
Phase 1A Technical Specifications Updates

Original presentation: March 17, 2026

Updated: March 27, 2026

Agenda

- ▶ CAIS Amendment Overview
- ▶ Reference Database Implementation Plan (Updated March 27, 2026)
- ▶ Phase 1A File Submission and Feedback Updates
- ▶ Other Phase 1A Updates
- ▶ Phase 1B File Submission Updates
- ▶ Other Phase 1B Updates

CAIS Amendment Overview

- ▶ On January 13, 2026, the SEC approved an amendment (“the Amendment”) to the CAT NMS Plan relating to the Customer and Account Information System (“CAIS”).
- ▶ Effective with the Amendment, CAIS will be referred to as the Reference Database.
- ▶ The Amendment also eliminates requirements that Industry Members report Customer names, Customer addresses, account names, account addresses, years of birth, authorized trader names and Employer Identification Numbers (“EINs”); and eliminates the requirements relating to the handling of inconsistencies.
- ▶ These reporting changes will be implemented in two phases.
 - **Phase 1A** allows the continued acceptance of submissions that includes names, addresses, years of birth, EINs and the *updateNotification* field, but such information will not be processed.
 - **In Phase 1B**, any submissions that continue to include names, addresses, years of birth, EINs and the *updateNotification* field will be rejected.

Reference Database Implementation Timeline

	Spec Publication	Test Environment	Production Mirror/ Production Environment
Phase 1A	March 27, 2026	June 29, 2026	July 27, 2026
Phase 1B	June 2026	September 28, 2026	December 7, 2026*

*The originally proposed Production Mirror/Production Environment release date was December 14, 2026. Pursuant to industry feedback, the Production Mirror/Production Environment release date was updated to December 7, 2026.

Phase 1A and 1B: Industry Member Coding Overview

- ▶ **Phase 1A:** Reporting of names, addresses, years of birth, EINs and *updateNotification* is optional.
 - If submitted, this information will not be processed.
 - Industry Members and CAT Reporting Agents may optionally make coding changes for Phase 1A.
- ▶ **Phase 1B:** Submission of names, addresses, years of birth, EINs and *updateNotification* fields will be rejected.
 - All Industry Members and CAT Reporting Agents will be required to make coding changes for Phase 1B.

Phase 1A: Submission Changes (slide 1 of 3)

- ▶ Effective with Phase 1A, these fields are now Optional:

JSON Object Level	Field Name
FDID Record	<i>accountName</i> <i>addressList</i> <i>addrType</i> <i>addrLine1</i> <i>city</i> <i>regionCode</i> <i>countryCode</i> <i>postalCode</i> <i>authTraderNamesList</i> <i>authTraderNameID</i> <i>authTraderName</i>

Phase 1A: Submission Changes (slide 2 of 3)

- ▶ Effective with Phase 1A, these fields are now Optional:

JSON Object Level	Field Name
Natural Person Customer Record	<i>firstName</i> <i>lastName</i> <i>doingBusinessAs</i> <i>yearOfBirth</i> <i>addressList</i> <i>addrType</i> <i>addrLine1</i> <i>city</i> <i>regionCode</i> <i>countryCode</i> <i>postalCode</i> <i>updateNotification</i>

Phase 1 A: Submission Changes (slide 3 of 3)

- ▶ Effective with Phase 1A, these fields are now Optional:

JSON Object Level	Field Name
Legal Entity Customer Record	<i>legalName</i> <i>addressList</i> <i>addrType</i> <i>addrLine1</i> <i>city</i> <i>regionCode</i> <i>countryCode</i> <i>postalCode</i> <i>ein</i> <i>updateNotification</i>

Other Submission Changes– Material Inconsistencies

- ▶ In Phase 1A, *updateNotification* will be accepted but will not be processed.
- ▶ Also, in Phase 1A, Material Inconsistencies feedback will be generated and posted.
- ▶ Because *updateNotification* will not be processed, Industry Members will be unable to resolve Material Inconsistencies identified in feedback.
- ▶ Material Inconsistencies feedback will be disabled in Phase 1B.

Material Inconsistencies– Spec Updates

▶ **Phase 1A:**

- Per Draft CAT Alert 2026-01, Industry Members and CAT Reporting Agents are not required to resolve Material Inconsistencies.
- Removed sections referencing Plan requirements to identify inconsistencies, deadlines for resolution and resolution procedures:
 - Previous Section 2.4, Section 5.4.3 and Section 6.6.3.
- Sections describing the Material Inconsistencies identification process, the Outstanding Material Inconsistencies Feedback File and the Inconsistency Codes remain.
 - Language was added to Section 6.4 and Appendix B.5 detailing how Material Inconsistencies will be handled in Phases 1A and 1B.
 - Feedback examples were updated.

▶ **Phase 1B:**

- Remaining references to inconsistencies will be removed.

Phase 1A: Other Feedback Changes– Outstanding Rejections

- ▶ In Phase 1A, fields related to names, addresses, year of birth and EIN will be accepted but will not be processed.
- ▶ Effective with Phase 1A, there will be no new rejections related to names, addresses, year of birth or EIN.
- ▶ Outstanding Rejections Feedback Files will contain rejections related to names, addresses, year of birth and EIN generated prior to Phase 1A that remain unrepaired.

Rejections Feedback– Spec Updates

▶ For Phase 1A:

- Per Draft CAT Alert 2026-01, Industry Members and CAT Reporting Agents are not required to repair outstanding rejections related to names, addresses, years of birth, EINs and *updateNotification*.
- *addrType* and *authTraderNameID* remain in feedback files for related rejections generated prior to Phase 1A that remain unrepaired; these fields will be null for related rejection feedback generated effective with Phase 1A.
- Outstanding rejection feedback examples were updated.
- Error codes related to names, addresses, years of birth and EIN were retired (34 total).
- Error Codes 21009 and 21509 were retired (related to limits on web submissions).
- New Error Code 22078 (related to Open Issue C2025-01) *to be deployed to the Production Environment in Phase 1B*.

▶ For Phase 1B:

- FINRA CAT plans to automatically reconcile outstanding rejections related to names, addresses, years of birth, EINs and *updateNotification*.
- *addrType* and *authTraderNameID* will be removed from Outstanding Rejections Feedback.
- Error codes related to names, addresses, years of birth and EIN will be removed.

Phase 1 A: Other Technical Specification Changes

- ▶ Changes to conform with the Amendment:
 - Customer Reference Data
 - Account Reference Data
 - Reference Data File (instead of CAIS Data File).
- ▶ Conformed usage of “Customer” and “CAT Customer” to “CAT Customer”.
- ▶ Removed any outdated guidance, including Section 3.6 which described the transition from the LTID phase to the full Customer reporting phase.

Phase 1A: Other Technical Specification Changes

- ▶ Some items from Section 5.1.3 and 5.1.4 were:
 - Moved to other sections within the Spec to complete the guidance and make it easier to find.
 - Deleted because they were:
 - No longer applicable effective with Phase 1A
 - Duplicative of guidance located in other sections of the Spec.

Other Published Guidance Updates

- ▶ Draft CAT Alert 2026-01
- ▶ Reference Database Schema for Phase 1A
- ▶ Reference Database Scenarios
- ▶ Reference Database Reporter Portal User Guide
- ▶ FAQs

Planned Updates for Phase 1B

Phase 1 B: Planned Submission Changes (slide 1 of 4)

- ▶ *Industry Members will **not** be required to make a full resubmission to the Reference Database.*
- ▶ Effective with Phase 1B, this field value will be updated and will reject if populated with a different value:

JSON Object Level	Field Name	New Allowable Value
Main	<i>version</i>	1.0.0

Phase 1 B: Planned Submission Changes (slide 2 of 4)

- ▶ Effective with Phase 1B, these fields will be removed from the schema and will reject if submitted:

JSON Object Level	Field Name
FDID Record	<i>accountName</i> <i>addressList</i> <i>addrType</i> <i>addrLine1</i> <i>addrLine2</i> <i>addrLine3</i> <i>addrLine4</i> <i>city</i> <i>regionCode</i> <i>countryCode</i> <i>postalCode</i> <i>authTraderNamesList</i> <i>authTraderNameID</i> <i>authTraderName</i>

Phase 1 B: Planned Submission Changes (slide 3 of 4)

- ▶ Effective with Phase 1B, these fields will be removed from the schema and will reject if submitted:

JSON Object Level	Field Name
Natural Person Customer Record	<i>firstName</i> <i>middleName</i> <i>lastName</i> <i>nameSuffix</i> <i>doingBusinessAs</i> <i>yearOfBirth</i> <i>addressList</i> <i>addrType</i> <i>addrLine1</i> <i>addrLine2</i> <i>addrLine3</i> <i>addrLine4</i> <i>city</i> <i>regionCode</i> <i>countryCode</i> <i>postalCode</i> <i>updateNotification</i>

Phase 1 B: Planned Submission Changes (slide 4 of 4)

- ▶ Effective with Phase 1B, these fields will be removed from the schema and will reject if submitted:

JSON Object Level	Field Name
Legal Entity Customer Record	<i>legalName</i> <i>addressList</i> <i>addrType</i> <i>addrLine1</i> <i>addrLine2</i> <i>addrLine3</i> <i>addrLine4</i> <i>city</i> <i>regionCode</i> <i>countryCode</i> <i>postalCode</i> <i>ein</i> <i>updateNotification</i>

Other Planned Updates for Phase 1 B

- ▶ The Reference Data Filename will change:
 - The File Kind must be set to 'REF'.
 - Example of a Reference Data Filename: 123_999_20270101_**REF**_000123.json.bz2
- ▶ The SFTP Directories for submission and feedback will be updated:
 - /submitterID/cat/cais/upload: The new directory will be located at **/submitterID/cat/ref/upload**
 - /submitterID/cat/cais/feedback: The new directory will be located at **/submitterID/cat/ref/feedback**
- ▶ Appendix E will be updated to remove the Postal Code Formatting, Region Code and Region Description information.

Phase 1 B Recap

- ▶ Effective December 7, 2026* in the Production Environment:
 - Only files properly formatted for Reference Database schema *version* 1.0.0 will be accepted.
 - Only properly named Reference Data Files will be accepted. The only acceptable value for File Kind will be 'REF'. There are no changes the Transformed Identifiers Filename.
 - For SFTP submitters, submissions must be posted to /submitterID/cat/ref/upload.

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Q&A

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