

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	Karel Engelen
Email Address	kengelen@isda.org
Company	ISDA
Country	
Company Type	Trade Association
User Type	Select Type
Select if response should be anonymous	<input type="checkbox"/>

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>	No response
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>If there is sufficient demand for this service and, as indicated, providing the service requires a one-time cost – split over 3 years – it would make sense to provide the service.</p> <p>Can the DSB specify how many sign-ups are needed for the service to be break even?</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>If the DSB determines there is sufficient demand to cover the cost of development and the ongoing yearly operations cost for this service, it should develop the service.</p> <p>The service should sustain itself i.e. the fees from the service should cover the capex of €210k and the yearly Opex of €131k. If this is not the case after a period of for example 3 years, the DSB should re-evaluate further support for the service.</p> <p>Any excess fees received for this service should be used to offset the fees payable by all DSB users.</p> <p>Can the DSB specify how many sign-ups will be needed for the service to be break even?</p>

Q#	QUESTION FOR CONSULTATION	PARTICIPANT'S RESPONSE
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 view on the primary enhancements users wish to undertake.</p>	<p>We agree with the proposal to undertake an analysis to improve the quality and usability of the FISN. We understand the current usage of the FISN for derivatives ISINs is driven by regulatory requirements. Any changes to the FISN itself of course will need to be coordinated with ISO.</p>
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>Yes, we support undertaking a risk assessment of the current single cloud operations together with a cost-benefit analysis of a potential move to a multi-cloud architecture.</p> <p>The risk assessment and cost-benefit analysis is proposed in the context of ISIN generation, which we support. The risk assessment and cost-benefit analysis will be equally, if not more relevant in the context of the DSB as issuer of the UPI as the UPI is expected to become a key reporting field in multiple jurisdictions across the globe.</p> <p>Can the DSB specify how they see the cost allocation happen across ISIN and UPI for this kind of work that will potentially benefit both standards?</p>

Q#	QUESTION FOR CONSULTATION	PARTICIPANT'S RESPONSE
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>We support a risk assessment of the current technology set up and the potential need to move towards a multi-region connectivity model with regional primary sites in light of the DSB's role of UPI service provider and the expected further increase and geographic dispersion of its users.</p> <p>Similar to the point raised in the previous question, we would like to understand how the DSB plans to allocate cost across ISIN and UPI for projects that would benefit both standards. While the cost recovery model for UPI is not yet known it is expected that there will be overlap in the user base of both standards but they will not be identical hence a different cost recovery basis is likely.</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 arbitration, referring disputes to the London Court of International Arbitration (LCIA) and incorporating a small claims procedure?</p>	<p>Has the DSB considered alternative seats to London for arbitration and alternative rule sets in other regions?</p>
AOB		
8	<p>Please use this space for any other comments you wish to provide</p>	