FINRA Advertising Regulation

Batch Submission of Filings, Version 3

(Last updated: December 15, 2021)

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Document location

This document is available on FINRA.org via a link at the bottom of this page:
http://www.finra.org/industry/advertising-regulation-electronic-files

Revision History

Date	Editor	Comments
9 September 2016	Clarence Burns	Initial publication of Version 2 document.
15 September 2016	Clarence Burns	Clarifications in the "What you need in order to submit batch filings" section.
6 January 2017	Clarence Burns	Updated to add new XML tags associated with FINRA Regulatory Notice 16-41.
13 February 2017	Nello DeBlasio	Formatting updates and minor text edits.
11 October 2017	Nello DeBlasio	Updated to add new XML tags associated with Website content upload (see FINRA Regulatory Notice 17-31).
11 July 2020	Badar Khokhar	AREF Batch Submission of filings migration to fileX. fileX is FINRA's centralized and secure file transfer platform. fileX significantly streamlines the process for submitting bulk filings to FINRA, provides additional options for submitting those filings to FINRA, and allows for seamless authentication and authorization.

Description

Through the use of XML meta data files as well as associated documents are transmitted via fileX protocols (SFTP, HTTPS Rest & S3 Direct). Batch Submission enables FINRA member firms to submit a large volume of Advertising filings directly to a secure server and to automate and streamline the submission process.

Firms with a high volume of advertisements (typically around 500 per year or more) may find that batch submission is more efficient than manually submitting pieces to FINRA one at a time using the AREF (Advertising Regulation Electronic Filing) web site.

Implementation steps for firms new to batch submission

Typically, the steps to start using Batch Submission look like the following:

1. Read this document thoroughly;
2. Read the fileX user guide thoroughly; Click Here for fileX Details
3. Have a preliminary conversation with FINRA;
4. Acquire all necessary accounts and verify connectivity to FINRA;
5. Settle upon an FTP mechanism or FTP client software;
6. Develop XML-constructor software, working through any questions with FINRA;
7. Upload several test filings to FINRA's Customer Test Environment (TEST) and work out any issues with XML formatting and the upload process;
8. Acquire verification from FINRA that the test files were received properly;
9. Begin uploading actual advertisements to FINRA's production servers.

Required contact information

FINRA makes announcements regarding AREF and the Advertising batch submission system. Therefore, please provide contact information for both a technical contact as well as a business contact. It is strongly recommended that this information is kept updated. Please send the contact information to Advertising-Technology@finra.org.

Requirements to submit batch filings

To submit batch filings, the following **five** items are required:

1. Advertisement(s) in a file format acceptable to FINRA
2. Structured metadata in an XML file format,
3. EWS account with entitlements to AREF,
4. SFTP, HTTPS REST, or S3 Direct access to FINRA via fileX,
5. EWS machine to machine(FTP) accounts for Advertising Batch Submissions
   a) FINRA Test Environment FTP account
   b) FINRA Production FTP Accounts

Note that the accounts in numbers 3 and 5 are distinct accounts, each with their own username and password.

1. *Advertisement(s) in a file format acceptable to FINRA*

You must have all files to be submitted, including the advertisements themselves in a file format acceptable to FINRA (PDF, audio-video, and MS Office formats), together with the associated metadata required for submission (e.g., date of first use, name of principal that approved the communication, whether the communication will be preceded or accompanied by a prospectus, etc.).

2. *Structured metadata converted to XML file*

You will also have to develop a tool to consolidate all structured data (See Appendix A for a full list of data requirements) into a single batch file that conforms to the XML schema definition (See Appendix C). This file must be suffixed by ".mdata" to be processed.

3. *EWS account with entitlements to AREF*

Access to the vast majority of FINRA systems is controlled by FINRA EWS (Enterprise Web Security) accounts. Typically, users of FINRA systems need only one username and password to access all applications to which they are entitled.

To submit Advertising batch filings, two accounts are needed: one to allow the machine to machine (FTP) communication to transfer the file via fileX, and one web(human) account to access AREF (Advertising Regulation Electronic Filing).

If your firm is currently submitting advertisements electronically to FINRA, then you already have at least one user with entitlements to AREF, and those credentials could be used.

If your firm does not currently submit electronically, you can ask your firm account administrators – the people at your firm who have the rights to create EWS accounts – to create and entitle a new account.

If you cannot determine your account administrators, please call the FINRA Call Center at (800) 321-6273 and select option 1 for entitlements questions. The operator can help you more easily if you know your firm's CRD number.

4. *File Transfer via fileX to FINRA*

You will need to determine whether or not your firm has already established access to FINRA's fileX servers in order to submit other regulatory information. The Regulation Filing Administrator within your firm can provide you with this information. Questions regarding obtaining access to the system can be directed to (800) 321-6273.

Note that while most FTP clients can support the technical requirements of Batch Submission, FINRA does not provide technical support for any client software. Firms need to understand that it is their responsibility to be sufficiently proficient with their applications.

1. HTTPS Rest (port 443), SFTP (port 22), and S3 Direct protocols are supported. Please refer to the fileX user guide for additional information regarding the various supported file transfer protocols;
   Click Here for fileX Details

The SFTP option requires FINRA to open a port on its firewall, tied to a specific source IP address on the customer's side. This process requires a bit of paperwork and a lead time measured in weeks.

5. *EWS FTP accounts for Advertising Batch Submissions*

Beyond the ability to connect and transmit via fileX to FINRA (described above), you will also need machine to machine(FTP) credentials. These credentials are just for the fileX server and are completely different from the normal FINRA EWS (Enterprise Web Security) credentials that are used for most web-based applications.

You will need a separate account for both the Test and Production environments.

a.   FINRA Test Environment FTP Accounts

If your firm does not have an FTP test account, please send an email to Advertising-Technology@finra.org requesting a test FTP account be set up for submitting Advertising Batch Submissions. An account will be provided.

b.   FINRA Production FTP Accounts

If your firm does not already have an FTP account, the "FINRA Entitlement Form FILE TRANSFER Applications FTP User" form can be obtained by calling the FINRA Gateway Call Center at (301) 869-6699.

Within Section 4 – Entitlement Privileges, please select the checkbox labeled, "ADV File Transfer" to add or remove entitlements for Advertising File Transfers.

Please note that this form must be signed by one of the following:
   •   FINRA Account Administrator
   •   Executive Representative
   •   Direct Owner
   •   Indirect Owner
   •   Executive Officer

Accounts on the production and test FTP servers are not synchronized, so even if you create an account with the same username on both servers, the passwords can be different, and changes to one will not cascade to the other.

Submission and review process: Test environment

The below instructions refer explicitly to FINRA's **Test Environment**, which is a sandbox offered to firms who are developing automated interfaces to FINRA's systems, and populates only QC databases on FINRA's side (not actual production systems).

This test environment should be used by firms to **test** the batch submission process (with help from FINRA), **before using the production system**.

Submissions or other actions in the test environment will have no effect on actual filings by your firm within the production system.
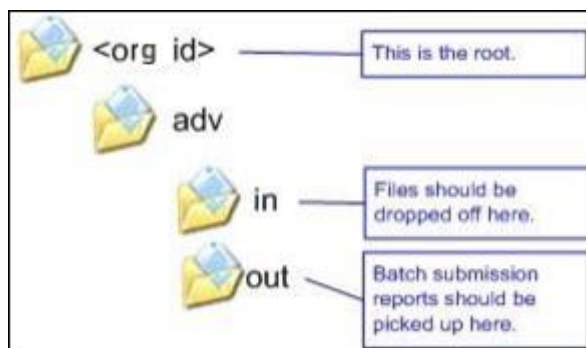
The test environment is not covered by an SLA, and is therefore not guaranteed to be up at all times, particularly evenings and weekends.

The following environment- specific variables are to be used for the test environment:

- AREF Online Test environment is: **http://firms1.qa.finra.org/firm-gateway**
- fileX (Lower QA) Test Batch FTP Server: Please view the 'Environment and Connectivity' section of the fileX user guide; Click Here for fileX Details.

To submit the file

- Connect to the FINRA fileX Severs via selected protocol (SFTP,HTTPS REST, or S3 Direct) – refer to appendix F for server.
- Authenticate in with a valid FTP account and password
- Note that the FTP servers will lock out an account after 3 consecutive failed attempts to connect, so verify your username and password carefully if you experience an error.
- The diagram below illustrates FINRA's batch submission folder structure. Note the two child folders: one is used to deposit files ("in") and a different folder is used to retrieve FINRA submission reports ("out"). Change your directory to the adv/in folder.

- For file submissions: cd **adv/in**
- For report & communication retrievals: **cd adv/out**
- For archived file submission: cd **adv/in_arcv**

- Each submission must be accompanied by its own meta-data file. This is being done due to the complexity of tracking more and larger files for multiple communications back to a single meta-data file and still being able to provide accurate timely responses to firms for submissions.
- When uploading files as part of an ADV submission, the meta-data file MUST be the LAST file uploaded. This file will act as an end of submission marker for FINRA letting us know that all files necessary for the submission have been successfully loaded to FINRA. As the meta-data file validation starts the process, we can be assured that all files identified within the meta-data reside within processing, thus eliminating the need to set aside submissions and wait for files that have not yet arrived at FINRA.
- As a matter of process, we ask that no communication be resubmitted once the meta-data file has been transmitted until the Filing Report has been received by the firm. This ensures that the second submission does

not get rejected as a duplicate submission. This is required to ensure we have proper time to reset the environment with regard to files previously submitted.
- Allow the transfer of the file to complete, then view your transmitted file in the adv/in_arcv directory.

To retrieve the output report files

Batch files will be processed Monday through Friday 0000 – 2300 Eastern Time every 10 minutes. However, due to the acceptance of larger file sizes, there could be some delays during peak transmission times. Once the file processing cycle has started, another cycle will not start until the current cycle finishes. With larger files come higher transfer rates between servers which may cause a few cycle times to exceed 10 minutes.

Files may be sent over to FINRA on non-business days, but will not be processed until the next business day.

After the processing of your filing is complete, the requested filing report formats are placed back into your fileX directory. The first file is a text formatted output report (See Appendix D) called RPT_xxxxx.txt (where xxxxx is the complete filename you uploaded to FINRA). The second file is an XML formatted output report (See Appendix B) called RPT_xxxxx.xml.

We changed the format of the file name of the Filing Report to provide you more information without having to open and parse the report itself. The new Filing Report will have a file name in the format: <mdatafilename>_<UID1>_[FINRA Reference Number | REJETESTD].[TXT | XML]
(examples: <mdatafilename>_<UID1>_FX2014-0404-0148.TXT or
<mdatafilename>_<UID3>_REJETESTD.XML)

We changed the XML schema for the Filing Report to simplify it and allow for better detail reporting of rejected submissions. Where possible we give as an extensive validation as the data submitted allows. The goal is to make completing the submission process as easy as possible. Samples of both the XML and TXT Filing Report formats are provide at the end of this document.

As a matter of general practice, the output file should be available in the "out" folder within one hour from the time the file is uploaded to fileX.

Reminder: the output files are retrieved from the "out" folder, not the "in" folder where the files are dropped off.

- ☐ Get your output reports (Example: Get RPT_xxxxx.xml or Get RPT_xxxxx.1)

To review submitted filings

Following the submission, you can review the packets using the AREF online system (refer to the New System Navigation guide).

Batch Send option for receiving FINRA communications

This option is only available for filings submitted to FINRA via the Batch submission process. Please note that whether a firm uses this option or not, all communications will remain available through AREF.

The Batch Send of FINRA Communication letters is activated on a filing by filing basis via use of the optional 'BatchSendFl' tag. Firm participation of the Batch Send Process must be explicitly declared submitting a filing. If a firm does not supply the XML tag 'BatchSendFl' or supplies a value not = 'Y', then the FINRA communication letters associated with that filing will not be available to the firm via fileX.

The communications will be delivered as PDF files. The Member firm can retrieve the PDF files and process them as is. As multiple communications can be sent referencing the same submission, FINRA recommends that firms' scripts include an explicit removal of the file from the FTP "out" directory on the FINRA FTP server once the document has been retrieved.

The File Name will be the FINRA Reference number (RPT_F[R|X]YYYY-MMDD-NNNN) assigned to the filing at the time it is submitted, followed by a B and a 3-digit number representing the communication sequence number. For released filings, the seq. number will be followed by the 8-character Final Result code. The full file name will look like "RPT_FX2014-0404-0148_B002.PDF" or "RPT_FR2014-04040135_B003_OK.PDF". Values that can appear here are the same values that currently appear in the AREF Cabinet (OK, REVISE, DONOTUSE, etc.).

Submission and review process: Production

> The below instructions refer explicitly to FINRA's **production environment**.
>
> **Submissions in the Production environment will be treated as actual filings by your firm.**

FINRA's test environment mirrors the production environment. So, once you have completed all test processes and are ready to use the production system, the instructions that precede this section remain the same, except for the following environment-specific variables:

- Production AREF Application environment is: **https://firms.finra.org**
- FINRA fileX Batch Server is: Please view the 'Environment and Connectivity' section of the fileX user guide; Click Here for fileX Details.

Troubleshooting and Frequently Asked Questions

I can log into TEST but not production fileX server (or vice versa)

Accounts on the production and TEST(Lower QA) fileX servers are not synchronized, so even if you create an account with the same username on both servers, the passwords can be different, and changes to one will not cascade to the other.

To change the TEST password the administrator (using his or her production account and password must log on to the TEST web site.

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"Invalid Submitter user id" (expired user accounts in TEST)

Two sets of credentials are needed to execute a batch submission:
- the FTP account, which allows the file to be transferred, and
- the AREF Website user (FINRA EWS) account, the username of which is embedded in the XML and allows access to the Advertising systems. Prior to using an AREF Website user account within a batch submission, the user must first log in to AREF in Firm Gateway (https://firms.finra.org/) and fill out the Registration Information. The batch submission will fail if the account does not have the Registration Information and will display this error.

The second of those accounts (the EWS account) is subject to periodic deletion as part of an occasional refresh of the TEST databases.

If you should be testing in TEST and receive a Batch Submission report with an error message similar to the below message, it is likely that the EWS account, while still valid, has been deleted from the TEST environment:

To correct this, please ensure that you are using the correct account – the EWS account, and not the FTP account.

Invalid XML errors

XML is a standard protocol for representing structured data. This standard allows and disallows various characters. Disallowed characters often have a substitute string that will be translated to that character. For just one example, the special character "&" (ampersand) causes a failure in XML. If you wish to use it literally, you must use "&" for the ampersand character. Please consult the XML standard for more details.

Can a firm use both Batch and online AREF at the same time?

Yes, both batch and online AREF work together. A firm can submit some filings by batch and others online. Filings submitted by batch can be viewed online and online is used to submit subsequent communications if they are not included in the original submission.

Is there an additional cost to submitting filings by batch?

There is no additional cost for filing by batch. Filing charges are the same whether the filing is submitted by batch, by online AREF or by hard-copy.

Can Service Providers batch file on behalf of Member Firms?

Service providers are defined as organizations who are not FINRA Member Firms, but whom have been engaged by FINRA Members Firms to process work on behalf of those firms. The AREF System does not directly support Service Providers and FINRA does not maintain a relationship with Service Providers for purposes of AREF. However, individual Member Firms are free to engage Service Providers to perform work on their behalf.

If a FINRA Member Firm does engage a Service Provider, the Member Firm is responsible for providing all access, including user IDs and passwords, to that Service Provider as indicated in the several sections above. Additionally, the Member Firm remains responsible for all connections and filings the Service Provider makes on behalf of that Member.

If a Service Provider is engaged by more than one Member Firm, each Member Firm must provide the Service Provider with a separate account for each firm.

Getting help

To access important information about AREF, please visit:
Click Here for AREF Batch Submission Details

To access important information about fileX, please visit:
Click Here for fileX Details

For questions about the review process and any business requirements, please contact Advertising Regulation at (240) 386-4500.

For technical assistance, please contact the FINRA Call Center at (800) 321-6273, and specify that your issues are with the "**Batch Submission feature for Advertising Regulation**" and whether you are executing in our test or production environment. The call center will route your query to the Technology group that supports Batch Submission.

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Appendix A: Field Descriptions Table

XML TAG	Required or Optional	Format	Description	Comments
CommunicationList	Required	N/A	XML File Header tag (**Only 1 per file**).	
DefnVrsn	Required	**String**	Schema Definition Version - set to "**2**" for use with version 2 of schema Valid values: **2**	**Required** if using other than the original version of the XML schema; any value other than **2** will cause an XSD schema error. Once corrected, resubmit the entire filing.
FlngRpt	Required	**String**	Format of Filing Report you wish to receive Valid values: **XML**, **TXT**, or **BTH**	Use this field to identify the format you desire for the Filing Report. The options are XML, TXT (text), or BTH (continue to receive BOTH formats).
Communication	Required	N/A	XML Submission tag (**1 per filing submitted for review**).	
CommId	Required	**String** up to 40 char.	Unique ID for each firm submission	ALL filenames used for this submission MUST use this value as the prefix in the actual file name: <CommId>-<filename>
SubmitterEWSLogin	Required	**String** 20 chars.	EWS login of the person submitting the communication on behalf of the firm.	See firm EWS administrator for Login ID.
ReviewType	Required	**String**	Expedited or Regular review Valid values: **Expedited** or **Regular**	
BatchSendFl	Required	**String** 1 character	The Batch Send of FINRA Communication letters is activated on a filing by filing basis. Firm participation of the Batch Send Process is explicitly declared with every batch submitted filing. If a fir does not supply the XML tag 'BatchSendFl' or supplies a value not = Y, then the FINRA communication letters will not be FTP'ed to the firm. Valid values: **Y** (use Batch Send Process) or **N** (default)	The File Name will be FRYYYY-MMDD-XXXX_B_NNN_RRRRRRRR.pdf. YYYYMMDD-XXXX represents the reference number as in WEBADV system, NNN represents the communication sequence number (uniquely identifies each communication within a filing), and RRRRRRRR will be the Final Result for all Released Filings.
RecipientEWSLogin	Required	**String** 20 chars.	EWS login of the person to whom the comment letter should be addressed.	See firm EWS administrator for Login ID.
FileNm2Rvw	Required	**String** up to 200 char.	Full File Name of the document to review.	This name must match the file uploaded along with the metadata (and must be unique within your FTP IN directory). Actual file uploaded is limited to 1.75GB in size.
Title	Required	**String** up to 160 chars.	Title of the communication.	

BillingUnit	Required	**String**	Billing Unit for the communication FileNm2Rvw - "PAGES" for text type files; "MINUTES" for Audio Video files; "WEBPAGES" for website content.	
NoBUs	Required	**UnsignedShort** up to 4 chars.	Number of Billing Units within the Piece Document submitted	

XML TAG	Required or Optional	Format	Description	Comments
Preceded	Required	**String** 1 character	Preceded or accompanied by prospectus? Valid values: **Y** or **N**	
DateOfFirstUse	Required	**mm/dd/yyyy**	Date the communication will be used.	
PrincipalTitle	Required	**String** up to 50 chars.	Title of the registered principal who approved the communication.	
PrincipalID	Required	**String** up to 12 chars.	The CRD number of the Registered Principal who approved the communication.	
DateOfApproval	Required	**mm/dd/yyyy**	Date the registered principal approved the communication.	
FirmExternalRef	Optional	**String** up to 50 chars.	Firm's internal tracking number.	
RelatedFINRARef	Optional	**String** 16 chars. (FRyyyymmdd-nnnn)	Related FINRA Reference Number of a previous filing which may be related.	Do not include the "/B", "/H", "/E" suffixes.
CommunicationUses	Optional	**String** up to 31,500 chars.	Explain how the communication is to be used.	Expanded Q3 2013

XML TAG	Required or Optional	Format	Description	Comments
DeliveryMethod	Required	**String** up to 8 chars.	Delivery method is determined by the format in which the material is being used or the medium through which it is being distributed. Valid values: **ACCTMSSG** : Account statement related communications **ARTICLE** : Articles and third party reprints **BDUSE** : Broker Dealer use only material **BROCHURE** : Brochures, pamphlets, and catalogs **DISC/TPE** : Audio/video tapes, CDs, and DVDs **ELECMSSG** : Email, IM, SMS, or text messages **FUNDFACT** : Fund-specific information sheets **HANDOUT** : Flyers and other hand-delivered material **MAILING** : Mailed sales material **PERFREPT** : Periodic and other performance reports **PHONE** : Telemarketing and other phone scripts **PRESSREL** : Information related to the press **PRINT AD** : Print advertisements, posters, and signs **RADIO** : Radio advertisements and broadcasts **RESEARCH** : Research reports – equity and debt **SEMINAR** : Seminar-related communications **SOFTWARE** : Software output and IA tools **STATIONE** : Business-related stationery **TV** : TV advertisements and broadcasts **WEBPUBLC** (note that "i" is missing): Web information – public access) **WEBPASS** : Web information – password protected	Valid values shown are current as of the release of this document; please check the New Communication Form for the most up-to-date list. Only one delivery method may be specified per piece. **If a piece is to be delivered via multiple methods, that piece must be submitted to FINRA separately for each delivery method.**

XML TAG	Required or Optional	Format	Description	Comments
RuleDefn	Required	**String** up to 8 chars.	Indicate one Rule Definition applicable to each communication. Valid values: **RETAIL** : Retail communications **INSTCOMM** : Institutional communications **CORRESP** : Correspondence	Valid values shown are current as of the release of this document; please check the New Communication Form for the most up-to-date list. See Regulatory Notice 12-29 for information regarding the new Rule Definition values in place February 4, 2013.
TmpltUpdt	Optional	**String** 1 character	Pertains to question: Update to previously reviewed template? A value of "Y" is only allowed for filings with the tag <RuleDefn> having a value of RETAIL. Valid values: **Y** or **N** (default)	New as of 1/9/17

XML TAG	Required or Optional	Format	Description	Comments
GnrcNvsmt	Optional	**String** 1 character	Pertains to question: Generic Investment Company Communication? A value of "Y" is only allowed for filings with the tag <RuleDefn> having a value of RETAIL, and all <DeliveryMethod> tags having a value of CLOSED, ETF, MUTUALS, UIT, VA, VLI. Valid values: **Y** or **N** (default)	New as of 1/9/17
SmAnnlRpt	Optional	**String** 1 character	Pertains to question: Semi-annual or annual report? A value of "Y" is only allowed for filings with the tag <RuleDefn> having a value of RETAIL, and the tag <DeliveryMethod> having a value of PERFREPT. Valid values: **Y** or **N** (default)	New as of 1/9/17

XML TAG	Required or Optional	Format	Description	Comments
Product	Required	**String** up to 8 chars.	Product enables firms to select the main type(s) of product(s) being solicited or promoted in the material submitted for review. Valid values: **529PLANS** : 529 Education Funding Plans **BDC** : Business Development Company **BONDS** : Corporate Bonds **CDS** : Certificates of Deposit **CLOSED** : Closed-End Mutual Fund **CMO** : Collateralized Mortgage Obligation **DAYTRADE** : Day Trading **DISCOUNT** : Discount Brokerage **DPP** : Direct Participation Program **ETF** : Exchange Traded Fund **FIXEDINS** : Fixed Insurance **GENERAL** : General Business **GOVT** : Government Securities **HEDGEFUN** : Hedge Funds **MUNI** : Municipal Securities **MUTUALS** : Open-End Mutual Fund **NOTES** : Note Offerings **OPTIONS** : Options **OTHER** : Other **PRIVPLMT** : Private Placements **REITS** : Real Estate Investment Trusts **SFUTURES** : Security Futures **STOCKS** : Stocks **STRUCPRD** : Structured Products **UIT** : Unit Investment Trust **VA** : Variable Annuity **VLI** : Variable Life Insurance	Multiple Product Types can be used to each communication (at least one is required. Valid values shown are current as of the release of this document; please check the New Communication Form for the most up-to-date list.
RegisteredRep	Optional	**String** up to 12 chars.	Indicate the CRD IDs of the registered representatives for this communication.	May occur 0 to a Maximum 5 times.

XML TAG	Required or Optional	Format	Description	Comments
WtgReviewlttr	Required	**String** 1 character	Indicate whether they are waiting for Review letter for the submitting communication Valid values: **Y** or **N**	
IncludesPerfRanking	Optional	**String** 1 character	Indicate whether Performance Ranking is submitted with this communication. Valid values: **Y** or **N**	Based on the rule change, the value associated with this tag has no meaning and will be ignored. For now the tag is being changed from Required to Optional to insure that no filings get rejected because of the appearance of this tag.
Addtnlinfo	Optional	N/A	Group tag for each Additional Information File being submitted.	May occur any number of times.
AIFileNm	Optional	**String**	File name of the file containing additional information. This name must match the file uploaded along with the metadata (and must be unique within your FTP **IN** directory).	Actual file uploaded is limited to 1.75 GB in size. **Required for each <Addtnlinfo> file submitted.**
XML TAG	**Required or Optional**	**Format**	**Description**	**Comments**
CommPurpsCd	Optional	**String** up to 8 chars.	Communication Purpose Code - Required if IncludesAddtnlinfo = '**Y**'. Only one value is required. Maximum of one value allowed. Valid values: **COVERLTR** : COVER LETTER **FILRESPO** : FINRA REQUESTED INFO **FILWITHD** : MEMBER REQUESTS THAT FILING BE WITHDRAWN **MEDIA** : CD, DVD, ETC. **PERFRANK** : PERFORMANCE RANKING OF AN INVESTMENT COMPANY **PROSPCTS** : PROSPECTUS OR OTHER OFFERING DOCUMENT **RESPFINR** : RESPONSE TO FINRA REVIEW LETTER **SUPRTDOC** : SUPPORTING DOCUMENTATION	**Required for each <Addtnlinfo> file submitted.**
NotesTx	Optional	**String** up to 4,000 chars.	This string is a place for additional notes to the analyst about the file being attached.	**Optional notes for each <Addtnlinfo> file submitted.** Examples of text that could be entered in this fields include the following: - "This document replaces document submitted on 5/12/2008. Original document did not print to pdf correctly." - "This piece was revised after it was originally submitted."

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Appendix B: Sample .MDATA File

This is an example of a valid .mdata file

```xml
<?xml version="1.0" encoding="UTF-8"?>
<!--Sample XML file generated by XMLSpy v2015 rel. 3 sp1 (x64) (http://www.altova.com)-->
<CommunicationList xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xsi:noNamespaceSchemaLocation="ADV%20Batch%20Schema%20V2.xsd">
        <DefnVrsn>2</DefnVrsn>
        <FlngRpt>XML</FlngRpt>
        <Communication>
                <CommId>CID201600001</CommId>
                <SubmitterEWSLogin>SAMPLE1</SubmitterEWSLogin>
                <ReviewType>REGULAR</ReviewType>
                <BatchSendFl>Y</BatchSendFl>
                <RecipientEWSLogin>SAMPLE1</RecipientEWSLogin>
                <FileNm2Rvw>CID201600001-MYCOMMUNICATION.MOV</FileNm2Rvw>
                <Title>Sample Title</Title>
                <BillingUnit>MINUTES</BillingUnit>
                <NoBUs>2</NoBUs>
                <Preceded>N</Preceded>
                <DateOfFirstUse>09/12/2016</DateOfFirstUse>
                <PrincipalTitle>Chief Compliance Officer</PrincipalTitle>
                <PrincipalID>999999</PrincipalID>
                <DateOfApproval>09/01/2016</DateOfApproval>
                <FirmExternalRef>50characterFirmExternalRefNumber</FirmExternalRef>
                <RelatedFINRARef/>
                <CommunicationUses>Explanation of Purpose of Communication</CommunicationUses>
                <DeliveryMethod>TV</DeliveryMethod>
                <RuleDefn>RETAIL</RuleDefn>
                <TmpltUpdt>Y</TmpltUpdt>
                <GnrcNvsmt>Y</GnrcNvsmt>
                <SmAnnlRpt>Y</SmAnnlRpt>
                <Product>529PLANS</Product>
                <Product>GENERAL</Product>
                <RegisteredRep>999991</RegisteredRep>
                <RegisteredRep>999992</RegisteredRep>
                <RegisteredRep>999993</RegisteredRep>
                <WtgReviewlttr>N</WtgReviewlttr>
                <IncludesPerfRanking>N</IncludesPerfRanking>
                <AddtnlInfo>
                        <AIFileNm>CID201600001-TRANSSCRIPT.PDF</AIFileNm>
                        <CommPurpsCd>SUPRTDOC</CommPurpsCd>
                        <NotesTx>Transcript of commercial.</NotesTx>
                </AddtnlInfo>
                <AddtnlInfo>
                        <AIFileNm>CID201600001-CoverLtr.docx</AIFileNm>
                        <CommPurpsCd>COVERLTR</CommPurpsCd>
                        <NotesTx></NotesTx>
                </AddtnlInfo>
        </Communication>
</CommunicationList>
```

Appendix C: XML Schema Definition (XSD) for the .MDATA file

Note that this is an **XSD**, and not a sample XML document of the type that would be uploaded. FINRA recommends that all filers validate their .MDATA files to be submitted against this XSD BEFORE submitting. This will help eliminate a large number of errors causing files to be rejected.

```xml
<?xml version="1.0" encoding="utf-8"?>
<xs:schema xmlns:xs="http://www.w3.org/2001/XMLSchema" elementFormDefault="qualified">
    <xs:element name="CommunicationList">
        <xs:complexType>
            <xs:sequence>
                <xs:element name="DefnVrsn" type="xs:string" fixed="2">
                    <xs:annotation>
                        <xs:documentation>Schema Definition Version - set to "2" to identify this schema, no value required by submitter</xs:documentation>
                    </xs:annotation>
                </xs:element>
                <xs:element name="FlngRpt">
                    <xs:annotation>
                        <xs:documentation>Report Type - valid values ("BTH","XML","TXT")</xs:documentation>
                    </xs:annotation>
                    <xs:simpleType>
                        <xs:union>
                            <xs:simpleType>
                                <xs:restriction base="xs:string">
                                    <xs:enumeration value="BTH"/>
                                    <xs:enumeration value="TXT"/>
                                    <xs:enumeration value="XML"/>
                                </xs:restriction>
                            </xs:simpleType>
                            <xs:simpleType>
                                <xs:restriction base="xs:string">
                                    <xs:pattern value="[Bb][Tt][Hh]"/>
                                    <xs:pattern value="[Tt][Xx][Tt]"/>
                                    <xs:pattern value="[Xx][Mm][Ll]"/>
                                </xs:restriction>
                            </xs:simpleType>
                        </xs:union>
                    </xs:simpleType>
                </xs:element>
                <xs:element ref="Communication" minOccurs="1" maxOccurs="1"/>
            </xs:sequence>
        </xs:complexType>
    </xs:element>
    <xs:simpleType name="fileNm">
        <xs:restriction base="xs:string">
            <xs:minLength value="7"/>
            <xs:maxLength value="200"/>
            <xs:pattern value="([A-Za-z0-9])[A-Za-z0-9 ._-]+"/>
        </xs:restriction>
    </xs:simpleType>
    <xs:simpleType name="YNflag">
        <xs:restriction base="xs:string">
            <xs:maxLength value="1"/>
            <xs:pattern value="(Y|N|y|n)"/>
        </xs:restriction>
    </xs:simpleType>
    <xs:simpleType name="dateVal">
        <xs:restriction base="xs:string">
            <xs:pattern value="(0[1-9]|1[012])/(0[1-9]|[12][0-9]|3[01])/20\d{2}"/>
        </xs:restriction>
    </xs:simpleType>
    <xs:element name="Communication">
        <xs:complexType>
            <xs:sequence>
                <xs:element name="CommId" nillable="false">
                    <xs:annotation>
                        <xs:documentation>Unique ID for each communication</xs:documentation>
```

```xml
            </xs:annotation>
            <xs:simpleType>
                <xs:restriction base="xs:string">
                    <xs:maxLength value="50"/>
                    <xs:pattern value="([A-Za-z0-9])[A-Za-z0-9 ._-]+"/>
                </xs:restriction>
            </xs:simpleType>
        </xs:element>
        <xs:element name="SubmitterEWSLogin" type="xs:string" nillable="false">
            <xs:annotation>
                <xs:documentation>Person submitting the communications on behalf of the firm</xs:documentation>
            </xs:annotation>
        </xs:element>
        <xs:element name="ReviewType" nillable="false">
            <xs:annotation>
                <xs:documentation>Review Type - valid value ("EXPEDITED", "REGULAR")</xs:documentation>
            </xs:annotation>
            <xs:simpleType>
                <xs:union>
                    <xs:simpleType>
                        <xs:restriction base="xs:string">
                            <xs:enumeration value="EXPEDITED"/>
                            <xs:enumeration value="REGULAR"/>
                        </xs:restriction>
                    </xs:simpleType>
                    <xs:simpleType>
                        <xs:restriction base="xs:string">
                            <xs:pattern value="[Ee][Xx][Pp][Ee][Dd][Ii][Tt][Ee][Dd]"/>
                            <xs:pattern value="[Rr][Ee][Gg][Uu][Ll][Aa][Rr]"/>
                        </xs:restriction>
                    </xs:simpleType>
                </xs:union>
            </xs:simpleType>
        </xs:element>
        <xs:element name="BatchSendFl" type="YNflag" nillable="false">
            <xs:annotation>
                <xs:documentation>Batch Send Flag – set to "Y" to get communication letters returned batch; otherwise "N".</xs:documentation>
            </xs:annotation>
        </xs:element>
        <xs:element name="RecipientEWSLogin" nillable="false">
            <xs:annotation>
                <xs:documentation>EWS account of the Person to whom FINRA Letters should be addressed</xs:documentation>
            </xs:annotation>
            <xs:simpleType>
                <xs:restriction base="xs:string">
                    <xs:minLength value="1"/>
                    <xs:maxLength value="20"/>
                    <xs:pattern value="[A-Za-z0-9]+"/>
                </xs:restriction>
            </xs:simpleType>
        </xs:element>
        <xs:element name="FileNm2Rvw" type="fileNm" nillable="false">
            <xs:annotation>
                <xs:documentation>Full name of the file to be reviewed</xs:documentation>
            </xs:annotation>
        </xs:element>
        <xs:element name="Title" nillable="false">
            <xs:annotation>
                <xs:documentation>Piece Title of FileNm2Rvw</xs:documentation>
            </xs:annotation>
            <xs:simpleType>
                <xs:restriction base="xs:string">
                    <xs:maxLength value="160"/>
                </xs:restriction>
            </xs:simpleType>
        </xs:element>
        <xs:element name="BillingUnit" nillable="false">
            <xs:annotation>
                <xs:documentation>Billing Unit for FileNm2Rvw - "PAGES" for text type files; "MINUTES" for Audio Video files; "WEBPAGES"
                    for website content.</xs:documentation>
```

```
            </xs:annotation>
            <xs:simpleType>
                <xs:union>
                    <xs:simpleType>
                        <xs:restriction base="xs:string">
                            <xs:enumeration value="MINUTES"/>
                            <xs:enumeration value="PAGES"/>
                            <xs:enumeration value="WEBPAGES"/>
                        </xs:restriction>
                    </xs:simpleType>
                    <xs:simpleType>
                        <xs:restriction base="xs:string">
                            <xs:pattern value="[Mm][Ii][Nn][Uu][Tt][Ee][Ss]"/>
                            <xs:pattern value="[Pp][Aa][Gg][Ee][Ss]"/>
                            <xs:pattern value="[Ww][Ee][Bb][Pp][Aa][Gg][Ee][Ss]"/>
                        </xs:restriction>
                    </xs:simpleType>
                </xs:union>
            </xs:simpleType>
        </xs:element>
        <xs:element name="NoBUs" nillable="false">
            <xs:annotation>
                <xs:documentation>Number of Billing Units within the Piece Document submitted</xs:documentation>
            </xs:annotation>
            <xs:simpleType>
                <xs:restriction base="xs:string">
                    <xs:minLength value="1"/>
                    <xs:maxLength value="4"/>
                    <xs:pattern value="[0-9]+"/>
                </xs:restriction>
            </xs:simpleType>
        </xs:element>
        <xs:element name="Preceded" type="YNflag" nillable="false">
            <xs:annotation>
                <xs:documentation>Preceded or accompanied by prospectus - valid value ("Y", "N")</xs:documentation>
            </xs:annotation>
        </xs:element>
        <xs:element name="DateOfFirstUse" type="dateVal" nillable="false">
            <xs:annotation>
                <xs:documentation>Date of First Uses in MM/DD/YYYY format</xs:documentation>
            </xs:annotation>
        </xs:element>
        <xs:element name="PrincipalTitle" nillable="false">
            <xs:annotation>
                <xs:documentation>Job Title of Registered Principal</xs:documentation>
            </xs:annotation>
            <xs:simpleType>
                <xs:restriction base="xs:string">
                    <xs:maxLength value="50"/>
                </xs:restriction>
            </xs:simpleType>
        </xs:element>
        <xs:element name="PrincipalID" nillable="false">
            <xs:annotation>
                <xs:documentation>CRD ID of Registered Principal</xs:documentation>
            </xs:annotation>
            <xs:simpleType>
                <xs:restriction base="xs:string">
                    <xs:minLength value="4"/>
                    <xs:maxLength value="12"/>
                    <xs:pattern value="[0-9]+"/>
                </xs:restriction>
            </xs:simpleType>
        </xs:element>
        <xs:element name="DateOfApproval" type="dateVal" nillable="false">
            <xs:annotation>
                <xs:documentation>Approval Date in "MM/DD/YYYY" format</xs:documentation>
            </xs:annotation>
        </xs:element>
        <xs:element name="FirmExternalRef" nillable="true">
```

```
    <xs:annotation>
        <xs:documentation>Firm External Reference Number</xs:documentation>
    </xs:annotation>
    <xs:simpleType>
        <xs:restriction base="xs:string">
            <xs:maxLength value="50"/>
        </xs:restriction>
    </xs:simpleType>
</xs:element>
<xs:element name="RelatedFINRARef" nillable="true">
    <xs:annotation>
        <xs:documentation>Related FINRA Reference number</xs:documentation>
    </xs:annotation>
    <xs:simpleType>
        <xs:restriction base="xs:string">
            <xs:pattern value="(f|F)(R|r|X|x)20\d{2}-(0[1-9]|1[012])(0[1-9]|[12][0-9]|3[01])-\d{4}"/>
            <xs:pattern value=""/>
        </xs:restriction>
    </xs:simpleType>
</xs:element>
<xs:element name="CommunicationUses" nillable="true">
    <xs:annotation>
        <xs:documentation>Explanation how to use communication</xs:documentation>
    </xs:annotation>
    <xs:simpleType>
        <xs:restriction base="xs:string">
            <xs:maxLength value="31500"/>
        </xs:restriction>
    </xs:simpleType>
</xs:element>
<xs:element name="DeliveryMethod" nillable="false">
    <xs:annotation>
        <xs:documentation>Delivery Method</xs:documentation>
    </xs:annotation>
    <xs:simpleType>
        <xs:restriction base="xs:string">
            <xs:minLength value="1"/>
            <xs:maxLength value="8"/>
            <xs:pattern value="[A-Za-z0-9 /]+"/>
        </xs:restriction>
    </xs:simpleType>
</xs:element>
<xs:element name="RuleDefn" nillable="false">
    <xs:annotation>
        <xs:documentation>Rule Definition</xs:documentation>
    </xs:annotation>
    <xs:simpleType>
        <xs:restriction base="xs:string">
            <xs:minLength value="1"/>
            <xs:maxLength value="8"/>
            <xs:pattern value="[A-Za-z0-9]+"/>
        </xs:restriction>
    </xs:simpleType>
</xs:element>
<xs:element name="TmpltUpdt" type="YNflag" nillable="false" minOccurs="0" maxOccurs="1">
    <xs:annotation>
        <xs:documentation>Update to previously reviewed template? - Defaults to "N"</xs:documentation>
    </xs:annotation>
</xs:element>
<xs:element name="GnrcNvsmt" type="YNflag" nillable="false" minOccurs="0" maxOccurs="1">
    <xs:annotation>
        <xs:documentation>Generic Investment Company Communication? - Defaults to "N"</xs:documentation>
    </xs:annotation>
</xs:element>
<xs:element name="SmAnnlRpt" type="YNflag" nillable="false" minOccurs="0" maxOccurs="1">
    <xs:annotation>
        <xs:documentation>Semi-annual or annual report? - Defaults to "N"</xs:documentation>
    </xs:annotation>
</xs:element>
<xs:element name="Product" nillable="false" minOccurs="1" maxOccurs="unbounded">
```

```xml
            <xs:annotation>
                <xs:documentation>Enter each Product Code that applies to the communication (1 is required).</xs:documentation>
            </xs:annotation>
            <xs:simpleType>
                <xs:restriction base="xs:string">
                    <xs:minLength value="1"/>
                    <xs:maxLength value="8"/>
                    <xs:pattern value="[A-Za-z0-9]+"/>
                </xs:restriction>
            </xs:simpleType>
        </xs:element>
        <xs:element name="RegisteredRep" nillable="true" minOccurs="0" maxOccurs="5">
            <xs:annotation>
                <xs:documentation>Registered Rep. IDs associated to the communication.</xs:documentation>
            </xs:annotation>
            <xs:simpleType>
                <xs:restriction base="xs:string">
                    <xs:maxLength value="12"/>
                </xs:restriction>
            </xs:simpleType>
        </xs:element>
        <xs:element name="WtgReviewlttr" type="YNflag" nillable="false">
            <xs:annotation>
                <xs:documentation>Waiting Review Letter for the submitted communication - valid value ("Y", "N")</xs:documentation>
            </xs:annotation>
        </xs:element>
        <xs:element name="IncludesPerfRanking" type="xs:string" nillable="true" minOccurs="0" maxOccurs="1">
            <xs:annotation>
                <xs:documentation>Element has been deprecated, values no longer processed.</xs:documentation>
            </xs:annotation>
        </xs:element>
        <xs:element name="AddtnlInfo" minOccurs="0" maxOccurs="unbounded">
            <xs:complexType>
                <xs:sequence>
                    <xs:element name="AIFileNm" type="fileNm" nillable="false">
                        <xs:annotation>
                            <xs:documentation>Full name of a file containing additional information</xs:documentation>
                        </xs:annotation>
                    </xs:element>
                    <xs:element name="CommPurpsCd" nillable="false">
                        <xs:annotation>
                            <xs:documentation>Communication Purpose Code for the information attached</xs:documentation>
                        </xs:annotation>
                        <xs:simpleType>
                            <xs:restriction base="xs:string">
                                <xs:minLength value="4"/>
                                <xs:maxLength value="8"/>
                                <xs:pattern value="[A-Za-z0-9]+"/>
                            </xs:restriction>
                        </xs:simpleType>
                    </xs:element>
                    <xs:element name="NotesTx" nillable="true" minOccurs="0" maxOccurs="1">
                        <xs:annotation>
                            <xs:documentation>Any text to explain or put in context the information attached</xs:documentation>
                        </xs:annotation>
                        <xs:simpleType>
                            <xs:restriction base="xs:string">
                                <xs:maxLength value="4000"/>
                            </xs:restriction>
                        </xs:simpleType>
                    </xs:element>
                </xs:sequence>
            </xs:complexType>
        </xs:element>
    </xs:sequence>
    </xs:complexType>
    </xs:element>
</xs:schema>
```

Appendix D: Filing Reports

Accepted Filing Examples

Text Version of the Report

<div align="center">ADVERTISING BATCH SUBMISSION – FILING REPORT</div>

FIRM ID: 123456
FIRM NAME: FINRA TEST FIRM NAME
FINRA JOB ID: 35761
FIRM FILE NAME: filename.mdata
FIRM UNIQUE COMMUNICATION ID: As provided in mdata file tag <CommId>
FIRM EXTERNAL REFERENCE: As provided in mdata file tag <FirmExternalRef>
COMMUNICATION TITLE: As provided in mdata file tag <Title>
RECEIVED AT: 4/6/2016 4:42:00 PM
COMPLETED AT: 4/6/2016 4:47:59 PM
COMMUNICATION STATUS: ACCEPTED
FINRA REFERENCE NUMBER: FR2016-0406-0001/B
ESTIMATED FILING FEE: $1,250

XML Version of the Report

```xml
<?xml version="1.0" encoding="UTF-8"?>
<ADVBatchUploadReport xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance">
      <<ReportTitle>ADVERTISING BATCH SUBMISSION – FILING REPORT</ReportTitle>
      <FirmID>123456</FirmID>
      <FirmName>FINRA TEST FIRM NAME</FirmName>
      <FINRAJobID>35761</FINRAJobID>
      <FirmFileName>filename.mdata</FirmFileName>
      <CommId>As provided in mdata file</CommId>
      <ExternalRef>As provided in mdata file</ExternalRef>
      <CommTitle>As provided in mdata file</CommTitle>
      <RcvdAt>4/6/2016 4:42:00 PM</RcvdAt>
      <CompletedAt>4/6/2016 4:47:59 PM</CompletedAt>
      <CommStatus>ACCEPTED</CommStatus>
      <FINRARefNum>FR2016-0406-0001/B</FINRARefNum>
      <EstimatedFee>$1,250</EstimatedFee>
</ADVBatchUploadReport>
```

Rejected Filing Examples

Text Version of the Report

ADVERTISING BATCH SUBMISSION - FILING REPORT

FIRM ID: 456789
FIRM NAME: FINRA TEST FIRM NAME 2
FINRA JOB ID: 35790
FIRM FILE NAME: filename2.mdata
FIRM UNIQUE COMMUNICATION ID: As provided in mdata file tag <CommId>
FIRM EXTERNAL REFERENCE: As provided in mdata file tag <FirmExternalRef>
COMMUNICATION TITLE: As provided in mdata file tag <Title>
RECEIVED AT: 4/6/2016 4:51:00 PM
COMPLETED AT: 4/6/2016 4:58:59 PM
COMMUNICATION STATUS: REJECTED
ERROR MESSAGES:
          Error Message 1
          Error Message 2
          Error Message 3

XML Version of the Report

```xml
<?xml version="1.0" encoding="UTF-8"?>
<ADVBatchUploadReport xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance">
       <<ReportTitle>ADVERTISING BATCH SUBMISSION – FILING REPORT</ReportTitle>
       <FirmID>456789</FirmID>
       <FirmName>FINRA TEST FIRM NAME 2</FirmName>
       <FINRAJobID>35790</FINRAJobID>
       <FirmFileName>filename2.mdata</FirmFileName>
       <CommId>As provided in mdata file</CommId>
       <ExternalRef>As provided in mdata file</ExternalRef>
       <CommTitle>As provided in mdata file</CommTitle>
       <RcvdAt>4/6/2016 4:51:00 PM</RcvdAt>
       <CompletedAt>4/6/2016 4:58:59 PM</CompletedAt>
       <CommStatus>REJECTED</CommStatus>
       <ErrorMsg>Error Message 1</ErrorMsg>
       <ErrorMsg>Error Message 2</ErrorMsg>
       <ErrorMsg>Error Message 3</ErrorMsg>
  </ADVBatchUploadReport>
```

NOTE: In the case of receiving a submission that fails XSD validation, the <CommId>, <ExternalRef> and the <CommTitle> will be empty as we cannot reliably parse the .mdata file, and the <CommStatus> value will be 'XSD REJETESTD'.

```xml
<?xml version="1.0" encoding="UTF-8"?>
<xs:schema xmlns:xs="http://www.w3.org/2001/XMLSchema" elementFormDefault="qualified" id="AREFReport">
  <xs:element name="ADVBatchUploadReport">
    <xs:complexType>
      <xs:sequence>
        <xs:element name="ReportTitle" type="xs:string"></xs:element>
        <xs:element name="FirmID" type="xs:string"/>
        <xs:element name="FirmName" type="xs:string"/>
        <xs:element name="FINRAJobID" type="xs:string"/>
        <xs:element name="FirmFileName" type="xs:string"/>
        <xs:element name="CommId" type="xs:string" nillable="true" minOccurs="0" maxOccurs="1"/>
        <xs:element name="ExternalRef" type="xs:string" nillable="true" minOccurs="0" maxOccurs="1"/>
        <xs:element name="CommTitle" type="xs:string" nillable="true" minOccurs="0" maxOccurs="1"/>
        <xs:element name="RcvdAt" type="xs:string"/>
        <xs:element name="CompletedAt" type="xs:string"/>
        <xs:element name="CommStatus" type="xs:string"/>
        <xs:element name="FINRARefNum" type="xs:string" minOccurs="0" maxOccurs="1"/>
        <xs:element name="EstimatedFee" type="xs:string" minOccurs="0" maxOccurs="1"/>
        <xs:element name="ErrorMsg" type="xs:string" minOccurs="0" maxOccurs="unbounded"/>
      </xs:sequence>
    </xs:complexType>
  </xs:element>
</xs:schema>
```

Appendix F: Advertising Environment Summary

	Lower QA Test Environment (a mirror of production, BUT WITH A DIFFERENT DATABASE OF CREDENTIALS)	**Production**
To get FTP credentials ("**ADV File Transfer**" entitlement)	e-mail your request to Advertising-Technology@finra.org	Read the page http://www.finra.org/Industry/Compliance/Entitlement/P121158 and follow instructions under "Entitlement Information for File Transfer Applications FTP Users"
To validate your FTP Credentials **To connect via FTP**	filex-int.qa.finra.org	filex.finra.org
To change your FTP password	https://accountmgmt-qc1.finra.org/myews/changepassword.jsp	https://accountmgmt.finra.org/myews/changepassword.jsp
To get EWS (website) credentials	Contact your firm's EWS SAA (Super Account Administrator) and request that he or she grant access for the "Reg – Advertising Regulation" entitlement	
SFTP server IP address	52.201.46.30 52.70.2.197	52.207.197.35 35.171.199.181