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Global Foreign Exchange Division  
39<sup>th</sup> Floor  
25 Canada Square  
Canary Wharf  
London  
E14 5LQ

TO:

Ann E. Misback, Secretary,  
Board of Governors of the Federal  
Reserve System, 20th Street and  
Constitution Avenue NW, Washington,  
DC 20551

Via email: [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov)

July 12, 2021

**Federal Register Docket No. OP-1747  
Proposed Guidelines for Evaluating Account and Services Requests**

Dear Ms. Misback,

The Global Foreign Exchange Division (GFXD) of the Global Financial Markets Association (GFMA) welcomes the opportunity to comment on behalf of its members on the ‘Proposed Guidelines for Evaluating Account and Services Requests’ issued jointly by the Board of Governors of the Federal Reserve System in May 2021.

The GFXD was formed in co-operation with the Association for Financial Markets in Europe (AFME), the Securities Industry and Financial Markets Association (SIFMA) and the Asia Securities Industry and Financial Markets Association (ASIFMA). Its members comprise 23 global foreign exchange (FX) market participants,<sup>1</sup> collectively representing a significant portion of the foreign exchange inter-dealer market. Both the GFXD and its members are committed to ensuring a robust, open, and fair FX marketplace and welcome the opportunity for continued dialogue with global regulators.

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<sup>1</sup> Bank of America, Bank of New York Mellon, Barclays, BNP Paribas, Citi, Credit Agricole, Credit Suisse, Deutsche Bank, Goldman Sachs, HSBC, JP Morgan, Lloyds, Mizuho, Morgan Stanley, MUFG, NatWest, Nomura, Northern Trust, RBC, Standard Chartered, State Street, UBS, and Wells Fargo.

The FX market is the world's largest financial market. Effective and efficient exchange of currencies underpins the world's entire financial system.

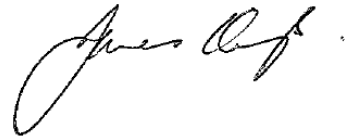
Whilst we do not have specific comments on the Proposed Guidelines themselves, we do support the establishment of factors for reviewing Federal Reserve Bank access requests that are centered around risk identification, management, and mitigation.

Given the importance of safe, reliable, resilient, and efficient payment systems for the settlement of wholesale FX transactions, we believe that stringent regulatory standards and robust oversight of access to Federal Reserve Bank accounts, financial services and payment systems are vital.

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We appreciate the opportunity to comment on the Proposed Guidelines. Please do not hesitate to contact Victoria Cumings on +1 212 313 1141, email [vcumings@us.gfma.org](mailto:vcumings@us.gfma.org) should you have questions.

Yours sincerely,

A handwritten signature in black ink, appearing to read "James Kemp". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

James Kemp  
Managing Director  
Global Foreign Exchange Division, GFMA