# Consolidated Audit Trail IM Tech Spec Updates Phase 2d - v4.0.0 r20

8/15/2023

### **IM Tech Spec Updates**

- Phase 2d v4.0.0 r20 (clean and redline) IM Tech Specs were published on 7/31/2023.
- 4.0.0 r20 Items associated with two releases: 2023 MEMX Options Exchange Release and 2023 Year-End Release:
  - MEMX Options Exchange Release-related Items:
    - Industry Test Release: 7/3/23
    - Production/Prod-Mirror Release: 9/11/23
  - Year-End Release-related Items:
    - Industry Test Release on 9/25/23.
    - Production/Prod-Mirror on 12/11/23.
- 4.0.0 r20 Items associated with the Electronic RFQ Responses Release:
  - Industry Test Release 2Q2024.
  - Production/Prod-Mirror Release 3Q2024.

# 2023 Industry Member Releases (Transaction) – Scope and Schedule

2023 – ADF Release

Spec Publication – 12/16/2022

Industry Test Release – 3/6/2023

Production/Production Mirror
Release – 3/27/2023

#### **Onboarding FINRA ADF**

- Add new event MENQS New Quote Supplement event
- Add new event MERQS Quote Route Supplement event
- Add representativeQuoteInd, askAggregatedOrders, and bidAggregatedOrders fields to MENQ event
- Add destinationType and session to MERQ event
- Change firmDesignatedID and accountHolderType fields on MENQ event from Required to Conditional
- Requirement update to optionally populate quantity=0 for CASH orders

2023 – Mid-Year Release
Spec Publication – 4/11/2023
Industry Test Release – 6/5/2023
Production/Production Mirror
Release – 7/24/2023

#### New handlingInstructions Validations

- Add a validation to restrict allowed paired Values for CASH, SWQ and SW handlingInstructions to be greater than 0
- Add a validation to restrict allowed paired Value for DISP handlingInstructions to be greater than or equal to 0

#### **Metadata File Removal Phase 2**

 Reject Metadata File submission at File Acknowledgement stage of processing 2023 – MEMX Options Exchange Release

Spec Publication – 7/31/2023
Industry Test Release – 7/3/2023
Production/Production Mirror
Release – 9/11/2023

#### New values for existing fields

 Add new 'MEMXOP' value for the following fields: destination, marketCenterID and senderIMID to support MEMX Options exchange.

<sup>\*</sup>Planned Industry Member Releases are subject to approval by the CAT NMS Plan Operating Committee.

# 2023 Industry Member Releases (Transaction) – Scope and Schedule

2023 – Report Card by Processing
Date Release

**Production Release – 11/15/2023** 

#### **Transaction Report Cards**

 Generate Report Cards by Processing Date starting with the Report Cards covering October 2023 2023 – Year-End Release
Spec Publication – 7/31/2023
Industry Test Release – 9/25/2023
Production/Production Mirror
Release – 12/11/2023

#### **New quantity Field Validations**

 Add a validation requiring quantity field value to be 0 for CASH orders

#### Electronic RFQ Responses (Included in July 2023 Spec Publication, but not deployed into Test or Production until 2024)

- Add new quote events to support reporting of RFQ responses for Options (MONQ, MORQ, MOQR, MOQM, and MOQC) and Multi-Leg (MLNQ, MLRQ, MLQS, MLQR, MLQC, and MLQM)
- Add new fields to equity quote events
  - RFQID to MENQ, MERQ, MEQR, MEQM, and MEQC
  - RFQFlag to MENQ and MEQR
  - relativePrice to MENQ, MERQ, MEQR, and MEQM
- Add new destinationType value of 'S'
- New Error Codes and Validations

# 2023 Industry Member Releases (Transaction) – Scope and Schedule

2023 – FDID Validation Report Card Release

Production Release – TBD – Not before the fourth quarter of 2023

#### **Transaction Report Cards**

 FDID Errors in Transaction Report Cards are not anticipated to be before the fourth quarter of 2023 2023 – FDID Validation to Production Release

Production/Production Mirror Release – TBD – Not before the fourth quarter of 2023

#### **CAIS-related validations & Statistics**

- Validate FDID against CAIS data
- Daily statistics reflecting FDID errors
- Provide a new linkage summary feedback file containing missing or invalid FDIDs

<sup>\*</sup>Planned Industry Member Releases are subject to approval by the CAT NMS Plan Operating Committee.

#### MEMX Options and Year-End Releases

- Two 2023 releases:
  - MEMX Options Exchange Release:
    - Industry Test Release: 7/3/23
    - Production/Production Mirror Release: 9/11/23
  - Year-End Release:
    - Industry Test Release on 9/25/23.
    - Production/Production Mirror on 12/11/23.

### New MEMEXOP Exchange

- Updated the Data Dictionary to add new 'MEMXOP' value for the destination, marketCenterID, and senderIMID fields to support onboarding MEMX Options Exchange.
  - Industry Test Release 7/3/2023
  - Production/Production Mirror Release 9/11/2023
- The Order and Quote Routing Field Mapping Between CAT and Exchanges/Display-Only Facility document was <u>updated</u> to include MEMX Options.

### New quantity Field Validation

- Added Error Code 2247 for Invalid combination of quantity and CASH handlingInstructions.
  - A quantity value of '0' must be reported for notional orders reported with the 'CASH' handlingInstructions value.
  - See <u>CAT FAQ D10</u>

### ADF-Related Updates

- The routedQuoteID field on the Routed Quote Supplement event (MERQS) was changed from conditional to required.
  - This event is applicable/required only when an Industry Member is generating quotes and displaying them on a Display-only Facility.

#### Manual Child Orders and Timestamps

- Addition of manualFlag and electronicTimestamp to all Child Order events (MECO, MECOM, MECOC, MOCO, MOCOM, MOCOC, MLCO, MLCOM, MLCOC).
  - The manualFlag is optional.
    - Requirements for populating this field may be expanded in future phases of CAT.
  - The electronicTimestamp is conditional, to be provided when the optional manualFlag is populated with value of 'true'.

### Other Updates

- Updated cancelQty definition to be consistent on all applicable events
- Updated Section 2.4.4.1 FLEX Percent Options Symbols clarifying the FLEXPCT options

#### Electronic RFQ Release

#### Electronic RFQ Responses

- Included in July 2023 Spec Publication, but not deployed into Test or Production until 2024
- This was included in 4.0.0 r20 and is grayed out to denote futureavailability.
- Specific dates for deployments to be Announced in 4Q2023
  - Industry Test Release 2Q2024.
  - Production/Prod-Mirror Release 3Q2024.

### **Electronic RFQ Updates**

- Beginning August 1, 2024, all RFQ responses that are communicated in standard electronic format directly to an Industry Member's OMS/EMS or to an RFQ platform and that are "not immediately actionable" (i.e., further action is required before a trade can be executed/routed), to the extent such responses are considered "orders" reportable pursuant to Rule 613(j)(8), will be required to be reported to CAT.
- On July 28, 2023, the SEC issued an order granting temporary exemptive relief from certain requirements in Section 6.4(d) of the CAT NMS Plan relating to the reporting of certain verbal floor activity and unstructured verbal and electronic upstairs activity. The relief expires on July 31, 2026.

### **Electronic RFQ Updates**

- ▶ To the extent a response to an RFQ is considered an order, reportable pursuant to Rule 613(j)(8) of Regulation NMS under the Exchange Act, the CAT NMS Plan and the Compliance Rules, Industry Members are required to report responses to RFQs as such:
  - New CAT quote events for options and multi-leg quotes are introduced to facilitate the reporting of electronic RFQ responses.
  - For equities, electronic RFQ responses will be reported via existing equity quote events with enhanced new fields and values.

#### **New Transaction Quote Events**

Consistent with existing Equity Quote events, eleven new Quote events have been added:

<b>Option Quotes Events</b>	Multi-Leg Quotes Events	
New Option Quote (MONQ)	New Multi-Leg Quote (MLNQ)	
Option Routed Quote (MORQ)	Multi-Leg Routed Quote (MLRQ)	
Option Quote Received (MOQR)	Multi-Leg Quote Supplement (MLQS)	
Option Quote Cancelled (MOQC)	Multi-Leg Quote Received (MLQR)	
Option Quote Modified (MOQM)	Multi-Leg Quote Cancelled (MLQC)	
	Multi-Leg Quote Modified (MLQM)	

#### New Fields to Existing Quote Events

- Added RFQID to MENQ, MERQ, MEQR, MEQM, and MEQC events for RFQ related quote events
- Added RFQFlag to MENQ and MEQR events to indicate the quote was originated in response to an electronic RFQ
- Added relativePrice to MENQ, MERQ, MEQR, and MEQM to indicate if the quote's pricing is expressed in benchmark or relative term (e.g., Peg, Offset)

### New Value to Existing Fields

- Added a value of 'S' for Quotes being routed to a U.S non-CAT reporting entity in the destinationType field
- Bifurcated the destinationType field into two sections:
  - Allowed Values for Quote Events
  - Allowed Values for Order Events

### Quote Linkage Keys

- Updated the Quote Key to include optionID and RFQID
- Updated the Quote Route Key to include optionID

Linkage Key	Description	Fields	
Quote Key	Links new quote events reported by the Industry Member to other related quote events.  For example, links a New Quote event to a related Routed Quote event.	<ul> <li>quoteKeyDate</li> <li>CATReporterIMID</li> <li>symbol/optionID</li> <li>quoteID</li> <li>RFQID</li> </ul>	
Quote Route Key	Links quote events reported by an Industry Member routing a quote and the Industry Member receiving the quote.	Responder  • Event Date  • senderIMID  • destination  • symbol/optionID  • routedQuoteID	<ul> <li>Solicitor</li> <li>Event Date</li> <li>senderIMID</li> <li>receiverIMID</li> <li>symbol/optionID</li> <li>receivedQuoteID</li> </ul>

#### **New Error Codes**

- Introduced new error codes to support the new RFQ related fields
  - 2248: Missing or Invalid RFQFlag
  - 2249: Missing or Invalid quotePriceType
  - 2250: Invalid relativePrice
  - 2251: Missing or Invalid RFQID
  - 2252: Invalid Combination of destinationType and RFQFlag

#### Added New Sections

- Section 5.1.10 Option Quotes
  - Section 5.1.10.1: New Option Quote Event
  - Section 5.1.10.2: Option Routed Quote Event
  - Section 5.1.10.3: Option Quote Received/Replaced Event
  - Section 5.1.10.4: Option Quote Cancelled Event
  - Section 5.1.10.5: Option Quote Modified Event
- Section 5.2.8 Multi-Leg Quotes
  - Section 5.2.8.1: New Multi-Leg Quote Event
  - Section 5.2.8.2: Multi-Leg Routed Quote Event
  - Section 5.2.8.3: Multi-Leg Quote Supplement Event
  - Section 5.2.8.4: Multi-Leg Quote Received/Replace Event
  - Section 5.2.8.5: Multi-Leg Quote Cancelled Event
  - Section 5.2.8.6: Multi-Leg Quote Modified Event

#### Updated Sections:

- Section 3.4.1: RFQ Scope to include RFQ Reporting requirements and Muti-Leg activities beginning August 1, 2024
- Section 4.10: Quotes and Section 4.10.1 through 4.10.7: Equity quote events to clarify that Quotes are also used to report quotes originated in NMS Securities for electronic RFQ responses.
- Section 4.10.1 through 4.10.7 of the Equity quote to indicate which fields are only applicable to IDQS and ADF flow.
- Added guidance in Sections 4.10.1 through 4.10.7 on populating the bidPrice/askPrice field is not required on events when relativePrice field is populated.
- Section 4.10.5 update to Quote Received/Replace Event.
- Section 7.5.1.4 Linkage Error Feedback to include reference to RFQ
   Platform

#### Updated Tables:

- Renamed and/or renumbered some Sections and Tables due to the addition of the new quote events
- Updated Table 5: Linkage Keys to include optionID and RFQID in the Quote
   Key
- Updated Table 7: Summary of Route and TRF Linkage to include RFQ route linkage keys
- Updated Table 60: Summary of Simple Option Events to include new MONQ, MORQ, MOQR, MOQM, MOQC quote events
- Updated Table 61: Summary of Multi-Leg Option Events to include new MLNQ, MLRQ, MLQR, MLQS, MLQC, and MLQM Multi-Leg quote events
- Renumbered Table 145 to Table 159: Linkage Errors Named on Unlinked
   IM Quote Event and added optionID to Sequence 6 (symbol)
- Renumbered Table 161 to Table 175: CAT Event Ingestion Error to add new RFQ field related error codes

- Updates to Appendix G: Data Dictionary:
  - Added new fields RFQID, RFQFlag, relativePrice, quotePriceType
  - Bifurcated destinationType into new sections covering Allowed Values for Quote Events and Allowed Values for Order Events
  - Updated type field to include:
    - MONQ New Option Quote
    - MORQ Option Routed Quote
    - MOQR Option Received Quote
    - MOQC Option Quote Cancelled
    - MOQM Option Quote Modified
    - MLNQ New Multi-Leg Quote
    - MLRQ Multi-Leg Routed Quote
    - MLQM Multi-Leg Quote Supplement
    - MLQR Multi-Leg Quote Received
    - MLQC Multi-Leg Quote Cancelled
    - MLQM Multi-Leg Quote Modified

- Update to Appendix F: Glossary
  - Added MONQ, MOQR, MLNQ, MLQR to the Primary Events
  - Added MORQ, MOQC, MLRQ, MLQC to the Secondary Events

#### FINRA CAT Helpdesk

Questions may be directed to the FINRA CAT Helpdesk at 888-696-3348 or <a href="mailto:help@finracat.com">help@finracat.com</a>

Q&A

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