



31 March 2017

Ms Heidi Richards
General Manager, Policy Development
Australian Prudential Regulation Authority

By email: ADIpolicy@apra.gov.au

Dear Ms Richards

**Consultation on Proposed Reporting Requirements for the Countercyclical
Capital Buffer:
Reporting Standard ARS 110 – Capital Adequacy**

The Australian Financial Markets Association (AFMA) welcomes the opportunity to comment on the proposed amendment to Reporting Standard ARS 110.0 Capital Adequacy.

AFMA has consulted with its authorised deposit-taking institution (ADI) members on the proposed amendments, and no substantive issues have been raised. As a matter of record AFMA notes that there are no apparent reasons which would be a barrier to APRA proceeding with its proposal.

Please contact me at mregan@afma.com.au or on (02) 9776 7992 if further clarification or elaboration is desired.

Yours sincerely

Murray Regan
Director – Markets and Rates