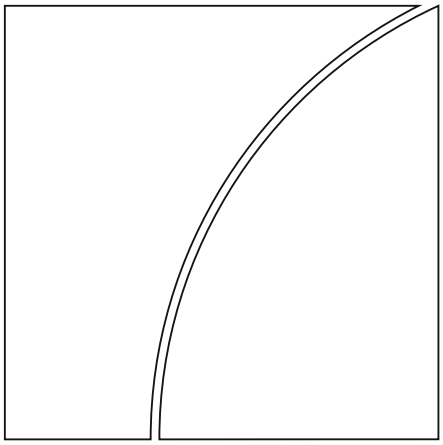
Basel Committee
on Banking Supervision



Frequently asked questions on Basel III monitoring

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Frequently asked questions on Basel III monitoring

1. Introduction

This document provides answers to technical and interpretive questions raised by supervisors and banks during the Committee's Basel III monitoring. **The document intends to facilitate the completion of the monitoring questionnaire and is not to be construed as an official interpretation of other documents published by the Committee.**

Paragraph numbers given in the remainder of this document usually refer to *Basel III: A global regulatory framework for more resilient banks and banking systems* ("the Basel III standards"), the *Basel III leverage ratio framework and disclosure requirements* ("the Basel III leverage ratio framework"), *Basel III: The Liquidity Coverage Ratio and liquidity risk monitoring tools* ("the Basel III LCR standards") and *Basel III: The Net Stable Funding Ratio – Consultative Document* ("Basel III NSFR standards").[1]

In addition to the guidance for completing the monitoring template contained in this document, the Committee has published frequently asked questions as its official response to questions of interpretation relating to certain aspects of the Basel III standards. **Therefore, banks should also take into account the frequently asked questions on capital and counterparty credit risk published by the Committee.[2]**

Questions which have been added since the previous version of the FAQs are shaded yellow; questions which have been revised (other than updated cell references) are shaded red.

2. General

1. In columns F and G of panel A1 of the "Requirements" worksheet, should the RWA amounts be the incremental effect of Basel 2.5 and Basel III compared to the current framework?

   Answer: No. Banks should report the total RWA amount under Basel 2.5 and Basel III.

2. How should "exposure amount" be defined in row 63 of the "Requirements" worksheet? Banks tend to follow their own practices / assumptions to report the exposure amount for different products on different bases (eg notional value, PV01 etc).

   Answer: Banks should fill in the exposure amount as per their regular reporting on market risk exposures based on Basel 2.5 standards.

[1] Basel Committee on Banking Supervision, *Basel III: A global regulatory framework for more resilient banks and banking systems (revised June 2011)*, June 2011, www.bis.org/publ/bcbs189.htm; Basel Committee on Banking Supervision, *Basel III leverage ratio framework and disclosure requirements*, January 2014, www.bis.org/publ/bcbs270.htm; Basel Committee on Banking Supervision, *Basel III: The Liquidity Coverage Ratio and liquidity risk monitoring tools, January 2013,* www.bis.org/publ/bcbs238.htm; Basel Committee on Banking Supervision, *Basel III: The Net Stable Funding Ratio – Consultative Document,* January 2014, www.bis.org/publ/bcbs271.htm.

[2] Basel Committee on Banking Supervision, *Basel III definition of capital – Frequently asked questions*, December 2011, www.bis.org/publ/bcbs211.htm; Basel Committee on Banking Supervision, *Basel III counterparty credit risk – Frequently asked questions*, December 2012, www.bis.org/publ/bcbs237.htm.

3. Definition of capital

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4. Leverage ratio

1. Items deducted from the capital measure that must symmetrically be deducted from the Basel III leverage ratio exposure measure are only those that are on the asset side of the balance sheet. There should not be any liability item deducted from the Basel III leverage ratio exposure measure.

   Answer: Yes.

2. How should the Basel III leverage ratio exposure be measured? Shall the accounting treatment be used?

   Answer: The Basel III leverage ratio exposure measure for the leverage ratio should generally follow the accounting value, coupled with the following adjustments for non-derivative exposures and non-securities financing transactions (non-SFTs): (i) net of specific provisions and valuation adjustments; (ii) do not reduce on-balance sheet exposures for physical or financial collateral, guarantees or credit risk mitigation purchased; and (iii) no netting of loans and deposits. Moreover, for derivative exposures the effect of netting according to the Basel II framework should be considered, while for SFTs netting of cash receivables with cash payables may only be recognised subject to the strict criteria set out in paragraph 33(i) of the Basel III leverage ratio framework. Please also refer to the Basel III leverage ratio framework for more details on how to calculate the exposure measure.

3. It is not obvious whether the Basel III leverage ratio will be affected by insurance activities.

   Answer: See paragraphs 8, 9 and 16 of the Basel III leverage ratio framework.

4. Can the Committee confirm that cross-product netting is not permitted under the Basel III leverage ratio exposure measure, and that the 40/60 rule embodied within paragraph 96 (iv) of Annex 4 of the Basel II framework applies to the allowable netting of the CEM add-on?

   Answer: Yes.

5. Given that the restriction on counterparty credit risk due to hedging of financial institution investments has been removed in the definition of capital, does this also apply in the context of the Basel III leverage ratio even though in general it does not recognise credit risk mitigation?

   Answer: In the context of the Basel III leverage ratio, the capital measure follows the criteria laid down in the Basel III standards for the definition of capital. This applies also to the hedging of investments in the capital of banking, financial and insurance entities.

   In order to ensure that the capital and exposure measures are measured consistently, investments in the capital of banking, financial and insurance entities are excluded from the Basel III leverage ratio exposure measure for the same amount deducted from capital.

   In any case, it must be noted that physical or financial collateral, guarantees or credit risk mitigation purchased are not allowed to reduce the on-balance sheet exposures. This implies that no effects other than those described above should occur from the hedging of exposures that are included in the Basel III leverage ratio.

6. What is meant by credit risk mitigation? Any collateral pledged to us should be available, however, any hedges with counterparty risk will be hard to identify.

Answer: This requirement asks for delivery of gross positions for on-balance sheet exposures, ie guarantees, financial collateral or other risk mitigants are not allowed to reduce the on-balance sheet exposures. However, cash variation margin *received* associated with derivative transactions and fulfilling the criteria in paragraph 25 of the Basel III leverage ratio framework may be viewed as a form of pre-settlement and hence not considered as a credit risk mitigant for the purpose of the Basel III leverage ratio.

7. Should the "Off-balance sheet exposures: notional x regulatory CCF" area in panel C of the "Leverage Ratio" worksheet include the EAD amount resulting from the derivative transactions?

Answer: No, derivative transactions should only be included in columns D and J.

8. In cell D77 of the "Leverage Ratio" worksheet, should we only provide the amount resulting from the netting agreements or should we also include cash collaterals?

Answer: Cell D77 should include only the amount resulting from the netting, with the effects of collateral to be included in cell D79.

9. We assume row 12 also includes all other derivatives (ie all except credit derivatives). Is this correct?

Answer: Yes.

10. We seek confirmation that the standards do not allow the netting of loans and deposits?

Answer: This is correct.

11. Can banks subject to a national GAAP exclude fiduciary assets from the total exposures measure of the leverage ratio under any circumstance, and if so under what circumstances?

Answer: Yes. According to paragraph 15 and footnote 4 of the Basel III leverage ratio framework, where a national GAAP recognises on-balance sheet fiduciary assets, these assets can be excluded from the Basel III leverage ratio total exposures measure provided the assets meet the criteria in IAS 39 for de-recognition and, where applicable, IFRS 10 for de-consolidation. When disclosing the Basel III leverage ratio, banks should additionally disclose the extent of such de-recognised fiduciary items.

An example is the accounting for promotional programs for housing modernisation and energy conservation under German GAAP, where a state-owned bank provides loans via the bank in question acting as fiduciary (where the funding is completely provided by the state-owned bank, the administered funds cause neither credit risk nor liquidity risk for the bank in question, and the liability of the bank in question is limited to duly performing its obligations as a provider of funds management services). These loans are recognised on the balance sheet under German GAAP whereas they are not under IFRS.

12. Should the shortfall of the stock of provisions to expected losses (note paragraph 73 of Basel III) be deducted from the exposure measure of the Basel III leverage ratio?

Answer: See paragraph 16 of the Basel III leverage ratio framework.

13. A bank is applying national GAAP for their financial reporting, where certain derivative instruments are not recognised on the balance sheet. How should these derivatives be treated when calculating the exposure measure for the Basel III leverage ratio?

Answer: See paragraph 19 and footnote 6 of the Basel III leverage ratio framework.

5. Liquidity

5.1 General

1. It is cumbersome and time consuming to obtain data for rows 103 to 107 and 132 to 136 of the "LCR" worksheet ("additional deposit categories with higher run-off rates as specified by supervisor"). Since the weight is set to 0%, what is the significance of collecting these data? How should these amounts be reported on the "NSFR" worksheet?

   Answer: The parameters (ie the run-off rates applied for the purpose of calculating the LCR) for additional retail and small business deposit categories with higher run-off rates are specified by national supervisors, who are required to provide the specifications for these items. If a national supervisor has not yet decided what parameters to apply to these deposit categories, a 0% factor is automatically used for the calculation of the LCR.

   Amounts reported in lines 103 to 107 and 132 to 136 of the "LCR" worksheet should be reflected in the amount reported in cell C11 on the "NSFR" worksheet.

2. Section 2.2 of the instructions states: "Where information is not available, the corresponding cell should be left empty. No text such as "na" should be entered in these cells. However, leaving a cell empty could trigger exclusion from some or all of the analyses if the respective item is required."

   We would like to know which information is considered absolutely necessary to be reported so as not to be excluded from the most relevant analysis. At the moment, and given the short time to fill in the templates, we find it difficult to provide some of the breakdowns (eg operational deposits, distinction between non-transactional accounts with and without established relations and credit lines/ liquidity lines).

   Answer: All relevant breakdowns on the templates should be filled in on a "best- efforts" basis. Leaving a relevant row blank may distort the end result and may trigger exclusion from the analyses. Furthermore the LCR calculation may not produce a result in cell H443 (the LCR percentage) if any required cells are left blank. If cells are not applicable, then they are known to be zero and thus a zero value should be entered in such cells.

5.2 LCR

3. What is meant by "if the collateral received is re-used and tied up for 30 days or longer to cover short positions" in the treatment of reverse repos maturing within 30 days?

   Answer: The LCR framework assumes that a reverse repo can only roll off if the collateral received on the reverse repo is available or will become available within 30 days to be returned to the counterparty on the reverse repo.

   The bank may choose from the following options concerning the collateral received on reverse repos maturing within 30 days:

   (a) The bank could retain the collateral which would thereby be available for return when the reverse repo matures. In this case, the collateral may be included in the stock of high-quality liquid assets (if it satisfies the qualifying criteria) and repo transactions may roll-off in which case an inflow may be taken into account. The reverse repos should then be reported in lines 276 to 289.

   (b) The bank could sell the collateral to another party, in which case the bank would take a short position (it has sold assets it does not own outright). The collateral then cannot be included in the stock of high-quality liquid assets. In this case, per paragraph 147 of

the Basel III LCR standards, there is no need to report an outflow for the bank's short position, but the reverse repo cannot roll-off either, so there will not be an inflow of the cash extended in the reverse repo (ie it is assumed that the reverse repo will be rolled over to cover the bank's short position). The reverse repos should then be reported in lines 291 to 296.

(c) The bank could rehypothecate the collateral in a repo transaction. The collateral cannot then be included in the stock of high-quality liquid assets.

- If the repo transaction matures within 30 days, resulting in an outflow, the collateral may return within 30 days and the reverse repo could unroll resulting in an inflow (unless the collateral consists of Level 1 assets, in which case the reverse repo is assumed to roll-over in full). The reverse repos should then be reported in lines 276 to 289.
- If the repo transaction matures beyond the 30-day horizon, the collateral will not return within 30 days and the reverse repo is assumed to continue to roll-over in full and not generate any inflows. The reverse repos should then be reported in lines 291 to 296.

5.2.1 Stock of highly liquid assets

4. Section 6.1.1 of the instructions states "All assets ... should be under the control of the function charged with managing the liquidity of the bank". Can unencumbered high-quality trading assets qualify for the stock of liquid assets if internal procedures exist such that these trading assets would be put under the control of the liquidity risk management function in times of stress?

Answer: Assets qualifying for the stock of liquid assets should meet all of the operational requirements noted in paragraphs 31 to 40 of the Basel III LCR standards at all times (not just in times of stress) including:

(a) The stock should be under the control of the function charged with managing the liquidity of the bank (eg the treasurer), meaning the function has the continuous authority, and legal and operational capability, to monetise any asset in the stock (paragraph 33 of the Basel III LCR standards);

(b) Control must be evidenced either by maintaining assets in a separate pool managed by the function with the sole intent for use as a source of contingent funds, or by demonstrating that the function can monetise the asset at any point in the 30 day stressed period and that the proceeds of doing so are available to the function throughout the 30 day stressed period without directly conflicting with a stated business or risk management strategy (paragraph 33 of the Basel III LCR standards).

5. Can assets that otherwise qualify for the stock of high-quality liquid assets but that are used to hedge structural interest rate risk be included as eligible high-quality liquid assets in the buffer?

Answer: Yes, so long as the assets meet the other operational requirements (eg within the control of the treasury function, etc).

6. Can rated loans be included in the stock of liquid assets?

Answer: No, only securities can be included.

7. How should assets be distinguished among lines 57 and 60?

Answer: First report any assets qualifying for line 57 in that line. Then, report any assets not yet reported in line 57 that qualify for line 60. The important consideration is that assets should not be double-counted in this section.

8. How should unencumbered assets that are held in a pool at a major electronic collateral management system be treated?

Answer: Assets available to fund gaps between inflows and outflow from day 1 and that meet all the other operational requirements are eligible for the stock of high-quality liquid assets. To decide which assets in the pool should be considered encumbered and unencumbered, please refer to the "definition of unencumbered" provided in Section 6.1.1 of the instructions.

9. Do assets pledged with the central bank (eg for RTGS purposes) qualify as high-quality liquid assets?

Answer: The unused portion of the collateral that has been pre-positioned or deposited with, or pledged to, a central bank or a public sector entity (PSE) but that has not been used to generate liquidity can be counted as part of the stock of liquid assets in accordance with paragraph 31 of the Basel III LCR standards.

10. Assume a bank uses the GC pooling market as offered by Eurex in Germany and receives collateral consisting of a basket of fixed income securities where, for example, roughly 40% of these securities are highly rated government securities that would, on their own, qualify for the stock of liquid assets. The remaining part (60%) consists of securities (mainly covered bonds) issued by financials. The bank will receive this collateral as "full transfer of title" so these securities will initially be part of their liquid asset pool. How should this be treated in the LCR stock of high-quality liquid assets?

Answer: If the highly rated government securities cannot separately be sold or used in a repo transaction, the weight that should be applied in the LCR should correspond to the asset that receives the lowest weight within the framework. For example, if the basket of securities includes only government securities that would be Level 1 eligible and covered bonds that would be Level 2A eligible, the entire basket of securities would be considered as Level 2A assets. If any part of the basket of securities relates to assets that are ineligible for the stock of high-quality liquid assets, the entire basket should receive a 0% weight and thus be excluded from the stock.

11. Where the cap on Level 2 assets or the cap on Level 2B assets is binding for a bank (meaning that certain otherwise eligible assets are excluded from the stock of high-quality liquid assets), can the inflows on these excluded assets count in the denominator of the LCR as inflows (falling within the next 30 calendar days)?

Answer: No, Level 2A or Level 2B assets that are excluded from the stock of high-quality liquid assets because of the caps should remain reported in panel Ab (if Level 2A) or panel Ac (if Level 2B) and not be reported as inflows. However, assets that are excluded from the stock of high-quality liquid assets because they do not meet the operational requirements and are not reported in panel Ab (if Level 2A) or panel Ac (if Level 2B) can be included as inflows.

5.2.2 Cash outflows

12. Do "transactional accounts" in row 85 include "current accounts" from retail customers?

Answer: Yes, if the retail customers use these current accounts for regular transactions and they have, for instance, their salaries automatically deposited to these accounts.

13. Regarding a relationship account "where the customer has another relationship with the bank", does this include a situation where the customer has more than one product apart from a "non-transactional account" (eg more than just one savings account)?
Answer: Yes, the term "relationship" in this context refers to the customer having other products (ie loans, other deposit accounts) that makes it less likely that the customer will withdraw the deposits were the LCR stress scenario to unfold.

14. Row 60: The stock of high-quality liquid assets should not be designated to cover operational costs (such as rents and salaries): Does this effectively mean that 30-day expected operational costs are treated as an outflow?

Answer: No, the expected operational expenses are not included in outflows and the means held to pay them are not reflected in the stock of high-quality liquid assets.

15. Regarding "notes, bonds and other debt securities issued by the bank are included in this category regardless of the holder, unless the bond is sold exclusively in the retail market and held in retail accounts (including small business customers treated as retail)," can such bonds be treated as retail or small business customer deposits if they have been sold to a primary bank and from the primary bank then sold to retail customers or small business customers?

Answer: No, if such bonds are sold to a primary bank, they cannot exclusively be sold to retail and small business customers and would therefore not qualify for treatment as retail or small business customer deposits.

16. Given the short time frame provided to fill in the templates, the basic difficulty will be combining different databases (eg commercial and financial information) to determine the portion of the deposits that qualify for operational purposes.

Answer: Banks are requested to distinguish between operational and other deposits on a best-efforts basis.

17. In rows 202 and 209, are the counterparties BIS, IMF, ECB and European Community treated the same as domestic sovereigns, multilateral development banks or domestic PSEs with a 20% risk-weight, or do they fall into the category "other counterparties"?

Answer: Only transactions with specific domestic counterparties should be included in lines 202 and 209. The institutions listed in the question are not domestic but international counterparties.

18. Regarding unsecured wholesale funding run-offs, does "where the market expects certain liabilities to be redeemed before their legal final maturity date" (paragraph 86 of the Basel III LCR standards) mean that where the counterpart expects a liability to be redeemed with applying established methods of financial mathematics, then this liability should be modelled with early termination in the LCR?

Answer: Yes, banks and supervisors should assume such behaviour for the purpose of the LCR and include these liabilities as outflows. Also, for funding with options exercisable at the bank's discretion, supervisors should take into account reputational factors that may limit a bank's ability to not exercise the option. This could reflect a case where a bank may imply that it is under liquidity stress if it did not exercise an option on its own funding.

19. Regarding Section 6.1.2 of the instructions on credit and liquidity lines: the definition of "general working capital facilities" suggests that facilities without an explicit function that can be used for various products (money market for short-term business, loans for longer-time business) should be defined as credit facilities. Is that correct?

Answer: General working capital facilities for corporate entities (eg revolving credit facilities in place for general corporate and/or working capital purposes) will not be classified as liquidity facilities but as credit facilities.

20. Suppose a transactional retail deposit holds €90k. €40k is fully insured by an effective deposit insurance scheme, €20k is partly insured (eg for 95%) and €30k is not insured. Which amount may be treated as 'stable'?

Answer: Only the amount that is fully insured can be treated as stable. So in the example, €40k may be treated as stable deposits. The other €50k are only partly insured or not insured and should therefore be reported as less stable.

21. Suppose a non-operational deposit provided by a non-financial corporate holds €125k. The deposit insurance scheme in the jurisdiction where the deposit is placed meets the requirements for an effective deposit insurance scheme, providing full insurance on deposit amounts up to and including €100k. How should this deposit be treated?

Answer: The non-operational deposit does not meet the eligibility requirements for the 20% run-off factor as the entire amount of the deposit (ie €125k) is not fully covered by the effective deposit insurance scheme (given the deposit insurance limit is €100k). This deposit should not be reported in line 157, rather it should be reported in line 158 (and assigned a 40% run-off factor).

22. How should balances in savings accounts which can be withdrawn at any time be treated? Should we assume such accounts mature within 30 days?

Answer: These should be treated similarly to demand deposits if the bank allows depositors to withdraw such balances without applying a significant penalty that is materially greater than the loss of interest.

23. In paragraph 114 of the Basel III LCR standards, it is assumed for secured funding transactions that involve Level 1 assets that no reduction in funding availability against these assets is assumed to occur due to their high-quality nature. For Level 2A assets, for example, a 15% reduction in funding availability will be assigned to maturing secured funding transactions backed by these assets and conducted with counterparties other than the bank's domestic central bank. Under this assumption, if a bank engaged in a $100 repo transaction backed by a Level 2A asset with a counterparty other than the bank's domestic central bank, only $85 would be assumed to roll over. Is the $15 that is assumed not to roll over eligible for the stock of high-quality liquid assets, subject to the appropriate haircut?

Answer: No. The $15 represents a loss of funding and is taken into account as a cash outflow (the denominator of the ratio) as a result of the 15% weighting in line 195, rather than be incorporated in the stock of liquid assets.

24. The Basel III monitoring instructions state that "the amount of a commitment to be treated as a liquidity facility is the amount of the currently outstanding debt issued by the customer (or proportionate share, if a syndicated facility) maturing within a 30 day period that is backstopped by the facility. The portion of a liquidity facility that is backing debt that does not mature within the 30-day window is excluded from the scope of the definition of a facility. Any additional capacity of the facility (ie the remaining commitment) would be treated as a committed credit facility and should be reported as such." Please clarify how the supporting lines are included in the LCR calculation.

Answer: When short-term debt, such as commercial paper, has a liquidity line as support, only the portions of the line that are supporting issued and outstanding debt that matures within 30 days and that which, in addition, could be used within the 30-day timeframe (ie the available, unused capacity) are to be included in the LCR calculation.

For example, assume $75 of debt is currently outstanding, of which $50 is due within 30 days and the remaining $25 balance is due beyond 30 days. This paper is backed by a $120 liquidity facility. The amount of the facility to be included in the LCR calculation as a liquidity facility is $50. The $45 in available, unused capacity (calculated as the total line of $120 less the $75 in

outstanding debt) would be prescribed the credit facility draw rate associated with the counterparty type to which the facility is provided. The $25 of debt due outside the 30-day window would not be included in the LCR calculation (since that $25 is funded by debt that could not come due within the 30 days hence no resulting bank outflow could occur within the LCR horizon).

5.2.3 Cash inflows

25. According to the instructions to rows 302 to 305, interest payments should be reported as part of contractual inflows. However, interest payments are an element that is currently not observed in this kind of reporting, and retrieving data on this will be challenging given the timeframe and current IT set-up.

Answer: We recognise that there are many complications facing institutions in this early monitoring stage, particularly related to IT changes to collect and populate the Basel III monitoring template. For purposes of the exercise, institutions are requested to provide data on a best-efforts basis.

26. What is the purpose for row 324 regarding the cap on cash inflows compared to cash outflows?

Answer: Row 324 calculates the maximum amount of cash inflows – ie 75% of cash outflows – to be taken into account in the quantification of net cash outflows, in line with paragraph 144 of the Basel III LCR standards. A cap on total inflows is introduced to prevent banks from relying solely on anticipated inflows to meet their outflows and also to ensure that a minimum amount of liquid assets is held by the bank (ie a minimum of 25% of cash outflows). Row 323 of the worksheet includes the amount of cash inflows before application of the cap, whereas row 325 of the worksheet includes the amount of cash inflows after application of the cap. In cases where the cap on inflows is binding, row 325 will be less than row 323 (and will equal row 324), whereas in cases where the cap on inflows is not binding, row 325 will be equal to row 323.

27. According to paragraphs 171 and 172 of the Basel III LCR standards, when consolidating the LCR, the excess of buffer on an entity can be counted on consolidated LCR only when assets are transferable. Does the liquidity transfer depend on the type of asset (cash, sovereign bonds, corporate bonds, …) or does it depend only on characteristics related to the reporting entities (incorporation country, …) and in that case the whole excess is treated in the same way (and no different restrictions are applied according to the product type)?

Answer: When considering whether excess liquidity on a legal entity basis can be included in a firm's consolidated LCR, the firm should consider the provisions outlined in paragraphs 36 to 37 and 171 to 172 of the Basel III LCR standards. In particular it should demonstrate that:

- these excess liquidity buffers are freely available in times of stress for the consolidated firm to use;
- the firm has all liquidity transfer restriction to the extent applicable, captured and accounted for in their assessment of available excess liquidity;
- the convertibility of currency, from the local jurisdiction in which the excess liquidity buffer resides, exists to meet the liquidity needs at the consolidated level and that this convertibility is available during a time of crisis;
- an asset, not in the form of cash, can be converted and transferred to the consolidated firm during a time of crisis.

5.3 NSFR

28. Where the template provides encumbrance terms greater than one year for assets with maturities less than one year, such as in rows 72 and 76, is it simultaneously possible to have securities with maturities less than one year that are encumbered for greater than one year?

Answer: It is technically possible to encumber assets for longer than their maturity. For example, a bank may transact a one-year repo against a basket of securities and pledge a security that matures in six months. The bank would therefore be required to replace matured covered assets. The same effect could occur in securitisations of revolving assets, such as credit card receivables. If a bank does not undertake this type of activity then it has nothing to report.

29. Regarding secured borrowing in lines 43 through 47, are repos, collateral lending and covered bonds included in this field?

Answer: Yes, the definition of secured borrowing is the same as that used in the LCR: it defines secured funding as "those liabilities and general obligations that are collateralised by legal rights to specifically designated assets owned by the borrowing institution in the case of bankruptcy, insolvency, liquidation or resolution".

30. Regarding Section 6.2 and in particular Section 6.2.2, of the instructions, please provide additional guidance on how we should treat encumbrances that result from reasons other than pledging or secured funding transactions (ie tied positions).

Answer: Encumbrance should be treated in the same manner regardless of the reason.

31. Where should data for insurance companies, investment companies, etc be reported?

Answer: Data for these entities should be reported in rows 32 and 47 as they are funding from "other legal entities".

32. In what row should the market value of financial instruments be reported? Are the reported figures supposed to be net figures?

Answer: Assuming that "financial instruments" means derivatives, they should be reported as outlined in Section 6.2.2 of the instructions.

33. Concerning reverse repos, the instructions say they should be treated as secured cash loans.

- In which line(s) should they be reported? As loans depending on the counterparty? If so, this treatment does not seem to agree with paragraph 28 of the Basel III NSFR standards (if the bank will receive cash, then the RSF of the transaction would be 0%).

  Answer: Reverse repos should be reported as cash loans according to counterparty. Paragraph 28 is only applicable to assets on balance sheet. Most accounting standards do not result in such assets being recorded on a bank's balance sheet.

- What distinction is made for the different underlying assets (Level 1, Level 2A, Level 2B, others)?

  Answer: No distinction is made.

- What maturity should be considered for RSF, the maturity corresponding to the reverse repo or that of the underlying security?

  Answer: The maturity of the reverse repo (secured loan).

- If the asset received in the reverse repo has been sold or re-hypothecated (thereby creating a short position), how should it be reported?

  Answer: The loan should be reported in the applicable RSF category according to its maturity, and then it should also be reported as encumbered for the period of

encumbrance in the relevant sub-lines of that category. For more information refer to Section 6.2.2 of the Basel III monitoring instructions.

34. How are assets excluded from Level 1 and Level 2 in the LCR because they do not meet the operational requirements (line 59 of the "LCR" worksheet) treated in the NSFR?

Answer: The operational requirements which apply to the LCR are not relevant in the NSFR.

35. The current definition of line 261 (all other assets not included in the above categories) could potentially generate misleading results. A more granular approach would be beneficial for a better understanding and a more accurate reporting of balances.

Answer: Firms can provide to their national supervisors explanatory notes detailing significant exposures in this category upon request.

36. Rows 177 to 186 refer to "residential mortgages of any maturity that would qualify for the 35% or lower risk weight under the Basel II standardised approach for credit risk". Among the "encumbered" classification, it would be useful for analysis purposes to insert a specific sub-category ("of which") with the self-securitisations.

Answer: As this type of encumbrance is not treated differently from other types, no distinction is made in the template. Assets encumbered in self-issued or synthetic (own-name) securitisations should only be reported as encumbered if the securities have been encumbered outside of the reporting entity. For example, if the securities being held by the institution have not been pledged and are still available to raise funding, then the underlying assets can be reported as unencumbered.

37. Concerning net derivatives payables/receivables in lines 48 and 257, is there a reporting distinction for differences in maturity?

Answer: No distinction is made for maturity.

38. Should the time buckets fit the generally binding accounting standards and include the upper bound (≤ 3 months, > 3 months and ≤ 6 months etc)?

Answer: The standard is measured at one year or greater, and the quarterly buckets were calibrated accordingly.

39. What is the applicable RSF for a plain vanilla reverse repo on a Level 1 asset? Is it 100% as we have to look at the long-term claim which is on the balance sheet or 5% for the collateral held unencumbered? In the first case, is there any liquidity value considered in the NSFR for the Level 1 asset?

Answer: For the purpose of the Basel III monitoring exercise, a reverse repo of any asset for longer than one year is 100%. Therefore, no liquidity value is assigned to the borrowed asset.

40. Some mortgages and loans are only partially secured and are therefore separated into secured and unsecured portions with different risk weights under Basel II. How should these portions be treated in the NSFR template?

Answer: Only the portion of the loan with the appropriate risk weight should be reported. The separate portion at a different risk weight should be reported in the row to which it relates. For purposes of Basel III monitoring reporting, institutions can assume that the secured portion of the loan applies to the longest dated (> one year) part of the loan, so long as it remains encumbered for that entire period.

41. Where are "short" selling transactions reported in the NSFR template?

Answer: Where collateral borrowed through a reverse repo has been sold or rehypothecated in a repo or similar transaction in which the firm intends to repurchase the collateral, the resulting cash inflows and outflows are assumed to offset and therefore should not be reported. In such

cases the initial reverse repo loan should be reported as encumbered in the applicable RSF category according to the counterparty of the initial reverse repo loan and the term of encumbrance of the initial reverse repo loan.

42. Net known derivatives (payable or receivables) should be reported in the LCR as well as the NSFR. It is clear that any known (ie non-contingent) cash flow that will take place within 30 days on derivative positions should be included on a net basis (different lines if payable or receivable). However, should FX spot transactions (spot outright (an exchange between two currencies) and not forward contracts) be taken into account? If they should be included in "net know derivatives", are they treated the same if they have same day settlement or if settled with two-day lag (T+2)?

Answer: Known cash flows related to FX spot transactions should be included in the net known derivatives payable/receivable lines of the LCR template, regardless of the settlement date (providing it is within the 30-day period).

43. How should the portion of amortising loans that comes due within one year be reported on the NSFR template?

Answer: Per paragraph 26 of the Basel III NSFR standards, "for amortising loans, the portion that comes due within the one-year horizon can be treated in the 'less than a year' residual maturity category". Where possible, banks should allocate the amortising portion across the four quarterly (three-month) time buckets on the NSFR worksheet.

6. Trading book

6.1 The revised boundary

1. If banks want to include instruments from the (trading book) presumptive list (paragraph 11 CP2) in their banking book do they need supervisory approval beforehand?

Answer only for the purpose of this QIS: No. They do not have to but they can ask for approval beforehand to avoid difficulties (eg with accounting) if the supervisor does not agree to the view of the bank.

Note that for the actual implementation of the revised boundary, paragraph 12 states: "If a bank believes that they have to deviate from the presumption list for a certain instrument, the bank must submit a request to its supervisor and receive explicit approval. In cases where this approval is not given by the supervisor, the instrument must be switched to the trading book." See as well paragraph 20 c "Banks need to document any actual deviations from the general presumptions in detail, in a timely manner, and report the nature and extent of these deviations to their supervisor" and paragraph 8 "The supervisor may require the bank to designate an instrument to the trading book if the supervisor is of the view that a bank has not provided enough evidence to support the assignment of an instrument to the banking book, or if the supervisor believes such instruments would customarily belong in the trading book."

2. If a bank uses an instrument for different purposes (eg market making and asset liability management) can the respective position in the instrument be assigned to different books?

Answer: Yes. The term instrument is used in CP 2 to emphasize that a complete instrument and not a risk position (eg only IR-Risk) should be assigned to a book. Fundamental to the new approach is the view that relevant information (focused on how positions are risk-managed as trading positions) will indicate the instruments that should be designated as trading positions. The revised boundary approach better allows banks to assign both assets and liabilities

managed as a portfolio into the same book (page 7 CP 2). This was implemented in the rules text in paragraphs 4 and 5. In this regard, if a bank hold a government bond because of one of the purposes listed in paragraph 4 it must be assigned to the trading book(eg market making). If the bank has an additional position in the same bond, but not for purposes listed in paragraph 4 it must be assigned to the banking book. Paragraphs 7 and 8 should be read with the same understanding. Supervisors would not always require moving all positions[3] in an instrument; instead they could require moving dedicated positions in an instrument.

3. If an instrument is not allowed in the trading book, what happens to the associated hedges (eg for securitisation warehouse positions)?

   Answer: Micro-hedges associated with instruments not allowed in the trading book must be assigned to the banking book.

4. Is a position assigned to a book on an instrument or a risk position basis?

   Answer: The rules are designed on the basis of a position in an instrument, so an assignment of different risk positions resulting from a position in an instrument (eg interest rate risk and credit spread risk of a bond) to different books is not possible. A special example for this are embedded options, which do not have to be assigned standalone. Instead the instrument with the embedded option has to be assigned based on the characteristics of the overall instrument. As a result the presumption in paragraph 11(g) only applies to pure option instruments. Multiple positions in an instrument could be assigned to different books if banks use the instrument for different purposes (see FAQ 6.1.2)

5. Is it possible to assign the liquidity buffer/reserve to the banking book? Do banks have to assign the liquidity buffer/reserve to the banking book?

   Answer: Positions in the liquidity reserve can be assigned to the trading book and banking book on a position basis, according to the proposed standards in CP 2.

   The fact that an instrument is held for the purpose of maintaining the liquidity buffer can be regarded by supervisors as an acceptable rational for approving a deviation from the general presumption list (ie if an instrument is to be assigned to the trading book according to the general presumption list, but the bank proves it is held for the purpose of maintaining its liquidity buffer, the supervisor may grant its approval for booking the instrument into the banking book).

6. How are internal risk transfers occurring within the trading book itself treated (ie whether there are any conditions attached to this recognition)?

   Answer: Internal risk transfers within the scope of application of the market risk capital charges (ie between trading desks) are allowed. Such allowance is not premised on any additional requirements. Instruments which are used for internal risk transfers have to fulfil the same trading book requirements as instruments arising from external deals.

7. For a bank adopting a partial use approach (eg a bank on the standardised approach for market risk in the trading book, and the foundation-IRB approach for credit risk in the banking book), how should panels A and B be filled in?

   Answer: Panels A and B (see p 113 of the Instructions) are to be calculated as follows:

   Panel A: for all portfolios independently from current partial use approach of the bank.

[3] "Position" does not mean that an instrument can be decomposed into individual risk positions, it only refers to the quantity of the instrument which is hold for a specific purpose (eg market making).

Panel B: along current partial use approach of the bank.

For avoidance of doubt, panel B consists of trading book standardised approach (columns E and F), banking book advanced (columns G and H), and banking book standardised (column I).

8. How should panel A of the "TB Boundary TP" worksheet be calculated?

Answer: Calculations are required to be performed for each test portfolio in its entirety, first as if the whole test portfolio were classed as being in the trading book (eg cells C6 and D6 for equity standardised approach) and then re-calculated again as if the whole test portfolio is classed as being in the banking book (ie cell E6 for equity risk in the standardised approach). Banks should not arbitrarily attempt to split the trades in each portfolio between the trading book and the banking book (ie in rows 4 to 18 in the trading book cells C6 and D6, and TP trades in rows 19 to 33 in the banking book cell E6).

9. How should panel C cells A25 to H34 and C39 be filled in? Should securities in the test portfolio be included?

Answer: In this panel, only a bank's real portfolio (not the test portfolio) is to be mapped onto the presumptive list. Data from real trading book and banking book portfolios should be entered. Deviations from the presumptive list should be entered from data from real portfolios.

Negative values can occur in this panel.

Deviations (presumption list vs internal mapping) should be explained in a separate Word file (see page 114 of the Instructions).

10. In the worksheet "TB boundary TP", how should the "quantity" value be read? Does it refer to the number of contracts, to the notional, or any other value?

Answer: For equity portfolios, the "quantity" column refers to a number of contracts. For all the other asset classes, it refers to notional.

11. Based on the draft specification of the test portfolios, the bank is only able to trade in a few of the listed instruments. May the bank ignore the instruments that it is not able to trade in? For portfolios where the bank is only able to trade one or two instruments, may the bank ignore such portfolios?

Answer: Yes, the instruments which the bank is not able to trade in can be ignored.

12. Do cells E6 to E10 refer to capital for credit risk in the banking book?

Answer: Yes.

13. How should valuations of the test portfolio trades in the banking book be calculated? Should they be valued at cost, or daily mark-to-market (MTM)?

Answer: They should be calculated based on MTM valuation.

14. Is it possible to assign the liquidity buffer/reserve to the banking book? Do banks have to assign the liquidity buffer/reserve to the banking book?

Answer: Positions in the liquidity reserve can be assigned to the trading book and banking book on a position basis, according to the proposed standards in CP2.

15. What is the definition of CVA (ie based on regulatory or accounting standards)?

Answer: The definition and calculation of CVA should follow the *International Convergence of Capital Measurement and Capital Standards* (June 2006). Defined in the mentioned document, CVA is an adjustment to the mid-market valuation of the portfolio of trades with a counterparty. This adjustment reflects the market value of the credit risk due to any failure to perform on contractual agreements with a counterparty. This adjustment may reflect the market

value of the credit risk of the counterparty or the market value of the credit risk of both the bank and the counterparty.

6.2 The revised Internal Models Approach

For questions regarding panel A of the "TB IMA general" worksheet please also refer to the FAQs on panel A2 on the "Requirements" worksheet in Section 2 above.

1. What is the correct interpretation of paragraph 181 (d) in CP2: "The set of reduced risk factors must be able to explain a minimum of [75%] of the variation of the full ES model"? Is it correct to interpret that the ES of the residual portfolio must be less than 25% of the full factor ES figure?

   Answer: The ES of the residual set of risk factors must be less than 25% of the fully specified ES figure. This measure should be calculated as an average of the preceding 12-week period.

2. Under paragraph 186 (c), should FX and commodity options be subject to the IDR capital charge (as they have interest rate risk, even if this is minimal)? What about interest rate derivatives? Based on the same paragraph, why should defaulted debt positions be included in IDR?

   Answer: The scope of IDR includes any position with exposure to default risk (including sovereigns). In particular all bonds and equity instruments are in the scope of the IDR, as well as all derivatives written on these instruments. But the impact of a default on other market instruments should not be captured.

3. In paragraph 186 (c), how should default of an issuer of an equity be treated in the model?

   Answer: For equity positions included in the model, the default of an issuer must be modelled as resulting in the equity price dropping to zero.

4. Under paragraph 183 (c), risk factors deemed modellable are those which have "real" prices for a sufficient set of representative transactions, with at least 24 observations per year. Should the 24 observations per year be captured over the entire 10-year time series, or over the last one year? Is it acceptable to generate older data when the quality of recent data is good quality?

   Answer: The requirement for 24 observations per year applies to the period used to calibrate the current ES model. It is acceptable to generate older data extending beyond this period, but when applied this approach must be documented and subject to supervisory review and approval.

5. In paragraph 181 (d), is the ratio of $ES_{F,C}$ over $ES_{R,C}$ to be floored at 1?

   Answer: Yes.

6. Under paragraph 181 (g), it is stated that "supervisors may permit banks to use models based on either historical or Monte Carlo simulations". Can banks also be permitted to use other types of models?

   Answer: Supervisors may permit banks to use models based on appropriate analytical methods other than historical or Monte Carlo simulations.

7. Should the time period used for determining ACC_{avg} in paragraph 181 (j) and ($IMCC_{avg}$ + SES_{avg}) referenced in paragraph 189 be consistent?

   Answer: Yes. Paragraph 189 should refer to a "weighted average of the previous 60 days scaled by a multiplier (m_c)."

8. In paragraph 189, is the reference to "desk-level $ES_{R,S,i}$" correct?

Answer: The sentence in Paragraph 189 which references "desk-level $ES_{R,S,i}$" should now read: "The stress period used in the risk factor-level $ES_{R,S,i}$ should be the same as that used to calculate the portfolio-wide $ES_{R,S}$."

9. The ongoing validation of the qualitative standards (paragraph 180) should be further specified. What would be the frequency of ongoing validation?

Answer: A distinct unit must conduct the initial and ongoing validation of all internal models. Internal models must be validated at least on an annual basis.

10. Under paragraph 778 (iv) in page 113 of CP2, should the references to "specific risk" be removed?

Answer: Yes. This paragraph should now read: "Where supervisors consider that limited liquidity or price transparency undermine the effectiveness of a bank's model to capture risk, they will take appropriate measures, including requiring the exclusion of positions from the bank's model. Supervisors should review the adequacy of the bank's measure of the incremental default risk capital charge; where the bank's approach is inadequate, the use of the standardised specific risk charges will be required."

11. Is footnote 37 on page 89 of CP2 meant to refer to desks exposed to issuer default risk, and not "credit risk"?

Answer: Yes. Footnote 37 should now begin as: "Desks with exposure to issuer default risk must pass a two-stage approval process…".

12. The reporting date T for the trading book worksheets is 29 August. In the worksheet "TB IMA backtesting – P&L", banks are required to provide data up to T+43. How are banks supposed to submit data in September if some risk measures refer to dates in October?

Answer: By the initial data submission deadline in September banks are requested to fill in as many columns as possible, depending on the calendar of trading days in their jurisdiction. After the initial submission in September, banks should still collect the data for the following dates up to the 43rd trading day after 29 August, as they will later be requested to submit these data.

13. In cells C6 to F12, are banks supposed to fill in the capital charges and exposure amounts according to the standardised approach for the whole trading book? Or should banks fill in the capital charges and exposure amounts according to the standardised approach only for unapproved desks?

Answer: Banks should fill in the capital charges and exposure amounts according to the standardised approach only for unapproved desks. Please refer to the table on page 10, Section A)1).

14. Cell B48 states that "ACCt-1 as defined in paragraph 176 (j)" should be used. Is this incorrect?

Answer: This is an incorrect paragraph reference. The correct reference should be "ACCt-1 as defined in paragraph 181 (j)".

15. Liquidity horizons for "Equity price" and "Equity price ATM volatility" are divided into "large cap" and "small cap" as given in Table 2 on page 16 of CP2. In circumstances where a bank cannot differentiate between large and small cap, would it be acceptable to apply the longer horizons (ie 20 days for "Equity price" and 120 days for "Equity price ATM volatility"?

Answer: Yes.

16. In the table on page 132 of the instructions, is the description for rows 216 to 316 correct?

Answer: No. The description should read "This risk measure is defined in Annex 3 of this document".

17. Can banks use the current IRC scope for the purposes of calculating the IDR capital charge?

Answer: No. Equity positions should be included within IDR as stated in paragraph 186 (c) of CP2.

18. In cells C40:D47 on the worksheet "TB IMA general", are banks supposed to fill in the capital charges according to the standardised approach for the whole trading book or should banks fill in the capital charges according to the standardised approach only for unapproved desks?

Answer: In line with cells C6:F12 on that worksheet, cells C40:D47 do refer to unapproved desks only (see FAQ 13).

19. Concerning the worksheet "TB IMA general", cells C13, C19 and C21, should we report the maximum of the average of the measure over the last three months, or the last measure?

Answer: You should report the last measure.

20. For column M of the JiLP template (ie "proportion of linear products"), the Instructions say "The percentage of the asset value of instruments held by the desk whose value moves in proportion to the value an underlying exposure compared with instruments whose value changes non-linearly". Does this mean that if my linear products are +100, and my non-linear ones are -20, I should report 100/20=500? If so, what should I do if I have no linear products?

Answer: The instructions are to be read "the ratio of linear divided by total". In your example, you should report 100/(100+20)=83 (given you should report in percentage unit).

21. (i) Although we understand from the Instructions that interest rate swaps should be aggregated on "notional amount" basis, what would be the "notional amount" for cash equities, cash bonds, foreign currencies, commodities and derivatives (swap, futures, options, etc), respectively? (ii) Is it ok to aggregate on "notional amount" basis the instruments with varying duration risks such as cash bonds? (iii) Also, while "positive notional amount" and "negative notional amount" are linked to "long exposure" and "short exposure", respectively, how can we judge whether a dual leg instrument such as a swap is "long" or "short"?

Answer: (i) The amount to be reported should be the notional amount in all cases. (ii) Yes, aggregation should be done on notional amount. (iii) For the direction of long short, the long (short) amount is a position in which a fall in the value of the equivalent or underlying cash instrument results in a loss (gain). Thus, a receive fixed interest rate swap is a long position as it has equivalent exposure to interest rate risk as a long position in a bond (since a rise in interest rates would result in a loss for both the bond and the receive fixed interest rate swap).

22. What exactly is the single-name underlying? Does it mean derivatives with single-name underlying other than indexes or governments? Also, can we exclude instruments with multiple-name underlying such as worst-of EB or FTD?

Answer: For column W, single name underlying refers to exposures to specific companies, commodities or local authorities, compared with exposures to indexes or governments or benchmark rates. Such exposures could be in the form of a derivative contract (eg CDS on company ABC) or cash instrument (eg bond issued by company ABC). Yes, multi-name instruments can be excluded.

23. When will the closed-form questions on the worksheet "TB IMA general", panel F (cp Instructions, pp 111 and 130) be specified and communicated to the banks?

Answer: It is planned to distribute the questions prior to the 12 November 2014 resubmission deadline but not before 24 October 2015.

6.3 The revised standardised approach

1. Should banks not using the internal models approach fill in panel A of the worksheet "TB IMA general"?

   Answer: Yes, they should.

2. For the two "TB SBA" worksheets, should we report negative numbers as negative or as positive?

   Answer: *All* the numbers in this QIS should be reported as positive numbers (eg, even short positions should be reported as positive quantities). Only in the following cases should negative quantities be reported as negative:

   - For panels A to E, all the columns which header is Sb (for both Delta, Curvature, and Vega risks);
   - In the panel A only (GIRR), all the CVRk cells (ie the columns AD to AN, rows 6 to 36);
   - In the panel E only (FX), the column Σrho (ie the column I, lines 150 to 180)

3. Should the standardised approach be applied with no separation between trading desks, or should the risk measures and capital charges be calculated separately for each trading desk and then summed together (in the same way as the regulatory capital charge associated with risks from unapproved desks as defined in paragraph 193 in CP2)?

   Answer: For the "TB SBA current" and "TB SBA revised" tabs, banks should report standardised charges at the bank level (diversification allowed across desks). For the "TB IMA risk measures-stress" tab, banks should report standardised charges at the desk level.

4. Could you clarify the way the disallowance factor should be applied in the context of several curves (ie for GIRR and CSR)?

   Answer: We clarify that the aggregation rules apply between the summed positive sensitivities and negative sensitivities.

   As an example, suppose a bank has only two instruments having non-null sensitivities only to the GIRR vertices 1, 2 and 3 years.

   The respective sensitivities of instruments 1 and 2 are reproduced below.

Instrument 1	1Y	2Y	3Y
EONIA	1	10	2
BOR	2	6	1

Instrument 2	1Y	2Y	3Y
EONIA	-2	-15	-3
BOR	3	4	-4

Net sensitivities to each tenor on the required single curve should be computed as follows:

	1Y	2Y	3Y
Positive	1+2+3=6	10+6+4=20	2+1=3
Negative	-2	-15	-3-4=-7
Net sensitivities	6+95%*(-2)=4.1	20+95%*(-15)=5.57	-7+95%*3=-4.15

5. Could you specify further the treatment of indices under the Standardised Approach?

Answer: Under the standardised approach, as a general principle the risk factors are not indices: when a bank has a position on an index, the risk factors are defined based on the underlying of the index. When such a breakdown is not possible, then the treatment defined in para 10.(b) applies, ie "[…] *banks can consider the traded index as a risk factor on its own. In this case the index is assigned to the bucket with the largest risk weight for any constituent part of the index. If the maximum risk weight is shared by constituents from different bucket, the index is assigned to the bucket with the lowest bucket number*".

6. Under some circumstances, it could happen that the number below the square root in the Kb formula turns out to be negative. How should those cases be handled?

Answer: For this QIS, in such cases the number below the square root should be floored at zero and banks should provide separate documentation (ie asset class, bucket, aggregation step) for cases when the zero floor is applied.

7. Specifically, with regard to the risk weight chart included in paragraph 30 on page 35 of the text, we question the approach of codified absolute stress levels as these would not seem to appropriately account for varying levels of the underlying risks. In some cases, a shock of 150 bps for one year will not be appropriate; for example, if the underlying vertex being stressed is less than this value.

Answer: The calibration of the shocks will not be changed during the QIS; firms should adapt their models in order not to get unrealistic results when possible.

8. For the FX risk calculation in the standard method, the "risk factors" are the currencies and so there appears no need for the second "bucketing" step in order to calculate FX capital. However, the QIS template is asking for Kb, Sb and other bucket level metrics at the risk-factor level. Can the Committee provide clarification of what data they would like submitted for FX risk?

Answer: Though the Sb variable is not required according to draft standards, it will be used for potential re-calibration of the approach.

Paragraph 59 of the draft standards is indeed not applicable as only one risk factor is defined per bucket (since one bucket is one currency). As a consequence, panel E for Delta risk is changed as follows. ΣWS2 (column H) should now read $Sk^{(+)}$ as defined in the section related to GIRR. Σrho (column I) should now read as $Sk^{(-)}$. Columns F (Kb) and G (Sb) should not be filled.

9. Can we assume real estate to be in the finance industry?

Answer: At this stage, the Basel Committee does not consider issuing guidance more precise than the "most material activity" criterion as set out in paragraph 49.

10. Non key sensitivities – sensitivities to non-key risk classes, eg rates from commodities or equity positions, are typically only available at book/portfolio level. Does the standardised approach require these to be treated as individual positions, or can these be treated as single positions (within each bucket)?

Answer: The SA does not distinguish between "low" or "high" materiality of the sensitivities. As a consequence, the "non-key sensitivities" should be treated as individual positions, just as the other sensitivities.

11. Paragraph 14, page 149, refers to securitisation risk factors by vertices, however these tenors are not used in the subsequent buckets. Further, spreads are typically defined by asset class, rating, structure, tranche rather than tenor. Given that the tenor information is not used in subsequent calculations, we assume this information will not be required?

Answer: Though the risk weight is the same for each tenor within one bucket, sensitivities should be computed to the five regulatory tenors of the curve.

12. Paragraph 54 in Annex 3 of the instructions specifies correlations applicable between net sensitivities across non-residual buckets and sensitivities within the residual bucket. This seems to be in contradiction to the general framework description at Annex 3 paragraph 8(d), which simply adds the residual bucket capital with no diversification. It is confirmed by the design of Panel C of the TB SBA sheets in which the residual bucket total net sensitivity, Sb, is greyed (cell G119). Please clarify?

Answer: Though the two are the same (simple sum of capital charge, and unique capital charge with correlations set at +1/-1), it can be assumed that paragraph 54 is redundant and can be ignored.

13. In the calculation of credit spread risk, in which stage does the aggregation across names need to be performed?

Answer: The following steps should be followed: First, apply full offsetting of positions in identical instruments. Second, apply netting of sensitivities to the same risk factor (same name and same vertex) subject to a disallowance. Third, aggregate netted sensitivities across term structure and names based on correlation structure within each bucket.

14. Could you clarify how to compute K residual?

Answer: K residual is computed similar to Kb, where risk weights are defined for a residual bucket.

15. On page 159 the inflation weight has been given a bps unit, should we take this unit into account?

Answer: No, ignore bps for the inflation risk weight (this risk weight is to be applied the same way as the other risk weights).

16. The treatment of CSR securitisation for the correlation trading portfolio seems unduly punitive.

Answer: Paragraph 39, page 156, describes the treatment of the Correlation Trading Portfolio (CTP) for credit spread risk (CSR): The same risk weight structure as the CSR non-securitisations applies to the sensitivities arising from the CTP. This approach is consistent with the treatment of CSR non-CTP.

17. With regard to the "sticky delta" requirement - In practice, an option book may be risk-managed on a sticky strike or sticky delta basis, depending on the prevailing market condition. In addition, an IMA bank may choose between sticky strike and sticky delta as long as the corresponding Vega risk capture is consistent with the delta/gamma risk capture. Forcing one approach may create operational obstacles for the QIS implementation and also lower data

quality (eg if a firm use sticky strike, then the sticky delta measure is only produced for regulatory capital purpose and not being looked by Risk Managers and Business).

Answer: We reinforce the fact that the sticky delta requirement is the approach coherent with the calibration of the risk weight and one of the concerns of the Basel Committee with regard to capital variability. It will not be changed for this QIS.

18. According to instructions, is Vega intended as a shock to the ATM point or the entire volatility surface?

Answer: As under the current "delta plus approach", which serves as a basis of the revised treatment, only the ATM point of the volatility surface is to be shocked.

19. The formula for curvature risk has changed: the last term has a negative sign instead of a positive sign in the previous version. We found the previous version more intuitive to understand. Could you please confirm the calculation and clarify the reasoning behind this change?

Answer: In summary: Only a "net short" curvature risk exposure attracts a capital charges. It is represented by a positive number. In detail: The expression in square brackets in para 10(a) is positive when the bank has a "long" curvature risk exposure ("long gamma"). It is negative when the bank has a "short" curvature risk exposure ("short gamma"). The min-operator will deliver a negative number when the bank has a "short" curvature risk exposure for the upward or downward shift. The minus sign converts this into a positive number. Likewise, a "long" curvature risk exposure is represented by a negative number. Para 10(c) aggregates the curvature risk exposures for risk factor k across all instruments i. The net curvature risk position is positive if the "short" curvature risk exposures prevail, otherwise negative. The max-operator in para 10(d) ensures that a negative net curvature risk exposures (ie a net "long" curvature risk exposure) does not attract a capital charge. Nonetheless even a net "long" curvature risk exposure enters the cross terms, ie to an extent it is still recognised as a risk mitigant for net "short" curvature risk exposures for other risk factors.

The point raised by the question on the sign of the last term and on the denominator of the ratios is correct.

For the GIRR and CSR risk factors, the curvature risk exposure with respect to risk factor *k* is to be computed for each instrument *i* using the following formula:

$$CVR_{ik} = -\min\left[\begin{array}{l}\left(V\left(x_k + RW_k/10000\right) - V\left(x_k\right)\right) - RW_k/10000 \cdot s_k \\ \left(V\left(x_k - RW_k/10000\right) - V\left(x_k\right)\right) + RW_k/10000 \cdot s_k\end{array}\right]$$

For the equity, commodity and FX risk factors, the curvature risk exposure is to be computed for each instrument *i* with respect to the risk factor *k* using the following formula:

$$CVR_{ik} = -\min\left[\begin{array}{l}\left(V\left(x_k + RW_k/100\right) - V\left(x_k\right)\right) - RW_k/100 \cdot s_k \\ \left(V\left(x_k - RW_k/100\right) - V\left(x_k\right)\right) + RW_k/100 \cdot s_k\end{array}\right]$$

20. Currently our approach to risking some non-securitisations asset backed positions includes a Vega risk to reflect the prepayment component. Would this be considered an option under the SBA and therefore subject to curvature and vega charges?

Answer: A prepayment option is subject to optional risks. Please see paragraph 9.

21. Paragraph 80 of Annex 3 prevents any hedging benefit across regions (except for Corporates). Yet, no definition of regions is proposed in the instructions. Shall we rely on the regions used for CTP default risk at paragraph 88, ie North America, Europe and Others?

Answer: Yes, for this QIS, regions are defined similarly to paragraph 88 (ie North America, Europe, and Others).

22. For securitisations excluding the CTP, the reporting is split by credit quality. Could you please clarify whether those credit qualities are with respect to the underlying pool or to the tranche?

Answer: For default risk, the credit qualities are with respect to the securitisation tranche.

23. Should equity be included in the default risk calculation? The text in the instructions only says: "The categories for this purpose are corporates, sovereigns, local governments/municipalities, and securitisations".

Answer: Equity should be included in the default risk calculation. The default risk weight for an equity position is the default risk weight for debt issued by the issuer of the equity security. For example, in the case of a bond issued by Corporation ABC and an equity share issued by the same Corporation ABC, the same default risk weight would be assigned to the JTD loss amounts of both the bond and the equity share. Note, however, that before the default risk weight is assigned to positions, the jump-to-default loss amounts for each instrument should be determined based on the LGD rates for each instrument as in paragraphs 66 to 67 on pages 163 to 164 of the instructions document.

24. For Panel F, 1d)/e), please clarify if the configuration should be 100% for equity and 60% (40%) for debt; or 100% for equity and 60% (40%) for senior debt?

Answer: For panel F.1.d (F.1.e), the LGD of 60% (40%) applies to debt instruments, both senior and non-senior. As in the other panels, equity should be assigned an LGD of 100%

25. In Annex 3, page 15 and page 46 of the instructions have two different formulas for JTD - one floors it at 0 the other does not. Please clarify?

Answer: JTD (long)=Max [LGD × notional – MtM loss, 0] and JTD(short)=Min [LGD × notional – MtM gain, 0]

26. The definition of "Equity", "Mezzanine" and "Senior" provided is not exhaustive, so some positions will fall into none of the three available categories. How do banks deal with such tranches?

Answer: For a tranche that overlaps the attachment/detachment points above, the tranche should be decomposed proportionately into the above standard tranches.

27. Does paragraph 62 mean that "financials" are to be classified as "corporates"?

Answer: Yes.

28. In the worksheet "TB Default CTP", where should we report the bespoke mezzanine products for North America and Europe? Four lines are possible.

Answer: Please fill in the last of the four rows (ie cells L13 to O13), and ignore the others (ie ignore L10 to O12).

29. How should we apply the VR formula to FX options, spread options and basket options?

Answer: For FX options, no Vega risk charge should be computed in this QIS. In other terms, the area L150:M180 and the cell L182 should be left blank. Spread options and basket options should be treated through the relevant residual buckets. It is worth noting that index options should be treated according to Annex 3 of the Instructions.

30. It is asked to multiply the CSR non-securitisation correlation parameter applicable to two same-sign sensitivities arising from the correlation trading portfolio by 1.5 while for aggregate sensitivities with same name/same sign the correlation parameter is 90% and for residual bucket aggregate sensitivities with same sign/same name correlation is 100%. The resulting correlation is therefore higher than 1. Could you please clarify this issue?

Answer: All the correlation coefficients should be capped to 100%.

31. For non-correlation (CTP) securitisation, the Instructions say (on page 34) "…is deemed to be non-CTP, and then the CS01 should be calculated with respect to the instrument rather than the underlying of the instruments". It is not clear what a "CS01 with respect to the instrument" means – many of these instruments may purely trade on price (eg Cash CDO or US non-agency RMBS) and have no spread concept.

Answer: Banks should imply a spread for the purpose of the QIS based on pricing formulas and document such instances.

32. The definition of the commodity risk factors (paragraph 16) is not consistent with the calibration (ie correlation specification, paragraph 56), which is more granular. What definition of the commodity risk factors should we consider?

Answer: Please ignore paragraph 16 and define the commodity risk factors at the level of granularity expressed in paragraph 56.

33. Could you further explain how Δik is defined?

Answer: Δik is defined as "the sensitivity" (sk) as described in further detail in the delta risk part of the draft standards.

34. Regarding CTP, we understand from the worksheet "TB Default CTP" that for IG NA and Europe indices, exposures shall be decomposed in the provided breakdown (cells C9 to C14 and C20 to C25). What about IG NA and Europe bespokes: shall the same breakdown be used or should the definition of equity, mezzanine and senior tranches for securitisation excluding CTP be used (paragraph 82)? For other indices and bespoke, should the definition of equity, mezzanine and senior tranches for securitisation excluding CTP be used (paragraph 82)? Also, regarding CTP, we have three more questions on offsetting: Is full offsetting granted for a given pool within a tranche group as is the case for securitisation excluding CTP (paragraph 82)? If so, should a tranche group be more granular for NA and Europe IG indices in agreement with the breakdown in cells C9 to C14 and C20 to C25? Should offsetting of NA and Europe IG bespokes be granted only on the more granular tranche definition applicable to indices (cells C9 to C14 and C20 to C25) or should full offsetting be granted at the equity/mezzanine/senior tranche level (still assuming paragraph 82 is applicable in the context of the CTP)?

Answer: The QIS for default risk-securitisations requests exposures after taking account of offsetting (netting) of exposures at the granular tranche and security level (eg securities with attachment/detachment points of 10–15%), where the exposures to be reported in the QIS tables are the residual amounts in each category after the allowable offsetting (netting). For determining of such residual exposures, the approach of decomposition and replication should be applied (as specified in paragraph 77 on page 166 and paragraph 91 on page 168). Specifically, if a collection of long positions can be replicated by a collection of short positions then the positions may be offset and only the residual amount would be reported. In this case, the net long (net short) amount would be reported in the corresponding cell of the table under the long (short) column of the table. The offsetting should be performed at the granular actual tranche and security level taking account of the replication and decomposition described above. For instance, a long position in a 10–15% tranche vs combined short positions in 10–12% and 12–15% tranches on the same index/series should be offset against each other. In the QIS tables, the categories of equity/mezzanine/senior are standardised buckets for reporting of

the residual exposures. For instance, the amount reported in the "mezzanine" cell under long would be the residual net long amount from the more granular offsetting of the actual tranches as described above. In this offsetting procedure, it would be likely that both net long and net short residual amounts in different granular tranches would result, so that both the long and short standardised buckets would be populated at the same time.

35. Regarding the default risk (securitisation) method, paragraphs 80 and 81 mention that offset will be allowed across tranches with same attachment point, detachment point and same asset pool, even if maturities differs. Is it possible to split positions in order to offset them? (For example: For a long position on iTraxx 0–10, a short position on iTraxx 0–3 and a short position on iTraxx 3–10, is it possible to split the long position in two tranches 0–3 and 3–10 and then offset the short and long tranches?)

Answer: Yes, positions that are perfect replications by decomposition can be offset (see the answer above). (Note that offsetting is allowed only for the same index and series; see paragraph 92 on page 168 for restrictions on offsetting.)

36. Paragraph 85 mentions that credit exposure on index tranche may be hedged by a position on the index viewed as a 0–100% tranche. However, what will be the correct treatment for FtD (first to default) hedged with CDS single names? (A hedge will be recognised or CDS have to be included in the default risk metric for non-securitisation products, whereas FtD will be part of the securitisation metric?)

Answer: For an nth-to-default instrument, the instrument would be represented as a tranche with attachment and detachment points as specified in paragraph 87 on page 168 (with attachment and detachment points defined as: Attachment point=(N–1)/Total Names, Detachment point=N/Total Names). The offsetting procedure would be as specified for any other tranched structures. Note that for securitisations, the QIS requests only position data taking account of the offsetting (netting) procedure specified in the Instructions, and does not request any capital charge calculation. (In the capital calculation, a hedging benefit calculation is applied to short positions, but this calculation is not requested in the QIS for securitisations.) For the reporting of securitisation positions in the QIS, in the case of related securitisations and single name positions, offsetting is allowed when one position is a perfect replication of the other as specified in paragraph 77 on page 166 and paragraph 91 on page 168. When such offsetting by replication is not possible, or when a residual exposure remains after offsetting by replication is applied, the respective amounts would be reported in the cell for the corresponding type of exposure. (See also the answer the questions 29 and 30 above.)

37. Can you confirm our understanding of the hedging constraints (paragraphs 84 and 85)?

i. For tranches of the same credit index, the tranche segmentation between equity, mezzanine and senior described in paragraph 84 does not apply. For example, long exposure on iTraxx 0–3 can be hedged with positions on iTraxx 3–15 or 15–50.

ii. For each credit index, only one JTDLong and one JTDShort is calculated: for the tranches, the capital charges are calculated with the IRBA methodology and for index positions, the capital charges are a weighting of default risk capital charges according top paragraph 75;

iii. The classification in paragraph 84 is only used to hedge residual positions, for example two bespoke tranches with different asset pool.

Answer: For default risk-securitisations, the QIS requests only position data taking account of the offsetting (netting) procedure specified in the instructions, and does not request any capital charge calculation. (In the capital calculation, a hedging benefit calculation is applied to short positions, but this calculation is not requested in the QIS for securitisations.) Offsetting of long short positions is allowed when the positions can be decomposed by replication as specified in

paragraph 91 on page 167. When offset by replication is not possible, however, the exposures should be reported in their respective long and short categories. For example, in the case of a long position in the iTraxx 0–3% and a short position in the iTraxx 9–12%, these positions cannot be offset and should be reported in the QIS as respectively long and short positions in their respective tranches (because neither is a replication of the other). (See also the answer the questions 29 and 30 above on reporting of the residual exposure in the QIS.)

38. Regarding paragraph 64, how should equity derivatives be managed? In particular options on single stocks and options on equity indexes: are we supposed to calculate JtD as well? In particular, what would be the treatment of correlation risk (ie the simultaneously JtD of two components of the underlying index of an option is not the sum of the two standalone JtD)?

Answer: JTD should be calculated for equity derivatives. The decomposition of contingent and structured products (eg index options) into single name equivalents should be done on a JTD equivalent basis – eg the difference in value of the contingent security assuming that the single name does and does not default, with zero recovery.

39. Regarding the worksheet "TB Default CTP", how should MV be reported for swaps? Where should MV and notional for mezzanine bespoke tranches be reported (four lines are available)?

Answer: For swaps, MV should be reported as bond-equivalent. For mezzanine bespoke tranches, the top three rows (L10 to O12) should be left empty. The figure for aggregated mezzanine should be reported in cells L13 to O13.

7. Operational risk

1. How should the thresholds specified in panel C of the "Operational risk" worksheet be converted into reporting currency? Should the conversion rate at the mid-2014 reporting date be used for the whole time series?

Answer: No. Banks should use the exchange rate applicable at the end of the relevant fiscal year to determine the thresholds. The exchange rates for a fiscal year should be taken from the data provided by the ECB on the following website:

www.ecb.europa.eu/stats/exchange/eurofxref/html/index.en.html

An archive with daily rates back to January 1999 is provided at:

www.ecb.europa.eu/stats/eurofxref/eurofxref-hist.zip

All amounts reported in the input cells should be reported in the unit and currency specified on the "General info" worksheet (cells C43 and C44).

2. Should positive and negative adjustments of loss events be reported? How?

Answer: In each reporting year, banks should report only positive and negative adjustments of loss events discovered (or accounted for the first time) since 1 January 2004. Adjustments of loss events discovered (or accounted for the first time) within 31 December 2003 should not be reported.

Imagine the following situation, where only three events (events A, B and C) are discovered (or accounted for the first time) within the 2004−2013 time period:

Event A:

- In 2004 a loss event due to litigation is discovered (accounted for the first time). The bank sets a provision of €110,000.

- In 2006, the bank pays legal costs on that event for €50,000.
- In 2008 the original provision is released by €40,000.
- In 2010 the litigation is settled. The bank pays extra costs (not provisioned for in advance) of €12,000

Event B:

- In 2008 a loss event due to internal fraud is discovered (accounted for the first time). The bank sets a provision of €200,000.

Event C:

- In 2008 a loss event due to black out occurs. The bank bears a loss of €15,000.

The banks shall report the loss events according to the schema indicated in the table below.

Event type		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
Whole bank	Number of loss events ≥ EUR 10,000	1				2					
	Number of loss events ≥ EUR 20,000	1				1					
	Number of loss events ≥ EUR 100,000	1				1					
	Number of loss events ≥ EUR 1,000,000										
	Total amount of losses ≥ EUR 10,000	110,000		50,000		175,000		12,000			
	Total amount of losses ≥ EUR 20,000	110,000		50,000		160,000					
	Total amount of losses ≥ EUR 100,000	110,000				160,000					
	Total amount of losses ≥ EUR 1,000,000										

It has to be noted that:

- The rows "Number of loss events" must be filled only in the years when the events are discovered (or accounted for the first time). Therefore these rows do not have to be filled for subsequent positive or negative adjustments.
- In year 2004, besides event A, there are no other loss events greater than or equal to €10,000 or €20,000. Therefore the "Number of loss events" and "Total amount of losses" reported in the lower buckets (ie ≥ €10,000 or ≥ €20,000) must coincide with, respectively, the "Number of loss events" and the "Total amount of losses" reported in the higher buckets (ie ≥ €20,000 or ≥ €100,000). The same holds for the "Total loss amount" in year 2006.
- In year 2008, events B and C are discovered (or accounted for the first time). Since event C amounts to €15,000, it has to be counted only in the row "Number of loss events ≥ €10,000".
- In year 2008, the total loss amount of €215,000 (sum of events B and C) is lowered to €175,000 by the release of provision of €40,000 (event A). The bank shall report this amount only in the row "Total amount of losses ≥ €10,000", since the rows "Total amount of losses ≥ €20,000" and "Total amount of losses ≥ €100,000" by definition exclude event C from the calculation (the amount to be reported in these rows is therefore €160,000 = €200,000 − €40,000).

3. Should the loss data be net of recoveries not due to insurance and other risk mitigants, ie other recoveries such as those obtained by correspondent banks or employees?

Answer. Yes, as long as these recoveries are known and available to the bank. For example, if a loss is caused by a mistake in a financial transaction with a correspondent bank, this loss can be netted of the amount reimbursed by the correspondent bank, as long as this amount is known and available.

4. In case of AMA banks, should the loss data refer to the AMA perimeter only, or also refer to the non-AMA part of the group?

Answer: The loss data to be reported in panels C, D and E should refer also to the non-AMA part of the group. This will permit to create a more robust and unbiased link between these panels and panels A and B, where financial and income statement items have to be reported on a group-wide consolidated basis.