Industry CAT CAIS Release Status

June 15th, 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).

Agenda

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

Note – the LTID Release Update *has been moved to an Appendix in this deck given the Full CAIS focus*

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 4
Industry Test – 6/26/2022
Production – 7/1/2022

Ingestion
- New OTHGOVT Foreign TID Type

Performance Enhancements
- CAIS file processing improvements

Minor Enhancements and Bug Fixes

Full CAIS Release 5
Industry Test – TBD
Production – TBD

Ingestion
- New INACTIVE FDID End Reason

- Automated Transfer Procedure

Performance Enhancements
- CAIS file processing improvements

Full CAIS Phase Statistics – June 6th – June 12th, 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	21	29	36	27	32	6	4
Number of Unique Firms	22	138	173	133	97	70	98
Number of Files Received	147	787	1,188	394	787	2,236	337
Number of Files Rejected	14	52	38	8	137	157	4
File Reject Rate	9.52%	6.61%	3.20%	2.03%	17.41%	7.02%	1.19%

Full CAIS Phase Statistics – June 6th – June 12th, 2022

	Monday, 6/6	Tuesday, 6/7	Wednesday, 6/8	Thursday, 6/9	Friday, 6/10	Saturday, 6/11	Sunday, 6/12
Industry Test Environment							
FDID Records Accepted	7,502,992	177,428	7,342,677	7,153,370	4,840,308	5,113,097	4,401,490
FDID Records Rejected	46,682	70,841	329,644	113,601	703,377	227,400	5,793
FDID Records Submitted	7,549,674	248,269	7,672,321	7,266,971	5,543,685	5,340,497	4,407,283
FDID Record Rejection Rate	0.62%	28.53%	4.30%	1.56%	12.69%	4.26%	0.13%

Full CAIS Phase Statistics – June 6th – June 12th, 2022

Industry Test Environment							
	Monday, 6/6	**Tuesday, 6/7**	**Wednesday, 6/8**	**Thursday, 6/9**	**Friday, 6/10**	**Saturday, 6/11**	**Sunday, 6/12**
Customer Records Accepted	7,503,417	217,283	7,417,482	7,160,807	4,869,810	5,297,396	4,424,948
Customer Records Rejected	11,886	24,672	59,380	51,772	200,209	29,910	7,023
Customer Records Submitted	7,515,303	241,955	7,476,862	7,212,579	5,070,019	5,327,306	4,431,971
Customer Record Rejection Rate	0.16%	10.20%	0.79%	0.72%	3.95%	0.56%	0.16%

Full CAIS Phase Statistics – June 6th – June 12th, 2022

Production Environment							
	Monday, 6/6	**Tuesday, 6/7**	**Wednesday, 6/8**	**Thursday, 6/9**	**Friday, 6/10**	**Saturday, 6/11**	**Sunday, 6/12**
Number of Total Submitters	1	3	2	4	2	0	0
Number of Unique Firms	1	3	2	9	2	0	0
Number of Files Received	Total: 1 Reporter Portal: 0 SFTP: 1	Total: 4 Reporter Portal: 3 SFTP: 1	Total: 11 Reporter Portal: 10 SFTP: 1	Total: 11 Reporter Portal: 4 SFTP: 7	Total: 2 Reporter Portal: 1 SFTP: 1	Total: 0 Reporter Portal: 0 SFTP: 0	Total: 0 Reporter Portal: 0 SFTP: 0
Number of Files Rejected	0	0	0	6	0	0	0
File Reject Rate	0.00%	0.00%	0.00%	54.54%	0.00%	0.00%	0.00%

Full CAIS Phase Statistics –
June 6th – June 12th, 2022

Production Environment							
	Monday, 6/6	**Tuesday, 6/7**	**Wednesday, 6/8**	**Thursday, 6/9**	**Friday, 6/10**	**Saturday, 6/11**	**Sunday, 6/12**
FDID Records Accepted	1	4	11	10	2	0	0
FDID Records Rejected	0	0	0	0	0	0	0
FDID Records Submitted	1	4	11	10	2	0	0
FDID Record Rejection Rate	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Full CAIS Phase Statistics – June 6th – June 12th, 2022

Production Environment							
	Monday, 6/6	**Tuesday, 6/7**	**Wednesday, 6/8**	**Thursday, 6/9**	**Friday, 6/10**	**Saturday, 6/11**	**Sunday, 6/12**
Customer Records Accepted	1	4	11	10	1	0	0
Customer Records Rejected	0	0	0	0	0	0	0
Customer Records Submitted	1	4	11	10	1	0	0
Customer Record Rejection Rate	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Full CAIS Phase Rejection Observations

Rejection Source	Top Rejection Reasons
File	• Duplicated File Name • CAIS File not Readable • Paired file not received or encountered a File Integrity Error • Missing or Invalid FDID Record Count, Legal Entity Record Count, or Natural Person Record Count
FDID	• Missing *fdidCustomerList* • Missing ADDRESS1 type Address Record • Missing or Invalid *accountType* • *roleStartDate* set prior to *fdidDate*
Customer	• Malformed TID • Customer rejected because FDID was rejected • Customer record has an open Material Inconsistency and *updateNotification* was not set as true • *customerRecordID* not present in Identifiers file • Missing or Invalid format of *yearOfBirth*

Planned Enhancements and Specification Updates

CAT Full CAIS Open Issues List – As of 6/13/2022 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	Updated – Open	N/A	Data file submissions intermittently display on the Reporter portal as in progress and completed simultaneously.	Code Release	Low	**Fix**: 6/26/2022	**Fix**: 7/1/2022	Reporter Portal
2	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**: 6/26/2022	**Fix**: 7/1/2022	Inconsistencies
3	Updated – 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**: 6/26/2022	**Fix**: 7/1/2022	Data Validation
4	Updated – 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**: 6/26/2022	**Fix**: 7/1/2022	Data Validation

*** 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 6/13/2022 Release Planned/Workaround Provided

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production Environment Targeted Release Date/Workaround	Area Affected
5	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:** 6/26/2022	**Fix:** 7/1/2022	Reporter Portal
6	Updated – 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:** 6/26/2022	**Fix:** 7/1/2022	Data Ingestion

CAT Full CAIS Open Issues List – As of 6/13/2022 Release Planned/Workaround Provided

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production Environment Targeted Release Date/Workaround	Area Affected
7	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:** Deployed 6/13/2022	**Fix:** 7/1/2022	Reporter Portal
8	NEW – Open	N/A	The *correspondentCRD* attribute is incorrectly named *catCorrespondentCRD* within the Submission Inconsistencies Feedback File	Code Release	Medium	**Fix:** 6/26/2022	**Fix:** 7/1/2022	Reporter Portal
9	NEW – Open	N/A	Instances of files failing to complete processing when a large number of updateNotifications are included in the file.	Code Release	High	**Fix:** TBD	**Fix:** TBD	Data Validation
10	NEW – Open	N/A	Intermittent instances where not all TIDs feedback file versions are being generated for a submission. Final feedback is provided including all status transitions, however one or more feedback file versions are missing.	Code Release	Medium	**Fix:** TBD	**Fix:** TBD	Data Validation

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

CAT Full CAIS Recently Closed Issues List
As of 6/13/2022

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production Environment Targeted Release Date/Workaround	Area Affected
1	Closed	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	Deployed on 6/13/2022	Data Validation
2	Closed	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 null.	Code Release	High	Deployed on 5/25/2022	Deployed on 6/13/2022	Data Validation
3	Closed	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	Deployed on 6/13/2022	Manual Form Submission
4	Closed	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	Deployed on 6/13/2022	Reporter Portal

CAT CAIS Planned Enhancements – Open

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date	Production Environment Targeted Release Date	Area
1	Updated – 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:** TBD	Manual Form Submission
2	Updated – 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:** TBD	Manual Form Submission
3	Updated – 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:** TBD	Reporter Portal
4	Updated – Open	22999	Increase the current 100 Customer Record limit on number of CAT Customers that can be associated with an FDID Record.	Code Release	High	**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
1	Closed	N/A	Update SFTP feedback file to include "CANCELLED_BY_SUPPORT" status.	Code Release	Medium	Deployed on 5/25/2022	Deployed on 6/13/2022	Reporter Portal

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	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
10	NEW – Open	Clarify that the nightly inconsistencies scan feedback for Material Inconsistencies where the Industry Member is Impacted by submissions of another Industry Member is provided to the Impacted Industry Member no later than 8AM ET each processing day.	TBD	2.0 r10	N/A	N/A
11	NEW – Open	Remove *submissionStatus* from Submission Inconsistencies Feedback File.	TBD	2.0 r10	TBD	TBD

* 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**.

➢ There are currently **220** firms certified for Full CAIS reporting.

➢ 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](#).

FINRA CAT Announcements and Reminders

- CAT CAIS Checkpoint Calls are now being held weekly. The next call will be on June 22nd.

- The first Report Card containing Full CAIS information was published on June 15th, 2022.

- On June 14th, the Full CAIS Technical Specification Working Group session included a presentation on proposed Full CAIS validation changes for data processing. The materials and recording are available on the CAT NMS Plan website if you were not able to attend.

- 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.

Appendix A:
Industry CAT CAIS LTID Release Update

CAIS LTID Phase Statistics – June 6th – June 12th, 2022

Production Environment							
	Monday, 6/6	**Tuesday, 6/7**	**Wednesday, 6/8**	**Thursday, 6/9**	**Friday, 6/10**	**Saturday, 6/11**	**Sunday, 6/12**
Number of Total Submitters	46	58	64	62	61	20	4
Number of Unique Firms	162	503	541	495	494	300	5
Number of Files Received	Total: 197 Reporter Portal: 24 SFTP: 173	Total: 1,009 Reporter Portal: 19 SFTP: 990	Total: 1,061 Reporter Portal: 23 SFTP: 1,038	Total: 1,020 Reporter Portal: 75 SFTP: 945	Total: 1,050 Reporter Portal: 111 SFTP: 939	Total: 712 Reporter Portal: 0 SFTP: 712	Total: 7 Reporter Portal: 3 SFTP: 4
Number of Files Rejected	0	6	16	5	3	14	0
File Reject Rate	0.00%	0.59%	1.51%	0.49%	0.29%	1.97%	0.00%

CAIS LTID Phase Statistics – June 6th – June 12th, 2022

Production Environment							
	Monday, 6/6	**Tuesday, 6/7**	**Wednesday, 6/8**	**Thursday, 6/9**	**Friday, 6/10**	**Saturday, 6/11**	**Sunday, 6/12**
Records Accepted	278,855	857,490	827,825	836,435	1,040,525	801,711	20,416
Records Rejected	13	80	486	50	45	7	0
Records Submitted	278,868	857,570	828,311	836,485	1,040,570	801,718	20,416
Record Rejection Rate	0.00%	0.00%	0.06%	0.00%	0.00%	0.00%	0.00%

CAT CAIS LTID Open Issues List – As of 6/13/2022
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	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

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

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