Division Bank and Insurance
Austrian Federal Economic Chamber
Wiedner Hauptstraße 63 | P.O. Box 320
1045 Vienna
T +43 (0)5 90 900-DW | F +43 (0)5 90 900-272
E bsbv@wko.at
W http://wko.at/bsbv

EBA-CP-2013-18@eba.europa.eu

Your ref., Your message of	Our ref., person in charge	Extension	Date
	BSBV 115/Dr. Egger/St	3137	12 August 2013

EBA – Consultation on draft ITS on additional liquidity monitoring metrics (EBA/CP/2013/18)

The Division Bank and Insurance of the Austrian Federal Economic Chamber, as representative of the entire Austrian banking industry, appreciates the possibility to comment on the EBA – Consultation on draft ITS on additional liquidity monitoring metricsand would like to submit the following position:

Q1: Are the proposed remittance dates feasible?
Does the specification in paragraph 2 give sufficient clarity on which flows are included and excluded for the purpose of this RTS? If not, please provide us with an alternative specification.

A remittance period of 15 days is feasible to us.

Q2: Are the proposed frequency dates feasible? Has the proportionality been adequately considered?

Monthly reporting is feasible.

Q4: Are the reporting templates and instructions sufficiently clear? Shall some parts be clarified? Shall some rows/columns be added or deleted?

In order to reduce the effort of implementation the structure of the maturity ladder shall be as far as possible in line with the structure of the LCR template. Currently this is not the case.

Moreover some questions arise concerning the content of the template for behavioral flows in the maturity ladder:
Does the maturity ladder template for behavioral flows only include flows that are not part of the contractual template? Does it only include expected flows that are not contractual?
Does the template for behavioral flows include all products?

Q5: Could you indicate whether all the main drivers of costs and benefits have been identified in the table above? Are there any other costs or benefits missing? If yes, could you specify which ones?

The structure of the maturity ladder is different from LCR reporting and requires additional information (i.e. additional time buckets, expected cashflows in the behavioral part), therefore we assume a higher impact on costs especially under section A1. and B1.
Even if information for concentration of funding and rollover of funding is available, the reports have to be set up and monitored.

Q6: For institutions, could you indicate which type of costs (A1, A2, A3) are you more likely to incur? Could you explain what exactly drives these costs and give us an indication of their expected scale.

A1: record keeping and monitoring systems is most likely to incur, driven by amount of data needed and by additional templates of various structure.

Q7: Do you agree with our analysis of the impact of the proposals in this CP? If not, can you provide any evidence or data that would explain why you disagree or might further inform our analysis of the likely impacts of the proposals?

As already stated above we assume a higher impact on A1 and B1 costs, mainly for the following reasons:

- The behavioral template includes expected cash flows, which are not yet taken into consideration for LCR/NSFR reporting.
- The timebands in the maturity ladder are different from LCR and also from NSFR reporting.
- The structure of the maturity ladder template is different form the LCR template and for some positions more detailed.
- Funding prices are not included into the liquidity risk reporting, yet.

The roll-over of funding shall not only be provided for the current as of date, but also forward looking for the next 30 as of days. This information has to be calculated especially for this report.

Kindly give our remarks due consideration.

Yours sincerely,

Dr. Franz Rudorfer
Managing Director
Division Bank & Insurance
Austrian Federal Economic Chamber