



THE ASSOCIATION OF RUSSIAN BANKS
(Moscow, Russia)
URL: <http://arb.ru/>

October 17, 2014

European Banking Authority
www.eba.europa.eu

Dear Sirs,

European Banking Authority
Consultation Paper «Guidelines on criteria for the assessment
of other systemically important institutions (O-SIIs)»

On behalf of the Association of Russian Banks (the ARB), and particularly the ARB Committee on standards of Basel II and Risk Management, we would like to thank the European Banking Authority for the opportunity to deliver our opinion on the Consultation Paper ««Guidelines on criteria for the assessment of other systemically important institutions (O-SIIs)» published for discussion on July 18, 2014 at <http://www.eba.europa.eu/regulation-and-policy/own-funds/guidelines-on-criteria-to-to-assess-other-systemically-important-institutions-o-siis-/-/regulatory-activity/press-release>

We hope our comments (annex on 1 page) would be of use for further development of the prudent international regulatory framework and stimulate its implementation.

In case of further questions, please, do not hesitate to get in touch with us through e-mail (z.adam@arb.ru or arb@arb.ru), telephone (+7.495.690.30.00) or fax (+7.495.690.31.38).

Zeyn ADAM

Co-Chairman of the Committee on
Basel II and Risk Management
The Association of Russian Banks

Henry PENIKAS, PhD.

Head of Standing Group on
Basel III within the Committee
The Association of Russian Banks

№	Par.	Page	Suggestion	Rationale
1	2	5	We suggest to disclose the data also to academic environment.	This would help to calibrate the weights / scores, etc.
2	Question 1	10	We suggest the off-balance sheet items to be included in Table 1 of Annex 1.	From Table 1 of Annex 1 (page 19) there is not obvious within absolute measures for D-SIB whether off-balance sheet items (absolute or risk-weighted) should be used together with balance sheet size and total assets (absolute or risk-weighted) in MS.
3	Question 2	11	In our point of view, the answer depends on concentration in Member States.	If concentration in Member States is low, small institutions matter; otherwise – not.
4	12	11	We suggest to include in the assessment all Member States, including investment firms.	For the purpose of transparency, comparison and consistency of assessments all MS should be taken into consideration.
5	Table 1	13	We suggest to justify Weight proposed for such indicator as total assets and make it aligned with those for systemically important banks – 20%.	The same EBA requirements for systemically important banks suppose 20% weight and for systemically important insurance companies – 5%. The origin of current weight in 25% proposed by the document is unclear.
6	3	21	We suggest to indicate whether investment firms were included in cluster analysis for cut-off scores calculation.	If investment firms were not included, the assessment would be shifted and review is required.