



31st May 2011

Ana Fernandes
The Transaction Monitoring Unit
The Financial Services Authority
25 The North Colonnade
London E14 5HS

Dear Ana,

Change to guidance: reporting of on exchange derivative transactions conducted through exchange platforms

Following our discussions so far, the FOA welcomes the opportunity to provide official feedback to proposed changes to the current *chapter 2 "Transactions reported through clearing platforms"* of the *Guidelines on reporting of On-Exchange derivatives (Aii and ISIN derivatives) September 2009*.

The FOA considers the suggested approach pragmatic and sensible and fully supports the proposal to report transactions conducted through OTC clearing platforms of exchanges exactly the same way as transactions executed on-exchange by using (as the instrument identification) either an Aii or ISIN code, depending on whether the OTC clearing platform is part of an Aii or ISIN market.

However, we would urge the FSA

- to keep the current title of chapter 2 as *"Transactions reported through clearing platforms"*; it appears that the term "on exchange derivative transactions conducted through exchange platforms" can be easily confused with "transactions executed on exchange";
- to highlight that this section of the guidance applies to all OTC clearing platforms within the EEA;
- to emphasise that this section of the guidance applies to transaction reports submitted to the FSA and that other regulators may have different requirements;
- to consider using the term "Aii and ISIN markets" in place of "Aii and ISIN derivatives".

Should you have any questions, please do not hesitate to contact me.

Please note that the FOA will provide feedback of relevance for other sections of the *Guidelines on reporting of On-Exchange derivatives (Aii and ISIN derivatives)* and the *TRUP* separate to this consultation.

Kind regards,

Devrim Baki
Regulatory Officer
Futures and Options Association