

Purpose: This form is for self-reporting deviations of clock synchronization consistent with the standards as detailed in [CAT Alert 2020-02](#) (Standards For Self-Reporting Deviations of Clock Synchronization Standards to FINRA CAT). The completed self-reporting form should be emailed to the FINRA CAT Helpdesk ([help@finracat.com](mailto:help@finracat.com)) and must include a reference to "Clock Sync Self-Report" in the subject line.

1. (A) CAT Reporter<sup>1</sup> Name (Reporting ID): \_\_\_\_\_

(B) CAT Submitter ID: \_\_\_\_\_ (Are you a CAT Reporting Agent?  YES;  NO)

(C) Are you a broker-dealer reporting on behalf of another broker-dealer?  YES;  NO

If you are a broker-dealer that is reporting in behalf of other broker-dealers list the broker-dealers you are reporting on behalf of in your response to item 9.

2. Member of the following national securities exchange(s) and/or national securities association(s) (please select all that apply):

<input type="checkbox"/> BOX Exchange LLC	<input type="checkbox"/> MIAX Emerald, LLC
<input type="checkbox"/> Cboe BZX Exchange, Inc.	<input type="checkbox"/> NASDAQ BX, Inc.
<input type="checkbox"/> Cboe BYX Exchange, Inc.	<input type="checkbox"/> Nasdaq GEMX, LLC
<input type="checkbox"/> Cboe C2 Exchange, Inc.	<input type="checkbox"/> Nasdaq ISE, LLC
<input type="checkbox"/> Cboe Exchange, Inc.	<input type="checkbox"/> Nasdaq MRX, LLC
<input type="checkbox"/> Cboe EDGA Exchange, Inc.	<input type="checkbox"/> NASDAQ PHLX LLC
<input type="checkbox"/> Cboe EDGX Exchange, Inc.	<input type="checkbox"/> The NASDAQ Stock Market LLC
<input type="checkbox"/> Financial Industry Regulatory Authority, Inc.	<input type="checkbox"/> New York Stock Exchange LLC
<input type="checkbox"/> Investors' Exchange, LLC	<input type="checkbox"/> NYSE American LLC
<input type="checkbox"/> Long-Term Stock Exchange, Inc.	<input type="checkbox"/> NYSE Arca, Inc.
<input type="checkbox"/> MEMX LLC	<input type="checkbox"/> NYSE Chicago, Inc.
<input type="checkbox"/> Miami International Securities Exchange LLC	<input type="checkbox"/> NYSE National, Inc.
<input type="checkbox"/> MIAX PEARL, LLC	
<input type="checkbox"/> Other: _____	

<sup>1</sup> "CAT Reporter" is defined in the CAT NMS Plan "to mean each national securities exchange, national securities association and Industry Member that is required to record and report information to the Central Repository pursuant to SEC Rule 613(c)."

3. Incident Type:

- PARTICIPANT<sup>2</sup> STANDARD: The Participant would need to self-report a deviation if a system handling CAT Reportable Events drifts outside of the CAT NMS Plan's required time frame (100 microseconds) for at least one second.
- LARGE DRIFT FROM CLOCK SYNCHRONIZATION STANDARDS: The Industry Member would need to self-report a deviation if a system handling CAT Reportable Events drifts out of compliance with the established standards by 2x the standard or 100 milliseconds for all systems other than those used for Manual Order Events and 2x the standard or 2 seconds for systems that process Manual Order Events.
- PERSISTENT DRIFT FROM CLOCK SYNCHRONIZATION: The Industry Member would need to self-report a deviation if a system handling CAT Reportable Events drifts out of compliance with the established standards 10 times in one rolling 24-hour period at any time when the system is recording a timestamp on data that is reportable to the CAT on a given device or server. (The 10 times standard also applies to systems that process Manual Order events.)

4. System Name: \_\_\_\_\_

5. Indicate the increments at which the system's business clocks are synchronized (e.g., every 10 minutes, every 15 minutes, 3 times each hour, hourly, at start and close): \_\_\_\_\_

6. Incident Date: \_\_\_\_\_ . Any additional dates, if necessary \_\_\_\_\_<sup>3</sup>  
(YYYYMMDD) (YYYYMMDD) (YYYYMMDD)

7. Specify each recorded time that the business clock drift exceeded the self-reporting threshold (if additional space is needed please append to this report):

(HHMMSS.CCCNNNNNN)	(HHMMSS.CCCNNNNNN)	(HHMMSS.CCCNNNNNN)	(HHMMSS.CCCNNNNNN)
(HHMMSS.CCCNNNNNN)	(HHMMSS.CCCNNNNNN)	(HHMMSS.CCCNNNNNN)	(HHMMSS.CCCNNNNNN)
(HHMMSS.CCCNNNNNN)	(HHMMSS.CCCNNNNNN)	(HHMMSS.CCCNNNNNN)	(HHMMSS.CCCNNNNNN)

<sup>2</sup> A "Participant" is a Participant under the CAT NMS Plan, which currently includes the national securities exchanges and national securities associations listed in question 2.

<sup>3</sup> If an incident persists for more than one day, but is resolved at the time of reporting, then only one form needs to be submitted. If the incident is ongoing when the form is submitted, then an updated form should be submitted when the incident has been resolved.

8. Indicate if the firm has submitted a self-reporting deviation for this system on a prior trading day by listing the prior report date: \_\_\_\_\_  
(YYYYMMDD)

9. Any other details that the firm would like to provide regarding this incident (including if you know the exact time when the incident started and when it ended):

10. Name and contact information for the individual submitting this form on behalf of the CAT reporter identified in item 1 above.

Name: \_\_\_\_\_

Email: \_\_\_\_\_

Phone: ( \_\_\_\_\_ ) \_\_\_\_\_ — \_\_\_\_\_

**SUBMISSION INSTRUCTIONS:**

FORMS SHALL BE EMAILED TO THE FINRA CAT HELPDESK ([HELP@FINRACAT.COM](mailto:HELP@FINRACAT.COM)) AND MUST INCLUDE A REFERENCE TO “**CLOCK SYNC SELF-REPORT**” IN THE SUBJECT LINE.