General Information (Origin of Request)		
☐ User Requirements (URD)		
☒ Other User Functional or Technical Documentation (SYS)		
Request raised by: Migration Sub-group	**Institute:** ECB	**Date raised:** 23 November 2012
Request title: Support the migration of reserved, blocked and earmarked positions on securities accounts using the Data Migration Tool		**Request ref. no:** T2S 0385 SYS
Request type: Common		**Urgency:** Normal
1. Legal/business importance parameter: High		**2. Market implementation efforts parameter:** Low
3. Operational/Technical risk parameter: High (if not implemented)		**4. Financial impact parameter:** Low
Requestor Category: T2S Sub-group		**Status:** Authorised at Steering Level

Reason for change and expected benefits/business motivation:

Currently the DMT baseline specification does not cover the option to upload intra-position movements. This would require that such instructions have to be sent using A2A messages or files. However, intra-position movements are necessary to create the initial positions of type blocked or reserved. The upload of such instructions would only be possible during the related phase of the migration weekend, as otherwise validations might fail due to incomplete static data. In addition, relying on an upload of intra-position movements via A2A or entering them via U2A would increase the dependencies and necessary coordination effort between actions performed by the migrating CSDs and the T2S Operator during the migration weekend. This current limitation increases the risks of delays or problems during the migration weekend, as any problem with the connectivity or the upload of those messages/files would result in such a delay.

By allowing the upload of intra-position movements via the DMT those files can be uploaded at an earlier point in the migration process, thus reducing the time dependencies on this activity, as the T2S Operator would trigger the processing of those files only during the relevant phase of the migration weekend. Moreover, the DMT would be a good contingency mean in case problems are encountered with the connectivity or the upload of messages/files via A2A during the migration weekend.

In addition, the implementation of this CR would harmonise the process for setting up existing securities positions, increase the control on the migration process and mitigate the risks of delays caused by these activities.
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Description of requested change:

The purpose of the change is to include the support for setting up blocked, reserved and earmarked positions on securities accounts in the Data Migration Tool (DMT) to allow CSDs to migrate such positions not only via A2A /U2A, but using the DMT.

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Submitted annexes / related documents:

DMT requirements and related procedures v0.6
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Proposed wording for the Change request:

The last paragraph of chapter 3.2 (Data coverage of the DMT) should be modified as follows:

As regards the dynamic data the DMT covers the migration of the initial positions on the securities accounts via FOP instructions and intra-position movements (for blocked, reserved and earmarked positions) via the securities restrictions during the migration weekends. The migration of pending settlement instructions, settlement restrictions and maintenance instructions is essentially the same as the submission of these instructions as part of the normal T2S operations of CSDs. These instructions will therefore not be covered by the DMT.

CR 0386 is proposing a change to the same paragraph. If both CRs are approved, the paragraph should be modified as follows:

As regards the dynamic data the DMT covers:
- the migration of pending settlement instructions, and
- the migration of the initial positions on the securities accounts via FOP instructions and intra-position movements (for blocked, reserved and earmarked positions) via the securities restrictions

during the migration weekends.

The migration of pending ~~settlement instructions, settlement restrictions and~~ maintenance instructions is essentially the same as the submission of these instructions as part of the normal T2S operations of CSDs. These instructions will therefore not be covered by the DMT.

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High level description of Impact:

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Outcome/Decisions:

- CRG Telco on 10 December 2012: The CRG recommended a detailed assessment by 4CB.

- CSG meeting of 13 December 2012: The CSG decided to request the detailed assessment by the 4CB.

- CRG meeting on 25 March 2013: Based on the detailed assessments of CR 385 and taking into account that it could be implemented before the start of the User Testing phase; the CRG proposed that the CR 385 should be submitted to the Steering level for approval.

- CSG resolution on 5 April 2013: Following a written procedure, the CSG adopted the resolution to approve the Change Request.

- Advisory Group's advice on 5 April 2013: Following a written procedure, the AG was in favour of the Change Request.