

Hi David,

Thank you for the opportunity to comment on APRA's proposal to determine international exposures data as non-confidential.

In summary, we support the proposal. In general we support the publishing and disclosure of aggregate industry data as this will provide transparency and better inform third parties and market participants, and also help to drive the process of making data collections more relevant and useful.

Whilst there may be potential issues created by the ability of readers to pinpoint exposures to one ADI, it is considered that the risks created by this are low and that the potential benefits outweigh this risk.

The paper states that APRA has no plans to publish individual entity data. We would appreciate being consulted if at some stage in the future this is planned to occur.

We also assume that there will be no changes to reporting requirements or reporting dates as a result of the change.

One minor point - on page 3 of the paper it refers to the first determinations applying at '31 March 2003', which should be '2013'.

If you would like to discuss the above, please feel free to contact me.

Regards

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