Financial Industry Regulatory Authority

FINRA Advertising Regulation

Batch Submissions

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Revision history

Date	Editor	Comments
13 March 2005		Initial public draft
25 May 2007	Steve Spishak	Corrected three typos in XML schema; removed Kevin Ray from contact list; reformatted; merged content from original CTE letter from Amy Sochard.
13 June 2007	Steve Spishak	Added section clarifying how to get an FTP account.
23 August 2007	Steve Spishak	Rebranded for FINRA; updated XML schema and instructions as a result of changes coming in the 2007-03 release; updated contact list; minor corrections.
10 Sept 2007	Joyce Gregory	Changed contact information on pages 3 and 6. **This version was posted to AREF as part of the October 15 release.**
13 Sept 2007	Steve Spishak	Added some FTP account clarifications on page 3 – answers to questions posed by FINRA helpdesk
17 Sept 2007	Steve Spishak	Typo correction
30 Oct 2007	Steve Spishak	Added sections on refreshing CTE accounts and acquiring AREF credentials
14 Dec 2007	Steve Spishak	In Appendix A: corrected the spelling of WEBPUBLC (from WEBPUBLIC). Also added more descriptive language A for Rule Definition, Delivery Method, and Product List.
11 June 2008	Steve Spishak	Substantial corrections and clarifications based on most recent addition of a customer to the batch process.
22 Sept 2008	Steve Spishak	Changed production FTP hostname on page 10 and added IP address – this in response to OATS taking the old URL without advance notice. Also corrected a typo in the production RegFiling URL.
12 Jan 2009	Steve Spishak	Updated the "What you need to submit batch filings" and "FTP account on FINRA's servers" sections to reflect the fact that FTP accounts on PROD and CTE must be created separately (new information from Chuck Altemus). Also added a new "Document location" section below. Also corrected some incidental grammatical errors.
20 Feb 2009	Steve Spishak	Updated the URLs for both PROD and CTE on pages 7, 8, 10, and 11.
25 Feb 2009	Steve Spishak	Updated page 5 with a new URL and navigation path to the entitlement forms – no substantive change to any technologies.
30 June 2009	Steve Spishak	Updated with new Appendix ("Sample XML"), updated for CorpComm standards, minor textual edits.
27 May 2011	Steve Spishak	Minor updates to clarify EWS accounts, SFTP firewall issues, and payment; other minor edits.
16 Aug 2012	Jade Weidman	Added requirement that firms provide contact information, link to AREF tutorial; FTP server session close delay; included new URLs due to data center move; added Appendix F: Advertising Environment Summary; validated Appendix A: Field descriptions table and added delivery method descriptions; included new batch submission folder structure
19 Oct 2012	Steve Spishak	Corrected CTE IP address on final page.
1 Nov 2012	Steve Spishak	Added new product STRUCPRD.
9 Nov 2012	Steve Spishak	Added descriptions of RuleDefn changes going into effect 4 Feb 2013, and reinforced the recommendation of explicit logout on page 8.
9 Jan 2013	Steve Spishak	Corrected typo on page 16 (rule changes in 2013, not 2012).
28 Jan 2013	Jade Weidman	Changed the hyperlink to the FINRA Entitlement Form and added an instruction to select the checkbox labeled ADV.
19 Mar 2013	Jade Weidman	Added requirement in Appendix A: Field Descriptions Table that PaymentMethod is validated and not optional.

Document location

This document is available on FINRA.org via a link at the bottom of this page: http://www.finra.org/Industry/Compliance/RegulatoryFilings/Advertising/index.htm.

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Description

Through the use of XML files transmitted via file transfer protocol (FTP), Batch Submission enables FINRA member firms to submit a large volume of Advertising filings directly to a secure server and to automate and streamline the submission process.

Firms with a high volume of advertisements (typically around 500 per year or more) may find that batch submission is more efficient than manually submitting pieces to FINRA one at a time using the AREF (Advertising Regulation Electronic Filing) web site.

Implementation steps for firms new to batch submission

Typically, the steps to start using Batch Submission look like the following:

1. Read this document thoroughly;
2. Have a preliminary conversation with FINRA;
3. Acquire all necessary accounts and verify connectivity to FINRA;
4. Settle upon an FTP mechanism or FTP client software;
5. Develop XML-constructor software, working through any questions with FINRA;
6. Upload several test XML files to FINRA's Customer Test Environment (CTE) and work out any issues with XML formatting and the upload process;
7. Acquire verification from FINRA that the test files were received properly;
8. Begin uploading actual advertisements to FINRA's production servers.

Firms must provide contact information

FINRA makes announcements regarding AREF and the Advertising batch submission system. Therefore, please provide contact information for both a technical contact as well as a business contact. It is strongly recommended that this information is kept updated. Please send the contact information to Jade Weidman (jade.weidman@finra.org) and Steve Spishak (steve.spishak@finra.org).

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What you need in order to submit batch filings

To submit batch filings, you need **five** things:

1. Advertisements as structured data,
2. Structured data converted to XML file,
3. An EWS account with entitlements to AREF (the same account will work for the Customer Test Environment as well as the production environment),
4. FTP access to FINRA,
5. FTP accounts on FINRA's FTP servers (one account each on the Customer Test Environment and the production environment).

Note that the three accounts in numbers 3 and 5 are distinct accounts, each with their own username and password.

1. Advertisements as structured data

You will need to build a database of advertisements, including the advertisements themselves (in PDF format), together with the associated metadata required for filing on AREF (e.g., date of first use, name of principal that approved the communication, whether the communication will be preceded or accompanied by a prospectus, etc.).

2. Structured data converted to XML file

You will also have to develop a tool to consolidate all data (the PDF documents and associated data fields (See Appendix A) and additional communications) into a single batch file that conforms to the XML schema (See Appendix C) that FINRA provides.

There are no constraints on the naming of XML files, except that XML files must not begin with the string "**RPT**_" (because that is reserved for the return files created by the system).

3. EWS account with entitlements to AREF

Access to the vast majority of FINRA systems is controlled by EWS (FINRA Enterprise Web Security) accounts. Typically users of FINRA systems need only one username and password to access all applications to which they are entitled.

To submit a batch filing, two accounts are needed: one to allow the FTP server to accept the file, and one to get the data into AREF (Advertising Regulation Electronic Filing).

If your firm is currently submitting advertisements electronically to FINRA, then you already have at least one user with entitlements to AREF, and those credentials could be used.

If your firm does not currently submit electronically, you can ask your firm account administrators – the people at your firm who have the rights to create EWS accounts – to create and entitle a new account.

If you cannot determine your account administrators, please call the FINRA Call Center at (800) 321-6273, and select option 1 for entitlements questions. The operator can help you more easily if you know your firm's CRD number.

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If you need to change one of your account administrators, the correct form is "FINRA Entitlement Form FILE TRANSFER Applications FTP User" located here: http://www.finra.org/web/groups/industry/@ip/@comp/documents/industry/p126932.pdf, or navigate through this path:

FINRA Home >
Industry Professionals >
Compliance tab >
(Right hand side) FINRA Entitlement Program >
Entitlement Information for FTP/IFT Users>
FTP Entitlement Form & Instructions+

Within Section 4 – Entitlement Privileges, please select the checkbox labeled, “ADV File Transfer” to add or remove entitlements for Advertising File Transfers.

Note that for security reasons, the password on this account must be changed every 120 days.

4. FTP access to FINRA

You will need to determine whether or not your firm has already established FTP access to FINRA’s servers in order to submit other regulatory information. The Regulation Filing Administrator within your firm can provide you with this information. Questions regarding obtaining access to the system can be directed to (800) 321-6273.

Note that while most FTP clients can support the technical requirements of Batch Submission, FINRA cannot provide technical support for any client other than clients supported by Secure Transport from Axway (formerly Tumbleweed). Some of FINRA’s customers elect to use other software, and this is fine, provided that firms understand that it is their responsibility to be sufficiently proficient with their applications.

FINRA supports both HTTPS (port 443) and SFTP (port 22). HTTPS is generally easier because the port is generally open. If, however, the customer prefers SFTP, FINRA must open a port on its firewall, tied to a specific source IP address on the customer’s side. This process requires a bit of paperwork and a lead time measured in weeks.

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5. FTP account on FINRA's servers

Beyond the ability to connect and transmit via FTP to FINRA (described above), you will also need FTP credentials. These credentials are just for the FTP server and are completely different from the normal FINRA EWS (Enterprise Web Security) credentials that are used for most web-based applications.

FTP credentials must be requested by one of your firm's account administrators – these are special users at your firm who have the ability to create accounts.

How to determine who your account administrators are

- If you have a login to the Regulatory Filing Applications (RFA) systems
  - Login to **https://regfiling.finra.org**.
  - Click the "Change Password" tab on the top navigation bar.
  - Click the "Account Administrators" tab on the side navigation bar.
  - System will display the account administrators list for your account.
- If your firm submits any electronic data to FINRA (for Advertising or using FINRA's Regulatory Form Filing Applications), someone in those departments is likely to be the account administrator.
- If you cannot determine your account administrators, please call the FINRA Call Center at (800) 321-6273, and select option 1 for entitlements questions. The operator can help you more easily if you know your firm's CRD number.

How account administrators can request a new FTP account

- For an FTP account on the **PRODUCTION** server, please read the page http://www.finra.org/Industry/Compliance/Entitlement/P121158 and follow instructions under "Entitlement Information for File Transfer Applications FTP Users"
- For an FTP account on the **CTE** (customer test environment) server, please e-mail your request to dl-rfasupport@finra.org

A note about FTP accounts

You will need a separate account for both the CTE (Customer Test Environment) and the production environments.

Accounts on the production and CTE FTP servers are not synchronized, so even if you create an account with the same username on both servers, the passwords can be different, and changes to one will not cascade to the other.

It is recommended that the CTE and production accounts be named differently with different passwords to avoid confusion.

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Submission and review process – CTE (test environment)

The below instructions refer explicitly to FINRA's **Customer Test Environment** (CTE), which is a sandbox offered to firms who are developing automated interfaces to FINRA's systems, and populates only QC databases on FINRA's side (not actual production systems).

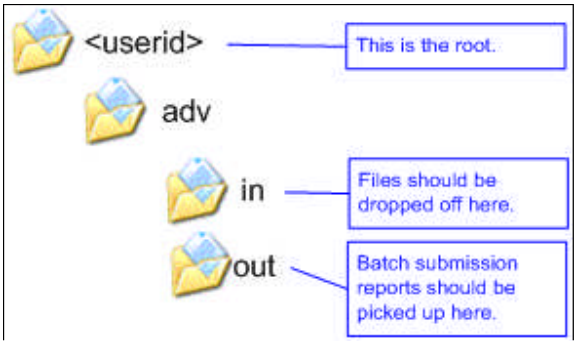
This CTE interface should be used by firms to **test** the batch submission process (with help from FINRA), **before using the production system**.

Submissions or other actions in the CTE will have no effect on actual filings by your firm within the production AREF system.

The CTE is not covered by an SLA, and is therefore not guaranteed to be up at all times, particularly weekends.

To submit the file

- Log into the FTP servers
  - See Appendix F for environment parameters
  - Specify SFTP or HTTPS
  - Authenticate in with a valid FTP account
    - Note that the FTP servers will lock out an account after 3 consecutive failed attempts to connect, so verify your username and password carefully if you experience an error.
- The diagram below illustrates FINRA's batch submission folder structure. Note the two child folders: one is used to deposit files ("in") and a different folder is used to retrieve FINRA submission reports ("out").



  - For file submissions: **`cd adv/in`**
  - For report retrievals: **`cd adv/out`**

- Put the batch XML file in your FTP account directory. (Example: `Put xxxxx.xxx` where `xxxxx.xxx` is the file on your computer to be sent to FINRA)

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To retrieve the output file

After the file transfer is complete, two files are placed back into your FTP directory. The first file is a text formatted output report (See Appendix D) called RPT_xxxxx.1 (where xxxxx is the complete filename you uploaded to FINRA). The second file is an XML formatted output report (See Appendix B) called RPT_xxxxx.xml.

As a matter of general practice, the output file should be available in the "out" folder within one hour from the time the FTP connection is closed, **not when the upload is complete**.

FINRA recommends that firms' scripts include an explicit logout after all files have been uploaded: FINRA's system processing (which produces the output files) will not begin until after the session is closed (whether explicitly or via a timeout).

Reminder: the output files are retrieved from the "out" folder, not the "in" folder where the files are dropped off.

- Get your output reports (Example: Get RPT_xxxxx.xml or Get RPT_xxxxx.1)

In addition to getting batch submission reports directly from the FTP server, these same reports are maintained on the AREF system for two weeks.

- Log into the Regulation Filing Application Customer Test Environment (CTE): https://filetransfer.qa.finra.org
- Click on the Advertising Regulation tab
- Click on the Job Status tab
- Locate the submitted job(s)
- Click the "Open" link to view the Batch Submission Report (See Appendix D)

To review submitted packets

Following the submission, you can review the packets using the AREF system.

- From the Job Status screen, click the "Submissions" tab.
- Change the search parameter from "Unread" to "Pending" then click the "List" button.
- Refer to the Batch Submission Report for a list of your Advertising reference numbers.
- Click the "Dtl" link to access the Packet Details screen for the selected packet.

Note: packet reference numbers submitted by batch end with "/B" (for example FR2005-0101-0001/B)

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Submission and review process – Production

The below instructions refer explicitly to FINRA's **production environment**.

Submissions in the Production environment will be treated as actual filings by your firm.

FINRA's production environment mirrors the customer test environment. So, once you have completed all test processes and are ready to use the production system, the instructions that precede this section remain the same, except for the following environment- specific variables:

- Production Regulation Filing Application environment is: https://filetransfer.finra.org
- Production FTP accounts must be acquired, if you do not already have them.

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Common issues

Can log into CTE but not production FTP server (or vice versa)

Accounts on the production and CTE FTP servers are not synchronized, so even if you create an account with the same username on both servers, the passwords can be different, and changes to one will not cascade to the other.

To change the CTE password the administrator (using his or her production account and password must log on to the CTE web site.

“Invalid Submitter user id” (expired user accounts in CTE)

Two sets of credentials are needed to execute a batch submission:

- the FTP account, which allows the file to be transferred, and
- the EWS (FINRA Enterprise Web Security) account, the username of which is embedded in the XML and allows access to the Advertising systems.

The second of those accounts (the EWS account) is subject to periodic deletion as part of an occasional refresh of the CTE databases.

If you should be testing in CTE and receive a Batch Submission report with an error message similar to the below message, it is likely that the EWS account, while still valid, has been deleted from the CTE environment:

```
REJECTED RECORDS

REL    XTRNL                PIECE                          REFERENCE #
COMM#  REF                  TITLE                          ERROR MESSAGE
-------------------------------------------------------------------------------
1   11   Invalid Submitter user id for Org Id xxxx CrdUserId yyyy
```

This is your firm CRD number

This is your EWS username, used to authenticate against Advertising systems

To correct this, please ensure that you are using the correct account – the EWS account, and not the FTP account.

Invalid XML errors

XML is a standard protocol for representing structured data. This standard allows and disallows various characters. Disallowed characters often have a substitute string that will be translated to that character. For just one example, the special character "&" (ampersand) causes a failure in XML. If you wish to use it literally, you must use “&” for ampersand character. Please consult the XML standard for more details.

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Can a firm use both Batch and online AREF at the same time?

Yes, both batch and online AREF work together. A firm can submit some filings by batch and others online. Filings submitted by batch can be viewed online and online is used to submit subsequent communications if they are not included in the original submission.

Is there an additional cost to submitting filings by batch?

There is no additional cost for filing by batch. Filing charges are the same whether the filing is submitted by batch, by online AREF or by hard-copy.

How many FTP Logins can each firm have?

Each firm can only have a single FTP login.

If the firm submits files for multiple regulatory filings by FTP, for example SHORTS, BLUESHEETS, etc., the same FTP account is used for each of these regulatory filings.

If the firm operates multiple BD Numbers, each BD number must have its own FTP login.

Can Service Providers batch file on behalf of Member Firms?

Service providers are defined as organizations who are not FINRA Member Firms, but whom have been engaged by FINRA Members Firms to process work on behalf of those firms. The AREF System does not directly support Service Providers and FINRA does not maintain a relationship with Service Providers for purposes of AREF. However, individual Member Firms are free to engage Service Providers to perform work on their behalf.

If a FINRA Member Firm does engage a Service Provider, the Member Firm is responsible for providing all access, including user ids and passwords, to that Service Provider as indicated in the several sections above. Additionally, the Member Firm remains responsible for all connections and filings the Service Provider makes on behalf of that Member.

If a Service Provider is engaged by more than one Member Firm, each Member Firm must provide the Service Provider with a separate account for each firm.

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Getting help

To access important information about AREF, please visit http://www.finra.org/Industry/Compliance/RegulatoryFilings/Advertising/index.htm.

For a video tutorial on how to access and use the AREF application, please visit http://apps.finra.org/tutorials/aref_final.htm.

For questions about the review process and any business requirements, please contact Advertising Regulation at (240) 386-4500.

For technical assistance, please contact the FINRA Call Center at (800) 321-6273, and specify that your issues are with the "**Batch Submission feature on the RFA platform.**" The call center will route your query to the Technology group that supports Batch Submission.

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Appendix A: Field descriptions table

XML TAG	Required or Optional	Description	Format	Comments
SubmitterEWSLogin	Required	EWS login of the person submitting the communication on behalf of the firm.	String – 20 characters	See firm EWS administrator for Login ID.
ReviewType	Required	Expedited or Regular review	String Valid values: **Expedited** **Regular**	
PaymentMethod	Required	The account from which the filing fees will be deducted: (1) ADV Account, (2) CRD, (3) Credit card, or (4) Check	String Valid Values: **ADV** **CRD** **CC** **CHK**	Although this is currently a required field, the value is ignored.
RecipientEWSLogin	Required	EWS login of the person to whom the comment letter should be addressed.	String – 20 characters	See firm EWS administrator for Login ID.
Title	Required	Title of the advertisement or sales literature.	String – up to 160 characters	
NumberOfPages	Required	Number of pages of the sales literature or advertisement.	UnsignedShort – up to 4 characters	
Preceded	Required	Preceded or accompanied by prospectus?	String – 1 character Valid Values: **Y** **N**	
DateOfFirstUse	Required	Date the communication will be used.	mm/dd/yyyy	
~~PrincipalName~~	~~Required~~	~~Registered principal who approved the communication.~~	~~string – up to 50 characters~~	~~Removed Q3 2007~~

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XML TAG	Required or Optional	Description	Format	Comments
PrincipalTitle	Required	Title of the registered principal who approved the communication.	String – up to 50 characters	
PrincipalID	Required	The CRD number of the Registered Principal who approved the communication.	String – up to 12 characters	New as of Q3 2007
DateOfApproval	Required	Date the registered principal approved the communication.	mm/dd/yyyy	
FirmExternalRef	Optional	Firm's internal tracking number.	String – up to 24 characters	
~~TickerSymbol~~	~~Optional~~	~~Ticker symbol for the primary security discussed in the sales literature or advertisement.~~	~~String – up to 14 characters~~	Removed Q3 2007
RelatedFINRARef	Optional	Related FINRA Reference Number of a previous filing which may be related.	String – 16 characters (eg: FRyyyy-mmdd-nnnn)	Do not include the "/B", "/H", "/E" suffixes.
CommunicationUses	Optional	Explain how the sales literature or advertisement is to be used.	String – up to 255 characters	**31,500 characters are allowed in the web interface, but not in batch**
DeliveryMethod	Required	Delivery method is determined by the format in which the material is being used or the medium through which it is being distributed. Valid values to the right are current as of August 2012; please check the AREF system for the most up-to-date list. Only one delivery method may be specified per piece. If a piece is to be delivered via multiple methods, that piece must be submitted to FINRA once for each delivery method.	String – up to 8 characters Valid values: **ACCTMSSG** (Account statement related communications) **ARTICLE** (Articles and third party reprints) **BDUSE** (Broker Dealer use only material) **BROCHURE** (Brochures, pamphlets, and catalogs) **DISC/TPE** (Audio/video tapes, CDs, and DVDs)	New as of Q3 2007

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XML TAG	Required or Optional	Description	Format	Comments
			ELECMSSG (Email, IM, SMS, or text messages) **FUNDFACT** (Fund-specific information sheets) **HANDOUT** (Flyers and other hand-delivered material) **MAILING** (Mailed sales material) **PERFREPT** (Periodic and other performance reports) **PHONE** (Telemarketing and other phone scripts) **PRESSREL** (Information related to the press) **PRINT AD** (Print advertisements, posters, and signs) **RADIO** (Radio advertisements and broadcasts) **RESEARCH** (Research reports – equity and debt) **SEMINAR** (Seminar-related communications) **SOFTWARE** (Software output and IA tools) **STATIONE** (Business-related stationery) **TV** (TV advertisements and broadcasts) **WEBPUBLC** (note that "i" is missing) (Web information – public access)	

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XML TAG	Required or Optional	Description	Format	Comments
			WEBPASS (Web information – password protected)	
RuleDefn	Required	Indicate the Rule Definition applicable for this advertisement. Only one rule Definition is applicable to each communication. Valid values to the right are current as of the date of this document; please check the AREF system for the most up-to-date list. See *Regulatory Notice 12-29* for information regarding the new Rule Definition values in place February 4, 2013.	String – up to 8 characters **Valid values for communications first used <u>before</u> February 4, 2013:** **ADVT** (advertisement) **SALLIT** (sales literature) **CRSPC** (correspondence) **INSALMT** (institutional sales material) **PBLCAPP** (public appearance) **INDREPRT** (independently prepared reprint as defined in Rule 2210(a)) **Valid values for communications first used <u>on or after</u> February 4, 2013:** **RETAIL** (retail communications) **INSTCOMM** (institutional communications) **CORRESP** (correspondence)	New as of Q3 2007 Provide the string and count to stored procedure.

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XML TAG	Required or Optional	Description	Format	Comments
ProductList	Required	Product List enables firms to select the main type(s) of product(s) being solicited or promoted in the material submitted for review. Multiple Product Types are applicable to each communication. Valid values to the right are current as of August 2012; please check the AREF system for the most up-to-date list.	String – up to 8 characters Valid values: **529PLANS** **BONDS** **CDS** **CLOSED** **CMO** **DAYTRADE** **DISCOUNT** **DPP** **ETF** **FIXEDINS** **GENERAL** **GOVT** **HEDGEFUN** **MUNI** **MUTUALS** **NOTES** **OPTIONS** **OTHER** **PRIVPLMT** **REITS** **SFUTURES** **STOCKS** **STRUCPRD** (available 1 Nov 2012) **UIT** **VA** **VLI**	New as of Q3 2007 Provide the string and count to stored procedure.

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XML TAG	Required or Optional	Description	Format	Comments
RegisteredRep	Optional	Indicate the CRD IDs of the registered representatives for this communication. Maximum 5 values.	String – up to 12 characters	New as of Q3 2007 Provide the string and count to stored procedure.
WtgReviewlttr	Required	Indicate whether they are waiting for Review letter for the submitting communication	String – 1 character Valid values: **Y** **N** (default)	New as of Q3 2007
IncludesPerfRanking	Optional	Indicate whether Performance Ranking is submitted with this communication.	String – 1 character Valid values: **Y** (if Y, then 2nd PDF must be present) **N** (default) **[blank]**	New as of Q3 2007
IncludesAddtnlInfo	Optional	Indicate whether Additional Information is submitted with this communication.	String – 1 character Valid values: **Y** (if Y, then 3rd PDF must be present) **N** (default) **[blank]**	New as of Q3 2007

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XML TAG	Required or Optional	Description	Format	Comments
CommPurpsCd	Optional	Communication purpose code **Required if IncludesAddtnlInfo = 'Y'.** Only one value is required. Maximum of one value allowed.	String – up to 8 characters Valid values: **FILRESPO** (FINRA REQUESTED INFO) **RESPNASD** (RESPOND TO FINRA REVIEW LETTER) **PERFRANK** (PERFORMANCE RANKING OF AN INVESTMENT COMPANY) **COVERLTR** (COVER LETTER) **SUPRTDOC** (SUPPORTING DOCUMENTATION) **PROSPCTS** (PROSPECTUS OR OTHER OFFERING DOCUMENT) **RESPFINR** (RESPOND TO FINRA REVIEW LETTER)	New as of Q3 2007

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XML TAG	Required or Optional	Description	Format	Comments
NotesTx	Optional	Optional notes if providing Additional Information (IncludesAddtnlInfo = 'Y'). This string differs from PDF document three in that this is a description, while the PDF is the actual document. Examples of text that could be entered in this fields include the following: "This document replaces document submitted on 5/12/2008. Original document did not print to pdf correctly." or "This piece was revised after it was originally submitted."	String – up to 4,000 characters	New as of Q3 2007
PDF	Required	PDF file to submit for review.	base64Binary (Refer to XML documentation for more info.)	Limit 15MB per file.
PDF	Optional	2nd PDF file to submit for review. **Required if IncludesPerfRanking = 'Y'**	base64Binary	New as of Q3 2007 Limit 15MB per file.
PDF	Optional	3rd PDF file to submit for review. **Required if IncludesAddtnlInfo = 'Y'**	base64Binary	New as of Q3 2007 Limit 15MB per file.

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Appendix B: Sample XML

This is an example of a valid XML submission.


```
<CommunicationList>
        <Communication>
                <SubmitterEWSLogin>SAMPLE1</SubmitterEWSLogin>
                <ReviewType>REGULAR</ReviewType>
                <PaymentMethod>CC</PaymentMethod>
                <RecipientEWSLogin>SAMPLE1</RecipientEWSLogin>
                <Title>Sample Title1</Title>
                <NumberOfPages>11</NumberOfPages>
                <Preceded>Y</Preceded>
                <DateOfFirstUse>04/01/2007</DateOfFirstUse>
                <PrincipalTitle>Chief Compliance Officer</PrincipalTitle>
                <PrincipalID>9999999</PrincipalID>
                <DateOfApproval>04/01/2007</DateOfApproval>
                <FirmExternalRef>XXX</FirmExternalRef>
                <RelatedFINRARef>XXX</RelatedFINRARef>
                <CommunicationUses>Uses comment text goes here</CommunicationUses>
                <DeliveryMethod>ARTICLE</DeliveryMethod>
                <RuleDefn>INDREPRT</RuleDefn>
                <ProductList>529PLANS</ProductList>
                <ProductList>GENERAL</ProductList>
                <RegisteredRep>9999999</RegisteredRep>
                <RegisteredRep>9999999</RegisteredRep>
                <WtgReviewlttr>N</WtgReviewlttr>
                <IncludesPerfRanking>Y</IncludesPerfRanking>
                <IncludesAddtnlInfo>Y</IncludesAddtnlInfo>
                <CommPurpsCd>FILRESPO</CommPurpsCd>
                <NotesTx>Any Note can go in this field</NotesTx>
```


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```
            <PDF>JVBERi0xLjMNJeLjz9MNCjMzIDAgb2JqPDwvSFs5MzYgMzMxXS9MaW5lYXJpemVkIDEvRSA3ODg0My9MIDc4ODM4MS
            9OIDgvTyAzNi9UIDc4NzY3ND4+DWVuZG9iag0gICAgICAgICAgICAgICAgICAgMCBuDQowMDAwNzg3NDQxIDAwMDAwIG4NC
            nRyYWlsZXINCjw8L1NpemUgMzM+Pg0Kc3RhcnR4cmVmDQoxMTYNCiUlRU9GDQoA</PDF>
            <PDF>JVBERi0xLjINJeLjz9MNCjE2IDAgb2JqDTw8IA0vTGluZWFyaXplZCAxIA0vTyAxOCANL0ggWyA3NDIgMjM3IF0gDS9MIDE
            5NTExIA0vRSAxMTUxNCANL04gMyANL1QgMTkwNzMgDT4+IA1lbmRvYmoNPl0NPj4Nc3RhcnR4cmVmDTM4NjA3DSUlRU9GD
            Q==</PDF>
            <PDF>JVBERi0xLjINJeLjz9MNCjE2IDAgb2JqDTw8IA0vTGluZWFyaXplZCAxIA0vTyAxOCANL0ggWyA3NDIgMjM3IF0gDS9MIDE
            5NTExIA0vRSAxMTUxNCANL04gMyANL1QgMTkwNzMgDT4+IA1lbmRvYmoNPl0NPj4Nc3RhcnR4cmVmDTM4NjA3DSUlRU9GD
            Q==</PDF>
        </Communication>
</CommunicationList>
```


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Appendix C: Text version of the XML schema

Note that this is an XML **schema**, and not a sample XML document of the type that would be uploaded. If you are unclear on the difference between a schema definition and an actual XML document, please spend some time brushing upon XML basics before beginning your development.

```
<?xml version="1.0" encoding="utf-8" ?>
<xs:schema elementFormDefault="qualified" xmlns:xs="http://www.w3.org/2001/XMLSchema">
    <xs:element name="CommunicationList">
        <xs:complexType>
            <xs:sequence>
                <xs:element minOccurs="1" maxOccurs="unbounded" ref="Communication" />
            </xs:sequence>
        </xs:complexType>
    </xs:element>
    <xs:element name="Communication">
        <xs:complexType>
            <xs:sequence>
                <xs:element name="SubmitterEWSLogin" type="xs:string" nillable="false">
                    <xs:annotation>
                        <xs:documentation>Person submitting the communications on behalf of the firm</xs:documentation>
                    </xs:annotation>
                </xs:element>
                <xs:element name="ReviewType" type="xs:string" nillable="false">
                    <xs:annotation>
                        <xs:documentation>Review Type - valid value ("EXPEDITED", "REGULAR")</xs:documentation>
                    </xs:annotation>
                </xs:element>
                <xs:element name="PaymentMethod" type="xs:string" nillable="false">
                    <xs:annotation>
                        <xs:documentation>Payment Method - valid value ("ADV", "CRD","CC", "CHK")</xs:documentation>
                    </xs:annotation>
                </xs:element>
                <xs:element name="RecipientEWSLogin" type="xs:string" nillable="false">
                    <xs:annotation>
                        <xs:documentation>Person to whom the Comment Letter should be addressed</xs:documentation>
```


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```
        </xs:annotation>
    </xs:element>
    <xs:element name="Title" type="xs:string" nillable="false">
        <xs:annotation>
            <xs:documentation>Piece Title</xs:documentation>
        </xs:annotation>
    </xs:element>
    <xs:element name="NumberOfPages" type="xs:unsignedShort" nillable="true">
        <xs:annotation>
            <xs:documentation>Number of Pages</xs:documentation>
        </xs:annotation>
    </xs:element>
    <xs:element name="Preceded" type="xs:string" nillable="false">
        <xs:annotation>
            <xs:documentation>Preceded or accompanied by prospectus - valid value ("Y", "N")</xs:documentation>
        </xs:annotation>
    </xs:element>
    <xs:element name="DateOfFirstUse" type="xs:string" nillable="false">
        <xs:annotation>
            <xs:documentation>Date of First Uses in MM/DD/YYYY format</xs:documentation>
        </xs:annotation>
    </xs:element>
    <xs:element name="PrincipalTitle" type="xs:string" nillable="false">
        <xs:annotation>
        <xs:documentation>Registered Principal's Title</xs:documentation>
        </xs:annotation>
    </xs:element>
    <xs:element name="PrincipalID" type="xs:string" nillable="false">
        <xs:annotation>
            <xs:documentation>Registered Principal's ID</xs:documentation>
        </xs:annotation>
    </xs:element>
    <xs:element name="DateOfApproval" type="xs:string" nillable="false">
        <xs:annotation>
            <xs:documentation>Approval Date in MM/DD/YYYY format</xs:documentation>
        </xs:annotation>
```


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```
</xs:element>
<xs:element name="FirmExternalRef" type="xs:string" nillable="true">
    <xs:annotation>
        <xs:documentation>Firm External Reference Number</xs:documentation>
    </xs:annotation>
</xs:element>
<xs:element name="RelatedFINRARef" type="xs:string" nillable="true">
    <xs:annotation>
        <xs:documentation>Related FINRA Reference number</xs:documentation>
    </xs:annotation>
</xs:element>
<xs:element name="CommunicationUses" type="xs:string" nillable="true">
    <xs:annotation>
        <xs:documentation>Explanation how to use communication</xs:documentation>
    </xs:annotation>
</xs:element>
<!-- Added the following section (Begin) -->
<xs:element name="DeliveryMethod" type="xs:string" nillable="false">
    <xs:annotation>
        <xs:documentation>Delivery Method</xs:documentation>
    </xs:annotation>
</xs:element>
<xs:element name="RuleDefn" type="xs:string" nillable="false">
    <xs:annotation>
        <xs:documentation>Rule Definition</xs:documentation>
    </xs:annotation>
</xs:element>
<xs:element name="ProductList" type="xs:string" nillable="false" minOccurs= "1" maxOccurs="unbounded">
    <xs:annotation>
        <xs:documentation>Product List</xs:documentation>
    </xs:annotation>
</xs:element>
<xs:element name="RegisteredRep" type="xs:string" nillable="true" minOccurs= "0" maxOccurs="5">
    <xs:annotation>
        <xs:documentation>Registered Rep. ID</xs:documentation>
    </xs:annotation>
```


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```
                </xs:element>
                <xs:element name="WtgReviewlttr" type="xs:string" nillable="false">
                    <xs:annotation>
                        <xs:documentation>Review Letter for the submitting communiation - valid value ("Y", "N")</xs:documentation>
                    </xs:annotation>
                </xs:element>
                <xs:element name="IncludesPerfRanking" type="xs:string" nillable="true">
                    <xs:annotation>
                        <xs:documentation>Includes Performance Ranking - valid value ("Y", "N")</xs:documentation>
                    </xs:annotation>
                </xs:element>
                <xs:element name="IncludesAddtnlInfo" type="xs:string" nillable="true">
                    <xs:annotation>
                        <xs:documentation>Includes Additional Information - valid value ("Y", "N")</xs:documentation>
                    </xs:annotation>
                </xs:element>
                <xs:element name="CommPurpsCd" type="xs:string" nillable="true">
                    <xs:annotation>
                        <xs:documentation>Communication Purpose Code - required if IncludesAddtnlInfo = Y</xs:documentation>
                    </xs:annotation>
                </xs:element>
                <xs:element name="NotesTx" type="xs:string" nillable="true">
                    <xs:annotation>
                        <xs:documentation>Note - optional if IncludesAddtnlInfo = Y</xs:documentation>
                    </xs:annotation>
                </xs:element>
                <!-- Added the following section (End) -->
                <xs:element name="PDF" type="xs:base64Binary" nillable="false" minOccurs= "1" maxOccurs="3"/>
            </xs:sequence>
        </xs:complexType>
    </xs:element>
</xs:schema>
```


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Appendix D: Text version of the batch submission report

```
                                        ADVERTISING BATCH SUBMISSION

FIRM ID:         9999                                        FIRM NAME:            MY FIRM, INC.
JOB ID:          123456                                      FIRM FILE NAME:       MY_FILE.XML
RCVD    AT:      1/24/2005 1:02:02 PM
COMPLETED AT:    1/24/2005 1:30:00 PM

SUMMARY
-------
Total number of communications processed:           5
Number of communications accepted:                  3
Number of communications rejected:                  2
Total estimated filing fee for accepted filings:    $300


REJECTED RECORDS

RELATIVE        EXTERNAL      PIECE TITLE                          REFERENCE#/ERROR MESSAGE
COMM#           REF#
-------------------------------------------------------------------------------------------------------------
3               2499999C      Variable Universal Life Insurance   Invalid Reference Number:FR9999-9999-0003
5               2499999E      Friends of the Firm                 no data found in advrg cntct for Org ID 9999


ACCEPTED RECORDS

RELATIVE        EXTERNAL      PIECE TITLE                          REFERENCE#/ERROR MESSAGE
COMM#           REF#
-------------------------------------------------------------------------------------------------------------
1               2499999A      401(k) fund Presentation            FR9999-9999-0001
2               2499999B      Reach for the Stars Advertisement   FR9999-9999-0002
4               2499999D      Advantage Shareholder Newsletter    FR9999-9999-0004
```


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Appendix E: XML schema of the output report

Note that this is an XML **schema**, and not a sample XML document of the type that would be uploaded. If you are unclear on the difference between a schema definition and an actual XML document, please spend some time brushing upon XML basics before beginning your development.

```
<?xml version="1.0" encoding="utf-8" ?>
<xs:schema elementFormDefault="qualified" xmlns:xs="http://www.w3.org/2001/XMLSchema">
    <xs:element name="ADVBatchUploadReport">
        <xs:complexType>
            <xs:sequence>
                <xs:element name="ReportHeader" nillable="false">
                    <xs:complexType>
                        <xs:sequence>
                            <xs:element name="ReportTitle" type="xs:string" />
                            <xs:element name="FirmID" type="xs:string" />
                            <xs:element name="FirmName" type="xs:string" />
                            <xs:element name="JobID" type="xs:string" />
                            <xs:element name="FirmFileName" type="xs:string" />
                            <xs:element name="RcvdAt" type="xs:string" />
                            <xs:element name="CompletedAt" type="xs:string" />
                        </xs:sequence>
                    </xs:complexType>
                </xs:element>
                <xs:element name="ReportSummary" nillable="true">
                    <xs:complexType>
                        <xs:sequence>
                            <xs:element name="CommunicationsProcessed" type="xs:string" />
                            <xs:element name="CommunicationsAccepted" type="xs:string" />
                            <xs:element name="CommunicationsRejected" type="xs:string" />
                            <xs:element name="EstimatedFilingFee" type="xs:string" />
                        </xs:sequence>
                    </xs:complexType>
                </xs:element>
                <xs:element name="RejectedCommList" nillable="true">
                    <xs:complexType>
                        <xs:sequence>
```


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```
                        <xs:element name="CommData" type="CommData" maxOccurs="unbounded" minOccurs="0" />
                    </xs:sequence>
                </xs:complexType>
            </xs:element>
            <xs:element name="AcceptedCommList" nillable="true">
                <xs:complexType>
                    <xs:sequence>
                        <xs:element name="CommData" type="CommData" maxOccurs="unbounded" minOccurs="0" />
                    </xs:sequence>
                </xs:complexType>
            </xs:element>
        </xs:sequence>
    </xs:complexType>
</xs:element>
<xs:complexType name="CommData">
    <xs:sequence>
        <xs:element name="RelativeComm" type="xs:string" />
        <xs:element name="ExternalRef" type="xs:string"  nillable="true"/>
        <xs:element name="PieceTitle" type="xs:string" />
        <xs:element name="Ref_Err_Msg" type="xs:string" />
    </xs:sequence>
</xs:complexType>
</xs:schema>
```


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Appendix F: Advertising Environment Summary

	Customer Test Environment (CTE) (a mirror of production, BUT WITH A DIFFERENT DATABASE OF CREDENTIALS)	Production
To get FTP credentials ("ADV File Transfer" entitlement)	e-mail your request to dl-rfasupport@finra.org	Read the page http://www.finra.org/Industry/Compliance/Entitlement/P121158 and follow instructions under "Entitlement Information for File Transfer Applications FTP Users"
To validate your FTP Credentials **To connect via FTP**	https://filetransfer.qa.finra.org	https://filetransfer.finra.org
To change your FTP password	https://accountmgmt-qc1.finra.org/myews/changepassword.jsp	https://accountmgmt.finra.org/myews/changepassword.jsp
To get EWS (website) credentials	The same credentials are used for both CTE and Production. Contact your firm's EWS SAA (Super Account Administrator) and request that he or she grant access for the "Reg – Advertising Regulation" entitlement	
To validate your EWS (website) credentials, test them using this URL	https://regfilingtest.finra.org (click AREF & then click New Communication tab. If the Registration Information page appears, fill it out and save; otherwise the account is valid).	https://regfiling.finra.org (click AREF & then click New Communication tab. If the Registration Information page appears, fill it out and save; otherwise the account is valid).
SFTP server IP address	198.202.241.37	75.98.61.45

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