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30 November 2015

Dear Sirs and Madams,

Consultation Paper on Introducing Mandatory Clearing and Expanding Mandatory Reporting for OTC Derivatives Transactions

The International Swaps and Derivatives Association, Inc. ("ISDA") welcomes the opportunity to respond to the consultation paper on introducing mandatory clearing and expanding mandatory reporting for OTC derivatives transactions ("**Consultation Paper**") issued by the Hong Kong Monetary Authority ("HKMA") and the Securities and Futures Commission ("SFC") on 30 September 2015. This response covers Question 39 of the Consultation Paper, specifically around the data fields set out in the tables in Appendix D.

Since 1985, ISDA has worked to make the global derivatives markets safer and more efficient. Today, ISDA has over 850 member institutions from 68 countries. These members include a broad range of derivatives market participants including corporations, investment managers, government and supranational entities, insurance companies, energy and commodities firms, and international and regional banks. In addition to market participants, members also include key components of the derivatives market infrastructure including exchanges, intermediaries, clearing houses and repositories, as well as law firms, accounting firms and other service providers. Information about ISDA and its activities is available on the ISDA's web site: www.isda.org.

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ISDA is actively engaged with providing input on regulatory proposals in the United States, Canada, the European Union and across the Asia-Pacific region. Our response is derived from this international experience and dialogue in addition to consultation with our members operating in the Asia-Pacific region. We hope to assist the HKMA and the SFC in developing a mandatory reporting regime for Hong Kong in a manner which achieves your policy objectives and is in alignment with the regimes being introduced in comparable leading financial centres. In this respect, and as noted in ISDA's previous submissions¹, we reiterate the importance of cross-border regulatory harmonization, and strongly encourage the HKMA and the SFC to adopt a trade reporting regime that is, to the maximum extent possible, aligned with similar regimes in other jurisdictions, especially in major Asia-Pacific jurisdictions (such as Singapore) to minimize undesirable regulatory outcomes that threaten the efficient functioning of markets and businesses.

As noted in ISDA's white paper entitled "Improving Regulatory Transparency of Global Derivatives Market: Key Principles"², one of the key principles for improving regulatory transparency in a meaningful way is the harmonisation of regulatory reporting requirements for derivative transactions within and across borders. We note that the task of regulators to monitor the positions of globally-active institutions across jurisdictions cannot be efficiently achieved when bespoke, jurisdiction-specific data reporting and/or formatting requirements exist. At a time when all major jurisdictions across the globe are focussing on harmonising their data reporting requirements to achieve one global data set, it would not be in the interest of the Hong Kong regulators to impose unique requirements on their market participants.

For these reasons, any regulator should be able to clearly demonstrate the regulatory purpose of a particular data field requirement, and how it would be aggregated in a way that supports this purpose. We do not consider that simply having the functionality to support a particular data field is in of itself a regulatory purpose – rather, a data field requirement should meaningfully and efficiently contribute to achieving the objectives of systemic risk reduction and/or market abuse. Additionally, any data field requirement should be able to be justified through a thorough and comprehensive cost-benefit analysis which is able to demonstrate that the regulatory benefit gained from such a data field outweighs the cost, resourcing and effort required from the industry to implement it.

¹ ISDA comment letters to the HKMA and the SFC dated 18 August 2014 and 23 December 2014.

² <http://www2.isda.org/attachment/Nzi4NQ==/Improving%20Regulatory%20Transparency%20FINAL.pdf>

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We also wish to note the global efforts that ISDA is undertaking to develop standardised reporting practices and processes that will ultimately yield a more consistent data set for regulators to use. In particular, we highlight ISDA's ongoing efforts to establish standards for identifiers (for transactions and products), its work around other data elements and the industry standard language, Financial Products Markup Language (FpML). We believe that Hong Kong regulators should embrace and adopt the use of such standards in their design of the expanded reporting regime.

We are appreciative of the opportunity to provide input on the proposals contained in the Consultation Paper and we hope to have continued dialogue between the industry and the HKMA and the SFC to work together to develop best practices and to address any implementation issues that may arise from the proposals set out in the Consultation Paper. We note that we have recently requested the establishment of a working group between the regulators and industry, to address such issues in a forum which promotes constructive and meaningful two-way dialogue. Indeed we foresee a heightened need for such a working group to be established in the lead-up to both Phase 1 and Phase 2 reporting. We also consider that it would be valuable to have an ongoing post-consultation dialogue about existing market practices and standards for the reporting of many of the data fields being consulted on.

This letter ("**Response**") sets out our comments in relation to the specific questions posed in Question 39 of the Consultation Paper. While our members have sought to form a consensus on the questions raised under the Consultation Paper, there are certain issues on which individual members may have their own views. This Response represents the majority view of the industry on the issues covered by the Consultation Paper, and certain members may provide their comments to the HKMA and the SFC independently. Terms defined or given a particular construction in the Consultation Paper have the same meaning in this Response unless a contrary indication appears.

We look forward to continuing our dialogue with you. Please do not hesitate to contact
further. to discuss

Yours faithfully,

For the International Swaps and Derivatives Association, Inc.

RESPONSE TO QUESTION 39 – GENERAL COMMENTS

Some of our members aim to use DTCC as a reporting agent to undertake transaction reporting for Hong Kong reporting. For fields that the regulators have prescribed in their document, we kindly request that the regulators liaise with DTCC to map or reconcile with existing DTCC GTR transaction reporting fields, or otherwise co- create new corresponding transaction reporting fields.

Members have also raised significant concerns about what products are subject to mandatory reporting and under which asset classes such products are classified. We strongly recommend that all reportable products and their respective asset classes be listed and published, based on the ISDA taxonomies³. These taxonomies have benefitted from broad, comprehensive input from industry stakeholders and a thorough governance process to develop a standard that can be leveraged globally. Furthermore, the industry considers that it is very important for the types of reportable transactions to match those already mandated for reporting under EMIR. This is critical to facilitate global harmonisation and sharing of information between regulators, which the industry understands to be one of the central aims of mandatory reporting of OTC derivatives.

We also highlight here that the requirement to upload a PDF file for information that cannot be captured by the data templates is complex and bespoke. Our members have advised that this is not required in other Asia-Pacific jurisdictions, and note that this will not assist in data aggregation or position monitoring. In view of the extreme operational complexity and lack of meaningful regulatory benefit, this requirement should be removed.

A further point to note is that examples of how the data fields are to be filled in have not been made available (yet current market practices exist for the reporting of many of these data fields), and guidance has not been provided about whether each of the proposed data fields is required, conditionally required or optional. In view of recent industry discussions which saw different interpretations and understanding of the requirements, we think this should be made very clear in subsequent documentation, and should be subject to a feedback process with the industry. We reiterate that to minimise the number of unmatched transactions in the HKTR and avoid unnecessary operational burden, the authorities should not seek to match trades on non-required fields, and should also be aware of which fields are less likely to match and

³ The ISDA OTC Derivatives Products Taxonomies can be found at <http://www2.isda.org/functional-areas/technology-infrastructure/data-and-reporting/identifiers/upi-and-taxonomies/>.

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factor this into HKTR system design.

We would like to restate that the best way to achieve an optimal reporting regime is to consult with industry and engage in a two-way dialogue that results in a solution that is workable for all stakeholders. In particular, we would strongly encourage the authorities to consult in the following areas before finalising any requirements:

- Any changes to the directions and instructions for the use of the electronic reporting system and the submission of the transaction information for a specified OTC derivative transaction by means of the system;
- The proposed data fields to be included under Category 14 in Schedule 1 of the Reporting Rules;
- Any changes to the Frequently Asked Questions, Supplementary Reporting Instructions or AIDG; and
- Any proposed changes to data field requirements.

Given the depth of comments regarding data fields in this and other responses to this consultation, we suggest that the most efficient way to arrive at an agreed data set would be to have regular meetings and calls with the industry over the coming months to discuss each of the proposed data fields. This could be split out into meetings on the set of common data fields, and meetings for the data fields per asset class. As a general comment, we request HKMA to provide the industry with the HKTR upload templates for the Phase 2 data fields (like the one in the AIDG for phase 1 reporting). This would help the industry to better understand the requirements and expected values for each reporting field.

Our members also note that certain data fields have been proposed that can be derived from other data fields, reducing their necessity. Such fields include, but may not be limited to:

- Full Termination Indicator;
- File Reference;
- Asset Class;
- Product Taxonomy;
- Purpose;
- Number of Trade Event Requests;
- Product Taxonomy;

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- OTC Derivatives Product Taxonomy;
- Industrial Sector and Counterparty Industrial Sector;
- Clearing Exemption;
- Backloading Date;
- Trade Reference; and
- Unique Transaction Identifier (UTI) Indicator.

Further, we note that for a number of fields, we suggest that the code that is used in these data fields mirrors existing identifier waterfalls in use globally, with the LEI at the top of the identifier hierarchy followed by the SWIFT BIC. Such fields include, but are not limited to:

- Execution Agent;
- Clearing Broker;
- Confirmation Platform ID;
- Reporting For;
- Submitting Party;
- Reporting Party;
- Exchanged Currency 1 and 2;
- Option Buyer and Option Seller;
- Buyer and Seller; and
- Premium Payer.

We also note that many of the names of proposed data fields do not seem to correlate to their description or their purpose, which has caused confusion for a number of our members. We suggest a comprehensive review of all the data fields by the authorities, with the aim of aligning the names of data fields as closely as possible to match what they intend to capture. As an example, the data field name 'Special Terms Indicator' does not suggest that it intends to capture whether the transaction is subject to a clearing mandate. Similarly, a number of members have been confused about the data field names 'UTI', 'UTI-TID' and 'Bilateral Comments'.

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Lastly, we draw your attention to the joint response by ISDA, the Investment Industry Association (“IIF”) and the Global Foreign Exchange Division (“GFXD”) of the Global Financial Markets Association (“GFMA”) to the CPMI-IOSCO Consultative Report on the Harmonisation of Key OTC Derivatives Data Elements (Other than UTI and UPI) – First Batch (“ODE”).⁴ This consultation, and the joint trade associations’ response, are critical steps in the movement toward globally regulatory alignment of reported data. The associations are strong proponents of global data harmonization, individually and collectively working in tandem with their members and other buy- and sell-side market participants and market infrastructure providers to promote the important role of global standards in improving data quality and increasing the efficiency and value of reporting and other global regulatory requirements. ISDA believes that the comments contained in the response are of significant importance in the HK authorities’ design of data fields for reporting, and therefore we encourage the maximum possible alignment with our comments in that response.

⁴ Available at <http://www2.isda.org/functional-areas/technology-infrastructure/data-and-reporting/responses/>

RESPONSE TO QUESTION 39 – COMMENTS ON SPECIFIC DATA FIELDS

DATA FIELDS COMMON TO ALL ASSET CLASSES

1. DATA FIELDS: EVENT REQUEST ID, AGENT EVENT REFERENCE, USER EVENT REFERENCE

We do not consider that assigning a unique identifier to a trade event request is necessary and do not believe this is required in other jurisdictions. This can be inferred from the UTI, Trade Event and other related data fields.

2. DATA FIELDS: VERSION

It is unclear what this data field is intended to capture, and questionable as to what regulatory benefit it would provide.

3. DATA FIELDS: FILE REFERENCE, PURPOSE

Please provide further information on what these data field are intended to capture, and what regulatory benefit they would provide, as the descriptions are not clear. We understand that this is not required in other jurisdictions.

4. DATA FIELDS: NUMBER OF TRADE EVENT REQUESTS

We understand that this information can be obtained by the authorities directly through the HKTR. We request reconsideration as to whether this should be a required data field.

5. DATA FIELD: OTC DERIVATIVES PRODUCT TAXONOMY

Please explain the definition of Exotic Products. We otherwise submit that any definition should be harmonised globally.

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6. **DATA FIELDS: TRADE PARTY 1 AND 2 (PARTY NAME, PLACE OF INCORPORATION, INDUSTRIAL SECTOR, COUNTERPARTY INDUSTRIAL SECTOR)**

Since there is existing reporting of LEI (at both entity and counterparty levels), we request that these fields be removed where an LEI is provided. We note that for SEC reporting, these fields are not compulsory when the LEI is provided. Where an LEI is not provided, please clarify whether the ISO country code should be provided.

7. **DATA FIELD: COUNTERPARTY ORIGIN**

Please explain what the HKMA intends this field to capture, and what the regulatory benefit would be. We also suggest a renaming of the field.

8. **DATA FIELD: PRICE NOTATION (PRICE TYPE, PRICE)**

We kindly request that this field be limited to structured products. For equity swaps and portfolio swaps, the initial price can be reported. Similarly, the premium price can be reported where it relates to options.

9. **DATA FIELD: MASTER SUPPLEMENT DATE, DEFINITIONS TYPE**

Please clarify what is expected to be captured by this field. Does the HKMA foresee the reporting of MCA type and date and/or the applicable ISDA product definitions? We note that with respect to the product definitions, these are not reportable in any other APAC jurisdiction. Also, since there is primarily one version of such asset class definitions that is used by the industry at any given time, there is little value to distinguishing which version applies to a particular transaction.

10. **DATA FIELD: MASTER AGREEMENT (TYPE, VERSION, DATE)**

We do not foresee any regulatory aggregation benefit from this requirement.

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11. DATA FIELD: EXECUTION TYPE

We request that the HKMA set up reporting of this information via a selection of defined fields. We also note that this field is not supported in FpML.

12. DATA FIELD: NOTIONAL (CURRENCY)

We request HKMA aligns with recommendations made on this point in the previous ISDA submission to the IOSCO ODE consultation paper. See section G (Notional Currency 3.1.7) of the ISDA submission. We further note that exotic products may have more than 2 legs.

13. DATA FIELDS: INFORMATION AND PARTICULARS RELATING TO THE CLEARING OF THE TRANSACTION

We request HKMA aligns with recommendations made on this point in the previous ISDA submission to the IOSCO ODE consultation paper. See section C (Cleared 3.1.3) of the ISDA submission.

14. DATA FIELDS: CENTRAL COUNTERPARTY ID

We suggest that the code that is used in this data field mirrors existing identifier waterfalls in use globally, with the LEI at the top of the identifier hierarchy followed by the SWIFT BIC.

15. DATA FIELD: USER TRADE REFERENCE

We consider that the information that this data field seeks to correlate can be achieved through the UTI and other related data fields.

16. DATA FIELD: REMARKS 1

Please see our earlier remarks on this data field. We reiterate that PDFs cannot be aggregated and will not assist in market monitoring or risk analysis.

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17. DATA FIELD: CP TRADE REFERENCE

We consider that the name of this field is confusing, as ‘CP’ typically refers to the word ‘counterparty’. We suggest renaming this field to ‘Platform Trade Reference’ or similar.

18. DATA FIELD: OPTION STYLE

We note that there are a number of different option styles which do not seem to be contemplated in the consultation (eg; Bermudan).

19. DATA FIELD: UPI

We note that CPMI-IOSCO is shortly expected to consult on harmonised requirements and recommendations for a Unique Product Identifier. We commend the work being undertaken at the global level in this respect, and would strongly encourage the regulators to align the local requirements and implementation timing with global outcomes. We also note ISDA’s efforts with the industry on developing identifiers for products.

20. DATA FIELD: REFERENCE BRANCH OF TRADE PARTY

We note that the LEI ROC has recently completed consultation on including data on branches in the global LEI system. ISDA, along with the Global Financial Markets Association (GFMA), the Investment Industry Association of Canada and the Institute of International Finance (IIF) have submitted a response to this consultation, which we strongly encourage the authorities to refer to. ⁵ In particular, we note our recommendations around a standard for branch identification (including possible use of the ISO 3166 2-digit country code), our strong urge for regulatory bodies to use the authoritative branch identifier as promulgated in final rules and guidance, and our hope that it would be possible for implementation of branch identifiers to be done in

⁵ http://www2.isda.org/attachment/ODAyOQ==/LEI%20ROC_Foreign%20Branch%20CP_Assoc%20FINAL.pdf

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time for upcoming requirements, including the 10 July 2016 date in Hong Kong. We restate our strong support for the development of a single, global standard to identify international branches, and strongly encourage the Hong Kong regulatory authorities to align with the global standard recommended by the LEI ROC.

21. **DATA FIELD: VALUATION REQUEST ID**

We request clarification from HKMA on this field requirement. We are unable to see the regulatory benefit of assigning a unique ID to each valuation request.

22. **DATA FIELD: REMARKS 2 (EXOTIC TEMPLATE)**

We suggest renaming this field to 'Hybrid – Other asset class'.

23. **DATA FIELD: OTC DERIVATIVES PRODUCT TAXONOMY**

Please clarify the difference between this field and the field 'Unique Product Identifier (UPI): ID Value', and specify the expected value in these fields. Please also note our comments above.

24. **DATA FIELD: OPTION ENTITLEMENT**

We suggest that the HKMA provide some examples demonstrating how this field is to be completed.

25. **DATA FIELD: NUMBER OF OPTIONS**

We suggest that the HKMA provide some examples demonstrating how this field is to be completed.

26. **DATA FIELD: STRIKE PRICE (UNIT)**

We suggest that the HKMA provide some examples demonstrating how this field is to be completed.

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27. DATA FIELD: CLEARING EXEMPTION

We suggest that reporting entities only be required to complete this field from their own perspective and not their counterparty's.

28. DATA FIELD: FULL TERMINATION INDICATOR

Our members have advised that this is not a requirement in other jurisdictions, and we also note that the purpose of this data field can be derived from other data fields.

29. DATA FIELD: TRADE REFERENCE

We consider that the purpose of this data field will be served through the use of the UTI data fields, and hence is not required.

RATES

30. DATA FIELD: SETTLEMENT METHOD

We request HKMA aligns with recommendations made on this point in the previous ISDA submission to the IOSCO ODE consultation paper. See section D (Settlement Method 3.1.4) of the ISDA submission.

31. DATA FIELD: UNDERLYING ASSET

Please clarify whether HKMA will provide a list of indices, and if so provide information on the maintenance process to ensure these are kept up to date.

32. DATA FIELD: NOTIONAL UNITS

Our members have advised that this is more applicable to equity and commodity derivatives than rates derivatives. We also note HKMA's alignment with

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recommendations made on this point in relation to commodities in the previous ISDA submission to the IOSCO ODE consultation paper (see section F. Notional Amount §3.1.6 of the ISDA submission).

FX

33. **DATA FIELDS: EXECUTION PERIOD START DATE, EXECUTION PERIOD END DATE**

We request more information and definition around these data fields. In relation to the Execution Period End Date, please also see section B. End Date §3.1.2 of the ISDA submission to the IOSCO ODE consultation paper.

34. **DATA FIELD: EFFECTIVE DATE (UNADJUSTED DATE)**

One of our members has noted that these are not terms commonly used in FX products, and would like clarification on whether this refers to the trade date. Please also see section A. Effective Date §3.1.1 of the ISDA submission to the IOSCO ODE consultation paper.

35. **DATA FIELD: BUYER**

We note that for some products (such as Target Accumulator Redemption Forwards and Knock-Out Forwards), the buyer and seller may change. Please provide clarification on how these types of trades should be reported in this data field. For FX swaps, there is not an actual buyer or seller, and we do not believe that one should be artificially defined. Please also see section J. Direction §3.2.2 of the ISDA submission to the IOSCO ODE consultation paper.

36. **DATA FIELD: STRIKE PRICE – QUOTED CURRENCY PAIR BASIS**

Please advise how to report the strike prices for basket options with multiple strike prices.

37. **DATA FIELD: STRIKE PRICE – FX DELIVERY TYPE**

We request that HKMA aligns with recommendations made on this point in the previous ISDA submission to the IOSCO ODE consultation paper. See section D (Settlement Method 3.1.4) of the ISDA submission. In accordance with current market practice, we believe that consistent values should be used for the FX Delivery Type as would be used for the Settlement Method for other asset classes.

38. **DATA FIELD: NOTIONAL (-LEG 1, -LEG 2)**

Please advise how to complete this data field for trades with more than 2 legs.

39. **DATA FIELDS: MULTIPLE EXERCISE MINIMUM, MULTIPLE EXERCISE MAXIMUM (CURRENCY, AMOUNT)**

Our members have advised that this is a non-standard booking parameter that is not required in other jurisdictions. We request reconsideration of whether this data field should be required.

40. **DATA FIELD: (ASIAN) RATE SOURCE**

We understand that this is not required in other reporting regimes in other jurisdictions. Please provide examples of possible values for this data field.

41. **DATA FIELD: OBSERVATION FREQUENCY**

Please provide examples of possible values for this data field.

42. **DATA FIELD: OBSERVATION RATE QUOTE BASIS**

Please consider whether this should be split into separate data fields for Currency 1 and Currency 2, and provide examples of possible values.

43. **DATA FIELDS: TOUCH CONDITION, TOUCH DIRECTION, TRIGGER**

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CONDITION, DIGITAL OPTION PAYOUT (STYLE)

Please consider whether this should be split into separate data fields for Currency 1 and Currency 2, and provide examples of possible values.

44. DATA FIELD: NOTIONAL SCHEDULE (STEP DATE, STEP VALUE)

We suggest providing examples to demonstrate how this data field should be completed.

EQUITIES

45. DATA FIELD: UNDERLYING ASSET (EXCHANGE ID, OPEN UNIT, PLACE OF INCORPORATION)

We request that these fields not be required when a RIC is submitted or if the underlying asset is identified by the UPI. We note that SEC transaction reporting only requests the reporting of this field when a product identifier is not submitted that provides this information.

46. DATA FIELD: SPECIAL DIVIDENDS, MATERIAL NON-CASH DIVIDEND

Please clarify if this field refers to dividends or corporate action events that occur on the underlying of an equity swap.

47. DATA FIELD: TYPE OF RETURN (-EQUITY SWAP, -VARIANCE SWAP)

We submit that this field should reflect either the Total Return or Price Return Swap. Additional guidance is needed on how this field should be populated.

48. DATA FIELD: SETTLEMENT METHOD

We request HKMA aligns with recommendations made on this point in the previous ISDA submission to the IOSCO ODE consultation paper. See section D (Settlement Method 3.1.4) of the ISDA submission.

49. DATA FIELDS: DIVIDEND LEG TERMINATION DATE AND FIXED LEG TERMINATION DATE

One of our members has advised that there should be 2 additional fields, to specify the effective date for the dividend leg and the fixed leg.

50. DATA FIELD: NOTIONAL (CURRENCY)

We suggest renaming this field to 'Options Notional' or similar.

51. DATA FIELD: NOTIONAL AMOUNT (CURRENCY)

We suggest renaming this field to 'Dividends Notional' or similar. We also request that HKMA aligns with recommendations made on this point in the previous ISDA submission to the IOSCO ODE consultation paper. See section G (Notional Currency 3.1.7) of the ISDA submission.

52. DATA FIELDS: REMARKS 1 (STANDARD TEMPLATE) AND REMARKS 2 (STANDARD TEMPLATE)

We suggest renaming these fields to 'Leg 1 – Observation Date Occurrence' and 'Leg 2 – Observation Date Occurrence' or similar.

53. DATA FIELD: SETTLEMENT METHOD

We request that HKMA aligns with recommendations made on this point in the previous ISDA submission to the IOSCO ODE consultation paper. See section D (Settlement Method 3.1.4) of the ISDA submission.

54. DATA FIELDS: VOLATILITY STRIKE PRICE AND VARIANCE STRIKE PRICE

We suggest renaming these fields to 'Vanilla Volatility Strike Price' and 'Vanilla Variance Strike Price' respectively, or similar.

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55. DATA FIELDS: VOLATILITY STRIKE PRICE (CURRENCY) AND VARIANCE STRIKE PRICE (CURRENCY)

We suggest renaming these fields to 'Exotic Volatility Strike Price' and 'Exotic Variance Strike Price' respectively, or similar.

CREDIT

56. DATA FIELD: INITIAL PAYMENT DATE

Please clarify whether this is equivalent to the principal or the upfront fee (similar to an option).

57. DATA FIELDS: SINGLE PAYMENT (CURRENCY, AMOUNT)

Please clarify whether this relates to a single coupon payment.

58. DATA FIELDS: KNOWN AMOUNT (CURRENCY, AMOUNT) AND KNOWN AMOUNT – LEG 1, LEG 2 (CURRENCY, AMOUNT)

Please clarify whether this data field relates to the coupon at settlement.

59. DATA FIELDS: EMBEDDED OPTION ON SWAP

We suggest the HKMA provide a list of values that can be submitted for this data field.

60. DATA FIELDS: NTH TO DEFAULT, MTH TO DEFAULT

We suggest that the HKMA provide some examples demonstrating how this field is to be completed.

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61. DATA FIELDS: INDEX REFERENCE INFORMATION (INDEX ID)

Please provide further information and examples on how this data field is to be completed.

COMMODITY

62. DATA FIELD: EFFECTIVE DATE (UNADJUSTED DATE)

One of our members has noted that these are not terms commonly used in commodity products, and would like clarification on whether this refers to the trade date. Please also see section A. Effective Date §3.1.1 of the ISDA submission to the IOSCO ODE consultation paper.

63. DATA FIELD: TERMINATION DATE (UNADJUSTED DATE)

We would like clarification on whether this refers to the date that the trade was terminated, or the final settlement date.

64. DATA FIELD: BUYER

We note that for some products, the buyer and seller may change. Please provide clarification on how these types of trades should be reported in this data field.

65. DATA FIELD: COMMODITY EXCHANGE ID

We note that not all commodity derivatives may have an exchange ID.

66. DATA FIELD: GRADE

Where the Commodity Reference Price is used to identify the underlying asset, this field should not be required to be reported.

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67. DATA FIELD: PRICE NOTATION (MEASURE TYPE)

Please provide examples of possible values for this data field.

68. DATA FIELD: NOTIONAL (LEG 1, LEG 2)

Please advise how trades with more than 2 legs should be reported. We also note HKMA's alignment with recommendations made on this point in relation to commodities in the previous ISDA submission to the IOSCO ODE consultation paper (see section F. Notional Amount §3.1.6 of the ISDA submission).

69. DATA FIELD: NOTIONAL QUANTITY SCHEDULE (STEP UNIT)

Please provide examples of possible values for this data field, and confirm whether this data field is intended to represent amortizing notionals.

70. DATA FIELDS: PHYSICAL QUANTITY SCHEDULE, OPTIONAL NOTIONAL QUANTITY SCHEDULE (STEP UNIT) AND FIXED PRICE SCHEDULE (STEP CURRENCY)

Please clarify the difference between 'step unit' and 'unit'.

71. DATA FIELDS: FIXED PRICE (CURRENCY) AND FIXED PRICE SCHEDULE (STEP CURRENCY)

Please clarify whether these data fields are intended to apply to block commodity swaps.

72. DATA FIELD: NOTIONAL QUANTITY SCHEDULE (STEP UNIT)

Please provide examples of possible values for this data field, and confirm whether this data field is intended to represent amortizing notionals.

73. DATA FIELD: OPTION FLOATING STRIKE PRICE PER UNIT SPREAD

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(CURRENCY, AMOUNT)

Please provide examples of possible values for this data field.

**74. DATA FIELD: OPTION FLOATING STRIKE PRICE PER UNIT SPREAD
(CURRENCY, AMOUNT)**

Please provide examples of possible values for this data field.

**75. DATA FIELD: OPTION FLOATING STRIKE PRICE PER UNIT SPREAD
SCHEDULE (STEP CURRENCY, STEP AMOUNT)**

Please provide examples of possible values for this data field.

**76. DATA FIELD: OPTION FLOATING STRIKE PRICE PER UNIT SPREAD
SCHEDULE (STEP CURRENCY, STEP AMOUNT)**

Please provide examples of possible values for this data field.

77. DATA FIELD: CALCULATION SPREAD (CURRENCY, AMOUNT)

Please provide examples of possible values for this data field.

78. DATA FIELD: CALCULATION SPREAD (CURRENCY, AMOUNT)

Please provide examples of possible values for this data field.

**79. DATA FIELD: CALCULATION SPREAD SCHEDULE (CURRENCY,
AMOUNT)**

Please provide examples of possible values for this data field.