Consultation paper on Draft Regulatory Technical Standards on the concept of Gain on Sale associated with future margin income in a securitization context (EBA/CP/2012/07)

The Division Bank and Insurance of the Austrian Federal Economic Chamber, as representative of the entire Austrian banking industry, appreciates the possibility to comment on "EBA Consultation Paper on Draft Regulatory Technical Standards on the concept of Gain on Sale associated with future margin income in a securitization context (EBA/CP/2012/07)" and would like to submit the following short comment.

In general we would like to state that we have no major concerns in regard to the proposed RTS. Moreover we would like to submit the following short annotation. Given that future margin income is future excess spread, which is not a fixed size rather it depends on the performance of the collaterals and interest like Euribor, we are in line with the RTS that the expected gain on sale in connection with this income with a securitization must not be accounted as own equity.

Yours sincerely,

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