

Head of Card, Loans and Payments Retail Banking & Wealth Management HSBC UK Level 6 1 Centenary Square Birmingham B1 1HQ

15 October 2019

Retail Banking Remedy Review Team (RBFA) Competition and Markets Authority The Cabot 25 Cabot Square London E14 4QA

Via email remedies.reviews@cma.gov.uk

Dear Sir

Review of Part 6 of the Retail Banking Market Investigation Order 2017 (the Order).

Thank you for the opportunity to respond to your provisional decision document dated 12 September 2019. We are broadly supportive and have just one comment.

The proposal requires Banks to submit a final compliance statement on 31 January 2020. We note that the Draft Revocation Order requires us to submit all of the information that was included in our first compliance statement.

This seems to contradict with the original Order (Article 50.1.4), which envisages that in subsequent compliance statements, Banks are to submit information only to the extent it has changed since the previous statement. It seems unnecessary to provide duplicate information from previous compliance statements and we would therefore ask the CMA to reconsider this particular procedural point.

Please get in touch with my colleague Richard Brown who will be happy to discuss this further with you.



Yours sincerely

Madhu Kejriwal Head of Cards, Loans and Payments