

**Trade Association Group
Global Legal Identifier Solution
Commentary to Address Questions on LEI Implementation Timing**

- 1) The LEI solution is being developed by a broad group of firms and Trade Associations from around the globe (The Trade Associations). The Trade Association group, through its governance structure, has engaged global and regional market participants; as well the regulatory community to ensure views, practices and concerns are known and considered. It is a *global* solution.
- 2) The Legal Entity Identifier (LEI) Solution, once implemented, will be a valuable tool for the identification of legal entities that will be *available* for use by regulators and firms *around the globe*.
- 3) The key point is that the LEI is *available* for use – the Trade Associations have no power to require usage of the LEI or to dictate implementation timeframes. Only regulators can mandate the use and implementation of the LEI. Each regulatory body in each region of the world is responsible for deciding *if and when* the LEI is adopted in regulatory reporting of financial contracts.
- 4) The Trade Association Group strongly recommends the use of the LEI to all global regulators given the significant benefits this type of a global identifier will bring to firms and regulators.
- 5) The Trade Association group is moving fast to make a final recommendation as to the LEI standard and the LEI solution provider(s). This is to ensure that a solution is available for use as regulators adopt new rulemaking around the globe. Internationally, regulators are moving at different paces, and a key goal of the Trade Association group is to ensure there is a solution available for the countries and regions that are earliest in issuing new rulemaking.
- 6) Once the core solution and solution providers are in place, the Trade Association group fully expects that changes, improvements, additional aspects can be implemented as this gets rolled out around the world. With the core framework in place, there is the opportunity to flex the solution overtime, under the right governance to continue to improve it. Nothing is so set in stone that it can't continue to be adapted and improved. However, it is key to get the core standard and solution up and running and then work from there.