
CAIS File & Record Update Models

11/2/2021

Agenda

- LTID Phase – Delta Files with Delta Records
- Full CAIS Phase – Delta Files with Full Records
- Examples

Refer to Section 3.5 of the CAIS Technical Specification for additional details regarding the Transition from LTID to Full Customer Reporting.

CAT NMS Plan Requirements

- The CAT NMS Plan prohibits PII data from being returned to CAT Reporters once submitted to CAIS
 - Feedback file only includes record pointers, such as customerRecordID or fdidRecordID, along with error codes
- Since CAT Reporters cannot view any data they've submitted to CAIS, challenges arise with reconciling what's stored in the Reporter's records vs. what they have submitted to CAIS

LTID Phase – Delta Files with Delta Records

- Only FDID attributes included in a submission were updated
- Existing fields not submitted remained unchanged in the database
- Unless included in the submission, associations remain unchanged as well
 - FDID to LTID associations
- Offered ability to submit minimal information to maintain state

Delta Files with Delta Records – Industry Feedback

- Current state of record cannot be viewed by Reporter after ingestion
 - Record state amended over several submissions will be hard to reconcile from original submission files
- Special-purpose NULL attributes (e.g., *fdidEndDateNULL* and *fdidEndReasonNULL*) were necessary to clear out previously reported values so that a firm could reopen an account or re-establish an LTID association
- Approach may result in residual associations (e.g. Addresses, LTIDs, Customer association) from prior submissions that are no longer valid

Full CAIS Phase – Delta Files with Full Records

- Each time an FDID is submitted to CAIS, its complete list of LTID and Customer associations must be included. The FDID cannot be updated without full restatement of the record.
- If an FDID is not present in a submission file, no change is made to the FDID nor its associations to LTIDs or Customers.
- When an FDID or Customer record is included in a submission, its complete state must be included (i.e., all relevant fields, as well as all LTID associations, Customer associations, and addresses).
 - An attribute of the FDID or Customer that is not included in the submission means that attribute will not be present on the “current state” of the record.
 - If a LTID or Customer association is omitted from an FDID record, it is implicitly ended with the date the submission was acknowledged by CAIS, with an End Reason of ‘ENDED’.

Delta Files with Full Records – Benefits

- Record state easier to reconcile, as it always matches the latest submitted state
- No chance for residual LTID or Customer associations which may no longer be valid
- Removal of separate NULL fields, simplifying complexity of submissions

Example 1: Updating LTID Data

Starting Database State

FDID	LTID	LTID END DATE
A	12345678	
A	99999999	

Delta File w/ Delta Records

FDID	LTID	LTID END DATE
A	12345678	

Database Outcome

FDID	LTID	LTID END DATE
A	12345678	
A	99999999	

Delta File w/ Full Records

FDID	LTID	LTID END DATE
A	12345678	

Database Outcome

FDID	LTID	LTID END DATE
A	12345678	
A	99999999	Jan 15

Example 2: Reactivating an FDID

Starting Database State

FDID	FDID END DATE
A	Jan 15

Delta Files w/ Delta Records

FDID	FDID END DATE	FDID END DATE NULL
A		true

Database Outcome

FDID	FDID END DATE
A	

Delta Files w/ Full Records

FDID	FDID END DATE
A	

Database Outcome

FDID	FDID END DATE
A	

Example 3.1: Ending Customer 1's Association

Starting Database State

FDID	CUSTOMER	ROLE END DATE
A	1	
A	2	

Full Records - Omitting Customer

FDID	CUSTOMER	ROLE END DATE
A	2	

Database Outcome

FDID	CUSTOMER	ROLE END DATE
A	1	Jan 15
A	2	

Example 3.2: Ending Customer 1's Association

Starting Database State

FDID	CUSTOMER	ROLE END DATE
A	1	
A	2	

Full Records – Submission of End Date

FDID	CUSTOMER	ROLE END DATE
A	1	Jan 15
A	2	

Database Outcome

FDID	CUSTOMER	ROLE END DATE
A	1	Jan 15
A	2	

FINRA CAT Helpdesk

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

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 - An audio prompt will indicate that your line has been unmuted.