**Consolidated Audit Trail** Customer and Account Information System (CAIS) CAIS Technical Specification Updates – r7

3/15/2022

## Notable Updates

v2.0 r7 of the Full CAIS Industry Member Technical Specifications (Clean and Redlined) were published on March 9, 2022.

- Addition of the DVPCustodianID field and removal of the primeBrokerID and bankDepositoryID fields.
- Addition of 'INACTIVE' fdidEndReason value
  - Indicates the FDID has had no CAT reportable transaction activity associated with the FDID in the prior six months.
  - Results in addition of 'INACTIVE' value *ltidEndReason* and *roleEndReason* for cascading purposes when associations are not explicitly ended in the submission file.
- Removal of 'CP' and 'OTHBKR' as acceptable *customerType* values for Legal Entities.
- Removal of 'BROKERAGE' and 'ADVISED' as acceptable accountType values.
- Updated definition of 'OTHER' accountType value: "Account which does not meet the criteria for any other listed value."

## Notable Updates

- Updated definition of 'ADVISER' customerType value for Legal Entities: "Customer was identified as a US registered Investment Adviser, if the fact that the Customer is a US registered Investment Adviser is maintained as an attribute in the Industry Member's general customer and account records."
- Addition of new Table 3 detailing the Inconsistency Repair Deadline for Material Inconsistencies with examples.
- Added Section 6.6 describing FDID Version Report.
- Detailed a Material Inconsistency grace period in Sections 2.2.13 & 2.2.14 Material Inconsistency Obligations.
- Clarified LTID remains associated to FDID in Full CAIS Phase (Section 2.2.2).
- Added reference to FAQ Q57 in Section 2.2.6 Transformed Identifier (TID).
- Clarified acceptable use of 'NNVE' value in Section 5.1.3.2 Reference Data File Submission Customer.
  - For use when a Customer legally has one name.

### Notable Updates

- Clarified definition of *clearingBrokerID*, *statusHistory*, and *submissionStatus* attributes.
- > Updated data type of *submissionID* in Identifiers Feedback file.
- Replaced rejectionID attribute with warningID in Identifiers Feedback file.
- Corrected references of tidRecordID to customerRecordID.
- Corrected references of correctionsList to correctionList.
- Changes to Error Codes:
  - Added 22075 (Missing or Invalid DVPCustodianID)
  - Removed 22051 Neither primeBrokerID nor bankDepositoryID populated
  - Removed 22062 Invalid primeBrokerID
  - Removed 22063 Invalid bankDepositoryID
  - Clarified definitions of error codes 22529 (Customer record rejected because another version of the customer was rejected), 22526 (*customerRecordID* not present in paired Identifiers file), and 22042 (Customer record rejected because there are multiple active roles for customer within *fdidCustomerList*).

# DVPCustodianID

- A new **DVPCustodianID** field was added to the CAIS Technical Specification, in place of the primeBrokerID and bankDepositoryID attributes that were removed.
  - > Alphanumeric array which allows for multiple 5-character values.
  - Definition: "If the custodian is a US broker dealer, this field must represent the clearing number of the custodian. If the custodian is a US bank and is not a registered brokerdealer, this field must represent the DTC number of the bank. If the custodian is a foreign entity, this attribute must be populated with a value of 'FOR'. Required when accountType includes 'DVP/RVP'."
- ➢ Field changes will be available in the Test environment on April 11<sup>th</sup>, 2022.

### FINRA CAT Helpdesk

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# Q&A

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