

Appendix 3 - Consultation Questions for Industry

Proposed Format for Industry Responses to the DSB Consultations:

- Consultation responses should be completed using the form below and emailed to industry_consultation@anna-dsb.com
- An option is provided for respondents to stipulate whether the response is to be treated as anonymous. Note that all responses are published on the DSB website and are not anonymized unless a specific request is made
- Where applicable, responses should include specific and actionable alternative solution(s) that would be acceptable to the respondent to ensure that the DSB can work to reflect the best target solution sought by industry (within the governance framework of the utility)
- As with prior consultations, each organization is permitted a single response
- Responses should include details of the type of organization responding to the consultation and its current user category to enable the DSB to analyse client needs in more detail and include anonymized statistics as part of the second consultation report
- Responses must be received by 5pm UTC on Monday 1st June 2020
- A webinar to address consultation related queries will take place on Thursday 7th May 2020. Register for the webinar [here](#).
- All consultation related queries should be directed to industry_consultation@anna-dsb.com

Respondent Details

Name	
Email Address	
Company	
Country	UK
Company Type	Multilateral Trading Facility (MTF)
User Type	Power
Select if response should be anonymous	X

Q#	QUESTION FOR CONSULTATION	PARTICIPANT'S RESPONSE
FUNCTIONALITY		
1	<p><u>Structured Communication Format to Aid User Automation and Digitization</u></p> <p>Question: Should the DSB introduce a structured communication format to improve users' operational efficiency? This would allow users to easily identify the nature of the notification and assign it to the appropriate internal team in an automated manner.</p>	<p>We generally agree though it is unlikely to increase our own operational efficiency</p>
2	<p><u>Create a New DSB User Type with "Search Only" API User</u></p> <p>Question: Should the DSB introduce the "Search-only API" type based on the details set out above, in order to enable a greater proportion of industry participants to utilize the DSB's services in a more operationally efficient and scalable manner? Please note that any fees earned from this service would be used to offset the annual fees payable by existing DSB users.</p>	<p>We generally agree though we would underline this be done in a cost-effective manner. While the introduction of a new user type makes sense, we hope this will not negatively impact those few entities required to create ISINs via API and who are thereby required to remain power users.</p>
3	<p><u>Provide One-Time Data Snapshots for Download</u></p> <p>Question: Should the DSB introduce a snapshot data provision service within the cost recovery ringfence, with any fees from the provision of such a service used to offset the fees payable by all other DSB users?</p>	<p>Similarly to our question provided in Question 2, we generally agree but the service should sustain itself i.e. users not needing the service should not be impacted. The service could be re-evaluated in a few years after having been made available.</p>
DATA SUBMISSION ENHANCEMENTS		
4	<p><u>OTC FISN Review</u></p> <p>Question: Does industry concur with the proposal to undertake a time-boxed piece of analysis that would seek to confirm a common</p>	<p>We agree that DSB should undertake the analysis</p>

Q#	QUESTION FOR CONSULTATION	PARTICIPANT'S RESPONSE
	view on the primary enhancements users wish to undertake.	
SERVICE AVAILABILITY		
5	<p><u>Multi-Cloud Configuration</u></p> <p>Question: Should the DSB perform a risk assessment on the current single cloud operations, together with a cost-benefit analysis of a potential move to a multi-cloud architecture?</p>	<p>We support DSB undertaking the analysis in 2021. However before proceeding, a clear risk to the services based on the use of one cloud provider should be defined and the option of a multi-cloud strategy an obvious mitigation. There are three Cloud providers that are of a maturity for an enterprise to use; Amazon, Google and MS Azure. There are fundamental differences between these three across each level of architecture and what works in one will not automatically translate to another. The cost therefore will be a significant ongoing management overhead in operating in a multicloud environment, which should not be greater than the risk it is designed to mitigate.</p>
6	<p><u>Single Active Region Risk Assessment</u></p> <p>Question: Should the DSB perform a risk assessment of its existing model of global connectivity from a single active geographical region, plus analysis of the costs and benefits of mitigating the identified risks?</p>	<p>There are multiple aspects to the risk of operating in a single region, such as reliability of communication providers, latency for those customers not in the region, dependency on a single datacentre provider and each should be understood clearly from the beginning. However, any single regional risk can be mitigated with a complete move to cloud and this should be considered alongside a move into additional regional datacentres.</p> <p>In addition, we would like to understand how much of this request comes from DSB as a UPI provider vs DSB as an ISIN provider. The single geographical connectivity option has been sufficient so far.</p>
USER AGREEMENT		
7	<p><u>DSB Governance Policy Dispute Resolution Mechanism</u></p> <p>Question: Does industry concur with updating the DSB Disputes and Resolution process to</p>	<p>We have no objection.</p>

Q#	QUESTION FOR CONSULTATION	PARTICIPANT'S RESPONSE
	arbitration, referring disputes to the London Court of International Arbitration (LCIA) and incorporating a small claims procedure?	
AOB		
8	Please use this space for any other comments you wish to provide	N/A