



SOCIETY FOR WORLDWIDE INTERBANK FINANCIAL TELECOMMUNICATION

13th August 2008

Mr Eddy Wymeersch
Chairman
CESR
11-13 avenue de Friedland
75008
Paris

Dear Mr Wymeersch,

Call for Evidence on the UCITS Asset Management Company Passport

Thank you for the opportunity to respond to the call for evidence relating to the request for advice on the UCITS asset management company passport.

Accordingly, please find attached a short summary of the ISO message standards and services which SWIFT supports in respect of operational processes in the funds industry. We believe that these standards can also be relevant, and should be considered, as practical operational tools to support the Management Company Passport.

Yours sincerely

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The role played by SWIFT in the Funds Industry

SWIFT plays an increasing role in the information flow between UCITS Management Companies, UCITS funds, and depositaries. The chart below gives a high level overview of the relationships underpinning the key information flows.

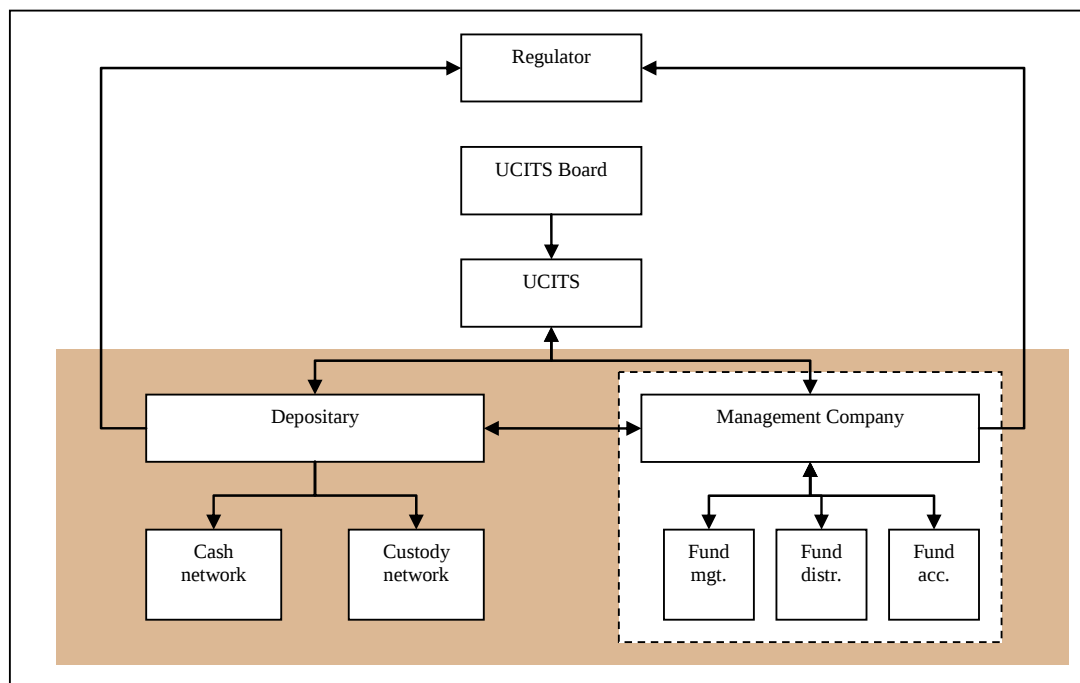


Figure 1 - Relationships between UCITS stakeholders

Today, SWIFT's role mainly focuses on the efficient exchange of information between the Depository and the Management Company on the one hand and between the actors dealing with the responsibilities of the Management Company on the other hand (shaded area on the chart above). SWIFT provides ISO standard messaging formats in these spaces, together with secure network services allowing for automation and processing efficiencies.

The SWIFT network and ISO messages are used for key processes within the fund industry value chain, such as dealing with subscription/redemptions, sending cash flow forecast to the fund manager, settling the transactions done by the fund manager, providing information on transactions done to the fund accountant, sending out the Net Asset Value of the fund to the fund distributors and reconciling positions between depository and accountant (a list of the available ISO 20022 standards is given as appendix 1 below).

The fact that SWIFT offers a global, secured and robust communication network is also of key importance for the underlying risk and compliance management processes, which leverage this efficient exchange of information between the actors involved, resulting ultimately in correct and timely reporting to regulators.

The Management Company Passport

The introduction of a Management Company Passport, whereby the Management Company might no longer be located in the same Member State as the UCITS home Member State, creates an increased need for the exchange of relevant information efficiently ideally in standard formats.

The additional allocation of regulatory responsibilities between the competent authorities responsible for the stakeholders mentioned will result in new information needs at regulator(s) level, requiring these regulators to verify, monitor and enforce the regulatory requirements for which they are responsible. There will also be a need for an exchange of information between regulators of different Member States. We would predict that this will result in requirements for best practices, standardization and automation in order to make the roll out of the Management Company Passport throughout the different Member States and the regulators involved a reality.

As a community owned entity, with a track record in standardisation of information flows in the UCITS business, SWIFT is willing to actively support the definition of the information requirements necessary for the Management Company passport and provide solutions which comply with the needs of the parties involved. The fact that the SWIFT network and SWIFT ISO compliant messages are already used for underlying key processes by the fund industry will be of considerable value in driving this exercise forward, and will potentially allow all stakeholders involved to transfer information flows from one Member State to another Member State efficiently, allowing for full business continuity.

Appendix 1 - List of the current ISO 20022 messages developed by SWIFT to support the Funds community:

1	AccountOpeningInstruction
2	AccountDetailsConfirmation
3	AccountModificationInstruction
4	GetAccountDetails
5	RequestForAccountManagementStatusReport
6	AccountManagementStatusReport
7	FundEstimatedCashForecastReport
8	FundConfirmedCashForecastReport
9	FundDetailedEstimatedCashForecastReport
10	FundDetailedConfirmedCashForecastReport
11	FundConfirmedCashForecastReportCancellation
12	FundDetailedConfirmedCashForecastReportCancellation
13	PriceReport
14	PriceReportCancellation
15	PriceReportCorrection
16	SecuritiesMessageRejection
17	CustodyStatementOfHoldings
18	AccountingStatementOfHoldings
19	CustodyStatementOfHoldingsCancellation
20	AccountingStatementOfHoldingsCancellation
21	StatementOfInvestmentFundTransactions
22	StatementOfInvestmentFundTransactionsCancellation
23	TransferOutInstruction
24	TransferOutCancellationRequest
25	TransferOutConfirmation
26	ReversalOfTransferOutConfirmation
27	TransferInInstruction
28	TransferInCancellationRequest
29	TransferInConfirmation
30	ReversalOfTransferInConfirmation
31	RequestForTransferStatusReport
32	TransferCancellationStatusReport
33	TransferInstructionStatusReport
34	PEPOrISAOrPortfolioTransferInstruction
35	PEPOrISAOrPortfolioTransferConfirmation
36	PEPOrISAOrPortfolioTransferCancellationRequest

37	PEPOrISAOrPortfolioInformation
38	RequestForPEPOrISAOrPortfolioInformation
39	RedemptionBulkOrder
40	RedemptionBulkOrderCancellationRequest
41	RedemptionBulkOrderConfirmation
42	RedemptionOrder
43	RedemptionOrderCancellationRequest
44	RedemptionOrderConfirmation
45	SubscriptionBulkOrder
46	SubscriptionBulkOrderCancellationRequest
47	SubscriptionBulkOrderConfirmation
48	SubscriptionOrder
49	SubscriptionOrderCancellationRequest
50	SubscriptionOrderConfirmation
51	SwitchOrder
52	SwitchOrderCancellationRequest
53	SwitchOrderConfirmation
54	OrderInstructionStatusReport
55	OrderCancellationStatusReport
56	RequestForOrderStatusReport
57	SubscriptionOrderConfirmationCancellationInstruction
58	SubscriptionOrderConfirmationAmendment
59	SubscriptionBulkOrderConfirmationCancellationInstruction
60	SubscriptionBulkOrderConfirmationAmendment
61	RedemptionOrderConfirmationCancellationInstruction
62	RedemptionOrderConfirmationAmendment
63	RedemptionBulkOrderConfirmationCancellationInstruction
64	RedemptionBulkOrderConfirmationAmendment
65	SwitchOrderConfirmationCancellationInstruction
66	SwitchOrderConfirmationAmendment
67	OrderConfirmationStatusReport
68	RequestForOrderConfirmationStatusReport

END