Deutsche Bank

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Dear Mr. Farkas,

Deutsche Bank's response to the European Banking Authority's Consultation Paper on XBRL Taxonomy (v2.1) related to remittance of supervisory data under Regulation (EU) No 575/2013 (EBA/CP/2014/03)

Deutsche Bank (DB) welcomes the opportunity to comment on the EBA's consultation paper on the revised eXtensible Business Reporting Language (XBRL) taxonomy used for supervisory reporting under Capital Requirements Regulation (CRR).

We would like to reiterate our support in using XBRL Taxonomy for FinRep/CoRep submissions as we have expressed in our response to the earlier EBA consultation (EBA/CP/2013/36). We remain supportive of the use of the XBRL Taxonomy for regulatory submissions and the use of the Taxonomy by all competent national supervisory authorities. We believe that this will promote convergence of supervisory practices and facilitate cross-border supervision.

Our only comments on the revised consultation relate to inconsistencies of XBRL Taxonomy and ITS-Templates which we believe are important and need to be resolved for the XBRL Taxonomy to be successfully implemented and widely adopted.

Specifically, we noticed the differences between tables expressed by the Table Linkbase in the XBRL Taxonomy and the templates (Excel visualizations) of the ITS legal texts (this holds true for both Taxonomy version V2.0 and V2.1). We notice that some tables in the ITS templates are split in the XBRL Taxonomy table views (e.g. table C07.00 is split into table C_07.00.a and table C_07.00.b). We find that this inconsistency may cause significant misunderstandings between business users and IT in implementing the rules.

We have noticed the reasons for these differences in tables were outlined in the documentation and understand that it might be necessary to have tables split for technical reasons. However, we think this discrepancy will cause misunderstandings between IT who would want to file based on technical standards (tables C_07.00.a and C_07.00.b) and business users who would want to file from a legal perspective (table C07.00). Having two conflicting views (one from IT and the other from business) on how to implement these rules would negatively reflect on the overall acceptance of XBRL Taxonomy among users. This risk is heightened by the fact that rendering of tables as defined by the XBRL Table Linkbase specification does not cover a case of "merging" tables which would allow a single view on for example table C_07.00.

We would, therefore, suggest that the table views defined in XBRL Taxonomy should be aligned with the legal template views defined in the ITS.

We would be pleased to discuss further any aspect of our response.

Yours sincerely,

Andrew Procter
Global Head of Compliance, Government and
Regulatory Affairs