

Reference Database Reporting Scenarios

7/30/2026

Version 1.0.0

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Executive Summary

This document is a companion document to the [Reference Database Technical Specifications \("Technical Specifications"\)](#) and is provided to assist Industry Members in implementing the reporting requirements laid out in the Technical Specifications. This document illustrates the specific reporting requirements for Customer reference data and Account reference data.

This document contains interpretive guidance for Industry Members with respect to how the Technical Specifications must be implemented. As such, any changes to this document are subject to the same review and approval process by the Operating Committee, pursuant to the CAT NMS Plan, as the Technical Specifications.

Table 1: Revision / Change Process

Version	Date	Author	Description
1.0.0	7/30/2026	Consolidated Audit Trail, LLC	Initial Publication

1. Introduction

This document is organized by reporting scenarios. For each scenario, a description of the scenario is provided and then is followed by specific JSON examples, illustrating the correct values to be populated for each field. All examples are illustrative and do not identify all applicable fields.

Industry Members are not required to change their books and records and/or business processes to conform with the scenarios depicted in the Reference Database Reporting Scenarios document. In recognition of the variety of account structures, Customer roles and business practices, etc., the Reference Database is flexible and can handle a number of reporting structures and business processes. The Reference Database Reporting Scenarios document does not depict all possible Reference Database reporting scenarios and is not intended to suggest that these are the only ways Industry Members can report to the Reference Database. It is important to note that Industry Members must adhere to the reporting requirements as set forth in the [Reference Database Technical Specifications](#).

All data used for examples in the Reference Database information reports are purely fictional and for illustrative purposes only. Any resemblance to actual persons or organizations is purely coincidental.

All Transformed Identifiers (“TIDs”) included in the examples for Social Security Numbers, Individual Taxpayer Identification Numbers, or Employer Identification Numbers (collectively, SSN/ITIN and EIN), are generated from values that are outside of the acceptable range of assignment by the assigning body, and would fail CAT data validations if actually reported to the Reference Database.

2. FDID Data Examples

This section illustrates sample scenarios for reporting Account reference data, including required reference data for associated customers, in the Reference Database JSON format. Each scenario includes a brief description and examples of the reference data for inclusion in the Reference Data File and Transformed Identifiers (TIDs) File. Refer to Section 4 of the [Reference Database Technical Specifications](#) for additional information.

2.1. FDID Record Data

2.1.1. Reporting of FDID Open Date and FDID Type

2.1.1.1. Account FDIDs

This scenario illustrates the CAT reporting requirements when the FDID represents an account. For FDIDs with an *fdidType* of 'ACCOUNT', the *fdidDate* represents the date on which the account was opened, or the Account Effective Date as defined in Section 1.1 of the CAT NMS Plan. The *accountType* describes the type(s) of account the FDID represents.

In this example, the Industry Member submits an account which was opened on July 1, 2020. The Industry Member also reports one CAT Customer, who is the account holder.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A2042", "fdidType": "ACCOUNT", "accountType": ["MARGIN"], "branchOfficeCRD": 99999, "clearingBrokerID": ["1234"], "fdidDate": 20200701, "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20200701 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }] }</pre>
TIDs	{

File	Data
	<pre> "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "c68a96c6f6f640bb9b51bf406695d5668b1fe675f1c63cdc9d5257fb92e9b509" }] } </pre>

2.1.1.2. Relationship FDIDs

This scenario illustrates the CAT reporting requirements when the FDID represents a Relationship ID. The *fdidType* must be 'RELATIONSHIP', and the *accountType* array must include 'RELATIONSHIP' (and any other applicable values). In addition, since the *fdidType* for the FDID is 'RELATIONSHIP', the *role* of the associated CAT Customer must be 'TRDHOLDER'. The *fdidDate* will be the date on which the relationship was established.

In this example, the Industry Member submits a Relationship ID FDID which was established on August 1, 2020. The Industry Member also reports one CAT Customer, who is the organization with which the relationship was established.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "REL9301", "fdidType": "RELATIONSHIP", "accountType": ["RELATIONSHIP"], "branchOfficeCRD": 12345, "fdidDate": 20200801, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20200801 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }] } </pre>

File	Data
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "e1109c873ffcc2edd7404819a6b8981638197aef5638c60bd0cfdb66b2585097" }] }</pre>

2.1.1.3. Entity ID FDIDs

This scenario illustrates the CAT reporting requirements when the FDID represents an Entity ID. An *fdidType* of 'ENTITYID' must only be used when an employee of the Industry Member is exercising discretion over multiple client accounts and creates an aggregated order for which a trading account number of the Industry Member is not available at the time of order origination. Refer to [FAQ M15](#) for additional information regarding Entity IDs. The *fdidType* will be 'ENTITYID', and the *accountType* array must include 'ENTITYID' (and any other applicable values). In addition, since the *fdidType* for this FDID is 'ENTITYID', the *role* of the associated CAT Customer must be 'TRDHOLDER'.

In this example, the Entity ID was established on September 1, 2012 and this date is used as the *fdidDate*. The Industry Member must also report itself as a CAT Customer associated to the FDID.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA0448", "fdidType": "ENTITYID", "accountType": ["ENTITYID", "FIRM"], "fdidDate": 20120901, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20200901 }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["BD"] }] }] }</pre>
TIDs	{

File	Data
	<pre> "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "b576d37c9667b8de41cb8781051163cacda0a6bdb244612d0a7f0b9cd1c40ea1" }] </pre>

2.1.2. Ending an FDID

This scenario illustrates the CAT reporting requirements when an account was previously submitted to, and accepted by, the Reference Database, but the account was subsequently closed. The Industry Member must submit the FDID Record with an *fdidEndDate* and *fdidEndReason* populated. The Industry Member may explicitly end any CAT Customer associations by including the *roleEndDate* and *roleEndReason*. Alternatively, the Industry Member may implicitly end any CAT Customer associations by omitting them from the ending submission. In that scenario, the *fdidEndDate* will be applied as the *roleEndDate* and the *fdidEndReason* will be applied as the *roleEndReason*.

When ending an FDID Record that was previously accepted with one or more CAT Customers, Industry Members are not required to include the *fdidCustomerList* in the ending submission. In the scenario where the *fdidCustomerList* is omitted from the ending submission, the *fdidEndReason* will be applied as the *roleEndReason*. If the *role* is ended for a reason that differs from the *fdidEndReason*, then the Industry Member must explicitly end the CAT Customer's *role* by including the *fdidCustomerList* and all required attributes of the list.

In this example, the Industry Member must populate an *fdidEndReason* of 'ENDED' for the closed account. In addition, the Industry Member implicitly ends all CAT Customer associations by omitting the *fdidCustomerList* from the ending submission. Because there are no CAT Customers in the Reference Data File, the *tidRecordList* in the Transformed Identifiers file is empty.

Ending Submission

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA7774", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidEndDate": 20220814, "fdidEndReason": "ENDED", "fdidDate": 20080710, </pre>

File	Data
	<pre> "clearingBrokerID": ["1234"] }] } </pre>
TIDs	<pre> { "tidRecordList": [] } </pre>

2.1.3. Ending an FDID Erroneously Reported to the Reference Database

This scenario illustrates the CAT reporting requirements when an account was previously submitted to, and accepted by, the Reference Database, but the record was not required to be reported to the Reference Database. For this scenario, the Industry Member must resubmit the FDID Record with an *fdidEndReason* of 'CORRECTION'. In addition, the *fdidEndDate* must be the same as the *fdidDate* to indicate that the FDID Record should never have been submitted to the Reference Database.

When ending an FDID Record that was previously accepted with one or more CAT Customers, Industry Members are not required to include the *fdidCustomerList* in the correcting submission. In the scenario where the *fdidCustomerList* is omitted from the correcting submission, the *fdidEndReason* will be applied as the *roleEndReason*. If the *role* is ended for a reason that differs from the *fdidEndReason*, the Industry Member must explicitly end the CAT Customer's *role* by including the *fdidCustomerList* and all required attributes of the list.

In this example, the Industry Member must populate the *fdidEndReason* with 'CORRECTION', and the *fdidEndDate* must be the same as the *fdidDate* to indicate that the FDID Record was not required to be reported to the Reference Database.

Correcting Submission

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA1957", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "branchOfficeCRD": 12345, "fdidEndDate": 20090815, "clearingBrokerID": ["1234"], "fdidEndReason": "CORRECTION", "fdidDate": 20090815 }] } </pre>

File	Data
TIDs	<pre>{ "tidRecordList": [] }</pre>

2.1.4. FDID Replaced by Another FDID Within the Same Industry Member

This scenario illustrates the CAT reporting requirements when an account was previously submitted to, and accepted by, the Reference Database, and the account remains open at the Industry Member. However, due to one of the limited circumstances outlined in [FAQ M1](#), the Industry Member is required to change the *firmDesignatedID* value representing the account to a different FDID within its system. In this example, nothing about the account is changing except the FDID value itself – as such, the original *fdidDate* and *roleStartDate* from the replaced FDID must be used.

Original Submission

In the original submission, the Industry Member reports a firm-owned account which was opened on May 29, 2016. The Industry Member reports itself as the CAT Customer associated to the account.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA7484", "fdidType": "ACCOUNT", "accountType": ["FIRM"], "branchOfficeCRD": 12345, "fdidDate": 20160529, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20160529 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["BD"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ </pre>

File	Data
	<pre> "customerRecordID": 1, "tidType": "EIN", "tidValue": "fb14cd74537abf7c12ecb9c8fb73ceca416c6247fa31c6a205f9b5b57c768549" }] }</pre>

Updating Submission

In order to replace the FDID, the Industry Member must submit the FDID Record with an *fdidEndReason* of 'REPLACED' and include the *replacedByFDID* field populated with the replacing FDID value. The *replacedByFDID* value included in a submission file must reference an FDID that is either included in the current submission file or was accepted by the Reference Database in a prior submission file.

The Industry Member may explicitly end any CAT Customer associations by including the *roleEndDate* and *roleEndReason*. Alternatively, the Industry Member may implicitly end any CAT Customer associations by omitting them from the updating submission. In that scenario, the *fdidEndDate* will be applied as the *roleEndDate* and the *fdidEndReason* will be applied as the *roleEndReason*. When replacing an FDID, Industry Members are not required to include the *fdidCustomerList*.

CAT Customer associations will not be moved to the replacing FDID Record, thus the Industry Member must explicitly establish the Customer-to-FDID associations to the replacing FDID.

In this example, *firmDesignatedID* 'IA7484' is being replaced with 'IA0005'. The Industry Member explicitly ends the CAT Customer's *role* on the replaced FDID by including the *roleEndDate* and *roleEndReason* of 'REPLACED'. In addition, the Industry Member includes the replacing FDID Record in the same submission file as the replaced FDID Record. The Industry Member reports a *roleStartDate* of July 10 2021 because that is the date on which the CAT Customer entered into the *role* of 'TRDHOLDER' on the new FDID, 'IA0005'.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA7484", "fdidType": "ACCOUNT", "accountType": ["FIRM"], "branchOfficeCRD": 12345, "fdidEndDate": 20210710, "fdidEndReason": "REPLACED", "replacedByFDID": "IA0005", "fdidDate": 20160529, "clearingBrokerID": ["1234"], "fdidCustomerList": [</pre>

File	Data
	<pre> { "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20160529, "roleEndDate": 20210710, "roleEndReason": "REPLACED" }], { "fdidRecordID": 2, "firmDesignatedID": "IA0005", "fdidType": "ACCOUNT", "accountType": ["FIRM"], "branchOfficeCRD": 12345, "fdidDate": 20210710, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20210710 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["BD"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "fb14cd74537abf7c12ecb9c8fb73ceca416c6247fa31c6a205f9b5b57c768549" }] } </pre>

2.1.5. Reopening an Erroneously Ended FDID

This scenario illustrates the CAT reporting requirements when an FDID Record was previously submitted to, and accepted by, the Reference Database, and erroneously ended for a reason other than 'REPLACED' in a later submission. Upon discovering that the FDID Record was erroneously ended, the Industry Member must report the FDID's correct status to the Reference Database. This is accomplished by excluding the *fdidEndDate* and *fdidEndReason* fields within the correcting submission, which will nullify

these fields and reflect the FDID's correct status in the Reference Database. Also in the correcting submission, the Industry Member must reestablish any necessary Customer-to-FDID associations.

In this example, the Industry Member erroneously ended an FDID Record in the Reference Database when the underlying account was never closed. The Industry Member submits the same FDID Record that was previously submitted, but this time omits the *fdidEndDate* and *fdidEndReason* fields.

Ending Submission with Erroneous FDID End Reason and FDID Date

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A3019", "fdidType": "ACCOUNT", "accountType": ["INSTITUTION", "FIRM"], "branchOfficeCRD": 12345, "fdidDate": 20210706, "clearingBrokerID": ["1234"], "fdidEndDate": 20220815, "fdidEndReason": "ENDED", "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20210706 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["BD"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "12450da283530a402df4e624992ca69f3f9d3921660256d17388f23e18a7cc0f" }] }</pre>

Correcting Submission with Omitted FDID End Reason and FDID Date

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A3019", "fdidType": "ACCOUNT", "accountType": ["INSTITUTION", "FIRM"], "branchOfficeCRD": 12345, "fdidDate": 20210706, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20210706 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["BD"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "12450da283530a402df4e624992ca69f3f9d3921660256d17388f23e18a7cc0f" }] }</pre>

2.1.6. Repairing an FDID rejection due to rejected CAT Customer

This scenario illustrates the CAT reporting requirements when an FDID has been rejected due to one or more of its associated Customer Records being rejected. If any associated Customer Records have an error, the Reference Database cannot accept any FDIDs associated to the CAT Customer because associated CAT Customer data has not been accepted into the Reference Database.

Original Submission with Error

The Customer Record associated to the FDID is rejected due to an invalid *customerType* (Error Code 22524) since the field was populated with "N/A", which is not an allowable value (however,

“NOTAPPLICABLE” is an allowable value). Since one of its associated Customer Records was rejected, the FDID is rejected as well (Error Code 22048). Both errors are resolved by correcting the *customerType* and resubmitting the entire FDID Record in its current state with all required CAT Customer associations.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A4029", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20060519, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20060519 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["N/A"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "2500fd15875fd8988cf9e1ef4b9e23a83ee157357274d633dfad5b3dad4ca48e" }] }</pre>

Repairing Submission

In this submission, the firm repairs the Customer Record rejection by reporting a valid *customerType*. This also results in resolution of the FDID rejection because all its CAT Customers are accepted into the Reference Database. The Industry Member is not required to provide the *rejectionID* or a *correctionList* since resubmission of the record with valid data will resolve the rejection.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A4029", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20060519, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20060519 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "2500fd15875fd8988cf9e1ef4b9e23a83ee157357274d633dfad5b3dad4ca48e" }] }</pre>

2.1.7. Repairing an FDID Data Type Violation Error

This scenario illustrates the CAT Reporting requirements when an attribute of a submitted FDID violates the prescribed data type for the field. The error can be repaired by resubmitting the FDID Record with the correct data type for the field which encountered the error.

Submission with Error

In this submission, the *fdidDate* field is in a Text format with double quotes instead of the prescribed Data format for the Date data type. This causes the FDID Record to be rejected due to a data type violation (Error Code 22034) and an invalid *fdidDate* (Error Code 22007). The Customer Record is also rejected because the FDID was rejected (Error Code 22523).

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A3633", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": "20020319", "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20020319 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "568ca6d8af479889d124c329061ea0762a9c87abc3c80fddb659804477531e1a" }] }</pre>

Repairing Submission

In the resubmission, the user removes the double quotes from the *fdidDate* value and resubmits the FDID Record with the required CAT Customer association. This resolves all three rejections associated to the record.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A3633", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20020319, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20020319 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "568ca6d8af479889d124c329061ea0762a9c87abc3c80fddb659804477531e1a" }] }</pre>

2.2. FDID Customer List and Roles

This section illustrates the CAT reporting requirements for FDID Customer Records within the *fdidCustomerList*. For each FDID, the *fdidCustomerList* object is used to describe the type of association that exists between the FDID and its CAT Customer(s).

2.2.1. FDID with a Single CAT Customer

This scenario illustrates the CAT reporting requirements for an account associated to one CAT Customer, who is the account holder.

In this example, the Industry Member submits an FDID with one account holder who has authorization to trade on the account.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A2449", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "branchOfficeCRD": 99999, "fdidDate": 20190812, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20190812 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "a783be7f766ff571c7a2181d86ff949054b92a6ca0d7b9b4b8c43226f4beb368" }] }</pre>

2.2.2. FDID with Multiple CAT Customers

This scenario illustrates CAT reporting requirements for an account associated to multiple CAT Customers who are holders of the account.

In this example, the Industry Member submits an FDID with one account holder who has trading authorization, and another holder who does not have trading authorization.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A3106", "fdidType": "ACCOUNT", "accountType": ["UGMA/UTMA"], "branchOfficeCRD": 99999, "fdidDate": 20151101, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20151101 }, { "customerRecordID": 2, "role": "NTHOLDER", "roleStartDate": 20151101 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 2, "customerType": ["NOTAPPLICABLE"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "4932e10355dea95f31fbd77989b09aa641c49d3df28e7074ae5335e94f61d43f" }, { "customerRecordID": 2, "tidType": "SSN/ITIN", "tidValue": "7db347e0258d221252ca1f9e5e5913865f2c14f47b15ddefd0870edab89937e7" }] }</pre>

2.3. Mass Transfer of FDIDs Across Industry Members

This section illustrates the CAT reporting requirements in the instance of account transfers from one Industry Member to another, resulting from corporate events such as mergers and acquisitions, divestitures, and other events. In a Mass Transfer scenario, the transferring firm must report the ending of the accounts to be transferred, while the receiving firm must report the Industry Member CRD of the transferring firm and the FDID by which the account was known at the transferring firm. Refer to [FAQ X8](#) for additional information.

2.3.1. Transferring Industry Member Submission

This scenario illustrates the CAT reporting requirements for the transferring Industry Member when it was acquired by another Industry Member. In order to enact transfers of accounts, the transferring Industry Member must end the FDID by setting the *fdidEndReason* as 'TRANSFER'. The *fdidEndDate* represents the date on which the transfer occurred. Unless specified otherwise, any CAT Customer associations to the FDID will be ended with the *fdidEndDate* as the *roleEndDate* and the *fdidEndReason* as *roleEndReason*.

In this example, the transferring Industry Member submits three accounts with *fdidEndDates*, and *fdidEndReasons* of 'TRANSFER'. Any Active Accounts must also be reported to the Reference Database by the Industry Member to whom the accounts are being transferred, as represented in Reporting Scenario 2.3.2: Receiving Industry Member Submission. Refer to [FAQ X8](#) for additional information.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "TransferredAcct1", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidEndDate": 20210718, "fdidEndReason": "TRANSFER", "fdidDate": 20110220, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20110220 }] }, { "fdidRecordID": 2, "firmDesignatedID": "TransferredAcct2", "fdidType": "ACCOUNT", "accountType": ["OTHER"],</pre>

File	Data
	<pre> "fdidEndDate": 20210718, "fdidEndReason": "TRANSFER", "fdidDate": 20040728, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20040728 }] }, { "fdidRecordID": 3, "firmDesignatedID": "TransferredAcct3", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidEndDate": 20210718, "fdidEndReason": "TRANSFER", "fdidDate": 19990823, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 3, "role": "TRDHOLDER", "roleStartDate": 19990823 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }], "legalEntityCustomerList": [{ "customerRecordID": 2, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 3, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "22ed0a9add2445b711c6a4d1c2fd1962d4c3ec9a77e9473b7789e2c5394cecac" }], </pre>

File	Data
	<pre> { "customerRecordID": 2, "tidType": "EIN", "tidValue": "fcf73b27ad39f7f4c443819ed240a921905baba8c0b7880244d287a832d9db5b" }, { "customerRecordID": 3, "tidType": "EIN", "tidValue": "ffa8a6ca8d04188ae7c0368cc52b908a2e12b1c95d5708b3699c6a83b7e24011" }] </pre>

2.3.2. Receiving Industry Member Submission

This scenario illustrates the CAT reporting requirements for the receiving Industry Member when it has acquired another Industry Member. The receiving Industry Member must submit all Active Accounts that it acquired with full data, including reestablishing applicable CAT Customer associations. The receiving Industry Member must report in its submission file the *firmDesignatedID* it has assigned to the Account, the CRD of the transferring Industry Member as the *priorCATReporterCRD* value, and must also provide the FDID value assigned to the acquired Account by the transferring Industry Member as the *priorCATReporterFDID*. Both the *priorCATReporterCRD* and *priorCATReporterFDID* fields must be included in all subsequent submissions of the FDID Record, unless the FDIDs are later replaced.

In this example, the Industry Member submits three accounts it received from the Transferring Industry Member in [Reporting Scenario 2.3.1: Transferring Industry Member Submission](#). Refer to [FAQ X8](#) for additional information.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "ReceivedAcct1", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20210718, "clearingBrokerID": ["1234"], "priorCATReporterCRD": 5555, "priorCATReporterFDID": "TransferredAcct1", "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20210718 }] }] } </pre>

File	Data
	<pre> }, { "fdidRecordID": 2, "firmDesignatedID": "ReceivedAcct2", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "clearingBrokerID": ["1234"], "priorCATReporterCRD": 5555, "priorCATReporterFDID": "TransferredAcct2", "fdidDate": 20210718, "fdidCustomerList": [{ "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20210718 }] }, { "fdidRecordID": 3, "firmDesignatedID": "ReceivedAcct3", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "priorCATReporterCRD": 5555, "priorCATReporterFDID": "TransferredAcct3", "fdidDate": 20210718, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 3, "role": "TRDHOLDER", "roleStartDate": 20210718 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }], "legalEntityCustomerList": [{ "customerRecordID": 2, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 3, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [</pre>

File	Data
	<pre> { "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "22ed0a9add2445b711c6a4d1c2fd1962d4c3ec9a77e9473b7789e2c5394cecac" }, { "customerRecordID": 2, "tidType": "EIN", "tidValue": "fcf73b27ad39f7f4c443819ed240a921905baba8c0b7880244d287a832d9db5b" }, { "customerRecordID": 3, "tidType": "EIN", "tidValue": "ffa8a6ca8d04188ae7c0368cc52b908a2e12b1c95d5708b3699c6a83b7e24011" } } </pre>

2.4. Clearing Firm Reporting Custodied Accounts

2.4.1. Clearing Firm Reporting Accounts Custodied for Two Correspondents

This scenario illustrates a clearing firm's CAT reporting requirements for accounts it custodies for two different correspondents. The clearing firm must populate the *correspondentCRD* field with the CRD number of the correspondent firm. The *correspondentCRD* field is at the main level within the JSON structure of the Reference Data File, and as such will apply to all records within the file. The *correspondentCRD* field must not be included in the Transformed Identifiers File. If the clearing firm custodies accounts for multiple correspondent firms, accounts for each individual correspondent must be grouped into a separate file.

The *correspondentCRD* field is populated by clearing firms with introducing brokers or correspondents when reporting Accounts to the Reference Database that are custodied for their introducing brokers/correspondents, including DVP/RVP accounts. Accounts of a clearing firm that are not correspondent accounts should not have the *correspondentCRD* field populated.

Clearing firms and introducing brokers/correspondents have their own separate and distinct Reference Database reporting obligation. For examples of correspondent submissions, refer to [Scenario 2.4.2: Clearing Firm & Introducing Broker Reporting Custodied Account](#).

In this example, the clearing firm submits two accounts – one custodied for a correspondent firm with a CRD of '1111', and one custodied for a different correspondent firm with a CRD of '9999' - in two separate submissions with the header of each submission file containing the CRD number of the respective

correspondent. The clearing firm also reports one account holder for each account.**Clearing Firm's Submission for Account it Custodies for Correspondent 1111**

File	Data
Data	<pre>{ "version": "1.0.0", "catReporterCRD": 123456, "catSubmitterID": 123456, "correspondentCRD": 1111, "fdidRecordCount": 1, "naturalPersonCustomerRecordCount": 0, "legalEntityCustomerRecordCount": 1, "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A0012", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20200701, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20200701 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["BD"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "803207d07b157664fbeab894cf97b4b55d2d1d80d04c927a6e5a85699f288f3e" }] }</pre>

Clearing Firm's Submission for Account it Custodies for Correspondent 9999

File	Data
Data	<pre>{ "version": "1.0.0", "catReporterCRD": 123456,</pre>

File	Data
	<pre> "catSubmitterID": 123456, "correspondentCRD": 9999, "fdidRecordCount": 1, "naturalPersonCustomerRecordCount": 0, "legalEntityCustomerRecordCount": 1, "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA0013", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20190821, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20190821 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["BD"] }] </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "79f5bbfd2722ee984f4e57555cae03545deaf207c7acab6933001662f01ea0dc" }] } </pre>

2.4.2. Clearing Firm & Introducing Broker Reporting Custodied Account

Clearing firms and introducing brokers have their own separate and distinct Reference Database reporting obligations. This scenario illustrates the CAT reporting requirements when an account is in the custody of a clearing firm ("Clearing Firm") but originates orders through an introducing broker ("Introducing Broker").

In this example, each Industry Member reports the account with the FDID assigned by its respective firm. The Clearing Firm reports the Introducing Broker's CRD in the *correspondentCRD* field, and reports the

Introducing Broker's customer as the associated CAT Customer. The Introducing Broker does not provide a *correspondentCRD*, and reports one CAT Customer associated to the FDID.

Clearing Firm Submission

File	Data
Data	<pre>{ "version": "1.0.0", "catReporterCRD": 123456, "catSubmitterID": 123456, "correspondentCRD": 55555, "fdidRecordCount": 1, "naturalPersonCustomerRecordCount": 0, "legalEntityCustomerRecordCount": 1, "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A6650", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20130428, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20130428 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "7b1599709a6bb3cce97df911d58abf8303aca660e309dc12639c15921ab0e6dd" }] }</pre>

Introducing Broker Submission

File	Data
Data	<pre>{ "version": "1.0.0", "catReporterCRD": 55555, "catSubmitterID": 55555, "fdidRecordCount": 1, "naturalPersonCustomerRecordCount": 0, "legalEntityCustomerRecordCount": 1, "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "ACCT734923", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20130428, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20130428 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "7b1599709a6bb3cce97df911d58abf8303aca660e309dc12639c15921ab0e6dd" }] }</pre>

3. CAT Customer Data Scenarios

This section illustrates sample scenarios for reporting CAT Customer reference data in the Reference Database JSON format. At least one CAT Customer must be associated to each FDID within a submission file, and CAT Customers cannot be reported to the Reference Database without being associated with at least one FDID Record. Each scenario will include a brief description and examples of the data for inclusion in the Reference Data File and Transformed Identifiers (TIDs) File. Refer to Section 4 of the [Reference Database Technical Specifications](#) for additional information.

3.1. Natural Person Customer

For Reference Database reporting purposes, any CAT Customer whose *tidType* is 'SSN/ITIN' must be reported to the Reference Database in the *naturalPersonCustomerList*, even if the natural person is not the account holder. Examples include but are not limited to accounts owned by a trust or sole proprietor where the *tidType* is 'SSN/ITIN'. Additionally, CAT Customers with a *foreignTIDType* value that is only usable for Natural Person CAT Customers ('DRIVERLICENSE', 'PASSPORT' or 'PERMANENT') must also be reported in the *naturalPersonCustomerList*. In these scenarios, the Industry Member must populate all required fields for the *naturalPersonCustomerList*. Failure to include the required fields will result in a rejection of the Customer Record and, ultimately the FDID Record. In addition, if *tidType* is 'SSN/ITIN' or *foreignTIDType* is 'DRIVERLICENSE', 'PASSPORT' or 'PERMANENT', and the CAT Customer is not in the *naturalPersonCustomerList*, the FDID Record will reject.

3.1.1. Trust Using a Social Security Number

This scenario illustrates the CAT reporting requirements when the account holder is a trust and the *tidType* is 'SSN/ITIN'.

In this example, the CAT Customer is a trust reported to the Reference Database with an SSN as the Input Identifier. The *customerType* must include 'TRUST' and all other applicable allowable values as they pertain to the trust.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A7758", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "branchOfficeCRD": 12345, "fdidDate": 20090312, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER",</pre>

File	Data
	<pre> "roleStartDate": 20090312 }] }, "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["TRUST"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "56c4d1ee2fa66991602dc80580116d195ca362d7a0b5647fea17f3e104c97944" }] } </pre>

3.1.2. Sole Proprietorship Using a Social Security Number

This scenario illustrates the CAT reporting requirements when the account holder is a sole proprietorship and the *tidType* is 'SSN/ITIN'.

In this example, the CAT Customer is a sole proprietorship reported to the Reference Database with an SSN as the Input Identifier. The *customerType* must include all applicable allowable values as they pertain to the sole proprietorship.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A3013", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20150129, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20150129 }] }] } </pre>

File	Data
	<pre>"naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }]</pre>
TIDS	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "fe005258ee2114bcef531e2ff09d1fa3aea5a33dd2b32ee045d028d323386b1f" }] }</pre>

3.1.3. Multiple Trusts and a Natural Person Using the Same Social Security Number

This scenario illustrates the CAT reporting requirements when a Natural Person and two trusts are all CAT Customers associated with the same FDID and the Tax Identifier of the two trusts is the same as the Natural Person's Social Security Number (SSN).

Each CAT Customer must only have one active role in association to the FDID at a time. Therefore, an attempt to associate two or more active CAT Customers with the same SSN to the same FDID will result in a rejection. When multiple trusts and a Natural Person have the same Tax Identifier (i.e., SSN) and are all CAT Customers associated to the same FDID, Industry Members must report only one of the trusts. The trust must be reported in the *naturalPersonCustomerList* with *customerType* including 'TRUST' and any other applicable values as they pertain to the trust. The trust must be identified in a *role* of 'TRDHOLDER', which indicates that the CAT Customer is a holder of the account that also has authorization to trade on the account. The Plan Participants are not prescribing a specific methodology for which trust must be reported to the Reference Database, and any methodology must be applied consistently by the Industry Member.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A3618", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "branchOfficeCRD": 12345, "fdidDate": 20120102, "clearingBrokerID": ["1234"], </pre>

File	Data
	<pre> "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20120102 }] }, "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["TRUST"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "568ca6d8af479889d124c329061ea0762a9c87abc3c80fddb659804477531emt" }] } </pre>

3.1.4. Multiple Sole Proprietorships and Natural Person Using the Same Social Security Number

This scenario illustrates the CAT reporting requirements when a Natural Person and two sole proprietorships are all CAT Customers associated with the same FDID and the Tax Identifier of the two sole proprietorships is the same as the Natural Person's Social Security Number (SSN).

Each CAT Customer must only have one active role in association to the FDID at a time. Therefore, an attempt to associate two or more active CAT Customers with the same SSN to the same FDID will result in a rejection. When multiple sole proprietorships and a Natural Person have the same Tax Identifier (i.e., SSN) and are all CAT Customers associated to the same FDID, Industry Members must report only one of the sole proprietorships in association to the FDID. The sole proprietorship must be identified in a *role* of 'TRDHOLDER', which indicates that the CAT Customer is a holder of the account that also has authorization to trade on the account. The Plan Participants are not prescribing a specific methodology for which sole proprietorship must be reported to the Reference Database, and any methodology must be applied consistently by the Industry Member.

File	Data
Data	{

File	Data
	<pre> "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A0049", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20150129, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20150129 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "568ca9d8af479889d124c329061ea0762a9c87abc3c80fddb659804477531jjh" }] } </pre>

3.1.5. Foreign Trust Using Foreign Input Identifier for Authorized Trader

This scenario illustrates the CAT reporting requirements when the account holder is a foreign trust where an allowable Input Identifier value does not exist because the foreign country or foreign municipality does not require or issue any kind of identifier for the foreign trust, and no such other allowable Input Identifier exists.

In this example, the account holder is a foreign trust that has no allowable Input Identifier because the foreign country or foreign municipality does not require or issue any kind of identifier; and no LEI is assigned to the entity. In addition, there is a trustee that is authorized to trade on the account. As outlined in [FAQ X16](#), the FDID Record may be reported to the Reference Database with no Customer Record for the foreign trust. However, all other CAT Customers (e.g., trustees that are Authorized Traders on the account) must be reported to the Reference Database with the *customerType* value of 'TRUST'.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "FOR49D73", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "branchOfficeCRD": 12345, "fdidDate": 20230314, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "AUTH3RD", "hasDiscretion": true, "roleStartDate": 20230314 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["TRUST"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "FOREIGN", "foreignTIDType": "DRIVERLICENSE", "foreignTIDCountryCd": "AU", "tidValue": "65a4d1cc2fa88661202eh80580116d195ca362d7a0b5647fea17f3e104c97543" }] } </pre>

3.2. Legal Entity Customer

For Reference Database reporting purposes, a Legal Entity is a CAT Customer whose Input Identifier used to generate the CAT Customer's TID is an EIN, or, for a Foreign Legal Entity, a National Registration or Tax Identifier, LEI or other Government-Issued Identifier issued by a non-national level government body or agency, such as a regional agency. These CAT Customers must be reported to the Reference Database in the *legalEntityCustomerList*.

3.2.1. Reporting a Legal Entity Customer

This scenario illustrates the CAT reporting requirements for Legal Entity CAT Customers. Required fields, such as *customerType*, must be included for each Legal Entity Customer Record in the Reference Data File.

In this example, the Industry Member is submitting to the Reference Database an FDID with an association to one Legal Entity Customer whose TID was generated from an EIN.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA0867", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "branchOfficeCRD": 12345, "fdidDate": 20120520, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20120520 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "8f77654dbff9c5ab28f187a6d01e55288beb25db9ffc358aec8f3b030cc6d190" }] }</pre>

3.3. Changes to CAT Customer Transformed Identifiers

3.3.1. Change in CAT Customer's Input Identifier – Same TID Type

This scenario illustrates the CAT reporting requirements when the Input Identifier that an Industry Member previously used to generate a CAT Customer's TID was legally changed and the type of Input Identifier used to generate the TID value (*tidType*) remained the same. If the CAT Customer is associated to more than one FDID at the Industry Member, the Industry Member must update the TID on all FDIDs that the CAT Customer is associated to. In addition, the Industry Member must explicitly end the CAT Customer's previous *role* by including a *roleEndDate* and *roleEndReason* of 'REPLACED'. When replacing a TID due to a legal change in Input Identifier, it is not permissible to omit the CAT Customer's previous *role*.

In this example, the Industry Member reports the CAT Customer to the Reference Database for the first time using the CAT Customer's ITIN as the Input Identifier. The CAT Customer is associated to three FDIDs. The CAT Customer subsequently gained U.S. citizenship and was assigned an SSN. The CAT Customer notified the Industry Member of its newly assigned SSN so the Industry Member must update the Customer Record on all three FDIDs. While the TID was legally changed from an ITIN to SSN, the type of Input Identifier used to generate the TID value ('SSN/ITIN') remained the same.

Original Submission with ITIN

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A0391", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "branchOfficeCRD": 12345, "fdidDate": 20120129, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20120129 }] }, { "fdidRecordID": 2, "firmDesignatedID": "1A0395", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20150916, "clearingBrokerID": ["1234"], "fdidCustomerList": [</pre>

File	Data
	<pre> { "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20150916 }] }, { "fdidRecordID": 3, "firmDesignatedID": "1A0397", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20190613, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20190613 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "04f1772c416e037c0c0be238a5245110675bb7c92e58d95e4dfe9cc503246edd" }] } </pre>

Updating Submission with SSN

The Industry Member must report the CAT Customer to the Reference Database with the new Input Identifier using the CAT Customer's SSN.

In the Reference Data file, the Industry Member must include (1) a record for the CAT Customer being replaced including a *roleEndDate* and *roleEndReason* of 'REPLACED' in the *fdidCustomerList* (these field values indicate the previous Customer Record is no longer associated to the FDID); and (2) a record for the replacing CAT Customer with the *roleStartDate*. In this example, the CAT Customer's *role* did not

change when the Input Identifier changed, so the *roleStartDate* must be the original date the CAT Customer entered into the *role* of 'TRDHOLDER'.

In the TIDs file, the Industry Member must include (1) the *customerRecordID* with the previous *tidType* and *tidValue*; the new TID Value in the *replacedByTID* field; and the new TID Type in the *replacedByTIDType* field; and (2) the *customerRecordID* with the new *tidType* and new *tidValue*.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A0391", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "branchOfficeCRD": 12345, "fdidDate": 20120129, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20120129, "roleEndDate": 20220831, "roleEndReason": "REPLACED" }, { "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20120129 }] }, { "fdidRecordID": 2, "firmDesignatedID": "1A0395", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20150916, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20150916, "roleEndDate": 20220831, "roleEndReason": "REPLACED" }, { "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20150916 }] }] } </pre>

File	Data
	<pre> }, { "fdidRecordID": 3, "firmDesignatedID": "1A0397", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20190613, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20190613, "roleEndDate": 20220831, "roleEndReason": "REPLACED" }, { "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20190613 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 2, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "04f1772c416e037c0c0be238a5245110675bb7c92e58d95e4dfe9cc503246edd", "replacedByTID": "ecacfeee4fb716eb7817e96288ccdfdf03ed7c85b1f4ba3052fe44dbd158195a", "replacedByTIDType": "SSN/ITIN" }, { "customerRecordID": 2, "tidType": "SSN/ITIN", "tidValue": "ecacfeee4fb716eb7817e96288ccdfdf03ed7c85b1f4ba3052fe44dbd158195a" }] } </pre>

3.3.2. Change in CAT Customer's Input Identifier – Differing TID Types

This scenario illustrates the CAT reporting requirements when the Input Identifier that an Industry Member previously used to generate a CAT Customer's TID was legally changed and the type of Input Identifier used to generate the TID value (*tidType*) changed as well. If the CAT Customer is associated to more than one FDID at the Industry Member, the Industry Member must update the TID on all FDIDs that the CAT Customer is associated to. In addition, the Industry Member must explicitly end the CAT Customer's previous *role* by including a *roleEndDate* and *roleEndReason* of 'REPLACED'. When replacing a TID due to a legal change in Input Identifier, it is not permissible to omit the CAT Customer's previous *role*.

In this example, the CAT Customer is a foreign Legal Entity which was previously reported to the Reference Database with an LEI as the Input Identifier. However, the foreign Legal Entity has expanded to the U.S., obtained an EIN and notified the Industry Member of its EIN. Since a U.S.-assigned Input Identifier is available for this CAT Customer, the Industry Member must report the CAT Customer to the Reference Database with the new Input Identifier.

In the Reference Data file, the Industry Member must include (1) a record for the CAT Customer being replaced including a *roleEndDate* and *roleEndReason* of 'REPLACED' in the *fdidCustomerList* (these field values indicate the previous Customer Record is no longer associated to the FDID); and (2) a record for the replacing CAT Customer with the *roleStartDate*. In this example, the CAT Customer's *role* did not change when the Input Identifier changed, so the *roleStartDate* must be original date the CAT Customer entered into the *role* of 'TRDHOLDER'.

In the TIDs file, the Industry Member must include (1) the *customerRecordID* with the previous *tidType*, *foreignTIDType* and *tidValue*; the new TID Value in the *replacedByTID* field; and the new TID Type in the *replacedByTIDType* field; and (2) the *customerRecordID* with the new *tidType* and new *tidValue*.

Original Submission with LEI

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A1839", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "branchOfficeCRD": 12345, "fdidDate": 20050712, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20050712</pre>

File	Data
	<pre> }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["FOREIGN"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "FOREIGN", "foreignTIDType": "LEI", "tidValue": "9ea1a76e5e52ae60e89912f66225e54c7da42e79791d5637822b69c75a210d83" }] } </pre>

Updating Submission with EIN

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A1839", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "branchOfficeCRD": 12345, "fdidDate": 20050712, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20050712, "roleEndDate": 20220831, "roleEndReason": "REPLACED" }, { "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20050712 }] }, { "legalEntityCustomerList": [{ </pre>

File	Data
	<pre> "customerRecordID": 1, "customerType": ["FOREIGN"] }, { "customerRecordID": 2, "customerType": ["BD"] }] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "FOREIGN", "foreignTIDType": "LEI", "tidValue": "9ea1a76e5e52ae60e89912f66225e54c7da42e79791d5637822b69c75a210d83", "replacedByTID": "d63633e6049236992117c19701210f84b6342aa76cd3a8c98dee1bdd783c84a2", "replacedByTIDType": "EIN" }, { "customerRecordID": 2, "tidType": "EIN", "tidValue": "d63633e6049236992117c19701210f84b6342aa76cd3a8c98dee1bdd783c84a2" }] } </pre>

3.3.3. Replacing Legal Change in EIN

This scenario illustrates the CAT reporting requirements for reporting a legal change in a CAT Customer's EIN.

Due to a merger, the Legal Entity CAT Customer's EIN value has changed and the CAT Customer notified the Industry Member of its updated EIN. Therefore, the originally reported TID value must be replaced.

The updated *tidValue* for the CAT Customer must be propagated across all FDID associations at the Industry Member.

Original Submission

File	Data
Data	<pre> { "fdidRecordList": [{ </pre>

File	Data
	<pre> "fdidRecordID": 1, "firmDesignatedID": "IA0019", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20190502, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20190502 }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "ffb84a69fcb89a4a5d07584a0d1bec5ee6ec4e258d5a1410d37277ec1130b785" }] } </pre>

Updating Submission

The Industry Member must report the CAT Customer to the Reference Database with the new Input Identifier. .

In addition, in the Reference Data file, the Industry Member must include a record for the replacing CAT Customer with the *roleStartDate*. In this example, the CAT Customer's *role* did not change when the Input Identifier changed, so the *roleStartDate* must be the original date the CAT Customer entered into the *role* of 'TRDHOLDER'. In addition, the Industry Member must explicitly end the CAT Customer's previous *role* by including a *roleEndDate* and *roleEndReason* of 'REPLACED'. When replacing a TID due to a legal change in Input Identifier, it is not permissible to omit the CAT Customer's previous *role* and the *roleEndDate* and *roleEndReason* must be populated.

In the TIDs file, the Industry Member must include (1) the *customerRecordID* with the previous *tidType* and *tidValue*; the new TID Value in the *replacedByTID* field; and the new TID Type in the *replacedByTIDType* field; and (2) the *customerRecordID* with the new *tidType* and new *tidValue*.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA0019", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20190502, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20190502, "roleEndDate": 20220712, "roleEndReason": "REPLACED" }, { "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20190502 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 2, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "ffb84a69fcb89a4a5d07584a0d1bec5ee6ec4e258d5a1410d37277ec1130b785", "replacedByTIDType": "EIN", "replacedByTID": "4c8f21e1d71b0d1520858ea4903a2212d82f8f3d2cf8f1beccc059388e3d3087" }, { "customerRecordID": 2, "tidType": "EIN", "tidValue": "4c8f21e1d71b0d1520858ea4903a2212d82f8f3d2cf8f1beccc059388e3d3087" }] } </pre>

File	Data
	<pre> }] }</pre>

3.3.4. Change in CAT Customer's Foreign Input Identifier - Same TID Type

This scenario illustrates the CAT reporting requirements for reporting a change in a CAT Customer's foreign Input Identifier when the *tidType* value ('FOREIGN') remains the same.

In this example, the Industry Member will use the *replacedByTID* functionality. If the *replacedByTIDType* is 'FOREIGN', the Industry Member is also required to populate the *replacingForeignTIDType* and *replacingForeignTIDCountryCd* fields.

If the CAT Customer is associated to more than one FDID at the Industry Member, the Industry Member must update the TID on all FDIDs that the CAT Customer is associated to. In addition, the Industry Member must explicitly end the CAT Customer's previous *role* by including a *roleEndDate* and *roleEndReason* of 'REPLACED'. When replacing a TID value due to a legal change in an Input Identifier, it is not permissible to omit the CAT Customer's previous role.

In this example, the CAT Customer has two accounts at the Industry Member and the Industry Member reports the CAT Customer to the Reference Database for the first time using the CAT Customer's driver's license as the foreign Input Identifier (*foreignTIDType* of 'DRIVERLICENSE'). Upon expiration of the driver license, the Industry Member is provided with the CAT Customer's valid passport and updates its books and records. The Industry Member must generate a new *tidValue* for the CAT Customer which must be reported to the Reference Database for all Customer-to-FDID associations at the Industry Member.

Original Submission with Driver License

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA1389", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20200907, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 23, "role": "TRDHOLDER", "roleStartDate": 20220907 }] }] }</pre>

File	Data
	<pre>] }, { "fdidRecordID": 2, "firmDesignatedID": "IA1390", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20190604, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 5, "role": "TRDHOLDER", "roleStartDate": 20190604 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 23, "customerType": ["FOREIGN"] }, { "customerRecordID": 5, "customerType": ["FOREIGN"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 23, "tidType": "FOREIGN", "foreignTIDType": "DRIVERLICENSE", "foreignTIDCountryCd": "CA", "tidValue": "fe68a21fc76bba7b3a3d8e454eca8cd258de68fd08dddf035f23ddbdce6fc049" }, { "customerRecordID": 5, "tidType": "FOREIGN", "foreignTIDType": "DRIVERLICENSE", "foreignTIDCountryCd": "CA", "tidValue": "fe68a21fc76bba7b3a3d8e454eca8cd258de68fd08dddf035f23ddbdce6fc049" }] } </pre>

Updating Submission

The Industry Member must report the CAT Customer to the Reference Database with the new Input Identifier using the CAT Customer's passport.

In the Reference Data File, the Industry Member must include (1) a record for the CAT Customer being replaced including a *roleEndDate* and *roleEndReason* of 'REPLACED' in the *fdidCustomerList* (these field values indicate the previous Customer Record is no longer associated to the FDID); and (2) a record for the replacing CAT Customer with the *roleStartDate*. In this example, the CAT Customer's *role* did not change when the Input Identifier changed, so the *roleStartDate* must be the original date the CAT Customer entered into the *role* of 'TRDHOLDER'.

In the Transformed Identifiers file, the Industry Member must include (1) the *customerRecordID* with the previous *tidType*, *foreignTIDType*, *foreignTIDCountryCd*, and *tidValue*, and the *replacedByTIDType*, *replacingForeignTIDType*, *replacingForeignTIDCountryCd* and *replacedByTID*; and (2) the *customerRecordID* with the new *tidType*, *foreignTIDType*, *foreignTIDCountryCd* and *tidValue*.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA1389", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20220907, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 23, "role": "TRDHOLDER", "roleStartDate": 20200907, "roleEndDate": 20231206, "roleEndReason": "REPLACED" }, { "customerRecordID": 24, "role": "TRDHOLDER", "roleStartDate": 20200907 }] }, { "fdidRecordID": 2, "firmDesignatedID": "IA1390", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20190604, "clearingBrokerID": ["1234"], "fdidCustomerList": [{</pre>

File	Data
	<pre> "customerRecordID": 5, "role": "TRDHOLDER", "roleStartDate": 20190604, "roleEndDate": 20231206, "roleEndReason": "REPLACED" }, { "customerRecordID": 6, "role": "TRDHOLDER", "roleStartDate": 20190604 }] }, "naturalPersonCustomerList": [{ "customerRecordID": 23, "customerType": ["FOREIGN"] }, { "customerRecordID": 24, "customerType": ["FOREIGN"] }, { "customerRecordID": 5, "customerType": ["FOREIGN"] }, { "customerRecordID": 6, "customerType": ["FOREIGN"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 23, "tidType": "FOREIGN", "foreignTIDType": "DRIVERLICENSE", "foreignTIDCountryCd": "CA", "tidValue": "fe68a21fc76bba7b3a3d8e454eca8cd258de68fd08dddf035f23ddbdce6fc049", "replacedByTIDType": "FOREIGN", "replacingForeignTIDType": "PASSPORT", "replacingForeignTIDCountryCd": "CA", "replacedByTID": "eccfd9d35d5b8aba4622278355e216200f09e782ac766c21b56415259f1be5de" }, { "customerRecordID": 24, "tidType": "FOREIGN", "foreignTIDType": "PASSPORT", "foreignTIDCountryCd": "CA", "tidValue": "eccfd9d35d5b8aba4622278355e216200f09e782ac766c21b56415259f1be5de" }] } </pre>

File	Data
	<pre> }, { "customerRecordID": 5, "tidType": "FOREIGN", "foreignTIDType": "DRIVERLICENSE", "foreignTIDCountryCd": "CA", "tidValue": "fe68a21fc76bba7b3a3d8e454eca8cd258de68fd08dddf035f23ddbdce6fc049", "replacedByTIDType": "FOREIGN", "replacingForeignTIDType": "PASSPORT", "replacingForeignTIDCountryCd": "CA", "replacedByTID": "eccfd9d35d5b8aba4622278355e216200f09e782ac766c21b56415259f1be5de" }, { "customerRecordID": 6, "tidType": "FOREIGN", "foreignTIDType": "PASSPORT", "foreignTIDCountryCd": "CA", "tidValue": "eccfd9d35d5b8aba4622278355e216200f09e782ac766c21b56415259f1be5de" }] }</pre>

3.4. Multiple Versions of a CAT Customer Within a Submission File

It is acceptable to report all FDID Records within a single submission in association with a single *customerRecordID* value so that the firm does not need to duplicate the data of the CAT Customer for each account. The CAT Customer's *role*, *roleStartDate*, *roleEndDate*, and *roleEndReason* do not need to be the same across each of the associated FDIDs. In this reporting structure, the single *customerRecordID* is associated to each FDID, however the CAT Customer data is present only once within the Reference Data file and the TIDs file. Alternatively, it is acceptable to report the same CAT Customer with multiple *customerRecordID* values, each with an association to one or more FDID Records. The data for the CAT Customer is repeated within the Reference Data file as well, once for each *customerRecordID*, and the same TID value is repeated within the TIDs file once for each *customerRecordID*.

3.4.1. Multiple Firm-Owned Accounts Demonstrating Customer Record Optionality

This scenario illustrates the CAT reporting requirements when an Industry Member is reporting multiple accounts that are owned by the firm, where the only CAT Customer on the accounts is the firm itself and the only parties authorized to trade in the accounts are employees of the Industry Member. The Industry Member is not required to report its employees as Authorized Traders on the accounts.

Option 1 – Same *customerRecordID*

It is acceptable to report all of the accounts in association with a single *customerRecordID* value within the *legalEntityCustomerList*, so that the firm does not need to duplicate the data of the CAT Customer for each account. The CAT Customer's *role*, *roleStartDate*, *roleEndDate*, and *roleEndReason* do not need to be the same across each of the associated FDIDs. In this reporting structure, the single *customerRecordID* is associated to each FDID, however the CAT Customer data is present only once within the Reference Data file and the TIDs file.

In this example, the Industry Member reports three FDIDs, each with an association to the single *customerRecordID* value.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A9574", "fdidType": "ACCOUNT", "accountType": ["FIRM"], "fdidDate": 20050821, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20050821 }] }, { "fdidRecordID": 2, "firmDesignatedID": "1A3016", "fdidType": "ACCOUNT", "accountType": ["FIRM", "MARKET"], "fdidDate": 20120301, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20120301 }] }, { "fdidRecordID": 3, "firmDesignatedID": "1A4496", "fdidType": "ACCOUNT", "accountType": ["FIRM"], "fdidDate": 20191201, "clearingBrokerID": ["1234"], "fdidCustomerList": [</pre>

File	Data
	<pre> { "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20191201 }] }, "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["BD"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "dc7232533673aa251694afab7091cf4e7ecb885fd80cefeff91df442dba855bb" }] } </pre>

Option 2 – Different *customerRecordIDs*

Option 2 is an alternative reporting approach to Option 1, above.

In Option 2, the same CAT Customer is reported with multiple *customerRecordID* values, one for each association to the FDID Record. The data for the CAT Customer is repeated within the Reference Data file as well, once for each *customerRecordID*, and the same TID value is repeated within the TIDs file once for each *customerRecordID*. The below example has three FDIDs with three different *customerRecordID* values.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A3175", "fdidType": "ACCOUNT", "accountType": ["FIRM"], "fdidDate": 20050821, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", </pre>

File	Data
	<pre> "roleStartDate": 20050821 }] }, { "fdidRecordID": 2, "firmDesignatedID": "1A0059", "fdidType": "ACCOUNT", "accountType": ["FIRM", "MARKET"], "fdidDate": 20120301, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 35, "role": "TRDHOLDER", "roleStartDate": 20120301 }] }, { "fdidRecordID": 3, "firmDesignatedID": "1A3102", "fdidType": "ACCOUNT", "accountType": ["FIRM"], "fdidDate": 20191201, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 50, "role": "TRDHOLDER", "roleStartDate": 20120301 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["BD"] }, { "customerRecordID": 35, "customerType": ["BD"] }, { "customerRecordID": 50, "customerType": ["BD"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", </pre>

File	Data
	<pre> "tidValue": "dc7232533673aa251694afab7091cf4e7ecb885fd80cefeff91df442dba855bb" }, { "customerRecordID": 35, "tidType": "EIN", "tidValue": "dc7232533673aa251694afab7091cf4e7ecb885fd80cefeff91df442dba855bb" }, { "customerRecordID": 50, "tidType": "EIN", "tidValue": "dc7232533673aa251694afab7091cf4e7ecb885fd80cefeff91df442dba855bb" }] }</pre>

3.4.2. Multiple Versions of Natural Person CAT Customer with Multiple Customer Records

In this example, the Industry Member is submitting two versions of a single Natural Person Customer, associated to three different FDIDs. The Industry Member is permitted to associate *customerRecordID* '1' to *fdidRecordID* '1' and *fdidRecordID* '2' because the *customerType* value in the Customer Record is the same ("NOTAPPLICABLE"). However, the Industry Member must create and report a different *customerRecordID* ('2', in this example) for *fdidRecordID* '3' because the account is owned by a trust, resulting in a different *customerType* value ("TRUST").

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A4041", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "branchOfficeCRD": 12345, "fdidDate": 20140624, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20140624 }] }, { "fdidRecordID": 2,</pre>

File	Data
	<pre> "firmDesignatedID": "1A8961", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "clearingBrokerID": ["1234"], "branchOfficeCRD": 12345, "fdidDate": 20160817, "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20160817 }] }, { "fdidRecordID": 3, "firmDesignatedID": "1B0987", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20160920, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20160920 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 2, "customerType": ["TRUST"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "360ae6aeb548ab78ffcb9032ac5213ec74d0017c229078fdca586b663d20d13e" }, { "customerRecordID": 2, "tidType": "SSN/ITIN", "tidValue": "360ae6aeb548ab78ffcb9032ac5213ec74d0017c229078fdca586b663d20d13e" }] } </pre>

File	Data
	<pre>] }</pre>

3.4.3. Repairing a Customer Record Rejection Due to Another Version of the CAT Customer Being Rejected

This scenario illustrates the CAT reporting requirements when multiple versions of a single CAT Customer are submitted within the same file, but one version is rejected. In that scenario, all versions of the CAT Customer within the file, as reconciled to a single *tidValue*, will reject.

In this example, the *customerType* field is not present or populated for *customerRecordID* '1'. Because *customerType* is a required field for all CAT Customers, this version of the CAT Customer is rejected with Error Code 22524 (Missing or Invalid *customerType*). In addition, all other versions of the CAT Customer (regardless of FDID associations) within the same file will be rejected with Error Code 22529 (Customer Record rejected because another version of the CAT Customer was rejected). All FDID Records associated to the rejected Customer Records will reject with Error Code 22048 (Associated Customer Record rejected). Resolving the original Customer Record rejection for Error Code 2252430 (Missing or Invalid *customerType*) will resolve all other related rejections, such as the rejections for Error Code 22529 and Error Code 22048.

It is permissible for the Industry Member to populate the *customerType* field with different values for different versions of the same CAT Customer.

Original Submission with Error

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A5971", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20070802, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20070802 }] }, { "fdidRecordID": 2, "firmDesignatedID": "1A5970",</pre>

File	Data
	<pre> "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20140920, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20140920 }] }, { "fdidRecordID": 3, "firmDesignatedID": "IA3087", "fdidType": "ACCOUNT", "accountType": ["DVP/RVP"], "DVPCustodianID": ["8888"], "fdidDate": 20110106, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 3, "role": "TRDHOLDER", "roleStartDate": 20110106 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 2, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 3, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDS	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "7f6c1986eb60d1ee313c2055674e4d6c79f2ce78a2ae9f8f83a89b12ac459ff3" }, { "customerRecordID": 2, "tidType": "EIN", </pre>

File	Data
	<pre> "tidValue": "7f6c1986eb60d1ee313c2055674e4d6c79f2ce78a2ae9f8f83a89b12ac459ff3" }, { "customerRecordID": 3, "tidType": "EIN", "tidValue": "7f6c1986eb60d1ee313c2055674e4d6c79f2ce78a2ae9f8f83a89b12ac459ff3" }] }</pre>

Repairing Submission

In this submission, the firm repairs the Customer Record rejection by adding a valid *customerType* field for *customerRecordID* '1'. Because the repairing submission includes the original FDID that received the 22048 Error Code, this resubmission results in the resolution of the FDID rejection (Error Code 22048) and the rejection of all other versions of the CAT Customer (Error Code 22529).

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A5971", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20070802, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20070802 }] }, { "fdidRecordID": 2, "firmDesignatedID": "1A5970", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20140920, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20140920 }] }] }</pre>

File	Data
	<pre> }, { "fdidRecordID": 3, "firmDesignatedID": "IA3087", "fdidType": "ACCOUNT", "accountType": ["DVP/RVP"], "DVPCustodianID": ["8888"], "fdidDate": 20110106, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 3, "role": "TRDHOLDER", "roleStartDate": 20110106 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 2, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 3, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "7f6c1986eb60d1ee313c2055674e4d6c79f2ce78a2ae9f8f83a89b12ac459ff3" }, { "customerRecordID": 2, "tidType": "EIN", "tidValue": "7f6c1986eb60d1ee313c2055674e4d6c79f2ce78a2ae9f8f83a89b12ac459ff3" }, { "customerRecordID": 3, "tidType": "EIN", "tidValue": "7f6c1986eb60d1ee313c2055674e4d6c79f2ce78a2ae9f8f83a89b12ac459ff3" }] } </pre>

3.4.4. Repairing a Customer Record Rejection Due to the FDID being Rejected

This scenario illustrates the CAT reporting requirements when a Customer Record is rejected because the FDID(s) it was associated to rejected.

In this example, the FDID Record is rejected because a required field, *fdidDate*, is not present or populated. This results in a rejection with Error Code 22007 (Missing or Invalid format of *fdidDate*). The associated Customer Record is also rejected because the FDID Record was rejected. This results in Error Code 22523 (Customer Record rejected because an associated FDID was rejected). Resolving the FDID Record rejection will resolve the rejection for Error Code 22523.

Original Submission with Error

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA1118", "accountType": ["OTHER"], "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20120520 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "78668117ae015072dd194c0bca1fb0a919cfe1b29c8bc963e497354a706a8e1e" }] }</pre>

Repairing Submission

In this submission, the firm repairs the FDID Record rejection by submitting a properly formatted *fdidDate* for *fdidRecordID* '1'. Because the repairing submission includes the original CAT Customer that received the 22523 Error Code, this resubmission results in the resolution of the FDID rejection (Error Code 22007) and the CAT Customer rejection (Error Code 22523).

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA1118", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20120520, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20120520 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "78668117ae015072dd194c0bca1fb0a919cfe1b29c8bc963e497354a706a8e1e" }] }</pre>

4. Customer and Account Reference Data Reporting Scenarios

This section illustrates the combined CAT Customer and account reference data reporting requirements for common CAT Customer and account scenarios. Each scenario will include a brief description and examples of the data for inclusion in the Reference Data File and Transformed Identifiers (TIDs) File. Refer to Section 4 of the [Reference Database Technical Specifications](#) for additional information.

4.1. Firm Owned Accounts

4.1.1. Firm-Owned Account with only Employees Authorized to Trade

This scenario illustrates the CAT reporting requirements when an Industry Member is reporting a firm-owned account, where the only CAT Customer on the account is the firm itself and the only parties authorized to trade in the account are employees of the Industry Member. The Industry Member is reported with a *role* of 'TRDHOLDER', as it is the beneficial holder of the account and is authorized to trade on the account, and the Industry Member is not required to report its employees as Authorized Traders on the account.

In this example, the *customerType* is populated with 'BD', since the Industry Member is a U.S. registered broker-dealer.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A4085", "fdidType": "ACCOUNT", "accountType": ["FIRM"], "fdidDate": 20050821, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20050821 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["BD"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{</pre>

File	Data
	<pre> "customerRecordID": 1, "tidType": "EIN", "tidValue": "8caf6f28a2e293d5a12b107afe11fee79a1a20d72c6b297290282a2a7f9f44bb" }] }</pre>

4.1.2. Firm-Owned Average Price Account Used for Multiple CAT Customers

This scenario illustrates the CAT reporting requirements when the account reported to the Reference Database represents a firm-owned average price account used for multiple CAT Customers, where the only CAT Customer on the account is the firm itself and the only parties authorized to trade in the account are employees of the Industry Member. The Industry Member is not required to report its employees as Authorized Traders on the account.

Since this is a firm-owned average price account, the *accountType* must include 'AVERAGE'. The Industry Member is reported with a *role* of 'TRDHOLDER', as it is the beneficial holder of the account and is authorized to trade on the account.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 224, "firmDesignatedID": "1A4845", "fdidType": "ACCOUNT", "accountType": ["AVERAGE", "FIRM"], "fdidDate": 20210115, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 23, "role": "TRDHOLDER", "roleStartDate": 20210115 }] }], "legalEntityCustomerList": [{ "customerRecordID": 23, "customerType": ["BD"] }] }</pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 23, "tidType": "EIN",</pre>

File	Data
	<pre> "tidValue": "cc1a0c104324aeb0159fc79195977d19794d594036d893f23a6ec23e6b4fe930" }] }</pre>

4.2. CAT Customer Accounts

This section illustrates the CAT reporting requirements when the account reported to CAT is not owned by the reporting Industry Member.

4.2.1. Account with Only One Holder

This scenario illustrates the CAT reporting requirements for an account on which there is a single trading CAT Customer.

In this example, the account is a retirement account established by the account holder who also has authorization to trade on the Account and is reported with a *role* of 'TRDHOLDER'. The *accountType* must include 'RETIREMENT'.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 2000, "firmDesignatedID": "1A25978", "fdidType": "ACCOUNT", "accountType": ["RETIREMENT"], "fdidDate": 20210115, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 40, "role": "TRDHOLDER", "roleStartDate": 20210115 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 40, "customerType": ["NOTAPPLICABLE"] }] }</pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 40, "tidType": "SSN/ITIN", </pre>

File	Data
	<pre> "tidValue": "7d428d1e6f7ddf14973c2c0df79ccc87912322c68ca500f29b27cf5bee487ed5" }] }</pre>

4.2.2. Account Holder and Industry Member as Authorized Trader

This scenario illustrates the CAT reporting requirements when the account reported to the Reference Database has two CAT Customers: an account holder and an Authorized Trader who is not a holder of the Account.

In this example, the Industry Member is an Authorized Trader on the account who has authority to place orders for the Account without prior approval of the account holder. Both the account holder and the Authorized Trader Industry Member must be reported as CAT Customers on the FDID Record.

In this example, the Industry Member itself is the Authorized Trader and the account holder has not specifically designated any natural person employees of the Industry Member as authorized to trade for the account independent of the authority granted to the entity authorized trader. Refer to [FAQ X11](#) for additional information. In this example, the Industry Member must be identified in a *role* of 'AUTHREP' and *hasDiscretion* must be 'true'. In addition, *customerType* must include 'BD'.

For contrast, see [Scenario 4.2.3: Account with Specifically Designated Industry Member Employee Broker as Authorized Trader](#).

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 5000, "firmDesignatedID": "1A25978", "fdidType": "ACCOUNT", "accountType": ["RETIREMENT"], "registeredRepCRD": [99999], "branchOfficeCRD": 77777, "fdidDate": 20210115, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 72, "role": "TRDHOLDER", "roleStartDate": 20210115 }, { "customerRecordID": 589, "role": "AUTHREP", "hasDiscretion": true, </pre>

File	Data
	<pre> "roleStartDate": 20210115 }] }, "naturalPersonCustomerList": [{ "customerRecordID": 72, "customerType": ["NOTAPPLICABLE"] }], "legalEntityCustomerList": [{ "customerRecordID": 589, "customerType": ["BD", "ADVISER"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 72, "tidType": "SSN/ITIN", "tidValue": "47471430482258447580bb291a2ba29c79483f09000f25fcccfdc3bead7f46e0" }, { "customerRecordID": 589, "tidType": "EIN", "tidValue": "c30ef117db387710cdd88ebca6887a7d2356ee40e0df29e04cc3ba6ae2facf92" }] } </pre>

4.2.3. Account with Specifically Designated Industry Member Employee Broker as Authorized Trader

This scenario illustrates the CAT reporting requirements when an employee of the Industry Member is an Authorized Trader who is not a holder of the Account but does have authority to place orders for the Account without prior approval of the account holder(s) and the account holder specifically designated the natural person employee as authorized to trade for the account independent of the authority granted to the entity authorized trader. See [FAQ X11](#) for more information.

In this example, the account holder specifically designated a natural person employee of the Industry Member, as authorized to trade for the account independent of any authority that may be granted to the Industry Member entity itself. The Industry Member must identify the natural person employee as a CAT Customer in the *role* of 'AUTHREP' with a *customerType* of 'EMPLOYEE'.

Since the Industry Member itself is *not* an authorized trader on the account, the Industry Member is not a CAT Customer for this account. For contrast, see [Scenario 4.2.2: Account Holder and Industry Member as Authorized Trader](#).

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 2000, "firmDesignatedID": "1A0973", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20050926, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 40, "role": "TRDHOLDER", "roleStartDate": 20050926 }, { "customerRecordID": 41, "role": "AUTHREP", "hasDiscretion": true, "roleStartDate": 20050926 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 40, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 41, "customerType": ["EMPLOYEE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 40, "tidType": "SSN/ITIN", "tidValue": "6a36505e1b5bfb49dc7f2d3c978d83e03945e7bc8e82b9d6d5a2334d18a164b4" }, { "customerRecordID": 41, "tidType": "SSN/ITIN", "tidValue": "d1e57d9fdea716fbd204515d547f9c71216ee614c16838436dd25429c4b9a555" }] } </pre>

File	Data
	}

4.2.4. DVP/RVP Accounts with Prime Broker or Bank Custodian

This scenario illustrates a clearing firm's CAT reporting requirements when the account reported to the Reference Database is a DVP/RVP account, where the shares are being delivered from the clearing firm to either a prime broker or a bank custodian.

For DVP/RVP accounts, the *accountType* must be set to 'DVP/RVP' and the *DVPCustodianID* field must be populated with either the clearing number of a prime broker or the DTC number of a bank custodian, depending on the custodial arrangement.

Example 1: DVP/RVP Account with Prime Broker Custodian

In this example, the *DVPCustodianID* field must be populated with the clearing number of the prime broker.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 123, "firmDesignatedID": "1A1938", "fdidType": "ACCOUNT", "accountType": ["DVP/RVP"], "branchOfficeCRD": 123456, "DVPCustodianID": ["9542"], "clearingBrokerID": ["1028"], "fdidDate": 20210115, "fdidCustomerList": [{ "customerRecordID": 1, "role": "NTHOLDER", "roleStartDate": 20210115 }, { "customerRecordID": 55, "role": "AUTH3RD", "hasDiscretion": true, "roleStartDate": 20210115 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["BD"] }, { "customerRecordID": 55,</pre>

File	Data
	<pre> "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDS	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "e08c15f826ee2a9baacf4d390d495e77a21babd1ab964cc6f8271e9925267c61" }, { "customerRecordID": 55, "tidType": "EIN", "tidValue": "d2afa960e7fb1bdd523a225f994bb8c1f9b31f4ac17f6271cdf9b3b016e7a6b6" }] } </pre>

Example 2: DVP/RVP Account with Bank Custodian

In this example, the *DVPCustodianID* field must be populated with the DTC number of the bank.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 123, "firmDesignatedID": "1A0491", "fdidType": "ACCOUNT", "accountType": ["DVP/RVP"], "branchOfficeCRD": 654321, "DVPCustodianID": ["3209"], "clearingBrokerID": ["1022"], "fdidDate": 20210115, "fdidCustomerList": [{ "customerRecordID": 55, "role": "TRDHOLDER", "roleStartDate": 20210115 }] }], "legalEntityCustomerList": [{ "customerRecordID": 55, "customerType": ["NOTAPPLICABLE"] }] } </pre>

File	Data
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 55, "tidType": "EIN", "tidValue": "fbbf9e01933589e830d93613149976c587a6ceddbd10a28614cb1f4b83e1b84e" }] }</pre>

4.2.5. UGMA/UTMA Custodied Account

This scenario illustrates the CAT reporting requirements for an UGMA/UTMA custody account with two CAT Customers- one who is the custodian, and another who is a minor and does not have authorization to trade.

In recognition of the variety of account structures, CAT Customer roles and business practices, etc., the Reference Database system is flexible and can handle a number of reporting structures and business processes. The below illustrations do not depict all possible Reference Database reporting scenarios and is not intended to suggest that these are the only ways Industry Members can report UGMA/UTMA custody accounts to the Reference Database. It is important to note that Industry Members must adhere to the reporting requirements as set forth in the [Reference Database Technical Specifications](#).

Illustrated below are two options for the account structure, and four options for reporting when the minor reaches the age of majority. The *accountType* must include 'UGMA/UTMA' to identify these custodial accounts.

Account Structure – Option 1

In this example, the Industry Member establishes the account with the custodian as an account holder with authorization to trade on the account, and the minor as a holder of the account that does not have authorization to trade.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 2000, "firmDesignatedID": "1A25978", "fdidType": "ACCOUNT", "accountType": ["UGMA/UTMA"], "fdidDate": 20210115, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 40, "role": "TRDHOLDER", </pre>

File	Data
	<pre> "roleStartDate": 20210115 }, { "customerRecordID": 10, "role": "NTHOLDER", "roleStartDate": 20210115 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 40, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 10, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 40, "tidType": "SSN/ITIN", "tidValue": "a82f70c87b9c3371825ed68ee61c35cf856a9cce50a71676be3533963e5f8719" }, { "customerRecordID": 10, "tidType": "SSN/ITIN", "tidValue": "18d55bf55668ecd5922288be01548d3f0bd9fa338db1dc43165ac3d560c43c44" }] } </pre>

Account Structure – Option 2

In this example, the custodian is an authorized trader who is not a holder of the Account, and the minor is a holder of the account that does not have authorization to trade.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 2000, "firmDesignatedID": "1A25978", "fdidType": "ACCOUNT", "accountType": ["UGMA/UTMA"], "fdidDate": 20210115, </pre>

File	Data
	<pre> "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 40, "role": "AUTH3RD", "hasDiscretion": true, "roleStartDate": 20210115 }, { "customerRecordID": 10, "role": "NTHOLDER", "roleStartDate": 20210115 }] },], "naturalPersonCustomerList": [{ "customerRecordID": 40, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 10, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 40, "tidType": "SSN/ITIN", "tidValue": "a82f70c87b9c3371825ed68ee61c35cf856a9cce50a71676be3533963e5f8719" }, { "customerRecordID": 10, "tidType": "SSN/ITIN", "tidValue": "18d55bf55668ecd5922288be01548d3f0bd9fa338db1dc43165ac3d560c43c44" }] } </pre>

Age of Majority – Option 1 & Option 2: Closing Old Account and Opening New Account

When a minor reaches the age of majority, the Industry Member's policy is to close the UGMA/UTMA account and transfer the assets to a new brokerage account.

The minor has reached the age of majority and contacted the Industry Member.

Option 1 – New Account Without Former Custodian

In Option 1, the former minor is the account holder that also has authorization to trade on the new account and the former custodian is not a CAT Customer on the new account. The Industry Member ends the FDID when the UGMA/UTMA is closed and creates a new FDID based on the new account in the same file submission. In addition, the Industry Member implicitly ends the *roles* on the closed FDID by omitting them from the submission.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A25978", "fdidType": "ACCOUNT", "accountType": ["UGMA/UTMA"], "fdidDate": 20210115, "clearingBrokerID": ["1234"], "fdidEndDate": 20220815, "fdidEndReason": "ENDED" }, { "fdidRecordID": 2, "firmDesignatedID": "IA94913", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20220815, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20220815 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "18d55bf55668ecd5922288be01548d3f0bd9fa338db1dc43165ac3d560c43c44" }] }</pre>

Option 2 – New Account with Former Custodian as Authorized Trader

In Option 2, the former minor is the account holder that also has authorization to trade on the new account and the former custodian is an authorized trader on the new account. The Industry Member ends the FDID when the UGMA/UTMA is closed and creates a new FDID based on the new account in the same file submission. In addition, the Industry Member implicitly ends the *roles* on the closed FDID by omitting them from the submission.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A25978", "fdidType": "ACCOUNT", "accountType": ["UGMA/UTMA"], "fdidDate": 20210115, "clearingBrokerID": ["1234"], "fdidEndDate": 20220815, "fdidEndReason": "ENDED" }, { "fdidRecordID": 2, "firmDesignatedID": "IA94913", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20220815, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 10, "role": "TRDHOLDER", "roleStartDate": 20220815 }, { "customerRecordID": 40, "role": "AUTH3RD", "hasDiscretion": true, "roleStartDate": 20220815 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 40, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 10, "customerType": ["NOTAPPLICABLE"] }] }</pre>

File	Data
TIDS	<pre>{ "tidRecordList": [{ "customerRecordID": 40, "tidType": "SSN/ITIN", "tidValue": "18d55bf55668ecd5922288be01548d3f0bd9fa338db1dc43165ac3d560c43c44" }, { "customerRecordID": 10, "tidType": "SSN/ITIN", "tidValue": "57af67a635570b66ec7385cb6e9bd2c8b4ee311063f189c6a1bfb7c313e700b8" }] }</pre>

Age of Majority – Option 3 and Option 4

In Option 3 and Option 4, the Industry Member's business practice is to repurpose the same account when the minor reaches the age of majority. The Industry Member must update the *accountType* field by removing 'UGMA/UTMA' and populate this field with all applicable allowable values. Also in Option 3 and Option 4, the former custodian is no longer a CAT Customer associated to this FDID.

Option 3 – Explicitly Ending One CAT Customer's *role* and Implicitly Ending the Other CAT Customer's *role*

In Option 3, the Industry Member explicitly ends the former custodian's *role* by setting a *roleEndDate* and *roleEndReason*. The Industry Member also creates a new *role* for the former minor of 'TRDHOLDER'. Omitting the former minor's previous *role* of 'NTHOLDER' implicitly ends the previous *role* in the Reference Database.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 2000, "firmDesignatedID": "1A25978", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20210115, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 40, "role": "TRDHOLDER", "roleStartDate": 20210115, "roleEndDate": 20210815, "roleEndReason": "ENDED" }] }] }</pre>

File	Data
	<pre> }, { "customerRecordID": 10, "role": "TRDHOLDER", "roleStartDate": 20210815 }] },], "naturalPersonCustomerList": [{ "customerRecordID": 40, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 10, "customerType": ["NOTAPPLICABLE"] }] } } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 40, "tidType": "SSN/ITIN", "tidValue": "a82f70c87b9c3371825ed68ee61c35cf856a9cce50a71676be3533963e5f8719" }, { "customerRecordID": 10, "tidType": "SSN/ITIN", "tidValue": "18d55bf55668ecd5922288be01548d3f0bd9fa338db1dc43165ac3d560c43c44" }] } </pre>

Option 4 – Implicitly Ending Both CAT Customer's *roles*

In Option 4, the Industry Member implicitly ends the former custodian's *role* by omitting it from the updating submission. The Industry Member also creates a new *role* for the former minor of 'TRDHOLDER'. Omitting the former minor's previous *role* of 'NTHOLDER' implicitly ends the previous *role* in the Reference Database.

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 2000, "firmDesignatedID": "1A25978", "fdidType": "ACCOUNT", </pre>

File	Data
	<pre> "accountType": ["OTHER"], "fdidDate": 20210115, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 10, "role": "TRDHOLDER", "roleStartDate": 20210815 }], "naturalPersonCustomerList": [{ "customerRecordID": 10, "customerType": ["NOTAPPLICABLE"] }] </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 10, "tidType": "SSN/ITIN", "tidValue": "18d55bf55668ecd5922288be01548d3f0bd9fa338db1dc43165ac3d560c43c44" }] } </pre>

4.2.6. Adding Holders or Authorized Traders to an Account

This scenario illustrates the CAT reporting requirements for adding another CAT Customer to an FDID. Depending on the Industry Member's business practices, it can either add additional holders or authorized traders to the same account, or the firm can close the account and open a new account.

Option 1 – Adding a New CAT Customer to the Same Account

In Option 1, the FDID Record was previously accepted by the Reference Database with a single natural person Customer Record. The Industry Member is adding another natural person as a CAT Customer to the same account, so the Industry Member must submit an FDID Record with all the same information that was previously accepted by the Reference Database, plus the second Customer Record with a new *roleStartDate* reflecting when the second CAT Customer was added. In addition, the TIDs file now includes the TID information for the newly added CAT Customer.

Updating Submission

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A7759", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20190615, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20190615 }, { "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20220815 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 2, "customerType": ["NOTAPPLICABLE"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "56c4d1ee2fa66991602dc80580116d195ca362d7a0b5647fea17f3e104c97944" }, { "customerRecordID": 2, "tidType": "SSN/ITIN", "tidValue": "76d983df81f129e1d917709aead1cfe9f7be02057d053d2187b12961b55d0f8c" }] }</pre>

Option 2 – Ending an Individual Account and Opening a New Joint Account

In Option 2, the Industry Member has closed an individual account and opened a new account with two account holders.

In Option 2, the Industry Member reports the updated status of the closed individual account and the newly opened account within the same submission file. The Industry Member must include an *fdidEndDate* and *fdidEndReason* of 'ENDED' for the closed account. In addition, the Industry Member implicitly ends the *role* on the closed FDID by omitting it from the submission.

Submission Includes an Update to an FDID Record and an Original Submission of an FDID Record

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A7759", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20190615, "clearingBrokerID": ["1234"], "fdidEndDate": 20220815, "fdidEndReason": "ENDED" }, { "fdidRecordID": 2, "firmDesignatedID": "1A7760", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20220815, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20220815 }, { "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20220815 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 2, "customerType": ["NOTAPPLICABLE"] }] }</pre>

File	Data
	<pre> }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "56c4d1ee2fa66991602dc80580116d195ca362d7a0b5647fea17f3e104c97944" }, { "customerRecordID": 2, "tidType": "SSN/ITIN", "tidValue": "76d983df81f129e1d917709aead1cfe9f7be02057d053d2187b12961b55d0f8c" }] } </pre>

4.3. Nullifying FDID and Customer Record Field Values

This section illustrates the CAT reporting requirements when an Industry Member has previously submitted an FDID or Customer Record to the Reference Database and the record was accepted, but later needs to nullify one or more field values of the FDID or Customer Record. Since each FDID submission to the Reference Database requires full FDID data, including CAT Customer associations, omitting a Conditional or Optional field will nullify the field value in the Reference Database. Additionally, including the field but populating it with 'null' will nullify it in the Reference Database.

4.3.1. Nullifying Field Values via Omission

This scenario illustrates the CAT reporting requirements when an Industry Member has previously submitted FDID and Customer Records with the *fdidEndDate*, *fdidEndReason*, *roleEndDate*, and *roleEndReason* fields populated. The Industry Member determines the FDID was ended in error, and it needs to be active in the Reference Database.

In this example, the Industry Member resubmits the FDID and Customer Records with the *fdidEndDate*, *fdidEndReason*, *roleEndDate*, and *roleEndReason* fields omitted which will clear out the end dates and end reasons in the Reference Database.

Ending Submission with End Dates and End Reasons Populated

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 2000, </pre>

File	Data
	<pre> "firmDesignatedID": "1A3382", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20160502, "clearingBrokerID": ["1234"], "fdidEndDate": 20220712, "fdidEndReason": "ENDED", "fdidCustomerList": [{ "customerRecordID": 40, "role": "TRDHOLDER", "roleStartDate": 20160502, "roleEndDate": 20220712, "roleEndReason": "ENDED" }] }, "naturalPersonCustomerList": [{ "customerRecordID": 40, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDS	<pre> { "tidRecordList": [{ "customerRecordID": 40, "tidType": "SSN/ITIN", "tidValue": "5c9be19543351f345072b444db12964309366da9c5fc4a8348745da590477677" }] } </pre>

Nullifying Submission (Omitting End Dates and End Reasons)

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 2000, "firmDesignatedID": "1A3382", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20160502, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 40, "role": "TRDHOLDER", "roleStartDate": 20160502 </pre>

File	Data
	<pre> }] }], "naturalPersonCustomerList": [{ "customerRecordID": 40, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 40, "tidType": "SSN/ITIN", "tidValue": "5c9be19543351f345072b444db12964309366da9c5fc4a8348745da590477677" }] } </pre>

4.3.2. Nullifying Field Values Using 'null' Value

This scenario illustrates the CAT reporting requirements when an Industry Member has previously submitted FDID and Customer Records with the *fdidEndDate*, *fdidEndReason*, *roleEndDate*, and *roleEndReason* fields populated. The Industry Member determines the FDID was ended in error, and it needs to be active in the Reference Database.

In this example, the Industry Member resubmits the FDID and Customer Records with the *fdidEndDate*, *fdidEndReason*, *roleEndDate*, and *roleEndReason* fields having a value of 'null' which will clear out the end dates and end reasons. The Industry Member must only populate the *fdidEndDate*, *fdidEndReason*, *roleEndDate*, and *roleEndReason* with a lowercase value of 'null' (without quotes). Including a value of 'NULL' (uppercase without quotes) will result in a file integrity error as 'NULL' is invalid JSON.

Ending Submission with End Dates and End Reasons Populated

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 2000, "firmDesignatedID": "1A3382", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20160502, "registeredRepCRD": [999999], "clearingBrokerID": ["1234"], "fdidEndDate": 20220712, </pre>

File	Data
	<pre> "fdidEndReason": "ENDED", "fdidCustomerList": [{ "customerRecordID": 40, "role": "TRDHOLDER", "roleStartDate": 20160502, "roleEndDate": 20220712, "roleEndReason": "ENDED" }], "naturalPersonCustomerList": [{ "customerRecordID": 40, "customerType": ["NOTAPPLICABLE"] }] </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 40, "tidType": "SSN/ITIN", "tidValue": "5c9be19543351f345072b444db12964309366da9c5fc4a8348745da590477677" }] } </pre>

Nullifying Submission (with 'null' Values)

File	Data
Data	<pre> { "fdidRecordList": [{ "fdidRecordID": 2000, "firmDesignatedID": "1A3382", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20160502, "registeredRepCRD": [999999], "clearingBrokerID": ["1234"], "fdidEndDate": null, "fdidEndReason": null, "fdidCustomerList": [{ "customerRecordID": 40, "role": "TRDHOLDER", "roleStartDate": 20160502, "roleEndDate": null, "roleEndReason": null }] }] } </pre>

File	Data
	<pre>] }], "naturalPersonCustomerList": [{ "customerRecordID": 40, "customerType": ["NOTAPPLICABLE"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 40, "tidType": "SSN/ITIN", "tidValue": "5c9be19543351f345072b444db12964309366da9c5fc4a8348745da590477677" }] } </pre>

4.4. Correcting an Erroneous TID Value

4.4.1. Correcting an Erroneous TID Value

This scenario illustrates the CAT reporting requirements when an Industry Member has submitted a Customer Record to the Reference Database which passed data validation checks, but the Industry Member later determines that the Input Identifier used to generate the *tidValue* was erroneously entered. For contrast, see [Scenario 5.1.2: Correcting a Malformed TID Error](#) where the Input Identifier did not pass data validation checks due to an invalid format.

In this example, the Industry Member initially used an EIN value of '00-0698421' for the TID; however, it later determined that the correct EIN value for the customer was '00-0698422'.

For the Customer Record generated from the erroneous TID value, the Industry Member must resubmit the Customer Record with a *roleEndDate* populated with the same date as the *roleStartDate* to indicate that the Customer Record should never have been associated to the FDID. In addition, the Industry Member must populate a *roleEndReason* of 'CORRECTION' for the erroneous Customer Record. It is not permissible to implicitly end this Customer's record by omitting it from the resubmission.

In this example, the CAT Customer's *role* did not change when the Input Identifier was corrected, so, for the Customer Record generated from the correct TID value, the *roleStartDate* must be the original date the CAT Customer entered into the *role* of 'TRDHOLDER'. In the Transformed Identifiers File, the Industry Member must populate the CAT Customer's correct TID value.

It is not permissible to use the *replacedByTID* functionality in scenarios where the TID was submitted to the Reference Database as an erroneous value.

The updated *tidValue* for the CAT Customer must be propagated across all FDID associations at the Industry Member.

Original Submission with Erroneous TID Value

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA7026", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20220102, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20220102 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "cb85ea9881aa9dc3b999ba9c1720a009274d12e3dad929151014cbf2d189af22" }] }</pre>

Correcting Submission

In the correcting submission, the Industry Member must include two Customer Records: (1) a record for the CAT Customer associated with the *tidValue* generated from the incorrect Input Identifier value, with a *roleEndReason* of 'CORRECTION' and a *roleEndDate* populated with the same date as the *roleStartDate* to indicate that the Customer Record should not have been associated to the FDID; and (2) a new record

for the CAT Customer associated with the *tidValue* generated from the correct Input Identifier value, with a *roleStartDate* reflecting the date the CAT Customer originally entered into the specified *role* and not the date that the new *tidValue* was generated based on the correct Input Identifier. In addition, there must be two corresponding entries in the Transformed Identifiers File.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA7026", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20220102, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20220102, "roleEndDate": 20220102, "roleEndReason": "CORRECTION" }, { "customerRecordID": 2, "role": "TRDHOLDER", "roleStartDate": 20220102 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }, { "customerRecordID": 2, "customerType": ["NOTAPPLICABLE"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "cb85ea9881aa9dc3b999ba9c1720a009274d12e3dad929151014cbf2d189af22" }, { "customerRecordID": 2, "tidType": "EIN", "tidValue": </pre>

File	Data
	"db0b3bbfde73b1662acd3dfbb180ad65d76863417c15bb2b375ee77a98f760bd" }] }

5. Correction List

This section illustrates the CAT reporting requirements for use of the *correctionList*. The *correctionList* is a feature of the Reference Data File available to support repair of Data Validation Errors through the submission of one or more Correction Action Records.

All Data Validation Errors (Error Codes 22001 through 23999) may be repaired by submitting a *correctionAction* of 'DELETE'.

When a malformed FDID or CAT Customer was submitted to the Reference Database, it must be repaired by submitting a *correctionAction* of 'CORRECTION' or 'DELETE'. Records failing Data Validation for the following reasons require use of the *correctionList* within the Reference Data File:

1. Missing or Invalid *firmDesignatedID* (Error Code 22001)
2. Malformed TID Record (Error Code 22900)
3. *customerRecordID* not present in paired Transformed Identifiers File (Error Code 22526)
4. Missing or Invalid *customerRecordID* in paired Data File (Error Code 22501)
5. Paired TID record failed validation (Error Code 22914)

5.1.1. Repairing a Malformed FDID Rejection

This scenario illustrates the CAT reporting requirements when a malformed FDID is submitted to the Reference Database resulting in a rejection. The Industry Member must either delete the rejection or repair it. A *correctionAction* of 'DELETE' does not delete the FDID or Customer Record from the Reference Database; it deletes the rejection. Any FDID Records or Customer Records that are required to be reported to the Reference Database but were submitted with a *correctionAction* of 'DELETE' must be accepted in its full current state by the Reference Database in a prior or subsequent submission.

Option 1 – Deleting a Malformed FDID Rejection

In this example, the Industry Member's original submission included the '@' sign in the *firmDesignatedID* field, which is not an allowable value for a Text Data Type. This results in a rejection with Error Code 22001 (Missing or Invalid *firmDesignatedID*) and a *rejectionID* of '999999' in its feedback file. Also in this example, since this is the only FDID that the CAT Customer is associated with in this specific submission file, the Industry Member will receive Error Code 22523 (Customer Record rejected because an associated FDID was rejected) and a *rejectionID* of '555555' in its feedback file. The Industry Member determines the submission was erroneous and should not have been submitted to the Reference Database, and deletes the rejections using correction actions of 'DELETE' for each *rejectionID*.

In this example, the Industry Member must include in the *correctionList* the *rejectionID* value of '999999' and a *correctionAction* of 'DELETE' as well as the *rejectionID* value of '555555' and a *correctionAction* of 'DELETE'.

Submission with Error

In the original submission, the '@' sign was erroneously included in the *firmDesignatedID* field.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1@345678910", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20160721, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20160721 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "568ca6d8af479889d124c329061ea0762a9c87abc3c80fddb659804477531e1a" }] }</pre>

Repairing Submission by Deleting the Rejection

The repairing submission includes both *rejectionIDs* in the *correctionList* with *correctionAction* of 'DELETE'.

In this example, main-level JSON objects are included for clarity.

File	Data
Data	<pre>{ "version": "1.0.0", "catReporterCRD": 12345, "catSubmitterID": 12345, "fdidRecordCount": 0, "naturalPersonCustomerRecordCount": 0, "legalEntityCustomerRecordCount": 0, "correctionList": [{ "rejectionID": 999999, "correctionAction": "DELETE" }, { "rejectionID": 555555, "correctionAction": "DELETE" }] }</pre>
TIDs	<pre>{ "version": "1.0.0", "tidRecordCount": 0 }</pre>

Option 2 - Deleting a Malformed FDID Rejection

In this example, the Industry Member's original submission included the '@' sign in the *firmDesignatedID* field, which is not an allowable value for a Text Data Type. This results in a rejection with Error Code 22001 (Missing or Invalid *firmDesignatedID*) and a *rejectionID* of '12345' in its feedback file. Also in this example, since this is the only FDID that the CAT Customer is associated to in this specific submission file, the Industry Member will receive Error Code 22523 (Customer Record rejected because an associated FDID was rejected) and a *rejectionID* of '98765' in its feedback file. The Industry Member determines the FDID was reported to the Reference Database with an incorrect *firmDesignatedID* value of '1@34567', and wishes to repair the *firmDesignatedID* with a value of '1A34567' using a *correctionAction* of 'CORRECTION'.

Repairing Error Code 22001 (Missing or Invalid *firmDesignatedID*) requires use of the *correctionList*. In this example, the Industry Member must include the *rejectionID* value of '12345', a *correctionAction* of 'CORRECTION' and a *correctingFirmDesignatedID* value of '1A34567' in the *correctionList*. The *correctingFirmDesignatedID* value must reference a corresponding FDID that is either included in the current submission file or was accepted by the Reference Database in a prior submission file. A properly formatted submission with all required fields and the original CAT Customer that received the 22523 Error Code will repair both Error Codes 22001 and 22523.

Original Submission with Error

In the original submission, the '@' sign was erroneously included in the *firmDesignatedID* field.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1@34567", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20160721, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20160721 }] }], "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "568ca6d8af479889d124c329061ea0762a9c87abc3c80fddb659804477531e1a" }] }</pre>

Repairing Submission by Correcting the FDID Record

The repairing submission includes a *rejectionID* of '12345' in the *correctionList* with a pointer to the correcting FDID Record (*correctingFirmDesignatedID* value '1A34567'). It also includes the repairing FDID Record within the submission file (*firmDesignatedID* value of '1A34567').

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1A34567",</pre>

File	Data
	<pre> "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20160721, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20160721 }] }, "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }], "correctionList": [{ "rejectionID": 12345, "correctionAction": "CORRECTION", "correctingFirmDesignatedID": "1A34567" }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "568ca6d8af479889d124c329061ea0762a9c87abc3c80fddb659804477531e1a" }] } </pre>

5.1.2. Correcting a Malformed TID Error

This scenario illustrates the CAT reporting requirements when an Industry Member has submitted a malformed TID to the Reference Database and must repair the error.

In this example, the CAT Customer has an EIN of '00-1987445', however the Input Identifier used to generate the CAT Customer's TID contains an extra dash ('00--1987445'). This results in rejections with Warning Code 24907 (Malformed TID Record -Invalid Input Identifier used to generate *tidValue* for *tidType* of EIN); Error Code 22900 (Malformed TID Record – Customer Record not processed) and *rejectionID* of '12345'; and Error Code 22048 (Associated Customer Record rejected) and a *rejectionID* of '67890' in the Industry Member's feedback file. If the Industry Member wishes to repair *rejectionID* '12345'

using a *correctionAction* of 'CORRECTION' and includes the original FDID which received Error Code 22048 this will automatically resolve both Error Codes (22900 and 22048).

Repairing Error Code 22900 (Malformed TID Record – Customer Record not processed) requires use of the *correctionList*. In this example, the Industry Member must include the *rejectionID* value of '12345', a *correctionAction* of 'CORRECTION' and a *correctingCustomerRecordID* (referencing the *customerRecordID* included in the current submission file that is correcting the rejection).

Original Submission with Error

In the original submission, the *tidValue* in the Transformed Identifiers File was incorrectly hashed due to the Input Identifier containing an extra dash ('00--1987445').

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA0867", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20120520, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20120520 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "33c1420dffc371e105c0a469e3566c0ee9b45ddc26a93ae238b2a7db4c624828" }] }</pre>

Repairing Submission by Correcting the Customer Record

The firm creates a correcting submission that includes the correct Customer Record and corresponding TID, noting the *rejectionID* value of '12345', a *correctionAction* of 'CORRECTION' and a *correctingCustomerRecordID* (referencing the *customerRecordID* included in the current submission file that is correcting the rejection).

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "IA0867", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20120520, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20120520 }] }], "legalEntityCustomerList": [{ "customerRecordID": 1, "customerType": ["NOTAPPLICABLE"] }], "correctionList": [{ "rejectionID": 12345, "correctionAction": "CORRECTION", "correctingCustomerRecordID": 1 }] }</pre>
TIDs	<pre>{ "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "3fb5f53b2266b80eab62eeb791b7294577b22b73cf25d028d9284591753aa86f" }] }</pre>

5.1.3. Optionally Deleting a Rejection for a Data Validation Error on a Customer Record

This scenario illustrates the CAT reporting requirements when an Industry Member has erroneously reported a mismatch on the Customer Type (Natural Person or Legal Entity) and *tidType*. Similar guidance would apply when there is a mismatch on Customer Type (Natural Person or Legal Entity) and *foreignTIDType*.

In this example, the CAT Customer is a trust with an Input Identifier that is a Social Security Number (SSN). However, the Industry Member erroneously hashed the SSN as an Employer Identification Number (EIN)- formatted as '99-9999999'- and reported the CAT Customer in the *naturalPersonCustomerList*. This results in a rejection with Error Code 22542 (Natural Person CAT Customer reported with improper *tidType*) and a *rejectionID* '77799'. In order to repair this error code, the CAT Customer must be resubmitted in the *legalEntityCustomerList* with a *tidType* of 'EIN' and the same *tidValue*. However, since the hashed TID value represents a CAT Customer that is not actually associated to the FDID, the Industry Member opts to repair the rejection using a *correctionAction* of 'DELETE'.

Additionally, since one of the FDID's associated Customer Records was rejected, the FDID is also rejected with Error Code 22048 (Associated Customer Record rejected) and a *rejectionID* of '44433'. In this example, since the Industry Member is required to report its CAT Customer in association to this FDID, it resubmits the FDID Record in its current state with all required CAT Customer associations which repairs *rejectionID* '44433'.

Original Submission with Error

In the original submission, the CAT Customer is correctly reported in the *naturalPersonCustomerList* in the Reference Data File but erroneously reported with a *tidType* of 'EIN' and an incorrectly hashed *tidValue* in the Transformed Identifiers File.

File	Data
Data	<pre>{ "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1TY3782", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20231205, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", "roleStartDate": 20231205 }] }] }</pre>

File	Data
	<pre>], "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["TRUST"] }] } </pre>
TIDs	<pre> { "tidRecordList": [{ "customerRecordID": 1, "tidType": "EIN", "tidValue": "8727f10277set95f31fxm55898k09aa641c49d3df28e7074ae5335e94f61z12y" }] } </pre>

Repairing Submission with Optional Deletion of the Customer Record Rejection

Since the CAT Customer is required to be reported to the Reference Database in association with this FDID, the Industry Member must resubmit the FDID Record including the correct required CAT Customer association. Doing so repairs *rejectionID* '44433'.

Additionally, since the TID value was hashed erroneously in the original submission, submission of the correctly hashed TID value will not result in linking the repair to the rejection. Thus, the Industry Member opts to repair the Customer Record rejection using a *correctionAction* of 'DELETE'.

In this example, main-level JSON objects are included for clarity.

File	Data
Data	<pre> { "version": "1.0.0", "catReporterCRD": 55555, "catSubmitterID": 55555, "fdidRecordCount": 1, "naturalPersonCustomerRecordCount": 1, "legalEntityCustomerRecordCount": 0, "fdidRecordList": [{ "fdidRecordID": 1, "firmDesignatedID": "1TY3782", "fdidType": "ACCOUNT", "accountType": ["OTHER"], "fdidDate": 20231205, "clearingBrokerID": ["1234"], "fdidCustomerList": [{ "customerRecordID": 1, "role": "TRDHOLDER", </pre>

File	Data
	<pre> "roleStartDate": 20231205 }] }, "naturalPersonCustomerList": [{ "customerRecordID": 1, "customerType": ["TRUST"] }], "correctionList": [{ "rejectionID": 77799, "correctionAction": "DELETE" }] } </pre>
TIDs	<pre> { "version": "1.0.0", "tidRecordCount": 1, "tidRecordList": [{ "customerRecordID": 1, "tidType": "SSN/ITIN", "tidValue": "378ca6d8af479889d124c329061ea0762a9c87abc3c80fddb659804477531e1a" }] } </pre>