

Filing Website Content in Native File Format

A new feature of FINRA Advertising Regulation’s ongoing Input Format Expansion initiative allows member firms the option to file website content to Advertising Regulation in native file format. Such content can be submitted via either the AREF user interface or the “Batch v2” format of the batch filing system. (Note: The older “Batch v1” format of the batch filing system is no longer being enhanced and will not be compatible with the “native format” filing option for websites.)

This new feature is supplemental to existing methods for filing website content and is completely optional. Firms may decide which method to use on a filing-by-filing basis. Existing approved methods for filing website content (e.g., capturing as PDFs) will continue to be supported indefinitely.

Communication File Format

The collection of files (such as graphics and other resources) that constitute a captured website, are to be assembled in a single .ZIP archive. This file will subsequently be submitted as a *Communication File* (preferred) or as *Additional Information* on the filing. The .ZIP file format is widely accepted standard for compressed archives and .ZIP files can easily be created using free or built-in utilities available on most contemporary operating systems.

Requirements

The files and folders in the .ZIP file for submission may be organized in whatever manner works best for the filer’s chosen capture method, with no limit as to the number of files or subfolders it contains.

The resulting compressed .ZIP archive, however, must abide by the following requirements:

- **Point-in-time fidelity:** Within the .ZIP archive, each individual web page being submitted for review must be captured in its entirety, including all required resources such as graphics or scripts, in such a way as to produce an accurate offline rendering of the web page as it existed at the *point-in-time of the filing*.
- **Offline Browsable:** The captured content submitted for review, as presented in the ZIP archive, once expanded, must be served up entirely from the collection of files in the archive. There can be no dependency on external resources to render a specific filed web page. All hyperlinks pertinent to filed content must be localized / relative to the resources (files) in the archive.
- **Manifest File:** Each .ZIP archive, when expanded, must contain ONE (and *only one*) manifest file at the root level named [AdRegFilingManifest.html](#) *exactly*. This manifest file must be a separate HTML file that provides a listing of clickable links to each web page as it has been captured and exists within the archive. The manifest file must only include links to pages that are found within the expanded .ZIP archive, and must include a separate link to every web page that is being submitted for review. Web pages will be reviewed by Advertising Regulation if and *only if* they are listed on and correctly linked from the manifest file. For more information and technical details please see the “Creating a Manifest File” section below.
- **File Size:** Any single .ZIP file may not exceed 500MB in size. If the filed website content exceeds that limit, it must be captured in multiple .ZIP files. Each additional .ZIP file may be submitted as *Additional*

Information on the filing. However, each .ZIP file must *independently* abide by the above requirements and contain its own manifest file linking only to web pages contained within the same archive.

“WebPages” Unit Type

An additional unit type of *WebPages* has been added to the existing unit types (*Pages* and *Minutes*) in both the AREF and Batch v2 filing systems. When filing website content in native format, filing size should be expressed in terms of *WebPages*. The number of *WebPages* in a filing will be determined by the number of page links (specific URLs) listed on the manifest file. Each link on the manifest file should represent one distinct *WebPage* and only those *WebPages* listed and counted will be considered for review as part of the filing submission.

Capture Methods

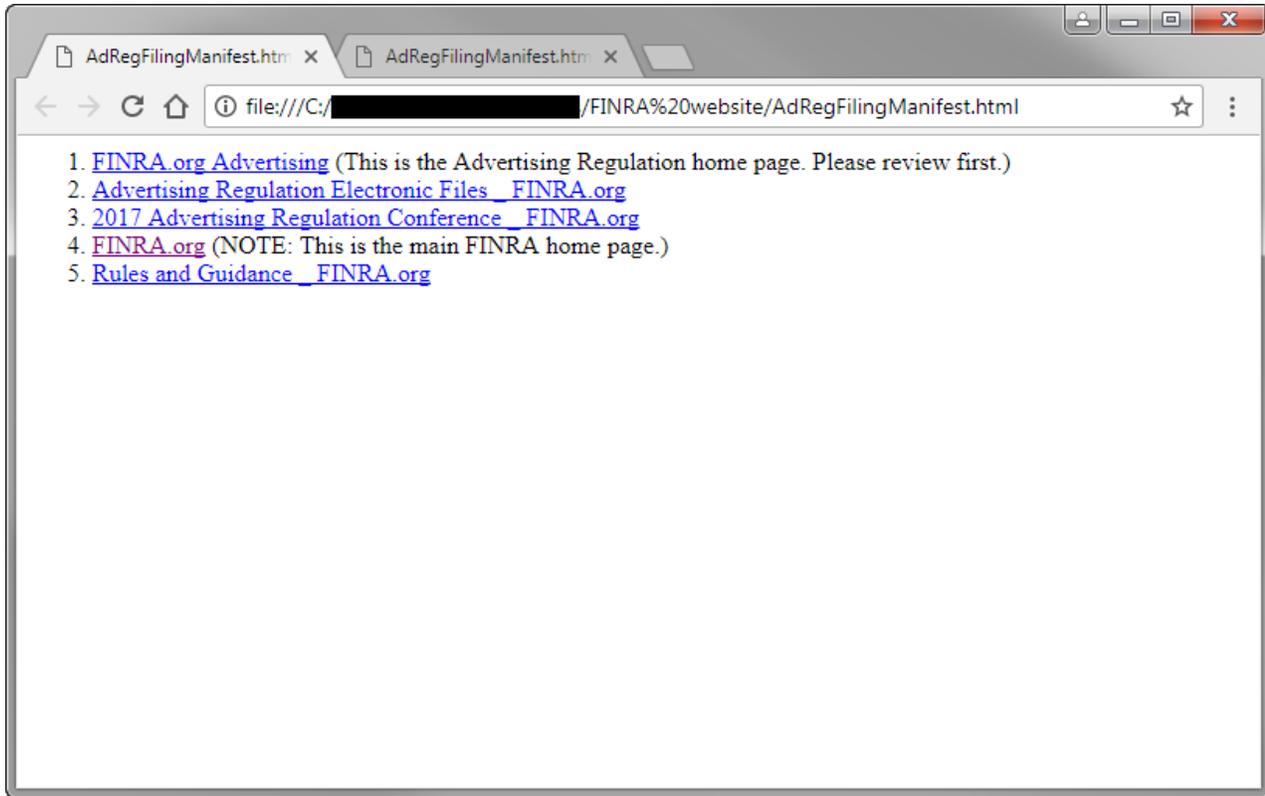
There are many methods for capturing website content in native format ranging from saving as “Webpage, Complete” in the browser itself to custom-developed scripts and sophisticated third-party archiving platforms. The method used to capture and organize website content for submission to FINRA Advertising Regulation is entirely at the discretion of the filer. The only stipulation is that whatever method is selected must capture content that is consistent with the requirement for point-in-time fidelity. To be considered for review, the content must be offline-viewable and accurately represent the complete web page(s) as they existed at the time of filing. **NOTE: Dynamic content that is generated by ad-hoc server calls over the internet cannot be evaluated since it may change at any time and would not necessarily reflect a static state at the time of filing.**

Creating a Manifest File

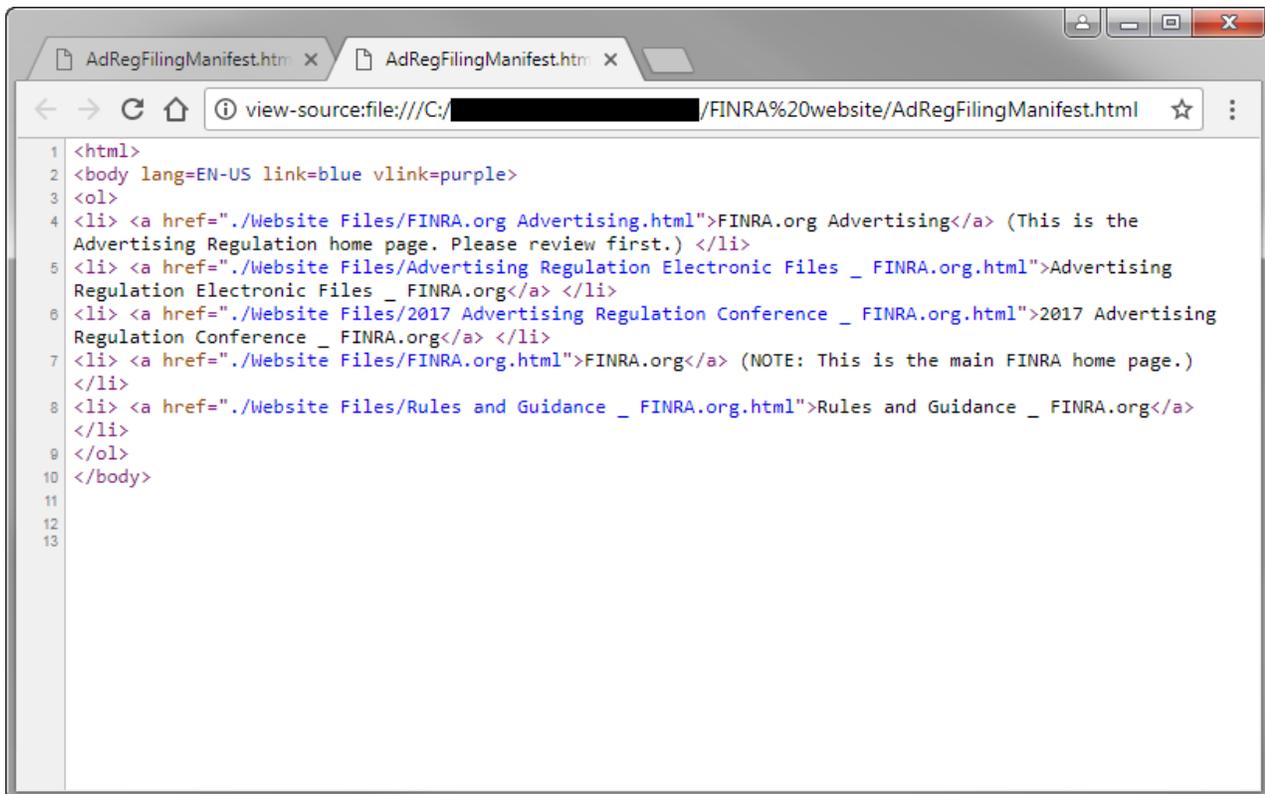
The required manifest file is essential to an accurate review of filed website content. It provides the Advertising Regulation analyst with a precise roadmap to follow, indicating exactly which captured pages need to be reviewed. As such, every acceptable manifest file will have the following requirements:

- It must be a properly constructed HTML file viewable in any web browser
- It must be named **AdRegFilingManifest** and have a **.html** file extension and must be located at the root level of the expanded .ZIP archive. Any filed .ZIP archives that do not contain **AdRegFilingManifest.html** will be rejected.
- It must contain a list of clickable links and the target of each link must be to a *local* version of the page (i.e., captured within the ZIP archive) reflecting the point-in-time of capture. If the list contains more than 10 links, each link should be numbered.
- Brief comments may be added beside the link (on the same line) but other non-text content such as icons or graphics should be avoided if possible
- Visited links should change color once clicked to indicate that a particular page has been viewed. (This is standard web page behavior. No code should be included that suppresses it.)

The image below shows an example of a basic manifest file as it might appear when viewed in a browser:



And the HTML source code for the above manifest file is shown in the image below:



When distilled to its most basic elements, the HTML code required to create a working manifest file is shown below:

```
<html>
<body lang=EN-US link=blue vlink=purple>
<ol>
  <li> <a href="./[RELATIVE PATH TO PAGE]">[PAGE TITLE]</a>[OPTIONAL COMMENT] </li>
  [REPEAT <li>...</li> FOR EACH PAGE]
</ol>
</body>
```

Additional HTML code may be present depending on what tools are used to create the manifest file, but its behavior and general formatting should be as described above. It is strongly recommended that the manifest file be tested thoroughly and each link be verified prior to submitting the compressed .ZIP archive of captured website content for review.

Help

If you require assistance or have additional questions about filing website content in native file format, please contact Advertising-Technology@finra.org