

CAT Customer and Account Information System (CAIS) Industry Member Onboarding Guide

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Version 1.10

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Change Log

Version	Date Published	Description of Change(s)
1.0	08/17/2020	Guide initially published on the CAT NMS web site.
1.1	08/25/2020	<ul style="list-style-type: none"> • Updated the Onboarding Overview and §7 to reflect that the Production Environment is not available until December. • Updated §1 Registration for CAIS to reflect the collection of approximate number of accounts. • Updated §6 to reflect testing certification expectations.
1.2	09/15/2020	<ul style="list-style-type: none"> • Updated §6 to clarify expectations for self-reporting firms, CAT Reporting Agents, and firms with no account information to be reported.
1.3	11/4/2020	<ul style="list-style-type: none"> • Updated §1 Register for CAIS to include the collection of the Legal Entity Identifier (LEI). • Updated §3 Create / Entitle CAT User Accounts for the CAIS Reporter Portal to reflect CAIS Release 1.1 updates for setting access to Industry Test and Production Environments.
1.4	12/21/2020	<ul style="list-style-type: none"> • Updated the following sections to reflect that a Production Mirror Environment will not be provided for CAIS at this time: <ul style="list-style-type: none"> ○ §3.1 CAT System Environments ○ §4.1 SFTP Environments
1.5	3/24/2021	<ul style="list-style-type: none"> • Updated the following sections to reflect the availability of a Production Mirror Environment: <ul style="list-style-type: none"> ○ §3.1 CAT System Environments ○ §3.2 CAIS Reporter Portal User Types ○ §4.1 Request for Secure File Transfer ○ §5 Establish CAIS Reporting Relationships in the Industry Test Environment ○ §6 Conduct Testing for Production Readiness • Clarified §6 applies to Testing for Production Readiness for the LTID Phase • Updated §6 to clarify expectations for Industry Members Submitting via CAT Reporting Agents • Added §7 for Testing for Production Readiness for Full CAIS Phase <ul style="list-style-type: none"> ○ Moved Previous §7 to §8

1.6	8/25/2021	<ul style="list-style-type: none"> • Cleaned up content in Section 6: Conduct Testing for Production Readiness for LTID Phase • Updated Section 7: Conduct Testing for Production Readiness for Full CAIS with the certification steps.
1.7	10/5/2021	<ul style="list-style-type: none"> • Updated Section 7: Conduct Testing for Production Readiness for Full CAIS to clarify expectations for submission of FDID records, Customer records, and TID Types for self-reporting firms and for Clearing Firms/CAT Reporting Agents.
1.8	1/12/2022	<ul style="list-style-type: none"> • Updated Section 3.1 to add clarification on the use of the CAT Test and CAT Prod access flags. • Updated Section 3.2 and Section 4.2 to clarify IM CAIS User Roles during the transition to Full CAIS.
1.9	8/2/2023	<ul style="list-style-type: none"> • Added clarifications to Section 1 and Sections 3 through 7. • Removed outdated resources and added additional resources to the Companion Documents section. • Removed references to outdated information (for example, past dates) • Removed all LTID Phase references including in: <ul style="list-style-type: none"> ○ Section 1 Register for CAIS ○ Section 3 Create/Entitle CAT User Accounts for the CAT Reporter Portal – CAIS ○ Section 4 Request CAIS Secure File Transfer Accounts ○ Section 6 Conduct Testing for Production Readiness for LTID Phase. • Added new Section 3.3 Required CAT Access and CAIS Entitlements and new Section 4.4 Required CAT Access and Entitlements for CAIS SFTP. • Renamed Section 7 as Section 6 Conduct Testing for Production Readiness. • Renamed Section 8 to Section 7 Certify Testing Completion • Changed references from Full CAIS to CAIS • Corrected typos throughout.
1.10	4/10/2024	Added clarification to footnote 1

Introduction

Rule 613 of the Securities Exchange Act of 1934 requires national securities exchanges and national securities associations (“SROs”) to submit a national market system plan to the Securities and Exchange Commission (“Commission” or “SEC”) to create, implement, and maintain a consolidated audit trail (the “CAT”) that would allow regulators to more efficiently and accurately track all activity in U.S. equity and listed options markets. Pursuant to Rule 613, the SROs filed with the Commission the National Market System Plan Governing the Consolidated Audit Trail (“CAT NMS Plan”), which was approved by the Commission on November 15, 2016.

Under Rule 613(g)(2), each member of a national securities exchange or national securities association is required to comply with all the provisions of the CAT NMS Plan. Relatedly, as mandated under Rule 613, the CAT NMS Plan requires each SRO to adopt rules requiring its members to comply with Rule 613 and the CAT NMS Plan, and to agree to enforce compliance by its members in that regard. Accordingly, each SRO has adopted rules requiring its members to comply with Rule 613 and the CAT NMS Plan. For example, see FINRA Rule 6800 Series.

The SROs jointly own Consolidated Audit Trail, LLC, which was formed by the SROs to arrange for and oversee the creation, implementation, and maintenance of the CAT as required under Rule 613. Thus, the CAT is a facility of each SRO.

For more information, refer to SEC Rule 613 at <https://www.sec.gov/rules/final/2012/34-67457.pdf> and the CAT NMS Plan at <https://www.catnmsplan.com/wp-content/uploads/2018/02/34-79318-exhibit-a.pdf>.

CAT Customer and Account Information System (CAIS) Onboarding Overview

The CAIS Onboarding Guide provides information to Industry Members and CAT Reporting Agents (CRA) on how to gain access to the CAIS Industry Test, Production Mirror, and Production Environments for the first time. Industry Members that report to CAT CAIS on their own behalf (self-reporting) or on behalf of another Industry Member and CAT Reporting Agents that report to CAT CAIS on behalf of Industry Members must complete the following steps to gain access to CAIS, including:

1. Register for CAIS
2. Designate CAIS Account Administrator(s)
3. Create/Entitle CAT User Accounts for the CAT Reporter Portal – CAIS
4. Request CAT Secure File Transfer Accounts, if applicable
5. Establish CAIS Reporting Relationships, if applicable
6. Conduct Testing for CAIS Production Readiness
7. Certify CAIS Testing Completion

This document provides instructions for completing each of these steps, as well as additional resources and information. Upon completion of these steps, access to the CAIS Production Environment will be authorized.

A separate Industry Member Onboarding Guide that provides the steps for gaining access to transmit Transaction data to CAT and to the CAT Transaction Reporter Portal is available on the [Transaction Registration & Onboarding](#) page of the CAT NMS Plan [website](#). It is assumed that CAIS onboarding will be done in conjunction with or following Transaction onboarding. If the organization does not need Transaction access but does need to access CAT CAIS, contact the FINRA CAT Help Desk to ensure that all appropriate steps are completed.

Questions

Questions related to this document may be directed to the FINRA CAT Help Desk at 888-696-3348 or at help@finracat.com.

Companion Documents

- FINRA Gateway: <https://gateway.finra.org/app/ews-landing-page>
- FINRA Entitlement Reference Guide: <https://www.finra.org/filing-reporting/entitlement/reference-guide>
- CAIS Registration: <https://www.catnmsplan.com/cais-registration>
- CAIS Reporter Portal User Guide: <https://www.catnmsplan.com/cais-registration>
- Connectivity Guide: <https://www.catnmsplan.com/cais-registration>
- Frequently Asked Questions: <https://www.catnmsplan.com/faq>
- Transaction Registration & Onboarding: <https://www.catnmsplan.com/transaction-registration>

1. Register for CAIS

Any member of a national securities exchange or national securities association that handles orders or quotes in NMS equity securities, OTC equity securities, or listed options and any CAT Reporting Agent that is or will be authorized to submit data to CAT on behalf of an Industry Member must register in order to report to the CAIS system.

The CAT Registration For Customer and Account Information (CAIS) Form must be submitted online at <https://www.catnmsplan.com/cais-registration>.

The information collected on the registration form includes:

- Company Name, Address, Type of Organization, CRD number or ORG ID¹, Legal Entity Identifier (LEI)²
- Primary and Secondary Contact Name, Phone, Email
- Primary and Secondary Source of CAT CAIS Reporting (Self-Reporting or Vendor)
- Preferred Connectivity (SFTP and/or CAT Reporter Portal – CAIS)
- Approximate number of accounts (in aggregate) that will be submitted to CAIS
- Whether the firm is a clearing firm

The registration form will be processed within two business dates of receipt. The Super Account Administrator (SAA) will receive an email when the CAIS registration form has been processed and the new entitlements have been added to its account. The SAA can then set up Account Administrators and provide other users access to the CAIS Test and Production Mirror Environments (see [§2 Designate CAIS Account Administrator\(s\)](#)).

Industry Members that have no accounts (*firmDesignatedIDs* or FDIDs) to report at this time are still encouraged to complete the registration process in order to efficiently onboard in the future if and when necessary. For more information, see [§6.4 Production Readiness Requirements for Industry Members that Do Not Have Production FDIDs](#).

¹ CAT Reporting Agents that have already been assigned an ORG ID must populate the field with that identifier. CAT Reporting Agents that do not have a CRD number or an existing ORG ID must populate the CRD number field with 'NA' for Not Applicable. An ID will be assigned once a CAT Reporting Agent Agreement is submitted and an account is created for an Account Administrator. The ID will be provided by the FINRA Entitlement Team in the notification email alerting that Account Administrator access has been granted. If the CAT Reporting Agent Agreement has not been completed, please refer to this link: <https://www.catnmsplan.com/transaction-registration> and access the document in the Forms section.

² See FAQ [Q38](#) on the CAT NMS Plan [website](#) for additional information.

2. Designate CAIS Account Administrator(s)

Access to CAT CAIS leverages the FINRA Entitlement Program that includes the Super Account Administrator (SAA) role for Industry Members and an Account Administrator (AA) role for CAT Reporting Agents (Service Providers). Refer to <http://www.finra.org/industry/entitlement-program> for additional information on the FINRA Entitlement Program.

3. Create/Entitle CAT User Accounts for the CAT Reporter Portal – CAIS

The SAA and AAs for organizations that have met the prerequisites described in [§1 Register for CAIS](#) and [§2 Designate CAIS Account Administrator\(s\)](#) can create user accounts and grant entitlement to the CAT Reporter Portal – CAIS via [FINRA Gateway](#).

The CAT Reporter Portal – CAIS is a web-based tool that allows Industry Members and CAT Reporting Agents to monitor and manage data submissions to CAT. The CAT Reporter Portal – CAIS includes end-to-end capability for providing submissions, and review and repair errors. Links to the CAT Reporter Portal – CAIS can be found in the [CAT CAIS Reporter Portal User Guide](#).

The SAA and AA must determine which environment(s) the user(s) will have access to (see [§3.1 CAT System Environments](#)) and which User Roles are appropriate for each user (see [§3.2 CAT Reporter Portal – CAIS User Roles](#)).

3.1. CAT System Environments

The Industry Test Environment (Test Environment), Production Mirror Environment (Prod Mirror Environment) and Production Environment are used in concert to facilitate efficient testing for Industry Members and CAT Reporting Agents. The three environments are available for Industry Members and CAT Reporting Agents, as defined below:

Environment	Functionality	Purpose
Industry Test	Functionality that is currently in the development and testing phase and has not yet been released to the Production Environment. Data submitted to the Test Environment can be obfuscated.	Conduct testing for production readiness and user testing of new functionality.
Production Mirror	Full production-equivalent functionality.	Can also be utilized to conduct testing for production readiness.

		Allows for the submission of data to a production-equivalent environment. This may be used to test code enhancements or corrections prior to providing such data to the Production Environment.
Production	Full production functionality.	Provision of production data as required by the CAT NMS Plan.

CAT Super Account Administrators (SAAs)

The FINRA Entitlement Team will manage environment access for all SAAs. An SAA will be able to manage access to the Test and Prod Mirror Environment upon completion of the requirements outlined in [§1 Register for CAIS](#) and [§2 Designate CAIS Account Administrator\(s\)](#). When an organization has completed CAIS testing for production readiness and is granted production access, per [§7 Certify Testing Completion](#), the SAA will be given the ability to manage access to the Production Environment for its users.

CAT Account Administrators (AAs) (as Access Managers)

When creating or modifying an account for an **Account Administrator**, the SAA must indicate if the AA is able to grant and manage access to the Test, Prod Mirror and/or Production Environments.

CAT Users (including Account Administrators)

When creating or modifying an account for a user, the SAA/AA must indicate if the user is able to access the Test, Prod Mirror and/or Production Environments.

Additional tips for managing user and administrator accounts are available in the following guides:

- [FINRA Entitlement Reference Guide](#)
- [FINRA Gateway](#)

3.2. CAT Reporter Portal – CAIS User Roles

The following entitlements may be assigned to grant users access to CAIS.

Entitlement	Description
CAIS Reporter	Provides access to the CAT Reporter Portal – CAIS. <i>Note: At least one of the entitlements below must also be granted for the user to access the CAT Reporter Portal – CAIS.</i>
Reporter User	Allows a user to: <ul style="list-style-type: none"> • Create, view, and transmit CAIS records. • Upload files. • View status files. • View and repair errors. • View submission statistics. • Manage reporting relationships.
Reporter Read-Only User	Allows the user to: <ul style="list-style-type: none"> • View status files and submission statistics.
Reporter Production User	Allows a user to: <ul style="list-style-type: none"> • Access functionality for assigned entitlements as described above in the Production Environment. <p>For example, a user with the Reporter User entitlement may create, view, and transmit CAIS records in the Industry Test and Production Mirror Environments. A user with the Reporter User and Reporter Production User entitlements may create, view, and transmit CAIS records in the Industry Test, Production Mirror, and Production Environments. This entitlement is only provided when the Industry Member or CAT Reporting Agent is certified for the Production Environment.</p>

3.3. Required CAT Access and CAIS Entitlements

The following table shows the required CAT Access and CAIS Entitlements that must be selected to ensure that a user has the appropriate entitlements to the appropriate environments. Note that the SAA or AA must choose the CAT Access (Test/Prod Mirror, Production or both) before Entitlements can be assigned.

Scenario #	Scenario Description	Required CAT Access	Required CAIS Entitlements
CAIS Test and Prod Mirror Environments Only			
1	User requires access to CAIS Test and Prod Mirror to view/read only	✓ CAT Test Access	✓ CAIS Reporter ✓ Reporter Read-Only User
2	User requires access to CAIS Test and Prod Mirror to view/read and upload/submit	✓ CAT Test Access	✓ CAIS Reporter ✓ Reporter User
CAIS Production Environment Only			

Scenario #	Scenario Description	Required CAT Access	Required CAIS Entitlements
3	User requires access to CAIS Production to view/read only	✓ CAT Prod Access	<ul style="list-style-type: none"> ✓ CAIS Reporter ✓ Reporter Production User ✓ Reporter Read-Only User
4	User requires access to CAIS Production to view/read and upload/submit	✓ CAT Prod Access	<ul style="list-style-type: none"> ✓ CAIS Reporter ✓ Reporter Production User ✓ Reporter User
CAIS Test, Prod Mirror, and Production Environments			
5	User requires access to CAIS Test, Prod Mirror and Production to read/view only	✓ CAT Test Access and CAT Prod Access	<ul style="list-style-type: none"> ✓ CAIS Reporter ✓ Reporter Production User ✓ Reporter Read-Only User
6	User requires access to CAIS Test, Prod Mirror and Production to view/read and upload/submit	✓ CAT Test Access and CAT Prod Access	<ul style="list-style-type: none"> ✓ CAIS Reporter ✓ Reporter Production User ✓ Reporter User

4. Request CAIS Secure File Transfer Accounts

Only Industry Members and CAT Reporting Agents submitting via a Managed Network Service Provider or AWS PrivateLink are required to request CAIS Secure File Transfer Accounts. All other Industry Members and CAT Reporting Agents may continue to §5 Establish CAIS Reporting Relationships.

4.1. CAIS Secure File Transfer Accounts

CAIS Secure File Transfer Protocol (SFTP) accounts enable Industry Members and CAT Reporting Agents to create a machine-to-machine connection to securely transmit data to CAIS and receive related feedback. To create an SFTP account, the organization must first have an SAA or AA established and then submit a CAT CAIS Secure File Transfer Protocol (SFTP) Account form, available on the CAT NMS Plan website at <https://catnmsplan.com/cais-registration>. Once the request is verified and processed, the FINRA Entitlement team will send the account credentials to the contact identified on the form. Prior to first use of the SFTP account to submit data, the initial password must be reset by logging into <https://gateway.finra.org/app/ews-landing-page>.

CAIS SFTP accounts are solely for the machine-to-machine transmission of data to/from CAIS and cannot be used to access any other CAT system. Additionally, existing FINRA FTP accounts cannot be used to submit data to or receive data from CAIS. Industry Members and CAT Reporting Agents submitting to CAIS via SFTP are required to have two separate FTP accounts, one for the Production Environment and one for the Test Environment (including Prod Mirror).

4.2. SFTP Environments

Three environments are available for Industry Members and CAT Reporting Agents to access as described in §3.1 CAT System Environments. When requesting an SFTP account, the SAA must designate the access level on the CAT CAIS Secure File Transfer Protocol (SFTP) Account form, that is, if the account is for Test (including Prod Mirror), Production, or both. If no access level is marked on the CAT CAIS Secure File Transfer Protocol (SFTP) Account form, the SFTP account will be given access to both Test (including Prod Mirror) and Production Environments. An SAA may submit another CAT CAIS Secure File Transfer Protocol (SFTP) Account form to update the access level if required.

SFTP accounts will be given access to Production only after testing certification has been completed, as described in §7 Certify Testing Completion. When the Industry Member or CAT Reporting Agent completes testing certification and is granted access to the Production Environment, any SFTP account for which production access was designated will be granted production access.

The SAA (for an Industry Member) or the AA (for a CAT Reporting Agent) must submit a CAT CAIS Secure File Transfer Protocol (SFTP) Account form to request the access be changed for an SFTP account if access should be given to or removed from an existing SFTP account. **When removing SFTP environment access, ensure that the Industry Member or CAT Reporting Agent has at least one remaining SFTP account for the environment.** For example, if the Industry Member or CAT Reporting Agent has only one SFTP account with production access that access should not be removed since it would leave the Industry Member or CAT Reporting Agent without the ability to submit data to the Production Environment.

4.3. Entitlements for CAIS SFTP Accounts

Per the [CAT CAIS Secure File Transfer Protocol \(SFTP\) Account](#) form, the following entitlements may be assigned to grant users access to CAIS:

Entitlement	Description
SFTP User	Allows a machine user to: <ul style="list-style-type: none"> • Connect to the CAIS SFTP server • Upload files • Retrieve feedback files
SFTP Read-Only User	Allows a machine user to: <ul style="list-style-type: none"> • Connect to the CAIS SFTP server • Retrieve feedback files
Reporter Production User	Allows a machine user to: <ul style="list-style-type: none"> • Access functionality for assigned entitlements as described above in the Production Environment. For example, a user with the SFTP User entitlement may upload CAIS files in the Industry Test and Production Mirror Environments. A user with the SFTP User and Reporter Production User entitlements may upload CAIS files in the Industry Test, Production Mirror, and Production Environments. This entitlement is only provided when the Industry Member is certified for the Production Environment.

4.4. Required CAT CAIS Access for CAIS SFTP

The following table shows the required CAIS SFTP Entitlements that must be selected on the [CAT CAIS Secure File Transfer Protocol \(SFTP\) Account](#) form to ensure that a machine user has the appropriate entitlements to the appropriate environments. In order to access the Test Environment (including Prod Mirror) and the Production Environment, a machine user must have two separate FTP accounts and it is not possible for a machine user to access the Test/Prod Mirror and Production Environments with the same account.

Scenario #	Scenario Description	Required CAIS SFTP Access
1	User requires access to CAIS Test SFTP and Prod Mirror SFTP to view/read only	✓ TEST Only - SFTP Read-Only User
2	User requires access to CAIS Test SFTP and Prod Mirror SFTP to view/read and upload/submit	✓ TEST Only - SFTP User
3	User requires access to CAIS Production SFTP to view/read only	✓ Reporter Production User ✓ SFTP Read-Only User
4	User requires access to CAIS Production SFTP to view/read and upload/submit	✓ Reporter Production User ✓ SFTP User

5. Establish CAIS Reporting Relationships

Only Industry Members that are not self-reporting to CAIS (i.e., another Industry Member(s) or CAT Reporting Agent(s) is submitting to CAIS on their behalf) are required to establish CAIS Reporting Relationships. Industry Members that are self-reporting to CAIS may continue to §6 Conduct Testing for Production Readiness. CAIS Reporting Relationships are required to authorize another Industry Member or CAT Reporting Agent to report and manage CAIS data on behalf of an Industry Member.

For CAIS certification, CAIS Reporting Relationships must be created and managed in the Transaction Reporter Portal in the Industry Test Environment.

A CAIS Reporting Relationship authorizes an organization (the CAT Reporting Agent or other Submitter) to:

- Transmit data to CAIS on behalf of the Industry Member.
- View and act on reporting feedback and errors for CAIS data submitted on behalf of the Industry Member.
- Receive the error feedback in its SFTP feedback folder for data submitted on behalf of the Industry Member via SFTP.

For additional information on establishing and maintaining CAIS Reporting Relationships, see the Industry Member [CAT CAIS Reporter Portal User Guide](#).

CAIS Reporting Relationships must be created and managed in each environment separately. Relationships created in the Industry Test Environment, Production Mirror Environment, and Production Environment will not be ported into another environment. CAIS Reporting Relationships must be independently established in Industry Test, Production Mirror, and/or Production as needed to support the submission of data to the respective environment.

6. Conduct Testing for Production Readiness

Industry Members and CAT Reporting Agents are required to perform production readiness testing to demonstrate their ability to successfully submit data to the Production Environment. Production readiness testing is performed in the CAIS Industry Test Environment. Production readiness testing is limited to the validations in effect when an Industry Member is required to begin reporting data to CAIS. Industry Members and CAT Reporting Agents may submit full production-equivalent loads to the Industry Test Environment. Submission and feedback processes mirror those of the Production Environment.

Testing certification must be completed in order to be granted access to the CAIS Production Environment.

Testing certification requirements are different for:

- Self-Reporting Industry Members (see [§6.1](#))
- Clearing Firms and CAT Reporting Agents (see [§6.2](#))
- Industry Members submitting via CAT Reporting Agents (see [§6.3](#))
- Industry Members that do not currently have a CAIS reporting obligation (see [§6.4](#))

6.1. Production Readiness Requirements for Self-Reporting Industry Members

Industry Members that will report to CAIS on their own behalf must complete the following steps:

Step 1: Successfully login to the CAT Reporter Portal – CAIS Test Environment and connect to SFTP, if applicable.

Step 2: Determine the required certification level.

Required FDID Records Submission

All Reporters must provide production data for at least 75% of the FDID population or 1,000 records, whichever is fewer. For example:

# of FDIDs	75% of FDIDs	Minimum # of FDIDs for Production Certification
500	375	375
1000	750	750
1500	1125	1000
2500	1875	1000
4800	3600	1000

Required CAT Customer Records Submission

All CAT Customer Record(s) corresponding to the submitted FDID Records must be provided. For example, a joint account with two account holders and an authorized trader (e.g., power of attorney) would be submitted as one FDID Record with three associated Customer Records.

Required TID Types Submission

The CAT Customer Records for the submitted FDID Records must include at least one of each TID Type that is applicable for the Reporter, including:

- SSN/ITIN for a U.S. Natural Person
- EIN for a U.S. Legal Entity
- FOREIGN for a non-U.S. Natural Person or Legal Entity

For example, an Industry Member that does business with only U.S. Natural Person Customers must submit at least one SSN/ITIN TID Type; however, it would not report any EIN or FOREIGN TID Types

since it does not have any of these customer types. An Industry Member that has U.S. Natural Person, U.S. Legal Entity, and foreign Customers must report at least one SSN/ITIN, one EIN, and one FOREIGN TID Type.

Step 3: Successfully submit production data, per the required certification level identified in Step 2, with an error rate of 15% or less. Record the corresponding submission date(s).

Step 4: Upon completion of Steps 1 through 3, contact the FINRA CAT Helpdesk as outlined in [§7 Certify Testing Completion](#).

6.2. Production Readiness Requirements for Clearing Firms and CAT Reporting Agents

Clearing firms and CAT Reporting Agents that will report to CAIS on behalf of another Industry Member must complete the following steps:

Step 1: Successfully login to the CAT Reporter Portal – CAIS Test Environment. This must be completed by both the Industry Member and the clearing firm/CAT Reporting Agent. The clearing firm/CAT Reporting Agent must connect to SFTP, if applicable.

Step 2: The Industry Member must establish CAIS Reporting Relationships in the Test Environment, per [§5 Establish CAIS Reporting Relationships](#). These relationships are applicable to the Test Environment only. CAIS Reporting Relationships must be established separately in Production once access has been granted.

Step 3: Determine the required certification level.

Required FDID Records Submission

All clearing firms and CAT Reporting Agents must provide production data for at least 75% of the FDID population (aggregated across all Industry Members for which the organization submits data) or 1,000 records, whichever is fewer. For example:

Total # of FDIDs	75% of FDIDs	Minimum # of FDIDs for Production Certification
500	375	375
1000	750	750
1500	1125	1000

2500	1875	1000
4800	3600	1000

Clearing firms and CAT Reporting Agents that submit on behalf of multiple Industry Members may provide FDIDs from any combination of Industry Members. Consider a CAT Reporting Agent that submits on behalf of Industry Members A, B, C, and D, each of which have 1200 FDIDs, for a total of 4800 FDIDs. The CAT Reporting Agent can submit the required 1000 FDIDs in any combination across the four Industry Members, such as:

- 1000 FDIDs from A and zero FDIDs from B, C, and D
- 500 each from A and C, zero from B and D
- 333 from each of A and B, 334 from C, zero from D
- 250 each from A, B, C, and D.

Required CAT Customer Records Submission

All CAT Customer Record(s) corresponding to the submitted FDID Records must be provided. For example, a joint account with two account holders and an authorized trader (e.g., power of attorney) would be submitted as one FDID Record with three associated Customer Records.

Required TID Types Submission

The CAT Customer Records for the submitted FDID Records must include at least one of each TID Type where the clearing firm or CAT Reporting Agent reports on behalf of an Industry Member that has at least one CAT Customer with that TID Type, including:

- SSN/ITIN for a U.S. Natural Person
- EIN for a U.S. Legal Entity
- FOREIGN for a non-U.S. Natural Person or Legal Entity

For example, a CAT Reporting Agent that submits data only for Industry Members that exclusively do business with U.S. Natural Person Customers must submit the SSN/ITIN TID Type; however, it would not report any EIN or FOREIGN TID Types since it does not have any of these customer types. A CAT Reporting Agent that submits data for Industry Members that have U.S. Natural Person, U.S. Legal Entity, and foreign Customers must report at least one SSN/ITIN, one EIN, and one FOREIGN TID Type.

Step 4: Successfully submit production data, per the required certification level identified in Step 3, with an error rate of 15% or less. Record the corresponding submission date(s).

Step 5: Upon completion of Steps 1 through 4, contact the FINRA CAT Helpdesk as outlined in [§7 Certify Testing Completion](#).

6.3. Production Readiness Requirements for Industry Members Submitting via CAT Reporting Agents

Industry Members that will report to CAIS using a CAT Reporting Agent must perform the following:

Step 1: Successfully login to the CAT Reporter Portal – CAIS Test Environment.

Step 2: Establish CAIS Reporting Relationships in the Test Environment, per [§5 Establish CAIS Reporting Relationships](#). These relationships are applicable to the Test Environment only. CAIS Reporting Relationships must be established separately in Production once access has been granted.

Step 3: When the Industry Member's CAT Reporting Agent has successfully certified on behalf of the Industry Member, contact the FINRA CAT Helpdesk as outlined in [§7 Certify Testing Completion](#).

The Industry Member will need to confirm that all of its CAT Reporting Agents have certified for CAIS production reporting.

6.4. Production Readiness Requirements for Industry Members that Do Not Have Production FDIDs

Industry Members that have no FDIDs to report at this time are still encouraged to complete the testing certification process in order to efficiently onboard in the future if and when necessary. Industry Members with no FDIDs that wish to complete testing certification must complete the following steps:

Step 1: Successfully login to the CAT Reporter Portal – CAIS Test Environment. This must be completed by both the Industry Member and the clearing firm/CAT Reporting Agent (if applicable). Self-reporting firms and the clearing firm/CAT Reporting Agent must connect to SFTP, if applicable.

Step 2: Establish CAIS Reporting Relationships in the Test Environment per [§5 Establish CAIS Reporting Relationships](#), if applicable. This must be completed by the Industry Member. These relationships are applicable to the Test Environment only. CAIS Reporting Relationships must be established separately in Production once access has been granted.

Step 3: Successfully submit mock data to demonstrate the ability to successfully format data for and transmit data to the CAIS system. Record the corresponding submission date(s). See [§6.1](#) (for self-reporting firms) or [§6.2](#) (for clearing firms and CAT Reporting Agents) for additional details on the requirements for submission of FDID Records, Customer Records, and TID Types.

Step 4: Upon completion, contact the FINRA CAT Helpdesk as outlined in [§7 Certify Testing Completion](#).

7. Certify Testing Completion

Once Industry Members and CAT Reporting Agents have completed all onboarding steps, including the successful completion of production readiness testing, each Industry Member and CAT Reporting Agent must contact the FINRA CAT Help Desk at 888-696-3348 or help@finracat.com. The FINRA CAT Help Desk will require the submission date(s) on which the testing occurred.

Upon verification of the onboarding steps by FINRA CAT, Industry Members and CAT Reporting Agents will be granted access to the CAIS Production Environment and a notification confirming access will be sent.

CAIS Reporting Relationships must be created and managed in each environment separately. Relationships created in the Test Environment, Production Mirror Environment, and Production Environment will not be ported into another environment. CAIS Reporting Relationships must be independently established in Industry Test, Production Mirror, and/or Production as needed to support the submission of data to the respective environment.