



International Organization for Standardization
Organisation internationale de normalisation
Международная организация по стандартизации



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**ISO/TC68/AG2 - Standards Advisory Group
Secretariat**

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To: DEPARTMENT OF HOMELAND SECURITY - U.S. Customs and Border Protection (CBP)

Re: OMB Control Number 1651–ONEW. Global Business Identifier

Dear Sir / Madam,

I write to you in our capacity as chair of the Standards Advisory Group (SAG) of Technical Committee 68 of the International Organization for Standardization (ISO).¹

The SAG as a subgroup of TC68 (TC68/AG2) acts as an advisory sounding board to support and engage with regulators on financial services standards requirements, for the effective and efficient use and development of financial services standards, delivered using a cooperative relationship approach. The SAG enables a proactive dialogue with regulators on financial services standards matters.

The SAG's objectives are:

- Provide a forum for mutual assistance between the global regulatory community and ISO in carrying out their respective authorities and responsibilities with respect to financial services standards;
- Aid the adoption and promotion of consistent standards, where possible;
- Effectively deal with common issues collectively and consistently; and
- Encourage strong and open communication within the regulatory community and with the industry concerning financial services standards.

The present SAG's initiative represents a collective view of its membership and draws upon its knowledge as an expert standard setting body with practitioner-led experience in the development and use of standards.

I write to you in reference to the [Global Business Identifier \(GBI\)](#) consultation and the related proof of concept the CBP is launching. The SAG agrees that a single solution to identify the different trade entities associated with US imports will greatly facilitate the collection of information on these entities.

¹ More information on the work of TC 68 can be found at: <https://committee.iso.org/home/tc68>.

Specifically, the SAG believes the ISO 17442 (LEI) standard could be leveraged in the support of the CBP requirements.

LEI stands for Legal Entity Identifier and is defined by the [ISO 17442](#) standard that specifies the minimum elements of an unambiguous scheme to identify the legal entities relevant to any financial transaction. It is applicable to legal entities, which include, but are not limited to, unique parties that are legally or financially responsible for the performance of financial transactions or have the legal right in their jurisdiction to enter independently into legal contracts, regardless of whether they are incorporated or constituted in some other way (e.g., trust, partnership, contractual). It includes governmental organizations, supnationals and individuals when acting in a business capacity, but excludes natural persons.

The LEI is a unique 20-character alphanumeric code. The code is neutral, with no embedded intelligence or country codes that could create unnecessary complexity for users.

The LEI enables clear and unique identification of legal entities, enhancing transparency in the global marketplace. Use of the LEI helps authorities in any jurisdiction to evaluate risk, conduct market surveillance and take corrective steps. In the private sector, the LEI is used for the unambiguous identification of legal entities in multiple processes including data and risk management and to increase operational efficiencies. The LEI connects to key reference data that enables the clear and unique identification of legal entities participating in financial transactions. Each LEI contains information about an entity's ownership structure – the corporate “tree” - and thus answers the questions of 'who is who' and 'who owns whom'. There is a formal validation process surrounding the issuance of the LEI to an entity that helps to ensure the entity is who they say they are. The publicly available LEI global directory can be found at [GLEIF.org](#).

The LEI is already used widely in the financial services industry as it is a key and mandatory component of various reporting regimes. The Global LEI System is overseen by a committee of global regulators known as the Regulatory Oversight Committee (ROC). The value proposition of LEI has already been recognized by several U.S. regulators such as the Federal Reserve, Consumer Financial Protection Bureau, Municipal Securities Rulemaking Board, National Association of Insurance Commissioners and U.S. Treasury. Further details on the use of the LEI in regulatory initiatives is provided on [GLEIF.org](#).

I stay at your disposal to further discuss and agree on the best way to determine a single identifier solution. You may contact us via the TC68/AG2 Secretary (see contact details in letterhead). We trust this proposal to help can be taken into consideration and be useful for the progress of your work.

Thank you and regards,

Karla McKenna

[signed]

Chair of the ISO/TC68/AG2