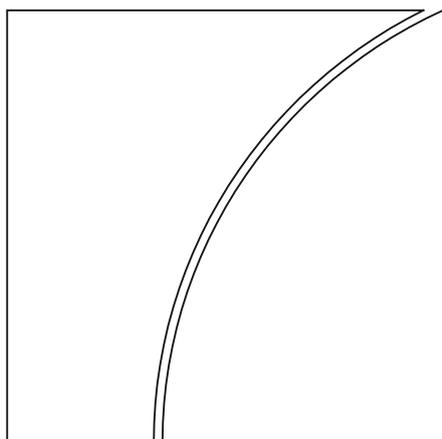


Committee on  
Payments and Market  
Infrastructures

Board of the International  
Organization of Securities  
Commissions

Consultative report

Harmonisation of critical  
OTC derivatives data  
elements (other than UTI  
and UPI) – second batch



October 2016



BANK FOR INTERNATIONAL SETTLEMENTS



**OICU-IOSCO**

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## Executive summary

In 2009, the G20 Leaders agreed that all over-the-counter (OTC) derivatives contracts should be reported to trade repositories (TRs) as part of their commitment to reform OTC derivatives markets in order to improve transparency, mitigate systemic risk and prevent market abuse. Aggregation of the data reported across trade repositories will help authorities get a comprehensive view of the OTC derivatives market and its activity.

The purpose of this consultative report is to help develop guidance to authorities on definitions for the second batch of critical data elements that are important for the globally consistent and meaningful aggregation of data on OTC derivatives transactions, other than the Unique Transaction Identifier (UTI) and the Unique Product Identifier (UPI). As in the case of the first batch, this second batch of critical data elements was selected from Annex 2 (“Illustrative list of potential data fields for OTC derivatives”) of the January 2012 CPSS-IOSCO *Report on OTC derivatives data reporting and aggregation requirements*.<sup>1</sup> In addition to these selections, related data elements were considered for inclusion, mainly with a view to more accurately capturing the substance of OTC derivatives transactions. A consultation on a third batch of critical data elements (other than the UTI and UPI) is planned for 2017. The final consolidated list of all critical data elements (other than the UTI and UPI), combining the three batches, will be the outcome of a dynamic and iterative process that takes into consideration feedback from commenters.

For each of the critical data elements in the second batch, individual tables specify the “definitions”, containing the definition, naming convention, standard, format, list of allowable values and cross-references for identifying interdependencies between data elements. In the annex to this consultative report each data element is also illustrated with at least one example demonstrating how it supports authorities’ data needs. The guidance aims to provide consistent “definitions” of data elements with the same characteristics, referencing existing industry standards where these exist, and allowing for application independent from the chosen communication protocol. For some data elements of the second batch, more than one harmonisation alternative is proposed and discussed. Comments on the relative merits of each alternative are solicited.

The Committee on Payments and Market Infrastructures (CPMI) and the International Organization of Securities Commissions (IOSCO) request comments on the proposed “definitions” for each critical data element, considering whether it:

- provides sufficient guidance to authorities to support consistent data reporting and meaningful global data aggregation;
- appropriately reflects different market practices existing at a global level; and
- appropriately reflects current industry standards that may already be in use globally.

In addition, the CPMI and IOSCO invite comments on specific questions included in Section 2 of this consultative report.

Besides this consultative report, the CPMI and IOSCO have already issued a consultative report on the harmonisation of a UTI for OTC derivatives transactions,<sup>2</sup> two consultative reports on the harmonisation of a UPI<sup>3</sup> and one on the harmonisation of a first batch of critical data elements other than UPI and UTI (CDE).<sup>4</sup>

<sup>1</sup> This report is also referred to as the Data Report.

<sup>2</sup> See CPMI-IOSCO, *Harmonisation of the Unique Transaction Identifier*, August 2015, [www.bis.org/cpmi/publ/d131.htm](http://www.bis.org/cpmi/publ/d131.htm).

<sup>3</sup> See CPMI-IOSCO, *Harmonisation of the Unique Product Identifier – consultative report*, December 2015, [www.bis.org/cpmi/publ/d141.htm](http://www.bis.org/cpmi/publ/d141.htm) and [www.bis.org/cpmi/publ/d151.htm](http://www.bis.org/cpmi/publ/d151.htm).

<sup>4</sup> See CPMI-IOSCO, *Harmonisation of key OTC derivatives data elements (other than UTI and UPI) – first batch – consultative report*, September 2015, [www.bis.org/cpmi/publ/d132.htm](http://www.bis.org/cpmi/publ/d132.htm).



# 1. Introduction

## 1.1 Background

In 2009, the G20 Leaders agreed that all over-the-counter (OTC) derivatives contracts should be reported to trade repositories (TRs) in order to improve transparency, mitigate systemic risk and prevent market abuse.<sup>5</sup> At present, a total of 20 TRs or TR-like entities are authorised and operating, for at least some asset classes, in member jurisdictions of the Financial Stability Board (FSB).<sup>6</sup> In five jurisdictions, government authorities or other TR-like entities currently collect OTC derivatives transaction reports. Aggregation of the data being reported across these repositories will help authorities to obtain a comprehensive view of the OTC derivatives market and its activity.

In September 2014, the FSB published a feasibility study on options for a mechanism to produce and share global aggregated OTC derivatives TR data. This "Aggregation Feasibility Study"<sup>7</sup> concluded that "it is critical for any aggregation option that the work on standardisation and harmonisation of important data elements be completed, including in particular through the global introduction of the Legal Entity Identifier (LEI), and the creation of a Unique Transaction Identifier (UTI) and Unique Product Identifier (UPI)".

## 1.2 CPMI-IOSCO working group for harmonisation of key OTC derivatives data elements

Following the Aggregation Feasibility Study, the FSB asked the CPMI and IOSCO to develop global guidance on the harmonisation of data elements reported to TRs that are important for the aggregation of data by authorities.<sup>8</sup> The FSB also said it would work with the CPMI and IOSCO to provide official sector impetus and coordination for the further development and implementation of uniform global UTIs and UPIs.

In November 2014, the CPMI and IOSCO established a working group for the harmonisation of key OTC derivatives data elements (Harmonisation Group). The Harmonisation Group's mandate is to develop guidance regarding the definition, format and usage of key OTC derivatives data elements, including UTI and UPI. The Harmonisation Group acknowledges that the responsibility for issuing requirements on the reporting of OTC derivatives transactions to TRs falls within the remit of the relevant authorities. The mandate of the Harmonisation Group does not include addressing issues that are planned or are already covered by other international workstreams, such as the legal, regulatory and technological issues related to the implementation of a global aggregation mechanism, or the governance and legal issues related to the UTI and UPI.<sup>9</sup>

<sup>5</sup> TRs are also known as swap data repositories (SDRs) in the United States.

<sup>6</sup> See Financial Stability Board, *OTC Derivatives Market Reforms: Eleventh Progress Report on Implementation*, [www.fsb.org/2016/08/otc-derivatives-market-reforms-eleventh-progress-report-on-implementation/](http://www.fsb.org/2016/08/otc-derivatives-market-reforms-eleventh-progress-report-on-implementation/).

<sup>7</sup> See Financial Stability Board, *Feasibility study on approaches to aggregate OTC derivatives data*, September 2014, [www.financialstabilityboard.org/wp-content/uploads/r\\_140919.pdf](http://www.financialstabilityboard.org/wp-content/uploads/r_140919.pdf).

<sup>8</sup> The CPMI and IOSCO have previously conducted work related to the reporting of data elements to TRs, and data aggregation. In January 2012, the CPSS (the former name of CPMI) and IOSCO published the *Report on OTC derivatives data reporting and aggregation requirements*, which recommends minimum data reporting requirements and gives general guidance about reporting formats ([www.iosco.org/library/pubdocs/pdf/IOSCOPD366.pdf](http://www.iosco.org/library/pubdocs/pdf/IOSCOPD366.pdf)).

<sup>9</sup> With the Harmonisation Group advancing in its work, the FSB established a governance working group in early 2016 to take forward the development of governance arrangements for the UTI and UPI. The primary objective of this group is to propose recommendations for governance arrangements for each identifier to the FSB Plenary, while working closely with the Harmonisation Group. Further upcoming work will comprise: (i) taking steps to address the legal and regulatory changes that

The Harmonisation Group has already issued a consultative report on proposals and options for guidance on UTIs for OTC derivatives transactions, two consultative reports on UPIs and one on a first batch of key data elements other than the UPI and UTI. During 2017, the Harmonisation Group also plans to issue further consultative reports on a third batch of data elements, other than UTI and UPI, for OTC derivatives transactions.

### 1.3 Critical data elements other than UTI and UPI

Besides guidance on the UTI and UPI, the CPMI and IOSCO aim to produce clear guidance to authorities on definitions, format and usage of critical data elements other than the UTI and UPI that are important for consistent and meaningful aggregation on a global basis. This guidance – together with guidance on the UTI and UPI – should aim to help ensure that the authorities’ needs as defined in the 2013 CPSS-IOSCO report *Authorities’ access to trade repository data*<sup>10</sup> and the Aggregation Feasibility Study are met.<sup>11</sup>

After having received feedback from the industry on the first batch of critical data elements other than the UTI and UPI, the Harmonisation Group is now publishing a second batch of these critical data elements. The report focuses on data elements either representing dates, times and identifiers or pertaining to cash flows. Moreover, some data elements specific to certain instruments (such as options and CDS) are included in view of providing guidance to authorities which have jurisdiction over these instruments and where these instruments fall within OTC derivatives reporting requirements. The final list of critical data elements, other than the UTI and UPI, will be the outcome of a dynamic and iterative process that takes into consideration feedback from commenters.

For each of the critical data elements included in the second batch, individual tables specify the “definitions”, containing the definition, extended naming convention,<sup>12</sup> standard, format, list of allowable values and cross-references for identifying interdependencies between data elements. In the annex to this consultative report, each data element is also illustrated with at least one example demonstrating how it supports authorities’ data needs. The envisaged guidance aims to provide consistent “definitions” of data elements with the same characteristics, referencing existing industry standards whenever possible, and allowing independent application from the chosen communication protocol. The guiding principles of the harmonisation methodology described in the consultative report for the first batch have been adopted to develop this consultative report for the second batch. For some data elements of the second batch, more than one harmonisation alternative is proposed and discussed.

would be needed to implement a global aggregation mechanism that would meet the range of authorities’ data access needs; (ii) studying the data and technological requirements for an aggregation mechanism so as to better support a more detailed project specification; and (iii) undertaking a more detailed assessment of potential cost, beyond the initial discussion of cost drivers provided in the Aggregation Feasibility Study, based on further analysis of the business requirements and priorities of the authorities and complexity of the use cases.

<sup>10</sup> See CPSS-IOSCO, *Authorities’ access to trade repository data*, August 2013, [www.bis.org/cpmi/publ/d110.htm](http://www.bis.org/cpmi/publ/d110.htm). This report is also referred to as the Access Report.

<sup>11</sup> “[The functional approach employed in the Access Report] maps data needs to individual mandates of an authority and their particular objective rather than to a type of authority. These mandates may evolve over time. They include (but are not limited to): 1) Assessing systemic risk, 2) Performing general macro assessments, 3) Conducting market surveillance and enforcement, 4) Supervising market participants, 5) Regulating, supervising or overseeing trading venues and financial market infrastructures (FMIs), 6) Planning and conducting resolution activities, 7) Implementing currency and monetary policy, and lender of last resort, 8) Conducting research to support the above functions” (Aggregation Feasibility Study, p 13).

<sup>12</sup> Differently from the consultative report on the first batch, the individual tables include only the extended version of the data element’s name and not anymore its name string, because the Harmonisation Group acknowledges that name strings are not intended for harmonisation. Name strings are only provided in Annex 1, to make it easier for the reader to track any potential change to the extended naming convention in the final report.

## 1.4 Organisation of this report and feedback to consultation

This report is organised as follows. Section 2 sets out the harmonisation proposal in individual tables, data element by data element. In Annex 1, Table 1 shows how the data elements considered so far by the Harmonisation Group are grouped; Table 2 gives a non-exhaustive list of examples showing how each data element could be used to support authorities' data needs; and Table 3 clarifies the formats used in the Section 2 tables.

Comments and suggestions are welcome on any aspect of the full set of harmonisation proposals in Section 2. Please be as specific as possible in your response. In particular, the CPMI and IOSCO invite comments on the questions included in Section 2. Comments on proposals and alternatives and responses to general and specific questions are solicited by 30 November 2016 and should be sent to the secretariats of both the CPMI ([cpmi@bis.org](mailto:cpmi@bis.org)) and IOSCO ([cde@iosco.org](mailto:cde@iosco.org)) using the dedicated form. The submitted form with comments will be published on the websites of the BIS and IOSCO unless respondents specifically request otherwise.

In making comments and providing responses to the questions, it would be helpful if respondents could consider the following:

- Whether the presented proposals are appropriate for consistent data collection with a view to meaningful global aggregation.
- Whether the consultative guidance is unambiguous.
- Whether the proposed definitions, formats and granularity level in allowable values appropriately capture different market practices at a global level, or are consistent with standards that may already be in use globally. If not, please specify which definition, format or list of allowable values requires modification, the reasons why, and your suggested alternative.
- Whether the details and the specifications in the consultative report are sufficiently clear and what other details and specifications would, in your opinion, add value.
- Whether examples might be needed to further clarify the usability of the guidance in practice.
- Alternative proposals, other than the ones presented in this report, that would, in your view, be preferable to achieve the stated goals of this report. Please describe them.

## 2. Harmonisation of the second batch of critical data elements other than the UTI and UPI

### 2.1 Reporting timestamp

Definition	The date and time the report of a transaction or life cycle event was submitted by the reporting party to the trade repository.
Existing industry standard	ISO 8601 / UTC
Format	YYYY-MM-DDThh:mm:ssZ
Allowable values	Any valid date/time formatted as described above and falling after or on the execution timestamp.
Related data elements/ dependencies between data elements	Execution timestamp

## 2.2 Execution timestamp

Definition	The date and time the transaction was originally executed. For centrally cleared transactions, the execution timestamp captures when the novated transaction was created.
Existing industry standard	ISO 8601 / UTC
Format	YYYY-MM-DDThh:mm:ssZ If the time element is not required in a particular jurisdiction, time may be dropped given that – in case of reduced accuracy – ISO 8601 allows values to be dropped from any of the date and time representations, in the order from least to most significant.
Allowable values	Any date/time formatted as described above and falling before or on the reporting timestamp.
Related data elements/ dependencies between data elements	Reporting timestamp

## 2.3 Final settlement date

Definition	The final contractual date on which a derivatives transaction will be or was settled, that is, the actual day (based on UTC) on which transfer of cash or assets is completed. The final settlement date should remain blank for CDS contracts until the default of the underlier.
Existing industry standard	ISO 8601 / UTC
Format	YYYY-MM-DD
Allowable values	<ul style="list-style-type: none"><li>• Any valid date formatted as described above</li><li>• Null in the case the final settlement date is not known</li></ul>
Related data elements/ dependencies between data elements	Settlement method (batch 1); settlement currency

**Q1: With reference to the definition proposed for the data element “final settlement date” (Section 2.3), is it sufficiently clear that the settlement date for options and swaptions is the date on which the option or swaption would settle if it was exercised on the expiry date? If not, should additional language be added to the definition to clarify that?**

## 2.4 Settlement currency

Definition	The currency for the cash settlement of the transaction.
Existing industry standard	ISO 4217
Format	Char(3)
Allowable values	Currencies included in ISO 4217 and CNH, where CNH refers to offshore renminbi.
Related data elements/ dependencies between data elements	Final settlement date; notional currency (batch 1): it may or may not coincide with the “notional currency” of any leg.

**Q2: With reference to the definition proposed for the data element “settlement currency” (Section 2.4), is it sufficiently clear that the settlement currency of swaptions is the currency of the underlying swap? If not, should additional language be added to the definition to clarify that?**

## 2.5 Confirmed

Definition	For new transactions, whether the legally binding terms of an OTC derivatives contract were documented and agreed upon or not (unconfirmed). If documented and agreed, whether such confirmation was done via a shared confirmation facility or platform, or a private/bilateral electronic system (electronic) or via a human-readable written document, such as fax, paper or manually processed e-mails (non-electronic).
Existing industry standard	ISO 20022: Trade Confirmation Type Code (provisionally registered in ISO 20022)
Format	Char(4)
Allowable values	<ul style="list-style-type: none"><li>• YCNF = unconfirmed</li><li>• ECNF = electronic</li><li>• NCNF = non-electronic</li></ul>
Related data elements/dependencies between data elements	

## 2.6 Day count convention

Definition	For each leg type, where applicable: The day count convention (often also referred to as day count fraction or day count basis or day count method) determines how interest payments are calculated. It is used to compute the year fraction of the calculation period, and indicates the number of days in the calculation period divided by the number of days in the year.
Existing industry standard	ISO 20022: Interest Calculation / Day Count Basis
Format	Varchar(4)
Allowable values	<ul style="list-style-type: none"> <li>• A001=IC30360ISDAor30360AmericanBasicRule</li> <li>• A002=IC30365</li> <li>• A003=IC30Actual</li> <li>• A004=Actual360</li> <li>• A005=Actual365Fixed</li> <li>• A006=ActualActualICMA</li> <li>• A007=IC30E360orEuroBondBasismodel1</li> <li>• A008=ActualActualISDA</li> <li>• A009=Actual365LorActuActubasisRule</li> <li>• A010=ActualActualAFB</li> <li>• A011=IC30360ICMAor30360basicrule</li> <li>• A012=IC30E2360orEurobondbasismodel2</li> <li>• A013=IC30E3360orEurobondbasismodel3</li> <li>• A014=Actual365NL</li> <li>• NARR=Narrative</li> <li>• Null in the case there is no interest to be paid.</li> </ul>
Related data elements/ dependencies between data elements	

The day count convention is identified for each leg type, where applicable. Besides the day count convention, a set of data elements is associated with each leg type, some of which might be populated only for specific leg types. For example:

- Leg type (having for example as allowable values: *Fixed/Float*): to be discussed in the next consultative report on the data elements other than the UTI and UPI
- Notional amount
- Notional currency
- Day count convention
- Payment frequency period
- Payment frequency period multiplier

## 2.7 Payment frequency period

	<i>Harmonisation proposal</i>	<i>Advantages and disadvantages of alternatives proposed/outstanding issues</i>
Definition	A time unit associated with the frequency of payments, eg day, week, month, year or term of the stream.	
Existing industry standard	ISO 20022 InterestCalculation / PaymentFrequency	
Format	Varchar(4)	
Allowable values	<p>Alternative 1:</p> <ul style="list-style-type: none"> <li>• DAIL = daily</li> <li>• WEEK = weekly</li> <li>• MNTH = monthly</li> <li>• MIAN = semiannual</li> <li>• WEEK = weekly</li> <li>• QURT = quarterly</li> <li>• YEAR = yearly</li> <li>• ADHO = ad hoc</li> <li>• INDA = intraday</li> <li>• OVNG = overnight</li> <li>• TEN = 10 days</li> <li>• FRTN = fortnightly</li> <li>• MOVE = triggered by movement</li> <li>• NULL = not applicable, in case there is no periodic payment for the leg type or if payments are irregular</li> </ul> <p>Alternative 2:</p> <ul style="list-style-type: none"> <li>• DAIL = daily</li> <li>• WEEK = weekly</li> <li>• MNTH = monthly</li> <li>• YEAR = yearly</li> <li>• ADHO = ad hoc</li> <li>• TERM = payment at term</li> <li>• NULL = not applicable, in case there is no periodic payment for the leg type or if payments are irregular</li> </ul>	<p>Advantages of alternative 1:</p> <ul style="list-style-type: none"> <li>– It is based on the most extensive list of allowable values available in ISO 20022 InterestCalculation / PaymentFrequency. It allows flexibility to use the relevant categories.</li> </ul> <p>Advantages of alternative 2:</p> <ul style="list-style-type: none"> <li>– It includes only those values allowable in ISO 20022 InterestCalculation / PaymentFrequency that are considered to be most relevant for OTC derivatives transactions. It avoids allowing the same frequency to be reported in more than one way (eg semiannual frequency would always be reported as “6 MNTH” as opposed to “1 MIAN” or “2 QURT” or “6 MNTH” under alternative 1).</li> </ul>
Related data elements/dependencies between data elements	Payment frequency period multiplier; leg type (forthcoming in an upcoming consultative report)	

**Q3: With reference to the alternatives proposed for the data element "payment frequency period" (Section 2.7):**

- (a) Are the advantages and disadvantages of the proposed harmonisation alternatives appropriately defined? If not, which aspects should be revised and how?**
- (b) Which of the proposed harmonisation alternatives should be supported and why? Is alternative 2 sufficiently broad to capture all the allowable values that are relevant for an OTC derivatives transaction? If not, which allowable values are missing? Should the list of allowable values under alternative 2 also include the value "intraday"? Please provide examples in which the additional allowable values that you propose would be relevant for an OTC derivatives transaction. Is it preferable to expand the list in alternative 2 with the missing allowable values or to opt directly for the most extensive list of allowable values available in alternative 1?**

## 2.8 Payment frequency period multiplier

Definition	For each leg type, where applicable: The number of time units (as expressed by the payment frequency period) that determines the frequency at which periodic payment dates occur. As an example, a transaction with payments occurring every two months should be represented with a payment frequency period of "MNTH" (monthly) and a payment frequency period multiplier of 2.
Existing industry standard	ISO 20022 RatePaymentFrequency1/Multiplier
Format	Num(18,0)
Allowable values	<ul style="list-style-type: none"> <li>Strictly positive value (ie excluding zero)</li> <li>Null in case there is no periodic payment for the leg type or if payments are irregular</li> </ul>
Related data elements/dependencies between data elements	<p>Payment frequency period.</p> <p>If payment frequency period is "ADHO", then the payment frequency period multiplier is 1.</p> <p>If payment frequency period is "NULL", then the payment frequency period multiplier is also Null.</p> <p>If payment frequency period is "TERM", then the payment frequency period multiplier is Null.</p>

## 2.9 Counterparty 1 (reporting counterparty)

Definition	<p>Identifier of the first counterparty to the derivatives contract. The counterparty to an OTC derivatives transaction fulfilling its reporting obligation should be identified in this data element.</p> <p>In jurisdictions where both parties must report the trade, the identifier of counterparty 1 will always identify the reporting counterparty.</p> <p>In the case of an OTC derivatives transaction executed by a fund manager on behalf of a fund, the fund and not the fund manager should be reported as counterparty.</p>
Existing industry standard	ISO 17442 Legal Entity Identifier (LEI)
Format	Char(20)
Allowable values	LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, <a href="http://www.gleif.org/">www.gleif.org/</a> ).
Related data elements/ dependencies between data elements	Identifier of beneficiary 1 (batch 1): if counterparty 1 is also beneficiary of the transaction, the identifier of the counterparty should be reported in both data elements (counterparty 1 and beneficiary 1).

## 2.10 Counterparty 1 type

Definition	Indicator of whether counterparty 1 is a legal entity as defined by LEI Regulatory Oversight Committee (ROC) or not. <sup>13</sup>
Existing industry standard	–
Format	Char(1)
Allowable values	<ul style="list-style-type: none"><li>• Y</li><li>• N</li></ul>
Related data elements/dependencies between data elements	Counterparty 1

<sup>13</sup>See section “The LEI” available at: <https://www.lei.org/lei.htm> (last visited July 7, 2016).

## 2.11 Counterparty 2

Definition	Identifier of the second counterparty to the derivatives contract. In case of a derivatives transaction executed by a fund manager on behalf of a fund, the fund and not the fund manager should be reported as counterparty.
Existing industry standard	ISO 17442 Legal Entity Identifier (LEI)
Format	Char(20)
Allowable values	LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, <a href="http://www.gleif.org/">www.gleif.org/</a> ), except for natural persons who are acting as private individuals (not business entities) Null if Counterparty 2 type is equal to N
Related data elements/ dependencies between data elements	Identifier of beneficiary 2 (batch 1): if counterparty 2 is also beneficiary of the transaction, the identifier of the counterparty should be reported in both data elements (counterparty 2 and beneficiary 2).

## 2.12 Counterparty 2 type

Definition	Indicator of whether counterparty 2 is a legal entity as defined by LEI ROC or not. <sup>14</sup>
Existing industry standard	–
Format	Char(1)
Allowable values	<ul style="list-style-type: none"> <li>• Y</li> <li>• N</li> </ul>
Related data elements/ dependencies between data elements	Counterparty 2

**Q4: In the consultative report on the first batch of data elements (other than the UTI and UPI), the Harmonisation Group proposed the harmonisation of the “identifier of the primary obligor”. Based on the feedback received during the public consultation, the Harmonisation Group is considering referring to the same concept with the term “beneficiary”. With reference to data elements “counterparty 1 (reporting counterparty)”, “counterparty 1 type”, “counterparty 2” and “counterparty 2 type” (Sections 2.9–12):**

**(a) Is it clear that in some jurisdictions the counterparty and beneficiary are always the same entity while in other jurisdictions they may or may not coincide?**

*For example, in the US the counterparty would always coincide with the beneficiary; in the EU this is not always the case as eg in a transaction concluded at the level of the umbrella fund, that fund would be identified as the counterparty, and the sub-fund as the beneficiary.*

*Is it necessary to further clarify the term “counterparty” or is it clear enough?*

**(b) Are there cases in which a transaction involves multiple counterparties that are jointly liable for the whole amount of the transaction? If so, how do you believe that multiple counterparties should be represented?**

**(c) In addition to reporting counterparty 2 type, what approach should be taken for natural persons not acting in a business capacity as counterparty 2?**

<sup>14</sup>ee section “The LEI” available at: <https://www.leiroc.org/lei.htm> (last visited July 7, 2016).

## 2.13 Report-submitting entity

Definition	The identifier of reporting counterparty. If the reporting counterparty has delegated the submission of the report to a third party or to the other counterparty, the identifier of that entity should be reported here.
Existing industry standard	ISO 17442 Legal Entity Identifier (LEI)
Format	Char(20)
Allowable values	LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, <a href="http://www.gleif.org/">www.gleif.org/</a> ).
Related data elements/ dependencies between data elements	Identifier of counterparty 1: if the reporting counterparty submits the transaction report itself, the identifier of the counterparty should be reported in both data elements (reporting counterparty and report-submitting entity).

## 2.14 Broker of counterparty 1

Definition	Identifier of the broker acting as an intermediary for counterparty 1.
Existing industry standard	ISO 17442 Legal Entity Identifier (LEI)
Format	Varchar(20)
Allowable values	<ul style="list-style-type: none"><li>○ LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, <a href="http://www.gleif.org/">www.gleif.org/</a>)</li><li>○ Null (not applicable) if there is no broker acting as an intermediary for counterparty 1</li></ul>
Related data elements/dependencies between data elements	

## 2.15 Central counterparty

Definition	Identifier of the central counterparty (CCP) that cleared the contract.
Existing industry standard	ISO 17442 Legal Entity Identifier (LEI)
Format	Varchar(20)
Allowable values	<ul style="list-style-type: none"><li>○ LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, <a href="http://www.gleif.org/">www.gleif.org/</a>) if the value of the data element "Cleared" is "Y" ("Yes, centrally cleared", for beta and gamma transactions)</li><li>○ Null (not applicable), if the value of the data element "Cleared" is "N" ("No, not centrally cleared") or "I" ("Intent to clear", for alpha transactions that are planned to be submitted to clearing)</li></ul>
Related data elements/ dependencies between data elements	<ul style="list-style-type: none"><li>○ Cleared (batch 1)</li><li>○ Reporting counterparty / counterparty 2: the identifier of the CCP should be reported in both data elements (counterparty and central counterparty)</li></ul>

## 2.16 Clearing member

Definition	<p>Identifier of the clearing member that cleared the derivatives contract.</p> <p>This data element is applicable for cleared transactions under both the agency clearing model and the principal clearing model.</p> <p>In the case of the principal clearing model, the clearing member is identified as clearing member and also as a counterparty in both transactions resulting from clearing: (i) in the transaction between the CCP and the clearing member; and (ii) in the transaction between the clearing member and the counterparty to the original alpha transaction.</p>
Existing industry standard	ISO 17442 Legal Entity Identifier (LEI)
Format	Varchar(20)
Allowable values	<ul style="list-style-type: none"> <li>○ LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, <a href="http://www.gleif.org/">www.gleif.org/</a>) if the value of the data element "Cleared" is "Y" ("Yes, centrally cleared", for beta and gamma transactions)</li> <li>○ Null (not applicable), if the value of the data element "Cleared" is "N" ("No, not centrally cleared") or "I" ("Intent to clear", for alpha transactions that are planned to be submitted to clearing)</li> </ul>
Related data elements/ dependencies between data elements	<ul style="list-style-type: none"> <li>○ Cleared (batch 1)</li> <li>○ Counterparty 1 / counterparty 2: if the clearing member is a counterparty to the transaction (principal clearing model), the identifier of the clearing member should be reported in both data elements (counterparty and clearing member)</li> </ul>

## 2.17 Platform identifier

Definition	The identifier of the trading facility (eg exchange, trading platform, trade reporting facility, swap execution facility) on which the transaction was executed.
Existing industry standard	ISO 10383 Market Identifier Code (MIC)
Format	Char(4)
Allowable values	ISO 10383 segment MIC code If no trading facility was involved in the transaction: <ul style="list-style-type: none"><li>• "XOFF" should be reported for transactions in listed instruments</li><li>• "XXXX" should be reported for transactions in instruments that are not listed in any venue</li></ul>
Related data elements/ dependencies between data elements	

## 2.18 Inter-affiliate

Definition	Indicates whether the transaction is between two counterparties that are affiliated entities, which are defined as such under local regulation of counterparty 1 (reporting counterparty). If there is no local definition, two entities are considered affiliated if the financial statements of both counterparties are reported on a consolidated basis based on the local accounting definition.
Existing industry standard	Not available
Format	Char(1)
Allowable values	<ul style="list-style-type: none"><li>• Y</li><li>• N</li></ul>
Related data elements/ dependencies between data elements	–

**Q5: Should the definition of the data element “inter-affiliate” (Section 2.18) take into account the possibility that there is no local definition of affiliated entities under the local regulation of counterparty 1 (reporting counterparty), or is this redundant?**

## 2.19 Booking location of counterparty 1

Definition	The location where the transaction is booked by counterparty 1. For example, the London area could be the location of a transaction booked by the London branch of a US legal entity.
Existing industry standard	ISO 3166-2
Format	Varchar(6)
Allowable values	Country and subdivision codes included in ISO 3166-2 Whenever locations within a country are identified according to more than one subdivision (eg regions, districts, departments), the list of allowable values should refer to the less granular subdivision (the top-level subdivision).
Related data elements	Identifier of counterparty 1, location of counterparty 1's trading desk

**Q6: With reference to the data element "booking location of counterparty 1" (Section 2.19), is it clear that the location where the transaction is booked for counterparty 1 refers to the location where profit and losses are allocated (be it the location of the headquarters, domestic branch or international branch)?**

## 2.20 Location of counterparty 1's trading desk

Definition	The location of the trader employed or engaged by counterparty 1 who is responsible for executing the transaction.
Existing industry standard	ISO 3166-2
Format	Varchar(6)
Allowable values	Country and subdivision codes included in ISO 3166-2. Whenever locations within a country can be identified according to more than one subdivision (eg regions, districts, departments) the list of allowable values should refer to the less granular subdivision (the top-level subdivision).
Related data elements	Identifier of counterparty 1, booking location of counterparty 1

**Q7: With reference to the data element "location of counterparty 1's trading desk" (Section 2.20), is it sufficiently clear who is being referred to as the trader "responsible for executing the transaction"?**

## 2.21 Strike price

Definition	The price (fixed or variable) at which the owner of an option can buy or sell the underlying of the option.
Existing industry standard	ISO 20022
Format	Num (18,13)
Allowable values	<p>Any value; null if it is not an option or the strike price is not known at the time of reporting.</p> <p>For example:</p> <p>The strike price of an option on equity (USD 6.4) should be reported as 6.4 in strike price and as NUMBER in strike price notation.</p> <p>The strike price of an option on commodities (USD 46.39) should be reported as 46.39 in strike price and as NUMBER in strike price notation.</p> <p>The strike price of an option on interest rates (2%) should be reported as 2 in strike price and as PERCENTAGE in strike price notation.</p> <p>The strike price of an option on FX (exchange rate 1.1014) should be reported as 1.1014 in strike price and as NUMBER in strike price notation.</p> <p>The strike price of a CDS swaption (25 basis points) should be reported as 25 in strike price and as BASIS POINTS in strike price notation.</p>
Related data elements/ dependencies between data elements	Strike price notation, contract type / UPI

## 2.22 Strike price notation

Definition	<p>Indicator of the notation of a strike price.</p> <p>Equity or commodities: the strike price notation will be NUMBER.</p> <p>Interest rates: the strike price notation will be PERCENTAGE.</p> <p>FX: the strike price notation will be NUMBER, in the form of an exchange rate.</p> <p>Credit (CDS swaptions): the strike price notation will be BASIS POINTS.</p>
Existing industry standard	–
Format	Varchar(12)
Allowable values	<ul style="list-style-type: none"> <li>– NUMBER</li> <li>– PERCENTAGE</li> <li>– BASIS POINTS</li> <li>– Null = if the strike price is not known at the time of reporting; if it is not an option.</li> </ul>
Related data elements/dependencies between data elements	<p>Strike price, contract type / UPI</p> <p>If the strike price is null, then the strike price notation is null.</p>

**Q8: With reference to data elements “strike price” and “strike price notation” (Sections 2.21 and 2.22), is the proposed format length for “strike price” (Num(18,13)) sufficiently big for strike prices denominated in any currency? If not, what would be an appropriate format length, both for characters before the decimal point and characters after the decimal point?**

## 2.23 Option lockout period

Definition	The date at which an option can first be exercised.
Existing industry standard	ISO 8601/UTC
Format	YYYY-MM-DD
Allowable values	Any valid date formatted as described above and falling on or after the effective date. Null in case it is not an option or there is no lockout period (as in American-style options).
Related data elements/ dependencies between data elements	Effective date (batch 1), end date (batch 1) Lockout period should not be earlier than the effective date, or later than the end date.

## 2.24 Option premium

Definition	The amount of money paid by an option buyer to the seller of the option. This definition covers options on all asset classes, including swaptions.
Existing industry standard	Not available
Format	Num(25,5)
Allowable values	Any strictly positive number (eg excluding zero). Null if it is not an option.
Related data elements/ dependencies between data elements	Option premium currency, contract type / UPI

## 2.25 Option premium currency

Definition	The currency of the option premium exchanged.
Existing industry standard	ISO 4217
Format	Char(3)
Allowable values	Currencies included in ISO 4217 and CNH. Null if it is not an option.
Related data elements/ dependencies between data elements	Option premium, contract type / UPI

**Q9: With reference to data elements "option premium" and "option premium currency" (Sections 2.24 and 2.25), should an option premium payment date be added, to take into account that the option premium may sometimes be paid at the end of the transaction?**

## 2.26 CDS index attachment point

Definition	A defined point at which the level of losses in the underlying portfolio reduces the notional of a tranche. For example, the notional in a tranche with an attachment point of 3% will be reduced after 3% of losses in the portfolio have occurred.
Existing industry standard	ISO 20022: Tranche/AttachmentPoint
Format	Num(11,10)
Allowable values	<ul style="list-style-type: none"><li>• The value must be between 0 and 1 (including 0 and 1) and is represented as a decimal (eg 0.05 instead of 5%).</li><li>• Null if it is not a single-security CDS.</li></ul>
Related data elements/dependencies between data elements	CDS index detachment point, contract type / UPI

## 2.27 CDS index detachment point

Definition	The detachment point defines the point beyond which losses in the underlying portfolio no longer reduce the notional of a tranche. For example, the notional in a tranche with an attachment point of 3% and a detachment point of 6% will be reduced after there has been 3% of losses in the portfolio. 6% losses in the portfolio deplete the notional of the tranche.
Existing industry standard	ISO 20022: Tranche/DetachmentPoint
Format	Num(11,10)
Allowable values	<ul style="list-style-type: none"><li>• The value must be between 0 and 1 and is represented as a decimal (e.g. 0.05 instead of 5%).</li><li>• Null if it is not a single-security CDS.</li></ul>
Related data elements/ dependencies between data elements	CDS index attachment point, contract type / UPI

## Annex 1

Table 1: Overview of the batch 2 critical data elements and their grouping

Section	Name	Name string	Group name
2.1	Reporting timestamp	REP_DATETIME	Dates and Times
2.2	Execution timestamp	EXEC_DATETIME	Dates and Times
2.3	Final settlement date	SETL_DATETIME	Dates and Times
2.4	Settlement currency	SETL_CUR	Settlement / Post-trade
2.5	Confirmed	CONFMD	Settlement / Post-trade
2.6	Day count convention	DAY_CNT_CONV	Cash flows
2.7	Payment frequency period	PAYMENT_FREQ_PERIOD	Cash flows
2.8	Payment frequency period multiplier	PAY_FREQ_PERIOD_MULT	Cash flows
2.9	Counterparty 1 (reporting counterparty)	CPID1	Identifiers
2.10	Counterparty 1 type	CPID1_TYPE	Identifiers
2.11	Counterparty 2	CPID2	Identifiers
2.12	Counterparty 2 type	CPID2_TYPE	Identifiers
2.13	Report-submitting entity	REPID	Identifiers
2.14	Broker of counterparty 1	BROKERID1	Identifiers
2.15	Central counterparty	CCPID	Identifiers
2.16	Clearing member	CMID	Identifiers
2.17	Platform identifier	PLATID	Identifiers
2.18	Inter-affiliate	INTER_AFFILIATE	Identifiers
2.19	Booking location of counterparty 1	LOCATION_CP1	Identifiers
2.20	Location of counterparty 1's trading desk	TRADE_DESK_LOCATION_CP1	Identifiers
2.21	Strike price	STRIKE_PRICE	Options
2.22	Strike price notation	STRIKE_PRICE_NOTATION	Options
2.23	Option lockout period	LOCKOUT	Options
2.24	Option premium	OPTION_PREMIUM	Cash flows
2.25	Option premium currency	OPTION_PREMIUM_CURR	Cash flows
2.26	CDS index attachment point	CDS_INDEX_ATTACH_POINT	Attachment / Detachment
2.27	CDS index detachment point	CDS_INDEX_DETACH_POINT	Attachment / Detachment

**Table 2: Data elements supporting authorities' functional mandates: examples**

This table lists all data elements (column 2) and provides for each element at least one example of an authority's functional mandate (column 3), for which this particular data element is key. In addition, a more detailed explanation of how each data element supports the fulfilment of the listed mandate is provided (column 4). The authorities' functional mandates in column 3 are drawn from the list of mandates identified already in the 2012 CPSS-IOSCO Data Report.

Section	Data element name	Examples of authorities' functional mandates (from the Access Report)	Explanations of data elements' relationships to authorities' functional mandates
2.1	Reporting timestamp	Supervising market participants	"Reporting timestamp" helps authorities to evaluate market participants' compliance with business conduct and other regulatory requirements, and more specifically, the timeliness of trade reporting. For example, the difference between the execution timestamp and reporting timestamp will enable authorities to evaluate whether market participants are reporting within the required time frames.
2.2	Execution timestamp	Conducting market surveillance and enforcement	A harmonised "execution timestamp" would allow authorities to more precisely sequence transactions, enabling them to monitor market activity for anomalous trading activity, including market and price manipulation, insider trading, market rigging, front-running and other deceptive or manipulative conduct. For example, detection of wash trades or insider trading will typically require an execution timestamp.
<ul style="list-style-type: none"> <li>• 2.3</li> <li>• 2.4</li> <li>• 2.5</li> <li>• 2.6</li> </ul>	<ul style="list-style-type: none"> <li>• Final settlement date</li> <li>• Settlement currency</li> <li>• Confirmed Day count convention</li> </ul>	Assessing systemic risk; regulating, supervising or overseeing trading venues and financial market infrastructures; supervising market participants	These data elements are crucial for evaluating market activity including timely estimates of exposure analyses (per region, currency, dates), location and status of trades through life cycle events, and match-off against collateral and margins. These allow regulators to assess settlement risk related to OTC derivatives and, more specifically, whether the actual transfer of cash or the underlying asset has been completed. A "confirmed" flag, for example, would enable authorities to determine and document the legal obligations of an entity, which is in turn important eg for supervision of market participants and assessment of systemic risk.

<ul style="list-style-type: none"> <li>• 2.7</li> <li>• 2.8</li> </ul>	<ul style="list-style-type: none"> <li>• Payment frequency period</li> <li>• Payment frequency period multiplier</li> </ul>	Assessing systemic risk; supervising market participants	These data elements provide information about the frequency of cash flows associated with OTC derivatives contracts. Hence, similar to the day count convention, these data elements are important for determining exposures, which in turn facilitates the assessment of systemic risk and supervision of market participants.
<ul style="list-style-type: none"> <li>• 2.9</li> <li>• 2.10</li> <li>• 2.11</li> <li>• 2.12</li> </ul>	<ul style="list-style-type: none"> <li>• Counterparty 1 (reporting counterparty)</li> <li>• Counterparty 1 type</li> <li>• Counterparty 2</li> <li>• Counterparty 2 type</li> </ul>	Assessing systemic risk; supervising market participants	"Counterparty 1", "counterparty 2" and related data elements enable the identification of parties that are exposed to OTC derivatives contracts. This information supports supervision of market participants and assessment of systemic risk because it enables aggregation of OTC derivatives exposures for these parties, which in turn supports the monitoring of size, concentration and interconnectedness.
2.13	Report-submitting entity	Conducting market surveillance and enforcement; supervising market participants	A harmonised representation of the entity submitting a report would allow authorities to more easily identify the entity, in addition to the reporting counterparty, to which they could address questions about the submitted report.
2.14	Broker of counterparty 1	Conducting market surveillance and enforcement	The "broker of counterparty 1" and related data elements enable identification of transactions that are intermediated by a particular broker. Information about the activity of a particular broker may be important for the detection of market abuse, and a standardised identifier for brokers may allow authorities to consistently observe the activity of a broker that spans multiple jurisdictions.
2.15	Central counterparty	Assessing systemic risk; performing general macro assessment; conducting market surveillance and enforcement	The ability to consistently identify the CCP involved in transactions submitted to multiple TRs would facilitate analysis of the risks contained within CCPs. Aggregation of TR data along a CCP identifier would also allow analysis of the use of central clearing by market participants, and facilitate national authorities' assessment of compliance with central clearing mandates.

2.16	Clearing member	Assessing systemic risk; general macro assessment	A harmonised clearing member identifier would facilitate aggregation of CCP exposures to clearing members, allowing national authorities to develop an understanding of which clearing members represent the largest conduits for risk transmission. Further, aggregation of transactions by clearing member could help authorities identify how indirect clearing members allocate their business across clearing members.
2.17	Platform identifier	Conducting market surveillance and enforcement; performing general macro assessment; supervising market participants	Aggregating data along a platform identifier would allow national authorities to identify activity at a platform and compare similar activity across multiple platforms. This could facilitate monitoring of compliance with regulatory requirements applied to platforms. The ability to identify platforms associated with transaction activity would also allow for monitoring of trends in the use of platforms as well as compliance with trade execution requirements.
2.18	Inter-affiliate	Performing general macro assessment; supervising market participants	Consistent identification of inter-affiliate transactions would facilitate interpretation of information aggregated within and across TRs. In particular, knowledge that a transaction involved affiliated entities could change the way in which national authorities interpret transaction prices.
<ul style="list-style-type: none"> <li>• 2.19</li> <li>• 2.20</li> </ul>	<ul style="list-style-type: none"> <li>• Booking location of counterparty 1</li> <li>• Location of counterparty 1's trading desk</li> </ul>	Assessing systemic risk; performing general macro assessment; supervising market participants	Harmonised location information could be used by national authorities to develop an understanding of general industry trends such as which financial centres specialise in particular asset classes over time. Harmonised location information could also provide information about changing business practices in OTC derivatives markets including the extent to which the geographic distribution of trade execution differs from the geographical distribution of financial risk that arises from these activities. Finally, harmonised location information can facilitate enforcement of regulations that are tied to the location where OTC derivatives-related activities take place. Identifying the location where a trade is executed will also allow systemic risk analysis of the size and type of exposures to counterparties' books. Understanding the location of where trades are executed allows analysis of concentrations in trading activity, and allows regulators to monitor market conduct and detect irregular activities.

<ul style="list-style-type: none"> <li>• 2.21</li> <li>• 2.22</li> <li>• 2.23</li> </ul>	<ul style="list-style-type: none"> <li>• Strike price</li> <li>• Strike price notation</li> <li>• Option lockout period</li> </ul>	Assessing systemic risk	<p>These three data elements are basic terms of options contracts, and are therefore vital to understanding the direction, time frames and extent of counterparties' exposures to the underlying assets of option contracts. These data elements would generally allow authorities to monitor the OTC options markets using data aggregated across TRs. More specifically, authorities would be able to use TR data to examine the size, concentration, interconnectedness and structure of option markets.</p>
<ul style="list-style-type: none"> <li>• 2.24</li> <li>• 2.25</li> </ul>	<ul style="list-style-type: none"> <li>• Option premium</li> <li>• Option premium currency</li> </ul>	Supervising market participants; regulating, supervising or overseeing trading venues and financial market infrastructures	<p>The option premium data elements are important for understanding the pricing of options and comparing the prices of similar options traded in different markets, and thus allow authorities to supervise market participants and trading venues. More specifically, authorities would be able to evaluate whether transactions are executed near fair value and to assess the liquidity of option markets.</p>
<ul style="list-style-type: none"> <li>• 2.26</li> <li>• 2.27</li> </ul>	<ul style="list-style-type: none"> <li>• CDS index attachment point</li> <li>• CDS index detachment point</li> </ul>	Assessing systemic risk; supervising market participants	<p>The "CDS index attachment point" and "CDS index detachment point" data elements are vital to evaluating counterparties' exposures to CDS index tranches and thus allow authorities to examine the size, concentration, interconnectedness and structure of CDS index tranche markets. In addition, the data elements allow authorities to more closely supervise market participants.</p>

Table 3: Format details

Format <sup>15</sup>	Content in brief	Additional explanation	Example(s)
YYYY-MM-DD	Date	YYYY = four-digit year MM = two-digit month DD = two-digit day	2015-07-06 (corresponds to 6 July 2015)
YYYY-MM-DDThh:mm:ssZ	Date and time	YYYY, MM, DD as above hh = two-digit hour (00 through 23) (am/pm NOT allowed) mm = two-digit minute (00 through 59) ss = two-digit second (00 through 59) T is fixed and indicates the beginning of the time element. Z is fixed and indicates that times are expressed in UTC (Coordinated Universal Time) and not in local time.	2014-11-05T13:15:30Z (corresponds to 5 November 2014, 1:15:30 pm, Coordinated Universal time, or 5 November 2014, 8:15:30 am US Eastern Standard Time)
Num(25,5)	Up to 25 numerical characters including up to five decimal places	The length is not fixed but limited to 20 numerical characters before the decimal point including up to five numerical characters after the decimal point.	1352.67 12345678901234567890.12345 0 – 20000.25 – 0.257
Char(3)	Three alphanumeric characters	The length is fixed at three alphanumeric characters.	USD X1X 999
Varchar(25)	Up to 25 alphanumeric characters	The length is not fixed but limited up to 25 alphanumeric characters.	asgaGEH3268EFdsagtTRCF543 aaaaaaaaa x

<sup>15</sup> The numbers given in the formats Num(25,5), Char(3) and Varchar(25) are only examples; analogous formats (with different numbers of characters) can be generated using the same logic.

## Annex 2: Working group participants

This report was produced for the CPMI and IOSCO by the Working Group for the harmonisation of key OTC derivatives data elements (Harmonisation Group).

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European Central Bank  
  
John Rogers  
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### **Vice-chairs:**

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### **Members:**

Canada

Steve Badra-Quirion  
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Shaun Olson  
Ontario Securities Commission  
  
Yani Wu  
Ontario Securities Commission

China

Haibo Cheng (until May 2016)  
China Securities Regulatory Commission  
  
Hailong Li (since May 2016)  
China Securities Regulatory Commission

France

Franck Lasry  
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United Kingdom	Michael Yoganayagam Bank of England  John Tanner Bank of England
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<b>Secretariats:</b>	
Committee on Payments and Market Infrastructures	Cristina Picillo Philippe Troussard
International Organization of Securities Commissions	Verinder Sharma