

Derivatives Service Bureau

Change Request Process

Version 0.7

June 2018

Preface

Change History

Date	Change	Version	Author	Revision Details	
21-Dec-17	Creation	0.1	Simon Wiltshire	Initial Version	
05-Jan-18	Change	0.2	Simon Wiltshire	Revised following internal review	
22-Jan-18	Change	0.3	Tony Birrell	Introduced DSB tactical/strategic approach and user impact ratings for ISIN scenarios	
20-Feb-18	Change	0.4	Tony Birrell	Minor amendments to Background and Workflow to incorporate PC feedback	
16-Apr-18	Change	0.5	Nathan Dagg	Minor amendment to background and roles and responsibilities section to incorporate PC feedback Incorporate operational feedback from DSB	
05-June-18	Change	0.6	Product Committee	Amendments, refinements and clarifications of some processes	
20-June-18	Change	0.7	A.Bargeron	Added link to Change Request Form	

1 Executive Summary

- This document aims to provide the clients of the Derivatives Service Bureau (DSB) with a
 comprehensive definition of the process required to take a change request from initiation
 through to release.
- The workflow laid down in the document is to apply to change requests that will impact the DSB Product Definitions or the ISINs held by the DSB.
- The DSB aims to follow a common change request process to provide participants in the process
 with a clear understanding of the state of the request and the further steps that are to be taken
 in addressing in the issue.
- The Change Request Process set out in this document is expected to evolve as industry use of the DSB service matures, therefore this should be considered a living document.
- Any feedback or queries in relation to DSB Change Request process should be directed to secretariat@ANNA-DSB.com

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2 Introduction

2.1 Document Purpose

This document aims to provide the users of the Derivatives Service Bureau (DSB) with a comprehensive definition of the process required by which a change request progresses from initiation through to release along with an overview of the representative way in which the issues raised in a change request might be addressed. The principles for the change request process shall be updated periodically reflecting the empirical observations over time and the feedback from DSB users.

2.2 Background

The change requests covered in the document concern the need to address issues with existing ISINs or with the Product Definition templates supplied by the DSB for the creation of the OTC Derivative ISINs.

More specifically, the workflow defined in this document aims to address the following specific scenarios (with examples), with this document to be updated from time to time as the list of required workflows and/or scenarios is augmented:

- The creation of an ISIN with incorrect or inconsistent attributes: where the identification codes of the underlying are checked only for format, not for validity against an official source.
 - The underlying identifier (ISIN, LEI) does not exist: identification codes are checked only for format, not for validity against an official database.
 - The underlying identifier (ISIN, LEI) is inconsistent with the product: an Equity Swap has the ISIN for a Bond as its underlying.
- The creation of two or more legitimate ISINs referencing the same instrument.
 - One CDS is defined by an underlying LEI, the other is defined by an ISIN that was issued by the same Legal Entity.
- A change in the enumerated values (which may be as defined by an industry body or ISO standard specification) used in one or more Product Definition templates.
 - A change of the version of the specification
 - A change in the source of the specification e.g. a move from ISO20022 to ISDA or vice versa)
 - o A new (more specific) CFI code is introduced.
 - o A new currency (defined by ISO 4217) is traded.
 - o An underlying Index is renamed by the governing authority
- The introduction of a new Product Definition template.
 - o Members of the DSB community start to trade a new Product
 - The DSB starts to support a new Asset Class

- A change in the attributes that are used in an existing Product Definition template.
 - The regulatory authority demands greater granularity in the Product Definition.

Changes may be initiated by the DSB itself, on the advice of the Product Committee or via an external request from a user. Once the issue has been raised with the DSB Secretariat, a standard workflow is employed that has been designed to ensure that changes are not implemented without their impact being analyzed and made visible to the user community.

The main principles of the workflow defined in this document is to provide the user community with a change request process that is:

Reliable provides safeguards to prevent errors

Transparent provides visibility of progress, timelines and impact including prompt

notification of changes to each

Predictable provides clear release schedules to assist planning

3 Process

3.1 Introduction

This section of the document provides a detailed explanation of the workflow that is to be undertaken by the DSB when a Change Request is raised. The Change Request may be raised by the DSB Client, by a Regulator, by the DSB itself or by any other interested party but all Change Requests will follow a common workflow through to completion.

3.2 Workflow Principles

As noted at the start of this document, the Change Request workflow aims to provide a reliable, transparent and predictable method of implementing any change to the Product Definitions and/or ISINs maintained by the DSB and to that end the following principles are applied:

- All change requests will follow a common workflow
- The DSB Secretariat (and an assigned member within that team) has responsibility to monitor
 the progress of the Change Request through its lifecycle and to ensure that all tasks are
 completed and reported to the community, with oversight of the Product Committee
- The DSB Secretariat will ensure that the issue originator is kept informed of the progress of the Change Request as it moves from state to state through the workflow
- All changes to ISINs or Product Definitions, including enhancements or bug fixes, are to be signed off by the DSB Product Committee

- The full details and progress of any change are to be made available to the industry through a subscription utility / website
- The time taken for the release of any change cannot be determined in advance since the scheduling of will depend upon the size/complexity of the change, its priority and any competing changes that are to be considered by the DSB Secretariat
- The Product Committee will consider any change requests
- Scheduled releases of changes to Product Definitions and/or ISINs will take place on an ongoing basis and in any case, not more frequently than a quarterly basis
- It will be possible that the DSB may organize an unscheduled release (non-quarterly) if the change request is deemed urgent or there is a need to align the release to an industry change (e.g.: new enumeration advised by an Industry body)
- Documentation such as functional or technical specifications or test plans are to be made available to the industry through the DSB GitHub utility and any other notified documentation links
- It is expected that this documentation along with the current status of any change request will be uploaded to GitHub on a timely basis, in line with the current process

In addition, any change proposed by the DSB in response to a change request must adhere to the following principles:

Persistence	Any change to existing (previously created) ISINs or their product attributes will need to be reviewed and approved by the DSB Product Committee
Extensibility	The change must be backward compatible – a change to the system should not require a change to the user's system – although they would benefit from the change if they did
Singularity	A superseded Product Definition cannot be used to create an ISIN – only the latest version of the Product Definition can be used
Traceability	It should be possible to trace the history of Product Definition changes to be able to identify different product definitions that have been used for the same product

3.3 Change Request Details

In order to raise a Change Request a client of the DSB, a regulator or another interested party will need to access the DSB website and complete the <u>change request form</u>. This will ask for the following details to be completed:

 Request Type 	Defines whether the request concerns a specific ISIN, a product		
	definition template, an enumeration change or other proposed change		
 Product Definition 	The name of the product(s) that will be impacted		

ISIN (Optional)
 The ISIN number(s) that is (are) the subject of the request

Request Description
 A freeform text description of the reason for the change request and any

supporting information. This should also include any key dates, the

names of any key influences on the change (regulatory authority etc.)

• Evidence (Link) A link to any supporting documentation for the proposed change.

• Evidence (File) Uploaded documents that can be used to support the proposed change

The following information will be recorded as a part of the user registration process and will be included automatically with the change request.

• Originator Organization The name of the organization represented by the originator

Contact Details The contact details (email, phone etc.) of the originator of the change

request

In addition, the usual audit information – dates, times etc. – will be recorded by the system.

3.4 Roles and Responsibilities

The Roles and Responsibilities of the DSB groups / teams involved in the process are summarized below:

• DSB Secretariat The DSB Secretariat has overall responsibility for ensuring the progress

of a change request from initiation through to completion. Specifically, it is responsible for gathering the details of the change request (including consultation with the wider industry), providing the documents that contain use cases for validation, normalization and enrichment rules, tracking and reporting the progress of the request and verifying that the

testing of the change has been completed.

• Product Committee The Product Committee is responsible for reviewing and approving or

rejecting any change request and the proposed schedule for that

change. The Product Committee may also consult with external industry standards groups (e.g. ISDA, CPMI-IOSCO) when seeking consensus on certain standards which may result in a change. If agreement cannot be

reached, it is possible for an issue to be escalated to the DSB Board.

DSB Development
 The DSB Development is responsible for the technical development of

any approved change along with the creation of a test harness (if

required).

• DSB QA The DSB QA team is responsible for ensuring that any development is

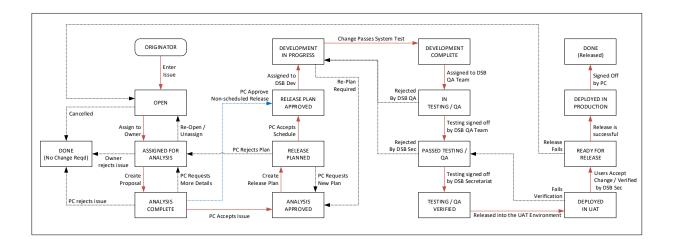
tested and satisfies the requirements of the test plan.

• DSB Support

The DSB Support team is responsible for organizing and coordinating the UAT of the change, for managing scheduled and unscheduled releases of any changes and for supporting the environment post-release.

3.5 Workflow Overview

The following diagram summarizes the Change Request workflow that is defined in more detail in the next section of the document. The diagram sets out a target operating model in a steady state environment and is for indicative guidance purposes only. The model may be expedited in the event of regulatory or Product Committee guidance.



The main points to highlight in this workflow are:

- The Change Request is recorded and assigned an identification number by the DSB Secretariat.
- The DSB Secretariat works with the DSB Development Team, the DSB QA Team, the DSB Support Team and relevant Industry Representatives to produce a Change Proposal (Functional and Technical Specification) in response to any Change Request.
- The Proposal is reviewed and approved, if appropriate, by the Product Committee.
- Once affirmed, a release plan is created by the DSB Secretariat in conjunction with the DSB Development Team and the DSB Support Team.
- The Release Plan is reviewed and, if appropriate, approved by the Product Committee.
- The Change is developed by the DSB Development Team who are also responsible for creating a test harness for the change.
- The change is tested by the DSB QA team and the test results are then verified by the DSB Secretariat.
- A User Acceptance Test with the DSB Clients is coordinated by the DSB Support Team
- The release of the change is managed by the DSB Support Team.

Appendix I: Possible Change Request Scenarios

Introduction

The following section of the document examines some of the possible reasons for raising a change request and looks at the options for how each situation might be addressed by the DSB.

The approaches suggested for each of these scenarios should be considered as illustrations of how each issue might be addressed and it should be stressed that each change request received by the DSB should be treated on a case-by-case basis. Once the industry has been consulted and the proposal has been presented to the Product Committee an appropriate course of action would be approved and undertaken by the DSB.

In most of the following examples, the result of the change request will be an ISIN that does not reflect the updated product definition. In order to address this issue, it is necessary to agree a consistent approach to dealing with the existing ISINs. This choice can be summarized as:

- Update existing ISINs
 - Automatically amend the attributes of the existing ISIN to reflect the new/correct
 Product Definition. If necessary, update the published Product Definition so all ISINs in the system adhere to the new Product Definition.
- Mark existing ISINs as DELETED
 - Any ISIN that does not adhere to the new/correct Product Definition would be marked as DELETED and, if necessary, a new version of the Product Definition would be defined. The old Product Definition would remain valid but could not be used for the creation of ISINs.
- Leave all existing ISINs
 - If necessary, produce a new version of the Product Definition but leave all existing ISINs as they are since they were correct at the time of creation. Only one version of a DSB Product Definition template will apply at any given time.

Categorisation

In each scenario identified below, the resolution options have been categorized, where applicable, in terms of the preferred tactical "short term" and long term strategic approach of the DSB coupled with the expected user impact that each would have. The DSB's preferred approach is the strategic solution, dependent on the facts and circumstances of the solution we may need to opt for a short term fix while the long term solution is fully vetted or if the time to market for the LT solution is suboptimal to the user community.

Impact	Description
TACTICAL Interim approach of the DSB whilst a strategic solution is developed – as sea above	
STRATEGIC	The DSB will work with industry to achieve this optimal solution

The user impact categories are as follows:

Impact	Description	Lead time
LOW	Change is backwardly compatible and does not affect existing ISINs	6 weeks
MEDIUM	Change is backwardly compatible but DOES affect existing ISINs	10-12 weeks
HIGH	Change is not backwardly compatible and DOES affect existing ISINs	12+ weeks

The DSB will, in each case, opt for the resolution option that is of least impact to users.

Issues with Existing ISINs

In some cases a DSB client may raise an issue with one or more ISINs that have been created by the DSB. In all the following cases, the creation of the ISIN has followed the correct template and has supplied valid attributes. However, in these cases there is a possible issue with the value referenced by the contents of the attributes.

Changes to existing ISINs will be made available to the industry via the current DSB FIX link or file download.

1. An Incorrect or Inconsistent ISIN

Examples:

- Underlying ISIN or LEI used in the ISIN definition does not exist
- Underlying ISIN or LEI is inconsistent (Equity ISIN for a Debt Deriv.)
- System bug causing the creation of incorrect ISINs

Result:

- The ISIN satisfies the validation required by the DSB.
- But the industry needs to be aware that it is invalid (from a business point of view).
- The ISIN has been created and it (with its attributes) may have been reported.

Option 1 – TACTICAL / User impact MEDIUM

- Mark the ISIN as DELETED in the DSB database (with Reason Code, Date etc.) The DSB's ISIN status document can be found here.
- Inform the originator / industry that the ISIN is incorrect and they should apply for a new one.
- ISIN remains in the system but would not be used by the industry (as marked DELETED).

Option 2 – User impact MEDIUM

- Leave the ISIN in its created state
- Inform the originator / industry that the ISIN is incorrect and a valid ISIN should be used.

Option 3 – STRATEGIC

- Link the DSB to the sources of reference IDs so that a more complete validation can be performed.
- This would be a long-term aim for the DSB and is not something that can be considered in the short-term.

2. Duplicate ISINs

Example:

 One CDS is defined with an underlying LEI, a second CDS defined with an underlying ISIN issued by the same legal entity.

Result:

• Without business knowledge, the industry is unable to link the two ISINs and see that they refer to the same OTC Derivative Product.

Neither ISIN is more "correct" than the other, they can both be considered as valid.

Option 1 – User impact MEDIUM

- Mark the ISINs as duplicate and provide a linking ID.
- Inform the originator / industry that the ISINs are duplicate but that there is a way of linking them
- Care must be taken since interpreting the contents may be difficult.

Option 2 – User impact HIGH

Reduce the possibility of duplicates by making the validation stricter (using only one valid code).

Option 3 – TACTICAL / User impact LOW

Leave the ISIN in its created state

Option 4 – STRATEGIC

- Link the DSB to the sources of reference IDs so that a more complete validation can be performed.
- This would be a long-term aim for the DSB and is not something that can be considered in the short-term.

Example:

System bug causing the creation of duplicate ISINs

Result:

Both ISINs are technically valid.

Option 1 – TACTICAL / User impact MEDIUM

- The ISIN that was created first will remain unchanged while all later ISINs will be marked as DELETED.
- Inform the originator / industry that the ISINs are duplicate (with later ones marked as deleted).
- The DSB will also update all users of changes made via a technical notification

Option 2 – User impact HIGH

- Mark the ISINs as duplicate and provide a linking ID.
- Inform the originator / industry that the ISINs are duplicate but that there is a way of linking them.
- Care must be taken since interpreting the contents may be difficult.

3. Non-Standard Product used for a Specific Product

Examples:

- An ISIN defined as a Non-Standard product having the same attributes as an ISIN defined with a specific template.
- A DSB Client can create an ISIN using one of the Non-Standard Product Definitions using exactly the same attributes (except Product Name) as would be used with one of the specific Product Templates.

Result:

 This may be considered an invalid use of the ISIN Product Templates but the instrument may have significant non-standard attributes (eg: optionality) that are not part of the specific product from which it is derived.

Option 1 (if invalid) – User impact MEDIUM

- Update the Product Name on the ISIN to reflect the (correct) specific Product Definition that should have been employed originally.
- Inform the originator / industry that the ISIN has been updated and provide the renewed details.

Option 2 (if invalid) – User impact HIGH

- Mark the ISIN as DELETED
- Inform the originator / industry that the ISIN is incorrect and they should apply for a new one
- ISIN remains in the system and cannot be re-used.

Option 3 – TACTICAL / User impact LOW

- Leave the ISIN in its created state since the current onus on correct Product Definition submission sits with the user

Changes to the Attribute Enumeration

In some cases, a regulatory authority or standards body may change the valid enumerated values that are applied by the DSB in the Product Definition templates. Such a change will have an impact on existing ISINs (that were created using the "old" value) and on the Product Definitions – that will need to be updated to use the new enumeration.

4. Additional enumeration

Examples:

- A new market index is created and needs to be added to the DSB enumerations.
- A new currency is approved to be added to the ISO standard and needs to be added to the DSB enumerations

Result:

- Since the product has not been supported, no ISINs will have been created previously.
- New enumeration is only relevant for users who wish to generate ISINs over the new value.

Option 1 – TACTICAL / User Impact LOW

- Add the new enumeration to the respective Product Definition and allow ISINs to be created using that enumeration.
- There are no existing ISINs so no historical actions can take place.

5. Change Enumeration (one-to-one)

Examples:

- The ISO currency code for Turkish Lira (TRL) is changed to TRY because of devaluation.
- The CDS Index is renamed from "Itraxx Europe" to "Itraxx EMEA"

Result:

- The new value is a direct replacement of the previous value.
- TBC: is it necessary to re-confirm open positions after such an event?

Option 1 – User impact HIGH

- Mark any existing ISINs (using the superseded value) as DELETED.
- Create a new version of the Product Definition based on the new value.
- DSB client can enquire on the original version.
- New ISINs can only be created using the latest version of the Product Definition.
- Using the new value with the latest product definition will return the same ISIN as using the original value with the original product definition would have done.

Option 2 – TACTICAL / User impact HIGH

- Amend the enumeration on all existing ISINs that use the "old" value.
- Inform the originator / industry that the ISIN values have been updated (with details) so they can amend their records.
- Create a new version of the Product Definition based on the new value.

- The old value no longer exists within the Product Definition and all requests will be rejected.

6. More Specific Enumeration (one-to-many)

Examples:

- The CFI Code for "Cap/Floor" is split into "Cap" and "Floor".
- A separate ISO Currency Code for Catalonia is introduced (EUR becomes CTP and EUR)

Result:

- The impacted Product Definition templates need to be updated to accept the new values.
- It may be possible to determine (from other attributes) which new value should be applied to existing ISINs, but this is not always the case.
- TBC: is it necessary to re-confirm open positions after a currency change?

Option 1 – TACTICAL / User impact HIGH

- Create new versions of the Product Definition based on the new value.
- Delete the old version of the Product Definition.
- Leave existing ISINs in their created state since the DSB is not responsible for determining the new value.
- Inform the originator / industry that new Product Definitions are available so they can amend their records.

Option 2 – User impact HIGH

- Mark any existing ISINs (using the superseded value) as DELETED.
- Create new versions of the Product Definition based on the new value.
- DSB client can enquire on the old version for the Product Definition but not create ISINs.
- New ISINs can only be created using the latest version of the Product Definitions.
- Using the updated product definition will return a new ISIN.
- Additionally, provide a mapping database to show the ancestry of an ISIN (parent-child)

Option 3 – STRATEGIC / User impact HIGH

- Update all existing ISINs that are based on the "old" value so that they are based on one of the new values. This may involve an amount of analysis to determine the appropriate value to be used for each ISIN.
- Inform the originator / industry that the ISIN values have been updated (with details) so they can amend their records.
- Introduce new versions of the Product Definition employing the new values.
- The old version of the Product Definition is invalid and cannot be used.

7. More Generalized Enumeration (many-to-one)

Examples:

• The Euro currency code (EUR) replaces a number of national currency codes.

Result:

- The new value is a generalisation of the previous value
- TBC: is it necessary to re-confirm open positions after such an event?

Option 1 – TACTICAL / User impact HIGH

- Create a new version of the Product Definition based on the new value.
- Delete the old versions of the Product Definition.
- Leave existing ISINs in their created state since the DSB is not responsible for determining the new value.
- Inform the originator / industry that a new Product Definition is available so they can amend their records.

Option 2 – User impact HIGH

- Mark any existing ISINs (using the superseded value) as DELETED.
- Create new versions of the Product Definition based on the new value.
- DSB client can enquire on the old version for the Product Definition but not create ISINs.
- New ISINs can only be created using the latest version of the Product Definitions.
- Using the updated product definition will return a new ISIN.
- Additionally, provide a mapping database to show the ancestry of an ISIN (parent-child)

Option 3 – STRATEGIC / User impact HIGH

- Update all existing ISINs that are based on the "old" values so that they are based on the new value.
- Inform the originator / industry that the ISIN values have been updated (with details) so they can amend their records.
- Introduce a new version of the Product Definition employing the new value.
- The old version of the Product Definition is invalid and cannot be used.

8. Existing Product Definition replaces a general enumeration with a specific enumeration Examples:

- A CFI code for "Rollercoaster" is introduced (specializing the "Other" enumeration)
- A CFI code is introduced where an existing product currently uses X (Not Applicable)

Result:

- Before the change, ISINs were created with "Other". After the change, a more specific enumeration is
 to be used.
- This is similar to a one-to-many enumeration change except that the Product Definition remains in place.

Option 1 – TACTICAL / User impact HIGH

- Create new versions of the Product Definition based on the new value.
- Delete the old version of the Product Definition.
- Leave existing ISINs in their created state since the DSB is not responsible for determining the new value.
- Inform the originator / industry that new Product Definitions are available so they can amend their records.

Option 2 – User impact HIGH

- Mark any existing ISINs (using the superseded value) as DELETED.
- Create a new version of the Product Definition based on the new value.

- Inform the originator / industry that the ISIN values have been updated (with details) so they can amend their records.
- DSB client can enquire on the old version for the Product Definition but not create ISINs.
- New ISINs can only be created using the latest version of the Product Definitions.
- Using the updated product definition will return a new ISIN.

Option 3 – STRATEGIC / User impact HIGH

- Update all existing ISINs that are based on the "old" value so that they are based on one of the new values. This may involve an amount of analysis to determine the appropriate value to be used for each ISIN since some ISINs may not need to be updated.
- Inform the originator / industry that the ISIN values have been updated (with details) so they can amend their records.
- Introduce new versions of the Product Definition employing the new values.
- The old version of the Product Definition is invalid and cannot be used.

Changes to the Product Definition

On occasion, the industry will determine that a new Product needs to be supported by the DSB – either because the scope of the DSB has been extended or because an existing non-standard product requires specific support.

It should be noted that any product definition changes documented here explicitly exclude the addition of another level. It is possible that the industry may request the creation of a new level but such a request would be a major undertaking and would expand the purpose of this document.

9. Add a New Product Definition

Examples:

• The scope of the DSB is extended to include a new asset class (eg: Freight).

Result:

Since the product has not been supported, no ISINs will have been created previously.

Option 1 – TACTICAL / User Impact LOW

- Add the new Product Definition and allow ISINs to be created using that template.
- There are no existing ISINs so no historical actions can take place.

10. Define a New Product that was previously Non-Standard

Examples:

- DSB Community start to trade a new instrument previous ISINs created as a Non-Standard Product
- Previous non-standard ISINs are the same as new ISINs that have a defined Product

Option 1 – User impact HIGH

- Amend existing ISINs to use the new product definition this may require substantial analysis since other products will have used the non-standard definition.
- Inform the originator / industry that the ISIN values have been updated (with details) so they can amend their records.
- The old product definition is still valid, but not for the new (specific) product

Option 2 – User impact HIGH

- Amend the validation but mark the existing ISINs as DELETED. Substantial analysis would be required to ensure that the correct ISINs were marked.
- Introduce a new version of the Product Definition
- All new ISINs in this product would need to be based on the new product definition

Option 3 – TACTICAL / User Impact LOW

- Introduce the new product definition but do not touch the existing ISINs
- Inform the originator / industry that there is a new Product Definition and allow them to reapply for ISINs if required.

11. Enhance existing product definitions with new functionality

Examples:

• The Commodity Basis Product Definition should allow the same Reference rate to be submitted under Reference rate & Other Reference rate

Result:

- New ISINs can be created with the new functionality
 Option 1 TACTICAL / User impact LOW
 - The ISIN that was created first will remain unchanged while all later ISINs will be marked as DELETED.
 - Inform the originator / industry that the ISINs are duplicate (with later ones marked as deleted).