CAT Alert 2019-02 April 29, 2019

CAT Reporting Technical Specifications for Industry Members - Final

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Summary

On April 29, 2019 the Participants of the CAT NMS, LLC and FINRA CAT LLC published the final version of the *CAT Reporting Technical Specifications for Industry Members*. This version incorporates industry feedback received since the publication of Drafts 1 and 2 of Version 1.1 published on February 28, 2019 and March 29, 2019, respectively.

High Level Summary of Changes

A clean version and a red-lined version of changes incorporated since the March 29, 2019 version have been published along with a change log to reflect all changes made, including those listed below:

- Streamlined wording throughout
- Updates to Glossary and Data Dictionary
- Clarified/Updated Linkage Keys
- Added Go-Live Dates
- Added Account Type of "Firm Average Price Account", Removed Account Type of "Combined"
- Updated the Delete File Process
- New Sections 6 & 7
- Added fields for corrections
- Modifications to MEOT/MEOTS
- Added Next/Prior Unlinked to Option Order Supplement

- Updated Market Access definitions to clarify DMA/SA for CAT reporting
- Additional explanation around representativeInd "YE"
- Added Cancel Flag and Cancel Timestamp on Order Fulfillment
- Updated Error Codes to include Linker Codes
- Changed Routing Origin and Routing Origin Type to Sender IMID and Sender IMID Type
- Changed Field Order

CAT Reporting Timelines Phases 2a and 2b

Phase	Firm Type	Event	Date
Equities 2a	Large and Small Industry Members that are OATS Reporters	Registration Deadline	June 27, 2019
	Large and Small Industry Members that are OATS Reporters	Industry Connectivity Testing opens	September 30, 2019
	Large and Small Industry Members that are OATS Reporters	Test Environment opens for file submission and data integrity validations	December 16, 2019
	Large and Small Industry Members that are OATS Reporters	Production Environment opens for file submission and data integrity validations	April 20, 2020
	Large and Small Industry Members that are OATS Reporters	Test Environment opens for Intra- firm Linkage validations	April 20, 2020
	Large and Small Industry Members that are OATS Reporters	Production Environment opens for Intra-firm Linkage validations	July 2020
	Large and Small Industry Members that are OATS Reporters	Test Environment opens for Firm to Firm Linkage validations	July 2020
	Large and Small Industry Members that are OATS Reporters	Production Environment opens for Firm to Firm Linkage validations	October 2020
	Large and Small Industry Members that are OATS Reporters	Test Environment opens for Exchange and TRF Linkage validations	September 2020
	Large and Small Industry Members that are OATS Reporters	Production Environment opens for opens for Exchange and TRF Linkage validations	October 2020

Phase	Firm Type	Event	Date
Options 2b	Large Industry Members	Test Environment opens for file submission and data integrity validations	December 16, 2019
	Large Industry Members	Production Environment opens for file submission and data integrity validations	May 18, 2020
	Large Industry Members	Test Environment opens for Intra- firm Linkage validations	April 2020
	Large Industry Members	Production Environment opens for Intra-firm Linkage validations	August 2020
	Large Industry Members	Test Environment opens for Firm to Firm Linkage validations	July 2020
	Large Industry Members	Production Environment opens for Firm to Firm Linkage validations	December 2020
	Large Industry Members	Test Environment opens for Exchange and TRF Linkage validations	September 2020
	Large Industry Members	Production Environment opens for opens for Exchange and TRF Linkage validations	December 2020

CAT Registration

On March 19, 2019, the CAT NMS Plan Participants presented the timelines and provided the documentation for Industry Members to register for reporting to the Consolidated Audit Trail (CAT).

Industry Members that must register for the CAT include: 1) Any member of a national securities exchange or national securities association (i.e., the Financial Industry Regulatory Authority or "FINRA") that receives or transmits orders or quotes in NMS stocks, exchange listed options or OTC equity securities; and 2) any third-party CAT Reporting Agent that is or will be authorized to submit data to the CAT on behalf of an Industry Member. The CAT Rules do not provide for any firms to be excluded or exempted from the CAT reporting obligation. CAT registration commenced March 18, 2019 and continues through June 27, 2019. All Industry Members who will have a CAT reporting obligation must register during this window, with information on registration found here.

The <u>registration form</u> is intended to capture information required for CAT reporting, including: Company Information, Registered Principal, CAT Report Source (Self Reporting or Vendor), Preferred Reporting Method, Types of Securities Traded, Reporting Phase, Small or Large Broker Dealer, and CAT Reporting Default IMID.

Once an Industry Member has registered there will be additional steps in getting set up to report to CAT including connectivity, CAT Reporter portal entitlement, and testing. Instructions regarding those steps will be provided in the near future.

Other Important Items

On May 10, 2019, the Participants and FINRA CAT, LLC will publish the companion *CAT Industry Member Reporting Scenarios* document. Please note that this document will continue be updated as necessary to incorporate reporting scenarios.

Additionally, the Participants and FINRA CAT, LLC will publish an updated version of the CAT *Reporting Technical Specifications for Industry Members* with additional links to Frequently Asked Questions and other resources to enrich the document. However, no protocol or material changes will be included in that update.

The Participants will be hosting an Industry Webinar in the middle of May 2019 to do a detailed walk through of the Technical Specification changes. Additional information will be published on the <u>www.catnmsplan.com</u> website.