

## URGENT NOTICE

**Date:** August 5, 2013  
**To:** CICI Utility Users  
**From:** The CICI Utility Team  
**Subject:** CICI Utility Enhancements

Effective August 30<sup>th</sup>, the CICI Utility downloadable database files and web portal will be enhanced to comply with recent Regulatory Oversight Committee (ROC) guidance dated July 27, 2013, as well as guidance from the Commodity Futures Trading Commission (CFTC). Accordingly, the users of the CICI Utility files will be required to adapt and integrate these changes.

### **Background**

The July 27, 2013 ROC Guidance -- [Principles to be observed by Pre-LOUs that wish to integrate into the Interim Global Legal Entity Identifier System \(GLEIS\)](#) -- provides a framework for global acceptance of legal entity identifiers, including the CICI. This framework outlines the requirements for organizations to be accepted as a Pre-Local Operating Unit (LOU) in the interim global LEI system as issuers of legal entity identifiers. It is important for the CICI to be part of the global LEI system and be eligible for reporting to any regulator which requires pre-LEIs on mandatory trade reporting.

**(Note:** The pre-LEIs and pre-LOUs within the interim global legal entity identifier system will transition into LEIs and LOUs once the ROC requirements are met and the global legal entity identifier system is fully operational.)

### **CICI Utility Enhancement Drivers**

Three specific ROC recommendations are driving the changes to the CICI Utility:

1. Only “certified” or previously reported pre-LEIs are accepted in the interim global LEI system. Certified records are those that were registered by the entity themselves or by a third-party with explicit permission to register on the entity’s behalf.
2. Pre-LEI numbers may only be issued to new registrants after the validation process is complete.
3. Five additional ISO 17442 fields must appear on the pre-LEI record. These include Headquarters Address, Business Registry Name, Business Registry Number, Date of Expiry, and Reason for Expiry.

### **CICI Utility Enhancement Summary**

- Uncertified CICIs that have never been used in regulatory reporting (approximately 18,000) will be permanently removed from the CICI database. Entities associated with these uncertified CICIs will need to re-register for a new identifier for future regulatory reporting.
- The remaining 69,000 CICI records will be placed on a new “CICI Issued” file.
- The current CICI Utility “Full” and “Delta” files will be replaced with the new “Full” and “Delta” CICI Issued files.

- For new registrations, the CICIs will be issued only after the reference data is validated by the CICI Utility. During the process of validation, users can view the pending registrations in the new “CICI Staging” file. Once the CICI is issued, the record will be moved to the “CICI Issued” file.
- Five additional fields have been added to the CICI record to comply with ISO Standard 17442. These are Headquarters Address, Business Registry Name, Business Registry Number, Date of Expiry, and Reason for Expiry.
- Some of the vocabulary used on the CICI Utility Portal to describe various “Record States” and “Certification States” will be modified to add further clarity.
- The CICI file structure has been enhanced to support the record transfer process between LOUs. This will result in a new field, new enumerated values, and a new event.

### **CICI Utility Enhancement Details**

The CICI Utility Team has consulted with the CFTC, the regulator sponsor of the CICI Utility, on the changes necessary to assure global acceptance of CICIs given the ROC guidance. Upon agreement with the CFTC, **the following enhancements will be made to the CICI Utility on August 30<sup>th</sup>**, with additional enhancements on September 15<sup>th</sup> as noted below:

1. **Uncertified records not used in regulatory reporting will be removed.** Uncertified records include those registered as part of the preloading of the CICI Utility dataset, as well as those that were registered by a third-party without the explicit permission of the entity being registered, and which have not subsequently been certified. These records will be removed from the CICI Utility dataset and will not be visible via the CICI Utility Portal search function or the daily files.
2. **The current CICI Utility “Full” and “Delta” files will be replaced with two new CICI Utility files, the “CICI Issued Full” file and the “CICI Issued Delta” file.** The CICI Issued Full file includes all Certified CICI records as well as records that have been used in reporting but remain uncertified until now. All of these records are expected to become globally acceptable and transition to LEIs. These new files will be produced daily (the new XSD file schema is available at <http://www.dtcc.com/products/dataservices/lei.php>) and will replace the files currently being published. **All users who have automated the consumption of the current data files will need to make changes to accept the new files.** Note that there will be slight modifications to the file structure and the records included in this file between the August 30<sup>th</sup> and September 15<sup>th</sup> releases. The XSD listed above is for the August 30<sup>th</sup> release. Another schema file for the September 15<sup>th</sup> release will be made available as soon as possible.
3. **Two new “CICI Staging” files will be created.** These files are available for those wishing to view records that are in the process of being validated by the CICI Utility Validation Team and have not yet been assigned CICIs (records in the process of being validated will be searchable on the CICI Utility portal). These files will be implemented in two stages. The August 30<sup>th</sup> file (the August 30<sup>th</sup> schema is at <http://www.dtcc.com/products/dataservices/lei.php>) will include all records in the CICI Utility (except for uncertified, never reported CICIs as mentioned above). On September 15<sup>th</sup>, these files will include only records that are still under initial review by the CICI Utility Validation Team and have not yet been assigned CICIs. There will be slight modifications to the file structure and the records included in this file between the August 30<sup>th</sup> and September 15<sup>th</sup> releases. Another schema file for the September 15<sup>th</sup> release will be made available as soon as possible.
4. **The five additional ISO fields will be available on the CICI Utility Portal and on the four new data files.** On August 30<sup>th</sup>, new fields will be introduced on the CICI Utility Portal. These fields will be disabled from input until subsequent releases. On September 15<sup>th</sup>, the “Headquarters Address” will be mandatory for input on new registrations. The “Business Registry Name” and “Business Registry Number” fields will be available for population by registrants once further definition is finalized by the ROC. The “Date of

Expiry” and “Reason for Expiry” fields will be populated by the CICI Utility Validation Team in cases where an entity ceases to exist. Information on possible legal entity expirations can be provided via the existing Challenge process.

5. **Some of the vocabulary used on the CICI Utility Portal to describe various “Record States” and “Certification States” will be modified to add further clarity.** The changes are as follows:

Old Value	New Value
Certification State	Maintenance State
Certification State: Certified	Maintenance State: Current
Certification State: Not Certified	Maintenance State: Not Current
Certification State: Stale	Maintenance State: Not Current
Next Certification Date	Next Maintenance Date
Record State: Validated	Record State: Public Sources
Record State: Inadequate Sources	Record State: Registrant Source
Record State: Conflicting Sources	Record State: Multiple Sources
Event: Certified	Event: Last Maintained

The CICI Utility currently produces a consolidated file of records made available by the CICI Utility and other LOUs. This file structure must change to support the changes in vocabulary and the addition of the ISO fields made in this release. The schema for the August 30<sup>th</sup> file can be found at <http://www.dtcc.com/products/dataservices/lei.php>. Another schema file for the September 15<sup>th</sup> release will be made available as soon as possible.

6. **The CICI Issued files will contain a new field and new values related to cases where an existing pre-LEI code is transferred from one pre-LOU to another pre-LOU for ongoing maintenance. This will be part of the September 15<sup>th</sup> release.** A new “Transferred To” field will be added to identify which pre-LOU the record was transferred to. New Record State values will be added to indicate that a record is no longer being maintained by the CICI Utility and is being maintained by another pre-LOU. All changes related to the transfer process will be introduced in the September 15<sup>th</sup> release.

We appreciate that the implementation of these changes is occurring with a compressed time frame; however, the timeframe is driven by regulatory decisions. The CICI Utility and CFTC believe it is most important that those obtaining CICIs are assured, as early as possible, that the CICIs can be used for reporting to all global regulators requiring pre-LEIs/LEIs on transaction reporting to trade repositories, as well as other vehicles developed to accept reporting of transactions in any asset class.

Questions regarding any of these changes should be referred to [customerservice@ciciutility.org](mailto:customerservice@ciciutility.org).

Please visit DTCC’s Legal Entity Identifier [web page](#) or SWIFT’s Legal Entity Identifier [web page](#) for further updates. Additional information and guidance will be provided as it becomes available.

Thank you for your continued support.

– The CICI Utility Team