



EUROPEAN CENTRAL BANK
BANKING SUPERVISION

Template for comments

Public Consultation on Money Market Statistics Regulation

Institution/Company

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General comments

Template for comments

Public Consultation on Money Market Statistics Regulation

Please enter all your feedback in this list.

When entering feedback, please make sure that:

- each comment deals with a single issue only;
- you indicate the relevant Article/Annex, where appropriate;
- you indicate whether your comment is a proposed amendment, clarification or deletion.

Deadline: 10 September 2018

ID	Article, annex and/or table of the draft regulation	Page	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board
1	Article 3, Paragraph 1	3	Clarification	We understand the first sentence - referring to the reporting agents "should report to the NCB of the ...including all of their Union and EFTA located branches,..." - has not changed compared to the existing version. Nevertheless, we wanted to draw your attention to a (potential) impact of the BREXIT: the UK will leave the Union, and would not become part of EFTA, as a result this means that as from April 2019 reporting parties are required to no longer report any MMSR eligible transaction that is executed by their London branches. We just wanted to be certain ECB was aware of the fact.	MMSR eligible reporting population will evolve with the BREXIT.
2	Annex 1, Part 2	7	Amendment	TYPE OF DATA: field "Related Proprietary Transaction Identification": we notice this field becomes mandatory "where applicable" and wanted to explain that – on a novation – the "step-in" party would not have a "prior" transaction identification since they enter into a new transactions through the process of Novation. So they cannot populate this field, although they would mark the transaction is a result of a Novation.	Reporting Agents won't be able to report correctly if the field "Related PTI" becomes mandatory for Novations.
3	Annex 1, Part 2	8	Amendment	TYPE OF DATA: field "Reference Rate Index": we notice ECB expects ISIN – we just wanted to raise the fact that most reference rates can also be identified through their name since not all indices have ISINS yet – ESMA also accepts names.	Not all the Rate Index have ISINs, how do we have to report them?
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