



# **FINRA CAT Industry Member Onboarding Guide**

3/7/2024

Version 1.24

<b>Change Log.....</b>	<b>3</b>
<b>Introduction .....</b>	<b>8</b>
<b>Onboarding Overview .....</b>	<b>9</b>
<b>Companion Resources .....</b>	<b>10</b>
<b>Operating System Requirements for Accessing CAT Applications .....</b>	<b>11</b>
<b>1. Register for CAT .....</b>	<b>12</b>
<b>2. Submit the CAT Reporter Agreement.....</b>	<b>14</b>
<b>3. Designate Account Administrators .....</b>	<b>15</b>
<b>4. Create / Entitle CAT User Accounts for the CAT Reporter Portal .....</b>	<b>17</b>
<b>5. Request Secure File Transfer Accounts .....</b>	<b>26</b>
<b>6. Manage Connectivity.....</b>	<b>28</b>
<b>7. Manage Multi-Factor Authentication (MFA).....</b>	<b>29</b>
<b>8. Establish CAT Reporting Relationships in the Test Environment .....</b>	<b>48</b>
<b>9. Establish ATS Order Types in the Test Environment.....</b>	<b>49</b>
<b>10. Conduct Testing for Production Readiness .....</b>	<b>50</b>
<b>11. Certification of Testing Completion .....</b>	<b>53</b>
<b>12. CAT Contact Management System .....</b>	<b>54</b>
<b>13. CAT Billing .....</b>	<b>55</b>

## Change Log

Version	Date Published	Description of Change(s)
1.0	7/31/2019	Guide initially published on the CAT NMS web site.
1.1	8/7/2019	<ul style="list-style-type: none"> <li>Section 4 has been updated to reflect that SAAs and AAs can grant entitlements to the Reporter Portal beginning on September 9, 2019, rather than the previously indicated August 30, 2019.</li> <li>A change Log has been added to the document.</li> </ul>
1.2	8/16/2019	<ul style="list-style-type: none"> <li>A link to the FINRA CAT Connectivity Supplement for Industry Members has been added to Companion Documents</li> <li>Section 6 has been updated to reflect publication of the FINRA CAT Connectivity Supplement for Industry Members</li> </ul>
1.3	11/04/2019	<ul style="list-style-type: none"> <li>Multi-factor authentication information has been added as Section 7</li> <li>Added links to CAT Reporter Agreement location in Section 2</li> <li>Updated the link in the Companion Documents to point to latest CAT Connectivity Supplement</li> </ul>
1.4	12/6/2019	<ul style="list-style-type: none"> <li>Additional requirements regarding the expiration of temporary passwords for new accounts has been added to Section 4.</li> <li>Added link for CAT Reporter Portal User Guide</li> </ul>
1.5	12/17/2019	<ul style="list-style-type: none"> <li>Changes to Overview, Sections 2 and 10 to describe the option of the Industry Member Limited Testing Acknowledgement Form.</li> </ul>
1.6	1/14/2020	<ul style="list-style-type: none"> <li>Added security token information and links to test environments in Section 7</li> <li>Updated the link in the Companion Documents to point to the latest publication of the FINRA CAT Connectivity Supplement for Industry Members</li> </ul>
1.7	3/12/2020	<ul style="list-style-type: none"> <li>Added Duo country prohibition in Section 7.</li> </ul>
1.8	3/31/2020	<ul style="list-style-type: none"> <li>Updated Section 11 with new Production Readiness Certification Requirements for CRAs.</li> </ul>

1.9	4/15/2020	<ul style="list-style-type: none"> <li>• Provided instructions for adding a device for the Duo MFA service.</li> <li>• Made trivial modifications to Section 7 for consistency.</li> </ul>
1.10	5/18/2020	<ul style="list-style-type: none"> <li>• Updated Section 7 Duo MFA instructions to: <ul style="list-style-type: none"> <li>○ Indicate that CAT will no longer allow the use of passcode entry from the Duo app.</li> <li>○ Refer to new “last login” info presented during login.</li> <li>○ Provide instructions for reactivating a replaced device and managing device settings.</li> <li>○ Streamline duplicative content.</li> </ul> </li> <li>• Updated Companion Documents to provide additional details and links to redesigned CAT NMS website.</li> <li>• Updated Reporting Relationships and ATS Order types sections to refer to the Industry Member CAT Reporter Portal User Guide.</li> <li>• Updated guide throughout to remove references to “future dates” that have now passed.</li> <li>• Updated Industry Member Compliance Dates in Section 11 to match new timeline.</li> <li>• Removed references to the Limited Testing Acknowledgement Form to align with requirement to submit the CAT Reporting Agreement in order to access the Industry Test environment.</li> </ul>
1.11	5/28/2020	<ul style="list-style-type: none"> <li>• Added Section 10.4 to provide Production Readiness steps for IMs that do not have production data prior to the certification deadline.</li> </ul>
1.12	6/3/2020	<ul style="list-style-type: none"> <li>• Updated Section 7.2 to reflect removal of double sign-in for users accessing the Reporter Portal via SRG.</li> </ul>
1.13	06/30/2020	<ul style="list-style-type: none"> <li>• Updated Sections 4 and 5 to reflect the splitting of Industry Test and Production entitlements and access.</li> </ul>

		<ul style="list-style-type: none"> <li>Updated Section 4.3 to change required timeframe to complete user account onboarding steps from 5 days to 10 days.</li> </ul>
1.14	08/17/2020	<ul style="list-style-type: none"> <li>Updated Onboarding Overview and Companion Documents to reflect the introduction of the Customer and Account Information System (CAIS).</li> <li>Updated Section 4 to remove information about the transition to the splitting of TEST and PROD entitlement access that occurred in July.</li> <li>Update Section 5 to clarify TEST and PROD entitlement access for SFTP accounts.</li> </ul>
1.15	9/22/2020	<ul style="list-style-type: none"> <li>Added Operating System Requirements for Accessing CAT Applications.</li> <li>Updated Section 6 Connectivity to include reminder about end-of-life operating system requirements (effective December 7, 2020).</li> </ul>
1.16	11/4/2020	<ul style="list-style-type: none"> <li>Updated Section 1 Register for CAT to include the collection of the Legal Entity Identifier (LEI).</li> </ul>
1.17	12/21/2020	<ul style="list-style-type: none"> <li>Updated the following to reflect availability of the Production Mirror environment: <ul style="list-style-type: none"> <li>Section 4.1: CAT System Environments</li> <li>Section 5.1: Request Secure File Transfer Accounts</li> <li>Section 10: Conduct Testing for Production Readiness</li> </ul> </li> <li>Removed outdated reference to duplicate entry of username and password in Section 7: Manage Multi-Factor Authentication (MFA).</li> <li>Updated URLs for Companion Documents to reflect changes to CAT NMS website.</li> </ul>
1.18	6/2/2021	<ul style="list-style-type: none"> <li>Updated screen shots throughout to reflect updated look and feel of login process.</li> </ul>
1.19	7/23/2021	<ul style="list-style-type: none"> <li>Section 4 updated throughout to reflect the new Account Management System process.</li> </ul>

		<ul style="list-style-type: none"> <li>• Update URLs throughout to reflect changes to FINRA.org and catnmlsplan.com websites.</li> </ul>
1.20	1/26/2022	<ul style="list-style-type: none"> <li>• Updated list of Prohibited Countries in Section 7.</li> </ul>
1.21	3/14/2022	<ul style="list-style-type: none"> <li>• Updated browser requirements in Section 6 for clarity.</li> <li>• Added information about the handling of dormant user accounts.</li> <li>• Consolidated Prohibited Countries list in Section 7.</li> </ul>
1.22	10/12/2023	<ul style="list-style-type: none"> <li>• Added CAT Contact Management System and CAT Invoice Viewer to Overview.</li> <li>• Clarify/Revise Section 1 to conform with changes CAT Registration Form, including removal of OATS-related question.</li> <li>• Updated Section 4.2 CAT Reporter Portal User Types to include new CAT Portal IM View/Edit Contact User role for CAT Contact Management System, a new CAT Portal IM View Invoice role for the CAT Invoice Viewer, and new entitlements for other roles.</li> <li>• Removed references to ATS Order Types in OATS in Sections 8 and 9.</li> <li>• Removed Table 1: Production Readiness Error Rates regarding legacy Production Readiness Testing and Certification criteria.</li> <li>• Added Section 12: CAT Contact Management System.</li> <li>• Added Section 13: CAT Invoice Viewer.</li> <li>• Updated guide throughout to remove references to “future dates” that have now passed.</li> <li>• Updated FINRA Entitlement links throughout document.</li> <li>• Removed Metadata File submission references throughout document.</li> </ul>
1.23	11/30/2023	<ul style="list-style-type: none"> <li>• Added user privileges to Sections 4.2.1: CAT Account Administrator and 4.2.5: CAT Portal IM View Invoice User.</li> </ul>

		<ul style="list-style-type: none"> <li>• Bifurcated Section 5: Request Secure File Transfer Accounts, into Section 5.1.1: Transaction Data and added new Section 5.1.2: CAT Billing Trade Details.</li> <li>• Added introduction to Section 5.2: CAT Secure File Transfer Account Types, and added information on SFTP entitlements and SFTP access to CAT Billing Trade Details.</li> <li>• Added information on Invoice Viewer Functionality and CAT Executing Brokers to Section 13: CAT Billing.</li> </ul>
1.24	3/7/2024	<ul style="list-style-type: none"> <li>• Added information on registration form processing time and SAA notification to Section 1: Register for CAT.</li> <li>• Updated Section 7: Manage Multi-Factor Authentication (MFA) and information related to enrollment, log-in, and device management with additional details and new screenshots.</li> </ul>

## Introduction

Rule 613 of the Securities Exchange Act of 1934 requires national securities exchanges and national securities associations (“SROs”) to submit a national market system plan to the Securities and Exchange Commission (“Commission” or “SEC”) to create, implement, and maintain a consolidated audit trail (the “CAT”) that would allow regulators to more efficiently and accurately track all activity in U.S. equity and listed options markets. Pursuant to Rule 613, the SROs filed with the Commission the National Market System Plan Governing the Consolidated Audit Trail (“CAT NMS Plan”), which was approved by the Commission on November 15, 2016.

Under Rule 613(g)(2), each member of a national securities exchange or national securities association is required to comply with all the provisions of the CAT NMS Plan. Relatedly, as mandated under Rule 613, the CAT NMS Plan requires each SRO to adopt rules requiring its members to comply with Rule 613 and the CAT NMS Plan, and to agree to enforce compliance by its members in that regard. Accordingly, each SRO has adopted rules requiring its members to comply with Rule 613 and the CAT NMS Plan. For example, see FINRA Rule 6800 Series.

The SROs jointly own Consolidated Audit Trail, LLC, which was formed by the SROs to arrange for and oversee the creation, implementation, and maintenance of the CAT as required under Rule 613. Thus, the CAT is a facility of each SRO.

For more information, refer to SEC Rule 613 at <https://www.sec.gov/rules/final/2012/34-67457.pdf> and the CAT NMS Plan at <https://www.catnmsplan.com/wp-content/uploads/2018/02/34-79318-exhibit-a.pdf>.

## Onboarding Overview

The FINRA CAT Onboarding Guide provides information for Industry Members and CAT Reporting Agents (CRA) on how to gain access to the CAT Test, Production Mirror, and Production Environments for Transaction reporting for the first time. Industry Members that report to CAT on their own behalf (self-reporting) or on behalf of another Industry Member and CAT Reporting Agents that report to CAT on behalf of Industry Members must complete the following steps to gain access to CAT, including:

- 1) Register for CAT
- 2) Submit the CAT Reporter Agreement
- 3) Designate Account Administrators
- 4) Create / Entitle CAT User Accounts for the CAT Reporter Portal
- 5) Request CAT Secure File Transfer Accounts, if applicable
- 6) Manage Connectivity
- 7) Enroll in Multi-Factor Authentication
- 8) Establish CAT Reporting Relationships in the Test Environment, if applicable
- 9) Establish ATS Order Types in the Test Environment (if applicable), if applicable
- 10) Conduct Testing for Production Readiness
- 11) Certify Testing Completion
- 12) CAT Contact Management System
- 13) CAT Billing

This document provides instructions for completing each of these steps, as well as additional resources and information. Upon completion of these steps, access to the CAT Production Environment will be authorized.

**A separate Industry Member Onboarding guide that provides the steps for gaining access to the CAT Customer and Account Information System (CAIS) and to the CAT Reporter Portal – CAIS is available on the [CAIS Registration & Onboarding Page](#) of the CAT NMS Plan [website](#). It is assumed that CAIS onboarding will be done in conjunction with or following CAT Transaction onboarding described in this document.**

### Questions

Questions related to this document may be directed to the FINRA CAT Helpdesk at 888-696-3348 or at [help@finracat.com](mailto:help@finracat.com).

## Companion Resources

- CAT Industry Member Reporting Scenarios: <https://www.catnmsplan.com/specifications/imreportingscenarios>
- CAT Reporting Technical Specifications for Industry Members: <https://www.catnmsplan.com/specifications/im>
- FINRA Gateway: <https://gateway.finra.org/app/ews-landing-page>
- Frequently Asked Questions: <https://www.catnmsplan.com/faq>
- CAT Registration: <https://www.finra.org/cat-registration>
- Entitlement Program Home Page: <https://www.finra.org/filing-reporting/entitlement>
- Entitlement Program Home Page for the New Account Management System: <https://www.finra.org/finra-accounts-system>
- Entitlement Reference Guide for the Account Management System: <https://www.finra.org/filing-reporting/entitlement/reference-guide>
- Quick Reference Information for Super Account Administrators: <https://www.finra.org/filing-reporting/entitlement/super-account-administrator-saa>
- Connectivity Guide: <https://www.catnmsplan.com/transaction-registration>
- Frequently Asked Questions: <https://www.catnmsplan.com/faq/index.html>
- CAIS Registration and Onboarding: <https://www.catnmsplan.com/cais-registration>
- Industry Member JSON Schemas: <https://www.catnmsplan.com/specifications/im>
- Reporter Portal User Guide: <https://www.catnmsplan.com/transaction-registration>

## Operating System Requirements for Accessing CAT Applications

For security purposes, CAT imposes minimum operating system requirements for accessing any CAT application. Specifically, no CAT application may be accessed using a device that is currently running on an “end-of-life” operating system. An end-of-life operating system means that the operating system vendor is no longer marketing, selling, supporting, or generally distributing security patches for that version of the operating system.

**Any device used for multi-factor authentication<sup>1</sup>** for a CAT application must be running an operating system that has not been deemed as “end-of-life” by the operating system vendor.

Users should consult their IT provider for more information related to end-of-life operating systems.

For questions, contact the FINRA CAT Helpdesk at 888-696-3348 or [help@finracat.com](mailto:help@finracat.com).

---

<sup>1</sup> See Section 7: Manage Multi-Factor Authentication (MFA) for details.

## 1. Register for CAT

Any member of a national securities exchange or national securities association that handles orders or quotes in NMS equity securities, OTC equity securities, or listed options and any CAT Reporting Agent that is or will be authorized to submit data to CAT on behalf of an Industry Member must register in order to report to the CAT system.

The CAT NMS Plan Registration Form must be submitted online at <https://www.catnmsplan.com/transaction-registration>.

The information collected on the registration form includes:

- Company Name (Primary Business Name and Organization Legal Name), Address, Type of Organization, CRD number (Industry Member) or ORG ID (Service Bureau)<sup>2</sup>, and Legal Entity Identifier (LEI)<sup>3</sup>
- Primary and Secondary Contact Name, Phone, Email
- Registered Principal Name, Phone, Email (Not Applicable to Service Bureaus)
- Primary and Secondary Source of CAT Reporting (Self-Reporting or Vendor)
- Preferred Connectivity (SFTP and/or CAT Reporter Portal)
- Type of Securities Traded (Equities and/or Options)
- Whether the firm qualifies as a Small Broker Dealer (Not Applicable to Service Bureaus)
- Default CAT Reporting IMID (Not Applicable to Service Bureaus)

The registration form will be processed within two business dates of receipt. The Super Account Administrator (SAA) will receive an email when the CAT registration form has been processed and the new entitlements have been added to its account. The SAA can then set up Account Administrators and provide other users access to the CAT Test and Production Mirror Environments.

---

<sup>2</sup> CAT Reporting Agents that do not have a CRD number must leave the CRD number blank when entering Company Information. An ID will be assigned once a CAT Agreement is submitted and an account is created for an Account Administrator. The ID will be provided by the FINRA Entitlement Team in the notification email alerting that Account Administrator access has been granted.

<sup>3</sup> See [FAQ A34](#) on the [CAT NMS Plan](#) website for additional information.

Industry Members may use any SRO-assigned identifier (e.g., a Market Participant Identifier) that is valid on the CAT Trading Day as the CAT Reporter IMID to report events for that day. However, each CAT Reporter must provide a Default CAT Reporting IMID during registration. If an Industry Member does not have an identifier assigned to them, they should request an identifier from their Designated Examining Authority (“DEA”).

A list of default CAT Reporting IMIDs will be published for use by other reporters to resolve unlinked records. See Section 4.4.1 of the [CAT Reporting Technical Specifications for Industry Members](#) for more information.

## **2. Submit the CAT Reporter Agreement**

In order to gain access to the Industry Test and Production environments, all organizations are required to submit the appropriate CAT Reporter Agreement.

### **2.1. Industry Members**

Industry Members must sign a *CAT Reporter Agreement* to access the Industry Test and Production environments. The CAT Reporter Agreement is available for electronic signature on the CAT NMS Web Site at <https://www.catnmsplan.com/transaction-registration>.

### **2.2. CAT Reporting Agents**

Organizations that are not members of any Plan Participant but report to CAT on behalf of Industry Members ("CAT Reporting Agents") must sign a *CAT Reporting Agent Agreement* to access the Industry Test and Production environments. The CAT Reporting Agent Agreement is available for electronic signature on the CAT NMS Web Site at <https://www.catnmsplan.com/transaction-registration>.

### 3. Designate Account Administrators

Access to CAT leverages the FINRA Entitlement Program that includes the Super Account Administrator (SAA) role for Industry Members and an Account Administrator (AA) role for CAT Reporting Agents (Service Providers). Refer to <http://www.finra.org/industry/entitlement-program> for additional information on the FINRA Entitlement Program.

#### 3.1. Request a Super Account Administrator (applicable to Industry Members only)

Industry Members must have a Super Account Administrator (“SAA”) to serve as the primary entitlement contact. Industry Members that have an SAA established with the FINRA Entitlement Program will use that SAA for CAT access; no further action is required. Upon submission and verification of the prerequisites, the SAA will be granted with the capability to provide CAT access to users and create Account Administrators to assist in maintaining user access to CAT.

Firms that do not have a FINRA SAA must complete the [New Organization SAA Entitlement Form](#) to designate an SAA and to authorize set up of this type of account. Once the new SAA form is verified and processed, the SAA will receive an email with log on credentials and have the capability to grant access to CAT and other FINRA systems.

To replace the SAA, contact the FINRA CAT Helpdesk at 888-696-3348 or at [help@finracat.com](mailto:help@finracat.com) to request an *Update/Replace SAA Form*. The form will be emailed to the Authorized Signatory who signed the form authorizing the former SAA.

An [SAA Reference Guide](#) that includes setting up Account Administrators and users and fulfilling other responsibilities of the role is available on FINRA.org.

#### 3.2. Designate CAT Account Administrators (applicable to Reporting Agents that are not a member of a Plan Participant)

CAT Reporting Agents that are not members of any Plan Participant but report to CAT on behalf of Industry Members must use a CAT Account Administrator (“CAT AA”) role to manage access to CAT. To designate a CAT AA, the organization must submit a [CAT Account Administrator Entitlement Form](#)<sup>4</sup> (“CAT AAEF”). An organization may designate more than one CAT AA by completing a form for each individual who will perform this role.

---

<sup>4</sup> CAT Reporting Agents that are not members of any Plan Participant must complete a CAT AAEF to designate a CAT AA.



To replace a CAT AA, use the CAT Account Administrator Entitlement Form and complete the applicable section. CAT AAs cannot create or edit their own accounts or the accounts of other CAT AAs. For help with their accounts, CAT AAs will need to contact the FINRA CAT Helpdesk at 888-696-3348 or [help@finracat.com](mailto:help@finracat.com).

## 4. Create / Entitle CAT User Accounts for the CAT Reporter Portal

Once an organization meets the prerequisites for access including: registering for CAT, submitting a CAT Reporter Agreement, and designating an Account Administrator, the FINRA Entitlement Team will grant access to the Super Account Administrators (“SAA”) or CAT Account Administrators (“CAT AA”) to the CAT Test Environment.

SAA's and CAT AA's for organizations that have met the prerequisites defined above have the ability to create user accounts and grant entitlement to the CAT Reporter Portal.

### 4.1. CAT System Environments

Three environments are available for CAT Reporters to access, as defined below:

Environment	Functionality	Data	Purpose
<b>Industry Test</b>	Functionality that is currently in the development and testing phase and has not yet been released to production.	Data submitted to the Industry Test environment by Plan Participants and Industry Members. <sup>5</sup>	User testing of new functionality.
<b>Production Mirror</b>	Full production-equivalent functionality.	<p>All data submitted by Plan Participants to the Production environment.</p> <p>All data submitted to the Production Mirror environment by Plan Participants and Industry Members.</p>	Allows for the submission of data to a production-equivalent environment. This may be used for production readiness testing and to test code enhancements or corrections prior to providing such data to the Production Environment.
<b>Production</b>	Full production functionality.	All data submitted to the Production environment by Plan Participants and Industry Members.	Provision of production data as required by the CAT NMS Plan.

<sup>5</sup> CAT will also validate that certain values reported in Transaction data are present in Customer and Account Information System (CAIS) based on data available in the CAIS Production Environment. See the CAT Reporting Technical Specifications for Industry Members for more information.

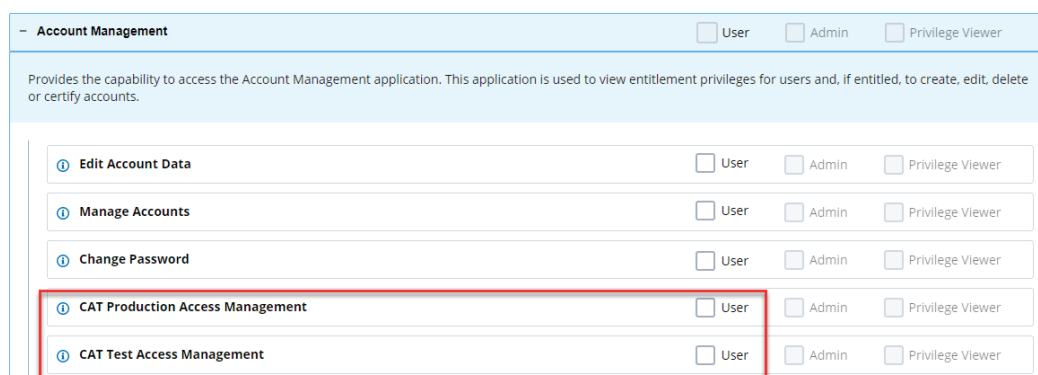
Each user account with entitlement to one or more CAT applications must have their CAT access set to Test (which includes both the Industry Test and Production Mirror environments), Production (Prod), or both. The CAT access setting determines whether the user can access an entitled system in the test environments, the production environment, or both. For example, a user with Reporter Portal entitlement and only CAT Test Access granted may access the Reporter Portal in Industry Test and Production Mirror; however, the user would not have access to the Portal in Production. Note that not all applications may not be available in the Production Mirror environment.

## CAT Super Account Administrators (SAAs)

The FINRA Entitlement Team will manage environment access for all SAAs. An SAA will be able to manage access to the test environments upon completion of the requirements outlined in [Section 1](#) and [Section 2](#). When a firm has completed all testing certification and is granted production access, per [Section 11: Certification of Testing Completion](#), the SAA will be given the ability to manage access to the production environment for their users.

## CAT Account Administrators (AAs) (as Access Managers)

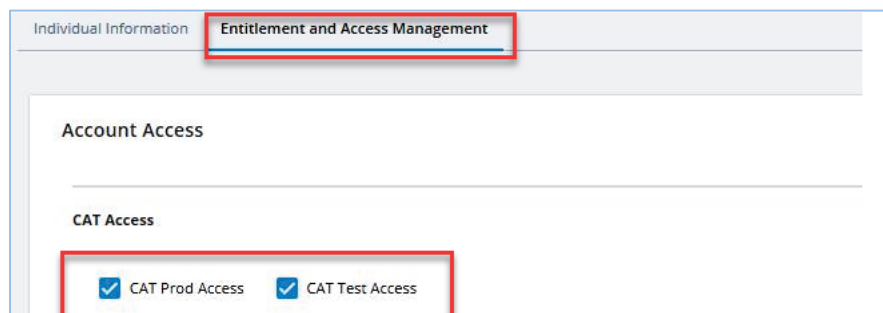
When creating or modifying an account for an **Account Administrator**, the SAA must indicate if the AA is able to grant and manage access to the test and/or production environments, as shown in the screen shot below.



- Account Management		<input type="checkbox"/> User	<input type="checkbox"/> Admin	<input type="checkbox"/> Privilege Viewer
Provides the capability to access the Account Management application. This application is used to view entitlement privileges for users and, if entitled, to create, edit, delete or certify accounts.				
1 Edit Account Data	<input type="checkbox"/> User	<input type="checkbox"/> Admin	<input type="checkbox"/> Privilege Viewer	
1 Manage Accounts	<input type="checkbox"/> User	<input type="checkbox"/> Admin	<input type="checkbox"/> Privilege Viewer	
1 Change Password	<input type="checkbox"/> User	<input type="checkbox"/> Admin	<input type="checkbox"/> Privilege Viewer	
1 CAT Production Access Management	<input type="checkbox"/> User	<input type="checkbox"/> Admin	<input type="checkbox"/> Privilege Viewer	
1 CAT Test Access Management	<input type="checkbox"/> User	<input type="checkbox"/> Admin	<input type="checkbox"/> Privilege Viewer	

## All Other Users (including AAs)

When creating or modifying an account for an **Account Administrator** or **User**, the SAA or AA must indicate if the user is able to access CAT applications in the test (including the production mirror) and/or production environments, as shown in the screen shot below. The user will be able to access the applications in the selected environment(s) only.



## 4.2. CAT Reporter Portal User Types

The following user roles may be assigned to grant users privileges to access and use the Industry Member CAT Reporter Portal.

### 4.2.1. CAT Account Administrator

CAT AAs have the highest level of access in CAT. In the CAT Reporter Portal, CAT AAs can:

- Create, view, and transmit reportable events
- Upload data files
- View and repair errors
- Create, view, and edit Reporting Relationships
- Create, view, and edit ATS Order Types
- View and export feedback, including announcements, reporting summaries, and all error records
- View monthly report cards
- Create and edit firm preferences for linkage feedback file format
- Create and edit firm preferences for CAT Billing Trade Details file format
- View and export contacts
- Add contact, edit contact, and assign contact to role
- View invoices and associated documents by Document Type, Billing Period, Posted Date, Due Date, Invoice Amount, and Invoice Status
- Export invoices, revised invoices and late notices

- Export CAT Billing Trade Details

In the FINRA Entitlement system, CAT AAs can:

- Create, edit, disable, and delete CAT User and CAT Read-Only accounts
- Unlock and reset passwords for CAT Users and CAT Read-Only accounts
- CAT AAs cannot create, edit, disable, or delete their own accounts, or the accounts of other CAT AAs, nor can they unlock or reset other AA's passwords. Only the SAA can maintain CAT AA accounts.

#### **4.2.2.CAT User**

CAT Users can do the following in the Reporter Portal:

- Create, view, and transmit reportable events
- Upload data files
- View and repair errors
- Create, view, and edit Reporting Relationships
- Create, view, and edit ATS Order Types
- View and export feedback, including announcements, reporting summaries, and all error records
- View monthly report cards
- Create and edit user preferences
- View and export contacts

#### **4.2.3.Read-Only User**

Read-Only users can do the following in the CAT Reporter Portal:

- View Reporting Relationships
- View ATS Order Types
- View and export feedback, including announcements, reporting summaries, and all error records
- View monthly report cards

- View and export contacts

#### **4.2.4.CAT Portal IM View/Edit Contact User**

CAT Portal IM View/Edit Contact Users can do the following in the Reporter Portal:

- View and export contacts
- Add contact, edit contact, and assign contact to role

#### **4.2.5.CAT Portal IM View Invoice User**

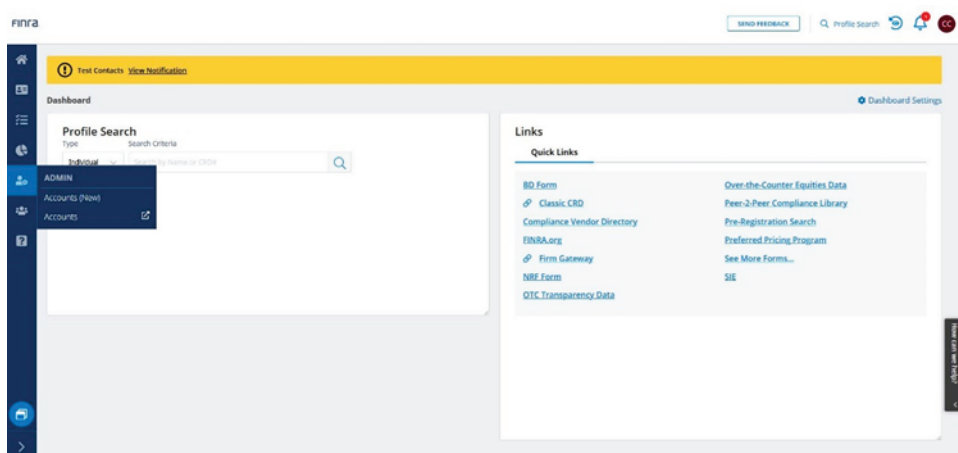
CAT Portal IM View Invoice Users can do the following in the Reporter Portal:

- View invoices and associated documents by Document Type, Billing Period, Posted Date, Due Date, Invoice Amount, and Invoice Status
- Export invoices, revised invoices and late notices
- Export CAT Billing Trade Details

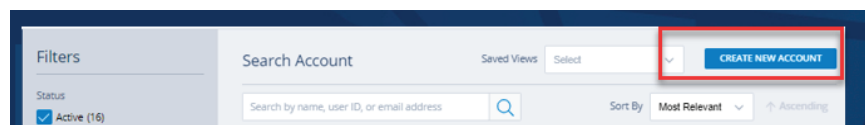
### 4.3. Create, Modify, and Delete CAT Accounts

SAAAs and CAT AAs may create, edit, and delete CAT User and CAT Read Only accounts per the following instructions:

- 1) Log into the [FINRA Gateway](#) and select the ADMIN icon from the side menu bar.
  - a) Select the “Accounts (New)” link to access the new Account Management functionality; and/or
  - b) Select the “Accounts” link to access the Legacy Account Management functionality (e.g., cloning, downloading).

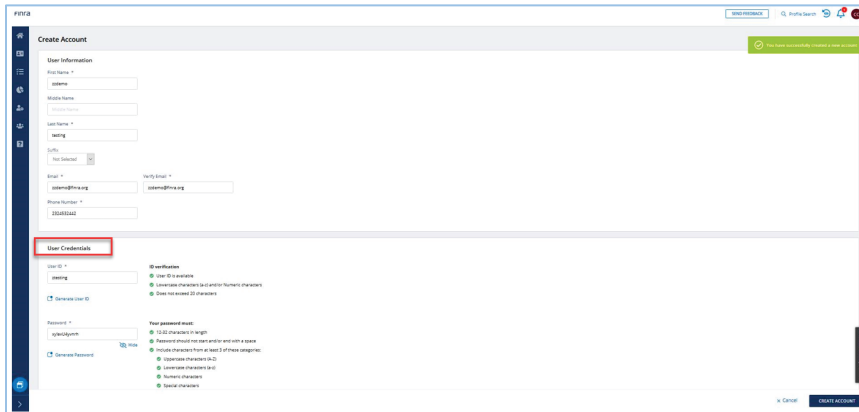


- 2) Select **Create New Account** to create a new user account. (Skip to step 8 below for instructions on modifying and deleting accounts.)



- 3) Complete the following sections of the new user’s account. All required fields are marked with an asterisk.
  - Provide the user’s name and contact information.
  - Click the link to generate a User ID automatically or create a User ID for the new user.

- Click the link to generate a temporary password or create one for the new user. The user will be prompted to change the password upon first logging into the system.



4) Copy the User Credentials and provide them to the user.

5) Click Create Account

### IMPORTANT NOTE REGARDING THE ONBOARDING PROCESS

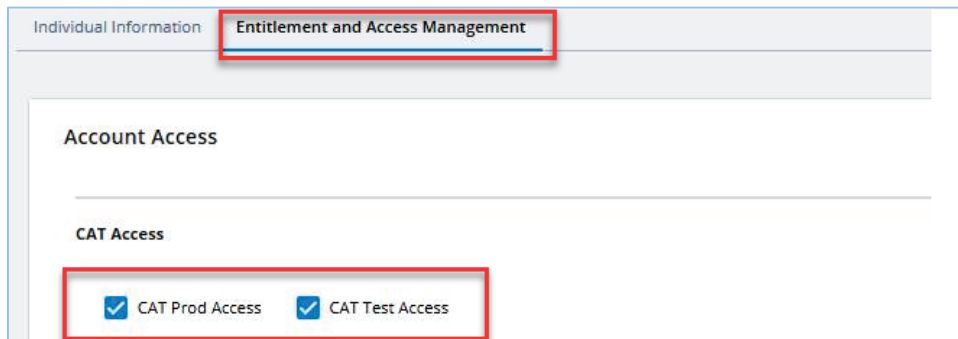
It is recommended that you provide the credentials to the user immediately. **The user must complete all steps of the onboarding process within 240 hours (10 days) of account creation.** Onboarding steps include (1) logging in to the account, (2) resetting the temporary password, (3) providing security challenge questions and answers, and (4) enrolling in multi-factor authentication<sup>6</sup>.

Failure to complete all onboarding steps within the required timeframe will result in the immediate expiration of the temporary password and automated revocation of CAT entitlements for the user account. When this occurs, the SAA or CAT Account Administrator must grant the necessary CAT entitlements again and set a new temporary password if the user requires CAT system access.<sup>7</sup>

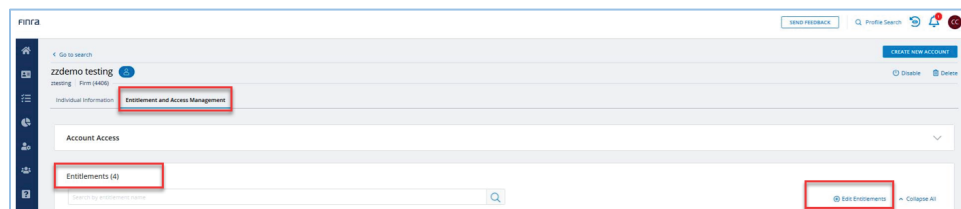
<sup>6</sup> See [Section 7: Manage Multi-Factor Authentication \(MFA\)](#) for information on enrolling.

<sup>7</sup> Additional resources for managing user accounts can be found at the end of this section.

- 6) From the Entitlement and Access Management tab, click on Account Access and select the environment(s) to which the user needs access. For additional information on environments, see [Section 4.1](#).



- 7) In the Entitlements section, click on Edit Entitlements and select the entitlement(s) for the CAT Reporter Portal based on the user's intended role in the system:



- CAT Reporter Portal – General application access.

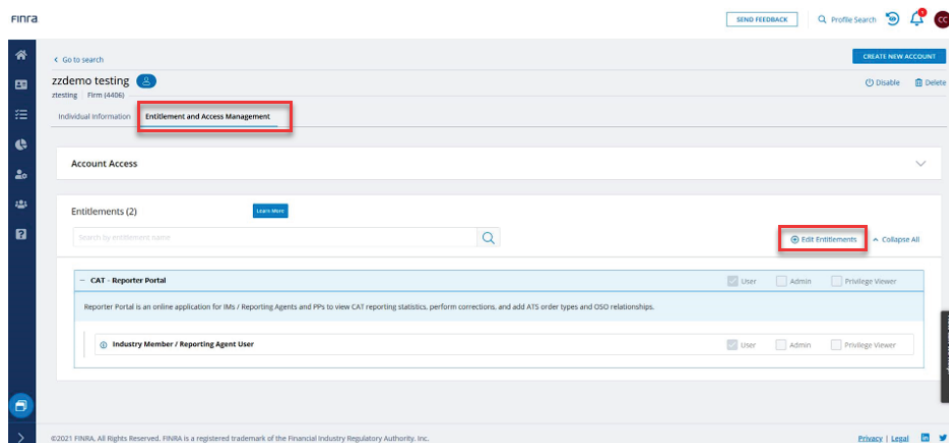
Note: At least one of the privileges below must also be granted for the user to access the application.

- CAT Admin – CAT Account Administrator access, as defined in [4.2.1](#).
- CAT User – CAT User access, as defined in [4.2.2](#).
- CAT Read Only – CAT Read-Only access, as defined in [4.2.4](#).
- CAT Portal IM View/Edit Contact User, as defined in [4.2.4](#)
- CAT Portal IM View Invoice User, as defined in [4.2.5](#)

- 8) Click Save

- 9) When modifying or deleting an account, select the User ID from the search results to open the user's account

- 10) Select the Entitlement and Access Management tab and click Edit Entitlements to modify a user's account or Delete to delete the user's account. **Deleted accounts cannot be reactivated.**



- 11) Modify the user's account and click Save or click Delete to remove the user.

*Note: SAAs and CAT AAs can also change a user's password or unlock an account in Password Lockout status in the Individual Information tab or from the Action box.*

Tips for managing user and administrator accounts are available in the following guides:

- [Quick Reference Information for Super Account Administrators](#)
- [FINRA Entitlement Reference Guide](#)

#### 4.4. Dormant Account Processing

Any account with CAT privileges which has not successfully logged on in the previous 12 consecutive months will be considered dormant (inactive) and all CAT privileges will be removed. If applicable, the organization's SAA or Account Administrator(s) will need to modify the user account to re-grant the necessary CAT user privileges.

Any account that remains dormant (inactive) for a period of 16 consecutive months will be deleted. If applicable, the organization's SAA or Account Administrator(s) will need to create a new user account.

See Section 4.3: Create, Modify, and Delete CAT Accounts for details on creating and modifying user accounts.

## 5. Request Secure File Transfer Accounts

### 5.1. SFTP Environments and Access Type

The SAA must designate which type of account access is being requested (Transaction Data and/or CAT Billing Trade Details) and, for CAT Transaction Data, must designate the environment for which access is being requested on the CAT Transaction SFTP Form.

#### 5.1.1. Transaction Data

Three environments are available for CAT Reporters to access as described in [Section 4.1: CAT System Environments](#). When requesting a new SFTP account, the SAA must designate the access level on the CAT SFTP Entitlement Form, that is, if the account is for test (including Production Mirror), production, or both. If no access level is marked on the CAT SFTP Entitlement Form, the SFTP account will be given access to both test and production environments. An SAA may submit another CAT SFTP Entitlement Form to update the access level if required.

SFTP accounts for the CAT Reporter may be given access to production only after testing certification has been completed. When the CAT Reporter completes testing certification and is granted access to the production environment, any SFTP account for which production access was designated will be granted production access.

The SAA (for a CAT Reporter) or the Account Administrator (for a CAT Reporting Agent) must submit a CAT SFTP form to request the access be changed for an SFTP account if access should be given to or removed from an existing SFTP account. **When removing SFTP environment access, ensure that the CAT Reporter has at least one remaining SFTP account for the environment.** For example, if the CAT Reporter has only one SFTP account with production access that access should not be removed since it would leave the CAT Reporter without the ability to submit data to the production environment.

#### 5.1.2. CAT Billing Trade Details

A separate SFTP entitlement allows Industry Members to access CAT Billing Trade Details from the Production environment using an SFTP account. CAT Secure File Transfer Account Types

A CAT Secure File Transfer Protocol (SFTP) account enables CAT Reporters Industry Members and CAT Reporting Agents to use a machine-to-machine connection to securely transmit data to CAT, or for Industry Members to receive CAT Billing Trade Details from CAT. There are two types of SFTP accounts:

- Account 1: CAT File Transfer – account is used to transmit data for Industry Members or CAT Reporting Agents to CAT and to receive related feedback; and

- Account 2: CAT Invoice Trade Details – account is used by only Industry Members to retrieve CAT invoice trade details.

## **5.2. CAT Secure File Transfer Accounts for CAT Transaction Data and CAT Billing Trade Details**

CAT Secure File Transfer Protocol (“SFTP”) Accounts enable Industry Members and CAT Reporting Agents to create a machine-to-machine connection to securely transmit data to CAT and receive related feedback.

An additional SFTP entitlement allows Industry Members to access CAT Billing Trade Details from the Production environment via a separate SFTP account. This separate account will only have access to the CAT Billing Trade Details.

To create, modify or delete an SFTP account, the organization must first have an SAA or CAT AA established and then submit a CAT SFTP Entitlement Form, available on the CAT NMS Web Site at <https://www.catnmsplan.com/transaction-registration>. Once the request is verified and processed, the FINRA Entitlement team will send the account credentials to the contact identified on the form. Prior to first use of the SFTP account to submit data, the initial password must be reset by logging into <https://accountmgmt.finra.org/myews/>. Once the password is reset, it will not expire.

CAT SFTP accounts can be used solely for the machine-to-machine transmission of data to/from CAT and cannot be used to access any other CAT system. Additionally, existing FINRA FTP accounts cannot be used to submit data to or receive data from CAT.

## 6. Manage Connectivity

Connectivity to CAT will be via private line or the CAT Reporter Portal. Private line connectivity will be provided via a managed private network. Private line solutions will provide access to both the SFTP (Secure File Transfer Protocol) service for machine-to-machine connectivity, as well as to the CAT Reporter Portal for interactive reporting through web-based forms or manual file upload.

The CAT Reporter Portal is also accessible via the web using a secure, authenticated internet connection. No client software installation is required. To successfully access the CAT Reporter Portal, users must:

- use TLS 1.2 requiring at a minimum NIST compliant 128-bit ciphers.
- use a HTML5-compatible browser such as Chrome, Edge, or Firefox.
- have established multi-factor authentication.<sup>8</sup>

Connectivity details are provided in the [FINRA CAT Connectivity Supplement for Industry Members](#).

**REMINDER:** For security purposes, CAT imposes minimum operating system requirements for accessing any CAT application. In order to access any CAT application, any device used to access the application and any device used for multi-factor authentication must be running an operating system that has not been deemed as “end-of-life” by the operating system vendor.<sup>9</sup>

---

<sup>8</sup> See [Section 7: Manage Multi-Factor Authentication \(MFA\)](#) for details.

<sup>9</sup> See [Operating System Requirements for Accessing CAT Applications](#) for details.

## 7. Manage Multi-Factor Authentication (MFA)

The Reporter Portal requires multi-factor authentication, or MFA, to provide an additional layer of security beyond the User ID and password required for login. Multi-factor authentication is required for users accessing the Reporter Portal via private line connection, AWS Private Link, or the Secure Reporting Gateway over the internet. The second-level authentication is provided by Duo, and end users must enroll a smart phone, tablet, or U2F security key (e.g., a Yubikey or Feitian key) in the Duo service to initiate the authentication process and to use this service going forward.

Attempts to access CAT in the Test, Production Mirror, or Production environment by a user physically located in any of the following countries is prohibited:

Afghanistan	Haiti	Russia ( <i>Russian Federation</i> )
Armenia	Hong Kong	Somalia
Azerbaijan	Iran ( <i>Islamic Republic of Iran</i> )	South Sudan
Belarus	Iraq	Sudan
Bolivia	Kazakhstan	Syria ( <i>Syrian Arab Republic</i> )
Burkina Faso	Kyrgyzstan	Taiwan
Burma ( <i>Myanmar</i> )	Laos	Tajikistan
Cambodia	Lebanon	Turkmenistan
Central African Republic	Libya ( <i>Libyan Arab Jamahiriya</i> )	Ukraine
China	Macau	Uzbekistan
Congo ( <i>Democratic Republic</i> )	Mali	Venezuela
Cuba	Moldova	Vietnam
Cyprus	Mongolia	Yemen
Eritrea	North Korea ( <i>Democratic</i>	Zimbabwe
Georgia	<i>People's Republic of Korea</i> )	

## **MFA Requirements**

If using a **smart phone or tablet**:

- The device must have a screen lock enabled.
- The device must be on an operating system that is not identified as “end-of-life”. While the system will encourage users to download the most current version of their operating system, it will not prevent entry by lower versions, if they are not identified as end-of-life versions. Consult your OS provider for more information about which operating systems are considered end-of-life.
- End-of-life operating systems are supported for a short grace period after their end-of-life date. If a user attempts to use a device with an end-of-life operating system during that time, they will be able to authenticate, but will be notified that they need to update their operating system. After the grace period, they will no longer be able to access CAT systems without updating their operating system.
- The user must access the CAT system from a different device than the device used for multifactor authentication.
- The device must have internet connectivity via a wireless or cellular connection in order to accept push notifications from Duo. The entry of a password from the Duo application will not be permitted.

If using a **security key**:

- The computer used to access CAT must have a USB port, and no USB block enabled that would restrict use of that USB port.
- The user must access CAT via a supported browser (Chrome 70 or later, Firefox 60 or later, or Opera 40, or later) for authentication.
- The user must have a supported security key. Duo MFA supports WebAuthn/FIDO2 security keys such as those offered by Yubico and Feitian. U2F-Only security keys such as Yubikey NEO-n are not supported with Firefox.

*FINRA CAT does not endorse any specific security key vendor or model and recommends that organizations perform adequate testing to ensure that the device they intend to use is compatible with Duo MFA for FINRA CAT. More information on Duo-compatible security keys is available on Duo's [website](#).*

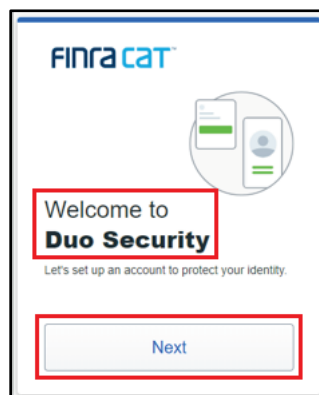
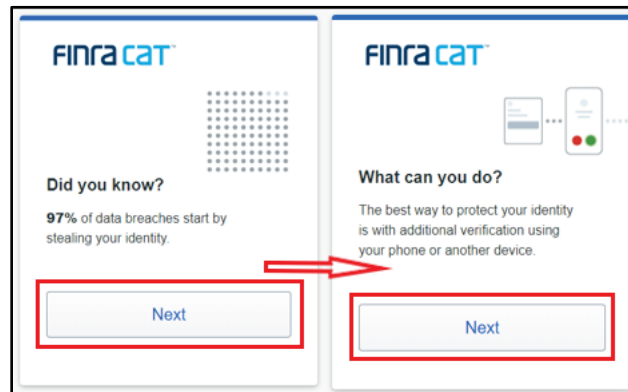
## 7.1. Enroll in Duo MFA service

All users must enroll in the Duo MFA service to be able to access the Reporter Portal. The following enrollment steps only need to be completed once per CAT user account. New users will be prompted to complete these steps before they can access the Reporter Portal.

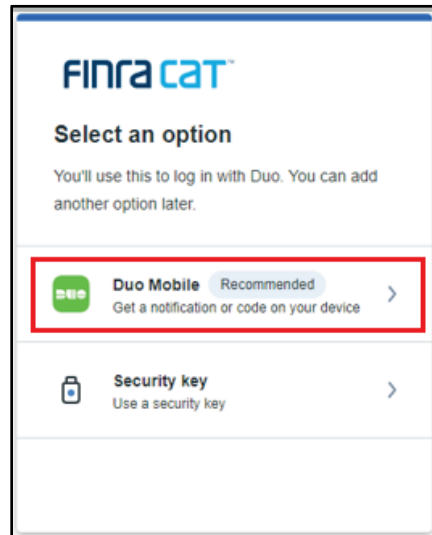
1. Navigate to the Reporter Portal based on your connectivity method. See the Industry Member [CAT Reporter Portal User Guide](#) for access information. Log-in with User ID and password.

2. Click **Continue to MFA** on the Multi-Factor Authentication Screen to start setup to begin the enrollment process.

3. Review and follow the instructions on the screen, click **Next** to move to the next screen.



4. On the Select an option screen user is able to select either Duo Mobile or Security Key. Duo Mobile is generally recommended. If you have previously established MFA, a Mange devices options will be available to you. Select the type of device you will use for authentication (mobile phone, tablet, or security key) and click **Continue**.

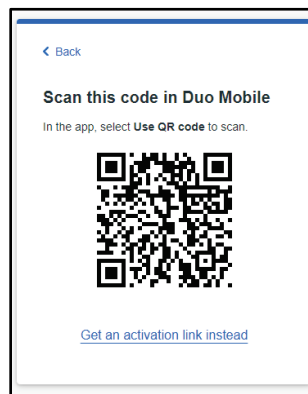


To enroll a phone or tablet, continue to Step 5. To enroll a security key, skip to Step 6.

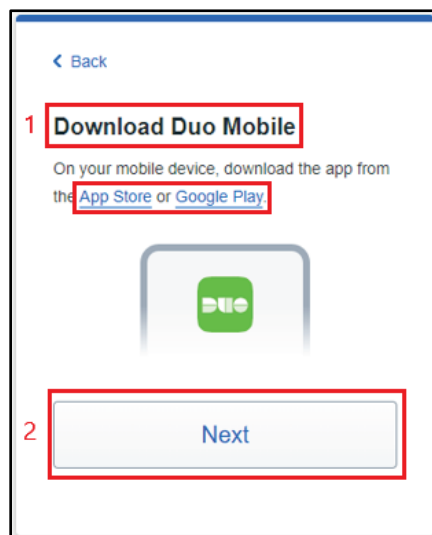
5. Complete the following steps to enroll a **phone or tablet** in Duo MFA:
  - a. If enrolling a phone, enter the phone number of the device and check the box to confirm the phone number. **The user must have access to the device associated with this phone number to log into the Reporter Portal.** If enrolling a tablet, no phone number is required. Select the type of device being used for authentication (mobile phone or tablet).
  - b. Enter your phone number. If the phone number entered is in use for authentication by another user account, the system will return an error stating that the number cannot be added. Please contact the CAT Helpdesk (help@finracat.com) to request that the number be enabled for use with a second account.

The screenshot shows the 'Enter your phone number' screen. At the top is a '< Back' link. Below it is the title 'Enter your phone number' and a subtext: 'You'll have the option to log in with Duo Mobile.' There are two input fields: 'Country code' (with a dropdown menu showing '+1') and 'Phone number' (with a text input field). Below these fields is an example: 'Example: "201-555-5555"'. At the bottom is a 'Continue' button and a link 'I have a tablet'. A red box highlights the 'Country code' and 'Phone number' input fields, and another red box highlights the 'Continue' button. A red '1' is next to the input fields and a red '2' is next to the 'Continue' button.

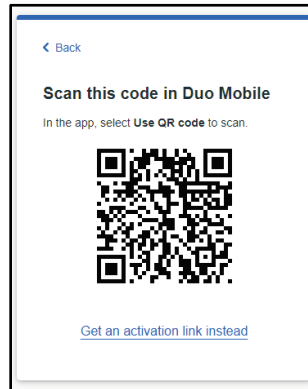
- c. Once a valid phone number has been entered, click **Continue**.
  - i. In order to complete enrollment, the user will receive a text message with the security code that needs to be entered in the original Duo enrollment webpage (first time requirement).
  - ii. If the user selects “I have a tablet” a QR code will display.



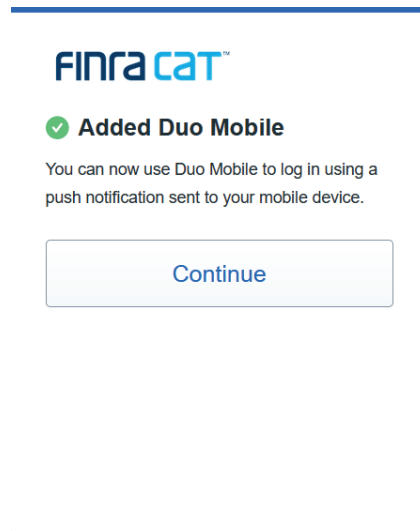
- d. If the Duo Mobile application is not already installed on the device, follow the instructions to complete installation. The application can be installed from either App Store or Google Play. Upon completion of the installation, the user needs to click **Next** to proceed.



- e. If the Duo application is already installed and you need to have an additional account. In the mobile device, open Duo application, click on Add (+) button. Select the type of device being added. Once Add is clicked, the user will see an option to scan QR Code.
- f. A QR code will appear on your computer screen.

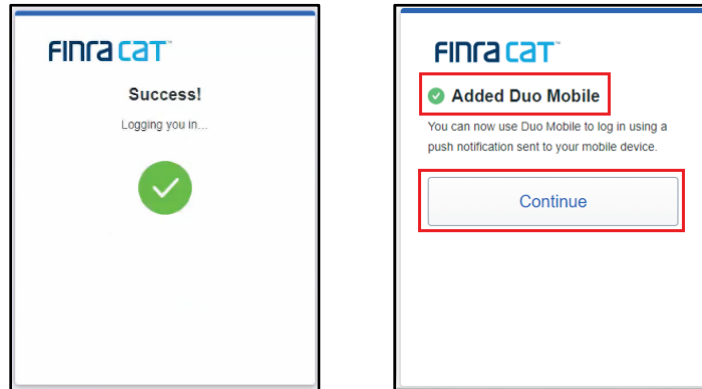


- g. Using the Duo mobile application, click + to scan the code<sup>10</sup> and link the Duo Mobile application to your CAT user account. **You must authorize Duo Mobile to access your device camera in order to scan the code.** By clicking on the QR Code, the device camera will open up and will be ready to scan the QR. Scan the QR Code with your device. Afterwards, the user will see confirmation that the device was added.



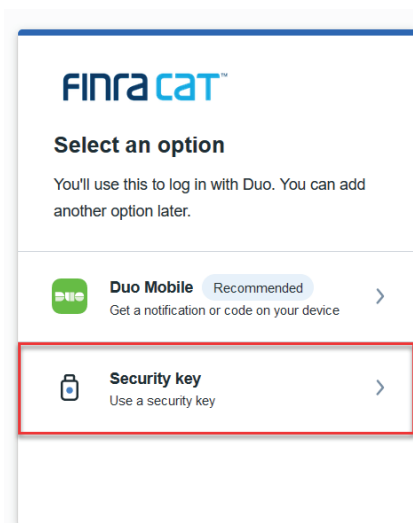
<sup>10</sup> If unable to scan the code, click the option “Get an activation link instead” to have an activation link sent to you via email.

- h. Click **Continue** to complete enrollment. To complete the set-up process, the user should follow steps indicated on their mobile device.
- i. To finalize the enrolment, the user should return to Duo page and click continue. A success message will appear upon successful sign-in.

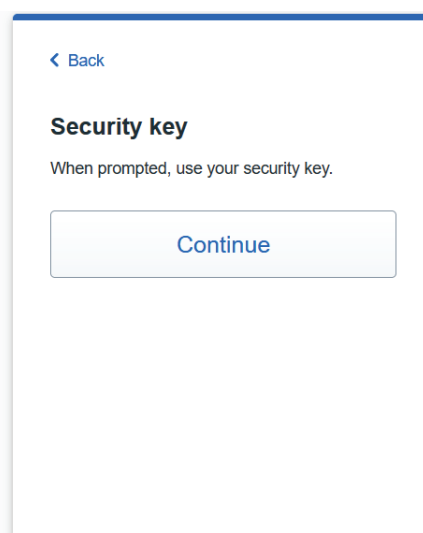


- j. Once enrolled, review the user settings. See [Section 7.5: Manage Device Settings](#) for details. The user may select a default authentication method or may select how to authenticate at each log in. **It is recommended that all users utilize Duo Push to automatically get push to mobile device.**<sup>11</sup>
6. Complete the following steps to enroll a **security key** in Duo MFA:
    - a. Select **Security Key** to begin enrolling your security key.

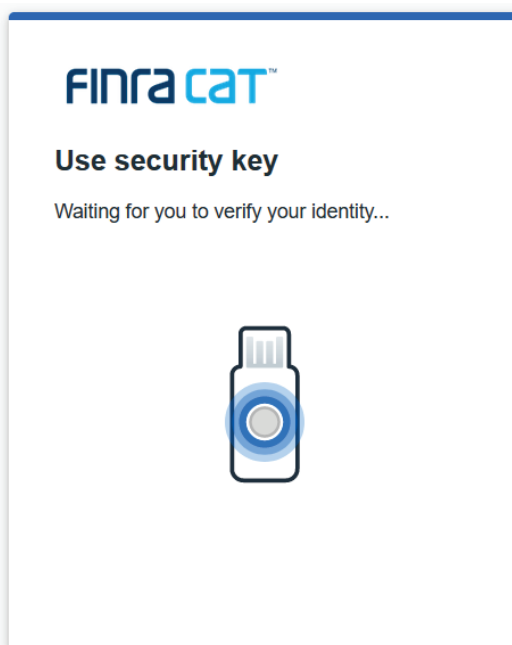
<sup>11</sup> CAT requires all Duo authentication via a phone or tablet to be performed using the push method. Setting Duo to automatically push a notification to a designated device by default does not preclude the user from requesting an additional push, selecting an alternate device, or providing a bypass code during login if needed.



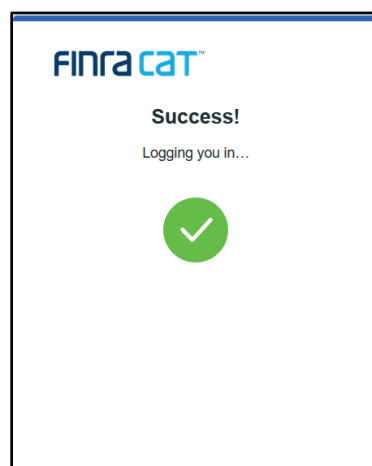
- b. Click **Continue**.



- c. Insert your security key into the USB port on your computer and, if needed for the model used, tap the key or press the button.



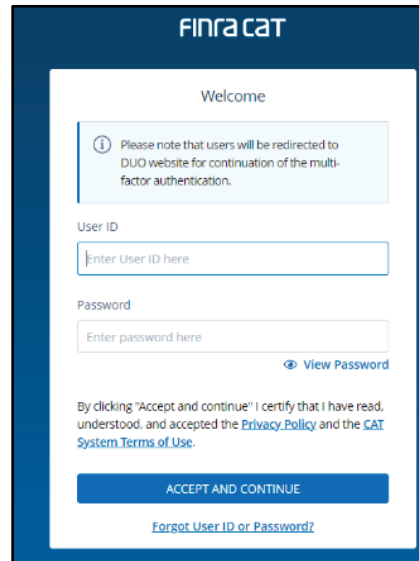
- d. A message will appear confirming that your enrollment was successful.



## 7.2. Log In Using Duo MFA Service

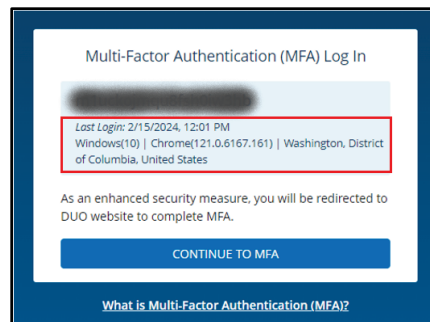
The User ID, Password, and Duo MFA authentication must be provided each time the user accesses the Reporter Portal.

1. Navigate to the Reporter Portal based on your connectivity method. See the Industry Member [CAT Reporter Portal User Guide](#) for access information.
2. Enter the User ID and Password.



The image shows the FINRA CAT Welcome screen. At the top, it says "Welcome". Below that is a blue box with an information icon and text: "Please note that users will be redirected to DUO website for continuation of the multi-factor authentication." Underneath is a "User ID" field with a placeholder "Enter User ID here". Below that is a "Password" field with a placeholder "Enter password here" and a "View Password" link. At the bottom, there is a blue button labeled "ACCEPT AND CONTINUE" and a link "Forgot User ID or Password?".

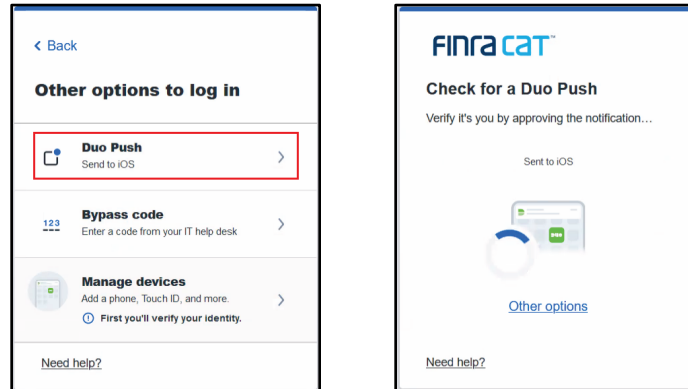
Information is displayed for the most recent login to a CAT application for the account. **If these details do not reflect the last known login for the account, FINRA CAT recommends that you immediately change your account password and contact the FINRA CAT Helpdesk at 888-696-3348.**



The image shows the Multi-Factor Authentication (MFA) Log In screen. At the top, it says "Multi-Factor Authentication (MFA) Log In". Below that is a blurred area. Underneath is a red box containing the text: "Last Login: 2/15/2024, 12:01 PM Windows(10) | Chrome(121.0.6167.161) | Washington, District of Columbia, United States". Below the red box is a message: "As an enhanced security measure, you will be redirected to DUO website to complete MFA." At the bottom is a blue button labeled "CONTINUE TO MFA" and a link "What is Multi-Factor Authentication (MFA)?".

3. Click on **Continue to MFA**.
4. To authenticate using a **security key**, insert the security key and, if required, tap the key or push the button.
5. To authenticate using a **phone or tablet**, click on **Duo Push** to receive verification in the Duo App.
  - If the account is not set to automatically send a push notification, click **Duo Push**.
  - Access the Duo Mobile application on the associated device.

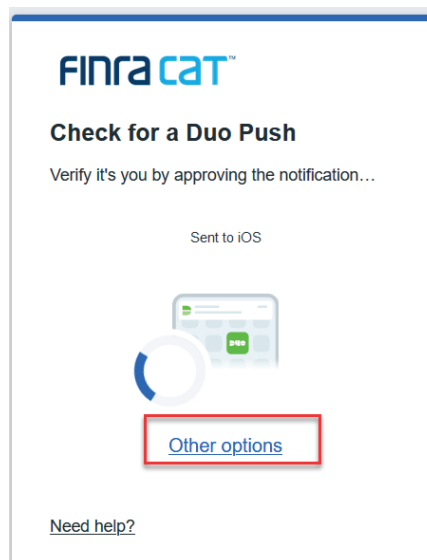
- Approve the request.



## To authenticate using a bypass code provided by the CAT Helpdesk:

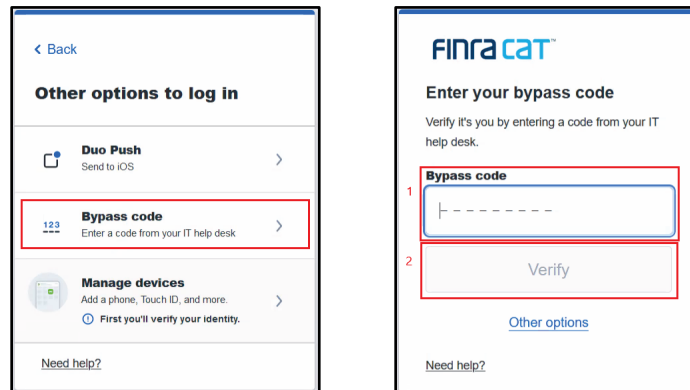
If the authentication device cannot be accessed, the user may contact the FINRA CAT Helpdesk for assistance. Once the Helpdesk confirms the user's identity, they can provide a bypass code that can be used for one-time authentication. **Users without an authentication device enrolled cannot be provided with a bypass code.**

- Enter the User ID and Password. If you have already enrolled enabled Duo Push, click **Other Options**.



- Click **Bypass Code**.

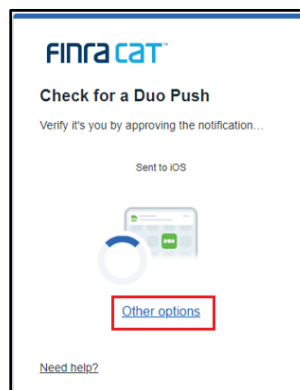
- Enter the code provided by the CAT Helpdesk and click **Log In**.



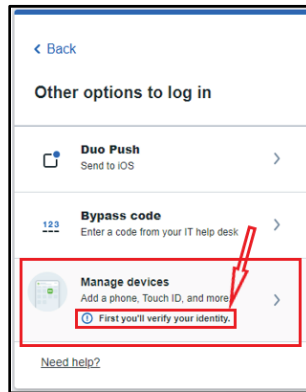
### 7.3. Enroll an Additional Device in Duo MFA Service

Users may find it necessary to add an alternate device to their account. **To enroll an additional device, the user must have access to a currently enrolled device. If the currently enrolled device is no longer available, contact the FINRA CAT Helpdesk at 888-696-3348 or at [help@finracat.com](mailto:help@finracat.com) for assistance.**

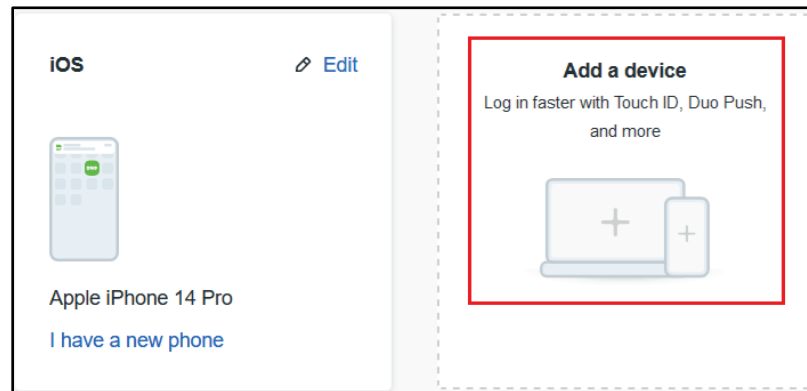
1. Navigate to the Reporter Portal based on your connectivity method. See the Industry Member [CAT Reporter Portal User Guide](#) for access information. Log-in with User ID and password.
2. Complete authentication using a currently enrolled device or using the bypass code provided by the FINRA CAT Helpdesk if an existing device is not available. (See [Section 7.2: Log In Using Duo MFA Service](#)). **Do not** accept Duo Push on your mobile device yet.
3. Click **Other Options** on the Duo web browser.



4. Click on **Manage devices** and authenticate yourself using existing device.



5. Once authenticated, a new window will appear. Click **Add a Device**.



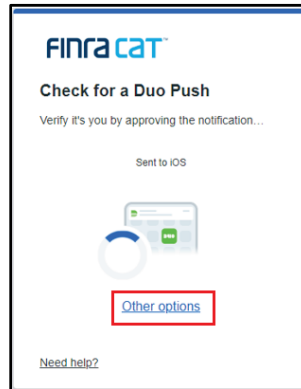
6. Enroll the additional device using the instructions provided in [Section 7.1: Enroll in Duo MFA service](#), beginning with Step 5.
7. If needed, to change the default device, change the default login method, or remove a device, refer to [Section 7.5: Manage Device Settings](#).

#### 7.4. Replace a Device

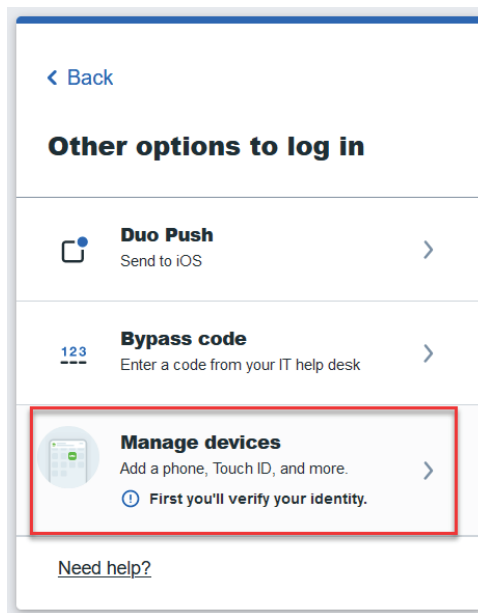
Users may find it necessary to replace a device on their account, for example when a cell phone has been replaced or upgraded. **To replace a device, the user must have access to another currently enrolled device. If another currently enrolled device is not available, contact the FINRA CAT Helpdesk at 888-696-3348 or at [help@finracat.com](mailto:help@finracat.com) for assistance.**

1. Navigate to the Reporter Portal based on your connectivity method. See the Industry Member [CAT Reporter Portal User Guide](#) for access information. Log-in with User ID and password.

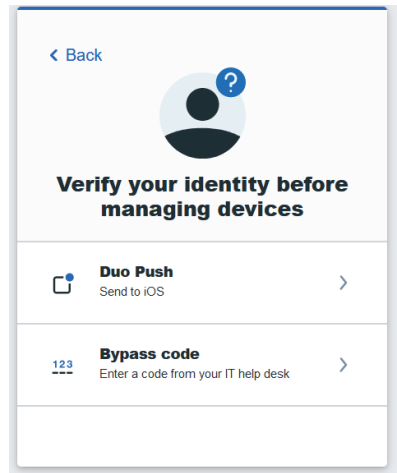
2. Complete authentication using a currently enrolled device or using a bypass code provided by the FINRA CAT Helpdesk if an existing device is not available. **Do not** accept Duo Push on your mobile device yet.
3. Click **Other Options** on the Duo webpage.



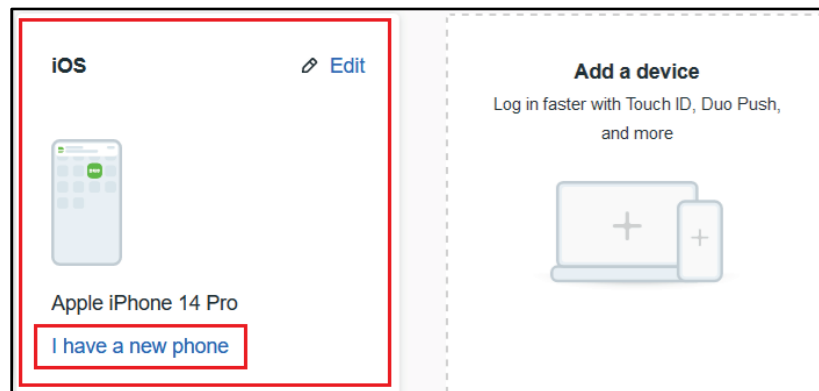
4. Click **Manage Devices**.



5. Complete authentication using a currently enrolled device or using the bypass code provided by the FINRA CAT Helpdesk if an existing device is not available. (See Section 7.2: Log In Using Duo MFA Service).



- Once authenticated, a new window will appear. Click **I have a new phone..**

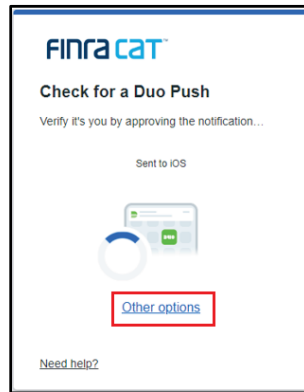


- Enroll the replacement device using the instructions provided in [Section 7.1: Enroll in Duo MFA service](#), beginning with Step 4c.

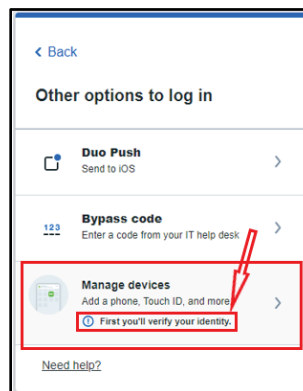
## 7.5. Manage Device Settings

Users can change their preferences including selecting the default device, removing enrolled devices and updating a device name by following the steps below.

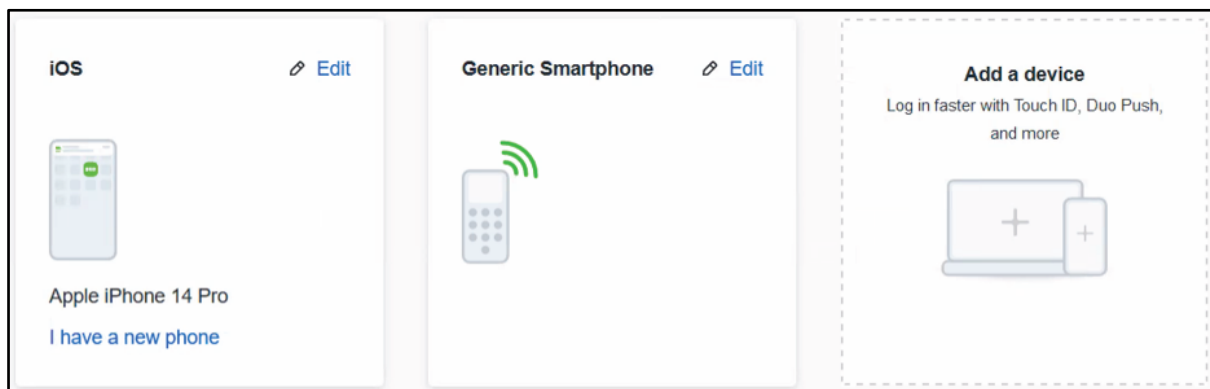
- Navigate to the Reporter Portal based on your connectivity method. See the Industry Member [CAT Reporter Portal User Guide](#) for access information. Log-in with User ID and password.
- Click **Other Options** in the Duo webpage.



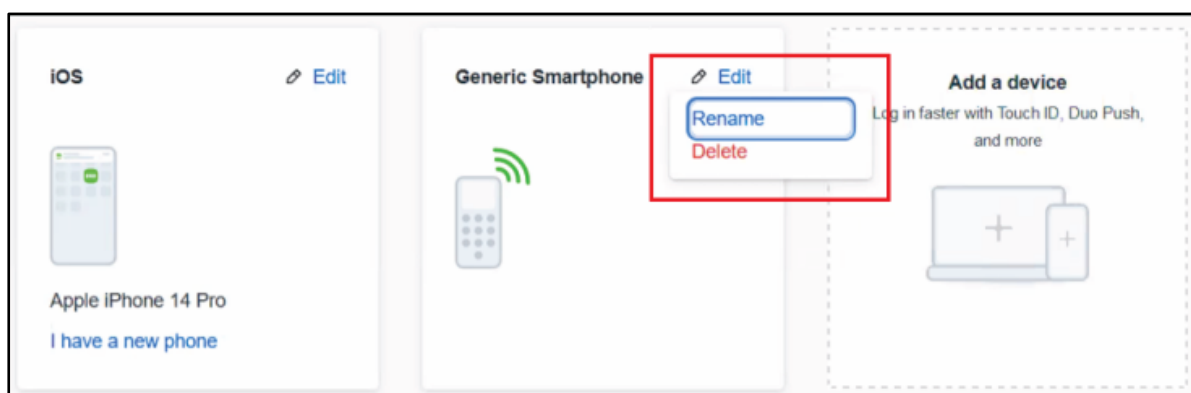
3. Click on **Manage devices** and authenticate yourself using a currently enrolled device. (See [Section 7.2: Log In Using Duo MFA Service](#))
4. To **manage a specific device**, including setting a customized device name or deleting an enrolled device:
  - a. Navigate to the Reporter Portal based on your connectivity method. See the Industry Member [CAT Reporter Portal User Guide](#) for access information. Log-in with User ID and password.
  - b. Click **Other Options** in the Duo webpage.
  - c. Click on **Manage devices** and authenticate yourself using a currently enrolled device. (See [Section 7.2: Log In Using Duo MFA Service](#))



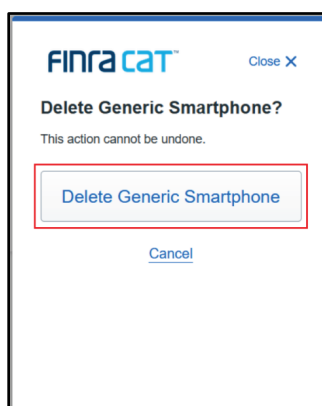
- d. Upon completion of authentication, all registered devices will display.



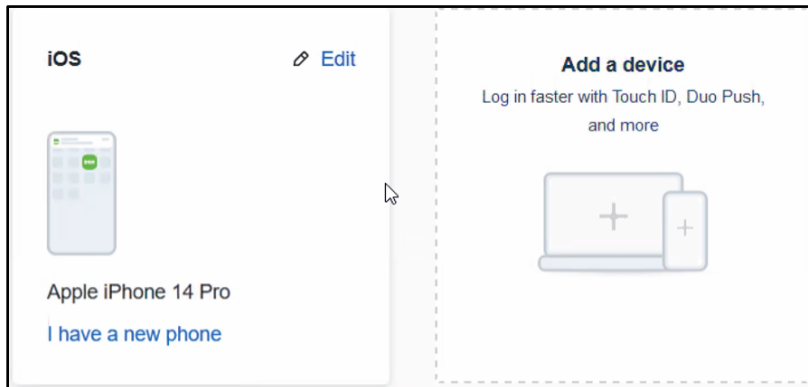
1. To either edit the device name or to delete the device, click on the **Edit** button and then select either **Rename** or **Delete**, as applicable.



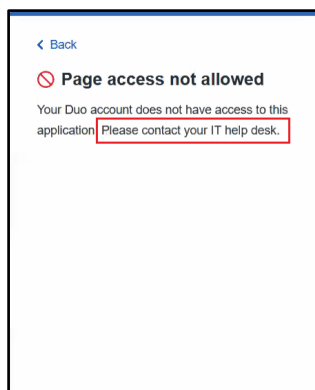
2. To finish deleting the device, click on the device name in the next screen.



3. If deletion was successful, the previous screen will re-appear, but will contain one less device.



4. If there was an issue with deletion, and error message will pop-up.



**Reach out to FINRA CAT Helpdesk at 888-696-3348 for further assistance with Duo.**

## 8. Establish CAT Reporting Relationships in the Test Environment

CAT Reporting Relationships are required to authorize a Reporting Agent to report on behalf of a CAT Reporter and to authorize a Third-Party Reporting Agent to view data submitted on behalf of a CAT Reporter by another Submitter. Firms that will not use a Reporting Agent or Third-Party Reporting Agent are not required to add Reporting Relationships.

During onboarding, CAT Reporting Relationships must be entered using the CAT Reporter Portal in the Test Environment. There are two types of Reporting Relationships:

**Reporting Agent (Submitter)** – Authorizes an organization to transmit data to CAT on behalf of a CAT Reporter IMID.

- For SFTP submissions, Reporting Agents will receive a copy of the error feedback in their SFTP feedback folder for data submitted on behalf of the CAT Reporter.
- Using the CAT Reporter Portal, Reporting Agents can view and take action on Reporting Feedback and Errors for the submissions made by the Reporting Agent on behalf of the CAT Reporter.
- Relationship record requires the IMID of the CAT Reporter and CRD# / Org ID of the Reporting Agent (Submitter ID).

**Third-Party Reporting Agent** – Authorizes an organization to view data submitted on behalf of a CAT Reporting IMID by another Submitter.

- In addition to the Reporting Relationship, Third-Party authorization requires the inclusion of the Third-Party Reporting Agent's identifier in the Metadata File submission by the Submitter.
- For the data files transmitted by the Submitter for which the Third-Party Reporting Agent is designated, all associated Reporting Feedback and Errors can be viewed by the Third-Party Reporting Agent using the CAT Reporter Portal.
- Third-Party Agents must have a Reporting Agent relationship to submit repairs to CAT.
- Relationship record requires the IMID of the CAT Reporter, CRD# / Org ID of the Reporting Agent (Submitter ID), and CRD# / Org ID of the Third-Party Reporting Agent.

**For additional information on establishing and maintaining CAT Reporting Relationships, see the Industry Member [CAT Reporter Portal User Guide](#).**

## 9. Establish ATS Order Types in the Test Environment

Industry Member ATSs are required to register ATS Order Types with CAT at least 20 days prior to the Order Type becoming effective. During onboarding, ATS Order Types must be entered using the CAT Reporter Portal in the Test Environment.

The following information must be provided for each Order Type used by an ATS:

- ATS MPID
- Order Type Identifier assigned by the ATS
- Description of how the Order Type operates within the ATS
- Effective date of the Order Type
- Expiration Date of the Order Type

Industry Members may not reuse Order Type Identifiers for the same ATS MPID. See [CAT Alert 2019-01](#) for more information.

**For additional information on establishing and maintaining ATS Order Types, see the Industry Member [CAT Reporter Portal User Guide](#).**

## 10. Conduct Testing for Production Readiness

Industry Members and CAT Reporting Agents are required to perform testing to demonstrate their ability to successfully submit data to CAT. Production readiness testing is limited to the validations in effect when an Industry Member is required to begin reporting data to CAT.

CAT Reporters have no volume limitation and may submit full production-equivalent loads to the Test Environment(s). Validations and feedback processes mirror those of the Production Environment. Test symbols will be accepted in the Test Environment, which is available 24x6.

### 10.1. CAT Production Readiness Testing Requirements for Self-Reporting Firms

Firms that will report to CAT on their own behalf must perform the following:

- **Step 1:** Successfully connect to SFTP and/or login to the CAT Reporter Portal Test Environment.
- **Step 2:** Successfully submit at least one data file to the Test Environment for each of its CAT Reporter IMIDs without error.
- **Step 3:** Successfully submit a single day of production data to the Test Environment with an error rate of less than 10%.
- **Step 4:** Record the CAT Processing Date on which the single day of production data was submitted to the Test Environment.

### 10.2. Production Readiness Testing Requirements for CAT Reporting Agents (“CRA”)

CAT Reporters and CAT Reporting Agents (“CRA”) that will report to CAT on behalf of a firm must perform the following:

- **Step 1:** Successfully connect to SFTP and/or login to the CAT Reporter Portal Test Environment.
- **Step 2:** Ensure the CRA is identified in a CAT Reporting Relationship in the Test Environment by CAT Reporter(s) for which the CRA will transmit data to CAT. The CRA must provide a complete list of IMIDs for which it plans to report. FINRA CAT will validate that the relationships for each IMID have been created in the CAT Reporter Portal.
- **Step 3:** Successfully submit data files to the Test Environment that contain all the event types that the CRA will support.

- **Step 4:** Successfully complete a capacity test by submitting a single day of full production volume to the Test Environment. The capacity test should include data for each of the CAT Reporter IMIDs for which the CRA is reporting. If a CRA plans to submit data for an IMID that is not yet prepared to submit data to CAT, the CRA should estimate the number of events to be processed and expected utilization of the IMID for the purpose of the capacity test.
- If a CRA is also an Industry Member that plans to self-report its own data along with data submitted on behalf of other firms, the CRA must certify its own IMIDs under the requirements outlined in Section 11.1. If the data submitted on behalf of other firms will exceed 50% of the anticipated daily volume submitted by the CRA across all entities, the CRA must conduct a load test as described above.
- **Step 5:** Record the CAT Processing Date on which the single day of production data was submitted to the Test Environment.

### **10.3. Production Readiness Testing Requirements for Industry Members Submitting via CAT Reporting Agents**

CAT Reporters that will exclusively report to CAT using a Reporting Agent must perform the following:

- **Step 1:** Firm and CRA successfully connect to SFTP and/or login to the CAT Reporter Portal Test Environment.
- **Step 2:** CAT Reporter has defined one or more CAT Reporting Agent Relationships in the Test Environment.
- **Step 3:** Record the CAT Processing Date(s) on which each CRA has successfully submitted a single day of production to the Test Environment on the Industry Member's behalf.

### **10.4. Production Readiness Testing Requirements for Industry Members that Do Not Have Production Data Prior to the Certification Deadline and for Industry Members That Start Trading After the Go-live Date**

CAT Reporters that will not have production data volume prior to the certification deadline and/or go-live date must perform the following:

**Step 1:** Firm and CRA (if applicable) successfully connect to SFTP and/or login to the CAT Reporter Portal Test Environment.

**Step 2:** CAT Reporter has defined one or more CAT Reporting Agent Relationships in the Test Environment (if applicable).

**Step 3:** Record the CAT Processing Date(s) on which the firm and each CRA (if applicable) has successfully submitted test order and/or trade events to the Test Environment to demonstrate that relationships and entitlements are effective.

## 11. Certification of Testing Completion

Once CAT Reporters have completed all onboarding steps, including the successful completion of production readiness testing, each IM and CRA must contact the FINRA CAT Helpdesk at 888-696-3348 or [help@finracat.com](mailto:help@finracat.com). The FINRA CAT Helpdesk will require the Processing Date(s) on which the testing occurred.

Upon verification of the Onboarding Steps by FINRA CAT, CAT Reporters will be granted access to the CAT Production Environment and a notification confirming access will be sent.

## 12. CAT Contact Management System

The CAT Contact Management System is a functionality within the CAT Reporter Portal that allows Industry Members and CAT Reporting Agents, including Service Bureaus, to add, edit, assign to role, view, and export contacts related to Billing (primary and Alternate), Compliance, Security, Networking, Operations, and Primary points of contact for CAIS and Transaction reporting.

While Industry Members are encouraged to provide contacts for each role; **at a minimum, Industry Members should provide a Billing Contact by December 10, 2023.**<sup>12</sup> In the event that an Industry Member does not provide a Billing Contact, then the Billing Contact will be populated with the Primary Contact listed on its most recent CAT Registration Form. The Primary Contact listed on the most recent CAT Registration Form will likewise be used as the initial Billing Contact for any Industry Members onboarding after December 2023. The Industry Member may update this Billing Contact at any time via the CAT Reporter Portal.

Individuals listed on the CAT Registration Form or CAIS Registration Form may also be listed in the Contact Management system; however, completion of the registration forms and the Contact Management contacts is required. See Section 13 of the [CAT Reporter Portal User Guide](#) for more information related to the CAT Contact Management System functionality.

---

<sup>12</sup> Contacts must be submitted to the Production Environment. The requirement to provide a Billing Contact is not applicable to Service Bureaus.

### 13. CAT Billing

CAT Reporters who are CAT Executing Brokers that have billable CAT trading activity will receive CAT invoices. CAT Reporters who are CAT Executing Brokers that have CAT billable trading activity will receive CAT invoices. See FAQ [V3](#) for the definition of “CAT Executing Broker” and FAQs [V4](#) and [V5](#) for a discussion of CAT billable activity. The Invoice Viewer functionality within the CAT Reporter Portal contains various documents and files associated with CAT Billing, including Invoices and Late Notices, as well as the CAT Billing Trade Details files.

While still subject to Consolidated Audit Trail, LLC (CATLLC) approval and applicable fee filings being submitted by the Participants to implement fees on behalf of CATLLC (subject to applicable SEC fee filing requirements), it is currently anticipated that the initial Historical CAT Assessment, referred to as Historical CAT Assessment 1, will be assessed starting with trades occurring no earlier than November 1, 2023. Assuming a November 1, 2023 effective date, the first invoices would be issued on December 26, 2023, based on transactions in Eligible Securities in November 2023.

Invoices will be issued no later than the first business day following the 24th of the following month. Payment can be made via mailing or overnight check, ACH, or bank wire. Payment instructions can be found on the invoice. No other forms of payment will be accepted. Monthly trade details related to CAT fees are delivered via SFTP and the CAT Reporter Portal. See Section 14 of the [CAT Reporter Portal User Guide](#) for more information related to the CAT Invoice Viewer, including an overview of the Invoice. Also see [CAT Alert 2023-02](#) (CAT Billing) or [Section V](#) of FAQs for additional information.