

Nomura Holdings, Inc.

2-2-2, Otemachi, Chiyoda-ku,
Tokyo 100-8130 Japan

Telephone+81-3-3274-6653
Facsimile+81-3-3274-4947

Web site: www.nomura.com

Secretariat

The Financial Stability Board
Bank of International Settlements
CH-4002, Basel
Switzerland

Submitted by email: fsb@bis.org

4 April 2014

Dear Secretariat,

Subject: Public Consultation – Assessment Methodologies for Identifying Non-Bank Non-Insurer Global Systemically Important Financial Institutions, Proposed High-Level Framework and Specific Methodologies

Nomura Holdings, Inc. (Nomura) is pleased to have an opportunity to respond to the Financial Stability Board and the International Organization of Securities Commissions consultative document, “*Assessment Methodologies for Identifying Non-Bank Non-Insurer Global Systemically Important Financial Institutions*” published on 8 January 2014. We would like to express our sincere appreciation for all the efforts the Financial Stability Board and the International Organization of Securities Commissions have made to develop the methodologies for identifying NBNI G-SIFIs.

Our response primarily focuses on the scope of assessment and the sector-specific methodologies for market intermediaries (securities broker-dealer).

1. Scope of Assessment

1.1 Financial Holding Companies

We understand that the NBNI financial subsidiaries of financial holding companies will be excluded from the scope of NBNI G-SIFI assessment if the parent financial holding company has been assessed by the BCBS and IAIS on a consolidated basis and the NBNI financial subsidiaries are covered by

consolidated prudential regulation and supervision of the parent financial holding company.

We believe that this is the correct approach and we are fully supportive of this position. The impact and systemic importance of these NBNI entities have been properly assessed in the process of determining G-SIBs and G-SIIs and it would be duplicative and place undue burdens on companies to assess each one individually.

1.2 Basel Compliant Entity

Assessment methodologies should be as consistent as possible among different types of financial entities. With this in mind we would suggest that if any market intermediary (securities broker-dealer) belongs to a financial group subject to consolidated supervision, and that consolidated supervisory framework is internationally recognized as comparable to the Basel's framework, the entity should be assessed by the G-SIB methodology as a group basis rather than the NBNI G-SIFI methodology. We believe that it is appropriate for such market intermediaries to be assessed under the quantitative and straightforward G-SIB methodology.

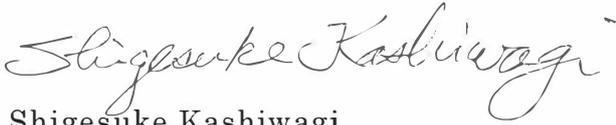
When assessing possible NBNI G-SIFIs it is important to put it in the context of wider principles of regulating shadow banking. We believe that it is important that the regulatory focus should be on activities rather than entities and additional measures should only be applied when an objective assessment can be made that that activity poses a systemic risk to the financial system. A regulatory focus on entities is likely to shift activities from a regulated and approved entity to non-designated entities, resulting in the potential for additional risk and market distortions.

2. Sector-specific Methodologies: Market intermediaries (Securities broker-dealers)

We share the assessment of the consultative document notes about the difficulty in obtaining data, in particular, quantitative data on a globally consolidated basis. This difficulty would be particularly acute for types of data such as BIS statistics for market intermediaries as they are principally not subject to BIS rule. In identifying data gathering requirements for these market intermediaries, it is crucial that FSB and IOSCO takes into account that the characteristics of their business models is different from banks.

We hope our response is sufficient clear and concise and, of course, would be delighted to discuss our views in more detail should you find useful.

Yours sincerely,



Shigesuke Kashiwagi
Executive Managing Director
Chief Financial Officer
Nomura Holdings, Inc.