

2019 questions to industry

The following questions are based on queries and feedback received from industry since the DSB went live in October 2017. The purpose of the consultation is to obtain industry’s view is to ensure that the DSB focuses its attention on those potential changes which are the most valuable. The features identified as most desired by industry (because of this first round of consultation) will be subsequently analyzed in greater detail. Additional detail on costs and functionality will be provided as part of the second consultation to allow industry to feedback on whether it wishes the DSB to proceed with the implementation in 2019.

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
- The 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 specific requests are 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 analyze client needs in more detail and include anonymized statistics as part of the second consultation report
- Responses must be received by 5pm UTC on 13th June 2018
- All consultation related queries should be directed to industry_consultation@anna-dsb.com

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User Type	Power
Select if responses should be anonymous	<input type="checkbox"/>

Section 1: User Categorization and Fees

#	Question for Consultation	Participant's Response
1	<p>Do you agree with the proposed user categorization?</p> <p>If not, what alternative(s) do you propose? Wherever possible please refer to public data made available by the DSB in your response.</p>	<p>The proposed model is overcomplicated and does not split costs fairly amongst the industry. The current model (using LEIs) is better than the proposed (MIC) – although the model suggested by EVIA would be preferable than both. <i>(EVIA propose a flat fee across all MiFID2 market participants (EBA reported over 6 500 investment firms in 2014) which would leave the funding of the DSB as a utility tax provision at c. Eur 1,000 per firm).</i></p> <p>The current and the proposed models unfairly discriminate against MTFs and OTFs who, because of regulatory requirements, must separate their business amongst numerous entities. Separating costs by MIC code further exacerbates this problem – costing even more for the same number of ISINs as produced today. Using the current pricing model, a fee per Group would be fairer - The acceptable use policy would prevent abuse of the system – and if</p>

		appropriate for an entity then multiple Power User licenses could be purchased.
2	Do you concur with the proposed user fee model? If not, what alternative do you propose? Wherever possible please refer to data made available by the DSB both as part of this consultation and publicly .	See question 1
3	The DSB currently offers identical terms to all users in a particular category. Should the license terms for commercial intermediaries be different from other user license terms? If so, please specify alternative terms for commercial intermediaries.	In our view intermediaries should not need to pay.
4	The DSB's user fee model assumes continued use over the year. Do you have workflows that require one-off DSB connectivity? If so, please could you provide examples e.g. one-time data consumption, one-off bulk creation of OTC ISINs, etc.	No
5	What additional user categories and/or charging models do you want the DSB to provide, if any?	Power User should be at a Group level – not by LEI or MIC
Section 2: Functionality		
6	The DSB currently provides for web-interface (GUI) users to download search results in JSON (machine readable) format.	
	a. Do you believe the DSB should extend the types of download formats considering the diverse user base (ref. section 2 of the DSB consultation presentation)?	No, we don't believe DSB should extend the types of download formats.

	<p>b. If yes, do you believe that csv (comma separated values) is a reasonable alternative format for downloaded search results? If not, please provide preferred alternatives. Note that the csv format is specifically suggested due to user requests since launch.</p>	N/A
7	<p>The DSB currently provides two automated integration methods (ReST and FIX APIs) but has also received interest for Excel API integration to allow easier manipulation and access to OTC derivatives reference data.</p>	
	<p>a. Do you think the DSB should provide Excel API integration as a third API option?</p>	No, we don't believe it is necessary
	<p>b. If Excel API integration is to be provided, should the functionality include both ISIN creation and search/retrieval, or is a subset of the functionality sufficient? If a subset, please provide the appropriate scope of the functionality.</p>	N/A
	<p>c. Should the DSB consider any other integration options – programmatic or otherwise - such as an API that enables users to more easily obtain data in a human readable format? If yes, please explain what type of API would best suit your needs.</p>	No, we don't believe it is necessary.
8	<p>The DSB currently updates its product templates (request and response) each time an enumeration list or value changes. For example, a new reference rate, underlying index or currency could need to be added to the list. This may result in a two- to four-week development, testing and deployment cycle on each occasion (depending on the nature of the</p>	We don't believe the approach needs to be altered.

	<p>change), which in turns requires industry to also follow a similar process.</p> <p>Do you believe this approach needs to be altered or is the current process and time to market satisfactory for your purposes?</p>	
9	<p>The DSB currently provides end-of-day OTC-ISIN record files in JSON format on a daily basis and has received some requests to also make available (a) consolidated, on-demand data for any user-defined period and (b) such consolidated snapshots to be provided in comma separated value (csv) format to allow a broader set of users to be able to consume the data in a less technology intensive manner.</p> <p>Do you concur with this view? If yes, please could you provide examples of how this additional functionality would aid your integration with the DSB.</p>	<p>We don't believe this functionality is necessary.</p>
10	<p>The existing DSB GUI ISIN search functionality is targeted at technical users who understand the Lucene programming language (see here: https://www.anna-dsb.com/download/dsb-search-1-3/). This means organisations and end-users with small IT departments may not be able to take advantage of the full search capabilities of the DSB GUI.</p> <p>Bearing in mind the additional development effort that would be required, should the DSB enhance its GUI to allow non-technical users to search for ISINs by any attribute across any product template?</p>	<p>We don't believe changes are necessary.</p>
11	<p>Some user feedback has been received asking the DSB to provide analytics that would allow users to have real-time insight into ISIN creation trends within the DSB.</p>	
	<p>a. Do you concur?</p>	<p>No – this functionality is not required.</p>

	b. If yes, what analytics would you like to see the DSB make available to the market?	N/A
12	What additional user workflows, if any, do you want to see the DSB support?	None required

Section 3: Service Levels

13	Are you satisfied with the DSB's current client service levels?	During the Onboarding service levels were poor, however the service has improved since.
	a. If not, what more do you believe the DSB could do to improve the level of service available to you?	
	b. The DSB has received requests from users to provide named account managers for single point of contact for queries. The DSB currently does not have personnel providing such a function and would need to hire additional staff to fulfil this need. Do you believe the DSB should have account managers? If yes, please explain why and provide your proposal for an appropriate ratio of account managers to users for each category of DSB user.	We don't believe this is required.
	c. The DSB has received requests from users to provide telephone support in addition to the existing email-based support. The DSB currently does not have the personnel to provide such a function and would need to hire additional staff to fulfil this need. Do you want the DSB to enhance its support model to also include a phone-based helpdesk during operating	We don't believe this is required.

	<p>hours? If yes, please explain why this is needed, with reference to the categories of DSB users that you believe telephone support should be made available to. If a phone based model is required, do you believe an external ticketing system should be implemented to track calls made to the DSB?</p>	
	<p>d. What else (if anything) could the DSB do more/ less to better service your institution's needs?</p>	N/A
14	<p>The current DSB performance SLA is to process 99% of all messages across all workflows within 1,000ms. The DSB proposes a more targeted performance SLA based on 3 individual workflows:</p> <ul style="list-style-type: none"> a. ISIN Record retrieval workflow: 99% of all lookups (via an ISIN identifier) to occur within 500ms b. ISIN Create Request workflow: 99% of all ISIN create requests to be processed within 1,000ms (both for ISIN creation and return of existing ISIN where the ISIN already exists) c. ISIN Search workflow: 99% of all searches (via wildcard attributes) to occur within 5,000ms <p>Is the proposed revision to the model and latency metrics appropriate? If not, what do you believe is more appropriate and why?</p>	<p>We don't believe changes to the existing model are required.</p>
15	<p>The DSB has received user requests to stay abreast of upcoming market changes and enable the DSB to provide timely implementation timelines (e.g. SONIA reform, introduction SOFR, currency code updates, reference data requirements for FTRB, etc.). At this time the DSB is not integrated within existing industry fora which has resulted in user</p>	<p>We don't believe this is required.</p>

	<p>feedback to the DSB that some notifications to the DSB of impending industry changes have occurred late, resulting in the late creation of associated ISINs.</p>	
	<p>a. Do you believe the current level of DSB integration with industry is sufficient? If no, please provide examples of how the DSB can be better integrated with industry.</p>	<p>DSB should refer to the governance arrangements proposed in the recent FSB consultation and use this as a guide. Those proposals ensure fair and inclusive representation of users and members – as well as ensuring strict oversight by regulators and interested parties.</p>
	<p>b. Should the DSB explore membership of industry bodies to better integrate with user expectations and workflows? If yes, which bodies (for example AFME, EVIA, FISD, FIX, ICMA, ISDA, SIIA), bearing in mind that membership will require additional resources and potentially expenditure on membership fees?</p>	<p>No- It would be preferable to make sure their governance arrangements are inclusive of a fair representation of their users and members’.</p>
	<p>c. Are there any other actions the DSB should take for better integration with industry?</p>	
16	<p>The DSB introduced a new web-site (www.anna-dsb.com) in 2018 that contains amongst other items, the DSB’s performance SLAs, the DSB User Agreement, the DSB’s availability hours, all technical documentation and all DSB notifications.</p> <p>What additional transparency information would you like to see made available and why?</p>	<p>The following additional transparency information should be made available:</p> <ul style="list-style-type: none"> i. Financial reports ii. Board minutes, Risk, Audit and any other reports commonly made public under reporting standards iii. Minutes of all interactions with ESAs and NCAs
17	<p>The current DSB availability hours is 24*6, from Sunday 12 noon UTC to Saturday 12 noon UTC and reflects the DSB’s mandate to support RTTS-23 reporting. The DSB has heard that in some circumstances this may not be sufficient; e.g., where OTC-ISINs are being created to allow for RTS-2 reporting. Bearing in mind that</p>	

	additional availability hours will require additional resources:	
	a. Are the current availability hours appropriate?	Yes
	b. If not, what are the most appropriate availability hours?	N/A
	c. What should be the downtime period for holidays (if any)?	
18	<p>Programmatic Users are currently able to submit up to 60 messages per minute via ReST and have one message in flight via FIX. Details are:</p> <p>A. FIX connected Users streaming messages to the DSB Service must not have more than 1 message (comprised of create or search or any other message) per connection pending acknowledgement from the DSB Service at any given time;</p> <p>B. Users connecting via REST API (as set out in the Connectivity Policy) are permitted to make up to 60 API calls (comprised of create or search or any other calls) per minute per connection subject to the overall cap set out in the acceptable use policy;</p> <p>Do you believe the DSB should revisit these thresholds? If yes, do you believe the rate should increase or decrease given that programmatic users may have up to 10 simultaneous API connections? Please provide acceptable alternative thresholds if you believe that the current values should be amended.</p>	No revision needed.
19	<p>Programmatic Users are currently subject to the following weekly caps to ensure that the DSB infrastructure continues to offer stability:</p> <p>A. Users connected via an API (FIX or ReST) must not send more than 200</p>	We don't believe a revision is needed.

	<p>invalid messages a day or more than 1,000 in a calendar week across all API connections;</p> <p>B. Users connected via an API undertake not to send the DSB Service more than 100,000 search requests or 50,000 ISIN creation requests in any given calendar week across all API connections.</p> <p>Do you believe the DSB should revisit these thresholds? If yes, do you believe the rate should increase or decrease given that users are able to have up to 10 simultaneous API connections? Please provide acceptable alternative thresholds if you believe that the current values should be amended.</p>	
<p>20</p>	<p>Technical Support Outside Availability Hours:</p> <p>In order to save on staffing costs, the DSB does not currently monitor the system outside the mandated availability hours. Instead, support staff start their rotas one hour before the availability start time. Consequently, a system failure during the unavailability hours that lasts longer than one hour will impact the DSB uptime SLA. The DSB is aware that the risk of system failure is typically higher at start of week because of system restarts that typically occur during this period.</p> <p>Therefore, the DSB has considered two options to address this risk:</p> <ol style="list-style-type: none"> 1. Institute an on-call rota during the 24-hour unavailability period so that serious failures are picked up on a reactive basis and worked on as soon as they occur. 2. Institute an additional set of support rotas for the unavailability hours, to ensure continuous proactive monitoring of the system. This option 	<p>Technical Support Outside Availability Hours are not required.</p>

	will also result in the 24x7 availability of the technical support function.	
	a. Do you agree that the risk outlined above should be addressed by the DSB?	Not required
	b. If yes, do you have a preference on which option provides the optimal outcome bearing in mind that the reactive support option (1) will likely incur less costs to implement than implementing the proactive 24x7 availability of technical support in option (2)?	N/A
	c. Are there any other options that the DSB should explore to mitigate the risk outlined above?	N/A

Section 4: Service Availability

	Current scheduled weekly downtime is 12 noon UTC Saturday to 12 noon UTC Sunday.	
21	a. Is this appropriate?	Yes
	b. What should be the downtime period for holidays (if any)?	
22	<p>Multiple Primary Regions: The existing DSB Disaster Recovery (DR) architecture is based on a single primary Amazon Web Services (AWS) Region in the EU that is in continuous use, and a second passive DR Region in the US that is only used if there is a disaster in the AWS EU Region.</p> <p>This means the DR site is only actively tested for effectiveness once a year as part of an annual DR test. The DSB would like to understand industry appetite for a revised architecture that allows for both AWS regions to be primary, by implementing a system where the primary region flip-flops between the two regions on a regular basis (for example, every week or month).</p>	No- not required.

	<p>Such an approach will ensure that both Regions are fully in sync on a continuous basis, thereby lowering the risk of failover to DR uncovering issues only at the time of failover.</p> <p>Do you believe the DSB should move to such a primary / primary architecture across the two AWS Regions as a means of increasing the robustness of the DSB’s DR plans? What other factors should the DSB consider for its DR plans? (e.g. is the preservation of connectivity configuration if the primary were to flip-flop an important consideration for API users?)</p>	
23	<p>Multi-cloud DR: The DSB’s operations are hosted entirely on the AWS cloud across two separate AWS Regions, utilising 3 separate Availability Zones within each Region. The DSB believes this architecture mitigates all risks apart from a total outage of the cloud operator itself. Mitigating this remaining risk will require the DSB to consider a multi-cloud hosting model to remove the dependency on a single operator (AWS).</p> <p>Do you believe the DSB should mitigate the risk of collapse of an entire cloud operator by moving to a dual-cloud deployment?</p>	No- not required
<p>Section 5: DSB Access and Usage Agreement</p>		
24	<p>The DSB does not currently incur penalties for failing to meet SLAs and has received some comment on this. Do you have a view on how this should work given the DSB’s cost-recovery mandate?</p>	<p>We don’t believe the DSB should incur penalties. There should be a governance model that would deal with such matters.</p>
25	<p>Uncapped fee amount – there has been commentary about the uncertainty in the DSB’s current fee model. Do you have a view on alternative models that could be applied across the spectrum of DSB user types?</p>	<p>We propose that all costs must be pre-agreed by users via appropriate governance arrangements. Users should not be surprised by new costs. Ever.</p>

		We expect the DSB to manage costs on a tender basis to get the lowest possible price for the relevant requirements (e.g. tendering to 3 different vendors for technical components). We would also be grateful for transparency around detailed costs.
26	Agreement can be changed unilaterally – Do you have a view on how the DSB could address the risk that unforeseen events require a contract change, especially given the start-up nature of the utility which increases likelihood of such risks?	We propose that changes can be made on a 90-day notice period and for serious regulatory reasons only.
27	The DSB Access and Usage Agreement requires intermediaries to supply details of any client who should be a paying member of the DSB. Do you have a view on whether this is appropriate? If you disagree with the DSB’s current approach, please propose an alternate mechanism that could be instituted to ensure that users who sign DSB contracts are not disadvantaged by users who abuse the system by going through an intermediary but not paying.	Yes, there needs to be transparency and accountability of users, particularly if this is to properly be a cost shared service.
Section 6: AOB		
28	What other operational enhancements would you like to see the DSB make?	None
29	What additional services would you like to see the DSB provide? Please provide examples or business cases where relevant.	None
30	What are the top three changes you would like to see the DSB make to better serve your institution’s needs (including any that may have been listed above)? Listed in order of preference.	<ul style="list-style-type: none"> i. Change in fee structure as described in question 1. ii. Change in governance to an open and transparent model

		iii. Daily data reconciliation with the FIRDS database
31	Please insert any other comments you wish to provide	