Industry CAT CAIS Release Status

June 8th, 2022

Full CAIS Production Certification and Compliance Deadlines Extended

The Participants have determined to delay the full Customer Account Information System ("CAIS") compliance deadline from July 11, 2022, to a date projected to be in Q4 2022, which new date will be subsequently announced. This extension of the compliance deadline will assist in addressing reporting challenges and delays in error feedback and processing and will allow time for such issues to be remediated. The CAIS testing environment has been available since January 31, 2022, and the production environment has been available since April 25, 2022. While the compliance deadline for full CAIS reporting is moving to a later date, Industry Members are expected to continue testing and now will be required to certify for production system access by no earlier than July 25, 2022 (instead of July 11, 2022). There will be interim reporting requirements between July and Q4 2022 to ensure Industry Members can comply with CAIS reporting requirements by the new full CAIS compliance deadline. In the coming days, the Participants and FINRA CAT will be scheduling an industry webinar and providing further information to Industry Members regarding the new interim reporting requirements and compliance schedule.

Agenda

- LTID Release Update
- Full CAIS Release Update
- Planned Enhancements
- Specification Updates
- Certification Reminders
- General Announcements & Reminders
- Q&A

Industry CAT CAIS LTID Release Update

CAIS LTID Phase Statistics –
May 30th – June 5th, 2022

Production Environment							
	Monday, 5/30	**Tuesday, 5/31**	**Wednesday, 6/1**	**Thursday, 6/2**	**Friday, 6/3**	**Saturday, 6/4**	**Sunday, 6/5**
Number of Total Submitters	25	52	64	62	63	20	4
Number of Unique Firms	27	305	502	518	420	408	5
Number of Files Received	Total: 31 Reporter Portal: 0 SFTP: 31	Total: 354 Reporter Portal: 11 SFTP: 343	Total: 1,382 Reporter Portal: 400 SFTP: 982	Total: 1,241 Reporter Portal: 146 SFTP: 1,095	Total: 883 Reporter Portal: 29 SFTP: 854	Total: 814 Reporter Portal: 0 SFTP: 814	Total: 13 Reporter Portal: 9 SFTP: 4
Number of Files Rejected	0	18	8	5	3	18	0
File Reject Rate	0.00%	5.08%	0.58%	0.40%	0.34%	2.21%	0.00%

CAIS LTID Phase Statistics – May 30th – June 5th, 2022

Production Environment							
	Monday, 5/30	Tuesday, 5/31	Wednesday, 6/1	Thursday, 6/2	Friday, 6/3	Saturday, 6/4	Sunday, 6/5
Records Accepted	182,506	2,078,068	1,003,375	1,031,296	851,501	684,184	471
Records Rejected	13	377	50	33	34	18	0
Records Submitted	182,519	2,078,445	1,003,425	1,031,329	851,535	684,202	471
Record Rejection Rate	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

CAT CAIS LTID Open Issues List – As of 6/6/2022
Release Planned/Workaround Provided

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production Environment Targeted Release Date/Workaround	Area Affected
1	Open	N/A	Instances of an LTID Phase submission file not completing processing and remaining in a RECORD_SCAN_COMPLETED as a result of an error in the handling of the Submission ID. The feedback file available on the SFTP will contain any identified rejections, however the final transition to the Completed state is not received.	Code Release	High	**Fix:** Deployed 6/8	**Fix:** No later than 6/25/2022	Data Validation
2	NEW – Open	N/A	Some rejection repairs are not properly reflected in the Submission Report information. This also impacts statistics in the monthly Report Card.	Code Release	High	**Fix:** No later than 6/26/2022	**Fix:** No later than 7/1/2022	Data Validation & Report Cards

CAT CAIS LTID Recently Closed Issues List – As of 6/6/2022

#	Status	Error Code	Issue Summary	Resolution	Priority	Test Environment Release Date	Production Environment Release Date	Area Affected

Industry CAT Full CAIS Release Update

Industry Member Release Rollout – Pre–Production

Full CAIS Release 1
Industry Test – 1/31/2022
Production – 4/25/2022

Ingestion
- Industry Test Open for Machine-to-Machine File & Data Integrity Validations, Material Inconsistencies, and Feedback
- Feedback file contains up to 1,000 Rejections

CAIS Reporter Portal
- Manual File Upload
- Manual Submission
- Submission Feedback
- Inconsistencies Feedback
- Nightly Inconsistencies Report

Full CAIS Certification
opened on 2/1/2022

Full CAIS Release 2a
Industry Test – 3/28/2022
Production – 4/25/2022

Ingestion
- New DRIVERLICENSE Foreign TID Type
- EIN Validation changed to format validation
- Feedback file enhanced to include all Rejections feedback

CAIS Reporter Portal
- FDID Reconciliation Report updated with Full CAIS information (count of CAT Customers and Version information)

Full CAIS Release 2b
Industry Test – 4/11/2022
Production – 4/25/2022

Ingestion
- Remove OTHBKR and CP customerType values for Legal Entity Customer Records
- Remove BROKERAGE and ADVISED values for accountType
- Remove primeBrokerID and bankDepositoryID fields and add a new DVPCustodianID field

Industry Member Release Rollout – Production

Full CAIS Release 3a
Industry Test – 5/25/2022
Production – 6/13/2022

Ingestion
- New Authorized Trader Names List on FDID record
- Increase *lastName* field length to 200 characters

Reports
- FDID Version Report posted to SFTP weekly, containing active LTID Phase FDIDs not updated to Full CAIS Phase

CAIS Reporter Portal
- FDID Version Report available on-demand, containing active LTID Phase FDIDs not updated to Full CAIS Phase

Full CAIS Release 3b
Industry Test – 6/13/2022
Production – 6/27/2022

Ingestion
- New OTHGOVT Foreign TID Type

Full CAIS Release 4
Industry Test – 8/29/2022
Production – 9/12/2022

Ingestion
- New INACTIVE FDID End Reason

- Automated Transfer Procedure

Full CAIS Phase Statistics – May 30th – June 5th, 2022

Industry Test Environment							
	Monday, 5/30	**Tuesday, 5/31**	**Wednesday, 6/1**	**Thursday, 6/2**	**Friday, 6/3**	**Saturday, 6/4**	**Sunday, 6/5**
Number of Total Submitters	8	19	27	26	28	7	3
Number of Unique Firms	15	145	213	287	215	67	63
Number of Files Received	51	664	1,574	969	734	792	250
Number of Files Rejected	7	12	93	51	30	16	2
File Reject Rate	13.73%	1.81%	5.91%	5.26%	4.09%	2.02%	0.80%

Full CAIS Phase Statistics – May 30th – June 5th, 2022

Industry Test Environment							
	Monday, 5/30	**Tuesday, 5/31**	**Wednesday, 6/1**	**Thursday, 6/2**	**Friday, 6/3**	**Saturday, 6/4**	**Sunday, 6/5**
FDID Records Accepted	103,981	365,296	1,170,743	336,055	582,878	260,161	41,099
FDID Records Rejected	2,980	775,036	437,299	352,940	202,048	78,459	24,493
FDID Records Submitted	106,961	1,140,332	1,608,042	688,995	784,926	338,620	65,592
FDID Record Rejection Rate	2.79%	67.97%	27.19%	51.23%	25.74%	23.17%	37.34%

Full CAIS Phase Statistics – May 30th – June 5th, 2022

Industry Test Environment							
	Monday, 5/30	**Tuesday, 5/31**	**Wednesday, 6/1**	**Thursday, 6/2**	**Friday, 6/3**	**Saturday, 6/4**	**Sunday, 6/5**
Customer Records Accepted	104,487	445,051	1,112,946	371,624	597,622	312,034	51,748
Customer Records Rejected	3,093	245,034	159,962	62,633	71,839	14,973	2,097
Customer Records Submitted	107,580	690,085	1,272,908	434,257	669,461	327,007	53,845
Customer Record Rejection Rate	2.88%	35.51%	12.57%	14.42%	10.73%	4.58%	3.89%

Full CAIS Phase Statistics – May 30ᵗʰ – June 5ᵗʰ, 2022

Production Environment							
	Monday, 5/30	Tuesday, 5/31	Wednesday, 6/1	Thursday, 6/2	Friday, 6/3	Saturday, 6/4	Sunday, 6/5
Number of Total Submitters	26	51	64	62	63	20	4
Number of Unique Firms	28	304	502	520	418	408	5
Number of Files Received	32	353	1,382	1,243	881	814	13
Number of Files Rejected	0	18	8	5	3	18	0
File Reject Rate	0.00%	5.10%	0.58%	0.40%	0.34%	2.21%	0.00%

Full CAIS Phase Statistics – May 30th – June 5th, 2022

Production Environment							
	Monday, 5/30	**Tuesday, 5/31**	**Wednesday, 6/1**	**Thursday, 6/2**	**Friday, 6/3**	**Saturday, 6/4**	**Sunday, 6/5**
FDID Records Accepted	0	2	53	7	10	0	0
FDID Records Rejected	0	0	0	0	1	0	0
FDID Records Submitted	0	2	53	7	11	0	0
FDID Record Rejection Rate	0.00%	0.00%	0.00%	0.00%	9.09%	0.00%	0.00%

Full CAIS Phase Statistics – May 30th – June 5th, 2022

Production Environment							
	Monday, 5/30	Tuesday, 5/31	Wednesday, 6/1	Thursday, 6/2	Friday, 6/3	Saturday, 6/4	Sunday, 6/5
Customer Records Accepted	0	4	4	7	10	0	0
Customer Records Rejected	0	0	0	0	1	0	0
Customer Records Submitted	0	4	4	7	11	0	0
Customer Record Rejection Rate	0.00%	0.00%	0.00%	0.00%	9.09%	0.00%	0.00%

Full CAIS Phase Rejection Observations

Rejection Source	Top Rejection Reasons
File	- Duplicated File Name - Missing or Invalid FDID Record Count, Legal Entity Record Count, or Natural Person Record Count - Invalid CAIS File Name - Missing or invalid CAT Reporter CRD
FDID	- Missing *fdidCustomerList* - Missing ADDRESS1 type Address Record - Missing or Invalid *customerRecordID* within *fdidCustomerList* - Missing or Invalid *accountType* *roleStartDate* set prior to *fdidDate*
Customer	*customerRecordID* not present in Identifiers file - Customer rejected because FDID was rejected - Malformed TID - Customer record has an open Material Inconsistency and *updateNotification* was not set as true - Missing or Invalid *customerType*

Planned Enhancements and Specification Updates

CAT Full CAIS Open Issues List – As of 6/6/2022 Release Planned/Workaround Provided

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production Environment Targeted Release Date/Workaround	Area Affected
1	Open	N/A	Users are not able to include a correctionList entry in a Manual Form Submission. This impacts error codes 22001 and 22900.	Code Release	Low	Deployed on 5/25/2022	**Fix:** 6/13/2022	Manual Form Submission
2	Open	N/A	Submission Report shows more results than the selected records per page when the user changes to a new View Data As perspective.	Code Release	Low	Deployed on 5/25/2022	**Fix:** 6/13/2022	Reporter Portal
3	Updated-Open	N/A	In certain cases where multiple records are rejected for a malformed or duplicated FDID, or malformed TID, the multiple rejection instances are counted as a single processed record and rejection, resulting in a lower count of processed records than were in the submission file.	Code Release	Medium	Deployed on 5/25/2022	**Fix:** 6/13/2022	Data Validation
4	Open	N/A	Data file submissions intermittently display on the Reporter portal as in progress and completed simultaneously.	Code Release	Low	Deployed on 5/25/2022	**Fix:** 6/13/2022	Reporter Portal
5	Updated-Open	N/A	Some nightly inconsistencies feedback files may be null or may not contain the identified Impacted inconsistencies for the day.	Code Release	High	**Fix:** No later than 6/26/2022	**Fix:** No later than 7/1/2022	Inconsistencies

*** The Known Issues List is published on www.catnmsplan.com under "Industry Member Specifications" ***

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CAT Full CAIS Open Issues List – As of 6/6/2022
Release Planned/Workaround Provided

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production Environment Targeted Release Date/Workaround	Area Affected
6	Open	22061	FDID records are incorrectly rejected when the *fdidCustomerList* includes records with a *role* of TRDHOLDER or NTHOLDER and the *hasDiscretion* attribute is included in the file with a Boolean null.	Code Release	High	Deployed on 5/25/2022	**Fix:** 6/13/2022	Data Validation
7	Open	22041	Instances of CAIS Data feedback containing 22041 errors when the *customerRecordID* is present in the file on either a Natural Person or Legal Entity customer record, and the same *customerRecordID* has a malformed TID warning in the CAIS TIDS feedback. A 22048 error is expected instead of the 22041 error.	Code Release	Medium	**Fix:** No later than 6/26/2022	**Fix:** 7/1/2022	Data Validation
8	Open	N/A	Counts of Customers and FDIDs in submission file do not match the *receivedFDIDRecordCount*, *receivedNaturalRecordCount*, or *receivedLegalEntityRecordCount* attributes in the CAIS Data Feedback File when records are rejected due to a malformed/duplicated FDID or malformed TID.	Code Release	High	**Fix:** No later than 6/26/2022	**Fix:** 7/1/2022	Data Validation

CAT Full CAIS Open Issues List – As of 6/6/2022
Release Planned/Workaround Provided

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production Environment Targeted Release Date/Workaround	Area Affected
9	Updated-Open	N/A	Submission files transitioned to a COMPLETED_FILE_TIMEOUT state due to one of the intended paired files failing Integrity check, not being submitted in a timely fashion, or failing unexpectedly, display errantly on the In Progress tab within the Reporter Portal UI. Expected behavior is the timed out file moves to the Completed Submissions tab. COMPLETED_FILE_TIMEOUT feedback is available for the submission file on the SFTP site.	Code Release	Medium	**Fix:** No later than 6/26/2022	**Fix:** No later than 7/1/2022	Reporter Portal
10	Open	N/A	Intermittent instances of CAIS Data files remaining in a FILE_INTEGRITY_PASSED status for an extended time and not completing processing, when the same CAT Customer is reported with multiple customerRecordID values, one for each association to the FDID Record, when reporting via Option 2 in Scenario 3.5.1.	Code Release	High	**Fix:** 6/29/2022	**Fix:** 7/3/2022	Data Ingestion

CAT Full CAIS Open Issues List – As of 6/6/2022 Release Planned/Workaround Provided

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production Environment Targeted Release Date/Workaround	Area Affected
11	NEW – Open	N/A	Users from Self-Reporter firms are not able to access the Customer Rejections tab within the Reporter Portal. Attempting to access the page returns an error indicating the user is "Not authorized for requested CRD".	Code Release	High	**Workaround:** Feedback is available by SFTP for all files, and the Completed Submissions tab for Manual Form Submission or files uploaded via the CAIS Reporter Portal UI. **Fix:** No later than 6/26/2022	**Fix:** No later than 7/1/2022	Reporter Portal

CAT Full CAIS Recently Closed Issues List
As of 6/6/2022

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production Environment Targeted Release Date/Workaround	Area Affected

CAT CAIS Planned Enhancements – Open

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date	Production Environment Targeted Release Date	Area
1	Open	N/A	The Update button on a Manual Form Submission is enabled when viewing a previously added record. The button should be disabled until at least one field is updated by the user.	Code Release	Low	**Fix:** TBD	**Fix:** 7/11/2022	Manual Form Submission
2	Open	N/A	When selecting date values in the Manual Form Submission, the date is not selected when the user first clicks a date. The date is only selected on the second click.	Code Release	Low	**Fix:** TBD	**Fix:** 7/11/2022	Manual Form Submission
3	Open	N/A	Certain columns are not displayed in the Submission Report by default.	Code Release	Low	**Workaround:** User may add the columns to their view. **Fix:** TBD	**Fix:** 7/11/2022	Reporter Portal
4	Open	N/A	Update SFTP feedback file to include "CANCELLED_BY_SUPPORT" status.	Code Release	Medium	Deployed on 5/25/2022	**Fix:** 6/13/2022	Reporter Portal
5	Open	22999	Increase the current 100 Customer Record limit on number of CAT Customers that can be associated with an FDID Record.	Code Release	Medium	**Fix:** TBD	**Fix:** TBD	Data Validation

CAT CAIS Planned Enhancements – Recently Closed

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date	Production Environment Targeted Release Date	Area

CAT CAIS–
Planned LTID Phase Specification Updates

#	Status	Summary	Publish Date	Spec Version
1	Open	Clarify that malformed LTID can be corrected by sending the same FDID with corrected LTID entry - does NOT require *correctionAction* message	TBD	V1.2.3

CAT CAIS–
Planned Full CAIS Phase Specification Updates

#	Status	Summary	Publish Date	Spec Version	Effective Date - Test	Effective Date - Prod
1	Published	Add a new *fdidEndReason* value of 'INACTIVE' as option to end FDIDs that have had no CAT-reportable activity events (e.g., MENO, MEOR, MEOT, etc.) associated with the Account in the prior six months. For the purposes of periodic refresh requirements, monthly refresh report excludes any FDID with an *fdidEndReason* of 'INACTIVE' populated and an *fdidEndDate* set on or before the date of the report.	3/9/2022	2.0r7	8/28/2022	9/11/2022
2	Published	Add an additional *foreignTIDType* value of an other government assigned identifier ("OTHGOVT") that is known to have been assigned by a non-national level government entity, such as a local government entity. The OTHGOVT *foreignTIDType* will be added as the last entry in the Foreign TID Type hierarchy, after "DRIVERLICENSE," and will be usable for both Natural Person and Legal Entity CAT Customers.	4/8/2022	2.0r8	6/13/2022	6/27/2022
3	Published	Add a multi-dimensional array on the FDID, called *authTraderNamesList*, for reporting of Natural Person Authorized Traders where an Industry Member has not historically collected and systematized all data required to report the trader as a Natural Person CAT Customer, and will not be able to collect and systematize the data by July 11, 2022. The Authorized Trader Names List must only include Natural Person Authorized Traders, where the IM does not have all data required to report the Authorized Trader as a full CAT Customer record	4/8/2022	2.0r8	5/25/2022	6/13/2022
4	Open	Update the description of Error Code 22523 – Customer Record rejected because an associated FDID was rejected – to include that the Error Code is also returned in the event the Customer Record is not associated to at least one FDID within the submission file.	TBD	2.0r10	N/A	N/A
5	Open	Update the October 11, 2022 date in the description of the role value of 'AUTH3RD' to be consistent with revised FAQ T7. Specifically, Prior to January 16, 2023, this role may be used when the Industry Member itself has authority to place orders for the Account without prior approval of the account holder(s) and is not the holder of the account. Effective January 16, 2023, the role for the Industry Member must be reported as 'AUTHREP'.	TBD	2.0 r10	N/A	N/A
6	Open	Clarify the description of the customerType value of 'RIC'- Customer is a Registered Investment Company, as defined in the Investment Company Act of 1940 (15 U.S.C. § 80a–3(a)(1)), if maintained in the Industry Member's general customer and account records.	TBD	2.0 r10	N/A	N/A
7	Open	Update the definition of the sentinel file for the Nightly Inconsistencies scans to remove the .bz2 compression. The sentinel file does not contain any significant data and does not require the compression.	TBD	2.0r10	N/A	N/A

* Planned Technical Specification updates are subject to approval by the CAT NMS Plan Operating Committee.

CAT CAIS–
Planned Full CAIS Phase Specification Updates

#	Status	Summary	Publish Date	Spec Version	Effective Date - Test	Effective Date - Prod
8	Open	Clarify that a total of 100 Customer Records can currently be associated with an FDID Record. Create additional Error Code for more granularity on this validation, currently feedback provided under Error Code 23999 (Unhandled Exception).	TBD	2.0r10	N/A	N/A
9	NEW – Open	Update the Table 17 and Table 18 entries for the file status of COMPLETED_FILE_TIMEOUT to include the status is also returned in the CAIS Data Feedback or TIDS Feedback files in the event the paired file is received but reaches a COMPLETED_INTEGRITY_ERROR state.	TBD	2.0r10	N/A	N/A

* Planned Technical Specification updates are subject to approval by the CAT NMS Plan Operating Committee.

General Announcements and Reminders

Full CAIS Phase Reporting Certification

➢ Full CAIS Phase certification opened in the Industry Test environment on February 1.

➢ Full CAIS Phase Certification **deadline has been extended to no earlier than July 25, 2022**.

➢ Webinar from October 6, 2021, covered Full CAIS certification requirements and is available on the CAT NMS Plan site.

➢ Certification is also detailed in the Industry Member CAIS Onboarding Guide.

FDID Submissions in Full CAIS Phase – Error Rate Impact

‣ CAIS Report Cards

  ◦ Beginning April 25, 2022, Full CAIS submissions may be reported to the Full CAIS Production Environment.

  ◦ While there is currently no compliance obligation for the reporting of non-LTID FDIDs, all Full CAIS FDID reporting errors are included in the FDID and Overall Compliance Error Rate beginning April 25, 2022 in the CAIS Reporter Daily Statistics and the April 2022 CAIS Report Cards.

  ◦ All Customer Records that are repaired late or are outstanding will be included in the Customer and Overall Submission Error Rate beginning on the Full CAIS compliance date and will be included in the first Full CAIS Report Cards.

‣ Transaction Report Cards

  ◦ FDID errors will be included in the Compliance Error Rates beginning on the-Full CAIS-Compliance date and will be included in the CAT Transaction Report Cards beginning with the first Report Card following the Full CAIS compliance date.

FINRA CAT Announcements and Reminders

- CAT CAIS Checkpoint Calls will now be held weekly. The next call will be on June 15th.

- Upcoming CAIS webinars:
  - Error Repairs and Corrections on Wednesday, 6/29
  - Material Inconsistences on Thursday, 6/30

- Connectivity Guides, Reporting Scenarios, Use Cases, and updated FAQs available at catnmsplan.com

FINRA CAT Helpdesk

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

How to Ask a Question during Today's Call

- **For participants using computer audio:**
  - Click the "Raise Hand" button at the bottom of the participants window.
  - A visual prompt will indicate that your line has been unmuted.

- **For participants using phone audio:**
  - Enter *9 on your phone keypad.
  - An audio prompt will indicate that your line has been unmuted.