



**EUROPEAN CENTRAL BANK**  
BANKING SUPERVISION

## Template for comments

### Public Consultation on Money Market Statistics Regulation

**Institution/Company**

**Contact person**

**Mr/Ms**

**First name**

**Surname**

**Email address**

**Telephone number**

Please tick here if you do not wish your personal data to be published.

**General comments**

Dear Sirs, thank you for the opportunity to comment on the proposed changes to the MMSR Regulation. In general we welcome all the amendments proposed. In particular, we consider that the identification of the counterparts using the LEI, where possible, will be .beneficious for all the process, encompassing the growing global use of the LEIs

Besides, we think it is adecuate to extend the scope of transactions in order to include all types of financial entities regardless of their activity sector. This also reduces the possibility of omissions/overreporting due to mistakes in the categorization of the activity by the .different entities

We are fully committed to the compliance of this reporting to the ESCB, being aware of the transcendence of the information transmitted and its purpose. As such, we also want take the opportunity to kindly request that, in the next stages, the Reporting Instructions and Q&As are revised taking into account all the mismatches and known issues that have been encountered in the recent matching processes showing where possible clear(particularly in regards of the most conflictive fields -haircut; collateral and transaction nominal amount...-) and complete examples and criteria that allow the agents to report their transactions with the minimum space for interpretation. This will .truly contribute to considerably reduce the volume of mismatches and be welcome by all agents. Thank you