AXIOM SL
software laboratories, inc.

**Axiom's response to EBA CP Consultation Paper on the XBRL Taxonomy
related to the EBA final draft ITS on Supervisory Reporting Requirements
under the draft CRR**

<u>**Introduction**</u>

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Axiom is pleased to respond to this consultation on the XBRL taxonomy.

Please see below our questions:

(i)   We have a question regarding 'dimension-driven' measures. It seems like those measures have link to a domain, so we'd expect to see members names used on the face of return (C14 CR SEC Details), like 'Securitisation'. But in your 'instructions' documents you ask us to populate one letter codes: S, R, K, T. We found that these one letter codes do not exist in any domain.

(ii)   Will the EBA be issuing updated copy of the DPM (the tables with data about dimensions etc.) along with the every release of Taxonomy (which we assume will be a zip)?

In addition to these questions we have also included to this letter a separate annex which highlights other questions which we would like the EBA to consider.

Yours sincerely,

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Annex 1 – Further Technical questions for the EBA

1. Report Definition files

a. Listing includes vs. excludes in Definition files.
In all *def* files (e.g. *c_01.00-def.xml*) you use "http://xbrl.org/int/dim/arcrole/all" arcrole. Is there any chance that you'll use "http://xbrl.org/int/dim/arcrole/**notAll**" relationship in future Taxonomies?

b. Use of Default Member in report definition.
We base the notion of default member on http://xbrl.org/specification/dimensions/rec-2012-01-25/dimensions-rec-2006-09-18+corrected-errata-2012-01-25-clean.html#sec-default-values-for-dimensions

You are using default members of most dimensions extensively in report definition (*def*) and rendering (*rend*) files, for example in *c_01.00-def.xml* inside hypercube:

> <link:definitionLink xlink:type="extended" xlink:role="http://www.eba.europa.eu/xbrl/crr/role/fws/COREP/ITS-2013-02/2013-09-18/tab/C_01.00/1">

Default members carry no business meaning on their own (e.g. "All/Not Applicable"), and they are omitted from the xbrl instance file. Do you attach any special meaning to the usage of default members, or are they simply equivalent to the lack of the corresponding dimension in a hypercube/definition node?

Can we omit them in *rend* and *def* files as they do not figure in resulting xbrl instance?

c. Use of Default Member when overriding dimension members inherited from parent definition node in rend file.
See the example in *c_02.00-rend.xml:*

Definition node *eba_c100* contains dimension member APR:x45

```
<table:ruleNode xlink:type="resource" xlink:label="eba_c100" id="eba_c100">
  <formula:concept>
    <formula:qname>eba_met:mi310</formula:qname>
  </formula:concept>
  <formula:explicitDimension dimension="eba_dim:MCY">
    <formula:member>
      <formula:qname>eba_MC:x193</formula:qname>
    </formula:member>
  </formula:explicitDimension>
  <formula:explicitDimension dimension="eba_dim:APR">
    <formula:member>
      <formula:qname>eba_AP:x45</formula:qname>
    </formula:member>
  </formula:explicitDimension>
  <formula:explicitDimension dimension="eba_dim:TRI">
    <formula:member>
      <formula:qname>eba_TR:x5</formula:qname>
    </formula:member>
  </formula:explicitDimension>
  <formula:explicitDimension dimension="eba_dim:PRP">
```

```
          <formula:member>
            <formula:qname>eba_PL:x10</formula:qname>
          </formula:member>
        </formula:explicitDimension>
      </table:ruleNode>
```

but its child node *eba_c143* has APR:x45 member overridden by a default member ARP:x0

```
        <table:definitionNodeSubtreeArc xlink:type="arc" xlink:arcrole="http://xbrl.org/arcrole/PWD/2013-05-17/definition-node-
        subtree" xlink:from="eba_c100" xlink:to="eba_c143" order="3" />
        <table:ruleNode xlink:type="resource" xlink:label="eba_c143" id="eba_c143">
          <formula:concept>
            <formula:qname>eba_met:mi235</formula:qname>
          </formula:concept>
          <formula:explicitDimension dimension="eba_dim:MCY">
            <formula:member>
              <formula:qname>eba_MC:x197</formula:qname>
            </formula:member>
          </formula:explicitDimension>
          <formula:explicitDimension dimension="eba_dim:TRI">
            <formula:member>
              <formula:qname>eba_TR:x1</formula:qname>
            </formula:member>
          </formula:explicitDimension>
          <formula:explicitDimension dimension="eba_dim:PRP">
            <formula:member>
              <formula:qname>eba_PL:x11</formula:qname>
            </formula:member>
          </formula:explicitDimension>
          <formula:explicitDimension dimension="eba_dim:APR">
            <formula:member>
              <formula:qname>eba_AP:x0</formula:qname>
            </formula:member>
          </formula:explicitDimension>
        </table:ruleNode>
```

First of all, it seems illogical that a child node which should represent a subset of a data from a parent node, has a broader filter by dimension ARP than a parent node. But given the fact that all other dimension members involved are different from child to parent, it may be possible.

Second, are we correct in interpreting the default member ARP:x0 as the absence of dimension ARP, and the corresponding filter, in the hypercube corresponding to the child definition node? In other words, data that constitutes node *eba_c143* is not constrained by dimension ARP, unlike its parent node *eba_c100*?

2. Issues with Member Hierarchies in Domains

a. One-member hierarchies

Hierarchy *MC131* of the domain MC has only one member:

```
        <link:definitionLink xlink:type="extended" xlink:role="http://www.eba.europa.eu/xbrl/crr/role/dict/dom/MC/MC131">
          <link:loc xlink:type="locator" xlink:href="../exp.xsd#eba_MC" xlink:label="loc_eba_MC" />
          <link:loc xlink:type="locator" xlink:href="mem.xsd#eba_x156" xlink:label="loc_eba_x156" />
          <link:definitionArc xlink:type="arc" xlink:arcrole="http://xbrl.org/int/dim/arcrole/domain-member"
        xlink:from="loc_eba_MC" xlink:to="loc_eba_x156" order="1" />
        </link:definitionLink>
```

Is it correct? What is the point of defining a 1-member hierarchy, when there are other members of domain which are not part of any hierarchy? Why some members are not part of hierarchies, but others are part of 1-member hierarchies?

b. Wrong use of partial-breakdown

Member *x54* of domain AP is, in fact (from a business standpoint – see member labels), a complete breakdown of its children, but is declared as partial-breakdown (and there are other such examples):

```
<link:calculationLink xlink:type="extended" xlink:role="http://www.eba.europa.eu/xbrl/crr/role/dict/dom/AP/AP10">
  <link:loc xlink:type="locator" xlink:href="mem.xsd#eba_x0" xlink:label="loc_eba_x0" />
  <link:loc xlink:type="locator" xlink:href="mem.xsd#eba_x54" xlink:label="loc_eba_x54" />
  <link:calculationArc xlink:type="arc" xlink:arcrole="http://www.eurofiling.info/xbrl/arcrole/partial-breakdown"
xlink:from="loc_eba_x0" xlink:to="loc_eba_x54" weight="1" order="1" />
  <link:loc xlink:type="locator" xlink:href="mem.xsd#eba_x12" xlink:label="loc_eba_x12" />
  <link:calculationArc xlink:type="arc" xlink:arcrole="http://www.eurofiling.info/xbrl/arcrole/partial-breakdown"
xlink:from="loc_eba_x54" xlink:to="loc_eba_x12" weight="1" order="1" />
  <link:loc xlink:type="locator" xlink:href="mem.xsd#eba_x42" xlink:label="loc_eba_x42" />
  <link:calculationArc xlink:type="arc" xlink:arcrole="http://www.eurofiling.info/xbrl/arcrole/partial-breakdown"
xlink:from="loc_eba_x54" xlink:to="loc_eba_x42" weight="1" order="2" />
  <link:loc xlink:type="locator" xlink:href="mem.xsd#eba_x4" xlink:label="loc_eba_x4" />
  <link:calculationArc xlink:type="arc" xlink:arcrole="http://www.eurofiling.info/xbrl/arcrole/partial-breakdown"
xlink:from="loc_eba_x54" xlink:to="loc_eba_x4" weight="1" order="3" />
  <link:loc xlink:type="locator" xlink:href="mem.xsd#eba_x2" xlink:label="loc_eba_x2" />
  <link:calculationArc xlink:type="arc" xlink:arcrole="http://www.eurofiling.info/xbrl/arcrole/partial-breakdown"
xlink:from="loc_eba_x54" xlink:to="loc_eba_x2" weight="1" order="4" />
</link:calculationLink>
```

c. Logically unrelated members are joined in a hierarchy, or incomplete hier-cal files, or both
Problem with hierarchy TR1 of domain TR

```
<link:definitionLink xlink:type="extended" xlink:role="http://www.eba.europa.eu/xbrl/crr/role/dict/dom/TR/TR1">
```

 is that members x10 and x12 of the hierarchy are logically not related to members listed as their children (from business point of view) => they should not be part of the hierarchy

 Also, info about x10 and its descendants is missing from corresponding *hier-cal* file (rightfully so, as they are logically not related)

In MC domain, there are various logical problems with hierarchies:

  x156 (Instruments subject to market risk) is a partial-breakdown parent of x172 (On-balance sheet items) and x176 (Off-balance sheet items), which should have no relation to x156, as any member (in our case, on/off balance sheet) is defined (in business sense) not in context of a hierarchy but in context of a dimension. In our case, on/off balance sheet items may well include items other than instruments subject to market risk.

  x25 (All assets) and x31 (All liabilities) are both declared parents of x99 (Derivatives), whereas Derivative definition has no relation to being classified as asset or liability.

  Same is true for x130 (Equity instruments) and x60 (Debt securities) and others declared as children of x409 (Collateral received).

d. Use of the wrong Member as the filter on report/root of the Hierarchy

In report *c_15.00-rend.xml* we see a filter which is supposed to list all countries:

```
<df:explicitDimension xlink:type="resource" xlink:label="eba_a3.root.filter" id="eba_a3.root.filter">
   <df:dimension>
     <df:qname>eba_dim:CEG</df:qname>
   </df:dimension>
   <df:member>
    <df:qname>eba_GA:AL</df:qname>
    <df:linkrole>http://www.eba.europa.eu/xbrl/crr/role/dict/dom/GA/GA_X</df:linkrole>
    <df:arcrole>http://xbrl.org/int/dim/arcrole/domain-member</df:arcrole>
    <df:axis>descendant-or-self</df:axis>
   </df:member>
 </df:explicitDimension>
```

The member eba_GA:AL appears to be the root of the hierarchy
"http://www.eba.europa.eu/xbrl/crr/role/dict/dom/GA/GA_X"

while the actual member of the domain eba_GA:AL is ALBANIA (a specific country).

It should not be the root of this hierarchy. Is eba_GA:AL mistaken for the "All" member?

3. XBRL Instance-related questions

a. Varying periods for one measure/one instance

In the prior version of FINREP xbrl taxonomy, in in report c26.0, for measure mi53, we have seen the following *different* period declarations:

```
<formula:period>
 <formula:instant value="$refPeriodStartDate - xs:dayTimeDuration('P1D')" />
</formula:period>

<formula:period>
 <formula:instant value="$refPeriodEndDate" />
</formula:period>
```

I.e. different periods for the same measure *for the same context* reported in the same xbrl instance.

In the current taxonomy, such periods are not present. Are there any plans to have those type of period declarations in the future?

b. Units in xbrl instance

Why does *every* sample instance file include PURE units declaration, even though there are no PURE measures in that file? Is such declaration mandatory?

Can same measure be used to report amounts in *different currencies* within one xbrl instance file, or one report (in same/different contexts)? If yes, they would have to be associated with different units.

c. Handling missing facts in xbrl instance

In current taxonomy, all measures are declared as *nillable.* Is it possible in the future to have measures with *nillable=false*?

What is the preferred way to report missing facts (e.g. a context for which a reporting Bank has no data – e.g. no transactions or balances)? They can be reported as either:

- a fact value of 0
- a fact record with nil=true
- not reported at all (fact record missing in xbrl instance file)

In all validations you use fallbackValue=0, hence fact values may be omitted? What is the preferred approach?

d. Other questions/concerns

In validations, fallbackValue=0 is used even for non-numeric measures. That would make validations fail (*possibly with a strange message*) if a non-numeric fact is omitted and there is a validation formula concerning it. Is that normal?

Do you provide a specific way/instruction in taxonomy to negate fact values such as for:

```
  <label:label xlink:type="resource" xlink:label="label_eba_c413" xml:lang="en" xlink:role="http://www.xbrl.org/2008/role/label">OF WHICH: (-) GOODWILL / (+) NEGATIVE GOODWILL</label:label>
```

We have found no such indication.