



Digital Token Identifier Foundation

✉ [secretariat@dtif.org](mailto:secretariat@dtif.org)

5 December 2024

**To: Regulatory Oversight Committee**

**Re: Harmonisation of Critical OTC Derivatives Data Elements (Other than UTI and UPI) -  
Revised CDE Technical Guidance (Version 4) Consultative Document**

Submitted by email: [rocsecretariat@ofr.treasury.org](mailto:rocsecretariat@ofr.treasury.org)

The [Digital Token Identifier \(DTI\) Foundation](#)<sup>1</sup> welcomes the opportunity to respond to the Regulatory Oversight Committee (ROC) [public consultation](#) on *Harmonisation of Critical OTC Derivatives Data Elements (Other than UTI and UPI) - Revised CDE Technical Guidance (Version 4)*. We support the use of internationally recognised ISO standards to capture data elements in a consistent manner. In this regard, we welcome the ROC's proposed revision to set the ISO 24165 DTI standard for the Underlier ID (Other) for digital assets.

We have confined our response to questions 32 and 33 on allowable values for data elements relating to Underlier ID as this is directly relevant to the DTI Foundation's remit.

We are available to answer any questions you may have and would welcome the opportunity to discuss the ISO 24165 DTI standard further with the ROC. Please do not hesitate to contact us at [secretariat@dtif.org](mailto:secretariat@dtif.org).

---

<sup>1</sup> The DTI Foundation is a non-profit division of Etrading Software Limited: <https://etradingsoftware.com/>

**Question 32: This data element is updated to further specify the allowable values. This is not an exhaustive list and other reference underliers may be used. Do you have any comments or concerns on the proposed amendment?**

The DTI has recently been introduced to the Unique Product Identifier (UPI – ISO 4914) to unambiguously identify crypto-asset underliers for OTC derivatives. Supervisors and market participants can leverage UPI reference data to understand the underliers of crypto-derivatives, with DTI codes identifying the most liquid crypto assets.

We welcome the addition of a DTI code as an allowable value for Underlier ID (Other) for when a DTI is not available as part of the current UPI enumeration list to capture a digital asset underlier. In this scenario, the data structure and usability of the values provided in 'Underlier ID (OTHER)' will offer reporting entities a consistent structure and mechanism to populate the field. This approach will provide supervisors with enhanced reference data, compared to a generic alphanumeric allowable value field.

**Question 33: This data element is updated to further specify the allowable values. Do you have any comments or concerns on the proposed amendment?**

The DTI Foundation understands the relevance of capturing a source data element associated with the underlier ID (Other) field. In the case where an ISO 24165 Digital Token Identifier is populated for Underlier ID (Other), we propose the source should refer to 'Digital Token Identifier' or 'DTI' instead of 'ISO 24165'. We understand this aligns with the source field conventions, and the 9-character DTI code will immediately be associated with "DTI" instead of the name of its ISO documentation.

## About the DTI Foundation

The DTI Foundation is the Registration Authority for the International Organization for Standardization (ISO) 24165 Digital Token Identifier (DTI) standard<sup>2</sup>, an ISO standard that enables the unique identification of all fungible digital assets which use DLT for token issuance, storage, exchange, record of ownership, or transaction validation. The DTI itself comprises a code - a random, unique combination of nine alphanumeric characters allocated to a cryptoasset - and a record of reference data, which is held by the DTI Foundation. The reference data provides information about the DLT on which the token is deployed, as well as token technical attributes (such as address, name(s), and any external identifiers).

The DTI Foundation's mission is to provide the golden source reference data for the unique identification of cryptoassets. The DTI Foundation issues and maintains DTIs on a non-profit basis, to increase transparency in the digital asset space by creating a core reference data set based on open data principles and made available as a public good.

As the Registration Authority for the DTI ISO standard, the DTI Foundation follows strict ISO governance requirements of fair, reasonable, and non-discriminatory (FRAND) principles. The DTI is open and may be freely reproduced, distributed, transmitted, or otherwise used by anyone for any purpose, commercial or non-commercial at no cost.

The DTI Product Advisory Committee (PAC) as the core governance committee provides stewardship and oversight to the implementation of the ISO 24165 standard. The DTI PAC currently comprises over 25 members representing a cross-section of crypto and digital asset market stakeholders, including global institutional investors, standard-setting bodies, academics, asset managers and market infrastructure providers from various regions globally. The list of DTI PAC members is available on the DTI Foundation webpage<sup>3</sup>.

---

<sup>2</sup> [ISO 24165-1:2021](#) and [ISO 24165-2:2021](#), Digital token identifier (DTI)

<sup>3</sup> <https://dtif.org/product-advisory-committee/>