SECURITIES INDUSTRY
BUSINESS CONTINUITY TEST
Saturday, October 14, 2023

Coordinated by
Securities Industry and Financial Markets Association

VERSION DATE: 7/26/2023
Test Date: Saturday, October 14, 2023

Objective: Exercise and verify the ability of firms, markets and utilities to operate through a crisis using a combination of primary sites, backup sites, recovery facilities and backup communications capabilities across the industry based on the needs of the participants.

This is a test of market connectivity that includes some processing interactions but is not a full test of internal systems of firms and exchanges.
TEST SCOPE

- Test components
  - Equities
  - Fixed Income
  - Options
  - Payments
  - FX
  - Market Data
  - Treasury Auctions
  - Service Bureaus

- Firms will transmit dummy orders to markets and receive simulated execution reports and will conduct certain settlement and payment interactions.

- Firms will conduct test transactions with payment systems.

- Firms will receive and verify market data through connections at their backup sites.

- SIFMA will compile and publish aggregate test results based on input from providers (exchanges, utilities, service providers). Results for individual participants will remain strictly confidential.
TEST FORMAT

- The testing window will be open from 9:00 a.m. to 1:00 p.m. EST on 10/14 but providers may remain open for a reasonable period after 1:00 p.m. to resolve issues with individual participants if necessary. Providers may announce specific test windows within the 9:00 a.m. – 1:00 p.m. window based on their individual situations.

- Exchanges and markets may provide time for pre-test setup on test day prior to the test windows. Setup schedules will be announced in the documentation for each provider.

- Firms will follow the specific test scripts for each provider. Below is one example:

- Submit two orders for each of several designated symbols on each exchange/market using real symbols and real accounts. Firms will receive execution reports from the markets.
Providers may make their own specific modifications to the general test format per the scripts that they distribute ahead of the test.

Firms will conduct specified interactions with payment entities.

Firms will verify market data applications.

Price data and symbols to be used for each market will be provided to participants as test scripts prior to the test.

Exchanges and markets will purge all test data from systems prior to Monday market opening.
TEST SCRIPTS

WHAT ARE TEST SCRIPTS?

Test scripts provide an overview of test day procedures and how firms interact with test entities on the test day. Issues covered include structure of test message or test transaction and/or connectivity information.

HOW ARE TEST SCRIPTS DISTRIBUTED?

Test entities provide test scripts directly to firms who have registered to test against them.

This method of distribution allows for a confirmed handshake between both parties in a test connection, and allows participants to work out in advance that test participants and points of contact are known and understood by both firm and test entities, reducing missed contacts and errors on test day.

It also brings the test structure closer in line with the format of Reg SCI testing, with direct notification and sharing of test approaches between entities and their testers.
Reg. SCI - Overview

- Reg SCI testing will be held on October 14, in parallel with the SIFMA industry test, and will cover Equities, Options, and Clearance and Settlement.
- The 2023 Regulation SCI BC/DR test is designed to verify that Regulation SCI entities are able to demonstrate that they can support the maintenance of fair and orderly markets in the event the Regulation SCI entities’ business continuity and disaster recovery plans are activated.
- The 2023 Reg SCI test is not an end-to-end industry integrated test; it is a test for each individual SCI Entity to test its own BC/DR environments.
- Reg SCI entities will identify designated testers from among their participant firms who will be required to take part in Reg SCI testing with them.
- The 2023 Regulation SCI test is distinct from the classic SIFMA Industry test as outlined in this presentation.
- While Reg SCI test will cover a range of simulated market activities as mandated by regulation, the SIFMA industry test will retain the scope and format of prior years. Test entities determine their own test scope, ranging from simulated activity to custom test programs to bilateral connectivity testing.
SIFMA is working with Reg SCI test entities to develop a common framework for testing, including test timeline, test symbols and test structure.

Reg SCI entities will use this framework to develop test outlines for their SCI testing.

The test framework will be posted on SIFMA’s website once complete.

This framework only applies to Reg SCI testing.

Reg SCI entities who also participate in the Industry Test will provide test guidance through the Summary of Components document on the SIFMA website.

Firms who are not designated testers with a given Reg SCI entity can:

- Continue to test with them though the SIFMA Industry Test
- Arrange to voluntarily carry out Reg SCI testing with them by prior arrangement

The SIFMA industry test will continue to provide connectivity testing with market infrastructure and service providers who are not in scope for Reg SCI.
Register: Reg. SCI vs. SIFMA Test

- Reg SCI and the SIFMA Industry Test follow separate registration models
- Reg SCI test entities designate mandated testers bilaterally and communicate directly with them. All notifications should have been sent by July
- SIFMA Industry Test Participants chose which test entities they would like to connect with, and register with them through the SIFMA site.
  - Firms who are have been designated SCI testers by a given SCI entity do not need to also register for the SIFMA industry test with that entity
  - Firms do not use the SIFMA registration system to register for SCI testing
## Registration Guide - Reg. SCI vs. SIFMA Test

<table>
<thead>
<tr>
<th>Firm Situation</th>
<th>Registration Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Designated by a Reg SCI Entity to test with them</td>
<td>Work directly with that entity, do <strong>NOT</strong> register to test against them in SIFMA connectivity database</td>
</tr>
<tr>
<td>Want to test with DTCC family (NSCC, FICC, Omgeo), firm is not a DTCC designated Reg. SCI Tester</td>
<td>DTCC family is not participating in 2022 industry test due to Reg SCI conflicts; contact your relationship manager for alternative testing arrangements</td>
</tr>
<tr>
<td>Want to test with OCC, firm is not an OCC designated Reg. SCI Tester</td>
<td>Firms who were not designated to participate as RegSCI testers are encouraged to participate in the SIFMA Test in the same manner as OCC’s RegSCI designated participants. OCC encourages testing beyond the classic SIFMA industry test and we would like to see firms send and receive actual data during the test. Connectivity testing is a required pre-requisite for participation in the Industry Test.</td>
</tr>
<tr>
<td>Want to test with any other Reg SCI entity, firm is not designated for Reg SCI Testing with them</td>
<td>Register to test with them in SIFMA industry test through SIFMA registration website</td>
</tr>
<tr>
<td>Want to test with a non Reg SCI entity (i.e. market data, FX, payments)</td>
<td>Register to test with them in SIFMA industry test through SIFMA registration website</td>
</tr>
</tbody>
</table>
PRE-TEST DATES

- Common pre-test dates are be established in September and October. These are for both Reg SCI and industry testing. Some test entities use additional or other test dates, which are covered in test materials.

  - The proposed 2022 Pretest dates are:
    - 9/23/2023 (Primary)
    - 9/30/2023 (Secondary)

- Prior to the test, firms may test their connectivity with providers on these dates or on other dates as stipulated by each provider’s schedule and documentation.

- Many of the participating exchanges, markets and utilities will offer pre-testing on the two common dates, but for technical reasons some may not be able to do pre-testing on those dates. In those case, other dates will be published.
Pre-test and Test Day Contacts

- Test entities should distribute scripts and other information in advance of the test to the pre-test contact
- An individual can serve as both pre-test and test day contact, one individual can serve as pre-test and/or test day contact for multiple entities

Test registration now includes the ability to select test contacts as pre-test contacts as well as test day contacts.
# PROJECTED PARTICIPATING MARKET ENTITIES

## Equities
- BIDS Trading
- Cboe BYX, BZX, EDGA & EDGX
- Dealerweb ATS
- IEX
- Long Term Stock Exchange
- NASDAQ
- Nasdaq BX
- Nasdaq PSX
- NYSE (CLASSIC)
- NYSE ARCA
- NYSE Chicago
- MIAX Pearl Equities
- NYSE MKT (AMEX)
- OTC Link ATS
- UBS ATS

## Options
- BOX Options Exchange
- Chicago Board Options Exchange
- Cboe BZX Options
- CBOE C2 Options
- Cboe EDGX Options
- MIAX Option, Emerald & Pearl
- Montreal Exchange
- Nasdaq BX Options, GEMX, ISE, MRX, Options Market & PHLX
- NYSE AMEX
- NYSE/ARCA
- The Options Clearing Corporation
- CDCC

## Fixed Income
### Alternative Trading Systems
- BGC Partners
- Bloomberg TOMS
- BondDesk
- MarketAxess
- TMC Bonds LLC
- TradeWeb Markets LLC
- Trumid

### Inter-Dealer Brokers
- BrokerTec CME Group
- Dealerweb
- ICAP
- NASDAQ Fixed Income
- Tullet Prebon

## Clearing Banks
- BNY Mellon
- CDCC

## Market Data
- Bloomberg
- Factset
- Fidessa
- ICE Data Services/eSignal
- ICE Data Services/Interactive Data
- OTC Markets Group
- Refinitiv
- SIX Financial Information

## Service Bureaus
- Broadridge BPO
- Broadridge BPS
- Broadridge ICI
- Fidessa
- FIS Phase 3
- FIS Valdi
- FlexTrade Systems
- LavaFlow ECN
- Matrix Applications (TradeBlazer, Margin Calculator, and Qtix)
- BetaNXT (ex Refinitiv BETA)
- Shadow Financial Systems
- SS&C Technologies (Lightning)
- Talisys

## FX
- Bloomberg Tradebook
- Bloomberg FXGO
- CBOE FX
- CLS
- Refinitiv Fxall
- Traiana

## Clearing & Settlement
- *DTCC family not participating in 2023 due to Reg SCI conflicts*

## Payment Systems
- CHIPS
- SWIFT
- Fedwire
GENERAL TEST REQUIREMENTS

WHO MAY PARTICIPATE?

The test is open to all securities firms.

WHAT BACKUP SITES ARE TO BE USED?

The objective of the test is to have all participants operate from their backup locations to the greatest degree possible. It is intended that firms will activate backup 1) data center, 2) operations and 3) trading sites.

USING YOUR PRIMARY SITE INSTEAD?

If a firm elects to test with providers from their primary site, the firm must ensure that they test from their backup site at some other point during the year. The goal of the test is to provide all firms the opportunity to test their back-up to back-up connectivity with multiple providers on a single day.
WHAT STAFF IS REQUIRED FOR THE TEST?
Each participating organization will determine the number of employees necessary to conduct the test. There is no minimum or maximum staff size but, in keeping with the intent of the test, it is suggested that each firm assign some staff to their backup 1) data center, 2) operations and 3) trading sites.

HOW DOES AN ORGANIZATION REGISTER FOR THE TEST?
An online registration system will be available on the SIFMA website in June. Registrations must be submitted through this system by close of business Friday, October 6.

CAN FIRMS PARTICIPATE IN THE TEST THROUGH SERVICE BUREAUS?
Yes. A number of service bureaus will participate. A list of participating services bureaus is shown in the overall list of participating market entities. Clients of these service bureaus may participate providing that they have tested connectivity to the service bureau backup sites prior to the test.
WILL REGULATORS AND THE PRESS BE INVOLVED IN THE TEST?

Regulators will not participate directly in the test but have a significant interest in the overall results. SIFMA will brief the regulators prior to, during and after the test as required regarding the test process and the aggregate results. The press is not permitted to observe the conduct of the test.

WILL PARTICIPANT BRIEFING CALLS BE HELD?

There will be at three briefing calls prior to the test where participants may ask questions. Representatives of the exchanges, markets and utilities will be available on these calls. The 2022 calls will be held on:

- September 6, 2022, 3:00pm – 4:00pm EST
- September 19, 2022, 3:00pm – 4:00pm EST
- October 4, 2022, 3:00pm – 4:00pm EST

The briefing call schedule will be also be posted on the industry test web site.
TEST DOCUMENTATION

Detailed documentation is posted on the SIFMA website at:

https://www.sifma.org/resources/general/industry-wide-business-continuity-test/

This site will be updated periodically as additional materials are available.

Participant instruction packages will include the following:

1. Test Overview (this presentation document)
2. Summary of Test Components
QUESTIONS

Questions regarding the overall test:

Charles De Simone (SIFMA), cdesimone@sifma.org, 212-313-1262

Questions regarding individual exchanges, markets and utilities should be directed to the contacts listed in the Summary of Test Components for each organization.