

- 2.1 The process for identifying non-CMG host jurisdictions where the G-SIFI has a systemic presence should begin as soon as practicable, *not only* after a Crisis Management Group (CMG) has been established. Identifying non-CMG host jurisdictions should be done in conjunction with establishing the CMG.
- 2.2 The criteria for what is considered “material” importance for the G-SIFI should be clear and shared with all jurisdictions where the G-SIFI operates well before any crisis emerges. This will enable host jurisdictions to plan for membership in any future CMG or to prepare an explanation of the G-SIFI’s systemic presence to the host.
- 2.3 This paragraph states that home authorities should be able to obtain from the G-SIFI the relevant information that is necessary to support an analysis of those jurisdictions where a G-SIFI’s operations are deemed locally systemic. Is there a way to ensure that this information will be available to the host jurisdiction? Or will this be contingent upon a bilateral information sharing agreement?
- 2.5 We applaud the principle that “The home authority should generally accept the host authorities’ assessment provided it is supported by the criteria described in Section 3.” We recommend that CMGs work with non-CMGs host authorities –or provide nonpartisan consultants--to provide technical assistance so that the host assessments meet the necessary criteria.

Cooperation and Information Sharing Arrangements

- 4.1 We recommend that the guidance encourage multilateral cooperation and information sharing (between non-CMG members and CMG members in addition to home authorities) without giving preference to bilateral arrangements.

Furthermore, we recommend that non-CMG host countries be formally incorporated into the CMG once it has been determined that the G-SIFI has a systemic presence in their country. This would increase transparency among all stakeholders in the resolution and streamline information sharing, as well as reduce asymmetric information and power relationships between the G-SIFI, home authorities and developing host countries.

Classes of Information to Be Shared

- 5.1 We recommend that this *Guidance* provide a plan for non-CMGs that do not meet the prerequisites for information sharing. Regardless if prerequisites are met, this does not change the potential systemic impact for the host jurisdiction. In an effort to protect its domestic economy, non-CMG host jurisdictions may be forced to act independently which could be counterproductive for the resolution as a whole.

- 5.5 We recommend that the FSB establish a permanent working group or taskforce for cross-border resolution and CMG issues. This working group would be responsible for setting the “minimum standards” for information sharing between CMG members, home and host jurisdictions. FSB members and non-FSB members from the Regional Consultative Groups (RCGs) should have equal representation in such a working group.

Sincerely,

A handwritten signature in black ink, appearing to read "Jo Marie Griesgraber". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Jo Marie Griesgraber
Executive Director,
New Rules for Global Finance

A handwritten signature in black ink, appearing to read "Nathan Coplin". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Nathan Coplin
Deputy Director,
New Rules for Global Finance