



**EUROPEAN CENTRAL BANK**  
BANKING SUPERVISION

## Template for comments

Public consultation on the draft ECB Regulation on the definition of the materiality threshold for credit obligations past due pursuant to Commission Delegated Regulation (EU) 2018/171

**Institution/Company**

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

**General comments**

We need to know for "non Euro" countries, what is the exchange rate to use in order to compare the total amount past due with the absolute threshold

For the quantitative impact analysis1- for,

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Please enter all your feedback in this list.

When entering feedback, please make sure that:

- each comment deals with a single issue only;
- you indicate whether your comment is a proposed amendment, clarification or deletion.

**Deadline:** 17 August 2018

ID	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
1	Clarification	We need to know for " non Euro" countries, what is the exchange rate to use in order to compare the total amount past due with the absolute threshold: 1- For the simulation of the impact of the new definition of default (on historical data) 2- After the go live, when we will monthly calculate the default status of the obligor.	Explanations required to make the quantitative impact analysis.	Elisa, RAVELOSON	Publish