

Committee of European Securities Regulators  
Submitted via [www.cesr.eu](http://www.cesr.eu)

## **Call for evidence on the technical standards to identify and classify OTC derivative instruments for TREM**

London, February 27, 2009

Dear Sirs,

Markit welcomes the publication of CESR's Call for Evidence on the *Technical standards to identify and classify OTC derivative instruments for TREM* and we appreciate the opportunity to provide you with our views on this topic.

Markit is a financial information services company with over 1,100 employees in Europe, North America and Asia Pacific. More than 1,500 institutions use our independent services to value financial instruments, manage risk, improve operational efficiency and meet regulatory requirements. Markit has owned and operated RED, the Reference Entity Database providing market standard identifiers for credit derivatives, for many years and we have also gained extensive experience in creating identifiers for other asset classes such as commodities or loans. We therefore feel well placed to comment on issues related to identification and classification of OTC derivatives for the purpose of your Trade Reporting Mechanism TREM.

### **General comments**

Creating identifiers for financial products is all the more complex the less standardised the products are. As flexibility is one of the main features that OTC derivatives offer to their users, this market by its very nature does not use fully standardised contracts. Even if the legal definition of terms might often be standardised based for example on ISDA definitions, the