Industry Test Release Status

March 31, 2020

Agenda

- Industry Test Release Update
- General Announcements & Reminders
- Upcoming Key Dates
- Test Release 1.4 Screens
- Q&A

Industry Test Release Update

Industry Member 2a/2b - Release 1 (File & Data Integrity) Release Rollout

Live in Industry Test

11/18/2019 Industry Test Release 1.1

- CAT Reporter Portal: ATS Order Types
- CAT Reporter Portal: CAT Reporting Relationships
- Multi-Factor
 Authentication Enabled
- Publication of IMID & Conflict List to catnmsplan.com
- Publication of Issue/Option Symbol Reference Lists to catnmsplan.com

12/16/2019 Industry Test Release 1.2

- Industry Test Open for Machine-to-Machine File
 Data Integrity
 Validations & Feedback
- CAT Reporter Portal: Basic File Statistics
- CAT Reporter Portal: Manual File Upload

2/24/2020 Industry Test Release 1.3

- CAT Reporter Portal: File Submission feedback
- CAT Reporter Portal:
 Reporting Statistics (i.e.
 number of records
 received, accepted,
 rejected and feedback
 summaries)
- CAT Reporter Portal: Error Rates
- CAT Reporter Portal: Direct data entry & corrections
- CAT Reporter Portal: Bulk Repair of applicable Syntax/Semantic Errors

03/23/2020 Industry Test Release 1.4

- Announcements
- System Status

4/20/2020 – 2a Go-Live 5/18/2020 – 2b Go-Live

- 2a Go-Live Industry Member 2a Reporting Required on April 20
- 2b Go-Live Industry Member 2b Reporting Required on May 18

Industry Test Status – As of March 27, 2020 Statistics

Item	Statistic – Last Week	Statistic – This Week	Increase/Decrease
Number of Firms Certified	118	171	Increased by 53
Number of Firms operating under CAT Reporter Agreements	1,289	1,345	Increased by 56
Number of Reporting Relationships Entered	1,704 relationships from 953 firms	1,747 relationships from 973 firms	Increased by 43 across 20 firms
Number of ATS Order Types Entered	606 order types from 22 ATS firms	606 order types from 22 ATS firms	No change
Number of Total Submitters	151	155	Increased by 4
Number of IMIDs	1,048 from 696 firms	1,089 from 723 firms	Increased by 41 across 27 firms
Number of Files Received	1,395,464Reporter Portal: 18,095Private Line: 1,377,369	1,635,353Reporter Portal: 19,065Private Line: 1,616,288	Increased by 239,889Reporter Portal: 970Private Line: 238,919
Number of Files Rejected	371,461	385,509	Increased by 14,048
File Reject Rate	26.61%	23.57%	Decreased by 3.04%

Industry Test Status – March 23 – March 27, 2020 Statistics

	Product Type								
CAT Processing date	Equities			Options			DEL/Unparsed records		
	Processed	Rejected	Rejection Rate	Processed	Rejected	Rejection Rate	Processed	Rejected	Rejection Rate
3/23/2020	5,930,828,857	2,707,060	0.05%	86,290,142	7,367,421	8.54%	5,138	5,005	97.41%
3/24/2020	7,772,764,541	46,425,852	0.60%	258,874,489	61,983,539	23.94%	5,776,482	5,776,347	99.99%
3/25/2020	9,156,606,434	250,995,963	2.74%	266,520,696	64,129,075	24.06%	22,743,046	22,742,980	99.99%
3/26/2020	7,143,670,012	20,272,382	0.28%	70,166,377	2,538,393	3.62%	31,125,386	31,124,455	99.99%
3/27/2020	5,452,665,981	52,735,065	0.97%	313,344,324	36,627,146	11.69%	768,058	757,883	98.68%
Total	35,456,535,825	373,136,322	1.05%	995,196,028	172,645,574	17.35%	60,418,110	60,406,670	99.98%

FINRA CAT Open Issues List- As of 3/31/20

#	Status	Error Code	Summary	Resolution	Priority	Targeted Release Date	Area
1	Open	N/A	Reporter Portal is not accurately reflecting Repair Count and Adjusted Error Rate when corrections submitted for a single day per firm exceed 100,000. Additionally, Error Counts on Error Summary screen do not reflect errors in excess of 100,000.	Code Release	High	To be scheduled	Statistics
2	Open	2019	NYSE floor broker booth numbers are not included in reference data causing Route event rejections.	Reference Data Update	Medium	N/A	Reference Data
3	Open	Multiple	FINRA CAT is accepting the following scenario instead of rejecting – Future dates in some fields.	Code Release	Low	To be scheduled	Validations
4	Open	2133	For Name/Value Pair Data type fields, providing a value that is not in allowable values list returns error code 2133 (Additional Field) instead of error code 2101 (Missing or Invalid timeInForce).	Code Release	Low	To be scheduled	Validations
5	Open	2122	Incorrect error code is generated when an array field (e.g., clientDetails) is provided as a Name/Value pair.	Code Release	Low	To be scheduled	Validations
6	Open	2153	Isolated instances of data file not readable error for well-formed JSON and CSV data files.	Under Review	Low	To be determined	Validations
7	Open	N/A	Isolated issue with Timeout Warnings at Integrity phase resulting in missing File Integrity feedback.	Under Review	Low	To be determined	Feedback
8	NEW – Open	N/A	Reporter portal is not always displaying all the processed files in the File status screen.	Code Release	Low	4/1/2020	Reporter Portal
9	NEW – Open	1121	Few firms are incorrectly receiving file integrity errors due to pairing issues between the meta and data files.	Under Review	Low	To be determined	Validations

FINRA CAT Recently Closed Issues List

#	Status	Error Code	Summary	Resolution	Priority	Release Date	Area
1	Closed	N/A	Firms not getting credit for rejections corrected via a file delete instruction.	Code Release	High	3/23/2020	Statistics
2	Closed	N/A	Late flag determination is incorrect for events received after 4:15 PM and reported on time.	Code Release	High	3/23/2020	Statistics
3	Closed	N/A	Event Submissions count on Reporting Summary tab does not match the Event Submission by Type count in limited instances.	Code Release	High	3/23/2020	Portal
4	Closed	2060	Options test symbols are being rejected.	Code Release	High	3/23/2020	Validations
5	Closed	2081	receivedQuoteID (optional for 2a) blank - Rejecting as Invalid receivedQuoteID.	Code Release	Medium	3/23/2020	Validations/ Reporter Portal
6	Closed	2133	Multi-dimensional array fields in MEOTS, MOOF and MOFA events - Rejecting as invalid because portal includes additional fields (FDID and accountHolderType) that are not applicable to these specific events.	Code Release	Medium	3/23/2020	Reporter Portal
7	Closed	2142	Space in multi-dimensional array field not treated as blank. E.g space in aggregatedOrders when representativeInd is populated as 'YF', 'YE' or 'N' - Rejecting as Invalid aggregatedOrders (Error Code 2142).	Code Release	Medium	3/23/2020	Validations
8	Closed	N/A	FINRA CAT is accepting some timestamps with an invalid syntax.	Code Release	Medium	3/23/2020	Validations
9	Closed	1116	Isolated issue where exceeding length in file version field in metadata file - Not generating integrity failed feedback.	Code Release	Low	3/23/2020	Validations

Planned Industry Member Technical Specification Updates- Last Updated 3/24/2020

#	Status	Error Code	Summary	Resolution	Release Date	Area
1	Open	N/A	Update data type timestamp to clarify UTC time: Timestamps submitted in Coordinated Universal Time (UTC) must not be adjusted for Eastern Time. Timestamps submitted in STRING format must be in Eastern Time.	Documentation Update	To be scheduled	IM Technical Specification
2	Open	N/A	In instances where the market maker sends a market maker order through an options exchange protocol that does not require an exchange origin code, Industry Members must populate the exchOriginCode with a value of 'MM'.	Documentation Update	To be scheduled	IM Technical Specification
3	Open	N/A	v2.2.1 r3 was updated to note that the marketCenterID and REC fields are mutually exclusive. This language was updated in the marketCenterID field description but was not updated in REC field description.	Documentation Update	To be scheduled	IM Technical Specification
4	Open	N/A	Add values for LTSE: • marketCenterID: LT	Documentation Update	To be scheduled	IM Technical Specification
5	Open	N/A	Add values for MIAMI Pearl Equities: • destination: PEARLEQ • senderIMID: PEARLEQ • marketCenterID: H	Documentation Update	To be scheduled	IM Technical Specification
6	Open	N/A	Clarification for the population of Parent Key and Prior Key identifiers will be added to specify when a new Order Key, Trade Key or Fulfillment Key is not assigned, the Parent Key identifier or Prior Key identifier must remain blank; related Error Codes will be added.	Documentation Update	To be scheduled	IM Technical Specification

General Announcements & Reminders

FINRA CAT Announcements

- The staff of the SEC's Division of Trading and Markets has provided the Participants to the CAT NMS Plan with no-action relief from enforcing their CAT Compliance Rules with regard to CAT implementation deadlines against Industry Members. Such no-action relief will be in effect through May 20, 2020.
- ➤ FINRA CAT will keep its planned release schedule and will open the Production Environment on April 13, 2020. For those Industry Members that have completed the required production readiness certifications and are ready to begin reporting as of April 20, 2020, the CAT will be ready to accept CAT reports from Industry Members as of April 20, 2020.
- The certification window has been expanded given the SEC's no action letter. See the Participant's statement on the SEC's no-action relief for specific information about new dates for certification on cathmsplan.com.
- ➤ Rather than the previously scheduled Daily Industry Checkpoint Calls, Consolidated Audit Trail, LLC and FINRA CAT, LLC will maintain our Weekly Industry Checkpoint Calls on Tuesdays at 4:15 pm ET until further notice.
 - Effective Tuesday, April 7, 2020 attendance at the Weekly Industry Checkpoint Calls will require a password.
 On Wednesday, April 1, 2020, the password will be posted with the event on the CAT public website under Communication> Events.
- As of March 30, 2020, ping testing is available for PrivateLines in the Production Environment. Ping testing for SRG in the Production Environment will be available on April 2, 2020.

FINRA CAT Observations

File Submission – FINRA CAT Recommended Practice

- File Submissions should be one file per IMID within specified file maximums:
 - CAT Reporter Portal: 1GB uncompressed/100,000 records
 - Machine-to-Machine: 100GB uncompressed
- > Benefit to Submitters:
 - Fewer files for submitter to manage
 - Expedited feedback response

Note: SFTP (Machine-to-Machine) is **not** limited by 1GB/100,000 record limits on the Reporter Portal. Files may be up to **100GB** uncompressed which can contain significantly more than 100,000 records. As stated above, feedback times will be faster with fewer files.

FINRA CAT Reminders

- There is an upcoming Industry Webinar, Security of CAT Data, to be held at 3 pm ET on April 1, 2020.
- Duo MFA will not support devices running end-of-life operating systems after April 13, 2020.
- To ensure all securities reportable during any given transaction date are identified for reporting, firms are encouraged to use both the SOD and EOD files.

Onboarding – Certification of Production Readiness Testing

- ➤ Once CAT Reporters have completed **all** onboarding steps, including the successful completion of the Production Readiness Testing, each IM and CRA must contact the FINRA CAT Helpdesk (888-696-3348 or help@finracat.com).
- > The FINRA CAT Helpdesk will require the Processing Date(s) on which the testing occurred.
- Upon verification of the Production Readiness Testing and all other Onboarding Steps by FINRA CAT, CAT Reporters will be granted access to the CAT Production Environment, and a notification confirming access will be sent.

FINRA CAT Onboarding Guide is posted at https://catnmsplan.com/registration/

Onboarding – Certification of Production Readiness Testing Updates

- ➤ Reporting Relationships created on or prior to April 10, 2020 will be automatically ported to the Production Environment for IMs certified for Production by close of business on April 3, 2020.
 - Any relationships that IMs do not want to be automatically ported to the Production Environment should be expired by the Industry Member in the Test Environment with an Expiration Date prior to April 10, 2020.
 - Any relationships with an Expiration Date on or prior to April 10, 2020 will **not** be ported to the Production Environment.
 - Between April 13, 2020 and April 17, 2020, IMs that have been certified for Production must verify that all Reporting Relationships are correctly established in the Production Environment. If the IM does not want a Reporting Relationship that was automatically ported to Production, it must expire the relationship in the Production Environment.
 - After April 10, 2020, any Reporting Relationships that were not automatically ported to the Production Environment must be manually created in the Production Environment.
- ➤ IMs certified for Production after April 3, 2020 must manually enter all Reporting Relationships into the Production Environment.
- An updated Onboarding Guide is scheduled to be published this week and will include the new CRA Production Certification Requirements.

Upcoming Key Dates

Upcoming Key Dates for Release 2a/2b

Topic	Event	Date
Industry Call: Industry Testing Checkpoint	Weekly Industry Testing Checkpoint Calls – Every Tuesday at 4:15 pm (ET)	January 7, 2020 until further notice
Industry Test Release 1.4	Industry Test Release of: - CAT Reporter Portal Announcements & System Status	March 23, 2020
Connectivity	Ping Testing available for PrivateLines in Production Environment	March 30, 2020
Connectivity	Ping Testing available for the SRG in Production Environment	April 2, 2020
Connectivity	Ping Testing available for AWS PrivateLink (set up available after this date)	April 6, 2020
Industry Test Certification	Industry Members and CAT Reporting Agents must complete production readiness testing for 2a reporting	April 6, 2020*
Production Readiness	Production Environment Opens for Production Readiness	April 13, 2020
Production Go-Live	Production Go-Live for Equities 2a file submission and data integrity validations	April 20, 2020
Industry Call: Production Release Checkpoint	Regularly Scheduled Weekly Industry Testing Checkpoint Calls and Status of 2a Go-Live	April 21, 2020

^{*} As noted in the Participant's Statement on the SEC's No Action Letter, this date is now May 6, 2020.

Upcoming Key Dates for Release 2a/2b

Topic	Event	Date
Industry Test Certification	Industry Members and CAT Reporting Agents must complete production readiness testing for 2b reporting	May 4, 2020
Industry Call: Industry Testing Checkpoint	Daily Industry Testing Checkpoint Calls at 4:15 pm (ET)	May 4, 2020 – May 15, 2020
Production Go-Live	Production Go-Live for Options 2b file submission and data integrity validations	May 18, 2020
Industry Call: Production Release Checkpoint	Industry Call - Status of 2b Go-Live	May 19, 2020
Industry Webinar and Demo	Industry Webinar and Demo of Compliance Report Card	June 2, 2020
Production Go-Live	Release of Industry Member Compliance Report Card for Equities ONLY	June 19, 2020
Production Go-Live	Release of Industry Member Compliance Report Card including Equities and Options	July 20, 2020

Industry Test Release 1.4 Screens

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Reporting Feedback

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Error

Corrections

Report to CAT

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Reporting

Relationships

ATS Order

Types

12:18 PM EST 03/23/2020

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System Status: NORMAL

CAT Announcements

Experienced a delay in providing feedback for files s ubmitted between March 8 at...

FINRA CAT, LLC experienced a delay in providing feedback files for files submitted between Sunday, March 8 at 12:00 AM ET and Monday, March 9 at 9:05AM ET. As a result, some files received during this...

See More

1 Posted Recent CAT Exemption Request Letters and a Proposed Amendment

On March 3, 2020, Consolidated Audit Trail, LLC posted the following items to www.catnmsplan.com: ... See More

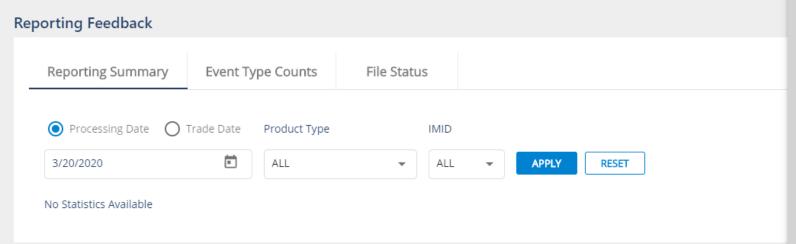
CAT Start of Day Files

Due to upstream data delays, the CAT Reportable Equity and
Options Securities Start of Day files and the Member ID
(IMID) List and Conflict List published this morning contain
data current as of Frida...
See More

(1) CAT Clock Synchronization Certification and Security of CAT Data Industry Webina...

Consolidated Audit Trail, LLC and FINRA CAT, LLC would like to remind the industry of the following: ... See More

See All Announcements





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Showing 1 to 5 of 6 Announcements >

2020-03-09 10:30:33

System Announcement

Experienced a delay in providing feedback for files submitted between March 8 at 12:00 AM ET and March 9 at 9:05AM ET

FINRA CAT, LLC experienced a delay in providing feedback files for files submitted between Sunday, March 8 at 12:00 AM ET and Monday, March 9 at 9:05AM ET. As a result, some files received during this time period may not receive feedback. Firms may resubmit these files at this time for processing,

Please contact the FINRA CAT Helpdesk at help@finracat.com or at (888) 696-3348 with any questions related to this content.

Hot Topic

2020-03-03 15:12:10

Posted Recent CAT Exemption Request Letters and a Proposed Amendment

On March 3, 2020, Consolidated Audit Trail, LLC posted the following items to www.catnmsplan.com:

- February 3, 2020, request for exemptive relief from certain provisions of the CAT NMS Plan related to timestamp granularity and relationship identifiers.
- February 3, 2020, request for exemptive relief from certain provisions of the CAT NMS Plan related to the definition of "Small Industry Member" under the CAT NMS Plan.
- February 12, 2020, request for exemptive relief from certain provisions of the CAT NMS Plan related to data facility reporting and linkage.
- February 19, 2020, request for exemptive relief from certain provisions of the CAT NMS Plan related to the implementation of a phased Industry Member reporting timeline.
- February 27, 2020, proposed amendment to the CAT NMS Plan that would revise data reporting requirements for the reporting of "Firm Designated ID" to the CAT.

Please contact the FINRA CAT Helpdesk at help@finracat.com or at (888) 696-3348 with any questions related to this content.

How to Ask a Question during Today's Call

For participants using computer audio:

- Click the "Participants" button at the bottom of the app window, then the "Raise Hand" button at the bottom of the participants window.
- A visual prompt will indicate that your line has been unmuted.

For participants using phone audio:

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

FINRA CAT Helpdesk

Questions may be directed to the FINRA CAT Helpdesk at 888-696-3348 or help@finracat.com