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To: MARKT COMPLAW

Subject: Consultation reply Interconnection of Business Registers - Registered Organization

Registered ID 82496732931-84.

Thank for providing us the opportunity to respond to the Green Paper.

We have a number of points we would like to convey.

Global Business Register Ltd. is in the business of providing corporate information to the public, both companies and individuals. We purchase information directly from companies registers across the world and send it across the Internet to our end users. Our business model is entirely electronic. Our main supplier is the EBR.

Some important feedback we have received from our clients is as follows:

1. Availability of information via the EBR is not good enough as compared to that available on the websites of each of the national companies registers. It is substantially less in many cases. Customers want the same information to be available. They are not so concerned about standardisation. They want access to the underlying information contained in the registers databases.
2. We agree with the concept of making legal and financial data available through the same source
3. Participation by all EU states must be mandatory and at a level where the service provided is at least equal to that provided on the national website.
4. All documents (pdfs / tiffs etc) should be digitally signed by the originally submitter and by any intermediate that handles or stores them. This is to guarantee legitimacy and security.
5. The operation of the service should be multilingual to support European languages
6. Any on-line documents such as the Company Profile from the EBR should be based around the maximum dataset available for a company/jurisdiction and presented according to an agreed standard, such as XBRL.
7. Service levels i.e. opening hours etc. should be consistent across registers. Support for help incidents should be available within a defined timescale according to an agreed standard.
8. Operating standards must be regularised. For example, search algorithms must be made consistent across registers, document naming conventions must be standardised etc.

Since we started dealing with EBR our feeling is that each of the registers does not treat dealing with its international customers on the same terms as their national customers. In other words, national customers are more important. We are saying that this mindset must change. Every customer, national or international, must be treated equally on every level and most importantly all the data in the register must be made available to all customers.

We are not sure whether this is, or is not, the case but there would appear to be an extreme reluctance on the part of some registers to actively promote inter-register and pan-European cooperation. Whether this is because of budgetary concerns, increased workload, language barriers, reluctance to change long established processes, we are not sure. However, we are certain that there is a reluctance to engage.

It is our firm opinion that unless it becomes obligatory then there will be little change in the level of service. We would hope that it would be enshrined in EU law and that minimum standards are set that compel member states to provide services. Member states should have an input into the process but they should not be left to decide how it works. In many cases, if the parties themselves are left to decide, decisions tend to be made that centre around the lowest common denominator which will not be up to the required level of service to make the network work optimally.

We look forward to answering any queries that you may have.

Yours sincerely,

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