

## 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

XXXXXX welcome the amending regulation and appreciate that the most important features (including the timing for sending the daily files) will remain unchanged, avoiding additional IT upgrades. We propose 3 comments in order to obtain further clarifications and to be able to respect the deadlines that the coming regulation will impose to the reporting entities

# 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	1	4	Clarification	We totally agree in the inclusion of all financial counterparties but we think that only the definition won't be enough in order to guarantee the application of the correct criteria for the daily reporting. We expect for example that an ESA code list will be updated and for the specific situation of italian banks we will need also the transcoding with SAE code. We propose to give specific details also for reporting related to deals done with captive treasury entity within an international corporate group (the entity could be a separate one for organizational reason but under the relationship and commercial point of view the deals are considerate corporate and not financial). The enlarged exclusion will open on our opinion also to the possibility to have a larger number of transaction for the Euribor hybrid in case EMMI will confirm the transtion leveraging as much as possible on the same data sent by panel banks for MMSR reporting.	Update of current reporting
2	2	5	Clarification	The general indication that the amending regulation will come into force 20 days after the publication could generate problems for banks to be compliant in time, due to the very short notice. An indication of the expected date of the publication could really facilitate the planning of the activites for 2018/2019; on this regard, the new reporting instructions should be released as soon as possible.	Timing
3		1	Clarification	We would appreciate details explaining if - in case of reporting of deals done with an entity with no LEI code - the indication of sector and location has an impact on the full validation scheme. In other words: if a LEI will not be available, can we still indicate sector and location?	Validation Scheme
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