Feedback to consultation paper

Document Title	T2S Consultation Paper: Principles and High Level Proposals
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Proposal Nr.	Statement	Comment	Institution	Confidential
1	I agree		Swiss User Group	No
2	I do not agree entirely	We see no good reason for splitting liquidity between cash and RTGS accounts. Would it not be easier to use directly the RTGS account? How will the cash management be funded during the night? > Overall more clarification is needed! Is it only a technical issue?	Swiss User Group	No
3	I agree		Swiss User Group	No
4	I agree		Swiss User Group	No
5	I agree		Swiss User Group	No
6	I agree		Swiss User Group	No
7	I agree	But some clarity in terms of reasoning and/or definition is necessary	Swiss User Group	No
8	I agree	But it has to be possible, that a participant covering several of those roles still operates only one main account and is not forced to operate one account per role.	Swiss User Group	No
9	I agree		Swiss User Group	No
10	I agree		Swiss User Group	No
11	I agree		Swiss User Group	No
12	I agree		Swiss User Group	No
13	I agree		Swiss User Group	No
14	I agree		Swiss User Group	No
15	I agree		Swiss User Group	No
16	I agree		Swiss User Group	No
17	I agree		Swiss User Group	No
18	I agree		Swiss User Group	No
19	I agree		Swiss User Group	No
20	I agree	Under the condition that night time settlement is not optional (proposal 23). Furthermore T2 should be available with all ist functionality also at night; the currently foreseen night-time availability of T2 is not sufficient for DVP settlement in a globalised world. Field of action has impact on Giovanni Barriers 4 & 7.	Swiss User Group	No
21	I agree		Swiss User Group	No
22	I agree		Swiss User Group	No

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23	I completely disagree	Night time settlement should not be optional. For the sake of efficiency and faster turnover across borders all CSD's should participate in night-time settlements. Therefore we suggest that all markets should start DVP settlements right after midnight.	Swiss User Group	No
24	I agree		Swiss User Group	No
25	I agree		Swiss User Group	No
26	I agree		Swiss User Group	No
27	I agree		Swiss User Group	No
28	I agree		Swiss User Group	No
29	I agree		Swiss User Group	No
30	I do not agree entirely	It might be cruical to properly define the interface between CSD's and T2S in terms of efficiency when e.g. CSD's match trades only to domestic participants. In order to facilitate matters and increase STP matching should take place on T2S level only. Matched TRX form Stock Exchanges can enter directly as locked in trades into T2S. Bilateral matchings of all OTC transactions need to match in T2S. CSD's should not perform any matchings. Uniform matching rules must apply.	Swiss User Group	No
31	I agree		Swiss User Group	No
32	I agree		Swiss User Group	No
33	I do not agree entirely	However "hold and release mechanism" for settlement needs to be possible for matched instructions; e.g. it must be possible to delay the settlement of matched instructions through a hold (freeze) mechanism if necessary (ECSDA Standard).	Swiss User Group	No
34	I agree		Swiss User Group	No
35	I do not agree entirely	An instruction presented for matching has in our opinion to be complete and should basicly not be amended afterwards anymore. Only the following information can be changed: Settlement priority, Hold/Release information, narrative fields. Any matching relevant fields are not allowed to change, the same applies to information reg. the investor (KYC rule, anti money laundering, etc.) Uniform matching standards are a prerequisite.	Swiss User Group	No
36	I agree		Swiss User Group	No
37	I agree		Swiss User Group	No
38	I agree	A very ambitious goal with regard to complexity of sequencing of instructions in the settlement engine!	Swiss User Group	No
39	I agree		Swiss User Group	No
40	I agree		Swiss User Group	No
41	I agree		Swiss User Group	No
42	I agree		Swiss User Group	No
43	I agree		Swiss User Group	No

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44	I agree		Swiss User Group	No
45	I agree		Swiss User Group	No
46	I agree	But Recycling should be triggered by a change in position.	Swiss User Group	No
47	I do not agree entirely	Partial settlement should only be allowed, if both parties involved agree on it individually by transaction. Furthermore the process should follow a cancellation of the originally given instructions followed by new instructions on the partial shapes. Shaping is common in the CCP environment and the assumption is that it will also be valid for OTC. Therefore we suggest: Shaping OK for Exchange and OTC Trx when one party is a CCP. Shaping NOK for all other OTC transactions incl. account transfers against payment.	Swiss User Group	No
48	I agree		Swiss User Group	No
49	I agree		Swiss User Group	No
50	I agree		Swiss User Group	No
51	I agree		Swiss User Group	No
52	I do not agree entirely	Cost and return of direct access to be questioned from a CSD perspective, especially in case the CSD operates efficient.	Swiss User Group	No
53	I agree		Swiss User Group	No
54	I agree		Swiss User Group	No
55	I do not agree entirely	See comment under proposal 52	Swiss User Group	No
56	I agree		Swiss User Group	No
57	I agree		Swiss User Group	No
58	I agree		Swiss User Group	No
59	I agree		Swiss User Group	No
60	I do not agree entirely	No statement possible, as daily volumes of all markets are not commonly known; accuracy of volume projection?	Swiss User Group	No
61	I agree		Swiss User Group	No
62	I agree		Swiss User Group	No
63	I agree		Swiss User Group	No
64	I agree		Swiss User Group	No
65	I agree		Swiss User Group	No
66	I agree		Swiss User Group	No
67	I do not agree entirely	Harmonised standards must be best practice; markets with best practice must not be forced to pay money for downgrading their services! Solutions for unharmonised local processes need to be avoided by all means. In cases harmonisation can not be reached, the costs should be born by the failing party.	Swiss User Group	No