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**Response to ANNA DSB Consultation Paper 2 dated 5 July 2019**

CP2 Qu#	Question for Consultation	Participant's Response
<b>FUNCTIONALITY</b>		
1	<b>CFI Codes for EMIR</b> 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?	Yes we agree the DSB should do this.
2	<b>Mapping to MiFID II Taxonomy</b> 2(a): Do you concur with the DSB's proposal to perform the analysis for MiFID II Taxonomy mapping? 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?	Yes we agree with the DSB should do this for OTC derivatives.
3	<b>Default values in ISIN Templates</b> 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?	Yes, assuming the DSB can handle any increased workload.
4	<b>Underlying Identifiers</b> 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?	Yes, assuming the DSB can handle any increased workload.
5	<b>GUI Enhancements</b> Do you concur with the DSB's proposal to implement a minimal set of search filters targeting occasional users?	Yes.

6	<p><b>Other Technical Enhancements</b></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, assuming the DSB can handle any increased workload.
<b>DATA SUBMISSION ENHANCEMENTS</b>		
7	<p><b>Tool for Proprietary Index Submissions</b></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>	Yes.
8	<p><b>SLA for Proprietary Index Submissions</b></p> <p>Do you concur with the DSB's proposal to keep unchanged the SLA for proprietary index submissions?</p>	Yes.
9	<p><b>Automated User Submission Process for Proprietary Indices</b></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>	Yes.
10	<p><b>Machine-Readable Format for Proprietary Indices</b></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>	Yes.
11	<p><b>LEI for CDS Single Name</b></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.
12	<p><b>Validation of CDS Single Name</b></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.
13	<p><b>Supplemental Data for ISIN-LEI Mapping</b></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, assuming the DSB can handle any increased workload.
14	<p><b>Mapping of Index Names to Underlying Identifiers</b></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.
15	<p><b>Data Review Process</b></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, assuming the DSB can handle any increased workload.
<b>SERVICE LEVELS</b>		

16	<b>Bulk ISIN Creation</b> Do you concur with the DSB's proposal to drop further analysis on bulk ISIN creation?	Yes.
17	<b>Searchable On-Line Utility</b> 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?	Yes, assuming the DSB can handle any increased workload.
18	<b>Phone-Based Support</b> Do you concur with the DSB's proposal to drop further investigation on phone support?	Yes.
19	<b>Proactive AUP Monitoring</b> 19(a): Do you concur with the DSB's proposal to implement the core functionality? 19(b): Do you concur with the implementation of the API functionality?	
<b>SERVICE AVAILABILITY</b>		
20	<b>Downtime Window</b> 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?	
<b>CYBER SECURITY</b>		
21	<b>GUI Multi-Factor Authentication</b> Do you concur with the DSB's proposal to implement a minimal MFA solution for the GUI?	
22	<b>Secure SDLC</b> Do you concur with the DSB's proposal to move forward with analysis of Secure SDLC?	
23	<b>ISO 27001/2 for Cyber Breach Risk</b> Do you concur with the DSB's proposal to move forward with the analysis phase for the implementation of the ISO27001/27002 framework?	
24	<b>ISO 27018 for PII Breach Risk</b> Do you concur with the DSB's proposal to take no further action?	
25	<b>On-Boarding of CISO</b> Do you concur with the DSB's proposal to on-board a part-time CISO with a full-time security engineer?	
<b>FEES AND USER AGREEMENT</b>		

26	<p>The current timeline for determination of annual fees is the first working day of December (DSB Charges Policy – paragraph 2.4 ). 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? (July / August / September / October / November / <b>December (unchanged)</b> / No opinion)</p>	<p>We need to know the fees for the next year as early as possible in order to put into our forecasts, therefore July.</p>
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 &amp; 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? (0-4% / 4-8% / 8-12% / No opinion)</p>	<p>0-4%</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? (Yes / No / No opinion)</p>	<p>Yes</p>
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? (No / Yes, 15% / Yes, 20% / Yes, 25%, Yes, 50% / No opinion / Other)</p>	<p>To be agreed on a case by case with each individual firm.</p>
30	<p>Please provide any additional user fee related feedback you wish to provide.</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>	
32	<p>Please use this space for any other comments you wish to provide.</p>	<p>Will the announcement in May 2019 that DSB will be (a) the service provider for the UPI, (b) sole issuer of UPI codes and (c) operator of the UPI reference data library, have any impact on ANNA DSB ambitions to</p>