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# Industry CAT CAIS LTID Test Release Status

April 7, 2021

# Agenda

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- Industry Test Release Update
- Open Issues List
- Recently Closed Issues
- Planned Enhancements
- General Announcements & Reminders
- Q&A

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# Industry CAT CAIS LTID Test Release Update

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# Industry Member Release Rollout

## Live in Industry Test

08/20/2020

CAIS LTID Registration

08/24/2020

Industry Test Release  
CAIS LTID 1.0

- CAIS LTID Reporter Portal Industry Test Open
- Industry Test Open for Machine-to-Machine File & Data Integrity Validations & Feedback
- CAIS LTID Reporter Portal Manual Submission and File Upload

10/05/2020

CAIS LTID Certification  
Opens

- CAIS LTID Reporter Certification
- CAIS LTID Reporting Agent Certification
- CAIS LTID Registration Deadline for firms expecting to submit

12/14/2020

CAIS LTID Production  
Opens

- CAIS LTID Reporter Portal Production Opens
- CAIS LTID Production Opens for Machine-to-Machine File & Data Integrity Validations & Feedback
- CAIS LTID Reporter Portal Manual Submission and File Upload
- CAIS LTID Reporter Statistics available

4/26/2021

CAIS LTID Mandatory  
Reporting

- CAIS LTID reporting required for Phases 2a, 2b, and 2c (Large Industry Members)
- CAIS LTID Rejection Repair timeline enforced

# Industry Test Status CAIS LTID – As of April 6<sup>th</sup>, 2021

|                            | Test Environment  |   |              | Production Environment                              |   |              |
|----------------------------|---|---|--------------|---|---|--------------|
|                            | Last Week   | This Week   | Change (+/-) | Last Week   | This Week   | Change (+/-) |
| Number of Firms Registered | 1,108 (thru 3/25)                                       | 1,145 (thru 4/2)  | + 37         |   |   |              |
| Number of Firms Certified  | 385 (thru 3/25)   | 571 (thru 4/2)  | + 186        |   |   |              |
| Number of Total Submitters | 140   | 165   | + 25         | 32  | 38  | + 6          |
| Number of Unique Firms     | 761   | 887   | + 126        | 33  | 39  | + 6          |
| Number of Files Received   | Total: 25,372<br>Reporter Portal: 2,219<br>SFTP: 23,153 | Total: 28,304<br>Reporter Portal: 2,774<br>SFTP: 25,530 | + 2,932      | Total: 3,094<br>Reporter Portal: 730<br>SFTP: 2,364 | Total: 3,304<br>Reporter Portal: 839<br>SFTP: 2,465 | + 210        |
| Number of Files Rejected   | 5,171   | 5,274   | + 103        | 3   | 8   | + 5          |
| File Reject Rate           | 20.38%  | 18.63%  | -1.75%       | 0.10%   | 0.24%   | +0.14%       |

# Industry Test Status CAIS LTID – March 22<sup>nd</sup> – April 4<sup>th</sup>, 2021 Statistics

|                       | Test Environment               |                  |            | Production Environment |                  |         |
|-----------------------|--------------------------------|------------------|------------|------------------------|------------------|---------|
| CAT Processing Date   | 3/22/21 – 3/28/21 <sup>1</sup> | 3/29/21 – 4/4/21 | Totals     | 3/22/21 – 3/28/21      | 3/29/21 – 4/4/21 | Totals  |
| Records Accepted      | 11,763,489                     | 21,686,956       | 33,450,445 | 96,175                 | 31,013           | 127,188 |
| Records Rejected      | 1,600,471                      | 905,787          | 2,506,258  | 7                      | 5                | 12      |
| Total Records         | 13,363,960                     | 22,592,743       | 35,956,703 | 96,182                 | 31,018           | 127,200 |
| Record Rejection Rate | 11.98%                         | 4.01%            | 6.97%      | 0.01%                  | 0.02%            | 0.01%   |

<sup>1</sup> The Test Environment counts were updated after a discrepancy with the query was identified.

# CAT CAIS LTID Reporting Certification

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- Certification opened on October 5<sup>th</sup> – giving Industry Members and their Reporting Agents over 6 months to certify prior to the CAIS LTID compliance deadline.
- **Deadline to request Production Readiness Certification is April 9th**
- The CAIS LTID test environment will be used for certification, **after 4/26 certification must be conducted in Prod Mirror** as the Industry Test environment will be unavailable.
- Registration for CAIS LTID requires Reporters to indicate their approximate number of FDIDs that have associated LTIDs.
- For Reporting Agents, this should be the aggregate total of all FDIDs with associated LTIDs.
- Only Reporters and Reporting Agents that pass certification will be able to submit data into the Production environment.

# CAIS LTID Certification Requirements

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- Reporters must successfully submit FDIDs with LTIDs with an error rate of 10% or less.
- Reporters with fewer than 100 FDIDs with LTID associations should submit all of their FDIDs to be certified. Reporters with 100 or more FDIDs with LTIDs should submit at least 100 FDIDs to be certified.
- Reporters with no accounts with LTID associations may certify using mock data to demonstrate their ability to successfully format for and transmit data to CAIS. – Updated guidance in the Onboarding Guide, published on 9/15
- Reporting Agents should use the aggregate total of all FDIDs with associated LTIDs to determine their Certification level, however they should include at least one FDID from every CRD for which they report.
- Reporters that have no LTIDs to report should still complete the LTID Registration form in order to be able to quickly Certify and report if or when they have a reporting requirement in the future.



# CAT CAIS LTID Open Issues List – As of 04/06/2021

## Release Planned/Workaround Provided

| # | Status | Error Code | Issue Summary   | Resolution   | Priority | Test Environment Targeted Release Date/Workaround  | Production Environment Targeted Release Date/Workaround  | Area Affected            |
|---|--------|------------|---|--------------|----------|--|--|--------------------------|
| 1 | Open   | N/A        | Using Private Line or Private Link, logout from MDP does not automatically logout user on CAIS – (SRG works fine).                                    | Code Release | Low      | <b>Workaround:</b> User navigates to CAIS and clicks logout button. User automatically logged out after 30 mins inactivity.<br><br>Resolving this issue requires updates to TDS Reporter Portal, which are not scheduled yet.<br><b>Fix:</b> Release planning in progress. | <b>Workaround:</b> User navigates to CAIS and clicks logout button. User automatically logged out after 30 mins inactivity.<br><br>Resolving this issue requires updates to TDS Reporter Portal, which are not scheduled yet.<br><b>Fix:</b> Release planning in progress. | Reporter Portal          |
| 2 | Open   | N/A        | OutOfMemoryError in Submission Engine. When attempting to compile feedback file, submission engine runs out of memory if too many rejections present. | Code Release | Medium   | <b>Workaround:</b> Rejections reported in feedback file restricted to 1000 and error code 23999 returned in feedback file.<br><b>Fix:</b> 1.2.2 Deployment – TBD   | <b>Workaround:</b> Rejections reported in feedback file restricted to 1000 and error code 23999 returned in feedback file.<br><b>Fix:</b> 1.2.2 Deployment – TBD   | Submission Feedback File |
| 3 | Open   | N/A        | Missing attributes in certain versions of feedback file; should be present in all versions (“receiptTimestamp” and various “Count” attributes).       | Code Release | Low      | <b>Fix:</b> Update Validation and Submission engine to add the missing attributes.<br>1.2 Deployment – 4/11/21   | <b>Fix:</b> Update Validation and Submission engine to add the missing attributes.<br>1.2 Deployment – 4/25/21   | Reporter Portal          |
| 4 | Open   | N/A        | Unexpected 400 error occurs when submitted “reporterCRD” value exceeds numeric limit; should return invalid CRD error.                                | Code Release | Low      | <b>Fix:</b> Return invalid CRD error when “reporterCRD” value exceeds numeric limit.<br>1.2 Deployment – 4/11/21   | <b>Fix:</b> Return invalid CRD error when “reporterCRD” value exceeds numeric limit.<br>1.2 Deployment – 4/25/21   | Reporter Portal          |

# CAT CAIS LTID Open Issues List – As of 04/06/2021

## Release Planned/Workaround Provided

| # | Status     | Error Code | Issue Summary  | Resolution   | Priority | Test Environment Targeted Release Date/Workaround  | Production Environment Targeted Release Date/Workaround  | Area Affected   |
|---|------------|------------|--|--------------|----------|--|--|-----------------|
| 5 | Open       | 21006      | Error occurs when sequence of read, delete, insert functions happen out of order during parallel file processing.  | Code Release | Low      | Completed on 3/28/21   | <b>Workaround:</b> Resubmitting file should work.<br><b>Fix:</b> Update submission processing to avoid out of order processing.<br>1.1.5 Deployment – 4/11/21                  | Reporter Portal |
| 6 | Open       | 21020      | Invalid Submission File extension causes submission to stall. Should return integrity error.   | Code Release | Low      | Completed on 3/28/21   | <b>Fix:</b> Change submission processing to return integrity error when invalid file extension is used.<br>1.1.5 Deployment – 4/11/21  | Reporter Portal |
| 7 | NEW – Open | N/A        | If a user uploads 2 files with the same file name in rapid succession, the first submission can get stuck. The second one will successfully process.           | Code Release | Low      | <b>Fix:</b> Update submissions processing so that duplicate file submissions only create one unique submission id.<br>1.2 Deployment – 4/11/21 | <b>Fix:</b> Update submissions processing so that duplicate file submissions only create one unique submission id.<br>1.2 Deployment – 4/25/21                                 | Reporter Portal |
| 8 | NEW – Open | N/A        | If a firm submits using an invalid FDID type, the submission will not process successfully.  | Code Release | Low      | <b>Fix:</b> Update submission processing to return a record level rejection for an invalid FDID type.<br>1.2 Deployment – 4/11/21              | <b>Fix:</b> Update submission processing to return a record level rejection for an invalid FDID type.<br>1.2 Deployment – 4/25/21  | Reporter Portal |
| 9 | NEW – Open | 23007      | If a firm attempts to clear the end date using ItidEndDate: NULL and set a new ItidEffectiveDate in the same submission, they will receive an integrity error. | Code Release | Low      | Completed on 3/28/21   | <b>Fix:</b> Change submission processing to allow clearing an ItidEndDate using NULL and setting a new ItidEffectiveDate in the same submission.<br>1.1.5 Deployment – 4/11/21 | Reporter Portal |

# CAT CAIS LTID Recently Closed Issues List – As of 04/06/2021

| # | Status       | Error Code | Issue Summary <sup>15</sup>  | Resolution   | Priority | Test Environment Release Date | Production Environment Release Date | Area Affected   |
|---|--------------|------------|--|--------------|----------|-------------------------------|-------------------------------------|-----------------|
| 1 | NEW – Closed | 22020      | Errant "largeTraderRecordID" in feedback file and should not be when error code associated to FDID.  | Code Release | Complete | 2/28/21                       | 3/14/21                             | Reporter Portal |
| 2 | NEW – Closed | N/A        | Errant 'expiration date' in one or more CRD reporting relationships – CAIS file validation terminates – unable to parse relationship data  | Code Release | Complete | 2/28/21                       | 3/14/21                             | Reporter Portal |
| 3 | NEW – Closed | N/A        | Feedback file – misalignment. FailedCorrectionItem is currently paired with rejectionID. This should be paired with failedRejectionID.   | Code Release | Complete | 12/6/20                       | 12/13/20                            | Reporter Portal |
| 4 | NEW – Closed | N/A        | TypeError when submission file contains a decimal in an integer field. This should result in a data-type error.  | Code Release | Complete | 2/28/21                       | 3/14/21                             | Reporter Portal |
| 5 | NEW – Closed | N/A        | CRD Dropdown in CAIS Reporter Portal doesn't allow scrolling for a large list.   | Code Release | Complete | 3/14/21                       | 3/14/21                             | Reporter Portal |
| 6 | NEW – Closed | 21006      | Rejection Report CSV: Downloadable rejection report contains errant record set for file integrity error 21006. Expected behavior is file integrity errors do not populate rejection report CSV download. | Code Release | Complete | 2/28/21                       | 3/14/21                             | Reporter Portal |

# CAT CAIS Planned Enhancements – Open

| # | Status     | Error Code                                | Summary  | Resolution   | Priority | Test Environment Targeted Release Date | Production Environment Targeted Release Date | Area                   |
|---|------------|---|--|--------------|----------|--|--|------------------------|
| 1 | NEW - Open | N/A                                       | CAT CAIS will allow SFTP users to delete any files within the feedback directory. This is agnostic of origin for the posted file - SFTP or UI - and may allow firms to delete UI posted files that a user hasn't downloaded the feedback for. This is consistent with the functionality of the Transaction system.   | Code Release | Low      | 1.2.2 - TBD                            | 1.2.2 - TBD                                  | Reporter Portal / SFTP |
| 2 | NEW – Open | 22025<br>22026<br>22027<br>23002<br>23003 | The noted error codes were deprecated in the LTID Technical Specification published on 3/23, as part of the LTID date validation relaxation. The relaxed validation functionality was not released to the Test Environment until 3/28, and will not be released to the Production Environment until 4/11. During the time period between the publication of the updated Technical Specification and release of the functionality, firms will still receive these errors against their submissions. | Code Release | Low      | Completed on 3/28/2021                 | 1.1.5 - 4/11/2021                            | Reporter Portal / SFTP |

# CAT CAIS Planned Enhancements – Closed

| # | Status       | Error Code | Summary  | Resolution   | Priority | Test Environment Targeted Release Date | Production Environment Targeted Release Date | Area                  |
|---|--------------|------------|--|--------------|----------|--|--|-----------------------|
| 1 | NEW - Closed | 22013      | <p>CAT CAIS will accept alpha characters in <i>largeTraderRecordID</i> field for ULTID records.</p> <p>For ULTID records, the identifier must start with 'ULT', followed by alphanumeric [0-9A-Z] characters for the fourth through eighth positions, followed by a dash, followed by four alphanumeric [0-9A-Z] characters. (e.g., ULTXXXXX-XXXX)</p> | Code Release | High     | 3/1/21                                 | 3/15/21                                      | Ingestion Validations |

# CAT CAIS- Planned LTID Phase Specification Updates

| # | Status | Summary  | Publish Date | Spec Version |
|---|--------|--|--------------|--------------|
| 1 | Open   | Clarify FDID rules and character handling after conversion from Alphanumeric to Text data type   | April 2021   | 1.2r2        |
| 2 | Open   | Clarify that both Submitters and CAT Reporter Firms will have access to the Feedback File when the Submitter is submitting on behalf of another firm | April 2021   | 1.2r2        |
| 3 | Open   | Revise the statement in Section 6.1.1 - Feedback Generation - to reflect the current feedback file versioning approach.                              | April 2021   | 1.2r2        |

# CAT CAIS-

## Planned Full CAIS Phase Specification Updates

| # | Status | Summary  | Publish Date | Spec Version |
|---|--------|--|--------------|--------------|
| 1 | Open   | Clarify FDID rules and character handling after conversion from Alphanumeric to Text data type   | April 2021   | 2.0r2        |
| 2 | Open   | Clarify that both Submitters and CAT Reporter Firms will have access to the Feedback File when the Submitter is submitting on behalf of another firm   | April 2021   | 2.0r2        |
| 3 | Open   | Revise the statement in Section 6.1.1 - Feedback Generation - to reflect the current feedback file versioning approach.  | April 2021   | 2.0r2        |
| 4 | Open   | Update description for the <i>bankDepositoryID</i> and <i>primeBrokerID</i> attributes to note they are only required when the <i>accountType</i> attribute contains a value of DVP/RVP                          | April 2021   | 2.0r2        |
| 5 | Open   | Change the <i>bankDepositoryID</i> , <i>primeBrokerID</i> , and <i>clearingBrokerID</i> to be Array type attributes rather than Alphanumeric, allowing a firm to report multiple values for a single FDID record | April 2021   | 2.0r2        |
| 6 | Open   | Incorporate the changes to validations that compare FDID dates to the LTID dates of associated LTIDs from the LTID Phase specification update  | April 2021   | 2.0r2        |
| 7 | Open   | Add <i>correspondentCRD</i> attribute to the Main JSON Object Level, allowing firms to denote reporting of customer and account data of a correspondent introducing broker firm                                  | April 2021   | 2.0r2        |
| 8 | Open   | Change approach to submissions, to allow reporting of a single customer record in a single submission record with differing data   | April 2021   | 2.0r2        |
| 9 | Open   | Remove Material and Minor Inconsistency against First Name and Last Name of Natural Person CAT Customers   | April 2021   | 2.0r2        |

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# General Announcements & Reminders

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# Announcements

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- CAT CAIS Reporting Scenarios v1.2 was updated on 4/5 on the CATNMS Plan website - ULTID Formatting Change and the LTID to FDID Date Validation Relaxation
- Bi-weekly CAIS Technical Specification Working Group calls started on 3/2. Next meeting is scheduled for 4/20.

# FINRA CAT Reminders

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- CAT CAIS LTID Checkpoint Calls to be held monthly on Wednesdays at 4:15 E.T. – the next call is scheduled for May 5<sup>th</sup> in combination with the TID Webinar
- Connectivity Guides, Reporting Scenarios, Use Cases, and updated FAQs available at [catnmsplan.com](http://catnmsplan.com)

# FINRA CAT Helpdesk

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

# How to Ask a Question during Today's Call

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- **For participants using computer audio:**
  - Click the “Raise Hand” button at the bottom of the participants window.
  - A visual prompt will indicate that your line has been unmuted.
- **For participants using phone audio:**
  - Enter \*9 on your phone keypad.
  - An audio prompt will indicate that your line has been unmuted.