

DERIVATIVES SERVICE BUREAU

2ND INDUSTRY CONSULTATION - 2020 DSB SERVICE PROVISION

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I. DSB BACKGROUND

What is the DSB?

- A technology **platform** which can generate an identification hierarchy for OTC derivatives
- Within its scope of OTC derivatives, it provides the industry with an archive of International Security Identifier Numbers (**ISINs**) and their associated **instrument reference data**
- It is **global** in design and operation, operated under the ISO principles including on a **cost recovery** basis

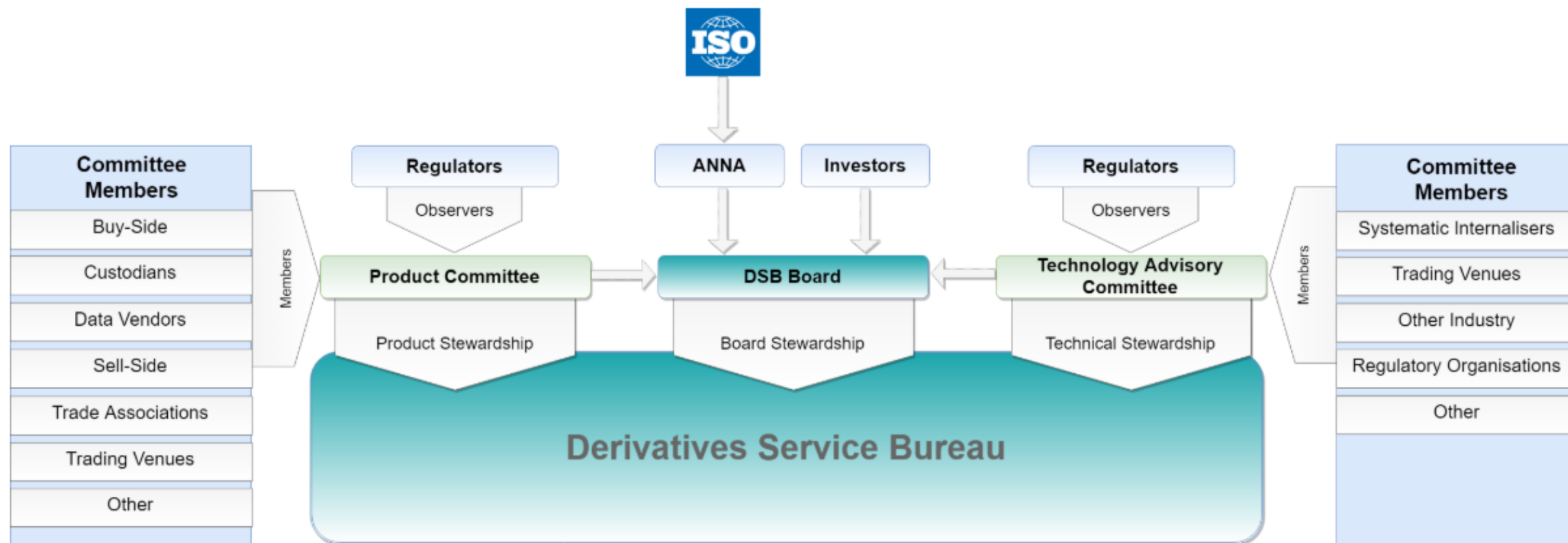
What does the DSB do?

- **ISIN, CFI and FISN generation** for OTC derivative product as required by market participants
- **Distribution of ISINs** and their associated reference data to market participants
- Interaction options include **web interface, programmatic connectivity** and **file download**
- Future generation of **Unique Product Identifiers (UPIs)**

Drivers

- **EU regulators** have **mandated** that ISINS identify instruments for **MiFID2 / MiFIR** reporting, including some **OTC derivatives**
- The **DSB** is the sole source of **ISINs for OTC derivatives** and was engineered to serve the needs of regulators and industry participants, to enable the industry to meet regulatory obligations
- The **DSB** has been **designated** by the FSB as the **sole UPI Service Provider** and operator of the Reference Data Library

2. DSB GOVERNANCE



3. KEY PRINCIPLES

Industry Stewardship

- Product definitions and maintenance is via industry-led Product Committee of market practitioners
- Technology Advisory Committee formed to advise on future evolutions of the DSB technology platform to address changing market requirements
- Public and transparent Industry Consultation process is open to all users to shape the evolution of the service

Cost Recovery

- The numbering agency services will be provided on a cost-recovery basis

Reasonable and Non-Discriminatory (RAND) Access and Use

- DSB ISINs and their associated data will have no licensing restrictions on usage and distribution for any purpose as part of the ISIN record
- Access to the DSB archive for consumption of OTC derivative ISINs and associated reference data will be available for free to all registered organizations and users

4. DSB CONSULTATION TIMELINE

Milestone	Date
User fees survey	Mon 4 - Fri 15 Mar 2019
Formation and meeting of the group-wide agreement forum	Mar-Apr 2019
Publication of 1st DSB 2020 consultation document (CP1)	Thu 9 May 2019
1st DSB 2020 consultation webinar - 2pm UK time	Thu 16th May 2019
Industry feedback re CP1	Thu 9 May - Wed 5 Jun 2019
Publication of 2nd DSB 2020 consultation document (CP2)	Fri 5 Jul 2019
2nd DSB 2020 consultation webinar @ 2pm UK time	Thu 11 Jul 2019
Industry feedback re CP2	Fri 5 - Mon 29 Jul 2019
DSB 2020 final consultation report published	Mon 19 Aug 2019
DSB 2020 draft user agreement (UA) publication	Mon 19 Aug 2019
Webinar to accompany draft UA publication @ 2pm UK time	Mon 26 Aug 2019
Deadline for industry feedback on proposed UA changes	Mon 2 Sep 2019
DSB 2020 final user agreement publication	Fri 20 Sep 2019
DSB 2020 final user agreement webinar @ 2pm UK time	Fri 20 Sep 2019



5. PROPOSED FORMAT FOR INDUSTRY RESPONSE

- Consultation responses to be completed using the form available [here](#) and emailed to industry_consultation@anna-dsb.com
- Appendix 3 Response template is designed to enable consolidation of industry feedback in a scalable manner
- Stipulate whether the respondent wishes the response 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 in order to ensure that the DSB can work to reflect the best target solution sought by industry as a whole (within the governance framework of the utility)
- **Responses must be received by 5pm UTC on Monday 29th July 2019**
- All consultation related queries should be directed to industry_consultation@anna-dsb.com

6. CONSULTATION OVERVIEW

- Incorporates queries and feedback received from industry, including the Product and Technology Advisory Committees, since the DSB's consultation in 2018
- Consultation Paper 1 (CPI) examined the topics of DSB Functionality; Data Submission Enhancements; Service Levels; Service Availability and Cybersecurity, with industry responses [published on the DSB website](#)
- Consultation Paper 2 (CP2) summarizes and analyses the industry responses to CPI and DSB proposed next steps
- Input has been obtained from the Technology Advisory Group (TAC) where appropriate
- Where the proposed next steps will have a cost impact on the 2020 service provision, the associated costs have been itemised to allow industry to understand the cost / benefits associated with each proposal for determination on next steps for enhancing the DSB's services within the communal cost recovery ring-fence
- Costs will only be incurred for those proposed changes that are supported by industry as part of CP2. The actual cost impact may be smaller or zero, subject to industry feedback

7. RESPONSE HIGHLIGHTS & COST SUMMARY

CATEGORY	DROPPED	FURTHER CONSULTATION	TOTAL	COST IMPACT
Functionality	0	6	6	<ul style="list-style-type: none"> 2020: € 30K 2021-2024: €365K pa 2025-: €230K pa
Data Submission Enhancements	2	7	9	<ul style="list-style-type: none"> 2020: € 60K 2021-2024: €155K pa 2025-: € 90K pa
Service Levels	2	2	4	<ul style="list-style-type: none"> 2020: None 2021-2024: €124K pa 2025-: € 60K pa
Service Availability	0	1	1	<ul style="list-style-type: none"> 2020: None
Cyber-Security	1	4	5	<ul style="list-style-type: none"> 2020: €470K 2021-2024: €385K pa 2025-: €335K pa
TOTAL	5	20	25	<ul style="list-style-type: none"> 2020: € 560K 2021-2024: €1,029K pa 2025-: € 685K pa

- Cost comparison is the 2019 DSB budgeted cost base of €9.14m
- There were 25 proposed changes in CPI
 - 5 have been dropped
 - 10 proposed to take forward as BAU, subject to PC and the TAC prioritisation
 - 10 proposed to take forward will incur incremental costs
- Costs shown in the table will only be incurred if the proposed changes are supported by industry as part of this consultation
- Capital expenditure in the year it is incurred will be funded by the DSB's financial sustainability margin and not from additional user fees. Capital expenditure is amortized over 4 years, starting from the year after the service goes live
- Operating expenditure is included from the year after the service goes live. Before this point, costs are treated as part of the capital expenditure

8. CONSULTATION QUESTIONS: FUNCTIONALITY

		NEXT STEPS	COST IMPACT
5.1.1	CFI Codes for EMIR	Further Consultation	<ul style="list-style-type: none"> • 2020: None • 2021-2024: €260K pa • 2025-: €160K pa
5.1.2	Mapping to MiFID II Taxonomy	Further Consultation	<ul style="list-style-type: none"> • 2020: € 30K pa
5.1.3	Default values in ISIN Templates	Further Consultation	<ul style="list-style-type: none"> • 2020-: None
5.1.4	Underlying Identifiers	Further Consultation	<ul style="list-style-type: none"> • 2020-: None
5.1.5	GUI Enhancements	Further Consultation	<ul style="list-style-type: none"> • 2020: None • 2021-2024: €105K pa • 2025-: € 40K pa
5.1.6	Other Technical Enhancements	Further Consultation	<ul style="list-style-type: none"> • 2020-: None
		TOTAL	<ul style="list-style-type: none"> • 2020: € 30K • 2021-2024: €365K pa • 2025-: €200K pa

- 6 questions requesting industry feedback on aspects of functionality
- Costs will only be incurred if the proposed changes are supported by industry as part of this consultation
- Capital expenditure in the year it is incurred will be funded by the DSB's financial sustainability margin and not from additional user fees. Capital expenditure is amortized over 4 years, starting from the year after the service goes live.
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8. CONSULTATION QUESTIONS: FUNCTIONALITY

I. CFI Codes for EMIR

- A small majority of respondents in favour of further exploration
- Feedback demonstrated a clear market need for such a service, but also highlighted a series of concerns that would need to be addressed if the DSB were to implement such a service
- Proposal to conduct analysis to document the expanded product coverage at launch, associated workflows and technology impact – overseen by the DSB PC and TAC as relevant (details below) proceed with implementation unless the analysis determines that forecast costs may be exceeded
- Cost Impact -

2020:	None
2021-2024:	€260K pa
2025-:	€160K pa

8. CONSULTATION QUESTIONS: FUNCTIONALITY

2. Mapping to MiFID II Taxonomy

- A majority of respondents requested further evaluation
- General interest exists in a mapping between ISIN and MiFID II Taxonomy, but further clarity on cost and value is required
- Proposed to undertake time-boxed analysis for a period of six months, with direct industry input via the DSB PC and TAC, requiring incremental increase
- Cost Impact - 2020: €30K pa

8. CONSULTATION QUESTIONS: FUNCTIONALITY

3. Default values in ISIN templates

- Mixed feedback on whether default values were helpful in DSB templates, with a slight preference for the retention of default values in DSB Product Definition templates
- 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 (subject to PC prioritization)
- Cost Impact - None

4. Underlying Identifiers

- A majority of respondents stated that they were broadly satisfied with the list of underlying identifiers currently available when creating OTC derivative identifiers via the DSB
- 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 (subject to PC prioritization)
- Cost Impact - None

8. CONSULTATION QUESTIONS: FUNCTIONALITY

5. GUI enhancements

- A mixed response with a slight majority in favour of providing better functionality, and a significant minority composed of trading venues seeing no need for any further capabilities
- Proposal to implement a limited set of search filters based on the feedback provided in CPI, liaising with the PC and the TAC to finalise the set of filters and reach agreement on the implementation approach
- Cost impact –

2020:	None
2021-2024:	€105K pa
2025-:	€ 40K pa

6. Other technical enhancements

- A mixed response with a slight majority not seeing any need for a substantial review of the DSB service to identify potential technical enhancements. The stability of the service was stated as a primary factor
- Proposal to work with the TAC to evaluate on a BAU basis, subject to TAC prioritization
- Cost Impact: None

9. CONSULTATION QUESTIONS: DATA SUBMISSION ENHANCEMENTS

		NEXT STEPS	COST IMPACT
5.2.1	Tool for Proprietary Index Submissions	None	• 2020-: None
5.2.2	SLA for Proprietary Index Submissions	None	• 2020-: None
5.2.3	Automated User Submission Process	Further Consultation	• 2020-: None
5.2.4	Machine-Readable Format for Proprietary Indices	Further Consultation	• 2020-: None
5.2.5	LEI for CDS Single Name	Further Consultation	• 2020: None • 2021-24: €155K pa • 2025-: € 90K pa
5.2.6	Validation of CDS Single Name	Further Consultation	• 2020-: None
5.2.7	Supplemental Data for ISIN-LEI Mapping	Further Consultation	• 2020-: None

		NEXT STEPS	COST IMPACT
5.2.8	Mapping of Index Names to Underlying Identifiers	Further Consultation	• 2020: €60K • 2021-: None
5.2.9	Data Review Process	Further Consultation	• 2020-: None
		TOTAL	• 2020: € 60K • 2021-2024 €155K pa • 2025-: € 90K pa

- 9 questions requesting industry feedback on aspects of data submission enhancements
- Costs will only be incurred if the proposed changes are supported by industry as part of this consultation

9. CONSULTATION QUESTIONS: DATA SUBMISSION ENHANCEMENTS

7. Tool for Proprietary Index

Submissions

- Few users provided a response, the majority did not see a need for the DSB to create a tool to enhance the proprietary index submission process
- No industry interest in a tool to enhance the proprietary index submission process
- No further action to be taken

8. SLA for Proprietary Index

Submissions

- Few users provided a response, the majority did not see a need for the current proprietary index submission and availability processes to be enhanced
- No industry interest in a tool to enhance the proprietary index submission process
- No further action to be taken

9. CONSULTATION QUESTIONS: DATA SUBMISSION ENHANCEMENTS

9. Automated User Submission Process

- The few users provided a response were in favour of the provision of an automated user submission process
- Proposal to work with the TAC to evaluate on a BAU basis, subject to TAC prioritization
- Cost impact: None

10. Machine-Readable Format for Proprietary Indices

- The few users provided a response were in favour of the provision of an automated user submission process
- Proposal to work with the TAC to evaluate on a BAU basis, subject to TAC prioritization
- Cost impact: None

CONSULTATION QUESTIONS: DATA SUBMISSION ENHANCEMENTS

11. LEI for CDS Single Name

- All respondents requested that the DSB investigate development of a link between the DSB and the ISIN-LEI service in order to provide the LEI in all instances where it is available
- Proposal to perform business and technical analysis to document the specific workflows required to source, integrate and publish the additional information in DSB CDS product templates. The DSB would work with the PC and the TAC to determine the best mechanism to leverage the LEI-ISIN mapping service in order to enrich the CDS OTC-ISIN record with the LEI in all instances where it is available
- Cost impact –

2020:	None
2021-2024:	€155K pa
2025-:	€ 90K pa

9. CONSULTATION QUESTIONS: DATA SUBMISSION ENHANCEMENTS

12. Validation of CDS Single Name

- Most respondents welcomed further efforts to improve data quality
- Proposal to examine the number of CDS Single Name ISINs that have been incorrectly created i.e. where the issuer type of the underlying bond does not match the DSB product template selected and work with the PC to determine next steps, if any
- Cost impact: None

13. Supplemental Data for ISIN-LEI Mapping

- The majority of respondents who provided an opinion were supportive of further investigation of supplemental data
- Further analysis to be undertaken on a business as usual resources as part of the existing PC secretariat, subject to prioritisation by the PC
- Cost impact: None

9. CONSULTATION QUESTIONS: DATA SUBMISSION ENHANCEMENTS

14. Mapping of Index Names to Underlying Identifiers

- All respondents who expressed a view supported further investigation of underlying index and/or reference rate names – with a focus on indices
- Proposal to perform the business and technical analysis, working with the PC to identify the specific asset classes that industry wishes the DSB to focus on, identification of the desired data sources, an examination of the workflows to integrate the additional data into DSB product templates and the effort to implement a solution to allow publication of the data in OTC derivative reference data records.
- This period of analysis will require additional DSB resource, resulting in an incremental increase
- Cost impact - 2020: 60K

9. CONSULTATION QUESTIONS: DATA SUBMISSION ENHANCEMENTS

15. Data Review Process

- Mixed responses indicating this issue is not urgent although some of the specific examples cited are useful input for the PC to consider as part of any review of data quality
- Proposal to review each of the requests with the PC for additional underlying data on a case by case basis as part of its business as usual, subject to PC prioritization
- Cost impact: None

10. CONSULTATION QUESTIONS: SERVICE LEVELS

		NEXT STEPS	COST IMPACT
5.3.1	Bulk ISIN Creation	None	• 2020-: None
5.3.2	Searchable On-Line Utility	Further Consultation	• 2020-: None
5.3.3	Phone-Based Support	None	• 2020-: None
5.3.4	Proactive AUP Monitoring - Core	Further Consultation	<ul style="list-style-type: none"> • 2020: None • 2021-2024: €82.5K pa • 2025-: €40K pa
5.3.4	Proactive AUP Monitoring - API	Further Consultation	<ul style="list-style-type: none"> • 2020: None • 2021-2024: €41.25K pa • 2025-: €20K pa
		TOTAL	<ul style="list-style-type: none"> • 2020: None • 2021-2024: €123.75K pa • 2025-: € 60K pa

- 4 questions requesting industry feedback on aspects of functionality
- Costs will only be incurred if the proposed changes are supported by industry as part of this consultation
- Capital expenditure in the year it is incurred will be funded by the DSB's financial sustainability margin and not from additional user fees. Capital expenditure is amortized over 4 years, starting from the year after the service goes live
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10. CONSULTATION QUESTIONS: SERVICE LEVELS

16. Bulk ISIN Creation

- The few users that provided a response were in happy with the creation of one OTC ISIN at a time
- The TAC in its 18 June meeting formed the view that DSB users should be guided to the DSB's API service where high volume activity was anticipated. In the light of the TAC's views and the receipt of only 2 respondents, there is insufficient justification to focus on bulk ISIN creation
- No further action to be taken

17. Searchable On-Line Utility

- Respondents were broadly in favour of having access to an on-line searchable utility
- Proposal to work with the TAC and PC to agree an appropriate design and functionality, alongside a cost and benefit analysis for inclusion in the DSB's annual consultation in 2020. This design and analysis effort to be undertaken as part of the DSB's business as usual resourcing and subject to PC and TAC prioritization.
- Cost impact: None

10. CONSULTATION QUESTIONS: SERVICE LEVELS

18. Phone-Based Support

- A mixed response to the proposal to provide phone support, with a small majority in favour of such a provision. A significant minority were not in favour, with primary focus being on costs, with some also noting that the major benefit of such a service would be primarily during a major incident and not during business as usual operations
- DSB's current processes require that in the event of a DSB outage and/or incident confirmed as a Critical (S1) or Major (S2) priority, the DSB technical support team will send email notifications to all impacted clients. The DSB will then continue to send progress updates every 30 minutes after the initial notification has been sent. The TAC is currently reviewing the DSB's Disaster Recovery procedures and any enhancements to the DSB processes will be made in line with the resulting recommendations
- No further action to be taken

10. CONSULTATION QUESTIONS: SERVICE LEVELS

19. (a) Proactive AUP Monitoring

- Unanimous responses in favour of exploring the implementation of operational processes so users can stay within AUP limits
- The DSB has submitted two proposals for consideration: one proposal for a core, low cost implementation of the functionality; and a second proposal for an API functionality on top of the core functionality
- Core implementation: a minimal core functionality via an automated email-based mechanism which automatically notifies all fee paying users upon breaching certain pre-configured thresholds (e.g. 75%, 90% and 100%)
- Cost Impact -

2020:	None
2021-2024:	€82.5K pa
2025-:	€ 40K pa

10. CONSULTATION QUESTIONS: SERVICE LEVELS

19. (b) Proactive AUP Monitoring

- API implementation: optionally implement an additional API-notification on top of the core functionality, to allow both REST and FIX users programmatic notification of threshold breaches. Precise functionality to be agreed with the TAC
- Cost Impact -

2020:	None
2021-2024:	€41.25K pa
2025-:	€ 20K pa

II. CONSULTATION QUESTIONS: SERVICE AVAILABILITY

		NEXT STEPS	COST IMPACT
5.4.1	Downtime Window	Further Consultation	• 2020-: None
		TOTAL	• 2020-: None

- A single question requesting industry feedback on service availability
- The CPI responses were reviewed at the 18 June 2019 TAC meeting

20. Downtime Window

- On balance responders were ok with the proposal, with only one negative comment. However, the number of responders was low
- Proposal to implement the downtime model to between 00:30AM Sunday UTC and 12:30PM Sunday UTC. This change incurs no incremental costs as it can be performed by existing business as usual resources
- Cost impact - None

12. CONSULTATION QUESTIONS: CYBERSECURITY

		NEXT STEPS	COST IMPACT
5.5.1	GUI Multi-Factor Authentication	Further Consultation	<ul style="list-style-type: none"> 2020: None 2021-2024: €95K pa 2025-: €45K pa
5.5.2	Secure SDLC	Further Consultation	<ul style="list-style-type: none"> 2020: €90K 2021-: None
5.5.3	ISO 27001/2 for Cyber Breach Risk	Further Consultation	<ul style="list-style-type: none"> 2020: €90K 2021-: None
5.5.4	ISO 27018 for PII Breach Risk	None	<ul style="list-style-type: none"> 2020-: None
5.5.5	On-Boarding of CISO	Further Consultation	<ul style="list-style-type: none"> 2020-: €290K pa
TOTAL			<ul style="list-style-type: none"> 2020: €470K 2021-2024: €385K pa 2025-: €335K pa

- 5 questions requesting industry feedback on aspects of functionality. The CPI responses were reviewed at the 18 June 2019 TAC meeting
- Costs will only be incurred if the proposed changes are supported by industry as part of this consultation
- Capital expenditure in the year it is incurred will be funded by the DSB's financial sustainability margin and not from additional user fees. Capital expenditure is amortized over 4 years, starting from the year after the service goes live
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12. CONSULTATION QUESTIONS: CYBERSECURITY

21. GUI Multi-Factor Authentication (MFA)

- Mixed responses with the majority supportive, but with a significant minority focusing on likely cost impact
- TAC reviewed the CPI responses at the 18 June TAC meeting and noted the GUI itself contains little personally identifiable information or other sensitive data however, it provides a doorway into the core system and therefore, robust cyber-security approaches should be considered.
- Risks have been articulated – gateway to core system, impersonation of internal support function, impersonation of a more privileged user and hiding true identity
- Proposal to to implement a minimal MFA solution with the narrow remit of only mitigating the identified risks. The solution would include self-provisioning as well as password expiry in order to minimize incremental on-going load on the support desk. TAC to be involved in the analysis and implementation
- Cost impact - 2020: None
 2021-2024: €95K pa
 2025-: €45K pa

12. CONSULTATION QUESTIONS: CYBERSECURITY

22. Secure Software Development Life Cycle (SDLC)

- All responses that expressed an opinion were supportive of a move to a secure SDLC model, given the risk of cyberattacks disrupting users' production environments
- TAC reviewed the CPI responses at the 18 June TAC meeting and there was general consensus for the DSB to explore the option of embedding security into every step of the software development lifecycle
- Proposal to perform the analysis on the adoption of ISO 27034 as its secure SDLC methodology, while also considering any additional items required by NIST that may be relevant. TAC to be involved in the analysis and implementation
- On the assumption that industry approves the on-boarding of the new CISO function (see Q25), the DSB proposes to move forward with the analysis phase in 2020, led by the CISO and in conjunction with the TAC
- Cost impact - 2020: €90K
 2021-: None

12. CONSULTATION QUESTIONS: CYBERSECURITY

23. ISO/IEC 27001 and ISO/IEC 27002 standards for cyber breach risk

- Large majority of responses were positive. One trade association did not see any use case given the low amount of personally identifiable information held by the DSB. All other respondents were supportive, with a general theme of ensuring cost-effectiveness of implementation
- TAC reviewed the CPI responses at the 18 June TAC meeting and there was general consensus for the DSB to explore the option of adopting an international standard as its cyber-security framework
- Proposal to move forward in principle with implementing the ISO27001/27002 framework on the assumption that industry approves the on-boarding of the new CISO function (see Q25), the DSB proposes to move forward with the analysis phase in 2020, led by the CISO and in conjunction with the TAC
- Cost impact -

2020:	€90K
2021-:	None

12. CONSULTATION QUESTIONS: CYBERSECURITY

24. ISO 27018 standard adoption for PII breach

- Mixed feedback on whether to explore adoption of ISO 27018 for addressing PII data breach risks
- TAC reviewed the CPI responses at the 18 June TAC meeting and there was general consensus that the minor amount of PII data stored by the DSB did not provide sufficient value to continue with exploration of ISO 27018 adoption
- No further action to be taken

12. CONSULTATION QUESTIONS: CYBERSECURITY

25. On-boarding of Chief Information Security Officer

- All respondents were generally supportive, with comments ranging from whether the headcount could be absorbed within the existing management structure and the potential for the role to be part-time, to the need for additional technology risk support team members to support in answering users' cyber-security risk questionnaires. One trade association did not see any use case given the public and transparent nature of the data held by the DSB
- TAC reviewed the CPI responses at the 18 June TAC meeting and there was general consensus for the DSB to explore the creation of an independent CISO role along with an IT security engineer to provide analysis and implementation capability to the CISO
- TAC consensus settled on a proposal of 0.4 FTE CISO + 1 FTE IT security engineer, to be separate from the core management function, as per accepted best practice. TAC to be involved in matters relating to CISO role, remit and prioritization of activities
- Cost impact: 2020-: €290K pa

13. CONSULTATION QUESTIONS: FEES & USER AGREEMENT

- Commitments were made in the Final Consultation Report of 2018 to -
 - a) Work with industry in 2019 to review and agree the way forward
 - For determination of an appropriate fee model, including timelines for the annual fee review cycle, such that both simple and multi-faceted organizations could use a single model to predict expected fees
 - To review the user agreement to allow for users to more easily paper with the DSB, such that a single agreement could be used across multiple user categories
 - b) Review alignment of the fee revision cycle with the industry budgetary processes in the course of 2019
 - c) Publish timely audited financial accounts following the DSB's first full year of operation - <https://www.anna-dsb.com/financial-accounts/>
- Given the potential implications on the annual user fee calculation and contract terms which are common amongst all users, the DSB has an obligation to ensure due consideration is placed on the values of fair and equitable treatment of the broad and varied OTC ISIN, CFI and FISN user community

13. CONSULTATION QUESTIONS: FEES & USER AGREEMENT

User Fee Survey – revisiting the 6 questions from the March survey

26. Preferred annual fee communication timeline – Currently first week of December
 27. Cost adjustment for build & run related uplift – Currently only adjusted following annual consultation
 28. Should the fee model remain unchanged?
 29. Level of discount for multiple agreements – If agreed, what level of discount?
 30. Other fee related feedback
- Results were inconclusive
 - Amendment to the fee model including discounted fees for those users with multiple agreements means any revenue reduction will need to be recovered by the user base to ensure cost recovery of the service
 - Representation and feedback is required across the broad spectrum of DSB users, not just those with multiple agreements

13. CONSULTATION QUESTIONS: FEES & USER AGREEMENT

26. Formation of the DSB Agreement Forum

- To engage an industry forum comprising a broad range of DSB users in order to review the user agreement to allow for users with multiple agreements to more easily paper with the DSB
- DSB extended an invitation to 16 fee paying users across a range of user types and entity categorisations, including those with multiple and single agreements., only 3 parties expressed an interest in participating
- Proposal to move forward with establishment of the DSB Agreement Forum with those participants who have expressed an interest as well as, ask for any other interested parties to express their interest by 1st September 2019
- Once established, the DSB Agreement Forum will commence work in Q4 2019 with the aim for recommendations and proposals to be included in the annual industry consultation in 2020
- Expressions of interest to participate should be directed to secretariat@ANNA-DSB.com

PROPOSED FORMAT FOR INDUSTRY RESPONSE

- Consultation responses to be completed using the form available [here](#) and emailed to industry_consultation@anna-dsb.com
- Appendix 3 Response template is designed to enable consolidation of industry feedback in a scalable manner
- Stipulate whether the respondent wishes the response 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 in order to ensure that the DSB can work to reflect the best target solution sought by industry as a whole (within the governance framework of the utility)
- **Responses must be received by 5pm UTC on Monday 29th July 2019**
- All consultation related queries should be directed to industry_consultation@anna-dsb.com

13. FURTHER INFORMATION

- Product documents, user notifications, FAQs & operational status: <https://www.anna-dsb.com/>
- Industry consultation reports and feedback: <https://www.anna-dsb.com/industry-consultation/>
- Regular DSB blogs: <https://www.anna-dsb.com/blog/>
- Technical documentation: <https://github.com/anna-dsb>
- Request registration: Production and UAT
- DSB Financial Accounts: <https://www.anna-dsb.com/financial-accounts/>
- DSB Fee Model Variables: <https://www.anna-dsb.com/fee-model-variables/>
- DSB User Fees: <https://www.anna-dsb.com/fees-rules-2019/>
- General questions: secretariat@anna-dsb.com

Thank you!