




 <p>EBA European Banking Authority <small>European System of Financial Supervision</small></p>	<p align="center">Consultation Paper On the XBRL Taxonomy related to the EBA final draft Implementing Technical Standards on Supervisory Reporting Requirements under the draft Capital Requirements Regulation</p>	 <p>Atos Consulting & Technology Services</p>
	Date: 9/10/2013	



Summary of Response to Consultation Paper			EBA/CP/2013/36
CP No. 036 – XBRL Taxonomy to the EBA Final draft ITS under CRR			17.09.2013
No.	Reference	Comment	Proposal for consideration
1.	General Comment	<p>Atos welcomes the opportunity to provide its comments on the Consultation Paper EBA/CP/2013/036.</p> <p>Atos has been engaged in promoting XBRL standard adoption since 2006, supporting numerous initiatives including former C-EBS COREP XBRL Taxonomy first definition and implementation in Spain, Dimension specification contribution and Formula Specification development and testing in collaboration with XBRL International.</p> <p>We would like to congratulate EBA for this final draft Implementing Technical Standards under CRR using XBRL as we strongly believe on the advantages it provides regarding unique format and harmonized reporting practice across Europe.</p> <p>Our experience in XBRL adoption projects in financial entities and competent national authorities includes a good knowledge on the current Taxonomy Architecture and Data Point Modelling methodology used by EBA since their early</p>	

	<p align="center">Consultation Paper On the XBRL Taxonomy related to the EBA final draft Implementing Technical Standards on Supervisory Reporting Requirements under the draft Capital Requirements Regulation</p> <p align="right">Date: 9/10/2013</p>	
---	--	---



		<p>inception and a close follow up on its evolution based on our collaboration on several projects and best practice initiatives (Bank of Spain, Eurofiling, the CEN WS XBRL project, etc.).</p> <p>We expect a major success in the roll out of this new regulatory reporting proving that national competent authorities will have guidelines and support to achieve CRR reporting deadlines.</p> <p>Atos as a member of XBRL Europe and XBRL Spain has taken part in the elaboration of prior comments linked with this project and supports their positioning in this matter.</p> <p>In addition to those comments provided we would like to disclose further details that could be of valuable interest to EBA as part of this response.</p>	
2.	XBRL Taxonomy Formula	<p>Response:</p> <p>Validation checks have been implemented using XBRL Formula in an organized manner, using functions, patterns and a structured documentation. It seems that the scope of these validation checks is covering only a subset from the total, leaving uncovered a set of validation requirements which is feasible to be implemented using XBRL standard.</p> <p>Explanation:</p> <p>Pattern identification</p> <p>We would like to congratulate EBA team for their effort on pattern identification for validation checks proven a very good analysis. It is also relevant the</p>	



	<p align="center">Consultation Paper On the XBRL Taxonomy related to the EBA final draft Implementing Technical Standards on Supervisory Reporting Requirements under the draft Capital Requirements Regulation</p> <p align="right">Date: 9/10/2013</p>	
	<p>implementation of generic functions defined for specific cases identified (i.e. interval-arithmetics).</p> <p>Formula Documentation</p> <p>Notation and file organization is also clear and well documented, aiming to facilitate implementation and testing.</p> <p>ITS Rule Coverage</p> <p>Regarding the ITS rules indicated in the page 5 of the consultation CP.2013.36 as not being implemented in the XBRL taxonomy:</p> <p><i>- Cross-period rules are not expressed in XBRL, nor are rules requiring information from more than one instance file (i.e. cross validations between XBRL modules). This is because the XBRL formula specification, and technical implementations of it, is considered less well developed in this area, and it is less clear cut what the effect of a failed validation rule should be in such circumstances. These checks will however likely be implemented as second level (non-XBRL) checks applied by the EBA on the reception of data.</i></p> <p>Our main concern regarding implementing those rules outside the standard is failing in achieving unique harmonized format across national competent authorities considered not being a good practice in general. The XBRL Formula specification is well developed in this area, through all standard cycle to reach recommendation status (2009-2011).</p> <p><i>- Rules from the ITS that document that two table cells are in fact the same item of data are unnecessary in XBRL as these will be the same XBRL data fact, and so</i></p>	<p>We would like EBA to seriously consider using XBRL Formula sub-modules to keep the ITS implementation as a whole standard set harmonized.</p> <p>Bank of Spain's is a good example of reference implementation to look at.</p>

	<p><i>only reported once within a single instance file. Where these identities exist between instance files, the previous point applies.</i></p> <p>It is unclear EBA position on the same items in a single instance file issue. It would be very helpful if the guidelines could reflect those cases and if EBA will consider this information as wrong or correct keeping the information consistent in any case.</p> <p><i>- An additional few rules that were more complex to map to XBRL, such that the cost/benefit assessment of including them was unfavorable, are not included.</i></p> <p>After reviewing the ITS rules, and based on our experience on implementing the whole set of reporting formulas for Bank of Spain in a short timeframe, we conclude that the cost/benefit of having them in the same unique standard format is very positive.</p> <p>We consider feasible and highly recommended to implement and represent those ITS rules using XBRL through Formula specification sub-modules. There is also a multi-instance module to cross validation between XBRL modules.</p> <p>These sub-modules have already been used successfully proving uses cases in competent national authorities like Bank of Spain.</p> <p>The current status of this Formula specification including those sub-modules is Official Recommendation providing a full support of them by software industry as a standard.</p>	<p>In case EBA would find any case with additional complexity, the recommended alternative implementation to optimize these is using XBRL assertions to represent them and using custom functions to solve the validation coding providing an interface to implement the validation as a mechanism standard fully compatible with other supervisory XBRL implementations (NSA's and Level1 reporting).</p>
--	--	---



	<p align="center">Consultation Paper On the XBRL Taxonomy related to the EBA final draft Implementing Technical Standards on Supervisory Reporting Requirements under the draft Capital Requirements Regulation</p> <p align="right">Date: 9/10/2013</p>	
---	--	---

3.	<p>Supporting Documentation</p>	<p>Response:</p> <p>We have found the supporting documentation provided by EBA sufficient and relevant to clarify explanations aiming to help competent authorities to implement this new regulatory reporting, especially those national competent authorities without previous experience on XBRL standard.</p> <p>With regard to this supporting documentation we would like to highlight some issues:</p> <p>Explanation:</p> <p>"Representation in XBRL of the Data Point Model". 6 Public Elements</p> <p>Section 6 parr.2 describes how specific information describing concepts has been represented using generic or standard labels. It also points out in note 7 that legal references for each concept have not been implemented using reference linkbases, and a future solution will be provided.</p> <p>After reviewing all the dictionary we found that there is still a significant number of concepts missing definitions using label resources (generic and standard) with the role http://www.xbrl.org/2008/role/verboseLabel</p> <p>It seems that all dimension domain items have this label documented while metrics and other items different than dimension domain does not have it.</p>	<p>Suggested improvement for further release should be to include in separate label linkbases those missing definitions for concepts using the indicated role verboseLabel</p>
----	---------------------------------	---	--

	<p align="center">Consultation Paper On the XBRL Taxonomy related to the EBA final draft Implementing Technical Standards on Supervisory Reporting Requirements under the draft Capital Requirements Regulation</p> <p align="right">Date: 9/10/2013</p>	
		<p>example:</p> <p><i>http://www.eba.europa.eu/xbrl/crr/dict/exp:BA explicitDomainType item have properly indicated in XBRL the label and verboseLabel (similar for remaining domain dimension items):</i></p> <p>label en: <i>"Base items"</i></p> <p>verboseLabel en:</p> <p><i>"Defines the basic conceptual meaning of a data point. Identifies the framework in which a data point is included. For FINREP, it indicates in which group of element of the financial statement should be included the data point (eg assets, liabilities, equity, income, expenses). For COREP, it indicates whether the data point should be computed in the numerator (own funds) or the denominator (exposures) of the Pillar I solvency ratio.</i></p> <p><i>It determines whether the data point has a ""debit"" or a ""credit"" attribute."</i></p> <p>while a number of items which does not have verboseLabel defined, and , for example</p> <p><i>http://www.eba.europa.eu/xbrl/crr/dict/met:md131 monetaryItemType</i></p> <p>label en: <i>"Foreign currency translation (flow)"</i></p> <p>verboseLabel en: <i>empty (not defined)</i></p> <p>It seems that other public elements different than dimension domain items have not been documented using verboseLabel for some reason. It would be appreciated if EBA include this documentation in next releases.</p>

 <p>EBA European Banking Authority <small>European System of Financial Supervision</small></p>	<p align="center">Consultation Paper On the XBRL Taxonomy related to the EBA final draft Implementing Technical Standards on Supervisory Reporting Requirements under the draft Capital Requirements Regulation</p> <p align="right">Date: 9/10/2013</p>	 <p>Atos Consulting & Technology Services</p>
--	--	---



		<p>Regarding documentation role we have also found many concepts missing value for this resource in the Draft XBRL taxonomy.</p> <p>For example the domainItemType</p> <p align="center"><i>eba_x2 (CET1 Capital) has defined documentation "CRR 50 ¶."</i></p> <p>while other has missing:</p> <p align="center"><i>eba_x23 (SME) documentation (empty)</i></p> <p>We would like EBA to take note on these suggestions if they could be amended in final release as they could be valuable to facilitate implementation on national competent authorities systems.</p>	<p>Regarding this point we observe that DPM access data model structures are ready to support additional documentation and legal references.</p> <p>From XBRL standard point of view this should be part of XBRL implementation in the form of XBRL linkbases.</p>
4.	Supporting Documentation	<p>Response:</p> <p>With regard to supporting documentation we would like to highlight some minor issues caused by final updates on current model to be reflected on documentation.</p> <p>Explanation:</p> <p>"Representation in XBRL of the Data Point Model"</p> <p>[Chapter 7. Section 7.1 Parr.2] Regarding temporal dimension it should be noted that in the current model this dimension is defined as „REF" while in previous</p>	<p>We fully understand that those issues are minor changes and that</p>

	<p align="center">Consultation Paper On the XBRL Taxonomy related to the EBA final draft Implementing Technical Standards on Supervisory Reporting Requirements under the draft Capital Requirements Regulation</p> <p align="right">Date: 9/10/2013</p>	
---	--	---

		<p>version as shown in the document is „RF“</p> <p>[Chapter 7. Section 7.2 Parr.1] Current nomenclature for dimensions in the actual model is using a short sequence of three letters while in previous version of the document as indicated was “usually two, but not it is not limited to two...”.</p> <p>[Chapter 7. Section 7.2 sample Table.1] The name, id, of the dimensions indicated in the sample table should be updated to reflect the existing ones in the current model (i.e., MCC instead of MC)</p> <p>[Chapter 7. Section 7.3 sample Table.1] Similar than previous one, the dimensions should be updated to reflect existing ones in the model (the es_AP is the only one that remains existing in current version)</p> <p>Entity Identification</p> <p>After reviewing supporting documentation we would find helpful to include some guidelines in how national competent authorities should be reporting and managing at Level 2 the entity information and how EBA expects this information to be implemented in XBRL instance documents and context nodes in an harmonized and unique form across all countries in Europe.</p>	<p>the illustrative samples allow the general comprehension on the XBRL implementation guidelines on Data Point Model.</p> <p>The sample tables on Chapter 7 should be updated by EBA as minor updates on supporting documentation for future releases to enhance coherence and quality.</p> <p>We are aware of several initiatives regarding Legal Entity Identifier and CEN WS XBRL project CWA2 deliverables that maybe should be of value to EBA to clarify these guidelines.</p>
5.	DPM Model	<p>Response:</p> <p>Data Point Model has been perceived as a consistent methodology to define properly regulatory requirements where the complexity of the set of information, and the high volume of linked data was making difficult to achieve an</p>	

		<p>unambiguous data model.</p> <p>EBA team has provided through different draft versions and previous consultations a systematic DPM to implement this final draft ITS.</p> <p>Explanation:</p> <p>DPM Abstract Model Diagrams</p> <p>Regarding DPM, we find the supporting diagrams a very good progress in facilitating a harmonized application technical design on each national competent authority as clarifies any possible ambiguity on reporting templates.</p> <p>DPM tools for business user</p> <p>This methodology also allow business users to ensure that the proper regulatory information requested is being produced with the help of supporting tools built on top of DPM (i.e. Bank of Spain's DPM Architect, etc.)</p>	
--	--	--	--

6.	<p>DPM</p> <p>Access DB support tables</p>	<p>Response:</p> <p>Regarding DPM support Access Database we find very useful the provided tables allowing additional definition of concepts in the ITS implementation.</p> <p>Explanation:</p> <p>Concept Label Extension</p> <p>There are support tables to define concept labels in different languages.</p> <p>We would like EBA to provide clarification and guidelines regarding the proper method and process to use those tables or if EBA is going to provide those translations in future releases.</p> <p>This issue would be of special relevance for Level 1 reporting implementation.</p> <p>Legal References Tables</p> <p>Legal references are linked to each data point concept as indicated properly in the database tables.</p> <p>It would be very valuable if all references were populated in the tables. We have found only a subset of references documented in the tables.</p>	<p>It would also be a good practice to implement those references in the XBRL taxonomy. To avoid causing an additional linkbase overhead while loading, the XBRL reference linkbases could be provided without linking to the main entry points.</p> <p>They also could be configured in several XBRL industry processors to be optionally loaded reducing</p>
----	--	---	--



	<p align="center">Consultation Paper On the XBRL Taxonomy related to the EBA final draft Implementing Technical Standards on Supervisory Reporting Requirements under the draft Capital Requirements Regulation</p> <p align="right">Date: 9/10/2013</p>	
--	--	--



			overhead.
7.	XBRL Taxonomy Validation	<p>Response:</p> <p>We have validated the Draft XBRL Taxonomy using several processors currently available in the industry.</p> <p>The general conclusion is that a significant effort and dedication have been put in the development process resulting in an stable version ready for verification in each integration.</p> <p>Nevertheless, there are some issues found that we would like to comment for clarification:</p> <p>Explanation:</p> <p>Warning while loading taxonomy</p> <p>Several domains on dictionary result in an unexpected value in the role attribute for linkbaseref instead of the standard value defined in XBRL 2.1</p> <p>For example:</p> <p><i>Draft_XBRL_Taxonomy\www.eba.europa.eu\eu\fr\xbml\crr\dict\dom\ga\hier.xsd</i></p> <p>linkbaseref value <i>http://www.w3.org/1999/xlink/properties/linkbase</i></p> <p>instead of <i>"http://www.xbrl.org/2003/role/calculationLinkbaseRef"</i></p>	<p>In our opinion EBA should run an additional quality check review to verify that effectively the linkbases produced have their syntax updated to reflect the generic linkbase semantics accordingly.</p>

		<p>expected</p> <p>We understand the rationale evolution to use as much as possible the generic linkbase approach while defining relationships.</p> <p>Sample Instance data available</p> <p>This issue is something common to many taxonomy developments.</p> <p>It is appreciated the current effort to try to provide enough data to execute validation of the taxonomy.</p> <p>At this stage we find room yet to provide more complex reports with additional data to check further assertion and formula.</p> <p>Performance</p> <p>With respect to taxonomy performance, after reviewing several taxonomy processors and a full systematic loading and validation timing we conclude that current performance of taxonomy is in the expected range for this type of model and architecture.</p>	<p>It would be very valuable if EBA in future releases is able to provide a comprehensive set of conformance suite tests to execute specific COREP and FINREP taxonomy validations and formulae.</p> <p>Of special interest due to industry processors results, facilitating comparability of NSA's results to expected tests.</p> <p>It is worth noting that there is additional improvement room in optimizing several formula definitions (see point 2.)</p>
--	--	---	---

8.	XBRL Taxonomy Compliance	<p>Response:</p> <p>It has been reviewed for the whole Draft XBRL Taxonomy compliance with</p> <ul style="list-style-type: none"> . XBRL 2.1 - December 31, 2003 with Errata Corrections to February 20, 2013 . Dimensions 1.0 - September 18, 2006 with errata corrections to January 25, 2012 . Formula Specification 1.0 - 2009 - 2011 . Table Linkbase 1.0 PWD - May 17, 2013 <p>After reviewing we have not found any major issue regarding compliance except the use of Public Working Draft of Table Linkbase as explained in supporting documentation by EBA.</p> <p>In compliance with XBRL 2.1 we have assumed several deviations in the use of Label, Calculation, Presentation and Reference Linkbases as explained in supporting documentation which are indicated to be aligned with a more appropriate approach to current modelling requirements using DPM, generic linkbase, Formula and Table Linkbase specifications.</p>	
----	--------------------------------	---	--

		<p>Explanation:</p> <p>XBRL 2.1 linkbases compliance</p> <p>Calculation linkbase as defined in XBRL 2.1 was found very limited to represent properly the validation semantics of concepts modeled under COREP since 2008.</p> <p>Formula specification replaces and defines these semantics for complex validations.</p> <p>Presentation linkbase as defined in XBRL 2.1 reflected an effective classification of semantics when a unidimensional hierarchy of concepts was defined. Table Linkbase supersede these limitations to represent further classifications closer to the multidimensional information CRR defines and COREP and FINREP taxonomies are implementing.</p> <p>In the case of Label and Reference Linkbases, there is a preference of implementation on Generic linkbase to define the semantics for additional documentation, (see point 3 and 6.). A clear explanation in supporting documentation would be of valuable help understanding rationale behind this implementation choice for compliance. Especially significant if there is a potential case of national extension to add particular translated labels or resource documentation avoiding comparability and ambiguity issues.</p> <p>This issue seems of special interest due to the fact that a potential extension of these labels for Level1 reporting is envisaged by national competent authorities.</p>	<p>It would be very helpful if EBA could provide some guidelines in how the implementation choice of the taxonomy to use generic labels or label linkbases for each case and a consistent method to define them.</p>
--	--	---	--

		<p>Consultation Paper On the XBRL Taxonomy related to the EBA final draft Implementing Technical Standards on Supervisory Reporting Requirements under the draft Capital Requirements Regulation</p>				
				<p>Date: 9/10/2013</p>		
9.	General Comment	<p>Response:</p> <p>Regarding Level 1 and Level 2 Reporting, in our opinion there will be also significant harmonization advantages if each national competent authority applies the same standard format as part of the technical implementation for the data collection from their supervised financial entities.</p> <p>Atos strongly supports the proposal for XBRL technical format for validation rules on the implementation under CRR which is essential for a harmonized uniform reporting across the sector for both levels.</p> <p>Explanation:</p> <p>During last years the financial reporting has suffered a significant transformation causing the industry to support XBRL standard as common electronic format. Not only being used by financial entities to provide COREP and FINREP information, but to reuse it to response to many other initiatives resulting in a significant administrative burden reduction for those entities reusing IT resources on those systems.</p> <p>Some example cases are those financial group organizations operating in several countries that need to report to Securities Exchange Commission in USA, IFRS in several countries of Latin America, Integrated Reporting to provide social corporate information, listed financial entities in European countries using XBRL or EIOPA for report Solvency II information in a near future.</p>			<p>It should be worth noting by EBA this implementation decision in countries across Europe to obtain this unique format harmonization goal.</p>	

	<p align="center">Consultation Paper On the XBRL Taxonomy related to the EBA final draft Implementing Technical Standards on Supervisory Reporting Requirements under the draft Capital Requirements Regulation</p> <p align="right">Date: 9/10/2013</p>	
---	--	---

		<p>In our experience, the use of XBRL facilitates harmonization between entities and NSAs, enabling other non EBA regulatory practices with a cost benefit and comparability across sector far beyond regulatory requirements.</p> <p>Another case of example is the financial entities in Spain. After more than seven years of use of XBRL Standard between National Supervisor Bank of Spain and financial entities the general adoption of XBRL means that for any financial entity XBRL standard is seen automatically as the vehicle to implement any new requirement directive that come from Europe or from Legislation in general.</p> <p>Based on this cases there is a clear advantage of adopting XBRL both in Level1 and Level2 reporting reducing administrative burden both to financial entities and competent national authorities.</p>	
--	--	--	--