

Question

Please note that ISDA has provided specific criteria below so that respondents understand how ISDA will use consultation responses to determine how to implement fallbacks for the ISRs.

Respondents should review all of the information above and the linked documents, including in particular the NLTf Paper and the ARRC Paper, in addition to whatever other information they deem relevant, in formulating their answer to the question below.

By participating in this consultation, you agree not to use this process for any anticompetitive purpose, and further agree and warrant that you will not engage in any conduct that would cause any other party participating in this consultation to be in violation of any competition or antitrust law or regulation. ISDA has taken and will continue to take safeguards and protections to ensure that the use of the results of this consultation comply with applicable laws and regulations.

Do you agree with the ISR fallbacks provisions set out in the draft amendments?

Yes

No

If you selected “No”, please indicate whether you would be unavoidably harmed by, and/or unable to use, the fallback provisions.

We welcome additional explanation for your response but you are not required to provide any.

Please feel free to submit technical feedback to the draft fallback provisions directly to BenchmarkReform@isda.org.

Respondent Name (will not be disclosed): _____

Respondent Country: _____

Respondent Type (please select one):

- Bank/broker-dealer ○
- Market infrastructure (e.g., central counterparty) ○
- Asset manager ○
- Energy/commodity firm ○
- Hedge fund ○
- Insurance company ○
- Local or regional government entity, supranational or government sponsored entity ○
- Pension fund ○
- Other end user (e.g., corporate) ○
- Professional services firm or trade association ○

Respondent jurisdictions and types will be used for determining whether the consultation is successful, as explained below, and will be published on an anonymized and aggregated basis.

Responses are due Friday, July 2, 2021. This deadline will not be extended. Please email your response to FallbackConsult@isda.org and clearly indicate that you are submitting a response in the subject line of your email.