

# Billing Processes Adaptation Plan

## BNY Mellon

Activity	Billing Processes
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## Background

The Adaptation Plan provides information on the changes which will be implemented to meet the AMI-SeCo Standards for Billing Processes which form part of the Single Collateral Management Rulebook for Europe (SCoRE). Full details of the Billing Processes Standards can be found on the [ECB website](#).

The document is structured as follows: Section 1 (Cover Letter) provides a high-level summary of the changes in order to implement the AMI-SeCo Standards. Section 2 (Adaptation Plan Table) then provides a more detailed overview per Standard covering a feasibility assessment and the implementation milestones.

## 1 Cover Letter

As previously communicated, BNY Mellon is a strong supporter of the harmonisation work carried out under the aegis of the Advisory Group on Market Infrastructures for Securities and Collateral (AMI-SeCo), and in particular of the work of the Task Force on Collateral Management Harmonisation.

Attached to this response are detailed comments on BNY Mellon's alignment status to Billing standards.

To complement these detailed comments, this letter sets out some high-level comments that are relevant for the compliance with the CMH-TF standards.

Where we are in scope for business process harmonization and not yet aligned with the standard, we have included our high level gap assessment to our current offering and plan to align with the standard. Please note that the detailed impact assessment and requirements documentation is in progress and the timelines are subject to change if additional scope/impact is uncovered as a part of that process.

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For specific terminology please refer to the [ECB glossary](#) (available in English only).

## 2 Adaptation Plan Table

AMI-SeCo Standard			Feasibility Assessment			Implementation Milestones			
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	User Communication	Internal Adaptation	Start of User Testing	Implemented by Nov. 2022?
1	<b>Implementation of ISO 20022 messages for billing processes</b>	<i>Dissemination of billing information shall be offered using an ISO 20022 message.</i>	Adaptation Required	Develop the ability to generate ISO 20022 billing information messages	N/A	Initial communication to our clients will be in June 2020. Subsequent communications are planned as we move through the design and development process.	Impact analysis/Requirements - Current through Q2 2020 Development – Q3 2020 - Q1 2021 Internal Testing and Resolution of Issues - Q1 2021 onward	We will monitor potential user testing demand/user delays and report as part of our updates. We will support user testing beginning in November 2021 if our user base is ready.	Implementation complete in November 2022
2	<b>Harmonised billing cycles</b>	<i>Billing information shall be provided on a monthly basis. The billing period shall be from the first day of the month to the last day of the month inclusive.</i>	Adaptation Required	Support the ability to generate billing invoices in line with the standard timeline.	No	Initial communication to our clients will be in June 2020. Subsequent communications are planned as we move through the design and development process.	Impact analysis/Requirements - Current through Q3 2020 Development - Q4 2020 - Q1 2021 Internal Testing and Resolution of Issues - Q1 2021 onward	We will monitor potential user testing demand/user delays and report as part of our updates. We will support user testing beginning in November 2021 if our user base is ready.	Implementation complete in November 2022
3	<b>Cut-off date for provision of billing information by (I)CSDs</b>	<i>(I)CSDs shall provide billing information to their clients no later than the 8th (or next business day) of the month for fees related to depository services and/or triparty collateral management services.</i>	Not Applicable	N/A	N/A	N/A	N/A	N/A	N/A
4	<b>Harmonised dates for payment of fees to (I)CSDs</b>	<i>Cash payments to the (I)CSDs shall be processed on the 15th (or next business day) of each month for fees related to depository services and/or triparty collateral management services.</i>	Implemented	N/A	N/A	N/A	N/A	N/A	N/A