# Industry CAT CAIS Release Status

November 22, 2022

# Full CAIS Compliance Updates

The Interim Reporting Obligation Schedule set forth in CAT Alert 2022-01 is being updated as follows:

Interim Obligation 1 – No change Interim Obligation 2 – No change Interim Obligation 3 – No change Interim Obligation 4 – Moved from December 5, 2022 to **March 10, 2023** Full Compliance Go-Live – Moved from December 12, 2022 to **March 17, 2023** 

In addition:

1. The transaction data FDID validations that were scheduled to begin in the Production environment on December 5, 2022 are being further delayed. An announcement will be made when a new date has been determined. It is anticipated the new date will be in January 2023.

2. Nightly Data Inconsistencies Feedback will be temporarily disabled until further notice. It is anticipated this feedback will be enabled again beginning in January 2023.

CAT LLC recently submitted a request for exemptive relief that would extend the deadline for Industry Member Phase 2e full reporting to the Central Repository. Accordingly, as reflected above, the updated Industry Member compliance dates are **March 10 and 17, 2023**, respectively.

# Agenda

- Full CAIS Release Update
- Open Issues
- Planned Enhancements
- Specification Updates
- General Announcements & Reminders
- Q&A

### Industry CAT Full CAIS Release Update

# Industry Member Release Rollout – Pre-Full CAIS Production

Full CAIS Release 1 Industry Test – 1/31/2022 Production – 4/25/2022

#### Ingestion

- Industry Test Open for Machine-to-Machine File & Data Integrity Validations, Material Inconsistencies, and Feedback
- Feedback file contains up to 1,000 Rejections

#### **CAIS Reporter Portal**

- Manual File Upload
- Manual Submission
- Submission Feedback
- Inconsistencies Feedback
- Nightly Inconsistencies
   Report

#### **Full CAIS Certification** opened on 2/1/2022

Full CAIS Release 2a Industry Test – 3/28/2022 Production – 4/25/2022

#### Ingestion

- New DRIVERLICENSE Foreign TID Type
- EIN Validation changed to format validation
- Feedback file enhanced to include all Rejections feedback

#### **CAIS Reporter Portal**

 FDID Reconciliation Report updated with Full CAIS information (count of CAT Customers and Version information) Full CAIS Release 2b Industry Test – 4/11/2022 Production – 4/25/2022

#### Ingestion

- Remove OTHBKR and CP customerType values for Legal Entity Customer Records
- Remove BROKERAGE and ADVISED values for accountType
- Remove primeBrokerID and bankDepositoryID fields and add a new DVPCustodianID field

# Industry Member Release Rollout – Full CAIS Production

Full CAIS Release 3a Industry Test – 5/25/2022 Production – 6/13/2022

#### Ingestion

- New Authorized Trader Names List on FDID record
- Increase *lastName* field length to 200 characters

#### Reports

 FDID Version Report posted to SFTP weekly, containing active LTID Phase FDIDs not updated to Full CAIS Phase

#### **CAIS Reporter Portal**

 FDID Version Report available on-demand, containing active LTID Phase FDIDs not updated to Full CAIS Phase Full CAIS Release 4 Industry Test – 6/26/2022 Production – 7/1/2022

#### Ingestion

 New OTHGOVT Foreign TID Type

#### **Performance Enhancements**

• CAIS file processing improvements

Minor Enhancements and Bug Fixes Full CAIS Release 5 Industry Test – 9/19/2022 Production – 10/3/2022

#### **Performance Enhancements**

CAIS file processing improvements

Minor Enhancements and Bug Fixes Full CAIS Release 6 Industry Test – 11/21/2022 Production – 12/5/2022

**Bug Fixes** 

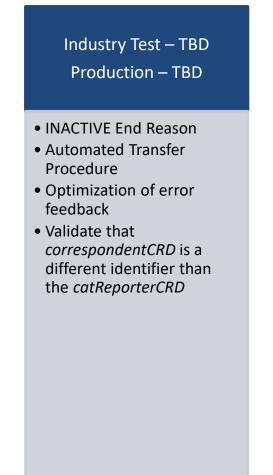
### Industry Member Release Rollout – Full CAIS Production

#### CAIS Report Card Release

#### **Report Card**

- The first Full CAIS Compliance Report Card will be published on May 15, 2023 for the month of April.
- Compliance Rates distinguished for Correspondent data

### Industry Member Release Rollout -Planned Future Enhancements



	Industry Test Environment												
	Monday, 11/14	Tuesday, 11/15	Wednesday, 11/16	Thursday, 11/17	Friday, 11/18	Saturday, 11/19	Sunday, 11/20						
Number of Total Submitters	30	32	28	36	34	7	4						
Number of Unique Firms	167	164	149	153	396	124	4						
Number of Files Received	Total: 484 Reporter Portal: 6 SFTP: 478	Total: 618 Reporter Portal: 15 SFTP: 603	Total: 488 Reporter Portal: 15 SFTP: 473	Total: 561 Reporter Portal: 11 SFTP: 550	Total: 1,102 Reporter Portal: 16 SFTP: 1,086	Total: 355 Reporter Portal: 0 SFTP: 355	Total: 12 Reporter Portal: 2 SFTP: 10						
Number of Files Rejected	103	154	116	113	134	4	8						
File Reject Rate	21.28%	24.92%	23.77%	20.14%	12.16%	1.13%	66.67%						

	Industry Test Environment													
Monday, 11/14 Tuesday, 11/15 Wednesday, 11/16 Thursday, 11/17 Friday, 11/18 Saturday, 11/1														
FDID Records Accepted	135,129	494,181	375,780	523,392	579,098	43,927	120,289							
FDID Records Rejected	41,472,394	139,398	901,551	1,326,703	1,500,229	6,462	2,219							
FDID Records Submitted	41,607,523	633,579	1,277,331	1,850,095	2,079,327	50,389	122,508							
FDID Record Rejection Rate	99.68%	22.00%	70.58%	71.71%	72.15%	12.82%	1.81%							

	Industry Test Environment													
	Monday, 11/14	Friday, 11/18	Saturday, 11/19	Sunday, 11/20										
Customer Records Accepted	195,537	302,502	220,509	585,073	617,134	58,744	101,469							
Customer Records Rejected	ds 37,495,571 151,857	825,332	825,332 2,292,262	1,642,973	8,714	1,036								
Customer Records Submitted	37,691,108	454,359	1,045,841	2,877,335	2,260,107	67,458	102,505							
Customer Record Rejection Rate	99.48%	33.42%	78.92%	79.67%	72.69%	12.92%	1.01%							

			Production En	vironment			
	Monday, 11/14	Tuesday, 11/15	Wednesday, 11/16	Thursday, 11/17	Friday, 11/18	Saturday, 11/19	Sunday, 11/20
Number of Total Submitters	63	75	74	77	76	20	4
Number of Unique Firms	460	891	852	863	847	442	4
Number of Files Received	Total: 1,169 Reporter Portal: 85 SFTP: 1,084	Total: 2,710 Reporter Portal: 39 SFTP: 2,671	Total: 2,430 Reporter Portal: 62 SFTP: 2,368	Total: 2,466 Reporter Portal: 37 SFTP: 2,429	Total: 2,354 Reporter Portal: 55 SFTP: 2,299	Total: 1,282 Reporter Portal: 0 SFTP: 1,282	Total: 70 Reporter Portal: 1 SFTP: 69
Number of Files Rejected	er of Files 14 161		61	71	71	19	0
File Reject Rate	1.20%	5.94%	2.51%	2.88%	3.02%	1.48%	0.00%

	Production Environment													
	Monday, 11/14	Friday, 11/18	Saturday, 11/19	Sunday, 11/20										
FDID Records Accepted	1,210,108	5,278,582	2,839,325	3,157,362	3,939,860	3,589,810	65,934							
FDID Records Rejected	762,653	2,653 887,584		478,710 424,219		297,700	746							
FDID Records Submitted	1,972,761	6,166,166	3,318,035	3,581,581	4,598,143	3,887,510	66,680							
FDID Record Rejection Rate	38.66%	14.39%	14.43%	11.84%	14.32%	7.66%	1.12%							

	Production Environment													
	Friday, 11/18	Saturday, 11/19	Sunday, 11/20											
Customer Records Accepted	1,201,118	5,914,096	2,918,296	3,644,515	4,150,200	4,336,792	93,582							
Customer Records Rejected	741,351	741,351 1,153,939	673,569	591,758	768,662	445,788	1,363							
Customer Records Submitted	1,942,469	7,068,035	3,591,865	4,236,273	4,918,862	4,782,580	94,945							
Customer Record Rejection Rate	38.17%	16.33%	18.75%	13.97%	15.63%	9.32%	1.44%							

# Full CAIS Phase Rejection Observations

<b>Rejection Source</b>	Top Rejection Reasons
File	<ul> <li>Duplicate file</li> <li>Missing or Invalid File Version</li> <li>Paired Identifiers file not received</li> <li>CAIS file not Readable</li> <li>Missing or Invalid CAT Reporter CRD</li> </ul>
FDID	<ul> <li>Missing ADDRESS1 type Address Record</li> <li>Associated Customer Record rejected</li> <li>Missing or Invalid <i>customerRecordID</i> within <i>fdidCustomerList</i></li> <li>Improper Use of Address Type</li> <li>No Customer association with trading capabilities</li> </ul>
Customer	<ul> <li>Customer record rejected because an associated FDID was rejected</li> <li>Customer Record has an open Material Inconsistency and <i>updateNotification</i> was not set as true</li> <li>Missing or Invalid <i>lastName</i></li> <li>Missing or invalid format of <i>yearOfBirth</i></li> <li>Multiple instances of customer with differing data</li> </ul>

# Open Issues, Planned Enhancements, and Specification Updates

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production/Production Mirror Environments Targeted Release Date/Workaround	Area Affected
1	Open	N/A	Intermittent instances where rejections, inconsistencies details and repair credit may be incomplete on the reporter portal screens. Rejections and Inconsistencies details are being delivered via feedback files.	TBD	High	Fix: TBD	Fix: TBD	Reporter Portal
2	Open	23004, 23005, 24001, 24005, 22503, 22525	An attempt to resolve certain errors may incorrectly generate additional erroneous rejections and/or warnings. For example, resolving a material inconsistency error may	TBD	High	Fix: TBD	Fix: TBD	Data Validation
3	Open	N/A	High volumes of Rejections and Inconsistencies may result in an incomplete CSV download error.	Code Release	High	Fix: TBD	Fix: TBD	Reporter Portal
4	Open	N/A	Intermittent issues with filtering results on rejections and inconsistencies.	TBD	High	Fix: TBD	Fix: TBD	Reporter Portal

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production/Production Mirror Environments Targeted Release Date/Workaround	Area Affected
5	Open	N/A	Files containing more than 6 Million total records (FDIDs + CAT Customers) may not return feedback in the times specified within the Full CAIS Technical Specifications.	Code Release	Medium	Fix: TBD	Fix: TBD	Feedback Files
6	Open	N/A	Submissions Report is displaying negative outstanding counts for rejections and inconsistencies. Also, the export is missing FDID accepted and FDID rejected columns.	Code Release	Medium	Inconsistencies Fix: 10/31/22 Rejections Fix: TBD	Inconsistencies Fix: 11/07/22 Rejections Fix: TBD	Reporter Portal
7	Open	N/A	Use of the Manual Submission within the Reporter Portal UI does not currently allow a user to enter extended text characters properly for the <i>accountName</i> field. Submission of extended text characters in the field via SFTP or upload of files within the Reporter Portal does allow for the extended text properly.	Code Release	Medium	Fix: TBD	Fix: TBD	Reporter Portal
8	Open	N/A	In instances when an attempt to repair is also rejected, the user is unable to view the new rejection on the error identification date which means the feedback does not match the rejections on the reporter portal screen.	Code Release	Medium	Fix: TBD	Fix: TBD	Reporter Portal

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production/Production Mirror Environments Targeted Release Date/Workaround	Area Affected
9	Open	N/A	Instances when an error occurs for a customer record where the same CAT customer is reported with multiple <i>customerRecordID</i> values, SFTP feedback will include only one of the <i>customerRecordIDs</i> . The portal feedback displays all <i>customerRecordIDs</i> related to the error.	Code Release	Medium	Fix: TBD Specification Update: TBD	Fix: TBD Specification Update: TBD	Feedback Files
10	Open	N/A	Account/Customer Rejections screen incorrectly displays a status of 'Outstanding (0)' and the details screen incorrectly displays a status of 'Outstanding' instead of 'Resolved'. The individual records on details screen are accurately labeled as 'Resolved'. Statistics and feedback are not impacted by this issue.	Code Release	Medium	<b>Fix</b> : 11/21/2022	<b>Fix</b> : 12/05/2022	Reporter Portal
11	Open	N/A	Use of manual submission form is currently unavailable for submitter firms submitting on behalf of other reporter firms.		Medium	Fix: 11/21/2022 Workaround: Submitter firms can successfully submit via manual file upload and SFTP.	Fix: 12/05/2022 Workaround: Submitter firms can successfully submit via manual file upload and SFTP.	Reporter Portal

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production/Production Mirror Environments Targeted Release Date/Workaround	Area Affected
12	Open	N/A	When a filter has been applied to the Rejections table, the CSV file downloaded includes all records in the table rather than only filtered records.	Code Release	Low	Fix: TBD	Fix: TBD	Reporter Portal
13	Open	N/A	In limited instances, for dates 9/22/22 and 9/23/22, impacted inconsistencies were erroneously duplicated for the same Customer. Resolving one of them using the <i>updateNotification</i> does not resolve all of the Customer's outstanding Inconsistencies.		Low	Fix: TBD	Fix: TBD	Reporter Portal
14	Open	N/A	The <i>customerRejectionEventID</i> conditional attribute within the CAIS Data Feedback File is not present for rejections against customer records. This field is displayed on the reporter portal as a 'Text' rather than 'Unsigned'.	Code Release	Low	Specification Update: TBD	Specification Update: TBD	Feedback Files Reporter Portal
15	Open	24001, 24005	Correction attempt with a <i>rejectionID</i> unknown to CAIS generates an incorrect warning of 24005 instead of 24001.	Code Release	Low	Fix: TBD	Fix: N/A	Data Validation
16	Open	N/A	FDID Version Report includes FDIDs that have been previously ended.	Code Release	Low	Fix: TBD	Fix: TBD	Reports
17	Open	N/A	Duplicate rows are present in the downloaded file when downloading the Rejections table from the Reporter UI.	Code Release	Low	Fix: TBD	Fix: TBD	Reporter UI

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production/Production Mirror Environments Targeted Release Date/Workaround	Area Affected
18	UPDATED- Open		Incorrectly generating Error code 22526 ( <i>customerRecordID</i> not present in paired Identifiers file) instead of 22914 when the Paired TID Record fails validation.	Code Release	Low	Fix: TBD	Fix: TBD	Data Validation
19	Open	30002, 30003, 30004	Intermittent instances where the CAIS system incorrectly generates subsequent nightly inconsistencies on customer records that have already been resolved with a prior submission.	Code Release	Low	Fix: TBD	Fix: TBD	Data Validation
20	NEW- Open	N/A	Rejection feedback and material inconsistences for files submitted as of 11/21/22 are currently unavailable in the CAT CAIS Industry Test environment reporter portal. This feedback is available via SFTP.	TBD	High	Fix: TBD	Fix: N/A	Reporter Portal

### CAT Full CAIS Recently Closed Issues List As of 11/22/2022

#	Status	Error Code	Summary	Resolu tion	Priority	Test Environment Targeted Release Date/Workaround	Production/Production Mirror Environments Targeted Release Date/Workaround	Area Affected

### **CAT CAIS Planned Enhancements – Open**

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date	Production/Production Mirror Environments Targeted Release Date	Area
1	Open	N/A	The Update button on a Manual Form Submission is enabled when viewing a previously added record. The button should be disabled until at least one field is updated by the user.	Code Release	Low	Fix: TBD	Fix: TBD	Manual Form Submission
2	Open	N/A	When selecting date values in the Manual Form Submission, the date is not selected when the user first clicks a date. The date is only selected on the second click.	Code Release	Low	Fix: TBD	Fix: TBD	Manual Form Submission
3	Open	N/A	Certain columns are not displayed in the Submission Report by default.	Code Release	Low	Workaround: User may add the columns to their view. Fix: TBD	Fix: N/A	Reporter Portal

### **CAT CAIS Planned Enhancements – Recently Closed**

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date	Production/Production Mirror Environments Targeted Release Date	Area

### CAT CAIS-

#### Planned Full CAIS Phase Specification Updates

#	Status	Summary	Publish Date	Spec Version	Effective Date - Test	Effective Date – Prod/Prod Mirror
1	Published	Add a new <i>fdidEndReason</i> value of 'INACTIVE' as option to end FDIDs that have had no CAT-reportable activity events (e.g., MENO, MEOR, MEOT, etc.) associated with the Account in the prior six months. For the purposes of periodic refresh requirements, monthly refresh report excludes any FDID with an <i>fdidEndReason</i> of 'INACTIVE' populated and an <i>fdidEndDate</i> set on or before the date of the report.	3/9/22	2.0 r7	TBD	TBD
2	Open	Update the description of Error Code 22523 – Customer Record rejected because an associated FDID was rejected – to include that the Error Code is also returned in the event the Customer Record is not associated to at least one FDID within the submission file.	TBD	2.0 r10	N/A	N/A
3	Open	Update the October 11, 2022 date in the description of the <i>role</i> value of 'AUTH3RD' to be consistent with revised FAQ T7. Specifically, prior to June 12, 2023, this <i>role</i> may be used when the Industry Member itself has authority to place orders for the Account without prior approval of the account holder(s) and is not the holder of the account. Effective June 12, 2023, the <i>role</i> for the Industry Member must be reported as 'AUTHREP'.	TBD	2.0 r10	N/A	N/A
4	Open	Clarify the description of the <i>customerType</i> value of 'RIC'- Customer is a Registered Investment Company, as defined in the Investment Company Act of 1940 (15 U.S.C. § 80a–3(a)(1)), if maintained in the Industry Member's general customer and account records.	TBD	2.0 r10	N/A	N/A
5	Open	Update the definition of the sentinel file for the Nightly Inconsistencies scans to remove the .bz2 compression. The sentinel file does not contain any significant data and does not require the compression.	TBD	2.0r 10	N/A	N/A

#### \* Planned Technical Specification updates are subject to approval by the CAT NMS Plan Operating Committee.

### CAT CAIS-Planned Full CAIS Phase Specification Updates

#	Status	Summary	Publish Date	Spec Version	Effective Date - Test	Effective Date – Prod/Prod Mirror
6	Open	Clarify that a total of 2,000 Customer Records can currently be associated with an FDID Record. Create an additional Error Code for more granularity on this validation, currently feedback provided under Error Code 23999 (Unhandled Exception).	TBD	2.0 r10	7/31/22	8/8/22
7	Open	Update the Table 17 and Table 18 entries for the file status of COMPLETED_FILE_TIMEOUT to include the status is also returned in the CAIS Data Feedback or TIDS Feedback files in the event the paired file is received but reaches a COMPLETED_INTEGRITY_ERROR state.	TBD	2.0r 10	N/A	N/A
8	Open	Clarify that the nightly inconsistencies scan feedback for Material Inconsistencies where the Industry Member is Impacted by submissions of another Industry Member is provided to the Impacted Industry Member no later than 8AM ET each processing day.	TBD	2.0 r10	N/A	N/A
9	Open	Remove error code 22066 ( <i>roleStartDate</i> set prior to <i>fdidDate</i> ).	TBD	2.0 r10	7/31/22	8/8/22
10	Open	Add warning code 24008 (Data Type Violation within <i>correctionList</i> ) – present in LTID Specification but was not copied over to Full CAIS Specifications.	TBD	2.0 r10	N/A	N/A

\* Planned Technical Specification updates are subject to approval by the CAT NMS Plan Operating Committee.

### CAT CAIS-Planned Full CAIS Phase Specification Updates

#	Status	Summary	Publish Date	Spec Version	Effective Date - Test	Effective Date – Prod/Prod Mirror
11	Open	Update Table 19 to clarify that <i>updateNotifications</i> is a Main JSON Object.	TBD	2.0 r10	N/A	N/A
12	Open	Update Table 17 to clarify that <i>correspondentCRD</i> is only populated in the feedback file when <i>correspondentCRD</i> is populated in the submission file.	TBD	2.0 r10	N/A	N/A
13	Open	Update Table 17 to clarify that the data type for <i>addrType</i> is Choice rather than Text (2).	TBD	2.0 r10	N/A	N/A
14	Open	<ul> <li>Table 17: Update the <i>statusHistory</i> to include COMPLETED_INTEGRITY_ERROR and INCOMPLETE_PROCESSING FAILURE.</li> <li>Table 18: Update <i>statusHistory</i> to include COMPLETED_FILE_TIMEOUT and INCOMPLETE_PROCESSING_FAILURE.</li> <li>Table 19: Update <i>submissionStatus</i> to include COMPLETED_WITH_REJECTIONS, COMPLETED_WITHOUT_REJECTIONS, and CANCELLED_BY_SUPPORT, as well as remove COMPLETED. Note: the <i>submissionStatus</i> attribute is slated for removal from the Submission Inconsistencies Feedback File in the future (effective date is TBD).</li> </ul>	TBD	2.0 r10	N/A	N/A
15	Open	Clarify the description of <i>customerType</i> value of 'BD' - Customer is a US registered Broker/Dealer, if maintained in the Industry Member's general customer and account records. Effective July 11, 2023, 'BD' must be populated for all US registered Broker/Dealer customer types, including for broker-dealer Customers that were not identified as 'BD' prior to July 11, 2023.	TBD	2.0 r10	N/A	N/A

\* Planned Technical Specification updates are subject to approval by the CAT NMS Plan Operating Committee.

### **General Announcements and Reminders**

# FINRA CAT Announcements and Reminders

- The Production and Production Mirror Environments for both the CAT Transaction and CAT CAIS systems will be unavailable from approximately 8 a.m. ET to 11 a.m. ET on December 5, 2022 for IM Release 3. During this time, Industry Members will not be able to submit data to CAT.
- The next CAT CAIS Checkpoint call will be on Wednesday, November 30, 2022, at 4:15 pm ET.
- Connectivity Guides, Reporting Scenarios, Use Cases, and updated FAQs available at catnmsplan.com

# Industry Member Timeline Design

Requirement	Date
Production Certification Deadline	July 25, 2022
<ul> <li>Interim reporting obligation 1: CAT Submitters Partial Submissions.</li> <li>For a single date within the range specified, complete a scheduled partial submission to the Prod Environment in Full CAIS Format. FINRA CAT will begin contacting CAT Submitters on August 1 to schedule their partial submission dates.</li> </ul>	August 15 – September 15, 2022
<ul> <li>Interim reporting obligation 2: All Industry Members – Submission of all FDIDs and Customers</li> <li>For a single date within the range specified, complete a scheduled submission of the FDID Population with CAT-Reportable activity between June 12, 2022 and September 30, 2022 to the Prod Environment in Full CAIS format. FINRA CAT will begin contacting all Industry Members on October 3 to schedule their specific reporting date.</li> </ul>	October 10 – October 31, 2022
<ul> <li>Interim reporting obligation 3: Daily reporting of FDID and Customer Data</li> <li>All Industry members must begin daily reporting of FDID records and changes/additions for all CAT-Reportable Activity beginning June 12, 2022 through at least September 30, 2022. Corrections to reported data are not required until Interim Reporting Obligation 4.</li> </ul>	November 7, 2022
<ul> <li>Interim reporting obligation 4: All outstanding Rejections and Material Inconsistences addressed</li> <li>All outstanding rejections and Material Inconsistences for all CAT-reportable activity beginning June 12, 2022 are resolved.</li> </ul>	March 10, 2023
<ul> <li>Full CAIS Compliance date (Error correction timeline fully enforced)</li> <li>All error repair and material inconsistency resolution deadlines are enforced.</li> </ul>	March 17, 2023

An <u>Announcement</u> was published and the <u>Timeline</u> was updated. Please see <u>CAT Alert 2022-01</u> for more information.

### FINRA CAT Helpdesk

Questions may be directed to the FINRA CAT Helpdesk at 888-696-3348 or help@finracat.com

# How to Ask a Question during Today's Call

#### • For participants using computer audio:

- Click the "Raise Hand" button at the bottom of the participants window.
- A visual prompt will indicate that your line has been unmuted.

#### • For participants using phone audio:

- Enter \*9 on your phone keypad.
- An audio prompt will indicate that your line has been unmuted.