



# FX Initiatives Update

#### ECB FX Operations Managers Group 15 November 2011

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# Agenda

#### • FX Derivatives Trade Repository

- LEI Legal Entity Identifiers
- Netting position confirmations update
- SSI distribution messages update
- Consolidated CLS fund manager reporting



## AFME Global TR current status

- Proposed delivery phases
  - Phase 1 Q2 2012, end of day snapshots
  - Phase 2 Q4 2012, intra-day PET and Confirmation data
  - Phase 3 2013, real-time reporting
- 'Native' data submission interfaces
  - FPML (v5.3)
  - CSV files
  - GUI
- Key industry challenges
  - UPI, USI, LEI
  - Collating data fields required under D-F
  - Managing global vs. local requirements



#### FX TR –solution summary



# SWIFT assumptions re. data submission

- Flexible solutions required to meet varied needs
  - FPML direct from reporting party
    - Across all derivative classes
  - Utilise existing SWIFT MT3xx confirmations
    - SWIFT already carries traffic for ~70% of FX derivatives
      - MTs
      - CLS (MT & Interact)
      - ISO20022 (CLS2)
  - Secure file submission
  - Optionally also pre-submission matching
- Consistent approach required across TRs



#### FpML over SWIFT



SWIFT FpML service live since 2008.

FpML messages (XML syntax) are transported using the SWIFT InterAct store and forward service.

SWIFT can provide validation, authentication non-repudiation and guaranteed delivery, for all transported messages.

Standard solution for all OTC derivative classes.

#### Utilisation of existing MT3xx confirmations



FINInform automatically copies specified message types and forwards them to one or more selected destinations. Rules can be defined to provide specific filtering on copy selection.

MT3xx can be enhanced to support LEI, UPI, USI etc.

No action or internal development required from either the sender or the receiver and no operational impact on them.

Conversion to FpML can be provided before submission to the TR

Accord matching could also be provided.

#### File submission via FileAct



Can be used for submission of snapshot files as well as valuations.

Highly resilient & reliable
Secure
Global reach
Easy implementation
Open format
Cost effective



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## Legal Entity Identifier - Objectives

- 1. Define a universal standard for identifying parties to financial contracts
  - To reduce cost of data reconciliation and ensure data consistency
  - To facilitate aggregation of positions and risk monitoring
  - To standardise transactions reporting
- 2. Respond to requirements from global regulators
  - European Commission Mifid, Emir
  - European Securities and Markets Authority (ESMA)
  - Office of Financial Research (OFR)
  - Commodities Futures Trade Commission (CFTC) Trade Repositories / OTC Derivatives





#### ISO 17442



- New standard
  - No existing standard match requirements
  - Scope, Definition, Rules
  - Syntax
  - Registration Authority appointment
  - Draft International Standard = ISO 17442
  - Structure
    - 18!an
    - 2!n (check digit)
- Final: January 2012





#### LEI Data Attributes

#### **Core LEI Record Attributes – Public database**

Record creation date – Valid from date

Last update date

Record validation date (Quality assessment)

Expiry date of the record (when applicable)

Status (active, dissolved, etc.)

LEI code

Registered name (Exact official name)

Address (Registered)

Jurisdiction of registration – Country

Legal form

#### Additional LEI Record Attributes

Ultimate parent LEI (hierarchy)

Immediate parent LEI (hierarchy)

Alternate trading / short name



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#### Business model

- Guiding principles
  - Financial industry  $\rightarrow$  LEI utility
  - Regulators  $\rightarrow$  Non profit
  - ISO  $\rightarrow$  Cost recovery
  - Free access to the database
- Phases
  - Implementation and ramp-up = cost sharing model
  - Maintenance = registration fee
  - Added value services





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# Background & History 1 of 2

- SWIFT Standards received request for a new message 'FX netting position advice' from CH July 2010. Similar requests also received by the SWIFT marketing team.
- Following discussions with Bank of England FX Operations Managers Group (BoE JSC OMG), a working group was formed to assess the need.
- During these working group meetings:
- decision for MT rather than XML
- requirements were discussed and together with SWIFT Standards a preliminary message specification was created.

BoE JSC OMG FX Netting Position Working Group Participants:			
Barclays	Citi	Credit Suisse	Deutsche
Goldman Sachs	HSBC	JP Morgan	Morgan Stanley
Nomura	Rabobank	RBS	UBS



# Background & History 2 of 2

• June 2011 SWIFT board agreed message development project to go ahead.

(Decision to put the new MT on SWIFT network is decided by a SWIFT country vote in the September 2011 timeframe.)

• SWIFT FX Netting Position Advice Message MT Working Group convened.

(User Group Chairpersons of countries with highest usage of categories 3 and 1 message types were requested to provide delegate/s to represent her/his country in the SWIFT message specification working group.)

- September/October 2011 proposal circulated for country voting and approval received
- November 2011- advance information published on swift.com





#### Business Context

- Banks currently bilaterally agree net positions using manual means.
  - N.B. only relevant for trades & instruments that don't settle in CLS.
- Consensus that standardization and automation of this process would bring both operational and control benefits.
- Banks generally have between 0.5 and 1.0 FTE devoted to bilateral netting of positions with the other top 15 banks.
- Banks with corporate clients have up to 10 FTE focused on agreeing netting positions.
- Elimination of effort and associated operational risk is highly desirable.

SWIFT receiving similar requests for information from the buy-side



#### Example usage

SWIFT

Scope: the MT 370 Netting Position Advice message is sent by a financial or nonfinancial institution to another financial or non-financial institution. It is used to advise the netting position of a currency resulting from foreign exchange, non deliverable forward (NDF), options and other trades. It also specifies the settlement information for the currency.



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## Driver for change - background

- May 2009 FXAG requirement for an SSI update message:
  - Authenticated
  - Structured
  - Validated
  - Distributed
  - Over FIN (owing to reach)
- Existing solutions do not meet requirements
  - E.g. MT074 is not authenticated, structured or validated
  - ➡ Industry cost savings



SWIFT

#### MT670/1 Solution overview





#### Key features

- Distribution to: •
  - List of BICs (up to 100) or
  - List of countries (up to 80) or
  - All BICs on network
- Multiple SSIs per message
- Can be sent 'on behalf of'
- Supports all 'cash' business lines
- On network from November 2011 •
- SSI support in broadcast (MT074) will be removed in 2013





#### Standardising repository communications





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#### IMI CLS submission and reporting – Today



#### IMs have requested consistent status reporting from their Custodians

#### Standardised industry Solution – MT 396



Custodians send MT 396 to IMIs. Solution already in use today. SWIFT working with industry to define standard usage for MT396.





