

European Central Bank
DG-MIP/MID

60640 Frankfurt am Main
Germany

Your ref	Our ref	Date
	EBACL 170248	29 June 2017

Classification: Choose an item.

Re. EBA CLEARING reply to market consultation on the future RTGS services

Dear Madam, Dear Sir,

EBA CLEARING welcomes the opportunity to reply to the public consultation on the future RTGS services as part of the T2-T2S consolidation project.

The Company in its role of Ancillary System operator, i.e. operator of two SIPS and an ORPS, has provided its comments in the suggested excel sheets. In addition, EBA CLEARING wishes to highlight the following:

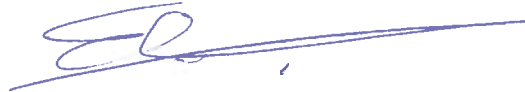
1. It is of the utmost importance that changes to the Ancillary System Interface are made in a transparent way and that the Eurosystem details any impact from such changes. Changes to the AS Interface will require Ancillary Systems to align in technical, functional, operational and legal aspects. Necessary changes in the AS will come at a cost for the industry as a whole, which should be justified by the benefits of the changes in both the RTGS and Ancillary systems.
2. The Eurosystem in its role of provider of the infrastructure should ensure that features in the future RTGS are available to all systems and their operators alike are and, further, that they thus ensure a level-playing field.

3. Finally, the Company has previously raised a number of change requests with regards to the Ancillary System Interface as well as the RTGS Contingency module that the Company would expect the Eurosystem to take into account in the development of the consolidated Eurosystem platform. These change requests have been included in our response to this consultation once more.

Yours faithfully,



*Hays Littlejohn
Chief Executive Officer*



*Erwin Kulk
Head of Service Development and
Management*