

~~CAT Reporting Reference~~
~~Database Customer &~~
~~Account~~ Technical
Specifications for Industry
Members

38/2744/20265

Version 2.3.02.0-r4

Table of Contents

Preface	iv
Executive Summary	v
1. Introduction.....	1
1.1. CAT Overview.....	1
2. Reference Database Reporting Fundamentals.....	3
2.1. Key Data Elements.....	3
2.1.1. Firm Identifiers in File Submissions	3
2.2. Reference Data.....	4
2.2.1. Firm Designated ID (FDID).....	4
2.2.2. Large Trader ID (LTID) and Unidentified Large Trader ID (ULTID)	6
2.2.3. FDID Open Date	7
2.2.4. CAT Customer	7
2.2.5. Input Identifiers	7
2.2.5.1. U.S. Tax Identifiers	8
2.2.5.2. Foreign Identifiers	9
2.2.6. Transformed Identifier (TID).....	10
2.2.7. Customer ID	10
2.2.8. Customer Record ID.....	11
2.3. Reference Database Architecture	11
2.3.1. CCID Subsystem	11
2.3.2. Reference Data Subsystem.....	11
2.4. Data Types.....	15
2.4.1. Data Validation Based on Data Types.....	16
2.4.2. Required, Conditional, and Optional Fields	18
3. Special Reporting Requirements.....	20
3.1. Replacement of FDIDs.....	20
3.2. Replacement of Transformed Identifier (TID).....	20
3.3. Mass Transfer of FDIDs across Industry Members	23
3.4. Translation of Input Identifiers to TID Values	23
3.5. Translation of TID to CCID Values	24
3.6. Full Data Replacement Submission.....	25
3.7. Periodic Customer & Account Reference Data Refresh	26
3.7.1. JSON Example for FDID Refresh Report	30
3.8. Reporting Multiple Versions of a CAT Customer	30
3.9. Special Rules Regarding FDID Characters	32
3.10. Special Rules Regarding Natural Person CAT Customer Names.....	33

3.11. Special Rules Regarding Natural Person Authorized Traders	34
3.12. Special Rules for Clearing Firms	35
3.13. Special Rules for Addresses	36
4. Reference Database Reporting	37
4.1. Reference Data File.....	37
4.2. Transformed Identifiers File	64
5. Submission Process	70
5.1. File Submissions and Data Formats	70
5.1.1. File Submission Names	70
5.1.2. Submission Formats.....	72
5.1.3. Reference Data File Submission	72
5.1.3.1. Reference Data File Submission – FDID	73
5.1.3.2. Reference Data File Submission – CAT Customer	78
5.1.4. Transformed Identifiers File Submission	80
5.1.5. Paired Reference Data File and Transformed Identifiers File JSON Example .	81
5.1.6. Schema.....	86
5.1.6.1. Schema Version	86
5.1.6.2. Schema Definition	86
5.2. Connectivity	87
5.3. CAT Interface Methods.....	88
5.3.1. CAT File Transfer	89
5.3.2. Reference Database Reporter Portal	90
5.4. Reference Database Reporting Hours	91
5.4.1. Submission to the Reference Database	91
5.4.2. Deadline for Repair of Errors Identified by the Reference Database.....	92
5.5. Security.....	94
5.5.1. Encryption (In-transit).....	94
5.5.2. Encryption (At-rest).....	94
5.5.3. Authentication	94
6. Feedback and Corrections	95
6.1. File and Error Feedback.....	95
6.1.1. Feedback Generation for Reference Data and Transformed Identifiers Files .	97
6.1.2. Feedback Filenames and Format	98
6.1.3. JSON Examples of Feedback File for File Acknowledgement	105
6.2. File Integrity.....	106
6.2.1. JSON Examples for File Integrity Feedback.....	106
6.3. Data Validation	108

6.3.1.	JSON Examples for Data Validation Feedback	109
6.4.	Inconsistencies	112
6.4.1.	Material Inconsistencies Identification	113
6.4.2.	Outstanding Material Inconsistencies Feedback File	115
6.4.3.	JSON Example for Outstanding Material Inconsistencies Feedback	117
6.5.	Outstanding Rejections.....	118
6.5.1.	JSON Examples for Outstanding Rejections Metadata and Data Feedback..	122
6.6.	Repairs and Corrections	123
6.6.1.	File Integrity Errors	124
6.6.2.	Data Validation Errors.....	124
6.6.2.1.	Use of the <i>correctionList</i>	124
6.6.2.2.	Repair of Other Data Validation Errors	126
6.7.	FDID Reconciliation Report	128
7.	Testing.....	130
8.	Additional Information	131
8.1.	Public Website	131
Appendices		132
Appendix A: Change Release Management Process		133
Appendix B: Error Codes		134
B.1	File Integrity Errors	134
B.2	Data Validation Errors	136
B.3	Data Layer Validation Error Codes	148
B.4	Warning Error Codes	148
B.5	Inconsistency Codes	151
Appendix C: Glossary.....		154
Appendix D: Data Dictionary.....		156
Appendix E: Country and Region Codes.....		185

Preface

Rule 613 of the Securities Exchange Act of 1934 requires national securities exchanges and national securities associations (“SROs”) to submit a national market system plan to the Securities and Exchange Commission (“Commission” or “SEC”) to create, implement, and maintain a consolidated audit trail (the “CAT”) that would allow regulators to more efficiently and accurately track all activity in U.S. equity and listed options markets. Pursuant to Rule 613, the SROs filed with the Commission the National Market System Plan Governing the Consolidated Audit Trail (“CAT NMS Plan”), which was approved by the Commission on November 15, 2016.

Under Rule 613(g)(2), each member of a national securities exchange or national securities association is required to comply with all the provisions of the CAT NMS Plan. Relatedly, as mandated under Rule 613, the CAT NMS Plan requires each SRO to adopt rules requiring its members to comply with Rule 613 and the CAT NMS Plan, and to agree to enforce compliance by its members in that regard. Accordingly, each SRO has adopted rules requiring its members to comply with Rule 613 and the CAT NMS Plan. See, e.g., FINRA Rule 6800 Series.

The SROs jointly own Consolidated Audit Trail, LLC, which was formed by the SROs to arrange for and oversee the creation, implementation, and maintenance of the CAT as required under Rule 613. Thus, the CAT is a facility of each SRO.

~~This Customer and Account Technical Specification represents the second of the two-phase approach to Industry Member reporting of Customer and Account data, including the full Customer and Account information required under the CAT NMS Plan.~~

~~**Table 1: Industry Customer & Account Specifications Phased Approach**~~

LTID Phase Production — 12/2020 Compliance Dates: 4/26/2024—Equity—Large Industry Members 12/13/2021—2d—Options and Small Industry Members	Full Customer and Account Reporting Compliance Date: See CAT Alert 2022-01 and CAT Alert 2023-01
FDID, FDID Account Opening Date, LTID and LTID Effective Date	Remainder of Account information and all Customer information

Executive Summary

This document describes the requirements for the reporting of Customer and Account [reference](#) data to CAT by Industry Members, including detailed information about data elements and file submission. It also describes how Industry Members submit files to CAT, including access instructions, network and transport options, and testing requirements.

A separate companion document containing detailed reporting scenarios entitled [CAT Customer & Account Industry Member Reference Database Reporting Scenarios](#) should be used as a guide for determining how the field values laid out in this document must be applied when reporting various scenarios for Customer and Account [reference](#) data.

Note: All Transformed Identifiers (“TIDs”) included in the examples for Social Security Numbers, Individual Taxpayer Identification Numbers, or Employer Identification Numbers (collectively, ‘SSN/ITIN’ and ‘EIN’), are generated from values that are outside of the acceptable range of assignment by the assigning body and would fail CAT data validations if actually reported to [the Reference Database-CAIS](#).

Table 1: Revision / Change Process

Version	Date	Author	Description
DRAFT 1.0	12/13/2019	Consolidated Audit Trail, LLC	Initial draft
1.0	1/31/2020	Consolidated Audit Trail, LLC	Publication of initial version
1.1	4/17/2020	Consolidated Audit Trail, LLC	Addition of Boolean data type Addition of <i>fdidEndDateNULL</i> , <i>fdidEndReasonNULL</i> , <i>replacedByFDIDNULL</i> , <i>ltidEndDateNULL</i> , and <i>ltidEndReasonNULL</i> attributes Removal of ‘NULL’ acceptable values from <i>fdidEndDate</i> , <i>fdidEndReason</i> , <i>replacedByFDIDNULL</i> , <i>ltidEndDate</i> , and <i>ltidEndReason</i> attributes Addition of <i>failedCorrectionItems</i> array in Feedback file Modified guidance on nullifying previously populated attributes Modified submission and feedback examples to include additions/removals of attributes Modified schema field descriptions Replacement of CAT CAIS Reporter Portal with CAT Reporter Portal – CAIS Addition and modification of Error Codes Separation of Data Validation Warnings from Data Validation Errors Addition of Data Layer Validation Error Codes Addition of optional Group attribute for submission file names Replaced usage of Status with Feedback for feedback file

Version	Date	Author	Description
1.1.1	6/4/2020	Consolidated Audit Trail, LLC	<p>Inclusion of 'Entity ID' as example in FDID Definition</p> <p>Inclusion of 'ENTITY' as a valid FDID Type</p> <p>Correction of CAT CAIS Validation Warnings table Error Code numbering</p> <p>Clarification of 'Trading Day' as 'CAT Trading Day' and definition of 'CAT Trading Day'</p> <p>Explicit listing of 'false' as an acceptable value for Boolean attributes</p> <p>Inclusion of Error Code 22006 for duplicated <i>largeTraderID</i> within a single FDID Record submission</p>
1.1.2	12/02/2020	Consolidated Audit Trail, LLC	<p>Update to the Unsigned data type to be the same range as a 63-bit unsigned integer rather than a 64-bit unsigned integer</p> <p>Updated <i>firmDesignatedID</i> data type from Alphanumeric to Text to bring in line with Transaction reporting. Also results in changes to data type for <i>replacedByFDID</i> and <i>correctingFirmDesignatedID</i></p> <p>Modification of the Feedback File to include <i>submitterUserName</i> and remove <i>integrityErrorCode</i></p> <p>Renamed <i>rejectionID</i> within the <i>failedCorrectionItems</i> array to <i>failedRejectionID</i>, to clarify purpose</p>
DRAFT 2.0	6/30/2020	Consolidated Audit Trail, LLC	<p>Addition of Customer data, definitions, and reporting requirements</p> <p>Addition of separate Transformed Identifiers file</p> <p>Modified Feedback file to include Customer Data and Inconsistencies</p> <p>Expanded guidance for Reference Data File Submission</p> <p>Addition and modification of Error Codes</p> <p>Addition and modification of Data Layer Validation Error Codes</p> <p>Addition of Data Inconsistency Codes</p>
DRAFT 2.0 r1	12/01/2020	Consolidated Audit Trail, LLC	<p>Modifications to Schema</p> <p>Modification of Tax Identifier to Input Identifier terminology</p> <p>Addition of 'FOREIGN' Input Identifier type</p> <p>Modification of Update Confirmation to Update Notification</p> <p>Modifications to File Submission rules</p> <p>Inclusion of Mass Transfer of FDIDs across CAT Reporter Firms</p> <p>Inclusion of Full Data Replace Submission</p> <p>Addition of Country and Region Code reference lists</p>
DRAFT 2.0 r2	1/19/2021	Consolidated Audit Trail, LLC	<p>Updates to the Account Type and Customer Type attribute codes and definitions</p> <p>Changed approach from Delta Files with Delta Records to Delta Files with Full Records</p> <p>Split <i>role</i> value of 'HOLDER' to two versions – 'TRDHOLDER' and 'NTHOLDER', to reflect holders with trading and holders without trading authorization</p> <p>Removed 'NULL' paired fields as a result of the change to Delta Files with Full Records</p> <p>Updated examples based on schema changes</p> <p>Updated to detail actions to take if a Foreign TID Type/Foreign TID Country Code/TID Value is incorrectly reported as a Natural</p>

Version	Date	Author	Description
			<p>Person or Legal Entity, and needs to be reported as the other</p> <p>Added <i>customerRejectionEventID</i> to feedback file to provide a single consistent ID for Customer rejections</p> <p>Revised guidance for clearing LTID rejections</p> <p>Removed <i>correctingLargeTraderID</i> attribute from the Correction Actions list</p>
2.0	1/29/2021	Consolidated Audit Trail, LLC	<p>Modification to ULTID format validation</p> <p>Modifications to <i>accountType</i></p> <p>Removed <i>accountSubType</i></p> <p>Split <i>role</i> value of 'AUTHTRADER' to two versions – 'AUTHREP' and 'AUTH3RD' – to denote Authorized Traders who are, or are not, employees of the reporting firm</p> <p>Addition of <i>hasDiscretion</i> within <i>fdidCustomerList</i></p> <p>Modifications of Appendices B and D</p> <p>Denoted certain conditionally approved sections in italics, and included note regarding conditional approval</p>
2.0 r1	3/9/2021	Consolidated Audit Trail, LLC	<p>Removed note regarding conditional approval, and converted all previously italicized conditionally approved sections to plain text, following approval</p> <p>Corrected <i>priorCATReporterFDID</i> data type to Text, following change of FDID from Alphanumeric to Text</p> <p>Corrected JSON Object level for the <i>addressList</i> on the Natural Person and Legal Entity Customer Record entries</p> <p>Minor textual edits</p>
2.0 r2	5/7/2021	Consolidated Audit Trail, LLC	<p>Added <i>correspondentCRD</i> attribute to the Main JSON Object level, to enable firms to delineate Customer and Account data of their correspondent introducing brokers</p> <p>Changed reporting requirements to allow firms to report multiple versions of a single Customer within a single submission file, and added a Special Reporting Requirements section regarding Reporting Multiple Versions of a CAT Customer</p> <p>Removed Material and Minor Inconsistency checks against First Name and Last Name of a Natural Person CAT Customer</p> <p>Changed data type of <i>primeBrokerID</i>, <i>bankDepositoryID</i>, and <i>clearingBrokerID</i> to be Arrays rather than Alphanumeric, to allow firms to report more than one value for a single FDID Record</p> <p>Modifications to remove LTID date validation comparisons against FDID dates – retirement of Error Codes 22025, 22026, 22027, 23002, and 23003 (included originally in LTID Technical Specification revision)</p> <p>Moved <i>customerType</i> attribute from the FDID Record to the Customer Record</p> <p>Removed <i>customerType</i> value of 'OTHER' and replaced with 'NOTAPPLICABLE'</p> <p>Added detailed information regarding FDID character rules that have been added following the transition from alphanumeric to text</p> <p>Clarified file creation and versioning approach for Feedback files.</p> <p>Modified Feedback file schemas</p> <p>Updated data and feedback examples</p> <p>Modifications to Appendix B Error Codes</p>

Version	Date	Author	Description
2.0 r3	6/2/2021	Consolidated Audit Trail, LLC	<p>Added detail for Section 3.7 – Periodic Customer & Account Information Refresh for requirements on refreshing CAIS submission data</p> <p>Updated Section 5.3 – CAT Interface Methods – to include the Refresh feedback</p>
2.0 r4	8/24/2021	Consolidated Audit Trail, LLC	<p>Added <i>receiptTimestamp</i> and <i>completedTimestamp</i> attributes to TIDs Feedback File schema</p> <p>Removed <i>customerStartDate</i>, <i>customerEndDate</i>, and <i>customerEndReason</i> attributes</p> <p>Updated <i>branchOfficeCRD</i> attribute to be Conditional</p> <p>Increased maximum character length for the <i>accountName</i> and <i>legalName</i> attributes. Clarified Input Identifier reporting requirements in Section 2.2.5 – Input Identifiers</p> <p>Clarified <i>accountType</i> and <i>fdidType</i> reporting requirements in Section 5.1.3 – Reference Data File Submission</p> <p>Updated definitions of <i>primeBrokerID</i> and <i>bankDepositoryID</i> to remove mention of custodian types</p> <p>Added <i>catSubmitterID</i> attribute to Nightly Inconsistencies Feedback File name structure</p> <p>Updated definitions of 'ACCREDITED', 'EMPLOYEE', 'OTHBKR' and 'ADVISER' <i>customerType</i> values</p> <p>Added terminal submission states INCOMPLETE_PROCESSING_FAILURE and COMPLETED_FILE_TIMEOUT</p> <p>Updated guidance and validations for appropriate <i>foreignTIDType</i> values for Natural Person or Legal Entity CAT Customers</p> <p>Added <i>doingBusinessAs</i> attribute</p> <p>Updated data and feedback examples</p> <p>Modified Appendix B Error Codes</p> <p>Modified Appendix E Region and Postal Code values to only be applicable for US and CA country values</p>
2.0 r5	10/8/2021	Consolidated Audit Trail, LLC	<p>Addition of Extended Text data type</p> <p>Updated <i>doingBusinessAs</i> attribute to be Conditional</p> <p>Updated <i>fdidCustomerList</i> attribute to be Conditional</p> <p>Updated <i>registeredRepCRD</i> attribute to be Optional</p> <p>Corrected format of <i>regionCode</i> for US and Canada Addresses to AA-XX</p> <p>Updated definition of 'AVERAGE' <i>accountType</i> value</p> <p>Updated definition of <i>doingBusinessAs</i> attribute</p> <p>Updated definition of <i>branchOfficeCRD</i> attribute</p> <p>Clarified FDID definition in Section 2.2.1 – Firm Designated ID</p> <p>Added reporting guidance for Correspondent firms' Accounts in Section 2.1.1 – Firm Identifiers in File Submissions</p> <p>Clarified reporting guidance for 'FOREIGN' Input Identifiers in Section 2.2.5 – Material Inconsistencies Procedures</p> <p>Addition of Sections 2.2.13 – Material Inconsistency Obligations for Triggering Firms and 2.2.14 – Material Inconsistency Obligations for Impacted Firms</p> <p>Clarified reporting guidance for replacement and transfers of FDIDs in Section 3 – Special Reporting Requirements</p>

Version	Date	Author	Description
			<p>Modified reporting guidance for 'RELATIONSHIP' and 'ENTITYID' FDIDs in Section 5.1.3 – Reference Data File Submission</p> <p>Modified reporting guidance for 'EMPLOYEE', 'BD', and 'RIC' <i>customerType</i> values in Section 5.1.3 – Reference Data File Submission</p> <p>Added reporting guidance for <i>branchOfficeCRD</i> and <i>registeredRepCRD</i> for clearing firms and institutional customers in Section 5.1.3 – Reference Data File Submission</p> <p>Added reporting guidance for CAT Customers with trading discretion to Section 5.1.3 – Reference Data File Submission</p> <p>Addition of Account, Legal Entity, and Natural Person definitions in Appendix C</p> <p>Modified JSON example schemas</p> <p>Modified Appendix B error codes</p> <p>Corrected <i>customerType</i> value of 'ADVISER' for Legal Entity Customer Record</p>
2.0 r6	12/17/2021	Consolidated Audit Trail, LLC	<p>Modified Executive Summary</p> <p>Added 'DRIVERLICENSE' <i>foreignTIDType</i> value</p> <p>Added 'AE', 'AA', and 'AP' as valid United States <i>regionCode</i> values for Military and Diplomatic addresses in Appendix E</p> <p>Added specific Go Live dates to Table 1</p> <p>Added guidance on 'FOR' <i>primeBrokerID</i> or <i>bankDepositoryID</i> value in Section 5.1.3.1 – Reference Data File Submission – FDID and attribute definitions</p> <p>Added guidance for reporting of 'BROKERAGE' <i>accountType</i> value in Section 5.1.3 – Reference Data File Submission</p> <p>Updated <i>registeredRepCRD</i> attribute definition</p> <p>Updated 2.2.13 and 2.2.14 regarding Material Inconsistency Obligations</p> <p>Updated 'EMPLOYEE' and 'ADVISER' <i>customerType</i> value definitions</p> <p>Updated 'BROKERAGE' <i>accountType</i> value definition</p> <p>Clarified Input Identifier guidance and formats, and updated validations for EINs used as Input Identifiers in Section 2.2.5 – Input Identifiers</p> <p>Updated guidance for EINs in Section 3.3 Translation of Input Identifiers to TID Values</p> <p>Added hash examples to Section 5.1 – File Submissions and Data Formats</p> <p>Added guidance for an Industry Member that stores single name value for a Customer Record in Section 5.1.3 – Reference Data File Submission</p> <p>Added reporting guidance for Military and Diplomatic addresses in Section 5.1.3 – Reference Data File Submission</p> <p>Clarified reporting of <i>registeredRepCRD</i> attribute in Section 5.1.3.1 – Reference Data File Submission – FDID</p> <p>Clarified submission inconsistency feedback files in Section 6.4 – Submission Inconsistencies</p> <p>Clarified current Minor Inconsistencies in Section 2.2.11 – Data Inconsistency</p> <p>Clarified current Material Inconsistencies in Table 3</p>

Version	Date	Author	Description
			<p>Clarified 'ENDED' <i>roleEndReason</i> value definition</p> <p>Corrected <i>firmDesignatedID</i> and <i>accountName</i> attribute definitions</p> <p>Corrected Firm Designated ID definition in Appendix C – Glossary</p> <p>Corrected Extended Text field data types in Data Dictionary to match CAIS Data File section</p> <p>Modified JSON example schemas</p> <p>Removed error codes 21015 (Paired Identifiers File has Integrity Error) and 21515 (Paired Data File has Integrity Error)</p> <p>Added error codes 21020 (Automated transfer in progress), 22539 (CAT Customer Record has an unresolved inconsistency), and 22540 (Invalid middleName)</p> <p>Modified error codes 22535 (Legal Entity CAT Customer reported with improper foreignTIDType) and 24005 (Improper correction attempt)</p> <p>Replaced instances of “firm” with “Industry Member” throughout document</p>
2.0 r7	3/9/2022	Consolidated Audit Trail, LLC	<p>Added <i>DVPCustodianID</i> attribute</p> <p>Removed <i>primeBrokerID</i> and <i>bankDepositoryID</i> attributes</p> <p>Added Section 6.6 – FDID Version Report</p> <p>Added 'INACTIVE' as an acceptable value for <i>fdidEndReason</i>, <i>ltidEndReason</i>, and <i>roleEndReason</i> attributes</p> <p>Removed 'CP' and 'OTHBKR' as acceptable values for <i>customerType</i> for Legal Entity CAT Customers</p> <p>Removed 'BROKERAGE' and 'ADVISED' as acceptable values for the <i>accountType</i> attribute</p> <p>Updated definition of 'OTHER' <i>accountType</i> value</p> <p>Updated definition of 'ADVISER' <i>customerType</i> value for Legal Entity CAT Customers</p> <p>Added Table 3 to illustrate inconsistency timeline</p> <p>Clarified LTID attribute in Full CAIS in Section 2.2.2 – Large Trader ID and Unidentified Large Trader ID</p> <p>Added reference to FAQ Q57 in Section 2.2.6 – Transformed Identifier (TID)</p> <p>Clarified acceptable use of 'NNVE' value in Section 5.1.3.2 – Reference Data File Submission – Customer</p> <p>Clarified inconsistency grace period in Sections 2.2.13 – Material Inconsistency Obligations for Triggering Firms and 2.2.14 – Material Inconsistency Obligations for Impacted Firms</p> <p>Clarified definition of <i>clearingBrokerID</i>, <i>statusHistory</i>, and <i>submissionStatus</i> attributes</p> <p>Replaced <i>rejectionID</i> attribute with <i>warningID</i> attribute for TIDs Feedback Files</p> <p>Updated data type of <i>submissionID</i> in TIDs Feedback File</p> <p>Corrected references of <i>tidRecordID</i> to <i>customerRecordID</i></p> <p>Corrected references of <i>correctionsList</i> to <i>correctionList</i></p> <p>Removal of error codes 22051 (Neither <i>primeBrokerID</i> nor <i>bankDepositoryID</i> populated), 22062 (Invalid <i>primeBrokerID</i>), and 22063 (Invalid <i>bankDepositoryID</i>)</p> <p>Clarified definitions of error codes 22529 (Customer Record</p>

Version	Date	Author	Description
			<p>rejected because another version of the customer was rejected), 22533 (Multiple instances of Customer with differing data) and 22526 (<i>customerRecordID</i> not present in paired Identifiers file); and clarified definition and description of error code 22042 (Multiple active roles for within <i>fdidCustomerList</i>).</p> <p>Addition of error code 22075 (Missing or Invalid DVPCustodianID)</p>
2.0 r8	4/8/2022	Consolidated Audit Trail	<p>Added <i>foreignTIDType</i> value of 'OTHGOVT'</p> <p>Clarified Sections 2.2.11 through 2.2.15 regarding Data Inconsistencies</p> <p>Moved the Customer Data Inconsistencies table to Section 2.2.1 and the Triggered Inconsistencies and Impacted Inconsistencies tables to Section 2.2.15</p> <p>Updated Customer Data Inconsistencies table to include additional information on when a Material Inconsistency for the <i>tidType</i> attribute would be triggered</p> <p>Updated Section 2.2.1 – Firm Designated ID (FDID) example for Entity ID</p> <p>Updated Section 2.2.5 – Input Identifiers to include 'OTHGOVT' on the hierarchy of Foreign Input Identifiers, added language regarding CAT NMS Plan requirements and clarified guidance when an Input Identifier for a Customer changes</p> <p>Updated Section 2.3 –Data Types to include detail that NUMBER JSON type fields having leading zero characters are not valid JSON and will result in a file integrity error</p> <p>Added Section 3.2 – Replacement of Transformed Identifier (TID) and addition of such information where applicable</p> <p>Clarified Section 3.6 – Transition from LTID to Full Customer Reporting regarding the differences between LTID Phase and Full CAIS Phase</p> <p>Revised Section 3.7 – Full Data Replacement</p> <p>Clarified Section 3.8 – Periodic Customer & Account Information Refresh</p> <p>Added Section 3.12 – Special Rules Regarding Natural Person Customer Names and addition of such information where applicable</p> <p>Added Section 3.13 – Special Rules Regarding Natural Person Authorized Traders</p> <p>Added <i>authTraderNamesList</i> multi-dimensional array to the FDID Record in Section 4.1 – CAIS Data File</p> <p>Updated Elements of an Identifiers Feedback File Table in Section 6.1.2 – Feedback File Names and Format to include <i>submissionStatus</i> of RECORD_SCAN_COMPLETED</p> <p>Updated Sections 6.6 – FDID Version Report with report formatting, example and sentinel file information</p> <p>Added Section 6.6.1 – JSON Examples for FDID Version Report</p> <p>Updated value descriptions:</p> <ul style="list-style-type: none"> • 'ENTITYID' (<i>accountType, fdidType</i>) • 'CP' (<i>customerType</i>) • AUTH3RD and AUTHREP (<i>role</i>) • 'NATIONALID' (<i>foreignTIDType</i>). <p>Updated attribute descriptions:</p>

Version	Date	Author	Description
			<ul style="list-style-type: none"> • <i>DVPCustodianID</i> (to align with the Transaction Technical Specification description) • <i>firstName</i> • <i>clearingBrokerID</i> • <i>replacedByTID</i> • <i>replacingForeignTIDType</i> • <i>foreignTIDType</i>. <p>Reordered the allowable values for <i>foreignTIDType</i> to align with the hierarchy outlined in Section 2.2.5 – Input Identifiers</p> <p>Updated Data Type for <i>lastSubmittedRecordID</i> in Nightly Inconsistencies Feedback File to Array [Unsigned] to support submission of multiple Customer versions</p> <p>Reverted <i>warningID</i> back to <i>rejectionID</i> in Identifiers Feedback File and updated <i>rejectionID</i> to be Conditional, and made conforming changes to schema where applicable in Section 6.2.1 – JSON Examples for File Integrity Feedback and Section 6.3.1 – JSON Examples for Data Ingestion Feedback</p> <p>Clarified Rules in Sections 5.1.3.1 – Reference Data File – FDID and 5.1.3.2 – Reference Data File Submission – Customer:</p> <ul style="list-style-type: none"> • Rule 25 in Section 5.1.3.1 regarding scenarios where it is not permissible to implicitly end a Customer-to-FDID association • Rule 30 in Section 5.1.3.1 regarding populating the <i>DVPCustodianID</i> attribute when there is no clearing number or DTC number available • Rule 33 in Section 5.1.3.1 regarding how to report a change in <i>role</i> • Rule 36 in Section 5.1.3.1 and Rule 14 in Section 5.1.3.2 regarding Address Records for United States Military or Diplomatic addresses <p>Added Rules in Sections 5.1.3.1 – Reference Data File – FDID and 5.1.3.2 – Reference Data File Submission – Customer:</p> <ul style="list-style-type: none"> • Rule 28 in Section 5.1.3.1 and Rule 10 in Section 5.1.3.2 regarding address lines for FDID and Customer addresses • Rule 37 to Section 5.1.3.1 regarding <i>fdidDate</i> for an FDID that was closed and then reopened • Rule 15 to Section 5.1.3.2 regarding unparsed Natural Person Customer names <p>Clarified Rule 1 in Section 7 – Nightly Data Inconsistencies Feedback to clarify sentinel file posting</p> <p>Updated Error Codes: 21011, 22042, 22057, 22527, 24904, 24908 and 24911</p> <p>Updated previously reserved Error Codes 22072, 22073 and 22074 based on addition of <i>authTraderNamesList</i> to the FDID Record</p> <p>Added Error Codes: 22541 and 22542</p> <p>Added corresponding Error Codes to CAT CAIS Identifiers File Validation Warnings Table</p> <p>Added terms to the Appendix C: Glossary:</p> <ul style="list-style-type: none"> • Authorized Trader

Version	Date	Author	Description
			<ul style="list-style-type: none"> • CAT Customer • Discretion • Input Identifier • CAT NMS Plan-Defined PII • Sensitive Identifier <p>Replaced formal field names with the JSON attribute (for example, Update Notification with <i>updateNotification</i>)</p> <p>Correction of minor typos throughout</p> <p>Included applicable reference data references to Appendix E</p>
2.0 r9	5/4/2022	Consolidated Audit Trail	<p>Added clarification to Section 3.13 – Special Rules Regarding Natural Person Authorized Traders</p> <p>Added the <i>hasDiscretion</i> field, where required, to the example in Section 5.1.5 –Paired CAIS Data and Transformed Identifiers File JSON Example</p> <p>Updated value descriptions:</p> <ul style="list-style-type: none"> • 'MARKET' (<i>accountType</i>) • 'AUTH3RD' (<i>role</i>) • 'AUTHREP' (<i>role</i>)
2.0 r9.1	5/5/2022	Consolidated Audit Trail	Added clarification to Section 2.2.5 – Input Identifiers
2.0 r9.2	9/20/2022	Consolidated Audit Trail	<p>Corrected maximum uncompressed size from 100GB to 7GB for files submitted through SFTP:</p> <ul style="list-style-type: none"> • Section 5.1.3, Rule 10 • Removal of Error Codes 21005 (File exceeds the supported size limit) and 21505 (File exceeds the supported size limit)
2.0 r10	08/02/2023	Consolidated Audit Trail	<p>Added additional details and clarifications to Section 1– Introduction; Section 2 – CAT Customer & Account Reporting Fundamentals; Section 3 – Special Reporting Requirements; Section 4 –CAIS Reporting; Section 5 – Submission Process; Section 6 – Feedback and Corrections; and Section 7 – Impacted Inconsistencies Feedback</p> <p>Bifurcated Section 2.2.5 into new Sections: 2.2.5.1 – U.S. Tax Identifiers and 2.2.5.2 – Foreign Identifiers</p> <p>Added new Section 2.2.8 – Customer Record ID</p> <p>Moved Sections 2.2.8 – CCID Subsystem and 2.2.9 – CAIS Data Subsystem out of Section 2.2 – Reference Data and into new Section 2.3 – CAT CAIS Architecture</p> <p>Removed Section 2.2.10 – Reportable Identifier and marked data required to be reported in plaintext in the appropriate sections</p> <p>Moved Section 2.2.11 – Data Inconsistency out of Section 2.2 – Reference Data into new Section 2.4 – Data Inconsistency</p> <p>Deleted Table 3: Customer Data Inconsistencies and moved relevant information to the appropriate sections</p> <p>Renamed and renumbered Section 2.2.15 from “Notification of Customer Record Updates” to Section 2.4.4 “Proactive Updates of Customer Record”</p> <p>Moved Table 4: Triggered Inconsistencies and Table 5: Impacted Inconsistencies to Section 5.4.3 – Deadline for</p>

Version	Date	Author	Description
			<p>Resolving Inconsistencies Identified by CAT CAIS</p> <p>Added a note to the Extended Text Data Type in Table 3: Data Types</p> <p>Renamed Section 3.3 from “Mass Transfer of FDIDs across CAT Reporter Firms” to “Mass Transfer of FDIDs across Industry Members”</p> <p>Removed references to the “Automated Transfer Procedure” from Section 3.3 – Mass Transfer of FDIDs across Industry Members</p> <p>Temporarily removed examples from Table 5: Periodic Refresh Examples</p> <p>Added new Section 3.14 – Special Rules for Clearing Firms</p> <p>Updated field Descriptions in Table 6, Table 7, Table 8, Table 20, Table 21, Table 22 and Table 23:</p> <ul style="list-style-type: none"> • For Table 6, to note that at least one Customer address is required • For consistency with other guidance throughout the document • To detail, for Conditional fields, when the field is required and when it is not required • To provide other additional clarifications <p>Updated Appendix D to conform with changes in Tables 6 and 7</p> <p>Added that repair of Error Code 22526 requires use of the <i>correctionList</i></p> <p>Added Rule 6 to Section 5.1.1 – File Submission Names</p> <p>Renamed Section 5.1.3 from “Reference Data File Submission” to “CAIS Data File Submission”</p> <p>Renamed Section 5.1.3.1 from “Reference Data File Submission – FDID” to “CAIS Data File Submission – FDID”</p> <p>Renamed Section 5.1.3.2 from “Reference Data File Submission – Customer” to “CAIS Data File Submission – Customer”</p> <p>Clarified Rule 1, Rule 24, Rule 30 and Rule 33 in Section 5.1.3.1 – CAIS Data File Submission – FDID</p> <p>Added Rule 38 to Section 5.1.3.1 – CAIS Data File Submission – FDID</p> <p>Added new Rule 15 and Rule 16 to Section 5.1.3.2 – CAIS Data File Submission – Customer</p> <p>Renamed Section 5.1.4 from “Identifiers File Submission” to “Transformed Identifiers File Submission”</p> <p>Added Rule 9 to Section 5.1.4 – Transformed Identifiers File Submission</p> <p>Renamed Section 5.1.5 from “Paired CAIS Data and Transformed Identifiers File JSON Example” to “Paired CAIS Data File and Transformed Identifiers File JSON Example”</p> <p>Revised the narrative and field values and added Customer addresses in the JSON examples in Section 5.1.5 – Paired CAIS Data File and Transformed Identifiers File JSON Example</p> <p>Renamed Section 5.4.2 from “Deadline of Repair for Errors Identified by CAT CAIS” to “Deadline for Repair of Errors Identified by CAT CAIS”</p> <p>Added Table 13: Error Repair Deadline Examples</p> <p>Renamed Section 5.4.3 from “Deadline of Repair of Data</p>

Version	Date	Author	Description
			<p>Inconsistencies or Confirmation of Data Accuracy Identified by CAT CAIS” to “Deadline for Resolving Inconsistencies Identified by CAT CAIS”</p> <p>Added Table 17: CAIS Data Feedback File Versions, Table 18: Transformed Identifiers Feedback File Versions; and Table 19: Triggered Inconsistencies Feedback File Version</p> <p>Retitled Table 20 from “Elements of a Data Feedback File” to “Elements of a CAIS Data Feedback File”</p> <p>Clarified the following in Table 20:</p> <ul style="list-style-type: none"> • <i>customerRejectionEventID</i> is a Data Type of Text (100) • <i>customerRecordID</i> is a Data Type of Array of Unsigned Values • <i>addrType</i> is a Data Type of Choice <p>Retitled Table 21 from “Elements of an Identifiers Feedback file” to “Elements of a Transformed Identifiers Feedback File”</p> <p>Clarified the following in Table 21:</p> <ul style="list-style-type: none"> • <i>customerRecordID</i> is a Data Type of Array of Unsigned Values <p>Clarified that <i>rejectionID</i> is always set to ‘null’ in Table 21: Elements of a Transformed Identifiers Feedback File</p> <p>Renamed Section 6.1.2 from “Feedback File Names and Format” to “Feedback Filenames and Format”</p> <p>Clarified the following in Table 22:</p> <ul style="list-style-type: none"> • <i>customerRecordID</i> is a Data Type of Array of Unsigned Values • <i>updateNotifications</i> is on the Main JSON Object <p>Renamed Section 6.3 from “Data Ingestion” to “Data Validation”</p> <p>Renamed Section 6.3.1 from “JSON Examples for Data Ingestion Feedback” to “JSON Examples for Data Validation Feedback”</p> <p>Renamed Section 6.5 from “Corrections” to “Repairs and Corrections”</p> <p>Renamed Section 6.5.2.1 from “Missing or Invalid <i>firmDesignatedID</i> and Malformed TID Records” to “Repair or Deletion for Failing FDID or TID Format Validation or Failure to Pair <i>customerRecordID</i>”</p> <p>Renamed Section 6.5.2.2 from “Data Validation Errors” to “Repair of Other Data Validation Errors”</p> <p>Updated the JSON examples in Section 6 – Feedback and Corrections and Section 7 – Impacted Inconsistencies Feedback</p> <p>Added a new JSON example in Section 6 – Feedback and Corrections to illustrate a “v4” feedback file</p> <p>Removed the compression type from sentinel file examples</p> <p>Added Section 6.7 – FDID Reconciliation Report</p> <p>Bifurcated Rule 1 into Rule 1 and Rule 2 in Section 7 – Impacted Inconsistencies Feedback</p> <p>Added Rule 3 and Rule 7 to Section 7 – Impacted Inconsistencies Feedback</p> <p>Deleted Rule 8 from Section 7 – Impacted Inconsistencies Feedback</p> <p>Renamed Section 7.1.1 from “Data Inconsistencies Feedback</p>

Version	Date	Author	Description
			<p>File Names” to “Impacted Inconsistencies Feedback Filenames”</p> <p>Renamed Section 7.1.2 from “JSON Examples for Data Inconsistencies Feedback” to “JSON Example for Impacted Inconsistencies Feedback”</p> <p>Deleted Rule 3 and Table 20 from Section 7.1.1 – Data Inconsistencies Feedback File Names</p> <p>Renamed Table 23 from “Elements of an Inconsistency Feedback file” to “Elements of an Impacted Inconsistencies Feedback File”</p> <p>Clarified in Table 23: Elements of an Impacted Inconsistencies Feedback File that <i>inconsistencyList</i>, <i>inconsistencyDeadline</i> and <i>materialInconsistencies</i> are Required fields</p> <p>Renamed Table 24 from “Data File Integrity Errors” to “CAIS Data File Integrity Errors”</p> <p>Renamed Table 25 from “Identifiers File Integrity Errors” to “Transformed Identifiers File Integrity Errors”</p> <p>Renamed Table 28 from “CAT CAIS Data File Validation Warnings” to “CAIS Data File Validation Warnings”</p> <p>Renamed Table 29 from “CAT CAIS Transformed Identifiers File Validation Warnings” to “Transformed Identifiers File Validation Warnings”</p> <p>Clarified Error Code Descriptions and Explanations in Appendix B</p> <p>Removed Error Codes 21020, 22066 and 22070</p> <p>Added Error Codes 22076 and 22077</p> <p>Clarified the corresponding CAIS Data File Error Code for Warning Code 24904</p> <p>Added Warning Codes 24008 and 24917</p> <p>Renumbered duplicated Appendix B.4 to B.5</p> <p>Revised Full CAIS Compliance dates and Release dates throughout</p> <p>Removed references to expired or temporary guidance</p> <p>Conformed terminology such that</p> <ul style="list-style-type: none"> • “CAT Reporter”, “CAT Reporter Firm”, etc. is now “Industry Member”, where applicable • “attribute” is now “field”, where applicable • (1) rejections are “repaired”; (2) self-identified errors are “corrected”; and (3) inconsistencies are “resolved” (either by “confirming” or “updating”) • “Data file”, “Reference Data file”, etc. is now “CAIS Data File” • “TIDs file”, “Identifiers file”, etc. is now “Transformed Identifiers File” • “Inconsistency Feedback- Submission” is now “Triggered Inconsistencies Feedback” • “Inconsistency Feedback- Scans” is now “Impacted Inconsistencies Feedback” • “CAIS Reporter Portal”, “CAT Reporter Portal”, etc. is now “CAT Reporter Portal – CAIS” • “Data ingestion” is now “Data Validation” <p>Updated the field concepts to the field name (for example, from</p>

Version	Date	Author	Description
			<p>“FDID” to “<i>firmDesignatedID</i>”)</p> <p>Added references to guidance in published FAQs, where applicable</p> <p>Renumbered Tables and Sections, where applicable</p> <p>Corrected minor typos throughout</p>
2.1	12/21/2023	Consolidated Audit Trail	<p>Removed Section 2.4.1 – Material Inconsistencies Procedure, Section 2.4.2 – Material Inconsistency Obligations for Triggering Firm, Section 2.4.3 – Material Inconsistency Obligations for Impacted Firm, and Section 2.4.4 – Proactive Updates of Customer Record, and moved relevant information to the appropriate sections</p> <p>Updated Rule 15 in Section 5.1.3 – CAIS Data File Submission – Customer</p> <p>Updated Section 5.3.1 – CAT File Transfer</p> <p>Updated Section 5.4.3 – Deadline for Resolving Inconsistencies Identified by CAT CAIS</p> <p>Renamed and updated Table 14 from “Triggered Inconsistencies” to “Inconsistencies”</p> <p>Removed Table 15: Impacted Inconsistencies</p> <p>Updated Section 6 – Feedback and Corrections</p> <p>Updated Section 6.1 – File and Error Feedback to remove references to “Triggered” and “Impacted” inconsistencies</p> <p>Updated Table 15: Feedback and Error Correction Availability</p> <p>Removed Table 19: Triggered Inconsistencies Feedback File Versions</p> <p>Renamed Section 6.1.1 from “Feedback Generation” to “Feedback Generation for CAIS Data and Transformed Identifiers Files”</p> <p>Removed Table 22: Elements of a Triggered Inconsistencies Feedback File</p> <p>Updated Section 6.3 – Data Validation to remove references to inconsistencies and moved Rule 8 to Section 6.4.2</p> <p>Updated <i>customerRecordID</i> in JSON feedback examples</p> <p>Repurposed Section 6.4 from “Triggered Inconsistencies” to “Inconsistencies”</p> <p>Added new Sections 6.4.1 – Material Inconsistencies Identification, Section 6.4.2 – Outstanding Material Inconsistencies Feedback File, Section 6.4.3 – JSON Example for Outstanding Material Inconsistencies Feedback</p> <p>Added new Table 20: Elements of an Outstanding Material Inconsistencies Metadata Feedback File and Table 21: Elements of an Outstanding Material Inconsistencies Data Feedback File</p> <p>Added new Section 6.5 – Outstanding Rejections and Section 6.5.1 JSON Examples for Outstanding Rejections Metadata and Data Feedback</p> <p>Added new Table 22: Elements of an Outstanding Rejections Metadata Feedback File and Table 23: Elements of an Outstanding Rejections Data Feedback File</p> <p>Updated and renamed Section 6.6 from “Repairs and Corrections” to “Repairs, Corrections and Resolutions”</p> <p>Updated Section 6.6.2 – Data Validation Errors</p> <p>Updated and renamed Section 6.6.2.1 from “Repair or Deletion</p>

Version	Date	Author	Description
			<p>for Failing FDID or TID Format Validation or Failure to Pair customerRecordID” to “Use of the correctionList”</p> <p>Added that repair of Error Codes 22914 and 22501 requires use of the <i>correctionList</i></p> <p>Added new Section 6.6.3 – Material Inconsistencies and Section 6.6.4 – Proactive Updates of Customer Record</p> <p>Removed Section 6.6 – FDID Version Report</p> <p>Removed Section 7 – Impacted Inconsistencies Feedback</p> <p>Updated Error Codes 22503, 22525, 22534, 22535, 22541 and 22542 in Appendix B.2</p> <p>Updated Appendix B.5</p> <p>Updated Appendix D to conform with changes in Table 6</p> <p>Renumbered sections, rules and tables as appropriate</p> <p>Added references to updated guidance throughout</p> <p>Removed references to expired or temporary guidance</p>
2.1.0 r1	1/03/2024	Consolidated Audit Trail	Updated “fileName” to “submissionFilename” in Table 21, Table 23, and in the file example in Section 6.4.3
2.1.0 r2	1/26/2024	Consolidated Audit Trail	<p>Updated “<i>InconsistencyDeadline</i>” to “<i>inconsistencyDeadline</i>” in Table 21</p> <p>Updated “<i>fdidRejection</i>” to “<i>FDIDRejection</i>” and “<i>customerRejection</i>” to “<i>CustomerRejection</i>” in Table 23 and the feedback examples</p> <p>Corrected typos in the Outstanding Rejections and Material Inconsistencies Feedback JSON examples</p> <p>Updated “<i>errorFeedBackFilename</i>” to “<i>errorFeedbackFileName</i>” in Table 20, Table 22 and the feedback examples</p>
2.1.0 r3	3/08/2024	Consolidated Audit Trail	<p>Added examples to Table 5: Periodic Refresh Examples</p> <p>Extended the Data Type for the Field Name <i>File Kind</i> in Table 8 from Alphanumeric (20) to Alphanumeric (30)</p> <p>Clarified Rule 27 in Section 5.1.3.1 – CAIS Data File Submission – FDID and Rule 9 in Section 5.1.3.2 – CAIS Data File Submission – Customer</p> <p>Added additional guidance to Section 5.4.1 – Submission of CAT Account and Customer Data</p> <p>Updated Table 16: CAIS Data Feedback File Versions and the narrative above to conform to a system change</p> <p>Updated Section 6.1.1 – Feedback Generation for CAIS Data and Transformed Identifiers Files</p> <p>Clarified Rule 1 in Section 6.4.1 – Material Inconsistencies Identification</p> <p>Updated Section 6.5 – Outstanding Rejections</p> <p>Added clarifications to Section 6.6.2.1 – Use of the correctionList</p> <p>Removed Error Code 21018</p> <p>Updated Error Codes 22503 and 22525</p> <p>Updated the Corresponding Data Validation Error Code for Warning Code 24917</p> <p>Added Warning Code 24009</p> <p>Removed references to expired or temporary guidance</p> <p>Changed “intra-firm” and “inter-firm” to “intrafirm” and “interfirm” to conform with the Industry Member Transaction Technical</p>

Version	Date	Author	Description
			Specifications Corrected minor typos throughout
2.2	07/18/2024	Consolidated Audit Trail	<p>Added clarification to Section 3.9 – Reporting Multiple Versions of a CAT Customer and new Rule 12 to Section 5.1.3.2 – CAIS Data File Submission – Customer</p> <p>Clarified the Descriptions of the 'CORRECTION' and 'DELETE' <i>correctionAction</i> values</p> <p>Clarified the Description of <i>submissionFilename</i> in Table 23</p> <p>Added the format and compression extensions to the JSON examples in Sections 6.4.3 – JSON Example for Outstanding Material Inconsistencies Feedback and 6.5.1 – JSON Examples for Outstanding Rejections Metadata and Data Feedback</p> <p>Clarified the Explanation for Error Code 22071</p> <p>Please refer to the Full CAIS Industry Member Release Rollout for Release Dates for the following:</p> <ul style="list-style-type: none"> • Added details regarding the FDID Refresh Report to Section 3.8 – Periodic Customer & Account Information Refresh • Extended the maximum length of the <i>firstName</i> and <i>middleName</i> fields • Added <i>firmDesignatedID</i> to the Outstanding Material Inconsistencies Data Feedback File in Section 6.4 – Inconsistencies and updated the description of <i>customerRecordID</i> in Table 23 accordingly • Added Error Codes 22543, 22544 and 22546 • Added that effective with the implementation of Error Code 22544, the guidance under “Proactive Updates Not Allowed” in Section 6.6.4 – Proactive Updates of Customer Record will no longer apply and that Inconsistency Codes 30003 and 40003 in Appendix B will be disabled <p>Renumbered rules and tables as appropriate</p>
2.2.0 r1	12/17/2024	Consolidated Audit Trail	<p>Removed the prohibition on submitting the same value for <i>catReporterCRD</i> and <i>correspondentCRD</i></p> <p>Clarified in Section 3.2 – Replacement of Transformed Identifier (TID) that all Material Inconsistencies must be resolved prior to replacing a Customer's <i>tidValue</i> in order to receive credit</p> <p>Renamed Section 3.8.1 to “JSON Example for FDID Refresh Report” and</p> <ul style="list-style-type: none"> • Changed “File Name” to “Filename” • Removed the double quotations from the date values • Added double quotations to the <i>status</i> values
2.2.0 r2	02/20/2025	Consolidated Audit Trail	Added clarification to Section 3.13 – Special Rules Regarding Natural Person Authorized Traders
2.2.0 r3	03/25/2025	Consolidated Audit Trail	<p>Updated Section 3.8 – Periodic Customer & Account Information Refresh</p> <p>Temporarily removed examples from Table 5: Periodic Refresh Examples</p>
2.2.0 r4	08/14/2025	Consolidated Audit Trail	<p>Reinserted Error Code 21018 to conform with Production validations</p> <p>Corrected minor typos</p>

Version	Date	Author	Description
2.3.0	03/27/2026	Consolidated Audit Trail	<p>Changes to conform with the January 13, 2026 SEC Order Approving Proposed Amendment:</p> <ul style="list-style-type: none"> • Renamed “Customer and Account Information System” to “Reference Database” • Removed Table 1: Industry Customer & Account Specifications Phased Approach, including introduction language and references to the table • Updated references to Customer identifying information to Customer reference data and references to Account identifying information to Account reference data • Updated guidance related to inconsistencies identification and resolution requirements, where applicable, including <ul style="list-style-type: none"> ○ Removed Section 2.4 – Data Inconsistency, Section 5.4.3 – Deadline for Resolving Inconsistencies Identified by CAT CAIS, Section 6.6.3 – Material Inconsistencies and Section 6.6.4 – Proactive Updates of Customer Record ○ Updated Section 6.4.1 – Material Inconsistencies Identification including removal of Rules 5 and 6. ○ Renamed Section 6.6 to “Repairs and Corrections” ○ Updated Explanation for Error Code 22533 ○ Added notification regarding Phase 1B retirement of Inconsistency Codes 30004 and 40004 • Added guidance regarding specific fields that can optionally be reported in Phase 1A that will be removed from the schema in Phase 1B, where applicable • Updated Figure 1 • Updated guidance in Section 3.8 – Reporting Multiple Versions of a CAT Customer • Updated the Include Key to “O” (Optional) for Phase 1A in Table 7: Reference Data File for the following fields: <ul style="list-style-type: none"> ○ accountName ○ addressList ○ addrType ○ addrLine1 ○ city ○ regionCode ○ countryCode ○ postalCode ○ authTraderNamesList ○ authTraderNameID ○ authTraderName ○ firstName ○ lastName ○ doingBusinessAs ○ yearOfBirth

Version	Date	Author	Description
			<ul style="list-style-type: none"> ○ <u>updateNotification</u> ○ <u>legalName</u> ○ <u>ein</u> ● <u>Updated other guidance in Table 7: Reference Data File for fields related to addresses, where applicable</u> ● <u>Added a notification in Table 7: Reference Data File and Table 8: Transformed Identifiers File that in Phase 1B, <i>version</i> must be set to '1.0.0'</u> ● <u>Added a notification in Table 9: Elements of a File Submission Name that in Phase 1B, <i>File Kind</i> must be set to 'REF'</u> ● <u>Added notifications in Table 12: SFTP Directories – Reference Data, Feedback and Reports that in Phase 1B the SFTP directory structure will be different</u> ● <u>Updated JSON examples to reflect Phase 1A reporting requirements</u> ● <u>Updated the example in Section 5.4.1 – Submission to the Reference Database</u> ● <u>Retired the following Error Codes:</u> <ul style="list-style-type: none"> ○ <u>22035</u> ○ <u>22036</u> ○ <u>22037</u> ○ <u>22038</u> ○ <u>22039</u> ○ <u>22050</u> ○ <u>22055</u> ○ <u>22056</u> ○ <u>22057</u> ○ <u>22059</u> ○ <u>22060</u> ○ <u>22072</u> ○ <u>22073</u> ○ <u>22074</u> ○ <u>22504</u> ○ <u>22507</u> ○ <u>22508</u> ○ <u>22509</u> ○ <u>22510</u> ○ <u>22514</u> ○ <u>22515</u> ○ <u>22516</u> ○ <u>22517</u> ○ <u>22518</u> ○ <u>22519</u> ○ <u>22520</u> ○ <u>22521</u> ○ <u>22527</u> ○ <u>22528</u>

Version	Date	Author	Description
			<ul style="list-style-type: none"> ○ 22530 ○ 22532 ○ 22540 ○ 22543 ○ 22544 <ul style="list-style-type: none"> ● Removed CAT NMS Plan-Defined PII from Appendix C and elsewhere ● Renamed sections, as applicable <p>Added reinforcing guidance that plaintext Sensitive Identifiers must not be submitted to the Reference Database and that Input Identifiers must be translated to TID values prior to submission</p> <p>Moved Rules 15 and 16 from Section 5.1.3.1 – Reference Data File Submission – FDID to Section 3.1 – Replacement of FDIDs</p> <p>Moved Rule 31 from 5.1.3.1. Reference Data File Submission – FDID to Section 3.12 – Special Rules for Clearing Firms</p> <p>Moved Rules 28 and 36 from Section 5.1.3.1 – Reference Data File Submission – FDID and Rules 10 and 15 from Section 5.1.3.2 – Reference Data File Submission – CAT Customer to new Section 3.14 – Special Rules for Addresses</p> <p>Deleted Rules 26 and 27 from Section 5.1.3.1 – Reference Data File Submission – FDID and Rules 8 and 9 from Section 5.1.3.2 – Reference Data File Submission – CAT Customer</p> <p>Moved guidance from retired section “Transition from LTID to Full Customer Reporting” to new Rule 17 in Section 5.1.3 – Reference Data File Submission</p> <p>Clarified Rule 10 in Section 5.1.3.1 – Reference Data File Submission – FDID</p> <p>Removed duplicative guidance detailed in:</p> <ul style="list-style-type: none"> ● Rules 17, 22, 29 and 30 in Section 5.1.3.1 – Reference Data File Submission – FDID ● Rules 11, 12, 13, 14 and 16 in Section 5.1.3.2 – Reference Data File Submission – CAT Customer ● Rules 4, 5 and 6 in Section 5.1.4 – Transformed Identifiers File Submission <p>Conformed usage of “Customer” and “CAT Customer” to “CAT Customer”</p> <p>Removed references to expired or temporary guidance, including Section 3.6 – Transition from LTID to Full Customer Reporting and Section 3.9 – Tracking of Historical CAT Customer Names</p> <p>Conformed Data Type in feedback files for “Timestamp (String)” and “Timestamp” to “Timestamp (String)”</p> <p>Retired Error Codes 21009 and 21509 and removed corresponding guidance in Section 5.1.3 – Reference Data File Submission, 5.1.4 – Transformed Identifiers File Submission and Section 5.3.2 – Reference Database Reporter Portal</p> <p>Added Error Code 22078 (to be deployed to the Production Environment in Phase 1B)</p> <p>Retired the following Inconsistency Codes per CAT Alert 2025-02:</p> <ul style="list-style-type: none"> ● 30002 ● 40002 <p>Renumbered sections, rules and tables as appropriate</p>

Version	Date	Author	Description
			<u>Corrected minor typos</u>

1. Introduction

1.1. CAT Overview

The Securities and Exchange Commission (SEC) approved Rule 613 under the Securities Exchange Act of 1934, which requires national securities exchanges and national securities associations (collectively, the Participants) to submit a national market system plan to create, implement, and maintain a consolidated audit trail ([CAT NMS Plan](#)) that would capture customer and order event information for orders in NMS Securities and OTC Equity Securities (Eligible Securities), across all markets, from the time of order inception through routing, cancellation, modification, execution, and allocation. The SEC approved the CAT NMS Plan on November 15, 2016.

In accordance with SEC Rule 613, the CAT NMS Plan requires a Central Repository that will comprehensively track orders throughout their lifecycle and identify the Participants and Industry Members handling them, as well as the account holders and Authorized Traders for any account that originates an order (Customers¹). Specific data elements will be submitted to the Central Repository by Participants, Industry Members, and CAT Reporting Agents. CAT Reporting Agents may be third-party firms reporting on behalf of other entities or may be outside parties that are not required to submit data to the CAT, but from which CAT may receive data per the CAT NMS Plan, such as the Securities Information Processors (SIPs).

The CAT NMS Plan also requires the selection of an entity as the Plan Processor to be responsible for performing the processing functions required by Rule 613 and the Plan. The Operating Committee of Consolidated Audit Trail, LLC, a governing body composed of representatives of the Participants, oversees the operation of the CAT. The duties of the Operating Committee are further described in Article IV of the CAT NMS Plan.

The ~~CAT Reference Database~~²~~Customer & Account Information System (CAIS)~~ is the separate system for submission of Customer and Account reference data. ~~Effective with the Full Customer and Account Reporting Phase (see Table 1), Per CAT NMS Plan requirements,~~ for every *firmDesignatedID* with reportable activity to the Transaction database since June 12, 2022, Industry Members are required to

¹ Customers are defined in SEC Rule 613(j)(3) as: (i) the account holder(s) of the account at a registered broker-dealer originating the order; and (ii) any person from whom the broker-dealer is authorized to accept trading instructions for such account, if different from the account holder(s).

² References to the Reference Database~~CAIS~~ throughout this document are asserted to include both the CAIS-Reference Data Subsystem and the separate CCID Subsystem, unless otherwise explicitly noted.

report the same *firmDesignatedID* to the Reference DatabaseCAIS in an FDID Record along with the required Large Trader information and Customer informationreference data. In addition, Industry Members are required to report changes and additions to FDID Records for “Active Accounts” previously accepted by the Reference Database-CAIS. Section 1.1 of the CAT NMS Plan defines “Active Account” as “an account that has had activity in Eligible Securities within the last six months.” Industry Members are not required to report updates or changes to FDID Records that do not meet the Plan definition of “Active Account” but may optionally do so. Industry Members ~~will also be given~~have the option to mark an account as “inactive” in the Reference DatabaseCAIS. Further, only reference data pertaining to “CAT Customers” of the reporting Industry Member, as defined in SEC Rule 613(j)(3), are required to be reported to the Reference DatabaseCAIS. This includes FDID Records representing proprietary accounts of the Industry Member where the Industry Member itself is to be reported as the CAT Customer. See footnote 1 and the Glossary of this document for more information on the definition of “CAT Customer”.

Refer to SEC Rule 613, available at: <https://www.sec.gov/rules/final/2012/34-67457.pdf> for more details. Refer also to CAT NMS Plan, available at: <https://catnmsplan.com/about-cat/cat-nms-plan>.

2. Reference Database~~Customer & Account~~ Reporting Fundamentals

2.1. Key Data Elements

The sections below describe the key data elements of CAT used in Reference Database~~CAT-CAIS~~ submission files. A Reference Database~~CAT-CAIS~~ submission is comprised of two files – a CAIS Reference Data File and a Transformed Identifiers File – to facilitate separation of the Customer and Account reference data from the Transformed Identifier used to uniquely reference a single CAT Customer.

2.1.1. Firm Identifiers in File Submissions

The CAT submissions process relies on certain firm identifiers to determine whose data is being reported, and to determine and verify the authorization of the submitter of the data.

CAT Reporter CRD

The CAT Reporter CRD is the Industry Member's Central Registration Depository (CRD) number, used to ensure all Account and Customer reference data reporting activity of a single Industry Member can be consolidated at the CRD level in the Reference Database~~CAT-CAIS~~. The CAT Reporter CRD must be populated in the CAIS-Reference Data filename and Transformed Identifiers filename as well as populated in the *catReporterCRD* field within the CAIS-Reference Data File.

CAT Submitter ID

The CAT Submitter ID is a CAT-assigned identifier for a firm that submits data to CAT. The CAT Submitter ID uniquely identifies the CAT Submitter and may be a different identifier than the CAT Reporter CRD.

The CAT Submitter ID must be populated in the CAIS-Reference Data filename and Transformed Identifiers filename as well as populated in the *catSubmitterID* field within the CAIS-Reference Data File.

Industry Members may submit data for themselves or may authorize a separate CAT Submitter to report on their behalf. Authorization between the Industry Member and CAT Submitter is granted through a reporting relationship that is entered by the Industry Member via the CAT Reporter Portal. When a file is received, the Reference Database~~CAT-CAIS~~ will verify that the Industry Member has authorized the CAT Submitter to submit on its behalf. See the CAT-CAIS Reporter Portal User Guide-Reference Database Reporter Portal User Guide for more information on reporting relationships.

Correspondent CRD

The Correspondent CRD is the CRD of the introducing broker or correspondent firm whose customer and account data is kept on record at the clearing firm. It is populated in the *correspondentCRD* field within the [CAIS Reference](#) Data File.

The *correspondentCRD* field is populated by clearing firms with introducing brokers or correspondents when reporting Accounts to [the Reference DatabaseCAIS](#) that are custodied for their introducing brokers/correspondents, including DVP/RVP accounts.

The *correspondentCRD* field is at the main level within the JSON structure of the [ReferenceCAIS](#) Data File, and as such will apply to all records within the file. Thus, if the clearing firm custodies Accounts for multiple correspondent firms, Accounts for each individual correspondent must be grouped into a separate file. For firms reporting data of multiple correspondents, a separate file must be used for each *correspondentCRD*.

Since all FDID and Customer [reference](#) data included in a submission file will be associated to the *catReporterCRD* and *correspondentCRD* pairing, any rejections ~~or Material Inconsistencies~~ resulting from a submission must be repaired ~~or resolved~~ by resubmitting a file with the same *catReporterCRD* and *correspondentCRD* pairing. Thus, if an Industry Member submitted a file where the *catReporterCRD* and *correspondentCRD* values were the same, and records within the submission resulted in Data Validation errors ~~or Material Inconsistencies~~, the Industry Member must resubmit a file with the same *catReporterCRD* and *correspondentCRD* values as the submission that resulted in errors. See [Section 6.6](#) for more information on error repair ~~and resolution~~. A submission where *catReporterCRD* and *correspondentCRD* values were the same will be considered a submission for the CAT Reporter CRD (“self-reporting”).

~~CAT CAIS~~ [The Reference Database](#) will not validate that a business relationship exists between the clearing firm and the correspondent firm.

Note that clearing firms and introducing brokers/correspondents have their own separate and distinct [CAIS Reference Database](#) reporting obligation.

2.2. Reference Data

2.2.1. Firm Designated ID (FDID)

Section 6.4 of the CAT NMS Plan requires that for the original receipt or origination of an order, Industry Members must report the Firm Designated ID (FDID). FDID is reported in the *firmDesignatedID* field and is defined in Section 1.1 of the CAT NMS Plan as:

“(1) a unique and persistent identifier for each trading account designated by Industry Members for purposes of providing data to the Central Repository provided, however, such identifier may not be the account number for such trading account if the trading account is not a proprietary account; (2) a unique and persistent relationship identifier when an Industry Member does not have an account number available to its order handling and/or execution system at the time of order receipt, provided, however, such identifier must be masked; or (3) a unique and persistent entity identifier when an employee of an Industry Member is exercising discretion over multiple client accounts and creates an aggregated order for which a trading account number of the Industry Member is not available at the time of order origination, where each such identifier is unique among all identifiers from any given Industry Member.”

~~Before the reporting of Customer Account Information and Customer Identifying Information begins, regulatory users of the CAT will use FDIDs to identify whether the same Account is trading within a single broker-dealer. After the reporting of Customer Account Information and Customer Identifying Information begins, FDIDs will be used to link Accounts order and allocation activity to specific CAT Customers, including mapping Accounts FDIDs with common ownership (for instance, where a CAT Customer is associated with more than one FDID). Therefore, an FDID is required to be populated on all Transaction order and allocation events requiring an FDID for equities, options and multi-leg events.~~

Industry Members must assign a single FDID to each trading Account that is unique, persistent and consistent within the Industry Member and across all vendors and systems the Industry Member may use to report Transaction order and allocation events requiring an FDID to CAT. ~~Likewise, and any~~ associated Customer and Account ~~reference data information~~ for the FDID ~~must also be consistent within the Industry Member and across all vendors and systems used to report Reference Data to CAT. to CAT CAIS, and unique across time.~~ For example, if an Industry Member uses multiple vendors for reporting Transaction data to CAT, the Industry Member must ensure that all vendors use the same FDID for a particular trading Account in all CAT Transaction order and allocation events requiring an FDID, and that the same FDID associated with the trading Account is submitted to the ~~Reference Database Customer and Account Information System.~~

Examples of what an FDID would represent include:

- Individual Customer Account Number
- Institutional Customer Account Number
- Account Number of Average Price Account Designated for a Specific Customer (e.g., Master Account or agency Representative Order scenarios)
- Account Number of Firm Average Price Account Shared Across Customers (e.g., Master Account, Account Used For Agency Representative Order Flows)

- Proprietary Trading Account Number
- Industry Member-assigned identifier representing a trading relationship (Relationship ID) can be used when the trading account structure is unavailable at the time the order was placed
- Industry Member-assigned identifier (Entity ID) representing the Industry Member's discretionary relationship with the client when an employee of the Industry Member is exercising discretion over multiple client accounts and creates an aggregated order for which a trading account number of the Industry Member is unavailable at the time of order origination.

An actual customer account number must not be used as the FDID ~~for a Customer Account~~ for CAT reporting and the same guidance would apply to an FDID representing a Relationship ID. See [FAQ M2](#) for more information on the prohibition on use of actual account numbers, and [FAQ M10](#) for more information on masking. Also, refer to the [CAT Industry Presentation](#) on FDID for additional information.

A change/replacement in the FDID value associated with a particular trading account, Relationship ID, and Entity ID would be an isolated event that is only permissible in certain limited circumstances, such as system migration, change of vendors, change in clearing firm, and change in masking methodology used for FDID values. See [FAQ M16](#) for more information on replacing/changing an FDID.

2.2.2. Large Trader ID (LTID) and Unidentified Large Trader ID (ULTID)

LTID is an identifier assigned by the SEC to a "large trader," defined as a person whose transactions in NMS securities equal or exceed:

- 2 Million shares or \$20 Million in any single calendar day; OR
- 20 Million shares or \$200 Million in any calendar month

A person qualifying as a large trader is required to submit Form 13H to the Commission and be assigned an LTID. ~~In accordance with the CAT NMS Plan as amended for LTID,~~ Industry Members are required to report all LTIDs associated to their FDIDs in plaintext as part of their [Reference Database Customer and Account](#) reporting. Thus, Industry Members are required to obtain the LTID for each Account (to the extent that an LTID exists). LTIDs and related information are reported in the *largeTraderList*.

If a clearing firm determines a person (which includes both natural persons and legal entities under Section 13(h)(8)(e) of the Exchange Act) would qualify as a large trader, but the firm has not yet been provided with an LTID by the person, the clearing firm is required to assign an ULTID to the person until such time as the person provides its LTID. Any clearing firm with an obligation to assign an ULTID under the large trader rule is required to report any assigned ULTIDs associated to its reported [CAT Customers](#) in plaintext as part of its [Reference Database Customer and Account](#) reporting. ULTIDs and related information are reported in the *largeTraderList*.

Industry Members that are not self-clearing and do not have an obligation to assign ULTIDs are not required to report ULTIDs to CAT as they will have no such number to report.

The LTID/ULTID is associated to the FDID Record, not the Customer Record.

~~Please refer to Section 4—CAIS Reporting for information regarding the format requirements of the LTID and ULTID.~~ For purposes of the CAT CAIS Reference Database Reporting Technical Specifications, references to LTID fields and scenarios throughout the document are intended to cover both LTID and ULTID usage in accordance with the reporting obligations noted above.

2.2.3. FDID Open Date

The FDID open date is included in the ~~CAIS data Reference Data File schema~~ as *fdidDate*. The *fdidDate* field must be populated with either:

- Date in which the account was opened, or
- The Account Effective Date, as defined in Section 1.1 of the Plan, in the following circumstances:
 - The Industry Member has established a trading relationship, but not an account, with an institution or client
 - Proprietary trading accounts of the Industry Member
 - Accounts opened prior to the implementation date of the CAT NMS Plan applicable to the relevant Industry Member
 - The Industry Member has acquired another Industry Member and the Account Open Date was changed to a date value on or after the completion of the merger

Please see [FAQ Q42](#) for additional details.

2.2.4. CAT Customer

The CAT NMS Plan defines the term “Customer” as having the same meaning provided in SEC Rule 613(j)(3), which is as follows:

- (i) The account holder(s) of the account at a registered broker-dealer originating the order; and
- (ii) any person from whom the broker-dealer is authorized to accept trading instructions for such account, if different from the account holder(s).

2.2.5. Input Identifiers

Input Identifiers is a generic term for the types of identifiers used to identify unique Customer Records. Input Identifiers are always translated to Transformed Identifier values (“TID value” or “*tidValue*”) prior to

submission to CAT. The Plan Processor translates Transformed Identifier values into CAT Customer IDs. See [Section 2.2.6](#), [Section 2.2.7](#) and [Section 3.4](#) for more information.

Input Identifiers [to be transformed to TID values prior to submission to CAT](#) include:

- Social Security Number (SSN)/Individual Taxpayer Identification Number (ITIN)
- Employer Identification Number (EIN, including QI-EIN, WP-EIN, and WT-EIN)
- Foreign Identifiers

~~In accordance with Plan requirements,~~ Industry Members must reconcile each CAT Customer to a single Input Identifier and therefore a single *tidValue*, even if the [CAT](#) Customer is associated to multiple FDIDs. It is not permissible for a single [CAT](#) Customer to have multiple *tidValues*. If an Industry Member obtains a new Input Identifier for a [CAT](#) Customer that was previously reported to [the Reference DatabaseCAIS](#), the [CAT](#) Customer's *tidValue* must be updated for all Customer-to-FDID associations at the Industry Member. Clearing firms with correspondents that have foreign customers, please refer to the additional guidance in ~~[Section 3.14—Special Rules for Clearing Firms](#)~~[Section 3.12 – Special Rules for Clearing Firms](#).

Refer to [FAQ Q57](#) for details regarding handling the selection of a specific Input Identifier for generating a *tidValue* when an Industry Member has multiple values for the same Input Identifier type for a CAT Customer.

2.2.5.1. U.S. Tax Identifiers

Social Security Number (SSN) and Individual Taxpayer Identification Number (ITIN) are considered Sensitive Identifiers and **must not** be submitted in [any of the fields in the CAIS-Reference](#) Data File.

~~However, the~~ Employer Identification Number (EIN) is not a Sensitive Identifier. [Per the CAT NMS Plan approved on January 13, 2026, the requirement that Industry Members report the plaintext EIN was eliminated. To allow Industry Members and the Plan Processor time to update code to conform with the updated reporting requirements, some previously conditionally required fields, including *ein*, can be optionally reported for a limited time. Note that in Phase 1B, the *ein* field will be removed from the schema and will result in a rejection if submitted.](#)

~~and must be submitted in plaintext in the CAIS Data File.~~ If the [CAT](#) Customer has an SSN, ITIN, or EIN, it must always be used as the Input Identifier even if other Input Identifiers (i.e., Foreign Identifiers) exist.

Input Identifiers used to generate TID values must be input in valid format, including the hyphen(s) – that is, 999-99-9999 for SSN or ITIN, and 99-9999999 for EIN.

2.2.5.2. Foreign Identifiers

A Legal Entity Identifier (LEI) is not considered a Sensitive Identifier and must be submitted in plaintext in the [ReferenceCAIS](#) Data File [if known to the Industry Member](#). All other foreign identifier values are considered Sensitive Identifiers and **must not** be submitted in the [ReferenceCAIS](#) Data File.

Foreign Identifiers are **only** permissible to use for foreign Natural Person or foreign Legal Entity [CAT](#) Customers that do not have a U.S. Tax Identifier. Further, foreign identifiers **must** be used for Natural Persons and Legal Entities that do not have a U.S. Tax Identifier. For example, a Natural Person residing in the U.S. that does not have a U.S. Tax Identifier and a U.S.-based intergovernmental organization that does not have a U.S. Tax Identifier must be reported to [the Reference DatabaseCAIS](#) with a foreign identifier type.

Examples of foreign identifiers include:

- Legal Entity Identifier (LEI)
- EU Member State National Client Identifier (NCI) in accordance with MIFID II
- Country of Domicile and Passport Number
- National Identity Card
- Permanent Resident Card Number
- Driver's License
- Other Government-Issued Identifier

Format validation will not occur for foreign Input Identifiers.

If an Industry Member has more than one foreign identifier collected for a CAT Customer (e.g., a National Registration and a Passport for a Natural Person) – and the [CAT](#) Customer does not have an EIN, SSN, nor ITIN – the Industry Member must always use a single, consistent Input Identifier to generate the *tidValue* for the [CAT](#) Customer across all Customer Records submitted by the Industry Member, irrespective if such Customer Records are associated with different FDID Records. Clearing firms with correspondents that have foreign customers, please refer to the additional guidance in [Section 3.14 – Special Rules for Clearing Firms](#)~~Section 3.14 – Special Rules for Clearing Firms~~. The following hierarchy must be followed if more than one identifier type is available for a foreign CAT Customer:

1. National Registration or Tax Identifier – usable for Natural Person and Legal Entity CAT Customers
2. LEI – usable only for Legal Entity CAT Customers
3. Country of Domicile and Passport Number – usable only for Natural Person CAT Customers
4. Permanent Resident Identifier – usable only for Natural Person CAT Customers

5. Driver's License – usable only for Natural Person CAT Customers
6. Other Government-Issued Identifier – usable for Natural Person and Legal Entity CAT Customers

If the Industry Member obtains a new foreign identifier for a CAT Customer that was previously reported to the Reference DatabaseCAIS and the new foreign identifier replaces the CAT Customer's identifying information within the Industry Member's systems, the new foreign identifier must be used to generate a new *tidValue* for the CAT Customer and must be reported to the Reference DatabaseCAIS for all Customer-to-FDID associations at the Industry Member. If the newly obtained foreign identifier is lower on the hierarchy, it is acceptable for the Industry Member to generate the CAT Customer's new *tidValue* from the new foreign identifier (for example, if a CAT Customer's passport expired and the CAT Customer provided the Industry Member with a driver's license). See Section 3.2 Replacement of Transformed Identifier (TID) for information on replacing a CAT Customer's *tidValue*.

When a foreign identifier is used to generate a TID and included in the Transformed Identifiers File, the *foreignTIDType* must be present and populated to indicate what type of identifier was used to generate the TID.

2.2.6. Transformed Identifier (TID)

The Transformed Identifier (TID) is a hashed version of the Input Identifier submitted to CAT by the Industry Member or its CAT Reporting Agent in place of the Input Identifier, ~~in accordance with the exemptive relief granted by the SEC on March 17, 2020~~. The Industry Member has the responsibility to translate Input Identifiers to TID values (reported in the *tidValue* field) prior to submission, in accordance with the mathematical logic provided in Section 3.4 –Translation of Input Identifiers to TID Values. Input Identifiers used to generate TID values must be input in valid format, including the hyphen(s) – that is, 999-99-9999 for SSN or ITIN, and 99-99999999 for EIN. Format validation will not occur for foreign Input Identifiers.

2.2.7. Customer ID

The Customer ID, also known as CAT Customer ID or CCID, is a unique identifier generated by the Plan Processor, that is defined within SEC Rule 613(j)(5) as “with respect to a customer, a code that uniquely and consistently identifies such customer for purposes of providing data to the central repository.” The CCID is a globally unique identifier generated for each unique TID value generated from a well-formatted and valid Input Identifier, in a way that is not reversible to the TID or textual Input Identifier value. The translation of TID to CCID is completed in the CCID Subsystem, in isolation from any of the Customer or Account reference data.

The CCID value is never provided to Industry Members or CAT Submitters and is only used within CAT to uniquely reference a single [CAT](#) Customer.

2.2.8. Customer Record ID

A Customer Record ID, populated in the *customerRecordID* field, is a unique reference to a single [CAT](#) Customer for a paired submission. This field is required when reporting a [CAT](#) Customer in association to an FDID. Figure 1, below, shows that the *customerRecordID* provides [the Reference DatabaseCAIS](#) with linkage between the [CAT](#) Customer's [information-reference data](#) contained within the [CAIS-Reference](#) Data File and the [CAT](#) Customer's [information-reference data](#) contained within the Transformed Identifiers File. For this reason, the *customerRecordID* in the Transformed Identifiers File must reference the *customerRecordID* in the [ReferenceCAIS](#) Data File for the same [CAT](#) Customer. For a paired submission of a [ReferenceCAIS](#) Data File and Transformed Identifiers File, each [CAT](#) Customer's *customerRecordID* is present three times:

- In the [ReferenceCAIS](#) Data File, it is in the *fdidCustomerList* and;
- In either the *naturalPersonCustomerList* or the *legalEntityCustomerList*.
- In the Transformed Identifiers File, it is in the *tidRecordList*.

2.3. [CAT-CAIS-Reference Database](#) Architecture

2.3.1. CCID Subsystem

The CCID Subsystem is an isolated subsystem of [the Reference DatabaseCAT-CAIS](#) that exists solely to translate input TID values into CCID values. The Transformed Identifiers File, sent only to the CCID Subsystem and containing the combination of the *customerRecordID* pointer and TID, translates the TID to CCID, and passes the combination of *customerRecordID* and CCID to the [CAIS-Reference](#) Data Subsystem, where the *customerRecordID* is used to associate the assigned CCID with the corresponding Customer Record.

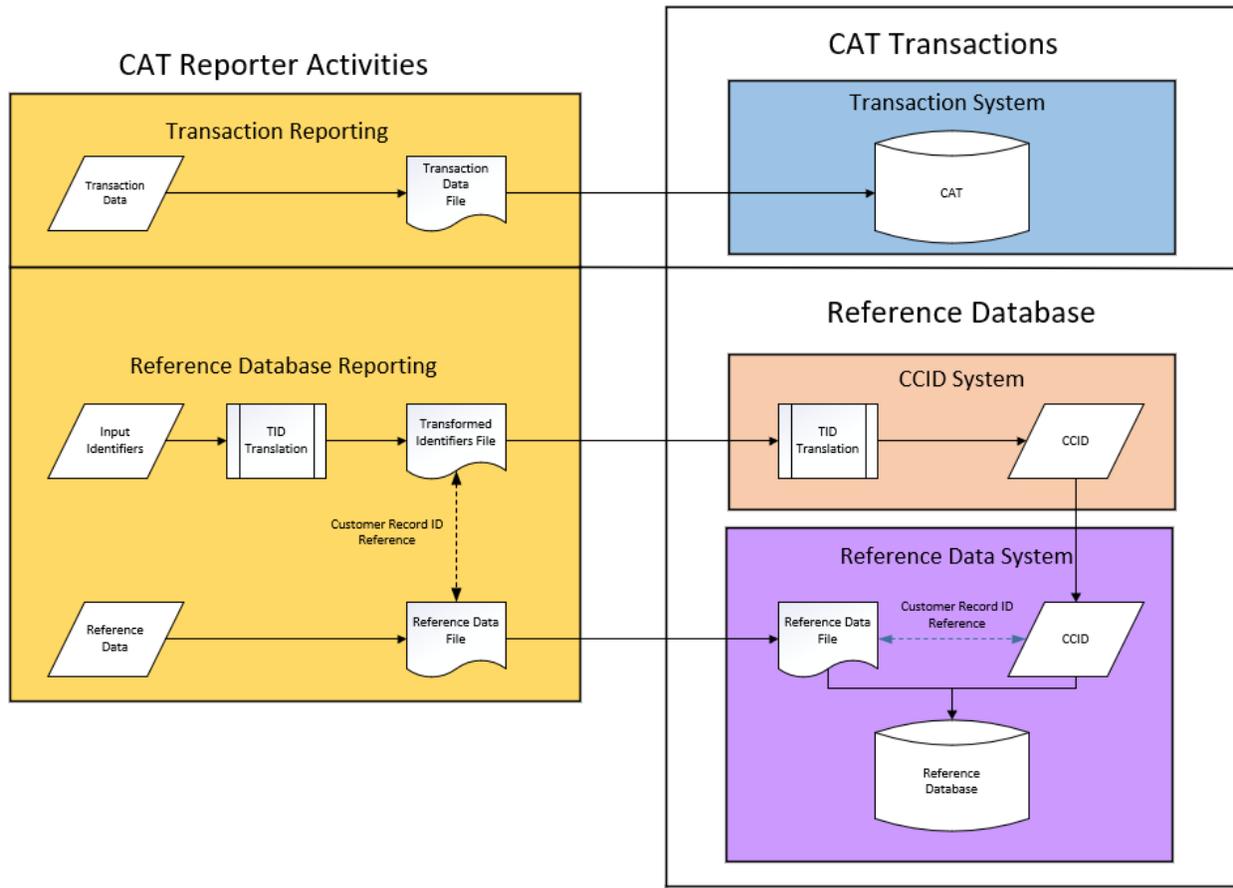
2.3.2. [CAIS-Reference](#) Data Subsystem

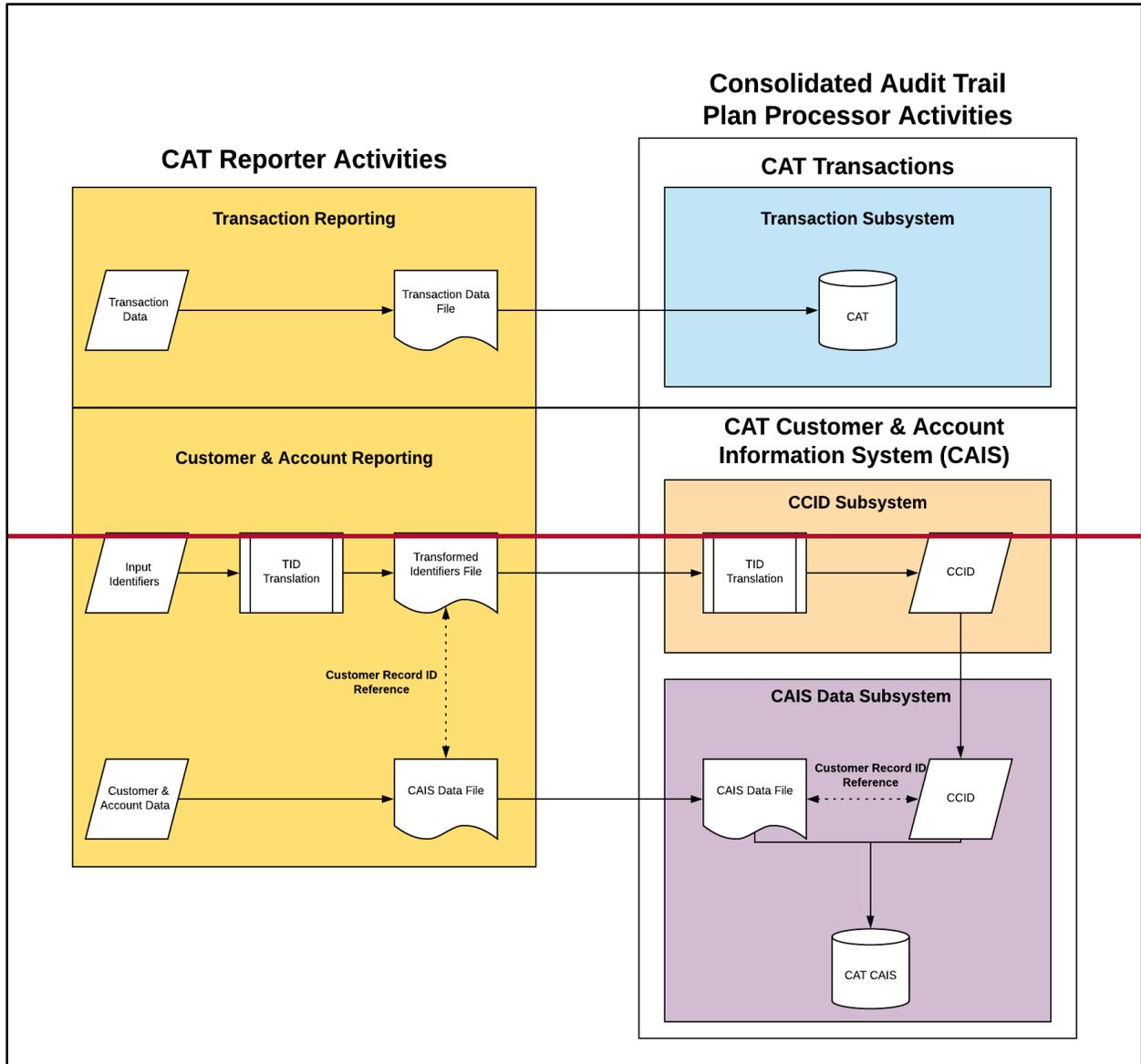
The [CAIS-Reference](#) Data Subsystem is an isolated subsystem of [the Reference Database CAT-CAIS](#) that exists for receipt and storage of Customer and Account [reference](#) data. The [ReferenceCAIS](#) Data File, sent only to the [ReferenceCAIS](#) Data Subsystem and containing the Customer and Account submission [reference](#) data, receives the combination of *customerRecordID* and CCID from the CCID Subsystem, and associates the assigned CCID with the corresponding Customer [reference](#) data.

The following diagram provides an overview of the flow of translating Input Identifiers to TID values by the reporting firm, the separation of the TID data from the Customer and Account reference data, and the translation of TID values to CCID values in the isolated CCID Subsystem so that TID is never known to the ReferenceCAIS Data Subsystem.

Figure 1: CAT Reporting Activities

Consolidated Audit Trail Plan Processor Activities





~~2.4. Data Inconsistency~~

~~In accordance with the CAT NMS Plan Appendix D, Section 9.4, the CAT system must implement procedures and mechanisms to handle both minor and material inconsistencies in Customer information submitted to CAT.~~

~~Data Inconsistencies occur when comparing one version of a Customer Record to another version of the same Customer's record—either submitted by the same Industry Member or submitted by different Industry Members—and certain field values differ. As detailed in [Section 6.4.1](#), data inconsistency checks are only applied against certain fields in the Customer Record. It is expected and acceptable that some Customer information (for example, an address) may differ across FDID Records. Data Inconsistencies can occur:~~

- ~~• Across multiple submission files of a single Industry Member (intrafirm inconsistency)~~
- ~~• Across multiple submission files of multiple Industry Members (interfirm inconsistency).~~

~~**Minor Inconsistencies** are provided for informational purposes only, and do not require correction. There are no minor inconsistencies defined at this time, however the infrastructure is in place in accordance with the CAT NMS Plan requirements.~~

~~**Material Inconsistencies** are identified by CAT when Customer Records have passed data validation checks, but data inconsistency checks have found inconsistent Customer data. Feedback associated with Material Inconsistencies is provided and Industry Members that receive Material Inconsistency notifications must take action to resolve them within the Plan established deadlines described in [Section 5.4.3—Deadline for Resolving Inconsistencies Identified by CAT CAIS](#).~~

~~More information on Material Inconsistencies can be found in [Section 6.4](#), [Section 6.6.3](#) and [Section 6.6.4](#).~~

~~2.5.2.4. Data Types~~

~~CAT Customer and Account [reference](#) data must be reported using JSON text files. Data types used throughout this document are described below. Data types used for [Reference Database CAT Customer and Account](#) reporting are a subset of the data types used for CAT transaction reporting, with the following difference:~~

- ~~• Timestamp – only STRING versions of timestamp are supported in [Reference Database Customer and Account](#) reporting.~~

To support JSON submissions, the Industry Member [Reference Database Customer and Account Schema \(JSON\)](#) file is available on the CAT public website that describes each data type with required representation formats.

2.5.1.2.4.1. Data Validation Based on Data Types

All Customer and Account [reference](#) data submitted to CAT will be validated based on the defined data type of each item, including proper formatting and range checking. Examples of accepted values are detailed in the table below. Valid values for Choice fields are defined in the Data Dictionary for each data element. Valid data values, ranges, and formats will be specified in the record schema files, which will be used to validate submitted data element values. Records and values that fail validation will be rejected and will be reported as feedback to the Industry Member (and CAT Submitter, if applicable) as detailed in [Section 6 – Feedback and Corrections](#).

Table 2: Data Types

Data Type	JSON Type	Description
Unsigned	NUMBER	An unsigned value, greater than or equal to zero, with no decimal fraction component, in the inclusive range from 0 to 9,223,372,036,854,775,807 (the same range as a 63-bit unsigned integer). JSON parsing does not allow for leading zero (0) values in a Number JSON type field. Any leading zero characters in a Number JSON type field will result in a file integrity error for invalid JSON.
Boolean	BOOLEAN	A value with two choices: 'true' or 'false'. In JSON representation, if the field is not present, the value is considered 'false'.
Alphanumeric	STRING	A string, composed only of letters and digits [a-zA-Z0-9]. When an Alphanumeric type is described, it will include a number, indicating the maximum length of the field. For example, Alphanumeric (7) means that the field can contain up to 7 characters. Alphanumeric values are case sensitive.
Text	STRING	<p>A string, composed of any printable ASCII character between 32 and 126. The string may not include the following characters which serve as delimiters:</p> <ul style="list-style-type: none"> • comma (ASCII decimal 44, hex 2C), • pipe (ASCII decimal 124, hex 7C), • double quote (ASCII decimal 34, hex 22), and • @ (ASCII decimal 64, hex 40). <p>When a Text data type is described, it will include a number, indicating the maximum length of the field. For example, Text (7) means that the field can contain up to 7 characters. Text values are case sensitive.</p> <p>When represented in JSON, the following rule applies: Backslash '\' is a reserved printable character in JSON and must be escaped in order to be used in strings by inserting a backslash prior to it within the string. For example: <i>firmDesignatedID</i> = 1234\ABCD must be reported to CAT as "firmDesignatedID": "1234\ABCD". If the backslash is not escaped, the submitted record will be rejected. Escape characters do not participate in</p>

Data Type	JSON Type	Description
		the field value length.
Extended Text	STRING	<p>A string, composed of any printable ASCII character between 32 and 255. Note that after UTF-8 encoding, the range of printable ASCII characters is between 32 and 126 and 160 and 255. ASCII characters 127 through 159 are not printable after UTF-8 encoding.</p> <p>When an Extended Text data type is described, it will include a number, indicating the maximum length of the field. For example, Extended Text (7) means that the field can contain up to 7 characters. Extended Text values are case sensitive.</p> <p>When represented in JSON, the following rule applies: Backslash '\ ' and double quote '"' are reserved printable characters in JSON and must be escaped in order to be used in strings by inserting a backslash prior to the reserved character within the string. For example: <i>legalName</i> = 12"34\ABCD must be reported to CAT as "legalName": "12"34\\ABCD". If the backslash or double quote is not escaped, the submitted record will be rejected. Escape characters do not participate in the field value length.</p>
Date	NUMBER	An 8-digit integer representing the date in YYYYMMDD. JSON parsing does not allow for leading zero (0) values in a Number JSON type field. Any leading zero characters in a Number JSON type field will result in a file integrity error for invalid JSON.
Year	NUMBER	A 4-digit integer representing the year in YYYY. JSON parsing does not allow for leading zero (0) values in a Number JSON type field. Any leading zero characters in a Number JSON type field will result in a file integrity error for invalid JSON.
Timestamp	STRING	<p>A timestamp represents a moment in time. All timestamps must be in Eastern Time (ET).</p> <p>Timestamps formatted as a STRING have a maximum length of 25 and are formatted as 'YYYYMMDD HHMMSS.CCCNNNNNN' with the Date and Time portions, separated by a space (ASCII decimal 32, hex 20) or the letter T (ASCII decimal 84, hex 54).</p> <ul style="list-style-type: none"> The Date portion must include four-digit year, two-digit month, and two-digit day. Valid values: YYYY = 0000 - 9999, MM = 01 - 12, DD = 01 - 31. The Time portion must include a two-digit hour, two-digit minute, and two-digit seconds. Valid values: HH = 00 - 23, MM = 01 - 59, SS = 01 - 59, CCC = 000 - 999, NNNNNN = 000000 - 999999. <p>Examples which comply with Timestamp in STRING format:</p> <ul style="list-style-type: none"> 20190617T000120.000000000 20190617T000120 20190617T000120.000 20170107T213000.123456789 20170107 213000.123456789 20190617 000120.123000000 <p>Examples which do not comply with Timestamp in STRING format:</p> <ul style="list-style-type: none"> 20190617T0120 20190617T000120.

Data Type	JSON Type	Description
Name/Value Pairs	OBJECT	<p>An object composed of a list of zero or more attributes where each attribute is either a name with no value, or a name with an accompanying value. Multiple attributes are separated by a delimiter.</p> <p>When represented in JSON, the following rules apply:</p> <ul style="list-style-type: none"> • The OBJECT is contained within curly brackets { } • Name/Value Pairs are comma separated • A value accompanied by a name must be formatted as per the data type syntax required in JSON
Array	ARRAY	<p>A list of 0, 1 or more values of the same data type.</p> <p>When represented in JSON, the following rules apply:</p> <ul style="list-style-type: none"> • ARRAY is within a set of brackets [] • Elements within the array are comma separated.
Choice	STRING	<p>A Text field with an explicit list of acceptable values. The Data Dictionary section of this document lists the acceptable values for each Choice field.</p>
Multi-Dimensional Array	Multi-Dimensional ARRAY	<p>A compound object that consists of an array of objects. The JSON syntax for this data type is consistent with other Multi-Dimensional Array JSON Types. Multi-Dimensional Array is specified as the data type within the Ssubmissions file as well as the fFeedback response file.</p> <p>When represented in JSON, the following rules apply:</p> <ul style="list-style-type: none"> • ARRAY is within a set of brackets [] • Each OBJECT contained in the ARRAY is within curly brackets { } • Elements within each object are comma separated • Conditional elements that do not have a value are not required to be included.
Hexadecimal	String	<p>A string, composed only of valid hexadecimal characters [a-fA-F0-9]. When a Hexadecimal type is described, it will include a number, indicating the maximum length of the field. For example, Hexadecimal (7) means that the field can contain up to 7 characters. Hexadecimal values are case insensitive.</p>

2.5.2.2.4.2. Required, Conditional, and Optional Fields

Throughout this document, record fields will be defined. Each field will be notated with the abbreviation R, C, or O to represent whether it is required, conditional, or optional. This codification will appear within each row of a table describing a field.

Table 3: Include Key

Value	Abbreviation	Description
Required	R	Required for the given record. This field must always be included.
Conditional	C	Conditionally required for the submission , either when paired with another field or fields, or when such data is applicable to the CAT Customer and/or FDID

Value	Abbreviation	Description
		Record.
Optional	O	Optional for the given record. May be included at the discretion of the Industry Member/Submitter.

3. Special Reporting Requirements

3.1. Replacement of FDIDs

The current functionality enables the replacement of a single *firmDesignatedID* at a time using the *replacedByFDID* field. If an Industry Member desires to replace one or more of its *firmDesignatedIDs* due to one of the limited circumstances outlined in [FAQ M16](#), it is able to do so by submitting each individual *firmDesignatedID* to be replaced and the *replacedByFDID* field indicating which *firmDesignatedID* has taken its place. There is no limit to how many *firmDesignatedIDs* can be replaced within a submission file, other than the standing record limits for file transmission.

The *replacedByFDID* value included in a submission file must reference an FDID that is either included in the current submission file or was accepted by the Reference Database in a prior submission file. If the *replacedByFDID* record in a submission file was not accepted by the Reference Database in a prior submission file and is not included in the current submission file or is included in the current submission file but the replacing FDID Record does not pass data validation checks, the submission record referencing the replacing FDID will fail data validation and will not be accepted by the Reference Database.

3.2. Replacement of Transformed Identifier (TID)

In order to satisfy Plan requirements for a unique CAT Customer ID, Industry Members must replace a CAT Customer's *tidValue* in scenarios where a CAT Customer's Input Identifier changes. If the Industry Member obtains a new Input Identifier for a CAT Customer that was previously submitted to the Reference Database-CAIS, it must update the CAT Customer's *tidValue* for all Customer-to-FDID associations at the Industry Member. ~~If a CAT Customer's *tidValue* is to be replaced, the Industry Member must resolve all Outstanding Material Inconsistencies prior to replacement in order to receive credit for the resolution. See [Section 6.4](#) for more information on inconsistencies.~~

There are three ways to replace the CAT Customer's Input Identifier in the Reference DatabaseCAIS and the manner by which replacement must be reported to the Reference DatabaseCAIS depends on **why** it is being updated:

- In one scenario, the Input Identifier was legally changed or the Industry Member obtained a different foreign Input Identifier that replaces the current foreign Input Identifier. This is the only scenario where the use of the *replacedByTID* functionality is permissible. It allows the previous *tidValue* to link to the new *tidValue* and indicates to regulators that the same CAT Customer has always been associated to the FDID. Examples include but are not limited to: when a CAT Customer's Input Identifier was changed from an ITIN to an SSN, a Foreign Legal Entity or

Natural Person CAT Customer obtained a U.S.-assigned Input Identifier, a customer's passport number changed upon reissuance, or a Legal Entity CAT Customer's EIN changed due to a corporate merger or acquisition. In this scenario, Industry Members must report this to the Reference Database CAIS by:

1. Including in the Transformed Identifiers File:
 - a. A record for the CAT Customer's previous TID noting the *replacedByTID* and *replacedByTIDType*³; and
 - b. A record for the CAT Customer's new TID; and
2. Including in the CAIS-Reference Data File:
 - a. A record for the CAT Customer being replaced including a *roleEndReason* of 'REPLACED' and a *roleEndDate*. The Customer-to-FDID association must be explicitly ended in the submission file. It is not permissible to end the Customer-to-FDID association by omitting the *roleEndReason* and *roleEndDate* fields; and
 - b. A new record for the CAT Customer with an active *role* and *roleStartDate*. The *roleStartDate* must represent the date on which the CAT Customer entered into the specified *role*; not the date that the *tidValue* was replaced.

Note that if a CAT Customer's *tidValue* is replaced with another *tidValue* using the *replacedByTID* functionality and multiple versions of the same CAT Customer are present within the paired file submission, all of the CAT Customer's original *tidValues* must also be replaced. Customer Records that do not have the appropriate "replacedBy" fields will get Warning Code 24911 (Missing or invalid *replacedByTID*).

- If a CAT Customer's Transformed Identifier (TID) was initially submitted to and accepted by the Reference Database CAIS based on an Input Identifier value that was later determined to be incorrect and was never intended to be associated with the CAT Customer, it is not permissible to use the *replacedByTID* functionality. Reporting as described below will not link the previous *tidValue* to the new *tidValue* and indicates to the regulators that the CAT Customer should not have been associated to the FDID. Examples include but are not limited to: when a *tidValue* was generated from an Input Identifier value that was incorrect and never associated with the CAT

³ If the *replacedByTIDType* is 'FOREIGN', the Industry Member is also required to populate the *replacingForeignTIDType* and *replacingForeignTIDCountryCd* fields, as applicable.

Customer due to a manual entry error in the Industry Member's customer database or the customer initially provided the Industry Member with an incorrect Input Identifier. Upon receiving or determining the correct Input Identifier for the customer, the Industry Member must update the record by:

1. Including in the Transformed Identifiers File:

- a. A record for the [CAT](#) Customer's previous, incorrect *tidValue*; and
- b. A record for the [CAT](#) Customer's new *tidValue* that was generated from the correct Input Identifier value for the [CAT](#) Customer; and

2. Including in the [CAIS-Reference](#) Data File:

- a. A record for the [CAT](#) Customer associated with the *tidValue* generated from the incorrect Input Identifier value, with a *roleEndReason* of 'CORRECTION' and a *roleEndDate* populated with the same date as the *roleStartDate* to indicate that the Customer Record should not have been associated to the FDID. The Customer-to-FDID association must be explicitly ended in the submission file and cannot be omitted; and
 - b. A new record for the [CAT](#) Customer associated with the *tidValue* generated from the correct Input Identifier value, with a *roleStartDate* reflecting the date the [CAT](#) Customer originally entered into the specified *role* and not the date that the new *tidValue* was generated based on the correct Input Identifier.
- Per [FAQ Q12](#), if the Industry Member has made a reasonable effort to obtain an accurate reason as to why the [CAT](#) Customer is no longer associated to the FDID, and the Industry Member was unable to ascertain if the [CAT](#) Customer's Input Identifier was replaced with another Input Identifier (*roleEndReason* of 'REPLACED') or the [CAT](#) Customer was erroneously associated to the FDID (*roleEndReason* of 'CORRECTION'), the Industry Member may populate the [CAT](#) Customer's *roleEndReason* with 'OTHER'. Reporting as described below will not link the previous *tidValue* to the new *tidValue* and indicates to the regulators that the Industry Member was unable to ascertain why the Input Identifier was replaced. In this scenario, Industry Members must report this to [the Reference DatabaseCAIS](#) by:

1. Including in the Transformed Identifiers File:

- a. A record for the [CAT](#) Customer's *tidValue* that was generated from the original Input Identifier; and

- b. A record for the CAT Customer's *tidValue* that was generated from the new Input Identifier; and
2. Including in the CAIS-Reference Data File:
 - a. A record for the CAT Customer associated with the *tidValue* generated from the original Input Identifier, with a *roleEndReason* of 'OTHER' and a *roleEndDate* populated with the date the Input Identifier was changed by the Industry Member. The Customer-to-FDID association must be explicitly ended in the submission file and cannot be omitted; and
 - b. A new record for the CAT Customer associated with the *tidValue* generated from the subsequent Input Identifier value.

3.3. Mass Transfer of FDIDs across Industry Members

~~In the instance of Account transfers from one Industry Member to another resulting from a merger, acquisition, or divestiture, it is required by the CAT NMS Plan to have a means of linking the Accounts from the prior Industry Member to those of the new Industry Member. The Plan Processor must be able to link accounts that move from one Industry Member to another due to mergers and acquisitions, divestitures, and other events.~~ The transfer linking mechanisms described below are only to be used for instances of mass Account transfers. If assets or holdings of a single Account are transferred from one Industry Member to another, it is not required to report this as a Mass Transfer and as such the below guidance would not apply.

In order to enact mass transfers of Account records from one Industry Member to another, the transferring Industry Member must report the end of the FDID Record by setting the *fdidEndReason* as 'TRANSFER'.

The receiving Industry Member acquiring the Accounts must report in its submission file the *firmDesignatedID* it has assigned to the Account, the CRD of the transferring Industry Member as the *priorCATReporterCRD* value, and must also provide the FDID value assigned to the acquired Account by the transferring Industry Member as the *priorCATReporterFDID*.

3.4. Translation of Input Identifiers to TID Values

Social Security Numbers and Individual Taxpayer Identification Numbers **must not** be submitted in any of the fields in the Reference Data File. Additionally, foreign identifiers (other than Legal Entity Identifiers (LEIs)) **must not** be submitted in the Reference Data File. These Input Identifiers must be translated to TID values prior to submission to the Reference Database.

For each SSN/ITIN or EIN Input Identifier that is to be used to uniquely identify a single CAT Customer, the identifier must be input in the exact valid format, including the hyphen(s) – that is, 999-99-9999 for SSN or ITIN, and 99-9999999 for EIN – to a SHA-256 hashing algorithm.

For each foreign Input Identifier that is to be used to uniquely identify a single CAT Customer, prior to applying the SHA-256 hashing algorithm, Industry Members must:

- Remove spaces (leading, trailing, and kerning), hyphens, and/or other punctuation (e.g., colons, semi-colons) so that only the numeric or alphanumeric values are used as the Input Identifier value.
- Avoid affixing additional values (e.g., the *countryCode*) that do not appear on the documentation, as the *foreignTIDType* and *foreignTIDCountryCd* are separately reported in the Transformed Identifiers file.

The 32 bytes output from the SHA-256 hashing algorithm must be then represented as a 64-byte hexadecimal value. This resulting output is the TID value that must be reported to the Reference Database CAT CAIS in the *tidValue* field and will be treated as case-insensitive. It is the responsibility of the Industry Member to translate the Input Identifier to a TID. The Plan Processor will conduct validations against the submitted TIDs to ensure the Input Identifier used to generate the TID was in the appropriate format and is from a valid range for the identifier type, as follows:

1. For SSN and ITIN
 - a. No values having an Area Number (first three digits) of 000 nor 666.
 - b. No values having a Group Number (middle two digits) of 00.
 - c. No values having a Serial Number (last four digits) of 0000.
 - d. No values of all the same digit such as 000-00-0000, 111-11-1111, 333-33-3333, 666-66-6666, 999-99-9999, nor 123-45-6789.
2. For EIN
 - a. No range validation will occur for TIDs generated from EINs.
3. For Foreign
 - a. No range validation will occur for TIDs generated from foreign identifiers.

3.5. Translation of TID to CCID Values

Each valid and unique input TID reported to the Reference Database CAIS in the *tidValue* field will result in the generation of a cryptographically randomized CCID by the Plan Processor. This resulting CCID will be unique for the specific input TID and will be the resulting CCID each time the same TID is input for translation. The resulting CCID will not be returned to the Industry Member or its CAT Reporting Agent, will not be able to be reversed to the input TID, and is only used within the CAT to uniquely identify a single CAT Customer without storage of Input Identifiers.

~~3.6. Transition from LTID to Full Customer Reporting~~

~~The transition from LTID to Full Customer Reporting includes significant additions to the fields included on an FDID Record, as well as the addition of Customer to FDID associations and Customer Records.~~

~~For the LTID Phase, it was permissible to exclude optional or conditional fields previously submitted for an FDID or LTID, and no implicit update was made to these values stored in CAIS. If an Industry Member intended to clear a previously submitted value, they were required to use the paired NULL field. Since Industry Members are not permitted to view their record data as currently stored in CAIS, this raised concerns that the data could get out of alignment. To remove that concern in the Full Customer Reporting phase, when making any update to a previously accepted FDID Record (for any reason: repair, correct and update), the Industry Member is required to submit the entire FDID Record in its current state with all required LTID and Customer associations for each record within the file.~~

~~Industry Members are only required to include records in their submission for new Active Accounts or when changes occur to previously accepted Active Accounts, however each record present in the file must contain the current state of fields and associations of the record.~~

~~The sole exception to this requirement to include all current fields and associations is Customer associations that were previously stored, where the FDID is not included in the current submission but at least one of its associated Customers is included. In this event, the Customer to FDID associations for the FDIDs that are not included in the submission file will not be implicitly updated. For example:~~

- ~~• An initial submission file contains two FDIDs, FDID A and FDID B. FDID A has an association to Customer 1; FDID B has associations to Customer 1 and Customer 2.~~
- ~~• A subsequent submission file contains only FDID B and only contains an association to Customer 2.~~
- ~~• In this event, the association from FDID B to Customer 1 is implicitly ended; however, the association from FDID A to Customer 1 is not implicitly ended because FDID A is not included in the submission file.~~

~~3.7.3.6. Full Data Replacement Submission~~

~~If an Industry Member determines it must end all FDID Records submitted to [the Reference Database CAT CAIS](#) and would like the Plan Processor to end them on its behalf, it must contact the FINRA CAT Helpdesk.~~

3.8-3.7. Periodic Customer & Account ~~Reference Data Information~~ Refresh

In accordance with the CAT NMS Plan requirements, it is necessary for Industry Members to periodically refresh the Customer and Account ~~reference data~~ information captured in ~~the Reference Database~~ CAIS by resubmitting previously accepted records. Any FDID Record that is active, that is, has no set *fdidEndDate* or has an *fdidEndDate* set to a date greater than the current calendar date, must be submitted to and accepted into ~~the Reference Database~~ CAIS no less often than every 12 calendar month period. Because the FDID Record must be submitted with the full current ~~reference~~ data and its associated CAT Customers, this will also result in refreshing the associated CAT Customer ~~reference~~ data on the same frequency. If an Industry Member submits an FDID Record prior to the refresh deadline, and it is accepted into ~~the Reference Database~~ CAIS, the 12 calendar month period will be reset from the date of the submission.

~~An~~The FDID Refresh Report ~~will~~ contains a list of the Industry Member's active FDIDs that were last accepted at least 11 calendar months prior to the month of the report. To satisfy the periodic refresh requirement, Industry Members must submit to ~~the Reference Database~~ CAIS each FDID on the monthly FDID Refresh Report (with all associated LTIDs and ~~CAT~~ Customers) without data validation errors. Any FDIDs that are subsequently accepted into ~~the Reference Database~~ CAIS will be removed from the subsequent report and the refresh deadline will be reset for those FDID Records. If the FDID is not submitted to ~~the Reference Database~~ CAIS, or is submitted to ~~the Reference Database~~ CAIS and is rejected, it will remain on the FDID Refresh Report until such time that it is either ended or is accepted into ~~the Reference Database~~ CAIS successfully. FDIDs that are not refreshed on or earlier than midnight Eastern Time on the last day of the 12 calendar month period will be included in the ~~CAIS-Reference Database~~ Report Cards as records overdue for refresh.

Report Cards for a given month are generated at the end of the fifth processing day of the following month and published on the 15th calendar day of the following month.

In light of the proposed amendment to the CAT NMS Plan regarding ~~CAIS-Reference Database~~ reporting requirements (~~see Securities Exchange Act Rel. No. 102665 (https://www.govinfo.gov/content/pkg/FR-2025-03-19/pdf/2025-04516.pdf)~~), compliance with the Periodic Customer & Account ~~Information Reference Data~~ Refresh has been delayed to a future to-be-determined date. Accordingly, although the FDID Refresh Report ~~will be~~ delivered each month in the Production Environment for testing purposes and unrefreshed FDIDs may display a Refresh Due Date in the past and a Status of OVERDUE, these FDID Refresh Reports are being delivered ahead of compliance with the first Periodic Customer & Account ~~Information-Reference Data~~ Refresh requirement (which, as noted above, has been delayed to a future to-be-determined date). Accordingly, these FDIDs are not subject to the compliance requirement for the Periodic Customer & Account ~~Information-Reference Data~~ Refresh until further notice.

The FDID Refresh Report ~~is will be made~~ available via SFTP and the CAT Reference Database Reporter Portal ~~–CAIS~~ no later than 5:00 p.m. Eastern Time on the third CAT Trading Day of each month.

If an FDID Record remains active in the Reference DatabaseCAIS but has had no CAT-reportable activity within the prior six-month period, the Industry Member has the option, but is not obligated to, inactivate it in the Reference DatabaseCAIS by reporting an *fdidEndReason* of 'INACTIVE'. An *fdidEndReason* of 'INACTIVE' indicates that the FDID is not in scope for the periodic refresh requirement and it will not appear on the FDID Refresh Report. In addition, FDIDs with an *fdidEndReason* of 'INACTIVE' are not required to be updated in the Reference DatabaseCAIS when Account or CAT Customer changes occur. However, if the inactivated FDID subsequently has any CAT-reportable events reported to the Transaction database, the Industry Member must reactivate the FDID in the Reference DatabaseCAIS by the ~~CAIS~~ reporting deadline or else there may be linkage errors on the Transaction events. Reactivating the FDID is accomplished by resubmitting the entire FDID Record in its current state (with all required LTID and CAT Customer associations) with null values for the *fdidEndDate* and *fdidEndReason* fields or by omitting the *fdidEndDate* and *fdidEndReason* fields from the reactivating submission.

In addition, when *fdidEndReason* is populated with 'INACTIVE', the *fdidEndDate* and *fdidEndReason* will be cascaded as the *roleEndDate* and *roleEndReason*; and cascaded as the *ltidEndDate* and *ltidEndReason* (if applicable). Thus, Customer Records associated to FDID Records that are optionally marked as 'INACTIVE' will not be included in the Material Inconsistency checks.

(To Be Updated at a Future Date) Table 4: Periodic Refresh Examples

FDID Last Accepted	First Included in FDID Refresh Report	Due for FDID Refresh	First Included as Overdue in Report Card for Month Of

The following additional rules apply to the FDID Refresh Report files:

1. FDID Refresh Report files ~~will be are~~ accessible via the Reference DatabaseCAT Reporter Portal ~~–CAIS~~ and under the submitterID/cat/cais/reports directory.
2. The FDID Refresh Report files ~~will be are~~ delivered to the CAT Submitter and the CAT Reporter CRD.

3. The FDID Refresh Report files ~~will~~ include a metadata and data file set. The data file ~~will~~ includes details about the FDID Records requiring a refresh and the metadata file ~~will~~ includes the count of FDID Records requiring a refresh contained within the data file.
4. A set(s) of metadata file and data file ~~will be~~ delivered for each combination of CAT Submitter, CAT Reporter CRD and Correspondent CRD.
5. The FDID Refresh Report Data File ~~will be~~ limited to 400,000 FDID Records. If the *catReporterCRD* and *correspondentCRD* combination exceeds 400,000 records, an additional set(s) of metadata and data files will be delivered.
6. The FDID Refresh Report Data File ~~will~~ includes active FDIDs (i.e., no set *fdidEndDate* or has an *fdidEndDate* set to a date greater than the date that the report was run) that were last accepted at least 11 calendar months prior to the month of the report.
7. A sentinel file will be posted to the SFTP directory to indicate that the FDID Refresh Reports operation ran successfully and is complete. The sentinel file will be empty.
8. If there are no FDID Records requiring a refresh, only a sentinel file will be posted to the SFTP folder to indicate the operation ran successfully but did not produce any results.

FDID Refresh Report Metadata Files will be named using the following format:

<CAT Submitter ID>_<CAT Reporter CRD>_<Correspondent CRD>_<File Generation Date>_<FDIDREFRESHREPORT>_<Group>_<File Type>.<Format Extension>

Example: 123_456_2_20250403_ FDIDREFRESHREPORT_000001_meta.json

FDID Refresh Report Data Files will be named using the following format:

<CAT Submitter ID>_<CAT Reporter CRD>_<Correspondent CRD>_<File Generation Date>_<FDIDREFRESHREPORT>_<Group>_<File Type>.<Format Extension>.<Compression Extension>

Example: 123_456_2_20250403_ FDIDREFRESHREPORT_000001_data.json.bz2

Sentinel FDID Refresh Report files will be named using the following format:

<File Generation Date>_FDIDREFRESHREPORT_processed

Example: 20250403_FDIDREFRESHREPORT_processed

Table 5: Elements of an FDID Refresh Report Metadata File

Field Name	Data Type	JSON Object	Include Key	Description
catSubmitterID	Unsigned	Main	R	The ID of the firm that submitted the FDID Record requiring a refresh to CAT.
catReporterCRD	Unsigned	Main	R	The CRD of the Industry Member for which the FDID Refresh Report was generated.
correspondentCRD	Unsigned	Main	C	The CRD number of the related introducing broker or correspondent firm whose customer and account data is kept on record at the Industry Member reporting to CAT. Only populated when <i>correspondentCRD</i> was populated in the submission file.
fdidRefreshCount	Unsigned	Main	R	The total count of FDID Records requiring a refresh.
refreshReportFilename	Text (100)	Main	R	Name of the corresponding FDID Refresh Report Data File.

Table 6: Elements of an FDID Refresh Report Data File

Field Name	Data Type	JSON Object	Include Key	Description
firmDesignatedID	Text (40)	Main	R	The <i>firmDesignatedID</i> , as submitted to the Reference DatabaseCAIS , of the record requiring a refresh.
lastAcceptedFilename	Text (100)	Main	R	The name of the ReferenceCAIS Data File containing the most recently accepted submission of the FDID Record requiring refresh.
refreshDueDate	Date	Main	R	Date that the FDID Record and all associated records are/were required to be accepted by the Reference DatabaseCAIS . Any FDID Records that are overdue for the refresh will retain the original <i>refreshDueDate</i> . Records requiring a refresh must be accepted by the Reference DatabaseCAIS no later than midnight Eastern Time on the due date.
status	Choice	Main	R	DUE - Indicates that the Refresh Due Date is upcoming. OVERDUE - Indicates that the Refresh Due Date has passed.

3.8.4.3.7.1. JSON Example for FDID Refresh Report

The following JSON example demonstrates the structure of an FDID Refresh Report Metadata file.

FDID Refresh Report Metadata Filename	123_456_2_20250403_FDIDREFRESHREPORT_000001_meta.json
FDID Refresh Report Metadata File Contents	{"catSubmitterID": 123, "catReporterCRD": 456, "correspondentCRD": 2, "fdidRefreshCount": 3, "refreshReportFilename": "123_456_2_20250403_FDIDREFRESHREPORT_000001_data.json.bz2"}

The following JSON example demonstrates the structure of an FDID Refresh Report Data file.

FDID Refresh Report Data Filename	123_456_2_20250403_FDIDREFRESHREPORT_000001_data.json.bz2
FDID Refresh Report Data File Contents	<pre>{"firmDesignatedID": "FDID123", "lastAcceptedFilename": "123_456_20230527_CAIS_000001_data.json.bz2", "refreshDueDate": 20250531, "status": "DUE"} {"firmDesignatedID": "A1ABFA", "lastAcceptedFilename": "123_456_20230115_CAIS_000001_data.json.bz2", "refreshDueDate": 20250531, "status": "DUE"} {"firmDesignatedID": "ABC123", "lastAcceptedFilename": "123_456_20230527_CAIS_000001_data.json.bz2", "refreshDueDate": 20250531, "status": "DUE"}</pre>

3.9.3.8. Reporting Multiple Versions of a CAT Customer

If an Industry Member has multiple versions of a CAT Customer (i.e., the natural person or legal entity has the same Input Identifier and therefore will be reported to [the Reference Database CAIS](#) with the same *tidValue* for each instance of the [CAT Customer](#)), it is permitted to include the CAT Customer within the same submission file, across multiple files submitted by the same CAT Submitter and across multiple files submitted by different CAT Submitters.

Multiple versions of the [CAT Customer](#) can be reported to [the Reference Database CAIS](#) within the same submission in two ways:

- In option 1, the [CAT Customer](#) is associated to multiple FDID Records in the [Reference CAIS Data File](#) with the same *customerRecordID* value and is only present once in the Transformed Identifiers File with a *customerRecordID* value matching the *customerRecordID* value in the [Reference CAIS Data File](#).

- In option 2, the CAT Customer is associated to multiple FDID Records in the ReferenceCAIS Data File with differing values for the *customerRecordID* and each instance of the *customerRecordID* is present in the Transformed Identifiers File. Note that if using this option, when a CAT Customer's *tidValue* is replaced with another *tidValue* using the *replacedByTID* functionality and multiple versions of the same CAT Customer are present within the paired file submission, all of the CAT Customer's original *tidValues* must also be replaced. Customer Records that do not have the appropriate "replacedBy" fields will return Warning Code 24911 (Missing or invalid *replacedByTID*).

See the "Multiple Versions of a CAT Customer Within a Submission File" section of the CAT Customer & Account Industry Member Reporting ScenariosReference Database Reporting Scenarios for more information.

~~The versions of the CAT Customers, however, must not contain differing values for the following fields or else all instances of the CAT Customer within the file will be rejected:~~

- ~~• Reporting a 'FOREIGN' *tidType* record as both Natural Person and Legal Entity Customer Record types~~
- ~~• *yearOfBirth* (Natural Person Customers only)~~
- ~~• *ein* (Legal Entity Customers only)~~

~~When submitting multiple versions of the CAT Customer within the same file, the versions of the CAT Customer reported with a 'FOREIGN' *tidType* must not be reported as both a Natural Person and a Legal Entity CAT Customer or else all instances of the CAT Customer within the file will be rejected.~~

~~When submitting multiple versions of the CAT Customer across different files, the versions of the CAT Customers must not contain differing values for the following fields or else an intrafirm Material Inconsistency will be generated for the CAT Customer:~~

- ~~• reported with a 'FOREIGN' *tidType* record must not be reported as both a Natural Person and a Legal Entity CAT Customer or else an intrafirm Material Inconsistency will be generated for the CAT Customer. Record types~~
 - ~~• *yearOfBirth* (Natural Person Customers only)~~

- ~~• *ein* (Legal Entity Customers only⁴)~~

Thus, Industry Members using multiple CAT Submitters must ensure consistency on *yearOfBirth*, ~~*ein* (see footnote 4)~~ and foreign Customer Record type when reporting multiple versions of a CAT Customer across submitters.

~~The data stored in CAIS will consist of the merged set of entries across the submitted versions of the CAT Customer. For example, if the CAT Customer is reported in association to three FDID Records, and each time it is reported with different values in the *firstName* field, each of the name values will be stored in CAIS.~~

~~3.10. Tracking of Historical CAT Customer Names~~

~~To support regulatory understanding of historical CAT Customer Records, previously reported names of the CAT Customer will be retained in association to the currently submitted state of the record, even when the name value is not included in a subsequent submission of the CAT Customer Record.~~

~~3.11.3.9. Special Rules Regarding FDID Characters~~

The following are rules regarding specific handling of characters used to generate FDIDs:

- A *firmDesignatedID* reported with the value 'PENDING', regardless of case, will be rejected. The value of 'PENDING' is used in CAT Transaction reporting when a *firmDesignatedID* is required for the event, but not available at the time of reporting; however, the value is not valid for reporting to the Reference Database~~CAIS~~. Once a *firmDesignatedID* has been assigned by the Industry Member, it must be reported to the Reference Database~~CAIS~~.
- Inclusion of any of the following character combinations in the *firmDesignatedID* field will result in rejection of the *firmDesignatedID* due to JSON data parsing rules unless the backslash is properly escaped:
 - \b
 - \r
 - \f
 - \n
 - \t
 - \"

⁴Please see the Full CAIS Industry Member Release Rollout for the Release Dates regarding the disabling of Inconsistency Code 30003 and 40003.

- A backslash that is followed by any character other than the ones noted above, will result in the file having an Integrity Error for invalid JSON, unless the backslash is properly escaped.
- As an example of a properly escaped backslash, if an Industry Member has a *firmDesignatedID* of '1234\ABCD', it would be required to report this to [the Reference DatabaseCAIS](#) as '1234\\ABCD'.
- Leading and trailing spaces in the *firmDesignatedID* field will be removed during processing, and the string between them will be stored in [the Reference DatabaseCAIS](#). Spaces bounded by other characters within the *firmDesignatedID* field string will be retained.
- A *firmDesignatedID* that consists of only spaces will be rejected.

3.12.3.10. Special Rules Regarding Natural Person CAT Customer Names

~~To facilitate reporting of correct Customer names as required by the CAT NMS Plan, the Technical Specifications require Natural Person first and last names to be reported in two separate fields, *firstName* and *lastName*, respectively. Accordingly, if either the *firstName* or *lastName* fields for Natural Person Customers are not populated, the Customer Record will be rejected.~~

Per the CAT NMS Plan approved on January 13, 2026, the requirement that Industry Members report CAT Customer names was eliminated. To allow Industry Members and the Plan Processor time to update code to conform with the updated reporting requirements, some previously required fields, including *firstName* and *lastName* can be optionally reported for a limited time. Note that in Phase 1B, the *firstName* and *lastName* fields will be removed from the schema and will result in a rejection if submitted. See CAT Alert 2026-01 for more information.

The below guidance only applies for Industry Members that optionally report the *firstName* and *lastName* fields during this limited time:

In the scenario where the CAT Customer only has a single legal name (i.e., a first name but no last name, or a last name but no first name):

- If an Industry Member stores a single name value for its customer who legally has one name, it must may populate the *lastName* field with the name recorded in its books and records and populate the *firstName* field with a value of 'NNVE' (No Name Value Exists).
- If the Industry Member stores the legal name as both the first name and the last name (perhaps, due to system requirements), the Industry Member may report the customer as described above or may populate the stored values in the respective *firstName* field and *lastName* fields.

~~Note that effective June 13, 2023, use of 'UNPARSED' is not allowed. An "Unparsed Names" report is available upon request to the FINRA CAT Helpdesk.~~

3.13.3.11. Special Rules Regarding Natural Person Authorized Traders

To facilitate assignment of the unique CCID as required by the CAT NMS Plan, the Technical Specification requires Natural Person CAT Customers to be reported with all required data elements, including a *tidValue*. Accordingly, if the *tidValue* and other required data elements for a Natural Person CAT Customer are not populated, the Customer Record will be rejected.

If an Industry Member has systematized all data elements required to report a Natural Person that has authority to trade on an Account ("Natural Person Authorized Trader"), it must report all information-data elements required for a complete Customer Record.

Per the CAT NMS Plan approved on January 13, 2026, the requirement that Industry Members report CAT Customer names, including Authorized Trader names, was eliminated. To allow Industry Members and the Plan Processor time to update code to conform with the updated reporting requirements, some previously conditionally required fields, including *authTraderNamesList*, *authTraderNameID* and *authTraderName*, can be optionally reported for a limited time. Note that in Phase 1B, the *authTraderNamesList*, *authTraderNameID* and *authTraderName* fields will be removed from the schema and will result in a rejection if submitted. See CAT Alert 2026-01 for more information.

The below guidance only applies for Industry Members that optionally report the *authTraderNamesList*, *authTraderNameID* and *authTraderName* fields during this limited time:

~~However, if~~ an Industry Member has not historically collected and systematized all data required to report a Natural Person Authorized Trader, the Plan Participants have temporarily made available an Authorized Trader Names List on the FDID Record. The Authorized Trader Names List will enable the Industry Member to report only the name of the Natural Person Authorized Trader, where it does not have all data elements required to report a full Customer Record for the Authorized Trader. Use of the Authorized Trader Names List is not available for account holders; account holders must be reported to the Reference DatabaseCAIS in a full Customer Record. Each FDID Record submitted must still have at least one active association to a CAT Customer reported with a *tidValue* and all required data elements, with trading capabilities. See [FAQ Q68](#) for the reporting requirements-guidance when the Authorized Trader is a government employee of a U.S. state, county or municipality and acting in the capacity of a guardian or conservator for a minor or incapacitated person, and the government employee Authorized Trader does not provide a year of birth or Input Identifier (such as a social security number).~~If the Industry Member has stored the name of the Natural Person Authorized Trader as a single string, it must include the name string as stored in its system. If the Industry Member has stored the name of the Natural Person~~

~~Authorized Trader as multiple fields, it must report the name as a concatenated string in First/Middle/Last/Suffix order. A single whitespace character must be included between each field value. For example, a name captured as:~~

- ~~• First Name: John~~
- ~~• Middle Name: William~~
- ~~• Last Name: Doe~~

~~Must be reported as "John William Doe".~~

~~Use of the Authorized Trader Names List is only allowable on a temporary basis and, with sufficient time and notice, will be retired from the Full CAIS Technical Specifications at a future date. Thus, Industry Members will be required to resubmit the FDID Record to CAIS with all required data for a full Customer Record by or before that future date.~~

3.14.3.12. Special Rules for Clearing Firms

Clearing firms reporting FDID Records for accounts held for their introducing brokers/correspondents must follow the [Reference Database Full CAIS](#) reporting requirements outlined in [Section 2.2.5 – Input Identifiers](#).

However, due to the nature of the clearing firm's relationship with the customer:

- When reporting the Account held for an introducing broker/correspondent, clearing firms may report [CAT](#) Customer Input Identifiers as received from the introducing broker/correspondent. Therefore, if the clearing firm has multiple versions of a foreign CAT Customer that it received from different introducing brokers/correspondents that may have each used different foreign Input Identifiers, the clearing firm is not required to reconcile the CAT Customer to a single Input Identifier when reporting the clearing firm's version of the [CAT](#) Customer to support its allocation reporting obligations.
- Per [FAQ Q62](#), when reporting its version of the Customer Record, the clearing firm may replicate the field value for certain required data elements as provided by its introducing broker/correspondent. Specifically, when the *correspondentCRD* field is populated:
 - The clearing firm may report a *role* of 'AUTHREP' for an Authorized Trader rather than "flipping" the *role* to 'AUTH3RD' on the clearing firm's version of the Customer Record.
 - The clearing firm may report a *customerType* of 'EMPLOYEE' rather than "flipping" the *customerType* to 'OTHBKR' on the clearing firm's version of the Customer Record.

See [FAQ Q64](#) for information regarding how clearing firms must populate the *accountType* field when it is optionally reporting allocations to an account that is owned or controlled by an introducing broker/correspondent.

When reporting the Account held for an introducing broker/correspondent, clearing firms are not required to populate the *branchOfficeCRD* field. While the *registeredRepCRD* is an optionally reported field, it is likewise not expected for clearing firms reporting data for their introducing broker/correspondents to populate this field.

3.13. Special Rules for Addresses

Per the CAT NMS Plan approved on January 13, 2026, the requirement that Industry Members report an address(es) on the FDID Record and the Customer Record was eliminated. To allow Industry Members and the Plan Processor time to update code to conform with the updated reporting requirements, some previously required or conditionally required fields, including *addressList*, *addrType*, *addrLine1*, *city*, *regionCode*, *countryCode* and *postalCode* can be optionally reported for a limited time. Note that in Phase 1B, *addressList* and all fields within the *addressList* multi-dimensional array will be removed from the schema and will result in a rejection if submitted. See CAT Alert 2026-01 for more information.

The below guidance only applies for Industry Members that optionally report addresses during this limited time:

- The Reference Database allows for four address lines of up to 40 characters per line, or 160 total characters for each FDID or CAT Customer address. Address lines exceeding 40 characters may be continued to the next address line. Industry Members are not expected to use specific abbreviations or standardization (e.g., “ST” or “ST.” for “Street”), or white space trimming when submitting the address information to the Reference Database.
- If an Address Record is a United States military or diplomatic address, the *countryCode* field may be populated with ‘US’ and the *regionCode* may be populated with ‘US-AA’, ‘US-AE’, or ‘US-AP’, as applicable. The *city* field may be populated with ‘APO’, ‘DPO’, or ‘FPO’, as applicable.

4. CAIS Reference Database Reporting

This section describes the fields for inclusion within the [Reference Database CAIS](#) submission files. All submissions to [the Reference Database CAIS](#) are required to be in UTF-8 encoding. [Table 8](#) and [Table 9](#) list each field in JSON naming convention, as well as corresponding Data Types, Include Key, acceptable Occurrences, Description, and Format or Accepted Values for a Choice-type field. A single submission to [the Reference Database CAIS](#) will require a paired set of a [Reference CAIS](#) Data File and a Transformed Identifiers File, as defined in [Section 5.1 – File Submissions and Data Formats](#).

4.1. CAIS Reference Data File

The [Reference CAIS](#) Data File contains the list of FDID Records and associated [reference](#) data, the core [CAT](#) Customer [reference](#) data fields excluding TID data, and the relationships between the two. For security considerations, [Reference CAIS](#) Data Files must not contain the TID data; this is to be provided in the Transformed Identifiers File. A single [Reference CAIS](#) Data File is to be submitted in a pairing with a single Transformed Identifiers File.

[On January 13, 2026, the SEC approved an amendment \(“the Amendment”\) to the CAT NMS Plan relating to the Reference Database. The Amendment eliminates requirements that Industry Members report Customer names, Customer addresses, account names, account addresses, years of birth, authorized trader names and Employer Identification Numbers \(“EINs”\); and eliminates the requirements relating to the handling of inconsistencies. These reporting changes will be implemented in two phases. Phase 1A allows the continued acceptance of submissions from Industry Members and CAT Reporting Agents that include names, addresses, years of birth, EINs and reporting the *updateNotification* field \(relating to the handling of inconsistencies\), but such information will not be processed. In Phase 1B, any submissions from Industry Members and CAT Reporting Agents that continue to include names, addresses, years of birth, EINs and the *updateNotification* field will be rejected. See CAT Alert 2026-01 for more information.](#)

Table 7: [Reference CAIS](#) Data File

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
<i>version</i>	Text (10)	Main	R	Exactly One per submission file	The <i>version</i> of the Reference CAIS Data File Schema under which the data is reported. In Phase 1A , the <i>version</i> utilized for Reference Database full Customer and Account reporting is 2.0.0. Effective in Phase 1B ,	2.0.0

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					version must be set to '1.0.0' for Reference Data Files or else the file will be rejected.	
<i>catReporterCRD</i>	Unsigned	Main	R	Exactly One per submission file	The CRD number assigned to the Industry Member to which the data within the file belongs.	
<i>catSubmitterID</i>	Unsigned	Main	R	Exactly One per submission file	The ID of the firm submitting the file to CAT. Required even when the Industry Member is submitting data for itself.	
<i>correspondentCRD</i>	Unsigned	Main	C	Zero or One per submission file	The CRD number of the related introducing broker or correspondent firm whose customer and account data is kept on record at the Industry Member reporting to CAT. Required to be populated by clearing firms with introducing brokers or correspondents when reporting Accounts to the Reference DatabaseCATS that are custodied for their introducing brokers/correspondents, including, DVP/RVP accounts. All FDID and CAT Customer reference data included in the file will be associated to the <i>catReporterCRD</i> and <i>correspondentCRD</i> pairing.	
<i>fdidRecordCount</i>	Unsigned	Main	R	Exactly One per submission file	The count of <i>firmDesignatedID</i> field occurrences within the file. Used to validate the count of FDID Records intended to be submitted within the file matches the count of records present in the file.	
<i>naturalPersonCustomerRecordCount</i>	Unsigned	Main	R	Exactly One per submission file	The count of <i>customerRecordID</i> field occurrences within the file for Natural Person type CAT Customers. Used to validate the count of Natural Person Customer Records intended to be submitted within the file matches the count of records present in the file.	
<i>legalEntityCustomerRecordCount</i>	Unsigned	Main	R	Exactly One per	The count of <i>customerRecordID</i> field	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
				submission file	occurrences within the file for Legal Entity type CAT Customers. Used to validate the count of Legal Entity Customer Records intended to be submitted within the file matches the count of records present in the file.	
<i>fdidRecordList</i>	Multi-Dimensional Array	Main	C	Zero or One per submission file	Structure for the array of FDID Records that are included in the file. Required if the submission file contains one or more FDID Records; not required if no FDID Records are included in the file.	
<i>fdidRecordID</i>	Unsigned	FDID Record	R	Exactly One per FDID Record	A unique reference to a single FDID Record for a single submission file.	
<i>firmDesignatedID</i>	Text (40)	FDID Record	R	Exactly One per FDID Record	The Firm Designated ID of the 'ACCOUNT', 'RELATIONSHIP', or 'ENTITYID' being reported by the Industry Member.	
<i>fdidType</i>	Choice	FDID Record	R	Exactly One per FDID Record	Representation of the type of record of the reported FDID. Values: ACCOUNT – Account type record. RELATIONSHIP – Relationship type record. ENTITYID – Entity ID type record. Only allowable when the FDID represents the Entity ID of the firm when an employee of the firm is exercising discretion over multiple customer accounts.	"ACCOUNT" "RELATIONSHIP" "ENTITYID"
<i>accountType</i>	Array [Choice]	FDID Record	R	Exactly One per FDID Record	Representation of the type or types of Account the FDID represents. All applicable values for the FDID must be included in the array. All values included in the array must be separated by commas. Values: AVERAGE – Industry Member-owned average price account. DVP/RVP – Delivery versus Payment account/Receipt	"AVERAGE" "DVP/RVP" "EDUCATION" "ENTITYID" "ERROR" "FIRM" "INSTITUTION" "MARKET" "MARGIN" "OPTION" "OTHER" "RELATIONSHIP"

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p>versus Payment account.</p> <p>EDUCATION – Established for education savings including 529 Plan or Coverdale ESA.</p> <p>ENTITYID – Entity ID type record. Only allowable when the FDID represents the Entity ID of the firm when an employee of the firm is exercising discretion over multiple CAT Customer Accounts.</p> <p>ERROR – Error account.</p> <p>FIRM – Is owned by the reporting firm, including proprietary trading accounts and inventory accounts.</p> <p>INSTITUTION – An institutional account as defined in FINRA Rule 4512(c).</p> <p>MARKET – Market Making Account from which the Industry Member originates orders or to which it allocates shares/contracts in a security/securities for which the Industry Member is registered as a market maker, designated market maker, lead market maker or similar capacity on a national securities exchange or from which the Industry Member originates orders that clear in the OCC clearing range of 'M'. If the Industry Member reports New Order events with an <i>accountHolderType</i> of 'O', the <i>accountType</i> value of 'MARKET' must be included on the related FDID Record submitted to the Reference DatabaseCAIS. See FAQ C5 for more information.</p> <p>MARGIN – Approved for trading on margin.</p> <p>OPTION – Approved for trading options.</p> <p>OTHER – Account which does not meet the criteria for any other listed value.</p> <p>RELATIONSHIP – Relationship type record.</p> <p>RETIREMENT – As defined by the IRS:</p>	<p>”</p> <p>“RETIREMENT”</p> <p>“UGMA/UTMA”</p>

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<ul style="list-style-type: none"> • Individual Retirement Arrangements (IRAs) • Roth IRAs • 401(k) Plans • 403(b) Plans • SIMPLE IRA Plans (Savings Incentive Match Plans for Employees) • SEP Plans (Simplified Employee Pension) • SARSEP Plans (Salary Reduction Simplified Employee Pension) • Payroll Deduction IRAs • Profit-Sharing Plans • Defined Benefit Plans • Money Purchase Plans • Employee Stock Ownership Plans (ESOPs) • Governmental Plans • 457 Plans UGMA/UTMA – Established as a custodial account under the Uniform Gift to Minors Act or Uniform Transfer to Minors Act.	
<i>accountName</i>	Extended Text (200)	FDID Record	<u>OR</u>	Exactly One per FDID Record	The name applied to the 'ACCOUNT', 'RELATIONSHIP', or 'ENTITYID' at the Industry Member. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>DVPCustodianID</i>	Array [Alphanumeric (5)]	FDID Record	C	Zero or One per FDID Record	Required when <i>accountType</i> includes 'DVP/RVP'. All values included in the array must be separated by commas. Each value must be five characters or fewer, including leading zeros. If the custodian is a U.S. broker-dealer, this field must be populated with the clearing number of the custodian. If the custodian is a bank and is not a registered broker-dealer, this field must be populated with the DTC number of the bank.	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					See FAQ Q66 for acceptable uses of the value 'DTCRM'. If there is no clearing number or DTC number because the custodian is foreign, this field must be populated with a value of 'FOR'.	
<i>clearingBrokerID</i>	Array [Alphanumeric (4)]	FDID Record	C	Zero or One per FDID Record	The NSCC Clearing ID of the Industry Member that clears the Accounts. Must be populated if known to the Industry Member. All values included in the array must be separated by commas. Each value must be exactly four characters, including leading zeros. If the Industry Member is a self-clearing firm, it must report its own NSCC Clearing ID.	
<i>branchOfficeCRD</i>	Unsigned	FDID Record	C	Zero or One per FDID Record	The CRD for the branch office to which the FDID Record is assigned, if applicable. Required if a customer Account is assigned to a branch office other than the main office.	
<i>registeredRepCRD</i>	Array [Unsigned]	FDID Record	O	Zero or One per FDID Record	The CRD number assigned to the Registered Representative(s) responsible for the FDID Record (as identified as such per SEC Rule 17a-3) that can provide trading advice for the Account. When optionally reported, all CRDs included in the array must be only numeric values, must not contain any leading zeroes, and must be separated by commas.	
<i>fdidDate</i>	Date (Number) (8)	FDID Record	R	Exactly One per FDID Record	Date on which the FDID opened, as defined in Section 2.2.3 of this specification, in YYYYMMDD format.	YYYYMMDD
<i>fdidEndDate</i>	Date (Number) (8)	FDID Record	C	Zero or One per FDID Record	Date on which the FDID was closed or ended, in YYYYMMDD format. Must be provided if the <i>fdidEndReason</i> field is populated.	YYYYMMDD
<i>fdidEndReason</i>	Choice	FDID	C	Zero or One	Reason why the FDID was	"CORRECTION"

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
		Record		per FDID Record	<p>closed or ended. Must be provided if the <i>fdidEndDate</i> field is populated.</p> <p>Values:</p> <p>CORRECTION – FDID was not required to be reported to the Reference DatabaseCAIS.</p> <p>ENDED – FDID was ended (e.g., account was closed).</p> <p>INACTIVE – Indicates the FDID has had no CAT-reportable transaction activity associated with the FDID in the prior six months.</p> <p>REPLACED – FDID replaced by another FDID within the Industry Member. See FAQ M16 regarding FDID replacements.</p> <p>OTHER – Other unlisted reason for ending the FDID.</p> <p>TRANSFER - FDID was transferred to another Industry Member as part of a mass transfer as described in Section 3.3.</p>	<p>“ENDED”</p> <p>“INACTIVE”</p> <p>“REPLACED”</p> <p>“OTHER”</p> <p>“TRANSFER”</p>
<i>replacedByFDID</i>	Text (40)	FDID Record	C	Zero or One per FDID Record	The new <i>firmDesignatedID</i> replacing the currently reported <i>firmDesignatedID</i> . Used to provide historical linkage across replaced records over time. Must be provided if the <i>fdidEndReason</i> is ‘REPLACED’. Must not be provided if the <i>fdidEndReason</i> is any value other than ‘REPLACED’.	
<i>priorCATReporterCRD</i>	Unsigned	FDID Record	C	Zero or One per FDID Record	CRD of the Industry Member from which the Account was acquired as part of a mass transfer as described in Section 3.3 . Must be provided if the Account was acquired by the Industry Member. Must be provided if <i>priorCATReporterFDID</i> is populated.	
<i>priorCATReporterFDID</i>	Text (40)	FDID Record	C	Zero or One per FDID Record	The original <i>firmDesignatedID</i> for the record acquired as part of a mass transfer as described in Section 3.3 . Must be provided by the acquiring	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					Industry Member if the Account was acquired as part of a mass transfer.	
<i>addressList</i>	Multi-Dimensional Array	FDID Record	<u>OR</u>	Exactly One per FDID Record	Structure for the array of Address Records that are associated to the FDID Record within the file. At a minimum, an 'ADDRESS1' record populated with the mailing address associated to the FDID must be included for each FDID Record within the file. Additional addresses may be included for the FDID if available within the Industry Member's system. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>addrType</i>	Choice	Address Record	<u>OR</u>	Exactly One per Address Record	The type of the Address Record. Values: ADDRESS1—The mailing Address Record of the FDID. ADDRESS2—The second Address Record of the FDID. ADDRESS3—The third Address Record of the FDID. ADDRESS4—The fourth Address Record of the FDID. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	<u>May optionally be populated with values including:</u> "ADDRESS1" "ADDRESS2" "ADDRESS3" "ADDRESS4"
<i>addrLine1</i>	Extended Text (40)	Address Record	<u>OR</u>	Exactly One per Address Record	The first Address Line for the Address Record. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
<i>addrLine2</i>	Extended Text (40)	Address Record	O	Zero or One per Address Record	Additional space for Address Line. Must not be provided if <i>addrLine1</i> is not provided. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>addrLine3</i>	Extended Text (40)	Address Record	O	Zero or One per Address Record	Additional space for Address Line. Must not be provided if <i>addrLine2</i> is not provided. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>addrLine4</i>	Extended Text (40)	Address Record	O	Zero or One per Address Record	Additional space for Address Line. Must not be provided if <i>addrLine2</i> and <i>addrLine3</i> are not provided. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>city</i>	Extended Text (100)	Address Record	<u>RO</u>	Exactly One per Address Record	City of the address. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>regionCode</i>	Extended Text (40)	Address Record	<u>EO</u>	Zero or One per Address Record	Code of the local region of the address. Required if the <i>countryCode</i> is 'US' or 'CA' and must be provided in ISO 3166-2 format. Please view Appendix E for acceptable values. For all other <i>countryCodes</i>, the <i>regionCode</i> must be provided in text format if known to the Industry Member.	AA-XX* *Format when <i>countryCode</i> is 'US' or 'CA'

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>countryCode</i>	Choice	Address Record	RO	Exactly One per Address Record	Code of the country of the address, in ISO 3166-1 alpha-2 format. Please view Appendix E for acceptable values. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	<u>May optionally be formatted as:</u> AA
<i>postalCode</i>	Text (15)	Address Record	CO	Zero or One per Address Record	Postal code of the address. Must be provided if postal codes exist for the country of the address. Please view Appendix E for acceptable formatting per country. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>largeTraderList</i>	Multi-Dimensional Array	FDID Record	C	Zero or One per FDID Record	Structure for the array of LTID and ULTID Records that are associated to the FDID Record within the file. Required if the submission file contains one or more LTID/ULTID Records associated to the FDID Record; not required if no LTID/ULTID Records are included in the file in association to the reported FDID Record.	
<i>largeTraderRecordID</i>	Unsigned	Large Trader Record	R	Exactly One per Large Trader Record	A unique reference to a single LTID or ULTID in reference to a single FDID Record for a single submission file.	
<i>largeTraderID</i>	Text (13)	Large Trader Record	R	Exactly One per Large Trader Record	The LTID or ULTID associated to the FDID in the Industry Member's system. For LTID Records,	For LTID – 99999999-9999 For ULTID –

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					the identifier must be eight numeric characters, followed by a dash, followed by four numeric characters. For ULTID Records, the identifier must start with 'ULT', followed by alphanumeric [0-9A-Z] characters for the fifth through eighth positions, followed by a dash, followed by four alphanumeric [0-9A-Z] characters.	ULTXXXXX-XXXX
<i>ltidEffectiveDate</i>	Date (Number) (8)	Large Trader Record	R	Exactly One per Large Trader Record	Date on which the LTID or ULTID became associated to the FDID within the Industry Member's system, in YYYYMMDD format.	YYYYMMDD
<i>ltidEndDate</i>	Date (Number) (8)	Large Trader Record	C	Zero or One per Large Trader Record	Date on which the LTID or ULTID was no longer associated to the FDID within the Industry Member's system, in YYYYMMDD format. Must be provided if the <i>ltidEndReason</i> field is populated.	YYYYMMDD
<i>ltidEndReason</i>	Choice	Large Trader Record	C	Zero or One per Large Trader Record	Reason why the LTID or ULTID was no longer associated to the FDID. Must be populated in order to end date an LTID-to-FDID association in the system. Must be provided if the <i>ltidEndDate</i> field is populated. Values: CORRECTION – LTID was erroneously reported as associated to the FDID or FDID was not required to be reported to the Reference DatabaseCAIS . ENDED – LTID-to-FDID association was ended. INACTIVE – Indicates the associated FDID has had no CAT-reportable transaction activity in the prior six months. REPLACED – LTID was replaced by a different LTID or the FDID was replaced by a different FDID. OTHER – Other unlisted reason for ending the LTID-	"CORRECTION" "ENDED" "INACTIVE" "REPLACED" "OTHER" "TRANSFER"

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					to-FDID association or per FAQ Q12 , the reason why an LTID-to-FDID association was ended could not be reasonably ascertained. TRANSFER – LTID association was ended because the FDID was transferred to another Industry Member as part of a mass transfer as described in Section 3.3 .	
<i>fdidCustomerList</i>	Multi-Dimensional Array	FDID Record	C	Exactly One per FDID Record	Structure for the array of Customer Records that are associated to the FDID Record within the file. Required when the FDID Record is being reported to the Reference DatabaseCAIS for the first time. Also required when there is no <i>fdidEndReason</i> . Not required when ending an FDID Record that was previously accepted with one or more CAT Customers.	
<i>customerRecordID</i>	Unsigned	FDID Customer Record	R	Exactly One per FDID Customer Record	A unique reference to a single CAT Customer for a single submission file. The value in this field must also be a value present in the <i>naturalPersonCustomerList</i> or the <i>legalEntityCustomerList</i> ; and present in the Transformed Identifiers File.	
<i>role</i>	Choice	FDID Customer Record	R	Exactly One per FDID Customer Record	Representation of the type of role the CAT Customer has on the FDID. Values: AUTH3RD – An Authorized Trader who is not a holder of the Account, nor an employee of the reporting Industry Member, who has authority to place orders for the Account without prior approval of the account holder(s). AUTHREP – An Authorized Trader who is not a holder of the Account but does have authority to place orders for the Account without prior approval of the account holder(s) and is	“AUTH3RD” “AUTHREP” “NTHOLDER” “TRDHOLDER”

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p>either the reporting Industry Member or an employee of the reporting Industry Member, if the account holder specifically designates the natural person employee as authorized to trade for the Account independent of the authority granted to the entity Authorized Trader. See FAQ Q56 for more information. This <i>role</i> must also be used for affiliated group companies (for Legal Entity CAT Customers) and employees of affiliated group companies (for Natural Person CAT Customers) (see FAQ Q56 for more information), if the Industry Member maintains in its books and records that the Legal Entity CAT Customer or Natural Person CAT Customer is an affiliate. For example, if the Industry Member maintains in its books and records that the Legal Entity Registered Investment Advisor Authorized Trader is affiliated with the reporting Industry Member, the <i>role</i> must be 'AUTHREP'. If the Industry Member does not maintain in its books and records that the Legal Entity Registered Investment Advisor Authorized Trader is affiliated with the reporting Industry Member, the <i>role</i> may be 'AUTH3RD'.</p> <p>NTHOLDER – Holder of the Account that does not have authorization to trade on the Account.</p> <p>TRDHOLDER – Holder of the Account that also has authorization to trade on the Account.</p>	
<i>hasDiscretion</i>	Boolean	FDID Customer Record	C	Zero or One per FDID Customer Record	Indicates if the Authorized Trader has the ability to place orders on the Account without prior approval of the Holder(s). Must be present and populated if <i>role</i> is 'AUTH3RD' or 'AUTHREP'.	true false

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					Must be omitted or 'false' if <i>role</i> is 'NTHOLDER' or 'TRDHOLDER'.	
<i>roleStartDate</i>	Date (Number) (8)	FDID Customer Record	R	Exactly One per FDID Customer Record	Date on which the CAT Customer entered into the specified <i>role</i> on the Account, in YYYYMMDD format.	YYYYMMDD
<i>roleEndDate</i>	Date (Number) (8)	FDID Customer Record	C	Zero or One per FDID Customer Record	Date on which the CAT Customer ceased having the specified <i>role</i> on the FDID, in YYYYMMDD format. Must be provided if the <i>roleEndReason</i> field is populated.	YYYYMMDD
<i>roleEndReason</i>	Choice	FDID Customer Record	C	Zero or One per FDID Customer Record	Reason why the CAT Customer ceased having the specified <i>role</i> on the FDID. Must be provided if the <i>roleEndDate</i> field is populated. Values: CORRECTION – CAT Customer was erroneously reported as associated to the FDID or FDID was not required to be reported to the Reference DatabaseCAIS . ENDED – CAT Customer was reported to the Reference DatabaseCAIS with an incorrect <i>role</i> (e.g., erroneously reported as 'AUTH3RD' rather than correctly reported as 'AUTHREP'), <i>role</i> on FDID was ended or FDID was ended (e.g., account was closed upon death of account holder). INACTIVE – Indicates the associated FDID has had no CAT-reportable transaction activity in the prior six months. REPLACED – CAT Customer <i>role</i> on FDID was ended because the FDID was replaced with another FDID, or because the CAT Customer Input Identifier was replaced with another Input Identifier. OTHER – Other unlisted reason for ending the CAT Customer <i>role</i> on FDID or	"CORRECTION" "ENDED" "INACTIVE" "REPLACED" "OTHER" "TRANSFER"

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					per FAQ Q12 , the reason why a Customer-to-FDID association was ended could not be reasonably ascertained. TRANSFER – Role ended because the FDID was transferred to another Industry Member as part of a mass transfer as described in Section 3.3 .	
<i>authTraderNamesList</i>	Multi-Dimensional Array	FDID Record	GO	Zero or One per FDID Customer Record	Structure for the array of Authorized Trader Names that are associated to the FDID Record within the file. Must only be used for Natural Person Authorized Traders where the Industry Member does not have all data required to report a full Natural Person Customer Record. Required when the FDID has one or more Authorized Traders for which the Industry Member does not have all data required to report a full Natural Person Customer Record. Not to be used if the Industry Member has all data required to report a full Customer Record for the Natural Person Authorized Trader. See Section 3.11 – Special Rules Regarding Natural Person Authorized Traders for more information. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>authTraderNameID</i>	Unsigned	Authorized Trader Name List	RO	Exactly One per Authorized Trader Name Record	A unique reference to a single Authorized Trader Name for a single FDID, for a single submission file. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
<i>authTraderName</i>	Extended Text (200)	Authorized Trader Name List	R <u>Q</u>	Exactly One per Authorized Trader Name Record	The name of the Natural Person who has authority to place order for the account. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>naturalPersonCustomerList</i>	Multi-Dimensional Array	Main	C	Zero or One per submission file	Structure for the array of Natural Person type Customer Records that are included in the file. Required if the submission file contains one or more Natural Person Customer Records. Not required if no Natural Person Customer Records are included in the file.	
<i>customerRecordID</i>	Unsigned	Natural Person Customer Record	R	Exactly One per Natural Person Customer Record	A unique reference to a single <u>CAT</u> Customer for a single submission file. The value in this field must also be a value present in the <i>fdidCustomerList</i> and present in the Transformed Identifiers File.	
<i>firstName</i>	Extended Text (40) Please see the <u>Full CAIS Industry Member Release Rollout for the Release Dates:</u> Extended Text (200)	Natural Person Customer Record	O <u>R</u>	Exactly One per Natural Person Customer Record	The First Name known for the <u>CAT</u> Customer. If the <u>CAT</u> Customer legally has one name, this field must <u>may optionally</u> be populated with 'NNVE' (No Name Value Exists). <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>middleName</i>	Extended Text (20) Please see the <u>Full CAIS Industry Member Release Rollout for the Release</u>	Natural Person Customer Record	O	Zero or One per Natural Person Customer Record	The Middle Name or initial known for the <u>CAT</u> Customer. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
	Dates: Extended Text (200)					
<i>lastName</i>	Extended Text (200)	Natural Person Customer Record	OR	Exactly One per Natural Person Customer Record	The Last Name known for the <u>CAT</u> Customer. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>nameSuffix</i>	Choice	Natural Person Customer Record	O	Zero or One per Natural Person Customer Record	The Name Suffix known for the <u>CAT</u> Customer. Values: FIFTH FOURTH JUNIOR SENIOR THIRD <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	<u>May optionally be populated with values including:</u> "FIFTH" "FOURTH" "JUNIOR" "SENIOR" "THIRD"
<i>doingBusinessAs</i>	Extended Text (200)	Natural Person Customer Record	OC	Zero or One per Natural Person Customer Record	The Doing Business As name for a sole proprietorship or other legal entity <u>CAT</u> Customer reported to <u>the Reference DatabaseCAIS</u> using SSN/ITIN as the Input Identifier, or for foreign <u>CAT</u> Customers, one of the Input Identifiers allowable for a foreign natural person. Must May be populated when reporting a CAT Customer as a Natural Person record that is a sole proprietorship, trust, or otherwise conducts business under a name other than the Natural Person's legal name. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a</u>	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<u>rejection if submitted.</u>	
<i>yearOfBirth</i>	Year (Number) (4)	Natural Person Customer Record	<u>OR</u>	Exactly One per Natural Person Customer Record	The Year of Birth known for the <u>CAT</u> Customer in YYYY format. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	YYYY
<i>addressList</i>	Multi-Dimensional Array	Natural Person Customer Record	<u>OR</u>	Zero or One per Natural Person Customer Record	Structure for the array of Address Records that are associated to the Customer Record within the file. An 'ADDRESS1' record must be included for the Customer Record. Additional addresses may be included for the <u>CAT</u> Customer if available within the Industry Member's system. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>addrType</i>	Choice	Address Record	<u>RO</u>	Exactly One per Address Record	The type of the Address Record. Values: ADDRESS1—The first Address Record of the Customer. ADDRESS2—The second Address Record of the Customer. ADDRESS3—The third Address Record of the Customer. ADDRESS4—The fourth Address Record of the Customer. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	<u>May optionally be populated with values including:</u> "ADDRESS1" "ADDRESS2" "ADDRESS3" "ADDRESS4"
<i>addrLine1</i>	Extended	Address	<u>RO</u>	Exactly One	The first Address Line for	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
	Text (40)	s Record		per Address Record	the a Address Record. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>addrLine2</i>	Extended Text (40)	Address Record	O	Zero or One per Address Record	Additional space for Address Line. Must not be provided if addrLine1 is not provided. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>addrLine3</i>	Extended Text (40)	Address Record	O	Zero or One per Address Record	Additional space for Address Line. Must not be provided if addrLine2 is not provided. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>addrLine4</i>	Extended Text (40)	Address Record	O	Zero or One per Address Record	Additional space for Address Line. Must not be provided if addrLine2 and addrLine3 are not provided. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>city</i>	Extended Text (100)	Address Record	R O	Exactly One per Address Record	City of the address. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>regionCode</i>	Extended	Address	E O	Zero or One	Code of the local region of	AA-XX*

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
	Text (40)	s Record		per Address Record	<p>the address. Required if the <i>countryCode</i> on the Customer Address Record is 'US' or 'CA' and must be provided in ISO 3166-2 format. For all other <i>countryCodes</i>, the <i>regionCode</i> must be provided in text format if known to the Industry Member.</p> <p><u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u></p>	<i>*Format when <i>countryCode</i> is 'US' or 'CA'</i>
<i>countryCode</i>	Choice	Address Record	RO	Exactly One per Address Record	<p>Code of the country of the address, in ISO 3166-1 alpha-2 format. Please view Appendix E for acceptable values.</p> <p><u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u></p>	<u>May optionally be formatted as:</u> AA
<i>postalCode</i>	Text (15)	Address Record	CO	Zero or One per Address Record	<p>Postal code of the address. Must be provided if postal codes exist for the country of the address. Please view Appendix E for acceptable formatting per country.</p> <p><u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u></p>	
<i>customerType</i>	Array [Choice]	Natural Person Customer Record	R	Exactly One per Natural Person Customer Record	<p>Representation of the characteristics of the CAT Customer. All applicable values for the CAT Customer must be included in the array. All values included in the array must be separated by commas.</p> <p>Values: ACCREDITED – CAT Customer was identified as</p>	"ACCREDITED" "ADVISER" "CP" "EMPLOYEE" "FOREIGN" "NOTAPPLICABLE" "OTHBKR" "TRUST"

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p>an accredited investor by the Industry Member as set forth in Rule 501(a) of the Securities Act of 1933, if maintained in the Industry Member's general customer and account records.</p> <p>ADVISER – <u>CAT</u> Customer was identified as being associated to a U.S. registered Investment Adviser, if maintained in the Industry Member's general customer and account records.</p> <p>CP – <u>CAT</u> Customer identified itself as an officer, director, or 10% or more share owner of a public company at the time of account opening.</p> <p>EMPLOYEE – <u>CAT</u> Customer is an employee or associated person of the Industry Member, as defined in Section 3(a)(18) of the Securities Exchange Act of 1934. If employee attribute is maintained by the Industry Member at the group level, this value may also include <u>CAT</u> Customers employed by affiliated group companies.</p> <p>FOREIGN – <u>CAT</u> Customer is a Natural Person that does not have a U.S. Tax Identifier.</p> <p>NOTAPPLICABLE – None of the defined terms are applicable to the <u>CAT</u> Customer.</p> <p>OTHBKR – <u>CAT</u> Customer is associated with a U.S. registered broker-dealer other than the Industry Member.</p> <p>TRUST – <u>CAT</u> Customer is a trust.</p>	
<i>updateNotification</i>	Boolean	Natural Person Customer Record	<u>OG</u>	Zero or One per Natural Person Customer Record	<p>Required-May be optionally populated as 'true' when the Customer Record is being reported to resolve a Material Inconsistency or is being reported with known updates to material fields.</p> <p><u>Per the January 13, 2026 SEC approval order, this</u></p>	true false

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<u>field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>legalEntityCustomerList</i>	Multi-Dimensional Array	Main	C	Zero or One per submission file	Structure for the array of Legal Entity type Customer Records that are included in the file. Required if the submission file contains one or more Legal Entity Customer Records; not required if no Legal Entity Customer Records are included in the file.	
<i>customerRecordID</i>	Unsigned	Legal Entity Customer Record	R	Exactly One per Legal Entity Customer Record	A unique reference to a single CAT Customer for a single submission file. The value in this field must also be a value present in the <i>fdidCustomerList</i> and present in the Transformed Identifiers File.	
<i>legalName</i>	Extended Text (200)	Legal Entity Customer Record	OR	Exactly One per Legal Entity Customer Record	The Legal Name known for the CAT Customer. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>addressList</i>	Multi-Dimensional Array	Legal Entity Customer Record	OR	Zero or One per Legal Entity Customer Record	Structure for the array of Address Records that are associated to the Customer Record within the file. An 'ADDRESS1' record must be included for the Customer Record. Additional addresses may be included for the CAT Customer if available within the Industry Member's system. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>addrType</i>	Choice	Address Record	OR	Exactly One per Address Record	The type of the Address Record. Values: ADDRESS1 —The first	<u>May optionally be populated with values</u>

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p>Address Record of the Customer.</p> <p>ADDRESS2—The second Address Record of the Customer.</p> <p>ADDRESS3—The third Address Record of the Customer.</p> <p>ADDRESS4—The fourth Address Record of the Customer.</p> <p><u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u></p>	<p>including:</p> <p>“ADDRESS1”</p> <p>“ADDRESS2”</p> <p>“ADDRESS3”</p> <p>“ADDRESS4”</p>
<i>addrLine1</i>	Extended Text (40)	Address Record	<u>RO</u>	Exactly One per Address Record	<p>The first Address Line for the aAddress Record.</p> <p><u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u></p>	
<i>addrLine2</i>	Extended Text (40)	Address Record	O	Zero or One per Address Record	<p>Additional space for Address Line. Must not be provided if <i>addrLine1</i> is not provided.</p> <p><u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u></p>	
<i>addrLine3</i>	Extended Text (40)	Address Record	O	Zero or One per Address Record	<p>Additional space for Address Line. Must not be provided if <i>addrLine2</i> is not provided.</p> <p><u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u></p>	
<i>addrLine4</i>	Extended Text (40)	Address Record	O	Zero or One per Address Record	<p>Additional space for Address Line. Must not be provided if <i>addrLine2</i> and</p>	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					addrLine3 are not provided. Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.	
city	Extended Text (100)	Address Record	OR	Exactly One per Address Record	City of the address. Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.	
regionCode	Extended Text (40)	Address Record	CO	Zero or One per Address Record	Code of the local region of the address. Required if the countryCode on the Customer Address Record is 'US' or 'CA' and must be provided in ISO 3166-2 format. For all other countryCodes, the regionCode must be provided in text format if known to the Industry Member. Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.	AA-XX* *Format when countryCode is 'US' or 'CA'
countryCode	Choice	Address Record	RO	Exactly One per Address Record	Code of the country of the address, in ISO 3166-1 alpha-2 format. Please view Appendix E for acceptable values. Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.	May optionally be formatted as: AA
postalCode	Text (15)	Address Record	CO	Zero or One per Address Record	Postal code of the address. Must be provided if postal codes exist for the country of the address. Please view Appendix E for acceptable formatting per country.	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
ein	Text (10)	Legal Entity Customer Record	<u>EO</u>	Zero or One per Legal Entity Customer Record	The Employer Identification Number (EIN) of the <u>CAT</u> Customer, in 99-9999999 format. May be included if the Input Identifier used to generate the Transformed Identifier of the <u>CAT</u> Customer was an EIN. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	99-9999999
customerType	Array [Choice]	Legal Entity Customer	R	Exactly One per Legal Entity Customer Record	Representation of the characteristics of the CAT Customer. All applicable values for the CAT Customer must be included in the array. All values included in the array must be separated by commas. Values: ACCREDITED – <u>CAT</u> Customer was identified as an accredited investor by the Industry Member as set forth in Rule 501(a) of the Securities Act of 1933, if maintained in the Industry Member’s general customer and account records. ADVISER – <u>CAT</u> Customer was identified as a U.S. registered Investment Adviser, if maintained in the Industry Member’s general customer and account records. BD – <u>CAT</u> Customer is a U.S. registered broker-dealer, if maintained in the Industry Member’s general customer and account records. Effective July 11, 2023, ‘BD’ must be populated for all U.S.	“ACCREDITED” “ADVISER” “BD” “FOREIGN” “NOTAPPLICABLE” “RIC” “TRUST”

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p>registered broker-dealer customer types, including for broker-dealer <u>CAT</u> Customers that were not identified as 'BD' prior to July 11, 2023.</p> <p>FOREIGN – <u>CAT</u> Customer is a Legal Entity that does not have a U.S. Tax Identifier.</p> <p>NOTAPPLICABLE – None of the defined terms are applicable to the <u>CAT</u> Customer.</p> <p>RIC – <u>CAT</u> Customer is a Registered Investment Company as defined in the Investment Company Act of 1940 (15 U.S.C. § 80a-3(a)(1)), if maintained in the Industry Member's general customer and account records.</p> <p>TRUST – <u>CAT</u> Customer is a trust.</p>	
<i>lei</i>	Alphanumeric (20)	Legal Entity Customer Record	C	Zero or One per Legal Entity Customer Record	The Legal Entity Identifier (LEI) of the <u>CAT</u> Customer. Must be provided if known to the Industry Member. Must be included if the Input Identifier used to generate the Transformed Identifier of the <u>CAT</u> Customer was an LEI.	
<i>updateNotification</i>	Boolean	Legal Entity Customer Record	OC	Zero or One per Legal Entity Customer Record	<p>May be optionally populated. Required as 'true' when the Customer Record is being reported to resolve a Material Inconsistency or is being reported with known updates to material attributes.</p> <p><u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u></p>	true false
<i>correctionList</i>	Multi-Dimensional Array	Main	C	Zero or One per Submission File	Structure for the array of Correction Action Records within the file. Required if the submission file contains one or more Correction Action Records.	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
<i>rejectionID</i>	Unsigned	Correction Action Record	R	Exactly One per Correction Record	The CAT-assigned <i>rejectionID</i> from a prior submission that was created for the particular data validation error being corrected.	
<i>correctionAction</i>	Choice	Correction Action Record	R	Exactly One per Correction Record	The action being taken to repair for the prior rejection. Values: CORRECTION – The prior rejection is being repaired by including a <i>correctingFirmDesignatedID</i> or a <i>correctingCustomerRecordID</i> . DELETE – The prior rejection is being cleared without submitting a <i>correctingFirmDesignatedID</i> or a <i>correctingCustomerRecordID</i> .	“CORRECTION” “DELETE”
<i>correctingFirmDesignatedID</i>	Text (40)	Correction Action Record	C	Zero or One per Correction Record	The <i>firmDesignatedID</i> that is repairing a previously rejected <i>firmDesignatedID</i> . The <i>correctingFirmDesignatedID</i> value must reference a corresponding <i>firmDesignatedID</i> value that is either included in the current submission file or was accepted by the Reference DatabaseCAT CAIS in a prior submission. Required if the <i>correctionAction</i> is ‘CORRECTION’ and the prior error being corrected was against a <i>firmDesignatedID</i> .	
<i>correctingCustomerRecordID</i>	Unsigned	Correction Action Record	C	Zero or One per Correction Record	A reference to the <i>customerRecordID</i> value in the submission file that is repairing a previously rejected Customer Record. The <i>correctingCustomerRecordID</i> value must reference a <i>customerRecordID</i> that is included in the current submission file. Required if the <i>correctionAction</i> is ‘CORRECTION’ and the prior error being corrected was against a Customer Record.	

4.2. Transformed Identifiers File

The Transformed Identifiers File contains the list of *tidValues* and the pointer to the *customerRecordID* from the [ReferenceCAIS](#) Data File. A single Transformed Identifiers File is to be submitted in a pairing with a single [ReferenceCAIS](#) Data File.

Table 8: Transformed Identifiers File

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
<i>version</i>	Text (10)	Main	R	Exactly One per submission file	The <i>version</i> of the Transformed Identifiers File Schema under which the data is reported. In Phase 1A , the <i>version</i> utilized for Reference Database Customer and Account reporting is 2.0.0. Effective in Phase 1B, version must be set to '1.0.0' for Transformed Identifier Files or else the file will be rejected.	2.0.0
<i>tidRecordCount</i>	Unsigned	Main	R	Exactly One per submission file	The count of TID Record occurrences within the file. Used to validate that the count of TID Records intended to be submitted within the file matches the count of records present in the file.	
<i>tidRecordList</i>	Multi-Dimensional Array	Main	C	Zero or One per submission file	Structure for the array of TID Records that are included in the file. Required if the submission file contains one or more TID Records; not required if no TID Records are included in the file.	
<i>customerRecordID</i>	Unsigned	TID Record	R	Exactly One per TID Record	A unique reference to a single Customer Record in the ReferenceCAIS	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					Data File. The value in this field must also be a value present in the <i>customerRecordIDs</i> in the ReferenceCAIS Data File.	
<i>tidType</i>	Choice	TID Record	R	Exactly One per TID Record	The specific type of Input Identifier used to generate the <i>tidValue</i> . Values: EIN –The <i>tidValue</i> was generated using an Employer Identification Number (EIN). FOREIGN –An identifier other than an EIN, SSN, or ITIN was used to generate the <i>tidValue</i> . SSN/ITIN –The <i>tidValue</i> was generated using a Social Security Number (SSN) or Individual Taxpayer Identification Number (ITIN).	“EIN” “FOREIGN” “SSN/ITIN”
<i>foreignTIDType</i>	Choice	TID Record	C	Zero or One per TID Record	The specific type of foreign Input Identifier used to generate a ‘FOREIGN’ <i>tidType</i> . Required to be populated if the <i>tidType</i> is ‘FOREIGN’. The following hierarchy must be followed if more than one identifier type is available for a foreign CAT Customer: Values: 1. NATIONALID – National registration or tax identifier, if the Industry Member knows the identifier was issued by a national-level government body or agency, or when the Industry Member	“DRIVERLICENS E” “LEI” “NATIONALID” “OTHGOVT” “PASSPORT” “PERMANENT”

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					cannot distinguish if the issuer is a national-level government body or agency. 2. LEI – Legal Entity Identifier. 3. PASSPORT – Country of issuance and passport number. 4. PERMANENT – Permanent resident identifier. 5. DRIVERLICENSE – Driver’s license identifier. 6. OTHGOVT – Other government-issued identifier, if the Industry Member knows the identifier was issued by a non-national level government body or agency, such as a regional agency. Must not be used if one of the other allowable values apply.	
<i>foreignTIDCountryCd</i>	Choice	TID Record	C	Zero or One per TID Record	Code of the country that issued the Input Identifier used to generate the 'FOREIGN' <i>tidType</i> , in ISO 3166-1 alpha-2 format. Please view Appendix E for acceptable values. Required if the <i>tidType</i> is 'FOREIGN' and the <i>foreignTIDType</i> is not 'LEI'.	AA
<i>tidValue</i>	Hexadecimal (64)	TID Record	R	Exactly One per TID Record	The obfuscated Input Identifier of the CAT Customer whose data is being reported.	
<i>replacedByTIDType</i>	Choice	TID Record	C	Zero or One per TID Record	The specific type of Input Identifier used to generate the <i>replacedByTID</i> when a CAT Customer’s Input Identifier has changed. Required when <i>replacedByTID</i>	“EIN” “FOREIGN” “SSN/ITIN”

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p>is populated.</p> <p>Values:</p> <p>EIN –The <i>replacedByTID</i> was generated using an Employer Identification Number (EIN).</p> <p>FOREIGN –An identifier other than an EIN, SSN, or ITIN was used to generate the <i>replacedByTID</i>.</p> <p>SSN/ITIN –The <i>replacedByTID</i> was generated using a Social Security Number (SSN) or Individual Taxpayer Identification Number (ITIN).</p>	
<i>replacingForeignTIDType</i>	Choice	TID Record	C	Zero or One per TID Record	<p>The specific type of foreign Input Identifier used to generate a 'FOREIGN' <i>replacedByTIDType</i> when a foreign CAT Customer's Input Identifier has changed. Required to be populated if the <i>replacedByTIDType</i> is 'FOREIGN'. The following hierarchy must be followed if more than one identifier type is available for a foreign CAT Customer:</p> <p>Values:</p> <p>1. NATIONALID – National registration or tax identifier, if the Industry Member knows the identifier was issued by a national-level government body or agency, or when the Industry Member cannot distinguish if the issuer is a national-level government body or agency.</p>	<p>"DRIVERLICENS E"</p> <p>"LEI"</p> <p>"NATIONALID"</p> <p>"OTHGOVT"</p> <p>"PASSPORT"</p> <p>"PERMANENT"</p>

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p>2. LEI – Legal Entity Identifier.</p> <p>3. PASSPORT – Country of issuance and passport number.</p> <p>4. PERMANENT – Permanent resident identifier.</p> <p>5. DRIVERLICENSE – Driver’s license identifier.</p> <p>6. OTHGOVT – Other government-issued identifier, if the Industry Member knows the identifier was issued by a non-national level government body or agency such as a regional agency. Must not be used if one of the other allowable values apply.</p>	
<i>replacingForeignTIDCountryCd</i>	Choice	TID Record	C	Zero or One per TID Record	<p>Code of the country that issued the Input Identifier used to generate the ‘FOREIGN’ <i>replacedByTIDType</i> when a foreign CAT Customer’s Input Identifier has changed; in ISO 3166-1 alpha-2 format. Please view Appendix E for acceptable values. Required if the <i>replacedByTIDType</i> is ‘FOREIGN’ and the <i>replacingForeignTIDType</i> is not ‘LEI’.</p>	AA
<i>replacedByTID</i>	Hexadecimal (64)	TID Record	C	Zero or One per TID Record	<p>The obfuscated Input Identifier of the CAT Customer when the CAT Customer’s Input Identifier has changed. Must be provided if the <i>roleEndReason</i> is ‘REPLACED’. Must not be provided when <i>roleEndReason</i> is a value other than</p>	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					'REPLACED'.	

5. Submission Process

This section contains information pertaining to [Reference Database CAT-CAIS](#) file submission and data formats, [Reference Database CAT-CAIS](#) submissions (including a general data flow overview), network and transport options, [CAT-Reference DatabaseCAIS](#) access, and reporting hours.

5.1. File Submissions and Data Formats

All submissions to [the Reference DatabaseCAIS](#) are required to be in UTF-8 encoding. The following are examples of input UTF-8 values and their corresponding expected SHA-256 hashes:

Input Value	Hashed Value
999-99-9999	1438887c12c566c8f87325380e06517bfb2e46e4de7e07fc6f004ea5bb21945d
111-11-1111	4628ea314743d5ac373997763be3d39b86fc40c5d2015d2db345b0231e215b6c
000-00-0000	5fb0d784eb4b5277d787d9fef634cde3f1915fe4ae306d4a4c41db866565e7bd

A single submission to [the Reference DatabaseCAT-CAIS](#) must be comprised of a paired [ReferenceCAIS](#) Data File and Transformed Identifiers File, even if record counts are zero for both files. The base filenames for the [ReferenceCAIS](#) Data File and Transformed Identifiers File must use identical name values, comprised of the CAT Submitter ID, CAT Reporter CRD, File Generation Date, optional Group, and File Number, to be identified as a pair. [Reference DatabaseCAIS](#) files have a prescribed naming convention and are supported in JSON format. It is acceptable to submit a file set containing zero records, for example if an Industry Member has no updates to report but chooses to continuously generate and submit a daily file.

Submissions must include a [ReferenceCAIS](#) Data File with populated header record information, including *version*, *catReporterCRD*, *catSubmitterID*, *fdidRecordCount*, and Customer Record Count (populated in the *naturalPersonCustomerRecordCount* and *legalEntityCustomerRecordCount* fields). It is valid and acceptable for an Industry Member to submit a file with only this header information and record counts of zero, indicating an intentional submission of no [Account-FDID](#) or Customer [rRecord](#) data.

Transformed Identifiers File submissions must include populated header record information, including *version* and *tidRecordCount*. It is valid and acceptable for an Industry Member to submit a file with only this header information and a record count of zero, indicating an intentional submission of no TID data.

5.1.1. File Submission Names

1. [ReferenceCAIS](#) Data Files must be named using the following format:

<CAT Submitter ID>_<CAT Reporter CRD>_<File Generation Date>_[<Group>_]<File Kind>_<File Number>.<Format Extension>.<Compression Extension>

For example: 123_999_20200101_CAIS_000123.json.bz2

2. Transformed Identifier Files must be named using the following format:

<CAT Submitter ID>_<CAT Reporter CRD>_<File Generation Date>_[<Group>_]<File Kind>_<File Number>.<Format Extension>.<Compression Extension>

For example: 123_999_20200101_TIDS_000123.json.bz2

3. The values assigned within the format of a filename include:

Table 9: Elements of a File Submission Name

Field Name	Data Type	Description	Include Key
CAT Submitter ID	Unsigned	The ID of the firm submitting the file to CAT.	R
CAT Reporter CRD	Unsigned	The CRD number assigned to the Industry Member to which the data within the file belongs.	R
File Generation Date	Date	The date the file was generated or reported. Used to guarantee uniqueness of a file across dates. Date must be less than or equal to System Date. Future dates are not acceptable.	R
Group	Alphanumeric (20)	Industry Member-defined string optionally included to guarantee uniqueness of a file across dates. Filenames associated with manually created submissions entered into the Reference DatabaseCAT Reporter Portal –CAIS will be assigned the Group value of 'caisweb'. Submission files uploaded via the Reference DatabaseCAT Reporter Portal –CAIS or submitted via SFTP must not use a value of 'caisweb' for the Group field or else the file will be rejected with Error Code 21010. Using a value of 'CAIS', uppercase or lowercase, is not recommended because the feedback filename will not be in the format described in Section 6 .	O
File Kind	Alphanumeric (30)	Set to 'CAIS' for CAIS Reference Data Files . In Phase 1B, File Kind must be set to 'REF' for Reference Data Files or else the file will be rejected. For now, File Kind must continue to be set to 'CAIS' for Reference Data Files. Set to 'TIDS' for Transformed Identifiers Files.	R
File Number	Unsigned	Sequence number of the file, 6-digits long, left-padded with zeros.	R
Format Extension	Alphanumeric (4)	Represents the format of the data submission. JSON formatted submissions must be 'json'.	R

Field Name	Data Type	Description	Include Key
Compression Extension	Alphanumeric (3)	Applicable to ReferenceCAIS Data and Transformed Identifiers Files. Set to 'bz2'.	R

4. Filenames are required to be globally unique among all other files using the base name (the portion of the filename without the format and compression extensions) of the file.
5. A single [Reference DatabaseCAT CAIS](#) submission must consist of a paired [ReferenceCAIS](#) Data File and Transformed Identifiers File, noted by the same filename for the [ReferenceCAIS](#) Data File and Transformed Identifiers File for the combination of CAT Submitter ID, CAT Reporter CRD, File Generation Date, optional Group (if present on either), and File Number attributes.
6. If either of the paired [ReferenceCAIS](#) Data or Transformed Identifiers Files must be resubmitted, both files must be renamed to avoid a duplicate file warning.

5.1.2. Submission Formats

The [Reference DatabaseCAT CAIS](#) supports the submission of data in JSON format only, due to the relational nature of the Account and Customer [reference](#) data.

5.1.3. [CAISReference](#) Data File Submission

The following [additional](#) rules apply to [ReferenceCAIS](#) Data Files:

1. The Plan Processor will support standard JSON syntax for each record or as specified in this document.
2. [ReferenceCAIS](#) Data Files serve as top-level containers for each object.
3. All [ReferenceCAIS](#) Data Files sent from the Industry Member (or the third-party CAT Reporting Agent for the Industry Member) must be compressed using BZip2. The associated compression extension is "bz2".
4. [ReferenceCAIS](#) Data Files must be individually compressed and submitted. Compressed files may not be bundled into a single container file.
5. The data contained within the [ReferenceCAIS](#) Data File must represent data for the CAT Reporter CRD number identified within the filename.
6. A [ReferenceCAIS](#) Data File without an associated Transformed Identifiers File posted within 60 minutes of the [ReferenceCAIS](#) Data File submission will result in an error.
7. A Transformed Identifiers File without an associated [ReferenceCAIS](#) Data File posted within 60 minutes of the Transformed Identifiers File submission will result in an error.
8. The CAT Submitter ID, CAT Reporter CRD, File Generation Date, optional Group, and File Number must be the same for the [ReferenceCAIS](#) Data File and paired Transformed Identifiers File.

9. The ReferenceCAIS Data File submission must be the same schema *version* as the Transformed Identifiers File.
10. Files submitted through SFTP are limited to a maximum uncompressed size of 7GB.
11. Files sizes <= 1GB are recommended as feedback will be returned faster.
12. ReferenceCAIS Data Files submitted through the Reference DatabaseCAT Reporter Portal –CAIS are limited to a maximum uncompressed size of 1GB, ~~with a record limit of 100,000 FDID Records per file and 100,000 Customer Records. Files with more than 100,000 FDID Records and/or more than 100,000 Customer Records will be rejected.~~
13. Schema files will be maintained by the Plan Processor and will be versioned as the Technical Specifications change.
14. Updates or changes will only be enacted on records as contained within the submission file. Records previously received and not included in a later submission file will not be changed in the Reference Database CAT CAIS until included in a subsequent submission file.
15. Records included in a submission file must reflect the complete and current state of that record. This includes all pertinent associations and fields. The new record state will replace the state of the record in the Reference DatabaseCAIS if it had been previously accepted-submitted. Any associations that were previously accepted into the Reference DatabaseCAIS but are omitted in the subsequent submission of the record, will be implicitly ended; likewise, any fields that were previously accepted but are omitted will be implicitly cleared.
16. ReferenceCAIS Data Files may contain original submissions, updates to records contained in prior submissions, Industry Member-initiated corrections of records contained in prior submissions, and record error repairs.
- ~~16-17.~~ Industry Members are only required to include records in their submission for new Active Accounts or when changes occur to previously accepted Active Accounts, however each record present in the file must contain the current state of fields and associations of the record.
- ~~17-18.~~ Conditional and optional fields reported without a value will be assumed to be NULL. Conditional and optional fields may also be present in a submission with a 'null' value in order to be interpreted as NULL.

5.1.3.1. CAISReference Data File Submission – FDID

The following additional rules apply to FDID Records present within ReferenceCAIS Data Files:

1. An active FDID being submitted to the Reference DatabaseCAIS must have at least one associated CAT Customer within the submission file. The maximum number of CAT Customers that can be associated to the FDID is 2,000.
2. Each FDID Record included in a submission file must contain all fields and associations that reflect its current state.

3. If any [CAT](#) Customer associated to an FDID within a submission file is rejected due to data validation errors, the FDID and all of its other [CAT](#) Customer associations will be rejected as well.
4. If an Industry Member needs to clear a previously submitted conditional or optional field value, it must omit the field in a resubmission, which will implicitly clear the value, or include it in a resubmission with an explicit value of 'null'. The full state of the FDID Record must be included as well. For example, if an Industry Member previously ended an FDID Record for a reason other than 'REPLACED', and the Industry Member wants to resume submission of the FDID Record, it can simply omit the *fdidEndDate* and *fdidEndReason* from the resubmission.
5. Each FDID Record in a submission file must include any and all applicable *accountType* values that are applicable for the FDID. The *accountType* value of 'ENTITYID' can only be used if the *fdidType* for the FDID is 'ENTITYID', and the *accountType* value of 'RELATIONSHIP' can only be used if the *fdidType* for the FDID is 'RELATIONSHIP' – as such, the *accountType* values 'RELATIONSHIP' and 'ENTITYID' cannot be used when *fdidType* is 'ACCOUNT'.
6. If the *fdidType* for an FDID Record is 'RELATIONSHIP' or 'ENTITYID', the *role* of the associated [CAT](#) Customer(s) must be 'TRDHOLDER'.
7. If an Industry Member ends an FDID Record by populating the *fdidEndDate* and *fdidEndReason* fields, but does not include some or all of the currently active LTIDs associations stored in [the Reference DatabaseCAIS](#), the omitted active LTIDs associated to the ended FDID will be systematically ended. The *fdidEndDate* and *fdidEndReason* will be cascaded as the *ltidEndDate* and *ltidEndReason*, respectively.
8. If an Industry Member ends an FDID Record and an LTID or [CAT](#) Customer association to that FDID exists with an *ltidEffectiveDate* and/or *roleStartDate* later than the submitted *fdidEndDate*, the *ltidEffectiveDate* and/or *roleStartDate* will be systematically updated to match the *fdidEndDate* in order to prevent rejection.
9. If an Industry Member is ending an FDID Record that has currently active LTIDs associated to the ending FDID, and it does not want the date and reasons cascaded, it must explicitly end the LTID-to-FDID association by including the association in the submission file and populating the *ltidEndDate* and *ltidEndReason* fields.
10. Clearing previously set *fdidEndDate* and *fdidEndReason* fields will not result in implicit reactivation of LTID nor [CAT](#) Customer associations of the FDID. [CAT Customer and LTID associations \(if applicable\) must be explicitly reestablished.](#)
11. If an LTID is associated to multiple FDID Records within a single Industry Member, the LTID-to-FDID association must be submitted for each FDID. The associations may be submitted within a single submission file or across multiple submission files as associations are established.
12. If an LTID becomes associated to an FDID that was previously submitted to and accepted by [the Reference DatabaseCAT-CAIS](#), the Industry Member must establish the LTID-to-FDID association by

including the FDID in a submission file with all appropriate fields and associations and include the new LTID within the *largeTraderList* array of the FDID Record.

13. If an Industry Member is ending an FDID Record that has one or more stored LTID associations where the *ltidEndDate* is set to a date later than the *fdidEndDate* and the association is omitted from the submission, the *ltidEndDate* values stored in [the Reference DatabaseCAIS](#) will be systematically updated to the earlier *fdidEndDate* value. The *ltidEndReason* currently set on the association will not be updated if it differs from the submitted *fdidEndReason* value.
14. If an LTID-to-FDID association that was previously stored in [the Reference DatabaseCAIS](#) is omitted from a subsequent submission of the FDID Record, the association will be implicitly ended. The date the subsequent submission was acknowledged by [the Reference DatabaseCAIS](#) will be used as the *ltidEndDate* and the *ltidEndReason* will be set to 'ENDED'. The *ltidEffectiveDate* will be unchanged in this case.
- ~~15. The *replacedByFDID* value included in a submission file must reference an FDID that is either included in the current submission file or was accepted by CAT CAIS in a prior submission file.~~
- ~~16. If the *replacedByFDID* record in a submission file was not accepted by CAT CAIS in a prior submission file and is not included in the current submission file or is included in the current submission file but the replacing FDID Record does not pass data validation checks, the submission record referencing the replacing FDID will fail data validation and will not be accepted by CAT CAIS.~~
- ~~17. The *correctingFirmDesignatedID* value included in a submission file must reference a corresponding *firmDesignatedID* value that is either included in the current submission file or was accepted by CAT CAIS in a prior submission file.~~
- 18-15. If the *firmDesignatedID* value listed in the *correctingFirmDesignatedID* field in a submission file was not accepted by [the Reference Database CAT CAIS](#) in a prior submission file and is not included in the current submission file or is included in the current submission file but the FDID Record does not pass data validation checks, the repairing submission record referencing the FDID Record will fail data validation and will not be accepted by [the Reference DatabaseCAT CAIS](#).
- 19-16. If a [CAT](#) Customer is associated to multiple FDID Records within a single Industry Member, the Customer-to-FDID association must be submitted for each FDID. The associations may be submitted within a single submission file or across multiple submission files as associations are established.
- 20-17. If a [CAT](#) Customer becomes associated to an FDID that was previously submitted to and accepted by [the Reference DatabaseCAT CAIS](#), the Industry Member must establish the Customer-to-FDID association by including the FDID in a submission file with all fields that apply and including the [CAT](#) Customer's *role* within the *fdidCustomerList* array of the FDID Record. The current state of the corresponding Customer Record must be included in the submission as well.
- 21-18. If an Industry Member ends an FDID Record by populating the *fdidEndDate* and *fdidEndReason* fields, but does not include some or all of the currently active Customer-to-FDID associations stored in [the Reference DatabaseCAIS](#), the omitted active [CAT](#) Customers associated to the ended FDID

will be systematically ended. The *fdidEndDate* and *fdidEndReason* will be cascaded as the *roleEndDate* and *roleEndReason*, respectively.

~~22. If an FDID has previously been submitted to CAIS without an *fdidEndDate* or *fdidEndReason* set, and the FDID is no longer “Active” as defined by the CAT NMS Plan (i.e., has not had any CAT-reportable transaction activity for the previous six months), an Industry Member can designate the FDID as ‘INACTIVE’ in CAIS. An *fdidEndReason* of ‘INACTIVE’ indicates the FDID is not in scope for the periodic refresh requirements.~~

23.19. If an Industry Member is ending an FDID Record that has currently active CAT Customers associated to the ending FDID, and they do not want the date and reasons cascaded, they must explicitly end the Customer-to-FDID association by including the association in the submission file and populating the *roleEndDate* and *roleEndReason* fields.

24.20. If an FDID Record has one or more stored Customer-to-FDID associations where the *roleEndDate* is set and the Industry Member subsequently ends the FDID Record with an *fdidEndDate* populated with a date prior to the previously set *roleEndDate*, and the CAT Customer association is omitted from the resubmission, the *roleEndDate* values stored in the Reference DatabaseCAIS will be systematically updated to the earlier *fdidEndDate* value. The *roleEndReason* currently set on the association will not be updated if it differs from the submitted *fdidEndReason* value.

25.21. If a Customer-to-FDID association that was previously stored in the Reference DatabaseCAIS is omitted from an FDID submission, the association will be implicitly ended. The date the submission was acknowledged by the Reference DatabaseCAIS will be used as the *roleEndDate* and the *roleEndReason* will be set to ‘ENDED’. The *roleStartDate* will be unchanged in this case. There are some scenarios where it is not permissible to implicitly end a Customer-to-FDID association. See Section 3.2 – Replacement of Transformed Identifier (TID) for more information.

~~26. Each FDID Record within a submission file must contain at least one Address Record and may contain up to four total Address Records. When multiple Address Records are included in the file, they must use the address type values corresponding to the counts of addresses in the file. For example, if two Address Records are included, they must be ‘ADDRESS1’ and ‘ADDRESS2’.~~

~~27. The FDID Record submission must contain all current Address Records for the FDID Record. If a previously stored Address Record is not included in a subsequent submission of the FDID Record, the Address Record(s) that is not received is stored as a historical address of the FDID.~~

~~28. CAIS allows for four address lines of up to 40 characters per line, or 160 total characters for each FDID address. Address lines exceeding 40 characters may be continued to the next address line. Industry Members must report each FDID address as it appears in its books and records and are not expected to use specific abbreviations or standardization (e.g., “ST” or “ST.” for “Street”), or white space trimming when submitting the address information to CAIS.~~

- ~~29. When the *accountType* of the FDID Record is 'DVP/RVP', each FDID Record within a submission file must contain a populated value for the *DVPCustodianID* field.~~
- ~~30. If an FDID Record has an *accountType* of 'DVP/RVP' and there is no *DVPCustodianID* assigned to the FDID Record because the custodian is a non-DTC custodian (e.g., a foreign custodian), then the value of 'FOR' must be used in the *DVPCustodianID* field. If an Industry Member optionally reports a DVP/RVP account that is temporarily not assigned a clearing number or DTC number because the account is new, or the current clearing number or DTC number has been removed from DTCC's ALERT service and no new clearing number or DTC number is available, the Industry Member must populate the *DVPCustodianID* field with 'DTCRM'. Further, the *DVPCustodianID* must be immediately updated upon receipt of the new clearing number or DTC number.~~
- ~~31. Industry Members reporting data for their correspondents, such as a clearing firm reporting Accounts of an introducing broker, are not required to populate the *branchOfficeCRD* field for the FDIDs being reported for correspondents. While the *registeredRepCRD* is an optionally reported field, it is likewise not expected for Industry Members reporting data for their correspondents to populate this field.~~
- ~~32-22.~~ When optionally populated, the FDID submission must include any and all *registeredRepCRD* values for current Registered Representatives of the FDID. If a specific CRD that was previously stored for an FDID is not included in a subsequent submission of the FDID, the CRD that is no longer received will no longer be stored in association with the FDID. For Industry Members optionally reporting the *registeredRepCRD*, it is not anticipated that *registeredRepCRD* is populated for institutional accounts, as defined by FINRA Rule 4512(a)(1)(c).
- ~~33-23.~~ Each CAT Customer of an FDID must only ever have one active *role* in association to the FDID at a time. If a CAT Customer changes its *role* – for example, a Holder of the Account that does not have authorization to trade on the Account is granted authorization to trade – the original *role* must be ended either by resubmitting the FDID Record with the CAT Customer's *roleEndDate* and *roleEndReason* or by resubmitting the FDID Record with the CAT Customer's new *role* and *roleStartDate* and omitting the CAT Customer's previous *role* and previous *roleStartDate*. Ending the association and adding the new association may occur within a single submission, however there cannot be overlap of more than one calendar day between the effective date ranges for each association for a given CAT Customer.
- ~~34-24.~~ Each active FDID must have at least one active association to a CAT Customer with trading capabilities. Each FDID must have at least one active association to a CAT Customer with a *role* of 'TRDHOLDER', or at least one active association to a CAT Customer with a *role* of 'AUTH3RD' or 'AUTHREP' where *hasDiscretion* is 'true'.
- ~~35-25.~~ No validation will occur for LTID Dates (*ltidEffectiveDate* and *ltidEndDate*) compared to the associated FDID Dates (*fdidDate* and *fdidEndDate*). However, the *ltidEffectiveDate* included in a submission must still be set to a value earlier than the *ltidEndDate* when *ltidEndDate* is populated.

~~36. If an Address Record for an FDID is a United States military or diplomatic address, the *countryCode* field is to be populated with 'US' and the *regionCode* is to be populated with 'US-AA', 'US-AE', or 'US-AP', as applicable. The *city* field is to be populated with 'APO', 'DPO', or 'FPO', as applicable.~~

~~37-26.~~ If an Industry Member has closed an account and ended the associated FDID in [the Reference DatabaseCAIS](#), and later reopens the same account and resubmits the FDID to [the Reference DatabaseCAIS](#), ~~then~~ the *fdidDate* in the reopening submission must be updated to reflect the reopening date.

~~38-27.~~ If an Industry Member is ending an FDID in [the Reference DatabaseCAIS](#) with an *fdidEndReason* of 'CORRECTION', the *fdidEndDate* must be the same as the *fdidDate* to indicate that the FDID Record should never have been submitted to [the Reference DatabaseCAIS](#).

5.1.3.2. **CAISReference Data File Submission – CAT Customer**

The following [additional](#) rules apply to Customer Records present within [ReferenceCAIS](#) Data Files:

1. Each Customer Record present in the [ReferenceCAIS](#) Data File must have a corresponding entry in the Transformed Identifiers File. If a corresponding Transformed Identifiers File entry is not present, the Customer Record will be rejected.
2. A [CAT](#) Customer being submitted to [the Reference DatabaseCAIS](#) must have at least one associated FDID within the submission file or else the Customer Record will be rejected.
3. Each [CAT](#) Customer included in a submission file must contain all fields and associations that reflect its current state.
4. If any FDID associated to a [CAT](#) Customer within a submission file is rejected due to data validation errors, the [CAT](#) Customer will be rejected as well.
5. If an Industry Member needs to clear a previously submitted conditional or optional field value, it must omit the field in a resubmission, which will implicitly clear the value, or include it in a resubmission with an explicit value of 'null'. The full state of the Customer Record must be included as well.
6. If the [CAT](#) Customer listed in the *correctingCustomerRecordID* is not included in the current submission file or is included in the current submission file but the Customer Record does not pass data validation checks, the repairing submission record referencing the Customer Record will fail data validation and not be accepted by [the Reference DatabaseCAT-CAIS](#).
7. If a [CAT](#) Customer becomes associated to an FDID that was previously submitted to and accepted by [the Reference DatabaseCAT-CAIS](#), the Industry Member must establish the Customer-to-FDID association by including the FDID in a submission file with all relevant fields that apply and including the [CAT](#) Customer's *role* within the *fdidCustomerList* array of the FDID Record. The current state of the corresponding FDID Record must be included in the submission as well.
- ~~8. Each Customer Record within a submission file may contain up to four Address Records. Effective July 12, 2023, each Customer must be reported to CAIS with at least one address (up to four~~

addresses). When multiple Address Records are included in the file, they must use the address type values corresponding to the counts of addresses in the file. For example, if two Address Records are included, they must be 'ADDRESS1' and 'ADDRESS2'.

9. The Customer submission must contain all current Address Records for the Customer Record. If a previously stored Address Record is not included in a subsequent submission of the Customer, the Address Record(s) that is not received is stored as a historical address of the Customer.
10. CAIS allows for four address lines of up to 40 characters per line, or 160 total characters for each Customer address. Address lines exceeding 40 characters may be continued to the next address line. Industry Members must report each Customer address as it appears in its books and records and are not expected to use specific abbreviations or standardization (e.g., "ST" or "ST." for "Street"), or white space trimming when submitting the address information to CAIS.
11. If a single Customer is associated to multiple FDIDs and included in a single submission file, the Industry Member must ensure the following attributes are consistent across all versions—Customer Record type for a 'FOREIGN' *tidType* record (i.e., reporting only as a Natural Person or a Legal Entity), *yearOfBirth*, and *ein*. Failure to maintain consistent data on these fields will result in the rejection of all instances of the Customer Record.
12. If a single Customer is associated to multiple FDIDs and included in multiple submission files, the Industry Member must ensure the following attributes are consistent across all versions, even when the files are submitted by different CAT Submitters—Customer Record type for a 'FOREIGN' *tidType* record (i.e., reporting only as a Natural Person or a Legal Entity), *yearOfBirth*, and *ein* (see footnote 4). Failure to maintain consistent data on these fields will result in an intrafirm Material Inconsistency for the Customer.
13. Each Customer in a submission file must include any and all applicable *customerType* values that are applicable for the Customer. If none of the defined terms are applicable for the Customer, the value of 'NOTAPPLICABLE' is to be used.
14. If an Industry Member stores a single name value for its Customer who legally has one name (i.e., a first name but no last name, or a last name but no first name), it must populate the *lastName* field with the name recorded in its books and records and populate the *firstName* field with a value of 'NNVE' (No Name Value Exists). If the Industry Member stores the legal name as both the first name and the last name (perhaps, due to system requirements), the Industry Member may report the Customer as described above or may populate the stored values in the respective *firstName* field and *lastName* field.
15. If an Address Record for a Customer is a United States military or diplomatic address, the *countryCode* field is to be populated with 'US' and the *regionCode* is to be populated with 'US-AA', 'US-AE', or 'US-AP', as applicable. The *city* field is to be populated with 'APO', 'DPO', or 'FPO', as applicable.

~~16. If a Customer Record is rejected and the Industry Member subsequently determines that (1) it does not have an obligation to submit the Customer information to CAIS; and (2) it does not have the information required to repair the rejection, the rejection may be deleted by submitting a CAIS Data File referencing the rejectionID in the correctionList with a correctionAction of 'DELETE'.~~

~~17.8. When tidType is 'FOREIGN', foreignTIDCountryCd must not be 'US'. In addition, when tidType is 'FOREIGN', replacingForeignTIDCountryCd must not be 'US'.~~

5.1.4. Transformed Identifiers File Submission

The following additional rules apply to the Transformed Identifiers Files and the records present within the file:

1. Schema files will be maintained by the Plan Processor and will be versioned as the Technical Specifications change.
2. A single *tidValue* may be present within the Transformed Identifiers File in association with differing *customerRecordID* values.
3. Each TID Record present in the Transformed Identifiers File must reference a record present in the ReferenceCAIS Data File. If a corresponding record is not present in the ReferenceCAIS Data File – either in the *naturalPersonCustomerList* or the *legalEntityCustomerList*, the individual TID entry in the Transformed Identifiers File will be rejected and not processed for additional validations.
- ~~4. A TID Record must be created from an appropriately formatted Input Identifier for SSN/ITIN and EIN inputs, including the hyphen(s) – that is, SSN/ITIN values formatted as '999-99-9999' or EIN values formatted as '99-9999999'.~~
- ~~5. Format validation will not occur for foreign Input Identifiers.~~
- ~~6. A TID Record must be created from a valid Input Identifier, as noted
 - a. For 'SSN/ITIN'
 - i. No values having an Area Number (first three digits) of 000 nor 666.
 - ii. No values having a Group Number (middle two digits) of 00.
 - iii. No values having a Serial Number (last four digits) of 0000.
 - iv. No values of 111-11-1111, 333-33-3333, 666-66-6666, nor 123-45-6789.
 - b. For 'EIN'
 - i. No range validation will occur for TIDs generated from EINs.~~
- 7.4. Associating an 'SSN/ITIN' with a CAT Customer in the *legalEntityCustomerList* or an 'EIN' with a CAT Customer in the *naturalPersonCustomerList* will result in a rejection of the Customer Record.
- ~~8.5.~~ A *tidValue* generated from an invalid Input Identifier, or submitted with an incorrect *tidType* value, will cause the Customer Record to be rejected.

9.6. Transformed Identifiers Files submitted through the Reference DatabaseCAT Reporter Portal—CAIS are limited to a maximum uncompressed size of 1GB, ~~with a record limit of 100,000 TID Records per file. Files with more than 100,000 TID Records will be rejected.~~

5.1.5. Paired ReferenceCAIS Data File and Transformed Identifiers File JSON Example

The following JSON example demonstrates how a clearing firm (*catReporterCRD* 123456) must structure a ReferenceCAIS Data File submission for an account that it holds for a correspondent (*correspondentCRD* 3210) when it is using a CAT Reporting Agent (*catSubmitterID* 99999) to submit to the Reference DatabaseCAT CAIS.

```
{
  "version": "2.0.0",
  "catReporterCRD": 123456,
  "catSubmitterID": 99999,
  "correspondentCRD": 3210,
  "fdidRecordCount": 3,
  "naturalPersonCustomerRecordCount": 3,
  "legalEntityCustomerRecordCount": 1,
  "fdidRecordList": [
    {
      "fdidRecordID": 1,
      "firmDesignatedID": "EZAccount123",
      "fdidType": "ACCOUNT",
      "accountType": ["OPTION"],
      "accountName": "JointMgdAcct",
      "fdidDate": 20190102,
      "addressList": [
        {
          "addrType": "ADDRESS1",
          "addrLine1": "123 MAIN ST",
          "city": "NEW YORK",
          "regionCode": "US NY",
          "countryCode": "US",
          "postalCode": "10011"
        },
        {
          "addrType": "ADDRESS2",
          "addrLine1": "1 WATERS ST",
          "addrLine2": "TRADING DESK 15",
          "city": "JERSEY CITY",
          "regionCode": "US NJ",
          "countryCode": "US",
          "postalCode": "07097"
        }
      ],
      "largeTraderList": [
        {
          "largeTraderRecordID": 1,
          "largeTraderID": "12345678-0001",
          "ltidEffectiveDate": 20190501
        }
      ],

```

```

    {
      "largeTraderRecordID": 2,
      "largeTraderID": "98765432-1234",
      "ltidEffectiveDate": 20190501
    }
  ],
  "fdidCustomerList": [
    {
      "customerRecordID": 1,
      "role": "TRDHOLDER",
      "roleStartDate": 20190102
    },
    {
      "customerRecordID": 4,
      "role": "TRDHOLDER",
      "roleStartDate": 20190102
    },
    {
      "customerRecordID": 15,
      "role": "AUTHREP",
      "hasDiscretion": true,
      "roleStartDate": 20190501
    }
  ]
},
{
  "fdidRecordID": 2,
  "firmDesignatedID": "MyTestEntity",
  "fdidType": "ENTITYID",
  "accountType": ["ENTITYID"],
  "accountName": "AllAcctTest",
  "fdidEndDate": 20191201,
  "fdidDate": 20170308,
  "fdidEndReason": "ENDED",
  "addressList": [
    {
      "addrType": "ADDRESS1",
      "addrLine1": "1604 RIVERSIDE DRIVE",
      "city": "HILL VALLEY",
      "regionCode": "US CA",
      "countryCode": "US",
      "postalCode": "91361"
    }
  ]
},
{
  "fdidRecordID": 3,
  "firmDesignatedID": "InternalRel",
  "fdidType": "RELATIONSHIP",
  "accountType": ["RELATIONSHIP"],
  "accountName": "Relationship Acct",
  "fdidDate": 20150121,
  "addressList": [
    {
      "addrType": "ADDRESS1",
      "addrLine1": "84 BEACON ST",


```

```


"city": "BOSTON",
"regionCode": "US-MA",
"countryCode": "US",
"postalCode": "02101"
},
{
"addrType": "ADDRESS2",
"addrLine1": "400 PRIVATE DRIVE",
"city": "LITTLE WHINGING",
"regionCode": "SURREY",
"countryCode": "GB",
"postalCode": "A9A 9A9"
},
{
"addrType": "ADDRESS3",
"addrLine1": "84 BEACON ST",
"city": "BOSTON",
"regionCode": "US-MA",
"countryCode": "US",
"postalCode": "02101"
}
],
"largeTraderList": [
{
"largeTraderRecordID": 1,
"largeTraderID": "98765432-1234",
"ltidEffectiveDate": 20180501
},
{
"largeTraderRecordID": 2,
"largeTraderID": "11223344-0001",
"ltidEffectiveDate": 20180901
},
{
"largeTraderRecordID": 3,
"largeTraderID": "99887766-6543",
"ltidEffectiveDate": 20200105
}
],
"fdidCustomerList": [
{
"customerRecordID": 2,
"role": "TRDHOLDER",
"roleStartDate": 20150121
}
],
],
"naturalPersonCustomerList": [
{
"customerRecordID": 1,
"firstName": "JOHN",
"lastName": "DOE",
"nameSuffix": "SENIOR",
"doingBusinessAs": "JOHN'S PLUMBING",
"yearOfBirth": 1980,


```

```


"addressList": [
  {
    "addrType": "ADDRESS1",
    "addrLine1": "123 MAIN ST",
    "city": "NEW YORK",
    "regionCode": "US-NY",
    "countryCode": "US",
    "postalCode": "10011"
  }
],
"customerType": ["ACCREDITED"]
},
{
"customerRecordID": 4,
"firstName": "JANE",
"lastName": "DOE",
"yearOfBirth": 1982,
"addressList": [
  {
    "addrType": "ADDRESS1",
    "addrLine1": "123 MAIN ST",
    "city": "NEW YORK",
    "regionCode": "US-NY",
    "countryCode": "US",
    "postalCode": "10011"
  }
],
"customerType": ["ACCREDITED"],
"updateNotification": true
},
{
"customerRecordID": 15,
"firstName": "ALEXANDER",
"middleName": "W",
"lastName": "SMYTHE",
"yearOfBirth": 1975,
"customerType": ["EMPLOYEE"]
"addressList": [
  {
    "addrType": "ADDRESS1",
    "addrLine1": "1 WATERS ST",
    "addrLine2": "TRADING DESK 15",
    "city": "JERSEY CITY",
    "regionCode": "US-NJ",
    "countryCode": "US",
    "postalCode": "07097"
  }
],
"legalEntityCustomerList": [
  {
"customerRecordID": 2,
"legalName": "PRIMARY TRADING",
"addressList": [
  {
    "addrType": "ADDRESS1",
    "addrLine1": "84 BEACON ST",


```

```

    "city": "BOSTON",
    "regionCode": "US-MA",
    "countryCode": "US",
    "postalCode": "02101"
  }
},
    "customerType": ["FOREIGN"]
  }
],
"correctionList": [
  {
    "rejectionID": 1127,
    "correctionAction": "CORRECTION",
    "correctingFirmDesignatedID": "EZAccount123"
  },
  {
    "rejectionID": 821,
    "correctionAction": "DELETE"
  }
]
}

```

The following JSON example demonstrates how the Industry Member would structure the companion Transformed Identifier File submission.

```

{
  "version": "2.0.0",
  "tidRecordCount": 4,
  "tidRecordList": [
    {
      "customerRecordID": 1,
      "tidType": "SSN/ITIN",
      "tidValue":
"01a544629efb952287e554eb23ef69c52097a75aecc0e3a93ca0855ab6d7a31a0"
    },
    {
      "customerRecordID": 2,
      "tidType": "FOREIGN",
      "foreignTIDType": "NATIONALID",
      "foreignTIDCountryCd": "GB",
      "tidValue":
"26f917bb38d0309e438e57e06a241473ed7a59bae503712dee9c5cff3ecb50e7"
    },
    {
      "customerRecordID": 4,
      "tidType": "SSN/ITIN",
      "tidValue":
"4628ea314743d5ac373997763be3d39b86fc40c5d2015d2db345b0231e215b6c"
    },
    {
      "customerRecordID": 15,
      "tidType": "SSN/ITIN",
      "tidValue":
"568ca6d8af479889d124c329061ea0762a9c87abc3c80fddb659804477531e1a"
    }
  ]
}

```

```
]
}
```

5.1.6. Schema

An Industry Member schema file that details the structure and expected contents of every [Reference DatabaseCAIS](#) file submission is available on the CAT public website. The schema file will be maintained by the Plan Processor and will be versioned as the [Account and Customer submission](#) file formats change. The [Reference DatabaseCAT CAIS](#) schema file will use the JSON schema format as defined at <https://json-schema.org/>.

5.1.6.1. Schema Version

Schema changes will be updated when changes to the CAT Reporting Technical Specifications for Industry Members occur that impact the schema. The following rules apply:

1. The Schema Version is formatted as <Major>.<Minor>.<Patch>. All digits must be represented.
 - **Major** – updated when a change occurs that impacts all or a significant portion of Industry Members. In such cases, the schema is not backward compatible and will be specified accordingly.
 - **Minor** – updated when a change occurs that does not require coding changes for all Industry Members. In such cases, the schema is not backward compatible.
 - **Patch** – updated when a change occurs that does not require coding changes for any Industry Members.
2. Records contained in a [ReferenceCAIS](#) Data File must be formatted as per the schema version noted in the submission file.
3. Feedback provided by [CAT CAIS the Reference Database](#) will set the *version* equal to the applicable schema version for the submission file.

5.1.6.2. Schema Definition

The schema file is a JSON format file that represents the following:

1. **Data Types** – CAT-defined data types containing the following elements:
 - **dataType**: Data Type (e.g., Text) as defined in [Table 2: Data Types](#).
 - **JSONDataType**: JSON standard data type to be used to submit data of this type.
 - **maxLength**: Maximum length of the string submission. Applicable to text and alphanumeric types only.
2. **Choices** – For choice data types, the list of possible values.
3. **Name/Value Pairs** – Field specifications for Name/Value Pair fields.

- **name:** Field Name.
- **dataType:** Data Type or an array of Data Types.
- **JSONDataType:** The JSON standard data type or an array of JSON standard data types.
- **required:** Indicates whether the field is "Required," "Conditional," or "Optional."

5.2. Connectivity

Connectivity to CAT will be through at least one of the following methods:

- Private Line provided by a Managed Network Service Provider (MNSP)
- AWS PrivateLink⁵
- CAT Secure Reporting Gateway (SRG) Reporter Portal

Both the Private Line and AWS PrivateLink connectivity methods will support the CAT File Transfer service, which provides access for automated, machine-to-machine file submissions, acknowledgements, rejections, and corrections using the Secure File Transfer Protocol (SFTP) service as well as to the CAT Reporter Portal for interactive reporting through web-based forms or manual file uploads.

The CAT Secure Reporting Gateway (SRG) connectivity method will only support the CAT Reporter Portal. The SRG requires multi-factor authentication (MFA) to establish a secure, encrypted session before accessing the CAT Reporter Portal. The SRG requires the use of modern browsers supporting HTML5 and TLS (Transport Layer Security). No client software installation is required.

The combinations of Connectivity and Interface Methods are summarized below.

Table 10: Connectivity Methods and Supported CAT Interfaces Methods

Connectivity Methods	Interface Methods	
	CAT File Transfer	<u>Reference Database</u> CAT Reporter Portal -CAIS
Private Line provided by MNSP	Y	Y
AWS PrivateLink	Y	Y
CAT Secure Reporting Gateway (SRG)	N	Y

⁵ Industry Members and CAT Reporting Agents interested in AWS PrivateLink should contact the FINRA Helpdesk at 888-696-3348 or at help@finracat.com.

For a detailed description of the CAT Connectivity Methods, including instructions for establishing access and connectivity to the CAT system, refer to the [FINRA CAT Connectivity Supplement for Industry Members](#).

5.3. CAT Interface Methods

The interface methods available to Industry Members and CAT Reporting Agents to submit data and retrieve reporting feedback include CAT File Transfer and the [Reference Database CAT Reporter Portal—CAIS](#). For a detailed description of the CAT Interface Methods, including instructions for establishing access and connectivity to the CAT system, refer to the [FINRA CAT Connectivity Supplement for Industry Members](#) and the [CAT CAIS Reporter Portal User Guide](#) [Reference Database Reporter Portal User Guide](#).

The following identifies the types of CAT information with the respective interface methods available for each:

Table 11: CAT Data and Feedback Interface Methods

CAT Data Submission and Feedback	Category	Reference Database CAIS SFTP	Reference Database CAT Reporter Portal — CAIS	CAT Reporter Portal
Submission of Reference Database CAT CAIS files	Submission	✓	✓	
Resubmission of Rejected Files/Records, Corrections and Updates Notifications	Submission	✓	✓	
Interactive CAT Reportable FDID Record Account Entry	Submission		✓	
Interactive CAT Reportable Customer Record Entry	Submission		✓	
File Status Retrieval	Feedback	✓	✓	
Reporting Statistics	Feedback		✓	
Error Feedback	Feedback	✓	✓	
Data Inconsistencies Feedback	Feedback	✓	✓	
FDID Reconciliation Report	Feedback		✓	
FDID Refresh Report	Feedback	✓	✓	
Account Maintenance	Administration			✓
Establishment of Reporting Relationships	Administration			✓

5.3.1. CAT File Transfer

The CAT File Transfer method is an automated, machine-to-machine interface utilizing the Secure File Transfer Protocol (“SFTP”) for file submissions, acknowledgements, rejections and corrections. SFTP enables Industry Members and CAT Reporting Agents to create machine-to-machine connections to securely transmit data and retrieve data from FINRA CAT. In order to ensure Customer and Account reference data is never commingled with the TID value, the two file types must be posted to separate SFTP sites.

There are two separate host sites that are utilized for ~~Reference DatabaseCAIS data~~ reporting to ensure the separation of the Customer and Account reference data submissions from the Transformed Identifiers File. This additional physical separation for file posting further increases the security of the data within the Transformed Identifiers File, and the separate directory structure reduces risks of files being cross-posted to the incorrect directory.

The following is the SFTP directory structure that will be made available in the submitter’s home directory for posting ReferenceCAIS Data Files and received feedback and reports. Files associated with ReferenceCAIS Data File submissions, associated feedback, and reports will be uploaded in SFTP directories as per the following table.

Table 12: SFTP Directories – ReferenceCAIS Data, Feedback, and Reports

SFTP Directory	Usage
/submitterID/cat/cais/upload	SFTP submissions of <u>ReferenceCAIS</u> Data Files uploaded by CAT Submitters. CAT will move files from this directory for further processing. <u>In Phase 1B, the SFTP Directory will be:</u> <u>/submitterID/cat/ref/upload</u>
/submitterID/cat/cais/feedback	<u>ReferenceCAIS</u> Data Feedback Files, Outstanding Rejections Feedback Files and Sentinel Files and Outstanding Material Inconsistencies Feedback Files and Sentinel Files. <u>In Phase 1B, the SFTP Directory will be:</u> <u>/submitterID/cat/ref/feedback</u>
/submitterID/cat/cais/reports	Directory for the FDID Refresh Report.

The following is the SFTP directory structure that will be made available on the separate host site for posting the Transformed Identifiers File and received feedback files.

Table 13: SFTP Directory – Transformed Identifiers File

Identifiers Data SFTP Directory	Usage
/submitterID/cat/tid/upload	SFTP submissions of Transformed Identifiers Files uploaded by CAT Submitters. CAT will move files from this directory for further processing.
/submitterID/cat/tid/feedback	Transformed Identifiers Feedback File.

The following additional rules apply:

1. Processing is initiated when a file appears in the /submitterID/cat/cais/upload directory paired with a corresponding file in the /submitterID/cat/tid/upload directory only.
2. Files posted to /submitterID/cat/cais/upload without a corresponding file submission posted to /submitterID/cat/tid/upload will be rejected ~~one hour~~ 60 minutes after posting.
3. Files posted to /submitterID/cat/tid/upload without a corresponding file submission posted to /submitterID/cat/cais/upload will be rejected ~~one hour~~ 60 minutes after posting.
4. CAT will remove files from the upload directory as soon as each file upload is complete.
5. The CAT Submitter must not delete files from the /submitterID/cat/cais/upload directory.
6. ~~Due to the CAT NMS Plan Defined PII considerations of the Account and Customer data, a~~ copy of uploaded files will not be made available to the Industry Member or CAT Submitter after submission.
7. Industry Members using SFTP will be able to obtain feedback files for files submitted through the SFTP, as well as any files submitted through the Reference Database~~CAT~~ Reporter Portal ~~–CAIS~~ through either file upload or manual submission.

5.3.2. Reference Database~~CAT~~ Reporter Portal ~~–CAIS~~

The Reference Database~~CAT~~ Reporter Portal ~~–CAIS~~ is a web interface utilizing secure encryption protocols (HTTPS/TLS) and multifactor authentication (MFA). The Reference Database~~CAT~~ Reporter Portal ~~–CAIS~~ will facilitate data submissions using the following methods:

- Manual data file uploads for files up to 1GB in size ~~and limited to 100,000 FDID and 100,000 Customer Records~~ meeting all requirements of Reference~~CAIS~~ Data Files as specified in Section 5.1.3.
- Manual data entry for original submissions, repairs for CAT-identified errors, and Industry Member-initiated corrections. These entries will be converted to submission files generated by the portal. ~~Because t~~hese files ~~will contain CAT NMS Plan Defined PII data, they~~ will not be available to download after submission.

- The Reference Database~~CAT~~ Reporter Portal ~~–CAIS~~ will include a summary view screen for records created through manual data entry that contains the record data which will be submitted, allowing users to confirm, and capture for their records, the details of their submission.
- For data security, Industry Members using the Reference Database~~CAT~~ Reporter Portal ~~–CAIS~~ will not be able to view the full details of the originally submitted record for repair of CAT-identified errors. The Reference Database~~CAT~~ Reporter Portal ~~–CAIS~~ will ~~only~~ display only the following fields regarding for the error record, and will require entry of all other data fields to be included in the repairing submission:
 - ♦ *catReporterCRD*
 - ♦ *catSubmitterID*
 - ♦ *firmDesignatedID*
 - ♦ *fdidRecordID*
 - ♦ *customerRecordID* (if error is against a Customer Record or an FDID-to-Customer association)
 - ♦ *largeTraderRecordID* (if error is against a Large Trader record)
 - ♦ *rejectionID*
 - ♦ *errorCode*
- Industry Members using the Reference Database~~CAT~~ Reporter Portal ~~–CAIS~~ will only be able to view Feedback Files for files submitted through the Reference Database~~CAT~~ Reporter Portal ~~–CAIS~~. They will not be able to view Feedback Files for files posted via SFTP.

5.4. Reference Database~~CAT CAIS~~ Reporting Hours

5.4.1. Submission to the Reference Database of CAT Account and Customer Data

The CAT NMS Plan requires Industry Members to report Received Industry Member Data, which includes Customer and Account reference data, by 8:00 a.m. Eastern Time on the CAT Trading Day following the day the Industry Member receives such Received Industry Member Data. Customer and Account reference data may be bulk uploaded at the end of the CAT Trading Day or may be submitted in batches with associated uploads throughout the day. All creation of, or modifications to, CAT reportable Customers and FDIDAccounts records are required to be submitted to the Reference Database~~CAT CAIS~~ by 8:00 a.m. Eastern Time on the CAT Trading Day following the day such information was received by the Industry Member.

Weekends or any day that all equities or options national securities exchanges are closed are not considered a CAT Trading Day.

The Reference DatabaseCAIS reporting requirements include the obligation to repair, correct and update records within the Plan-established deadlines. If an Industry Member discovers that it failed to make a required repair, correction or update, it must take appropriate action to ensure that the Customer and Account reference data was accepted into the Reference DatabaseCAIS system. This may include reporting information that no longer represents the current state of the record. For example, if an FDID Customer was originally reported to the Reference DatabaseCAIS without large trader information and later a large trader became associated to the FDID-an address in Maryland and the Customer notified the Industry Member that its address was changed to Virginia, but the Industry Member failed to report the large trader -Virginia address- to the Reference DatabaseCAIS. Then, the large trader was no longer associated to the FDID. Customer notified the Industry Member that its address was changed to Washington, DC. The Industry Member is required to submit an update to the FDID Record with the large trader information including the ItidEffectiveDate, ItidEndDate and ItidEndReason, "ENDED", Customer's record with the Virginia address first, ensuring it is accepted without rejections. Then the Industry Member must submit another update to the Customer's record with the Washington, DC address, ensuring that it is accepted without rejections. Reporting the records in sequential order will allow regulators to view the entirety of the account and customer history.

5.4.2. Deadline for Repair of Errors Identified by the Reference DatabaseCAT CAIS

For data submitted by 8:00 a.m. ET, errors will be identified by the Reference DatabaseCAT CAIS and provided to Industry Members by no later than 5:00 p.m. ET on the CAT Trading Day such information was submitted to CAT. Once available, repairs can be made immediately. All repairs must be submitted by 5:00 p.m. Eastern Time on the third Trading Day after the CAT Customer or Account FDID information became available to the Industry Member. Repairs received after the repair deadline will be accepted but considered late.

If an Industry Member determines that previously accepted Customer or Account reference data is incorrect, the Industry Member must correct the Customer or Account reference data even if it did not produce an error during processing. Industry Member-initiated corrections will be handled in the same method as any other update to the existing Customer or Account FDID record.

Table 14: Error Repair Deadline Examples

IM Receives Data	Holiday	Initial Report Due (T+1)	Repair Due (T+3)
Monday 2:20 p.m. ET	N/A	Tuesday 8:00 AM ET	Thursday 5:00 p.m. ET
Monday 11:40 p.m. ET	N/A	Wednesday 8:00 a.m. ET	Friday 5:00 p.m. ET
Friday 11:00 a.m. ET	N/A	Monday 8:00 a.m. ET	Wednesday 5:00 p.m. ET
Friday 4:02 p.m. ET	N/A	Monday 8:00 a.m. ET	Wednesday 5:00 p.m. ET

IM Receives Data	Holiday	Initial Report Due (T+1)	Repair Due (T+3)
Friday 4:02 p.m. ET	Next Monday	Tuesday 8:00 a.m. ET	Thursday 5:00 p.m. ET
Wednesday 3:00 p.m. ET	Thursday, Friday is half day	Friday 8:00 a.m. ET	Tuesday 5:00 p.m. ET
Saturday 11:15 a.m. ET	N/A	Tuesday 8:00 a.m. ET	Thursday 5:00 p.m. ET
Saturday 11:15 a.m. ET	Next Monday	Wednesday 8:00 a.m. ET	Friday 5:00 p.m. ET
Monday 10:00 a.m. ET (holiday)	On event date	Wednesday 8:00 a.m. ET	Friday 5:00 p.m. ET

5.4.3.—Deadline for Resolving Inconsistencies Identified by CAT CAIS

~~For data submitted by 8:00 a.m. ET, data inconsistencies feedback will be available by no later than 5:00 p.m. ET. Once available, data updates or confirmations can be made immediately. All updates or confirmations must be submitted by 5:00 p.m. Eastern Time on the third CAT Trading Day of the submission causing the Material Inconsistency. Updates or confirmations received after the resolution deadline will be accepted but considered late.~~

Table 16: Inconsistencies

Event Occurs/IM Receives Data	Holiday	Initial Report Due (T+1)	Inconsistency Resolution Due (T+3)
Monday 2:20 p.m. ET	N/A	Tuesday 8:00 a.m. ET	Thursday 5:00 p.m. ET
Monday 11:40 p.m. ET	N/A	Wednesday 8:00 a.m. ET	Friday 5:00 p.m. ET
Friday 11:00 a.m. ET	N/A	Monday 8:00 a.m. ET	Wednesday 5:00 p.m. ET
Friday 4:02 p.m. ET	N/A	Monday 8:00 a.m. ET	Wednesday 5:00 p.m. ET
Friday 4:02 p.m. ET	Next Monday	Tuesday 8:00 a.m. ET	Thursday 5:00 p.m. ET
Wednesday 3:00 p.m. ET	Thursday, Friday is half day	Friday 8:00 a.m. ET	Tuesday 5:00 p.m. ET
Saturday 11:15 a.m. ET	N/A	Tuesday 8:00 a.m. ET	Thursday 5:00 p.m. ET
Saturday 11:15 a.m. ET	Next Monday	Wednesday 8:00 a.m. ET	Friday 5:00 p.m. ET
Monday 10:00 a.m. ET (holiday)	On event date	Wednesday 8:00 a.m. ET	Friday 5:00 p.m. ET

5.5. Security

5.5.1. Encryption (In-transit)

TLS-based encryption, version 1.2 minimum, is required for connection to the [Reference Database Reporter Portal](#)~~—CAIS~~ (whether accessed via private line or the SRG) and to the Secure Reporting Gateway itself.

For SFTP, in addition to the fact that the SFTP service is only accessible via private line, traffic will be encrypted by virtue of the intrinsic encryption capabilities of SFTP. AES256 will be supported for SFTP; support for other encryption protocols is under evaluation.

5.5.2. Encryption (At-rest)

The [Reference Database](#)~~CAT CAIS system~~ will use native AWS encryption features to encrypt data upon receipt. No action is required by the Industry Member.

5.5.3. Authentication

Two-factor authentication will be required for access to the [Reference Database](#)~~CAT~~ Reporter Portal~~—CAIS~~. The first factor will be username and password which will require periodic rotation.

The second factor will be via push notification to an off-the-shelf application installed on a mobile device provided by the user. The user will be required to install the application to their mobile device through their mobile operating system's application store and then complete a registration process on the CAT Reporter Portal or SRG. There is no cost to the CAT Reporter or the user for this mobile application.

The SFTP service similarly requires that two conditions be met to access the interface. The first factor is authentication via username and password. The second is the use of a defined IP source address that is established during initial onboarding. The SFTP system implements an IP whitelist that prevents access from any system not on the whitelist.

More detailed information related to security is described in the [FINRA CAT Connectivity Supplement for Industry Members](#) available at <https://www.catnmsplan.com/registration/>.

6. Feedback and Corrections

CAT provides feedback associated with [Reference Database](#)~~CAT~~~~CAIS~~ submissions for Industry Members and CAT Submitters as follows:

- **File Status:** available via SFTP and the [Reference Database](#)~~CAT~~ Reporter Portal—~~CAIS~~, indicates the acceptance or associated errors with a submission file.
- **Reporting Statistics:** available via the [Reference Database](#)~~CAT~~ Reporter Portal—~~CAIS~~, daily summary statistics representing reporting activity and errors for prior submissions. Error rate is also included.
- **Error Feedback:** available via SFTP and the [Reference Database](#)~~CAT~~ Reporter Portal—~~CAIS~~, errors found during processing will be made available, including error code, affected FDID, and associated record ID(s) from the submission file.
- **Corrections Feedback:** available via the [Reference Database](#)~~CAT~~ Reporter Portal—~~CAIS~~, information is provided for the status of all repairs. When an error has been repaired, the updated status will be reflected.
- **Outstanding Rejections Feedback:** available via SFTP and the [Reference Database](#)~~CAT~~ Reporter Portal—~~CAIS~~, errors found during processing on that day or on prior days that have not been repaired, and therefore remain outstanding, including error code and details about the submission file that last contained the associated record ID(s).
- **Outstanding Material Inconsistencies Feedback:** available via SFTP and the [CAT Reference Database](#) Reporter Portal—~~CAIS~~, Material Inconsistencies found during processing on that day or on prior days that have not been resolved, and therefore remain outstanding, including inconsistency code, details about the submission file that last contained the Customer Record, and associated record ID(s) from the submission file.

This section describes the procedures for obtaining feedback and making repairs associated with feedback of errors. Additionally, this section describes the requirement for making corrections for accepted data for which there was no feedback.

6.1. File and Error Feedback

A feedback file will be made available for each submission file that is acknowledged as uploaded. This file will contain information about current status, as well as previously completed stages of processing. Feedback related to the following stages of processing is expected to be made available within the following timelines:

Table 15: Feedback and Error Correction Availability

Seq	Processing Stage	Feedback	Anticipated Delivery	Delivery No Later Than
1	File Acknowledgement	File Acknowledgement Status	Within 10 minutes of File Submission	1 hour of File Submission
2	File Integrity	File Integrity Error Status or File Integrity Passed Status	Within 30 minutes of File Submission	2 hours of File Submission
3	Data Validation	Data Errors including syntax and semantic errors	Within 1 hour of File Integrity Feedback	4 hours of File Integrity Feedback
4	Outstanding Material Inconsistencies and Outstanding Rejections Feedback	Outstanding Material Inconsistencies Data Errors that have not been repaired	5:00 p.m. Eastern Time 5:00 p.m. Eastern Time	5:00 p.m. Eastern Time 5:00 p.m. Eastern Time

Feedback Ffiles are versioned as they proceed through each stage of processing. The following tables, [Table 17](#), [Table 18](#) [Table 16](#) and [Table 19](#) [Table 17](#), show for each stage of processing which feedback file version will be posted and the possible submission status for each version. Not all files will proceed to feedback file version 4. For example, [ReferenceCAIS](#) Data Files that fail to pair will have a submission status of COMPLETED_FILE_TIMEOUT and will not proceed to version 4.

Table 16: [ReferenceCAIS](#) Data Feedback File Versions

Seq	Processing Stage	Version	Possible Submission Status
1	File Acknowledgement	v1	FILE_ACKNOWLEDGED INCOMPLETE_PROCESSING_FAILURE CANCELLED_BY_SUPPORT
2	File Integrity	v2	FILE_INTEGRITY_PASSED COMPLETED_INTEGRITY_ERROR INCOMPLETE_PROCESSING_FAILURE CANCELLED_BY_SUPPORT
3	Data Validation	v3	RECORD_SCAN_COMPLETED INCOMPLETE_PROCESSING_FAILURE CANCELLED_BY_SUPPORT COMPLETED_FILE_TIMEOUT
3	Data Validation	v4	COMPLETED_WITHOUT_REJECTIONS COMPLETED_WITH_REJECTIONS INCOMPLETE_PROCESSING_FAILURE CANCELLED_BY_SUPPORT

Table 17: Transformed Identifiers Feedback File Versions

Seq	Processing Stage	Version	Possible Submission Status
1	File Acknowledgement	v1	FILE_ACKNOWLEDGED INCOMPLETE_PROCESSING_FAILURE CANCELLED_BY_SUPPORT
2	File Integrity	v2	FILE_INTEGRITY_PASSED COMPLETED_INTEGRITY_ERROR INCOMPLETE_PROCESSING_FAILURE CANCELLED_BY_SUPPORT
3	Data Validation	v3	RECORD_SCAN_COMPLETED INCOMPLETE_PROCESSING_FAILURE CANCELLED_BY_SUPPORT
3	Data Validation	v4	COMPLETED COMPLETED_FILE_TIMEOUT INCOMPLETE_PROCESSING_FAILURE CANCELLED_BY_SUPPORT

6.1.1. Feedback Generation for ReferenceCAIS Data and Transformed Identifiers Files

Feedback associated with all processing stages will be made available via SFTP and/or the CAT Reference Database Reporter Portal —CAIS— as described in Table 11: CAT Data and Feedback Interface Methods. A series of feedback files will be generated for each file submission as the file progresses through File Acknowledgement, File Integrity and Data Validation. The filenames will have the same base portion, but with differing version values.

For feedback files made available via SFTP, the following additional rules apply:

1. The format of feedback files will be JSON.
2. Feedback Ffiles for ReferenceCAIS Data File submissions will be accessible under the `cat/cais/feedback` directory in the CAT Submitter’s home directory on the Feedback SFTP server.
3. Feedback Ffiles for Transformed Identifier File submissions will be accessible under the `cat/tid/feedback` directory in the CAT Submitter’s home directory on the Feedback SFTP server.
4. In addition to the feedback posted to the CAT Submitter’s home directories, the feedback for data submitted by a CAT Submitter on behalf of an Industry Member will be accessible under the Industry Member’s home directory on the Feedback SFTP server after the file has passed file integrity checks if the Industry Member has an SFTP account.
5. If a file is rejected for a file integrity error, it will not proceed to the next processing stage.

6. The minimum retention time for feedback files on the SFTP server is 10 calendar days. After that time, they may be removed from the server. Additionally, feedback files can be deleted from the SFTP directory by a submitter at any time. Feedback will be available via the [Reference DatabaseCAT Reporter Portal –CAIS](#) for 10 calendar days. Metadata regarding the submission will be available via the [Reference DatabaseCAT Reporter Portal –CAIS](#) for at least 90 days.

6.1.2. Feedback Filenames and Format

1. Feedback Files created by [the Reference DatabaseCAT CAIS](#) will be named using the following format:

```
<original file base name>.<version>.feedback.<Format Extension>.<Compression Type>
```

Example: SUBID_MYID_20200101_CAIS_000123.v1.feedback.json.bz2

Example: SUBID_MYID_20200101_TIDS_000123.v1.feedback.json.bz2

2. If a single Industry Member submits multiple files having the same original file base name, a file version will be appended to the original file base name – separate from the version attribute of the feedback filename – so that the feedback file for each version submitted can be retained.
3. Separate feedback files will be provided for the [ReferenceCAIS](#) Data and Transformed Identifiers Files.

Table 18: Elements of a [ReferenceCAIS](#) Data Feedback File

Field Name	Data Type	JSON Object	Includ e Key	Description
version	Text (10)	Main	R	The schema version of the feedback file used for providing the response.
submissionID	Unsigned	Main	R	The unique Submission ID assigned to the ReferenceCAIS Data File by the Reference DatabaseCAT CAIS system . Used to identify the single submission activity. If the same filename is submitted across multiple submissions, each submission instance will have a separate and unique Submission ID value.
submitterUsername	Text (200)	Main	R	The name associated to the CAT User ID of the account used to submit the file to the Reference DatabaseCAT CAIS .
catSubmitterID	Unsigned	Main	R	The ID of the firm that submitted the file to CAT.
catReporterCRD	Unsigned	Main	R	The CRD number assigned to the Industry Member to which the data within the submitted file belongs.
correspondentCRD	Unsigned	Main	C	The CRD number of the related introducing

Field Name	Data Type	JSON Object	Include Key	Description
				broker or correspondent firm whose customer and account data is kept on record at the Industry Member reporting to CAT. Only populated when <i>correspondentCRD</i> is populated in the submission file.
submissionStatus	Choice	Main	R	<p>The current status of the submission file in the processing flow.</p> <p>VALUES:</p> <ul style="list-style-type: none"> • FILE_ACKNOWLEDGED – indicates the file was acknowledged as having been submitted and has been picked up for file integrity checks. • FILE_INTEGRITY_PASSED – indicates the file passed file integrity checks and will now be processed through record data validations. • RECORD_SCAN_COMPLETED – indicates the file has completed record validations. If one or more records passed record validation, they will now be loaded to the Reference DatabaseCAIS. Details about any rejected records are now available within the feedback file in the <i>rejectionItems</i> section. • COMPLETED_WITHOUT_REJECTIONS – indicates the file has completed loading into the Reference DatabaseCAIS, and no data validation errors were encountered. No further updates will be made to the feedback file. • COMPLETED_WITH_REJECTIONS – indicates the file has completed data validation checks, and one or more data validation errors were encountered. No further updates will be made to the feedback file. • COMPLETED_INTEGRITY_ERROR – indicates the file failed file integrity checks and cannot be processed. No further updates will be made to the feedback file upon reaching this status. • COMPLETED_FILE_TIMEOUT – indicates the paired Transformed Identifiers File was not received within the prescribed time frame or was rejected. No further updates will be made to the feedback file. • INCOMPLETE_PROCESSING_FAILURE – indicates the file had an unexpected error and could not be processed. No further updates will be made to the feedback file. • CANCELLED_BY_SUPPORT –

Field Name	Data Type	JSON Object	Include Key	Description
				indicates the submission was cancelled by Reference DatabaseCAIS support staff at the request of the Industry Member. No further updates will be made to the feedback file.
receiptTimestamp	Timestamp (String)	Main	R	The time at which the file was acknowledged to have been submitted for processing.
completedTimestamp	Timestamp (String)	Main	C	The time at which the file completed processing, reaching a completed status. Only populated after the file has reached a final status of COMPLETED_INTEGRITY_ERROR , COMPLETED_FILE_TIMEOUT , COMPLETED_WITHOUT_REJECTIONS , COMPLETED_WITH_REJECTIONS , INCOMPLETE_PROCESSING_FAILURE or CANCELLED_BY_SUPPORT .
receivedFDIDRecordCount	Unsigned	Main	C	Total count of FDID Records present within the file. Only populated when the file has reached the interim status of RECORD_SCAN_COMPLETED or a final status of COMPLETED_WITHOUT_REJECTIONS or COMPLETED_WITH_REJECTIONS .
successfulFDIDRecordCount	Unsigned	Main	C	Total count of FDID Records processed without data validation errors. Only populated when the file has reached the interim status of RECORD_SCAN_COMPLETED or a final status of COMPLETED_WITHOUT_REJECTIONS or COMPLETED_WITH_REJECTIONS .
receivedNaturalRecordCount	Unsigned	Main	C	Total count of Natural Person Customer Records present within the file. Only populated when the file has reached the interim status of RECORD_SCAN_COMPLETED or a final status of COMPLETED_WITHOUT_REJECTIONS or COMPLETED_WITH_REJECTIONS .
successfulNaturalRecordCount	Unsigned	Main	C	Total count of Natural Person Customer Records processed without data validation errors. Only populated when the file has reached the interim status of RECORD_SCAN_COMPLETED or a final status of COMPLETED_WITHOUT_REJECTIONS or COMPLETED_WITH_REJECTIONS .
receivedLegalEntityRecordCount	Unsigned	Main	C	Total count of Legal Entity Customer Records present within the file. Only populated when the file has reached the interim status of RECORD_SCAN_COMPLETED or a final status of COMPLETED_WITHOUT_REJECTIONS or COMPLETED_WITH_REJECTIONS .
successfulLegalEntityRecordCount	Unsigned	Main	C	Total count of Legal Entity Customer Records processed without data validation errors. Only populated when the file has reached the interim status of RECORD_SCAN_COMPLETED or a final status of COMPLETED_WITHOUT_REJECTIONS or COMPLETED_WITH_REJECTIONS .

Field Name	Data Type	JSON Object	Include Key	Description
receivedCorrectionActionCount	Unsigned	Main	C	Total count of Correction Action records present within the file. Only populated when the file has reached the interim status of RECORD_SCAN_COMPLETED or a final status of COMPLETED_WITHOUT_REJECTIONS or COMPLETED_WITH_REJECTIONS .
successfulCorrectionActionCount	Unsigned	Main	C	Total count of Correction Action Records processed without data validation warnings. Only populated when the file has reached the interim status of RECORD_SCAN_COMPLETED or a final status of COMPLETED_WITHOUT_REJECTIONS or COMPLETED_WITH_REJECTIONS .
statusHistory	Name/Value Pair	Main	R	Includes the list of events and corresponding timestamps from file processing. Includes one or more of the following statuses: <ul style="list-style-type: none"> • FILE_ACKNOWLEDGED • FILE_INTEGRITY_PASSED • RECORD_SCAN_COMPLETED • COMPLETED_WITH_REJECTIONS • COMPLETED_WITHOUT_REJECTIONS • COMPLETED_FILE_TIMEOUT • INCOMPLETE_PROCESSING_FAILURE • COMPLETED_INTEGRITY_ERROR • CANCELLED_BY_SUPPORT
rejectionItems	Multi-Dimensional Array	Main	C	Includes the list of file integrity error codes or records having data validation errors. Only populated if the file had an integrity error or at least one record had a data validation error, and only when the file has reached the interim status of RECORD_SCAN_COMPLETED or the final statuses of COMPLETED_WITH_REJECTIONS or COMPLETED_INTEGRITY_ERROR .
rejectionID	Unsigned	Rejection Record	R	Identifier assigned by CAT to uniquely identify a rejected record or file.
firmDesignatedID	Text (40)	Rejection Record	C	The <i>firmDesignatedID</i> , as submitted to the Reference DatabaseCAIS , of the record having the data validation error. Only populated on FDID rejections.
fdidRecordID	Unsigned	Rejection Record	C	The <i>fdidRecordID</i> , as submitted to the Reference DatabaseCAIS , of the record having the data validation error. Only populated on FDID rejections.
largeTraderRecordID	Unsigned	Rejection Record	C	The <i>largeTraderRecordID</i> , as submitted to the Reference DatabaseCAIS , of the record having the data validation error. Only populated on Large Trader rejections.

Field Name	Data Type	JSON Object	Include Key	Description
customerRejectionEventID	Text (100)	Rejection Record	C	Only available in the Reference DatabaseCAT Reporter Portal—CAIS . A unique identifier assigned by CAT for the specific CAT Customer – by <i>tidValue</i> – having one or more rejections. If the same CAT Customer (<i>tidValue</i>) is subsequently rejected, it will be assigned the same unique identifier. This ID is used because the CAT-NMS Plan Defined PII—including <i>tidValue</i> – of the CAT Customer cannot be returned to the Industry Member after it is submitted to CAT.
customerRecordID	Array of Unsigned Values	Rejection Record	C	The <i>customerRecordID</i> , as submitted to the Reference DatabaseCAIS , of the record having the data validation error. Only populated on Customer Record rejections or when an FDID Record rejects because an associated Customer Record rejected.
addrType	Choice	Rejection Record	C	The <i>addrType</i> , as submitted to the Reference DatabaseCAIS , of the record having the data validation error. Only populated when an address error resulted in the rejection. When populated, either <i>firmDesignatedID</i> or <i>customerRecordID</i> will be populated. Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will not be delivered in feedback.
authTraderNameID	Unsigned	Rejection Record	C	The <i>authTraderNameID</i> , as submitted to the Reference DatabaseCAIS , of the record having the data validation error. Only populated when an Authorized Trader Name error resulted in the rejection. Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will not be delivered in feedback.
errorCode	Unsigned	Rejection Record	R	The error code of the file integrity error or data validation error.
rejectionTimestamp	Timestamp (String)	Rejection Record	R	Indicates the time at which the file integrity or data validation error was identified.
failedCorrectionItems	Multi-Dimensional Array	Main	C	Includes the list of Correction Action Records having data validation warnings. Only populated if at least one record had a data validation warning, and only when the file has reached the interim status of RECORD_SCAN_COMPLETED or a final status of COMPLETED_WITHOUT_REJECTIONS or COMPLETED_WITH_REJECTIONS .
failedRejectionID	Unsigned	Failed Correction Record	R	The unique ID reference reported in the submission file for the Correction Action Record that was not able to be processed.

Field Name	Data Type	JSON Object	Include Key	Description
warningCode	Unsigned	Failed Correction Record	R	The warning code of the data validation, noting which attribute caused the Correction Action Record to not be able to be processed.

Table 19: Elements of a Transformed Identifiers Feedback File

Field Name	Data Type	JSON Object	Include Key	Description
version	Text (10)	Main	R	The schema version of the feedback file used for providing the response.
submissionID	Text (36)	Main	R	The unique Submission ID assigned to the Transformed Identifier File by the Reference DatabaseCAIS system . Used to identify the single submission activity. If the same filename is submitted across multiple submissions, each submission instance will have a separate and unique Submission ID value.
submissionStatus	Choice	Main	R	<p>The current status of the submission file in the processing flow.</p> <p>VALUES:</p> <ul style="list-style-type: none"> • FILE_ACKNOWLEDGED – indicates the file was acknowledged as having been submitted, and has been picked up for file integrity checks. • FILE_INTEGRITY_PASSED – indicates the file passed file integrity checks and will now be processed through record data validations. • RECORD_SCAN_COMPLETED – indicates the file has completed record validations. If one or more records passed record validation, they will now be loaded to the Reference DatabaseCAIS. Details about any rejected records are now available within the feedback file in the <i>rejectionItems</i> section. • COMPLETED_INTEGRITY_ERROR – indicates the file failed file integrity checks and cannot be processed. No further updates will be made to the feedback file upon reaching this status. • COMPLETED – indicates the paired ReferenceCAIS Data and Transformed Identifiers Files have been successfully loaded into the Reference DatabaseCAIS. Please refer to the feedback file for details regarding outcomes of record validations. • COMPLETED_FILE_TIMEOUT –

Field Name	Data Type	JSON Object	Include Key	Description
				<p>indicates the paired ReferenceCAIS Data File was not received within the prescribed time frame or was rejected. No further updates will be made to the feedback file.</p> <ul style="list-style-type: none"> • INCOMPLETE_PROCESSING_FAILURE – indicates the file had an unexpected error and could not be processed. No further updates will be made to the feedback file. • CANCELLED_BY_SUPPORT – indicates the submission was cancelled by Reference DatabaseCAIS support staff at the request of the Industry Member. No further updates will be made to the feedback file.
receiptTimestamp	Timestamp (String)	Main	R	The time at which the file was acknowledged to have been submitted for processing.
completedTimestamp	Timestamp (String)	Main	C	<p>The time at which the file completed processing, reaching a completed status. Only populated after the file has reached a final status of:</p> <p>COMPLETED, COMPLETED_INTEGRITY_ERROR, COMPLETED_FILE_TIMEOUT, INCOMPLETE_PROCESSING_FAILURE or CANCELLED_BY_SUPPORT</p>
receivedTIDsCount	Unsigned	Main	C	Total count of TID Records present within the file. Only populated when the file has reached the final status of COMPLETED .
successfulTIDsCount	Unsigned	Main	C	Total count of TID Records processed without record validation warnings. Only populated when the file has reached the final status of COMPLETED .
statusHistory	Name/Value Pair	Main	R	<p>Includes the list of events and corresponding timestamps from file processing. Includes one or more of the following statuses:</p> <ul style="list-style-type: none"> • FILE_ACKNOWLEDGED • FILE_INTEGRITY_PASSED • RECORD_SCAN_COMPLETED • COMPLETED_INTEGRITY_ERROR • COMPLETED • COMPLETED_FILE_TIMEOUT • INCOMPLETE_PROCESSING_FAILURE • CANCELLED_BY_SUPPORT
rejectionItems	Multi-Dimensional Array	Main	C	Includes the list of file integrity error codes or records having data validation errors. Only populated if the file had an integrity error or at least one record had a data validation error, and only when the file has reached the interim status of RECORD_SCAN_COMPLETED or the final

Field Name	Data Type	JSON Object	Include Key	Description
				status of COMPLETED .
rejectionID	Unsigned	Rejection Record	C	Populated if a file integrity error occurs. If populated, set to 'null' in the Transformed Identifiers Feedback File.
customerRecordID	Array of Unsigned Values	Rejection Record	C	The <i>customerRecordID</i> , as submitted to the Reference DatabaseCAIS , of the record having the data validation error. Always populated unless the rejection resulted from file integrity error or a malformed or missing customerRecordID .
errorCode	Unsigned	Rejection Record	C	The error code of the file integrity error or data validation error.
rejectionTimestamp	Timestamp (String)	Rejection Record	R	Indicates the time at which the file integrity or data validation error was identified.

6.1.3. JSON Examples of Feedback File for File Acknowledgement

The following is an example of a [ReferenceCAIS](#) Data Feedback File after the submission has been acknowledged and accepted for file integrity checks:

Original ReferenceCAIS Data File Submission Filename	123_456_20200204_CAIS_000123.json.bz2
ReferenceCAIS Data Feedback Filename	123_456_20200204_CAIS_000123.v1.feedback.json.bz2
Feedback File Contents	<pre>{ "version": "2.0.0", "submissionID": 7, "submitterUsername": "eaisrefdbimusr", "catSubmitterID": 123, "catReporterCRD": 456, "submissionStatus": "FILE_ACKNOWLEDGED", "receiptTimestamp": "20200204T152233.000045000", "statusHistory": { "FILE_ACKNOWLEDGED": "20200204T152233.000045000" } }</pre>

The following is an example of a Transformed Identifiers Feedback File after the submission has been acknowledged and accepted for file integrity checks:

Original Transformed Identifiers File Submission Filename	123_456_20200204_TIDS_000123.json.bz2
Transformed Identifiers Feedback Filename	123_456_20200204_TIDS_000123.v1.feedback.json.bz2
Feedback File Contents	<pre>{ "version": "2.0.0", "submissionID": 15, "submissionStatus": "FILE_ACKNOWLEDGED", "receiptTimestamp": "20200204T152233.000045000", "statusHistory": { </pre>

	<pre>"FILE_ACKNOWLEDGED": "20200204T152233.000045000" } }</pre>
--	---

6.2. File Integrity

During the File Integrity processing stage, the submission file contents are also validated to ensure they are readable and formatted as expected.

The following additional rules apply:

1. Filenames which duplicate prior submissions accepted during File Integrity will reject, unless the original file had a file integrity error.
2. Files which are not readable will reject.
3. [ReferenceCAIS](#) Data Files which do not have a paired Transformed Identifiers File posted within 60 minutes will reject.
- 3.4. Transformed Identifiers Files which do not have a paired Reference Data File posted within 60 minutes will reject.
- 4.5. [ReferenceCAIS](#) Data Files which include inaccurate counts of records will reject.
- 5.6. Transformed Identifiers Files which include inaccurate counts of TIDs will reject.
- 6.7. The CAT Submitter ID within the filename must be equal to the Submitter ID of the submitter that sent the files (as determined from SFTP or [the Reference Database CAT-Reporter Portal –CAIS](#) username).
- 7.8. The CAT Reporter CRD within the filename must match the *catReporterCRD* populated in the [ReferenceCAIS](#) Data File.
- 8.9. The paired [ReferenceCAIS](#) Data and Transformed Identifiers Files must be submitted by the same Industry Member or CAT Reporting Agent.
- 9.10. If a CAT Submitter is reporting on behalf of the Industry Member, a reporting relationship must be effective.
- 10.11. [ReferenceCAIS](#) Data Files that have a file integrity error will result in the paired Transformed Identifiers File also having a file integrity error; likewise, Transformed Identifiers Files that have a file integrity error will result in the paired [ReferenceCAIS](#) Data File also having a file integrity error.

6.2.1. JSON Examples for File Integrity Feedback

File Submission Integrity Success:

Original ReferenceCAIS Data File Submission Filename	123_456_20200204_CAIS_000123.json.bz2
ReferenceCAIS Data Feedback Filename	123_456_20200204_CAIS_000123.v2.feedback.json.bz2

Feedback File Contents	{ <pre>"version": "2.0.0", "submissionID": 7, "submitterUsername": "refdbeaisimusr", "catSubmitterID": 123, "catReporterCRD": 456, "submissionStatus": "FILE_INTEGRITY_PASSED", "receiptTimestamp": "20200204T152233.000045000", "statusHistory": { "FILE_ACKNOWLEDGED": "20200204T152233.000045000", "FILE_INTEGRITY_PASSED": "20200204T152234.123245000" } }</pre>
------------------------	--

Original Transformed Identifiers File Submission Filename	123_456_20200204_TIDS_000123.json.bz2
Transformed Identifiers Feedback Filename	123_456_20200204_TIDS_000123.v2.feedback.json.bz2
Feedback File Contents	{ <pre>"version": "2.0.0", "submissionID": 15, "submissionStatus": "FILE_INTEGRITY_PASSED", "receiptTimestamp": "20200204T152233.000045000", "statusHistory": { "FILE_ACKNOWLEDGED": "20200204T152233.000045000", "FILE_INTEGRITY_PASSED": "20200204T152234.123245000" } }</pre>

File Submission Integrity Error:

Original ReferenceCAIS Data File Submission Filename	123_456_20200204_CAIS_000123.json.bz2
ReferenceCAIS Data Feedback Filename	123_456_20200204_CAIS_000123.v2.feedback.json.bz2
Feedback File Contents	{ <pre>"version": "2.0.0", "submissionID": 7, "submitterUsername": "refdbeaisimusr", "catSubmitterID": 123, "catReporterCRD": 456, "submissionStatus": "COMPLETED_INTEGRITY_ERROR", "receiptTimestamp": "20200204T152233.000045000", "completedTimestamp": "20200204T152721.023423000", "statusHistory": { "FILE_ACKNOWLEDGED": "20200204T152233.000045000", "COMPLETED_INTEGRITY_ERROR": "20200204T152721.023423000" }, "rejectionItems": [{ "rejectionID": 1127, "errorCode": 21007, "rejectionTimestamp": "20200204T152721.023423000" }] }</pre>

Original Transformed Identifiers File	123_456_20200204_TIDS_000123.json.bz2
---------------------------------------	---------------------------------------

Submission Filename	
Transformed Identifiers Feedback Filename	123_456_20200204_TIDS_000123.v2.feedback.json.bz2
Feedback File Contents	<pre>{ "version": "2.0.0", "submissionID": 15, "submissionStatus": "COMPLETED_INTEGRITY_ERROR", "receiptTimestamp": "20200204T152233.000045000", "completedTimestamp": "20200204T152721.023423000", "statusHistory": { "FILE_ACKNOWLEDGED": "20191123T152233.000045000", "COMPLETED_INTEGRITY_ERROR": "20200204T152721.023423000" }, "rejectionItems": [{ "rejectionID": null, "customerRecordID": null, "errorCode": 21507, "rejectionTimestamp": "20200204T152721.023423000" }] }</pre>

6.3. Data Validation

During Data Validation, records within the [ReferenceGAIS](#) Data File and Transformed Identifiers Files are validated. Validations to ensure correct syntax and semantics associated with record length, field length, data type, non-null and reference data checks are performed. Validations are initiated by the record type of every record contained in the file. Data Validation feedback will be provided with reference to any and all records that have data validation errors.

During the Data Validation stage, each record will be checked for proper formatting (JSON field names and values) and data contents.

The following [additional](#) rules apply:

1. Data Validation feedback will be generated for every submission file passing file integrity checks.
2. Any record within a [ReferenceGAIS](#) Data File determined to be malformed or otherwise invalid will be rejected, but will not cause a rejection of the full file. However, if an FDID Record rejects, all associated LTID and Customer records will also reject. If a Customer Record rejects, the FDID Record will reject and therefore, all other associated LTID and Customer records will also reject. In addition, if a Customer Record rejects for an error on the Customer Record, all other Customer Records within the submission file with the same *tidValue* will also reject.
3. Any record within a Transformed Identifiers File determined to be malformed or otherwise invalid will be rejected, but will not cause a rejection of the full file.
4. When a record is readable and can be parsed, data validations, data layer validations, and inconsistency checking will occur for every field within the record.

5. One or more errors may be found within a record.
6. Each error identified against a single FDID or Customer record will be listed separately within the feedback file.
7. The original record reported to [the Reference DatabaseCAT-CAIS](#) will not be included in the feedback file. The feedback file will instead include the associated record IDs (*fdidRecordID*, *largeTraderRecordID*, *customerRecordID*, *correctingCustomerRecordID*) of the record having the error. If the error is on an FDID Record, the *firmDesignatedID* will also be included in the feedback file.
8. Records that are not rejected during Data Validation will be imported into the [Reference DatabaseCAT-CAIS](#), even if one or more inconsistencies are identified in the accepted record.
9. If an FDID Record passes validation, but contains one or more errors on associated LTIDs, the FDID Record will be rejected and no updates from the record will be stored in [the Reference DatabaseCAIS](#).
10. If an FDID Record passes validation, but contains one or more errors on associated Customer Records, the FDID Record will be rejected and no updates from the record will be stored in [the Reference DatabaseCAIS](#).

6.3.1. JSON Examples for Data Validation Feedback

[ReferenceCAIS](#) Data File Submission Data Validation Success (Interim status noting that the record scan was completed):

Original ReferenceCAIS Data File Submission Filename	123_456_20200204_CAIS_000123.json.bz2
ReferenceCAIS Data Feedback Filename	123_456_20200204_CAIS_000123.v3.feedback.json.bz2
Feedback File Contents	<pre>{ "version": "2.0.0", "submissionID": 7, "submitterUsername": "refdbcaisimusr", "catSubmitterID": 123, "catReporterCRD": 456, "submissionStatus": "RECORD_SCAN_COMPLETED", "receiptTimestamp": "20200204T152233.000045000", "receivedFDIDRecordCount": 100, "successfulFDIDRecordCount": 100, "receivedNaturalRecordCount": 50, "successfulNaturalRecordCount": 50, "receivedLegalEntityRecordCount": 60, "successfulLegalEntityRecordCount": 60, "receivedCorrectionActionCount": 0, "successfulCorrectionActionCount": 0, "statusHistory": { "FILE_ACKNOWLEDGED": "20200204T152233.000045000", "FILE_INTEGRITY_PASSED": "20200204T152234.123245000", "RECORD_SCAN_COMPLETED": "20200204T152255.324392000", }, "rejectionItems": [], }</pre>

	"failedCorrectionItems":[] }
--	---------------------------------

Original Transformed Identifiers File Submission Filename	123_456_20200204_TIDS_000123.json.bz2
Transformed Identifiers Feedback Filename	123_456_20200204_TIDS_000123.v3.feedback.json.bz2
Feedback File Contents	{ "version": "2.0.0", "submissionID": 15, "submissionStatus": "RECORD_SCAN_COMPLETED", "receiptTimestamp": "20200204T152233.000045000", "receivedTIDsCount": "7", "successfulTIDsCount": "7", "statusHistory": { "FILE_ACKNOWLEDGED": "20200204T152233.000045000", "FILE_INTEGRITY_PASSED": "20200204T152234.123245000", "RECORD_SCAN_COMPLETED": "20200204T152255.324392000" } }

[ReferenceCAIS](#) Data File Submission Data Validation Success (Final status noting that the file completed Data Validation without rejections):

Original ReferenceCAIS Data File Submission Filename	123_456_20200204_CAIS_000123.json.bz2
ReferenceCAIS Data Feedback Filename	123_456_20200204_CAIS_000123.v4.feedback.json.bz2
Feedback File Contents	{ "version": "2.0.0", "submissionID": 7, "submitterUsername": "refdbcaisimusr", "catSubmitterID": 123, "catReporterCRD": 456, "submissionStatus": "COMPLETED_WITHOUT_REJECTIONS", "receiptTimestamp": "20200204T152233.000045000", "completedTimestamp": "20200204T152721.023423000", "receivedFDIDRecordCount": 100, "successfulFDIDRecordCount": 100, "receivedNaturalRecordCount": 50, "successfulNaturalRecordCount": 50, "receivedLegalEntityRecordCount": 60, "successfulLegalEntityRecordCount": 60, "receivedCorrectionActionCount": 0, "successfulCorrectionActionCount": 0, "statusHistory": { "FILE_ACKNOWLEDGED": "20200204T152233.000045000", "FILE_INTEGRITY_PASSED": "20200204T152234.123245000", "RECORD_SCAN_COMPLETED": "20200204T152255.324392000", "COMPLETED_WITHOUT_REJECTIONS": "20200204T152721.023423000" }, "rejectionItems": [], "failedCorrectionItems": [] }

Original Transformed Identifiers File	123_456_20200204_TIDS_000123.json.bz2
---------------------------------------	---------------------------------------

Submission Filename	
Transformed Identifiers Feedback Filename	123_456_20200204_TIDS_000123.v4.feedback.json.bz2
Feedback File Contents	<pre>{ "version": "2.0.0", "submissionID": 15, "submissionStatus": "COMPLETED", "receiptTimestamp": "20200204T152233.000045000", "completedTimestamp": "20200204T152721.023423000", "receivedTIDsCount": "7", "successfulTIDsCount": "7", "statusHistory": { "FILE_ACKNOWLEDGED": "20200204T152233.000045000", "FILE_INTEGRITY_PASSED": "20200204T152234.123245000", "COMPLETED": "20200204T152255.324392000" } }</pre>

ReferenceCAIS Data File Submission Data Validation Error and Failed Correction Action:

Original ReferenceCAIS Data File Submission Filename	123_456_20200204_CAIS_000123.json.bz2
ReferenceCAIS Data Feedback Filename	123_456_20200204_CAIS_000123.v4.feedback.json.bz2
Feedback File Contents	<pre>{ "version": "2.0.0", "submissionID": 7, "submitterUsername": "refdbcaisimusr", "catSubmitterID": 123, "catReporterCRD": 456, "submissionStatus": "COMPLETED_WITH_REJECTIONS", "receiptTimestamp": "20200204T152233.000045000", "completedTimestamp": "20200204T152721.023423000", "receivedFDIDRecordCount": 100, "successfulFDIDRecordCount": 99, "receivedNaturalRecordCount": 50, "successfulNaturalRecordCount": 49, "receivedLegalEntityRecordCount": 60, "successfulLegalEntityRecordCount": 60, "receivedCorrectionActionCount": 1, "successfulCorrectionActionCount": 0, "statusHistory": { "FILE_ACKNOWLEDGED": "2019200204T152233.000045000", "FILE_INTEGRITY_PASSED": "20200204T152234.123245000", "RECORD_SCAN_COMPLETED": "20200204T152255.324392000", "COMPLETED_WITH_REJECTIONS": "20200204T152721.023423000" }, "rejectionItems": [{ "rejectionID": 1127, "firmDesignatedID": "ABC123", "fdidRecordID": 4, "largeTraderRecordID": 2, "errorCode": 22012, "rejectionTimestamp": "20200204T152221.023423000" }, { "rejectionID": 9985, "customerRecordID": [73], }] }</pre>

	<pre> "errorCode": 22900, "rejectionTimestamp": "20200204T152221.023423000" }], "failedCorrectionItems": [{ "failedRejectionID": 5000, "warningCode": 24002 }] } </pre>
--	--

Original Transformed Identifiers File Submission Filename	123_456_20200204_TIDS_000123.json.bz2
Transformed Identifiers Feedback Filename	123_456_20200204_TIDS_000123.v4.feedback.json.bz2
Feedback File Contents	<pre> { "version": "2.0.0", "submissionID": 15, "submissionStatus": "COMPLETED", "receiptTimestamp": "20200204T152233.000045000", "completedTimestamp": "20200204T152721.023423000", "receivedTIDsCount": "7", "successfulTIDsCount": "6", "statusHistory": { "FILE_ACKNOWLEDGED": "20200204T152233.000045000", "FILE_INTEGRITY_PASSED": "20200204T152234.123245000", "COMPLETED": "20200204T152721.023423000" }, "rejectionItems": [{ "rejectionID": null, "customerRecordID": [73], "errorCode": 24902, "rejectionTimestamp": "20200204T152221.023423000" }] } </pre>

6.4. Inconsistencies

Once per day, Customer Records within the ~~Reference Database CAIS system~~ are scanned for inconsistent CAT Customer data. Inconsistencies that are identified during the scan for CAT Customers with an association to an active FDID are returned in feedback. ~~Industry Members that receive Material Inconsistency notifications must take action to resolve them, as described in Section 6.6.3.~~

On January 13, 2026, the SEC approved an amendment ("the Amendment") to the CAT NMS Plan relating to the Reference Database. The Amendment eliminates the requirements relating to the handling of inconsistencies. The Amendment changes will be implemented in two phases. In Phase 1A, Material Inconsistencies Feedback Files will be generated and posted. Per CAT Alert 2026-01, Industry Members are not required to resolve outstanding Material Inconsistencies. In Phase 1B, Material Inconsistency

feedback will be disabled and any submissions from Industry Members and CAT Reporting Agents that continue to include the *updateNotification* field will be rejected. See CAT Alert 2026-01 for more information.

6.4.1. Material Inconsistencies Identification

The process by which Material Inconsistencies are identified and reported back to Industry Members is known as the Material Inconsistencies Procedure. During the once-daily scan, Material Inconsistency checks will compare accepted Customer Records within and across Industry Members and generate Material Inconsistency notifications for foreign CAT Customers when ~~the CAT Customer's *tidValue* reported in the Transformed Identifiers File is the same but:~~

- ~~• A different *yearOfBirth* was reported (for CAT Customers submitted in the *naturalPersonCustomerList*); or~~
- ~~• A different *ein* was reported (for Customers submitted in the *legalEntityCustomerList*) (see footnote 4); or~~
- For foreign CAT Customers, the same combination of *foreignTIDType* (specifically, the 'OTHGOVT' or 'NATIONALID' values), *foreignTIDCountryCd*, and *tidValue* was submitted in the Transformed Identifiers File and the CAT Customer was reported in both the *naturalPersonCustomerList* and *legalEntityCustomerList* in different Reference Data #File submissions.

The following additional rules apply:

1. Customer Records receiving a Material Inconsistency have an active association to an active FDID Record where:
 - a. The Customer Record is associated to any FDID Record that has no set *fdidEndDate* or has an *fdidEndDate* set to a date greater than the current calendar date; and
 - b. The Customer Record has no *roleEndDate* or has a *roleEndDate* greater than the current calendar date.
2. Material Inconsistency checks within the same Industry Member ("intrafirm") will evaluate submissions from the same CAT Reporter CRD since the most recently accepted submission where *updateNotification* was accepted is populated with 'true'.
3. Material Inconsistency checks across Industry Members ("interfirm") will evaluate the most recently accepted submission of the CAT Customer regardless of how *updateNotification* is populated.
4. All Material Inconsistencies (intrafirm and interfirm) will be reported to all affected Industry Members on the date that the Material Inconsistency was identified. ~~Customer Records accepted by CAIS from an Industry Member that submitted the one-time attestation will not receive an interfirm Material Inconsistency. See Section 6.6.3 for more information on the one-time attestation.~~

- ~~5. All Customer Records submitted by 8:00 a.m. Eastern Time and accepted into CAIS will participate in the once-daily Material Inconsistencies scan, along with Customer Records that were previously accepted into CAIS. Feedback containing any Material Inconsistencies will be delivered in a metadata file and data file set by 5:00 p.m. Eastern Time. Customer Records submitted after the cut-off time and accepted into CAIS will participate in the following day's Material Inconsistencies scan.~~
- ~~6. The window for resolution begins with the CAT Trading Day of the identification of the Material Inconsistency.~~
- ~~7.5. If a Material Inconsistency exists and has not been resolved ("Outstanding Inconsistency"), additional Material Inconsistencies will not be created.~~
- ~~8.6. Customer Records that have a data validation error and are rejected will not be checked for inconsistencies.~~
- ~~9.7. If a Material Inconsistency is identified against a Customer Record due to conflicting data from another Industry Member (interfirm inconsistency) and is resolved by resubmitting the Customer Record with *updateNotification* populated with 'true', it will not result in a new Material Inconsistency against the same Customer Record unless the Industry Member submits the same CAT Customer with data that introduces a new intrafirm Material Inconsistency.~~

~~Intrafirm Material Inconsistency Example:~~

~~Within the Transformed Identifiers File, an Industry Member submits a specific combination of *tidValue* and *tidType* (and *foreignTIDType*, if applicable) for a Customer to CAIS and in the paired CAIS Data File, indicates the customer's *yearOfBirth* is '1980' and the Customer Record is accepted. Later, the same Industry Member submits the same combination of *tidValue*, and *tidType* (and *foreignTIDType*, if applicable) to CAIS and it is accepted, this time the *yearOfBirth* is '1908'. The Industry Member has a Material Inconsistency (an intrafirm inconsistency) and the second submission will get a Material Inconsistency notification with Inconsistency Code 30002 (Inconsistent data for *yearOfBirth* within the Industry Member).~~

~~Interfirm Material Inconsistency Example:~~

~~If Industry Member A submits a specific combination of *tidValue* and *tidType* (and *foreignTIDType*, if applicable) for a Customer to CAIS and indicates the customer's *yearOfBirth* is '1980' and the Customer Record is accepted, and subsequently Industry Member B submits the same combination of *tidValue* and *tidType* (and *foreignTIDType*, if applicable) to CAIS indicating that the Customer's *yearOfBirth* is '1970' and the Customer Record is accepted, a Material Inconsistency (interfirm inconsistency) for the Customer Record will be created. Industry Member A and Industry Member B will both get a Material Inconsistency notification with Inconsistency Code 40002 (Inconsistent data for *yearOfBirth* across Industry Members).~~

6.4.2. Outstanding Material Inconsistencies Feedback File

Material Inconsistencies found during the once-daily scan as well as Material Inconsistencies that remain unresolved at the time of the daily scan will be delivered in feedback consisting of a metadata file and data file set.

The following additional rules apply to Outstanding Material Inconsistencies Feedback Files:

1. Feedback files for Outstanding Material Inconsistencies will be accessible via the Reference Database~~CAT~~ Reporter Portal—~~CAIS~~ and under the `/submitterID/cat/cais/feedback` directory in the CAT Submitter's home directory on the Feedback SFTP server.
2. A sentinel file will be posted to the SFTP directory to indicate that the inconsistencies scan ran successfully and is complete. The sentinel file will be empty.
3. If there are no outstanding Material Inconsistencies, only a sentinel file will be posted to the SFTP folder to indicate the operation ran successfully but did not produce any results.
4. The Outstanding Material Inconsistencies Feedback File will include all intrafirm and interfirm Material Inconsistencies identified during the once-daily scan and any intrafirm and interfirm Material Inconsistencies that were previously identified and have not been resolved.
5. Outstanding Material Inconsistencies Feedback Files will be delivered to the CAT Submitter and the CAT Reporter.
6. Outstanding Inconsistencies Feedback will include a metadata and data file set. The data file will include details about the inconsistencies and the metadata file will include the count of inconsistencies contained within the data file.
7. A set(s) of metadata file and data file will be delivered for each combination of CAT Submitter, CAT Reporter CRD and Correspondent CRD.
8. The Outstanding Material Inconsistencies Data Feedback File will be limited to 400,000 *inconsistencyEventIDs*. If the *catReporterCRD* and *correspondentCRD* combination exceeds 400,000 *inconsistencyEventIDs*, an additional set(s) of metadata and data files will be delivered.
9. Each inconsistency identified against a single Customer Record will be listed in the feedback file against a single *inconsistencyEventID* assigned to the CAT Customer.

Outstanding Material Inconsistencies Metadata Feedback Files will be named using the following format:

```
<CAT Submitter ID>_<CAT Reporter CRD>_<Correspondent CRD>_<File Generation Date>_<File Kind>_<Group>_<File Type>.<Format Extension>
```

Example: 123_456_2_20240401_OUTSTANDINGINCONSISTENCIES_000001_meta.json

Outstanding Material Inconsistencies Data Feedback Files will be named using the following format:

<CAT Submitter ID>_<CAT Reporter CRD>_<Correspondent CRD>_<File Generation Date>_<File Kind>_<Group>_<File Type>.<Format Extension>.<Compression Extension>

Example: 123_456_2_20240401_OUTSTANDINGINCONSISTENCIES_000001_data.json.bz2

Sentinel Outstanding Material Inconsistencies Feedback Files will be named using the following format:

<File Generation Date>_OUTSTANDINGINCONSISTENCIES_processed

Example: 20240401_OUTSTANDINGINCONSISTENCIES_processed

Table 20: Elements of an Outstanding Material Inconsistencies Metadata Feedback File

Field Name	Data Type	JSON Object	Include Key	Description
catSubmitterID	Unsigned	Main	R	The ID of the firm that submitted the data to CAT.
catReporterCRD	Unsigned	Main	R	The CRD of the Industry Member for which the Outstanding Material Inconsistencies Feedback File was generated.
correspondentCRD	Unsigned	Main	C	The CRD number of the related introducing broker or correspondent firm whose customer and account data is kept on record at the Industry Member reporting to CAT. Only populated when <i>correspondentCRD</i> is populated in the submission file.
materialInconsistencyCount	Unsigned	Main	R	Total Count of Outstanding Material Inconsistencies.
errorFeedbackFileName	Text (100)	Main	R	Name of the corresponding Material Inconsistencies Data Feedback File.

Table 21: Elements of an Outstanding Material Inconsistencies Data Feedback File

Field Name	Data Type	JSON Object	Include Key	Description
F type	Choice	Main	R	Set to 'materialInconsistency'.
submissionFilename	Text (100)	Main	R	Name of the file in which the CAT Customer was last accepted with an active association to an active FDID.
submissionID	Unsigned	Main	R	The unique Submission ID assigned to the CAIS Reference Data File by the Reference Database-CAT CAIS System . Used to identify the single submission activity. If the same submissionFilename is submitted across multiple submissions, each submission instance will have a separate and unique Submission ID

Field Name	Data Type	JSON Object	Include Key	Description
				value.
inconsistencyEventID	Text (100)	Main	R	Unique identifier assigned by CAT for the specific CAT Customer – by <i>tidValue</i> – having one or more inconsistencies. This ID is used because the CAT NMS Plan Defined PII – including tidValue – of the CAT Customer cannot be returned to the Industry Member after it is submitted to CAT.
customerRecordID	Array of Unsigned Values	Main	R	The <i>customerRecordID</i> , as submitted to the Reference Database CAIS in the <i>submissionFilename</i> , of the record having the inconsistency.
inconsistencyCode	Unsigned	Main	R	The Inconsistency Code of the identified inconsistency on the Customer Record.
identificationDate	Timestamp (String)	Main	R	Date the Material Inconsistency was identified.
inconsistencyDeadline	Timestamp (String)	Main	R	Deadline for resolving the Material Inconsistency.
firmDesignatedID	Array of Text (40)	Main	R	Please see the Full CAIS Industry Member Release Rollout for the Release Dates: An array of up to 10 <i>firmDesignatedIDs</i> , as submitted to the Reference Database CAIS , associated to the record having the inconsistency.

6.4.3. JSON Example for Outstanding Material Inconsistencies Feedback

The following JSON example demonstrates the structure of an Outstanding Material Inconsistencies Metadata Feedback file.

CAIS -Material Inconsistencies Metadata Feedback Filename	123_456_2_20240401_OUTSTANDINGINCONSISTENCIES_000001_meta.json
Feedback File Contents	{ "catSubmitterID": 123, "catReporterCRD": 456, "correspondentCRD": 2, "materialInconsistencyCount": 32 , "errorFeedbackFileName": "123_456_2_20240401_OUTSTANDINGINCONSISTENCIES_000001_data.json.bz2" }

The following JSON example demonstrates the structure of an Outstanding Material Inconsistencies Data Feedback file.

CAIS-Material Inconsistencies Data Feedback Filename	123_456_2_20240401_OUTSTANDINGINCONSISTENCIES_000001_data.json.bz2
Feedback File Contents	<pre> {"type": "materialInconsistency", "submissionFilename": "123_456_20231201_Group11_CAIS_000129.json.bz2", "submissionID": 456389, "inconsistencyEventID": "368453\$24948#555#NULL#2023-02- 28T01:01:26.340000+00:00", "customerRecordID": [367,357], "inconsistencyCode": 30002, "identificationDate": "20240401T140000.00000000", "inconsistencyDeadline": "20240403T170000.00000000", "firmDesignatedID": ["EZAaccount123"]} {"type": "materialInconsistency", "submissionFilename": "123_456_20240104_Group43_CAIS_000861.json.bz2", "submissionID": 835479, "inconsistencyEventID": "320648651\$24948#555#NULL#2023-02- 28T01:01:26.340000+00:00", "customerRecordID": [12], "inconsistencyCode": 40004, "identificationDate": "20240401T140000.00000000", "inconsistencyDeadline": "20240403T170000.00000000", "firmDesignatedID": ["MyTestEntity"]} {"type": "materialInconsistency", "submissionFilename": "123_456_20240104_Group32_CAIS_963482.json.bz2", "submissionID": 596634, "inconsistencyEventID": "34698132\$24948#555#NULL#2023-02- 28T01:01:26.340000+00:00", "customerRecordID": [68], "inconsistencyCode": 30004, "identificationDate": "20240401T140000.00000000", "inconsistencyDeadline": "20240403T170000.00000000", "firmDesignatedID": ["Account987", "ABC12"]} </pre>

6.5. Outstanding Rejections

Rejections identified during Data Validation that remain unrepaired at the time of the Outstanding Rejections scan will be returned in the Outstanding Rejections Feedback File. Specifically, all records submitted by 8:00 a.m. Eastern Time and rejected by [the Reference DatabaseCAIS](#) will participate in the once-daily Outstanding Rejections scan, along with records that were previously rejected and remain unrepaired. Feedback containing any outstanding rejections will be delivered in a metadata file and data file set by 5:00 p.m. Eastern Time. Records submitted after the cut-off time and subsequently rejected by [the Reference DatabaseCAIS](#) will participate in the following day's Outstanding Rejections scan.

[On January 13, 2026, the SEC approved an amendment \("the Amendment"\) to the CAT NMS Plan relating to the Reference Database. The Amendment eliminates requirements that Industry Members report Customer names, Customer addresses, account names, account addresses, years of birth, authorized trader names and Employer Identification Numbers \("EINs"\). These reporting changes will be implemented in two phases. Phase 1A allows the continued acceptance of submissions from Industry Members and CAT Reporting Agents that include names, addresses, years of birth and EINs, but such information will not be processed. Thus, in Phase 1A, no new rejections will be generated relating to names, addresses, years of birth and EINs. Additionally, effective with the deployment of Phase 1A, Industry Members will not be required to repair any outstanding rejections related to names, addresses, years of birth, EINs and *updateNotification*. See Appendix B for the retired error codes. In Phase 1B, outstanding rejections related to names, addresses, years of birth, EINs and *updateNotification* will be automatically reconciled. See CAT Alert 2026-01 for more information.](#)

The following additional rules apply to Outstanding Rejections Feedback Files:

1. Feedback Files for Outstanding Rejections will be accessible via the Reference Database CAIS Reporter Portal —CAIS and under the /submitterID/cat/cais/feedback directory in the CAT Submitters home directory on the Feedback SFTP server.
2. A sentinel file will be posted to the SFTP directory to indicate that the Outstanding Rejections scan ran successfully and is complete. The sentinel file will be empty.
3. If there are no outstanding rejections, only a sentinel file will be posted to the SFTP folder to indicate the operation ran successfully but did not produce any results.
4. The Outstanding Rejections Feedback will include a metadata and data file set. The data file will include details about the rejections and the metadata file will include the count of Customer and Account FDID record rejections contained within the data file.
5. A set(s) of metadata file and data file will be delivered for each combination of CAT Submitter, CAT Reporter CRD and Correspondent CRD.
6. The Outstanding Rejections Data Feedback File will be limited to 400,000 *rejectionIDs*. If the *catReporterCRD* and *correspondentCRD* combination exceeds 400,000 *rejectionIDs*, an additional set(s) of metadata and data files will be delivered.

Outstanding Rejections Metadata Feedback Files will be named using the following format:

```
<CAT Submitter ID>_<CAT Reporter CRD>_<Correspondent CRD>_<File Generation Date>_<File Kind>_<Group>_<File Type>.<Format Extension>
```

Example: 99999999_555_2_20240401_OUTSTANDINGREJECTIONS_000001_meta.json

Outstanding Rejections Data Feedback Files will be named using the following format:

```
<CAT Submitter ID>_<CAT Reporter CRD>_<Correspondent CRD>_<File Generation Date>_<File Kind>_<Group>_<File Type>.<Format Extension>.<Compression Extension>
```

Example: 99999999_555_2_20240401_OUTSTANDINGREJECTIONS_000001_data.json.bz2

The Outstanding Rejections Sentinel Feedback File will be named using the following format:

```
<File Generation Date>_OUTSTANDINGREJECTIONS_processed
```

Example: 20240402_OUTSTANDINGREJECTIONS_processed

Table 22: Elements of an Outstanding Rejections Metadata Feedback File

Field Name	Data Type	JSON Object	Include Key	Description
catSubmitterID	Unsigned	Main	R	The ID of the firm that submitted the data to CAT.
catReporterCRD	Unsigned	Main	R	The CRD number assigned to the Industry Member to which the data within the submission file belongs.
correspondentCRD	Unsigned	Main	C	The CRD number of the related introducing broker or correspondent firm whose customer and account data is kept on record at the Industry Member reporting to CAT. Only populated when <i>correspondentCRD</i> was populated in the submission file.
outstandingFDIDCount	Unsigned	Main	R	Total count of outstanding rejected FDID Records that have not been repaired.
outstandingCustomerCount	Unsigned	Main	R	Total count of outstanding rejected Customer Records that have not been repaired.
errorFeedbackFileName	Text (100)	Main	R	Name of the corresponding Outstanding Feedback File

Table 23: Elements of an Outstanding Rejections Data Feedback File

Field Name	Data Type	JSON Object	Include Key	Description
type	Choice	Main	R	Indicates if the rejected record was an FDID or Customer <u>record</u> rejection. Values: <ul style="list-style-type: none"> FDIDRejection – Indicates the FDID Record was rejected CustomerRejection – Indicates the Customer Record was rejected.
rejectedFDID	Text (40)	Main	C	The <i>firmDesignatedID</i> , as submitted to <u>the Reference DatabaseCAIS</u> , of the record having the data validation error. Only populated on the FDID rejections.
submissionFilename	Text (100)	Main	R	Name of the file in which the rejected FDID or Customer <u>record</u> was last submitted.
submissionID	Unsigned	Main	R	The unique Submission ID assigned to the <u>ReferenceCAIS Data File</u> by the <u>Reference DatabaseCAT CAIS system</u> . Used to identify the single submission activity. If the same submissionFilename is submitted across multiple submissions, each submission instance will have a separate and unique Submission ID value.
rejectionID	Unsigned	Main	R	Identifier assigned by CAT to uniquely identify a rejected record.

fdidRecordID	Unsigned	Main	C	The <i>fdidRecordID</i> , as submitted to the Reference DatabaseCAIS , of the record having the data validation error. Only populated on FDID rejections.
errorCode	Unsigned	Main	R	The error code of the data validation error.
customerRecordID	Array of Unsigned Values	Main	C	The <i>customerRecordID</i> , as submitted to the Reference DatabaseCAIS , of the record having the data validation error. Only populated on Customer Record rejections or when an FDID Record rejects because an associated Customer Record rejected.
rejectionTimestamp	Timestamp (String)	Main	R	Indicates the time at which the data validation error was originally identified.
addrType	Choice	Main	C	The <i>addrType</i> , as submitted to the Reference DatabaseCAIS , of the record having the data validation error. Only populated when an address error resulted in the rejection. When populated, either <i>firmDesignatedID</i> or <i>customerRecordID</i> will be populated. VALUES: <ul style="list-style-type: none"> • ADDRESS1 – The first Address Record of the Customer • ADDRESS2 – The second Address Record of the Customer • ADDRESS3 – The third Address Record of the Customer • ADDRESS4 – The fourth Address Record of the Customer
largeTraderRecordID	Unsigned	Main	C	The <i>largeTraderRecordID</i> , as submitted to the Reference DatabaseCAIS , of the record having the data validation error. Only populated on Large Trader rejections.
authTraderNameID	Unsigned	Main	C	The <i>authTraderNameID</i> , as submitted to the Reference DatabaseCAIS , of the record having the data validation error. Only populated when an Authorized Trader Name error resulted in the rejection.
customerRejectionEventID	Text (100)	Main	C	A unique identifier assigned by CAT for the specific CAT Customer – by <i>tidValue</i> – having one or more rejections. If the same CAT Customer (<i>tidValue</i>) is subsequently rejected, it will be assigned the same unique identifier. This ID is used because the CAT NMS Plan Defined PII – including tidValue – of the CAT Customer cannot be returned to the Industry Member after it is submitted to CAT.

6.5.1. JSON Examples for Outstanding Rejections Metadata and Data Feedback

The following JSON example demonstrates the structure of an Outstanding Rejections Metadata Feedback File.

Outstanding Rejections Metadata Feedback Filename	99999999_555_2_20240401_OUTSTANDINGREJECTIONS_000001_meta.json
Feedback File Contents	<pre>{ "catSubmitterID": 99999999, "catReporterCRD": 555, "correspondentCRD": 2, "outstandingFDIDCount": 23, "outstandingCustomerCount": 12, "errorFeedbackFileName": "99999999_555_2_20240401_OUTSTANDINGREJECTIONS_000001_data.json.bz2" }</pre>

The following JSON example demonstrates the structure of an Outstanding Rejections Data Feedback File.

Outstanding Rejections Data Feedback Filename	99999999_555_2_20240401_OUTSTANDINGREJECTIONS_000001_data.json.bz2
Feedback File Contents	<pre>{ "type": "FDIDRejection", "rejectedFDID": "ExAccount4", "submissionFilename": "99999999_555_20240312_Group03_CAIS_000001.json.bz2", "submissionID": 61045, "rejectionID": 61045000000002, "fdidRecordID": 1, "errorCode": 22042, "customerRecordID": [34], "rejectionTimestamp": "20240312T125431.606107000"} {"type": "FDIDRejection", "rejectedFDID": "ExAccount7", "submissionFilename": "99999999_555_20230901_Group126_CAIS_000123.json.bz2", "submissionID": 611091, "rejectionID": 61045000000003, "fdidRecordID": 902, "errorCode": 22018-22055, "rejectionTimestamp": "20230901T125431.606107000", "addrType": "ADDRESS1"} {"type": "FDIDRejection", "rejectedFDID": "FDID-123", "submissionFilename": "99999999_555_20230901_Sept1_CAIS_636988.json.bz2", "submissionID": 559036, "rejectionID": 55903600002583, "fdidRecordID": 36710, "errorCode": 22017, "rejectionTimestamp": "20230901T125431.606107000", "largeTraderRecordID": 347} {"type": "FDIDRejection", "rejectedFDID": "Account.qwerty", "submissionFilename": "99999999_555_20230901_Sept1_CAIS_636988.json.bz2", "submissionID": 559036, "rejectionID": 55903600002539, "fdidRecordID": 3606, "errorCode": 22074, "rejectionTimestamp": "20230901T125431.606107000", "authTraderNameID": 836} {"type": "FDIDRejection", "rejectedFDID": "Account.qwerty", "submissionFilename": "99999999_555_20230901_Sept1_CAIS_636988.json.bz2", "submissionID": 559036, "rejectionID": 55903600002539, "fdidRecordID": 3606, "errorCode": 22005, "rejectionTimestamp": "20230901T125431.606107000"} }</pre>

	<pre> {"type": "FDIDRejection", "rejectedFDID": "AcctXYZ", "submissionFilename": "99999999_555_01122024_Group43_CAIS_000861.json.bz2", "submissionID": 563921, "rejectionID": 61045000000003, "fdidRecordID": 1, "errorCode": 22048, "rejectionTimestamp": "20240112T125431.606107000"} {"type": "CustomerRejection", "submissionFilename": "99999999_555_20240112_Group43_CAIS_000861.json.bz2", "submissionID": 563921, "customerRejectionEventID": "1078\$24948#250#NULL#2023-02- 28T01:01:26.340000+00:00", "rejectionID": 563921000000023, "customerRecordID": [1, 4, 46, 311], "errorCode": 2252418, "addrType": "ADDRESS1", "rejectionTimestamp": "20240112T125431.354705000"} {"type": "CustomerRejection", "submissionFilename": "99999999_555_20240112_Group03_CAIS_000001.json.bz2", "submissionID": 61045, "customerRejectionEventID": "1078\$24948#555#NULL#2023-02- 28T01:01:26.340000+00:00", "rejectionID": 61045000003251, "customerRecordID": [22], "errorCode": 22523, "rejectionTimestamp": "20240112T125431.354705000"} {"type": "CustomerRejection", "submissionFilename": "99999999_555_202401121_Group43_CAIS_000861.json.bz2", "submissionID": 835479, "customerRejectionEventID": "1078\$24948#250#NULL#2023-02- 28T01:01:26.340000+00:00", "rejectionID": 8354790000023678, "customerRecordID": [6319], "errorCode": 22900, "rejectionTimestamp": "20240112T125431.354705000"} </pre>
--	---

6.6. Repairs, ~~and Corrections~~ and Resolutions

Errors found during the data validation process must be repaired. Errors not found during processing but self-identified by the Industry Member or its CAT Reporting Agent subsequent to transmission must be corrected. ~~Data inconsistencies identified during inconsistency scans must be resolved.~~

Repairs and self-identified corrections are made by submitting the current state of the FDID Record with all its current LTID and CAT Customer associations. The reporting of repairs and corrections is facilitated in the Reference DatabaseCAT CAIS through submissions via SFTP and the Reference DatabaseCAT Reporter Portal—CAIS. Industry Member-initiated corrections of data that had been accepted in prior Reference DatabaseCAT CAIS submissions are acceptable at any time and will be processed the same as any other update to the original record. The new data provided on the corrected record will update the currently stored record in the Reference DatabaseCAT CAIS. Historical versions of the record will be made available for regulatory use.

The following rejection repair ~~and inconsistency resolution~~ scenarios are detailed below:

- Correction of Reference Database CAT CAIS submission files having a File Integrity Error
- Repair of Data Validation Errors
- ~~Resolution of Material Inconsistencies~~

6.6.1. File Integrity Errors

A file integrity error resulting in the inability to process a particular submission file can be corrected by submission of a new file having the same submission filename, with corrected data that passes file integrity checks.

If a file is received having the same submission filename as a prior submission that did not have a file integrity error, the new submission file will be rejected as a file integrity warning, alerting the Industry Member that it has reused the same submission filename as a file that was previously accepted by [the Reference DatabaseCAT CAIS](#). The Industry Member does not have to take further action to correct for this submission file, however the data included in the submission file will not be processed through Data Validation nor accepted into [the Reference DatabaseCAT CAIS](#).

6.6.2. Data Validation Errors

Data Validation Errors found during processing result in a rejection that must be repaired. [The Reference DatabaseCAIS](#) tracks historical repairs and the lineage of replacements. When a properly formed FDID or [CAT](#) Customer was submitted to [the Reference DatabaseCAIS](#), a rejection must be repaired by resubmitting the FDID Record in its current state (with all LTID and [CAT](#) Customer associations), with corrected data. When a malformed FDID or [CAT](#) Customer was submitted to [the Reference DatabaseCAIS](#), a rejection must be repaired via the *correctionList*. Rejections for FDIDs or [CAT](#) Customers that were not required to be submitted to [the Reference DatabaseCAIS](#) may optionally be deleted via the *correctionList*.

6.6.2.1. Use of the *correctionList*

The *correctionList* is a feature of the [ReferenceCAIS](#) Data File available to support repair of Data Validation Errors through the submission of one or more Correction Action Records. All Data Validation Errors (Error Codes 22001 through 23999) may be repaired by submitting a *correctionAction* of 'DELETE'. A *correctionAction* of 'DELETE' does not delete the FDID or Customer record from the [Reference DatabaseCAIS system](#); it deletes the rejection. Any FDID Records or Customer Records that are required to be reported to [the Reference DatabaseCAIS](#) but were submitted with a *correctionAction* of 'DELETE' must be accepted in its full current state by [the Reference DatabaseCAIS](#) in a prior or subsequent submission.

When a malformed FDID or [CAT](#) Customer was submitted to [the Reference DatabaseCAIS](#) and subsequently rejected, it must be repaired by submitting a Correction Action Record and a *correctionAction* of 'CORRECTION' or 'DELETE'. Repair credit will not be given if the corresponding

rejectionID is not included in the repairing submission. Records failing Data Validation for the following reasons require use of the *correctionList* within the [ReferenceCAIS](#) Data File:

1. Missing or Invalid *firmDesignatedID* (Error Code 22001)
 2. Malformed TID Record (Error Code 22900)
 3. *customerRecordID* not present in paired Transformed Identifiers File (Error Code 22526)
 4. Missing or Invalid *customerRecordID* in paired [ReferenceCAIS](#) Data File (Error Code 22501)
 5. Paired TID record failed validation (Error Code 22914)
- To delete the rejection, the Industry Member is required to populate the following within the *correctionList*: the *rejectionID* and *correctionAction* of 'DELETE'.
 - To repair the rejection, the Industry Member is required to populate the following within the *correctionList*: the *rejectionID* and *correctionAction* of 'CORRECTION'.

Further, in the 'CORRECTION' scenario:

- For repairing a Missing or Invalid *firmDesignatedID* (Error Code 22001) – the repairing FDID Record must be included within the current submission and pass all data validation checks, or the repairing FDID Record must have been accepted by [the Reference DatabaseGAT CAIS](#) in a prior submission.
- For repairing a Malformed TID Record (Error Code 22900) or a TID record that failed to pair (Error Code 22914) – the repairing Customer Record must be included in the current submission and pass all data validation checks.
- For a *customerRecordID* in the Transformed Identifiers File (Error Code 22526) or the Data File (Error Code 22501) – the repairing Customer Record must be included in the current submission and pass all data validation checks.

If the repairing record fails Data Validation again for the same reason (Error Code 22001, 22900, 22526, 22501, or 22914), a separate rejection will be created against the repairing record, and the original rejection will remain open for repair. Thus, the Industry Member will have two rejections to repair. If the repairing record does not fail Data Validation again for the same reason (Error Code 22001, 22900, 22526, 22501, or 22914), the original rejection will be closed as repaired. However, if the repairing record

fails a separate data validation check, a new rejection will be recorded and tracked against the timeline for repair of the original error. Malformed *largeTraderIDs* do not require use of the *correctionList* and can be repaired by resubmitting the full FDID Record, including all associations, with a valid *largeTraderID* value.

6.6.2.2. Repair of Other Data Validation Errors

If a submission record fails data validation checks for any reasons other than the format of the FDID or TID value or failure to pair the *customerRecordID*, rejections must be repaired by resubmitting the FDID Record in its current state (with all LTID and CAT Customer associations), with corrected data. If the resubmission fails for the same data validation, the prior rejection for the record will be considered repaired, and a new rejection will be created, however the new rejection will be tracked against the timeline for repair of the original error. If the repairing submission fails validation against a separate field, the original rejection will be closed as repaired, and a new rejection will be created for the separate field validation failure, however the new rejection will be tracked against the timeline for repair of the original error.

Note that implicitly ending a rejected record, for example by implicitly ending a Customer Record, will not repair any unrepaired rejections. Rejections can only be repaired by resubmitting the FDID Record (with all LTID and CAT Customer associations) with corrected data.

6.6.3. ~~Material Inconsistencies~~

~~When a Material Inconsistency is identified, the Industry Member must always take action by either:~~

- ~~• Confirming the accuracy of the Customer Record it submitted to CAIS by resubmitting the entire FDID Record in its current state with all required LTID and Customer associations and including the *updateNotification* field populated with 'true'.~~
- ~~• Or submit an update to the Customer Record by resubmitting the entire FDID Record with all required LTID and Customer associations and the updated Customer information and including the *updateNotification* field populated with 'true'.~~

~~The following additional rules apply:~~

- ~~1. Acceptance of a Customer Record with *updateNotification* populated with 'true' will initiate a process to determine if a Material Inconsistency exists for the same Customer and CAT Reporter-CRD combination. If found, the Material Inconsistency will be resolved.~~
- ~~2. Acceptance of a Customer Record with *updateNotification* populated with 'true' in response to an interfirm Material Inconsistency will be considered as a one-time attestation of the Customer data~~

received by the CAT Reporter CRD. The one-time attestation will prevent the CAT Reporter CRD from receiving subsequent interfirm Material Inconsistencies for that Customer.

3. Resolving a Material Inconsistency does not require the Industry Member to contact its Customer to confirm the information. See [FAQ Q55](#) for more information.
4. If an Industry Member attempts to resolve a Material Inconsistency, but the submission record is rejected, the Material Inconsistency will remain unresolved and the original inconsistency resolution deadline will remain the same.
5. If an Industry Member resolves an intrafirm inconsistency and then subsequently creates another intrafirm inconsistency before the next Material Inconsistency process, the original inconsistency will be resolved and new inconsistency will be opened.

6.6.4. Proactive Updates of Customer Record

If an Industry Member knows that it is submitting Customer data that would result in a Material Inconsistency notification, in some circumstances, it is possible to proactively use *updateNotification* to avoid an intrafirm Material Inconsistency. When the Industry Member includes this proactive notification, CAIS will not create an intrafirm Material Inconsistency for the reported Customer.

Proactive Updates Not Allowed Effective with the implementation of Error Code 22544, this section will no longer apply. Please see the [Full CAIS Industry Member Release Rollout](#) for the Release Dates of Error Code 22544: Because of the requirement to hash the EIN (the hashed value is reported in the *tidValue* field), proactive use of *updateNotification* is not possible for Legal Entity Customers where the EIN is the Input Identifier and reported in plaintext in the *ein* field. For example, if Industry Member A reported a specific *tidValue* and *ein* combination in Submission 1 and later realized that the *ein* value was incorrect (but the *tidValue* was correct), it must report the correct *ein* value in a second submission without populating *updateNotification* with 'true'. This will result in Inconsistency Code 30003 (Inconsistent data for *ein* within the Industry Member) which Industry Member A must resolve as described in [Section 6.6.3](#).

It should be noted that Industry Members cannot proactively populate *updateNotification* with 'true' in the second submission. Doing so would result in a Material Inconsistency notification that must be resolved.

Proactive Updates Allowed:

There are two scenarios where use of proactive notification is allowable. First, updating a Customer's *yearOfBirth* and second, changing certain foreign Customers from Natural Persons to Legal Entities (or vice versa). This can be done proactively by populating *updateNotification* with 'true'.

Example Showing Proactive Use to Update a Year of Birth:

If Industry Member A reported a specific *tidValue* and *yearOfBirth* combination in Submission 1 and later realized that the *yearOfBirth* value was incorrect (but the *tidValue* was correct), it must report the correct *yearOfBirth* value in a subsequent submission. If Industry Member A proactively populates

~~updateNotification~~ with 'true' in the subsequent submission, it would not receive a Material Inconsistency notification. If Industry Member A does not appropriately use the ~~updateNotification~~ function, it will be notified that the Customer data it submitted to CAT resulted in a Material Inconsistency. The Industry Member must then follow the procedure described in Section 6.6.3.

Example Showing Proactive Use to Change Customer Type:

~~If Industry Member A reported a specific combination of *tidValue*, *foreignTIDType* (specifically the 'OTHGOVT' or 'NATIONALID' values), and *foreignTIDCountryCd* in the Transformed Identifiers File, and reported the Customer in the *naturalPersonCustomerList* in paired Submission 1 and later realized that the Customer should have been reported in the *legalEntityCustomerList* (but the *tidValue* was correct), it must report the Customer in the *legalEntityCustomerList* in a subsequent submission. If Industry Member A proactively populates ~~updateNotification~~ with 'true' in the subsequent submission, it would not receive a Material Inconsistency notification. If Industry Member A does not appropriately use the ~~updateNotification~~ function, it will be notified that the Customer data it submitted to CAT resulted in a Material Inconsistency. The Industry Member must then follow the procedure described in Section 6.6.3. The same would be true if the foreign Customer was originally reported in the *legalEntityCustomerList* (with a correct *tidValue*) but should have been reported in the *naturalPersonCustomerList*.~~

6.7. FDID Reconciliation Report

The FDID Reconciliation Report in the Reference Database CAT Reporter Portal –CAIS allows an entitled user to upload a text file containing up to 1,000 FDIDs and retrieve a report in .csv format which indicates, for each specified FDID for the selected CAT Reporter CRD, the *firmDesignatedID* value, *correspondentCRD* value (if applicable), FDID Status, Associated Customer Count, Last Accepted File Name, Last Accepted File Version, masked associated LTIDs (in the format xxxxx999-9999), and an LTID Status for each associated LTID.

Industry Members will be able to view all specified FDIDs submitted (either self-submitted or submitted by the CAT Reporting Agent) that were accepted into the Reference DatabaseCAIS. The CAT Submitter will be able to view the FDIDs submitted to, and accepted by, the Reference DatabaseCAIS for each CAT Reporter CRD for which it has an active reporting relationship. For more information on the FDID Reconciliation Report, please see the Reference DatabaseCAT-CAIS Reporter Portal User Guide.

FDID Reconciliation Reports created by the Reference Database CAT-CAIS will be named using the following format:

FDID_reconciliation_report_<Date of Generation>_<Timestamp of
Generation>.<Format Extension>

Example:

FDID_reconciliation_report_20220101_150948_EDT.csv

7. Testing

CAT will provide an environment for testing that mirrors the current functionality of the [Reference Database CAT CAIS](#) Production Environment, as well as functionality for the next release version of the [Reference Database CAT CAIS](#) environment when available. The [Reference Database CAT CAIS](#) Test Environment will automatically determine which specification version Industry Members and CAT Reporting Agents are using for submissions. If error reporting formats change, Industry Members and CAT Reporting Agents will receive feedback in the current and new specification via SFTP, as well as have access to current/new [Reference Database CAT](#) Reporter Portal ~~—CAIS~~ URLs for specification changes that impact the [Reference Database CAT](#) Reporter Portal ~~—CAIS~~. Current/new connectivity changes will also be supported concurrently.

Industry Members and CAT Reporting Agents must test their submissions using the Test Environment before they begin submitting to the Production Environment.

The Test Environment is available 24 hours a day, 6 days a week. Refer to the CAT website for contact information and hours of operation for support.

Industry Members and CAT Reporting Agents connect to the Test Environment in the same manner they would connect to the Production Environment. However, for the connection to the Test Environment, one or more alternate IP addresses or URLs may be used.

Testing does not relieve an Industry Member of its responsibilities to submit production data to the CAT System.

8. Additional Information

8.1. Public Website

The CAT public website, www.catnmsplan.com, is available via the public internet, and is hosted outside the CAT secure network. The CAT public website provides information about CAT, including links to SEC Rule 613, Participant and Industry Member Technical Specifications, FAQs, training materials, and CAT Helpdesk contact information.

Web announcements will be made available on the public website. You can also [subscribe](#) to receive email notifications regarding changes to the website and system status notifications. These announcements are used to post information related to the operation of CAT.

Contact help@finracat.com for any questions and/or feedback regarding this document.

Appendices

Appendix A: Change Release Management Process

Following publication of version 1.0, changes to this ~~CAT Reporting Customer & Account Reference Database~~ Technical Specification for Industry Members (“Technical Specifications”) will be released as follows:

- All proposed amendments to the Technical Specifications will be made in accordance with the CAT NMS Plan, including being approved or deemed approved (as applicable) by the Consolidated Audit Trail, LLC Operating Committee.
- Prior to the go-live date for any system changes set forth in the Technical Specifications:
 - ◆ A new Technical Specifications will be posted to the CAT public website, www.catnmsplan.com.
 - ◆ A notice will be posted on the CAT NMS Plan public website with a summary of changes, the go-live date for the changes and links to relevant information.
 - ◆ One or more email alerts will be sent to the email address(es) on file for the CAT Reporters with a summary of changes set forth in the revised Technical Specifications, the go-live date for the changes and links to relevant information.
 - ◆ Industry Members will be permitted to perform testing of the revised Technical Specifications in advance of the go-live date for the changes. Information on such testing will be set forth in the notices and alerts described above.
 - ◆ As the go-live date approaches, Industry Members will be able to conduct testing and will receive support from the Plan Processor to prepare for production reporting using the revised Technical Specifications format. The revised Technical Specifications will include a summary list of changes as well as a table listing the specific areas of the document where the changes have been made.

Appendix B: Error Codes

This section defines the error and warning codes generated by [the Reference Database CAT CAIS](#). Each code is defined to include the reason for the error or warning, and the associated fields. Errors found during [Reference Database CAT CAIS](#) processing must be repaired. Warnings are not subject to further processing and Industry Members are not required to take any action on them. Codes are assigned in ranges to represent similar types of errors within the same range, related by validation type and/or by record type. Codes are organized by the CAT Processing stages including:

- File Integrity
- Data Validation
- Data Inconsistency Checking

B.1 File Integrity Errors

The table below contains error messages that are associated with file integrity. Errors are associated with files, filenames, and metadata within submission files (such as record counts).

Table 24: [ReferenceCAIS](#) Data File Integrity Errors

Error Code	Error Code Description	Explanation	Warning/Error
21001	Duplicate File	A file with the same base name was previously accepted by the Reference Database CAT CAIS .	Error
21002	Missing or Invalid CAT Submitter ID	CAT Submitter ID is missing or invalid.	Error
21003	Missing or Invalid CAT Reporter CRD	CAT Reporter CRD is missing or is not a valid Market Participant for the Generation Date.	Error
21004	Missing or Invalid File Generation Date	File Generation Date is missing or is not a valid date.	Error
21005	Reserved	Reserved for future use	
21006	Unauthorized CAT Submitter ID	CAT Submitter ID has not been authorized to submit for the CAT Reporter CRD. Verify that the CAT Submitter ID and CAT Reporter CRD in the filename have a transmitting relationship.	Error
21007	Missing or Invalid <i>fdidRecordCount</i>	The <i>fdidRecordCount</i> in the ReferenceCAIS Data File is missing, is a negative number or does not match the count of FDID Records within the ReferenceCAIS Data File.	Error
21008	Missing or Invalid <i>version</i>	Schema <i>version</i> in the ReferenceCAIS Data File is missing or invalid.	Error
21009	Reserved File exceeds maximum records	Reserved for future use A single CAIS Data File uploaded via the CAT Reporter Portal – CAIS must not contain more than	Error

Error Code	Error Code Description	Explanation	Warning/Error
	allowed for Web upload	100,000 FDID Records.	
21010	Invalid <u>CAIS Reference Database</u> Filename	<u>CAIS Reference Database</u> submission filenames must follow the defined format. Submission files uploaded via the <u>Reference Database CAT Reporter Portal –CAIS</u> or SFTP may not use a Group value of 'caisweb'.	Error
21011	<u>ReferenceCAIS</u> Data File not Readable	<u>ReferenceCAIS</u> Data File format is not readable as it is not in a valid JSON format, contains an incorrect delimiter, or does not follow the prescribed schema.	Error
21012	Unknown Attribute Name	The file contains a file level attribute that is not known under the reported schema <i>version</i> .	Error
21013	<u>ReferenceCAIS</u> Data File cannot be Uncompressed	The <u>ReferenceCAIS</u> Data File was not properly compressed and cannot be processed.	Error
21014	Paired Transformed Identifiers File not received	The paired Transformed Identifiers File for the <u>ReferenceCAIS</u> Data File was not received in time or had a file integrity error.	Error
21016	Missing or Invalid <i>naturalPersonCustomerRecordCount</i>	The <i>naturalPersonCustomerRecordCount</i> in the <u>ReferenceCAIS</u> Data File is missing, is a negative number, or does not match the count of Natural Person Customer Records within the file.	Error
21017	Missing or Invalid <i>legalEntityCustomerRecordCount</i>	The <i>legalEntityCustomerRecordCount</i> in the <u>ReferenceCAIS</u> Data File is missing, is a negative number, or does not match the count of Legal Entity Customer Records within the file.	Error
21018	Invalid <i>correspondentCRD</i>	When populated, <i>correspondentCRD</i> must be properly formatted and within the allowable range for CRD numbers.	Error
21019	Duplicate occurrences of a field exist	A field can only appear at most one time per JSON object.	Error
21020	Reserved	Reserved for future use	
21021	Reset in progress	When an Industry Member has requested its data be reset and the reset operation is in progress, the Industry Member nor any of its CAT Submitters can submit files to <u>the Reference DatabaseCAIS</u> .	Error

Table 25: Transformed Identifiers File Integrity Errors

Error Code	Error Code Description	Explanation	Warning/Error
21501	Duplicate File	A file with the same base name was previously accepted by <u>the Reference Database CAT CAIS</u> .	Error
21504	Missing or Invalid File Generation Date	File Generation Date is missing or is not a valid date.	Error
21505	Reserved	Reserved for future use	

Error Code	Error Code Description	Explanation	Warning/Error
21507	Missing or Invalid <i>tidRecordCount</i>	The <i>tidRecordCount</i> in the Transformed Identifiers File is missing, is a negative number, or does not match the count of TID Records within the file.	Error
21508	Missing or Invalid <i>version</i>	Schema <i>version</i> in Transformed Identifiers File is missing or invalid.	Error
21509	Reserved File exceeds maximum records allowed for web upload	Reserved for future use A single Transformed Identifiers File uploaded via the CAT Reporter Portal — CAIS must not contain more than 100,000 TID Records.	Error
21510	Invalid Transformed Identifiers Filename	Transformed Identifiers Filenames must follow the defined format.	Error
21511	Transformed Identifiers File not Readable	Transformed Identifiers File format is not readable as it is not in a valid JSON format, contains an incorrect delimiter, or does not follow the prescribed schema.	Error
21512	Unknown Attribute Name	The file contains a file level attribute that is not known under the reported schema <i>version</i> .	Error
21513	Transformed Identifiers File cannot be Uncompressed	The Transformed Identifiers File was not properly compressed and cannot be processed.	Error
21514	Paired Reference CAIS Data File not received	The paired ReferenceCAIS Data File for the Transformed Identifiers File was not received in time or had a file integrity error.	Error
21516	Duplicate occurrences of a field exist	A field can only appear at most one time per JSON object.	Error
21517	Reserved	Reserved for future use	
21518	Reserved	Reserved for future use	
21519	Reserved	Reserved for future use	

B.2 Data Validation Errors

The table below contains error messages that are associated with Data Validation. Error codes are associated with specific fields within a submission record.

Table 26: Data Validation Errors

Error Code	Error Code Description	Explanation	Warning/Error
22001	Missing or Invalid <i>firmDesignatedID</i>	<i>firmDesignatedID</i> must be populated in the correct format for each FDID Record within the file. Affected records will not be processed for further validation checks. Refer to Section 3.11 — Special Rules Regarding FDID Characters Section 3.9 – Special Rules Regarding FDID Characters for additional details.	Error

Error Code	Error Code Description	Explanation	Warning/Error
22002	Duplicated <i>firmDesignatedID</i>	Each <i>firmDesignatedID</i> must be present in the submission file only once. Affected records will not be processed for further validation checks.	Error
22003	Missing or Invalid <i>fdidRecordID</i>	<i>fdidRecordID</i> must be present and populated for each FDID Record within the file. Affected record will not be processed for further validation checks.	Error
22004	Duplicated <i>fdidRecordID</i>	Each <i>fdidRecordID</i> must be present in the submission file only once. Affected records will not be processed for further validation checks.	Error
22005	Missing or Invalid <i>fdidType</i>	<i>fdidType</i> must be present and populated with one of the allowable values.	Error
22006	Duplicated <i>largeTraderID</i>	Each <i>largeTraderID</i> must be present only once for a single FDID Record.	Error
22007	Missing or Invalid format of <i>fdidDate</i>	<i>fdidDate</i> must be populated in the correct format. Affected record will not be processed for further validation checks.	Error
22008	Missing or Invalid <i>fdidEndDate</i>	When populated, <i>fdidEndDate</i> must be in the correct format. Must be populated if <i>fdidEndReason</i> is populated.	Error
22009	<i>fdidEndDate</i> set prior to <i>fdidDate</i>	When populated, <i>fdidEndDate</i> must be equal to or later than <i>fdidDate</i> .	Error
22010	Missing or Invalid <i>fdidEndReason</i>	When populated, <i>fdidEndReason</i> must be populated with one of the allowable values. Must be populated if <i>fdidEndDate</i> is populated.	Error
22011	Missing or Invalid <i>replacedByFDID</i>	When populated, <i>replacedByFDID</i> must be in the correct format for <i>firmDesignatedID</i> . Must be populated if <i>fdidEndReason</i> is 'REPLACED'.	Error
22012	Missing or Invalid format of <i>largeTraderID</i>	When populated, <i>largeTraderID</i> must be in the correct format for either a Large Trader ID or an Unidentified Large Trader ID. Must be populated for each Large Trader Record. Affected record will not be processed for further validation checks.	Error
22013	Missing or Invalid <i>largeTraderRecordID</i>	<i>largeTraderRecordID</i> must be present and populated for each Large Trader Record within the file. Affected record will not be processed for further validation checks.	Error
22014	Duplicated <i>largeTraderRecordID</i>	Each <i>largeTraderRecordID</i> reported for a single FDID Record within the file must be present only once.	Error
22015	Missing or Invalid <i>ltidEffectiveDate</i>	<i>ltidEffectiveDate</i> must be populated in the correct format.	Error
22016	Missing or Invalid <i>ltidEndDate</i>	When populated, <i>ltidEndDate</i> must be in the correct format. Must be populated if <i>ltidEndReason</i> is populated.	Error
22017	Missing or Invalid <i>ltidEndReason</i>	When populated, <i>ltidEndReason</i> must be populated with one of the allowable values. Must be populated if <i>ltidEndDate</i> is populated.	Error
22018	Unknown Field Name	The record contains a field that is not known under the reported schema <i>version</i> .	Error

Error Code	Error Code Description	Explanation	Warning/Error
22024	<i>replacedByFDID</i> must not be equal to <i>firmDesignatedID</i>	When populated, <i>replacedByFDID</i> must be a different value than the <i>firmDesignatedID</i> .	Error
22028	<i>ItidEndDate</i> set prior to <i>ItidEffectiveDate</i>	<i>ItidEndDate</i> must not be set to a value prior to the <i>ItidEffectiveDate</i> .	Error
22034	Data type violation – FDID Record	FDID Record contains one or more field values that violate the data type for the field.	Error
22035	Improper Use of Address Lines for the FDID Record	For an FDID Record: <i>addrLine2</i> must not be present and populated unless <i>addrLine1</i> is also present and populated. <i>addrLine3</i> must not be present and populated unless <i>addrLine2</i> and <i>addrLine1</i> are also present and populated. <i>addrLine4</i> must not be present and populated unless <i>addrLine3</i> , <i>addrLine2</i> and <i>addrLine1</i> are present and populated. <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u>	Error
22036	Missing or Invalid <i>city</i> for the FDID Record	<i>city</i> must be present and populated with a valid value for each Address Record present for each FDID Record within the file. <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u>	Error
22037	Missing or Invalid <i>regionCode</i> for the FDID Record	<i>regionCode</i> must be present and populated for each Address Record present for each FDID Record within the file if the <i>countryCode</i> included has a corresponding list of regions in Appendix E. <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u>	Error
22038	Missing or Invalid <i>countryCode</i> for the FDID Record	<i>countryCode</i> must be present and populated for each Address Record present for each FDID Record within the file. <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u>	Error
22039	Missing or Invalid format of <i>postalCode</i> for the FDID Record	<i>postalCode</i> must be present and populated in the valid format for each Address Record present for each FDID Record within the file if the <i>countryCode</i> included has a corresponding Postal Code in Appendix E. <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u>	Error

Error Code	Error Code Description	Explanation	Warning/Error
22040	Missing <i>fdidCustomerList</i>	<i>fdidCustomerList</i> must be present for each FDID Record within the file, unless the FDID is being ended in the submission.	Error
22041	Missing or Invalid <i>customerRecordID</i> within <i>fdidCustomerList</i>	<i>customerRecordID</i> must be present and populated for each record within the <i>fdidCustomerList</i> object and reference a <i>customerRecordID</i> also present in either the <i>naturalPersonCustomerList</i> or <i>legalEntityCustomerList</i> . Affected record will not be processed for further validation checks.	Error
22042	Multiple active roles for <i>CAT</i> Customer within <i>fdidCustomerList</i>	Each <i>CAT</i> Customer, as reconciled to a single <i>tidValue</i> , present in the <i>fdidCustomerList</i> of a single FDID Record must have exactly one <i>role</i> without a set <i>roleEndDate</i> . It is not permissible for the same <i>CAT</i> Customer, as reconciled to a single <i>tidValue</i> , to have different active <i>role</i> values or the same active <i>role</i> value present in the <i>fdidCustomerList</i> . The dates on which a <i>CAT</i> Customer's <i>role</i> on an FDID Record are active cannot overlap by more than one calendar day with other <i>roles</i> for the same <i>CAT</i> Customer.	Error
22043	Missing or Invalid <i>role</i>	<i>role</i> must be present and populated with one of the allowable values for each record within the <i>fdidCustomerList</i> object.	Error
22044	Missing or Invalid <i>roleStartDate</i>	<i>roleStartDate</i> must be present and populated for each record within the <i>fdidCustomerList</i> object.	Error
22045	Missing or Invalid <i>roleEndDate</i>	When populated, <i>roleEndDate</i> must be in the correct format. Must be populated if <i>roleEndReason</i> is populated.	Error
22046	<i>roleEndDate</i> set prior to <i>roleStartDate</i>	When populated, <i>roleEndDate</i> must be equal to or later than <i>roleStartDate</i> .	Error
22047	Missing or Invalid <i>roleEndReason</i>	When populated, <i>roleEndReason</i> must be populated with one of the allowable values. Must be populated if <i>roleEndDate</i> is populated.	Error
22048	Associated Customer Record rejected	The FDID Record is rejected because an associated Customer Record was rejected.	Error
22049	Missing or Invalid <i>accountType</i>	<i>accountType</i> must be present and populated with one (or more, if applicable) of the allowable values for each FDID Record within the file.	Error
22050	Missing or Invalid <i>accountName</i>	<i>accountName</i> must be present and populated for each FDID Record within the file. Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.	Error
22052	Invalid <i>branchOfficeCRD</i>	When populated, <i>branchOfficeCRD</i> must be a valid value.	Error
22053	Reserved	Reserved for future use	
22054	Missing or Invalid <i>priorCATReporterCRD</i>	<i>priorCATReporterCRD</i> must be present and populated when <i>priorCATReporterFDID</i> is populated. When populated, <i>priorCATReporterCRD</i> must be a valid CAT Reporter CRD value.	Error

Error Code	Error Code Description	Explanation	Warning/Error
22055	Missing 'ADDRESS1' type Address Record on the FDID Record	An Address Record of type 'ADDRESS1' must be present for each FDID Record within the file. <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u>	Error
22056	Missing <i>addrLine1</i> on the FDID Record	Each Address Record for each FDID Record within the file must have a populated <i>addrLine1</i> . <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u>	Error
22057	Missing or invalid <i>addrType</i> on the FDID Record	<i>addrType</i> must be present and populated with one (or more, if applicable) of the allowable values for each Address Record present for each FDID Record within the file. <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u>	Error
22058	Missing or Invalid <i>priorCATReporterFDID</i>	<i>priorCATReporterFDID</i> must be present and populated when <i>priorCATReporterCRD</i> is populated. When populated, <i>priorCATReporterFDID</i> must be a valid <i>firmDesignatedID</i> value.	Error
22059	Improper Use of Address Type on the FDID Record	For an FDID Record: <i>addrType</i> value must not be duplicated on the FDID Record. 'ADDRESS2' must not be present and populated unless ADDRESS1 is also present and populated. 'ADDRESS3' must not be present and populated unless 'ADDRESS1' and 'ADDRESS2' are both present and populated. 'ADDRESS4' must not be present and populated unless 'ADDRESS1', 'ADDRESS2', and 'ADDRESS3' are present and populated. <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u>	Error
22060	Invalid format of Address Line on the FDID Record	When populated, an Address Line must be a valid value. This includes attributes <i>addrLine1</i> , <i>addrLine2</i> , <i>addrLine3</i> and/or <i>addrLine4</i> . <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u>	Error
22061	Missing or invalid <i>hasDiscretion</i>	Must be present and populated if <i>role</i> is set to 'AUTHREP' or 'AUTH3RD'. Must be omitted or 'false' if <i>role</i> is 'NTHOLDER' or 'TRDHOLDER'.	Error
22064	Invalid <i>clearingBrokerID</i>	When populated, <i>clearingBrokerID</i> must be properly	Error

Error Code	Error Code Description	Explanation	Warning/Error
		formatted.	
22065	Invalid <i>registeredRepCRD</i>	When populated, <i>registeredRepCRD</i> must be properly formatted.	Error
22066	Reserved	Reserved for future use	
22067	<i>roleEndDate</i> set later than <i>fdidEndDate</i>	The <i>roleEndDate</i> for all CAT Customers associated to a given FDID must not be set later than the <i>fdidEndDate</i> for that FDID.	Error
22068	No active CAT Customer associations	Each FDID must have at least one CAT Customer association with no <i>roleEndDate</i> set earlier than the <i>fdidEndDate</i> .	Error
22069	Improper combination of <i>accountType</i> and <i>fdidType</i> values	The <i>accountType</i> values of 'ENTITYID' and 'RELATIONSHIP' are only to be used when the <i>fdidType</i> is of the same value.	Error
22070	Reserved	Reserved for future use	
22071	No CAT Customer association with trading capabilities	Each FDID must have at least one active CAT Customer association with a <i>role</i> of 'TRDHOLDER', or a <i>role</i> of 'AUTHREP' or 'AUTH3RD' where <i>hasDiscretion</i> is 'true'.	Error
22072	Missing or invalid <i>authTraderNameID</i>	<i>authTraderNameID</i> must be present and populated for each record within the <i>authTraderNamesList</i> object of each FDID Record within the file. <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u>	Error
22073	Duplicated <i>authTraderNameID</i>	Each <i>authTraderNameID</i> must be present within the <i>authTraderNamesList</i> only once. Affected records will not be processed for further validation checks. <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u>	Error
22074	Missing or invalid <i>authTraderName</i>	<i>authTraderName</i> must be present and populated with a valid value for each record within the <i>authTraderNamesList</i> object of each FDID Record within the file. <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u>	Error
22075	Missing or Invalid <i>DVPCustodianID</i>	<i>DVPCustodianID</i> must be populated for every FDID Record where <i>accountType</i> includes the value 'DVP/RVP'.	Error
22076	Invalid use of <i>ItidEndReason</i>	When <i>ItidEndReason</i> is populated with a value of 'INACTIVE', the <i>fdidEndReason</i> of the associated FDID Record must also be populated with a value of 'INACTIVE'.	Error
22077	Invalid use of <i>roleEndReason</i>	When <i>roleEndReason</i> is populated with a value of 'INACTIVE', the <i>fdidEndReason</i> of the associated FDID Record must also be populated with a value of	Error

Error Code	Error Code Description	Explanation	Warning/Error
		'INACTIVE'.	
22078	Duplicate <i>role</i> for CAT Customer within the <i>fdidCustomerList</i>	This validation will be deployed to the Production Environment in Phase 1B: A CAT Customer present in the <i>fdidCustomerList</i> must not have duplicate <i>role</i> values.	Error
22501	Missing or Invalid <i>customerRecordID</i>	<i>customerRecordID</i> must be present and populated for each Customer Record within the <i>naturalPersonCustomerList</i> and <i>legalEntityCustomerList</i> . Affected record will not be processed for further validation checks.	Error
22502	Duplicated <i>customerRecordID</i>	Each <i>customerRecordID</i> must be present in the naturalPersonCustomerList or the legalEntityCustomerList CAIS Data File only once. Affected records will not be processed for further validation checks.	Error
22503	Invalid use of <i>updateNotification</i>	<i>updateNotification</i> must only be used for a Customer Record that has previously been accepted by the Reference DatabaseCAIS . Effective February 26, 2024, this validation was retired from the Production Environment- but Industry Members must repair pre-existing rejections for Error Code 22503. Effective with Phase 1A, Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.	Error
22504	Missing or Invalid format of <i>ein</i>	<i>ein</i> must be present and populated for each Legal Entity Customer Record within the file if the <i>tidType</i> is 'EIN'. Must be present in the appropriate format. Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.	Error
22507	Missing or Invalid <i>firstName</i>	<i>firstName</i> must be present and populated with a valid value for each Natural Person Customer Record within the file. Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.	Error
22508	Missing or Invalid <i>lastName</i>	<i>lastName</i> must be present and populated with a valid value for each Natural Person Customer Record within the file. Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.	Error
22509	Invalid <i>nameSuffix</i>	<i>nameSuffix</i> must be populated with one of the allowable values. Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.	Error

Error Code	Error Code Description	Explanation	Warning/Error
22510	Missing or Invalid format of <i>yearOfBirth</i>	<i>yearOfBirth</i> must be populated in the correct format for each Natural Person Customer Record within the file. <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u>	Error
22514	Missing 'ADDRESS1' type Address Record on the Customer Record	An Address Record type of 'ADDRESS1' must be present for each Customer Record within the file. <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u>	Error
22515	Missing <i>addrLine1</i> on the Customer Record	Each Address Record for each Customer Record within the file must have a populated <i>addrLine1</i> . <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u>	Error
22516	Missing or invalid <i>addrType</i> on the Customer Record	<i>addrType</i> must be present and populated with a valid value for each Address Record present for each Customer Record within the file. <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u>	Error
22517	Improper Use of Address Lines on the Customer Record	For a Customer Record: <i>addrLine2</i> must not be present and populated unless <i>addrLine1</i> is also present and populated. <i>addrLine3</i> must not be present and populated unless <i>addrLine2</i> and <i>addrLine1</i> are also present and populated. <i>addrLine4</i> must not be present and populated unless <i>addrLine3</i> , <i>addrLine2</i> and <i>addrLine1</i> are present and populated. <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u>	Error
22518	Missing or Invalid <i>city</i> on the Customer Record	<i>city</i> must be present and populated with a valid value for each Address Record present for each Customer Record within the file. <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u>	Error
22519	Missing or Invalid <i>regionCode</i> on the Customer Record	<i>regionCode</i> must be present and populated for each Address Record present for each Customer Record within the file if the <i>countryCode</i> included has a corresponding list of regions in Appendix E. <u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair</u>	Error

Error Code	Error Code Description	Explanation	Warning/Error
		outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.	
22520	Missing or Invalid <i>countryCode</i> on the Customer Record	<i>countryCode</i> must be present and populated for each Address Record present for each Customer Record within the file. Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.	Error
22521	Missing or Invalid format of <i>postalCode</i> on the Customer Record	<i>postalCode</i> must be present and populated in the valid format for each Address Record present for each Customer Record within the file if the <i>countryCode</i> included has a corresponding Postal Code in Appendix E. Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.	Error
22522	Data type violation – Customer Record	Customer Record contains one or more field values that violate the data type for the field.	Error
22523	Customer Record rejected because an associated FDID Record was rejected	The Customer Record is rejected because an FDID Record in the file with association to the Customer Record has been rejected, or because the Customer Record was not associated to an FDID Record in the submission file.	Error
22524	Missing or Invalid <i>customerType</i>	<i>customerType</i> must be present and populated with one (or more, if applicable) of the allowable values for each Customer Record within the file.	Error
22525	Customer Record has an open Material Inconsistency and <i>updateNotification</i> was not set as 'true'	The Customer Record has an open Material Inconsistency requiring resolution however the <i>updateNotification</i> field was either not included in the submission or was not set as 'true'. Effective February 26, 2024, this validation was retired from the Production Environment but Industry Members must repair pre-existing rejections for Error Code 22525. Effective with Phase 1A, Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.	Error
22526	<i>customerRecordID</i> not present in paired Transformed Identifiers File	Each <i>customerRecordID</i> present in the ReferenceCAIS Data File must have a corresponding entry in the paired Transformed Identifiers File. The <i>customerRecordID</i> in both the Transformed Identifiers File and the ReferenceCAIS Data File must be valid and properly formatted.	Error
22527	Improper Use of Address Type on the Customer Record	For a Customer Record: <i>addrType</i> value must not be duplicated on the Customer Record. 'ADDRESS2' must not be present and populated unless 'ADDRESS1' is also present and populated. 'ADDRESS3' must not be present and populated unless 'ADDRESS1' and 'ADDRESS2' are both	Error

Error Code	Error Code Description	Explanation	Warning/Error
		<p>present and populated.</p> <p>'ADDRESS4' must not be present and populated unless 'ADDRESS1', 'ADDRESS2', and 'ADDRESS3' are present and populated.</p> <p><u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u></p>	
22528	Invalid format of Address Line on the Customer Record	<p>When populated, an Address Line must be a valid value. This includes attribute <i>addrLine1</i>, <i>addrLine2</i>, <i>addrLine3</i> and/or <i>addrLine4</i>.</p> <p><u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u></p>	Error
22529	Customer Record rejected because another version of the <u>CAT</u> Customer was rejected	The Customer Record is rejected because another record for the same CAT Customer, as reconciled to a single <i>tidValue</i> , was rejected within the file.	Error
22530	Missing or Invalid <i>legalName</i>	<p><i>legalName</i> must be present and populated with a valid value for each Legal Entity Customer Record within the file.</p> <p><u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u></p>	Error
22531	Missing or Invalid <i>lei</i>	When populated, <i>lei</i> must be a valid value. Must be populated if the Input Identifier used to generate the Transformed Identifier of the <u>CAT</u> Customer was an LEI.	Error
22532	Invalid <i>doingBusinessAs</i> name	<p>When populated, <i>doingBusinessAs</i> must be properly formatted for each Natural Person Customer Record.</p> <p><u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u></p>	Error
22533	Multiple instances of <u>CAT</u> Customer with differing data	Multiple records for a single <u>CAT</u> Customer (as reconciled to a single <i>tidValue</i>) within the <u>CAIS Reference</u> Data File must have the same <i>sin</i> , <i>yearOfBirth</i> , and/or Customer Record Type (Natural Person or Legal Entity) values.	Error
22534	Natural Person CAT Customer reported with improper <i>foreignTIDType</i>	<p>Natural Person CAT Customer Records must not be reported with a <i>foreignTIDType</i> of 'LEI'.</p> <p>In order to repair this error code, the <u>CAT</u> Customer must be resubmitted in the <i>legalEntityCustomerList</i> with a <i>foreignTIDType</i> of 'LEI' and the same <i>tidValue</i>. This rejection is not repairable if the Industry Member erroneously reported the Natural Person <u>CAT</u> Customer with a <i>foreignTIDType</i> of 'LEI' when it should have reported the Natural Person <u>CAT</u> Customer with one of the <i>foreignTIDTypes</i> allowable for a foreign Natural Person <u>CAT</u> Customer. While repair credit will not be given, if the <u>CAT</u> Customer is</p>	Error

Error Code	Error Code Description	Explanation	Warning/Error
		<p>required to be reported to the Reference DatabaseCAIS, the Industry Member must resubmit the FDID Record (including all required LTID and CAT Customer associations) with corrected CAT Customer information.</p> <p>Otherwise, this rejection may be deleted with a <i>correctionAction</i> of 'DELETE'.</p>	
22535	Legal Entity CAT Customer reported with improper <i>foreignTIDType</i>	<p>Legal Entity CAT Customer Records must not be reported with a <i>foreignTIDType</i> of 'DRIVERLICENSE', 'PASSPORT' or 'PERMANENT'.</p> <p>In order to repair this error code, the CAT Customer must be resubmitted in the <i>naturalPersonCustomerList</i> with a <i>foreignTIDType</i> of 'DRIVERLICENSE', 'PASSPORT' or 'PERMANENT' (as applicable) and the same <i>tidValue</i>. This rejection is not repairable if the Industry Member erroneously reported the Legal Entity CAT Customer with a <i>foreignTIDType</i> of 'DRIVERLICENSE', 'PASSPORT' or 'PERMANENT' when it should have reported the Legal Entity CAT Customer with one of the <i>foreignTIDTypes</i> allowable for a foreign Legal Entity. While repair credit will not be given, if the CAT Customer is required to be reported to the Reference DatabaseCAIS, the Industry Member must resubmit the FDID Record (including all required LTID and CAT Customer associations) with corrected CAT Customer information.</p> <p>Otherwise, this rejection may be deleted with a <i>correctionAction</i> of 'DELETE'.</p>	Error
22536	Reserved	Reserved for future use	
22537	Reserved	Reserved for future use	
22538	Reserved	Reserved for future use	
22539	Reserved	Reserved for future use	
22540	Invalid <i>middleName</i>	<p>When populated, <i>middleName</i> must be properly formatted for each Natural Person CAT Customer Record.</p> <p>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</p>	Error
22541	Legal Entity CAT Customer reported with improper <i>tidType</i>	<p>Legal Entity CAT Customer Records must not be reported with a <i>tidType</i> of 'SSN/ITIN'.</p> <p>In order to repair this error code, the CAT Customer must be resubmitted in the <i>naturalPersonCustomerList</i> with a <i>tidType</i> of 'SSN/ITIN' and the same <i>tidValue</i>. This rejection is not repairable if the Industry Member erroneously reported the Legal Entity CAT Customer with a <i>tidType</i> of 'SSN/ITIN' when it should have reported the Legal Entity CAT Customer with a <i>tidType</i> of 'EIN'. While repair credit will not be given, if the CAT Customer is required to be reported to the Reference DatabaseCAIS, the Industry Member must resubmit</p>	Error

Error Code	Error Code Description	Explanation	Warning/Error
		<p>the FDID Record (including all required LTID and CAT Customer associations) with corrected CAT Customer information.</p> <p>Otherwise, this rejection may be deleted with a <i>correctionAction</i> of 'DELETE'.</p>	
22542	Natural Person CAT Customer reported with improper <i>tidType</i>	<p>Natural Person CAT Customer Records must not be reported with a <i>tidType</i> of 'EIN'.</p> <p>In order to repair this error code, the CAT Customer must be resubmitted in the <i>legalEntityCustomerList</i> with a <i>tidType</i> of 'EIN' and the same <i>tidValue</i>. This rejection is not repairable if the Industry Member erroneously reported the Natural Person CAT Customer with a <i>tidType</i> of 'EIN' when it should have reported the Natural Person CAT Customer with a <i>tidType</i> of 'SSN/ITIN'. While repair credit will not be given, if the CAT Customer is required to be reported to the Reference DatabaseCAIS, the Industry Member must resubmit the FDID Record (including all required LTID and CAT Customer associations) with corrected CAT Customer information.</p> <p>Otherwise, this rejection may be deleted with a <i>correctionAction</i> of 'DELETE'.</p>	Error
22543	Invalid combination of <i>ein</i> and <i>tidType</i>	<p>Please see the Full CAIS Industry Member Release Rollout for the Release Dates: When <i>ein</i> is populated, <i>tidType</i> must be 'EIN'.</p> <p>In order to repair this error code, the CAT Customer must be resubmitted with the same <i>tidType</i> and a null value in the <i>ein</i> field. This rejection is not repairable if the Industry Member erroneously reported the CAT Customer with a <i>tidType</i> other than 'EIN'. While repair credit will not be given, if the CAT Customer is required to be reported to the Reference DatabaseCAIS, the Industry Member must resubmit the FDID Record (including all required LTID and CAT Customer associations) with corrected CAT Customer information.</p> <p>Otherwise, this rejection may be deleted with a <i>correctionAction</i> of 'DELETE'.</p> <p>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</p>	Error
22544	Conflicting <i>ein</i> and <i>tidValue</i>	<p>Please see the Full CAIS Industry Member Release Rollout for the Release Dates:</p> <p>When <i>ein</i> is populated and <i>tidType</i> is 'EIN', the hashed version of the <i>ein</i> value must match the value populated in the <i>tidValue</i> field.</p> <p>In order to repair this error code, ensure that the value in the <i>ein</i> field is correct and correctly hashed per Section 3.4. This rejection is not repairable if the Industry Member reported an erroneous <i>tidValue</i>. While repair credit will not be given, if the CAT Customer is required to be reported to the Reference</p>	Error

Error Code	Error Code Description	Explanation	Warning/Error
		<p>DatabaseCAIS, the Industry Member must resubmit the FDID Record (including all required LTID and CAT Customer associations) with corrected CAT Customer information.</p> <p>Otherwise, this rejection may be deleted with a <i>correctionAction</i> of 'DELETE'.</p> <p><u>Effective with Phase 1A, this validation will be retired, and Industry Members will not be required to repair outstanding rejections for this error code. See CAT Alert 2026-01 for additional details.</u></p>	
22546	Unknown attribute on Customer Record	<p>Please see the Full CAIS Industry Member Release Rollout for the Release Dates:</p> <p>The Customer Record contains an attribute that is not known under the reported schema <i>version</i>.</p>	Error
22900	Malformed TID Record – CAT Customer Record not processed	The entry for this CAT Customer in the Transformed Identifiers File was malformed and could not be processed. See Section 6.5.2.1 Section 6.6.2.1 for details on repairing the record or deleting the rejection.	Error
22914	Paired TID Record failed validation– CAT Customer Record not processed	The paired entry for this CAT Customer in the Transformed Identifiers File failed validation and was not processed. See the associated Warning Code in the Transformed Identifiers Feedback File.	Error
23999	Unhandled Exception	An unknown error occurred during processing.	Error

B.3 Data Layer Validation Error Codes

The table below contains error messages that are associated when validating data contained in a submission record against data previously accepted into [the Reference Database CAT CAIS](#) for the same submission record. Error codes are associated with specific fields within a submission record.

Table 27: Data Layer Validation Errors

Error Code	Error Code Description	Explanation	Warning/Error
23004	<i>replacedByFDID</i> set to an unknown value	When populated, the <i>replacedByFDID</i> must reference a <i>firmDesignatedID</i> that is accepted without error in the current submission, or a <i>firmDesignatedID</i> that was previously accepted by the Reference DatabaseCAIS .	Error
23005	<i>fdidEndDate</i> set prior to <i>fdidDate</i> of replacing record	When <i>fdidEndReason</i> is set as 'REPLACED', the <i>fdidEndDate</i> must not be set prior to the <i>fdidDate</i> of the FDID set as the <i>replacedByFDID</i> .	Error

B.4 Warning Error Codes

The table below contains Warning messages that are associated with Data Validation and included in the feedback file. Warning codes are associated with specific fields within a submission record. Warnings are not required to be repaired.

Table 28: [ReferenceCAIS](#) Data File Validation Warnings

Error Code	Error Code Description	Explanation	Warning/Error
24001	Missing or Invalid <i>rejectionID</i>	When populated, the <i>rejectionID</i> must be a known <i>rejectionID</i> for the <i>catReporterCRD</i> whose data is included in the ReferenceCAIS Data File.	Warning
24002	Missing or Invalid <i>correctionAction</i>	When populated, <i>correctionAction</i> must be populated with one of the allowable values. Must be populated if <i>rejectionID</i> is populated.	Warning
24003	Missing or Invalid <i>correctingFirmDesignatedID</i>	When populated, <i>correctingFirmDesignatedID</i> must reference a <i>firmDesignatedID</i> that is included in the current ReferenceCAIS Data File or was accepted by the Reference DatabaseCAT-CAIS in a prior submission.	Warning
24005	Improper correction attempt	The <i>rejectionID</i> included in the <i>correctionList</i> is for an improper error code.	Warning
24006	Unknown Field Name	The <i>correctionList</i> contains a field that is not known under the reported schema <i>version</i> .	Warning
24007	Missing or Invalid <i>correctingCustomerRecordID</i>	When populated, <i>correctingCustomerRecordID</i> must reference a <i>customerRecordID</i> that is included in the current ReferenceCAIS Data File.	Warning
24008	Data type violation - <i>correctionList</i>	<i>correctionList</i> contains one or more field values that violate the data type for the field.	Warning
24009	<i>rejectionID</i> was Previously Repaired	An attempt was made to repair a <i>rejectionID</i> that has already been repaired.	Warning

Table 29: Transformed Identifiers File Validation Warnings

Error Code	Error Code Description	Explanation	Warning/Error	Corresponding Data Validation Error Code
24901	Malformed TID Record - Missing or invalid <i>customerRecordID</i>	<i>customerRecordID</i> must be present and populated for each TID Record within the file.	Warning	22526
24902	Malformed TID Record - Missing or invalid <i>tidType</i>	<i>tidType</i> must be present and populated for each TID Record within the file.	Warning	22900
24903	Malformed TID Record - Missing or invalid <i>foreignTIDType</i>	<i>foreignTIDType</i> must be present and populated for each record in the file where <i>tidType</i> is 'FOREIGN'. <i>foreignTIDType</i> must not be populated for any record in the file	Warning	22900

Error Code	Error Code Description	Explanation	Warning/Error	Corresponding Data Validation Error Code
		where <i>tidType</i> is not set as 'FOREIGN'.		
24904	Malformed TID Record - Missing or invalid <i>foreignTIDCountryCd</i>	<i>foreignTIDCountryCd</i> must be present and populated with a valid value for each record in the file where <i>tidType</i> is 'FOREIGN' and <i>foreignTIDType</i> is not 'LEI'. <i>foreignTIDCountryCd</i> must not be populated for any record in the file where <i>tidType</i> is not set as 'FOREIGN', or where <i>tidType</i> is set as 'FOREIGN' and <i>foreignTIDType</i> is set as 'LEI'. <i>foreignTIDCountryCd</i> must not be 'US' when <i>tidType</i> is 'FOREIGN'.	Warning	22900
24905	Malformed TID Record - Missing or invalid <i>tidValue</i>	<i>tidValue</i> must be present and populated for each record in the file and must be a 64-byte hexadecimal value.	Warning	22900
24906	Malformed TID Record - Invalid Input Identifier used to generate <i>tidValue</i> for <i>tidType</i> of SSN/ITIN	When <i>tidType</i> is 'SSN/ITIN', the original Input Identifier used to generate the <i>tidValue</i> must be properly formatted and adhere to the valid range of the SSN/ITIN identifier type.	Warning	22900
24907	Malformed TID Record - Invalid Input Identifier used to generate <i>tidValue</i> for <i>tidType</i> of EIN	When <i>tidType</i> is 'EIN', the original Input Identifier used to generate the <i>tidValue</i> must be properly formatted and adhere to the valid range of the EIN identifier type.	Warning	22900
24908	Missing or invalid <i>replacedByTIDType</i>	When populated, <i>replacedByTIDType</i> must be populated with a valid value. <i>replacedByTIDType</i> must be present and populated when <i>replacedByTID</i> is populated.	Warning	22914
24909	Missing or invalid <i>replacingForeignTIDType</i>	<i>replacingForeignTIDType</i> must be present and populated for each record in the file where <i>replacedByTIDType</i> is 'FOREIGN'. <i>replacingForeignTIDType</i> must not be populated for any record in the file where <i>replacedByTIDType</i> is not set as 'FOREIGN'.	Warning	22914
24910	Missing or invalid <i>replacingForeignTIDCountryCd</i>	<i>replacingForeignTIDCountryCd</i> must be present and populated with a valid value for each record in the file where <i>replacedByTIDType</i> is 'FOREIGN' and <i>replacingForeignTIDType</i> is not 'LEI'. <i>replacingForeignTIDCountryCd</i> must not be populated for any record in the file where <i>replacedByTIDType</i> is not set as 'FOREIGN', or where <i>tidType</i> is set as 'FOREIGN' and <i>replacingForeignTIDType</i> is set as 'LEI'. <i>replacingForeignTIDCountryCd</i> must not be 'US' when <i>tidType</i> is 'FOREIGN'.	Warning	22914
24911	Missing or invalid <i>replacedByTID</i>	When populated, <i>replacedByTID</i> must be a 64-byte hexadecimal value. Must be present when <i>replacedByTIDType</i> is populated.	Warning	22914

Error Code	Error Code Description	Explanation	Warning/Error	Corresponding Data Validation Error Code
		Each <i>replacedByTID</i> must have a corresponding valid entry in the Transformed Identifiers File.		
24912	Invalid Input Identifier used to generate <i>replacedByTID</i> for <i>replacedByTIDType</i> of SSN/ITIN	When <i>replacedByTIDType</i> is 'SSN/ITIN', the original Input Identifier used to generate the <i>replacedByTID</i> must be properly formatted and adhere to the valid range of the 'SSN/ITIN' identifier type.	Warning	22914
24913	Invalid Input Identifier used to generate <i>replacedByTID</i> for <i>replacedByTIDType</i> of EIN	When <i>replacedByTIDType</i> is 'EIN', the original Input Identifier used to generate the <i>replacedByTID</i> must be properly formatted and adhere to the valid range of the 'EIN' identifier type.	Warning	22914
24914	Malformed TID Record - <i>customerRecordID</i> not present in paired ReferenceCAIS Data File	Each <i>customerRecordID</i> present in the Transformed Identifiers File must have a corresponding valid entry in the paired ReferenceCAIS Data File.	Warning	22914
24915	Malformed TID Record - Duplicated <i>customerRecordID</i>	Each <i>customerRecordID</i> must be present in the Transformed Identifiers File only once. Affected records will not be processed for further validation checks.	Warning	22526 (if duplicated only in the Transformed Identifiers File) 22502 (if duplicated in both the ReferenceCAIS Data and Transformed Identifiers Files)
24916	Data type violation - TID	TID Record contains one or more field values that violate the data type for the field.	Warning	22526, 22900, or 22914
24917	Unknown Field Name	The Transformed Identifiers File contains a record level attribute that is not known under the reported schema version.	Warning	22914

B.5 Inconsistency Codes

The table below contains error messages that are associated with Material Inconsistencies and are included in the feedback file. Inconsistency Codes are associated with a specific Customer Record.

Table 30: ~~CAT CAIS~~ Inconsistency Codes

Inconsistency Code	Inconsistency Code Description	Explanation	Material/Minor
30002	Inconsistent data for <i>yearOfBirth</i> within the Industry Member	<u>Per CAT Alert 2025-02, no new 30002 Inconsistency Codes have been generated.</u> The Natural Person Customer Record has inconsistent data for the <i>yearOfBirth</i> . <u>Effective with Phase 1A, Industry Members are not required to resolve Material Inconsistencies. Effective with Phase 1B, Inconsistencies feedback will be disabled.</u>	Material
30003	Inconsistent data for <i>ein</i> within the Industry Member	Effective with the implementation of Error Code 22544, no new 30003 Inconsistency Codes <u>will have been</u> generated. <u>However, any previously generated 30003 Inconsistency Codes that remain outstanding must be resolved. Please see the Full CAIS Industry Member Release Rollout for the Release Dates:</u> The Legal Entity Customer Record has inconsistent data for the <i>ein</i> attribute. <u>Effective with Phase 1A, Industry Members are not required to resolve Material Inconsistencies. Effective with Phase 1B, Inconsistencies feedback will be disabled.</u>	Material
30004	Foreign TID reported as both Natural Person and Legal Entity within the Industry Member	The same Foreign TID has been reported as both a Natural Person and a Legal <u>Entity</u> . Each CAT Customer must be only one record type. <u>Effective with Phase 1A, Industry Members are not required to resolve Material Inconsistencies. Effective with Phase 1B, Inconsistencies feedback will be disabled.</u>	Material
40002	Inconsistent data for <i>yearOfBirth</i> across Industry Members, or within a single clearing firm across correspondents	<u>Per CAT Alert 2025-02, no new 40002 Inconsistency Codes have been generated.</u> The Natural Person Customer Record has inconsistent data for the <i>yearOfBirth</i> attribute. <u>Effective with Phase 1A, Industry Members are not required to resolve Material Inconsistencies. Effective with Phase 1B, Inconsistencies feedback will be disabled.</u>	Material
40003	Inconsistent data for <i>ein</i> across Industry Members, or within a single clearing firm across correspondents	Effective with the implementation of Error Code 22544, no new 40003 Inconsistency Codes <u>will have been</u> generated. <u>However, any previously generated 40003 Inconsistency Codes that remain outstanding must be resolved. Please see the Full CAIS Industry Member Release Rollout for the Release Dates:</u> The Legal Entity Customer Record has inconsistent data for the <i>ein</i> attribute. <u>Effective with Phase 1A, Industry Members are not required to resolve Material Inconsistencies. Effective with Phase 1B, Inconsistencies feedback will be disabled.</u>	Material
40004	Foreign TID reported as both Natural Person and Legal Entity across	The same Foreign TID has been reported as both a Natural Person and a Legal Entity. Each CAT Customer must be only one record type.	Material

Inconsistency Code	Inconsistency Code Description	Explanation	Material/Minor
	Industry Members, or within a single clearing firm across correspondents	<u>Effective with Phase 1A, Industry Members are not required to resolve Material Inconsistencies. Effective with Phase 1B, Inconsistencies feedback will be disabled.</u>	

Appendix C: Glossary

Term	Definition
Account	For the purpose of the Reference DatabaseCAIS Technical Specifications, the term Account is synonymous with Firm Designated ID (FDID). An Account may represent an account, Relationship ID, or Entity ID.
Account Opening Date	Account Opening Date is defined in the CAT NMS Plan. For Account reference data submissions, Account Opening Date is to be reported as <i>fdidDate</i> within the ReferenceCAIS Data File.
Authorized Trader	The CAT NMS Plan defines an Authorized Trader as “any person from whom the broker-dealer is authorized to accept trading instructions for such account, if different from the account holder(s)”.
CAT Customer	SEC Rule 613(j)(3) defines a CAT Customer as “(i) the account holder(s) of the account at a registered broker-dealer originating the order; and (ii) any person from whom the broker-dealer is authorized to accept trading instructions for such account, if different from the account holder(s)”.
CAT Reporter CRD	The Central Registration Depository identifier that an Industry Member uses to report CAT Account and Customer reference data.
CAT Submitter ID	The CAT-assigned identifier of the firm that submits data to CAT (for example, a CAT Reporting Agent).
CAT Trading Day	CAT Trading Day for Industry Members is defined as beginning immediately after 4:15:00 PM and no fractions of a second Eastern Time on one trade date and ending at exactly 4:15:00 PM and no fractions of a second Eastern Time on the next trading date. Weekends or any day that all equities or options national securities exchanges are closed are not considered a CAT Trading Day. Trading Days that close early end 15 minutes after the Market Close.
CCID	The Customer ID, also known as CAT Customer ID, is a unique identifier generated by the Plan Processor, that is defined within SEC Rule 613(j)(5) as “with respect to a customer, a code that uniquely and consistently identifies such customer for purposes of providing data to the central repository.” The CCID is a globally unique identifier generated for each unique TID value generated from a well-formatted and valid Input Identifier, in a way that is not reversible to the TID or textual Input Identifier value. The translation of TID to CCID is completed in the CCID Subsystem, in isolation from any of the Customer or Account reference data. The CCID value is never provided to Industry Members or CAT Reporting Agents and is only used within CAT to uniquely reference a single CAT Customer.
Discretion	If <i>hasDiscretion</i> is populated with 'true', this indicates the Authorized Trader has the ability to place orders on the Account without prior approval of the account holder(s). For Reference DatabaseCAIS reporting purposes, <i>hasDiscretion</i> value of 'true' does not indicate that an order was received with a “Not Held” instruction where the broker-dealer or trader only has discretion as to the price and time of execution.
FDID	FDID is defined in Section 1.1 of the CAT NMS Plan as “(1) a unique and persistent identifier for each trading account designated by Industry Members for purposes of providing data to the Central Repository provided, however, such identifier may not be the account number for such trading account if the trading account is not a proprietary account; (2) a unique and persistent relationship identifier when an Industry Member does not have an account number available to its order handling and/or execution system at the time of order receipt, provided, however, such identifier must be masked; or (3) a unique and persistent entity identifier when an employee of an Industry Member is exercising discretion over multiple client accounts and creates an aggregated order for which a trading

	<p>account number of the Industry Member is not available at 6 the time of order origination.”</p> <p>See FAQ M2 for more information on the prohibition on use of actual account numbers. Refer to the CAT Industry Presentation on FDID for additional information.</p>
Input Identifier	A generic term for the types of identifiers used to identify unique Customer Records, including SSN, ITIN, EIN, and FOREIGN. Input Identifiers are always translated to Transformed Identifier values prior to submission to CAT within the Transformed Identifiers File.
Legal Entity	For purposes of CAT reporting, a Legal Entity is a CAT Customer whose Input Identifier used to generate the <u>CAT</u> Customer’s TID is an EIN, or, for a Foreign Legal Entity, a National Registration or Tax Identifier, LEI or other Government-Issued Identifier issued by a non-national level government body or agency, such as a regional agency.
Natural Person	For purposes of CAT reporting, a Natural Person is a CAT Customer whose Input Identifier used to generate the <u>CAT</u> Customer’s TID is an SSN, ITIN; and for Foreign Natural Persons, a National Registration or Tax Identifier, Country of Domicile and Passport Number, Driver’s License, or Permanent Resident Identifier.
CAT NMS Plan-Defined PII	As defined in the CAT NMS Plan, means personally identifiable information, including a social security number or tax identifier number or similar information; Customer Identifying Information and Customer Account Information.
Sensitive Identifier	Input Identifiers, including Social Security Number, and Individual Taxpayer Identification Number, <u>EIN and certain Foreign Identifiers</u> which must not be submitted to the Reference DatabaseCAIS in plaintext and must be hashed into a Transformed Identifier using an SHA-256 hashing algorithm prior to submission to <u>Reference DatabaseCAIS</u> .
TID	The Transformed Identifier (TID) is a hashed version of the Input Identifier, submitted by the Industry Member to CAT in place of the Input Identifier, in accordance with the exemptive relief granted by the SEC on March 17, 2020 . The Industry Member has the responsibility to translate Input Identifiers to TID values prior to submission, in accordance with the mathematical logic provided in <u>Section 3.4 – Translation of Input Identifiers to TID Values</u> . Input Identifiers used to generate TID values must be input in valid format – that is, 999-99-9999 for SSN or ITIN, and 99-9999999 for EIN.
Trade Date	Trade Date for Industry Member is defined as beginning immediately after 23:59:59.999999 ET on Trade Date T - 1 and up to 23:59:59.999999 ET of the next Trade Date T. Weekends and holidays are not considered a Trade Date.

Appendix D: Data Dictionary

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
<i>accountName</i>	Extended Text (200)	FDID Record	<u>RO</u>	Exactly One per FDID Record	The name applied to the 'ACCOUNT', 'RELATIONSHIP', or 'ENTITYID' at the Industry Member. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>accountType</i>	Array [Choice]	FDID Record	R	Exactly One per FDID Record	Representation of the type or types of Account the FDID represents. All applicable values for the FDID must be included in the array. All values included in the array must be separated by commas. Values: AVERAGE – Industry Member-owned average price account. DVP/RVP – Delivery versus Payment account/Receipt versus Payment account. EDUCATION – Established for education savings including 529 Plan or Coverdale ESA. ENTITYID – Entity ID type record. Only allowable when the FDID represents the Entity ID of the firm when an employee of the firm is exercising discretion over multiple <u>CAT</u> Customer Accounts. ERROR – Error account. FIRM – Is owned by the reporting Industry Member firm, including proprietary trading accounts and inventory accounts. INSTITUTION – An	"AVERAGE" "DVP/RVP" "EDUCATION" "ENTITYID" "ERROR" "FIRM" "INSTITUTION" "MARKET" "MARGIN" "OPTION" "OTHER" "RELATIONSHIP" "RETIREMENT" "UGMA/UTMA"

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p>institutional account as defined in FINRA Rule 4512(c).</p> <p>MARKET – Market Making Account from which the Industry Member originates orders or to which it allocates shares/contracts in a security/securities for which the Industry Member is registered as a market maker, designated market maker, lead market maker or similar capacity on a national securities exchange or from which the Industry Member originates orders that clear in the OCC clearing range of 'M'. If the Industry Member reports New Order events with an <i>accountHolderType</i> of 'O', the <i>accountType</i> value of 'MARKET' must be included on the related FDID Record submitted to the Reference DatabaseCAIS. See FAQ C5 for more information.</p> <p>MARGIN – Approved for trading on margin.</p> <p>OPTION – Approved for trading options.</p> <p>OTHER – Account which does not meet the criteria for any other listed value.</p> <p>RELATIONSHIP – Relationship type record.</p> <p>RETIREMENT – As defined by the IRS:</p> <ul style="list-style-type: none"> • Individual Retirement Arrangements (IRAs) • Roth IRAs • 401(k) Plans • 403(b) Plans • SIMPLE IRA Plans (Savings Incentive Match Plans for Employees) • SEP Plans (Simplified Employee Pension) 	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<ul style="list-style-type: none"> • SARSEP Plans (Salary Reduction Simplified Employee Pension) • Payroll Deduction IRAs • Profit-Sharing Plans • Defined Benefit Plans • Money Purchase Plans • Employee Stock Ownership Plans (ESOPs) • Governmental Plans • 457 Plans UGMA/UTMA – Established as a custodial account under the Uniform Gift to Minors Act or Uniform Transfer to Minors Act.	
<i>addressList</i>	Multi-Dimensional Array	FDID Record	<u>RO</u>	Exactly One per FDID Record	Structure for the array of Address Records that are associated to the FDID Record within the file. At a minimum, an 'ADDRESS1' record populated with the mailing address associated to the FDID must be included for each FDID Record within the file. Additional addresses may be included for the FDID if available within the Industry Member's system. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>addressList</i>	Multi-Dimensional Array	Natural Person Customer Record	<u>CO</u>	Zero or One per Natural Person Customer Record	Structure for the array of Address Records that are associated to the Customer Record within the file. An 'ADDRESS1' record must be included for the Customer Record. Additional addresses may be included for the <u>CAT</u> Customer if available within the Industry Member's system.	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>addressList</i>	Multi-Dimensional Array	Legal Entity Customer Record	<u>EO</u>	Zero or One per Legal Entity Customer Record	Structure for the array of Address Records that are associated to the Customer Record within the file. An 'ADDRESS1' record must be included for the Customer Record. Additional addresses may be included for the Customer if available within the Industry Member's system. Additional addresses may be included for the CAT Customer if available within the Industry Member's system. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>addrLine1</i>	Extended Text (40)	Address Record	<u>RO</u>	Exactly One per Address Record	The first Address Line for the a <u>A</u> Address Record. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>addrLine2</i>	Extended Text (40)	Address Record	O	Zero or One per Address Record	Additional space for Address Line. Must not be provided if <i>addrLine1</i> is not provided. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be</u>	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<u>removed from the schema and will result in a rejection if submitted.</u>	
<i>addrLine3</i>	Extended Text (40)	Address Record	O	Zero or One per Address Record	Additional space for Address Line. Must not be provided if <i>addrLine2</i> is not provided. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>addrLine4</i>	Extended Text (40)	Address Record	O	Zero or One per Address Record	Additional space for Address Line. Must not be provided if <i>addrLine2</i> and <i>addrLine3</i> are not provided. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>addrType</i>	Choice	Address Record	RO	Exactly One per Address Record	The type of the Address Record. Values: ADDRESS1—The mailing Address Record of the FDID. ADDRESS2—The second Address Record of the FDID. ADDRESS3—The third Address Record of the FDID. ADDRESS4—The fourth Address Record of the FDID. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	<u>May optionally be populated with values including:</u> "ADDRESS1" "ADDRESS2" "ADDRESS3" "ADDRESS4"
<i>addrType</i>	Choice	Address Record	RO	Exactly One per Address Record	The type of the Address record. Values: ADDRESS1—The first Address Record of the	<u>May optionally be populated with values including:</u> "ADDRESS1"

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p>Customer.</p> <p>ADDRESS2—The second Address Record of the Customer.</p> <p>ADDRESS3—The third Address Record of the Customer.</p> <p>ADDRESS4—The fourth Address Record of the Customer.</p> <p><u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u></p>	<p>“ADDRESS2”</p> <p>“ADDRESS3”</p> <p>“ADDRESS4”</p>
<i>authTraderName</i>	Extended Text (200)	Authorized Trader Name List	<u>RO</u>	Exactly One per Authorized Trader Name Record	<p>The name of the Natural Person who has authority to place order for the account.</p> <p><u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u></p>	
<i>authTraderNameID</i>	Unsigned	Authorized Trader Name List	<u>RO</u>	Exactly One per Authorized Trader Name Record	<p>A unique reference to a single Authorized Trader Name for a single FDID, for a single submission file.</p> <p><u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u></p>	
<i>authTraderNamesList</i>	Multi-Dimensional Array	FDID Record	<u>EO</u>	Zero or One per FDID Customer Record	<p>Structure for the array of Authorized Trader Names that are associated to the FDID Record within the file.</p> <p>Must only be used for Natural Person Authorized Traders where the Industry Member does not have all data required to</p>	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p>report a full Natural Person Customer Record. Required when the FDID has one or more Authorized Traders for which the Industry Member does not have all data required to report a full Natural Person Customer Record. Not to be used if the Industry Member has all data required to report a full Customer Record for the Natural Person Authorized Trader. See Section 3.11 – Special Rules Regarding Natural Person Authorized Traders for more information.</p> <p>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</p>	
<i>branchOfficeCRD</i>	Unsigned	FDID Record	C	Zero or One per FDID Record	The CRD for the branch office to which the FDID Record is assigned, if applicable. Required if a Customer Account is assigned to a branch office other than the main office.	
<i>catReporterCRD</i>	Unsigned	Main	R	Exactly One per submission file	The CRD number assigned to the Industry Member to which the data within the file belongs.	
<i>catSubmitterID</i>	Unsigned	Main	R	Exactly One per submission file	The ID of the firm submitting the file to CAT. Required even when the Industry Member is submitting data for itself.	
<i>city</i>	Extended Text (100)	Address Record	QR	Exactly One per Address Record	<p>City of the address.</p> <p>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in</p>	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					a rejection if submitted.	
<i>clearingBrokerID</i>	Array [Alphanumeric (4)]	FDID Record	C	Zero or One per FDID Record	The NSCC Clearing ID of the Industry Member that clears the Accounts. Must be populated if known to the Industry Member. All values included in the array must be separated by commas. Each value must be exactly four characters, including leading zeros. If the Industry Member is a self-clearing firm, it must report its own NSCC Clearing ID.	
<i>correctingFirmDesignatedID</i>	Text (40)	Correction Action Record	C	Zero or One per Correction Record	The <i>firmDesignatedID</i> that is repairing a previously rejected <i>firmDesignatedID</i> . The <i>correctingFirmDesignatedID</i> value must reference a corresponding <i>firmDesignatedID</i> value that is either included in the current submission file or was accepted by the Reference Database CAT-CAIS in a prior submission. Required if the <i>correctionAction</i> is 'CORRECTION' and the prior error being corrected was against a <i>firmDesignatedID</i> .	
<i>correctingCustomerRecordID</i>	Unsigned	Correction Action Record	C	Zero or One per Correction Record	A reference to the <i>customerRecordID</i> value in the submission file that is repairing a previously rejected Customer Record. The <i>correctingCustomerRecordID</i> value must reference a <i>customerRecordID</i> that is included in the current submission file. Required if the <i>correctionAction</i> is 'CORRECTION' and the prior error being corrected was against a Customer Record.	
<i>correctionAction</i>	Choice	Correction Action Record	R	Exactly One per Correction Record	The action being taken to repair for the prior rejection. Values:	"CORRECTION" "DELETE"

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p>CORRECTION – The prior rejection is being repaired by including a <i>correctingFirmDesignate dID</i> or a <i>correctingCustomerRecordID</i>.</p> <p>DELETE – The prior rejection is being cleared without submitting a <i>correctingFirmDesignate dID</i> or a <i>correctingCustomerRecordID</i>.</p>	
<i>correctionList</i>	Multi-Dimensional Array	Main	C	Zero or One per Submission File	Structure for the array of Correction Action Records within the file. Required if the submission file contains one or more Correction Action Records.	
<i>correspondentCRD</i>	Unsigned	Main	C	Zero or One per submission file	The CRD number of the related introducing broker or correspondent firm whose customer and account data is kept on record at the Industry Member reporting to CAT. Required to be populated by clearing firms with introducing brokers or correspondents when reporting Accounts to the Reference DatabaseCAIS that are custodied for their introducing brokers/correspondents, including DVP/RVP accounts. All FDID and CAT Customer reference data reported in the file will be associated to the <i>catReporterCRD</i> and <i>correspondentCRD</i> pairing.	
<i>countryCode</i>	Choice	Address Record	RO	Exactly One per Address Record	Code of the country of the address, in ISO 3166-1 alpha-2 format. Please view Appendix E for acceptable values. Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be	May optionally be formatted as: AA

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<u>removed from the schema and will result in a rejection if submitted.</u>	
<i>customerRecordID</i>	Unsigned	FDID Customer Record	R	Exactly One per FDID Customer Record	A unique reference to a single <u>CAT</u> Customer for a single submission file. The value in this field must also be a value present in the <i>naturalPersonCustomerList</i> or the <i>legalEntityCustomerList</i> ; and present in the Transformed Identifiers File.	
<i>customerRecordID</i>	Unsigned	Legal Entity Customer Record	R	Exactly One per Legal Entity Customer Record	A unique reference to a single <u>CAT</u> Customer for a single submission file. The value in this field must also be a value present in the <i>fdidCustomerList</i> and present in the Transformed Identifiers File.	
<i>customerRecordID</i>	Unsigned	Natural Person Customer Record	R	Exactly One per Natural Person Customer Record	A unique reference to a single <u>CAT</u> Customer for a single submission file. The value in this field must also be a value present in the <i>fdidCustomerList</i> and present in the Transformed Identifiers File.	
<i>customerRecordID</i>	Unsigned	TID Record	R	Exactly One per TID Record	A unique reference to a single Customer Record in the <u>ReferenceCAIS</u> Data File. The value in this field must also be a value present in the <i>customerRecordIDs</i> in the <u>ReferenceCAIS</u> Data File.	
<i>customerType</i>	Array [Choice]	Natural Person Customer Record	R	Exactly One per Natural Person Customer Record	Representation of the characteristics of the CAT Customer. All applicable values for the CAT Customer must be included in the array. All values included in the array must be separated by commas. Values: ACCREDITED – <u>CAT</u> Customer was identified as an accredited	“ACCREDITED” “ADVISER” “CP” “EMPLOYEE” “FOREIGN” “NOTAPPLICABLE” “OTHBKR” “TRUST”

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p>investor by the Industry Member as set forth in Rule 501(a) of the Securities Act of 1933, if maintained in the Industry Member's general customer and account records.</p> <p>ADVISER – CAT Customer was identified as being associated with a U.S. registered Investment Adviser, if maintained in the Industry Member's general customer and account records.</p> <p>CP – CAT Customer identified itself as an officer, director, or 10% or more share owner of a public company at the time of account opening.</p> <p>EMPLOYEE – CAT Customer is an employee or associated person of the Industry Member, as defined in Section 3(a)(18) of the Securities Exchange Act of 1934. If employee attribute is maintained by the Industry Member at the group level, this value may also include CAT Customers employed by affiliated group companies.</p> <p>FOREIGN – CAT Customer is a Natural Person that does not have a U.S. Tax Identifier.</p> <p>NOTAPPLICABLE – None of the defined terms are applicable to the CAT Customer.</p> <p>OTHBKR – CAT Customer is associated with a U.S. registered broker-dealer other than the Industry Member.</p> <p>TRUST – CAT Customer is a trust.</p>	
<i>customerType</i>	Array [Choice]	Legal Entity Customer	R	Exactly One per Legal Entity Customer Record	Representation of the characteristics of the CAT Customer. All applicable values for the CAT Customer	<p>“ACCREDITED”</p> <p>“ADVISER”</p> <p>“BD”</p> <p>“FOREIGN”</p>

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p>must be included in the array. All values included in the array must be separated by commas.</p> <p>Values:</p> <p>ACCREDITED – <u>CAT</u> Customer was identified as an accredited investor by the Industry Member as set forth in Rule 501(a) of the Securities Act of 1933, if maintained in the Industry Member’s general customer and account records.</p> <p>ADVISER – <u>CAT</u> Customer was identified as a U.S. registered Investment Adviser, if maintained in the Industry Member’s general customer and account records.</p> <p>BD – <u>CAT</u> Customer is a U.S. registered broker-dealer, if maintained in the Industry Member’s general customer and account records. Effective July 11, 2023, ‘BD’ must be populated for all U.S. registered broker-dealer customer types, including for broker-dealer <u>CAT</u> Customers that were not identified as ‘BD’ prior to July 11, 2023.</p> <p>FOREIGN – <u>CAT</u> Customer is a Legal Entity that does not have a U.S. Tax Identifier.</p> <p>NOTAPPLICABLE – None of the defined terms are applicable to the <u>CAT</u> Customer.</p> <p>RIC – <u>CAT</u> Customer is a Registered Investment Company, as defined in the Investment Company Act of 1940 (15 U.S.C. § 80a–3(a)(1)), if maintained in the Industry Member’s general customer and account records.</p>	<p>“NOTAPPLICABLE”</p> <p>“RIC”</p> <p>“TRUST”</p>

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					TRUST – CAT Customer is a trust.	
<i>doingBusinessAs</i>	Extended Text (200)	Natural Person Customer Record	EQ	Zero or One per Natural Person Customer Record	The Doing Business As name for a sole proprietorship or other legal entity CAT Customer reported to the Reference DatabaseCAIS using SSN/ITIN as the Input Identifier, or for foreign CAT Customers, one of the Input Identifiers allowable for a foreign natural person. May Must be populated when reporting a CAT Customer as a Natural Person record that is a sole proprietorship, trust, or otherwise conducts business under a name other than the Natural Person's legal name. Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.	
<i>DVPCustodianID</i>	Array [Alphanumeric (5)]	FDID Record	C	Zero or One per FDID Record	Required when <i>accountType</i> includes 'DVP/RVP'. All values included in the array must be separated by commas. Each value must be five characters or fewer, including leading zeros. If the custodian is a U.S. broker-dealer, this field must be populated with the clearing number of the custodian. If the custodian is a bank and is not a registered broker-dealer, this field must be populated with the DTC number of the bank. See FAQ Q66 for acceptable uses of the value 'DTCRM'. If there is no clearing number or DTC number	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					because the custodian is foreign, this field must be populated with a value of 'FOR'.	
<i>ein</i>	Text (10)	Legal Entity Customer Record	<u>EO</u>	Zero or One per Legal Entity Customer Record	The Employer Identification Number (EIN) of the CAT Customer, in 99-9999999 format. May Must be included if the Input Identifier used to generate the Transformed Identifier of the CAT Customer was 'EIN'. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	99-9999999
<i>fdidCustomerList</i>	Multi-Dimensional Array	FDID Record	C	Exactly One per FDID Record	Structure for the array of Customer Records that are associated to the FDID Record within the file. Required when the FDID Record is being reported to <u>the Reference DatabaseCAIS</u> for the first time. Also required when there is no <i>fdidEndDate</i> . Not required when ending an FDID Record that was previously accepted with one or more CAT Customers.	
<i>fdidDate</i>	Date (Number) (8)	FDID Record	R	Exactly One per FDID Record	Date on which the FDID opened, as defined in <u>Section 2.2.3</u> of this specification, in YYYYMMDD format.	YYYYMMDD
<i>fdidEndDate</i>	Date (Number) (8)	FDID Record	C	Zero or One per FDID Record	Date on which the FDID was closed or ended, in YYYYMMDD format. Must be provided if the <i>fdidEndReason</i> field is populated.	YYYYMMDD
<i>fdidEndReason</i>	Choice	FDID Record	C	Zero or One per FDID Record	Reason why the FDID was closed or ended. Must be provided if the <i>fdidEndDate</i> field is populated. Values:	"CORRECTION" "ENDED" "INACTIVE" "REPLACED" "OTHER"

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p>CORRECTION – FDID was not required to be reported to the Reference DatabaseCAIS.</p> <p>ENDED – FDID was ended (e.g., account was closed).</p> <p>INACTIVE – Indicates the FDID has had no CAT-reportable transaction activity associated with the FDID in the prior six months.</p> <p>REPLACED – FDID replaced by another FDID within the Industry Member. See FAQ M16 regarding FDID replacements.</p> <p>OTHER – Other unlisted reason for ending the FDID.</p> <p>TRANSFER - FDID was transferred to another Industry Member as part of a mass transfer as described in Section 3.3.</p>	“TRANSFER”
<i>fdidRecordCount</i>	Unsigned	Main	R	Exactly One per submission file	The count of <i>firmDesignatedID</i> field occurrences within the file. Used to validate the count of FDID Records intended to be submitted within the file matches the count of records present in the file.	
<i>fdidRecordID</i>	Unsigned	FDID Record	R	Exactly One per FDID Record	A unique reference to a single FDID Record for a single submission file.	
<i>fdidRecordList</i>	Multi-Dimensional Array	Main	C	Zero or One per submission file	Structure for the array of FDID Records that are included in the file. Required if the submission file contains one or more FDID Records; not required if no FDID Records are included in the file.	
<i>fdidType</i>	Choice	FDID Record	R	Exactly One per FDID Record	Representation of the type of record of the reported FDID. Values: ACCOUNT – Account	“ACCOUNT” “RELATIONSHIP” “ENTITYID”

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					type record. RELATIONSHIP – Relationship type record. ENTITYID – Entity ID type record. Only allowable when the FDID represents the Entity ID of the firm when an employee of the firm is exercising discretion over multiple Customer Accounts.	
<i>firmDesignatedID</i>	Text (40)	FDID Record	R	Exactly One per FDID Record	The Firm Designated ID of the 'ACCOUNT', 'ENTITYID', or 'RELATIONSHIP' being reported by the Industry Member.	
<i>firstName</i>	Extended Text (40) Please see the Full CAIS Industry Member Release Rollout for the Release Dates: Extended Text (200)	Natural Person Customer Record	RO	Exactly One per Natural Person Customer Record	The First Name known for the CAT Customer. If the CAT Customer legally has one name, this field may optionally be populated with 'NNVE' (No Name Value Exists). Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.	
<i>foreignTIDCountryCd</i>	Choice	TID Record	C	Zero or One per TID Record	Code of the country that issued the Input Identifier used to generate the 'FOREIGN' <i>tidType</i> , in ISO 3166-1 alpha-2 format. Please view Appendix E for acceptable values. Required if the <i>tidType</i> is 'FOREIGN' and the <i>foreignTIDType</i> is not 'LEI'.	AA
<i>foreignTIDType</i>	Choice	TID Record	C	Zero or One per TID Record	The specific type of foreign Input Identifier used to generate a 'FOREIGN' <i>tidType</i> . Required to be populated if the <i>tidType</i> is 'FOREIGN'. The following hierarchy must be followed if more than one identifier type is	"DRIVERLICENSE" "LEI" "NATIONALID" "OTHGOVT" "PASSPORT" "PERMANENT"

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p>available for a foreign CAT Customer:</p> <p>Values:</p> <ol style="list-style-type: none"> 1. NATIONALID – National registration or tax identifier, if the Industry Member knows the identifier was issued by a national-level government body or agency, or when the Industry Member cannot distinguish if the issuer is a national-level government body or agency. 2. LEI – Legal Entity Identifier. 3. PASSPORT – Country of issuance and passport number. 4. PERMANENT – Permanent resident identifier. 5. DRIVERLICENSE – Driver’s license identifier. 6. OTHGOVT – Other government-issued identifier, if the Industry Member knows the identifier was issued by a non-national level government body or agency, such as a regional agency. Must not be used if one of the other allowable values apply. 	
<i>hasDiscretion</i>	Boolean	FDID Customer Record	C	Zero or One per FDID Customer Record	Indicates if the Authorized Trader has the ability to place orders on the Account without prior approval of the Holder(s). Must be present and populated if <i>role</i> is 'AUTH3RD' or 'AUTHREP'. Must be omitted or 'false' if <i>role</i> is 'NTHOLDER' or 'TRDHOLDER'.	True false
<i>largeTraderID</i>	Text (13)	Large Trader Record	R	Exactly One per Large Trader Record	The LTID or ULTID associated to the FDID in the Industry Member’s system. For LTID Records, the identifier must be eight numeric characters, followed by a dash,	For LTID – 99999999-9999 For ULTID – ULTXXXXX-XXXX

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					followed by four numeric characters. For ULTID Records, the identifier must start with 'ULT', followed by alphanumeric [0-9A-Z] characters for the fifth through eighth positions, followed by a dash, followed by four alphanumeric [0-9A-Z] characters.	
<i>largeTraderList</i>	Multi-Dimensional Array	FDID Record	C	Zero or One per FDID Record	Structure for the array of LTID and ULTID Records that are associated to the FDID Record within the file. Required if the submission file contains one or more LTID/ULTID Records associated to the FDID Record; not required if no LTID/ULTID Records are included in the file in association to the reported FDID Record.	
<i>largeTraderRecordID</i>	Unsigned	Large Trader Record	R	Exactly One per Large Trader Record	A unique reference to a single LTID or ULTID in reference to a single FDID Record for a single submission file.	
<i>lastName</i>	Extended Text (200)	Natural Person Customer Record	RO	Exactly One per Natural Person Customer Record	The Last Name known for the <u>CAT</u> Customer. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>legalEntityCustomerList</i>	Multi-Dimensional Array	Main	C	Zero or One per submission file	Structure for the array of Legal Entity type Customer Records that are included in the file. Required if the submission file contains one or more Legal Entity Customer Records; not required if no Legal Entity Customer Records are included in the file.	
<i>legalEntityCustomerRecordCount</i>	Unsigned	Main	R	Exactly One per submission	The count of <i>customerRecordID</i> field occurrences within the file for Legal Entity type	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
				file	<u>CAT</u> Customers. Used to validate the count of Legal Entity Customer Records intended to be submitted within the file matches the count of records present in the file.	
<i>legalName</i>	Extended Text (200)	Legal Entity Customer Record	R O	Exactly One per Legal Entity Customer Record	The Legal Name known for the <u>CAT</u> Customer. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	
<i>lei</i>	Alphanumeric (20)	Legal Entity Customer Record	C	Zero or One per Legal Entity Customer Record	The Legal Entity Identifier (LEI) of the <u>CAT</u> Customer. Must be provided if known to the Industry Member. Must be included if the Input Identifier used to generate the Transformed Identifier of the <u>CAT</u> Customer was an LEI.	
<i>ltidEffectiveDate</i>	Date (Number) (8)	Large Trader Record	R	Exactly One per Large Trader Record	Date on which the LTID or ULTID became associated to the FDID within the Industry Member's system, in YYYYMMDD format.	YYYYMMDD
<i>ltidEndDate</i>	Date (Number) (8)	Large Trader Record	C	Zero or One per Large Trader Record	Date on which the LTID or ULTID was no longer associated to the FDID within the Industry Member's system, in YYYYMMDD format. Must be provided if the <i>ltidEndReason</i> field is populated.	YYYYMMDD
<i>ltidEndReason</i>	Choice	Large Trader Record	C	Zero or One per Large Trader Record	Reason why the LTID or ULTID was no longer associated to the FDID. Must be populated in order to end date an LTID-to-FDID association in the system. Must be provided if the <i>ltidEndDate</i> field is populated. Values: CORRECTION – LTID	"CORRECTION" "ENDED" "INACTIVE" "REPLACED" "OTHER" "TRANSFER"

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p>was erroneously reported as associated to the FDID or FDID was not required to be reported to the Reference DatabaseCAIS.</p> <p>ENDED – LTID-to-FDID association was ended.</p> <p>INACTIVE – Indicates the associated FDID has had no CAT-reportable transaction activity in the prior six months.</p> <p>REPLACED – LTID was replaced by a different LTID or the FDID was replaced by a different FDID.</p> <p>OTHER – Other unlisted reason for ending the LTID-to-FDID association or per FAQ Q12, the reason why an LTID-to-FDID association was ended could not be reasonably ascertained.</p> <p>TRANSFER – LTID association was ended because the FDID was transferred to another Industry Member as part of a mass transfer as described in Section 3.3.</p>	
<i>middleName</i>	<p>Extended Text (20) Please see the Full CAIS Industry Member Release Rollout for the Release Dates:</p> <p>Extended Text (200)</p>	Natural Person Customer Record	O	Zero or One per Natural Person Customer Record	<p>The Middle Name or initial known for the CAT Customer.</p> <p>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</p>	
<i>nameSuffix</i>	Choice	Natural Person Customer Record	O	Zero or One per Natural Person Customer Record	<p>The Name Suffix known for the CAT Customer.</p> <p>Values: FIFTH FOURTH</p>	<p>May optionally be populated with values including: "FIFTH" "FOURTH"</p>

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p>JUNIOR</p> <p>SENIOR</p> <p>THIRD</p> <p><u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u></p>	<p>“JUNIOR”</p> <p>“SENIOR”</p> <p>“THIRD”</p>
<i>naturalPersonCustomerList</i>	Multi-Dimensional Array	Main	C	Zero or One per submission file	Structure for the array of Natural Person type Customer Records that are included in the file. Required if the submission file contains one or more Natural Person Customer Records. Not required if no Natural Person Customer Records are included in the file.	
<i>naturalPersonCustomerRecordCount</i>	Unsigned	Main	R	Exactly One per submission file	The count of <i>customerRecordID</i> field occurrences within the file for Natural Person type CAT Customers. Used to validate the count of Natural Person Customer Records intended to be submitted within the file matches the count of records present in the file.	
<i>postalCode</i>	Text (15)	Address Record	CO	Zero or One per Address Record	<p>Postal code of the address. Must be provided if postal codes exist for the country of the address. Please view Appendix E for acceptable formatting per country.</p> <p><u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u></p>	
<i>priorCATReporterCRD</i>	Unsigned	FDID Record	C	Zero or One per FDID Record	CRD of the Industry Member from which the Account was acquired as part of a mass	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					transfer as described in Section 3.3 . Must be provided if the Account was acquired by the Industry Member. Must be provided if <i>priorCATReporterFDID</i> is populated.	
<i>priorCATReporterFDID</i>	Text (40)	FDID Record	C	Zero or One per FDID Record	The original <i>firmDesignatedID</i> for the record acquired as part of a mass transfer as described in Section 3.3 . Must be provided by the acquiring Industry Member if the Account was acquired by the as part of a mass transfer.	
<i>regionCode</i>	Extended Text (40)	Address Record	<u>EQ</u>	Zero or One per Address Record	Code of the local region of the address. Required if the <i>countryCode</i> is 'US' or 'CA' and must be provided in ISO 3166-2 format. For all other <i>countryCodes</i>, the <i>regionCode</i> must be provided in text format if known to the Industry Member. <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	AA-XX* *Format when <i>countryCode</i> is 'US' or 'CA'
<i>registeredRepCRD</i>	Array [Unsigned]	FDID Record	O	Zero or One per FDID Record	The CRD number assigned to the Registered Representative(s) responsible for the FDID Record (as identified as such per SEC Rule 17a-3) that can provide trading advice for the Account. When optionally populated, all CRDs included in the array must be only numeric values, must not contain any leading zeroes, and must be separated by commas.	
<i>rejectionID</i>	Unsigned	Correction Action	R	Exactly One per Correction	The CAT-assigned <i>rejectionID</i> from a prior submission that was	

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
		Record		Record	created for the particular data validation error being corrected.	
<i>replacedByFDID</i>	Text (40)	FDID Record	C	Zero or One per FDID Record	The new <i>firmDesignatedID</i> replacing the currently reported <i>firmDesignatedID</i> . Used to provide historical linkage across replaced records over time. Must be provided if the <i>fdidEndReason</i> is 'REPLACED'. Must not be provided if the <i>fdidEndReason</i> is any value other than 'REPLACED'.	
<i>replacedByTID</i>	Hexadecimal (64)	TID Record	C	Zero or One per TID Record	The obfuscated Input Identifier of the CAT Customer when the CAT Customer's Input Identifier has changed. Must be provided if the <i>roleEndReason</i> is 'REPLACED'. Must not be provided when <i>roleEndReason</i> is a value other than 'REPLACED'.	
<i>replacedByTIDType</i>	Choice	TID Record	C	Zero or One per TID Record	The specific type of Input Identifier used to generate the <i>replacedByTID</i> when a CAT Customer's Input Identifier has changed. Required when <i>replacedByTID</i> is populated. Values: EIN – The <i>replacedByTID</i> was generated using an Employer Identification Number (EIN). FOREIGN – An identifier other than an EIN, SSN, or ITIN was used to generate the <i>replacedByTID</i> . SSN/ITIN – The <i>replacedByTID</i> was generated using a Social Security Number (SSN) or Individual Taxpayer Identification Number (ITIN).	"EIN" "FOREIGN" "SSN/ITIN"
<i>replacingForeignTIDCountryCd</i>	Choice	TID Record	C	Zero or One per TID	Code of the country that issued the Input Identifier used to	AA

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
				Record	generate the 'FOREIGN' <i>replacedByTIDType</i> when a foreign CAT Customer's Input Identifier has changed; in ISO 3166-1 alpha-2 format. Please view Appendix E for acceptable values. Required if the <i>replacedByTIDType</i> is 'FOREIGN' and the <i>replacingForeignTIDType</i> is not 'LEI'.	
<i>replacingForeignTIDType</i>	Choice	TID Record	C	Zero or One per TID Record	<p>The specific type of foreign Input Identifier used to generate a 'FOREIGN' <i>replacedByTIDType</i> when a foreign CAT Customer's Input Identifier has changed. Required to be populated if the <i>replacedByTIDType</i> is 'FOREIGN'. The following hierarchy must be followed if more than one identifier type is available for a foreign CAT Customer:</p> <p>Values:</p> <ol style="list-style-type: none"> 1. NATIONALID – National registration or tax identifier, if the Industry Member knows the identifier was issued by a national-level government body or agency, or when the Industry Member cannot distinguish if the issuer is a national-level government body or agency. 2. LEI – Legal Entity Identifier. 3. PASSPORT – Country of issuance and passport number. 4. PERMANENT – Permanent resident identifier. 5. DRIVERLICENSE – Driver's license identifier. 6. OTHGOVT – Other government-issued identifier, if the Industry 	"DRIVERLICENS E" "LEI" "NATIONALID" "OTHGOVT" "PASSPORT" "PERMANENT"

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					Member knows the identifier was issued by a non-national level government body or agency, such as a regional agency. Must not be used if one of the other allowable values apply.	
<i>role</i>	Choice	FDID Customer Record	R	Exactly One per FDID Customer Record	<p>Representation of the type of role the CAT Customer has on the FDID.</p> <p>Values:</p> <p>AUTH3RD – An Authorized Trader who is not a holder of the Account, nor an employee of the reporting Industry Member, who has authority to place orders for the Account without prior approval of the account holder(s).</p> <p>AUTHREP – An Authorized Trader who is not a holder of the Account but does have authority to place orders for the Account without prior approval of the account holder(s) and is either the reporting Industry Member or an employee of the reporting Industry Member, if the account holder specifically designates the natural person employee as authorized to trade for the Account independent of the authority granted to the entity Authorized Trader. See FAQ Q56 for more information.</p> <p>This <i>role</i> must also be used for affiliated group companies (for Legal Entity CAT Customers) and employees of affiliated group companies (for Natural Person CAT Customers) (see FAQ Q56 for more information), if the Industry Member maintains in its books and records that the</p>	<p>“AUTH3RD”</p> <p>“AUTHREP”</p> <p>“NTHOLDER”</p> <p>“TRDHOLDER”</p>

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p>Legal Entity CAT Customer or Natural Person CAT Customer is an affiliate. For example, if the Industry Member maintains in its books and records that the Legal Entity Registered Investment Advisor Authorized Trader is affiliated with the reporting Industry Member, the <i>role</i> must be 'AUTHREP'. If the Industry Member does not maintain in its books and records that the Legal Entity Registered Investment Advisor Authorized Trader is affiliated with the reporting Industry Member, the <i>role</i> may be 'AUTH3RD'.</p> <p>NTHOLDER – Holder of the Account that does not have authorization to trade on the Account.</p> <p>TRDHOLDER – Holder of the Account that also has authorization to trade on the Account.</p>	
<i>roleEndDate</i>	Date (Number) (8)	FDID Customer Record	C	Zero or One per FDID Customer Record	Date on which the CAT Customer ceased having the specified <i>role</i> on the FDID, in YYYYMMDD format. Must be provided if the <i>roleEndReason</i> field is populated.	YYYYMMDD
<i>roleEndReason</i>	Choice	FDID Customer Record	C	Zero or One per FDID Customer Record	<p>Reason why the CAT Customer ceased having the specified <i>role</i> on the FDID. Must be provided if the <i>roleEndDate</i> field is populated.</p> <p>Values:</p> <p>CORRECTION – CAT Customer was erroneously reported as associated to the FDID or FDID was not required to be reported to the Reference DatabaseCAIS.</p> <p>ENDED – CAT Customer was reported to the Reference</p>	<p>"CORRECTION"</p> <p>"ENDED"</p> <p>"INACTIVE"</p> <p>"REPLACED"</p> <p>"OTHER"</p> <p>"TRANSFER"</p>

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p><u>DatabaseCAIS</u> with an incorrect <i>role</i> (e.g., erroneously reported as 'AUTH3RD' rather than correctly reported as 'AUTHREP'), <i>role</i> on FDID was ended or FDID was ended (e.g., account was closed upon death of account holder).</p> <p>INACTIVE – Indicates the associated FDID has had no CAT-reportable transaction activity in the prior six months.</p> <p>REPLACED – <u>CAT</u> Customer <i>role</i> on FDID was ended because the FDID was replaced with another FDID, or because the <u>CAT</u> Customer Input Identifier was replaced with another Input Identifier.</p> <p>OTHER – Other unlisted reason for ending the <u>CAT</u> Customer <i>role</i> on FDID or per FAQ Q12, the reason why a Customer-to-FDID association was ended could not be reasonably ascertained.</p> <p>TRANSFER – Role ended because the FDID was transferred to another Industry Member as part of a mass transfer as described in Section 3.3.</p>	
<i>roleStartDate</i>	Date (Number) (8)	FDID Customer Record	R	Exactly One per FDID Customer Record	Date on which the <u>CAT</u> Customer entered into the specified <i>role</i> on the Account, in YYYYMMDD format.	YYYYMMDD
<i>tidType</i>	Choice	TID Record	R	Exactly One per TID Record	<p>The specific type of Input Identifier used to generate the <i>tidValue</i>.</p> <p>Values:</p> <p>EIN – The <i>tidValue</i> was generated using an Employer Identification Number (EIN).</p> <p>FOREIGN – An identifier other than an</p>	<p>"EIN"</p> <p>"FOREIGN"</p> <p>"SSN/ITIN"</p>

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					EIN, SSN, or ITIN was used to generate the <i>tidValue</i> . SSN/ITIN – The <i>tidValue</i> was generated using a Social Security Number (SSN) or Individual Taxpayer Identification Number (ITIN).	
<i>tidRecordCount</i>	Unsigned	Main	R	Exactly One per submission file	The count of TID Record occurrences within the file. Used to validate that the count of TID Records intended to be submitted within the file matches the count of records present in the file.	
<i>tidRecordList</i>	Multi-Dimensional Array	Main	C	Zero or One per submission file	Structure for the array of TID Records that are included in the file. Required if the submission file contains one or more TID Records; not required if no TID Records are included in the file.	
<i>tidValue</i>	Hexadecimal (64)	TID Record	R	Exactly One per TID Record	The obfuscated Input Identifier of the CAT Customer whose data is being reported.	
<i>updateNotification</i>	Boolean	Legal Entity Customer Record	QC	Zero or One per Legal Entity Customer Record	<u>May be optionally populated. Required as 'true' when the Customer Record is being reported to resolve a Material Inconsistency, or is being reported with known updates to material attributes.</u> <u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u>	true false
<i>updateNotification</i>	Boolean	Natural Person Customer Record	QC	Zero or One per Natural Person Customer Record	<u>May be optionally populated. Required as 'true' when the Customer Record is being reported to resolve a Material Inconsistency or is</u>	true false

Field Name	Data Type	JSON Object	Include Key	Occurrences	Description	Format/ Accepted Values
					<p>being reported with known updates to material fields.</p> <p><u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u></p>	
<i>version</i>	Text (10)	Main	R	Exactly One per submission file	<p>The <i>version</i> of the ReferenceCAIS Data File Schema under which the data is reported. <u>In Phase 1A, the <i>version</i> utilized for Reference Database full Customer and Account reporting is 2.0.0.</u></p> <p><u>Effective in Phase 1B, <i>version</i> must be set to '1.0.0' for Reference Data Files or else the file will be rejected.</u></p>	2.0.0
<i>version</i>	Text (10)	Main	R	Exactly One per submission file	<p>The <i>version</i> of the Transformed Identifiers File Schema under which the data is reported. <u>In Phase 1A, the <i>version</i> utilized for full Customer and Account Reference Database reporting is 2.0.0.</u></p> <p><u>Effective in Phase 1B, <i>version</i> must be set to '1.0.0' for Transformed Identifiers Files or else the file will be rejected.</u></p>	2.0.0
<i>yearOfBirth</i>	Year (Number) (4)	Natural Person Customer Record	RO	Exactly One per Natural Person Customer Record	<p>The Year of Birth known for the CAT Customer in YYYY format.</p> <p><u>Per the January 13, 2026 SEC approval order, this field may be optionally reported for a limited time. In Phase 1B, this field will be removed from the schema and will result in a rejection if submitted.</u></p>	YYYY

Appendix E: Country and Region Codes

Appendix E is located on www.catnmsplan.com/specifications/im. The appendix contains two lists, one list uses the Country Code, Country Name, and Postal Code formatting, while the other list uses the Region Code and Region Name. For countries present in Appendix E, the ISO 3166-2 formatted Region Code ~~may must~~ be used. For countries not present in Appendix E, the Region Code is not required to be in ISO 3166-2 format. If no Postal Code format is noted, Postal Code is optional for inclusion for the Country and no formatting validation will occur.⁶

⁶ ISO 3166-2 format validations for the *regionCode* and *postalCode* fields will NOT be applied to American Samoa, Guam, the Northern Mariana Islands, Puerto Rico, the U.S. Virgin Islands, or U.S. Minor Outlying Islands.