

By E-Mail: rule-comments@sec.gov

Ms. Vanessa A. Countryman
Secretary
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549 - 1090
USA

28 May 2025

Self-Regulatory Organizations; The Depository Trust Company; Notice of Filing and Immediate Effectiveness of Proposed Rule Change To Amend the Rules Relating to the Legal Entity Identifier Requirement (SR-DTC-2025-009)

Dear Ms. Countryman,

The BVI¹ gladly takes the opportunity to present its views on the support of the proposed rule change filed with the Securities and Exchange Commission ("Commission") by the Depository Trust Company ("DTC") that will require DTC applicants applying to become a Participant, Pledgee, DRS Agent or FAST Agent to obtain and provide a Legal Entity Identifier ("LEI") to DTC as part of its membership application, as well as CDS Clearing and Depository Services Inc. to provide DTC with an LEI for each current participant of CDS for which CDS maintains a subaccount at DTC and for each newly added CDS Participant going forward.

BVI also supports the proposed requirement that each Participant, Pledgee, DRS Agent and FAST Agent must have a valid current LEI on file with DTC at all times. The requirement for an entity to review its LEI record contributes to maintaining a high level of data quality, because it requires re-validation of the LEI reference data recorded for a legal entity against third party sources by the LEI Issuer.

As noted in the proposed rule change, the costs of obtaining and renewing an LEI are minimal, and in addition, are governed by a cost-recovery model and imposed only to the degree necessary to cover the administrative expenses of the LEI system. Moreover, as cited in the proposed rule, approximately 89 % of Participants, 71 % of Pledgees, 46 % of DRS Agents, and 100 % of CDS Participants currently have an LEI.

The LEI empowers organizations to cut costs and create efficiencies across a wide range of business operations. It has already increased transparency within capital markets and banking by facilitating

¹ BVI represents the interests of the German fund industry at national and international level. The association promotes sensible regulation of the fund business as well as fair competition vis-à-vis policy makers and regulators. Asset managers act as trustees in the sole interest of the investor and are subject to strict regulation. Funds match funding investors and the capital demands of companies and governments, thus fulfilling an important macro-economic function. BVI's 116 members manage assets of EUR 4.5 trillion for retail investors, insurance companies, pension and retirement schemes, banks, churches and foundations. With a share of 26%, Germany represents the largest fund market in the EU. BVI's ID number in the EU Transparency Register is 96816064173-47. For more information, please visit www.bvi.de/en.



business-critical operations including KYC, client onboarding and AML processes. In a similar manner, the adoption of the LEI by DTC is a crucial step towards improving the quality of data that is collected from participants as well as the processes for collecting customer data.

BVI remains at the Commission's disposal to further discuss and support the adoption of the LEI requirement as proposed by DTC. Please do not hesitate to engage us in your discussions and questions related to the LEI.

Yours sincerely,

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Managing Director

Felix Ertl
Vice President