



Discussion on a Feasibility Study of an Integrated Reporting System under Article 430c CRR

Consultation form



The EBA invites comments on all proposals put forward in this paper and in particular on the specific questions detailed below.

Comments are most helpful if they:

- respond to the question stated;
- indicate the specific point to which a comment relates;
- are supported by a clear rationale;
- provide evidence to support the views expressed/ rationale proposed; and
- provide alternative regulatory options for consideration by the EBA.

Response details

General questions

1) PLEASE EXPLAIN WHICH INSTITUTIONS YOU THINK SHOULD BE CONSIDERED BY THE FEASIBILITY STUDY.

A revision of the reporting system can only be beneficial if all reports are taken into account. This relates to statistical reporting, regulatory reporting and reporting to resolution authorities and deposit guarantee institutions (the latter two are not relevant for many EAPB members). In the end only in this way simplifications and reductions in cost can be achieved. Therefore, all relevant stakeholders must be taken into account in a feasibility study, i.e. both the reporting authorities and the reporting institutions.

2) PLEASE EXPLAIN WHICH DATA COLLECTIONS YOU THINK SHOULD BE CONSIDERED BY THE FEASIBILITY STUDY.

3) DO YOU CONSIDER THAT THE ISSUES IDENTIFIED, THE OPTIONS PROPOSED AND THE ASSESSMENT APPROACH TAKEN THROUGHOUT THE DISCUSSION PAPER ARE RELEVANT AND COMPLETE? IF NOT, PLEASE EXPLAIN.

4) WHAT DO YOU PERCEIVE AS THE KEY OBSTACLES AND OPERATIONAL CHALLENGES TO DEVELOP AN INTEGRATED REPORTING FRAMEWORK (FOR YOUR INSTITUTION)?

	NOT RELEVANT	SOMEWHAT RELEVANT	RELEVANT	HIGHLY RELEVANT
Training / additional staff (skills)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
IT changes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Changes in processes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Changes needed in the context of other counterparties / third-party providers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Time required to find new solutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

PLEASE SPECIFY "OTHER" FROM QUESTION 4

Section 2. Stocktake

5) DO YOU CONFIRM THE FINDINGS PRESENTED IN THE STOCKTAKE? IF YOU HAVE ADDITIONAL INFORMATION, PLEASE PROVIDE MORE SPECIFIC DETAILS ABOUT THE AMOUNT OF DATA COLLECTED.

Section 3. Reporting process

6) DO YOU AGREE ON THE HOLISTIC APPROACH USED AND THE ASSESSMENT DONE FOR THE INTEGRATION ASSESSMENT (DIFFERENT STEPS OF THE REPORTING PROCESS CHAIN AND DIFFERENT LEVELS OF INTEGRATION)?

	HIGHLY AGREE	AGREE	SOMEWHAT AGREE	DON'T AGREE
Data Dictionary - Semantic level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data Dictionary - Syntactic level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data Dictionary - Infrastructure level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data collection - Semantic level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data collection - Syntactic level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data collection - Infrastructure level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data transformation - Semantic level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data transformation - Syntactic level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data transformation - Infrastructure level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data exploration - Semantic level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data exploration - Syntactic level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data exploration - Infrastructure level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

PLEASE INSERT HEREAFTER ANY COMMENTS YOU MIGHT HAVE IN RELATION TO QUESTION 6

WHAT SOLUTIONS SHOULD THE EBA INVESTIGATE IN THE AREAS LISTED IN QUESTION 6 THAT COULD HELP TO REDUCE REPORTING COSTS?

7) PLEASE SPECIFY ANY FURTHER COSTS[1] OR BENEFITS YOU ENVISAGE RELATED TO THE DIFFERENT STAGES OF THE REPORTING PROCESS CHAIN:

[1] 'Costs' refer to qualitative aspects as described in the relevant sectors throughout the report.

Reporting process stages	Comments on the costs and benefits already identified	Additional costs identified	Additional benefits identified
Data definition			
Data collection			
Data transformation			
Data exploration			

DATA DEFINITION - COMMENTS ON THE COSTS AND BENEFITS ALREADY IDENTIFIED

DATA DEFINITION - ADDITIONAL COSTS IDENTIFIED

DATA DEFINITION - ADDITIONAL BENEFITS IDENTIFIED

DATA COLLECTION - COMMENTS ON THE COSTS AND BENEFITS ALREADY IDENTIFIED

DATA COLLECTION - ADDITIONAL COSTS IDENTIFIED

DATA COLLECTION - ADDITIONAL BENEFITS IDENTIFIED

DATA TRANSFORMATION - COMMENTS ON THE COSTS AND BENEFITS ALREADY IDENTIFIED

DATA TRANSFORMATION - ADDITIONAL COSTS IDENTIFIED

DATA TRANSFORMATION - ADDITIONAL BENEFITS IDENTIFIED

DATA EXPLORATION - COMMENTS ON THE COSTS AND BENEFITS ALREADY IDENTIFIED

DATA EXPLORATION - ADDITIONAL COSTS IDENTIFIED

DATA EXPLORATION - ADDITIONAL BENEFITS IDENTIFIED

Section 4. Data dictionary

8) DO YOU USE ONE OR MORE DATA DICTIONARIES IN YOUR COMPLIANCE AND REPORTING PROCESSES?

9) WHAT ARE THE CHARACTERISTICS YOU THINK A DATA DICTIONARY SHOULD HAVE? DO YOU AGREE WITH THE ONE REFERRED TO IN THIS DOCUMENT? DO YOU THINK ANY CHARACTERISTIC IS MISSING OR SHOULD NOT BE INCLUDED?

A robust and well-defined data model for all reporting areas is the key to a future-oriented new reporting format. Approaches that are already well advanced in development, such as BIRD, should definitely be included in the development. The data dictionary should be structured in such a way that a transaction with all its components only needs to be reported once in order to fulfill all reporting requirements.

10) WHAT IS THE ROLE YOU THINK THE DATA DICTIONARY CAN HAVE IN REGULATORY COMPLIANCE AND REPORTING?

11) HOW MUCH WOULD A STANDARD DATA DICTIONARY HELP INSTITUTIONS TO IMPROVE THE PROCESSES OF:

	SIGNIFICANTLY	MODERATELY	LOW
Understanding reporting regulation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Extracting data from internal system	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Processing data (including data reconciliation before reporting)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exchanging data and monitoring regulators' feedback	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exploring regulatory data	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Preparing regulatory disclosure compliance.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

SIGNIFICANTLY MODERATELY LOW

Other processes of institutions



PLEASE EXPLAIN HOW WOULD A STANDARD DATA DICTIONARY HELP INSTITUTIONS TO IMPROVE THE LISTED PROCESSES.

12) HOW IMPORTANT IS IT FOR INSTITUTIONS TO HAVE A UNIQUE AND STANDARD DATA DICTIONARY FOR ALL REGULATORY DATA WITH THE AIM OF ENSURING CONSISTENT USE ACROSS THE SUPERVISORY, RESOLUTION AND STATISTICAL REPORTING?

- Highly important
- Important
- Somewhat important
- Not important
- Other

PLEASE SPECIFY "OTHER" FROM QUESTION 12 AND INCLUDE HERE ANY ADDITIONAL COMMENT

13) HOW MUCH WOULD IT COST TO MOVE TO A UNIQUE REGULATORY DATA DICTIONARY?

- Highly costly
- Moderately costly
- Not very costly
- Not applicable

PLEASE INCLUDE ANY OTHER COMMENT TO QUESTION 13

14) HOW MUCH COST REDUCTION IS EXPECTED BY INTEGRATING THE NATIONAL REGULATORY REPORTING TOGETHER WITH THE HARMONISED REPORTING REGULATION INTO A UNIQUE DATA DICTIONARY?

- High cost reductions

- Moderate cost reductions
- Small cost reductions
- No cost reductions

PLEASE INCLUDE ANY OTHER COMMENT TO QUESTION 14

15) HOW MUCH COST REDUCTION IS EXPECTED BY INTEGRATING AD HOC REGULATORY REPORTING WITH HARMONISED REGULATION INTO A UNIQUE DATA DICTIONARY?

- High cost reductions
- Moderate cost reductions
- Small cost reductions
- No cost reductions

PLEASE INCLUDE ANY OTHER COMMENT TO QUESTION 15

16) DO YOU AGREE WITH THE COSTS AND BENEFITS HIGHLIGHTED IN THE CHAPTER? DO YOU SEE OTHER COSTS AND BENEFITS WHEN IMPLEMENTING A STANDARD DATA DICTIONARY?

Section 4.6 Data granularity

17) WHAT WOULD BE THE IMPLICATION OF GRANULAR DATA REPORTING ON THE INSTITUTIONS' COMPLIANCE WITH BCBS 239 (ALSO IN THE CONTEXT OF THE OPTIONS PRESENTED)?

18) FOR WHICH REPORTING AREAS (PRUDENTIAL, STATISTICAL AND RESOLUTION OR MODULES/PARTS OF THESE AREAS) MAY THE USE OF GRANULAR DATA PRESENT A SOLUTION? (MULTIPLE CHOICES)

- statistical

- resolution
- prudential

PLEASE INCLUDE ANY OTHER COMMENT TO QUESTION 18

19) WHICH OF THE OPTIONS REGARDING THE GRANULARITY OF THE POSSIBLE FUTURE INTEGRATED REPORTING DO YOU THINK IS FEASIBLE (GIVEN THE CHALLENGES AND CONSTRAINTS HIGHLIGHTED IN THE DISCUSSION PAPER AND POSSIBLY OTHERS) AND PREFERABLE FOR YOU? WHAT ARE THE MAIN CHALLENGES AND POSSIBLE SOLUTIONS TO CONSIDER? PLEASE RANK POTENTIAL CHALLENGES IN ASCENDING ORDER (I.E. STARTING WITH THE MOST CHALLENGING ITEM IN YOUR VIEW).

FEASIBLE AND PREFERABLE

- option 1
- option 2
- option 3
- other

PLEASE SPECIFY "OTHER" FROM QUESTION 19

MAIN CHALLENGES AND POSSIBLE SOLUTIONS - OPTION 1

MAIN CHALLENGES AND POSSIBLE SOLUTIONS - OPTION 2

MAIN CHALLENGES AND POSSIBLE SOLUTIONS - OPTION 3

MAIN CHALLENGES AND POSSIBLE SOLUTIONS - OTHER**20) IN CASE OF OPTION 2, PLEASE SPECIFY HOW SHOULD THE GRANULAR COLLECTION LAYER BE DESIGNED TO YOUR BEST ADVANTAGE (AND BENEFIT OF REPORTING MORE GRANULARLY)?**

Regarding the granularity of the data to be reported, reporting at the individual transaction level must be intended. If aggregations and evaluations are carried out at the reporting recipients on the reported data, the rules used for this must be transparent and traceable for the reporting institution. Furthermore, it should be possible for the reporting party to get access to these results. In the end, only the reporting institution can be responsible for e.g. calculated capital ratios. Due to this initial situation, only option 2 (page 78 of the Discussion Paper) can be the preferred way of implementation, with the reduction of the volume of data to be reported being a key objective.

21) WHAT ARE THE MAIN BENEFITS AND COSTS OF IMPLEMENTING THE OPTION CONSIDERED FEASIBLE AND PREFERABLE BY YOU FROM QUESTION 19[1]?

[1] The options as defined in the discussion paper take as given that a standard, common data dictionary would be implemented. Benefits and costs should then be analysed from the point of view of the granularity of this data dictionary

COSTS

	HIGHLY (1)	MEDIUM (2)	LOW (3)	NO COSTS (4)
Collection/compilation of the granular data	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Additional aggregate calculations due to feedback loops and anchor values	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Costs of setting up a common set of transformations*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Costs of executing the common set of transformations**	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Costs of maintaining a common set of transformations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
IT resources	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	HIGHLY (1)	MEDIUM (2)	LOW (3)	NO COSTS (4)
Human resources	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complexity of the regulatory reporting requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data duplication	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other: please specify	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**E.g., participate with resources at setting up, testing and maintaining the transformations (please consider this in opposition to the current costs for the maintenance of unharmonised transformation rules). **Please consider this in opposition to the current costs for executing internally unharmonised transformations.*

PLEASE SPECIFY "OTHER" FROM QUESTION 21 - COSTS

BENEFITS

	HIGHLY (1)	MEDIUM (2)	LOW (3)	NO BENEFITS (4)
Reducing the number of resubmissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Less additional national reporting requests	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further cross-country harmonisation and standardisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Level playing field in the application of the requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplification of the internal reporting process	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduce data duplications	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complexity of the reporting requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other: please specify	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

PLEASE SPECIFY "OTHER" FROM QUESTION 21 - BENEFITS

22) WHAT POSSIBLE ASPECTS RELATED TO THE DESIGN OF THE OPTION (QUESTION 19) WOULD MAKE THE COSTS FOR THIS OPTION HIGHER THAN THE BENEFITS AND THEREFORE NOT WORTH IMPLEMENTING?

23) IF TRANSFORMATIONS ARE TO BE DEFINED (AS DEPICTED IN OPTION 2 OR OPTION 3), WHO SHOULD BE RESPONSIBLE FOR THEIR DEFINITION (E.G. WHO TAKES RESPONSIBILITY FOR THEIR CORRECTNESS) AND THEIR EXECUTION?

- The authorities
- Reporting institutions
- Authorities and reporting institutions jointly
- Transformations would not be binding but the result of a cooperative effort and no responsibility attribution would be required.

25) HOW SHOULD THE TRANSFORMATIONS BE IN TERMS OF FORMALISATION AND READINESS FOR DIGITAL PROCESSES?

- Harmonised and standardised, ready to be implemented by digital processes (fixed)
- Indicative instructions of calculation explaining the possible approaches (allowing for adaptations)

24) IF TRANSFORMATIONS ARE DEFINED UNDER DIFFERENT SCENARIOS WITH RESPECT TO RESPONSIBILITIES, WHAT ARE THE MAJOR IMPLICATIONS TO THE POSSIBILITY OF DEFINING A MORE GRANULAR COLLECTION LAYER FROM A COST AND BENEFIT PERSPECTIVE ALSO CONSIDERING SOME OF THE CHALLENGES DEPICTED IN THE PAPER (TECHNICAL AND LEGAL, E.G. INSTITUTIONS NEED TO REMAIN RESPONSIBLE FOR ALL THE DATA).

Responsibility for defining transformations	Costs	Benefits	Challenges	Design options/solutions
Authorities				
Reporting institutions				
Jointly authorities and reporting institutions				
Transformations are not binding				

PLEASE INCLUDE ANY COMMENT TO QUESTION 24

26) HOW COULD SOME OF THE CHALLENGES HIGHLIGHTED FOR DEFINING TRANSFORMATIONS BE OVERCOME?

MANUAL ADJUSTMENTS

Definition of appropriate rules.

CONSOLIDATED/INDIVIDUAL FIGURES

Data collection on prudential, statistical and resolution legislation should be aligned; supervisory scope should change.

DIFFERENT VALUATIONS

Valuation methods, for example, fair value, amortized costs etc. should be harmonized; unique valuation method.

PRINCIPLE-BASED RULES

Rules across the entire EU should be harmonized.

LEGAL ASPECTS

Alignment across the entire EU, like legislation on confidentiality and data privacy, etc.

Legal aspects should be treated at national level and taken into account at European level definitions.

OTHER

27) WHAT KIND OF DATA SHOULD BE PART OF THE FEEDBACK LOOPS?**28) WHAT OTHER AREAS SHOULD THE FEASIBILITY STUDY INVESTIGATE IN TERMS OF GRANULARITY AND TRANSFORMATION RULES?**

Section 5. Central data collection point

29) IS YOUR INSTITUTION REPORTING TO DIFFERENT AUTHORITIES IN YOUR HOME COUNTRY?

- Yes
- No
- Not applicable

30) IS YOUR INSTITUTION REPORTING TO OTHER AUTHORITIES IN HOST COUNTRIES?

- Yes
- No
- Not applicable

PLEASE COMMENT: WHAT PROBLEMS ARISE FROM REPORTING TO DIFFERENT AUTHORITIES?

The majority of the institutions report to different authorities in their countries.

Problems that arise from reporting to different authorities:

- Differences in: (data) delivery models, accounting rules, definitions, consolidation aspects, technical formats, reporting timelines and frequencies;
- Overlapping data requests;
- Local differences in terms of regulation;
- Mix of aggregated and granular data;

31) ARE YOU USING ONE OR MORE DATA DICTIONARIES FOR REPORTING? HOW?

- One single dictionary
- Multiple dictionaries

PLEASE COMMENT: HOW ARE YOU MAKING USE OF THEM?

Because of differences in primary reporting definition as well as in the technical input layer across EU countries, institutions are consequently using a different semantic and syntactic data definition and a different semantic and syntactic definition for the data collection.

In other cases, dictionaries differ country by country or by reporting framework. Some are using an internal data dictionary, while some other banks are using one conceptual data dictionary with more technical implementations. That's why, each system has its own implementation.

32) ARE YOU USING THE SAME OR DIFFERENT FORMATS FOR PRUDENTIAL/RESOLUTION REPORTING AND FOR STATISTICAL REPORTING?

- The same format
- Different formats

PLEASE INCLUDE ANY OTHER COMMENT TO QUESTION 32**33) HOW IMPORTANT WOULD IT BE, FOR YOUR INSTITUTION, TO HAVE ACCESS TO A CDCP FOR ALL PRUDENTIAL, RESOLUTION AND STATISTICAL REPORTS? WHY?**

- Very important
- Important
- Somehow important
- Not important

PLEASE INCLUDE ANY OTHER COMMENT TO QUESTION 33**34) WHAT SHOULD BE, IN YOUR VIEW, THE MAIN CHARACTERISTICS OF A CDCP?**

- One dictionary for all data collections, without any regard to the final purpose, who the requesting authority is, and what the national vs EU nature of the request is.
- Only one collection layer, no existence of multiple reporting layers.
- Proper governance should be established, in order to reuse and share already existing data.
- Standardized transformation rules deriving regulatory data/templates.
- In order to protect sensible data from EU and other countries, encryption facilities should be available.
- For all types of reports and in all jurisdictions, the interfaces for data collection should be consistent.
- Uniform protocols and formats should be used for data exchange between the institutions and the authorities.
- Common roles and access control rules.
- Data quality should be assured through quality controls and control framework.
- Clearly defined Data Dictionary covering the data definitions; principles and rules of data quality management;
- Complex data transformation should be avoided.

35) WHAT WOULD YOU THINK COULD BE THE CHALLENGES, COSTS AND BENEFITS OF CHANGING TO A CDCP?

System design	Costs	Benefits	Challenges
[...]			

PLEASE ANSWER HERE TO QUESTION 35

36) WHAT SOLUTIONS COULD THE EBA INVESTIGATE THAT WOULD REDUCE COSTS?

Aspect	Proposed solutions for the EBA to investigate to reduce costs
Architectures	

PLEASE ANSWER HERE TO QUESTION 36

Following aspects should be taken into account to reduce the costs:

- A commonly used single granular data model in the European banking industry is essential to reduce the costs of reporting.

- To the reporting institutions both the proposed "centralized system" (5.2.10) and "distributed system" (5.2.11) are beneficial in a same manner, but we consider that the centralized system would produce a lower TCO. Furthermore, if the "distributed system" allows for national divergence of data requirements, this alternative will be significantly worse than the centralized system for the reporting institutions.

Section 6. Private-public collaboration/cost-sharing

37) WOULD THE INDUSTRY BE PREPARED TO BEAR THE COSTS OF INTEGRATED REPORTING?

- Yes, to a large extent
- Yes, to a limited extent
- No

PLEASE INCLUDE ANY OTHER COMMENT TO QUESTION 37

38) WHERE (WITHIN THE DIFFERENT ELEMENTS DISCUSSED IN THE PAPER) DO INSTITUTIONS AND CAS SEE INSTITUTIONS' INVOLVEMENT AND COST CONTRIBUTION AS MOST VALUABLE IN THE DEVELOPMENT OF AN INTEGRATED REPORTING FRAMEWORK?

	NOT VALUABLE AT ALL	VALUABLE TO A DEGREE	VALUABLE	HIGHLY VALUABLE
Data definition – Involvement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data definition – Cost contribution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data collection – Involvement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data collection – Cost contribution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data transformation – Involvement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data transformation – Cost contribution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data exploration – Involvement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	NOT VALUABLE AT ALL	VALUABLE TO A DEGREE	VALUABLE	HIGHLY VALUABLE
Data exploration – Cost contribution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data dictionary – Involvement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data dictionary – Cost contribution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Granularity – Involvement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Granularity – Cost contribution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Architectures – Involvement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Architectures – Cost contribution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Governance – Involvement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Governance – Cost contribution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other – Involvement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other – Cost contribution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

PLEASE INSERT ADDITIONAL INFORMATION FOR "OTHER"

PLEASE INCLUDE ANY OTHER COMMENT TO QUESTION 38

39) ON A BEST EFFORT BASIS, PLEASE INCLUDE ANY MONETARY COST ESTIMATE YOU MAY BE ABLE TO PROVIDE (% OF OPERATIONAL COSTS) RELATED TO THE IMPLEMENTATION OF AN INTEGRATED REPORTING SYSTEM FOR YOUR INSTITUTION.

The estimation of costs is bank-specific and requires a detailed analysis. Moreover, it depends on the scenario (full integration to optimizing current DPM), the granularity of reporting frameworks and transformation aspects. Because of these unknowns we are not able to provide a figure.

Section 7. Push vs Pull approach

40) WOULD YOU PREFER THE FUTURE INTEGRATED REPORTING SYSTEM TO BE BASED ON:

- A pull approach
- A push approach
- A mixed (pull and push) approach
- Other

PLEASE INCLUDE ANY OTHER COMMENT TO QUESTION 40

With regard to the organization of future reports, an institute should only have to deliver a report to one central office and only clarify any data quality problems that arise with this office (single point of contact). Since the responsibility for the correctness of the data lies with the supplying institute, the push model seems to be the only possible solution in terms of architecture.

41) WHAT WOULD BE THE MAIN ADVANTAGES AND DISADVANTAGES TO CONSIDER OR/AND WHAT WOULD BE THE MAIN CHALLENGES TO CONSIDER AND WHAT WOULD BE THE POSSIBLE DESIGN OPTIONS (FROM BOTH A TECHNICAL AND PROCESS PERSPECTIVE)?

Approach	Costs	Benefits	Challenges	Design options/solutions
Pull				
Push				
Mixed				

PULL

PUSH

MIXED

Section 8. Governance

42) COULD YOU PLEASE SPECIFY ANY LEGAL OBSTACLES, CHALLENGES AND POSSIBLE SOLUTIONS YOU WOULD SEE RELATED TO THE FOLLOWING?

FEASIBILITY OF THE CENTRAL DATA COLLECTION POINT

COLLECTION AND ACCESS TO GRANULAR DATA BY AUTHORITIES

THE RESPONSIBILITY OF THE REPORTING INSTITUTIONS FOR THE REPORTED DATA, IF THE TRANSFORMATION OF GRANULAR DATA IS CONDUCTED BY AUTHORITIES (I.E. NOT THE REPORTING INSTITUTION)

OTHER, PLEASE SPECIFY

43) DO YOU AGREE WITH THE SUGGESTED COORDINATION MECHANISM FOR DATA REQUESTS? DO YOU SEE ANY BENEFITS OR DISADVANTAGES IN THIS APPROACH?

44) PLEASE SPECIFY HOW THE AGILE COORDINATION MECHANISM FOR COORDINATION OF DATA REQUESTS COULD BE FURTHER SIMPLIFIED AND HOW YOUR PROPOSED MEASURES COULD ENHANCE COORDINATION AND AVOID DATA DUPLICATION?

We agree with the EBA-description of the 'Agile Coordination Mechanism', because it represents a simple and efficient way to manage a better governance of new data requests and to make use of the capabilities of the CDCP and the common data dictionary. For example, since the objective of the data request can differ, it could start with defining the data definitions per competent authority. Once this is done, it could detect and eliminate overlaps. A unified code for each data definition will support this (and will ease machine readability). In case an authority wants to add a new definition, it should clearly state why this definition from its point of view is missing in the central dictionary. Then a board of supervisors for prudential and statistical reporting should judge the new requests and, if approved, should ensure that the data element is added to the central framework.

45) ACCORDING TO THE REPORTING CLASSIFICATION PROPOSAL INCLUDED IN ANNEX I: ARE THERE FURTHER REPORTING CRITERIA TO BE TAKEN INTO ACCOUNT UNDER CATEGORY 3 REPORTING?

46) ACCORDING TO THE REPORTING CLASSIFICATION PROPOSAL INCLUDED IN ANNEX I: DO YOU AGREE WITH THE PROPOSED APPROACH FOR NON-RECURRING TYPE OF DATA CATEGORY 4?

47) WHAT SOLUTIONS COULD THE EBA INVESTIGATE THAT WOULD REDUCE COSTS?

Aspect	Proposed solutions for the EBA to investigate to reduce costs
Governance	

PLEASE INSERT YOUR ANSWER TO Q 47 HERE

We consider that this matter should be discussed in the further course.

Section 9. Technology

48) ARE YOU MAKING USE OF REGTECH FOR REPORTING PURPOSES? IF YES, PLEASE TICK FOR WHICH REPORTING PROCESS STEP:

- Data definition
- Data collection
- Data transformation
- Data exploration

IF NO, PLEASE EXPLAIN:

- Not fully developed or useful for my needs
- Other (please explain)

PLEASE EXPLAIN "OTHER" FROM THE ABOVE QUESTION

The use of RegTech by the institutions differs. Some of them do not use it at all. Others use it partially, for example, to support data collection and transformation. There are also institutions using it widely, in each step of the reporting process.

49) WHICH OF THE REPORTING PROCESS STEPS WOULD BENEFIT MORE FROM REGTECH DEVELOPMENT?

- Data definition
- Data collection
- Data transformation
- Data exploration

PLEASE INCLUDE ANY OTHER COMMENT TO QUESTION 49

The advantages of using RegTechs can only be assessed on an institution-specific basis. The larger and more complex or specialized an institution's business, the lower the marginal benefit of using a RegTech.

50) DO YOU AGREE WITH THE MAIN OBSTACLES HIGHLIGHTED IN THE DISCUSSION PAPER? DO YOU SEE ANY FURTHER CHALLENGES?

51) WOULD YOU BE KEEN TO INVEST IN REGTECH FOR INTEGRATION OF DIFFERENT TYPES OF DATA? HOW WOULD YOU DEVELOP SUCH A TECHNOLOGY?

- in-house
- via a service provider

PLEASE INCLUDE ANY OTHER COMMENT TO QUESTION 51**52) HOW DO YOU THINK REGTECH CAN HELP IN DATA INTEGRATION?****53) DO YOU AGREE THAT DATA STANDARDISATION IS THE FIRST NECESSARY STEP FOR USING REGTECH?**

- Yes
- No

PLEASE INCLUDE ANY OTHER COMMENT TO QUESTION 53**DISCLOSE COMMENTS ***

- yes
- no

NAME OF THE ORGANIZATION *

European Association of Public Banks (EAPB)

EMAIL *

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