From:	"BCBScommentupload@bis.org"@lbecs11.bisinfo.org
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Subject:	Comments submitted for "Interest rate risk in the banking book - consultative document"
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BCBS Comment Upload

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Consultative document:	Interest rate risk in the banking book - consultative document(/bcbs/publ/d319.pdf)
Classification:	Public

Comments:

Appreciate the opportunity to comment on the framework for interest rate risk management on the banking book; My comment is related to the interest rate exposures related to pension and medical expenses managed by many banks, these exposures are subject to a large interest rate exposure that sometimes larger in terms of earnings or economic value that those of the financial institutions.

Should these exposures be considered part of the exposure in the banking book, and if this is the case derivatives instruments used to hedge under liability driven investments framework should be treated under the same control framework than those of the operating exposures of the banking book?. The same treatment should be applied to hedging of equity or credit risk as well:

Appreciate if these clarifications are incorporated on the next version of the document