FINANSTILSYNET

IT solution for reporting MiFIR Transactions

10-05-2017 - Finanstilsynet

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Agenda

1. Test
   - Test overview
   - Test time schedule
   - Registration for test
   - Test cases
   - Known defects
2. FTP-server
   - Security set-up and information
3. Recap and recommendations
4. Information and communication
5. AOB

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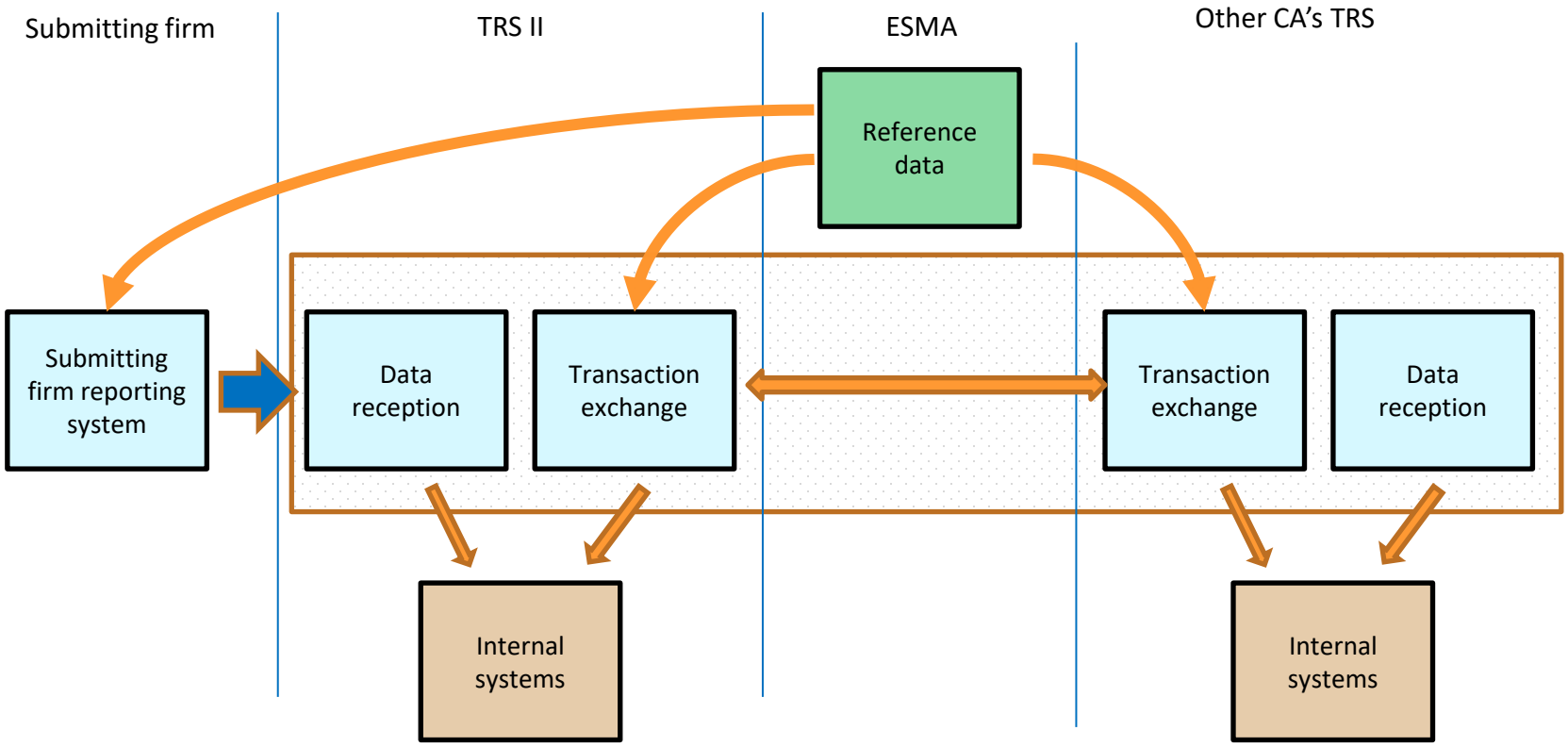
1. System overview



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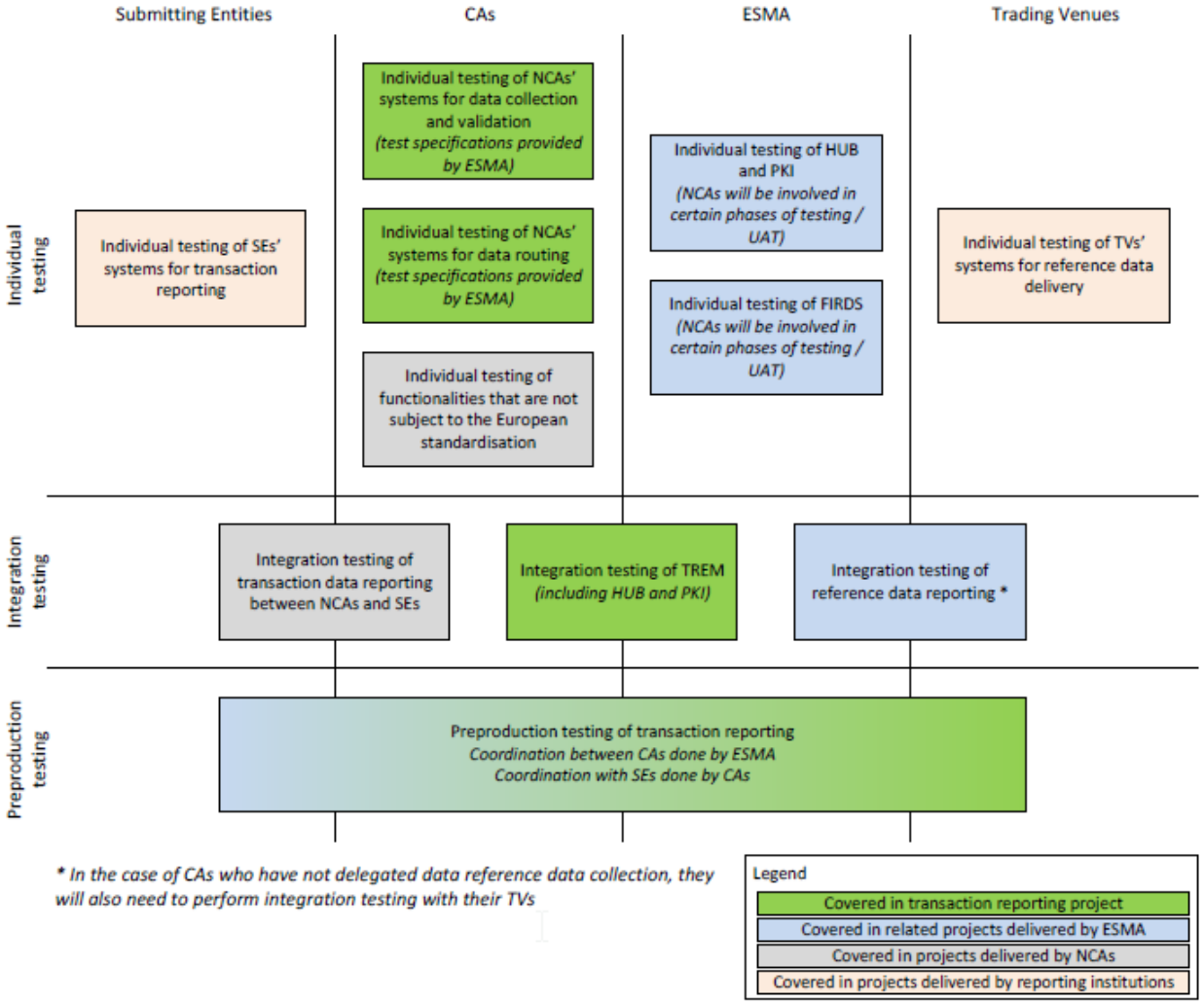
1. ESMA - Test overview



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1. TRS II Expected release plan

Release 1

- The TRS II is ready for external testing by submitting entities. They are able to send and receive data. May include validation based on reference data created by the project
- **Maj 2017**

Release 1,5

- The TRS II is ready for testing exchange of data with other competent authorities and for receiving reference data from ESMA
- **September 2017**

Release 2

- The TRS II is ready to comply with EU regulations
- **November 2017**

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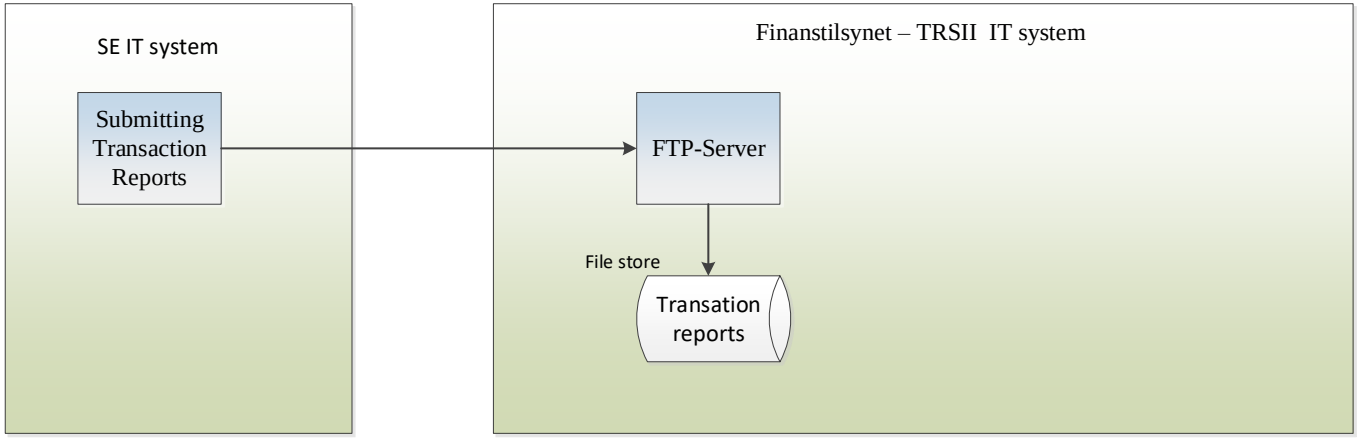
1.Test Expected Time Schedule

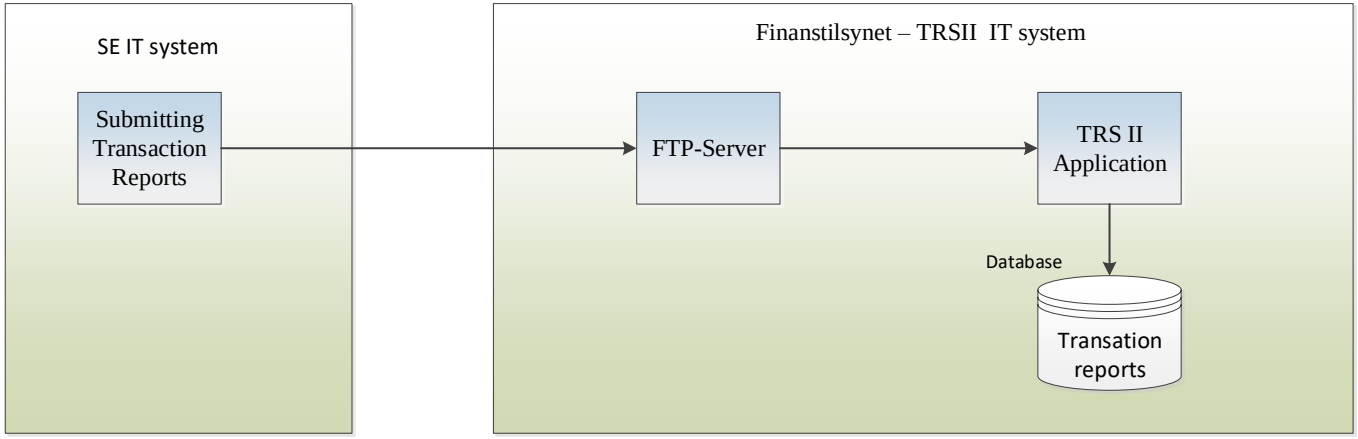
Release	Start date	End date	Test
1	May 2017	Sep. 2017	Part 1: Test of connection FTP-server Part 2: Test of validation of transaktion reports
1.5	Sep. 2017	Nov. 2017	Test with reference data from ESMA (if available)
2	Nov. 2017	Dec. 2017	A: Test of production release B: Pre-production with production data
	03-01-2018	-	Go-live, Production

1. Test - Release 1

Test Part 1 – Connetion to FTP-server



Test Part 2 – Validation af transaktion reports



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1. Reference data for Release 1 test

- In Release 1 we do not have connection to ESMA's FIRDS system and we will therefore strive to include the most common Danish instruments, LEI, MIC etc.

- ESMA's plan is to go live with FIRDS July 2017

- Once FIRDS is up and running at ESMA with good data quality then TRSII will use the reference data supplied by FIRDS.

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1.Test plan - Release 1

Start date	End date	Test
29-05-2017	01-09-2017	Part 1: Test of connection to FTP-server
15-06-2017	01-09-2017	Part 2: Test of validation of transaktion reports
01-07-2017	07-08-2017	Summer vacation – no support from Finanstilsynet or BEC
September		Send test report for release 1 to all

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1. Registration for test and production

Registration for test is done by:

1. Read instruction
2. Fill in the registration form
3. Send registration form to Finanstilsynet by email
4. Send SSH key pairs to BEC via email

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1. Test Cases

We have prepared test cases that we will ask you to perform

1. Test cases for Release 1 is made and ready
2. Test cases for Release 1.5 and 2 will be published later

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1. Known defects

- Feedback file doesn't adhere to xsd. Two problems:
  - A simple one that will be fixed asap.
  - A more complex one: the name of the files are too long to fit into the 35 character limitation by ESMA. Eg.

<BizMsgIdr>FF_TR_353800XVAQXELVCPC871_01_20170407_0092_01</BizMsgIdr>

47 character long.

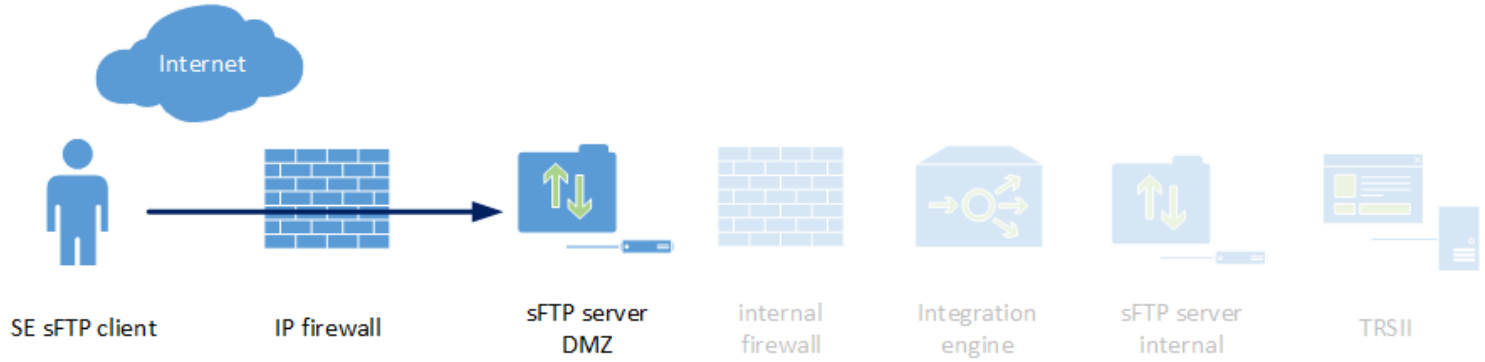
Will be shortened.

Not sure how - maybe remove LEI code.

eg. <BizMsgIdr>FF_01_20170407_0092_01</BizMsgIdr>

- Transaction identification in feedback file only uses Transaction reference number. It should be a concatenation of Executing Entity LEI and the Transaction reference number.

2. FTP setup - overview



- Upload to / download from TRSII via sFTP
  - Access via Internet; but servers not publicly available
    - Source IP needed for firewall opening
  - Server supports sftp and scp
    - SSH File Transfer Protocol / Secure File Transfer Protocol
    - Secure Copy Protocol
  - Both protocols uses SSH (Secure Shell) to provide encrypted safe transfer of files.
  - Uses symmetric encryption, asymmetric encryption and hashes to secure transfer

3. Recap

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- Keep reporting despite of missing feedback files.
- SE must ensure that all feedback files are analysed and all reports are corrected
- We urge you not to send production data to the test environment due to security levels
  - Security levels are not the same as production
  - Transactions could be exchanged with other countries
- It is required that the same reference number is re-used for the changes and updates to the same trade.
- Two test environments will be available. One which will resemble the production environment and one that will have the latest release due to be implemented in production.

3. Recap

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- You must delete feedback files from the ftp-folder: Incoming, after you have downloaded and read them.
- All Transaction files must be ZIP'ed.

3. Recommendation

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Considerations concerning size, timing and frequency of reporting:

- Reference data is published in the morning.
- TR from day T cannot be validated until T+1 after reference data is processed
- Avoid sending too many files (>10) pr day
- One TR per submitted file is no-go unless that is the daily production
- Avoid sending very big files (>10MB unzipped)

3. Recommendation

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- A Submitting Entity can include TR from different Executing Entities in one file. So number of files can be limited for ARMs.
- It is recommended not to send a new file before feedback from a previous file has been received. This will ease the bookkeeping and avoid double reporting and cancellation. Exception is if TRS is down and SE are obliged to keep reporting.
- The files are limited not to exceed 500.000 transactions.

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4. Communications and information from Finanstilsynet

- We continuously update our website and we would ask you to get updated information here (*http://www.finanstilsynet.dk/da/Lovgivning/Information-om-udvalgte-tilsynsomraader/MiFIR-TRS*)

- Direct questions to MiFIR-TRS@ftnet.dk

- Mailing list – ensure you are on the mailing list – preferably using a shared mail.
  - Send any changes to MiFIR-TRS@ftnet.dk

4. Communications and information from Finanstilsynet

Information about the TRSII will be published on our webpage or send to your email

- Known defects and when they are solved
- Service window
- New test cases
- Information about reference data
- Upgades of the IT-system TRSII
- Next test periode
- Questions and Answers

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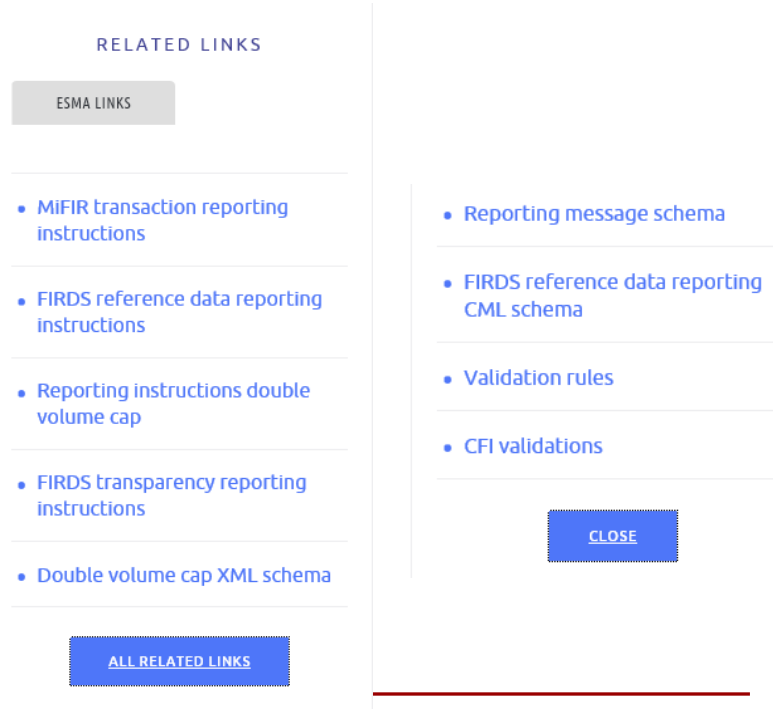
4. Information from ESMA

- ESMA:

  https://www.esma.europa.eu/policy-rules/mifid-ii-and-mifir/mifir-reporting-instructions

  Expand links below to get

  eg. Reporting message schema



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5. AOB