

OATS Reporting Technical Specifications

June 10, 2016

Production: November 7, 2016 Certificate Test: September 26, 2016

TO	Senior Management		
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	○ Operations		
FROM	FINRA, Market Regulation		
SUBJECT	OATS Reporting Technical Specifications		
DATE	6/10/2016		

Enclosed is the latest edition of the *OATS Reporting Technical Specifications*, dated June 10, 2016. All updates to this and other documentation regarding OATS are posted to the OATS Web Pages available via the FINRA Web Site at *www.finra.org/oats*.

This edition includes:

- New requirements for FINRA Rule 4554 Alternative Trading Systems Recording and Reporting Requirements of Order and Execution Information for NMS Stocks.
- New allowable values for Special Handling Codes.

Other than the new allowable values for Special Handling Codes, all other changes described in the June 10, 2016 edition of the *OATS Reporting Technical Specifications* apply only to ATSs for orders in NMS stocks. Firms who are not ATSs and ATSs that do not receive orders in NMS stocks are not required to make any changes related to FINRA Rule 4554.

The changes described in this edition are scheduled to be available for testing in the OATS Certificate Test environment on September 26, 2016 and are scheduled to go into the OATS Production environment on November 7, 2016.

Changes not related to FINRA Rule 4554:

- ➤ Additional permitted values for **Special Handling Codes** and **Desk Special Handling Codes**:
 - o ALO Add Liquidity Only
 - o OPO Opt Out of Locked Market
 - o STP Self Trade Prevention
- > Renamed **Tick Pilot Participation Flag** to **Participation Flag**. Tick participants who are not ATSs need not make any changes related to this field.
- > Renamed ECN Flag Field to ATS Display Indicator.

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Changes related to FINRA Rule 4554 (applicable only to ATSs who receive orders in NMS stocks):

- Added the **Order Display Modification Report** The Order Display Modification Report is applicable only to ATSs that display orders outside of the ATS in NMS stocks. (refer to Appendix C for the Report definition)
- ➤ New allowable values and updates to existing values for **ATS Display Indicator** (formerly called **ECN Flag**):
 - o 'S' ATS displays orders outside of ATS to subscribers only
 - o 'N' ATS does not display orders outside of ATS
 - o 'Y' ATS displays orders outside of ATS via public quotation
 - o <blank> Not an ATS
 - o Field must be populated if the Order Receiving Firm is an ECN or is an ATS in an NMS stock.
- ➤ New allowable value for **Participation Flag** (renamed from **Tick Pilot Participation Flag**)
 - o 'Y' Firm is an ADF Trading Center
- > Enhanced validations for existing fields which apply to ATSs:
 - o Routable Flag
 - o Display Size
 - o Special Handling Codes limited set of codes permitted for use by ATSs.
- Added the following new fields to **NW**, **OR**, **OE** and **CR Reports**:
 - o **ATS Order Type** unique identifier representing the specific order type offered by the ATS.
 - o **NBBO Bid Price** indicates the NBB price in effect at the time of order receipt.
 - o NBBO Ask Price indicates the NBO price in effect at the time of order receipt.
 - o **NBBO Source** indicates the market data feed used to obtain the NBBO (or relevant reference price) at the time of order receipt.
 - o **NBBO Matching Engine Lookup Date** indicates the date on which the NBBO was referenced upon receipt of the order by the matching engine.
 - o **NBBO Matching Engine Lookup Time** indicates the time at which the NBBO was referenced upon receipt of the order by the matching engine.
 - o **Display Price** displayed price
 - o **ADF Quote ID** indicates the Quote Identifier provided by the ADF.
 - o **Processing Sequence Number** Indicates the Processing Sequence Number assigned to the order by the ATS's matching engine.
- Added the following new fields to **OE** and **EX Reports:**
 - o **NBBO Bid Price at Execution** indicates the NBB price in effect immediately prior to order execution
 - NBBO Ask Price at Execution indicates the NBO price in effect immediately prior to order execution
 - o **NBBO Source at Execution** indicates the market data feed used to obtain the NBBO (or relevant reference price) immediately prior to order execution.

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- NBBO Matching Engine Lookup Date at Execution indicates the date on which
 the NBBO was referenced by the matching engine immediately prior to order
 execution.
- NBBO Matching Engine Lookup Time at Execution indicates the time at which
 the NBBO was referenced by the matching engine immediately prior to order
 execution.
- > Updated validations for existing codes: (Refer to Appendix B for the full definition)
 - o 2162 Missing or Invalid ATS Display Indicator
 - o 2147, 2148, 2149, 2150, 2151, 2509, 2510, 2511, 2513, 2514 Invalid Special Handling Code
 - o 2801 Missing or Invalid Participation Flag
 - o 2802 Missing or Invalid Display Size
 - o 2803 Missing or Invalid Routable Flag
 - o 2804 Missing or Invalid Retail Investor Order Flag
- Added new validations: (Refer to Appendix B for the full definition)
 - o 2806 Missing or Invalid NBBO Bid Price
 - o 2807 Missing or Invalid NBBO Ask Price
 - o 2808 Missing or Invalid NBBO Source
 - o 2809 Missing or Invalid NBBO Matching Engine Lookup Date
 - o 2810 Missing or Invalid NBBO Matching Engine Lookup Time
 - o 2811 Missing or Invalid ATS Order Type
 - o 2812 Invalid Processing Sequence Number
 - o 2813 Missing or Invalid ADF Quote ID
 - o 2184 Missing or Invalid NBBO Bid Price at Execution
 - o 2815 Missing or Invalid NBBO Ask Price at Execution
 - o 2816 Missing or Invalid NBBO Source at Execution
 - o 2817 Missing or Invalid NBBO Matching Engine Lookup Date at Execution
 - o 2818 Missing or Invalid NBBO Matching Engine Lookup Time at Execution
 - o 2819 Missing or Invalid Order Display Modification Timestamp
- ➤ Alternative Feed Notification for NBBO Source FINRA will provide an email address for ATSs to notify FINRA that an alternative NBBO source was used for a period of time. ATSs will specify the feed that they used as the alternative source using the values of SIP (S), Direct Feed (F), or Hybrid (H). In addition, the email from the firm must include the trade date, time the ATS began using the alternative source, time the ATS reverted back to its normal source, and the securities impacted. The email is due to FINRA by 12:00pm EST on the business day following the date the alternative feed was used. The email address will be provided in a separate OATS Report to be published before the CT Release date.
- ➤ Register ATS Order Types The OATS Web Interface will provide a manual data entry mechanism for ATSs to provide Order Types offered by the ATS 20-days in advance of the Order Type becoming effective. Information required includes the Order Type Name, Order Type Definition, Order Type Unique Identifier used to report to OATS, and effective date. ATS orders will be rejected if reported with an Order type that is not registered with OATS. ATSs may begin providing FINRA with Order Types on the OATS CT Release date.

This version of the OATS Reporting Technical Specifications contains the following changes:

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Chapter	Change	
Chapter 1	Updated to include description of FINRA Rule 4554	
Chapter 2	None	
Chapter 3	None	
	Updates for the additional of the Order Display Modification; Added reporting scenarios for the reporting of the Order Display Modification	
Chapter 4	Report.	
Chapter 5	Added new Order Display Modification Report	
Chapter 6	None	
Chapter 7	None	
Chapter 8	None	
Appendix A	Added new fields. Updated definitions and allowable values.	
Appendix B	Updated validations.	
Appendix C	Added new fields to existing report; Added new Order Display	
	Modification Report; Updated allowable values and validations.	
Appendix D	Added new terms.	

To obtain the latest information or answers to questions about OATS and the *OATS Reporting Technical Specifications*, contact FINRA Business and Technology Support Services. Support Services provides firms and third parties with necessary information to comply with the Rules and to develop, test, and implement their order—reporting applications. FINRA Business Support is available Monday through Friday from 8:00 a.m. until 6:00 p.m., Eastern Time. FINRA Technical Support is available from Monday at 8:00 a.m. through Saturday at 8:00 a.m., Eastern Time. Please provide your Broker/Dealer Number (if appropriate), name, title, firm's name, and a phone number when contacting Support Services via phone, fax, or e—mail. General information is maintained on the OATS Web Pages at www.finra.org/oats.

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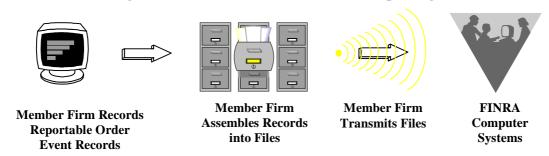
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1. Introduction

The Order Audit Trail System (OATS) is part of an integrated audit trail of order, quote, and trade information for all NMS stocks and OTC equity securities ("OATS reportable securities"). This audit trail system, developed by NASD in response to the August 1996 settlement with the Securities and Exchange Commission (SEC), is used in FINRA's surveillance activities.

FINRA Rules 7400 through 7470 (OATS Rules) and FINRA Rule 4554, require member firms to develop a means for electronically capturing and reporting to OATS order data on specified events in the life cycle of each order for OATS reportable securities, including convertible bonds, and to record the times of these events to the second. Figure 1-1 provides an overview of the Order Audit Trail System reporting process. In addition, OATS Rules require member firms to synchronize all business clocks used to record the time and date of market events to a time source designated by FINRA. (For a summary of rule requirements, see Section 1.1.)

Figure 1-1. An Overview of the OATS Reporting Process



The *OATS Reporting Technical Specifications* provide member firms with a resource for understanding their responsibilities to comply with FINRA Rules 7400 through 7470 and FINRA Rule 4554 and describe the requirements for reporting order data to OATS, including detailed information about system access and the required data elements. The *OATS Reporting Technical Specifications* also inform member firms about the procedures for implementing OATS, including registering with FINRA and testing the interface between their systems and the systems at FINRA.

This document is not intended to provide information about how to develop an electronic system that reports order information or how to program OATS reporting software; it is only intended to describe what such a system must deliver to FINRA. Table 1-1. describes the contents and purpose of the *OATS Reporting Technical Specifications*.

Description 1. Introduction Describes the purpose of the system and provides an overview of FINRA rules and the technical requirements. 2. Clock Synchronization Describes the purpose and requirements of the clock synchronization portion of the rules. 3. System Access Describes the ways FINRA member firms must supply OATS information to FINRA. 4. Order Reporting Scenarios Describes, from a business perspective, responsibilities for reporting to OATS. Explicitly defines events and provides representative scenarios. 5. Data Reporting Formats Provides detailed specifications for the layout of OATS files. 6. Feedback and Corrections Describes the procedures for obtaining feedback and submitting corrections to OATS. Describes the procedures required for testing the interface 7. Testing between member firm systems and OATS. 8. Additional Information Describes OATS reporting hours and late criteria, data retention requirements, and how to get answers to questions

about OATS.

any type of OATS report.

Order Report files.

Describes each data element, including permitted values, in

Describes the detailed specifications for the layout of Firm

Defines the words and phrases with meanings unique to FINRA Rules 7400 through 7470, FINRA Rule 4554 and the

Defines all error messages generated by OATS.

OATS Reporting Technical Specifications.

Table 1-1. Contents and Purpose of OATS Reporting Technical Specifications

1.1 Rule Overview

FINRA Rule 7400 - Order Audit Trail System

Rule 7400 is simply a place marker for the Order Audit Trail System Rules.

FINRA Rule 7410 - Definitions

Appendix A—Data Dictionary

Appendix B-Error Messages

Appendix C—Report Formats

Appendix D-Glossary

Rule 7410 lays out specific definitions of terms used for the purposes of Rules 7400 - 7470. Terms not specifically defined shall have the same meaning as those defined in the By-Laws and Rules of the Association.

FINRA Rule 7420 - Applicability

Rule 7420 applies the OATS Rules to all FINRA members. Further, the rule requirements apply to all orders for OATS reportable securities whether they are executed or not.

FINRA Rule 7430 - Synchronization of Member Business Clocks

Rule 7430 requires any FINRA member firm that records order, transaction or related data to synchronize all business clocks used to record the date and time of any market event. Clocks, including computer system clocks and manual time stamp machines, must record time in hours, minutes and seconds with to-the-second granularity and must be synchronized to a source that is synchronized to within one second of the National Institute of Standards' (NIST) atomic clock. Clocks must be synchronized once a day prior to the opening of the market, and remain in synch throughout the day. In addition, firms are to maintain a copy of their clock synchronization procedures on-site. Clocks not used to record the date and time of market events need not be synchronized.

FINRA Rule 7440 - Recording of Order Information

Rule 7440 requires each reporting member to record the following types of order events: receipt or origination of an order (New Order Report); transmission of the order within a firm (Desk Report); transmission of the order outside the firm (Route Report, Combined Order/Route Report); cancellation or modification of the order (Cancel, Cancel/Replace Reports); execution of the order (Execution Report, Combined Order/Execution Report). Each required record of time shall be recorded in hours, minutes, and seconds and each order report is required to include specific pieces of detailed information as outlined in the rule.

FINRA Rule 7450 - Order Data Transmission Requirements

All required order data must be transmitted to FINRA in electronic format. Data may be transmitted electronically via FTP, SFTP, IFT, OATS Web Interface, or through a third party such as a service bureau or clearing firm. Any member that uses a third party to transmit order data on their behalf must have a written agreement with the third party outlining the respective functions and responsibilities of each party. The member firm retains ultimate responsibility to ensure full compliance with the FINRA OATS Rules.

FINRA Rule 7460- Violation of Order Audit Trail System Rules

Failure to comply with the OATS Rules may be considered conduct that is inconsistent with high standards of commercial honor and just and equitable principles of trade, in violation of Rule 2010.

FINRA Rule 7470- Exemption to the Order Recording and Data Transmission Requirements

Rule 7470 authorizes staff to grant limited exemptive relief from the OATS reporting and recording requirements for manual orders, if such exemption is consistent with the protection of investors and the public interest, and the member meets the following criteria:

1. The member and current control affiliates and associated persons of the member have not been subject within the last five years to any final disciplinary action, and within the last ten years to any disciplinary action involving fraud;

- 2. The member has annual revenues of less than \$2 million;
- 3. The member does not conduct any market making activities in NMS stocks or OTC equity securities;
- 4. The member does not execute principal transactions with its customers (with limited exception for principal transactions executed pursuant to error corrections); and
- 5. The member does not conduct clearing or carrying activities for other firms.

FINRA Rule 4554- Alternative Trading Systems – Recording and Reporting Requirements of Order and Execution Information for NMS Stocks

Rule 4554 requires ATSs to record and report additional information at the time of order receipt and at the time of order execution. Additional data elements are required to be reported by ATSs that display subscriber orders and by those that are registered as ADF Trading Centers.

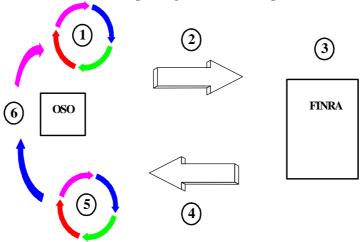
OATS Rules became effective as follows:

- o March 1, 1999 for electronic orders in Nasdaq-listed equity securities received at the trading desk of market makers and for all electronic orders received by ECNs
- o August 1, 1999 for all electronic orders in Nasdaq-listed equity securities
- o July 10, 2006 for all orders in Nasdaq-listed equity securities
- o February 4, 2008 for all orders in OTC equity securities
- October 17, 2011 for all orders in NMS stocks

1.2 Technical Requirements

The OATS Reporting Technical Specifications has been created specifically to describe the technical requirements for reporting order data to OATS. It provides detailed information about the required data elements and formats, transmission methods, and OATS feedback. Figure 1-2. provides an overview of OATS reporting technical requirements and information flow.

Figure 1-2. Overview of OATS Reporting Technical Requirements and Information Flow



- 1. Order Sending Organizations (OSOs) generate Reportable Order Events records (ROEs) and package them in Firm Order Report files (FOREs). They could also enter the ROEs directly into the OATS Web Interface.
- 2. The OSO transmits the FOREs to OATS using FTP, SFTP, IFT, or the Web.
- 3. OATS validates the FOREs and ROEs.
- 4. OATS generates FORE status within one hour. It is available via the original method of transmission or the Web. (NOTE: For files submitted via FTP, SFTP, or IFT, firms must "pull" status from OATS. OATS will not "push" information to OSOs via FTP, SFTP, or IFT.) Firms may obtain additional feedback, including ROE rejections and reporting statistics, via the Web, FTP, SFTP, and IFT.
- 5. OSOs correct any rejected FOREs or ROEs.
- 6. OSOs generate new ROEs, repackage them in FOREs, and submit the new files to OATS. Alternatively, OSOs can use the Web interface to repair ROE rejections and correct erroneous ROEs already accepted by OATS.

For additional information about OATS, compliance issues, and OATS reporting technical requirements, contact FINRA Business and Technology Support Services. Technology support is available from 8:00 a.m. Monday to 8:00 a.m. Saturday, Eastern Time. Business support is available Monday through Friday, 8:00 a.m. to 6:00 p.m., Eastern Time. FINRA Business and Technology Support Services can be reached via fax, e-mail, or the Web 24 hours per day, 7 days a week. Please provide your name, title, firm's name, Broker/Dealer Number (if appropriate), and a phone number when contacting Support Services via phone, fax or e-mail.

Technical Support Business Support

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OATS REPORTING TECHNICAL SPECIFICATIONS

INTRODUCTION

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2. Clock Synchronization

FINRA Rule 7430 requires member firms that record order, transaction, or related data required by the By-Laws or other rules of FINRA to synchronize all business clocks, including both computer system clocks and mechanical time stamping devices, that are used to record the date and time of any market event. In addition, the rule requires that member firms maintain the synchronization of such business clocks. These requirements were effective according to the following schedule:

- By August 7, 1998, for all computer system clocks, and
- By July 1, 1999, for all mechanical clocks.

The rules also require that the granularity of all order event timestamps for OATS reportable events, generated by both computer systems and mechanical time stamping devices, be in seconds. **This time must be reported to OATS in Eastern Military (24 hour clock) Time.** All computer system clocks and mechanical time stamping devices must be synchronized to within one second of the National Institute of Standards and Technology (NIST) atomic clock. Any time provider may be used for synchronization, however, all clocks and time stamping devices must remain accurate within a one-second tolerance of the NIST clock. This tolerance includes all of the following:

- The difference between the NIST standard and a time provider's clock
- Transmission delay from the source
- The amount of drift of the member firm's clock

NOTE: The tolerance for clock synchronization does not affect the amount of time allowed for reporting OATS reportable events. For example, the OATS rules **do not** require firms to report order information within one second of receiving an order from a customer.

Computer system and mechanical clocks must be synchronized every business day before market open in order to ensure that recorded order event timestamps are accurate. To maintain clock synchronization, clocks should be checked against the standard clock and re-synchronized, if necessary, at pre-determined intervals throughout the day.

Compliance examinations include a review for the existence of adequate procedures and checks to fulfill this obligation, as well as a test of the degree of accuracy of clocks that are used for providing audit trail information against the NIST standard. In order to facilitate examinations, member firms must document and maintain their clock synchronization procedures. In addition, member firms should keep a log of the times when they synchronize their clocks and the results of the synchronization process. This log should include notice of any time the clock drifts more than 1 second. This log should be maintained for the period of time and accessibility specified in SEC Rule 17a-4(b), and it should be maintained and preserved for the required time period in paper format or in a format permitted under SEC Rule 17a-4(f).

Additional information about clock synchronization is available from NIST and other sources. The U.S. Department of Commerce's National Technical Information Service (NTIS) at (703) 605-6000 offers the *NIST Time and Frequency Users Manual* (item number PB91-107532).

Some useful sources on the Internet include:

http://tf.nist.gov/service/acts.htm

http://tycho.usno.navy.mil

http://tf.nist.gov

http://tf.nist.gov/service/its.htm

http://tf.nist.gov/general/receiverlist.htm http://tf.nist.gov/general/softwarelist.htm

http:/www.time.gov

This list of information about clock synchronization is not exclusive. Further information about clock synchronization is available from government agencies, commercial software providers, commercial mechanical time stamping device manufacturers, and through the Internet.

FINRA has no affiliation with any of the organizations listed above or the creator of any of the Web Pages listed above. Furthermore, FINRA makes no representations regarding the accuracy of the information listed.

For additional information about clock synchronization and the requirements of Rule 7430, see the OATS Frequently Asked Questions (FAQs) available on the FINRA Web Site (http://www.finra.org/oats).

3. System Access

This section provides the specifications that an Order Sending Organization (OSO) requires to develop systems to supply information to OATS. NOTE: Not all OSOs are required to develop systems to supply information to OATS; OSOs may contract with other member firms or non-member entities to transmit information to OATS.

The goal of FINRA in developing these specifications is to provide simple and reliable information flow mechanisms that allow OSOs to minimize development and operational complexity by using off-the-shelf products and industry standards while providing hardware and operating system software independence. This section discusses transport options, security considerations, network options, and registration requirements designed to achieve this goal.

3.1 Network Options

FINRA supports two network interfaces: a private circuit based network and an Internet gateway. These two networks are discussed below. Figure 3-1. shows the very high-level details of these network options.

OSO
OSO
OSO
OSO
OSO
OSO
OSO
OSO

CENTURYLINK/SAVVIS Switch

Protocols: IFT (HITPS), SFTP

FINRA

Figure 3-1. Network Options

3.1.1 OATS/CENTURYLINK Network

FINRA has contracted with CENTURYLINK to create a private dedicated network to connect any OSO to FINRA facilities. Your CENTURYLINK representative can arrange for the appropriate connection bandwidth based on your average daily volume of data transmission. OSOs can use the OATS/CENTURYLINK network for File Transfer Protocol (FTP) or Secure File Transfer Protocol (SFTP) file submission and file status retrieval. Each OSO requesting OATS/CENTURYLINK network connectivity or connectivity between its existing networks and the OATS/CENTURYLINK network will be expected to execute a contract for service with CENTURYLINK. Firms may contact the Sales Department at CENTURYLINK directly via phone (800-728-8471, Option 2) for details of this contractual arrangement.

3.1.2 Internet

Users access OATS via the Internet using Internet File Transfer (IFT), SFTP or the Web. Internet users are expected to maintain their own contracts with the ISP of their choice.

3.2 Transport Options

FINRA provides four mechanisms for OSOs to submit files to OATS: FTP, SFTP, IFT and the OATS Web interface. Files sent via FTP must be transferred via the OATS/CENTURYLINK network. If the submission is via SFTP, the file may be transferred via the Internet or the OATS/CENTURYLINK network. Files transferred via IFT may be transmitted using the SecureTransport TM software or may be manually uploaded. If the submission is via the OATS Web interface, it is sent by typing the ROE data directly into the Web page. Information submitted to OATS via the Web interface may be downloaded prior to submission by the firm via the Web interface for data retention purposes.

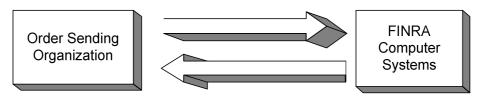
Figure 3-2 illustrates the three basic types of OATS information: submissions (i.e., files of order events, including original ROEs, resubmitted ROEs that were previously rejected, and corrections or deletions to previously accepted ROEs), feedback (i.e., FORE status, ROE rejections, and reporting statistics), and administrative information.

Figure 3-2. Information Flows and Allowable Access Methods

FTP/SFTP/IFT: FORE submission

Web: Original ROE entry, ROE corrections and repairs, administrative

information



FTP/ SFTP/ IFT: FORE Status, ROE rejections, Announcements, Unmatched Execution Reports, Unmatched Exchange Route Reports, Unmatched Interfirm

Reports

Web: FORE Status, ROE rejections, Statistics, Announcements, Unmatched Execution Reports, Unmatched Exchange Route Reports, Unmatched

Interfirm Reports

3.2.1 Access Methods

Table 3-1. summarizes the transport methods and information items that are pertinent to each transport method.

Table 3-1. Summary of Information Items Pertinent to Each Access Method

Access Method	FTP	SFTP	IFT	Web
Network	OATS/	OATS/	Internet	OATS or Internet
	CENTURYLIN	CENTURYLIN		
	K	K or Internet		
File & Resubmitted Rejections	✓	✓	✓	
Submission				
File Status	✓	✓	✓	✓
Interactive ROE entry				✓
Report Statistics				✓
Web Announcements				✓
FTP/SFTP/IFT	✓	✓	✓	
Announcements				
Account Maintenance				√
Unmatched Events	✓	✓	✓	√

3.2.1.1 FTP

FTP is available via the OATS/CENTURYLINK network; it is not available via the Internet. OSOs must use a version of FTP software that is compatible with RFC 959. OSOs should use US ASCII mode and binary mode for transmission.

Organizations must contact the Sales Department at CENTURYLINK directly via phone (800-728-8471, Option 2) to obtain an OATS circuit. Circuit orders require approximately 120 days for processing. Organizations that order their circuits late may not have adequate time for testing before their implementation date.

3.2.1.2 SFTP

SFTP can be used to transmit encrypted secure files via the OATS/CENTURYLINK network or the public Internet. OSOs must use a version of SFTP software that is compatible with RFC 4253.

OSOs submitting via SFTP over the Internet are required to maintain a static IP address and must contact FINRA Technical Support to associate the static IP address with FINRA's firewall. OSOs must allow for a 30 day period for the firewall and network setup to be put in place.

3.2.1.3 IFT

IFT is available directly through the Internet or through the Internet using the Tumbleweed SecureTransport TM software from Axway. Firms may purchase the SecureTransport TM Windows client, SecureTransport TM UNIX client version, or upload files manually via the Internet. Information on how to obtain the Tumbleweed SecureTransport TM software is available using the following URL: https://portal1.tumbleweed.com/frstore/TMWDStore

3.2.1.4 Web

Web access to the OATS system is available via the Internet. The OATS Web interface will be optimized for the latest versions of Internet Explorer, Chrome, Firefox, and Safari, which are available using the following URL:

http://www.finra.org/upgrade

NOTE: A non-export version of the supported Web browsers will be required in order to meet the security requirements (security is described in more detail below). In order to obtain access to the OATS Web interface, users must have their browsers configured to accept and maintain cookies.

Table 3-2. summarizes the specifications for each access method.

Table 3-2. Summary of Transport Specifications

FTP	SFTP	IFT	Web
 25MB uncompressed file size limit RFC 959 No encryption Binary mode US ASCII mode Must use OATS/CENTURYLIN K private circuit 	 25MB uncompressed file size limit RFC 4253 Encryption Binary mode May use OATS/CENTURYLIN K or Internet. If Internet is used, a static IP address must be used and registered with FINRA 	 25MB uncompressed file size limit Internet Secure Transport TM client software from Axway or manual upload No encryption 	 Latest versions of Internet Explorer, Chrome, Firefox, and Safari SSL encryption Server-side certificates HTML 3.2 or higher Cookies Internet or private network

3.2.2 Compression

Files transmitted via FTP, SFTP or IFT may be compressed or uncompressed. If compressed, the following rules apply:

- 1. OSOs must use the GNU gzip compression protocol.
- 2. Compressed files must have a .gz file extension.
- 3. OSOs must transmit compressed files in binary mode.
- 4. A compressed file can only contain a single file (i.e. grouping of multiple files is not supported).
- 5. The root of the file name must be the same as the original uncompressed file.
- 6. The uncompressed files size must not exceed 25MB; however, there is no specific limit on the number of ROEs that can be in a single file.

3.2.3 OATS Addresses

Table 3-3. displays the addresses to use to access the OATS test and production environments via each access method.

Table 3-3. OATS Addresses

Access Type	Test	Production
Web via Internet	https://firmstest.finra.org	https://firms.finra.org
FTP – CENTURYLINK	oatstest-ftp.finra.org	oats-ftp.finra.org
IFT	iftcert.finra.org	ift.finra.org
SFTP	oatstest-sftp.finra.org	oats-sftp.finra.org

When communicating with OATS via FTP or SFTP, OSOs should use the DNS names listed in Table 3-3. OATS Addresses, rather than physical IP addresses, because OATS will be using multiple servers and round-robin DNS to perform load balancing.

3.3 Accessing OATS Information

3.3.1 OATS Feedback

Feedback items include information conveyed from OATS to the OSOs. OATS provides feedback by multiple mechanisms; however, some feedback items are only available via a single mechanism. The paragraphs below discuss each of the feedback items and the access mechanisms available for each item. (See Section 6—Feedback and Corrections.) NOTE: All information obtained via FTP, SFTP, or IFT must be "pulled" from OATS. OATS will not "push" any information to member firms via FTP, SFTP or IFT. Information related to obtaining feedback from the *OATS Web Interface User Guide* is available at www.finra.org/oats/webuserguide.

- **FORE Status**—FORE Status can be obtained via the same mechanism that was used to submit the FORE, and is also displayed on the Web interface. If the FORE were submitted via FTP, SFTP or IFT, FORE Status can be retrieved from the OATS FTP and IFT servers. In all cases, FORE Status can be viewed on the Web interface.
- ROE Rejections— Reportable Order Event records (ROEs) that failed validation checks. ROE rejections can be viewed and interactively repaired via the Web interface. Repaired ROE rejections can also be submitted by regenerating the ROEs and submitting them in a new FORE. (Repaired ROE rejections can be commingled with new ROEs.) A daily file or files of rejections is available for download via the FTP, SFTP, IFT, and the Web interface.
 - NOTE: To meet the requirements of data retention, firms that correct ROEs via the Web interface must also maintain the repaired version of all ROEs.
- **Reporting Statistics**—Available via the OATS Web interface, Reporting Statistics include daily summary statistics of reporting activity. Reporting Statistics are available on a daily basis, and are posted when processing for all files has completed.
- Out of Sequence Events— Subsequent events reported to OATS with an event timestamp prior to the Order Received timestamp of the originating event. Out of Sequence Events may be viewed or downloaded via the Web Interface.
- Unmatched Execution Reports— Match eligible Execution Reports that do not link with trades reported to a FINRA transaction reporting system. A daily file or files of unmatched execution reports is available via FTP, SFTP, IFT, and the Web interface. More information about the conditions causing order data to be considered unmatched is in Chapter 6.
- Unmatched Exchange Route Reports— Match eligible Route Reports that do not link with orders submitted to a national securities exchange. A daily file or files of unmatched Exchange route reports is available via FTP, SFTP, IFT, and the Web interface. Unmatched Route and Combined Order/Route Reports may be viewed or downloaded via the Web Interface.

- Unmatched Interfirm Route Report Orders Routed and Order Received—
 Match eligible Route Reports that do not link to a corresponding New,
 Cancel/Replace, Combined Order/Execution or Combined Order/Route Report.
 A daily file or files of unmatched interfirm route reports is available via FTP,
 SFTP, IFT, and the Web Interface. Orders Received are only available via the
 OATS Web Interface.
- Unlinked Trade Reports Link eligible Trade Reports reported to a FINRA transaction reporting system that do not reverse link with Execution Reports. Unlinked Trade Reports may be viewed or downloaded via the Web Interface.
- Unlinked Exchange Orders Link eligible Exchange Orders that do not reverse link with Routing Events. Unlinked Exchange Orders may be viewed or downloaded via the Web Interface.
- Unlinked Interfirm New Orders Link eligible OATS New Orders that do not reverse link with Routing Events. Unlinked New Orders may be viewed or downloaded via the Web Interface.

3.3.2 OATS Administrative Information

Administrative information items include all miscellaneous items, such as announcements and account maintenance.

- Web Announcements—this information is available only via the Web interface. The user will be notified of the last time the announcements have been modified and offered an option to view the contents. These announcements are used to post information related to the operation of OATS, including the current versions of Web browser and encryption software that are compatible with OATS.
- FTP/SFTP/IFT Announcements—this information is available via FTP, SFTP and IFT. FTP/SFTP/IFT users will receive OATS Announcements in a text file located in a folder titled "message". Refer to Figure 3-3. Figure and 3-5. for Information Flow.
- Account Management—this information is available only via the OATS Web Interface. OSOs will perform their own account management. An OATS Account Administrator is able to update contact information and request that users or passwords be changed, added, or deleted. Additional details about Account Management are available in the OATS Registration and User Entitlement Guide and the OATS Web Interface User Guide, both available at www.finra.org/oats.

3.4 Security

Submissions to FINRA require a valid user ID and password. OSOs must obtain a master user ID and password combination during registration via an OATS Administrator (see Section 3.6). OSO Administrators may request additional user IDs and passwords, as necessary, for their firms. Firms are also required to designate OSO's who will transmit on their behalf.

3.4.1 FTP

The following security rules apply for the FTP access method:

- 1. OSOs are required to log on to FINRA's secure file transfer gateway using a supplied user ID and password that corresponds with the User account type.
- 2. An OSO is only required to log on a single time per session, even if FOREs for several firms will be transmitted during that session.
- 3. Files sent via FTP are NOT encrypted and can only be sent via the OATS/CENTURYLINK network.
- 4. Since the user ID and password are provided at log on, they are not required to be part of the FORE header when transmitting files.
- 5. An OSO that transmits files for several MPIDs must submit a separate FORE for each MPID.
- 6. Each FORE file must have a unique name so that all firms may access their respective files and record status information. OATS will not test for unique external file names on submission.
- 7. FORE files sent to OATS may not have filename extensions of .*status*, .*reject*, or .*umtch* and may not contain colons or spaces.
- 8. When multiple FOREs are sent in a single file, OATS treats each header/trailer combination as a separate submission. NOTE: Multiple order event types may be represented in a single FORE. A separate FORE must be submitted for each firm that is subject to OATS reporting; multiple FOREs can be combined in a single file.

3.4.2 SFTP

The following security rules apply for the SFTP access method:

- 1. OSOs are required to log on to FINRA's secure file transfer gateway using a supplied user ID and password that corresponds with the User account type.
- 2. An OSO is only required to log on a single time per session, even if FOREs for several firms will be transmitted during that session.
- 3. Files sent via SFTP are encrypted and can be sent via the OATS/CENTURYLINK network or the Internet.
- 4. To utilize SFTP via the public internet, OSOs must contact FINRA Technical Support to associate the OSO's static IP address with FINRA's firewall. NOTE. OSOs must allow for a thirty day period for the firewall and network setup to be put in place.
- 5. Since the user ID and password are provided at log on, they are not required to be part of the FORE header when transmitting files.
- 6. An OSO that transmits files for several MPIDs must submit a separate FORE for each MPID.

- 7. Each FORE file must have a unique name so that all firms may access their respective files and record status information. OATS will not test for unique external file names on submission.
- 8. FORE files sent to OATS may not have filename extensions of .*status*, .*reject*, or .*umtch* and may not contain colons or spaces.
- 9. When multiple FOREs are sent in a single file, OATS treats each header/trailer combination as a separate submission. NOTE: Multiple order event types may be represented in a single FORE. A separate FORE must be submitted for each firm that is subject to OATS reporting; multiple FOREs can be combined in a single file.

3.4.3 IFT

The following security rules apply the IFT access method:

- 1. OSOs transmitting via the internet must login using the OATS user ID and password that corresponds with the User account type.
- 2. OSO transmitting using the SecureTransport™ client must set up the software profile to use the OATS user ID and password that corresponds with the IFT User.
- 3. Files sent via IFT are NOT encrypted and can be sent via the SecureTransportTM client software or uploaded manually via the Internet.
- 4. An OSO is required to select the files that will be transmitted during that session.
- 5. Since the user ID and password are provided at log on, they are not required to be part of the FORE header when transmitting files.
- 6. An OSO that transmits files for several MPIDs must submit a separate FORE for each MPID.
- 7. Each FORE file must have a unique name so that all firms may access their respective files and record status information. OATS will not test for unique external file names on submission.
- 8. FORE files sent to OATS may not have filename extensions of .status, .reject, or .umtch and may not contain colons or spaces.
- 9. When multiple FOREs are sent in a single file, OATS treats each header/trailer combination as a separate submission. NOTE: Multiple order event types may be represented in a single FORE. A separate FORE must be submitted for each firm that is subject to OATS reporting; multiple FOREs can be combined in a single file.

3.4.4 Web Interface

The OATS Web interface uses SSL encryption with server-side certificates obtained from Verisign, Inc. The formats and Web page designs are described in the *OATS Web Interface User Guide*. These pages allow OSOs to view announcements and file status information, submit new and corrected ROEs, view and repair ROE rejections, access

OSO or firm statistics, request changes in user passwords, and perform self-administration.

The following security rules apply for the Web Interface:

- 1. An OSO that transmits files for several other firms is allowed to view all information that it has submitted.
- 2. Member firms utilizing another firm for submission are only allowed to view information pertaining to their own firm.
- 3. Firms submitting their own information have access to all their own information.

3.5 Data Flow Examples

The below diagrams present typical exchanges of OATS information between an OSO and FINRA using the FTP, SFTP and IFT transmission methods. In each example, files contain one or more FOREs (header/trailer pairs), and ROE rejections are repaired using the Web interface.

In the examples, Step 1 depicts an OSO preparing and submitting a FORE file (which may include multiple FOREs); Step 2 shows FINRA receipt and processing of each FORE's envelope (header and trailer) and generation of a file status message; Step 3 involves examination of the file status message and possible retransmission by the OSO; Step 4 illustrates additional processing of each ROE in the submission, with the possible generation of ROE rejections; and Step 5 demonstrates the OSO retrieving, repairing, and resubmitting the rejected ROEs. (Details regarding the preparation of the files is contained in Section 5 and Appendix C of this document.)

OSO **FINRA** At end of day or at time At time chosen by chosen by OSO FINRA (Before 8AM) (a) Connect information on Order Events Package into FORE file Generate announcement Post YYYYMMDDHH24MISS.message Connect to Secure File Transfer Gateway (SFTG) Logon with <userid>/<password> put <filename> If rejected, correct error(s) Receive file (2) Examine the submission Generate status for each FORE in the file and resubmit Post as filename.status-n Connect to SFTG server (3) Logon with <userid>/<password> bin od status For single FORE submissions: get filename.status (Within 1 hour) For multiple FORE submissions: get filename.status-n or mget Connect to SFTG server (5) Logon with <userid>/<password> Process ROEs in the file for Syntax and bin 4 Semantics cd rejects (Syntax/Semantics Rejections available within 4 hours of receipt of an accepted FORE status Generate ROE rejections (if any) get Syntax_<FirmFOREID>_<FOREGene rationDate>_YYYYMMDD-n.reject or message) Connect to SFTG server (7)Process ROEs in the file for Context and Logon with <userid>/<password> (6) Duplicates Generate ROE rejections (if any) get Context_YYYYMMDD-n.reject or mget * (Context/Duplicate Rejections available within 24 hours after the Generate Unmatched data (if any) OATS Reporting deadline) Connect to SFTG server (8) Logon with <userid>/<password> cd unmatched get Execution_YYYYMMDD-n.umtch or get Route_YYYYMMDD-n.umtch or get Interfirm_YYYYMMDD-n.umtch or (Unmatched data available within 1 business day of processing date) Connect to SFTG server (b) Logon with <userid>/<password> cd messge mget YYYYMMDD*

Figure 3-3. Typical OATS Information Flow Via FTP or SFTP

OSO **FINRA** At end of day or at time At time chosen by chosen by OSO FINRA (Before 8AM) (a Generate announcement Post YYYYMMDDHH24MISS.message Collect information on order events Package into FORE file Connect to FINRA via Secure Transport client software Transmit files using client software Receive file (2) If rejected, correct error(s) Examine the submission Generate status for each FORE in the file and resubmit Post as filename.status-n Connect to FINRA via Secure Transport client software Download status from status folder (Within 1 hour) Process ROEs in the file for Syntax and (5 Connect to FINRA via Secure Semantics Generate ROE rejections (if any) Transport client software (Syntax/Semantics Rejections available within 4 hours of receipt Download rejections from rejects folder Post as 4 Syntax <FirmFOREID> <FOREGenerati of an accepted FORE status onDate>_YYYYMMDD-n.reject Process ROEs in the file for Context and 6 Duplicates Generate ROE rejections (if any) Connect to FINRA via Secure Transport Generate Unmatched data (if any) Post as the following client software Context_YYYYMMDD-n.reject or Execution_YYYYMMDD-n.umtch or Route_YYYYMMDD-n.umtch or Download rejections from rejects folder (Context/Duplicate Rejections available within 24 hours after the OATS Reporting deadline) Interfirm_YYYYMMDD-n.umtch Connect to FINRA via Secure Transport client software Download unmatced data from (Unmatched data available within unmatched folder business day of processing date) b Connect to FINRA via Secure Transport client software Download messages from Message folder

Figure 3-4. Typical OATS Information Flow Via IFT

3.6 Registration Process

All FINRA, The NASDAQ Stock Market, NASDAQ OMX BX, NASDAQ OMX PHLX, New York Stock Exchange, NYSE Arca, NYSE MKT, and Investors Exchange members that meet the definition of a Reporting Member pursuant to FINRA, NASDAQ or NYSE OATS Rules and receive and/or handle orders for OATS reportable securities must register for OATS. Non-member entities acting as a third party to transmit OATS order information on behalf of a member firm must also register for OATS.

On September 28, 2005 the SEC approved amendments to the OATS Rules (see Notice to Members 05-78). These amendments contain a provision that permits FINRA to grant exemptive relief from the OATS reporting requirements for manual orders in certain circumstances. To learn more about the requirements for exemptive relief and to apply for exemption, contact Business Support.

For additional information about Registration and OATS reporting, refer to FINRA Rules 7400 through 7470 and Notice to Members 98-33, 98-73, and 99-4. Information about OATS is also available via the FINRA Web Site at http://www.finra.org/oats.

The OATS Registration and User Entitlement Guide, www.finra.org/oats/registration provides all of necessary information to:

- o Register with OATS
- o Create OATS Users
- o Manage User Accounts

Member Firms with an OATS reporting requirement that fail to perform all required registration activities will not be able to report OATS data; failure to report order information may be a violation of FINRA or NASDAQ OATS Rules.

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4. Order Reporting

The objective of this section is to describe the OATS reporting responsibilities of member firms. It provides an overview of order reporting, describes each order report, and provides a representative sample of order reporting scenarios.

4.1 Overview

Orders subject to OATS reporting are defined as any oral, written, or electronic instruction to effect a transaction in a NMS stock or an OTC equity security that is received by a member from another person for handling or execution, or that is originated by a department or a member for execution by the same or another member, other than any such instruction to effect a proprietary transaction originated by a Trading Desk in the ordinary course of a member's market making activities.

As the definition suggests, members are not required to report orders originated by the Trading Desk in the normal course of market making activity. However, all other proprietary orders originated by a member are reportable. Additionally, OATS rules require members to report every order received for an OATS reportable security, even if the order is received from a market maker in the security.

Orders in foreign equity securities are required to be reported only in those instances where the resulting execution is subject to the transaction reporting requirements in FINRA Rule 6622. The requirements of FINRA Rule 6622 do not apply to transactions in foreign equity securities provided that: 1) the transaction is executed on and reported to a foreign securities exchange; or 2) the transaction is executed over the counter in a foreign country and is reported to the regulator of securities markets of that country.

Orders received by Alternative Trading Systems ("ATSs") in NMS stocks require additional information with those submissions as per FINRA Rule 4554.

4.2 Event Types

The mission of OATS is to establish and maintain the complete life cycle of an order. To achieve this, OATS must be able to uniquely identify an order, track any modifications or cancellations to the order, track its movement from firm to firm or to a national securities exchange, and link the order to a trade if reported to a FINRA transaction reporting system. To achieve this, firms must record and report each event in the life cycle of an order.

4.2.1 Order Receipt or Origination

When a FINRA member originates or receives an order in an OATS reportable security, the member is required to record and report certain information to OATS regarding that order including:

• **Firm Order Identifier** - an order identifier that uniquely identifies the order for the firm within the order received date.

- **Time of Receipt** the date and time the firm originates or receives the order from the customer. The time that the member records as the time of receipt for purposes of satisfying SEC Rule 17a-3(a)(6) is the time the firm should record as the OATS order receipt time. The order receipt time required to be recorded pursuant to SEC Rule 17a-3(a)(6) will always be the time of receipt for OATS reporting purposes.
- Order Origination Code identifies whether the order was received from a customer of the firm, originated by the firm, or whether the order was received from another broker/dealer.
- **Account Type** identifies the type of beneficial owner of the account for which the order was received or originated.
- **Receiving or Originating Department** the identification of the department where the order was received or originated.
- Special Handling special handling instructions associated with the receipt of the order.

Additionally, if an order is received from another FINRA member, the following must also be recorded and reported to OATS:

- **Routed Order ID** For orders received electronically, the Routed Order ID received from the routing firm must be provided.
- **Routing Firm MPID** For orders received from a FINRA member, the Routing Firm's MPID must be provided. For orders received from a reportable non-member, the Routing Firm's SRO-assigned identifier or CRD number must be provided.

If an order is received by an ATS in a NMS stock, the ATS must record additional information including:

- **ATS Display Indicator** indicates whether the ATS displays orders outside the ATS either to subscribers only or via public quotation.
- NBBO Price the relevant reference price in effect at the time of order receipt
- NBBO Matching Engine Lookup Date and Time the date and time the relevant reference price was referenced upon receipt of the order
- **NBBO Source** the data feed used by the ATS to record the relevant reference price

4.2.2 Transmittal to a Desk or Department within a Firm

When a FINRA member originates or receives an order and then subsequently transmits that order to another desk or department within the firm, the member is required to record and report certain information to OATS regarding the intra-firm transmittal including:

• **Time of Receipt by the Desk or Department** - the date and time the order was received by the desk or department to which the order was transmitted.

- **Desk Type Code** the identification of the desk or department to which the order was transmitted. Types of desks include the agency desk, the sales desk, and the arbitrage desk. A Trading Desk is interpreted as a place or system within the firm where an order can be executed, either automatically or with the assistance of traders.
- **Special Handling** special handling instructions that are communicated by the receiving department to a desk or other department, such as "Not Held." It may be that the special handling codes associated with the original receipt of the order are different than the special handling codes associated with the intra-firm transmittal, if the receiving department attaches additional instructions on the order after receipt or origination.

Desk transmittal information is required for all subsequent stops of an order within a firm, including its transfer to a Trading Desk for execution.

4.2.3 Order Transmittal/Route to Member, Non-FINRA Member or National Securities Exchange

When a FINRA member receives and transmits an order to another broker/dealer, or national securities exchange for further handling or execution; then, for OATS purposes, the order has been routed. An order that is transferred between two valid MPIDs within the same firm is also considered routed. For all routed orders, the member is required to record and report certain information to OATS regarding the route including:

- Order Sent Timestamp the date and time the order was routed.
- **Destination Code** indicates if the order was routed to a member firm, non-member firm, ECN or national securities exchange.
- **Routing Method Code** the method by which the order was routed.

Routing information is required for all orders that are routed to another FINRA member, a non-FINRA member, or national securities exchange for further handling or execution. The information required depends on the destination of the order and the method by which the order was routed as per the following:

- Exchange Participant ID for orders routed to a national securities exchange, the firm identifier assigned by the exchange must be provided.
- **Routed Order ID** for orders routed electronically to another FINRA member, ECN, or national securities exchange, the Routed Order ID must be reported. The Routed Order ID must be unique, except in instances when the route has a special routing condition, as per the following:
 - For orders routed to another broker/dealer, the Routed Order ID must be unique for the MPID, Order Sent Date, Connection ID, and Sent to Firm MPID. OATS will attempt to match orders routed to another FINRA member or ECN using the Routed Order ID.
 - o For orders routed to a national securities exchange, the Routed Order ID must be unique for the MPID, Order Sent Date, Connection ID,

Destination Code, and Exchange Participant ID. OATS will attempt to match orders routed to a national securities exchange using the Routed Order ID, Exchange Participant ID, and Connection ID, if populated.

For orders routed manually, the Routed Order ID is not required.

- **Special Routing Condition** indicates if the order has a special routing condition that requires the duplication of the Routed Order ID:
 - O **Bunched** if the firm combines orders for further routing, such that the total shares quantity routed represents more than one order, the routing firm must indicate that the routed order was bunched. Each participating order of the bunch must be reported on a separate route report with the same Routed Order ID. For example, if two orders were bunched and routed to another firm, two route reports must be sent to OATS with the same Routed Order ID, each identifying the order as bunched. The Routed Shares Quantity must equal the total number of shares routed in the bunched order. NOTE: The Routed Order ID reported on the bunched routes may not be reused for any other orders for the MPID, the trading day, and Sent to Firm MPID (if routed to another member) or Destination Code and Exchange Participant ID (if routed to a national securities exchange).
 - Modification of an Exchange Order If the identified order has an exchange routing condition that requires the use of the original Order ID, then the routing firm must indicate that the route represents a modification to an order routed to a national securities exchange that includes a duplicated Routed Order ID.
- **Sent to Firm MPID** for orders routed to a FINRA member, the Sent to Firm MPID must be provided; For orders routed to a reportable non-FINRA member, the SRO-assigned identifier or CRD number must be provided.

Firms that transmit orders through non-member routing and trading systems are not considered, for OATS purposes, to be routing the orders to the non-member trading system; instead firms are considered to be routing the orders to the member or market center that is the order's destination. OATS does not require any new reports to be generated as orders are transmitted via or through non-member routing or trading systems. For example, if a non-market maker received an order from a customer for 1,000 shares of ORCL and transmitted that order through a non-member trading system to an ORCL market maker, only reports regarding the receipt and route by the non-market maker and the receipt and execution by the market maker should be submitted to OATS. If however, either firm received the order and has to transfer such order within the firm to a place or system where it could be executed, a Desk Report may also be required.

4.2.4 Order Modification

When a FINRA member receives a customer-initiated modification to an order, the member is required to record and report certain information to OATS regarding the modification, including:

- **Replaced Firm Order Identifier** the order identifier of the order that is being modified.
- **Time of Modification** the date and time the firm received the modification of the order from the customer. NOTE: this is not the time of any system acknowledgement or acceptance.
- **Firm Order Identifier** an order identifier that uniquely identifies the modified order for the firm within the order received date.

Order modification information is required for all customer modifications to an order, including changes to limit or stop prices, time in force, special handling codes, or an increase in quantity.

Order modification information should **not** be reported to OATS in the following circumstances:

- Changes to Side or Issue Symbol changes to the Buy/Sell code or Issue Symbol should result in the cancellation of an order and the origination of a new order.
- Modification of a Route—if a trader or trading software modifies a previously routed order, and not the customer, then the routing firm is not required to report a modification provided the destination to which the order was routed reports the modification. NOTE: if the order was modified by a trader or trading software after being routed to a non-member that has no OATS reporting obligations or a national securities exchange for which there is no electronic linkage in OATS, then the modification must be reported.
- Correcting an Error—firms that erroneously submit a report to OATS should correct the error by using a Correction Report which shows that the order remains live, but was corrected for OATS reporting purposes. In this instance, submitting modification information would be inappropriate since the customer has not modified the order.
- Reduction in Quantity Reductions in quantity should be reported as a partial cancellation.

4.2.5 Order Display Modification

For ATSs that display subscriber orders in NMS stocks, the ATS is required to record the changes to the displayed price or size of an order including:

- Time of Modification the date and time the display price or size changed
- **Display Price** the updated display price of the order
- **Display Size** the updated display size of the order

4.2.6 Order Execution

When a FINRA member originates or receives an order, and the firm subsequently executes the order, the member is required to record and report certain information to OATS regarding the execution including:

- **Time of Execution** the date and time of execution.
- **Execution Type** indicates if the execution is a full execution (entire share quantity is executed) or partial execution (a portion of the order that is less than the full share quantity is executed). For partial executions, the remaining leaves quantity must also be reported.
- **Market Center** identifies the facility operated by a registered securities association where the trade was reported.
- Capacity indicates the capacity the member acted in when executing the order (agency, principal, or riskless principal).

Execution information is required for all orders that are executed partially or in full. The information required depends on the market center to which the order was trade reported as per the following:

- OATS Trade ID for trades reported to a FINRA transaction reporting system,
 OATS requires the member to report an OATS Trade ID on the OATS Execution
 or Combined Order/Execution Report. OATS will attempt to match execution
 information to trades reported to a FINRA transaction reporting system using the
 OATS Trade ID.
- **Reporting Exception Code** in instances where no trade report is required pursuant to FINRA transaction reporting rules, firms may use a Reporting Exception Code to indicate there is no trade report related to the OATS Execution Report.

If an order is executed by an ATS in a NMS stock, the ATS must record additional information including:

- **NBBO Price** the relevant reference price in effect immediately prior to order execution
- NBBO Matching Engine Lookup Date and Time the date and time the relevant reference price was referenced immediately prior to execution
- **NBBO Source** the data feed used by the ATS to record the relevant reference price

4.2.7 Order Cancellation

When a FINRA member originates or receives an order and the firm or customer subsequently cancels the order, the member is required to record and report certain information to OATS regarding the cancellation, including:

- **Time of Cancellation** the date and time the customer instruction was originated or received by the firm. NOTE: This is not the time of any system acknowledgement or acceptance.
- Cancel Type indicates if the cancellation is a full cancel (entire share quantity is cancelled) or partial cancel (a portion of the order that is less than the full share quantity is cancelled). For partial cancellations, the remaining leaves quantity must also be reported.
- Cancelled By identifies if the order was cancelled by the customer or the firm. When a customer cancels an order that was routed externally, the firm that originally received the order must send a report of cancellation to OATS and communicate the cancellation to the firm to which the order was routed. Additionally, the receiving firm must also send a report of cancellation to OATS.

Cancel information is required for all orders that are modified during the course of the day and subsequently cancelled, or cancelled in full after the date of receipt. If a request for modification cannot be honored because the order has been executed, a report of cancellation may be submitted to reflect the customer's instructions, but is not required.

Cancel information should not be reported to OATS in the following circumstances:

- **Expired Limit Orders**—when a limit order expires, the cancellation of the order is not necessary. FINRA is able to determine that the order has expired based on the time in force as reported by the firm.
- Cancellation of a Route—firms should not submit cancel information to OATS that reflects the cancellation of a route to another firm.
 - o If a firm cancels the routing of an order to another firm, then the routing firm should notify the receiving firm of the cancellation. Only the receiving firm should submit cancel information to OATS. The routing firm should not submit cancel information to OATS.
 - If a firm cancels the routing of an order to a national securities exchange, the firm should not submit cancel information to OATS since the cancel would be reflected by the exchange.
- Correcting an Error—Firms that erroneously submit a report to OATS should
 correct the error by using a Correction Report which shows that the order remains
 live, but was corrected for OATS reporting purposes. In this instance, submitting
 cancel information would be inappropriate since the customer has not cancelled
 the order.

4.3 Order Report Types

To facilitate the reporting of order events, OATS has defined Order Reports that include various combinations of order event information. OATS uses the event information contained on each report to build the lifecycle of every order.

Table 4-1 lists the Order Reports defined in OATS and the event types that may be reported using each report.

Table 4-1. Summary of OATS Order Reports

Order Report Type	Event Type	Report Description	OATS Rule
New Order Report ¹	Order Receipt or Origination	Records the receipt of an order from a customer, another member or non-member, or orders originated within a member firm.	7440(b) 4554(b), 4554(d)
	Transmittal to a Desk or Department Within a Firm	Records the full transmittal of an order to a desk or department within a member firm on the same day.	7440(c)
	Order Cancellation	Records the cancellation of the order when the order is received and fully cancelled on the same day.	7440(d)
Route Report	Order Transmittal/Route to Another Member/ECN, Non- Member or National Securities Exchange	Records the routing of an order to another member, ECN, non-member or national securities exchange.	7440(c)
Desk Report	Transmittal to a Desk or Department Within a Firm	Records the receipt of a full or partial transmittal to a desk or department within a member firm.	7440(c)
Execution Report	Order Execution	Records the full or partial execution of an order.	7440(d), 4554(c)
Cancel Report	Order Cancellation	Records the full or partial cancellation of an order.	7440(d)
Cancel/Replace Report	Order Modification	Records the modification of an order.	7440(d), 4554(b). 4554(d)
Combined Order/Execution Report ²	Order Receipt or Origination and Order Execution	Records the receipt of an order from a customer, another member or non-member, or orders originated within a member firm and full execution on the same day.	7440(b), 7440(d), 4554(b), 4554(c), 4554(d)
	Transmittal to a Desk or Department Within a Firm	Records the full transmittal of an order to a desk or department within a member firm on the same day.	7440(c)
Combined Order/Route Report ³	Order Receipt or Origination and Order Transmittal/Route to Another Member/ECN, Non- Member or National Securities Exchange	Records the receipt of an order from a customer, another member or non-member, or an order originated within a member firm and full route of the order on the same day to another member, ECN, non-member or national securities exchange.	7440(b), 7440(c), 4554(b), 4554(d)
	Transmittal to a Desk or Department Within a Firm	Records the full transmittal of an order to a desk or department within a member firm on the same day.	7440(c)
	Order Cancellation	Records the cancellation of the order when the order is received and fully cancelled on the same day.	7440(d)

 $^{^{1}\}mbox{The New Order Report includes fields for cancellation and desk information.}$

²The Combined Order/Execution Report includes fields for desk information.

³The Combined Order/Route Report includes fields for cancellation and desk information.

Order Display	Applicable only for ATSs that display 4554(e)
Modification Report	subscriber orders in NMS stocks, records
	the modification of the display price or
	size of a subscriber order.

During processing, OATS uses the **Order Identifier** to uniquely identify orders. The Order Identifier is comprised of the following fields:

- Firm Order Identifier an order identifier assigned by the firm
- Order Received Date a timestamp that represents the date and time of receipt.
- Market Participant Identifier (MPID)

The Order Identifier is used to link order events within a firm, and is the first step to creating the lifecycle of an order.

4.3.1 New Order Report

The New Order Report is used to record the receipt of an order from a customer, another broker/dealer, or orders originated within the firm. The New Order Report may also be used to record and report the following additional information:

- The transmittal of an order in full to a desk or department within a firm on the same day as the order originated.
- The full cancellation of an order that was received and fully cancelled on the same day.

4.3.2 Route Report

The Route Report is used to record full, partial or bunched routing of an order to another FINRA member firm, non-FINRA member or national securities exchange. In order to link Route Reports to the originating event reported to OATS, the unique order identifier of the originating order must be included.

4.3.3 Desk Report

The Desk Report is used to record the transmittal of an order to a desk or department within a firm. In order to link Desk Reports to the originating event reported to OATS, the unique order identifier of the originating order must be included.

4.3.4 Cancel Report

The Cancel Report is used to record the full or partial cancellation of an order. In order to link Cancel Reports to the originating event reported to OATS, the unique order identifier of the originating order must be included.

4.3.5 Cancel/Replace Report

The Cancel/Replace Report is used to record the customer-initiated modification of an order. In order to link Cancel/Replace Reports to the originating event reported to OATS, the unique order identifier of the order being replaced must be included.

4.3.6 Combined Order/Execution Report

The Combined Order/Execution Report is used to record the receipt of an order from a customer, another member or non-member, or orders originated within a member firm,

and full execution on the same day. The Combined Order/Execution Report may also be used to record and report the following additional information:

• The transmittal of an order in full to a desk or department within a firm on the same day the order originated.

4.3.7 Combined Order/Route Report

The Combined Order/Route Report is used to record the receipt of an order from a customer, another broker/dealer, or orders originated within a member firm, and full route of the order on the same day. The Combined Order/Route Report may also be used to record and report the following additional information:

- The transmittal of an order in full to a desk or department within a firm on the same day as the order originated.
- The full cancellation of an order that was received and fully cancelled on the same day.

4.3.8 Order Display Modification Report

The Order Display Modification Report is used to record a change in the displayed price or size of a subscriber order in a NMS stock . In order to link Order Modification Reports to the originating event reported to OATS, the unique order identifier of the originating order must be included.

NOTE: Each Order Report is fully defined in Appendix C, including the data type and size, allowable values, and conditions when the field is mandatory. All fields contained in each Order Report are fully defined in Appendix A.

4.4 Order Reporting Scenarios

This section provides a representative sample of order reporting scenarios in the equity trading environment. It defines and illustrates representative scenarios and their reporting requirements. Each reporting scenario includes a description, diagram, key points and assumptions, and example order report types representing the key data elements of each event type that must be recorded and reported to OATS in response to the scenario.

4.4.1 Order Execution

This scenario illustrates the reporting requirements to OATS of a member firm that fills a customer order from its proprietary account. In this scenario, the member firm is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The execution of the order.

Furthermore, this scenario illustrates the following details:

- 1. The member firm is required to send a Combined Order/Execution Report for the order it receives from the customer.
- 2. When reporting to a FINRA transaction reporting system, firms are required to submit a unique identifier (e.g., Branch Sequence Number, Compliance ID) for the purpose of matching to the related OATS Execution Report. The firm must also submit this unique identifier as the OATS Trade ID on the Combined Order/Execution Report. The unique identifier is used to match the trade report to the related OATS Execution or Combined Order/Execution Report.

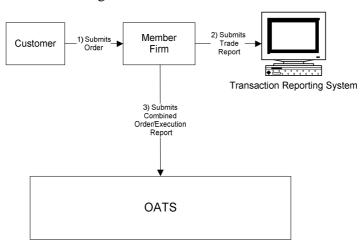


Figure 4-1. Order Execution

- 1. The order was received directly by the desk/department that handled the order.
- 2. The member firm received and fully executed the order in one trade on the same day; otherwise, separate New Order and Execution Reports must be used.
- 3. The order is executed on a principal basis.
- 4. The trade is reported to the FINRA/NASDAQ Trade Reporting Facility.

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Table 4-2. Order Execution, Event Listing

Ref	Event	Event Details	
1	Member Firm receives order from customer.	Market sell order for 2,000 shares of O	
2	Member Firm fills order internally and reports the	Member Firm fills order for 2,000 shar	
	trade to the FINRA/NASDAQ Trade Reporting	a trade report to the FINRA/NASDA	.Q Trade Reporting
	Facility.	Facility which includes the Branch So	equence Number
		ABC123.	
3	Member Firm submits Combined	Combined Order/Execution sample da	
	Order/Execution Report to OATS.	Order Receiving Firm MPID:	FIRM
		Order Received Date:	20101231000000000
		Order Receiving Firm Order ID:	ABC123
		Order Received Timestamp:	20101231105436721
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	2000
		Receiving Department ID:	T
		Originating Department ID:	
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	
		Execution Timestamp:	20101231105812432
		OATS Trade ID:	ABC123
		Execution Quantity:	2000
		Trader Terminal ID:	TERM00392
		Market Center ID:	L
		Execution Price:	31.00
		Capacity Code:	P

4.4.2 Execution of Orders Matched as Agent by a Member (Including ATS or ECN)

This scenario illustrates the reporting requirements to OATS when a member firm, as agent, matches a buy order and sell order at the same price. In this scenario, Member Firm 3 matches an order from Member Firm 1 with an order from Member Firm 2 for execution. In this scenario, Member Firm 1 is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The route of the order to Member Firm 3.

Member Firm 2 is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The route of the order to Member Firm 3.

Member Firm 3 is required to report the following events to OATS:

- 1. The receipt of the orders from the member firms.
- 2. The execution of each order received.

Furthermore, this scenario illustrates the following details:

- Member Firm 3 is required to capture the Firm MPID and the Routed Order ID of both member firms and report this information on each New Order Report to OATS.
- 2. The execution reports for each order must contain a unique OATS Trade ID. Each respective OATS Trade ID must also be included as the unique identifier (e.g., Branch Sequence Number, Compliance ID) on the applicable side of the transaction report submitted to a FINRA transaction reporting system.

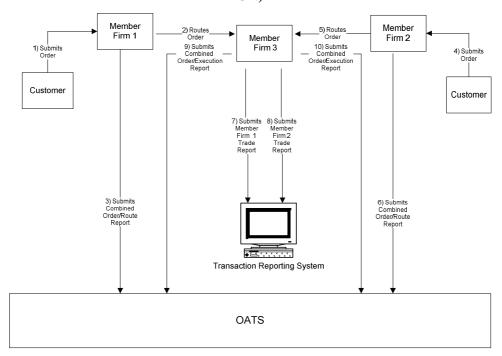


Figure 4-2. Execution of Orders Matched as Agent by a Member (Including ATS or ECN)

- 1. The order was received directly by the desk/department that handled the order.
- 2. Member Firm 1 and Member Firm 2 both received and fully routed the order to Member Firm 3 on the same day; otherwise, separate New Order and Route Reports must be used.
- 3. Member Firm 3 received and fully executed the order in one trade on the same day; otherwise, separate New Order and Execution Reports must be used.
- 4. Member Firm 1 and Member Firm 2's customer orders were routed on an agency basis.
- 5. The trades are reported to the FINRA/NASDAQ Trade Reporting Facility.

Table 4-3. Execution of Orders Matched as Agent by a Member (Including ATS or ECN), Event Listing

Ref	Event	Event Details	
1	Member Firm 1 receives order from customer.	Market sell order for 2,000 shares of ORCL.	
2	Member Firm 1 routes order to Member Firm 3.	Market sell order for 2,000 shares of	ORCL.
2 3	Member Firm 1 routes order to Member Firm 3. Member Firm 1 submits Combined Order/Route Report to OATS.	Combined Order/Route Report samp Order Receiving Firm MPID: Order Received Date: Order Received Timestamp: Received Timestamp: Received Method Code: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Receiving Department ID: Originating Department ID: Order Origination Code: Account Type Code: Member Type Code: ATS Display Indicator: Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Routed Order ID:	le data includes: FRM1 20100103105855999 FRM1ABC123 20100103105855999 E ORCL SL 2000 A F I N FRM3 FRM1ABC123
4	Mambar Eign 2 receives and at from systematic	Order Sent Timestamp: Routed Shares Quantity: Routing Method Code: Special Routing Condition: Destination Code: Market have order for 2 000 shares of	20100103110014356 2000 E
5	Member Firm 2 receives order from customer. Member Firm 2 routes order to Member Firm 3.	Market buy order for 2,000 shares of	
6	Member Firm 2 submits Combined Order/Route	Market buy order for 2,000 shares of Combined Order/Route Report samp	
	Report to OATS.	Order Receiving Firm MPID: Order Received Date: Order Received Timestamp: Received Method Code: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Receiving Department ID: Originating Department ID: Order Origination Code: Account Type Code: Member Type Code: ATS Display Indicator: Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Routed Order ID: Order Sent Timestamp: Routed Shares Quantity: Routing Method Code: Special Routing Condition:	FRM2 20100103110015324 FRM2ABC123 20100103110015324 E ORCL B 2000 A F I N FRM3 FRM2ABC123 20100103110021457 2000 E
7	Member Firm 3 executes the sell order and submits a trade report to the FINRA/NASDAQ	Destination Code: Trade report includes the Branch Seq DEF456.	E juence Number

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Ref	Event	Event Details	
	Trade Reporting Facility.		
8	Member Firm 3 executes the buy order and submits a trade report to the FINRA/NASDAQ Trade Reporting Facility.	Trade report includes the Branch Sequence Number JKL123.	
9	Member Firm 3 submits Combined Order/Execution Report to OATS.	Combined Order/Execution Report solution order Receiving Firm MPID: Order Receiving Firm Order ID: Routing Firm MPID: Routed Order ID: Order Received Timestamp: Received Method Code: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Receiving Department ID: Originating Department ID: Order Origination Code: Account Type Code: Member Type Code: ATS Display Indicator: Desk Timestamp: Desk Type Code: Execution Timestamp: OATS Trade ID: Execution Quantity: Trader Terminal ID:	FRM3 20100103110015324 DEF456 FRM1 FRM1ABC123 20100103110015324 E ORCL SL 2000 ATS W I M 20100103110302115 DEF456 2000
		Market Center ID: Execution Price: Capacity Code:	TERM1 L 31.00 A
10	Member Firm 3 submits Combined Order/Execution Report to OATS.	Combined Order/Execution Report solution order Receiving Firm MPID: Order Receiving Firm MPID: Routing Firm MPID: Routed Order ID: Routed Order ID: Order Received Timestamp: Received Method Code: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Receiving Department ID: Originating Department ID: Order Origination Code: Account Type Code: Member Type Code: ATS Display Indicator: Desk Timestamp: Desk Type Code: Execution Timestamp: OATS Trade ID: Execution Quantity: Trader Terminal ID: Market Center ID: Execution Price: Capacity Code:	

4.4.3 Negotiated Execution between two FINRA Member Firms

This scenario illustrates the OATS reporting requirements when a FINRA member firm executes a customer order as a result of negotiating a trade with another FINRA member firm. In this scenario, Member Firm 1 (initiator) is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The execution of the order.

Member Firm 2 (respondent) is required to report the following to OATS:

 The second member (respondent) is required to send a Combined Order/Execution Report for the negotiated transaction with a Negotiated Trade Flag of 'Y' and an Execution Timestamp with the time the negotiation was completed.

When reporting to a FINRA transaction reporting system, firms are required to submit a unique identifier. Both firms must submit the unique identifier (e.g., Branch Sequence Number, Compliance ID) as the OATS Trade ID on the Combined Order/Execution Report or Execution Report. The OATS Trade ID is used to match the trade report to the related OATS Execution or Combined Order/Execution Report.

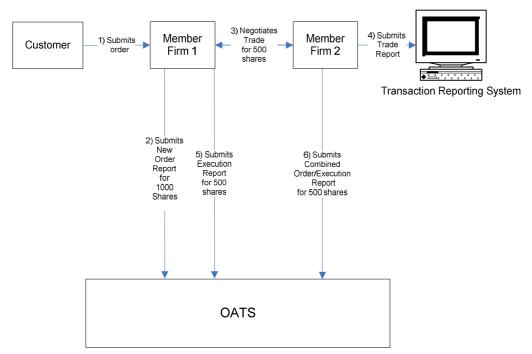


Figure 4-3. Negotiated Execution between two FINRA Member Firms

- 1. The order was received directly by the desk/department that handled the order.
- 2. The first member is acting as agent on behalf of its customer. The second member executes the trade as principal.
- 3. The trade is reported to the OTC Reporting Facility.

Table 4-4. Negotiated Execution between two FINRA Member Firms, Event Listing

Ref	Event	Event Deta	ils
1	Member Firm 1 receives order from	Market buy order for 1,000 shares	of AIMM.
	customer.		
2	Member Firm 1 submits a New Order Report to OATS.	New Order Report sample data incl	udes:
		Order Receiving Firm MPID:	FRM1
		Order Received Date:	20080102000000000
		Order Receiving Firm Order ID:	ABC123
		Order Received Timestamp:	20080102102355999
		Received Method Code:	E
		Issue Symbol ID:	AIMM
		Buy/Sell Code:	В
		Shares Quantity:	1000
		Receiving Department ID:	T
		Originating Department ID:	
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	A DCD5679
2	Heim OTC Link and the OTC	Routed Order ID:	ABCD5678
3	Using OTC Link operated by OTC	Member Firm 1 and Member Firm trade of AIMM. Member Firm 1 and	
	Markets, Member Firm 1 negotiates a trade of 500 shares with Member Firm 2.		
	trade of 500 snares with Member Firm 2.	an OTC Link Execution Message b	ack with an Execution ID
4	Member Firm 2 submits a trade to the	of ABC123.	ha OTC Danastina
4			
	OTC Reporting Facility Report.	Facility and populates the unique identifier used to link to the related OATS Execution Report with DEF123 for the	
		executing side and ABC123 for the	
5	Member Firm 1 submits an Execution	Execution sample data includes:	contra side.
3	Report to OATS.	Order Receiving Firm MPID:	FRM1
	Report to OMIS.	Order Received Date:	20080102000000000
		Order Receiving Firm Order ID:	ABC123
		Issue Symbol ID:	AIMM
		Execution Timestamp:	20080102102800999
		OATS Trade ID:	ABC123
		Execution Quantity:	500
		Trader Terminal ID:	TERM00392
		Market Center ID:	0
		Execution Price:	31.00
		Capacity Code:	A
6	Member Firm 2 submits a Combined	Combined Order/Execution sample d	
	Order/Execution Report to OATS.	Order Receiving Firm MPID:	FRM2
		Order Received Date:	20080102000000000
		Order Receiving Firm Order ID:	JKL123
		Order Received Timestamp:	20080102102800999
		Received Method Code:	M
		Issue Symbol ID:	AIMM
		Buy/Sell Code:	SL
		Shares Quantity:	500
		Receiving Department ID:	T
		Originating Department ID:	***
		Order Origination Code:	W
		Account Type Code:	0 M
		Member Type Code:	M

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Routed Order ID:	
ATS Display Indicator:	
Desk Timestamp:	
Desk Type Code:	
Execution Timestamp:	20080102102800999
OATS Trade ID:	DEF123
Execution Quantity:	500
Trader Terminal ID:	TERM00392
Market Center ID:	O
Execution Price:	31.00
Capacity Code:	P
Negotiated Trade Flag:	Y

4.4.4 Desk Transmittal and Subsequent Execution

This scenario illustrates the reporting requirements to OATS when a branch office of a member firm receives a customer order and subsequently transmits the order to its Trading Desk where it is executed. In this scenario, the member firm would be required to report the following:

- 1. The receipt of the order from the customer.
- 2. Transmittal of the order to the Trading Desk.
- 3. The execution of the order by the member firm.

The order receipt time would be the time the branch office received the order from the customer.

Furthermore, in this scenario, when reporting to a FINRA transaction reporting system, the member firm is required to submit a unique identifier (e.g., Branch Sequence Number, Compliance ID) used for OATS matching purposes. The member firm will also submit this identifier to OATS as the OATS Trade ID on the Execution Report.

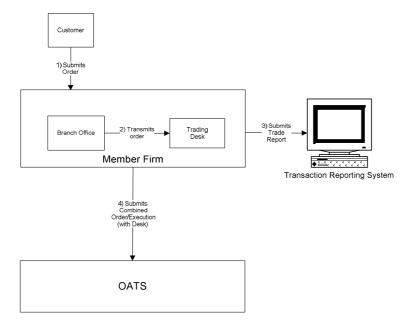


Figure 4-4. Desk Transmittal and Subsequent Execution

- 1. The order was received, transmitted to the Trading Desk and fully executed in one trade on the same day; otherwise, separate New Order, Desk, and Execution Reports must be used.
- 2. The order is executed on a principal basis.
- 3. The trade is reported to the FINRA/NASDAQ Trade Reporting Facility.

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Table 4-5. Desk Transmittal and Subsequent Execution, Event Listing

Ref	Event	Event Details	
1	Branch Office receives order from customer.	Market sell order for 2,000 shares of ORCL.	
2	Trading Desk receives order from the Branch	Trading Desk receives order and order is filled from the	
	Office.	proprietary account.	
3	Member Firm reports the trade to the	Trade report includes Branch Sequence Number of	
	FINRA/NASDAQ Trade Reporting Facility.	ABCD1234.	
4	Member Firm submits a Combined	Combined Order/Execution (with D	esk) Report sample
	Order/Execution (with Desk) Report to OATS.	data includes:	
		Order Receiving Firm MPID:	FIRM
		Order Received Date:	20101231000000000
		Order Receiving Firm Order ID:	ABCD1234
		Order Received Timestamp:	20101231101436721
		Received Method Code:	N
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	2000
		Trading Session Code:	REG:
		Receiving Department ID:	0
		Originating Department ID:	
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		ATS Display Indicator:	
		Desk Received Timestamp:	20101231102356346
		Desk Type Code:	T
		Execution Timestamp:	20101231103359987
		OATS Trade ID:	ABCD1234
		Execution Quantity:	2000
		Trader Terminal ID:	TERM00392
		Market Center ID:	L
		Execution Price:	31.00
		Capacity Code:	P

4.4.5 Partial Desk Transmittal and Subsequent Execution

This scenario illustrates the reporting requirements to OATS when a customer order is received by one desk/department (i.e. Sales) and is transmitted in pieces to another desk/department (i.e. Trading) within the same firm. In this scenario, the member firm is required to report the following events to OATS:

- 1. The receipt of the customer order by the Sales Desk.
- 2. The transmittal of each piece of the order to the Trading Desk.
- 3. The execution of the order by the Member Firm.

Furthermore, this scenario illustrates the following details:

When reporting to a FINRA transaction reporting system, the member firm is required to submit a unique identifier (e.g., Branch Sequence Number, Compliance ID) for the purpose of matching to the related OATS Execution Report. The member firm must also submit this unique identifier as the OATS Trade ID on the Combined Order/Execution Report. The unique identifier is used to match the trade report to the related OATS Execution or Combined Order/Execution Report.

Customer

1) Submits
2000 shares
Order

Parading
7) Transmits
Trading
7) Transmits
Trading
Pesk
Peport
Transaction Reporting System

Member Firm

1) Submits
New Order
Report
Report
For
1500 shares

1) Submits
Pesk
Report
Trading
1) Submits
Report
To for
1) Submits
New Order
1) Submits
New Order
1) Submits
10) S

Figure 4-5. Partial Desk Transmittal and Subsequent Execution

- 1. The order is executed on a principal basis.
- 2. The trades are reported to the FINRA/NYSE Trade Reporting Facility.

Table 4-6. Partial Desk Transmittal and Subsequent Execution, Event Listing

Ref	Event	Event Details	
1	Branch Office receives order from customer.	Market sell order for 2,000 shares of	
2	Member Firm submits a New Order Report to OATS.	New Order Report sample data inclu Order Receiving Firm MPID: Order Received Date: Order Receiving Firm Order ID: Order Received Timestamp: Received Method Code: Issue Symbol ID:	FIRM 20101231102355721 ABC123 20101231102355721 E ORCL
		Buy/Sell Code: Shares Quantity: Receiving Department ID: Originating Department ID: Order Origination Code: Account Type Code: Member Type Code: ATS Display Indicator: Desk Timestamp: Desk Type Code:	SL 2000 O F A N
3	Branch Office transmits order to Trading Desk.	Branch Office transmits 1,500 share Desk.	s to the Trading
4	Member Firm submits Desk Report to OATS.	Desk Report sample data includes: Order Receiving Firm MPID: Order Received Date: Order Receiving Firm Order ID: Desk Shares Quantity: Issue Symbol ID: Desk Type Code: Desk Received Timestamp:	FIRM 20101231102355721 ABC123 1500 ORCL T 20101231102356999
5	Member Firm executes order and reports the trade to the FINRA/NYSE Trade Reporting Facility.	Trade report includes Branch Sequence Number ABC123.	
6	Member Firm submits Execution Report to OATS.	Execution Report sample data included Order Receiving Firm MPID: Order Received Date: Order Receiving Firm Order ID: Execution Timestamp: OATS Trade ID: Execution Type Indicator: Execution Quantity: Trader Terminal ID: Issue Symbol ID: Market Center ID: Execution Price: Capacity Code:	FIRM 20101231102355721 ABC123 20101231102757999 ABC123 P 1500 TERM00392 ORCL DN 31.00 P
7	Branch Office transmits order to Trading Desk.	Branch Office transmits 500 shares	to the Trading Desk.
8	Member Firm submits Desk Report to OATS.	Desk Report sample data includes: Order Receiving Firm MPID: Order Received Date: Order Receiving Firm Order ID: Desk Shares Quantity: Issue Symbol ID: Desk Type Code: Desk Received Timestamp:	FIRM 20101231102355721 ABC123 500 ORCL T 20101231102358987
9	Member Firm executes order and submits a trade to the FINRA/NYSE Trade Reporting	Trade report includes Branch Seque ABC456.	nce Number

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	Facility.		
10	Member Firm submits Execution Report to	Execution Report sample data includes:	
	OATS.	Order Receiving Firm MPID:	FIRM
		Order Received Date:	20101231102355721
		Order Receiving Firm Order ID:	ABC123
		Execution Timestamp:	20101231102759999
		OATS Trade ID:	ABC456
		Execution Type Indicator:	P
		Execution Quantity:	500
		Trader Terminal ID:	TERM00392
		Issue Symbol ID:	ORCL
		Market Center ID:	DN
		Execution Price:	31.00
		Capacity Code:	P

4.4.6 Desk Transmittal to another Desk or Department and Subsequent Execution and Routing

This scenario illustrates the reporting requirements to OATS when an order transmitted to another desk where it is then partially executed with the leaves quantity routed to another market center for execution. In this scenario, an order was received by the firm on a Not Held basis and transmitted to the Trading Desk on a Held basis. The Trading Desk executed a portion of the order as principal and then routed the remaining quantity to another market center for execution. This scenario illustrates that Member Firm 1 would be required to report the following when the order is received:

- 1. The receipt of the order from the customer.
- 2. The transmittal of the order to the Trading Desk.
- 3. The partial execution of the order.
- 4. The route of the remaining shares of the order.

The order receipt time is the time the firm received the order from the customer.

In this scenario, the order is routed electronically to another member (Member Firm 2). Member Firm 2 would be required to report the following:

- 1. The receipt of the order.
- 2. The execution of the order.

This scenario illustrates the following additional details:

- 1. Since the order was received as Not Held, Member Firm 1 must use a Special Handling Code of 'Not Held' (NH) to indicate the order was received as Not Held. In addition, since the order was transferred to the Trading Desk as Held, no Desk Special Handling Codes would be reported on the Desk Report.
- 2. Since the order was routed electronically, Member Firm 2 must capture the Routed Order ID and Firm MPID of Member Firm 1 and report this information on its New Order Report to OATS.
- 3. When reporting to a FINRA transaction reporting system, both Member Firm 1 and Member Firm 2 are required to submit a unique identifier (e.g., Branch Sequence Number, Compliance ID) that is used to match the trade report to the related OATS Execution or Combined Order/Execution Report. The firms will also submit this unique identifier to OATS as the OATS Trade ID on the Execution Report.

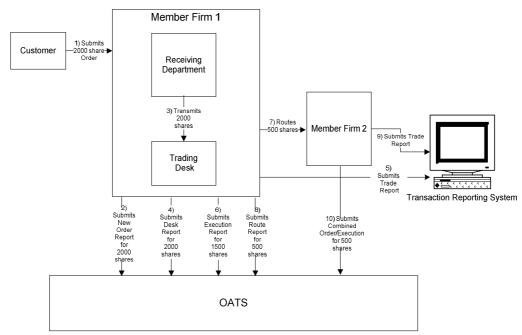


Figure 4-6. Desk Transmittal to another Desk or Department and Subsequent Execution and Routing

- 1. Member Firm 2 received and executed the order in a single trade within the same day; otherwise, separate New and Execution Reports must be used.
- 2. The Route to Member Firm 2 is routed on an agency basis.
- 3. The partial execution by Member Firm 1 is on a principal basis.
- 4. The trade is reported to the FINRA/NASDAQ Trade Reporting Facility.

Table 4-7. Desk Transmittal to another Desk or Department and Subsequent Execution and Routing, Event Listing

Ref	Event	Event Details	
1	Receiving Department receives order from	Market sell order for 2,000 shares of	ORCL.
	customer.	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
2	Member Firm 1 submits a New Order Report to OATS.	New Order Report sample data inclu Order Receiving Firm MPID: Order Received Date: Order Received Timestamp: Received Method Code: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Trading Session Code: Receiving Department ID: Originating Department ID: Order Origination Code: Account Type Code: Member Type Code: ATS Display Indicator: Desk Time Code:	des: FIRM 20101231000000000 ABCD1234 20101231102236721 E ORCL SL 2000 REG O
		Desk Type Code:	NH
2	Desciving Denortment transmits the order to the	Special Handling Code 1:	
3	Receiving Department transmits the order to the Trading Desk.	The Receiving Department transmits ORCL to the Trading Desk.	2,000 snares of
4	Member Firm 1 submits Desk Report to OATS.	Desk Report sample data includes: Order Receiving Firm MPID: Order Received Date: Order Receiving Firm Order ID: Issue Symbol ID: Shares Quantity: Desk Received Timestamp: Desk Type Code: Desk Special Handling Code 1:	FIRM 20101231000000000 ABCD1234 ORCL 2000 20101231102400999 T
5	Member Firm 1 executes 1500 shares of the order as principal and reports the trade to the FINRA/NASDAQ Trade Reporting Facility.	Trade report includes Branch Sequen ABCD1224.	nce Number
6	Member Firm 1 submits Execution Report to OATS.	Execution Report sample data includ Order Receiving Firm MPID: Order Received Date: Order Receiving Firm Order ID: Execution Timestamp: OATS Trade ID: Execution Quantity: Trader Terminal ID: Issue Symbol ID: Market Center ID: Execution Type Indicator: Execution Price: Capacity Code:	FIRM 20101231000000000 ABCD1234 20101231102501434 ABCD1224 1500 TERM00300 ORCL L P 31.00 P
7	Member Firm 1 routes the partial shares quantity to Member Firm 2.	Member Firm 1 electronically routes to Member Firm 2.	500 shares of ORCL
8	Member Firm 1 submits a Route Report to OATS.	Route Report sample data includes: Order Receiving Firm MPID: Order Received Date: Order Receiving Firm Order ID:	FIRM 20101231000000000 ABCD1234

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Ref	Event	Event Details	S
		Sent to Firm MPID:	MF02
		Routed Order ID:	ABCD1234
		Issue Symbol ID:	ORCL
		Order Sent Timestamp:	20101231102535786
		Routed Shares Quantity:	500
		Routing Method Code:	E
		Special Routing Condition:	
		Destination Code:	M
9	Member Firm 2 executes the order from Member	The FINRA transaction reporting sy	stem report includes
	Firm 1 and reports the trade to the	DEFG4568 as the Branch Sequence	Number.
	FINRA/NASDAQ Trade Reporting Facility.		
10	Member Firm 2 submits Combined	Combined Order/Execution Report	sample data includes:
	Order/Execution Report to OATS.	Order Receiving Firm MPID:	MF02
	_	Order Received Date:	20101231102535786
		Order Receiving Firm Order ID:	DEFG4568
		Routing Firm MPID:	FIRM
		Routed Order ID:	ABCD1234
		Order Received Timestamp:	20101231102535786
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	500
		Order Origination Code:	W
		Account Type Code:	U
		Member Type Code:	M
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	
		Execution Timestamp:	20101231102540328
		OATS Trade ID:	DEFG4568
		Execution Quantity:	500
		Trader Terminal ID:	TERM00392
		Issue Symbol ID:	ORCL
		Market Center ID:	L
		Execution Price:	31.00
		Capacity Code:	P

4.4.7 Order Routing and Subsequent Execution

This scenario illustrates the reporting requirements to OATS when a customer's order is routed to another FINRA member firm on an agency basis and subsequently executed by the receiving member firm. In this scenario, the routing member firm is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The route of the order to another member firm.

In this scenario, the receiving member firm is required to report the following events to OATS:

- 1. The receipt of the order from the routing member firm.
- 2. The execution of the order.

Furthermore, this scenario illustrates the following details:

- 1. If this order were routed electronically, the receiving member firm would be required to capture the Routed Order ID and Firm MPID of the routing member firm and report this information on its Combined Order/Execution Report to OATS. If this order had been routed via telephone, the receiving member firm would only be required to capture the Firm MPID of the routing member firm.
- 2. Only the receiving member firm is required to report the execution to OATS because it executed the order.
- 3. When reporting to a FINRA transaction reporting system, the receiving member firm is required to submit a unique identifier (e.g., Branch Sequence Number, Compliance ID) for the purpose of matching to the related OATS Execution Report. The receiving member firm must also submit this unique identifier as the OATS Trade ID on the Combined Order/Execution Report. The unique identifier is used to match the trade report to the related OATS Execution or Combined Order/Execution Report.

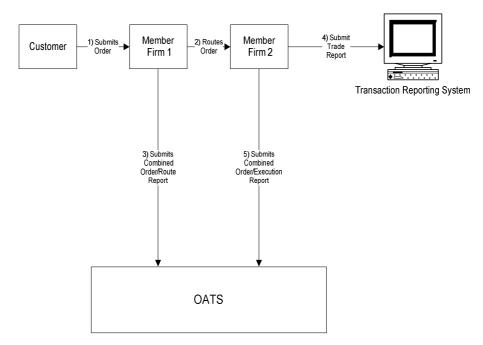


Figure 4-7. Order Routing and Subsequent Execution

- 1. The order was received directly by the desk/department that handled the order.
- 2. The routing member firm received and fully routed the order on the same business day; otherwise, separate New Order and Route Reports must be used.
- 3. The receiving member firm received and fully executed the order in one trade on the same day; otherwise, separate New Order and Execution Reports must be used.
- 4. The customer order is routed electronically on an agency basis.
- 5. The order is executed by the receiving member firm on a principal basis.
- 6. The trade is reported to the FINRA/NASDAQ Trade Reporting Facility.

Table 4-7. Order Routing and Subsequent Execution, Event Listing

Ref	Event	Event Details	
1	Member Firm 1 receives order from the	Market sell order for 2,000 shares of ORCL.	
	customer.		
2	Member Firm 1 electronically routes order to Member Firm 2.	Routed sell order for 2,000 shares of ORCL.	
3	Member Firm 1 submits Combined	Combined Order/Route Report sample data includes:	
	Order/Route Report to OATS.	Order Receiving Firm MPID:	FIRM
		Order Received Date:	20101231105755345
		Order Receiving Firm Order ID:	ABC123
		Order Received Timestamp:	20101231105755345
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	2000
		Receiving Department ID:	A
		Originating Department ID:	
		Order Origination Code:	F
		Account Type Code:	I
		Received Method Code:	Е
		Member Type Code:	N
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:) (FF0.2
		Sent to Firm MPID:	MF02
		Sent to Routed Order ID:	JKL123
		Order Sent Timestamp:	20101231105756552
		Routed Shares Quantity:	2000
		Routing Method Code:	Е
		Special Routing Condition: Destination Code:	M
4	Member Firm 2 executes order from Member		
4	Firm 1 and reports the trade to the	Trade report includes DEF456 as the Branch Sequence Number.	
	FINRA/NASDAQ Trade Reporting Facility.	Tumber.	
5	Member Firm 2 submits Combined	Combined Order/Execution Report sample data includes:	
	Order/Execution Report to OATS.	Order Receiving Firm MPID:	MF02
	1	Order Received Date:	20101231105756884
		Order Receiving Firm Order ID:	DEF456
		Routing Firm MPID:	FIRM
		Routed Order ID:	JKL123
		Order Received Timestamp:	
		20101231105756884	
		Received Method Code:	Е
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	2000
		Receiving Department ID:	T
		Order Origination Code:	***
		Order Origination Code:	W
		Account Type Code:	I
		Member Type Code:	M
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	20101221105759002
		Execution Timestamp: OATS Trade ID:	20101231105758002 DEE456
			DEF456
		Execution Quantity:	2000

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Ref	Event	Event Details	
		Trader Terminal ID:	TERM00392
		Market Center ID:	L
		Execution Price:	31.00
		Capacity Code:	P

4.4.8 Split Order Routing and Subsequent Execution

This scenario illustrates the reporting requirements to OATS when a member firm routes the order to two different receiving FINRA member firms. In this scenario, the member firm is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The route of the order to each receiving member firm.

Each receiving member firms are required to report the following events to OATS:

- 1. The receipt of the order from the routing member firm.
- 2. The execution of the order.

Furthermore, this scenario illustrates the following details:

 Each receiving member firm will be required to send a Combined Order/Execution Report for the order it receives from the member. Because all routing in this scenario is electronic, each receiving member firm is required to include the Routed Order ID and Firm MPID of the member (routing firm) on its New Order Report.

When reporting to a FINRA transaction reporting system, each executing firm will be required to submit a unique identifier (e.g., Branch Sequence Number, Compliance ID) for the purpose of matching to the related OATS Execution Report. Each executing member firm must also submit this unique identifier as the OATS Trade ID on the Combined Order/Execution Report. The unique identifier is used to match the trade report to the related OATS Execution or Combined Order/Execution Report.

5) Routes Order for 5000-shares 1) Submits Order for 10000 Member Customer Member Firm 1 Firm 3 7) Submits Member Trade Report Transaction Reporting System Firm 2 4) Submits Route Report Route Report for 5000 Shores New Report
Order for
Report for 5000
10000 shares shares 8) Submits Combined Order/Execution Report OATS

Figure 4-8. Split Order Routing and Subsequent Execution

- 1. The order was received directly by the desk/department that handled the order.
- 2. Both receiving member firms received and fully executed the order in one trade on the same day; otherwise, separate New Order and Execution Reports must be used.
- 3. The customer order is routed electronically on an agency basis.
- 4. The order is executed by both receiving member firms on a principal basis.
- 5. The trades are reported to the FINRA/NASDAQ Trade Reporting Facility.

Table 4-8. Split Order Routing and Subsequent Execution, Event Listing

Ref	Event	Event Details	
1	Member Firm 1 receives order from customer.	Limit sell order for 10,000 shares of	
2	Member Firm 1 submits New Order Report to	New Order Report sample data includes:	
	OATS.	Order Receiving Firm MPID:	FIRM
		Order Received Date:	20101231101436721
		Order Receiving Firm Order ID:	ABC123
		Order Received Timestamp:	20101231101436721
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Receiving Department ID:	A
		Originating Department ID:	
		Order Origination Code:	F
		Account Type Code:	I
		Shares Quantity:	10000
		Limit Price:	31.00
		Time in Force Code:	GTC
		Special Handling Code 1:	NH
		Member Type Code:	N
		ATS Display Indicator: Desk Timestamp:	
		Desk Type Code:	
3	Member Firm routes order to Member Firm 2.	Limit sell order for 5,000 shares of 0	ORCL routed to
3	Member Firm routes order to Member Firm 2.	Member Firm 2.	JKCL Touted to
4	Member Firm submits Route Report to OATS.	Route Report sample data includes:	
-	Weinber I i'm sublints Route Report to 07115.	Order Receiving Firm MPID:	FIRM
		Order Received Date:	20101231101436721
		Order Receiving Firm Order ID:	ABC123
		Sent to Firm MPID:	MF02
		Routed Order ID:	ABC123
		Issue Symbol ID:	ORCL
		Order Sent Timestamp:	20101231101500123
		Routed Shares Quantity:	5000
		Routing Method Code:	E
		Special Routing Condition:	
		Destination Code:	M
5	Member Firm routes balance of order to	Limit sell order for 5,000 shares of 0	ORCL routed to
	Member Firm 3.	Member Firm 3.	
6	Member Firm submits Route Report to OATS.	Route Report sample data includes:	
		Order Receiving Firm MPID:	FIRM
		Order Received Date:	20101231101436721
		Order Receiving Firm Order ID:	ABC123
		Sent to Firm MPID: Routed Order ID:	MF03 DEF456
		Issue Symbol ID:	ORCL
		Order Sent Timestamp:	20101231101545999
		Routed Shares Quantity:	5000
		Routing Method Code:	E
		Special Routing Condition:	
		Destination Code:	M
7	Member Firm 2 executes the order from	Trade report includes Branch Seque	
	Member Firm 1 and reports the trade to the	,	
	FINRA/NASDAQ Trade Reporting Facility.		
8	Member Firm 2 submits Combined	Combined Order/Execution Report sample data includes:	
	Order/Execution Report to OATS.	Order Receiving Firm MPID:	MF02
		Order Received Date:	20101231102500123

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Ref	Event	Event Details	
		Order Receiving Firm Order ID:	ORD789
		Routing Firm MPID:	FIRM
		Routed Order ID:	ABC123
		Order Received Timestamp:	20101231101500123
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	5000
		Limit Price:	31.00
		Receiving Department ID:	T
		Originating Department ID:	
		Order Origination Code:	W
		Account Type Code:	I
		Member Type Code:	M
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	
ı		Execution Timestamp:	20101231102300999
		OATS Trade ID:	LMN123
		Execution Quantity:	5000
		Trader Terminal ID:	TERM00392
		Market Center ID:	L
		Execution Price:	31.03
		Capacity Code:	P
9	Member Firm 3 executes the order from	Trade report includes Branch Seque	nce Number JKL789.
	Member Firm 1 and reports the trade to the FINRA/NASDAQ Trade Reporting Facility.		
10	Member Firm 3 submits Combined	Combined Order/Execution Report	comple data includes:
10	Order/Execution Report to OATS.	Order Receiving Firm MPID:	MF03
	Order/Execution Report to Orris.	Order Received Date:	20101231101545999
		Order Receiving Firm Order ID:	JKL789
		Routing Firm MPID:	FIRM
		Routed Order ID:	DEF456
		Order Received Timestamp:	20101231101545999
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	5000
		Limit Price:	31.00
		Receiving Department ID:	T
		Originating Department ID:	
		Order Origination Code:	W
		Account Type Code:	I
		Member Type Code:	M
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	
		Execution Timestamp:	20101231101715324
		OATS Trade ID:	JKL789
		Execution Quantity:	5000
		Trader Terminal ID:	TERMA100
		Market Center ID:	L
		Execution Price:	31.01
		Capacity Code:	P

4.4.9 Bunched Order Routing

This scenario illustrates the reporting requirements to OATS when a member firm bunches customer orders and routes the bunched order to a market maker for execution. In this scenario, the member firm is required to report the following events to OATS:

- 1. The receipt of each customer order.
- 2. The route of the orders to the market maker.

The market maker is required to report the following events to OATS:

- 1. The receipt of the bunched order from the member firm.
- 2. The execution of the order.

Furthermore, this scenario illustrates the following details:

- 1. The member firm is required to submit two Combined Order/Route Reports (one for each customer order) to OATS. On each Combined Order/Route Report, the member firm must indicate that the order will be routed as part of a bunched order. In addition, the member firm must indicate the total quantity of the bunched order routed on each Combined Order/Route Report.
- 2. The market maker is required to capture the Firm MPID of the member firm and report this information on its New Order Report to OATS.
- 3. If the orders are electronically routed, the same Routed Order ID must be provided on each Combined Order/Route Report. If the orders are routed manually, a Routed Order ID is not required.
- 4. The market maker is not required to have knowledge that the order was bunched by the member firm and, therefore, submits one New Order Report to OATS.
- 5. When reporting to a FINRA transaction reporting system, the market maker is required to submit a unique identifier (e.g., Branch Sequence Number, Compliance ID) for the purpose of matching to the related OATS Execution Report. The market maker must also submit this unique identifier as the OATS Trade ID on the Combined Order/Execution Report. The unique identifier is used to match the trade report to the related OATS Execution or Combined Order/Execution Report.

Customer 1 1) Submits Order 3) Routes 6) Submits Member Firm Market Maker Trade Report 2) Submits Order Transaction Reporting System Customer 2 7) Submits 4) Submits two one Combined Combined Order/Route Order/Execution Reports Report **OATS**

Figure 4-9. Bunched Order Routing

- 1. The order was received directly by the desk/department that handled the order.
- 2. The member firm received and fully routed each order on the same day; otherwise, separate New Order and Route Reports must be used.
- 3. The market maker received and fully executed the order on the same day; otherwise, separate New Order and Execution Reports must be used.
- 4. The customer order is routed on an agency basis.
- 5. The order is executed on a principal basis.
- 6. The trade is reported to the FINRA/NASDAQ Trade Reporting Facility.

Table 4-9. Bunched Routing, Event Listing (Manual Method), Event Listing

Ref	Event	Event Details	
1	Member Firm receives order from	Market sell order for 2,000 shares of	
	Customer 1.		
2	Member Firm receives order from	Market sell order for 3,000 shares of ORCL.	
	Customer 2.		
3	Member Firm routes customers' orders to Market Maker.	Market sell order for 5,000 shares of	FORCL.
4	Member Firm submits two Combined	Combined Order/Route Report samp	ole data includes:
	Order/Route Reports to OATS.	Order Receiving Firm MPID:	FIRM
	•	Order Received Date:	20101231105355111
		Order Receiving Firm Order ID:	ABC123
		Order Received Timestamp:	20101231105355111
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	S
		Shares Quantity:	2000
		Receiving Department ID:	A
		Originating Department ID:	T.
		Order Origination Code:	F
		Account Type Code:	I N
		Member Type Code: ATS Display Indicator:	IN
		Desk Timestamp:	
		Desk Type Code:	
		Sent to Firm MPID:	MM01
		Sent to Routed Order ID:	1/11/101
		Order Sent Timestamp:	20101231110015999
		Routed Shares Quantity:	5000
		Routing Method Code:	N
		Special Routing Condition:	Y
		Destination Code:	M
		Order Receiving Firm MPID:	FIRM
		Order Received Date:	20101231105359100
		Order Receiving Firm Order ID:	DEF456
		Order Received Timestamp:	20101231105359100
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	3000
		Receiving Department ID: Originating Department ID:	A
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	3.0.401
		Sent to Firm MPID:	MM01
		Sent to Routed Order ID:	20101221110015000
		Order Sent Timestamp:	20101231110015999
		Routed Shares Quantity:	5000 N
		Routing Method Code: Special Routing Condition:	Y Y
		Destination Code:	M M
5	Market Maker executes order from	Trade report includes Branch Seque	
J	TVIAIRCE TVIARCE CACCULES UTUEL HUIII	Trade report includes Branch Seque	nee munioer OIII/07.

ORDER REPORTING

	Member Firm and reports the trade to the		
	FINRA/NASDAQ Trade Reporting		
	Facility.	G 1: 10.1 /F : B	
6	Market Maker submits Combined	Combined Order/Execution Report sample data includes:	
	Order/Execution Report to OATS.	Order Receiving Firm MPID:	MM01
		Order Received Date:	20101231110016225
		Order Receiving Firm Order ID:	GHI789
		Routing Firm MPID:	FIRM
		Routed Order ID:	
		Order Received Timestamp:	20101231110016225
		Received Method Code:	N
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	5000
		Receiving Department ID:	T
		Originating Department ID:	
		Order Origination Code:	W
		Account Type Code:	I
		Member Type Code:	M
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	
		Execution Timestamp:	20101231110355999
		OATS Trade ID:	GHI789
		Execution Quantity:	5000
		Trader Terminal ID:	7851125
		Issue Symbol ID:	ORCL
		Execution Type Indicator:	F
		Market Center ID:	L
		Execution Price:	31.00
		Capacity Code:	P

Table 4-10. Bunched Routing, Event Listing (Electronic Method), Event Listing

Ref	Event	Event Details	
1	Member Firm receives order from Customer	Market sell order for 2,000 shares of ORCL.	
	1.		
2	Member Firm receives order from Customer	Market sell order for 3,000 shares of ORCL.	
	2.		
3	Member Firm routes customers' orders to	Market sell order for 5,000 shares of	f ORCL.
	Market Maker.		
4	Member Firm submits two Combined	Combined Order/Route Report sample data includes:	
	Order/Route Reports to OATS.	Order Receiving Firm MPID:	FIRM
		Order Received Date:	20101231105355654
		Order Receiving Firm Order ID:	ABC123
		Order Received Timestamp:	20101231105355654
		Received Method Code:	E ORCL
		Issue Symbol ID:	S
		Buy/Sell Code: Shares Quantity:	2000
		Receiving Department ID:	2000 A
		Originating Department ID:	Α
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		ATS Display Indicator:	11
		Desk Timestamp:	
		Desk Type Code:	
		Sent to Firm MPID:	MM01
		Sent to Routed Order ID:	ZYX987
		Order Sent Timestamp:	20101231110015321
		Routed Shares Quantity:	5000
		Routing Method Code:	E
		Special Routing Condition:	Y
		Destination Code:	M
		Orden Bessiving Firm MDID	EIDM
		Order Receiving Firm MPID: Order Received Date:	FIRM 20101231105355767
		Order Received Date. Order Receiving Firm Order ID:	DEF456
		Order Received Timestamp:	20101231105455767
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	3000
		Receiving Department ID:	A
		Originating Department ID:	
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	NO 101
		Sent to Firm MPID:	MM01
		Sent to Routed Order ID:	ZYX987
		Order Sent Timestamp:	20101231110015321
		Routing Method Code:	5000 E
		Routing Method Code:	E Y
		Special Routing Condition: Destination Code:	Y M
5	Market Maker executes the order from		
٥	ivialket iviaket executes the order from	Trade report includes Branch Seque	nce muniber

ORDER REPORTING

	Member Firm and reports the trade to the	GHI789.	
	FINRA/NASDAQ Trade Reporting Facility.		
6	Market Maker submits Combined	Combined Order/Execution Report	sample data includes:
	Order/Execution Report to OATS.	Order Receiving Firm MPID:	MM01
		Order Received Date:	20101231110016321
		Order Receiving Firm Order ID:	GHI789
		Routing Firm MPID:	FIRM
		Routed Order ID:	ZYX987
		Order Received Timestamp:	20101231110016321
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	5000
		Receiving Department ID:	T
		Originating Department ID:	
		Order Origination Code:	W
		Account Type Code:	I
		Member Type Code:	M
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	
		Execution Timestamp:	20101231110355877
		OATS Trade ID:	GHI789
		Execution Quantity:	5000
		Trader Terminal ID:	7851125
		Market Center ID:	L
		Execution Price:	31.00
		Capacity Code:	P

4.4.10 Manual Order Routing to a National Securities Exchange

This scenario illustrates the reporting requirements to OATS when a member firm manually routes an order to a national securities exchange. In this scenario, the member firm is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The route of the order to the national securities exchange.

Furthermore, this scenario illustrates the following details:

- 1. On the Route Report, the member firm enters a Destination Code to identify the national securities exchange where the order is routed, the Routing Method Code and Exchange Participant ID.
- 2. A Routed Order ID is not required when an order is routed manually.

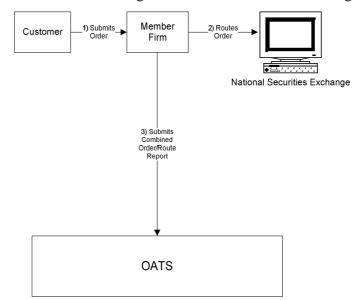


Figure 4-10. Manual Order Routing to a National Securities Exchange

- 1. The order was received directly by the desk/department that handled the order.
- 2. The member received and fully routed the order on the same day; otherwise, separate New Order and Route Reports must be used.
- 3. The member manually routed the order to The NASDAQ Stock Market.
- 4. The customer order is routed on an agency basis.
- 5. The order was routed manually; therefore, a Routed Order ID would not be required.

Table 4-11. Manual Order Routing to a National Securities Exchange, Event Listing

Ref	Event	Event Details	
1	Member Firm receives order from customer.	Market sell order for 2,000 shares of	ORCL.
2	Member Firm enters order into The NASDAQ	Member Firm includes Order ID Number ABCD1234	
	Stock Market.	on the order.	
3	Member Firm submits Combined Order/Route	Combined Order/Route Report sample data includes:	
	Report to OATS.	Order Receiving Firm MPID:	FIRM
		Order Received Date:	20100103105855321
		Order Receiving Firm Order ID:	ABCD1234
		Order Received Timestamp:	20100103105855321
		Received Method Code:	N
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	2000
		Receiving Department ID:	A
		Originating Department ID:	
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		Sent to Firm MPID:	
		Sent to Routed Order ID:	
		Order Sent Timestamp:	20100103105915765
		Routed Shares Quantity:	2000
		Routing Method Code:	N
		Special Routing Condition:	
		Exchange Participant ID:	FIRM
		Destination Code:	XQ

4.4.11 Electronic Order Routing to a National Securities Exchange

This scenario illustrates the reporting requirements to OATS when a member firm electronically routes an order to a national securities exchange. In this scenario, the member firm is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The route of the order to a national securities exchange.

Furthermore, this scenario illustrates the following details:

1. On the Route Report, the member firm enters a Destination Code to identify the exchange to which the order was routed, a Routed Order ID, the Routing Method Code and Exchange Participant ID.

NOTE: When routing an order electronically to a national securities exchange, the routing firm must include the Routed Order ID on the exchange order in the manner as required by the exchange to which the order is being routed.

Customer

1) Submits
Order

National Securities Exchange

3) Submits
Combined
Order/Route
Report

OATS

Figure 4-11. Electronic Order Routing to a National Securities Exchange

- 1. The order was received directly by the desk/department that handled the order.
- 2. The member received and fully routed the order on the same day; otherwise, separate New Order and Route Reports must be used.
- 3. The member electronically routed the order to the New York Stock Exchange.
- 4. The customer order is routed on an agency basis.
- 5. The order was routed electronically; therefore, a Routed Order ID is required.

Table 4-12. Electronic Order Routing to a National Securities Exchange Event Listing

Ref	Event	Event Details	
1	Member Firm receives order from customer.	Market sell order for 2,000 shares of	IBM.
2	Member Firm enters order into the New York	Member Firm includes Order ID Number ABCD1234	
	Stock Exchange.	on the order.	
3	Member Firm submits Combined Order/Route	Combined Order/Route Report sample data includes:	
	Report to OATS.	Order Receiving Firm MPID:	FIRM
		Order Received Date:	20100103105855321
		Order Receiving Firm Order ID:	ABCD1234
		Order Received Timestamp:	20100103105855321
		Received Method Code:	E
		Issue Symbol ID:	IBM
		Buy/Sell Code:	SL
		Shares Quantity:	2000
		Receiving Department ID:	A
		Originating Department ID:	
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	
		Sent to Firm MPID:	
		Sent to Routed Order ID:	ABCD1234
		Order Sent Timestamp:	20100103105915765
		Routed Shares Quantity:	2000
		Routing Method Code:	E
		Special Routing Condition:	
		Exchange Participant ID:	FRM
		Destination Code:	XN

4.4.12 Order Routing to a Non-FINRA Member Firm

When a firm routes an order to a non-FINRA member firm, the non-FINRA member is not required to report the order to OATS. The FINRA member firm is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The route of the order to a non-FINRA member firm.

Furthermore, this scenario illustrates the following details:

1. On the Combined Order/Route Report, the FINRA member firm enters a Destination Code of Non-FINRA Member Firm and the MPID of the non-FINRA member, if available, as the Sent to Firm MPID.

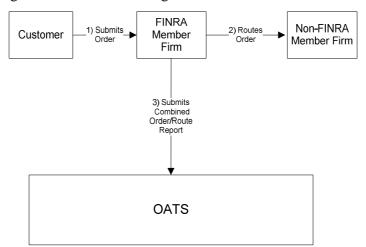


Figure 4-12. Order Routing to a Non-FINRA Member Firm

- 1. The order was received directly by the desk/department that handled the order.
- 2. The FINRA member firm received and fully routed the order on the same day; otherwise, separate New Order and Route Reports must be used.
- 3. The customer order is routed on an agency basis.

Table 4-13. Order Routing to a Non-FINRA Member Firm, Event Listing

Ref	Event	Event Deta	ils
1	FINRA Member Firm receives order from customer.	Market sell order for 2,000 shares of ORCL.	
2	FINRA Member Firm routes order to Non-FINRA Member Firm.	FINRA Member Firm electronically routes 2000 shares of ORCL to the non-member firm.	
3	FINRA Member Firm submits Combined Order/Route Report to OATS.	Combined Order/Route Report sar Order Receiving Firm MPID: Order Received Date: Order Received Timestamp: Received Method Code: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Receiving Department ID: Order Origination Code: Account Type Code: ATS Display Indicator: Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Routed Order ID: Order Sent Timestamp: Routed Shares Quantity: Routing Method Code: Special Routing Condition: Destination Code:	mple data includes: FIRM 20101231110015999 ABC123 20101231110015999 E ORCL SL 2000 A F I N NON1 ABCD1234 20101231110023677 2000 E N

4.4.13 Order Routing Between MPIDs within a Firm and Subsequent Execution

This scenario illustrates the reporting requirements to OATS when a customer order is routed between two valid MPIDs within the same firm and subsequently executed. In this scenario, MPID1 is required to report the following events to OATS:

- 1. The receipt of the customer order.
- 2. The route of the order to MPID2.

In this scenario, MPID2 is required to report the following events to OATS:

- 1. The receipt of the routed order by MPID1.
- 2. The execution of the order.

Furthermore, this scenario illustrates the following details:

- 1. The order is electronically routed, therefore; MPID2 is required to capture the Routed Order ID and Firm MPID of MPID1 and report this information on its New Order Report to OATS.
- 2. Only MPID2 is required to report the execution to OATS because it executed the order.
- 3. When reporting to a FINRA transaction reporting system, MPID2 is required to submit a unique identifier (e.g., Branch Sequence Number, Compliance ID) for the purpose of matching to the related OATS Execution Report. MPID2 must also submit this unique identifier as the OATS Trade ID on the Combined Order/Execution Report. The unique identifier is used to match the trade report to the related OATS Execution or Combined Order/Execution Report.

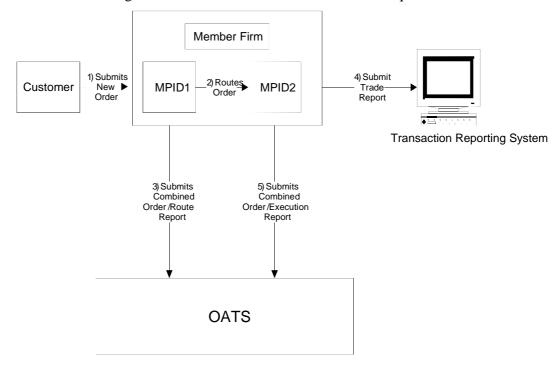


Figure 4-13. Order Routing Between MPIDs within a Firm and Subsequent Execution

- 1. The order was received directly by the desk/department that handled the order.
- 2. MPID1 received and electronically routed, in full, the order to MPID2 on the same business day; otherwise, MPID1 must use separate New Order and Route Reports.
- 3. MPID2 received and fully executed the order in one trade on the same day; otherwise, separate New Order and Execution Reports must be used.
- 4. The order is executed on a principal basis.
- 5. The order was routed electronically; therefore, a Routed Order ID is required. If the order was routed manually, a Routed Order ID would not be required.
- 6. The trade is reported to the FINRA/NASDAQ Trade Reporting Facility.

Table 4-14. Order Routing Between MPIDs within a Firm and Subsequent Execution, Event Listing

Ref	Event	Event Detail	ls
1	Member Firm receives order from customer.	Market sell order for 2,000 shares of	
2	MPID1 electronically routes order to MPID2.	Routed sell order for 2,000 shares of	f ORCL.
3	MPID1 submits a Combined Order/Route	Combined Order/Route Report samp	ple data includes:
	Report to OATS.	Order Receiving Firm MPID:	MPID1
		Order Received Date:	20101231105755656
		Order Receiving Firm Order ID:	ABC123
		Order Received Timestamp:	20101231105755656
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	2000
		Receiving Department ID:	A
		Originating Department ID: Order Origination Code:	F
		Account Type Code:	I
		Received Method Code:	E
		Member Type Code:	N
		ATS Display Indicator:	• 1
		Desk Timestamp:	
		Desk Type Code:	
		Sent to Firm MPID:	MPID2
		Sent to Routed Order ID:	ABC123
		Order Sent Timestamp:	20101231110015999
		Routed Shares Quantity:	2000
		Routing Method Code:	E
		Special Routing Condition:	M
4	MPID2 executes the order from MPID1 and	Destination Code: Trade report includes Branch Seque	M
4	reports the trade to the FINRA/NASDAQ	Trade report includes Branch Seque	nce Number DEF456.
	Trade Reporting Facility.		
5	MPID2 submits Combined Order/Execution	Combined Order/Execution Report	sample data includes:
	Report to OATS.	Order Receiving Firm MPID:	MPID2
	_	Order Received Date:	20101231110015999
		Order Receiving Firm Order ID:	DEF456
		Routing Firm MPID:	MPID1
		Routed Order ID:	ABC123
		Order Received Timestamp:	20101231110015999
		Received Method Code:	E
		Issue Symbol ID:	ORCL SL
		Buy/Sell Code: Shares Quantity:	2000
		Receiving Department ID:	7 T
		Originating Department ID:	1
		Order Origination Code:	W
		Account Type Code:	I
		Member Type Code:	M
		ATS Display Indicator:	
		Desk Timestamp:	
		Execution Timestamp:	20101231110300999
		OATS Trade ID:	DEF456
		Execution Quantity:	2000
		Trader Terminal ID:	TERM00392
		Market Center ID: Execution Price:	L 21.00
		Execution Price: Capacity Code:	31.00 P
		Capacity Code.	1

4.4.14 Order Routing to an Options Exchange

This scenario illustrates the reporting requirements to OATS when a member (Member Firm 1) routes an order with two components, an options component and cash component, to an options exchange, where the cash component is matched against an offsetting order from another member (Member Firm 2) and then sent by the options exchange to a FINRA member (Member Firm 3) for execution and reporting to a FINRA transaction reporting system. In this scenario, Member Firm 1 is required to report the following events to OATS:

- 1. The receipt of the buy order from the customer.
- 2. The route of the order to the options exchange.

Member Firm 2 is required to report the following events to OATS:

- 1. The receipt of the sell order from the customer.
- 2. The route of the order to the options exchange.

Member Firm 3 receives the offsetting buy and sell orders from the options exchange and executes an agency cross which is reported to a FINRA transaction reporting system. Member Firm 3 is required to report the following events to OATS:

- 1. The receipt of the sell order from the options exchange.
- 2. The receipt of the buy order from the options exchange.
- 3. The execution report for the buy order.
- 4. The execution report for the sell order.

Furthermore, this scenario illustrates the following details:

- 1. When reporting the agency cross to a FINRA transaction reporting system, Member Firm 3 is required to submit a OATS Trade ID. Member Firm 3 will also submit this OATS Trade ID to OATS on each Execution Report. The OATS Trade ID enables the matching of a trade reported to a FINRA transaction reporting system to a related OATS Execution Report.
- 2. Member Firm 1, Member Firm 2, and Member Firm 3 must include a Special Handling Code of 'OPT' on their New Order events to identify that the terms and conditions of the order were derived from a related options transaction.

1) Submits an Order 5) Matches Cash Options Member Firm 3 8) Submits with 2 components a. Options component Member Firm 1 Exchange from Firm 1 Trade Report (Executing Firm) and Firm 2 b. Čash Transaction 6) Submits New Order 2) Submits Combined Reporting Report System Order/Route for sell order Report for Cash component 7) Submits New Order 3) Submits Report an Order with 2 components for buy order Member a Options b Cash Firm 2 9) Submits Execution Report for buy order 4) Submits Combined 10) Submits Execution Order/Route Reports for Report for sell order Cash component OATS

Figure 4-14. Order Routing to an Options Exchange

- 1. This represents an order where the terms and conditions of the order are derived from a related options transaction.
- 2. The member received and fully routed the order on the same day; otherwise, separate New Order and Route Reports must be used.
- 3. The member electronically routed the order to NASDAQ OMX PHLX.

Table 4-15. Order Routing to an Options Exchange

Ref	Event	Event Details		
1	Member Firm 1 receives order from customer	Sell order for 2,000 shares of ORC	L where the terms and	
	with two components:	conditions are derived from a relate	ed options transaction.	
	a. Options			
	b. Cash			
2	Member Firm 1 submits Combined	Combined Order/Route Report sam	nla data inaludas:	
2		Order Receiving Firm MPID:	FRM1	
	Order/Route Report to OATS.	Order Received Date:	20100103105155212	
		Order Receiving Firm Order ID:	AFRM11234	
		Order Received Timestamp:	20100103105155212	
		Received Method Code:	E	
		Issue Symbol ID:	ORCL	
		Buy/Sell Code:	SL	
		Shares Quantity:	2000	
		Receiving Department ID:	A	
		Originating Department ID:		
		Order Origination Code:	F	
Ì		Account Type Code:	I	
		Member Type Code:	N	
		ATS Display Indicator:		
		Desk Timestamp: Desk Type Code:		
		Sent to Firm MPID:		
		Sent to Routed Order ID:	JKL789	
		Order Sent Timestamp:	20100103105255345	
		Routed Shares Quantity:	2000	
		Routing Method Code:	Е	
		Special Routing Condition:		
		Exchange Participant ID:	FRM1	
		Destination Code:	OX	
		Special Handling Code:	OPT	
3	Member Firm 2 receives order from customer	Buy order for 2,000 shares of ORC		
	with two components:	conditions are derived from a relate	ed options transaction.	
	a. Options			
	b. Cash			
4	Member Firm 2 submits Combined	Combined Order/Route Report sam		
	Order/Route Report to OATS.	Order Receiving Firm MPID:	FRM2	
		Order Received Date:	20100103105359111	
		Order Receiving Firm Order ID:	AFRM25678	
		Order Received Timestamp: Received Method Code:	20100103105359111	
		Issue Symbol ID:	E ORCL	
		Buy/Sell Code:	B	
		Shares Quantity:	2000	
		Receiving Department ID:	A	
		Originating Department ID:		
		Order Origination Code:	F	
		Account Type Code:	I	
		Member Type Code:	N	
		ATS Display Indicator:		
		Desk Timestamp:		
		Desk Type Code:		
		Sent to Firm MPID: Sent to Routed Order ID:	GHI789	
		Order Sent Timestamp:	20100103105459977	
l		Order Sent Timestamp:	201001031034377//	

ORDER REPORTING

Ref	Event	Event Deta	ails
		Routed Shares Quantity:	2000
		Routing Method Code:	E
		Special Routing Condition:	
		Exchange Participant ID:	FRM2
		Destination Code:	OX
		Special Handling Code:	OPT
5	The Buy Order from Member Firm 1 and Sell		
	Order from Member Firm 2 is matched by the		
	exchange and sent to a FINRA member for		
	execution and trade reporting.		
6	Member Firm 3 submits a New Order Report	New Order Report sample data inc	ludes:
	to OATS for the buy order.	Action Type Code:	N
	,	Order Receiving Firm MPID:	FRM3
		Order Received Date:	20100103105500325
		Order Receiving Firm Order ID:	FRM3ABC123
		Order Received Timestamp:	20100103105500325
		Received Method Code:	E
		Issue Symbol ID: Buy/Sell Code:	ORCL B
		Shares Quantity:	2000
		Special Handling Code:	OPT
		Limit Price:	31.00
		Time in Force Code:	21.00
		Receiving Department ID:	T
		Originating Department ID:	
		Order Origination Code:	W
		Account Type Code:	U
		Member Type Code:	N
		ATS Display Indicator:	
		Desk Timestamp:	
7	Manda Pina 2 ada ita Nan Oda Para	Desk Type Code:	11
/	Member Firm 3 submits a New Order Report	New Order Report sample data inc. Action Type Code:	N
	to OATS for the sell order.	Order Receiving Firm MPID:	FRM3
		Order Received Date:	20100103105500325
		Order Receiving Firm Order ID:	FRM3JKL123
		Order Received Timestamp:	20100103105500325
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	2000
		Special Handling Code:	OPT
		Limit Price: Time in Force Code:	31.00
		Receiving Department ID:	T
		Originating Department ID:	1
		Order Origination Code:	W
		Account Type Code:	Ü
		Member Type Code:	N
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	
8	Member Firm 3 executes the cross and	Trade report includes Branch Sequ	
	submits a trade report to the	JKLFRM3123 for the sell order and	
	FINRA/NASDAQ Trade Reporting Facility.	Number ABCFRM3123 for the buy	
9	Member Firm 3 submits Execution Report to	Execution Report sample data inclu	ides:

OATS REPORTING TECHNICAL SPECIFICATIONS

ORDER REPORTING

Ref	Event	Event Details	
	OATS for the buy order.	Order Receiving Firm MPID:	FRM3
		Order Received Date:	20100103105500325
		Order Receiving Firm Order ID:	FRM3ABC123
		Execution Timestamp:	20100103105500388
		OATS Trade ID:	ABCFRM3123
		Execution Quantity:	2000
		Trader Terminal ID:	TERM01
		Issue Symbol ID:	ORCL
		Execution Type Indicator:	F
		Market Center ID:	L
		Execution Price:	31.00
10	Member Firm 3 submits Execution Report to	Execution Report sample data include	des:
	OATS for the sell order.	Order Receiving Firm MPID:	FRM3
		Order Received Date:	20100103105500325
		Order Receiving Firm Order ID:	FRM3JKL123
		Execution Timestamp:	20100103105500388
		OATS Trade ID:	JKLFRM3123
		Execution Quantity:	2000
		Trader Terminal ID:	TERM01
		Issue Symbol ID:	ORCL
		Execution Type Indicator:	F
		Market Center ID:	L
		Execution Price:	31.00

4.4.15 Single Desk Usage of Multiple Order Handling Systems

This scenario illustrates the reporting requirements to OATS when member firms use multiple routing or trading systems within the same desk or department. OATS reporting applies only to transmittals between departments within member firms and not to electronic messages between systems. Order routing between proprietary and/or third party order-entry, routing, or trading systems is not reportable to OATS.

In this scenario, the member firm receives the order via its proprietary order-entry system, but routes the order to another market center or desk using an outside vendor's order routing system. The member firm would report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The route of the order to the market maker.

No OATS events should be generated or reported for the transfer of the order between the proprietary order-entry system and the third party order routing system.

Furthermore, this scenario illustrates the following additional details:

- 1. The order receipt time for the New Order is the time the order is received by the member firm from the customer.
- 2. A new unique order identifier is assigned when the order is initially received by the member firm. Another unique order identifier would not be assigned until the order reached another member firm, such as the market maker. In order to enable a routing system or trading system to report on behalf of a member firm, unique identifiers and other pertinent information must be passed between the systems.

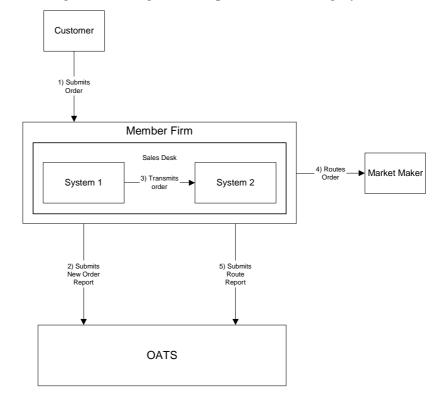


Figure 4-15. Single Desk Usage of Multiple Order Handling Systems

1. The member firm's New Order and Route Orders are captured by separate entities; otherwise, a Combined Order/Route Report must be used.

Table 4-16. Single Desk Usage of Multiple Order Handling Systems, Event Listing

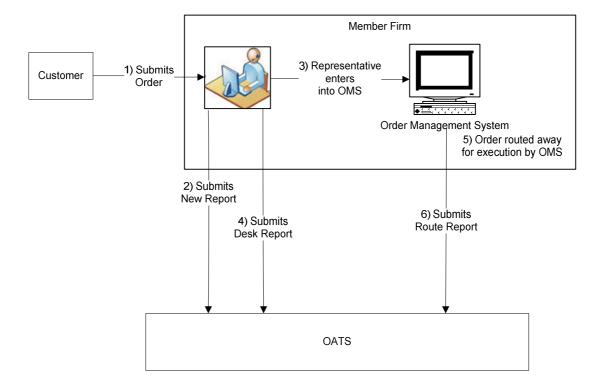
Ref	Event	Event Details		
1	Member Firm receives order from customer	Market sell order for 2,000 shares of ORCL.		
	and enters the order into System 1.			
2	Member Firm submits a New Order Report to	New Order Report sample data includes:		
	OATS.	Order Receiving Firm MPID:	FIRM	
		Order Received Date:	20101231105755999	
		Order Receiving Firm Order ID:	ABCD1234	
		Order Received Timestamp:	20101231105755999	
		Issue Symbol ID:	ORCL	
		Buy/Sell Code:	SL	
		Shares Quantity:	2000	
		Receiving Department ID:	A	
		Originating Department ID:		
		Order Origination Code:	F	
		Account Type Code:	I	
		Received Method Code:	E	
		Member Type Code:	N	
		ATS Display Indicator:		
		Desk Timestamp:		
		Desk Type Code:		
3	Order routing system electronically transmits	Transmits sell order for 2,000 shares of ORCL.		
	Member Firm order to System 2.			
4	System 2 electronically routes Member Firm's	· ·	Routes sell order for 2,000 shares of ORCL to Market	
	order to Market Maker.	Maker.		
5	Member Firm submits Route Report to OATS.	Route Report sample data includes:		
		Order Receiving Firm MPID:	FIRM	
		Order Received Date:	20101231105755999	
		Order Receiving Firm Order ID:	ABCD1234	
		Issue Symbol ID:	ORCL	
		Sent to Firm MPID:	MM01	
		Routed Order ID:	ABCD1234	
		Order Sent Timestamp:	20101231105815999	
		Routed Shares Quantity:	2000	
		Routing Method Code:	E	
		Special Routing Condition:	_	
		Destination Code:	M	
		Destriction Code.	141	

4.4.16 Order received by a Member and subsequently entered into an Order Management System (OMS) or trading system for further handling and execution

This scenario illustrates the reporting requirements to OATS when an order is received by a member firm at a branch or other location that must be entered into an order management system (OMS) or other trading system before it can be further handled or executed. In this scenario, the member firm is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The transmission of the order to the Desk (i.e., place at the firm where the order can be executed either by a computer system or with the assistance of traders).
- 3. The route of the order to a national securities exchange.

Figure 4-16. Order received by a Member and subsequently entered into an Order Management System (OMS) or trading system for further handling and execution



- 1. The order is received at the branch and must be entered in the member firm's OMS or trading system before it can be further handled or executed.
- 2. The order is routed by the firm's OMS to The NASDAQ Stock Market for execution.

OATS REPORTING TECHNICAL SPECIFICATIONS

Table 4-17. Order received by a Member and subsequently entered into an Order Management System (OMS) or trading system for further handling and execution, Event Listing

Ref	Event	Event Details	
1	Member Firm receives order from customer.	Market buy order for 2,000 shares of AAII.	
2	Member Firm submits New Order Report to OATS.	New Order Report sample data included Action Type Code: Order Receiving Firm MPID: Order Received Date: Order Received Timestamp: Order Received Timestamp: Received Method Code: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Limit Price: Time in Force Code: Receiving Department ID: Originating Department ID: Order Origination Code: Account Type Code:	des: N FIRM 20100103102033112 ABC123 20100103102033112 N AAII B 2000 F I
		Member Type Code: ATS Display Indicator: Desk Timestamp: Desk Type Code:	N
3	Representative enters the order into the		
	Member Firm's OMS/Trading system.		
4	Member Firm submits Desk Report to OATS.	Desk Report sample data includes: Order Receiving Firm MPID: Order Received Date: Order Receiving Firm Order ID: Desk Shares Quantity: Issue Symbol ID: Desk Type Code: Desk Received Timestamp:	FIRM 20100103102033112 ABC123 2000 AAII T 20100103102135321
5	Customer order is routed by OMS to The NASDAQ Stock Market.	Member Firm includes Order ID DE	FABC123 on the order.
6	Member Firm submits Route Report to OATS.	Route Report sample data includes: Order Receiving Firm MPID: Order Received Date: Order Receiving Firm Order ID: Sent to Firm MPID: Routed Order ID: Issue Symbol ID: Order Sent Timestamp: Routed Shares Quantity: Routing Method Code: Special Routing Condition: Exchange Participant ID:	FIRM 20100103102033112 ABC123 DEFABC123 AAII 20100103102212789 2000 E FIRM
		Destination Code:	XQ

4.4.17 Multiple Desk Usage of Multiple Order Handling Systems

This scenario illustrates the reporting requirements to OATS when member firms use multiple Order Handling Systems on different desks. OATS reporting applies to transmittals between departments within member firms; therefore, a transmittal to another desk or department within a firm is a reportable event. For example, the department where the order was initially received may use a proprietary order entry system while the firm's Trading Desk uses an outside vendor's trading platform. In this scenario, the member firm would report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. Transmittal of the order to the Trading Desk.
- 3. The route of the order to the market maker.

Furthermore, this scenario illustrates the following additional details:

- 1. The order receipt time for the New Order is the time the order is received by the member firm from the customer.
- 2. A new unique order identifier is assigned when the order is initially received by the member firm. Another unique order identifier would not be assigned until the order reached another member firm, such as the market maker. In order to enable a routing system or trading system to report on behalf of a member firm, unique identifiers and other pertinent information must be passed between the systems.

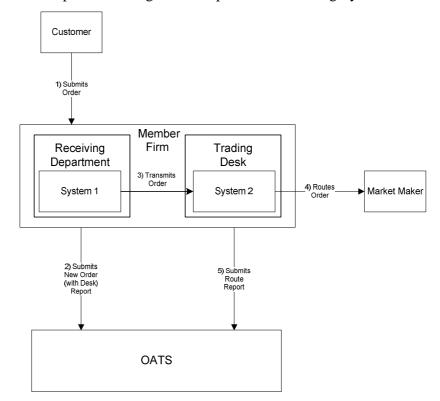


Figure 4-17. Multiple Desk Usage of Multiple Order Handling Systems

- 1. The member firm's New Order and Route Orders are captured by separate entities; otherwise, a Combined Order/Route Report must be used.
- 2. The customer order is routed on an agency basis.

Table 4-18. Multiple Desk Usage of Multiple Order Handling Systems, Event Listing

Ref	Event	Event Details	
1	Member Firm receives order from customer enters the order into System 1.	Market sell order for 2,000 shares of ORCL.	
2	The Institutional Desk transmits the order to the Trading Desk. The order is captured by the Trading Desk in a trading system separate from the trading system used by the Institutional Desk.	System 1 transmits sell order for 2,000 shares of ORCL to System 2.	
3	Member Firm submits New Order (with Desk) Report to OATS.	New Order Report (with Desk) samp Order Receiving Firm MPID: Order Received Date: Order Received Timestamp: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Receiving Department ID: Order Origination Code: Account Type Code: Received Method Code: Member Type Code: ATS Display Indicator: Desk Received Timestamp: Desk Type Code:	ple data includes: FIRM 20101231105755111 ABCD1234 20101231105755111 ORCL SL 2000 O F A E N 20101231105857999 T
4	Trading Desk using System 2 electronically routes Member Firm's order to Market Maker.	Routes sell order for 2,000 shares of ORCL to Market Maker.	
5	Member Firm submits Route Report to OATS.	Route Report sample data includes: Order Receiving Firm MPID: Order Received Date: Order Receiving Firm Order ID: Issue Symbol ID: Sent to Firm MPID: Routed Order ID: Order Sent Timestamp: Routed Shares Quantity: Routing Method Code: Special Routing Condition: Destination Code:	FIRM 20101231105755111 ABCD1234 ORCL MM01 ABCD1234 20101231105915999 2000 E

4.4.18 Order Routing and Execution via a Member Clearing Firm

This scenario illustrates the reporting requirements to OATS when an introducing firm meets the definition of OATS reporting member pursuant to FINRA Rule 7410. In this scenario, the introducing firm enters the customer order into the clearing firm's system. The introducing firm, or the clearing firm on the introducing firm's behalf, would be responsible to report:

- 1. The receipt of the order from the customer.
- 2. The route of the order to the clearing firm.

The clearing firm would report the following:

- 1. The receipt of the order by the clearing firm.
- 2. The execution of the order by the clearing firm.

The introducing firm's order receipt time is the time the order is received from the customer. It may be identical to the order routing timestamp and the clearing firm's order receipt time if it is entered into the clearing firm's system upon receipt from the customer.

Furthermore, this scenario illustrates the following additional details:

- 1. Only the clearing firm is required to report the execution to OATS because it executed the order.
- 2. When reporting to a FINRA transaction reporting system, the clearing firm is required to submit a unique identifier (e.g., Branch Sequence Number, Compliance ID) for the purpose of matching to the related OATS Execution Report. The clearing firm must also submit this unique identifier as the OATS Trade ID on the Combined Order/Execution Report. The unique identifier is used to match the trade report to the related OATS Execution or Combined Order/Execution Report..

NOTE: If the clearing firm routed the order to another center for execution, it would have reported a route instead of the execution.

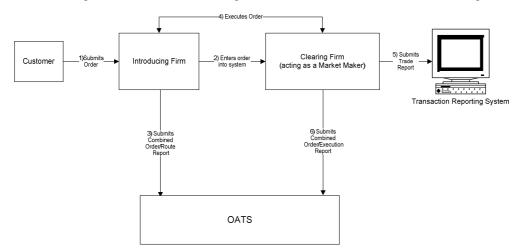


Figure 4-18. Order Routing and Execution via a Member Clearing Firm

- 1. The Introducing Firm is responsible for OATS reporting even if some other entity, such as a clearing firm, acts as its reporting agent.
- 2. The order was received directly by the desk/department that handled the order.
- 3. The customer order is routed on an agency basis.
- 4. The order is executed on a principal basis.
- 5. The trade is reported to the FINRA/NASDAQ Trade Reporting Facility.

Table 4-19. Order Routing and Execution via a Member Clearing Firm, Event Listing

Ref	Event	Event Details	
1	Introducing Firm receives order from	Market sell order for 2,000 shares o	f ORCL.
	customer.		
2	Introducing Firm enters order into Clearing Firm's system.	Market sell order for 2,000 shares of ORCL.	
3	Introducing Firm submits a Combined Order/Route Report to OATS.	Combined Order/Route Report sam Order Receiving Firm MPID: Order Received Date: Order Receiving Firm Order ID: Order Received Timestamp:	FIRM 20101231105755111 ABCD1234 20101231105755111
		Issue Symbol ID: Buy/Sell Code: Shares Quantity: Receiving Department ID: Originating Department ID: Order Origination Code: Account Type Code: Received Method Code: Member Type Code: ATS Display Indicator: Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Routed Order ID: Order Sent Timestamp: Routed Shares Quantity: Routing Method Code:	ORCL SL 2000 A F I N N MM01 ABCD1234 20101231105755999 2000 E
4	Introducing Firm and Clearing Firm execute	Special Routing Condition: Destination Code: Trade fills customer order ABCD12	M 34.
5	trade. Clearing Firm submits a FINRA transaction	Trade report includes OATS Trade ID DEFG4568.	
6	reporting system report. Clearing Firm submits Combined Order/Execution Report to OATS.	Combined Order/Execution Report includes: Order Receiving Firm MPID: Order Received Date: Order Receiving Firm Order ID: Routing Firm MPID: Routed Order ID: Order Received Timestamp: Received Method Code: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Receiving Department ID: Originating Department ID: Order Origination Code: Account Type Code: Member Type Code: ATS Display Indicator: Desk Timestamp: Desk Type Code: Execution Timestamp:	sample data MM01 20101231105755999 DEFG4568 FIRM ABCD1234 20101231105755999 E ORCL SL 2000 T W I M 20101231105858345
		OATS Trade ID: Execution Quantity:	DEFG4568 2000

OATS REPORTING TECHNICAL SPECIFICATIONS

ORDER REPORTING

Ref	Event	Event Details	
		Trader Terminal ID:	TERM00392
		Market Center ID:	L
		Execution Price:	31.00
		Capacity Code:	P

4.4.19 Order Received by Non-Reporting Member and Immediately Sent to Clearing Firm

This scenario illustrates the reporting requirements to OATS when an introducing firm, that does **NOT** meet the definition of a reporting member pursuant to FINRA Rule 7410, receives a customer order and immediately enters the customer's order into the clearing firm's system. In this scenario, the clearing firm would report the following:

- 1. The receipt of the order by the clearing firm.
- 2. The execution of the order.

The order receipt time would be the time the order was received from the introducing firm.

Furthermore, this scenario illustrates the following additional details:

- 1. The clearing firm must indicate that the order was received from a member firm that does not meet the definition of reporting member. The clearing firm would populate the Member Type Code with 'E', and the Routing Firm MPID would be populated with the introducing firm's MPID.
- 2. When reporting to a FINRA transaction reporting system, the clearing firm is required to submit a unique identifier (e.g., Branch Sequence Number, Compliance ID) for the purpose of matching to the related OATS Execution Report. The clearing firm must also submit this unique identifier as the OATS Trade ID on the Combined Order/Execution Report. The unique identifier is used to match the trade report to the related OATS Execution or Combined Order/Execution Report.

Customer

1)Submits Order

Introducing Firm

2) Enters order (acting as a Market Maker)

Transaction Reporting System

5) Submits Combined OrderExecution
Report

OATS

Figure 4-19. Order Received by Non-Reporting Member and Immediately Sent to Clearing Firm

- 1. Introducing Firm immediately sends the order to Clearing Firm.
- 2. The order was received directly by the desk/department that handled the order.
- 3. The order is executed on a principal basis.
- 4. The trade is reported to the FINRA/NASDAQ Trade Reporting Facility.

Table 4-20. Order Received by Non-Reporting Member and Immediately Sent to Clearing Firm, Event Listing

Ref	Event	Event Details	
1	Introducing Firm receives order from customer.	Market sell order for 2,000 shares of	of ORCL.
2	Introducing Firm enters order into Clearing Firm's system.	Market sell order for 2,000 shares of ORCL.	
3	Introducing Firm and clearing firm execute trade.	Trade fills customer order ABCD1234.	
4	Clearing Firm submits a FINRA transaction reporting system report.	Report includes DEFG4568 as the unique identifier.	
5	Clearing Firm submits Combined Order/Execution Report to OATS.	Combined Order/Execution Report sample data includes: Order Receiving Firm MPID: MM01 Order Received Date: 20101231105858321	
		Order Receiving Firm Order ID: Routing Firm MPID: Routed Order ID:	DEFG4568 FIRM JKL789
		Order Received Timestamp: Received Method Code:	20101231105858321 E
		Issue Symbol ID: Buy/Sell Code:	ORCL SL
		Shares Quantity: Receiving Department ID:	2000 T
		Originating Department ID:	-
		Order Origination Code: Account Type Code:	W I
		Member Type Code: ATS Display Indicator: Desk Timestamp: Desk Type Code:	E
		Execution Timestamp: OATS Trade ID:	20101231105859999 DEFG4568
		Execution Quantity:	2000
		Trader Terminal ID: Market Center ID:	TERM00392 L
		Execution Price:	31.00
		Capacity Code:	P

4.4.20 Direct Order Routing via a Clearing Firm's System

This scenario illustrates the reporting requirements to OATS when an introducing firm, that meets the definition of Reporting Member under FINRA Rule 7410, receives a customer order and enters it into its clearing firm's system. The introducing firm directs the order to a market center, other than the clearing firm, for further handling or execution.

The introducing firm would report the following:

- 1. The receipt of the order from the customer.
- 2. The route of the order to the market center.

The clearing firm would have no reporting responsibility.

The market center would report the following:

- 1. The receipt of the order from the introducing firm.
- 2. The execution of the order.

The introducing firm's order receipt time is the time the order is received from the customer. The market center's time is the time the order is received from the introducing firm.

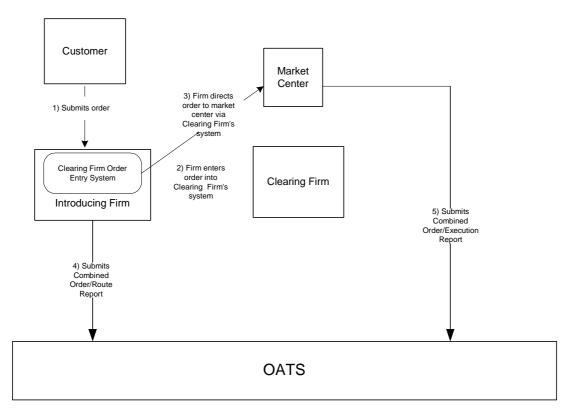


Figure 4-20. Direct Order Routing via a Clearing Firm's System

- 1. The Introducing Firm is responsible for OATS reporting, even if some other entity such as a clearing firm acts as its reporting agent.
- 2. The order was received directly by the desk/department that handled the order.
- 3. The customer order is routed on an agency basis.
- 4. The Clearing Firm does not direct the introducing firm's order.

Table 4-21. Direct Order Routing via a Clearing Firm's System, Event Listing

Ref	Event	Event Details	
1	Introducing Firm receives order from customer.	Market sell order for 2,000 shares of ORCL.	
2	Introducing Firm enters order into Clearing Firm's system.	Market sell order for 2,000 shares of ORCL.	
3	Introducing Firm directs order to Market Center via Clearing Firm's system.		
4	Introducing Firm submits a Combined Order/Route Report.	Combined Order/Route Report samp Order Receiving Firm MPID: Order Received Date: Order Received Timestamp: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Receiving Department ID: Originating Department ID: Order Origination Code: Account Type Code: Received Method Code: Member Type Code: ATS Display Indicator: Desk Timestamp: Desk Type Code:	ole data includes: FIRM 20101231105755999 ABCD1234 20101231105755999 ORCL SL 2000 T F I E N
		Sent to Firm MPID: Sent to Routed Order ID: Order Sent Timestamp: Routed Shares Quantity: Routing Method Code: Special Routing Condition: Destination Code:	MM01 ABCD1234 20101231105756454 2000 E
5	The Market Center executes the order and submits Combined Order/Execution Report to OATS.	Combined Order/Execution Report so Order Receiving Firm MPID: Order Received Date: Order Receiving Firm Order ID: Routing Firm MPID: Routed Order ID: Order Received Timestamp: Received Method Code: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Receiving Department ID: Originating Department ID: Order Origination Code: Account Type Code: Member Type Code: ATS Display Indicator: Desk Timestamp: Desk Type Code: Execution Timestamp: OATS Trade ID: Execution Quantity: Trader Terminal ID: Market Center ID: Execution Price: Capacity Code:	ample data includes:

4.4.21 Order Routing via an Algorithm Provided by the Clearing Firm

This scenario illustrates the reporting requirements to OATS when an introducing firm, that meets the definition of Reporting Member under FINRA Rule 7410, receives a customer order and enters it into its clearing firm's system. The clearing firm's system then directs the order to a destination market center for execution. The introducing firm does not make a determination as to where the order is routed. Rather, the clearing firm's system automatically determines the routing destination based on pre-established criteria developed by the clearing firm. Further, the clearing firm identifies itself as the routing firm for purposes of SEC Rule 606 (formerly SEC Rule 11Ac1-6).

The introducing firm would report the following:

- 1. The receipt of the order from the customer.
- 2. The route of the order to the clearing firm.

The clearing firm would report the following:

- 1. The receipt of the order from the introducing firm.
- 2. The route of the order to the destination market center.

The destination market center would report the following (assuming it is a Reporting Member):

- 1. The receipt of the order from the clearing firm.
- 2. The execution of the order.

The introducing firm's order receipt time is the time the order is received from the customer. The clearing firm's order receipt time is the time the order is entered into its system.

Customer 1) Submits order 4) Clearing Firm's Enters order into Clearing Clearing Firm Destination Clearing Firm Order system determines Algorithmic Trading Market Entry System where the order is Firm's system System Center Introducing Firm Clearing Firm 6) Submits 5) Submits Combined 3) Submits Combined Combined Order/Route Order/Execution Order/Route Report **OATS**

Figure 4-21. Order Routing via an Algorithm Provided by the Clearing Firm

- 1. The Introducing Firm is responsible for OATS reporting, even if some other entity such as a clearing firm acts as its reporting agent.
- 2. The order was received directly by the desk/department that handled the order.
- 3. The customer order is routed on an agency basis.
- 4. The Destination Market Center is an ECN.

Table 4-22. Order Routing via an Algorithm Provided by the Clearing Firm

Ref	Event	Event Details	
1	Introducing firm receives order from customer.	Market sell order for 2,000 shares of ORCL.	
2	Introducing Firm enters order into Clearing Firm's system.	Market sell order for 2,000 shares of	ORCL.
3	Introducing Firm submits Combined	Combined Order/Route Report sample data includes:	
	Order/Route Report to OATS.	Order Receiving Firm MPID:	FIRM
		Order Received Date:	20101231105755454
		Order Receiving Firm Order ID:	ABCD1234
		Order Received Timestamp:	20101231105755454
		Issue Symbol ID:	ORCL
		Buy/Sell Code: Shares Quantity:	SL 2000
		Receiving Department ID:	T
		Originating Department ID:	1
		Order Origination Code:	F
		Account Type Code:	Ī
		Received Method Code:	E
		Member Type Code:	N
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	
		Sent to Firm MPID:	MM01
		Sent to Routed Order ID:	ABCD1234
		Order Sent Timestamp:	20101231105755999
		Routed Shares Quantity:	2000
		Routing Method Code:	E
		Special Routing Condition:	3.6
4	Classica Finns's assets and determines subsure the	Destination Code:	M
4	Clearing Firm's system determines where the order is routed.	Clearing Firm routes 2,000 shares of	
5	Clearing Firm submits Combined Order/Route	Combined Order/Route Report samp	
	Report to OATS.	Order Receiving Firm MPID: Order Received Date:	MM01 20101231105755999
		Order Received Date. Order Receiving Firm Order ID:	DEF456
		Order Received Timestamp:	20101231105755999
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	2000
		Receiving Department ID:	A
		Originating Department ID:	
		Order Origination Code:	W
		Account Type Code:	I
		Received Method Code:	E
		Member Type Code:	M ABCD1224
		Routed Order ID:	ABCD1234
		Routing Firm MPID: ATS Display Indicator:	FIRM
		Desk Timestamp:	
		Desk Type Code:	
		Sent to Firm MPID:	ECN1
		Sent to Routed Order ID:	DEF456
		Order Sent Timestamp:	20101231105756233
		Routed Shares Quantity:	2000
		Routing Method Code:	E
		Special Routing Condition:	
		Destination Code:	E

ORDER REPORTING

Ref	Event	Event Details	
6	Destination Market Center executes order and	Combined Order/Execution sample	data includes:
	submits Combined Order/Execution Report to	Order Receiving Firm MPID:	ECN1
	OATS.	Order Received Date:	20101231105756233
		Order Receiving Firm Order ID:	GHI789
		Order Received Timestamp:	20101231105756233
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	2000
		Receiving Department ID:	ATS
		Originating Department ID:	
		Order Origination Code:	W
		Account Type Code:	I
		Member Type Code:	M
		ATS Display Indicator:	Y
		Routed Order ID:	DEF456
		Routing Firm MPID:	MM01
		Desk Timestamp:	
		Desk Type Code:	
		Execution Timestamp:	20101231105757999
		OATS Trade ID:	GHI789
		Execution Quantity:	2000
		Trader Terminal ID:	TERM00392
		Market Center ID:	L
		Execution Price:	31.00
		Capacity Code:	A

4.4.22 Smart-Order Routers and Other Order Routing Services Provided by Members

Members that provide other FINRA members smart order routers and other order routing services generally are required to report OATS information for orders routed through these systems, except under the following circumstances:

- 1. The member providing the order routing system has no discretion over the order once it is entered into the member's order-routing system. The order routing destination ("Destination Market Center") must either be directed by the originating member or be subject to the pre-determined algorithm of the routing system agreed to by the originating member. The member providing the order routing system would have no involvement relating to the routing of the order, other than providing the routing mechanism.
- 2. The originating member must have established a relationship with the Destination Market Center, including meeting any and all applicable requirements to route orders to that destination. The originating member understands that the member providing the order routing system has no involvement with respect to the order in any way, except for providing a routing mechanism. No pre-established relationship between the member providing the order routing system and the Destination Market Center would be necessary for the originating member to access the routing destination.
- 3. The Destination Market Center views the order as coming directly from the originating member, not the member providing the order routing system, for all purposes, including, but not limited to, OATS reporting, trade reporting, applicable fees, etc.
- 4. The originating member, rather than the member providing the order routing system, identifies itself as the routing firm for purposes of SEC Rule 606 (formerly SEC Rule 11Ac1-6).

This scenario illustrates the reporting requirements to OATS when an introducing firm that meets the definition of Reporting Member under FINRA Rule 7410 enters an order into a Smart Router provided by another member firm that meets the conditions noted above. In this scenario, the introducing firm would report the following:

- 1. The receipt or origination of the order.
- 2. The route to the Destination Market Center determined by the Smart Router.

The Destination Market Center, assuming it is a Reporting Member, would report the following:

- 1. The receipt or the order from the introducing firm.
- 2. The execution (or any other action) of the order.

Figure 4-22. Smart-Order Routers and Other Order Routing Services Provided by Members

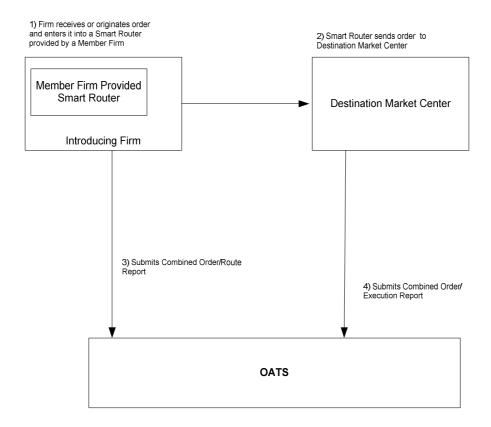


Table 4-23. Smart-Order Routers and Other Order Routing Services Provided by Members

Ref	Event	Event Details	
1	Firm receives or originates an order and enters it into a Smart Router provided by a Member Firm.	Market sell order for 2,000 shares of ORCL.	
2	Smart Router sends order to destination market center.	Market sell order for 2,000 shares of ORCL.	
3	Introducing Firm submits Combined	Combined Order/Route Report sample data includes:	
	Order/Route Report to OATS.	Order Receiving Firm MPID:	MM01
		Order Received Date:	20101231105755999
		Order Receiving Firm Order ID:	DEF456
		Order Received Timestamp:	20101231105755999
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	2000
		Receiving Department ID:	A
		Originating Department ID:	
		Order Origination Code:	F
		Account Type Code:	A
		Received Method Code:	E
		Member Type Code:	N
		Routed Order ID:	
		Routing Firm MPID:	
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	
		Sent to Firm MPID:	DM01
		Sent to Routed Order ID:	DEF456
		Order Sent Timestamp:	20101231105756454
		Routed Shares Quantity:	2000
		Routing Method Code:	S
		Special Routing Condition:	
		Destination Code:	M

ORDER REPORTING

Ref	Event	Event Details	
4	Destination Market Center executes order and	Combined Order/Execution sample	data includes:
	submits Combined Order/Execution Report to	Order Receiving Firm MPID:	DM01
	OATS.	Order Received Date:	20101231105756454
		Order Receiving Firm Order ID:	GHI789
		Order Received Timestamp:	20101231105756454
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	2000
		Receiving Department ID:	ATS
		Originating Department ID:	
		Order Origination Code:	W
		Account Type Code:	U
		Member Type Code:	M
		ATS Display Indicator:	
		Routed Order ID:	DEF456
		Routing Firm MPID:	MM01
		Desk Timestamp:	
		Desk Type Code:	
		Execution Timestamp:	20101231105757999
		OATS Trade ID:	GHI789
		Execution Quantity:	2000
		Trader Terminal ID:	TERM00392
		Market Center ID:	L
		Execution Price:	31.00
		Capacity Code:	A

4.4.23 Order Modification and Subsequent Execution

This scenario illustrates the reporting requirements to OATS when a customer modifies an existing order and the modified order is subsequently executed. In this scenario, the member firm is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The modification of the order by the customer.
- 3. The execution of the order.

Furthermore, this scenario illustrates the following details:

- 1. Modifications to existing orders are reported to OATS on the Cancel/Replace Report.
- 2. The Cancel/Replace Report requires the member firm to submit a new Order ID for the replacement order.
- 3. When reporting to a FINRA transaction reporting system, the member firm is required to submit a unique identifier (e.g., Branch Sequence Number, Compliance ID) for the purpose of matching to the related OATS Execution Report. The firm must also submit this unique identifier as the OATS Trade ID on the Combined Order/Execution Report. The unique identifier is used to match the trade report to the related OATS Execution or Combined Order/Execution Report

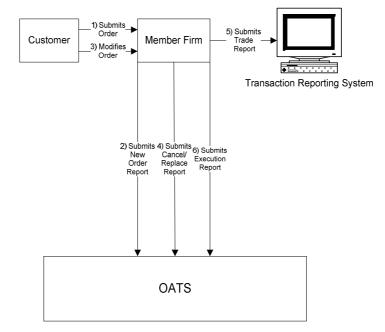


Figure 4-23. Order Modification and Subsequent Execution

- 1. The order was received directly by the desk/department that handled the order.
- 2. The order is executed on a principal basis.
- 3. The trade is reported to the FINRA/NYSE Trade Reporting Facility.

Table 4-24. Order Modification and Subsequent Execution, Event Listing

Ref	Event	Event Details	
1	Member Firm receives order from customer.	Limit sell order for 2,000 shares of 0	
2	Member Firm submits New Order Report to OATS.	New Order Report sample data inclu Order Receiving Firm MPID:	ides: MM01
		Order Received Date:	20101231102033245
		Order Receiving Firm Order ID:	ABC123
		Order Received Timestamp:	20101231102033245
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	2000
		Limit Price:	31.00
		Time in Force Code:	GTC
		Receiving Department ID:	T
		Originating Department ID:	
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	21 00
3	Customer modifies order.	Limit sell order for 2,500 shares of 0	
4	Member Firm submits a Cancel/Replace Report	Cancel/Replace Report sample data	includes:
	to OATS.	Cancel Portion	MM01
		Order Receiving Firm MPID:	MM01
		Replaced Order Received Date:	20101231102033245
		Replaced Firm Order ID:	ABC123
		Modified by Flag:	С
		Replace Portion	20101221102555000
		Order Received Date:	20101231103555999
		Order Receiving Firm Order ID:	DEF456
		Order Received Timestamp:	20101231103555999
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL 2500
		Shares Quantity: Limit Price:	31.00
		Time in Force Code:	GTC
		Receiving Department ID:	T
		Originating Department ID:	1
		Order Origination Code:	F
		Account Type Code:	Ī
		Member Type Code:	N
		ATS Display Indicator:	•
5	Member Firm submits a trade to the	Trade report includes DEF456 as the	e unique identifier.
	FINRA/NYSE Trade Reporting Facility.		
6	Member Firm submits Execution Report to	Execution Report sample data include	
	OATS.	Order Receiving Firm MPID:	MM01
		Order Received Date:	20101231103555999
		Order Receiving Firm Order ID:	DEF456
		Execution Timestamp:	20101231104557002
		OATS Trade ID:	DEF456
		Execution Quantity:	2500
		Trader Terminal ID:	TERM00392
		Issue Symbol ID:	ORCL

OATS REPORTING TECHNICAL SPECIFICATIONS

ORDER REPORTING

Ref	Event	Event Details	
		Execution Type Indicator:	F
		Market Center ID:	DN
		Execution Price:	31.00
		Capacity Code:	P

4.4.24 Customer Modification of a Previously Routed Order and Subsequent Execution

This scenario illustrates the reporting requirements to OATS when a customer modifies an existing and previously electronically routed order, and the modified order is subsequently executed. In this scenario, the member firm is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The route of the order to the market maker.
- 3. The modification of the order by the customer.
- 4. The route of the modified order to the market maker.

In this scenario, the market maker is required to report the following events to OATS:

- 1. The receipt of the order.
- 2. The modification of the order.
- 3. The execution of the order.

Furthermore, this scenario illustrates the following details:

- 1. Customer initiated modifications to existing orders are reported to OATS on the Cancel/Replace Report.
- 2. The market maker must capture the Routed Order ID and Firm MPID of the member firm and report this information on its New Order Report to OATS.
- 3. The Cancel/Replace Report requires the member firm and market maker to submit a new Order ID for the modified order.
- 4. The Cancel/Replace Report of the market maker must provide the new Routed Order ID associated with the member firm.
- 5. Only the market maker is required to report the execution to OATS.
- 6. When reporting to a FINRA transaction reporting system, the market maker is required to submit a unique identifier (e.g., Branch Sequence Number, Compliance ID) for the purpose of matching to the related OATS Execution Report. The market maker must also submit this unique identifier as the OATS Trade ID on the Combined Order/Execution Report. The unique identifier is used to match the trade report to the related OATS Execution or Combined Order/Execution Report.

NOTE: If a trader or trading software modifies the order as opposed to the customer, then the routing firm need not report beyond the initial route as long as the market maker or ECN reports the modification. For additional information, refer to OATS Report article titled: *Firm Responsibilities When Using "Intelligent" Order Routing Systems*, which is available at http://www.finra.org/oatsreport.

10) Executes Trade 7) Route odified Orde 1) Submits _2) Routes Order Market Member Firm Customer Maker 5) Modifies_ Trade 9) Submits Cancel/ Replace 3) Submits Combined Order/Route Report 6) Submits Cancel/ Replace 4) Submits New Order Execution Report Transaction Reporting System OATS

Figure 4-24. Customer Modification of a Previously Routed Order and Subsequent Execution

- 1. The order was received directly by the desk/department that handled the order.
- 2. The order was received and fully routed on the same day; otherwise, separate New Order and Route Reports must be used.
- 3. The customer order is routed on an agency basis.
- 4. The order is executed on a principal basis.
- 5. The trade is reported to the FINRA/NASDAQ Trade Reporting Facility.

Table 4-25. Customer Modification of a Previously Routed Order and Subsequent Execution, Event Listing

Ref	Event	Event Details	
1	Member Firm receives limit order from customer.	Limit sell order for 2,000 shares of C	DRCL at 31.00.
2	Member Firm routes order to Market Maker.	Sell order for 2,000 shares of ORCL is routed.	
3	Member Firm routes order to Market Maker. Member Firm submits Combined Order/Route Report to OATS.	Combined Order/Route Report samp Order Receiving Firm MPID: Order Received Date: Order Received Timestamp: Received Method Code: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Limit Price: Time in Force Indicator: Receiving Department ID: Order Originating Department ID: Order Origination Code: Account Type Code: Member Type Code: ATS Display Indicator: Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Routed Order ID:	ole data includes: FIRM 20101231000000000 ABC123 20101231110203132 E ORCL SL 2000 31.00 GTC T F I N MM01 ABC123
4	Market Maker submits New Order Report to OATS.	Order Sent Timestamp: Routed Shares Quantity: Routing Method Code: Special Routing Condition: Destination Code: New Order Report sample data inclu Order Receiving Firm MPID: Order Received Date: Order Receiving Firm Order ID: Routing Firm MPID: Routed Order ID: Order Received Timestamp: Received Method Code: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Limit Price: Time in Force Indicator: Receiving Department ID: Order Originating Department ID: Order Origination Code: Account Type Code: ATS Display Indicator: Desk Timestamp: Desk Type Code:	20101231110203999 2000 E M ddes: MM01 20101231000000000 DEF456 FIRM ABC123 20101231110203999 E ORCL SL 2000 31.00 GTC T W U M
5	Customer modifies the order.	Limit sell order for 2,500 shares of C	ORCL.

ORDER REPORTING

Ref	Event	Event Details	
6	Member Firm submits a Cancel/Replace	Cancel/Replace Report sample data	includes:
	Report to OATS.	Cancel Portion	
		Order Receiving Firm MPID:	FIRM
		Replaced Order Received Date:	20101231000000000
		Replaced Firm Order ID:	ABC123
		Modified by Flag:	C
		Replace Portion	
		Order Received Date:	20101231000000000
		Order Receiving Firm Order ID:	GHI789
		Order Received Timestamp:	20101231110300662
		Received Method Code:	Е
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	2500
		Receiving Department ID:	T
		Originating Department ID:	
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		ATS Display Indicator:	
7	Member Firm routes modified order to Market	Limit sell order for 2,500 shares of C	ORCL.
	Maker.		
8	Member Firm submits Route Report.	Route Report sample data includes:	
		Order Receiving Firm MPID:	FIRM
		Order Received Date:	20101231000000000
		Order Receiving Firm Order ID:	GHI789
		Sent to Firm MPID:	MM01
		Routed Order ID:	GHI789
		Issue Symbol ID:	ORCL
		Order Sent Timestamp:	20101231110300999
		Routed Shares Quantity:	2500
		Routing Method Code:	E
		Special Routing Condition:	
		Destination Code:	M

ORDER REPORTING

Event	Event Details	
Market Maker submits Cancel/Replace Report	Cancel/Replace Report sample data	includes:
to OATS.	Cancel Portion	
	Order Receiving Firm MPID:	MM01
	Replaced Order Received Date:	20101231000000000
		DEF456
	Modified by Flag:	С
	Replace Portion	
		20101231000000000
		JKL234
	,	20101231110301004
		FIRM
	_	GHI789
		E
		ORCL
		SL
		2500
		31.00
		T
	Order Origination Code:	W
	Account Type Code:	U
	Member Type Code:	M
	ATS Display Indicator:	
Member Firm and Market Maker execute	Trade fills firm order JKL234, there	by filling customer
trade.	order GHI789.	
Market Maker submits a FINRA transaction	Trade report includes JKL234 as the	unique identifier.
	Execution Report sample data include	les:
		MM01
	,	20101231000000000
		JKL234
		20101231110305999
		JKL234
		2500
		TERM00392
		ORCL
	•	F
	Market Center ID:	L
	Execution Price:	31.00
	Capacity Code:	P
	Market Maker submits Cancel/Replace Report to OATS. Member Firm and Market Maker execute trade.	Market Maker submits Cancel/Replace Report to OATS. Cancel Portion Order Received Date: Replaced Order Received Date: Replaced Firm Order ID: Modified by Flag: Replace Portion Order Received Date: Order Received Date: Order Received Date: Order Received Timestamp: Routing Firm MPID: Routed Order ID: Received Method Code: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Limit Price: Receiving Department ID: Order Originating Department ID: Order Originating Department ID: Order Origination Code: Account Type Code: Member Type Code: Member Type Code: ATS Display Indicator: Trade fills firm order JKL234, thereforder GHI789. Market Maker submits a FINRA transaction reporting system report. Market Maker submits Execution Report to OATS. Execution Report sample data include Order Received Date: Order Received Date: Order Receiving Firm MPID: Order Receiving Firm Order ID: Execution Timestamp: OATS Trade ID: Execution Timestamp: OATS Trade ID: Execution Type Indicator: Market Center ID: Execution Type Indicator: Market Center ID: Execution Price:

4.4.25 Customer Modification of a Previously Routed Order to a National Securities Exchange

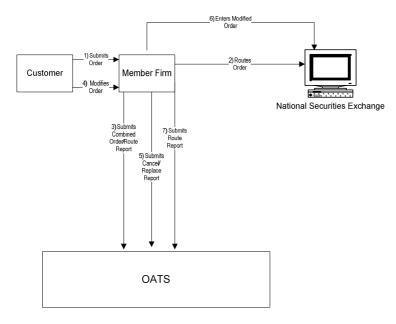
This scenario illustrates the reporting requirements to OATS when a customer modifies an existing and previously electronically routed order to a national securities exchange. In this scenario, the member firm is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The route of the order to a national securities exchange.
- 3. The modification of the order by the customer.
- 4. The entry of the modified order to the national securities exchange.

Furthermore, this scenario illustrates the following details:

- 1. Customer initiated modifications to existing orders are reported to OATS on the Cancel/Replace Report.
- 2. The subsequent Route Report contains a new Routed Order ID.

Figure 4-25. Customer Modification of a Previously Routed Order to a National Securities Exchange



- 1. The order was received directly by the desk/department that handled the order.
- 2. The member firm initially receives and routes the order in full on the same day; otherwise, separate New Order and Route Reports must be used.
- 3. The customer order is routed on an agency basis.

Table 4-26. Customer Modification of a Previously Routed Order to a National Securities Exchange, Event Listing

Member Firm receives order from customer. Sell order for 2,000 shares of ORCL	1			Event Details	
Sell order for 2,000 shares of ORCL is routed.	1	Member Firm receives order from customer.			
Combined Order/Route Report sample data includes: Route Report to OATS.		-			
Order Received Date: 2010123100000 Order Receiving Firm Order ID: ABC123 Order Received Timestamp: 2010123111020 Received Method Code: E Issue Symbol ID: ORCL Buy/Sell Code: SL Shares Quantity: 2000 Limit Price: 31.00 Time in Force Indicator: GTC Receiving Department ID: A Originating Department ID: A Originating Department ID: Order Origination Code: F Account Type Code: I Member Type Code: N ATS Display Indicator: Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Firm MPID: Sent to Routed Order ID: ABC123 Order Sent Timestamp: 2010123111020 Routed Shares Quantity: 2000 Routing Method Code: E Special Routing Condition: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL.	3	Member Firm submits Combined Order/			
Order Receiving Firm Order ID: ABC123 Order Received Timestamp: 2010123111020 Received Method Code: E Issue Symbol ID: ORCL Buy/Sell Code: SL Shares Quantity: 2000 Limit Price: 31.00 Time in Force Indicator: GTC Receiving Department ID: A Originating Department ID: Order Origination Code: F Account Type Code: I Member Type Code: N ATS Display Indicator: Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Firm MPID: Sent to Routed Order ID: ABC123 Order Sent Timestamp: 2010123111020 Routed Shares Quantity: 2000 Routing Method Code: E Special Routing Condition: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL.		Route Report to OA13.			
Order Received Timestamp: 2010123111020 Received Method Code: E Issue Symbol ID: ORCL Buy/Sell Code: SL Shares Quantity: 2000 Limit Price: 31.00 Time in Force Indicator: GTC Receiving Department ID: A Originating Department ID: Order Origination Code: F Account Type Code: I Member Type Code: N ATS Display Indicator: Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Routed Order ID: ABC123 Order Sent Timestamp: 2010123111020 Routed Shares Quantity: 2000 Routing Method Code: E Special Routing Condition: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL.					
Received Method Code: Issue Symbol ID: Buy/Sell Code: SL Shares Quantity: 2000 Limit Price: 31.00 Time in Force Indicator: GTC Receiving Department ID: Order Originating Department ID: Order Origination Code: F Account Type Code: I Member Type Code: N ATS Display Indicator: Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Fouted Order ID: ABC123 Order Sent Timestamp: 2010123111020 Routed Shares Quantity: 2000 Routing Method Code: E Special Routing Condition: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL. Cancel/Replace Report sample data includes:					
Issue Symbol ID: ORCL Buy/Sell Code: SL Shares Quantity: 2000 Limit Price: 31.00 Time in Force Indicator: GTC Receiving Department ID: A Originating Department ID: Order Origination Code: F Account Type Code: I Member Type Code: N ATS Display Indicator: Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Routed Order ID: ABC123 Order Sent Timestamp: 2010123111020 Routed Shares Quantity: 2000 Routing Method Code: E Special Routing Condition: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL.					
Buy/Sell Code: SL Shares Quantity: 2000 Limit Price: 31.00 Time in Force Indicator: GTC Receiving Department ID: A Originating Department ID: Order Origination Code: F Account Type Code: I Member Type Code: N ATS Display Indicator: Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Firm MPID: Sent to Routed Order ID: ABC123 Order Sent Timestamp: 2010123111020 Routed Shares Quantity: 2000 Routing Method Code: E Special Routing Condition: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL.					
Shares Quantity: 2000 Limit Price: 31.00 Time in Force Indicator: GTC Receiving Department ID: A Originating Department ID: Order Origination Code: F Account Type Code: I Member Type Code: N ATS Display Indicator: Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Firm MPID: Sent to Routed Order ID: ABC123 Order Sent Timestamp: 2010123111020 Routed Shares Quantity: 2000 Routing Method Code: E Special Routing Condition: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL.					
Limit Price: 31.00 Time in Force Indicator: GTC Receiving Department ID: A Originating Department ID: Order Origination Code: F Account Type Code: I Member Type Code: N ATS Display Indicator: Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Firm MPID: Sent to Routed Order ID: ABC123 Order Sent Timestamp: 2010123111020 Routed Shares Quantity: 2000 Routing Method Code: E Special Routing Condition: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL. 5 Member Firm submits a Cancel/Replace Cancel/Replace Report sample data includes:					
Receiving Department ID: A Originating Department ID: Order Origination Code: F Account Type Code: I Member Type Code: N ATS Display Indicator: Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Routed Order ID: ABC123 Order Sent Timestamp: 2010123111020 Routed Shares Quantity: 2000 Routing Method Code: E Special Routing Condition: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL. 5 Member Firm submits a Cancel/Replace Cancel/Replace Report sample data includes:					
Originating Department ID: Order Origination Code: F Account Type Code: I Member Type Code: N ATS Display Indicator: Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Routed Order ID: ABC123 Order Sent Timestamp: 2010123111020 Routed Shares Quantity: 2000 Routing Method Code: E Special Routing Condition: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL. 5 Member Firm submits a Cancel/Replace Cancel/Replace Report sample data includes:			Time in Force Indicator:	GTC	
Originating Department ID: Order Origination Code: F Account Type Code: I Member Type Code: N ATS Display Indicator: Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Routed Order ID: ABC123 Order Sent Timestamp: 2010123111020 Routed Shares Quantity: 2000 Routing Method Code: E Special Routing Condition: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL. 5 Member Firm submits a Cancel/Replace Cancel/Replace Report sample data includes:			Receiving Department ID:	A	
Account Type Code: Member Type Code: N ATS Display Indicator: Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Routed Order ID: ABC123 Order Sent Timestamp: 2010123111020 Routed Shares Quantity: Routing Method Code: E Special Routing Condition: Exchange Participant ID: Exchange			Originating Department ID:		
Member Type Code: N ATS Display Indicator: Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Routed Order ID: ABC123 Order Sent Timestamp: 2010123111020 Routed Shares Quantity: 2000 Routing Method Code: E Special Routing Condition: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL. 5 Member Firm submits a Cancel/Replace Cancel/Replace Report sample data includes:				F	
ATS Display Indicator: Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Routed Order ID: ABC123 Order Sent Timestamp: 2010123111020 Routed Shares Quantity: Routing Method Code: E Special Routing Condition: Exchange Participant ID: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL. 5 Member Firm submits a Cancel/Replace Cancel/Replace Report sample data includes:					
Desk Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Routed Order ID: ABC123 Order Sent Timestamp: 2010123111020 Routed Shares Quantity: Routing Method Code: E Special Routing Condition: Exchange Participant ID: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL. 5 Member Firm submits a Cancel/Replace Cancel/Replace Report sample data includes:				N	
Desk Type Code: Sent to Firm MPID: Sent to Routed Order ID: ABC123 Order Sent Timestamp: 2010123111020 Routed Shares Quantity: 2000 Routing Method Code: E Special Routing Condition: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL. 5 Member Firm submits a Cancel/Replace Cancel/Replace Report sample data includes:					
Sent to Firm MPID: Sent to Routed Order ID: ABC123 Order Sent Timestamp: 2010123111020 Routed Shares Quantity: 2000 Routing Method Code: E Special Routing Condition: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL. 5 Member Firm submits a Cancel/Replace Cancel/Replace Report sample data includes:					
Sent to Routed Order ID: ABC123 Order Sent Timestamp: 2010123111020 Routed Shares Quantity: 2000 Routing Method Code: E Special Routing Condition: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL. 5 Member Firm submits a Cancel/Replace Cancel/Replace Report sample data includes:					
Order Sent Timestamp: 2010123111020 Routed Shares Quantity: 2000 Routing Method Code: E Special Routing Condition: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL. 5 Member Firm submits a Cancel/Replace Cancel/Replace Report sample data includes:				A D.C.1.0.2	
Routed Shares Quantity: 2000 Routing Method Code: E Special Routing Condition: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL. 5 Member Firm submits a Cancel/Replace Cancel/Replace Report sample data includes:					
Routing Method Code: E Special Routing Condition: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL. 5 Member Firm submits a Cancel/Replace Cancel/Replace Report sample data includes:					
Special Routing Condition: Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL. 5 Member Firm submits a Cancel/Replace Cancel/Replace Report sample data includes:					
Exchange Participant ID: FIRM Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL. 5 Member Firm submits a Cancel/Replace Cancel/Replace Report sample data includes:				L	
Destination Code: XQ 4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL. 5 Member Firm submits a Cancel/Replace Cancel/Replace Report sample data includes:				FIRM	
4 Customer modifies the order. Limit sell order for 2,500 shares of ORCL. 5 Member Firm submits a Cancel/Replace Cancel/Replace Report sample data includes:					
5 Member Firm submits a Cancel/Replace Cancel/Replace Report sample data includes:	4	Customer modifies the order.			
Report to UA15. Cancel Portion		Report to OATS.	Cancel Portion		
Order Receiving Firm MPID: FIRM		•	Order Receiving Firm MPID:	FIRM	
Replaced Order Received Date: 2010123100000			Replaced Order Received Date:	20101231000000000	
Replaced Firm Order ID: ABC123				ABC123	
Modified by Flag: C			Modified by Flag:	C	
Replace Portion				2010122100000000	
				20101231000000000	
Order Receiving Firm Order ID: GHI789			\mathcal{E}		
Order Received Timestamp: 2010123111030 Received Method Code: E				20101231110300676	
Issue Symbol ID: ORCL					
Buy/Sell Code: SL					
Shares Quantity: 2500					
Order Origination Code: F					
Receiving Department ID: A					
Originating Department ID:			Originating Department ID:		
Account Type Code: I				I	
Member Type Code: N					
ATS Display Indicator:					

OATS REPORTING TECHNICAL SPECIFICATIONS

ORDER REPORTING

Ref	Event	Event Details	
6	Member Firm uses the NASDAQ Exchange	Sell order for 2,500 shares of ORCL	
	Single Book Cancel/Replace functionality and		
	cancels order ABC123 and replaces it with		
	order DEF456.		
7	Member Firm submits Route Report.	Route Report sample data includes:	
		Order Receiving Firm MPID:	FIRM
		Order Received Date:	20101231000000000
		Order Receiving Firm Order ID:	GHI789
		Sent to Firm MPID:	
		Routed Order ID:	DEF456
		Issue Symbol ID:	ORCL
		Order Sent Timestamp:	20101231110300974
		Routed Shares Quantity:	2500
		Routing Method Code:	E
		Special Routing Condition:	
		Exchange Participant ID:	FIRM
		Destination Code:	XQ

4.4.26 Order Cancellation in Full on Day of Receipt

This scenario illustrates firm reporting requirements to OATS when a customer cancels an order in full on the same OATS Business Day as the order was received. In this scenario, the member firm is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The cancellation of the order.

Because the order is received and cancelled on the same OATS Business Day, the two events must be reported on a single report to OATS.

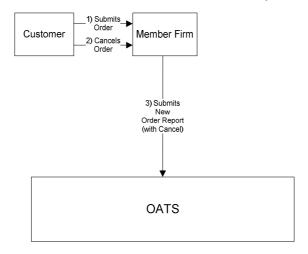


Figure 4-26. Order Cancellation in Full on Day of Receipt

1. The order was received directly by the desk/department that handled the order.

Table 4-27. Order Cancellation in Full on Day of Receipt, Event Listing

Ref	Event	Event Details	
1	Member Firm receives order from customer.	Limit sell order for 2,000 shares of ORCL at 31.00	
2	Customer cancels order.	Customer fully cancels limit sell order for 2,000 shares	
		of ORCL.	
3	Member Firm submits New Order Report with	New Order Report sample data includes:	
	Cancel information to OATS.	Order Receiving Firm MPID:	FIRM
		Order Received Date:	20101231000000000
		Order Receiving Firm Order ID:	ABC123
		Order Received Timestamp:	20101231102033999
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	2000
		Limit Price:	31.00
		Receiving Department ID:	T
		Originating Department ID:	
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	
		Order Cancel Timestamp:	20101231104355123
		Cancelled By Flag:	C

4.4.27 Order Cancellation in Full After Day of Receipt

This scenario illustrates firm reporting requirements to OATS when a customer cancels an order after the OATS Business Day when the order was received. In this example, the order was received on January 2 at 10:20:33, and cancelled on January 3 at 10:45:55. In this scenario, the member firm is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The cancellation of the order.

Because the order was cancelled after the day of receipt, a separate Cancel Report is used to report the cancellation.

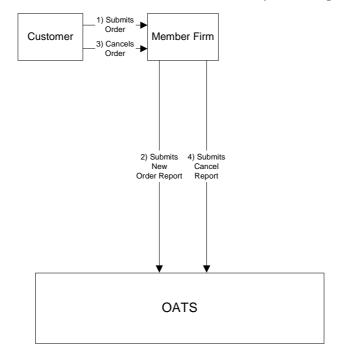


Figure 4-27. Order Cancellation in Full After Day of Receipt

1. The order was received directly by the desk/department that handled the order.

Table 4-28. Order Cancellation in Full After Day of Receipt, Event Listing

Ref	Event	Event Details	
1	Member Firm receives order from customer.	Limit sell order for 2,000 shares of ORCL at 31.00.	
2	Member Firm submits New Order Report to	New Order Report sample data includes:	
	OATS.	Order Receiving Firm MPID:	FIRM
		Order Received Date:	20100103000000000
		Order Receiving Firm Order ID:	ABC123
		Order Received Timestamp:	20100103102033999
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	2000
		Limit Price:	31.00
		Receiving Department ID:	T
		Originating Department ID:	
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	
3	Customer cancels order.	Customer fully cancels sell order for	r 2,000 shares of
		ORCL.	
4	Member Firm submits Cancel Report to OATS.	Cancel Report sample data includes	:
		Order Receiving Firm MPID:	FIRM
		Order Received Date:	20100103000000000
		Order Receiving Firm Order ID:	ABC123
		Issue Symbol ID:	ORCL
		Order Cancel Timestamp:	20110103104555678
		Cancel Type Flag:	F
		Cancel Quantity:	
		Leaves Quantity:	
		Cancelled By Flag:	C

4.4.28 Partial Cancellation of an Order

This scenario illustrates member firm reporting requirements to OATS when a customer partially cancels an order by reducing the order shares quantity. In this scenario, the member firm is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The partial cancellation of the order.
- 3. The execution of the remaining shares of the order.

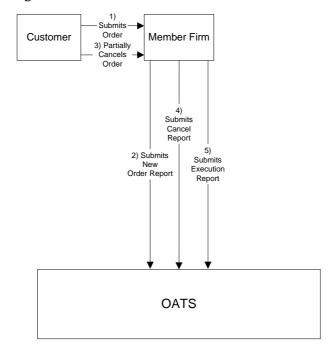


Figure 4-28. Partial Cancellation of an Order

- 1. The order was received directly by the desk/department that handled the order.
- 2. The order is executed on a principal basis.

Table 4-29. Partial Cancellation of an Order, Event Listing

Ref	Event	Event Details	
1	Member Firm receives order from customer.	Limit sell order for 2,000 shares of	ORCL at 31.00.
2	Member Firm submits New Order Report to	New Order Report sample data inclu	ıdes:
	OATS.	Order Receiving Firm MPID:	MM01
		Order Received Date:	20101231000000000
		Order Receiving Firm Order ID:	ABC123
		Order Received Timestamp:	20101231102033999
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	2000
		Limit Price:	31.00
		Receiving Department ID:	T
		Originating Department ID:	
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	
3	Customer partially cancels order.	Sell order reduced to 500 shares of 0	
4	Member Firm submits Cancel Report to OATS.	Cancel Report sample data includes	
		Order Receiving Firm MPID:	MM01
		Order Received Date:	20101231000000000
		Order Receiving Firm Order ID:	ABC123
		Issue Symbol ID:	ORCL
		Order Cancel Timestamp:	20101231104355766
		Cancel Type Flag:	P
		Cancel Quantity:	1500
		Cancel Leaves Quantity:	500
		Cancelled By Flag:	С
5	Member Firm submits Execution Report to	Execution Report sample data inclu	
	OATS.	Order Receiving Firm MPID:	MM01
		Order Received Date:	20101231000000000
		Order Receiving Firm Order ID:	ABC123
		Execution Timestamp:	20101231104555974
		OATS Trade ID:	ABC123
		Execution Quantity:	500
		Trader Terminal ID:	TERM00392
		Issue Symbol ID:	ORCL
		Execution Type Indicator:	F
		Market Center ID:	L 21.00
		Execution Price:	31.00
		Capacity Code:	P

4.4.29 Customer Cancellation of a Routed Order on Day of Receipt

This scenario illustrates the reporting requirements to OATS when the customer cancels an order after it has been electronically routed to a market maker. In this scenario, the member firm is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The route of the order to the market maker.
- 3. The cancellation of the order by the customer.

In this scenario, the market maker is required to report the following events to OATS:

- 1. The receipt of the routed order by the market maker.
- 2. The cancellation of the order.

Furthermore, this scenario illustrates that both member firm and market maker must report the order cancellation to OATS.

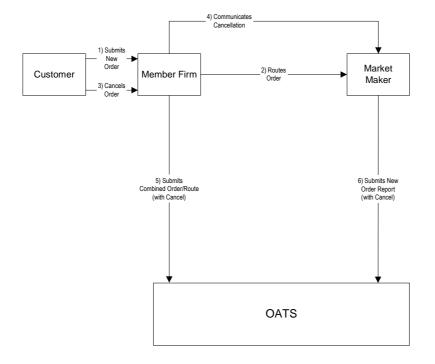


Figure 4-29. Customer Cancellation of a Routed Order on Day of Receipt

This scenario includes the following assumptions:

1. The order was received directly by the desk/department that handled the order.

Table 4-30. Customer Cancellation of a Routed Order on Day of Receipt, Event Listing

Ref	Event	Event Details	
1	Member Firm receives order from customer.	Market sell order for 2,000 shares of ORCL.	
2	Member Firm electronically routes order to Market Maker.	Sell order for 2,000 shares of ORCL	is routed.
3	Customer cancels order.	Customer fully cancels sell order for ORCL.	r 2,000 shares of
4	Member Firm communicates cancellation to Market Maker.		
5	Member Firm submits Combined Order/Route Report with cancel information to OATS.	Combined Order/Route Report samp Order Receiving Firm MPID: Order Received Date: Order Received Timestamp: Received Method Code: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Receiving Department ID: Originating Department ID: Order Origination Code: Account Type Code: Sent to Routed Order ID: Sent to Firm MPID: Order Sent Timestamp: Routed Shares Quantity: Routing Method Code: Special Routing Condition: Member Type Code: Destination Code: ATS Display Indicator: Desk Timestamp: Desk Type Code:	Pile data includes: FIRM 20101231105033999 ABC123 20101231105033999 E ORCL SL 2000 T F I ABC123 MM01 20101231105034346 2000 E N M
		Order Cancel Timestamp: Cancelled By Flag:	20101231110355971 C
6	Market Maker submits New Order Report with Cancel information to OATS.	New Order Report sample data inche Order Receiving Firm MPID: Order Received Date: Order Receiving Firm Order ID: Routing Firm MPID: Routed Order ID: Order Received Timestamp: Received Method Code: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Order Origination Code: Account Type Code: Member Type Code: ATS Display Indicator: Desk Timestamp: Desk Type Code: Order Cancel Timestamp: Cancelled By Flag:	ndes:

4.4.30 Desk Transmittal, External Route and Cancellation in Full on Day of Receipt

This scenario illustrates member firm reporting requirements to OATS for the cancellation of an order that was transmitted to the desk and then subsequently routed outside the member firm. The cancel was for the entire order and all subsequent events, including the cancel, occurred on the same day the order was received. In this scenario, the member firm is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. Transmittal of the order to the Trading Desk.
- 3. The external route of the order.
- 4. The cancellation of the order by the customer.

Member Firm 2 is required to report the following events:

- 1. The receipt of the order from Member Firm 1.
- 2. The cancellation of the order.

Figure 4-30. Desk Transmittal, External Route, and Cancellation in Full on Day of Receipt

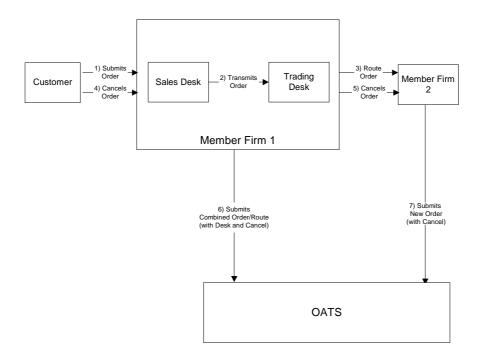


Table 4-31. Desk Transmittal, External Route, and Cancellation in Full on Day of Receipt, Event Listing

Ref	Event	Event Details	
1	Member Firm receives order from customer.	Market sell order for 2,000 shares of	
2	Trading Desk receives order from Member Firm 1 Sales Desk.	Member Firm 1 Sales Desk transmit ORCL to the Trading Desk.	s 2,000 shares of
3	Order is Routed to Member Firm 2.	Member Firm 1 electronically routes 2,000 shares of ORCL to Member Firm 2.	
4	Customer cancels entire order.	Customer fully cancels 2,000 shares of ORCL.	
5	Member Firm 1 notifies Member Firm 2 of cancellation.		
6	Member Firm 1 submits Combined Order/Route with Desk and Cancel information to OATS.	Combined Order/Route with Desk a sample data includes: Order Receiving Firm MPID: Order Received Date: Order Received Timestamp: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Receiving Department ID: Originating Department ID: Order Origination Code: Account Type Code: Received Method Code: Member Type Code: Desk Received Timestamp: Desk Type Code: Sent to Firm MPID: Sent to Routed Order ID: Order Sent Timestamp: Routed Shares Quantity:	FIRM 20101231105755432 ABCD1234 20101231105755432 ORCL SL 2000 A F A E N 20101231105756999 T MF02 ABCD1234 20101231105757432 2000
		Routed Shares Quantity: Routing Method Code: Special Routing Condition: Destination Code: Order Cancel Timestamp: Cancelled by Flag:	E M 20101231105800677 C
7	Member Firm 2 submits New Order with Cancel information to OATS.	New Order with Cancel Report samy Order Receiving Firm MPID: Order Received Date: Order Received Timestamp: Received Method Code: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Limit Price: Order Origination Code: Account Type Code: Member Type Code: Routed Order ID: Routing Firm MPID: Desk Timestamp: Desk Type Code: Order Cancel Timestamp: Cancelled By Flag:	-

4.4.31 Post Trade Allocation Reporting

This scenario illustrates the reporting requirements to OATS of a member firm that fills three customer orders via an agency post-trade allocation. In this scenario, the member firm is required to report the following events to OATS:

- 1. The receipt of the orders from the customers.
- 2. The allocation back to the customer via an Execution Report.

The market makers (Member Firm 1 and Member Firm 2) are required to report the following events to OATS:

- 1. The receipt of the orders from the customer.
- 2. The execution of the order.

Furthermore, this scenario illustrates the following:

- 1. The Execution Reports submitted by Firm A must reflect the allocation time and must include the Reporting Exception Code of 'T' to reflect post trade allocation.
- 2. Member Firm 1 and Member Firm 2 are required to send a Combined Order/Execution Report for each order.

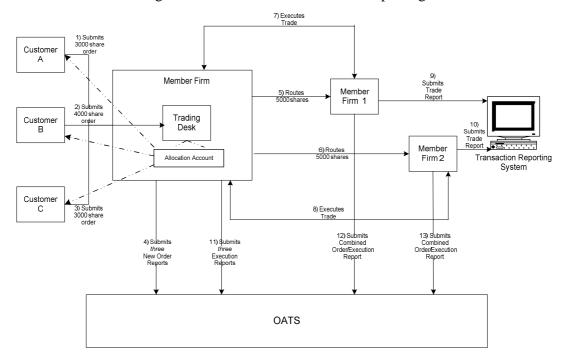


Figure 4-31. Post Trade Allocation Reporting

This scenario includes the following assumptions:

- 1. The trade is reported to the FINRA/NASDAQ Trade Reporting Facility.
- 2. The order was received directly by the desk/department that handled the order.

Table 4-32. Post Trade Allocation Reporting, Event Listing

Ref	Event	Event Details	
1	Member Firm receives order from Customer A.	Market sell order for 3,000 shares of ORCL.	
2	Member Firm receives order from Customer B.	Market sell order for 4,000 shares of	ORCL.
3	Member Firm receives order from Customer C.	Market buy order for 3,000 shares of ORCL.	
3 4	Member Firm receives order from Customer C. Member Firm submits three New Order Reports to OATS.	Market buy order for 3,000 shares o New Order Report sample data inclu Order Receiving Firm MPID: Order Received Date: Order Received Timestamp: Received Method Code: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Receiving Department ID: Order Origination Code: Account Type Code: Member Type Code: ATS Display Indicator: Desk Timestamp: Desk Type Code:	
		Order Receiving Firm MPID: Order Received Date: Order Received Timestamp: Received Method Code: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Receiving Department ID: Originating Department ID: Order Origination Code: Account Type Code: Member Type Code: ATS Display Indicator: Desk Timestamp: Desk Type Code:	FIRM 20101231102357222 DEF456 20101231102357222 E ORCL SL 4000 T
		Order Receiving Firm MPID: Order Received Date: Order Received Timestamp: Received Method Code: Issue Symbol ID: Buy/Sell Code: Shares Quantity: Receiving Department ID: Originating Department ID: Order Origination Code: Account Type Code: Member Type Code: ATS Display Indicator: Desk Timestamp: Desk Type Code:	FIRM 20101231102359333 GHI789 20101231102359333 E ORCL SL 3000 T
5	Member Firm routes order to Member Firm 1.	Firm A electronically routes 5,000 s	hares to Member

ORDER REPORTING

Ref	Event	Event Details	
		Firm 1.	
6	Member Firm routes order to Member Firm 2.	Firm A electronically routes 5,000 sl	hares to Member
		Firm 2.	
7	Member Firm 1 executes order.		
8	Member Firm 2 executes order.		
9	Member Firm 1 submits a trade to	Trade report includes Branch Sequence Number	
	FINRA/NASDAQ Trade Reporting Facility.	KLM123.	
10	Member Firm 2 submits a trade to	Trade report includes Branch Sequence Number	
	FINRA/NASDAQ Trade Reporting Facility.	NOP456.	
11	Member Firm submits three Execution Reports.	Execution Report sample data include	
		Order Receiving Firm MPID:	FIRM
		Order Received Date:	20101231102435111
		Order Receiving Firm Order ID:	ABC123
		Execution Timestamp:	20101231102435111
		OATS Trade ID:	TD.
		Reporting Exception Code:	T 3000
		Execution Quantity: Trader Terminal ID:	TERM00392
		Market Center ID:	L L
		Execution Price:	31.00
		Capacity Code:	A
		Capacity Code.	71
		Order Receiving Firm MPID:	FIRM
		Order Received Date:	20101231102435111
		Order Receiving Firm Order ID:	DEF456
		Execution Timestamp:	20101231102435111
		OATS Trade ID:	
		Reporting Exception Code:	T
		Execution Quantity:	4000
		Trader Terminal ID:	TERM00392
		Market Center ID:	L
		Execution Price:	31.00
		Capacity Code:	A
		Order Receiving Firm MPID:	FIRM
		Order Received Date:	20101231102435111
		Order Receiving Firm Order ID:	GHI789
		Execution Timestamp:	20101231102435111
		OATS Trade ID:	20101201102100111
		Reporting Exception Code:	T
		Execution Quantity:	3000
		Trader Terminal ID:	TERM00392
		Market Center ID:	L
		Execution Price:	31.00
		Capacity Code:	A
12	Member Firm 1 submits a Combined	Combined Order/Execution sample	•
	Order/Execution Report to OATS.	Order Receiving Firm MPID:	MM01
		Order Received Date:	20101231102418111
		Order Receiving Firm Order ID:	KLM123
		Order Received Timestamp:	20101231102418111 E
		Received Method Code: Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	5000
		Order Origination Code:	W
		Account Type Code:	I
		Member Type Code:	M
		monioci Type Code.	171

ORDER REPORTING

Ref	Event	Event Details	
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	
		Execution Timestamp:	20101231102420543
		OATS Trade ID:	KLM123
		Execution Quantity:	5000
		Trader Terminal ID:	TERM00392
		Market Center ID:	L
		Execution Price:	31.00
		Capacity Code:	P
13	Member Firm 2 submits a Combined	Combined Order/Execution sample	report includes:
	Order/Execution Report to OATS.	Order Receiving Firm MPID:	MM02
		Order Received Date:	20101231102417111
		Order Receiving Firm Order ID:	NOP456
		Order Received Timestamp:	20101231102417111
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	5000
		Order Origination Code:	W
		Account Type Code:	I
		Member Type Code:	M
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	
		Execution Timestamp:	20101231102422666
		OATS Trade ID:	NOP456
		Execution Quantity:	5000
		Trader Terminal ID:	TERM00392
		Market Center ID:	L
		Execution Price:	31.00
		Capacity Code:	P

4.4.32 Reserve Size Orders

A reserve size order is an order for which a customer has authorized the public display of part of the full size of the order with the remainder held in reserve on an undisplayed basis to be displayed in whole or in part as the displayed part is executed.

This scenario illustrates the reporting requirements relating to reserve size orders. In this scenario, a member firm receives an 11,000 share order with a displayed size of 1,000 shares and a reserve size of 10,000 shares. Two 1,000 share executions occur, leaving a displayed size of 1,000 shares and a reserve size of 9,000 shares. The member firm is required to report the following events to OATS:

- 1. The receipt of the reserve size order from the member firm
- 2. Executions to the reserve size order.

Furthermore, this scenario illustrates the following details:

- 1. The Shares Quantity on the New Order Report is the total of the displayed size and the reserve size. In this example, the Shares Quantity of the initial order is 11,000 (1,000 displayed size + 10,000 reserve size).
- 2. The Special Handling Code of 'RSV' must be reported for reserve size orders.
- 3. When reporting to a FINRA transaction reporting system, the Member Firm is required to submit a unique identifier (e.g., Branch Sequence Number, Compliance ID) for the purpose of matching to the related OATS Execution Report. The firm must also submit this unique identifier as the OATS Trade ID on the Combined Order/Execution Report. The unique identifier is used to match the trade report to the related OATS Execution or Combined Order/Execution Report.

Member Firm

1) Submits Reserve Size Order

Member Firm

2) Submits Trade Report

New Order Report

New Order Report

OATS

OATS

Figure 4-32. Reserve Size Orders

This scenario includes the following assumptions:

- 1. The order was received directly by the desk/department that handled the order.
- 2. The trades are reported to the FINRA/NASDAQ Trade Reporting Facility.

Table 4-33. Reserve Size Orders, Event Listing

1 Member Firm submits reserve size order to Sell 11,000 shares of ORCL at 31.00 Displayed size of 1,000; reserved size of 10,000. 2 Member Firm submits New Order Report to OATS. New Order Report sample data includes: Order Received Date: Order Received Date: Order Received Time MPID: FRM1 Order Received Timestamp: Received Method Code: E Issue Symbol ID: Buy/Sell Code: Shares Quantity: New Order Reserve size order to sell 11,000 shares of ORCL at 31.00 Displayed size of 1,000; reserved size of 10,000. New Order Report sample data includes: Order Received Date: 2010123110203399 Received Timestamp: 2010123110203399 Received Method Code: E Issue Symbol ID: Shares Quantity: 11000	
2 Member Firm submits New Order Report to OATS. New Order Report sample data includes: Order Receiving Firm MPID: Order Received Date: Order Receiving Firm Order ID: ABC123 Routing Firm MPID: FRM1 Order Received Timestamp: Received Method Code: E Issue Symbol ID: Buy/Sell Code: SL	9
Report to OATS. Order Receiving Firm MPID: FIRM Order Received Date: 2010123110203399 Order Receiving Firm Order ID: ABC123 Routing Firm MPID: FRM1 Order Received Timestamp: 2010123110203399 Received Method Code: E Issue Symbol ID: ORCL Buy/Sell Code: SL	9
Order Received Date: 2010123110203399 Order Receiving Firm Order ID: ABC123 Routing Firm MPID: FRM1 Order Received Timestamp: 2010123110203399 Received Method Code: E Issue Symbol ID: ORCL Buy/Sell Code: SL	9
Order Receiving Firm Order ID: ABC123 Routing Firm MPID: FRM1 Order Received Timestamp: 2010123110203399 Received Method Code: E Issue Symbol ID: ORCL Buy/Sell Code: SL	9
Routing Firm MPID: FRM1 Order Received Timestamp: 2010123110203399 Received Method Code: E Issue Symbol ID: ORCL Buy/Sell Code: SL	
Order Received Timestamp: 2010123110203399 Received Method Code: E Issue Symbol ID: ORCL Buy/Sell Code: SL	
Received Method Code: E Issue Symbol ID: ORCL Buy/Sell Code: SL	
Issue Symbol ID: ORCL Buy/Sell Code: SL	9
Buy/Sell Code: SL	
Shares Quantity: 11000	
Limit Price: 31.00	
Time in Force Code: DAY	
Receiving Department ID: ATS	
Originating Department ID:	
Order Origination Code: W	
Account Type Code: U	
Special Handling Code: RSV	
Member Type Code: M	
ATS Display Indicator:	
Desk Timestamp:	
Desk Type Code:	
3 Member Firm reports trade report Trade report includes Branch Sequence Number DEF456.	
for 1,000 shares to the	
FINRA/NASDAQ Trade Reporting	
Facility.	
4 Member Firm reports Execution Sample data from the first Execution Report includes:	
Report to OATS. Order Receiving Firm MPID: FIRM	_
Order Received Date: 2010123110203399	9
Order Receiving Firm Order ID: ABC123	1
Execution Timestamp: 2010123110455567	1
OATS Trade ID: DEF456	
Execution Quantity: 1000	
Trader Terminal ID: TERM01	
Issue Symbol ID: ORCL Execution Type Indicator: P	
Market Center ID:	
Execution Price: 31.00	
Capacity Code: A	
Leaves Quantity: 10000	
5 Member Firm reports trade report Trade report includes Branch Sequence Number HIJ789.	
for 1,000 shares to the	
FINRA/NASDAQ Trade Reporting	
Facility.	
6 Member Firm reports Execution Sample data from the first Execution Report includes:	
Report to OATS. Order Receiving Firm MPID: FIRM	
Order Received Date: 2010123110203399	9
Order Receiving Firm Order ID: ABC123	
Execution Timestamp: 2010123110455988	0
OATS Trade ID: HIJ789	-
Execution Quantity: 1000	
Trader Terminal ID: TERM01	
Issue Symbol ID: ORCL	
Execution Type Indicator: P	

OATS REPORTING TECHNICAL SPECIFICATIONS

ORDER REPORTING

Ref	Event	Event Details	
		Market Center ID:	L
		Execution Price:	31.00
		Capacity Code:	A
		Leaves Quantity:	9000

4.4.33 Correction of Order Information that was Previously Submitted to OATS, Unexecuted Order

This scenario illustrates the reporting requirements to OATS when a firm corrects order information that was incorrectly captured when the order was recorded by the member firm and was previously submitted to OATS. In this scenario, the order is unexecuted. It would not apply if the customer modified the terms of an existing order because the scenario for Cancel/Replace Report would apply.

In this scenario, the member firm recorded the limit price for the customer's order to buy 1,000 shares of AAII as 12. The next day, after confirmation of the order with the customer and after the previous day's OATS reports had been submitted, the member firm discovered that the customer actually requested a limit price of 11. The member firm would report the following events to OATS:

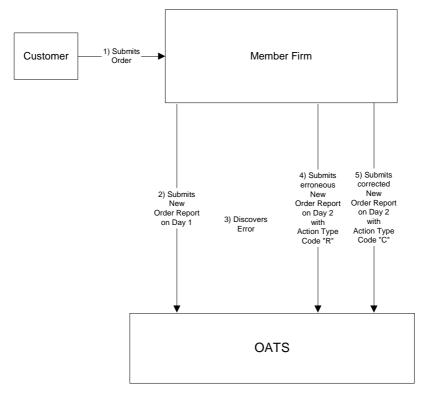
- 1. The receipt of the order from the customer (New Order Report).
- 2. The erroneous New Order Report with Action Type Code "R," indicating a delete for replacement order event, followed by the corrected New Order Report with Action Type Code "C," indicating a corrected order event.

If the customer had modified the terms of the existing order, the member firm would report the changes using the Cancel/Replace Report. If the member firm had discovered the error before any of information was submitted to OATS, it would not be required to submit the New Order Report with the erroneous limit price.

Furthermore, this scenario illustrates the following details:

- 1. The corrected New Order Report must have the same Order Receiving Firm Order ID as the erroneous New Order Report. Firms are not allowed to use corrections to change the Order Receiving Firm Order ID, the Order Receiving Firm Order Received Date, or the Order Receiving Firm MPID. If the member firm had made a mistake in one of these fields, it would be required to submit a delete New Order Report and generate a new New Order Report.
- 2. Firms should only submit corrected reports for events previously accepted by OATS; a corrected report should NOT be generated for rejected reports.
- 3. Firms must place the original report and the corrected report in sequence in a single file. If the corrected report does not immediately follow the replaced (i.e. the original report) report, both reports will be rejected. The pairs of replaced and corrected reports may be commingled with reports of other Action Type Codes in a file or they may be submitted in a separate file.

Figure 4-33. Correction of Order Information that was Previously Submitted to OATS, Unexecuted Order



This scenario includes the following assumptions:

The order was received directly by the desk/department that handled the order.

Table 4-34. Correction of Order Information that was Previously Submitted to OATS, Unexecuted Order, Event Listing

Ref	Event	Event Details	
1	Member Firm receives order from customer.	Buy order for 2,000 shares of AAII	at a limit price of 11;
		the Sales Desk mistakenly records the	
2	Member Firm submits New Order Report to	New Order Report sample data inclu	ides:
	OATS.	Action Type Code:	N
		Order Receiving Firm MPID:	FIRM
		Order Received Date:	20101231102033999
		Order Receiving Firm Order ID:	ABC123
		Order Received Timestamp:	20101231102033999
		Received Method Code:	E
		Issue Symbol ID:	AAII
		Buy/Sell Code:	В
		Shares Quantity:	2000
		Limit Price:	12
		Time in Force Code:	GTC
		Receiving Department ID:	T
		Originating Department ID:	
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		ATS Display Indicator:	
		Desk Timestamp:	
_		Desk Type Code:	
3	Member Firm discovers error.	The customer's limit price for 2,000	shares of AAII was
		actually 11.	
4/5	Member Firm submits replace New Order	The replace New Order Report samp	
	Report followed by a corrected New Order	Action Type Code:	R
	Report to OATS.	Order Receiving Firm MPID:	FIRM
		Order Received Date:	20101231102033999
		Order Receiving Firm Order ID:	ABC123
		Order Received Timestamp:	20101231102033999
		Received Method Code:	E
		Issue Symbol ID:	AAII
		Buy/Sell Code:	B 2000
		Shares Quantity: Limit Price:	12
		Time in Force Code:	GTC
		Receiving Department ID:	T
		Originating Department ID:	1
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		Welliet Type Code.	11
		The corrected New Order Report sa	mple data includes:
		Action Type Code:	C
		Order Receiving Firm MPID:	FIRM
		Order Received Date:	20101231102033999
		Order Receiving Firm Order ID:	ABC123
		Order Received Timestamp:	20101231102033999
		Received Method Code:	E
		Issue Symbol ID:	AAII
		Buy/Sell Code:	В
		Shares Quantity:	2000
		Limit Price:	11
		Time in Force Code:	GTC

OATS REPORTING TECHNICAL SPECIFICATIONS

ORDER REPORTING

Ref	Event	Event Details	
		Order Origination Code: F	
		Account Type Code: I	
		Member Type Code: N	

4.4.34 Manual Routing of the Equity Component of a Complex Order to Another Member Firm

This scenario illustrates the reporting requirements to OATS when a member (Member Firm 1) receives complex orders from customers (Customers 1 and 2) that include equity components and options components. Member Firm 1 routes the options components to an options exchange. Upon determining the price at which the equity components must be executed, Member Firm 1 manually routes the equity components to another FINRA member (Member Firm 2) for execution and reporting to a FINRA transaction reporting system. In this scenario, Member Firm 1 is required to report the following events to OATS:

- 1. The receipt of the equity orders from Customers 1 and 2.
- 2. The route of the equity orders to Member Firm 2.

Member Firm 2 receives the order from Member Firm 1 along with an offsetting buy or sell order, or Member Firm 2 may receive the offsetting buy or sell order from another broker-dealer, and then executes an agency cross and reports it to a FINRA transaction reporting system.

Member Firm 2 is required to report the following events to OATS:

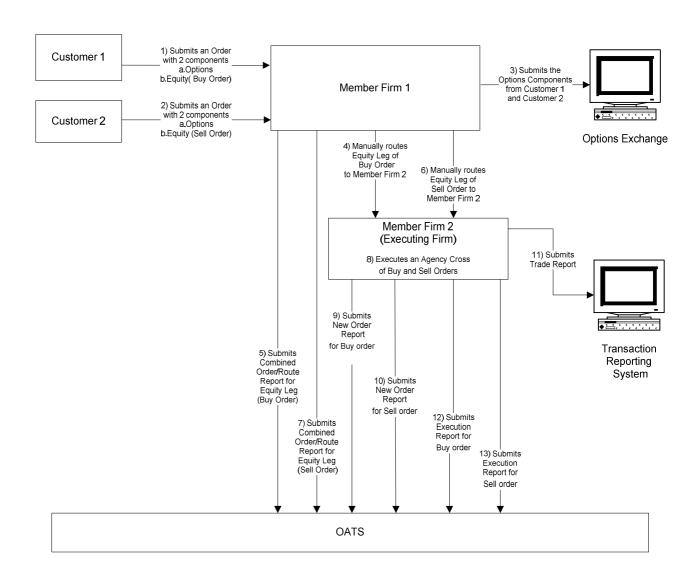
- 1. The receipt of the sell order from Member Firm 1.
- 2. The receipt of the buy order from Member Firm 1, or if received from a different broker-dealer, the identity of that broker-dealer if a FINRA member.
- 3. The execution report for the buy order.
- 4. The execution report for the sell order.

Furthermore, this scenario illustrates the following details:

- 1. When reporting the agency cross to a FINRA transaction reporting system, Member Firm 2 is required to submit unique identifiers (e.g., Branch Sequence Number, Compliance ID) for each side of the trade. Member Firm 2 must also submit these unique identifiers to OATS as the OATS Trade IDs on each Execution Report. The OATS Trade IDs enable the matching of a trade reported to a FINRA transaction reporting system to a related OATS Execution Report. For more information please reference:
 http://www.finra.org/Industry/Compliance/MarketTransparency/OATS/OATSReport/P122781
- 2. Member Firm 1 must include a Special Handling Code of 'OPT' on its New Order Report(s) to identify that the terms and conditions of the equity order were derived from a related options transaction.

Figure 4-34 Manual Routing of the Equity Component of a Complex Order to Another Member Firm

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This scenario includes the following assumptions:

- 1. This represents an order where the terms and conditions of the order are derived from a related options transaction.
- 2. The member received and fully routed the order on the same day; otherwise, separate New Order and Route Reports must be used.
- 3. The member manually routed the Equity Leg to a FINRA member.
- 4. The order was received directly by the desk/department that handled the order.

Table 4-35 Manual Order Routing of a Cash Component of an Options Related Order to Another Member Firm

Ref	Event	Event Details	
1	Member Firm 1 receives order from	Buy order for 2,000 shares of ORCI	L where the terms and
	Customer 1 with two components:	conditions are derived from a relate	d options transaction.
	a. Options		
	b. Equity		
2	Member Firm 1 receives order from	Sell order for 2,000 shares of ORCI	where the terms and
2		conditions are derived from a relate	
	Customer 2 with two components:	conditions are derived from a relate	d options transaction.
	a. Options		
	b. Equity		
3	Member Firm 1 submits Options Components		
	from Customer 1 and Customer 2 to Options		
	Exchange.		
4	Member Firm 1 Manually routes Equity Leg		
	of Buy Order to Member Firm 2.		
5	Member Firm 1 submits Combined	Combined Order/Route Report sam	ple data includes:
	Order/Route Report for Equity Leg (Buy	Order Receiving Firm MPID:	FRM1
	Order) to OATS.	Order Received Date:	20100103105155212
	Older) to OATS.	Order Receiving Firm Order ID:	AFRM11234
		Order Received Timestamp:	20100103105155212
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	B 2000
		Shares Quantity: Receiving Department ID:	2000 A
		Originating Department ID:	А
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code: Sent to Firm MPID:	EDM2
		Sent to Firm MPID: Sent to Routed Order ID:	FRM2
		Order Sent Timestamp:	20100103105255345
		Routed Shares Quantity:	2000
		Routing Method Code:	N
		Special Routing Condition:	
		Exchange Participant ID:	
		Destination Code:	M
-	Mombon Eigen 1 Monyolly garden Facility I	Special Handling Code:	OPT
6	Member Firm 1 Manually routes Equity Leg		
	of Sell Order to Member Firm 2.		
7	Member Firm 1 submits Combined	Combined Order/Route Report sam	_
	Order/Route Report for Equity Leg (Sell	Order Receiving Firm MPID: Order Received Date:	FRM1 20100103105359111
	Order) to OATS.	Order Received Date: Order Receiving Firm Order ID:	AFRM15678
		Order Received Timestamp:	20100103105359111
		Received Method Code:	E
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	2000
		Receiving Department ID:	A

ORDER REPORTING

Ref	Event	Event Deta	ails
		Originating Department ID:	
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	
		Sent to Firm MPID:	FRM2
		Sent to Routed Order ID:	
		Order Sent Timestamp:	20100103105459977
		Routed Shares Quantity:	2000
		Routing Method Code:	N
		Special Routing Condition:	
		Exchange Participant ID:	
		Destination Code:	M
		Special Handling Code:	OPT
8	Member Firm 2 executes an Agency Cross of		
	Buy and Sell Orders.		
9	Member Firm 2 submits a New Order Report	New Order Report sample data inc	ludes:
	to OATS for the Buy order.	Action Type Code:	N
	to critic for the Buy creen	Order Receiving Firm MPID:	FRM2
		Order Received Date:	20100103105500325
		Order Receiving Firm Order ID:	FRM2ABC123
		Order Received Timestamp:	20100103105500325
		Received Method Code:	N
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	В
		Shares Quantity:	2000
		Limit Price:	31.00
		Time in Force Code:	
		Receiving Department ID:	T
		Originating Department ID:	
		Order Origination Code:	W
		Account Type Code:	U
		Member Type Code:	M
		Routing Firm MPID:	FRM1
		Desk Timestamp:	
		Desk Type Code:	
		Special Handling Code:	OPT
10	Member Firm 2 submits a New Order Report	New Order Report sample data inc	ludes:
	to OATS for the Sell order.	Action Type Code:	N
		Order Receiving Firm MPID:	FRM2
		Order Received Date:	20100103105500325
		Order Receiving Firm Order ID:	FRM2JKL123
		Order Received Timestamp:	20100103105500325
		Received Method Code:	N
		Issue Symbol ID:	ORCL
		Buy/Sell Code:	SL
		Shares Quantity:	2000
		Limit Price:	31.00
		Time in Force Code:	
		Receiving Department ID:	T
		Originating Department ID:	
		Order Origination Code:	W
		Account Type Code:	U
		Member Type Code:	M
		Routing Firm MPID:	FRM1

ORDER REPORTING

Ref	Event	Event Details	
		Desk Timestamp:	
		Desk Type Code:	
		Special Handling Code:	OPT
11	Member Firm 2 submits a trade report to the	Trade report includes Branch Sequence Number	
	FINRA/NASDAQ Trade Reporting Facility.	JKLFRM2123 for the sell order and Contra Branch Sequence	
		Number ABCFRM2123 for the buy order.	
12	Member Firm 2 submits Execution Report to	Execution Report sample data includes:	
	OATS for the Buy order.	Order Receiving Firm MPID:	FRM2
		Order Received Date:	20100103105500325
		Order Receiving Firm Order ID:	FRM2ABC123
		Execution Timestamp:	20100103105500388
		OATS Trade ID:	ABCFRM2123
		Execution Quantity:	2000
		Trader Terminal ID:	TERM01
		Issue Symbol ID:	ORCL
		Execution Type Indicator:	F
		Market Center ID:	L
10		Execution Price:	31.00
13	Member Firm 2 submits Execution Report to		
	OATS for the Sell order.	Order Receiving Firm MPID:	FRM2
		Order Received Date:	20100103105500325
		Order Receiving Firm Order ID:	FRM2JKL123
		Execution Timestamp: OATS Trade ID:	20100103105500388 JKLFRM2123
		Execution Quantity:	2000
		Trader Terminal ID:	TERM01
		Issue Symbol ID:	ORCL
		Execution Type Indicator:	F
		Market Center ID:	L
		Execution Price:	31.00

4.4.34 Order Display Modification of an ATS Subscriber Order – Displayed Size Change

This scenario illustrates the reporting requirements to OATS when the displayed size of a subscriber order is modified by an ATS due to a partial execution. In this scenario, the ATS is required to report the following events to OATS:

- 1. The receipt of the order.
- 2. The partial execution of the order.
- 3. The change in displayed size resulting from the partial execution.

Furthermore, this scenario illustrates the following details:

- 1. Additional data elements are required to be reported by ATSs on the OATS origination event.
- 2. Modifications to the displayed price or size of an order are reported to OATS on the Order Display Modification Report.
- 3. The Order Display Modification Report maintains the Order ID of the original order.
- 4. When reporting the modification of the displayed price or size of an order, ATSs must report the time of such modification.

Non-Member
Firm

ATS

ATS

ATS

4) Submits
Trade
Report

Corder

Non-Member

Firm

ATS

ATS

4) Submits
Trade
Report

Transaction Reporting System

Order

Report

OATS

OATS

Figure 4-35. Order Display Modification of an ATS Subscriber Order

This scenario assumes that the ATS displays orders outside the ATS.

Table 4-36. Order Display Modification of an ATS Subscriber Order

Ref	Event	Event Details	
1	ATS receives order from Non-Member Firm 1.	Limit sell order for 200 shares of ABCD at 31.00.	
2	ATS submits New Order Report to OATS.	New Order Report sample data inclu	ides:
		Order Receiving Firm MPID:	ATS1
		Order Received Date:	20160516102033245
		Order Receiving Firm Order ID:	ABC123
		Order Received Timestamp:	20160516102033245
		Issue Symbol ID:	ABCD
		Buy/Sell Code:	SL
		Shares Quantity:	200
		Limit Price:	31.00
		Time in Force Code:	GTC
		Receiving Department ID:	T
		Originating Department ID:	
		Order Origination Code:	W
		Account Type Code:	P
		Member Type Code:	N
		ATS Display Indicator:	S
		ATS Order Type:	ORD1
		Processing Sequence Number:	234569
		Routable Flag:	N
		NBBO Bid Price	30.90
		NBBO Ask Price	30.95
		NBBO Source:	S
		NBBO Date:	20160516
		NBBO Lookup Time:	102033.244891
		Display Size:	200
		Display Price:	31.00
3	ATS Firm submits Execution Report to OATS.	Execution Report sample data include	
		Order Receiving Firm MPID:	ATS1
		Order Received Date:	20160516103555999
		Order Receiving Firm Order ID:	DEF456
		Execution Timestamp:	20160516104557002
		OATS Trade ID:	DEF456
		Execution Quantity:	100
		Trader Terminal ID:	TERM00392
		Issue Symbol ID:	ABCD
		Market Center ID:	DN
		Execution Price:	31.00
		Capacity Code:	A
		Processing Sequence Number:	234590
		NBBO Bid Price	30.90
		NBBO Ask Price	31.00
		NBBO Source:	S
		NBBO Date:	20160516
		NBBO Lookup Time:	104557.001
4	ATS submits a trade to the FINRA/NYSE Trade	Trade report includes DEF456 as the	
	Reporting Facility.		*
5	ATS submits Order Display Modification	Order Receiving Firm MPID:	ATS1
	Report to OATS.	Order Received Date:	20160516102033245
	*	Order Receiving Firm Order ID:	ABC123
		Order Modification Timestamp:	20160516104557999
		Issue Symbol ID:	ABCD
		Processing Sequence Number:	234623
		Display Size:	100
		Display Size. Display Price:	31.00
<u> </u>		Display I fice.	31.00

4.4.35 Order Display Modification of an ATS Subscriber Order – Price Change

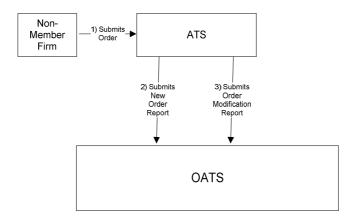
This scenario illustrates the reporting requirements to OATS when the display price of a subscriber order is modified by an ATS as per the order instructions given by the customer in conjunction with a change in the NBBO price. In this scenario, the ATS is required to report the following events to OATS:

- 1. The receipt of the order including the ATS order type.
- 2. The change in displayed price resulting from the NBBO price change.

Furthermore, this scenario illustrates the following details:

- 1. Additional data elements are required to be reported by ATSs on the OATS origination event.
- 2. Modifications to the displayed price or size of an order are reported to OATS on the Order Display Modification Report.
- 3. The Order Display Modification Report maintains the Order ID of the original order.
- 4. When reporting the modification of the displayed price or size of an order, ATSs must report the time of such modification.

Figure 4-36. Order Display Modification of an ATS Subscriber Order



This scenario includes the following assumptions:

- 1. The ATS displays orders outside the ATS.
- 2. The ATSs' order type reflects the customer's instruction to Peg the Order to the NBBO, Post Only.

Table 4-37. Order Display Modification of an ATS Subscriber Order

Ref	Event	Event Details	
1	ATS receives order from Non-Member Firm 1.	Limit buy order for 500 shares of DEFG at 10.00.	
2	ATS submits New Order Report to OATS.	New Order Report sample data includes:	
		Order Receiving Firm MPID:	ATS1
		Order Received Date:	20160516102033245
		Order Receiving Firm Order ID:	ABC123
		Order Received Timestamp:	20160516102033245
		Issue Symbol ID:	DEFG
		Buy/Sell Code:	В
		Shares Quantity:	500
		Limit Price:	10.00
		Time in Force Code:	GTC
		Receiving Department ID:	T
		Originating Department ID:	
		Order Origination Code:	W
		Account Type Code:	P
		Member Type Code:	N
		ATS Display Indicator:	S
		ATS Order Type:	PEGNBBOPO
		Processing Sequence Number:	234569
		Routable Flag:	N
		NBBO Bid Price	9.90
		NBBO Ask Price	9.99
		NBBO Source:	S
		NBBO Date:	20160516
		NBBO Lookup Time:	102033.244891
		Display Size:	500
		Display Price:	9.90
3	ATS submits Order Modification Order to	Order Receiving Firm MPID:	ATS1
	OATS.	Order Received Date:	20160516102033245
		Order Receiving Firm Order ID:	ABC123
		Order Modification Timestamp:	20160516104557999
		Issue Symbol ID:	DEFG
		Processing Sequence Number:	234623
		Display Size:	500
		Display Price:	9.92

4.5 Capacity Scenarios

This section provides an illustration of the different capacities that firms may act in each order reporting scenario.

4.5.1 Firm Acting in a Principal Capacity

This scenario illustrates the reporting requirements to OATS of member firm acting in a principal capacity when filling a customer's order. Upon receipt of a customer order to buy 2,000 shares of an OATS reportable security, the member firm determines to execute the customer's order by selling the customer 2,000 shares from its principal account. In this scenario, the sale of the 2,000 shares to the customer requires the member firm to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The sale of the 2,000 shares to the customer.

When reporting the execution of the order to a FINRA transaction reporting system, the member firm must include the same unique identifier (e.g., Branch Sequence Number, Compliance ID) on the trade report as the OATS Trade ID reported on the OATS Execution Report so OATS can link the trade report to the OATS Execution Report.

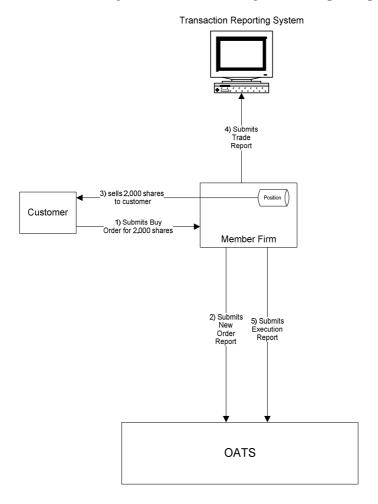


Figure 4-37. Firm Acting in a Principal Capacity

This scenario includes the following assumption:

- 1. The trade is reported to the FINRA/NASDAQ Trade Reporting Facility.
- 2. The order was received directly by the desk/department that handled the order.

Table 4-38 Firm Acting in a Principal Capacity

Ref	Event	Event Details	
1	Member Firm receives order from customer.	Buy order for 2,000 shares of AAII.	
2	Member Firm submits New Order Report to OATS.	New Order Report sample data inclu Action Type Code:	ıdes: N
	011101	Order Receiving Firm MPID:	FIRM
		Order Received Date:	20100103102033912
		Order Receiving Firm Order ID:	ABC123
		Order Received Timestamp:	20100103102033912
		Received Method Code:	Е
		Issue Symbol ID:	AAII
		Buy/Sell Code:	В
		Shares Quantity:	2000
		Limit Price:	
		Time in Force Code:	
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		Receiving Department ID:	T
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	
3	Member Firm sells 2,000 shares to customer.	Sells 2,000 shares of AAII.	
4	Member Firm submits a FINRA/NASDAQ Trade Reporting Facility Report for 2,000 shares.	Trade report includes Branch Sequence Number GHI789.	
5	Member Firm submits Execution Report for	Execution Report sample data includes:	
	2,000 shares to OATS.	Order Receiving Firm MPID:	FIRM
		Order Received Date:	20100103102033912
		Order Receiving Firm Order ID:	ABC123
		Execution Timestamp:	20100103102555123
		OATS Trade ID:	GHI789
		Execution Quantity:	2000
		Trader Terminal ID:	TERM00392
		Issue Symbol ID:	AAII
		Execution Type Indicator:	F
		Market Center ID:	L
		Execution Price:	31.00
		Capacity Code:	P

4.5.2 Firm Acting in an Agency Capacity

This scenario illustrates the reporting requirements to OATS of a member firm that fills a customer's order while acting in an agency capacity. Upon receipt of the customer order for 2,000 shares of an OATS reportable security, the member firm routes 500 shares of the order to a national securities exchange, 1,000 shares to an ECN, and 500 shares to a market maker for handling and execution. In this scenario, the member firm is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The route of the customer order to each executing market center.

The ECN would be required to report the following events to OATS:

- 1. The receipt of the order.
- 2. The execution of the order.

The market maker would be required to report the following events to OATS:

- 1. The receipt of the order.
- 2. The execution of the order.

Furthermore, this scenario illustrates the following details:

- 1. The member firm is required to send a New Order Report for the order it received from the customer and three Route Reports, one each for routing to The NASDAQ Stock Market, market maker, and ECN.
- 2. The market maker and ECN are each required to send a New Order Report and Execution Report for the order they executed with the member firm.
- 3. When reporting the execution of the order to a FINRA transaction reporting system, the market maker and ECN must include the same unique identifier (e.g., Branch Sequence Number, Compliance ID) on the trade report as the OATS Trade ID reported on the OATS Execution Report so OATS can link the trade report to the OATS Execution Report.
- 4. The order was received directly by the desk/department that handled the order.

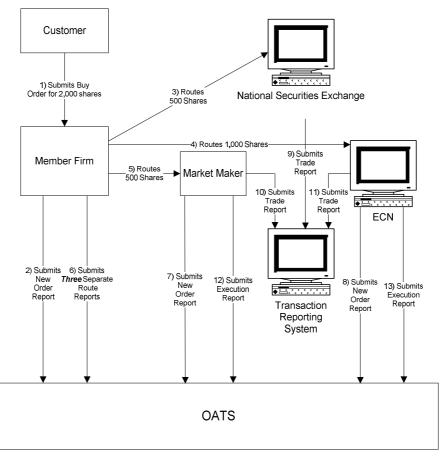


Figure 4-38 Firm Acting in an Agency Capacity

This scenario includes the following assumption:

- 1. The trade is reported to the FINRA/NASDAQ Trade Reporting Facility.
- 2. The order is routed to The NASDAQ Stock market for execution.
- 3. The order was received directly by the desk/department that handled the order.

OATS REPORTING TECHNICAL SPECIFICATIONS

Table 4-39 Firm Acting in an Agency Capacity

Ref	Event	Event Details	
1	Member Firm receives order from customer.	Buy order for 2,000 shares of AAII.	
2	Member Firm submits New Order Report to	New Order Report sample data includes:	
	OATS.	Action Type Code:	N
		Order Receiving Firm MPID:	FIRM
		Order Received Date:	20100103012550745
		Order Receiving Firm Order ID:	ABCD1234
		Order Received Timestamp:	20100103012550745
		Received Method Code:	E
		Issue Symbol ID:	AAII
		Buy/Sell Code:	В
		Shares Quantity:	2000
		Limit Price:	
		Time in Force Code:	
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		Receiving Department ID:	A
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	
3	Member Firm routes Buy order for 500 shares	Trade fills customer order ABCD1234.	
	to The NASDAQ Stock Market where the		
	order is executed.		
4	Member Firm routes Buy order for 1,000	Routed Buy order for 1,000 shares of AAII.	
	shares to ECN.		
5	Member Firm routes Buy order for 500 shares	Routed Buy order for 500 shares of	AAII.
	to Market Maker.		

Ref	Event	Event Details	
6	Member Firm submits Three Separate Route	Route Report sample data includes:	
	Reports to OATS.	Order Receiving Firm MPID: Order Received Date:	FIRM 20100103012550745
		Order Received Date. Order Receiving Firm Order ID:	ABCD1234
		Sent to Firm MPID:	MM01
		Routed Order ID:	ABCD1234
		Issue Symbol ID:	AAII
		Order Sent Timestamp:	20100103012551235
		Routed Shares Quantity:	500
		Routing Method Code: Special Routing Condition:	E
		Exchange Participant ID:	
		Destination Code:	M
		Order Receiving Firm MPID:	FIRM
		Order Received Date:	20100103012550745
		Order Receiving Firm Order ID: Sent to Firm MPID:	ABCD1234
		Routed Order ID:	JKL567
		Issue Symbol ID: Order Sent Timestamp:	AAII 20100103012551236
		Routed Shares Quantity:	500
		Routing Method Code:	E
		Special Routing Condition:	
		Exchange Participant ID:	FIRM
		Destination Code:	XQ
		Order Receiving Firm MPID:	FIRM
		Order Received Date:	20100103012550745
		Order Receiving Firm Order ID: Sent to Firm MPID:	ABCD1234 ECN1
		Routed Order ID:	XYZ890
		Issue Symbol ID:	AAII
		Order Sent Timestamp:	20100103012551237
		Routed Shares Quantity:	1000
		Routing Method Code:	E
		Special Routing Condition: Exchange Participant ID:	
		Destination Code:	E
7	Market Maker submits New Order Report to	New Order Report sample data inclu	
	OATS.	Action Type Code:	N
		Order Receiving Firm MPID:	MM01
		Order Received Date: Order Receiving Firm Order ID:	20100103012551235 ABC123
		Order Received Timestamp:	20100103012551235
		Received Method Code:	E
		Issue Symbol ID:	AAII
		Buy/Sell Code:	В
		Shares Quantity:	500
		Limit Price: Time in Force Code:	
		Order Origination Code:	W
		Account Type Code:	I
		Member Type Code:	M
		Receiving Department ID:	T
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	

ORDER REPORTING

Ref	Event	Event Detail	ls	
8	ECN submits New Order Report to OATS.	New Order Report sample data includes:		
		Action Type Code:	N	
		Order Receiving Firm MPID:	ECN1	
		Order Received Date:	20100103012551237	
		Order Receiving Firm Order ID:	ABC123	
		Order Received Timestamp:	20100103012551237	
		Received Method Code:	E	
		Issue Symbol ID:	AAII	
		Buy/Sell Code:	В	
		Shares Quantity:	1000	
		Limit Price:		
		Time in Force Code:		
		Order Origination Code:	W	
		Account Type Code:	I	
		Member Type Code:	M	
		Receiving Department ID:	ATS	
		ATS Display Indicator:	Y	
		Desk Timestamp:		
		Desk Type Code:		
9	A trade is executed for 500 shares on The			
- 10	NASDAQ Stock Market.			
10	Market Maker executes trade for 500 shares and submits Trade Report.	Trade report includes MM2GHI78 a	as the unique identifier.	
11	ECN executes trade for 1,000 shares and	Trade report includes - ECNGHI789	9 as the unique	
	submits Trade Report.	identifier.		
12	Market Maker submits Execution Report to	Execution Report sample data inclu-	des:	
	OATS.	Order Receiving Firm MPID:	MM01	
		Order Received Date:	20100103012551235	
		Order Receiving Firm Order ID:	ABC123	
		Execution Timestamp:	20100103012558554	
		OATS Trade ID:	MM2GHI78	
		Execution Quantity:	500	
		Trader Terminal ID:	TERM00392	
		Issue Symbol ID:	AAII	
		Execution Type Indicator:	F	
		Market Center ID:	L	
		Execution Price:	31.00	
		Capacity Code:	P	
13	ECN submits Execution Report to OATS.	Execution Report sample data inclu-		
		Order Receiving Firm MPID:	ECN1	
		Order Received Date:	20100103012551237	
		Order Receiving Firm Order ID:	ABC123	
		Execution Timestamp:	20100103012552346	
		OATS Trade ID:	ECNGHI789	
		Execution Quantity:	1000	
		Trader Terminal ID:	TERM01	
		Issue Symbol ID:	AAII	
		Execution Type Indicator:	F	
		Market Center ID:	L	
		Execution Price:	31.00	
		Capacity Code:	A	

4.5.3 Firm Acting in a Riskless Principal Capacity

This scenario illustrates the reporting requirements to OATS for a member firm filling a customer's order while acting in a riskless principal capacity. Upon receipt of a customer order for 2,000 shares of an OATS reportable security, the member firm or market maker executes trades with a national stock exchange for 1000 shares, and an ECN for 1,000 shares at the same price, in a principal capacity, in order to satisfy the customer's order. In this scenario, the member firm is required to report the following events to OATS:

- 1. The receipt of the order from the customer.
- 2. The execution of the customer order.

Furthermore, this scenario illustrates the following details:

- 1. The requirement to send a New Order Report for the order received from the customer and an Execution Report reflecting the execution of the customer's order applies to both Market Makers and Non-Market Makers.
- 2. Member firms using the "original approach" for complying with FINRA Trade Reporting Rules for riskless principal transactions (*Notice to Members 99-65*) should populate the Reporting Exception Code field on the OATS Execution Report with "R" (Riskless Principal Transaction) if the member firm was unable to populate the unique identifier (e.g., Branch Sequence Number, Compliance ID) in the original transaction report reflecting the member firm's capacity as "R".
- 3. Member firms using the "alternative approach" for complying with FINRA Trade Reporting Rules for riskless principal transactions (*Notice to Members 00-79*) must provide a unique identifier on both the OATS Execution Report and the FINRA transaction reporting system report in order for OATS to match the OATS Execution Report to the related clearing only or non-clearing, non-tape FINRA transaction reporting system report if the street side execution occurred over-the-counter or if the member elected to submit a riskless transaction report for a trade where the initial leg was executed on a national securities exchange.

Transaction Reporting System

A) Submits
Trade Report

Non Market Maker or
Market Maker

2) Submits
New
Order
Report

OATS

OATS

Figure 4-39 Firm Acting in a Riskless Principal Capacity

This scenario includes the following assumption:

- 1. The trade is reported to the FINRA/NASDAQ Trade Reporting Facility.
- 2. The order was received directly by the desk/department that handled the order.

The following events occur:

- 1. Member Firm (market maker or non-market maker) submits New Order Report to reflect receipt of customer order.
- 2. Member Firm (market maker or non-market maker) submits an OATS Execution Report to reflect execution of the customer leg of the transaction.
- 3. **If a member firm uses the original approach for complying with FINRA rules for reporting of riskless principal transactions, the member firm populates the Reporting Exception Code field on the OATS Execution Report with "R" (Riskless Principal Transaction) if unable to populate the unique identifier on the transaction report reflecting the member firm's capacity as "R". If a firm uses the alternative approach for complying with FINRA rules for reporting of riskless

principal transactions and submits a clearing only or non-tape, non-clearing report to a FINRA transaction reporting system for regulatory purposes, the firm populates the unique identifier on both the OATS Execution Report and the related FINRA transaction reporting system clearing only or non-clearing, non-tape report in order for the two reports to match.

4. The proprietary order and related execution is not reportable to OATS by market makers or non-market makers in a riskless principal transaction.

Table 4-40 Firm Acting in a Riskless Principal Capacity

Ref	Event	Event Details	
1	Member Firm receives order from customer.	Buy order for 2,000 shares.	
2	Member Firm submits New Order Report to	New Order Report sample data includes:	
	OATS.	Action Type Code:	N
		Order Receiving Firm MPID:	MM01
		Order Received Date:	20100103102050123
		Order Receiving Firm Order ID:	ABC123
		Order Received Timestamp:	20100103102050123
		Received Method Code:	E
		Issue Symbol ID:	AAII
		Buy/Sell Code:	В
		Shares Quantity:	2000
		Limit Price:	
		Time in Force Code:	
		Order Origination Code:	F
		Account Type Code:	I
		Member Type Code:	N
		Receiving Department ID:	T
		ATS Display Indicator:	
		Desk Timestamp:	
		Desk Type Code:	
3	Member Firm submits Execution Report for	Execution Report sample data includes:	
	Customer Leg to OATS.	Order Receiving Firm MPID:	MM01
		Order Received Date:	20100103102050123
		Order Receiving Firm Order ID:	ABC123
		Execution Timestamp:	20100103102051278
		OATS Trade ID:	DEF456
		Execution Quantity:	2000
		Trader Terminal ID:	TERM00392
		Issue Symbol ID:	AAII
		Execution Type Indicator:	F
		Market Center ID:	L
		Execution Price:	31.00
		Capacity Code:	R
4	Member Firm submits Trade Report for the	Trade report includes DEF456 as th	e unique identifier.
	Customer Leg.		

OATS REPORTING TECHNICAL SPECIFICATIONS

ORDER REPORTING

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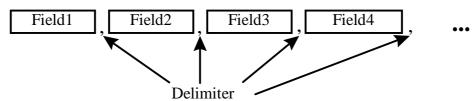
5. Data Reporting Formats

This section and Appendix C—Order Report Formats, describe the detailed specification for the layout of the OATS submissions (files).

5.1 Record Formats

The OATS system maintains an audit trail of Reportable Order Event records (ROEs), which contain several data elements, or fields. This section describes the methods required to format and package these ROEs for submission to OATS. OATS supports only a delimited format. Additional details about this format, including a complete description of all fields in each order event, are contained in Appendix C—Order Report Formats.

Figure 5-1. Record Format



The delimited format, shown in Figure 5-1, can also be described as a field separated format, because fields within each record are separated by a delimiter. The delimiter marks the end of the current field and the beginning of the next field. Each field is identified by its relative position within each record. The sequence of the fields within each record must be exactly as stated in the record descriptions. In addition, each field is designated mandatory (M) or conditional (C). Conditional fields must appear in the record, but they may contain only the delimiter.

The following rules apply to the delimited formats:

- 1. The sequence of the fields within each record is fixed. Each record must be in the sequence described in Appendix C—Order Report Formats.
- 2. Each field must be terminated by a delimiter even if the field is the maximum length.
- 3. None of the fields in the record can contain the character used for the delimiter.
- 4. The last field in a record is not required to be terminated by a delimiter, but the field will still be considered to be acceptable if the delimiter is included.
- 5. The delimiter is determined by examination of the fifth character of the header record. (See Section 5.2.1.) Each record must end with an end of record marker (ASCII LF or CR/LF) as shown in the format descriptions in Appendix C—Order Report Formats.
- 6. Each field is positional, that is, the order of the fields within each record is a fixed sequence. The position of each field is relative to the beginning of its associated record. Record type is always the first field.
- 7. Fields must be equal to or less than the full length specified.
- 8. Conditional fields (C) are omitted by only including the delimiter.

- 9. Mandatory (M) fields must contain an appropriate value and be terminated by the delimiter.
- 10. Values that do not fill the fields may be padded with blanks or zeroes, as appropriate, but padding is NOT required.
- 11. Numeric fields may be padded with leading zeros.
- 12. Alphanumeric fields may be optionally padded with trailing blanks.
- 13. Date fields are always eight (8) digits and are specified as date (8) formatted as "YYYYMMDD".
- 14. Timestamp fields are always seventeen (17) digits and are specified as numeric (14) formatted as "YYYYMMDDHHMMSSCCC".
- 15. Fields labeled as Numeric (n,m) must contain no more than n characters, including the decimal; must contain no more than m characters to the right of the decimal; and must contain no more than n-m characters to the left of the decimal, whether a decimal is implied or not. The decimal is optional only in a case where the price is a whole number. These fields are used for price fields.

5.2 File Formats

Several ROEs are combined into a single FORE, and one or more FOREs may comprise a FORE file. FOREs must be assembled in a prescribed sequence: <header><one or more order event records><trailer>. The header record is required to be the first record, and the trailer record is required to be the last record. The rest of the records may be included in any order. (NOTE: Corrections require an ordered sequence as described in Section 6.5.1) Figure 5-2, shows the relationship between the files, record and fields for the delimited format.

Firm Order Report (FORE) **Firm Order Report File Submission** (FORE) Header Header **FORE** Reportable Order One or more ROEs Event (ROE) Trailer ROEs **FORE** One or more **FORE FORE** Fields are in a Field fixed sequence value<delimiter> and are terminated **FORE** by a delimiter. Trailer

Figure 5-2. Delimited Format

All order events within a FORE (header/trailer pair) must apply to the Order Receiving Firm MPID identified in the header. If order events for more than one combination of Order Receiving Firm MPID and Reporting OSO are generated, the order events for each combination of Order Receiving Firm MPID and Reporting OSO must be packaged in a separate FORE. If a firm uses multiple MPIDs, a separate FORE must be submitted for each MPID. Order events must include the firm MPID that was in effect when the event occurred.

The following rules apply to the formatting of FOREs and FORE files:

- 1. Each FORE must contain a header record as the first record.
- 2. Each FORE must contain a trailer as the last record.
- 3. Each file is limited to a maximum uncompressed size of 25MB.
- 4. Compressed files must have a root file name the same as the original uncompressed file and a file extension of .gz.
- 5. OATS will examine each header to determine if the User ID supplied is associated with a valid Transmitting Order Sending Organization (OSO).
- 6. OATS will examine each header to determine if the Order Receiving Firm MPID is valid.
- 7. OATS will examine each header to determine if the Reporting/Transmitting OSO ID, if supplied, is valid.
- 8. OATS will examine each OSO ID and Order Receiving Firm MPID for FORE file reporting/transmitting privileges.
- 9. Failure to pass validation on any mandatory header or trailer values will result in rejection of the entire FORE.
- 10. All order events contained in a FORE (header/trailer pair) must apply to the combination of Order Receiving Firm MPID and Reporting OSO identified in the header.
- 11. Order events within the FORE may be in any sequence, except for the events addressed in Section 6.5.
- 12. Firms may send order events in more than one file if the file size limit is reached. However, an individual ROE record may not be split or submitted in multiple FORE files.
- 13. Each file may contain multiple FOREs; when it does, the record immediately following a trailer record must be a header record, which must have a corresponding trailer record. There is no limit to the number of FOREs in a file.
- 14. Each FORE (i.e. each header when files contain multiple FOREs) must contain a Firm FORE ID to identify it. The Firm FORE ID is an alphanumeric field of up to 20 characters. The Firm FORE ID must be unique to the OSO for the supplied Generation Date. OATS will validate this field against a list of recently sent files to detect duplicate submissions. Duplicate file submissions will be rejected.
- 15. FORE filenames may not have filename extensions of .status or .rejects, and may not include colons or spaces.

5.2.1 Header Records

Header records are used to identify and authenticate files and the firms submitting files. A header identifies the Order Receiving Firm MPID that is the subject of reporting; the Transmitting OSO, which packages FORE files and physically transfers order data to OATS; and the Reporting OSO, a third party that is authorized to view, submit, or repair the Order Receiving Firm's data. (For example, a Reporting OSO could be a clearing firm with responsibilities to repair rejections for the Order Receiving Firm.)

The header consists of a record type, Version Description, Generation Date, Firm FORE ID, Reporting OSO ID, User ID, Password, Order Receiving Firm MPID and an end of record marker.

Figure 5-3. Header Example

#HD#,OATS D1999-01,19981008,MyFirmFOREID,ReportingOSOID,Myuserid,Mypassword,MPID

NOTE: User ID and password fields are not required in the header of FOREs sent via FTP, SFTP and IFT.

Transmitting OSOs must submit a separate FORE for each combination of Order Receiving Firm MPID and Reporting OSO ID. The Order Receiving Firm, Transmitting OSO, and Reporting OSO all have access to any records contained in the FORE. If no Reporting OSO is designated, only the Transmitting OSO and the Order Receiving Firm have access to the records in the FORE. Multiple FOREs can be packaged in a single file.

A FINRA member firm that meets the requirements for OATS Reporting is required to designate an OSO; however, a member firm may designate more than one OSO, employing one organization for the handling of a portion of its records (e.g., institutional orders) and another for other records (e.g., retail orders). There may only be one Transmitting OSO and one Reporting OSO associated with each FORE.

The following figures illustrate some possible scenarios by showing how records in the FORE header would identify the separate organizations and their roles. In Scenario 1, the Order Receiving Firm acts as its own Transmitting OSO. In Scenario 2, the Transmitting OSO (financial service bureau) sends the Order Receiving Firm's data to OATS. In Scenario 3, a clearing firm reports on behalf of an Order Receiving Firm via a financial service bureau.

Figure 5-4. OSO Scenario 1

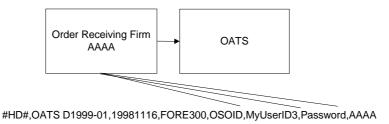


Figure 5-5. OSO Scenario 2

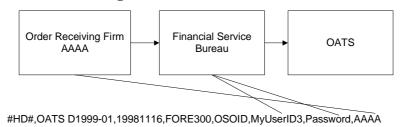
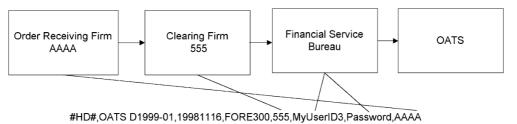


Figure 5-6. OSO Scenario 3



The header is also used to set the delimiter character to be used for the remainder of the FORE. The delimiter character is determined by the fifth character in the header, which follows the four character record type code "#HD#". The delimiters are restricted to one of the following ASCII characters: (comma (,), semicolon (;), pipe (|), tab (\rightarrow)).

Each header record must be terminated by an end of record marker, which can be either a single ASCII LF character, or the combination ASCII CR/LF.

5.2.2 Trailer Records

Trailer records are used to signify the end of the FORE. They include integrity information, such as the number of records included in the FORE. OATS verifies the record count, but it is not a reason for rejection. If the supplied count is incorrect, a warning (W) exception type is included in the FORE status report. Each trailer record must be terminated by an end of record marker, which can be either a single ASCII LF character or the combination ASCII CR/LF.

The trailer consists of a record type and an end of record marker. It may also contain a count of the number of order event records in the file. An example trailer is shown in Figure 5-7.

Figure 5-7. Trailer Example

#TR#,7654

5.2.3 Reportable Order Event Records

The contents of each of the eight types of order events have been discussed in Section 4—Order Reporting Scenarios and the formats are shown in complete detail in Appendix A—Data Dictionary and Appendix C—Order Report Formats. The nine types of order events are as follows: New Order, Route, Desk, Execution, Cancel, Cancel/Replace, Order Display Modification, Combined Order/Execution, and Combined Order/Route.

5.3 Feedback Formats

Feedback items, including FORE status files, ROE rejection files, Unmatched Execution Reports, Unmatched Exchange Route Reports, and Unmatched Interfirm Route Reports, may be downloaded via FTP, SFTP, IFT or the Web. The formats of each feedback item are explained in Appendix C.

6. Feedback and Corrections

OATS provides feedback to firms and Order Sending Organizations (OSOs) regarding the status of their OATS submissions, including:

- **FORE Status**—indicates acceptance or rejection of a Firm Order Report file (FORE)
- **ROE Rejections**—identifies Reportable Order Event records (ROEs) that failed validation
- Reporting Statistics—provides daily summary statistics of reporting activity
- Out of Sequence Reports identifies subsequent events reported to OATS with an event timestamp prior to the Order Received timestamp of the originating event
- Unmatched Execution Reports— identifies match eligible Execution Reports that do not link with trades reported to a FINRA transaction reporting system
- Unmatched Exchange Route Reports—identifies match eligible Route Reports that do not link with orders submitted to a national securities exchange
- Unmatched Interfirm Route Reports—identifies match eligible Route Reports that do not link to a corresponding New, Cancel/Replace, Combined Order/Execution or Combined Order/Route Report
- **Unlinked Trade Reports** identifies link eligible trades reported to a FINRA transaction reporting system that do not link with Execution Reports.
- **Unlinked Exchange Orders** identifies link eligible orders submitted to a national securities exchange that do not link with Route Reports.
- Unlinked New Order Reports identifies link eligible New, Combined Order/Execution or Combined Order/Route Reports that do not link to a corresponding Route Report.

Feedback information may indicate that repairs to the FORE or one or more ROEs are required. Firms may also identify errors made in reporting during routine order reconciliation activities. This section addresses the procedures for repairing FORE and ROE errors and generating firm-initiated corrections. (For a list of error messages, see Appendix B—Error Messages.)

6.1 FORE Status

The purpose of the FORE Status is to indicate whether a FORE was accepted or rejected. The FORE Status is provided within one hour after the FORE file is received via the same method used for file submission. The FORE Status is also available on the Web and accessible to the Order Receiving Firm, Transmitting OSO, and Reporting OSO, if applicable. A separate FORE Status record is generated for each FORE (header/trailer pair) in the FORE file.

If a FORE is accepted, OATS will process the ROEs within it; if the FORE is rejected, OATS will not process any of the ROEs within the FORE. Rejection of one FORE does not automatically result in rejections of other FOREs within the file. If a FORE is rejected, the OSO must repair and repackage the FORE and resubmit the file to OATS. Only the rejected FORE should be

resubmitted. If other FOREs within the file were accepted, they should not be resubmitted. The Firm FORE ID on the resubmitted FORE may either be the same identifier used for the rejected FORE or a new Firm FORE ID that is unique within the generation date. (For a list of error messages, see Appendix B—Error Messages.)

Common reasons for rejections include:

- **Duplicate FORE**—the Firm FORE ID is the same as a FORE previously accepted by OATS for the same Generation Date.
- **Invalid OSO ID**—the OSO ID in the Header record is not recognized by OATS, is no longer valid, or does not have a reporting/transmitting relationship with the firm designated in the header.
- **Missing or Invalid User ID**—the User ID was either missing, in an invalid format, or was not recognized by OATS.
- **Missing or Invalid Password**—the Password was either missing, in an invalid format, expired, or was not recognized by OATS.
- **Missing or Invalid Market Participant Identifier (MPID)**—the MPID in the Header Record is missing, inactive, or is not recognized by OATS.
- Missing or Invalid Header Record Type Code—the value provided in the Record Type Code field was either missing or was a value other than "#HD#" (Header). In this case, no FORE Status will be available because the OSO cannot be identified.
- **Missing or Invalid Trailer Record Type Code**—the value provided in the Record Type Code field was either missing or was a value other than "#TR#" (Trailer).
- **Missing or Invalid Generation Date**—the Generation Date in the Header record is missing or invalid.
- **Missing or Invalid Version Description**—the Version Description provided in the Header record is missing or invalid.

If the FORE Status indicates the FORE was accepted with a warning that one or more errors were detected, the FORE file should NOT be resubmitted. However, the FORE packaging program should be modified to supply the correct information in the future. One common warning is Invalid Record Count. This warning means that the record count provided by the firm in the Trailer record does not match the number of ROEs received by OATS.

FORE Status should be available no later than one hour after the file is submitted. For instance, if the FORE were submitted at 13:00 Eastern Time on Tuesday, the Status should be available by 14:00 Eastern Time on the same day.

6.2 Reportable Order Event (ROE) Rejections

ROE rejections are ROEs that failed to pass validation checks. If any validation fails, the ROE is rejected and an associated error message is assigned representing each validation that failed. ROE validations include:

- Syntax and Semantics determines for each field in the ROE if the format and length are correct, valid values are used, and required fields are populated. Syntax and Semantic errors are available within four hours of receipt of an accepted FORE status message. Common syntax and semantic reasons include:
 - Missing mandatory field—a value is not provided for a mandatory field. For example, the order quantity field is blank. (NOTE: Under certain conditions, "Conditional" fields are mandatory. For example, the Customer Instruction Flag is mandatory if a limit or stop price is provided.)
 - Invalid Field—value supplied contains invalid characters or is not among the
 allowed values for the field. For example, OATS does not recognize the provided
 issue symbol or the Time in Force field contains a code that is not an allowed value
 for the field.
 - o **Invalid Field Combination**—two fields supplied in the ROE are in conflict. For instance, the Order Expiration Date is earlier than the Order Received Date.
- Context Checking compares the ROE against previously received ROEs to identify duplicates or secondary events without an originating event. Context errors are available within 24 hours after the OATS Reporting deadline. Context rejection reasons include:
 - o **Duplicate ROE** the ROE is a duplicate of a previously submitted ROE.
 - o **Duplicate Order Identifier**—the order identifier of the ROE is a duplicate of a previously submitted ROE. Order identifiers must be unique for each originating event for an OATS Business Day.
 - Report is for an order that does not exist in OATS—a Cancel, Route, Execution, Desk, or Cancel/Replace Report references an order identifier for which an originating event (New, Combined Order/Route, Combined Order/Execution or Cancel/Replace Report) cannot be found in OATS. This may be because the order was not reported, or was rejected.

6.2.1 Accessing Rejections

Rejections that require repair may be viewed in detail and repaired via the OATS Web interface; formatted ROE rejection files may also be downloaded from OATS via the FTP, SFTP, IFT and Web.

ROE rejection files downloaded via FTP, SFTP, and IFT are available only to the OSO that submitted the original ROEs; therefore, any rejections of ROEs submitted for a firm by one OSO would not be available to another OSO. Firms viewing or downloading rejections via the Web can access all of their rejections, regardless of which OSO submitted the original records.

Once ROE rejections are available, they may be repaired.

6.2.2 Rejection Repair

All ROE rejections that require repair must be researched and repaired by the firm within five OATS Business Days from the date when Context Rejections are available.

Firms that use multiple Transmitting OSOs may need to coordinate with these entities to ensure that ROE rejections are repaired and resubmitted in a timely manner. There are two ways to repair a rejected ROE:

- **Resubmit the repaired ROE in a new FORE**—a firm may regenerate the repaired ROE, package it in a new FORE, and resubmit the FORE to OATS. The following rules apply when resubmitting a rejected ROE via a FORE:
 - 1. Indicate the ROE is a rejection resubmission by setting the Rejected ROE Resubmit Flag to 'Y' (Yes). OATS will auto-populate this field to 'Y' in the download file(s) available via FTP, SFTP, IFT, and the Web Interface.
 - 2. The Rejected ROE ID of the resubmitted ROE must be equal to the value assigned by OATS when the ROE rejected. OATS will auto-populate this field in the download file(s) available via FTP, SFTP, IFT, and the Web Interface.
 - 3. The resubmitted ROE may be commingled with other ROEs in a FORE, or may be sent in a FORE that contains only rejection resubmissions.
 - 4. The Action Type Code of the repaired ROE should retain its original value (provided it was a valid value). For instance, if a New Order Report had an Action Type Code of 'N' (New), the repaired ROE would also have an Action Type Code of 'N'. It should **NOT** have an Action Type Code of 'C' (Correction). In addition, the Correction/Deletion Timestamp should only be used when submitting a correction to an order that was previously accepted by OATS.
- **Repair the ROE via the Web**—users from the Transmitting OSO, Reporting OSO, or Order Receiving Firm may repair and resubmit the ROE via the OATS Web interface.
 - 1. OATS will auto-populate the Rejected ROE Resubmit Flag to 'Y' on the Web Interface.
 - 2. OATS will auto-populate the Rejected ROE ID with a unique identifier.

Upon receipt of a resubmitted rejection, OATS will use the Rejected ROE ID to link the repaired report with the original rejection. Firms MUST populate the Rejected ROE ID field on resubmissions with the OATS assigned value; otherwise, OATS will not reconcile the rejection and the record will be considered unrepaired.

6.2.3 Rejections that Do Not Require Repair

ROEs that reject for a reason that do not require repair are not provided back to firms. Rejections that do not require repair include:

- **Duplicate Order Event** the ROE is a full duplicate of a previously submitted ROE.
- **Issue is Not Reportable to OATS** the ROE contains a symbol that is not an OATS Reportable issue.

Note: Rejections that do not require repair are available upon request. Firms may contact the OATS Business Support Helpdesk to obtain this data.

6.3 Reporting Statistics

On a daily basis, OATS provides summary statistics via the Web for reporting activity for the previous OATS Reporting Day. For example, if the OATS Reporting Day ended at 08:00 Eastern Time on Tuesday, the statistics will be available by 08:00 Eastern Time on Wednesday. Statistics are available to Transmitting OSOs, Reporting OSOs and Member Firms and include:

- Total ROE Count total number of ROES received from an OSO or Member Firm.
- Late ROE Count total number of ROES that were received late.
- Total Resubmit Count total number of ROES resubmitted from an OSO or Member Firm.
- Total Rejected ROE Count total number of ROES that were rejected.
- Order Event Counts total number of ROES broken down by order report type.
- Rejected ROE Counts total number of rejected ROES broken down by order report type.

6.4 Out of Sequence Events

On a daily basis, OATS provides a summary and list of events where the event timestamp reported on the Route, Desk, Execution or Cancel report is prior to the Order Received timestamp reported on the originating event.

- Route Order sent timestamp reported on the Route report is prior to the order received timestamp reported on the originating event.
- Desk Desk received timestamp reported on the Desk report is prior to the order received timestamp reported on the originating event.
- Execution Execution timestamp reported on the Execution report is prior to the order received timestamp reported on the originating event.
- Cancel Order cancel timestamp reported on the Cancel report is prior to the order received timestamp reported on the originating event.
- Cancel/Replace Order cancel timestamp reported on the Cancel/Replace report is prior to the order received timestamp reported on the originating event.

6.5 Unmatched Execution and Combined Order/Execution Report Data

OATS must be able to link Execution and Combined Order/Execution reports with trades reported to a FINRA transaction reporting system as per the following:

- Event Type Code is 'EX' (Execution) or 'OE' (Combined Order/Execution)
- Market Center ID represents a FINRA transaction reporting system (Refer to Appendix A for a list of Market Center IDs which represent a FINRA transaction reporting system).
- Reporting Exception Code is not populated

• Action Type Code is 'N' (New)

The following fields are used for the match criteria¹:

- 1. MPID
- 2. Execution Date
- 3. OATS Trade ID
- 4. Issue Symbol²
- 5. Execution Timestamp³

For Execution Reports submitted to OATS that are not marked late, or are submitted to OATS one business day late (i.e., second OATS Reporting Day after the order event has occurred), OATS attempts to match to TRF/ORF/ADF data reported to FINRA on T and T+1. If after the second OATS Reporting Day, OATS cannot find a corresponding trade record with the exact same values in these fields, the OATS report is considered to be unmatched. For OATS Execution Reports remaining unmatched after the second OATS Reporting Day, OATS will attempt to match that Unmatched Execution Report against any late reported TRF/ORF/ADF trade reports received by FINRA through T+30.

Execution Reports where a match to a late TRF/ORF/ADF report is found will be credited to the firm and will appear as reconciled events in the matching statistics on the OATS website. If after 30 business days, OATS does not find a matching late TRF/ORF/ADF corresponding trade record with the exact same values in these fields, the OATS report is considered to be unmatched.

Each unmatched ROE will have one associated error message. (For a list of Unmatched Reason Codes, refer to Appendix B). The primary reasons for unmatched ROEs include:

- Late Reported ROEs Execution or Combined Execution is reported more than one OATS business day after the order was executed.
- OATS Trade ID- Value supplied to OATS does not match to a corresponding trade report.
- Execution Timestamp all values supplied to OATS except the Execution Timestamp match to a corresponding trade report.

http://www.finra.org/Industry/Compliance/MarketTransparency/OATS/OATSReport/P492577

¹ Refer to the OATS Report titled "Changes to Order/Trade Matching Requirements for OTC Equity Securities" using the following link:

² Symbol formats required by transaction reporting systems may be different than the primary listing format as required by OATS. OATS will map the OATS reported symbol to the applicable transaction reporting system symbol format for matching purposes.

³ If the firm reports Execution Timestamp in milliseconds to a FINRA transaction reporting system, OATS will include milliseconds as part of the Order Trade Matching criteria beginning September 15, 2014. Therefore, both the FINRA transaction reporting system Execution Timestamp and the OATS Execution Timestamp must be identical to the millisecond.

Unmatched ROEs may also occur when an OATS Trade ID is identified but the MPID, Issue Symbol, or a combination of fields does not match to a corresponding trade. OATS considers these ROEs unmatched due to a secondary data error.

Unmatched Execution and Combined Order/Execution Reports may be retrieved via FTP, SFTP, IFT and the OATS Web interface within two business days of the processing date of the original FORE.

6.6 Unmatched Exchange Route Report Data

OATS must be able to link Route and Combined Order/Route reports with orders sent to an exchange as per the following:

- Event Type Code is 'RT' (Route) or 'OR' (Combined Order/Route)
- Destination Code is any of the following:
 - o 'XQ' (The NASDAQ Stock Market)
 - o 'XB' (NASDAQ OMX BX)
 - o 'XX' (NASDAQ OMX PHLX)
 - o 'XN' (New York Stock Exchange)
 - o 'XA' (NYSE MKT)
 - o 'XP' (NYSE Arca)
 - o 'XJ' (EDGA Exchange)
 - o 'XK' (EDGX Exchange)
 - o 'XV' (Investors Exchange)⁴
 - o 'XY' (BATS BYX Exchange)
 - o 'XZ' (BATS BZX Exchange)
- Action Type Code of 'N' (New)
- Routing Method Code of 'E' (Electronic) or 'S' (Smart Router)

The following fields are used for the match criteria⁵:

- 1. Exchange Participant ID to Exchange Participant ID
- 2. Trade Date to OATS Order Sent Timestamp (Date portion)

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⁴ Pending SEC approval, Investors' Exchange LLC will be operating as the stock exchange, Investors Exchange.

⁵ Refer to the OATS Report titled "FINRA Guidance on Exchange Route Matching" using the following link: http://www.finra.org/Industry/Compliance/MarketTransparency/OATS/OATSReport/P340607

- 3. Exchange Symbol to Issue Symbol
- 4. Order ID to OATS Routed Order ID (RT) or Sent to Routed Order ID (OR)
- 5. Connection ID to Connection ID, if provided

For Route Reports submitted to OATS that are not marked late, or are submitted to OATS one business day late (i.e., second OATS Reporting Day after the order event has occurred), OATS attempts to match to the related exchange data and if no corresponding order record with the exact same values in these fields is found, the OATS report is considered to be unmatched.

If exchange data is not available for matching within first two days and Route Reports are marked as unmatched, OATS will attempt to match to any additional exchange data received through T+30. Route Reports where a match to late exchange data is found will be credited to the firm and will appear as reconciled events in the matching statistics on the OATS website. If after 30 business days, OATS does not find a matching exchange order record with the exact same values in these fields, the OATS report is considered to be unmatched.

Each unmatched route will have one associated error message. (For a list of Unmatched Reason Codes, refer to Appendix B). The primary reasons for unmatched routes include:

- Late Reported ROEs Route or Combined Order/Route is reported more than one OATS business day after the order was routed.
- Routed Order ID/Sent to Routed Order ID The value supplied to OATS does not match to a corresponding exchange order for the trade date.
- Exchange Participant ID A matching Order ID was identified in the exchange order data for the trade date; however, the Exchange Participant ID did not match.

Unmatched Route and Combined Order/Route Reports may be retrieved via FTP, SFTP, IFT and the OATS Web interface within two business days of the processing date of the original FORE.

6.7 Unmatched Interfirm Route Report Data - Orders Routed

OATS must be able to link Route and Combined Order/Route reports to the corresponding New Order, Cancel/Replace, Combined Order/Execution or Combined Order/Route report submitted by the firm to which the order was routed as per the following:

- Event Type Code is 'RT' (Route) or 'OR' (Combined Order/Route)
- Routing Method Code is 'E' (Electronic) or 'S' (Smart Router)
- Destination Code is 'M' (Member) or 'E' (ECN)

The following criteria are used for the comparison:

- 1. Sent to Firm MPID to Order Receiving Firm MPID
- 2. Order Receiving Firm MPID to Routing Firm MPID
- 3. Routed Order ID (RT) or Sent to Routed Order ID (OR) to Routed Order ID

- 4. Issue Symbol
- 5. Order Sent Timestamp (Date portion) to Order Received Timestamp (Date portion)

For Route Reports submitted to OATS that are not marked late, or are submitted to OATS one business day late (i.e., second OATS Reporting Day after the order event has occurred), OATS attempts to match to new order type events submitted to OATS on the same OATS Reporting Day as the Route Report and one additional OATS Reporting Day. If no corresponding new type OATS event is found with the exact same values in these fields, the OATS Route Report is considered to be unmatched. For OATS Route Reports remaining unmatched after the second OATS Reporting Day, OATS will attempt to match those Route Reports against any late reported new type events received through T+30.

Route Reports where a match to a late new type event is found will be credited to the firm and will appear as reconciled events in the matching statistics on the OATS website. If after 30 business days, OATS does not find a matching late new type event with the exact same values in these fields, the OATS report is considered to be unmatched.

Please note that Route Reports with an Order Sent Timestamp after Market Hours on Day T are not required to be reported until 8:00 a.m. following the next OATS Business Day. Similarly, new orders with an Order Received Timestamp after Market Hours are also not required to be reported until 8:00 a.m. following the next OATS Business Day. Consequently, it is possible that either the routing or receiving firm reports the event on Day T while the other firm reports the event as part of the next OATS Business Day. In instances where the routing firm reported on Day T but the receiving firm reported its new order as part of the next OATS Business Day, the Route Report will be marked as unmatched on Day T but will appear as reconciled the next OATS Business Day when the receiving firm's order is received by OATS (or up to 30 business days of Day T).

Each unmatched order will have one associated error message. (For a list of Unmatched Reason Codes, refer to Appendix B). The primary reasons for unmatched orders include:

- Late Reported ROEs Route or Combined Order/Route is reported more than one OATS business day after the order was routed.
- Routed Order ID/Sent to Routed Order ID-value supplied to OATS does not match to a corresponding Receiving Firm Order for the Order Sent Date.
- Sent to Firm MPID A Routed Order ID was identified in the Receiving Firm Order data for the Order Sent Date; however, the Sent To/Order Receiving Firm MPIDs did not match.

Unmatched Route and Combined Order/Route Reports may be retrieved via FTP, SFTP, IFT and the OATS Web interface within two business days of the processing date of the original FORE.

6.8 Unmatched Interfirm Route Report Data - Orders Received

OATS must be able to link Route and Combined Order/Route reports to the corresponding New Order, Cancel/Replace, Combined Order/Execution or Combined Order/Route report submitted by the firm to which the order was routed as per the following:

- Event Type Code is 'RT' (Route) or 'OR' (Combined Order/Route)
- Routing Method Code is 'E' (Electronic) or 'S' (Smart Router)
- Destination Code is 'M' (Member) or 'E' (ECN)

The following criteria are used for the comparison:

- 1. Sent to Firm MPID to Order Receiving Firm MPID
- 2. Order Receiving Firm MPID to Routing Firm MPID
- 3. Routed Order ID (RT) or Sent to Routed Order ID (OR) to Routed Order ID
- 4. Issue Symbol
- 5. Order Sent Timestamp (Date portion) to Order Received Timestamp (Date portion)

For Route Reports submitted to OATS that are not marked late, or are submitted to OATS one business day late (i.e., second OATS Reporting Day after the order event has occurred), OATS attempts to match to new order type events submitted to OATS on the same OATS Reporting Day as the Route Report and one additional OATS Reporting Day. If no corresponding new type OATS event is found with the exact same values in these fields, the OATS Route Report is considered to be unmatched. For OATS Route Received Reports remaining unmatched after the second OATS Reporting Day, OATS will attempt to match those Route Reports against any late reported new type events received through T+30.

Route Reports where a match to a late new type event is found will be credited to the receiving firm and will appear as reconciled events in the matching statistics on the OATS website. If after 30 business days, OATS does not find a matching late new type event with the exact same values in these fields, the OATS report is considered to be unmatched.

Each unmatched order will have one associated error message. (For a list of Unmatched Reason Codes, refer to Appendix B). The primary reasons for unmatched orders include:

- Late Reported ROEs Route or Combined Order/Route is reported more than one OATS business day after the order was routed.
- Routed Order ID/Sent to Routed Order ID-value supplied to OATS does not match to a corresponding Receiving Firm Order for the Order Sent Date.
- Sent to Firm MPID A Routed Order ID was identified in the Receiving Firm Order data; however, the Sent To/Order Receiving Firm MPIDs did not match.

6.9 Unlinked Trade Reports

OATS will attempt to find the related OATS Execution or Combined Order/Execution Report for all trades reported to a FINRA transaction reporting system that meet the eligibility criteria

described in the OATS Report entitled "FINRA Guidance on the OATS Reverse Linkage Process" using the matching criteria described in Section 6.5.

OATS attempts to find a related Execution or Combined Order/Execution Report submitted to OATS on T+1 for the trades reported to a FINRA transaction reporting system on trade date (Day T). If OATS cannot find a corresponding Execution or Combined Order/Execution Report with the exact same values in the match criteria fields, the trade report is considered to be unlinked.

Unlinked trade reports may be retrieved via the OATS Web Interface on T+2.

6.10 Unlinked Exchange Orders

OATS will attempt to find the related OATS Route or Combined Order/ Route Report for all eligible exchange orders that meet the eligibility criteria described in the OATS Report entitled "FINRA Guidance on OATS Reverse Linkage Process" ⁷ using the matching criteria described in Section 6.6.

OATS attempts to find a related Route or Combined Order/ Route Report submitted to OATS on T+1 for exchange orders with the corresponding trade date. If OATS cannot find a corresponding Route or Combined Order/Route report with the exact same values in the match criteria fields, the exchange order is considered to be unlinked.

Unlinked exchange orders may be retrieved via the OATS Web Interface on T+2.

6.11 Unlinked New Order Reports

OATS will attempt to find the related OATS Route or Combined Order/Route Report for all eligible New, Combined Order/Execution and Combined Order/Route Reports that meet the eligibility criteria described in the OATS Report entitled "FINRA Guidance on OATS Reverse Linkage Process" using the matching criteria described in Section 6.7.

OATS attempts to find a related Route or Combined Order/ Route Report reported on T+1 for new order events reported on T+1. If OATS cannot find a corresponding Route or Combined Order/Route Report with the exact same values in the match criteria fields, the OATS new order event is considered to be unlinked.

Unlinked new order events may be retrieved via the OATS Web Interface on T+2.

6.12 Firm-Generated Corrections and Deletions

A firm may determine through routine data reconciliation procedures that information previously sent to and accepted by OATS is invalid. OATS provides two mechanisms to correct inaccurate reports: corrections and deletions. Corrections are made in response to data entry errors that resulted in one or more values within a ROE being entered incorrectly at the firm. Deletions are made in

⁶ Refer to the OATS Report entitled "FINRA Guidance on the OATS Reverse Linkage Process" using the following link: http://www.finra.org/industry/oats/finra-guidance-oats-reverse-linkage-process

 $^{7\} Refer to the OATS\ Report\ entitled\ ``FINRA\ Guidance\ on\ the\ OATS\ Reverse\ Linkage\ Process"\ using\ the\ following\ link: \\ \underline{http://www.finra.org/industry/oats/finra-guidance-oats-reverse-linkage-process}$

response to order events that did not actually occur but were mistakenly reported. Firms that utilize a Reporting Agent(s) may need to coordinate with them to ensure that its ROE rejections are repaired and resubmitted in a timely manner.

All accepted New Order and Cancel/Replace Reports that have a Time in Force Code of 'GTC', 'GTD' or 'GTM' must be corrected within two years, or as soon as possible, after they are accepted by OATS; all other accepted order reports must be corrected within 5 business days after OATS accepts the original New Order or Cancel/Replace Report. For example, if you submit an order to OATS on Friday and OATS accepts it by 08:00 Eastern Time on Saturday, you must submit all related order events by 08:00 Eastern Time the following Friday. Order reports that are submitted later than this deadline will be rejected for context.

6.12.1 Corrections

A firm may submit a correction to OATS if it is found that one or more values for a ROE were incorrect. A firm may only correct an order event if there was a mistake, such as a data entry error on the part of an individual entering order event information or by an automated system. For instance, if the order quantity was mistakenly entered as 100 rather than 1000, the firm could correct the error using a correction report. However, if the customer requested that the order quantity be changed from 100 to 1000 shares, the firm must generate a Cancel/Replace Report. Corrections should be submitted as soon as possible after the error is identified.

The following rules apply to correcting a ROE:

- 1. The firm must submit a pair of ROEs, the first to identify the ROE in error, and the second to replace the ROE in error.
- 2. The original ROE and the corrected ROE must be placed in sequence in a single FORE. If the corrected ROE does not immediately follow the original ROE, both events will be rejected.
- 3. The Action Type Code for the ROE in error must be set to 'R'. This indicates that the ROE will be replaced by a subsequent ROE. All information contained in the original ROE must be repeated in the corrected ROE.
- 4. The Action Type Code for the corrected ROE must be set to 'C'. All information associated with the original event must be repeated in the corrected ROE, not just the information that changed.
- 5. The Correction/Deletion Timestamp for both ROEs must be set to the date and time the correction was made by the firm.
- 6. Corrected ROEs cannot be used to change the three-part key used by OATS to identify the order. These fields include the Order Receiving Firm Order ID, the Order Receiving Firm Order Received Date, and the Order Receiving Firm MPID. If one of these fields was submitted in error, a Deletion Report should be submitted for the incorrect report. (See Section 6.12.2.) The corrected ROE should then be submitted with an Action Type Code of 'N'.
- 7. Corrected ROEs cannot be used to change the replaced key of a Cancel/Replace report, which is used by OATS to identify the cancelled order. These fields include the Replaced Order Received Date and the Replaced Firm Order ID. If one of these fields was submitted in error, a Deletion Report should be submitted for the incorrect report.

- (See Section 6.12.2.) The corrected ROE should then be submitted with an Action Type Code of 'N'.
- 8. Corrected ROEs cannot be used to change the Issue Symbol. If an order with an incorrect Issue Symbol was submitted in error, a Deletion Report should be submitted for the incorrect report. (See Section 6.9.2) The corrected ROE should then be submitted with an Action Type Code of 'N'.
- 9. A corrected ROE should only be submitted for events previously accepted by OATS; a corrected ROE should NOT be generated for rejected ROEs. (See Section 6.2 for ROE Repair procedures.)
- 10. Corrected ROEs may be commingled with ROEs of other Action Type Codes in a FORE, or they may be submitted in a separate file.

6.12.2 Deletions

If a ROE was mistakenly sent to OATS with information about an order event that did not actually take place, the firm should delete the previously-submitted ROE. For instance, if the firm mistakenly reported that an order was cancelled when in fact it was executed, the Cancel Report should be deleted. Deletion reports can also be used to correct the three-part key used by OATS to identify the order or to correct an Issue Symbol. Deletions should be submitted as soon as possible after the error is identified.

The following rules apply to deleting a ROE.

- 1. The Action Type Code for the ROE to be deleted must be set to 'D'. All information contained in the original ROE must be repeated in the deleted ROE.
- 2. The Correction/Deletion Timestamp for the deleted ROE must be set to the date and time the event was deleted by the firm.
- 3. A deleted ROE should be used to change the three-part key used by OATS to identify the order. These fields include the Order Receiving Firm Order ID, the Order Receiving Firm Order Received Date, and the Order Receiving Firm MPID. If one of these fields was submitted in error, a deleted ROE should be submitted for the incorrect report. The revised report should then be submitted with an Action Type Code of 'N'.
- 4. A deleted ROE should be used to change the replaced key of a Cancel/Replace report, which is used by OATS to identify the cancelled order. These fields include the Replaced Order Received Date and the Replaced Firm Order ID. If one of these fields was submitted in error, a Deletion Report should be submitted for the incorrect report. The corrected ROE should then be submitted with an Action Type Code of 'N'.
- 5. A deleted ROE should be used to change the Issue Symbol of a previously submitted order. If an order with an incorrect Issue Symbol was submitted in error, a Deletion Report should be submitted for the incorrect report. The corrected ROE should then be submitted with an Action Type Code of 'N'.
- 6. A deleted ROE should only be submitted for events previously accepted by OATS. A deleted ROE should NOT be generated for rejected ROEs. (See Section 6.2 for ROE Repair procedures.)

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FEEDBACK AND CORRECTIONS

7. Deleted ROEs may be commingled with ROEs of other Action Type Codes in a FORE, or they may be submitted in a separate file.

7. Testing

OATS provides an independent environment for testing. All parties transmitting information to OATS should test their order reporting systems thoroughly before they begin reporting production data. Testing is available before and during production. OSOs may access the test environment any time to retest order-reporting systems. Parties that have not successfully tested in the OATS test environment are not able to submit order data to the OATS production environment.

Before testing with the OATS application can begin, OSOs must register with OATS to obtain a valid User ID and password. Refer to Chapter 3, System Access, for information on how to Register with OATS and the transmission methods available to users.

FINRA encourages OSOs to test actual market data and volume. All OATS reportable securities are valid for testing. Any symbols for securities which are not OATS reportable will be rejected by the OATS test environment.

OATS processes all order data it receives in the test environment in the same way as in the production environment; for example, after sending order data to OATS, firms are able to obtain or view feedback on the status of that data. The only difference between the test and production environments are the addresses used to contact OATS (presented in Table 3-3 in Chapter 3, System Access).

The OATS test environment is available 24 hours per day from 8:00 a.m. Eastern Time on Monday to 8:00 a.m. Eastern Time on Saturday. FINRA Business and Technology Support Services provides technology support during that same time period, but provides business support only between Monday and Friday, 8:00 a.m. to 6:00 p.m., Eastern Time.

The OATS test environment will be available after reporting to the production environment begins; for instance, if changes are made to an OSO's order processing system after production begins, that processing system should be thoroughly tested before transmitting files to the production environment.

NOTE: Testing does not alleviate the firm from its responsibility to continue to submit data to Production unless otherwise specified.

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8. Additional Information

The following information is important for member firms that must meet the requirements of FINRA Rules 7400 through 7470. It provides requirements not covered elsewhere and gives information about where to seek assistance for understanding these technical specifications.

8.1 OATS Reporting Hours and Late Criteria

OATS will accept FORE files 24 hours per day, 5 days per week, from 08:00 Eastern Time on Monday to 08:00 Eastern Time on Saturday. Events that occurred during a particular OATS Business Day may be reported anytime between the time the event occurred and the reporting deadline, which is 08:00 a.m. Eastern Time on the following calendar day. Reports received after the deadline will be marked late by OATS. An OATS Business Day begins at 16:00:01 Eastern Time on one market day and ends at 16:00:00 Eastern Time on the next market day. Table 8-1 illustrates the time periods involved.

NOTE: All times are reflected in military (24 hour clock) time.

Event Occurs	Holiday	Business Day	Report Due to OATS
Wednesday 15:15 ET	N/A	Wednesday	Thursday 08:00 ET
Wednesday 17:30 ET	N/A	Thursday	Friday 08:00 ET
Friday 10:00 ET	N/A	Friday	Saturday 08:00 ET
Friday 19:30 ET	N/A	Monday	Tuesday 08:00 ET
Friday 19:30 ET	Following Monday	Tuesday	Wednesday 08:00 ET
Saturday 06:00 ET	N/A	Monday	Tuesday 08:00 ET
Monday 14:00 ET	Monday	Tuesday	Wednesday 08:00 ET

Table 8-1. Scenarios for OATS Order Reporting Hours

8.2 Deadlines for ROE Submission

All order events that occur during a particular OATS Business Day must be reported by 08:00 a.m. Eastern Time the following calendar day. Order reports that are submitted later than this deadline will be marked late by OATS.

New Order, Cancel/Replace, Combined Order/Execution and Combined Order/Route Reports that have a Time in Force Code of 'GTC', 'GTD, or 'GTM' remain on line in the OATS system for **two years**. Subsequent events associated with these orders, therefore, must be reported within two years of the original order submission or they will be rejected for context.

New Order, Cancel/Replace, Combined Order/Execution and Combined Order/Route Reports that do not have a Time in Force Code of 'GTC', 'GTD, or 'GTM' remain on line in the OATS system for **five days** from the date when Context Rejections are available. Subsequent events associated with these orders, therefore, must be reported within five days of the original order submission or they will be rejected for context.

The five OATS Business Days allowed between OATS' acceptance of a New Order, Cancel/Replace, Combined Order/Execution or Combined Order/Route Reports and subsequent events related to those orders begins on the OATS Reporting Day that OATS accepted the original order submission and ends four OATS Reporting Days later. For example, if an order is

submitted to OATS on Friday and OATS accepts it by 08:00 a.m. Eastern Time on Saturday, all related order events must be submitted by 08:00 a.m. Eastern Time the following Friday.

8.3 Deadline for ROE Rejection Repair

ROE Rejections are provided back to firms as per the following timeline:

- **Syntax and Semantics** available within 4 hours of receipt of an accepted FORE status message.
- Context Checking available within 24 hours after the OATS Reporting deadline.

Once rejections are available, repairs can be made immediately.

All ROE Rejections that require repair must be repaired and resubmitted within **five OATS Business Days** from the date when Context Rejections are available. ROE Repairs received after this day will be considered as late repairs.

Firms are responsible for researching and repairing their own ROE rejections. Firms that utilize a Reporting Agent(s) may need to coordinate with them to ensure that its ROE rejections are repaired and resubmitted in a timely manner.

8.4 Deadline for ROE Corrections and Deletions

New Order, Cancel/Replace, Combined Order/Execution and Combined Order/Route Reports that have a Time in Force Code of 'GTC', 'GTD, or 'GTM' remain on line in the OATS system for **two years**. Corrections and deletions associated with these orders, therefore, must be reported within two years of the original order submission or they will be rejected for context.

New Order, Cancel/Replace, Combined Order/Execution and Combined Order/Route Reports that do not have a Time in Force Code of 'GTC', 'GTD, or 'GTM' remain on line in the OATS system for **five days** from the date when Context Rejections are available. Corrections and deletions associated with these orders, therefore, must be reported within five days of the original order submission or they will be rejected for context. (See NOTE below)

The five OATS Business Days allowed between OATS' acceptance of a New Order, Cancel/Replace, Combined Order/Execution or Combined Order/Route Reports and repairs related to those orders begins on the OATS Reporting Day that OATS accepted the original order submission and ends four OATS Reporting Days later. For example, if an order is submitted to OATS on Friday and OATS accepts it by 08:00 a.m. Eastern Time on Saturday, all related order events must be submitted by 08:00 a.m. Eastern Time the following Friday.

8.5 Data Retention Requirements

As stated in FINRA Rule 7440, each reporting member must retain records of the information required to be recorded under this rule in accordance with FINRA Rule 3110 and SEC Rule 17a-4(b). Thus, OATS records must be preserved at least three years, the first two years in an accessible place.

8.6 FINRA Business and Technology Support Services

FINRA Business and Technology Support Services is the primary source of information about OATS. It can be used as a source for answers to questions about interpretation of FINRA Rules 7400 through 7470, clock synchronization, member firm reporting responsibilities, technical specifications for reporting to FINRA, OATS publications, deadlines, OATS Announcements, and more.

FINRA Business and Technology Support Services can be reached by phone, fax, or e-mail. Technology support is available from 8:00 a.m. Monday to 8:00 a.m. Saturday, Eastern Time. Business support is available Monday through Friday, 8:00 a.m. to 6:00 p.m., Eastern Time. In addition, FINRA Business and Technology Support Services publish information about OATS on a Web Page on the FINRA Web Site. Please provide your name, title, firm's name, Broker/Dealer Number, and a phone number when contacting FINRA Business and Technology Support Services via phone, fax, or e-mail.

Technical Support Business Support

Telephone: 800-321-6273 800-321-6273 Fax: 240-386-6499 240-386-4841

E-mail: supportservices@finra.org supportservices@finra.org
Web: http://www.finra.org http://www.finra.org

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ADDITIONAL INFORMATION

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Appendix A – Data Dictionary

Name	Permitted Values and Description	Definition
Account Type Code	A Institutional Customer – An institutional account as defined in FINRA Rule 4512(c)	Represents the type of beneficial owner of the account for which an order was received or originated.
	C Combined – An order representing more than one type of account	
	E Employee Account – An employee or associated person of a member firm	
	I Individual Customer – An account that does not meet the definition of FINRA Rule 4512(c) and is also not a proprietary account.	
	O Market Making	
	P Other Proprietary	
	U Unknown – Beneficial owner is not known	
	X Error Account – Error account of the firm	
Action Type Code	N New order event	Indicates the purpose of the Order Report,
	C Corrected order event	whether to report a new event to OATS, to
	D Deleted order event	correct a previously reported event, to delete a previously reported event, or to delete a
	R Delete for replacement order event	previously reported event with the intention of correcting it.
ADF Quote ID		Indicates the Quote Identifier provided by the ADF.
Arbitrage Code	 Y Part of an arbitrage strategy N Not part of an arbitrage strategy X Not known (not an accepted value for retail or employee orders) 	Indicates if an order is part of an arbitrage trading strategy involving the purchase or sale of a "basket" or group of securities in conjunction with the purchase or sale (or intended purchase or sale) of one or more cash–settled options or futures contracts on index stock groups, or options on any such futures contracts in an attempt to profit by the price difference, as further defined in New
ATS Display Indicator	S ATS displays orders outside of the ATS to Subscribers	York Stock Exchange Rule 132B. Indicates whether the Order Receiving Firm MPID is an ATS and whether the order is

APPENDIX A -DATA DICTIONARY

Name	Permitted Values and Description	Definition
	only Y ATS displays orders outside of the ATS via public quotation N ATS does not display orders outside of the ATS Not an ATS	displayed outside of ATS to subscribers only or via publicly disseminated quotation data.
ATS Order Type	Unique order type identifier representing the specific order type provided to FINRA by the ATS.	Unique identifier representing the specific order type offered by the ATS. Pursuant to FINRA Rule 4554, ATSs are required to provide FINRA with a list of all of its order types twenty days before such order types become effective, and if the ATS makes any subsequent changes to its order types, twenty days before such changes become effective.
Buy/Sell Code	B Buy SL Sell Long SS Short Sale SX Short Exempt	Indicates if an order is an instruction to buy or to sell shares of a security.
Calculated Record Count		Total number of order entry records in the FORE file as calculated by OATS. NOTE: This does not include the header and the trailer.
Cancel Leaves Quantity		The number of shares remaining open when an order is partially cancelled.
Cancel Quantity		The number of shares cancelled for a partial cancel. Values are any integer greater than zero.
Cancel Type Flag	 F Full–Cancel quantity equals total shares quantity of the order P Partial–Cancel quantity is less than the total shares quantity of the order 	Indicates if the cancellation was a full or partial cancellation.
Cancelled by Flag	Order cancelled by customer or client Cancelled by member receiving or originating the order	Indicates whether the order was cancelled by the customer or client that placed the order, or the member that received or originated the order.
Capacity Code	A Agency P Principal	The capacity in which the firm acted for purposes of the transaction. The capacity

APPENDIX A -DATA DICTIONARY

Name	Per	rmitted Values and Description	Definition
	R	Riskless Principal	needs to be the same capacity that is reported to the applicable transaction reporting system for trade reporting purposes.
Connection ID			The unique identifier representing the name of the connection used when routing to another firm or national securities exchange. The Connection ID is an optional field that may be populated to guarantee uniqueness for a Routed Order ID / Sent to Routed Order ID. If populated, the Connection ID will be included as match criteria in the Exchange Route Matching process.
Continuation	Y N	Continuation Not a continuation	Indicates that this ROE rejection description record is the continuation of the previous description record.
Correction/Deletion Timestamp			The date and time a correction or a deletion to an order was effective. The alphanumeric string must use the format YYYYMMDDHHMMSSCCC where YYYY is the four-digit number for calendar year, MM is the two-digit number for the current month of the year, DD is the two-digit number for the current day of the month, HH is the two-digit number (using a 24-hour clock) for the current hour of the day, MM is the two-digit number for the current minute of the hour, SS is the current second of the minute, and CCC is the milliseconds.
Customer Instruction Flag	Y N	Yes. Customer has instructed that a limit order should not be displayed or that a block size order be displayed. No. No instruction has been received from the customer that a limit order should not be displayed or that a block size order be displayed.	Indicates if a customer has instructed that a limit order should not be displayed or that a block size order be displayed. For additional information, refer to NTM 00–26.
Desk Received Timestamp			The date and time the order was received by a desk or department from another desk or department. The alphanumeric string must use the format YYYYMMDDHHMMSSCCC where YYYY is the four–digit number for calendar year, MM is the two–digit number for the

APPENDIX A -DATA DICTIONARY

Name	Permitted Values and Description	Definition
		current month of the year, DD is the two—digit number for the current day of the month, HH is the two—digit number (using a 24—hour clock) for the current hour of the day, MM is the two—digit number for the current minute of the hour, SS is the current second of the minute, and CCC is the milliseconds.
Desk Shares Quantity		The Shares Quantity on the order received by a desk or department within the firm from another desk or department. Values are any integer greater than zero.
Desk Special Handling Code 1 (Maximum of 5 codes)	See Special Handling Code 1	See Special Handling Code 1
Desk Special Handling Code 2 (Maximum of 5 codes)	See Special Handling Code 1	See Special Handling Code 1
Desk Special Handling Code 3 (Maximum of 5 codes)	See Special Handling Code 1	See Special Handling Code 1
Desk Special Handling Code 4 (Maximum of 5 codes)	See Special Handling Code 1	See Special Handling Code 1
Desk Special Handling Code 5 (Maximum of 5 codes)	See Special Handling Code 1	See Special Handling Code 1
Desk Type Code	A Agency AR Arbitrage B Block Trading C Convertible Desk CR Central Risk Books D Derivatives EC Equity Capital Markets IN International IS Institutional O Other PF Preferred Trading PR Proprietary PT Program Trading S Sales SW Swaps T Trading Desk	Indicates the type of Desk or Department to which the order was transmitted.
Destination Code	TR Treasury A Reportable Non-Member Affiliate E ECN	Indicates whether the Route Report or Combined Order/Route Report was routed to

Name	Permitted Values and Description	Definition
	M FINRA Member	a FINRA Member, Reportable Non-FINRA
	N Reportable Non-Member , Not an Affiliate	Member, ECN, Foreign BD, or Exchange.
	F Foreign Affiliate	
	X Foreign BD, not an Affiliate	
	Exchanges:	
	XA NYSE MKT	
	XB NASDAQ OMX BX	
	XC National Stock Exchange	
	XF Non-US Exchange	
	XI International Securities Exchange	
	XJ EDGA Exchange	
	XK EDGX Exchange	
	XM Chicago Stock Exchange	
	XN New York Stock Exchange	
	XO Bourse de Montreal	
	XP NYSE Arca	
	XQ The NASDAQ Stock Market	
	XT Toronto Stock Exchange	
	XV Investors Exchange	
	XW CBOE Stock Exchange	
	XX NASDAQ OMX PHLX	
	XY BATS BYX Exchange	
	XZ BATS BZX Exchange	
	Options Exchanges:	
	OA NYSE MKT Options	
	OB Boston Options Exchange, LLC	
	OC Chicago Board Options Exchange	
	OE BATS EDGX Options Exchange	
	OH ISE Gemini	
	OI International Securities Exchange	
	OJ C2 Options Exchange	
	OM MIAX Options Exchange	
	OP NYSE Arca Options	
	OT NASDAQ OMX BX Options	
	OQ NASDAQ OMX Options	
	OX NASDAQ OMX PHLX Options	

Name	Permitted Values and Description	Definition
	OZ BATS Option Exchange	
Display Size		Number of shares displayed.
Display Price		Displayed price.
Do Not Reduce/Do Not Increase Code	 	Indicates if the customer has specified that the order price or shares quantity not be adjusted to reflect a cash or stock dividend.
End of Record Marker	LF Line Feed CR/LF Carriage Return/Line Feed	End of record marker for the Header Record, the Trailer Record, or specified record type.
Exception Code		The numeric value code for a FORE exception. See Appendix B, Error Messages, for a list of FORE exceptions.
Exception Code Description		A text description of the FORE exception code.
Exception Type Code	W Warning E Error	Specifies the type of FORE exception that occurred.
Exchange Participant ID		Firm identifier assigned by the exchange. Required for all orders routed to an exchange. For example: For orders routed to The NASDAQ Stock Market, NASDAQ OMX BX and NASDAQ OMX PHLX enter the MPID. For orders routed to the New York Stock Exchange and NYSE MKT enter the entering firm mnemonic. For orders routed to NYSE Arca, enter the Equity Trading Permit ID.
Execution Price		The price at which the order is ultimately executed. This price needs to be the same price that is reported to the applicable transaction reporting association for trade reporting purposes.
Execution Quantity		The number of shares filled in an execution. Values are any integer greater than zero.
Execution Timestamp		The date and time of an execution. The alphanumeric string must use the format YYYYMMDDHHMMSSCCC where YYYY is the four-digit number for calendar year, MM is the two-digit number for the current month of the year, DD is the two-digit number for the current day of the month,

Name	Permitted Values and Description	Definition
		HH is the two-digit number (using a 24-hour clock) for the current hour of the day, MM is the two-digit number for the current minute of the hour, SS is the current second of the minute, and CCC is the milliseconds.
Execution Type Indicator	 F Full-Execution equals total shares quantity of the order P Partial-Execution is less than the total shares quantity of the order 	Indicates if the execution was a full or partial execution.
Expiration Date		The date on which an order expires. The alphanumeric string must use the format YYYYMMDD where YYYY is the fourdigit number for calendar year, MM is the two-digit number for the current month of the year, and DD is the two-digit number for the current day of the month.
Expiration Time		The time at which an order with a Time in Force Code value of Good Till Time expires. The alphanumeric string must use the format HHMMSSCCC where HH is the two–digit number (using a 24–hour clock) for the current hour of the day, MM is the two–digit number for the current minute of the hour, SS is the current second of the minute, and CCC is the milliseconds.
Firm FORE ID		Identifier assigned by the OSO to uniquely identify the FORE within the file generation date.
Firm ROE ID		An identifier assigned to a ROE by the reporting firm.
FORE Memo		Free form text field for firm use.
FORE Received Timestamp		The date and time that a FORE was received by OATS.
FORE Status	A Accepted R Rejected	Indicates if the FORE was accepted or rejected by OATS.
FORE Validated Timestamp		The date and time that a FORE was validated by OATS.
Generation Date		The date the FORE file was generated. The alphanumeric string must use the format YYYYMMDD, where YYYY is the fourdigit number for calendar year, MM is the

Name	Permitted Values and Description	Definition
		two-digit number for the current month of the year, DD is the two-digit number for the current day of the month.
Information Barrier ID		The identifier of the information barrier in place for a trading unit that will meet the criteria of the "no-knowledge" exception in FINRA Rule 5320.02.
Issue Symbol ID		The unique symbol for an OATS reportable security. For exchange listed securities, the symbol format must follow the format published by the primary listing market.
ISO Indicator	Y Intermarket Sweep Order T Trade-at Intermarket Sweep Order Order Order	Indicates the order was routed as an Intermarket Sweep Order (ISO) or Trade-at Intermarket Sweep Order (TAI).
Last File	Y Last file N Not last file	Indicate the last ROE rejection file for the generation date.
Leaves Quantity		The quantity of shares remaining open in a partially executed order.
Limit Price		The per–share maximum buy price or minimum sell price for a limit order or stop limit order; this is the price at which the customer is protected.
Market Center ID	A NYSE MKT B NASDAQ OMX BX C National Stock Exchange F Non-Us Exchange I International Securities Exchange J EDGA Exchange K EDGX Exchange M Chicago Stock Exchange N New York Stock Exchange P NYSE Arca Q The NASDAQ Stock Market V Investors Exchange W CBOE Stock Exchange X NASDAQ OMX PHLX Y BATS BYX Exchange	The national securities exchange or transaction reporting system operated by registered securities association where the trade was reported.

Name	Permitted	l Values and Description	Definition
	Z BAT	S BZX Exchange	
	FINRA transaction reporting systems:		
		RA/NYSE Trade Reporting ity	
	D ADF		
		RA/NASDAQ Trade orting Facility	
	O OTC	Reporting Facility	
Member Type Code	if rec Custo	ortable Non-Member Affiliate seived from another BD, or a somer Affiliate if not received a BD	Indicates from where the order was received.
	C ECN		
	meet	RA Member Firm does not the definition of reporting ber under FINRA Rule 7410	
	F Fore	ign Affiliate	
	M FINE	RA Member	
	affili BD,	ortable Non-Member (not an ate) if received from another or a Customer (not an ate) if not received from a BD	
	X Fore	ign BD, not an Affiliate	
Modified by Flag	C Orde	r modified by customer or t	Indicates whether the order was modified by the customer or client that placed the order,
		ified by member receiving or nating the order	or the member that received or originated the order.
NBBO Bid Price			Indicates the NBB price in effect at the time of order receipt.
NBBO Ask Price			Indicates the NBO price in effect at the time of order receipt.
NBBO Source	D I	Direct Feed	Indicates the market data feed used to obtain
	н н	Iybrid	the NBBO (or relevant reference price) at the time of order receipt.
	S S	SIP	
NBBO Matching Engine Lookup Date			Indicates the date on which the NBBO was referenced upon receipt of the order by the

Name	Permitted Values and Description	Definition
		matching engine.
NBBO Matching Engine Lookup Time		Indicates the time at which the NBBO was referenced upon receipt of the order by the matching engine.
NBBO Bid Price at Execution		Indicates the NBB price in effect immediately prior to order execution.
NBBO Ask Price at Execution		Indicates the NBO price in effect immediately prior to order execution.
NBBO Source at Execution	D Direct Feed H Hybrid S SIP	Indicates the market data feed used to obtain the NBBO (or relevant reference price) immediately prior to order execution.
NBBO Matching Engine Lookup Date at Execution		Indicates the date on which the NBBO was referenced by the matching engine immediately prior to order execution.
NBBO Matching Engine Lookup Time at Execution		Indicates the time at which the NBBO was referenced by the matching engine immediately prior to order execution.
Negotiated Trade Flag	Y Indicates respondent portion of a negotiated trade Not applicable	The Negotiated Trade Flag identifies orders that are the result of a negotiated trade between two members where both members, for OATS purposes, are considered to have executed the trade and must submit an Execution Report to OATS. Examples include negotiated telephone trades or trades executed as the result of an electronic negotiation system such as Pink Link operated by OTC Markets.
		The flag should never be used in an order routing scenario where an order is routed to another member for further handling and execution. The flag should be set to Y when a member is required to report a new order and execution as the result of an incoming negotiation that results in a trade. For example, if a member receives a Pink Link message or a telephone call and agrees to execute a trade as a result of such Pink Link message or telephone call, the member would report a New Order and Execution Report or

Name	Permitted Values and Description	Definition
		Combined Order/Execution with the Negotiated Trade Flag set to Y.
OATS Trade ID (Formerly Branch/Sequence Number)		The OATS Trade ID assigned to an order by the order receiving firm, as reported to a FINRA transaction reporting system.
		Must be provided when a trade is executed by the member and reported to a FINRA transaction reporting system.
		Must be unique within the firm within the day except in instances involving an agency cross where one side of the cross is comprised of multiple orders. Each of the orders on the same side of market involved in the single agency cross execution may share the same OATS Trade ID.
Order Cancel Timestamp		The date and time a cancellation was originated or received. The alphanumeric string must use the format YYYYMMDDHHMMSSCCC where YYYY is the four-digit number for calendar year, MM is the two-digit number for the current month of the year, DD is the two-digit number for the current day of the month, HH is the two-digit number (using a 24-hour clock) for the current hour of the day, MM is the two-digit number for the current minute of the hour, SS is the current second of the minute, and CCC is the milliseconds.
Order Event Type Code	NW New Order Report RT Route Report DS Desk Report	Indicates the type of Order Event received by OATS.
	EX Execution Report	
	CL Cancel Report CR Cancel/Replace Report	
	OE Combined Order/	
	Execution Report	
	OR Combined Order/Route Report	
Order Origination Code	F Order was received from a customer or originated with the Firm	Identifies whether the order was received from a customer of the firm, originated by the firm, or whether the order was received from
	W Received from another Broker/Dealer	another Broker/Dealer.

Name	Permitted Values and Description	Definition
Order Received Timestamp		The date and time the order was received or originated. The alphanumeric string must use the format YYYYMMDDHHMMSSCCC where YYYY is the four-digit number for calendar year, MM is the two-digit number for the current month of the year, DD is the two-digit number for the current day of the month, HH is the two-digit number (using a 24-hour clock) for the current hour of the day, MM is the two-digit number for the current minute of the hour, SS is the current second of the minute, and CCC is the milliseconds.
Order Receiving Firm MPID		The –MPID of the member firm that received the order.
Order Receiving Firm Order ID		The identifier assigned to an order by the order receiving firm to uniquely identify the order for the firm within the order received date.
Order Receiving Firm Order Received Date		The date and time the order was received by the order receiving firm. Date portion must equal the date portion of the Order Received Timestamp (for orders received on or after October 17, 2011). The alphanumeric string must use the format YYYYMMDDHHMMSSCCC where YYYY is the four–digit number for calendar year, MM is the two–digit number for the current month of the year, and DD is the two–digit number for the current day of the month, HH is the two–digit number (using a 24–hour clock) for the current hour of the day, MM is the two–digit number for the current minute of the hour, SS is the current second of the minute, and CCC is the milliseconds.
Order Sent Timestamp		The date and time the order was sent outside the firm. The alphanumeric string must use the format YYYYMMDDHHMMSSCCC where YYYY is the four-digit number for calendar year, MM is the two-digit number for the current month of the year, DD is the two-digit number for the current day of the month, HH is the two-digit number (using a 24-hour clock) for the current hour of the day, MM is the two-digit number for the

Name	Permitted Values and Description	Definition
		current minute of the hour, SS is the current second of the minute, and CCC is the milliseconds.
Order Display Modification Timestamp		Indicates the timestamp of the order display modification.
Originating Department ID	A Agency - A desk or department where orders may be routed to other market centers, either by a trading system or with the assistance of traders. This would include smart routers and algorithmic trading. ATS A trading system that meets the definition of "Alternative Trading System" under Regulation ATS. T Trading - A desk or department where orders are executed. This may be interpreted as either a trading system or a desk or department where orders are executed with the assistance of traders. O Other - A department that does not execute orders or make routing decisions.	An identifier representing the department or desk within the firm that originated the order.
Originating MPID		An identifier used in instances of a merger or acquisition where the originating firm had open limit orders on its books that will be executed or otherwise resolved under the surviving firm. Must be provided when the MPID of the original Order Receiving Firm needs to link
		to a secondary event with a different Order Receiving Firm MPID.
OSO ID		Order Sending Organization ID–a unique identifier assigned to an Order Sending Organization by FINRA.
Participation Flag	<blank> Firm is neither a Tick Size Pilot Trading Center nor an ADF Trading Center T Firm is a Tick Size Pilot Trading Center; firm is not an</blank>	Indicates if a firm operates a Trading Center under the Plan to Implement a Tick Size Pilot Program ("the Plan") in the Issue Symbol ID and whether the firm is an Alternative Display Facility (ADF) Trading Center as defined in FINRA Rule 6220.

Name	Permitted Values and Description	Definition
	ADF Trading Center A Firm is a Tick Size Pilot Trading Center and an ADF Trading Center Y Firm is an ADF Trading Center	
Password		The password for the supplied User ID.
Password Life		Remaining life in the password used by this User ID. NOTE: This will only be supplied when the value is less than 14 days.
Processing Sequence Number		Indicates the Processing Sequence Number assigned to the order by the ATS's matching engine. This field is optional.
Program Trading Code	Y Part of a program trade N Not part of a program trade X Not known	Indicates if an order is part of a program trade, a strategy involving the related purchase or sale of a "basket" or group of 15 or more stocks. Program trading includes the purchases or sales of stocks that are part of a coordinated trading strategy, even if the purchases or sales are neither entered nor executed contemporaneously, nor part of a trading strategy involving options or futures contracts on an index stock group, or options on any such futures contracts, or otherwise relating to a stock market index.
Reason 1–3		Numeric error number indicating reason for ROE rejection.
Received Method Code	E Electronic N Manual	Indicates whether the order was received electronically or manually.
Receiving Department ID	A Agency - A desk or department where orders may be routed to other market centers, either by a trading system or with the assistance of traders. This would include smart routers and algorithmic trading. ATS A trading system that meets the	An identifier representing the department or desk within the firm that received the order.
	definition of "Alternative Trading System" under Regulation ATS. MA Market Access - When a member permits another broker-dealer to use a market participant identifier	

Name	Permitted Values and Description	Definition
	assigned to the member to route orders directly to market centers. T Trading - A desk or department where orders are executed. This may be interpreted as either a trading system or a desk or department where orders are executed with the assistance of traders. O Other - A department that does not execute orders or make routing decisions.	
Record Count		Total number of records in the FORE File, not including header and trailer records.
	#TR# Trailer #OE# New Order Route Desk Execution Cancel Cancel/Replace Combined Order/Execution Combined Order/Route Order Display Modification #RH# Rejected ROE Header #RD# Rejected ROE Description #RT# Rejected ROE Trailer #ST# Status Header	Valid values to be submitted by firm to OATS. Values that are generated by OATS only and returned to the firm.
	#SE# Status Event #SR# Status Trailer #UH# Unmatched Execution Header #UD# Unmatched Execution Description #UT# Unmatched Execution Trailer #EH# Unmatched Exchange Route Header #ED# Unmatched Exchange Route Description #ET# Unmatched Exchange Route	

Name	Permitted Values and Description	Definition
	Trailer #OH# Unmatched Interfirm Route Header #OD# Unmatched Interfirm Route— Orders Routed Description #OT# Unmatched Interfirm Route— Orders Routed Trailer #ID# Unmatched Interfirm Route— Orders Received Description #IH# Unmatched Interfirm Route— Orders Received Trailer	
Rejected ROE Resubmit Flag	Y Resubmitted ROE 	Indicates if the ROE submitted to OATS was previously rejected.
Rejected ROE ID		The unique identifier assigned by OATS to a rejected ROE.
Rejection Text		Text of the originally submitted ROE (delimiters are changed to commas if not originally submitted as commas).
Replaced Firm Order ID		The identifier assigned to an order that was replaced in a Cancel/Replace Report.
Replaced Order Received Date		The date the order being replaced in a Cancel/Replace Report was received. The alphanumeric string must use the format YYYYMMDD where YYYY is the four-digit number for calendar year, MM is the two-digit number for the current month of the year, and DD is the two-digit number for the current day of the month, SS is the current second of the minute, and CCC is the milliseconds.
Reporting Exception Code	 A Agency Average Price Transaction F Reported on Form T pursuant to FINRA Trade Reporting Rules M Execution where a FINRA transaction reporting system constraint prevented the entry of a unique identifier (e.g., Branch Sequence Number, Compliance ID) P Intra–firm order filled from firm's proprietary account 	Indicates the reason that a unique identifier (e.g., Branch Sequence Number, Compliance ID) was not supplied to a transaction reporting system.

Name	Permitted Values and Description	Definition	
	R Riskless principal transaction T Agency Post Trade Allocation		
Reporting OSO ID		The OSO ID assigned to the third party that is authorized to report on a firm's behalf, in addition to the Transmitting OSO.	
Retail Investor Order Flag	Y Trading center is relying upon the Retail Investor Order exception with respect to the order N Trading center is not relying upon the Retail Investor Order exception with respect to the order	Indicates if the Trading Center is relying upon the Retail Investor Order exception to Test Groups Two and Three of the Plan with respect to the order.	
ROE Memo		Free form text field for firm use.	
Routable Flag	Y Order is routable N Order is not routable	Indicates if customer order instructions or the order type permit the order to be routed away from the Trading Center for further handling and execution.	
Routed Order ID		Orders Received:	
		Routing identifier used by the order sending member during the order routing process. Required for all orders received electronically from another Broker/Dealer.	
		Orders Routed:	
		Routing identifier used during the order routing process. Required for all electronically routed orders.	
		Must be unique for the MPID, Order Sent Date, Connection ID, and Sent to MPID (if routed to another FINRA member) or Destination Code and Exchange Participant ID (if routed to a national securities exchange), except for instances when the route has a special routing condition.	
Routed Order Type Indicator	Corder Routed as a Limit Order M Order Routed as a Market Order	Indicates whether an order was routed as a market order or a limit order.	
Route Price		The price at which the order is routed. Required if the Routed Order Type Indicator is set to 'L'. If the Routed Order Type Indicator is set to 'M', this field must be blank.	

Name	Permitted Values and Description	Definition
Routed Shares Quantity		The number of shares routed to another firm. If the order was bunched, this would be the total number of bunched shares routed. Values are any integer greater than zero.
Routing Firm MPID		The MPID of the firm from which the order was received. The MPID of the firm from which the order was received. When populated, must be a valid firm identifier for the Order Received Timestamp. If received from a FINRA member, must be populated with a FINRA member MPID. If received from a Reportable Non-Member broker-dealer, must be populated with a Reportable Non-Member identifier. If received from a Foreign BD, may be blank; must not be populated with a FINRA member MPID or a Reportable Non-Member
		identifier. Must be blank if the order originated with the firm.
Routing Method Code	E Electronic N Manual S Smart Router F NYSE Floor Broker Algorithm	Indicates whether the order was sent electronically, manually, via a Smart Router or via a NYSE Floor Broker Algorithm.
Sent to Firm MPID		The MPID of the firm or Exchange to which the order was routed. When populated, must be a valid firm identifier for the Order Sent Timestamp. If routed to a FINRA member, must be populated with a FINRA member MPID. If routed to a Reportable Non-Member, must be populated with a Reportable Non-Member identifier. If routed to a Foreign BD, may be blank. May be populated for routes to a national securities exchange; however the value will be ignored by OATS.
Sent to Routed Order ID		Routing identifier used during the order routing process.

Name	Permitted Values and Description	Definition	
		Required for all electronically routed orders. Must be unique for the MPID, Order Sent Date, Connection ID, and Sent to Firm MPID (if routed to another FINRA member) or Destination Code and Exchange Participant ID (if routed to a national securities exchange), except for instances when the route has a Special Routing Condition.	
Sequence Number		Sequence number of the ROE rejection files generated for the generation date.	
Shares Quantity		The number of shares indicated in an order to buy or sell. For reserve size orders, must be the sum of displayed size and reserve size. Values are any integer greater than zero.	
Short Sale Exempt Indicator	Y Short Sale Exempt Order <td>Indicates the order may be marked "short exempt" consistent with SEC Rule 201.</td>	Indicates the order may be marked "short exempt" consistent with SEC Rule 201.	
Special Handling Code 1 (Maximum of 5 codes)	ADD Add-on Order- Reflects that the customer added additional shares to the order after it was fully executed; May only be used with Cancel/Replace events.	Additional order instructions that serve to qualify the pricing, quantity, execution timing, or execution method of an order.	
	AOB At or Between – Instructs the trader to execute at a trade price equal to the NBBO or between the NBBO and mid-point.		
	AON All or None – Requires that if an order cannot be filled in its entirety, the order should not be executed.		
	ALO Add Liquidity Only CND Conditional Order – An order where the terms and conditions of the order are derived from a related transaction (other than an option).		
	CNH Cash Not Held – Instructs the trader to buy or sell as much stock as possible, over the course of a trading day, for a specified dollar amount.		
	CPR Counterparty Restriction – Instruction that the order cannot trade against certain		

Name	Permitted Values and Description	Definition
	counterparties. CSH Delivery Instructions: Cash-trade settles on the same trade date DIR Directed Orders – Orders that meet the definition of "Directed Order" under Rule 600(b)(19) of Regulation NMS (formerly defined under SEC Rule 11Ac1–6). That definition specifies that the term directed order shall mean a customer order that the customer specifically instructed the broker or dealer to route to a particular venue for execution. For orders where the Tick Size Flag is populated, the DIR code should also be populated for orders where	
	the broker-dealer is providing direct market access to a non-broker-dealer customer. DLO Discretionary Limit Order — Orders for which the customer defines an amount off the limit price (for example \$.50) to increase the price range over which the limit order is eligible to execute E.W Exchange for Physical Transaction	
	- Equity trade component of an "exchange for physical" transaction. An exchange for physical transaction involves two parties simultaneously executing a futures contract and an equity transaction (for the securities covered by the futures contract), typically involving baskets that replicate common indices.	
	FBA NYSE Floor Broker Algorithm Indicates that the order is routed to the Exchange via a NYSE Floor Broker Algorithm. FOK Fill or Kill – Indicates the order is intended for immediate execution in its entirety, and if not executed	

Name	Permitted Values and Description	Definition	
	in its entirety, the order is cancelled.		
	G G Order – An order for an account covered by 1934 Exchange Act \$11(a) that relies on \$11(a)(1)(G) as an exemption to \$11(a)(1).		
	IDX Intra–Day Cross – An order designated for participation in an Intra–Day cross.		
	IO Imbalance Only – An order to buy or sell at a specified price or better that may be executed only during the Nasdaq Opening/ Closing Cross and only against an imbalance.		
	IOC Immediate or Cancel – Requires all or part of the order be executed immediately, and any remaining shares be cancelled.		
	ISO Intermarket Sweep Order – An order that meets the definition of "Intermarket Sweep Order" under Rule 600(b)(30) of Regulation NMS.		
	LOO Limit on Open – Instructs the trader to execute the order at the opening price provided that the opening price is at or within the limit specified.		
	LOC Limit on Close – Instructs the trader to execute the order at the closing price provided that the closing price is at or within the limit specified.		
	MACMarket at Close – Instructs the trader to execute the order at the closing inside quote price of regular market hours.		
	MAO Market at Open – Instructs the trader to execute the order at the opening inside quote price of regular market hours.		
	MOB Mid-point or Better – Instructs the		

Name	Permitted Values and Description	Definition	
	trader to execute at a trade price equal to the mid-point or better.		
	MOCMarket on Close – Instructs the trader to execute the order at the closing last sale price of regular market hours.		
	MOO Market on Open – Instructs the trader to execute the order at the opening print price of regular market hours.		
	MTL Market to Limit – An order that is sent in as a market order to execute at the current best price. If the entire order does not immediately execute at the market price, the remainder of the order is re—submitted as a limit order with the limit price set to the price at which the original order executed.		
	MQT Minimum Quantity – Instruction to cancel the order if a specified minimum quantity cannot be executed.		
	MPT Merger Related Transfer Position ND Delivery Instructions: Next Day – trade settles on next trade date.		
	NH Not Held – Requires that the trader use best judgment as to the time of execution and the issue price.		
	OPO Opt Out of Locked Market - Client has opted out of trading in a locked market		
	OPT Options Related Transaction – Represents an order where the terms and conditions of the order are derived from a related options transaction.		
	OVD Over the Day – Requires that a trader break up an order into several partial executions. The customer may specify the number of executions.		
	PEG Indicates that the customer's limit price is to be determined by a		

Name	Permitted Values and Description	Definition
	specific market price and/or volume factor or that the limit price should be determined pursuant to a specified formula.	
	RSV Reserve Size Order – Required for an order for which a customer has authorized the public display of part of the full size of the order with the remainder held in reserve on an undisplayed basis to be displayed in whole or in part as the displayed part is executed.	
	S.W Stop Stock Transaction – Any transaction resulting from an order for which a member and another party agree that the order will be executed at a Stop Stock Price or better.	
	SCL Scale – Requires partial executions that are not more than a specified price increment apart (e.g., 1/8 of a point).	
	SLD Slide – Instruction to adjust the limit price to prevent a locked or crossed market.	
	SLR Delivery Instructions: Seller's Option – trade settles on a date determined by a seller.	
	SLQ Stop Limit on Quote – An order that is triggered by a quotation at which point the stopped order becomes a limit order.	
	SOQ Stop on Quote – An order that is triggered by a quotation at which point the stopped order becomes a market order.	
	STP Self Trade Prevention – Instruction to prevent self trading.	
	TAI Trade-at Intermarket Sweep Order - Order was received by the Trading Center marked as a Trade-at ISO.	
	TMOTime Order – Represents an order that becomes a market or limit	

Name	Permitted Values and Description	Definition	
	price order at a specific time. TS Trailing Stop – In the case of a sell order, a Trailing Stop Order allows the stop price to increase by a predetermined amount or formula (e.g. a specified dollar amount, a percentage of the market price, or some other predetermined criteria), as the market price of the security advances. In the case of a buy order, a Trailing Stop Order allows the stop price to decrease by a predetermined amount or formula (e.g. a specified dollar amount, a percentage of the market price, or some other predetermined criteria), as the market price of the security declines. Once the Trailing Stop price is triggered, the buy or sell order becomes either an executable market order or a limit order (i.e. a Trailing Stop Limit Order).		
	WRK Work – Leaves the time of execution to the trader's discretion; either a full execution or partial executions are accepted.		
	F0 Stay on Offerside		
	F3 Go Along F6 Participate Don't Initiate – An order that may participate in a transaction initiated by another party, but may not initiate a transaction. For example, on US ECNs / Exchanges, this may represent an order that will be quoted to the marketplace and will trade if another party initiates a trade (i.e. hits the posted quote), but cannot be routed to initiate a trade with another market or market maker.		
	F7 Strict Scale		
	F8 Try to Scale		

Name	Permitted Values and Description Definition	Definition	
	F9 Stay on Bidside		
	FA No Cross – The broker executing this trade is forbidden from taking the other side of the trade. Opposite of OK to Cross.		
	FB OK to Cross – The broker executing this trade is allowed to take the other side of the trade. Opposite of No Cross.		
	FC Call First – Refer to client before trading.		
	FD Percent of Volume – The sender does not want to be all of the volume.		
	FH Reinstate on System Failure – If a system failure interrupts trading or order routing, attempt to reinstate this order, subject to time in force limitations. Note that depending on the type and severity of the failure, this might not be possible.		
	FI Institutions Only – Broker is restricted to dealing with other buy side firms.		
	FJ Reinstate on Trading Halt – If trading in this instrument is halted, reinstate this order when/if trading resumes, subject to time in force limitations.		
	FK Cancel on Trading Halt–If trading in this instrument is halted, cancel this order and do not reinstate it when/if trading resumes.		
	FL Last Peg		
	FM Mid-price Peg		
	FN Non-negotiable		
	FO Opening Peg		
	FP Market Peg (Aggressive)		
	FQ Cancel on System Failure – If a system failure interrupts trading or order routing, attempt to cancel this order. Note that depending on the type and severity of the failure,		

Name	Permitted Values and Description	Definition
	this might not be possible.	
	FR Primary Peg (Passive)	
	FS Suspend	
	FT Fixed Peg to Local Best Bid or Offer at time of order	
	FW Peg to VWAP	
	FX Trade Along – Clients who specify "Trade Along" give brokers permission to handle and place their order in the market even if the broker already has its own proprietary orders for the same security placed in the market.	
	FY Try to Stop – Used in specialist– driven markets to direct the specialist to try and stop the order.	
	FZ Cancel if Not Best – Indicates that an order should be cancelled if it is no longer the best bid if buying, or the best offer if selling.	
	Fb Strict Limit – A limit order that must be traded at the exact limit price specified without any price improvement.	
	Fc Ignore Price Validity Checks – Disables validity checking of price fields for an order or change request.	
	Fd Peg to Limit Price	
	Fe Work to Target Strategy	
Special Handling Code 2 (Maximum of 5 codes)	See Special Handling Code 1	See Special Handling Code 1
Special Handling Code 3 (Maximum of 5 codes)	See Special Handling Code 1	See Special Handling Code 1
Special Handling Code 4 (Maximum of 5 codes)	See Special Handling Code 1	See Special Handling Code 1
Special Handling Code 5 (Maximum of 5 codes)	See Special Handling Code 1	See Special Handling Code 1
Special Routing Condition	X The identified order has an exchange routing condition that requires a duplicated Routed Order ID	Indicates the Route or Combined Order/Route Report has a special routing condition including: Route is part of a bunched order.

Name	Permitte	ed Values and Description	Definition	
	Y <blank></blank>	The identified order is part of a bunch The identified order does not have a special routing condition	Route represents a modification to an order previously routed to a national securities exchange that includes a duplicated Routed Order ID/Sent to Routed Order ID. The Route I Decide Control of the Indiana.	
			The Special Routing Condition indicator is used to identify instances where the Routed Order ID/	
			Sent to Routed Order ID will be duplicated. Some order modification types accepted by a national securities exchange require firms to use the original order identifier when submitting an order modification. For example, the Fast Cancel function offered by NYSE Arca requires a firm to use the Client Order ID entered with the original order for all subsequent modifications. In these limited situations involving a national securities exchange, a duplicate Routed order ID/Sent To Routed Order ID will be allowed. The Special Routing Condition of 'X' can only be used when routing to a national securities exchange.	
Stop Price			The per–share stop price; the order becomes either a market order or a limit order (i.e. if a Limit Price is specified) once a transaction or quotation in the security has occurred at or through the specified stop price.	
Time in Force Code	 	Market Order–Valid for execution at the prevailing market price	The length of time when an order is valid.	
	DAY	Day Order–Valid until executed or the next market close		
	GTC	Good Till Cancelled–Valid until executed or cancelled by the customer		
	GTD	Good Till Date–Valid until the close of market on a specified date		
	GTM	Good This Month – Valid until the last business day of the month in which the order		

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APPENDIX A -DATA DICTIONARY

Name	Permitted Va	lues and Description	Definition	
	GTT Good	received d Till Time–Valid until pecified time		
TMO Timestamp			The specific date and time that an order becomes a market or limit price order. The alphanumeric string must use the format YYYYMMDDHHMMSSCCC where YYYY is the four-digit number for calendar year, MM is the two-digit number for the current month of the year, DD is the two-digit number for the current day of the month, HH is the two-digit number (using a 24-hour clock) for the current hour of the day, MM is the two-digit number for the current minute of the hour, SS is the current second of the minute, and CCC is the milliseconds.	
Trader Terminal ID			The identifier of the terminal where the order was executed or the identifier of the executing trader.	
Trading Session Code	FOR PRE PREREG REG REGPOST POST PREPOST ALL	To be executed only on a Foreign Market Pre-Market Only Pre-Market and Regular Regular Only Regular and Post-Market Post-Market Only Pre-Market and Post-Market All Sessions	The trading session(s) during which an order is eligible to trade.	
User ID			The User ID assigned to identify the user in OATS.	

Appendix B — **Error Messages**

This section defines the error messages generated by OATS. The first portion defines the messages generated for Firm Order Report files (FOREs) that fail validation checks; the second portion defines the messages generated for Reportable Order Event records (ROEs) that fail validation checks; and the third portion defines the unmatched reasons for ROEs which do not link to a corresponding report.

Firm Order Report Status Messages

The table below details messages that are associated with the FORE Status. The Exception Type Code indicates whether the exception is a Warning ('W') or Error ('E'); the Exception Code is a numeric value for the exception; and the Exception Code Description is a textual description for the Exception Code.

Exception Type Code	Exception Code	Exception Code Description	Explanation
Е	1001	Duplicate FORE	A file with the same Firm FORE ID, Generation Date and User ID has previously been accepted by OATS.
Е	1003	Missing or invalid User ID	User ID in the Header record is missing or invalid. (e-mail only)
Е	1004	Missing or invalid Password	The Password in the Header record is missing or invalid. (e-mail only)
Е	1005	Missing or invalid MPID	Firm MPID in the Header record is missing or is not a valid Market Participant symbol for the Generation Date.
Е	1006	Missing or invalid Header	The value provided in the Record Type Code field of the Header Record was either missing or was a value other than '#HD#'(Header).
Е	1007	Missing or invalid Trailer	The value provided in the Record Type Code field of the Trailer Record is either missing or is a value other than '#TR#'(Trailer).
Е	1008	Missing or invalid Generation Date	Generation Date is missing or is not a valid date.
Е	1009	Missing or invalid FORE Memo	FORE Memo must be in the correct format.

Exception Type Code	Exception Code	Exception Code Description	Explanation
Е	1010	Invalid Delimiter	The delimiter must equal the fifth character of the Header Record. Valid delimiters are ASCII comma (','), semicolon (';'), pipe (' '), and tab ('→').
Е	1011	User ID not registered with an OSO	User ID in the Header record is not registered with an OSO.
Е	1013	User is not recognized by OATS	User ID does not exist in OATS.
Е	1014	Missing or invalid Firm FORE ID	Firm FORE ID is missing or is invalid.
Е	1015	User's Order Sending Organization has expired	The User's OSO has expired.
Е	1016	MPID has expired	MPID in the Header record has expired.
Е	1019	Password has expired	The Password for the user has expired.
Е	1020	User ID locked	The User ID is locked.
Е	1021	User ID disabled	The User ID is disabled.
Е	1022	Invalid Reporting OSO ID	Reporting OSO ID provided is in an invalid format.
Е	1023	Reporting OSO ID invalid or expired	Reporting OSO ID provided is invalid or has expired.
Е	1029	No status sent due to violation of submission requirements	If OATS submission requirements are violated, OATS will not generate FORE status.
Е	1030	FORE file exceeds the supported size limit	FORE file size exceeds the maximum uncompressed size of 25MB.
Е	1033	Unauthorized Transmitting OSO ID	Transmitting OSO ID has not been authorized to submit for the Firm MPID. Verify that the Transmitting OSO ID and Firm MPID in the FORE file header have a transmitting

Exception Type Code	Exception Code	Exception Code Description	Explanation
			relationship.
Е	1034	Missing Reporting/Transmitting OSO ID	Reporting or Transmitting OSO ID is missing from the FORE file header.
Е	1035	Unauthorized Reporting OSO ID	Reporting OSO ID has not been authorized to submit for the Firm MPID. Verify that the Reporting OSO ID and Firm MPID in the FORE file header have a reporting relationship.
Е	1036	Invalid Forefile Format	A file that is missing an end of file or end of line marker, or contains invalid special or hidden characters which prevents OATS from processing the file.
W	1101	Firm provided ROE count does not equal ROEs received	The number of ROEs in the FORE, as calculated by OATS, does not match the Record Count provided in the Trailer Record.

Reportable Order Event Messages

The table below lists the rejection reasons for Reportable Order Events that failed validation checks.

Rejection	Rejection Description	Explanation
Code		
2001	Missing or invalid Order Receiving Firm MPID	Order Receiving Firm MPID must be a valid symbol for the event date.
2002	Missing or invalid ROE Record Type	The first field in an ROE record must be #OE#.
2003	Missing or invalid Order Received Date	A valid Order Received Date must be provided on each order report.
2004	Order Received Date is greater than current system date	The date provided indicates the event had not yet occurred at the time it was reported to OATS.
2006	Missing or invalid Firm Order ID	A valid Firm Order ID must be provided on all order events.

Rejection Code	Rejection Description	Explanation
2007	Missing or invalid Order Event Type	Order Event Type Code must be one of the following values:
		'NW' (New Order Report), 'RT' (Route Report), 'DS' (Desk Report), 'EX' (Execution Report), 'CL' (Cancel Report), 'CR' (Cancel/Replace Report), or 'OE' (Combined Order/Execution Report), 'OR' (Combined Order/Route Report).
2008	Missing or invalid Action Type Code	Action Type Code must be one of the following values:
		'N'(new event, not previously accepted by OATS), 'D'(deletion of an event previously accepted by OATS), 'R'(deletion of an event previously accepted by OATS for purposes of replacement by the subsequent event), and 'C'(correction of an event previously accepted by OATS).
2009	Missing or invalid Order Received Timestamp	A valid Order Received Timestamp must be provided on all New Order, Cancel/Replace, Combined Order/Route, and Combined Order/Execution Report.
2010	Missing or invalid Correction Deletion Timestamp	Correction Deletion Timestamp is required when the Action Type Code is 'R'(delete for replacement), 'C'(corrected), or 'D'(deleted).
2011	Correction Deletion Timestamp is greater than current system date	The Timestamp indicates the event had not yet occurred at the time it was reported to OATS.
2012	Invalid Rejected ROE Resubmit Flag	The value must be either 'Y' or null.
2013	Missing or invalid Rejected ROE ID	Rejected ROE ID must be blank when the Rejected ROE Resubmit Flag is blank.
2018	Delete/Replace Report received without a valid Corrected Report	The Corrected Report that followed the Delete/Replace Report did not match or was invalid.
2019	Corrected Report received without a valid Delete/Replace report	A Corrected Report was received by OATS following an invalid Delete/Replace Report, or the Delete/Replace Report was not received.
2021	Missing or invalid Issue Symbol ID	Issue Symbol ID must be provided and must be in the correct format.

Rejection Code	Rejection Description	Explanation
2022	Invalid Firm ROE ID	Firm ROE ID must be in the correct format.
2023	Combination of Sent to Firm MPID and Destination Code is invalid	For the Route Order and Combined Order/Route Report, the following Sent to Firm MPID and Destination Code combinations are required: • If the Destination Code is 'M' or 'E', the Sent to Firm MPID must be a FINRA member. • If the Destination Code is 'N' or 'A', the Sent to MPID must be populated with a Reportable Non–FINRA Member identifier. • If the Destination Code is 'F' or 'X', the Sent to MPID may be blank; must not be populated with a FINRA member MPID or a Reportable non-member identifier.
2024	Invalid Sent To Firm MPID	Sent to Firm MPID must be a valid Market Participant for the event date and in the correct format.
2025	Delete/Replace Report must be followed immediately by a Corrected Report	Two reports are required in sequence when an order report is corrected: the first identifies the incorrect report and must have an Action Type Code of 'R'(delete for replacement). The second report is the correct report and must have an Action Type of 'C'(correct). The Delete/Replace Report was not followed by a Corrected Report.
2026	Corrected Report must be immediately preceded by a Delete/Replace Report	Two reports are required in sequence when an order report is corrected: the first identifies the incorrect report and must have an Action Type Code of 'R'(delete for replacement). The second report is the correct report and must have an Action Type of 'C'(correct). The Corrected Report was not preceded by a Delete/Replace Report.
2027	Missing Sent To Firm MPID	Sent to Firm MPID is required on the 'RT'(Route) or 'OR'(Combined Order/Route) when the Destination Code is 'M'(FINRA Member) or 'E'(ECN).
2028	Order Received Timestamp is greater than the current date and time	Timestamp indicates the event had not yet occurred at the time it was reported to OATS.
2029	Issue is not reportable to OATS	The issue is a valid symbol but is not reportable to OATS.

Rejection Code	Rejection Description	Explanation
2030	Issue Symbol invalid for Order Event Date	Issue Symbol ID is not effective on the order event date.
2031	ROE line length exceeds maximum length	ROE line length must not exceed maximum length for the ROE type.
2032	Issue Symbol does not match listing market format	For exchange listed securities, the symbol format must match the format published by the primary listing market.
2033	Additional fields specified in ROE but are not defined for this ROE type	Refer to Appendix C, "Order Report Formats," for permitted fields for each order event type.
2034	Firm MPID in the ROE must equal MPID in header	If populated, the Order Receiving Firm MPID in all ROEs within a single FORE must equal the Order Receiving Firm MPID in the FORE header.
2035	Invalid ROE delimiter	The delimiter in the ROE either does not match the delimiter established in the header record, or is not a valid delimiter of ASCII comma (','), semicolon (';'), pipe (' '), or tab ('→').
2036	Cancelled Timestamp is prior to Order Received Timestamp	An order cannot be Cancelled before it is received. Therefore, the Cancelled Timestamp must be equal to or later than the Order Received Timestamp.
2037	Invalid Alphanumeric Character	A field value in the ROE contains a delimiter or a non-allowable ASCII character.
2039	Invalid Information Barrier ID	Information Barrier ID must be in the correct format.
2040	Invalid Connection ID	Connection ID must be in the correct format.
2102	Invalid Routing Firm MPID	Routing Firm Market Participant ID must be effective for the Order Received Timestamp and in the correct format.
2107	Missing or invalid Routed Order ID	Routed Order ID must not contain a delimiter or leading zeroes and must be in the correct format. Must be populated when the Order Origination Code is 'W', Received Method Code is 'E'.
2108	Invalid Sent To Routed Order ID	Sent To Routed Order ID provided must not contain a delimiter or leading zeroes and must be in the correct format.

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Rejection Code	Rejection Description	Explanation
2110	Missing or invalid Buy Sell Code	Buy Sell Code must be one of the following values: 'B'(buy), 'SL'(sell long), 'SS'(short sale) or 'SX'(short sale exempt).
2111	Missing Time In Force Code	If the order contains a Limit Price, a Stop Price, or both, a Time in Force Code must be provided.
2112	Invalid Time In Force Code	If provided, Time in Force must be one of the following values: 'DAY' (day order); 'GTD' (good till date), 'GTT'
		(good till time), 'GTC' (good till cancel), or 'GTM' (good this month).
2113	Missing Expiration Date	Expiration Date must be provided if the Time in Force Code is any of the following: 'GTD' (good till date), 'DAY' (Day Order), or 'GTT' (Good Till Time).
2114	Expiration Date must be blank	The Expiration Date must be blank if the Time in Force Code is any of the following: Blank (Market Order) or 'GTC' (Good Till Cancelled), 'GTM' (Good This Month).
2115	Invalid Expiration Date	Expiration Date provided must be in the correct format.
2116	Expiration Time must be blank	The Expiration Time must be blank if the Time in Force Code is any of the following: Blank (Market Order), 'DAY' (Day Order), 'GTD' (Good Till Date), 'GTM' (Good This Month), or 'GTC' (Good Till Cancelled).

Rejection Code	Rejection Description	Explanation
2117	Expiration Date is not valid for the Time in Force Code	 The following Time in Force Code and Expiration Date combinations are valid: If the Time in Force Code is 'GTT' or 'GTD', Expiration date must be equal to or greater than Order Received Date.
		 If the Time in Force Code is 'DAY', the Expiration Date must be equal to or one trading day greater than the Order Received Date of the order. If the Trading Session Code is 'FOR' and the Time in Force Code is 'DAY', Expiration Date
		must be equal to or greater than the Order Received Date of the order.
2118	Missing or invalid Expiration Time	Expiration Time provided must be in the correct format.
2119	Expiration Time required for Good Till Time orders	Expiration time must be provided for orders with a Time in Force of 'GTT' (good till time).
2120	Missing or invalid Shares Quantity	Shares Quantity is required and must be an integer greater than zero.
2123	Missing or invalid Received Method Code	Received Method Code must be one of the following values: 'E'(Electronic), or 'N'(Manual).
2125	Missing or invalid Account Type Code	Account Type Code must be provided and must be one of the following values:
		'A'(Institutional Customer), 'C'(Combined), 'I'(Individual Customer), 'O'(Market Maker Proprietary), 'P'(Other Proprietary), 'E'(Employee Account), 'U'(Unknown), or 'X'(Error Account).
2127	Missing or Invalid Trading Session Code	Trading Session Code must be populated for New Type orders and must be one of the following values:
		'FOR' (Foreign Market), 'PRE' (Pre-Market Only), 'PREREG' (Pre-Market and Regular), 'REG' (Regular Only), 'REGPOST' (Regular and Post-Market), 'POST' (Post-Market Only), 'PREPOST' (Pre-Market and Post-Market), or 'ALL' (All Sessions).

Rejection Code	Rejection Description	Explanation
2128	Invalid Receiving Department ID	When populated, must be one of the following values:
		'A' (Agency), 'ATS' (Alternative Trading System), 'MA' (Market Access), 'T'(Trading) or 'O'(Other).
2129	Missing or invalid Program Trading Code	Program Trading Code must be one of the following values:
		'Y'(yes), 'N'(no), or 'X'(not known). If the Order Origination Code is 'F', must not equal 'X'.
2130	Invalid Arbitrage Code	If provided, Arbitrage Code must be one of the following values:
		'Y'(yes), 'N'(no), 'X'(not known). If the Order Origination Code is 'F', must not equal 'X'.
2131	Invalid Limit Price	Limit Price provided must be in the correct format.
2133	Invalid Stop Price	Stop Price provided must be in the correct format.
2136	Invalid Do Not Reduce Do Not Increase Code	If provided, Do Not Reduce/Do Not Increase Code must be one of the following values:
		'DNR'(do not reduce), 'DNI'(do not increase), 'DIR'(do not reduce or increase).
2138	Missing or invalid Order Origination Code	Order Origination Code must be one of the following values:
		'F'(Order Originated with Firm) or 'W'(Received from another Broker/Dealer)
2139	Missing or invalid Exchange Participant ID	Required for all Route and Combined Order/Route reports with a Destination Code representing a national securities exchange.
2140	Order Receiving Firm MPID and Exchange Participant ID must be assigned to the same member firm	The Exchange Participant ID must be assigned to the same member firm that is submitting the Combined Order/Route and Route Report representing the transmittal of the order to the exchange.
2144	Missing or invalid Customer Instruction Flag	If the ECN flag is blank and a limit price is provided, the Customer Instruction Flag must be provided.

Rejection Code	Rejection Description	Explanation
2145	Invalid Originating Department ID	When populated, must be one of the following values: 'A' (Agency), 'ATS' (Alternative Trading System), 'T' (Trading) or 'O' (Other).
2146	Both Originating Department ID and Receiving Department ID must not be populated.	For a New Order, Cancel/Replace, Combined Order/Route and Combined Order/Execution Report, either Originating Department ID or Receiving Department ID must be populated, but both cannot be populated.
2147	Invalid Special Handling Code 1	If provided, Special Handling Code 1 must be one of the following values: 'ADD' (Add), 'AOB' (At or Between), 'AON' (All or None), ALO (Add Liquidity Only), 'CND' (Conditional Order), 'CNH' (Cash Not Held), 'CPR' (Counterparty Restriction), 'CSH' (Delivery Instructions: Cash- trade settles on the same trade date.), 'DIR' (Directed Orders), 'DLO' (Discretionary Limit Order), 'E.W' (Exchange for Physical Transaction), 'FBA' NYSE Floor Broker Algorithm, 'F0' (Stay on Offerside), 'F3' (Go Along), 'F6' (Participate Don't Initiate), 'F7' (Strict Scale), 'F8' (Try to Scale), 'F9' (Stay on Bidside), 'FA' (No Cross), 'FB' (OK to Cross), 'Fb' (Strict Limit), 'FC' (Call First), 'Fc' (Ignore Price Validity Checks), 'FD' (Percent of Volume), 'Fd' (Peg to Limit Price), 'Fe' (Work to Target Strategy), 'FH' (Reinstate on System Failure), 'FI' (Institutions Only), 'FJ' (Reinstate on Trading Halt), 'FK' (Cancel on Trading Halt), 'FK' (Cancel on Trading Halt), 'FF' (Market Peg), 'FQ' (Cancel on System Failure), 'FR' (Primary Peg), 'FS' (Suspend), 'FT' (Fixed Peg to Local Best Bid or Offer at time of order), 'FW' (Peg to VWAP), 'FX' (Trade Along), 'FY' (Try to Stop), or 'FZ' (Cancel if Not Best), 'G' (G Order), 'IDX' (Intra-Day Cross), 'IO' (Imbalance Only), 'IOC' (Immediate or Cancel), 'ISO' (Intermarket Sweep Order), 'LOC' (Limit on Close), 'MAO' (Market at Open), 'MOB' (Mid-point or Better), 'MOC' (Market on Close), 'MOO' (Market

Rejection Code	Rejection Description	Explanation
		on Open), 'MPT' (Merger Related Transfer Position), 'MQT' (Minimum Quantity), 'MTL' (Market to Limit), 'ND' (Delivery Instructions: Next Day - trade settles on a next trade date.), 'NH' (Not Held), 'OPO' (Opt Out of Locked Market), 'OPT' (Options Related Transaction), 'OVD' (Over the Day), 'PEG' (PEG), 'RSV' (Reserve Size Order), 'S.W' (Stop Stock Transaction), 'SCL' (Scale), 'SLD' (Slide), 'SLR' (Delivery Instructions: Seller's Option - trade settles on a date determined by a seller.), 'SLQ' (Stop Limit on Quote), 'SOQ' (Stop on Quote), 'STP' (Self Trade Prevention), 'TAI' (Trade-at ISO), 'TMO' (Time Order), 'TS' (Trailing Stop) or 'WRK' (Work). If the ATS Display Indicator is populated, only the following list of Special Handling Codes is permitted: 'ALO', 'AON', 'CND', 'CPR', 'DIR', 'FOK', 'IOC', 'ISO', 'MQT', 'NH', 'OPO', 'RSV', 'SLD', 'STP', 'TAI', 'F6'.
2148	Invalid Special Handling Code 2	See Exception Code 2147
2149	Invalid Special Handling Code 3	See Exception Code 2147
2150	Invalid Special Handling Code 4	See Exception Code 2147
2151	Invalid Special Handling Code 5	See Exception Code 2147
2153	Combination of Routing Firm MPID and Member Type Code is invalid	For the New Order, Cancel/Replace, Combined Order/Route and Combined Order/Execution Report, the following Routing Firm MPID and Member Type Code combinations are required, if the Order Origination Code is 'W': • If the Member Type Code is 'M', 'E' or 'C', the Routing Firm MPID must be a FINRA member. • If the Member Type Code is 'N' or 'A', the Routing Firm MPID must be populated with a Reportable Non-Member identifier. • If the Member Type Code is 'F' or 'X', the Routing Firm MPID may be blank; must not be populated with a FINRA member MPID or a Reportable Non-Member identifier.

Rejection Code	Rejection Description	Explanation
2154	Routing Firm MPID must be blank when the Order Origination Code is 'F'	For the New Order, Cancel/Replace, Combined Order/Route and Combined Order/Execution Report, the Routing Firm MPID must be blank if the Order Origination Code is 'F'.
2155	Combination of Order Origination Code and Receiving Department ID is not valid	For the New Order, Cancel/Replace, Combined Order/Route, and Combined Order/Execution Report, the following Order Origination Code and Receiving Department ID combinations are invalid: • Order Origination Code is 'F' and Receiving Department ID is 'MA'.
2156	Missing or invalid Market Center ID	Required on all Execution and Combined Order/Execution Reports and must be one of the following values: 'A'(NYSE MKT), 'B'(NASDAQ OMX BX), C'(National Stock Exchange), 'DN'(FINRA/NYSE TRF), 'D'(ADF), 'F'(Non-US Exchange), 'I'(International Securities Exchange), 'J' (EDGA Exchange), 'K' (EDGX Exchange), 'L'(FINRA/NASDAQ TRF), 'M'(Chicago Stock Exchange), 'N'(New York Stock Exchange), 'O'(OTC Reporting Facility), 'P'(NYSE Arca Exchange), 'Q'(The NASDAQ Stock Market), 'V'(Investors Exchange), 'W'(CBOE Stock Exchange), 'X'(NASDAQ OMX PHLX), 'Y' (BATS BYX Exchange) or 'Z' (BATS BZX Exchange).
2157	Invalid Originating MPID	If populated, Originating MPID must be provided in the correct format on all Desk, Route, Execution, Cancel/Replace and Cancel orders.
2158	No relationship exists between Originating Broker/Dealer and Order Receiving Firm MPID	A valid relationship must exist between the Originating Broker/Dealer and the Order Receiving Firm MPID.

APPENDIX B —ERROR MESSAGES

Rejection	Rejection Description	Explanation
Code		
2159	Missing or invalid Member Type Code	Required on all New Order, Cancel/Replace, Combined Order/Route, and Combined Order/Execution Reports and must be one of the following values: 'A'(Represents a Reportable Non-Member affiliate if received from another BD, or a customer affiliate if not received from a BD), 'C'(ECN), 'E'(Non- Reporting Member), 'M'(FINRA Member), 'N'(Represents a Reportable Non-Member (not an
		affiliate) if received from another BD, or a customer (not an affiliate) if not received from a BD), 'F' (Foreign Affiliate) or 'X' (Foreign BD, not an Affiliate).

Rejection Code	Rejection Description	Explanation
2161	Missing or invalid Destination Code	Required on all Route Reports and Combined Order/Route Reports and must be one of the following values:
		'A'(Reportable Non-Member; Affiliate), 'E'(ECN), 'M'(FINRA Member), 'N'(Reportable Non-Member, Not an Affiliate), 'F' (Foreign Affiliate) or 'X' (Foreign BD, not an Affiliate).
		The following codes are used to identify Equity Exchanges :
		'XA'(NYSE MKT), 'XB'(NASDAQ OMX BX), 'XC'(National Stock Exchange), 'XF'(Non-US Exchange), 'XI'(International Securities Exchange), 'XJ' (EDGA Exchange), 'XK' (EDGX Exchange), 'XM (Chicago Stock Exchange), 'XN (The New York Stock Exchange), 'XO'(Bourse de Montreal), 'XP'(NYSE Arca), 'XQ'(The NASDAQ Stock Market), 'XT'(Toronto Stock Exchange), 'XV'(Investors Exchange), 'XW'(CBOE Stock Exchange) or 'XX'(NASDAQ OMX PHLX), 'XY'(BATS BYX Exchange), or 'XZ'(BATS BZX Exchange).
		The following codes are used to identify Options Exchanges :
		'OA'(NYSE Amex Options Exchange), 'OB'(Boston Options Exchange, LLC), 'OC'(Chicago Board Options Exchange), 'OE'(BATS EDGX Options Exchange), 'OH' (ISE Gemini), 'OI'(International Securities Exchange), 'OJ'(C2 Options Exchange), 'OM' (MIAX Options Exchange), 'OP'(NYSE Arca Options Exchange), 'OQ'(NASDAQ OMX Options), 'OT' (NASDAQ OMX BX Options), 'OX'(NASDAQ OMX PHLX Options), or 'OZ'(BATS Options Exchange).

Rejection Code	Rejection Description	Explanation
2162	Missing or Invalid ATS Display Indicator	Required on all New Order, Cancel/Replace, Combined Order/Route, and Combined Order/Execution Reports when either of the following conditions are true: Order Receiving Firm MPID is an ECN Order Receiving Firm MPID is an ATS and the Issue Symbol ID is a NMS stock. Allowable values include: 'S' – ATS displays orders outside of ATS to Subscribers only 'Y' – ATS displays orders outside of ATS via public quotation 'N' – ATS does not display orders outside of ATS
2163	Combination of Member Type Code and Account Type Code is not valid	For the New Order, Cancel/Replace, Combined Order/Route, and Combined Order/Execution Reports, when the Order Origination Code is 'F', the following Member Type Code and Account Type Code combinations are valid: • Member Type Code is 'A' or 'N', and the Account Type Code is 'A', 'C', 'I' or 'E' • Member Type Code is 'M' or 'N', and the Account Type Code is 'O', 'P', or 'X'
2164	Missing , Invalid, or Invalid use of TMO Trigger Timestamp	TMO Trigger Timestamp must be provided in the correct format and must be supplied if one of the Special Handling Codes is 'TMO'.
2165	Invalid Negotiated Trade Flag	If provided, Negotiated Trade Flag must be 'Y'
2166	Combination of Order Origination Code and Member Type Code is not valid	For the New Order, Cancel/Replace, Combined Order/Route, and Combined Order/Execution Reports, the following Order Origination Code and Member Type Code combinations are invalid: Order Origination Code is 'F' and Member Type Code is 'C', or 'E'

Rejection Code	Rejection Description	Explanation
2167	Combination of Order Origination Code and Account Type Code is not valid	For the New Order, Cancel/Replace, Combined Order/Route, and Combined Order/Execution Reports, the following Order Origination Code and Account Type Code combination is not valid:
		Order Origination Code is 'F' and Account Type Code is 'U'
2168	Receiving Department ID or Originating Department ID must be populated.	If the Order Origination Code is 'F' and the Account Type Code is 'C', the Receiving Department ID or Originating Department ID must be populated.
2169	Missing Receiving Department ID	Must be provided if the Order Origination Code is 'W' or if the Order Origination Code is 'F' and the Account Type Code is 'A', 'E', or 'I'.
2170	Missing Originating Department ID	If the Order Origination Code is 'W', the Originating Department ID must be blank. Must be provided if the Order Origination Code is 'F' and the Account Type Code is 'O', 'P' or 'X'.
2171	Combination of Reporting Exception Code and Capacity Code is not valid	For Execution and Combined Order/Execution reports, the following Reporting Exception Code and Capacity Code combinations are required:
		• If the Reporting Exception Code is 'R', the capacity code must be 'R'
		• If the Reporting Exception Code is 'A' or 'T', the capacity code must be 'A'
		• If the Reporting Exception Code is 'P', the capacity code must be 'P'
2172	Missing or invalid Routed Order Type Indicator	Routed Order Type Indicator must be one of the following values: 'L'(Order Routed as a Limit Order) or 'M'(Order Routed as a Market Order).
2173	Missing or invalid Route Price	Route Price must be provided if the Routed Order Type Indicator is set to 'L' and must be in the correct format.
2174	Route Price must be blank when Routed Order Type Indicator is 'M'	If the Routed Order Type Indicator is set to 'M', Route Price must be blank.

Rejection Code	Rejection Description	Explanation
2201	Missing or invalid OATS Trade ID	Must be provided when a trade is reported to a FINRA transaction reporting system and must not contain a delimiter, spaces, blanks, or leading zeroes.
2202	Missing or invalid Execution Type Flag	Execution Type Flag must be one of the following values: 'F'(full execution), or 'P'(partial execution).
2203	Missing or invalid Execution Timestamp	Execution Timestamp must be provided in the correct format on the Execution or Combined Order/Execution Report.
2204	Execution Timestamp is greater than the current date and time	The Timestamp indicates the event had not yet occurred at the time it was reported to OATS.
2205	Invalid Execution Quantity	Execution Quantity must be greater than zero.
2206	Missing or invalid Trader Terminal ID	Trader Terminal ID must be populated and must be in the correct format.
2207	Invalid Reporting Exception Code	Must be provided if the execution is not required to be reported to a FINRA transaction reporting system. If provided, the Reporting Exception Code must be one of the following values:
		'P'(Intra-firm order filled from firm's proprietary account), 'M'(Execution where a FINRA transaction reporting system constraint prevented the entry of a unique identifier (e.g., Branch Sequence Number, Compliance ID), 'R'(Riskless principal transaction), 'A'(Agency Average Price Transaction), 'T'(Agency Post Trade Allocation), or 'F'(Reported on Form T pursuant to FINRA Trade Reporting Rules).
2208	Invalid ISO Indicator	If populated, ISO Indicator must be 'Y' or 'T'.
2209	Invalid Short Sale Exempt Indicator	If populated, Short Sale Exempt Indicator must be 'Y'
2211	Missing or invalid Leaves Quantity	A valid Leaves Quantity must be provided if the Execution Type is 'P'(partial). A value of zero or greater is acceptable.

Rejection Code	Rejection Description	Explanation
2212	A valid Cancel Leaves Quantity is required for partial cancellations	The number of shares remaining in the order must be supplied when the order is partially Cancelled (Cancel Type Flag is 'P'). A value of zero or greater is acceptable.
2213	Invalid Cancel Leaves Quantity	If the Cancel Leaves Quantity is populated, it must be 0 or a positive integer.
2215	Missing or invalid Execution Price	Execution price provided must be in the correct format.
2216	Missing or invalid Capacity Code	Capacity Code must be one of the following values: 'A'(Agent), 'P'(Principal), or 'R'(Riskless Principal).
2301	Missing or invalid Cancelled Timestamp	Cancelled Timestamp must be provided on a Cancel Report.
2302	Missing or invalid Cancel Type Flag	Cancel Type Flag must be one of the following values: 'F'(full) or 'P'(partial).
2303	Missing or invalid Cancel Quantity	Cancel Quantity must be greater than zero when the Cancel Type Flag is 'P'(partial cancellation).
2304	Missing or invalid Cancelled By Flag	The Cancelled By Flag must be one of the following values: 'C'(Customer Cancelled), or 'F'(Firm Cancelled).
2305	Missing or invalid Modified by Flag	The Modified By Flag must be one of the following values:
		'C'(Customer Modified), or 'F'(Firm Modified).
2308	Cancelled Timestamp greater than current date and time	The Timestamp indicates the event had not yet occurred at the time it was reported to OATS.
2401	Missing or invalid Order Sent Timestamp	A valid Order Sent Timestamp must be provided on a Route Report.
2402	Order Sent Timestamp is greater than the current date and time	The Timestamp indicates the event had not yet occurred at the time it was reported to OATS.
2403	Invalid Routed Shares Quantity	Routed Shares Quantity must be in a valid format and an integer greater than zero.

Rejection Code	Rejection Description	Explanation
2406	Missing or invalid Routing Method Code	Routing Method Code must be one of the following values:
		'E' (Electronic), 'N' (Non-Electronic), 'S' (Smart Router), or 'F' (NYSE Floor Broker Algorithm).
2407	Invalid Special Routing Condition	If provided, Special Routing Condition must be 'X' (Exchange Order Modification) or 'Y' (Bunched Order). Special Routing Condition of 'X' is permitted only when routing to a national securities exchange.
2411	Routed Order ID is required for electronically routed orders	Routed Order ID must be provided if the Routing Method Code is 'E' (Electronic), 'F' (NYSE Floor Broker Algorithm) or 'S' (Smart Router).
2412	Sent To Firm and Order Receiving Firm must not be identical	A firm may not route an order to itself.
2413	Order Sent Timestamp is prior to Order Received Timestamp	An order cannot be routed before it is received. Therefore, the Order Sent Timestamp must be equal to or later than the Order Received Timestamp.
2414	Cancelled Timestamp is prior to Order Sent Timestamp	An order cannot be routed after it has been fully Cancelled. Therefore, the Cancelled Timestamp must be equal to or later than the Order Sent Timestamp.
2501	Missing or invalid Desk Received Timestamp	Desk Received Timestamp must be provided on the Desk Report and must be in a valid format.
2506	Desk Received Timestamp greater than current date and time	The Timestamp indicates the event had not yet occurred at the time it was reported to OATS.
2507	Missing or invalid Desk Shares Quantity	Desk Shares Quantity must be in a valid format and an integer greater than zero.
2508	Missing or invalid Desk Type Code	Must be one of the following values: 'A'(Agency), 'AR'(Arbitrage), 'B'(Block Trading), 'C'(Convertible Desk), 'CR'(Central Risk Books), 'D'(Derivatives), 'EC'(Equity Capital Markets), 'IN'(International), 'IS'(Institutional), 'O'(Other), 'PF'(Preferred Trading), 'PR'(Proprietary), 'PT'(Program Trading), 'S'(Sales), 'SW'(Swaps), 'T'(Trading) or 'TR'(Treasury).

Rejection Code	Rejection Description	Explanation
2509	Invalid Desk Special Handling Code 1	See Exception Code 2147
2510	Invalid Desk Special Handling Code 2	See Exception Code 2147
2511	Invalid Desk Special Handling Code 3	See Exception Code 2147
2513	Invalid Desk Special Handling Code 4	See Exception Code 2147
2514	Invalid Desk Special Handling Code 5	See Exception Code 2147
2515	Desk Received Timestamp is prior to Order Received Timestamp.	An order cannot be transmitted to an internal desk before it is received at the firm. Therefore, the Desk Received Timestamp must be equal to or later than the Order Received Timestamp.
2603	Missing or invalid Replaced Order Received Date	Replaced Order Received Date is required on the Cancel/Replace Report and must be in the correct format. This is the date the order being replaced was received.
2604	Replaced Order Received Date greater than current date	The date provided indicates the event had not yet occurred at the time it was reported to OATS.
2606	Missing or invalid Replaced Firm Order ID	Replaced Firm Order ID is required on the Cancel/Replace Report and must be in the correct format. Must be equal to the Firm Order ID of the order being replaced.
2607	Order Received Date must be equal to the Date Portion of the Order Received Timestamp	The date portion of the Order Received Date must equal the date portion of the Order Received Timestamp
2617	Replaced Order ID must not be identical to the Firm Order ID	The replacement order must have an order identifier that is unique within the Order Received Date.
2703	Routing Firm and Order Receiving Firm must not be identical	A firm may not route an order to itself.
2750	Sent To Routed Order ID is required for electronically routed orders	Sent To Routed Order ID must be provided if the Routing Method Code is 'E' (Electronic), 'F' (NYSE Floor Broker Algorithm) or 'S' (Smart Router).
2752	Missing Routing Firm MPID	Routing Firm MPID must be populated when the Order Origination Code is 'W' and Member Type Code is 'M', 'E', 'C', 'N' or 'A'.

Rejection Code	Rejection Description	Explanation
2753	Invalid ROE Memo	If populated, ROE Memo must be in the correct format.
2801	Missing or Invalid Participation Flag	 Required when either of the following conditions are true: Order Receiving Firm MPID is a Tick Pilot Participant. Firm is an ATS, is an ADF Trading Center and the Issue Symbol ID is a NMS stock. If populated, Participation Flag must be 'T' (Firm is a Tick Size Pilot Trading Center in the security; firm is not an ADF Trading Center), 'Y' (Firm is an ADF Trading Center), or 'A' (Firm is a Tick Size Pilot Trading Center in the security and an ADF Trading Center).
2802	Missing or Invalid Display Size	Display Size must be in the correct format and must be populated when either of the following conditions are true: • Participation Flag is 'A' • ATS Display Indicator is 'S' or 'Y' and the Issue Symbol ID is a NMS stock.
2803	Missing or Invalid Routable Flag	Routable Flag must be 'Y' (Order is routable) or 'N' (Order is not routable). Required when either of the following conditions are true: Participation Flag is populated ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
2804	Missing or Invalid Retail Investor Order Flag	Retail Investor Order Flag is required when the Participation Flag is 'T' or 'A'. If populated, Retail Investor Order Flag must be 'Y' (Trading center is relying upon the Retail Investor Order exception with respect to the order) or 'N' (Trading center is not relying upon the Retail Investor Order exception with respect to the order).

Rejection Code	Rejection Description	Explanation
2805	Missing or Invalid Display Price	Display Price must be in the correct format and must be populated when the ATS Display Indicator is 'S' or 'Y', the Issue Symbol ID is a NMS stock and the Display Size > 0.
2806	Missing or Invalid NBBO Bid Price	NBBO Bid Price must be in the correct format and must be populated when the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
2807	Missing or Invalid NBBO Ask Price	NBBO Ask Price must be in the correct format and must be populated when the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
2808	Missing or Invalid NBBO Source	NBBO Source must be 'D' (Direct Feed), 'H' (Hybrid), or 'S' (SIP). Required when ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
2809	Missing or Invalid NBBO Matching Engine Lookup Date	NBBO Matching Engine Lookup Date must be in the correct format and must be populated when the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
2810	Missing or Invalid NBBO Matching Engine Lookup Time	NBBO Matching Engine Lookup Time must be in the correct format and must be populated when the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
2811	Missing or Invalid ATS Order Type	If populated, ATS Order Type provided must be equal to a unique identifier representing the specific order type provided to FINRA by the ATS.
2812	Invalid Processing Sequence Number	If populated, Processing Sequence Number must be in the correct format.
2813	Missing or Invalid ADF Quote ID	ADF Quote ID provided must be in the correct format and must be populated if the ATS Display Indicator is populated and the Participation Flag is 'A' or 'Y'.
2814	Missing or Invalid NBBO Bid Price at Execution	NBBO Bid Price at Execution must be in the correct format and must be populated when the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.

Rejection Code	Rejection Description	Explanation
2815	Missing or Invalid NBBO Ask Price at Execution	NBBO Ask Price at Execution must be in the correct format and must be populated when the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
2816	Missing or Invalid NBBO Source at Execution	NBBO Source must be 'D' (Direct Feed), 'H' (Hybrid), or 'S' (SIP). Required when ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
2817	Missing or Invalid NBBO Matching Engine Lookup Date at Execution	NBBO Matching Engine Lookup Date must be in the correct format and must be populated when the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
2818	Missing or Invalid NBBO Matching Engine Lookup Time at Execution	NBBO Matching Engine Lookup Time must be in the correct format and must be populated when the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
2819	Missing or Invalid Order Display Modification Timestamp	Order Display Modification Timestamp must be provided in the correct format on Order Display Modification.
3004	Route Report is for an order that does not exist in OATS	The Route Report references an order that does not exist in OATS, either because it was not reported or was rejected. The order must be reported on a valid New Order or Cancel/Replace Report before the Route Report will be accepted.
3008	Desk Report is for an order that does not exist in OATS	The Desk Report references an order that does not exist in OATS, either because it was not reported or was rejected. The order must be reported on a valid New Order, Combined Order/Route, Cancel/Replace, or Combined Order/Execution Report before the Desk Report will be accepted.
3014	Execution Report is for an order that does not exist in OATS	The Execution Report references an order that does not exist in OATS, either because it was not reported or was rejected. The order must be reported on a valid New Order or Cancel/Replace Report before the Execution Report will be accepted.

Rejection Code	Rejection Description	Explanation
3020	Cancel Report is for an order that does not exist in OATS	The Cancel Report references an order that does not exist in OATS, either because it was not reported or was rejected. The order must be reported on a valid New Order, Combined Order/Route, or Cancel/Replace Report before the Cancel Report will be accepted.
3023	Cancel/Replace Report is for an order that does not exist in OATS	The Cancel/Replace Report references an order that does not exist in OATS, either because it was not reported or was rejected. The order must be reported on a valid New Order, Combined Order/Route or Cancel/Replace Report before the Cancel/Replace Report will be accepted.
3026	Deleted Report is for an event that does not exist in OATS	Deleted Report references an event that was not reported to OATS or was rejected.
3030	Delete/Replace Report is for an event that does not exist in OATS	Delete/Replace Report references an event that was not reported to OATS or was rejected.
3031	Corrected Report is for a Delete/Replace Report that does not exist in OATS	Corrected Report references a Delete/Replace Report that was not reported to OATS or was rejected.
3032	Issue Symbol is unrelated to Symbol reported on Originating Order	Issue Symbol on the Desk, Cancel, Route, Cancel/Replace, or Execution Report is not related to the Issue Symbol reported on the corresponding New, Combined Order/Route, Cancel/Replace, or Combined Order/Execution. Example: If the New Order Report is submitted with Issue Symbol "MSFT" and the Execution Report is submitted with Issue Symbol "YHOO", the Execution Report will be rejected. If the New Order Report is submitted with Issue Symbol "ANLY" and the Execution Report is submitted with the related Issue Symbol "ANLYD", the Execution Report will be accepted.
3501	Duplicate Order Event	The order event has already been received by OATS. The first instance of an event will be retained; all subsequent submissions will be rejected.

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Rejection Code	Rejection Description	Explanation
3502	Duplicate Order identifiers reported on same day	More than one order was reported for the same OATS Order ID (Order Receiving Firm, Order Received Date, and Order Receiving Firm Order ID) on the current OATS Reporting Day. All events associated with the duplicate OATS Order ID will be rejected.
3503	Duplicate Order identifiers reported on previous day	One or more orders were reported that have the same OATS Order ID (Order Receiving Firm, Order Received Date, and Order Receiving Firm Order ID) as an order reported on a previous day. All events received on the current OATS Reporting Day having the duplicate OATS Order ID and events associated with the duplicate OATS Order ID will be rejected. The events received on a previous day having the duplicate OATS Order ID will not be rejected.
3512	Duplicate Routed Order ID or Sent to Routed Order ID reported on same day	For Route and Combined Order/Route reports, if the Destination Code is 'M', 'E', 'N' or 'A', the Routed Order ID or Sent to Routed Order ID must be unique for the MPID, the Order Sent Date, Connection ID, and Sent to MPID. For Route and Combined Order/Route reports, if the Destination Code represents a national securities exchange, the Routed Order ID or Sent to Routed Order ID must be unique for the MPID, the Order Sent Date, Connection ID, Destination Code, and Exchange Participant ID. All Route and Combined Order/Route Reports containing the duplicated Routed Order ID or Sent to Routed Order ID and the associated events will be rejected.

Rejection	Rejection Description	Explanation
Code		
3513	Duplicate Routed Order ID or Sent to Routed Order ID reported on previous day	One or more Route and Combined Order/Route reports were reported that have the same Routed Order ID or Sent to Routed Order ID as a Route or Combined Order/Route reported on a previous day. All Route and Combined Order/Route Reports received on the current OATS Reporting Day containing the duplicated Routed Order ID or Sent to Routed Order ID will be rejected. The events received on a previous day having the duplicated Routed Order ID or Sent to Routed Order ID or Sent to Routed Order ID and the associated events will not be rejected.

Out of Sequence Events

The table below lists of the Out of Sequent reason codes for subsequent events reported with an event timestamp prior to the Order Received timestamp reported on the originating event.

Out of Sequence Reason Code	Code Description	Explanation
3003	Order Sent Timestamp is prior to Order Received Timestamp	Order Sent Timestamp reported on the Route Report is prior to the Order Received Timestamp reported on the originating event.
3007	Desk Received Timestamp is prior to Order Received Timestamp	Desk Received Timestamp reported on the Desk Report is prior to the Order Received Timestamp reported on the originating event.
3013	Execution Timestamp is prior to Order Received Timestamp	Execution Timestamp reported on the Execution Report is prior to the Order Received Timestamp reported on the originating event.
3019	Cancel Timestamp is prior to Order Received Timestamp	Order Cancel Timestamp reported on the Cancel Report is prior to the Order Received Timestamp reported on the originating event.
3039	Order Received Timestamp of Cancel/Replace event is prior to Order Received Timestamp of original event	Order received timestamp reported on the Cancel/Replace Report is prior to the Order Received Timestamp reported on the originating event.

Unmatched Records

The table below lists the unmatched reasons for Reportable Order Events that did not link to a corresponding event.

Unmatched Reason Code	Code Description	Explanation
4001	Late reported Execution or Combined Order/Execution	Execution or Combined Order/Execution was reported more than one day late; therefore, no Order/Trade match was possible.
4002	Matching OATS Trade ID cannot be found	OATS Trade ID reported on OATS Execution or Combined Order/Execution report did not match the unique identifier (e.g., Branch Sequence Number, Compliance ID) provided on the trade report.
4003	Execution Timestamp reported on the Execution event is not equal to the Trade Report	Execution timestamp reported on OATS Execution or Combined Order/Execution did not match the Execution Time on the trade report.
4004	Unmatched due to secondary execution match data error	A trade report with a matching unique identifier (i.e. Branch Sequence Number) was found; however, the issue symbol, MPID, or a combination of fields reported on the OATS Execution or Combined Order/Execution did not match.
4011	Late reported Route or Combined/Order Route	Route or Combined Order/Route was reported more than one day late; therefore, no Exchange Route match was possible.
4012	Matching Routed Order ID/Sent to Routed Order ID cannot be found	Routed Order ID/Sent to Routed Order ID reported on OATS Route or Combined Order/Route does not match to a corresponding exchange order.
4013	Exchange Participant ID did not match	A matching Routed Order ID was identified in the exchange order data for the trade date; however, the Exchange Participant ID did not match.
4014	Issue Symbol did not match	A matching Routed Order ID was identified in the exchange order data for the trade date; however, the Issue Symbol did not match.
4015	Multiple fields did not match	A matching Routed Order ID was identified in the exchange order data for the trade date; however, the issue symbol, Exchange Participant ID, or a combination of fields reported on the OATS Route or Combined Order/Route did not match.

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Unmatched Reason Code	Code Description	Explanation
4016	Connection ID did not match	A matching Routed Order ID/Sent to Routed Order ID was identified in the exchange order data for the trade date; however, the Connection ID did not match.
4021	Late reported Route or Combined/Order Route	Route or Combined Order/Route was reported more than one day late; therefore, no Interfirm match was possible.
4022	Matching Routed Order ID/Sent to Routed Order ID cannot be found	Routed Order ID/Sent to Routed Order ID reported on Routing Firm's Route or Combined Order/Route did not match to the Receiving Firm's Routed Order ID order report.
4023	Routing Firm or Order Receiving Firm Market Participant ID did not match	A matching Routed Order ID was identified in the Receiving Firm order data for the Order Sent Date; however, the Routing Firm MPID or the Order Receiving Firm MPID did not match.
4024	Issue Symbol did not match	A matching Routed Order ID was identified in the Receiving Firm order data for the Order Sent Date; however, the Issue Symbol did not match.
4025	Multiple fields did not match	A matching Routed Order ID was identified in the Receiving Firm order data for the Order Sent Date; however, the issue symbol, Exchange Participant ID, or a combination of fields did not match.

APPENDIX C — ORDER REPORT FORMATS

This appendix describes the detailed specification for the layout of delimited Firm Order Report files (FOREs). OATS will accept only files delivered in this format.

Delimited Format

The delimited format is a field separated format where fields within each record are separated by a delimiter, which marks the end of the current field and the beginning of the next field. Each field is identified by its relative position within each record. The sequence of the fields within each record must be exactly as stated in the record descriptions.

The following rules apply to the delimited formats:

- 1. The sequence of the fields within each record is fixed. Each record must be in the sequence described in this appendix.
- 2. Each field must be terminated by a delimiter even if the field is the maximum length.
- 3. None of the fields in the record can contain the character used for the delimiter.
- 4. The last field in a record is not required to be terminated by a delimiter, but the field will still be considered to be acceptable if the delimiter is included.
- 5. The delimiter is determined by examination of the fifth character of the header record. Each record must end with an end of record marker (ASCII LF or CR/LF) as shown in the format descriptions in this appendix.
- 6. Each field is positional, that is, the order of the fields within each record is a fixed sequence. The position of each field is relative to the beginning of its associated record. Record type is always the first field.
- 7. Fields must be equal to or less than the full length specified.
- 8. Conditional fields (C) are omitted by only including the delimiter.
- 9. Mandatory (M) fields must contain an appropriate value and be terminated by the delimiter.
- 10. Values that do not fill the fields may be padded with blanks or zeroes, as appropriate, but padding is NOT required.
- 11. Numeric fields may be padded with leading zeros; however OATS will remove them during processing.
- 12. Alphanumeric fields may be optionally padded with trailing blanks.
- 13. Date fields are always eight (8) digits and are specified as date (8) formatted as 'YYYYMMDD'.
- 14. Timestamp fields are always seventeen (17) digits and are specified as numeric (17) formatted as 'YYYYMMDDHHMMSSCCC'.
- 15. Fields labeled as Numeric (n,m) must contain no more than n characters, including the decimal; must contain no more than m characters to the right of the decimal; and must

contain no more than n-m characters to the left of the decimal, whether a decimal is implied or not. The decimal is optional only in a case where the price is a whole number. These fields are used for price fields.

Packaging

A Firm Order Report (FORE) must be assembled in a prescribed sequence, which is <header><one or more order event records><trailer>. Multiple FOREs may be packaged in a file. The header record is required to be the first record, and the trailer record is required to be the last record. The rest of the records may be included in any order (corrections require an ordered sequence as described in Section 6.5). All order events must apply to the Order Receiving Firm MPID and the Reporting OSO identified in the header. A Transmitting OSO must send a separate FORE (header/trailer pair) for each combination of Reporting OSO and Order Receiving Firm MPID. If a firm uses multiple MPIDs, a separate FORE must be submitted for each MPID.

Figure C-1 shows the relationship between the file, records, and fields for the delimited format. In all cases, records consist of an ordered series of fields, and a file consists of a header record, one or more order event records, and a trailer record. Each of the Order Event Types that is detailed in this appendix is of differing lengths, but each is terminated by an ASCII line feed (LF), or a combination of carriage return and line feed (CR/LF).

FORE

Header

One or more
Reportable
Order Events
(ROEs)

Figure C-1. Packaging of Delimited Records

The following rules apply to the formatting of the files:

- 1. Each FORE must contain a header record as the first record.
- 2. Each FORE must contain a trailer as the last record.
- 3. Each file is limited to a maximum uncompressed size of 25MB.
- 4. OATS will examine each header to determine if the User ID supplied is associated with a valid Transmitting Order Sending Organization (OSO).
- 5. OATS will examine each header to determine if the Order Receiving Firm MPID is valid.
- 6. OATS will examine each header to determine if the Reporting/Transmitting OSO ID, if supplied, is valid.
- 7. OATS will examine each OSO ID and Order Receiving Firm MPID for FORE file reporting/transmitting privileges.
- 8. Failure to pass validation on any mandatory header or trailer values will result in rejection of the entire FORE.

- 9. All order events contained in a FORE (header/trailer pair) must apply to the combination of Order Receiving Firm MPID and Reporting OSO identified in the header.
- 10. Order events within the FORE may be in any sequence, except for the events addressed in Section 6.5.
- 11. Firms may send order events in more than one file if the file size limit is reached. However, an individual ROE record may not be split or submitted in multiple FORE files.
- 12. Each file may contain multiple FOREs; when it does, the record immediately following a trailer record must be a header record, which must have a corresponding trailer record. There is no limit to the number of FOREs in a file.
- 13. Each FORE (i.e. each header when files contain multiple FOREs) must contain a Firm FORE ID to identify it. The Firm FORE ID is an alphanumeric field of up to 20 characters. The Firm FORE ID must be unique to the OSO for the supplied Generation Date. OATS will validate this field against a list of recently sent files to detect duplicate submissions. Duplicate file submissions will be rejected.
- 14. FORE filenames may not have filename extensions of .status or .rejects, and may not include colons or spaces.

Rules for Content Preparation Table C-1 shows a definition and a description of the data types used in OATS Order Report formats. The definition of the layouts of the various Order Event Type types describes each attribute in terms of the data type.

Table C-1. Data Types

Data Type	Description
Delimiter	A single ASCII character used to separate fields. Permissible delimiters are
	ASCII comma (","), semicolon (";"), pipe (" "), tab ("→").
Alphanumeric (n)	ASCII characters between 32 and 127, except for a delimiter character are
	acceptable. The length n refers to the maximum length, if the field is shorter
	than the maximum length, the value sent should be left-justified and
	terminated with a delimiter. An alphanumeric (8) field representing FINRA
	would be encoded as: "FINRA,".1
Date (8)	Data content must be a date field, and must include the full four digits of the
	year, two digits of the month, and two digits of the day. January 1, 2000 will
	be "20000101". Valid values: YYYY = 0000 - 9999, MM = 01 - 12, DD = 01
	- 31.
Numeric (n)	This field must contain all numeric characters (0-9) only and must be less than
	or equal to n characters. If the field is shorter than the maximum length, the
	field should be left-justified and terminated with a delimiter. The format for
	Numeric (8) of the quantity five hundred and twelve would be encoded: "512,"
Numeric (n,m)	This field must contain all numeric characters (0-9) and a decimal point (".").
	The decimal is optional only in a case where the price is a whole number. The
	field must contain no more than n characters, including the decimal; must
	contain no more than m characters to the right of the decimal; and must
	contain no more than n-m (n minus m) characters to the left of the decimal,
	whether a decimal exists or not. If the field is shorter than the maximum
	length, the field should be left-justified and terminated with a delimiter.
	Example The former for Numeric (18.8) of the quentity three handred twenty two and
	The format for Numeric (18,8) of the quantity three hundred twenty-two and
	one eighth would be encoded: "322.125,". Fractions are not allowed. The largest possible number for (18,8) is 9,999,999,999,999.9999999. There may
	be no more than 8 digits to the right of the decimal; however, if there are 10
	digits to the left of the decimal, there may be no more than 7 digits to the right
	of the decimal.
	of the decimal.

> ¹The Routed Order ID and/or the Sent to Routed Order ID must not contain a delimiter or leading zeroes.

Summary of Record Types

The following table summarizes the record types that OATS uses. The detailed definitions and descriptions for each of these record types follow.

Description	Record Type	Order Event Type	Number	
PODE II		Code		
FORE Header	#HD#	N/A	6	
FORE Trailer	#TR#	N/A	6	
New Order Report	#OE#	NW	7	
Route Report	#OE#	RT	13	
Desk Report	#OE#	DS	15	
Execution Report	#OE#	EX	17	
Cancel Report	#OE#	CL	20	
Cancel/Replace Report	#OE#	CR	21	
Combined Order/Route Report	#OE#	OR	26	
Combined Order/Execution Report	#OE#	OE	33	
Order Display Modification Report	#OE#	OM	40	
Status Header	#ST#	N/A	41	
Status Exception	#SE#	N/A	42	
Status Trailer	#SR#	N/A	42	
Rejected ROE Header	#RH#	N/A	43	
Rejected ROE Description	#RD#	N/A	44	
Rejected ROE Trailer	#RT#	N/A	44	
Unmatched Execution Report Header	#UH#	N/A	45	
Unmatched Exchange Route Report Header	#EH#	N/A	47	
Unmatched Interfirm Route Report – Orders	#OH#	N/A	49	
Routed Header				
Unmatched Interfirm Route Report – Orders	#IH#	N/A	51	
Routed Header				
Unmatched Interfirm Route Report – Orders	#ID#	N/A	51	
Routed Description				
Unmatched Interfirm Route Report – Orders	#IT#	N/A	52	
Routed Trailer				
Unlinked Trade Reports Header	#IH#	N/A	53	
Unlinked Trade Reports Description	#ID#	N/A	54	
Unlinked Trade Reports Trailer	#IT#	N/A	54	
Unlinked Exchange Reports Header	#IH#	N/A	55	
Unlinked Exchange Reports Description	#ID#	N/A	56	
Unlinked Exchange Reports Trailer	#IT#	N/A	57	
Unlinked New Reports Header	#IH#	N/A	58	
Unlinked New Reports Description	#ID#	N/A	59	
Unlinked New Reports Trailer	#IT#	N/A	59	
Out of Sequence Events Header	#QS#	N/A	60	
Out of Sequence Events Description	#QD#	N/A	60	
Out of Sequence Events Trailer	#QT#	N/A	61	

Detailed Record Descriptions

The tables that follow provide detailed descriptions of records in delimited format. The first column in each of the descriptions that appears below indicates the sequence number of each field. The sequence of each field is significant. Mandatory fields are required to contain order data every time they are submitted to OATS. When a field is marked 'C' (Conditional), the conditions under which data must be provided are described in the Permissible Values and Instructions column. Under certain conditions, they become mandatory. Even if no data is required, the delimiter must appear. A more complete definition of the items in the tables can be found in Appendix A—Data Dictionary.

FORE Header Record

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#HD#'—identifies a header record. Delimiter character
	Code			must follow these four characters.
2	FORE Memo	Alphanumeric (16)	C	FORE Memo provided by the firm.
3	Generation Date	Date (8)	M	Date of file generation. Format: YYYYMMDD
4	Firm FORE ID	Alphanumeric (20)	M	Unique for an OSO for a Generation Date, for each FORE submission. OSO must avoid the use of "OATS_" as the
				first five characters.
5	Reporting/Trans mitting OSO ID	Alphanumeric (8)	M	The OSO ID assigned to the organization that is authorized to report/transmit on a firm's behalf.
6	User ID	Alphanumeric (20)	С	The User ID assigned to identify the user transmitting the file to OATS. Optional when FORE is sent via FTP, SFTP or IFT.
7	Password	Alphanumeric (20)	С	Password for this User ID. Optional when FORE is sent via FTP, SFTP or IFT.
8	Order Receiving Firm MPID	Alphanumeric (4)	M	The Order Receiving Firm MPID identifying the MPID for which the ROEs in the FORE are reported. Must be valid
		(1 0)	1.5	for the Generation Date.
9	End of Record	(1 or 2)	M	Values: LF (Line Feed), or CR/LF (Carriage Return/Line
	Marker			Feed)

FORE Trailer Record

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#TR#' —identifies a trailer record.
2	Record Count	Numeric (8)		Total number of order entry records in the file. NOTE: This does not include the header and the trailer.
3	End of Record Marker	(1 or 2)	M	Values: LF (Line Feed), or CR/LF (Carriage Return/Line Feed)

New Order Report

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#OE#'—identifies an order event record.
				Case sensitive.
2	Order Event	Alphanumeric (2)	M	'NW'—identifies the order event record type as a new
	Type Code			order. Case sensitive.
3	Action Type Code	Alphanumeric (1)	M	Values: 'N', 'C', 'D', or 'R'. Case sensitive.
4	Firm ROE ID	Alphanumeric (12)	С	Values: Any alphanumeric not containing a delimiter.
5	Correction/ Deletion	Numeric (17)	С	Format: YYYYMMDDHHMMSSCCC
	Timestamp			Required if the Action Type Code is 'C', 'D', or 'R'.
6	Rejected ROE Resubmit Flag	Alphanumeric (1)	С	Value: 'Y'. Case sensitive.
				Required when the ROE has been rejected by OATS and has been corrected for resubmission.
7	Order Receiving Firm MPID	Alphanumeric (4)	С	Case sensitive.
				If populated, must be equal to the Order Receiving Firm MPID in the Header of the FORE.
8	Order Receiving Firm Order	Numeric (17)	M	Format: YYYYMMDDHHMMSSCCC
	Received Date			Date portion must equal the date portion of the Order Received Timestamp (for orders received on or after
				October 17, 2011).
9	Order Receiving Firm Order ID	Alphanumeric (40)	M	Values: Any alphanumeric not containing a delimiter.
				Must be unique for the firm within the Order Received Date.
10	Routing Firm MPID	Alphanumeric (9)	С	Case sensitive.
				Must be a FINRA member MPID for the Order Received Timestamp if the Order Origination Code is 'W' and the
				Member Type Code is 'C', 'E' or 'M'. If the Order
				Origination Code is 'W' and the Member Type Code is 'N' or 'A', must be populated with Reportable Non-Member
				identifier. If the Order Origination Code is 'W' and the Member Type Code is 'F' or 'X', may be blank; must not be
				populated with a FINRA member MPID or a Reportable
				Non-Member identifier. If the Order Origination Code is 'F', this field must be blank.
11	Routed Order ID	Alphanumeric (40)	С	Values: Any alphanumeric not containing a delimiter or leading zeroes.
				Required when the Order Origination Code is 'W', and the Received Method Code is 'E'.
12	Order Received Timestamp	Numeric (17)	M	Format: YYYYMMDDHHMMSSCCC
13	Received Method Code	Alphanumeric (1)	M	Values: 'E' or 'N'. Case sensitive.

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
14	Issue Symbol ID	Alphanumeric (14)	M	Case sensitive.
				Issue symbol for a valid OATS reportable security, for the
				Order Received Date. For exchange listed securities, the
				symbol format must follow the format published by the
				primary listing market.
15	Buy/Sell Code	Alphanumeric (2)	M	Values: 'B', 'SL', 'SS', or 'SX'. Case sensitive.
16	Shares Quantity	Numeric (11)	M	Values: Any integer greater than zero. A fractional share order of less than one (1) share must be rounded up to one (1).
				For reserved size orders, must be the sum of displayed size and reserved size.
17	Limit Price	Numeric (18,8)	С	If entered, must be greater than 0. If entered, a Time in Force Code must be provided.
18	Customer Instruction Flag	Alphanumeric (1)	С	Values: 'Y' or 'N', Case sensitive.
				For Non-ECNs, must be provided if a Limit Price is populated.
19	Stop Price	Numeric (18,8)	С	If entered, a Time in Force Code must be provided.
20	Time in Force Code	Alphanumeric (3)	С	Values: 'DAY', 'GTD', 'GTT', 'GTC', or 'GTM'. A blank is interpreted by OATS as a market order. Case sensitive.
21	Expiration Date	Date (8)	С	Format: YYYYMMDD
				Required if the Time in Force is 'GTD', 'DAY', or 'GTT'. If the Time in Force Code is 'DAY', the Expiration Date must be equal to the Order Received Date or one trading day greater than the Order Received Date. If the Time in Force code is 'GTM' the expiration date will be derived by OATS as the last calendar day of the current month.
				Must be blank if the Time in Force is <blank>, 'GTM', or 'GTC'.</blank>
22	Expiration Time	Numeric (9)	С	Format: HHMMSSCCC
				Required if the Time in Force is 'GTT'. Must be blank if the Time in Force is blank>, 'DAY', 'GTM', 'GTC', or 'GTD'.
23	Do Not Reduce/Do Not Increase Code	Alphanumeric (3)	С	Values: 'DNR', 'DNI', or 'DIR', Case sensitive.

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
24	Special Handling Code 1	Alphanumeric (3)	С	Values: 'ADD', 'ALO', 'AOB', 'AON', 'CND', 'CNH', 'CPR', 'CSH', 'DIR', 'DLO', 'E.W', 'FBA', 'F0', 'F3', 'F6', 'F7', 'F8', 'F9', 'FA', 'FB', 'Fb', 'FC', 'Fc', 'FD', 'Fd', 'Fe', 'FH', 'FI', 'FI', 'FK', 'FL', 'FM', 'FN', 'FO', 'FOK', 'FP', 'FQ', 'FR', 'FS', 'FT', 'FW', 'FX', 'FY', 'FZ', 'G', 'IDX', 'IO', 'IOC', 'ISO', 'LOC', 'LOO', 'MAC', 'MAO', 'MOB', 'MOC', 'MOO', 'MPT', 'MQT', 'MTL', 'ND', 'NH', 'OPO', 'OPT', 'OVD', 'PEG', 'RSV', 'S.W', 'SCL', 'SLD', 'SLR', 'SLQ', 'SOQ', 'STP', 'TAI', 'TMO', 'TS', 'WRK'. Case sensitive. If the ATS Display Indicator is populated, only the following list of Special Handling Codes is permitted: 'ALO', 'AON', 'CND', 'CPR', 'DIR', 'FOK', 'IOC', 'ISO', 'MQT', 'NH', 'OPO', 'RSV', 'SLD', 'STP', 'TAI', 'F6'.
25	Special Handling Code 2	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
26	Special Handling Code 3	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
27	Special Handling Code 4	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
28	Special Handling Code 5	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
29	Trading Session Code	Alphanumeric (12)	M	Values: 'FOR', 'PRE', 'PREREG', 'REG', 'REGPOST', 'POST', 'PREPOST', or 'ALL'.
30	Receiving Department ID	Alphanumeric (12)	С	Values: 'A', 'ATS', 'MA', 'T', or 'O'. Must be provided if the Order Origination Code is 'W' or if the Order Origination Code is 'F' and the Account Type Code is 'A', 'E', or 'I'. If the Order Origination Code is 'F' and the Account Type Code is 'C', the Receiving Department ID or the Originating Department ID must be populated. If the Order Origination Code is 'F', then the Receiving Department ID cannot be 'MA'.
31	Originating Department ID	Alphanumeric (12)	С	Values: 'A', 'ATS', 'T', or 'O'. Must be blank if the Order Origination Code is 'W'. Must be provided if the Order Origination Code is 'F' and the Account Type Code is 'O', 'P' or 'X'. If the Order Origination Code is 'F' and the Account Type Code is 'C', the Receiving Department ID or the Originating Department ID must be populated.
32	Account Type Code	Alphanumeric (1)	M	Values: 'A', 'C', 'E', 'I', 'O', 'P', 'U', 'X'. Case sensitive.

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
33	Program	Alphanumeric (1)	M	Values: 'Y', 'N', or 'X'. Case sensitive.
	Trading Code			If the Order Origination Code is 'F' this field must not be equal to 'X'.
34	Arbitrage Code	Alphanumeric (1)	M	Values: 'Y', 'N', 'X'. Case sensitive.
				If the Order Origination Code is 'F' this field must not be equal to 'X'.
35	Member Type Code	Alphanumeric (1)	M	Values: 'A', 'C', 'E', 'M', 'N', 'F' or 'X', Case sensitive.
36	ATS Display Indicator	Alphanumeric (1)	С	Value: 'S', 'Y', 'N' or blank. Case sensitive.
				Required if the Order Receiving Firm MPID is an ECN. Required if the Order Receiving Firm MPID is an ATS and the Issue Symbol ID is a NMS stock.
37	Order Cancel	Numeric (17)	С	Format: YYYYMMDDHHMMSSCCC
	Timestamp			Required for orders fully cancelled on the same day the order was received.
38	Cancelled by	Alphanumeric (1)	С	Values: 'C' or 'F'. Case sensitive.
	Flag			Required for orders fully cancelled on the same day the order was received.
39	Information Barrier ID	Alphanumeric (12)	С	Value: Any alphanumeric not containing a delimiter.
40	Desk Received Timestamp	Numeric (17)	С	Format: YYYYMMDDHHMMSSCCC Required for orders that are fully transmitted to an internal desk or department the same day the firm received the
				order.
41	Desk Type Code	Alphanumeric (12)	С	Values: 'A', 'AR', 'B', 'C', 'CR', 'D', 'EC', 'IN', 'IS', 'O', 'PF', 'PR', 'PT', 'S', 'SW', 'T', or 'TR'.
				Required for orders that are fully transmitted to an internal desk or department the same day the firm received the order.
42	Desk Special Handling Code	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
43	Desk Special Handling Code 2	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
44	Desk Special Handling Code	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
45	Desk Special Handling Code 4	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
46	Desk Special Handling Code 5	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
47	TMO Trigger Timestamp	Numeric (17)	С	Format: YYYYMMDDHHMMSSCCC Required for orders with any Special Handling Code of 'TMO'.

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
48	Negotiated Trade Flag	Alphanumeric (1)	С	Value: 'Y'. Case sensitive.
				Must be populated when an order is the result of a negotiated trade between two members where both members, for OATS purposes, are considered to have executed the trade and must submit an Execution Report to OATS. The flag should be set to 'Y' when a member is required to report a new order and execution as the result of an incoming negotiation that results in a trade.
49	Order	Alphanumeric (1)	M	Values: 'F' or 'W'
49	Origination Code	Aiphanumeric (1)	IVI	values. 1º of w
50	Rejected ROE ID	Numeric (15)	С	Must be blank when the Rejected ROE Resubmit Flag is blank
51	ROE Memo	Alphanumeric (40)	C	Value: Any alphanumeric not containing a delimiter
applic	able only to ATSs llowing fields are Participation	in NMS stocks. If a f		rading Centers in a Tick Pilot Symbol. Fields 52 – 63 are not a Tick Size Pilot Trading Center and is not an ATS, Values: 'T', 'A', Y', or blank.
	Flag			 Required when either of the following conditions are true: Order Receiving Firm is a Tick Pilot Participant Order Receiving Firm is an ATS, is an ADF Trading Center and the Issue Symbol ID is a NMS stock.
53	Display Size	Numeric (11)	С	Values: Any integer greater than zero. A fractional share order of less than 1 share must be rounded up to 1. If the order is hidden, must be set to 0.
				Required if the Participation Flag is 'A' or if the ATS Display Indicator is 'S' or 'Y' and the Issue Symbol ID is a NMS stock.
54	Routable Flag	Alphanumeric (1)	С	Values: 'Y' or 'N'. Case sensitive.
				Required if the Participation Flag is populated or if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
55	Display Price	Numeric(18,8)	С	Values: Any integer greater than zero.
				If the order is hidden, must be blank. Required if the ATS Display Indicator is 'S' or 'Y', the Issue Symbol ID is a NMS stock, and the Display Size > 0.
56	NBBO Bid Price	Numeric(18,8)	С	Values: Any integer greater than zero. Must be populated with the NRR price in effect at the time.
				Must be populated with the NBB price in effect at the time of order receipt.
				Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.

OATS REPORTING TECHNICAL SPECIFICATIONS

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
57	NBBO Ask Price	Numeric(18,8)	С	Values: Any integer greater than zero.
				Must be populated with the NBO price in effect at the time of order receipt.
				Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
58	NBBO Source	Alphanumeric(1)	С	Values 'D', 'H', or 'S'.
				Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
59	NBBO Matching	Numeric(11)	С	Format : YYYYMMDD
	Engine Lookup Date			Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
60	NBBO Matching	Numeric(15,9)	С	Format: HHMMSS.CCCNNNNNN
	Engine Lookup Time			Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
61	ATS Order Type	Alphanumeric(40)	С	Values: Any alphanumeric not containing a delimiter.
				Must be equal to a unique order type identifier provided to FINRA by the ATS.
				Required if the ATS Display Indicator is populated, the Issue Symbol ID is a NMS stock.
62	Processing Sequence Number	Alphanumeric(40)	С	Values: Any alphanumeric not containing a delimiter.
63	ADF Quote ID	Alphanumeric(40)	С	Values: Any alphanumeric not containing a delimiter.
				Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock and the Participation Flag is 'A' or 'Y'.
64	End of Record Marker	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line Feed).

Route Report

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#OE#'—identifies an order event record. Case sensitive.
2	Order Event	Alphanumeric (2)	M	'RT'—identifies the order event record type as a routing
	Type Code			record. Case sensitive.
3	Action Type Code	Alphanumeric (1)	M	Values: 'N', 'C', 'D', or 'R'. Case sensitive.
4	Firm ROE ID	Alphanumeric (12)	С	Values: Any alphanumeric not containing a delimiter.
5	Correction/	Numeric (17)	С	Format: YYYYMMDDHHMMSSCCC
	Deletion Timestamp			Required if the Action Type Code is 'C', 'D', or 'R'.
6	Rejected ROE	Alphanumeric (1)	С	Value is: 'Y', Case sensitive.
	Resubmit Flag			
				Required when the ROE has been Rejected by OATS and
				has been corrected for resubmission.
7		Alphanumeric (4)	C	Case sensitive.
	Firm MPID			
				If populated, must be equal to the Order Receiving Firm
				MPID in the Header of the FORE.
8	Order Receiving	Numeric (17)	M	Format: YYYYMMDDHHMMSSCCC
	Firm Order			
9	Received Date Order Receiving	Alphanumeric (40)	M	Values: Any alphanumeric not containing a delimiter.
9	Firm Order ID	Aiphanumeric (40)	IVI	values. Any alphanument not containing a definiter.
10	Sent to Firm	Alphanumeric (9)	С	Case sensitive.
10	MPID	Triphanameric ())		Cuse sensitive.
	WII ID			Required if the Destination Code is 'M', 'E', 'N' or 'A'.
				Optional if the order was routed to a national securities
				exchange or to a foreign firm. When populated, must be a
				valid firm identifier for the Order Sent Timestamp. If
				routed to a FINRA member, must be populated with a
				FINRA MPID. If routed to a Reportable Non-Member, must
				be populated with a Reportable Non-Member identifier. If
				routed to a Foreign broker-dealer, must be blank or contain
				an identifier of the Foreign firm; must not be populated with
				a FINRA member MPID or a Reportable Non-Member
				identifier.
11	Routed Order	Alphanumeric (40)	С	Values: Any alphanumeric not containing a delimiter or
	ID			leading zeroes.
				Required if the Routing Method Code is 'E', 'F' or 'S'.
				Must be unique for the MPID, Order Sent Date, Connection
				ID, and Sent to MPID (if routed to another member or
				Reportable Non-Member) or Destination Code and
				Exchange Participant ID (if routed to a national securities
				exchange), except in instances when the route has a special
12	Iggue Cross al	Alphonumaria (14)	М	routing condition.
12	Issue Symbol ID	Alphanumeric (14)	M	Case sensitive.
	עוו			Issue symbol for a valid OATS reportable security, for the
				Order Sent Date. For exchange listed securities, the symbol
				format must follow the format published by the primary
				listing market.
13	Order Sent	Numeric (17)	M	Format: YYYYMMDDHHMMSSCCC
	1	` /	1	

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
•	Timestamp	(1 \)		
14	Routed Shares Quantity	Numeric (11)	M	Values: Any integer greater than zero. A fractional share order of less than one (1) share must be rounded up to one (1).
				If the order was bunched, this would be the total number of bunched shares routed.
15	Code	Alphanumeric (1)	M	Values: 'E', 'F', 'N' or 'S'. Case sensitive.
16	Special Routing Condition	Alphanumeric (1)	С	Values: 'X', 'Y' or blank. Case sensitive. Required for orders when the identified order is part of a bunched order or represents a modification to an order previously routed to a national securities change that includes duplicated Routed Order ID.
				The Special Routing Condition of 'X' can only be used when routing to a national securities exchange.
17	Originating MPID	Alphanumeric(9)	С	Must be provided when the MPID of the original Order Receiving Firm that, due to a merger or acquisition, needs to link to a secondary event with a different Order Receiving Firm MPID.
18	Destination Code	Alphanumeric (2)	M	Values: 'A', 'E', 'M', 'N', 'F', 'X', 'OA', 'OB', 'OC', 'OE', 'OH', 'OI', 'OJ', 'OM', 'OP', 'OQ', 'OT', 'OX', 'OZ', 'XA', XB', 'XC', 'XF', 'XI', 'XJ', 'XK', 'XM', 'XN', 'XO', 'XP', 'XQ', 'XT', 'XV', 'XW', 'XX', 'XY', or 'XZ'. Case sensitive.
19	Routed Order Type Indicator	Alphanumeric (1)	M	Values: 'L' or 'M'. Case sensitive.
20	Route Price	Numeric(18,8)	С	Required if the Routed Order Type Indicator is 'L'. If entered, must be greater than 0.
21	ISO Indicator	Alphanumeric (1)	С	Value: 'Y' or 'T'. Case sensitive.
				Required if the order was sent as an Intermarket Sweep Order or Trade-at Intermarket Sweep Order.
22	Short Sale Exempt Indicator	Alphanumeric (1)	С	Value: 'Y'. Case sensitive. Required if the order may be marked "short exempt" consistent with SEC Rule 201.
23	Exchange Participant ID	Alphanumeric (8)	С	Case sensitive. Required for orders routed to a national securities exchange.
24	Connection ID	Alphanumeric(12)	С	Value: Any alphanumeric not containing a delimiter. Case sensitive.
25	Rejected ROE ID	Numeric (15)	С	Must be blank when the Rejected ROE Resubmit Flag is blank.
26	ROE Memo	Alphanumeric(40)	С	Value: Any alphanumeric not containing a delimiter.
27	End of Record Marker	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line Feed).

Desk Report

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#OE#'—identifies an order event record. Case sensitive.
2	Order Event	Alphanumeric (2)	M	'DS'—identifies the order event record type as a desk
	Type Code	1		record. Case sensitive.
3	Action Type Code	Alphanumeric (1)	M	Values: 'N', 'C', 'D', or 'R', Case sensitive.
4	Firm ROE ID	Alphanumeric (12)	С	Values: Any alphanumeric not containing a delimiter.
5	Correction/ Deletion	Numeric (17)	С	Format: YYYYMMDDHHMMSSCCC
	Timestamp	A1.1 ' (1)	C	Required if the Action Type Code is 'C', 'D', or 'R'.
6	Rejected ROE Resubmit Flag	Alphanumeric (1)	С	Value is: 'Y', Case sensitive. Required when the ROE has been Rejected by OATS and
				has been corrected for resubmission.
7	Order Receiving Firm MPID	Alphanumeric (4)	С	Case sensitive.
				If populated, must be equal to the Order Receiving Firm MPID in the Header of the FORE.
8	Order Receiving Firm Order Received Date	, ,	M	Format: YYYYMMDDHHMMSSCCC
9	Order Receiving Firm Order ID	Alphanumeric (40)	M	Values: Any alphanumeric not containing a delimiter.
10	Information Barrier ID	Alphanumeric (12)	С	Value: Any alphanumeric not containing a delimiter.
11	Issue Symbol ID	Alphanumeric (14)	M	Case sensitive. Issue symbol for a valid OATS reportable security, for the Desk Received Date. For exchange listed securities, the symbol format must follow the format published by the primary listing market.
12	Desk Received Timestamp	Numeric (17)	M	Format: YYYYMMDDHHMMSSCCC
13	Originating MPID	Alphanumeric (9)	С	Must be provided when the MPID of the original Order Receiving Firm that, due to a merger or acquisition, needs to link to a secondary event with a different Order Receiving Firm MPID.
14	Desk Shares Quantity	Numeric (11)	M	Values: Any integer greater than zero. A fractional share order of less than one (1) share must be rounded up to one (1). The number of shares transmitted to another desk or department within a firm.
15	Desk Type Code	Alphanumeric (12)	M	Values: 'A', 'AR', 'B', 'C', 'CR', 'D', 'EC', 'IN', 'IS', 'O', 'PF', 'PR', 'PT', 'S', 'SW', 'T', or 'TR'.
16	Desk Special Handling Code 1	Alphanumeric (3)	С	Values: 'ADD', 'ALO', 'AOB', 'AON', 'CND', 'CNH', 'CPR', 'CSH', 'DIR', 'DLO', 'E.W', 'FBA', 'F0', 'F3', 'F6', 'F7', 'F8', 'F9', 'FA', 'FB', 'Fb', 'FC', 'Fc', 'FD', 'Fd', 'Fe', 'FH', 'FI', 'FK', 'FL', 'FM', 'FN', 'FO', 'FOK', 'FP', 'FQ', 'FR', 'FS', 'FT', 'FW', 'FX', 'FY', 'FZ', 'G', 'IDX', 'IO', 'IOC', 'ISO', 'LOC', 'LOO', 'MAC', 'MAO', 'MOB', 'MOC', 'MOO', 'MPT', 'MQT', 'MTL', 'ND', 'NH', 'OPO', 'OPT', 'OVD', 'PEG', 'RSV',

OATS REPORTING TECHNICAL SPECIFICATIONS

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
				'S.W', 'SCL', 'SLD', 'SLR', 'SLQ', 'SOQ', 'STP', 'TAI', 'TMO', 'TS', 'WRK'. Case sensitive.
				If the ATS Display Indicator is populated, only the following list of Special Handling Codes is permitted: 'ALO', 'AON', 'CND', 'CPR', 'DIR', 'FOK', 'IOC', 'ISO', 'MQT', 'NH', 'OPO', 'RSV', 'SLD', 'STP', 'TAI', 'F6'.
17	Desk Special Handling Code 2	Alphanumeric (3)	С	Refer to Desk Special Handling Code 1 for list of values.
18	Desk Special Handling Code 3	Alphanumeric (3)	С	Refer to Desk Special Handling Code 1 for list of values.
19	Desk Special Handling Code 4	Alphanumeric (3)	С	Refer to Desk Special Handling Code 1 for list of values.
20	Desk Special Handling Code 5	Alphanumeric (3)	С	Refer to Desk Special Handling Code 1 for list of values.
21	Rejected ROE ID	Numeric (15)	С	Must be blank when Rejected ROE Resubmit Flag is blank.
22	ROE Memo	Alphanumeric(40)	С	Value: Any alphanumeric not containing a delimiter.
23	End of Record Marker	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line Feed).

Execution Report

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#OE#' Case sensitive.
2	Order Event Type Code	Alphanumeric (2)	M	'EX' is the value for this report. Case sensitive.
3	Action Type Code	Alphanumeric (1)	M	Values: 'N', 'C', 'D', or 'R'. Case sensitive.
4	Firm ROE ID	Alphanumeric (12)	C	Values: Any alphanumeric not containing a delimiter.
5	Correction/ Deletion Timestamp	Numeric (17)	С	Format: YYYYMMDDHHMMSSCCC
6	Rejected ROE	Alphanumeric (1)	С	Required if the Action Type Code is 'C', 'D', or 'R'. Value is: 'Y'. Case sensitive.
O	Resubmit Flag			Required when the ROE has been Rejected by OATS and has been corrected for resubmission.
7	Order Receiving Firm MPID	Alphanumeric (4)	С	Case sensitive. If populated, must be equal to the Order Receiving Firm MPID in the Header of the FORE.
8	Order Receiving Firm Order Received Date	Numeric (17)	M	Format: YYYYMMDDHHMMSSCCC
9	Order Receiving Firm Order ID	Alphanumeric (40)	M	Values: Any alphanumeric not containing a delimiter.
10	Execution Timestamp	Numeric (17)	M	Format: YYYYMMDDHHMMSSCCC
11	OATS Trade ID	Alphanumeric (20)	С	Values: Any alphanumeric not containing a delimiter, spaces, blanks, or leading zeroes. Must be provided when a trade is executed by the member and reported to a FINRA transaction reporting system. Must be unique within the firm within the day except in instances involving an agency cross where one side of the cross is comprised of multiple orders. Each of the orders on the same side of market involved in the single agency cross execution may share the same OATS Trade ID.
12	Execution Quantity	Numeric (11)	M	Values: Any integer greater than zero. A fractional share order of less than one (1) share must be rounded up to one (1).
13	Trader Terminal ID	Alphanumeric (12)	M	Values: Any alphanumeric not containing a delimiter.
14	Reporting Exception Code	Alphanumeric (1)	С	Values: 'P', 'M', 'R', 'A', 'T', or 'F'. Must be provided if the execution is not required to be reported to a FINRA transaction reporting system.
15	·	Alphanumeric (14)	M	Case sensitive. Issue symbol for a valid OATS reportable security, for the Execution Date. For exchange listed securities, the symbol format must follow the format published by the primary listing market.
16	Execution Type Indicator	Alphanumeric (1)	M	Values: 'F' or 'P'. Case sensitive.

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
17	Leaves Quantity	Numeric (11)	С	Values: Any integer greater than or equal zero. A fractional share order of less than one (1) share must be rounded up to one (1).
				Must be provided when the Execution Type Indicator value is 'P', If the partial execution represents the remaining portion of an order, the value should be zero.
18	Market Center ID	Alphanumeric (2)	С	Values: 'A', 'B', 'C', 'D', 'DN', 'F', 'I', 'J', 'K', 'L', 'M', 'N', 'O', 'P', 'Q', 'V', 'W', 'X', 'Y' or 'Z'. Case sensitive.
19	Originating MPID	Alphanumeric (9)	С	Must be provided when the MPID of the original Order Receiving Firm that, due to a merger or acquisition, needs to link to a secondary event with a different Order Receiving Firm MPID.
20	Execution Price	Numeric (18,8)	M	Must be the same price that is reported to the applicable transaction reporting association for trade reporting purposes.
21	Capacity Code	Alphanumeric (1)	M	Values: 'A', 'P', 'R'. Case sensitive.
				Must equal 'R' if the reporting exception code is 'R'. Must equal 'A' if the reporting exception code is 'A' or 'T'. Must equal 'P' if the reporting exception code is 'P'.
22	Rejected ROE ID	Numeric (15)	С	Must be blank when the Rejected ROE Resubmit Flag is blank.
23	ROE Memo	Alphanumeric(40)	С	Value: Any alphanumeric not containing a delimiter.
	Retail Investor Order Flag		C	Not a Tick Size Pilot Trading Center and is not an ATS, Values: 'Y' or 'N'. Case sensitive.
	Order Mag			Required if the firm is a Tick Size Pilot Trading Center.
25	NBBO Bid Price at Execution	Numeric(18,8)	С	Values: Any integer greater than zero.
				Must be populated with the NBB price in effect immediately prior to order execution.
				Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
26	NBBO Ask Price at	Numeric(18,8)	С	Values: Any integer greater than zero.
	Execution			Must be populated with the NBO price in effect immediately prior to order execution.
				Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
27	NBBO Source at Execution	Alphanumeric(1)	С	Values 'D', 'H', or 'S'. Required if the ATS Display Indicator is populated and the
				Issue Symbol ID is a NMS stock.
28	NBBO Matching	Numeric(11)	С	Format : YYYYMMDD
	Engine Lookup Date at			Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.

OATS REPORTING TECHNICAL SPECIFICATIONS

APPENDIX C —ORDER REPORT FORMATS

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
29	NBBO	Numeric(15,9)	C	Format: HHMMSS.CCCNNNNNN
	Matching			
	Engine Lookup			Required if the ATS Display Indicator is populated and the
	Time at			Issue Symbol ID is a NMS stock.
	Execution			
30	End of Record	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line
	Marker			Feed).

Cancel Report

Seq.	Name	Data Type/ Length	M/C	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#OE#' Case sensitive.
2	Order Event Type Code	Alphanumeric (2)	M	'CL' is the value for this report. Case sensitive.
3	Action Type Code	Alphanumeric (1)	M	Values: 'N', 'C', 'D', or 'R'. Case sensitive.
4	Firm ROE ID	Alphanumeric (12)	C	Values: Any alphanumeric not containing a delimiter.
5	Correction/ Deletion Timestamp	Numeric (17)	С	Format: YYYYMMDDHHMMSSCCC Required if the Action Type Code is 'C', 'D', or 'R'.
6	Rejected ROE Resubmit Flag	Alphanumeric (1)	С	Required when the ROE has been Rejected by OATS and has been corrected for resubmission. Value is: 'Y', Case sensitive.
7	Order Receiving Firm MPID	Alphanumeric (4)	С	If populated, must be equal to the Order Receiving Firm MPID in the Header of the FORE. Case sensitive.
8	Order Receiving Firm Order Received Date	Numeric (17)	M	Format: YYYYMMDDHHMMSSCCC
9	Order Receiving Firm Order ID	Alphanumeric (40)	M	Values: Any alphanumeric not containing a delimiter.
10	Issue Symbol ID	Alphanumeric (14)	M	Case sensitive. Issue symbol for a valid OATS reportable security, for the Order Received Date. For exchange listed securities, the symbol format must follow the format published by the primary listing market.
11	Order Cancel Timestamp	Numeric (17)	M	Format: YYYYMMDDHHMMSSCCC
12	Cancel Type Flag	Alphanumeric (1)	M	Values: 'F' or 'P'. Case sensitive.
13	Cancel Quantity	Numeric (11)	С	Values: Any integer greater than zero. A fractional share order of less than one (1) share must be rounded up to one.
14	Cancel Leaves Quantity	Numeric (11)	С	Required when the Cancel Type Flag value is 'P'. Values: Any integer greater than or equal to zero. A fractional share order of less than one (1) share must be rounded up to one (1).
15	Cancelled by	Alphanumeric (1)	M	Required when the Cancel Type Flag value is 'P', If the partial cancellation represents the remaining portion of an order, the value should be zero. Values: 'C' or 'F'. Case sensitive.
	Flag			
16	Originating MPID	Alphanumeric (9)	С	Must be provided when the MPID of the original Order Receiving Firm that, due to a merger or acquisition, needs to link to a secondary event with a different Order Receiving Firm MPID.
17	Rejected ROE ID	Numeric (15)	С	Must be blank when Rejected ROE Resubmit Flag is blank.
18	ROE Memo	Alphanumeric(40)	С	Value: Any alphanumeric not containing a delimiter.
19	End of Record Marker	(1 or 2)	M	Values: LF (Line Feed), or CR/LF (Carriage Return/Line Feed)

Cancel/Replace Report

Seq.	Name	Data Type/ Length	M/C	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#OE#' Case sensitive.
2	Order Event Type Code	Alphanumeric (2)	M	'CR' is the value for this report. Case sensitive.
3	Action Type Code	Alphanumeric (1)	M	Values: 'N', 'C', 'D', or 'R'. Case sensitive.
4	Firm ROE ID	Alphanumeric (12)	С	Values: Any alphanumeric not containing a delimiter.
5	Correction/ Deletion Timestamp	Numeric (17)	С	Format: YYYYMMDDHHMMSSCCC Required if the Action Type Code is 'C', 'D', or 'R'.
6	Rejected ROE Resubmit Flag	Alphanumeric (1)	С	Value is 'Y', Case sensitive. Required when the ROE has been Rejected by OATS and
	0.1. D	111 : (4)		has been corrected for resubmission.
7	Firm MPID	Alphanumeric (4)	С	Case sensitive. If populated, must be equal to the Order Receiving Firm MPID in the Header of the FORE.
8	Replaced Order Received Date	Numeric (17)	M	Format: YYYYMMDDHHMMSSCCC
9	Replaced Firm Order ID	Alphanumeric (40)	M	Order received date for the cancelled order. Values: Any alphanumeric not containing a delimiter.
				Order ID for the cancelled order.
10	Order Receiving Firm Order Received Date	Numeric (17)	M	Format: YYYYMMDDHHMMSSCCC Order received date for the replacement order. Date portion must equal the date portion of the Order Received Timestamp (for orders received on or after October 17, 2011).
11	Order Receiving Firm Order ID	Alphanumeric (40)	M	Values: Any alphanumeric not containing a delimiter. Order ID for the replacement order. Must be unique for the firm within the Order Received Date.
13	Routing Firm MPID Routed Order ID	Alphanumeric (9) Alphanumeric (40)	С	Case sensitive. Must be a FINRA member MPID for the Order Received Timestamp if the Order Origination Code is 'W' and the Member Type Code is 'C', 'E' or 'M'. If the Order Origination Code is 'W' and the Member Type Code is 'N' or 'A', must be populated with Reportable Non-Member identifier. If the Order Origination Code is 'W' and the Member Type Code is 'F' or 'X', may be blank; must not be populated with a FINRA member MPID or a Reportable Non-Member identifier. If the Order Origination Code is 'F', this field must be blank. Values: Any alphanumeric not containing a delimiter or leading zeroes. Required when the Order Origination Code is 'W', the Received Method Code is 'E'.
14	Order Received Timestamp	Numeric (17)	M	Format: YYYYMMDDHHMMSSCCC

Seq.	Name	Data Type/ Length	M/C	Permissible Values and Instructions
15	Received Method Code	Alphanumeric (1)	M	Values: 'E' or 'N'. Case sensitive.
16	Issue Symbol ID	Alphanumeric (14)	M	Case sensitive. Issue symbol for a valid OATS reportable security, for the replacement Order Received Date. For exchange listed securities, the symbol format must follow the format published by the primary listing market.
17	Buy/Sell Code	Alphanumeric (2)	M	Values: 'B', 'SL', 'SS', or 'SX'. Case sensitive.
18	Shares Quantity	Numeric (11)	M	Values: Any integer greater than zero. A fractional share order of less than one (1) share must be rounded up to one (1). For reserved size orders, must be the sum of displayed size
				and reserved size.
19	Limit Price	Numeric (18,8)	С	If entered, must be greater than 0. If entered, a Time in Force Code should be provided.
20	Customer Instruction Flag	Alphanumeric (1)	С	Values: 'Y' or 'N'. Case sensitive. For Non-ECNs, must be provided if a Limit Price is populated.
21	Stop Price	Numeric (18,8)	С	If entered, a Time in Force Code must be provided.
22	Time in Force Code	Alphanumeric (3)	С	Values: 'DAY', 'GTD', 'GTT', 'GTC', or 'GTM'. Case sensitive. A blank is interpreted by OATS as a market order.
23	Expiration Date	Date (8)	С	Format: YYYYMMDD
23	Expiration Date	Date (6)	C	Required if the Time in Force is 'GTD', 'DAY', or 'GTT'. If the Time in Force Code is 'DAY' the Expiration Date must be equal to Order Received Date or one trading day greater than the Order Received Date. If the Time in Force code is 'GTM' the expiration date will be derived by OATS as the last calendar day of the current month.
				Must be blank if the Time in Force is <blank>, 'GTM', or 'GTC'.</blank>
24	Expiration Time	Numeric (9)	С	Format: HHMMSSCCC Required if the Time in Force is 'GTT'. Must be blank if the Time in Force is <blank>, 'DAY', 'GTM', 'GTC', or 'GTD'.</blank>
25	Do Not Reduce/Do Not Increase Code	Alphanumeric (3)	С	Values: 'DNR', 'DNI', or 'DIR'. Case sensitive.

Seq.	Name	Data Type/ Length	M/C	Permissible Values and Instructions
26	Special Handling Code 1	Alphanumeric (3)	С	Values: 'ADD', 'ALO', 'AOB', 'AON', 'CND', 'CNH', 'CPR', 'CSH', 'DIR', 'DLO', 'E.W', 'FBA', 'F0', 'F3', 'F6', 'F7', 'F8', 'F9', 'FA', 'FB', 'Fb', 'FC', 'Fc', 'FD', 'Fd', 'Fe', 'FH', 'FI', 'FK', 'FL', 'FM', 'FN', 'FO', 'FOK', 'FP', 'FQ', 'FR', 'FS', 'FT', 'FW', 'FX', 'FY', 'FZ', 'G', 'IDX', 'IO', 'ISO', 'LOC', 'LOO', 'MAC', 'MAO', 'MOB', 'MOC', 'MOO', 'MPT', 'MQT', 'MTL', 'ND', 'NH', 'OPO', 'OPT', 'OVD', 'PEG', 'RSV', 'S.W', 'SCL', 'SLD', 'SLR', 'SLQ', 'SOQ', 'STP', 'TAI', 'TMO', 'TS', 'WRK'. Case sensitive. If the ATS Display Indicator is populated, only the following list of Special Handling Codes is permitted:
				'ALO', 'AON', 'CND', 'CPR', 'DIR', 'FOK', 'IOC', 'ISO', 'MQT', 'NH', 'OPO', 'RSV', 'SLD', 'STP', 'TAI', 'F6'.
27	Special Handling Code 2	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
28	Special Handling Code 3	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
29	Special Handling Code 4	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
30	Special Handling Code 5	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
31	Trading Session Code	Alphanumeric (12)	M	Values: 'FOR', 'PRE', 'PREREG', 'REG', 'REGPOST', 'POST', 'PREPOST', or 'ALL'.
32	Receiving Department ID	Alphanumeric (12)	С	Values: 'A', 'ATS', 'MA', 'T', or 'O'. Must be provided if the Order Origination Code is 'W' or if the Order Origination Code is 'F' and the Account Type Code is 'A', 'E', or 'I'. If the Order Origination Code is 'F' and the Account Type Code is 'C', the Receiving Department ID or the Originating Department ID must be populated. If the Order Origination Code is 'F', then the Receiving Department ID cannot be 'MA'.
33	Originating Department ID	Alphanumeric (12)	С	Values: 'A', 'ATS', ''T', or 'O'. Must be blank if the Order Origination Code is 'W'. Must be provided if the Order Origination Code is 'F' and the Account Type Code is 'O', 'P' or 'X'. If the Order Origination Code is 'F' and the Account Type Code is 'C', the Receiving Department ID or the Originating Department ID must be populated.
34	Account Type Code	Alphanumeric (1)	M	Values: 'A', 'C', 'E', 'I', 'O', 'P', 'U', 'X'. Case sensitive.

Seq.	Name	Data Type/ Length	M/C	Permissible Values and Instructions
35	Program Trading Code	Alphanumeric (1)	M	Values: 'Y', 'N', or 'X'. Case sensitive.
				If the Order Origination Code is 'F' this field must not be equal to 'X'.
36	Arbitrage Code	Alphanumeric (1)	M	Values: 'Y', 'N', 'X'. Case sensitive.
				If the Order Origination Code is 'F' this field must not be equal to 'X'.
37	Member Type Code	Alphanumeric (1)	M	Values: 'A', 'C', 'E', 'M', 'N', 'F' or 'X'. Case sensitive.
38	ATS Display Indicator	Alphanumeric (1)	С	Value: 'S', 'Y', 'N' or blank. Case sensitive.
				Required if the Order Receiving Firm MPID is an ECN. Required if the Order Receiving Firm MPID is an ATS and the Issue Symbol ID is a NMS stock.
39	TMO Trigger Timestamp	Numeric (17)	С	Format: YYYYMMDDHHMMSSCCC
	Timestamp			Required for orders with any Special Handling Code of 'TMO'.
40	Modified by Flag	Alphanumeric (1)	M	Values: 'C' or 'F'. Case sensitive.
41	Originating MPID	Alphanumeric (9)	С	Must be provided when the MPID of the original Order Receiving Firm that, due to a merger or acquisition, needs to link to a secondary event with a different Order Receiving Firm MPID.
42	Order Origination Code	Alphanumeric (1)	M	Values: 'F' or 'W'.
43	Information Barrier ID	Alphanumeric(12)	С	Value: Any alphanumeric not containing a delimiter.
44	Rejected ROE ID	Numeric (15)	С	Must be blank when Rejected ROE Resubmit Flag is blank.
45	ROE Memo	Alphanumeric(40)	С	Value: Any alphanumeric not containing a delimiter.
applic the fo	able only to ATSs llowing fields are 1	in NMS stocks. If a fact required:	firm is 1	rading Centers in a Tick Pilot Symbol. Fields 46-57 are not a Tick Size Pilot Trading Center and is not an ATS,
46	Participation Flag	Alphanumeric (1)	С	Values: 'T', 'A', Y', or blank.
				 Required when either of the following conditions are true: Order Receiving Firm is a Tick Pilot Participant Order Receiving Firm is an ATS, is an ADF Trading Center and the Issue Symbol ID is a NMS stock.
47	Display Size	Numeric (11)	С	Values: Any integer greater than zero. A fractional share order of less than 1 share must be rounded up to 1.
				If the order is hidden, must be set to 0.
				Required if the Participation Flag is 'A'. Required if the ATS Display Indicator is 'S' or 'Y and the Issue Symbol ID is a NMS stock.

Seq.	Name	Data Type/ Length	M/C	Permissible Values and Instructions
48	Routable Flag	Alphanumeric (1)	С	Values: 'Y' or 'N'. Case sensitive.
				Required if the Participation Flag is populated or if the ATS Display Indicator is populated.
49	Display Price	Numeric(18,8)	С	Values: Any integer greater than zero.
				If the order is hidden, must be blank.
				Required if the ATS Display Indicator is 'S' or 'Y', the Issue Symbol ID is a NMS stock, and the Display Size > 0.
50	NBBO Bid	Numeric(18,8)	C	Values: Any integer greater than zero.
	Price			Must be populated with the NBB price in effect at the time of order receipt.
				Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
51	NBBO Ask	Numeric(18,8)	C	Values: Any integer greater than zero.
	Price			Must be populated with the NBO price in effect at the time of order receipt.
				Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
52	NBBO Source	Alphanumeric(1)	С	Values 'D', 'H', or 'S'.
				Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
53	NBBO	Numeric(11)	С	Format: YYYYMMDD
	Matching Engine Lookup Date			Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
54	NBBO	Numeric(15,9)	C	Format: HHMMSS.CCCNNNNNN
	Matching Engine Lookup Time			Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
55	ATS Order	Alphanumeric(40)	С	Values: Any alphanumeric not containing a delimiter.
	Туре			Must be equal to a unique order type identifier provided to FINRA by the ATS.
				Required if the Order Receiving Firm MPID is an ATS, the Issue Symbol ID is a NMS stock.
56	Processing Sequence Number	Alphanumeric(40)	С	Values: Any alphanumeric not containing a delimiter.
57	ADF Quote ID	Alphanumeric(40)	С	Values: Any alphanumeric not containing a delimiter.
				Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock and the Participation Flag is 'A' or 'Y'.
58	End of Record Marker	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line Feed).

Combined Order/Route Report

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#OE#'—identifies an order event record. Case sensitive.
2	Order Event Type Code	Alphanumeric (2)	M	'OR'—identifies the order event record type as a combined new/routing order. Case sensitive.
3	Action Type Code	Alphanumeric (1)	M	Values: 'N', 'C', 'D', or 'R', Case sensitive.
4	Firm ROE ID	Alphanumeric (12)	С	Values: Any alphanumeric not containing a delimiter.
5	Correction/ Deletion	Numeric (17)	С	Format: YYYYMMDDHHMMSSCCC
	Timestamp			Required if the Action Type Code is 'C', 'D', or 'R'.
6	Rejected ROE Resubmit Flag	Alphanumeric (1)	С	Value: 'Y'. Case sensitive. Required when the ROE has been rejected by OATS and has
				been corrected for resubmission.
7	Order Receiving Firm MPID	Alphanumeric (4)	С	Case sensitive.
				If populated, must be equal to the Order Receiving Firm MPID in the Header of the FORE.
8	Order Receiving Firm Order	Numeric (17)	M	Format: YYYYMMDDHHMMSSCCC
	Received Date			Date portion must equal the date portion of the Order Received Timestamp (for orders received on or after October 17, 2011).
9	Order Receiving Firm Order ID	Alphanumeric (40)	M	Values: Any alphanumeric not containing a delimiter. Must be unique for the firm within the Order Received Date.
10	Routing Firm MPID	Alphanumeric (9)	С	Case sensitive. Must be a FINRA member MPID for the Order Received
				Timestamp if the Order Origination Code is 'W' and the Member Type Code is 'C', 'E' or 'M'. If the Order Origination Code is 'W' and the Member Type Code is 'N'
				or 'A', must be populated with a Non-FINRA Member identifier. If the Order Origination Code is 'W' and the Member Type Code is 'F' or 'X', must be must be blank or
				contain an identifier of the Foreign firm which is not a valid FINRA MPID or an identifier of US Broker/Dealer. If the
11	Routed Order	Alphanumeric (40)	С	Order Origination Code is 'F', this field must be blank. Values: Any alphanumeric not containing a delimiter or
11	ID	Arphanumenc (40)		leading zeroes.
				Required when the Order Origination Code is 'W', the Received Method Code is 'E'.
12	Order Received Timestamp	Numeric (17)	M	Format: YYYYMMDDHHMMSSCCC
13	Received Method Code	Alphanumeric (1)	M	Values: 'E' or 'N'. Case sensitive.
14	Issue Symbol ID	Alphanumeric (14)	M	Case sensitive.
				Issue symbol for a valid OATS reportable security, for the Order Received Date. For exchange listed securities, the symbol format must follow the format published by the
1.5	D/C-11 C 1	A1-1 (2)	M	primary listing market.
15	Buy/Sell Code	Alphanumeric (2)	M	Values: 'B', 'SL', 'SS', or 'SX'. Case sensitive.

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
16	Limit Price	Numeric (18,8)	С	If entered, must be greater than 0. If entered, a Time in
				Force Code must be provided.
17	Customer Instruction Flag	Alphanumeric (1)	С	Values: 'Y' or 'N', Case sensitive.
				For Non-ECNs, must be provided if a Limit Price is populated.
18	Stop Price	Numeric (18,8)	C	If entered, a Time in Force Code must be provided.
19	Time in Force Code	Alphanumeric (3)	С	Values: 'DAY', 'GTD', 'GTT', 'GTC', or 'GTM'. A blank is interpreted by OATS as a market order. Case sensitive.
20	Expiration Date	Date (8)	С	Format: YYYYMMDD
				Required if the Time in Force is 'GTD', 'DAY', or 'GTT'. If the Time in Force Code is 'DAY' the Expiration Date must be equal to Order Received Date or one trading day greater than the Order Received Date.
				If the Time in Force code is 'GTM' the expiration date will be derived by OATS as the last calendar day of the current month.
				Must be blank if the Time in Force is <blank>, 'GTM', or 'GTC'.</blank>
21	Expiration Time	Numeric (9)	С	Format: HHMMSSCCC
				Required if the Time in Force is 'GTT'. Must be blank if the Time in Force is blank>, 'DAY', 'GTM', 'GTC', or 'GTD'.
22	Do Not Reduce/Do Not Increase Code	Alphanumeric (3)	С	Values: 'DNR', 'DNI', or 'DIR', Case sensitive.
23	Special Handling Code 1	Alphanumeric (3)	С	Values: 'ADD', 'ALO', 'AOB', 'AON', 'CND', 'CNH', 'CPR', 'CSH', 'DIR', 'DLO', 'E.W', 'FBA', 'F0', 'F3', 'F6', 'F7', 'F8', 'F9', 'FA', 'FB', 'Fb', 'FC', 'Fc', 'FD', 'Fd', 'Fe', 'FH', 'FI', 'FJ', 'FK', 'FL', 'FM', 'FN', 'FO', 'FOK', 'FP', 'FQ', 'FR', 'FS', 'FT', 'FW', 'FX', 'FY', 'FZ', 'G', 'IDX', 'IO', 'IOC', 'ISO', 'LOC', 'LOO', 'MAC', 'MAO', 'MOB', 'MOC', 'MOO', 'MPT', 'MQT', 'MTL', 'ND', 'NH', 'OPO', 'OPT', 'OVD', 'PEG', 'RSV', 'S.W', 'SCL', 'SLD', 'SLR', 'SLQ', 'SOQ', 'STP', 'TAI', 'TMO', 'TS', 'WRK'. Case sensitive.
				If the ATS Display Indicator is populated, only the following list of Special Handling Codes is permitted: 'ALO', 'AON', 'CND', 'CPR', 'DIR', 'FOK', 'IOC', 'ISO', 'MQT', 'NH', 'OPO', 'RSV', 'SLD', 'STP', 'TAI', 'F6'.
24	Special Handling Code 2	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
25	Special Handling Code 3	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
26	Special Handling Code 4	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
27	Special Handling Code 5	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
28	Trading Session Code	Alphanumeric (12)	M	Values: 'FOR', 'PRE', 'PREREG', 'REG', 'REGPOST', 'POST', 'PREPOST', or 'ALL'.
29	Receiving Department ID	Alphanumeric (12)	С	Values: 'A', 'ATS', 'MA', 'T', or 'O'. Must be provided if the Order Origination Code is 'W' or if the Order Origination Code is 'F' and the Account Type Code is 'A', 'E', or 'I'. If the Order Origination Code is 'F' and the Account Type Code is 'C', the Receiving Department ID or the Originating Department ID must be populated. If the Order Origination Code is 'F', then the Receiving Department ID cannot be 'MA'.
30	Originating Department ID	Alphanumeric (12)	С	Values: 'A', 'ATS', 'T', or 'O'. Must be blank if the Order Origination Code is 'W'. Must be provided if the Order Origination Code is 'F' and the Account Type Code is 'O', 'P' or 'X'. If the Order Origination Code is 'F' and the Account Type Code is 'C', the Receiving Department ID or the Originating Department ID must be populated.
31	Account Type Code	Alphanumeric (1)	M	Values: 'A', 'C', 'E', 'I', 'O', 'P', 'U', 'X'. Case sensitive.
32	Program Trading Code	Alphanumeric (1)	M	Values: 'Y', 'N', or 'X'. Case sensitive. ECNs must populate this field with a value of 'X'. Non-ECNs that populate the Account Type Code with 'P' should not populate this field with 'X'.
33	Arbitrage Code	Alphanumeric (1)	M	Values: 'Y', 'N', 'X'. Case sensitive. If the Order Origination Code is 'F' this field must not be equal to 'X'.
34	Sent To Routed Order ID	Alphanumeric (40)	С	Values: Any alphanumeric not containing a delimiter or leading zeroes. Required if the Routing Method Code is 'E', 'F' or 'S'. Must be unique for the MPID, Order Sent Date, Connection ID and Sent to MPID (if routed to another member or Reportable Non-Member) or Destination Code and Exchange Participant ID (if routed to a national securities exchange), except in instances when the route has a special routing condition.

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
35	Sent to Firm MPID	Alphanumeric (9)	С	Case sensitive.
				Required if the Destination Code is 'M', 'E', 'N' or 'A'. Optional if the order was routed to a national securities exchange or to a foreign firm. When populated, must be a valid firm identifier for the Order Sent Timestamp. If routed to a FINRA member, must be populated with a FINRA MPID. If routed to a Reportable Non-Member, must be populated with a Reportable Non-Member identifier. If routed to a Foreign BD, may be blank; must not be populated with a FINRA member MPID or a Reportable Non-Member identifier.
36	Order Sent Timestamp	Numeric (17)	M	Format: YYYYMMDDHHMMSSCCC
37	Routed Shares Quantity	Numeric (11)	M	Values: Any integer greater than zero. A fractional share order of less than one (1) share must be rounded up to one (1).
				The number of shares routed. If the order was bunched, this would be the total number of bunched shares routed.
38	Routing Method Code	Alphanumeric (1)	M	Values: 'E', 'F', 'N', or 'S'. Case sensitive.
39	Special Routing Condition	Alphanumeric (1)	С	Values: 'X', 'Y' or blank. Case sensitive. Required for orders when the identified order is part of a
				bunched order or represents a modification to an order previously routed to a national securities change that includes duplicated Routed Order ID.
				The Special Routing Condition of 'X' can only be used when routing to a national securities exchange.
40	Member Type Code	Alphanumeric (1)	M	Values: 'A', 'C', 'E', 'M', 'N', 'F' or 'X'. Case sensitive.
41	Destination Code	Alphanumeric (2)	M	Values: 'A', 'E', 'M', 'N', 'F', 'X', 'OA', 'OB', 'OC', 'OE', 'OH', 'OI', 'OJ', 'OM', 'OP', 'OQ', 'OT', 'OX', 'OZ', 'XA', XB', 'XC', 'XF', 'XI', 'XJ', 'XK', 'XM', 'XN', 'XO', 'XP', 'XQ', 'XT', 'XV', 'XW', 'XX', 'XY', or 'XZ'. Case sensitive.
42	ATS Display Indicator	Alphanumeric (1)	С	Value: 'S', 'Y', 'N' or blank. Case sensitive.
				Required if the Order Receiving Firm MPID is an ECN. Required if the Order Receiving Firm MPID is an ATS and the Issue Symbol ID is a NMS stock.
43	Order Cancel Timestamp	Numeric (17)	С	Format: YYYYMMDDHHMMSSCCC Required for orders fully cancelled on the same day the order
44	Cancelled by	Alphanumeric (1)	С	was received. Values: 'C' or 'F'. Case sensitive.
	Flag			Required for orders fully cancelled on the same day the order was received.

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
45	Shares Quantity	Numeric (11)	M	Values: Any integer greater than zero. A fractional share order of less than one (1) share must be rounded up to one (1).
				For reserved size orders, must be the sum of displayed size and reserved size.
46	Information Barrier ID	Alphanumeric (12)	С	Value: Any alphanumeric not containing a delimiter.
47	Desk Received Timestamp	Numeric (17)	С	Format: YYYYMMDDHHMMSSCCC
				Required for orders that are fully transmitted to an internal desk or department the same day the firm received the order.
48	Desk Type Code	Alphanumeric (12)	С	Values: 'A', 'AR', 'B', 'C', 'CR', 'D', 'EC', 'IN', 'IS', 'O', 'PF', 'PR', 'PT', 'S', 'SW', 'T', or 'TR'.
				Required for orders that are fully transmitted to an internal desk or department the same day the firm received the order.
49	Desk Special Handling Code	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
50	Desk Special Handling Code 2	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
51	Desk Special Handling Code 3	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
52	Desk Special Handling Code	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
53	Desk Special Handling Code 5	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
54	TMO	Numeric (17)	С	Format: YYYYMMDDHHMMSSCCC
	Timestamp			Required for orders with any Special Handling Code of 'TMO'.
55	Routed Order Type Indicator	Alphanumeric (1)	M	Values: 'L' or 'M'. Case sensitive.
56	Route Price	Numeric(18,8)	С	Required if the Routed Order Type Indicator is 'L'. If entered, must be greater than 0.
57	ISO Indicator	Alphanumeric (1)	С	Value: 'Y' or 'T'. Case sensitive.
				Required if the order was sent as an Intermarket Sweep Order or Trade-at Intermarket Sweep Order.
58	Short Sale Exempt	Alphanumeric (1)	С	Value: 'Y'. Case sensitive.
	Indicator			Required if the order may be marked "short exempt" consistent with SEC Rule 201.
59	Order Origination Code	Alphanumeric (1)	M	Values: 'F' or 'W'.

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
60	Exchange	Alphanumeric (8)	С	Case sensitive.
	Participant ID			
61	Connection ID	Alphanumeric (12)	С	Required for orders routed to a national securities exchange. Value: Any alphanumeric not containing a delimiter. Case
01	Connection 12	inpitaliametre (12)		sensitive.
62	Rejected ROE	Numeric (15)	С	Must be blank when Rejected ROE Resubmit Flag is blank.
63	ID ROE Memo	A lmh amamani a(40)	С	Valvas Anysalmhanymania not containing a delimiten
0.3	ROE Memo	Alphanumeric(40)	C	Value: Any alphanumeric not containing a delimiter.
Fields	64-66 are only ap	plicable to Tick Size P	ilot Tr	ading Centers in a Tick Pilot Symbol. Fields 64-75 are
applic	able only to ATSs	in NMS stocks. If a fi		not a Tick Size Pilot Trading Center and is not an ATS, the
	ring fields are not		_	T
64	Participation Flag	Alphanumeric (1)	C	Values: 'T', 'A', Y', or blank.
	Tag			Required when either of the following conditions are true:
				Order Receiving Firm is a Tick Pilot Participant
				Order Receiving Firm is an ATS, is an ADF Trading
				Center and the Issue Symbol ID is a NMS stock.
65	Display Size	Numeric (11)	С	Values: Any integer greater than zero. A fractional share
				order of less than 1 share must be rounded up to 1.
				If the ender is hidden movet be get to 0
				If the order is hidden, must be set to 0.
				Required if the Participation Flag is 'A'. Required if the ATS
				Display Indicator is 'S' or 'Y and the Issue Symbol ID is a
				NMS stock.
66	Routable Flag	Alphanumeric (1)	C	Values: 'Y' or 'N'. Case sensitive.
				Required if the Participation Flag is populated or if the ATS
				Display Indicator is populated.
67	Display Price	Numeric(18,8)	С	Values: Any integer greater than zero.
				, , ,
				If the order is hidden, must be blank.
				Required if the ATS Display Indicator is 'S' or 'Y', the Issue
				Symbol ID is a NMS stock, and the Display Size > 0.
68	NBBO Bid	Numeric(18,8)	С	Values: Any integer greater than zero.
	Price			
				Must be populated with the NBB price in effect at the time of
				order receipt.
				Required if the ATS Display Indicator is populated and the
				Issue Symbol ID is a NMS stock.
69	NBBO Ask	Numeric(18,8)	С	Values: Any integer greater than zero.
	Price			
				Must be populated with the NBO price in effect at the time of
				order receipt.
				Required if the ATS Display Indicator is populated and the
				Issue Symbol ID is a NMS stock.
70	NBBO Source	Alphanumeric(1)	С	Values 'D', 'H', or 'S'.
				D 1104 ATOD: 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
				Required if the ATS Display Indicator is populated and the
				Issue Symbol ID is a NMS stock.

OATS REPORTING TECHNICAL SPECIFICATIONS

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
71	NBBO Matching	Numeric(11)	С	Format : YYYYMMDD
	Engine Lookup Date			Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
72	NBBO Matching Engine Lookup	Numeric(15,9)	С	Format: HHMMSS.CCCNNNNNN Required if the ATS Display Indicator is populated and the
	Time			Issue Symbol ID is a NMS stock.
73	ATS Order Type	Alphanumeric(40)	С	Values: Any alphanumeric not containing a delimiter.
				Must be equal to a unique order type identifier provided to FINRA by the ATS.
				Required if the Order Receiving Firm MPID is an ATS, the Issue Symbol ID is a NMS stock.
74	Processing Sequence Number	Alphanumeric(40)	С	Values: Any alphanumeric not containing a delimiter.
75	ADF Quote ID	Alphanumeric(40)	С	Values: Any alphanumeric not containing a delimiter.
				Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock and the Participation Flag is 'A' or 'Y'.
76	End of Record Marker	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line Feed).

Combined Order/Execution Report

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#OE#' Case sensitive.
2	Order Event Type Code	Alphanumeric (2)	M	'OE' is the value for this report. Case sensitive.
3	Action Type Code	Alphanumeric (1)	M	Values: 'N', 'C', 'D', or 'R'. Case sensitive.
4	Firm ROE ID	Alphanumeric (12)	С	Value: Any alphanumeric not containing a delimiter.
5	Correction/ Deletion Timestamp	Numeric (17)	С	Format: YYYYMMDDHHMMSSCCC Required if the Action Type Code is 'C' 'D' or 'R'.
6	Rejected ROE Resubmit Flag	Alphanumeric (1)	С	Value: 'Y'. Case sensitive. Required when the ROE has been Rejected by OATS and
				has been corrected for resubmission.
7	Order Receiving Firm MPID	Alphanumeric (4)	С	Case sensitive.
				If populated, must be equal to the Order Receiving Firm MPID in the Header of the FORE.
8	Order Receiving Firm Order Received Date	Numeric (17)	M	Format is YYYYMMDDHHMMSSCCC Date portion must equal the date portion of the Order Received Timestamp (for orders received on or after October 17, 2011).
9	Order Receiving Firm Order ID	Alphanumeric (40)	M	Values: Any alphanumeric not containing a delimiter. Must be unique for the firm within the Order Received Date.
10	Routing Firm MPID	Alphanumeric (9)	С	Case sensitive. Must be a FINRA member MPID for the Order Received Timestamp if the Order Origination Code is 'W' and the Member Type Code is 'C', 'E' or 'M'. If the Order Origination Code is 'W' and the Member Type Code is 'N' or 'A', must be populated with Reportable Non-Member identifier. If the Order Origination Code is 'W' and the Member Type Code is 'F' or 'X', may be blank; must not be populated with a FINRA member MPID or a Reportable Non-Member identifier. If the Order Origination Code is 'F', this field must be blank.
11	Routed Order ID	Alphanumeric (40)	С	Values: Any alphanumeric not containing a delimiter or leading zeroes. Required when the Order Origination Code is 'W', the Received Method Code is 'E'.
12	Order Received Timestamp	Numeric (17)	M	Format: YYYYMMDDHHMMSSCCC
13	Received Method Code	Alphanumeric (1)	M	Values: 'E', or 'N'. Case sensitive.

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
14	Issue Symbol	Alphanumeric (14)	M	Case sensitive.
	ID			Issue symbol for a valid OATS reportable security, for the Order Received Date. For exchange listed securities, the symbol format must follow the format published by the primary listing market.
15	Buy/Sell Code	Alphanumeric (2)	M	Values: 'B', 'SL', 'SS', or 'SX'. Case sensitive.
16	Limit Price	Numeric (18,8)	С	If entered, must be greater than 0. If entered, a Time in Force Code must be provided.
17	Customer Instruction Flag	Alphanumeric (1)	С	Values: 'Y' or 'N'. Case sensitive. For Non-ECNs, must be provided if a Limit Price is
10	Ctom Duico	Numeric (18,8)	С	populated. If entered, a Time in Force Code must be provided.
18	Stop Price Time in Force Code	Alphanumeric (3)	С	Values: 'DAY', 'GTD', 'GTT', 'GTC', or 'GTM'. Case sensitive.
20	Expiration Date	Date (8)	С	A blank is interpreted by OATS as a market order. Format: YYYYMMDD
				Required if the Time in Force is 'GTD', 'DAY', or 'GTT'. If the Time in Force Code is 'DAY' the Expiration Date must be equal to Order Received Date or one trading day greater than the Order Received Date. If the Time in Force code is 'GTM' the expiration date will be derived by OATS as the last calendar day of the current month.
				Must be blank if the Time in Force is <blank>, 'GTM', or 'GTC'.</blank>
21	Expiration Time	Numeric (9)	С	Format: HHMMSSCCC Required if the Time in Force is 'GTT'. Must be blank if the Time in Force is <blank>, 'DAY', 'GTM', 'GTC', or 'GTD'.</blank>
22	Do Not Reduce/Do Not Increase Code	Alphanumeric (3)	С	Values: 'DNR', 'DNI', or 'DIR'. Case sensitive.
23	Special Handling Code 1	Alphanumeric (3)	С	Values: 'ADD', 'ALO', 'AOB', 'AON', 'CND', 'CNH', 'CPR', 'CSH', 'DIR', 'DLO', 'E.W', 'FBA', 'F0', 'F3', 'F6', 'F7', 'F8', 'F9', 'FA', 'FB', 'Fb', 'FC', 'Fc', 'FD', 'Fd', 'Fe', 'FH', 'FI', 'FJ', 'FK', 'FL', 'FM', 'FN', 'FO', 'FOK', 'FP', 'FQ', 'FR', 'FS', 'FT', 'FW', 'FX', 'FY', 'FZ', 'G', 'IDX', 'IO', 'IOC', 'ISO', 'LOC', 'LOO', 'MAC', 'MAO', 'MOB', 'MOC', 'MOO', 'MPT', 'MQT', 'MTL', 'ND', 'NH', 'OPO', 'OPT', 'OVD', 'PEG', 'RSV', 'S.W', 'SCL', 'SLD', 'SLR', 'SLQ', 'SOQ', 'STP', 'TAI', 'TMO', 'TS', 'WRK'. Case sensitive. If the ATS Display Indicator is populated, only the following list of Special Handling Codes is permitted: 'ALO', 'AON', 'CND', 'CPR', 'DIR', 'FOK', 'IOC', 'ISO', 'MQT', 'NH', 'OPO', 'RSV', 'SLD', 'STP', 'TAI', 'F6'.

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
24	Special Handling Code 2	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
25	Special Handling Code 3	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
26	Special Handling Code 4	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
27	Special Handling Code 5	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
28	Trading Session Code	Alphanumeric (12)	M	Values: 'FOR', 'PRE', 'PREREG', 'REG', 'REGPOST', 'POST', 'PREPOST', or 'ALL'.
29	Receiving Department ID	Alphanumeric (12)	С	Values: 'A', 'ATS', 'MA', 'T', or 'O'. Must be provided if the Order Origination Code is 'W' or if the Order Origination Code is 'F' and the Account Type Code is 'A', 'E', or 'I'. If the Order Origination Code is 'F' and the Account Type Code is 'C', the Receiving Department ID or the Originating Department ID must be populated. If the Order Origination Code is 'F', then the Receiving Department ID cannot be 'MA'.
30	Originating Department ID	Alphanumeric (12)	С	Values: 'A', 'ATS', , 'T', or 'O'. Must be blank if the Order Origination Code is 'W'. Must be provided if the Order Origination Code is 'F' and the Account Type Code is 'O', 'P' or 'X'. If the Order Origination Code is 'F' and the Account Type Code is 'C', the Receiving Department ID or the Originating Department ID must be populated.
31	Account Type Code	Alphanumeric (1)	M	Values: 'A', 'C', 'E', 'I', 'O', 'P', 'U', 'X'. Case sensitive.
32	Program Trading Code	Alphanumeric (1)	M	Values: 'Y', 'N', or 'X'. Case sensitive. If the Order Origination Code is 'F' this field must not be equal to 'X'.
33	Arbitrage Code	Alphanumeric (1)	M	Values: 'Y', 'N', 'X'. Case sensitive. If the Order Origination Code is 'F' this field must not be equal to 'X'.
34	Execution Timestamp	Numeric (17)	M	Format: YYYYMMDDHHMMSSCCC
35	OATS Trade ID	Alphanumeric (20)	С	Values: Any alphanumeric not containing a delimiter, spaces, blanks, or leading zeroes. Must be provided when a trade is executed by the member and reported to a FINRA transaction reporting system. Must be unique within the firm within the day except in instances involving an agency cross where one side of the cross is comprised of multiple orders. Each of the orders on the same side of market involved in the single agency cross execution may share the same OATS Trade ID.

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
36	Execution	Numeric (11)	M	Values: Any integer greater than zero. A fractional share
	Quantity			order of less than one (1) share must be rounded up to one (1).
37	Trader Terminal ID	Alphanumeric (12)	M	Values: Any alphanumeric not containing a delimiter.
38	Reporting Exception Code	Alphanumeric (1)	С	Values: 'P', 'M', 'R', 'A', 'T', or 'F'.
	-			Must be provided if the execution is not required to be reported to a FINRA transaction reporting system.
39	Market Center ID	Alphanumeric (2)	С	Values: 'A', 'B', 'C', 'D', 'DN', 'F', 'I', 'J', 'K', 'L', 'M', 'N', 'O', 'P', 'Q', 'V', 'W', 'X', 'Y' or 'Z'. Case sensitive.
40	Member Type Code	Alphanumeric (1)	M	Values: 'A', 'C', 'E', 'M', 'N', 'F' or 'X'. Case sensitive.
41	ATS Display Indicator	Alphanumeric (1)	С	Value: 'S', 'Y', 'N' or blank. Case sensitive.
				Required if the Order Receiving Firm MPID is an ECN. Required if the Order Receiving Firm MPID is an ATS and the Issue Symbol ID is a NMS stock.
42	Execution Price	Numeric (18,8)	M	Must be the same price that is reported to the applicable transaction reporting association for trade reporting purposes.
43	Capacity Code	Alphanumeric (1)	M	Values: 'A', 'P', 'R'. Case sensitive.
				Must equal 'R' if the reporting exception code is 'R'. Must equal 'A' if the reporting exception code is 'A' or 'T'. Must equal 'P' if the reporting exception code is 'P'.
44	Shares Quantity	Numeric (11)	M	Values: Any integer greater than zero. A fractional share order of less than one (1) share must be rounded up to one (1).
				For reserved size orders, must be the sum of displayed size and reserved size.
45	Information Barrier ID	Alphanumeric (12)	С	Value: Any alphanumeric not containing a delimiter.
46	Desk Received Timestamp	Numeric (17)	С	Format: YYYYMMDDHHMMSSCCC
				Required for orders that are fully routed to a desk on the same day the order was received.
47	Desk Type Code	Alphanumeric (12)	С	Values: 'A', 'AR', 'B', 'C', 'CR', 'D', 'EC', 'IN', 'IS', 'O', 'PF', 'PR', 'PT', 'S', 'SW', 'T', or 'TR'.
				Required for orders that are fully transmitted to an internal desk or department the same day the firm received the order.
48	Desk Special Handling Code	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
49	Desk Special Handling Code 2	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
50	Desk Special Handling Code 3	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
51	Desk Special Handling Code 4	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
52	Desk Special Handling Code 5	Alphanumeric (3)	С	Refer to Special Handling Code 1 for list of values.
53	TMO Trigger Timestamp	Numeric (17)	С	Format: YYYYMMDDHHMMSSCCC Required for orders with any Special Handling Code of
54	Negotiated Trade Flag	Alphanumeric (1)	С	'TMO'. Value: 'Y'. Case sensitive. Must be populated when an order is the result of a negotiated trade between two members where both members, for OATS purposes, are considered to have executed the trade and must submit an Execution Report to OATS. The flag should be set to Y when a member is required to report a new order and execution as the result of an
55	Order Origination Code	Alphanumeric (1)	M	incoming negotiation that results in a trade. Values: 'F' or 'W'.
56	Rejected ROE	Numeric (15)	С	Must be blank when Rejected ROE Resubmit Flag is blank.
57	ROE Memo	Alphanumeric(40)	С	Value: Any alphanumeric not containing a delimiter.
applic		in NMS stocks. If a f		ading Centers in a Tick Pilot Symbol. Fields 58-75 are not a Tick Size Pilot Trading Center and is not an ATS, Values: 'T', 'A', Y', or blank.
				Required when either of the following conditions are true:
				 Required when either of the following conditions are true: Order Receiving Firm is a Tick Pilot Participant Order Receiving Firm is an ATS, is an ADF Trading Center and the Issue Symbol ID is a NMS stock.
59	Display Size	Numeric (11)	С	 Order Receiving Firm is a Tick Pilot Participant Order Receiving Firm is an ATS, is an ADF Trading
59 60	Display Size Routable Flag	Numeric (11) Alphanumeric (1)	C	 Order Receiving Firm is a Tick Pilot Participant Order Receiving Firm is an ATS, is an ADF Trading Center and the Issue Symbol ID is a NMS stock. Values: Any integer greater than zero. A fractional share order of less than 1 share must be rounded up to 1. If the order is hidden, must be set to 0. Required if the Participation Flag is 'A'. Required if the ATS Display Indicator is 'S' or 'Y' and the Issue Symbol

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
62	Display Price	Numeric(18,8)	С	Values: Any integer greater than zero.
				If the order is hidden, must be blank.
				Required if the ATS Display Indicator is 'S' or 'Y', the Issue Symbol ID is a NMS stock, and the Display Size > 0.
63	NBBO Bid	Numeric(18,8)	C	Values: Any integer greater than zero.
	Price			Must be populated with the NBB price in effect at the time of order receipt.
				Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
64	NBBO Ask	Numeric(18,8)	C	Values: Any integer greater than zero.
	Price			Must be populated with the NBO price in effect at the time of order receipt.
				Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
65	NBBO Source	Alphanumeric(1)	C	Values 'D', 'H', or 'S'.
				Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
66	NBBO	Numeric(11)	С	Format: YYYYMMDD
	Matching			
	Engine Lookup			Required if the ATS Display Indicator is populated and the
67	Date NBBO	Numaria (15.0)	С	Issue Symbol ID is a NMS stock. Format: HHMMSS.CCCNNNNNN
07	Matching	Numeric(15,9)	C	FORMAL: HAIVINISS.CCCINININININ
	Engine Lookup			Required if the ATS Display Indicator is populated and the
	Time			Issue Symbol ID is a NMS stock.
68	NBBO Bid Price at	Numeric(18,8)	С	Values: Any integer greater than zero.
	Execution			Must be populated with the NBB price in effect immediately prior to order execution.
				Required if the ATS Display Indicator is populated and the
				Issue Symbol ID is a NMS stock.
69	NBBO Ask	Numeric(18,8)	С	Values: Any integer greater than zero.
	Price at			M (1 1 1 1 1 1 1 1 NPO 1 1 1 00 1
	Execution			Must be populated with the NBO price in effect immediately prior to order execution.
				miniculately prior to order execution.
				Required if the ATS Display Indicator is populated and the
				Issue Symbol ID is a NMS stock.
70	NBBO Source at Execution	Alphanumeric(1)	C	Values 'D', 'H', or 'S'.
	at Execution			Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
71	NBBO	Numeric(11)	С	Format: YYYYMMDD
	Matching			
	Engine Lookup			Required if the ATS Display Indicator is populated and the
	Date at Execution			Issue Symbol ID is a NMS stock.
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OATS REPORTING TECHNICAL SPECIFICATIONS

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
72	NBBO Matching Engine Lookup Time at	Numeric(15,9)	С	Format : HHMMSS.CCCNNNNNN Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock.
	Execution			issue Symbol 15 is a trivis stock.
73	ATS Order Type	Alphanumeric(40)	С	Values: Any alphanumeric not containing a delimiter.
				Must be equal to a unique order type identifier provided to FINRA by the ATS.
				Required if the Order Receiving Firm MPID is an ATS, the Issue Symbol ID is a NMS stock.
74	Processing Sequence Number	Alphanumeric(40)	С	Values: Any alphanumeric not containing a delimiter.
75	ADF Quote ID	Alphanumeric(40)	С	Values: Any alphanumeric not containing a delimiter.
				Required if the ATS Display Indicator is populated and the Issue Symbol ID is a NMS stock and the Participation Flag is 'A' or 'Y'.
76	End of Record Marker	(1 or 2)	M	Values: LF (Line Feed), or CR/LF (Carriage Return/Line Feed)

Order Display Modification Report

The Order Display Modification Report is applicable only to ATSs that display orders outside of the ATS in NMS stocks.

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#OE#'—identifies an order event record. Case sensitive.
2	Order Event	Alphanumeric (2)	M	'OM'—identifies the order event record type as a quote
	Type Code			modification report. Case sensitive.
3	Action Type Code	Alphanumeric (1)	M	Values: 'N', 'C', 'D', or 'R', Case sensitive.
4	Firm ROE ID	Alphanumeric (12)	С	Values: Any alphanumeric not containing a delimiter.
5	Correction/ Deletion	Numeric (17)	С	Format: YYYYMMDDHHMMSSCCC
	Timestamp			Required if the Action Type Code is 'C', 'D', or 'R'.
6	Rejected ROE Resubmit Flag	Alphanumeric (1)	С	Value is: 'Y', Case sensitive.
				Required when the ROE has been Rejected by OATS and has been corrected for resubmission.
7	Order Receiving Firm MPID	Alphanumeric (4)	С	Case sensitive.
				If populated, must be equal to the Order Receiving Firm MPID in the Header of the FORE.
8	Order Receiving Firm Order Received Date	Numeric (17)	M	Format: YYYYMMDDHHMMSSCCC
9	Order Receiving Firm Order ID	Alphanumeric (40)	M	Values: Any alphanumeric not containing a delimiter.
10	Issue Symbol ID	Alphanumeric (14)	M	Case sensitive.
				Issue symbol for a valid OATS reportable security, for the Order Received Date. For exchange listed securities, the symbol format must follow the format published by the primary listing market.
11	Order Display Modification Timestamp	Numeric (17)	M	Format: YYYYMMDDHHMMSSCCC
12	Display Size	Numeric (11)	M	Values: Any integer greater than zero. A fractional share order of less than 1 share must be rounded up to 1.
13	Display Price	Numeric(18,8)	M	Values: Any integer greater than zero. Required if the Display Size > 0.
14	ADF Quote ID	Alphanumeric(40)	С	Values: Any alphanumeric not containing a delimiter.
				Required if the Order Receiving Firm MPID is an ADF Trading Center.
15	Rejected ROE ID	Numeric (15)	С	Must be blank when Rejected ROE Resubmit Flag is blank.
16	ROE Memo	Alphanumeric(40)	С	Value: Any alphanumeric not containing a delimiter.
17	End of Record Marker	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line Feed).

FORE Status Report

The FORE Status report is supplied by OATS to the data sending location following validation of the FORE. If a FORE file contains more than one FORE (header/trailer combination), each FORE will be treated as a separate submission and will receive its own FORE Status report. FORE Status reports use the same delimiter as the original FORE and consist of a header record, zero or more exception reasons, and then a trailer to indicate end of submission. The format of each file component follows.

FORE Status Header

Seq. #	Name	Data Type (Length)	M/C	Permissible Values and Instructions
1	Record Type Code	Alphanumeric (4)	M	'#ST#'—identifies a header record for a Status Report.
2	FORE Memo	Alphanumeric (16)	C	Values: Any alphanumeric not containing a delimiter.
3	Generation Date	Date (8)	M	Date of file generation. Format: YYYYMMDD
4	Firm FORE ID	Alphanumeric (20)	M	An identifier, unique for an OSO for a Generation Date, for each FORE submission.
5	FORE Status	Alphanumeric (1)	M	Values: 'A' or 'R',
6	Record Count	Numeric (8)	С	Total number of order entry records in the file as reported by the OSO. NOTE: This does not include the header and the trailer.
7	Calculated Record Count	Numeric (8)	M	Total number of order entry records in the file as calculated by OATS. NOTE: This does not include the header and the trailer.
8	FORE Received Timestamp	Numeric (14)	M	The date and time that the FORE was received by OATS.
9	FORE Validated Timestamp	Numeric (14)	M	The date and time that the FORE validation was performed by OATS.
10	Reporting OSO ID	Alphanumeric (8)	С	The OSO ID assigned to the third party that is authorized to report on a firm's behalf, in addition to the Transmitting OSO.
11	User ID	Alphanumeric (20)	M	The User ID assigned to identify the user in OATS.
12	Password Life	Numeric (4)	С	Remaining life in the password used by this User ID. Note: this will only be supplied when the value is less than 10 days.
13	Order Receiving Firm MPID	Alphanumeric (4)	M	The Receiving Firm MPID for which the ROEs in the FORE were reported.
14	End of Record Marker	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line Feed).

Status Exception Record

Seq.	Name	Data Type (Length)	M	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#SE#' —identifies a status event record.
	Code			
2	Exception Type	Alphanumeric (1)	M	Values: 'E' or 'W'.
	Code			
3	Exception Code	Numeric (4)	M	Specifies the exception that occurred.
4	Exception Code	Alphanumeric (80)	M	Text description of the exception.
	Description			
5	End of Record	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line
	Marker			Feed).

Status Trailer Record

Seq.	Name	Data Type (Length)	M	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#SR#' —identifies a status trailer record.
2	End of Record	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line
	Marker			Feed).

ROE Rejections File

ROE rejection information may be retrieved via FTP, SFTP, IFT, or downloaded via the web. Once Syntax and Semantics processing is complete for a FORE, rejections are available to users to view and download via the web. In addition, a rejection file for each FORE transmitted via FTP, SFTP or IFT will be created, including FOREs with zero rejections, and will be named as follows:

Syntax_<FirmFOREID>_<FOREGenerationDate>_<OATSProcessingDate>-<Sequence#>.reject

Example: Syntax_FORE12345_20110310_20110311-1.reject

Once Context processing is complete, rejections are available to users to view and download via the web. In addition, a rejection file for all context rejections for ROEs originally transmitted via FTP, SFTP or IFT will be created, including a rejection file with zero rejections, and will be named as follows:

Context_<OATSProcessingDate>-<Sequence#>.reject

Example: Context_20110311-1.reject

ROE rejection files with an original submission method of FTP, SFTP, or IFT are available ONLY to the OSO that originally submitted the ROE. OSOs must designate a recipient to receive rejections. ROE rejections are available via the web to all firms, Transmitting OSOs and Reporting OSOs.

Each rejection record can contain up to 5 rejection reasons. If 6 or more rejection reasons exist for a single FORE, the rejection reasons will continue in the next record; for example, 15 rejection reasons would result in 3 records. (NOTE: A list of all possible rejection reasons and their descriptions is available in Appendix B, Error Messages.)

The rejection file maximum size is 25MB. If a rejection file maximum size is exceeded, then another rejection file will be created with the same name and incremented sequence number. Rejection files are comma-delimited and consist of a header record, zero or more rejection description records, and a trailer to indicate the end of the file. Rejection description records contain the numeric reason for the rejection and the original content of the ROE. OATS will auto-populate the Rejected ROE Resubmit Flag with 'Y' and will auto-populate the Rejected ROE ID with a unique identifier which should be sent back to OATS when the ROE is repaired. The Rejected ROE ID will be used to reconcile rejections and repairs, therefore the value of the Rejected ROE ID must be equal to the value which was auto-populated by OATS. The format of each file component follows.

ROE Rejection Header

Seq.#	Name	Data Type (Length)	M	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#RH#'—identifies a header record for the ROE Rejections
	Code			file.
2	Reserved for	Alphanumeric (16)	C	
	Future Use			
3	Generation Date	Date (8)	M	Date of file generation. Format: YYYYMMDD
4	OSO ID	Alphanumeric (8)	M	The OSO ID assigned to the OSO by OATS.
5	Sequence	Numeric (4)	M	Sequence number of the files generated for the Generation
	Number			Date.
6	Last File	Alphanumeric (1)	M	Indication of the last file in the FORE file for the

Seq. #	Name	Data Type (Length)	M	Permissible Values and Instructions
				Generation Date; 'Y' (indicates last file), 'N' (indicates not
				last file).
7	End of Record	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line
	Marker			Feed).

ROE Rejection Description Record

Seq.	Name	Data Type (Length)	M/C	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#RD#'—identifies a rejected ROE description record.
	Code			
2	Reason 1	Numeric (4)	M	Numeric error number indicating reason for rejection.
3	Reason 2	Numeric (4)	C	Numeric error number indicating reason for rejection.
4	Reason 3	Numeric (4)	C	Numeric error number indicating reason for rejection.
5	Reason 4	Numeric (4)	С	Numeric error number indicating reason for rejection.
6	Reason 5	Numeric (4)	С	Numeric error number indicating reason for rejection.
7	Continuation	Alphanumeric (1)	M	Indicates that this description record in the continuation of a
				previous description record; 'N' indicates not a
				continuation, 'Y' indicates a continuation.
8	Firm FORE ID	Alphanumeric (20)	M	FORE ID from the originally submitted FORE.
9	Rejection Text	Alphanumeric (350)	M	Text of the originally submitted ROE (delimiters changed to
		_		commas if required). The Rejected ROE Resubmit Flag
				will be set to 'Y' and the Rejected ROE ID will be
				populated with an OATS assigned identifier.
10	End of Record	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line
	Marker			Feed).

ROE Rejection Trailer Record

Seq.	Name	Data Type (Length)	M	Permissible Values and Instructions
1	• 1	Alphanumeric (4)	M	'#RT#'—identifies a trailer record for Rejected ROEs.
	Code			
2	Record Count	Numeric (8)	M	Total number of rejection description records in the file.
				NOTE: This does not include the header and trailer.
3	End of Record	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line
	Marker			Feed).

Unmatched Execution Reports

Match eligible Execution or Combined Order/Execution reports that did not link to trades reported to a FINRA transaction reporting facility may be retrieved via FTP, SFTP, IFT and the OATS Web Interface within two business days of the processing date of the original FORE.

For FTP, SFTP, or IFT files, if there are no unmatched executions on a given day for an OSO, an unmatched execution file will be generated, but will consist only of a header and trailer. This "empty" file may be retrieved via FTP, SFTP, or IFT but may not be viewed or downloaded via the Web. Each unmatched record will contain one unmatched reason.

Each Unmatched Execution Report file may contain a maximum of 10,000 ROE records. If there are more than 10,000 Unmatched Execution Report records, they may be downloaded from the Web in groups of 10,000 or less. ROEs in Unmatched Execution Report files are sorted first by Order Receiving Firm MPID, and then by OATS Trade ID.

The Unmatched Execution Report file is comma-delimited and includes a header, one or more Unmatched Execution Report description records, and a trailer. The format of each file component follows.

Unmatched Execution Report File Header

Seq. #	Name	Data Type (Length)	M	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#UH#'—identifies a header record for Unmatched
	Code			Execution ROEs.
2	Reserved for	Alphanumeric (16)	C	
	Future Use			
3	Generation Date	Date (8)	M	Date of file generation. Format: YYYYMMDD
4	OSO ID	Alphanumeric (8)	M	The OSO ID assigned to the OSO by OATS.
5	Sequence	Numeric (4)	M	Sequence number of the files generated for the generation
	Number			date.
6	Last File	Alphanumeric (1)	M	Indication of the last file for the generation date. (Y
				indicates last file, N indicates not last file)
7	End of Record	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line
	Marker			Feed).

Unmatched Execution Report Description Record

Seq. #	Name	Data Type (Length)	Permissible Values and Instructions
1	Record Type Code	Alphanumeric (4)	'#UD#'—identifies an Unmatched Execution ROE
			description record.
2	Unmatched Reason	Numeric (4)	Unmatched reason identifier.
3	Firm FORE ID	Alphanumeric (20)	FORE ID of original submitted FORE.
4	Order Receiving Firm MPID	Alphanumeric (4)	Data provided by firm.
5	OATS Trade ID	Alphanumeric (20)	Data provided by firm.
6	Issue Symbol ID	Alphanumeric (14)	Data provided by firm.
7	Execution Timestamp	Numeric (17)	Data provided by firm.
8	Execution Quantity	Numeric (11)	Data provided by firm.
9	Firm ROE ID	Alphanumeric (12)	Data provided by firm.
10	Order Receiving Firm Order ID	Alphanumeric (40)	Data provided by firm.
11	Order Event Type Code	Alphanumeric (2)	Data provided by firm.

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Seq.#	Name	Data Type (Length)	Permissible Values and Instructions
12	Action Type Code	Alphanumeric (1)	Data provided by firm.
13	Correction/ Deletion	Numeric (17)	Data provided by firm.
	Timestamp		
14	Rejected ROE	Alphanumeric (1)	Data provided by firm.
	Resubmit Flag		
15	Order Receiving Firm	Numeric (17)	Data provided by firm.
	Order Received Date		
16	Trader Terminal ID	Alphanumeric (12)	Data provided by firm.
17	Reporting Exception	Alphanumeric (1)	Data provided by firm.
	Code		
18	Execution Type	Alphanumeric (1)	Data provided by firm.
	Indicator		
19	Leaves Quantity	Numeric (11)	Data provided by firm.
20	Market Center ID	Alphanumeric (2)	Data provided by firm.
21	Execution Price	Numeric (18,8)	Data provided by firm.
22	Capacity Code	Alphanumeric (1)	Data provided by firm.
23	End of Record	(1 or 2)	Values: LF (Line Feed) or CR/LF (Carriage Return/Line
	Marker		Feed).

Unmatched Execution Report Trailer Record

Seq.#	Name	Data Type (Length)	M	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#UT#'—identifies a trailer record for Unmatched
	Code			Execution ROEs.
2	Record Count	Numeric (8)		Total number of unmatched execution description records in the file. NOTE: This does not include the header and trailer.
3	End of Record Marker	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line Feed).

Unmatched Exchange Route Reports

Match eligible Route and Combined Order/Route Reports that did not link to an order submitted to a national securities exchange may be retrieved via FTP, SFTP, IFT and the OATS Web Interface within two business days of the processing date of the original FORE.

For FTP, SFTP, or IFT files, if there are no unmatched exchange routes on a given day for an OSO, an unmatched Exchange route file will be generated, but will consist only of a header and trailer. This "empty" file may be retrieved via FTP, SFTP, or IFT but may not be viewed or downloaded via the Web. Each unmatched record will contain one unmatched reason.

Each Unmatched Exchange Route Report file may contain a maximum of 10,000 ROE records. If there are more than 10,000 Unmatched Exchange Route Report records, they may be downloaded from the Web in groups of 10,000 or less. ROEs in Unmatched Exchange Route Report files are sorted first by Order Receiving Firm MPID, and then by Routed Order ID.

The Unmatched Exchange Route Report file is comma-delimited and includes a header, one or more Unmatched Exchange Route Report description records, and a trailer. The format of each file component follows.

Unmatched Exchange Route Report File Header

Seq.#	Name	Data Type (Length)	M	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#EH#'—identifies a header record for Unmatched Route
	Code			ROEs.
2	Reserved for	Alphanumeric (16)	C	
	Future Use			
3	Generation Date	Date (8)	M	Date of file generation. Format: YYYYMMDD
4	OSO ID	Alphanumeric (8)	M	The OSO ID assigned to the OSO by OATS.
5	Sequence	Numeric (4)	M	Sequence number of the files generated for the generation
	Number			date.
6	Last File	Alphanumeric (1)	M	Indication of the last file for the generation date. (Y
				indicates last file, N indicates not last file)
7	End of Record	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line
	Marker			Feed).

Unmatched Exchange Route Report Description Record

Seq. #	Name	Data Type (Length)	Permissible Values and Instructions
1	Record Type Code	Alphanumeric (4)	'#ED#'—identifies an Unmatched Route ROE description
			record.
2	Unmatched Reason	Numeric (4)	Unmatched reason identifier.
3	Firm FORE ID	Alphanumeric (20)	FORE ID of original submitted FORE.
4	Order Receiving Firm MPID	Alphanumeric (4)	Data provided by firm.
5	Routed Order ID	Alphanumeric (40)	Data provided by firm.
6	Issue Symbol ID	Alphanumeric (14)	Data provided by firm.
7	Order Sent	Numeric (17)	Data provided by firm.
	Timestamp		
8	Routed Shares	Numeric (11)	Data provided by firm.
	Quantity		
9	Firm ROE ID	Alphanumeric (12)	Data provided by firm.
10	Order Receiving Firm	Alphanumeric (40)	Data provided by firm.
	Order ID		
11	Order Event Type	Alphanumeric (2)	Data provided by firm.

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Seq.#	Name	Data Type (Length)	Permissible Values and Instructions
	Code		
12	Sent to Firm MPID	Alphanumeric (9)	Data provided by firm.
13	Action Type Code	Alphanumeric (1)	Data provided by firm.
14	Correction/ Deletion Timestamp	Numeric (17)	Data provided by firm.
15	Rejected ROE Resubmit Flag	Alphanumeric (1)	Data provided by firm.
16	Order Receiving Firm Order Received Date	Numeric (17)	Data provided by firm.
17	Routing Method Code	Alphanumeric (1)	Data provided by firm.
18	Special Routing Condition	Alphanumeric (1)	Data provided by firm.
19	Sent To Routed Order ID	Alphanumeric (40)	Data provided by firm
20	Destination Code	Alphanumeric (2)	Data provided by firm.
21	Exchange Participant ID	Alphanumeric (8)	Data provided by firm.
22	Connection ID	Alphanumeric (12)	Data provided by firm
23	End of Record Marker	(1 or 2)	Values: LF (Line Feed) or CR/LF (Carriage Return/Line Feed).

Unmatched Exchange Route Report Trailer Record

Seq.#	Name	Data Type (Length)	M	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#ET#'—identifies a trailer record for Unmatched Route
	Code			ROEs.
2	Record Count	Numeric (8)		Total number of unmatched execution description records in the file. NOTE: This does not include the header and trailer.
3	End of Record Marker	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line Feed).

Unmatched Interfirm Route Report - Orders Routed

Unmatched Interfirm Routes – Orders Routed represent match eligible Route and Combined Order/Route Reports that did not link to a corresponding New, Cancel/Replace, Combined Order/Execution or Combined Order/Route Report. Unmatched Infirm Routes – Orders Routed may be retrieved via FTP, SFTP, IFT and the OATS Web Interface within two business days of the processing date of the original FORE.

For FTP, SFTP, or IFT files, if there are no unmatched Interfirm routes on a given day for an OSO, an unmatched Interfirm route file will be generated, but will consist only of a header and trailer. This "empty" file may be retrieved via FTP, SFTP, or IFT but may not be viewed or downloaded via the Web. Each unmatched record will contain one unmatched reason.

Each Unmatched Interfirm Route Report – Orders Routed file may contain a maximum of 10,000 ROE records. If there are more than 10,000 Unmatched Route or Combined Order/Route Report records, they may be downloaded from the Web in groups of 10,000 or less. ROEs in Unmatched Interfirm Route Report – Orders Routed files are sorted first by Order Receiving Firm MPID, and then by Routed Order ID.

The Unmatched Interfirm Route Report – Orders Routed file is comma-delimited and includes a header, one or more Unmatched Interfirm Route Report description records, and a trailer. The format of each file component follows.

Unmatched Interfirm Route Report – Orders Routed File Header

Seq. #	Name	Data Type (Length)	M	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#OH#'—identifies a header record for Unmatched Route
	Code			ROEs.
2	Reserved for	Alphanumeric (16)	C	
	Future Use			
3	Generation Date	Date (8)	M	Date of file generation. Format: YYYYMMDD
4	OSO ID	Alphanumeric (8)	M	The OSO ID assigned to the OSO by OATS.
5	Sequence	Numeric (4)	M	Sequence number of the files generated for the generation
	Number			date.
6	Last File	Alphanumeric (1)	M	Indication of the last file for the generation date. (Y
				indicates last file, N indicates not last file)
7	End of Record	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line
	Marker			Feed).

Unmatched Interfirm Route Report – Orders Routed Description Record

		-	•
Seq. #	Name	Data Type (Length)	Permissible Values and Instructions
1	Record Type Code	Alphanumeric (4)	'#OD#'—identifies an Unmatched Route ROE description
			record.
2	Unmatched Reason	Numeric (4)	Unmatched reason identifier.
3	Firm FORE ID	Alphanumeric (20)	FORE ID the original submitted FORE.
4	Order Receiving Firm	Alphanumeric (4)	Data provided by firm.
	MPID		
5	Routed Order ID	Alphanumeric (40)	Data provided by firm.
6	Issue Symbol ID	Alphanumeric (14)	Data provided by firm.
7	Order Sent	Numeric (17)	Data provided by firm.
	Timestamp		
8	Routed Shares	Numeric (11)	Data provided by firm.
	Quantity		

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Seq. #	Name	Data Type (Length)	Permissible Values and Instructions
9	Firm ROE ID	Alphanumeric (12)	Data provided by firm.
10	Order Receiving Firm Order ID	Alphanumeric (40)	Data provided by firm.
11	Order Event Type Code	Alphanumeric (2)	Data provided by firm.
12	Sent to Firm MPID	Alphanumeric (9)	Data provided by firm.
13	Action Type Code	Alphanumeric (1)	Data provided by firm.
14	Correction/ Deletion Timestamp	Numeric (17)	Data provided by firm.
15	Rejected ROE Resubmit Flag	Alphanumeric (1)	Data provided by firm.
16	Order Receiving Firm Order Received Date	Numeric (17)	Data provided by firm.
17	Routing Method Code	Alphanumeric (1)	Data provided by firm.
18	Special Routing Condition	Alphanumeric (1)	Data provided by firm.
19	Sent To Routed Order ID	Alphanumeric (40)	Data provided by firm
20	Destination Code	Alphanumeric (2)	Data provided by firm.
21	Connection ID	Alphanumeric (12)	Data provided by firm.
22	End of Record Marker	(1 or 2)	Values: LF (Line Feed) or CR/LF (Carriage Return/Line Feed).

Unmatched Interfirm Route Report – Orders Routed Trailer Record

Seq. #	Name	Data Type (Length)	M	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#OT#'—identifies a trailer record for Unmatched Route
	Code			ROEs.
2	Record Count	Numeric (8)		Total number of unmatched route and combined order/route description records in the file. NOTE: This does not include the header and trailer.
3	End of Record Marker	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line Feed).

Unmatched Interfirm Route Report - Orders Received

Unmatched Interfirm Routes – Orders Received represents match eligible Route and Combined Order/Route Reports that did not link to a corresponding New, Cancel/Replace, Combined Order/Execution or Combined Order/Route Report. Unmatched Infirm Routes – Orders Received identifies firms named on the unmatched Routes as the Sent to MPID. This data may be viewed and downloaded via the OATS Web Interface within two business days of the processing date of the original FORE.

For FTP, SFTP, or IFT files, if there are no unmatched Interfirm routes on a given day for an OSO, an unmatched Interfirm route file will be generated, but will consist only of a header and trailer. This "empty" file may be retrieved via FTP, SFTP, or IFT but may not be viewed or downloaded via the Web. Each unmatched record will contain one unmatched reason.

Each Unmatched Interfirm Route Report – Orders Received file may contain a maximum of 10,000 ROE records. If there are more than 10,000 Unmatched Route or Combined Order/Route Report records, they may be downloaded from the Web in groups of 10,000 or less. ROEs in Unmatched Interfirm Route Report – Orders Received files are sorted first by Order Receiving Firm MPID, and then by Routed Order ID.

The Unmatched Interfirm Route Report – Orders Received file is comma-delimited and includes a header, one or more description records, and a trailer. The format of each file component follows.

Unmatched Interfirm Route Report – Orders Received File Header

Seq. #	Name	Data Type (Length)	M	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#IH#'—identifies a header record for Unmatched Route
	Code			ROEs.
2	Reserved for	Alphanumeric (16)	C	
	Future Use			
3	Generation	Date (8)	M	Date of file generation. Format: YYYYMMDD
	Date			
4	Sequence	Numeric (4)	M	Sequence number of the files generated for the generation
	Number			date.
5	Last File	Alphanumeric (1)	M	Indication of the last file for the generation date. (Y
				indicates last file, N indicates not last file)
6	End of Record	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line
	Marker			Feed).

Unmatched Interfirm Route Report – Orders Received Description Record

Seq. #	Name	Data Type (Length)	Permissible Values and Instructions
1	Record Type Code	Alphanumeric (4)	'#ID#'—identifies an Unmatched Route ROE description
			record.
2	Unmatched Reason	Numeric (4)	Unmatched reason identifier.
3	Order Receiving Firm MPID	Alphanumeric (4)	Data provided by routing firm.
4	Routed Order ID	Alphanumeric (40)	Data provided by routing firm.
5	Issue Symbol ID	Alphanumeric (14)	Data provided by routing firm.
6	Order Sent Timestamp	Numeric (17)	Data provided by routing firm.
7	Routed Shares	Numeric (11)	Data provided by routing firm.

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Seq.#	Name	Data Type (Length)	Permissible Values and Instructions
	Quantity		
8	Sent to Firm MPID	Alphanumeric (9)	Data provided by routing firm.
9	Connection ID	Alphanumeric (12)	Data provided by routing firm.
10	End of Record	(1 or 2)	Values: LF (Line Feed) or CR/LF (Carriage Return/Line
	Marker		Feed).

Unmatched Interfirm Route Report – Orders Received Trailer Record

Seq. #	Name	Data Type (Length)	M	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#IT#'—identifies a trailer record for Unmatched Route
	Code			ROEs.
2	Record Count	Numeric (8)	M	Total number of unmatched route and combined order/route description records in the file. NOTE: This does not include the header and trailer.
3	End of Record Marker	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line Feed).

Unlinked Trade Reports

The OATS Reverse Linkage Process identifies eligible trades reported to a FINRA transaction reporting system where a related OATS Execution or Combined Order/Execution report was not found. A random sample of 1,000 unlinked trade reports for each market center will be available for download via the OATS Web Interface on T+2. The OATS Report entitled "FINRA Guidance on the OATS Reverse Linkage Process" provides additional guidance related to the new OATS reverse linkage process. To view this report, please click on the following link: http://www.finra.org/industry/oats/finra-guidance-oats-reverse-linkage-process

Each unlinked trade report file downloaded via the OATS Web Interface may contain a maximum of 10,000 records. Firms may call the FINRA Help Desk to obtain additional records. The unlinked trade report file is comma-delimited and includes a header, one or more unlinked trade report description records, and a trailer. The format of each file component follows.

Unlinked Trade Report File Header

Seq. #	Name	Data Type (Length)	M	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#TH#'—identifies a header record for unlinked trade
	Code			records.
2	Reserved for	Alphanumeric (16)	C	Values: Any alphanumeric not containing a delimiter.
	Future Use			identifies the current version of the format specification.
3	Generation Date	Date (8)	M	Date of file generation. Format: YYYYMMDD
4	Reporting Side	Alphanumeric (5)	M	MPID of the executing party of the trade.
	Execution			
	MPID			
5	Sequence	Numeric (4)	M	Sequence number of the files generated for the generation
	Number			date.
6	Last File	Alphanumeric (1)	M	Indication of the last file for the generation date. (Y
				indicates last file, N indicates not last file)
7	End of Record	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line
	Marker			Feed).

Unlinked Trade Report Description Record

Seq. #	Name	Data Type (Length)	Permissible Values and Instructions
1	Record Type Code	Alphanumeric (4)	'#TD#'—identifies an unlinked trade report description record.
2	Reporting Executing MPID	Alphanumeric (5)	Data obtained from TRF/ADF/ORF.
3	Contra Executing MPID	Alphanumeric (5)	Data obtained from TRF/ADF/ORF.
4	Issue Symbol	Alphanumeric (14)	Data obtained from TRF/ADF/ORF.
5	Market Class Code	Alphanumeric (6)	Data obtained from TRF/ADF/ORF.
6	Market Center ID	Alphanumeric (1)	Data obtained from TRF/ADF/ORF.
7	Reporting Side OATS Trade ID ²	Alphanumeric (20)	Data obtained from TRF/ADF/ORF.
8	Execution Timestamp	Numeric (17)	Data obtained from TRF/ADF/ORF.
9	Contra Side OATS Trade ID ³	Alphanumeric (20)	Data obtained from TRF/ADF/ORF.
10	Contra Execution Timestamp	Numeric (17)	Data obtained from TRF/ADF/ORF.
11	Media Report Flag	Alphanumeric (1)	Data obtained from TRF/ADF/ORF.
12	Reporting Side Capacity Code	Alphanumeric (1)	Data obtained from TRF/ADF/ORF.
13	Contra Side Capacity Code	Alphanumeric (1)	Data obtained from TRF/ADF/ORF.
14	Execution Quantity	Numeric (12)	Data obtained from TRF/ADF/ORF.
15	Execution Price	Numeric(18,8)	Data obtained from TRF/ADF/ORF.
16	Reporting Side Code	Alphanumeric (1)	Data obtained from TRF/ADF/ORF.
17	Reporting Side Short Code	Alphanumeric (1)	Data obtained from TRF/ADF/ORF.
18	Control Number	Alphanumeric (30)	Data obtained from TRF/ADF/ORF.
19	End of Record Marker	(1 or 2)	Values: LF (Line Feed) or CR/LF (Carriage Return/Line Feed).

Unlinked Trade Report Trailer Record

Seq.#	Name	Data Type (Length)	M	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#TT#'—identifies a trailer record for unlinked trade
	Code			records.
2	Record Count	Numeric (8)		Total number of unlinked trade report description records in the file. NOTE: This does not include the header and trailer.
3	End of Record	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line
	Marker			Feed).

² The OATS Trade ID represents the unique identifier reported by the firm to the TRF/ADF/ORF based on the reporting specifications of the specific facility.

[•] Compliance ID in ORF and ADF

Branch Sequence Number in FINRA/NQ TRF and FINRA/NYSE TRF

³ Same as 2

Unlinked Exchange Orders

The OATS Reverse Linkage Process identifies eligible orders sent to a national securities exchange where a related OATS Route or Combined Order/Route report was not found. A random sample of 1,000 unlinked exchange orders for each market center will be available for download via the OATS Web Interface on T+2. The OATS Report entitled "FINRA Guidance on the OATS Reverse Linkage Process" provides additional guidance related to the new OATS reverse linkage process. To view this report, please click on the following link: http://www.finra.org/industry/oats/finra-guidance-oats-reverse-linkage-process

Each unlinked exchange order file may contain a maximum of 10,000 records. Firms may call the FINRA Help Desk to obtain additional records. The unlinked exchange order files are sorted first by Exchange Participant ID, then by Market Center ID, then by Client Order ID.

The unlinked exchange order file is comma-delimited and includes a header, one or more unlinked exchange order description records, and a trailer. The format of each file component follows.

Unlinked Exchange Order Report File Header

Seq. #	Name	Data Type (Length)	M	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#LH#'—identifies a header record for unlinked Exchange
	Code			Orders.
2	Reserved for	Alphanumeric (16)	C	Values: Any alphanumeric not containing a delimiter.
	Future Use			
3	Generation Date	Date (8)	M	Date of file generation. Format: YYYYMMDD
4	Exchange	Alphanumeric (4)	M	Firm identifier assigned by the exchange.
	Participant ID			
5	Sequence	Numeric (4)	M	Sequence number of the files generated for the generation
	Number			date.
6	Last File	Alphanumeric (1)	M	Indication of the last file for the generation date. (Y
				indicates last file, N indicates not last file)
7	End of Record	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line
	Marker			Feed).

Unlinked Exchange Order Report Description Record

Seq.#	Name	Data Type (Length)	Permissible Values and Instructions
1	Record Type Code	Alphanumeric (4)	'#LD#'—identifies an exchange order description record.
2	Exchange Participant ID	Alphanumeric (4)	Data provided by exchange.
3	Exchange Code	Alphanumeric (2)	Data provided by exchange.
4	Issue Symbol ID	Alphanumeric (14)	Data provided by exchange.
5	Market Class Code	Alphanumeric (6)	Data provided by exchange.
6	Client Order ID ⁴	Alphanumeric (40)	Data provided by exchange.
7	Connection ID ⁵	Alphanumeric (40)	Data provided by exchange.
8	Order Received Timestamp	Numeric (17)	Data provided by exchange.
9	Capacity	Alphanumeric (1)	Data provided by exchange. Exchange order data has been normalized to the following values: P = Principal A = Agency R = Riskless
10	Shares Quantity	Numeric (12)	Data provided by exchange.
11	Price	Numeric(18,8)	Data provided by exchange.
12	Buy/Sell Code	Alphanumeric (1)	Data provided by exchange. Exchange order data has been normalized to the following values: B = Buy S = Sell C = Cross
13	Short Sale Code	Alphanumeric (1)	Data provided by exchange. Exchange order data has been normalized to the following values: S = short sale (not exempt) X = short sale (exempt)
14	End of Record Marker	(1 or 2)	Values: LF (Line Feed) or CR/LF (Carriage Return/Line Feed).

⁴ The Client Order ID represents the unique identifier that is reported as OATS Routed Order ID (Route Report) and Sent to Routed Order ID (Combined Order/Route Report) while routing to an Exchange. Different Exchanges use different identifiers to represent this field.

Client Order ID in BATS BYX, BATS BZX, New York Stock Exchange, NYSE MKT, NYSE Arca, IEX, EDGA and EDGX Exchanges

User Order ID in The NASDAQ Stock Market, NASDAQ OMX BX and NASDAQ OMX PSX

⁵ The Connection ID represents the identifier that is reported as Connection ID in OATS while routing to an Exchange. Different Exchanges use different identifiers to represent this field.

[•] senderSubId in BATS BYX, BATS BZX, EDGA and EDGX Exchanges

SenderCompID vin The NASDAQ Stock Market, IEX, NASDAQ OMX BX, NASDAQ OMX PSX, New York Stock Exchange, NYSE MKT and NYSE Arca.

Unlinked Exchange Order Report Trailer Record

Seq.#	Name	Data Type (Length)	M	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#LT#'—identifies a trailer record for unlinked exchange
	Code			order.
2	Record Count	Numeric (8)		Total number of unlinked exchange order description records in the file. NOTE: This does not include the header and trailer.
3	End of Record Marker	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line Feed).

Unlinked New Order Reports

The OATS Reverse Linkage Process identifies eligible OATS New, Combined Order/Execution, and Combined Order/Route reports where a related OATS Route or Combined Order/Route report was not found. A random sample of 1,000 unlinked new order events for each receiving firm will be available for download via the OATS Web Interface on T+2. The OATS Report entitled "FINRA Guidance on the OATS Reverse Linkage Process" provides additional guidance related to the new OATS reverse linkage process. To view this report, please click on the following link: http://www.finra.org/industry/oats/finra-guidance-oats-reverse-linkage-process

Each unlinked new orders file may contain a maximum of 10,000 records. Firms may call the FINRA Help Desk to obtain additional records. The unlinked new order files are sorted first by Routing Firm MPID, then by Receiving Firm MPID, then by Routed Order ID.

The unlinked new orders file is comma-delimited and includes a header; one or more unlinked new order description records, and a trailer. The format of each file component follows.

Unlinked New Order Reports File Header

Seq. #	Name	Data Type (Length)	M	Permissible Values and Instructions
1	Record Type Code	Alphanumeric (4)	M	'#FH#'—identifies a header record for unlinked New order Reports.
2	Reserved for Future Use	Alphanumeric (16)	С	Values: Any alphanumeric not containing a delimiter.
3	Generation Date	Date (8)	M	Date of file generation. Format: YYYYMMDD
4	Routing Firm MPID	Alphanumeric (4)	M	The Firm MPID assigned to the Firm by OATS.
5	Sequence Number	Numeric (4)	M	Sequence number of the files generated for the generation date.
6	Last File	Alphanumeric (1)	M	Indication of the last file for the generation date. (Y indicates last file, N indicates not last file)
7	End of Record Marker	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line Feed).

Unlinked New Order Report Description Record

Seq. #	Name	Data Type (Length)	Permissible Values and Instructions
1	Record Type Code	Alphanumeric (4)	'#FD#'—identifies an unlinked New Order description
			record.
2	Routing Firm MPID	Alphanumeric (9)	Data provided by receiving firm.
3	Receiving Firm	Alphanumeric (4)	Data provided by receiving firm.
	MPID		
4	Issue Symbol ID	Alphanumeric (14)	Data provided by receiving firm.
5	Routed Order ID	Alphanumeric (40)	Data provided by receiving firm.
6	Order Received	Numeric (17)	Data provided by receiving firm.
	Timestamp		
7	Market Class Code	Alphanumeric (6)	Data provided by receiving firm.
8	Order Shares	Numeric (12)	Data provided by receiving firm.
	Quantity		
9	Buy/Sell Code	Alphanumeric (2)	Data provided by receiving firm.
10	Limit Price	Numeric(18,8)	Data provided by receiving firm.
11	End of Record	(1 or 2)	Values: LF (Line Feed) or CR/LF (Carriage Return/Line
	Marker		Feed).

Unlinked New Order Report Trailer Record

Seq. #	Name	Data Type (Length)	M	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#FT#'—identifies a trailer record for unlinked New order
	Code			reports.
2	Record Count	Numeric (8)		Total number of unlinked New order report description records in the file. NOTE: This does not include the header and trailer.
3	End of Record Marker	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line Feed).

Out of Sequence Events

On a daily basis, OATS provides a summary and list of events where the event timestamp reported on the Route, Desk, Execution or Cancel report is prior to the Order Received timestamp reported on the originating event.

Route – Order sent timestamp reported on the Route report is prior to the order received timestamp reported on the originating event.

Desk – Desk received timestamp reported on the Desk report is prior to the order received timestamp reported on the originating event.

Execution – Execution timestamp reported on the Execution report is prior to the order received timestamp reported on the originating event.

Cancel – Order cancel timestamp reported on the Cancel report is prior to the order received timestamp reported on the originating event.

Cancel/Replace - Order cancel timestamp reported on the Cancel/Replace report is prior to the order received timestamp reported on the originating event.

Out of Sequence information is available to download via the OATS Web Interface.

Out of Sequence Events File Header

Seq. #	Name	Data Type (Length)	M	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#QS#'—identifies a header record for Out of Sequence
	Code			Events.
2	Reserved for	Alphanumeric (16)	С	
	Future Use			
3	Generation	Date (8)	M	Date of file generation. Format: YYYYMMDD
	Date			
4	Sequence	Numeric (4)	M	Sequence number of the files generated for the generation
	Number			date.
5	Last File	Alphanumeric (1)	M	Indication of the last file for the generation date. (Y
				indicates last file, N indicates not last file)
6	End of Record	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line
	Marker			Feed).

Out of Sequence Event Description Record

Seq. #	Name	Data Type (Length)	Permissible Values and Instructions
1	Record Type Code	Alphanumeric (4)	'#QD#'—identifies an Out of Sequence Event.
2	Out of Sequence	Numeric (4)	Out of Sequence reason identifier.
	Reason		
3	Order Receiving Firm MPID	Alphanumeric (4)	Data provided by firm.
4	Order Receiving Firm Order Received Date	Numeric (17)	Data provided by firm.
5	Order Receiving Firm Order ID	Alphanumeric (40)	Data provided by firm.
6	Issue Symbol ID	Alphanumeric (14)	Data provided by firm.
7	Originating Event	Alphanumeric (2)	Data from originating event provided by firm.
	Type Code		
8	Originating Event	Numeric (17)	Data from originating event provided by firm.
	Timestamp		

Seq. #	Name	Data Type (Length)	Permissible Values and Instructions
9	Subsequent Event Type Code	Alphanumeric (2)	Data from subsequent event provided by firm.
10	Subsequent Event Timestamp	Numeric (17)	Data from subsequent event provided by firm.
11	End of Record Marker	(1 or 2)	Values: LF (Line Feed) or CR/LF (Carriage Return/Line Feed).

Out of Sequence Event Trailer Record

Seq. #	Name	Data Type (Length)	M	Permissible Values and Instructions
1	Record Type	Alphanumeric (4)	M	'#QT#'—identifies a trailer record for Out of Sequence
	Code			Events.
2	Record Count	Numeric (8)	M	Total number of Out of Sequence events in the file.
				NOTE: This does not include the header and trailer.
3	End of Record	(1 or 2)	M	Values: LF (Line Feed) or CR/LF (Carriage Return/Line
	Marker			Feed).

APPENDIX C —ORDER REPORT FORMATS

OATS REPORTING TECHNICAL SPECIFICATIONS

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Appendix D — Glossary

ADF Alternative Display Facility was established by NASD as a member alternative to

NASDAQ for the display of quotations and orders. Transactions executed through the

ADF are reported to FINRA Trade Reporting Facility.

ATS Alternative Trading System, as defined in Rule

300(a)(1) of SEC Regulation ATS.

Context Error If a ROE is rejected because of a context error, its syntax is correct, but there is a

problem with the record in relation to other records. An Execution, Route, Desk, or Cancel, or Cancel/Replace Report will be rejected as a context error if it does not link to an existing order in OATS. Reasons an order might not exist in OATS include the following: the New Order Report was submitted and rejected because of a syntax error; the order was received before the firm began reporting to OATS, and because

the New Order Report was not yet submitted.

Desk Report Firms submit a Desk Report to OATS when an order is received by a desk or

department within the member firm.

Electronic Order An order that was captured by a member in an internal or external electronic order

routing or execution system. An order that is not captured in an electronic order

routing or execution system is a manual order.

Expired Order An open order that has exceeded its Time in Force.

FINRA transaction reporting system

Any system to which a member may report a transaction pursuant to FINRA transaction reporting rules. Such systems include the FINRA/NYSE TRF, ADF, FINRA/NASDAQ TRF and OTC Reporting Facility. Refer to Appendix A for the list

of FINRA transaction reporting systems.

Firm Order Report (FORE)

One or more Reportable Order Event (ROE) records preceded by a header and followed by a trailer that are submitted by an OSO to OATS. Multiple order event types may be represented in a single FORE. A separate FORE must be submitted for each Order Receiving Firm MPID that is subject to OATS reporting; multiple FOREs

can be combined in a single file.

Firm Order Report (FORE) File

One or more FOREs (header/trailer pairs) submitted in a file by an OSO to OATS. When multiple FOREs are sent in a single file, OATS treats each header/trailer combination as a separate submission. There is no limit to the number of FOREs that may be in the file nor to the number of ROEs that can be in a single FORE; however,

each file is limited to a maximum uncompressed file size of 25MB.

FORE Status Indicates whether the FORE was accepted or rejected and identifies errors or warnings.

Full Duplicate Two or more identical ROEs. OATS will accept the first record and reject all

subsequent identical records.

Key Duplicate Key duplicates occur when two or more orders contain the same OATS Order ID but

have different order details. Key duplicates have a rejection type of "Context." All records with key duplications are rejected unless the key duplication occurs over different reporting days. If the duplication occurs over more than one reporting day, the ROEs submitted on the first reporting day will be retained, while all ROEs received on subsequent reporting days with the duplicate OATS Order ID will be

rejected.

Manual Order An order captured by a member other than in an electronic order routing or execution

system. Also called a manual order.

Market Participant Identifier (MPID) The four character symbol assigned to a member firm by NASDAQ.

OATS Business Day For purposes of OATS reporting, a business day begins the second after the close of

Normal Market Hours on one market day and ends at the close of Normal Market Hours on the next market day. For example, Wednesday's OATS Business Day begins

at 16:00:01 Eastern Time on Tuesday and ends at 16:00:00 Eastern Time on

Wednesday. Any events occurring during this time period must be reported to OATS by 08:00:00 Eastern Time on Thursday. Also called the OATS Processing Date.

by 00.00.00 Eastern Time on Thursday. Also caned the OATS Hocessing Date.

OATS Order Identifier The three fields that comprise the OATS Order Identifier are Firm Order ID, Order

Receiving Firm MPID, and Order Received Date.

OATS Reportable Securities

All NMS stocks and OTC equity securities as defined in FINRA Rule 7410. Initial public offerings (IPOs), secondary offerings, Direct Participation programs (DPPs), "restricted securities", as defined by SEC Rule 144(a)(3) under the Securities Act of 1933, and any securities designated in the PORTAL Market are not reportable to

OATS.

OATS Reporting Day

The time period during which an order event must be reported to OATS or be marked

late. Events occurring during an OATS Business Day must be submitted to OATS by

08:00:00 Eastern Time the next calendar day.

Order Any oral, written, or electronic instruction to effect a transaction in an OATS

Reportable security that is received by a member from another person for handling or execution, or that is originated by a department of a member for execution by the same or another member, other than any such instruction to effect a proprietary transaction originated by a trading desk in the ordinary course of a member's market making

activities.

Order Receiving Firm The member firm that receives an oral, written, or electronic instruction to effect a

transaction in an OATS reportable security. The instruction may originate from a customer, another firm, or another department within the firm. (NOTE: Orders to effect a proprietary transaction originated by a trading desk in the ordinary course of a

member's market making activities are not subject to OATS reporting.)

Order Routing Firm

An FINRA member firm that transmits an order to another market center for handling or execution.

Order Sending Organization (OSO)

A FINRA member firm or a non-member entity that transmits order data to OATS on its own behalf, through another firm or entity, or on behalf of other firms or entities. The following distinction is made between the functions an OSO performs, though it may perform both functions simultaneously:

- Transmitting OSO—packages FORE files and physically transfers order data to OATS via FTP, SFTP, IFT, or the Web interface.
- Reporting OSO—authorized to view the Order Receiving Firm's data; for
 example, the Reporting OSO may be a clearing firm that reports on behalf of the
 Order Receiving Firm and is authorized to view that firm's data and correct
 rejected Reportable Order Events.

OATS Trade ID

An alphanumeric identifier that OATS will use to match Execution and Combined Order/Execution reports to trades reported to a FINRA transaction reporting system.

Reportable Non-Member

A U.S.-registered broker-dealer that is not a member, or a non-U.S.-registered broker-dealer that is not a member but has received an SRO-assigned identifier for purposes of accessing a FINRA facility pursuant to Rule 7220A or 7320.

Reporting Member

A member that meets the definition of a Reporting Member pursuant to FINRA Rule 7410.

Reserve Size Order

An order for which a customer has authorized the public display of part of the full size of the order with the remainder held in reserve on an undisplayed basis to be displayed in whole or in part as the displayed part is executed.

ROE Rejection

Identifies a rejected ROE and reasons for rejection. ROE Rejections may be retrieved via FTP, SFTP, IFT or the OATS Web interface.

Syntax Error

An incorrect field value or format within one ROE. Common syntax rejection reasons include missing mandatory fields, invalid fields, and invalid field combinations (invalid symbols and MPIDs are syntax rejections).