**ESMA Consultation Paper: Draft Technical standards on access to data aggregation and comparison of data across TR under Article 81 of EMIR**

**Q1: Do you foresee any technical issues with the establishment of secure FTP connections between trade repositories and authorities? What are the cost implications of the establishment of secure FTP connections? What other practical difficulties, if any, do you foresee? Please elaborate.**

BTRL supports the establishment of secure FTP connections between trade repositories and authorities and considers any technical and cost issues as integral components of the development of BTRL.

**Q2: Do you foresee any technical issues with the above mentioned data exchange supported by ISO 20022 methodology? Do you foresee any cost implication form the establishment of standardised data exchange?**

BTRL would support operating data exchange supported by ISO 20022 methodology and is currently working to meet this standard.

**Q3: Do you foresee any technical issues with the establishment of recurrent and predefined queries? If so, how would authorities be able to compare and aggregate data across TRs in the absence of standardised queries and how would they be able to make use of TR data for the exercise of their duties if they are not able to properly and immediately access TR data? What are the cost implications stemming from the establishment of the proposed predefined and ad-hoc queries? Do you agree with the minimum set of queries?**

BTRL considers regulatory requests for recurrent and predefined queries as legitimate and integral to the function of supervising trade repositories and will deploy the necessary technical specifications to support this function. BTRL will also support the industry norms for any suggested minimum set of queries.

**Q4: Do you agree with the proposed frequency to provide data to the relevant authorities? Please elaborate.**

BTRL supports and will meet the proposed timelines for the provision of data to the authorities in relation to transaction data regarding:

outstanding derivative contracts which have matured or for which submissions with action types ‘E’, ‘C’, ‘Z’ or ‘P’ were made within the last year is provided by 7am UTC on the day following the one on which the specific request to access is submitted; and

transaction data regarding derivative contracts which have matured or for which submissions with action types ‘E’, ‘C’, ‘Z’ or ‘P’ were made for more than one year before the date on which the request was submitted, to be provided to the authorities no later than three working days after the specific request to access is submitted to the trade repository.

**Q5: Do you agree with this proposal? Please elaborate.**

BTRL supports and will implement the proposed requirements relating to electronic signature and encryption in accordance with Article 80 (1) EMIR.

**Q6: Do you agree with this proposal?**

BTRL supports and will implement the proposed amendments to operating standards on data access and will implement the requirement to send feedback messages to the authority no later than 15 minutes after submission of request in cases where there are invalid data queries.

**Q7: Do you foresee any technical issues with the implementation of xml template in accordance with the ISO 20022 methodology? Do you foresee any technical issues in translating data received in non xml format to an xml template in accordance with ISO 20022 methodology? Do you foresee any benefit from establishing standardised xml in accordance with ISO 20022 methodology for the aggregation and comparison of data? Would any other standard data fulfil to the same extent the requirements set out in paragraph 48 with respect to the aggregation and comparison of data by authorities? Please elaborate.**

BTRL will implement xml templates in accordance with ISO 20022 methodology and is currently working to meet this standard. BTRL considers that establishing this common standard will aid both inter trade repository and supervisory efficiency.

BTRL would also welcome the opportunity for testing these provisions and a test plan which could be implemented at the earliest possible opportunity.