Note

CHAPS Co

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To CPSS Secretariat
IOSCO Secretariat

Copy Bank of England Oversight

From Phil Kenworthy
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CPSS-IOSCO ASSESSMENT METHODOLOGY AND DISCLOSURE FRAMEWORK CONSULTATION

Following the publication of the *Principles for financial market infrastructures* (PFMI) report, CHAPS Clearing Company Limited ("CHAPS Co") appreciates the opportunity to comment on the CPSS-IOSCO consultative documents *Assessment methodology for the principles for FMIs and the responsibilities of authorities* and the *Disclosure framework for financial market infrastructures*.

CHAPS Co is the system operator of the UK's high value real-time CHAPS sterling payment scheme. The CHAPS scheme processes and settles both systemically important and time-dependent payments using an enhanced real-time gross settlement (RTGS) system, where each individual payment is settled in real-time across its members' settlement accounts at the Bank of England.

CHAPS Co response to the two CPSS-IOSCO consultative documents

A. Assessment Methodology

CHAPS Co supports the *Assessment methodology for the principles for FMIs and the responsibilities of authorities* as a means for authorities to be provided with a basic set of information using a common framework for assessment and disclosure from which to begin their assessments of FMIs. At an international CPSS-IOSCO level, CHAPS Co have no specific comments as to whether the assessment methodology is appropriately comprehensive, sufficiently clear, or includes an appropriate level of detail.

B. Disclosure Framework

CHAPS Co supports the *Disclosure framework for financial market infrastructures* as a means for assisting FMIs in providing the level of disclosure that is expected under Principle 23 in the PFMI Report. Whilst at an international CPSS-IOSCO level, CHAPS Co have no specific comments as to whether the disclosure framework is appropriately comprehensive, sufficiently clear, or includes an appropriate level of detail, we are of the opinion where a payment system spans across two or more FMIs, the overseeing authority should ensure that disclosure occurs in a co-ordinated manner.

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