

GLEIF | St. Alban Vorstadt 5 | 4052 Basel | Switzerland

European Commission
Charlemagne building
Rue de la Loi 170
1040 Brussels
Belgium

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Contact Person
Stephan Wolf

Phone +41 61 50870 45
E-mail Stephan.Wolf@gleif.org

Frankfurt am Main
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Subject Global Legal Entity Identifier Foundation (GLEIF) response to review of the Directive on the re-use of public sector information (PSI Directive)

Dear Madam or Sir,

GLEIF would like to thank the EU Commission for the opportunity to provide comments on review of the Directive on the re-use of public sector information (PSI Directive).

GLEIF would like to elaborate on the topic presented in Question 5 in particular if the PSI Directive is well aligned and complementary to the rules based on other EU legal acts relevant to the area of re-use.

GLEIF is convinced that use of LEI across all EU legal acts and regulations as the key to identity and identification management would benefit the EU. The mandatory use of LEI set forth by legislative acts - in particular by MiFID II regulation - was deliberately enacted upon careful consideration and cost-benefit analyses of using LEI for conclusive identification. Consistent use of LEIs would improve both collection and distribution of information across organizations at the EU level, and especially in areas where information is collected and/or distributed between the EU level organizations and nationally with the Member States. This also would go a long way in achieving simplification as is outlined in the survey, simplifying implementation by the public sector bodies and re-users of public sector information.

GLEIF thinks though that the most effective and valuable leveraging of the LEI would be to align the CAB/Forum, eIDAS and other rule books with the LEI accreditation program for the issuance of digital certificates by a Public Key Infrastructures (PKIs) including the concept of certification authorities (CAs). As a result of the recent analysis, GLEIF is proposing that a partition of the ISO 17442 standard be created, to cover the inclusion of the LEI in digital certificates, the allocation and the validation rules as well as the related processes.

This would result in the rigorously validated, publicly available identification ID, based on a public good, within all digital certificates. Any digital certificate regulation should then mandate compliance with this.

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Kind regards,

Stephan Wolf
CEO GLEIF