

# CTA

## Consolidated Tape Association

### CTA Multiple Installations for Single Users (MISU) Policy

The CTA's Multiple Installation for Single Users (MISU) policy sets forth the terms and conditions wherein a single "device fee" shall apply in respect of individual professional users receiving multiple display device services entitled for real-time CTA Network A and/or CTA Network B data.

**In such cases, NYSE will charge for a single device, provided the following requirements are met:**

1. The firm must complete the [MISU Application Form](#). This must be completed, submitted to and approved by NYSE before a firm can qualify. The document can be found on our website [www.nyxdata.com](http://www.nyxdata.com).
2. The firm must have the ability to produce a report showing the total number of CTA Network A and/or CTA Network B-entitled devices at each MISU location, and the number of CTA Network A and/or CTA Network B-entitled devices (by vendor) on a user-by-user basis. **Reports should be in the exact format as outlined by NYSE (see sample below).** NYSE will reconcile the firm's MISU report against vendor reporting.
3. The firm must submit their MISU report by the 20<sup>th</sup> day of the month for the month which they are requesting credits. **Any report submitted after this date will not be accepted and credit is forfeited for that month.**
4. The firm should only submit MISU reports for locations directly corresponding with vendor reporting.
5. Vendor Account Numbers (VAN's) corresponding to MISU locations **must** be included in the MISU report.
6. Firm employees with a single device (at each MISU location) **must** be included in the report.
7. No MISU adjustments will be granted to accounts with a third-party billing relationship.
8. MISU adjustments will not be issued retroactively for late or non-reporting.
9. All firms participating in the MISU Program will be subject to an annual audit at the firm's expense. If you are participating MISU for both CTA Network A and CTA Network B, the audit should address both data sources.
10. Each firm participating in MISU must be in good standing with NYSE (i.e. reporting must be up to date, account balance must be current).

#### **Audit Requirements / Compliance:**

The purpose of the audit is to certify and ensure **each phase** of the MISU process (e.g., collection of end user information, data input/storage and the output of data into a report) has been performed in compliance with NYSE policies and procedures. Any and all variances must be explained in detail.

NYSE requires that an audit be conducted within the first ninety (90) days of the first issuance of MISU credits. The initial audit should examine the first month of MISU credits requested. Thereafter, an annual audit is required and must be submitted by December 31<sup>st</sup> of each year. The audit should cover review of any consecutive four (4) month period. **NYSE reserves the right to request an audit at any time.**

The firm performing the audit must be approved by NYSE. Broker/dealers, registered investment advisor and banks may use internal audit departments to conduct their audit, so long as the audit and its findings are signed by the Chief Compliance Officer of the firm, a member of the firm's Audit Committee or an individual deemed acceptable by NYSE. Results of the audit should be sent to the NYSE account manager approving the arrangement.

**The audit should cover the following and explain the verification procedure for each step:**

1. Explain how end-user information was compiled and entered (e.g., manually, file upload, etc.) into the database. Verify that this process was performed without exception.
2. Verify that the firm has the ability to produce a report showing the total number of CTA Network A and / or CTA Network B entitled devices (by vendor) at each MISU location.

3. Verify that this report shows all CTA Network A and/or CTA Network B-entitled devices (by vendor) on a user-by-user basis.
4. Verify that the firm controls simultaneous access by the same user ID. ***This only applies in cases where firms are redistributing data internally.***
5. Verify that the firm has only submitted MISU reports for locations directly corresponding with vendor reporting.
6. Verify that the matrix of users and entitled vendor devices submitted shows the total number of vendor devices per MISU location.
7. Verify that firm employees with a single device were included in the reports.
8. Verify that credits requested by the customer were valid. Confirm that users had access to CTA Network A and/or CTA Network B data from more than one market data service.
9. If a database is being used, validate that the system has the ability to generate monthly reports showing the total number of individuals with access to CTA Network A and/or CTA Network B data at each location.
10. If the MISU report contains information that has been uploaded electronically, verify that the end-user information was uploaded without exception. Vendor files should be archived for at least three (3) years.
11. If information in the MISU report is gathered manually (e.g., reconciliation of vendor invoices), verify that the information was properly entered into the database. Vendor invoices should be archived for at least three (3) years.
12. Verify that individuals on the MISU report (e.g., John Smith) were employees of the firm in the month the report was submitted.
13. The audit report should indicate the period reviewed.

Failure to comply with the NYSE's MISU audit policy will result in the cancellation of a firm's MISU arrangement and its eligibility to receive future credits. Moreover, NYSE reserves the right to reinstate original charges should any improprieties/discrepancies arise which are deemed non-compliant.

#### **Additional Information:**

- There is no minimum number of users needed to qualify for MISU. However, based on the scope of the audit requirements and the tiered pricing schedule for CTA Network A, it may not be cost-effective for firms with a lower number of MISU eligible display devices. Please refer to the audit requirements and the CTA Rate Schedule for further information. You may also contact your NYSE account manager for more details. If there are any questions please email [NYSE-MarketDataAccountManagement@TheIce.com](mailto:NYSE-MarketDataAccountManagement@TheIce.com) .
- MISU credits will not be processed for any months prior to approval of the MISU Application Form and the report format.
- If any firm claims and receives Administrative Usage Credits, as per the CTA Administrative Usage Policy, and that firm subsequently reports the same administrative VAN(s) within a MISU file, any Administrative Usage Credits that were received on those administrative VAN(s) will be deducted from any resulting MISU credit.
- No MISU credit will be issued for a location until the Vendor's monthly reporting for that location reconciles with the firm's MISU report for that same location. ***Any discrepancies must be addressed by the firm directly with the vendor, and adjustments will not be issued until the discrepancy is resolved. Credits will not be issued retroactively for late reporting.***

• **Sample MISU Report**

NYSE will process the MISU report using an automated system to reconcile your MISU request against your vendor’s reporting.

In order for the report to reconcile against this system, the report must be in the following format:

1. File name format: “Account ID(10 digit)\_Account Name(Up to 10 characters)\_MISU\_ mmyy.xlsx”
2. Cell B2: Your NYSE account ID in text format (10 digit)
3. Cell B3: MISU report effective date: mm/dd/yyyy [Day must be 01 (i.e. 07/01/2016)]
4. Row 5: Vendor Account Numbers

**1** Example File name:”1234500000\_ABCCorp\_MISU\_0716.xlsx.”

	A	B	C	D	E	F	G	H
1	Company Name:	ABC Corp						
2	NYSE Account #	1234500000						
3	Month (mm/dd/yyyy)	07/01/2016						
4	<b>VENDOR'S NAME</b>	<b>SERVICE</b>	Thomson Reuters	Thomson Reuters	Bloomberg	Bloomberg	FactSet	Activ
5	<b>VENDOR ACCOUNT NUMBER</b>		RTRS-A-AABBCC	RTRS-ABC 123	BLI-012340001	BLI-012340002	FACRES-123456	ACTIV-123456
6	<b>GREENWICH, CT</b>							
7	DOE, JOHN	Network A	1	1				
8	DOE, JOHN	Network B	1	1				
9	DOE, JANE	Network A	2	1				
10	DOE, JANE	Network B	1	1				
11	SMITH, JANE	Network A	2					
12	SMITH, JANE	Network B	3					
13	PETERS, MARY	Network A	2	2				
14	PETERS, MARY	Network B	1	2				
15	<b>CHICAGO, IL</b>							
16	BLAINE, JOE	Network A			1	2		
17	BLAINE, JOE	Network B			2	2		
18	SIMMS, FRANK	Network A			1	1		
19	SIMMS, FRANK	Network B			2	1		
20	JAMES, JOHN	Network A			1	1		
21	JAMES, JOHN	Network B			1	1		
22	<b>CHICAGO, IL</b>							
23	KIM, DAVID	Network A					1	1
24	KIM, DAVID	Network B					2	1
25	LYNN, MARY	Network A					3	1
26	LYNN, MARY	Network B					1	1
27	DOBBS, KIM	Network A					1	2
28	DOBBS, KIM	Network B					1	1

• **Reasons for file validation errors:**

- An extra line was added (usually between the Date (line3) and the Vendor name (line 4))-See “Sample MISU Report” on page 3 of MISU policy)
- The date was not populated in US text format: mm/dd/yyyy
- Hyphens were omitted from the Vendor Account Numbers (VANS) (i.e. ABC-1234)
- VANS appear more than once within the file
- VANS on MISU report do not exist in NYSE’s system
- An incorrect vendor prefix
- The number of users is presented as a decimal (i.e. .25) , whole numbers must be included
- Services under Column B must be:
  - “Network A” for CTA NETWORK A-DVCS
  - “Network B” for CTA NETWORK B-DVCS
- Columns and rows should not have summed totals
- MISU report should be on a single page Excel spreadsheet
- A single user is listed under multiple locations under the same VAN

## MISU FAQ's

### 1. What is MISU?

The Multiple Installation for Single Users (MISU) policy issues credits for display device fees when an individual professional user receives multiple display services entitled for real-time either CTA Network A data or CTA Network B data.

### 2. How does a firm apply for MISU?

A firm can apply for MISU by completing the MISU Application Form.

### 3. Who is eligible to receive MISU credits?

Only employees of the firm (who receive a **W-2** Wage and Tax Statement) are eligible to receive MISU credits. **K-1** statement recipients are not eligible to receive MISU credits.

### 4. Is there a minimum requirement in order to qualify for MISU?

No. However, based on the scope of the audit requirements and the tiered pricing schedule, it may not be cost-effective for firms with a lower number of MISU eligible display devices.

### 5. Can I apply for MISU credits if my account has a third-party billing relationship?

No, MISU credits will not be granted to accounts with a third-party billing relationship.

### 6. What documents would I need to apply for MISU?

One copy of the MISU Application Form must be completed and approved before a firm can qualify for MISU. Both documents can be found on our website: [www.nyxdata.com](http://www.nyxdata.com).

### 7. How is the number of credits determined?

Information (locations, users, quantities, vendor services, etc.) from the MISU report is reconciled against vendor reporting information. In the event the information does not reconcile, no credits will be issued until the discrepancy is resolved. NYSE has sole discretion over the number of MISU credits issued for each location.

### 8. When should I expect to see the credit adjustment?

Credits should be reflected on the following months invoice.

### 9. Can credits be issued retroactively?

No. Credits will not be issued retroactively.

### 10. Could the credits issued be less (in dollar amounts) than what was requested?

Yes. The quantity/location information may not reconcile with what the vendor is reporting. Also, the tiered pricing schedule allows for a volume weighted discount. Depending on the number of credits earned, a firm may fall into a higher tier resulting in an increase in the per device rate.

### 11. Can I include any Administrative Usage vendor account numbers in my MISU file?

Yes. If any Administrative Usage VAN(s) is included in a MISU file, then any Administrative Usage Credits received by that VAN(s) under the CTA Administrative Usage Policy, will be deducted from any credit(s) the administrative VAN(s) may receive as a result of its inclusion in the MISU file.

### 12. Who may perform the audit?

Broker/dealers and banks may use internal audit departments to conduct their audit, so long as the audit and its findings are signed by the Chief Compliance Officer of the firm, a member of the firm's Audit Committee or an individual deemed acceptable by NYSE. Also, an external auditor may perform the audit with prior NYSE approval.

### 13. Who may not perform the audit?

External firms / auditors, or a customer's own auditing group that has prepared a MISU submission for the customer during the time period covered by the Annual Audit may not conduct the Annual Audit.

### 14. Can a firm's MISU arrangement be cancelled?

Yes. At any time, NYSE reserves the right to cancel any participating firms MISU arrangement for failure to comply with the MISU policy. A condition of participation requires the firm to be current with NYSE's invoices. If a firm has at least 2 outstanding invoices or any invoice that is past 90 days due, MISU participation may be suspended and credits during that period will be forfeited.

**15. Are individuals with a single device eligible for MISU?**

No. Firm employees with a single, billable device are not eligible but must be included in the MISU report.

**16. What if I don't have an NYSE account manager?**

If a firm has questions please email [NYSE-MarketDataAccountManagement@TheIce.com](mailto:NYSE-MarketDataAccountManagement@TheIce.com) .

**17. When should the MISU report be submitted by?**

The firm must submit their MISU report by the 20<sup>th</sup> day of the month for the month which they are requesting credits. For example, if you are requesting MISU credits for the month of May, the MISU report should be submitted by May 20<sup>th</sup>.

***MISU report must be submitted to: MISU@TheIce.com***

***Any report submitted after this date will not be accepted and credits are forfeited for that month.***

**NOTE:** This fact sheet is a summary document intended to set forth the highlights of CTA/CQ policy, rates, and procedures. Questions and/or circumstances not covered in this document should be referred to NYSE for the determination of applicable fees and procedures.

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