

Specialist Transaction Data Reporting System Technical Documentation

Version 1.5



SAC

June 6, 2005

Chapter 1 Introduction

1.1 Copyright/Trademark Statements

1.0.1 Copyright Statement

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1.0.3 Notice

Every effort was made to ensure that the information in this document was complete and accurate at the time of publication. However, information is subject to change without notice.

1.1 Document Information

1.1.1 Document History

The following chart lists all versions of this document.

Version	Date	Pages Affected	Changes
1.0	12/1/03	All	Initial Publication.
1.1	12/11/03	3, 5, 8, 9, 14, 15	Changes to rules governing adding, replacing and deleting records. Change to description of Free Form Comments.
1.2	12/19/03	7, 8, 9, 10, 11, 12, 13, 14	Changes to description of Opening Position Record and Detail Record. Changes to Appendices A and B. Changes to data quality standards for Symbol, Opening Positions, Trade Date and Non-NYSE Market.
1.3	7/30/04	10, 13, 15	NX comment and editing rules added. Removed rules for editing Contra Badge field. Revised rules for editing the Price and Tick fields.
1.4	11/30/04	5, 9, 17, 18	NX comment clarification, New rules for entering badge numbers, Questionable Items Report, Added new field Opening Comment in Opening Position Record.
1.5	6/6/05	13, 17, 18	Support for PrAON comment. Updated canned comment descriptions.

1.1.2
Contacts

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Chapter 2 Business Requirements

BACKGROUND

NYSE Rule 104A.50 provides, in part, that “Every specialist (including relief specialists) must keep a record of purchases and sales initiated on the Floor (including purchases and sales resulting from commitments or obligations to trade issued from the Exchange through ITS or any other Application of the System), in stocks in which he is registered, for an account in which he has an interest. . . . Specialists and relief specialists are required to report such transactions in such automated format and with such frequency as may be prescribed by the Exchange.” Since early 1993, specialist firms have been submitting reports of their purchases and sales in blocks of one-week periods using an automated format of a Form 81 Report that they have been submitting on a weekly basis to the Exchange for more than fifty years.

In 2001, the Exchange began providing specialist firms with a record of their dealer activity at the end of each trading day in a file known as “Position Minder MRO [machine-readable output]” that is derived from the specialists’ input to the Display Book. The Position Minder MRO file contains all required information plus additional data such as execution times in seconds, contra clearing member, order turnaround numbers, etc. The Position Minder MRO file will be available to the Exchange’s Market Surveillance Division on the morning after trade date (T+1), which is significantly sooner than the current processing cycle for the “automated Form 81”. In view of these advantages, Market Surveillance has decided to replace the “automated Form 81” with the Position Minder MRO. **The specialists’ principal transactions and other events that affect their positions that are captured by the Display Book will no longer need to be reported separately to the Exchange. However, specialists must continue to report their daily opening positions, and may make additions or replacements to the Position Minder MRO data, using this new Specialist Transaction Data Reporting System.** The following is a description of the System.

SYSTEM DESCRIPTION

The Position Minder MRO file will form the basis of the new Specialist Transaction Data system. The file will be the primary source of information for all details with respect to specialist trades. Firms will be required to submit daily opening positions (i.e., dealer, firm investment account, total of personal investment accounts, arbitrage account, and a total for any ordinary accounts) in each of their specialty issues. Firms will also be able to submit additions and replacements (comments only) to the data contained in the Position Minder MRO. The format of the new Specialist Transaction Data file that specialists will be required to submit is contained in this document. It parallels the Position Minder MRO format. The file containing each day’s opening positions should be transmitted to SIAC’s Datatrak system as soon after the NYSE opening as possible, but not later than 11:00 pm on T+1. Additions, replacements and deletions may be submitted by that time as well, but in any event, not later than 11:00 pm on T+3.

Input received from specialists will be validated and merged with the data contained in the Position Minder MRO file and then made available to NYSE Market Surveillance.

Specialists will be able to amend the data initially submitted in the new Specialist Transaction Data file (including opening positions) until 11:00 pm on T+3. Data for multiple trade dates can be submitted in a single file. The remainder of this document describes how to make changes and additions to the original Position Minder MRO data as well as changes and additions to supplementary data that have been previously submitted in the new Specialist Transaction Data file.

DATA VALIDATION

Input received in the new Specialist Transaction Data file will be validated utilizing the rules documented in Appendix C. Specialists will be required to implement the same rules when creating the file. The goal is to prevent errors in the input received from specialists.

ESTABLISHING DATATRAK TRANSMISSION PROCEDURES

In order to establish transmission procedures for the new Specialist Transaction Data file, you must contact SIAC's Client Connectivity Group at 212 383 – 5401. Please identify your request by mentioning Datatrak Sysid 12178.

TESTING REQUIREMENTS

You must conduct a successful test prior to being approved to submit production data. The test will verify connectivity and check the format and content of your test file.

In order to pass a test and be approved to submit production data, test files must contain examples of all record types that pertain to a given member or member organization. The file must also be completely free of errors.

When you are ready to test, please contact SIAC's Client Activation Group at 212 383 – 5401 and identify your request by mentioning Datatrak Sysid 12178.

DATA QUALITY FEEDBACK

You must provide two e-mail addresses to Doris Varnum (dvarnum@nyse.com) at 212 656 – 6773 and Cheryl Ward-Sims (cwardsims@nyse.com) at 212 656 – 5485 to enable a report to be sent to you if you fail to submit opening positions in any registered security by 11:00 pm on T+1 or if any of your submissions are rejected due to the quality of the data (see Appendix C).

Any Questionable Item detected in the Position Minder file, will result in the generation of a Questionable Items Report that will be sent to the specialist firm and NYSE Market Surveillance.

SPECIALIST TRANSACTION DATA FILE DESCRIPTION

The record length for all record types is 160 characters. The first record of the file must be a Datatrak Header record. Following the Datatrak Header record are detail records that contain additions/replacements/deletions to Position Minder MRO data as well as opening positions information. An application trailer record must follow all of the detail records. The last record of the file must be a Datatrak Trailer record. Information for multiple trade dates may be submitted in a single file.

The following chart describes permissible add, replace and delete actions that can be performed from data submitted in the Specialist Transaction Data file.

	POSITION MINDER		SPECIALIST TRANSACTION	
	Opening Position Record	Detail Record	Opening Position Record	Detail Record
ADD	No	No	Yes	Yes
REPLACE	No	Yes – comments only.	Yes	Yes
DELETE	No	No	Yes	Yes

In order to replace a **record type “1”** (opening positions), the contents of the following fields in the Specialist Transaction Data record must exactly match the contents of the original record. If you wish to change any of the four fields listed below, you must delete the original and add a new record.

- | | |
|---------------------------------------|-------------------------|
| 1. Specialist Unit SuperDot (SDOT) ID | 3. Trade Date |
| 2. Security Symbol | 4. Unique Record Number |

In order to replace a Position Minder MRO detail record or a **record type “2”** detail record (see description below) that you have previously added in the Specialist Transaction Data file, or delete a record that you have previously added in the Specialist Transaction Data file, the contents of the following ten fields in the Specialist Transaction Data record must exactly match the contents of the original record. If replacing a Position Minder MRO record, you may only replace the Canned Comment 1, Canned Comment 2 and Free Form Comment fields. If you wish to change any of the fields listed below in an original trade record, you must delete the original record **and** add a new record.

- | | |
|----------------------------|---|
| 1. Specialist Unit SDOT ID | 6. Trade Indicator |
| 2. Security Symbol | 7. Turnaround Code |
| 3. Trade Date | 8. Contra Firm Alpha |
| 4. Time (HHMMSS only) | 9. Contra Badge |
| 5. Link Number | 10. Unique Record ID (This field will be spaces in an original Position Minder MRO record). |

All of the record types are documented below. All alphanumeric (A/N) fields must be left justified and space filled. All numeric (N) fields must be right justified and zero filled. All fields are case sensitive.

**SPECIALIST TRANSACTION DATA REPORTING SYSTEM
DATATRAK HEADER RECORD**

Field Name	Size	Positions	Type	Description
System ID	16	001-016	A/N	HDR.S12178.E00.C (There are two zeros – not the letters “OO” after the “E” above).
Originator	4	017-020	A/N	Identifies organization sending the file. If you are currently submitting Form 81 data to SIAC (Datatrak Sysids 12177 or 32177), you must utilize the same originator code. Otherwise, please call 212 383 – 8327 or 212 383 – 2003 for assignment.
Filler	2	021-022	A/N	.S
Sub-Originator	4	023-026	A/N	Identifies organization sending the file. If you are currently submitting Form 81 data to SIAC (Datatrak Sysids 12177 or 32177), you must utilize the same sub-originator code. Otherwise, please call 212 383 – 8327 or 212 383 – 2003 for assignment.
Date	8	027-034	A/N	Date of file submission. MMDDYYYY
Description	25	035-059	A/N	NYSE SPECIALIST TRADES
Filler	101	060-160	A/N	Space

SPECIALIST TRANSACTION DATA REPORTING SYSTEM

OPENING POSITIONS RECORD

An Opening Positions record must be submitted for each specialty issue for each business day.

Field Name	Size	Positions	Type	Description
Specialist Unit	3	001-003	N	SDOT assigned specialist unit number.
Clearing Number	4	004-007	N	Specialist clearing agent's number.
Security Symbol	11	008-018	A/N	Listed security symbol.
Record Type	1	019-019	N	1 = Opening Position Record
Opening Dealer Position	9	020-028	N	Opening dealer position.
Opening Dealer Position Sign	1	029-029	N	Sign of the opening dealer position. 0 = Short, 1 = Long
Opening Firm Investment Position ("FIV")	9	030-038	N	Opening position (number of shares) in the firm's investment account.
Opening FIV Sign	1	039-039	N	Sign of the opening firm investment position. 0 = Short, 1 = Long
Opening Personal Investment Position ("PIV")	9	040-048	N	Opening position (total number of shares) for all personal investment accounts.
Opening PIV Sign	1	049-049	N	Sign of the opening personal investment position. 0 = Short, 1 = Long
Opening Arbitrage Position	9	050-058	N	Opening position (number of shares) in any arbitrage account.
Opening Arbitrage Position Sign	1	059-059	N	Sign of the arbitrage opening position. 0 = Short, 1 = Long
Opening Ordinary Position	9	060-068	N	Number of shares in the ordinary account.
Opening Ordinary Position Sign	1	069-069	N	Sign of the ordinary opening position. 0 = Short, 1 = Long
Filler	2	070-071	A/N	Spaces.
Trade Date	8	072-079	A/N	Activity date – CCYYMMDD.
Opening Comment	50	80-129	A/N	Provides a facility for the specialist to enter a comment if the STDRS opening position differs from the Position Minder Opening Position for reasons other than discrepancies due to odd-lots.
Filler	21	130-150	A/N	Spaces.
Update Indicator	1	151-151	A/N	R = Replace previously submitted record with this record. A = Add this record. D = Delete previously submitted record.
Unique Record ID	9	152-160	A/N	When adding a record, a unique (within symbol and trade date) identifier of this

Field Name	Size	Positions	Type	Description
				record assigned by the specialist.

SPECIALIST TRANSACTION DATA REPORTING SYSTEM

ADD / REPLACE / DELETE DETAIL RECORD

Field Name	Size	Positions	Type	Description
Specialist Unit	3	001-003	N	SDOT assigned specialist unit number.
Clearing Number	4	004-007	N	Specialist clearing agent's number.
Security Symbol	11	008-018	A/N	Listed security symbol.
Record Type	1	019-019	N	2 = Detail Record.
Time	6	020-025	N	Military Time – HHMMSS (NY time). See Appendix C for more information.
Filler	2	026-027	A/N	Spaces.
Clearing Firm	4	028-031	A/N	Specialist clearing agent's alpha.
Side	1	032-032	A/N	"B" = Buy, "S" = Sell
Quantity	7	033-039	N	Number or shares.
Price Code	1	040-040	A/N	"0" thru "9" and "A", "B", "C" = Number of decimal places for decimal price.
Price	12	041-052	N	Price value – Decimal Price (floating decimal indicated by Price Code Field).
Filler	10	053-062	A/N	Spaces.
Contra Firm Alpha	4	063-066	A/N	Contra clearing firm alpha or OLA.
Contra Badge	4	067-070	A/N	Contra badge number. (Spaces when OLA).
Tick	1	071-071	A/N	"1" = 0- "2" = 0+ "3" = - "4" = + Space = No tick
Trade Date	8	072-079	A/N	Date the position was affected – CCYYMMDD.
Canned Comment 1	5	080-084	A/N	See Appendix A for values. Not case sensitive.
Canned Comment 2	5	085-089	A/N	See Appendix A for values. Not case sensitive.
Free Form Comment	10	090-099	A/N	Free form comment. Must not be one of the Canned Comments (exception: NX is allowed). Must be the badge number(s) of the Floor Official(s) if Canned Comment 1 or 2 is 'FO'. Badge numbers must be 1-4 digits. Multiple badge numbers must be separated by spaces.
Trade Indicator	1	100-100	A/N	Space = DBK reported trade or OLA. M = Manual trade. X = SAX reported trade.
Filler	1	101-101	A/N	Space.
Settlement Terms	3	102-104	A/N	"CA" = Cash "ND" = Next Day

Field Name	Size	Positions	Type	Description
				nnn = # of days Seller's Option (002-180). Space = Regular Settlement
Turnaround Code	6	105-110	A/N	SDOT assigned turnaround number.
Link Number	5	111-115	N	SDOT assigned linking number.
Filler	33	116-148	A/N	Spaces.

SPECIALIST TRANSACTION DATA REPORTING SYSTEM

ADD / REPLACE / DELETE DETAIL RECORD (continued)

Field Name	Size	Positions	Type	Description
Non-NYSE Market	2	149-150	A/N	Populate for trades effected in markets other than the NYSE. Otherwise, set to spaces. See Appendix B for values.
Update Indicator	1	151-151	A/N	“R” = Replace previously submitted record or a record on the Position Minder MRO with this record. “A” = Add this record. “D” = Delete previously submitted record.
Unique Record ID	9	152-160	A/N	When adding a record, a unique (within symbol and trade date) identifier of this record assigned by the specialist.

SYSTEM TRAILER RECORD

Field Name	Size	Positions	Type	Description
Text	7	001-007	A/N	“TRAILER”
Record Count	9	008-016	N	Count of all records excluding the Datatrak Header and Datatrak Trailer records.
Filler	144	017-160	A/N	Spaces.

DATATRAK TRAILER RECORD

Field Name	Size	Positions	Type	Description
System ID	16	001-016	A/N	END.S12178.E00.C (There are two zeros – not the letters “OO” after the “E” above).
Originator	4	017-020	A/N	Same value as in the Datatrak Header Record.
Filler	2	021-022	A/N	.S
Sub-Originator	4	023-026	A/N	Same value as in the Datatrak Header Record.
Filler	134	027-160	A/N	Spaces.

**APPENDIX A
CANNED COMMENT ABBREVIATIONS**

Abbr.	Description
A/O	"AS OF" trade; Free-Form Comment field contains date.
ARB	Trade effected for arbitrage purposes; free-form comment contains name of arbitrated preferred stock or bond.
C	Cash non-regular way transaction.
CNVUS	NYSE-listed ADRs/ADSs were added to (with Buy indicator) the Dealer account due to the conversion of foreign ordinary shares into NYSE-listed ADRs/ADSs OR NYSE-listed ADRs/ADSs were removed from (with Sell indicator) the Dealer account due to their conversion into foreign ordinary shares.
CONV	Conversion of a convertible issue into common stock.
CXL	Cancelled trade.
E	Error trade.
FIV	Transaction was effected directly for a <u>firm</u> investment account.
FMT	Dealer position adjustment for a trade occurring in a non-US Market (excluding a trade in an ordinary security that underlies an NYSE-listed ADR/ADS).
FMTU	Trade occurred in a non-U.S. market in an ordinary security that underlies an NYSE-listed ADR/ADS.
FOC	Foreign ordinary shares were removed from (with Sell indicator) the " Ordinary " account due to their conversion into NYSE-listed ADRs/ADSs OR foreign ordinary shares were added to (with Buy indicator) the " Ordinary " account due to the conversion of NYSE-listed ADRs/ADSs into foreign ordinary shares.
FO	Floor official approval of the trade was obtained.
HFBID	Specialist sold only half the stock wanted on the book.
HFOFR	Specialist purchased half the stock offered on the book.
II	ITS order was received from an ITS participant and was executed on the NYSE.
IO	ITS order was sent to another ITS participant and executed away from the NYSE.
INV	Transfer shares to the firm investment account at a later date.
LVS	Stock left on the book at the bid or offer following a dealer sale or purchase; Use the Free Form Comment field to indicate the number of shares remaining on the book, e.g., "2700".
ND	'Next day' settlement non-regular way transaction.
NSA	"Not substantially all"; specialist left a reasonable amount of stock in the quote quantity.
NX	Specialist was the contra to a Direct+ order in a destabilizing manner because the bid or offer against which the order was directed was filled or cancelled.
OHT	Off hours trade (Crossing Session I).
OLA	Odd lot alarm was received by the specialist.
OLADJ	End-of-day adjustment to dealer position due to an Odd Lot imbalance.
ONBID	Specialist purchased stock on the bid.
ONOFR	Specialist sold stock on the offer.
PAR	Trade price brings the issue closer to parity with a companion issue. (Typically a destabilizing trade.)
PIV	Transaction was effected directly for a <u>personal</u> investment account.
PRAHD	Specialist acknowledges that he/she traded ahead of a Display Book order.
PRAON	Specialist acknowledges that he/she traded ahead of an "all or none" order.
RGMKT	Trade effected on a U.S. exchange or domestic OTC when the NYSE is not open.
RLF	Reliquification of position.
S	Sellers option non-regular way transaction.
SEX	Short sale that is exempt from the short selling rule.
SPR	Adjustment of principal trade to agency trade.
TARB	Transfer to arbitrage account.
TFIV	Transfer to firm investment account.
TPIV	Transfer to personal investment account.

APPENDIX B NON-NYSE MARKETS

<u>Country Code</u>	<u>Country</u>	<u>Country /Exch. Code</u>	<u>Country</u>
AR	ARGENTINA	NO	NORWAY
AT	AUSTRIA	NZ	NEW ZEALAND
AU	AUSTRALIA	PE	PERU
BA	BERMUDA	PH	THE PHILIPPINES
BB	BARBADOS	PK	PAKISTAN
BE	BELGIUM	PT	PORTUGAL
BR	BRAZIL	SE	SWEDEN
CA	CANADA	SG	SINGAPORE
CH	SWITZERLAND	TH	THAILAND
CL	CHILE	TR	TURKEY
CN	CHINA, PEOPLE'S REP. OF	TT	TRINIDAD & TOBAGO
CO	COLOMBIA	TW	TAIWAN
CR	COSTA RICA	VE	VENEZUELA
DE	GERMANY	YU	YUGOSLAVIA
DK	DENMARK	ZA	SOUTH AFRICA
EC	ECUADOR	XX	Other
ES	SPAIN		
FI	FINLAND		UNITED STATES OF AMERICA
FR	FRANCE		If trade was executed in a U.S. market, use the
GB	UNITED KINGDOM		U.S. Exchange Codes below.
GR	GREECE	A	American Stock Exchange
HK	HONG KONG	B	Boston Stock Exchange
HU	HUNGARY	C	National Stock Exchange
ID	INDONESIA	D	NASD ADF
IE	IRELAND	I	International Securities Exchange
IL	ISRAEL	M	Chicago Stock Exchange
IN	INDIA	P	Pacific Stock Exchange
IT	ITALY	T	NASDAQ
JM	JAMAICA	W	CBOE
JO	JORDAN	X	Philadelphia Stock Exchange
JP	JAPAN		
KE	KENYA		
KR	KOREA, REP. OF		
KW	KUWAIT		
LK	SRI LANKA		
LU	LUXEMBOURG		
MX	MEXICO		
MY	MALAYSIA		
NG	NIGERIA		
NL	THE NETHERLANDS		

**APPENDIX C
DATA QUALITY STANDARDS**

The following describes the formatting rules that submitters of the Specialist Transaction Data file must adhere to when creating the file. All of the editing rules apply to all of the submissions, whether they are Replacements (R), Additions (A), or Deletions (D).

All alphanumeric (A/N) fields must be left justified and space filled. All numeric (N) fields must be right-justified and zero filled. All fields are case sensitive.

Opening Positions Record

1.	Specialist Unit	Must be numeric and a valid Specialist Unit SDOT ID.
2.	Specialist Unit Clearing Number	Must be numeric.
3.	Security Symbol	Must be valid for the combination of Specialist Unit SDOT ID and Trade Date.
4.	Record Type	Must equal '1'.
5.	The Five Opening Position Fields	Must be numeric.
6.	The Five Opening Position Sign Fields	Must be '0' or '1'. If an Opening Position is zero, the Position Sign must be '1'.
7.	Trade Date	Must be a valid business date within the last 3 business days.
8.	Update Indicator	Must equal 'R', 'A', or 'D'.
9.	Unique Record ID	Must not be spaces.
10.	If the Update Indicator equals 'R' or 'D', the four key fields must match a previously submitted record. Two records with the same key fields are not allowed.	
11.	If the Update Indicator equals 'A', the Unique Record ID must be unique within the Security Symbol and Trade Date.	

Detail Record

1.	Specialist Unit	Must be numeric and a valid Specialist Unit SDOT ID.
2.	Specialist Unit Clearing Number	Must be numeric.
3.	Security Symbol	Must be valid for the combination of Specialist Unit SDOT ID and Trade Date.
4.	Record Type	Must equal '2'.

**APPENDIX C
DATA QUALITY STANDARDS**

Detail Record (continued)

5.	Time	Must be a valid time in military time format (HHMMSS). If Canned Comment 1 or 2 contains 'OHT' you must use an actual time that is within five minutes of the Crossing Session I transaction.
6.	Clearing Firm	Must be the alpha representation of the specialist firm's clearing number.
7.	Side	Must be 'B' or 'S'.
8.	Quantity	Must be numeric and not equal to zero.
9.	Price Code	Must equal 0 – 9 or A, B, C. Space is permitted if Canned Comment 1 or 2 contains a remark that does not require a price.
10.	Price	Must be numeric. May be zero only if Canned Comment 1 or 2 contains 'CNVUS', 'CONV', 'FOC', 'OLA', 'OLADJ', 'RGMKT', 'TARB', 'TFIV' or 'TPIV'. If Canned Comment 1 or 2 contains 'FMT', Price may be zero only if the data originated in the Position Minder File.
11.	Contra Firm Alpha	Must equal 'OLA' if Canned Comment 1 or 2 contains 'OLA'.
12.	Contra Badge	No editing performed.
13.	Tick	Must equal '1', '2', '3', '4' or space.
14.	Trade Date	Must be a valid business date within the last 3 business dates. If Canned Comment 1 or 2 contains 'FMT', 'FMTU' or 'FOC', must be a valid date within 6 calendar days.

**APPENDIX C
DATA QUALITY STANDARDS**

Detail Record (continued)

15.	Canned Comment 1 and 2	<p>Must be spaces or one of the valid comments contained in Appendix A. The field is not case sensitive.</p> <p>If Canned Comment 1 or 2 contains 'FMTU' or 'FOC', the submitted record must be an Add or a replacement of a previous Add.</p> <p>If Canned Comment 1 or 2 contains 'OHT' you must use an actual time that is within five minutes of the Crossing Session I transaction.</p> <p>The Canned Comments 'PRAHD' and 'PRAON' cannot be Added or Replaced.</p>
16.	Free Form Comment	<p>Must not be one of the Canned Comments if Canned Comment 1 or 2 are spaces. Must be the badge number(s) of the Floor Official(s) if Canned Comment 1 or 2 is 'FO'. Badge numbers must be 1 to 4 digits. Multiple badge numbers must be separated by spaces.</p> <p>Exception: NX is allowed as a Free Form Comment</p>
17.	Trade Indicator	Must equal space, 'M', or 'X'.
18.	Settlement Terms	Must equal spaces, 'CA', 'ND', or a three-digit number (002 – 180) indicating the number of seller's option days.
19.	Turnaround Code	No edit rules.
20.	Link Number	Must be numeric.
21.	Non-NYSE Market	If Canned Comment 1 or 2 is 'FMT' or 'FMTU', then must be one of the Country Code values in Appendix E. If Canned Comment 1 or 2 is 'RGMKT' then, must be one of the exchange codes in Appendix B. Otherwise, must equal spaces.
22.	Update Indicator	Must equal 'R', 'A', or 'D'.
23.	Unique Record ID	Must not be spaces if the Update Indicator is 'A'.
24.	If Update Indicator equals 'R', the ten key fields must match an original Position Minder record or a previously submitted record. Two records with the same key fields are not allowed.	
25.	If Update Indicator equals 'R', and the ten key fields match an original Position Minder record, only the 3 comment fields may be updated.	
26.	If Update Indicator equals 'D', the ten key fields cannot match an original Position Minder record. They must match a previously submitted record.	

**APPENDIX C
DATA QUALITY STANDARDS**

Detail Record (continued)

27.	If Update Indicator equals 'A', the Unique Record ID must be unique within Security Symbol and Trade Date. The ten key fields must not match the same fields in the Position Minder MRO file or a previously entered record.								
28.	If Canned Comment 1 or 2 equals 'PRAHD', then you may not replace any of the fields in the original record except for the Free Form Comment field.								
29.	You may not replace an original Position Minder MRO record that did not contain 'NX' in Canned Comment 1 or 2 with a record that contains this comment. You also may not add a record containing this comment.								
30	<p>A Questionable Items Report will be sent to a Specialist Firm in the event any of the following conditions are met based upon the evaluation of Position Minder File records.</p> <table border="0" style="width: 100%;"> <thead> <tr> <th style="text-align: left;">Questionable Item</th> <th style="text-align: left;">Rationale</th> </tr> </thead> <tbody> <tr> <td>Manual Trade-Requires Comment</td> <td>A comment must be supplied in Canned Comment fields 1 or 2 if the Trade Indicator field equals "M" (manual trade) and the Contra Firm Alpha field equals "NON".</td> </tr> <tr> <td>Missing FO Badge</td> <td>Canned Comment 1 or 2 contained "FO" and the Free Form Comment field contained spaces.</td> </tr> <tr> <td>Invalid FO Badge</td> <td>Canned Comment 1 or 2 contained "FO" and the Free Form Comment field contained at least one invalid Floor Official badge number.</td> </tr> </tbody> </table>	Questionable Item	Rationale	Manual Trade-Requires Comment	A comment must be supplied in Canned Comment fields 1 or 2 if the Trade Indicator field equals "M" (manual trade) and the Contra Firm Alpha field equals "NON".	Missing FO Badge	Canned Comment 1 or 2 contained "FO" and the Free Form Comment field contained spaces.	Invalid FO Badge	Canned Comment 1 or 2 contained "FO" and the Free Form Comment field contained at least one invalid Floor Official badge number.
Questionable Item	Rationale								
Manual Trade-Requires Comment	A comment must be supplied in Canned Comment fields 1 or 2 if the Trade Indicator field equals "M" (manual trade) and the Contra Firm Alpha field equals "NON".								
Missing FO Badge	Canned Comment 1 or 2 contained "FO" and the Free Form Comment field contained spaces.								
Invalid FO Badge	Canned Comment 1 or 2 contained "FO" and the Free Form Comment field contained at least one invalid Floor Official badge number.								
31	If Canned Comment 1 or 2 equals 'PRAON', then you may not replace any of the fields in the original record except for the Free Form Comment field.								