

<b>Comments Template on EIOPA-CP-14-047</b> <b>Draft proposal for Level 3 Guidelines on reporting and public disclosure</b>		<b>Deadline</b> <b>02.Mar.2015</b> <b>23:59 CET</b>
Company name:	MetLife	
Disclosure of comments:	EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential.  Please indicate if your comments on this CP should be treated as confidential, by deleting the word Public in the column to the right and by inserting the word Confidential.	Public
<p>Please follow the instructions for filling in the template:</p> <ul style="list-style-type: none"> <li>⇒ <b>Do not</b> change the numbering in column "Reference".</li> <li>⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph, keep the row <u>empty</u>.</li> <li>⇒ Our IT tool does not allow processing of comments which do not refer to the specific paragraph numbers below. <ul style="list-style-type: none"> <li>○ If your comment refers to multiple paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other paragraphs this also applies.</li> <li>○ If your comment refers to sub-bullets/sub-paragraphs, please indicate this in the comment itself.</li> </ul> </li> </ul> <p><b>Please send the completed template to <a href="mailto:Consultation_Set2@eiopa.europa.eu">Consultation_Set2@eiopa.europa.eu</a>, in MSWord Format, (our IT tool does not allow processing of any other formats).</b></p> <p>The paragraph numbers below correspond to Consultation Paper No. EIOPA-CP-14-047.</p>		
Reference	Comment	
General Comment	<p>In so far as possible every effort should be made to minimise the number of updates to the reporting requirements in order to prevent additional costs arising from changes to reporting systems and processes on the part of the preparer. In addition to the cost implications this takes focus away which could hamper readiness.</p> <p>We believe that it should be more explicitly laid out that all disclosures apply only to proportionate and material items.</p>	
1.1.		

<b>Comments Template on EIOPA-CP-14-047</b>		<b>Deadline</b>
<b>Draft proposal for Level 3 Guidelines on reporting and public disclosure</b>		<b>02.Mar.2015</b>
		<b>23:59 CET</b>
1.2.		
1.3.		
1.4.		
1.5.		
1.6.		
1.7.		
1.8.		
1.9.		
1.10.		
1.11.		
1.12.		
1.13.		
1.14.		
1.15.		
1.16.		
1.17.		
1.18.		
1.19.		
1.20.		
1.21.		
1.22.		
1.23.		
1.24.		
1.25.		
1.26.		
1.27.		

<b>Comments Template on EIOPA-CP-14-047 Draft proposal for Level 3 Guidelines on reporting and public disclosure</b>		<b>Deadline 02.Mar.2015 23:59 CET</b>
1.28.		
1.29.		
1.30.		
1.31.		
1.32.		
1.33.		
1.34.		
1.35.		
1.36.		
1.37.		
1.38.	<b>Guideline 22</b> – Since branch figures will be part of the RSR, it is unclear why a listing of branches is needed.	
1.39.		
1.40.		
1.41.		
1.42.		
1.43.		
1.44.		
1.45.		
1.46.		
1.47.		
1.48.		
1.49.		
1.50.		
1.51.		
1.52.		

<b>Comments Template on EIOPA-CP-14-047 Draft proposal for Level 3 Guidelines on reporting and public disclosure</b>		<b>Deadline 02.Mar.2015 23:59 CET</b>
1.53.		
1.54.		
1.55.		
1.56.		
1.57.		
1.58.	<b>Guideline 41</b> - 1.58(b) goes beyond Article 55 (1) of the Directive. There is no requirement for review and approval by the Board of all reports.	
1.59.		
1.60.	<b>Guideline 43</b> – It is unclear what is the linkage between data model point in QRTs and the RSR disclosure.	
1.61.	<b>Guideline 44</b> – The scope of data submitted to the supervisory authorities should be clarified.	
1.62.		
1.63.		
1.64.	<b>Guideline 46</b> – We question whether this should be business function, as opposed to business unit.  We recommend detailed reporting timelines and processes in order to ensure accuracy and completeness be maintained separately to avoid the policy having to undergo frequent updates, particularly as the policy should be approved by the Board. The detailed requirements should be left at the discretion of management.	
1.65.	<b>Guideline 47</b> – It should be more explicit that there is no requirement for the Board to review the quarterly quantitative reports produced under the preparatory phase.	
1.66.		
Annex I <sup>1</sup>		

<sup>1</sup> If you have specific comments on Technical Annex 1 – Validations, please provide them line by line.