



FEDERATION  
BANCAIRE  
FRANCAISE

*Banking supervision  
And Accounting issues Unit  
The Director*

Paris, August 14<sup>th</sup> 2013

**French Banking Federation comments on the European Banking Authority's  
Consultation on Additional Liquidity Monitoring Metrics (CP/2013/18)**

Dear Madam,

The French Banking Federation (FBF) represents the interests of the banking industry in France. Its membership is composed of all credit institutions authorized as banks and doing business in France, i.e. more than 390 commercial, cooperative and mutual banks. FBF member banks have more than 38,000 permanent branches in France. They employ 370,000 people in France and around the world, and service 48 million customers.

FBF welcomes the opportunity to comment on the EBA consultation paper related to the draft implementing technical standards on additional liquidity monitoring metrics under Article 403(2) of the draft Capital Requirements Regulation (CRR).

We feel that the amount of new information to be reported is burdensome and that the reporting templates are complex. They will generate significant additional costs without necessarily creating much added value for bank supervision. That is why, we ask EBA to rely on the existing reports already provided by the institutions and propose adjustments where deemed necessary based on the analysis of the existing reports.

Moreover, it would be valuable to adopt a more progressive approach, and introduce additional reports to the extent they are needed and when they are needed. For reports selected by EBA, it would be efficient to phase in the scope of application of the reports on additional liquidity metrics: firstly on a consolidated level, then, if it makes sense, for the most significant entities in the Group. A minimal time period between the publication of the final templates of a reporting and the beginning of the reporting of at least one year will be appreciated.

**Ms Isabelle VAILLANT  
European Banking Authority  
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London EC2N 1HQ  
United Kingdom**

You will find in the appendix attached our answers and comments to the questions raised in the consultation paper.

We thank for your consideration and remain at your disposal for any question or additional information you might have.

Yours sincerely,

P.O 

Jean-Paul Caudal