

January 11, 2013

Sent by email to: EBA-DP-2012-03@eba.europa.eu

European Banking Authority
Tower 42
25 Old Broad Street
London EC2N 1HQ

Dear Sir or Madam,

Re: Discussion Paper on “Draft Regulatory Technical Standards on prudent valuation under Article 100 of the draft Capital Requirements Regulation (CRR)” (EBA/DP/2012/03)

This letter contains the response of the International Swaps and Derivatives Association, Inc. (“ISDA”), the Association for Financial Markets in Europe (“AFME”) and The British Banker’s Association (“BBA”) to the European Banking Authority’s (“EBA”) Discussion Paper on “Draft Regulatory Technical Standards on prudent valuation under Article 100 of the draft Capital Requirements Regulation (“CRR”)” of November 2012.

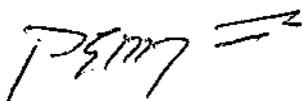
ISDA’s mission is to foster safe and efficient derivatives markets to facilitate effective risk management for all users of derivative products. ISDA has more than 800 members from 58 countries on six continents. These members include a broad range of OTC derivatives market participants: global, international 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. For more information, visit www.isda.org.

AFME represents a broad array of European and global participants in the wholesale financial markets. Its members comprise pan-EU and global banks as well as key regional banks, brokers, law firms, investors and other financial market participants. AFME participates in a global alliance with the Securities Industry and Financial Markets Association (SIFMA) in the US, and the Asia Securities Industry and Financial Markets Association (ASIFMA) through the GFMA (Global Financial Markets Association). AFME is listed on the EU Register of Interest Representatives, registration number 65110063986-76. For more information, visit www.afme.eu.

The British Banker’s Association (BBA) is the leading association for UK banking and financial services representing members on the full range of UK and international banking issues. It represents over 200 banking members active in the UK, which are headquartered in 50 countries and have operations in 180 countries worldwide. All the major banking groups in the UK are members of our association as are large international EU banks, US and Canadian banks operating in the UK as well as a range of other banks from Asia, including China, the Middle East, Africa and South America. The integrated nature of banking means that our members are engaged in activities ranging widely across the financial spectrum from deposit taking and other more conventional forms of retail and commercial banking to products and services as diverse as trade and project finance, primary and secondary securities trading, insurance, investment banking and wealth management. Members include banks headquartered in the UK, as well as UK subsidiaries and branches of foreign banks. Visit www.bba.org.uk.

We look forward to working with the EBA to develop an approach that will ensure consistent and prudent valuations across the Industry.

Yours faithfully,



Peter Sime
Head of Risk & Research
ISDA



Michael Percival
Director, Prudential Regulation
AFME



Robert Driver
Policy Advisor
British Bankers' Association