



Update - Consolidated Audit Trail (CAT) – “on Behalf of Reporting” Expanded in Preparation for CAT Phase 2D

Reference ID: C2021111201

Overview

Applicable Cboe Exchange: Cboe Options

Cboe Options Exchange and its affiliated entity, Cboe Silexx, LLC (“Cboe Silexx”), intend to expand the offering of CAT-formatted files to its TPHs to include order events from Market Maker Trade Notifications (MMTNs), Clearing Editor, Trade Add Tool, and Cboe Compression Service. Currently, CAT-formatted files are available for order events processed in Silexx and PAR.

To enable Cboe to provide TPHs these additional files, TPHs will need to execute a CAT Data Services Agreement (“Agreement”) with Cboe Silexx. By signing the Agreement, an interested TPH authorizes and directs Cboe Silexx to compile CAT order event information from the relevant applications/platforms and provide the resulting files to the TPH through the Cboe Member Portal (the “Cboe Member Portal copy service”). An interested TPH may also elect to have Cboe Silexx transmit the resulting files to CAT on the TPH’s behalf (the “CAT reporting service”). The steps required for TPHs to complete registration and onboarding with CAT, as well as to make elections regarding the two Cboe Silexx services, are listed below.

Details (Update)

- **Registering and Onboarding with CAT:** A TPH (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 with CAT. The registration form is located [here](#). An Industry 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.
 - Submit a completed and signed CAT Reporter Agreement to FINRA CAT. A PDF of the CAT Reporter Agreement is located [here](#), with a link to the DocuSign version available under

the “Forms” heading on the Registration & Onboarding page, located [here](#). **Please note:** 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, the 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 on CAT Production readiness testing, please refer to the CAT presentation recording and related materials (located [here](#)). Please also refer to the CAT timeline located [here](#), 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, an Industry 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 below).
 - When completing the agreement, an Industry 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., Silexx, PAR and/or the Clearing Editor, Trade Add Tool, and Compression Services); and (ii) indicate whether or not the Industry Member is electing for Cboe Silexx to provide the CAT reporting service for the identified applications/platforms and CAT IMID(s).
 - An Industry 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 Cboe OSC for PAR and/or Clearing Editor, Trade Add Tool, and Compression Services, or contact Cboe Silexx for the Silexx workstations. There will be additional instructions provided at the point of contact.
 - Upon completion, an Industry Member will be given access to test files via the Cboe Member Portal once test files are made available as announced by a future notice. 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 Industry Member or by Cboe Silexx on the Industry 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 an Industry Member is using the CAT reporting service, the Industry Member and Cboe Silexx will coordinate to select a date of production data to submit to CAT testing/certification.
- Industry Members should contact the CAT Helpdesk to determine whether certification is required for their firm.
- **Supplemental Information Required for Open Outcry Trading (MOOT) Events: (New)**
 - Industry Members, specifically Market Makers who transact on the Cboe Trading Floor, must provide a Firm Designated ID (FDID) for MOOT events. FDID information should be sent to osc@cboe.com. Please refer to the CAT Reporting FDID specifications (located [here](#)) and FDID overview (located [here](#)) for additional details regarding FDID requirements.
- **Production Test CAT-formatted Files:** ~~A future notice will be disseminated when test files will be made available.~~ MOOT events are now available for testing in the C1 certification environment.
- **Cboe Compression Service (CCS):** Cboe plans to update the [CCS user manual](#) to include CAT reporting functionality updates associated with CAT Phase 2d.
 - Cboe intends to require Industry Members who participate in the CCS to supply FDID and IMID information for CAT reporting purposes.
 - A future notice will be sent once these instructions have been finalized. Existing registered CCS participants will be contacted once CAT reporting functionality updates are published.

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 Silexx, PAR, Clearing Editor, and Trade Add Tool

Please contact Cboe Tradedesk with any questions regarding Compression Services 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.

Cboe Operations Support Center

866.728.2263

osc@cboe.com

Cboe Silexx Support

941.870.9531

Silexx-Support@cboe.com

Membership Services

913.815.7002

membershipservices@cboe.com

Cboe Regulatory Interpretations

312.786.8141

reginterps@cboe.com