

# DTCC Institutional Trade Processing (ITP) Archival Services FAQ

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## DOES ITP HAVE RECORDKEEPING SERVICES TODAY?

Yes, ITP has an archival service, Confirm Archive, for any subscriber of CTM® and TradeSuite ID®.

If a subscriber to CTM and TradeSuite ID wishes to utilize Confirm Archive, it must elect such service to view its records. ITP archival services are designed to permit SEC-registered broker-dealers and investment adviser to store trade confirmations in a manner compliant with applicable regulatory requirements.

## WHAT IS CHANGING WITH THE SHIFT TO T+1?

As part of the rulemaking package for the shift to T+1 settlement, the SEC expanded the Advisers Act recordkeeping requirement (Rule 204-2) for a U.S. Registered Investment Advisor. The amended language adds the following language to section (a)(7)(iii):

*and, for any transaction that is subject to the requirements of § 240.15c6-2(a) of this chapter, each confirmation received, and any allocation and each affirmation sent or received, with a date and time stamp for each allocation and affirmation that indicates when the allocation and affirmation was sent or received.*

The existing requirement to maintain communications relating to “the placing or execution of any order to purchase or sell any security.” is still in effect. The amendment takes effect **May 28, 2024**.

## WILL ITP'S ARCHIVAL SERVICES BE UPDATED TO MEET THE CHANGES TO RULE 204-2 FOR U.S. REGISTERED INVESTMENT ADVISORS?

Yes, ITP's archival services are being updated to meet the amended recordkeeping requirement under Rule 204-2. U.S. Registered Investment Advisors have the option to utilize a new ITP archival service, Trade Archive.

## Trade Archive For Institutional Clients

### WHAT IS TRADE ARCHIVE?

Trade Archive is designed for institutional clients who are paying subscribers to CTM and/or TradeSuite ID. Trade Archive is launching on May 15<sup>th</sup>, ahead of the U.S. T+1 effective date. Trade Archive will maintain trade records from both CTM and TradeSuite ID in a centralized cloud-based system on a go-forward basis post launch and retain the required trade information inclusive of timestamps.

- Trade records archived from CTM will include the CTM allocation and confirmation timestamps along with trade details from CTM.
- Trade records from TradeSuite ID will include the TradeSuite ID confirmation and affirmation timestamps along with confirmation and affirmations details from TradeSuite ID. Institutional clients will have the ability to log in via MyDTCC to access the archive, search for trade records, as well as view and download trade information.

## WHO CAN ACCESS TRADE ARCHIVE?

Trade Archive will be offered to institutional clients (paying subscribers of CTM and/or TradeSuite ID). Please see our [TradeSuite ID Number and Subscriptions FAQ](#) for more information on availability for clients with different subscription types to TradeSuite ID.

## HOW MUCH DOES TRADE ARCHIVE COST?

Trade Archive is offered at no additional cost.

## IS TRADE ARCHIVE REPLACING CONFIRM ARCHIVE?

No, Confirm Archive (for both CTM and TradeSuite ID) will continue to function as it does today with no changes. CTM Confirm Archive captures the Trade Detail timestamp as part of the CTM record and TradeSuite ID Confirm Archive captures confirmation and affirmation timestamps. Confirm Archive is available to all client types.

## WHAT ARE THE BENEFITS OF USING TRADE ARCHIVE?

- Institutional clients that leverage CTM for central matching and TradeSuite ID for processing their trades, can independently search and retrieve the archived CTM and TradeSuite ID records from one central location.
- Trade Archive user interface (UI) will support robust sorting and filtering on trade attributes in a grid to quickly narrow down trade records of interest.
- Information on timestamps for the records will be available for viewing in a grid layout and download– this enables quick access to timestamp information without having to retrieve and view each individual trade archival record in Confirm Archive.
- Records can be downloaded in a CSV format.
- An added benefit for clients that leverage Match 2 Instruct (M2i) workflows is that they can perform a single search under their CTM BIC and view the allocation, confirmation, and affirmation details together for their M2i trades in a collated view.

## WHAT ARE SOME OF THE DIFFERENCES BETWEEN TRADE ARCHIVE AND CONFIRM ARCHIVE?

KEY CONSIDERATIONS	CONFIRM ARCHIVE <i>current recordkeeping solution</i>	TRADE ARCHIVE <i>*new capability – available May 15<sup>th</sup></i>
<b>Client Type</b>	<a href="#">TradeSuite Confirm Archive</a> is available to Institutions, Agents, Brokers, Interested Parties and Investment Manager Outsourcers. <a href="#">CTM Confirm Archive</a> is available to Institutions, Investment Manager Outsourcers and Executing Brokers.	Trade Archive will be available to Institutions and Investment Manager Outsourcers.
<b>Record Type</b>	<a href="#">TradeSuite Confirm Archive</a> – TradeSuite ID records <a href="#">CTM Confirm Archive</a> – CTM Records	Both CTM and TradeSuite ID records, as applicable depending on client's underlying records
<b>Scope of Trades</b>	Global	U.S. Only
<b>Access to Historical Records</b>	Confirm Archive will continue to archive trade information with no changes for the foreseeable future, so can be used to access historical as well as new activity.	The new Trade Archive solution will centrally archive and store trade lifecycle records from both CTM and TradeSuite in one central location on a <b>go-forward basis post launch</b> . Any information on historical trades (trades archived before the launch of Trade Archive) will not be available in Trade Archive.

KEY CONSIDERATIONS	CONFIRM ARCHIVE <i>current recordkeeping solution</i>	TRADE ARCHIVE <i>*new capability – available May 15<sup>th</sup></i>
<b>Archival Timeframe</b>	Once subscribed to Confirm Archive, each record will be retained for 10 years from the transaction date.	Once provisioned to Trade Archive, each record will be retained for 10 years from transaction date or until the date the subscription to CTM and/or TradeSuite ID is active, whichever is earlier.
<b>Search &amp; Download Capability</b>	<p>CTM records and TradeSuite ID records are searchable via CTM Confirm Archive and TradeSuite ID Confirm Archive respectively.</p> <p>Confirm Archive supports a print image format that can be downloaded in a text format.</p>	<p>Within Trade Archive, a user can search for transactions using a CTM BIC or TradeSuite ID.</p> <p>Transactions matching the search criteria are presented in a grid, with the ability to easily sort and filter transactions of interest and download information.</p> <p>Trade Archive will support a CSV download format.</p>
<b>Trade Availability in Archival Service</b>	<p><u>TradeSuite ID Confirm Archive</u> – Confirms (and updates to Confirms) are available 1 day after process date in TradeSuite.</p> <p><u>CTM Confirm Archive</u> – CTM trades are available in CTM UI for 16 weeks after Trade Date and subsequently archived and available from CTM Confirm Archive.</p>	2 days after Trade Date
<b>Data Refresh</b>	<p>TradeSuite ID Confirm Archive - Every 24 hours</p> <p>The latest information on CTM trades is available on the CTM UI for 16 weeks.</p>	Every 24 hours
<b>Access if Client is no longer a subscriber to TradeSuite ID or CTM</b>	Available for the remainder of the relevant record retention period.	None. Clients must download their trade records prior to terminating the CTM or TradeSuite ID subscription.

## WHAT TIMESTAMP INFORMATION IS AVAILABLE IN TRADE ARCHIVE?

Once provisioned to the relevant CTM BICs and TradeSuite IDs, clients can independently search for either TradeSuite ID Confirms associated with a TradeSuite ID or CTM trade records associated with a CTM BIC. All timestamps on the Trade Archive UI will be displayed in EST / EDT time zone.

For a TradeSuite confirm record displayed in response to a search, the following timestamps are visible on the grid, as well as available for download.

- Confirmation Submission Timestamp
- Affirmation Timestamp
- Confirmation Last Updated timestamp & description
  - Captures the timestamp for the last update made to the confirm. For example, if the confirm was subsequently canceled after submission, this value will differ from the confirm submission timestamp and capture the timestamp for that cancellation.
- Affirmation Last Updated timestamp & description
  - Captures the timestamp for the last update made to the affirmation. For example, if an affirmed confirm was reverse affirmed or disaffirmed, this value will differ from the affirmation timestamp and capture the timestamp for the reverse affirmation or disaffirmation.

For a CTM trade record displayed in response to a search, the following timestamps are visible on the grid, as well as available for download.

If the CTM trade record is for a non-M2i trade (non-USDx), we have the CTM allocation and confirmation information available.

- Allocation Submission Timestamp (IM CTM Trade Detail record received)
- Confirmation Submission Timestamp (Broker TM Trade Detail record received)
- Match Agreed Timestamp
- Allocation Last updated timestamp & description
  - *Captures the timestamp for the last update made to the IM's Trade Detail record. For example, in cases where the IM Trade Detail was amended or force matched or canceled.*
- Confirmation Last updated timestamp & description
  - *Captures the timestamp for the last update made to the Broker's Trade Detail record. For example, in cases where the Broker Trade Detail was amended or canceled.*


If the CTM trade record is an M2i (USDx) trade, we will provide a holistic collated view into the allocation, confirmation and affirmation details based on details from the CTM trade record and the corresponding TradeSuite confirm record as we are able to link the CTM trade record to the TradeSuite Confirm behind the scenes by leveraging the DTC Control Number that's available on the CTM trade record for M2i trades.

## HOW DO INSTITUTIONAL CLIENTS ACCESS TRADE ARCHIVE?

Whether additional paperwork is required for accessing Trade Archive depends on your TradeSuite ID subscription.

- For institutional clients of CTM and TradeSuite ID Web (full access), their organizations will be auto provisioned on launch.
- CTM clients who have TradeSuite ID Direct / TradeSuite ID Limited subscriptions will need to fill out an onboarding form that specifies the CTM BIC and the corresponding TradeSuite ID numbers in use by the same legal entity to get those TradeSuite IDs additionally set up. This will enable the ability to search for TradeSuite ID confirms within those TradeSuite IDs. Archival commences on system launch – so, once set up, clients can retrieve CTM and TradeSuite ID records with trade date from mid-May and beyond.
- TradeSuite ID Limited and TradeSuite ID Direct clients that do not use CTM today are not paying subscribers to our services and will not have access to Trade Archive.
- Investment Manager Outsourcers who are subscribers of CTM and TradeSuite ID today and own the BICs / TradeSuite ID numbers that are used to manage trade operational for their clients. They will have access to Trade Archive for those subscribed organizations and can use the information available to service their clients.
- Underlying clients of Investment Manager Outsourcers who do not directly subscribe to CTM or TradeSuite ID themselves and do not have access to CTM or TradeSuite ID today will not have access to Trade Archive.

Once organizations are provisioned, user credentialing will be managed by the Product Administrators for these organizations, consistent with the process we follow for other ITP Services.



## HOW DOES CLIENT USAGE OF CTM AND TRADESUITE IMPACT WHAT INFORMATION IS AVAILABLE IN TRADE ARCHIVE?

INSTITUTION / BUY SIDE USE CASES	TRADE ARCHIVE DATA ACCESS	
SUBSCRIPTIONS	AVAILABILITY	DATA ACCESS
<b>TradeSuite ID API w/CTM</b>	<b>Yes</b>	CTM organization will be auto provisioned, and client will be able to search for trade records under the provisioned CTM BIC(s).  TradeSuite ID Direct numbers will need to be set up manually via client onboarding after client specifies the CTM BIC(s) corresponding to the TradeSuite ID numbers that are used by the same legal entity.  Once set up, client will be able to search for TradeSuite ID confirms under the provisioned TradeSuite IDs.
<b>TradeSuite ID API w/o CTM</b>	<b>No</b>	N/A
<b>TradeSuite ID UI (Web) w/ CTM</b>	<b>Yes</b>	Both CTM and TradeSuite ID Web organizations will be auto provisioned and client will be enabled to search for records under the provisioned CTM BIC(s) and TradeSuite IDs.
<b>TradeSuite ID UI (Web) w/o CTM</b>	<b>Yes</b>	TradeSuite ID Web organization will be auto provisioned, and client will be able to view TradeSuite ID confirms.
<b>TradeSuite ID UI (Limited) w/ CTM</b>	<b>Yes</b>	CTM organization will be auto provisioned and client will be able to search for trade records under the provisioned CTM BIC(s).  TradeSuite ID Limited numbers will need to be set up manually via client onboarding after client specifies the CTM BIC(s) corresponding to the TradeSuite IDs that are used by the same legal entity.  Once set up, client will be able to search for TradeSuite ID confirms under the provisioned TradeSuite IDs.
<b>TradeSuite ID UI (Limited) w/o CTM</b>	<b>No</b>	N/A

## NON-CLIENT USE CASES

INSTITUTION / BUY SIDE USE CASES	TRADE ARCHIVE DATA ACCESS	
SUBSCRIPTIONS	AVAILABILITY	DATA ACCESS
<b>TradeSuite "ID Only" w/CTM</b>	<b>Yes, only for CTM records</b>	CTM organization will be auto provisioned and client will be enabled to search for CTM records under the provisioned CTM BIC(s).
<b>TradeSuite "ID Only" w/o CTM*</b>	<b>No</b>	N/A

**Institutions that get their trades processed in TradeSuite ID using the custodian's omnibus TradeSuite ID will not have access to Trade Archive.**



## **I HAVE SIGNED UP FOR DTCC ITP ARCHIVAL SERVICES, BUT I DO NOT SEE THE TRADESUITE ID CONFIRM RECORDS. WHAT DO I NEED TO DO?**

DTCC archives TradeSuite ID confirms based on the TradeSuite ID populated on the confirm by the broker as either the Institution or the Interested Party.

Steps to take as an institutional client:

1. Update your ALERT® DTC SSIs.
2. Ensure the broker has included the institutional client's TradeSuite ID number in their local data store.

If the counterparty to the institutional client is a M2i broker, the institutional client's Inst/Broker ID and Interested Party ID numbers will be mapped directly from ALERT via CTM to the TradeSuite ID confirm.

## **WHAT DO INSTITUTIONAL CLIENTS NEED TO DO TO KEEP DTC SSIs UPDATED?**

For trades that are affirmed by the institution investment manager or its custodian in TradeSuite ID, please make sure to populate Inst/Broker ID field correctly for DTC SSIs with the institution investment manager TradeSuite ID.

For trades that go through the Prime Broker workflow in TradeSuite ID, please make sure to populate Interested Party ID 1 or Interested Party ID 2 field for DTC SSIs with the institution investment manager TradeSuite ID.

If for any reason the institution investment manager cannot put the institution investment manager TradeSuite ID number in the Inst/Broker ID field, please place it in the Interested Party field.

Instructions for updating ALERT with the institution investment manager TradeSuite ID number can be found [here](#).

## **CAN INSTITUTIONAL CLIENTS CONTINUE TO RELY ON THE EXISTING NO-ACTION LETTERS WITH THE MOVE TO T+1?**

Yes. In light of the new expanded capability, we sought advice from external counsel to determine whether the no-action letters may still be relied upon by a U.S. Registered Investment Advisor (RIA) despite the expanded Rule 204-2 requirements which will become effective on May 28, 2024 in line with the change to the U.S. settlement cycle to "T+1". DTCC ITP LLC obtained the legal guidance to confirm the appropriateness of RIA continued reliance. This has been memorialized in a supplemental memo from external counsel. If you would like to request a copy of the memo once subscribed to the service, please contact your Relationship Manager or DTCC Help Desk.

## **FOR MORE INFORMATION**

**Please contact us via [MyDTCC](#).**

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