

Washington, D.C. 20220

## **IMPORTANT NOTICE TO SDTM BATCH BSA E-FILERS:** New Secure Data Transfer Mode (SDTM) Server Deployment

#### THIS NOTICE APPLIES TO SERVER-TO-SERVER BATCH FILERS ONLY. PLEASE FORWARD TO YOUR IT DEPARTMENT FOR REVIEW.

**IMPORTANT:** On November 15, 2019, FinCEN distributed this notice via email to all SDTM batch filers. Based on your feedback, FinCEN has updated certain portions of this notice to include the following: (1) Clarification regarding batch file naming standard and (2) an FAQ at the end of this notice. FinCEN has also updated the deadline to transition to the new production servers by July 1st, 2020.

**March 19<sup>th</sup>, 2020** – The Financial Crimes Enforcement Network (FinCEN) has recently upgraded our Secure Direct Transfer Mode (SDTM) servers from IBM's Connect:Direct product to the new replacement product from IBM called Sterling File Gateway. The Sterling File Gateway product provides connectivity to current Connect:Direct users as well as Connect Enterprise users. This solution also provides Transport Layer Security at v1.2 and also a new connectivity option of SFTP over a non-standard port (10122).

The new Sterling File Gateway product will reside on new servers with new IP addresses, thus requiring client-side configuration changes in order to connect to the new servers.

Additionally, if you are a Connect:Direct user, you must receive and install a new server certificate in order to connect to the new SDTM servers. The new certificates for the Production/Disaster Recovery site and the User Test site will be provided by FinCEN to your filing institution <u>upon request</u>.

NOTE: The certificate for Production and Disaster Recovery site will be the same certificate chain (for failover purposes).

#### Next Steps...

- 1. Filing organizations must <u>verify connectivity</u> to the new servers/IP addresses before endto-end testing with FinCEN can begin.
- 2. Once connectivity is verified by the filing organization, submit a <u>support ticket</u> to the BSA E-Filing Help Desk with the following information:
  - "Summary New SDTM Server Transition"
  - Under Issue Classification, select "Other" for the Category
  - In the Description, please provide the following:
    - Filing Organization (FO) Enrollment Code
    - o Filing Organization (FO) Name
    - o SDTM User ID (e.g. sdtmbank)
    - Specify if this is for User Test or Production
    - Your preferred cutover date range for cutover



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BSA E-Filing Technical Support Request Form		
Complete the following form in order to generate Desk.	a support ticket with the BSA E-Filing Help	
Issue Classification		
Select, from the drop-down menus, the category that	best matches your issue/question.	
Category*	Subcategory	
Other 🗸	$\checkmark$	
Form Type V Issue Description Enter a detailed description of the issue/question for y	ukish yan ara sashing anistanaa	
Description*	which you are seeking assistance.	
Summary - New SDTM Server Transition; FO Enroll SDTM User ID - sdtmbank; Environment - User Test		
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Sample Support Request Form

3. Once your ticket is received, FinCEN will contact you to schedule time to validate connectivity to the new SDTM servers and to test the file transfer process via the new Sterling File Gateway product. We are targeting to complete user transition to the new SDTM servers by July 1st, 2020 for both the production environment and user test environments.

#### **Verify Connectivity**

Please verify connectivity to the new IPs (click <u>here</u> to view new IPs) over the following ports based on your connection type (this can done via telnet without access credentials):

Connection Type	Port
Connenect:Direct with Secure+ (over the internet)	1364
Connect:Direct (connecting thru a VPN tunnel)	1364 (or currently used port)
Connect Enterprise (ftp over VPN tunnel)	10021**
SFTP (a public ssh key can be provided by filer)	10122 ***

\*\* 10021 – 10099 with port 10021 being the control port and 10022 – 10099 being the data ports.

\*\*\* If this access is required, please contact the BSA E-Filing Help Desk for the appropriate request form.

**IMPORTANT**: Please do not change over to the new DNS entry until your access has been granted by FinCEN.



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## **IP Address Details per E-Filing Environment**

## **Production Site**

Purpose	Current DNS Name	New DNS Name	Current IP	New IP
SDTM Public IP	sdtm.fincen.treas.gov	sdtm.fincen.gov	166.123.218.125	166.123.230.35
SDTM Server Outbound IP Address	N/A		166.123.218.120	166.123.230.35
SDTM Server	N/A		166.123.218.125	166.123.230.35
VPN Endpoint	N/A		166.123.208.198	166.123.208.198

## **Disaster Recovery Site**

Purpose	DNS Name	New DNS Name	Current IP	New IP
SDTM Public IP	sdtm.fincen.treas.gov	sdtm.fincen.gov	164.95.95.125	164.95.230.35
SDTM Server Outbound IP Address	N/A		164.95.95.120	164.95.230.35
SDTM Server	N/A		164.95.95.125	164.95.230.35
VPN Endpoint	N/A		164.95.95.4	164.95.95.4

## **User Test Site**

Purpose	DNS Name	New DNS Name	Current IP	New IP
SDTM Public IP	sdtmut.fincen.treas.gov	sdtmut.fincen.gov	166.123.218.126	166.123.230.128
SDTM Server Outbound IP Address	N/A		166.123.218.120	166.123.230.128
SDTM Server	N/A		166.123.218.126	166.123.230.128
VPN Endpoint	N/A		166.123.208.198	166.123.208.198

## **Transition Requirements**

In order to prepare for the transition to the new configuration, please have your network team and application developers review/adhere to the following requirements:

1. Ensure the new IP addresses (above) are included in your system routers, firewalls, and/or VPN devices in order to ensure connectivity to the new servers. NOTE: The connection ports are NOT changing.



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2. <u>At least 2 weeks prior to server cutover</u>, ensure that incoming batch files to the <u>existing</u> servers adhere to the following naming standards, as FinCEN <u>will be validating</u> the submission naming convention as part of this update:

File Type	Naming Standard	
CTR Batch (XML)	CTRXST. <unique_value>.<sdtm_uid>.xml</sdtm_uid></unique_value>	
SAR Batch (XML)	SARXST. <unique_value>.<sdtm_uid>[.xml .zip]</sdtm_uid></unique_value>	
DOEP Batch (XML)	DOEPXST. <unique_value>.<sdtm_uid>.xml</sdtm_uid></unique_value>	
FBAR Batch (XML)	FBARXST. <unique_value>.<sdtm_uid>.xml</sdtm_uid></unique_value>	
8300 Batch (XML)	8300XST. <unique_value>.<sdtm_uid>.xml</sdtm_uid></unique_value>	

Position	Description	Requirement
Form type	Form type being submitted (e.g. CTRXST)	Form type required in 1 <sup>st</sup> position (case sensitive).
	Filename delimiter	Delimiter required.
Unique value	Value determined by filer ( <u>must not</u> contain periods or spaces)	Value required in 2 <sup>nd</sup> position (unique date-timestamp recommended)
•	Filename delimiter	Delimiter required.
SDTM_UID**	The User ID associated with the SDTM account	Complete SDTM_UID required in 3 <sup>rd</sup> position (case sensitive).
•	Filename delimiter	Delimiter required.
xml   zip	File extension	Extension required (not case sensitive). "zip" only applies to SARXST.

NOTE: The above naming standard has been added to all XML User Guides.

**\*\*NOTE**: You can verify your filing organization's SDTM\_UID by having a Supervisory User for your organization login to the BSA E-Filing System and select "Manage Users."

3. For Connect Enterprise users, ensure your system can retrieve BSA E-Filing acknowledgements from the NEW mailbox/Inbox folder on the system. This can be verified once you have be granted access to new environment (Note: your mailbox will have the same name as your SDTM\_UID). If you are signed up to receive the MESSAGES.XML file, this file will also be placed in your Inbox.

#### **Additional Support**

If you have any questions regarding this notice, please direct them to the BSA E-Filing Help via our <u>Support Request Form</u>. The Help Desk hours of operation are M-F 8:00 AM to 6:00 PM, Eastern Time (closed on federal holidays).



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#### **Frequently Asked Questions**

# 1. How will my filing institution implement the new IP addresses if a 3<sup>rd</sup> party vendor transmits the BSA data on behalf of the filing institution?

The filer of the batch (in this case, the 3<sup>rd</sup> party vendor) will implement the new IP addresses. The filing institution must work with their 3<sup>rd</sup> party vendor to test connectivity.

#### 2. How do I obtain the SFTP request form?

The filer must contact the BSA E-Filing Help via the <u>Support Request Form</u> to obtain the SFTP request form.

#### 3. How will I provide my public ssh key to FinCEN?

The filer will provide to FinCEN directly via email with their completed STFP request form.

#### 4. Are all SDTM accounts in the User Test system updated/created?

Yes, all existing accounts have been updated/created in the User Test system. New User Test accounts will be created in the new environment upon request by the filer. New User Test account will NOT be created in the existing/old environment.

#### 5. Am I required to test connectivity to the new IPs in the User Test system?

Although it is not required, FinCEN encourages filers to test connectivity to the new IPs in the User Test system before testing in the Production system. If the file naming convention currently in use by the filer must be updated to match the filename requirements in this notice, filer's should test in User Test before going live to production (in addition to testing batch upload, filers should also ensure that they are able to retrieve the corresponding acknowledgement file as well as the messages.xml file). A separate support ticket should be created for account creation requests for both User Test and Production systems.

# 6. What should I put in my support ticket for my "preferred cutover date range"? What is the purpose of this cutoff date if the deadline is March 2020?

FinCEN's original goal was to migrate a majority of SDTM filers to the new production servers by March 2020; however, this **deadline has been extended to July 1st, 2020**, as we continue to work with filers on a case-by-case basis to ensure a smooth and timely transition.