

## Response of the Global Legal Entity Identifier Foundation (GLEIF) to the Securities and Exchange Commission on the Proposed Rule for Reporting Threshold for Institutional Investment Managers

September 2020

The Global Legal Entity Identifier Foundation (GLEIF) is pleased to provide comments to the Securities and Exchange Commission (“Commission”) on the Proposed Rule for Reporting Threshold for Institutional Investment Managers. GLEIF will focus its comments on the use of the Legal Entity Identifier (LEI) in the consultation.

First, GLEIF would like to respond to the Question 21. *“Should we require managers to provide their CRD number and SEC filing number, if any, on Form 13F?”*

Today, U.S. agencies and regulators use more than [50 various identifiers to track entities](#), of which the Central Registration Depository (CRD) and the Central Index Key (CIK) are 2 examples, both of which are open identifiers. The OPEN Government Data Act requires, among other items, that government agency data be open and shared with the public. As data becomes more open, the challenge of interoperability among agencies increasingly will become significant. Therefore, continuing to promote and require partitioned, albeit open identifiers, that provide isolated use cases is not sustainable in the long term. The LEI can harmonize disparate government data sets while co-existing with the current identifier schemes that are fit for purpose within individual agencies and regulators.

GLEIF would also like to highlight that consistent use of the LEI within and across Federal agencies is crucial for ensuring reporting consistency and requirements for reporting entities. In a previous Consultation released by the Commodity Futures Trading Commission (CFTC), the CFTC stated that the National Futures Association (NFA) Form Pool Quarterly Reports (PQR) may be revised to include questions regarding the LEI.

GLEIF would like to bring into the attention of Commission [an example](#) Form 13F report recently submitted by a reporting entity. Mandating the LEI for the reporting entity would make several data fields (e.g., company conformed name, state of incorporation, business address, mail address) unnecessary to report on the form. The SEC would benefit from the additional data contained in an LEI record, most notably the legal name, legal address, headquarter address, legal form and immediate and ultimate parent, among other information.

Lastly, GLEIF will be willing to work with the SEC in mapping existing identifier schemes, like the CIK to the LEI, if only for internal purposes initially. GLEIF also suggests the SEC reviewing our API. The GLEIF API gives developers access to the full LEI Data search engine functionality, including filters, full-text and single-field searches of legal entity and ownership data, and “fuzzy” matching of relevant data fields such as names and addresses. In addition to LEI reference data, the GLEIF API also makes available further related data, e. g. reference data of LEI issuers, code lists used in LEI records and mapped identifiers like BIC or ISIN codes.

GLEIF would also provide its comments for the Question 23. *“Would this additional identifying on Form 13F be useful information? If so, how?”*.

GLEIF believes that the growth of the LEI as a primary identifier continues to increase among financial institutions primarily through data vendors that provide financial content to these institutions. Similarly, Form 13F’s, among other SEC filings, often are processed by data vendors and information subsequently is fed to financial institutions that are following Form 13F quarterly disclosures. By including the LEI in the 13F, data vendors can more easily automate Form 13F processes and financial institutions will receive content quicker and more efficiently.

GLEIF would also like to respond to the Question 24 *“Would disclosing this information be unduly burdensome for 13F filers?”*

GLEIF does not think that disclosing the LEI would be unduly burdensome for 13F filers given investment advisors and asset managers are likely already to have an LEI due to existing regulations requiring the LEI in the U.S., most notably Dodd-Frank Wall Street Reform and Consumer Protection Act.