

# CONSULTATION FORM

The EBA invites comments on all proposals put forward in this paper and in particular on the specific questions detailed below. Comments are most helpful if they:

- respond to the question stated;
- indicate the specific point to which a comment relates;
- are supported by a clear rationale;
- provide evidence to support the view s expressed/rationale proposed; and provide alternative regulatory options f or consideration by the EBA.

All the fields marked (\*) are mandatory. In case a question is not relevant for you, please answer with "Non-Applicable" or "NA".

All contributions received will be published following the close of the consultation, unless you request otherwise by ticking the relevant box in the form below. Please note that a request to access a confidential response may be submitted in accordance with the EBA's rules on public access to documents. We may consult you if we receive such a request. Any decision we make not to disclose the response is review able by the EBA's Board of Appeal and the European Ombudsman.

#### New response

Details

Do you agree with the definition of sole or mechanistic reliance on ratings provided in this document?

Yes, we agree.

# Do you agree with the proposed action as regard EBA and ESMA Guidelines and Recommendations?

Yes, we agree.

In particular, do you agree with the proposed revisions of the ESMA Money Market Funds Guidelines? If not, please suggest an alternative.

We completely agree with the proposed revisions of the ESMA Money Market Funds Guidelines. Infact they contribute to reducing the excessive and often mechanistic reliance to credit rating provided by CRAs in the context of money market fund management and ensure that requirements in Art. 5b(1) of the CRA Regulation are fulfilled.



# **Disclose comments**

Yes

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Milan, 4 December 2013