

13 February 2013

Norah Barger
Alan Adkins
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Basel Committee on Banking Supervision
Bank for International Settlements
Centralbahnplatz 2, CH-4002 Basel, SWITZERLAND

Sent by email to: baselcommittee@bis.org

Consultative Document: Fundamental review of the trading book¹- further response

Dear Ms. Barger and Mr. Adkins,

This letter contains a further response of the International Swaps and Derivatives Association, Inc² (“ISDA”), the Global Financial Markets Association³ (“GFMA”) and the Institute of International Finance⁴ (together “the Associations”), to the Basel Committee on Banking Supervision (“BCBS”) Consultative Document *Fundamental Review of the Trading Book* dated May 2012 (“Fundamental Review” or “FTRB”). This paper should be read in the context of the previous industry response submitted in September 2012.

The Associations very much appreciate the opportunity to comment further on the Fundamental Review and to meet with the BCBS Trading Book Group (“TBG”) in Washington in June 2012 and in Frankfurt in August 2012 and in other bilateral meetings. We found those meetings to be constructive

¹ Basel Committee on Banking Supervision, May 2012

² Since 1985, ISDA has worked to make the global over-the-counter (OTC) derivatives markets safer and more efficient. Today, ISDA is one of the world’s largest global financial trade associations, with over 840 member institutions from 59 countries on six continents. These members include a broad range of OTC derivatives market participants: global, international and regional banks, asset managers, energy and commodities firms, government and supranational entities, insurers and diversified financial institutions, corporations, law firms, exchanges, clearinghouses and other service providers. Information about ISDA and its activities is available on the Association’s web site: www.isda.org.

³ The Global Financial Markets Association (GFMA) brings together three of the world’s leading financial trade associations to address the increasingly important global regulatory agenda and to promote coordinated advocacy efforts. The Association for Financial Markets in Europe (AFME) in London and Brussels, the Asia Securities Industry & Financial Markets Association (ASIFMA) in Hong Kong and the Securities Industry and Financial Markets Association (SIFMA) in New York and Washington are, respectively, the European, Asian and North American members of GFMA. For more information, please visit <http://www.gfma.org>.

⁴ The Institute of International Finance, Inc. (IIF) is a global association created in 1983 in response to the international debt crisis. The IIF has evolved to meet the changing needs of the international financial community. The IIF’s purpose is to support the financial industry in prudently managing risks, including sovereign risk; in disseminating sound practices and standards; and in advocating regulatory, financial, and economic policies in the broad interest of members and foster global financial stability. Members include the world’s largest commercial banks and investment banks, as well as a growing number of insurance companies and investment management firms. Among the IIF’s Associate members are multinational corporations, consultancies and law firms, trading companies, export credit agencies, and multilateral agencies. All of the major markets are represented and participation from the leading financial institutions in emerging market countries is also increasing steadily. Today the IIF has more than 450 members headquartered in more than 70 countries.

and assisted the industry to formulate its responses in a focused way. This paper further examines the issues of model approval and diversification and will form part of a set of papers following up on the Associations' September 2012 response to the FRTB.

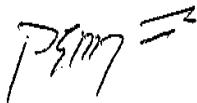
One key goal of the FRTB is to develop a coherent set of regulations to replace the package of measures known as Basel 2.5 together with its patchwork of measures (such as stressed VaR, the Incremental Risk Charge (IRC), the Comprehensive Risk Measure etc) with a single coherent framework. This paper addresses the issues of diversification and model approval but does so in a way which has wider application in the development of a single coherent measure of risk.

Specifically we hope that the concepts set out in this paper will assist the Committee in achieving their aims of having a more granular model approval framework, and improving the relationship between standardised and internal models-based approaches.

Finally, given the capital penalties proposed here (diversification and standard rules fraction), there could be an overall increase in the level of regulatory capital, all else being equal. As has already been recognized, consistency of implementation is of key importance. Because of these issues, we look forward to working with the TBG on any future QIS to establish the combined impact of all FRTB proposals and enable careful calibration of the new framework.

We wish to stress that we are very broadly in agreement with the direction of the FRTB and feel that the points set out in this paper complement the FRTB and better calibrate the proposals. We would welcome the opportunity to discuss with you further the issues set out in this paper and value any other areas where feel our input would be helpful.

Yours faithfully,



Peter Sime
Head of Risk and Capital
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Simon Lewis
CEO
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Andrés Portilla
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cc: Wayne Byres, Secretary General, Basel Committee on Banking Supervision