Technical Guidance Document for 17 CFR Parts 15, 17, 18, and 20 Ownership and Control Reports, Forms 102/102S, 40/40S, and 71

Ownership and Control Reports

Forms 102A/102B/102S, 40/40S, and 71

Technical Guidance Document

April 13, 2016

Version 5



CFTC

Commodity Futures Trading Commission

This Technical Guidance Document (the "Technical Document") provides technical specifications for transmitting Forms 102A, 102B, 102S, 40 and 71 via FTP XML submissions. This Technical Document is for informational use only, and is not a legal document. It is intended as a supplement to the OCR Final Rule (as defined below), which rule contains the regulatory requirements applicable to parties submitting the forms described

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above. When reviewing this Technical Document, reporting parties should review and consult the OCR Final Rule, including the requirements of the reporting forms attached as an appendix thereto. This Technical Document was drafted consistent with the OCR Final Rule, and all relevant communications from Commission staff are also intended to be consistent with the OCR Final Rule. In the event of any conflict between the requirements of the OCR Final Rule (including the questions and instructions on the reporting forms attached thereto) and either (a) this Technical Document or (b) any verbal communications by Commission staff regarding this Technical Document or the OCR Final Rule, the OCR Final Rule controls.

The OMB control number for the collection of information pursuant to the OCR Final Rule is 3038-0103. Please be advised that pursuant to 5 CFR § 1320.5(b)(2)(i), you are not required to respond to the collection of information pursuant to the OCR Final Rule unless it displays a currently valid OMB control number.

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Change Log

Version	Date	Change
2	2/20/2014	ORGTYPE variable removed from file name, and replaced with "OCR" for all file names, to simplify file naming process. See "Name the File(s) for XML submission"
2	2/20/2014	Additional Secure FTP instructions added. See "Connect to CFTC with Secure FTP"
2	2/20/2014	Valid values provided for the reporting market required in Form 102A, question 9. See row 82 in Form 102A schema.
2	2/20/2014	Erroneous line removed in Appendix A: SFTP Account Registration.
3	4/29/2014	Modified file naming convention to remove static "OCR" value. See "Name the File(s) for XML submission"
3	4/29/2014	Modified field length for Identifier field in file name. See "Name the File(s) for XML submission"
3	4/29/2014	Consolidated cftcBatch attributes and moved to new cftcHeader element. See rows 1-4 in "Data Dictionary for OCR Batch Header"
3	4/29/2014	Added formCount element to cftcHeader. See row 5 in "Data Dictionary for OCR Batch Header"
3	4/29/2014	Modified formNumber element to be a required element. See row 1 in "Data Dictionary for Form 102 Cover Sheet"
3	4/29/2014	Added entityType attribute to cftcForm102 element. See row 5 in "Data Dictionary for Form 102 Cover Sheet"
3	4/29/2014	Added 'Ownership of a reportable position' as a valid value for originReason element. See rows 2 and 5 in Form 102A schema
3	4/29/2014	Fixed erroneous XML reference in row 14 of Form 102A schema
3	4/29/2014	Moved marketIdentifier attribute to relatedAcctInfo element, to permit reporting of multiple reporting markets in connection with a single trading account. See row 82 in Form 102A schema and row 5 in 102B schema.
3	4/29/2014	Fixed erroneous references in question for reporting firms that are foreign brokers. See row 154 in Form 102A schema
3	4/29/2014	Added signature elements for each 102 form submission. See, e.g., rows 170-177 in Form 102A schema
3	4/29/2014	Added paired swap and swaption indicators for 102S submissions. See rows 81-82 in Form 102S schema
3	4/29/2014	Updated signature blocks in Form 40 schema. See rows 221-228
3	4/29/2014	Removed duplicative row in Supplemental List III in Appendix B
4	7/1/2014	Added ISO 3166-2 standard as valid value for state/subdivision fields. See, e.g., row 10 in Form 102 Coversheet
4	7/1/2014	Added ISO 3166-1 alpha-2 standard as valid value for country fields. See, e.g., row 11 in Form 102 Coversheet

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4	7/1/2014	Added Middle Name and Suffix fields for Special Account Owner and Controller contact information. See rows 25-26 and 52-53 in Form 102A schema
4	7/1/2014	Moved Volume Threshold Account information fields on form 102B from relatedAccount element to cftcForm102 element. See, e.g., row 2 in Form 102B schema
4	7/1/2014	Moved Volume Threshold Account Originator, Owner and Controller relatedEntity element under cftcForm102. See, e.g., row 9 in Form 102B schema
4	7/1/2014	Added relatedAcctInfo element under cftcForm102 element. See row 4 in Form 102B schema
4	7/1/2014	Added isSpecialAccount attribute on cftcForm102 element. See row 3 in Form 102S schema
4	7/1/2014	Moved Consolidated Account information fields on form 102S from relatedAccount element to cftcForm102 element. See, e.g., row 3 in Form 102S schema
4	7/1/2014	Moved Consolidated Account Originator, Owner and Controller relatedEntity element under cftcForm102. See, e.g., row 5 in Form 102S schema
4	7/1/2014	Added pairedSwapOrSwaptionActivity element under cftcForm102 element. See rows 82-84 in Form 102S schema
5	4/13/2016	Added optional tracking identifier field on filename. See "Name the File(s) for XML submission"
5	4/13/2016	Added footnote reference for countries that do not have a zip code. See, e.g., row 12 in the Form 102 cover sheet schema
5	4/13/2016	Fixed erroneous XML reference for Volume Threshold trading account number. See row 2 if Form 102B schema
5	4/13/2016	Modified various contact fields related to trading account controller as optional on Question 10(iii) of Form 102A. See rows 151,152,155,156,157 of Form 102A schema
5	4/13/2016	Modified various contact fields related to trading account controller as optional on Question 6 of Form 102B. See rows 70,71,74,75,76 of Form 102B schema
5	4/13/2016	Added ClientReportingIssue attribute to identify data reporting quality for trading account controller fields on the Form 102A and Form 102B. See, e.g., row 141 of Form 102A schema
5	4/13/2016	Added isCounterparty attribute to identify the entity who is the counterparty on the Form 102S. See row 30 of Form 102S schema
5	4/13/2016	Added foreignPrivacyException attribute to identify contact fields that are covered by foreign privacy-protection laws. See row 31 of Form 102S schema

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Introduction

On November 18, 2013, the Commodity Futures Trading Commission ("Commission" or "CFTC") adopted new rules and related forms to enhance its identification of futures and swap market participants (the "OCR Final Rule"). These final rules leverage the Commission's current position and transaction reporting programs by requiring the electronic submission of trader identification and market participant data on amended Forms 102 and 40, and on new Form 71. The new and amended forms require the reporting of certain trading accounts active on reporting markets that are designated contract markets or swap execution facilities. Among other information, the forms collect ownership and control information with respect to both position-based special accounts and trading accounts that meet specified volume-based reporting levels.

This Technical Document is intended to provide technical specifications for transmitting Forms 102A, 102B, 102S, 40 and 71 via FTP XML submissions. At a later date, either an additional guidance document or an updated version of this document will be provided for registration and submission procedures in connection with the web-based CFTC Portal.

OCR Final Rule

When reviewing this Technical Document, reporting parties should review and consult the OCR Final Rule, including the requirements of the reporting forms attached as an appendix thereto. Reporting parties should visit this link¹ to view the OCR Final Rule on the Federal Register; visit this link² to view a pdf copy of the OCR Final Rule.

Technical Requirements

Please forward questions regarding format, content, and transmission of OCR data submissions to the CFTC at OCRTechSupport@cftc.gov.

OCR Submission Procedure(s)

There are two methods for submission of OCR related data – 1. CFTC Secure FTP or 2. CFTC Portal Electronic Form:³

CFTC Secure FTP

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 $[\]frac{1}{\text{https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71}{\text{https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71}{\text{https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71}{\text{https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71}{\text{https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71}{\text{https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71}{\text{https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71}{\text{https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71}{\text{https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71}{\text{https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71}{\text{https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-and-71}{\text{https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-and-71}{\text{https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-and-71}{\text{https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-and-71}{\text{https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-and-71}{\text{https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-71}{\text{https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-articles/2013/11/18/2013-26789/ownership-articles/2013/11/18/2013-$

 $^{^2\ \}underline{http://www.cftc.gov/ucm/groups/public/@lrfederalregister/documents/file/2013-26789a.pdf}$

³ See preceding Introduction for information regarding guidance on the Portal.

- 1. Create the report(s) and consolidate the report(s) into an XML-formatted file.
- 2. Name the file(s) using the OCR Reporting file name format.
- 3. Assemble and compress the files.
- 4. Connect to the CFTC FTP site.
- 5. Transmit the electronically formatted records to the Commission using Secure FTP.

Name the File(s) for XML submission

File Naming Convention - Batch Submission

• The file name for submission should be created in the following manner:

OCRFORM_[FORMNUMBER]_[IDENTIFIER]_[YYYYMMDD]_[SOURCE]_[TRACKING].format

File Naming Convention - Test Files

 Data providers can test their submissions by appending the string "TEST" to the end of their file names.

OCRFORM_[FORMNUMBER]_[IDENTIFIER]_[YYYYMMDD]_[SOURCE]_[TRACKING]_TEST.format

Your firm can contact our Technical Support representative at OCRTechSupport@cftc.gov to verify the results of test data you have submitted.

FORMNUMBER:

Form Number Submitted in File	FORMNUMBER in File Name
Form 102a, 102b, or 102s	102
Form 71	71
Form 40	40

For each different form number submitted send a separate XML file. For example, if you are submitting both a Form 102 and 71, they should be separate XML files. Also note for multiple submissions of the same form number they can be included in a single XML file. For example, if you are submitting multiple Form 102s, they can be in a single XML file.

IDENTIFIER:

This field is the 3 character identifier provided by the CFTC during the account registration process.

YYYYMMDD:

This field is the year (4 digits), month, and day of the report date.

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SOURCE:

This field is the 1 character identifier which will be used to identify the origination of the file.

File Origination	SOURCE in Filename
Secure FTP Batch Submission	Е

FORMAT:

Format of the File	FORMAT in Filename
XML	formxml

TRACKING:

This field is optional. Reporting firms may use this field to supply an internal tracking number to tie back to their internal systems.

Assemble and Compress the File(s)

The files should be compressed using an industry compression tool. Possible compression utilities are WinZip or GZIP. WinZip is available at http://www.gzip.org. and the GZIP utility is freely available at http://www.gzip.org.

Connect to CFTC with Secure FTP

The CFTC uses Secure FTP (SFTP) to receive files. Reporting parties that are transmitting files to the CFTC will need to obtain a Secure FTP client that is FIPS 140-2 compliant. Through the Secure FTP client, reporters can navigate to traders.cftc.gov and use their User ID and password to login and transmit XML submission files.

Reporting parties' SFTP account is already configured to require a password. If reporters want to bypass the password requirement, they will need to generate a Key Pair and send an email to FtpSupport@cftc.gov which issues reporters' Public Key and User ID. Reporters should keep their Private Key secure and only use it to communicate with the CFTC. The CFTC can accept two types of Keys: SSH Version 2.0 RSA key pair with bit strength between 2048 - 4096 or SSH Version 2.0 DSA 1024 bit key pair.

Many OCR reporting parties may already have FTP or SFTP accounts. Reporting parties with SFTP accounts can continue to use those accounts for OCR reporting. New reporters who do not already have an SFTP account, or reporters who only use non-secure FTP accounts, must request a Secure FTP account from the CFTC. See Appendix A to this Technical Document for FTP registration steps.

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Transmit the File(s)

Transfer the compressed file(s) using normal FTP commands.

Upon receipt of the file, software at the CFTC will ingest the file through our firewall and begin processing the data.

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Data Dictionary for OCR Batch Header

	Data Dictionary for OCR Batch Header- Data Element	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
1.	Message Transmit Datetime	Yes	Date of OCR Batch Submission	The format is YYYY-MM-DDThh:mm:ss[+ -]hh:mm, where YYYY is the year, MM is the month, DD is the day of the month, hh is the hour of the day, mm is the minute of the hour and [+ -]hh:mm is the time zone offset.	cftcBatch/cftcHeader@sentDate
2.	Submission Contact Email	Yes	Contact email for Batch Submission		cftcBatch/cftcHeader@email
3.	Submission Sent By Identifier	Yes	This field is the 3 character identifier provided by the CFTC during the account registration process for firm submitting batch file		cftcBatch/cftcHeader@sentBy

	Data Dictionary for OCR Batch Header- Data Element	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
4.	On Behalf of identifier	No	CFTC-issued 3 character reporting firm identifier for firm reported in submission		cftcBatch/cftcHeader@onBehalfOf
5.	Form Count	Yes	Identifies number of form submissions included in batch		cftcBatch/cftcHeader@formCount

Data Dictionary for Form 102 Cover Sheet

	Data Dictionary for Form 102 Cover Sheet- Data Element	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
1.	Form Number	Yes		102	cftcBatch/cftcForm102@formNumber
2.	Reportable Account Type Indicator	Yes	Indicates the type of account for which the reporting entity is	SA = Special Account (102A) VT = Volume Threshold Account	cftcBatch/cftcForm102@accountCategory

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	Data Dictionary for Form 102 Cover Sheet- Data Element	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			reporting.	(102B) CA = Consolidated Account (102S)	
3.	Follow-On Information Will be Submitted Later	Yes	Indicates certain "Follow-On Information" will be submitted by a later date specified in § 17.02 ⁴	Y = Yes N = No	cftcBatch/cftcForm102@FollowOnInformationToCo me
4.	Optional Fields or Supplemental Fields Reported to LEI Provider	Yes	Indicates that one or more "Optional Fields" or "Supplemental Fields" not included in this submission were reported to the CICI Utility (or other CFTC-approved LEI provider) and are associated with the	Y = Yes N = No	cftcBatch/cftcForm102@OptionalOrSuppFieldsSepa ratelyReported

⁴ For additional information on "Follow-On Information", "Optional Fields" and "Supplemental Fields", see the footnotes to the reporting forms in Appendix A of the OCR Final Rule.

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	Data Dictionary for Form 102 Cover Sheet- Data Element	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			LEI provided in this submission		
5.	Reporting Firm Entity Type	Conditional. Required if OptionalOrSuppFie IdsSeparatelyRepor ted ='N'	Entity type of the reporting entity	LE = Legal Entity	cftcBatch/cftcForm102@entityType
6.	Name of Reporting Firm	Conditional. Required if OptionalOrSuppFie ldsSeparatelyRepor ted ='N'	Legal name of the reporting entity		cftcBatch/cftcForm102@legalEntityName
7.	Reporting Firm Street Address	Conditional. Required if OptionalOrSuppFie ldsSeparatelyRepor ted ='N'	Street address of the reporting entity		cftcBatch/cftcForm102@street
8.	Reporting Firm Suite	No	Suite of the reporting entity		cftcBatch/cftcForm102@suite
9.	Reporting Firm City	Conditional. Required if OptionalOrSuppFie IdsSeparatelyRepor ted ='N'	City of the reporting entity		cftcBatch/cftcForm102@city

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	Data Dictionary for Form 102 Cover Sheet- Data Element	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
10.	Reporting Firm State	Conditional. Required if OptionalOrSuppFie IdsSeparatelyRepor ted ='N'	State/Subdivision of the reporting entity	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters	cftcBatch/cftcForm102@state
11.	Reporting Firm Country	Conditional. Required if OptionalOrSuppFie ldsSeparatelyRepor ted ='N'	Country of the reporting entity	ISO 3166-1 alpha-2 country code	cftcBatch/cftcForm102@country
12.	Reporting Firm Zip/Postal Code	Conditional. Required if OptionalOrSuppFie ldsSeparatelyRepor ted ='N'5	Zip code or postal code of the reporting entity		cftcBatch/cftcForm102@postalCode
13.	Reporting Firm Contact Natural Person Last Name	Conditional. Required if OptionalOrSuppFie ldsSeparatelyRepor ted ='N'	Surname of the natural person who is a contact at the reporting entity		cftcBatch/cftcForm102/contact@lastName
14.	Reporting Firm Contact Natural	Conditional. Required if OptionalOrSuppFie	Given or first in order name of the natural person		cftcBatch/cftcForm102/contact@firstName

⁵ For countries that do not have a zip/postal code, the postalCode attribute is not required

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	Data Dictionary for Form 102 Cover Sheet- Data Element	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Person First Name	ldsSeparatelyRepor ted ='N'	who is a contact at the reporting entity		
15.	Reporting Firm Contact Middle Name	No	Middle name of the natural person who is a contact at the reporting entity		cftcBatch/cftcForm102/contact@middleName
16.	Reporting Firm Contact Suffix	No	Suffix of the natural person who is a contact at the reporting entity		cftcBatch/cftcForm102/contact@nameSuffix
17.	Reporting Firm Contact Job Title	Conditional. Required if OptionalOrSuppFie IdsSeparatelyRepor ted ='N'	Job title of the contact at the reporting entity		cftcBatch/cftcForm102/contact@titleOrPosition
18.	Reporting Firm Contact Phone Number	Conditional. Required if OptionalOrSuppFie IdsSeparatelyRepor ted ='N'	Telephone number of the contact at the reporting entity		cftcBatch/cftcForm102/contact@telephone
19.	Reporting Firm Contact Email Address	Conditional. Required if OptionalOrSuppFie	Email address of the contact at the reporting entity		cftcBatch/cftcForm102/contact@email

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	Data Dictionary for Form 102 Cover Sheet- Data Element	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
		ldsSeparatelyRepor ted ='N'			
20.	Reporting Firm Website	Conditional. Required if information available AND OptionalOrSuppFie ldsSeparatelyRepor ted ='N'	URL of the reporting entity's website		cftcBatch/cftcForm102@website
21.	Reporting Firm NFA ID	Conditional. Required if information available AND OptionalOrSuppFie IdsSeparatelyRepor ted ='N'	The identification number given to the reporting entity by the National Futures Association		cftcBatch/cftcForm102@NFAIdentifier
22.	Reporting Firm Legal Entity Identifier	Conditional. Required if OptionalOrSuppFie IdsSeparatelyRepor ted ='Y'	The legal entity identifier (LEI) assigned to the reporting firm by the LEI issuer		cftcBatch/cftcForm102@legalEntityIdentifier

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	Data Dictionary for Form 102 Cover Sheet- Data Element	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
23.	Reporting Firm Type – futures commission merchant	Conditional. Required if OptionalOrSuppFie IdsSeparatelyRepor ted ='N'	Indicates the type of reporting entity ⁶	Y = Yes N = No	cftcBatch/cftcForm102@isFCM
24.	Reporting Firm Type – clearing member	Conditional. Required if OptionalOrSuppFie IdsSeparatelyRepor ted ='N'	Indicates the type of reporting entity	Y = Yes N = No	cftcBatch/cftcForm102@isCM
25.	Reporting Firm Type – Foreign Broker	Conditional. Required if OptionalOrSuppFie IdsSeparatelyRepor ted ='N'	Indicates the type of reporting entity	Y = Yes N = No	cftcBatch/cftcForm102@isFB
26.	Reporting Firm Type – Swap Dealer	Conditional. Required if OptionalOrSuppFie IdsSeparatelyRepor ted ='N'	Indicates the type of reporting entity	Y = Yes N = No	cftcBatch/cftcForm102@isSwapDealer

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⁶ If a reporting party is submitting a 102A and reporting a special account that is active on multiple markets, the party should check multiple firm types in rows 23-26, if it acts in different capacities on these markets (for example, if the reporting party acts as an FCM on one of the markets, and acts as a clearing member on another of the markets).

	Data Dictionary for Form 102 Cover Sheet- Data Element	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
27.	Reporting Firm Type – Other	Conditional. Required if OptionalOrSuppFie ldsSeparatelyRepor ted ='N'	Indicates the type of reporting entity	Y = Yes N = No	cftcBatch/cftcForm102@isOther
28.	Other Reporting Firm Type	Conditional. Required if isOther = 'Y'	Entity type of the reporting entity if isOther Indicator was selected		cftcBatch/cftcForm102@otherDescription
29.	Reporting Firm ID	Conditional. Required if OptionalOrSuppFie IdsSeparatelyRepor ted ='N'	The alpha-numeric identifier assigned by the Commission to the reporting entity		cftcBatch/cftcForm102@reportingIdentifier

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Data Dictionary for Form 102A – Identifying and reporting a special account⁷

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
1.	New/Modified Indicator	Question 1	Yes	Indicates whether the special account (102A) is: • Special account being reported for the first time • Resubmitted or modified Informatio	N = New M = Modified	cftcBatch/cftcForm102@infor mationType

⁷ When reviewing the data elements in this Technical Document, reporting parties should also review and consult the OCR Final Rule, including the requirements of the reporting forms attached as an appendix thereto. The reporting forms are the basis for these data elements. Reporting parties should visit this link to view the OCR Final Rule on the Federal Register: https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71

Visit this link to view a pdf copy of the OCR Final Rule: http://www.cftc.gov/ucm/groups/public/@lrfederalregister/documents/file/2013-26789a.pdf

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				n for a previously reported special account		
2.	Special Account Origination	Question 2	Yes	Indicates for which of the following reasons the account is being reported	OO = Ownership of a reportable position ⁸ CC = Control of a reportable position OC = Ownership and control of a reportable position OM = Omnibus account with a reportable position	cftcBatch/cftcForm102@origin Reason
3.	Special Account Number	Question 3	Yes	Numeric identifier used by the reporting entity to		cftcBatch/cftcForm102@acco untNumber

⁸ 'Ownership of a reportable position' has been added to make the schema conform to the choices in question 2 of Form 102A, which is included as an appendix to the OCR Final Rule. As noted in question 2 of Form 102A, however, reporting parties are not required to submit Form 102A based solely on ownership of a reportable position at this time.

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				uniquely identify a special account		
4.	Special Account Name	Question 3	Yes	The name of the special account assigned by the reporting firm		cftcBatch/cftcForm102@acco untName
5.	House or Customer Indicator	Question 4	Conditional. Required if originReason='OO'	If the reported special account is being reported based on ownership of a reportable position, indicates whether the special account is a house or customer account of the reporting firm ⁹	H = House C = Customer	cftcBatch/cftcForm102@acco untClass
6.	Omnibus Account	Question 5	Conditional, if originReason='OM' then 'Y' else 'N'	Indicates if the reported special account is an omnibus account	Y = Yes N = No	cftcBatch/cftcForm102@isOm nibus
7.	Omnibus Account	Question 5	Conditional. Required if	If the reported special account is	H = House C = Customer	cftcBatch/cftcForm102@acco untClass

⁹ See preceding footnote.

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Information		originReason='OM'	an omnibus account, indicate whether the account is a house or customer omnibus account		
SPEC	IAL ACCOUNT (OWNER(S) CONTACT	INFORMATION			
8.	Special Account Owner Indicator	Question 6	Conditional, if originReason='OC' then isOwner = 'Y'	Indicates reporting special account owner	Y = Yes N = No	cftcBatch/cftcForm102/relate dEntity@isOwner
9.	Foreign Privacy Law Exception Indicator	Question 6	Conditional. Required if originReason='OC'	Identifies if reported special account owner data is covered by foreign privacy-protection laws	Y = Yes N = No	cftcBatch/cftcForm102/relate dEntity@foreignPrivacyExcepti on
10.	Special Account Owner Type Indicator	Question 6	Conditional. Required if originReason='OC'	Indicates whether the special account owner is a legal entity or natural person	LE = Legal Entity NP = Natural Person	cftcBatch/cftcForm102/relate dEntity@entityType
11.	Special Account Owner Optional	Question 6	Conditional. Required if originReason='OC'	Indicates that one or more "Optional Fields" or "Supplemental	Y = Yes N = No	cftcBatch/cftcForm102/ relatedEntity@ OptionalOrSuppFieldsSeparate lyReported

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
IF SP	Fields or Supplemental Fields Reported to LEI Provider	T OWNER IS A LE	CAI FNTITY	Fields" not included in this question were reported to the CICI Utility (or other CFTC-approved LEI provider) and are associated with the LEI provided in this submission		
12.	Special Account Owner Legal Entity Name	Question 6	Conditional. Required if originReason='OC' AND OptionalOrSuppFie ldsSeparatelyRepor ted ='N' AND entityType='LE' AND foreignPrivacyExce ption='N'	Legal or registered name of the reportable account owner		cftcBatch/cftcForm102/relate dEntity@legalEntityName

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
13.	Special Account Owner Natural Person Last Name	Question 6	Conditional. Required if originReason='OC' AND OptionalOrSuppFie IdsSeparatelyRepor ted ='N' And entityType='NP' AND foreignPrivacyExce ption='N'	Surname of the natural person reportable account owner		cftcBatch/cftcForm102/relate dEntity@lastName
14.	Special Account Owner Natural Person First Name	Question 6	Conditional. Required if originReason='OC' AND OptionalOrSuppFie IdsSeparatelyRepor ted ='N' AND entityType='NP' AND foreignPrivacyExce ption='N'	Given or first in order name of the natural person reportable account owner		cftcBatch/cftcForm102/relate dEntity@firstName
15.	Special Account Owner Natural Person Middle	Question 6	Conditional. Required if information is available AND	Middle name of the natural person reportable account owner		cftcBatch/cftcForm102/relate dEntity@middleName

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Data	Form 102A	Required	CFTC	Valid Values	XML
Element	Question Number		Description, Purpose or Instruction		
Name		originReason='OC' AND OptionalOrSuppFie IdsSeparatelyRepor ted ='N' AND entityType='NP' AND foreignPrivacyExce ption='N'			
Account Owner Natura Person Suffix	Question 6	Conditional. Required if information is available AND originReason='OC' AND OptionalOrSuppFie IdsSeparatelyRepor ted ='N' AND entityType='NP' AND foreignPrivacyExce ption='N'	Suffx of the natural person reportable account owner		cftcBatch/cftcForm102/relate dEntity@nameSuffix

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
17.	Special Account Owner Street Address	Question 6	Conditional. Required if originReason='OC' AND OptionalOrSuppFie IdsSeparatelyRepor ted ='N' AND foreignPrivacyExce ption='N'	Street address of the reportable account owner		cftcBatch/cftcForm102/relate dEntity@street
18.	Special Account Owner Suite	Question 6	Conditional. Required if information available AND originReason = 'OC' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	Suite of the reportable account owner		cftcBatch/cftcForm102/relate dEntity@suite
19.	Special Account Owner City	Question 6	Conditional. Required if originReason='OC' AND OptionalOrSuppFie ldsSeparatelyRepor ted ='N' AND	City of the reportable account owner		cftcBatch/cftcForm102/relate dEntity@city

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			foreignPrivacyExce ption='N'			
20.	Special Account Owner State	Question 6	Conditional. Required if originReason='OC' AND OptionalOrSuppFie ldsSeparatelyRepor ted ='N' AND foreignPrivacyExce ption='N'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/relate dEntity@state
21.	Special Account Owner Country	Question 6	Conditional. Required if originReason='OC' AND OptionalOrSuppFie ldsSeparatelyRepor ted ='N'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/relate dEntity@country
22.	Special Account Owner Zip/Postal Code	Question 6	Conditional. Required if originReason='OC' AND OptionalOrSuppFie IdsSeparatelyRepor ted ='N' AND foreignPrivacyExce ption='N'	Zip/Postal code of the reportable account owner		cftcBatch/cftcForm102/relate dEntity@postalCode

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
23.	Special Account Owner Phone Number	Question 6	Conditional. Required if originReason='OC' AND OptionalOrSuppFie IdsSeparatelyRepor ted ='N' AND foreignPrivacyExce ption='N'	Phone Number of the reportable account owner		cftcBatch/cftcForm102/relate dEntity@telephone
24.	Special Account Owner Email Address	Question 6	Conditional. Required if originReason='OC' AND OptionalOrSuppFie IdsSeparatelyRepor ted ='N' AND foreignPrivacyExce ption='N'	Email address of the reportable account owner		cftcBatch/cftcForm102/relate dEntity@email
IF SP	ECIAL ACCOUNT	Γ OWNER IS A LEGA	ENTITY			
25.	Special Account Owner Contact Last Name	Question 6	Conditional. Required if originReason='OC' AND entityType='LE' AND OptionalOrSuppFie	Surname of the contact person for the owner		cftcBatch/cftcForm102/relate dEntity/contact@lastName

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			IdsSeparatelyRepor ted ='N' AND foreignPrivacyExce ption='N'			
26.	Special Account Owner Contact First Name	Question 6	Conditional. Required if originReason='OC' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted ='N' AND foreignPrivacyExce ption='N'	First name of the contact person for the owner		cftcBatch/cftcForm102/relate dEntity/contact@firstName
27.	Special Account Owner Contact Middle Name	Question 6	Conditional. Required if information is available AND originReason='OC' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepor ted ='N' AND foreignPrivacyExce ption='N'	Middle name of the contact person for the owner		cftcBatch/cftcForm102/relate dEntity/contact@middleName

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
28.	Special Account Owner Contact Name Suffix	Question 6	Conditional. Required if information is available AND originReason='OC' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepor ted ='N' AND foreignPrivacyExce ption='N'	Suffix of the contact person for the owner		cftcBatch/cftcForm102/relate dEntity/contact@nameSuffix
29.	Special Account Owner Contact Job Title	Question 6	Conditional. Required if originReason='OC' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted ='N' AND foreignPrivacyExce ption='N'	Job title of the contact person for the owner		cftcBatch/cftcForm102/relate dEntity/contact@titleOrPositi on
30.	Contact Relationship to Special	Question 6	Conditional. Required if originReason='OC'	Contact relationship to the owner		cftcBatch/cftcForm102/relate dEntity/contact@relationship

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Account Owner		AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepor ted ='N' AND foreignPrivacyExce ption='N'			
31.	Special Account Owner Contact Phone Number	Question 6	Conditional. Required if originReason='OC' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted ='N' AND foreignPrivacyExce ption='N'	Phone number of the contact person for the owner		cftcBatch/cftcForm102/relate dEntity/contact@telephone
32.	Special Account Owner Contact Email Address	Question 6	Conditional. Required if originReason='OC' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted ='N' AND	Email address of the contact person for the owner		cftcBatch/cftcForm102/relate dEntity/contact@email

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	Data Element	Form 102A Question Number	foreignPrivacyExce ption='N'	CFTC Description, Purpose or Instruction	Valid Values	XML
FOR		ITITIES AND NATUR				
33.	Special Account Owner Website	Question 6	Conditional. Required if information available AND originReason='OC' AND OptionalOrSuppFie IdsSeparatelyRepor ted ='N' AND foreignPrivacyExce ption='N'	URL of the owner's website		cftcBatch/cftcForm102/relate dEntity@website
34.	Special Account Owner NFA ID	Question 6	Conditional. Required if information available AND originReason='OC' AND OptionalOrSuppFie IdsSeparatelyRepor ted ='N' AND foreignPrivacyExce ption='N'	The identification number given to the ownership entity by the National Futures Association		cftcBatch/cftcForm102/relate dEntity@NFAIdentifier

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML			
35.	Special Account Owner Legal Entity Identifier (LEI)	Question 6	Conditional. Required if information available AND originReason='OC' AND OptionalOrSuppFie IdsSeparatelyRepor ted ='Y' AND foreignPrivacyExce ption='N'	The legal entity identifier (LEI) assigned to the ownership entity by the LEI issuer		cftcBatch/cftcForm102/relate dEntity@legalEntityIdentifier			
SPEC	SPECIAL ACCOUNT CONTROLLER(S) CONTACT INFORMATION ¹⁰								
36.	Special Account Controller Indicator	Question 7	Conditional. Required if originReason = 'OC' OR	Indicates reporting special account controller	Y = Yes N = No	cftcBatch/cftcForm102/relate dEntity@isController			

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¹⁰ Reporting parties should provide only one value in each field for question 7 on Form 102A, which asks for the special account controller contact information. Reporting parties should not report multiple controllers in response to question 7, because the OCR Final Rule requires 102 reporting on the basis of control of a reportable position. See part 150.4 of the Commission's regulations for rules regarding the aggregation of positions based on control. Parties aggregating on the basis of control should report only a single controller in response to question 7. See OCR Final Rule pp. 69183-4.

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			originReason = 'CC' then isController = 'Y'			
37.	Foreign Privacy Law Exception Indicator	Question 7	Conditional. Required if originReason='CC'	Identifies if reported special account controller data is covered by foreign privacy-protection laws	Y = Yes N = No	cftcBatch/cftcForm102/relate dEntity@foreignPrivacyExcepti on
38.	Special Account Controller Type Indicator	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC'	Indicates whether the special account Controller is a legal entity or natural person	LE = Legal Entity NP = Natural Person	cftcBatch/cftcForm102/relate dEntity@entityType
39.	Special Account Controller Optional Fields or Supplemental Fields Reported to LEI Provider	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC'	Indicates that one or more "Optional Fields" or "Supplemental Fields" not included in this question were reported to the CICI Utility (or other CFTC-approved LEI provider) and are associated with the	Y = Yes N = No	cftcBatch/cftcForm102/relate dEntity@OptionalOrSuppField sSeparatelyReported

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IF SP	Data Element ECIAL ACCOUNT	Form 102A Question Number	Required LEGAL ENTITY	CFTC Description, Purpose or Instruction LEI provided in this submission	Valid Values	XML
40.	Special Account Controller Legal Entity Name	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	Legal or registered name of the reportable account Controller		cftcBatch/cftcForm102/relate dEntity@legalEntityName
IF SP	ECIAL ACCOUNT	CONTROLLER IS A	NATURAL PERSON			
41.	Special Account Controller Natural Person Last Name	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType='NP'	Surname of the natural person reportable account Controller (if natural person)		cftcBatch/cftcForm102/relate dEntity@lastName

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'			
42.	Special Account Controller Natural Person First Name	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType='NP' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	Given or first in order name of the natural person reportable account Controller		cftcBatch/cftcForm102/relate dEntity@firstName
43.	Special Account Controller Natural Person Middle Name	Question 7	Conditional. Required if information available AND originReason = 'OC' OR originReason = 'CC' AND	Middle name of the natural person reportable account Controller		cftcBatch/cftcForm102/relate dEntity@middleName

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			entityType='NP' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'			
44.	Special Account Controller Natural Person Suffix	Question 7	Conditional. Required if information available AND originReason = 'OC' OR originReason = 'CC' AND entityType='NP' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	Suffix of the natural person reportable account Controller		cftcBatch/cftcForm102/relate dEntity@nameSuffix
FOR 1	BOTH LEGAL EN	ITITIES AND NATU	RAL PERSONS			
45.	Special Account Controller	Question 7	Conditional. Required if	Street address of the reportable account Controller		cftcBatch/cftcForm102/relate dEntity@street

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Street Address		originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'			
46.	Special Account Controller Suite	Question 7	Conditional. Required if information available AND originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	Suite of the reportable account Controller		cftcBatch/cftcForm102/relate dEntity@suite
47.	Special Account Controller City	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC'	City of the reportable account Controller		cftcBatch/cftcForm102/relate dEntity@city

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'			
48.	Special Account Controller State	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/relate dEntity@state
49.	Special Account Controller Country	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/relate dEntity@country

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
50.	Special Account Controller Zip/Postal Code	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	Zip/Postal code of the reportable account Controller		cftcBatch/cftcForm102/relate dEntity@postalCode
51.	Special Account Controller Phone Number	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	Phone Number of the reportable account Controller		cftcBatch/cftcForm102/relate dEntity@telephone
52.	Special Account Controller Email Address	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC'	Email address of the reportable account Controller		cftcBatch/cftcForm102/relate dEntity@email

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
IF SP	PECIAL ACCOUN	T CONTROLLER IS A	AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N' LEGAL ENTITY			
53.	Special Account Controller Contact Last Name	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	Surname of the natural person contact for the Controller		cftcBatch/cftcForm102/relate dEntity/contact@lastName
54.	Special Account Controller Contact First	Question 7	Conditional. Required if originReason = 'OC' OR	First name of the natural person contact for the Controller		cftcBatch/cftcForm102/relate dEntity/contact@firstName

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Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
Name		originReason = 'CC' AND entityType=' LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'			
Special Account Controller Contact Middle Name	Question 7	Conditional. Required if information is available AND originReason='OC' OR originReason = 'CC' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepor ted ='N' AND foreignPrivacyExce ption='N'	Middle name of the contact person for the Controller		cftcBatch/cftcForm102/relate dEntity/contact@middleName
Special Account Controller Contact Name	Question 7	Conditional. Required if information is available AND	Suffix of the contact person for the Controller		cftcBatch/cftcForm102/relate dEntity/contact@nameSuffix
Accoun Control	ler	t ler	ption='N' Question 7 Conditional. t Required if information is	ption='N' Question 7 Conditional. Required if contact person for information is available AND originReason='OC' ption='N' Suffix of the contact person for the Controller	ption='N' Question 7 Conditional. Required if contact person for information is available AND ption='N' Suffix of the contact person for the Controller

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			OR originReason = 'CC' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted ='N' AND foreignPrivacyExce ption='N'			
57.	Special Account Controller Contact Job Title	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType=' LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	Job title of the contact person for Controller entity		cftcBatch/cftcForm102/relate dEntity/contact@titleOrPositi on
58.	Contact Relationship to Special	Question 7	Conditional. Required if originReason =	Contact relationship to the controller		cftcBatch/cftcForm102/relate dEntity/contact@relationship

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Account Controller		'OC' OR originReason = 'CC' AND entityType=' LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'			
59.	Special Account Controller Contact Phone Number	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType=' LE' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	Phone number of the contact person for the Controller entity		cftcBatch/cftcForm102/relate dEntity/contact@telephone

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
60.	Special Account Controller Contact Email Address	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType=' LE' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	Email address of the contact person for the Controller entity		cftcBatch/cftcForm102/relate dEntity/contact@email
61.	Special Account Controller Website	Question 7	Conditional. Required if information available AND originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	URL of the Controller's website		cftcBatch/cftcForm102/relate dEntity@website

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
62.	Special Account Controller NFA ID	Question 7	Conditional. Required if information available AND originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND foreignPrivacyExce ption='N'	The identification number given to the Controller entity by the National Futures Association		cftcBatch/cftcForm102/relate dEntity@NFAIdentifier
63.	Special Account Controller Legal Entity Identifier (LEI)	Question 7	Conditional. Required if information available AND originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFie ldsSeparatelyRepor ted ='Y' AND foreignPrivacyExce ption='N'	The legal entity identifier (LEI) assigned to the Controller entity by the LEI issuer		cftcBatch/cftcForm102/relate dEntity@legalEntityIdentifier

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML			
OMN	OMNIBUS ACCOUNT ORIGINATOR CONTACT INFORMATION								
64.	Omnibus Account Originator Indicator	Question 8	Conditional. Required if originReason = 'OM' Then isOriginator='Y'	Indicates reporting special account orginiator	Y = Yes N = No	cftcBatch/cftcForm102/relate dEntity@isOriginator			
65.	Omnibus Account Originator Optional Fields or Supplemental Fields Reported to LEI Provider	Question 8	Conditional. Required if originReason='OM'	Indicates that one or more "Optional Fields" or "Supplemental Fields" not included in this question were reported to the CICI Utility (or other CFTC-approved LEI provider) and are associated with the LEI provided in this submission	Y = Yes N = No	cftcBatch/cftcForm102/relate dEntity@OptionalOrSuppField sSeparatelyReported			
66.	Foreign Privacy Law Exception Indicator	Question 8	Conditional. Required if originReason='OM'	Identifies if reported omnibus originator data is covered by foreign privacy-protection	Y = Yes N = No	cftcBatch/cftcForm102/relate dEntity@foreignPrivacyExcepti on			

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				laws		
67.	Omnibus Account Originator Entity Type	Question 8	Yes, entityType='LE'		LE = Legal Entity	cftcBatch/cftcForm102/relate dEntity@entityType
68.	Omnibus Account Originator Name	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND entityType='LE' AND foreignPrivacyExce ption='N'	Legal name of the reportable account Originator		cftcBatch/cftcForm102/relate dEntity@legalEntityName
69.	Omnibus Account Originator Street Address	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND foreignPrivacyExce ption='N'	Street address of the reportable account Originator		cftcBatch/cftcForm102/relate dEntity@street

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
70.	Omnibus Account Originator Suite	Question 8	Conditional. Required if information available AND originReason='OM' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND foreignPrivacyExce ption='N'	Suite of the reportable account Originator		cftcBatch/cftcForm102/relate dEntity@suite
71.	Omnibus Account Originator City	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND foreignPrivacyExce ption='N'	City of the reportable account Originator		cftcBatch/cftcForm102/relate dEntity@city
72.	Omnibus Account Originator State	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND foreignPrivacyExce	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/relate dEntity@state

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			ption='N'			
73.	Omnibus Account Originator Country	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/relate dEntity@country
74.	Omnibus Account Originator Zip/Postal Code	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND foreignPrivacyExce ption='N'	Zip/Postal code of the reportable account Originator		cftcBatch/cftcForm102/relate dEntity@postalCode
75.	Omnibus Account Originator Phone Number	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND foreignPrivacyExce ption='N'	Phone Number of the reportable account Originator		cftcBatch/cftcForm102/relate dEntity@telephone

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
76.	Omnibus Account Originator Contact Last Name	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND foreignPrivacyExce ption='N'	Surname of the natural person contact for the Originator		cftcBatch/cftcForm102/relate dEntity/contact@lastName
77.	Omnibus Account Originator Contact First Name	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND foreignPrivacyExce ption='N'	First name of the natural person contact for the Originator		cftcBatch/cftcForm102/relate dEntity/contact@firstName
78.	Omnibus Account Originator Contact Middle Name	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND foreignPrivacyExce ption='N'	Middle name of the natural person contact for the Originator		cftcBatch/cftcForm102/relate dEntity/contact@middleName

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
79.	Omnibus Account Originator Contact Suffix	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND foreignPrivacyExce ption='N'	Suffix of the natural person contact for the Originator		cftcBatch/cftcForm102/relate dEntity/contact@nameSuffix
80.	Omnibus Account Originator Contact Job Title	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND foreignPrivacyExce ption='N'	Job title of the contact person at or related to the Originator entity		cftcBatch/cftcForm102/relate dEntity/contact@titleOrPositi on
81.	Contact Relationship to Omnibus Account Originator	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND foreignPrivacyExce ption='N'	Contact relationship to the Originator entity		cftcBatch/cftcForm102/relate dEntity/contact@relationship

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
82.	Omnibus Account Originator Contact Phone Number	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND foreignPrivacyExce ption='N'	Phone number of the contact person for the Originator entity		cftcBatch/cftcForm102/relate dEntity/contact@telephone
83.	Omnibus Account Originator Contact Email Address	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND foreignPrivacyExce ption='N'	Email address of the contact person for the Originator entity		cftcBatch/cftcForm102/relate dEntity/contact@email
84.	Omnibus Account Originator Website	Question 8	Conditional. Required if information available AND originReason='OM' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND foreignPrivacyExce	URL of the Originator's website		cftcBatch/cftcForm102/relate dEntity@website

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			ption='N'			
85.	Special Account Originator NFA ID	Question 8	Conditional. Required if information available AND originReason='OM' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	The identification number given to the Originator entity by the National Futures Association		cftcBatch/cftcForm102/relate dEntity@NFAIdentifier
86.	Omnibus Account Originator Legal Entity Identifier (LEI)	Question 8	Conditional. Required if information available AND originReason='OM' AND OptionalOrSuppFie IdsSeparatelyRepor ted ='Y' AND foreignPrivacyExce ption='N'	The legal entity identifier (LEI) assigned to the Originator entity by the LEI issuer		cftcBatch/cftcForm102/relate dEntity@legalEntityIdentifier

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IDEN	Data Element	Form 102A Question Number	Required INT(S) THAT COMPRIS	CFTC Description, Purpose or Instruction	Valid Values	XML
IDLI		TIMDING ACCOU	WI(5) TIMIT COMI KIS	L THE ST LCM ME	00111	
87.	Special Account Trading Account Indicator	Question 9	Yes, isTradingAccount=' Y'		Y = Yes N = No	cftcBatch/cftcForm102/relate dAccount@isTradingAccount
88.	Special Account Trading Account Number	Question 9	Conditional. Required if isTradingAccount=' Y'	For each special account reported by an entity acting as a clearing member, provide the trading account number		cftcBatch/cftcForm102/relate dAccount@accountNumber
89.	Short Code	Question 9	Conditional. Required if isTradingAccount=' Y'	For each special account reported by an entity acting as a clearing member, provide the related short		cftcBatch/cftcForm102/relate dAccount/relatedAcctInfo@ac countShortCode

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¹¹ Page 69184 of the OCR final rule contains a discussion of how to identify the trading account numbers that comprise a special account and, by extension, identify the reporting market at which each trading account number appears. This discussion states that, "Trading accounts that comprise a position-based special account include all of those trading accounts that: (1) are used to execute trades cleared by the clearing member submitting the 102A; (2) are owned or controlled by the entity identified as owning or controlling the special account reported on a 102A; and (3) execute transactions in the same commodity or commodities in which the special account has a reportable position."

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				code		
90.	Reporting Market ¹²	Question 9	Conditional. Required if isTradingAccount=' Y'	Identify the reporting market at which each trading account number appears	ISO Market Identifier Code (MIC) located at: http://www.iso1502 2.org/MIC/homepag eMIC.htm ¹³	cftcBatch/cftcForm102/relate dAccount/relatedAcctInfo @marketIdentifier
TRAI	DING ACCOUNT	OWNERSHIP AND CO	ONTROL INFORMAT	TION		
OMN	IBUS ACCOUNT	INFORMATION				
91.	Trading	Question 10i	Conditional.	For each trading	Y = Yes	cftcBatch/cftcForm102/relate
	Account		Required if	account identified	N = No	dAccount@isOmnibus
	Omnibus Account		isTradingAccount=' Y'	in question 9, is such account an		
	Indicator			omnibus account		

¹² See preceding footnote.

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¹³ See the CFTC website at http://www.cftc.gov/IndustryOversight/TradingOrganizations/index.htm for a list of trading organizations regulated by the CFTC.

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
92.	House or Customer Indicator	Question 10i	Conditional. Required if isTradingAccount=' Y' AND isOmnibus ='Y'	If the reportable Trading Account is being reported as an Omnibus Account indicate whether the Trading Account Omnibus Account is a house or customer account of the reporting firm	H = House C = Customer	cftcBatch/cftcForm102/relate dAccount@accountClass
93.	Trading Account Omnibus Account Originator Indicator	Question 10i	Conditional, if isTradingAccount=' Y' AND isOmnibus ='Y' THEN isOriginator = 'Y'	Indicates reportable Trading Account Omnibus Account orginiator	Y = Yes N = No	cftcBatch/cftcForm102/relate dAccount/relatedEntity@isOri ginator
94.	Foreign Privacy Law Exception Indicator	Question 10i	Conditional. Required if isOriginator='Y'	Identifies if reported omnibus originator data is covered by foreign privacy-protection laws	Y = Yes N = No	cftcBatch/cftcForm102/relate dAccount/relatedEntity@forei gnPrivacyException
95.	Trading Account Omnibus	Question 10i	Conditional, if isTradingAccount=' Y'	Indicates that one or more "Optional	Y = Yes N = No	cftcBatch/cftcForm102/relate dAccount/relatedEntity@ OptionalOrSuppFieldsSeparate

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Account Optional Fields or Supplemental Fields Reported to LEI Provider		AND isOmnibus ='Υ'	Fields" or "Supplemental Fields" not included in this question were reported to the CICI Utility (or other CFTC- approved LEI provider) and are associated with the LEI provided in this submission		lyReported
96.	Trading Account Omnibus Account Entity Type	Question 10i	Yes, entityType = 'LE'		LE=Legal Entity	cftcBatch/cftcForm102/relate dAccount/relatedEntity@entit yType
97.	Trading Account Omnibus Account Originator Name	Question 10i	Conditional. Required if isTradingAccount=' Y' AND isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepor	Name of omnibus trading account originator		cftcBatch/cftcForm102/relate dAccount/relatedEntity@legal EntityName

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			ted = 'N' AND foreignPrivacyExce ption='N'			
98.	Trading Account Omnibus Account Originator Street Address	Question 10i	Conditional. Required if isTradingAccount=' Y' AND isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	Street address of omnibus trading account Originator		cftcBatch/cftcForm102/relate dAccount/relatedEntity@stree t
99.	Trading Account Omnibus Account Originator Suite	Question 10i	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce	Suite of omnibus trading account Originator		cftcBatch/cftcForm102/relate dAccount/relatedEntity@suite

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			ption='N'			
100.	Trading Account Omnibus Account Originator City	Question 10i	Conditional. Required if isTradingAccount=' Y' AND isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	City of the omnibus trading account Originator		cftcBatch/cftcForm102/relate dAccount/relatedEntity@city
101.	Trading Account Omnibus Account Originator State	Question 10i	Conditional. Required if isTradingAccount=' Y' AND isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/relate dAccount/relatedEntity@state

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
102.	Trading Account Omnibus Account Originator Country	Question 10i	Conditional. Required if isTradingAccount=' Y' AND isOmnibus ='Y' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/relate dAccount/relatedEntity@coun try
103.	Trading Account Omnibus Account Originator Zip/Postal Code	Question 10i	Conditional. Required if isTradingAccount=' Y' AND isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	Zip/Postal code of the omnibus trading account Originator		cftcBatch/cftcForm102/relate dAccount/relatedEntity@post alCode
104.	Trading Account Omnibus Account Originator Phone	Question 10i	Conditional. Required if isTradingAccount=' Y' AND isOmnibus ='Y' AND	Phone Number of the omnibus trading account Originator		cftcBatch/cftcForm102/relate dAccount/relatedEntity@telep hone

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Number		OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'			
105.	Trading Account Omnibus Account Originator Contact Last Name	Question 10i	Conditional. Required if isTradingAccount=' Y' AND isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	Surname of the contact for the Originator		cftcBatch/cftcForm102/relate dAccount/relatedEntity/conta ct@lastName
106.	Trading Account Omnibus Account Originator Contact First Name	Question 10i	Conditional. Required if isTradingAccount=' Y' AND isOmnibus ='Y' AND entityType='LE' AND	First name of the contact for the Originator		cftcBatch/cftcForm102/relate dAccount/relatedEntity/conta ct@firstName

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'			
107.	Trading Account Omnibus Account Contact Middle Name	Question 10i	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	Middle name of the contact for the Originator		cftcBatch/cftcForm102/relate dAccount/relatedEntity/conta ct@middleName
108.	Trading Account Omnibus Account Contact Suffix	Question 10i	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus	Suffix of the contact for the Originator		cftcBatch/cftcForm102/relate dAccount/relatedEntity/conta ct@nameSuffix

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'			
109.	Trading Account Omnibus Account Originator Contact Job Title	Question 10i	Conditional. Required if isTradingAccount=' Y' AND isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	Job title of the contact person for Originator entity		cftcBatch/cftcForm102/relate dAccount/relatedEntity/conta ct@titleOrPosition
110.	Contact Relationship to Trading Account Omnibus	Question 10i	Conditional. Required if isTradingAccount=' Y' AND isOmnibus	Contact relationship to the Originator entity		cftcBatch/cftcForm102/relate dAccount/relatedEntity/conta ct@relationship

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Account Originator		='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'			
111.	Trading Account Omnibus Account Originator Contact Phone Number	Question 10i	Conditional. Required if isTradingAccount=' Y' AND isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	Phone number of the contact person for the Originator entity		cftcBatch/cftcForm102/relate dAccount/relatedEntity/conta ct@telephone
112.	Trading Account Omnibus Account Originator	Question 10i	Conditional. Required if isTradingAccount=' Y' AND isOmnibus	Email address of the contact person for the Originator entity		cftcBatch/cftcForm102/relate dAccount/relatedEntity/conta ct@email

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Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
Contact Email Address		='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'			
Trading Account Omnibus Account Originator Website	Question 10i	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N' AND foreignPrivacyExce ption='N'	URL of the Originator's website		cftcBatch/cftcForm102/relate dAccount/relatedEntity@webs ite
Trading Account	Question 10i	Conditional. Required if	The identification number given to		cftcBatch/cftcForm102/relate dAccount/relatedEntity@NFAI dentifier
	Contact Email Address Trading Account Omnibus Account Originator Website	Contact Email Address Trading Account Omnibus Account Originator Website Trading Question 10i Account Originator Website	Number Contact Email Address	Number Sumber Purpose or Instruction	Contact Email Address AND

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	Element	Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Account Originator NFA ID		available AND isTradingAccount=' Y' AND isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND foreignPrivacyExce ption='N'	entity by the National Futures Association		
115.	Trading Account Omnibus Account Originator Legal Entity Identifier (LEI)	Question 10i	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepor ted ='Y' AND foreignPrivacyExce ption='N'	The legal entity identifier (LEI) assigned to the Originator entity by the LEI issuer		cftcBatch/cftcForm102/relate dAccount/relatedEntity@legal EntityIdentifier

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
116.	Trading Account Owner Indicator	Question 10ii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' THEN isOwner='Y'	Indicates reporting trading account owner	Y = Yes N = No	cftcBatch/cftcForm102/ relatedAccount/relatedEntity @isOwner
117.	Foreign Privacy Law Exception Indicator	Question 10ii	Conditional. Required if isOwner='Y'	Identifies if reported trading account owner data is covered by foreign privacy-protection laws	Y = Yes N = No	cftcBatch/cftcForm102/relate dAccount/relatedEntity@forei gnPrivacyException
118.	Trading Account Owner Type Indicator	Question 10ii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y'	Indicates whether the trading account owner is a legal entity or natural person	LE = Legal Entity NP = Natural Person	cftcBatch/cftcForm102/ relatedAccount/relatedEntity @entityType
119.	Trading Account Owner Optional Fields or Supplemental Fields Reported to	Question 10ii	Conditional, if isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y'	Indicates that one or more "Optional Fields" or "Supplemental Fields" not included in this question were reported to the	Y = Yes N = No	cftcBatch/cftcForm102/ relatedAccount/relatedEntity @OptionalOrSuppFieldsSepara telyReported

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	LEI Provider			CICI Utility (or other CFTC- approved LEI provider) and are associated with the LEI provided in this submission		
IF TR	ADING ACCOU	NT OWNER IS A LEGA	AL ENTITY			
120.	Trading Account Owner Legal Entity Name	Question 10ii	Conditional. Required if isTradingAccount=' Y' AND	Legal or registered name of the trading account owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @legalEntityName

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
121.	Trading Account Owner Natural Person Last Name	Question 10ii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND foreignPrivacyExce ption='N'	Surname of the natural person trading account owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @lastName
122.	Trading Account Owner Natural Person First Name	Question 10ii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND	Given or first in order name of the natural person trading account owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @firstName

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			foreignPrivacyExce ption='N'			
123.	Trading Account Owner Middle Name	Question 10ii	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND foreignPrivacyExce ption='N'	Middle name of the natural person trading account owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @middleName
124.	Trading Account Owner Suffix	Question 10ii	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y'	Suffix of the natural person trading account owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @nameSuffix

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
FOR	BOTH LEGAL EN	NTITIES AND NATUR	AND entityType='NP' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND foreignPrivacyExce ption='N' AAL PERSONS			
125.	Trading Account Owner Street Address	Question 10ii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	Street address of the trading account owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @street

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
126.	Trading Account Owner Suite	Question 10ii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	Suite of the trading account owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @suite
127.	Trading Account Owner City	Question 10ii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND FollowOnInformati	City of the trading account owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @city

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			onToCome='N' AND foreignPrivacyExce ption='N'			
128.	Trading Account Owner State	Question 10ii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		relatedAccount/relatedEntity @state
129.	Trading Account Owner Country	Question 10ii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @country

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N'			
130.	Trading Account Owner Zip/Postal Code	Question 10ii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	Zip/Postal code of the trading account owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @postalCode
131.	Trading Account Owner Phone Number	Question 10ii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y'	Phone Number of the trading account owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @telephone

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
IF TR	ADING ACCOU	NT OWNER IS A NA	AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N' TURAL PERSON			
132.	Trading Account Owner Email Address	Question 10ii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce	Email address of the trading account owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @email

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			ption='N'			
IF TR	ADING ACCOUN	T OWNER IS A LEGA	AL ENTITY			
133.	Trading Account Owner Contact Last Name	Question 10ii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	Surname of the natural person contact for the owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity/ contact@lastName
134.	Trading Account Owner Contact First Name	Question 10ii	Conditional. Required if isTradingAccount=' Y' AND	First name of the natural person contact for the owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity/ contact@firstName

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'			
135.	Trading Account Owner Contact Middle Name	Question 10ii	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND	Middle name of the natural person contact for the owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity/ contact@middleName

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'			
136.	Trading Account Owner Contact Suffix	Question 10ii	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	Suffix of the natural person contact for the owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity/ contact@nameSuffix
137.	Trading Account Owner	Question 10ii	Conditional. Required if isTradingAccount='	Job title of the contact person for the ownership		cftcBatch/cftcForm102/ relatedAccount/relatedEntity/ contact@titleOrPosition

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Contact Job Title		Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	entity		
138.	Contact Relationship to Trading Account Owner	Question 10ii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND	Contact relationship to the trading account owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity/ contact@relationship

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'			
139.	Trading Account Owner Contact Phone Number	Question 10ii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	Phone number of the contact person for the ownership entity		cftcBatch/cftcForm102/ relatedAccount/relatedEntity/ contact@telephone
140.	Trading Account Owner Contact Email Address	Question 10ii	Conditional. Required if isTradingAccount=' Y' AND	Email address of the contact person for the ownership entity		cftcBatch/cftcForm102/ relatedAccount/relatedEntity/ contact@email

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'			
141.	Trading Account Owner Website	Question 10ii	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N' AND	URL of the owner's website		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @website

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			foreignPrivacyExce ption='N'			
142.	Trading Account Owner NFA ID	Question 10ii	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	The identification number given to the ownership entity by the National Futures Association		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @NFAIdentifier
143.	Trading Account Owner Legal Entity Identifier (LEI)	Question 10ii	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND	The legal entity identifier (LEI) assigned to the ownership entity by the LEI issuer		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @legalEntityIdentifier

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			OptionalOrSuppFie IdsSeparatelyRepor ted ='Y' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'			
TRAD	DING ACCOUNT	CONTROLLER(S)				
144.	Trading Account Controller Indicator	Question 10iii	Conditional, if isTradingAccount=' Y' AND isOmnibus='N' THEN isController='Y'	Indicates reporting trading account Controller	Y = Yes N = No	cftcBatch/cftcForm102/ relatedAccount/relatedEntity @isController
145.	Foreign Privacy Law Exception Indicator	Question 10iii	Conditional. Required if isController='Y'	Identifies if reported trading account controller data is covered by foreign privacy-protection laws	Y = Yes N = No	cftcBatch/cftcForm102/relate dAccount/relatedEntity@forei gnPrivacyException
146.	Trading Account Controller Entity Type	Question 10iii	Conditional, if isTradingAccount=' Y' AND isOmnibus='N' AND		NP = Natural Person	cftcBatch/cftcForm102/ relatedAccount/relatedEntity @entityType

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			isController='Y' THEN entityType='NP'			
147.	Trading Account Controller Client Reporting Issue Indicator	Question 10iii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isController='Y'		0 = All trading account controller information is availiable and reported on form 1 = Client did not provide 2 = Data supplied by client does not appear to meet the CFTC definition of trading account controller	cftcBatch/cftcForm102/ relatedAccount/relatedEntity @clientReportingIssue
148.	Trading Account Controller Natural Person Last Name	Question 10iii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isController='Y' AND clientReportingIssu e='0' AND foreignPrivacyExce	Surname of the natural person trading account Controller		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @lastName

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			ption='N'			
149.	Trading Account Controller Natural Person First Name	Question 10iii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isController='Y' AND clientReportingIssu e='0' AND foreignPrivacyExce ption='N'	Given or first in order name of the natural person trading account Controller		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @firstName
150.	Trading Account Controller Natural Person Middle Name	Question 10iii	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus='N' AND isController='Y' AND clientReportingIssu e='0' AND foreignPrivacyExce ption='N'	Middle name of the natural person trading account Controller		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @middleName

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
151.	Trading Account Controller Natural Person Suffix	Question 10iii	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus='N' AND isController='Y' AND clientReportingIssu e='0' AND foreignPrivacyExce ption='N'	Suffix of the natural person trading account Controller		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @nameSuffix
152.	Trading Account Controller Street Address	Question 10iii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND clientReportingIssu e='0' AND	Street address of the trading account Controller		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @street

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			foreignPrivacyExce ption='N'			
153.	Trading Account Controller Suite	Question 10iii	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND clientReportingIssu e='0' AND foreignPrivacyExce ption='N'	Suite of the trading account Controller		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @suite
154.	Trading Account Controller City	Question 10iii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isController='Y'	City of the trading account Controller		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @city

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND FollowOnInformati onToCome='N' AND clientReportingIssu e='0' AND foreignPrivacyExce ption='N'			
155.	Trading Account Controller State	Question 10iii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND clientReportingIssu e='0' AND foreignPrivacyExce ption='N'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @state
156.	Trading Account Controller Country	Question 10iii	Conditional. Required if isTradingAccount=' Y'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @country

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND clientReportingIssu e='0'			
157.	Trading Account Controller Zip/Postal Code	Question 10iii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND clientReportingIssu e='0' AND foreignPrivacyExce ption='N'	Zip/Postal code of the trading account Controller		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @postalCode
158.	Trading Account	Question 10iii	Conditional. Required if	Phone Number of the trading		cftcBatch/cftcForm102/ relatedAccount/relatedEntity

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Controller Phone Number		information available AND isTradingAccount=' Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	account Controller		@telephone
159.	Trading Account Controller Name of Employer	Question 10iii	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND			cftcBatch/cftcForm102/ relatedAccount/relatedEntity @employerName

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			foreignPrivacyExce ption='N'			
160.	Trading Account Controller Employer NFA ID	Question 10iii	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'			cftcBatch/cftcForm102/ relatedAccount/relatedEntity @employerNFAIdentifier
161.	Trading Account Controller Employer Legal Entity Identifier	Question 10iii	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus='N' AND isController='Y'			cftcBatch/cftcForm102/ relatedAccount/relatedEntity @employerLEI

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'			
162.	Trading Account Controller Job Title	Question 10iii	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	Job title of the contact person for the Controller entity		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @titleOrPosition
163.	Relationship to Trading Account Owner	Question 10iii	Conditional. Required if information available AND isTradingAccount=' Y'	Relationship to the trading account owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @relationship

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'			
164.	Trading Account Controller Email Address	Question 10iii	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	Email address of the trading account Controller		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @email
165.	Trading Account	Question 10iii	Conditional. Required if	The identification number given to		cftcBatch/cftcForm102/ relatedAccount/relatedEntity

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Controller NFA ID		information available AND isTradingAccount=' Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	the Controller entity by the National Futures Association		@NFAIdentifier
FOR I	REPORTING FIR	MS THAT ARE FORE	EIGN BROKERS			
166.	U.S. Futures Commission Merchant Indicator	Question 11	Conditional, if cftcForm102@isFB = 'Y' THEN relatedEntity@isFC M = 'Y'	Indicates U.S. futures commission merchant when reporting firm indicated as	Y = Yes N = No	cftcBatch/cftcForm102/relate dEntity@isFCM ¹⁴

¹⁴ Foreign broker reporting parties may report multiple U.S. futures commission merchants in response to question 11 on the Form 102A. To do so, reporting parties must provide an additional relatedEntity element for each reported U.S. FCM. Each element should contain isFCM = 'Y' and all fields should be completed with respect to each reported U.S. FCM.

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				foreign broker		
167.	U.S. Futures Commission Merchant Entity Type	Question 11	Conditional, if isFCM = 'Y' THEN entityType = 'LE'		LE = Legal Entity	cftcBatch/cftcForm102/relate dEntity@entityType
168.	U.S. Futures Commission Merchant Legal Entity Name	Question 11	Conditional, if isFCM = 'Y'	Legal Entity Name of the U.S. Futures Commission Merchant		cftcBatch/cftcForm102/relate dEntity@legalEntityName
169.	U.S. Futures Commission Merchant Street Address	Question 11	Conditional, if isFCM = 'Y'	Street address of the reportable account U.S. Futures Commission Merchant		cftcBatch/cftcForm102/relate dEntity@street
170.	U.S. Futures Commission Merchant Suite	Question 11	Conditional. Required if information available AND isFCM = 'Y'	Suite of the reportable account U.S. Futures Commission Merchant		cftcBatch/cftcForm102/relate dEntity@suite
171.	U.S. Futures Commission Merchant City	Question 11	Conditional, if isFCM = 'Y'	City of the reportable account U.S. Futures Commission Merchant		cftcBatch/cftcForm102/relate dEntity@city

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
172.	U.S. Futures Commission Merchant State	Question 11	Conditional, if isFCM = 'Y'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/relate dEntity@state
173.	U.S. Futures Commission Merchant Country	Question 11	Conditional, if isFCM = 'Y'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/relate dEntity@country
174.	U.S. Futures Commission Merchant Zip/Postal Code	Question 11	Conditional, if isFCM = 'Y'	Zip/Postal code of the reportable account U.S. Futures Commission Merchant		cftcBatch/cftcForm102/relate dEntity@postalCode
175.	U.S. Futures Commission Merchant Contact Last Name	Question 11	Conditional, if isFCM = 'Y'	Surname of the natural person contact for the U.S. Futures Commission Merchant		cftcBatch/cftcForm102/relate dEntity/contact@lastName
176.	U.S. Futures Commission Merchant Contact First Name	Question 11	Conditional, if isFCM = 'Y'	First name of the natural person contact for the U.S. Futures Commission Merchant		cftcBatch/cftcForm102/relate dEntity/contact@firstName

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
177.	U.S. Futures Commission Merchant Contact Middle Name	Question 11	Conditional. Required if information available AND isFCM = 'Y'	Middle name of the natural person contact for the U.S. Futures Commission Merchant		cftcBatch/cftcForm102/relate dEntity/contact@middleName
178.	U.S. Futures Commission Merchant Contact Suffix	Question 11	Conditional. Required if information available AND isFCM = 'Y'	Suffix of the natural person contact for the U.S. Futures Commission Merchant		cftcBatch/cftcForm102/relate dEntity/contact@nameSuffix
179.	U.S. Futures Commission Merchant Contact Job Title	Question 11	Conditional, if isFCM = 'Y'	Job title of the contact person at or related to the U.S. Futures Commission Merchant entity		cftcBatch/cftcForm102/relate dEntity/contact@titleOrPositi on
180.	U.S. Futures Commission Merchant Contact Phone Number	Question 11	Conditional, if isFCM = 'Y'	Phone number of the contact person at or related to the U.S. Futures Commission Merchant entity		cftcBatch/cftcForm102/relate dEntity/contact@telephone
181.	U.S. Futures Commission Merchant Contact Email	Question 11	Conditional, if isFCM = 'Y'	Email address of the contact person at or related to the U.S. Futures		cftcBatch/cftcForm102/relate dEntity/contact@email

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Address			Commission Merchant entity		
182.	Reporting Firm Authorization Indicator	Signature/Authenti cation	Yes	Indicates if the submitter is duly authorized by the reporting firm to provide the information and representations submitted on this Form 102, and that information and representations are true and correct	Y = authorized N = not authorized	cftcBatch/cftcForm102/contac t@isAuthorizedRepresentative
183.	Authorized Representativ e Last Name	Signature/Authenti cation	Yes	Surname of the authorized representative		cftcBatch/cftcForm102/contac t@lastName
184.	Authorized Representativ e First Name	Signature/Authenti cation	Yes	Given or first in order name of the authorized representative		cftcBatch/cftcForm102/contac t@firstName
185.	Authorized Representativ e Middle Name	Signature/Authenti cation	Yes	Middle name of the authorized representative		cftcBatch/cftcForm102/contac t@middleName

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	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
186.	Authorized Representativ e Name Suffix	Signature/Authenti cation	Yes	Generation or name suffix of the authorized representative		cftcBatch/cftcForm102/contac t@nameSuffix
187.	Authorized Representativ e Position	Signature/Authenti cation	Yes	Job position of the authorized representative		cftcBatch/cftcForm102/contact@titleOrPosition
188.	Authorized Representativ e Submitted on behalf of	Signature/Authenti cation	Yes	Reporting Firm Name 102 was submitted on behalf of		cftcBatch/cftcForm102@onBe halfOf
189.	Date of Submission	Signature/Authenti cation	Yes	Date [indicated by the authorized representative] that the form was submitted to CFTC		cftcBatch/cftcForm102@subm itDate

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Data Dictionary for Form 102B – Identifying and reporting a volume threshold account ¹⁵

Note with regard to give-up reporting and as-of reporting on Form 102B:¹⁶

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
1.	New/Modified Indicator	Question 1	Yes	Indicates whether the volume threshold account (102B) is: • Resubmitted or	N = New M = Modified	cftcBatch/cftcForm102@infor mationType

Visit this link to view a pdf copy of the OCR Final Rule: http://www.cftc.gov/ucm/groups/public/@lrfederalregister/documents/file/2013-26789a.pdf

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¹⁵ When reviewing the data elements in this Technical Document, reporting parties should also review and consult the OCR Final Rule, including the requirements of the reporting forms attached as an appendix thereto. The reporting forms are the basis for these data elements. Reporting parties should visit this link to view the OCR Final Rule on the Federal Register: https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71

¹⁶ When reporting via Form 102B, reporting parties that receive give-up trades or as-of trades on a delayed basis may account for those trades as of the date the trade was originally executed, or as of the date on which the trade is actually received by the reporting party.

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				modified Informatio n for a previously reported volume threshold account • Re- submitted or modified Informatio n for a previously reported volume threshold account		
2.	Volume Threshold Trading Account Number	Question 2	Yes	For each Volume Threshold reported by an entity, provide the trading account number		cftcBatch/cftcForm102@accou ntNumber

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
3.	Short Code	Question 2	Conditional. Required if accountCategory=' VT'	For the Volume Threshold account reported by an entity, provide the related short code		cftcBatch/cftcForm102/related AcctInfo@accountShortCode
4.	Reporting Market	Question 2	Conditional. Required if accountCategory=' VT'	Identify the reporting market at which each trading account number appears ¹⁷	ISO Market Identifier Code (MIC) located at: http://www.iso1502 2.org/MIC/homepag eMIC.htm ¹⁸	cftcBatch/cftcForm102/related AcctInfo@marketIdentifier
5.	Associated Special Account Indicator	Question 3	No	If the volume threshold account has been previously identified as a trading account that comprises a	Y = Yes N = No	cftcBatch/cftcForm102/related Account@isSpecialAccount

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¹⁷ If a trading account number appears at multiple reporting markets, then reporting parties may report multiple reporting markets in response to question 2 on the Form 102B. In this case, parties should report a short code for the trading account in connection with each such reporting market.

¹⁸ See the CFTC website at http://www.cftc.gov/IndustryOversight/TradingOrganizations/index.htm for a list of trading organizations regulated by the CFTC.

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction special account(s) reported by a clearing member	Valid Values	XML
				in question 9 in section 102A		
6.	Associated Special Account Number	Question 3	No	If the volume threshold account has been previously identified as a trading account that comprises a special account(s) reported by a clearing member in question 9 in section 102A		cftcBatch/cftcForm102/related Account@accountNumber
VOLU	ME THRESHOL	D ACCOUNT OWNER	SHIP AND CONTRO	L INFORMATION		
OMN	IBUS ACCOUNT	INFORMATION				
7.	Volume Threshold Account Omnibus Account Indicator	Question 4	Conditional. Required if accountCategory=' VT'	Is the Volume Threshold Account an omnibus account, or used to execute trades for an omnibus	Y = Yes N = No	cftcBatch/cftcForm102@isOm nibus

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				account		
8.	House or Customer Indicator	Question 4	Conditional. Required if accountCategory=' VT' AND isOmnibus ='Y'	If the reported Volume Threshold Account is being reported as an Omnibus Account indicate whether the Volume Threshold Account Omnibus Account is a house or customer account of the reporting firm	H = House C = Customer	cftcBatch/cftcForm102@accou ntClass
9.	Volume Threshold Account Omnibus Account Originator Indicator	Question 4	Conditional. Required if accountCategory=' VT' AND isOmnibus ='Y' THEN isOriginator = 'Y'	Indicates reporting Volume Threshold Account Omnibus Account originator	Y = Yes N = No	cftcBatch/cftcForm102/related Entity@isOriginator
10.	Foreign Privacy Law Exception Indicator	Question 4	Conditional. Required if isOriginator='Y'	Identifies if reported omnibus originator data is covered by foreign	Y = Yes N = No	cftcBatch/cftcForm102/related Entity@foreignPrivacyExceptio n

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				privacy-protection laws		
11.	Volume Threshold Account Omnibus Account Optional Fields or Supplemental Fields Reported to LEI Provider	Question 4	Conditional. Required if accountCategory=' VT' AND isOmnibus ='Y'	Indicates that one or more "Optional Fields" or "Supplemental Fields" not included in this question were reported to the CICI Utility (or other CFTC-approved LEI provider) and are associated with the LEI provided in this submission	Y = Yes N = No	cftcBatch/cftcForm102/related Entity@OptionalOrSuppFieldsS eparatelyReported
12.	Volume Threshold Account Omnibus Account Entity Type	Question 4	Yes, entityType='LE'		LE=Legal Entity	cftcBatch/cftcForm102/related Entity@entityType
13.	Volume Threshold Account Omnibus	Question 4	Conditional. Required if accountCategory=' VT'	Legal or registered name of the reportable account Originator		cftcBatch/cftcForm102/related Entity@legalEntityName

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Account Originator Name		AND isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption='N'			
14.	Volume Threshold Account Omnibus Account Originator Street Address	Question 4	Conditional. Required if accountCategory=' VT' AND isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption='N'	Street address of the reportable account Originator		cftcBatch/cftcForm102/related Entity@street
15.	Volume Threshold Account Omnibus Account Originator Suite	Question 4	Conditional. Required if information available AND accountCategory=' VT' AND isOmnibus ='Y'	Suite of the reportable account Originator		cftcBatch/cftcForm102/related Entity@suite

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption='N'			
16.	Volume Threshold Account Omnibus Account Originator City	Question 4	Conditional. Required if accountCategory=' VT' AND isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption='N'	City of the reportable account Originator		cftcBatch/cftcForm102/related Entity@city
17.	Volume Threshold Account Omnibus Account Originator State	Question 4	Conditional. Required if accountCategory=' VT' AND isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/related Entity@state

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			foreignPrivacyExce ption='N'			
18.	Volume Threshold Account Omnibus Account Originator Country	Question 4	Conditional. Required if accountCategory=' VT' AND isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/related Entity@country
19.	Volume Threshold Account Omnibus Account Originator Zip/Postal Code	Question 4	Conditional. Required if accountCategory=' VT' AND isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption='N'	Zip/Postal code of the reportable account Originator		cftcBatch/cftcForm102/related Entity@postalCode
20.	Volume Threshold Account	Question 4	Conditional. Required if accountCategory='	Phone Number of the reportable account Originator		cftcBatch/cftcForm102/related Entity@telephone

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Omnibus Account Originator Phone Number		VT' AND isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption='N'			
21.	Volume Threshold Account Omnibus Account Originator Contact Last Name	Question 4	Conditional. Required if accountCategory=' VT' AND isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption='N'	Surname of the natural person contact for the Originator		cftcBatch/cftcForm102/related Entity/contact@lastName
22.	Volume Threshold Account Omnibus Account Originator	Question 4	Conditional. Required if accountCategory=' VT' AND isOmnibus ='Y'	First name of the natural person contact for the Originator		cftcBatch/cftcForm102/related Entity/contact@firstName

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Contact First Name		AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption='N'			
23.	Volume Threshold Account Omnibus Account Contact Middle Name	Question 4	Conditional. Required if information available AND accountCategory=' VT' AND isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption='N'	Middle name of the natural person contact for the Originator		cftcBatch/cftcForm102/related Entity/contact@middleName
24.	Volume Threshold Account Omnibus	Question 4	Conditional. Required if information available AND	Suffix of the natural person contact for the Originator		cftcBatch/cftcForm102/related Entity/contact@nameSuffix

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
25.	Volume Threshold Account Omnibus Account Originator Contact Job Title	Question 4	accountCategory=' VT' AND isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption='N' Conditional. Required if accountCategory=' VT' AND isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie	Job title of the contact person for the Originator entity		cftcBatch/cftcForm102/related Entity/contact@titleOrPosition
			IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption='N'			
26.	Contact Relationship	Question 4	Conditional. Required if	Contact relationship to the		cftcBatch/cftcForm102/related Entity/contact@relationship

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
27.	to Volume Threshold Account Omnibus Account Originator	Question 4	accountCategory=' VT' AND isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption='N' Conditional.	Originator entity Phone number of		cftcBatch/cftcForm102/related
21.	Threshold Account Omnibus Account Originator Contact Phone Number	Question 4	Required if accountCategory=' VT' AND isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption='N'	the contact person for the Originator entity		Entity/contact@telephone
28.	Volume Threshold	Question 4	Conditional. Required if	Email address of the contact person		cftcBatch/cftcForm102/related Entity/contact@email

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Account Omnibus Account Originator Contact Email Address		accountCategory=' VT' AND isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption='N'	for the Originator entity		
29.	Volume Threshold Account Omnibus Account Originator Website	Question 4	Conditional. Required if information available AND if accountCategory=' VT' AND isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption='N'	URL of the Originator's website		cftcBatch/cftcForm102/related Entity@website

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
30.	Volume Threshold Account Omnibus Account Originator NFA ID	Question 4	Conditional. Required if information available AND if accountCategory=' VT' AND isOmnibus ='Y' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND foreignPrivacyExce ption='N'	The identification number given to the Originator entity by the National Futures Association		cftcBatch/cftcForm102/related Entity@NFAIdentifier
31.	Volume Threshold Account Omnibus Account Originator Legal Entity Identifier (LEI)	Question 4	Conditional. Required if accountCategory=' VT' AND isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted ='Y' AND foreignPrivacyExce ption='N'	The legal entity identifier (LEI) assigned to the Originator entity by the LEI issuer		cftcBatch/cftcForm102/related Entity@legalEntityIdentifier

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
32.	Volume Threshold Account Owner Indicator	Question 5	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' THEN isOwner='Y'	Indicates reportable Volume Threshold account owner	Y = Yes N = No	cftcBatch/cftcForm102/related Entity@isOwner
33.	Foreign Privacy Law Exception Indicator	Question 5	Conditional. Required if isOwner='Y'	Identifies if reported volume threshold account owner data is covered by foreign privacy-protection laws	Y = Yes N = No	cftcBatch/cftcForm102/related Entity@foreignPrivacyExceptio n
34.	Volume Threshold Account Owner Type Indicator	Question 5	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y'	Indicates whether the Volume Threshold account owner is a legal entity or natural person	LE = Legal Entity NP = Natural Person	cftcBatch/cftcForm102/related Entity@entityType
35.	Volume Threshold Account Owner Optional Fields or Supplemental	Question 5	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y'	Indicates that one or more "Optional Fields" or "Supplemental Fields" not included in this question were		cftcBatch/cftcForm102/related Entity@OptionalOrSuppFieldsS eparatelyReported

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
IF V(Fields Reported to LEI Provider	HOLD ACCOUNT OV	VNER IS A LEGAL ENTI	reported to the CICI Utility (or other CFTC-approved LEI provider) and are associated with the LEI provided in this submission		

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
37.	Volume Threshold Account Owner Last Name	Question 5	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND foreignPrivacyExce ption='N'	Surname of the natural person reportable account owner		cftcBatch/cftcForm102/related Entity@lastName
38.	Volume Threshold Account Owner First Name	Question 5	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND	Given or first in order name of the natural person reportable account owner		cftcBatch/cftcForm102/related Entity@firstName

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			foreignPrivacyExce ption='N'			
39.	Volume Threshold Account Owner Middle Name	Question 5	Conditional. Required if information available AND accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND foreignPrivacyExce ption='N'	Middle name of the natural person reportable account owner		cftcBatch/cftcForm102/related Entity@middleName
40.	Volume Threshold Account Owner Suffix	Question 5	Conditional. Required if information available AND accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y'	Suffix of the natural person reportable account owner		cftcBatch/cftcForm102/related Entity@nameSuffix

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
FOR	BOTH LEGAL EN	ITITIES AND NATUR	AND entityType='NP' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND foreignPrivacyExce ption='N' AL PERSONS			
41.	Volume Threshold Account Owner Street Address	Question 5	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	Street address of the reportable account owner		cftcBatch/cftcForm102/related Entity@street

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
42.	Volume Threshold Account Owner Suite	Question 5	Conditional. Required if information available AND accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	Suite of the reportable account owner		cftcBatch/cftcForm102/related Entity@suite
43.	Volume Threshold Account Owner City	Question 5	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo	City of the reportable account owner		cftcBatch/cftcForm102/related Entity@city

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			rted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'			
44.	Volume Threshold Account Owner State	Question 5	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/related Entity@state
45.	Volume Threshold Account Owner Country	Question 5	Conditional. Required if accountCategory=' VT' AND isOmnibus='N'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/related Entity@country

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND FollowOnInformati onToCome='N'			
46.	Volume Threshold Account Owner Zip/Postal Code	Question 5	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	Zip/Postal code of the reportable account owner		cftcBatch/cftcForm102/related Entity@postalCode
47.	Volume Threshold Account Owner Phone Number	Question 5	Conditional. Required if accountCategory=' VT' AND	Phone Number of the reportable account owner		cftcBatch/cftcForm102/related Entity@telephone

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
IF VO	LUME THRESH	OLD ACCOUNT OWN	isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N' ER IS A NATURAL F	PERSON		
48.	Volume Threshold Account Owner Email Address	Question 5	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND FollowOnInformati onToCome='N'	Email address of the reportable account owner		cftcBatch/cftcForm102/related Entity@email

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND foreignPrivacyExce ption='N'			
IF VO	LUME THRESH	OLD ACCOUNT OWN	ER IS A LEGAL ENTI	TY		
49.	Volume Threshold Account Owner Contact Last Name	Question 5	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	Surname of the natural person contact for the owner		cftcBatch/cftcForm102/related Entity/contact@lastName
50.	Volume Threshold Account Owner	Question 5	Conditional. Required if accountCategory=' VT'	First name of the natural person contact for the owner		cftcBatch/cftcForm102/related Entity/contact@firstName

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Contact First Name		AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'			
51.	Volume Threshold Account Owner Contact Middle Name	Question 5	Conditional. Required if information available AND accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo	Middle name of the natural person contact for the owner		cftcBatch/cftcForm102/related Entity/contact@middleName

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			rted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'			
52.	Volume Threshold Account Owner Contact Suffix	Question 5	Conditional. Required if information available AND accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	Suffix of the natural person contact for the owner		cftcBatch/cftcForm102/related Entity/contact@nameSuffix
53.	Volume Threshold	Question 5	Conditional. Required if	Job title of the contact person at		cftcBatch/cftcForm102/related Entity/contact@titleOrPosition

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Account Owner Contact Job Title		accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	for the ownership entity		
54.	Contact Relationship to Volume Threshold Account Owner	Question 5	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo	Contact relationship to the ownership entity		cftcBatch/cftcForm102/related Entity/contact@relationship

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			rted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'			
55.	Volume Threshold Account Owner Contact Phone Number	Question 5	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	Phone number of the contact person for the ownership entity		cftcBatch/cftcForm102/related Entity/contact@telephone
56.	Volume Threshold Account Owner	Question 5	Conditional. Required if accountCategory=' VT'	Email address of the contact person for the ownership entity		cftcBatch/cftcForm102/related Entity/contact@email

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Contact Email Address		AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'			
57.	Volume Threshold Account Owner Website	Question 5	Conditional. Required if information available AND, if accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND FollowOnInformati	URL of the owner's website		cftcBatch/cftcForm102/related Entity@website

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			onToCome='N' AND foreignPrivacyExce ption='N'			
58.	Volume Threshold Account Owner NFA ID	Question 5	Conditional. Required if information available AND accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	The identification number given to the ownership entity by the National Futures Association		cftcBatch/cftcForm102/related Entity@NFAIdentifier
59.	Volume Threshold Account Owner Legal Entity Identifier (LEI)	Question 5	Conditional. Required if information available AND accountCategory=' VT'	The legal entity identifier (LEI) assigned to the ownership entity by the LEI issuer		cftcBatch/cftcForm102/related Entity@legalEntityIdentifier

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
VOL	IMF THRESHOI	D ACCOUNT CONTRO	AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted ='Y' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'			
, oze	, , , , , , , , , , , , , , , , , , ,	Diddooni comin				
60.	Volume Threshold Account Controller Indicator	Question 6	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' THEN isController='Y'	Indicates reporting Volume Threshold account Controller	Y = Yes N = No	cftcBatch/cftcForm102/related Entity@isController
61.	Foreign Privacy Law Exception Indicator	Question 6	Conditional. Required if isController='Y'	Identifies if reported volume threshold account controller data is covered by foreign	Y = Yes N = No	cftcBatch/cftcForm102/related Entity@foreignPrivacyExceptio n

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				privacy-protection laws		
62.	Volume Threshold Account Controller Entity Type	Question 6	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isController='Y' THEN entityType='NP'		NP = Natural Person	cftcBatch/cftcForm102/related Entity@entityType
63.	Volume Threshold Account Controller Client Reporting Issue Indicator	Question 6	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isController='Y'		0 = All volume threshold account controller information is availiable and reported on form 1 = Client did not provide 2 = Data supplied by client does not appear to meet the CFTC definition of trading account controller	cftcBatch/cftcForm102/related Entity@clientReportingIssue

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
64.	Volume Threshold Account Controller Natural Person Last Name	Question 6	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isController='Y' AND clientReportingIss ue='0' AND foreignPrivacyExce ption='N'	Surname of the natural person reportable account Controller		cftcBatch/cftcForm102/related Entity@lastName
65.	Volume Threshold Account Controller Natural Person First Name	Question 6	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isController='Y' AND clientReportingIss ue='0' AND foreignPrivacyExce ption='N'	Given or first in order name of the natural person reportable account Controller		cftcBatch/cftcForm102/related Entity@firstName
66.	Volume Threshold	Question 6	Conditional. Required if	Middle name of the natural person		cftcBatch/cftcForm102/related Entity@middleName

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Account Controller Natural Person Middle Name		information available AND accountCategory=' VT' AND isOmnibus='N' AND isController='Y' AND clientReportingIss ue='0' AND foreignPrivacyExce ption='N'	reportable account Controller		
67.	Volume Threshold Account Controller Natural Person Suffix	Question 6	Conditional. Required if information available AND accountCategory=' VT' AND isOmnibus='N' AND isController='Y' AND clientReportingIss ue='0' AND foreignPrivacyExce ption='N'	Suffix of the natural person reportable account Controller		cftcBatch/cftcForm102/related Entity@nameSuffix

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
68.	Volume Threshold Account Controller Street Address	Question 6	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND clientReportingIss ue='0' AND foreignPrivacyExce ption='N'	Street address of the reportable account Controller		cftcBatch/cftcForm102/related Entity@street
69.	Volume Threshold Account Controller Suite	Question 6	Conditional (not required), if accountCategory=' VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND	Suite of the reportable account Controller		cftcBatch/cftcForm102/related Entity@suite

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			clientReportingIss ue='0' AND foreignPrivacyExce ption='N'			
70.	Volume Threshold Account Controller City	Question 6	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND clientReportingIss ue='0' AND foreignPrivacyExce ption='N'	City of the reportable account Controller		cftcBatch/cftcForm102/related Entity@city
71.	Volume Threshold Account Controller State	Question 6	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isController='Y'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/related Entity@state

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND FollowOnInformati onToCome='N' AND clientReportingIss ue='0' AND foreignPrivacyExce ption='N'			
72.	Volume Threshold Account Controller Country	Question 6	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND clientReportingIss ue='0'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/related Entity@country
73.	Volume Threshold Account Controller Zip/Postal Code	Question 6	Conditional. Required if accountCategory=' VT' AND isOmnibus='N'	Zip/Postal code of the reportable account Controller		cftcBatch/cftcForm102/related Entity@postalCode

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND isController='Y' AND FollowOnInformati onToCome='N' AND clientReportingIss ue='0' AND foreignPrivacyExce ption='N'			
74.	Volume Threshold Account Controller Phone Number	Question 6	Conditional. Required if information available AND accountCategory=' VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	Phone Number of the reportable account Controller		cftcBatch/cftcForm102/related Entity@telephone
75.	Volume Threshold	Question 6	Conditional. Required if			cftcBatch/cftcForm102/related Entity@employerName

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Account Controller Name of Employer		information available AND accountCategory=' VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'			
76.	Volume Threshold Account Controller Employer NFA ID	Question 6	Conditional. Required if information available AND accountCategory=' VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND			cftcBatch/cftcForm102/related Entity@employerNFAIdentifier

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			foreignPrivacyExce ption='N'			
77.	Volume Threshold Account Controller Employer Legal Entity Identifier	Question 6	Conditional. Required if information available AND accountCategory=' VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'			cftcBatch/cftcForm102/related Entity@employerLEI
78.	Volume Threshold Account Controller Job Title	Question 6	Conditional. Required if information available AND accountCategory=' VT' AND isOmnibus='N' AND isController='Y'	Job title of the contact person forthe Controller entity		cftcBatch/cftcForm102/related Entity@titleOrPosition

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'			
79.	Relationship to Volume Threshold Account Owner	Question 6	Conditional. Required if information available AND accountCategory=' VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	Contact relationship to trading account owner		cftcBatch/cftcForm102/related Entity@relationship
80.	Volume Threshold Account Controller Email Address	Question 6	Conditional. Required if information available AND accountCategory=' VT'	Email address of the reportable account Controller		cftcBatch/cftcForm102/related Entity@email

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'			
81.	Volume Threshold Account Controller NFA ID	Question 6	Conditional. Required if information available AND accountCategory=' VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformati onToCome='N' AND foreignPrivacyExce ption='N'	The identification number given to the Controller entity by the National Futures Association		cftcBatch/cftcForm102/related Entity@NFAIdentifier
82.	Reporting Firm	Signature/Authenti cation	Yes	Indicates if the submitter is duly	Y = authorized N = not authorized	cftcBatch/cftcForm102/contact@isAuthorizedRepresentative

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Authorization Indicator			authorized by the reporting firm to provide the information and representations submitted on this Form 102, and that information and representations are true and correct		
83.	Authorized Representativ e Last Name	Signature/Authenti cation	Yes	Surname of the authorized representative		cftcBatch/cftcForm102/contac t@lastName
84.	Authorized Representativ e First Name	Signature/Authenti cation	Yes	Given or first in order name of the authorized representative		cftcBatch/cftcForm102/contac t@firstName
85.	Authorized Representativ e Middle Name	Signature/Authenti cation	Yes	Middle name of the authorized representative		cftcBatch/cftcForm102/contac t@middleName
86.	Authorized Representativ e Name Suffix	Signature/Authenti cation	Yes	Generation or name suffix of the authorized representative		cftcBatch/cftcForm102/contac t@nameSuffix

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	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
87.	Authorized Representativ e Position	Signature/Authenti cation	Yes	Job position of the authorized representative		cftcBatch/cftcForm102/contac t@titleOrPosition
88.	Authorized Representativ e Submitted on behalf of	Signature/Authenti cation	Yes	Reporting Firm Name 102 was submitted on behalf of		cftcBatch/cftcForm102@onBe halfOf
89.	Date of Submission	Signature/Authenti cation	Yes	Date [indicated by the authorized representative] that the form was submitted to CFTC		cftcBatch/cftcForm102@submi tDate

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Data Dictionary for Form 102S – Identifying and reporting a consolidated account 19

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
1.	New/Modified Indicator	Question 1	Yes	Indicates whether the consolidated account (102S) is:	N = New M = Modified	cftcBatch/cftcForm102@infor mationType

Visit this link to view a pdf copy of the OCR Final Rule: http://www.cftc.gov/ucm/groups/public/@lrfederalregister/documents/file/2013-26789a.pdf

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¹⁹ When reviewing the data elements in this Technical Document, reporting parties should also review and consult the OCR Final Rule, including the requirements of the reporting forms attached as an appendix thereto. The reporting forms are the basis for these data elements. Reporting parties should visit this link to view the OCR Final Rule on the Federal Register: https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				n for a previously reported counterpa rty or customer		
2.	102S Counterparty Identifier	Question 2	Yes	A unique identifier for each reporting entity or counterparty/cust omer as assigned by the reporting entity		cftcBatch/cftcForm102@accou ntNumber
3.	Special Account Indicator	Question 2	Yes	If the reporting entity currently identifies a counterparty via Section 102A of a Form 102, the identifier used on Section 102A of the Form 102 may also be used for the 102S identifier, as long as the same legal entity is referenced.	Y = Yes N = No	cftcBatch/cftcForm102@isSpe cialAccount

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				Indicates if the same identifier is being so used.		
4.	House or Customer Indicator	Question 3i	No	Consolidated account type	H = House C = Customer	cftcBatch/cftcForm102@accou ntClass
5.	Consolidated Account Omnibus Account Indicator	Question 3ii	Yes	Is the reportable consolidated account an omnibus account, or used to execute trades for an omnibus account	Y = Yes N = No	cftcBatch/cftcForm102@isOm nibus
6.	House or Customer Indicator	Question 3ii	Conditional. Required if isOmnibus ='Y'	If the reported Consolidated Account is being reported as an Omnibus Account indicate whether the Volume Threshold Account Omnibus Account is a house or customer account of the reporting firm	H = House C = Customer	cftcBatch/cftcForm102@accou ntClass

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CONS	Data Element SOLIDATED ACC	Form 102S Question Number COUNT OWNERSHIP	Required AND CONTROL INFO	CFTC Description, Purpose or Instruction ORMATION	Valid Values	XML
OMN	IBUS ACCOUNT	INFORMATION				
7.	Consolidated Account Omnibus Account Originator Indicator	Question 3ii	Conditional. Required if isOmnibus ='Y' THEN isOriginator = 'Y'	Indicates reporting Consolidated Account Omnibus Account originator	Y = Yes N = No	cftcBatch/cftcForm102/related Entity@isOriginator
8.	Foreign Privacy Law Exception Indicator		Conditional. Required if isOmnibus ='Y'	Identifies if reported omnibus originator data is covered by foreign privacy-protection laws	Y = Yes N = No	cftcBatch/cftcForm102/related Entity@foreignPrivacyExceptio n
9.	Consolidated Account Omnibus Account Optional Fields or Supplemental Fields Reported to LEI Provider	Question 3ii	Conditional. Required if isOmnibus ='Y'	Indicates that one or more "Optional Fields" or "Supplemental Fields" not included in this question were reported to the CICI Utility (or other CFTC-approved LEI	Y = Yes N = No	cftcBatch/cftcForm102/related Entity@OptionalOrSuppFieldsS eparatelyReported

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				provider) and are associated with the LEI provided in this submission		
10.	Consolidated Account Omnibus Account Entity Type	Question 3ii	Yes, entityType='LE'		LE=Legal Entity	cftcBatch/cftcForm102/related Entity@entityType
11.	Consolidated Account Omnibus Account Originator Name	Question 3ii	Conditional. Required if isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption = 'N'	Name of the reportable account Originator		cftcBatch/cftcForm102/related Entity@legalEntityName
12.	Consolidated Account Omnibus Account Originator Street Address	Question 3ii	Conditional. Required if isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption = 'N'	Street address of the reportable account Originator		cftcBatch/cftcForm102/related Entity@street

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
13.	Consolidated Account Omnibus Account Originator Suite	Question 3ii	Conditional. Required if information available ANDisOmnibus ='Y' AND OptionalOrSuppFie ldsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption = 'N'	Suite of the reportable account Originator		cftcBatch/cftcForm102/related Entity@suite
14.	Consolidated Account Omnibus Account Originator City	Question 3ii	Conditional. Required if isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption = 'N'	City of the reportable account Originator		cftcBatch/cftcForm102/related Entity@city
15.	Consolidated Account Omnibus Account	Question 3ii	Conditional. Required if isOmnibus ='Y' AND	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric		cftcBatch/cftcForm102/related Entity@state

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Originator State		OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption = 'N'	characters		
16.	Consolidated Account Omnibus Account Originator Country	Question 3ii	Conditional. Required if isOmnibus ='Y' AND OptionalOrSuppFie ldsSeparatelyRepo rted = 'N'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/related Entity@country
17.	Consolidated Account Omnibus Account Originator Zip/Postal Code	Question 3ii	Conditional. Required if isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption = 'N'	Zip/Postal code of the reportable account Originator		cftcBatch/cftcForm102/related Entity@postalCode
18.	Consolidated Account Omnibus Account Originator Phone Number	Question 3ii	Conditional. Required if isOmnibus ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND	Phone Number of the reportable account Originator		cftcBatch/cftcForm102/related Entity@telephone

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			foreignPrivacyExce ption = 'N'			
19.	Consolidated Account Omnibus Account Originator Contact Last Name	Question 3ii	Conditional. Required if isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption = 'N'	Surname of the natural person contact for the Originator		cftcBatch/cftcForm102/related Entity/contact@lastName
20.	Consolidated Account Omnibus Account Originator Contact First Name	Question 3ii	Conditional. Required if isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption = 'N'	First name of the natural person contact for the Originator		cftcBatch/cftcForm102/related Entity/contact@firstName
21.	Consolidated Account Omnibus	Question 3ii	Conditional. Required if information	Middle name of the natural person contact for the		cftcBatch/cftcForm102/related Entity/contact@middleName

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Account Contact Middle Name		available ANDisOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption = 'N'	Originator		
22.	Consolidated Account Omnibus Account Contact Suffix	Question 3ii	Conditional. Required if information available AND isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption = 'N'	Suffix of the natural person contact for the Originator		cftcBatch/cftcForm102/related Entity/contact@nameSuffix
23.	Consolidated Account Omnibus Account	Question 3ii	Conditional. Required if isOmnibus ='Y' AND	Job title of the contact person for the Originator entity		cftcBatch/cftcForm102/related Entity/contact@titleOrPosition

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Originator Contact Job Title		entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption = 'N'			
24.	Contact Relationship to Consolidated Account Omnibus Account Originator	Question 3ii	Conditional, ifConditional. Required if isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption = 'N'	Contact relationship to the Originator entity		cftcBatch/cftcForm102/related Entity/contact@relationship
25.	Consolidated Account Omnibus Account Originator Contact Phone Number	Question 3ii	Conditional. Required if isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted = 'N' AND	Phone number of the contact person for the Originator entity		cftcBatch/cftcForm102/related Entity/contact@telephone

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			foreignPrivacyExce ption = 'N'			
26.	Consolidated Account Omnibus Account Originator Contact Email Address	Question 3ii	Conditional. Required if isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted = 'N' AND foreignPrivacyExce ption = 'N'	Email address of the contact person for the Originator entity		cftcBatch/cftcForm102/related Entity/contact@email
27.	Consolidated Account Omnibus Account Originator Website	Question 3ii	Conditional. Required if information available AND isOmnibus ='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'	URL of the Originator's website		cftcBatch/cftcForm102/related Entity@website

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
28.	Consolidated Account Omnibus Account Originator NFA ID	Question 3ii	Conditional. Required if information available AND isOmnibus ='Y' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'	The identification number given to the Originator entity by the National Futures Association		cftcBatch/cftcForm102/related Entity@NFAIdentifier
29.	Consolidated Account Omnibus Account Originator Legal Entity Identifier (LEI)	Question 3ii	Conditional. Required if information available AND isOmnibus='Y' AND OptionalOrSuppFie ldsSeparatelyRepo rted='Y' AND foreignPrivacyExce ption = 'N'	The legal entity identifier (LEI) assigned to the Originator entity by the LEI issuer		cftcBatch/cftcForm102/related Entity@legalEntityIdentifier

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
30.	Consolidated Account Counterparty Indicator		Conditional. Required if isOmnibus='N' THEN isCounterparty='Y'	Indicates reportable Consolidated account counterparty	Y = Yes N = No	cftcBatch/cftcForm102/related Entity@isCounterparty
31.	Foreign Privacy Law Exception Indicator		Conditional. Required if isCounterparty ='Y'	Identifies if reported counterparty data is covered by foreign privacy-protection laws	Y = Yes N = No	cftcBatch/cftcForm102/related Entity@foreignPrivacyExceptio n
32.	Consolidated Account Counterparty Type Indicator		Conditional. Required if isOmnibus='N' AND isCounterparty ='Y'	Indicates whether the Consolidated account counterparty is a legal entity or natural person	LE = Legal Entity NP = Natural Person	cftcBatch/cftcForm102/related Entity@entityType
33.	Consolidated Account Counterparty Optional Fields or Supplemental Fields Reported to LEI Provider		Conditional. Required if isOmnibus='N' AND isCounterparty='Y'	Indicates that one or more "Optional Fields" or "Supplemental Fields" not included in this question were reported to the CICI Utility (or other CFTC-approved LEI	Y = Yes N = No	cftcBatch/cftcForm102/related Entity@OptionalOrSuppFieldsS eparatelyReported

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IF CO	Data Element ONSOLIDATED A	Form 102S Question Number ACCOUNT COUNTER	Required PARTY IS A LEGAL E	CFTC Description, Purpose or Instruction provider) and are associated with the LEI provided in this submission	Valid Values	XML
34.	Consolidated Account Counterparty Legal Entity Name		Conditional. Required if isOmnibus='N' AND isCounterparty='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'	Legal or registered name of the reportable account counterparty		cftcBatch/cftcForm102/related Entity@legalEntityName
IF CO	NSOLIDATED A	ACCOUNT COUNTER	PARTY IS A NATURA			
35.	Consolidated Account Counterparty Last Name		Conditional. Required if isOmnibus='N' AND isCounterparty='Y' AND	Surname of the natural person reportable account counterparty		cftcBatch/cftcForm102/related Entity@lastName

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			entityType='NP' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'			
36.	Consolidated Account Counterparty First Name		Conditional. Required if isOmnibus='N' AND isCounterparty='Y' AND entityType='NP' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'	Given or first in order name of the natural person reportable account counterparty		cftcBatch/cftcForm102/related Entity@firstName
37.	Consolidated Account Counterparty Middle Name		Conditional. Required if information available AND isOmnibus='N' AND isCounterparty='Y' AND	Middle name of the natural person reportable account counterparty		cftcBatch/cftcForm102/related Entity@middleName

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			entityType='NP' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'			
38.	Consolidated Account Counterparty Suffix		Conditional. Required if information available AND isOmnibus='N' AND isCounterparty='Y' AND entityType='NP' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'	Suffix of the natural person reportable account counterparty		cftcBatch/cftcForm102/related Entity@nameSuffix
FOR 1	BOTH LEGAL EN	NTITIES AND NAT	URAL PERSONS			
39.	Consolidated Account Counterparty		Conditional. Required if isOmnibus='N'	Street address of the reportable account		cftcBatch/cftcForm102/related Entity@street

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Street Address		AND isCounterparty ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'	counterparty		
40.	Consolidated Account Counterparty Suite		Conditional. Required if isOmnibus='N' AND isCounterparty ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'	Suite of the reportable account counterparty		cftcBatch/cftcForm102/related Entity@suite
41.	Consolidated Account Counterparty City		Conditional. Required if isOmnibus='N' AND isCounterparty ='Y' AND	City of the reportable account counterparty		cftcBatch/cftcForm102/related Entity@city

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'			
42.	Consolidated Account Counterparty State		Conditional. Required if isOmnibus='N' AND isCounterparty ='Y' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/related Entity@state
43.	Consolidated Account Counterparty Country		Conditional. Required if isOmnibus='N' AND isCounterparty ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @country

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
44.	Consolidated Account Counterparty Zip/Postal Code		Conditional. Required if isOmnibus='N' AND isCounterparty ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'	Zip/Postal code of the reportable account counterparty		cftcBatch/cftcForm102/related Entity@postalCode
45.	Consolidated Account Counterparty Phone Number		Conditional. Required if isOmnibus='N' AND isCounterparty ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'	Phone Number of the reportable account counterparty		cftcBatch/cftcForm102/related Entity@telephone

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
46.	Consolidated Account Counterparty Email Address		Conditional. Required if isOmnibus='N' AND isCounterparty='Y' AND entityType='NP' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'	Email address of the reportable account counterparty		cftcBatch/cftcForm102/related Entity@email
IF CO	NSOLIDATED A	CCOUNT COUNTERP	ARTY IS A LEGAL E	NTITY		
47.	Consolidated Account Counterparty Contact Last Name		Conditional. Required if isOmnibus='N' AND isCounterparty='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'	Surname of the contact person for the counterparty		cftcBatch/cftcForm102/related Entity/contact@lastName

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
48.	Consolidated Account Counterparty Contact First Name		Conditional. Required if isOmnibus='N' AND isCounterparty ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'	First name of the contact person for the counterparty		cftcBatch/cftcForm102/related Entity/contact@firstName
49.	Consolidated Account Counterparty Contact Middle Name		Conditional. Required if information available AND isOmnibus='N' AND isCounterparty ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND	Middle name of the contact person for the counterparty		cftcBatch/cftcForm102/related Entity/contact@middleName

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			foreignPrivacyExce ption = 'N'			
50.	Consolidated Account Counterparty Contact Suffix		Conditional. Required if information available AND isOmnibus='N' AND isCounterparty ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'	Suffix of the contact person for the counterparty		cftcBatch/cftcForm102/related Entity/contact@nameSuffix
51.	Consolidated Account Counterparty Contact Job Title		Conditional. Required if isOmnibus='N' AND isCounterparty ='Y' AND entityType='LE' AND OptionalOrSuppFie	Job title of the contact person for the counterparty entity		cftcBatch/cftcForm102/related Entity/contact@titleOrPosition

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			IdsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'			
52.	Contact Relationship to Consolidated Account Counterparty		Conditional. Required if isOmnibus='N' AND isCounterparty ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'	Contact relationship to the counterparty entity		cftcBatch/cftcForm102/related Entity/contact@relationship
53.	Consolidated Account Counterparty Contact Phone Number		Conditional. Required if isOmnibus='N' AND isCounterparty ='Y' AND entityType='LE' AND OptionalOrSuppFie	Phone number of the contact person for the counterparty entity		cftcBatch/cftcForm102/related Entity/contact@telephone

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			IdsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'			
54.	Consolidated Account Counterparty Contact Email Address		Conditional. Required if isOmnibus='N' AND isCounterparty ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'	Email address of the contact person for the counterparty entity		cftcBatch/cftcForm102/related Entity/contact@email
55.	Consolidated Account Counterparty Website		Conditional. Required if information available AND isOmnibus='N' AND isCounterparty ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo	URL of the counterparty's website		cftcBatch/cftcForm102/related Entity@website

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			rted='N' AND foreignPrivacyExce ption = 'N'			
56.	Consolidated Account Counterparty NFA ID		Conditional. Required if information available AND isOmnibus='N' AND isCounterparty ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'	The identification number given to the counterparty entity by the National Futures Association		cftcBatch/cftcForm102/related Entity@NFAIdentifier
57.	Consolidated Account Counterparty Legal Entity Identifier (LEI)		Conditional. Required if information available AND isOmnibus='N' AND isCounterparty ='Y' AND OptionalOrSuppFie IdsSeparatelyRepo	The legal entity identifier (LEI) assigned to the counterparty entity by the LEI issuer		cftcBatch/cftcForm102/related Entity@legalEntityIdentifier

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			rted ='Y' AND foreignPrivacyExce ption = 'N'			
CONS	SOLIDATED ACC	OUNT OWNER(S)				
58.	Consolidated Account Owner Indicator	Question 3iii	Conditional. Required if information available AND isOmnibus='N' THEN isOwner='Y'	Indicates reportable Consolidated account owner	Y = Yes N = No	cftcBatch/cftcForm102/related Entity@isOwner
59.	Consolidated Account Owner Type Indicator	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y'	Indicates whether the Consolidated account owner is a legal entity or natural person	LE = Legal Entity NP = Natural Person	cftcBatch/cftcForm102/related Entity@entityType
60.	Consolidated Account Owner Optional Fields or Supplemental Fields Reported to LEI Provider	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y'	Indicates that one or more "Optional Fields" or "Supplemental Fields" not included in this question were reported to the CICI Utility (or other CFTC-	Y = Yes N = No	cftcBatch/cftcForm102/related Entity@OptionalOrSuppFieldsS eparatelyReported

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				approved LEI provider) and are associated with the LEI provided in this submission		
IF CO	NSOLIDATED A	CCOUNT OWNER IS	A LEGAL ENTITY			
61.	Consolidated Account Owner Legal Entity Name	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	Legal or registered name of the reportable account owner		cftcBatch/cftcForm102/related Entity@legalEntityName
IF CO	NSOLIDATED A	CCOUNT OWNER IS	A NATURAL PERSO	N		
62.	Consolidated Account Owner Last Name	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y'	Surname of the natural person reportable account owner		cftcBatch/cftcForm102/related Entity@lastName

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND entityType='NP' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'			
63.	Consolidated Account Owner First Name	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	Given or first in order name of the natural person reportable account owner		cftcBatch/cftcForm102/related Entity@firstName
64.	Consolidated Account Owner Middle Name	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFie	Middle name of the natural person reportable account owner		cftcBatch/cftcForm102/related Entity@middleName

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			ldsSeparatelyRepo rted='N'			
65.	Consolidated Account Owner Suffix	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	Suffix of the natural person reportable account owner		cftcBatch/cftcForm102/related Entity@nameSuffix
FOR I	BOTH LEGAL EN	NTITIES AND NATUR	AL PERSONS			
66.	Consolidated Account Owner Street Address	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	Street address of the reportable account owner		cftcBatch/cftcForm102/related Entity@street

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
67.	Consolidated Account Owner Suite	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	Suite of the reportable account owner		cftcBatch/cftcForm102/related Entity@suite
68.	Consolidated Account Owner City	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'	City of the reportable account owner		cftcBatch/cftcForm102/related Entity@city
69.	Consolidated Account Owner State	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/related Entity@state

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			ldsSeparatelyRepo rted='N'			
70.	Consolidated Account Owner Country	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @country
71.	Consolidated Account Owner Zip/Postal Code	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	Zip/Postal code of the reportable account owner		cftcBatch/cftcForm102/related Entity@postalCode
72.	Consolidated Account Owner Phone Number	Question 3iii	Conditional. Required if information available AND isOmnibus='N'	Phone Number of the reportable account owner		cftcBatch/cftcForm102/related Entity@telephone

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND isOwner='Y' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'			
IF CO	NSOLIDATED A	CCOUNT OWNER IS	A NATURAL PERSO	N		
73.	Consolidated Account Owner Email Address	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	Email address of the reportable account owner		cftcBatch/cftcForm102/related Entity@email
IF CO	NSOLIDATED A	ACCOUNT OWNER IS	A LEGAL ENTITY			
74.	Consolidated Account Owner Contact Last Name	Question 3iii	Conditional. Required if information available AND isOmnibus='N'	Surname of the contact person for the owner		cftcBatch/cftcForm102/related Entity/contact@lastName

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'			
75.	Consolidated Account Owner Contact First Name	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'	First name of the contact person for the owner		cftcBatch/cftcForm102/related Entity/contact@firstName
76.	Consolidated Account Owner Contact Middle Name	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND	Middle name of the contact person for the owner		cftcBatch/cftcForm102/related Entity/contact@middleName

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			OptionalOrSuppFie IdsSeparatelyRepo rted='N'			
77.	Consolidated Account Owner Contact Suffix	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	Suffix of the contact person for the owner		cftcBatch/cftcForm102/related Entity/contact@nameSuffix
78.	Consolidated Account Owner Contact Job Title	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	Job title of the contact person for the ownership entity		cftcBatch/cftcForm102/related Entity/contact@titleOrPosition

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
79.	Contact Relationship to Consolidated Account Owner	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	Contact relationship to the ownership entity		cftcBatch/cftcForm102/related Entity/contact@relationship
80.	Consolidated Account Owner Contact Phone Number	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	Phone number of the contact person for the ownership entity		cftcBatch/cftcForm102/related Entity/contact@telephone
81.	Consolidated Account Owner Contact Email	Question 3iii	Conditional. Required if information available AND	Email address of the contact person for the ownership entity		cftcBatch/cftcForm102/related Entity/contact@email

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Address		isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'			
82.	Consolidated Account Owner Website	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'	URL of the owner's website		cftcBatch/cftcForm102/related Entity@website
83.	Consolidated Account Owner NFA ID	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'	The identification number given to the ownership entity by the National Futures Association		cftcBatch/cftcForm102/related Entity@NFAIdentifier

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
84.	Consolidated Account Owner Legal Entity Identifier (LEI)	Question 3iii OUNT CONTROLLER	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted ='Y'	The legal entity identifier (LEI) assigned to the ownership entity by the LEI issuer		cftcBatch/cftcForm102/related Entity@legalEntityIdentifier
CONS	OLIDA I ED ACC	OUNT CONTROLLER	(3)			
85.	Consolidated Account Controller Indicator	Question 3iv	Conditional. Required if information available AND isOmnibus='N' THEN isController='Y'	Indicates reporting Consolidated account Controller	Y = Yes N = No	cftcBatch/cftcForm102/related Entity@isController
86.	Consolidated Account Controller Entity Type	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController='Y'		LE = Legal Entity NP = Natural Person	cftcBatch/cftcForm102/related Entity@entityType

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
87.	Consolidated Account Controller Optional Fields or Supplemental Fields Reported to LEI Provider	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController='Y'	Indicates that one or more "Optional Fields" or "Supplemental Fields" not included in this question were reported to the CICI Utility (or other CFTC-approved LEI provider) and are associated with the LEI provided in this submission	Y = Yes N = No	cftcBatch/cftcForm102/related Entity@OptionalOrSuppFieldsS eparatelyReported
88.	Consolidated Account Controller Legal Entity Name	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController='Y' AND entityType='LE' AND OptionalOrSuppFie	Legal or registered name of the reportable account Controller		cftcBatch/cftcForm102/related Entity@legalEntityName

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	Data Element	Form 102S Question Number	Required IdsSeparatelyRepo	CFTC Description, Purpose or Instruction	Valid Values	XML
IF CO	ONSOLIDATED A	ACCOUNT CONTROL	rted='N'	PERSON		
89.	Consolidated Account Controller Natural Person Last Name	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController='Y' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	Surname of the natural person reportable account Controller		cftcBatch/cftcForm102/related Entity@lastName
90.	Consolidated Account Controller Natural Person First Name	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController='Y' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	Given or first in order name of the natural person reportable account Controller		cftcBatch/cftcForm102/related Entity@firstName

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
91.	Consolidated Account Controller Natural Person Middle Name	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'			cftcBatch/cftcForm102/related Entity@middleName
92.	Consolidated Account Controller Natural Person Suffix	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AL PERSONS			cftcBatch/cftcForm102/related Entity@nameSuffix
93.	Consolidated	Question 3iv	Conditional.	Street address of		cftcBatch/cftcForm102/related
33.	Account Controller		Required if information	the reportable account Controller		Entity@street

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Street Address		available AND isOmnibus='N' AND isController='Y' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'			
94.	Consolidated Account Controller Suite	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'	Suite of the reportable account Controller		cftcBatch/cftcForm102/related Entity@suite
95.	Consolidated Account Controller City	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController='Y' AND OptionalOrSuppFie	City of the reportable account Controller		cftcBatch/cftcForm102/related Entity@city

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			ldsSeparatelyRepo rted='N'			
96.	Consolidated Account Controller State	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController='Y' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/related Entity@state
97.	Consolidated Account Controller Country	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController='Y'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/related Entity@country
98.	Consolidated Account Controller Zip/Postal Code	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController='Y'	Zip/Postal code of the reportable account Controller		cftcBatch/cftcForm102/related Entity@postalCode

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'			
99.	Consolidated Account Controller Phone Number	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController='Y' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	Phone Number of the reportable account Controller		cftcBatch/cftcForm102/related Entity@telephone
100.	Consolidated Account Controller Email Address	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController='Y' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	Email address of the reportable account Controller		cftcBatch/cftcForm102/related Entity@email

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IF CO	Data Element NSOLIDATED A	Form 102S Question Number CCOUNT CONTROLL	Required LER IS A LEGAL ENT	CFTC Description, Purpose or Instruction	Valid Values	XML
101.	Consolidated Account Controller Contact Last Name	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	Surname of the contact person for the owner		cftcBatch/cftcForm102/related Entity/contact@lastName
102.	Consolidated Account Controller Contact First Name	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	First name of the contact person for the owner		cftcBatch/cftcForm102/related Entity/contact@firstName

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
103.	Consolidated Account Controller Contact Middle Name	Question 3iv	Conditional. Required if information available ANDisOmnibus='N ' AND isController ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	Middle name of the contact person for the owner		cftcBatch/cftcForm102/related Entity/contact@middleName
104.	Consolidated Account Controller Contact Suffix	Question 3iv	Conditional. Required if information available ANDisOmnibus='N ' AND isController ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	Suffix of the contact person for the owner		cftcBatch/cftcForm102/related Entity/contact@nameSuffix
105.	Consolidated Account	Question 3iv	Conditional. Required if	Job title of the contact person at		cftcBatch/cftcForm102/related Entity/contact@titleOrPosition

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Controller Contact Job Title		information available AND isOmnibus='N' AND isController ='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'	or related to the controller entity		
106.	Contact Relationship to Consolidated Account Controller	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'	Contact relationship to controller entity		cftcBatch/cftcForm102/related Entity/contact@relationship
107.	Consolidated Account Controller Contact Phone	Question 3iv	Conditional. Required if information available AND isOmnibus='N'	Phone number of the contact person for the controller entity		cftcBatch/cftcForm102/related Entity/contact@telephone

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Number		AND isController ='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N'			
108.	Consolidated Account Controller Contact Email Address	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController ='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'	Email address of the contact person for the controller entity		cftcBatch/cftcForm102/related Entity/contact@email
109.	Consolidated Account Controller NFA ID	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController ='Y' AND OptionalOrSuppFie	The identification number given to the controller entity by the National Futures Association		cftcBatch/cftcForm102/related Entity@NFAIdentifier

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			ldsSeparatelyRepo rted='N'			
110.	Consolidated Account Controller Legal Entity Identifier (LEI)	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController ='Y' AND OptionalOrSuppFie ldsSeparatelyRepo rted ='Y'	The legal entity identifier (LEI) assigned to the controller entity by the LEI issuer		cftcBatch/cftcForm102/related Entity@legalEntityIdentifier
111.	Paired Swap Indicator	Question 4	No	Indicates if response is related to paired swap activity		cftcBatch/cftcForm102/paired SwapOrSwaptionActivity@isSw ap
112.	Paired Swaption Indicator	Question 4	No	Indicates if response is related to paired swaption activity		cftcBatch/cftcForm102/paired SwapOrSwaptionActivity@isSw aption
113.	Paired Swaps and Swaptions Market Activity	Question 4	No	Description of the nature of the counterparty's or customer's paired swaps and		cftcBatch/cftcForm102/paired SwapOrSwaptionActivity@des cription

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				swaptions market activity		
114.	Reporting Firm Authorization Indicator	Signature/Authenti cation	Yes	Indicates if the submitter is duly authorized by the reporting firm to provide the information and representations submitted on this Form 102, and that information and representations are true and correct	Y = authorized N = not authorized	cftcBatch/cftcForm102/contac t@isAuthorizedRepresentative
115.	Authorized Representativ e Last Name	Signature/Authenti cation	Yes	Surname of the authorized representative		cftcBatch/cftcForm102/contac t@lastName
116.	Authorized Representativ e First Name	Signature/Authenti cation	Yes	Given or first in order name of the authorized representative		cftcBatch/cftcForm102/contac t@firstName
117.	Authorized Representativ e Middle Name	Signature/Authenti cation	Yes	Middle name of the authorized representative		cftcBatch/cftcForm102/contac t@middleName

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	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
118.	Authorized Representativ e Name Suffix	Signature/Authenti cation	Yes	Generation or name suffix of the authorized representative		cftcBatch/cftcForm102/contac t@nameSuffix
119.	Authorized Representativ e Position	Signature/Authenti cation	Yes	Job position of the authorized representative		cftcBatch/cftcForm102/contac t@titleOrPosition
120.	Authorized Representativ e Submitted on behalf of	Signature/Authenti cation	Yes	Reporting Firm Name 102 was submitted on behalf of		cftcBatch/cftcForm102@onBe halfOf
121.	Date of Submission	Signature/Authenti cation	Yes	Date [indicated by the authorized representative] that the form was submitted to CFTC		cftcBatch/cftcForm102@submi tDate

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Data Dictionary for Form 71 – Identification of omnibus accounts and sub-accounts²⁰

	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
1.	Form Number		Yes		71	cftcBatch/cftcForm71@formN umber
2.	Acknowledge ment of Definitions Indicator	Acknowledgement of Definitions	Yes	Indicates whether the submitter acknowledged reading a list of terms used in the form	Y = Yes N = No	cftcBatch/cftcForm71@ackno wledgeDefinitions
3.	New/Modified /Correction Indicator		Yes	Indicates whether the omnibus account is: • New and being reported for the first time on a Form 71	N = new M = modified C = corrected	cftcBatch/cftcForm71@inform ationType

²⁰ When reviewing the data elements in this Technical Document, reporting parties should also review and consult the OCR Final Rule, including the requirements of the reporting forms attached as an appendix thereto. The reporting forms are the basis for these data elements. Reporting parties should visit this link to view the OCR Final Rule on the Federal Register: https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71

 $Visit\ this\ link\ to\ view\ a\ pdf\ copy\ of\ the\ OCR\ Final\ Rule:\ http://www.cftc.gov/ucm/groups/public/@lrfederalregister/documents/file/2013-26789a.pdf$

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				 Modified - previously reported on a Form 71 and being resubmitted because something has changed Corrected - being reported in order to correct previously-submitted erroneous data 		
4.	Account Number ²¹	Section A	Yes	Account number of the omnibus volume threshold		cftcBatch/cftcForm71@accoun tNumber

²¹ For all fields in section A and B of Form 71 that are marked as auto-populated in the reporting forms that appear as an appendix to the OCR Final Rule, the CFTC will provide these fields to FTP-based reporting parties in an email or other transmission. Reporting parties should incorporate these fields in their FTP submission.

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction account (from Form 102B) or omnibus reportable sub- account (from Form 71) as identified on the	Valid Values	XML
5.	Form Type Origination	Section A	Yes	referenced forms Form type of the form which identified the omnibus volume threshold account (Form 102B) or omnibus reportable subaccount (Form 71)	102B = Form 102B 71 = Form 71	cftcBatch/cftcForm71@origina IFormNumber
6.	Name of Identifying Entity	Section A	Yes	Name of the clearing member (if Form 102B) or preceding originator (if Form 71) that identified the omnibus volume threshold account or omnibus reportable subaccount,		

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction respectively	Valid Values	XML
				respectively		
7.	Reporting Market	Section A	Yes	The reporting contract market on which the identified account is traded		cftcBatch/cftcForm71@market Id
8.	Entity Type Indicator	Section A	Yes		LE=Legal Entity	cftcBatch/cftcForm71@entityT ype
9.	Name of Originator	Section A	Yes			cftcBatch/cftcForm71@legalEn tityName
10.	Originator Street Address	Section A	Yes	Street Address of the omnibus account originator as indicated on the Form 102B or Form 71		cftcBatch/cftcForm71@street
11.	Originator Suite	Section A	Conditional. Required if information available			cftcBatch/cftcForm71@suite
12.	Originator City	Section A	Yes	City of the omnibus account originator as indicated on the Form 102B or Form 71		cftcBatch/cftcForm71@city

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
13.	Originator State	Section A	Yes	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters as indicated on the Form 102B or Form 71		cftcBatch/cftcForm71@state
14.	Originator Country	Section A	Yes	ISO 3166-1 alpha-2 country code as indicated on the Form 102B or Form 71		cftcBatch/cftcForm71@countr y
15.	Originator Zip/Postal Code	Section A	Yes	Zip Code or Postal Code of the omnibus account originator as indicated on the Form 102B or Form 71		cftcBatch/cftcForm71@postal Code
16.	Originator Phone Number	Section A	Yes	Phone Number of the omnibus account originator as indicated on the Form 102B or Form 71		cftcBatch/cftcForm71@teleph one
17.	Originator Contact Last Name	Section A	Yes	Contact surname for the omnibus account originator		cftcBatch/cftcForm71/contact @lastName

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				as indicated on the Form 102B or Form 71		
18.	Originator Contact Middle Name	Section A	Conditional. Required if information available			cftcBatch/cftcForm71/contact @middleName
19.	Originator Contact First Name	Section A	Yes	Contact first in order name for the omnibus account originator as indicated on the Form 102B or Form 71		cftcBatch/cftcForm71/contact @firstName
20.	Originator Contact Suffix	Section A	Conditional. Required if information available			cftcBatch/cftcForm71/contact @nameSuffix
21.	Originator Contact Job Title	Section A	Yes	Job Title of the Contact for the omnibus account originator as indicated on the Form 102B or Form 71		cftcBatch/cftcForm71/contact @titleOrPosition
22.	Contact Relationship to Originator	Section A	Yes	Contact relationship to the originator		cftcBatch/cftcForm71/contact @relationship

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
23.	Originator Contact Phone Number	Section A	Yes	Phone Number of the Contact for the omnibus account originator as indicated on the Form 102B or Form 71		cftcBatch/cftcForm71/contact @telephone
24.	Originator Contact Email Address	Section A	Yes	Email Address of the Contact for the omnibus account originator as indicated on the Form 102B or Form 71		cftcBatch/cftcForm71/contact @email
25.	Originator Website	Section A	Conditional. Required if information available	URL of the website of the omnibus account originator		cftcBatch/cftcForm71 @website
26.	Originator NFA ID	Section A	Conditional. Required if information available	The identification number given to the originator by the National Futures Association		cftcBatch/cftcForm71@NFAIde ntifier
27.	Originator Legal Entity Identifier (LEI)	Section A	Conditional. Required if information available	The legal entity identifier (LEI) assigned to the originator by the LEI issuer		cftcBatch/cftcForm71 @legalEntityIdentifier

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
28.	Allocation of Trades Indicator	Section B – Question 1	Yes	Indicates if the originator allocated trades from the specified omnibus account on the specified date on the specified reporting market	Y = trades were allocated N = trades were not allocated	cftcBatch/cftcForm71 @tradesAllocated
29.	Sum of Allocations Reportable Trading Volume for Recipient Account Indicator	Section B – Question 2	Yes	For cases where trades were allocated, indicates whether the sum of allocations resulted in reportable trading volume for a recipient account on the specified date on the specified reporting market	Y = resulted in reportable trading volume N = did not result in reportable trading volume	cftcBatch/cftcForm71 @isReportable

REPORTABLE SUB-ACCOUNT OWNERSHIP AND CONTROL INFORMATION

OMNIBUS REPORTABLE SUB-ACCOUNT INFORMATION

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
30.	Reportable Sub-Account Number	Question 3	Conditional. Required if isReportable='Y' AND tradesAllocated='Y'			cftcBatch/cftcForm71/relatedA ccount@accountNumber
31.	Reportable Sub-Account Omnibus Account Indicator	Question 3ai	Conditional. Required if isReportable='Y' AND tradesAllocated='Y'	Is the Reportable Sub-Account an omnibus account	Y = Yes N = No	cftcBatch/cftcForm71/relatedA ccount@isOmnibus
32.	House or Customer Indicator	Question 3aii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus ='Y'	If the reported Reportable Sub- Account is being reported as an Omnibus Account indicate whether the Reportable Sub-Account Omnibus Account is a house or customer account of the reporting firm	H = House C = Customer	cftcBatch/ cftcForm71/relatedAccount@a ccountClass
33.	Reportable Sub-Account Omnibus Account	Question 3aii	Conditional. Required if isReportable='Y' AND	Indicates reporting Volume Threshold Account Omnibus Account orginiator	Y = Yes N = No	cftcBatch/ cftcForm71/relatedAccount/re latedEntity@isOriginator

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Originator Indicator		tradesAllocated='Y ' AND isOmnibus ='Y' THEN isOriginator = 'Y'			
34.	Reportable Sub-Account Omnibus Account Entity Type	Question 3aii	Yes		LE=Legal Entity	cftcBatch/ cftcForm71/relatedAccount/re latedEntity@entityType
35.	Reportable Sub-Account Omnibus Account Originator Name	Question 3aii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus ='Y'	Name of the reportable account Originator		cftcBatch/ cftcForm71/relatedAccount/re latedEntity@legalEntityName
36.	Reportable Sub-Account Omnibus Account Originator Street Address	Question 3aii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus ='Y'	Street address of the reportable account Originator		cftcBatch/ cftcForm71/relatedAccount/re latedEntity@street
37.	Reportable Sub-Account Omnibus Account Originator Suite	Question 3aii	Conditional. Required if information available AND isReportable='Y' AND			cftcBatch/ cftcForm71/relatedAccount/re latedEntity@suite

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			tradesAllocated='Y ' AND isOmnibus ='Y'			
38.	Reportable Sub-Account Omnibus Account Originator City	Question 3aii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus ='Y'	City of the reportable account Originator		cftcBatch/ cftcForm71/relatedAccount/re latedEntity@city
39.	Reportable Sub-Account Omnibus Account Originator State	Question 3aii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus ='Y'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/ cftcForm71/relatedAccount/re latedEntity@state
40.	Reportable Sub-Account Omnibus Account Originator Country	Question 3aii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus ='Y'	ISO 3166-1 alpha-2 country code		cftcBatch/ cftcForm71/relatedAccount/re latedEntity@country
41.	Reportable Sub-Account Omnibus Account Originator	Question 3aii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y	Zip/Postal code of the reportable account Originator		cftcBatch/ cftcForm71/relatedAccount/re latedEntity@postalCode

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Zip/Postal Code		' AND isOmnibus ='Y'			
42.	Reportable Sub-Account Omnibus Account Originator Phone Number	Question 3aii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus ='Y'	Phone Number of the reportable account Originator		cftcBatch/ cftcForm71/relatedAccount/re latedEntity@telephone
43.	Reportable Sub-Account Omnibus Account Originator Contact Last Name	Question 3aii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus ='Y' AND entityType='LE'	Surname of the contact person for the Originator		cftcBatch/ cftcForm71/relatedAccount/re latedEntity/contact@lastName
44.	Reportable Sub-Account Omnibus Account Originator Contact First Name	Question 3aii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus ='Y' AND entityType='LE'	First name of the contact person for the Originator		cftcBatch/ cftcForm71/relatedAccount/re latedEntity/contact@firstNam e
45.	Reportable Sub-Account Omnibus	Question 3aii	Conditional. Required if information	Middle name of the contact person for the Originator		cftcBatch/ cftcForm71/relatedAccount/re latedEntity/contact@middleNa

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Account Contact Middle Name		available AND isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus ='Y' AND entityType='LE'			me
46.	Reportable Sub-Account Omnibus Account Contact Suffix	Question 3aii	Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus ='Y' AND entityType='LE'	Suffix of the contact person for the Originator		cftcBatch/cftcForm102/related Account/relatedEntity/contact @nameSuffix
47.	Reportable Sub-Account Omnibus Account Originator Contact Job Title	Question 3aii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus ='Y' AND entityType='LE'	Job title of the contact person for the Originator entity		cftcBatch/cftcForm102/related Account/relatedEntity/contact @titleOrPosition
48.	Contact Relationship to Reportable Sub-Account	Question 3aii	Conditional. Required if isReportable='Y' AND	Contact relationship to the Originator entity		cftcBatch/ cftcForm71/relatedAccount/re latedEntity/contact@relations hip

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Omnibus Account Originator		tradesAllocated='Y ' AND isOmnibus ='Y' AND entityType='LE'			
49.	Reportable Sub-Account Omnibus Account Originator Contact Phone Number	Question 3aii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus ='Y' AND entityType='LE'	Phone number of the contact person for the Originator entity		cftcBatch/ cftcForm71/relatedAccount/re latedEntity/contact@telephon e
50.	Reportable Sub-Account Omnibus Account Originator Contact Email Address	Question 3aii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus ='Y' AND entityType='LE'	Email address of the contact person for the Originator entity		cftcBatch/ cftcForm71/relatedAccount/re latedEntity/contact@email
51.	Reportable Sub-Account Omnibus Account Originator Website	Question 3aii	Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus	URL of the Originator's website		cftcBatch/ cftcForm71/relatedAccount/re latedEntity@website

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML		
			='Y' AND entityType='LE'					
52.	Reportable Sub-Account Omnibus Account Originator NFA ID	Question 3aii	Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus ='Y'	The identification number given to the Originator entity by the National Futures Association		cftcBatch/ cftcForm71/relatedAccount/re latedEntity@NFAIdentifier		
53.	Reportable Sub-Account Omnibus Account Originator Legal Entity Identifier (LEI)	Question 3aii	Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus ='Y'	The legal entity identifier (LEI) assigned to the Originator entity by the LEI issuer		cftcBatch/ cftcForm71/relatedAccount/re latedEntity@legalEntityIdentifi er		
NON-	NON-OMNIBUS REPORTABLE SUB-ACCOUNT OWNER(S)							
54.	Reportable Sub-Account Owner Indicator	Question 3bi	Conditional. Required if isReportable='Y' AND	Indicates reporting Reportable Sub- Account account owner	Y = Yes N = No	cftcBatch/ cftcForm71/ relatedAccount/relatedEntity @isOwner		

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		Question Number		Description, Purpose or Instruction		XML
			tradesAllocated='Y ' AND isOmnibus='N' THEN isOwner='Y'			
55.	Reportable Sub-Account Owner Type Indicator	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y'	Indicates whether the Reportable Sub-Account owner is a legal entity or natural person	LE = Legal Entity NP = Natural Person	cftcBatch/ cftcForm71/ relatedAccount/relatedEntity @entityType
IF REI	PORTABLE SUI	B-ACCOUNT OWNER	IS A LEGAL ENTITY			
56.	Reportable Sub-Account Owner Legal Entity Name	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE'	Legal or registered name of the reportable sub- account owner		cftcBatch/ cftcForm71/ relatedAccount/relatedEntity @legalEntityName

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
57.	Reportable Sub-Account Owner Last Name	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP'	Surname of the natural person reportable subaccount owner		cftcBatch/ cftcForm71/ relatedAccount/relatedEntity @lastName
58.	Reportable Sub-Account Owner First Name	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP'	Given or first in order name of the natural person reportable sub- account owner		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @firstName
59.	Reportable Sub-Account Owner Middle Name	Question 3bi	Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' ' AND	Middle name of the natural person reportable sub- account owner		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @middleName

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			isOmnibus='N' AND isOwner='Y' AND entityType='NP'			
60.	Reportable Sub-Account Owner Suffix	Question 3bi	Conditional. Required if information available ANDisReportable=' Y' AND tradesAllocated='Y ' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP'	Suffix of the natural person reportable subaccount owner		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @nameSuffix
FOR	BOTH LEGAL EI	NTITIES AND NATUR	AL PERSONS			
61.	Reportable Sub-Account Owner Street Address	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y'	Street address of the reportable sub-account owner		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @street
62.	Reportable Sub-Account Owner Suite	Question 3bi	Conditional. Required if information	Suite of the reportable sub-account owner		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @suite

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			available ANDisReportable=' Y' AND tradesAllocated='Y ' AND isOmnibus='N' AND isOwner='Y'			
63.	Reportable Sub-Account Owner City	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y'	City of the reportable sub-account owner		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @city
64.	Reportable Sub-Account Owner State	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @state
65.	Reportable Sub-Account Owner Country	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y ' AND	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @country

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			isOmnibus='N' AND isOwner='Y'			
66.	Reportable Sub-Account Owner Zip/Postal Code	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y'	Zip/Postal code of the reportable sub-account owner		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @postalCode
67.	Reportable Sub-Account Owner Phone Number	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y'	Phone Number of the reportable sub-account owner		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @telephone
IF RE	PORTABLE SUE	B-ACCOUNT OWNER	IS A NATURAL PERS	SON		
68.	Reportable Sub-Account Owner Email Address	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N'	Email address of the reportable sub-account owner		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @email

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND isOwner='Y'			
IF RE	PORTABLE SUB	B-ACCOUNT OWNER	IS A LEGAL ENTITY			
69.	Reportable Sub-Account Owner Contact Last Name	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE'	Surname of the contact person for the owner		cftcBatch/cftcForm71/ relatedAccount/relatedEntity/ contact@lastName
70.	Reportable Sub-Account Owner Contact First Name	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE'	First name of the contact person for the owner		cftcBatch/cftcForm71/ relatedAccount/relatedEntity/ contact@firstName
71.	Reportable Sub-Account Owner Contact	Question 3bi	Conditional. Required if information available AND	Middle name of the contact person for the owner		cftcBatch/cftcForm71/ relatedAccount/relatedEntity/ contact@middleName

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Middle Name		isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE'			
72.	Reportable Sub-Account Owner Contact Suffix	Question 3bi	Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE'	Suffix of the contact person for the owner		cftcBatch/cftcForm71/ relatedAccount/relatedEntity/ contact@nameSuffix
73.	Reportable Sub-Account Owner Contact Job Title	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y' AND	Job title of the contact person for the ownership entity		cftcBatch/cftcForm71/ relatedAccount/relatedEntity/ contact@titleOrPosition

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			entityType='LE'			
74.	Contact Relationship to Reportable Sub-Account Owner	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE'	Contact relationship to the ownership entity		cftcBatch/cftcForm71/ relatedAccount/relatedEntity/ contact@relationship
75.	Reportable Sub-Account Owner Contact Phone Number	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE'	Phone number of the contact person for the ownership entity		cftcBatch/cftcForm71/ relatedAccount/relatedEntity/ contact@telephone
76.	Reportable Sub-Account Owner Contact Email Address	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N'	Email address of the contact person for the ownership entity		cftcBatch/cftcForm71/ relatedAccount/relatedEntity/ contact@email

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND isOwner='Y' AND entityType='LE'			
77.	Reportable Sub-Account Owner Website	Question 3bi	Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE'	URL of the owner's website		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @website
78.	Reportable Sub-Account Owner NFA ID	Question 3bi	Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y'	The identification number given to the ownership entity by the National Futures Association		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @NFAIdentifier
79.	Reportable Sub-Account Owner Legal Entity	Question 3bi	Conditional. Required if information available AND	The legal entity identifier (LEI) assigned to the ownership entity		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @legalEntityIdentifier

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Identifier (LEI)		isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y'	by the LEI issuer		
NON-	OMNIBUS REPO	ORTABLE SUB-ACCO	UNT CONTROLLER(S)		
80.	Reportable Sub-Account Controller Indicator	Question 3bii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' THEN isController='Y'	Indicates reportable sub- account controller	Y = Yes N = No	cftcBatch/cftcForm71/ relatedAccount/relatedEntity @isController
81.	Reportable Sub-Account Controller Entity Type	Question 3bii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isController='Y' THEN entityType='NP'	Reportable sub- account controller entity type	NP = Natural Person	cftcBatch/cftcForm71/ relatedAccount/relatedEntity @entityType

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
82.	Reportable Sub-Account Controller Natural Person Last Name	Question 3bii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isController='Y'	Surname of the natural person reportable subaccount Controller		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @lastName
83.	Reportable Sub-Account Controller Natural Person First Name	Question 3bii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isController='Y'	Given or first in order name of the natural person reportable sub- account Controller		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @firstName
84.	Reportable Sub-Account Controller Natural Person Middle Name	Question 3bii	Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND	Middle name of the natural person reportable sub- account Controller		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @middleName

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			isController='Y'			
85.	Reportable Sub-Account Controller Natural Person Suffix	Question 3bii	Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isController='Y'	Suffix of the natural person reportable sub- account Controller		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @nameSuffix
86.	Reportable Sub-Account Controller Street Address	Question 3bii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isController='Y'	Street address of the reportable sub-account Controller		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @street
87.	Reportable Sub-Account Controller Suite	Question 3bii	Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y	Suite of the reportable sub-account Controller		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @suite

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			' AND isOmnibus='N' AND isController='Y'			
88.	Reportable Sub-Account Controller City	Question 3bii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isController='Y'	City of the reportable sub-account Controller		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @city
89.	Reportable Sub-Account Controller State	Question 3bii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isController='Y'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @state
90.	Reportable Sub-Account Controller Country	Question 3bii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @country

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND isController='Y'			
91.	Reportable Sub-Account Controller Zip/Postal Code	Question 3bii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isController='Y'	Zip/Postal code of the reportable sub-account Controller		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @postalCode
92.	Reportable Sub-Account Controller Phone Number	Question 3bii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isController='Y'	Phone Number of the reportable sub-account Controller		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @telephone
93.	Reportable Sub-Account Controller Name of Employer	Question 3bii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isController='Y'			cftcBatch/cftcForm71/ relatedAccount/relatedEntity @employerName

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
94.	Reportable Sub-Account Controller Job Title	Question 3bii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isController='Y'	Job title of the contact person for the Controller entity		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @titleOrPosition
95.	Relationship to Reportable Sub-Account Owner	Question 3bii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isController='Y'	Contact relationship to the Owner entity		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @relationship
96.	Reportable Sub-Account Controller Email Address	Question 3bii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isController='Y'	Email address of the reportable sub-account Controller		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @email
97.	Reportable Sub-Account	Question 3bii	Conditional. Required if	The identification number given to		cftcBatch/cftcForm71/ relatedAccount/relatedEntity

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Controller NFA ID		information available AND isReportable='Y' AND tradesAllocated='Y' 'AND isOmnibus='N' AND isController='Y'	the Controller entity by the National Futures Association		@NFAIdentifier
98.	Originator Authorization Indicator	Section C	Yes	Indicates if the submitter is duly authorized by the relevant originator (as specified on the Form 102B or Form 71), to provide the information and representations submitted on this Form 71, and that information and representations are true and correct	Y = authorized N = not authorized	cftcBatch/cftcForm71/contact @isAuthorizedRep
99.	Authorized Representativ e Last Name	Section C	Yes	Surname of the authorized representative		cftcBatch/cftcForm71/contact @lastName

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	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
100.	Authorized Representativ e First Name	Section C	Yes	Given or first in order name of the authorized representative		cftcBatch/cftcForm71/contact @firstName
101.	Authorized Representativ e Middle Name	Section C	Yes	Middle name of the authorized representative		cftcBatch/cftcForm71/contact @middleName
102.	Authorized Representativ e Name Suffix	Section C	Yes	Generation or name suffix of the authorized representative		cftcBatch/cftcForm71/contact @nameSuffix
103.	Authorized Representativ e Position	Section C	Yes	Job position of the authorized representative		cftcBatch/cftcForm71/contact @titleOrPosition
104.	Date of Submission	Section C	Yes	Date [indicated by the authorized representative] that the form was submitted to CFTC		cftcBatch/cftcForm71@submit Date

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Data Dictionary for Form 40 – Statement of reporting trader²²

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
1.	Form Number		Yes		40	cftcBatch/cftcForm40@formN umber
2.	Acknowledge ment of Definitions Indicator	Section – Acknowledgement of Definitions	Yes	Indicates whether the submitter acknowledged reading a list of terms used in the form	Y = Yes N = No	cftcBatch/cftcForm40@ackno wledgeDefinitions
3.	New/Modified /Correction Indicator		Yes	Indicates whether the reportable trader is: • New and being reported for the first time on a Form 40	N = New M = Modified C = Corrected	cftcBatch/cftcForm40@inform ationType

When reviewing the data elements in this Technical Document, reporting parties should also review and consult the OCR Final Rule, including the requirements of the reporting forms attached as an appendix thereto. The reporting forms are the basis for these data elements. Reporting parties should visit this link to view the OCR Final Rule on the Federal Register: https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71

 $Visit\ this\ link\ to\ view\ a\ pdf\ copy\ of\ the\ OCR\ Final\ Rule:\ http://www.cftc.gov/ucm/groups/public/@lrfederalregister/documents/file/2013-26789a.pdf$

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				 Modified - previously reported on a Form 40 and being resubmitted because something has changed Corrected - being reported in order to correct previously -submitted erroneous data 		
REPO	ORTING TRADE	R CONTACT INFORM	ATION			
4.	Trader Type Indicator	Question 1	Yes	Indicates whether the reporting trader is a legal entity or natural person	LE = Legal Entity NP = Natural Person	cftcBatch/cftcForm40@entityT ype

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
IF RI	EPORTING TRAI	DER IS A LEGAL E	NTITY			
5.	Legal Entity Name of Reporting Trader	Question 1	Conditional. Required if entityType = 'LE'	The legal name of the reporting trader (if legal entity).		cftcBatch/cftcForm40@legalEn tityName
IF RI	EPORTING TRAI	DER IS A NATURA	AL PERSON			
6.	Last Name of Reporting Trader	Question 1	Conditional. Required if entityType = 'NP'	Surname of the reporting trader		cftcBatch/cftcForm40@lastNa me
7.	First Name of Reporting Trader	Question 1	Conditional. Required if entityType = 'NP'	Given or first in order name of the reporting trader		cftcBatch/cftcForm40@firstNa me
8.	Middle Name of Reporting Trader	Question 1	Conditional. Required if information available AND entityType = 'NP'	Middle name of the reporting trader		cftcBatch/cftcForm40@middle Name
9.	Name Suffix of the Reporting Trader	Question 1	Conditional. Required if information available AND entityType = 'NP'	Generational or name suffix of the reporting trader		cftcBatch/cftcForm40@nameS uffix
FOR	BOTH LEGAL EN	NTITIES AND NAT	TURAL PERSONS			
10.	Street Address of	Question 1	Yes	The street address of the reporting		cftcBatch/cftcForm40@street

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Reporting Trader			trader		
11.	Suite Number of Reporting Trader	Question 1	Conditional. Required if information available	The suite number of the reporting trader		cftcBatch/cftcForm40@suite
12.	City of Reporting Trader	Question 1	Yes	The city of the reporting trader		cftcBatch/cftcForm40@city
13.	State of Reporting Trader	Question 1	Yes	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm40@state
14.	Country of Reporting Trader	Question 1	Yes	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm40@countr y
15.	Zip/Postal Code of Reporting Trader	Question 1	Yes	The zip code or postal code of the reporting trader		cftcBatch/cftcForm40@postal Code
16.	Phone Number of Reporting Trader	Question 1	Yes	The phone number of the reporting trader		cftcBatch/cftcForm40@teleph one
17.	Email Address of Reporting Trader	Question 1	Yes	The email address of the reporting trader		cftcBatch/cftcForm40@email

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
18.	Website of Reporting Trader	Question 1	Conditional. Required if information available	The website of the reporting trader		cftcBatch/cftcForm40@websit e
19.	NFA ID of Reporting Trader	Question 1	Conditional. Required if information available	The identification number given to the reporting trader by the National Futures Association		cftcBatch/cftcForm40@NFAIde ndtifier
20.	Legal Entity Identifier of Reporting Trader	Question 1	Conditional. Required if information available	The legal entity identifier (LEI) assigned to the reporting trader by the LEI issuer		cftcBatch/cftcForm40@legalEn tityIdentifier
21.	Name of Reporting Trader's Employer	Question 1	Yes	The name of the trader's employer		cftcBatch/cftcForm40@emplo yerName
22.	Reporting Trader's Employer's NFA ID	Question 1	Conditional. Required if information available	The identification number given to the reporting trader's employer by the National Futures Association		cftcBatch/cftcForm40@emplo yerNFAldentifier
23.	Reporting Trader's Employer's	Question 1	Conditional. Required if information	The legal entity identifier (LEI) assigned to the		cftcBatch/cftcForm40@emplo yerLEI

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	Data Element Legal Entity Identifier	Form 40 Question Number	Required available	CFTC Description, Purpose or Instruction reporting trader's employer by the LEI issuer	Valid Values	XML
CONT	CACT INFORMAT	ΓΙΟΝ – DERIVATIVES	S TRADING CONTAC			
24.	Contact for Derivatives Trading of Reporting Trader	Question 2	Yes	Indicates whether the contact information is regarding the derivatives trading of the reporting traders	Y = Yes N = No	cftcBatch/CftcForm40/contact @isDerivativesPOC
25.	Individual to Contact Regarding Derivatives Trading has same information as Reporting Trader	Question 2	Yes	Indicates whether the contact information for derivatives trading is the same as the reporting trader	Y = Yes N = No	cftcBatch/CftcForm40/contact @isSameAsReporter
26.	Last Name of Contact for Reporting Trader's Derivatives Trading	Question 2	Yes	Surname of the contact person for the reporting trader's derivatives trading		cftcBatch/cftcForm40/contact @lastName

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
27.	First Name of Contact for Reporting Trader's Derivatives Trading	Question 2	Yes	Given or first in order name of the contact person for the reporting trader's derivatives trading		cftcBatch/cftcForm40/contact @firstName
28.	Middle Name of Contact for Reporting Trader's Derivatives Trading	Question 2	Conditional. Required if information available	Middle name of the contact person for the reporting trader's derivatives trading		cftcBatch/cftcForm40/contact @middleName
29.	Name Suffix of Contact for Reporting Trader's Derivatives Trading	Question 2	Conditional. Required if information available	Suffix of the contact person for the reporting trader's derivatives trading		cftcBatch/cftcForm40/contact @nameSuffix
30.	Street Address of Contact for Reporting Trader's Derivatives Trading	Question 2	Yes	Street Address of the contact person for the reporting trader's derivatives trading		cftcBatch/cftcForm40/contact @street
31.	Suite Number of Contact for Reporting Trader's	Question 2	Conditional. Required if information available	Suite number of the contact person for the reporting trader's		cftcBatch/cftcForm40/contact @suite

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Derivatives Trading			derivatives trading		
32.	City of Contact for Reporting Trader's Derivatives Trading	Question 2	Yes	City of the contact person for the reporting trader's derivatives trading		cftcBatch/cftcForm40/contact @city
33.	State of Contact for Reporting Trader's Derivatives Trading	Question 2	Yes	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm40/contact @state
34.	Country of Contact for Reporting Trader's Derivatives Trading	Question 2	Yes	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm40/contact @country
35.	Zip/Postal Code of Contact for Reporting Trader's Derivatives Trading	Question 2	Yes	Zip Code or postal code of the contact person for the reporting trader's derivatives trading		cftcBatch/cftcForm40/contact @postalCode

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
36.	Phone Number of Contact for Reporting Trader's Derivatives Trading	Question 2	Yes	Phone Number of the contact person for the reporting trader's derivatives trading		cftcBatch/cftcForm40/contact @telephone
37.	Email Address of Contact for Reporting Trader's Derivatives Trading	Question 2	Yes	Email Address of the contact person for the reporting trader's derivatives trading		cftcBatch/cftcForm40/contact @email
38.	NFA ID of Contact for Reporting Trader's Derivatives Trading	Question 2	Conditional. Required if information available	The identification number given to the contact by the National Futures Association		cftcBatch/cftcForm40/contact @NFAIdentifier
CONT	TACT INFORMA	ΓΙΟΝ - RISK MANAGI	EMENT OPERATION	S CONTACT PERSO	N	
39.	Contact for Risk Management Operations of Reporting Trader	Question 3	Yes	Indicates whether the contact information is regarding the Risk Management Operations of the reporting traders	Y = Yes N = No	cftcBatch/CftcForm40/contact @isRiskManagementPOC

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
40.	Individual to Contact Regarding Risk Management Operations has same information as Reporting Trader	Question 3	Yes	Indicates whether the contact information for risk management operations is the same as the reporting trader	Y = Yes N = No	cftcBatch/CftcForm40/contact @isSameAsReporter
41.	Last Name of Contact for Reporting Trader's Risk Management Operations	Question 3	Yes	Surname for reportable contact person		cftcBatch/cftcForm40/contact @lastName
42.	First Name of Contact for Reporting Trader's Risk Management Operations	Question 3	Yes	Given or first in order name for reportable contact person		cftcBatch/cftcForm40/contact @firstName
43.	Middle Name of Contact for Reporting Trader's Risk Management Operations	Question 3	Conditional. Required if information available	Middle name for reportable contact person		cftcBatch/cftcForm40/contact @middleName
44.	Name Suffix of Contact for	Question 3	Conditional. Required if	Suffix for reportable contact		cftcBatch/cftcForm40/contact @nameSuffix

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Reporting Trader's Derivatives Trading		information available	person		
45.	Street Address of Contact for Reporting Trader's Risk Management Operations	Question 3	Yes	Street Address for reportable contact person		cftcBatch/cftcForm40/contact @street
46.	Suite Number of Contact for Reporting Trader's Risk Management Operations	Question 3	Conditional. Required if information available	Suite number for reportable contact person		cftcBatch/cftcForm40/contact @suite
47.	City of Contact for Reporting Trader's Risk Management Operations	Question 3	Yes	City for a reportable contact person		cftcBatch/cftcForm40/contact @city
48.	State of Contact for Reporting Trader's Risk Management Operations	Question 3	Yes	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm40/contact @state

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
49.	Country of Contact for Reporting Trader's Risk Management Operations	Question 3	Yes	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm40/contact @country
50.	Zip/Postal Code of Contact for Reporting Trader's Risk Management Operations	Question 3	Yes	Zip Code or postal code for reportable contact person		cftcBatch/cftcForm40/contact @postalCode
51.	Phone Number of Contact for Reporting Trader's Risk Management Operations	Question 3	Yes	Phone Number for reportable contact person		cftcBatch/cftcForm40/contact @telephone
52.	Email Address of Contact for Reporting Trader's Risk Management Operations	Question 3	Yes	Email Address for reportable contact person		cftcBatch/cftcForm40/contact @email
53.	NFA ID of Contact for Reporting	Question 3	Conditional. Required if information	The identification number given to the contact by the		cftcBatch/cftcForm40/contact @NFAIdentifier

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Trader's Risk Management Operations		available	National Futures Association		
CONT	CACT INFORMAT	FION - INDIVIDUAL	RESPONSIBLE FOR 1	INFORMATION ON I	FORM 40	
54.	Contact for Responsible Individual of Information on Form 40.	Question 4	Yes	Indicates whther the contact information is regarding the Individual Responsible for information on form40	Y = Yes N = No	cftcBatch/CftcForm40/contact @isFormInformationPOC
55.	Individual to Contact Regarding Information on Form 40 has same information as Reporting Trader	Question 4	Yes	Indicates whether the contact information for information on Form 40 is the same as the reporting trader	Y = Yes N = No	cftcBatch/CftcForm40/contact @isSameAsReporter
56.	Last Name of Contact for Reporting Trader's Form 40 Verification	Question 4	Yes	Surname for a natural person contact for Form 40 verification for the reporting trader		cftcBatch/cftcForm40/contact @lastName

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
57.	First Name of Contact for Reporting Trader's Form 40 Verification	Question 4	Yes	Given or first in order name for a natural person contact for Form 40 verification for the reporting trader		cftcBatch/cftcForm40/contact @firstName
58.	Middle Name of Contact for Reporting Trader's Form 40 Verification	Question 4	Conditional. Required if information available	Middle name for a natural person contact for Form 40 verification for the reporting trader		cftcBatch/cftcForm40/contact @middleName
59.	Name Suffix of Contact for Reporting Trader's Form 40 Verification	Question 4	Conditional. Required if information available	Suffix for a natural person contact for Form 40 verification for the reporting trader		cftcBatch/cftcForm40/contact @nameSuffix
60.	Street Address of Contact for Reporting Trader's Form 40 Verification	Question 4	Yes	Street Address of the natural person contact for the reporting trader's Form 40 verification		cftcBatch/cftcForm40/contact @street
61.	Suite Number of Contact for Reporting Trader's Form 40 Verification	Question 4	Conditional. Required if information available	Suite number of the natural person contact for the reporting trader's Form 40		cftcBatch/cftcForm40/contact @suite

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				verification		
62.	City of Contact for Reporting Trader's Form 40 Verification	Question 4	Yes	City of the natural person contact for the reporting trader's Form 40 verification		cftcBatch/cftcForm40/contact @city
63.	State of Contact for Reporting Trader's Form 40 Verification	Question 4	Yes	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm40/contact @state
64.	Country of Contact for Reporting Trader's Form 40 Verification	Question 4	Yes	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm40/cotnact @country
65.	Zip/Postal Code of Contact for Reporting Trader's Form 40 Verification	Question 4	Yes	Zip code or postal code of the natural person contact for the reporting trader's Form 40 verification		cftcBatch/cftcForm40/contact @postalCode
66.	Phone Number of Contact for Reporting	Question 4	Yes	Phone number of the natural person contact for the reporting trader's		cftcBatch/cftcForm40/contact @telephone

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Trader's Form 40 Verification			Form 40 verification		
67.	Email Address of Contact for Reporting Trader's Form 40 Verification	Question 4	Yes	Email Address of the natural person contact for the reporting trader's Form 40 verification		cftcBatch/cftcForm40/contact @email
68.	NFA ID of Contact for Reporting Trader's Form 40 Verification	Question 4 CARRIER INFORMA	Conditional. Required if information available	The identification number given to the contact by the National Futures Association		cftcBatch/cftcForm40/contact @NFAIdentifier
OMIN	IDOS ACCOUNT	CARRIER INFORMA	HON			
69.	Customer Omnibus Account Indicator	Question 5	Yes	Indicates whether the reporting trader has a customer omnibus account with a futures commission merchant, clearing member, or foreign broker	Y = Yes N = No	cftcBatch/cftcForm40@isOmni busAccount
70.	Name of Omnibus Account	Question 5	Conditional. Required if isOmnibusAccount	For traders that have a customer omnibus		cftcBatch/cftcForm40/omnibus AccountCarrier@legalEntityNa me

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Carrier		='Y'	account(s), the name of the futures commission merchant, clearing member, or foreign broker carrying the account(s) of the reporting trader		
71.	Futures Commission Merchant Omnibus Carrier Indicator	Question 5	Conditional. Required if isOmnibusAccount ='Y'	Indicates whether the reporting trader has a customer omnibus account with a futures commission merchant	Y = Yes N = No	cftcBatch/cftcForm40/omnibus AccountCarrier@isFCM
72.	Clearing Member Omnibus Carrier Indicator	Question 5	Conditional. Required if isOmnibusAccount ='Y'	Indicates whether the reporting trader has a customer omnibus account with a clearing member	Y = Yes N = No	cftcBatch/cftcForm40/omnibus AccountCarrier@isCM
73.	Foreign Broker Omnibus Carrier Indicator	Question 5	Conditional. Required if isOmnibusAccount ='Y'	Indicates whether the reporting trader has a customer omnibus account with a	Y = Yes N = No	cftcBatch/cftcForm40/omnibus AccountCarrier@isFB

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				foreign broker		
74.	Foreign Government Affiliation Indicator	Question 6	Yes	Indicates whether the reporting trader is directly or indirectly affiliated with a government other than that of the United States	Y = Yes N = No	cftcBatch/cftcForm40@isForie gnAffiliated
FORE	EIGN GOVERNM	ENT AFFILIATION	INFORMATION			
75.	Foreign Government Name	Question 6	Conditional. Required if isForiegnAffiliated ='Y'	For reporting traders affiliated with foreign government(s), the name(s) of those foreign governments		cftcBatch/cftcForm40/foreignA ffiliation@countryName
76.	Nature of	Question 6	Conditional. Required if	An explanation of the nature of		cftcBatch/cftcForm40/foreignA ffiliation@relationship

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
77.	Non-Domestic Entity Indicator	Question 7	Conditional. Required if entityType ='LE'	Indicates if the reporting trader is organized under the laws of countr(ies) other than the United States	Y = yes N = no	cftcBatch/cftcForm40@isForie gnEntity
78.	Country of Organization	Question 7	Conditional. Required if isForiegnEntity ='Y'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm40/foregnL egalRegime@country
		TURE OF REPORTING		RADER		
79.	Parent or Owner Indicator	Question 8	Yes, isParentOrOwner= 'Y'	Indicates whether the reporting trader has at least one parent/owner	Y = Has at least one parent or owner	cftcBatch/cftcForm40/relatedE ntity@isParentOrOwner
80.	Parent Company	Question 8	Conditional. Required if isParentOrOwner ='Y'	Indicates if the parent of the reporting trader is a Parent Company	Y = yes N = no	cftcBatch/cftcForm40/relatedE ntity@isParentCompany
81.	Parent Generation	Question 8	Conditional. Required if isParentOrOwner= 'Y' AND isParentCompany=	For each parent of the reporting trader, indicates the hierarchical level in the entity	2 = Parent of a parent 1 = Direct parent of a reporting trader	cftcBatch/cftcForm40/relatedE ntity@generation

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			Υ	structure where the parent is located. Direct parents of the trader have Generation = 1; parents of a Generation +1 parent (parents of a direct parent) have Generation = 2 and so on.		
82. IF PA	Parent or Owner Entity Type RENT/OWNER	Question 8 IS A LEGAL ENTITY	Conditional. Required if isParentOrOwner= 'Y'	Indicates whether the parent/owner is a legal entity or a natural person	LE = legal entity NP = natural person	cftcBatch/cftcForm40/relatedE ntity@entityType
	, -					
83.	Parent or Owner Legal Entity Name	Question 8	Conditional. Required if entityType = 'LE' AND isParentOrOwner ='Y'	The legal entity name of each parent/owner of the reporting trader (if the parent is a legal entity)		cftcBatch/cftcForm40/relatedE ntity@legalEntityName
IF PA	RENT/OWNER	IS A NATURAL PERS	ON			

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
84.	Parent or Owner Last Name	Question 8	Conditional. Required if entityType = 'NP' AND isParentOrOwner ='Y'	Surname of the parent/owner of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@lastName
85.	Parent or Owner First Name	Question 8	Conditional. Required if entityType = 'NP' AND isParentOrOwner ='Y'	Given or first in order name of the parent/owner of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@firstName
86.	Parent or Owner Middle Name	Question 8	Conditional. Required if information available AND If entitytype = 'NP' AND isParentOrOwner ='Y'	Middle name of the parent/owner of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@middleName
87.	Parent or Owner Name Suffix	Question 8	Conditional. Required if information availableAND If entitytype = 'NP' AND isParentOrOwner ='Y'	Generational or name suffix of the parent/owner of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@nameSuffix

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
FOR	BOTH LEGAL EN	ITITIES AND NATUR	AL PERSONS			
88.	Parent or Owner Street Address	Question 8	Conditional. Required if isParentOrOwner ='Y'	Street address of each parent/owner of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@street
89.	Parent or Owner Suite Number	Question 8	Conditional. Required if information available AND isParentOrOwner ='Y'	Suite number of each parent/owner of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@suite
90.	Parent or Owner City	Question 8	Conditional. Required if isParentOrOwner ='Y'	City of each parent/owner of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@city
91.	Parent or Owner State	Question 8	Conditional. Required if isParentOrOwner ='Y'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm40/relatedE ntity@state
92.	Parent or Owner Country	Question 8	Conditional. Required if isParentOrOwner ='Y'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm40/relatedE ntity@country
93.	Parent or Owner	Question 8	Conditional. Required if	Zip code or postal code of each		cftcBatch/cftcForm40/relatedE ntity@postalCode

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Zip/Postal Code		isParentOrOwner ='Y'	parent/owner of the reporting trader		
94.	Parent or Owner Phone Number	Question 8	Conditional. Required if isParentOrOwner ='Y'	Phone Number of each parent/owner of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@telephone
95.	Parent or Owner Website	Question 8	Conditional. Required if information available	Website of each parent/owner of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@website
96.	Parent or Owner Email Address	Question 8	Conditional. Required if isParentOrOwner ='Y'	Email address of each parent/owner of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@email
97.	Parent or Owner NFA ID	Question 8	Conditional. Required if information available AND isParentOrOwner ='Y'	The identification number given to the parent/owner of the reporting trader by the National Futures Association		cftcBatch/cftcForm40/relatedE ntity@NFAIdentifier
98.	Parent or Owner Legal Entity Identifier	Question 8	Conditional. Required if information available AND isParentOrOwner	The legal entity identifier (LEI) assigned to the parent/owner of the reporting		cftcBatch/cftcForm40/relatedE ntity@legalEntityIdentifier

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			='Y'	trader by the LEI issuer		
99.	10% Owner	Question 8	Conditional. Required if isParentOrOwner ='Y'	Indicates if the parent of the reporting trader is a 10% beneficial owner	Y = yes N = no	cftcBatch/cftcForm40/relatedE ntity@isPercent_10
IF RE	PORTING TRAI	DER IS A COMMODIT	Y POOL			
100.	Commodity Pool Indicator	Question 8i-8iii	Conditional. Required if isParentOrOwner ='Y' AND isCommodityPool= 'Y'	For each parent/owner of the reporting trader that is a limited partner, shareholder, or other similar type of pool participant, indicates if the reported party is a commodity pool	Y = Yes N = No	cftcBatch/cftcForm40/relatedE ntity@isCommodityPool
101.	Parent or Owner Principal Indicator	Question 8i	Conditional. Required if isParentOrOwner ='Y' AND isCommodityPool= 'Y'	For each parent/owner of the reporting trader that is a limited partner, shareholder, or other similar type	Y = Yes N = No	cftcBatch/cftcForm40/relatedE ntity@isPrincipal

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				of pool participant, indicates if the reported party is a principal of the operator of the commodity pool		
102.	Parent or Owner Affiliate Indicator	Question 8i	Conditional. Required if isParentOrOwner ='Y' AND isCommodityPool= 'Y'	For each parent/owner of the reporting trader that is a limited partner, shareholder, or other similar type of pool participant, indicates if the reported party is an affiliate of the operator of the commodity pool	Y = yes N = no	cftcBatch/cftcForm40/relatedE ntity@isAffiliate
103.	Parent or Owner Commodity Pool Operator Indicator	Question 8ii	Conditional. Required if isParentOrOwner ='Y' AND isCommodityPool= 'Y'	For each parent/owner of the reporting trader that is a limited partner, shareholder, or other similar type of pool	Y = Yes N = No	cftcBatch/cftcForm40/relatedE ntity@isCommodityPoolOpera tor

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				participant, indicates if the reported party is also a commodity pool operator of the commodity pool		
104.	25% Ownership Indicator	Question 8iii	Conditional. Required if isParentOrOwner ='Y' AND isCommodityPool= 'Y'	For each parent/owner of the reporting trader that is a limited partner, shareholder, or other similar type of pool participant and where the operator of the commodity pool is exempt from registration under §4.13 of the Commission's regulations, indicates if the reported party has an ownership or equity interest of 25 percent or greater in the	Y = Yes N = No	cftcBatch/cftcForm40/relatedE ntity@isPercent_25

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				commodity pool		
SUBS INTE		REPORTING TRAD	ER/PERSONS IN WH	ICH REPORTING TR	RADER HAS 10% OR G	REATER OWNERSHIP
105.	Subsidiary or Owned Indicator	Question 9	Yes, isSubsidiaryOrOwn ed ='Y'	Indicates whether the reporting trader has at least one subsidiary and, separately, all persons in which the reporting trader has a 10 percent or greater ownership interest	Y = Yes N = No	cftcBatch/cftcForm40/relatedE ntity@isSubsidiaryOrOwned
106.	Subsidiary Company	Question 9	Conditional. Required if isSubsidiaryOrOwn ed ='Y'	Indicates if the reported party is a subsidiary of the reporting trader	Y = Yes N = No	cftcBatch/cftcForm40/relatedE ntity@isSubsidiaryCompany
107.	Subsidiary Generation	Question 9	Conditional. Required if isSubsidiaryOrOwn ed ='Y' AND isSubsidiaryCompa ny='Y'	For each subsidiary entity of the reporting trader, indicates the hierarchical level in the entity structure where the subsidiary entity is located. Direct subsidiaries	-2 = Sub of a sub -1 = Direct sub of a reporting trader	cftcBatch/cftcForm40/relatedE ntity@generation

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction of the trader have Generation = -1; subsidiaries of a Generation -1	Valid Values	XML
				parent (subs of a sub) have Generation = - 2 and so on.		
108.	Subsidiary or Owned Type Indicator	Question 9	Conditional. Required if isSubsidiaryOrOwn ed ='Y'	For each reported party, indicates if the reported party is a natural person or a legal entity	LE = Legal Entity NP = Natural Person	cftcBatch/cftcForm40/relatedE ntity@entityType
IF SU	BSIDIARY OR O	WNED ENTITY IS A I	LEGAL ENTITY			
109.	Subsidiary or Owned Entity Name	Question 9	Conditional Required if entityType = 'LE' AND isSubsidiaryOrOwn ed ='Y'	Legal name of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@legalEntityName
IF SU	BSIDIARY OR O	WNED ENTITY IS A N	NATURAL PERSON			
110.	Subsidiary or Owned Entity Last Name	Question 9	Conditional Required if entityType = 'NP' AND isSubsidiaryOrOwn	Surname of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@lastName

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			ed ='Y'			
111.	Subsidiary or Owned Entity First Name	Question 9	Conditional Required if entityType = 'NP' AND isSubsidiaryOrOwn ed ='Y'	Given or first in order name of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@firstName
112.	Subsidiary or Owned Entity Middle Name	Question 9	Conditional Required if available AND entityType = 'NP' AND isSubsidiaryOrOwn ed ='Y'	Middle name of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@middleName
113.	Subsidiary or Owned Entity Name Suffix	Question 9	Conditional Required if available AND entityType = 'NP' AND isSubsidiaryOrOwn ed ='Y'	Generational or name suffix of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@nameSuffix
FOR I	BOTH LEGAL EN	ITITIES AND NATUR	AL PERSONS			
114.	Subsidiary or Owned Entity Street Address	Question 9	Conditional. Required if isSubsidiaryOrOwn ed ='Y'	Street address of each subsidiary/owned entity of the		cftcBatch/cftcForm40/relatedE ntity@street

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				reporting trader		
115.	Subsidiary or Owned Entity Suite Number	Question 9	Conditional. Required if isSubsidiaryOrOwn ed ='Y'	Suite number of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@suite
116.	Subsidiary or Owned Entity City	Question 9	Conditional. Required if isSubsidiaryOrOwn ed ='Y'	City of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@city
117.	Subsidiary or Owned Entity State	Question 9	Conditional. Required if isSubsidiaryOrOwn ed ='Y'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm40/relatedE ntity@state
118.	Subsidiary or Owned Entity Country	Question 9	Conditional. Required if isSubsidiaryOrOwn ed ='Y'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm40/relatedE ntity@country
119.	Subsidiary or Owned Entity Zip/Postal Code	Question 9	Conditional. Required if isSubsidiaryOrOwn ed ='Y'	Zip code or postal code of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@postalCode
120.	Subsidiary or Owned Entity Phone	Question 9	Conditional. Required if isSubsidiaryOrOwn	Phone number of each subsidiary/owned		cftcBatch/cftcForm40/relatedE ntity@telephone

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Number		ed ='Y'	entity of the reporting trader		
121.	Subsidiary or Owned Entity Website	Question 9	Conditional. Required if information available AND isSubsidiaryOrOwn ed ='Y'	Website of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@website
122.	Subsidiary or Owned Entity Email Address	Question 9	Conditional. Required if isSubsidiaryOrOwn ed ='Y'	Email address of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedE ntity@email
123.	Subsidiary or Owned Entity NFA ID	Question 9	Conditional. Required if information available AND If entitytype = 'LE' AND isSubsidiaryOrOwn ed ='Y'	The identification number given to the subsidiary/owned entity by the National Futures Association		cftcBatch/cftcForm40/relatedE ntity@NFAIdentifier
124.	Subsidiary or Owned Entity Legal Entity Identifier	Question 9	Conditional. Required if information available AND If entitytype = 'LE' AND isSubsidiaryOrOwn ed ='Y'	The legal entity identifier (LEI) assigned to the subsidiary/owned entity by the LEI issuer		cftcBatch/cftcForm40/relatedE ntity@legalEntityIdentifier

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
125.	10% Owned	Question 9	Conditional. Required if isSubsidiaryOrOwn ed ='Y'	Indicates if the reported party is a person in which the reporting trader has a 10% or greater ownership interest	Y = Yes N = No	cftcBatch/cftcForm40/relatedE ntity@isPercent_10
126.	Subsidiary Principal/Affili ate Indicator	Question 9i	Conditional. Required if isSubsidiaryOrOwn ed ='Y'	For each subsidiary/owned entity that is a commodity pool and for which the reporting trader is a limited partner, shareholder, or other pool participant, indicates if the trader is a principal of the operator of the commodity pool	Y = Yes N = No	cftcBatch/cftcForm40/relatedE ntity@isPrincipal
127.	Subsidiary Affiliate Indicator	Question 9i	Conditional. Required if isSubsidiaryOrOwn ed ='Y'	For each subsidiary/owned entity that is a commodity pool and for which the reporting trader is a limited partner,	Y = Yes N = No	cftcBatch/cftcForm40/relatedE ntity@isAffiliate

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				shareholder, or other pool participant, indicates if the trader is an affiliate of the operator of the commodity pool		
128.	Subsidiary Commodity Pool Operator Indicator	Question 9ii	Conditional. Required if isSubsidiaryOrOwn ed ='Y'	For each reported party that is a commodity pool and for which the trader is a limited partner, shareholder, or other pool participant, indicates if the trader is the commodity pool operator	Y = Yes, operator N = No, not the operator	cftcBatch/cftcForm40/relatedE ntity@isCommodityPoolOpera tor
129.	Subsidiary 25% Ownership Indicator	Question 9iii	Conditional. Required if isSubsidiaryOrOwn ed ='Y'	For each reported party that is a commodity pool and for which the trader is a limited partner, shareholder, or other pool	Y = 25% or greater interest N = not 25% or greater interest	cftcBatch/cftcForm40/relatedE ntity@isPercent_25

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				participant, and for which the operator of the commodity pool is exempt from registration under §4.13 of the Commission's regulations, indicates if the trader has an ownership or equity interest of 25 percent or greater in the commodity pool		
CONT	ROL OF TRADI	NG - PERSONS OTHE	R THAN REPORTIN	G TRADER		
130.	Controller Indicator	Question 10	Yes	List all persons outside of the reporting trader that control some or all of the derivatives trading of the reporting trader – an "alternate trade controller"	Y=Yes N=No	cftcBatch/cftcForm40/relatedE ntity@isAlternateTradeControl

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
131.	Alternate Trade Controller Type Indicator	Question 10	Conditional. Required if isAlternateTradeC ontrol ='Y'	For each alternate trade controller, indicates if the person is a natural person or legal entity	LE = Legal Entity NP = Natural Person	cftcBatch/cftcForm40/relatedE ntity@entityType
IF AL	TERNATE TRAI	DE CONTROLLER IS A	A LEGAL ENTITY			
132.	Alternate Trade Controller Legal Entity Name	Question 10	Conditional. Required if entityType = 'LE' AND isAlternateTradeC ontrol ='Y'	Legal name of each alternate trade controller		cftcBatch/cftcForm40/relatedE ntity@legalEntityName
IF AL	TERNATE TRAI	DE CONTROLLER IS A	NATURAL PERSON	Ĭ		
133.	Alternate Trade Controller Last Name	Question 10	Conditional. Required If entityType = 'NP' AND isAlternateTradeC ontrol ='Y'	Surname of each alternate trade controller		cftcBatch/cftcForm40/relatedE ntity@lastName
134.	Alternate Trade Controller First Name	Question 10	Conditional, If entityType = 'NP' AND isAlternateTradeC ontrol ='Y'	Given or first in order name of each alternate trade controller		cftcBatch/cftcForm40/relatedE ntity@firstName

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
135.	Alternate Trade Controller Middle Name	Question 10	Conditional (not required), If entityType = 'NP' AND isAlternateTradeC ontrol ='Y'	Middle name of each alternate trade controller		cftcBatch/cftcForm40/relatedE ntity@middleName
136.	Alternate Trade Controller Name Suffix	Question 10	Conditional (not required), If entityType = 'NP' isAlternateTradeC ontrol ='Y'	Generational or name suffix of each alternate trade controller		cftcBatch/cftcForm40/relatedE ntity@nameSuffix
FOR 1	BOTH LEGAL EN	ITITIES AND NATUR	AL PERSONS			
137.	Alternate Trade Controller Street Address	Question 10	Conditional. Required If isAlternateTradeC ontrol ='Y'	Street address of each alternate trade controller		cftcBatch/cftcForm40/relatedE ntity@street
138.	Alternate Trade Controller Suite Number	Question 10	Conditional. Required If isAlternateTradeC ontrol ='Y'	Suite number of each alternate trade controller		cftcBatch/cftcForm40/relatedE ntity@suite
139.	Alternate Trade Controller City	Question 10	Conditional. Required If isAlternateTradeC ontrol ='Y'	City of each alternate trade controller		cftcBatch/cftcForm40/relatedE ntity@city

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
140.	Alternate Trade Controller State	Question 10	Conditional. Required If isAlternateTradeC ontrol ='Y'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm40/relatedE ntity@state
141.	Alternate Trade Controller Country	Question 10	Conditional. Required If isAlternateTradeC ontrol ='Y'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm40/relatedE ntity@country
142.	Alternate Trade Controller Zip/Postal Code	Question 10	Conditional. Required If isAlternateTradeC ontrol ='Y'	Zip code or postal code of each alternate trade controller		cftcBatch/cftcForm40/relatedE ntity@postalCode
143.	Alternate Trade Controller Phone Number	Question 10	Conditional. Required If isAlternateTradeC ontrol ='Y'	Phone number of each alternate trade controller		cftcBatch/cftcForm40/relatedE ntity@telephone
144.	Alternate Trade Controller Website	Question 10	Conditional. Required If information avaliable AND isAlternateTradeC ontrol ='Y'	Website of each alternate trade controller		cftcBatch/cftcForm40/relatedE ntity@website
145.	Alternate Trade Controller	Question 10	Conditional. Required if isAlternateTradeC	Email address of each alternate trade controller		cftcBatch/cftcForm40/relatedE ntity@email

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Email Address		ontrol ='Y'			
146.	Alternate Trade Controller NFA ID	Question 10	Conditional. Required if information available AND isAlternateTradeC ontrol ='Y'	The identification number given to the alternate trade controller by the National Futures Association		cftcBatch/cftcForm40/relatedE ntity@NFAIdentifier
147.	Alternate Trade Controller Legal Entity Identifier	Question 10	Conditional. Required if information available AND isAlternateTradeC ontrol ='Y'	The legal entity identifier (LEI) assigned to the alternate trade controller by the LEI issuer		cftcBatch/cftcForm40/relatedE ntity@legalEntityIdentifier
148.	Alternate Trade Controller Some/All Indicator	Question 10	Conditional. Required If isAlternateTradeC ontrol ='Y'	Indicates if the alternate trade controller controls some or all of the derivatives trading of the reporting trader	S = Some A = All	cftcBatch/cftcForm40/relatedE ntity@toWhatDegree
PERS	ONS FOR WHIC	H REPORTING TRAD	DER CONTROLS TRA	DING		
149.	Controlee Indicator	Question 11	Yes	List all persons for which the reporting trader controls some or all of the	Y=Yes N=No	cftcBatch/cftcForm40/relatedE ntity@isTradeControlFor

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction derivatives trading (a "controlee")	Valid Values	XML
150.	Controlee Type Indicator	Question 11	Conditional. Required if isTradeControlFor ='Y'	For each controlee, indicates whether the person is a legal entity or natural person	LE = Legal Entity NP = Natural Person	cftcBatch/cftcForm40/relatedE ntity@entityType
IF CO	NTROLEE IS A I	EGAL ENTITY				
151.	Controlee Legal Entity Name	Question 11	Conditional. Required if entityType = 'LE' AND isTradeControlFor ='Y'	Legal name of each controlee		cftcBatch/cftcForm40/relatedE ntity@legalEntityName
IF CO	NTROLEE IS A N	NATURAL PERSON				
152.	Controlee Last Name	Question 11	Conditional. Required if entityType = 'NP' AND isTradeControlFor ='Y'	Surname of each controlee		cftcBatch/cftcForm40/relatedE ntity@lastName
153.	Controlee First Name	Question 11	Conditional. Required if entityType = 'NP' AND	Given or first in order name of each controlee		cftcBatch/cftcForm40/relatedE ntity@firstName

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			isTradeControlFor ='Y'			
154.	Controlee Middle Name	Question 11	Conditional. Required if information avaliable AND entityType = 'NP' AND isTradeControlFor ='Y'	Middle name of each controlee		cftcBatch/cftcForm40/relatedE ntity@middleName
155.	Controlee Name Suffix	Question 11	Conditional. Required if information avaliable AND entityType = 'NP' AND isTradeControlFor ='Y'	Generational or name suffix of each controlee		cftcBatch/cftcForm40/relatedE ntity@nameSuffix
FOR 1	BOTH LEGAL EN	TITIES AND NATUR	AL PERSONS			
156.	Controlee Street Address	Question 11	Conditional. Required if isTradeControlFor ='Y'	Street address of each controlee		cftcBatch/cftcForm40/relatedE ntity@street
157.	Controlee Suite Number	Question 11	Conditional. Required if information avaliable AND	Suite number of each controlee		cftcBatch/cftcForm40/relatedE ntity@suite

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			isTradeControlFor ='Y'			
158.	Controlee City	Question 11	Conditional. Required if isTradeControlFor ='Y'	City of each controlee		cftcBatch/cftcForm40/relatedE ntity@city
159.	Controlee State	Question 11	Conditional. Required if isTradeControlFor ='Y'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm40/relatedE ntity@state
160.	Controlee Country	Question 11	Conditional. Required if isTradeControlFor ='Y'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm40/relatedE ntity@country
161.	Controlee Zip/Postal Code	Question 11	Conditional. Required if isTradeControlFor ='Y'	Zip code or postal code of each controlee		cftcBatch/cftcForm40/relatedE ntity@postalCode
162.	Controlee Phone Number	Question 11	Conditional. Required if isTradeControlFor ='Y'	Phone number of each controlee		cftcBatch/cftcForm40/relatedE ntity@telephone
163.	Controlee Website	Question 11	Conditional. Required if Information available AND isTradeControlFor	Website of each controlee		cftcBatch/cftcForm40/relatedE ntity@website

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			='Y'			
164.	Controlee Email Address	Question 11	Conditional. Required if isTradeControlFor ='Y'	Email address of each controlee		cftcBatch/cftcForm40/relatedE ntity@email
165.	Controlee NFA ID	Question 11	Conditional. Required If Information Avaliable AND isTradeControlFor ='Y'	The identification number given to the controlee by the National Futures Association		cftcBatch/cftcForm40/relatedE ntity@NFAIdentifier
166.	Controlee Legal Entity Identifier	Question 11	Conditional. Required If Information Avaliable AND isTradeControlFor ='Y'	The legal entity identifier (LEI) assigned to the controlee by the LEI issuer		cftcBatch/cftcForm40/relatedE ntity@legalEntityIdentifier
167.	Controlee Some/All Indicator	Question 11	Conditional. Required If isTradeControlFor ='Y'	Indicates if the reporting trader controls some or all of the derivatives trading of the controlee	S = Some A = All	cftcBatch/cftcForm40/relatedE ntity@toWhatDegree
ОТНІ	ER PERSON THA	T INFLUENCES OR E	XERCISES AUTHOR	ITY OVER TRADING	•	
168.	Influencer/ Authority	Question 12	Yes	List any other person(s) that	Y=Yes N=No	cftcBatch/cftcForm40/relatedE ntity@isOtherInfluence

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Indicator			directly or indirectly influence, or exercise authority over, some or all of the trading of the reporting trader, but who do not exercise "control" as defined in the OCR Final Rule (a "Reportable Influencer")		
169.	Influencer/Au thority Type Indicator	Question 12	Conditional. Required if isOtherInfluence=' Y'	For each reportable influencer, indicates whether the person is legal entity or natural person	LE = Legal Entity NP = Natural Person	cftcBatch/cftcForm40/relatedE ntity@entityType
IF RE	PORTABLE INF	LUENCER IS A LEGAI	ENTITY			
170.	Influencer/Au thority Legal Entity Name	Question 12	Conditional. Required if entityType='LE' AND isOtherInfluence=' Y'	Legal name of each reportable influencer		cftcBatch/cftcForm40/relatedE ntity@legalEntityName

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IF RE	Data Element PORTABLE INF	Form 40 Question Number LUENCER IS A NATU	Required RAL PERSON	CFTC Description, Purpose or Instruction	Valid Values	XML
171.	Influencer/Au thority Last Name	Question 12	Conditional. Required if entityType='NP' AND isOtherInfluence=' Y'	Surname of each reportable influencer		cftcBatch/cftcForm40/relatedE ntity@lastName
172.	Influencer/Au thority First Name	Question 12	Conditional. Required if entityType='NP' AND isOtherInfluence=' Y'	Given or first in order name of each reportable influencer		cftcBatch/cftcForm40/relatedE ntity@firstName
173.	Influencer/Au thority Middle Name	Question 12	Conditional. Required If Information Avaliable AND entityType='NP' AND isOtherInfluence=' Y'	Middle name of each reportable influencer		cftcBatch/cftcForm40/relatedE ntity@middleName
174.	Influencer/Au thority Name Suffix	Question 12	Conditional. Required If Information Avaliable AND entityType='NP' AND isOtherInfluence='	Generational or name suffix of each reportable influencer		cftcBatch/cftcForm40/relatedE ntity@nameSuffix

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			Υ'			
FOR	BOTH LEGAL EN	ITITIES AND NATUR	AL PERSONS			
175.	Influencer/Au thority Street Address	Question 12	Conditional. Required if isOtherInfluence=' Y'	Street address of each reportable influencer		cftcBatch/cftcForm40/relatedE ntity@street
176.	Influencer/Au thority Suite Number	Question 12	Conditional. Required If Information Avaliable AND isOtherInfluence=' Y'	Suite number of each reportable influencer		cftcBatch/cftcForm40/relatedE ntity@suite
177.	Influencer/Au thority City	Question 12	Conditional. Required if isOtherInfluence=' Y'	City of each reportable influencer		cftcBatch/cftcForm40/relatedE ntity@city
178.	Influencer/Au thority State	Question 12	Conditional. Required if isOtherInfluence=' Y'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm40/relatedE ntity@state
179.	Influencer/Au thority Country	Question 12	Conditional. Required if isOtherInfluence=' Y'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm40/relatedE ntity@country

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
180.	Influencer/Au thority Zip/Postal Code	Question 12	Conditional. Required if isOtherInfluence=' Y'	Zip code or postal code of each reportable influencer		cftcBatch/cftcForm40/relatedE ntity@postalCode
181.	Influencer/Au thority Phone Number	Question 12	Conditional. Required if isOtherInfluence=' Y'	Phone number of each reportable influencer		cftcBatch/cftcForm40/relatedE ntity@telephone
182.	Influencer/Au thority Website	Question 12	Conditional. Required if Information Avalaible AND isOtherInfluence=' Y'	URL for the website of each reportable influencer		cftcBatch/cftcForm40/relatedE ntity@website
183.	Influencer/Au thority Email Address	Question 12	Conditional. Required if isOtherInfluence=' Y'	Email address of each reportable influencer		cftcBatch/cftcForm40/relatedE ntity@email
184.	Influencer/Au thority NFA ID	Question 12	Conditional. Required If Information available AND isOtherInfluence=' Y'	The identification number given to the influencer/authori ty by the National Futures Association		cftcBatch/cftcForm40/relatedE ntity@NFAIdentifier
185.	Influencer/Au thority Legal Entity Identifier	Question 12	Conditional. Required If Information available AND	The legal entity identifier (LEI) assigned to the influencer/authori		cftcBatch/cftcForm40/relatedE ntity@legalEntityIdentifier

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			isOtherInfluence=' Y'	ty by the LEI issuer		
186.	Influencer/Au thority Some/All Indicator	Question 12	Conditional. Required If isOtherInfluence=' Y'	Indicates if the identified party influences or exercises authority over some or all of the derivatives trading of the reporting trader	S = Some A = All	cftcBatch/cftcForm40/relatedE ntity@toWhatDegree
EXPR	ESS OR IMPLIE	D AGREEMENT - CON	TACT INFORMATION	ON		
187.	Derivatives Trading Agreement Indicator	Question 13	Yes	Indicates if some or all of the derivatives trading of the reporting trader is subject to an express or implied agreement/unders tanding with any person(s) not already listed.	Y = Yes N = No	cftcBatch/cftcForm40/relatedE ntity@isOtherAgreement
188.	Reportable Party Entity Type	Question 13	Conditional. Required if isOtherAgreement ='Y'	For each reportable party, indicates such person is a legal entity or natural	LE = Legal Entity NP = Natural Person	cftcBatch/cftcForm40/relatedE ntity@entityType

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				person		
IF RE	PORTABLE PAR	RTY IS A LEGAL ENTI	TY			
189.	Reportable Party Legal Entity Name	Question 13	Conditional. Required if entityType='LE' AND isOtherAgreement ='Y'	Legal name of each reportable party		cftcBatch/cftcForm40/relatedE ntity@legalEntityName
IF RE	PORTABLE PAR	RTY IS A NATURAL P	ERSON			
190.	Reportable Party Last Name	Question 13	Conditional. Required if entityType='NP' AND isOtherAgreement ='Y'	Surname of each reportable party		cftcBatch/cftcForm40/relatedE ntity@lastName
191.	Reportable Party First Name	Question 13	Conditional. Required if entityType='NP' AND isOtherAgreement ='Y'	Given or first in order name of each reportable party		cftcBatch/cftcForm40/relatedE ntity@firstName
192.	Reportable Party Middle Name	Question 13	Conditional. Required If Information Avaliable AND	Middle name of each reportable party		cftcBatch/cftcForm40/relatedE ntity@middleName

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			entityType='NP' AND isOtherAgreement ='Y'			
193.	Reportable Party Name Suffix	Question 13	Conditional. Required If Information Avaliable AND entityType='NP' AND isOtherAgreement ='Y'	Generational or name suffix of each reportable party		cftcBatch/cftcForm40/relatedE ntity@nameSuffix
FOR I	BOTH LEGAL EN	ITITIES AND NATUR	AL PERSONS			
194.	Reportable Party Street Address	Question 13	Conditional. Required if isOtherAgreement ='Y'	Street address of each reportable party		cftcBatch/cftcForm40/relatedE ntity@street
195.	Reportable Party Suite Number	Question 13	Conditional. Required If Information Avaliable AND isOtherAgreement ='Y'	Suite number of each reportable party		cftcBatch/cftcForm40/relatedE ntity@suite
196.	Reportable Party City	Question 13	Conditional. Required if isOtherAgreement ='Y'	City of each reportable party		cftcBatch/cftcForm40/relatedE ntity@city

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
197.	Reportable Party State	Question 13	Conditional. Required if isOtherAgreement ='Y'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm40/relatedE ntity@state
198.	Reportable Party Country	Question 13	Conditional. Required if isOtherAgreement ='Y'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm40/relatedE ntity@country
199.	Reportable Party Zip/Postal Code	Question 13	Conditional. Required if isOtherAgreement ='Y'	Zip Code or postal code of each reportable party		cftcBatch/cftcForm40/relatedE ntity@postalCode
200.	Reportable Party Phone Number	Question 13	Conditional. Required if isOtherAgreement ='Y'	Phone number of each reportable party		cftcBatch/cftcForm40/relatedE ntity@telephone
201.	Reportable Party Website	Question 13	Conditional. Required if Information Avaliable AND isOtherAgreement ='Y'	URL for the website of each reportable party		cftcBatch/cftcForm40/relatedE ntity@website
202.	Reportable Party Email Address	Question 13	Conditional. Required if isOtherAgreement ='Y'	Email address of each reportable party		cftcBatch/cftcForm40/relatedE ntity@email

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
203.	Reportable Party NFA ID	Question 13	Conditional. Required if Information avaliable isOtherAgreement ='Y'	The identification number given to the reportable party by the National Futures Association		cftcBatch/cftcForm40/relatedE ntity@NFAIdentifier
204.	Reportable Party Legal Entity Identifier	Question 13	Conditional. Required if Information avaliable isOtherAgreement ='Y'	The legal entity identifier (LEI) assigned to the reportable party by the LEI issuer		cftcBatch/cftcForm40/relatedE ntity@legalEntityIdentifier
205.	Reportable Party Some/All Indicator	Question 13	Conditional. Required if isOtherAgreement ='Y'	Indicates if some or all of the reporting trader's derivatives trading is subject to an agreement or understanding with the reportable party	S = Some A = All	cftcBatch/cftcForm40/relatedE ntity@toWhatDegree

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тие	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML APPEAR IN THE FORM 40
		PPENDIX TO THE OC		ITONS AND SUFFLE	MENTAL LISTS THAT	AFFEAR IN THE FORM 40
206.	Commodity Index Trading Indicator (Paragraph A)	Question 14i	Yes	Indicates if the reporting trader is engaged in Commodity Index Trading as defined in Paragraph A of the CIT definition	Y = Yes N = No	cftcBatch/cftcForm40@isCom modityIndexTrader_investor
207.	Commodity Index Trading Indicator (Paragraph B)	Question 14ii	Yes	Indicates if the reporting trader is engaged in Commodity Index Trading as defined in Paragraph B of the CIT definition	Y = Yes N = No	cftcBatch/cftcForm40@isCom modityIndexTrader_manager
208.	CIT Long/Short Exposure	Question 14iia	Conditional. Required if isCommodityIndex	Indicates if the reporting trader [that is engaged in	L = Long S = Short	cftcBatch/cftcForm40@comm odityIndexExposure

Visit this link to view a pdf copy of the OCR Final Rule: http://www.cftc.gov/ucm/groups/public/@lrfederalregister/documents/file/2013-26789a.pdf

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²³ Reporting parties should visit this link to view the OCR Final Rule on the Federal Register: https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71

Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
Indicator		Trader_manager = 'Y'	Commodity Index Trading as defined in Paragraph B and with respect to commodities in Supplemental List II] is pursuing aggregate long or short exposure with respect to such commodities or commodity groups. It is not necessary to respond to this question with respect to CIT that tracks the performance of multiple unrelated commodities or commodity groups (e.g., an investment in an exchange-traded fund that tracks the performance of an index representing		

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				commodities spanning multiple commodity groups).		
209.	Commodity Index Trading Start Date	Question 14iia	Conditional.Required if isCommodityIndex Trader_manager = 'Y' OR isCommodityIndex Trader_investor = 'Y'	For traders who are engaged in Commodity Index Trading as defined in Paragraph A or B of the CIT definition, indicates the month and year in which the trader first became engaged in such trading.	YYYY-MM-DD	cftcBatch/cftcForm40@initiate dCommodityIndexTrading
210.	Swap Dealer Indicator	Question 15	Yes	Indicates if the reporting trader is a swap dealer as defined in § 1.3(ppp) of regulations under the Commodity Exchange Act	Y = Yes N = No	cftcBatch/cftcForm40@isSwap Dealer
211.	Major Swap Participant Indicator	Question 16	Yes	Indicates if the reporting trader is a Major Swap Participant, as	Y = Yes N = No	cftcBatch/cftcForm40@isSwap Participant

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				defined in § 1.3(qqq) of regulations under the Commodity Exchange Act		
212.	Business Sector	Question 17	No	Each business sector and subsector that pertains to the business activities or occupation of the reporting trader	See Appendix B of this Technical Document – Supplemental List I for valid submission codes	cftcBatch/cftcForm40/natureO fBusiness@businessSector
213.	Business Subsector	Question 17	No	Each business sector and subsector that pertains to the business activities or occupation of the reporting trader	See Appendix B of this Technical Document – Supplemental List I for valid submission codes	cftcBatch/cftcForm40/natureOfBusiness@businessSubSector
214.	Other Description – Business Subsector	Question 17	No	Description of the subsector in the event that "Other" is selected.		cftcBatch/cftcForm40/natureO fBusiness@otherDescription
215.	Primary Subsector	Question 17	Conditional. Required if businessSubSector is not null.	In the event that more than one (sub)sector is listed, an	Y=Yes N=No	cftcBatch/cftcForm40/natureO fBusiness@isPrimary

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				indication of the (sub)sector primarily describes the nature of the reporting trader's business		
216.	Commodities Traded	Question 18	No	Each individual commodity or commodity group that the reporting trader presently trades or expects to trade in the near future in derivatives markets (There is a supplementary list to select from in the form)	See Appendix B of this Technical Document – Supplemental List II for valid submission codes	cftcBatch/cftcForm40/natureO fBusiness@commodity
217.	Commodity Groups Traded	Question 18	No	Each individual commodity or commodity group that the reporting trader presently trades or expects to trade in the near future in derivatives markets (There is a	See Appendix B of this Technical Document – Supplemental List II for valid submission codes	cftcBatch/cftcForm40/natureOfBusiness@commodityGroup

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				supplementary list to select from in the form)		
218.	Other Description – Commodity/C ommodity Group Traded	Question 18	No	A description of the commodity group and commodity in the event that the user selects "Other".		cftcBatch/cftcForm40/natureO fBusiness@otherDescription
219.	Individual Commodity Business Purpose	Question 19	Conditional. Required if Individual Commodity is selected, then business purpose must be added.	For each listed individual commodity, indicates the business purposes for which the reporting trader uses derivatives markets (There is a supplementary list to select from in the form)	See Appendix B of this Technical Document – Supplemental List III for valid submission codes	cftcBatch/cftcForm40/natureO fBusiness@businessPurpose
220.	Individual Commodity Predominant Business Purpose Indicator	Question 19	ConditionalRequir ed if businessPurpose is not null.	If the reporting trader has more than one business purpose for trading in an individual commodity,	Y=Yes N=No	cftcBatch/cftcForm40/natureO fBusiness@isPrimary

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	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				indicates the predominant business purpose ²⁴		
221.	Reporting Trader Authorization Indicator	Question 20	Yes	Indicates if the submitter is duly authorized by the reporting trader to provide the information and representations submitted on this Form 40, and that information and representations are true and correct	Y = authorized N = not authorized	cftcBatch/cftcForm40/contact @isAuthorizedRepresentative
222.	Authorized Representativ e Last Name	Question 20	Yes	Surname of the authorized representative		cftcBatch/cftcForm40/contact @lastName
223.	Authorized Representativ e First Name	Question 20	Yes	Given or first in order name of the authorized representative		cftcBatch/cftcForm40/contact @firstName

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²⁴ When responding to question 19, reporting traders should use their discretion in determining the predominant business purpose. A "predominant business purpose" may include, for example, the business purpose that is predominant in terms of monetary value, or other business purpose deemed predominant by a reporting trader.

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
224.	Authorized Representativ e Middle Name	Question 20	Yes	Middle name of the authorized representative		cftcBatch/cftcForm40/contact @middleName
225.	Authorized Representativ e Name Suffix	Question 20	Yes	Generation or name suffix of the authorized representative		cftcBatch/cftcForm40/contact @nameSuffix
226.	Authorized Representativ e Position	Question 20	Yes	Job position of the authorized representative		cftcBatch/cftcForm40/contact @titleOrPosition
227.	Authorized Representativ e Submitted on behalf of	Question 20	Yes	Reporting Trader Name 40 was submitted on behalf of		cftcBatch/cftcForm40@onBeh alfOf
228.	Date of Submission	Question 20	Yes	Date [indicated by the authorized representative] that the form was submitted to CFTC		cftcBatch/cftcForm40@submit Date

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Appendix A: SFTP Account Registration

To register an SFTP account:

- 1. Browse to the Account Creation Page on the Commission's website, https://services.cftc.gov/CreateCFTCAccount/CreateLoginAccount.aspx.
- 2. Confirm that you have read the agreement and agree to abide by its terms by selecting the **Agreement to Terms of Use** check box and clicking **Agree**.

U.S. COMMODITY FUTURES TRADING COMMISSION

ENSURING THE INTEGRITY OF THE FUTURES & OPTIONS MARKETS

ABOUT THE CFTC

PRESS

CONSUMER PROTECTION

INDUSTRY OVERSIGHT

INTERNATIONAL

LAW &

MARKET REPORTS Home // Industry Oversight // Market Surveillance // CFTC Account Home // CFTC User Agreement

CFTC DATA SUBMISSION ACCOUNT CREATION & USER REGISTRATION

These terms of use apply exclusively to your access to, and use of, CFTC data submission systems and do not alter in any way the terms or conditions of any other agreement you may have with the CFTC.

These terms of use may be changed at any time without notice by the CFTC.

If any provision of these terms of use shall be deemed unlawful, void, or for any reason unenforceable, then that provision shall be deemed severable from these terms of use and shall not affect the validity and enforceability of any remaining provisions.

User ID and Password

A unique User ID and Password will be generated by the CFTC and e-mailed to the e-mail address you provide. You agree to notify the CFTC immediately if you have reason to believe your password has been lost or stolen; your account has been accessed improperly; or attempts have been made to access your account without your

Only one individual or entity can use each User ID and Password. Accounts are non-transferable. User IDs and Passwords may be used only to submit valid data and may not be used for any fraudulent purposes. The CFTC reserves the right to reset any Passwords that have been lost or stolen or have not been used for more than 120 days.

Privacy Act Disclosure

The CFTC is authorized to collect reports and information from traders with derivatives positions pursuant to, among other sections, Sections 2(d), 4i, 4t and 8 of the Commodity Exchange Act (7 U.S.C. 2(d), 6i, 4t and 12). The information requested is used generally to gather information concerning the size and composition of the derivatives markets and to facilitate the CFTC's market and financial surveillance responsibilities. Information collected may be used by the Commission for investigations or litigation and, in limited circumstances, may be made public in accordance with provisions of the Commodity Exchange Act. Information may also be disclosed to other government agencies, and, in certain situations, it may be disclosed to any "registered entity" (as defined in Commodity Exchange Act Section 1a), to any registered futures association registered under Section 17 of the Commodity Exchange Act, and to any national securities exchange or national securities association registered with the Securities and Exchange Commission to assist those organizations in carrying out their self-regulatory responsibilities under the Securities Exchange Act of 1934, 15 USC 78a, et seq.

The complete listing of routine uses of the information contained in these records, in accordance with the Privacy Act, 5 U.S.C. §522a, and the Commission's rules thereunder, 17 CFR Part 146, is found in the Commission's compilation of its System of Records Notices, 76 Fed. Reg. 5974 (February 2, 2011), as may be amended. Disclosure of the information requested is mandatory for covered individuals and organizations, and failure to comply may result in the imposition of criminal or civil sanctions.

To report a lost or stolen Password, improper use of your account, or attempts to use your account, contact us immediately by telephone at 202-418-5600 or by email to DCITSCSC@cftc.gov.

Agreement to Terms of Use:

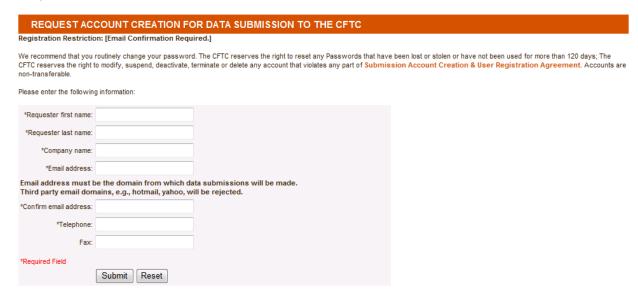
I have read the usage agreement and agree to abide by its terms.

After selecting the Agree button, you will be directed to a page where you can request the User ID and Password required to enter and submit data to the CFTC.

For information, contact: Susan Donlan Chief, Market Information Group New York Regional Office sdonlan@cftc.gov 646-746-9784

Margaret Sweet Assistant Branch Chief Chicago Regional Office msweet@cftc.gov 312-596-0609

- 3. On the **Request Account Creation** page, supply the following information:
 - Requester first name The first name of the user requesting the account
 - Requester last name The last name (or surname) of the user requesting the account
 - Company name The Company that will be supplying the data to the CFTC
 - **Email address** The email address of the contact. The email address must be from the domain that will be submitting data; the Reporting Entities domain. Third party email domains (e.g., hotmail, yahoo, gmail) will not be accepted.
 - **Telephone** The requester's phone number, should CFTC need to confirm the user via a phone call.
 - Fax Not required

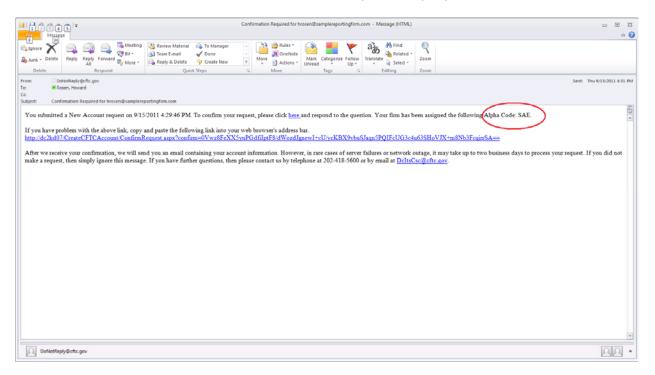


Once you have submitted the data, the request will be passed to CFTC's Office of Data and Technology for approval.

REQUEST ACCOUNT CREATION FOR DATA SUBMISSION TO THE CFTC
The CFTC will review your request and send you an email after your request has been processed.
Return to CFTC.gov

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4. Once the account creation is approved, you will be sent an email with a link to confirm the request. Note the **three-letter Alpha Code** that must be used for all data submissions made by this company to the CFTC.

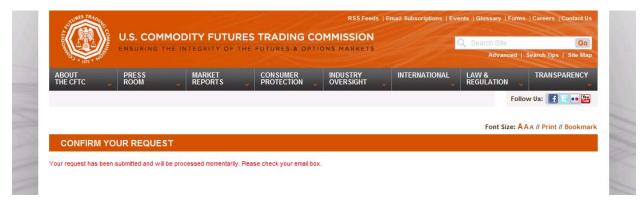


- 5. Click the **confirmation link** in the email (or copy the URL into your web browser).
- 6. On the **Confirm Your Request** screen, confirm the account creation request by typing in the **three-letter Alpha Code** supplied in the email and click **Confirm**.

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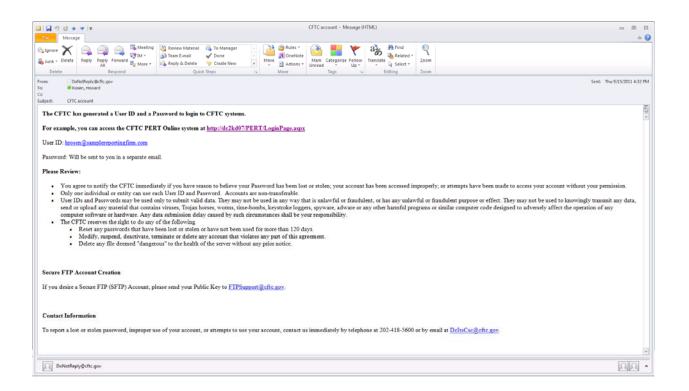


A message will display indicating that your request has been submitted.



You will receive two follow-on emails from the CFTC. Each email will address guidelines for using this account. The first email will contain your new user ID and instructions on converting your FTP Account to a Secure FTP Account.

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7. All reporting entities must exchange their Public Keys with the CFTC to activate their Secure FTP account. Send your **Public Key** to FTPSupport@cftc.gov.

You will then receive the second email, which will contain your new password for the FTP account.

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Appendix B: Supplemental Lists

Supplemental List I: List of Business Sectors and Subsectors²⁵

Business Sector Name	Business Sector Code	Business Subsector Name	Business Subsector Code
Agriculture and Forestry	SA	Oilseed Farming	SSA
Agriculture and Forestry	SA	Grain Farming	SSB
Agriculture and Forestry	SA	Fruit and Tree Nut Farming	SSC
Agriculture and Forestry	SA	Other Crop Farming (Specify)	SSD
Agriculture and Forestry	SA	Cattle Ranching and Farming	SSE
Agriculture and Forestry	SA	Hog and Pig Farming	SSF
Agriculture and Forestry	SA	Poultry and Egg Production	SSG
Agriculture and Forestry	SA	Sheep and Goat Farming	SSH
Agriculture and Forestry	SA	Other Animal Production	SSI
Agriculture and Forestry	SA	Forestry, Logging, or Timber Production	SSJ
Agriculture and Forestry	SA	Cooperative	SSK

 $Visit\ this\ link\ to\ view\ a\ pdf\ copy\ of\ the\ OCR\ Final\ Rule:\ http://www.cftc.gov/ucm/groups/public/@lrfederalregister/documents/file/2013-26789a.pdf$

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When reviewing the Appendix B Supplemental Lists in this Technical Document, reporting parties should also review and consult the OCR Final Rule, including the requirements of Form 40 included in the appendix thereto. This Form 40 is the basis for these Appendix B Supplemental Lists. Reporting parties should visit this link to view the OCR Final Rule on the Federal Register: https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71

Business Sector Name	Business Sector Code	Business Subsector Name	Business Subsector Code
Agriculture and Forestry	SA	Other (Specify)	SSL
Mining, Oil and Natural Gas Extraction	SB	Oil Exploration/Production	SSM
Mining, Oil and Natural Gas Extraction	SB	Natural Gas Exploration/Production	SSN
Mining, Oil and Natural Gas Extraction	SB	Coal Mining	SSO
Mining, Oil and Natural Gas Extraction	SB	Precious Metal Mining	SSP
Mining, Oil and Natural Gas Extraction	SB	Non-Precious Metal Mining	SSQ
Mining, Oil and Natural Gas Extraction	SB	Other (Specify)	SSR
Utilities	SC	Utility/Cooperative	SSS
Utilities	SC	Electric Power Generation	SST
Utilities	SC	Local Distribution Company	SSU
Utilities	SC	Natural Gas Distribution	SSV
Utilities	SC	Other (Specify)	SSW
Construction	SD	Building Construction	SSX
Construction	SD	Heavy and Civil Engineering Construction	SSY
Construction	SD	Other (Specify)	SSZ
Manufacturing, Refining and Processing	SE	Animal Food Manufacturing	SSAA
Manufacturing, Refining and Processing	SE	Grain Milling	SSAB
Manufacturing, Refining and Processing	SE	Oilseed Milling	SSAC
Manufacturing, Refining and Processing	SE	Sugar and Confectionery Product Manufacturing	SSAD

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Business Sector Name	Business Sector Code	Business Subsector Name	Business Subsector Code
Manufacturing, Refining and Processing	SE	Fruit and Vegetable Preserving and Specialty Food Manufacturing	SSAE
Manufacturing, Refining and Processing	SE	Dairy Product Manufacturing	SSAF
Manufacturing, Refining and Processing	SE	Animal Slaughtering and Processing	SSAG
Manufacturing, Refining and Processing	SE	Bakeries	SSAH
Manufacturing, Refining and Processing	SE	Other Food Manufacturing	SSAI
Manufacturing, Refining and Processing	SE	Beverage Manufacturing Textile Mills	SSAJ
Manufacturing, Refining and Processing	SE	Textile Product Mills	SSAK
Manufacturing, Refining and Processing	SE	Apparel Manufacturing	SSAL
Manufacturing, Refining and Processing	SE	Wood Product Manufacturing	SSAM
Manufacturing, Refining and Processing	SE	Paper Manufacturing	SSAN
Manufacturing, Refining and Processing	SE	Pulp, Paper, and Paperboard Mills	SSAO
Manufacturing, Refining and Processing	SE	Petroleum and Coal Products Manufacturing	SSAP
Manufacturing, Refining and Processing	SE	Renewable Fuels Manufacturing	SSAQ
Manufacturing, Refining and Processing	SE	Petrochemical/Chemical Manufacturing	SSAR
Manufacturing, Refining and Processing	SE	Plastics and Rubber Products Manufacturing	SSAS
Manufacturing, Refining and Processing	SE	Natural Gas Processing	SSAT
Manufacturing, Refining and Processing	SE	Precious Metal Processor/Smelter	SSAU
Manufacturing, Refining and Processing	SE	Non-Precious Metal Processor	SSAV

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Business Sector Name	Business Sector Code	Business Subsector Name	Business Subsector Code
Manufacturing, Refining and Processing	SE	Metals Fabricator	SSAW
Manufacturing, Refining and Processing	SE	Other (Specify)	SSAX
Wholesale Trade	SF	Lumber and Other Construction Materials Merchant Wholesalers	SSAY
Wholesale Trade	SF	Metal and Mineral Merchant Dealer	SSAZ
Wholesale Trade	SF	Grocery and Related Product Merchant Wholesaler	SSBA
Wholesale Trade	SF	Farm Product Raw Material Merchant Wholesalers	SSBB
Wholesale Trade	SF	Chemical and Allied Products Merchant Wholesalers	SSBC
Wholesale Trade	SF	Petroleum and Petroleum Products Merchant Wholesalers	SSBD
Wholesale Trade	SF	Natural Gas, Power Marketer	SSBE
Wholesale Trade	SF	Importer/Exporter (specify commodities)	SSBF
Wholesale Trade	SF	Other (Specify	SSBG
Retail Trade	SG	Building Materials and Supplies Dealers	SSBH
Retail Trade	SG	Food and Beverage Stores	SSBI
Retail Trade	SG	Jeweler/Precious Metals Retailer	SSBJ
Retail Trade	SG	Vehicle Fuel Retailer/Convenience Store Operator	SSBK

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Business Sector Name	Business Sector Code	Business Subsector Name	Business Subsector Code
Retail Trade	SG	Fuel Dealers	SSBL
Retail Trade	SG	Other (Specify)	SSBM
Transportation and Warehousing	SH	Air Transport	SSBN
Transportation and Warehousing	SH	Trucking	SSBO
Transportation and Warehousing	SH	Pipeline Transportation of Crude Oil	SSBP
Transportation and Warehousing	SH	Pipeline Transportation of Natural Gas	SSBQ
Transportation and Warehousing	SH	Farm Product Warehousing and Storage	SSBR
Transportation and Warehousing	SH	Energy Distributor (warehousing, storage)	SSBS
Transportation and Warehousing	SH	Other (Specify)	SSBT
End User (NOTE: May not be the only/primary subsector selected)	SI	Metals End User (Construction Co., Brass Mill, Steel Mill)	SSBU
End User (NOTE: May not be the only/primary subsector selected)	SI	Emissions End User (Factory, Industrial Cos.)	SSBV
End User (NOTE: May not be the only/primary subsector selected)	SI	Petroleum End User (Airline Cos. Municipalities, Industrial Cos., Trucking Cos.)	SSBW
Information	SJ	Other (Specify)	SSBX
Real Estate	SK	Other (Specify)	SSBY
Arts, Entertainment, and Recreation	SL	Performing Arts Companies	SSBZ
Arts, Entertainment, and Recreation	SL	Promoters of Performing Arts	SSCA
Arts, Entertainment, and Recreation	SL	Agents and Managers for Artists and Entertainers	SSCB

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Business Sector Name	Business Sector Code	Business Subsector Name	Business Subsector Code
Arts, Entertainment, and Recreation	SL	Independent Artists, Writers, Performers	SSCC
Arts, Entertainment, and Recreation	SL	Other (Specify)	SSCD
Accommodation and Food Services	SM	Food Services	SSCE
Accommodation and Food Services	SM	Other (Specify)	SSCF
Public Administration	SN	Administration of Environmental Quality Programs	SSCG
Public Administration	SN	Administration of Economic Programs	SSCH
Public Administration	SN	Other (Specify)	SSCI

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Supplemental List II: List of Commodity Group and Individual Commodities

Commodity Group Name	Commodity Group Code	Individual Commodity Name	Individual Commodity Code
Base Metals	N25	Copper	085
Base Metals	N25	Steel	192
Chemicals	N40		
Currency	F10		
Dairy Products	A25	Butter	050
Dairy Products	A25	Milk	052
Dairy Products	A25	Cheese	063
Electricity And Sources	N16	Uranium	016
Electricity And Sources	N16	Coal	024
Electricity And Sources	N16	Electricity	064
Emissions	N60		
Equities And Equity Indicies	XXX		
Fiber	A40	Cotton	033
Foodstuffs/Softs	A50	Coffee	083
Foodstuffs/Softs	A50	Frozen Concentrated Orange Juice	040
Foodstuffs/Softs	A50	Sugar	080
Foodstuffs/Softs	A50	Cocoa	073
Grains	A10	Wheat	001

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Commodity Group Name	Commodity Group Code	Individual Commodity Name	Individual Commodity Code
Grains	A10	Corn	002
Grains	A10	Oats	004
Grains	A10	Rice	039
Interest Rates - U.S. Treasury	F30		
Livestock/Meat Products	A20	Live Cattle	057
Livestock/Meat Products	A20	Pork Bellies	056
Livestock/Meat Products	A20	Feeder Cattle	061
Livestock/Meat Products	A20	Lean Hogs	054
Natural Gas And Products	N13	Natural Gas	023
Natural Gas And Products	N13	Natural Gas Liquids	066
Oilseed And Products	A30	Soybeans	005
Oilseed And Products	A30	Soybean Oil	007
Oilseed And Products	A30	Soybean Meal	026
Other (Specify)	XXX		
Other Agricultural	A90		
Other Financial Instruments	F90		
Petroleum And Products	N10	Jet Fuel	262
Petroleum And Products	N10	Ethanol	025
Petroleum And Products	N10	Biodiesel	036
Petroleum And Products	N10	Fuel Oil	021

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Commodity Group Name	Commodity Group Code	Individual Commodity Name	Individual Commodity Code
Petroleum And Products	N10	Heatingoil-Diesel-Gasoil	022
Petroleum And Products	N10	Gasoline	111
Petroleum And Products	N10	Naphtha	032
Petroleum And Products	N10	Crude Oil	067
Petroleum And Products	N10		
Plastics	N50		
Precious Metals	N20	Palladium	075
Precious Metals	N20	Platinum	076
Precious Metals	N20	Silver	084
Precious Metals	N20	Gold	088
Real Estate	E10		
Weather	N70		
Wood Products	N30	Lumber	058
Wood Products	N30	Pulp	069

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Supplemental List III: List of Business Purposes of Commodity Derivatives Trading

Business Purpose Code	Business Purpose Name	Business Purpose Description	Business Purpose Example
11	Offsetting Cash or Spot Market Input Price Risk	Using derivative markets for commodities that are direct inputs or purchases for your business so as to offset price risk associated with your purchase of these inputs	You are a grain processor, so you use wheat futures to offset the price risk incidental to your cash purchases of wheat
12	Offsetting Cash or Spot Market Output Price Risk	Using derivative markets for commodities that are direct outputs or sales of your business so as to offset price risk associated with your sale of these outputs	You are a gasoline refiner, so you use gasoline futures to offset price risk associated with your production of gasoline
13	Offsetting Other Cash or Spot Market Price Risks (Cross Price Risk)	Using derivative markets for a commodity that is not a direct input or output of your business, but which has significant price correlations with the direct inputs or outputs of your business	You manufacture ethanol which is used as an additive in and competitor for gasoline as a combustive fuel. While you neither directly consume nor produce gasoline, you may find that the price you receive for your ethanol product is highly correlated with the price of gasoline, and therefore you reduce ethanol price risk by using gasoline futures contracts
14	Other Physical Risk Management Strategies	Managing other price risks incidental to the operation of your business or physical assets through the use of commodity derivative markets	You are a manufacturer with significant international sales, so you use foreign currency futures to offset risks associated with changes in the competitiveness of your exports and therefore the value of your physical assets such as production plants, land, machinery, etc
15	Client Futures/Options Trading	Fulfilling customer/client desire for portfolio diversification or exposure to	You collect funds and execute trading strategies through the use of futures/options

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Business Purpose Code	Business Purpose Name	Business Purpose Description	Business Purpose Example
		various asset classes through your activity as a Commodity Pool Operator, Commodity Trading Advisor, or other similar role	markets at the expressed intent and for the sole benefit of clients
16	Managing Client Swaps Exposure	Reducing risk stemming from holding or executing swaps contracts on behalf of clients or customers through the use of futures/options markets	You sell crude oil swaps to a client and agree to accept the risk inherent in the index price. You offset this risk through purchases of crude oil futures, in effect transferring price risk from the client to another market participant
17	Making Markets/Providing Liquidity	Engaging in derivatives transactions to assume risk and help transfer ownership of derivative positions from one market participant to another, realizing the bidask spread as the return	You accept risk by buying and selling futures/options contracts so that other traders can move into and out of positions when they wish. You then find other traders willing to take the other side of those transactions
18	Arbitrage	Using derivative markets as part of a strategy designed to realize risk-free profit from pricing anomalies	You realize that the wheat futures contract is trading at a discount (even after considering storage, transport, etc.) relative to the wheat cash price, and therefore find it profitable to purchase the wheat futures contract, take delivery, and then resell the wheat in the cash market for a risk-free profit
19	Establishing Price Exposure	Using derivative markets as a way to express your belief in the future movement of market prices. This strategy does not involve offsetting risks incidental to your business, but instead involves directional trading	You conduct research and believe that crude oil prices are due to rise, so you take long futures positions in crude oil to profit from your predictions

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Business Purpose Code	Business Purpose Name	Business Purpose Description	Business Purpose Example
20	Financial Asset Management	Using derivatives to diversify, rebalance, or otherwise allocate financial assets so that risks to the value of the investment portfolio are reduced. This strategy is used by entities such as pension funds and endowments to manage overall risk to their financial portfolios	You hold Treasury bonds as a component of your investment portfolio, and use futures contracts to reduce overall portfolio risk that would result from falling bond prices
21	Managing Proprietary Swaps	Reducing risk stemming from your	You trade interest rate swaps as part of your
	Exposure	proprietary holding or execution of swaps contracts through the use of futures/options markets	business or investment strategy, and offset some of the risk inherent in those swaps through your use of Eurodollar futures markets
22	Other: Specify	List and explain your business purpose if the above categories do not adequately describe the reason you trade in a particular commodity derivative market	

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