

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	Rudolf Siebel
Email Address	Rudolf.siebel@bvi.de
Company	BVI (German Investment Funds Association)
Country	Germany
Company Type	Trade Association
User Type	Infrequent
Select if response should be anonymous	<input checked="" type="checkbox"/> our response can be made public

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>	Yes.
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>	Yes.
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>	Yes
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>	Yes, more indices and reference rate at same existing resources / cost base are welcome
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>	Yes, easy to search improvements in line with TAC recommendation are welcome.

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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
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>	N.A.
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>	N.A.
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>	N.A.
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>	N.A.
11	<p><u>LEI for CDS Single Name</u></p> <p>Do you concur with the DSB's proposal for the build of the LEI-ISIN mapping service for CDS single names?</p>	Yes, we fully support a LEI-ISIN mapping service based on the ANNA-GLEIF agreement.

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12	<p><u>Validation of CDS Single Name</u></p> <p>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?</p>	Yes, based on existing resource allocation overseen by the Product Committee
13	<p><u>Supplemental Data for ISIN-LEI Mapping</u></p> <p>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?</p>	Yes, analysis is welcome to improve the utility in the future.
14	<p><u>Mapping of Index Names to Underlying Identifiers</u></p> <p>Do you concur with the DSB's proposal to perform the business and technical analysis on the mapping of index names to underlying identifiers?</p>	Yes, analysis of mapping of index ISIN and index name is welcome.
15	<p><u>Data Review Process</u></p> <p>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?</p>	Yes, operational improvements are welcome.
SERVICE LEVELS		
16	<p><u>Bulk ISIN Creation</u></p> <p>Do you concur with the DSB's proposal to drop further analysis on bulk ISIN creation?</p>	
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>	Yes, enhancements as part of standard procedures are welcome.

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18	<u>Phone-Based Support</u> Do you concur with the DSB's proposal to drop further investigation on phone support?	N.A.
19	<u>Proactive AUP Monitoring</u> 19(a): Do you concur with the DSB's proposal to implement the core functionality?	N.A.
	19(b): Do you concur with the implementation of the API functionality?	N.A.
SERVICE AVAILABILITY		
20	<u>Downtime Window</u> 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?	N.A.
CYBERSECURITY		
21	<u>GUI Multi-Factor Authentication</u> Do you concur with the DSB's proposal to implement a minimal MFA solution for the GUI?	Yes, we welcome highest standards of security
22	<u>Secure SDLC</u> Do you concur with the DSB's proposal to move forward with analysis of Secure SDLC?	Yes, we welcome highest standards of security
23	<u>ISO 27001/2 for Cyber Breach Risk</u> Do you concur with the DSB's proposal to move forward with the analysis phase for the implementation of the ISO27001/27002 framework?	Yes, we welcome highest standards of security
24	<u>ISO 27018 for PII Breach Risk</u> Do you concur with the DSB's proposal to take no further action?	N.A.

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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>	Yes, we welcome highest standards of security.															
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>	<table border="1"> <tr><td>July</td><td></td></tr> <tr><td>August</td><td></td></tr> <tr><td>September</td><td></td></tr> <tr><td>October</td><td></td></tr> <tr><td>November</td><td></td></tr> <tr><td>December (unchanged)</td><td></td></tr> <tr><td>No opinion</td><td>N.A.</td></tr> </table>	July		August		September		October		November		December (unchanged)		No opinion	N.A.	
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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 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>	<table border="1"> <tr><td>0-4%</td><td></td></tr> <tr><td>4-8%,</td><td></td></tr> <tr><td>8-12%,</td><td></td></tr> <tr><td>No opinion</td><td>N.A.</td></tr> </table>	0-4%		4-8%,		8-12%,		No opinion	N.A.							
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¹ https://www.anna-dsb.com/download/dsb-charges-policy_v3-1_2019_final/

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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>	Yes	X
		No	
		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>	No	X
		Yes, 15%	
		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>Smaller users should not incur higher fees to support large global institutions.</p>	
31	<p>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)?</p>	<p>All DSB user types independent of size should be represented on the DSB Agreement Forum.</p>	

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AOB		
32	Please use this space for any other comments you wish to provide	We continue to support the DSB becoming the central database / golden source for all derivative identification (ISIN), classification (CFI, UPI) and descriptive elements. We welcome the expansion from TOTV-OTC to other derivative instruments.