#### **Certification Transaction Level Report**

#### I. Overview

The Certification Transaction Level Report (CTLR) is a proposed requirement for CDFI Certification Applicants, and those certified CDFIs that are not current Financial Assistance (FA) recipients and therefore do not submit a full Transaction Level Report (TLR) to the CDFI Fund. As an administrative efficiency the CTLR data collection is being submitted for public comment under the Annual Certification and Data Collection Report (ACR) OMB control number 1559-0046. Please note that the CTLR is intended to support both the revised Certification Application (see related OMB 1559-0028) and the ACR. The CTLR will be submitted using the CDFI Fund's Awards Management and Information System (AMIS).

The data collection requires transactional reporting by Certification Applicants of new originations closed in the last 12 months and, for Certified CDFIs that are not current active FA recipients, of new originations closed during the most recent complete fiscal year. The CTLR provides a method to evaluate the extent to which certified CDFIs serve qualified Investment areas and underserved populations. The transaction data collection includes 11 data points necessary to determine which newly originated loans or investments are deployed to a CDFI's proposed or approved Target Market(s), which includes all qualified Investment Areas and approved "targeted populations".

Table 1 below provides the data points to be collected through AMIS and used in conjunction with the CDFI Information Mapping System (CIMS) for the basic transactional report that all Applicants and certified, non-award recipient CDFIs must report. Table 2 provides requirements for on specific data points in Table 1. Please note that there are other data collection tables detailed in Section II for Financial Services and in Section III for Loan Purchases. For a complete CTRL, including detailed guidance, see Appendix A.

	Data Point	Description	Data Type
1.	Originator Transaction ID*	A loan number or tracking number unique to each financial note of each CDFI	Alpha-numeric
2.	Date Originated*	Date the legally binding note was signed by the borrower/investee in favor of the lender/investor	Date (mm/dd/yyyy)
3.	Loan/Equity Investment Amount*	Dollar amount of the loan/equity investment	Numeric/Non-Negative
4.	Transaction Purpose*	The primary purpose of the financial note	Drop down of loan purpose

# Table 1: CTLR Data on new originations to be collected through the Certification Application andAnnual Certification and Data Collection Report

	Data Point	Description	Data Type
5.	Transaction Type*	Type of transaction for the financial note	Drop down of type
6.	Other Targeted Populations (OTP)*	Select from drop down the Other Targeted Population(s) served by the transaction	Drop down of OTP Type
7.	Project FIPS <sup>1</sup> Code*	11-digit census tract FIPS code generated by geocoding the project address to indicate the project location	Text Format
8.	Project Latitude <sup>+</sup>	X coordinate location (latitude) of the project	Numeric
9.	Project Longitude <sup>+</sup>	Y coordinate location (longitude) of the project	Numeric
10.	Investment Area (IA)*	Binary response (derived from 7 above) indicating whether the transaction is in an eligible Investment Area	FIPS Code Qualified (Yes/No)
11.	Low-Income Targeted Population (LITP)*	Binary response derived from Census Block Group coding indicating whether the transaction serves a Low-Income Targeted Population	12-digit Census Block Group Qualified (Yes/No)

• Mandatory fields indicated by an asterisk (\*)

• Conditionally required fields indicated by a dagger (†)

#### Data Requirements

The table below describes the data requirements and validations needed for the proper coding of specific transactional data for input into the AMIS system for CTLR reporting.

#### Table 2: Specific Requirements for Select CTLR Data

	Data Point	Requirement
4.	Transaction Purpose*	Select from drop-down options for six primary lines of business (see below for details)
5.	Transaction Type*	Select from the drop down: term loan, equity investment, line of credit, debt with equity, loan guarantee, other.
6.	Other Targeted Populations (OTP)*	If the entity serves an OTP Target Market, select from the drop down the OTP type of the borrower/investee, based on methods approved by the CDFI Fund to code transactions or accounts based

<sup>&</sup>lt;sup>1</sup> The Federal Information Processing Standards (FIPS) code uniquely identifies states and counties and county equivalents and census tracts in the United States, certain U.S. possessions, and certain freely associated states.

Data Point	Requirement
	on data as OTP (e.g. language used in loan or account application forms, surnames, etc.). For cases where the end users may be designated as an OTP, select
	OTP-End User.
7. Project FIPS <sup>2</sup> Code*	Use the Community Investment Mapping System (CIMS) to enter and geocode all appropriate transaction addresses (see Part V below). This will identify each transaction's location by census tract and generate an 11-digit census tract FIPS code and x/y coordinates.
	Please note that to protect confidential information, CIMS will NOT save any addresses and will return a file with only valid FIPS codes and x/y coordinates for each record. Note that the x/y coordinates will be temporarily retained to run Low-Income Targeted Population Census Block coding if the user elects to use this functionality to determine LITP status.
	If the address cannot be geocoded, or is a P.O. Box, then the organization should enter the project transaction's latitude and longitude that is confirmed by GPS. Please note that geocoding a P.O. Box will yield an inaccurate census tract result.
10. Investment Area (IA)*	Investment Area (IA) transactions are identified by selecting and completing in AMIS the CTLR address template (see detailed instructions below). This file will be uploaded into the CIMS geocoding system, which will generate an output file that identifies which transactions fall within qualified IAs. If the organization uses its own loan processing and geocoding system, please ensure that the latitude and longitude is provided in the upload file as a validation check for qualified IAs. If you use the AMIS system, CIMS will generate an output file with the latitude and longitude (x/y coordinates) of transactions, which can be used to check if they qualify as LITP eligible. Note that in order to protect confidential information, the transactional address and latitude and longitude data will be purged from the CIMS system once the two-step geocoding process is completed.

<sup>&</sup>lt;sup>2</sup> The Federal Information Processing Standards (FIPS) code uniquely identifies states and counties and county equivalents and census tracts in the United States, certain U.S. possessions, and certain freely associated states.

Data Point	Requirement
11. Low-Income Targeted Population (LITP)*	First, an entity may code loans as LITP through its own loan processing system. Such coding should be based on the collection of income data per the CDFI Fund's Regulations and the CDFI Fund's approved LITP income verification process. For cases where the CDFI Fund has approved an entity's method to determine LITP End- Users, that method can to be used to designate transactions as long as there is supporting documentation. The transaction file should be validated and saved in the organization's pre-certified account (see below).
	Second, an entity may use an approved proxy method, which utilizes the CIMS Census Block Group LITP geocoder to determine which transactions may be designated as LITP. To perform this geocoding function in AMIS, select the LITP Census Block Group template generated by the initial CIMS geocoding process. The CIMS system will use the x/y coordinates of these transactions to code them at the 12-digit census block level, which will then identify transactions (or financial services accounts) that may be designated as LITP qualified.3 Once the LITP status has been determined, the CIMS system will purge the x/y coordinates from the system so that confidential information is protected.

Once all records have been pre-certified and validated, the organization should submit all of its records. The system will then generate a report for each Applicant or certified CDFI that provides an overall tabulation of the proportion of its new originations that serve qualified Investment Areas and/or Targeted Populations based on the Applicant's or CDFI's proposed or approved Target Market(s).

AMIS will auto-populate the organization-level data described below in Table 3.

<sup>&</sup>lt;sup>3</sup>This proxy LITP method provides a standardized approach for determining LITP status that overcomes a data limitation that many CDFIs confront when attempting to implement the statutory guidance for collecting household income adjusted for family size. With the exception of mortgage loans, CDFIs and other lenders underwriting consumer and business loans typically do not collect information on family or household income adjusted for family size, which means they cannot readily categorize whether the loan meets the statutory requirements for a Low-Income Targeted Population. The LITP Census Block method provides an approved alternative approach for coding transactions that constitutes a safe harbor.

Data Point	Description	Data Type
12. Org ID	AMIS ORG ID	Auto-populated
13. Organization Name	Full name of the organization	Auto-populated
14. Institution Type	Financial institution type (should align with Organizational Profile option selected)	Auto-populated

#### Table 3: CDFI Organization-Level Data Points Necessary for Analysis

#### **CTLR Reporting and Precertification Process**

The CTLR reporting and precertification process will allow reporting organizations to validate and check for errors before submitting their final reports. The precertification process will also allow organizations to stage their data in batches and to avail themselves of the geocoding functionality for determining whether transactions are located in qualified Investment Areas (IAs) or may be categorized as serving a Low-Income Targeted Populations (LITP) by using the LITP Census Block geocoding function.

With batch precertification, organizations can first upload transactions that their loan processing systems and documentation can code for all 11 data points required for each transaction as specified in Table 1. Next, in the batch system, organizations may choose to complete transactional reporting by using the automated coding functions of the CTLR system, which only requires the user to enter data points 1 through 6. The system then generates data points 7 through 10 by using CIMS to geocode each transaction address and thereby determines which transactions are in qualified CDFI Investment Areas (data point 10). Data point 11 can be coded by selecting the LITP Census Block Group functionality in AMIS, which uses the latitude and longitude results (data points 8 and 9) from the initial geocoding process to conduct a more detailed geocoding process to identify which transactions may qualify as LITP.

When users upload their reports into the precertification process, the system will check for errors. Once all of the transactions are correct and validated by the system, an organization can submit the final report. However, the organization should retain all supporting documentation for compliance record keeping just in case it is subject to a random desk review.

### **II. LITP Output File for Coding by Census Block**

As noted above, an organization may select the Census Block coding method to determine which transactions can be designated as LITP via the Census Block proxy method. To do so the user must upload the CIMS geocoder LITP address output file of transactions generated by the AMIS system during the initial geocoding step. The Census Block geocoder will provide the 12digit Census Block code for each transaction and identify whether it qualifies. A transaction is coded either as Yes or No based on the transaction's location in a census block and the census block's percentile rank in terms of the number of low-income households within the census block.

In cases where an applicant or CDFI possesses loan documentation to indicate that the transaction is low-income based on the CDFI Fund Certification guidance, then these transactions should be coded according to the LITP status and validated separately in their organization's pre-certification account.

#### **III. CTLR for Financial Services (conditionally required)**

Regulated entities seeking to obtain or maintain CDFI Certification are able to document the provision of qualified Financial Services to meet the Target Market test if their qualified Financial Product transactions fall below the 60 percent threshold but still represent at least 50% of total transactions.

To provide for such cases, the CTLR will provide a separate template to geocode the location of individual and commercial checking and savings accounts or credit unions' member share accounts by the census tract FIPS code based on the most recent fiscal year activities. Validations depend on which accounts qualify based on qualified Investment Areas and LITP census block assessments.

To conduct a financial account analysis, please select the Financial Services template, which will tabulate and roll up the count of financial service accounts by census tract. Please note that CIMS will NOT save any addresses and will return a file with only valid FIPS codes and identify transactions that serve distressed areas or Targeted Populations. This approach protects confidential information.

#### **IV. CTLR for Loan Purchases**

CDFI Certification applicants or Certified CDFIs can document how their purchase of loans from certified CDFIs or non-CDFIs serve to meet the Financing Entity, and/or the Target Market test.

The CTLR will provide a separate template to geocode the location of loans purchased from a CDFI or non-CDFIs only if address information is available for each transaction. If loans are purchased from a CDFI, these transactional data points should be available and can be loaded into the template. Validations depend on which loans qualify based on qualified Investment Areas and LITPs and, if available, information on approved OTP status (see Table 1 above). If the loans are purchased from a non-CDFI, the transactions may be evaluated by using the CTLR to code loans for IA and LITP status via the LITP Census Block method.

To conduct a loan purchase analysis, please select the Loan Purchase template. Please note that CIMS will NOT save any addresses and will return a file with only valid FIPS codes for each transaction that is identified as serving either a distressed area or Targeted Population. This approach protects confidential information.

Once both the loan purchases and all other CTLR coding is completed and validated in the organization's pre-certification account and submitted, the system will report the percentage of all valid Target Market transactions as a share of all loan purchases and other Financial Products.

### **Appendix A: CTLR Report Requirement**

The CTLR Report will capture information on all loans and investments that the organization originated during the reporting period as determined by its Certification Application or, for Certified CDFIs, by its Fiscal Year End. This report is only required for new Certification Applicants and currently Certified CDFIs that are not current Financial Assistance (FA) award recipients and therefore do not have to file an award recipient TLR.

For Certified CDFIs without an FA award, your organization's ACR will enable the CTLR report. For those CDFI award recipients that will be submitting a TLR during the reporting year, your ACR will disable the CTLR reporting requirement for the reporting year.

If your organization does not agree with the award and reporting status displayed in the ACR, Please review your Assistance Agreement with the CDFI Fund to ascertain which reports are designated in that Agreement. If you believe that your organization status is incorrect, please submit a service request in AMIS requesting a review of your award and reporting status.

# Question: Will the Organization submit a Transaction Level Report for the current reporting period?

If "YES," the AMIS system will auto-populate this response based on the organization's award status as a current FA recipient. If the award recipient is a Depository Institution Holding Company that has any Signatories of Affiliates to the award, the Signatories (Affiliates) will provide the TLR. Please review your organization's Assistance Agreement if you have any questions. All current FA recipients will be able to skip this section.

If "NO," then go to your organization's AMIS account and click on the CTLR tab. Then download the CTLR template and follow the data entry instructions to complete the following data points.

### Explanation of the Data Points for CTLR Loans/Investments Originated Report

**Fiscal Year:** Auto-populated by AMIS in the CTLR template.

This identifies the CDFI's reporting period fiscal year during which all loans/investments reported in this CTLR were originated.

### **Originator Transaction ID**

Your organization should assign a unique identifier to each loan/equity investment. The identifier can be a combination of both letters and numbers and should start with a letter. It should not contain any special characters such as, but not limited to, commas and exclamation points. <u>Do not use names, social security</u> numbers or any other personally identifying information in creating the Originator Transaction ID.

Validations:

- Mandatory Field
- Each Originator Transaction ID must be *unique* to each loan or investment. Duplicate Originator Transaction IDs will cause errors in the file.

Response must be text - up to 20 characters

# Date Originated

Report the date that a legally binding note was signed by the borrower/investee in favor of the lender/investor (i.e. note is "Closed")

Validations:

- Mandatory Field
- For currently certified CDFIs the date Originated must be prior to the Organization's most recently completed Fiscal Year End Date.
- For new certification Applicants the dates originated must fall within the 12 full months completed just prior to submission of the Certification Application.

Response must be mm/dd/yyyy

# Original Loan/Equity Investment Amount

Report the amount of the loan/equity investment. The amount should be a non-zero positive whole number.

Validations:

- Mandatory Field
- Original Loan/Investment Amount cannot be zero

Response must be numeric

### **Transaction Purpose**

Choose one of the pre-defined values below and identify the primary purpose of the financial note. If there are multiple purposes (for example, a loan funding both the purchase of a fixed asset and a facility improvement), select the purpose that is the largest percentage of the transaction.

Validations:

• Mandatory Field

Please select one of the following loan types:

1)	CONSUMER	Consumer: Personal (secured or unsecured) loan or line of credit (including credit cards) to one or more individuals for health, education, auto, emergency, credit repair, debt consolidation, or other consumer purpose. Personal loans intended for business purposes should be identified as Business loans. Personal loans for home improvements or repairs should be included with Home Purchase and Improvement loans (see 3 below).
2)	BUSINESS & MICRO	Non-Real Estate Business: Financing to for-profit and nonprofit businesses including micro-loans. This is for a loan purpose that is not connected to real estate development (including construction of new facilities and rehabilitation/enhancement of existing facilities), management, or leasing of real estate.
3)	HOME PURCHASE or HOME IMPROVEMENT	Home Purchase – Loan: Purchase of a primary residence. Home Improvement – Loan: Renovation or other improvement of an owner- occupied home.
4)	COMMERCIAL REAL ESTATE	<ol> <li>Real Estate – Construction/Permanent/Acquisition without Rehab – Commercial: Financial Note is for predevelopment financing, construction or permanent financing, or acquisition without rehabilitation of office, retail, manufacturing, or community facility space. This includes mixed-use real estate that combines both commercial and residential use.</li> <li>Real Estate – Rehabilitation – Commercial: Financing is used to rehabilitate office, retail, manufacturing, or community facility space. Financial Note may include acquisition costs. This includes mixed-use real estate that combines both commercial and residential uses.</li> </ol>
5)	RESIDENTIAL REAL ESTATE	<ol> <li>Real Estate – Construction – Housing – Multi Family: Financial Notes are used for predevelopment financing, or construction of multi-family housing.</li> </ol>

	2. Real Estate – Construction – Housing – Single Family: Financial Note is used for predevelopment financing, or construction of single family housing.
	3. Real Estate – Rehabilitation – Housing – Multi-Family: Financing is used to rehabilitate or acquire multi-family housing.
	4. Real Estate – Rehabilitation – Housing – Single Family: Financing is used to rehabilitate or acquire single family housing.
6) OTHER	Other: Financial note purpose does not match any of the purposes defined above. Use the drop down options: if the loan is to another CDFI, please select from the drop down options "Loans to another CDFI." If it is not, please select "Other purpose" and complete the short description (25 character limit).

# Transaction Type

Choose one of the pre-defined values below and report the type of transaction for the financial note. For Loan Guarantees, the entity is a guarantor for this loan.

Validations:

• Mandatory field

#### Please select one of the following:

Please select one of the following:	
TERM	Term Loan
EQTYINV	Equity Investment
LOC	Line of Credit (including credit cards)
DEBTEQTY	Debt with Equity Features
LNGUARANTEE	Loan Guarantee
OTHER	Other (if pre-approved by the CDFI Fund)

### Low-Income Status:

Report whether the transaction serves a Low-Income Targeted Population (LITP) as defined in the CDFI Certification Application guidance or the CDFI's certification determination letter.

For determining LITP status through your organization's loan processing system and documentation, please consult the CDFI Fund's Target Market verification guidance. Accordingly, please choose one of the pre-defined values below and report the income status of the borrower/investee. If there is more than one borrower/investee, respond for the primary borrower/investee. If there is more than one primary borrower/investee, select the income status of the highest income primary borrower/investee. If the primary borrower/investee is a business, then the response should be based on the status of the individual who maintains the largest ownership share of a business. Area Median Family Income (AMFI) for a borrower/investee depends on the metropolitan/nonmetropolitan designation of the county where the investee/borrower resides. If the borrower/investee lives in a metropolitan county, then use the greater of either the statewide or national non-metropolitan AMFI. Enter "Do Not Know" if the information is not applicable.

Validations:

Please select o	ne of the	following:
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Enterna de Las de la como	Select this option if investee/borrower's family income is less than 30
Extremely Low-Income	percent of the Area Median Family Income.
	percent of the vice median runny medine.
	Select this option if investee/borrower's family income is equal or greater
Very Low-Income	than 30% and less than 50% of the Area Median Family Income.
	Select this option if investee/borrower's family income is equal or greater
Low-Income	than 50% and equal or less than 80% of the Area Median Family Income.
	Select this option if investee/borrower's family income is greater than 80%
Middle-Income	and less than 120% of the Area Median Family Income.
	Select this option if investee/borrower's family income is equal or greater
Upper-Income	than 120% of the Area Median Family Income.
	Do Not Know
Do Not Know	

# Other Targeted Populations (OTP)

Using the CDFI Fund's approved verification process for identifying transactions as serving an approved OTP, please select from the drop down the type of OTP that applies to this transaction.

Validations:

• Mandatory field

Please select one of the following:

African American/Black
American Indian
Native Alaskan
Native Hawaiian
Native Pacific Islander
Hispanic Origin
People with Disability
Other Approved OTP
NA

# Description of Other Approved OTP

If "Other Approved OTP" was selected above, report the description of that targeted population.

Validations:

- Conditionally required if the user answered, "Other Approved OTP".
- Applicant or Certified CDFI must have had Other OTP approved by the CDFI Fund's Certification unit.

Response must be text

### End Users:

**Loans to businesses:** End users are third party entities. For example, CDFI X (first party) makes a loan to Business Y (second party), then Business Y (second party) hires Entity Z (third party). If Entity Z (the third party) is low-income as defined in the Low-Income Status section, then select "YES" for LITP End Users. If Entity Z (the third party) is an "other target populations", then select the appropriate OTP End Users. If Entity Z (the third party) lives in an Investment Area as defined by the CDFI Fund, then select "YES" for IA End Users.

**Loans for Facilities and Multi-family Housing:** Reporting End Users for OTP, LITP or IA designated loans to fund facilities or multi-family housing or apartments should reflect the majority of the demographic or socioeconomic characteristics of the Targeted Population.

# LITP End Users

Report whether the transaction serves Low-Income Targeted Population (LITP) End Users as defined in the CDFI Certification Application guidance or the CDFI's certification determination letter. "Low-Income" is defined as having family income equal to or less than 80% of the Area Median Family Income.

Validations:

Mandatory field

Please select one of the following:

YES	Yes
NO	Νο
NA	Not Applicable

### OTP End Users

Report whether the transaction serves Other Targeted Population (OTP) End Users as defined in the CDFI Certification Application guidance or the CDFI's certification determination letter.

Validations:

#### Mandatory field

Please select one of the following:

African American/Black

**American Indian** 

Native Alaskan

#### **Native Hawaiian**

Native Pacific Islander
Hispanic Origin
People with Disability
Other Approved OTP
NA

# Description of Other Approved OTP-End Users

If "Other Approved OTP" was selected above, report the description of that targeted population.

Validations:

#### • Conditionally required if the user answered, "Other Approved OTP".

Response must be text

# IA End Users

Report whether the transaction serves Investment Area (IA) End Users. Consult the "CDFI Program 2011-2015 ACS Eligible Investment Areas" table for identifying eligible IA census tracts --

https://www.cdfifund.gov/research-data/Pages/default.aspx.

Validations:

• Mandatory field

#### Please select one of the following:

YES	Yes
NO	No
NA	Not Applicable

# **Geocoding CTLR Addresses**

#### **Overview:**

As noted above, in AMIS, your organization may use either the online AMIS interface for entering single address records for each transaction or a bulk upload capability for coding multiple address records for transactions. The bulk uploads are done by downloading a CTLR address template from within your AMIS account. Either method will provide a means to geocode transaction addresses. The geocoding process is done through CIMS, which will generate a FIPS code and x/y coordinates for each transaction. This information provides the geographical information necessary to identify transactions that may qualify as qualified Investment Areas or LITP transactions based on the proxy method. In some instances only a P.O. Box address may be connected to a transaction; however a P.O. Box address is not sufficiently precise enough to geocode a transaction because a P.O. Box Zip Code often crosses census tract boundaries. For this reason the CDFI Fund requests that a transaction's latitude and longitude be derived from a GPS locator, otherwise such cases cannot be evaluated for Target Market deployment.

If an organization is using its own loan processing and geocoding system please follow the detailed requirements specified below. The appropriate output should provide an 11-digit FIPS for census tract coding and the x/y coordinates.

Regarding categorizing a transaction as LITP, organizations should follow the documentation specified by CDFI Fund's Certification policies and procedures. However, if an organization wishes to determine LITP status using the CDFI Fund's Census Block LITP coding procedures, please load the CIMS output file generated by the initial geocoding process into the Census Block geocoder. Please note that in order to protect confidential information, once all the steps of the coding procedure are completed, the system will NOT save any addresses.

### Manual Entry through the AMIS Interface:

To add a CTLR Address, simply locate the "CTLR Address" entry on the related list on the CTLR tab and click "New CTLR Address." If another address needs to be recorded, repeat this step.

If multiple addresses are required for many transactions please use the bulk upload procedure and the CTLR Address template.

#### **BULK Upload Procedures:**

The following data points can also be reported through the XML or CSV bulk upload capability:

# Project Street Address Line

Report the location for which the loan or investment is being used.

Validations:

• Conditionally required if geocoding in CIMS system and valid GPS confirmed x/y coordinates cannot be supplied.

Response must be text

# Project Street Address Line 2

Report the second line of the project's street address, if necessary.

Validations:

• Optional field

Response must be text

# Project City Report the project's city. Validations: • Conditionally required if geocoding in CIMS system and valid GPS confirmed x/y coordinates cannot be supplied.

Response must be text

# **Project State**

Report the two-letter state abbreviation.

Validations:

• Conditionally required if geocoding in CIMS system and valid GPS confirmed x/y coordinates cannot be supplied.

Response must be text

# Project Zip Code 5

Report the five-digit zip code.

Validations:

• Conditionally required if geocoding in CIMS system and valid GPS confirmed x/y coordinates cannot be supplied.

Response must be text

# Project Zip Code +4

Report the four-digit zip code extension

Validations:

• Optional field

Response must be text

# Project X-Coordinate

Report the project's X-Coordinate. It should be a negative number such as -77.04201.

Validations:

- Conditionally required if no address is available
- X-Coordinate must be between -60 and -180 and reported to five (5) decimal points.

Response must be numeric

### **Project Y-Coordinate**

Report the project's Y-Coordinate. It should be a positive number such as 38.90397.

Validations:

- Conditionally required if no address is available
- Y-Coordinate must be between 17 and 72 and reported to five (5) decimal points.

Response must be numeric