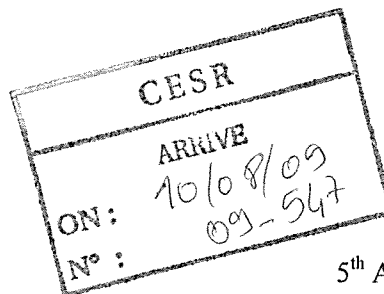


Feri EuroRating Services AG · Postfach 1454 · 61284 Bad Homburg

CESR  
The Committee of European  
Securities Regulators  
Att. Mr. Caspari  
11-13 avenue de Friedland  
75008 Paris  
France



5<sup>th</sup> August 2009

**Consultation paper on a central repository for Credit Rating Agencies**

**Date: 9 July 2009 Ref.: CESR/09-579**

Dear Mr. Caspari,

thank you very much for your e-mail dated July 21, 2009 and your invitation to comment on the „Consultation paper on a central repository for Credit Rating Agencies“. We have studied the proposal with great interest.

Instead of answering to individual questions raised in the consultation paper we would like to draw your attention to some general considerations. According to our experience, the rating business is subject to considerable dynamics since markets are changing: Market participants are changing, innovative instruments are introduced, and even new markets are opening up in respects to countries, regions, industries and asset classes.

The content of the CRep according to the proposed Regulation includes: (i) information about credit ratings issued in the past and on their changes, (ii) information on historical performance data including rating transition frequency. Both requirements could be met by a “raw data model”, which would work like follows:

Every rating agency reports any rating in the following format, e.g.:

- Name of issuer concerned
- Specification of the issue resp. financial instrument concerned
- Type of rating
- Rating symbol
- Rating definition
- Date of issuance
- Any modifiers to the rating
- Outlook
- Watchlisting
- Publication status
- Etc.

Identification codes for securities like ISIN or WKN are used in the marketplace anyway; therefore the repository could build on existing data formats to exclude any ambiguity.

When ratings on specific issues or issuers are published and imply that decision making processes of market participants are affected, the fact that such a rating was published by a registered CRA should be entered with all relevant details into the CRep, this way allowing any kind of analysis with respect to the performance of credit ratings.

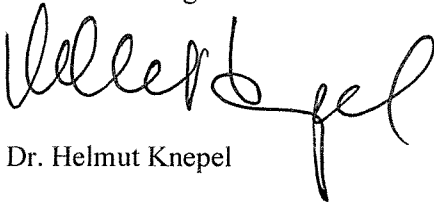
We doubt that the detailed specifications how statistics should look like will be helpful in the long run. New asset classes and issue types, new issuer and structures could soon become major business segments and therefore require correspondingly detailed analysis. Rating agencies with strong profiles in one country would not be identified with their qualifications, if only the USA is looked at separately, but all other countries only on an aggregated level in the geographic breakdown.

Relevant time horizons, rating categories etc. might change, so that the proposed minimum numbers of ratings for presenting data with respect to default rates, both at rating class and a notch level could quickly become obsolete.

Even if anonymously presented, i.e. without specification of the issuer or issue name to the public, a CRep comprising all data on all relevant ratings on which the regulation is imposed would encourage research on any particularity of the behavior of certain ratings, such as event studies on up- or downgrades in selected markets, and therefore allow the public and regulators to gain confidence in the quality, validity and reliability of ratings.

Best regards,

Ferri EuroRating Services AG

A handwritten signature in black ink, appearing to read 'Helmut Knepel'. The signature is written in a cursive style with a long horizontal stroke at the end.

Dr. Helmut Knepel

Cc:

Thomas Schmitz-Lippert, Jörg Schmidt-Ebeling, Dr. Stefan Pankoke  
Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin)