Sosa, Carlos

From:	"BCBScommentupload@bis.org"@lbecs12.bisinfo.org
Sent:	26 March 2016 05:03
To:	"baselcommittee@bis.org"@lbecs12.bisinfo.org
Subject:	Comments submitted for "Standardised Measurement Approach for operational risk - consultative document"

BCBS Comment Upload

Name of institute/individual:	Arpit Mehta, CARE Kalypto Risk Technologies, Mumbai, India
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Consultative document:	Standardised Measurement Approach for operational risk - consultative document(/bcbs/publ/d355.pdf)
Classification:	Public

Comments:

Dear Sir/Madam,

Reference to the captioned consultative paper, we have the following queries: -
1. There is a internal loss multiplier suggested based on internal loss captured. We advise our banks to capture 'Near Miss' 'Potential Loss', 'Gains' also over an above 'Actual Loss' experienced by the bank. Do we have to include these amounts also in calculation of loss component?

2. For banks that does not have high-quality internal loss data history of 5 years, shall they be allowed to use scaled external loss data

3. One of the major problems in banks is to seggeragate gross income across different business lines (e.g. seggeragating branch NII into 8 basel business lines at branch level). Can more objectivity be brought into this area of expert judgements?

Warm Regards
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