



Derivatives Service Bureau
Consultation Paper – Phase 2
19th April 2017

1 Executive Summary

- Following the publication of the Final ISIN Principles Paper, consensus has been reached within the Derivatives Service Bureau Product Committee (DSB PC) as to the population of RTS 23 & CFI attributes (consistent with the published thinking from CPMI-IOSCO about the forthcoming Universal Product Identifier (UPI)) required for the Fixed Float Plain Vanilla Interest Rate Swap Product Definition to meet the MiFID II Reference Data Reporting requirements for implementation into the User Acceptance Testing (UAT) platform of the DSB
- The purpose of this consultation is to obtain industry feedback on the acceptability of this set of attributes within the Fixed Float Plain Vanilla Interest Rate Swap Product Definition, as an example, to ensure that the first phase (Day 1) ISIN level is as useful as possible to industry without compromising the technical reporting requirements of MiFID II / MiFIR RTS 23 Annex 1 and future implementation of CPMI-IOSCO's UPI
- The DSB PC intends to determine if any of the SG2 Level 1 attributes contained herein are useful for industry and should be added to the base RTS 23/CFI attributes in the Product Definition for the Day 1 implementation into UAT
- In addition, feedback is sought as to whether a similar approach of designing Product Definitions on the base RTS 23/CFI attributes plus adding none, some or all of the ISO Study Group 2 (SG2) Level1 attributes would be appropriate for other asset classes. The relevant SG2 level 1 attributes for other asset classes are laid out in Section 8 of this document
- This document also confirms the scope, principles and Product Definition design that the DSB PC will follow
- This consultation will run from **19 April 2017 to 12 May 2017**, followed by a series of further consultations during the subsequent months that will cover the full range of Product Definitions in each asset class
- Any feedback or queries in relation to this consultation should be directed to secretariat@ANNA-DSB.com and submitted no later than 12 May 2017

Contents

1	Executive Summary.....	2
2	Introduction	4
2.1	Background	4
2.2	Organization of this report and feedback to the consultation	4
3	Scope.....	4
4	Principles & Guidance	5
5	Product Definitions	6
5.1	Product Definition Selection attributes	7
5.2	Product Definition Input Attributes	7
5.3	Product Definition Derived Attributes	8
6	Enumerations.....	10
7	CPMI IOSCO.....	12
8	SG2 Level 1 Attributes for all other asset classes	13
8.1	Credit.....	13
8.2	FX.....	13
8.3	Equities.....	14
8.4	Commodities.....	14
9	ToTV & uToTV	15
9.1	Definition	15
9.2	Proposal – ToTV Indicator Creation	15
9.3	Proposal – ToTV Indicator Enquiry.....	16
10	Appendix 1	17
10.1	Summary of open questions:	17

2 Introduction

2.1 Background

For background information on the Derivatives Service Bureau (DSB), please refer to the Final ISIN Principles Paper located on the ANNA DSB webpage:

<http://www.anna-web.org/dsb-consultation-pc-phase-1/>

2.2 Organization of this report and feedback to the consultation

We have organized this consultation as follows:

- Section 3 outlines the scope of this consultation paper
- Section 4 outlines the key principles the DSB PC will use then defining the ISIN in this first phase of work
- Section 5 outlines the composition of the Product Definitions using the Fixed Float use case as a worked example
- Section 6 contains the enumerations and sources for the Fixed Float worked example
- Section 7 sets out the approach to meeting the CPMI-IOSCO requirements
- Section 8 contains the SG2 Level 1 attributes for all other asset classes for the consideration of industry
- Section 9 contains a proposal regarding the pending ToTV indicator requirement

General comments and responses to the specific questions are requested to be sent to the secretariat secretariat@ANNA-DSB.com.

In your response please identify your organization name and type (Trading Venue, Systematic Internalizer, Market participant, Vendor or Other)

Respondents should note that:

- All responses will be published
- Responses will be attributed unless there is a specific request for anonymity
- The Product Committee will consider all responses in the order in which they are received

3 Scope

The DSB PC has reached consensus on the population of RTS23 & CFI attributes (consistent with CPMI-IOSCO's thinking on the UPI) and has requested an industry consultation using the Fixed Float Plain Vanilla Interest Rate Swap as a worked example. Primarily this is to address the alignment with the SG2 work on levels and attributes.

The current set of agreed attributes consist of RTS 23 & CFI fields, however, there is scope within the ISIN design, across all asset classes, to include any other attributes from SG2 Level 1 that industry deems are necessary within the ISIN.

Section 5 contains the Fixed Float Plain Vanilla Product Definition and the SG2 level 1 attributes for consideration in either the input or derived fields.

Section 8 contains the additional SG2 Level 1 attributes for other asset classes.

4 Principles & Guidance

Following the publication of the Final ISIN Principles Paper, the DSB PC, with agreement of the DSB Board, confirms that ISIN generation by the DSB for OTC derivatives – specifically those that are trading or admitted to trading on an EU Trading Venue or with an underlying traded or admitted to trading on an EU Trading Venue – focuses on delivering an ISIN level that meets the immediate requirements of the EU Regulatory Technical Standard 23 for reporting within MiFID II. The remainder of this section has been extracted from the Final ISIN Principles paper, the full document can be found [here](#).

The initial OTC ISIN design:

- must be fully consistent with the ISO 6166 standard
- must meet the expectations of the ISO leadership as articulated above, including the generation of CFI and FISN codes
- must be extensible to multiple jurisdictions (generally) and as far as reasonably possible, consistent with CPMI-IOSCO's thinking on UPI

The initial OTC ISIN implementation:

- must meet the requirements of MiFID II as articulated by the ESMA observer on the Product Committee
- must be implemented within the timelines for MiFID II go-live

Additionally, the DSB Board expectation is that the DSB PC will leverage the ISO SG2 analysis for the initial **design** of the OTC ISIN wherever the DSB PC deems the SG2 analysis to be appropriate. However, the **implementation** of any aspects of the design that are not required for MiFID II go-live will need to be phased after MiFID II go-live unless there is unambiguous evidence that the initial implementation timelines will not be put at risk.

The CFI code will be an output from the ISIN engine and the inputs for this will form part of the Product Definition, either derived or input by the user. It is important to note that for the initial implementation, the ISIN engine will use the 2015 version of the CFI structure.

Furthermore, the DSB PC has agreed the following points, in-line with the requirements of the respective MiFIR Implementing act (RTS 23), and MAR Article 4 delegated and implementing regulations, for the ISIN that is to be produced for Reference Data Reporting:

- According to the requirements of Article 1 of RTS 23, trading venues and systematic internalisers are obliged to provide competent authorities all details of financial instrument reference data referred to in Table 3 of the Annex that pertain to the financial instrument concerned. Article 3(1) of RTS 23 subsequently specifies that each financial instrument should be identified through ISO 6166 ISIN code. Therefore, at least one of the ISIN Levels (referred to below simply as "ISIN") should allow derivation of all the fields required for RTS23 reporting that pertain to a given financial instrument.
- ISIN cannot be less granular than RTS 23¹ and for sake of clarity this means the ISIN must include the Maturity Date and other mandatory fields for those products as specified by MiFIR RTS 23 and respective XML template developed in accordance ISO 20022 messages.

¹ With the exception of Fixed Rate and Strike price to the extent they represent the pricing detail of a given transaction rather than reference data for a given instrument. Furthermore, these two attributes have been confirmed as out of scope due to the fact that the CFI code generation is independent of any pricing information.

This is due to MiFIR RTS 23 and MAR Article 4(1) requiring submission of reference data on a per financial instrument basis.

- ISIN can be more granular than RTS23 in terms of the number of attributes and/or the enumeration of the values for those attributes. ESMA has acknowledged that this may mean that it receives RTS23 reference data reports with different ISINs for the same attribute values.
- ISIN attributes/values provided to the DSB need to be able to map to RTS23 attributes/values but the former does not need to have RTS23 as native values so can diverge in format and enumerations. In order to satisfy the reference data reporting requirements under MiFIR RTS 23 and MAR Article 4 delegated and implementing regulations, the ISIN record returned by the DSB, which consists of all attributes input by the user, should be also provided in a common XML template in accordance with ISO20022. Any attribute mapping required to translate user input into the ISO20022 messaging standard will be provided by the DSB.
- Entities that are subject to MiFIR Article 27 or MAR Article 4 reference data reporting requirements are obliged to submit all the relevant attributes specified in the respective delegated and implementing acts in a common XML template in accordance with ISO20022 in order to comply with their regulatory obligations under the two Regulations.

The first phase (Day 1) **design** of the ISIN will support:

- Multi-jurisdiction/business Product Definitions
- Multi-level hierarchy

The first phase **implementation** will focus on the single level of ISIN to meet the immediate requirement of MiFID II as articulated by RTS23. Extensibility is factored into the ISIN design and the expectation is that CPMI-IOSCO requirements will be satisfied by a parent above the day 1 level while greater granularity to meet industry requirements can be created below the day 1 level as children.

The DSB Board and PC agree in principle with SG2 recommendation of implementing a multi-level design for the ISIN.

By following this approach, the DSB PC leaves open the ability to synchronize and integrate the CPMI-IOSCO work, as it finalizes the Unique Product Identifier requirements, as well as the recommendations from the SG2 work. Where there is a direct overlap then the specific product attributes are noted as being included in the current UPI consultation, sometimes under a different attribute name.

5 Product Definitions

A Product Definition is a fixed set of attributes that when populated will generate an ISIN.

The Use Case represents a unique product type and the selection of this will drive the Product Definition as well as being an attribute that differentiates between different Use Cases that share the same Product Definition.

As an example:

ISDA 2.0 Taxonomy						
#	Asset Class	Base Product	Sub-Product	Transaction Type	DSB Use_Case Name	DSB Product Definition Name
1	Rates	IR Swap	Fixed Float	<null>	Fixed_Float	Fixed_Float
2	Rates	IR Swap	Fixed Float	Zero Coupon	Fixed_Float_ZeroCoupon	Fixed_Float
3	Rates	IR Swap	Fixed Float	OIS	Fixed_Float_OIS	Fixed_Float

The “Fixed Float” product definition would be re-used (i.e. have same input attributes) for different Use Cases (“Fixed Float”, “Fixed Float_ZeroCoupon” & “Fixed Float_OIS”)

The following sections will use the ‘Fixed Float’ use case as a worked example of a Product Definition and cover:

- Selection attributes
- Input attributes
- Derived attributes

5.1 Product Definition Selection attributes

The design of the ANNA DSB ISIN Engine will allow a specific Product Definition to be selected based on both ISO and FPML taxonomies²:

ISO Attribute	NATIVE ISO Example Values	FpML (SG2) Attributes	FpML (SG2) Values
Asset Class	R - Rates	Asset class	Interest Rate
Use Case	Fixed_Float	Base product	IR Swap
Instrument Type	S - Swap	Sub-Product	Fixed Float
		Transaction Type	<null>

The above demonstrates, for a Fixed Float Plain Vanilla Interest Rate Swap, the attributes relevant to each taxonomy that will be available to users when selecting a specific Product Definition.

5.2 Product Definition Input Attributes

In order to generate an ISIN for the “Fixed Float” Use Case the below fields would need to be submitted in addition to the Template Selection attributes in either ISO or FPML taxonomies²:

ISO Attribute	NATIVE ISO Example Values	FpML (SG2) Attributes	FpML (SG2) Values
Notional Currency	EUR	Notional currency	EUR
Expiry date	20211231	Termination date	14/12/1999
First Leg Reference Rate	EUR-LIBOR-BBA	Floating rate index	EUR-LIBOR-BBA
First Leg Reference Rate Term Value	6	Index tenor	6M
First Leg Reference Rate Term Unit	MNTH	Index tenor	6M
Notional Schedule	C - Constant	Not analysed by SG2	

² It should be noted that this functionality will not be available for Day 1 UAT but will be made available once the two sets of mapping from ISDA/FpML format to ISO format are available:

1. ISDA 2.0 taxonomy & use case descriptions to ISO 10962 (CFI)
2. FpML enumerations & codesets to ISO 20022 enumerations & codesets

The above represent the minimum fields required to generate an ISIN that would meet the requirements laid out in this consultation paper.

In addition to the above, the ANNA DSB PC is considering the inclusion of the below attributes which were defined as part of the SG2 Level 1 ISIN:

SG2 Attribute	SG2 Value	SG2 Source
Floating Leg: Payment frequency	6M	FpML PeriodExtendedEnum / periodMultiplier
Floating Leg: Day count fraction	ACT/360	FpML day count fraction scheme
Fixed Leg: Payment frequency	1Y	FpML PeriodExtendedEnum / periodMultiplier
Fixed Leg: Day count fraction	30/360	FpML day count fraction scheme

Whilst the full set of attributes identified as part of SG2 has been considered it is felt that there is insufficient time remaining to build out the SG2 Level 2 and Level 3 proposals.

Question 1: Bearing in mind that the Day 1 implementation of the ISIN is intended to satisfy the MiFID II Reference data reporting requirements, whilst maintaining structural flexibility for implementation of additional levels in subsequent phases, are there any attributes in the SG2 table above that should be added to the Fixed Float Plain Vanilla Product Definition?

Please bear in mind that whatever is decided will form a Level in the overall ISIN Framework and will therefore restrict Higher Levels to a subset of attributes that exist in this list and Lower levels will be mandated to contain all of these attributes.

5.3 Product Definition Derived Attributes

In addition to the Input attributes there are additional attributes which are derived. These derived attributes are those which are inferred by the combination of Product Definition Selection & Product Definition Input Attributes. These will be auto populated by the DSB ISIN engine and returned to the user as part of the ISIN record.

ISO Attribute	NATIVE ISO Example Values	FpML (SG2) Attributes	FpML (SG2) Values
ISIN Status	New		
Version	1		
Parent	<null>		
Identification	ISIN		
Full Name	Rates Swap Fixed_Float EUR-LIBOR-BBA 6MNTH 20211231	Product name	Fixed-Float IRS
Classification Type	SRCCSP	CFI Code	SRCXX
Commodity Derivative Indicator	FALSE	Commodities derivatives indicator	FALSE
Underlying Asset type	C – Fixed – Floating	Sub-product	Fixed Float
Delivery type	P – Physical	Cash vs. physical settlement	
Single or Multi currency	S – Single Currency		
Issuer or operator of the trading venue identifier	NA	Issuer_Long_Name	N/A
Short Name	NA/SwapFixed_FloatEUR20211231	Financial instrument short name	MEFF/F 20161216 IBEX
Price Multiplier	1	Price multiplier	1
ISO First Leg Reference Rate	LIBO		

Question 2: Do you agree that these attributes can be derived from the Input attributes?

Question 3: Do you agree that these should be output by the ANNA DSB?

In addition to the above the ANNA DSB PC is considering the derivation of the below attributes, if deemed relevant, which were defined as part of the SG2 Level 1 ISIN:

SG2 Attribute	SG2 Value	SG2 Source
Issue_Description	SWAP_EQTY_Notional	ISO 6166
MiFIR identifier	DERV	ESMA RTS 2
Asset class of the underlying	INTR	ESMA RTS 2
Contract type	SWAP	ESMA RTS 2
Underlying type	INTR	ESMA RTS 2
Sub-asset class	Fixed-to-Float 'single currency swaps'	ESMA RTS 2 - Annex 3
Transaction type	Plain Vanilla	ISDA taxonomy v2.0

Question 4: Is the derivation of the above attributes useful for industry? If so, would this impact the industry's implementation and overall ability to meet RTS23 deliverables?

6 Enumerations

Alongside each attribute in the table below, the source has been assigned which specifies the exact reference (where applicable) of that attribute within the respective taxonomy³.

It should be noted that the JSON messaging schema the DSB is employing will contain all attributes listed below and their associated enumerations.

Full Name	DSB Source	SG2 Source
Asset Class	ISO 10962: 2015. Character #2	ISDA taxonomy v2.0
Classification Type	ISO 10962: 2015. Full Code	ISO 10962: 2015. Full Code
Commodity Derivative Indicator	ESMA RTS 23 (Boolean)	ESMA RTS 23 (Boolean)
Delivery type	ISO 10962: 2015. Character #6	
Expiry Date	Date YYYYMMDD (Expiry Date of the financial instrument)	
First Leg Reference Rate	http://www.fpml.org/spec/coding-scheme/fpml-schemes.html#s5.91	http://www.fpml.org/spec/coding-scheme/fpml-schemes.html#s5.91
First Leg Reference Rate Term Value	Integer	PeriodMultiplier (integer)
First Leg Reference Rate Term Unit	https://www2.swift.com/mystandards/#/mx/DRAFT6auth.036.001.01#content%2FFinancialInstrument%2FNewRecord%2FDerivativeInstrumentAttributes%2FUnderlyingInstrument%2FSingle%2FIndex%2FName%2FTerm%2FUnit	Period (FpML PeriodEnum)
Full Name	Full name of the instrument defined by DSB	
Identification (ISIN)	ISO 6166: 2013	
Instrument Type	ISO 10962: 2015. Character #1	ISDA taxonomy v2.0
ISIN Status	New, Deleted	
ISO First Leg Reference Rate	https://www2.swift.com/mystandards/#/mx/DRAFT6auth.036.001.01#content%2FFinancialInstrument%2FNewRecord%2FDerivativeInstrumentAttributes%2FUnderlyingInstrument%2FSingle%2FIndex%2FName%2FReferenceRate	
Issuer or operator of the trading venue identifier	"NA"	"N/A"

³ To access the relevant reference links below to the ISO20022 messages within swift/MyStandards, users are required to create a free account by following the link below and clicking 'Login to MyStandards' in the top right of the homepage: <https://mystandards.swift.com/>
Once an account has been created and login is successful, the links below will direct users to the correct reference.

Level	“InstRefDataReporting” (Label assigned to the ISIN to describe its level in the ISIN hierarchy)	
Notional Currency	ISO 4217: 2015	ISO 4217: 2015
Notional Schedule	ISO 10962: 2015. Character #4 (Swaps: Rates only)	
Parent	ISO 6166: 2013 (where relevant <null> otherwise)	
Price Multiplier	Double	
Short Name	ISO 18774: 2015	ISO 18774: 2015
Single or Multi currency	ISO 10962: 2015. Character #5 (Rates only)	
Underlying Asset Type	ISO 10962: 2015. Character #3	ISDA taxonomy v2.0
Use_Case	Unique human readable instrument label, created by the DSB PC and based on ISDA 2.0 taxonomy	
Version	Integer	

7 CPMI IOSCO

The Product Definitions have been designed to align with the current thinking⁴ on the forthcoming implementation of CPMI-IOSCO's UPI.

For the "Fixed_Float" Use Case the relevant attributes aligned with the current CPMI-IOSCO's thinking on UPI as per below:

ISO Attribute	NATIVE ISO Example Values	FpML (SG2) Attributes	FpML (SG2) Values
Asset Class	R - Rates	Asset class	Interest Rate
Instrument Type	S - Swap	Base product	IR Swap
First Leg Reference Rate	EUR-LIBOR-BBA	Floating rate index	EUR-LIBOR-BBA
First Leg Reference Rate Term Value	6	Index tenor	6M
First Leg Reference Rate Term Unit	MNTH	Index tenor	6M
Notional Schedule	C - Constant		
Underlying Asset type	C - Fixed - Floating	Sub-product	Fixed Float
Delivery type	P - Physical	Cash vs. physical settlement	
Single or Multi currency	S - Single Currency		

Question 5: Do you agree that the ANNA DSB should be designing the Product Definitions to align with the current thinking of CPMI IOSCO UPI requirements?

Question 6: Are there additional fields that you believe need to be added in order to ensure the goal of supporting CPMI IOSCO are met?

⁴ <http://www.iosco.org/library/pubdocs/pdf/IOSCOPD541.pdf>

8 SG2 Level 1 Attributes for all other asset classes

The tables below represent the SG2 Level 1 attributes that have not been included in the base RTS23/CFI attributes on which consensus has been reached for Day 1 UAT. The example values have been sourced from SG2 Use Cases.

Where applicable, any attributes that are included in the current CPMI-IOSCO UPI specifications have been marked in the right-hand column of the tables.

Question 7: Using the Fixed Float Plain Vanilla Product Definition as an example, are there other products in other asset classes where any additional SG2 Level 1 attributes outlined below should be added to the base RTS23 & CFI fields? In providing feedback, consideration should be given to any attributes that are relevant for CPMI-IOSCO's UPI.

8.1 Credit

SG2 Attribute	Example SG2 Value	SG2 Source	Relevant for CPMI-IOSCO
Issue_Description	SWAP_EQTY_Notional	ISO 6166	
MiFIR identifier	DERV	ESMA RTS 2	
Asset class of the underlying	CRDT	ESMA RTS 2	
Underlying type	TBD	ESMA RTS 2	
Sub-asset class	TBD	ESMA RTS 2 - Annex 3	
Transaction type	Standard North American Corporate	ISDA taxonomy v2.0	
Underlying Legal Long Name ID	Ford Motor Company		
Restructuring type	NR	FpML restructuring scheme	
ISDA definition version	2014		
Attachment Point	22		
Exhaustion Point	100		
Restructuring type	ModModR	FpML restructuring scheme	
Embedded Option on Swap	UNDERLYING Index data		
Option Currency	EUR		

8.2 FX

SG2 Attribute	Example SG2 Value	SG2 Source	Relevant for CPMI-IOSCO
Issue_Description	SWAP_EQTY_Notional	ISO 6166	
MiFIR identifier	DERV	RTS2 p167 non mifid ins	
Asset class of the underlying	CURR	RTS2 p167 non mifid ins	
CONTRACT SUB TYPE	NDLV, CASH		
Sub-asset class	<empty>	RTS 2 - Annex 3	
Issuer_Long_Name	N/A	ISO 6166	
Put Currency	INR	FpML ISO currency 4217 code	
Call Currency	USD	FpML ISO currency 4217 code	
Settlement Currency	USD	FpML ISO currency 4217 code	Y
Observation Period	Adjusted	fixingSchedule/startDate and fixingSchedule/endDate	

8.3 Equities

SG2 Attribute	Example SG2 Value	SG2 Source	Relevant for CPMI-IOSCO
Issue_Description	SWAP_EQTY_Notional	ISO 6166	
MiFIR identifier	DERV	RTS 2, Annex IV, Table 2, Field-3	
Asset class of the underlying	EQUI	RTS 2, Annex IV, Table 2, Field-4	
Contract type	SWAP	RTS 2, Annex IV, Table 2, Field-5 Part-43 Table-A1	
Sub-asset class	SWAP	ESMA RTS 2 - Annex 3	
Parameter	PRBP	RTS 2, Annex IV, Table 2, Field-26	
Transaction Type	Single Name	ISDA taxonomy v2.0	
Return type	Price / Total / Dividend	FpML Return Type enumeration	
Underlying Asset Initial Price Election	Hedge Execution	CFTC Part-45	
Notional currency 2	EUR	Part-43 Table-A1	
Dividend currency	<empty>	0	
Currency of Underlying Instrument	<empty>	ISO 4217 code	
Price Notation	<empty>	Part-43 Table-A1	
Settlement Currency	<empty>	0	
Option Currency	<empty>	Part-43 Table-A2	

8.4 Commodities

SG2 Attribute	Example SG2 Value	SG2 Source	Relevant for CPMI-IOSCO
Issue_Description	SWAP_EQTY_Notional	ISO 6166	
MiFIR identifier	DERV	ESMA RTS2 p167	
Asset class of the underlying	COMM	ESMA RTS2 p167	
Contract sub type	DLVB, NDLV	ESMA RTS2 p170	
Sub-asset class	<empty>	ESMA RTS 2 - Annex 3	
Further sub-product	<empty>	ESMA RTS23 p476	
Sub-product	<empty>	ISDA taxonomy v2.0	
Other terms indicator	N		
Other terms category	<empty>		

9 ToTV & uToTV

9.1 Definition

The definition of Tradeable on a Trading Venue (ToTV) or an Underlier Tradeable on a Trading Venue (uToTV) has not yet been finalized and published by ESMA.

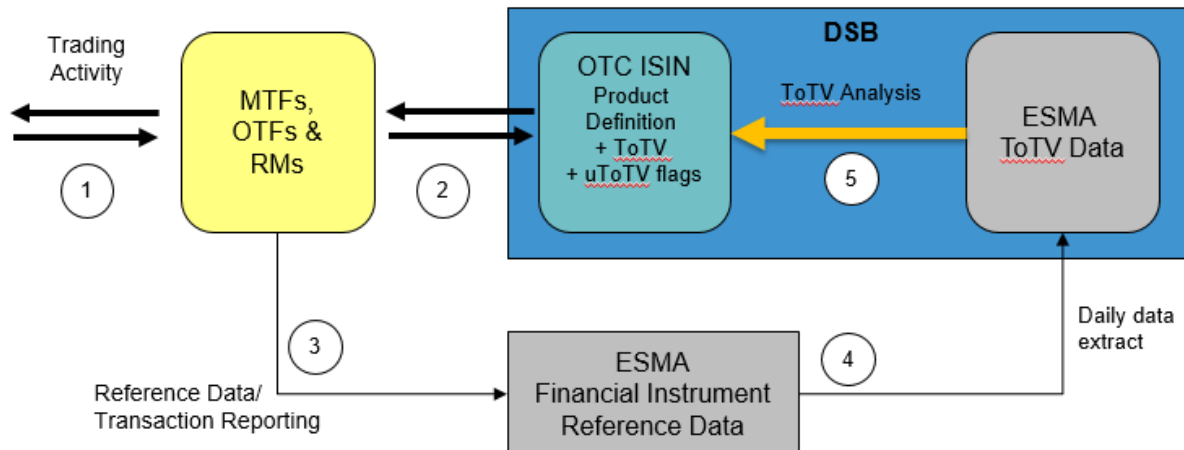
The DSB PC recognizes that the final definition of ToTV & uToTV may have an impact on ISIN granularity should the definition be limited to RTS23 attributes and/or the ISIN itself is included within the definition.

The DSB PC recognizes that there is a requirement for industry to understand the eventual ToTV/uToTV definition and apply it to ISINs created or retrieved from the DSB in order to determine their individual scope for Reference Data Reporting and other reporting obligations within MiFID II.

A conceptual proposal has been formed by the DSB PC which has the following objectives:

- Mutualize the cost of completing and maintaining the mapping between ISINs and ToTV for the industry
- Decouple the ISIN definition from the definition of ToTV – this allows the industry to define an ISIN that has a broader scope encompassing both other jurisdiction and industry requirements
- Ensure that any further changes to ToTV definition will be absorbed by the DSB without impacting the industry

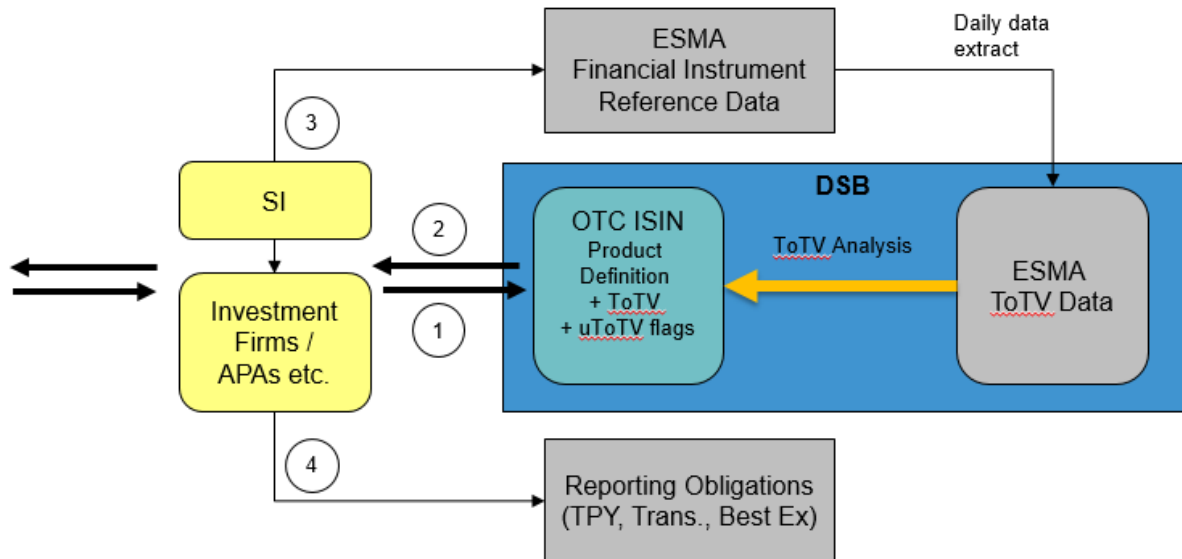
9.2 Proposal – ToTV Indicator Creation



1. European Trading Venues (TVs) support trading in OTC derivatives inside the scope of MiFID II.
2. TVs, by 2100 UTC, are required to obtain an OTC ISIN for those instruments they've supported from the DSB.
3. TVs, by 2100 UTC, are required to submit all reference data relating to the instruments tradeable on their platform to their NCA. ESMA then collates all this data within their FIRDS database.
4. ESMA publishes the reference data T+1 before 0900. The DSB imports this extract onto the platform.

- DSB then uses the ESMA dataset to mark all ISINs with the identical attributes as those from ESMA's data as ToTV and/or uToTV.

9.3 Proposal – ToTV Indicator Enquiry



- SIs quoting or trading an OTC derivative are required to obtain an OTC ISIN for ToTV instruments or uToTV. Investment Firms trading an OTC derivative have particular reporting obligations if the derivative is ToTV or uToTV.
- Workflows:

	Request	Response
1	Send an OTC Derivative ISIN.	Identify and return the OTC ISIN attributes and the current ToTV and uToTV flags.
2	Send a list of attributes and values for the proposed instrument or quote or transaction.	Identify a set of OTC ISINs and returns them with their current ToTV and uToTV flags.

- SIs are required to report reference data for all ToTV and uToTV instruments to their NCA. ESMA then collates all this data within their FIRDS database.
- SIs, Investment Firms & APAs have other reporting obligations dependent upon ToTV and uToTV of the instruments.

Question 8: Do you believe that the Product Committee's proposal for the DSB to indicate ToTV/uToTV would benefit the market? Please explain why

Question 9: Are there any other workflows in addition to the above that the DSB should accept or provide?

Question 10: Should the DSB also provide Liquidity/SSTI data in the response to users alongside the ToTV and uToTV flags?

10 Appendix 1

10.1 Summary of open questions:

No.	Question	CP Reference
1	Bearing in mind that the Day 1 implementation of the ISIN is intended to satisfy the MiFID II Reference data reporting requirements, whilst maintaining structural flexibility for implementation of additional levels in subsequent phases, are there any attributes in the SG2 table above that should be added to the Fixed Float Plain Vanilla Product Definition?	5.2
2	Do you agree that these attributes can be derived from the Input attributes?	5.3
3	Do you agree that these should be output by the ANNA DSB?	5.3
4	Is the derivation of the above attributes useful for industry? If so, would this impact the industry's implementation and overall ability to meet RTS23 deliverables?	5.3
5	Do you agree that the ANNA DSB should be designing the Product Definitions to align with the current thinking of CPMI IOSCO UPI requirements?	7
6	Are there additional fields that you believe need to be added in order to ensure the goal of supporting CPMI IOSCO are met?	7
7	Using the Fixed Float Plain Vanilla Product Definition as an example, are there other products in other asset classes where any additional SG2 Level 1 attributes outlined below should be added to the base RTS23 & CFI fields? In providing feedback, consideration should be given to any attributes that are relevant for CPMI-IOSCO's UPI.	8
8	Do you believe that the Product Committee's proposal for the DSB to indicate ToTV/uTOTV would benefit the market? Please explain why	9.3
9	Are there any other workflows in addition to the above that the DSB should accept or provide?	9.3
10	Should the DSB also provide Liquidity/SSTI data in the response to users alongside the ToTV and uToTV flags?	9.3