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| Response Form to the Consultation Paper on guidelines on standard forms, formats and templates to apply for permission to operate a DLT market infrastructure |
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**Responding to this paper**

ESMA invites comments on all matters in this consultation paper and in particular on the specific questions. Comments are most helpful if they:

* respond to the question stated;
* indicate the specific question to which the comment relates;
* contain a clear rationale; and
* describe any alternatives ESMA should consider.

ESMA will consider all comments received by **9 September 2022**

**Instructions**

In order to facilitate analysis of responses to the Consultation Paper, respondents are requested to follow the below steps when preparing and submitting their response:

1. Insert your responses to the questions in the Consultation Paper in the present response form.
2. Use this form and send your responses in Word format (**pdf documents will not be considered except for annexes**);
3. Please do not remove tags of the type <ESMA\_QUESTION \_DLTM\_1>. Your response to each question has to be framed by the two tags corresponding to the question.
4. If you do not wish to respond to a given question, please do not delete it but simply leave the text “TYPE YOUR TEXT HERE” between the tags.
5. When you have drafted your response, name your response form according to the following convention: ESMA\_DLTM\_nameofrespondent\_RESPONSEFORM. For example, for a respondent named ABCD, the response form would be entitled ESMA\_DLTM\_ABCD\_RESPONSEFORM.
6. Upload the form containing your responses, **in Word format**, to ESMA’s website (www.esma.europa.eu under the heading “Your input – Open Consultations” -> Consultation Paper on the clearing and derivative trading obligations in view of the benchmark transition”).

**Publication of responses**

All contributions received will be published following the close of the consultation, unless you request otherwise. Please clearly and prominently indicate in your submission any part you do not wish to be publically disclosed. A standard confidentiality statement in an email message will not be treated as a request for non-disclosure. A confidential response may be requested from us in accordance with ESMA’s rules on access to documents. We may consult you if we receive such a request. Any decision we make not to disclose the response is reviewable by ESMA’s Board of Appeal and the European Ombudsman.

**Data protection**

Information on data protection can be found at [www.esma.europa.eu](http://www.esma.europa.eu) under the heading [Legal Notice](http://www.esma.europa.eu/legal-notice).

**Who should read this paper**

# All interested stakeholders are invited to respond to this consultation. In particular, this paper may be specifically of interest to trading venues, CSDs or other entities envisaging to apply for specific permission to operate a DLT market infrastructure.

**General information about respondent**

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| --- | --- |
| Name of the company / organisation | Global Legal Entity Identifier Foundation (GLEIF) |
| Activity | Government, Regulatory and Enforcement |
| Are you representing an association? |  |
| Country/Region | Germany |

**Questions**

1. Do you have any comments or suggestions regarding the proposed guidelines? If so, please provide arguments supporting your comments and suggestions.

<ESMA\_QUESTION\_DLTM\_1>

First, GLEIF welcomes ESMA’s decision to make the LEI a required data field as part of the general information on the applicant. A consistent requirement of the LEI by competent authorities will enable multiple authorities assessing the applications to have the same level of understanding on the applicants and reduce complexities that local languages could present.

GLEIF would like to provide an update on the [vLEI program](https://www.gleif.org/en/vlei/introducing-the-verifiable-lei-vlei) that it recently launched. ESMA could consider the vLEI as a tool for verifiying who will access the DL and participating nodes, as required under (b) information on the functioning of the DLT used, as referred to in Article 7(2) of the DLTR.

The vLEI is fulfilling a critical requirement of establishing trusted decentralized identification and verification of organizations and the persons who represent them officially or functionally in a digital and globalized economy.

By combining three concepts – the organization’s identity, represented by the LEI, a person’s identity represented by their legal name, and the role that the person plays for the legal entity, vLEI credentials can be issued and become part of organizational wallets. vLEIs can be used to identify and verify digitally organizations and persons acting on their behalf for transactions on DLs. GLEIF would be pleased to provide an update to ESMA on the vLEI governance framework and potential use cases under DLTR.

<ESMA\_QUESTION\_DLTM\_1>

1. Is any clarification needed in respect of the content of certain items listed in the tables below? If so, please indicate.

<ESMA\_QUESTION\_DLTM\_2>

TYPE YOUR TEXT HERE

<ESMA\_QUESTION\_DLTM\_2>

1. Do you consider more specific forms or templates should be developed for certain items? If so, please specify.

<ESMA\_QUESTION\_DLTM\_3>

TYPE YOUR TEXT HERE

<ESMA\_QUESTION\_DLTM\_3>