



Update on CAT Order File/Reporting Services and Test File Availability

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Overview

As previously announced in Exchange Notice [C2020011500](#), we intend to make consolidated audit trail ("CAT") formatted files available to our Cboe Options, C2 Options, BYX, BZX, EDGA, EDGX Members and Trading Permit Holders (collectively "Members") for orders processed via the PULSe, Silexx, PAR, Clearing Editor, and Trade Entry applications/platforms where applicable. In order for us to perform this work Members will need to execute a CAT Data Services Agreement with Cboe-affiliated entity, Cboe Silexx, LLC ("Cboe Silexx").

By signing the Agreement, an interested Member authorizes and directs Cboe Silexx to compile CAT order information from the relevant applications/platforms and provide the resulting files to the Member through the Cboe Member Portal (the "Cboe Member Portal copy service"). An interested Member can also elect to have Cboe Silexx transmit the resulting files to CAT on the Member's behalf (the "CAT reporting service"). The steps required for Members to complete registration, onboarding with CAT, and to make elections regarding the two Cboe Silexx services are listed below.

Production data test files for CAT Phase 2a (equities) and 2b (options) for Silexx, Pulse, and PAR users will be made available for verification and testing beginning [April 03, 2020](#). These production data test files will be available through the Cboe Member Portal. Note that test files for the Clearing Editor (supported by Cboe Options, C2 Options, BZX Options, and EDGX Options exchange) and Trade Add (supported by Cboe Options Exchange) applications are not available at this time. These applications are used for "manual" options-related events for which reporting is not applicable until Phase 2d. In addition, production test files for PAR are unavailable at this time due to the temporary closure of the Cboe Options trading floor.

Details

- **Registering and Onboarding with CAT:** A Member (referred to in CAT provisions as an "Industry Member") must complete the steps to register and onboard with CAT as a CAT Reporter. Information for CAT Reporters on how to gain access to the CAT Test and Production environments can be found on the "Registration & Onboarding" page of the www.catnmsplan.com website, located [here](#). Among other things, this webpage includes links to the FINRA CAT Industry Member Onboarding Guide (located [here](#)), and a CAT registration

presentation recording and related materials (located [here](#) and [here](#)). As detailed in the Onboarding Guide, an Industry Member must:

- Register at CAT. The registration form is located [here](#).
 - Submit a completed and signed CAT Reporter Agreement to FINRA CAT. A PDF of the CAT Reporter Agreement is located [here](#) (and a link to the DocuSign version is available under the “Forms” heading on the Registration & Onboarding page, located [here](#)). *(Note that the CAT Reporter Agreement must be submitted before Cboe Silexx will report data to CAT on behalf of an Industry Member for testing or production. Use of the CAT Industry Member Limited Testing Acknowledgement Form alone will not be sufficient.)*
 - Designate account administrators, create/entitle CAT User accounts for the CAT Reporter Portal, and request CAT Secure File Transfer Protocol (SFTP) accounts (if applicable). Additional information on the FINRA Entitlement Program is available under the “Forms” heading on the Registration & Onboarding page, located [here](#). In addition, a CAT Reporter Portal User Guide is located [here](#).
 - Manage connectivity and enroll in multi-factor authentication (MFA). A FINRA CAT Connectivity Supplement for Industry Members is located [here](#).
 - Establish CAT reporting relationships in the CAT Test environment, conduct testing for CAT Production readiness, and certify to CAT testing completion. For additional information CAT on Production readiness testing, please refer to this CAT presentation recording and related materials (located [here](#)). Please also refer to the CAT timeline (located [here](#)), and a recent SEC no action letter related to CAT reporting (located [here](#)) and the SROs’ statement on the no action letter (located [here](#)).
- **Enrolling in Cboe Silexx Services and Accessing Test Files:** To enroll for the Cboe Member Portal copy service and/or the CAT reporting service, a Member must submit a completed and signed CAT Data Services Agreement. The agreement is available upon request by contacting Cboe OSC or Cboe Silexx (contact information is listed below).
 - When completing the agreement, a Member will (i) provide general CAT reporter information which will determine the applications/platforms for which it is electing to receive the Cboe Member Portal copy service (i.e., PULSe, Silexx, PAR, and/or the Clearing Editor and Trade Add Tool); and (ii) indicate whether or not the Member is electing for Cboe Silexx to provide the CAT reporting service for the identified applications/platforms and CAT IMID(s).
 - A Member electing for Cboe Silexx to provide the CAT reporting service must also identify Cboe Silexx as a CAT Reporting Agent when registering and onboarding with CAT.
 - To begin the process, contact the Cboe Operations Support Center (“Cboe OSC,” for PULSe, PAR and/or Clearing Editor and Trade Add) or Cboe Silexx (for the Silexx workstations). There will be additional instructions provided at the point of contact.
 - Upon completion, a Member will be given access to test files via the Cboe Member Portal. Firm administrators will have to grant their users access to the respective test files via the Cboe Member Portal’s User Management Tool. The test files contain production data that can be utilized (by the Member or by Cboe Silexx on the Member’s behalf, as applicable) to submit to FINRA CAT to conduct testing for CAT Production readiness and to certify to CAT testing completion prior to the applicable CAT compliance dates.

- To the extent that a Member is using the CAT reporting service, the Member and Cboe Silexx will coordinate to select a date of production data to submit to CAT the testing/certification.

Useful Links

Additional information related to CAT Industry Member reporting requirements is available on the www.catnmsplan.com website, including information on the following:

- Industry Member Technical Specifications and Reporting Scenarios, located [here](#).
- FAQs, located [here](#).
- CAT Events, Announcements and Alerts, located [here](#).

Please contact the FINRA CAT Helpdesk at help@finracat.com or 888.696.3348 with any questions related to this website content.

Additional Information

Please contact Cboe OSC with any questions regarding Pulse, PAR, or Clearing Editor and Trade Add applications/platforms.

Please contact the Cboe Silexx Support with any questions regarding Silexx workstations.

Please also refer to the CAT Compliance Rule provisions in Chapter 7, Section B of the Cboe Options/C2 Options Rulebooks and in Rules 4.5 – 4.17 of the BYX/BZX/EDGA/EDGX Rulebooks. For any rules-related questions, please contact Cboe Regulatory Interpretations.

We appreciate your business and remain committed to powering your potential with Cboe products, technologies and solutions.

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