



Web EFT fileX Migration

Discussion of Impacts (Updated May 31, 2019)

Agenda

- **Key Dates**
- **User Impacts**
- **Entitlement**
- **FAQs**

Key Dates

○ **Testing Milestones**

- January 21, 2019 – Download reports first available for machine-to-machine testing
- March 4, 2019 – Uploads first available for machine-to-machine testing
- April 15, 2019 – User interface first available for testing

○ **Production Milestones**

- March 30, 2019 – fileX first available in production (machine-to-machine only)
- May 1, 2019 – User interface available in production

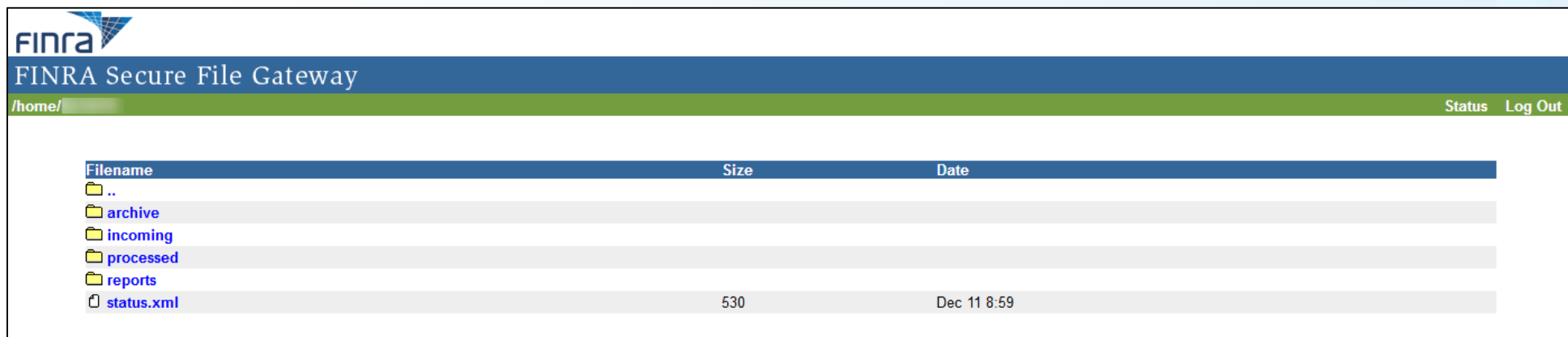
○ **Migration Deadline**

- June 30, 2019 – All current subscribers to have completed migration to fileX and all previous FSG production accounts disabled

User Impacts

FSG vs. fileX

- Previously, the Web EFT subscription service used FSG as the file transfer mechanism
- FSG had several drawbacks:
 - Limited options for machine-to-machine file transfers
 - Only one account per firm
 - Cumbersome onboarding process



The screenshot shows the FINRA Secure File Gateway interface. At the top left is the FINRA logo. Below it, the text "FINRA Secure File Gateway" is displayed. The current path is "/home/". In the top right corner, there are links for "Status" and "Log Out". The main content area displays a table of files and folders:

Filename	Size	Date
..		
archive		
incoming		
processed		
reports		
status.xml	530	Dec 11 8:59

FSG vs. fileX (cont.)

- **FSG is being replaced by fileX – FINRA’s enterprise file transfer platform**
- **fileX provides users with a number of efficiencies:**
 - Single FINRA platform for automated batch file transfers
 - New options for sending and receiving files (SFTP, HTTPS/REST, AWS S3 Direct)
 - See the fileX [User Guide](#) for additional information on the file transfer options
 - Multiple service accounts per firm



Download Impacts

- **Downloading reports:**
 - No changes to format, content, or filenames
 - Report filename extensions may be updated to .xml in a future release (TBD)
 - Reports will continue to be generated on the current schedule
 - The previous concept where reports would disappear after being accessed will be retired
 - Ability to delete or rename files is not supported in fileX
 - After a report is accessed, the file will remain in the Reports folder for 30 days
 - Users will need to parse the Reports folder to identify new files to download (such as by filename or timestamp)

Upload Impacts

○ Uploading files

- No changes to schemas
- Filename extension for uploads and results updated to .xml
 - Previous .nrq/.nrs filename extensions are retired
- Uploaded files will be retained in the Incoming Archive folder for 30 days
 - Each archived file will have a standard timestamp added as a prefix (e.g. – “<timestamp>_<filename>.xml”)
- Results files will be retained in the Results folder for 30 days
 - The file will have “Results_” added as a prefix (e.g. – “Results_<filename>.xml”)
 - The status.xml file will no longer be provided, however the complete filing details will continue to be provided in the results file that corresponds to each upload
- Duplicate upload filenames are not allowed within 30 days (baseline)
 - If a duplicate filename is submitted, a timestamp will be added to the results filename (e.g. – “Results_<timestamp>_<filename>.xml”)
 - Results file will contain an error message referencing failure due to duplicate filename

Upload Impacts (cont.)

○ Uploading files (cont.)

- **(Updated)** Within the results file, the following timestamps will be updated to a standard format that includes milliseconds:
 - StartTime
 - EndTime
 - UploadTime
- **(Updated)** Email notifications for batch uploads will be automatically sent to the email address associated with the user account that uploads the file
 - Notifications will also continue to be sent to entries in the optional 'Email' field within the uploaded file

(Note: Due to security settings in FINRA's lower environments, email notifications are not sent for test uploads)

Folder Structure

- See fileX folder structure below. For additional information regarding application sub-spaces, please review the fileX [User Guide](#).

Folder	Contents	Actions	File Retention
/crd/incoming_filings	New filings uploaded by the firm	Upload	Immediately moved
/crd/incoming_filings_arcv	Previous uploads by the firm	Download	30 days
/crd/results	Form filing results files	Download	30 days
/crd/reports	Daily and weekly reports	Download	30 days

Entitlement

Existing Subscriber – Testing Access

- **(Updated) Requesting testing access before June 30:**
 - Have a current EFT contact send a request for fileX QA environment access to WebEFT.Support@finra.org (including firm's CRD number)
 - FINRA will provide the contact with a service account for machine-to-machine testing
 - Use the service account to connect to the fileX QA endpoint
 - If multiple service accounts are needed, please include that in the request
 - Access to the test user interface requires a separate login to a separate URL, and is also available by request from a current contact

Existing Subscriber – Production Access

- **(Updated) Obtaining production accounts:**
 - Existing subscribers must obtain new production credentials for fileX prior to June 30
 - To obtain a production service account, submit the new [Web EFT Entitlement Form](#):
 - **Submit directly to FINRA's Entitlement team using the instructions on page one of the form**
 - If multiple service accounts are needed, such as in the scenario where the firm also uses a vendor, submit a separate form for each account
 - The entitlement for each production service account will match the firm's current subscription level
 - The firm's Super Account Administrator (SAA) is able to grant separate access to the production user interface
 - The SAA does this using the same process they already utilize to entitle users for other systems
 - Production UI accounts created by the SAA are separate from the service accounts described above, and are used at a separate URL (see also FAQ #7 [here](#))

Web EFT Contacts (New)

- The previous concept of Web EFT contacts was based on the single-account model (multiple individuals authorized to receive the password for a single login). Since fileX allows firms to create multiple accounts, this concept will be adjusted.
- Going forward, a list of contacts for each firm will continue to be maintained for verification and notification purposes (e.g. - verifying that the individual is authorized to discuss the firm's data, or notifying the firm of their annual subscription renewal).
- To grant system access to multiple users for the same firm, the firm should create a separate account for each user rather than simply listing them as additional contacts.
- We will reach out to each firm individually in the months of July and August to confirm their current list of contacts. After that, firms will be able to keep their contact list up-to-date via email to WebEFT.Support@finra.org.

New Subscriber Onboarding

- **Firms without an existing Web EFT subscription will need to start a new subscription in order to access fileX:**
 - Visit www.finra.org/webeft for subscription and pricing information
 - Complete the “New Subscriber Packet” (available at the same link) and submit to FINRA per the instructions in the zip file
 - Once the forms are processed, the firm will immediately receive production access and the applicable fees will be immediately deducted from the firm’s Flex-Funding Account
 - Firms are no longer required to test prior to accessing production
 - FINRA will also follow-up with the firm regarding establishing contacts and accessing the test environment

FAQs

Frequently Asked Questions

- **My firm plans to use the SFTP method. Does FINRA need to whitelist my firm's IP addresses?**
 - Yes. If the IP addresses used to connect to fileX are different from the IP addresses previously used to connect to FSG, please send the list of IP addresses to WebEFT.Support@finra.org for whitelisting. (If you are using the same IP addresses, these have already been whitelisted.)
- **My tests using the HTTPS/REST method have been unsuccessful. What am I doing wrong?**
 - Uploading and downloading files using HTTPS/REST is a two-step process. You must first obtain the pre-signed URL, and then use that pre-signed URL to upload or download the file. Please refer to pages 12-15 of the fileX [User Guide](#) for examples.
- **When I submit test uploads using the same format previously used with FSG, I keep receiving an "Invalid XML" error. What could be the issue?**
 - Your process to create/submit files may be adding extra XML content beyond the fields specified in the schema. FSG may have previously ignored such extra content, but file processing through fileX will strictly adhere to the current schema. Please review and adjust your process to remove any extra XML content.

(For additional troubleshooting tips, please see pages 19-22 of the fileX [User Guide](#).)



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