Consolidated Audit Trail

Customer and Account Information System (CAIS)

Updates to Specification for Firm Designated ID (FDID) and Large Trader ID (LTID)

4/17/2020

Key Update Types

▸ Unified naming approach for Reporter Portal

  ◦ 'CAT Reporter Portal' for transactions, 'CAT Reporter Portal – CAIS' for customer and account functionality

  ◦ Indicates a unified solution, but separated functionality

▸ Clarifications for usage of correctionList functionality

  ◦ Add guidance for users that correctionList is limited to use for only two errors – malformed or missing FDID, and malformed or missing LTID - that could not be corrected by resubmitting data on the same record

▸ Renamed final file processing state names in Feedback file to clarify next steps

  ◦ Split '**Completed**' into '**Completed – With Rejections**' and '**Completed – Without Rejections**'

  ◦ Renamed '**File Integrity Error**' to '**Completed – File Integrity Error**'

▸ Added failedCorrectionItems section to Feedback file

  ◦ Prior approach did not provide a means to link feedback to correctionList records that could not be processed

▸ Expansion of Error Codes (Slide 3)

▸ Modified approach to nullifying previously accepted attributes (Slide 4)

Expansion of Error Codes

▶ Added Data Layer Validation Error Codes

  ◦ Because CAIS file submissions may be deltas, it is necessary to validate certain incoming record attributes against previously stored attributes for conflicts. For example:

   • A CAT Reporter Firm initially submits FDID Money999 with an FDID Date of 20200415 and an LTID of 12345678-0000 with an LTID Effective Date of 20200415.

   • FDID Money999 is accepted into CAIS without error.

   • Later, the CAT Reporter Firm determines the account didn't open as planned, and submits FDID Money999 with a new FDID Date of 20200419 – but does not resend the LTID.

   • It now appears as if the FDID was opened on 4/19, but had an LTID associated on 4/15 – before the account was open. Data Layer Validations will identify the conflict against previously accepted data and reject the new submission.

   • It would also be acceptable for the CAT Reporter Firm to submit FDID Money999 with the new FDID Date of 20200419, so long as they also resubmit LTID 12345678-0000 with an LTID Effective Date of 20200419 or later.

▶ Added and modified Error Codes based on development and testing efforts

Nullifying Previously Accepted Attributes

▸ Certain attributes were able to be sent with a *NULL* value, in order to nullify a previously accepted value

  ◦ As an example, a CAT Reporter Firm may have previously set the fdidEndDate and fdidEndReason for an FDID, but later reopened the account or determined the FDID was ended in error.
  ◦ This required the firm to submit a *NULL* value for fdidEndDate and fdidEndReason.
  ◦ The NULL value approach caused issues in determining when an attribute was intentionally not included in the file versus when it was included with the *NULL* value.

▸ In order to remove confusion, *NULL* is no longer an acceptable value to include for any CAIS attribute.

▸ New paired *NULL* fields – for example, fdidEndDate and fdidEndDateNULL – have been added

▸ In order to nullify the stored field, the NULL field would be submitted as *true*

▸ Submitting both fields – ie, fdidEndDate and fdidEndDateNULL – would cause a rejection of the FDID record

Current Field	New Paired Field
fdidEndDate	fdidEndDateNULL
fdidEndReason	fdidEndReasonNULL
replacedByFDID	replacedByFDIDNULL
ltidEndDate	ltidEndDateNULL
ltidEndReason	ltidEndReasonNULL