

Phase 2c Cutover- Transitioning from Phase 2a/2b to Phase 2c Data Submissions

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1. Revisions Summary

Version	Publish Date	Description
1.0	3/23/2021	Initial publication.
1.1	4/6/2021	Revised to include that for errors returned in JSON format, the TIF code on MEOJ event will be populated with a “dummy” value of ‘AAA’.
1.2	4/20/2021	Added Appendix- Transition Support Sample Files.

2. Summary

This CAT Alert describes the Industry Member CAT Reporting Test Plan for Phase 2c and how Industry Members must transition from Phase 2a/2b to Phase 2c data submissions to the Industry Member Test and Production Environments.

As of January 26, 2021, the CAT Industry Member Test Environment (“Test Environment”) is available for testing of Phase 2c data only. All metadata and data files submitted to the Test Environment must be formatted per the schema definitions and requirements for Phase 2c. Also, as of January 26, 2021, a new Production Mirror (“Prod-Mirror”) Environment has been established for continued testing of Phase 2a/2b Industry Member data.

The Phase 2c Production Go-Live date is April 26, 2021. The transition from the Phase 2a/2b to Phase 2c schema in the CAT Industry Member Production Environment (“Production Environment”) will begin at approximately 8 am ET on April 26, 2021 via a code deployment. Prior to code deployment, all

submissions to the Production Environment must be in Phase 2a/2b format, no matter the Trade Date. Starting at approximately 8 am ET on April 26, 2021, all submissions, no matter the Trade Date, to the Production Environment must be in the Phase 2c format, as described in the Phase 2c schema and CAT Reporting Technical Specifications for Industry Members.

In addition, beginning on April 26, 2021, linkage errors will be returned in the Phase 2c format. FINRA CAT is aware that this may cause repair and resubmission challenges for some Industry Members. FINRA CAT will provide support, as described below, during the transition period between Phase 2a/2b and Phase 2c.

3. Test Environment Plan Overview

FINRA CAT's Test Plan for Industry Members uses the CAT Test and Production Environments in concert to facilitate efficient testing for Industry Members and CAT Reporting Agents. As such, and as noted above, as of January 26, 2021, the Industry Test Environment is available for testing of Phase 2c data only. All metadata and data files submitted to the Test Environment must be formatted per the schema definitions and requirements for Phase 2c. Any data submitted to the Industry Test Environment in Phase 2a/2b format will be rejected.

A *new* Prod-Mirror Environment must be used for continued Industry Member testing of Phase 2a/2b data. New URLs have been assigned for the Prod-Mirror Environment and may be found in the [FINRA CAT Connectivity Supplement for Industry Members](#). Please note, existing test user accounts can be leveraged to access the Prod-Mirror Environment. In addition, any Reporting Relationships and ATS Order Types that were established in the Industry Test Environment as of December 18, 2020, were replicated and are now available in the Prod-Mirror Environment. Any changes made to Reporting Relationships and ATS Order Types on or after December 18, 2020 must be made directly in the Prod-Mirror Environment.

4. Production Environment Plan Overview

The Phase 2c Production Go-Live date is April 26, 2021. Beginning at approximately 8 am ET on April 26, 2021, all data submissions to the Production Environment must be in Phase 2c format. All metadata and data files must follow schema version 3.1.0 or higher. Any files that are received after code deployment on April 26, 2021 with a prior version will reject. All data, including late events, repairs and corrections for events that originated prior to code deployment on April 26, 2021 must be reported in the Phase 2c format. A detailed list of schema changes between Phase 2a/2b and Phase 2c, including new events, new fields and new/removed values was provided in two Industry Webinars: [Phase 2c Cutover- Part 2 and Weekly Industry Testing Checkpoint Call \(1/19/2021\)](#) and [Phase 2c Cutover and November 2020 Technical Specifications Overview \(11/17/2020\)](#). Please refer to these webinars as well as the [Phase 2c](#)

[Industry Member Technical Specifications](#) for more information on differences in the schema requirements.

Industry Members may need to repair a file and/or record that was submitted in the Phase 2a/2b format prior to code deployment April 26, 2021. If the repair will be submitted after code deployment on the Phase 2c Go-Live date, the file or record must be repaired and resubmitted in the Phase 2c format. For example, an event that occurred on CAT Trading Day April 23, 2021 is submitted to CAT by 8 am ET on April 26, 2021 in the Phase 2a/2b format. Linkage feedback on this record will be returned in the Phase 2c format by 12 pm ET April 26, 2021. Repairs made to this record after code deployment on calendar day April 26, 2021 must be submitted in the Phase 2c format. CAT Reporters will have the ability to make repairs via the Reporter Portal in the Phase 2c format after the Phase 2c code deployment is complete (see Section 3, “Phase 2c Cutover Deployment Timeline”).

The table below shows that submissions for CAT Trading Days April 20 through April 23, 2021 must be in Phase 2a/2b format while submissions on April 26 through April 29, 2021 must be made in Phase 2c format. The feedback format will be determined by the date on which linkage feedback is delivered.

CAT Trading Day	Submission Due Date	Submission Format	Feedback Delivered By							
			4/21 12pm	4/22 12pm	4/23 12pm	4/26 12pm	4/27 12pm	4/28 12pm	4/29 12pm	4/30 12pm
4/20	4/21 8am	2a/2b	1	2	3	4				
4/21	4/22 8am	2a/2b		1	2	3	4			
4/22	4/23 8am	2a/2b			1	2	3	4		
4/23	4/26 8am	2a/2b				1	2	3	4	
4/26	4/27 8am	2c					1	2	3	4
4/27	4/28 8am	2c						1	2	3
4/28	4/29 8am	2c							1	2
4/29	4/30 8am	2c								1

Recognizing the challenge of converting from Phase 2a/2b to Phase 2c format, FINRA CAT will support the transition by providing linkage feedback in the Phase 2c format beginning with the processing date of April 23, 2021, which is delivered by noon on April 26, 2021 in the following manner:

For errors returned in CSV format, new fields applicable to Phase 2c will be represented with a delimiter; no values will be populated in those fields.

For errors returned in JSON format:

- New required non-Boolean field (TIF code on MEOJ event): a “dummy” value of ‘AAA’ will be populated. This value meets the data type requirement but is not an allowable value that will pass data integrity validations.
- New required Boolean fields will not be added.
- New conditional fields will not be added.

Note that while feedback will be provided in a format that is syntactically correct, Industry Members will still be required to take action to add any required field values and/or fields that apply to the record. Boolean fields that are not present are interpreted by CAT to be “false”, and action must be taken to populate the fields if the value is not “false”. Conditional fields that are not present are interpreted as “not applicable”, and action must be taken to populate the fields if they are applicable.

5. Phase 2c Cutover Deployment Timeline

The transition from the Phase 2a/2b to Phase 2c schema in the Production Environment will begin at approximately 8 am ET on April 26, 2021. FINRA CAT will communicate the completion of the code deployment via email and System Announcements. It is recommended that submissions for the April 26, 2021 CAT Processing Date should not begin until notification that the Phase 2c deployment is complete.

6. Phase 2c Cutover Resources

- [Phase 2c Industry Member Technical Specifications](#)
- [Phase 2c Industry Member Schema](#)
- [Phase 2c Cutover- Part 2 and Weekly Industry Testing Checkpoint Call \(1/19/2021\)](#)
- [Phase 2c Cutover and November 2020 Technical Specifications Overview \(11/17/2020\)](#)

7. Appendix- Transition Support Sample Files

The tables below illustrate examples of Linkage Error Feedback in Phase 2c format when an Industry Member submits a file in Phase 2a/2b format.

JSON Submission	
Input Data File Content	<pre> {"actionType":"NEW","firmROEID":"20210414_MEOJ-HP-NW","type":"MEOJ","CATReporterIMID":"ZZZT1","orderKeyDate":"20210414T105519.000508","orderID":"OrderID_10000822283","symbol":"GOOG","eventTimestamp":"20210414T095519.000508","manualFlag":false,"initiator":"C"} {"actionType":"NEW","firmROEID":"20210414_MEOA-HP-NW","type":"MEOA","CATReporterIMID":"ZZZT1","orderKeyDate":"20210414T115519.000508","orderID":"OrderID_106678","symbol":"GOOG","eventTimestamp":"20210414T115519.000508","manualFlag":false,"electronicDupFlag":false,"receiverIMID":"99999999:ZZZT1","senderIMID":"88888888:ABCD1","senderType":"F","routedOrderID":"RoutedID_01","affiliateFlag":false,"deptType":"O","side":"B","price":29.5,"quantity":500,"minQty":300,"orderType":"LMT","timeInForce":{"DAY":"20210414"},"tradingSession":"POST","isoInd":"NA","handlingInstructions":{"DISQ":1000,"STOP":9.99},"custDspIntrFlag":false,"infoBarrierID":"AGENCY"} {"actionType":"NEW","firmROEID":"20210414_MEOA-HP-NW-2","type":"MEOA","CATReporterIMID":"ZZZT1","orderKeyDate":"20210414T115519.000508","orderID":"OrderID_106678","symbol":"GOOG","eventTimestamp":"20210414T115519.000509","manualFlag":false,"electronicDupFlag":false,"receiverIMID":"99999999:ZZZT1","senderIMID":"88888888:ABCD1","senderType":"F","routedOrderID":"RoutedID_01","affiliateFlag":false,"deptType":"O","side":"B","price":29.5,"quantity":500,"minQty":300,"orderType":"LMT","timeInForce":{"DAY":"20210414"},"tradingSession":"POST","isoInd":"NA","handlingInstructions":{"DISQ":1000,"STOP":9.99},"custDspIntrFlag":false,"infoBarrierID":"AGENCY"} {"actionType":"NEW","firmROEID":"20210414_MEQR-HP-NW","type":"MEQR","CATReporterIMID":"ZZZT1","quoteKeyDate":"20210414T115519.000508","quoteID":"QuoteID_10000000410266","symbol":"GOOG","receivedQuoteID":"Rcvd_QuoteID_134","eventTimestamp":"20210414T105519.000508","seqNum":"54540006","receiverIMID":"99999999:ZZZT1","senderIMID":"88888888:ABCD1","onlyOneQuoteFlag":false,"bidPrice":10.5,"bidQty":4,"mpStatusCode":"O","unsolicitedInd":"U","quoteWantedInd":"B"} {"actionType":"NEW","firmROEID":"20210414_MEQR-HP-NW-2","type":"MEQR","CATReporterIMID":"ZZZT1","quoteKeyDate":"20210414T115519.000508","quoteID </pre>

JSON Submission	
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JSON Submission	
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JSON Submission	
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JSON Submission	
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CSV Submission	
Input Data File Content	<pre> NEW,,20210414_MEOJ-CSV- NW,MEOJ,ZZZT1,20210414T105519.000508,OrderID_10000822283,GOOG,,,,,20210414T145519.000508,FALSE,,C,,,,,,,,,,,,, </pre>

CSV Submission	
	<p>NEW,,20210414_MEOA-CSV- NW,MEOA,ZZZT1,20210414T105519.000508,OrderID_106678,GOOG,20210414T115519.000508,FALSE,FALSE ,,99999999:ZZZT1,88888888:ABCD1,F,RoutedID_01,,,FALSE,O,B,29.5,500,300,LMT,DAY=20210414,POS T,NA,DISQ=1000 STOP=9.99,FALSE,AGENCY,,,,,,,,,,,,,</p>
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	<p>NEW,,20210414_MEQR-CSV- NW,MEQR,ZZZT1,20210414T105519.000508,QuoteID_1000000410266,GOOG,Rcvd_QuoteID_134,20210414T 105519.000508,54540006,99999999:ZZZT1,88888888:ABCD1,FALSE,,,10.5,4,,,O,U,B</p>
	<p>NEW,,20210414_MEQR-CSV-NW- 2,MEQR,ZZZT1,20210414T105519.000508,QuoteID_1000000410266,GOOG,Rcvd_QuoteID_134,20210414T1 05519.000508,54540008,99999999:ZZZT1,88888888:ABCD1,FALSE,,,10.5,4,,,O,U,B</p>
	<p>NEW,,20210414_MEOT-CSV- NW,MEOT,ZZZT1,20210414T115519.000508,TradeID_1000000888801,GOOG,20210414T105519.000508,FAL SE,,TRUE,20210414T105519.000508,,,500,25.5,A,TapeTradeID_1000000999901,L,NA,,,,,,,,,,,,,</p>
	<p>NEW,,20210414_MEOT-CSV-NW- 2,MEOT,ZZZT1,20210414T115519.000508,TradeID_1000000888801,GOOG,20210414T105519.000509,FALS E,,TRUE,20210414T105519.000508,,,500,25.5,A,TapeTradeID_1000000999902,L,NA,,,,,,,,,,,,,</p>
	<p>NEW,,20210414_MENO-CSV- NW,MENO,ZZZT1,20210414T105519.000508,OrderID_10056002,GOOG,20210414T114519.000508,FALSE,FAL SE,,,,DMA,,,SS,999.99,333,300,LMT,DAY=20210414,POST,DISQ=1000 STOP=9.99,FALSE,abcd1278,F,TR UE,ert549890,01235@20210414T092316.123456789@@,FALSE,Y,,,,,,,,,,,,,</p>
	<p>NEW,,20210414_MEOR-CSV- NW,MEOR,ZZZT1,20210414T115519.000508,OrderID_1000000822294,GOOG,,20210414T105519.000508,TR UE,FALSE,20210414T105519.000999,99999999:ZZZT1,88888888:ABCD1,F,route_110,,B,999999999.999 990,999999999999,4,LMT,DAY=20210414,PREPOST,FALSE,ISOI,DISQ=1000,FALSE,FALSE,ggcImuoZgm</p>
	<p>NEW,,20210316_MENQ-CSV- NW,MENQ,ZZZT1,20210414T115519.000508,QuoteID_1000000410263,GOOG,20210316T115519.000508,Quo</p>

CSV Submission	
	teID_10000000410264,20210316T105519.000508,54540005,99999999:ZZZT1,88888888:ABCD1,Rtd_QuoteID_10000000410263,FALSE,,,200,300,FrmDsgnID_1000,P,A,O,FALSE
Linkage Error Feedback File Content	<p>3501,RPR,14774075491883,20210414_MEOJ-CSV-NW,MEOJ,ZZZT1,20210414T105519.000508,OrderID_10000822283,GOOG,,,,,20210414T145519.000508,false,,C,,,,,,,,,,,,,</p> <p>3016,RPR,14774075491886,20210414_MEQR-CSV-NW,MEQR,ZZZT1,20210414T105519.000508,QuoteID_10000000410266,GOOG,Rcvd_QuoteID_134,20210414T105519.000508,54540006,99999999:ZZZT1,88888888:ABCD1,false,,,10.5,4,,,O,U,B,</p> <p>3501,RPR,14774075491891,20210414_MEOR-CSV-NW,MEOR,ZZZT1,20210414T115519.000508,OrderID_10000000822294,GOOG,,20210414T105519.000508,true,false,20210414T105519.000999,99999999:ZZZT1,88888888:ABCD1,F,route_110,,B,9999999999.99999,999999999999,4,LMT,DAY=20210414,PREPOST,false,ISOI,DISQ=1000,false,false,ggcImuoZgm</p> <p>3004,RPR,14774075491885,20210414_MEOA-CSV-NW-2,MEOA,ZZZT1,20210414T105519.000508,OrderID_106678,GOOG,20210414T115519.000509,false,false,,99999999:ZZZT1,88888888:ABCD1,F,RoutedID_01,,,false,O,B,29.5,500,300,LMT,DAY=20210414,POST,NA,DISQ=1000 STOP=9.99,false,AGENCY,,,,,,,,,,,,,</p> <p>3504,RPR,14774075491890,20210414_MENO-CSV-NW,MENO,ZZZT1,20210414T105519.000508,OrderID_10056002,GOOG,20210414T114519.000508,false,false,,,,DMA,,,SS,999.99,333,300,LMT,DAY=20210414,POST,DISQ=1000 STOP=9.99,false,abcd1278,F,true,ert549890,01235@20210414T092316.123456789@@,false,Y,,,,,,,,,,,,,</p> <p>3004,RPR,14774075491884,20210414_MEOA-CSV-NW,MEOA,ZZZT1,20210414T105519.000508,OrderID_106678,GOOG,20210414T115519.000508,false,false,,99999999:ZZZT1,88888888:ABCD1,F,RoutedID_01,,,false,O,B,29.5,500,300,LMT,DAY=20210414,POST,NA,DISQ=1000 STOP=9.99,false,AGENCY,,,,,,,,,,,,,</p> <p>3016,RPR,14774075491887,20210414_MEQR-CSV-NW-2,MEQR,ZZZT1,20210414T105519.000508,QuoteID_10000000410266,GOOG,Rcvd_QuoteID_134,20210414T105519.000508,54540008,99999999:ZZZT1,88888888:ABCD1,false,,,10.5,4,,,O,U,B,</p>

CSV Submission	
	<pre>3010,RPR,14774075491889,20210414_MEOT-CSV-NW- 2,MEOT,ZZZT1,20210414T115519.000508,TradeID_10000000888801,GOOG,20210414T105519.000509,fals e,,true,20210414T105519.000508,,,500,25.5,A,TapeTradeID_10000000999902,L,NA,,,,,,,,,,,,,</pre>
	<pre>3010,RPR,14774075491888,20210414_MEOT- CSV,MEOT,ZZZT1,20210414T115519.000508,TradeID_10000000888801,GOOG,20210414T105519.000508,fa lse,,true,20210414T105519.000508,,,500,25.5,A,TapeTradeID_10000000999901,L,NA,,,,,,,,,,,,,</pre>
	<pre>397,RPR,14774075491890,20210316_MENQ-CSV- NW,MENQ,ZZZT1,20210414T115519.000508,QuoteID_10000000410263,GOOG,20210316T115519.000508,Quo teID_10000000410264,20210316T105519.000508,54540005,99999999:ZZZT1,88888888:ABCD1,Rtd_Quote ID_10000000410263,FALSE,,,200,300,FrmDsgnID_1000,P,A,O,FALSE,</pre>