



31 March 2017

Ms Heidi Richards  
General Manager, Policy Development  
Australian Prudential Regulation Authority

By email: [ADIpolicy@apra.gov.au](mailto:ADIpolicy@apra.gov.au)

Dear Ms Richards

**Consultation on Proposed Reporting Requirements for the Countercyclical  
Capital Buffer:  
Reporting Standard ARS 110 – Capital Adequacy**

The Australian Financial Markets Association (AFMA) welcomes the opportunity to comment on the proposed amendment to Reporting Standard ARS 110.0 Capital Adequacy.

AFMA has consulted with its authorised deposit-taking institution (ADI) members on the proposed amendments, and no substantive issues have been raised. As a matter of record AFMA notes that there are no apparent reasons which would be a barrier to APRA proceeding with its proposal.

Please contact me at [mregan@afma.com.au](mailto:mregan@afma.com.au) or on (02) 9776 7992 if further clarification or elaboration is desired.

Yours sincerely

**Murray Regan**  
**Director – Markets and Rates**