

ACPZ's answer to the questionnaire on the identification of users needs on credit institutions Pillar 3 disclosures

Dear sir:

The European Banking Authority (EBA) has published in its web site a questionnaire on the identification of users needs on credit institutions Pillar 3 disclosures. The process is opened by 27 th of April 2012.

In this questionnaire it can read questions about Risk Weight Assets (RWA).

As Developers-Builders Association of Zaragoza (ACPZ), from Spain, we want to participate in this process. By APCE, we also will suggests UEPC/FIEC to assess to take part in it, focusing in RWA and in their relation-ship with housing mortgages, taking into account ACPZ and APCE's point of view of this matter, which is already known by UEPC/FIEC (see the file attached) in order to ease the access to the credit to the housing market through a new scheme to calculate capital requirements for credit risk taking into account adherence to affordability housing's principles where the weighting is concerned.

The same position which is supported by us and APCE has been recently approved in Switzerland.

Kind regards.

José Luis Roca Castillo
President of
Developers-Builders Association of Zaragoza (ACPZ)