

Template for comments

Public consultation on the draft amending ECB Regulation on MFI balance sheet statistics

Institution/Company

Dell Financial Services

Contact person

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First name

Surname

Email address

Telephone number

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General comments

The amendments appear to be relatively immaterial particularly from an LSI perspective, however the set-up of the new templates is not an insignificant undertaking and has to be done even if the changes were completely irrelevant to an institution

Is there a proportionality consideration for this proposed amendment

With the future change to granular reporting (IReF) – would it be better to capture these amendments then with any required additional data reported separately (leaving the existing templates as they are)

This would be beneficial for most banks where the data requests do not affect them, as it would mean the set-up costs of changing their existing processes is eliminated