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

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## Ownership and Control Reports

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

Technical Guidance Document

May 25, 2016

Version [45.1](#)

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# CFTC

**Commodity Futures Trading  
Commission**

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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

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	ORGTTYPE 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.
<b>3</b>		
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
<b>4</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

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	<a href="#">4/13/2016</a>	<a href="#">Added optional tracking identifier field on filename. See "Name the File(s) for XML submission"</a>
5	<a href="#">4/13/2016</a>	<a href="#">Added footnote reference for countries that do not have a zip code. See, e.g., row 12 in the Form 102 cover sheet schema</a>
5	<a href="#">4/13/2016</a>	<a href="#">Fixed erroneous XML reference for Volume Threshold trading account number. See row 2 of Form 102B schema</a>
5	<a href="#">4/13/2016</a>	<a href="#">Modified various contact fields related to trading account controller as optional on Question 10(iii) of Form 102A.</a>
5	<a href="#">4/13/2016</a>	<a href="#">Modified various contact fields related to trading account controller as optional on Question 6 of Form 102B.</a>
5	<a href="#">4/13/2016</a>	<a href="#">Added ClientReportingIssue attribute to identify data reporting quality for trading account controller fields on the Form 102A and Form 102B. See, e.g., row 143 of Form 102A schema</a>
5	<a href="#">4/13/2016</a>	<a href="#">Added isCounterparty attribute to identify the entity who is the counterparty on the Form 102S. See row 29 of Form 102S schema</a>
5	<a href="#">4/13/2016</a>	<a href="#">Added foreignPrivacyException attribute to identify contact fields that are covered by foreign privacy-protection laws. See row 31 of Form 102S schema</a>
5.1	<a href="#">5/24/2016</a>	<a href="#">Updated correct fields that use the foreignPrivacyException attribute covered by foreign privacy-protection laws.</a>

## 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 link<sup>1</sup> to view the OCR Final Rule on the Federal Register; visit this link<sup>2</sup> 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](mailto: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:<sup>3</sup>

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<sup>1</sup> <https://www.federalregister.gov/articles/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71>

<sup>2</sup> <http://www.cftc.gov/ucm/groups/public/@lrfederalregister/documents/file/2013-26789a.pdf>

<sup>3</sup> See preceding Introduction for information regarding guidance on the Portal.

## CFTC Secure FTP

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](mailto:OCRTechSupport@cftc.gov) to verify the results of test data you have submitted.

### **FORMNUMBER:**

<b>Form Number Submitted in File</b>	<b>FORMNUMBER in File Name</b>
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.

### 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	E

### 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.winzip.com>, 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](http://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](mailto: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.

### **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.

## Data Dictionary for OCR Batch Header

	<b>Data Dictionary for OCR Batch Header-Data Element</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
1.	Message Transmit Datetime	Yes	Date of OCR Batch Submission	The format is <b>YYYY-MM-DDThh:mm:ss[+ -]hh:mm</b> , 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

	<b>Data Dictionary for OCR Batch Header-Data Element</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
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

	<b>Data Dictionary for Form 102 Cover Sheet-Data Element</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
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

	<b>Data Dictionary for Form 102 Cover Sheet-Data Element</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			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 <sup>4</sup>	Y = Yes N = No	cftcBatch/cftcForm102@FollowOnInformationToCome
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	Y = Yes N = No	cftcBatch/cftcForm102@OptionalOrSuppFieldsSeparatelyReported

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<sup>4</sup> 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.

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

	<b>Data Dictionary for Form 102 Cover Sheet-Data Element</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
10.	Reporting Firm State	Conditional. Required if OptionalOrSuppFieIdsSeparatelyReported = '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 OptionalOrSuppFieIdsSeparatelyReported = '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 OptionalOrSuppFieIdsSeparatelyReported = 'N' <sup>5</sup>	Zip code or postal code of the reporting entity		cftcBatch/cftcForm102@postalCode
13.	Reporting Firm Contact Natural Person Last Name	Conditional. Required if OptionalOrSuppFieIdsSeparatelyReported = 'N'	Surname of the natural person who is a contact at the reporting entity		cftcBatch/cftcForm102/contact@lastName
14.	Reporting Firm Contact	Conditional. Required if	Given or first in order name of the		cftcBatch/cftcForm102/contact@firstName

<sup>5</sup> [For countries that do not have a zip/postal code, the postalCode attribute is not required](#)

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

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

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

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<sup>6</sup> 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).

	<b>Data Dictionary for Form 102 Cover Sheet-Data Element</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
27.	Reporting Firm Type – Other	Conditional. Required if OptionalOrSuppFieIdsSeparatelyReported = '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 OptionalOrSuppFieIdsSeparatelyReported = 'N'	The alpha-numeric identifier assigned by the Commission to the reporting entity		cftcBatch/cftcForm102@reportingIdentifier

## Data Dictionary for Form 102A – Identifying and reporting a special account<sup>7</sup>

	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: <ul style="list-style-type: none"> <li>• Special account being reported for the first time</li> <li>• Re-submitted or modified</li> </ul>	N = New M = Modified	cftcBatch/cftcForm102@informationType

<sup>7</sup> 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>

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
				Information for a previously reported special account		
<b>2.</b>	Special Account Origination	Question 2	Yes	Indicates for which of the following reasons the account is being reported	OO = Ownership of a reportable position <sup>8</sup> 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

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<sup>8</sup> '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.

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<b>3.</b>	Special Account Number	Question 3	Yes	Numeric identifier used by the reporting entity to uniquely identify a special account		cftcBatch/cftcForm102@accountNumber
<b>4.</b>	Special Account Name	Question 3	Yes	The name of the special account assigned by the reporting firm		cftcBatch/cftcForm102@accountName
<b>5.</b>	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 <sup>9</sup>	H = House C = Customer	cftcBatch/cftcForm102@accountClass
<b>6.</b>	Omnibus Account	Question 5	Conditional, if originReason='OM'	Indicates if the reported special	Y = Yes N = No	cftcBatch/cftcForm102@isOmnibus

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<sup>9</sup> See preceding footnote.

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			then 'Y' else 'N'	account is an omnibus account		
<b>7.</b>	Omnibus Account Information	Question 5	Conditional. Required if originReason='OM'	If the reported special account is an omnibus account, indicate whether the account is a house or customer omnibus account	H = House C = Customer	cftcBatch/cftcForm102@accountClass
<b>SPECIAL ACCOUNT OWNER(S) CONTACT INFORMATION</b>						
<b>8.</b>	Special Account Owner Indicator	Question 6	Conditional, if originReason='OC' then isOwner = 'Y'	Indicates reporting special account owner	Y = Yes N = No	cftcBatch/cftcForm102/relatedEntity@isOwner
<b>9.</b>	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/relatedEntity@entityType
<b>10.</b>	Special Account Owner Optional Fields or Supplemental	Question 6	Conditional. Required if originReason='OC'	Indicates that one or more "Optional Fields" or "Supplemental Fields" not included in this	Y = Yes N = No	cftcBatch/cftcForm102/relatedEntity@OptionalOrSuppFieldsSeparatelyReported

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Fields Reported to LEI Provider			question were reported to the CICI Utility (or other CFTC-approved LEI provider) and are associated with the LEI provided in this submission		
<b>IF SPECIAL ACCOUNT OWNER IS A LEGAL ENTITY</b>						
<b>11.</b>	Special Account Owner Legal Entity Name	Question 6	Conditional. Required if originReason='OC' AND OptionalOrSuppFieldsSeparatelyReported='N' AND entityType='LE'	Legal or registered name of the reportable account owner		cftcBatch/cftcForm102/relatedEntity@legalEntityName
<b>IF SPECIAL ACCOUNT OWNER IS A NATURAL PERSON</b>						
<b>12.</b>	Special Account Owner Natural Person Last Name	Question 6	Conditional. Required if originReason='OC' AND OptionalOrSuppFieldsSeparatelyReported='N' AND entityType='LE'	Surname of the natural person reportable account owner		cftcBatch/cftcForm102/relatedEntity@lastName

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			IdsSeparatelyReported='N' And entityType='NP'			
<b>13.</b>	Special Account Owner Natural Person First Name	Question 6	Conditional. Required if originReason='OC' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND entityType='NP'	Given or first in order name of the natural person reportable account owner		cftcBatch/cftcForm102/relatedEntity@firstName
<b>14.</b>	Special Account Owner Natural Person Middle Name	Question 6	Conditional. Required if information is available AND originReason='OC' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND entityType='NP'	Middle name of the natural person reportable account owner		cftcBatch/cftcForm102/relatedEntity@middleName
<b>15.</b>	Special Account Owner Natural Person Suffix	Question 6	Conditional. Required if information is available AND	Suffix of the natural person reportable account owner		cftcBatch/cftcForm102/relatedEntity@nameSuffix

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			originReason='OC' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N' AND entityType='NP'			
<b>FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS</b>						
16.	Special Account Owner Street Address	Question 6	Conditional. Required if originReason='OC' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N'	Street address of the reportable account owner		cftcBatch/cftcForm102/relatedEntity@street
17.	Special Account Owner Suite	Question 6	Conditional. Required if information available AND originReason = 'OC' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N'	Suite of the reportable account owner		cftcBatch/cftcForm102/relatedEntity@suite
18.	Special Account	Question 6	Conditional. Required if	City of the reportable account		cftcBatch/cftcForm102/relatedEntity@city

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Owner City		originReason='OC' AND OptionalOrSuppFie ldsSeparatelyRepor ted ='N'	owner		
<b>19.</b>	Special Account Owner State	Question 6	Conditional. Required if originReason='OC' AND OptionalOrSuppFie ldsSeparatelyRepor ted ='N'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/relatedEntity@state
<b>20.</b>	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/relatedEntity@country
<b>21.</b>	Special Account Owner Zip/Postal Code	Question 6	Conditional. Required if originReason='OC' AND OptionalOrSuppFie ldsSeparatelyRepor ted ='N'	Zip/Postal code of the reportable account owner		cftcBatch/cftcForm102/relatedEntity@postalCode

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

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Owner Contact First Name		originReason='OC' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N'	the owner		
<b>26.</b>	Special Account Owner Contact Middle Name	Question 6	Conditional. Required if information is available AND originReason='OC' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Middle name of the contact person for the owner		cftcBatch/cftcForm102/relatedEntity/contact@middleName
<b>27.</b>	Special Account Owner Contact Name Suffix	Question 6	Conditional. Required if information is available AND originReason='OC' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Suffix of the contact person for the owner		cftcBatch/cftcForm102/relatedEntity/contact@nameSuffix

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			ted = 'N'			
<b>28.</b>	Special Account Owner Contact Job Title	Question 6	Conditional. Required if originReason='OC' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N'	Job title of the contact person for the owner		cftcBatch/cftcForm102/relatedEntity/contact@titleOrPosition
<b>29.</b>	Contact Relationship to Special Account Owner	Question 6	Conditional. Required if originReason='OC' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N'	Contact relationship to the owner		cftcBatch/cftcForm102/relatedEntity/contact@relationship
<b>30.</b>	Special Account Owner Contact Phone Number	Question 6	Conditional. Required if originReason='OC' AND entityType='LE' AND	Phone number of the contact person for the owner		cftcBatch/cftcForm102/relatedEntity/contact@telephone

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			OptionalOrSuppFieIdsSeparatelyReported='N'			
31.	Special Account Owner Contact Email Address	Question 6	Conditional. Required if originReason='OC' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Email address of the contact person for the owner		cftcBatch/cftcForm102/relatedEntity/contact@email
<b>FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS</b>						
32.	Special Account Owner Website	Question 6	Conditional. Required if information available AND originReason='OC' AND OptionalOrSuppFieIdsSeparatelyReported='N'	URL of the owner's website		cftcBatch/cftcForm102/relatedEntity@website
33.	Special Account Owner NFA ID	Question 6	Conditional. Required if information available AND	The identification number given to the ownership entity by the		cftcBatch/cftcForm102/relatedEntity@NFAIdentifier

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			originReason='OC' AND OptionalOrSuppFieIdsSeparatelyReported='N'	National Futures Association		
<b>34.</b>	Special Account Owner Legal Entity Identifier (LEI)	Question 6	Conditional. Required if information available AND originReason='OC' AND OptionalOrSuppFieIdsSeparatelyReported='Y'	The legal entity identifier (LEI) assigned to the ownership entity by the LEI issuer		cftcBatch/cftcForm102/relatedEntity@legalEntityIdentifier
<b>SPECIAL ACCOUNT CONTROLLER(S) CONTACT INFORMATION<sup>10</sup></b>						

<sup>10</sup> 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.

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
35.	Special Account Controller Indicator	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' then isController = 'Y'	Indicates reporting special account controller	Y = Yes N = No	cftcBatch/cftcForm102/relatedEntity@isController
36.	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/relatedEntity@entityType
37.	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 LEI provided in this submission	Y = Yes N = No	cftcBatch/cftcForm102/relatedEntity@OptionalOrSuppFieldsSeparatelyReported

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<b>IF SPECIAL ACCOUNT CONTROLLER IS A LEGAL ENTITY</b>						
38.	Special Account Controller Legal Entity Name	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N'	Legal or registered name of the reportable account Controller		cftcBatch/cftcForm102/relatedEntity@legalEntityName
<b>IF SPECIAL ACCOUNT CONTROLLER IS A NATURAL PERSON</b>						
39.	Special Account Controller Natural Person Last Name	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType='NP' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N'	Surname of the natural person reportable account Controller (if natural person)		cftcBatch/cftcForm102/relatedEntity@lastName

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<b>40.</b>	Special Account Controller Natural Person First Name	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType='NP' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Given or first in order name of the natural person reportable account Controller		cftcBatch/cftcForm102/relatedEntity@firstName
<b>41.</b>	Special Account Controller Natural Person Middle Name	Question 7	Conditional. Required if information available AND originReason = 'OC' OR originReason = 'CC' AND entityType='NP' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Middle name of the natural person reportable account Controller		cftcBatch/cftcForm102/relatedEntity@middleName
<b>42.</b>	Special Account Controller	Question 7	Conditional. Required if information	Suffix of the natural person reportable account		cftcBatch/cftcForm102/relatedEntity@nameSuffix

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Natural Person Suffix		available AND originReason = 'OC' OR originReason = 'CC' AND entityType='NP' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N'	Controller		
<b>FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS</b>						
<b>43.</b>	Special Account Controller Street Address	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N'	Street address of the reportable account Controller		cftcBatch/cftcForm102/relatedEntity@street
<b>44.</b>	Special Account Controller Suite	Question 7	Conditional. Required if information available AND originReason = 'OC' OR	Suite of the reportable account Controller		cftcBatch/cftcForm102/relatedEntity@suite

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			originReason = 'CC' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'			
<b>45.</b>	Special Account Controller City	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	City of the reportable account Controller		cftcBatch/cftcForm102/relatedEntity@city
<b>46.</b>	Special Account Controller State	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/relatedEntity@state
<b>47.</b>	Special Account Controller Country	Question 7	Conditional. Required if originReason = 'OC' OR	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/relatedEntity@country

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			originReason = 'CC' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'			
<b>48.</b>	Special Account Controller Zip/Postal Code	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Zip/Postal code of the reportable account Controller		cftcBatch/cftcForm102/relatedEntity@postalCode
<b>49.</b>	Special Account Controller Phone Number	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Phone Number of the reportable account Controller		cftcBatch/cftcForm102/relatedEntity@telephone
<b>50.</b>	Special Account Controller Email Address	Question 7	Conditional. Required if originReason = 'OC' OR	Email address of the reportable account Controller		cftcBatch/cftcForm102/relatedEntity@email

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			originReason = 'CC' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N'			
<b>IF SPECIAL ACCOUNT CONTROLLER IS A LEGAL ENTITY</b>						
51.	Special Account Controller Contact Last Name	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N'	Surname of the natural person contact for the Controller		cftcBatch/cftcForm102/relatedEntity/contact@lastName
52.	Special Account Controller Contact First Name	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType='LE'	First name of the natural person contact for the Controller		cftcBatch/cftcForm102/relatedEntity/contact@firstName

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N'			
<b>53.</b>	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'	Middle name of the contact person for the Controller		cftcBatch/cftcForm102/relatedEntity/contact@middleName
<b>54.</b>	Special Account Controller Contact Name Suffix	Question 7	Conditional. Required if information is available AND originReason='OC' OR originReason = 'CC' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N'	Suffix of the contact person for the Controller		cftcBatch/cftcForm102/relatedEntity/contact@nameSuffix

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
55.	Special Account Controller Contact Job Title	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType=' LE' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N'	Job title of the contact person for Controller entity		cftcBatch/cftcForm102/relatedEntity/contact@titleOrPosition
56.	Contact Relationship to Special Account Controller	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType=' LE' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N'	Contact relationship to the controller		cftcBatch/cftcForm102/relatedEntity/contact@relationship
57.	Special Account Controller Contact Phone	Question 7	Conditional. Required if originReason = 'OC' OR	Phone number of the contact person for the Controller entity		cftcBatch/cftcForm102/relatedEntity/contact@telephone

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Number		originReason = 'CC' AND entityType=' LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N'			
<b>58.</b>	Special Account Controller Contact Email Address	Question 7	Conditional. Required if originReason = 'OC' OR originReason = 'CC' AND entityType=' LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted = 'N'	Email address of the contact person for the Controller entity		cftcBatch/cftcForm102/relate dEntity/contact@email
<b>59.</b>	Special Account Controller Website	Question 7	Conditional. Required if information available AND originReason = 'OC' OR originReason = 'CC' AND	URL of the Controller's website		cftcBatch/cftcForm102/relate dEntity@website

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			OptionalOrSuppFieIdsSeparatelyReported = 'N'			
<b>60.</b>	Special Account Controller NFA ID	Question 7	Conditional. Required if information available AND originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFieIdsSeparatelyReported='N'	The identification number given to the Controller entity by the National Futures Association		cftcBatch/cftcForm102/relatedEntity@NFAIdentifier
<b>61.</b>	Special Account Controller Legal Entity Identifier (LEI)	Question 7	Conditional. Required if information available AND originReason = 'OC' OR originReason = 'CC' AND OptionalOrSuppFieIdsSeparatelyReported='Y'	The legal entity identifier (LEI) assigned to the Controller entity by the LEI issuer		cftcBatch/cftcForm102/relatedEntity@legalEntityIdentifier
<b>OMNIBUS ACCOUNT ORIGINATOR CONTACT INFORMATION</b>						

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
62.	Omnibus Account Originator Indicator	Question 8	Conditional. Required if originReason = 'OM' Then isOriginator='Y'	Indicates reporting special account originator	Y = Yes N = No	cftcBatch/cftcForm102/relatedEntity@isOriginator
63.	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/relatedEntity@OptionalOrSuppFieldsSeparatelyReported
64.	Omnibus Account Originator Entity Type	Question 8	Yes, entityType='LE'		LE = Legal Entity	cftcBatch/cftcForm102/relatedEntity@entityType
65.	Omnibus Account Originator Name	Question 8	Conditional. Required if originReason='OM' AND	Legal name of the reportable account Originator		cftcBatch/cftcForm102/relatedEntity@legalEntityName

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			OptionalOrSuppFieIdsSeparatelyReported='N' AND entityType='LE'			
<b>66.</b>	Omnibus Account Originator Street Address	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Street address of the reportable account Originator		cftcBatch/cftcForm102/relatedEntity@street
<b>67.</b>	Omnibus Account Originator Suite	Question 8	Conditional. Required if information available AND originReason='OM' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Suite of the reportable account Originator		cftcBatch/cftcForm102/relatedEntity@suite
<b>68.</b>	Omnibus Account Originator City	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFieIdsSeparatelyReported='N'	City of the reportable account Originator		cftcBatch/cftcForm102/relatedEntity@city

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
69.	Omnibus Account Originator State	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/relate dEntity@state
70.	Omnibus Account Originator Country	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/relate dEntity@country
71.	Omnibus Account Originator Zip/Postal Code	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N'	Zip/Postal code of the reportable account Originator		cftcBatch/cftcForm102/relate dEntity@postalCode
72.	Omnibus Account Originator Phone Number	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFie IdsSeparatelyRepor ted='N'	Phone Number of the reportable account Originator		cftcBatch/cftcForm102/relate dEntity@telephone

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
73.	Omnibus Account Originator Contact Last Name	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Surname of the natural person contact for the Originator		cftcBatch/cftcForm102/relatedEntity/contact@lastName
74.	Omnibus Account Originator Contact First Name	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFieIdsSeparatelyReported='N'	First name of the natural person contact for the Originator		cftcBatch/cftcForm102/relatedEntity/contact@firstName
75.	Omnibus Account Originator Contact Middle Name	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Middle name of the natural person contact for the Originator		cftcBatch/cftcForm102/relatedEntity/contact@middleName
76.	Omnibus Account Originator Contact Suffix	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Suffix of the natural person contact for the Originator		cftcBatch/cftcForm102/relatedEntity/contact@nameSuffix

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
77.	Omnibus Account Originator Contact Job Title	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Job title of the contact person at or related to the Originator entity		cftcBatch/cftcForm102/relatedEntity/contact@titleOrPosition
78.	Contact Relationship to Omnibus Account Originator	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Contact relationship to the Originator entity		cftcBatch/cftcForm102/relatedEntity/contact@relationship
79.	Omnibus Account Originator Contact Phone Number	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Phone number of the contact person for the Originator entity		cftcBatch/cftcForm102/relatedEntity/contact@telephone
80.	Omnibus Account Originator Contact Email Address	Question 8	Conditional. Required if originReason='OM' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Email address of the contact person for the Originator entity		cftcBatch/cftcForm102/relatedEntity/contact@email

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<b>81.</b>	Omnibus Account Originator Website	Question 8	Conditional. Required if information available AND originReason='OM' AND OptionalOrSuppFieIdsSeparatelyReported='N'	URL of the Originator's website		cftcBatch/cftcForm102/relatedEntity@website
<b>82.</b>	Special Account Originator NFA ID	Question 8	Conditional. Required if information available AND originReason='OM' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	The identification number given to the Originator entity by the National Futures Association		cftcBatch/cftcForm102/relatedEntity@NFAIdentifier
<b>83.</b>	Omnibus Account Originator Legal Entity Identifier (LEI)	Question 8	Conditional. Required if information available AND originReason='OM' AND OptionalOrSuppFieIdsSeparatelyReported = 'Y'	The legal entity identifier (LEI) assigned to the Originator entity by the LEI issuer		cftcBatch/cftcForm102/relatedEntity@legalEntityIdentifier

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<b>IDENTIFICATION OF TRADING ACCOUNT(S) THAT COMPRISE THE SPECIAL ACCOUNT<sup>11</sup></b>						
84.	Special Account Trading Account Indicator	Question 9	Yes, isTradingAccount='Y'		Y = Yes N = No	cftcBatch/cftcForm102/relatedAccount@isTradingAccount
85.	Special Account Trading Account Number	Question 9	Conditional. Required if isTradingAccount='Y'	For each special account reported by an entity acting as a <i>clearing member</i> , provide the trading account number		cftcBatch/cftcForm102/relatedAccount@accountNumber
86.	Short Code	Question 9	Conditional. Required if isTradingAccount='Y'	For each special account reported by an entity acting as a <i>clearing member</i> , provide		cftcBatch/cftcForm102/relatedAccount/relatedAcctInfo@accountShortCode

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<sup>11</sup> 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
				the related short code		
87.	Reporting Market <sup>12</sup>	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: <a href="http://www.iso15022.org/MIC/homepageMIC.htm">http://www.iso15022.org/MIC/homepageMIC.htm</a> <sup>13</sup>	cftcBatch/cftcForm102/relatedAccount/relatedAcctInfo@marketIdentifier
<b>TRADING ACCOUNT OWNERSHIP AND CONTROL INFORMATION</b>						
<b>OMNIBUS ACCOUNT INFORMATION</b>						
88.	Trading Account Omnibus Account	Question 10i	Conditional. Required if isTradingAccount='Y'	For each trading account identified in question 9, is such account an	Y = Yes N = No	cftcBatch/cftcForm102/relatedAccount@isOmnibus

<sup>12</sup> See preceding footnote.

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

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Indicator			omnibus account		
<b>89.</b>	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/relatedAccount@accountClass
<b>90.</b>	Trading Account Omnibus Account Originator Indicator	Question 10i	Conditional, if isTradingAccount='Y' AND isOmnibus='Y' THEN isOriginator='Y'	Indicates reportable Trading Account Omnibus Account originator	Y = Yes N = No	cftcBatch/cftcForm102/relatedAccount/relatedEntity@isOriginator
<b>91.</b>	Trading Account Omnibus Account Optional Fields or	Question 10i	Conditional, if isTradingAccount='Y' AND isOmnibus='Y'	Indicates that one or more "Optional Fields" or "Supplemental Fields" not included in this	Y = Yes N = No	cftcBatch/cftcForm102/relatedAccount/relatedEntity@OptionalOrSuppFieldsSeparatelyReported

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Supplemental Fields Reported to LEI Provider			question were reported to the CICI Utility (or other CFTC-approved LEI provider) and are associated with the LEI provided in this submission		
<b>92.</b>	Trading Account Omnibus Account Entity Type	Question 10i	Yes, entityType = 'LE'		LE=Legal Entity	cftcBatch/cftcForm102/relatedAccount/relatedEntity@entityType
<b>93.</b>	Trading Account Omnibus Account Originator Name	Question 10i	Conditional. Required if isTradingAccount='Y' AND isOmnibus='Y' AND OptionalOrSuppFieldsSeparatelyReported = 'N'	Name of omnibus trading account originator		cftcBatch/cftcForm102/relatedAccount/relatedEntity@legalEntityName
<b>94.</b>	Trading Account Omnibus	Question 10i	Conditional. Required if isTradingAccount='	Street address of omnibus trading account Originator		cftcBatch/cftcForm102/relatedAccount/relatedEntity@street

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Account Originator Street Address		Y' AND isOmnibus = 'Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'			
95.	Trading Account Omnibus Account Originator Suite	Question 10i	Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus = 'Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Suite of omnibus trading account Originator		cftcBatch/cftcForm102/relatedAccount/relatedEntity@suite
96.	Trading Account Omnibus Account Originator City	Question 10i	Conditional. Required if isTradingAccount='Y' AND isOmnibus = 'Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	City of the omnibus trading account Originator		cftcBatch/cftcForm102/relatedAccount/relatedEntity@city

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			ted = 'N'			
<b>97.</b>	Trading Account Omnibus Account Originator State	Question 10i	Conditional. Required if isTradingAccount='Y' AND isOmnibus='Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/relatedAccount/relatedEntity@state
<b>98.</b>	Trading Account Omnibus Account Originator Country	Question 10i	Conditional. Required if isTradingAccount='Y' AND isOmnibus='Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/relatedAccount/relatedEntity@country
<b>99.</b>	Trading Account Omnibus Account Originator	Question 10i	Conditional. Required if isTradingAccount='Y' AND isOmnibus	Zip/Postal code of the omnibus trading account Originator		cftcBatch/cftcForm102/relatedAccount/relatedEntity@postalCode

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Zip/Postal Code		= 'Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'			
<b>100.</b>	Trading Account Omnibus Account Originator Phone Number	Question 10i	Conditional. Required if isTradingAccount='Y' AND isOmnibus='Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Phone Number of the omnibus trading account Originator		cftcBatch/cftcForm102/relatedAccount/relatedEntity@telephone
<b>101.</b>	Trading Account Omnibus Account Originator Contact Last Name	Question 10i	Conditional. Required if isTradingAccount='Y' AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Surname of the contact for the Originator		cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@lastName

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<b>102.</b>	Trading Account Omnibus Account Originator Contact First Name	Question 10i	Conditional. Required if isTradingAccount='Y' AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	First name of the contact for the Originator		cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@firstName
<b>103.</b>	Trading Account Omnibus Account Contact Middle Name	Question 10i	Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Middle name of the contact for the Originator		cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@middleName
<b>104.</b>	Trading Account	Question 10i	Conditional. Required if	Suffix of the contact for the		cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Omnibus Account Contact Suffix		information available AND isTradingAccount='Y' AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Originator		ct@nameSuffix
<b>105.</b>	Trading Account Omnibus Account Originator Contact Job Title	Question 10i	Conditional. Required if isTradingAccount='Y' AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Job title of the contact person for Originator entity		cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@titleOrPosition
<b>106.</b>	Contact Relationship to Trading Account	Question 10i	Conditional. Required if isTradingAccount='Y'	Contact relationship to the Originator entity		cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@relationship

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Omnibus Account Originator		AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'			
<b>107.</b>	Trading Account Omnibus Account Originator Contact Phone Number	Question 10i	Conditional. Required if isTradingAccount='Y' AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Phone number of the contact person for the Originator entity		cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@telephone
<b>108.</b>	Trading Account Omnibus Account Originator Contact Email Address	Question 10i	Conditional. Required if isTradingAccount='Y' AND isOmnibus='Y' AND entityType='LE'	Email address of the contact person for the Originator entity		cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@email

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N'			
<b>109.</b>	Trading Account Omnibus Account Originator Website	Question 10i	Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepor ted = 'N'	URL of the Originator's website		cftcBatch/cftcForm102/relatedAccount/relatedEntity@website
<b>110.</b>	Trading Account Omnibus Account Originator NFA ID	Question 10i	Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='Y' AND OptionalOrSuppFie	The identification number given to the Originator entity by the National Futures Association		cftcBatch/cftcForm102/relatedAccount/relatedEntity@NFAIdentifier

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			IdsSeparatelyReported='N'			
111.	Trading Account Omnibus Account Originator Legal Entity Identifier (LEI)	Question 10i	Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='Y' AND OptionalOrSuppFieIdsSeparatelyReported='Y'	The legal entity identifier (LEI) assigned to the Originator entity by the LEI issuer		cftcBatch/cftcForm102/relatedAccount/relatedEntity@legalEntityIdentifier
<b>TRADING ACCOUNT OWNER(S)</b>						
112.	Trading Account Owner Indicator	Question 10ii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' THEN isOwner='Y'	Indicates reporting <del>special</del> trading account owner	Y = Yes N = No	cftcBatch/cftcForm102/relatedAccount/relatedEntity@isOwner
113.	<u>Foreign Privacy Law Exception Indicator</u>	<u>Question 10ii</u>	<u>Conditional. Required if isOwner='Y'</u>	<u>Identifies if reported trading account owner data is covered by foreign privacy-</u>	<u>Y = Yes</u> <u>N = No</u>	<u>cftcBatch/cftcForm102/relatedAccount/relatedEntity@foreignPrivacyException</u>

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				<a href="#">protection laws</a>		
<b>113.1</b>	Trading Account Owner Type Indicator	Question 10ii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y'	Indicates whether the <del>special</del> <a href="#">trading</a> account owner is a legal entity or natural person	LE = Legal Entity NP = Natural Person	cftcBatch/cftcForm102/relatedAccount/relatedEntity@entityType
<b>114.1</b>	Trading Account Owner Optional Fields or Supplemental Fields Reported to LEI Provider	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 CICI Utility (or other CFTC-approved LEI provider) and are associated with the LEI provided in this submission	Y = Yes N = No	cftcBatch/cftcForm102/relatedAccount/relatedEntity@OptionalOrSuppFieldsSeparatelyReported
<b>IF TRADING ACCOUNT OWNER IS A LEGAL ENTITY</b>						

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<u>115.1</u>	Trading Account Owner Legal Entity Name	Question 10ii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND <u>foreignPrivacyExce ption='N'</u>	Legal or registered name of the trading account owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @legalEntityName
<b>IF TRADING ACCOUNT OWNER IS A NATURAL PERSON</b>						
<u>116.1</u>	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	Surname of the natural person trading account owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @lastName

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			IdsSeparatelyReported='N' <u>AND</u> foreignPrivacyException='N'			
<u>117.1</u>	Trading Account Owner Natural Person First Name	Question 10ii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFieIdsSeparatelyReported='N' <u>AND</u> foreignPrivacyException='N'	Given or first in order name of the natural person trading account owner		cftcBatch/cftcForm102/relatedAccount/relatedEntity@firstName
<u>118.1</u>	Trading Account Owner Middle Name	Question 10ii	Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y'	Middle name of the natural person trading account owner		cftcBatch/cftcForm102/relatedAccount/relatedEntity@middleName

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND entityType='NP' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' <u>AND</u> <u>foreignPrivacyExce</u> <u>ption='N'</u>			
<u>119.1</u>	Trading Account Owner Suffix	Question 10ii	Conditional. Required if information available AND isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' <u>AND</u> <u>foreignPrivacyExce</u> <u>ption='N'</u>	Suffix of the natural person trading account owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @nameSuffix
<b>FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS</b>						

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<del>120</del> .1	Trading Account Owner Street Address	Question 10ii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N' <u>AND</u> <u>foreignPrivacyExce ption='N'</u>	Street address of the trading account owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @street
<del>121</del> .1	Trading Account Owner Suite	Question 10ii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND FollowOnInformati	Suite of the trading account owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @suite

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			onToCome='N' <u>AND</u> foreignPrivacyException='N'			
<u>122.1</u>	Trading Account Owner City	Question 10ii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND FollowOnInformationToCome='N' <u>AND</u> foreignPrivacyException='N'	City of the trading account owner		cftcBatch/cftcForm102/relatedAccount/relatedEntity@city
<u>123.1</u>	Trading Account Owner State	Question 10ii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/relatedAccount/relatedEntity@state

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			OptionalOrSuppFieIdsSeparatelyReported='N' AND FollowOnInformationToCome='N' <u>AND</u> <u>foreignPrivacyException='N'</u>			
<u>124.1</u>	Trading Account Owner Country	Question 10ii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND FollowOnInformationToCome='N'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/relatedAccount/relatedEntity@country
<u>125.1</u>	Trading Account Owner Zip/Postal Code	Question 10ii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y'	Zip/Postal code of the trading account owner		cftcBatch/cftcForm102/relatedAccount/relatedEntity@postalCode

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N' <u>AND</u> <u>foreignPrivacyExce ption='N'</u>			
<u>126.1</u>	Trading Account Owner Phone Number	Question 10ii	Conditional. Required if isTradingAccount=' Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N' <u>AND</u> <u>foreignPrivacyExce ption='N'</u>	Phone Number of the trading account owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity @telephone
<b>IF TRADING ACCOUNT OWNER IS A NATURAL PERSON</b>						

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<del>127.1</del>	Trading Account Owner Email Address	Question 10ii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND FollowOnInformationToCome='N' <u>AND</u> <u>foreignPrivacyException='N'</u>	Email address of the trading account owner		cftcBatch/cftcForm102/relatedAccount/relatedEntity@email
<b>IF TRADING ACCOUNT OWNER IS A LEGAL ENTITY</b>						
<del>128.1</del>	Trading Account Owner Contact Last Name	Question 10ii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND	Surname of the natural person contact for the owner		cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@lastName

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N' <u>AND</u> <u>foreignPrivacyExce ption='N'</u>			
<u>129.1</u>	Trading Account Owner Contact First Name	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' <u>AND</u> <u>foreignPrivacyExce ption='N'</u>	First name of the natural person contact for the owner		cftcBatch/cftcForm102/ relatedAccount/relatedEntity/ contact@firstName

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<del>130.1</del>	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 OptionalOrSuppFieIdsSeparatelyReported='N' AND FollowOnInformationToCome='N' AND <u>foreignPrivacyException='N'</u>	Middle name of the natural person contact for the owner		cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@middleName
<del>131.1</del>	Trading Account Owner Contact Suffix	Question 10ii	Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='N'	Suffix of the natural person contact for the owner		cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@nameSuffix

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND FollowOnInformationToCome='N' <u>AND</u> <u>foreignPrivacyException='N'</u>			
<u>132.1</u>	Trading Account Owner Contact Job Title	Question 10ii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND FollowOnInformationToCome='N' <u>AND</u>	Job title of the contact person for the ownership entity		cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@titleOrPosition

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			<a href="#">foreignPrivacyException='N'</a>			
<a href="#">133.1</a>	Contact Relationship to Trading Account Owner	Question 10ii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND FollowOnInformationToCome='N' <a href="#">AND foreignPrivacyException='N'</a>	Contact relationship to the trading account owner		cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@relationship
<a href="#">134.1</a>	Trading Account Owner Contact Phone Number	Question 10ii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND	Phone number of the contact person for the ownership entity		cftcBatch/cftcForm102/relatedAccount/relatedEntity/contact@telephone

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			entityType='LE' AND OptionalOrSuppFie ldsSeparatelyRepor ted='N' AND FollowOnInformati onToCome='N' <u>AND</u> <u>foreignPrivacyExce ption='N'</u>			
<u>135.1</u>	Trading Account Owner Contact Email Address	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' <u>AND</u> <u>foreignPrivacyExce ption='N'</u>	Email address of the contact person for the ownership entity		cftcBatch/cftcForm102/ relatedAccount/relatedEntity/ contact@email

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<u>136.1</u>	Trading Account Owner Website	Question 10ii	Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND FollowOnInformationToCome='N' AND <u>foreignPrivacyException='N'</u>	URL of the owner's website		cftcBatch/cftcForm102/relatedAccount/relatedEntity@website
<u>137.1</u>	Trading Account Owner NFA ID	Question 10ii	Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieIdsSeparatelyRepor	The identification number given to the ownership entity by the National Futures Association		cftcBatch/cftcForm102/relatedAccount/relatedEntity@NFAIdentifier

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			ted='N' AND FollowOnInformationToCome='N' AND <u>foreignPrivacyException='N'</u>			
<u>138.1</u>	Trading Account Owner Legal Entity Identifier (LEI)	Question 10ii	Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieIdsSeparatelyReported='Y' AND FollowOnInformationToCome='N' AND <u>foreignPrivacyException='N'</u>	The legal entity identifier (LEI) assigned to the ownership entity by the LEI issuer		cftcBatch/cftcForm102/relatedAccount/relatedEntity@legalEntityIdentifier
<b>TRADING ACCOUNT CONTROLLER(S)</b>						
<u>139.1</u>	Trading Account	Question 10iii	Conditional, if isTradingAccount='	Indicates reporting <del>special</del> trading	Y = Yes N = No	cftcBatch/cftcForm102/relatedAccount/relatedEntity

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Controller Indicator		Y' AND isOmnibus='N' THEN isController='Y'	account Controller		@isController
<a href="#">141.</a>	<a href="#">Foreign Privacy Law Exception Indicator</a>	<a href="#">Question 10iii</a>	<a href="#">Conditional. Required if isController='Y'</a>	<a href="#">Identifies if reported trading account controller data is covered by foreign privacy-protection laws</a>	<a href="#">Y = Yes</a> <a href="#">N = No</a>	<a href="#">cftcBatch/cftcForm102/relatedAccount/relatedEntity@foreignPrivacyException</a>
<a href="#">140.1</a>	Trading Account Controller Entity Type	Question 10iii	Conditional, if isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' THEN entityType='NP'		NP = Natural Person	cftcBatch/cftcForm102/relatedAccount/relatedEntity@entityType
<a href="#">143.</a>	<a href="#">Trading Account Controller Client Reporting Issue Indicator</a>	<a href="#">Question 10iii</a>	<a href="#">Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isController='Y'</a>		<a href="#">0 = All trading account controller information is available and reported on form</a> <a href="#">1 = Client did not provide</a> <a href="#">2 = Data supplied by client does not appear to meet the</a>	<a href="#">cftcBatch/cftcForm102/relatedAccount/relatedEntity@clientReportingIssue</a>

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
					<a href="#">CFTC definition of trading account controller</a>	
<del>141.1</del>	Trading Account Controller Natural Person Last Name	Question 10iii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND <a href="#">clientReportingIssue='0'</a> AND <a href="#">foreignPrivacyException='N'</a>	Surname of the natural person trading account Controller		cftcBatch/cftcForm102/relatedAccount/relatedEntity@lastName
<del>142.1</del>	Trading Account Controller Natural Person First Name	Question 10iii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND <a href="#">clientReportingIssue='0'</a> AND <a href="#">foreignPrivacyException='N'</a>	Given or first in order name of the natural person trading account Controller		cftcBatch/cftcForm102/relatedAccount/relatedEntity@firstName

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<del>143</del> .1	Trading Account Controller Natural Person Middle Name	Question 10iii	Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND <u>clientReportingIssue='0'</u> AND <u>foreignPrivacyException='N'</u>	Middle name of the natural person trading account Controller		cftcBatch/cftcForm102/relatedAccount/relatedEntity@middleName
<del>144</del> .1	Trading Account Controller Natural Person Suffix	Question 10iii	Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND <u>clientReportingIssue='0'</u> AND <u>foreignPrivacyException='N'</u>	Suffix of the natural person trading account Controller		cftcBatch/cftcForm102/relatedAccount/relatedEntity@nameSuffix

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<del>145.1</del>	Trading Account Controller Street Address	Question 10iii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' <u>AND</u> <u>clientReportingIssue='0'</u> <u>AND</u> <u>foreignPrivacyException='N'</u>	Street address of the trading account Controller		cftcBatch/cftcForm102/relatedAccount/relatedEntity@street
<del>146.1</del>	Trading Account Controller Suite	Question 10iii	Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformation	Suite of the trading account Controller		cftcBatch/cftcForm102/relatedAccount/relatedEntity@suite

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			onToCome='N' <u>AND</u> <u>clientReportingIssue='0'</u> <u>AND</u> <u>foreignPrivacyException='N'</u>			
<u>147.1</u>	Trading Account Controller City	Question 10iii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' <u>AND</u> <u>clientReportingIssue='0'</u> <u>AND</u> <u>foreignPrivacyException='N'</u>	City of the trading account Controller		cftcBatch/cftcForm102/relatedAccount/relatedEntity@city
<u>148.1</u>	Trading Account Controller State	Question 10iii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/relatedAccount/relatedEntity@state

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND isController='Y' AND FollowOnInformationToCome='N' <u>AND</u> <u>clientReportingIssue='0'</u> AND <u>foreignPrivacyException='N'</u>			
<u>149.1</u>	Trading Account Controller Country	Question 10iii	Conditional. Required if isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' <u>AND</u> <u>clientReportingIssue='0'</u>	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/relatedAccount/relatedEntity@country
<u>150.1</u>	Trading Account Controller Zip/Postal	Question 10iii	Conditional. Required if isTradingAccount='Y'	Zip/Postal code of the trading account Controller		cftcBatch/cftcForm102/relatedAccount/relatedEntity@postalCode

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Code		AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' <u>AND</u> <u>clientReportingIssue='0'</u> <u>AND</u> <u>foreignPrivacyException='N'</u>			
<u>151.1</u>	Trading Account Controller Phone Number	Question 10iii	Conditional. Required if <u>information available</u> AND isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N'	Phone Number of the trading account Controller		cftcBatch/cftcForm102/relatedAccount/relatedEntity@telephone
<u>152.1</u>	Trading Account Controller	Question 10iii	Conditional. Required if <u>information</u>			cftcBatch/cftcForm102/relatedAccount/relatedEntity@employerName

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Name of Employer		<u>available AND</u> isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N'			
<u>153.1</u>	Trading Account Controller Employer NFA ID	Question 10iii	Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N'			cftcBatch/cftcForm102/relatedAccount/relatedEntity@employerNFAIdentifier
<u>154.1</u>	Trading Account Controller Employer Legal Entity	Question 10iii	Conditional. Required if information available AND isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N'			cftcBatch/cftcForm102/relatedAccount/relatedEntity@employerLEI

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Identifier		Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N'			
<del>155.1</del>	Trading Account Controller Job Title	Question 10iii	Conditional. Required if <a href="#">information available</a> AND isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N'	Job title of the contact person for the Controller entity		cftcBatch/cftcForm102/relatedAccount/relatedEntity@titleOrPosition
<del>156.1</del>	Relationship to Trading Account Owner	Question 10iii	Conditional. Required if <a href="#">information available</a> AND isTradingAccount='Y' AND	Relationship to the trading account owner		cftcBatch/cftcForm102/relatedAccount/relatedEntity@relationship

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N'			
<u>157.1</u>	Trading Account Controller Email Address	Question 10iii	Conditional. Required if <u>information available</u> AND isTradingAccount='Y' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N'	Email address of the trading account Controller		cftcBatch/cftcForm102/relatedAccount/relatedEntity@email
<u>158.1</u>	Trading Account Controller NFA ID	Question 10iii	Conditional. Required if <u>information available</u> AND isTradingAccount='Y' AND isOmnibus='N' AND	The identification number given to the Controller entity by the National Futures Association		cftcBatch/cftcForm102/relatedAccount/relatedEntity@NFAIdentifier

	Data Element	Form 102A Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			isController='Y' AND FollowOnInformationToCome='N'			
<b>FOR REPORTING FIRMS THAT ARE FOREIGN BROKERS</b>						
<u>159.1</u>	U.S. Futures Commission Merchant Indicator	Question 11	Conditional, if cftcForm102@isFB = 'Y' THEN relatedEntity@isFCM = 'Y'	Indicates U.S. futures commission merchant when reporting firm indicated as foreign broker	Y = Yes N = No	cftcBatch/cftcForm102/relatedEntity@isFCM <sup>14</sup>
<u>160.1</u>	U.S. Futures Commission Merchant Entity Type	Question 11	Conditional, if isFCM = 'Y' THEN entityType = 'LE'		LE = Legal Entity	cftcBatch/cftcForm102/relatedEntity@entityType
<u>161.1</u>	U.S. Futures Commission Merchant Legal Entity	Question 11	Conditional, if isFCM = 'Y'	Legal Entity Name of the U.S. Futures Commission Merchant		cftcBatch/cftcForm102/relatedEntity@legalEntityName

<sup>14</sup> 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.

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Name					
<u>162.1</u>	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/relatedEntity@street
<u>163.1</u>	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/relatedEntity@suite
<u>164.1</u>	U.S. Futures Commission Merchant City	Question 11	Conditional, if isFCM = 'Y'	City of the reportable account U.S. Futures Commission Merchant		cftcBatch/cftcForm102/relatedEntity@city
<u>165.1</u>	U.S. Futures Commission Merchant State	Question 11	Conditional, if isFCM = 'Y'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/relatedEntity@state
<u>166.1</u>	U.S. Futures Commission Merchant Country	Question 11	Conditional, if isFCM = 'Y'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/relatedEntity@country

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<del>167.1</del>	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/relatedEntity@postalCode
<del>168.1</del>	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/relatedEntity/contact@lastName
<del>169.1</del>	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/relatedEntity/contact@firstName
<del>170.1</del>	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/relatedEntity/contact@middleName
<del>171.1</del>	U.S. Futures Commission Merchant Contact Suffix	Question 11	Conditional. Required if information available AND	Suffix of the natural person contact for the U.S. Futures		cftcBatch/cftcForm102/relatedEntity/contact@nameSuffix

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			isFCM = 'Y'	Commission Merchant		
<u>172.1</u>	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/relatedEntity/contact@titleOrPosition
<u>173.1</u>	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/relatedEntity/contact@telephone
<u>174.1</u>	U.S. Futures Commission Merchant Contact Email Address	Question 11	Conditional, if isFCM = 'Y'	Email address of the contact person at or related to the U.S. Futures Commission Merchant entity		cftcBatch/cftcForm102/relatedEntity/contact@email
<u>175.1</u>	Reporting Firm Authorization Indicator	Signature/Authentication	Yes	Indicates if the submitter is duly authorized by the reporting firm to provide the information and representations	Y = authorized N = not authorized	cftcBatch/cftcForm102/contact@isAuthorizedRepresentative

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
				submitted on this Form 102, and that information and representations are true and correct		
<del>176.1</del>	Authorized Representative Last Name	Signature/Authentication	Yes	Surname of the authorized representative		cftcBatch/cftcForm102/contact@lastName
<del>177.1</del>	Authorized Representative First Name	Signature/Authentication	Yes	Given or first in order name of the authorized representative		cftcBatch/cftcForm102/contact@firstName
<del>178.1</del>	Authorized Representative Middle Name	Signature/Authentication	Yes	Middle name of the authorized representative		cftcBatch/cftcForm102/contact@middleName
<del>179.1</del>	Authorized Representative Name Suffix	Signature/Authentication	Yes	Generation or name suffix of the authorized representative		cftcBatch/cftcForm102/contact@nameSuffix
<del>180.1</del>	Authorized Representative Position	Signature/Authentication	Yes	Job position of the authorized representative		cftcBatch/cftcForm102/contact@titleOrPosition
<del>181.1</del>	Authorized Representative Submitted on behalf of	Signature/Authentication	Yes	Reporting Firm Name 102 was submitted on behalf of		cftcBatch/cftcForm102@onBehalfOf

	<b>Data Element</b>	<b>Form 102A Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<b>182-1</b>	Date of Submission	Signature/Authentication	Yes	Date [indicated by the authorized representative] that the form was submitted to CFTC		cftcBatch/cftcForm102@submitDate

### Data Dictionary for Form 102B – Identifying and reporting a volume threshold account<sup>15</sup>

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

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<sup>15</sup> 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>

<sup>16</sup> 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.

	<b>Data Element</b>	<b>Form 102B Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
1.	New/Modified Indicator	Question 1	Yes	<p>Indicates whether the volume threshold account (102B) is:</p> <ul style="list-style-type: none"> <li>• Re-submitted or modified Information for a previously reported volume threshold account</li> <li>• Re-submitted or modified Information for a previously reported volume threshold account</li> </ul>	N = New M = Modified	cftcBatch/cftcForm102@informationType

	<b>Data Element</b>	<b>Form 102B Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
2.	Volume Threshold Trading Account Number	Question 2	Yes	For each Volume Threshold reported by an entity, provide the trading account number		cftcBatch/cftcForm102/relatedAccount@accountNumber
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/relatedAcctInfo@accountShortCode
4.	Reporting Market	Question 2	Conditional. Required if accountCategory='VT'	Identify the reporting market at which each trading account number appears <sup>17</sup>	ISO Market Identifier Code (MIC) located at: http://www.iso15022.org/MIC/homepageMIC.htm <sup>18</sup>	cftcBatch/cftcForm102/relatedAcctInfo@marketIdentifier

<sup>17</sup> 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.

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

	<b>Data Element</b>	<b>Form 102B Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
5.	Associated Special Account Indicator	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	Y = Yes N = No	cftcBatch/cftcForm102/relatedAccount@isSpecialAccount
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/relatedAccount@accountNumber
<b>VOLUME THRESHOLD ACCOUNT OWNERSHIP AND CONTROL INFORMATION</b>						

	<b>Data Element</b>	<b>Form 102B Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<b>OMNIBUS ACCOUNT INFORMATION</b>						
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 account	Y = Yes N = No	cftcBatch/cftcForm102@isOmnibus
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@accountClass
9.	Volume Threshold Account Omnibus Account	Question 4	Conditional. Required if accountCategory='VT' AND isOmnibus	Indicates reporting Volume Threshold Account Omnibus Account originator	Y = Yes N = No	cftcBatch/cftcForm102/relatedEntity@isOriginator

	<b>Data Element</b>	<b>Form 102B Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Originator Indicator		=‘Y’ THEN isOriginator = ‘Y’			
<b>10.</b>	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/relatedEntity@OptionalOrSuppFieldsSeparatelyReported
<b>11.</b>	Volume Threshold Account Omnibus Account Entity Type	Question 4	Yes, entityType=‘LE’		LE=Legal Entity	cftcBatch/cftcForm102/relatedEntity@entityType
<b>12.</b>	Volume Threshold Account Omnibus	Question 4	Conditional. Required if accountCategory=‘VT’	Legal or registered name of the reportable account Originator		cftcBatch/cftcForm102/relatedEntity@legalEntityName

	<b>Data Element</b>	<b>Form 102B Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Account Originator Name		AND isOmnibus = 'Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'			
<b>13.</b>	Volume Threshold Account Omnibus Account Originator Street Address	Question 4	Conditional. Required if accountCategory='VT' AND isOmnibus = 'Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Street address of the reportable account Originator		cftcBatch/cftcForm102/relatedEntity@street
<b>14.</b>	Volume Threshold Account Omnibus Account Originator Suite	Question 4	Conditional. Required if information available AND accountCategory='VT' AND isOmnibus = 'Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Suite of the reportable account Originator		cftcBatch/cftcForm102/relatedEntity@suite

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

	<b>Data Element</b>	<b>Form 102B Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			IdsSeparatelyReported = 'N'			
<b>18.</b>	Volume Threshold Account Omnibus Account Originator Zip/Postal Code	Question 4	Conditional. Required if accountCategory='VT' AND isOmnibus='Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Zip/Postal code of the reportable account Originator		cftcBatch/cftcForm102/relatedEntity@postalCode
<b>19.</b>	Volume Threshold Account Omnibus Account Originator Phone Number	Question 4	Conditional. Required if accountCategory='VT' AND isOmnibus='Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Phone Number of the reportable account Originator		cftcBatch/cftcForm102/relatedEntity@telephone
<b>20.</b>	Volume Threshold Account Omnibus Account Originator	Question 4	Conditional. Required if accountCategory='VT' AND isOmnibus='Y'	Surname of the natural person contact for the Originator		cftcBatch/cftcForm102/relatedEntity/contact@lastName

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

	<b>Data Element</b>	<b>Form 102B Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			AND OptionalOrSuppFieIdsSeparatelyReported = 'N'			
<b>23.</b>	Volume Threshold Account Omnibus Account Contact Suffix	Question 4	Conditional. Required if information available AND accountCategory='VT' AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Suffix of the natural person contact for the Originator		cftcBatch/cftcForm102/relatedEntity/contact@nameSuffix
<b>24.</b>	Volume Threshold Account Omnibus Account Originator Contact Job Title	Question 4	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/relatedEntity/contact@titleOrPosition

	<b>Data Element</b>	<b>Form 102B Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			IdsSeparatelyReported = 'N'			
25.	Contact Relationship to Volume Threshold Account Omnibus Account Originator	Question 4	Conditional. Required if accountCategory='VT' AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Contact relationship to the Originator entity		cftcBatch/cftcForm102/relatedEntity/contact@relationship
26.	Volume Threshold Account Omnibus Account Originator Contact Phone Number	Question 4	Conditional. Required if accountCategory='VT' AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Phone number of the contact person for the Originator entity		cftcBatch/cftcForm102/relatedEntity/contact@telephone

	<b>Data Element</b>	<b>Form 102B Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
27.	Volume Threshold Account Omnibus Account Originator Contact Email Address	Question 4	Conditional. Required if accountCategory='VT' AND isOmnibus='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Email address of the contact person for the Originator entity		cftcBatch/cftcForm102/relatedEntity/contact@email
28.	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 OptionalOrSuppFieIdsSeparatelyReported = 'N'	URL of the Originator's website		cftcBatch/cftcForm102/relatedEntity@website
29.	Volume Threshold	Question 4	Conditional. Required if	The identification number given to		cftcBatch/cftcForm102/relatedEntity@NFAIdentifier

	<b>Data Element</b>	<b>Form 102B Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Account Omnibus Account Originator NFA ID		information available AND if accountCategory='VT' AND isOmnibus='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N'	the Originator entity by the National Futures Association		
<b>30.</b>	Volume Threshold Account Omnibus Account Originator Legal Entity Identifier (LEI)	Question 4	Conditional. Required if accountCategory='VT' AND isOmnibus='Y' AND OptionalOrSuppFieIdsSeparatelyReported='Y'	The legal entity identifier (LEI) assigned to the Originator entity by the LEI issuer		cftcBatch/cftcForm102/relatedEntity@legalEntityIdentifier
<b>VOLUME THRESHOLD ACCOUNT OWNER(S)</b>						
<b>31.</b>	Volume Threshold Account Owner Indicator	Question 5	Conditional. Required if accountCategory='VT' AND isOmnibus='N'	Indicates reportable Volume Threshold account owner	Y = Yes N = No	cftcBatch/cftcForm102/relatedEntity@isOwner

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			THEN isOwner='Y'			
<u>32.</u>	<u>Foreign Privacy Law Exception Indicator</u>	<u>Question 5</u>	<u>Conditional. Required if isOwner='Y'</u>	<u>Identifies if reported volume threshold account owner data is covered by foreign privacy-protection laws</u>	<u>Y = Yes</u> <u>N = No</u>	<u>cftcBatch/cftcForm102/relatedEntity@foreignPrivacyException</u>
<del>32.</del> <u>33</u>	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/relatedEntity@entityType
<del>33.</del> <u>34</u>	Volume Threshold Account Owner Optional Fields or Supplemental Fields Reported to LEI Provider	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 reported to the CICI Utility (or other CFTC-approved LEI		cftcBatch/cftcForm102/relatedEntity@OptionalOrSuppFieldsSeparatelyReported

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				provider) and are associated with the LEI provided in this submission		
<b>IF VOLUME THRESHOLD ACCOUNT OWNER IS A LEGAL ENTITY</b>						
<del>34.35</del>	Volume Threshold Account Owner Legal Entity Name	Question 5	Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N' <u>AND foreignPrivacyException='N'</u>	Legal or registered name of the reportable account owner		cftcBatch/cftcForm102/relatedEntity@legalEntityName
<b>IF VOLUME THRESHOLD ACCOUNT OWNER IS A NATURAL PERSON</b>						
<del>35.36</del>	Volume Threshold Account Owner Last	Question 5	Conditional. Required if accountCategory='VT'	Surname of the natural person reportable account owner		cftcBatch/cftcForm102/relatedEntity@lastName

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Name		AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' <u>AND</u> <u>foreignPrivacyExce</u> <u>ption='N'</u>			
<del>36-37</del>	Volume Threshold Account Owner First Name	Question 5	Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' <u>AND</u> <u>foreignPrivacyExce</u> <u>ption='N'</u>	Given or first in order name of the natural person reportable account owner		cftcBatch/cftcForm102/relatedEntity@firstName
<del>37-38</del>	Volume Threshold	Question 5	Conditional. Required if	Middle name of the natural person		cftcBatch/cftcForm102/relatedEntity@middleName

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Account Owner Middle Name		information available AND accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND <a href="#">foreignPrivacyException='N'</a>	reportable account owner		
38.39	Volume Threshold Account Owner Suffix	Question 5	Conditional. Required if information available AND accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFie	Suffix of the natural person reportable account owner		cftcBatch/cftcForm102/relatedEntity@nameSuffix

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			IdsSeparatelyReported='N' <u>AND</u> foreignPrivacyException='N'			
<b>FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS</b>						
<del>39.40</del>	Volume Threshold Account Owner Street Address	Question 5	Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND FollowOnInformationToCome='N' <u>AND</u> foreignPrivacyException='N'	Street address of the reportable account owner		cftcBatch/cftcForm102/relatedEntity@street
<del>40.41</del>	Volume Threshold Account Owner Suite	Question 5	Conditional. Required if information available AND accountCategory='	Suite of the reportable account owner		cftcBatch/cftcForm102/relatedEntity@suite

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND FollowOnInformati onToCome='N' <u>AND</u> <u>foreignPrivacyExce ption='N'</u>			
<u>41.42</u>	Volume Threshold Account Owner City	Question 5	Conditional. Required if accountCategory=' VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND FollowOnInformati onToCome='N' <u>AND</u> <u>foreignPrivacyExce</u>	City of the reportable account owner		cftcBatch/cftcForm102/related Entity@city

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			<a href="#">ption='N'</a>			
<del>42.43</del>	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' <a href="#">AND foreignPrivacyExce ption='N'</a>	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/related Entity@state
<del>43.44</del>	Volume Threshold Account Owner Country	Question 5	Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/related Entity@country

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			rtd='N' AND FollowOnInformationToCome='N'			
44.45	Volume Threshold Account Owner Zip/Postal Code	Question 5	Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND FollowOnInformationToCome='N' AND <u>foreignPrivacyException='N'</u>	Zip/Postal code of the reportable account owner		cftcBatch/cftcForm102/relatedEntity@postalCode
45.46	Volume Threshold Account Owner Phone Number	Question 5	Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie	Phone Number of the reportable account owner		cftcBatch/cftcForm102/relatedEntity@telephone

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			<p>IdsSeparatelyReported='N' AND FollowOnInformationToCome='N'</p> <p><u>AND</u></p> <p><u>foreignPrivacyException='N'</u></p>			
<b>IF VOLUME THRESHOLD ACCOUNT OWNER IS A NATURAL PERSON</b>						
<del>46.47</del>	Volume Threshold Account Owner Email Address	Question 5	<p>Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFie</p> <p>IdsSeparatelyReported='N' AND FollowOnInformationToCome='N'</p> <p><u>AND</u></p> <p><u>foreignPrivacyException='N'</u></p>	Email address of the reportable account owner		cftcBatch/cftcForm102/relatedEntity@email

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<b>IF VOLUME THRESHOLD ACCOUNT OWNER IS A LEGAL ENTITY</b>						
<del>47.48</del>	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 ldsSeparatelyRepo rted='N' AND FollowOnInformati onToCome='N' <u>AND</u> <u>foreignPrivacyExce ption='N'</u>	Surname of the natural person contact for the owner		cftcBatch/cftcForm102/relatedEntity/contact@lastName
<del>48.49</del>	Volume Threshold Account Owner Contact First Name	Question 5	Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND	First name of the natural person contact for the owner		cftcBatch/cftcForm102/relatedEntity/contact@firstName

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND FollowOnInformati onToCome='N' <u>AND</u> <u>foreignPrivacyExce ption='N'</u>			
49.50	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 rted='N' AND FollowOnInformati onToCome='N' <u>AND</u>	Middle name of the natural person contact for the owner		cftcBatch/cftcForm102/related Entity/contact@middleName

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			<a href="#">foreignPrivacyException='N'</a>			
<del>50-51</del>	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 OptionalOrSuppFieIdsSeparatelyReported='N' AND FollowOnInformationToCome='N' AND <a href="#">foreignPrivacyException='N'</a>	Suffix of the natural person contact for the owner		cftcBatch/cftcForm102/relatedEntity/contact@nameSuffix
<del>51-52</del>	Volume Threshold Account Owner Contact Job Title	Question 5	Conditional. Required if accountCategory='VT' AND isOmnibus='N'	Job title of the contact person at for the ownership entity		cftcBatch/cftcForm102/relatedEntity/contact@titleOrPosition

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND FollowOnInformationToCome='N' <u>AND foreignPrivacyException='N'</u>			
52.53	Contact Relationship to Volume Threshold Account Owner	Question 5	Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND FollowOnInformationToCome='N' <u>AND</u>	Contact relationship to the ownership entity		cftcBatch/cftcForm102/relatedEntity/contact@relationship

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			<a href="#">foreignPrivacyException='N'</a>			
<del>53-54</del>	Volume Threshold Account Owner Contact Phone Number	Question 5	Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND FollowOnInformationToCome='N' AND <a href="#">foreignPrivacyException='N'</a>	Phone number of the contact person for the ownership entity		cftcBatch/cftcForm102/relatedEntity/contact@telephone
<del>54-55</del>	Volume Threshold Account Owner Contact Email Address	Question 5	Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND	Email address of the contact person for the ownership entity		cftcBatch/cftcForm102/relatedEntity/contact@email

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N' AND FollowOnInformati onToCome='N' <u>AND</u> <u>foreignPrivacyExce ption='N'</u>			
55-56	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 onToCome='N' <u>AND</u> <u>foreignPrivacyExce ption='N'</u>	URL of the owner's website		cftcBatch/cftcForm102/relatedEntity@website

	<b>Data Element</b>	<b>Form 102B Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<del>56</del> .57	Volume Threshold Account Owner NFA ID	Question 5	Conditional. Required if information available AND accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND FollowOnInformationToCome='N' AND <a href="#">foreignPrivacyException</a> ='N'	The identification number given to the ownership entity by the National Futures Association		cftcBatch/cftcForm102/relatedEntity@NFAIdentifier
<del>57</del> .58	Volume Threshold Account Owner Legal Entity Identifier (LEI)	Question 5	Conditional. Required if information available AND accountCategory='VT' AND isOmnibus='N' AND isOwner='Y' AND	The legal entity identifier (LEI) assigned to the ownership entity by the LEI issuer		cftcBatch/cftcForm102/relatedEntity@legalEntityIdentifier

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			OptionalOrSuppFie ldsSeparatelyRepo rted='Y' AND FollowOnInformati onToCome='N' <u>AND</u> <u>foreignPrivacyExce ption='N'</u>			
<b>VOLUME THRESHOLD ACCOUNT CONTROLLER(S)</b>						
<del>58.59</del>	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
<u>60.</u>	<u>Foreign Privacy Law Exception Indicator</u>	<u>Question 6</u>	<u>Conditional. Required if isController='Y'</u>	<u>Identifies if reported volume threshold account controller data is covered by foreign privacy-protection laws</u>	<u>Y = Yes N = No</u>	<u>cftcBatch/cftcForm102/related Entity@foreignPrivacyExceptio n</u>
<del>59.61</del>	Volume Threshold	Question 6	Conditional. Required if		NP = Natural Person	cftcBatch/cftcForm102/related Entity@entityType

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Account Controller Entity Type		accountCategory='VT' AND isOmnibus='N' AND isController='Y' THEN entityType='NP'			
<b>62.</b>	<u>Volume Threshold Account Controller Client Reporting Issue Indicator</u>	<u>Question 6</u>	<u>Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isController='Y'</u>		<u>0 = All volume threshold account controller information is available and reported on form</u> <u>1 = Client did not provide</u> <u>2 = Data supplied by client does not appear to meet the CFTC definition of trading account controller</u>	<u>cftcBatch/cftcForm102/related Entity@clientReportingIssue</u>
<del>60-63</del>	Volume Threshold Account Controller Natural Person Last	Question 6	Conditional. Required if accountCategory='VT' AND isOmnibus='N'	Surname of the natural person reportable account Controller		cftcBatch/cftcForm102/related Entity@lastName

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Name		AND isController='Y' <u>AND</u> <u>clientReportingIssue='0'</u> AND <u>foreignPrivacyException='N'</u>			
<del>61-64</del>	Volume Threshold Account Controller Natural Person First Name	Question 6	Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isController='Y' <u>AND</u> <u>clientReportingIssue='0'</u> AND <u>foreignPrivacyException='N'</u>	Given or first in order name of the natural person reportable account Controller		cftcBatch/cftcForm102/relatedEntity@firstName
<del>62-65</del>	Volume Threshold Account Controller Natural Person Middle Name	Question 6	Conditional. Required if information available AND accountCategory='VT' AND isOmnibus='N'	Middle name of the natural person reportable account Controller		cftcBatch/cftcForm102/relatedEntity@middleName

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND isController='Y' <u>AND</u> <u>clientReportingIssue='0'</u> AND <u>foreignPrivacyException='N'</u>			
<del>63-66</del>	Volume Threshold Account Controller Natural Person Suffix	Question 6	Conditional. Required if information available AND accountCategory='VT' AND isOmnibus='N' AND isController='Y' <u>AND</u> <u>clientReportingIssue='0'</u> AND <u>foreignPrivacyException='N'</u>	Suffix of the natural person reportable account Controller		cftcBatch/cftcForm102/relatedEntity@nameSuffix
<del>64-67</del>	Volume Threshold Account Controller Street Address	Question 6	Conditional. Required if accountCategory='VT' AND isOmnibus='N'	Street address of the reportable account Controller		cftcBatch/cftcForm102/relatedEntity@street

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND isController='Y' AND FollowOnInformationToCome='N' <u>AND</u> <u>clientReportingIssue='0'</u> AND <u>foreignPrivacyException='N'</u>			
<del>65-68</del>	Volume Threshold Account Controller Suite	Question 6	Conditional (not required), if accountCategory='VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' <u>AND</u> <u>clientReportingIssue='0'</u> AND <u>foreignPrivacyException='N'</u>	Suite of the reportable account Controller		cftcBatch/cftcForm102/relatedEntity@suite
<del>66-69</del>	Volume Threshold	Question 6	Conditional. Required if	City of the reportable		cftcBatch/cftcForm102/relatedEntity@city

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Account Controller City		accountCategory='VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' <u>AND</u> <u>clientReportingIssue='0'</u> <u>AND</u> <u>foreignPrivacyException='N'</u>	account Controller		
<del>67.70</del>	Volume Threshold Account Controller State	Question 6	Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' <u>AND</u> <u>clientReportingIssue='0'</u> <u>AND</u>	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/relatedEntity@state

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			<a href="#">foreignPrivacyException='N'</a>			
<del>68.71</del>	Volume Threshold Account Controller Country	Question 6	Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' AND <a href="#">clientReportingIssue='0'</a>	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/relatedEntity@country
<del>69.72</del>	Volume Threshold Account Controller Zip/Postal Code	Question 6	Conditional. Required if accountCategory='VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N' AND <a href="#">AND</a>	Zip/Postal code of the reportable account Controller		cftcBatch/cftcForm102/relatedEntity@postalCode

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			<a href="#">clientReportingIssue='0'</a> AND <a href="#">foreignPrivacyException='N'</a>			
<del>70.73</del>	Volume Threshold Account Controller Phone Number	Question 6	Conditional. Required if <a href="#">information available</a> AND <a href="#">accountCategory='VT'</a> AND <a href="#">isOmnibus='N'</a> AND <a href="#">isController='Y'</a> AND <a href="#">FollowOnInformationToCome='N'</a>	Phone Number of the reportable account Controller		cftcBatch/cftcForm102/relatedEntity@telephone
<del>71.74</del>	Volume Threshold Account Controller Name of Employer	Question 6	Conditional. Required if <a href="#">information available</a> AND <a href="#">accountCategory='VT'</a> AND <a href="#">isOmnibus='N'</a> AND <a href="#">isController='Y'</a> AND			cftcBatch/cftcForm102/relatedEntity@employerName

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			FollowOnInformationToCome='N'			
72-75	Volume Threshold Account Controller Employer NFA ID	Question 6	Conditional. Required if information available AND accountCategory='VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N'			cftcBatch/cftcForm102/relatedEntity@employerNFAIdentifier
73-76	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 FollowOnInformationToCome='N'			cftcBatch/cftcForm102/relatedEntity@employerLEI

	<b>Data Element</b>	<b>Form 102B Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<del>74-77</del>	Volume Threshold Account Controller Job Title	Question 6	Conditional. Required if <a href="#">information available</a> AND accountCategory='VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N'	Job title of the contact person for the Controller entity		cftcBatch/cftcForm102/relatedEntity@titleOrPosition
<del>75-78</del>	Relationship to Volume Threshold Account Owner	Question 6	Conditional. Required if <a href="#">information available</a> AND accountCategory='VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N'	Contact relationship to trading account owner		cftcBatch/cftcForm102/relatedEntity@relationship
<del>76-79</del>	Volume Threshold	Question 6	Conditional. Required if	Email address of the reportable		cftcBatch/cftcForm102/relatedEntity@email

	Data Element	Form 102B Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Account Controller Email Address		<a href="#">information available</a> AND accountCategory='VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N'	account Controller		
<del>77.80</del>	Volume Threshold Account Controller NFA ID	Question 6	Conditional. Required if <a href="#">information available</a> AND accountCategory='VT' AND isOmnibus='N' AND isController='Y' AND FollowOnInformationToCome='N'	The identification number given to the Controller entity by the National Futures Association		cftcBatch/cftcForm102/relatedEntity@NFAIdentifier
<del>78.81</del>	Reporting Firm Authorization Indicator	Signature/Authentication	Yes	Indicates if the submitter is duly authorized by the reporting firm to	Y = authorized N = not authorized	cftcBatch/cftcForm102/contact@isAuthorizedRepresentative

	<b>Data Element</b>	<b>Form 102B Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
				provide the information and representations submitted on this Form 102, and that information and representations are true and correct		
<del>79-82</del>	Authorized Representative Last Name	Signature/Authentication	Yes	Surname of the authorized representative		cftcBatch/cftcForm102/contact@lastName
<del>80-83</del>	Authorized Representative First Name	Signature/Authentication	Yes	Given or first in order name of the authorized representative		cftcBatch/cftcForm102/contact@firstName
<del>81-84</del>	Authorized Representative Middle Name	Signature/Authentication	Yes	Middle name of the authorized representative		cftcBatch/cftcForm102/contact@middleName
<del>82-85</del>	Authorized Representative Name Suffix	Signature/Authentication	Yes	Generation or name suffix of the authorized representative		cftcBatch/cftcForm102/contact@nameSuffix
<del>83-86</del>	Authorized Representative Position	Signature/Authentication	Yes	Job position of the authorized representative		cftcBatch/cftcForm102/contact@titleOrPosition

	<b>Data Element</b>	<b>Form 102B Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<del>84.87</del>	Authorized Representative Submitted on behalf of	Signature/Authentication	Yes	Reporting Firm Name 102 was submitted on behalf of		cftcBatch/cftcForm102@onBehalfOf
<del>85.88</del>	Date of Submission	Signature/Authentication	Yes	Date [indicated by the authorized representative] that the form was submitted to CFTC		cftcBatch/cftcForm102@submitDate

**Data Dictionary for Form 102S – Identifying and reporting a consolidated account<sup>19</sup>**

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<b>1.</b>	New/Modified Indicator	Question 1	Yes	Indicates whether the consolidated account (102S) is: <ul style="list-style-type: none"> <li>• Counterparty or customer reported for the first time</li> <li>• Re-submitted or modified</li> </ul>	N = New M = Modified	cftcBatch/cftcForm102@informationType

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<sup>19</sup> 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>

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
				Information for a previously reported counterparty or customer		
<b>2.</b>	102S Counterparty Identifier	Question 2	Yes	A unique identifier for each reporting entity or counterparty/customer as assigned by the reporting entity		cftcBatch/cftcForm102@accountNumber
<b>3.</b>	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	Y = Yes N = No	cftcBatch/cftcForm102@isSpecialAccount

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
				referenced. Indicates if the same identifier is being so used.		
4.	House or Customer Indicator	Question 3i	<del>Yes</del> No	Consolidated account type	H = House C = Customer	cftcBatch/cftcForm102@accountClass
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@isOmnibus
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@accountClass

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<b>CONSOLIDATED ACCOUNT OWNERSHIP AND CONTROL INFORMATION</b>						
<b>OMNIBUS ACCOUNT INFORMATION</b>						
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.	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 provider) and are associated with the LEI provided in this submission	Y = Yes N = No	cftcBatch/cftcForm102/related Entity@OptionalOrSuppFieldsSeparatelyReported
9.	Consolidated Account	Question 3ii	Yes, entityType='LE'		LE=Legal Entity	cftcBatch/cftcForm102/related Entity@entityType

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Omnibus Account Entity Type					
<b>10.</b>	Consolidated Account Omnibus Account Originator Name	Question 3ii	Conditional. Required if isOmnibus = 'Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Name of the reportable account Originator		cftcBatch/cftcForm102/relatedEntity@legalEntityName
<b>11.</b>	Consolidated Account Omnibus Account Originator Street Address	Question 3ii	Conditional. Required if isOmnibus = 'Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Street address of the reportable account Originator		cftcBatch/cftcForm102/relatedEntity@street
<b>12.</b>	Consolidated Account Omnibus Account Originator Suite	Question 3ii	Conditional. Required if information available AND isOmnibus = 'Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Suite of the reportable account Originator		cftcBatch/cftcForm102/relatedEntity@suite

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
13.	Consolidated Account Omnibus Account Originator City	Question 3ii	Conditional. Required if isOmnibus = 'Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	City of the reportable account Originator		cftcBatch/cftcForm102/relatedEntity@city
14.	Consolidated Account Omnibus Account Originator State	Question 3ii	Conditional. Required if isOmnibus = 'Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/relatedEntity@state
15.	Consolidated Account Omnibus Account Originator Country	Question 3ii	Conditional. Required if isOmnibus = 'Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/relatedEntity@country
16.	Consolidated Account Omnibus Account Originator Zip/Postal Code	Question 3ii	Conditional. Required if isOmnibus = 'Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Zip/Postal code of the reportable account Originator		cftcBatch/cftcForm102/relatedEntity@postalCode

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
17.	Consolidated Account Omnibus Account Originator Phone Number	Question 3ii	Conditional. Required if isOmnibus = 'Y' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Phone Number of the reportable account Originator		cftcBatch/cftcForm102/relatedEntity@telephone
18.	Consolidated Account Omnibus Account Originator Contact Last Name	Question 3ii	Conditional. Required if isOmnibus = 'Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Surname of the natural person contact for the Originator		cftcBatch/cftcForm102/relatedEntity/contact@lastName
19.	Consolidated Account Omnibus Account Originator Contact First Name	Question 3ii	Conditional. Required if isOmnibus = 'Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	First name of the natural person contact for the Originator		cftcBatch/cftcForm102/relatedEntity/contact@firstName
20.	Consolidated Account Omnibus	Question 3ii	Conditional. Required if information	Middle name of the natural person contact for the		cftcBatch/cftcForm102/relatedEntity/contact@middleName

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Account Contact Middle Name		available AND isOmnibus = 'Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Originator		
<b>21.</b>	Consolidated Account Omnibus Account Contact Suffix	Question 3ii	Conditional. Required if information available AND isOmnibus = 'Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Suffix of the natural person contact for the Originator		cftcBatch/cftcForm102/relatedEntity/contact@nameSuffix
<b>22.</b>	Consolidated Account Omnibus Account Originator Contact Job Title	Question 3ii	Conditional. Required if isOmnibus = 'Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyRepo	Job title of the contact person for the Originator entity		cftcBatch/cftcForm102/relatedEntity/contact@titleOrPosition

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			rtd = 'N'			
23.	Contact Relationship to Consolidated Account Omnibus Account Originator	Question 3ii	Conditional; <del>if Conditional.</del> Required if isOmnibus = 'Y' AND entityType = 'LE' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Contact relationship to the Originator entity		cftcBatch/cftcForm102/relatedEntity/contact@relationship
24.	Consolidated Account Omnibus Account Originator Contact Phone Number	Question 3ii	Conditional. Required if isOmnibus = 'Y' AND entityType = 'LE' AND OptionalOrSuppFieIdsSeparatelyReported = 'N'	Phone number of the contact person for the Originator entity		cftcBatch/cftcForm102/relatedEntity/contact@telephone
25.	Consolidated Account Omnibus Account Originator Contact Email	Question 3ii	Conditional. Required if isOmnibus = 'Y' AND entityType = 'LE' AND	Email address of the contact person for the Originator entity		cftcBatch/cftcForm102/relatedEntity/contact@email

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Address		OptionalOrSuppFieIdsSeparatelyReported = 'N'			
<b>26.</b>	Consolidated Account Omnibus Account Originator Website	Question 3ii	Conditional. Required if information available AND isOmnibus = 'Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N'	URL of the Originator's website		cftcBatch/cftcForm102/relatedEntity@website
<b>27.</b>	Consolidated Account Omnibus Account Originator NFA ID	Question 3ii	Conditional. Required if information available AND isOmnibus = 'Y' AND OptionalOrSuppFieIdsSeparatelyReported='N'	The identification number given to the Originator entity by the National Futures Association		cftcBatch/cftcForm102/relatedEntity@NFAIdentifier
<b>28.</b>	Consolidated Account Omnibus Account Originator	Question 3ii	Conditional. Required if information available AND isOmnibus='Y'	The legal entity identifier (LEI) assigned to the Originator entity by the LEI issuer		cftcBatch/cftcForm102/relatedEntity@legalEntityIdentifier

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Legal Entity Identifier (LEI)		AND OptionalOrSuppFieldsSeparatelyReported='Y'			
<b><u>CONSOLIDATED ACCOUNT COUNTERPARTY</u></b>						
<u>29.</u>	<u>Consolidated Account Counterparty Indicator</u>		<u>Yes, isCounterparty='Y'</u>	<u>Indicates reportable Consolidated account counterparty</u>	<u>Y = Yes N = No</u>	<u>cftcBatch/cftcForm102/relatedEntity@isCounterparty</u>
<u>30.</u>	<u>Foreign Privacy Law Exception Indicator</u>		<u>Conditional. Required if isCounterparty='Y'</u>	<u>Identifies if reported counterparty data is covered by foreign privacy-protection laws</u>	<u>Y = Yes N = No</u>	<u>cftcBatch/cftcForm102/relatedEntity@foreignPrivacyException</u>
<u>31.</u>	<u>Consolidated Account Counterparty Type Indicator</u>		<u>Conditional. Required if isOmnibus='N' AND isCounterparty='Y'</u>	<u>Indicates whether the Consolidated account counterparty is a legal entity or natural person</u>	<u>LE = Legal Entity NP = Natural Person</u>	<u>cftcBatch/cftcForm102/relatedEntity@entityType</u>
<u>32.</u>	<u>Consolidated Account Counterparty Optional</u>		<u>Conditional. Required if isOmnibus='N' AND</u>	<u>Indicates that one or more "Optional Fields" or "Supplemental</u>	<u>Y = Yes N = No</u>	<u>cftcBatch/cftcForm102/relatedEntity@OptionalOrSuppFieldsSeparatelyReported</u>

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	<u>Fields or Supplemental Fields Reported to LEI Provider</u>		<u>isCounterparty='Y'</u>	<u>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</u>		
<b><u>IF CONSOLIDATED ACCOUNT COUNTERPARTY IS A LEGAL ENTITY</u></b>						
<b><u>33.</u></b>	<u>Consolidated Account Counterparty Legal Entity Name</u>		<u>Conditional. Required if isOmnibus='N' AND isCounterparty='Y' AND entityType='LE' AND OptionalOrSuppFieldsSeparatelyReported='N' AND foreignPrivacyException = 'N'</u>	<u>Legal or registered name of the reportable account counterparty</u>		<u>cftcBatch/cftcForm102/relatedEntity@legalEntityName</u>

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<b><u>IF CONSOLIDATED ACCOUNT COUNTERPARTY IS A NATURAL PERSON</u></b>						
<u>34.</u>	<u>Consolidated Account Counterparty Last Name</u>		<u>Conditional. Required if isOmnibus='N' AND isCounterparty='Y' AND entityType='NP' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND foreignPrivacyException = 'N'</u>	<u>Surname of the natural person reportable account counterparty</u>		<u>cftcBatch/cftcForm102/relatedEntity@lastName</u>
<u>35.</u>	<u>Consolidated Account Counterparty First Name</u>		<u>Conditional. Required if isOmnibus='N' AND isCounterparty='Y' AND entityType='NP' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND foreignPrivacyException = 'N'</u>	<u>Given or first in order name of the natural person reportable account counterparty</u>		<u>cftcBatch/cftcForm102/relatedEntity@firstName</u>

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<u>36.</u>	<u>Consolidated Account Counterparty Middle Name</u>		<u>Conditional. Required if information available AND isOmnibus='N' AND isCounterparty='Y' AND entityType='NP' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND foreignPrivacyException = 'N'</u>	<u>Middle name of the natural person reportable account counterparty</u>		<u>cftcBatch/cftcForm102/related Entity@middleName</u>
<u>37.</u>	<u>Consolidated Account Counterparty Suffix</u>		<u>Conditional. Required if information available AND isOmnibus='N' AND isCounterparty='Y' AND entityType='NP' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND</u>	<u>Suffix of the natural person reportable account counterparty</u>		<u>cftcBatch/cftcForm102/related Entity@nameSuffix</u>

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			<a href="#">foreignPrivacyException = 'N'</a>			
<b><u>FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS</u></b>						
<a href="#">38.</a>	<a href="#">Consolidated Account Counterparty Street Address</a>		<a href="#">Conditional. Required if isOmnibus='N' AND isCounterparty='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND foreignPrivacyException = 'N'</a>	<a href="#">Street address of the reportable account counterparty</a>		<a href="#">cftcBatch/cftcForm102/relatedEntity@street</a>
<a href="#">39.</a>	<a href="#">Consolidated Account Counterparty Suite</a>		<a href="#">Conditional. Required if isOmnibus='N' AND isCounterparty='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND foreignPrivacyException = 'N'</a>	<a href="#">Suite of the reportable account counterparty</a>		<a href="#">cftcBatch/cftcForm102/relatedEntity@suite</a>

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			<u>ption = 'N'</u>			
<u>40.</u>	<u>Consolidated Account Counterparty City</u>		<u>Conditional. Required if isOmnibus='N' AND isCounterparty = 'Y' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'</u>	<u>City of the reportable account counterparty</u>		<u>cftcBatch/cftcForm102/related Entity@city</u>
<u>41.</u>	<u>Consolidated Account Counterparty State</u>		<u>Conditional. Required if isOmnibus='N' AND isCounterparty = 'Y' AND OptionalOrSuppFie ldsSeparatelyRepo rted='N' AND foreignPrivacyExce ption = 'N'</u>	<u>ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters</u>		<u>cftcBatch/cftcForm102/related Entity@state</u>

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<a href="#"><u>42.</u></a>	<a href="#"><u>Consolidated Account Counterparty Country</u></a>		<a href="#"><u>Conditional. Required if isOmnibus='N' AND isCounterparty='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N'</u></a>	<a href="#"><u>ISO 3166-1 alpha-2 country code</u></a>		<a href="#"><u>cftcBatch/cftcForm102/relatedAccount/relatedEntity@country</u></a>
<a href="#"><u>43.</u></a>	<a href="#"><u>Consolidated Account Counterparty Zip/Postal Code</u></a>		<a href="#"><u>Conditional. Required if isOmnibus='N' AND isCounterparty='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND foreignPrivacyException = 'N'</u></a>	<a href="#"><u>Zip/Postal code of the reportable account counterparty</u></a>		<a href="#"><u>cftcBatch/cftcForm102/relatedEntity@postalCode</u></a>
<a href="#"><u>44.</u></a>	<a href="#"><u>Consolidated Account Counterparty Phone Number</u></a>		<a href="#"><u>Conditional. Required if isOmnibus='N' AND isCounterparty='Y' AND</u></a>	<a href="#"><u>Phone Number of the reportable account counterparty</u></a>		<a href="#"><u>cftcBatch/cftcForm102/relatedEntity@telephone</u></a>

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			<u>OptionalOrSuppFieIdsSeparatelyReported='N'</u> AND <u>foreignPrivacyException = 'N'</u>			
<b><u>IF CONSOLIDATED ACCOUNT COUNTERPARTY IS A NATURAL PERSON</u></b>						
<b><u>45.</u></b>	<u>Consolidated Account Counterparty Email Address</u>		<u>Conditional. Required if isOmnibus='N'</u> AND <u>isCounterparty='Y'</u> AND <u>entityType='NP'</u> AND <u>OptionalOrSuppFieIdsSeparatelyReported='N'</u> AND <u>foreignPrivacyException = 'N'</u>	<u>Email address of the reportable account counterparty</u>		<u>cftcBatch/cftcForm102/related Entity@email</u>
<b><u>IF CONSOLIDATED ACCOUNT COUNTERPARTY IS A LEGAL ENTITY</u></b>						
<b><u>46.</u></b>	<u>Consolidated Account Counterparty Contact Last</u>		<u>Conditional. Required if isOmnibus='N'</u> AND	<u>Surname of the contact person for the counterparty</u>		<u>cftcBatch/cftcForm102/related Entity/contact@lastName</u>

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	<u>Name</u>		<u>isCounterparty='Y'</u> <u>AND</u> <u>entityType='LE'</u> <u>AND</u> <u>OptionalOrSuppFie</u> <u>IdsSeparatelyRepo</u> <u>rted='N'</u> <u>AND</u> <u>foreignPrivacyExce</u> <u>ption = 'N'</u>			
<u>47.</u>	<u>Consolidated</u> <u>Account</u> <u>Counterparty</u> <u>Contact First</u> <u>Name</u>		<u>Conditional.</u> <u>Required if</u> <u>isOmnibus='N'</u> <u>AND</u> <u>isCounterparty</u> <u>= 'Y'</u> <u>AND</u> <u>entityType='LE'</u> <u>AND</u> <u>OptionalOrSuppFie</u> <u>IdsSeparatelyRepo</u> <u>rted='N'</u> <u>AND</u> <u>foreignPrivacyExce</u> <u>ption = 'N'</u>	<u>First name of the</u> <u>contact person for</u> <u>the counterparty</u>		<u>cftcBatch/cftcForm102/related</u> <u>Entity/contact@firstName</u>
<u>48.</u>	<u>Consolidated</u> <u>Account</u> <u>Counterparty</u> <u>Contact</u> <u>Middle Name</u>		<u>Conditional.</u> <u>Required if</u> <u>information</u> <u>available AND</u> <u>isOmnibus='N'</u>	<u>Middle name of</u> <u>the contact person</u> <u>for the</u> <u>counterparty</u>		<u>cftcBatch/cftcForm102/related</u> <u>Entity/contact@middleName</u>

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			<u>AND</u> <u>isCounterparty = 'Y'</u> <u>AND</u> <u>entityType='LE'</u> <u>AND</u> <u>OptionalOrSuppFieIdsSeparatelyReported='N'</u> <u>AND</u> <u>foreignPrivacyException = 'N'</u>			
<u>49.</u>	<u>Consolidated Account Counterparty Contact Suffix</u>		<u>Conditional. Required if information available AND isOmnibus='N'</u> <u>AND</u> <u>isCounterparty = 'Y'</u> <u>AND</u> <u>entityType='LE'</u> <u>AND</u> <u>OptionalOrSuppFieIdsSeparatelyReported='N'</u> <u>AND</u> <u>foreignPrivacyException = 'N'</u>	<u>Suffix of the contact person for the counterparty</u>		<u>cftcBatch/cftcForm102/related Entity/contact@nameSuffix</u>

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<u>50.</u>	<u>Consolidated Account Counterparty Contact Job Title</u>		<u>Conditional. Required if isOmnibus='N' AND isCounterparty='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND foreignPrivacyException = 'N'</u>	<u>Job title of the contact person for the counterparty entity</u>		<u>cftcBatch/cftcForm102/relatedEntity/contact@titleOrPosition</u>
<u>51.</u>	<u>Contact Relationship to Consolidated Account Counterparty</u>		<u>Conditional. Required if isOmnibus='N' AND isCounterparty='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND foreignPrivacyException = 'N'</u>	<u>Contact relationship to the counterparty entity</u>		<u>cftcBatch/cftcForm102/relatedEntity/contact@relationship</u>

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<u>52.</u>	<u>Consolidated Account Counterparty Contact Phone Number</u>		<u>Conditional. Required if isOmnibus='N' AND isCounterparty='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND foreignPrivacyException = 'N'</u>	<u>Phone number of the contact person for the counterparty entity</u>		<u>cftcBatch/cftcForm102/related Entity/contact@telephone</u>
<u>53.</u>	<u>Consolidated Account Counterparty Contact Email Address</u>		<u>Conditional. Required if isOmnibus='N' AND isCounterparty='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND foreignPrivacyException = 'N'</u>	<u>Email address of the contact person for the counterparty entity</u>		<u>cftcBatch/cftcForm102/related Entity/contact@email</u>

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<u>54.</u>	<u>Consolidated Account Counterparty Website</u>		<u>Conditional. Required if information available AND isOmnibus='N' AND isCounterparty='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND foreignPrivacyException = 'N'</u>	<u>URL of the counterparty's website</u>		<u>cftcBatch/cftcForm102/relatedEntity@website</u>
<u>55.</u>	<u>Consolidated Account Counterparty NFA ID</u>		<u>Conditional. Required if information available AND isOmnibus='N' AND isCounterparty='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N' AND foreignPrivacyException = 'N'</u>	<u>The identification number given to the counterparty entity by the National Futures Association</u>		<u>cftcBatch/cftcForm102/relatedEntity@NFAIdentifier</u>

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<u>56.</u>	<u>Consolidated Account Counterparty Legal Entity Identifier (LEI)</u>		<u>Conditional. Required if information available AND isOmnibus='N' AND isCounterparty='Y' AND OptionalOrSuppFieIdsSeparatelyReported='Y' AND foreignPrivacyException='N'</u>	<u>The legal entity identifier (LEI) assigned to the counterparty entity by the LEI issuer</u>		<u>cftcBatch/cftcForm102/relatedEntity@legalEntityIdentifier</u>
<b>CONSOLIDATED ACCOUNT OWNER(S)</b>						
<del>29.</del> <u>57.</u>	Consolidated Account Owner Indicator	Question 3iii	Conditional. Required if <u>information available AND isOmnibus='N'</u> THEN isOwner='Y'	Indicates reportable Consolidated account owner	Y = Yes N = No	cftcBatch/cftcForm102/relatedEntity@isOwner
<del>30.</del> <u>58.</u>	Consolidated Account Owner Type Indicator	Question 3iii	Conditional. Required if <u>information available AND isOmnibus='N'</u>	Indicates whether the Consolidated account owner is a legal entity or natural person	LE = Legal Entity NP = Natural Person	cftcBatch/cftcForm102/relatedEntity@entityType

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND isOwner='Y'			
<del>31.59</del>	Consolidated Account Owner Optional Fields or Supplemental Fields Reported to LEI Provider	Question 3iii	Conditional. Required if <a href="#">information available AND</a> 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-approved LEI provider) and are associated with the LEI provided in this submission	Y = Yes N = No	cftcBatch/cftcForm102/relatedEntity@OptionalOrSuppFieldsSeparatelyReported
<b>IF CONSOLIDATED ACCOUNT OWNER IS A LEGAL ENTITY</b>						
<del>32.60</del>	Consolidated Account Owner Legal Entity Name	Question 3iii	Conditional. Required if <a href="#">information available AND</a> isOmnibus='N' AND isOwner='Y' AND entityType='LE'	Legal or registered name of the reportable account owner		cftcBatch/cftcForm102/relatedEntity@legalEntityName

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'			
<b>IF CONSOLIDATED ACCOUNT OWNER IS A NATURAL PERSON</b>						
<u>33.61</u>	Consolidated Account Owner Last Name	Question 3iii	Conditional. Required if <a href="#">information available AND</a> isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'	Surname of the natural person reportable account owner		cftcBatch/cftcForm102/relatedEntity@lastName
<u>34.62</u>	Consolidated Account Owner First Name	Question 3iii	Conditional. Required if <a href="#">information available AND</a> isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND	Given or first in order name of the natural person reportable account owner		cftcBatch/cftcForm102/relatedEntity@firstName

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			OptionalOrSuppFieIdsSeparatelyReported='N'			
<u>35-63</u>	Consolidated Account Owner Middle Name	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Middle name of the natural person reportable account owner		cftcBatch/cftcForm102/relatedEntity@middleName
<u>36-64</u>	Consolidated Account Owner Suffix	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND entityType='NP' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Suffix of the natural person reportable account owner		cftcBatch/cftcForm102/relatedEntity@nameSuffix

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<b>FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS</b>						
<del>37</del> .65	Consolidated Account Owner Street Address	Question 3iii	Conditional. Required if <a href="#">information available AND</a> isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Street address of the reportable account owner		cftcBatch/cftcForm102/relatedEntity@street
<del>38</del> .66	Consolidated Account Owner Suite	Question 3iii	Conditional. Required if <a href="#">information available AND</a> isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Suite of the reportable account owner		cftcBatch/cftcForm102/relatedEntity@suite
<del>39</del> .67	Consolidated Account Owner City	Question 3iii	Conditional. Required if <a href="#">information available AND</a> isOmnibus='N'	City of the reportable account owner		cftcBatch/cftcForm102/relatedEntity@city

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'			
<u>40.68</u>	Consolidated Account Owner State	Question 3iii	Conditional. Required if <a href="#">information available</a> AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/relatedEntity@state
<u>41.69</u>	Consolidated Account Owner Country	Question 3iii	Conditional. Required if <a href="#">information available</a> AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/relatedAccount/relatedEntity@country
<u>42.70</u>	Consolidated Account Owner	Question 3iii	Conditional. Required if <a href="#">information</a>	Zip/Postal code of the reportable account owner		cftcBatch/cftcForm102/relatedEntity@postalCode

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Zip/Postal Code		<a href="#">available AND</a> isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N'			
<a href="#">43.71</a>	Consolidated Account Owner Phone Number	Question 3iii	Conditional. Required if <a href="#">information available AND</a> isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Phone Number of the reportable account owner		cftcBatch/cftcForm102/relatedEntity@telephone
<b>IF CONSOLIDATED ACCOUNT OWNER IS A NATURAL PERSON</b>						
<a href="#">44.72</a>	Consolidated Account Owner Email Address	Question 3iii	Conditional. Required if <a href="#">information available AND</a> isOmnibus='N' AND isOwner='Y' AND	Email address of the reportable account owner		cftcBatch/cftcForm102/relatedEntity@email

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			entityType='NP' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'			
<b>IF CONSOLIDATED ACCOUNT OWNER IS A LEGAL ENTITY</b>						
<u>45.73</u>	Consolidated Account Owner Contact Last Name	Question 3iii	Conditional. Required if <a href="#">information available</a> AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Surname of the contact person for the owner		cftcBatch/cftcForm102/relatedEntity/contact@lastName
<u>46.74</u>	Consolidated Account Owner Contact First Name	Question 3iii	Conditional. Required if <a href="#">information available</a> AND isOmnibus='N' AND isOwner='Y' AND entityType='LE'	First name of the contact person for the owner		cftcBatch/cftcForm102/relatedEntity/contact@firstName

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'			
<b>47.75</b>	Consolidated Account Owner Contact Middle Name	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'	Middle name of the contact person for the owner		cftcBatch/cftcForm102/related Entity/contact@middleName
<b>48.76</b>	Consolidated Account Owner Contact Suffix	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'	Suffix of the contact person for the owner		cftcBatch/cftcForm102/related Entity/contact@nameSuffix

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<u>49.77</u>	Consolidated Account Owner Contact Job Title	Question 3iii	Conditional. Required if <a href="#">information available AND</a> isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Job title of the contact person for the ownership entity		cftcBatch/cftcForm102/relatedEntity/contact@titleOrPosition
<u>50.78</u>	Contact Relationship to Consolidated Account Owner	Question 3iii	Conditional. Required if <a href="#">information available AND</a> isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Contact relationship to the ownership entity		cftcBatch/cftcForm102/relatedEntity/contact@relationship
<u>51.79</u>	Consolidated Account Owner Contact	Question 3iii	Conditional. Required if <a href="#">information available AND</a>	Phone number of the contact person for the ownership entity		cftcBatch/cftcForm102/relatedEntity/contact@telephone

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Phone Number		isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'			
<del>52-80</del>	Consolidated Account Owner Contact Email Address	Question 3iii	Conditional. Required if <a href="#">information available AND</a> isOmnibus='N' AND isOwner='Y' AND entityType='LE' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'	Email address of the contact person for the ownership entity		cftcBatch/cftcForm102/related Entity/contact@email
<del>53-81</del>	Consolidated Account Owner Website	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFie	URL of the owner's website		cftcBatch/cftcForm102/related Entity@website

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			IdsSeparatelyReported='N'			
<del>54</del> .82	Consolidated Account Owner NFA ID	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N'	The identification number given to the ownership entity by the National Futures Association		cftcBatch/cftcForm102/relatedEntity@NFAIdentifier
<del>55</del> .83	Consolidated Account Owner Legal Entity Identifier (LEI)	Question 3iii	Conditional. Required if information available AND isOmnibus='N' AND isOwner='Y' AND OptionalOrSuppFieIdsSeparatelyReported='Y'	The legal entity identifier (LEI) assigned to the ownership entity by the LEI issuer		cftcBatch/cftcForm102/relatedEntity@legalEntityIdentifier
<b>CONSOLIDATED ACCOUNT CONTROLLER(S)</b>						
<del>56</del> .84	Consolidated Account Controller	Question 3iv	Conditional. Required if <u>information</u>	Indicates reporting Consolidated account Controller	Y = Yes N = No	cftcBatch/cftcForm102/relatedEntity@isController

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Indicator		<a href="#">available AND</a> isOmnibus='N' THEN isController='Y'			
<del>57</del> -85	Consolidated Account Controller Entity Type	Question 3iv	Conditional. Required if <a href="#">information available AND</a> isOmnibus='N' AND isController='Y'		LE = Legal Entity NP = Natural Person	cftcBatch/cftcForm102/relatedEntity@entityType
<del>58</del> -86	Consolidated Account Controller Optional Fields or Supplemental Fields Reported to LEI Provider	Question 3iv	Conditional. Required if <a href="#">information available AND</a> 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/relatedEntity@OptionalOrSuppFieldsSeparatelyReported

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<b>IF CONSOLIDATED ACCOUNT CONTROLLER IS A LEGAL ENTITY</b>						
<del>59</del> .87	Consolidated Account Controller Legal Entity Name	Question 3iv	Conditional. Required if <a href="#">information available</a> AND isOmnibus='N' AND isController='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Legal or registered name of the reportable account Controller		cftcBatch/cftcForm102/relatedEntity@legalEntityName
<b>IF CONSOLIDATED ACCOUNT CONTROLLER IS A NATURAL PERSON</b>						
<del>60</del> .88	Consolidated Account Controller Natural Person Last Name	Question 3iv	Conditional. Required if <a href="#">information available</a> AND isOmnibus='N' AND isController='Y' AND OptionalOrSuppFieIdsSeparatelyRepo	Surname of the natural person reportable account Controller		cftcBatch/cftcForm102/relatedEntity@lastName

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			rted='N'			
<del>61</del> <u>89</u>	Consolidated Account Controller Natural Person First Name	Question 3iv	Conditional. Required if <a href="#">information available</a> AND isOmnibus='N' AND isController='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Given or first in order name of the natural person reportable account Controller		cftcBatch/cftcForm102/relatedEntity@firstName
<del>62</del> <u>90</u>	Consolidated Account Controller Natural Person Middle Name	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N'			cftcBatch/cftcForm102/relatedEntity@middleName
<del>63</del> <u>91</u>	Consolidated Account Controller	Question 3iv	Conditional. Required if information			cftcBatch/cftcForm102/relatedEntity@nameSuffix

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Natural Person Suffix		available <u>AND isOmnibusAND isOmnibus='N'</u> AND isController='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N'			
<b>FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS</b>						
<u>64.92</u>	Consolidated Account Controller Street Address	Question 3iv	Conditional. Required if <u>information available AND isOmnibus='N'</u> AND isController='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Street address of the reportable account Controller		cftcBatch/cftcForm102/relatedEntity@street
<u>65.93</u>	Consolidated Account Controller Suite	Question 3iv	Conditional. Required if information available AND isOmnibus='N'	Suite of the reportable account Controller		cftcBatch/cftcForm102/relatedEntity@suite

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND isController='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'			
<del>66.94</del>	Consolidated Account Controller City	Question 3iv	Conditional. Required if <a href="#">information available</a> AND isOmnibus='N' AND isController='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'	City of the reportable account Controller		cftcBatch/cftcForm102/related Entity@city
<del>67.95</del>	Consolidated Account Controller State	Question 3iv	Conditional. Required if <a href="#">information available</a> AND isOmnibus='N' AND isController='Y' AND OptionalOrSuppFie IdsSeparatelyRepo rted='N'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm102/related Entity@state

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<del>68</del> <u>96</u>	Consolidated Account Controller Country	Question 3iv	Conditional. Required if <a href="#">information available AND</a> isOmnibus='N' AND isController='Y'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm102/related Entity@country
<del>69</del> <u>97</u>	Consolidated Account Controller Zip/Postal Code	Question 3iv	Conditional. Required if <a href="#">information available AND</a> isOmnibus='N' AND isController='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Zip/Postal code of the reportable account Controller		cftcBatch/cftcForm102/related Entity@postalCode
<del>70</del> <u>98</u>	Consolidated Account Controller Phone Number	Question 3iv	Conditional. Required if <a href="#">information available AND</a> isOmnibus='N' AND isController='Y' AND OptionalOrSuppFieIdsSeparatelyRepo	Phone Number of the reportable account Controller		cftcBatch/cftcForm102/related Entity@telephone

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			rtd='N'			
<u>71.99</u>	Consolidated Account Controller Email Address	Question 3iv	Conditional. Required if <a href="#">information available</a> AND isOmnibus='N' AND isController='Y' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Email address of the reportable account Controller		cftcBatch/cftcForm102/relatedEntity@email
<b>IF CONSOLIDATED ACCOUNT CONTROLLER IS A LEGAL ENTITY</b>						
<u>72.10</u>	Consolidated Account Controller Contact Last Name	Question 3iv	Conditional. Required if <a href="#">information available</a> AND isOmnibus='N' AND isController='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyRepo	Surname of the contact person for the owner		cftcBatch/cftcForm102/relatedEntity/contact@lastName

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			rtd='N'			
<del>73</del> .10	Consolidated Account Controller Contact First Name	Question 3iv	Conditional. Required if <a href="#">information available</a> AND isOmnibus='N' AND isController='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N'	First name of the contact person for the owner		cftcBatch/cftcForm102/relatedEntity/contact@firstName
<del>74</del> .10	Consolidated Account Controller Contact Middle Name	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Middle name of the contact person for the owner		cftcBatch/cftcForm102/relatedEntity/contact@middleName

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<del>75.10</del>	Consolidated Account Controller Contact Suffix	Question 3iv	Conditional. Required if information available AND isOmnibus='N' AND isController='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Suffix of the contact person for the owner		cftcBatch/cftcForm102/relatedEntity/contact@nameSuffix
<del>76.10</del>	Consolidated Account Controller Contact Job Title	Question 3iv	Conditional. Required if <u>information available</u> AND isOmnibus='N' AND isController='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Job title of the contact person at or related to the controller entity		cftcBatch/cftcForm102/relatedEntity/contact@titleOrPosition
<del>77.10</del>	Contact Relationship	Question 3iv	Conditional. Required if	Contact relationship to		cftcBatch/cftcForm102/relatedEntity/contact@relationship

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	to Consolidated Account Controller		<a href="#">information available</a> AND isOmnibus='N' AND isController='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N'	controller entity		
<del>78.10</del>	Consolidated Account Controller Contact Phone Number	Question 3iv	Conditional. Required if <a href="#">information available</a> AND isOmnibus='N' AND isController='Y' AND entityType='LE' AND OptionalOrSuppFieIdsSeparatelyReported='N'	Phone number of the contact person for the controller entity		cftcBatch/cftcForm102/relatedEntity/contact@telephone
<del>79.10</del>	Consolidated Account Controller Contact Email Address	Question 3iv	Conditional. Required if <a href="#">information available</a> AND isOmnibus='N' AND isController	Email address of the contact person for the controller entity		cftcBatch/cftcForm102/relatedEntity/contact@email

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			=‘Y’ AND entityType=‘LE’ AND OptionalOrSuppFieIdsSeparatelyReported=‘N’			
<del>80.10</del>	Consolidated Account Controller NFA ID	Question 3iv	Conditional. Required if information available AND isOmnibus=‘N’ AND isController=‘Y’ AND OptionalOrSuppFieIdsSeparatelyReported=‘N’	The identification number given to the controller entity by the National Futures Association		cftcBatch/cftcForm102/relatedEntity@NFAIdentifier
<del>81.10</del>	Consolidated Account Controller Legal Entity Identifier (LEI)	Question 3iv	Conditional. Required if information available AND isOmnibus=‘N’ AND isController=‘Y’ AND OptionalOrSuppFieIdsSeparatelyReported=‘Y’	The legal entity identifier (LEI) assigned to the controller entity by the LEI issuer		cftcBatch/cftcForm102/relatedEntity@legalEntityIdentifier

	Data Element	Form 102S Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<u>82.11</u>	Paired Swap Indicator	Question 4	<u>YesNo</u>	Indicates if response is related to paired swap activity		cftcBatch/cftcForm102/pairedSwapOrSwaptionActivity@isSwap
<u>83.11</u>	Paired Swaption Indicator	Question 4	<u>YesNo</u>	Indicates if response is related to paired swaption activity		cftcBatch/cftcForm102/pairedSwapOrSwaptionActivity@isSwaption
<u>84.11</u>	Paired Swaps and Swaptions Market Activity	Question 4	<u>YesNo</u>	Description of the nature of the counterparty's or customer's paired swaps and swaptions market activity		cftcBatch/cftcForm102/pairedSwapOrSwaptionActivity@description
<u>85.11</u>	Reporting Firm Authorization Indicator	Signature/Authentication	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	Y = authorized N = not authorized	cftcBatch/cftcForm102/contact@isAuthorizedRepresentative

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
				and representations are true and correct		
<b>86.11</b>	Authorized Representative Last Name	Signature/Authentication	Yes	Surname of the authorized representative		cftcBatch/cftcForm102/contact@lastName
<b>87.11</b>	Authorized Representative First Name	Signature/Authentication	Yes	Given or first in order name of the authorized representative		cftcBatch/cftcForm102/contact@firstName
<b>88.11</b>	Authorized Representative Middle Name	Signature/Authentication	Yes	Middle name of the authorized representative		cftcBatch/cftcForm102/contact@middleName
<b>89.11</b>	Authorized Representative Name Suffix	Signature/Authentication	Yes	Generation or name suffix of the authorized representative		cftcBatch/cftcForm102/contact@nameSuffix
<b>90.11</b>	Authorized Representative Position	Signature/Authentication	Yes	Job position of the authorized representative		cftcBatch/cftcForm102/contact@titleOrPosition
<b>91.11</b>	Authorized Representative Submitted on behalf of	Signature/Authentication	Yes	Reporting Firm Name 102 was submitted on behalf of		cftcBatch/cftcForm102@onBehalfOf

	<b>Data Element</b>	<b>Form 102S Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<b>92.12</b>	Date of Submission	Signature/Authentication	Yes	Date [indicated by the authorized representative] that the form was submitted to CFTC		cftcBatch/cftcForm102@submitDate

**Data Dictionary for Form 71 – Identification of omnibus accounts and sub-accounts<sup>20</sup>**

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<b>1.</b>	Form Number		Yes		71	cftcBatch/cftcForm71@formNumber
<b>2.</b>	Acknowledgment of Definitions Indicator	Acknowledgement of Definitions	Yes	Indicates whether the submitter acknowledged reading a list of	Y = Yes N = No	cftcBatch/cftcForm71@acknowledgeDefinitions

<sup>20</sup> 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>

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
				terms used in the form		
<b>3.</b>	New/Modified /Correction Indicator		Yes	<p>Indicates whether the omnibus account is:</p> <ul style="list-style-type: none"> <li>• New and being reported for the first time on a Form 71</li> <li>• Modified - previously reported on a Form 71 and being re-submitted because something has changed</li> <li>• Corrected - being reported in order to correct</li> </ul>	<p>N = new M = modified C = corrected</p>	cftcBatch/cftcForm71@informationType

	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				previously-submitted erroneous data		
4.	Account Number <sup>21</sup>	Section A	Yes	Account number of the omnibus volume threshold account (from Form 102B) or omnibus reportable sub-account (from Form 71) as identified on the referenced forms		cftcBatch/cftcForm71@accountNumber
5.	Form Type Origination	Section A	Yes	Form type of the form which identified the omnibus volume threshold account (Form 102B) or omnibus	102B = Form 102B 71 = Form 71	cftcBatch/cftcForm71@originalFormNumber

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<sup>21</sup> 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.

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
				reportable sub-account (Form 71)		
<b>6.</b>	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 sub-account, respectively		
<b>7.</b>	Reporting Market	Section A	Yes	The reporting contract market on which the identified account is traded		cftcBatch/cftcForm71@marketId
<b>8.</b>	Entity Type Indicator	Section A	Yes		LE=Legal Entity	cftcBatch/cftcForm71@entityType
<b>9.</b>	Name of Originator	Section A	Yes			cftcBatch/cftcForm71@legalEntityName
<b>10.</b>	Originator Street Address	Section A	Yes	Street Address of the omnibus account originator as indicated on the		cftcBatch/cftcForm71@street

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
				Form 102B or Form 71		
<b>11.</b>	Originator Suite	Section A	Conditional. Required if information available			cftcBatch/cftcForm71@suite
<b>12.</b>	Originator City	Section A	Yes	City of the omnibus account originator as indicated on the Form 102B or Form 71		cftcBatch/cftcForm71@city
<b>13.</b>	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
<b>14.</b>	Originator Country	Section A	Yes	ISO 3166-1 alpha-2 country code as indicated on the Form 102B or Form 71		cftcBatch/cftcForm71@country
<b>15.</b>	Originator Zip/Postal Code	Section A	Yes	Zip Code or Postal Code of the omnibus account		cftcBatch/cftcForm71@postal Code

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
				originator as indicated on the Form 102B or Form 71		
<b>16.</b>	Originator Phone Number	Section A	Yes	Phone Number of the omnibus account originator as indicated on the Form 102B or Form 71		cftcBatch/cftcForm71@telephone
<b>17.</b>	Originator Contact Last Name	Section A	Yes	Contact surname for the omnibus account originator as indicated on the Form 102B or Form 71		cftcBatch/cftcForm71/contact@lastName
<b>18.</b>	Originator Contact Middle Name	Section A	Conditional. Required if information available			cftcBatch/cftcForm71/contact@middleName
<b>19.</b>	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
<b>20.</b>	Originator Contact Suffix	Section A	Conditional. Required if			cftcBatch/cftcForm71/contact@nameSuffix

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			information available			
<b>21.</b>	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
<b>22.</b>	Contact Relationship to Originator	Section A	Yes	Contact relationship to the originator		cftcBatch/cftcForm71/contact@relationship
<b>23.</b>	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
<b>24.</b>	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
<b>25.</b>	Originator Website	Section A	Conditional. Required if information	URL of the website of the omnibus account originator		cftcBatch/cftcForm71@website

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			available			
<b>26.</b>	Originator NFA ID	Section A	Conditional. Required if information available	The identification number given to the originator by the National Futures Association		cftcBatch/cftcForm71@NFAIdentifier
<b>27.</b>	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
<b>28.</b>	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
<b>29.</b>	Sum of Allocations Reportable Trading Volume for Recipient Account	Section B – Question 2	Yes	For cases where trades were allocated, indicates whether the sum of allocations resulted in	Y = resulted in reportable trading volume N = did not result in reportable trading volume	cftcBatch/cftcForm71@isReportable

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Indicator			reportable trading volume for a recipient account on the specified date on the specified reporting market		
<b>REPORTABLE SUB-ACCOUNT OWNERSHIP AND CONTROL INFORMATION</b>						
<b>OMNIBUS REPORTABLE SUB-ACCOUNT INFORMATION</b>						
<b>30.</b>	Reportable Sub-Account Number	Question 3	Conditional. Required if isReportable='Y' AND tradesAllocated='Y'			cftcBatch/cftcForm71/relatedAccount@accountNumber
<b>31.</b>	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/relatedAccount@isOmnibus
<b>32.</b>	House or Customer Indicator	Question 3aaii	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	H = House C = Customer	cftcBatch/cftcForm71/relatedAccount@accountClass

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
				Sub-Account Omnibus Account is a house or customer account of the reporting firm		
<b>33.</b>	Reportable Sub-Account Omnibus Account Originator Indicator	Question 3a ii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y' THEN isOriginator = 'Y'	Indicates reporting Volume Threshold Account Omnibus Account originator	Y = Yes N = No	cftcBatch/ cftcForm71/relatedAccount/relatedEntity@isOriginator
<b>34.</b>	Reportable Sub-Account Omnibus Account Entity Type	Question 3a ii	Yes		LE=Legal Entity	cftcBatch/ cftcForm71/relatedAccount/relatedEntity@entityType
<b>35.</b>	Reportable Sub-Account Omnibus Account Originator Name	Question 3a ii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y'	Name of the reportable account Originator		cftcBatch/ cftcForm71/relatedAccount/relatedEntity@legalEntityName
<b>36.</b>	Reportable Sub-Account Omnibus	Question 3a ii	Conditional. Required if isReportable='Y'	Street address of the reportable account Originator		cftcBatch/ cftcForm71/relatedAccount/relatedEntity@street

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Account Originator Street Address		AND tradesAllocated='Y' AND isOmnibus='Y'			
<b>37.</b>	Reportable Sub-Account Omnibus Account Originator Suite	Question 3a ii	Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y'			cftcBatch/cftcForm71/relatedAccount/relatedEntity@suite
<b>38.</b>	Reportable Sub-Account Omnibus Account Originator City	Question 3a ii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y'	City of the reportable account Originator		cftcBatch/cftcForm71/relatedAccount/relatedEntity@city
<b>39.</b>	Reportable Sub-Account Omnibus Account Originator State	Question 3a ii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm71/relatedAccount/relatedEntity@state
<b>40.</b>	Reportable Sub-Account	Question 3a ii	Conditional. Required if	ISO 3166-1 alpha-2 country		cftcBatch/cftcForm71/relatedAccount/re

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Omnibus Account Originator Country		isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='Y'	code		latedEntity@country
<b>41.</b>	Reportable Sub-Account Omnibus Account Originator Zip/Postal Code	Question 3a ii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='Y'	Zip/Postal code of the reportable account Originator		cftcBatch/ cftcForm71/relatedAccount/re latedEntity@postalCode
<b>42.</b>	Reportable Sub-Account Omnibus Account Originator Phone Number	Question 3a ii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='Y'	Phone Number of the reportable account Originator		cftcBatch/ cftcForm71/relatedAccount/re latedEntity@telephone
<b>43.</b>	Reportable Sub-Account Omnibus Account Originator Contact Last Name	Question 3a ii	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

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<b>44.</b>	Reportable Sub-Account Omnibus Account Originator Contact First Name	Question 3a ii	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/relatedEntity/contact@firstName
<b>45.</b>	Reportable Sub-Account Omnibus Account Contact Middle Name	Question 3a ii	Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y' AND entityType='LE'	Middle name of the contact person for the Originator		cftcBatch/cftcForm71/relatedAccount/relatedEntity/contact@middleName
<b>46.</b>	Reportable Sub-Account Omnibus Account Contact Suffix	Question 3a ii	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/relatedAccount/relatedEntity/contact@nameSuffix

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
47.	Reportable Sub-Account Omnibus Account Originator Contact Job Title	Question 3a ii	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/relatedAccount/relatedEntity/contact@titleOrPosition
48.	Contact Relationship to Reportable Sub-Account Omnibus Account Originator	Question 3a ii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y' AND entityType='LE'	Contact relationship to the Originator entity		cftcBatch/cftcForm71/relatedAccount/relatedEntity/contact@relationship
49.	Reportable Sub-Account Omnibus Account Originator Contact Phone Number	Question 3a ii	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/relatedEntity/contact@telephone
50.	Reportable Sub-Account Omnibus Account Originator	Question 3a ii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y'	Email address of the contact person for the Originator entity		cftcBatch/cftcForm71/relatedAccount/relatedEntity/contact@email

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Contact Email Address		' AND isOmnibus='Y' AND entityType='LE'			
<b>51.</b>	Reportable Sub-Account Omnibus Account Originator Website	Question 3a ii	Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='Y' AND entityType='LE'	URL of the Originator's website		cftcBatch/ cftcForm71/relatedAccount/relatedEntity@website
<b>52.</b>	Reportable Sub-Account Omnibus Account Originator NFA ID	Question 3a ii	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/relatedEntity@NFAIdentifier
<b>53.</b>	Reportable Sub-Account Omnibus Account	Question 3a ii	Conditional. Required if information available AND	The legal entity identifier (LEI) assigned to the Originator entity		cftcBatch/ cftcForm71/relatedAccount/relatedEntity@legalEntityIdentifier

	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Originator Legal Entity Identifier (LEI)		isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='Y'	by the LEI issuer		
<b>NON-OMNIBUS REPORTABLE SUB-ACCOUNT OWNER(S)</b>						
54.	Reportable Sub-Account Owner Indicator	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' THEN isOwner='Y'	Indicates reporting Reportable Sub-Account account owner	Y = Yes N = No	cftcBatch/ cftcForm71/ relatedAccount/relatedEntity @isOwner
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
<b>IF REPORTABLE SUB-ACCOUNT OWNER IS A LEGAL ENTITY</b>						
56.	Reportable Sub-Account	Question 3bi	Conditional. Required if	Legal or registered name of the		cftcBatch/ cftcForm71/ relatedAccount/relatedEntity

	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Owner Legal Entity Name		isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE'	reportable sub-account owner		@legalEntityName
<b>IF REPORTABLE SUB-ACCOUNT OWNER IS A NATURAL PERSON</b>						
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 sub-account 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'	Given or first in order name of the natural person reportable sub-account owner		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @firstName

	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			AND isOwner='Y' AND entityType='NP'			
59.	Reportable Sub-Account Owner Middle Name	Question 3bi	Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP'	Middle name of the natural person reportable sub-account owner		cftcBatch/cftcForm71/relatedAccount/relatedEntity@middleName
60.	Reportable Sub-Account Owner Suffix	Question 3bi	Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y' AND entityType='NP'	Suffix of the natural person reportable sub-account owner		cftcBatch/cftcForm71/relatedAccount/relatedEntity@nameSuffix
<b>FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS</b>						

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
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 available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isOwner='Y'	Suite of the reportable sub-account owner		cftcBatch/cftcForm71/relatedAccount/relatedEntity@suite
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'	ISO 3166-2 geopolitical subdivision code;		cftcBatch/cftcForm71/relatedAccount/relatedEntity@state

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y'	1-3 alphanumeric characters		
<b>65.</b>	Reportable Sub-Account Owner Country	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm71/relatedAccount/relatedEntity@country
<b>66.</b>	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
<b>67.</b>	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

	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<b>IF REPORTABLE SUB-ACCOUNT OWNER IS A NATURAL PERSON</b>						
68.	Reportable Sub-Account Owner Email Address	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y'	Email address of the reportable sub-account owner		cftcBatch/cftcForm71/relatedAccount/relatedEntity@email
<b>IF REPORTABLE SUB-ACCOUNT OWNER IS A LEGAL ENTITY</b>						
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	Question 3bi	Conditional. Required if isReportable='Y' AND	First name of the contact person for the owner		cftcBatch/cftcForm71/relatedAccount/relatedEntity/contact@firstName

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

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			entityType='LE'			
<b>73.</b>	Reportable Sub-Account Owner Contact Job Title	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE'	Job title of the contact person for the ownership entity		cftcBatch/cftcForm71/ relatedAccount/relatedEntity/ contact@titleOrPosition
<b>74.</b>	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
<b>75.</b>	Reportable Sub-Account Owner Contact Phone Number	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N'	Phone number of the contact person for the ownership entity		cftcBatch/cftcForm71/ relatedAccount/relatedEntity/ contact@telephone

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			AND isOwner='Y' AND entityType='LE'			
<b>76.</b>	Reportable Sub-Account Owner Contact Email Address	Question 3bi	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y' AND entityType='LE'	Email address of the contact person for the ownership entity		cftcBatch/cftcForm71/ relatedAccount/relatedEntity/ contact@email
<b>77.</b>	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
<b>78.</b>	Reportable Sub-Account Owner NFA ID	Question 3bi	Conditional. Required if information available AND	The identification number given to the ownership entity by the		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @NFAIdentifier

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y'	National Futures Association		
<b>79.</b>	Reportable Sub-Account Owner Legal Entity Identifier (LEI)	Question 3bi	Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isOwner='Y'	The legal entity identifier (LEI) assigned to the ownership entity by the LEI issuer		cftcBatch/cftcForm71/relatedAccount/relatedEntity@legalEntityIdentifier
<b>NON-OMNIBUS REPORTABLE SUB-ACCOUNT CONTROLLER(S)</b>						
<b>80.</b>	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

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<b>81.</b>	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
<b>82.</b>	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 sub-account Controller		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @lastName
<b>83.</b>	Reportable Sub-Account Controller Natural Person First Name	Question 3bii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND	Given or first in order name of the natural person reportable sub-account Controller		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @firstName

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			isController='Y'			
<b>84.</b>	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 isController='Y'	Middle name of the natural person reportable sub-account Controller		cftcBatch/cftcForm71/relatedAccount/relatedEntity@middleName
<b>85.</b>	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
<b>86.</b>	Reportable Sub-Account Controller Street Address	Question 3bii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y'	Street address of the reportable sub-account Controller		cftcBatch/cftcForm71/relatedAccount/relatedEntity@street

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

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			' AND isOmnibus='N' AND isController='Y'			
<b>90.</b>	Reportable Sub-Account Controller Country	Question 3bii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N' AND isController='Y'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @country
<b>91.</b>	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
<b>92.</b>	Reportable Sub-Account Controller Phone Number	Question 3bii	Conditional. Required if isReportable='Y' AND tradesAllocated='Y' ' AND isOmnibus='N'	Phone Number of the reportable sub-account Controller		cftcBatch/cftcForm71/ relatedAccount/relatedEntity @telephone

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			AND isController='Y'			
<b>93.</b>	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
<b>94.</b>	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
<b>95.</b>	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

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
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 Controller NFA ID	Question 3bii	Conditional. Required if information available AND isReportable='Y' AND tradesAllocated='Y' AND isOmnibus='N' AND isController='Y'	The identification number given to the Controller entity by the National Futures Association		cftcBatch/cftcForm71/relatedAccount/relatedEntity@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	Y = authorized N = not authorized	cftcBatch/cftcForm71/contact@isAuthorizedRep

	<b>Data Element</b>	<b>Form 71 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
				representations submitted on this Form 71, and that information and representations are true and correct		
<b>99.</b>	Authorized Representative Last Name	Section C	Yes	Surname of the authorized representative		cftcBatch/cftcForm71/contact@lastName
<b>100.</b>	Authorized Representative First Name	Section C	Yes	Given or first in order name of the authorized representative		cftcBatch/cftcForm71/contact@firstName
<b>101.</b>	Authorized Representative Middle Name	Section C	Yes	Middle name of the authorized representative		cftcBatch/cftcForm71/contact@middleName
<b>102.</b>	Authorized Representative Name Suffix	Section C	Yes	Generation or name suffix of the authorized representative		cftcBatch/cftcForm71/contact@nameSuffix
<b>103.</b>	Authorized Representative Position	Section C	Yes	Job position of the authorized representative		cftcBatch/cftcForm71/contact@titleOrPosition
<b>104.</b>	Date of Submission	Section C	Yes	Date [indicated by the authorized representative] that the form was		cftcBatch/cftcForm71@submitDate

	Data Element	Form 71 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				submitted to CFTC		

### Data Dictionary for Form 40 – Statement of reporting trader<sup>22</sup>

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
1.	Form Number		Yes		40	cftcBatch/cftcForm40@formNumber
2.	Acknowledgment 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@acknowledgeDefinitions
3.	New/Modified /Correction		Yes	Indicates whether the reportable	N = New M = Modified	cftcBatch/cftcForm40@informationType

<sup>22</sup> 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>

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Indicator			trader is: <ul style="list-style-type: none"> <li>• New and being reported for the first time on a Form 40</li> <li>• Modified - previously reported on a Form 40 and being re-submitted because something has changed</li> <li>• Corrected - being reported in order to correct previously -submitted erroneous data</li> </ul>	C = Corrected	

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<b>REPORTING TRADER CONTACT INFORMATION</b>						
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@entityType
<b>IF REPORTING TRADER IS A LEGAL ENTITY</b>						
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@legalEntityName
<b>IF REPORTING TRADER IS A NATURAL PERSON</b>						
6.	Last Name of Reporting Trader	Question 1	Conditional. Required if entityType = 'NP'	Surname of the reporting trader		cftcBatch/cftcForm40@lastName
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@firstName
8.	Middle Name of Reporting Trader	Question 1	Conditional. Required if information available AND entityType = 'NP'	Middle name of the reporting trader		cftcBatch/cftcForm40@middleName
9.	Name Suffix of the	Question 1	Conditional. Required if	Generational or name suffix of the		cftcBatch/cftcForm40@nameSuffix

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Reporting Trader		information available AND entityType = 'NP'	reporting trader		
<b>FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS</b>						
<b>10.</b>	Street Address of Reporting Trader	Question 1	Yes	The street address of the reporting trader		cftcBatch/cftcForm40@street
<b>11.</b>	Suite Number of Reporting Trader	Question 1	Conditional. Required if information available	The suite number of the reporting trader		cftcBatch/cftcForm40@suite
<b>12.</b>	City of Reporting Trader	Question 1	Yes	The city of the reporting trader		cftcBatch/cftcForm40@city
<b>13.</b>	State of Reporting Trader	Question 1	Yes	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm40@state
<b>14.</b>	Country of Reporting Trader	Question 1	Yes	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm40@country
<b>15.</b>	Zip/Postal Code of Reporting Trader	Question 1	Yes	The zip code or postal code of the reporting trader		cftcBatch/cftcForm40@postal Code

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
16.	Phone Number of Reporting Trader	Question 1	Yes	The phone number of the reporting trader		cftcBatch/cftcForm40@telephone
17.	Email Address of Reporting Trader	Question 1	Yes	The email address of the reporting trader		cftcBatch/cftcForm40@email
18.	Website of Reporting Trader	Question 1	Conditional. Required if information available	The website of the reporting trader		cftcBatch/cftcForm40@website
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@NFAIdentifier
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@legalEntityIdentifier
21.	Name of Reporting Trader's Employer	Question 1	Yes	The name of the trader's employer		cftcBatch/cftcForm40@employerName
22.	Reporting Trader's Employer's	Question 1	Conditional. Required if information	The identification number given to the reporting		cftcBatch/cftcForm40@employerNFAIdentifier

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	NFA ID		available	trader's employer by the National Futures Association		
23.	Reporting Trader's Employer's Legal Entity Identifier	Question 1	Conditional. Required if information available	The legal entity identifier (LEI) assigned to the reporting trader's employer by the LEI issuer		cftcBatch/cftcForm40@employerLEI
<b>CONTACT INFORMATION – DERIVATIVES TRADING CONTACT PERSON</b>						
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

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
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
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	Question 2	Yes	Street Address of the contact person for the reporting trader's derivatives trading		cftcBatch/cftcForm40/contact@street

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Derivatives Trading					
<b>31.</b>	Suite Number of Contact for Reporting Trader's Derivatives Trading	Question 2	Conditional. Required if information available	Suite number of the contact person for the reporting trader's derivatives trading		cftcBatch/cftcForm40/contact@suite
<b>32.</b>	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
<b>33.</b>	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
<b>34.</b>	Country of Contact for Reporting Trader's Derivatives Trading	Question 2	Yes	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm40/contact@country
<b>35.</b>	Zip/Postal Code of Contact for	Question 2	Yes	Zip Code or postal code of the contact person for		cftcBatch/cftcForm40/contact@postalCode

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Reporting Trader's Derivatives Trading			the reporting trader's derivatives trading		
<b>36.</b>	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
<b>37.</b>	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
<b>38.</b>	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
<b>CONTACT INFORMATION - RISK MANAGEMENT OPERATIONS CONTACT PERSON</b>						
<b>39.</b>	Contact for Risk Management Operations of	Question 3	Yes	Indicates whether the contact information is regarding the Risk	Y = Yes N = No	cftcBatch/CftcForm40/contact@isRiskManagementPOC

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Reporting Trader			Management Operations of the reporting traders		
<b>40.</b>	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
<b>41.</b>	Last Name of Contact for Reporting Trader's Risk Management Operations	Question 3	Yes	Surname for reportable contact person		cftcBatch/cftcForm40/contact@lastName
<b>42.</b>	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
<b>43.</b>	Middle Name of Contact for Reporting Trader's Risk Management	Question 3	Conditional. Required if information available	Middle name for reportable contact person		cftcBatch/cftcForm40/contact@middleName

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Operations					
<b>44.</b>	Name Suffix of Contact for Reporting Trader's Derivatives Trading	Question 3	Conditional. Required if information available	Suffix for reportable contact person		cftcBatch/cftcForm40/contact@nameSuffix
<b>45.</b>	Street Address of Contact for Reporting Trader's Risk Management Operations	Question 3	Yes	Street Address for reportable contact person		cftcBatch/cftcForm40/contact@street
<b>46.</b>	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
<b>47.</b>	City of Contact for Reporting Trader's Risk Management Operations	Question 3	Yes	City for a reportable contact person		cftcBatch/cftcForm40/contact@city

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<b>48.</b>	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
<b>49.</b>	Country of Contact for Reporting Trader's Risk Management Operations	Question 3	Yes	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm40/contact@country
<b>50.</b>	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
<b>51.</b>	Phone Number of Contact for Reporting Trader's Risk Management Operations	Question 3	Yes	Phone Number for reportable contact person		cftcBatch/cftcForm40/contact@telephone
<b>52.</b>	Email Address of Contact for Reporting	Question 3	Yes	Email Address for reportable contact person		cftcBatch/cftcForm40/contact@email

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Trader's Risk Management Operations					
<b>53.</b>	NFA ID of Contact for Reporting Trader's Risk Management Operations	Question 3	Conditional. Required if information available	The identification number given to the contact by the National Futures Association		cftcBatch/cftcForm40/contact@NFAIdentifier
<b>CONTACT INFORMATION – INDIVIDUAL RESPONSIBLE FOR INFORMATION ON FORM 40</b>						
<b>54.</b>	Contact for Responsible Individual of Information on Form 40.	Question 4	Yes	Indicates whether the contact information is regarding the Individual Responsible for information on form40	Y = Yes N = No	cftcBatch/CftcForm40/contact@isFormInformationPOC
<b>55.</b>	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

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
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
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	Question 4	Yes	Street Address of the natural person contact for the reporting trader's Form 40		cftcBatch/cftcForm40/contact@street

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	40 Verification			verification		
<b>61.</b>	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 verification		cftcBatch/cftcForm40/contact@suite
<b>62.</b>	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
<b>63.</b>	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
<b>64.</b>	Country of Contact for Reporting Trader's Form 40 Verification	Question 4	Yes	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm40/cotnact@country
<b>65.</b>	Zip/Postal Code of Contact for Reporting Trader's Form	Question 4	Yes	Zip code or postal code of the natural person contact for the reporting trader's		cftcBatch/cftcForm40/contact@postalCode

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	40 Verification			Form 40 verification		
<b>66.</b>	Phone Number of Contact for Reporting Trader's Form 40 Verification	Question 4	Yes	Phone number of the natural person contact for the reporting trader's Form 40 verification		cftcBatch/cftcForm40/contact@telephone
<b>67.</b>	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
<b>68.</b>	NFA ID of Contact for Reporting Trader's Form 40 Verification	Question 4	Conditional. Required if information available	The identification number given to the contact by the National Futures Association		cftcBatch/cftcForm40/contact@NFAIdentifier
<b>OMNIBUS ACCOUNT CARRIER INFORMATION</b>						
<b>69.</b>	Customer Omnibus Account Indicator	Question 5	Yes	Indicates whether the reporting trader has a customer omnibus account with a futures commission	Y = Yes N = No	cftcBatch/cftcForm40@isOmnibusAccount

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
				merchant, clearing member, or foreign broker		
<b>70.</b>	Name of Omnibus Account Carrier	Question 5	Conditional. Required if isOmnibusAccount = 'Y'	For traders that have a customer omnibus account(s), the name of the futures commission merchant, clearing member, or foreign broker carrying the account(s) of the reporting trader		cftcBatch/cftcForm40/omnibus AccountCarrier@legalEntityName
<b>71.</b>	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
<b>72.</b>	Clearing Member 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@isCM

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				clearing member		
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 foreign broker	Y = Yes N = No	cftcBatch/cftcForm40/omnibusAccountCarrier@isFB
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@isForeignAffiliated
<b>FOREIGN GOVERNMENT AFFILIATION INFORMATION</b>						
75.	Foreign Government Name	Question 6	Conditional. Required if isForeignAffiliated = 'Y'	For reporting traders affiliated with foreign government(s), the name(s) of those foreign governments		cftcBatch/cftcForm40/foreignAffiliation@countryName
76.	Nature of Foreign Government Affiliation(s)	Question 6	Conditional. Required if isForeignAffiliated = 'Y'	An explanation of the nature of affiliation(s) between the		cftcBatch/cftcForm40/foreignAffiliation@relationship

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				reporting trader and the foreign governments listed		
<b>NON-DOMESTIC ENTITY INFORMATION</b>						
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@isForeignEntity
78.	Country of Organization	Question 7	Conditional. Required if isForeignEntity = 'Y'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm40/foreignLegalRegime@country
<b>OWNERSHIP STRUCTURE OF REPORTING TRADER</b>						
<b>PARENT / 10% OR GREATER OWNER OF THE REPORTING TRADER</b>						
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/relatedEntity@isParentOrOwner
80.	Parent Company	Question 8	Conditional. Required if isParentOrOwner	Indicates if the parent of the reporting trader is	Y = yes N = no	cftcBatch/cftcForm40/relatedEntity@isParentCompany

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			=‘Y’	a Parent Company		
<b>81.</b>	Parent Generation	Question 8	Conditional. Required if isParentOrOwner= ‘Y’ AND isParentCompany= ‘Y’	For each parent of the reporting trader, indicates the hierarchical level in the entity 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.	2 = Parent of a parent 1 = Direct parent of a reporting trader	cftcBatch/cftcForm40/relatedEntity@generation
<b>82.</b>	Parent or Owner Entity Type	Question 8	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/relatedEntity@entityType
<b>IF PARENT/OWNER IS A LEGAL ENTITY</b>						
<b>83.</b>	Parent or Owner Legal Entity Name	Question 8	Conditional. Required if entityType = ‘LE’	The legal entity name of each parent/owner of		cftcBatch/cftcForm40/relatedEntity@legalEntityName

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			AND isParentOrOwner = 'Y'	the reporting trader (if the parent is a legal entity)		
<b>IF PARENT/OWNER IS A NATURAL PERSON</b>						
<b>84.</b>	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/relatedEntity@lastName
<b>85.</b>	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/relatedEntity@firstName
<b>86.</b>	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/relatedEntity@middleName
<b>87.</b>	Parent or Owner Name Suffix	Question 8	Conditional. Required if information	Generational or name suffix of the parent/owner of		cftcBatch/cftcForm40/relatedEntity@nameSuffix

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			available AND If entitytype = 'NP' AND isParentOrOwner = 'Y'	the reporting trader		
<b>FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS</b>						
<b>88.</b>	Parent or Owner Street Address	Question 8	Conditional. Required if isParentOrOwner = 'Y'	Street address of each parent/owner of the reporting trader		cftcBatch/cftcForm40/relatedEntity@street
<b>89.</b>	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/relatedEntity@suite
<b>90.</b>	Parent or Owner City	Question 8	Conditional. Required if isParentOrOwner = 'Y'	City of each parent/owner of the reporting trader		cftcBatch/cftcForm40/relatedEntity@city
<b>91.</b>	Parent or Owner State	Question 8	Conditional. Required if isParentOrOwner = 'Y'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm40/relatedEntity@state

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
92.	Parent or Owner Country	Question 8	Conditional. Required if isParentOrOwner = 'Y'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm40/relatedEntity@country
93.	Parent or Owner Zip/Postal Code	Question 8	Conditional. Required if isParentOrOwner = 'Y'	Zip code or postal code of each parent/owner of the reporting trader		cftcBatch/cftcForm40/relatedEntity@postalCode
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/relatedEntity@telephone
95.	Parent or Owner Website	Question 8	Conditional. Required if information available	Website of each parent/owner of the reporting trader		cftcBatch/cftcForm40/relatedEntity@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/relatedEntity@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		cftcBatch/cftcForm40/relatedEntity@NFAIdentifier

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				Association		
98.	Parent or Owner Legal Entity Identifier	Question 8	Conditional. Required if information available AND isParentOrOwner = 'Y'	The legal entity identifier (LEI) assigned to the parent/owner of the reporting trader by the LEI issuer		cftcBatch/cftcForm40/relatedEntity@legalEntityIdentifier
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/relatedEntity@isPercent_10
<b>IF REPORTING TRADER IS A COMMODITY POOL</b>						
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/relatedEntity@isCommodityPool

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<b>101.</b>	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 of pool participant, indicates if the reported party is a principal of the operator of the commodity pool	Y = Yes N = No	cftcBatch/cftcForm40/relatedEntity@isPrincipal
<b>102.</b>	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/relatedEntity@isAffiliate

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<b>103.</b>	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 participant, indicates if the reported party is also a commodity pool operator of the commodity pool	Y = Yes N = No	cftcBatch/cftcForm40/relatedEntity@isCommodityPoolOperator
<b>104.</b>	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	Y = Yes N = No	cftcBatch/cftcForm40/relatedEntity@isPercent_25

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				Commission's regulations, indicates if the reported party has an ownership or equity interest of 25 percent or greater in the commodity pool		
<b>SUBSIDIARY OF THE REPORTING TRADER/PERSONS IN WHICH REPORTING TRADER HAS 10% OR GREATER OWNERSHIP INTEREST</b>						
105.	Subsidiary or Owned Indicator	Question 9	Yes, isSubsidiaryOrOwned = '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/relatedEntity@isSubsidiaryOrOwned
106.	Subsidiary Company	Question 9	Conditional. Required if isSubsidiaryOrOwned = 'Y'	Indicates if the reported party is a subsidiary of the reporting trader	Y = Yes N = No	cftcBatch/cftcForm40/relatedEntity@isSubsidiaryCompany
107.	Subsidiary Generation	Question 9	Conditional. Required if isSubsidiaryOrOwned = 'Y' AND	For each subsidiary entity of the reporting trader, indicates	-2 = Sub of a sub -1 = Direct sub of a reporting trader	cftcBatch/cftcForm40/relatedEntity@generation

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			isSubsidiaryCompany='Y'	the hierarchical level in the entity structure where the subsidiary entity is located. Direct subsidiaries of the trader have Generation = -1; subsidiaries of a Generation -1 parent (subs of a sub) have Generation = - 2 and so on.		
108.	Subsidiary or Owned Type Indicator	Question 9	Conditional. Required if isSubsidiaryOrOwned='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/relatedEntity@entityType
<b>IF SUBSIDIARY OR OWNED ENTITY IS A LEGAL ENTITY</b>						
109.	Subsidiary or Owned Entity Name	Question 9	Conditional Required if entityType = 'LE' AND isSubsidiaryOrOwned='Y'	Legal name of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedEntity@legalEntityName

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<b>IF SUBSIDIARY OR OWNED ENTITY IS A NATURAL PERSON</b>						
110.	Subsidiary or Owned Entity Last Name	Question 9	Conditional Required if entityType = 'NP' AND isSubsidiaryOrOwned = 'Y'	Surname of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedEntity@lastName
111.	Subsidiary or Owned Entity First Name	Question 9	Conditional Required if entityType = 'NP' AND isSubsidiaryOrOwned = 'Y'	Given or first in order name of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedEntity@firstName
112.	Subsidiary or Owned Entity Middle Name	Question 9	Conditional Required if available AND entityType = 'NP' AND isSubsidiaryOrOwned = 'Y'	Middle name of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedEntity@middleName
113.	Subsidiary or Owned Entity Name Suffix	Question 9	Conditional Required if available AND entityType = 'NP' AND isSubsidiaryOrOwned = 'Y'	Generational or name suffix of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedEntity@nameSuffix

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<b>FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS</b>						
114.	Subsidiary or Owned Entity Street Address	Question 9	Conditional. Required if isSubsidiaryOrOwned = 'Y'	Street address of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedEntity@street
115.	Subsidiary or Owned Entity Suite Number	Question 9	Conditional. Required if isSubsidiaryOrOwned = 'Y'	Suite number of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedEntity@suite
116.	Subsidiary or Owned Entity City	Question 9	Conditional. Required if isSubsidiaryOrOwned = 'Y'	City of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedEntity@city
117.	Subsidiary or Owned Entity State	Question 9	Conditional. Required if isSubsidiaryOrOwned = 'Y'	ISO 3166-2 geopolitical subdivision code; 1-3 alphanumeric characters		cftcBatch/cftcForm40/relatedEntity@state
118.	Subsidiary or Owned Entity Country	Question 9	Conditional. Required if isSubsidiaryOrOwned = 'Y'	ISO 3166-1 alpha-2 country code		cftcBatch/cftcForm40/relatedEntity@country
119.	Subsidiary or Owned Entity Zip/Postal	Question 9	Conditional. Required if isSubsidiaryOrOwned = 'Y'	Zip code or postal code of each subsidiary/owned		cftcBatch/cftcForm40/relatedEntity@postalCode

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Code		ed = 'Y'	entity of the reporting trader		
<b>120.</b>	Subsidiary or Owned Entity Phone Number	Question 9	Conditional. Required if isSubsidiaryOrOwned = 'Y'	Phone number of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedEntity@telephone
<b>121.</b>	Subsidiary or Owned Entity Website	Question 9	Conditional. Required if information available AND isSubsidiaryOrOwned = 'Y'	Website of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedEntity@website
<b>122.</b>	Subsidiary or Owned Entity Email Address	Question 9	Conditional. Required if isSubsidiaryOrOwned = 'Y'	Email address of each subsidiary/owned entity of the reporting trader		cftcBatch/cftcForm40/relatedEntity@email
<b>123.</b>	Subsidiary or Owned Entity NFA ID	Question 9	Conditional. Required if information available AND If entitytype = 'LE' AND isSubsidiaryOrOwned = 'Y'	The identification number given to the subsidiary/owned entity by the National Futures Association		cftcBatch/cftcForm40/relatedEntity@NFAIdentifier
<b>124.</b>	Subsidiary or Owned Entity Legal Entity	Question 9	Conditional. Required if information	The legal entity identifier (LEI) assigned to the		cftcBatch/cftcForm40/relatedEntity@legalEntityIdentifier

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Identifier		available AND If entitytype = 'LE' AND isSubsidiaryOrOwned = 'Y'	subsidiary/owned entity by the LEI issuer		
125.	10% Owned	Question 9	Conditional. Required if isSubsidiaryOrOwned = '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/relatedEntity@isPercent_10
126.	Subsidiary Principal/Affiliate Indicator	Question 9i	Conditional. Required if isSubsidiaryOrOwned = '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/relatedEntity@isPrincipal
127.	Subsidiary Affiliate	Question 9i	Conditional. Required if	For each subsidiary/owned	Y = Yes N = No	cftcBatch/cftcForm40/relatedEntity@isAffiliate

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
	Indicator		isSubsidiaryOrOwned = 'Y'	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 an affiliate of the operator of the commodity pool		
128.	Subsidiary Commodity Pool Operator Indicator	Question 9ii	Conditional. Required if isSubsidiaryOrOwned = '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/relatedEntity@isCommodityPoolOperator
129.	Subsidiary 25% Ownership	Question 9iii	Conditional. Required if isSubsidiaryOrOwned = 'Y'	For each reported party that is a commodity pool	Y = 25% or greater interest N = not 25% or	cftcBatch/cftcForm40/relatedEntity@isPercent_25

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Indicator		ed = 'Y'	and for which the trader is a limited partner, shareholder, or other pool 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	greater interest	
<b>CONTROL OF TRADING - PERSONS OTHER THAN REPORTING TRADER</b>						
<b>130.</b>	Controller Indicator	Question 10	Yes	List all persons outside of the reporting trader that control some or all of the derivatives trading	Y=Yes N=No	cftcBatch/cftcForm40/relatedEntity@isAlternateTradeControl

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				of the reporting trader – an “alternate trade controller”		
131.	Alternate Trade Controller Type Indicator	Question 10	Conditional. Required if isAlternateTradeControl = ‘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/relatedEntity@entityType
<b>IF ALTERNATE TRADE CONTROLLER IS A LEGAL ENTITY</b>						
132.	Alternate Trade Controller Legal Entity Name	Question 10	Conditional. Required if entityType = ‘LE’ AND isAlternateTradeControl = ‘Y’	Legal name of each alternate trade controller		cftcBatch/cftcForm40/relatedEntity@legalEntityName
<b>IF ALTERNATE TRADE CONTROLLER IS A NATURAL PERSON</b>						
133.	Alternate Trade Controller Last Name	Question 10	Conditional. Required If entityType = ‘NP’ AND isAlternateTradeControl = ‘Y’	Surname of each alternate trade controller		cftcBatch/cftcForm40/relatedEntity@lastName
134.	Alternate Trade	Question 10	Conditional, If entityType = ‘NP’	Given or first in order name of		cftcBatch/cftcForm40/relatedEntity@firstName

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

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

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<b>145.</b>	Alternate Trade Controller Email Address	Question 10	Conditional. Required if isAlternateTradeControl = 'Y'	Email address of each alternate trade controller		cftcBatch/cftcForm40/relatedEntity@email
<b>146.</b>	Alternate Trade Controller NFA ID	Question 10	Conditional. Required if information available AND isAlternateTradeControl = 'Y'	The identification number given to the alternate trade controller by the National Futures Association		cftcBatch/cftcForm40/relatedEntity@NFAIdentifier
<b>147.</b>	Alternate Trade Controller Legal Entity Identifier	Question 10	Conditional. Required if information available AND isAlternateTradeControl = 'Y'	The legal entity identifier (LEI) assigned to the alternate trade controller by the LEI issuer		cftcBatch/cftcForm40/relatedEntity@legalEntityIdentifier
<b>148.</b>	Alternate Trade Controller Some/All Indicator	Question 10	Conditional. Required If isAlternateTradeControl = '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/relatedEntity@toWhatDegree
<b>PERSONS FOR WHICH REPORTING TRADER CONTROLS TRADING</b>						
<b>149.</b>	Controlee Indicator	Question 11	Yes	List all persons for which the reporting trader controls some or	Y=Yes N=No	cftcBatch/cftcForm40/relatedEntity@isTradeControlFor

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				all of the derivatives trading (a "controlee")		
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/relatedEntity@entityType
<b>IF CONTROLEE IS A LEGAL ENTITY</b>						
151.	Controlee Legal Entity Name	Question 11	Conditional. Required if entityType = 'LE' AND isTradeControlFor = 'Y'	Legal name of each controlee		cftcBatch/cftcForm40/relatedEntity@legalEntityName
<b>IF CONTROLEE IS A NATURAL PERSON</b>						
152.	Controlee Last Name	Question 11	Conditional. Required if entityType = 'NP' AND isTradeControlFor = 'Y'	Surname of each controlee		cftcBatch/cftcForm40/relatedEntity@lastName
153.	Controlee First Name	Question 11	Conditional. Required if entityType = 'NP'	Given or first in order name of each controlee		cftcBatch/cftcForm40/relatedEntity@firstName

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			AND isTradeControlFor ='Y'			
<b>154.</b>	Controlee Middle Name	Question 11	Conditional. Required if information available AND entityType = 'NP' AND isTradeControlFor = 'Y'	Middle name of each controlee		cftcBatch/cftcForm40/relatedEntity@middleName
<b>155.</b>	Controlee Name Suffix	Question 11	Conditional. Required if information available AND entityType = 'NP' AND isTradeControlFor = 'Y'	Generational or name suffix of each controlee		cftcBatch/cftcForm40/relatedEntity@nameSuffix
<b>FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS</b>						
<b>156.</b>	Controlee Street Address	Question 11	Conditional. Required if isTradeControlFor = 'Y'	Street address of each controlee		cftcBatch/cftcForm40/relatedEntity@street
<b>157.</b>	Controlee Suite Number	Question 11	Conditional. Required if information available AND	Suite number of each controlee		cftcBatch/cftcForm40/relatedEntity@suite

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

	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/relatedEntity@email
165.	Controlee NFA ID	Question 11	Conditional. Required If Information Available AND isTradeControlFor =‘Y’	The identification number given to the controlee by the National Futures Association		cftcBatch/cftcForm40/relatedEntity@NFAIdentifier
166.	Controlee Legal Entity Identifier	Question 11	Conditional. Required If Information Available AND isTradeControlFor =‘Y’	The legal entity identifier (LEI) assigned to the controlee by the LEI issuer		cftcBatch/cftcForm40/relatedEntity@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/relatedEntity@toWhatDegree
<b>OTHER PERSON THAT INFLUENCES OR EXERCISES AUTHORITY OVER TRADING</b>						
168.	Influencer/ Authority	Question 12	Yes	List any other person(s) that	Y=Yes N=No	cftcBatch/cftcForm40/relatedEntity@isOtherInfluence

	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/Authority 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/relatedEntity@entityType
<b>IF REPORTABLE INFLUENCER IS A LEGAL ENTITY</b>						
170.	Influencer/Authority Legal Entity Name	Question 12	Conditional. Required if entityType='LE' AND isOtherInfluence='Y'	Legal name of each reportable influencer		cftcBatch/cftcForm40/relatedEntity@legalEntityName

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<b>IF REPORTABLE INFLUENCER IS A NATURAL PERSON</b>						
171.	Influencer/Authority Last Name	Question 12	Conditional. Required if entityType='NP' AND isOtherInfluence='Y'	Surname of each reportable influencer		cftcBatch/cftcForm40/relatedEntity@lastName
172.	Influencer/Authority First Name	Question 12	Conditional. Required if entityType='NP' AND isOtherInfluence='Y'	Given or first in order name of each reportable influencer		cftcBatch/cftcForm40/relatedEntity@firstName
173.	Influencer/Authority Middle Name	Question 12	Conditional. Required If Information Available AND entityType='NP' AND isOtherInfluence='Y'	Middle name of each reportable influencer		cftcBatch/cftcForm40/relatedEntity@middleName
174.	Influencer/Authority Name Suffix	Question 12	Conditional. Required If Information Available AND entityType='NP' AND isOtherInfluence='Y'	Generational or name suffix of each reportable influencer		cftcBatch/cftcForm40/relatedEntity@nameSuffix

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			Y'			
<b>FOR BOTH LEGAL ENTITIES AND NATURAL PERSONS</b>						
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

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

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
			isOtherInfluence='Y'	ty by the LEI issuer		
186.	Influencer/Authority 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/relatedEntity@toWhatDegree
<b>EXPRESS OR IMPLIED AGREEMENT - CONTACT INFORMATION</b>						
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/understanding with any person(s) not already listed.	Y = Yes N = No	cftcBatch/cftcForm40/relatedEntity@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/relatedEntity@entityType

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
				person		
<b>IF REPORTABLE PARTY IS A LEGAL ENTITY</b>						
<b>189.</b>	Reportable Party Legal Entity Name	Question 13	Conditional. Required if entityType='LE' AND isOtherAgreement='Y'	Legal name of each reportable party		cftcBatch/cftcForm40/relatedEntity@legalEntityName
<b>IF REPORTABLE PARTY IS A NATURAL PERSON</b>						
<b>190.</b>	Reportable Party Last Name	Question 13	Conditional. Required if entityType='NP' AND isOtherAgreement='Y'	Surname of each reportable party		cftcBatch/cftcForm40/relatedEntity@lastName
<b>191.</b>	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/relatedEntity@firstName
<b>192.</b>	Reportable Party Middle Name	Question 13	Conditional. Required If Information Available AND	Middle name of each reportable party		cftcBatch/cftcForm40/relatedEntity@middleName

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

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

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
<b>203.</b>	Reportable Party NFA ID	Question 13	Conditional. Required if Information available isOtherAgreement = 'Y'	The identification number given to the reportable party by the National Futures Association		cftcBatch/cftcForm40/relatedEntity@NFAIdentifier
<b>204.</b>	Reportable Party Legal Entity Identifier	Question 13	Conditional. Required if Information available isOtherAgreement = 'Y'	The legal entity identifier (LEI) assigned to the reportable party by the LEI issuer		cftcBatch/cftcForm40/relatedEntity@legalEntityIdentifier
<b>205.</b>	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/relatedEntity@toWhatDegree

	Data Element	Form 40 Question Number	Required	CFTC Description, Purpose or Instruction	Valid Values	XML
<b>THE FOLLOWING FORM 40 QUESTIONS REFERENCE DEFINITIONS AND SUPPLEMENTAL LISTS THAT APPEAR IN THE FORM 40 ATTACHED AS AN APPENDIX TO THE OCR FINAL RULE<sup>23</sup></b>						
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@isCommodityIndexTrader_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@isCommodityIndexTrader_manager
208.	CIT Long/Short	Question 14iia	Conditional. Required if	Indicates if the reporting trader	L = Long S = Short	cftcBatch/cftcForm40@commodityIndexExposure

<sup>23</sup> 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>

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
	Exposure Indicator		isCommodityIndex Trader_manager = 'Y'	[that is engaged in 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		

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
				representing commodities spanning multiple commodity groups).		
<b>209.</b>	Commodity Index Trading Start Date	Question 14iia	Conditional. Required if isCommodityIndexTrader_manager = 'Y' OR isCommodityIndexTrader_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@initiatedCommodityIndexTrading
<b>210.</b>	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
<b>211.</b>	Major Swap Participant Indicator	Question 16	Yes	Indicates if the reporting trader is a Major Swap	Y = Yes N = No	cftcBatch/cftcForm40@isSwap Participant

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
				Participant, as defined in § 1.3(qqq) of regulations under the Commodity Exchange Act		
<b>212.</b>	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/natureOfBusiness@businessSector
<b>213.</b>	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
<b>214.</b>	Other Description – Business Subsector	Question 17	No	Description of the subsector in the event that “Other” is selected.		cftcBatch/cftcForm40/natureOfBusiness@otherDescription
<b>215.</b>	Primary Subsector	Question 17	Conditional. Required if businessSubSector	In the event that more than one (sub)sector is	Y=Yes N=No	cftcBatch/cftcForm40/natureOfBusiness@isPrimary

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
			is not null.	listed, an indication of the (sub)sector primarily describes the nature of the reporting trader's business		
<b>216.</b>	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/natureOfBusiness@commodity
<b>217.</b>	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	See Appendix B of this Technical Document – Supplemental List II for valid submission codes	cftcBatch/cftcForm40/natureOfBusiness@commodityGroup

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
				markets (There is a supplementary list to select from in the form)		
<b>218.</b>	Other Description – Commodity/Commodity Group Traded	Question 18	No	A description of the commodity group and commodity in the event that the user selects “Other”.		cftcBatch/cftcForm40/natureOfBusiness@otherDescription
<b>219.</b>	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/natureOfBusiness@businessPurpose
<b>220.</b>	Individual Commodity Predominant Business Purpose Indicator	Question 19	Conditional Required if businessPurpose is not null.	If the reporting trader has more than one business purpose for trading in an individual	Y=Yes N=No	cftcBatch/cftcForm40/natureOfBusiness@isPrimary

	<b>Data Element</b>	<b>Form 40 Question Number</b>	<b>Required</b>	<b>CFTC Description, Purpose or Instruction</b>	<b>Valid Values</b>	<b>XML</b>
				commodity, indicates the predominant business purpose <sup>24</sup>		
<b>221.</b>	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
<b>222.</b>	Authorized Representative Last Name	Question 20	Yes	Surname of the authorized representative		cftcBatch/cftcForm40/contact@lastName
<b>223.</b>	Authorized Representative First Name	Question 20	Yes	Given or first in order name of the authorized		cftcBatch/cftcForm40/contact@firstName

<sup>24</sup> 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.

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

## 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**.



### 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 permission.

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.

#### Contact Information

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](mailto: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.

[AGREE >>>](#)

[DECLINE >>>](#)

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

Margaret Sweet  
Assistant Branch Chief  
Chicago Regional Office  
[msweet@cftc.gov](mailto: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

**REQUEST ACCOUNT CREATION FOR DATA SUBMISSION TO THE CFTC**  
Registration Restriction: [Email Confirmation Required.]

We recommend that you routinely change your password. 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; The CFTC reserves the right to modify, suspend, deactivate, terminate or delete any account that violates any part of **Submission Account Creation & User Registration Agreement**. Accounts are non-transferable.

Please enter the following information:

\*Requester first name:

\*Requester last name:

\*Company name:

\*Email address:

Email address must be the domain from which data submissions will be made.  
Third party email domains, e.g., hotmail, yahoo, will be rejected.

\*Confirm email address:

\*Telephone:

Fax:

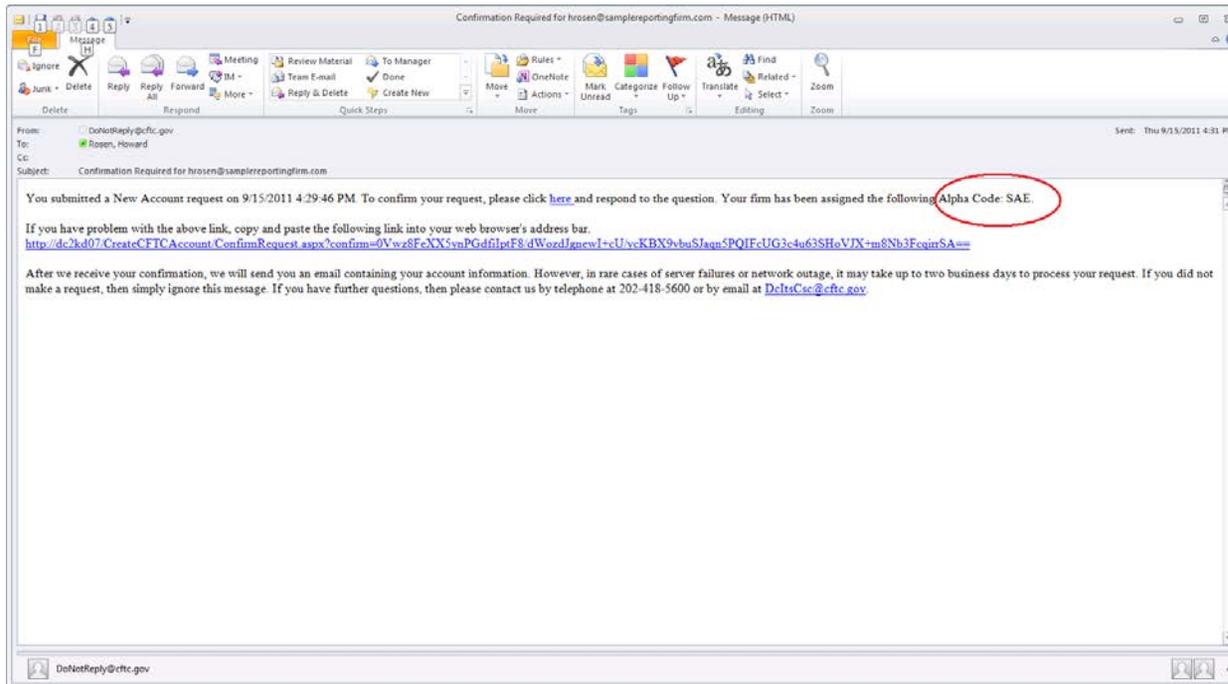
\*Required Field

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](#)

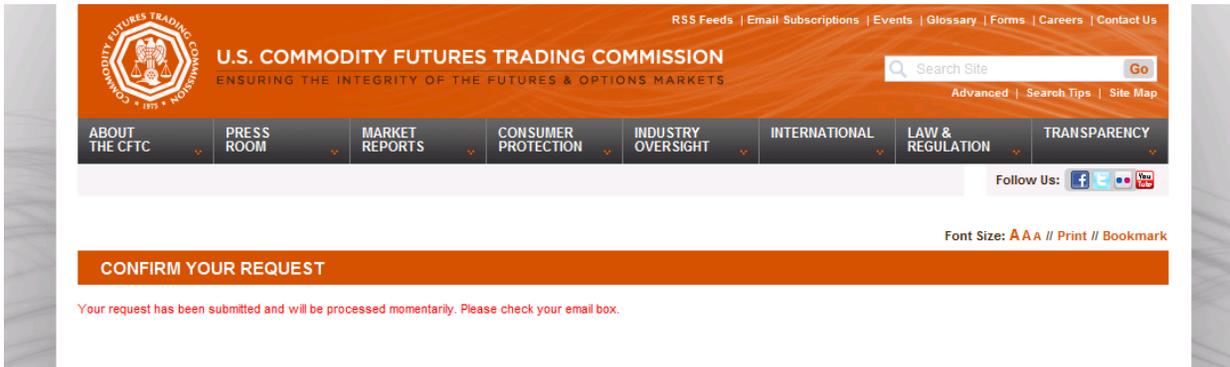
- Once the account creation is approved, you will be sent an email with a link to confirm the request. Note the **three-letter Alpha Code** that must be used for all data submissions made by this company to the CFTC.



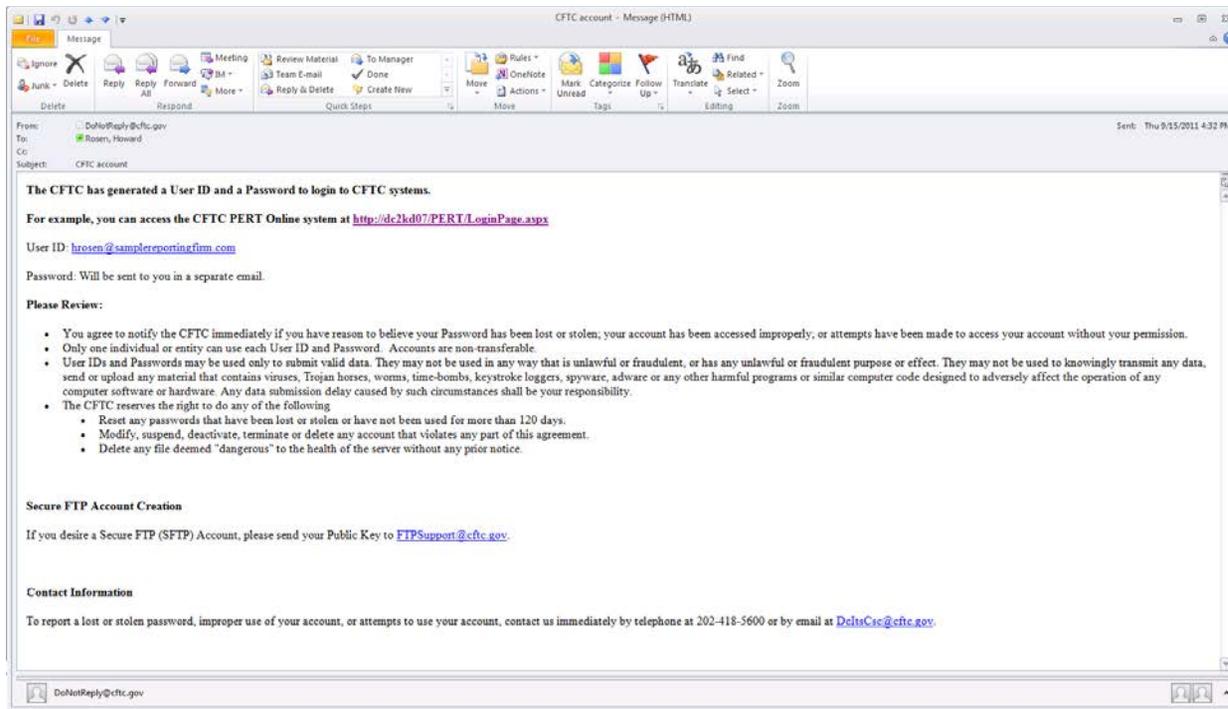
- Click the **confirmation link** in the email (or copy the URL into your web browser).
- On the **Confirm Your Request** screen, confirm the account creation request by typing in the **three-letter Alpha Code** supplied in the email and click **Confirm**.



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.



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](mailto:FTPSupport@cftc.gov).

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

## Appendix B: Supplemental Lists

### Supplemental List I: List of Business Sectors and Subsectors<sup>25</sup>

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

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<sup>25</sup> 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>

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>

<b>Business Sector Name</b>	<b>Business Sector Code</b>	<b>Business Subsector Name</b>	<b>Business Subsector Code</b>
Agriculture and Forestry	SA	Cooperative	SSK
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

<b>Business Sector Name</b>	<b>Business Sector Code</b>	<b>Business Subsector Name</b>	<b>Business Subsector Code</b>
Manufacturing, Refining and Processing	SE	Sugar and Confectionery Product Manufacturing	SSAD
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

<b>Business Sector Name</b>	<b>Business Sector Code</b>	<b>Business Subsector Name</b>	<b>Business Subsector Code</b>
Manufacturing, Refining and Processing	SE	Non-Precious Metal Processor	SSAV
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	SSBK

<b>Business Sector Name</b>	<b>Business Sector Code</b>	<b>Business Subsector Name</b>	<b>Business Subsector Code</b>
		Operator	
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

<b>Business Sector Name</b>	<b>Business Sector Code</b>	<b>Business Subsector Name</b>	<b>Business Subsector Code</b>
Arts, Entertainment, and Recreation	SL	Agents and Managers for Artists and Entertainers	SSCB
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

## 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 Indices	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

<b>Commodity Group Name</b>	<b>Commodity Group Code</b>	<b>Individual Commodity Name</b>	<b>Individual Commodity Code</b>
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

<b>Commodity Group Name</b>	<b>Commodity Group Code</b>	<b>Individual Commodity Name</b>	<b>Individual Commodity Code</b>
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

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

<b>Business Purpose Code</b>	<b>Business Purpose Name</b>	<b>Business Purpose Description</b>	<b>Business Purpose Example</b>
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

<b>Business Purpose Code</b>	<b>Business Purpose Name</b>	<b>Business Purpose Description</b>	<b>Business Purpose Example</b>
		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 bid-ask 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

<b>Business Purpose Code</b>	<b>Business Purpose Name</b>	<b>Business Purpose Description</b>	<b>Business Purpose Example</b>
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 Exposure	Reducing risk stemming from your proprietary holding or execution of swaps contracts through the use of futures/options markets	You trade interest rate swaps as part of your 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	