

Feedback to consultation paper

Document Title	T2S Consultation Paper: Principles and High Level Proposals
Document Reference	070323_note_ConsultPrincipalsProposals_v0.98.doc
Issued for review	26.04.2007
Deadline for review	27.06.07

Proposal Nr.	Statement	Comment	Institution	Confidential
1	agree		UBS AG	No
2	do not agree entirely	We do not see reasons for splitting cash liquidity between RTGS account and special sub-cash accounts	UBS AG	No
3	agree		UBS AG	No
4	agree		UBS AG	No
5	agree		UBS AG	No
6	agree		UBS AG	No
7	agree	Market participants should be able to exercise a choice with regards to whether they utilise Omnibus accounts or set up final beneficiary accounts.	UBS AG	No
8	agree	This structure should not be mandatory and where market participants cover several of those roles they should be able to operate only one main account.	UBS AG	No
9	agree		UBS AG	No
10	agree		UBS AG	No
11	agree		UBS AG	No
12	agree		UBS AG	No
13	agree		UBS AG	No
14	agree		UBS AG	No
15	agree		UBS AG	No
16	agree		UBS AG	No
17	agree		UBS AG	No
18	agree	We would like to emphasize that it is in this context of utmost importance that the Giovannini Barriers 4 & 7 (10 decided ECSDA/EACH Standards) will be eliminated.	UBS AG	No
19	agree		UBS AG	No
20	agree		UBS AG	No
21	agree		UBS AG	No
22	agree		UBS AG	No
23	completely disagree	Night time settlement should not be optional. For the sake of efficiency and faster turnover across borders, all CSDs should participate in night-time settlement. This is also covered by Giovannini Barrier 4 & 7 respectively.	UBS AG	No
24	agree		UBS AG	No
25	agree		UBS AG	No
26	agree		UBS AG	No
27	agree		UBS AG	No
28	agree		UBS AG	No
29	agree		UBS AG	No
30	completely disagree	Transactions from Stock Exchanges (trading platforms) which are matched at CCPs should enter directly as locked-in trades into T2S. However, OTC transactions need to be matched in T2S. To ensure consistency, there should be no matching at the CSDs.	UBS AG	No
31	agree	It should be noted however, that the harmonised set of matching rules should not go down to level to include restrictive or complex market specifics.	UBS AG	No
32	agree		UBS AG	No
33	do not agree entirely	A review is required of the ECSDA standards particularly in relation to binding versus unilateral cancellation.	UBS AG	No
34	agree		UBS AG	No
35	do not agree entirely	Need more clarity as to definition on enrichment. But the matching fields themselves as well as information regarding the investor (KYC rules) should not be allowed to change.	UBS AG	No
36	agree		UBS AG	No
37	agree		UBS AG	No
38	agree		UBS AG	No
39	agree		UBS AG	No
40	agree		UBS AG	No
41	agree		UBS AG	No
42	agree		UBS AG	No
43	agree		UBS AG	No
44	agree		UBS AG	No
45	agree		UBS AG	No
46	agree		UBS AG	No
47		We agree with the part related to CCP transactions. We do not agree for non-CCP transactions. There are both advantages (higher rates of settlement efficiency) and disadvantages (extra cost at each layer in the custodial chain) in partial settlement. It is important that for non-CCP transactions it should be possible to opt in or out of partial settlement at the level of the account in T2S. To be analysed in detail by respective Technical Group.	UBS AG	No
48	agree		UBS AG	No
49	agree		UBS AG	No
50	agree		UBS AG	No
51	agree		UBS AG	No
52	agree		UBS AG	No
53	agree		UBS AG	No
54	agree		UBS AG	No
55	agree		UBS AG	No
56	agree		UBS AG	No

RESTRICTED

Proposal Nr.	Statement	Comment	Institution	Confidential
57	agree	Paragraph 2 of the explanation contradicts to the statement in the proposal that the functionality is only available for CSDs	UBS AG	No
58	agree		UBS AG	No
59	agree		UBS AG	No
60	do not agree entirely	The statement should not indicate a particular volume. The proposed system will need to be able to cover the real capacity required as determined in due course.	UBS AG	No
61	do not agree entirely	The statement should not indicate a particular volume. The proposed system will need to be able to cover the real capacity required as determined in due course.	UBS AG	No
62	agree		UBS AG	No
63	agree		UBS AG	No
64	agree		UBS AG	No
65	agree		UBS AG	No
66	agree		UBS AG	No
67	completely disagree	Harmonisation should bring maximum benefit to the market and hence the solutions introduced should not be constrained by local/existing market practices. The harmonised standards should reflect best practice. In cases where harmonisation cannot be reached, the costs should be borne by the failing party.	UBS AG	No