SECTION 2: QUESTIONS FOR RESPONSE

Please indicate your views by providing comments as appropriate. Where there is insufficient space, please use additional sheets of paper as necessary.

HKEx's Proposal 1: Revise HKEx Stress Testing Assumptions

Questions			
in str	you support the proposed revision of the Price Movement assumptions ress testing? Yes No Comment No Please provide reasons for your response and include any other suggestions or comments you may have on this question:		
	Do you support the proposed revision of the Counterparty Default assumption in stress testing?		
	Yes		
	No		
	Please provide reasons for your response and include any other suggestions or comments you may have on this question: - We suggest the assumption should be tailor-made and based on individual CP's total exposures on market shares (i.e. by category), with different risk weights for different category of securities, and financial strength.		
	Do y		

HKEx's Proposal 2: Introduce Margining and Dynamic Guarantee Fund in HKSCC

Questions			
3. D	o you agree with the proposed margining arrangements at HKSCC?		
	Please refer to comment below		
	No S rease refer to comment below		
	Please provide reasons for your response and include any other suggestions or comments you may have on this question:		
	 Since the proposal would have substantial impact on CPs' working capital and liquidity and even the whole industry, a prudent phase by phase implementation is recommended. 		
	2) As the proposed arrangement requires margin be payable in the denominated currency of the CNS position, CPs may find it difficult to raise fund in currencies other than HK dollar. We suggest HK dollars be used for collection of margin, rather than other currencies.		
	3) Bank guarantee (by Mother Company) should be allowed as a form of margin payment.		
4. D	o you agree with the proposed Dynamic GF model at HKSCC?		
	Yes		
	Yes Please refer to comment below No		
	Please provide reasons for your response and include any other suggestions or comments you may have on this question:		
	 A prudent phase by phase implementation is suggested as the proposal would have substantial impact on CPs' working capital and liquidity. 		
	 In case SFC does not allow CPs' contribution to GF be classified as liquid capital under FRR rule, CPs will have to raise more capital to meet the requirement. 		

HKEx's Proposal 3: Revise HKCC Reserve Fund Calculation

Questi	Questions		
	o you support the proposed revisions to the HKCC Collateral assumption? Yes N/A No Please provide reasons for your response and include any other suggestions or comments you may have on this question: - N/A		
of	o you support the use of HKCC Contingent Advance in relieving burden FCPs? Yes N/A No Please provide reasons for your response and include any other suggestions or comments you may have on this question: - N/A		
ca	That is your view on allowing RF contribution to be counted as liquid upital? Will this help your company in terms of reducing liquid capital unding burden? - N/A		

HKEx's Proposal 4: Revise SEOCH Reserve Fund Calculation

Questions					
8.		you support the proposed revisions to the SEOCH Collateral amption?			
		Yes No N/A			
		No			
		Please provide reasons for your response and include any other suggestions or comments you may have on this question: - N/A			