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开泰银行 KASIKORNBANK

KASIKORNTHAI

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Secretariat of the Basel Committee on Banking Supervision,

Bank for International Settlements,

CH-4002 Basel,

Switzerland

e-mail : baselcommittee@bis.org

Dear Sir,

We, Kasikornbank PCL, appreciated the opportunity to comments on the BCBS consultative documents "Pillar 3 disclosure requirements – consolidated and enhanced framework". We would like to comment on the consultative document as follows:

Template PV1 Prudent Valuation Adjustments

Valuation adjustments are normally computed at a portfolio level rather than a transaction level; therefore, it would not be meaningful to break down valuation adjustments into each type of financial instruments (column a to e). Investing and funding costs, and unearned credit spreads (column f and g) shall be interpreted as types of valuation adjustments. It may be more appropriate to place them as rows rather than columns.

Template LIQ1 - Liquidity Coverage Ratio (simple consolidation without change)

Calculating daily LCR requires lots of effort on data gathering and computation facilities. Not all reported items are available on a daily basis with full accuracy. Due to the limitation of data and operational burden, reported amount that is simple averages of daily observations over the previous quarter may not be appropriate for disclosure. We propose using simple averages of monthly data over the previous quarter instead.

Template MR1- Market risk under standardized approach

Given that each country's supervisor has approved the deviation from the presumptive list for a bank, disclosure on the positions of trading or banking book in contradiction of the general presumptions may not be necessary and may introduce confusion to the public.

Interest rate risk in the banking book

The method used to calculate the quantitative information on Table A should not be either daily or monthly average or as of the reporting date at the discretion of the bank. It should be specified clearly by supervisory authority in order to have the comparable results among banks. Moreover, the daily average data would cause an operational burden to banks. Therefore, the disclosure data should be either monthly average of the year or on the data as of the reporting date, clearly specified by supervisory authority.

Thank you for your kind consideration. We would appreciate if our comments are incorporated in the final Pillar 3 disclosure requirements – consolidated and enhanced framework.

Please do not hesitate to contact Miss Thipvadee Sindhuseka, Integrated Risk Management and Analytics Department via E-mail: BaselTeam@kasikornbank.com for futher clarification regarding the comment above.