Template for comments

Public consultation on the Review of the ECB Regulation on supervisory fees

Institution/Company
Intesa Sanpaolo SpA

Contact person

Mr/Ms
▮

First name
▮

Surname
▮

Email address
▮

Telephone number
▮

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

General comments

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Public consultation on the Review of the ECB Regulation on supervisory fees

Please enter all your feedback in this list.
When entering your feedback, please make sure:
    - that each comment only deals with a single issue;
    - to indicate the relevant article/chapter/paragraph, where appropriate;
    - to indicate whether your comment is a proposed amendment, clarification or deletion.

Deadline:

ID	Article of the regulation	Page	Type of comment	Detailed comment	Concise statement why your comment should be taken on board
1	art. 6	L 311/27	Amendment	ECB should propose each year by September an estimate of the supervisory costs for the following year and possibly a three-year forecast of expenditures, with obviously non-binding assumptions of fee for each institution.	The aim is to facilitate the budget process of the supervised entities
2	art. 12 par. 3	L 311/29	Amendment	The amount due under the fee notice should be paid by the fee debtor within 45 days of the date of issuance of the fee notice.	Increasing the time for the payment from 35 to 45 days would further ease the management of the internal payment process.
3	art. 10 par. 3	L 311/28	Amendment	The fee factor "Total Risk Exposure" should be adjusted through a coefficient given by the ratio between the Institution P2R+P2G percentage and the average P2R+P2G percentage of the relevant group (significant and non significant entities). The total risk exposure consequently amended shoud replace the simple "Totale Risk Exposure" to reallocate the variable component among entities, according to their modified risk exposure.	The coefficient would allow a more precise allocation of costs according to the overall risk of each entity.
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