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<b>User Type</b>	Not Registered
Select if responses should be anonymous	<input type="checkbox"/>

### Section 1: User Categorization and Fees

1	<p>What specific and objectively verifiable models (if any) are you able to propose that reasonably address the needs of multi-segment and/or multi-market trading venues, whilst not placing an adverse cost on new or smaller market participants (refer to 2.2.1 a)?</p> <p>It is important to note that the proposed MIC level fee model is designed to set fees at a level that can be objectively validated against a publicly available dataset (FIRDS – which contains segment level MICs), whilst ensuring that new and/or smaller institutions are not required to fulfil the same fee requirements as trading venues who, because of regulatory requirements, must separate their business amongst numerous entities.</p> <p>The proposed model aims to ensure that a small credit institution or retail bank is not required to pay the same fees as a large derivatives market maker or similarly, that a small, single market trading venue is not required to pay the same fees as a multi-market trading venue. It is likely that a LEI level model (as proposed by some respondents) will place smaller users of the DSB at a significant cost disadvantage.</p>	<p>EVIA proposed in reply to the first consultation that the DSB fee model be changed into a uniform flat fee for all firms (Legal Entities with a distinct LEI) holding a MiFID licence. To briefly reiterate, this is because the ISIN is a utility identifier which, under its core principle is open for all. The creation of the ISIN confers no benefits onto the creator, only requiring the trading venue to commit to the process workflow and current DSB fees for carrying out the creation. In the absence of any workable passthrough model, such as that witnessed in UK Stamp Tax, the readily identifiable community (“therefore specific and objectively verifiable against the available databases”) should pay a small and pari-passu subscription which we quantified in the first consultation response as approximately Eur 1,000 per MiFID licenced entity.</p> <p>The context and presumption behind question one as posed takes a different approach, namely that ISIN creation has a value to the creator and confers a higher fee the more that activity is undertaken. We remain puzzled why</p>
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		<p>this would be the case. The DSB considers this to be a “fairness question” yet never sets out to define “fairness,” nor to quantify its hitherto approach. Would any of: declared trading volumes, reported revenue or net profits decide the contribution of a MiFID TV/SI/IF towards the value of creating ISINs? Especially since ISINs do not correspond to traded products nor instruments. In the absence of any linkage between trading activities and ISIN creation, then a flat basic user fee approach, akin to a visa permit or a BBC television licence, is the only approach which, despite being simple, could describe “fairness.” Further functionality could be available as required around the specific and bespoke services offered in connection with the consumption of ISINs.</p>
2	<p>What specific and objectively verifiable models (if any) are you able to propose that reasonably address the needs of complex, multi-faceted organizations) whilst ensuring that new and smaller market participants can continue to access the services they currently utilize without being economically disadvantaged at a higher price point. (refer to 2.2.1 b) above)?</p> <p>The proposed model aims to ensure that a small credit institution or retail bank is not required to pay the same fees as a large derivatives market maker or similarly, that a small, single market trading venue is not required to pay the same fees as a multi-market trading venue.</p>	<p>Per our answer to question 1. If costs were borne equally by all those who use the basic utility, all fees at de-minimis price would negate the need to seek any external value judgements sought in question 2.</p> <p>Currently, available and adequate technology is reserved away from standard users to endow power users with a notion of privilege. This is remote from the costs of provision and the effectiveness of the service. A uniform approach would facilitate adequate access being provided across the market participants, rather than penalising non-power users with the current inadequate and non-workable interfaces.</p> <p>A E1,000 fee per MiFID licence, preferably collected via currently established NCA supervisory or fee frameworks would additionally provide a for a more straightforward adaptation into the proposed UTI introduction where more than a single provider of trade identifiers is proposed in the current GUUG open consultation.</p>

		<p>In being so small and so uniform, the tariff is immediately apolitical, whilst encouraging much wider stakeholder participation.</p>
<p><b>Section 2: Functionality</b></p>		
<p>3.i</p>	<p>Industry collaboration: Several respondents requested that the DSB engage users in longer range planning sessions to collaboratively design and deploy additional functionality alongside any service changes and/or enhancements, thus resulting in improved user communication and enabling the DSB to become more integrated with industry needs</p> <p>Feedback was also received requesting the following from the DSB:</p> <ul style="list-style-type: none"> <li>○ the provision of regular touch-points with industry</li> <li>○ the need for DSB driven industry working groups to be set up to facilitate work on certain enhancements</li> <li>○ the creation of a forum for the escalation of issues and/or the prioritization of change requests</li> <li>○ improved access to market knowledge, including specialists with detailed, market segment specific knowledge of the relevant protocols</li> </ul>	<p>No, EVIA does not support the creation of any further user forum. These proposals in question 3, whilst touching on every individual request by responders to the prior consultation, are disproportionate.</p> <p>The recent creation of the DSB Technology Advisory Committee, coupled to its open architecture, gives the industry sufficient additional forum to the Product Committee to voice functional topics. We understand that there remains sufficient bandwidth open and available in these existing trading venues, given the level of funding, would encourage the DSB to create an audit committee to approve financial planning and statements in a similarly open and accessible format to the new TAC.</p> <p>More effective use of the current structures could enable:</p> <ul style="list-style-type: none"> <li>● effective “Gooeys” for all ISIN creators</li> </ul>

- introduction of additional templates across the full spectrum of OTC derivative products, especially for more granular indices and complex derivatives
- introduction of ISIN hierarchies that fall outside of the regulatory scope
- automation of existing services such as the proprietary index submission and use process
- improved alignment with ISDA and the GFMA
- development of a three-year strategic plan

The proposed structure and composition of the user forum is provided below for industry review and feedback. Based on responses to the first consultation, it is anticipated that:

- the user forum would be driven by institutions seeking additional functionality and service levels from the DSB
- the user forum would comprise a cross-functional skill set, with a lead representative per organization serving as a conduit into the relevant organization's needs and priorities
- the user forum would facilitate industry integration as DSB products and services evolve for those user segments seeking enhancements
- the user forum would convene monthly (consistent with anecdotal requests received by the DSB), requiring on average a fortnight's work effort to ensure preparatory and follow-up activities so that expectations were fulfilled in a manner consistent with that required from key market infrastructure providers
- the user forum could be resourced based using one of the following approaches, based on industry feedback with respect to desired outcomes:
  - administrative support to collate/ disseminate feedback and set up logistics. The expected cost is €135k p.a. which includes a blended resource set, office, infrastructure and related administrative and financing costs

- improved participation (and perhaps additional attendees) in existing committees
- public consultations on new fees and/or services – including decisions to place these outside of the cost recovery model
- an open tendering process for additional services
- publication of accounts and annual business plan

This would be a low/no cost solution.

**Second ANNA\_DSB Consultation Now Available;** opens on 28th June 2018 and will close on 27th July 2018, with a final consultation report to be published on 20th August 2018.

	<ul style="list-style-type: none"> <li>▪ a mix of administrative and some OTC derivative market experience to facilitate logistics and assist with product/service design. The expected cost is €190k p.a. which includes a blended resource set, office, infrastructure and related administrative and financing costs</li> <li>▪ a combination of resources with deep OTC derivative delivery and product development skills to expedite discussions and delivery, with proactive industry engagement. The expected cost is €230k p.a. which includes a blended resource set, office, infrastructure and related administrative and financing costs</li> </ul>	
3.ii	If yes, do you agree with the goals of the suggested forum? Please provide your rationale.	No, EVIA does not concur.
3.iii	If yes, do you agree with the proposed composition, structure and format? Please provide your rationale.	No, EVIA does not concur.
3.iv	If yes, which of the three skill sets (proposed above) do you believe is required to support the user forum's goals? Please provide your rationale.	No, EVIA does not concur.
3.v	If yes, please supply any other views you may have about any specific model you wish to see implemented.	No, EVIA does not concur.
3.vi	If not, what model do you propose instead (if any)?	See Question/Answer 2.

4.i	<p>Responsive enumeration management: The DSB can enable support for faster changes to product definition templates by enabling changes to enumeration lists during availability hours and without the need for industry to engage in a full cycle of redevelopment and testing efforts.</p> <p>The cumulative benefit for the DSB's programmatic users is non-trivial with five recent market changes requiring updates to approximately 1,200 templates in a three-month period. With each programmatic user spending on average two days developing and regression testing each enumeration change and a total of 78 Power Users having to make changes, this translates to approximately 156 days of "lost" time per change, i.e. 780 "lost" days per quarter across all DSB programmatic users. Given that the current pace of industry change looks set to continue considering both benchmark related evolutions and ad-hoc currency re-denominations (based on feedback received from users and regulators), proceeding with the proposed change would result in industry saving approximately 3,120 days of work effort each year.</p> <p>The DSB anticipates that the DSB Product Committee (PC) and TAC respectively will be involved in the design of the required product template and technology implementations, to ensure an optimal implementation approach that meets industry needs.</p> <p>The proposed solution requires the DSB to implement product template changes whilst the system is live and operational and without incurring any downtime. This requires significant architectural changes to the ISIN engine as well as changes to deployment and monitoring systems and processes.</p> <p>The DSB estimates this will require re-working of the template structure across appx 180 templates to allow for dynamic enumerations. Let's discuss what you're expecting to see in terms of additional</p>	<p>No, EVIA does not concur. Time and cost saving are irrelevant as trading venues just don't want nor require this functionality. This should be charged outside of the cost recovery model.</p> <p>EVIA responded to the first consultation at some length to the effect that further functionality build-out was not required by the trading venue community. We queried why the DSB was proposing to charge those paying but not requiring for a supposed requirement for those not contributing.</p> <p>A uniform and de-minimis fee approach, combined with the user choice of UPIs may create a more conducive environment for the investments described.</p>
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	<p>detail. The cost is driven by design, documentation, development, QA and deployment effort</p> <p>The DSB estimates build costs within the communal cost recovery ring-fence of €500K - €750K depending on the implementation approach adopted but does not anticipate any change to on-going run costs. The financial impact is an increase in annualised fees of €125K - €187.5K for 4 years, whilst the build cost is amortized over a 4-year period, as per the existing accounting provision for the amortization of build costs.</p> <p>Do you concur with the implementation of this functionality in 2019, given the significant amount of effort (and cumulative cost) saved by the industry?</p>	
4.ii	<p>If the DSB implements this functionality, do you agree that the PC and TAC should be involved in the design of the product and technology solutions respectively? If not, please propose your alternative industry engagement model.</p>	<p>No, EVIA disagrees, per answer to Q. 4. i.</p>
5.i	<p>The DSB received feedback to provide ISIN analytics in machine-downloadable format. Based on this feedback, the DSB proposes to provide the following analytics on a monthly basis:</p> <ul style="list-style-type: none"> <li>○ # of ISIN creates per product template</li> <li>○ # of ISIN retrievals per product template (where ISIN is supplied)</li> <li>○ # of ISIN searches across all product templates (search by metadata)</li> <li>○ # of ISIN creates per user fee category</li> <li>○ # of ISIN retrievals per user fee category (where ISIN is supplied)</li> <li>○ # of ISIN searches per user fee category (search by metadata)</li> <li>○ # of ISINs submitted to FIRDS per product template</li> </ul> <p>DSB expectation is that such analytics can be provided at no incremental build or run cost, as long as the information is placed on the DSB web-</p>	<p>EVIA trading venues do not require this information.</p> <p>Concisely, trading venues do not find that the product templates correspond to traded products (nor indeed to RTS 2 categories); and we are advocating to disassemble the current, “user fee categories”.</p>

	<p>site once a month, for user download in a csv file format.</p> <p>Is the proposed list of analytics appropriate? Please provide an explanation of your reasoning for any changes you would like to see.</p>	
5.ii	<p>Is the proposed monthly frequency of update appropriate? If not, please provide your reasoning, bearing in mind that more frequent updates may result in an incremental uplift in resource requirements</p>	<p>EVIA trading venues do not require this information.</p>
5.iii	<p>Is the proposed delivery model of csv file download from the DSB website appropriate? If not, please provide an alternative alongside your reasoning.</p>	<p>EVIA trading venues do not require this information.</p>
<p><b>Section 3: Service Levels</b></p>		
6	<p>Several requests were made to enable broader industry representation in the PC to enable improved integration with industry. As a reminder, the PC is currently comprised of an equal number of representatives from the buy-side, sell-side and trading venues</p>	<p>Not required by EVIA trading venues, but should this be provided at no additional cost, we have no objections.</p>
7	<p>A recommendation was also made that the DSB not become a member of trade associations but instead reach out to the various bodies asking if the DSB can monitor the output of deliberations of various derivatives working groups on an ongoing basis</p> <p>Which specific industry working groups should the DSB reach out to in order to ensure it is able to monitor the output of various discussion fora and thus feed into the product roadmap and Product Committee deliberations on a proactive basis?</p>	<p>EVIA answered this question fully in the first consultation, per below:</p> <p>No. EVIA does not believe that the DSB should spend additional fees in the membership of industry bodies. Such activities are not specified in the user agreement. To expend time and user paid resources in limited outreach is misguided and could only incur both costs and indeed bias.</p> <p>Any expertise that may be required could be undertaken by employing the expert product committee which has now been in place for sufficient time to be efficient in providing this knowledge base, or via a discreet call for</p>

		<p>evidence across the joint trade associations from an external standpoint.</p>
<p>8.i</p>	<p>General consensus was that holiday downtime should be eliminated and that the DSB should look to move to a 24/6.5 or 7/7 model to facilitate a global trading environment.</p> <p>The DSB anticipates that supporting the additional coverage and services would require the following marginal resource increase. Note that the figures below are provided on both an isolated service and combined package basis, with isolated costs over-estimating the actual resource requirements given the synergies across the individual items.</p> <p><u>Isolated service costs</u> – if any given service was to be implanted on a stand-alone basis:</p> <ul style="list-style-type: none"> <li>○ Remain operational across all holidays (0.2 FTE technical support uplift)</li> <li>○ Increase availability hours from 24x6 to 24x6.5 by reducing weekly downtime to between Saturday 20:00 UTC and Sunday 08:00 UTC (0.6 FTE technical support uplift)</li> <li>○ Improve email response times for Power Users (2 FTE technical 24 x 6.5 coverage: 2 x additional technical support)</li> <li>○ Instigate on-call rota for technical support during unavailability hours for addressing system failures (0.5 FTE technical support uplift)</li> <li>○ Move to a monthly release schedule for all Business-as-Usual functionality changes, with the aim of moving to quarterly release</li> </ul>	<p>No, EVIA does not concur. Trading venues do not need this functionality. This should be charged outside of the cost recovery model.</p> <p>Per the first consultation, EVIA believe that the current hours are appropriate, and that Target 2 holidays as set out by the ECB should be downtime period for the DSB.</p>

	<p>cycles by the end of the 2019 (no impact on resourcing)</p> <p><u>Packaged service costs</u> - implementing the service level improvements in I through V above as a synergistic package will result in the following resource uplifts:</p> <ul style="list-style-type: none"> <li>○ Technical Support uplift from 6.5 FTE to 10 FTE</li> <li>○ Secretariat / Product Management uplift from 2 FTE to 3 FTE</li> <li>○ Implementing this service is expected to cost €700k p.a. which includes resource, office, infrastructure and related administrative costs.</li> </ul> <p>Do you concur that the DSB should be implementing the proposed service level improvements as outlined above? Please explain your reasoning.</p>	
8.ii	<p>If not, which of the individual service level improvements outlined above would you wish to see implemented, if any? Please explain your reasoning.</p>	<p>EVIA does not concur.</p>
8.iii	<p>Telephone access to technical support during availability hours requires an additional 4.5 x FTE technical Support uplift. Implementing this service is expected to cost €610k p.a. which includes resource, office, infrastructure and related administrative and financing costs.</p> <p>Do you believe telephone access to technical support is required within the cost-recovery ring-fence? If yes, what availability hours do you require?</p>	<p>EVIA does not concur. This should be charged outside of the cost recovery model.</p>

8.iv	<p>Telephone access to product support during London hours requires an additional 1x FTE secretariat / product management uplift. The expectation is that this resource would be able to respond to the more complex questions typically requested by Power Users. Implementing this service is expected to cost €360k p.a. which includes resource, office, infrastructure and related administrative and financing costs.</p>	<p>EVIA does not concur. This should be charged outside of the cost recovery model.</p>
8.v	<p>Do you believe telephone access to technical support is required within the cost-recovery ring-fence? If yes, what availability hours do you require?</p>	<p>EVIA does not concur. This should be charged outside of the cost recovery model.</p>
9	<p>Performance SLA – The DSB proposes to implement the following changes to its performance metrics</p> <ul style="list-style-type: none"> <li>○ 500ms latency for 99% of workflows related to ISIN Record retrieval</li> <li>○ 1,000ms latency for 99% of workflows related to ISIN Create Requests</li> <li>○ 5,000ms latency for 99% of workflows related to ISIN Search (by metadata)</li> <li>○ Implementation of this change has no impact on DSB build or run costs.</li> </ul> <p>Are there any other latency metrics that should be part of the DSB performance SLA?</p>	<p>EVIA trading venues do not require these millisecond performance metrics. EVIA understands that implementation of this change has no impact on DSB build or run costs but emphasises that completeness and accuracy is far more important than latency.</p> <p>Any query response time under a single second is welcome, but to delve into sub-second performance is irrelevant to the user agreement or the needs of those who use the DSB and have a longer horizon within that trading day.</p>
10.i	<p>Acceptable Use Throughput – The DSB has two possible approaches to modify the throughput caps:</p> <ul style="list-style-type: none"> <li>○ Modify the throughput caps to allow occasional bursts above the permitted caps of 60 REST APIs per connection and one simultaneous FIX message in flight. Such a change requires a one-off €120K build cost to the monitoring and reporting systems to allow automated tracking of such burst behaviour. There is also the need for some additional system resources, dependent on the amount and duration of the burst period. As an example, the DSB estimates that allowing bursts of one hour in any 24-hour period at</li> </ul>	<p>EVIA does not concur with proposed changes to “Acceptable Use Through-put”. Trading venues do not require these modifications nor welcome any “Burst Mode” being developed. Any such changes should be charged outside of the cost recovery model.</p>

	<p>double the throughput caps will likely increase the DSB run costs by €75K. In this scenario, the overall result will be an increase in DSB costs of €75K on a recurring basis, plus an additional €30K per annum amortization of the build cost, time-limited to 4 years.</p> <ul style="list-style-type: none"> <li>○ Double the throughput caps to allow constant higher levels of throughput without regard to the concept of any 'burst mode'. Such an approach requires increased system resources, increasing the run-costs of the DSB by an estimated €420K per annum. There is no build cost for this option.</li> </ul> <p>Should the DSB implement the 'burst mode' approach highlighted above? If yes, is a burst duration of one hour every 24 hours an appropriate initial implementation?</p>	
10.ii	<p>Should the DSB implement an increase in the throughput caps? If so, is a doubling of the existing cap level an appropriate initial implementation?</p>	<p>EVIA does not concur.</p>
<p><b>Section 4: Service Resiliency</b></p>		

11	<p>Some respondents concurred with the need for the DSB to institute multiple primary based disaster recovery architecture. The DSB expects such an approach will reduce industry downtime during a disaster from 4 hours to between 1-2 hours.</p> <p>The implementation of such a solution requires a significant change to the DR architecture. The DSB estimates build cost of a primary / primary model at between €1m and €1.5m, with no additional run-cost implications. The resulting annual increase in costs within the communal cost recovery ring-fence would be between €250K and €375K per annum for the 4 years of build cost amortization.</p> <p>If approved, the DSB proposes to implement this approach by working with the TAC to agree the detailed design.</p> <p>Do you concur with implementation of this approach?</p>	<p>EVIA does not concur; the cost versus benefit of this approach is not worthwhile and should not be implemented.</p> <p>EVIA noted in the prior consultation that it would support the deployment of two “Multiple Primary Regions, but did not support any move towards moving to a dual-cloud deployment</p>
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### Section 5: Usage and Access Agreement

12.i	<p>There has been mixed response on the desire for differentiated agreement terms for intermediaries (e.g. data vendors or other institutions providing enhancement, storage or distribution of DSB Power User Data. Note that DSB Registered User Data (i.e. data drawn exclusively from end of day file downloads) is free to use and/or distribute, subject to third party terms.) vs. End Users.</p> <p>Do you believe audit rights should be incorporated within the agreement terms for such institutions?</p>	<p>Given that our recommendation would be to merge all user types, we do not have an opinion on this question.</p> <p>Adequate audit rights are commonplace and would flow from our recommendations to implement a transparent and open audit committee.</p>
12.ii	<p>Do you have a view on the specific terms you wish to see excluded/included within the user agreement for intermediaries? Please specify exact language and rationale for your proposal.</p>	<p>Given that our recommendation would be to merge all user types into a basic provision, we do not have an opinion on this question.</p>

### Section 6: AOB

13	Please insert any other comments you wish to provide	<ul style="list-style-type: none"><li>i. The consultation proposes new functionality and services costing £2.2-2.8m pa. This is an uplift of over 25% of the £8.8m figure provided in the consultation paper. Many “Power Users”, especially trading venues, do not need any of the additional functionality and therefore it is not proportionate to add these costs. All changes in the consultation paper should be outside of the cost recovery model, if added at all.</li><li>ii. We note that whilst, this consultation only considers 2019, the ANNA DSB have no provision for Brexit planning in their functional developments nor costings. These March 2019 scheduled events may well be deferred, but could impact all MiFID entities, most definitely including trading venues. Product and TA committees may want to engage with stakeholders on this topic.</li><li>iii. EVIA calls for a standard utility approach to ISIN provision via a small flat fee to MiFID firms</li><li>iv. We reiterate the premise that trading venues must produce ISINs for the benefit not only of customers, but for the entire MiFID community and their onward clients. Such provision of a utility service for which ISIN creators gain no revenue or competitive benefit and for which trading venues currently must absorb all costs as there is no pass-through model.</li><li>v. No additional functionality is required for trading venues. If the basic offering available to trading venues enables the ISIN to be provided to the market participants, then no other special arrangements are required.</li></ul>
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