

# SWEDISH SECURITIES DEALERS ASSOCIATION

To  
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## **The SSSA Response to the Public Consultatio Principles for financial market infrastructures.**

The Swedish Securities Dealers Association (SSDA, register id 7777147632-40) represents the common interest of banks and investment firms active on the Swedish securities market. The mission of SSDA is the maintaining of a sound, strong and efficient securities market in Sweden. SSDA promotes members' views with regard to regulatory, market and infrastructure related issues. It also provides a neutral forum for discussing and exchanging views on matters which are of common interest to its members. SSDA has a close cooperation with other trade associations in Sweden, the Nordic area and Europe.


The SSDA welcomes the opportunity to respond to the Consultative report. In general, the SSDA supports the response from the European Banking Federation (EBF). However there are some vies, received lately that SSDA would like to add to the response.

### Principle24: Disclosure of market data, page 98-100

FMI's have a lot of processed information regarding their participants. Such information is as well of value for the individual participant evaluating different kinds of risks. It must be possible for an individual participant to get such information, perhaps even further processed, with the purpose to further calculate and evaluate different kinds of risks relevant to the information that the participant has reported to the FMI. The pricing for such services must be reasonable and not based on the often monopoly like situation.

As a part of evaluating and minimizing different kinds of risks it is as well important to identify different financial instrument. It has now and then been problematic and expensive using identifiers as ISIN. This hinder a proper management of risks in financial instruments. Even the pricing for this information must be reasonable and not based on the often monopoly like situation.

Kind regards



Vigg Troedsson

Senior Vice President