



30 July 2012

Mr. Adam Farkas  
Director General  
European Banking Authority  
Tower 42  
25 Old Broad Street  
London EC2N 1HQ  
United Kingdom

Deutsche Bank AG  
Winchester House  
1 Great Winchester Street  
London EC2N 2DB

Tel: +44 20 7545 8000

Direct Tel +44 20 7545 1903  
Direct Fax +44 20 7547 4179

CP-2012-4@eba.europa.eu

Dear Mr. Farkas

***DB's response to the European Banking Authority's consultation on disclosure for Own Funds by institutions***

Deutsche Bank (DB) welcomes the opportunity to respond to the EBA's consultation on disclosure for Own Funds. We support EBA's objective of harmonised disclosure templates and facilitating cross-jurisdictional comparisons. Any discrepancies between the EU and Basel frameworks should be limited to necessities which are well justified.

After comparing the EBA's approach to disclosure of own funds alongside the similar exercise undertaken by the Basel Committee on Banking Supervision's (BCBS) through their final guidance on definition of capital disclosure we support in general the approach you propose to take.

That said the current proposed templates would produce very granular and detailed information, which may not be optimal from a users perspective. One way to overcome this without deviating from Basel would be a "careful and meaningful" application of these forms whereby the "main features template" is used retrospectively only for the most significant issuances (potentially based on a threshold in relation to the institution's regulatory capital) and then applied in full for all new issuances after the implementation date.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'A. Procter', with a long horizontal stroke extending to the right.

Andrew Procter  
Global Head of Government and  
Regulatory Affairs