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# Industry Test Release Status

April 7, 2020

# Agenda

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- Industry Test Release Update
- General Announcements & Reminders
- Upcoming Key Dates
- Q&A

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# Industry Test Release Update

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# Industry Member 2a/2b – Release 1 (File & Data Integrity) Release Rollout

## Live in Industry Test

11/18/2019

### Industry Test Release 1.1

- CAT Reporter Portal: ATS Order Types
- CAT Reporter Portal: CAT Reporting Relationships
- Multi-Factor Authentication Enabled
- Publication of IMID & Conflict List to [catnmsplan.com](http://catnmsplan.com)
- Publication of Issue/Option Symbol Reference Lists to [catnmsplan.com](http://catnmsplan.com)

12/16/2019

### Industry Test Release 1.2

- Industry Test Open for Machine-to-Machine File & Data Integrity Validations & Feedback
- CAT Reporter Portal: Basic File Statistics
- CAT Reporter Portal: Manual File Upload

2/24/2020

### Industry Test Release 1.3

- CAT Reporter Portal: File Submission feedback
- CAT Reporter Portal: Reporting Statistics (i.e. number of records received, accepted, rejected and feedback summaries)
- CAT Reporter Portal: Error Rates
- CAT Reporter Portal: Direct data entry & corrections
- CAT Reporter Portal: Bulk Repair of applicable Syntax/Semantic Errors

03/23/2020

### Industry Test Release 1.4

- Announcements
- System Status

4/13/20- Prod Environment  
Open

4/20/2020 – 2a Go-Live  
5/18/2020 – 2b Go-Live

- 2a Go-Live – Industry Member 2a Reporting Required on April 20
- 2b Go-Live – Industry Member 2b Reporting Required on May 18

# Industry Test Status – As of April 3, 2020 Statistics

Item	Statistic – Last Week	Statistic – This Week	Increase/Decrease
Number of Firms Certified	171	264	Increased by 93
Number of Firms operating under CAT Reporter Agreements	1,345	1,354	Increased by 9
Number of Reporting Relationships Entered	1,747 relationships from 973 firms	1,827 relationships from 1007 firms	Increased by 80 across 34 firms
Number of ATS Order Types Entered	606 order types from 22 ATS firms	609 order types from 23 ATS firms	Increased by 3 order types across 1 ATS firm
Number of Total Submitters	155	162	Increased by 7 submitters
Number of IMIDs	1,089 from 723 firms	1,184 from 805 firms	Increased by 95 across 82 firms
Number of Files Received	1,635,353 <ul style="list-style-type: none"> <li>Reporter Portal: 19,065</li> <li>Private Line: 1,616,288</li> </ul>	1,830,053 <ul style="list-style-type: none"> <li>Reporter Portal: 21,729</li> <li>Private Line: 1,808,324</li> </ul>	Increased by 194,700 <ul style="list-style-type: none"> <li>Reporter Portal: 2,664</li> <li>Private Line: 192,036</li> </ul>
Number of Files Rejected	375,961	382,233	Increased by 6,272
File Reject Rate	22.76%	20.88%	Decreased by 1.88%

# Industry Test Status – March 30– April 3, 2020 Statistics

CAT Processing date	Product Type								
	Equities			Options			DEL/Unparsed records		
	Processed	Rejected	Rejection Rate	Processed	Rejected	Rejection Rate	Processed	Rejected	Rejection Rate
3/30/2020	3,884,133,454	29,155,739	0.75%	530,875,098	75,080,775	14.14%	913	900	98.58%
3/31/2020	7,059,862,898	7,473,344	0.11%	429,617,493	38,674,032	9.00%	2,004	1,969	98.25%
4/1/2020	5,750,975,171	85,870,897	1.49%	422,436,293	42,751,449	10.12%	655,631	655,625	100.00%
4/2/2020	7,626,052,966	12,718,885	0.17%	423,376,631	38,415,542	9.07%	26,760	26,754	99.98%
4/3/2020	6,991,983,900	17,421,227	0.25%	380,688,405	1,707,089	0.45%	4,596,204	4,596,199	100.00%
<b>Total</b>	<b>31,313,008,389</b>	<b>152,640,092</b>	<b>0.49%</b>	<b>2,186,993,920</b>	<b>196,628,887</b>	<b>8.99%</b>	<b>5,281,512</b>	<b>5,281,447</b>	<b>99.99%</b>

# FINRA CAT Open Issues List – Release Planned/Workaround Provided

#	Status	Error Code	Summary	Resolution	Priority	Targeted Release Date/Workaround	Area
1	Open	N/A	Reporter Portal is not accurately reflecting Repair Count and Adjusted Error Rate when corrections submitted for a single day per firm exceed 100,000. Additionally, Error Counts on Error Summary screen do not reflect errors in excess of 100,000.	Code Release	Medium	Workaround: FINRA CAT Helpdesk will support Long term fix: Release planning in progress	Statistics
2	Open	2019	NYSE floor broker booth numbers are not included in reference data causing Route event rejections.	Reference Data Update	Medium	Workaround: Manual updates to Reference Data by 4/13/20 Long term fix: Release planning in progress	Reference Data
3	Open	2153	Isolated instances of data file not readable error for well-formed JSON and CSV data files.	Code Release	Low	4/13/2020	Validations
4	NEW – Open	N/A	Few firms are experiencing isolated timeout issues errors when accessing the Error Summary Screen in the Portal.	Code Release	Low	4/20/2020	Reporter Portal

# FINRA CAT Open Issues List – Low Priority Items Planned as Enhancements post 4/13/2020

#	Status	Error Code	Summary	Resolution	Priority	Targeted Release Date	Area
1	Open	Multiple	FINRA CAT is accepting the following scenario instead of rejecting – Future dates in some fields.	Code Release	Low	To be scheduled	Validations
2	Open	2133	For Name/Value Pair Data type fields, providing a value that is not in allowable values list returns error code 2133 (Additional Field) instead of error code 2101 (Missing or Invalid timeInForce).	Code Release	Low	To be scheduled	Validations
3	Open	2122	Incorrect error code is generated when an array field (e.g., clientDetails) is provided as a Name/Value pair.	Code Release	Low	To be scheduled	Validations
4	Open	N/A	Isolated issue with Timeout Warnings at Integrity phase resulting in missing File Integrity feedback.	Under Review	Low	To be determined	Feedback
5	Open	1121	Few firms are incorrectly receiving file integrity errors due to pairing issues between the meta and data files.	Under Review	Low	To be determined	Validations

# FINRA CAT Recently Closed Issues List– As of 4/7/20

#	Status	Error Code	Summary	Resolution	Priority	Targeted Release Date	Area
1	Closed	N/A	Reporter portal is not always displaying all the processed files in the File status screen.	Code Release	Low	4/1/2020	Reporter Portal

# FINRA CAT Observations

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FINRA CAT intends to enforce the following in Phase 2a/2b:

- Reject *senderIMID = receiverIMID* on Order Accept, Order Modified and Quote Received
- Reject *senderIMID = destination* on Order Route and New Quote
- Reject *destinationType = F* and *destination* null on Order Route
- Reject *orderId = priorOrderID* or *parentOrderID* on certain events such as MEOM and MEIR/MECO

# Planned Industry Member Technical Specification Updates– Last Updated 4/2/2020

#	Status	Error Code	Summary	Resolution	Release Date	Area
1	Open	N/A	Update data type timestamp to clarify UTC time: Timestamps submitted in Coordinated Universal Time (UTC) must not be adjusted for Eastern Time. Timestamps submitted in STRING format must be in Eastern Time.	Documentation Update	To be scheduled	IM Technical Specification
2	Open	N/A	In instances where the market maker sends a market maker order through an options exchange protocol that does not require an exchange origin code, Industry Members must populate the exchOriginCode with a value of 'MM'.	Documentation Update	To be scheduled	IM Technical Specification
3	Open	N/A	v2.2.1 r3 was updated to note that the marketCenterID and REC fields are mutually exclusive. This language was updated in the marketCenterID field description but was not updated in REC field description.	Documentation Update	To be scheduled	IM Technical Specification
4	Open	N/A	Add values for LTSE: <ul style="list-style-type: none"> <li>marketCenterID: LT</li> </ul>	Documentation Update	To be scheduled	IM Technical Specification
5	Open	N/A	Add values for MIAMI Pearl Equities: <ul style="list-style-type: none"> <li>destination: PEARLEQ</li> <li>senderIMID: PEARLEQ</li> <li>marketCenterID: H</li> </ul>	Documentation Update	To be scheduled	IM Technical Specification
6	Open	N/A	Clarification for the population of Parent Key and Prior Key identifiers will be added to specify when a new Order Key, Trade Key or Fulfillment Key is not assigned, the Parent Key identifier or Prior Key identifier must remain blank; related Error Codes will be added.	Documentation Update	To be scheduled	IM Technical Specification
7	NEW- Open	N/A	Update Data Types section to remove the requirement that Boolean must be lower case.	Documentation Update	To be scheduled	IM Technical Specification
8	NEW- Open	N/A	Update section 2.4.1 with additional clarification and examples outlined in CAT Alert 2018-003. Specifically, other IMIDs in an event (e.g. senderIMID, receiverIMID) do not need to equal the CAT Reporter IMID.	Documentation Update	To be scheduled	IM Technical Specification

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# General Announcements & Reminders

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# FINRA CAT Announcements

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- No further updates on the SEC No Action Letter.
- Rather than the previously scheduled Daily Industry Checkpoint Calls, Consolidated Audit Trail, LLC and FINRA CAT, LLC will maintain our Weekly Industry Checkpoint Calls on Tuesdays at 4:15 pm ET until further notice.
- Ping testing is available for SRG, PrivateLines and AWS PrivateLink in the Production Environment. AWS PrivateLink production endpoints were emailed to subscribers on April 6, 2020.
- The upload\_arcv FTP directory will no longer be available to users.
- The following will be available in the Production Environment (on April 13, 2020) prior to Test Environment (on April 20, 2020): export on error search, Market Center ID of “LT”, and Group Repair expanded from 500 to 10,000 records.
- The Group Repair eligibility logic is being enhanced. As a result, records eligible for Group Repair will not be marked with ‘Y’ for dates prior to April 20, 2020 in the Test Environment (Production Environment is not affected by this enhancement).

# FINRA CAT Observations

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## File Submission – FINRA CAT Recommended Practice

- File Submissions should be one file per IMID within specified file maximums:
  - CAT Reporter Portal: 1GB uncompressed/100,000 records
  - Machine-to-Machine: 100GB uncompressed
- Benefit to Submitters:
  - Fewer files for submitter to manage
  - Expedited feedback response

Note: SFTP (Machine-to-Machine) is **not** limited by 1GB/100,000 record limits on the Reporter Portal. Files may be up to **100GB** uncompressed which can contain significantly more than 100,000 records. As stated above, feedback times will be faster with fewer files.

# FINRA CAT Reminders

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- Duo MFA had not planned to support devices running end-of-life operating systems after April 13, 2020; this has been deferred to a later date.
- To ensure all securities reportable during any given transaction date are identified for reporting, firms are encouraged to use both the SOD and EOD files.
- All Test Symbols (equity and options) will be rejected in the Production Environment.

# Onboarding – Certification of Production Readiness Testing

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- Once CAT Reporters have completed **all** onboarding steps, including the successful completion of the Production Readiness Testing, each IM and CRA must contact the FINRA CAT Helpdesk (888-696-3348 or [help@finracat.com](mailto:help@finracat.com)).
- The FINRA CAT Helpdesk will require the Processing Date(s) on which the testing occurred.
- Upon verification of the Production Readiness Testing and all other Onboarding Steps by FINRA CAT, CAT Reporters will be granted access to the CAT Production Environment, and a notification confirming access will be sent.

FINRA CAT Onboarding Guide is posted at <https://catnmsplan.com/registration/>

# Onboarding – Certification of Production Readiness Testing Updates

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- Reporting Relationships for IMs certified for Production by close of business on April 3, 2020 will be active in the Production Environment on April 13, 2020.
  - Any relationships that IMs do not want to be automatically ported to the Production Environment should be expired by the Industry Member in the Test Environment with an Expiration Date prior to April 12, 2020.
  - Any relationships with an Expiration Date on or prior to April 12, 2020 will **not** be ported to the Production Environment.
  - Between April 13, 2020 and April 17, 2020, IMs that have been certified for Production must verify that all Reporting Relationships are correctly established in the Production Environment. If the IM does not want a Reporting Relationship that was automatically ported to Production, it must expire the relationship in the Production Environment.
- IMs certified for Production after April 3, 2020 must manually enter all Reporting Relationships into the Production Environment.
- FINRA CAT is analyzing the possibility of porting additional Reporting Relationships prior to May 5, 2020.
- ATS Order Types entered into the Test Environment prior to April 12, 2020 will automatically be ported to the Production Environment on April 13, 2020.
  - The automatic porting of ATS Order Types will only occur once.

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# Upcoming Key Dates

# Upcoming Key Dates for Release 2a/2b

Topic	Event	Date
Industry Call: Industry Testing Checkpoint	Weekly Industry Testing Checkpoint Calls – Every Tuesday at 4:15 pm (ET)	January 7, 2020 until further notice
Connectivity	Ping Testing available for AWS PrivateLink (set up available after this date)	April 6, 2020
Industry Test Certification	Industry Members and CAT Reporting Agents must complete production readiness testing for 2a reporting	April 6, 2020*
Production Readiness	Production Environment Opens for Production Readiness	April 13, 2020
Production Go-Live	Production Go-Live for Equities 2a file submission and data integrity validations	April 20, 2020
Industry Call: Production Release Checkpoint	Regularly Scheduled Weekly Industry Testing Checkpoint Calls and Status of 2a Go-Live	April 21, 2020

\* As noted in the Participant’s Statement on the SEC’s No Action Letter, this date is now May 6, 2020.

The timeline of Phase 2a/2b Release 1 (File Validation & Data Integrity) can be found at <https://catnmsplan.com/timeline>

# Upcoming Key Dates for Release 2a/2b

Topic	Event	Date
Industry Test Certification	Industry Members and CAT Reporting Agents must complete production readiness testing for 2b reporting	May 4, 2020
Industry Call: Industry Testing Checkpoint	Daily Industry Testing Checkpoint Calls at 4:15 pm (ET)	May 4, 2020 – May 15, 2020
Production Go-Live	Production Go-Live for Options 2b file submission and data integrity validations	May 18, 2020
Industry Call: Production Release Checkpoint	Industry Call - Status of 2b Go-Live	May 19, 2020
Industry Webinar and Demo	Industry Webinar and Demo of Compliance Report Card	June 2, 2020
Production Go-Live	Release of Industry Member Compliance Report Card for Equities ONLY	June 19, 2020
Production Go-Live	Release of Industry Member Compliance Report Card including Equities and Options	July 20, 2020

# How to Ask a Question during Today's Call

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

# FINRA CAT Helpdesk

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