

Consolidated Audit Trail

**CAT Reporting Technical Specifications for Industry Members
Draft 2 Version 1.1 Key Changes**

Agenda

- ▶ Implementation Dates
- ▶ Technical Specifications- Key Changes
- ▶ Reporting Scenarios- Key Changes
- ▶ Registration Update
- ▶ Coming Events
- ▶ Q&A

Large Firm and Small OATS Reporting Firm* Implementation Dates

Phase	Final Technical Specifications Publication Date	Test Environment	Production Environment
2a	April 29, 2019	December 2019 with full implementation in September 2020	April 2020 with full implementation in October 2020*
2b	April 29, 2019	December 2019 with full implementation in September 2020	May 2020 with full implementation in December 2020
2c	January 2020	January 2021	April 2021
2d	June 2020	June 2021	December 2021
Customer and Account Information	January 2021	January 2022	July 2022

*Small OATS Reporting firms align with large firms only in phase 2a for the purposes of expediting OATS retirement.

Small Firm Implementation Dates

Small Firms defined as having total capitalization of less than \$500,000

Phase	Final Technical Specifications Publication Date	Test Environment	Production Environment
2a	April 29, 2019	December 2019 with full implementation in September 2020	December 2021
2b	April 29, 2019	December 2019 with full implementation in September 2020	December 2021
2c	January 2020	January 2021	December 2021
2d	June 2020	June 2021	December 2021
Customer and Account Information	January 2021	January 2022	July 2022

Updates for Error Correction and Feedback

- ▶ Sections 6 and 7
 - Updated File Name convention to support reporting of multiple event dates in a single file
 - Provided additional information related to Error Correction and Feedback
 - Included table of Feedback and Error Correction delivery timeframes
- ▶ Added new fields to each event to support corrections
 - *actionType, orderReceivedDate, CATReporterIMID, origFirmROEID, and origFileName*
- ▶ Added Appendix E:
 - File Acknowledgement
 - File Integrity Error codes
 - Order Events Ingestion Error codes

Linkage Keys

- ▶ Added Parent Order Key and TRF Linkage Key
- ▶ Updated instances where Parent Order Key would be applicable instead of Prior Order Key
- ▶ Updated field names referenced within linkage keys based on changes to event fields

Other Changes

- ▶ Clarifying changes made to Appendix D (Date Definitions)
- ▶ Removed MEOTQ event and added *quoteID* to MEOT as a conditional field (deferred to 2c)
- ▶ Clarified fields only required to be populated by ATSS

Scenarios Document Changes

- ▶ Created new sections dedicated to ATS reporting and to OTC equity securities and moved existing scenarios accordingly
- ▶ Added new scenarios related to ATS reporting and OTC equity securities
- ▶ Removed Scenario 2.2.5 “Trade as the Result of a Quote”
- ▶ Added Scenario 3.3.2 “Broker Receives Single-Leg Electronic Orders, Creates Combined Order and Routes to Exchange”

CAT Registration

- ▶ Initial CAT Registration will run from March 18, 2019 through June 27, 2019
- ▶ All current Industry Members with a CAT reporting obligation should register during this window
- ▶ Currently 165 reporting entities registered
- ▶ Registration Form can be found on www.catnmsplan.com/registration/index.html and is to be submitted online

Coming Events

- ▶ April 16, 2019- Industry Webinar on the Firm Designated Identifier (“FDID”)
- ▶ Mid-May 2019- Options Deep Dives in New York and Chicago

Questions?

- ▶ FINRA CAT Helpdesk- 1-888-696-3348
- ▶ help@finracat.com
- ▶ www.catnmsplan.com