

# PFRD

## Form PF: XML Upload

## About Form PF

The Private Fund Reporting Depository (PFRD) is a new electronic filing system that facilitates investment adviser reporting of private fund information via Form PF. The U.S. Securities and Exchange Commission (SEC) website provides detailed information regarding the new reporting requirements for certain advisers to private funds.

Most investment advisers (IAs) will not be required to file Form PF or use the PFRD system. The following is an excerpt from the Form PF describing, at a high level, who is required to file:

Complete and file Form PF if:

- You are registered or required to register with the SEC as an investment adviser, **or** you are registered or required to register with the Commodity Futures Trading Commission (CFTC) as a commodity pool operator or commodity trading advisor and you are also registered or required to register with the SEC as an investment adviser; **and**
- You manage one or more private funds; and
- You and your related persons, collectively, had at least \$150 million in private fund assets under management as of the last day of your most recently completed fiscal year.

If you do not meet the foregoing criteria, you do not need to file Form PF or use the PFRD system.

Questions regarding Form PF filing requirements or policy issues should be directed to the SEC at 202-551-6999 or FormPF@sec.gov.

Technical questions regarding the PFRD system should be directed to FINRA at 240-386-4848 or PFRDSupport@finra.org.

#### Content:

- Form PF Filing Types (pg. 2)
- XML Upload Methods (pg. 3)
- XML File Requirements and Schema Documentation (pg. 3)
- Form PF Manual XML Upload (pg. 3)
- <u>View XML Upload History</u> (pg. 4)
- Form PF Filing History (pg. 5)

## Form PF Filing Types

There are five Form PF filing types. Private Fund advisers may be required to file Form PF quarterly or annually (or both), depending on the SEC's reporting requirements. Filers specify the type of filing using the <FilingType> field at the top of their XML file (field values listed in table below).

Initial (PF-INIT)	You <u>are not</u> a large hedge fund adviser or large liquidity fund adviser. Submit your first Form PF <b>Annual</b> Filing for the period ended: mm/dd/yyyy <b>or</b> You <u>are</u> a large hedge fund adviser or large liquidity fund adviser. Submit your first Form PF <b>Quarterly</b> Filing for the period ended: mm/dd/yyyy	Choose this filing type to submit your Initial Form PF filing. For advisers filing Form PF for the first time, only these two filing op- tions will display. The Initial filing is intended to only be sub- mitted once. After an adviser submits their Initial filing, data for subsequent reporting periods should be filed using the Updating filing type.
Updating (PF-UPDATING)	Submit a Form PF <b>Annual</b> Update fil- ing for the period ended: mm/dd/yyyy <b>or</b> Submit a Form PF <b>Quarterly</b> Update filing for the period ended: mm/dd/yyyy	Choose this filing type to submit your an- nual or quarterly Form PF Update filing. The system will display the <b>Annual</b> or <b>Quarterly</b> Update filing option based on the adviser's Initial or Transition (if applica- ble) Form PF filing.
Amendment (PF-AMEND)	Submit a Form PF Amendment to a previously submitted PF filing for the period ended: mm/dd/yyyy	Choose this filing type to edit fund infor- mation previously submitted via Form PF for a particular reporting period. Also use this filing type when reporting on additional funds for a previously submitted reporting period end date.
Transition (PF-TRANS)	Transition to Annual Reporting	Choose this filing type to notify the SEC of your transition from <b>Quarterly</b> to <b>Annual</b> reporting. This filing type is only a notifica- tion that your firm will now be reporting annually, so it does not contain any fund data. (Note: In the opposite scenario of transi- tioning from <b>Annual</b> to <b>Quarterly</b> , no addi- tional Transition filing is needed. You would simply begin filing with the next quarter.)
Final (PF-FINAL)	Submit a Form PF Final Filing	Choose this filing type if your firm is no longer required to submit Form PF and this is will be your last Form PF filing. This filing type contains no fund data, so any necessary Update or Amendment filings should have already been submit- ted prior to your Final filing.

#### XML Upload Methods

To facilitate the filing of Form PF users may submit their Form PF filing as an XML upload. XML files may be uploaded manually via the PFRD web interface or programmatically via a machine-to-machine connection. Both upload methods require the firm have a username and password with access to PFRD.

The firm's Super Account Administrator (SAA) can entitle themselves and others at the firm to be able to submit Form PF via XML upload. Firms can also setup a separate Web Services account if they intend to submit exclusively through the web service. Please contact the Gateway Call Center at 240-386-4848 for more information about requesting a Web Services account.

#### XML File Requirements and Schema Documentation

The XML file, whether submitted manually or via machine-to-machine connection, must conform to the schema described in the Form PF Schema Documentation zip file.

The zip file contains sample XML files as well as a detailed reference guide for uploading XML files. For instructions on how to connect programmatically through the web service refer to the XML filing guide included with the zip file.

#### Form PF Manual XML Upload

The XML manual upload feature is accessible via the PFRD sitemap.

1. To upload an XML file, click the **Browse** button and select the appropriate XML file. Please note, PFRD does not require a specific file name format.

The e-mail address field is optional. If an email address is provided, an email will be sent (from <u>PFRDNotifications@FINRA.org</u>) to that email address once the XML filing has been processed by the system. The email message will indicate the success or failure of the filing submission attempt.

2. Click the Upload File button.

	? 🎒 Printer Friendly
Organization CRD#: 0000	Primary Business Name: INVESTMENT ADVISER
Organization SEC#: 801-00	
	XML Manual Upload
XML File Name (Select the Browse button to upload the appropriate Form PF XML file):	Browse
	ddress to receive an update on the status of your Form PF filing. When processing is complete, ate if further action is required.
Please make sure your email	l filtering system does not block or delete messages from PFRDNotifications@FINRA.org.
Email address (Optional):	
	Upload File

### View XML Upload History

PFRD firms can view a history of their Form PF XML submissions, whether uploaded via the PFRD interface or programmatically. Historical information includes detailed information regarding any missing or incomplete information required to successfully process their filing.

Click the **View Details** hyperlink in the Issues column to see a description of the validation or processing error. If the status is 'Successfully Processed' there will be no details to view.

Click the View hyperlink in the XML column to view a copy of the XML file that was uploaded.

**Note:** To view successfully processed XML filings as a web form, access the Form PF Filing History.

			? 🎒	Printer Friendly			
Organization CRD#: 0000		Primary Business Name: INVESTMENT ADVISER Full Legal Name: INVESTMENT ADVISER					
Organization SEC#: 801-00	001						
<b>XML Upload History 123</b> >> Records per Page: 25 Y Total Records: 55							
File Name	Upload Timestamp	Status	Issues	XML			
SAMPLE_01_25_2012.XML	02/27/2012 10:41:13	Successfully Processed		View			
SAMPLE 01 25 2012.XML	02/27/2012 10:37:34	Failed Schema Validation	View Details	View			
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Organization CRD#: 0000			Primary Business Name: INVESTMENT ADVISER				
Organization SEC#:801-00001			001	Full Legal Name: INVESTMENT ADVISER			
Issue	XML Upload Details         Issue       Issue         PFID       Section						
Number		PFID	Section				
1	Schema Validation			XML validation error: The 'EmailAddress' element is invalid - The value '212-310-5832' is invalid according to its datatype 'EmailType' - The Pattern constraint failed., exception: System.Xml.Schema.XmlSchemaValidationException: The 'EmailAddress' element is invalid - The value '212-310-5832' is invalid according to its datatype 'EmailType' - The Pattern constraint failed> System.Xml.Schema.XmlSchemaException: The Pattern constraint failed> End of inner exception stack trace, LineNumber: 43, LinePosition: 29			

### Form PF Filing History

The Form PF - Filing History page displays all Form PF filings submitted online or via XML upload (if applicable) to users with appropriate entitlement.

Click the **Filing ID** hyperlink to view a read-only version of any Form PF filing submitted online or via XML upload. For Form PF filings submitted via XML upload, click the **View** hyperlink to view the xml file.

								🕐 🎒 Printer Fi	riendly
Select PF Filing	Organization CRD#: 0000			Primary Business Name: INVESTMENT ADVISER					
New/Draft Web Filing	Organization SEC#: 801-00000			Full Legal Name: INVESTMENT ADVISER					
<ul> <li>Filing History</li> <li>XML Manual Upload</li> </ul>	Form PF - Filing History								
<ul> <li>XML Upload History</li> </ul>	Filing ID	Filer Category	Filing Type	Repor	ting Period	Reporting Quarter	Filing Submission Date	Submission Method	View XML
	586537	Quarterly	Updating	09/30	/2012	1	10/02/2012	Web	
	586118	Quarterly	Initial	06/30	/2012	4	07/01/2012	XML	View

**Tip:** While the automated upload email notifications are a useful tool, Filing History is considered to be the gold source for XML submission confirmation. Please see the <u>PFRD System Frequently Asked</u> <u>Questions</u> for additional information.