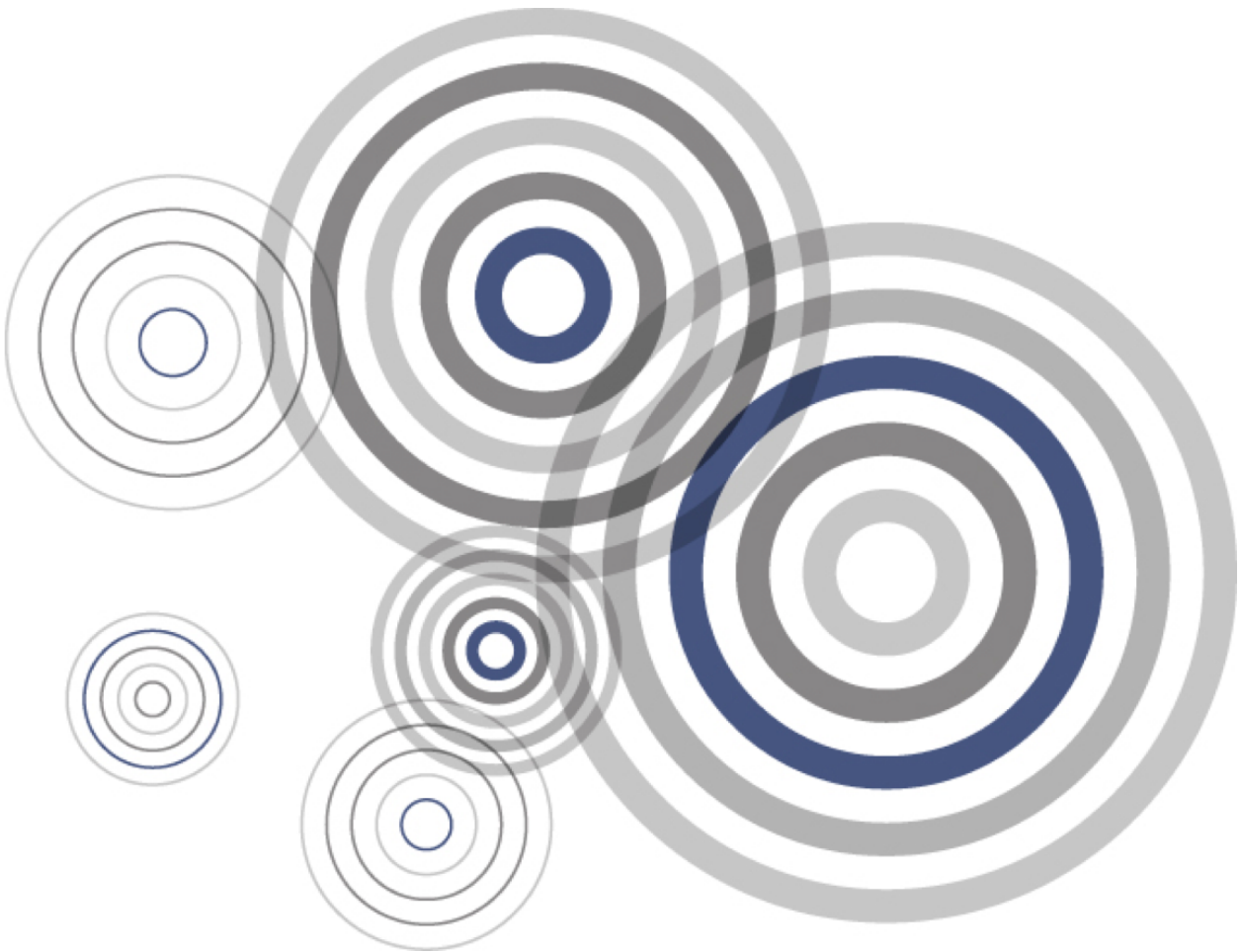


Public

Provisional Node Identifier (PNI) Code

DRAFT, V0.9 , 2016-09-27





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About this Document

This document describes a Provisional Node Identifier (PNI) code for use in referring to direct or ultimate accounting consolidating parent legal entities which must be reported under LEI-ROC policy but may not (yet) have an LEI.

The document forms the basis for consultation on this provisional code between GLEIF and LOUs.

Change History

Date	Version	Description of change	Author
2016-09-27	DRAFT	Version for consultation	GLEIF IT

1. Introduction

The Level 2 Data Project initially necessitates reporting of relationships of two types:

- Direct Accounting Consolidating Parent
- Ultimate Accounting Consolidating Parent

This reporting is mandatory for all “child” entities that have an LEI.

Some “parent” entities may not (yet) have an LEI.

These non-LEI parent entities will not be assigned any kind of LEI, but rather a provisional node identifier (so called because it identifies a non-LEI node in the graph data structure of the Relationship Record (RR-CDF format) data index).

The following technical implementation requirements lead to the implementation of a provisional identifier rather than e.g. embedding non-LEI parent metadata in the RR-CDF or LEI-CDF formats.

- Non-LEI parent data
 - must be kept distinct and separate from LEI-to-LEI relationship records, so it must contain an identifier to link it to the reporting child entity;
 - must contain an identifier that can be used in the RR-CDF format to report a set of RR-CDF files containing only non-LEI parent reports;
 - must be reported in a convenient format familiar to the LOUs;
 - could be used in future data publication and ideally leads to registration of full LEIs for all parent entities.
- The RR-CDF format and its management must preserve extensibility while remaining convenient for LOUs to use.
- The LEI-CDF format and its management would become extremely complex if it supported embedding a complete set of entity metadata within a child entity’s LEI record.

2. Code Structure and Description

- The PNI code is not an LEI. It is not possible to confuse the two different types as they are defined in two distinct, non-overlapping namespaces.
- The PNI code is a 20-digit alphanumeric code, compatible with the code construction rules in ISO 17442:
 - Characters 1-18 will comprise the digits 0-9 and upper-case letters A-Z:
 - Characters 1-4 are a four-character prefix unique to each LOU but not equal to any LEI issuing prefix assigned currently or in the past to any LOU (past or present);
 - Characters 5-18 are a code assigned to the non-LEI parent entity by the LOU which manages the child entity's LEI and reports this relationship;
 - Characters 19-20 are a check digit calculated as in ISO 17442 for LEIs.

Example:

12340000000000000026

The PNI creation prefixes used by LOUs will be issued by GLEIF, who will ensure that these do not equal any LEI issuing prefix (past, present or future) assigned by the LEI-ROC.

PLEASE NOTE:

The creation of PNIs according to the same technical specification as LEIs does not imply any other common features.

The PNI will not follow the other stipulations in ISO 17442, either in terms of

- reference data associated with the code

or

- validation and maintenance of any associated data.

As per the LEI-ROC policy on relationship data collection, a much simpler set of reference data and a lower standard of validation will apply to PNIs and non-LEI parent metadata.

3. PNI Implementation

GLEIF specifies a non-LEI parent data collection format based on the LEI-CDF in terms of data content, but with the following differences:

- The XML schema namespace and any elements that contain the word “LEI” in their LEI-CDF equivalent, e.g. the element `pni:PNI` which replaces `lei:LEI`, are unique to the PNI XML schema.
- The PNI data format XML schema **allows** all fields allowed by the LEI-CDF Version 1.0 but does not **require** any more than a minimal selection.
- As noted above, the LEI-CDF’s requirements for update, renewal and validation do not apply in full to PNI reference data.

Please see the separate document “Parent Entity Reporting Format” for details.