

1.1 Appendix 3 - Second 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 29th July 2019
- A webinar to address consultation related queries will take place on Thursday 11th July 2019. 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 | United Kingdom |
| Company Type | Multilateral Trading Facility (MTF) |
| User Type | Power |
| Select if response should be anonymous | X |

| CP2 Q# | QUESTION FOR CONSULTATION | PARTICIPANT'S RESPONSE |
|----------------------|---|--|
| FUNCTIONALITY | | |
| 1 | <p><u>CFI Codes for EMIR</u></p> <p>Given the approach set out above, the cost estimates provided by the DSB in this consultation, and bearing in mind that these costs would be shared across the DSB's user base as per the DSB's existing fee model, do you believe it is appropriate for the DSB to provide a CFI service to act as the golden source of CFI codes for all EMIR Level III products, or should such a service be left to commercial operators?</p> | <p>We remain convinced the golden source of CFI code should be left to commercial operators or regulators.</p> <p>Considering the cost estimation, if this service is provided by ANNA DSB, current DSB users should not bear the cost of an additional service which might never be used.</p> <p>If DSB wants to start a CFI golden source service, the cost and legal terms should be separate from the core business provided by the DSB i.e. OTC ISIN creation/maintenance</p> |
| 2 | <p><u>Mapping to MiFID II Taxonomy</u></p> <p>2(a): Do you concur with the DSB's proposal to perform the analysis for MiFID II Taxonomy mapping?</p> | <p>Yes. As per our response in the first consultation paper, we would urge the DSB to consider the possibility to distribute the cost to currently non-paying customers who would use such analysis.</p> |
| | <p>2(b): If you answered "yes" to the question above, do you want the DSB analysis to address all products under MiFID II RTS-2 scope or just OTC derivatives in scope of the DSB?</p> | <p>The DSB analysis should only address DSB instruments at first. DSB should re-assess expanding the universe once the DSB instruments are analysed.</p> |
| 3 | <p><u>Default values in ISIN Templates</u></p> <p>Do you concur with the DSB's proposal to utilise the DSB Challenge Process and existing PC secretariat resourcing to manage default value population within the product templates?</p> | <p>Yes, we agree to utilise the DSB Challenge Process and existing PC secretariat resourcing to manage default value population within the product, with appropriate and timely external communication.</p> |
| 4 | <p><u>Underlying Identifiers</u></p> <p>Do you concur with the DSB's proposal to utilise existing PC secretariat resources to manage requests for additional underlying data such as US equities?</p> | <p>Yes, we agree to utilise existing PC secretariat resources to manage requests for additional underlying data such as US equities.</p> |
| 5 | <p><u>GUI Enhancements</u></p> <p>Do you concur with the DSB's proposal to implement a minimal set of search filters targeting occasional users?</p> | <p>No, we do not support implementing a minimal set of search filters. This would incur cost for users who took the time to train their</p> |

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| | | internal staff to use DSB. Occasional users can do the save and save everyone some money |
| 6 | <p><u>Other Technical Enhancements</u></p> <p>Do you concur with the DSB's proposal to utilise existing TAC resources to address the identified concerns as part of the DSB's business as usual resourcing?</p> | Yes, existing TAC resources should be used to address identified concerns as part of the DSB's business as usual resourcing. |
| DATA SUBMISSION ENHANCEMENTS | | |
| 7 | <p><u>Tool for Proprietary Index Submissions</u></p> <p>Do you concur with the DSB's proposal to take no further action on a tool to enhance the proprietary index submission process?</p> | We agree on no further action to enhance the proprietary index submission process. |
| 8 | <p><u>SLA for Proprietary Index Submissions</u></p> <p>Do you concur with the DSB's proposal to keep unchanged the SLA for proprietary index submissions?</p> | We choose not to opine. |
| 9 | <p><u>Automated User Submission Process for Proprietary Indices</u></p> <p>Do you concur with the DSB's proposal to investigate the provision of an automated user submissions process as part of the DSB's business as usual resourcing and prioritisation?</p> | We choose not to opine. |
| 10 | <p><u>Machine-Readable Format for Proprietary Indices</u></p> <p>Do you concur with the DSB's proposal to investigate the automated provision of the full of list proprietary indices in a machine-readable format as part of the DSB's business as usual resourcing and prioritisation?</p> | We choose not to opine. |
| 11 | <p><u>LEI for CDS Single Name</u></p> | We support the build of the LEI-ISIN mapping services for CDS single names. |

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| | Do you concur with the DSB's proposal for the build of the LEI-ISIN mapping service for CDS single names? | |
| 12 | <u>Validation of CDS Single Name</u> Do you concur with the DSB's proposal to examine the number of CDS SN ISINs that have been incorrectly created and work with the PC to determine next steps, if any? | We agree in examining the CDS SN ISINs that have been incorrectly created and working with the PC to determine next steps. |
| 13 | <u>Supplemental Data for ISIN-LEI Mapping</u> Do you concur with the DSB's proposal to perform initial analysis to further explore the supplemental data examples cited by users as part of the DSB's business as usual resourcing and prioritisation? | We support initial analysis to further explore supplemental data examples cited by users as part of DSB's business as usual resourcing and prioritisation. |
| 14 | <u>Mapping of Index Names to Underlying Identifiers</u> Do you concur with the DSB's proposal to perform the business and technical analysis on the mapping of index names to underlying identifiers? | We support the business and technical analysis on the mapping of index names to underlying identifiers. |
| 15 | <u>Data Review Process</u> Do you concur with the DSB's proposal to work with the PC to review each of the requests for additional underlying data made above on a case by case basis as part of its business as usual operations? | We support the DSB's proposal to work with the PC to review each of the requests for additional underlying data made above on a case by case basis as part of its business as usual operations. |
| SERVICE LEVELS | | |
| 16 | <u>Bulk ISIN Creation</u> Do you concur with the DSB's proposal to drop further analysis on bulk ISIN creation? | We do not support further analysis on bulk ISIN creation in the context of the first consultation question, i.e. question related to DSB GUI only. We believe the DSB FIX API can be improved in this regard. |

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| 17 | <p><u>Searchable On-Line Utility</u></p> <p>Do you concur with the DSB's proposal to work with the TAC and PC to agree an appropriate design and functionality as part of its business as usual operations?</p> | We support working with the TAC and PC to agree on appropriate design and functionality as part of its business as usual operations. |
| 18 | <p><u>Phone-Based Support</u></p> <p>Do you concur with the DSB's proposal to drop further investigation on phone support?</p> | We support dropping further investigation on phone support. |
| 19 | <p><u>Proactive AUP Monitoring</u></p> <p>19(a): Do you concur with the DSB's proposal to implement the core functionality?</p> | We support the email/core functionality. |
| | <p>19(b): Do you concur with the implementation of the API functionality?</p> | We do not support the API functionality of such monitoring. |
| SERVICE AVAILABILITY | | |
| 20 | <p><u>Downtime Window</u></p> <p>Do you concur with the DSB's proposal to change the DSB's downtime hours to between 00:30AM Sunday UTC and 12:30PM Sunday UTC?</p> | We support DSB's proposed downtime hours to be between 00:30AM Sunday UTC and 12:30PM Sunday UTC. |
| CYBERSECURITY | | |
| 21 | <p><u>GUI Multi-Factor Authentication</u></p> <p>Do you concur with the DSB's proposal to implement a minimal MFA solution for the GUI?</p> | We do not support implementing a minimal MFA solution for the GUI. |
| 22 | <p><u>Secure SDLC</u></p> <p>Do you concur with the DSB's proposal to move forward with analysis of Secure SDLC?</p> | We do not support moving forward with analysis of Secure SDLC considering the cost estimated by DSB. |

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| 23 | <p><u>ISO 27001/2 for Cyber Breach Risk</u></p> <p>Do you concur with the DSB's proposal to move forward with the analysis phase for the implementation of the ISO27001/27002 framework?</p> | We do not support moving forward with the analysis phase for the implementation of the ISO27001/27002 framework considering the cost estimated by DSB. | |
| 24 | <p><u>ISO 27018 for PII Breach Risk</u></p> <p>Do you concur with the DSB's proposal to take no further action?</p> | We concur for DSB to take no further action. | |
| 25 | <p><u>On-Boarding of CISO</u></p> <p>Do you concur with the DSB's proposal to on-board a part-time CISO with a full-time security engineer?</p> | We do not support on-boarding a part-time CISO considering the cost estimated by DSB. | |
| FEES AND USER AGREEMENT | | | |
| 26 | <p>The current timeline for determination of annual fees is the first working day of December (DSB Charges Policy – paragraph 2.4¹). Communication of the fees is published two days following the fee determination i.e. within the first week of December.</p> <p>When do you need the annual fees for the following year to be communicated?</p> | July | X |
| | | August | |
| | | September | |
| | | October | |
| | | November | |
| | | December (unchanged) | |
| | | No opinion | |
| 27 | <p>The current cost recovery model results in DSB fees being set in way that incorporates adjustments related to the following year's service provision, based on industry consultation feedback and input from both industry committees.</p> <p>By bringing the fee determination period forward, the DSB may need to allow for some level of build & run related uplift. This is</p> | 0-4% | X |
| | | 4-8%, | |
| | | 8-12%, | |
| | | No opinion | |

¹ https://www.anna-dsb.com/download/dsb-charges-policy_v3-1_2019_final/

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|------------|---|---|-----|--|----------|---|------------|--|----------|--|----------|--|------------|--|-------|--|
| | <p>because the outcome of industry consultation may not be known at the time of fee determination if the timeline is brought forward.</p> <p>What level of cost adjustment should be accommodated?</p> | | | | | | | | | | | | | | | |
| 28 | <p>Industry consensus in 2018 resulted in the DSB making no changes to the way in which user fees were determined for 2019.</p> <p>Do you believe this should remain the case?</p> | <table border="1"> <tr> <td data-bbox="903 645 1177 696">Yes</td> <td data-bbox="1177 645 1453 696"></td> </tr> <tr> <td data-bbox="903 696 1177 748">No</td> <td data-bbox="1177 696 1453 748">X</td> </tr> <tr> <td data-bbox="903 748 1177 799">No opinion</td> <td data-bbox="1177 748 1453 799"></td> </tr> </table> | Yes | | No | X | No opinion | | | | | | | | | |
| Yes | | | | | | | | | | | | | | | | |
| No | X | | | | | | | | | | | | | | | |
| No opinion | | | | | | | | | | | | | | | | |
| 29 | <p>The current fee model is designed to ensure that all users of the service, irrespective of size or whether a multi-faceted organisation, can reasonably access the services under fair and equitable terms. Based on this model, the applicable annual fee is applied to each user who executes the DSB Access and Usage Agreement regardless if they have an existing agreement/s in place. Please note, any amendment to the fee model including discounted fees for those users with multiple agreements means the revenue reduction will need to be recovered by the user base to ensure cost recovery of the service.</p> <p>Do you believe a fee discount should be made available for entities requesting multiple or group wide agreements?</p> <p>If yes, above, what level of discount should be applicable?</p> | <table border="1"> <tr> <td data-bbox="903 947 1177 999">No</td> <td data-bbox="1177 947 1453 999"></td> </tr> <tr> <td data-bbox="903 999 1177 1050">Yes, 15%</td> <td data-bbox="1177 999 1453 1050">X</td> </tr> <tr> <td data-bbox="903 1050 1177 1102">Yes, 20%</td> <td data-bbox="1177 1050 1453 1102"></td> </tr> <tr> <td data-bbox="903 1102 1177 1153">Yes, 25%</td> <td data-bbox="1177 1102 1453 1153"></td> </tr> <tr> <td data-bbox="903 1153 1177 1205">Yes, 50%</td> <td data-bbox="1177 1153 1453 1205"></td> </tr> <tr> <td data-bbox="903 1205 1177 1256">No opinion</td> <td data-bbox="1177 1205 1453 1256"></td> </tr> <tr> <td data-bbox="903 1256 1177 1308">Other</td> <td data-bbox="1177 1256 1453 1308"></td> </tr> </table> | No | | Yes, 15% | X | Yes, 20% | | Yes, 25% | | Yes, 50% | | No opinion | | Other | |
| No | | | | | | | | | | | | | | | | |
| Yes, 15% | X | | | | | | | | | | | | | | | |
| Yes, 20% | | | | | | | | | | | | | | | | |
| Yes, 25% | | | | | | | | | | | | | | | | |
| Yes, 50% | | | | | | | | | | | | | | | | |
| No opinion | | | | | | | | | | | | | | | | |
| Other | | | | | | | | | | | | | | | | |
| 30 | <p>Please provide any additional user fee related feedback you wish to provide.</p> | <p>We would urge the DSB to focus on core functionalities. We are surprised that almost two years post go-live, costs continue to increase.</p> | | | | | | | | | | | | | | |

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| 31 | Do you concur with the DSB's proposal to form the DSB Agreement Forum and present its findings within the annual DSB consultation in 2020? If not, what is your specific alternate proposal (if any)? | N/A |
| AOB | | |
| 32 | Please use this space for any other comments you wish to provide | N/A |