**Global Legal Entity
Identifier Foundation (GLEIF)**

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Mrs. Julie Green
U.S. General Services Adminstration
Washington, DC

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Basel
March 13, 2017

GLEIF response to the General Services Administration (GSA) Entity Validation Services Request for Information (RFI) #ID15170001

Dear Mrs. Green,

The Global Legal Entity Identifier Foundation (GLEIF) is pleased to provide you with its comments on the consultative document, entitled 'Entity Validation Services Request for Information (RFI) ' published by the General Services Administration in February 2017.

The Global Legal Entity Identifier Foundation (GLEIF) would like to thank the General Services Administration (GSA) for the opportunity to provide information on GLEIF's skill and capabilities in managing entity identification and validation services by responding to the Request for Information (RFI).

The development of a system to uniquely identify legal entities globally had its beginnings in the 2008 financial crisis. Regulators worldwide acknowledged their inability to identify parties to transactions across markets, products, and regions for regulatory reporting and supervision. This hindered the ability to evaluate systemic and emerging risk, to identify trends, and to take corrective steps. Recognizing this gap, authorities, working with the private sector, have developed the framework of a Global LEI System (GLEIS) that will, through the issuance of unique LEIs, unambiguously identify legal entities engaged in financial transactions. Although the initial introduction of the LEI was for financial regulatory purposes, the usefulness of the LEI can be leveraged for any purpose in identity management for legal entities both by the public and private sectors. This includes but is not limited to supply-chain, digital markets, trade finance, and many more.

The LEI initiative is driven by the Financial Stability Board (FSB) and the finance ministers and governors of central banks represented in the Group of Twenty (G20). In 2011, the G20 called on the FSB to take the lead in developing recommendations for a global LEI and a supporting governance structure. The related FSB recommendations endorsed by the G20 in 2012 led to the development of the Global LEI System that provides unique identification of legal entities participating in financial transactions across the globe and the subsequent establishment of the GLEIF by the FSB in 2014.

The GLEIF is overseen by a committee of global regulators known as the LEI Regulatory Oversight Committee (LEI ROC). Several US federal agencies are members of the LEI ROC including the Board of Governors of the Federal Reserve System (which currently chairs the LEI ROC), the Department of the US Treasury Office of Financial Research (OFR), the Securities and Exchange Commission, the Commodity Futures Trading Commission (CFTC), the Federal Deposit Insurance Corporation (FDIC),

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the Office of the Comptroller of the Currency (OCC) and the Consumer Financial Protection Board (CFPB).

The LEI itself is a 20-digit, alpha-numeric code based on the ISO 17442 standard developed by the International Organization for Standardization. It connects to key reference information that enables clear and unique identification of legal entities participating in financial transactions.

1. Does your company perform the Core, additional, Unique Assignment services, and/or other services? Describe your processes for each of the services for which you are providing a response.

LEI issuing organizations from the U.S. as well as from around the world are responsible for the issuance of LEI codes as well as the validation and periodic renewals of the underlying reference data, e.g. company names. GLEIF's role, under oversight of the LEI ROC, is to set technical, organizational and legal standards, the accreditation of LEI Issuers and checking the compliance of any issues with the policy and standards laid out, as well as several core monitoring functions, such as the systematic quality management reporting and providing the LEI Index and free-of-charge, free-of-barrier download capability of all LEIs and LREI reference data items.

The Global LEI System provides a unique environment for collaborative implementation of the specified entity validation services. For example, in the core service of issuing LEIs, the LEI issuing organizations ensure uniqueness of both the LEI code and the application of the LEI to the legal entity in the process of entity validation. GLEIF supports the LEI issuers by providing both a check for duplicates function that is leveraged at the time of LEI issuance and a global challenge service to facilitate entity updates. More detail on these two functions can be found in the response to question 2. GLEIF or any third party desiring to leverage the LEI and the Global LEI System can make use of this collaborative system to deliver the Core, additional, and Unique Assignment services specified in the RFI. Given the LEI is already a required identifier in reporting to several US regulators, this reduces duplication of efforts and therefore costs to US government agencies as a whole.

The [Master Agreement](#) is the contract that defines the rules and technical standards adhered to by the LEI ISSUERs and GLEIF, and is the framework governing the relationship between GLEIF and LEI issuing organizations. It also defines:
- The services provided by GLEIF to the LEI ISSUER or to the open public.
- The mandatory services provided by the LEI ISSUER to the Global LEI System.

The operational integrity of the Global LEI System is ensured through services provided by GLEIF such as the accreditation of LEI issuing organizations. In its role as accreditation agency, GLEIF evaluates the suitability of organizations issuing LEIs to legal entities engaging in financial transactions. Accreditation is a rigorous evaluation process carried out by GLEIF.

Candidate organizations must meet the requirements set out in the Master Agreement. GLEIF will verify annually whether organizations accredited to issue and maintain LEIs continue to meet the requirements with regard to service orientation and quality set out in the Master Agreement.

Implementation of the GLEIF accreditation program is the first of several GLEIF services launched to support its partners in the Global LEI System to optimize the quality, reliability and usability of LEI data.

GLEIF also has defined, in close dialog with the LEI Regulatory Oversight Committee and the LEI issuing organizations, a set of measurable quality criteria using standards developed by the International Organization for Standardization (ISO). These include criteria such as the completeness, comprehensiveness and integrity of the LEI data records. Instituting a set of defined quality criteria establishes a transparent and objective benchmark to assess the level of data quality within the Global LEI System. The GLEIF data quality program allows the quality of the LEI data pool (the publicly available information on legal entities identifiable with an LEI) to be monitored, assessed and further optimized. GLEIF publishes monthly data quality reports, which summarize the results of GLEIF's assessment of the level of data quality in the Global Legal Entity Identifier (LEI) System based on a set of clearly defined quality criteria (data rule settings) to achieve the overall data quality objective of trusted, open and reliable data.

For more information, the following links are provided:

LEI issuing organization
https://www.gleif.org/en/about-lei/how-to-get-an-lei-find-lei-issuing-organizations

Master Agreement and all appendices (provided under open data charter)
https://www.gleif.org/en/lei-system/gleif-accreditation-of-lei-Issuers/required-documents#

Global LEI data quality report
https://www.gleif.org/en/lei-data/gleif-data-quality-management/about-the-data-quality-reports/download-data-quality-reports/download-global-lei-data-quality-report-february-2017

2. Explain your method to determine that an entity is unique. Describe your process (flow).

GLEIF has implemented a 'check for duplicate' process to be used by our LEI issuer partners. LEI issuer partners use this process to insure that duplicate LEIs are not issued.

The LEI issuer checks prior to issuing the LEI in their validation process, that the LEI code is unique and that no other legal entity uses this LEI or that a legal entity has more than one LEI. The LEI ISSUER then uses the GLEIF facility with an automated algorithm to check for duplicates. If an LEI has been issued, any duplicates can be easily reported by using crowd sourcing and providing a Challenge facility that ensures a remediation within 10 business days.

1. "Check for duplicates"
   The LEI Issuers follow the required steps prior to assigning a valid LEI code to a Legal Entity. This includes a check for duplicates conducted locally by the LEI Issuer. Additionally, in order to support LEI Issuers, GLEIF provides a mandatory technical interface by which the LEI issuer checks the LEI and LE-RD data for duplicates entries. This comes with algorithms for the on-demand scoring of the likelihood of a duplication. The LEI issuer will then determine if further analysis is required. This 2-step check for duplicates is intended to ensure the lowest possible likelihood of a duplicate LEI being issued. Given a duplicate is issued, it remains in the public LEI data with a clear link to the Successor LEI. As such users of the LEI data are always able to identify uniquely the history of a legal entity.

2. "Challenge LEI Data"
   Each LEI issuer as well as GLEIF provides a challenge facility to trigger updates of Legal Entity Identifier (LEI) data to all interested parties. Specifically, the GLEIF utility offers a centralized, easy, convenient, and consistent means to trigger the verification and, where required, speedy update of LEI records including related reference data. The GLEIF data challenge facility provides any user of LEI data with the opportunity to substantiate doubts regarding the uniqueness of an LEI code, the referential integrity between LEI records, or the accuracy and completeness of the related reference data. It also allows the indication of possible duplicate entries or any lack of timely response to LEI related corporate actions. Once a challenge has been logged using the online form available on the GLEIF website, GLEIF immediately conveys the information to the relevant LEI issuing organization for follow-up. The LEI ISSUER ensures the adjustments are made, and uploads the adjusted LEI record to GLEIF.

All GLEIF services follow the ISO 20000 standard on service and process management. Documentation is available including flow charts, process and control descriptions and related documents. GLEIF seeks ISO 20000 certification by an external auditor by the end of 2018.

For more information, the following link is provided:

GLEIF's public challenge facility
https://www.gleif.org/en/lei-data/challenge-lei-data

3. What are the licensing restrictions on your services, technology, or data?

The data on GLEIF's website, e.g. LEIs and the Master Agreement, which is the contractual framework governing the relationship between GLEIF and LEI issuing organizations, is provided under a Creative Commons (CC0) license. Creative Commons is a nonprofit organization that enables the sharing and use of creativity and knowledge through free legal tools.

In January 2016, GLEIF formally endorsed the International Open Data Charter. The Charter defines open data as "digital data that is made available with the technical and legal characteristics necessary for it to be freely used, reused, and redistributed by anyone, anytime, anywhere".

The overarching goal of the International Open Data Charter is to foster greater coherence and collaboration to promote the increased adoption and implementation of shared open data principles, standards and good practice across sectors around the world.

Adherents to the Open Data Charter "agree to follow a set of six principles that will be the foundation for access to data and for the release and use of data". These principles mandate that data should be:

1. Open by default.
2. Timely and comprehensive.
3. Accessible and usable.
4. Comparable and interoperable.
5. For improved governance and citizen engagement.
6. For inclusive development and innovation.

GLEIF fully supports the Open Data Charter and is proud to commit to the six principles it mandates.

The LEI is free from limitations on use, proprietary licensing and redistribution.

For more information, the following links are provided:

Terms of Use
https://www.gleif.org/en/meta/lei-data-terms-of-use

Open Data Charter
https://www.gleif.org/en/newsroom/blog/global-legal-entity-identifier-foundation-endorses-the-new-international-open-data-charter

Barrier free download of data
https://www.gleif.org/en/lei-data/gleif-concatenated-file/download-the-concatenated-file

4. Do you have the capability to provide the government with information about individuals as well as entities? If so, please provide the data elements that are captured and explain how your process differs for each?

The LEI ROC is responsible for guiding the development of the Global LEI system (GLEIS). In this role, the LEI ROC published on 30 September 2015 a statement entitled *Statement on INDIVIDUALS ACTING IN A BUSINESS CAPACITY*. The types of Individuals to be covered by LEIs due to this policy are sole proprietors, Board directors, Board members, and Board advisory members.

GLEIF will be working with the LEI ROC and the LEI Issuers to define the data elements to be captured for individuals and a process to collect data on individuals.

For more information, the following link is provided:

LEIROC policy on individuals acting in a business capacity
http://www.leiroc.org/publications/gls/LEI issuer_20150930-1.pdf

5. How do you determine and maintain information about organizational hierarchy? What data elements are captured?

Relationship data, beginning with ultimate and direct parent information according to accounting consolidation principles, as well as international branches, is being added to the LEI records, with planned expansion for coverage of additional relationship types.

Each legal entity would provide information on its direct and ultimate accounting consolidation parent on registration or annual renewal of its reference data.

The captured data elements are:
· 	Type of parent relationship (direct parent / ultimate parent / international branches)
· 	Period of relationship
· 	LEI of parent (as a link to reference data)
· 	Status of relationship (Active / Inactive + reason)
· 	Information of validation level
· 	Management information (creation date, last update date, next renewal date)
· 	Possible extensions

For more information, the following links are provided:

LEIROC policy on hierarchy information
http://www.leiroc.org/publications/gls/LEI issuer_20161003-1.pdf

Format descriptions
https://www.gleif.org/en/about-lei/common-data-file-format/relationship-record-cdf-format

6. Describe the process of recording historical changes as entities split, merge, and change, so that data can continue to be associated with them as they undergo these transformations over time. What data elements are monitored?

Today any LEI owner is obliged to provide updates on its reference data and to annually confirm its reference data to the related managing LEI issuer. In order to ensure that the data is of high quality, the LEI Issuers are requested to check the entity status at least once per each year. This requirement, combined with Challenge Management, ensures the timeliness of information.

The LEI ROC currently is working on a policy for the corporate events and corporate actions to be implemented within the GLEIS. The documentation from the LEI ROC will clarify how corporate

actions will be used in existing operations to reflect changes and updates to legal entity data records and relationship data.

It is anticipated that LEI entity and relationship data records will be updated to record changes due to bankruptcy, forced closure by a regulator or other government entity, liquidation, merger, change in place of incorporation/legal formation, change in address of headquarters, spin-offs, tenders/acquisitions/takeovers/purchase offers/buybacks and change in entity name. These corporate actions will become available free-of-charge and free-of-barriers, via files and other technical interfaces and on-request APIs.

A key feature of the LEI is that the code contains no embedded intelligence about the entity being identified by the LEI, a feature which presents several benefits. The LEI code, the identifier itself, need not be changed as a result of these events that effect the entities. The chain of historical data kept on this entity would be preserved.

Even with changes in entity ownership, the chain of historical data could be preserved through recording these changes and relationships between entities within the GLEIS.

The LEI Is persistent; an LEI and its related data records can never be deleted. History on all reference data changes is available forever.

For more information, the following link is provided:

History of all data files
https://www.gleif.org/en/lei-data/gleif-concatenated-file/download-the-concatenated-file

7. What are your time-frames for validating an entity and/or assigning a unique entity identifier (if applicable)?

GLEIF is a gateway to the network of local LEI issuing partners. GLEIF maintains a Service Level Agreement with each LEI Issuer. The timeframe for issuing an LEI is not a required service level. Rather it varies based on jurisdiction and legal entity type. While GLEIF does not require a specific timeframe for this particular service level, LEI ISSUERs compete for LEI registrations and most LEIs are issued within 24 hours. This allows legal entities to choose their provider based on their business needs, including time constraints, and also ensures the lowest possible fee for legal entity identification services.

It should be noted that any LEI issuance is based on self-registration by the eligible legal entity. The LEI Issuers perform validation services for the provided data. A fully-corroborated LEI data record requires a full check of all data items and status information against so-called authoritative sources, e.g. business, tax and other official registers. GLEIF maintains a list of global registration authorities.

For more information, the following link is provided:

Global registration authorities used by LEI Issuers in their validation service
https://www.gleif.org/en/about-lei/gleif-registration-authorities-list

8. What, if any, are the restrictions on public access to the information you collect and deliver? Are you willing to allow public access to organizational hierarchy structures?

The LEI is free from limitations on use, proprietary licensing and redistribution.

Free-of-charge, free-of-barriers public access to organizational hierarchy data will be provided for all LEIs under open data charter terms of use (see also question 3). The LEI ROC policy allows non-disclosure of hierarchy data only in cases of jurisdictional protection and restrictive data privacy laws. We are not aware of any restrictions for parent companies in the U.S. and Europe.

9. Describe your commercial pricing methodology or approach. Specifically, what Core and/or additional services are included in your commercial pricing approach? A price proposal is not required.

The LEI was implemented as a broad public good and its implementation and continued operations align with GSA's principle 'of protecting the integrity of the taxpayer's dollars throughout the award process.' LEI issuance and maintenance are operated under cost recovery principles with free access to all public and private users of LEIs.

There are both an initial registration fee and an annual maintenance fee set by the LEI Issuers according to the cost recovery principle.

GLEIF is a not-for-profit organization. GLEIF receives a portion of currently USD19 annually from the LEI Issuers for all valid and renewed LEIs. This fee is supposed to go down significantly (<USD5) by 2021 given the current growth projections and GLEIF's almost zero marginal costs per LEI. These projections are based on current or pending regulation and do not include any additional LEI issuances requested by the GSA. It is our desire to use additional growth to lower the fees further.

For the RFI, responses are provided on behalf of GLEIF. In the RFP stage to follow, GLEIF would want to engage with our LEI Issuers under Master Agreement contract. Bulk pricing models for the Core Validation and Additional Services are possible and would be operated subject to the oversight of the Regulatory Oversight Committee (LEI ROC) of the Global LEI system.

10. Are your processes the same for non-U.S. as it is for U. S. in terms of depth and breadth of coverage (data) and response time for services provided? How extensive is your non-U.S. presence? How many countries do your services cover?

GLEIF manages a network of global partners to provide local identification management services. Each local LEI Issuer is required to adhere to the GLEIF Service Level Agreement for LEI services. The use of the same processes globally ensures consistent services across all LEI Issuers but allows for local variation specific to that jurisdictions legal registration requirements.

As of 31 December 2016, 25% of the existing LEIs were for US based legal entities, 60% were for Europe based legal entities, and the remaining 15% were Asia, Africa, or Oceania based entities.

For more information, the following link is provided:

LEI statistical analysis
https://www.gleif.org/en/lei-data/global-lei-index/lei-statistics

11. How frequently do you update entity information?

Updates to LEI data records and relationship records shall be reported at any time by a legal entity to its LEI issuer. LEI data records and relationship records are validated at least annually upon renewal of an entity's LEI. The entity legal status, e.g. retired, merged, etc., is checked by the LEI ISSUERs at the end of the new issuance or renewal 12 month period.   This requirement, combined with Challenge Management, ensures the timeliness of information.

Also, refer to the response to question 6 regarding corporate actions to reflect changes and updates to legal entity data records and relationship data.

12. Do you have experience transitioning a customer(s) to your services from those of another provider? Please provide a large-scale example, similar in scope to what is described in this RFI.

The Global LEI System grows through regulatory requirements and has a proven ability to meet regulator's needs. In September 2012 the European Securities and Markets Authority and in October 2012 the Commodity Futures Trading Commission of the United States separately published regulation requiring the LEI for participants to OTC derivative transactions. In order to meet these regulatory requirements, the LEI system grew from less than 5,000 LEIs at the end of 2012 to over 155,000 LEIs by the end of 2014

Additionally, an important principle of the Global LEI System is the legal entity's choice. A legal entity chooses its desired LEI Issuer for registration and can subsequently change its LEI management free of charge.

13. If your approach includes providing a unique identifier, specify the globally accepted data standard. If it is not globally-accepted, describe your capability to associate it with other globally-accepted unique identifiers.

The LEI itself is a standard code and reference data record developed by the International Organization for Standardization (ISO). The ISO 17442 Legal Entity Identifier (LEI) standard was published in 2012.

The LEI enables unique identification globally of legal entities by means of a unique 20 digit code. The LEI data record includes the data elements specified in the ISO 17442 standard as well as additional data elements for administration, maintenance and status of the LEI.

In order to allow for easier transition GLEIF is in the process to establish mapping tables between the LEI and other identifiers. Those mapping tables will be provided free-of-charge, free-of-barriers and free from limitations on use, proprietary licensing and redistribution.

GLEIF works together with the Issuers of those identifiers and will certify their mapping routine. This is subject of a multi-year service level agreement between GLEIF and the other organizations. GLEIF seeks as many agreements possible with relevant public and private vendors.

Many vendors have expressed interest in this service. Initial mapping tables and related service level agreements are currently under development with the following organizations:

1. SWIFT (Society for Worldwide Interbank Financial Telecommunication) for the mapping of the LEI to the BIC (Business Identifier Code, ISO standard 9362)

2. ANNA (Association of National Numbering Agencies) for the mapping of the LEI to Issuers of any financial product having an ISIN (Identification of Financial Instruments, ISO 6166)

GLEIF continues to look for ways to increase the usefulness of the LEI by linking to other standards and data sets.

Examples:

 - GLEIF has worked with XBRL International to develop a standard LEI taxonomy in the XBRL standard. With LEIs incorporated into the XBRL used to file financial statements with the SEC in the EDGAR system, direct links to the financial statements of these legal entities can be established.

 - The LEI paired with a unique identifier for each application to GSA could facilitate aggregating applications by entity. Evaluating existing work being done on the assignment of unique transaction identifiers might be able to be leveraged to uniquely identify separate contracts, loans, grants and other federal assistance made to the same legal entity.

14. Describe customer support capabilities (including entity updates), for U.S. and non-U.S.? What channels do you use (self-service, assisted service)?

Each LEI Issuer is required to deliver certain Service Levels to GLEIF. These are controlled by the Service Level Agreement between GLEIF and the LEI Issuer. Legal entities choose their preferred LEI Issuer. Price, language capabilities, and additional services are some of the differentiating factors for LEI Issuers. Please refer to question 1.

15. How many entities does your system/service track/validate/maintain/manage?

Registered LEIs (March 2017) – over 495,000

GLEIF has a proven track record in all aspects of entity identification management including data collection, validation and maintenance of legal entity data in the U.S. and outside the U.S. for currently 200 jurisdictions. The Global LEI System has LEIs and validated LEI reference data of almost 500,000 legal entities and the ability through GLEIF's LEI issuer partner network to scale. GLEIF works internationally and is culturally diverse. GLEIF is responsible for implementing the policies of the LEI ROC and possesses the capability to adapt to emerging and evolving government requirements.

There are no technical nor organizational limitations to grow the population into millions of LEIs.

16. List any software required to use your system (i.e., web browsers, browser plug-ins, system extensions, databases, etc.).

LEIs and Legal Entity Reference Data is provided in a standardized XML file format, free for all users to download from the GLEIF website and without any restrictions or necessity to register. There are thus no software requirements to use LEI data.

Advanced services, such as an online instant search engine, the challenge facility for improved data quality and several more are available via the GLEIF website. The GLEIF website is available in 14 languages and supports all commonly used web browsers (MS Internet Explorer, Mozilla Firefox, Google Chrome, Apple Safari). The website also supports mobile devices.

For more information, the following links are provided:

Barrier free download of data
https://www.gleif.org/en/lei-data/gleif-concatenated-file/download-the-concatenated-file

Documentation on XML data formats
https://www.gleif.org/en/about-lei/common-data-file-format

Search the LEI index
https://www.gleif.org/en/lei-data/global-lei-index

17. How does your company safeguard entity data?

LEIs and Legal Entity Reference Data are available publicly at the GLEIF website. The data is protected against unauthorized modifications by several measures:

· Data transferred from LEI Issuers to GLEIF is protected by encrypted https SSL protocol;
· Files transmitted from LEI Issuers to GLEIF are digitally signed with an Extended Validation certificate based on the x.509 standard to ensure authenticity of the source;
· These files are stored in certified data centers (Datacenter Star Audit: 4 Stars) incl. automatic DR site replication to protect data against destruction. The data centers have ISO/IEC 27001, ISO20000-1, ISO 50001 and ISO 9001 certifications;

· Only authorized GLEIF staff has access to the data within a defined control framework.

18. What other concepts or processes should the government be considering?

The LEI can be integrated into all aspects of the procurement and financial assistance processes (from pre-award to award to post-award reporting, invoicing, and payments). GLEIF could discuss further with GSA the potential to use the LEI as a digital identifier throughout the process, on applications, reports, invoices and as part of payment transactions.

The RFI states that the entity information entered into the System for Award Management (SAM) is used throughout the government in procurement and financial assistance programs. There is a more comprehensive opportunity though that could be considered for additional benefit and cost savings to the US Federal government. Once adopted by GSA, the LEI could be leveraged across all government agencies, for example, the LEI could be required for all legal entities required to file regulatory, statistical or reports for other purposes across all applicable agencies in the US government and to identify US government agencies themselves.

No longer would each agency need to own and operate its own proprietary entity identification system and records. Statistics could be kept and records analyzed on the total engagement of an entity across the entire US Federal government.

There would be benefits for the entities in the private sector as well, to be able to leverage their LEIs for multiple purposes.

Larger private organizations already make use of LEIs in their customer master data files and Know Your Customer (KYC) utilities. The benefit is in cost savings for data maintenance, easier operations of data pools, cheaper data sourcing, and multiple operational gains. The LEI is supposed to enable smarter, less costly and more reliable decisions about who to do business with.

19. What issues or concerns do you foresee with respect to entity validation services described in this RFI?

GLEIF itself does not see concerns at this stage. When progressing to the RFP stage to follow, GLEIF would want to engage with our LEI Issuers in assessing the specific requirements for Core Validation and Additional Services.

20. What are creative/innovative ideas for how to structure the Government's approach?

The GSA could consider to endorse the LEI as the open legal entity identification standard for US government contractors. The GSA could then further partner with any private sector firm, GLEIF, or LEI Issuers to put in place the desired operational structure for making the best use of the LEI as an open data source providing reliable data for unique legal entity identification management. This would minimize costs for the GSA and all US Federal agencies through reliance on an open data standard subject to regulatory oversight and it would minimize costs to contractors requiring LEI through re-use in other government mandates.

GLEIF could discuss further with GSA the arrangement of a registration agent for LEIs in which GSA could act as a central source of issuing entity identifiers for any legal entity doing business with or filing reports to the US federal government. With the movement to improve the efficiency of the US federal government and to rationalize information reporting to the US federal government, real savings to the US taxpayers could be realized. GLEIF also could discuss further with GSA and applicable agencies the concept of mapping LEIs to other established, well used identifiers.

For more information, the following link is provided:

Registration Agents
https://www.gleif.org/en/newsroom/blog/act-now-the-concept-of-the-registration-agent-introduced-by-gleif-helps-firms-to-comply-with-reporting-requirements-under-mifid-ii-mifir-to-apply-as-of-january-2018

Respondents who can provide Entity Validation Services, please provide the following information and address the following questions in your RFI response:

1. Name of Company   Global Legal Entity Identifier Foundation (GLEIF)
2. Address of Company   Bäumleingasse 22, 4051, Basel, Switzerland
3. Name, phone number and email address of company representative
Stephan WOLF, CEO of GLEIF, Stephan.Wolf@gleif.org, +4969 907 499911

4. Company size standard and/or socio-economic standing; i.e., large business, small business, veteran-owned small business, service-disabled veteran-owned small business, HUB Zone small business, small disadvantaged business, or women-owned small business

Swiss non profit foundation

5. List any GSA schedule contracts or Government Wide Acquisition Contracts (GWAC) held by your company

No contracts held currently

6.Your Company's Primary NAICS code classification that best corresponds to the Government's Desired Outcomes

GLEIF does not have an NACIS code classification

7.Introduce your organization (e.g., parent, age, size, number of customers, offices, number of employees, etc.).

GLEIF in Numbers:
- Founded in 2014
- Revenue 2015 – 6,1M USD
- Number of employees – 30 from 18 countries
- Partners for LEI issuing (LEI ISSUERs) – 29, and growing
- Registered LEIs (February 2017) – over 495,000
- Registered office - Bäumleingasse 22, 4051, Basel, Switzerland
- Operating office – Bleichstrasse 59, 60313 Frankfurt am Main, Germany

8. List any relevant web sites for your company and its offerings.
www.gleif.org – in 14 languages of the G20

9. Identify major customers, similar in scope.

Primary users of LEI codes and data records are the public sector, global regulators, financial institutions, investment vehicles, corporates and subject matter experts, private individuals, researchers and statisticians.

GLEIF maintains a Vendor Relationship Group with regular updates and meetings with these organizations.

For more information, the following link is provided:

GLEIF Vendor relationship Group
https://www.gleif.org/en/lei-system/gleif-stakeholder-groups/gleif-vendor-relationship-group

10. Provide an affirmative statement if you can comply with the following:
• *Government has unlimited right to use, disclose, and share all data associated with the entity, including the identifier, if applicable, and maintains it in perpetuity*
• *All data fields including any provider's identifier are available for open use and reuse, both domestic and global.*

GLEIF affirms the above statements in regard to all LEIs and data and relationship records available for download on www.gleif.org.

Sincerely,

Stephan Wolf
CEO