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October 21, 2015

To the Basel Committee on Banking Supervision

Japanese Bankers Association

Comments on the Consultative Document "*General guide to account opening*"

We, the Japanese Bankers Association, would like to express our gratitude for this opportunity to comment on the Consultative Document "General guide to account opening" published by the Basel Committee on Banking Supervision ("BCBS") on July 16, 2015.

We respectfully expect that the following comments will contribute in any way to your future discussions on this issue.

1. "III. Natural persons"

(1) Paragraphs 13 and 14

We would like to confirm whether firms have discretion on determining whether to collect items listed in the "potential additional information (on the basis of risks)" on a risk basis. If our understanding is correct, please specify this in the general guide.

(2) Paragraph 17

If there are some potential "appropriate measures" for "additional sources of information and enhanced verification procedures", please provide specific examples.

2. "IV. Legal persons and arrangements and beneficial ownership"

(1) Paragraphs 22, 23, 29 and 30

We would like to confirm whether firms have discretion on determining whether to collect items listed in the "potential additional information (on the basis of risks)" on a risk basis. If our understanding is correct, please specify this in the general guide.