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European Banking Authority
Tower 42 (Level 18)
25 Old Broad Street
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Submitted online at www.eba.europa.eu

Dear Sirs

London Stock Exchange plc welcomes the opportunity to respond to the EBA's consultation paper EBA/CP/2013/42 on the use of the Legal Entity Identifier (LEI). LSE plc is part of the London Stock Exchange Group (LSEG), a leading diversified exchange business incorporating LSE plc, Borsa Italiana group, FTSE International, LCH.Clearnet Group and a technology company, MillenniumIT. The LSEG includes a range of entities that have a long and broad experience of providing neutral market services.

The London Stock Exchange was sponsored by the UK Financial Conduct Authority to be a Pre-Local Operating Unit (Pre-LOU) in June 2013 and commenced allocation of International Entity Identifiers (IEI) in August 2013. Following demonstration of our ability to meet the Principles and Recommendations set out by the Regulatory Oversight Committee (ROC) of the Global LEI System (GLEIS), the ROC has endorsed the London Stock Exchange as a globally accepted Pre-LOU for the allocation of Pre-LEIs. We support the intention of the EBA to recommend the use of the LEI as the unique code for supervisory reporting purposes.

In its Consultation Paper, the EBA asks for inputs to the cost/benefit analysis. As a ROC-endorsed provider of Pre-LEIs, we are happy to provide the registration and annual costs for the London Stock Exchange Pre-LOU:

Initial allocation fee:	£100 (€120, using exchange rate as at 27 November 2013) ¹
Annual maintenance fee:	£55 (€66)

It is our understanding that the costs stated in the consultation paper reflect the "local discretionary charge" highlighted in Recommendation 20 from the Financial Stability Board document 'A Global Legal Entity Identifier for Financial Markets – Annex 2 Recommendations for the development and implementation of the global LEI system'. We note that Recommendation 20 on sustainable funding of the global LEI system also identifies a "common fee" that is payable by each LOU, based on the number of registrations, to fund the operations of the Central Operating Unit alongside any costs of implementing and sustaining the governance framework. We understand that Pre-LOUs will be required to add this common fee to each Pre-LEI registration, based on the cost recovery model, and assume responsibility for passing the fee to the COU/Global LEI Foundation. These costs are excluded from the EBA cost/benefit analysis, although we would expect any additional charges to be low and to have minimal impact.

¹ Exchange rate of 1.1992 – Bank of England end of day spot rate, 27 November 2013



I hope that the EBA finds this contribution useful. Please do not hesitate to contact me regarding any questions raised by this letter or to discuss our comments in greater detail.

Yours faithfully

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