

CAT CAIS Industry Member Reporting Scenarios

1/28/2022

Version 2.2

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Executive Summary

This document is a companion document to the [CAT Reporting Customer and Account Technical Specifications for Industry Members-CCID \("Technical Specifications"\)](#) and is provided to assist Industry Members in implementing the reporting requirements laid out in the Technical Specifications. This document illustrates the specific reporting requirements for customer and account information (as defined in the CAT NMS Plan). The scenarios illustrate the reporting requirements for Phase 2e, the Full Customer and Account Phase. Refer to the LTID Phase [Industry Member Reporting Scenarios Documents](#) for LTID Phase reporting requirements.

The reporting scenarios are presented in a separate document from the Technical Specifications to provide the greatest flexibility in the ability to modify or add scenarios as new questions are presented and data practices evolve. It is expected that changes and additions will be necessary for reporting scenarios with greater frequency than changes to the Technical Specifications that would be required when record format, field value changes, etc., occur. By maintaining a separate reporting scenarios document, reporting scenarios may be clarified or added without the need for a new version of the Technical Specifications.

This document contains interpretive guidance for Industry Member CAT Reporters with respect to how the Technical Specifications must be implemented. As such, any changes to this document are subject to the same review and approval process by the Operating Committee, pursuant to the CAT NMS Plan, as the Technical Specifications.

Version	Date	Author	Description
2.0	6/29/2021	Consolidated Audit Trail, LLC	Initial Publication for Full Customer and Account Phase
2.1	9/21/2021	Consolidated Audit Trail, LLC	Addition of scenarios for FDID Record Data. Addition of scenarios for FDID Addresses. Addition of scenarios for FDID Customer List and Roles. Addition of scenarios for transferring and receiving FDIDs. Addition of scenario for reporting a Correspondent Firm's FDIDs. Addition of scenarios for Large Trader IDs. Addition of scenarios for Natural Person Customers, including sole proprietorships. Addition of scenarios for Legal Entity Customers, including identifiers. Addition of scenarios for Customer Addresses. Addition of scenarios for replacing a Customer's Transformed Identifier ("TIDs"). Removal of "Trading Desk" reference from Scenario 4.1.1. Removal of 'BROKERAGE' <i>accountType</i> from Scenario 4.1.2.

Version	Date	Author	Description
			<p>Modifications to Scenario 4.1.3 to add <i>branchOfficeCRD</i> and remove the <i>largeTraderList</i>.</p> <p>Modifications to Scenario 4.2.2 to include the Reporter firm as an authorized trader, and noted the employee is dually registered as an RIA.</p> <p>Modifications to Scenario 4.2.4 to change the authorized trader's role from 'AUTHREP' to 'AUTH3RD'.</p> <p>Masked <i>firmDesignatedID</i> values used in each scenario.</p> <p>Addition of 'RELATIONSHIP' <i>accountType</i> in Relationship ID scenarios.</p> <p>Addition of 'BROKERAGE' <i>accountType</i> for FDIDs held at brokerage firms.</p> <p>Removal of <i>customerStartDate</i>, <i>customerEndDate</i>, and <i>customerEndReason</i> from scenarios.</p>
2.2	1/28/2022	Consolidated Audit Trail, LLC	<p>Addition of Section 5 – Material Inconsistency Reporting Scenarios.</p> <p>Modifications to Section 1 - Introduction.</p> <p>Modification to the <i>accountName</i> in Scenario 2.1.1.2 - Relationship FDIDs.</p> <p>Removed <i>fdidCustomerList</i> from Scenarios 2.1.2 – Ending an FDID and 2.1.3 – Ending an FDID Erroneously Reported to CAIS.</p> <p>Update to title and description, and addition of ending submission to Scenario 2.1.5 – Reopening an Erroneously Ended FDID.</p> <p>Addition of Scenario 2.1.6 – Repairing an FDID Rejection due to Rejected Customer.</p> <p>Clarifications in descriptions of Scenario 2.4.2 - Receiving Firm Submission, Scenario 3.1.1 - Name and Year of Birth, Section 3.3 - Customer Address, and Section 3.5 - Multiple Versions of a Customer Within a Submission File.</p> <p>Modification to customer record and addition of file-level attributes in Scenario 2.5.2 – Clearing Firm & Introducing Broker Reporting Custodied Account.</p> <p>Correction to <i>tidType</i> value in Scenario 2.6.1 - FDID with one LTID.</p> <p>Addition of optionality to Scenario 2.6.5 – Ending an LTID Association to an FDID.</p> <p>Addition of <i>doingBusinessAs</i> attribute and update to <i>customerType</i> attribute to Scenario 3.1.1 - Name and Year of Birth.</p> <p>Modifications to description and removal of <i>branchOfficeCRD</i> in Scenario 3.1.2 - Sole Proprietorship Using a Social Security Number.</p> <p>Addition of FDID records to Scenario 3.4.1 - Change in Customer's Input Identifier - Same TID Type.</p> <p>Addition of Scenario 3.4.3 – Correcting a Malformed TID Error.</p> <p>Update to description in Section 3.5 – Multiple Versions of a Customer.</p> <p>Updated <i>customerType</i> value and added FDID records in Scenario 3.5.1 – Natural Person Customer.</p>

Version	Date	Author	Description
			<p>Addition of Scenario 3.5.3 – Correcting a Customer Record Rejection Due to Another Version of Customer Being Rejected.</p> <p>Removal of <i>branchOfficeCRD</i> attribute from scenarios with firm-owned FDIDs.</p> <p>Update to title and description, and addition of 'ADVISER' <i>customerType</i> and removal of customer record in Scenario 4.2.2 - Account Holder and Authorized Trader Who is an Employee.</p> <p>Update to description, and correction to <i>customerType</i> and <i>accountName</i> values in Scenario 4.2.4 - DVP/RVP Account with a Clearing Number.</p> <p>Update to description to Scenario 4.2.5 - DVP/RVP Account with Bank Depository ID</p> <p>Correction to <i>fdidEndReason</i> value and addition of optionality for account structure and age of majority in Scenario 4.2.6 - UGMA/UTMA Custodied Account.</p> <p>Addition of Scenario 4.2.7 – Adding Holders or Authorized Traders to an FDID.</p> <p>Addition of customer record to Scenarios 5.2 – Resolving an Intra-Firm Material Inconsistency and 5.3 – Resolving an Inter-firm Material Inconsistency.</p> <p>Corrections to <i>largeTraderID</i> values in various scenarios.</p>

1. Introduction

This document is organized by reporting scenarios. For each scenario, a description of the scenario is provided and then is followed by specific JSON examples, illustrating the correct values to be populated for each field. All examples are illustrative and do not identify all applicable fields.

Industry Members are not required to change their books and records and/or business processes to conform with the scenarios depicted in the CAT CAIS Industry Member Reporting Scenarios document. In recognition of the variety of account structures, Customer roles and business practices, etc., the CAT CAIS system is flexible and can handle a number of reporting structures and business processes. The CAT CAIS Industry Member Reporting Scenarios document does not depict all possible CAT CAIS reporting scenarios and is not intended to suggest that these are the only ways Industry Members can report to CAT CAIS. It is important to note that Industry Members must adhere to the reporting requirements as set forth in the [CAT Reporting Customer and Account Information Technical Specifications for Industry Members-CCID](#).

All names, addresses, and identifiers data used for examples in the customer and account information reports are purely fictional for illustrative purposes only. Any resemblance to actual persons, organizations, or locations is purely coincidental.

All Transformed Identifiers (“TIDs”) included in the examples for Social Security Numbers, Individual Taxpayer Identification Numbers, or Employer Identification Numbers (collectively, SSN/ITIN and EIN), are generated from values that are outside of the acceptable range of assignment by the assigning body, and would fail CAT data validations if actually reported to the Customer & Account Information System (“CAIS”).

2. FDID Data Examples

This section illustrates sample scenarios for reporting account data, including required data for associated customers, in the CAIS JSON format. Each scenario will include a brief description and examples of the data for inclusion in the CAIS Data File and CAIS Transformed Identifiers (TIDs) File. Refer to Section 4 of the [CAT Reporting Customer and Account Technical Specifications for Industry Members](#) for additional information.

2.1. FDID Record Data

2.1.1. Reporting of FDID Open Date and FDID Type

2.1.1.1. Account FDIDs

This scenario illustrates the CAT reporting requirements for account dates and types. For FDIDs with an *fdidType* of 'ACCOUNT', the *fdidDate* represents the date on which the account was opened, or the Account Effective Date as defined in Section 1.1 of the CAT NMS Plan. The *accountType* describes the type(s) of account the FDID represents. In this example, the CAT Reporter firm submits an account which was opened on July 1, 2020. The CAT Reporter firm also reports one CAT Customer, who is the account holder.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A2042", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE", "MARGIN"], "accountName": "CustAcct1", "branchOfficeCRD": 99999, "fdidDate": 20200701, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "10 FIFTH AVE", "addrLine2": "SUITE 1000", "city": "BROOKLYN", "regionCode": "US-NY", "countryCode": "US", "postalCode": "11201" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20200701 }] }] }</pre>

File	Data
	<pre>] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "Melanie", "lastName": "Smith", "yearOfBirth": 1975, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "c68a96c6f6f640bb9b51bf406695d5668b1fe675f1c63cdc9d5257fb92e9b509" }] } </pre>

2.1.1.2. Relationship FDIDs

This scenario illustrates the CAT reporting requirements for FDID dates and types when the FDID represents a Relationship ID. The *fdidType* will be 'RELATIONSHIP', and the *accountType* array must include 'RELATIONSHIP' (but may also include other applicable values). The *fdidDate* will be the date on which the relationship was established. In this example, the CAT Reporter firm submits a Relationship ID FDID which was established on August 1, 2020. The CAT Reporter firm also reports one CAT Customer, who is the organization with which the relationship was established.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "REL9301", "fdidType": "RELATIONSHIP", "accountType": ["RELATIONSHIP"], "accountName": "REL WITH ABC", "branchOfficeCRD": 12345, "fdidDate": 20100801 "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 WATERS ST", "city": "JERSEY CITY", "regionCode": "US-NJ", </pre>

File	Data
	<pre> "countryCode": "US", "postalCode": "07097" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20100801 }] }, "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "ABC Company", "ein": "00-2839174", "customerType": ["NOTAPPLICABLE"], "lei": "H7483KRW1900BCTR7289" }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "e1109c873ffcc2edd7404819a6b8981638197aef5638c60bd0cfdb66b2585097" }] } </pre>

2.1.1.3. Entity ID FDIDs

This scenario illustrates the CAT reporting requirements for FDID dates and types when the FDID represents an Entity ID. The *fdidType* will be 'ENTITYID', and the *accountType* array must include 'ENTITYID' (but may also include other applicable values). In this example, the CAT Reporter firm has an employee that is a registered representative that has discretion over several client accounts held at their firm. The registered representative places an order that will later be allocated to individual client accounts. At the time the order is placed, there is no specific trading account that can be used for the FDID, so the firm uses an Entity ID FDID to represent the firm's discretionary relationship with the customer. Refer to [FAQ M15](#) for additional information regarding Entity IDs. The Entity ID was established on September 1, 2012 and this date is used as the *fdidDate*. The CAT Reporter firm also reports themselves as a customer associated to the FDID.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA0448", "fdidType": "ENTITYID", "accountType": ["ENTITYID", "FIRM"], "accountName": "ENTITY ID IA0448", "fdidDate": 20120901 "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 WATERS ST", "city": "JERSEY CITY", "regionCode": "US-NJ", "countryCode": "US", "postalCode": "07097" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20200901 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "CAT Reporter Firm Co.", "ein": "00-7588409", "customerType": ["BD"], "lei": "K117G549PCX9W217RTV4" }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "b576d37c9667b8de41cb8781051163cacda0a6bdb244612d0a7f0b9cd1c40ea1" }] } </pre>

2.1.2. Ending an FDID

This scenario illustrates the CAT reporting requirements when an account has previously been submitted to, and accepted by, CAT CAIS, but the account has since been closed. The CAT Reporter firm must

submit the FDID with an *fdidEndDate* and *fdidEndReason* populated. If any LTIDs were included in the original submission with an association to the FDID, the CAT Reporter firm would not be required to include the LTIDs in the resubmission, as ending the FDID will result in all LTID associations to the FDID also being ended. Any customer records included in the original submission with an association to the FDID will also be ended upon resubmission, regardless of whether they were included. It is not required to include the *fdidCustomerList* when ending an FDID. Unless otherwise specified, the *fdidEndDate* will be applied as the *roleEndDate* and *ltidEndDate*, if applicable – additionally, the *fdidEndReason* will be applied as the *roleEndReason* and *ltidEndReason*, if applicable.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA7774", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "CUSTOMER ACCOUNT1", "fdidEndDate": 20220814, "fdidEndReason": "ENDED", "fdidDate": 20080710, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "555 MARKET ST.", "city": "KANSAS CITY", "regionCode": "US-MO", "countryCode": "US", "postalCode": "64030" }] }] }</pre>
TIDs	<pre>{ "tidRecordList": [] }</pre>

2.1.3. Ending an FDID Erroneously Reported to CAIS

This scenario illustrates the CAT reporting requirements when an account has previously been submitted to, and accepted by, CAT CAIS, but the submission of the record was done in error. For this scenario, the CAT Reporter firm is able to resubmit the FDID record with an *fdidEndReason* of 'CORRECTION'. The submission must contain all required attributes for the FDID record, such as *fdidDate* and *accountType*. In this scenario, the CAT Reporter firm submits the account with an *fdidEndDate* and an *fdidEndReason* of 'CORRECTION'.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA1957", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "GEORGE SMITH INVESTMENTS", "branchOfficeCRD": 12345, "fdidEndDate": 20210715, "fdidEndReason": "CORRECTION", "fdidDate": 20090815, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "555 MARKET ST.", "city": "KANSAS CITY", "regionCode": "US-MO", "countryCode": "US", "postalCode": "64030" }] }] }</pre>
TIDs	<pre>{ "tidRecordList": [] }</pre>

2.1.4. FDID Replaced by Another FDID Within the Same Firm

This scenario illustrates the CAT reporting requirements when an account has previously been submitted to, and accepted by, CAT CAIS, and the account remains open at the Industry Member. However, due to a system migration or one of the limited circumstances outlined in [FAQ M16](#), the Industry Member is required to change the *firmDesignatedID* value representing the account to a different FDID within the firm's system. In this example, nothing about the account is changing except the FDID value itself – as such, the original *fdidDate* and *roleStartDate* from the replaced FDID should be used.

Original Submission

In the original submission, the CAT Reporter firm reports a firm-owned account which was opened on May 29, 2016. The firm reports themselves as the CAT Customer associated to the account.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA7484",</pre>

File	Data
	<pre> "fdidType": "ACCOUNT", "accountType": ["FIRM"], "accountName": "Firm Acct1", "branchOfficeCRD": 12345, "fdidDate": 20160529, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 WATERS ST", "city": "JERSEY CITY", "regionCode": "US-NJ", "countryCode": "US", "postalCode": "07097" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20160529 }] }, "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "CAT Reporting Firm LLC", "ein": "00-7481002", "customerType": ["BD"], "lei": "9W27C848HVB74QZ104K7" }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "fb14cd74537abf7c12ecb9c8fb73ceca416c6247fa31c6a205f9b5b57c768549" }] } </pre>

Replacing Submission

In accordance with the CAT CAIS Technical Specification document, any LTID-to-FDID and customer-to-FDID associations for the FDID that had not been ended prior to ending the FDID, will be ended at the time the FDID is ended. As such, it is not required to include the LTID-to-FDID associations in the submission with an explicit ending of the association unless the reporting firm determines the End Date of the association is not the same as the End Date of the FDID. The CAT Reporter firm can omit the

roleEndDate and *roleEndReason* for the replaced FDID's customer associations, and CAIS will cascade its *fdidEndDate* and *fdidEndReason* values to all active customer associations. The associations will not be moved to the replacing FDID record, and as such the firm must explicitly establish the LTID-to-FDID and customer-to-FDID associations to the replacing FDID. In the replacing submission, the CAT Reporter firm submits the account with an *fdidEndDate* and an *fdidEndReason* of 'REPLACED', in addition to the *replacedByFDID*. The CAT Reporter firm also reports one CAT Customer, who is the account holder.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA7484", "fdidType": "ACCOUNT", "accountType": ["FIRM"], "accountName": "Firm Acct1", "branchOfficeCRD": 12345, "fdidEndDate": 20210710, "fdidEndReason": "REPLACED", "replacedByFDID": "IA0005", "fdidDate": 20160529, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 WATERS ST", "city": "JERSEY CITY", "regionCode": "US-NJ", "countryCode": "US", "postalCode": "07097" }] }, { "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20160529 }] }], { "fdidRecordID": 2, "firmDesignatedID": "IA0005", "fdidType": "ACCOUNT", "accountType": ["FIRM"], "accountName": " Firm Acct1", "branchOfficeCRD": 12345, "fdidDate": 20210710, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 WATERS ST", "city": "JERSEY CITY", "regionCode": "US-NJ", </pre>

File	Data
	<pre> "countryCode": "US", "postalCode": "07097" }], "largeTraderList": [{ "largeTraderRecordID": 1, "largeTraderID": "999999999-9999", "ltidEffectiveDate": 20210710 }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20210710 }] }, "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "CAT Reporting Firm LLC", "ein": "00-7481002", "customerType": ["BD"], "lei": "9W27C848HVB74QZ104K7" }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "fb14cd74537abf7c12ecb9c8fb73ceca416c6247fa31c6a205f9b5b57c768549" }] } </pre>

2.1.5. Reopening an Erroneously Ended FDID

This scenario illustrates the CAT reporting requirements when an account has been previously submitted to, and accepted by, CAT CAIS, and subsequently ended for a reason other than 'REPLACED' in a later submission. In this example, the Industry Member erroneously ended an FDID record in CAIS when the underlying account was never closed. The Industry Member later reopens the FDID record in CAIS. The firm can accomplish this by excluding the *fdidEndDate* and *fdidEndReason* attributes within the resubmission, which will nullify these fields and reopen the FDID. The firm will also need to establish any necessary LTID-to-FDID and customer-to-FDID associations in the reactivating submission. In this

example, the CAT Reporter firm submits an account with the same data as previously submitted, including the *fdidDate*, but this time omits the *fdidEndDate* and *fdidEndReason* attributes. The CAT Reporter firm also reports one CAT Customer, who is the account holder.

Ending Submission

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A3019", "fdidType": "ACCOUNT", "accountType": ["INSTITUTION"], "accountName": "TRDNG ACCT IA3019", "branchOfficeCRD": 12345, "fdidDate": 20210706, "fdidEndDate": 20220815, "fdidEndReason": "ENDED", "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 WATERS ST", "city": "JERSEY CITY", "regionCode": "US-NJ", "countryCode": "US", "postalCode": "07097" }], "largeTraderList": [{ "largeTraderRecordID": 1, "largeTraderID": "88888888-9999", "ltidEffectiveDate": 20210706 }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20210706 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "Brokerage Firm LLC", "ein": "00-9102664", "customerType": ["BD"], "lei": "0R940KDF28W1Q774X9W" }] } </pre>

File	Data
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "12450da283530a402df4e624992ca69f3f9d3921660256d17388f23e18a7cc0f" }] }</pre>

Reopening Submission

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A3019", "fdidType": "ACCOUNT", "accountType": ["INSTITUTION"], "accountName": "TRDNG ACCT IA3019", "branchOfficeCRD": 12345, "fdidDate": 20210706, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 WATERS ST", "city": "JERSEY CITY", "regionCode": "US-NJ", "countryCode": "US", "postalCode": "07097" }], "largeTraderList": [{ "largeTraderRecordID": 1, "largeTraderID": "88888888-9999", "ltidEffectiveDate": 20210706 }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20210706 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, </pre>

File	Data
	<pre> "legalName": "Brokerage Firm LLC", "ein": "00-9102664", "customerType": ["BD"], "lei": "0R940KDF28W1Q774X9W" }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "12450da283530a402df4e624992ca69f3f9d3921660256d17388f23e18a7cc0f" }] } </pre>

2.1.6. Repairing an FDID rejection due to rejected customer

This scenario illustrates the CAT reporting requirements when an FDID has been rejected due to one or more of its associated customer records being rejected. If any associated customer records have an error, CAIS cannot accept any FDIDs associated to the customer because associated customer data has not been accepted into CAIS.

Original Submission

The customer record associated to the FDID is rejected due to a missing *legalName* (error code 22530), as the *legalName* attribute is required for Legal Entity CAT Customer records. Since one of its associated customer records was rejected, the FDID is rejected as well (error code 22048). Correcting the original *legalName* error will repair all associated rejections.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A4029", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "accountName": "TRDNG ACCT123", "fdidDate": 20060519 "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 WATERS ST", "city": "JERSEY CITY", "regionCode": "US-NJ", "countryCode": "US", </pre>

File	Data
	<pre> "postalCode": "07097" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20060519 }] }, "legalEntityCustomerList": [{ "customerRecordID": 1, "ein": "00-2677812", "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "2500fd15875fd8988cf9e1ef4b9e23a83ee157357274d633dfad5b3dad4ca48e" }] } </pre>

Correcting Submission

In this submission, the firm corrects the customer record rejection by adding a valid *legalName* to the record. This also results in resolution of the FDID rejection because all its customers are accepted into CAIS. The CAT Reporter firm is not required to provide the *rejectionID* or a *correctionList* since resubmission of the record with valid data will resolve the rejection.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A4029", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "accountName": "TRDNG ACCT123", "fdidDate": 20060519 "addressList": [{ "addrType": "ADDRESS1", </pre>

File	Data
	<pre> "addrLine1": "1 WATERS ST", "city": "JERSEY CITY", "regionCode": "US-NJ", "countryCode": "US", "postalCode": "07097" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20060519 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "Client Firm Inc.", "ein": "00-2677812", "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "2500fd15875fd8988cf9e1ef4b9e23a83ee157357274d633dfad5b3dad4ca48e" }] } </pre>

2.2. FDID Address

This section illustrates the CAT reporting requirements for addresses associated to accounts. Each FDID submission must contain at least one mailing address for the FDID, and may contain up to four total address records. If a previously stored address record is excluded in a subsequent submission of the FDID, the address record(s) that is not received will no longer be stored as an address of the FDID.

2.2.1. FDID with a Single Address

This scenario illustrates the CAT reporting requirements when a single address is associated to an account. The mailing address must be included in the FDID *addressList* with an *addrType* of 'ADDRESS1', as noted in [FAQ Q44](#). In this example, the CAT Reporter firm submits an account address

with three address lines. The CAT Reporter firm also reports one CAT Customer, who is the account holder.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A2115", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "IA2115 ACCT", "branchOfficeCRD": 99999, "fdidDate": 20070512, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "10 ELM STREET", "addrLine2": "BUILDING 5", "addrLine3": "STE 10", "city": "RICHMOND", "regionCode": "US-NC", "countryCode": "US", "postalCode": "28379" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20070512 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "William", "lastName": "Jones", "yearOfBirth": 1962, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "bf9cdf3fca1091bd7f916a8c84d2e765e0a57912c2e71672f98411c5bbf89e20" }] } </pre>

2.2.2. FDID with Multiple Addresses

This scenario illustrates the CAT reporting requirements when there are multiple addresses associated to an account. Up to four addresses may be included in the FDID *addressList*, each with a differing *addrType*. The mailing address must be included in the FDID *addressList* with an *addrType* of 'ADDRESS1', as noted in [FAQ Q44](#). When multiple address records are included, they must use the *addrType* values corresponding to the counts of address records – for example, if two addresses are included, they must be 'ADDRESS1' and 'ADDRESS2'. In this example, the CAT Reporter firm submits an account with three associated address records. The CAT Reporter firm also reports one CAT Customer, who is the account holder.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A0492", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "IA0492 ACCT", "branchOfficeCRD": 99999, "fdidDate": 20070512, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "10 ELM STREET", "addrLine2": "BUILDING 5", "addrLine3": "STE 10", "city": "RICHMOND", "regionCode": "US-NC", "countryCode": "US", "postalCode": "28379" }, { "addrType": "ADDRESS2", "addrLine1": "5 SOUTH 15TH ST.", "city": "RICHMOND", "regionCode": "US-NC", "countryCode": "US", "postalCode": "28378" }, { "addrType": "ADDRESS3", "addrLine1": "25 GARDEN WAY", "city": "SACRAMENTO", "regionCode": "US-CA", "countryCode": "US", "postalCode": "94203" }] }], }</pre>

File	Data
	<pre> "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20070512 }] }, "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "Mary", "lastName": "Williams", "yearOfBirth": 1998, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "735d981a98d179188535e0d6cc859d948efbf01bf7eca0f652768d809bb37360" }] } </pre>

2.3. FDID Customer List and Roles

This section illustrates CAT reporting requirements for FDID Customer Records within the *fdidCustomerList*. For each FDID, the *fdidCustomerList* object is used to describe the type of association that exists between the FDID and its customer(s).

2.3.1. FDID with a Single CAT Customer

This scenario illustrates CAT reporting requirements for an account associated to one CAT Customer, who is the account holder. In this example, the CAT Reporter firm submits an FDID with one account holder who has authorization to trade on the account.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A2449", </pre>

File	Data
	<pre> "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "Jason's Account", "branchOfficeCRD": 99999, "fdidDate": 20190812, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "10 ELM STREET", "addrLine2": "BUILDING 5", "addrLine3": "STE 10", "city": "RICHMOND", "regionCode": "US-NC", "countryCode": "US", "postalCode": "28379" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20190812 }] }, "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "Jason", "lastName": "Myers", "yearOfBirth": 1990, "customerType": ["NOTAPPLICABLE"] }]] </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "a783be7f766ff571c7a2181d86ff949054b92a6ca0d7b9b4b8c43226f4beb368" }] } </pre>

2.3.2. FDID with Multiple CAT Customers

This scenario illustrates CAT reporting requirements for an account associated to multiple CAT Customers who are holders of the account. In this example, the CAT Reporter firm submits an FDID with

one account holder who has trading authorization, and another holder who does not have trading authorization.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A3106", "fdidType": "ACCOUNT", "accountType": ["UGMA/UTMA", "BROKERAGE"], "accountName": "Bernard's UGMA Account", "branchOfficeCRD": 99999, "fdidDate": 20151101, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "555 PALM PLACE", "city": "RICHMOND", "regionCode": "US-NC", "countryCode": "US", "postalCode": "28379" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20151101 }, { "customerRecordID": 2, "role": "NTHOLDER", "roleStartDate": 20151101 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "Bernard", "lastName": "James", "yearOfBirth": 1960, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 2, "firstName": "Bernard", "lastName": "James", "nameSuffix": "JUNIOR", "yearOfBirth": 2000, "customerType": ["NOTAPPLICABLE"] }] } </pre>

File	Data
	} }
TIDs	{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "4932e10355dea95f31fbd77989b09aa641c49d3df28e7074ae5335e94f61d43f" }, { "customerRecordID": 2, "tidType": "SSN/ITIN", "tidValue": "7db347e0258d221252ca1f9e5e5913865f2c14f47b15ddefd0870edab89937e7" }] }

2.4. Transferring an FDID Due to a Corporate Event

This section illustrates CAT reporting requirements in the instance of account transfers from one CAT Reporter firm to another, resulting from corporate events such as mergers, acquisitions, or divestitures. This activity can occur via either automated transfer of accounts by the Plan Processor, or via reporting data to CAIS. The transferring firm must report the ending of the accounts to be transferred, while the receiving firm must report the CAT Reporter CRD of the transferring firm and the FDID by which the account was known at the transferring firm.

2.4.1. Transferring Firm Submission

This scenario illustrates CAT reporting requirements for the transferring CAT Reporter firm in the instance of all accounts of an acquired firm being transferred to the acquiring firm. In order to enact transfers of accounts, the transferring CAT Reporter must end the FDID by setting the *fdidEndReason* as 'TRANSFER'. The *fdidEndDate* represents the date on which the transfer occurred. Any LTID and customer associations to the FDID will be ended with the *fdidEndDate* as the *ltidEndDate* and *roleEndDate* respectively, and the *fdidEndReason* as *ltidEndReason* and *roleEndReason*. In this scenario, the transferring CAT Reporter firm submits three accounts with *fdidEndDates* and *fdidEndReasons* of 'TRANSFER'. The accounts must also be reported to CAIS by the CAT Reporter firm to whom the accounts are being transferred, as represented in **Reporting Scenario 2.4.2**.

File	Data
Data	{ "fdidRecordList": [{

File	Data
	<pre> "fdidRecordID": 1, "firmDesignatedID": "TransferredAcct1", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "Transferred FDID No. 1", "fdidEndDate": 20210718, "fdidEndReason": "TRANSFER", "fdidDate": 20110220, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "50 N MAPLE", "city": "KANSAS CITY", "regionCode": "US-MO", "countryCode": "US", "postalCode": "64031" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20110220 }, { "fdidRecordID": 2, "firmDesignatedID": "TransferredAcct2", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "Transferred FDID No. 2", "fdidEndDate": 20210718, "fdidEndReason": "TRANSFER", "fdidDate": 20040728, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "123 GROVE STREET", "city": "DES MOINES", "regionCode": "US-IA", "countryCode": "US", "postalCode": "50301" }], "fdidCustomerList": [{ "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20040728 }] }, { "fdidRecordID": 3, "firmDesignatedID": "TransferredAcct3", "fdidType": "ACCOUNT", </pre>

File	Data
	<pre> "accountType": ["BROKERAGE"], "accountName": "Transferred Acct No. 3", "fdidEndDate": 20210718, "fdidEndReason": "TRANSFER", "fdidDate": 19990823, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "10 WILLIAMS ST.", "city": "AMES", "regionCode": "US-IA", "countryCode": "US", "postalCode": "50014" }], "fdidCustomerList": [{ "customerRecordID": 3, "role": "TRDHOLDER", "roleStartDate": 19990823 }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "MARLENE", "lastName": "JAMES", "yearOfBirth": 1978, "customerType": ["NOTAPPLICABLE"] }], "legalEntityCustomerList": [{ "customerRecordID": 2, "legalName": "Securities Management Company", "ein": "00-9381116", "customerType": ["BD"], "lei": "L1W70VQDTR52K7361HM2" }, { "customerRecordID": 3, "legalName": "Brokerage Firm LLC", "ein": "00-1744025", "customerType": ["BD"] }]]] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, </pre>

File	Data
	<pre> "tidType": "SSN/ITIN", "tidValue": "22ed0a9add2445b711c6a4d1c2fd1962d4c3ec9a77e9473b7789e2c5394cecac" }, { "customerRecordID": 2, "tidType": "EIN", "tidValue": "fcf73b27ad39f7f4c443819ed240a921905baba8c0b7880244d287a832d9db5b" }, { "customerRecordID": 3, "tidType": "EIN", "tidValue": "ffa8a6ca8d04188ae7c0368cc52b908a2e12b1c95d5708b3699c6a83b7e24011" }] } </pre>

2.4.2. Receiving Firm Submission

This scenario illustrates the CAT reporting requirements for the receiving CAT Reporter firm in the instance of all accounts of an acquired firm being transferred to the acquiring firm. In order to report accounts received from the transferring firm, the receiving CAT Reporter must submit all transferred-in FDIDs with full data, including reestablishing applicable LTID and customer associations. The receiving firm must also report the transferring firm's CRD number as the *priorCATReporterCRD* ("5555" in this example), in addition to the FDID by which the account was known at the transferring firm as the *priorCATReporterFDID*. Both the *priorCATReporterCRD* and *priorCATReporterFDID* attributes must be included in all subsequent submissions of the FDID Record, unless the FDIDs are later replaced. In this example, the CAT Reporter firm submits three accounts it received from the Transferring Firm in **Reporting Scenario 2.4.1**.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "ReceivedAcct1", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "Received FDID No. 1" "fdidDate": 20210718, "priorCATReporterCRD": 5555, "priorCATReporterFDID": "TransferredAcct1", "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "50 N MAPLE", "city": "KANSAS CITY", </pre>

File	Data
	<pre> "regionCode": "US-MO", "countryCode": "US", "postalCode": "64031" }], "largeTraderList": [{ "largeTraderRecordID": 1, "largeTraderID": "77777777-7777", "ltidEffectiveDate": 20210718 }, { "largeTraderRecordID": 2, "largeTraderID": "ULT00001-7777", "ltidEffectiveDate": 20210718 }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20210718 }, { "fdidRecordID": 2, "firmDesignatedID": "ReceivedAcct2", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "Received FDID No. 2", "priorCATReporterCRD": 5555, "priorCATReporterFDID": "TransferredAcct2", "fdidDate": 20210718, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "123 GROVE STREET", "city": "DES MOINES", "regionCode": "US-IA", "countryCode": "US", "postalCode": "50301" }], "fdidCustomerList": [{ "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20210718 }] }, { "fdidRecordID": 3, "firmDesignatedID": "ReceivedAcct3", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], </pre>

File	Data
	<pre> "accountName": "Received Acct No. 3", "priorCATReporterCRD": 5555, "priorCATReporterFDID": "TransferredAcct3", "fdidDate": 20210718, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "10 WILLIAMS ST.", "city": "AMES", "regionCode": "US-IA", "countryCode": "US", "postalCode": "50014" }], "fdidCustomerList": [{ "customerRecordID": 3, "role": "TRDHOLDER", "roleStartDate": 20210718 }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "MARLENE", "lastName": "JAMES", "yearOfBirth": 1978, "customerType": ["NOTAPPLICABLE"] }], "legalEntityCustomerList": [{ "customerRecordID": 2, "legalName": "Securities Management Company", "ein": "00-9381116", "customerType": ["BD"], "lei": "103XWD77KJ3PV15CF39PR" }, { "customerRecordID": 3, "legalName": "Brokerage Firm LLC", "ein": "00-1744025", "customerType": ["BD", "ACCREDITED"], "lei": "950HRV3XZ99WJR1064P5" }] } } } } } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", </pre>

File	Data
	<pre> "tidValue": "22ed0a9add2445b711c6a4d1c2fd1962d4c3ec9a77e9473b7789e2c5394cecac" }, { "customerRecordID": 2, "tidType": "EIN", "tidValue": "fcf73b27ad39f7f4c443819ed240a921905baba8c0b7880244d287a832d9db5b" }, { "customerRecordID": 3, "tidType": "EIN", "tidValue": "ffa8a6ca8d04188ae7c0368cc52b908a2e12b1c95d5708b3699c6a83b7e24011" }] } </pre>

2.5. Reporting Custodied Accounts

2.5.1. Clearing Firm Reporting Accounts Custodied for a Correspondent

This scenario illustrates the CAT reporting requirements for accounts custodied by a clearing firm CAT Reporter for a correspondent. The clearing firm must populate the *correspondentCRD* attribute with the CRD number of the correspondent firm. The *correspondentCRD* attribute is at the main level within the JSON structure of the CAIS Data File, and as such will apply to all records within the file. The *correspondentCRD* attribute must not be included in the Identifiers File. If the clearing firm custodies accounts for multiple correspondent firms, accounts for each individual correspondent must be grouped into a separate file. Accounts of a clearing firm that are not correspondent accounts should not have the *correspondentCRD* attribute populated. In this example, the CAT Reporter submits two accounts – one custodied for a correspondent firm with a CRD of ‘1111’, and one custodied for a different correspondent firm with a CRD of ‘9999’. The CAT Reporter firm also reports one account holder for each account.

CAT Reporter’s Submission for Correspondent 1111

File	Data
Data	<pre> { "version": "2.0.0", "catReporterCRD": 123456, "catSubmitterID": 123456, "correspondentCRD": 1111, "fdidRecordCount": 1, "naturalPersonCustomerRecordCount": 0, "legalEntityCustomerRecordCount": 1, "fdidRecordList": [{ "fdidRecordID": 1, </pre>

File	Data
	<pre> "firmDesignatedID": "1A0012", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "CustAcct1", "fdidDate": 20200701, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "10 FIFTH AVE", "addrLine2": "SUITE 1000", "city": "BROOKLYN", "regionCode": "US-NY", "countryCode": "US", "postalCode": "11201" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20200701 }] }, "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "Broker Dealer LP", "ein": "00-6318395", "customerType": ["BD"], "lei": "3182VF640PQQVC538TRM" }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "803207d07b157664fbeat894cf97b4b55d2d1d80d04c927a6e5a85699f288f3e" }] } </pre>

CAT Reporter's Submission for Correspondent 9999

File	Data
Data	<pre> { "version": "2.0.0", "catReporterCRD": 123456, "catSubmitterID": 123456, </pre>

File	Data
	<pre> "correspondentCRD": 9999, "fdidRecordCount": 1, "naturalPersonCustomerRecordCount": 0, "legalEntityCustomerRecordCount": 1, "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA0013", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "CustAcct2", "fdidDate": 20190821, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "5 MARKET PL", "city": "DOVER", "regionCode": "US-DE", "countryCode": "US", "postalCode": "19901" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20190821 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "Introducing Broker Inc.", "ein": "00-1827314", "customerType": ["BD"], "lei": "W84CXZ63130LBPW783" }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "79f5bbfd2722ee984f4e57555cae03545deaf207c7acab6933001662f01ea0dc" }] } </pre>

2.5.2. Clearing Firm & Introducing Broker Reporting Custodied Account

This scenario illustrates the CAT reporting requirements when an account is in the custody of a clearing firm ("Clearing Firm") but originates orders through an introducing broker ("Introducing Broker"). In this example, each firm reports the account with the FDID assigned by their respective firm. The Clearing Firm reports the Introducing Broker's CRD in the *correspondentCRD* field, and reports the Introducing Broker's customer as the associated CAT Customer. The Introducing Broker does not provide a *correspondentCRD*, and reports one CAT Customer associated to the FDID.

Clearing Firm Submission

File	Data
Data	<pre> { "version": "2.0.0", "catReporterCRD": 123456, "catSubmitterID": 123456, "correspondentCRD": 55555, "fdidRecordCount": 1, "naturalPersonCustomerRecordCount": 0, "legalEntityCustomerRecordCount": 1, "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A6650", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "CustodiedAcct1", "fdidDate": 20130428, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "50 NORTH 100TH PLACE", "city": "SACRAMENTO", "regionCode": "US-CA", "countryCode": "US", "postalCode": "94204" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20130428 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": " Originating Customer Inc.", "ein": "00-3838211", "customerType": ["NOTAPPLICABLE"] }] } </pre>

File	Data
	<pre> }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "7b1599709a6bb3cce97df911d58abf8303aca660e309dc12639c15921ab0e6dd " }] } </pre>

Introducing Broker Submission

File	Data
Data	<pre> { "version": "2.0.0", "catReporterCRD": 55555, "catSubmitterID": 55555, "fdidRecordCount": 1, "naturalPersonCustomerRecordCount": 0, "legalEntityCustomerRecordCount": 1, "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "ACCT734923", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "CustomerAccount123", "fdidDate": 20130915, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "50 NORTH 100TH PLACE", "city": "SACRAMENTO", "regionCode": "US-CA", "countryCode": "US", "postalCode": "94204" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20130915 }] }], "legalEntityCustomerList": [{ </pre>

File	Data
	<pre> "customerRecordID": 1, "legalName": "Originating Customer Inc.", "ein": "00-3838211", "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "7b1599709a6bb3cce97df911d58abf8303aca660e309dc12639c15921ab0e6dd" }] } </pre>

2.6. Large Trader IDs (LTID)

2.6.1. FDID with one LTID

This scenario illustrates the CAT reporting requirements when an account is identified as being associated to a Large Trader. The CAT Reporter firm is required to report the account to CAT CAIS, as well as the associated LTID and customer data. The CAT Reporter firm also reports one CAT Customer, who is the account holder.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A8573", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "LargeTradingAccount", "branchOfficeCRD": 12345, "fdidDate": 20110928, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "5 TENTH AVE", "city": "DALLAS", "regionCode": "US-TX", "countryCode": "US", "postalCode": "28379" }], "largeTraderList": [{ "largeTraderRecordID": 1, </pre>

File	Data
	<pre> "largeTraderID": "55555555-5555", "ltidEffectiveDate": 20110928 }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20110928 }] }, "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "LARGE TRADING FIRM INC.", "ein": "00-2387493", "customerType": ["ACCREDITED"], "lei": "09G6RW788BH5XPLR2188" }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "fa42acd55af5624cfb2a3d8041a2064bf19158e67fc2dac4ee763605614e9809" }] } </pre>

2.6.2. FDID with one Unidentified Large Trader ID (ULTID)

This scenario illustrates the CAT reporting requirements when an FDID is identified as being required to report to CAT CAIS, where the FDID has an associated authorized trader identified as an Unidentified Large Trader ID. The CAT Reporter firm also reports one CAT Customer, who is the account holder.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A1948", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "ULTAcct1", "branchOfficeCRD": 12345, "fdidDate": 20151021, </pre>

File	Data
	<pre> "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "10 N MAPLE", "city": "NEW YORK", "regionCode": "US-NY", "countryCode": "US", "postalCode": "10011" }], "largeTraderList": [{ "largeTraderRecordID": 1, "largeTraderID": "ULT55555-0000", "ltidEffectiveDate": 20151021 }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20151021 }]], "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "ABC SECURITIES MANAGEMENT CO LLC", "ein": "00-2387493", "customerType": ["BD"], "lei": "09G6RW788BH5XPLR2188" }]] </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "10985f81879893df579b89bbcb8b6caa86977a33283cf7c48214d14349350e16" }] } </pre>

2.6.3. FDID with Multiple LTIDs

This scenario illustrates the CAT reporting requirements when an account is identified as having two Large Traders as authorized traders. The CAT Reporter firm is required to report the account to CAT CAIS, as well as the associated LTIDs. The CAT Reporter firm also reports two CAT Customers – one

who is the account holder, and one who is a Registered Investment Adviser (RIA) with authorization to trade on the account.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A1042", "fdidType": "ACCOUNT", "accountType": ["AVERAGE"], "accountName": "LargeTradingAccount2", "fdidDate": 20170605, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1000 PARKWAY DR", "city": "BALTIMORE", "regionCode": "US-MD", "countryCode": "US", "postalCode": "21201" }], "largeTraderList": [{ "largeTraderRecordID": 1, "largeTraderID": "444444444-4444", "ltidEffectiveDate": 20170605 }, { "largeTraderRecordID": 2, "largeTraderID": "333333333-4444", "ltidEffectiveDate": 20200910 }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20170605 }, { "customerRecordID": 2, "role": "AUTH3RD", "hasDiscretion": true, "roleStartDate": 20170605 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "Large Trader Firm Inc.", "ein": "00-8734291", </pre>

File	Data
	<pre> "customerType": ["ACCRDITED"], "lei": "R820KF73RWVX9104G22H" }, { "customerRecordID": 2, "legalName": "Registered Investment Mgmt Inc", "ein": "00-1821033", "customerType": ["RIC"], "lei": "22TR80KM4DWTZZ847W0P" }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "1584f467024cdd8c85bf9e122f889ef3f59bca766035a8e9b5956aa67a996a10" }, { "customerRecordID": 2, "tidType": "EIN", "tidValue": "b81f7a005b28df09e91179e5ea763156a436e9d0e815c6f76387d8c27c8ed0d6" }] } </pre>

2.6.4. FDID with both LTID and ULTID

This scenario illustrates the CAT reporting requirements when an account is associated to two Large Traders, with one being an Unidentified Large Trader. The CAT Reporter firm is required to report the account to CAT CAIS, as well as the associated LTIDs. The CAT Reporter firm also reports one CAT Customer, who is the account holder.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A0176", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "LargeTradingAccount3", "branchOfficeCRD": 12345, "fdidDate": 20130514, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "999 1ST PKWY", </pre>

File	Data
	<pre> "city": "BALTIMORE", "regionCode": "US-MD", "countryCode": "US", "postalCode": "21202" }], "largeTraderList": [{ "largeTraderRecordID": 1, "largeTraderID": "ULTID555-5555", "ltidEffectiveDate": 20130514 }, { "largeTraderRecordID": 2, "largeTraderID": "22222222-2222", "ltidEffectiveDate": 20150824 }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20130514 }, { "customerRecordID": 2, "role": "AUTH3RD", "hasDiscretion": true, "roleStartDate": 20150824 }] }, "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "ULT Corp.", "ein": "00-2398122", "customerType": ["ACCREDITED"], "lei": "79145G2WKPLR78BX205R" }, { "customerRecordID": 2, "legalName": "Registered Investment Mgmt Inc", "ein": "00-1821033", "customerType": ["RIC"], "lei": "22TR80KM4DWTZZ847W0P" }] }] </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", </pre>

File	Data
	<pre> "tidValue": "1aeefe40168d64ea816336de1a1d2eb8cd32df53de534d3fcd0ed52e290bb278" }, { "customerRecordID": 2, "tidType": "EIN", "tidValue": " b81f7a005b28df09e91179e5ea763156a436e9d0e815c6f76387d8c27c8ed0d6" }] } </pre>

2.6.5. Ending an LTID Association to an FDID

This scenario illustrates the CAT reporting requirements when an account has been previously submitted to, and accepted by, CAT CAIS, and one of the LTIDs associated to the FDID is determined to no longer be an authorized trader for the account. Any existing associations not included in the ending submission will be implicitly ended with the same *roleEndDate* and *roleEndReason* as the *fdidEndDate* and *fdidEndReason*. Ending this LTID's association to this FDID does not end its association to any other FDIDs. If the CAT Reporter must end this LTID's association to other FDIDs, it must submit the other FDIDs associated to the LTID record with the *ltidEndDate* and *ltidEndReason* for each FDID. In this example, the CAT Reporter firm submits an FDID associated to a Large Trader record with an *ltidEndDate* and *ltidEndReason* of 'ENDED'. The CAT Reporter firm also reports one CAT Customer, who is the account holder.

Option 1

In this example, the CAT Reporter firm chooses to explicitly end the LTID association by providing an *ltidEndDate* and *ltidEndReason*.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A4627", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "John's Trading Account", "branchOfficeCRD": 12345, "fdidDate": 20190924, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "15 N FIRST ST", "city": "TAMPA", "regionCode": "US-FL", </pre>

File	Data
	<pre> "countryCode": "US", "postalCode": "33601" }], "largeTraderList": [{ "largeTraderRecordID": 1, "largeTraderID": "11111111-0000", "ltidEffectiveDate": 20190924, "ltidEndDate": 20210721, "ltidEndReason": "ENDED" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20190924 }] }, "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "John", "lastName": "Miller", "yearOfBirth": 1962, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "e3dfeeab8484e64e741188e7e8f9746988882737310ae3e7f49fda75eddb7532" }] } </pre>

Option 2

In this example, the CAT Reporter firm chooses to omit the LTID association from the FDID, which results in the implicit ending of the LTID association on the date of submission.

File	Data
Data	<pre> { "fdidRecordList": [{ </pre>

File	Data
	<pre> "fdidRecordID": 1, "firmDesignatedID": "1A4627", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "John's Trading Account", "branchOfficeCRD": 12345, "fdidDate": 20190924, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "15 N FIRST ST", "city": "TAMPA", "regionCode": "US-FL", "countryCode": "US", "postalCode": "33601" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20190924 }] }, "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "John", "lastName": "Miller", "yearOfBirth": 1962, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "e3dfeeab8484e64e741188e7e8f9746988882737310ae3e7f49fda75eddb7532" }] } </pre>

2.6.6. Reestablishing an LTID Association to an FDID

This scenario illustrates the CAT reporting requirements when an account has an ended association to an LTID, but the association must be reactivated as the Large Trader regains authority to trade on the account. If more than one LTID is associated to the FDID, all LTIDs must be included in the submission.

In order to reestablish the LTID association, the CAT Reporter must resubmit the account and LTID association without an *ltidEndDate* or *ltidEndReason*. In this example, the CAT Reporter firm submits an account associated to a Large Trader record and omits the *ltidEndDate* and *ltidEndReason* attributes. The CAT Reporter firm also reports two CAT Customers.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A0593", "fdidType": "ACCOUNT", "accountType": ["ADVISED"], "accountName": "John's Advised Account", "branchOfficeCRD": 12345, "fdidDate": 20190924, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "15 N FIRST ST", "city": "TAMPA", "regionCode": "US-FL", "countryCode": "US", "postalCode": "33601" }], "largeTraderList": [{ "largeTraderRecordID": 1, "largeTraderID": "66666666-6666", "ltidEffectiveDate": 20190924 }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20190924 }, { "customerRecordID": 2, "role": "AUTH3RD", "hasDiscretion": true, "roleStartDate": 20190924 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "John", "lastName": "Miller", "yearOfBirth": 1962, </pre>

File	Data
	<pre> "customerType": ["NOTAPPLICABLE"] }], "legalEntityCustomerList": [{ "customerRecordID": 2, "legalName": "Big Investment Adviser Inc.", "ein": "00-3487888", "customerType": ["ADVISER"], }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "e3dfeeab8484e64e741188e7e8f9746988882737310ae3e7f49fda75eddb7532" }, { "customerRecordID": 2, "tidType": "EIN", "tidValue": "3ce543bba7e30b7c39edadf3a19e1c4ea708ab962c46423fd35af9d051fcd65e" }] } </pre>

3. Customer Data Scenarios

This section illustrates samples scenarios for reporting customer data in the CAIS JSON format. At least one customer must be associated to each FDID within a submission file, and customers cannot be reported to CAIS without being associated with at least one FDID record. Each scenario will include a brief description and examples of the data for inclusion in the CAIS Data File and CAIS Transformed Identifiers (TIDs) File. Refer to Section 4 of the [CAT Reporting Customer and Account Technical Specifications for Industry Members](#) for additional information.

3.1. Natural Person Customer

3.1.1. Name and Year of Birth

This scenario illustrates the CAT reporting requirements for Natural Person CAT Customers. Required attributes, such as *firstName* and *yearOfBirth* must be included for each Natural Person customer record in the CAIS Data File. All previously reported names of the customer will be retained in association to the currently submitted state of the record, even when the name value is not included in a subsequent submission of the customer. In this example, the CAT Reporter is submitting an FDID with an association to one Natural Person customer who became associated with the FDID when the account was opened. The CAT Customer in this example is a trust, but was reported to CAIS with an SSN as the Input Identifier, so the CAT Reporter must enter the name of the trust in the *doingBusinessAs* field.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A7758", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "CustAcct999", "branchOfficeCRD": 12345, "fdidDate": 20090312, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "150 SW ORANGE ST", "city": "BROOKLYN", "regionCode": "US-NY", "countryCode": "US", "postalCode": "11201" }] }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20090312 }] } </pre>

File	Data
	<pre> }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "John", "lastName": "Doe", "doingBusinessAs": "JOHN DOE LIVING TRUST", "yearOfBirth": 1982, "customerType": ["TRUST"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "56c4d1ee2fa66991602dc80580116d195ca362d7a0b5647fea17f3e104c97944" }] } </pre>

3.1.2. Sole Proprietorship Using a Social Security Number

This scenario illustrates the CAT reporting requirements when a customer is a sole proprietorship. In this case, the CAT Reporter does not have an EIN with which to generate a TID, so the firm uses the SSN of the sole proprietor. The CAT Reporter firm must supply required fields for a Natural Person customer, such as *firstName* and *yearOfBirth*. The *doingBusinessAs* field must be populated when reporting a CAT Customer as a Natural Person record that is a sole proprietorship, trust, or otherwise conducts business under a name other than the Natural Person’s legal name. . In this example, the firm is reporting an FDID with one account holder which is a sole proprietorship where the firm has the SSN of the owner and there is separate name under which the sole proprietorship operates.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A3013", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "Sole Prop Acct1", "fdidDate": 20150129, "addressList": [{ </pre>

File	Data
	<pre> "addrType": "ADDRESS1", "addrLine1": "10 MOCKINGBIRD LN", "city": "SALEM", "regionCode": "US-OR", "countryCode": "US", "postalCode": "97301" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20150129 }] },], "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "MARIE", "lastName": "JONES", "doingBusinessAs": "MARIE'S BAKED GOODS", "yearOfBirth": 1982, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "fe005258ee2114bcef531e2ff09d1fa3aea5a33dd2b32ee045d028d323386b1f" }] } </pre>

3.2. Legal Entity Customer

3.2.1. Name and Identifiers

This scenario illustrates the CAT reporting requirements for Legal Entity CAT Customers. Required attributes, such as *legalName* and *customerType*, must be included for each Legal Entity customer record in the CAIS Data File. All previously reported names of the customer will be retained in association to the currently submitted state of the record, even when the name value is not included in a subsequent submission of the customer. The Employer Identification Number (EIN) of the customer must be reported as the *ein* attribute if the Input Identifier used to generate the customer’s TID was an EIN. Additionally, the Legal Entity Identifier (LEI) of the customer must be reported as the *lei* attribute if known to the firm, and

must be provided if the Input Identifier used to generate the customer's TID was an LEI. In this example, the CAT Reporter is submitting to CAT CAIS an FDID with an association to one Legal Entity which was associated with the FDID when the account was opened.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA0867", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "Austin Corp", "branchOfficeCRD": 12345, "fdidDate": 20120520, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "5 MAPLE AVE", "city": "AUSTIN", "regionCode": "US-TX", "countryCode": "US", "postalCode": "73301" }] }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20120520 }] }, "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "Austin Corp", "ein": "00-9483717", "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "8f77654dbff9c5ab28f187a6d01e55288beb25db9ffc358aec8f3b030cc6d190" }] } </pre>

3.3. Customer Address

This section illustrates CAT reporting requirements for customer addresses. As explained in [FAQ Q44](#), in instances where an Industry Member maintains separate addresses at the account and customer level, then all such reasonably available addresses must be reported to CAIS. As there may be instances where an Industry Member does not maintain separate addresses at the customer level, it is acceptable to include a customer record in a submission file without any address records. The customer submission must contain all current address records maintained at the customer level, up to four. If there are more than four addresses stored for a single customer, the Industry Member may choose which four to report but apply such methodology consistently for any updates to the customer record. If a previously stored address record(s) is not included in a subsequent submission of a CAT customer record, the address record(s) that is not received will no longer be stored as an address for that CAT Customer record.

3.3.1. Customer with an Address Different from FDID Address

This scenario illustrates CAT reporting requirements for a customer with one address maintained by the firm at the customer level that is different than the account level address that was reported with the FDID record. In this example, the CAT Reporter firm submits a CAT Customer record with a single address record. The firm includes a different address on the FDID record than on the customer record.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A3618", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "TrdAcct555", "branchOfficeCRD": 12345, "fdidDate": 20120102, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "10 BRIDGE ST", "city": "BROOKLYN", "regionCode": "US-NY", "countryCode": "US", "postalCode": "11201" }] }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20120102 }] }</pre>

File	Data
	<pre>], "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "Anne", "lastName": "James", "yearOfBirth": 1982, "customerType": ["NOTAPPLICABLE"], "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "555 SHERMAN RD", "addrLine2": "SUITE 5", "city": "ALBANY", "regionCode": "US-NY", "countryCode": "US", "postalCode": "12084" }] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "40363dcbd2b778cf84e7e8c007c9930d56d42a9cdfc83b9871e5c1dbc7fecfb5" }] } </pre>

3.3.2. Customer with Multiple Addresses at the Customer Level

This scenario illustrates CAT reporting requirements for a customer having multiple addresses. When multiple address records are included, they must use the *addrType* values corresponding to the counts of addresses (for example, if two address records are included, they must be 'ADDRESS1' and 'ADDRESS2'). In this example, the CAT Reporter firm is submitting a CAT Customer with four address records.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A3330", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": " TradingAcct000", </pre>

File	Data
	<pre> "branchOfficeCRD": 99999, "fdidDate": 20061214, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "50 ELM DR", "addrLine2": "MAPLE BUSINESS PARK", "addrLine3": "SUITE 1500", "city": "CHICAGO", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60007" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20061214 }]], "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "Securities Trust LP", "ein": "00-1194272", "customerType": ["TRUST"], "lei": "F0441BKGX8D21099WZ83", "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "999 NORTH 5TH ST", "city": "CHICAGO", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60008" }, { "addrType": "ADDRESS2", "addrLine1": "20 MAGNOLIA RD", "addrLine2": "ROOM 10", "city": "CHICAGO", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60007" }, { "addrType": "ADDRESS3", "addrLine1": "500 S 100TH AVE", "addrLine2": "BLDG 2", "city": "CHICAGO", "regionCode": "US-IL", "countryCode": "US", </pre>

File	Data
	<pre> "postalCode": "60007" }, { "addrType": "ADDRESS4", "addrLine1": "PO BOX 12345", "city": "CHICAGO", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60010" }] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "af3e511c442cc7898c40299152b069fd3102e4a11b21b33ef773a5afbd4d11c2" }] } </pre>

3.4. Changes to Customer Transformed Identifiers

3.4.1. Change in Customer’s Input Identifier – Same TID Type

This scenario illustrates the CAT reporting requirements in the event that the Input Identifier which a CAT Reporter firm previously used to generate a Natural Person customer’s TID has been changed. The updated TID value for the CAT Customer must be propagated across all FDID associations at the CAT Reporter firm. In this example, the CAT Reporter firm reports the customer to CAIS for the first time using the customer’s ITIN as the Input Identifier.

Original Submission

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A0391", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "MARY’S ACCT", "branchOfficeCRD": 12345, "fdidDate": 20120129, </pre>

File	Data
	<pre> "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 PALM COURT", "city": "TAMPA", "regionCode": "US-FL", "countryCode": "US", "postalCode": "33601" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20120129 }] }, { "fdidRecordID": 2, "firmDesignatedID": "1A0395", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "MARY'S OTHER ACCT", "fdidDate": 20150916, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 PALM COURT", "city": "TAMPA", "regionCode": "US-FL", "countryCode": "US", "postalCode": "33601" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20150916 }] }, { "fdidRecordID": 3, "firmDesignatedID": "1A0397", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "MARY'S THIRD ACCT", "fdidDate": 20190613, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 PALM COURT", "city": "TAMPA", </pre>

File	Data
	<pre> "regionCode": "US-FL", "countryCode": "US", "postalCode": "33601" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20190613 }] }, "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "MARY", "lastName": "MILLER", "yearOfBirth": 1971, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "04f1772c416e037c0c0be238a5245110675bb7c92e58d95e4dfe9cc503246edd" }] } </pre>

Resubmission

After the customer was reported to CAIS, the customer gained U.S. citizenship and was assigned an SSN. The customer has notified the CAT Reporter firm of their newly assigned SSN. The CAT Reporter firm must report the customer to CAIS with the new Input Identifier, including values in the *replacedByTID* and *replacedByTIDType* fields to indicate the customer's Input Identifier has changed, resulting in a new TID. In the CAIS Data File, the firm must include a record for the customer being replaced, in addition to a record for the replacing customer. The firm also specifies a *roleEndDate* and *roleEndReason* of 'REPLACED' in the *fdidCustomerList* – these attributes must be included in order to indicate the previous customer record is no longer associated to the account. In the TIDs File, the firm must include a record for the customer's previous TID – noting the *replacedByTID* and *replacedByTIDType* – as well as a record for the customer's new TID.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A0391", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "MARY'S ACCT", "branchOfficeCRD": 12345, "fdidDate": 20120129, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 PALM COURT", "city": "TAMPA", "regionCode": "US-FL", "countryCode": "US", "postalCode": "33601" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20120129, "roleEndDate": 20220831, "roleEndReason": "REPLACED" }, { "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20220831 }] }, { "fdidRecordID": 2, "firmDesignatedID": "1A0395", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "MARY'S OTHER ACCT", "fdidDate": 20150916, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 PALM COURT", "city": "TAMPA", "regionCode": "US-FL", "countryCode": "US", "postalCode": "33601" }], "fdidCustomerList": [{ "customerRecordID": 2, </pre>

File	Data
	<pre> "role": "TRDHOLDER", "roleStartDate": 20150916 }] }, { "fdidRecordID": 3, "firmDesignatedID": "1A0397", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "MARY'S THIRD ACCT", "fdidDate": 20190613, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 PALM COURT", "city": "TAMPA", "regionCode": "US-FL", "countryCode": "US", "postalCode": "33601" }], "fdidCustomerList": [{ "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20190613 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "MARY", "lastName": "MILLER", "yearOfBirth": 1971, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 2, "firstName": "MARY", "lastName": "MILLER", "yearOfBirth": 1971, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "04f1772c416e037c0c0be238a5245110675bb7c92e58d95e4dfe9cc503246edd", </pre>

File	Data
	<pre> "replacedByTID": "ecacfeeee4fb716eb7817e96288ccdfdf03ed7c85b1f4ba3052fe44dbd158195a", "replacedByTIDType": "SSN/ITIN" }, { "customerRecordID": 2, "tidType": "SSN/ITIN", "tidValue": " ecacfeeee4fb716eb7817e96288ccdfdf03ed7c85b1f4ba3052fe44dbd158195a" }] }</pre>

3.4.2. Change in Customer’s Input Identifier – Differing TID Types

This scenario illustrates the CAT reporting requirements in the event that the Input Identifier which a CAT Reporter firm previously used to generate a Legal Entity customer's TID has been changed. In this example, the customer is a Legal Entity which was previously reported with an LEI as the Input Identifier. However, the Legal Entity has expanded to the U.S. and has obtained an EIN. The CAT Reporter firm must report the customer to CAIS with the new Input Identifier, including values in the *replacedByTID* and *replacedByTIDType* fields to indicate the customer's Input Identifier has changed, resulting in a new TID. In the CAIS Data File, the firm must include a record for the customer being replaced, in addition to a record for the replacing customer. In the TIDs File, the firm must include a record for the customer's previous TID – noting the *replacedByTID* and *replacedByTIDType* – as well as a record for the customer's new TID.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A1839", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "FOREIGN ACCT", "branchOfficeCRD": 12345, "fdidDate": 20050712, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "PRIVADA CALLE 1", "city": "CHIHUAHUA", "regionCode": "CHIHUAHUA", "countryCode": "MX", "postalCode": "31000" }] }, "fdidCustomerList": [</pre>

File	Data
	<pre> { "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20050712, "roleEndDate": 20220831, "roleEndReason": "REPLACED" }, { "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20220831 }] }, "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "BROKERS OF MEXICO INC.", "customerType": ["NOTAPPLICABLE"], "lei": "W01MVTR7289D03LRV81Z" }, { "customerRecordID": 2, "legalName": "BROKERS OF MEXICO INC.", "ein": "00-4884819", "customerType": ["NOTAPPLICABLE"], "lei": "W01MVTR7289D03LRV81Z" }] } } </pre>
TIDS	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "FOREIGN", "foreignTIDType": "LEI", "foreignTIDCountryCd": "MX", "tidValue": "9ea1a76e5e52ae60e89912f66225e54c7da42e79791d5637822b69c75a210d83", "replacedByTID": "d63633e6049236992117c19701210f84b6342aa76cd3a8c98dee1bdd783c84a2", "replacedByTIDType": "EIN" }, { "customerRecordID": 2, "tidType": "EIN", "tidValue": "d63633e6049236992117c19701210f84b6342aa76cd3a8c98dee1bdd783c84a2" }] } </pre>

3.4.3. Correcting a Malformed TID Error

This scenario illustrates the CAT reporting requirements in the event that a CAT Reporter firm has submitted a malformed TID to CAIS and must correct the error. In this example, the CAT Customer has an *ein* of '00-1987445', however the Input Identifier used to generate the customer's TID contains an extra dash ('00--1987445'). In the correcting submission, the CAT Reporter corrects the malformed TID error by including a *correctingCustomerRecordID* for the valid customer record.

Original Submission

In this example, the Original Submission has a malformed TID error with *rejectionID* '12345' (error code 24907). The firm creates a Correcting Submission that includes the correct customer record and corresponding TID, noting the *correctionAction* of 'CORRECTION' in the *correctionList*.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA0867", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "Bridge Corp", "fdidDate": 20120520, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "5 MAPLE AVE", "city": "AUSTIN", "regionCode": "US-TX", "countryCode": "US", "postalCode": "73301" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20120520 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "Bridge Corp", "ein": "00-1987445", "customerType": ["NOTAPPLICABLE"] }] }</pre>

File	Data
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "33c1420dffc371e105c0a469e3566c0ee9b45ddc26a93ae238b2a7db4c624828" }] }</pre>

Correcting Submission

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA0867", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "Bridge Corp", "fdidDate": 20120520, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "5 MAPLE AVE", "city": "AUSTIN", "regionCode": "US-TX", "countryCode": "US", "postalCode": "73301" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20120520 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "Bridge Corp", "ein": "00-1987445", "customerType": ["NOTAPPLICABLE"] }], "correctionList": [{ "rejectionID": 12345, </pre>

File	Data
	<pre> "correctionAction": "CORRECTION", "correctingCustomerRecordID": 1 }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "3fb5f53b2266b80eab62eeb791b7294577b22b73cf25d028d9284591753aa86f " }] } </pre>

3.5. Multiple Versions of a Customer Within a Submission File

This scenario illustrates the CAT reporting requirements in the event that a CAT Reporter firm has multiple versions of a single customer, as reconciled to a single Input Identifier and therefore single TID. It is permitted to include the multiple versions of the customer within the submission files, with differing *customerRecordID* values. Each version of the CAT Customer, however, must not contain data materially different from other versions of the customer within the same file if this would result in a Material Inconsistency as set forth in Table 3 of the [CAT Reporting Customer and Account Information Technical Specifications for Industry Members-CCID](#). The data stored in CAIS will consist of the merged set of entries across the submitted versions of the customer.

3.5.1. Natural Person Customer

This scenario illustrates the CAT reporting requirements in the event that a CAT Reporter firm has multiple versions of a single Natural Person customer. In this example, the CAT Reporter firm is submitting two versions of a single Natural Person customer, associated to three different FDIDs. A total of three unique addresses will be stored in CAIS for the customer in this example. Additionally, a total of two names will be stored for this customer, each with a timestamp of receipt. All names and addresses across all FDIDs associated to this customer will be made available for Regulator query.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A4041", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], </pre>

File	Data
	<pre> "accountName": "JimsTrdngAcct", "branchOfficeCRD": 12345, "fdidDate": 20140624, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "999 South 1st Circle", "city": "Trenton", "regionCode": "US-NJ", "countryCode": "US", "postalCode": "08616" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20140624 }] }, { "fdidRecordID": 2, "firmDesignatedID": "1A8961", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "JimsTrdngAcct2", "branchOfficeCRD": 12345, "fdidDate": 20160817, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "999 South 1st Circle", "city": "Trenton", "regionCode": "US-NJ", "countryCode": "US", "postalCode": "08616" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20160817 }] }, { "fdidRecordID": 3, "firmDesignatedID": "1B0987", "fdidType": "ACCOUNT", "accountType": ["TRUST"], "accountName": "JAMES WILLIAMS LIVING TRUST", "fdidDate": 20160920, "addressList": [</pre>

File	Data
	<pre> { "addrType": "ADDRESS1", "addrLine1": "999 South 1st Circle", "city": " Trenton", "regionCode": "US-NJ", "countryCode": "US", "postalCode": "08616" }], "fdidCustomerList": [{ "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20160920 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "Jim", "middleName": "R.", "lastName": "Williams", "yearOfBirth": 1972, "customerType": ["NOTAPPLICABLE"], "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "999 South 1st Circle", "city": "Trenton", "regionCode": "US-NJ", "countryCode": "US", "postalCode": "08616" }] }, { "customerRecordID": 2, "firstName": "James", "lastName": "Williams", "doingBusinessAs": "JAMES WILLIAMS LIVING TRUST", "yearOfBirth": 1972, "customerType": ["TRUST"], "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "999 South 1st Circle", "city": "Trenton", "regionCode": "US-NY", "countryCode": "US", "postalCode": "08616" }], { "addrType": "ADDRESS2", </pre>

File	Data
	<pre> "addrLine1": "5 North Market St", "city": "Trenton", "regionCode": "US-NY", "countryCode": "US", "postalCode": "08616" }, { "addrType": "ADDRESS3", "addrLine1": "1 Palm Pl", "addrLine2": "Suite 3", "city": "Trenton", "regionCode": "US-NY", "countryCode": "US", "postalCode": "08617" }] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "360ae6aeb548ab78ffcb9032ac5213ec74d0017c229078fdca586b663d20d13e" }, { "customerRecordID": 2, "tidType": "SSN/ITIN", "tidValue": "360ae6aeb548ab78ffcb9032ac5213ec74d0017c229078fdca586b663d20d13e" }] } </pre>

3.5.2. Legal Entity Customer

This scenario illustrates the CAT reporting requirements in the event that a CAT Reporter firm has multiple versions of a single Legal Entity customer. In this example, the CAT Reporter firm is submitting three versions of a single Legal Entity customer, associated to three different FDIDs. A total of six unique addresses will be stored in CAIS for the Legal Entity Customer in this example, as differing addresses were submitted for each instance of the customer. Additionally, a total of three Legal Names will be stored for this customer, each with a timestamp of receipt. All names and addresses across all associated FDIDs associated to this customer will be made available for Regulator query.

File	Data
Data	<pre> { "fdidRecordList": [</pre>

File	Data
	<pre> { "fdidRecordID": 1, "firmDesignatedID": "1A3310", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "First LE Account", "branchOfficeCRD": 12345, "fdidDate": 20070802, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "10 NORTH PALM ST.", "city": "NAPLES", "regionCode": "US-FL", "countryCode": "US", "postalCode": "34102" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20070802 }] }, { "fdidRecordID": 2, "firmDesignatedID": "IA3311", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "Second LE Account", "branchOfficeCRD": 12345, "fdidDate": 20140920, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "5000 SPRING WAY", "city": "PITTSBURGH", "regionCode": "US-PA", "countryCode": "US", "postalCode": "15106" }], "fdidCustomerList": [{ "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20140920 }] }, { "fdidRecordID": 3, "firmDesignatedID": "IA3312", </pre>

File	Data
	<pre> "fdidType": "ACCOUNT", "accountType": ["DVP/RVP", "BROKERAGE"], "primeBrokerID": ["BRK1"], "accountName": "Third LE Account", "branchOfficeCRD": 99999, "fdidDate": 20110106, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "10 PINEAPPLE PL", "city": "BALTIMORE", "regionCode": "US-MD", "countryCode": "US", "postalCode": "21213" }], "fdidCustomerList": [{ "customerRecordID": 3, "role": "TRDHOLDER", "roleStartDate": 20110106 }] }, "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "XYZ Securities Management L.L.C.", "ein": "00-9192311", "customerType": ["BD"], "lei": "88372RGFK892W105VM33", "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "10 NORTH PALM ST.", "city": "NAPLES", "regionCode": "US-FL", "countryCode": "US", "postalCode": "34102" }, { "addrType": "ADDRESS2", "addrLine1": "12 NORTH PALM ST.", "city": "NAPLES", "regionCode": "US-FL", "countryCode": "US", "postalCode": "15106" }] }, { "customerRecordID": 2, "legalName": "XYZ SEC MGMT LLC", "ein": "00-9192311", </pre>

File	Data
	<pre> "customerType": ["BD"], "lei": "88372RGFK892W105VM33", "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "5000 SPRING WAY ", "city": "PITTSBURGH", "regionCode": "US-PA", "countryCode": "US", "postalCode": "15106" }] }, { "customerRecordID": 3, "legalName": "XYZ SECURITIES MGMT, LLC", "ein": "00-9192311", "customerType": ["BD"], "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "10 PINEAPPLE PL", "city": "BALTIMORE", "regionCode": "US-MD", "countryCode": "US", "postalCode": "21213" }, { "addrType": "ADDRESS2", "addrLine1": "600 SOUTH THIRD ST", "city": "CHICAGO", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60606" }, { "addrType": "ADDRESS3", "addrLine1": "1 CASTLE DRIVE", "addrLine2": "SUITE 3", "city": "BALTIMORE", "regionCode": "US-MD", "countryCode": "US", "postalCode": "21213" }] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": " e860f1d1ca4c1e7de86468752dba08f69143522bf245dd3f8377286f920c4308" }] } </pre>

File	Data
	<pre> }, { "customerRecordID": 2, "tidType": "EIN", "tidValue": " e860f1d1ca4c1e7de86468752dba08f69143522bf245dd3f8377286f920c4308" }, { "customerRecordID": 3, "tidType": "EIN", "tidValue": "e860f1d1ca4c1e7de86468752dba08f69143522bf245dd3f8377286f920c4308" }] } </pre>

3.5.3. Correcting a Customer Record Rejection Due to Another Version of Customer Being Rejected

This scenario illustrates the CAT reporting requirements when multiple versions of a single customer are submitted, but one version is rejected. In the event that a CAT Reporter firm has multiple versions of a single CAT Customer, as reconciled to a single Input Identifier and therefore a single TID, it is permitted to include the versions of the CAT Customer within the submission files, with differing *customerRecordID* values. In this instance, all other versions of the customer (regardless of FDID associations) will be rejected. In order to resolve all rejections, the CAT Reporter firm must resolve the original customer record rejection. In this example, *customerRecordID* '1' is rejected due to a missing *legalName* (error code 22530) when *legalName* is a required attribute for Legal Entity CAT Customers. It is not required to have the same *legalName* for all versions of the same CAT Customer. Subsequent versions of the same customer are rejected with error code 22529.

Original Submission

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A5971", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "First LE Account", "fdidDate": 20070802, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "10 NORTH PALM ST.", "city": "NAPLES", </pre>

File	Data
	<pre> "regionCode": "US-FL", "countryCode": "US", "postalCode": "34102" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20070802 }] }, { "fdidRecordID": 2, "firmDesignatedID": "IA5970", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "Second LE Account", "fdidDate": 20140920, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "5000 SPRING WAY", "city": "PITTSBURGH", "regionCode": "US-PA", "countryCode": "US", "postalCode": "15106" }], "fdidCustomerList": [{ "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20140920 }] }, { "fdidRecordID": 3, "firmDesignatedID": "IA3087", "fdidType": "ACCOUNT", "accountType": ["DVP/RVP", "BROKERAGE"], "primeBrokerID": ["BRK1"], "accountName": "Third LE Account", "fdidDate": 20110106, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "10 PINEAPPLE PL", "city": "BALTIMORE", "regionCode": "US-MD", "countryCode": "US", "postalCode": "21213" }] } </pre>

File	Data
	<pre>], "fdidCustomerList": [{ "customerRecordID": 3, "role": "TRDHOLDER", "roleStartDate": 20110106 }] }, "legalEntityCustomerList": [{ "customerRecordID": 1, "ein": "00-5239710", "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 2, "legalName": "CLIENT FIRM XYZ COMPANY", "ein": "00-5239710", "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 3, "legalName": "CLIENT FIRM XYZ CO.", "ein": "00-5239710", "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "7f6c1986eb60d1ee313c2055674e4d6c79f2ce78a2ae9f8f83a89b12ac459ff3" }, { "customerRecordID": 2, "tidType": "EIN", "tidValue": "7f6c1986eb60d1ee313c2055674e4d6c79f2ce78a2ae9f8f83a89b12ac459ff3" }, { "customerRecordID": 3, "tidType": "EIN", "tidValue": "7f6c1986eb60d1ee313c2055674e4d6c79f2ce78a2ae9f8f83a89b12ac459ff3" }] } </pre>

Correcting Submission

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A5971", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "First LE Account", "fdidDate": 20070802, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "10 NORTH PALM ST.", "city": "NAPLES", "regionCode": "US-FL", "countryCode": "US", "postalCode": "34102" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20070802 }] }, { "fdidRecordID": 2, "firmDesignatedID": "IA5970", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "Second LE Account", "fdidDate": 20140920, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "5000 SPRING WAY", "city": "PITTSBURGH", "regionCode": "US-PA", "countryCode": "US", "postalCode": "15106" }], "fdidCustomerList": [{ "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20140920 }] }, { "fdidRecordID": 3, "firmDesignatedID": "IA3087", </pre>

File	Data
	<pre> "fdidType": "ACCOUNT", "accountType": ["DVP/RVP", "BROKERAGE"], "primeBrokerID": ["BRK1"], "accountName": "Third LE Account", "fdidDate": 20110106, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "10 PINEAPPLE PL", "city": "BALTIMORE", "regionCode": "US-MD", "countryCode": "US", "postalCode": "21213" }], "fdidCustomerList": [{ "customerRecordID": 3, "role": "TRDHOLDER", "roleStartDate": 20110106 }] }, "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "CLIENT FIRM XYZ CO", "ein": "00-5239710", "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 2, "legalName": "CLIENT FIRM XYZ COMPANY", "ein": "00-5239710", "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 3, "legalName": "CLIENT FIRM XYZ CO.", "ein": "00-5239710", "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "7f6c1986eb60dlee313c2055674e4d6c79f2ce78a2ae9f8f83a89b12ac459ff3" }, { "customerRecordID": 2, </pre>

File	Data
	<pre> "tidType": "EIN", "tidValue": "7f6c1986eb60d1ee313c2055674e4d6c79f2ce78a2ae9f8f83a89b12ac459ff3" }, { "customerRecordID": 3, "tidType": "EIN", "tidValue": "7f6c1986eb60d1ee313c2055674e4d6c79f2ce78a2ae9f8f83a89b12ac459ff3" }] }</pre>

4. Customer and Account Reporting Scenarios

This section illustrates the combined customer and account data reporting requirements for common customer and account scenarios. Each scenario will include a brief description and examples of the data for inclusion in the CAIS Data File and CAIS Transformed Identifiers (TIDs) File. Refer to Section 4 of the [CAT Reporting Customer and Account Technical Specifications for Industry Members](#) for additional information.

4.1. Firm Owned Accounts

4.1.1. Firm Owned Account with only Employees authorized to trade

This scenario illustrates the CAT reporting requirements when a CAT Reporter Firm is reporting a firm-owned account, where the only CAT Customer on the account is the firm itself and the only parties authorized to trade in the account are employees of the CAT Reporter Firm. The CAT Reporter Firm is reported with a *role* of 'TRDHOLDER', as it is the beneficial holder of the account and is authorized to trade on the account, and the CAT Reporter Firm is not required to report their employees as Authorized Traders on the account. For purposes of this example, the CAT Reporter firm only stores the Address for the FDID record, and as such no Address is reported on the CAT Customer record. The *customerType* is set as BD, since the CAT Reporter firm is a US registered Broker/Dealer. The CAT Reporter firm also reports their Large Trader ID and Legal Entity Identifier (LEI).

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A4085", "fdidType": "ACCOUNT", "accountType": ["FIRM"], "accountName": "PropAcct1", "fdidDate": 20050821, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 WATERS ST", "city": "JERSEY CITY", "regionCode": "US-NJ", "countryCode": "US", "postalCode": "07097" }], "largeTraderList": [{ "largeTraderRecordID": 1, "largeTraderID": "00000000-0001", "ltidEffectiveDate": 20150101 }] }] }</pre>

File	Data
	<pre>], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20050821 }] }, "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "CAT Reporter Firm Name", "ein": "00-2192955", "customerType": ["BD"], "lei": "L49S8SWR48C4MFGH8ZH1" }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "8caf6f28a2e293d5a12b107afe11fee79a1a20d72c6b297290282a2a7f9f44bb" }] } </pre>

4.1.2. Reporting Multiple Firm Owned Accounts

This scenario illustrates the CAT reporting requirements when a CAT Reporter Firm is reporting multiple accounts that are owned by the firm, where the only CAT Customer on the accounts is the firm itself and the only parties authorized to trade in the accounts are employees of the CAT Reporter Firm. The CAT Reporter Firm is not required to report their employees as Authorized Traders on the accounts. It is acceptable to report all of the accounts in association with a single *customerRecordID* value within the *naturalPersonCustomerList* or *legalEntityCustomerList*, so that the firm does not need to duplicate the data of the CAT Customer for each account. The customer’s *role*, *roleStartDate*, *roleEndDate*, and *roleEndReason* do not need to be the same across each of the associated FDIDs. In this reporting structure, the single *customerRecordID* is associated to each FDID, however the CAT Customer data is present only once within the CAIS Data file and the TIDs file. The below example has three FDIDs, each with an association to the single *customerRecordID* value.

File	Data
Data	<pre> { "fdidRecordList": [{ </pre>

File	Data
	<pre> "fdidRecordID": 1, "firmDesignatedID": "1A9574", "fdidType": "ACCOUNT", "accountType": ["FIRM"], "accountName": "PropAcct1", "fdidDate": 20050821, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 WATERS ST", "city": "JERSEY CITY", "regionCode": "US-NJ", "countryCode": "US", "postalCode": "07097" }], "largeTraderList": [{ "largeTraderRecordID": 1, "largeTraderID": "12345678-0000", "ltidEffectiveDate": 20150101 }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20050821 }] }, { "fdidRecordID": 2, "firmDesignatedID": "1A3016", "fdidType": "ACCOUNT", "accountType": ["FIRM", "MARKET"], "accountName": "MrktMkr", "fdidDate": 20120301, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 WATERS ST", "city": "JERSEY CITY", "regionCode": "US-NJ", "countryCode": "US", "postalCode": "07097" }], "largeTraderList": [{ "largeTraderRecordID": 1, "largeTraderID": "12345678-9999", "ltidEffectiveDate": 20150101 }] }, </pre>

File	Data
	<pre> "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20120301 }] }, { "fdidRecordID": 3, "firmDesignatedID": "1A4496", "fdidType": "ACCOUNT", "accountType": ["FIRM"], "accountName": "AnotherFirmAccount", "fdidDate": 20191201, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 WATERS ST", "city": "JERSEY CITY", "regionCode": "US-NJ", "countryCode": "US", "postalCode": "07097" }, { "addrType": "ADDRESS2", "addrLine1": "253 MAIN ST", "city": "JACKSONVILLE", "regionCode": "US-FL", "countryCode": "US", "postalCode": "32034" }], "largeTraderList": [{ "largeTraderRecordID": 1, "largeTraderID": "99999999-0001", "ltidEffectiveDate": 20191201 }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20191201 }] }, { "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "CAT Reporter Firm Name", "ein": "00-9727341", "customerType": ["BD"], </pre>

File	Data
	<pre> "lei": "L49S8SWR48C4MFGH8ZH1" }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "dc7232533673aa251694afab7091cf4e7ecb885fd80cefef91df442dba855bb" }] } </pre>

The following example is an alternative reporting approach to the same scenario above, in which the CAT Reporter Firm repeats the CAT Customer information across multiple *customerRecordID* values. The CAT Reporter Firm must ensure the data for each instance of the CAT Customer meets the [CAT Reporting Customer and Account Information Technical Specifications for Industry Members-CCID](#) requirements for consistent data across each instance. In this reporting structure, the same CAT Customer is reported with multiple *customerRecordID* values, one for each association to the FDID record. The data for the CAT Customer is repeated within the CAIS Data file as well, once for each *customerRecordID*, and the same TID value is repeated within the TIDs file for each *customerRecordID*. The below example has 3 FDIDs with three different *customerRecordID* values.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A3175", "fdidType": "ACCOUNT", "accountType": ["FIRM"], "accountName": "PropAcct1", "fdidDate": 20050821, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 WATERS ST", "city": "JERSEY CITY", "regionCode": "US-NJ", "countryCode": "US", "postalCode": "07097" }], "largeTraderList": [{ "largeTraderRecordID": 1, "largeTraderID": "10101010-1111", "ltidEffectiveDate": 20150101 }] }] } </pre>

File	Data
	<pre> }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20050821 }] }, { "fdidRecordID": 2, "firmDesignatedID": "1A0059", "fdidType": "ACCOUNT", "accountType": ["FIRM", "MARKET"], "accountName": "MrktMkr", "fdidDate": 20120301, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 WATERS ST", "city": "JERSEY CITY", "regionCode": "US-NJ", "countryCode": "US", "postalCode": "07097" }], "largeTraderList": [{ "largeTraderRecordID": 1, "largeTraderID": "90909090-0000", "ltidEffectiveDate": 20150101 }], "fdidCustomerList": [{ "customerRecordID": 35, "role": "TRDHOLDER", "roleStartDate": 20120301 }] }, { "fdidRecordID": 3, "firmDesignatedID": "1A3102", "fdidType": "ACCOUNT", "accountType": ["FIRM"], "accountName": "AnotherFirmAccount", "fdidDate": 20191201, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 WATERS ST", "city": "JERSEY CITY", "regionCode": "US-NJ", </pre>

File	Data
	<pre> "countryCode": "US", "postalCode": "07097" }, { "addrType": "ADDRESS2", "addrLine1": "253 MAIN ST", "city": "JACKSONVILLE", "regionCode": "US-FL", "countryCode": "US", "postalCode": "32034" }], "largeTraderList": [{ "largeTraderRecordID": 1, "largeTraderID": "55556666-7777", "ltidEffectiveDate": 20150101 }], "fdidCustomerList": [{ "customerRecordID": 50, "role": "TRDHOLDER", "roleStartDate": 20120301 }] }, "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "CAT Reporter Firm Name", "ein": "00-9727341", "customerType": ["BD"], "lei": "L49S8SWR48C4MFGH8ZH1" }, { "customerRecordID": 35, "legalName": "CAT Reporter Firm Name", "ein": "00-9727341", "customerType": ["BD"], "lei": "L49S8SWR48C4MFGH8ZH1" }, { "customerRecordID": 50, "legalName": "CAT Reporter Firm Name", "ein": "00-9727341", "customerType": ["BD"], "lei": "L49S8SWR48C4MFGH8ZH1" }] } </pre>
TIDs	<pre> { "tidRecordList": [{ </pre>

File	Data
	<pre> "customerRecordID": 1, "tidType": "EIN", "tidValue": "dc7232533673aa251694afab7091cf4e7ecb885fd80cefef91df442dba855bb" }, { "customerRecordID": 35, "tidType": "EIN", "tidValue": "dc7232533673aa251694afab7091cf4e7ecb885fd80cefef91df442dba855bb" }, { "customerRecordID": 50, "tidType": "EIN", "tidValue": "dc7232533673aa251694afab7091cf4e7ecb885fd80cefef91df442dba855bb" }] } </pre>

4.1.3. Firm Owned Average Price Account Used for Multiple Customers

This scenario illustrates the CAT reporting requirements when the account reported to CAIS represents a firm-owned average price account used for multiple customers, where the only CAT Customer on the account is the firm itself and the only parties authorized to trade in the account are employees of the CAT Reporter Firm. The CAT Reporter Firm is reported with a *role* of 'TRDHOLDER', as it is the beneficial holder of the account and is authorized to trade on the account, and the CAT Reporter Firm is not required to report their employees as Authorized Traders on the account.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 224, "firmDesignatedID": "1A4845", "fdidType": "ACCOUNT", "accountType": ["AVERAGE", "FIRM"], "accountName": "AVGPRICE", "fdidDate": 20210115, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "123 MAIN ST.", "city": "SAN FRANCISCO", "regionCode": "US-CA", "countryCode": "US", "postalCode": "94016" }], "fdidCustomerList": [{ </pre>

File	Data
	<pre> "customerRecordID": 23, "role": "TRDHOLDER", "roleStartDate": 20210115 }] }, "legalEntityCustomerList": [{ "customerRecordID": 23, "legalName": "Broker Dealer ABC", "ein": "00-9218388", "customerType": ["BD"], "lei": "L49S8SWR48C4MFGH8ZH1" }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 23, "tidType": "EIN", "tidValue": "cc1a0c104324aeb0159fc79195977d19794d594036d893f23a6ec23e6b4fe930" }] } </pre>

4.2. Customer Accounts

This section illustrates the CAT reporting requirements when the account reported to CAT is not owned by the CAT Reporter Firm whose data is being reported.

4.2.1. Account with Only One Holder

This scenario illustrates the CAT reporting requirements for an account on which there is a single trading customer. In this example, the account is a basic retirement account established by the holder. The CAT Customer has rights to trade in their account and is reported with a *role* of 'TRDHOLDER'.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 2000, "firmDesignatedID": "1A25978", "fdidType": "ACCOUNT", "accountType": ["RETIREMENT", "BROKERAGE"], "accountName": "Joseph's Retirement Account", "fdidDate": 20210115, "addressList": [{ </pre>

File	Data
	<pre> "addrType": "ADDRESS1", "addrLine1": "415 MAIN BOULEVARD", "city": "CHICAGO", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60176" }], "fdidCustomerList": [{ "customerRecordID": 40, "role": "TRDHOLDER", "roleStartDate": 20210115 }] }, "naturalPersonCustomerList": [{ "customerRecordID": 40, "firstName": "JOSEPH", "middleName": "WALTER", "lastName": "SMYTHE", "nameSuffix": "SENIOR", "yearOfBirth": 1981, "customerType": ["NOTAPPLICABLE"], "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "23 MAIN AVE", "city": "PALATINE", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60038" }] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 40, "tidType": "SSN/ITIN", "tidValue": "7d428d1e6f7ddf14973c2c0df79ccc87912322c68ca500f29b27cf5bee487ed5" }] } </pre>

4.2.2. Account Holder and Authorized Trader Who is an Employee

This scenario illustrates the CAT reporting requirements when the account reported to CAIS has both a holder and an authorized trader on the account, where the authorized trader is an employee of the firm and has discretion to trade on the account on behalf of the account holder. Additionally, the employee is dually registered as a Registered Investment Adviser. Both the beneficial holder and the Authorized Trader are reported in association to the FDID record. The employee authorized trader is not required to be included in the submission because they are an employee of the reporting firm. Refer to [FAQ Q56](#) for additional information.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 5000, "firmDesignatedID": "1A25978", "fdidType": "ACCOUNT", "accountType": ["ADVISED", "RETIREMENT", "BROKERAGE"], "accountName": "Advised Retirement Acct", "registeredRepCRD": ["99999"], "branchOfficeCRD": 77777, "fdidDate": 20210115, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "415 MAIN BOULEVARD", "city": "CHICAGO", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60176" }], "fdidCustomerList": [{ "customerRecordID": 72, "role": "TRDHOLDER", "roleStartDate": 20210115 }, { "customerRecordID": 589, "role": "AUTH3RD", "hasDiscretion": true, "roleStartDate": 20210115 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 72, "firstName": "JOSEPH", "middleName": "WALTER", "lastName": "SMYTHE", </pre>

File	Data
	<pre> "nameSuffix": "THIRD", "yearOfBirth": 1975, "customerType": ["NOTAPPLICABLE"] }], "legalEntityCustomerList": [{ "customerRecordID": 589 "legalName": "CAT Reporter Firm Inc.", "ein": "00-7478488", "customerType": ["BD", "ADVISER"], "lei": "037RCP01MV6749XWQ3Z6" }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 72, "tidType": "SSN/ITIN", "tidValue": "47471430482258447580bb291a2ba29c79483f09000f25fccccfdc3bead7f46e0" }, { "customerRecordID": 415, "tidType": "SSN/ITIN", "tidValue": "06ecc97f329281e67b8c321bbe6f8630b346ee8e80356a34196352abd49ef67c" }, { "customerRecordID": 589, "tidType": "EIN", "tidValue": "c30ef117db387710cdd88ebca6887a7d2356ee40e0df29e04cc3ba6ae2facf92" }] } </pre>

4.2.3. Relationship ID Based FDID

This scenario illustrates the CAT reporting requirements when the FDID reported to CAIS is based on a relationship and the CAT Reporter Firm does not have a list of traders authorized to place orders. In this scenario, the CAT Reporter Firm may not have a name for the relationship, and the firm opts to use the *firmDesignatedID* value as the *accountName*. The CAT Reporter Firm only knows the fund manager as their CAT Customer, and therefore has no additional account holders or Authorized Traders for reporting to CAT.

File	Data
Data	<pre> { "fdidRecordList": [</pre>

File	Data
	<pre> { "fdidRecordID": 224, "firmDesignatedID": "1A4949", "fdidType": "RELATIONSHIP", "accountType": ["RELATIONSHIP"], "accountName": "IA4949", "branchOfficeCRD": "900221", "fdidDate": 20210115, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "123 MAIN ST.", "addrLine2": "Suite 102, Big Fund Manager", "city": "SAN FRANCISCO", "regionCode": "US-CA", "countryCode": "US", "postalCode": "94016" }], "largeTraderList": [{ "largeTraderRecordID": 1, "largeTraderID": "12312312-3123", "ltidEffectiveDate": 20150101 }], "fdidCustomerList": [{ "customerRecordID": 55, "role": "TRDHOLDER", "roleStartDate": 20210115 }], "legalEntityCustomerList": [{ "customerRecordID": 55, "legalName": "Big Fund Manager", "ein": "00-8838114", "customerType": ["ADVISER"], "lei": "L49S8SWR48C4MFGH8ZH1" }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 55, "tidType": "EIN", "tidValue": "ef8e60f1ccdc6cb54f218ef62043dc3b2f1e0b89b2c62343d3119f9b6538b6ce" }] } </pre>

4.2.4. DVP/RVP Account with a Clearing Number

This scenario illustrates the CAT reporting requirements from the perspective of a non-clearing executing broker when the account reported to CAIS is a DVP/RVP account, where the shares are being delivered from the executing broker to the prime broker. As the *accountType* includes 'DVP/RVP', the *primeBrokerID* attribute must be populated.. In this example, there is one prime broker for the account, and the account is held in the name of the prime broker. The institutional client is an authorized trader on the account. Refer to [FAQ Q39](#) for additional details.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 123, "firmDesignatedID": "1A1938", "fdidType": "ACCOUNT", "accountType": ["DVP/RVP", "BROKERAGE"], "accountName": "PB DVP RVP ACCT. FBO INSTIT. CLIENT", "branchOfficeCRD": 123456, "primeBrokerID": ["9542"], "fdidDate": 20210115, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 WATERS ST", "city": "JERSEY CITY", "regionCode": "US-NJ", "countryCode": "US", "postalCode": "07097" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20210115 }, { "customerRecordID": 55, "role": "AUTH3RD", "hasDiscretion": true, "roleStartDate": 20210115 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "Prime Broker", "ein": "00-8803921", "customerType": ["BD"], "lei": "WQ930027TVN471GRQ09" }] }</pre>

File	Data
	<pre> }, { "customerRecordID": 55, "legalName": "Institutional Customer", "ein": "00-1762321", "customerType": ["NOTAPPLICABLE"], "lei": "L49S8SWR48C4MFGH8ZH1" }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "e08c15f826ee2a9baacf4d390d495e77a21babd1ab964cc6f8271e9925267c61" }, { "customerRecordID": 55, "tidType": "EIN", "tidValue": "d2afa960e7fb1bdd523a225f994bb8c1f9b31f4ac17f6271cdf9b3b016e7a6b6" }] } </pre>

4.2.5. DVP/RVP Account with Bank Depository ID

This scenario illustrates the CAT reporting requirements from the perspective of a non-clearing executing broker when the account reported to CAIS is a DVP/RVP account, where the shares are being delivered from the executing broker to a bank, which is the custodian of the account. As the *accountType* includes 'DVP/RVP', the *bankDepositoryID* attribute must be populated. In this example, where shares are being delivered to a non-broker dealer bank, there is only a single depository value included within the array. If multiple values exist for the account, each of them must be included within the array in a comma-delimited list. This account is held in the name of the institutional client that is also an authorized trader on the account.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 123, "firmDesignatedID": "1A0491", "fdidType": "ACCOUNT", "accountType": ["DVP/RVP", "BROKERAGE"], "accountName": "BankDVPCustody", "branchOfficeCRD": 654321, "bankDepositoryID": [3209], "clearingBrokerID": [1022], </pre>

File	Data
	<pre> "fdidDate": 20210115, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "1 WATERS ST", "city": "JERSEY CITY", "regionCode": "US-NJ", "countryCode": "US", "postalCode": "07097" }], "fdidCustomerList": [{ "customerRecordID": 55, "role": "TRDHOLDER", "roleStartDate": 20210115 }]], "legalEntityCustomerList": [{ "customerRecordID": 55, "legalName": "Big Hedge Fund", "ein": "00-3187272", "customerType": ["NOTAPPLICABLE"], "lei": "L49S8SWR48C4MFGH8ZH1" }]] </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 55, "tidType": "EIN", "tidValue": "fbbf9e01933589e830d93613149976c587a6ceddbd10a28614cb1f4b83e1b84e" }] } </pre>

4.2.6. UGMA/UTMA Custodied Account

This scenario illustrates the CAT reporting requirements for a UGMA/UTMA custody account with two holders – one holder who is the custodian as either an account holder or authorized trader with authorization to trade, and another holder who is a minor and does not have authorization to trade. This scenario illustrates two options for the account structure, and two options for reporting when the minor reaches the age of majority.

Account Structure - Option 1

In this example, the CAT Reporter establishes the account with the custodian as an account holder with authorization to trade on the account, and the minor as a holder of the account that does not have authorization to trade.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 2000, "firmDesignatedID": "1A25978", "fdidType": "ACCOUNT", "accountType": ["UGMA/UTMA", "BROKERAGE"], "accountName": "Custodied Account", "fdidDate": 20210115, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "415 MAIN BOULEVARD", "city": "CHICAGO", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60176" }] }, { "fdidCustomerList": [{ "customerRecordID": 40, "role": "TRDHOLDER", "roleStartDate": 20210115 }, { "customerRecordID": 10, "role": "NTHOLDER", "roleStartDate": 20210115 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 40, "firstName": "JOSEPH", "middleName": "WALTER", "lastName": "SMYTHE", "nameSuffix": "SENIOR", "yearOfBirth": 1981, "customerType": ["NOTAPPLICABLE"], "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "23 MAIN AVE", "city": "PALATINE", "regionCode": "US-IL", </pre>

File	Data
	<pre> "countryCode": "US", "postalCode": "60038" }] }, { "customerRecordID": 10, "firstName": "JOSEPH", "middleName": "WALTER", "lastName": "SMYTHE", "nameSuffix": "JUNIOR", "yearOfBirth": 2011, "customerType": ["NOTAPPLICABLE"], "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "23 MAIN AVE", "city": "PALATINE", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60038" }] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 40, "tidType": "SSN/ITIN", "tidValue": "a82f70c87b9c3371825ed68ee61c35cf856a9cce50a71676be3533963e5f8719" }, { "customerRecordID": 10, "tidType": "SSN/ITIN", "tidValue": "18d55bf55668ecd5922288be01548d3f0bd9fa338db1dc43165ac3d560c43c44" }] } </pre>

Account Structure – Option 2

In this example, the custodian is an authorized trader on the account, and the minor is a holder of the account that does not have authorization to trade.

File	Data
Data	<pre> { "fdidRecordList": [{ </pre>

File	Data
	<pre> "fdidRecordID": 2000, "firmDesignatedID": "1A25978", "fdidType": "ACCOUNT", "accountType": ["UGMA/UTMA", "BROKERAGE"], "accountName": "Custodied Account", "fdidDate": 20210115, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "415 MAIN BOULEVARD", "city": "CHICAGO", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60176" }], "fdidCustomerList": [{ "customerRecordID": 40, "role": "AUTH3RD", "hasDiscretion": true, "roleStartDate": 20210115 }, { "customerRecordID": 10, "role": "NTHOLDER", "roleStartDate": 20210115 }] }, "naturalPersonCustomerList": [{ "customerRecordID": 40, "firstName": "JOSEPH", "middleName": "WALTER", "lastName": "SMYTHE", "nameSuffix": "SENIOR", "yearOfBirth": 1981, "customerType": ["NOTAPPLICABLE"], "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "23 MAIN AVE", "city": "PALATINE", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60038" }] }, { "customerRecordID": 10, "firstName": "JOSEPH", "middleName": "WALTER", </pre>

File	Data
	<pre> "lastName": "SMYTHE", "nameSuffix": "JUNIOR", "yearOfBirth": 2011, "customerType": ["NOTAPPLICABLE"], "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "23 MAIN AVE", "city": "PALATINE", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60038" }] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 40, "tidType": "SSN/ITIN", "tidValue": "a82f70c87b9c3371825ed68ee61c35cf856a9cce50a71676be3533963e5f8719" }, { "customerRecordID": 10, "tidType": "SSN/ITIN", "tidValue": "18d55bf55668ecd5922288be01548d3f0bd9fa338db1dc43165ac3d560c43c44" }] } </pre>

Age of Majority - Option 1

When a minor associated to an UGMA/UTMA account reaches the age of majority, the CAT Reporter firm's policy is to close the UGMA/UTMA account and transfer the assets to a new brokerage account. In this example, the minor has reached the age of majority and contacted the CAT Reporter firm. In Option 1, the former minor is the account holder that also has authorization to trade on the new account and the former custodian is not a CAT Customer on the new account. The CAT Reporter firm ends the previous FDID. The firm opens a new FDID on which there is only one CAT Customer.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A25978", "fdidType": "ACCOUNT", </pre>

File	Data
	<pre> "accountType": ["UGMA/UTMA", "BROKERAGE"], "accountName": "Custodied Account", "fdidDate": 20210115, "fdidEndDate": 20220815, "fdidEndReason": "ENDED", "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "415 MAIN BOULEVARD", "city": "CHICAGO", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60176" }] }, { "fdidRecordID": 2, "firmDesignatedID": "IA94913", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "New Account", "fdidDate": 20220815, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "415 MAIN BOULEVARD", "city": "CHICAGO", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60176" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20220815 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "JOSEPH", "middleName": "WALTER", "lastName": "SMYTHE", "nameSuffix": "JUNIOR", "yearOfBirth": 2011, "customerType": ["NOTAPPLICABLE"], "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "23 MAIN AVE", </pre>

File	Data
	<pre> "city": "PALATINE", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60038" }] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "18d55bf55668ecd5922288be01548d3f0bd9fa338db1dc43165ac3d560c43c44" }] } </pre>

Age of Majority – Option 2

When a minor associated to an UGMA/UTMA account reaches the age of majority, the CAT Reporter firm’s policy is to close the UGMA/UTMA account and transfer the assets to a new brokerage account. In this example, the minor has reached the age of majority and contacted the CAT Reporter firm. In Option 2, the former minor is the account holder that also has authorization to trade on the new account and the former custodian is an authorized trader on the new account. The CAT Reporter firm ends the previous FDID. The firm opens a new FDID on which there are two CAT Customers – the holder, previously a minor, as a trading holder, and the former custodian as an authorized trader.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A25978", "fdidType": "ACCOUNT", "accountType": ["UGMA/UTMA", "BROKERAGE"], "accountName": "Custodied Account", "fdidDate": 20210115, "fdidEndDate": 20220815, "fdidEndReason": "ENDED", "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "415 MAIN BOULEVARD", "city": "CHICAGO", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60176" }] }] } </pre>

File	Data
	<pre> }] }, { "fdidRecordID": 2, "firmDesignatedID": "IA94913", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "New Account", "fdidDate": 20220815, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "415 MAIN BOULEVARD", "city": "CHICAGO", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60176" }], "fdidCustomerList": [{ "customerRecordID": 10, "role": "TRDHOLDER", "roleStartDate": 20220815 }, { "customerRecordID": 40, "role": "AUTH3RD", "hasDiscretion": true, "roleStartDate": 20220815 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 40, "firstName": "JOSEPH", "middleName": "WALTER", "lastName": "SMYTHE", "nameSuffix": "SENIOR", "yearOfBirth": 1981, "customerType": ["NOTAPPLICABLE"], "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "23 MAIN AVE", "city": "PALATINE", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60038" }] }] }, </pre>

File	Data
	<pre> { "customerRecordID": 10, "firstName": "JOSEPH", "middleName": "WALTER", "lastName": "SMYTHE", "nameSuffix": "JUNIOR", "yearOfBirth": 2011, "customerType": ["NOTAPPLICABLE"], "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "23 MAIN AVE", "city": "PALATINE", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60038" }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 40, "tidType": "SSN/ITIN", "tidValue": "18d55bf55668ecd5922288be01548d3f0bd9fa338db1dc43165ac3d560c43c44" }, { "customerRecordID": 10, "tidType": "SSN/ITIN", "tidValue": "57af67a635570b66ec7385cb6e9bd2c8b4ee311063f189c6a1bfb7c313e700b8" }] } </pre>

4.2.7. Adding Holders or Authorized Traders to an Account

This scenario illustrates the CAT reporting requirements for adding an account holder or authorized trader to an FDID. Depending on the CAT Reporter firm’s business practices, the firm can either add additional holders or authorized traders to the same account, or the firm can close the individual account and open a new joint account.

Option 1 – Adding a New CAT Customer to the Same Account

In Option 1, the FDID record had previously been accepted by CAT CAIS with a single Customer Record. In the record illustrated below, the CAT Reporter submits an FDID record with all the same information

that was previously accepted by CAT CAIS, but includes a second Customer record. In addition, the TIDs file now includes the TID information for the newly added Customer.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A7759", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "CustAcct456", "fdidDate": 20190615, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "150 SW ORANGE ST", "city": "BROOKLYN", "regionCode": "US-NY", "countryCode": "US", "postalCode": "11201" }], }, { "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20190615 }, { "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20220815 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "John", "lastName": "Doe", "yearOfBirth": 1982, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 2, "firstName": "Jane", "lastName": "Doe", "yearOfBirth": 1989, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { </pre>

File	Data
	<pre> "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "56c4d1ee2fa66991602dc80580116d195ca362d7a0b5647fea17f3e104c97944" }, { "customerRecordID": 2, "tidType": "SSN/ITIN", "tidValue": "76d983df81f129e1d917709aead1cfe9f7be02057d053d2187b12961b55d0f8c" }] </pre>

Option 2 – Ending an Individual Account and Opening a New Joint Account

In Option 2, the CAT Reporter has closed the individual account and opened a new account with two account holders.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A7759", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "CustAcct456", "fdidDate": 20190615, "fdidEndDate": 20220815, "fdidEndReason": "ENDED", "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "150 SW ORANGE ST", "city": "BROOKLYN", "regionCode": "US-NY", "countryCode": "US", "postalCode": "11201" }], }, { "fdidRecordID": 2, "firmDesignatedID": "1A7760", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "CustAcct456", "fdidDate": 20220815, "addressList": [{ "addrType": "ADDRESS1", </pre>

File	Data
	<pre> "addrLine1": "150 SW ORANGE ST", "city": "BROOKLYN", "regionCode": "US-NY", "countryCode": "US", "postalCode": "11201" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20190615 }, { "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20220815 }] }, "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "John", "lastName": "Doe", "yearOfBirth": 1982, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 2, "firstName": "Jane", "lastName": "Doe", "yearOfBirth": 1989, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "56c4d1ee2fa66991602dc80580116d195ca362d7a0b5647fea17f3e104c97944" }, { "customerRecordID": 2, "tidType": "SSN/ITIN", "tidValue": "76d983df81f129e1d917709aead1cfe9f7be02057d053d2187b12961b55d0f8c" }] } </pre>

5. Customer Data Inconsistency Scenarios

Resolving a Material Inconsistency requires that a CAT Reporter follow the Material Inconsistencies Procedure as set forth in the [CAT Reporting Customer and Account Technical Specifications for Industry Members-CCID](#) to confirm or correct the record that generated the Material Inconsistency. The Material Inconsistencies Procedure does not require the CAT Reporter to contact the Customer to confirm the Customer's information. See [FAQ Q55](#) for more information. For more information on Material Inconsistencies, see the Notification of Customer Record Updates section of the the [CAT Reporting Customer and Account Technical Specifications for Industry Members-CCID](#).

5.1. Material Update to Previously Submitted Customer Data

This scenario illustrates the CAT reporting requirements when updating a material attribute such as Year of Birth or EIN. When updating a material attribute, the CAT Reporter must populate the *updateNotification* field with 'true'. If the *updateNotification* is omitted or set to 'false', a material inconsistency will be created that must be resolved.

In this scenario, the CAT Reporter must update the Year of Birth for the Customer on the FDID record. The *updateNotification* field is populated with 'true' to indicate that the customer record is being reported with known updates to a material attribute. If populated as 'true', changes to the material attributes will not result in a Material Inconsistency.

Original Submission

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A0045", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "Customer Acct", "fdidDate": 20150628, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "150 SW ORANGE ST", "city": "BROOKLYN", "regionCode": "US-NY", "countryCode": "US", "postalCode": "11201" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20150628 }] }] }</pre>

File	Data
	<pre> }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "Sally", "lastName": "Miller", "yearOfBirth": 1965, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "43f09db91020752d4249b9e4c00d70dad54af27a254128aa78e5ab5f5f30ea26" }] } </pre>

Updating Submission

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A0045", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "Customer Acct", "fdidDate": 20150628, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "150 SW ORANGE ST", "city": "BROOKLYN", "regionCode": "US-NY", "countryCode": "US", "postalCode": "11201" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20150628 }] }] } </pre>

File	Data
	<pre>] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "Sally", "lastName": "Miller", "yearOfBirth": 1975, "customerType": ["NOTAPPLICABLE"], "updateNotification": true }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "43f09db91020752d4249b9e4c00d70dad54af27a254128aa78e5ab5f5f30ea26" }] } </pre>

5.2. Resolving an Intra-Firm Material Inconsistency

This scenario illustrates the CAT reporting requirements for resolving a material inconsistency which a CAT Reporter has triggered against their own data. In this example, the CAT Reporter submits an FDID with one associated customer to CAIS. In a subsequent submission, the same CAT Reporter submits the same customer with a different *yearOfBirth* than previously submitted. In the resolving submission, the CAT Reporter must include the *updateNotification* attribute set to 'true' in order to resolve the inconsistency.

Original Submission

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A1422", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "CustAcct1", "fdidDate": 20090312, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "150 SW ORANGE ST", </pre>

File	Data
	<pre> "city": "BROOKLYN", "regionCode": "US-NY", "countryCode": "US", "postalCode": "11201" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20090312 }, { "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20090415 }] }, "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "John", "lastName": "Doe", "yearOfBirth": 1982, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 2, "firstName": "Marie", "lastName": "Doe", "yearOfBirth": 1979, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "52f544a8c2c594d8852b84a33ac8fe9f861579d2e7dd2c31584e9098925c4065" }] } </pre>

Second Submission (Triggered an Intra-Firm Material Inconsistency)

In this submission, the CAT Reporter erroneously changes the customer's *yearOfBirth*. A material inconsistency is created from this submission because the Year of Birth differs materially from the same attribute previously reported by the CAT Reporter for the same customer.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A1422", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "CustAcct1", "fdidDate": 20090312, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "150 SW ORANGE ST", "city": "BROOKLYN", "regionCode": "US-NY", "countryCode": "US", "postalCode": "11201" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20090312 }, { "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20090415 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "John", "lastName": "Doe", "yearOfBirth": 1928, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 2, "firstName": "Marie", "lastName": "Doe", "yearOfBirth": 1979, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", </pre>

File	Data
	<pre> "tidValue": "52f544a8c2c594d8852b84a33ac8fe9f861579d2e7dd2c31584e9098925c4065" }, { "customerRecordID": 2, "tidType": "SSN/ITIN", "tidValue": "6935ff6de288fc7db127c50fca29af514b5df2ed67ebcd935490a7b74f8f76e3" }] } </pre>

Resolution of Material Inconsistency

In this submission, the CAT Reporter reverts the erroneous *yearOfBirth* value back to its correct value of '1982'. The CAT Reporter must include an *updateNotification* attribute set to 'true' for this customer in order to resolve the material inconsistency.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A1422", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "CustAcct1", "fdidDate": 20090312, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "150 SW ORANGE ST", "city": "BROOKLYN", "regionCode": "US-NY", "countryCode": "US", "postalCode": "11201" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20090312 }, { "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20090415 }] }], } </pre>

File	Data
	<pre> "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "John", "lastName": "Doe", "yearOfBirth": 1982, "customerType": ["NOTAPPLICABLE"], "updateNotification": true }, { "customerRecordID": 1, "firstName": "Marie", "lastName": "Doe", "yearOfBirth": 1979, "customerType": ["NOTAPPLICABLE"] }] </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "52f544a8c2c594d8852b84a33ac8fe9f861579d2e7dd2c31584e9098925c4065" }, { "customerRecordID": 2, "tidType": "SSN/ITIN", "tidValue": "6935ff6de288fc7db127c50fca29af514b5df2ed67ebcd935490a7b74f8f76e3" }] } </pre>

5.3. Resolving an Inter-Firm Material Inconsistency

This scenario illustrates the CAT reporting requirements for both the Triggering Firm and Impacted Firm in the event of an inter-firm material inconsistency. The CAT Reporter whose submission data is materially inconsistent compared to the data currently stored in CAIS (whether the currently stored data was entered by the same CAT Reporter or another CAT Reporter) is referred to as the “Triggering Firm”. The CAT Reporter whose data was previously stored in CAIS, whose data is now determined to be inconsistent as a result of the submission of the same customer by **another** CAT Reporter, is referred to as the “Impacted Firm”.

Original Submission by Impacted Firm

In this submission, the Impacted Firm is the first CAT Reporter to have submitted this customer. The Reporter includes a *yearOfBirth* of ‘1979’ for this customer.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "ABC89592", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "BKRACCT123", "fdidDate": 20050219, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "150 SW ORANGE ST", "city": "BROOKLYN", "regionCode": "US-NY", "countryCode": "US", "postalCode": "11201" }] }, "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20050219 }, { "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20050219 }]], "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "Marie", "lastName": "Doe", "yearOfBirth": 1979, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 2, "firstName": "Bob", "lastName": "Doe", "yearOfBirth": 1975, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", </pre>

File	Data
	<pre> "tidValue": "2db58cda470d70297055ba46060e2cab894e89bda6bfb6eb6a83b6026ef5c0341" }, { "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "facfa84f17d230eba97d9fbb80fd204eda2f3550f792f1bf00f841e522960813" }] } </pre>

Submission by Triggering Firm which Triggers a Material Inconsistency

In this submission, a second CAT Reporter (the Triggering Firm) submits the same CAT Customer with materially different data than previously reported for the same customer by the other CAT Reporter (the Impacted Firm). The Triggering Firm includes a *yearOfBirth* of '1997', which differs from the previously reported value of '1979' by the Impacted Firm. This creates a material inconsistency which the Triggering Firm must address.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "ACCT02934", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE", "OPTION"], "accountName": " ACCT02934", "fdidDate": 20111201, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "150 SW ORANGE ST", "city": "BROOKLYN", "regionCode": "US-NY", "countryCode": "US", "postalCode": "11201" }] }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20111201 }, { "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20111201 }] } </pre>

File	Data
	<pre>] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "Marie", "middleName": "F", "lastName": "Doe", "yearOfBirth": 1997, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 2, "firstName": "Bob", "lastName": "Smith", "yearOfBirth": 1975, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "2db58cda470d70297055ba46060e2cab894e89bda6bfbbeb6a83b6026ef5c0341" }, { "customerRecordID": 2, "tidType": "SSN/ITIN", "tidValue": "facfa84f17d230eba97d9fbb80fd204eda2f3550f792f1bf00f841e522960813" }] } </pre>

Triggering Firm Inconsistency Resolution

The Triggering Firm is notified that the material inconsistency has been created via the Nightly Inconsistencies Feedback File. The Triggering Firm submits the following data to CAIS in order to resolve the material inconsistency for their firm.

In this scenario, the Triggering Firm is reconfirming the *yearOfBirth* of '1997', which still differs from the previously reported value of '1979' by the Impacted Firm. The Triggering Firm must include the *updateNotification* field populated with 'true'.

File	Data
Data	<pre> { "fdidRecordList": [</pre>

File	Data
	<pre> { "fdidRecordID": 1, "firmDesignatedID": "ACCT02934", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE", "OPTION"], "accountName": " ACCT02934", "fdidDate": 20111201, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "150 SW ORANGE ST", "city": "BROOKLYN", "regionCode": "US-NY", "countryCode": "US", "postalCode": "11201" }], "fdidCustomerList": [{ "customerRecordID": 5, "role": "TRDHOLDER", "roleStartDate": 20111201 }, { "customerRecordID": 6, "role": "TRDHOLDER", "roleStartDate": 20111201 }] }, "naturalPersonCustomerList": [{ "customerRecordID": 5, "firstName": "Marie", "middleName": "F", "lastName": "Doe", "yearOfBirth": 1997, "customerType": ["NOTAPPLICABLE"], "updateNotification": true }, { "customerRecordID": 6, "firstName": "Bob", "lastName": "Doe", "yearOfBirth": 1975, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 5, "tidType": "SSN/ITIN", </pre>

File	Data
	<pre> "tidValue": "2db58cda470d70297055ba46060e2cab894e89bda6bfb6b6a83b6026ef5c0341" }, { "customerRecordID": 6, "tidType": "SSN/ITIN", "tidValue": "facfa84f17d230eba97d9fbb80fd204eda2f3550f792f1bf00f841e522960813" }] } </pre>

Impacted Firm Inconsistency Resolution

Once the Triggering Firm has resolved their material inconsistency, the Impacted Firm is notified of the inconsistency with their data via the Nightly Inconsistencies Feedback File. The Impacted Firm takes note of the material inconsistency within this file, then submits the following data to CAIS in order to resolve the material inconsistency on behalf of their firm. See Section 2.2.12 – Material Inconsistencies Procedure in the [CAT Reporting Customer and Account Technical Specifications for Industry Members-CCID](#) for details on inconsistency notification and resolution.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "ABC89592", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "BKRACCT123", "fdidDate": 20050219, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "150 SW ORANGE ST", "city": "BROOKLYN", "regionCode": "US-NY", "countryCode": "US", "postalCode": "11201" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20050219 }] }], } </pre>

File	Data
	<pre>"naturalPersonCustomerList": [{ "customerRecordID": 1, "firstName": "Marie", "lastName": "Doe", "yearOfBirth": 1997, "customerType": ["NOTAPPLICABLE"], "updateNotification": true }]</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "2db58cda470d70297055ba46060e2cab894e89bda6bfbbeb6a83b6026ef5c0341" }] }</pre>

5.4. Changing an EIN

5.4.1. Reporting Change in EIN

This scenario illustrates the CAT reporting requirements for reporting a change in a CAT Customer's EIN. Due to a merger, the Legal Entity CAT Customer's EIN value has changed, therefore the originally reported TID value must be replaced. Since the Input Identifier used to generate the customer's TID was an EIN, the CAT Reporter must report this customer with a new TID generated from the new EIN, in addition to reporting the new, plain text EIN within the CAIS Data file.

Original Submission

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA0019", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "Bkr Acct 19", "fdidDate": 20190502, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "5 MAPLE AVE", "city": "AUSTIN", "regionCode": "US-TX", </pre>

File	Data
	<pre> "countryCode": "US", "postalCode": "73301" }], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20190502 }] }, "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "ABC Corporation", "ein": "00-3583529", "customerType": ["NOTAPPLICABLE"], }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "fffb84a69fcb89a4a5d07584a0d1bec5ee6ec4e258d5a1410d37277ec1130b785" }] } </pre>

Resubmission

In this example, the CAT Reporter is updating the customer's EIN value to '00-4577325'. The CAT Reporter enters this value in the plaintext *ein* field. Additionally, the CAT Reporter ends the previously reported TID by supplying *replacedByTID* and *replacedByTIDType* values which point to the customer's new TID. The CAT Reporter can either manually end the customer's previous *role* on the FDID by setting a *roleEndDate* and *roleEndReason*, or the CAT Reporter can simply omit the previous *role* from the submission, which will implicitly end the *role*. At least one active *role* must still be included on the FDID record.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA0019", "fdidType": "ACCOUNT", </pre>

File	Data
	<pre> "accountType": ["BROKERAGE"], "accountName": "Bkr Acct 19", "fdidDate": 20190502, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "5 MAPLE AVE", "city": "AUSTIN", "regionCode": "US-TX", "countryCode": "US", "postalCode": "73301" }], "fdidCustomerList": [{ "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20190502 }]], "legalEntityCustomerList": [{ "customerRecordID": 1, "legalName": "ABC Corporation", "ein": "00-3583529", "customerType": ["NOTAPPLICABLE"], }, { "customerRecordID": 2, "legalName": "ABC Corporation", "ein": "00-4577325", "customerType": ["NOTAPPLICABLE"], }]] </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "fffb84a69fcb89a4a5d07584a0d1bec5ee6ec4e258d5a1410d37277ec1130b785", "replacedByTIDType": "EIN", "replacedByTID": "fffb84a69fcb89a4a5d07584a0d1bec5ee6ec4e258d5a1410d37277ec1130b785" }, { "customerRecordID": 2, "tidType": "EIN", "tidValue": "4c8f21e1d71b0d1520858ea4903a2212d82f8f3d2cf8f1beccc059388e3d3087" }] } </pre>

File	Data
	}

5.5. Resolving a Customer Record Type Inconsistency

This scenario illustrates the CAT reporting requirements when a CAT Reporter firm reports the same foreign CAT customer twice, with differing Customer Record Types (Natural Person or Legal Entity). In the original submission, the firm encounters an inconsistency because it has reported the same foreign CAT Customer within the *naturalPersonCustomerList* and the *legalEntityCustomerList*. The inconsistency is subsequently resolved by submitting the correct Customer Record Type in addition to the *updateNotification* set to 'true'.

Original Submission

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": " IA0613", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "Acct 789", "fdidDate": 20070513, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "5 MAPLE AVE", "city": "AUSTIN", "regionCode": "US-TX", "countryCode": "US", "postalCode": "73301" }] }, { "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20070513 }, { "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20070513 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, </pre>

File	Data
	<pre> "legalName": "JANE DOE LIVING TRUST", "customerType": ["TRUST"] }], "naturalPersonCustomerList": [{ "customerRecordID": 2, "firstName": "JANE", "lastName": "DOE", "doingBusinessAs": "JANE DOE LIVING TRUST", "yearOfBirth": 1979, "customerType": ["TRUST"] }] </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "FOREIGN", "foreignTIDType": "NATIONALID", "foreignTIDCountryCd": "CA", "tidValue": "e6b5aa46b28a5dd7c39a53e2f755d5964228cb656bb436ab7d9cb9afd57961d3" }, { "customerRecordID": 2, "tidType": "FOREIGN", "foreignTIDType": "NATIONALID", "foreignTIDCountryCd": "CA", "tidValue": "e6b5aa46b28a5dd7c39a53e2f755d5964228cb656bb436ab7d9cb9afd57961d3" }] } </pre>

Correcting Submission

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": " IA0613", "fdidType": "ACCOUNT", "accountType": ["BROKERAGE"], "accountName": "Acct 789", "fdidDate": 20070513, "addressList": [{ "addrType": "ADDRESS1", "addrLine1": "5 MAPLE AVE", "city": "AUSTIN", "regionCode": "US-TX", </pre>

File	Data
	<pre> "countryCode": "US", "postalCode": "73301" }], "fdidCustomerList": [{ "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20070513 }] }, "naturalPersonCustomerList": [{ "customerRecordID": 2, "firstName": "JANE", "lastName": "DOE", "doingBusinessAs": "JANE DOE LIVING TRUST", "yearOfBirth": 1979, "customerType": ["TRUST"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 2, "tidType": "FOREIGN", "foreignTIDType": "NATIONALID", "foreignTIDCountryCd": "CA", "tidValue": "e6b5aa46b28a5dd7c39a53e2f755d5964228cb656bb436ab7d9cb9afd57961d3" }] } </pre>