

Consolidated Audit Trail

Customer and Account Information System (CAIS)

Full CAIS Technical Specification Updates – R5

10/19/21

Key Updates

- Addition of Extended Text data type
- Addition of reporting guidance on:
 - *correspondentCRD*
 - Foreign Input Identifiers
 - Material Inconsistency obligations
 - Replacements and mass transfers of FDIDs
 - 'RELATIONSHIP' and 'ENTITYID' FDID *roles*
 - *customerType* values 'EMPLOYEE', 'BD', 'RIC'
 - *registeredRepCRD* and *branchOfficeCRD* for clearing firms and institutional customers
 - Updated *registeredRepCRD* to be Optional
 - Added a new Error code 22071 denoting that each FDID record must have at least one CAT Customer with trading capabilities

Extended Text Data Type

- The permitted range of ASCII values will be increased from the current range of **32-126** to allow all printable characters from **32-255**. This allows support of accents, umlauts, tildes, and similar characters which may be included in the customer name, addresses, or account names.
- Characters which are restricted from use in fields of the Text data type – including commas, pipes, double quotes, and @s – **will** be acceptable in fields with the Extended Text data type.
- The extended range applies to the following **FDID** fields:
 - Account Name
 - Address Lines 1-4
 - City
 - Region Code (when Country is not US or CA)
- The extended range applies to the following **Customer** fields:
 - First, Middle, Last, Legal, and Doing Business As Names
 - Address Lines 1-4
 - City
 - Region Code (when Country is not US or CA)

Updates to Reporting Guidance

➤ **Foreign Input Identifiers**

- The following hierarchy must be followed if more than one identifier type is available for a foreign CAT Customer:
 - National Registration or Tax Identifier (Natural Person or Legal Entity)
 - LEI (Legal Entity)
 - Country of Domicile and Passport Number (Natural Person)
 - Permanent Resident Identifier (Natural Person)

➤ **Material Inconsistencies**

- Addition of Section 2.2.13 – Material Inconsistency Obligations for Triggering Firms
- Addition of Section 2.2.14 – Material Inconsistency Obligations for Impacted Firms

Updates to Reporting Guidance Cont'd

- ***role for 'RELATIONSHIP' and 'ENTITYID' FDIDs***
 - For 'RELATIONSHIP' and 'ENTITYID' FDIDs, *role(s)* of associated customer(s) should be 'TRDHOLDER'
- ***customerType***
 - 'EMPLOYEE' can only be used for Natural Person CAT Customers
 - 'RIC' and/or 'BD' can only be used for Legal Entity CAT Customers
- ***registeredRepCRD & branchOfficeCRD***
 - registeredRepCRD is now an Optional field – when reported, it must be the CRD value of the representative
 - Neither field is required for clearing firms reporting data of correspondents

Minor Updates

➤ **Minor Updates**

- Clarified FDID definition in Section 2.2.1
- Updated definition of *doingBusinessAs* and *branchOfficeCRD*
- Updated definition of 'AVERAGE' *accountType* value
- Corrected *doingBusinessAs* to be Conditional rather than Optional
- Updated *fdidCustomerList* to be Conditional (not required when ending FDID)
- Added Account, Natural Person, and Legal Entity definitions to Appendix C (Glossary)
- Modifications to JSON examples and Appendix B error codes

Field Definition Updates

- **accountType of 'AVERAGE'**
 - **R4:** Average price account
 - **R5:** Firm-owned average price account

- **doingBusinessAs**
 - **R4:** The Doing Business As name for a sole proprietorship or other legal entity customer reported to CAIS using an SSN/ITIN as the Input Identifier.
 - **R5:** The Doing Business As name for a sole proprietorship or other legal entity customer reported to CAIS using an SSN/ITIN as the Input Identifier. **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 its legal name.**

- **branchOfficeCRD**
 - **R4:** The Central Registration Depository system generated CRD Branch Number assigned when the CAT Reporter firm filed Form BR. Must be provided if known to the CAT Reporter firm.
 - **R5:** 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.**

Glossary Additions

➤ **Account**

- For the purpose of the CAIS Technical Specification, the term Account is synonymous with Firm Designated ID (FDID). An Account may represent an account, Relationship ID, or Entity ID.

➤ **Natural Person**

- For purposes of CAT reporting, a Natural Person is a CAT Customer whose Input Identifier used to generate the Customer's TID is an SSN, ITIN, National Registration or Tax Identifier, Country of Domicile and Passport Number, or Permanent Resident Identifier.

➤ **Legal Entity**

- For purposes of CAT reporting, a Legal Entity is a CAT Customer whose Input Identifier used to generate the Customer's TID is an LEI or EIN.

FINRA CAT Helpdesk

Questions may be directed to the FINRA CAT Helpdesk at 888-696-3348 or help@finracat.com

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