

SWEDISH SECURITIES DEALERS ASSOCIATION

SVENSKA FONDHANDLAREFÖRENINGEN

2014-01-27

European Securities and Markets Authority

Response to the Discussion Paper on possible implementing measures under the Market Abuse Regulation (ESMA 2013/1649)

Dear Sirs,

The Swedish Securities Dealers Association (SSDA)¹ appreciates the opportunity to respond to ESMA's ***Discussion Paper regarding ESMA's policy orientations on possible implementing measures under the Market Abuse Regulation(MAR)***.

The SSDA has the following comments.

We have had a chance to review the response by EBF, and wish to express our support for the general and detailed comments provided by EBF, and wish to submit them on our behalf as well. Furthermore, we want to express our support to the comments from Telefonaktiebolaget Ericsson regarding Section VII the Insider list.

In addition thereto, we have the following remarks

In general the proposed procedures for market sounding appears relatively burdensome to the market participants. The information requirements for the Insider List will only create unnecessary, costly administrative burdens for the companies. It should only be mandatory with first name, surname and identification number (national or the companies).

Lars Afrell

¹ SSDA represents the common interest of banks and investment-services-firms active on the securities market. The mission of SSDA is a sound, strong and efficient securities market in Sweden. SSDA promotes member's view in regards to regulatory, market and infrastructure-related issues. It also provides a neutral forum for discussing and exchanging views on matters which are of common interest to its members.

SSDA have a close cooperation with other trade associations in Sweden, in the Nordic area and in the UK. SSDA is also active on European arena via EBF (European Banking Federation) and EFSA (European Forum of Securities Associations) and globally through ICSA (International Committee of Securities Associations).

Director