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To: All EU Co-legislators

3rd October 2016

Dear Sir

**RE: Simple Transparent and Standardised Securitisation Regulation ('STS Regulation')¹
Transparency and Disclosure Arrangements under Article 5**

List of CC'd recipients: European Commission, European Parliament, Council of the European Union, European Securities and Markets Authority, European Banking Authority, European Central Bank.

Why this list? Because, on this topic of transparency and disclosure, the requirements of regulators, legislators and central banks overlap. The Market needs close coordination to prevent multiple, over-burdensome or conflicting versions of detailed regulations that are essentially intended to achieve identical or similar purpose.

If I've missed anyone, please let me know.

I've spoken to most of you - or colleagues working directly with you - at some point.

Please see the publicly (Google) hosted: '[STS Transparency Objectives and Options](#)'². This document is a culmination of the pooling of ideas for the implementation of Article 5. It has been compiled from a variety of sources such as publicly released papers and amended STS Regulation drafts and meetings and conversations with and suggestions from regulators, trade associations and the market generally. The also enclosed/attached '**How STS Article 5 Could Work in Practice**' has specific focus on what EuroABS believes is a workable compromise.

EuroABS Background and Experience

In addition to our staff having many decades of banking industry experience EuroABS has 16 years of field experience and providing services to European ABS market participants and suppliers including:

- Comprehensive database of publicly available data, reports and documentation
- Investment portfolio valuation
- Secure hosting of data and documentation
- Loan level data quality and continuity checking
- Loan level data versus contemporary investor report reconciliation
- Liabilities waterfall model production


EuroABS has no direct trading interest in these ABS Markets. EuroABS is 100% independently owned and funded. EuroABS is a unique witness in the STS debate.

EuroABS has worked closely with dozens of ABS issuers to help them successfully achieve Bank of England eligibility. The Bank of England *eligible collateral* model with regard to transparency requirements is materially very similar to STS. It has been field-tested since 2011. To-date, 98 issues have complied with the requirements and there have been no reports of any legal disputes.

¹ <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2015%3A472%3AFIN>

² <https://docs.google.com/document/d/1NimrYSLnbPguTKiPbBsOluSvY53PgDTHkoJtSjv7gCs/>

List of additional associated documents that can be found [here](#) and individually as below:

- [How STS Article 5 Could Work in Practice - European Securitisation Data Repository \(ESDR\) Compromise Option](#) (also attached here)
- [13th September 2016 Letter to European Parliament Econ Committee](#) – 
STS Article 5 Letter)
- [Securitisation - Importance of Issuer Provided Liabilities Waterfall Models](#)
- [January 2016 – EuroABS Recommendations to European Commission on STS Article 5](#)
- [EuroABS STS Regulation Recommended Draft Changes](#)
- [STS Transparency Objectives and Options](#)

I would be very happy to organise a presentation, meeting, call, webinar, etc. to discuss these matters should this be of interest.

Yours sincerely

