

**Email**

Mr Arnoud VOSSEN  
Secretary General  
Committee of European Banking Supervisors  
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Brussels, 6 May 2010

**Subject:** *EBF response to CEBS' Consultation paper on implementation guidelines on Article 106(2) (c) and (d) of Directive 2006/48/EC recast (CP 38)*

Dear Mr Vossen,

The European Banking Federation<sup>1</sup> (EBF) welcomes the opportunity to comment on CEBS' proposed guidelines for the implementation of Article 106(2) (c) and (d) of the revised Capital Requirements Directive (2009/111/EC).

The EBF moreover wishes to underline the positive preparatory work to the consultation paper between CEBS and the industry through CEBS' Industry Expert Group, which, from the EBF point of view, led to broadly clear draft implementation guidelines.

You will find attached our responses to the questions raised in CP 38.

Please do not hesitate to contact us should you have any question.

Yours faithfully,



Guido RAVOET

Enclosure: 1 (D0748A-2010)

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a.i.s.b.l. <sup>1</sup> Set up in 1960, the European Banking Federation (EBF) is the voice of the European banking sector. It represents the interests of over 5000 European banks, large and small, from 31 national Banking Associations, with assets of more than EUR 20 000 billion and over 2.4 million employees.  
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