

## Technical and Operations Consultation Paper Responses.

### Respondent 1

Under section 9 ('Availability'), I notice the following,

"The DSB is designed to be a global 24 x 7 system. However, given the initial focus of industry on European regulatory requirements, it may be possible to reduce start-up operating costs, and hence user fees, by focusing support around the European time zone. This will allow the DSB to delay incurring the extra cost for global support to when it is required by the industry.

The below are the proposed system availability hours for the DSB production environment."

What exact hours are being proposed here? I have a concern that this will limit trading on our European legal entities outside of regular hours of operation.

### Respondent 2

Regarding system availability detailed in section 9:

"Hours and days for which the system will be available. The start time will be Monday 0500 UTC and the end time will be Friday 2100 UTC. These have been proposed to maximize access from EMEA".

To accommodate trading activity out of Asia can the Monday start of availability be extended back to midnight Sunday night?

### Respondent 3

I have reviewed the Technology and Operations Consultation Paper 1 for Citibank FX technology

The only comment I would make is that there doesn't appear to be a "bulk creation" method. It is conceivable that it would be useful to have a bulk feature. Eg – take all yesterday's commonly traded option deltas/ currency pairs and request the new ISIN for the new common tenors (eg 1 week EUR/USD ATM, 2 week ATM). This would allow us to pre-fetch and cache typical ISINs at the start of day.

### Respondent 4

***Q16: As stated above, the DSB is initially planning to use two or more datacentres located in different countries in Europe. Do you have any specific objections or concerns with this approach? If so, please detail your points and provide evidence where possible.***

I feel it would be useful to have a datacenter in the US as well, as many banks will have some global systems running out of US.