

30 September 2015

Mr. Verinder Sharma
General Secretariat
International Organization of Securities Commissions (IOSCO)
Calle Oquendo 12
28006 Madrid
Spain

Re: ICE Trade Vault Europe Limited's and ICE Trade Vault, LLC's response to the Harmonisation of the Unique Transaction Identifier Consultative Report Issued by CPMI-IOSCO

Dear Mr. Sharma,

ICE Trade Vault Europe Limited and ICE Trade Vault, LLC ("ICE Trade Vault") welcomes the opportunity to comment on the consultative report on the Harmonisation of the Unique Transaction Identifier ("UTI") issued by the Committee on Payments and Market Infrastructures ("CPMI") and the International Organization of Securities Commission ("IOSCO"). As background, Intercontinental Exchange, Inc. ("ICE") was established in 2000 as an over-the-counter ("OTC") marketplace with the goal of providing transparency and impartiality for the previously opaque, fragmented energy market. Since that time, ICE has grown significantly through organic growth fostered by product, technology and clearing innovation, and by acquisition of futures and equities exchanges that have broadened its product offerings and risk management services. As part of this growth, ICE established ICE Trade Vault, LLC, the first provisionally registered Swap Data Repository ("SDR") in the United States who is dually registered in Canada, as well as ICE Trade Vault Europe Limited, a registered Trade Repository ("TR") and Registered Reporting Mechanism ("RRM").

ICE Trade Vault would like to praise the CPMI-IOSCO and the Bank for International Settlements ("BIS") for this initiative to develop global standards for UTIs in OTC derivative transactions. Moreover ICE is looking forward to the technical guidance from authorities on the definitions of key data elements other than UTIs and Unique Product Identifiers ("UPIs"). In order to contribute to this initiative and provide helpful feedback on the UTI consultation, below please find answers to the Consultative Report's specific questions. The report questions are reprinted in italics below, with ICE Trade Vault's response immediately following.

- 1. Are there jurisdictional differences about what is a reportable transaction that respondents believe will cause challenges for UTI generation? Please describe the differences and challenges.*

ICE Trade Vault Response: Yes, while the G20 originally sought consistent reporting globally, different models for reporting have emerged over the years. For example, the model for reporting in the European Union ("EU") pursuant to the European Market Infrastructure Regulation ("EMIR") requires that the clearing member to client leg of a cleared trade be reported separately from the clearing member to clearing house leg. Comparatively, in the US under the Commodities Futures Trading Commission ("CFTC") reporting rules, only a single trade is reported regardless of the clearing model. This difference between EMIR and US data reporting rules causes the same trade to be reported with two UTIs in Europe and only one UTI in US. This end result hinders global regulators' ability to identify the transaction under a single UTI. To alleviate this situation for cleared transactions, the clearinghouse

(“CCP”) should solely be responsible for generating the UTI and reporting on behalf of its Clearing Members and the Clearing members Clients. Other examples include CFTC requirements where a trade not executed on a SEF or DCM but reported by a Foreign SD must have the namespace of that SD, but if that SD executes a trade on an OMP, per REMIT regulations, the OMP must generate the UTI.

2. *Are there further harmonisations (that could potentially be applied) to the rules that define which transactions are reportable that would reduce or eliminate the challenges around generating UTIs? In answering this question please also describe the challenge(s) and identify the jurisdiction(s).*

ICE Trade Vault Response: Entities that are best positioned to generate and disseminate UTIs and fulfill the reporting obligations should be responsible for these duties. As such, CCPs should solely discharge these duties for cleared transactions. As CCPs should be tasked with the reporting of cleared transactions, the UTI should be disseminated via the CCPs end of day clearing feeds. For trades executed on an organized market, the exchange should be the UTI generator, disseminator and trade reporter. Execution venues should add the UTI to their trade capture APIs and end of day trade reports. For non-cleared, off facility transactions, the financial institution that is a party to the transaction should generate and disseminate the UTI and subsequently report the trade. The UTI should be created and or disseminated via the confirmation process, preferably via electronic confirmation platforms. A standard approach to UTI generation and dissemination is essential to avoid confusion and duplication of UTIs.

3. *Do respondents agree with the proposed approach to UTI allocation for package transactions? Under what circumstances should the entire package have a single UTI?*

ICE Trade Vault Response: No, package transactions normally involve different products. Exchanges and clearinghouses decompose package transactions into individual transaction legs. As such, package transactions should continue to be reported with unique UTIs on the individual legs to enable exchange and clearinghouses to continue processing these transactions. It is feasible to link individual trade legs with a single identifier (e.g., Package Linkage ID) that traces back to the package transaction. This mechanism of reporting package transactions therefore requires one identifier to identify the package transaction and UTIs for each transaction leg.

4. *Are there other approaches to UTI allocation for package transactions that should be considered? If so, please describe.*

ICE Trade Vault Response: Yes, please reference answer to question 3 above.

5. *Which if any, of the options for identifying and linking components of packages do you favour and why? In particular, please consider the extent to which the options achieve traceability?*

ICE Trade Vault Response: Please see answer to question 3 above. This method allows traceability while still being technologically practicable and is not cost prohibitive.

6. *Do you see any difficulties in implementing any of the proposed options for identifying and linking components of packages? If so, please describe*

ICE Trade Vault Response: Yes, package transactions are normally on different products (e.g. different UPIs) and are stored and processed by exchanges and clearinghouses as separate legs and as such should continue to be reported with UTIs for individual legs.

7. *Please identify and describe any alternative approaches for identifying and linking components of packages that should be considered, focusing in particular on any impact they would have on UTI generation.*

ICE Trade Vault Response: Yes, please reference the answer to question 3 above.

8. *Is the proposed division between events that should and should not require a new UTI complete and correct (please refer to the proposal described in this section and the table in Section 8)? If not, please provide other cases and explain why they should not lead to a new UTI being required.*

ICE Trade Vault Response: ICE Trade Vault recommends that CPMI-IOSCO add the 'option exercise' lifecycle event to the table in Section 8. The resulting transaction for this event should create a new UTI. Additionally, a legal name change that may or may not update the LEI, should not generate a UTI as the trade was pre-existing. TRs should have simple functionality to update records with the correct LEI without generating new and redundant UTIs. Similarly, previously reported trades should not be given new UTIs if the counterparties to the transaction upgrade an internal/client code identifier to an LEI. If a trade is misreported with an incorrect LEI by the UTI generating entity; a new UTI should not be generated as the trade may already be past the process where the generation occurs (e.g., execution facility)

9. *Different jurisdictions may have different rules (including case law) defining which events would require a new UTI to be created. Are respondents aware of any such differences? What difficulties do these differences create in the creation of UTIs? If jurisdictions' approaches to when a new UTI is required cannot be harmonized, are there other steps that could be taken to avoid double-counting of transactions reported to different TRs?*

ICE Trade Vault Response: Yes, different jurisdictions employ different rules relating to events that require new UTIs. Since reporting rules across jurisdictions are different, counterparties may be required to create multiple UTIs on a single trade which hinders regulators' ability to understand the data and for counterparties to manage multijurisdictional transactions. For example, the European Securities and Markets Authority ("ESMA") does not allow a UTI edit on a transaction submitted in error or counterparty name changes. These prohibitions create a burden on counterparties because most counterparties' systems employ only one method for capturing and creating UTIs. Conversely, the CFTC does allow counterparties to update LEIs without changing the UTI and therefore a trade that is dually reportable in the US and the EU may have different UTIs for the same trade.

10. *Do respondents agree with the analysis of linking related transactions through lifecycle events?*

ICE Trade Vault Response: ICE Trade Vault agrees that with the approach to add prior and successor UTIs to one-to-one and one-to-many lifecycle events. However, these fields need to be added to the current reporting regimes as these fields do not exist today. For many-to-many new fields, pre-bulk event ID, and post-bulk event ID fields need to be added to link all trades in a many-to-many events together (e.g. compression events where a set of trades are compressed into a smaller set of resulting trades, but are not netted down into a single position), having both a pre

and post-bulk event identifier will verify the bulk event ID is not overwritten when a trade that is a result of a compression event is then involved in a second compression event.

11. Are there other cases to be considered in the analysis of linking related transactions through lifecycle events?

ICE Trade Vault Response: No, ICE Trade Vault does not believe there are other cases to be considered in the analysis of linking related transactions through lifecycle events.

12. Are there practical difficulties that would arise from putting a successor UTI on a transaction that had been terminated? Such difficulties could arise in the reporting, the processing by the TR or the analysis by the authorities.). If a new swap results from the termination of an existing swap it should be the swap to link the transactions via provided the Prior-UTI.

ICE Trade Vault Response: A successor UTI on a transaction that has been terminated is not necessary as long as the UTI is included in the cancel/termination event message. Terminated trades are not open and therefore are not regularly modified (with the rare exception of an incorrect cancellation). If the terminated trade is linked to a new transaction that new trade should preference the Previous-UTI of the terminated transaction. The new transaction may have a new reporting counterparty and UTI creator, as such they should not have the update the previous trade that may not be in a TR they are connected to with the successor UTI.

13. Can respondents suggest other ways of achieving links between reports subject to lifecycle events that meet the characteristics to provide an audit trail?

ICE Trade Vault Response: ICE Trade Vault has no further recommendations as to other ways of achieving links between reports subject to lifecycle events at this time.

14. Which of the proposed solutions to linking reports subject to lifecycle events do you favour? Do you see any difficulties in implementing any of the proposed solutions, and if so what are they?

ICE Trade Vault Response: Please see response to question 10 above.

15. Can respondents suggest UTI constructs that would achieve embedding the link information about lifecycle events into the UTI while still compliant with the authorities' desired characteristics

ICE Trade Vault Response: Embedding trade data into a UTI necessarily makes that UTI unique. Accordingly, ICE Trade Vault recommends the two approaches described in our response to question 21 and 30 below.

16. Are there additional issues that should be taken into account in considering the responsibility for generating UTI?

ICE Trade Vault Response: Please see response to question 2 above.

17. Would it be beneficial if the guidance did not provide for the harmonisation of rules for the responsibility for UTI generation with respect to trades that are not cross-border? Would there be disadvantages to this approach? Does the analysis of this idea depend on which option is used for cross-border trades?

ICE Trade Vault Response: The generation and dissemination of UTIs should be simple and streamlined to create efficient reporting in all cases and this can be achieved by having a globally consistent approach. These principles should be uniformly applied to single and multijurisdictional transactions.

18. Do respondents agree with the high-level assessment of the Option 1 proposal for the responsibility for generating UTIs? Please explain why or why not.

ICE Trade Vault Response: Yes, ICE Trade Vault generally agrees with the high-level assessment of the Option 1 proposal, but further recommends the definition of a granular and detailed approach. Please see our response to question 21 below.

19. Are there additional considerations relevant to the Option 1 proposal for the responsibility for generating UTIs? If so please describe.

ICE Trade Vault Response: Please reference response to question 21 below.

20. Is a problem of enforceability created if the UTI was generated by an entity outside the jurisdiction of one of the counterparties?

ICE Trade Vault Response: Please see response to question 21 below. Any approach to UTI generation and dissemination by the authorities should account for multijurisdictional trades and the respective reporting timelines.

21. What are respondents' views on the proposed Option 1 hierarchy for the responsibility for generating UTIs? Are the steps necessary and sufficient? Are they sufficiently defined? Are there alternative ways of achieving Step 6?

ICE Trade Vault Response: ICE Trade Vault recommends two distinct approaches for UTI generation. The first and preferred approach, is for globally consistent UTI generation ("TV UTI Creator Approach 1"). This approach is dependent on the harmonisation of the current UTI generation rules across jurisdictions to simplify and streamline the generation and dissemination of UTIs on a global basis. Below please find a chart representing how the TV UTI Creator Approach 1 operates:

UTI Creator Approach 1			
Step	Trade Execution/Status	Generating entity	Dissemination
1.	The derivative contract is executed on an organised trading platform (e.g., SEF, DCM, MTF, OMP, or Exchange).	The organised trading platform.	Trade Capture APIs and Trade Reports

2.	The derivative contract is cleared by a CCP.	The CCP should assign UTIs for any cleared derivatives transactions that result from the clearing process. Note: ESMA rules ideally would be amended for the CCP to report all trades in a single record vs. four records. If not, then the Clearing Member should generate the Clearing Member to Client leg.	As CCP is the reporting entity, UTIs should be provided on the End of Day reports.
3.	The trade is bilateral, executed off platform and the counterparties have an agreement on who has the responsibility for generating the UTI.	The counterparties may have an agreement in place allocating responsibility for generating the UTI before executing a trade. If so, that entity is the UTI creator and is responsible for generating the UTI within the timeframe required by the earliest reporting time jurisdiction. Note: This meets the need of commodities non-dealers to determine the creator whereas in a sell side approach, a small utility may get tasked with generating the UTI.	A trade confirmation platform may generate the UTI based on the UTI creator's LEI if the UTI creator so delegates to them. The parties to the trade must inform the confirmation platform of the creator either via an initial set up or on a trade by trade basis. Or the UTI creator may generate and provide the UTI, including UTIs for allocations, via a Trade Confirmation Platform or via their current confirmation process but it must be communicated in the shortest jurisdiction's timeframe.
4.	The trade is bilateral, executed off platform and the entities do not have an agreement to who creates the UTI.	The seller is the UTI creator. Standard rules per asset class should be used to define the seller including standard product classifications as on a fixed for float swap the buyer pays fixed and seller pays float.	See 3 (Dissemination)

The second approach assumes that current and future regulations cannot be changed ("TV UTI Creator Approach 2").¹ This flow is the most currently implemented approach today. The first implemented jurisdiction or the jurisdiction with the shortest timeframes must be included as a factor in the hierarchy.

UTI Creator Approach 2		
Step	Question	Generating entity
1.	Was the derivative contract executed on an organised trading platform (e.g., SEF, DCM, MTF, OMP, or Exchange)?	The organised trading platform.
2.	Is the derivative contract cleared by a CCP?	The CCP assign UTIs for any OTC derivatives transactions that result from the clearing process.
3.	Is the derivative contract the Clearing Member to Client leg in a 4 leg reporting model?	The Clearing Member generates the Clearing Member to Client leg UTI.
4.	Is the trade US Reportable?	Is the reporting entity a SD or MSP? US Reporting entity creates the UTI with their namespace. Is the reporting entity a Non-SD/MSP? SDR create with their namespace.
5.	Is the trade EMIR Reportable and not reportable in an above jurisdiction?	If the parties have a predetermined agreement of who generates the UTI, that party generates the UTI. Otherwise, if one party is a financial entity, they generate. If neither party is a financial entity but one party is above the clearing threshold they generate. Otherwise, Seller generates. UTI creator uses their LEI for the prefix.

¹ For trades reportable pursuant to the current CFTC regulations, there is still an issue of the use of namespace instead of LEI prefix, this will still create uniqueness but complicates simple approach.

6.	Is the trade Canadian Reportable and not reportable in an above jurisdiction?	If only one party is a Derivatives Dealer, they generate the UTI. If parties are of equal designation and they have an agreement as to who reports or generates the UTI then that party generates the UTI. Otherwise, seller generates.
7.	Is the trade reportable under any other jurisdiction and not reportable in an above jurisdiction?	Jurisdiction reporter should follow implementation date then determine the creator: If the jurisdiction is single sided then the reporter generates, if the jurisdiction is dual sided then if the parties have an agreement to who generates then that agreement is used, otherwise if there is a jurisdiction hierarchy it is used, otherwise seller generates.

22. *Is it desirable to include the sort of flexibility represented by Steps 1–5? If so, where in the hierarchy should the flexibility be provided (eg as the first step in the hierarchy or further down the waterfall)?*

ICE Trade Vault Response: Flexibility in the UTI generation approach is acceptable as long as the flexibility is clearly and consistently applied.

23. *Can respondents provide an alternative set of UTI generation steps for the proposed Option 1 hierarchy for the responsibility for generating UTIs that meet all of the characteristics set out in Section 2?*

ICE Trade Vault Response: In order to meet the characteristics in Section 2, the CFTC would need to amend the SDR rules. At a minimum, all UTIs should have a 20-character prefix equivalent to the generator's LEI and the Globally Unique Identifier ("GUID") should be used for the remaining 32 characters. Additionally, the CFTC would need to replace their namespace requirement with the LEI of the reporting counterparty prefix requirement. Finally, the CFTC should revisit its rules that require SDRs to generate UTIs for non-SD/MSPs with the SDR's namespace. Instead, SDRs should offer a service that generates UTIs that includes the reporting counterparty's LEI prefix.

24. *Does the proposed Option 1 hierarchy for the responsibility for generating UTIs work across different reporting jurisdictions, particularly considering differences such as single-sided and double-sided reporting?*

ICE Trade Vault Response: Please reference response to question 23 above.

25. *Do respondents agree with the high-level assessment of the Option 2 proposal for the responsibility for generating UTIs? Please explain why or why not.*

ICE Trade Vault Response: ICE Trade Vault does not agree with the high-level assessment of the Option 2 proposal for generating UTIs. CCPs and trading platforms should generate UTIs because these entities are best-positioned and most capable to generate and disseminate these identifiers.

26. *What are respondents' views on the feasibility of the Option 2 proposal to the responsibility for generating UTIs? Are there particular issues for respondents that operate in more than one jurisdiction? How serious is the possible ambiguity in Option 2 and are there efficient and suitable workarounds?*

ICE Trade Vault Response: Please reference response to question 21 for the preferred method of UTI generation and dissemination.

27. *Are there additional considerations relevant to the Option 2 proposal for the responsibility for generating UTIs? If so, please describe.*

ICE Trade Vault Response: Please reference response to question 21 for the preferred method of UTI generation and dissemination.

28. *Question 28: Is a problem of enforceability created if the UTI was generated by an entity outside the jurisdiction of one of the counterparties?*

ICE Trade Vault Response: Please reference response to question 21 for the preferred method of UTI generation and dissemination.

29. *What are respondents' views on the possible rules for the generation of UTIs that meet the compatibility approach of Option 2? Are there any additional rules that should be considered to meet the compatibility approach?*

ICE Trade Vault Response: Please reference response to question 21 for the preferred method of UTI generation and dissemination.

30. *Do respondents agree with the assessment of the Option 3 approach for the responsibility for generating UTIs?*

ICE Trade Vault Response: It is unlikely that a UTI structure can be put into place that will always generate unique identifiers by both sides independently. Presumably, if this was to work the execution time would be required, and it would be difficult if not technologically impossible for two counterparties executing an off facility swap to create the same execution time in their independent trade capture systems. ICE Trade Vault recommends the following UTI creation methodology: the first 20 characters of the UTI should equal the UTI creator's LEI, concatenated with a 32 character GUID. This is a simple approach for the UTI creator to consistently follow to ensure uniqueness. The UTI can be linked to the reporting entity, but any entity with access to the trade data including the trade parties, TR, and regulator would have access to this data anyways. The UTI should never be disclosed on public reports, which should always obfuscate the counterparties on trade level reports or be aggregate reports higher than the UTI level.

31. *Are there particular challenges for authorities in monitoring compliance with any of the options for the responsibility for generating UTIs?*

ICE Trade Vault Response: ICE Trade Vault cannot identify any particular challenges in this regard.

32. *Considering all three options presented for the responsibility for generating UTIs, do respondents see other suitable solutions meeting the characteristics set out in Section 2?*

ICE Trade Vault Response: Please reference response to question 30 above.

33. Which option for the responsibility for generating UTIs do you regard as preferable? Why is this? What would be the disadvantages to you if your non-preferred option was chosen?

ICE Trade Vault Response: Please reference response to question 30 and 21 above.

34. Is the assessment about timing for UTI generation correct? Are there examples of timing requirements from authorities that are incompatible with other elements of the proposed UTI generation approach? If so, please describe.

ICE Trade Vault Response: It is imperative that any global initiatives related to UTI generation are cognizant of the existing reporting timelines and any common standard should meet the most stringent reporting requirements as they exist today. Please see response to question 21 for dissemination suggestions.

35. Do respondents agree with the proposed overall approach to UTI structure and format? If not, please suggest alternatives that meet the characteristics?

ICE Trade Vault Response: Please reference response to question 30 above.

36. Which of these possible UTI components, if any, are important and why? Is it necessary for the UTI to have any of these components?

ICE Trade Vault Response: No comment.

37. Would it be useful or necessary to include check digit(s) in the UTI? Why?

ICE Trade Vault Response: No comment.

38. Which components, if any, should be included in the UTI? Which, if any, components should be used in UTI construction but not appear in the UTI? In answering this question, consider both the components listed in the table above or suggest other components as necessary. Please, explain how the particular components contribute towards meeting the characteristics set out in Section 2.

ICE Trade Vault Response: Please see response to question 30 above.

39. Should the UTI be solely a dummy code, ie a value that contains no embedded intelligence? Why or why not? Assuming that other data elements regarding a transaction (e.g. the identification of the counterparties, the date and time of execution etc) will be captured by the report to the TR, is it necessary to reflect such elements in the UTI?

ICE Trade Vault Response: Please see response to question 30 above.

40. Should the details of how to construct the ID value be defined and, if so, what approach (eg UUID) should be used?

ICE Trade Vault Response: Please see response to question 30 above.

41. *How important will it be to be able to distinguish “new” UTIs from “legacy” UTIs? Assuming that the trade report includes the date and time of execution, would it be necessary to embed the indication in the UTI itself or should the indication be explicit in a separate field?*

ICE Trade Vault Response: The creation date of the UTI should be implied by the reported date to the TR.

42. *Is it necessary or practical for the UTI to include a Mint component? If so, is the use of the LEI appropriate for the Mint component in the UTI? Are there other values that could be considered for this? What issues would arise in this case? How should cases where the Mint entity doesn’t have an LEI be handled?*

ICE Trade Vault Response: Please see response to question 30 above. Every entity that is responsible for generating UTIs should be required to have an LEI.

43. *What issues would arise from using the suffix UTI component to link the reports of components of a package?*

ICE Trade Vault Response: Please see response to question 3 above.

44. *Will including or not including certain components set out above in the UTI require changes to respondents’ systems or other systems on which you are dependent? How much change?*

ICE Trade Vault Response: No comment.

45. *Are there any issues in having an “intelligent” UTI? What are respondents’ views on the potential solutions to these issues? Are there alternative ways of dealing with this?*

ICE Trade Vault Response: Please see response to question 30 above.

46. *Can respondents suggest algorithms that would achieve the Option 3 approach to generating the UTI?*

ICE Trade Vault Response: Please see response to question 30 above.

47. *What are respondents’ views on the lengths of the various potential components of the UTI (assuming that they are included directly in the UTI) and hence the length of the overall UTI?*

ICE Trade Vault Response: Please see response to question 30 above.

48. *Should the UTI be case-sensitive (allowing for upper- and lower-case characters to be regarded as distinct)? Should the UTI avoid using certain alphanumeric characters that resemble others? For example, do you think it advisable for the UTI system to avoid using the digits “0” and “1” so as to avoid confusion with the letters “O” and “I” (or vice versa)?*

ICE Trade Vault Response: ICE Trade Vault recommends that UTIs should include numbers and upper case letters. From previous experience generating and accepting UTIs, companies do not take the case into account when generating and using UTIs and often submit the same UTI in varying cases (e.g., mixed vs. all lower or all upper). In order to better facilitate UTI duplication checks at TRs and simplify UTI creation, only upper case letters should be used. As far as the use of “0”, “O”, “1” and “I” currently LEIs use these characters and as such they should be allowed.

49. *Should other characters be allowed in the UTI beyond those proposed? If so, which ones and why do you recommend them? Could all jurisdictions and languages readily accommodate these characters?*

ICE Trade Vault Response: Please see response to question 48 and 23 above.

50. *Should separators between different component parts of the UTI be used? Why or why not? If so, which separators and why do you recommend them?*

ICE Trade Vault Response: No, please reference response to question 48 and 23 above.

51. *Should the length of UTI be of fixed or should only the maximum length be indicated?*

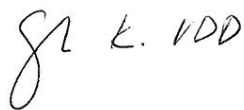
ICE Trade Vault Response: Please reference response to question 48 above which if followed will always create UTIs of the same length (assuming amendments to the CFTC's current rules).

52. *Do respondents agree with the proposed implementation approach? Is there a risk that a newly generated UTI would have the same value as an existing UTI as a result of these proposals? Is it possible to estimate the size of this risk? What problems do respondents see regarding "legacy" UTIs under this approach?*

ICE Trade Vault Response: ICE Trade Vault recommends that the implementation of a new UTI generation and dissemination regime include a significant amount of time for relevant stakeholders to absorb any changes. With ICE Trade Vault's suggested approaches, new UTIs should not conflict with existing UTIs.

ICE Trade Vault appreciates CPMI-IOSCO's and BIS' efforts in preparing this consultative report on the harmonization of UTIs. Should you have any questions about the contents of this letter, please do not hesitate to contact the undersigned.

Sincerely,



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