

Template for comments

Public consultation on the ECB guide to internal models - General topics chapter

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Please tick here if you do not wish your personal data to be published.						
General comments						

 Deadline:
 28 May 2018

ID	Section	Paragraph	Page	Type of comment	Detailed comment	Concise statement as to why your comment shincorporated
1	Management of changes to the IRB approach	Classification	44	Charification	Pagagraph 109 requests that the assessment and classification of a model change or extension is confirmed by a unit independent of the one responsible for the assessment and classification of the change or extension. As a bosnote, it is further advised that institutions may also consider the elements of Article 11(2)I of the Final Draft on assessment methodology for IRB with regard to the classification process. To classify model changes, Delegated Regulation (EU) No 5292014 provides a large number of detailed qualitative provisions and specific guidance to perform a quantitative impact analysis to be used as an additional classification measure and backstop inthis. Furthermore, changes must not be sight to reach a lower classification category. As a result, these niles provide a tight classification frame and do not leave room for varying interpretations according to our view. Therefore, and unite the separation read of criminal reparation (EU) to 2020/2014 contains a similar reparation requirement regarding the classification of IRB models cannot great the CRF of the contains a similar reparation requirement regarding the classification of IRB models cannot great the CRF of the	Ensuring proper category assignment