No.	Question	Answer
1	Bearing in mind that the Day 1 implementation of the ISIN is intended to satisfy the MiFID II Reference data reporting requirements, whilst maintaining structural flexibility for implementation of additional levels in subsequent phases, are there any attributes in the SG2 table above that should be added to the Fixed Float Plain Vanilla Product Definition?	-
2	Do you agree that these attributes can be derived from the Input attributes?	-
3	Do you agree that these should be output by the ANNA DSB?	-
4	Is the derivation of the above attributes useful for industry? If so, would this impact the industry's implementation and overall ability to meet RTS23 deliverables?	We believe that it would be very useful to add the asset class and the sub-asset class to the response message. This would support the mapping of transactions to the terms that are used in RTS2, particularly to the liquidity classes that are defined in annex III of RTS 2. We would like to recommend that some thoughts will be given to whether the sub-asset class should be considered as a "derived attribute" or as a "flag", comparably to the ToTV-flag that is suggested by ANNA DSB. We assume that derived attributes are supposed to be constant for a given ISIN. The sub-asset class however may change over time for two reasons: (i) ESMA may update the RTS2, thereby restructuring the sub-asset classes and (ii) aging of a foreign exchange forward may lead to withdrawal of the sub-asset class: in our understanding a foreign exchange forward will be classified a FX spot transaction once time-to-maturity falls below the number of days that distinguishes spot and forward transaction for the respective currency. For both reasons we would suggest to treat the sub-asset class as a flag for a given ISIN - not as a derived attribute- as the sub-asset class might change over time. Based on this understanding the functionality could also be extended to delivering a flag containing the sub-class as per RTS2, e.g. the more granular level that uses segmentation criteria such as currency pair and time bands for time-to-maturity. The sub-class information would change over time as well, assuming that time-to-maturity refers to remaining time-to-maturity, not original time-to-maturity. Furthermore we would welcome additional information of ANNA DSB approach for providing those information for FX Swaps. Based on the information provided there is no ANNA DSB product template for FX Swaps (RTS 2: Deliverable FX Swap). We would assume that we´ll have to provide near and far leg of the Swap linked by a bundle/ package id to ANNA DSB. In return we would expect to receive the sub-asset class of RTS 2 "Deliverable FX Swap" and not "Deliverable FX Outright". Irrespective of the afore mentioned. the information on asset-, sub-asset and sub-class shall be provided for each requested instrument indepent of the obligation to report this instrument under MiFIR Art. 27 resp. RTS 23
5	Do you agree that the ANNA DSB should be designing the Product Definitions to align with the current thinking of CPMI IOSCO UPI requirements?	-
6	Are there additional fields that you believe need to be added in order to ensure the goal of supporting CPMI IOSCO are met?	-

7	Using the Fixed Float Plain Vanilla Product Definition as an example, are there other products in other asset classes where any additional SG2 Level 1 attributes outlined below should be added to the base RTS23 & CFI fields? In providing feedback, consideration should be given to any attributes that are relevant for CPMI-IOSCO's UPI.	We are not sure we understand the implications of adding information to the base RTS23 & CFI fields. We assume this shall refer to adding an item to the list of defining attributes. We would suggest that you explain the term "SG2" in the final report for this consultation, or perhaps abstain from using it. The readers of the report are not necessarily familiar with the genesis of ANNA DSB's activities, and probably don't have to be familiar with it in order to understand the report.
8	Do you believe that the Product Committee's proposal for the DSB to indicate ToTV/uTOTV would benefit the market? Please explain why	We believe that it would be very useful if ANNA DSB analyzed ESMA TOTV data and allocated a TOTV property to every derivatives ISIN. In real-time/near-time processing, this information could be used to determine whether an instrument is subject to pre/post trade transparency. In batch processing it could be used to determine on a daily basis whether an instrument is subject to transaction reporting and to SI determination. We would believe that data requests directed towards ANNA DSB will sharply increase when TOTV information is provided, with users not only requesting reference data "on the fly" in the trading process, but on a regular basis for the universe of their traded instruments. Providing the TOTV-attribute would, in our opinion, extend ANNA DSB's role from ISIN creation to provision of up-to-date reference data for existing ISIN's, which we would very welcome. Assuming that ISIN's will also be created by entities that are not obliged to fulfil RTS 23 requirements, we would recommend to bear in mind that the DSB's list of ISIN's will contain ISIN's that are not part of ESMA/FIRDS data.
9	Are there any other workflows in addition to the above that the DSB should accept or provide?	The two suggested workflows seem to be useful and sufficient. We suggest that the final report for this consultation clarifies why "a set of OTC ISINs" may be returned in response to a sent list of attributes. Our current assumption is that ANNA DSB demand input attributes which allow for unequivocal identification of a single ISIN.
10	Should the DSB also provide Liquidity/SSTI data in the response to users alongside the ToTV and uToTV flags?	We believe that it would be useful to add liquidity/SSTI data in the response to the user. Liquidity information is required for SI determination and for checks in pre/post trade transparency. SSTI information is required for checks in pre/post trade transparency as well. We would consider the allocation of a sub-asset class flag to an ISIN, see our reply to question 7, as a prerequisite for this to work, because liquidity and SSTI are defined on sub-asset class level.