

Q#	Question for Consultation	Participant's Response
1	<p><b>Summary:</b> The DSB has been investigating vendors for the Security Operations Centre (SOC) following the 2022 industry consultation exercise. Due to lack of responses, the DSB has investigated an alternative option to introduce Security Incident Event Management (SIEM) Tooling under the umbrella of the existing MSP support function.</p> <p>The two options proposed are:</p> <ul style="list-style-type: none"> <li>• Third-Party SOC - Outsourced 24x7 SOC, SIEM and security triage</li> <li>• DSB SOC - Enhance existing 24 x 7 DSB support team with additional SIEM tooling and security resource</li> </ul> <p>Both options will require an increase in resource as the SOC vendor will not provide root cause analysis or remediation on a security incident.</p> <p><b>Question 1: Should the DSB progress with the deployment of a Security Operations Centre with the preferred delivery option being recommended by the TAC?</b></p>	<p>We do not support the progression towards a Security Operations Centre via either option proposed.</p> <p>Both options essentially add over Eur 1mm per year to the total costs, or approximately 10% to the overall operating expenditure. However, the consultation notes that, "feedback has been that the DSB has been operating an appropriate level of security".</p> <p>In our view the risks, principally cyber threats, could be better mitigated at much lower costs in other ways, whilst the likely availability of countervailing technology over the forecast period will likely become both more effective and more economical.</p>
2	<p><b>Summary:</b> As a result of the DSB's 2019 Industry Consultation process, the DSB undertook further analysis to determine the effort required to automate the Proprietary Index process. In 2020, the DSB concluded that the size of the investment could not be justified given the infrequent nature of the Proprietary Index submissions to the DSB.</p> <p>More recently, there has been an increase in the number of Proprietary Index submissions. As the process remains based around email requests, which are processed manually, there are occasions when the requests have been impacted by delayed processing. The revisiting of this topic seeks to obtain feedback on the importance of this process to the users of the service, and to understand if there are ways the service can be improved.</p>	<p>We are not aware of any usage or benefits of ISIN creation from Proprietary Index submissions, and therefore would not in principle support the funding of this segment.</p> <p>We therefore have no comments as to whether the process is fit for purpose.</p>

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	<p>Question 2: Is the current Proprietary Index process fit for purpose? If no, then please answer questions 2.2 and 2.3 below.</p> <ul style="list-style-type: none"> <li>Question 2.2: If the Proprietary Index process is not fit for purpose, what issues have you encountered with the process and what impact have these caused to your organisation?</li> <li>Question 2.3: Do you have any suggestions as to how the Proprietary Index process could be improved?</li> </ul>	
3	<p><b>Summary:</b> In advance of each of the last three releases to the Production Environment, the DSB has received a postponement request, each from an individual user. All three requests were received very close to the production implementation date requiring escalation to the DSB Management Team and the TAC. The DSB has been unable to support the release postponement requests as the postponement would impact other users who have undergone preparations to implement the release as scheduled, as well as the need to keep the DSB's release schedule on track.</p> <p>The TAC was also asked to review the DSB's notice period for change and were happy for the DSB to remain with the current notice periods.</p> <p>Industry is asked if they support the proposed improvements to the technical release process to mitigate the recent issues experienced by users.</p> <p><b>Question 3: Do you agree with the proposed improvements to the DSB release process as defined in the supporting information?</b></p> <p><b>Question 3.2: Do you have any other suggestions as to how the DSB can improve its release process to avoid the need for last minute deferral requests?</b></p>	<p>Yes, we fully support the proposed improvements to the DSB release process as set out.</p> <p>In light of these changes we would simply support a moratorium on any last-minute deferral requests after a defined cut off point to be stated in the user terms.</p>

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4	<p><b>Summary:</b> The Search Only API User Type was introduced as a new user type in 2022 after industry support in responses to the 2020 Industry Consultation paper.</p> <p>The Search Only API User Fees were set at 50% of the standard feeds yet API functionality requires more infrastructure and support costs than the GUI user types.</p> <p>Industry is asked if they continue to support the original fee positioning for Search Only API User Type of 50% of the Standard User Fee or if this should be revisited to align with similar programmatic functionality.</p> <p><b>Question 4: Should the Search Only API User Fee be represented as 1/3 of the Power User fee, reflecting the infrastructure and support costs for programmatic connectivity?</b></p>	<p>Yes, in principle we would support "Search Only" API User Fee to be reset to 1/3 of the Power User fee, subject to an annual reaffirmation. Before any commensurate reduction in the power user segment, a-priori this would be a change from c. Eur 25k to c. Eur 45k.</p> <p>The AnnaDSB should detail what that overall increased revenue segment would be and how that would be applied to the reduce the other user segments.</p> <p>This appears to better reflect the underlying costs, although we note that the number of "Search Only" API Users only appears to be two [2], which therefore makes any commensurate reductions elsewhere rather minimal at this point..</p>
5	<p>Please use this space for any other comments you wish to provide</p>	<p>We note that the costs and services going forward will be greatly impacted by the parallel operation of the UPI service. Information around synergies and efficiencies related to this would be welcome.</p>