Dear Sirs/Madams,

Subject: Comments on BCBS Consultative Document

With reference to BCBS Consultative Document "Net Stable Funding Ratio disclosure standards" issued in December 2014, the Bank of Thailand agrees with BCBS's objectives to improve transparency of regulatory funding requirements, reinforce the sound principles, and strengthen market discipline by requiring information disclosure. However, as NSFR concept is quite new for Thai banks and market participants; thus, we would like to share our opinion to ensure effectiveness of such disclosure as follow.

First, BCBS should allow sufficient time before requiring banks to comply with NSFR disclosure requirements, e.g. 1 year after the implementation of NSFR minimum requirements, to ensure that banks have equipped themselves with sufficient liquidity risk management.

Second, because of the different of national discretion; therefore, the NSFR disclosure should cover only weighted value of major items, e.g. total amount of capital, retail deposits and deposits from small business customers, wholesale funding for ASF items and total amount of HQLA, deposits held at other financial institutions for operational purposes, performing loans and securities, off-balance sheet items for RSF items.

Third, public understanding on NSFR disclosure is also important; thus, communication by regulators and supervisors could prevent unintended instability in the system.

Lastly, BCBS should consider interaction between NSFR disclosure and other regulatory disclosure e.g. leverage ratio as well as IASB's disclosure, in order to develop a coherent, manageable and efficient overall package of disclosure.

With best regards,