Consolidated Audit Trail

CAIS Technical Specifications Working Group

August 22, 2023

Version 2.0 r10 Revisions

▸ Version 2.0 r10 was published on August 2, 2023

▸ Revisions include:

1. Clarifications requested by the industry

2. Items from the Known Issues list, Planned Spec Updates list, TSWGs and other published guidance

3. Other General Updates

Clarifications Requested by the Industry

▸ Added additional details and clarifications to:
- ◦ Section 1 – Introduction
- ◦ Section 2 – CAT Customer & Account Reporting Fundamentals
- ◦ Section 3 – Special Reporting Requirements
- ◦ Section 4 – CAIS Reporting
- ◦ Section 5 – Submission Process
- ◦ Section 6 – Feedback and Corrections
- ◦ Section 7 – Impacted Inconsistencies Feedback
- ◦ Appendix B: Error Codes

Section 1 Highlights

‣ Section 1 – Introduction

◦ Provided an overview of FDIDs and Customers that are in scope for Full CAIS Reporting and an explanation of linkage between CAIS and Transaction

Section 2 Highlights

▶ Section 2 – CAT Customer & Account Reporting Fundamentals

◦ Drew a direct connection between concepts and the field name (for example a "Customer Record ID" value is populated in the *customerRecordID* field)

◦ Clarified when and how to populate *correspondentCRD* ([9/20/22 CAIS TSWG](#))

◦ Provided additional detail and clarified the Material Inconsistencies procedure and resolution process ([8/3/22 Material Inconsistencies](#))

Section 3 Highlights

▸ Section 3 – Special Reporting Requirements

◦ Provided additional detail and clarified the procedure for Replacement of Transformed Identifier (TID) ([10/18/22 CAIS TSWG](#))

◦ Provided additional detail and clarified the procedure for Translation of Input Identifiers to TID Values ([4/12/22 CAIS TSWG](#))

◦ Provided additional detail and clarified how to report multiple versions of the same CAT Customer within a single file
  • Introduced new terms: "Option 1 reporting" vs. "Option 2 reporting"

◦ Added new Section 3.14 – Special Rules for Clearing Firms

Section 4 Highlights

▶ Section 4 – CAIS Reporting

  ◦ Updated field Descriptions in Table 6: CAIS Data File and Table 7: Transformed Identifiers File

    • Updated Appendix D to conform with changes in Tables 6 and 7

  ◦ Conformed with the [8/16/22 CAIS TSWG](#):

    • *roleEndReason* value of 'ENDED' is to be used when a Customer was reported with an incorrect *role* (for example, 'AUTH3RD' rather than 'AUTHREP').

    • "End Reason" values of 'TRANSFER' are only to be used in Mass Transfer scenarios as described in Section 3.3 – Mass Transfers of FDIDs across Industry Members.

Section 5 Highlights

▶ Section 5 – Submission Process

◦ Updated field Descriptions in Table 8: Elements of a File Submission Name

◦ Clarified Rules:
- Rule 24 and Rule 33 in Section 5.1.3.1 – CAIS Data File Submission –FDID

◦ Added New Rules:
- Rule 38 to Section 5.1.3.1 – CAIS Data File Submission –FDID
- Rule 15 and Rule 16 to Section 5.1.3.2 – CAIS Data File Submission – Customer
- Rule 9 to Section 5.1.4. – Transformed Identifiers Data File Submission

◦ Added Table 13: Error Repair Deadline Examples ([5/4/21 CAIS TSWG])

Section 6 Highlights

▸ Section 6 – Feedback and Corrections

 ◦ Add new Section 6.7 – FDID Reconciliation Report

 ◦ Added Tables:
   • Table 17: CAIS Data Feedback File Versions
   • Table 18: Transformed Identifiers Feedback File Versions
   • Table 19: Triggered Inconsistencies Feedback File Version

 ◦ Updated field Descriptions in:
   • Table 20: Elements of a CAIS Data Feedback File
   • Table 21: Elements of a Transformed Identifiers Feedback File
   • Table 22: Elements of a Triggered Inconsistencies Feedback File

Section 7 Highlights

▶ Section 7 – Impacted Inconsistencies Feedback

  ◦ Updated field Descriptions in Table 23: Elements of an Impacted Inconsistencies Feedback File

Appendix B Highlights

▶ Appendix B: Error Codes

◦ Clarified error code Explanations in
  - Table 24: CAIS Data File Integrity Errors
  - Table 25: Transformed Identifiers File Integrity Errors
  - Table 26: Data Validation Errors

◦ Clarified error code Descriptions to differentiate if the error is on the FDID level or Customer level:
  - Table 26: Data Validation Errors

◦ Updated error code Explanations:
  - Error Codes 22534; 22535; 22541; and 22542
    - If the Industry Member erroneously reported a Customer with an incorrect *tidType* or *foreignTIDType* the rejection is currently unrepairable (planned enhancement)
  - Error Codes 24904 and 24910
    - *(replacing)/foreignTIDCountryCd* must not be 'US' when *tidType* is 'FOREIGN'.

Conform to Other Published Guidance

▸ Planned Spec Updates

▸ Known Issues

▸ Updated references to the Full CAIS Compliance Dates

▸ Release Dates

▸ Included guidance from FAQs

Other General Updates

▶ Removed references to the "Automated Transfer Procedure" from Section 3.3 – Mass Transfer of FDIDs across Industry Members

  ◦ Retired Error Code 21020

▶ Revised the JSON examples

  ◦ Section 5.1.5 – Paired CAIS Data File and Transformed Identifiers File JSON Example
  ◦ Section 6 – Feedback and Corrections
  ◦ Section 7 – Impacted Inconsistencies Feedback

▶ Added a new JSON example in Section 6 – Feedback and Corrections to illustrate a "v4" feedback file

▶ Retired Error Code 22070 (FDID previously submitted in v2.0.0 file)

▶ Added Error Codes 22076 and 22077 (Invalid use of 'INACTIVE' End Reason)

Other General Updates

▸ Table 21: Elements of a Transformed Identifiers Feedback File:

  ◦ When populated, *rejectionID* is always set to 'null' in the Transformed Identifiers File Feedback

▸ Table 23: Elements of an Impacted Inconsistencies Feedback File:

  ◦ *inconsistencyList, inconsistencyDeadline* and *materialInconsistencies* are Required fields

Other General Updates

▸ Bifurcated Section 2.2.5 into new Sections: 2.2.5.1 – U.S. Tax Identifiers and 2.2.5.2 – Foreign Identifiers

▸ Added new Section 2.2.8 – Customer Record ID

▸ New Section Levels:
  ◦ Section 2.3 – CAT CAIS Architecture
  ◦ Section 2.4 – Data Inconsistency

▸ Removed Section 2.2.10 – Reportable Identifier

Other General Updates

▶ Rules were added to Sections:

◦ 5.1.1 – File Submission Names

◦ Added Rule 3 and Rule 7 to Section 7 – Impacted Inconsistencies Feedback

◦ Bifurcated Rule 1 into Rule 1 and Rule 2 in Section 7 – Impacted Inconsistencies Feedback

▶ Deleted Rules:

◦ Rule 8 from Section 7 – Impacted Inconsistencies Feedback

◦ Deleted Rule 3 (and Table 20) from Section 7.1.1. – Data Inconsistencies Feedback File Names

Other General Updates

▸ Deleted Table 3: Customer Data Inconsistencies and moved relevant information to the appropriate sections

▸ Moved Table 4: Triggered Inconsistencies and Table 5: Impacted Inconsistencies to Section 5.4.3 – Deadline for Resolving Inconsistencies Identified by CAT CAIS

▸ Renamed and/or renumbered some Sections and Tables

▸ Removed references to expired or temporary guidance

▸ Conformed terminology throughout

▸ Corrected typos throughout

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