

ANONYMOUS Response to ANNA DSB Tech Consultation Paper 1:

ANONYMOUS requests anonymous treatment of the response contained herein.

Q1: The DSB proposes to allow the creation of ISINs for OTC Derivatives through the website. Do you think that ISIN generation should be possible over the web? If not, please describe your reasoning and provide evidence to support your points. the business use case to support your need.

We agree with the response detailed by ISDA.

Q2: The DSB proposes to use 0500 UTC to define the start of a new day. Do you think that this time is correct as the starting point for the new subscriptions for ISINs? If not, please explain your reasoning with evidence.

We agree with the response detailed by ISDA. We would also like to add that the eFX business day generally runs (and rolls) industry wide at 5pm EST.

Q3: The DSB will roll at the end of each day to perform housekeeping tasks etc. This means that all subscriptions and connections will need to be re-established each day. Does this model affect any key business requirements from the industry? If so, please explain including business use cases and any other evidence.

We agree with the response detailed by ISDA. We would like to add that the eFX business runs from 2pm EST Sunday until 5pm EST Friday. 24x6 is mandatory. Some emerging markets also trade on weekends so there should be a provision for access to data. Considering the solution is proposed to be in a cloud environment, something similar to Chaos Monkey should be consider to avoid any downtime.

Q4: The file download service permits users to retrieve all the ISINs created to-date. This data is split by asset class (as defined above in the 'file download' process description) and by date. Is this categorization sufficient to meet the industry's needs? If not, please explain, including business use cases and any other evidence.

We agree with the response detailed by ISDA.

Q5: Are there processes / use-cases that the DSB has not proposed above but are important to allow the industry to meet the regulatory requirements for ISINs for OTC derivatives? If so, please describe the business use case and explain and evidence why it is necessary.

We agree with the response detailed by ISDA. We would like to add that ANNA should consider a create or get request instead of requiring multiple calls to first check if an ISIN exists and then create it if it doesn't.

Q6: Do you know any products that cannot be represent using a JSON record? If so, please provide evidence to support your point.

We agree with the response detailed by ISDA.

Q7: As stated above, the DSB will provide access to the set of JSON templates through the File Download service. Will you require access to the templates via FIX or any other method? If so, please describe your requirement and provide evidence as to why it is necessary.

We agree with the response detailed by ISDA.

We agree with the response detailed by ISDA.

Q9: What functions / processes from those above would you want to test and in what order of priority?

We agree with the response detailed by ISDA.

Q11: Do you think the above approach for on-boarding stakeholders onto the UAT platform allows the industry sufficient scope to test and validate their connectivity and functionality before the regulatory deadline? If not, please suggest an alternative approach and why you consider it more suitable.

We agree with the response detailed by ISDA.

Q12: How many FIX connections / COMPIDs does your organization expect to establish with the DSB?

We agree with the response detailed by ISDA.

Q13: Currently, the DSB is not planning to conduct a coordinated UAT with multiple market participants interacting with the system simultaneously. Do you think a coordinated test would have value? If so, would you consider being part of such a test? Please explain your reasoning and what combination of tests you think would be important to conduct in such a scenario.

We agree with the response detailed by ISDA.

Q14: Do you agree with the assumptions made to infer the total number of messages sent by the DSB? If not, please explain your reasoning and provide evidence where possible.

We agree with the response detailed by ISDA. We find it difficult to confirm that the total volume of messages is accurate until we get further clarity on the Pre and Post trade ESMA requirements.

Q15: Do you agree that the cloud is the most appropriate approach for infrastructure implementation for the DSB? If not, please detail your objections and provide evidence where possible.

We agree with the response detailed by ISDA.

Q16: As stated above, the DSB is initially planning to use two or more datacentres located in different countries in Europe. Do you have any specific objections or concerns with this approach? If so, please detail your points and provide evidence where possible.

We agree with the response detailed by ISDA. We would like to second the requirement for a global rollout. Many firms utilise a follow the sun approach to their infrastructure and with global markets like FX, we have latency concerns if the datacentres are only located in Europe.

Q17: Is there a scenario where 1000ms is not a low enough latency threshold for the DSB to respond with an ISIN? If so, please provide the detail, including the business use case and the process steps to highlight the point at which the latency affects events.

We agree with the response detailed by ISDA.

Q18: Is there a scenario where a maximum time-lag of 1 minute to respond to a burst affects the ability of the market participant to proceed with its trading activity? If so, please provide the scenario detail.

We agree with the response detailed by ISDA.

Q19: Are there other performance and throughput variables that you feel aren't listed here and that will have a significant impact on cost or the service quality? If so, please list and describe them and their effect.

We agree with the response detailed by ISDA.

Q20: Are there market participants who must access the DSB outside of the hours specified above to meet the industry's immediate requirement? If so, please explain for what purpose and why this must take place outside those hours.

We agree with the response detailed by ISDA. Please see our comment on Q3.

Q21: If the view is to extend the availability hours to allow global access, we may need to extend the system hours to 24 x 5.5. This will increase the support cost of the utility. Please specify and demonstrate any business use cases that require the DSB, in this first phase, to be running and supported for 24 x 5.5.

We agree with the response detailed by ISDA.

Q22: Are there other availability variables that you feel aren't listed here and that will have a significant impact on cost or the service quality? If so, please list and describe them and their effect.

We agree with the response detailed by ISDA.

Q23: Do you think the DSB being implemented in the cloud will prevent your ability and/or willingness to connect to the service? If so, please explain and evidence your reasoning.

We agree with the response detailed by ISDA.

Q24: The DSB intends to execute 1,2 and 5 before launch and then conduct 3 on an annual basis. Do you think this provides a sufficient test of the system's defences against penetration? If not, please explain your reasoning and provide references to industry standards or best practices to support your response.

We agree with the response detailed by ISDA.

Q25: In addition, the DSB will execute a quarterly vulnerability scan or after any significant change. Do you think this frequency provides a sufficient test of the system's defences against penetration? If not, please explain your reasoning and provide references to industry standards or best practices to support your response.

We agree with the response detailed by ISDA.

Q26: Are there other security variables that you feel aren't listed here and that will have a significant impact on cost or the service quality? If so, please list and describe them and their effect.

We agree with the response detailed by ISDA. Our biggest concern is DoS attacks given our reliance on this server for most market activity. We request that the DSB detail how they plan to handle and recover from any attack.

Q27: The DSB is also investigating alternative connection types:

Leased line

Access via third party networks such as BT Radianz

Direct Cross-connect

Please indicate if any of these other options would be preferable to your institutions.

We agree with the response detailed by ISDA.

Q28: If you are considering a third-party network, which vendors are you considering? Please note that answers to this question will NOT be published – this question is to inform the DSB regarding any possible prioritization of third-party network connectivity.

We agree with the response detailed by ISDA.

Q29: Are there other connectivity variables that you feel aren't listed here and that will have a significant impact on cost or the service quality? If so, please list and describe them and their effect.

We agree with the response detailed by ISDA.

Q30: Is 7 years' audit log retention sufficient to meet your company data retention policy needs? If not, please explain why they should be stored for longer and provide evidence to your reply.

We agree with the response detailed by ISDA.

Q31: Is 7 years' audit log retention too long and therefore incurring unnecessary costs? If so, please explain why a shorter period is sufficient and provide evidence to your reply.

We agree with the response detailed by ISDA.

Q32: Currently, ISINs will be retained permanently and be available in the same way as a brand new ISIN. Is there an age at which an ISIN can be archived away from the main data set? If so, please explain your reasoning and the access requirement for such an archive.

We agree with the response detailed by ISDA. We would like to add that we have concerns with any archiving that removes the ISIN from primary datasets as it is difficult to guarantee that the trade won't be touched in our systems even after expiry. We propose either having a legacy archive which is only checked if the expiry has passed and the lookup fails or keeping a flag per ISIN that records the date it was last accessed. If the ISIN hasn't been accessed within a certain time period, it would be suitable for some kind of compaction.

Q33: Are there other aspects of storage requirements that you feel aren't listed here and that will have a significant impact on cost or the service quality? If so, please list and describe them and their effect.

We agree with the response detailed by ISDA.

Q34: Is a recovery time of 4 hours sufficiently fast enough for you to meet your requirements for obtaining OTC Derivative ISINs? If not, please detail the business cases that evidence this.

We agree with the response detailed by ISDA.

Q35: There will be an annual internal system failover test. Should there be a separate failover test with the industry to enable participants to test their failover procedures? If so, please indicate how often this should occur.

We agree with the response detailed by ISDA.

Q36: Are there other disaster recovery aspects that you feel aren't listed here and that will have a significant impact on cost or the service quality? If so, please list and describe them and their effect.

We agree with the response detailed by ISDA.

Q37: Is the additional cost (at most double) appropriate, considering the risks of not providing this level of resiliency?

We agree with the response detailed by ISDA.

Q38: Given the objective to use at least two geographical locations for the system, do you have any specific locations that should not be considered? If so, please explain why and provide evidence where possible.

We agree with the response detailed by ISDA.

Q39: What other key technical milestones does your organization need to know regarding the implementation of the DSB? Please explain your reasoning and also indicate the date by when you would need that information.

We agree with the response detailed by ISDA.

Q40: The DSB production service will run in parallel to the UAT and only certified users will be permissioned to connect to the DSB production. The DSB is planning to utilize the UAT environment to complete certification. Do you agree to this approach? If not, please explain your reasoning and provide evidence where possible.

We agree with the response detailed by ISDA.

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