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Secretariat  
Basel Committee on Banking Supervision  
Bank for International Settlements  
CH-4002  
Basel, Switzerland

**Please find the following comments regarding Consultative Documents “Liquidity coverage ratio disclosure standards” by the Basel Committee on Banking Supervision (“BCBS”)**

With regard to paragraph 14 and its related statements, we request you to make the principle of daily observations feasible, allowing banks to calculate the Liquidity Coverage Ratio (LCR) based on quarterly end balances, for the following reasons;

- For banks holding a substantial number of retail accounts, daily observations would cause a significant burden in practice and are deemed to be unrealistic to collect balance data classified by customer attributes on a daily basis. Furthermore, it would force banks to utilize various assumptions in the calculation process which would consequently impair the accuracy of the ratio.
- Since banks have regional characteristics in the liquidity risk profile which reflect peculiarity in financial regulations of each country and each region, a certain degree of national discretion concerning frequency and method of LCR calculation should be permitted.

End