The Af2i, Association Française de Investisseurs Institutionnels, answers the CESR CP about :

The guidance on the enforcement practices and activities to be conducted under article 21.3(a) of the regulation

The Af2i welcomes the CESR initiatives aiming to improve the level of enforcement and supervision of the CRAs activities .

Q1 : The Af2i agrees with the approach of guidelines as it is outlined in section 3 of the present CP . We do insist on the qualitative information about the rating policy and on the disclosure procedures of the ratings to the markets .

Q2 : The Af2i agrees with the approach outlined in section 4 of this present CP . We wish to stress on the meetings with the managers of the CRA and the directors , after reading the board minutes and as the same time as the credit risk officer . We do think that all the members of the board should be responsible for the ratings of the CRA .