## **CAIS Technical Specifications Working Group**

August 27, 2024

# Agenda

- Overview
- 2. 2024 Year End Release Items
- 3. Clarifications and Other Updates
- 4. Deep Dive: FDID Refresh Report

#### Overview

- Version 2.2 of the CAIS Technical Specifications was published on July 18, 2024.
- Schemas were published on July 19, 2024:
  - Updated Outstanding Material Inconsistencies Data Feedback File Schema
  - New FDID Refresh Report Metadata File Schema
  - New FDID Refresh Report Data File Schema
- Updates include:
  - 2024 Year End Release
  - Clarifications and Other Updates
  - FDID Refresh Report

#### 2024 Year End Release

### Full CAIS Industry Member Release Rollout

Year End Release Industry Test: 9/16/2024 Production: 12/9/2024

- Extend maximum length of firstName and middleName to 200 characters
- Include up to 10 firmDesignatedID associations in the Outstanding Material Inconsistencies Data Feedback File.
- · New validations:
  - Error Code 22543: Invalid combination of ein and tidType
  - Error Code 22544: Conflicting ein and tidValue
- Disable Inconsistency Codes 30003 and 40003. No new 30003 and 40003 Inconsistency Codes (any previously generated 30003 and 40003 Inconsistency Codes that remain outstanding must be resolved)
- Error Code 22546: Unknown attribute on Customer Record
- Bug Fixes

FDID Refresh Report Release

ndustry Test: No later than 11/30

 The first FDID Refresh report will be compliance with the Periodic Custon Information Refresh requirement r p.m. Eastern Time on April 3, 202

### Year End Release Items- Industry Requests

- firstName and middleName field lengths extended to 200 characters
  - lastName extended to 200 characters in April 2022.
- Up to 10 firmDesignatedID associations included in the Outstanding Material Inconsistencies Data Feedback File
  - customerRecordID and JSON examples updated accordingly.
- ▶ New validations to prevent Material Inconsistencies on the *ein* field:
  - New Error Code 22543: Invalid combination of ein and tidType
  - New Error Code 22544: Conflicting ein and tidValue
    - Material Inconsistencies generated off ein will no longer be applicable
    - No new 30003 or 40003 Inconsistency Codes will be generated (any outstanding 30003 and 40003 inconsistencies must be resolved).

#### Year End Release Items - Other

▶ New Error Codes 22546: Unknown attribute on Customer Record.

### **Clarifications and Other Updates**

### Clarifications and Other Updates - Industry Request

Outstanding Material Inconsistencies Feedback: Effective August 19, 2024, provide the most recent submissionFilename with an active version of the Customer (rather than the most recent version of the Customer which may include an inactive/ended version of the Customer).

	CRD 5555									
Customer	Submission Filename	Customer Record ID	FDID	Accepted Date	Status					
Farida Chopra	123_5555_20231204_Group11_CAIS_000129	68	INDACCT	12/4/2023	Active (not Ended)					
Farida Chopra	123_5555_20240104_Group72_CAIS_000134	11	JNTACCT	1/4/2024	Active (not Ended)					
Farida Chopra	123_5555_20240723_Group04_CAIS_000861	192	JNTACCT	7/23/2024	Ended					

Interfirm Material Inconsistency was generated on 1/12/2025

Feedback for CRD 555 Includes								
Submission Filename	Submission Filename Customer FDID Record ID							
123_5555_20231204_Group11_CAIS_000129	68	INDACCT						

### Clarifications and Other Updates - Other

#### Clarifications:

- When an Industry Member uses multiple CAT Submitters to submit the same CAT Customer, if the submissions contain inconsistent data, an intrafirm Material Inconsistency will be generated for the CAT Customer.
- Error Code 22071 that the Customer(s) with trading capabilities must be active (not ended).
- Technical Descriptions for the correctionAction values of 'CORRECTION' and 'DELETE'.

#### Update:

 Added the format and compression extensions to the JSON examples of Outstanding Material Inconsistencies Feedback and Outstanding Rejections Metadata and Data Feedback.

# FDID Refresh Report

### Full CAIS Industry Member Release Rollout

Year End Release

Industry Test: 9/16/2024

Production: 12/9/2024

- Extend maximum length of firstName at to 200 characters
- Include up to 10 firmDesignated Outstanding Material Inconsists File.
- New validations:
  - Error Code 22543 tidType
  - Error Code 225
- Disable Inco 30003 and / generated

Err

FDID Refresh Report Release
Industry Test: No later than 11/30/2024
Production: 12/9/2024

 The first FDID Refresh report will be delivered for compliance with the Periodic Customer & Account Information Refresh requirement no later than 5:00 p.m. Eastern Time on April 3, 2025.

#### Periodic Customer and Account Refresh Requirements

- In accordance with CAT NMS Plan requirements, it is necessary for Industry Members to periodically refresh the Customer and Account information captured in CAIS by resubmitting previously accepted records.
- Any FDID Record that is active, that is, has no set *fdidEndDate* or has an *fdidEndDate* set to a date greater than the current calendar date, must be submitted to and accepted into CAIS no less often than every 12 calendar month period.
- Because the FDID Record must be submitted with the full current data and its associated CAT Customers, this will also result in refreshing the associated CAT Customer data on the same frequency.
- If an Industry Member submits an FDID Record prior to the refresh deadline, and it is accepted into CAIS, the 12 calendar month period will be reset from the date of the submission.
  - FDIDs that are accepted in daily submissions will have met the refresh requirement.

## FDID Refresh Report

- ▶ To assist with the refresh requirement, FINRA CAT will deliver an FDID Refresh Report.
- ▶ The FDID Refresh Report will contain a list of the Industry Member's active FDIDs that were last accepted at least 11 calendar months prior to the month of the report.
- ▶ To satisfy the periodic refresh requirement, Industry Members must submit to CAIS each FDID on the monthly FDID Refresh Report (with all associated LTIDs and Customers) without data validation errors.
- Any FDIDs that are subsequently accepted into CAIS will be removed from the subsequent report and the refresh deadline will be reset for those FDID Records.
- If the FDID is not submitted to CAIS, or is submitted to CAIS and is rejected, it will remain on the FDID Refresh Report until such time that it is either ended or is accepted into CAIS successfully.
- FDIDs that are not refreshed on or earlier than midnight Eastern Time on the last day of the 12 calendar month period will be included in the CAIS Report Cards as records overdue for refresh.

# FDID Refresh Report - Delivery Schedule

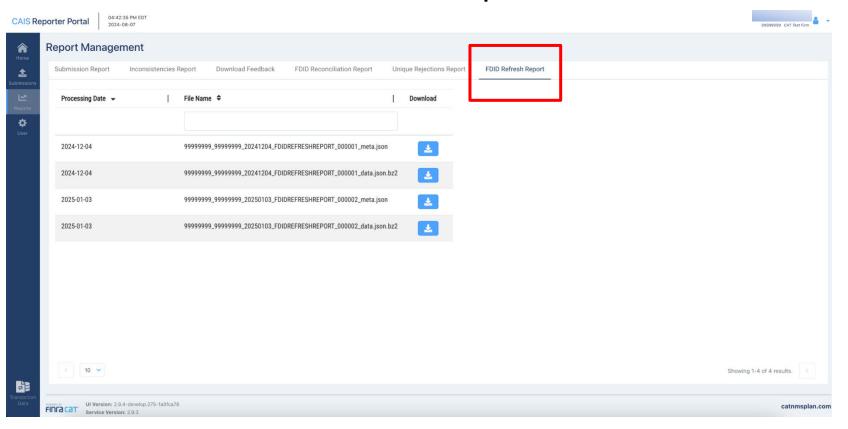
- ▶ The first FDID Refresh Reports are scheduled to be delivered in the Test Environment on December 3, 2024 and in the Production Environment on January 3, 2025 for testing.
- The first FDID Refresh Report will be delivered for compliance with the Periodic Customer & Account Information Refresh requirement no later than 5 p.m. ET on April 3, 2025.
  - All FDIDs on the April 3, 2025 FDID Refresh Report must be refreshed no later than midnight Eastern Time on May 31, 2025.
- ▶ The FDID Refresh Report will be available via SFTP and the CAT Reporter Portal – CAIS no later than 5 p.m. ET on the third CAT Trading Day of each following month.
  - Weekends or any day that all equities or options national securities exchanges are closed are not considered a CAT Trading Day.

## FDID Refresh Report File Rules

- ▶ An FDID Refresh Report will be delivered to CAT Submitters and CAT Reporter CRDs
- Delivery for each Submitter, CAT Reporter CRD and Correspondent CRD combination
- Files limited to 400,000 FDID Records
  - Industry Members with multiple submitters, correspondents and/or more than 400,000 FDIDs to refresh will get multiple reports
- JSON format with metadata and data file set:
  - Metadata File:
    - <CAT Submitter ID>\_<CAT Reporter CRD>\_<Correspondent CRD>\_<File Generation Date>\_<FDIDREFRESHREPORT>\_<Group>\_<File Type>.<Format Extension>
  - Data File:
    - <CAT Submitter ID>\_<CAT Reporter CRD>\_<Correspondent CRD>\_<File Generation</li>
       Date>\_<FDIDREFRESHREPORT>\_<Group>\_<File Type>.<Format Extension>.<Compression Extension>

## FDID Refresh Report File Location

- SFTP location: /submitterID/cat/cais/reports
- Portal location: On a new tab within Reports



### Sentinel Files

- A sentinel file will be posted to the SFTP directory to indicate that the operation ran successfully and is complete.
- If there are no FDID Records that require a refresh, only a sentinel file will be delivered.
- <File Generation Date>\_FDIDREFRESHREPORT\_processed
  - Example: 20250403\_FDIDREFRESHREPORT\_processed

#### Elements of an FDID Refresh Report Metadata File

Field Name	Data Type	JSON Object	Include Key	Description
catSubmitterID	Unsigned	Main	R	The ID of the firm that submitted the FDID Record requiring a refresh to CAT.
catReporterCRD	Unsigned	Main	R	The CRD of the Industry Member for which the FDID Refresh Report was generated.
correspondentCRD	Unsigned	Main	С	The CRD number of the related introducing broker or correspondent firm whose Customer and Account data is kept on record at the Industry Member reporting to CAT. Only populated when <i>correspondentCRD</i> was populated in the submission file.
fdidRefreshCount	Unsigned	Main	R	The total count of FDID Records requiring a refresh.
refreshReportFilename	Text (100)	Main	R	Name of the corresponding FDID Refresh Report Data File.

### Elements of an FDID Refresh Report Data File

Field Name	Data Type	JSON Object	Include Key	Description
firmDesignatedID	Text (40)	Main	R	The firmDesignatedID, as submitted to CAIS, of the record requiring a refresh.
lastAcceptedFilename	Text (100)	Main	R	The name of the CAIS Data File containing the most recently accepted submission of the FDID Record requiring refresh.
refreshDueDate	Date	Main	R	Date that the FDID Record and all associated records are/were required to be accepted by CAIS. Any FDID Records that are overdue for the refresh will retain the original <i>refreshDueDate</i> . Records requiring a refresh must be accepted by CAIS no later than midnight Eastern Time on the due date.
status	Choice	Main	R	<b>DUE</b> - Indicates that the Refresh Due Date is upcoming. <b>OVERDUE</b> - Indicates that the Refresh Due Date has passed.

### FDID Refresh Report Examples

FDID Refresh Report <b>Metadata</b> File Name	123_456_2_20250403_FDIDREFRESHREPORT_000001_meta.json
FDID Refresh Report <b>Metadata</b> File Contents	{"catSubmitterID": 123, "catReporterCRD": 456, "correspondentCRD": 2, "fdidRefreshCount": 3, "refreshReportFilename": "123_456_2_20250403_FDIDREFRESHREPORT_000001_data.json.bz2"}
FDID Refresh Report <b>Data</b> File Name	123_456_2_20250403_FDIDREFRESHREPORT_000001_data.json.bz2
FDID Refresh Report <b>Data</b> File Contents	{"firmDesignatedID": "FDID123", "lastAcceptedFilename": "123_456_20230527_CAIS_000001_data.json.bz2", "refreshDueDate": "20250531", "status": DUE}  {"firmDesignatedID": "A1ABFA", "lastAcceptedFilename": "123_456_20230115_CAIS_000001_data.json.bz2", "refreshDueDate": "20250531", "status": DUE}
	{"firmDesignatedID": "ABC123", "lastAcceptedFilename": "123_456_20230527_CAIS_000001_data.json.bz2", "refreshDueDate": "20250531", "status": DUE}

# FDID Refresh Report Examples

### Unrefreshed Active FDID

Submission Sequence	FDID	Status	FDID Last Accepted	Included in FDID Refresh Report	Due for FDID Refresh	Month Included as Overdue in Report Card (if not refreshed)
1	ABC123	Not Ended (Active)	April 24, 2022	April 3, 2025	May 31, 2025	(May 2025)
2	ABC123	Not Ended (Active)	October 31, 2022	April 3, 2025	May 31, 2025	(May 2025)
3	ABC123	Not Ended (Active)	May 31, 2024	April 3, 2025	May 31, 2025	(May 2025)
4	ABC123	Not Ended (Active)	May 1, 2025	April 3, 2026	May 31, 2026	(May 2026)

- Unrefreshed active FDID Records will be included in the FDID Refresh Report.
- Active FDID Records submitted between the date that Production opened for Full CAIS submissions and the Full CAIS Compliance Date that remain unrefreshed will first appear on the FDID Refresh Report in April 2025 with a Due Date of May 31, 2025
- The FDID Refresh Report is run on a monthly basis and the due date is always the last day of the month.

### FDID Overdue for Refresh

Submission Sequence	FDID	Status	FDID Last Accepted	Included in FDID Refresh Report	Due for FDID Refresh	Month Included as Overdue in Report Card (if not refreshed)
1	ABC123	Not Ended (Active)	April 24, 2022	April 3, 2025	May 31, 2025	(May 2025)
2	ABC123	Not Ended (Active)	October 31, 2022	April 3, 2025	May 31, 2025	(May 2025)
3	ABC123	Not Ended (Active)	May 31, 2024	April 3, 2025	May 31, 2025	(May 2025)
4	ABC123	Not Ended (Active)	May 1, 2025	April 3, 2026	May 31, 2026	(May 2026)
	ABC123	Overdue as of as of July 1, 2026	May 1, 2025	April 3, 2026 May 5, 2026 June 3, 2026	May 31, 2026	<i>May 2026 June 2026</i>
5		Not Ended (Active)	July 2, 2026	June 3, 2027	July 31, 2027	(July 2027)

Overdue active FDID Records will be included in the FDID Refresh Report and will retain the original due date.

- When overdue active FDID Records are refreshed, they will be removed from the subsequent report and the refresh deadline will be reset.
  - They will next be included in the FDID Refresh Report in 11 months.
  - They will be due for a refresh by the last day of the month of the 12 calendar month period.

<sup>\*</sup>FDIDs that are overdue for a refresh and are subsequently resubmitted with an "End Reason/End Date" will be considered refreshed and will not be included in the following month's report.

# Previously Accepted & then Rejected FDID

Submission Sequence	FDID	Status	FDID Last Accepted	Included in FDID Refresh Report	Due for FDID Refresh	Month Included as Overdue in Report Card (if not refreshed)
1	ABC123	Not Ended (Active)	April 24, 2022	April 3, 2025	May 31, 2025	(May 2025)
2	ABC123	Not Ended (Active)	October 31, 2022	April 3, 2025	May 31, 2025	(May 2025)
3	ABC123	Not Ended (Active)	May 31, 2024	April 3, 2025	May 31, 2025	(May 2025)
4	ABC123	Not Ended (Active)	May 1, 2025	April 3, 2026	May 31, 2026	(May 2026)
5	ABC123	Not Ended (Active)	July 2, 2026	June 3, 2027	July 31, 2027	(July 2027)
6	ABC123	Rejected on June 13, 2027 ( <i>Unrepaired</i> as of July 1, 2027)	July 2, 2026	June 3, 2027 July 5, 2027	July 31, 2027	(July 2027)

Active FDIDs that were subsequently resubmitted, rejected and remain unrepaired as of the last day of the month will be included in the following month's FDID Refresh Report and will retain the original due date.

# FDID that was Never Accepted

Submission Sequence	FDID	Status	FDID Last Accepted	Included in FDID Refresh Report	Due for FDID Refresh	Month Included as Overdue in Report Card (if not refreshed)
1	ZYX987	Rejected (Unrepaired)	n/a	n/a	n/a	n/a

▶ FDIDs that were rejected and remain unrepaired will *not* be included in the FDID Refresh Report.

# FDID Accepted Daily

Subm Sequ	nission ence	FDID	Status	FDID Last Accepted	Included in FDID Refresh Report	Due for FDID Refresh	Month Included as Overdue in Report Card (if not refreshed)
	2	ZYX987	Not Ended (Active)	May 1, 2023	n/a	n/a	n/a
	3	ZYX987	Not Ended (Active)	May 2, 2023	n/a	n/a	n/a
	4	ZYX987	Not Ended (Active)	May 3, 2023	n/a	n/a	n/a
9	15	ZYX987	Not Ended (Active)	October 31, 2025	n/a	n/a	n/a

▶ FDIDs that are <u>accepted</u> in daily submissions will not appear on the FDID Refresh Report.

### "INACTIVE" FDID

Submission Sequence	FDID	Status	FDID Last Accepted	Included in FDID Refresh Report	Due for FDID Refresh	Month Included as Overdue in Report Card (if not refreshed)
2	ZYX987	Not Ended (Active)	May 1, 2023	n/a	n/a	n/a
3	ZYX987	Not Ended (Active)	May 2, 2023	n/a	n/a	n/a
4	ZYX987	Not Ended (Active)	May 3, 2023			
915	ZYX987	Not Ended (Active)	October 31, 2025			
916	ZYX987	Ended ("INACTIVE") (fdidEndDate = November 1, 2025)	November 1, 2025	n/a	n/a	n/a

FDIDs that are not overdue with any "End Reason" and an "End Date" within 11 months of the last accepted date will *not* be included in the FDID Refresh Report.

<sup>\*</sup>FDIDs that are overdue for a refresh and are subsequently resubmitted with an "End Reason" will be considered refreshed and will not be included in the following month's report.

## FDID that was Replaced with Another FDID

Submission Sequence	FDID	Status	FDID Last Accepted	Included in FDID Refresh Report	Due for FDID Refresh	Month Included as Overdue in Report Card (if not refreshed)
2	ZYX987	Not Ended (Active)	May 1, 2023	n/a	n/a	n/a
3	ZYX987	Not Ended (Active)	May 2, 2023	n/a	n/a	n/a
4	ZYX987	Not Ended (Active)	May 3, 2023			
915	ZYX987	Not Ended (Active)	October 31, 2025			
916	ZYX987	Ended ("INACTIVE")	November 1, 2025	n/a	n/a	n/a
917	ZYX987	Ended ("REPLACED" with firmDesignatedID "H1M0M") (fdidEndDate = January 15, 2026)	January 15, 2026	n/a	n/a	n/a

- In this example, firmDesignatedID ZYX987 will not appear on the FDID Refresh Report.
  - If firmDesignatedID "H1M0M" remains active and unrefreshed when the FDID Refresh Report is run in December 2027, it
    will appear on the FDID Refresh Report.

### FINRA CAT Helpdesk

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

Q&A

# 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.