

## Part A General Information of the Respondent

All fields are mandatory, except the fields with an asterisk (\*) if you are an individual respondent.

<b>Name/ Company Name*</b>	:	Citibank N.A.
<b>Contact Person*</b>	:	
<b>Title*</b>	:	
<b>Phone Number</b>	:	
<b>E-mail Address</b>	:	

If you **do not wish** to disclose the above information to the public, please check the box here:

I do not wish to disclose the information above.

**Part B Consultation Questions**

Please indicate your preference by providing comments as appropriate. Where there is insufficient space, please attach additional pages as necessary.

Question 1: Do you support the implementation of the proposed T+2 Finality arrangement? If not, what are the reasons?

Yes, we are in principle supportive to this proposal.

Question 2: Do you envisage any problems or concerns for you or your company to operate under the proposed T+2 Finality arrangement? If yes, what are the problems and how can the arrangement be refined to help address your problems?

1. Our major concern is the tight processing window (only 1 hour turnaround time) for both cash posting and credit checking. By using the money settlement instructions which sent from HKICL at around 4:35 p.m., we are not able to meet the cutoff time i.e 5:20pm. Alternatively, we might be able to meet the cutoff if the money settlement instructions which downloaded from CCASS (available at 4:20pm) are in the same format as HKICL's existing file format. In addition to the minimum summary details with aggregate DDI/DCI & aggregate debit/credit EPI and cash collateral and net amount per participant and per designated bank.

2. For the rejected items, how do we input via CCASS? What is the final workflow? Due to the tight turnaround time, we suggest to have selection criteria for both individual rejection & bulk rejection and file upload function (the file will be similar to that downloaded from CCASS).

3. HKICL will send the messages to inform designated banks of the completion of settlement run at around 6:00pm. We suggest to receive the same broadcast via CCASS terminal

4. For any items being rejected by counterpart, how do HKSCC communicate with designated banks? We suggest to receive the info via text format and/or same file layout with CCASS download file via CCASS terminal in addition to the notification from HKICL and a summary report.

**Question 3:** What is the estimated lead time required by you or your company to prepare for the implementation of the proposed T+2 Finality arrangement? What are the major preparations required?

If CCASS's money settlement instructions are same as the existing HKICL's file format, the estimated lead time required by us to prepare for the implementation is about 3 -4 months. The major preparations are system enhancement, and stimulation/stress/end-end testing. However, it also be subject to the final flow of the processing as how to process a large number of return items from designated bank with such tight processing window. Please clarify whether cash collateral included into this additional bulk settlement or not and provide the details of this collateral.

**Question 4:** Do you have any other comments in relation to the introduction of a T+2 Finality arrangement for CCASS money settlement?

The last resort is to extend the processing window.

- End -