

August 07, 2013

Macroeconomic Surveillance Department
Monetary Authority of Singapore
10 Shenton Way
MAS Building
Singapore 079117
kennethgay@mas.gov.sg

Dear Sir

Feedback on the data fields in Schedule 2 of the Consultation Paper on Draft Regulations Pursuant to the Securities and Futures Act for Reporting of Derivatives Contracts

1. **Introduction:** The International Swaps and Derivatives Association, Inc. (“**ISDA**”)¹ is grateful for the opportunity to provide further comments on the data fields in Schedule 2 of the consultation paper on Draft Regulations Pursuant to the Securities and Futures Act for Reporting of Derivatives Contracts (“the **Consultation Paper**”) released by the Monetary Authority of Singapore (“**MAS**”) on June 26, 2013. Individual members will have their own views and may have provided their comments to MAS independently.

2. **Reporting of data fields in Schedule 2:**

2.1 As you are aware, the reporting commencement date of October 31, 2013 provides a very short timeframe for the industry to meet their reporting obligations. As we have suggested in our previous submission, we would like to request that only the mandatory CFTC data fields be reportable for the initial phase. For the data fields that are optional CFTC data fields, we would like to request these data fields be deferred to a later date. For the data fields that are not currently reportable under the CFTC, we would also request that these data fields be deferred to a later date.

2.2 We have focused our responses predominantly on the data fields in Schedule 2 and on the credit derivative and rates derivatives asset types as these were the two asset types that will be reportable in the initial phase.

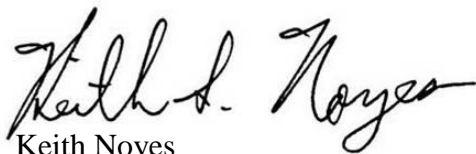
¹ISDA’s mission is to foster safe and efficient derivatives markets to facilitate effective risk management for all users of derivative products. ISDA has more than 800 members from 58 countries on six continents. These members include a broad range of OTC derivatives market participants: global, international and regional banks, asset managers, energy and commodities firms, government and supranational entities, insurers and diversified financial institutions, corporations, law firms, exchanges, clearinghouses and other service providers. For more information, visit www.isda.org.

2.3 For ease of review, we have listed our comments in Attachment 1.

ISDA appreciates the opportunity to provide further comments on the Schedule 2 of the proposed trade reporting regime in the Consultation Paper. If you have any questions on this submission, please contact Cindy Leiw (cleiw@isda.org, +65 6538 3879) at your convenience.

Yours faithfully,

For the International Swaps and Derivatives Association, Inc.



Keith Noyes
Regional Director, Asia Pacific



Cindy Leiw
Director of Policy