



Digital Token Identifier Foundation

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Re: RIN number 3038-AF43 – Financial Data Transparency Act Joint Data Standards Rulemaking

Submitted by web [forms](#) per [Federal Register instructions](#)

The [Digital Token Identifier \(DTI\) Foundation](#)¹ and its Product Advisory Committee (PAC) welcome the opportunity to respond to the nine Federal agencies' ('The Agencies')² [Proposed Rule on Joint Data Standards under the Financial Data Transparency Act of 2022](#) (FDTA). Our comments refer to the use of International Organization for Standardization (ISO) standards as common identifiers in the proposed rule. We propose the ISO 24165 Digital Token Identifier (DTI) standard is also considered by the Agencies as a common identifier that satisfies the requirements set out in 124(c)(1)(B) of the Financial Stability Act, to support the unambiguous identification of digital assets represented on distributed ledger or similar technology.

The DTI Foundation welcomes the principles to align the Proposed Rules with internationally recognized and adopted ISO standards, such as the ISO 17442 Legal Entity Identifier (LEI), ISO 4914 Unique Product Identifier (UPI), ISO 10962 Classification of Financial Instruments (CFI), ISO 8601 Date and Time Format, and ISO 4217 Currency Codes. As outlined by the proposed rule, these international standards are complementary in nature, widely used, interoperable, and incorporated into other data standards.

The ISO 24165 DTI standard is recognized as the global standard for the identification of digital tokens, including security tokens representing financial instruments in tokenised form, other real-world asset backed tokens such as fiat-backed stablecoins, and the wider universe of unbacked crypto-assets. The DTI standard is being increasingly adopted by market stakeholders and recognized by regulators across various digital asset markets for a range of use cases, in various jurisdictions:

¹ The DTI Foundation is a non-profit division of Etrading Software Limited: <https://etradingsoftware.com/>

² Office of the Comptroller of the Currency (OCC), Treasury; Board of Governors of the Federal Reserve System (Board); Federal Deposit Insurance Corporation (FDIC); National Credit Union Administration (NCUA); Consumer Financial Protection Bureau (CFPB); Federal Housing Finance Agency (FHFA); Commodity Futures Trading Commission (CFTC); Securities and Exchange Commission (SEC); Department of the Treasury (Treasury).

- Embedded in UPI (which is included already in the Proposed Rule) and OTC ISIN data structures to report underliers for crypto-derivative transaction regulatory reporting across the G20.
- Proposed by the US Internal Revenue Service to identify digital asset proceeds for broker transactions.
- Required for data reporting to Canadian Securities Administrators (CSAs) by crypto-asset trading platforms.
- Mandated as the crypto-asset identifier under the European Union's Markets in Crypto Assets Regulation (MiCA) stablecoin issuer and crypto-asset service provider data requirements.
- Proposed by the European Securities and Markets Authority (ESMA) to be used alongside ISIN, the instrument identifier used in the EU and UK for regulatory reporting for all asset classes, for all DLT-based financial instrument transparency reporting and order book record keeping in the EU, to unambiguously identify the tokenised financial asset as well as the underlying DLT.
- Embedded within financial messaging protocols and infrastructure, among other uses shared on the DTI Foundation's Integration and Adoption webpage.³

As the Registration Authority for the DTI ISO standard, the DTI Foundation follows strict ISO governance requirements of fair, reasonable, and non-discriminatory (FRAND) principles. The DTI is open and may be freely reproduced, distributed, transmitted, or otherwise used by anyone for any purpose, commercial or non-commercial at no cost.

The DTI Product Advisory Committee (PAC) as the core governance committee provides stewardship and oversight to the implementation of the ISO 24165 standard. The DTI PAC currently comprises over 25 members representing a cross-section of crypto and digital asset market stakeholders, including global institutional investors, standard-setting bodies, academics, asset managers and market infrastructure providers from various regions globally. The list of DTI PAC members is available on the DTI Foundation webpage⁴.

We are available to answer any questions you may have and would welcome the opportunity to discuss the ISO 24165 DTI standard further with the Agencies. Please do not hesitate to contact us at secretariat@dtif.org.

³ Snapshot of DTI Implementation and Adoption

⁴ <https://dtif.org/product-advisory-committee/>

About the DTI Foundation

The DTI Foundation is the Registration Authority for the International Organization for Standardization (ISO) 24165 Digital Token Identifier (DTI) standard, an ISO standard that enables the unique identification of all fungible digital assets which use distributed ledger technology (DLT) for token issuance, storage, exchange, a record of ownership, or transaction validation. The DTI itself comprises a code - a random, unique combination of nine alphanumeric characters allocated to a crypto asset - and a record of data relevant to that token (the reference data), which is held by the DTI Foundation. The reference data provides information about the DLT on which the token is deployed, as well as token technical attributes (such as address, name(s) and any external identifiers).