

# Inside Reference Data

September 2011

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## Regulation & Standards

Special Report



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## Editor's Letter



# A Standard Debate

The debate over implementation of the legal entity identifier (LEI) standard as set by the US Treasury's Office of Financial Research (OFR) heated up this past summer. After putting the LEI in place in July, in August the OFR announced the first phase of its implementation could begin in 2012, because enough progress had been made.

How the implementation of the LEI will be accomplished dominated the virtual roundtable discussion on pages 8–20. The global regulatory community will have to modify the LEI standard to make it universally acceptable, stated one of the executives in the roundtable. This could be as challenging as herding cats, as another executive described it.

Nonetheless, other participants in the roundtable believe the LEI shows promise of being accepted as a global and universal standard. In addition, close collaboration between the Association of National Numbering Agencies and market practitioners working with LEI utilities gives the standard a greater chance of timely execution and adoption, said an executive of a vendor in the industry.

To achieve that goal, however, the industry must get through a multi-year process of mapping each of the existing entity IDs to the LEI standard, as described in the roundtable. A prevalent “wait-and-see” attitude, as reported elsewhere in this month's issue of *Inside Reference Data*, is likely to be the biggest obstacle to getting started on that mapping. The roundtable, and this special report as a whole, examines the challenges the LEI presents as a standard, who supports it, and how they go about pushing for its implementation.

Yours sincerely,

A handwritten signature in black ink that reads "Michael Shashoua". The script is fluid and cursive.

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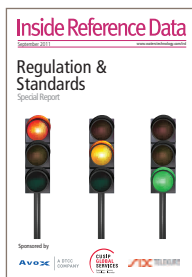
*Inside Reference Data* speaks to Bill Nichols, associate director of information standards, Office of Financial Research (OFR), about being at the center of the standards-setting process

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# Large Trade Reporting Rules Promote Centralized Data Models

CHICAGO—Reporting requirements for large traders issued by the US Securities and Exchange Commission (SEC) on July 26 will require firms whose trading is above certain daily or monthly share or value thresholds to strengthen their data governance capabilities, and move away from decentralized reference data management operations models, according to Chicago-based Matthew Schlatter, securities practice information strategy leader at Deloitte Consulting.

“This [regulatory request] places additional stress on whether you have strong data governance capabilities

that are actually well-structured, well-communicated and enforced,” he says.

“If you have a reasonably well-centralized reference data management operations layer, the reporting becomes fairly easy to include. If you have a widely distributed or decentralized model, you have to touch many more systems and operational groups. From a controls perspective, it will be more difficult to determine if you actually covered all your bases.”

The full version of this story appeared in *Inside Reference Data*, August 2011.

Michael Shashoua

## Firms Struggle to Meet Regulatory Risk Data Challenges

LONDON—Speakers at think-tank JWG’s recent seminar agreed their firms have to be more proactive to overcome the risk data challenge internally.

Despite efforts to tackle the risk data challenge, firms are a long way from ideal scenarios for compliance with upcoming regulatory reforms worldwide, according to speakers at a seminar held in London in July by regulatory think tank JWG.

Panelists agreed that even if the focus on risk data, fuelled by a regu-

latory push and increasing interest, has increased, firms are far from being able to overcome their internal risk data challenges.

The bar has been set extremely high. “The cost of failure is stoppage of trading and massive fines, so I think we clearly see the risk-reward potential of not being in the game correctly,” said one of the speakers at the event.

The full version of this story appeared in *Inside Reference Data*, August 2011.

Carla Mangado

## ISO 17442 Wins Industry Support as LEI Standard

**GLOBAL**—The Global Financial Markets Association (GFMA), a federation of global financial services trade associations, recommended the ISO 17442 standard for the legal entity identifier (LEI) last month.

A draft of ISO 17442 is expected to be published as an ISO International Standard by January 2012. The standard is being developed by the ISO Technical Committee for Financial Services (known as TC 68) and is currently in the Draft International Standard stage.

GFMA asserts that ISO 17442 is a basis for a viable, uniform and global LEI. Some of the key attributes of the standard include being able to define open governance of the issuance and maintenance of the LEI scheme that is scalable, global and free from assignment limitations.

Brett Lancaster, managing director, securities sales and initiatives, Americas, at Swift, says the new ISO 17442 standard was developed in “record time.” Swift and the Depository Trust & Clearing Corporation (DTCC)/Avox are working with ISO, the International Organization for Standardization, on implementation of the LEI.

The full version of this story appeared in *Inside Reference Data*, August 2011.

Carla Mangado  
and Michael Shashoua

## CDMG Raising LEI Awareness to Avoid Reg Disconnect

The Customer Data Management Group (CDMG), led by London-based regulatory think-tank JWG, is looking to raise greater awareness among industry groups and supervisors around the need to create a more homogeneous vision of the business requirements of the legal entity identifier (LEI) and other G-20 identifiers, *Inside Reference Data* has learned.

The group, which is currently tracking the different regulatory requirements that impact the legal entity data space, aims to create a holistic view of what will be expected from firms once the LEI is in place.

## ISITC US to Lay Out ISO 20022 Industry Benefits

The International Securities Association for Institutional Trade Communication (ISITC) corporate actions working group is producing a business case to portray the benefits behind the move to ISO 20022 for corporate actions.

The aim is to provide firms with evidence to put forward to top management when pushing for greater standardization internally and the usage of ISO 20022.

# Regulation & Standards: Community Matters

*Inside Reference Data* gathers leading industry professionals to discuss the latest news on how regulation and standards are affecting the reference data market

**To what extent are regulators setting the agenda in the data management space?**

**Mark Bands, head of global customer reference data, ANZ Institutional Bank:** The trends we have seen in the US and in Europe in the past 18 to 24 months have not yet made themselves apparent in the Asia-Pacific arena. In the US, regulators have taken a leading role, with the Federal Reserve even raising the issue of data standardization in the Senate, while in Europe regulators have moved forward with a more collaborative approach, articulating a broad readiness to engage with the data management community. In Asia-Pacific the communities are less homogenous and are, to an extent, still being led by movements in the more integrated markets.

**Ken Price, CEO, Avox:** In the legal entity space, to a great extent. While the industry has been making slow progress toward cleaning and maintaining their business entity databases, it was not until the Office of Financial Research (OFR) issued its requirements for regulatory reporting based on a universal legal entity identification code that focus intensified. The key now is for the global regulatory community to collaborate and make whatever modifications necessary to the LEI standard so it is universally acceptable. Evidence suggests this is happening now.

**Matthew Cox, global head of projects and strategy, data management, BNY Mellon Asset Servicing:** Regulators set a direction, but in my experience it is up to

each organization to ensure their control environment adequately covers the risk. It is rare for regulation to be detailed enough for data managers to have a 'to do' list they can just tick off. This is why it is important to ensure organizations possess the right level of experience to understand requirements. I do think the industry is in a wait-and-see mode right now. However, once a new regulation is finalized, it would be ideal if all the large organizations were to take a consistent approach in interpreting and meeting that requirement.

**Matthew Bastian, director of market and business development, Cusip Global Services:** Certainly in the US market, the advent of the OFR has put the regulators in the driver's seat. Both the OFR, with the LEI initiative, and the CFTC, which has a similar concept in its UCI, are setting a new foundation for standardized reference data for legal entities and counterparties. It is encouraging, though (and to continue the analogy), that industry participants have been invited to ride shotgun and offer directions. I don't think anyone minds that the regulators are steering an agenda the industry has had difficulty moving forward on its own—as long as they get it right. Keeping the industry engaged will be a key factor in ensuring a successful outcome.

A headshot of Ken Price, a man with short brown hair, wearing a white shirt and a striped tie.

The Avox logo, featuring the word "Avox" in a stylized blue font.

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**Ken Price,**  
CEO, Avox  
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**Richard Newbury, market development manager, SIX Telekurs:** For quite some time, regulation has been a driver in data management, but I think the main drivers at the moment remain the same as they always have been: operational efficiency and regulation. What has changed is the weight of each driver, though. In previous years, operational efficiency, cutting cost and dealing with increased volumes, was *de rigueur* and always seen as the major reason for reference data management projects. Efficiency was seen as a driver for cost reduction (through increasing STP) and regulation was seen as an annoyance and in some cases a box-ticking exercise.

Cost cutting is no longer the largest driver for projects. Paying the right price for the right quality to create efficiencies in shortening trading, clearing and settlement cycles and avoiding errors now appears to be more impor-

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**Matthew Bastian**  
(top), Director of  
Market and Business  
Development  
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4072), and **Scott  
Preiss**, Vice President,  
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tant than simply saving money on data contracts or team head-counts.

The bigger change though is the much more intrusive feel of regulation. Regulators are becoming better versed in the minutiae of the world of data management. We see regulators such as Esma and Eiopa setting standards for reporting in MiFID II and Solvency II, overlaps between Solvency II and Basel III requirements, and of course in the US, the OFR has mandated the LEI. It is the reaction to the regulations that is interesting. Firms are rightly identi-

fying overlaps and acting accordingly in their responses.

Karla McKenna, chair, ISO TC68: Regulators have recognized that the use of standards, especially international standards, is a key part of their data collection and analysis needs. While standardization of data elements, identifiers, schemes and codes have been part of the ongoing work of the financial industry, the publishing of requirements by global regulators, along with the imminent beginning of reporting, has refocused these efforts. For example, the prioritization of the development and implementation of a global LEI was a catalyst for industry and standards organizations to tackle this development first.

**In the past year, many data managers have commented that they are in a wait-and-see mode, as they are yet to see detailed information about some of the coming regulatory requirements. What can firms do to prepare for change right now?**

**Bands:** 'Wait-and-see' is an accurate description of the prevalent mood, primarily because so much is happening in this space, in different places, but all with (seemingly) convergent agendas. During this phase, the best thing financial firms can do is to adopt a proactive

position of engaging with the discussions to keep informed, but also to contribute to the dialogue—especially presenting an end-user perspective in what is often a regulator/vendor-driven dynamic.

**Price:** The beauty of the LEI initiative is the regulatory requirement for the LEI and the associated core data to be made freely available to all industry players. As such, the cost and effort of linking to any existing entity identifier issued by a vendor that is committed to free distribution of its entity identifier cross-referenced to the LEI will be completely re-useable.

**Cox:** Since many regulatory requirements relate to pulling data out of systems, firms need to ensure those systems are flexible enough to implement enhanced reporting. The flexibility has to be built in, and this can help avoid the use of offline processes. A lot of the data will already exist in the systems, but the data can be stored in isolation.

To meet new requirements, data will typically need to be extracted from different systems and packaged up in the required format. Firms can't really plan until we know what the specific requirements are, of course. All we can do is to ensure the business knows that the market expects additional regulation around reporting. Firms can also ensure they have the right people, with the

necessary expertise and skillsets, in their organizations.

In addition, it is important to work very closely with the data vendors to ensure readiness. The vendors should know that these changes are coming down the pipe, but it's about working with them to ensure they properly appreciate the full implications of those changes, such as the collection of new data types, for example.

**Bastian:** When it comes to the LEI, the wait-and-see attitude, which also turned up in an informal poll conducted by an enterprise data management software vendor, is surprising. The OFR recently issued a statement that moved the time-frame for implementing a common legal entity identifier back until 2012, stating that while progress has been made, more work remains to be done. That buys industry participants some time, but a mandate of some fashion looks likely by next spring. Data managers would be wise to set aside a portion of the 2012 budget

**"Data managers would be wise to set aside a portion of the 2012 budget for the inevitable mapping project to link existing codes to the new standard"**

*Matthew Bastian, Cusip Global Services*

## Virtual Roundtable

for the inevitable mapping project to link existing codes to the new standard. Firms should also stay engaged and keep up with developments, as some concepts are beginning to take shape even if the imprimatur has yet to be given. For example: know what's in the Global Financial Markets Association recommendation, what the Association of National Numbering Agencies' (Anna) role would be, and the basic features of ISO 17442. (A workshop being hosted by the Financial Stability Board at the end of September should bring some additional focus, so look for any results coming out of those meetings.) The cynical view is that the LEI will be just another code—perhaps true, but it's also a code that will be mandatory for reporting transactions. It is difficult, of course, to plan for that which may change, but anyone who waits for the dust to completely settle may have a tough time playing catch-up.

**Newbury:** In the data vendor world, our customers quite rightly expect us to have in place all the data and solutions they need as soon as new regulations come into force. Unfortunately, we have much less clout with regulators than do firms, and certainly don't have an inside track on what we should be developing. It is true that there is a hiatus at the moment. If firms haven't already done

so though, they should be engaging with regulators through their supervisors, data vendors, industry groups such as ISITC and the MiFID Forum and software suppliers to try to form a view on what the demands on their own data management are going to be, and to see what potential solutions will be on offer. For example, at SIX Telekurs we have analyzed the current batch of regulations where we believe we can bring benefit to customers, and are monitoring any new developments. We have prepared to implement the changes we consider to be the most likely ones swiftly and have allowed leeway for additional changes, both in analysis and in implementation resource.

### **What do you see being the biggest standardization challenge for the reference data industry?**

**Bands:** The notion of standardization supported by a centralized system of data collection and monitoring, across the reference data landscape, has been on the agenda for some years, especially relating to the key areas of instrument and entity identification, and the logical linkages between the two. The main challenge, as I see it, lies in the issue of data quality. Beyond the conundrum of what identifier will be used as the standard lie the many risks of using bad data for forensic analysis, automation,

creation of market transparency, regulation, systemic risk diagnosis etc.

Recognizing quality as an issue, it is comforting to note the Trade Association group that recently made recommendations to the US OFR for the creation of the LEI service has incorporated recommendations of the provision of services for the collection, maintenance, assignment and quality assurance of LEIs.

**Price:** By far the biggest challenge in the legal entity space will be to convince all authoritative sources, including entities themselves, to make up-to-date, core and parental hierarchy information necessary for reliable entity identification freely available regardless of the jurisdiction of usage.

**Cox:** Legal entity identification. Introducing a new LEI is a big change. There is some direction coming out of the States which is useful, and I also think it's really important that European requirements are factored in at the earliest opportunity. The other issue with the LEI is that we have to make sure it doesn't become just another identifier.

Scott Preiss, vice president, Cusip Global Services: I see the primary standardization challenges for the reference data industry traveling along two distinct paths. First, the "standardiza-

tion" process itself raises important, relevant questions today, including: do most market practitioners understand how the standards process works? How are standards developed? How can each of us participate, and what is the national and cross-border voting and review process? How do I ensure my institution's views and interests are considered in the development and implementation of a new standard?

In some respects, recent regulatory requirements have unintentionally "deputized" national and global standards bodies in a manner not previously contemplated. While CGS has been a long-time supporter of standards bodies and their work, market practitioners would be well-served to ensure there is a clearly defined—and well-understood—governance structure in place within these bodies, especially in light of several current critical industry initiatives. The standards process should embrace diverse views from across the financial

**"The standards process should embrace diverse views from across the financial services sector, and be prepared for participation from non-profit and profit-driven contributors"**

*Scott Preiss, Cusip Global Services*

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**Richard Newbury,**  
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services sector, and be prepared for participation from non-profit and profit-driven contributors alike.

I see the second path of challenges as much more specific and tactical: the accelerated movement toward a standardized LEI. There has been significant recent buzz in the financial services segment around the LEI initiative, and rightfully so given its broad potential impact. In practice, however, agreement to coalesce around a common, global coding structure for business entities does not translate into an immediate and available solution.

Market practitioners will likely continue to support a variety of existing internal and market-available entity IDs, and gradually map them to the standard LEI as it becomes available. Under any scenario, this is a multi-year rollout, and one that likely includes the

necessity of maintaining mappings into the future. We are encouraged that the proposed LEI roadmap includes close participation between Anna and the LEI utility, which seemingly gives this initiative a much higher probability of timely execution and adoption.

**Newbury:** In the standardization of data content itself, the biggest upcoming challenge is the LEI. It appears simple to issue an identifier per legal entity and then make sure it is used. However, as with all standardization efforts, there is one larger challenge: adoption. The sheer number of regulations and laws passed that will become regulation means even those of us lucky enough to be able to dedicate a large part of our working day to them sometimes have trouble keeping up. Making sure that the pertinent part of each regulation is socialized throughout the industry to traders, middle office, back office and IT staff is a gargantuan job for compliance managers. Again, in our hugely computerized industry, making sure every aspect of as-yet-unknown rules is catered for in an effective and complete way is difficult. A centralized data hub might be capable of accepting the changes, but propagating those changes into thousands of downstream systems and workflows is a challenge that cannot be taken too lightly.

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## 2011 events

Hosted by Inside Market Data, Inside Reference Data, Buy-Side Technology, Sell-Side Technology and Waters magazine, the WatersTechnology series of events are the leading financial data management and technology conferences for information and systems professionals working at financial trading firms around the world.

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### December

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## Virtual Roundtable



*Karla McKenna,  
chair, ISO TC68*

**McKenna:** I see several challenges. But if I had to pick only one, it would be designing and implementing a solution that addresses the issues faced by producers and users of reference data

that is not as onerous, costly and limiting as the issues themselves. Delivering such a solution requires recognizing the integrated nature of the data as well as leveraging improvements in the technology to model data and to process, transport and store information.

**The utility concept has been discussed for several years now. What would it mean for the industry if regulators were to step in and create an industry-wide reference data utility? Would the data from the utility be seen as credible?**

**Bands:** In 2009, the European Central

Bank outlined the concept of its Securities Reference Data utility, the Centralised Securities Database (CSDB). The articulation it provided of the concept was both broad in its topical coverage and incisive in its exposition of the many challenges of creating such a utility. It is available on the internet and worth a read. To answer the question, however, from a financial services provider end-user perspective, the creation of such a utility would address many of the serious and systemic issues we face with remaining compliant in our increasingly regulated world. Would the data from the utility be seen as credible? To be used, it would have to be! Perfect public data created and propagated as perfect electronic data.

**Price:** This is ultimately what is happening in the LEI space. The global regulatory community is coming together to agree on LEI data standards in conjunction with a number of international industry trade associations. It is this collaboration between regulators and industry that will maximize the commitment to and adoption of a legal entity identifier utility. I don't see the regulators necessarily creating a far-ranging reference data utility, rather the industry will likely create a utility to provide the data necessary so position and transaction reporting will include LEIs, to enable systemic risk analysis.

**"The global regulatory community is coming together to agree on LEI data standards"**

*Ken Price, Avox*

**Cox:** If it was driven and led by regulators, it should be taken as a credible data source. But for this to work, regulators themselves would have to employ staff that fully understand what goals they want to achieve and what the impact on the industry would be. In the first instance, we might find that a utility is set up as a joint effort between the industry and regulators. That utility would have to be seen as a not-for-profit enterprise, not as a revenue-generating opportunity. It's got to be done for the right reasons.

**Preiss:** Here's the first thought that comes to mind when asked about regulators "stepping in and creating an industry-wide reference data utility": is that really a regulatory role?

We are still navigating through a period in financial history where understanding and mitigating systemic risk is on everyone's radar.

As we have learned, managing risk is based, at least in part, on timely access to accurate, actionable market and reference data. It seems to me that regulators have enough on their plate these days, and may not be in the optimal position to collect, standardize and distribute timely reference data. It's a given that there are a variety of existing information providers who already have the infrastructure, expertise and sustained investment required

**"Would the data from the utility be seen as credible? To be used, it would have to be! Perfect public data created and propagated as perfect electronic data"**

*Mark Bands, ANZ Institutional Bank*

to provide this data to global users in a variety of useable formats.

The presence of multiple and capable data providers in this space serves as the strongest argument and safeguard against a single reference data repository: choice. Reliance on a single, potentially inaccurate source of reference data seemingly runs counter to the very notion of reducing risk. Giving market participants choices among competing providers maintains a critical component of data checks and balances, and ensures all users will not end up with the same—and potentially incorrect—foundational data.

**Newbury:** SIX Group already runs a utility called Connexor, which allows issuers of structured products to publish reference data on their product through one single channel, which then provides a listing on SIX Swiss Exchange (if required), a Valor Number from SIX Telekurs and a reference data

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Mark Bands, ANZ  
Institutional Bank

set that is supplied onward to other data vendors. The solution works very well, and with a minimum amount of data manipulation involved, users of the information from our data products or those

of our competitors can be sure they are using the data the issuer intended them to see.

The types of utilities discussed in the industry are slightly different to this. The main proponent of such a utility in Europe has been listening and has changed the suggested model in reaction to feedback and should be congratulated for this openness. The question of credibility of the model and of the reliability of the data is still to be proven.

The main concern of firms who would be the main end-users of the data is that of liability. Liability for errors remains

with banking firms providing services to their customers. At present, the liability is managed by multi-sourcing and scrubbing of data. Sometimes a difference can prove to be a competitive advantage in trading, other times it can prove to be the cause of a trade failure. The utilities that have been discussed break the flow in the chain of data from issuer to user, and therefore risk is introduced as data is reinterpreted and transformed.

Additionally, it is possible that the sheer scale of the operation to provide reference data for all the world's financial instruments through a single utility has been underestimated. A utility can be a great benefit, but the ones being discussed on both sides of the Atlantic look more likely to introduce a single point of failure and increase risk, rather than mitigate it.

**"We are still navigating through a period in financial history where understanding and mitigating systemic risk is on everyone's radar"**

*Scott Preiss, Cusip Global Services*

**The large number of new regulatory requirements being pushed out at the same time has resulted in concerns about costs of implementation and risk associated with making the changes. How important is it to involve regulators in industry discussions to ensure there is a common understanding of the challenges faced by the industry?**

**Bands:** The very current example of the US Foreign Account Tax Compliance

Act initiative speaks volumes about the importance (absolute necessity?) of regulators being involved in industry discussions. I'll say no more!

**Price:** Extremely important. One of the major costs faced by financial institutions is disparate regulatory reporting requirements. By collaborating and ultimately harmonizing at least some of these reporting standards (which include data, technology, language and analytics), regulators will enjoy higher-quality information from financial institutions because those firms can focus their energy on fewer reports.

**Cox:** It's crucial to involve regulators in wider industry discussions. Regulators seem well-disposed to working with the industry to make sure we're taking the right approach. The risks associated with introducing new regulation shouldn't be underestimated. Processes implemented for regulatory ends should be meaningful to the person producing the work, and to the person looking at it. Risk arises when this requirement is not addressed.

A classic example would be reporting on derivatives trading. If the objective is to understand the trail of data on one of these trades, then the regulation needs to look at all the individual data requirements. The data then needs to be presented in a way that makes

it very clear what the lifecycle of that trade is.

**Bastian:** As difficult as it has been to build consensus around a common LEI—"herding cats" comes to mind—it's likely we will look

back at the consensus process as having been the easy part. It's the mammoth task of implementing the new standard, and the related costs and risks involved, that is not to be underestimated. Thousands of records and counterparty IDs, whether internal or vendor-supplied, will have to be mapped to the new codes, creating a like number of potential points of failure when firms start reporting under the new standard. Will data vendors step up to offer this service? Will it have to be dealt with internally? Those are still open questions for which firms will need some guidance.



*Matthew Cox,  
BNY Mellon*

**"Processes implemented for regulatory ends should be meaningful to the person producing the work"**

*Matthew Cox, BNY Mellon*

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Ideally, regulators should always have some idea of the impact their mandates will have on a given industry or its participants. History has shown that regulations formed inside the vacuum of the Beltway or Brussels can have serious, unintended consequences. That is why the OFR's engagement of the industry has been most encouraging. A collaborative effort will help ensure regulatory needs and legislative mandates are met, while at the same time minimizing the potential for wasted resources or non-compliance problems within financial firms.

**Newbury:** Regulatory bodies rightly came in for some criticism after the financial crisis, and have held their hands up to their shortcomings. They promised a much more intrusive and rules-based style of regulation, and we are beginning to see this now. Regulators are not in the mood to compromise and firms have understood this too. To the credit of the

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*Matthew Bastian, Cusip Global Services*

entire industry, though, this has not resulted in animosity, but rather in an increase in dialogue. Although they are being more intrusive, regulators are not trying to catch firms out to punish them, but rather are seeking a more open and clearer dialogue to help make sure regulations are adhered to and that businesses are run properly. Firms, equally, are looking to make sure they are running their businesses properly and are relying on regulators to guide them through the maze of rules.

There is a general consensus that regulators are more open to listening and learning, but still a feeling that perhaps the guidance can be clearer and more timely in the other direction.

**McKenna:** Regulators have been key stakeholders in the development of ISO standards traditionally in automotive safety, consumer protection, environmental and construction standards to name a few. We are now seeing renewed and expanded interest from regulators to participate directly in the development process for standards to address their data collection and analysis of financial and economic data.

As standardizers, we welcome the opportunity to work directly with regulators in the development and governance processes for financial services standards.

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# Setting the Standards

*Inside Reference Data speaks to Bill Nichols, associate director of information standards, Office of Financial Research (OFR), about being at the center of the standards-setting process*



Bill Nichols, OFR

## **What is your role at the OFR?**

One of the most important roles of the OFR is to promote standards for financial data that will improve transparency, risk management and regulation, while reducing processing and reporting costs.

As the associate director of information standards at the OFR, I will be responsible for collaborating with regulators and the private sector to establish these important standards. I will also be responsible for seeing data standards are used internally in all operations of the Office.

## **What is currently your main area of focus?**

Currently, my primary focus has been the legal entity identifier (LEI), which has taken the majority of my time to date. The international community in particular is getting focused on the LEI, and we're now getting to the point where enough people in both the industry and the regulatory community are saying: "This is important, let's talk about it."

I'm spending a lot of my time thinking about integration and migration issues and strategies, including things like what types of technical alternatives could be considered working with domestic and international standards and regulatory bodies. Fortunately, it's an issue that has been faced in other industries, and there are some proven technologies and methods that have dealt with these issues that may be leveraged. In addition to this, my focus has been to assist in building the Office and to put a roadmap together for information standards.

## **What can the industry do to help the OFR?**

Continue to get in the game. On a broader level, engage us. The OFR was created as a direct response to a set of problems that cut across both industry and the regulatory communities. We need and want industry dialogue. Pick up the phone, send an email. Talk to your colleagues. Offer solutions; work with others in the industry.

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