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Frequently Asked Questions

DORA 2024 Dry Run exercise on reporting of registers of information

This document provides answers to the frequently asked questions about the ESAs 2024 DORA Dry Run exercise on reporting of the registers of information of contractual arrangements with the ICT third-party providers. The answers focus on the questions regarding the practical nature of the reporting exercise, including filling the templates, preparation of the reporting files, their submission and use of the tools for the dry run provided by the ESAs.

The FAQ document <u>does not</u> provide responses to the questions regarding the interpretation of the relevant legal acts related to the registers of information, including the provisions of DORA and Final report on the draft Implementing Technical Standards on the registers of information – such questions are to be addressed through a formal Questions and Answers process established by the ESAs for handling the questions of such nature.

The FAQ document was first published on 31 May and then has been thoroughly updated on 4 July based on the questions received from the financial entities and competent authorities since then. The current version includes changes to Questions 74 and 75.

The answers to the questions are provided on 'best efforts' basis by the ESAs staff for the purposes of the dry run exercise and therefore do not represent any legal interpretation or guidance agreed with the competent authorities, nor they represent official stance of the ESAs.

It is also noted that the dry run exercise is based on the Final Report on draft Implementing Technical Standards on registers of information developed by the ESAs as sent to the EU Commission for endorsement in January 2024. The steady-state reporting will be done on the basis of the ITS as adopted by the EU Commission that may change compared to the current version.

##	Category	Question	Answer
1	Use of collected information	Will the information collected in the dry run exercise be used for the designation of critical ICT third-party service providers (CTPPs)? When will the first list of CTPPs will be available?	The ESAs will use the information collected in the dry run to analyse the data quality of the submissions and provide feedback to the financial entities on the data quality issues. The ESAs will also identify common issues regarding data quality that will be summarised in the public report. The information collected will not be used for the purposes of CTPP designation. First designation of CTPPs that will be made only after DORA becomes applicable in 2025, and will be based on the information collected through reporting of registers of information. The ESAs may, however, use the information collected in the dry run in testing own processes and methodologies for the CTPP designation.
2	Use of collected information	Who is in charge of the designation of Critical third-party providers (CTPPs)? Only the ESAs, or do financial entities also have to identify who are their critical third-party providers?	In accordance with the DORA requirements, the ESAs will determine the critical ICT third-party providers based on the information collected from the registers of information provided by the financial entities and by applying criticality criteria set out in DORA and further specified in the dedicated Commission Regulation on criticality criteria.

##	Category	Question	Answer
			To note, there is also a criticality assessment to be performed by the financial entities, which relates to the identification of their critical or important functions, as this will entail additional requirements (e.g. Article 30(3)).
3	Use of collected information	Do ESAs plan to provide public database of all ICT third party providers, their subsidiaries and parents?	No. The ESAs do not plan nor have mandate to provide such database.
4	Feedback from dry run	Will there be any feedback anonymised/generalised made available regarding ICT third-party providers, e.g. regarding what of their services are considered as critical or important	Given the preparatory and voluntary nature of the dry run exercise, including the possibility for the financial entities to provide partial information, the ESAs will not draw any public conclusions from the information received apart from the data quality observations. No feedback will be provided to the ICT third-party providers based on the dry run exercise.
5	Feedback from dry run	Will the ESAs provide feedback regarding financial entities internal processes?	The feedback from the ESAs will focus on the data quality aspects of the submitted registers of information. In general, relevant competent authorities may provide feedback regarding entities' internal process as part of their supervisory engagement with the entities. The provision of such a feedback is, however, outside the scope of the dry run exercise.
6	Feedback from dry run	Will the feedback be provided to each entity individually, or it will be collective response with no direct feedback on the submitted register?	The feedback will be provided to the submitter of the register (through the competent authority) and will cover data quality aspects in relation to the submitted register. This feedback will therefore cover all the entities in the scope of the submitted register. In

##	Category	Question	Answer
			addition, the ESA will draw general conclusions on the data quality aspects to be published in an aggregated form.
7	Participation in dry run	Does a financial entity need to register its participation with the ESAs?	There is no need to register for the participation in the dry run with the ESAs, as the ESAs are able to accept files from all financial entities during the defined reporting window. However, as the reporting is done through the relevant competent authorities, it is important that the financial entities wishing to submit their registers agree their participation with the competent authorities, as otherwise they will not be able to submit files or receive feedback from the ESAs.
8	Participation in dry run	Can a financial entity unilaterally decide to participate in the dry run, or consent form the competent authority is needed?	Financial entities cannot participate in the dry run on their own without the consent from the relevant competent authority. This is because of the reporting flows to the ESAs, as the reporting is done through the relevant competent authorities, it is important that the financial entities wishing to submit their registers agree their participation with the competent authorities, as otherwise they will not be able to submit files or receive feedback from the ESAs.
9	Participation in dry run	Is there any limitation on the number of participating financial entities?	No. The ESAs are not imposing any limitations on the participation and will process all files received. However, some competent authorities may introduce some restrictions to manage their own workload in the exercise.

##	Category	Question	Answer
10	Participation in dry run	What is the average workload that financial entities need to plan if they want to participate to the dry run?	The workload depended on many factors, including types and size of an entity, number of ICT third-party service providers, numbers of contracts with them, number of ICT services offered, state of readiness of the register of information etc.
11	Participation in dry run	For a group of financial entities, is it necessary to register all the legal entities or the entity in charge of the reporting (e.g. the parent company) can be the single registered one?	The participation of the groups of financial entities in the dry run follows the same approach established as for the steady-state reporting. So, if the group of financial entities participates in the dry run on the consolidated basis, it is sufficient for the entity in charge of the reporting (e.g. the parent entity) to agree on its participation with the relevant competent authority, and then the register will be submitted on the consolidated basis. See also questions regarding group reporting/consolidation.
12	Participation in dry run	Where the parent undertaking decides not to participate in the dry run on the consolidated level, will individual entities be able to participate?	Although for reporting of the groups of financial entities in the dry run follows the same approach established as for the steady-state reporting (see questions on the group reporting/consolidation), solely for the purposes of the dry run exercise the participation of individual financial entities in the case the group/parent does not participate is accepted. These exceptions will need to be agreed with the relevant competent authorities for them to be able also to collect the registers form such entities and provide them to the ESAs.
13	Participation in dry run	Can financial entities from the EEA countries participate in the dry run?	Financial entities from EEA countries (Norway, Iceland, Liechtenstein) can participate in the dry run exercise provided that their competent authorities have agreed to such participation and have been onboarded to the ESAs reporting solution.

##	Category	Question	Answer
14	Participation in dry run	Can financial entities that are still collecting necessary information for their registers of information participate with partial registers with some sample of contracts?	The dry run is a preparatory exercise aimed also at stimulated financial entities to build the registers in accordance with the applicable requirements. To this end financial entities may participate in the dry run with incomplete or partial registers. They, are nevertheless, encouraged to provide as many data points as possible for the contracts they report in order to fully benefit from the data quality feedback to be provided by the ESAs at the end of the exercise.
15	Timelines / Deadlines	Will there be specific deadlines for reporting to the competent authorities, and when they will be made available?	The ESAs will be able to receive files in a time window from 1 July to 31 August. As the reporting is done through the relevant competent authorities, they may set up specific deadlines within this time window to facilitate their own internal processes. Competent authorities will communicate such deadlines, where relevant, to the participating financial entities in their jurisdictions. The ESAs do not maintain a record of such individual deadlines.
16	Reference date	Is there a specific reference date set for the dry run exercise? What is the period of observations to be included in the reporting in the dry run?	The reference day for the dry run exercise is technically set 31/12/2023, however we are not strongly enforcing this reference date given the exercise is run on 'best efforts' basis with financial entities reporting contracts valid at the moment of the preparation of the data prior to the reporting in July -August this year.
17	Reporting channels	To whom should the financial entities send their registers of information, to the ESAs or to the competent authorities?	Both for the dry run and steady-state reporting, the financial entities will need to provide their registers to their competent authorities and those would submit them to the ESAs.

##	Category	Question	Answer
			Specific channels for reporting to the competent authorities will be specified by the competent authorities both for the dry run and for the steady-state reporting.
18	Reporting channels	Can a financial entity use the existing reporting channels that they have established with the CAs, e.g. for submission of outsourcing registers?	The relevant competent authorities that will be collecting registers form the financial entities will inform the financial entities about the use of reporting channels to collect the registers. The ESAs are setting up the reporting channels between the competent authorities and the ESAs.
19	Reporting channels	Do ESAs plan to use some test platform to test the quality of the report before the submission?	The dry run exercise is considered to be a test for the solution to be used for the steady-state. Therefore, no specific additional testing is planned.
20	Role of the competent authorities	What is the role for the competent authorities in the dry run?	Competent authorities act as a gateway and communication channel between the financial entities and the ESAs in the contact of the dry run. The financial entities will need to provide their registers to their competent authorities and those would submit them to the ESAs. Contrary to the steady-state reporting, in the context of the dry run, competent authorities are not expected to perform any quality assurance work on the registers received from the financial entities and will pass the received files directly to the ESAs.
21	Role of the competent authorities	What is the relevant competent authority for a specific financial entity, and what if there are several of them?	The competences of the competent authorities and appointment of the competent authorities for DORA purposes, including the collection of registers of information, depend on the type of financial entity and it is done in accordance with Article 46 of DORA.

##	Category	Question	Answer
22	Steady-state reporting	Would the financial entities be expected to report full registers of information in steady-state reporting, what will be the deadlines and frequency?	For the steady-state reporting, financial entities will be expected to report their complete registers of information on annual basis for the purposes of the CTPP designation. This reporting will through the competent authorities, who will in turn provide the registers to the ESAs for the purposes of CTPP designation. In accordance with the DORA requirements and supervisory needs of the competent authorities, the competent authorities may require access to the registers of information for the financial entities under their supervision outside of such annual reporting calendar. At this stage the ESA cannot yet provide the definite timeline for the round of steady-state reporting of the registers of information. The timeline for the first reporting also depends on the timeline for the adoption by the EU Commission and the publication in the EU Official Journal of the Implementing Regulation on the registers of information. The ESAs are going to issue a decision outlining the modalities of such annual reporting to the ESAs, including its timelines (reference dates and remittance dates). Technical means and formats of such reporting are expected to be as close as possible to the dry run.
23	Steady-state reporting	Do financial entities need to submit register each time information is changed in relation to the registration of ICT Service Provider information or is the register sent just once a year?	Financial entities are required to keep their registers of information up to date, which means that all new contracts or changes to existing contracts will need to be recorded on the ongoing basis. In accordance with the DORA requirements and supervisory needs of the competent authorities, the competent authorities may require access to the registers of information for the financial entities under their supervision at any time. Financial entities

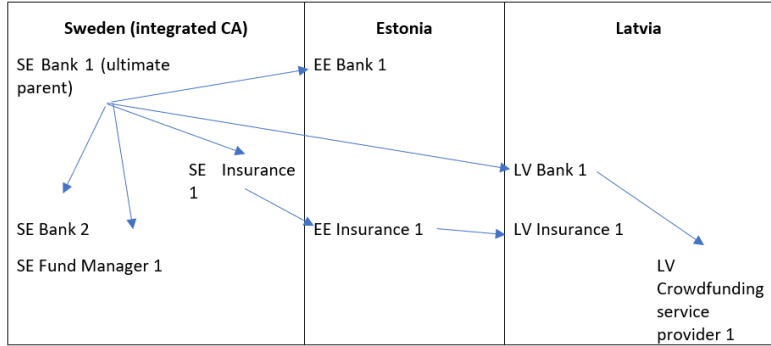| ##	Category	Question	Answer
			will be expected to report their complete registers of information on annual basis for the purposes of the CTPP designation.
24	Steady-state reporting	Will the ESAs maintain the tools used for the dry run also for the purposes of the steady-state reporting?	The tools are provided solely for the purposes of the dry run, as (1) they are based on the final report of the draft ITS on the registers of information, which is not the final version of the legislative act adopted by the EU commission, and they are (2) based on the draft data point model, which is being finalised in parallel with the dry run exercise. The final data point model and technical specifications will be made available to the competent authorities and financial entities to set up reporting solutions to facilitate the steady-state reporting without relying on the ad hoc tools provided for the dry run. To this end, the ESAs do not plan to update and maintain the .CSV conversion tool for the steady-state reporting.
25	Steady-state reporting	What if there are some missing data points in the registers in steady-state? Would the same treatment apply as in the dry run?	The treatment of missing data points in the formal reporting will be different to the dry run, where financial entities are allowed to report registers with missing data points. In the steady-state reporting, all mandatory data fields will need to be provided in order for the report to be accepted. Missing data points will be flagged as data quality issue requiring resubmission.
26	Steady-state reporting	How is it possible for the competent authorities to be sure that the financial entities in steady-state reporting use and report the right files, not the ones built for the exercise?	Reporting files submitted in steady-state reporting, should meet the requirements of the final reporting package (data point model, taxonomies, validation rules, where relevant) and the filing instructions. If the files do not meet the requirements, they may be rejected as part of data quality checks and the financial entities will be required to resubmit the data.

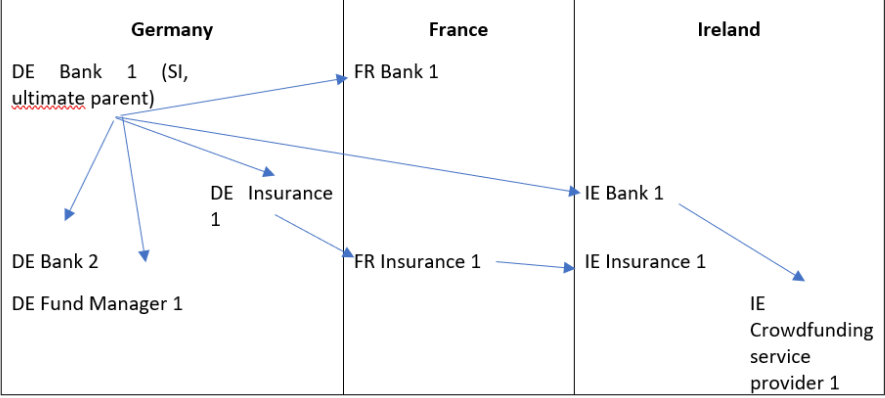| ##	Category	Question	Answer
			Whilst the ESAs try to ensure maximum consistency between the tools used for the dry run and the steady-state reporting, as the tools for the dry run are built on the draft requirements, there may be changes to the final requirements.
27	Technical formats for reporting	What format will be required to provide registers of information?	The registers of information are to be reported in plain-csv format according to the specification provided by the ESAs. The same technical format will be used for the dry run and stead-state reporting.
28	Technical formats for reporting	Will the "simplified .csv" format be used also for the steady-state reporting? Or will it be replaced by XBRL format?	Yes. The plain-csv format used for the dry run will be also maintained for the steady-state reporting.
29	Technical formats for reporting	How can financial entities generate reporting files in the specified format? Is any special software needed?	Financial entities can generate the required reporting files .csv and .zip files for the submission of the registers of information either directly from their systems containing the registers of information (according to the specification of the technical files and filing rules provided) or by using the VBA-based conversion tool provided by the ESAs solely for the purposes of the dry run.
30	Technical formats for reporting	Do financial entities just have to fill out the excel and then excel can be converted in a CSV (by the CA or ESA) or do financial entities need to create a CSV as well?	ESAs do not specify who should be converting excel files into csv files. This conversion can be done by the financial entity or any third party, or even by the CA, provided financial entities have reached such agreement with the CAs.

##	Category	Question	Answer
31	Technical formats for reporting	For the zipped final report, with the length of the required file name being so long, will there be issues with organisations that have only 256 character length path names?	Should the limitation of the character length of the file names be an issue, the ESAs recommend working on directories with short path names.
32	Templates for the register of information	Should financial entities use templates in Excel provided by the ESAs or can have registers in other systems?	The ESAs do not prescribe any formats or technical solutions for the actual keeping of the registers by the financial entities. The technical specifications affect only reporting of the registers to the ESAs through the competent authorities.
33	Templates for the register of information	If Microsoft Access (or similar software) is used to keep the register of information database would it be possible for a financial entity to generate CSVs themselves, and will these CSVs be accepted?	The ESAs do not prescribe any specific tools for keeping the registers of information, financial entities can use any tools or databases they see best fitting their needs provided the tools meet the requirements in terms of the content of the registers as set out in the ITS on the registers of information and, when it comes to reporting, have a possibility to generate reporting files in accordance with the specifications set by the ESAs and the competent authorities for the reporting of the registers of information.
34	Templates for the register of information	How are the templates for the dry run different from the templates published by the ESAs in January 2024 together with the Final report on the draft ITS on RoI?	Together with the publication of the Final Report on the draft ITS on the registers of information in January 2024, the ESAs published illustrative templates in Excel providing visual representation of the requirements set out in the Final Report. These templates were meant for illustrative purposes and shall not be used to report the data during the dry run exercise.

##	Category	Question	Answer
			The templates provided for the dry run, whilst still based on the same final report published in January, provide more accurate representation of the requirements from the data modelling perspective that should facilitate the reporting of the registers.
35	Templates for the register of information	Will the ESAs provide some examples of how to populate the templates?	Yes. Materials published on 31 May (here) also include examples of how to fill in the register templates.
36	Filling the templates: use of identifiers	What identifier should be reported if the LEI for the ICT third-party provider is not available?	In case the LEI is not available for the ICT third-party provider (or its ultimate parent undertakings) in the dry run exercise in accordance with the Final Report on the draft ITS on RoI, financial entities can use corporate registration number, VAT number, passport number or national identity number in the following format: *'Country Code'+Underscore+'Type of Code'*. Please refer to the instructions to the RoI template RT.02.02 (B.02.02) Please note that this treatment applies only to dry run exercise.
37	Filling the templates: use of identifiers	How do ESAs intend to aggregate the ICT TPP provided in the different RoI when the LEI is not available for all of them? Which database are the ESAs using to look up the LEI?	When filling the register, financial entities are also required to provide identification of the ultimate parent undertaking for the ICT TPP – data field b_05.01.0080. This identifier will be used in the analysis to group all relevant TPPs belonging to the same group. Therefore, it is important to ensure that such identifier is provided in the submission.

##	Category	Question	Answer
			Where, possible and depending on the identifier provided in this data field, the ESAs will use the reference data to check the information, e.g. GLEIF database for LEI codes.
38	Use of identifiers	How is the contractual arrangement reference number determined?	Contractual arrangement reference number is chosen by the FE. The FE should ensure the consistency of this identifier, especially its uniqueness throughout the RoI when part of a group to avoid confusion with other contractual arrangements.
39	Data protection	What do the ESAs have to protect the information reported to them?	For the purposes of the dry run (and steady state reporting) the ESAs use similar infrastructure used currently for collection of prudential reporting. From the design perspective, it is assumed that the security classification of the data to be contained in the registers of information and, therefore, handled by the ESAs is up to and including 'EU SNC' (Sensitive Non-Classified) level.
40	Data protection	Is the dry run exercise anonymous?	No. The ESAs expect participating entities to report actual information. Reporting fictitious data has no benefit from the point of view of preparations or data analysis/data quality feedback.
41	Reporting group registers/ consolidation	According to DORA, the registers shall be kept at individual, sub-consolidated and consolidated level. How will this be reflected in the reporting to the ESAs?	Whilst the competent authorities exercising their supervisory powers in accordance with DORA may request financial entities to provide registers at individual, sub-consolidated and consolidated level, for the purposes of reporting to the ESAs (both in steady state and in dry run) the following applies: Registers should be reported at:

##	Category	Question	Answer
			• at individual entity level, where financial entities are not part of a group of financial entities (stand-alone financial entities); • at individual entity level, where financial entities are part of a group of financial entities, and where the parent undertaking is an entity outside of the Union and there is no EU parent undertaking; • at the highest level of consolidation in the EU for groups of financial entities that is available to the competent authorities in accordance with their supervisory responsibilities under the legal acts referred to in Article 46 of DORA.
42	Reporting group registers/ consolidation	How to report to the ESAs registers for the groups of financial entities that span across different sectors and different Member States?	The following data flows for the registers of groups of financial entities are assumed considering the scope of the responsibilities of various competent authorities under Article 46 of DORA: • integrated competent authorities that are fully responsible for the supervision of all financial entities belonging to the same group (DORA group) report to the ESAs one complete RoI for the whole DORA group; • sectoral competent authorities report to the ESAs aggregated/consolidated RoI for the entities under their supervisory remit at the highest EU level of consolidation with respect to DORA Groups available to them (e.g. highest prudential consolidation of a banking or insurance group). In case the prudential scope of consolidation would encompass entities from another financial sector (e.g. a fund

##	Category	Question	Answer
			manager in an insurance group), the register of information of this entity would be encompassed in the consolidated/sub-consolidated RoI of the group, so reported to the ESAs by the competent authority in charge of consolidated/sub-consolidated RoI, and would not be reported individually.

- sectoral competent authorities report to the ESAs individual or sub-consolidated RoI for the entities of the group, where parent undertaking is not subject to DORA requirements, or is outside of their supervisory remit.

Example 1. Cross-border cross-sectoral group (DORA Group), where the prudential consolidating supervisor is an integrated CA

- SE CA being an integrated supervisor will provide to the EBA one consolidated/aggregate RoI requested from the SE Bank 1 as ultimate parent undertaking covering all FE entities of the DORA groups.

##	Category	Question	Answer

Example 2. Cross-border cross-sectoral group (DORA Group), which is headed by the SSM Significant Institution (SI)

Germany	France	Ireland
DE Bank 1 (SI, ultimate parent)	FR Bank 1	
	DE Insurance 1	IE Bank 1
DE Bank 2	FR Insurance 1	IE Insurance 1
DE Fund Manager 1		IE Crowdfunding service provider 1

- ECB being a prudential supervisors of SI will provide to the ESAs group RoI from DE Bank 1 covering the prudential scope of consolidation, including DE Bank 2, FR Bank 1 and IE Bank 1. (DE Fund Manager 1 and IE Crowdfunding service provider 1 can be included, if they are included into the prudential scope of consolidation DE Bank 1 protection group)

- DE CA responsible for supervision of insurance, will provide to the ESAs consolidated RoI collected form from DE Insurance 1 covering the insurance prudential group including FR Insurance 1 and IE insurance 1.

- DE CA responsible for the supervision of DE Fund Manager 1 will provide to the ESAs individual RoI (in case that FE is not included into the prudential scope of consolidation of DE Bank 1 group)

- IE CA responsible for the supervision of IE Crowdfunding service provider will provide to the ESAs individual RoI (in case that FE is not included into the prudential scope of consolidation of IE Bank 1 group and equally DE Bank 1 group)

Example 3. Cross-border cross-sectoral group (DORA Group) with multiple non-integrated CAs

- IT CA responsible for supervision of IT Bank 1 will provide to the ESAs group RoI from IT Bank 1 covering the prudential scope of consolidation, including IT Bank 2, FR Bank 1 and IE Bank 1. (IT Issuer of ART 1, IT Fund Manager 1 and IE Crowdfunding service provider 1 can be included, if they are included into the prudential scope of consolidation, IT Bank 1 banking group)

##	Category	Question	Answer
			• IT CA responsible for supervision of insurance, will provide to the ESAs consolidated RoI covering insurance prudential group IT Insurance 1 including FR Insurance 1 and IE insurance 1. • IT CA responsible for the supervision of issuers of asset-reference tokens will provide to the EBA individual RoI for IT Issuer of ART 1 in case that FE is not included into the prudential scope of consolidation of IT Bank 1 group and equally IT Bank 1 group) • IT CA responsible for the supervision of fund managers will provide to the ESAs consolidated register for IT Fund manager 1 covering also FR Fund Manager 1, FR Fund Manager 2 and Fund Manager 3 (in case that FE is not included into the prudential scope of consolidation of IT Bank 1 group) • IE CA responsible for the supervision of IE Crowdfunding service provider will provide to the ESA individual RoI (in case that FE is not included into the prudential scope of consolidation of IE Bank 1 group and equally IT Bank 1 group)
43	Reporting group registers/ consolidation	A Group composed of both Insurance companies and banking companies with parent company subject to Insurance Supervision: Does the RoI need to be transmitted to the national CA at the highest level of consolidation and are controlled banking companies not required to send individual RoI to their CA?	Reporting obligations for the register of information largely follow the same logic as the supervisory responsibilities of the competent authorities under DORA. To this end, in case where the ultimate parent undertaken is subject to the supervision only by the sectoral supervisor in this example only with the responsibilities for the supervision of insurance undertaking and not credit institutions, then the financial entity will send a register containing the insurance group to that competent authority and then the part of the banking group to the competent authority responsible for the supervision of credit institutions. Where the competent authority is the same (integrated competent authority

##	Category	Question	Answer
			(e.g. like *Finansinspektionen* in Sweden, or *Finantsinspektsioon* in Estonia) only one consolidated register containing both banking and insurance parts of the group will need to be reported. This is for the reason as in accordance with the DORA requirements and supervisory needs of the competent authorities, the competent authorities may require access to the registers of information for the financial entities under their supervision.
444	Reporting group registers/ consolidation	What does it mean that the contents of the register should be available at the financial entity, sub-consolidated and consolidated levels? How to do it in a situation where the holding includes financial entities, their agents and ICT suppliers, + external (outside of the holding) ICT suppliers?	The obligation to keep registers of information applies only to financial entities, so the financial entities belonging to a group of financial entities will need to be able to produce a register of information at the level of an individual financial entity, whereas the parent undertaking of such financial entity at the sub-consolidated, or consolidated level would need to be able to produce also register of information at sub-consolidated or consolidated level respectively. ICT service providers belonging to the group are not considered as financial entities and should not have registers by themselves, however, if they are offering ICT service to the group entities then they are considered as intragroup-service providers to be recorded in the registers kept by the financial entities belonging to the group.
45	Reporting group registers/ consolidation	Is it possible to report various entities? In case we submit the register for a group of entities, example sectorial entities that report to the same CA and each of them maintain its own register, so we expect informing in this table	The consolidated register to be maintained by the entity in charge of the reporting (e.g. parent undertaking of a group of financial entities) should include information regarding all financial entities in the scope of the group. Where all of such entities are within the supervisory responsibilities of the same competent authority then only one consolidated

##	Category	Question	Answer
		that each entity is responsible to maintain its own register)	register containing info regarding the subsidiaries will need to be reported. Each entity that is part of the group will still bear the responsibility for maintaining own register, but the reporting for the purposes of the CTPP designation can be done at the consolidated level.
46	Language	Can financial entities provide registers in languages other than English?	Yes. The register can be reported in other languages than English, however, internal consistency of the registers should be ensured, i.e. information for all financial entities covered by the same register is provided in one consistent language. For languages using non-Latin alphabet, financial entities are requested to provide the registers using Latin alphabet.
47	Filling templates: treatment of missing data	When some fields cannot be filled, the field must be left blank or "not applicable" must be entered?	If financial entities are not able to provide some information, they can leave the relevant data fields blanks. However, no blanks should be left for the data fields that are identified as mandatory key values (e.g. identifies of financial entities, contracts, or ICT third -party providers), these data fields should be filled with relevant information (see also questions on identifiers), on a best effort basis.
48	Tools for the dry run: templates	Would it be possible to automatically fill in the RoI with a large amount of information?	Yes, it is possible to paste large amounts of data, as long as the data are in the correct format as per reporting requirements (e.g. format of date, draft DPM member codes in the case of closed lists of options).
49	Tools for the dry run: templates	All of the column names are different to the Register of Information RTS. Does that mean	The templates used for the dry run exercise have been amended to reflect the data point model, which is the integrated reporting model used also for other types of prudential reporting, especially by credit institutions. The changes into the labelling of the templates

##	Category	Question	Answer
		that the ITS will contain a large number of changes when it is published?	and drop-down lists included in the final report on the draft ITS on registers of information have been aligned to the data point model. The ESAs aim at incorporating these changes in labelling into the final text of the ITS that is being adopted by the EU Commission to ensure full alignment about between the templates included in the legal text and data point model. These changes are mostly in labelling and presentation of information. As for other potential changes that may be introduced into the final ITS once adopted by the EU Commission, the ESAs cannot comment on the legislative process.
50	Tools for the dry run: templates	In the last release of the templates, the Annex II that relates to the data field b.06.01.0020 'Licenced activity' has completely changed. Could the ESAs provide detailed information and a clear example on how they expect this field to be filled-in?	The data field b.06.01.0020 'Licenced activity' refers to Annex 2 of the Final report of the Draft ITS on Register of Information. This annex contains references to the sectoral legislation relevant for every financial entity type setting out specific licence activities. The Annex 2 itself does not set out any specific list of the activities that could be used directly to fill in the data field, instead the FE should have referred to the relevant sectorial legislation for the list of activities applicable to their financial entity type. The draft data point model made available for the dry run provides the blow out of Annex 2 with and includes all types of licenced activities from the sectoral legislation referred to in Annex 2, so FE need to choose the most relevant one or introduce several lines, should there be other licenced activities supported as well. A mapping of licenced activities to the types of financial entities based on the relevant sectoral legislation can be found (here).

##	Category	Question	Answer
51	Tools for the dry run: templates	Instructions in the final report of the draft ITS on the register of information indicate that in case the function is not linked to a registered or licenced activity, 'support functions' shall be reported (data field b.06.01.0020). But it seems that the drop-down menu does not show that option.	The ESAs acknowledge the error in the draft data point model that is missing 'support functions' as value. This will not be possible to change in the materials for the dry run, but the ESAs take note of this for the finalisation of the reporting technical package for the formal steady-state reporting. For the dry run, financial entities are advised to choose the closest activity, or leave the data blank, should this relate to the missing value of 'support functions'.
52	Tools for the dry run: templates	Is it possible to facilitate a drop-down list for the field b_01.01.0050 'Competent Authority'.	This is not feasible to do for the dry run exercise. The ESAs may assess the feasibility of such breakdown for the steady-state reporting.
53	Tools for the dry run: templates	Using codes instead of actual values in the columns that are 'Closed set of options' is may be working for reporting but is not user-friendly for the registers as a tool. Can the VBA macro do this conversion from values to codes?	The templates used for the dry run exercise have been amended to reflect the data point model, which is the integrated reporting model used also for other types of prudential reporting, especially by credit institutions. The changes into the labelling of the templates and drop-down lists included in the final report on the draft ITS on registers of information have been aligned to the data point model. The alignment of the data point model with all other elements of reporting also ensured in the consistent approach to the used of various codes for reporting purposes. The codes are data point members that need to be reported in the consistent way, so the reporting systems could work. It is noted, that the templates provided are for the reporting of the registers of information and are not aimed to facilitate the business use of the templates for the purpose of ICT and

##	Category	Question	Answer
			third-party risk management, where the financial entities are free to implement the templates and the requirements in a way that is most suitable for them, where the codes used in the data point model for reporting purposes, can be translated into more readable values by looking at the labels in the dropdown sheets of the provided template.
54	Tools for the dry run: templates	How to identify mandatory data fields?	The reporting instructions provided in the Final Report on the Draft ITS as well as instructions provided in the worksheet 'Instruction' identify which data fields are mandatory, including their conditionality, where relevant.
55	Tools for the dry run: templates	What are the relationships and mappings between the "Type of entity" field (eba_CT:x12 Credit institutions, eba_CT:x599 Investment firms etc.) and the licenced activities (RT.06.01.0020- eba_TA:x28 Payment services, eba_TA:x170Advisory services, etc.) for each type of entity?	A mapping of licenced activities to the types of financial entities based on the relevant sectoral legislation can be found (here).
56	Tools for the dry run: templates	What determines/differentiates a key column to a non-key column?	Key values are clearly identified in the data point model (annotated table) with <Key value>.

##	Category	Question	Answer
57	Tools for the dry run: templates	Would making a note in a field outside of the defined excel spreadsheet, will that have an impact on CSV/JSON file? (for example, note with a name of contracting parties on some of the tabs to make things easier to check.	It is not advisable to change the structure of the XLS template used for reporting, adding columns and text. Where the xls-csv conversion tool provided by the ESAs is used, this may have an impact on the functioning of the macro and on the correct extraction of data.
58	Tools for the dry run: templates	The excel template provided for the dry run exercise will be maintained by the ESAs for future CTPP taxonomy releases?	In addition to the final text of the ITS on register of information, the formal reporting will be supported by the usual reporting technical package (data point model, taxonomy and validation rules, where relevant) that will be aligned with the final text of the ITS. The excel templates for the register that have been provided for the dry run exercise will not be a part of the technical package.
59	Tools for the dry run: templates	The "XLS Master Template DORA RoI dryrun.xlsb" is completely protected. It is not possible to sort or to filter. Could additional columns be added to it, such as internal reference numbers and so forth?	The file is protected as the structure needs to be maintained for the macro to correctly work. We discourage to unprotect the file and manipulate the structure as this can have an impact on the correct extraction of data.
60	Tools for the dry run: templates	There are some references to annexes II, III and IV in the template in the "Instructions". Where is the information about annexes II or IV in the "Drop down"?	In the Excel templates only the DPM members of the closed lists of option have been reported. For the complete information of the Annexes please refer to the draft ITS.

##	Category	Question	Answer
61	Tools for the dry run: templates	Art. 4 (2) ITS RoI: if an additional row is necessary (more than one value), is there a need to fill all the data points again in the additional row or just the data point (column) where more than one value is valid?	Yes, all rows need to be completely filled.
62	Tools for the dry run: templates	What if there are several data values to be reported for the same item, e.g. several location of data centres, how to report them?	All entries should be provided on separate rows, so if you have two data centre locations, then you would need to add rows filled with the same information, but the data centre location to be provided.
63	Tools for the dry run: templates	Does the dry-run excel template allows for automation whereby data can be automatically populated for all cells referring to the same information according to the logical key?	The dry run excel templates do not allow for automated population.
64	Tools for the dry run: templates	With Excel workbook protection, it is not possible to add drop-down lists for relational keys. Would it be possible to enable this modification in order to simplify completion and avoid cut-and-paste errors?	Keys are mandatories in a populated row. However, for the scope of the dry-run exercise missing mandatory information outside the master data, will not prevent the CSV to be created. Those errors are flagged and should be corrected for the steady state.

##	Category	Question	Answer
65	Tools for dry run: validation rules	Will there be specific validation rules?	Given the qualitative nature of the templates for the register of information and the voluntary nature of the dry run exercise, there are no DPM-based validation rules in the dry run.
66	Tools for the dry run: Conversion tool	Would it be possible to check the VBA code from the security perspective.xlsm file interferes with this. Would it be possible to remove protection or make available an unprotected version?	The ESAs are aware security policies can interfere with the use of the macro. In this regard, please notice that the .xlsm file is not protected, there is a protection of Check list Sheet but password free, so users can easily unprotect by clicking on the "Unprotect Sheet". The VBA code is unprotected and can be seen and exported from the file, however for your convenience find attached the code extracted. There are several parameters which are embedded in the .xlsm, therefore the standalone code will not be usable.
67	Tools for the dry run: Conversion tool	Will the conversion tool be maintained for the steady-state reporting or will there be another tool to convert from excel to CSV in the actual report? (after the Dry Run exercise)	No. The xls to csv conversion tool has been developed solely for the purposes of the 2024 dry run exercise and will not be updated and maintained for official DORA reporting
68	Tools for the dry run: Conversion tool	Template is protected and all fields are mandatory. In case not having all information, will that be a problem for converting into CSV / submitting?	Keys are mandatory in a populated row. However, for the scope of the dry-run exercise missing mandatory information outside the master data, will not prevent the CSV to be created. Those errors are flagged and should be corrected for the steady state reporting.

##	Category	Question	Answer
69	Tools for the dry run: Conversion tool	When a user runs the "Generate DORA RoI CSVs.xlsm" he/she might run into a run time error: "Index outside of valid range" *[in another language than English]*. When debugging the result might lead to "country_code" being empty. "Generate csv" via this tool ended with macro error (country_code = Right(Trim(wbRen. Worksheets ("b_01.01").Range("D7").Value), 2))	This error may be due to the different language setting from the English in which the code has been developed. If the regional settings of the OS have been modified to English, the user can try installing the Office English package. If this does not solve the error, the user can contact the ESAs to further debug the issue.
General questions regarding the registers of information – responses are applicable to the dry-run exercise 2024			
70	Scope of the register	Should financial entities include information about branches into the RoI?	Yes. The RoI cover all branches of financial entities with a set of dedicated templates, to the extent these branches are located in the EU/EEA/are supervised by EU/EEA competent authorities.
71	Scope of the register	To what extent should the register of information cover entities that are located in third countries (subsidiaries and branches in third countries)?	The scope of the registers of information held at the sub-consolidated and consolidated basis should reflect all financial entities that belong to the consolidation scope in accordance with Directive 2013/34/EU.

##	Category	Question	Answer
			For the purposes of the reporting of the registers of information to the ESAs, including in the context of the dry run, the registers of information should include only financial entities licenced and operating in the EU, therefore financial entities that are subsidiaries of the EU financial entities in third countries may be excluded for the purposes of reporting to the ESAs.
72	Scope of the register	Are IORPs expected to consolidate their registers with the sponsor's financial entity? Would they be expected to be separate?	Consolidation is expected for Financial Entities in scope of DORA part of the same group. If the sponsor is not a financial entity in scope of DORA or if the sponsor is not part of the same group, consolidation is not expected.
73	Scope of the registers	There are some fields that refer to contracts that have already ended (b_02.02.0080, b_02.02.0090). Is there any age limit to include these contracts in the register?	In accordance with the requirements of the draft ITS, financial entities shall maintain the information in the register of information in relation to contractual arrangements that are terminated for at least 5 years after the termination of the provision of the ICT services. This requirement shall apply to the contractual arrangements in force from the date of application of DORA.
74	Definition of ICT services and ICT service providers	What types of third-party provider should be considered ICT third-party providers?	The definition of 'ICT service' in Article 3(21) of Regulation (EU) 2022/2554 intentionally maintains a broad scope. Recital (35) of Regulation (EU) 2022/2554 indeed clarifies that, with the aim of maintaining a high level of digital operational resilience, the definition of ICT services should be understood in a broad manner to the extent such services encompass digital and data services provided through ICT systems on an ongoing basis. Therefore, financial entities are responsible for undertaking such assessment for the services they rely on.

##	Category	Question	Answer
			Given the number of questions received on the interpretation of ICT services and ICT service providers received from stakeholders requiring a legal interpretation, in order to provide legal certainty, the ESAs having liaised with the European Commission have agreed to respond to these questions via a formal Q&As in due course. For the time being, the financial entities are invited to register their contracts on a best effort basis taking into account that the Register of Information is also an ICT third-party risk management tool.

The ESAs also remind that the dry-run exercise is based on the final report published on 17 January 2024 and is based on a best effort basis. |
| 75 | Definition of ICT services and ICT service providers | In what circumstances are service providers (non-ICT) to be considered ICT third-party service providers? Recital 7 stipulates that when a financial entity outsources a function that makes use of a supportive ICT service that service provider should be considered a ICT third-party service provider. | Consistently with DORA Article 3(19), all third-party service provider providing ICT services to a financial entity are considered as ICT third-party service provider.

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##	Category	Question	Answer
76	Populating the register	In the register an ICT service provider can only be linked to one function, how an ICT service provider can be mapped to multiple functions.	ICT TPP could be linked to multiple functions and ICT services. For each different options, a entry (row) should be added.
77	Populating the register	Referring to RT.02.02.0170 - How to define the data sensitivity?	Financial entity could provide explanation or description on how it assesses the data sensitivity in template b.99.01
78	Populating the register	In relation to column RT.02.02.0020, multiple entities often make use of a contract; in such case, should the data be split to multiple rows? The same question applies to other data points which can result in multiple entries. For example in column RT.02.02.0060	In case of multiples entities making use of the same contract, financial entities should add additional row to reflect the situation in the register of information
79	Populating the register	RT 06.01.0060: if an ICT service providers not identified by the financial entities as providing ICT services supporting critical or important functions, should this be still included into the register?	Yes, DORA article 28(3) requires the financial entities to maintain and update a register of information in relation to all contractual arrangements on the use of ICT services provided by ICT third-party service providers.

##	Category	Question	Answer
80	Intra-group service providers	What type of ICT TPPs need to be reported in template RT.05.02?	All direct ICT third-party service providers and subcontractors supporting a critical or important function, or material parts thereof (either they are intra-group or not) are to be reported in the template RT.05.02 when they are part of the ICT service supply chain
81	Intra-group service providers	If an unlicenced group service company signs the TPP ICT services contracts and then has a contract with the Group re/insurance undertakings to provide the ICT services, should this be considered as intra-group outsourcing or signing the contracts on behalf of the entities using services. Is it mandatory to report all contractual arrangement for the use of ICT services provided by the same ICT TPP (including intragroup provider)?	Article 30(1) of DORA reads *'The rights and obligations of the financial entity and of the ICT third-party service provider shall be clearly allocated and set out in writing. The full contract shall include the service level agreements and be documented in one written document which shall be available to the parties on paper, or in a document with another downloadable, durable and accessible format.'* The RoI templates explicitly request to report for each contract, the entities signing the contract, the ICT third-party service provider providing the ICT services and the financial entities making use of the ICT services. In case of multiple relations, additional row should be added
82	Intra-group service providers	Does the RoI have to include the intra-group ICT service providers?	Yes, the RoI templates included case where financial entities make use of ICT services provided by intra-group ICT service provider.

##	Category	Question	Answer
83	Intra-group service providers	Are branches considered as financial entities?	Branches are not financial entities but are part of the financial entities which are head office.
84	Intra-group service providers	Are entities, established in third-countries, providing ICT services to entities part of the same group as ICT intra-group service providers?	If entities part of the group but registered outside the Union provide ICT services to Union based FEs within the same group, they should be considered as intra-group ICT TPP and treated in the register of information accordingly.
85	Intra-group service providers	How shall the financial entity at the top of the group be treated in the consolidated information register, if they are providing all IT-Services for the financial entities of the sub-group? In fact, all the information would be integrated in the consolidated template multiple times (for each subsidiaries using the ICT services provided by the same ultimate parent)	Such parent undertaking shall be treated as intra-group service provider. Since the consolidated register also needs to include arrangements from the perspective of the entities using the services, then the information should include information regarding all entities covered by the arrangements.

##	Category	Question	Answer
86	Supply chain	Which type of ICT TPPs are to be reported in the ICT service supply chain?	The ICT service supply chain comprises the list of the relevant subcontractors when providing an ICT service supporting critical or important function from the FE making use of the ICT service.
87	Supply chain	Is there a limitation in the rank of subcontractor in the ICT service supply chain?	No, there is no theoretical limit in the rank of an ICT third-party service provider in a ICT service supply chain.
88	Supply chain	The information on the ICT service supply chain (RT 05.02), makes reference to the ICT third-party service provider and the recipient of sub-contracted ICT services. What does it mean?	The recipient is the ICT third-party service provider at rank n-1 and the subcontractor providing service is then at rank n.
89	Supply chain	What is the signification of the rank of a ICT TPP within the ICT service supply chain?	Rank in the ICT service supply chain does not refer to group structure of financial entities but only to the position of an ICT service provider within the ICT service supply chain (irrespective whether some ICT service providers are intra-group or not)
90	Supply chain	How to classify a service which belongs to multiple types of ICT services? E.g. SaaS service which also provides ICT security services	Each financial entity has to assess to which type of ICT services a specific service belongs to. In case an ICT service provider is providing multiple ICT services within a same contractual arrangement to one or more financial entities, additional row should be added in the corresponding templates to reflect the situation.

##	Category	Question	Answer
91	Supply chain	Could ICT intra-group service providers be a subcontractor in an ICT service supply chain?	Sub-contractors could be intra or extra group
92	Supply chain	Is it correct that a supply chain (identified by the contractual arrangement number and the ICT type of service) is composed by only direct/sub-contractors sharing the ICT Service type? If so, how should be built a supply chain of a SaaS service where sub-contractors may be IaaS/PaaS sub-contractors?	The ICT service supply chain is defined by:

The contractual arrangement reference number between the FE and the direct ICT TPP (rank 1 in the ICT service supply chain);

The 'ICT service' provided by the direct ICT TPP if the ICT service is supporting a critical or important function or material part thereof;

All relevant subcontractors that effectively underpin the provision of the ICT service (i.e. all the subcontractors providing ICT services whose disruption would impair the security or the continuity of the service provision). |
| 93 | Populating the register | Regarding the ICT supply chain, in the case of a Temporary Joint Venture (TJV), should the leading company or all the companies participating be reported In the RoI? | The identifier of the actual ICT TPP part of the ICT service supply chain should be reported (even in case of temporary joint-venture). Information on the owners of the joint-venture are to be reported in template RT.05.01. |
| 94 | Populating the register | When RTO and RPO are defined for ICT services supporting functions instead of a function itself. Would it then need to be the RTO/RPO of the | This is for the financial entities to assess which RPO and RTO is relevant for the functions according to article 12(6) of DORA. |

##	Category	Question	Answer
		service with the longest RTO/RPO to be reported?	
95	Populating the register	What audit types are identified to fill in RT.07.01.0070?	The type of audit could be: (i) the internal audit department or any other additional qualified personnel of the financial entity, (ii) a joint team together with other clients of the same ICT third-party service provider ("pooled audit") or (iii) a third party appointed by the supervised entity to audit the service provider.
96	Populating the register	Template RT.02.03: Can you please provide an explanation on how to fill in this template?	The objective of this template (table) is to link one intra-group contractual arrangement to another intra-group one. For example: Entities A, B and C are part of the same financial group. Entity A is contracting with Entity B (contract 1) and Entity B is contracting with Entity C (Contract 2) and Entity C is the subcontractor of Entity B for the ICT service used by Entity A. In this case, the template RT.02.03 will contain one row linking Contract 1 and Contract 2.
97	Contractual arrangements	How do the types of contractual arrangements for the RoI (standalone/framework/subsequent or associated agreements) fit with the requirement of "one written document"?	It depends on the structure of the contract set between the FE and the ICT TPP, for example, they have to indicate if the contract is standalone or a waiver or a complement to a master contract
98	Populating the register	For a small and interconnected firm, would it be admissible that none of the functions are deemed essential? or you expect that every	It is up to each FE to assess which of their functions are deemed important or critical functions, based on the definition of DORA article 3(22).

##	Category	Question	Answer
		bound entity has at least one or more functions classified as essential for the purposes of DORA?	
99	Populating the register	For the field RT.01.02.0070 (Date of last update) what exactly the last update date means and how to calculate it?	The date of last update is the date of last modification of the RoI.
100	Populating the register	Should standard criteria be used to define a critical or important function? if so, what are they?	FE shall determine which of its functions are critical or important based on its own assessment and/or applicable sectoral regulations, consistently with the definition of DORA article 3(22).
101	Populating the register	What does "on an ongoing basis" mean in definition of ICT services in DORA article 3(21)? What are the drivers that can support us to identify "on an ongoing basis"?	Only ICT services provided on an ongoing basis are considered; therefore, a one-time purchased ICT service (a single, static solution) without ongoing maintenance, support, or updates is not considered.
102	Populating the register	Regarding the tab RT.02.01.0020, what does overarching arrangement mean?	It depends on the structure of the contract set between the FE and the ICT TPP, for example, they have to indicate if the contract is standalone or a waiver or a complement to a master contract. Overarching arrangement correspond for example to master or framework contractual arrangement.

##	Category	Question	Answer
103	Populating the register	Should all financial entities of a given group using the services of the same contractual arrangement be listed in the RT.04.01?	Yes.
104	Populating the register	How to fill in b_05.02.0030 that requires s "Identification code of the ICT third-party provider" instead of sub-provider? How to populate the columns b_05.02.0030 and b_05.02.0060? What is the link between them?	The column b_05.02.0030 requests the identifier of the direct ICT TPP or subcontractors. Therefore, column b_05.02.0050 requests the rank (1 for the direct ICT TPP, higher number for sub-contractors). Also, column b_05.02.0060 requests the identifier of the recipient of the service of the ICT TPP (or subcontractor) identified in column b_05.02.0030. All those columns are required to link the ICT TPP to each other in the ICT service supply chain.
105	Populating the register	In the template RT 02.02. About the legal entities making use of the service is it necessary to list all the Providers also that ones that don't have signed the agreement but use only the services?	Yes, but normally there should be contractual arrangement between the entity making use of the ICT service and its provider.
106	Populating the register	b_01.02.0050: how to deal with entities that fulfil more than one given criteria? An entity can	The higher level should be selected, which is in this case: "parent other than ultimate parent".

##	Category	Question	Answer
		be "subsidiary" & "parent other than ultimate parent" & "outsourcing" at the same time.	In case of outsourcing, it means the entity does not belong to the group so it cannot be at the same time a parent entity and an external entity.
107	Populating the register	For the : "Identify the ISO 3166–1 alpha–2 code of the country in which the global operating headquarters of ICT third-party Service Provider (SP) are located." If there is a contract with an ICT TPP in one EU country (that has a parent company based in USA), does the entity based in the USA need to be reported?	All ICT TPPs are to be listed in template RT.05.01 where information in relation to the ultimate parent undertaking is requested
108	Populating the register	In all the cases where the currency is required, could the euro be used as the currency always to be adopted or is it mandatory to indicate the currency indicated in the contract?	The currency is always in relation to a specified column. Depending on the currency used to express the amount, the relevant currency should be reported.
109	Populating the register	Will be more detail and context on the 19 DORA ICT service types be provided to support the correct selection? How to deal if a contract covers more than 1 services ?	FE could refer to the description provided in the annex listing the different category of ICT services. In case of multiple ICT services for a same contractual arrangement, additional rows shall be added accordingly.
110	Populating the register	For a given ICT service, do we report on a consolidated, per contract/Master service agreement (MSA) basis? Or for each Statement	The FE is to assess which level of granularity is the most appropriate when filling in the template.

##	Category	Question	Answer
		of Work/Order form separately. For example: One software service, one contract, 5 order forms/statements of work - do we need to report 5 lines or 1?	When same FEs are making use of the same ICT services at a MSA level it may be more relevant to report at MSA level (overarching agreement). When some specificities need to be considered at a more granular level (order form) for one specific FE or ICT service, it may be more relevant to consider filling in at the order form level in this specific case.
111	Populating the register	If financial entity uses an ICT reseller to purchase an ICT software, how this relationship should be recorded in the ROI?	If the reseller is not providing the ICT service on an ongoing basis, it should not be considered as an ICT TPP.
112	Populating the register	In case of a Group, is there a need to aggregate information in a unique file, is it possible to have a version of the file where it is possible to do copy and paste of multiple rows?	The RoI at consolidated level is the 'sum' of the RoI at entity level of the subsidiaries composing the group, therefore, it is expected to retrieve all the information at entity level in the RoI at consolidated level. From data management perspective, every row is different from each other. However, it is possible to have row that are very similar with only a difference in one column.
113	Populating the register	Criticality or importance assessment: there is no explanation for the 3 options, or where can they be found?	The assessment of criticality or importance of a function rely on the FEs sectoral regulation where applicable and/or its own judgement.
114	Populating the register	Should direct ICT service providers be the single ones considered or also third party providers providing services through ICT system? In this second case is it necessary to include the ICT service in the main contract?	The ICT service supply chain (i.e the direct ICT and the relevant subcontractors that effectively underpin the provision of the ICT service supporting a critical function or a material part thereof) are to be reported only when a critical or important function is supported by the ICT service.

##	Category	Question	Answer
115	Populating the register	If the FE outsources to a group entity which is not a FE and then the group entity sub-outsources to an external 3rd party for part of services and provides few services itself. Is it possible to provide an example file where a mix of group first and external 3rd parties is envisioned?	Example B illustrates such case published on the dry run exercise web page (here).
116	Populating the register	In case of one contract with two services of the same type of service, can only one row be reflected in the register?	Yes. The importance is not the quantification of the ICT service but the category.
117	Populating the register	What is the expected level of granularity for the Functions identified in RT.06.01?	Each FE is to assess which level of granularity is the most appropriate.
118	Populating the register	It is specified that in order to report the ICT service supply chain in terms of subcontractors it should be adopted a risk-based approach. How should this approach be implemented?	In relation to the ICT services supporting a critical or important function or material part thereof, the register of information includes all subcontractors that effectively underpin the provision of these ICT services (i.e. all the subcontractors providing ICT services whose disruption would impair the security or the continuity of the service provision). In case an ICT intragroup service provider makes use of subcontractors to provide their ICT services to the financial entity, at least the first extra-group subcontractor even if the ICT services provided do not support a critical or important function or material part thereof.
119	Example A	Related to the Example A contained in the technical package: B_02.02.0050 How could the same function identifier (F1) be used three times if there are three different subsidiaries using (making use) the service?	In principle, a function identifier identifies a combination of the 3 following elements: - LEI of the FE; - Licenced activity of the FE; - Function name Therefore, it is not possible to have the same function identifier to be used for different FEs (subsidiaries).

##	Category	Question	Answer
120	Populating the register	Does the field "b_05.01.0050 - Country of the ICT third-party service provider's headquarters Country" refer to the country of tax residence?	Usually, the country of establishment of the entity is the country of tax residence.
121	Populating the register	In RT.01.02.0110 is it possible for the financial entities to provide a best estimate?	Yes. This information is instrumental for CTPP designation. Therefore, it is expected that each FE to be able to determine their own total assets values
122	Populating the register	How can a financial entity consolidate the registers in case of several sister companies, and in case those are supervised by different regulators?	If there is no ultimate parent undertaking being supervised by the integrated competent authority, or several sectoral authorities at which level consolidated register can be provided, then the financial entities will need to report their registers of information individually (on individual basis) to the relevant competent authorities.
123	Populating the register	How to report in RT.02.02.0050 several Functions supported by the same suppliers?	If a same contractual arrangement (in RT.02.02.0010) and same ICT TPPs (either intragroup or external ICT TPPs) in RT.02.02.0030 is related to multiple functions (also the same approach for ICT services), an additional row should be added for each function.
124	Populating the register	How to report in case where the provision of ICT services is done across several countries?	In case of provision of service across multiple countries, an additional row should be added for each country
125	Definition of ICT services and ICT service providers	Would external services such as those provided by VISA, Mastercard be considered as ICT services? If yes, under which category they should fall?	DORA recital 63 states that participants in the payment services ecosystem, providing payment-processing activities, or operating payment infrastructures, should also be considered to be ICT third-party service providers under this Regulation. The category S07 should be appropriate in the examples provided however the FEs are the most relevant to determine under which category an ICT service based on their own assessment.
126	Example B	Related to the Example B contained in the technical package:	Entity B,C and E are financial entities whereas entity D is not a financial entities but an ICT intragroup provider.

##	Category	Question	Answer
		B_03.01.0020 Where Entity "D" comes from? Only "B", "C" and "E" are listed in sheet b_01.02.	
127	Example B	Related to the Example B contained in the technical package: B_04.01.0020 Why does "B" appear twice here, once as "Branch" and once as "not Branch"? Is there a reason for this or has it been a mistake?	If the head office (financial entity) of the branches is located in the Union, the branches and the head office are considered as a same and single financial entity (legal person). Therefore the branches can share or not the same identifier.