

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.

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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 Annual Filing for the period ended: mm/dd/yyyy or You <u>are</u> a large hedge fund adviser or large liquidity fund adviser. Submit your first Form PF Quarterly 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 options will display. The Initial filing is intended to only be submitted 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 Annual Update filing for the period ended: mm/dd/yyyy or Submit a Form PF Quarterly Update filing for the period ended: mm/dd/yyyy	Choose this filing type to submit your annual or quarterly Form PF Update filing. The system will display the Annual or Quarterly Update filing option based on the adviser's Initial or Transition (if applicable) 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 information 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 Quarterly to Annual reporting. This filing type is only a notification that your firm will now be reporting annually, so it does not contain any fund data. (Note: In the opposite scenario of transitioning from Annual to Quarterly , no additional 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 submitted 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.

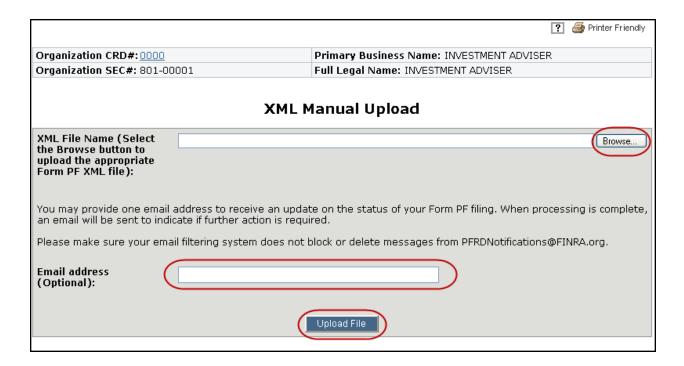
Form PF Manual XML Upload

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 PFRDNotifications@FINRA.org) 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.



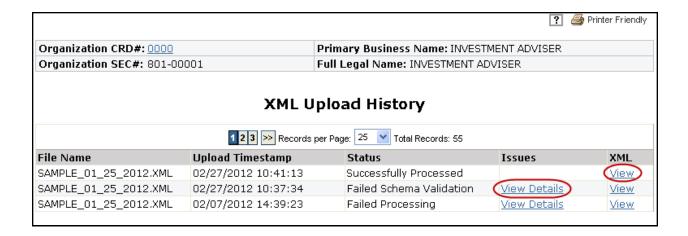
View XML Upload History

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.

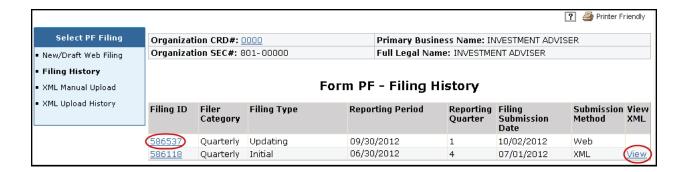


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Organization CRD#: 0000				Primary Business Name: INVESTMENT ADVISER
Organization SEC#:801-00001			001	Full Legal Name: INVESTMENT ADVISER
XML Upload Details Issue Issue PFID Section Issue Description				
Number 1	Schema Validation			XML validation 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.



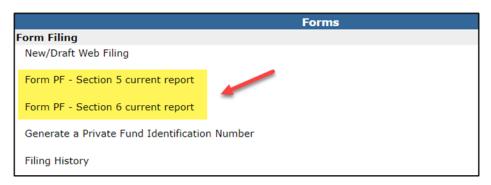
Tip: While the automated upload email notifications are a useful tool, Filing History is considered to be the gold source for XML submission confirmation. Please see the PFRD System Frequently Asked Questions for additional information.

Sections 5 and 6

Effective December 11, 2023, Form PF Sections 5 and 6 can be submitted via the FINRA Gateway. No new entitlement is necessary. Users that have entitlement to Form PF and IARD View Organization will be able to access Sections 5 and 6 using the following steps.

NOTE: There are no changes to the XML schema or upload mechanism for Form PF Sections 1-4.

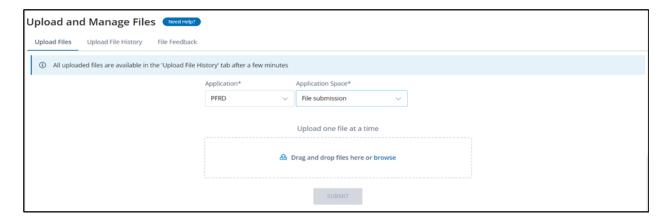
On the PFRD Main page, select one of the new options in the Forms column to navigate to the firm's profile in FINRA Gateway.



Once viewing the firm's Profile, click the Upload tab on the left navigation panel.



Select the Application as *PFRD* and Application Space as *File Submission*. Select a file that conforms to the schema and click the Submit button.



Uploaded files are available in the Upload File History tab after a few minutes and are stored for 30 days.

Processing results are available in the File Feedback tab.