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Feedback to consultation paper

Document Title	T2S Consultation Paper: Principles and High Level Proposals
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Proposal Nr.	Statement	Comment	Institution	Confidential
1	I agree	In this context support of the end-investor account structure is considered as important to a level playing field.	ESBG	No
2	I agree	It is essential that sub-accounts dedicated to securities can be used.	ESBG	No
3	I agree		ESBG	No
4	I agree		ESBG	No
5	I agree		ESBG	No
6	I do not agree entirely	Users who maintain accounts with 2 or more CSDs must be able to consolidate their securities positions	ESBG	No
7	I agree		ESBG	No
8	I agree	It is noted that this proposal is high-level, and that the different roles still need to be precisely defined.	ESBG	No
9	I agree		ESBG	No
10	I agree	It is noted that the account structure will be the object of a dedicated market consultation at a later stage.	ESBG	No
11	I do not agree entirely	The reference data is required not only for settlement and auto-collateralization, but also for all account management tasks to be performed by a participant	ESBG	No
12	I agree		ESBG	No
13	I agree		ESBG	No
14	I agree		ESBG	No
15	I agree		ESBG	No
16	I agree		ESBG	No
17	I agree		ESBG	No
18	I do not agree entirely	We would submit that Proposal 18 is beyond the scope of T2S - notably as recalled under Principle 3	ESBG	No
19	I agree		ESBG	No
20	I agree	It is recommended to make paragraph 2 ("Harmonization of opening hours is a precondition for equal treatment of CSDs...") a distinct Proposal, as it is a critical matter.	ESBG	No

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21	I agree	It is assumed at this stage that the processes that will support night-time settlement will be the object of a separate consultation. Also see comment on Proposal 23 below.	ESBG	No
22	I agree		ESBG	No
23	I do not agree entirely	Having several CSDs not offering night-time settlement is likely to create a sub-optimal situation for the market as a whole, not only for the users of these CSDs. Therefore any CSD's decision not to offer night-settlement should be the result of a wide and transparent user consultation process.	ESBG	No
24	I agree	Domestic and internal cross-border deadlines must not differ.	ESBG	No
25	I agree		ESBG	No
26	I agree		ESBG	No
27	I agree		ESBG	No
28	I do not agree entirely	Users should have the possibility to enter new instructions also throughout the night (except of course for maintenance windows)	ESBG	No
29	I agree		ESBG	No
30	I do not agree entirely	A process for gradually bringing all matching into T2S should be defined with the market	ESBG	No
31	I do not agree entirely	A governance and a process for maintaining the "ECSDA Report" must be defined and agreed with market participants	ESBG	No
32	I agree		ESBG	No
33	I do not agree entirely	See remark to Proposal 31	ESBG	No
34	I agree		ESBG	No
35	I do not agree entirely	Instructions should be enriched prior to matching being attempted. Once matched no enrichment should take place.	ESBG	No
36	I agree		ESBG	No
37	I do not agree entirely	A functionality allowing for chaining, linking, blocking as well as unblocking should be provided as well.	ESBG	No
38	I agree		ESBG	No
39	I do not agree entirely	Where (paragraph 2) specific functionalities are provided (such as imposed by different legal set-ups) their effect must be the same, and the playing field not distorted.	ESBG	No
40	I agree		ESBG	No
41	I agree		ESBG	No
42	I agree		ESBG	No
43	I agree		ESBG	No
44	I agree	We expect the algorithm to be the object of a consultation at a later stage.	ESBG	No
45	I agree		ESBG	No
46	I agree		ESBG	No
47	I agree		ESBG	No

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48	I do not agree entirely	A single rule cannot apply. A distinction will have to be made in function of the type of instructions and the type of risks of the underlying asset. For some a deadline should be set after which recycling will not be attempted any longer. We would expect this matter to be the object of a specific consultation at a later stage.	ESBG	No
49	I agree		ESBG	No
50	I agree		ESBG	No
51	I do not agree entirely	Whilst we fully support Principle 12, we'd require additional views as to how the Eurosystem envisions to prevent that the provision of cross-border links to non-participating CSDs results in a disincentive for CSDs to join.	ESBG	No
52	I do not agree entirely	A minima user interfaces must also allow for viewing their consolidated securities and cash positions	ESBG	No
53	I agree		ESBG	No
54	I agree		ESBG	No
55	I do not agree entirely	Beyond the technical consideration contained in this Proposal, it is essential that transparent and as harmonized as possible criteria are established for users to access T2S directly. The process and governance for maintaining these criteria should be facilitated by the Eurosystem.	ESBG	No
56	I agree	See also remark to Proposal 28 above.	ESBG	No
57	I do not agree entirely	Users must have unrestricted access to reports and information throughout the T2S operating cycles.	ESBG	No
58	I agree		ESBG	No
59	I agree		ESBG	No
60	I do not agree entirely	We would need to understand the assumptions leading to such figure, which flexibility for growth or contraction the system will allow without re-engineering, and whether this figure takes into account market structure and evolution beyond 2013.	ESBG	No
61	I do not agree entirely	Same remark as above	ESBG	No
62	I agree		ESBG	No
63	I agree		ESBG	No
64	I agree		ESBG	No
65	I agree		ESBG	No
66	I do not agree entirely	The working assumption would be that migration will be infrastructure by infrastructure. However this assumption must be validated through further analysis. It will be necessary to take into consideration progress made by local markets and National Central Banks, and avoid distortions. It is too early for a conclusion on this matter.	ESBG	No
67	I do not agree entirely	It is recommended to consider applying the "user pays principle" to functionalities supporting optional services.	ESBG	No