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<tr><td>ECO-SLV-12-098<br><br>20 February 2012</td><td colspan="2">Comments Template on Proposal for<br>Quantitative Reporting Templates for Financial Stability Purposes</td><td>Deadline<br>20 February 2012</td></tr>
<tr><td>Name of Company:</td><td colspan="3">CEA</td></tr>
<tr><td>Disclosure of comments:</td><td colspan="2">Please indicate if your comments should be treated as confidential:</td><td>Public</td></tr>
<tr><td></td><td colspan="2">Please follow the following instructions for filling in the template:<br><br>⇨ <u>Do not change the numbering</u> in the column “reference”; if you change numbering, your comment cannot be processed by our IT tool<br><br>⇨ Leave the last column <u>empty</u>.<br><br>⇨ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph or a cell, keep the row <u>empty</u>.<br><br>⇨ Our IT tool does not allow processing of comments which do not refer to the specific numbers below.<br><br>o In spreadsheets & LOGs, certain cell number may seem like they are missing (ex : going directly from cell B1 to cell B3); this is normal, as they may refer to a previously existing cell that has been deleted during informal consultations, and cell numberings have not been changed for internal consistency purposes<br><br>o If your comment refers to multiple cells or paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other cells or paragraphs this also applies.<br><br>o If your comment refers to subparagraphs or specific cells within a group, please indicate this in the comment itself.<br><br>Please send the completed template, <u>in Word Format</u>, to<br><br><u>cp-011@EIOPA.europa.eu</u>. Our IT tool does not allow processing of any other formats.<br><br>The numbering of the paragraphs refers to this Consultation Paper; the numbering of cells refers to the <u>accompanying spreadsheets and LOGs.</u></td><td></td></tr>
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| Reference | Comment | |
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| General Comment | The CEA would like to thank EIOPA for engaging in discussions with the industry to ensure the contents of the quantitative reporting templates (QRTs) package will be considered well in advance of entry into force of Solvency II. The industry expects that 18 months is required to implement the necessary systems and procedures to support systematic reporting of Solvency II information.<br><br>There are many other ongoing initiatives to change the current requirements for supervisory reporting. Clarity is needed as soon as possible on how these initiatives fit together and on who will be the end user of this information.<br><br>It is crucial that these requirements do not result in a multiplication of the burden put on undertakings. It is very important to ensure that a single date for reporting is achieved, this should be the timeline currently set for Solvency II supervisory reporting.<br><br>This is the first time EIOPA has consulted on information to be reported for financial stability purposes and we look forward to engaging in further discussions with EIOPA in refining these proposals and overall incorporation into the QRTs package. This in particular applies to the new financial stability indicators.<br><br>**The industry does however have some outstanding concerns which we would ask EIOPA to consider.**<br><br>**We believe that the proposed threshold is too low and will capture many undertakings, as opposed to only the largest, as is the stated intention of EIOPA:** we believe that this threshold adopts a top down approach and we would recommend that supervisors consider a more bottom up approach by examining percentage per market share and qualitative assessments, for example.<br><br>**Solo deadlines should not be imposed on groups, in the case that data is available on time, it will be in a raw form and not suitable for prudential** | |

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| | **supervisory purposes:** We recommend to align deadlines with the overall deadlines set for the regular QRTs, for groups, this would mean extending the deadline by 6 weeks compared to solo-undertakings. Requiring a subset does not imply fewer burdens for the industry. We have concerns over using raw data which has not been sufficiently validated for the purpose of Solvency II supervision.<br><br>**Financial stability information should be targeted and fit for purpose:** we do not believe the proposed financial stability indicators reflect the nature of the (re)insurance business. We would welcome the opportunity to discuss these matters further with EIOPA, once the industry has had time to further investigate the proposals.<br><br>**We would like to point out the significant additional burden to include non-EEA entities for some of the templates**: financial Stability reporting does not exempt non-EEA-entities within EEA Groups. The benefit to the ESRB's monitoring of macro systematic risk across Europe by including non-EEA entities is unclear. In addition, we envisage practical difficulties and significant costs in incorporating them into the current QRTs where there are equivalent regimes.<br><br>**Fourth quarter reporting should not be required**: annual reporting contains sufficient information and we do not believe that the fourth quarter adds additional insights. We would ask that EIOPA delete the requirement of preparing fourth quarter information.<br><br>With regards to proposals to report specific information from the QRTs at an accelerated timeframe, our main concerns at the moment lie with overall deadlines. For comments on the QRTs cell-by-cell, please refer to our detailed comments on the QRTs (ECO-SLV-12-045).<br><br>The industry has had to consider EIOPA's proposals on the entire reporting package in a very short period of time, in particular the new financial stability proposals. The CEA would very much welcome the opportunity to come back to EIOPA on the policy options and financial stability indicators, once the industry has had some time to | |

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| | assess these proposals. | |
| 3.1 | **We have concerns with regards to the proposed threshold as we believe an unintended number of undertakings would be captured under the scope of supervision for financial stability purposes.**<br><br>We note that EIOPA has used the threshold established in the Financial Conglomerates Directive (2002/87/EC) when identifying a group as a conglomerate. Article 3(3) refers to cross-sectoral activities, in terms of triggering identification of a group as a financial conglomerate. Under Article 3(3), cross sectoral activities shall be deemed significant if the balance sheet of the smallest financial sector exceeds 6bn Euro. This sector would then be added to the largest financial sector, thus making a conglomerate. We question whether the threshold for the smallest sector of a conglomerate is therefore a suitable proxy for identifying large groups/undertakings for the overall (re)insurance industry.<br><br>At international level, the IAIS has considered using different thresholds for Life and Non-Life groups when considering market structure and size, we query why EIOPA has not considered a similar approach here.<br><br>Overall, we believe that this threshold adopts a top down approach and we would recommend that supervisors consider a more bottom up approach by examining percentage per market share and qualitative assessments, for example. We would appreciate further guidance or information from EIOPA on the impact of their proposed threshold and rationale for proposing this exact one. Feedback on the perceived number of undertakings that would be captured would be particularly welcome. | |
| 3.2 | We appreciate EIOPA's move towards removing solo requirements so that financial stability reporting could be performed at group level only, however please refer to paragraph 3.1 for comments on the threshold. | |
| 3.3 | **We support EIOPA's proposals to introduce a level of advance warning in terms of falling under scope**. However please refer to paragraph 3.1 for general | |

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| | comments on the proposed threshold. | |
| 3.4 | Please refer to paragraph 3.3. | |
| 3.5 | Please refer to paragraph 3.3. | |
| 3.6 | | |
| 3.7 | **We do not believe that the proposed deadlines for reporting financial stability templates are feasible. We urge EIOPA to seriously re-consider these deadlines and the meaningfulness of these data requirements for financial stability monitoring purposes.**<br><br>EIOPA should not require groups to report financial stability information to the same deadlines as applied by solo undertakings. To consolidate this information at a group level, before it is compiled at solo level, would be a huge challenge. The raw data simply will not be available at group level within the same deadlines.<br><br>**It should be absolutely clear that extra time is allowed for groups to perform their consolidation process. Otherwise, we would ask that EIOPA facilitate the aggregation/consolidation exercise based on solo data available to them within the proposed timelines.**<br><br>EIOPA requires a subset of data from the QRTs for financial stability monitoring however it should be noted that underlying calculations and assumptions will still be required in order to present this subset and it is unlikely this would delivered via an automated process. **Requiring a subset does not imply fewer burdens for the industry unless the result is data of a lesser quality. We have concerns over using raw data which has not been sufficiently validated for supervisory purposes.**<br><br>The template containing financial stability indicators may interfere with other reporting requirements based on accounting and stock market regulation. These indicators will set deadlines particularly for publicly listed (re)insurance groups which are ahead of | |

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| | disclosing its financial results. Releasing such price sensitive information (e.g. profit and loss numbers) before any form of public disclosure to the stock market (even privately to the local regulator/ EIOPA) could be a high risk for those undertakings.<br><br>**We recommend to align deadlines with the overall deadlines set for the regular QRTs, for groups, this would mean extending the deadline by 6 weeks compared to solo-undertakings.** | |
| 3.8 | | |
| 4.1 | Please refer to paragraph 3.7 for comments on the availability of underlying data required for consolidated reporting. | |
| 4.2 | It may be possible to alter reporting systems to include requests for targeted information however it would be a huge challenge to reorganise Solvency II reporting to meet different deadlines to those set out in the Framework Directive and draft Level 2 text. | |
| 4.3 | | |
| 4.4 | **It should be absolutely clear that extra time is allowed for groups to perform their consolidation process. Otherwise, we propose that EIOPA facilitate the aggregation/consolidation based on solo data available to them within the proposed timelines.** | |
| 4.5 | **We agree with the approach that national supervisors are responsible for collecting financial stability information from the undertakings which they have granted authorisation. However additional users in the data chain should not cut short the time required for undertakings to compile, validate and present their reports.**<br><br>Again, we would like to express concern with the proposed deadlines. It is our understanding that the European Systemic Risk Board (ESRB) is the end user of such | |

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| | financial stability information. This means that at every level, the user will require time to process, validate and present the information. | |
| 6.1 | Delays in the drafting of the Level 2 text are causing great uncertainty for the industry. While we support EIOPA's commitment to work in advance of these negotiations, it will be difficult for the industry to provide feedback sufficient for a full cost/impact assessment before the final requirements are known. | |
| 6.2 | Please refer to paragraph 6.1 with regards to uncertainty in the final proposals. | |
| 6.3 | | |
| 6.4 | | |
| 6.5 | We support the initiative of EIOPA to work in advance of these deadlines so as that industry and other stakeholders have sufficient time to consider the proposals. | |
| 6.6 | We understand the need for national supervisors to collect information specific to their market however, to ensure a maximum harmonisation approach, national specific templates should be kept to a minimum. | |
| 6.7 | Please refer to paragraph 4.5 regarding the challenges for industry in meeting different user requirements within conflicting timeframes. | |
| 6.8 | | |
| 6.9 | | |
| 6.10 | It should be noted that this impact assessment was carried out in 2007. | |
| 6.11 | We do not find that policy options for reporting were dealt with in the Deloitte assessment therefore we query EIOPA's motivation to refer to its results here. | |
| 6.12 | The industry were given 2 months to respond to this consultation and as CEA commented at the time, it was not possible to complete a full impact assessment | |

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| | within this time period.<br><br>**In general, we question how useful the Impact Assessments on Levels 1 and 2 were for reporting as most of the reporting requirements were left to be specified under Level 3.** | |
| 6.13 | | |
| 6.14 | | |
| 6.15 | Please refer to paragraph 3.1. We question whether this proposal does actually exclude small and medium sized undertakings. | |
| 6.16 | | |
| 6.17 | | |
| 6.18 | Please refer to paragraph 3.1. We question whether this proposal does actually exclude small and medium sized undertakings. | |
| 6.19 | | |
| 6.20 | In the majority of cases, volatility will impact on own funds to a much greater extent than the SCR market risk module. In the case that volatility does occur in own funds, and hence the SCR coverage ratio, quarterly information will already be reported in OF-B1A/Q. | |
| 6.21 | **The framework directive of Solvency II does not foresee quarterly calculation of the SCR therefore we see this proposal as being hugely excessive.** | |
| 6.22 | We support EIOPA’s proposal to consider simplified solutions. However it is already foreseen by the Framework Directive to only recalculate the SCR if the risk profile of an (re)insurance or re(re)insurance undertaking deviates significantly from the assumptions underlying the last reported SCR. Based on the Framework Directive, it should therefore be possible to report the last available SCR for anything more than | |

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| | annual reporting. | |
| 6.23 | | |
| 6.24 | Please refer to paragraph 6.20 for comments on volatility and the impact on own funds.<br><br>In any case, as per the Framework directive, we would expect to have to re-calculate the market risk module SCR only if the risk profile of a (re)insurance undertaking deviates significantly from the assumptions underlying the last reported SCR for market risk.<br><br>The SCR calculations require a lot of time and would be incredibly burdensome for all undertakings, regardless of size. Furthermore, the Solvency II Framework already include means of continuous monitoring (namely the ORSA) and circumstances where the last SCR would be obsolete and should be recalculated are already in the Framework. Thus, the SCR should be submitting on an infra-annual basis only in those exceptional circumstances or predefined events. | |
| 6.25 | Please refer to paragraphs 6.20 to 6.24. | |
| 6.26 | | |
| 6.27 | Please refer to paragraphs 6.20 to 6.24. | |
| 6.28 | Please refer to paragraphs 6.20 to 6.24. | |
| 6.29 | **There should be transparency in terms of identifying all users of these data requirements and their purpose.** It is crucial to ensure that the same information is not reported, multiple times, at different reporting dates and deadlines, via different channels, for the purposes of the same user e.g. ESRB. | |
| 6.30 | | |

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| 7.1 | **The industry has been given less than 2 months to consider these proposals therefore a cost/impact assessment detailing impacts on pricing, design, product availability and more importantly, consumer and wider social economic impacts, was not possible to complete.** | |
| 7.1 Q1 | **A full systematic calculation of the SCR on a quarterly basis is unjustifiably burdensome given the nature of the (re)insurance business.**<br><br>We do not expect that some of the risks' SCRs will change substantially over the period of one year, for example underwriting risks, operational risk.<br><br>For the risks where the SCR is more likely to change over the year, their SCR should only be recalculated if the risk profile of the undertaking deviates significantly from the assumptions underlying the last reported SCR.<br><br>Article 102 of Level 1 foresees annual calculation of the SCR. | |
| 7.1 Q2 | **We query what value P&L information would add to financial stability monitoring given that it is based on the previous reporting period.**<br><br>For undertakings already obliged to report/disclose this information on a quarterly basis (listed companies under the Transparency Obligations Directive 2004/109/EC), this requirement would pose no additional burden.<br><br>**However not all (re)insurance groups will be listed and in addition, certain local GAAP rules do not require quarterly reporting/disclosure of the P&L statement. For those undertakings, these proposals would have a significant impact.**<br><br>It needs to be clarified, that EIOPA refer to P&L figures taken from financial reporting statements and that no reconciliation would be required with the Solvency II Balance Sheet. | |

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| 7.1 Q3 | **We support a phasing in/phasing out approach to ensure undertakings are not caught unexpectedly with new requirements.** We do however have concerns with regards to the threshold proposed, please refer to paragraph 3.1.<br><br>**We are however concerned that the threshold will not only capture "large (re)insurance groups" and "large solo undertakings" but will inadvertently include a number of smaller undertakings.**<br><br>We would appreciate the opportunity to discuss this matter further with EIOPA once the industry has had more time to assess these proposals. | |
| 7.1 Q4 | **We do not believe that the proposed deadlines for reporting financial stability templates are feasible.**<br><br>In order to fulfil financial stability reporting requirements, group and solo undertakings would need time to perform the necessary calculations and in the case of groups, filter this information up to the parent undertaking level. Without this information, group reporting would not be possible.<br><br>Please refer to paragraph 3.7 for comments regarding the impact on solo deadlines.<br><br>**We would welcome a discussion with EIOPA on whether some targeted information from the QRTs can be made available faster than what is anticipated currently under Solvency II, but it is clear that the proposed deadlines in this consultation are unfeasible for groups.** | |
| 7.1 Q5 | We see the benefits of pre-defined systematic reporting in terms of building automated systems which would reduce man-hours in the longer term. However, mostly due to shorter deadlines, we see that these requirements would fall outside the scope of systematic reporting and therefore always require manual effort. | |

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| Technical Annex | | |
| FS 1 - A1 | ***EIOPA purpose: assess potential liquidity drain due to policyholder behaviour i.e. a run on an insurer.***<br><br>**Financial stability information should be targeted and fit for purpose; otherwise the industry will be subject to unnecessary burden.**<br><br>It is not clear to us how certain financial stability requirements fully reflect the risks to which the (re)insurance industry is exposed, for example mass lapses. Requirements should reflect the nature of the (re)insurance industry and the risks which may/may not materialise. The exact scenarios which exist for banks are not necessarily applicable for (re)insurers, or impact the industry in the same way.<br><br>**A "run on an insurer" is not a risk which insurers are as exposed to in comparison to banks**. (Re)insurance undertakings design products in such a way that policy holders are dis-incentivised from lapsing, via penalties for examples. We do not therefore see this as a big risk for the (re)insurance industry.<br><br>Also, (re)insurers do not have severe problems with mismatch issues due to assets/liability matching strategies. For banks, it is not always the case that assets/liabilities are matched over the entire duration therefore a "run" will have greater consequences.<br><br>The concepts of lapses and surrenders could be subject to different interpretations. We query if the intention is to ensure consistency with the definition used under Solvency II for lapses, surrenders or paid-up?<br><br>The definition of a single contract may also vary across undertakings: life; non-life; direct; (re)insurance which may therefore cause significant differences in the order of magnitude of the proposed indicators. Also combining different types of (re)insurance products (life & non-life) at a consolidated Group level would make little sense. | |

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| | The lapse rate may be low/nil on the (re)insurance side therefore diluting the possibility of making industry-wide assumptions. This comment applies to all situations where a limited number of lapses would not significantly influence the liquidity position of the group.<br><br>Further guidance by EIOPA is needed on how to report information on non-EEA (re)insurance entities. | |
| FS 1 – A2 | ***EIOPA purpose: assess potential liquidity drain due to policyholder behaviour i.e. a run on an insurer.***<br><br>Please refer to paragraph FS 1 – A1 for general comments on quarterly reporting of lapse rates.<br><br>Again, we find that the deadlines are too strict. Any information deriving directly from technical provisions should not be required on a quarterly basis. | |
| FS 1 – A3 | ***EIOPA purpose: indicator for profitability from balance sheet perspective.***<br><br>Please refer to 7.1 Q2 for comments on P&L requirements.<br><br>**It is unlikely that information deriving from P&L statutory accounts will be available in time for the purpose of these templates.**<br><br>Financial reporting frameworks vary per country (depending on whether IFRS or local GAAP is used as the basis for accounting) and per undertaking (whether the undertaking is listed and obliged to disclose financial reporting statements quarterly).<br><br>It is therefore questionable whether the information relating to P&L accounts will be available at the frequency, and within the deadlines proposed, for the financial stability templates. | |

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| FS 1 – A4 | ***EIOPA purpose: indicator for profitability from P&L perspective.***<br><br>Financial reporting frameworks vary per country (depending on whether IFRS or local GAAP is used as the basis for accounting) and per undertaking (whether the undertaking is listed and obliged to disclose financial reporting statements quarterly).<br><br>Under the QRTs package, EIOPA foresee quarterly reporting of the balance sheet only when the reconciliation reserve cannot be explained. We therefore query EIOPA's change of direction with regards to financial stability reporting.<br><br>Our comments in paragraph 7.1 Q2 with regards to deadlines and statutory accounting requirements apply here. | |
| FS 1 – A5 | ***EIOPA purpose: indicator for profitability from balance sheet perspective – technical accounts and investments.***<br><br>Our comments in paragraph 7.1 Q2 with regards to deadlines and statutory accounting requirements apply here. | |
| FS 1 – A6 | ***EIOPA purpose: degree to which losses are passed to customers.***<br><br>Our comments in paragraph 7.1 Q2 with regards to deadlines and statutory accounting requirements apply here. | |
| FS 1 – A7 | ***EIOPA purpose: indicator for interest rate sensitivity of technical liabilities – risk-mitigating effects of hedging via derivatives – potential A/L mismatches.***<br><br>The duration will not take into consideration the monetary aspect where you could assume that the reserves in commercial/industrial business are much larger than in private business. Determining duration of all liabilities, particularly at group level will be a very onerous task. | |

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| FS 1 – A8 | ***EIOPA purpose: indicator for interest rate sensitivity of technical liabilities – risk-mitigating effects of hedging via derivatives – potential A/L mismatches.***<br><br>Please refer to paragraph FS 1 – A7. | |
| FS 1 – A9 | ***EIOPA purpose: indicate capital/risk profile of the sector and structure of changes in the profile.***<br><br>Please refer to paragraph 6.21 to 6.28. | |
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| Assets - D1Q- cell A20 (list) | | |
| Assets - D1Q- cell A22 (list) | | |
| Assets - D1Q- cell A23 (list) | | |
| Assets - D1Q- cell A24 (list) | | |
| Assets - D1Q- cell A25 (list) | | |
| Assets - D1Q- cell A26 (list) | | |
| Assets - D1Q- cell A28 (list) | | |
| Assets - D1Q- cell A30 (list) | | |
| Assets - D2O- cell A1 | | |
| Assets - D2O- cell A2 | | |
| Assets - D2O- cell A3 | | |
| Assets - D2O- cell A4 | | |
| Assets - D2O- cell A5 | | |
| Assets - D2O- cell A6 | | |
| Assets - D2O- cell A7 | | |
| Assets - D2O- cell A8 | | |
| Assets - D2O- cell A9 | | |
| Assets - D2O- cell A10 | | |

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|---|---|---|
| Assets - D2O- cell A11 | | |
| Assets - D2O- cell A13 | | |
| Assets - D2O- cell A14 | | |
| Assets - D2O- cell A15 | | |
| Assets - D2O- cell A16 | | |
| Assets - D2O- cell A17 | | |
| Assets - D2O- cell A19 | | |
| Assets - D2O- cell A20 | | |
| Assets - D2O- cell A21 | | |
| Assets - D2O- cell A22 | | |
| Assets - D2O- cell A23 | | |
| Assets - D2O- cell A24 | | |
| Assets - D2O- cell A25 | | |
| Assets - D2O- cell A26 | | |
| Assets - D2O- cell A27 | | |
| Assets - D2O- cell A28 | | |
| Assets - D2O- cell A29 | | |
| Assets - D2O- cell A31 | | |
| Assets - D2O- cell A32 | | |
| Assets - D2O- cell A33 | | |
| Assets - D2O- cell A34 | | |
| Assets - D2O- cell A35 | | |
| Assets - D3- cell A1 | | |
| Assets - D3- cell A3 | | |
| Assets - D3- cell A4 | | |
| Assets - D3- cell A6 | | |

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|---|---|---|
| Assets - D3- cell A7 | | |
| Assets - D3- cell A8 | | |
| Assets - D3- cell A15 | | |
| Assets - D4- cell A1 | | |
| Assets - D4- cell A2 | | |
| Assets - D4- cell A3 | | |
| Assets - D4- cell A4 | | |
| Assets - D4- cell A5 | | |
| Assets - D4- cell A6 | | |
| Assets - D4- cell A7 | | |
| Assets - D4- cell A8 | | |
| Assets - D5- cell A1 | | |
| Assets - D5- cell A2 | | |
| Assets - D5- cell A3 | | |
| Assets - D5- cell A4 | | |
| Assets - D5- cell A5 | | |
| Assets - D5- cell A6 | | |
| Assets - D5- cell A7 | | |
| Assets - D5- cell A8 | | |
| Assets - D5- cell A9 | | |
| Assets - D5- cell A10 | | |
| Assets - D5- cell A11 | | |
| Assets - D5- cell A12 | | |
| Assets - D5- cell A13 | | |
| Assets - D5- cell A14 | | |
| TP - F1Q- cell A1 | | |

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|---|---|---|
| TP – F1Q- cell A3 | | |
| TP – F1Q- cell A5 | | |
| TP – F1Q- cell A6 | | |
| TP – F1Q- cell A7 | | |
| TP – F1Q- cell A9 | | |
| TP – F1Q- cell A10 | | |
| TP – F1Q- cell A12 | | |
| TP – F1Q- cell A13 | | |
| TP – F1Q- cell A14 | | |
| TP - F1Q- cell B1 | | |
| TP - F1Q- cell B2 | | |
| TP - F1Q- cell B3 | | |
| TP - F1Q- cell B4 | | |
| TP - F1Q- cell B5 | | |
| TP - F1Q- cell B6 | | |
| TP - F1Q- cell B7 | | |
| TP - F1Q- cell B9 | | |
| TP - F1Q- cell B10 | | |
| TP - F1Q- cell B11 | | |
| TP - F1Q- cell B12 | | |
| TP - F1Q- cell B13 | | |
| TP - F1Q- cell B14 | | |
| TP - F1Q- cell C1 | | |
| TP - F1Q- cell C2 | | |
| TP - F1Q- cell C3 | | |
| TP - F1Q- cell C4 | | |

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|---|---|---|
| TP - F1Q- cell C5 | | |
| TP - F1Q- cell C6 | | |
| TP - F1Q- cell C7 | | |
| TP - F1Q- cell B9 | | |
| TP - F1Q- cell C10 | | |
| TP - F1Q- cell C11 | | |
| TP - F1Q- cell C12 | | |
| TP - F1Q- cell C13 | | |
| TP - F1Q- cell C14 | | |
| TP - F1Q- cell E1 | | |
| TP - F1Q- cell E2 | | |
| TP - F1Q- cell E4 | | |
| TP - F1Q- cell E6 | | |
| TP - F1Q- cell E7 | | |
| TP - F1Q- cell E9 | | |
| TP - F1Q- cell E10 | | |
| TP - F1Q- cell E12 | | |
| TP - F1Q- cell E13 | | |
| TP - F1Q- cell E14 | | |
| TP - F3- cell A21 | | |
| TP - F3- cell A30 | | |
| TP - E1Q- cell A11 | | |
| TP -E1Q- cell B11 | | |
| TP -E1Q- cell C11 | | |
| TP - E1Q- cell D11 | | |
| TP -E1Q- cell E11 | | |

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|---|---|---|
| TP -E1Q- cell F11 | | |
| TP - E1Q- cell G11 | | |
| TP -E1Q- cell H11 | | |
| TP -E1Q- cell I11 | | |
| TP - E1Q- cell L11 | | |
| TP -E1Q- cell M11 | | |
| TP -E1Q- cell N11 | | |
| TP - E1Q- cell P11 | | |
| TP - E1Q- cell P11 | | |
| TP -E1Q- cell Q11 | | |
| TP - E1Q- cell R11 | | |
| TP - E1Q- cell **Q11** | | |
| TP - E1Q- cell A12 | | |
| TP -E1Q- cell B12 | | |
| TP -E1Q- cell C12 | | |
| TP - E1Q- cell D12 | | |
| TP -E1Q- cell E12 | | |
| TP -E1Q- cell F12 | | |
| TP - E1Q- cell G12 | | |
| TP -E1Q- cell H12 | | |
| TP -E1Q- cell I12 | | |
| TP - E1Q- cell L12 | | |
| TP -E1Q- cell M12 | | |
| TP -E1Q- cell N12 | | |
| TP - E1Q- cell O12 | | |
| TP - E1Q- cell P12 | | |

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|---|---|---|
| TP -E1Q- cell Q12 | | |
| TP - E1Q- cell R12 | | |
| TP - E1Q- cell **Q12** | | |
| TP - E1Q- cell A13 | | |
| TP -E1Q- cell B13 | | |
| TP -E1Q- cell C13 | | |
| TP - E1Q- cell D13 | | |
| TP -E1Q- cell E13 | | |
| TP -E1Q- cell F13 | | |
| TP - E1Q- cell G13 | | |
| TP -E1Q- cell H13 | | |
| TP -E1Q- cell I13 | | |
| TP - E1Q- cell L13 | | |
| TP -E1Q- cell M13 | | |
| TP -E1Q- cell N13 | | |
| TP - E1Q- cell O13 | | |
| TP - E1Q- cell P13 | | |
| TP -E1Q- cell Q13 | | |
| TP - E1Q- cell R13 | | |
| TP - E1Q- cell **Q13** | | |
| Re - J2- cell H1 | | |
| Re - J2- cell X1 | | |
| Re - J2- cell Y1 | | |
| Re - J2- cell AG1 | | |
| Re - J2- cell AP1 | | |
| Re - J3- cell B1 | | |

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|---|---|---|
| Re - J3- cell N1 | | |
| Re - J3- cell O1 | | |
| Re - J3- cell S1 | | |