Annex 2

# RESPONSE TO CONSULTATION PAPER

**Please note that all submissions received will be published and attributed to the respective respondents unless they expressly request MAS not to do so.  As such, if respondents would like (i) their whole submission or part of it, or (ii) their identity, or both, to be kept confidential, please expressly state so in the submission to MAS. In addition, MAS reserves the right not to publish any submission received where MAS considers it not in the public interest to do so, such as where the submission appears to be libellous or offensive.**

|  |  |
| --- | --- |
| **Consultation topic:** | Strengthening the Process for Determining SGS & MAS Bills Closing Prices |
| **Name1/Organisation:**  1if responding in a personal capacity |  |
| **Contact number for any clarifications:** |  |
| **Email address for any clarifications:** |  |
| **Confidentiality** | |
| I wish to keep the following confidential: | *(Please indicate any parts of your submission you would like to be kept confidential, or if you would like your identity to be kept confidential. Your contact information will not be published.)* |

**General comments:**

<Please fill in your response to each question in the blank space below the question.>

**Question 1: How do you use the Closing Prices and High/Low prices?**

**Question 2: Although this consultation focuses on the Closing Prices, MAS also seeks feedback on whether and how you use intraday SGS and MAS Bill prices, and how you obtain them.**

**Question 3: MAS seeks comments on the proposed inputs and parameters.**

**Question 4: MAS seeks comments on whether respondents agree with a time window of 4:00pm-4:30pm to gather transacted price inputs. Please provide reasons.**

**Question 5: MAS seeks comments on whether transactions executed through Brokers should be used as transacted price inputs in calculating Closing Prices, in addition to the interdealer transactions on EBND.**

**Question 6: MAS seeks comments on the modes of obtaining inputs.**

**Question 7: MAS seeks comments on the proposal to use the highest and lowest transacted prices on EBND and through Brokers as the published High/Low prices.**

**Question 8: MAS seeks comments on the proposed Closing Prices methodology for SGS bonds.**

**Question 9: Based on the proposed methodology, the computed Closing Prices will be mid prices instead of bid prices currently. MAS seeks comments on this proposed change.**

**Question 10: Under the proposed methodology, transacted prices, Contributions and Submissions will be treated equally when they are “trimmed” (see Exhibit 1 for an example). Under the alternative approach, transacted prices would not be subject to “trimming”. Which approach do you prefer? Please provide reasons.**

**Question 11: MAS seeks comments on the proposed methodology for both benchmark and non-benchmark T-Bills and MAS bills.**

**Question 12: MAS seeks comments on the preferred option (i.e. Option 1A) to determine the yields of Bills maturing before the 4-week benchmark, or suggestions on other possible approaches.**

**Question 13: MAS seeks comments on the proposal for PDs to provide Contributions based on a basket of Bills instead of requiring the yield of a specific benchmark bill.**

**Question 14: MAS seeks comments on the number of days or adjacent bills that would be appropriate for defining the basket of Bills.**

**Question 15: MAS seeks comments on the proposed attestation procedures.**

**Question 16: MAS seeks comments on alternative arrangements to undertake the role of administrator and calculation agent. Interested parties may submit preliminary proposals to undertake the roles of administrator and/or calculation agent.**

**Question 17: Should a third-party administrator/calculation agent be appointed, and free access to Closing Prices is available only after a specified period, what period of delay would be appropriate?**

**Question 18: If free access to Closing Prices is only available after 12pm in the next business day, how much would you be willing to pay for immediate access?**

**Question 19: MAS seeks comments on the proposed transition approach and the duration of the transition.**

**Question 20: MAS seeks comments on the following sections of the Governance Framework document.**

1. Definitions
2. Introduction
3. Administration and Calculation
4. Methodology
5. Submitters’ Code
6. Contingency Procedures
7. Enquiries and Complaints

**Question 21: MAS seeks any other comments on the proposed Closing Prices Framework.**