FIX Global Technical Committee

RegulatoryTradeIDGrp Enhancements

August 15, 2022

v0.3

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RegulatoryTradeIDGrp Enhancements
FIX-Protocol-Gap-Analysis-RegulatoryTradeIDGrp-Enhancement-
v0.3_ASBUILT_EP275_changetracked.docx

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Document History

Revision	Date	Author	Revision Comments
v0.1	August 11, 2022	GTC PM	Initial draft
v0.2	August 15, 2022	GTC PM	Minor editorial changes
V0.3	October 9, 2022	GTC Tech	Added Confirmation(35=AK) and ConfirmationAck(35=AU) messages and inserted references to RegulatoryTradeIDGrp component per disposition of public comments.

1 Introduction

This gap analysis proposal seeks to address a specific update to the CFTC Parts 43 and 45 reporting technical specification requirements, where both the Unique Swap Identifier (USI) and Unique Transaction Identifier (UTI) can be used for reporting purposes to the CFTC.

2 Business Requirements

The US Commodity Futures Trading Commission published an update to their Technical Specification for Parts 43 and 45 swap data reporting and public dissemination requirements September 30, 2021, Version 3.0 which can be found at this link:

https://www.cftc.gov/media/3496/DMO_Part43_45TechnicalSpecification022020/download

Supplementary information regarding the USI Data Standard can be found at this link:

https://www.cftc.gov/sites/default/files/idc/groups/public/@swaps/documents/dfsubmission/usidatastandards100112.pdf

In the updated guidelines, lines 102 and 103 from the table in Section 2 "Technical Specification and Validation Rules" indicated the following requirements (in summary of the image from the Technical Specification):

1. USI - conditionally required if UTI is not populated, otherwise blank

2. UTI - conditionally required if USI is not populated, otherwise blank

| 102 | CFTC | Transaction related | Unique swap identifier (USI) | The USI is a unique identifier assigned to all swap transactions which identifies the transaction (the swap and its counterparties) uniquely throughout its duration. It consists of a namespace and a transaction identifier. | Varchar(42) | Refer to: CFTC USI Data Standard[69] Up to 42 alphanumeric characters | C | C | C | C | C | **Transaction** C if [Unique transaction identifier (UTI)] is not populated, else {blank} **Collateral** C if [Initial margin collateral portfolio code] = 'TRANSACTIONLEVEL' and [Unique transaction identifier (UTI)] is not populated, else {blank} | Y | Y | **Validation** Same as part 45 (Transaction) **Dissemination** Do not disseminate |

[69] Throughout this Technical Specification, references to "CFTC USI Data Standard" should refer to the USI Data Standard, https://www.cftc.gov/sites/default/files/idc/groups/public/@swaps/documents/dfsubmission/usidatastandards100112.pdf

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				Technical Specification									**Validation Rules and Dissemination Rules**			
#	Source	Category	Data Element Name	Definition for Data Element	Format	Allowable Values	**P43/P45 Asset Class**					Part 45 SDR Validation Rules	P45 End of Day	P43 Reported	Part 43 SDR Validation and Dissemination Rules
							CR	IR	EQ	FX	CO				
103	CFTC	Transaction related	Unique transaction identifier (UTI)	A unique identifier assigned to all swap transactions which identifies the swap uniquely throughout its lifecycle and used for all recordkeeping and all swap data reporting pursuant to §45.5. A UTI is comprised of the LEI of the generating entity and a unique alphanumeric code.	Varchar(52)	ISO 23897 Unique transaction identifier Up to 52 alphanumeric characters	C	C	C	C	C	**Valuation** C if [Unique transaction identifier (UTI)] is not populated, else {blank} **Transaction** C if [Unique swap identifier (USI)] is not populated, else {blank} **Collateral** C if [Initial margin collateral portfolio code] = 'TRANSACTIONLEVEL' and [Unique swap identifier (USI)] is not populated, else {blank} **Valuation** C if [Unique swap identifier (USI)] is not populated, else {blank}	Y	Y	**Validation** Same as part 45 (Transaction) **Dissemination** Do not disseminate

The USI follows the USI Data Standard as described in USI Data Standard link above, while the UTI is the ISO 23897.

When FIX was enhanced to support the Dodd-Frank Act's Parts 43/45 reporting requirements in 2012, the repeating components RegulatoryTradeIDGrp, SideRegulatoryTradeIDGrp and AllocRegulatoryTradeIDGrp were designed to meet the CFTC requirements as UTI was not yet a standard. The CFTC's USI Data Standard had called for a 2-field representation of the USI where the first "field" is the namespace identifying "the registered entity creating the USI" and the second "field" contains the transaction identifier, FIX's component was designed with this separation using the RegulatoryTradeID(1903) and RegulatoryTradeIDSource(1905) fields with the latter field being the field for the namespace.

The UTI ISO 23897 standard is defined as a single string where the entity creating the identifier is part of the UTI in the form of the entity's LEI (ISO 17442 Legal Entity Identifier), therefore a separate namespace is not needed.

In order to now meet the requirements of being able to convey both the USI and UTI in the same components in FIX, the following are the proposed changes to the RegulatoryTradeIDSource(1905) field's description in the FIX data dictionary:

- Add a field elaboration: *In the context of CFTC usage for Unique Swap Identifier (USI), this field is required to convey the namespace of the entity creating the USI, in accordance to the USI Data Standard (https://www.cftc.gov/sites/default/files/idc/groups/public/@swaps/documents/dfsubmission/usidatastandards100112.pdf).*

- Add a code set value to this field with a single value **1 = Unique Transaction Identifier (ISO 23897)** to allow for explicit indication that the value in RegulatoryTradeID(1903) is a UTI value.

  Implementations may choose to bilaterally agree to omit RegulatoryTradeIDSource(1905) if they are conveying UTI in RegulatoryTradeID(1903) as this field is not required in the repeating group. However, RegulatoryTradeIDSource(1905) is required to contain the namespace when conveying USI.

3 Issues and Discussion Points

4 Proposed Message Flow

There are not changes to existing message flows.

5 FIX Message Tables

5.1 FIX Message Confirmation(35=AK)

To be completed at the time of the proposal – all information provided will be stored in the repository	
Message Name	Confirmation
Message Abbreviated Name (for FIXML)	Cnfm
Category	Confirmation
Action	__New _X_Change
Message Synopsis	The Confirmation messages are used to provide individual trade level confirmations from the sell side to the buy side. In versions of FIX prior to version 4.4, this role was performed by the allocation message. Unlike the allocation message, the confirmation message operates at an allocation account (trade) level rather than block level, allowing for the affirmation or rejection of individual confirmations.
Message Elaboration	
To be finalized by FPL Technical Office	
(MsgType(tag 35) Enumeration	AK
Repository Component ID	70

Tag	Field Name	Req'd	Action	Mappings and Usage Comments	FIX Spec Comments
	Standard Header	Y			MsgType =
<<truncated>>					

Tag	Field Name	Req'd	Action	*Mappings and Usage Comments*	FIX Spec Comments
940	AffirmStatus	N			Used to communicate an "affirmed" Confirmation(35=AK) status message (i.e. when ConfirmType(773) = 1 (Status)) to interested parties that need to or should receive such confirmation status message. This field must not be used when sending a Confirmation(35=AK) message that needs to be affirmed.
	RegulatoryTradeIDGrp	N	ADD		
2390	TradeConfirmationReferenceID	N			
	<<truncated>>				
	Standard Trailer	Y			

5.2 FIX Message ConfirmationAck(35=AU)

To be completed at the time of the proposal – all information provided will be stored in the repository	
Message Name	ConfirmationAck
Message Abbreviated Name (for FIXML)	CnfmAck
Category	Confirmation
Action	__New _X_Change
Message Synopsis	The Confirmation Ack (aka Affirmation) message is used to respond to a Confirmation message.
Message Elaboration	
To be finalized by FPL Technical Office	
(MsgType(tag 35) Enumeration	AU
Repository Component ID	80

Tag	Field Name	Req'd	Action	Mappings and Usage Comments	FIX Spec Comments
	Standard Header	Y			MsgType =
<<truncated>>					
940	AffirmStatus	N			
RegulatoryTradeIDGrp		N	ADD		
2390	TradeConfirmationReferenceID	N			
<<truncated>>					
	Standard Trailer	Y			

6 FIX Component Blocks

No changes

7 Category Changes

No changes

Appendix A - Data Dictionary

Tag	FieldName	Action	Datatype	Description	FIXML Abbreviation	Add to / Deprecate from Message type or Component block
1905	RegulatoryTradeIDSource	CHANGE	String	Identifies the reporting entity that originated the value in RegulatoryTradeID(1903). The reporting entity identifier may be assigned by a regulator or from a supported standard identifier source scheme. Elaboration: In the context of CFTC usage for Unique Swap Identifier (USI), this field is required to convey the namespace of the entity creating the USI, in accordance to the USI Data Standard (https://www.cftc.gov/sites/default/files/idc/groups/public/@swaps/documents/dfsubmission/usidatastandards100112.pdf). For standardized identifier source schemes, such as the Unique Transaction Identifier (UTI), the source scheme is identified using supported code values. Supported values: 1 = Unique Transaction Identifier (ISO 23897)	Src	

Tag	FieldName	Action	Datatype	Description	FIXML Abbreviation	Add to / Deprecate from Message type or Component block
1910	AllocRegulatoryTradeIDSource	CHANGE	String	Identifies the reporting entity that originated the value in AllocRegulatoryTradeID(1909). The reporting entity identifier may be assigned by a regulator or from a supported standard identifier source scheme. Elaboration: In the context of CFTC usage for Unique Swap Identifier (USI), this field is required to convey the namespace of the entity creating the USI, in accordance to the USI Data Standard (https://www.cftc.gov/sites/default/files/idc/groups/public/@swaps/documents/dfsubmission/usidatastandards100112.pdf). For standardized identifier source schemes, such as the Unique Transaction Identifier (UTI), the source scheme is identified using supported code values. *Uses enums from RegulatoryTradeIDSource(1905)*	Src	

Tag	FieldName	Action	Datatype	Description	FIXML Abbreviation	Add to / Deprecate from Message type or Component block
1973	SideRegulatoryTradeIDSource	CHANGE	String	Identifies the reporting entity that originated the value in SideRegulatoryTradeID(1972). The reporting entity identifier may be assigned by a regulator or from a supported standard identifier source scheme. Elaboration: In the context of CFTC usage for Unique Swap Identifier (USI), this field is required to convey the namespace of the entity creating the USI, in accordance to the USI Data Standard (https://www.cftc.gov/sites/default/files/idc/groups/public/@swaps/documents/dfsubmission/usidatastandards100112.pdf). For standardized identifier source schemes, such as the Unique Transaction Identifier (UTI), the source scheme is identified using supported code values. *Uses enums from RegulatoryTradeIDSource(1905)*	Src	

Appendix B - Glossary Entries

Term	Definition	Field where used

Appendix C - Abbreviations

Term	Proposed Abbreviation	Proposed Messages, Components, Fields where used

Appendix D - Usage Examples

[Examples may be entered below this line]

Appendix E – Disposition of Public Comments

Public comments from the forum during the public comment period indicated a need for the RegulatoryTradeIDGrp component to be included in the Confirmation(35=AK) and ConfirmtionAck(35=AU) messages.

Resolution: The component RegulatoryTradeIDGrp was added to both the Confirmation(35=AK) and ConfirmationAck(35=AU) messages.