

# CAT CAIS Industry Member Reporting Scenarios

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## Executive Summary

This document is a companion document to the [CAT Reporting Customer and Account Technical Specifications for Industry Members-Full CAIS \("Technical Specifications"\)](#) 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 &amp; 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>
2.2.1	2/4/2022	Consolidated Audit Trail, LLC	<p>Corrected errors in description and clarified reporting firm in Scenarios 4.2.4 - DVP/RVP Account with a Clearing Number and 4.2.5 - DVP/RVP Account with Bank Depository ID</p> <p>Added <i>clearingBrokerID</i> attribute to Scenario 4.2.4</p>
<a href="#">2.3</a>	<a href="#">4/22/2022</a>	<a href="#">Consolidated Audit Trail, LLC</a>	<p><a href="#">Added of Scenario 2.1.7 – Setting an FDID to 'INACTIVE'</a></p> <p><a href="#">Added of Scenario 2.1.8 – Repairing an FDID Data Type Violation Error</a></p> <p><a href="#">Added Scenario 3.5.5 - Repairing a Customer Record Rejection Due to the FDID being Rejected</a></p> <p><a href="#">Added Scenario 4.2.3 – Account with Specifically Designated Industry Member Employee Broker as Authorized Trader (Prior Scenarios 4.2.4 thru 4.2.7 are now 4.2.5 thru 4.2.8)</a></p> <p><a href="#">Added Section 4.3 – Nullifying FDID and Customer Record Attributes, and added Scenarios 4.3.1 – Nullifying Attributes via Omission and 4.3.2 – Nullifying Attributes Using 'null' Value</a></p> <p><a href="#">Added Scenario 5.4.1 – Correcting an Erroneous TID Value and retitled Section 5.4</a></p> <p><a href="#">Added Section 6 Correction List, and addition of Scenario 6.1.1 - Deleting a Malformed FDID Rejection and Scenario 6.1.2 – Correcting a Malformed FDID Rejection. Moved prior Scenario 3.4.3 – Correcting a Malformed TID Error to Scenario 6.1.3, and added additional description language</a></p> <p><a href="#">Added additional submission options to Age of Majority examples in Scenario 4.2.7 – UGMA/UTMA Custodied Account</a></p> <p><a href="#">Added <i>roleEndReason</i> and <i>roleEndDate</i> to Customer on <i>fdidRecordID</i> '1' and additional description regarding ending Customer associations and the replacing FDID in Scenario 2.1.4 – FDID Replaced by Another FDID Within the Same Firm</a></p> <p><a href="#">Scenario 2.4.2 – Receiving Firm Submission - removed <i>largeTraderRecordID</i> '2' from submission</a></p>

Version	Date	Author	Description
			<p><u>Changed <i>accountType</i> and <i>customerType</i> for <i>customerRecordID</i> '2', and added language to description regarding dates in Scenario 2.6.3 – FDID with Multiple LTIDs</u></p> <p><u>Updated description of scenario regarding <i>roleEndReason</i> of 'REPLACED' and <i>roleStartDate</i> and <i>roleEndDate</i>, and updated <i>roleStartDate</i> in Updating Resubmission in Scenario 3.4.1 – Change in Customer's Input Identifier – Same TID Type</u></p> <p><u>Updated description of scenario, changed <i>roleStartDate</i> on <i>customerRecordID</i> '2' and removed <i>foreignTIDCountryCd</i> from <i>customerRecordID</i> '1' in <i>tidRecordList</i> in Scenario 3.4.2 – Change in Customer's Input Identifier – Differing TID Types</u></p> <p><u>Moved prior Scenario 5.4.1 – Reporting Change in EIN to 3.4.3 - Updated title and description of scenario regarding <i>roleEndReason</i> of 'REPLACED' and <i>roleStartDate</i> and <i>roleEndDate</i>, corrected <i>replacedByTID</i> value, and included <i>roleEndDate</i> and <i>roleEndReason</i> for <i>customerRecordID</i> '1' of <i>fdidRecordID</i> '1' in the Updating Resubmission</u></p> <p><u>Moved prior Scenario 4.1.2 – Reporting Multiple Firm Owned Accounts to Scenario 3.5.1. Updated title and enhanced description of submission examples (Prior Scenarios 3.5.1, 3.5.2 and 3.5.3 are now 3.5.2 thru 3.5.4; Prior Scenario 4.1.3 is now 4.1.2)</u></p> <p><u>Updated scenario title and <i>role</i> for <i>customerRecordID</i> '589', removed <i>customerRecordID</i> '415' from <i>tidRecordList</i>, added description language to describe submission in Scenario 4.2.2 Account Holder and Industry Member as Authorized Trader</u></p> <p><u>Updated <i>role</i> of <i>customerRecordID</i> '1' and clarified perspective of reporting Industry Member in Scenario 4.2.5 - DVP/RVP Account with a Clearing Number</u></p> <p><u>Corrected <i>roleStartDate</i> for <i>customerRecordID</i> '1' in Option 2, added language describing the submissions for Scenario 4.2.8 – Adding Holders or Authorized Traders to an Account</u></p> <p><u>Updated Scenario 5.2 – Resolving an Intra-Firm Material Inconsistency – Added additional language to the description, addition of TID record for Marie Doe in Original Submission</u></p> <p><u>Updated Scenario 5.3 – Resolving an Inter-Firm Material Inconsistency to include Bob Doe in all submissions and correction of <i>customerRecordID</i> in Original Submission</u></p> <p><u>Updated Scenario 5.5 – Resolving a Customer Record Type Inconsistency - separated the Natural Person and Legal Entity into separate submissions, added <i>updateNotification</i> attribute in Updating Submission</u></p> <p><u>Added additional clarifying language to Section 3.2 – Legal Entity Customer and Section 3.5 - Multiple Versions of a Customer within a Submission File</u></p> <p><u>Additional clarifications, enhancements and/or updates to the descriptions of the following scenarios:</u></p> <ul style="list-style-type: none"> <li><u>• Scenario 2.1.1.1 - Account FDIDs - clarified FDID represents an account</u></li> <li><u>• Scenario 2.1.1.2 – Relationship FDIDs and Scenario 4.2.4 – Relationship ID Based FDID – clarified <i>role</i> of Customer</u></li> <li><u>• Scenario 2.1.1.3 – Entity ID FDIDs – clarified when <i>fdidType</i> of 'ENTITYID' applies and <i>role</i> of the Customer</u></li> </ul>



Version	Date	Author	Description
			<ul style="list-style-type: none"> <li>• <u>Scenario 2.1.2 – Ending an FDID and Scenario 2.6.5 Ending an LTID Association to an FDID – clarified ending Customer and LTID associations when the FDID is ended</u></li> <li>• <u>Scenario 2.1.3 – Ending an FDID Erroneously Reported - Added clarifications regarding ending Customer associations</u></li> <li>• <u>Scenario 2.1.6 – Repairing an FDID rejection due to rejected Customer – added language that resubmission includes all required LTID and Customer associations</u></li> <li>• <u>Scenario 2.6.2 – FDID with one Unidentified Large Trader ID (ULTID) – Clarified ULTID reporting obligations</u></li> <li>• <u>Scenario 2.6.6 – Reestablishing an LTID Association to an FDID – Added language regarding <i>ltidEffectiveDate</i> and if multiple LTIDs are associated with the FDID</u></li> <li>• <u>Scenario 3.1.1 – Trust Using a Social Security Number – Updated the title of scenario and clarified example</u></li> <li>• <u>Scenario 2.1.5 – Reopening an Erroneously Ended FDID, Scenario 3.1.2 – Sole Proprietorship Using a Social Security Number, Scenario 3.2.1 – Name and Identifiers, Scenario 3.3.1 Customer with an Address Different from FDID Address, Scenario 3.3.2 – Customer with Multiple Addresses at the Customer Level, Scenario 4.1.2 – Firm Owned Average Price Account Used for Multiple Customer and Scenario 5.1 – Material Update to Previously Submitted Customer Data - Added additional language to the scenarios describing the submissions</u></li> <li>• <u>Scenario 3.5.2 – Multiple Versions of Natural Person Customer with Multiple Customer Records and Scenario 3.5.4 – Repairing a Customer Record Rejection Due to Another Version of Customer Being Rejected – Updated titles and added additional language to the scenarios describing the submissions</u></li> <li>• <u>Scenario 4.2.6 – DVP/RVP Account with Bank Depository ID - clarified perspective of reporting Industry Member</u>  <u>Added Warning, Inconsistency and Error Codes to descriptions as applicable</u>  <u>Change “CAT Reporter” and “firm” to Industry Member” and “should” to “must” in “applicable scenarios</u>  <u>Addition of <i>clearingBrokerID</i> attribute where applicable</u>  <u>Removal of ‘BROKERAGE’ and ‘ADVISED’ <i>accountType</i> values where applicable</u>  <u>Replacement of <i>primeBrokerID</i> and <i>bankDepositoryID</i> with <i>DVPCustodianID</i> where applicable</u> </li> </ul>

## 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-Full CAIS](#).

All names, addresses, and identifiers data used for examples in the Customer and Account information reports are purely fictional and 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- Full CAIS](#) 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~~ when the FDID represents an account. 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~~ Industry Member submits an account which was opened on July 1, 2020. The ~~CAT Reporter firm~~ Industry Member also reports one CAT Customer, who is the account holder.

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A2042",       "fdidType": "ACCOUNT",       "accountType": [<del>"BROKERAGE"</del>, "MARGIN"],       "accountName": "CustAcct1",       "branchOfficeCRD": 99999,       <del>"clearingBrokerID": ["1234"],</del>       "fdidDate": 20200701,       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "10 FIFTH AVE",           "addrLine2": "SUITE 1000",           "city": "BROOKLYN",           "regionCode": "US-NY",           "countryCode": "US",           "postalCode": "11201"         }       ],       "fdidCustomerList": [         {           "customerRecordID": 1,</pre>

File	Data
	<pre>                 "role": "TRDHOLDER",                 "roleStartDate": 20200701             }         ]     },     "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* ~~must~~ will be 'RELATIONSHIP', and the *accountType* array must include 'RELATIONSHIP' (but ~~must~~ may also include other applicable values). In addition, since the *fdidType* for the FDID is 'RELATIONSHIP', the *role* of the associated Customer must be 'TRDHOLDER'. The *fdidDate* will be the date on which the relationship was established.

In this example, the ~~CAT Reporter firm~~ Industry Member submits a Relationship ID FDID which was established on August 1, 2020. The ~~CAT Reporter firm~~ Industry Member 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, </pre>

File	Data
	<pre> "fdidDate": 20100801, "clearingBrokerID": ["1234"], "addressList": [   {     "addrType": "ADDRESS1",     "addrLine1": "1 WATERS ST",     "city": "JERSEY CITY",     "regionCode": "US-NJ",     "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. An *fdidType* of 'ENTITYID' must only be used when an employee of the Industry Member is exercising discretion over multiple client accounts and creates an aggregated order for which a trading account number of the Industry Member is not available at the time of order origination. Refer to FAQ M15 for additional information regarding Entity IDs. The *fdidType* will be 'ENTITYID', and the *accountType* array must include 'ENTITYID' (but may also include other applicable values). In addition,

since the *fdidType* for this FDID is 'ENTITYID', the *role* of the associated Customer must be 'TRDHOLDER'.

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 Industry Member must also reports ~~themselves-itself~~ 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,       "clearingBrokerID": ["1234"],        "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>

File	Data
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 was previously been~~ submitted to, and accepted by, CAT CAIS, but the account ~~was subsequently has since been~~ closed. The ~~CAT Reporter firm~~ Industry Member must submit the FDID Record with an *fdidEndDate* and *fdidEndReason* populated. The Industry Member may explicitly end any LTID or Customer associations by including the *ltidEndDate* and *ltidEndReason* and the *roleEndDate* and *roleEndReason*. Alternatively, the Industry Member may implicitly end any LTID or Customer associations by omitting them from the ending submission. In that scenario, the *fdidEndDate* will be applied as the *roleEndDate* and *ltidEndDate* and the *fdidEndReason* will be applied as the *roleEndReason* and *ltidEndReason*. When ending an FDID Record that was previously accepted with one or more Customers, Industry Members are 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* in the ending submission when ending an FDID. In the scenario where the *fdidCustomerList* is omitted from the ending submission, the *fdidEndReason* will be applied as the *roleEndReason*. If the *role* is ended for a reason that differs from the *fdidEndReason*, then the Industry Member must explicitly end the Customer's *role* by including the *fdidCustomerList* and all required attributes of the list.~~

~~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. In this scenario, the Industry Member must populate an *fdidEndReason* of 'ENDED' for the closed account. In addition, the Industry Member implicitly ends all LTID and Customer associations by omitting them from the ending submission.~~

#### Ending Submission

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "IA7774",       "fdidType": "ACCOUNT",       "accountType": ["<del>BROKERAGE</del>OTHER"],       "accountName": "CUSTOMER ACCOUNT1",       "fdidEndDate": 20220814,       "fdidEndReason": "ENDED",       "fdidDate": 20080710,       "<u>clearingBrokerID": ["1234"],</u>       "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~~was 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/Industry Member is able to~~must resubmit the FDID Record with an *fdidEndReason* of 'CORRECTION'. In addition, the *fdidEndDate* must be the same as the *fdidDate* to indicate that the FDID Record should never have been submitted to CAIS~~The submission must contain all required attributes for the FDID record, such as *fdidDate* and *accountType*.~~

When ending an FDID Record that was previously accepted with one or more Customers, Industry Members are not required to include the *fdidCustomerList* in the correcting submission. In the scenario where the *fdidCustomerList* is omitted from the correcting submission, the *fdidEndReason* will be applied as the *roleEndReason*. If the *role* is ended for a reason that differs from the *fdidEndReason*, the Industry Member must explicitly end the Customer's *role* by including the *fdidCustomerList* and all required attributes of the list.



In this scenario, the ~~CAT Reporter firm~~ Industry Member submits the account with an ~~fdidEndDate~~ and ~~must~~ populate the ~~fdidEndReason~~ with 'CORRECTION' to indicate that the FDID Record was submitted in error.

### Correcting Submission

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "IA1957",       "fdidType": "ACCOUNT",       "accountType": [<del>"BROKERAGE</del>"OTHER"],       "accountName": "GEORGE SMITH INVESTMENTS",       "branchOfficeCRD": 12345,       "fdidEndDate": <del>20090815</del>20210715,       "clearingBrokerID": ["1234"],       "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~~ was 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 ~~must~~ should be used.

## Original Submission

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

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "IA7484",       "fdidType": "ACCOUNT",       "accountType": ["FIRM"],       "accountName": "Firm Acct1",       "branchOfficeCRD": 12345,       "fdidDate": 20160529,       "clearingBrokerID": ["1234"],       "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>

File	Data
	] }

### **Replacing/Updating Submission**

In order to replace the FDID, the Industry Member must submit the FDID Record with an *fdidEndReason* of 'REPLACED' and include the *replacedByFDID* attribute populated with the replacing FDID value. The *replacedByFDID* value included in a submission file must reference an FDID that is either included in the current submission file or was accepted by CAT CAIS in a prior submission file.

The Industry Member may explicitly end any LTID or Customer associations by including the *ltidEndDate* and *ltidEndReason* and the *roleEndDate* and *roleEndReason*. Alternatively, the Industry Member may implicitly end any LTID or Customer associations by omitting them from the updating submission. In that scenario, the *fdidEndDate* will be applied as the *roleEndDate* and *ltidEndDate* and the *fdidEndReason* will be applied as the *roleEndReason* and *ltidEndReason*. When replacing an FDID, Industry Members are not required to include the *fdidCustomerList*.

~~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 LTID and Customer associations will not be moved to the replacing FDID Record, and as such the thus the firm Industry Member 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.~~

In this example, *firmDesignatedID* 'IA7484' is being replaced with 'IA0005'. The Industry Member explicitly ends the Customer's role on the replaced FDID by including the *roleEndDate* and *roleEndReason* of 'REPLACED'. In addition, the Industry Member includes the replacing FDID Record in the same submission file as the replaced FDID Record.

File	Data
Data	{ "fdidRecordList": [ { "fdidRecordID": 1, "firmDesignatedID": "IA7484",

File	Data
	<pre> "fdidType": "ACCOUNT", "accountType": ["FIRM"], "accountName": "Firm Acct1", "branchOfficeCRD": 12345, "fdidEndDate": 20210710, "fdidEndReason": "REPLACED", "replacedByFDID": "IA0005", "fdidDate": 20160529, "clearingBrokerID": ["1234"], "addressList": [   {     "addrType": "ADDRESS1",     "addrLine1": "1 WATERS ST",     "city": "JERSEY CITY",     "regionCode": "US-NJ",     "countryCode": "US",     "postalCode": "07097"   } ], "fdidCustomerList": [   {     "customerRecordID": 1,     "role": "TRDHOLDER",     "roleStartDate": 20160529,     "roleEndDate": 20210710,     "roleEndReason": "REPLACED"   } ] }, {   "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",       "countryCode": "US",       "postalCode": "07097"     }   ],   "largeTraderList": [     {       "largeTraderRecordID": 1,       "largeTraderID": "99999999-9999",       "ltidEffectiveDate": 20210710     }   ],   "fdidCustomerList": [ </pre>

File	Data
	<pre>         {           "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 FDID Record has been previously submitted to, and accepted by, CAT CAIS, and subsequently erroneously ended for a reason other than 'REPLACED' in a later submission. Upon discovering that the FDID Record was erroneously ended, the Industry Member must report the FDID's correct status to CAIS. This is accomplished by excluding the *fdidEndDate* and *fdidEndReason* attributes within the correcting submission, which will nullify these fields and reflect the FDID's correct status in CAIS. Also in the correcting submission, the Industry Member must reestablish any necessary LTID-to-FDID and Customer-to-FDID associations.

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, t~~The GAT Reporter firm/Industry Member submits the same an account FDID Record with the same data as that

was 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 with Erroneous FDID End Reason and FDID Date**

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A3019",       "fdidType": "ACCOUNT",       "accountType": ["INSTITUTION"],       "accountName": "TRDNG ACCT IA3019",       "branchOfficeCRD": 12345,       "fdidDate": 20210706,       "clearingBrokerID": ["1234"],       "<del>"fdidEndDate"</del>": 20220815,       "<del>"fdidEndReason"</del>": "<del>"ENDED"</del>",       "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 Correcting Submission with Omitted FDID End Reason and FDID Date**

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A3019",       "fdidType": "ACCOUNT",       "accountType": ["INSTITUTION"],       "accountName": "TRDNG ACCT IA3019",       "branchOfficeCRD": 12345,       "fdidDate": 20210706,       "clearingBrokerID": ["1234"],       "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": [     {</pre>

File	Data
	<pre> "customerRecordID": 1, "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 with Error

The Customer Record associated to the FDID is rejected due to a missing *legalName* (~~error code~~[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~~[Error Code 22048](#)). Both errors are resolved by ~~C~~correcting the ~~original~~ *legalName* ~~error will repair all associated rejections and resubmitting the entire FDID Record in its current state with all required LTID and Customer associations.~~

File	Data
Data	<pre> { "fdidRecordList": [ { "fdidRecordID": 1, "firmDesignatedID": "1A4029", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "accountName": "TRDNG ACCT123", "fdidDate": 20060519, <del>"clearingBrokerID": ["1234"],</del> "addressList": [ { </pre>



File	Data
	<pre>                 "addrType": "ADDRESS1",                 "addrLine1": "1 WATERS ST",                 "city": "JERSEY CITY",                 "regionCode": "US-NJ",                 "countryCode": "US",                 "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-Repairing Submission**

In this submission, the firm **corrects-repairs** 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 Industry Member** 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"], </pre>

File	Data
	<pre> "accountName": "TRDNG ACCT123", "fdidDate": 20060519, "clearingBrokerID": ["1234"], "addressList": [   {     "addrType": "ADDRESS1",     "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>

### **2.1.7. Setting an FDID to 'INACTIVE'**

This scenario illustrates the CAT reporting requirements when an Industry Member optionally designates an FDID as 'INACTIVE' in CAIS. If an FDID remains open but has had no CAT-reportable activity within the prior six-month period, the Industry Member has the option, but is not obligated to, inactivated it in CAIS by reporting an *fdidEndReason* of 'INACTIVE'. An *fdidEndReason* of 'INACTIVE' indicates the FDID is not in scope for Full Record Refresh requirements, and FDIDs marked as 'INACTIVE' are not required to be updated in CAIS. However, if the inactivated FDID subsequently has any CAT-reportable events

reported to the Transaction database, the Industry Member must reactivate the FDID in CAIS by the CAIS reporting deadline. This is accomplished by resubmitting the entire FDID record in its current state (with all required LTID and Customer associations) with null values for the *fdidEndDate* and *fdidEndReason* attributes.

In this Scenario, FDID 1A7289 was previously submitted to, and accepted by, CAIS. Since the FDID remains open but has had no CAT-reportable activity within the prior six-month period, the Industry Member optionally inactivates it in CAIS by reporting an *fdidEndReason* of 'INACTIVE' and populates an *fdidEndDate*.

### Inactivating Submission

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A7289",       "fdidType": "ACCOUNT",       "accountType": ["OTHER"],       "accountName": "IA7289 ACCT",       "fdidDate": 20190516,       "clearingBrokerID": ["1234"],       "fdidEndDate": 20220711,       "fdidEndReason": "INACTIVE",       "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": 20190516         }       ]     }   ],   "naturalPersonCustomerList": [     {       "customerRecordID": 1,       "firstName": "Haley",       "lastName": "Smith",       "yearOfBirth": 1989,       "customerType": ["NOTAPPLICABLE"]     }   ] }</pre>

File	Data
	<pre> } ] } </pre>
TIDs	<pre> {   "tidRecordList": [     {       "customerRecordID": 1,       "tidType": "SSN/ITIN",       "tidValue":         "d1a3d2b7a1b3df5800da00a66ba005f60370321da09f21ce723723526ce9e8c8"     }   ] } </pre>

### **Reactivating Submission**

Once FDID 1A7289 has CAT-reportable events reported to the Transaction database, the Industry Member must reactivate the FDID in CAIS. This is accomplished by resubmitting the entire FDID record in its current state (with all required LTID and Customer associations) with null values for the *fdidEndDate* and *fdidEndReason* attributes or by omitting the *fdidEndDate* and *fdidEndReason* attributes from the reactivating submission.

In this example, the Industry Member has opted to reactive the FDID by omitting the *fdidEndDate* and *fdidEndReason* attributes from the reactivating submission.

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A7289",       "fdidType": "ACCOUNT",       "accountType": ["OTHER"],       "accountName": "IA7289 ACCT",       "fdidDate": 20190516,       "clearingBrokerID": ["1234"],       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "10 ELM STREET",           "addrLine2": "BUILDING 5",           "addrLine3": "STE 10",           "city": "RICHMOND",           "regionCode": "US-NC",           "countryCode": "US",           "postalCode": "28379"         }       ]     }   ], } </pre>

File	Data
	<pre> "fdidCustomerList": [   {     "customerRecordID": 1,     "role": "TRDHOLDER",     "roleStartDate": 20190516   } ], "naturalPersonCustomerList": [   {     "customerRecordID": 1,     "firstName": "Haley",     "lastName": "Smith",     "yearOfBirth": 1989,     "customerType": ["NOTAPPLICABLE"]   } ] </pre>
TIDs	<pre> {   "tidRecordList": [     {       "customerRecordID": 1,       "tidType": "SSN/ITIN",       "tidValue": "d1a3d2b7a1b3df5800da00a66ba005f60370321da09f21ce723723526ce9e8c8"     }   ] } </pre>

### **2.1.8. Repairing an FDID Data Type Violation Error**

This scenario illustrates the CAT Reporting requirements when an attribute of a submitted FDID violates the prescribed data type for the attribute. The error can be repaired by resubmitting the FDID Record with the correct data type for the attribute which encountered the error.

#### **Submission with Error**

In this submission, the *fdidDate* attribute is in a Text format with double-quotes instead of the prescribed Data format for the Date data type attribute. This causes the FDID Record to be rejected due to a data type violation (Error Code 22034) and an invalid *fdidDate* (Error Code 22007). The Customer Record is also rejected because the FDID was rejected (Error Code 22523).

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A3633",       "fdidType": "ACCOUNT", </pre>

File	Data
	<pre> "accountType": ["OTHER"], "accountName": "IA3633 ACCT", "fdidDate": "20020319", "clearingBrokerID": ["1234"], "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": 20020319   } ] }, "naturalPersonCustomerList": [   {     "customerRecordID": 1,     "firstName": "Adam",     "lastName": "Smith",     "yearOfBirth": 1979,     "customerType": ["NOTAPPLICABLE"]   } ] } </pre>
TIDs	<pre> {   "tidRecordList": [     {       "customerRecordID": 1,       "tidType": "SSN/ITIN",       "tidValue": "568ca6d8af479889d124c329061ea0762a9c87abc3c80fddb659804477531e1a"     }   ] } </pre>

### **Repairing Submission**

In the resubmission, the user removes the double-quotes from the *fdidDate* value and resubmits the FDID Record with the required Customer association. This resolves all three rejections associated to the record.

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A3633",       "fdidType": "ACCOUNT",       "accountType": ["OTHER"],       "accountName": "IA3633 ACCT",       "fdidDate": 20020319,       "clearingBrokerID": ["1234"],       "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": 20020319         }       ]     }   ],   "naturalPersonCustomerList": [     {       "customerRecordID": 1,       "firstName": "Adam",       "lastName": "Smith",       "yearOfBirth": 1979,       "customerType": ["NOTAPPLICABLE"]     }   ] } </pre>
TIDs	<pre> {   "tidRecordList": [     {       "customerRecordID": 1,       "tidType": "SSN/ITIN",       "tidValue":         "568ca6d8af479889d124c329061ea0762a9c87abc3c80fddb659804477531e1a"     }   ] } </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 Industry Member](#) submits an account address with three address lines. The [CAT Reporter firm Industry Member](#) also reports one CAT Customer, who is the account holder.

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A2115",       "fdidType": "ACCOUNT",       "accountType": ["<del>BROKERAGE</del>OTHER"],       "accountName": "IA2115 ACCT",       "branchOfficeCRD": 99999,       "fdidDate": 20070512,       "<del>clearingBrokerID": ["1234"],</del>       "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,</pre>



File	Data
	<pre> "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/Industry Member** 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": ["<del>BROKERAGE</del>OTHER"], "accountName": "IA0492 ACCT", "branchOfficeCRD": 99999, "fdidDate": 20070512, "<u>"clearingBrokerID": ["1234"],</u> "addressList": [ { "addrType": "ADDRESS1", "addrLine1": "10 ELM STREET", "addrLine2": "BUILDING 5", "addrLine3": "STE 10", "city": "RICHMOND", </pre>

File	Data
	<pre> "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" } ], "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 the 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~~ Industry Member submits an FDID with one account holder who has authorization to trade on the account.

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A2449",       "fdidType": "ACCOUNT",       "accountType": ["<del>BROKERAGE</del>OTHER"],       "accountName": "Jason's Account",       "branchOfficeCRD": 99999,       "fdidDate": 20190812,       "<u>clearingBrokerID": ["1234"],</u>       "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, </pre>

File	Data
	<pre> "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~~ Industry Member 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", <del>"BROKERAGE"</del>], "accountName": "Bernard's UGMA Account", "branchOfficeCRD": 99999, "fdidDate": 20151101, <del>"clearingBrokerID": ["1234"],</del> "addressList": [ { "addrType": "ADDRESS1", "addrLine1": "555 PALM PLACE", "city": "RICHMOND", "regionCode": "US-NC", "countryCode": "US", "postalCode": "28379" } ], "fdidCustomerList": [ { "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20151101 }, </pre>

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

## 2.4. Transferring an FDID Due to a Corporate Event

This section illustrates [the](#) CAT reporting requirements in the instance of account transfers from one [CAT Reporter firm/Industry Member](#) 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~~Industry Member 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~~Industry Member 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~~Industry Member 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 examplescenario, the transferring ~~CAT Reporter firm~~Industry Member submits three accounts with *fdidEndDates* and *fdidEndReasons* of 'TRANSFER'. The accounts must also be reported to CAIS by the ~~CAT Reporter firm~~Industry Member to whom the accounts are being transferred, as represented in Reporting Scenario 2.4.2: Receiving Firm Submission2.4.2.

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "TransferredAcct1",       "fdidType": "ACCOUNT",       "accountType": ["<del>BROKERAGE</del>OTHER"],       "accountName": "Transferred FDID No. 1",       "fdidEndDate": 20210718,       "fdidEndReason": "TRANSFER",       "fdidDate": 20110220,       "<u>clearingBrokerID": ["1234"]</u>,       "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",</pre>

File	Data
	<pre> "fdidType": "ACCOUNT", "accountType": ["<u>BROKERAGEOTHER</u>"], "accountName": "Transferred FDID No. 2", "fdidEndDate": 20210718, "fdidEndReason": "TRANSFER", "fdidDate": 20040728, <u>"clearingBrokerID": ["1234"],</u> "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", "accountType": ["<u>BROKERAGEOTHER</u>"], "accountName": "Transferred Acct No. 3", "fdidEndDate": 20210718, "fdidEndReason": "TRANSFER", "fdidDate": 19990823, <u>"clearingBrokerID": ["1234"],</u> "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, </pre>

File	Data
	<pre> "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, "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 firmIndustry Member 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 ReporterIndustry Member 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~~ Industry Member submits three accounts it received from the Transferring Firm in Reporting Scenario 2.4.1: Transferring Firm Submission 2.4.1.

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "ReceivedAcct1",       "fdidType": "ACCOUNT",       "accountType": ["<del>BROKERAGEOTHER</del>"],       "accountName": "Received FDID No. 1"       "fdidDate": 20210718,       "<u>clearingBrokerID": ["1234"],</u>       "priorCATReporterCRD": 5555,       "priorCATReporterFDID": "TransferredAcct1",       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "50 N MAPLE",           "city": "KANSAS CITY",           "regionCode": "US-MO",           "countryCode": "US",           "postalCode": "64031"         }       ],       "largeTraderList": [         {           "largeTraderRecordID": 1,           "largeTraderID": "77777777-7777",           "ltidEffectiveDate": 20210718         }       ],       "<del>"largeTraderRecordID": 2,</del>       "<del>"largeTraderID": "ULT00001-7777",</del>       "<del>"ltidEffectiveDate": 20210718</del>     },     {       "fdidCustomerList": [         {           "customerRecordID": 1,           "role": "TRDHOLDER",           "roleStartDate": 20210718         }       ],       "fdidRecordID": 2,     }   ] } </pre>

File	Data
	<pre> "firmDesignatedID": "ReceivedAcct2", "fdidType": "ACCOUNT", "accountType": ["<del>BROKERAGE</del>OTHER"], "accountName": "Received FDID No. 2", "clearingBrokerID": ["1234"], "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": ["<del>BROKERAGE</del>OTHER"], "accountName": "Received Acct No. 3", "priorCATReporterCRD": 5555, "priorCATReporterFDID": "TransferredAcct3", "fdidDate": 20210718, "clearingBrokerID": ["1234"], "addressList": [   {     "addrType": "ADDRESS1",     "addrLine1": "10 WILLIAMS ST.",     "city": "AMES",     "regionCode": "US-IA",     "countryCode": "US",     "postalCode": "50014"   } ], "fdidCustomerList": [   {     "customerRecordID": 3,     "role": "TRDHOLDER",     "roleStartDate": 20210718   } ] }, "naturalPersonCustomerList": [   { </pre>

File	Data
	<pre> "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", "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 ~~a clearing firm's~~ the CAT reporting requirements for accounts custodied by a clearing firm ~~CAT Reporter~~Industry Member 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~~Industry Member 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~~Industry Member also reports one account holder for each account.

#### ~~CAT Reporter~~Industry Member'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,       "firmDesignatedID": "1A0012",       "fdidType": "ACCOUNT",       "accountType": ["<del>OTHERBROKERAGE</del>"],       "accountName": "CustAcct1",       "fdidDate": 20200701,       "<del>clearingBrokerID</del>": ["1234"],       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "10 FIFTH AVE",           "addrLine2": "SUITE 1000",           "city": "BROOKLYN",           "regionCode": "US-NY",           "countryCode": "US",           "postalCode": "11201"         }       ],       "fdidCustomerList": [         {</pre>

File	Data
	<pre> "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 Industry Member's Submission for Correspondent 9999**

File	Data
Data	<pre> { "version": "2.0.0", "catReporterCRD": 123456, "catSubmitterID": 123456, "correspondentCRD": 9999, "fdidRecordCount": 1, "naturalPersonCustomerRecordCount": 0, "legalEntityCustomerRecordCount": 1, "fdidRecordList": [ { "fdidRecordID": 1, "firmDesignatedID": "IA0013", "fdidType": "ACCOUNT", "accountType": ["<del>BROKERAGE</del>OTHER"], "accountName": "CustAcct2", "fdidDate": 20190821, "clearingBrokerID": ["1234"], "addressList": [ { "addrType": "ADDRESS1", "addrLine1": "5 MARKET PL", "city": "DOVER", </pre>

File	Data
	<pre> "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

Clearing Firms and Introducing Brokers have their own separate and distinct CAIS reporting obligations.

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 Industry Member firm reports the account with the FDID assigned by theirs 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": ["<del>BROKERAGE</del>OTHER"],       "accountName": "CustodiedAcctl",       "fdidDate": 20130428,       "<u>clearingBrokerID": ["1234"],</u>       "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>
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": ["<del>BROKERAGE</del>OTHER"],       "accountName": "CustomerAccount123",       "fdidDate": 20130915,       "<del>clearingBrokerID": ["1234"],</del>       "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": [     {       "customerRecordID": 1,       "legalName": "Originating Customer Inc.",       "ein": "00-3838211",       "customerType": ["NOTAPPLICABLE"]     }   ] } </pre>
TIDs	<pre> {   "tidRecordList": [     {       "customerRecordID": 1,       "tidType": "EIN",       "tidValue": "7b1599709a6bb3cce97df911d58abf8303aca660e309dc12639c15921ab0e6dd"     }   ] } </pre>



File	Data
	<pre> } ] } </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~~ Industry Member is required to report the account to CAT CAIS, as well as the associated LTID and Customer data. The ~~CAT Reporter firm~~ Industry Member also reports one CAT Customer, who is the account holder.

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A8573",       "fdidType": "ACCOUNT",       "accountType": ["<del>BROKERAGE</del>OTHER"],       "accountName": "LargeTradingAccount",       "branchOfficeCRD": 12345,       "fdidDate": 20110928,       "<del>clearingBrokerID": ["1234"],</del>       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "5 TENTH AVE",           "city": "DALLAS",           "regionCode": "US-TX",           "countryCode": "US",           "postalCode": "28379"         }       ],       "largeTraderList": [         {           "largeTraderRecordID": 1,           "largeTraderID": "55555555-5555",           "ltidEffectiveDate": 20110928         }       ],       "fdidCustomerList": [         {           "customerRecordID": 1,           "role": "TRDHOLDER",           "roleStartDate": 20110928         }       ]     }   ], } </pre>

File	Data
	<pre>"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~~ there is an Unidentified Large Trader ~~associated to the FDID-ID. The CAT Reporter firm also reports one CAT Customer, who is the account holder.~~ Any CAT Reporter that is a clearing firm or self-clearing firm with an obligation to assign an ULTID under the large trader rule is required to report any assigned ULTIDs associated to their FDIDs as part of their Customer and Account reporting. The ULTID must be reported in the proper format in the *largeTraderList*.

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A1948",       "fdidType": "ACCOUNT",       "accountType": ["<del>BROKERAGE</del>OTHER"],       "accountName": "ULTAcct1",       "branchOfficeCRD": 12345,       "fdidDate": 20151021,       "<del>clearingBrokerID": ["1234"],</del>       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "10 N MAPLE",           "city": "NEW YORK",           "regionCode": "US-NY", </pre>

File	Data
	<pre> "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.~~

~~In this example, the CAT Reporter firm Industry Member 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. ~~The RIA entered into the role of ‘AUTH3RD’ on June 5, 2017 and thus has a roleStartDate of~~

'20170605'. The date on which the RIA's Large Trader ID became associated to the FDID within the Industry Member's system was September 10, 2020, and thus has an *ltidEffectiveDate* of '20200910'.

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A1042",       "fdidType": "ACCOUNT",       "accountType": ["<u>INSTITUTIONAVERAGE</u>"],       "accountName": "LargeTradingAccount2",       "fdidDate": 20170605,       "<u>clearingBrokerID": ["1234"]</u>,       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "1000 PARKWAY DR",           "city": "BALTIMORE",           "regionCode": "US-MD",           "countryCode": "US",           "postalCode": "21201"         }       ],       "largeTraderList": [         {           "largeTraderRecordID": 1,           "largeTraderID": "44444444-4444",           "ltidEffectiveDate": 20170605         },         {           "largeTraderRecordID": 2,           "largeTraderID": "33333333-4444",           "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.", </pre>

File	Data
	<pre> "ein": "00-8734291", "customerType": ["ACCRDITED"], "lei": "R820KF73RWVX9104G22H" }, { "customerRecordID": 2, "legalName": "Registered Investment Mgmt Inc", "ein": "00-1821033", "customerType": ["<del>ADVISER</del>"], "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 Industry Member is required to report the account to CAT CAIS, as well as the associated LTIDs. The CAT Reporter firm Industry Member also reports one CAT Customer, who is the account holder.

File	Data
Data	<pre> { "fdidRecordList": [ { "fdidRecordID": 1, "firmDesignatedID": "1A0176", "fdidType": "ACCOUNT", "accountType": ["<del>BROKERAGE</del>OTHER"], "accountName": "LargeTradingAccount3", "branchOfficeCRD": 12345, "fdidDate": 20130514, "<u>clearingBrokerID": ["1234"],</u> "addressList": [ { </pre>

File	Data
	<pre> "addrType": "ADDRESS1", "addrLine1": "999 1ST PKWY", "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": ["<del>ADVISER</del>"], "lei": "22TR80KM4DWTZZ847W0P" } ] } ] </pre>
TIDs	<pre> { "tidRecordList": [ { </pre>

File	Data
	<pre> "customerRecordID": 1, "tidType": "EIN", "tidValue": "1aaefe40168d64ea816336de1a1d2eb8cd32df53de534d3fcd0ed52e290bb278" }, { "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~~was 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~~associated to the account. Any existing LTID associations not included in the ending submission will be implicitly ended with the same ~~roleEndDate~~ltidEndDate and ~~ltidroleEndReason~~ 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~~Industry Member 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~~Industry Member submits an FDID associated to a Large Trader ~~R~~record with an ~~ltidEndDate~~ and ~~ltidEndReason~~ of 'ENDED'. ~~The CAT Reporter firm also reports one CAT Customer, who is the account holder.~~

#### Option 1- Explicitly Ending the LTID Association

In this example, the ~~CAT Reporter firm~~Industry Member 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": [<del>"BROKERAGEOTHER"</del>], "accountName": "John's Trading Account", "branchOfficeCRD": 12345, "fdidDate": 20190924, <del>"clearingBrokerID": ["1234"]</del>, "addressList": [ </pre>

File	Data
	<pre>         {           "addrType": "ADDRESS1",           "addrLine1": "15 N FIRST ST",           "city": "TAMPA",           "regionCode": "US-FL",           "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- Implicitly Ending the LTID Association

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



File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A4627",       "fdidType": "ACCOUNT",       "accountType": ["<u>BROKERAGEOTHER</u>"],       "accountName": "John's Trading Account",       "branchOfficeCRD": 12345,       "fdidDate": 20190924,       "<u>clearingBrokerID": ["1234"],</u>       "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~~ Industry Member must resubmit the account and LTID association without ~~the~~ *ltidEndDate* or *ltidEndReason* attributes. Additionally, when an LTID to FDID association is ended and must be reestablished, the Industry Member must populate the *ltidEffectiveDate* with the date on which the LTID or ULTID became re-associated to the FDID within the CAT Reporter's system not the original LTID Effective Date. Also, if more than one LTID is associated to the FDID, all LTIDs must be included in the submission.

In this example, the ~~CAT Reporter firm~~ Industry Member submits an account associated to a Large Trader record and omits the *ltidEndDate* and *ltidEndReason* attributes. The ~~CAT Reporter firm~~ Industry Member also reports two CAT Customers.

### Reestablishing Resubmission

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A0593",       "fdidType": "ACCOUNT",       "accountType": ["<del>ADVISED</del>OTHER"],       "accountName": "John's Advised Account",       "branchOfficeCRD": 12345,       "fdidDate": 20190924,       "<del>clearingBrokerID": ["1234"],</del>       "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, </pre>

File	Data
	<pre> "role": "TRDHOLDER", "roleStartDate": 20190924 }, { "customerRecordID": 2, "role": "AUTH3RD", "hasDiscretion": true, "roleStartDate": 20190924 } ] } ], "naturalPersonCustomerList": [ { "customerRecordID": 1, "firstName": "John", "lastName": "Miller", "yearOfBirth": 1962, "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- Full CAIS](#) for additional information.

#### 3.1. Natural Person Customer

For CAIS reporting purposes, any Customer whose *tidType* is 'SSN/ITIN' must be reported to CAIS in the *naturalPersonCustomerList*, even if the natural person is not the account holder. Examples include but are not limited to accounts owned by a trust or sole proprietor where the *tidType* is 'SSN/ITIN'. In these scenarios, the Industry Member must populate all required fields for the *naturalPersonCustomerList*, including *firstName* and *lastName*. Failure to include these required fields will result in a rejection of the Customer Record and, ultimately the FDID Record. In addition, if *tidType* is 'SSN/ITIN', and the Customer is not in the *naturalPersonCustomerList*, the FDID Record will reject.

##### 3.1.1. Name and Year of Birth Trust Using a Social Security Number

This scenario illustrates the CAT reporting requirements when the account holder is a trust and the *tidType* is 'SSN/ITIN' 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. T, so the CAT Reporter Industry Member must populate the *firstName*, *lastName* and *yearOfBirth* fields with the data as it pertains to the natural person associated to the SSN. Enter the name of the trust in the *doingBusinessAs* field must be populated with the name of the trust and the *customerType* must include 'TRUST' and all other applicable allowable values as they pertain to the trust.

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A7758",       "fdidType": "ACCOUNT",       "accountType": ["<del>BROKERAGE</del>OTHER"],       "accountName": "CustAcct999",</pre>

File	Data
	<pre> "branchOfficeCRD": 12345, "fdidDate": 20090312, "clearingBrokerID": ["1234"], "addressList": [   {     "addrType": "ADDRESS1",     "addrLine1": "150 SW ORANGE ST",     "city": "BROOKLYN",     "regionCode": "US-NY",     "countryCode": "US",     "postalCode": "11201"   } ], "fdidCustomerList": [   {     "customerRecordID": 1,     "role": "TRDHOLDER",     "roleStartDate": 20090312   } ] ], "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 the account holder-customer is a sole proprietorship and the tidType is 'SSN/ITIN'.

~~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. In this example, the CAT Customer is a sole proprietorship reported to CAIS with an SSN as the Input Identifier. The Industry Member must populate the *firstName*, *lastName* and *yearOfBirth* fields with the data as it pertains to the natural person associated to the SSN. The *doingBusinessAs* field must be populated with the name of the sole proprietorship and the *customerType* must include all applicable allowable values as they pertain to the sole proprietorship.

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A3013",       "fdidType": "ACCOUNT",       "accountType": ["<del>BROKERAGE</del>OTHER"],       "accountName": "Sole Prop Acct1",       "fdidDate": 20150129,       "clearingBrokerID": ["1234"],        "addressList": [         {           "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>

File	Data
	] }
TIDs	{ "tidRecordList": [ { "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "fe005258ee2114bcef531e2ff09d1fa3aea5a33dd2b32ee045d028d323386b1f" } ] }

## 3.2. Legal Entity Customer

For CAIS reporting purposes, a Legal Entity is a CAT Customer whose Input Identifier used to generate the Customer's TID is an EIN, or, for a Foreign Legal Entity, a National Registration or Tax Identifier, LEI or other Government-Issued Identifier issued by a non-national level government body or agency, such as a regional agency. These Customers must be reported to CAIS in the *legalEntityCustomerList*.

### 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 a different~~ 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 Ccustomer's TID was an EIN, the EIN must be populated in plain text in the *ein* attribute in the Data file.~~ Additionally, the Legal Entity Identifier (LEI) of the Ccustomer must be ~~populated~~~~reported in~~ ~~as~~ the *lei* attribute, if known to the firm.;

~~If the Input Identifier used to generate the Customer's TID was an LEI, the LEI must be populated in plain text in the *lei* attribute in the Data file. and must be provided if the Input Identifier used to generate the customer's TID was an LEI.~~

In this example, the ~~CAT Reporter~~Industry Member 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~~ Customer whose TID was generated from an EIN. The Industry Member must populate the EIN in plain text in the Data file.

File	Data
Data	{

File	Data
	<pre> "fdidRecordList": [   {     "fdidRecordID": 1,     "firmDesignatedID": "IA0867",     "fdidType": "ACCOUNT",     "accountType": ["<u>BROKERAGEOTHER</u>"],     "accountName": "Austin Corp",     "branchOfficeCRD": 12345,     "fdidDate": 20120520,     "<u>clearingBrokerID</u>": ["1234"],     "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 and must 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 when the Industry Member maintains addresses at the FDID level and Customer level. 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~~ Customer has a different address than the account so the Industry Member must report both addresses to CAIS: the address associated with the account must be reported as the FDID address and the Customer's address must be reported in the Customer Record. ~~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": ["<del>BROKERAGE</del>OTHER"],       "accountName": "TrdAcct555",       "branchOfficeCRD": 12345,       "fdidDate": 20120102,       "<del>clearingBrokerID": ["1234"],</del>       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "10 BRIDGE ST",           "city": "BROOKLYN",           "regionCode": "US-NY",           "countryCode": "US",           "postalCode": "11201"         }       ]     }   ],   "fdidCustomerList": [     {       "customerRecordID": 1,       "role": "TRDHOLDER",</pre>

File	Data
	<pre>                 "roleStartDate": 20120102             }         ]     },     "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 the CAT reporting requirements for a customer having when the Industry Member maintains addresses at both the FDID level and Customer level and the Customer has multiple addresses. When reporting multiple address records are included, the Industry Member 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 Customer has four addresses so the Industry Member must report the address for the FDID and all four Customer addresses the CAT Reporter firm is submitting a CAT Customer with four address records. The four Customer addresses are denoted in the *addressList* in the Customer Record as 'ADDRESS1', 'ADDRESS2', 'ADDRESS3', and 'ADDRESS4'.

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A3330",       "fdidType": "ACCOUNT",       "accountType": ["<u>BROKERAGEOTHER</u>"],       "accountName": "-TradingAcct000",       "branchOfficeCRD": 99999,       "fdidDate": 20061214,       "<u>clearingBrokerID": ["1234"],</u>       "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",         }       ]     }   ] } </pre>

File	Data
	<pre>         "postalCode": "60007"       },       {         "addrType": "ADDRESS3",         "addrLine1": "500 S 100TH AVE",         "addrLine2": "BLDG 2",         "city": "CHICAGO",         "regionCode": "US-IL",         "countryCode": "US",         "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~~when the Input Identifier ~~that~~which an ~~CAT Reporter~~Industry Member firm previously used to generate a ~~Natural Person~~ Customer’s TID ~~washas been~~ legally changed and the type of Input Identifier used to generate the TID value (tidType) remained the same. If the Customer is associated to more than one FDID at the Industry Member, the Industry Member must update the TID on all FDIDs that the Customer is associated to. In addition, the Industry Member must explicitly end the Customer’s previous role by including a roleEndDate and roleEndReason of ‘REPLACED’. When replacing a TID due to a legal change in Input Identifier, it is not permissible to omit the Customer’s previous role.

In this scenario, the Industry Member reports the Customer to CAIS for the first time using the Customer's ITIN as the Input Identifier. The Customer subsequently gained U.S. citizenship and was assigned an SSN. The Customer notified the Industry Member of its newly assigned SSN so the Industry Member must update the Customer Record. While the TID was legally changed from an ITIN to SSN, the type of Input Identifier used to generate the TID value ('SSN/ITIN') remained the same.

~~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 with ITIN**

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A0391",       "fdidType": "ACCOUNT",       "accountType": ["<del>BROKERAGE</del>OTHER"],       "accountName": "MARY'S ACCT",       "branchOfficeCRD": 12345,       "fdidDate": 20120129,       "<u>clearingBrokerID": ["1234"],</u>       "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": ["<del>BROKERAGE</del>OTHER"],       "accountName": "MARY'S OTHER ACCT",       "fdidDate": 20150916,       "<u>clearingBrokerID": ["1234"],</u>       "addressList": [         {           "addrType": "ADDRESS1", </pre>

File	Data
	<pre> "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": [<del>"BROKERAGEOTHER"</del>], "accountName": "MARY'S THIRD ACCT", "fdidDate": 20190613, <del>"clearingBrokerID": ["1234"],</del> "addressList": [ { "addrType": "ADDRESS1", "addrLine1": "1 PALM COURT", "city": "TAMPA", "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": [ { </pre>

File	Data
	<pre> "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "04f1772c416e037c0c0be238a5245110675bb7c92e58d95e4dfe9cc503246edd" } ] } </pre>

### Updating ResSubmission with SSN

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/Industry Member must report the Customer to CAIS with the new Input Identifier using the Customer's SSN.

In the CAIS Data file, the Industry Member must include (1) a record for the Customer being replaced including a *roleEndDate* and *roleEndReason* of 'REPLACED' in the *fdidCustomerList* (these attributes indicate the previous Customer Record is no longer associated to the FDID); and (2) a record for the replacing Customer with the *roleStartDate*. In this example, the Customer's *role* did not change when the Input Identifier changed, so the *roleStartDate* must be the original date the Customer entered into the *role* of 'TRDHOLDER'.

In the TIDs file, the Industry Member must include (1) the *customerRecordID* with the previous *tidType* and *tidValue*; the new TID *Value* in the *replacedByTID* attribute; and the new TID Type in the *replacedByTIDType* attribute fields to indicate the customer's Input Identifier has changed, resulting in a new TID *tidValue*; and (2) the *customerRecordID* with the new *tidType* and new *tidValue*. 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": ["<del>BROKERAGE</del>OTHER"], "accountName": "MARY'S ACCT", "branchOfficeCRD": 12345, "fdidDate": 20120129, </pre>

File	Data
	<pre> "clearingBrokerID": ["1234"], "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": <del>20120129</del>20220831   } ] }, { "fdidRecordID": 2, "firmDesignatedID": "1A0395", "fdidType": "ACCOUNT", "accountType": [<del>BROKERAGE</del>OTHER], "accountName": "MARY'S OTHER ACCT", "fdidDate": 20150916, "clearingBrokerID": ["1234"], "addressList": [   {     "addrType": "ADDRESS1",     "addrLine1": "1 PALM COURT",     "city": "TAMPA",     "regionCode": "US-FL",     "countryCode": "US",     "postalCode": "33601"   } ], "fdidCustomerList": [   {     "customerRecordID": 2,     "role": "TRDHOLDER",     "roleStartDate": 20150916   } ] }, { "fdidRecordID": 3, "firmDesignatedID": "1A0397", </pre>



File	Data
	<pre> "fdidType": "ACCOUNT", "accountType": ["<del>BROKERAGE</del>OTHER"], "accountName": "MARY'S THIRD ACCT", "fdidDate": 20190613, "clearingBrokerID": ["1234"], "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",     "replacedByTID": "ecacfee4fb716eb7817e96288ccdfdf03ed7c85b1f4ba3052fe44dbd158195a",     "replacedByTIDType": "SSN/ITIN"   },   {     "customerRecordID": 2,     "tidType": "SSN/ITIN", </pre>

File	Data
	<pre> "tidValue": " ecacfeeee4fb716eb7817e96288ccdfdf03ed7c85b1f4ba3052fe44dbd158195a" } ] } </pre>

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

This scenario illustrates the CAT reporting requirements when the Input Identifier that an Industry Member previously used to generate a Customer’s TID was legally changed and the type of Input Identifier used to generate the TID value (*tidType*) changed as well. If the Customer is associated to more than one FDID at the Industry Member, the Industry Member must update the TID on all FDIDs that the Customer is associated to. In addition, the Industry Member must explicitly end the Customer’s previous *role* by including a *roleEndDate* and *roleEndReason* of ‘REPLACED’. When replacing a TID due to a legal change in Input Identifier, it is not permissible to omit the Customer’s previous *role*.

~~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 to CAIS with an LEI as the Input Identifier. However, the Legal Entity has expanded to the U.S., and has obtained an EIN and notified the Industry Member of its EIN. Since a U.S.-assigned Input Identifier is available for this CAT Customer. The CAT Reporter Industry Member 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.~~

In the CAIS Data file, the Industry Member must include (1) a record for the Customer being replaced including a *roleEndDate* and *roleEndReason* of ‘REPLACED’ in the *fdidCustomerList* (these attributes indicate the previous Customer Record is no longer associated to the FDID); and (2) a record for the replacing Customer with the *roleStartDate*. In this example, the Customer’s *role* did not change when the Input Identifier changed, so the *roleStartDate* must be original date the Customer entered into the *role* of ‘TRDHOLDER’.

In the TIDs file, the Industry Member must include (1) the *customerRecordID* with the previous *tidType*, *foreignTIDType* and *tidValue*; the new TID Value in the *replacedByTID* attribute; and the new TID Type in the *replacedByTIDType* attribute; and (2) the *customerRecordID* with the new *tidType* and new *tidValue*.

#### Updating Submission with EIN

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A1839",       "fdidType": "ACCOUNT",       "accountType": ["<del>BROKERAGE</del>OTHER"],       "accountName": "FOREIGN ACCT",       "branchOfficeCRD": 12345,       "fdidDate": 20050712,       "<u>clearingBrokerID": ["1234"],</u>       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "PRIVADA CALLE 1",           "city": "CHIHUAHUA",           "regionCode": "CHIHUAHUA",           "countryCode": "MX",           "postalCode": "31000"         }       ],       "fdidCustomerList": [         {           "customerRecordID": 1,           "role": "TRDHOLDER",           "roleStartDate": 20050712,           "roleEndDate": 20220831,           "roleEndReason": "REPLACED"         },         {           "customerRecordID": 2,           "role": "TRDHOLDER",           "roleStartDate": <del>20050712</del><u>20220831</u>         }       ]     }   ],   "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": [ </pre>

File	Data
	<pre> {   "customerRecordID": 1,   "tidType": "FOREIGN",   "foreignTIDType": "LEI",   <del>"foreignTIDCountryCd": "MX",</del>   "tidValue": "9eala76e5e52ae60e89912f66225e54c7da42e79791d5637822b69c75a210d83",   "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": [   <del>{</del> <del>  "fdidRecordID": 1,</del> <del>  "firmDesignatedID": "IA0867",</del> <del>  "fdidType": "ACCOUNT",</del> <del>  "accountType": ["BROKERAGE"],</del> <del>  "accountName": "Bridge Corp",</del> <del>  "fdidDate": 20120520,</del> <del>  "addressList": [</del> <del>    {</del> <del>      "addrType": "ADDRESS1",</del> <del>      "addrLine1": "5 MAPLE AVE",</del> <del>      "city": "AUSTIN",</del> <del>      "regionCode": "US-TX",</del> <del>      "countryCode": "US",</del> <del>      "postalCode": "73301"</del> </pre>

File	Data
	<pre> } }, "fdidCustomerList":-[   {     "customerRecordID": 1,     "role": "TRDHOLDER",     "roleStartDate": 20120520   } ] }, "legalEntityCustomerList":-[   {     "customerRecordID": 1,     "legalName": "Bridge Corp",     "ein": "00-1987445",     "customerType": ["NOTAPPLICABLE"]   } ] } } </pre>
TIDS	<pre> {   "tidRecordList":-[     {       "customerRecordID": 1,       "tidType": "EIN",       "tidValue":       "33e1420dffe371e105e0a469e3566e0ee9b45dde26a93ae238b2a7db4e624928"     }   ] } } </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"         }       ]     }   ] } </pre>



File	Data
	<pre> "addressList": [   {     "addrType": "ADDRESS1",     "addrLine1": "5 MAPLE AVE",     "city": "AUSTIN",     "regionCode": "US-TX",     "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>

### **Updating Submission**

The Industry Member must report the Customer to CAIS with the new Input Identifier. Since an EIN was used to generate the TID, the Industry Member must populate the EIN in plain text in the *ein* field.

In addition, in the CAIS Data file, the Industry Member must include a record for the replacing Customer with the *roleStartDate*. In this example, the Customer's *role* did not change when the Input Identifier changed, so the *roleStartDate* must be the original date the Customer entered into the *role* of 'TRDHOLDER'. In addition, the Industry Member must explicitly end the Customer's previous *role* by including a *roleEndDate* and *roleEndReason* of 'REPLACED'. When replacing a TID due to a legal

change in Input Identifier, it is not permissible to omit the Customer's previous *role* and the *roleEndDate* and *roleEndReason* must be populated.

In the TIDs file, the Industry Member must include (1) the *customerRecordID* with the previous *tidType* and *tidValue*; the new TID Value in the *replacedByTID* attribute; and the new TID Type in the *replacedByTIDType* attribute; and (2) the *customerRecordID* with the new *tidType* and new *tidValue*.

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "IA0019",       "fdidType": "ACCOUNT",       "accountType": ["OTHER"],       "accountName": "Bkr Acct 19",       "fdidDate": 20190502,       "clearingBrokerID": ["1234"],       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "5 MAPLE AVE",           "city": "AUSTIN",           "regionCode": "US-TX",           "countryCode": "US",           "postalCode": "73301"         }       ],       "fdidCustomerList": [         {           "customerRecordID": 1,           "role": "TRDHOLDER",           "roleStartDate": 20190502,           "roleEndDate": 20220712,           "roleEndReason": "REPLACED"         }       ]     }   ],   "legalEntityCustomerList": [     {       "customerRecordID": 1,       "legalName": "ABC Corporation",       "ein": "00-3583529",       "customerType": ["NOTAPPLICABLE"],     },     {       "customerRecordID": 2,       "legalName": "ABC Corporation",       "ein": "00-4577325",       "customerType": ["NOTAPPLICABLE"],     }   ] } </pre>



File	Data
	<pre>] }</pre>
TIDs	<pre>{   "tidRecordList": [     {       "customerRecordID": 1,       "tidType": "EIN",       "tidValue": "fffb84a69fcb89a4a5d07584a0d1bec5ee6ec4e258d5a1410d37277ec1130b785",       "replacedByTIDType": "EIN",       "replacedByTID": "4c8f21e1d71b0d1520858ea4903a2212d82f8f3d2cf8f1beccc059388e3d3087"     },     {       "customerRecordID": 2,       "tidType": "EIN",       "tidValue": "4c8f21e1d71b0d1520858ea4903a2212d82f8f3d2cf8f1beccc059388e3d3087"     }   ] }</pre>

### 3.5. Multiple Versions of a Customer Within a Submission File

It is acceptable to report all FDID Records within a single submission in association with a single *customerRecordID* value 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. Alternatively, it is acceptable to report the same CAT Customer with multiple *customerRecordID* values, each with an association to one or more FDID Records. 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 once for each *customerRecordID*. No matter which alternative the Industry Member chooses, each version of the CAT Customer 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 the table titled "Customer Data Inconsistencies" in the CAT Reporting Customer and Account Information Technical Specifications for Industry Members-Full CAIS. The data stored in CAIS will consist of the merged set of entries across the submitted versions of the Customer.

~~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. Multiple Firm Owned Accounts Demonstrating Customer Record Optionality**

~~This scenario illustrates the CAT reporting requirements when an Industry Member 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 Industry Member. The Industry Member is not required to report its employees as Authorized Traders on the accounts.~~

#### **Option 1 - Same customerRecordID**

~~It is acceptable to report all of the accounts in association with a single *customerRecordID* value within the *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.~~

~~In this example, the Industry Member reports three FDIDs, each with an association to the single *customerRecordID* value.~~

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A9574",       "fdidType": "ACCOUNT",       "accountType": ["FIRM"],       "accountName": "PropAcct1",       "fdidDate": 20050821,       "clearingBrokerID": ["1234"],       "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         }       ]     }   ] }</pre>

File	Data
	<pre> } ], "fdidCustomerList": [ { "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20050821 } ], }, { "fdidRecordID": 2, "firmDesignatedID": "1A3016", "fdidType": "ACCOUNT", "accountType": ["FIRM", "MARKET"], "accountName": "MrktMkr", "fdidDate": 20120301, "clearingBrokerID": ["1234"], "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 } ], "fdidCustomerList": [ { "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20120301 } ], }, { "fdidRecordID": 3, "firmDesignatedID": "1A4496", "fdidType": "ACCOUNT", "accountType": ["FIRM"], "accountName": "AnotherFirmAccount", "fdidDate": 20191201, "clearingBrokerID": ["1234"], "addressList": [ { "addrType": "ADDRESS1", "addrLine1": "1 WATERS ST", </pre>

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

**Option 2 - Different customerRecordIDs**

Option 2 is an alternative reporting approach to Option 1, above.

In Option 2, 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 once for each *customerRecordID*. The below example has 3 FDIDs with three different *customerRecordID* values.

It is not permissible for the Industry Member to populate different values for the *ein* or else all versions of the Customer within the file will reject.

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A3175",       "fdidType": "ACCOUNT",       "accountType": ["FIRM"],       "accountName": "PropAcct1",       "fdidDate": 20050821,       "clearingBrokerID": ["1234"],       "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         }       ]     },     {       "fdidCustomerList": [         {           "customerRecordID": 1,           "role": "TRDHOLDER",           "roleStartDate": 20050821         }       ]     }   ],   {     "fdidRecordID": 2,     "firmDesignatedID": "1A0059",     "fdidType": "ACCOUNT",     "accountType": ["FIRM", "MARKET"],     "accountName": "MrktMkr",     "fdidDate": 20120301,</pre>

File	Data
	<pre> "clearingBrokerID": ["1234"], "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,   "clearingBrokerID": ["1234"],   "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, </pre>

File	Data
	<pre> "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": [ { "customerRecordID": 1, "tidType": "EIN", "tidValue": "dc7232533673aa251694afab7091cf4e7ecb885fd80cef91df442dba855bb" }, { "customerRecordID": 35, "tidType": "EIN", "tidValue": "dc7232533673aa251694afab7091cf4e7ecb885fd80cef91df442dba855bb" }, { "customerRecordID": 50, "tidType": "EIN", "tidValue": </pre>

File	Data
	"dc7232533673aa251694afab7091cf4e7ecb885fd80cefeff91df442dba855bb" } ] }

### 3.5.4.3.5.2. Multiple Versions of Natural Person Customer with Multiple Customer Records

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 Industry Member is submitting two versions of a single Natural Person Customer, associated to three different FDIDs. The Industry Member is permitted to associated *customerRecordID* '1' to *fdidRecordID* '1' and *fdidRecordID* '2' because the values in the Customer Record (*firstName*, *middleName*, *lastName*, *yearOfBirth*, *customerType* and Customer address) are the same. However, the Industry Member must create and report a different *customerRecordID* ('2', in this example) for *fdidRecordID* '3' because it is owned by a trust that conducts business under a name other than the Natural Person's legal name. In such scenarios, the *doingBusinessAs* attribute must be present and populated in the Customer Record. 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	{ "fdidRecordList": [ { "fdidRecordID": 1, "firmDesignatedID": "1A4041", "fdidType": "ACCOUNT", "accountType": [" <del>BROKERAGE</del> OTHER"], "accountName": "JimsTrdngAcct", "branchOfficeCRD": 12345, "fdidDate": 20140624, "clearingBrokerID": ["1234"], "addressList": [ { "addrType": "ADDRESS1", "addrLine1": "999 South 1st Circle", "city": "Trenton", "regionCode": "US-NJ", "countryCode": "US", "postalCode": "08616" } ], "fdidCustomerList": [ { "customerRecordID": 1, "role": "TRDHOLDER",



File	Data
	<pre> "roleStartDate": 20140624     }   ] }, {   "fdidRecordID": 2,   "firmDesignatedID": "1A8961",   "fdidType": "ACCOUNT",   "accountType": [<del>"BROKERAGE</del>"OTHER"],   "accountName": "JimsTrdngAcct2",   "clearingBrokerID": ["1234"],   "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": [<del>"TRUST</del>"OTHER"],   "accountName": "JAMES WILLIAMS LIVING TRUST",   "fdidDate": 20160920,   "clearingBrokerID": ["1234"],   "addressList": [     {       "addrType": "ADDRESS1",       "addrLine1": "999 South 1st Circle",       "city": " Trenton",       "regionCode": "US-NJ",       "countryCode": "US",       "postalCode": "08616"     }   ],   "fdidCustomerList": [     {       "customerRecordID": 2,       "role": "TRDHOLDER",       "roleStartDate": 20160920     }   ] } </pre>

File	Data
	<pre> ] } ], "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",         "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>

File	Data
	<pre> ] } ] } </pre>
TIDs	<pre> {   "tidRecordList": [     {       "customerRecordID": 1,       "tidType": "SSN/ITIN",       "tidValue": "360ae6aeb548ab78ffcb9032ac5213ec74d0017c229078fdca586b663d20d13e"     },     {       "customerRecordID": 2,       "tidType": "SSN/ITIN",       "tidValue": "360ae6aeb548ab78ffcb9032ac5213ec74d0017c229078fdca586b663d20d13e"     }   ] } </pre>

### **3.5.2.3.5.3. Multiple Versions of Legal Entity Customer with Multiple Customer Records**

This scenario illustrates the CAT reporting requirements ~~in the event that~~when a CAT Reporter an Industry Member firm has multiple versions of a single Legal Entity Customer.

In this example, the ~~CAT Reporter~~Industry Member firm is submitting three versions of a single Legal Entity Customer, each version associated to ~~three~~a 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": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A3310",       "fdidType": "ACCOUNT",       "accountType": ["<del>BROKERAGE</del>OTHER"],       "accountName": "First LE Account",       "branchOfficeCRD": 12345,       "fdidDate": 20070802,       "<del>clearingBrokerID</del>": ["1234"],       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "10 NORTH PALM ST.", </pre>

File	Data
	<pre> "city": "NAPLES", "regionCode": "US-FL", "countryCode": "US", "postalCode": "34102" } ], "fdidCustomerList": [ { "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20070802 } ] }, { "fdidRecordID": 2, "firmDesignatedID": "IA3311", "fdidType": "ACCOUNT", "accountType": ["<del>BROKERAGE</del>OTHER"], "accountName": "Second LE Account", "branchOfficeCRD": 12345, "fdidDate": 20140920, "clearingBrokerID": ["1234"], "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", "fdidType": "ACCOUNT", "accountType": ["DVP/RVP", "<del>BROKERAGE</del>"], "primeBrokerIDDVPCustodianID": ["<del>BRK19999</del>"], "accountName": "Third LE Account", "branchOfficeCRD": 99999, "fdidDate": 20110106, "clearingBrokerID": ["1234"], "addressList": [ { "addrType": "ADDRESS1", "addrLine1": "10 PINEAPPLE PL", </pre>

File	Data
	<pre> "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", "customerType": ["BD"], "lei": "88372RGFK892W105VM33", "addressList": [ { "addrType": "ADDRESS1", "addrLine1": "5000 SPRING WAY ", "city": "PITTSBURGH", "regionCode": "US-PA", "countryCode": "US", "postalCode": "15106" } ] } ] </pre>

File	Data
	<pre> } ] }, {   "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": " e860f1dlca4c1e7de86468752dba08f69143522bf245dd3f8377286f920c4308"     },     {       "customerRecordID": 2,       "tidType": "EIN",       "tidValue": " e860f1dlca4c1e7de86468752dba08f69143522bf245dd3f8377286f920c4308"     },     {       "customerRecordID": 3,       "tidType": "EIN", </pre>

File	Data
	<pre> "tidValue": "e860f1d1ca4c1e7de86468752dba08f69143522bf245dd3f8377286f920c4308" } ] } </pre>

### 3.5.3.3.5.4. Correcting/Repairing 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 ~~e~~Customer are submitted within the same file, but one version is rejected. In that scenario, all versions of the Customer with the file, as reconciled to a single tidValue, will reject.

~~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 example, the legalName attribute is not present or populated for customerRecordID '1'. Because legalName is a required attribute for Legal Entity CAT Customers, this In this instance, version of the CAT Customer is rejected with Error Code 22530 (Missing or Invalid legalName). In addition, within the file, all other versions of the Ccustomer (regardless of FDID associations) within the same file will be rejected with Error Code 22529 (Customer Record rejected because another version of the Customer was rejected). All FDID Records associated to the rejected Customer Records will reject with Error Code 22048 (Associated Customer Record rejected. In order to resolve all rejections, the CAT Reporter firm must rResolvinge the original Customer Record rejection will resolve all other related rejections.~~

~~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. It is permissible for the Industry Member to populate the legalName attribute with different values for different versions of the same Legal Entity CAT Customer. However, it is not permissible for the Industry Member to populate different values for the ein or else all versions of the Customer within the file will reject. Subsequent versions of the same customer are rejected with error code 22529.~~

#### Original Submission with Error

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A5971",       "fdidType": "ACCOUNT",       "accountType": ["<del>BROKERAGE</del>OTHER"],       "accountName": "First LE Account", </pre>

File	Data
	<pre> "fdidDate": 20070802, "clearingBrokerID": ["1234"], "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": ["<del>BROKERAGE</del>OTHER"],   "accountName": "Second LE Account",   "fdidDate": 20140920,   "clearingBrokerID": ["1234"],   "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", "<del>BROKERAGE</del>"],   "primeBrokerIDDVPCustodianID": ["8888BRK1"],   "accountName": "Third LE Account",   "fdidDate": 20110106,   "clearingBrokerID": ["1234"], </pre>



File	Data
	<pre> "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,     "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, </pre>

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

### Correcting/Repairing Submission

File	Data
Data	<pre> { "fdidRecordList": [ { "fdidRecordID": 1, "firmDesignatedID": "1A5971", "fdidType": "ACCOUNT", "accountType": ["<del>BROKERAGE</del>OTHER"], "accountName": "First LE Account", "fdidDate": 20070802, "<u>clearingBrokerID": ["1234"],</u> "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": ["<del>BROKERAGE</del>OTHER"], "accountName": "Second LE Account", "fdidDate": 20140920, "<u>clearingBrokerID": ["1234"],</u> "addressList": [ { "addrType": "ADDRESS1", "addrLine1": "5000 SPRING WAY", "city": "PITTSBURGH", "regionCode": "US-PA", "countryCode": "US", </pre>

File	Data
	<pre>         "postalCode": "15106"       }     ],     "fdidCustomerList": [       {         "customerRecordID": 2,         "role": "TRDHOLDER",         "roleStartDate": 20140920       }     ]   },   {     "fdidRecordID": 3,     "firmDesignatedID": "IA3087",     "fdidType": "ACCOUNT",     "accountType": ["DVP/RVP", "<del>"BROKERAGE"</del>"],     "<del>"primeBrokerID"</del><u>"DVPCustodianID"</u>: [<u>"BRK18888"</u>],     "accountName": "Third LE Account",     "fdidDate": 20110106,     "<u>"clearingBrokerID"</u>: [<u>"1234"</u>],     "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.", </pre>

File	Data
	<pre> "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>

### **3.5.5. Repairing a Customer Record Rejection Due to the FDID being Rejected**

This scenario illustrates the CAT reporting requirements when a CAT Customer Record is rejected because the FDID(s) it was associated to rejected.

In this example, the FDID Record is rejected because a required attribute, *fdidDate*, is not present or populated. This results in a rejection with Error Code 22007 (Missing or Invalid format of *fdidDate*). The associated Customer Record is also rejected because the FDID Record was rejected. This results in Error Code 22523 (Customer Record rejected because an associated FDID was rejected). Resolving the FDID Record rejection will resolve the rejection for Error Code 22523.

#### **Original Submission with Error**

File	Data
Data	<pre> { "fdidRecordList": [ _____ { _____ "fdidRecordID": 1, _____ "firmDesignatedID": "IA1118", _____ "fdidType": "ACCOUNT", _____ "accountType": ["OTHER"], _____ "accountName": "ABC Corp", _____ } ] } </pre>

File	Data
	<pre> "clearingBrokerID": ["1234"], "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": "ABC Corp",     "ein": "00-3057412",     "customerType": ["NOTAPPLICABLE"]   } ] } </pre>
TIDs	<pre> { "tidRecordList": [   {     "customerRecordID": 1,     "tidType": "EIN",     "tidValue": "78668117ae015072dd194c0bca1fb0a919cfe1b29c8bc963e497354a706a8e1e"   } ] } </pre>

### Repairing Submission

File	Data
Data	<pre> { "fdidRecordList": [   {     "fdidRecordID": 1,     "firmDesignatedID": "IA1118",     "fdidType": "ACCOUNT",     "accountType": ["OTHER"],     "accountName": "ABC Corp",     "fdidDate": 20120520,     "clearingBrokerID": ["1234"], </pre>

File	Data
	<pre> "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": "ABC Corp",     "ein": "00-3057412",     "customerType": ["NOTAPPLICABLE"]   } ] } </pre>
TIDs	<pre> { "tidRecordList": [   {     "customerRecordID": 1,     "tidType": "EIN",     "tidValue": "78668117ae015072dd194c0bca1fb0a919cfe1b29c8bc963e497354a706a8e1e"   } ] } </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- Full CAIS](#) 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 an [CAT Reporter Industry Member 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 Industry Member Firm](#). The [CAT Reporter Industry Member 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 Industry Member Firm](#) is not required to report [their](#) employees as Authorized Traders on the account.

[For purposes of](#) this example, the [CAT Reporter Industry Member firm](#) only stores the [a](#)Address for the FDID Record, and as such no [a](#)Address is reported on the [\\_CAT](#) Customer Record. The *customerType* is [populated with](#) set as 'BD', since the [CAT Reporter Industry Member firm](#) is a US registered Broker/Dealer. The [CAT Reporter Industry Member 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,       "<del>"clearingBrokerID": ["1234"],</del>"       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "1 WATERS ST",           "city": "JERSEY CITY",           "regionCode": "US-NJ",           "countryCode": "US",           "postalCode": "07097"         }       ],       "largeTraderList": [         {</pre>

File	Data
	<pre>                 "largeTraderRecordID": 1,                 "largeTraderID": "00000000-0001",                 "ltidEffectiveDate": 20150101             }         ],         "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": [     {       "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",     }   ] } </pre>

File	Data
	<pre> <del> "ltidEffectiveDate": 20150101 } }, "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, </del> </pre>

File	Data
	<pre> ----- "legalName": "CAT Reporter Firm Name", "ein": "00 9727341", "customerType": ["BD"], "lei": "L49S8SWR48C4MFGH8ZH1" ----- } + + </pre>
TIDs	<pre> { "tidRecordList": [ ----- { "customerRecordID": 1, "tidType": "EIN", "tidValue": "dc7232533673aa251694afab7091ef4c7ecb885fd80cefeff91df442dba855bb" ----- } + + </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": [ ----- { </pre>

File	Data
	<pre> <del> "largeTraderRecordID": 1, "largeTraderID": "10101010-1111", "ltidEffectiveDate": 20150101 } } "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", </del> </pre>

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

File	Data
TIDS	<pre> {   "tidRecordList": [     {       "customerRecordID": 1,       "tidType": "EIN",       "tidValue": "de7232533673aa251694afab7091ef4e7ecb885fd80cefeff91df442dba855bb"     },     {       "customerRecordID": 35,       "tidType": "EIN",       "tidValue": "de7232533673aa251694afab7091ef4e7ecb885fd80cefeff91df442dba855bb"     },     {       "customerRecordID": 50,       "tidType": "EIN",       "tidValue": "de7232533673aa251694afab7091ef4e7ecb885fd80cefeff91df442dba855bb"     }   ] } </pre>

#### 4.1.2. ~~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 Industry Member Firm~~. The Industry Member is not required to report its employees as Authorized Traders on the account.

Since this is a firm owned average price account, the *accountType* must include 'AVERAGE'. The ~~CAT Reporter Industry Member 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,       "clearingBrokerID": ["1234"],       "addressList": [         {           "addrType": "ADDRESS1", </pre>

File	Data
	<pre>                 "addrLine1": "123 MAIN ST.",                 "city": "SAN FRANCISCO",                 "regionCode": "US-CA",                 "countryCode": "US",                 "postalCode": "94016"             }         ],         "fdidCustomerList": [             {                 "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 reporting CAT Reporter Firm/Industry Member 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 account holder who also has authorization to trade on the Account. ~~The CAT Customer has rights to trade in their account~~ and is reported with a *role* of 'TRDHOLDER'. The *accountType* must include 'RETIREMENT'.

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 2000,       "firmDesignatedID": "1A25978",       "fdidType": "ACCOUNT",       "accountType": ["RETIREMENT", "<del>"BROKERAGE"</del>],       "accountName": "Joseph's Retirement Account",       "fdidDate": 20210115,       "<del>"clearingBrokerID": ["1234"],</del>       "addressList": [         {           "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, </pre>



File	Data
	<pre> "tidType": "SSN/ITIN", "tidValue": "7d428d1e6f7ddf14973c2c0df79ccc87912322c68ca500f29b27cf5bee487ed5" } ] } </pre>

#### 4.2.2. Account Holder and ~~CAT Reporter Firm~~ Industry Member as Authorized Trader ~~Who is an Employee~~

This scenario illustrates the CAT reporting requirements when the account reported to CAIS has two Customers: ~~both an account holder and an Authorized Trader who is not a holder of the Account, an authorized trader on the account,~~

In this example, ~~where the Industry Member is an Authorized T~~ ~~trader on the account is an employee of the firm and has who has authority to place orders for the Account without prior approval of the account holder 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 account holder and the Authorized Trader Industry Member are reported in association to~~ must be reported as CAT Customers on the FDID Record.

In this example, the Industry Member itself is the Authorized Trader and the account holder has not specifically designated any natural person employees of the Industry Member as authorized to trade for the account independent of the authority granted to the entity authorized trader. 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. In this example, the Industry Member must be identified in a role of 'AUTHREP' and *hasDiscretion* must be 'true'. In addition, *customerType* must include 'BD'.

For contrast, see Scenario 4.2.3: Account with Specifically Designated Industry Member Employee Broker as Authorized Trader.

File	Data
Data	<pre> { "fdidRecordList": [ { "fdidRecordID": 5000, "firmDesignatedID": "1A25978", "fdidType": "ACCOUNT", "accountType": [<del>"ADVISED"</del>, "RETIREMENT", <del>"BROKERAGE"</del>], "accountName": "Advised Retirement Acct", "registeredRepCRD": ["99999"], "branchOfficeCRD": 77777, "fdidDate": 20210115, <del>"clearingBrokerID": ["1234"]</del>, "addressList": [ </pre>

File	Data
	<pre>         {           "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": "AUTHREPR3RD",           "hasDiscretion": true,           "roleStartDate": 20210115         }       ]     },     "naturalPersonCustomerList": [       {         "customerRecordID": 72,         "firstName": "JOSEPH",         "middleName": "WALTER",         "lastName": "SMYTHE",         "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": "47471430482258447580bb291a2ba29c79483f09000f25fccfd3bead7f46e0"     }, <del>     {       "customerRecordID": 415,</del> </pre>

File	Data
	<pre> <del>      "tidType": "SSN/ITIN",</del> <del>      "tidValue":</del> <del>      "06ccc97f329281e67b8c321bbe6f8630b346ee8e80356a34196352abd49ef67c"</del> <del>    },</del>     {       "customerRecordID": 589,       "tidType": "EIN",       "tidValue":       "c30ef117db387710cdd88ebca6887a7d2356ee40e0df29e04cc3ba6ae2facf92"     }   ] }</pre>

#### 4.2.3. Account with Specifically Designated Industry Member Employee Broker as Authorized Trader

This scenario illustrates the CAT reporting requirements when an employee of the Industry Member is an Authorized Trader who is not a holder of the Account but does have authority to place orders for the Account without prior approval of the account holder(s) and the account holder specifically designated the natural person employee as authorized to trade for the account independent of the authority granted to the entity authorized trader. See FAQ Q56 for more information.

In this example, the account holder specifically designated John Palmer, a natural person and employee of the Industry Member, as authorized to trade for the account independent of any authority that may be granted to the Industry Member entity itself. The Industry Member must identify John Palmer as a CAT Customer in the role of 'AUTHREP' with a customerType of 'EMPLOYEE'.

Since the Industry Member itself is not an authorized trader on the account, the Industry Member is not a CAT Customer for this account. For contrast, see Scenario 4.2.2: Account Holder and Industry Member as Authorized Trader.

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 2000,       "firmDesignatedID": "1A0973",       "fdidType": "ACCOUNT",       "accountType": ["OTHER"],       "accountName": "Acct12345",       "fdidDate": 20050926,       "clearingBrokerID": ["1234"],       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "415 MAIN BOULEVARD",           "city": "CHICAGO",           "regionCode": "US-IL",           "countryCode": "US", </pre>

File	Data
	<pre> "postalCode": "60176" } ], "fdidCustomerList": [ { "customerRecordID": 40, "role": "TRDHOLDER", "roleStartDate": 20050926 }, { "customerRecordID": 41, "role": "AUTHREP", "hasDiscretion": true, "roleStartDate": 20050926 } ] } ], "naturalPersonCustomerList": [ { "customerRecordID": 40, "firstName": "Marie", "lastName": "Miller", "yearOfBirth": 1967, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 41, "firstName": "John", "lastName": "Palmer", "yearOfBirth": 1959, "customerType": ["EMPLOYEE"] } ] } </pre>
TIDs	<pre> { "tidRecordList": [ { "customerRecordID": 40, "tidType": "SSN/ITIN", "tidValue": "6a36505e1b5bfb49dc7f2d3c978d83e03945e7bc8e82b9d6d5a2334d18a164b4" }, { "customerRecordID": 41, "tidType": "SSN/ITIN", "tidValue": "d1e57d9fdea716fbd204515d547f9c71216ee614c16838436dd25429c4b9a555" } ] } </pre>

#### 4.2.3.4.2.4. 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. The~~ *fdidType* must be populated with 'RELATIONSHIP', the *accountType* must include 'RELATIONSHIP' and the *role* of the associated Customer(s) must be 'TRDHOLDER'.

In this ~~examplescenario~~, the ~~CAT Reporter Firm Industry Member may does~~ 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~~ The only CAT Customer is the fund manager, and therefore has no additional account holders or Authorized Traders for reporting to CAT. The fund manager has not designated any other authorized traders for the account. -

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 224,       "firmDesignatedID": "1A4949",       "fdidType": "RELATIONSHIP",       "accountType": ["RELATIONSHIP"],       "accountName": "IA4949",       "branchOfficeCRD": "900221",       "fdidDate": 20210115,       "clearingBrokerID": ["1234"],       "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         }       ]     }   ], }</pre>

File	Data
	<pre>"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>

#### 4.2.4.4.2.5. DVP/RVP Account with a Clearing Number

This scenario illustrates a clearing firm's ~~the~~ CAT reporting requirements ~~from the perspective of a clearing firm~~ when the account reported to CAIS is a DVP/RVP account, where the shares are being delivered from the clearing firm- to the prime broker.

In this example, As the clearing firm is reporting an accountType of ~~includes~~ 'DVP/RVP', so the primeBrokerIDDVPCustodianID attribute must be populated with the clearing number of the prime broker. ~~Also -~~ 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", "<del>BROKERAGE</del>"],       "accountName": "PB DVP RVP ACCT. FBO INSTIT. CLIENT",       "branchOfficeCRD": 123456,       "<del>primeBrokerIDDVPCustodianID</del>": ["<del>9542</del>"],       "clearingBrokerID": ["1028"],       "fdidDate": 20210115,       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "1 WATERS ST",           "city": "JERSEY CITY", </pre>

File	Data
	<pre>                 "regionCode": "US-NJ",                 "countryCode": "US",                 "postalCode": "07097"             }         ],         "fdidCustomerList": [             {                 "customerRecordID": 1,                 "role": "NTRDHOLDER",                 "roleStartDate": 20210115             },             {                 "customerRecordID": 55,                 "role": "AUTH3RD",                 "hasDiscretion": true,                 "roleStartDate": 20210115             }         ]     },     "legalEntityCustomerList": [         {             "customerRecordID": 1,             "legalName": "Prime Broker",             "ein": "00-8803921",             "customerType": ["BD"],             "lei": "WQ930027TVN471GRQ09"         },         {             "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>

#### 4.2.5.4.2.6. DVP/RVP Account with Bank Depository ID

This scenario illustrates ~~a clearing firm's~~ the CAT reporting requirements ~~from the perspective of a clearing firm~~ when the account reported to CAIS is a DVP/RVP account, where the shares are being delivered from the clearing firm to a bank ~~custodian, which is the custodian of the account.~~

~~In this example, the clearing firm is reporting an As the accountType of includes 'DVP/RVP', so the the bankDepositoryID-DVPCustodianID attribute must be populated with the . In this example, where shares are being delivered to a non-broker dealer bank, there is only a single depository-DTC number value included within the array of the bank. 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 t~~The institutional client ~~is the holder of the Account that also has authorization to trade on the Account, that is also an authorized trader on the account.~~

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



File	Data
	<pre> "ein": "00-3187272", "customerType": ["NOTAPPLICABLE"], "lei": "L49S8SWR48C4MFGH8ZH1" } ] } </pre>
TIDs	<pre> { "tidRecordList": [ { "customerRecordID": 55, "tidType": "EIN", "tidValue": "fbbf9e01933589e830d93613149976c587a6ceddbd10a28614cb1f4b83e1b84e" } ] } </pre>

#### 4.2.6.4.2.7. UGMA/UTMA Custodied Account

This scenario illustrates the CAT reporting requirements for an UGMA/UTMA custody account with two CAT Customers- 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.

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 below illustrations do not depict all possible CAT CAIS reporting scenarios and is not intended to suggest that these are the only ways Industry Members can report UGMA/UTMA custody accounts 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-Full CAIS.

This scenario illustrated below are two options for the account structure, and five options for reporting when the minor reaches the age of majority.

#### Account Structure - Option 1

In this example, the CAT Reporter Industry Member 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", </pre>

File	Data
	<pre> "fdidType": "ACCOUNT", "accountType": ["UGMA/UTMA", <del>"BROKERAGE"</del>], "accountName": "Custodied Account", "fdidDate": 20210115, <del>"clearingBrokerID": ["1234"],</del> "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",         "countryCode": "US",         "postalCode": "60038"       }     ]   },   {     "customerRecordID": 10,     "firstName": "JOSEPH",     "middleName": "WALTER",     "lastName": "SMYTHE",     "nameSuffix": "JUNIOR", </pre>

File	Data
	<pre> "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 who is not a holder of the Account~~on the account~~, and the minor is 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", <del>"BROKERAGE"</del>],     "accountName": "Custodied Account",     "fdidDate": 20210115,     <u>"clearingBrokerID": ["1234"]</u>,     "addressList": [       {         "addrType": "ADDRESS1",         "addrLine1": "415 MAIN BOULEVARD", </pre>

File	Data
	<pre> "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", "lastName": "SMYTHE", "nameSuffix": "JUNIOR", "yearOfBirth": 2011, "customerType": ["NOTAPPLICABLE"], "addressList": [ { "addrType": "ADDRESS1", "addrLine1": "23 MAIN AVE", "city": "PALATINE", "regionCode": "US-IL", </pre>

File	Data
	<pre> "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

~~In both Option 1 and Option 2, When a minor associated to an UGMA/UTMA account reaches the age of majority, the CAT Reporter firm/Industry Member's policy is to close the UGMA/UTMA account and transfer the assets to a new brokerage account when a minor associated to an UGMA/UTMA account reaches the age of majority. In this example, t~~

~~The minor has reached the age of majority and contacted the CAT Reporter firm/Industry Member.~~

~~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/Industry Member ends the previous the FDID when the UGMA/UTMA is closed and .The firm opens a newcreates a new FDID based on the new accounton which there is only one CAT Customer. In addition, the Industry Member implicitly ends the roles on the closed FDID by omitting them from the submission.~~

File	Data
Data	<pre> { "fdidRecordList": [ { "fdidRecordID": 1, "firmDesignatedID": "1A25978", "fdidType": "ACCOUNT", "accountType": ["UGMA/UTMA", "<del>"BROKERAGE"</del>], "accountName": "Custodied Account", "fdidDate": 20210115, </pre>

File	Data
	<pre> "clearingBrokerID": ["1234"], "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": ["<u>BROKERAGEOTHER</u>"],   "accountName": "New Account",   "fdidDate": 20220815,   "clearingBrokerID": ["1234"],   "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",         "city": "PALATINE", </pre>

File	Data
	<pre> "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 both Option 1 and Option 2, the Industry Member's policy is to close the UGMA/UTMA account and transfer the assets to a new brokerage account when a minor associated to an UGMA/UTMA account reaches the age of majority.~~

~~The minor has reached the age of majority and contacted the Industry Member.~~

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 Industry Member ends the the previous FDID when the UGMA/UTMA is closed and creates a new FDID based on the new account. In addition, the Industry Member implicitly ends the roles on the closed FDID by omitting them from the submission. 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", </pre>

File	Data
	<pre> "accountType": ["UGMA/UTMA", "<del>"BROKERAGE"</del>], "accountName": "Custodied Account", "fdidDate": 20210115, <del>"clearingBrokerID": ["1234"],</del> "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": [<del>"BROKERAGEOTHER"</del>],   "accountName": "New Account",   "fdidDate": 20220815, <del>"clearingBrokerID": ["1234"],</del>   "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", </pre>



File	Data
	<pre> "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",   "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>

**Age of Majority – Option 3 and Option 4**

In Option 3 and Option 4, the Industry Member's business practice is to repurpose the same account when the minor reaches the age of majority. The Industry Member must update the *accountType* attribute from 'UGMA/UTMA' and populate this field with all applicable allowable values. Also in Option 3 and Option 4, the former custodian is no longer a CAT Customer associated to this FDID.

**Option 3- Explicitly Ending One Customer's *role* and Implicitly Ending the Other Customer's *role***

In Option 3, the Industry Member explicitly ends the former custodian's *role* by setting a *roleEndDate* and *roleEndReason*. The Industry Member also creates a new *role* for the former minor of 'TRDHOLDER'. Omitting the former minor's previous *role* of 'NTHOLDER' implicitly ends the previous *role* in CAIS.

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 2000,       "firmDesignatedID": "1A25978",       "fdidType": "ACCOUNT",       "accountType": ["OTHER"],       "accountName": "New Account",       "fdidDate": 20210115,       "clearingBrokerID": ["1234"],       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "415 MAIN BOULEVARD",           "city": "CHICAGO",           "regionCode": "US-IL",           "countryCode": "US",           "postalCode": "60176"         }       ],     },     {       "fdidCustomerList": [         {           "customerRecordID": 40,           "role": "TRDHOLDER",           "roleStartDate": 20210115,           "roleEndDate": 20210815,           "roleEndReason": "ENDED"         },         {           "customerRecordID": 10,           "role": "TRDHOLDER",           "roleStartDate": 20210815         }       ]     }   ],   "naturalPersonCustomerList": [     {       "customerRecordID": 40,       "firstName": "JOSEPH",       "middleName": "WALTER",     }   ] } </pre>

File	Data
	<pre> "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",   "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 4**

In Option 3 and Option 4, the Industry Member's business practice is to repurpose the same account when the minor reaches the age of majority. The Industry Member must update the *accountType* attribute from 'UGMA/UTMA' and populate this field with all applicable allowable values. Also in Option 3 and Option 4, the former custodian is no longer a CAT Customer associated to this FDID.

**Option 4- Implicitly Ending Both Customer's roles**

In Option 4, the Industry Member implicitly ends the former custodian's *role* by omitting it from the updating submission. The Industry Member also creates a new *role* for the former minor of 'TRDHOLDER'. Omitting the former minor's previous *role* of 'NTHOLDER' implicitly ends the previous *role* in CAIS.

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 2000,       "firmDesignatedID": "1A25978",       "fdidType": "ACCOUNT",       "accountType": ["OTHER"],       "accountName": "New Account",       "fdidDate": 20210115,       "clearingBrokerID": ["1234"],       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "415 MAIN BOULEVARD",           "addrLine2": "",           "city": "CHICAGO",           "regionCode": "US-IL",           "countryCode": "US",           "postalCode": "60176"         }       ]     },     {       "fdidCustomerList": [         {           "customerRecordID": 10,           "role": "TRDHOLDER",           "roleStartDate": 20210815         }       ]     }   ],   "naturalPersonCustomerList": [     {       "customerRecordID": 10,       "firstName": "JOSEPH",       "middleName": "WALTER",       "lastName": "SMYTHE",       "nameSuffix": "JUNIOR",       "yearOfBirth": 2011, </pre>

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

### **Age of Majority – Option 5**

In Option 5, the Industry Member's business practice is to repurpose the same account when the minor reaches the age of majority. The Industry Member must update the *accountType* attribute from 'UGMA/UTMA' and populate this field with all applicable allowable values.

In Option 5, the Industry Member explicitly ends the former minor's previous *role* by setting a *roleEndDate* and *roleEndReason* and creates a new role for the former minor of 'TRDHOLDER'. Also in Option 5, the Industry Member implicitly ends the former's custodian's role by omitting it from the submission.

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 2000,       "firmDesignatedID": "1A25978",       "fdidType": "ACCOUNT",       "accountType": ["OTHER"],       "accountName": "New Account",       "fdidDate": 20210115,       "clearingBrokerID": ["1234"],       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "415 MAIN BOULEVARD",           "city": "CHICAGO", </pre>

File	Data
	<pre> "regionCode": "US-IL", "countryCode": "US", "postalCode": "60176" } ], "fdidCustomerList": [ { "customerRecordID": 10, "role": "NTHOLDER", "roleStartDate": 20210115, "roleEndDate": 20210815, "roleEndReason": "ENDED" }, { "customerRecordID": 11, "role": "TRDHOLDER", "roleStartDate": 20210815 } ] }, "naturalPersonCustomerList": [ { "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" } ] }, { "customerRecordID": 11, "firstName": "JOSEPH", "middleName": "WALTER", "lastName": "SMYTHE", "nameSuffix": "JUNIOR", "yearOfBirth": 2011, "customerType": ["NOTAPPLICABLE"], "addressList": [ { "addrType": "ADDRESS1", "addrLine1": "23 MAIN AVE", "city": "PALATINE", "regionCode": "US-IL", </pre>

File	Data
	<pre> "countryCode": "US", "postalCode": "60038" } ] } ] } </pre>
TIDs	<pre> { "tidRecordList": [ { "customerRecordID": 10, "tidType": "SSN/ITIN", "tidValue": "18d55bf55668ecd5922288be01548d3f0bd9fa338db1dc43165ac3d560c43c44" }, { "customerRecordID": 11, "tidType": "SSN/ITIN", "tidValue": "18d55bf55668ecd5922288be01548d3f0bd9fa338db1dc43165ac3d560c43c44" } ] } </pre>

#### 4.2.7.4.2.8. Adding Holders or Authorized Traders to an Account

This scenario illustrates the CAT reporting requirements for adding ~~an account holder or authorized trader~~ another CAT Customer to an FDID. Depending on the ~~CAT Reporter firm~~ Industry Member's business practices, ~~the firm~~ it 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 was~~ previously ~~been~~ accepted by CAT CAIS with a single Customer Record. ~~In the record illustrated below, t~~ The CAT Reporter Industry Member must submits an FDID Record with all the same information that was previously accepted ed by CAT CAIS, ~~but includes a~~ and include the second Customer Record. In addition, the TIDs file now includes the TID information for the newly added Customer.

#### Updating Submission

File	Data
Data	<pre> { "fdidRecordList": [ { "fdidRecordID": 1, "firmDesignatedID": "1A7759", "fdidType": "ACCOUNT", "accountType": [<del>BROKERAGE</del>OTHER"], "accountName": "CustAcct456", </pre>

File	Data
	<pre> "fdidDate": 20190615, "clearingBrokerID": ["1234"], "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> { "tidRecordList": [   {     "customerRecordID": 1,     "tidType": "SSN/ITIN",     "tidValue": "56c4d1ee2fa66991602dc80580116d195ca362d7a0b5647fea17f3e104c97944"   },   {     "customerRecordID": 2,     "tidType": "SSN/ITIN",     "tidValue": </pre>



File	Data
	<pre>"76d983df81f129e1d917709aead1cfe9f7be02057d053d2187b12961b55d0f8c"   } ] }</pre>

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

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

In Option 2, the Industry Member reports the updated status of the closed individual account and the newly opened account within the same submission file. The Industry Member must include an *fdidEndDate* and *fdidEndReason* of 'ENDED' for the closed account. In addition, the Industry Member implicitly ends the *role* on the closed FDID by omitting it from the submission.

### Submission Includes an Update to an FDID Record and an Original Submission of an FDID Record

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A7759",       "fdidType": "ACCOUNT",       "accountType": ["<del>BROKERAGE</del>OTHER"],       "accountName": "<del>IndCust</del>Acct456",       "fdidDate": 20190615,       "<del>clearingBrokerID</del>": ["1234"],       "<del>fdidEndDate</del>": 20220815,       "<del>fdidEndReason</del>": "<del>ENDED</del>",       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "150 SW ORANGE ST",           "city": "BROOKLYN",           "regionCode": "US-NY",           "countryCode": "US",           "postalCode": "11201"         }       ],     },     {       "fdidRecordID": 2,       "firmDesignatedID": "1A7760",       "fdidType": "ACCOUNT",       "accountType": ["<del>BROKERAGE</del>OTHER"],       "accountName": "<del>JntCust</del>Acct456",       "fdidDate": 20220815,       "<del>clearingBrokerID</del>": ["1234"],       "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": <del>20190615</del>20220815 }, { "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>

### 4.3. Nullifying FDID and Customer Record Attributes

This section illustrates the CAT reporting requirements when an Industry Member has previously submitted an FDID or Customer Record to CAIS, but later needs to nullify one or more attributes of the FDID or Customer Record. Since each FDID submission to CAIS requires full FDID data, including LTID and Customer associations, omitting a Conditional or Optional attribute will nullify the attribute in the CAIS database. Additionally, including the attribute but populating it with 'null' will nullify the attribute in the CAIS database.

#### 4.3.1. Nullifying Attributes via Omission

This scenario illustrates the CAT reporting requirements when an Industry Member has previously submitted FDID and Customer Records with the *fdidEndDate*, *fdidEndReason*, *roleEndDate*, and *roleEndReason* attributes populated. The Industry Member determines the FDID was ended in error, and should remain open in CAIS.

In this example, the Industry Member resubmits the FDID and Customer Records with the *fdidEndDate*, *fdidEndReason*, *roleEndDate*, and *roleEndReason* fields omitted which will clear out the end dates and end reasons.

#### Ending Submission with End Dates and End Reasons Populated

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 2000,       "firmDesignatedID": "1A3382",       "fdidType": "ACCOUNT",       "accountType": ["OTHER"],       "accountName": "Acct1",       "fdidDate": 20160502,       "clearingBrokerID": ["1234"],       "fdidEndDate": 20220712,       "fdidEndReason": "ENDED",       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "415 MAIN BOULEVARD",           "city": "CHICAGO",           "regionCode": "US-IL",           "countryCode": "US",           "postalCode": "60176"         }       ],     },   ],   "fdidCustomerList": [     {       "customerRecordID": 40,       "role": "TRDHOLDER",       "roleStartDate": 20160502,</pre>

File	Data
	<pre> "roleEndDate": 20220712, "roleEndReason": "ENDED" } ] }, ], "naturalPersonCustomerList": [ { "customerRecordID": 40, "firstName": "Marie", "lastName": "Miller", "yearOfBirth": 1967, "customerType": ["NOTAPPLICABLE"] } ] } </pre>
TIDS	<pre> { "tidRecordList": [ { "customerRecordID": 40, "tidType": "SSN/ITIN", "tidValue": "5c9be19543351f345072b444db12964309366da9c5fc4a8348745da590477677" } ] } </pre>

### Nullifying Submission (Omitting End Dates and End Reasons)

File	Data
Data	<pre> { "fdidRecordList": [ { "fdidRecordID": 2000, "firmDesignatedID": "1A3382", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "accountName": "Acct1", "fdidDate": 20160502, "clearingBrokerID": ["1234"], "addressList": [ { "addrType": "ADDRESS1", "addrLine1": "415 MAIN BOULEVARD", "city": "CHICAGO", "regionCode": "US-IL", "countryCode": "US", "postalCode": "60176" } ] }, ], "fdidCustomerList": [ { "customerRecordID": 40, </pre>

File	Data
	<pre> "role": "TRDHOLDER", "roleStartDate": 20160502 } ] }, "naturalPersonCustomerList": [ { "customerRecordID": 40, "firstName": "Marie", "lastName": "Miller", "yearOfBirth": 1967, "customerType": ["NOTAPPLICABLE"] } ] } </pre>
TIDs	<pre> { "tidRecordList": [ { "customerRecordID": 40, "tidType": "SSN/ITIN", "tidValue": "5c9be19543351f345072b444db12964309366da9c5fc4a8348745da590477677" } ] } </pre>

#### **4.3.2. Nullifying Attributes Using 'null' Value**

This scenario illustrates the CAT reporting requirements when an Industry Member has previously submitted FDID and Customer Records with the *fdidEndDate*, *fdidEndReason*, *roleEndDate*, and *roleEndReason* attributes populated. The Industry Member determines the FDID was ended in error, and should remain open in CAIS.

In this example, the Industry Member resubmits the FDID and Customer Records with the *fdidEndDate*, *fdidEndReason*, *roleEndDate*, and *roleEndReason* attributes having a value of 'null' which will clear out the end dates and end reasons. The Industry Member must only populate the *fdidEndDate*, *fdidEndReason*, *roleEndDate*, and *roleEndReason* with a lowercase value of 'null' (without quotes). Including a value of 'NULL' (uppercase without quotes) will result in a file integrity error as 'NULL' is invalid JSON.

#### **Ending Submission with End Dates and End Reasons Populated**

File	Data
Data	<pre> { "fdidRecordList": [ { "fdidRecordID": 2000, "firmDesignatedID": "1A3382", "fdidType": "ACCOUNT", </pre>

File	Data
	<pre> "accountType": ["OTHER"], "accountName": "Acct1", "fdidDate": 20160502, "registeredRepCRD": ["999999"], "clearingBrokerID": ["1234"], "fdidEndDate": 20220712, "fdidEndReason": "ENDED", "addressList": [   {     "addrType": "ADDRESS1",     "addrLine1": "415 MAIN BOULEVARD",     "city": "CHICAGO",     "regionCode": "US-IL",     "countryCode": "US",     "postalCode": "60176"   } ], "fdidCustomerList": [   {     "customerRecordID": 40,     "role": "TRDHOLDER",     "roleStartDate": 20160502,     "roleEndDate": 20220712,     "roleEndReason": "ENDED"   } ] ], "naturalPersonCustomerList": [   {     "customerRecordID": 40,     "firstName": "Marie",     "lastName": "Miller",     "yearofBirth": 1967,     "customerType": ["NOTAPPLICABLE"]   } ] } </pre>
TIDS	<pre> {   "tidRecordList": [     {       "customerRecordID": 40,       "tidType": "SSN/ITIN",       "tidValue": "5c9be19543351f345072b444db12964309366da9c5fc4a8348745da590477677"     }   ] } </pre>

### **Nullifying Submission (with 'null' Values)**

File	Data
Data	{

File	Data
	<pre> "fdidRecordList": [   {     "fdidRecordID": 2000,     "firmDesignatedID": "1A3382",     "fdidType": "ACCOUNT",     "accountType": ["OTHER"],     "accountName": "Acct1",     "fdidDate": 20160502,     "registeredRepCRD": ["999999"],     "clearingBrokerID": ["1234"],     "fdidEndDate": null,     "fdidEndReason": null,     "addressList": [       {         "addrType": "ADDRESS1",         "addrLine1": "415 MAIN BOULEVARD",         "city": "CHICAGO",         "regionCode": "US-IL",         "countryCode": "US",         "postalCode": "60176"       }     ],     "fdidCustomerList": [       {         "customerRecordID": 40,         "role": "TRDHOLDER",         "roleStartDate": 20160502,         "roleEndDate": null,         "roleEndReason": null       }     ],     "naturalPersonCustomerList": [       {         "customerRecordID": 40,         "firstName": "Marie",         "lastName": "Miller",         "yearofBirth": 1967,         "customerType": ["NOTAPPLICABLE"]       }     ]   } ] </pre>
TIDS	<pre> {   "tidRecordList": [     {       "customerRecordID": 40,       "tidType": "SSN/ITIN",       "tidValue": "5c9be19543351f345072b444db12964309366da9c5fc4a8348745da590477677"     }   ] } </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-Full CAIS](#) 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, [including repair deadlines](#), see the [Data Inconsistency, Material Inconsistencies Procedure, Material Inconsistency Obligations for Triggering and Impacted Firm, and Notification of Customer Record Updates](#) sections of the the [CAT Reporting Customer and Account Technical Specifications for Industry Members-Full CAIS](#).

### 5.1. Material Update to Previously Submitted Customer Data

This scenario illustrates the CAT reporting requirements when [an Industry Member is proactively](#) updating a material attribute, such as [yYearO-of-Birth](#) or [einEIN](#), for a Customer Record that it previously submitted to CAIS. ~~When updating a material attribute~~ [In order to avoid generating a Material Inconsistency against Customer data that it previously submitted](#), the ~~CAT Reporter~~ [Industry Member](#) must populate the *updateNotification* field with 'true'. If the *updateNotification* is omitted or set to 'false', a ~~M~~ [material inconsistency](#) will be created that must be resolved.

In this scenario, the ~~CAT Reporter~~ [Industry Member](#) must update the [yearOfBirth](#) ~~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 [the updateNotification field is](#) 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": ["<del>BROKERAGE</del>OTHER"],       "accountName": "Customer Acct",       "fdidDate": 20150628,       "<del>clearingBrokerID</del>": ["1234"],       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "150 SW ORANGE ST",           "city": "BROOKLYN",           "regionCode": "US-NY",           "countryCode": "US",           "postalCode": "11201"         }       ]     }   ] }</pre>



File	Data
	<pre>         }       ],       "fdidCustomerList": [         {           "customerRecordID": 1,           "role": "TRDHOLDER",           "roleStartDate": 20150628         }       ]     }   ],   "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

After the original submission, the Industry Member discovers that it reported an incorrect *yearOfBirth* for Sally Miller. The Industry Member updates Sally Miller's *yearOfBirth* to '1975' and includes the *updateNotification* attribute set to 'true'.

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A0045",       "fdidType": "ACCOUNT",       "accountType": [<del>"BROKERAGEOTHER"</del>],       "accountName": "Customer Acct",       "fdidDate": 20150628,       "<u>"clearingBrokerID": ["1234"],</u>       "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": 20150628             }         ]     },     "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 an CAT Reporter/Industry Member has triggered against their own data.

In this example, the CAT Reporter/Industry Member submits an FDID with two associated Customers to CAIS. In a subsequent submission, the same CAT Reporter/Industry Member submits one of those the same Customers with a different yearOfBirth than previously submitted. The Customer Record in the subsequent submission passed data validation checks and was accepted into CAIS, but the Industry Member received an Inconsistency Code of 30002 (Inconsistent data for yearOfBirth). In the resolving submission, the CAT Reporter/Industry Member must update the yearOfBirth on the Customer Record and

include the *updateNotification* attribute set to 'true' for that Customer Record in order to resolve the Material inconsistency.

**Original Submission with Incorrect Year of Birth**

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A1422",       "fdidType": "ACCOUNT",       "accountType": ["<del>BROKERAGE</del>OTHER"],       "accountName": "CustAcct1",       "fdidDate": 20090312,       "<u>clearingBrokerID": ["1234"],</u>       "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": 1982,       "customerType": ["NOTAPPLICABLE"]     },     {       "customerRecordID": 2,       "firstName": "Marie",       "lastName": "Doe",       "yearOfBirth": 1979,       "customerType": ["NOTAPPLICABLE"]     }   ] } </pre>

File	Data
	<pre>] }</pre>
TIDs	<pre>{   "tidRecordList": [     {       "customerRecordID": 1,       "tidType": "SSN/ITIN",       "tidValue": "52f544a8c2c594d8852b84a33ac8fe9f861579d2e7dd2c31584e9098925c4065"     },     {       "customerRecordID": 2,       "tidType": "SSN/ITIN",       "tidValue": "6935ff6de288fc7db127c50fca29af514b5df2ed67ebcd935490a7b74f8f76e3"     }   ] }</pre>

### Second Submission (Triggered an Intra-Firm Material Inconsistency)

In this submission, the ~~CAT Reporter~~ Industry Member erroneously changes ~~John Doe's~~ the customer's yearOfBirth from 1982 to 1928. A Material Inconsistency is created from this submission because the yearOfBirth ~~Year of Birth~~ differs materially from the same attribute previously reported by the ~~CAT Reporter~~ Industry Member for the same Customer.

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1A1422",       "fdidType": "ACCOUNT",       "accountType": ["<del>BROKERAGE</del>OTHER"],       "accountName": "CustAcct1",       "fdidDate": 20090312,       "clearingBrokerID": ["1234"],       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "150 SW ORANGE ST",           "city": "BROOKLYN",           "regionCode": "US-NY",           "countryCode": "US",           "postalCode": "11201"         }       ],       "fdidCustomerList": [         {           "customerRecordID": 1,           "role": "TRDHOLDER", </pre>

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

### **Resolution of Material Inconsistency Resolving Submission**

In this submission, the **GAT Reporter/Industry Member** reverts the erroneous *yearOfBirth* value back to its correct value of '1982'. The **GAT Reporter/Industry Member** must include an *updateNotification* attribute set to 'true' for this Customer in order to resolve the **M**aterial **I**nconsistency.

File	Data
Data	{

File	Data
	<pre> "fdidRecordList": [   {     "fdidRecordID": 1,     "firmDesignatedID": "1A1422",     "fdidType": "ACCOUNT",     "accountType": ["<del>BROKERAGE</del>OTHER"],     "accountName": "CustAcct1",     "fdidDate": 20090312,     "<del>clearingBrokerID": ["1234"],</del>     "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": 1982,     "customerType": ["NOTAPPLICABLE"],     "updateNotification": true   },   {     "customerRecordID": <del>1</del>2,     "firstName": "Marie",     "lastName": "Doe",     "yearOfBirth": 1979,     "customerType": ["NOTAPPLICABLE"]   } ] } </pre>
TIDs	<pre> {   "tidRecordList": [     {       "customerRecordID": 1, </pre>

File	Data
	<pre> "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/Industry Member whose submission data is materially inconsistent when compared to the data currently stored in CAIS (whether the currently stored data was entered by the same CAT Reporter/Industry Member or another CAT Reporter/Industry Member) is referred to as the “Triggering Firm”. The CAT Reporter/Industry Member 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/Industry Member, is referred to as the “Impacted Firm”.

#### Original Submission by Impacted Firm

In this submission example, the Impacted Firm submits an FDID Record with two associated Customers, Marie Doe and Bob Doe. is the firstThe Impacted Firm CAT Reporter is the first to have submitted a Customer Record for Marie Doe with this customer. The Reporter includes a yearOfBirth of ‘1979’ for this customer. The Impacted Firm must include Bob Doe in the submission to satisfy full record submission requirements, although Bob Doe’s CAT Customer record does not cause an inconsistency in this scenario.

File	Data
Data	<pre> { "fdidRecordList": [ { "fdidRecordID": 1, "firmDesignatedID": "ABC89592", "fdidType": "ACCOUNT", "accountType": ["<del>BROKERAGE</del>OTHER"], "accountName": "BKRGACCT123", "fdidDate": 20050219, "<u>clearingBrokerID": ["1234"],</u> "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": 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",             "tidValue": "2db58cda470d70297055ba46060e2cab894e89bda6bfbbeb6a83b6026ef5c0341"         },         {             "customerRecordID": <del>1</del>2,             "tidType": "SSN/ITIN",             "tidValue": "facfa84f17d230eba97d9fbb80fd204eda2f3550f792f1bf00f841e522960813"         }     ] } </pre>



## Submission by Triggering Firm which Triggers a Material Inconsistency

In this submission, a second ~~CAT Reporter~~ Industry Member (the Triggering Firm) also submits an FDID Record with Marie Doe and Bob Doe associated to the FDID. ~~the same CAT~~. The Triggering Firm's Customer Record for Marie Doe has ~~with materially different data than previously reported for the same customer by the other CAT Reporter (the Impacted Firm)~~. The Triggering Firm includes a different yearOfBirth of ('1997'), ~~which differs from the what the Impacted Firm~~ 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": [<del>"BROKERAGE"</del>, "OPTION"],       "accountName": "<del>-ACCT02934"</del>",       "fdidDate": 20111201,       "<u>clearingBrokerID": ["1234"],</u>       "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         }       ]     }   ],   "naturalPersonCustomerList": [     {       "customerRecordID": 1,       "firstName": "Marie",       "middleName": "F",       "lastName": "Doe",       "yearOfBirth": 1997,       "customerType": ["NOTAPPLICABLE"]     }   ], } </pre>

File	Data
	<pre>{   "customerRecordID": 2,   "firstName": "Bob",   "lastName": "DoeSmith",   "yearOfBirth": 1975,   "customerType": ["NOTAPPLICABLE"] }</pre>
TIDs	<pre>{   "tidRecordList": [     {       "customerRecordID": 1,       "tidType": "SSN/ITIN",       "tidValue":       "2db58cda470d70297055ba46060e2cab894e89bda6bfbeb6a83b6026ef5c0341"     },     {       "customerRecordID": 2,       "tidType": "SSN/ITIN",       "tidValue":       "facfa84f17d230eba97d9fbb80fd204eda2f3550f792f1bf00f841e522960813"     }   ] }</pre>

### **Updating Submission- 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 must take an action in order to resolve the Material Inconsistency for their firm.

In this scenario, the Triggering Firm is reconfirming the yearOfBirth (of '1997') that it submitted to CAIS, which still differs from what the Impacted Firm the previously reported to CAIS value of ('1979') by the Impacted Firm. The Triggering Firm must include the updateNotification field populated with 'true' for that Customer Record in order to resolve the inconsistency. Once the Industry Member has submitted the Customer Record with an updateNotification set to 'true', a "grace period" will start and the Industry Member will not receive any interfirm inconsistencies for that record for the next 365 days.

In addition, the Triggering Firm must resubmit the FDID Record with all Customer associations, as omitting the Customer Record for Bob Doe would remove this Customer's association to the FDID.

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "ACCT02934",       "fdidType": "ACCOUNT", </pre>

File	Data
	<pre> "accountType": [<del>"BROKERAGE"</del>, "OPTION"], "accountName": "<del>-</del>ACCT02934", "fdidDate": 20111201, <del>"clearingBrokerID": ["1234"],</del> "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",       "tidValue": "2db58cda470d70297055ba46060e2cab894e89bda6bfb6eb6a83b6026ef5c0341"     }   ], </pre>

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

### Updating Submission- Impacted Firm Inconsistency Resolution

Once the Triggering Firm has resolved ~~their~~ its ~~Material~~ Material ~~Inconsistency~~ Inconsistency, the Impacted Firm is notified of the inconsistency with ~~their~~ its 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- GCID for details on inconsistency notification and resolution.~~

~~The Impacted Firm must include the *updateNotification* field populated with 'true' for that Customer Record in order to resolve the inconsistency. Once the Industry Member has submitted the Customer Record with an *updateNotification* set to 'true', a "grace period" will start and the Industry Member will not receive any interfirm inconsistencies for that record for the next 365 days.~~

~~In this example, the Impacted Firm is updating the *yearOfBirth* from what it reported in its original submission ('1979') to '1997'. In addition, the Impacted Firm must resubmit the FDID Record with all Customer associations, as omitting the Customer Record for Bob Doe would remove this Customer's association to the FDID.~~

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "ABC89592",       "fdidType": "ACCOUNT",       "accountType": ["<del>BROKERAGE</del>OTHER"],       "accountName": "BKRACCT123",       "fdidDate": 20050219,       "<u>clearingBrokerID": ["1234"],</u>       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "150 SW ORANGE ST",           "city": "BROOKLYN",           "regionCode": "US-NY", </pre>

File	Data
	<pre> "countryCode": "US", "postalCode": "11201" } ], "fdidCustomerList": [ { "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20050219 } ] }, "naturalPersonCustomerList": [ { "customerRecordID": 1, "firstName": "Marie", "lastName": "Doe", "yearOfBirth": 1997, "customerType": ["NOTAPPLICABLE"], "updateNotification": true }, { "customerRecordID": 6, "firstName": "Bob", "lastName": "Doe", "yearOfBirth": 1975, "customerType": ["NOTAPPLICABLE"] } ] } </pre>
TIDs	<pre> { "tidRecordList": [ { "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "2db58cda470d70297055ba46060e2cab894e89bda6bfb6a83b6026ef5c0341" }, { "customerRecordID": 6, "tidType": "SSN/ITIN", "tidValue": "facfa84f17d230eba97d9fbb80fd204eda2f3550f792f1bf00f841e522960813" } ] } </pre>

## 5.4. ~~Changing an EIN~~Correcting an Erroneous TID Value

### 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",           "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": [     { </pre>

File	Data
	<pre> ----- "customerRecordID": 1, "tidType": "EIN", "tidValue": "ffb84a69fcb89a4a5d07584a0d1bcc5ee6ee4e258d5a1410d37277ec1130b785" ----- } } </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",       "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, </pre>

File	Data
	<pre> <del> "legalName": "ABC Corporation", "ein": "00-3583529", "customerType": ["NOTAPPLICABLE"], }, { "customerRecordID": 2, "legalName": "ABC Corporation", "ein": "00-4577325", "customerType": ["NOTAPPLICABLE"], } } } </del> </pre>
TIDs	<pre> { "tidRecordList": [ { "customerRecordID": 1, "tidType": "EIN", "tidValue": "fffb84a69fcb89a4a5d07584a0d1bcc5ec6ec4e258d5a1410d37277ee1130b785", "replacedByTIDType": "EIN", "replacedByTID": "fffb84a69fcb89a4a5d07584a0d1bcc5ec6ec4e258d5a1410d37277ee1130b785" }, { "customerRecordID": 2, "tidType": "EIN", "tidValue": "4e8f21e1d71b0d1520858ca4903a2212d82f8f3d2ef8f1bcccc059388e3d3087" } } } </pre>

#### **5.4.1. Correcting an Erroneous TID Value**

This scenario illustrates the CAT reporting requirements when an Industry Member has submitted a Customer Record to CAIS which passed data validation checks, but the Industry Member later determines that the Input Identifier used to generate the *tidValue* was erroneously entered. For contrast, see Scenario 6.1.3: Correcting a Malformed TID Error where the Input Identifier did not pass data validation checks due to an invalid format.

In this example, the Industry Member initially used an EIN value of '00-0698421' for the TID; however, it later determined that the correct EIN value for the Customer was '00-0698422'.

For the Customer Record generated from the erroneous TID value, the Industry Member must resubmit the Customer Record with a *roleEndDate* populated with the same date as the *roleStartDate* to indicate that the Customer Record should never have been associated to the FDID. In addition, the Industry Member must populate a *roleEndReason* of 'CORRECTION' for the erroneous Customer Record. It is not permissible to implicitly end this Customer's record by omitting it from the resubmission.



In this example, the Customer's role did not change when the Input Identifier was corrected, so, for the Customer Record generated from the correct TID value, the roleStartDate must be the original date the Customer entered into the role of 'TRDHOLDER'. In the Identifiers File, the Industry Member must populate the Customer's correct TID value.

It is not permissible to use the replacedByTID functionality in scenarios where the TID was submitted to CAIS as an erroneous value.

The updated tidValue for the CAT Customer must be propagated across all FDID associations at the Industry Member.

### **Original Submission with Erroneous TID Value**

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "IA7026",       "fdidType": "ACCOUNT",       "accountType": ["OTHER"],       "accountName": "Bkr Acct",       "fdidDate": 20220102,       "clearingBrokerID": ["1234"],       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "5 MAPLE AVE",           "city": "AUSTIN",           "regionCode": "US-TX",           "countryCode": "US",           "postalCode": "73301"         }       ],       "fdidCustomerList": [         {           "customerRecordID": 1,           "role": "TRDHOLDER",           "roleStartDate": 20220102         }       ]     }   ],   "legalEntityCustomerList": [     {       "customerRecordID": 1,       "legalName": "ABC Corporation",       "ein": "00-0698421",       "customerType": ["NOTAPPLICABLE"],     }   ] } </pre>
TIDs	<pre> { </pre>

File	Data
	<pre>"tidRecordList": [   {     "customerRecordID": 1,     "tidType": "EIN",     "tidValue":       "cb85ea9881aa9dc3b999ba9c1720a009274d12e3dad929151014cbf2d189af22"   } ]</pre>

### Correcting Submission

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "IA7026",       "fdidType": "ACCOUNT",       "accountType": ["OTHER"],       "accountName": "Bkr Acct",       "fdidDate": 20220102,       "clearingBrokerID": ["1234"],       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "5 MAPLE AVE",           "city": "AUSTIN",           "regionCode": "US-TX",           "countryCode": "US",           "postalCode": "73301"         }       ],       "fdidCustomerList": [         {           "customerRecordID": 1,           "role": "TRDHOLDER",           "roleStartDate": 20220102,           "roleEndDate": 20220102,           "roleEndReason": "CORRECTION"         },         {           "customerRecordID": 2,           "role": "TRDHOLDER",           "roleStartDate": 20220102         }       ]     }   ],   "legalEntityCustomerList": [     {       "customerRecordID": 1,       "legalName": "ABC Corporation", </pre>

File	Data
	<pre> "ein": "00-0698421", "customerType": ["NOTAPPLICABLE"], }, { "customerRecordID": 2, "legalName": "ABC Corporation", "ein": "00-0698422", "customerType": ["NOTAPPLICABLE"], } ] } </pre>
TIDs	<pre> { "tidRecordList": [ { "customerRecordID": 1, "tidType": "EIN", "tidValue": "cb85ea9881aa9dc3b999ba9c1720a009274d12e3dad929151014cbf2d189af22" }, { "customerRecordID": 2, "tidType": "EIN", "tidValue": "db0b3bbfde73b1662acd3dfbb180ad65d76863417c15bb2b375ee77a98f760bd" } ] } </pre>

## 5.5. Resolving a Customer Record Type Inconsistency

This scenario illustrates the CAT reporting requirements when an CAT Reporter firm/Industry Member reports the same foreign CAT Customer twice, with differing Customer Record Types (both as a Natural Person and as a ~~or~~ Legal Entity).

In the original submission, the Industry Member reported the foreign Customer as a Natural Person. In a subsequent submission, the Industry Member reported the foreign Customer as a Legal Entity. The firm/Industry Member encounters a Material n-i inconsistency because it has reported the same foreign CAT Customer within the *naturalPersonCustomerList* and the *legalEntityCustomerList*. This results in Inconsistency Code 30004 (Foreign TID reported as both Natural Person and Legal Entity). The inconsistency is subsequently resolved by submitting the correct Customer Record Type in addition to the *updateNotification* set to 'true'.

### Original Submission as a Natural Person

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

File	Data
	<pre> "fdidRecordID": 1, "firmDesignatedID": " IA0613", "fdidType": "ACCOUNT", "accountType": [<del>"BROKERAGEOTHER"</del>], "accountName": "Acct 789", "fdidDate": 20070513, <del>"clearingBrokerID": ["1234"],</del> "addressList": [   {     "addrType": "ADDRESS1",     "addrLine1": "5 MAPLE AVE",     "city": "AUSTIN",     "regionCode": "US-TX",     "countryCode": "US",     "postalCode": "73301"   } ], "fdidCustomerList": [ <del>{</del> <del>  "customerRecordID": 1,</del> <del>  "role": "TRDHOLDER",</del> <del>  "roleStartDate": 20070513</del> <del>},</del>   {     <del>"customerRecordID": 2,</del>     <del>"role": "TRDHOLDER",</del>     <del>"roleStartDate": 20070513</del>   } ] ], <del>"legalEntityCustomerList": [</del> <del>  {</del> <del>    "customerRecordID": 1,</del> <del>    "legalName": "JANE DOE LIVING TRUST",</del> <del>    "customerType": ["TRUST"]</del> <del>  }</del> <del>],</del> "naturalPersonCustomerList": [   {     "customerRecordID": 2,     "firstName": "JANE",     <del>"lastName": "DOE",</del>     <del>"doingBusinessAs": "JANE DOE LIVING TRUST",</del>     <del>"yearOfBirth": 1979,</del>     "customerType": ["TRUST"]   } ] } </pre>
TIDs	<pre> { "tidRecordList": [ <del>  {</del> <del>    "customerRecordID": 1,</del> <del>    "tidType": "FOREIGN",</del> <del>    "foreignTIDType": "NATIONALID",</del> </pre>

File	Data
	<pre> <del>      "foreignTIDCountryCd": "CA",</del> <del>      "tidValue":</del> <del>      "e6b5aa46b28a5dd7c39a53e2f755d5964228cb656bb436ab7d9cb9afd57961d3"</del> <del>    },</del>     {       "customerRecordID": 2,       "tidType": "FOREIGN"<del>u</del>, <del>      "foreignTIDType": "NATIONALID"<del>u</del>,</del> <del>      "foreignTIDCountryCd": "CA"<del>u</del>,</del>       "tidValue":       "e6b5aa46b28a5dd7c39a53e2f755d5964228cb656bb436ab7d9cb9afd57961d3"     }   ] }</pre>

### Original Submission as a Legal Entity

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": " IA0613",       "fdidType": "ACCOUNT",       "accountType": ["OTHER"],       "accountName": "Acct 789",       "fdidDate": 20070513,       "clearingBrokerID": ["1234"],       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "5 MAPLE AVE",           "city": "AUSTIN",           "regionCode": "US-TX",           "countryCode": "US",           "postalCode": "73301"         }       ],       "fdidCustomerList": [         {           "customerRecordID": 1,           "role": "TRDHOLDER",           "roleStartDate": 20070513         }       ]     }   ],   "legalEntityCustomerList": [     {       "customerRecordID": 1,       "legalName": "JANE DOE LIVING TRUST",       "customerType": ["TRUST"]     }   ] }</pre>

File	Data
	<pre> ] } </pre>
TIDS	<pre> {   "tidRecordList": [     {       "customerRecordID": 1,       "tidType": "FOREIGN",       "foreignTIDType": "NATIONALID",       "foreignTIDCountryCd": "CA",       "tidValue":         "e6b5aa46b28a5dd7c39a53e2f755d5964228cb656bb436ab7d9cb9afd57961d3"     }   ] } </pre>

### Correcting Updating Submission

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": " IA0613",       "fdidType": "ACCOUNT",       "accountType": ["<del>BROKERAGE</del>OTHER"],       "accountName": "Acct 789",       "fdidDate": 20070513,       "clearingBrokerID": ["1234"],       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "5 MAPLE AVE",           "city": "AUSTIN",           "regionCode": "US-TX",           "countryCode": "US",           "postalCode": "73301"         }       ],       "fdidCustomerList": [         {           "customerRecordID": 2,           "role": "TRDHOLDER",           "roleStartDate": 20070513         }       ]     }   ],   "naturalPersonCustomerList": [     {       "customerRecordID": 2,       "firstName": "JANE"<u>"</u>,       "<u>"</u>lastName<u>"</u>: "<u>"</u>DOE"<u>"</u>,       "<u>"</u>doingBusinessAs<u>"</u>: "<u>"</u>JANE DOE LIVING TRUST"<u>"</u>, </pre>

File	Data
	<pre> "yearOfBirth": 1979, "customerType": ["TRUST"], "updateNotification": true } </pre>
TIDS	<pre> { "tidRecordList": [ { "customerRecordID": 2, "tidType": "FOREIGN", "foreignTIDType": "NATIONALID", "foreignTIDCountryCd": "CA", "tidValue": "e6b5aa46b28a5dd7c39a53e2f755d5964228cb656bb436ab7d9cb9afd57961d3" } ] } </pre>

## 6. Correction List

This section illustrates the CAT reporting requirements for correcting and deleting malformed *firmDesignatedID* (Error Code 22001) and *tidValue* (Error Code 22900) values. In order to repair these rejections, and Industry Member must include the *correctionList* multi-dimensional array and set a *correctionAction* of either 'CORRECTION' or 'DELETE'. If the submission was determined to be erroneous and should not have been reported to CAIS, an Industry Member must use the 'DELETE' *correctionAction*. The 'DELETE' *correctionAction* does not require a valid record to be submitted in place of the malformed record. Alternatively, the Industry Member can repair the rejection by including a 'CORRECTION' *correctionAction* and referencing a valid FDID or CAT Customer record within the file.

### 6.1.1. Deleting a Malformed FDID Rejection

This scenario illustrates the CAT reporting requirements when a malformed FDID is submitted to CAIS and the Industry Member wishes to resolve the rejection by deleting the submission, indicating that the malformed FDID will not be corrected and resubmitted.

In this example, the Industry Member's original submission included the '@' sign in the *firmDesignatedID* attribute, which is not an allowable value for a Text Data Type. This results in a rejection with Error Code 22001 (Missing or Invalid *firmDesignatedID*) and a *rejectionID* of '999999' in its feedback file. Also in this example, this is the only FDID that the Customer is associated with so the Industry Member will receive Error Code 22523 (Customer Record rejected because an associated FDID was rejected). The Industry Member determines the submission was erroneous and should not have been submitted to CAIS, and deletes the rejected submission. Deleting this FDID will resolve all rejections.

Repairing Error Code 22001 (Missing or Invalid *firmDesignatedID*) requires use of the *correctionList*. In this example, the Industry Member must include the *rejectionID* value of '999999' and a *correctionAction* of 'DELETE' in the *correctionList*.

### Submission with Error

File	Data
Data	<pre>{   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "1@345678910",       "fdidType": "ACCOUNT",       "accountType": ["OTHER"],       "accountName": "ACCT 1Q34567",       "fdidDate": 20160721,       "clearingBrokerID": ["1234"],       "addressList": [         {           "addrType": "ADDRESS1",           "addrLine1": "10 ELM STREET",</pre>



File	Data
	<pre> "addrLine2": "BUILDING 5", "addrLine3": "STE 10", "city": "RICHMOND", "regionCode": "US-NC", "countryCode": "US", "postalCode": "28379" } ], "fdidCustomerList": [ { "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20160721 } ] }, "naturalPersonCustomerList": [ { "customerRecordID": 1, "firstName": "Roger", "lastName": "Smith", "yearOfBirth": 1981, "customerType": ["NOTAPPLICABLE"] } ] } </pre>
TIDs	<pre> { "tidRecordList": [ { "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "568ca6d8af479889d124c329061ea0762a9c87abc3c80fddb659804477531e1a" } ] } </pre>

### **Repairing Submission by Deleting the FDID Record**

In this example, main-level JSON objects are included for clarity.

File	Data
Data	<pre> { "version": "2.0.0", "catReporterCRD": 12345, "catSubmitterID": 12345, "fdidRecordCount": 0, "naturalPersonCustomerRecordCount": 0, "legalEntityCustomerRecordCount": 0, "correctionList": [ { "rejectionID": 999999, </pre>

File	Data
	<pre> "correctionAction": "DELETE" } ] } </pre>
TIDs	<pre> { "version": "2.0.0", "tidRecordCount": 0 } </pre>

### 6.1.2. Correcting a Malformed FDID Rejection

This scenario illustrates the CAT reporting requirements when a malformed FDID is submitted to CAIS and the Industry Member wishes to resolve the rejection by correcting the FDID rather than deleting the FDID Record.

In this example, the Industry Member's original submission included the '@' sign in the *firmDesignatedID* attribute, which is not an allowable value for a Text Data Type. This results in a rejection with Error Code 22001 (Missing or Invalid *firmDesignatedID*) and a *rejectionID* of '12345' in its feedback file. The Industry Member determines the FDID was reported to CAIS with an incorrect *firmDesignatedID* value of '1@34567', and that it must repair the *firmDesignatedID* with a value of '1A34567'.

Repairing Error Code 22001 (Missing or Invalid *firmDesignatedID*) requires use of the *correctionList*. In this example, the Industry Member must include the *rejectionID* value of '12345', a *correctionAction* of 'CORRECTION' and a *correctingFirmDesignatedID* value of '1A34567' in the *correctionList*. The *correctingFirmDesignatedID* value must reference a corresponding FDID that is either included in the current submission file or was accepted by CAT CAIS in a prior submission file.

#### Original Submission with Error

File	Data
Data	<pre> { "fdidRecordList": [ { "fdidRecordID": 1, "firmDesignatedID": "1@34567", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "accountName": "ACCT 1S34567", "fdidDate": 20160721, "clearingBrokerID": ["1234"], "addressList": [ { "addrType": "ADDRESS1", "addrLine1": "10 ELM STREET", "addrLine2": "BUILDING 5", "addrLine3": "STE 10", "city": "RICHMOND", </pre>

File	Data
	<pre> "regionCode": "US-NC", "countryCode": "US", "postalCode": "28379" } ], "fdidCustomerList": [ { "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20160721 } ] }, "naturalPersonCustomerList": [ { "customerRecordID": 1, "firstName": "Roger", "lastName": "Smith", "yearOfBirth": 1981, "customerType": ["NOTAPPLICABLE"] } ] } ] } </pre>
TIDs	<pre> { "tidRecordList": [ { "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "568ca6d8af479889d124c329061ea0762a9c87abc3c80fddb659804477531e1a" } ] } </pre>

### Repairing Submission by Correcting the FDID Record

File	Data
Data	<pre> { "fdidRecordList": [ { "fdidRecordID": 1, "firmDesignatedID": "1A34567", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "accountName": "ACCT 1A34567", "fdidDate": 20160721, "clearingBrokerID": ["1234"], "addressList": [ { "addrType": "ADDRESS1", "addrLine1": "10 ELM STREET", "addrLine2": "BUILDING 5", </pre>

File	Data
	<pre> "addrLine3": "STE 10", "city": "RICHMOND", "regionCode": "US-NC", "countryCode": "US", "postalCode": "28379" } ], "fdidCustomerList": [ { "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20160721 } ] }, ], "naturalPersonCustomerList": [ { "customerRecordID": 1, "firstName": "Roger", "lastName": "Smith", "yearOfBirth": 1981, "customerType": ["NOTAPPLICABLE"] } ], "correctionList": [ { "rejectionID": 12345, "correctionAction": "CORRECTION", "correctingFirmDesignatedID": "IA34567" } ] } ] } </pre>
TIDs	<pre> { "tidRecordList": [ { "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "568ca6d8af479889d124c329061ea0762a9c87abc3c80fddb659804477531e1a" } ] } </pre>

### **6.1.3. Correcting a Malformed TID Error**

This scenario illustrates the CAT reporting requirements when an Industry Member 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'). This results in a rejection with Warning Code 24907 (Malformed TID Record -Invalid Input Identifier used to generate *tidValue* for

tidType of EIN) and Error Code 22900 (Malformed TID Record – CAT Customer Record not processed) and a rejectionID of '12345' in the Industry Member's feedback file.

Repairing Error Code 22900 (Malformed TID Record – CAT Customer Record not processed) requires use of the correctionList. In this example, the Industry Member must include the rejectionID value of '12345', a correctionAction of 'CORRECTION' and a correctingCustomerRecordID (referencing the customerRecordID included in the current submission file that is correcting the rejection).

**Original Submission with Error**

File	Data
Data	<pre> {   "fdidRecordList": [     {       "fdidRecordID": 1,       "firmDesignatedID": "IA0867",       "fdidType": "ACCOUNT",       "accountType": ["OTHER"],       "accountName": "Bridge Corp",       "fdidDate": 20120520,       "clearingBrokerID": ["1234"],       "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>
TIDs	<pre> {   "tidRecordList": [     { </pre>

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

### **Repairing Submission by Correcting the Customer Record**

The firm creates a Correcting Submission that includes the correct Customer Record and corresponding TID, noting the *rejectionID* value of '12345', a *correctionAction* of 'CORRECTION' and a *correctingCustomerRecordID* (referencing the *customerRecordID* included in the current submission file that is correcting the rejection).

File	Data
Data	<pre> { "fdidRecordList": [   {     "fdidRecordID": 1,     "firmDesignatedID": "IA0867",     "fdidType": "ACCOUNT",     "accountType": ["OTHER"],     "accountName": "Bridge Corp",     "fdidDate": 20120520,     "clearingBrokerID": ["1234"],     "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
	<pre>       }     ],     "correctionList": [       {         "rejectionID": 12345,         "correctionAction": "CORRECTION",         "correctingCustomerRecordID": 1       }     ]   } </pre>
TIDs	<pre> {   "tidRecordList": [     {       "customerRecordID": 1,       "tidType": "EIN",       "tidValue":         "3fb5f53b2266b80eab62eeb791b7294577b22b73cf25d028d9284591753aa86f "     }   ] } </pre>