FIX Global Technical Committee

IIROC Client Identification Proposal

January 28February 20, 2020

Revision 0.32

Proposal Status: DraftApproved

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Document History

Revision	Date	Author	Revision Comments
0.1	January 22, 2020	Hanno Klein, FIX GTC	Initial draft
0.2	January 28, 2020	Hanno Klein, FIX GTC	Updated with review comments from Lisa Taikitsadaporn
0.3	February 20, 2020	Hanno Klein, FIX GTC	Resolved public review comment related to routing arrangements. Requires the addition of order handling messages.
	February 27, 2020	Rich Shriver, FIX GTC	Preassigned IDs

1 Introduction

One of the functions of the Investment Industry Regulatory Organization of Canada (IIROC) is to conduct real-time market surveillance to ensure that trading is carried out in accordance with securities trading rules. To facilitate this task, IIROC requires each market to provide real-time market transaction data to its market surveillance system – otherwise referred to as a "market regulation feed". To help accommodate this requirement, IIROC has developed the *FIX Market Regulation Feed – FIX Specification*. The specification is being used by the markets to update and configure their respective FIX engines.

IIROC in consultation with the Canadian Markets and FPL chose FIX Version 5.0 SP2 with Extension Packs (now called **FIX Latest**) for the market regulation feed. Since May 2009, a number of FIX Extension Packs[1] (EP101, EP104, EP164) were created and ratified by the FIX Global Technical Committee to accommodate IIROC's market surveillance feed requirements.

On April 18, 2019, IIROC issued Rules Notice 19-0071 – *Amendments Respecting Client Identifiers*[2]. This resulted in a small number of new requirements necessitating a FIX Gap Analysis to cover some of them. This document only contains the gaps in FIX Latest that need to be closed and does not represent a comprehensive guideline for the mapping of all new IIROC reporting obligations related to client identification. The majority is actually already covered by FIX Latest.

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[1] See https://www.fixtrading.org/extension-packs/
[2] See https://www.osc.gov.on.ca/documents/en/Marketplaces/iiroc_20190418_notice-amendments-respecting-client-identifiers.pdf

2 Business Requirements

The following section detail the new IIROC reporting requirements requiring an extension of FIX Latest. These are mainly related to information about the counterparty of an execution or trade. Note that IIROC as regulator requires information about both sides of a transaction from exchanges even if the trading model of the exchanges is conducted anonymously from the viewpoint of the marketplace.

The Canadian marketplaces use NewOrderSingle(35=D) instead of NewOrderCross(35=s) to submit cross orders whereby buy- and sell-side information is provided with a number of user defined fields. The standard workflow in FIX would require two separate ExecutionReport(35=8) message in response to a single NewOrderCross(35=s) message. When using NewOrderSingle(35=D), only a single ExecutionReport(35=8) message is sent back to the submitter. Hence, IIROC is receiving such messages in the context of regulatory reporting from the Canadian marketplaces.

2.1 Customer Account of the Counterparty

FIX supports the identification of a customer account by means of PartyRole(452) = 24 (Customer Account) as part of an instance of the Parties component. The requirement is to support this with regard to the counterparty in the ExecutionReport(35=8) message.

It is proposed to add a new valid value "TBD = Contra Customer Account126 = Contra Customer Account to PartyRole(452).

Note that this extension is not applicable to NewOrderCross(35=s) or TradeCaptureReport(35=AE) messages as their structure contains a repeating group SideCrossOrdModGrp or TrdCapRptSideGrp respectively with one instance for each side and having a Parties component.

2.2 Algorithm used by the Counterparty

FIX supports the identification of an algorithm by means of PartyRole(452) = 122 (Investment Decision Maker) in conjunction with PartyRoleQualifier(2376) = 22 (Algorithm) as part of an instance of the Parties component. The requirement is to support this with regard to the counterparty in the ExecutionReport(35=8) message.

It is proposed to add a new valid value TBD = Contra Investment Decision Maker127 = Contra Investment Decision Maker to PartyRole(452).

Note that this extension is not applicable to NewOrderCross(35=s) or TradeCaptureReport(35=AE) messages as their structure contains a repeating group SideCrossOrdModGrp or TrdCapRptSideGrp respectively with one instance for each side and having a Parties component.

2.3 Order Origination of the Counterparty

FIX supports the specification of the origin of an order by means of OrderOrigination(1724). The main requirement is to support the same with regard to the counterparty in the ExecutionReport(35=8) message.

It is proposed to add a new field ContraOrderOriginationContraOrderOrigination(TBD2882) to the ExecutionReport(35=8) message. The new field should use the same valid values as the existing field OrderOrigination(1724). Additionally, it is proposed to add the existing field OrderOrigination(1724) to

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the SideCrossOrdModGrp to support this capability for the entry and modification of cross order messages.

Note that the new field ContraOrderOriginationContraOrderOrigination(TBD2882) is not applicable to NewOrderCross(35=s) or TradeCaptureReport(35=AE) messages as their structure contains a repeating group SideCrossOrdModGrp or TrdCapRptSideGrp (with the component TradeReportOrderDetail) respectively with one instance for each side containing OrderOrigination(1724).

2.4 New Order Originations

IIROC requires explicit designations of the origin of an order submitted to the market:

- Direct Electronic Access (DEA)
- Routing Arrangement (RA)
- Foreign Dealer Equivalent (FDE)
- Order Execution Only (OEO)

FIX already supports Direct Electronic Access (DEA) as follows:

- OrderOrigination(1724) = 5 (Order received from a direct access […] customer)

It is proposed to add new values to OrderOrigination(1724) as follows:

- For foreign dealer equivalent (FDE):

    6 = Order received from a foreign dealer equivalent6 = Order received from a foreign dealer equivalent

    [Elaboration: A foreign dealer equivalent is a person in the business of trading securities in a foreign jurisdiction in a manner analogous to an investment dealer and that is subject to the regulatory jurisdiction of a signatory to the International Organization of Securities Commissions' (IOSCO) Multilateral Memorandum of Understanding
    in that foreign jurisdiction.][Elaboration: A foreign dealer equivalent is a person in the business of trading securities in a foreign jurisdiction in a manner analogous to an investment dealer and that is subject to the regulatory jurisdiction of a signatory to the International Organization of Securities Commissions' (IOSCO) Multilateral Memorandum of Understanding

    in that foreign jurisdiction.]

- For order execution only (OEO):

    7 = Order received from an execution-only service7 = Order received from an execution-only service

    [Elaboration: The acceptance and execution of orders from customers for trades that the broker-dealer has not recommended and for which the broker-dealer takes no responsibility as to the appropriateness or suitability of orders accepted or account positions held.][Elaboration: The acceptance and execution of orders from customers for trades that the broker-dealer has not recommended and for which the broker-dealer takes no responsibility as to the appropriateness or suitability of orders accepted or account positions held.]

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Routing arrangements are not mutually exclusive with execution-only services (OEO) and require a separate indicator. It is proposed to add new fields RoutingArrangementIndicator(TBD2883) and ContraRoutingArrangementIndicator(TBD2884) as follows:

[Elaboration: An arrangement under which a participant of a marketplace permits a broker to electronically transmit orders containing the identifier of the participant. This can be either through the systems of the participant for automatic onward transmission to a marketplace or directly to a marketplace without being electronically transmitted through the systems of the participant.][Elaboration: An arrangement under which a participant of a marketplace permits a broker to electronically transmit orders containing the identifier of the participant. This can be either through the systems of the participant for automatic onward transmission to a marketplace or directly to a marketplace without being electronically transmitted through the systems of the participant.]

- 0 = No routing arrangement in place0 = No routing arrangement in place
- 1 = Routing arrangement in place1 = Routing arrangement in place

2.5 New Account Types

FIX supports a number of different account types with AccountType(581). IIROC requires an ability to additionally distinguish the following types of an order currently not supported in FIX:

- Bundled Order (BU) – An order that includes a client order as well as a non-client order or principal order, or both.

- Multiple Client Order (MC) – An order that includes orders from more than one client but does not include a principal order or a non-client order.

In the context of IIROC, non-clients are for example employees of an exchange member[3].

It is proposed to add new valid values to AccountType(581) as follows:

- Bundled order (BU):

    12 = Account for customer and non-customer ordersTBD = Account for customer and non-customer ordersTBD = Account for customer and non-customer orders

    [Elaboration: Account aggregates orders from customers and non-customers.

    In the context of IIROC UMIR this account type can be used for bundled orders (BU), i.e. orders including client, non-client and principal orders.][Elaboration: Account aggregates orders from customers and non-customers. In the context of IIROC UMIR this account type can be used for bundled orders (BU), i.e. orders including client, non-client and principal orders.]

- Multiple client order (MC):

    13 = Account for orders from multiple customersTBD = Account for orders from multiple customersTBD = Account for orders from multiple customers

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[3] See https://www.iiroc.ca/industry/Client-Identifiers/Pages/Glossary-of-Terms.aspx

[Elaboration: Account aggregates orders from multiple customers.

In the context of IIROC UMIR this account type can be used for multiple client orders (MC), i.e. orders including orders from more than one client but no principal or non-client orders.][Elaboration: Account aggregates orders from multiple customers. In the context of IIROC UMIR this account type can be used for multiple client orders (MC), i.e. orders including orders from more than one client but no principal or non-client orders.]

3 Issues and Discussion Points

There are no issues or discussion points.

4 Proposed Message Flow

There are no changes to existing FIX message flows.

5 FIX Message Tables

5.1 FIX Message NewOrderSingle(35=D)

To be completed at the time of the proposal – all information provided will be stored in the repository	
Message Name	NewOrderSingle
Message Abbreviated Name (for FIXML)	Order
Category	(no change)
Action	__New _X_Change

Message Synopsis	(no change)
Message Elaboration	(no change)

To be finalized by FPL Technical Office	
(MsgType(tag 35) Enumeration	D
Repository Component ID	14

Tag	Field Name	Req'd	Action	*Mappings and Usage Comments*	*FIX Spec Comments*
Standard Header		Y			MsgType=D
(…truncated…)					
1724	OrderOrigination	N			
~~TBD~~ 2882	ContraOrderOrigination	N	NEW		May be used for cross orders submitted with single order messages.
1725	OriginatingDeptID	N			
1726	ReceivingDeptID	N			
~~TBD~~ 2883	RoutingArrangementIndicator	N	NEW		
~~TBD~~ 2884	ContraRoutingArrangementIndicator	N	NEW		May be used for cross orders submitted with single order messages.
(…truncated…)					
Standard Trailer		Y			

5.2 FIX Message OrderCancelReplaceRequest(35=G)

To be completed at the time of the proposal – all information provided will be stored in the repository	
Message Name	OrderCancelReplaceRequest
Message Abbreviated Name (for FIXML)	OrdCxlRplcReq
Category	*(no change)*
Action	__New _X_Change
Message Synopsis	*(no change)*
Message Elaboration	*(no change)*
To be finalized by FPL Technical Office	
MsgType(tag 35) Enumeration	G
Repository Component ID	17

Tag	Field Name	Req'd	Action	*Mappings and Usage Comments*	*FIX Spec Comments*
Standard Header		Y			MsgType=G
(…truncated…)					
1724	OrderOrigination	N			
~~TBD~~ 2882	ContraOrderOrigination	N	NEW		May be used for cross orders submitted with single order messages.
1725	OriginatingDeptID	N			
1726	ReceivingDeptID	N			
~~TBD~~ 2883	RoutingArrangementIndicator	N	NEW		
~~TBD~~ 2884	ContraRoutingArrangementIndicator	N	NEW		May be used for cross orders submitted with single order messages.
(…truncated…)					
Standard Trailer		Y			

5.3 FIX Message ExecutionReport(35=8)

To be completed at the time of the proposal – all information provided will be stored in the repository	
Message Name	ExecutionReport
Message Abbreviated Name (for FIXML)	ExecRpt
Category	(no change)
Action	__New _X_Change
Message Synopsis	(no change)
Message Elaboration	(no change)
To be finalized by FPL Technical Office	
(MsgType(tag 35) Enumeration	8
Repository Component ID	9

Tag	Field Name	Req'd	Action	Mappings and Usage Comments	FIX Spec Comments
Standard Header		Y			
Component Block **ApplicationSequenceControl**					
37	OrderID	Y			
2422	OrderRequestID	N			
(…truncated…)					
1724	OrderOrigination	N			
TBD 2882	ContraOrderOrigination	N	NEW		May be used for cross orders submitted with single order messages.
1725	OriginatingDeptID	N			
1726	ReceivingDeptID	N			
TBD 2883	RoutingArrangementIndicator	N	NEW		
TBD 2884	ContraRoutingArrangementIndicator	N	NEW		May be used for cross orders submitted with single order messages.
52217 25	OwnerTypeOriginatingDeptID	N			
(…truncated…)					
Standard Trailer		Y			

6 FIX Component Blocks

6.1 FIX Component SideCrossOrdModGrp

To be completed at the time of the proposal – all information provided will be included in the repository	
Component Name	SideCrossOrdModGrp
Component Abbreviated Name (for FIXML)	SideCrossMod
Component Type	_X__ Block Repeating ___ Block
Category	(no change)
Action	__New _X_Change
Component Synopsis	(no change)
Component Elaboration	(no change)
To be finalized by FPL Technical Office	
Repository Component ID	2059

Component FIXML Abbreviation: <SideCrossMod>					
Tag	Field Name		Req'd	Action	Mappings and Usage Comments	Comments
552	NoSides		N			
→	54	Side	N			Required if NoSides(552) > 0.
→	(…truncated…)		N			
→	528	OrderCapacity	N			
→	529	OrderRestrictions	N			
→	1724	OrderOrigination	N	ADD		
→	1725	OriginatingDeptID	N	ADD		
→	1726	ReceivingDeptID	N	ADD		
→	TBD 2883	RoutingArrangementIndicator	N	NEW		
→	1091	PreTradeAnonymity	N			
→	(…truncated…)		N			
</ SideCrossMod >					

7 Category Changes

There are no changes to existing categories.

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Appendix A – Data Dictionary

Tag	FieldName	Action	Data-type	Description	FIXML Abbreviation	Add to / Deprecate from Message type or Component block
~~TBD~~ 2882	ContraOrderOrigination	NEW	Int	Identifies the origin of the order from the counterparty of the execution or trade. *Uses enums from OrderOrigination(1724)*	@CntraOrdOrigntn	Add to NewOrderSingle(35=D) OrderCancelReplaceRequest(35=G), ExecutionReport(35=8)
~~TBD~~ 2883	RoutingArrangementIndicator	NEW	Int	Indicates whether a routing arrangement is in place, e.g. between two brokers. May be used together with OrderOrigination(1724) to further describe the origin of an order. [Elaboration: An arrangement under which a participant of a marketplace permits a broker to electronically transmit orders containing the identifier of the participant. This can be either through the systems of the participant for automatic onward transmission to a marketplace or directly to a marketplace without being electronically transmitted through the systems of the participant.] Valid values: 0 = No routing arrangement in place 1 = Routing arrangement in place	@RtgArrngmntInd	Add to NewOrderSingle(35=D) OrderCancelReplaceRequest(35=G), ExecutionReport(35=8) and component SideCrossOrdModGrp
~~TBD~~ 2884	ContraRoutingArrangementIndicator	NEW	Int	Indicates whether a routing arrangement is in place, e.g. between two brokers. May be used together with ContraOrderOrigination(~~TBD~~2882) to further describe the origin of an order.	@CntraRtgArrngmntInd	Add to NewOrderSingle(35=D) OrderCancelReplaceRequest(35=G),

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Tag	FieldName	Action	Data-type	Description	FIXML Abbreviation	Add to / Deprecate from Message type or Component block
				Uses enums from RoutingArrangementIndicatorRoutingArrangementIndicator(TBD2883).		ExecutionReport(35=8)
452	PartyRole	CHANGE	Int	Identifies the type or role of the PartyID (448) specified. See "Appendix 6-G - Use of <Parties> Component Block" (see Volume : "Glossary" for value definitions) Valid values: 1 = Executing Firm … 123 = Publishing intermediary TBD 126 = Contra Customer Account [Elaboration: Same as PartyRole(452) = 24 (Customer Account) but for the counterparty. Can be used whenever the parties component is not nested in a repeating group representing both sides.] TBD 127 = Contra Investment Decision Maker [Elaboration: Same as PartyRole(452) = 122 (Investment Decision Maker) but for the counterparty. Can be used whenever the parties component is not nested in a repeating group representing both sides.]		
581	AccountType	CHANGE	Int	Type of account associated with an order Valid values:		

Tag	FieldName	Action	Data-type	Description	FIXML Abbreviation	Add to / Deprecate from Message type or Component block
				1 = Account is carried on customer side of books … 11 = Options firm account TBD 12 = Account for customer and non-customer orders [Elaboration: Account aggregates orders from customers and non-customers. In the context of IIROC UMIR this account type can be used for bundled orders (BU), i.e. orders including client, non-client and principal orders.] TBD 13 = Account for orders from multiple customers [Elaboration: Account aggregates orders from multiple customers. In the context of IIROC UMIR this account type can be used for multiple client orders (MC), i.e. orders including orders from more than one client but no principal or non-client orders.]		
1724	OrderOrigination	CHANGE	Int	Identifies the origin of the order. Valid values: 1 = Order received from a customer 2 = Order received from within a firm 3 = Order received from another broker-dealer 4 = Order received from a customer or originated from within the firm 5 = Order received from a direct access or sponsored access customer		

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Tag	FieldName	Action	Data-type	Description	FIXML Abbreviation	Add to / Deprecate from Message type or Component block
				~~TBD~~ 6 = Order received from a foreign dealer equivalent [Elaboration: A foreign dealer equivalent is a person in the business of trading securities in a foreign jurisdiction in a manner analogous to an investment dealer and that is subject to the regulatory jurisdiction of a signatory to the International Organization of Securities Commissions' (IOSCO) Multilateral Memorandum of Understanding in that foreign jurisdiction.] ~~TBD~~ 7 = Order received from an execution-only service [Elaboration: The acceptance and execution of orders from customers for trades that the broker-dealer has not recommended and for which the broker-dealer takes no responsibility as to the appropriateness or suitability of orders accepted or account positions held.]		

Appendix B - Glossary Entries

Term	Definition	Field where used

Appendix C - Abbreviations

Term	Proposed Abbreviation	Proposed Messages, Components, Fields where used
Arrangement	ArngmntArrgmt	RoutingArrangementIndicator(2883)

Appendix D - Usage Examples

Appendix E – Disposition of Public Comments

Public comment from Hanno Klein, FIXdom:

- Usage of OrderOrigination(1724) to indicate routing arrangements does not work as it is not mutually exclusive with all other values, specifically not with FDE and OEO, the two new values proposed. The existence of a routing arrangement needs to be conveyed separately.

  Resolution: separate field for routing arrangements (including contra side information)

  Action: add RoutingArrangementIndicatorRoutingArrangementIndicator(2883) and ContraRoutingArrangementIndicatorContraRoutingArrangementIndicator(2884)

Public comments from Rob Dodson, <company>:

- Please could the community recommend how adding an AccountType(581) of Multiple client order (MC) differs from setting an OrderAttributeType(2594) to 0 (Aggregated Order)?

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For example how should an international client send this type of order from Europe to a Canadian broker?

Resolution: OrderAttributeType(2594) = 0 (Aggregated Order) does not convey whether the orders being aggregated are from a single or multiple client(s).

Action: None.

- We have been advised that a "BrokerNumber" is required with a description of "An exchange assigned three digit public number identifying member firm". If agreed this is a requirement please can the recommendation be added to the document. Our expectation is this would be a part rule/id source combination.

  Resolution: This document (Gap Analysis) is not intended for recommended practices. This may be provided by the marketplace(s) in their documentation.

  Action: None.

- It has been recommended that 1031 may require four additional values "DEA, RA, OEO and FDE". If agreed please could these be added to the proposal.

  Resolution: CustOrderHandlingInst(1031) is about handling instructions for the order prior to execution and does not reflect the origin of the order covered by OrderOrigination(1724). "DEA, RA, OEO and FDE" are not instructions for the execution of an order.

  Action: None.