A Common Data Format for Pre-LOUs to Use for
Sharing or Publication of Data, part 1

The attached table sets out the basic elements of a common data format to be used by pre-LOUs as a standard for data publication in the interim Global LEI System (GLEIS). A second part will set out the more detailed technical specification. After consultation with pre-LOUs and other relevant stakeholders to finalise the technical specifications of the common data file, the ROC will publish the technical specifications and set out a deadline for endorsed pre-LOUs to introduce and publish the data file[1]. The deadline will be set in recognition of market and technology needs. It will also apply to prospective pre-LOUs seeking endorsement to join the interim system - pre-LOUs will be expected to commit to publishing the common data file by the deadline.

The work on the common data file has been undertaken to address a strong demand from market participants and a number of pre-LOUs. The absence of a common data format across pre-LOUs adds complexity to the task of avoiding exclusivity violations (more than one pre - LEI per entity) and difficulties for users uploading data from multiple pre-LOUs into their systems.

The work was divided into two parts to support the demand for rapid progress. This initial work, outlined in the attached table, provides the basic elements of the common data format. It separates (1) information required by ISO 17442:2012 and closely linked information, (2) additional status information important for interpretation of the data and (3) other information judged necessary for addressing differences across pre-LOUs or needs of their jurisdictions in the interim GLEIS.

The initial work will be followed by more precise specification of the content, range and high-level technical design of pre-LEI data records at the launch of the system, consistent with recommendation 9 of the G20 endorsed FSB recommendations for the Global LEI System[2], as specified in ISO 17442:2012. It does not change the ISO 17442:2012 LEI identification standard but provides clarity and specificity, and builds on previous guidance provided to pre-LOUs[3]. As well as clarifying the requirements for the initial reference data, the technical specifications are expected to include requirements for additional status information which is important for the interpretation of the data, as well as other information judged necessary for addressing differences across pre-LOUs and the needs of their jurisdictions in the interim GLEIS.

The work is designed to provide a framework to support the initial roll out of the Global LEI System. The ROC wishes to emphasise that the GLEIS will evolve over time in response to the needs of the regulatory community and private sector users, for example to incorporate

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[1] Pre-LOUs may choose individually to publish information in other formats in addition to the common data file.
[2] http://www.leiroc.org/publications/gls/roc_20120608.pdf
[3] http://www.leiroc.org/publications/gls/lou_20130727.pdf

additional reference data, such as on ownership and hierarchical relationships as previously highlighted or to address any special cases of national and international identification. In addition, the ROC and the GLEIF may provide further guidance on standards and the application of standards in response to observed needs. Pre-LOUs and LOUs[4] will be expected to adopt such new standards as the system evolves, subject to due allowance for the time for implementation and appropriate transition planning.

The common data format for the initial system has been prepared by the LEI ROC Committee on the Evaluation and Standards (CES) in close collaboration with the Private Sector Preparatory Group (PSPG), nominees to the Board of Directors of the Global LEI Foundation (GLEIF), pre-LOUs, and other stakeholders. The ROC has endorsed the common format and is very grateful for the full and active collaboration of all the participants in the work. ROC Members look forward to the finalisation of the technical specification of the data elements and to the implementation of the common data file.

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[4] http://www.leiroc.org/publications/gls/lou_20130727.pdf

Table: Information content of the common file

#	Element name	Content
Information required by ISO 17442 and closely related information		
1	legalEntityIdentifier	LEI
2	legalName	This variable contains (one of) the legal name(s) of the entity in local language and character set. The legal name of a fund is the name as set out in the constituting documents of the fund. This can include an alphabetic name, a numeric code or a combination of both. With regard to sub-funds, the following format for presenting the name is to be used:[Name of Umbrella Fund] – [Name of Sub Fund] – [Name of Pooled Fund]. When an entity is not well distinguished by its legal name in the absence of the name of a managing entity distinct from the legal entity, as is the case for some types of fund, a specific additional field may be used to record the name of the manager; the code in item 19 ("entityNameFormatEnum") indicates when the second field is included.
3	otherEntityNames (Optional)	This field includes additional legal names, transliterated names (preferred/automated) in Roman characters
4	legalAddress	The legal address is the physical address to which legal actions would need to be addressed; this address will most often be given in official registries or foundational documents for an entity. The treatment of the legal address for funds should use the following "waterfall" approach: (1) where the fund's constituting document identifies a registered address, that address should be used; (2) failing (1), if the foundational documents identify an address for the service of legal documents, that address should be used; (3) failing (1) and (2), if there is a management company responsible for the legal affairs of the entity, the address of the management company should be used.
4	headquartersAddress	In some circumstances, the physical headquarters address may be precisely defined as a legal term, but in other situations there is no such formally defined alternative. Where no such formal address exists, focusing on communication as an objective would support allowing

the registrant to define for itself an address at which it might be contacted most usefully. Following this approach, it is recommended that where there is no legally defined headquarters address, the physical address where the entity prefers to receive routine communication should be recorded.

The treatment of headquarters address for funds should use the following "waterfall" approach: (1) where the fund's constituting document identifies an address as its headquarters, that address should be used; (2) failing (1), the address of the management company as provided in the constituting documents should be used; (3) failing (1) and (2), the address of legal formation should be repeated.

5	otherAddresses (Optional)	This field contains, where relevant, romanized versions of legal and headquarters addresses, or other addresses.
6	businessRegisterName	This field contains the name of the business register (or other source) as reported in the list of sources maintained by the ROC Secretariat as having no IP restrictions on redistribution.
7	businessRegisterEntityID (Relevant when item 6 is non-null)	This field contains the code used to refer to the entity in the source referred to in item 6.
8	entityExpirationReason (Relevant where item 13 takes value c.)	This variable takes the values DISSOLUTION (out of business) or CORPORATE_ACTION (merged/acquired by the survivor under this type of corporate action). Other codes may be developed for this variable during the technical specification phase.
9	entityExpirationDate (Relevant where item 13 takes value c.)	The machine time/date when the information was recorded that an entity ceased to exist or to exist independently.
10	successorLEI (Relevant where item 13 takes values reflecting state c or item 14 takes is value b.)	The LEI of the survivor under a corporate action to acquire/merge the entity or the LEI of the surviving entity under an exclusivity violation.
11	leiInitialRegistrationDate	This field should record the machine date and time that the LEI was originally published.

12	leiRegistrationLastUpdateDate	This field records the most recent date and time that any change has been made to any of the ISO 17442 reference data fields.

Other operational variables

13	entityStatus	This variable is used to refer to the current status of an entity. The classes of states are: (a) ACTIVE (in business as of the most recently received information), (b) NOT SPECIFIED (the entity has either failed to perform its regular re-certification or that the record is the non-survivor under an exclusivity violation) and (c) INACTIVE (the entity is either out of business or merged/acquired by a dominant survivor).
14	leiRegistrationStatus	This field is used to refer to the current status of an LEI record. This classes of states are (a) ISSUED (value for a record that is within its recertification period and the entity is in business), (b) DUPLICATE (the non-surviving record under an exclusivity violation), (c) LAPSED (the record has not been recertified since the passing of its most recent recertification period), (d) RETIRED (the entity has gone out of business), or (e) MERGED (the entity has been merged with another entity and it is not the survivor).
16	leiNextRenewalDate	This is the date at which the most recent (re-)certification of an entity expires
17	responsibleLOU	This field contains the LEI of the pre-LOU that is responsible for managing the LEI record.
18	leiValidationSources	This field summarizes the sources of validation information at a high level. The values taken are PUBLIC SOURCES, need final codes here. Where a registry used to validate the record was not one in the list maintained by the ROC Secretariat (see item 6), the information in this field can signal the type of information used to users of the GLEIS through the use of the code PUBLIC SOURCES.

Interim information relevant to accommodate local variations

19	entityNameFormatEnum	This field is defined as a switch that takes one of two values indicating whether item 2 is specified as one or

	(Default value is ONE NAME)	two lines, where the additional line is needed to specify the name of a higher-level entity in order to have a sufficiently clear or distinct meaning for the legal name. This field is a <u>transitory expedient</u>. The situation driving this distinction is the inclusion of certain types of funds that are not well distinguished without the presence of the name of the fund manager.
20	legalForm, legal_Jurisdiction (Optional)	The variable legalForm usesa free-text field to contain the legal form of organization of the entity. It is <u>explicitly transitory and optional</u>. The accumulated information will serve as the basis for future standardization work. The legal jurisdiction for legal formation is included as an auxiliary variable for this field.
21	extensionData (Optional)	This is a catch-all for any other information specific to a pre-LOU that the pre-LOU wishes to include in the published data.