Global Technical Committee

CFTC PositionReport Enhancements

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Revision 0.2

Proposal Status: Approved~~Public Comment~~

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Primary Contact Person	Robert Stowsky, CFTC	Release Identifier	5.0 SP3

r3.2

DISCLAIMER

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Document History

Revision	Date	Author	Revision Comments
r0.1	9/2/2015	Dean Kauffman for CME	Initial draft based on internal gap analysis.
r0.2	9/4/2015	Robert Stowsky for CFTC	Resolved XID versus Desc issue
	Oct. 9, 2015	GTC PMO	ASBUILT created

1 Introduction

In reviewing its position reporting guidelines based on FIX, CFTC has determined that there is no clear indication in the position maintenance messages as to which streams the client is paying or receiving in swap contracts or whether the client is paying or receiving a bullet payment.

2 Business Requirements

2.1 Position Maintenance

The FIX fields that identify the payer and receiver of swap payment streams and bullet payments use the value of Side(54) associated with the party as reference. That serves well for trade reporting but the Side(54) field does not appear in the position maintenance messages. CFTC first proposed using the industry standard terminology for buy and sell of an IRS – the buyer pays the fixed rate stream, the seller pays the floating rate stream. However this breaks down for float/float and more complex contracts as well as for commodity and equity swaps.

Figure 1. Payer and Receiver in Trades versus Positions

2.1.1 Swap Stream Payer and Receiver

The solution proposed for swap stream payer and receiver is to introduce new enumerations for PartySubIDType(803) of “Payer” and “Receiver”. Then the paired PartySubID(523) quotes the StreamDesc(40051) of the stream the party is paying or receiving. See the rightmost message table in Figure 1 above. Full examples of PositionReport messages with the proposed enhancements are given in Appendix D - Usage Examples.

2.1.2 Bullet Payment Payer and Receiver

For bullet payments the swap stream solution works equally well simply by adding a PaymentDesc(~~tbd~~43087) field to the <PaymentGrp> component and quoting its value in thePartySubID(523) paired with the new PartySubIDType(803) enumerations. See the rightmost message table in Figure 1 above.

3 Issues and Discussion Points

	Issue	Date	Status	Discussion
1	XID versus Desc	9/1/2015	Closed	When the StreamGrp component was first designed it was **StreamXID(41303)** that was meant to be the cross-reference element. XML schema validation ensures that all XIDs are unique and that all XIDRef fields have a corresponding XID in the document. XIDRefs need not be unique. (The id= and href= attributes in FpML have the same XML datatypes and work the same way.) The XIDRef feature does not help us out in our solution because the datatype of **PartySubID(523)** is String not XIDRef. But in other respects the XID/XIDRef approach is preferable to descriptions which were never intended to be references. The concept was first broken when **PosAmtStreamDesc(2096)** was added to PositionAmountData in EP162 – this field should have been **PosAmtStreamXIDRef** with datatype XIDRef. Keeping with that design would require adding **PaymentXID** instead of **PaymentDesc(~~tbd~~43087)** and have **PartySubID(523)** point there and to **StreamXID(41303)**. In line with that would also require adding **PosAmtStreamXID** to the PositionAmountData component and discontinue use of

	Issue	Date	Status	Discussion
				PosAmtStreamDesc(2096). Resolution: CFTC prefers not to use the XID and XIDRef approach at this time.

4 Proposed Message Flow

There are no changes to existing message flows.

5 FIX Message Tables

There are no changes to FIX messages.

6 FIX Component Blocks

6.1 Component PaymentGrp

To be completed at the time of the proposal – all information provided will be included in the repository	
Component Name	PaymentGrp
Component Abbreviated Name (for FIXML)	Pmt
Component Type	_X__ Block Repeating ___ Block
Category	(no change)
Action	__New _X_Change
Component Synopsis Required, short, one or two paragraph description of the component..	(no change)
Component Elaboration Optional longer description of the component usage	(no change)
To be finalized by FPL Technical Office	
Repository Component ID	4027

Component FIXML Abbreviation: <*Pmt*>

Tag	*Field Name*		*Req'd*	*ICR*	*Action*	*Mappings and Usage Comments*	*Comments*
40212	NoPayments		N				
→	***40213***	***PaymentType***	N				
→	***40993***	***PaymentSubType***	N				
→	***40214***	***PaymentPay~~Receive~~Side***	N				
→	***~~tbd~~43087***	***PaymentDesc***	N		NEW		
→	***40215***	***PaymentReceive~~Pay~~Side***	N				
→	***40216***	***PaymentCurrency***	N				
→	***40217***	***PaymentAmount***	N				
(…truncated…)							
</Alloc>							

7 Category Changes

None.

Appendix A - Data Dictionary

Tag	FieldName	Action	Datatype	Description	FIXML Abbreviation	Add to / Deprecate from Message type or Component block
~~tbd~~43087	PaymentDesc	NEW	String	A short descriptive name given to the payment,~~-~~ e.~~E~~g. Premium, Upfront, etc. The description has no intrinsic meaning but should be arbitrarily chosen by the remitter as reference.	Desc	Add to component PaymentGrp
40213	PaymentType	CHANGE	int	*Correct spellingof enum text and symbol:* 6 = Caencelable provision [CaencelableProvision]		
803	PartySubIDType	CHANGE	int	*Add enumerations:* 74~~<tbd>~~ = Payer [Elaboration: Identifies the party as the payer of a particular payment stream or bullet payment by quoting the stream's StreamDesc(40051) (or LegStreamDesc(40243) or UnderlyingStreamDesc(40542)) or payment's PaymentDesc(43087~~tbd~~) in the associated ~~PartySubID(523)~~ party sub-identifier field.] 75~~<tbd>~~ = Receiver [Elaboration: Identifies the party as the receiver of a particular payment stream or bullet payment by quoting the stream's StreamDesc(40051) (or LegStreamDesc(40243) or UnderlyingStreamDesc(40542)) or payment's PaymentDesc(~~tbd~~43087) in the associated ~~PartySubID(523)~~ party sub-		

				identifier field.]		

Appendix B - Glossary Entries

None.

Appendix C - Abbreviations

None.

Appendix D - Usage Examples

Figure 2. ABC enters into a swap with XYZ which was cleared through CME – ABC's Position


```xml
<?xml version="1.0" encoding="UTF-8"?>
<PosRpt AcctTyp="1" BizDt="2015-02-13" Clrd="1" DiscFctr="0.966447003281979" MsgEvtSrc="EODP"
  PrevBizDt="2015-08-10" RptID="CCCIRS2074518_17416909097" SettlDt="2023-02-17" TrmtdInd="N"
  TxnTm="2015-08-11T18:00:00-05:00" Txt="IRS">
  <Pty ID="350" R="4" Src="D">
    <Sub ID="ABC" Typ="5"/>
    <Sub ID="COTC" Typ="43"/>
    <Sub ID="FIXED" Typ="tbd1"/> <!-- ABC pays fixed rate -->
    <Sub ID="FLOAT" Typ="tbd2"/> <!-- ABC receives floating rate -->
  </Pty>
  <Pty ID="CME" R="21" Src="M">
    <Sub ID="FIXED" Typ="tbd2"/> <!-- CME receives fixed rate -->
    <Sub ID="FLOAT" Typ="tbd1"/> <!-- CME pays floating rate -->
  </Pty>
  <Pty ID="12345678" R="38" Src="D"/>
  <Instrmt AssetClss="1" AssetSubClss="1" SecTyp="IRS" SwapClss="IX">
    <Strm Ccy="EUR" Desc="FLOAT" Notl="5150000" Typ="0">
      <EfctvDt BizDayCnvtn="4" Dt="2016-02-17"/>
      <TrmtnDt BizDayCnvtn="4" Dt="2023-02-17">
        <BizCtr Ctr="EUTA"/>
      </TrmtnDt>
      <CalcDts BizDayCnvtn="4" FreqPeriod="6" FreqUnit="Mo" Roll="17">
        <BizCtr Ctr="EUTA"/>
      </CalcDts>
      <PmtStrm CmpndgMeth="0" DayCnt="6">
        <PmtDts BizDayCnvtn="4" FirstDtUnadj="2015-08-12" FreqPeriod="6" FreqUnit="Mo"
          OfstDayTyp="0" OfstPeriod="1" OfstUnit="D" Reltv="4">
          <BizCtr Ctr="EUTA"/>
        </PmtDts>
        <ResetDts BizDayCnvtn="4" FixngBizDayCnvtn="1" FixngDayTyp="0" FixngPeriod="-2"
          FixngReltv="5" FixngUnit="D" FreqPeriod="6" FreqUnit="Mo" Reltv="3">
          <BizCtr Ctr="EUTA"/>
          <FixngBizCtr Ctr="EUTA"/>
        </ResetDts>
        <Float FnlRt="0" Ndx="EUR-EURIBOR-Reuters" Ndx2Period="0" Ndx2Unit="D" NdxPeriod="6"
          NdxSrc="99" NdxUnit="Mo" Spread="0"/>
      </PmtStrm>
    </Strm>
    <Strm Ccy="EUR" Desc="FIXED" Notl="5150000" Typ="0">
      <EfctvDt BizDayCnvtn="4" Dt="2016-02-17"/>
      <TrmtnDt BizDayCnvtn="4" Dt="2023-02-17">
```

```
          <BizCtr Ctr="EUTA"/>
        </TrmtnDt>
        <CalcDts BizDayCnvtn="4" FreqPeriod="1" FreqUnit="Yr" Roll="17">
          <BizCtr Ctr="EUTA"/>
        </CalcDts>
        <PmtStrm CmpndgMeth="0" DayCnt="1">
          <PmtDts BizDayCnvtn="4" FirstDtUnadj="2015-08-12" FreqPeriod="1" FreqUnit="Yr"
            OfstPeriod="1" OfstUnit="D" Reltv="4">
            <BizCtr Ctr="EUTA"/>
          </PmtDts>
          <ResetDts FixngReltv="5"/>
          <Fixed Rt="0.006"/>
        </PmtStrm>
      </Strm>
    </Instrmt>
    <Amt Amt="0" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" StrmDesc="FLOAT" Typ="ACPN"/>
    <Amt Amt="0" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Rt="0" StrmDesc="FLOAT"
      Typ="CPN"/>
    <Amt Amt="0" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" StrmDesc="FIXED" Typ="ACPN"/>
    <Amt Amt="0" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" StrmDesc="FIXED" Typ="CPN"/>
    <Amt Amt="0.24" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Rsn="4"/>
    <Amt Amt="-19874" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Typ="CMTM"/>
    <Amt Amt="-19874" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Typ="FMTM"/>
    <Amt Amt="52662.84" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Typ="NPV"/>
    <Amt Amt="0" Ccy="EUR" FxRt="0.9078" FxRtCalc="D" MktSegID="IRS" Typ="SNPV"/>
    <Amt Amt="3574.2" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Typ="PV01"/>
    <Pmt Amt="23000" Ccy="EUR"  Dt="2015-08-12" Desc="FIXED" Typ="99"/> <!-- ABC makes additional payment -->
</PosRpt>
```


Figure 3. ABC versus XYZ – XYZ's Position


```
<?xml version="1.0" encoding="UTF-8"?>
<PosRpt AcctTyp="2" BizDt="2015-02-13" Clrd="1" DiscFctr="0.966447003281979" MsgEvtSrc="EODP"
  PrevBizDt="2015-08-10" RptID="CCCIRS2074519_17417169069" SettlDt="2023-02-17" TrmtdInd="N"
  TxnTm="2015-08-11T18:00:00-05:00" Txt="IRS">
  <Pty ID="401" R="4" Src="D">
    <Sub ID="XYZ" Typ="5"/>
    <Sub ID="FIXED" Typ="tbd2"/> <!-- XYZ receives fixed rate -->
    <Sub ID="FLOAT" Typ="tbd1"/> <!-- XYZ pays floating rate -->
  </Pty>
  <Pty ID="CME" R="21" Src="M">
    <Sub ID="FIXED" Typ="tbd1"/> <!-- CME pays fixed rate -->
    <Sub ID="FLOAT" Typ="tbd2"/> <!-- CME receives floating rate -->
  </Pty>
  <Pty ID="87654321" R="38" Src="D"/>
   <Instrmt AssetClss="1" AssetSubClss="1" SecTyp="IRS" SwapClss="IX">
    <Strm Ccy="EUR" Desc="FLOAT" Notl="5150000" Typ="0">
      <EfctvDt BizDayCnvtn="4" Dt="2016-02-17"/>
      <TrmtnDt BizDayCnvtn="4" Dt="2023-02-17">
        <BizCtr Ctr="EUTA"/>
      </TrmtnDt>
      <CalcDts BizDayCnvtn="4" FreqPeriod="6" FreqUnit="Mo" Roll="17">
        <BizCtr Ctr="EUTA"/>
      </CalcDts>
      <PmtStrm CmpndgMeth="0" DayCnt="6">
```

```
          <PmtDts BizDayCnvtn="4" FirstDtUnadj="2015-08-12" FreqPeriod="6" FreqUnit="Mo"
            OfstDayTyp="0" OfstPeriod="1" OfstUnit="D" Reltv="4">
            <BizCtr Ctr="EUTA"/>
          </PmtDts>
          <ResetDts BizDayCnvtn="4" FixngBizDayCnvtn="1" FixngDayTyp="0" FixngPeriod="-2"
            FixngReltv="5" FixngUnit="D" FreqPeriod="6" FreqUnit="Mo" Reltv="3">
            <BizCtr Ctr="EUTA"/>
            <FixngBizCtr Ctr="EUTA"/>
          </ResetDts>
          <Float FnlRt="0" Ndx="EUR-EURIBOR-Reuters" Ndx2Period="0" Ndx2Unit="D" NdxPeriod="6"
            NdxSrc="99" NdxUnit="Mo" Spread="0"/>
        </PmtStrm>
      </Strm>
      <Strm Ccy="EUR" Desc="FIXED" Notl="5150000" Typ="0">
        <EfctvDt BizDayCnvtn="4" Dt="2016-02-17"/>
        <TrmtnDt BizDayCnvtn="4" Dt="2023-02-17">
          <BizCtr Ctr="EUTA"/>
        </TrmtnDt>
        <CalcDts BizDayCnvtn="4" FreqPeriod="1" FreqUnit="Yr" Roll="17">
          <BizCtr Ctr="EUTA"/>
        </CalcDts>
        <PmtStrm CmpndgMeth="0" DayCnt="1">
          <PmtDts BizDayCnvtn="4" FirstDtUnadj="2015-08-12" FreqPeriod="1" FreqUnit="Yr"
            OfstPeriod="1" OfstUnit="D" Reltv="4">
            <BizCtr Ctr="EUTA"/>
          </PmtDts>
          <ResetDts FixngReltv="5"/>
          <Fixed Rt="0.006"/>
        </PmtStrm>
      </Strm>
    </Instrmt>
    <Amt Amt="0" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" StrmDesc="FLOAT" Typ="ACPN"/>
    <Amt Amt="0" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Rt="0" StrmDesc="FLOAT"
      Typ="CPN"/>
    <Amt Amt="0" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" StrmDesc="FIXED" Typ="ACPN"/>
    <Amt Amt="0" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" StrmDesc="FIXED" Typ="CPN"/>
    <Amt Amt="-0.24" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Rsn="4"/>
    <Amt Amt="19874" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Typ="CMTM"/>
    <Amt Amt="19874" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Typ="FMTM"/>
    <Amt Amt="-52662.84" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Typ="NPV"/>
    <Amt Amt="0" Ccy="EUR" FxRt="0.9078" FxRtCalc="D" MktSegID="IRS" Typ="SNPV"/>
    <Amt Amt="-3574.2" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Typ="PV01"/>
    <Pmt Amt="23000" Ccy="EUR"  Dt="2015-08-12" Desc="FIXED" Typ="99"/> <!-- XYZ receives additional payment -->
</PosRpt>
```


Figure 4. ABC enters into the opposite swap with TUV which was cleared through CME – ABC's Position


```
<?xml version="1.0" encoding="UTF-8"?>
<PosRpt AcctTyp="1" BizDt="2015-05-08" Clrd="1" DiscFctr="0.966447003281979" MsgEvtSrc="EODP"
  PrevBizDt="2015-08-10" RptID="CCCIRS2412709_17416909821" SettlDt="2023-02-17" TrmtdInd="N"
  TxnTm="2015-08-11T18:00:00-05:00" Txt="IRS">
  <Pty ID="ABC" R="4" Src="D">
     <Sub ID="FLOAT" Typ="tbd1"/> <!-- ABC pays floating rate -->
    <Sub ID="FIXED" Typ="tbd2"/> <!-- ABC receives fixed rate -->
  </Pty>
```

```
<Pty ID="CME" R="21" Src="M">
  <Sub ID="FLOAT" Typ="tbd2"/> <!-- CME receives floating rate -->
  <Sub ID="FIXED" Typ="tbd1"/> <!-- CME pays fixed rate -->
</Pty>
<Pty ID="12345678" R="38" Src="D"/>
<Instrmt AssetClss="1" AssetSubClss="1" SecTyp="IRS" SwapClss="IX">
  <Strm Ccy="EUR" Desc="FLOAT" Notl="5150000" Typ="0">
    <EfctvDt BizDayCnvtn="4" Dt="2016-02-17"/>
    <TrmtnDt BizDayCnvtn="4" Dt="2023-02-17">
      <BizCtr Ctr="EUTA"/>
    </TrmtnDt>
    <CalcDts BizDayCnvtn="4" FreqPeriod="6" FreqUnit="Mo" Roll="17">
      <BizCtr Ctr="EUTA"/>
    </CalcDts>
    <PmtStrm CmpndgMeth="0" DayCnt="6">
      <PmtDts BizDayCnvtn="4" FirstDtUnadj="2015-08-12" FreqPeriod="6" FreqUnit="Mo"
        OfstDayTyp="0" OfstPeriod="1" OfstUnit="D" Reltv="4">
        <BizCtr Ctr="EUTA"/>
      </PmtDts>
      <ResetDts BizDayCnvtn="4" FixngBizDayCnvtn="1" FixngDayTyp="0" FixngPeriod="-2"
        FixngReltv="5" FixngUnit="D" FreqPeriod="6" FreqUnit="Mo" Reltv="3">
        <BizCtr Ctr="EUTA"/>
        <FixngBizCtr Ctr="EUTA"/>
      </ResetDts>
      <Float FnlRt="0" Ndx="EUR-EURIBOR-Reuters" Ndx2Period="0" Ndx2Unit="D" NdxPeriod="6"
        NdxSrc="99" NdxUnit="Mo" Spread="0"/>
    </PmtStrm>
  </Strm>
  <Strm Ccy="EUR" Desc="FIXED" Notl="5150000" Typ="0">
    <EfctvDt BizDayCnvtn="4" Dt="2016-02-17"/>
    <TrmtnDt BizDayCnvtn="4" Dt="2023-02-17">
      <BizCtr Ctr="EUTA"/>
    </TrmtnDt>
    <CalcDts BizDayCnvtn="4" FreqPeriod="1" FreqUnit="Yr" Roll="17">
      <BizCtr Ctr="EUTA"/>
    </CalcDts>
    <PmtStrm CmpndgMeth="0" DayCnt="1">
      <PmtDts BizDayCnvtn="4" FirstDtUnadj="2015-08-12" FreqPeriod="1" FreqUnit="Yr"
        OfstPeriod="1" OfstUnit="D" Reltv="4">
        <BizCtr Ctr="EUTA"/>
      </PmtDts>
      <ResetDts FixngReltv="5"/>
      <Fixed Rt="0.006"/>
    </PmtStrm>
  </Strm>
</Instrmt>
<Amt Amt="0" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" StrmDesc="FLOAT" Typ="ACPN"/>
<Amt Amt="0" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Rt="0" StrmDesc="FLOAT"
  Typ="CPN"/>
<Amt Amt="0" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" StrmDesc="FIXED" Typ="ACPN"/>
<Amt Amt="0" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" StrmDesc="FIXED" Typ="CPN"/>
<Amt Amt="-0.24" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Rsn="4"/>
<Amt Amt="19874" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Typ="CMTM"/>
<Amt Amt="19874" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Typ="FMTM"/>
<Amt Amt="-52662.84" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Typ="NPV"/>
<Amt Amt="0" Ccy="EUR" FxRt="0.9078" FxRtCalc="D" MktSegID="IRS" Typ="SNPV"/>
<Amt Amt="-3574.2" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Typ="PV01"/>
```

```
  <Pmt Amt="23000" Ccy="EUR"  Dt="2015-08-12" Desc="FIXED" Typ="99"/> <!-- ABC receives additional payment -->
</PosRpt>
```

Figure 5. ABC versus TUV – TUV's Position

```
<?xml version="1.0" encoding="UTF-8"?>
<PosRpt AcctTyp="2" BizDt="2015-05-08" Clrd="1" DiscFctr="0.966447003281979" MsgEvtSrc="EODP"
  PrevBizDt="2015-08-10" RptID="CCCIRS2412708_17417372325" SettlDt="2023-02-17" TrmtdInd="N"
  TxnTm="2015-08-11T18:00:00-05:00" Txt="IRS">
  <Pty ID="560" R="4" Src="D">
    <Sub ID="TUV" Typ="5"/>
    <Sub ID="FLOAT" Typ="tbd2"/> <!-- TUV receives floating rate -->
    <Sub ID="FIXED" Typ="tbd1"/> <!—TUV pays fixed rate -->
  </Pty>
  <Pty ID="CME" R="21" Src="M">
    <Sub ID="FLOAT" Typ="tbd1"/> <!-- CME pays floating rate -->
    <Sub ID="FIXED" Typ="tbd2"/> <!-- CME receives fixed rate -->
  </Pty>
  <Pty ID="4567890" R="38" Src="D"/>
   <Instrmt AssetClss="1" AssetSubClss="1" SecTyp="IRS" SwapClss="IX">
    <Strm Ccy="EUR" Desc="FLOAT" Notl="5150000" Typ="0">
      <EfctvDt BizDayCnvtn="4" Dt="2016-02-17"/>
      <TrmtnDt BizDayCnvtn="4" Dt="2023-02-17">
        <BizCtr Ctr="EUTA"/>
      </TrmtnDt>
      <CalcDts BizDayCnvtn="4" FreqPeriod="6" FreqUnit="Mo" Roll="17">
        <BizCtr Ctr="EUTA"/>
      </CalcDts>
      <PmtStrm CmpndgMeth="0" DayCnt="6">
        <PmtDts BizDayCnvtn="4" FirstDtUnadj="2015-08-12" FreqPeriod="6" FreqUnit="Mo"
          OfstDayTyp="0" OfstPeriod="1" OfstUnit="D" Reltv="4">
          <BizCtr Ctr="EUTA"/>
        </PmtDts>
        <ResetDts BizDayCnvtn="4" FixngBizDayCnvtn="1" FixngDayTyp="0" FixngPeriod="-2"
          FixngReltv="5" FixngUnit="D" FreqPeriod="6" FreqUnit="Mo" Reltv="3">
          <BizCtr Ctr="EUTA"/>
          <FixngBizCtr Ctr="EUTA"/>
        </ResetDts>
        <Float FnlRt="0" Ndx="EUR-EURIBOR-Reuters" Ndx2Period="0" Ndx2Unit="D" NdxPeriod="6"
          NdxSrc="99" NdxUnit="Mo" Spread="0"/>
      </PmtStrm>
    </Strm>
    <Strm Ccy="EUR" Desc="FIXED" Notl="5150000" Typ="0">
      <EfctvDt BizDayCnvtn="4" Dt="2016-02-17"/>
      <TrmtnDt BizDayCnvtn="4" Dt="2023-02-17">
        <BizCtr Ctr="EUTA"/>
      </TrmtnDt>
      <CalcDts BizDayCnvtn="4" FreqPeriod="1" FreqUnit="Yr" Roll="17">
        <BizCtr Ctr="EUTA"/>
      </CalcDts>
      <PmtStrm CmpndgMeth="0" DayCnt="1">
        <PmtDts BizDayCnvtn="4" FirstDtUnadj="2015-08-12" FreqPeriod="1" FreqUnit="Yr"
          OfstPeriod="1" OfstUnit="D" Reltv="4">
          <BizCtr Ctr="EUTA"/>
        </PmtDts>
```

```
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            <Fixed Rt="0.006"/>
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    </Strm>
  </Instrmt>
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    Typ="CPN"/>
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  <Amt Amt="52662.84" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Typ="NPV"/>
  <Amt Amt="0" Ccy="EUR" FxRt="0.9078" FxRtCalc="D" MktSegID="IRS" Typ="SNPV"/>
  <Amt Amt="3574.2" Ccy="EUR" FxRt="0.9056" FxRtCalc="D" MktSegID="IRS" Typ="PV01"/>
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</PosRpt>
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