Industry CAT CAIS Release Status

August 2, 2023

Update on CAIS Compliance Deadlines

<u>CAT Alert 2023-01</u> establishes new Interim Reporting Obligation 4 and Full CAIS Compliance Go-Live dates for Industry Members. The new deadlines are:

Interim Reporting Obligation 4: May 24, 2024

Compliance Go-Live: May 31, 2024

As noted in <u>CAT Alert 2022-01</u>, FINRA CAT will implement a series of releases to address certain outstanding CAIS system issues that impact Industry Members' ability to comply fully with the CAIS error correction requirements.

Update on CAIS Compliance Deadlines

FINRA CAT will complete the necessary releases to remediate the CAIS system issues and plans to provide Industry Members with a complete list of outstanding errors by April 8, 2024 (ahead of the May 24, 2024 Interim Reporting Obligation 4 date when all outstanding errors must be repaired).

In addition to the Reporter Portal functionality, FINRA CAT will also be addressing issues with loading data to certain data stores supporting error feedback provided through the Reporter Portal. Data load issues impacting Industry Members are isolated to feedback generation. Industry Members will <u>not</u> be asked to resubmit any data.

- ✓ Remediation releases will address Reporter Portal functional issues and data load issues impacting completeness of error feedback through the CAIS Reporter Portal.
- ✓ Data load releases are designed to be seamless to Industry Members until the completion of the data reload, at which time Industry Members may see changes in the error feedback available on the Reporter Portal. Completion of the data reload is anticipated to be in 1Q24 and will occur over a weekend with updated feedback available the Monday after the final data load release.
- ✓ An additional release(s) is planned after the final data reload release, at which time material inconsistencies will be reenabled and a list of all outstanding errors requiring action will be provided to Industry Members. This is planned for April 8, 2024. FDID validations will also be turned on in the Production transaction system at this time.
- ✓ As FINRA CAT implements releases, there may be weekend network blocks outside of regularly scheduled maintenance windows. Such network blocks will be announced with as much advance notice as possible.

Agenda

- Full CAIS Release Update
- Open Issues, Planned Enhancements and Specification Updates
- General Announcements & Reminders
- Q&A
- Appendix

Full CAIS Release Update

Industry Member Release Rollout

2023 Release 1- Customer Address Validation Industry Test – 7/10/2023 Production – 8/7/2023

- Enhance the 22514 Error Code to require an address on every Customer Record
- Enhance Manual Submission screen to require an address on every Customer Record
- Enhance Manual Submission enabling users to copy addresses entered on the FDID Record to a Customer Record

*Per FAQ Q67, effective July 12, 2023, each Customer must be reported to CAIS with at least one address.

2023 Release 2
Industry Test – 9/25/2023
Production – 10/23/2023

- New value of 'INACTIVE' for fdidEndReason, roleEndReason and ltidEndReason
- customerRecordID returned as a Data Type of Array in feedback files
- Address <u>Known Issues</u> impacting Reporter Portal and Data Validation

CAIS Report Card Release

Report Card

- The first Full CAIS Report Card will be published for the first full month following the Full CAIS Compliance Go-Live date.
- Compliance Rates distinguished for Correspondent data

Planned Future Enhancements

- Optimization of error feedback
- Validate that correspondentCRD is a different identifier than the catReporterCRD

Production Environment Monday, 7/24 Tuesday, 7/25 Wednesday, 7/26 Thursday, 7/27 Friday, 7/28 Saturday, 7/29 **Sunday, 7/30 Number of Total** 62 69 23 75 72 69 **Submitters Number of Unique** 399 875 875 879 879 632 26 **Firms** Total: 825 Total: 2,230 Total: 2,232 Total: 2,256 Total: 2,226 Total: 1,670 Total: 48 **Number of Files** Reporter Portal: 19 Reporter Portal: 1 Reporter Portal: 0 Reporter Portal: 22 Reporter Portal: 32 Reporter Portal: 22 Reporter Portal: 22 Received SFTP: 803 SFTP: 48 SFTP: 2,198 SFTP: 2,210 SFTP: 2,234 SFTP: 2,207 SFTP: 1,669 **Number of Files** 24 20 17 18 22 11 Rejected File Reject Rate 2.06% 0.81% 0.66% 1.08% 0.98% 0.90% 0.00%

	Production Environment												
	Monday, 7/24	Tuesday, 7/25 Wednesday, 7/26 Thursday, 7/27 Friday, 7/28 Saturday, 7/29 S											
FDID Records Accepted	1,071,878	2,355,276	2,286,904	2,211,335	2,315,614	2,054,709	3,624,777						
FDID Records Rejected	33,979	160,799	104,083	191,625	145,232	226,242	12,214						
FDID Records Submitted	1,105,857	2,516,075	2,390,987	2,402,960	2,460,846	2,280,951	3,636,991						
FDID Record Rejection Rate	3.07%	6.39%	4.35%	7.974%	5.90%	9.92%	0.34%						

	Production Environment											
	Monday, 7/24	Tuesday, 7/25	Wednesday, 7/26	Thursday, 7/27	Friday, 7/28	Saturday, 7/29	Sunday, 7/30					
Customer Records Accepted	599,632	2,121,302	2,018,122	2,041,999	2,173,183	2,459,378	3,523,012					
Customer Records Rejected	47,493	217,021	149,981	317,642	191,868	267,811	11,842					
Customer Records Submitted	647,125	2,338,323	2,168,103	2,359,641	2,365,051	2,727,189	3,534,854					
Customer Record Rejection Rate	7.34%	9.28%	6.92%	13.46%	8.11%	9.82%	0.34%					

Full CAIS Phase Rejection Observations

Rejection Source	Top Rejection Reasons
File	 Unauthorized CAT Submitter ID Paired Identifiers file not received Missing or Invalid File Version CAIS file not Readable Missing or Invalid Legal Entity Customer Record Count
FDID	 FDID Record is rejected because an associated Customer Record was rejected Multiple active roles for Customer within fdidCustomerList Missing ADDRESS1 type Address Record Missing or Invalid city No Customer association with trading capabilities
Customer	 Customer Record rejected because an associated FDID was rejected Multiple instances of Customer with differing data Missing or Invalid format of yearOfBirth Legal Entity CAT Customer reported with improper tidType Missing or invalid lastName

Open Issues, Planned Enhancements, and Specification Updates

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production/Production Mirror Environments Targeted Release Date/Workaround	Area Affected
1	Open	N/A	Intermittent instances where rejections, inconsistencies details and repair credit may be incomplete on the reporter portal screens. Rejections and Inconsistencies details are being delivered via feedback files. Any rejections and repairs made for data submitted after these dates will be accurately reflected on the rejections screen. Users may still encounter this issue for prior rejections.	Code Release	High	Go-forward Fix: 06/05/2023 Data Fix: TBD	Go-Forward Fix: 06/26/2023 Data Fix: TBD	Reporter Portal
2	Updated- Open	Multiple	An attempt to resolve certain errors may incorrectly generate additional erroneous rejections and/or warnings.	Code Release	High	Go-forward Fix: TBD Data Fix: TBD	Go-Forward Fix: TBD Data Fix: TBD	Data Validation
3	New- Open	N/A	Intermittent instances where FDID Reconciliation Report may return stale information. Users may still encounter this issue for prior submissions.	Code Release	High	Go-forward Fix: 6/05/2023 Data Fix: TBD	Go-forward Fix: 6/26/2023 Data Fix: TBD	Reports
4	Open	30003, 30004, 22503,	An attempt to resolve a material inconsistency may incorrectly generate additional erroneous rejections and/or inconsistencies. FINRA CAT has temporarily disabled the Material Inconsistency and related updateNotification validations.	Code Release	-	Deployed: 01/16/2023 Workaround/Guidance: 1. Industry Members may ignore the outstanding Material Inconsistency Errors. 2. Industry Members may resubmit the FDID Record (with all LTID and Customer associations) in order to repair the rejections.	Deployed: 01/23/2023 Workaround/Guidance: 1. Industry Members may ignore the outstanding Material Inconsistency Errors. 2. Industry Members may resubmit the FDID Record (with all LTID and Customer associations) in order to repair the rejections.	Data Validation

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production/Production Mirror Environments Targeted Release Date/Workaround	Area Affected
5	Updated- Open	N/A	Intermittent issues with filtering results on rejections and inconsistencies.	Code Release	High	Fix : 9/25/2023	Fix : 10/23/2023	Reporter Portal
6	Open	N/A	Files containing more than 6 Million total records (FDIDs + CAT Customers) may not return feedback in the times specified within the Full CAIS Technical Specifications.	Code Release	Medium	Fix : TBD	Fix : TBD	Feedback Files
7	Open		Intermittent instances where the Submissions Report is displaying incorrect outstanding counts for rejections and inconsistencies.	Code Release	Medium	Inconsistencies Fix: 10/31/2022 Rejections Fix: TBD	Inconsistencies Fix: 11/7/22 Rejections Fix: TBD	Reporter Portal
8	Open	,	Use of the Manual Submission within the Reporter Portal UI does not currently allow a user to enter extended text characters properly for the <i>accountName</i> field. Submission of extended text characters in the field via SFTP or upload of files within the Reporter Portal does allow for the extended text properly.	Code Release	Low	Fix : TBD	Fix : TBD	Reporter Portal

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production/Production Mirror Environments Targeted Release Date/Workaround	Area Affected
9	Updated- Open	N/A	In instances when an attempt to repair is also rejected, the user can now filter for error identification dates, and the feedback will match the rejections on the reporter portal screen. However, the downloaded CSV file still displays the original error identification date or original submission ID for all the new rejections.	Code Release	Medium	Filter Fix: 1/16/23 Download Fix: 9/25/2023	Filter Fix: 1/23/23 Download Fix: 10/23/2023	Reporter Portal
10	Updated- Open	N/A	Instances when an error occurs for a customer record where the same CAT customer is reported with multiple <i>customerRecordID</i> values, SFTP feedback will include only one of the <i>customerRecordIDs</i> . The portal feedback displays all <i>customerRecordIDs</i> related to the error.	Code Release	Medium	Fix: 9/25/2023 Specification Update: 8/2/2023	Fix: 10/23/2023 Specification Update: 8/2/23	Feedback Files
11	Updated- Open	N/A	In limited instances, for dates 9/22/22 and 9/23/22, impacted inconsistencies were erroneously duplicated for the same Customer. Resolving one of them using the <i>updateNotification</i> does not resolve all of the Customer's outstanding Inconsistencies.	Data Fix	Low	Fix: N/A	Fix: TBD	Reporter Portal
12	Updated- Open	24001, 24005	Correction attempt with a <i>rejectionID</i> unknown to CAIS generates an incorrect warning of 24005 instead of 24001.	Code Release	Low	Fix: TBD	Fix: TBD	Data Validation

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

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production/Production Mirror Environments Targeted Release Date/Workaround	Area Affected
13	Open	30002, 30003, 30004	Intermittent instances where the CAIS system incorrectly generates subsequent nightly inconsistencies on customer records that have already been resolved with a prior submission.	Code Release	Low	Fix: TBD	Fix: TBD	Data Validation
14	Updated- Open	N/A	User is unable to filter on the submission date due to submission timestamp available in UTC format.	Code Release	Low	Fix: 9/25/2023	Fix: 10/23/2023	Reporter Portal
15	Updated- Open	22523	Prior to 10/2/2022: Limited instances where Customer Records properly rejected with Error Code 22900 also erroneously received Error Code 22523. The 22523 rejection are currently unrepairable.	Code Release	Medium	Fix: N/A	Go-forward Fix: 10/3/2022 Data Fix: TBD	Data Validation
16	New- Open	22523	Starting on 10/3/2022: Properly rejected Customer Records also erroneously receive Error Code 22523. Repair of the valid rejection will repair the 22523 rejection.	Code Release	Medium	Fix : 9/25/2023	Fix: 10/23/2023	Data Validation
17	Open	22034	Incorrectly generating error code 22034 (Data type violation – FDID) when submitting records with a branchOfficeCRD or registeredRepCRD using the Manual Submission Form.	Code Release	Low	Fix: TBD	Fix: TBD	Data Validation

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production/Production Mirror Environments Targeted Release Date/Workaround	Area Affected
18	Open	N/A	Intermittent instances of rejection and inconsistency repairs not being properly reflected in the submissions report. Any rejections and repairs made for data submitted after these dates will be accurately reflected on the rejections screen. Users may still encounter this issue for prior rejections.	Code Release	Medium	Go-forward Fix: 06/05/2023 Data Fix : TBD	Go-forward Fix: 06/26/2023 Data Fix: TBD	Reporter Portal
19	Open	30004	Intermittent instances of incorrectly generating inconsistency code 30004 when the <i>Type</i> is not Foreign.	Code Release	Low	Fix: TBD	Fix: TBD	Inconsistencies
20	Open	N/A	Incorrectly accepting submissions that include an Extended Text character and/or a prohibited delimiter in the <i>postalCode</i> field. These submissions should reject with a 22034 or 22522 error. Prohibited delimiters for Text fields are comma, pipe, double quote, and the '@' symbol.	Code Release	Low	Fix: TBD	Fix: TBD	Data Validation
21	Open	N/A	Limited instances where one of the TIDS feedback versions is missing. Processing of the corresponding data files is not impacted by this issue.	Code Release	Low	Fix: TBD	Fix: TBD	Feedback
22	Open	22042	Erroneously generating Error Code 22042 in instances where a single Customer is identified in the fdidCustomerList twice with roles that start and end on the same day, and the ended role is not listed first within the fdidCustomerList.	Code Release		Fix: TBD Workaround: Within the fdidCustomerList, list the Customer's ended role first and the active role second.	Fix: TBD Workaround: Within the <i>fdidCustomerList</i> , list the Customer's ended role first and the active role second.	Data Validation

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production/Production Mirror Environments Targeted Release Date/Workaround	Area Affected
23	Open	22071	Erroneously accepting FDID Records with multiple Customers where at least one active Customer has a <i>role</i> indicating no trading capabilities (e.g., NTHOLDER) and at least one Customer with a <i>role</i> indicating trading capabilities (e.g., <i>role</i> of 'AUTHREP' and <i>hasDiscretion</i> is 'true') is no longer active (i.e., <i>roleEndDate</i> is populated with a current or past date). These records should be rejected with Error Code 22071.	Code Release	Medium	TBD	TBD	Data Validation
24	New- Open	22528	For rejections with Error Code 22528, while the Customer Record rejection is provided in the feedback file, the FDID Record associated to the rejected Customer Record is erroneously not provided in the feedback file. The FDID Record should be rejected with Error Code 22048. In addition, Customer Records rejected with Error Code 22528 are erroneously counted as both Accepted and Rejected in the Submission Report on the portal.	Code Release	Medium	Fix : 9/25/2023	Fix: 10/23/2023	Data Validation

CAT Full CAIS Recently Closed Issues List As of 8/02/2023

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production/Production Mirror Environments Targeted Release Date/Workaround	Area Affected
1	Closed	N/A	Duplicate rows are present in the downloaded file when downloading the Rejections table from the Reporter UI.	Code Release	Low	Fix: 06/05/2023	Fix : 06/26/2023	Reporter UI
2	Closed		Incorrectly generating Error code 22526 (customerRecordID not present in paired Identifiers file) instead of 22914 when the Paired TID Record fails validation.	Code Release	Medium	Fix: 06/05/2023	Fix : 06/26/2023	Data Validation
3	Closed	N/A	Rejection feedback and material inconsistences for files submitted as of 11/21/22 are currently unavailable in the CAT CAIS Industry Test environment reporter portal. This feedback is available via SFTP.	Data Fix	High	Fix: 06/05/2023	Fix: N/A	Reporter Portal
4	Closed	N/A	Resolved rejections and inconsistencies continue to be displayed on the screens even after 10 days of complete resolution.	Code Release	Low	Fix: 06/05/2023	Fix: 06/26/2023	Reporter Portal
5	Closed		Rejection feedback does not include the FDIDs being rejected in instances when the <i>ItidEffectiveDate</i> and/or <i>ItidEndDate</i> values are missing or not properly formatted. In such scenarios the customer record is rejected with the error code 22523 (Customer Record rejected because an associated FDID was Rejected).	Code Release	Medium	Fix: 06/05/2023	Fix : 06/26/2023	Data Validation
6	Closed	N/A	Intermittent instances where Rejections and Inconsistencies may result in an incomplete CSV download error or an error that prevents the file from downloading.	Code Release	High	Fix : 06/05/2023	Fix : 06/26/2023	Reporter Portal

CAT Full CAIS Recently Closed Issues List As of 8/02/2023

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production/Production Mirror Environments Targeted Release Date/Workaround	Area Affected
7	Closed	Multiple	Incorrectly rejecting extended text data type fields when the field includes limited set of printable ASCII characters on extended range. UPDATE: Clarify in the Specification that certain ASCII characters in the extended range are not printable after UTF-8 encoding.	Specification Update	Low	Specification Update: 8/2/2023	Specification Update: 8/2/2023	Data Validation
8	Closed	N/A	When a filter has been applied to the Rejections table, the CSV file downloaded includes all records in the table rather than only filtered records. UPDATE: This is expected behavior so that the Industry Member can view the historical lineage of each rejection.	User Guide Update	Low	Update the CAIS Reporter Portal User Guide	Update the CAIS Reporter Portal User Guide	Reporter Portal
9	Closed	N/A	The customerRejectionEventID conditional attribute within the CAIS Data Feedback File is not present for rejections against customer records. This field is displayed on the reporter portal as a 'Text' rather than 'Unsigned'.	Specification Update	Low	Specification Update: 8/2/2023	Specification Update: 8/2/2023	Feedback Files Reporter Portal
10	Closed	N/A	FDID Version Report includes FDIDs that have been previously ended.	Retirement	Low	Report will be retired effective 9/2023	Report will be retired effective 9/2023	Reports

CAT CAIS Planned Enhancements - Open

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date	Production/Production Mirror Environments 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: TBD	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: TBD	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: N/A	Reporter Portal

CAT CAIS Planned Enhancements - Recently Closed

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

Full CAIS Technical Specifications

- ▶ Version 2.0 r10 was published on August 2, 2023
- Overview of revisions:
 - Clarifications requested by the industry
 - Include other items from the Known Issues list, Planned Spec Updates list, TSWGs and other published guidance
 - Other General Updates
 - No schema changes other than those previously announced.

CAT CAISPlanned Full CAIS Phase Specification Updates

#	Status	Summary	Publish Date	Spec Version	Effective Date - Test	Effective Date – Prod/Prod Mirror
1	UPDATED- Open	Add a new <i>fdidEndReason</i> value of 'INACTIVE' and clarify in Section 3.8 that 'INACTIVE' will be available prior to the periodic full account refresh requirement.	8/2/2023	2.0 r10	9/25/23	10/23/23

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

General Announcements and Reminders

Other CAIS Updates

- ▶ The following were published to the CAT website on August 2, 2023:
 - Updated <u>CAT Alert 2022-01: Full CAIS Reporting Timeline and Interim Reporting</u>
 <u>Obligations</u> to note that the details regarding Interim Reporting Obligation 4 and the Full CAIS Compliance Go-Live deadlines have been superseded and can be found in new CAT Alert 2023-01
 - Thirteen total updated <u>FAQs</u> in Section M (Firm Designated ID) and Section Q
 (Customer and Account Information) to include reference to new CAT Alert 2023-01
 - Updated <u>Timeline</u> with the Interim Reporting Obligation 4 and the Full CAIS Compliance Go-Live deadlines
 - An <u>Announcement</u> regarding the Interim Reporting Obligation 4 and Full CAIS Compliance Go-Live deadlines
 - Updated <u>Industry Member CAIS Onboarding Guide</u>

FINRA CAT Announcements and Reminders

- ➤ The next CAT CAIS Checkpoint call will be on Wednesday, September 6, 2023, at 4:15 pm ET.
- 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 —

Industry Test Environment										
	Monday, 7/24	Tuesday, 7/25	Wednesday, 7/26	Thursday, 7/27	Friday, 7/28	Saturday, 7/29	Sunday, 7/30			
Number of Total Submitters	17	25	23	19	17	0	5			
Number of Unique Firms	61	218	226	247	186	0	99			
Number of Files Received	Total: 235 Reporter Portal: 1 SFTP: 234	Total: 671 Reporter Portal: 6 SFTP: 665	Total: 619 Reporter Portal: 2 SFTP: 617	Total: 631 Reporter Portal: 0 SFTP: 631	Total: 628 Reporter Portal: 4 SFTP: 624	Total: 0 Reporter Portal: 0 SFTP: 0	Total: 186 Reporter Portal: 2 SFTP: 184			
Number of Files Rejected	39	96	48	12	11	0	2			
File Reject Rate	16.60%	14.31%	7.75%	1.90%	1.75%	0.00%	1.08%			

Industry Test Environment										
	Monday, 7/24	Tuesday, 7/25	Wednesday, 7/26	Thursday, 7/27	Friday, 7/28	Saturday, 7/29	Sunday, 7/30			
FDID Records Accepted	207,612	266,721	579,896	200,377	443,739	0	37,000			
FDID Records Rejected	12,295	12,268	29,822	28,401	31,435	0	1,131			
FDID Records Submitted	219,907	278,989	7,981	228,778	475,174	0	38,131			
FDID Record Rejection Rate	5.59%	4.40%	4.89%	12.41%	6.62%	0.00%	2.97%			

Industry Test Environment										
	Monday, 7/24 Tuesday, 7/25		Wednesday, 7/26	Thursday, 7/27	Friday, 7/28	Saturday, 7/29	Sunday, 7/30			
Customer Records Accepted	213,445	164,924	142,358	222,918	214,165	0	55,047			
Customer Records Rejected	13,611	8,464	7,981	29,222	15,356	0	1,813			
Customer Records Submitted	227,056	173,388	150,339	252,140	229,521	0	56,860			
Customer Record Rejection Rate	5.99%	4.88%	5.31%	11.59%	6.69%	0.00%	3.19%			