



**EUROPEAN CENTRAL BANK**  
BANKING SUPERVISION

## Template for comments

### Public Consultation on Money Market Statistics Regulation

**Institution/Company**

German Banking Industry Committee (GBIC/DK)

**Contact person**

**Mr/Ms**

**First name**

**Surname**

**Email address**

**Telephone number**

Please tick here if you do not wish your personal data to be published.

**General comments**

Register of Interest Representatives

Identification number in the register: 52646912360-95

# Template for comments

## Public Consultation on Money Market Statistics Regulation

Please enter all your feedback in this list.

When entering feedback, please make sure that:

- each comment deals with a single issue only;
- you indicate the relevant Article/Annex, where appropriate;
- you indicate whether your comment is a proposed amendment, clarification or deletion.

**Deadline:** 10 September 2018

ID	Article, annex and/or table of the draft regulation	Page	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board
1	Article 3 (1)	3	Clarification	In terms of EFTA-States and EFTA located branches we plead for using the dummy-code "XXXXXXXXXXXXXXXXXXXX99" in the reporting template (refer also to Art. 4 Abs. 1 S. 1 MMSR).	European harmonization
2	Annex I PART 2 "Counterparty identification"	7	Clarification	We point out that the Legal Entity Identifier (LEI) used should not be validated by the reporting institution. Further, a harmonization of the European transaction based reporting schemes should be granted. The realizations "Issued", "Pending transfer" "Pending archival" or "Lapsed" of the MMSR-reporting should be linked to Art. 9 EMIR-"Validation Rules" (ESMA, 09.08.2018) or Art. 26 MiFIR-"Validation Rules" (ESMA, 15.06.2018).	reduction of reporting burden
3	Annex I PART 2 "Counterparty identification"	7	Clarification	In accordance with Art. 9 EMIR-"Validation rules" (ESMA, 09.08.2018) the dummy-code "XXXXXXXXXXXXXXXXXXXX99" should be reported for non-EEA entities that do not have LEI (refer to field Nr. 84).	European harmonization
4	Annex I PART 2 "Reported transaction status"	7	Clarification	For simplification reasons we are in favor of submitting corrections of a previously reported transaction of the current and at most the last two reporting years (refer to the principles of the German reporting on foreign trade and payments transactions).	reduction of reporting burden
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