

DERIVATIVES SERVICE BUREAU

INDUSTRY CONSULTATION - 2027 DSB SERVICE PROVISION

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AREAS OF FOCUS

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I. DSB OVERVIEW

What is the DSB?

- A technology **platform** which generates an identification hierarchy for OTC derivatives
- Within its scope of OTC derivatives, it provides an archive of International Security Identifier Numbers (**ISINs**) and Unique Product Identifiers (**UPIs**) and their associated **instrument reference data**
- It is **global** in design and operation, operated under the ISO principles including on a **cost recovery** basis

What does the DSB do?

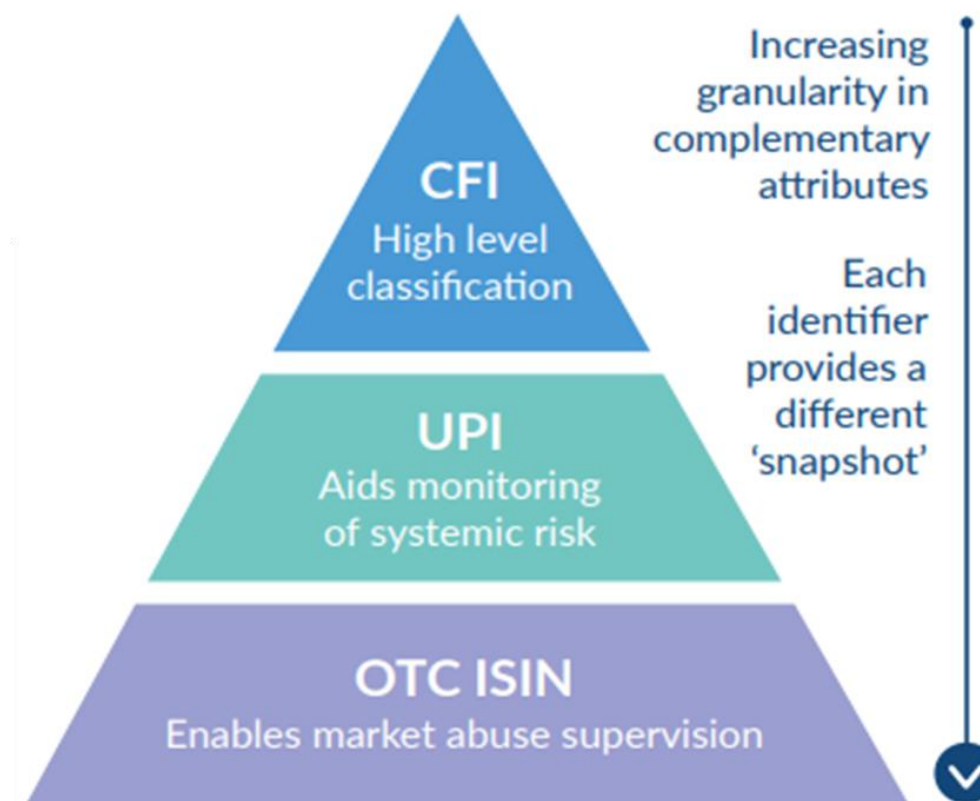
- **ISIN, UPI, CFI and FISN generation and retrieval** for OTC derivative products, as required by market participants
- **Distribution of OTC ISINs and UPIs** and their associated reference data to market participants
- Access methods include a **web interface, programmatic connectivity** and **file download**

Drivers

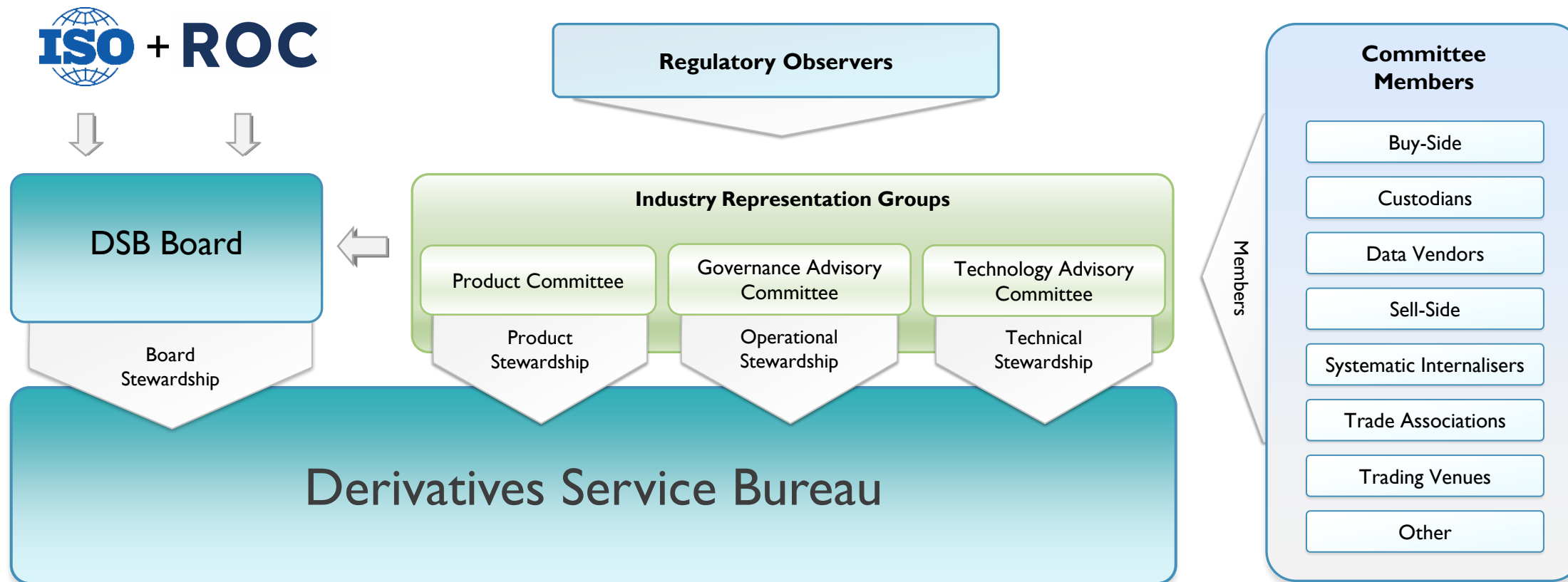
- **EU and UK regulators** have **mandated** that ISINs are used to identify some **OTC derivatives** for regulatory reporting
- Jurisdictional mandates in place for the **US, EU, UK, AU, SG, JP, CA, HK, KR, MX & SA** require the reporting of UPI into firms reporting workflows for submission to trade repositories
- The **DSB** is the sole source of **ISINs and UPIs for OTC derivatives** and was engineered to serve the needs of authorities and industry participants, to enable fulfilment of supervisory responsibilities and regulatory obligations

I. DSB OVERVIEW - CFI, UPI & OTC ISIN ALIGNMENT

- The DSB is the global numbering agency and service provider for both the UPI and the ISIN for OTC derivatives
- The UPI and ISIN, together with the CFI, form the ISO framework for OTC derivatives identifiers
 - ISO 10962 CFI - Classification of Financial Instruments
 - ISO 4914 UPI – Unique Product Identifier
 - ISO 6166 ISIN – International Securities Identification Number



2. GOVERNANCE



3. KEY PRINCIPLES OF THE DSB

Cost Recovery

- The DSB provides all numbering agency services on a cost recovery basis, with costs allocated fairly among stakeholders. This means that the revenues must be sufficient to ensure the financial viability to meet its continuing obligation to provide these services.

Unrestricted Data

- The DSB intends that no data associated with the definition of an OTC ISIN or UPI will have licensing restrictions dictating usage or distribution. However, if licensed or restricted data is deemed necessary by the [DSB Product Committee](#), a review will be conducted to assess its impact on the Unrestricted Data policy, considering affected products and attributes.

Open Access

- Access to the OTC ISINs, UPIs and associated reference data will be available to all stakeholders.

3. KEY PRINCIPLES OF THE DSB

Economic Sustainability

- To the extent possible, the DSB will levy fees through annual contracts that require payment in advance.
- This advance yearly commitment offers the DSB more clarity in aligning fee levels with cost recovery and helps ensure economic sustainability over time.

Equal Treatment

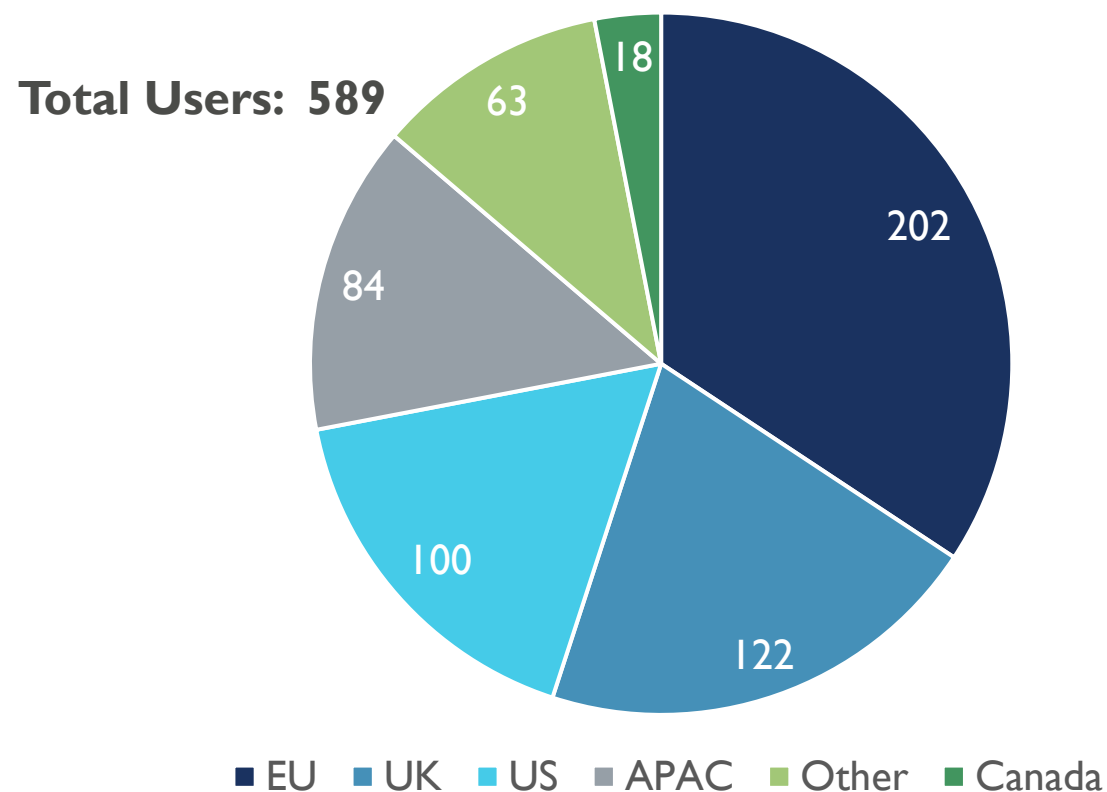
- As an industry utility, the DSB aims to ensure parity and efficiency in delivery of our service. This includes following standardised processes and procedures for all users of the DSB operating under the cost recovery-based services.
- The DSB has a common agreement in place ensuring equal treatment across all users. Any exceptions to the terms are only introduced on the basis that they can be consistently applied without imposing a risk on the service.

Separate Service Provision

- Access to DSB Services should not be tied or bundled with any other service offered by the DSB. Services can only be offered under the condition and to the extent that separate Services are offered and that it is not a condition for users to buy such other services.

4. DSB USER BASE

Unique Users of the OTC ISIN and UPI Services by Jurisdiction



Fee-Paying Users:

- 170 OTC ISIN Users
- 486 UPI Users
- Including 67 combined OTC ISIN & UPI Users
- 80 jurisdictions supported (48 fee-paying)
- 8 OTC ISIN & 14 UPI Distributors

Additional stakeholders:

- 11 authorities supported
- 2,300+ non-fee-paying organisations

5. CONSULTATION OVERVIEW

- Incorporates queries and feedback received from industry, including the Product Committee, Governance Advisory Committee and the Technology Advisory Committees, since the DSB's consultation in 2025.
- To streamline the consultation process, the DSB publishes a single consultation containing comprehensive information for users to consider. This approach allows user fees to be published in October, rather than December of each year, as requested by stakeholders to bring the annual fee publication date forward.
- The DSB utilises targeted consultations and engages with the Industry Representation Groups throughout the year to address any regulatory changes or industry requirements that fall outside the larger annual consultation process.
- The [2026 Industry Consultation paper](#) related to the 2027 UPI, OTC ISIN and CFI service provision presents detailed information for market participants' review and feedback. The consultation questions this year seek to obtain industry views on fair allocation of cost recovery, tiering of the Distributor user type, Acceptable Use Policy breaches, alternative identifiers in the UPI Service and bilateral engagement with the DSB.

6. UPDATE ON ACTIVITIES FROM PRIOR CONSULTATIONS



Completed:

1. Security Controls: Security Operations Centre
2. Initial phases of Global Agile Architecture (GAA) Programme
3. Transition of DSB ToTV/uTOTV Service to Ancillary Service
4. Implementation of Cost Allocation Policy Split between UPI and OTC ISIN Services

Work being undertaken in 2026:

1. Continuation of Global Agile Architecture (GAA) Programme
2. Completion of Data Leakage Prevention (DLP), Data Classification and Data Labelling
3. Consultation on Tiering of Distributor User Types
4. Consultation with Direct Consumers of UPI and OTC ISIN Data

7. SUMMARY OF PROPOSALS AND COST IMPACT

Questions	PROPOSED COST IMPACT – UPI	PROPOSED COST IMPACT – OTC ISIN
Q1 – Fair Allocation of Cost Recovery	• €0k	• €0k
Q2 – Tiering of Distributor User Types	• €0k	• €0k
Q3 – Acceptable Use Policy Breaches	<ul style="list-style-type: none"> • 2027: €42k • 2028+: €0k p.a. 	<ul style="list-style-type: none"> • 2027: €21k • 2028+: €0k p.a.
Q4 – Alternative Identifies in the UPI Service	• €0k	• €0k
Q5 – Bilateral Engagement with DSB	• €0k	• €0k

Cost estimates include Financial Sustainability Margin @ 20% and a provisional 4% annual inflationary uplift.

8.I. FAIR ALLOCATION OF COST RECOVERY

Background

- 75% of the user base currently access DSB free data as Registered Users, not contributing to cost recovery.
- User Types are based on functionality and timeliness of access to data.
- Following industry consultation in 2025 on proposals to consumption and distribution of DSB data, the Distributor User Type was introduced on 1 January 2026.

Considerations and Market Testing

- Alternative approaches to increase contributions to cost recovery have been considered, including revising the content and timeliness of free data with introduction of a new file download 'Full FDL' User Type.
- An initial market testing exercise was conducted on a small sample of Registered Users, Infrequent Users and Distributors that would be impacted by changes to the FDL raising questions on the impact of the newly created Distributor User Type, the role of Distributors and Intermediaries and access requirements to DSB data.

Proposal

- DSB is recommending a holistic user model review with stakeholder input during discovery phase to influence timing and direction of future reforms.

8.I. FAIR ALLOCATION OF COST RECOVERY

Considerations for revising User Types

User Type	NEW: Lite File T+0	Daily Delta File	NEW: Weekly Delta File (every Sat)	Weekly 'Snapshot' (Full FDL) (every Sat)	Automated FDL Access	Number of ISIN Creates	Number of UPI Creates
Registered	Y	N	Y	N	N	N/A	N/A
NEW: Full FDL	Y	Y on T+0	Y	Y	Y	N/A	N/A
Infrequent	Y	N	Y	N	Y	100 per invoicing period	12 per invoicing period
Standard	Y	Y on T+0	Y	Y	Y	5000 per invoicing period	600 per invoicing period
Search-Only	Y	Y on T+0	Y	Y	Y	N/A	N/A
Power	Y	Y on T+0	Y	Y	Y	Cap subject to AUP	6000 per week

The use of the DSB's GUI remains available to all user types including Registered Users

Key:

Green:

Red:

New features / additions
Amended features

8.1. FAIR ALLOCATION OF COST RECOVERY: Q1

Fair Allocation of Costs

Q1.1: Do you support a holistic review of the DSB user model rather than isolated changes?

Q1.2: What would improve fairness, transparency and protect against potential free-rider behaviour?

Q1.3: Are there user groups that you believe would be disproportionately impacted by introduction of the Full FDL User Type, delaying free access from T+1 to a Weekly Delta file?

Q1.4: Do you consider changes are required to other User Types?

Timing and Business Dependency

Q1.5: What is deemed as fair timeframe for free access to DSB Data if fee-paying receive T+0?

Implementation and readiness

Q1.6: What lead time would be needed to adapt systems and processes for a change in FDL availability?

Q1.7: What connectivity types are required based on functionality needs?

Q1.8: Any implementation considerations the DSB should be aware of?

8. II. TIERING OF DISTRIBUTOR USER TYPES

Background

- The Distributor user type was introduced on 1 January 2026 with a flat fee of €20,000 (UPI) and €15,000 (OTC ISIN), on the basis that further analysis and refinement of the fee model would follow.

Distributor quarterly reporting Q1 2026 – Initial Findings

- Higher uptake of Distributors across both UPI & OTC ISIN services than originally estimated indicating strong early adoption and relevance of the model.
- Increased reach to non-fee-paying users with 300+ downstream users identified via distributors. Confirms Distributors materially extend DSB data access beyond direct subscribers.
- Diverse end-user base across the ecosystem with buy-side, sell-side, banks, asset managers etc. demonstrating broad market dependency on DSB data via Distributors.
- Incomplete reporting, data gaps and confidentiality concerns regarding sharing end user information limits available insights.
- Distributor model is validated (broadening access and cost allocation) but there is insufficient data for a robust tiering model.

Proposal

- The DSB proposes to further engage with industry to collate and analyse more data before proposing a tiering model for Distributor fees.
- Areas of exploration include: the role of Distributors and third-party service providers more generally, methodology for fair Distributor fee model tiering, consideration of confidentiality concerns, and mitigating free rider issues across users.

8.II.TIERING OF DISTRIBUTOR USER TYPES: Q2

Q2.1: Does the proposed expanded definition of Distributor (including derived, validation and display use cases) appropriately capture distributive use of DSB Data?

Q2.2: Do you agree that number of end users is the most appropriate primary metric for Distributor fee tiering? Why or why not?

Q2.3: Which, if any, additional metric(s) would best complement end user numbers:

- **No additional metrics required**
- **End user composition (fee paying vs non fee paying)?**
- **Type of data distributed (raw versus enriched, derived, validation, display)**
- **Redistribution rights (No redistribution, limited redistribution (named end users), broad redistribution)**
- **Geographic scope (single jurisdiction, regional (EU, UK, APAC, Americas))**
- **Firm metrics (number of employees, revenue)**
- **Another metric not considered?**

8.II.TIERING OF DISTRIBUTOR USER TYPES: Q2 CONT.

Q2.4: Regarding quarterly reporting and confidentiality, are there alternative validation mechanisms that could meet the DSB's needs without reducing trust?

Q2.5: Would a clearly defined default to highest tier option be an acceptable alternative for Distributors unable or unwilling to disclose end user details?

Q2.6: Would publication of registered Distributor names increase trust and market clarity?

Q2.7: Is there interest in a Distributor and Intermediary (third party service providers) engagement forum or partner programme to support ongoing engagement and discovery? Please indicate if you wish to engage with the DSB directly on discussions relating to third party service providers.

Q2.8: Do you have any other comments on the Distributor model that the DSB should consider?

8.III.ACCEPTABLE USAGE POLICY BREACHES

Background

- API users who repeatably breach DSB Acceptable Usage thresholds require extra monitoring and support, as a result additional costs are incurred.
- The majority of Acceptable Usage breaches arise from repeat breaches of invalid message thresholds, typically driven by underlying data quality issues rather than misuse of the service.
- The TAC has proposed targeted technical refinements to reduce breach volumes and associated monitoring and support costs.

Proposal

- Update classification logic so that certain invalid data submissions (e.g. incorrect or non-valid ISINs that fail validation) are counted towards a user's Create or Search limits rather than being categorised as Invalid Messages.
- Encourage users to undertake pre-validation checks on data prior to submission.
- Enhance response messages to make errors clearer, more specific and more actionable, enabling users to identify and correct underlying issues before resubmission.
- Costs for 2027 are €63k (UPI Service = €42k, OTC ISIN Service = €21k) which includes Financial Sustainability Margin @ 20% and excludes any annual inflationary uplift. There are no ongoing operational cost impacts from 2028 onwards.

Q3: Do you agree with the proposal for targeted refinements to reduce Acceptable Usage breach volumes and associated monitoring and support costs?

8. IV. ALTERNATIVE IDENTIFIERS IN THE UPI SERVICE

Background

- The Alternative Identifier functionality was included at the launch of the UPI Service in October 2023 to support regulatory compatibility and interoperability, as referenced in the CPMI IOSCO UPI Technical Guidance.
- Alternative Identifiers CUSIP, SEDOL and FIGI are mapped to ISIN as the primary underlier identifier for Fixed Income and Equity instruments.

Usage Analysis

- 46 unique entities are enabled to use one or more Alternative Identifier with 21 unique entities utilising the functionality in 2025.
- Usage declined by 53% from 2024 to 2025 across all identifier types: CUSIP –30%, FIGI –41%, SEDOL –70%.
- Third-party data costs for this functionality are approximately €506,000 per annum (approx. 5% of UPI operational expenses).

Proposal

- The DSB proposes to review the Alternative Identifier functionality and its role within the UPI Service as part of cost recovery, considering the principles of fair and equitable cost allocation in any proposals.
- The DSB will initiate engagement with ROC/CDIDE to validate whether ongoing provision of Alternative Identifiers in their current form is considered a regulatory essential and that any proposed change in approach remains aligned with expectations of the UPI Governance Arrangements.
- Targeted consultation will be undertaken with permissioned users to understand actual market demand and willingness to move to alternative cost models (e.g. user-pays).

8.IV.ALTERNATIVE IDENTIFIERS IN THE UPI SERVICE: Q4

Q4: Do you have any feedback on the existing Alternative Identifier functionality for the DSB's consideration?

Q4.1a: Are you familiar with the Alternative Identifier functionality?

Q4.1b: Do you recommend inclusion of other Alternative Identifiers not currently available, or requirements for specific underlier scope or coverage extension?

Q4.1c: Are there any improvements that would increase the utilisation of the Alternative Identifier functionality?

Q4.2: Would you support a review of whether the Alternative Identifier functionality remains within cost recovery?

8.V. BILATERAL ENGAGEMENT WITH DSB: Q5

- This year's consultation marks an important shift for the DSB as it begins a new, discovery led phase of engagement to deepen its understanding of its users and the broader ecosystem in which they operate.
- The goal of this shift is to gather insights that ensure DSB services continue to evolve in step with the needs of the market.
- In line with this goal, the DSB propose to undertake further engagement over the course of this year to better understand the usage of data, the different user needs and application of the Distributor model, prior to making proposals. The DSB welcomes insight from a broad and varied range of users across DSB user types, organisations and regions to ensure diverse representation.

Q5: Would you be willing to discuss with the DSB on a bilateral basis your firm's usage of DSB Data and associated workflows to assist with this discovery phase?

9. ANY OTHER COMMENTS

This section is an opportunity for respondents to provide feedback and commentary on any other aspects they believe should be considered.

10. INDUSTRY CONSULTATION TIMELINE

Milestone	Date
Publication of DSB OTC ISIN, UPI and CFI Consultation Paper (CP)	Thu 30 Apr 2026
DSB Annual Industry Consultation Overview Webinar	Thu 13 May 2026
Industry feedback period on the CP	Thu 30 Apr – Fri 29 May 2026
DSB TAC Industry Consultation Meeting	Wed 17 Jun 2026
Final Consultation Report publication	Tues 21 Jul 2026
2027 Draft User Agreement (UA) publication	Tues 4 Aug 2026
Deadline for industry feedback on proposed UA changes	Thu 27 Aug 2026
2027 Final User Agreement UA publication	Thu 24 Sep 2026
User termination deadline	Thu 1 Oct 2026
Annual User fee determination for 2027	Fri 2 Oct 2026
2027 User fees published	Wed 7 Oct 2026

II. FORMAT FOR INDUSTRY RESPONSE

- Designed to consolidate industry feedback in a scalable manner
- Consultation responses to be completed using the form available [here](#) and emailed to industry_consultation@anna-dsb.com
- Stipulate whether the respondent wishes the response to be treated as anonymous. Note that all responses are published on the DSB website and are not anonymized unless specific requests are made
- Where applicable, responses should include specific and actionable alternative solution(s) that would be acceptable to the respondent in order to ensure that the DSB can work to reflect the best target solution sought by industry as a whole (within the governance framework of the utility)
- **Responses must be received by 4pm UTC on Friday 29 May 2026**
- Consultation related queries can be directed to industry_consultation@anna-dsb.com

Q&A

I 2. FURTHER INFORMATION

- DSB Main Terms and Policies: <https://www.anna-dsb.com/dsb-policies/>
- Product documents, user notifications, FAQs & operational status: <https://www.anna-dsb.com/>
- Industry consultation reports and feedback: <https://www.anna-dsb.com/industry-consultation/>
- Third Party Assurance Audit: <https://www.anna-dsb.com/third-party-assurance-audit/>
- Fee Model Variables: <https://www.anna-dsb.com/fee-model-variables/>
- OTC ISIN Fees & Rules: <https://www.anna-dsb.com/fees-rules-2025/>
- UPI Fees & Rules: <https://www.anna-dsb.com/upi-fees-rules-2025/>
- Best Practice Guidelines: <https://www.anna-dsb.com/download/upi-and-isin-best-practice-faqs/>
- Technical documentation: <https://github.com/anna-dsb>
- Unique Product Identifier (UPI) latest information: <https://cosp.anna-dsb.com/home>
- Details here for OTC ISIN registration: <https://www.anna-dsb.com/ISIN>
- General questions: <https://www.anna-dsb.com/contact-us/>

Thank you!