

Comments Template on Draft proposal for Quantitative Reporting Templates		Deadline 20 January 2012 12:00 CET
Name of Company:	Federation of Finnish Financial Services	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ Do not change the numbering in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool ⇒ Leave the last column <u>empty</u>. ⇒ 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>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <ul style="list-style-type: none"> ○ Certain rows represent a group of cells with similar information (ex : TP - E3- cells A17-A31-J16 for a given triangle in TP-E3) ○ Cells that refer to formulas are not mentioned in specific rows; in case you have comments on formulas, please make them in the cell "general" for the given template ○ 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 interal consistency purposes ○ 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. ○ If your comment refers to subparagraphs or specific cells within a group, please indicate this in the comment itself. <p>Please send the completed template, in Word Format, to cp009@eiopa.europa.eu. Our IT tool does not allow processing of any other</p>		

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formats.

The numbering of the paragraphs refers to this Consultation Paper, the numbering of cells refers to the accompanying spreadsheets and LOGs, the reference to "General", "Purpose", etc. refers to summary documents.

Reference	Comment	
General Comment	<p>Articles on which the reports are based would be clarifying.</p> <p>The sign notation has not been properly specified in the templates. It would be easier e.g. for checking purposes to specify + into the undertaking and - from the undertaking.</p> <p>It would be appreciated if changes to these templates would be somehow shown by EIOPA, Because undertakings will start doing definitions to their system based on these templates (which are consulted now).</p>	
3.1		
3.2		
3.3		
3.4		
3.5		
3.6		
4.1		
4.2		
4.3		

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4.4		
4.5		
4.6		
4.7		
4.8		
4.9		
4.10		
4.11		
Technical Annex (only for inconsistencies)		
BS-C1 – General	Regarding field A16 (Not found in the comment template.): Should cell A20 (Reinsurance receivables) really be included in the sum showed in this field? It is not in line with reinsurance report J3 cell N1 (Total reinsurance recoverables).	
BS-C1 – Purpose		
BS-C1 – Benefits		
BS-C1 – Costs		
BS-C1 – Groups		
BS-C1 – Materiality		
BS-C1 - Disclosure		
BS-C1 – Frequency	We see a need to report the Balance sheet on quarterly basis as it is needed to report the OF report. It also adds value to the data quality verification.	
BS-C1 – cell AS1		
BS-C1- cell AS24		
BS-C1- cell A2		
BS-C1- cell AS2		

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BS-C1- cell A26		
BS-C1- cell AS26		
BS-C1- cell A25B		
BS-C1- cell AS25B		
BS-C1- cell A3		
BS-C1- cell AS3		
BS-C1- cell A5		
BS-C1- cell AS5		
BS-C1- cell A6		
BS-C1- cell AS6		
BS-C1- cell A7	No split should be made between listed and unlisted – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell AS7	No split should be made between listed and unlisted – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell A7A	No split should be made between listed and unlisted – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell AS7A	No split should be made between listed and unlisted – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell A8	No split should be made between government and corporate bonds – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell AS8	No split should be made between government and corporate bonds – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell A8A	No split should be made between government and corporate bonds – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell AS8A	No split should be made between government and corporate bonds – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell A8C		
BS-C1- cell AS8C		
BS-C1- cell A8D		
BS-C1- cell AS8D		

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BS-C1- cell AS9	<p>Comment to A9A- A9F: This classification results in additional work because of the level of detail and it will not provide a transparent Balance Sheet from the reader's point of view.</p> <p>Does this need to be specified in the Balance Sheet? The information which is requested here will be gathered by calling/contacting each fund company where we have our holding in. Then the fund companies must estimate each fund which means that the figures will not be reliable during the reporting period. Correct amounts will be with one-quarter drop.</p> <p>Another issue which is very unclear with this reporting is how we should deal with the currency effects when for example we have a fund booked in EUR but the underlying instruments are in a couple of different currencies. How can you break down this fund into the underlying instruments in accounting? How should the currency issue be handled/reported?</p> <p>In purpose column it would be better to say <u>Assets – D4 report</u> as in other guidelines of other cells in order not to wonder what D4.</p>	
BS-C1- cell AS9A		
BS-C1- cell AS9B		
BS-C1- cell AS9C		
BS-C1- cell AS9D		
BS-C1- cell AS9E		
BS-C1- cell AS9F		
BS-C1- cell A10A		
BS-C1- cell AS10A		
BS-C1- cell A10B		
BS-C1- cell AS10B		
BS-C1- cell A14	<p>A14 is Loans & mortgages (except loans on policies) in assets side. There is also the field AS14 (Other technical provisions) in the liability side – is this really correct? Shouldn't it be LS14 on liability side instead?</p>	

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	Other technical provisions is to be disclosed only in statutory accounts value, it must cover e.g. equalisation provision/ reserve, mustn't it?	
BS-C1- cell AS14		
BS-C1- cell A11		
BS-C1- cell AS11		
BS-C1- cell A12		
BS-C1- cell AS12		
BS-C1- cell A14A		
BS-C1- cell AS14A		
BS-C1- cell A17	A17-A19A: Reinsurance recoverable should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell AS17	Reinsurance recoverable should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell A18	Reinsurance recoverable should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell AS18	Reinsurance recoverable should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell A18A	Reinsurance recoverable should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell AS18A	Reinsurance recoverable should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell A19	Reinsurance recoverable should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell AS19	Reinsurance recoverable should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell A19A	Reinsurance recoverable should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell AS19A		
BS-C1- cell A13		

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BS-C1- cell AS13		
BS-C1- cell A21		
BS-C1- cell AS21		
BS-C1- cell A20		
BS-C1- cell AS20		
BS-C1- cell A23		
BS-C1- cell AS23		
BS-C1- cell A27		
BS-C1- cell AS27		
BS-C1- cell A29		
BS-C1- cell AS29		
BS-C1- cell LS1	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell L1A	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell L2	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell L3	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell LS4	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell L4A	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell L5	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell L6	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell LS6B	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	

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	will decrease the overview of the Balance sheet.	
BS-C1- cell L6C	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell L6D	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell L6E	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell LS7	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell L7A	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell L8	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell L9	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell LS10	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell L10A	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell L11	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell L12	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell L23		
BS-C1- cell L18		
BS-C1- cell LS18		
BS-C1- cell L22		
BS-C1- cell LS22		
BS-C1- cell L13		

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BS-C1- cell LS13		
BS-C1- cell L17		
BS-C1- cell LS17		
BS-C1- cell L16		
BS-C1- cell LS16		
BS-C1- cell L19		
BS-C1- cell LS19		
BS-C1- cell L20		
BS-C1- cell LS20		
BS-C1- cell L15A		
BS-C1- cell LS15A		
BS-C1- cell L15B		
BS-C1- cell LS15B		
BS-C1- cell L15C		
BS-C1- cell LS15C		
BS-C1- cell L15D		
BS-C1- cell LS15D		
BS-C1- cell L25		
BS-C1- cell LS25		
BS-C1- cell L26		
BS-C1B – General		
BS-C1B – Purpose		
BS-C1B – Benefits		
BS-C1B – Costs		
BS-C1B – Groups		

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BS-C1B – Materiality		
BS-C1B - Disclosure		
BS-C1B – Frequency		
BS-C1B- cell A2		
BS-C1B- cell A3A		
BS-C1B- cell A3C		
BS-C1B- cell B3C		
BS-C1B- cell C3C		
BS-C1B- cell D3C		
BS-C1B- cell A3B		
BS-C1B- cell B3B		
BS-C1B- cell A10		
BS-C1B- cell B10		
BS-C1B- cell A12A		
BS-C1B- cell B12A		
BS-C1B- cell A13		
BS-C1B- cell B13		
BS-C1B- cell A13A		
BS-C1B- cell B13A		
BS-C1B- cell A14		
BS-C1B- cell B14		
BS-C1B- cell A15A		
BS-C1B- cell B15A		
BS-C1B- cell A17		
BS-C1B- cell B17		
BS-C1B- cell A17A		

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BS-C1B- cell B17A		
BS-C1B- cell A18		
BS-C1B- cell A5		
BS-C1B- cell A9A		
BS-C1B- cell A9B		
BS-C1B- cell B9B		
BS-C1B- cell C9B		
BS-C1B- cell A19		
BS-C1B- cell B19		
BS-C1D – General		
BS-C1D – Purpose	<p>It is said that this template aims at giving an overview of currency mismatches between assets and liabilities and of potential currency risks. If the undertaking has hedged currency risks with derivatives this template does not give a right picture. There should e.g. a row telling the amount of assets / liabilities that is hedged with derivatives / nominal value of derivatives.</p> <p>What are supervisors getting out of this? This is not based on level 2. What is thought to be benefit of this?</p>	
BS-C1D – Benefits		
BS-C1D – Costs		
BS-C1D – Groups		
BS-C1D – Materiality		
BS-C1D - Disclosure		
BS-C1D – Frequency		
BS-C1D- cell A1		
BS-C1D- cell B1		

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BS-C1D- cell C1		
BS-C1D- cell D1		
BS-C1D- cell E1		
BS-C1D- cell A3		
BS-C1D- cell A4		
BS-C1D- cell A5		
BS-C1D- cell A5A		
BS-C1D- cell A6		
BS-C1D- cell A7		
BS-C1D- cell A8		
BS-C1D- cell A9		
BS-C1D- cell A10		
BS-C1D- cell A11		
BS-C1D- cell A12		
BS-C1D- cell A13		
BS-C1D- cell A14		
BS-C1D- cell A16		
Country - K1- General	<p>What should be filled in column FPS? If it is up to underwriting place it will go always to the Home country, if there is no branch.</p> <p>Article 159 of the Framework Directive requires “the amount of premiums, claims and commissions, without deduction of reinsurance”. Therefore this template should be restricted to direct business only. (Direct) insurance undertakings might also accept reinsurance business, but as the template is not applicable for reinsurance undertakings, the information should exclude accepted reinsurance business.</p>	

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Country - K1- Purpose		
Country - K1- Benefits		
Country - K1- Costs		
Country - K1- Groups		
Country - K1- Materiality	<p>There should also be a threshold related to EEA-jurisdictions. Companies, whose FPS activities are immaterial (mainly serving local companies that have established foreign activities) haven't built their systems to deliver this kind of detailed information.</p> <p>We think that 25 M€ of premiums is quite small.</p>	
Country - K1- Disclosure		
Country - K1- Frequency		
Country - K1- cell A1		
Country - K1- cell A2		
Country - K1- cell A3		
Country - K1- cell A4		
Country - K1- cell C1		
Country - K1- cell C2		
Country - K1- cell C3		
Country - K1- cell C4		
Country - K1- cell E1	Is this only commissions [? Or also other expenses – hopefully not because there is not information on other acquisition costs by FPS state in GL, if FPS is not included in home country.	
Country - K1- cell E2	See comment in E1.	
Country - K1- cell E3	See comment in E1.	
Country - K1- cell E4	See comment in E1.	
Country - K1- cell H1	Why Motor Vehicle Liability is taken separately here ?	
Country - K1- cell H2		
Country - K1- cell H3		

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Country - K1- cell H1A	See comment in H1.	
Country - K1- cell H2A		
Country - K1- cell H3A		
Cover - A1A & Q- General	<p>As there is only a Balance Sheet in Solvency II, we assume that this information is based on the financial accounts but LoB is as defined for SII purposes. This is an additional burden to compile for undertakings. Is it really needed as we have in the financial statements result by group of EU insurance classes that is quite similar to this?</p> <p>Terminology should be consistent with accounting terminology, if templates are based on financial accounts.</p> <p>The required allocation of cost differs from the one usually used.</p> <p>We do the bookkeeping based on accrual concept – not cash basis. Therefore our book keeping system does not keep track of expenses paid.</p> <p>High implementation costs are expected because of the required split of expenses paid (administrative, investment management, claims management etc. expenses) per SII LOB. The required breakdown deviates from the current accounting approach. This template leads to double calculation (SII LOBS and accounting LOBS) based on different bases (cash and accrual).</p> <p>Premiums and claims for countries where risk is located could not be found in the GL. If this is going to be reported it has to be based on internal assumptions. Do such assumptions fulfil any supervisory purpose?</p> <p>Reporting the only latest quarter premiums is not consistent with other quarter reportings.</p>	

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	<p>Localization of risk is difficult to provide. Some (re)insurance contracts may cover several risk locations. In case majority of company's risks (for example > 95%) are located in home country, the information is not relevant and it should not be required.</p> <p>Why claims paid does not include here salvage and subrogation? In GL they are included in paid claims.</p>	
Cover - A1A & Q- Purpose		
Cover - A1A & Q- Benefits		
Cover - A1A & Q- Costs		
Cover - A1A & Q- Groups		
Cover - A1A & Q- Materiality	The threshold for data by country is really important for undertakings whose foreign activities are immaterial (mainly serving local companies that has established foreign activities). Could there even be an EUR amount threshold to avoid immaterial amounts to be required to be reported?	
Cover - A1A & Q- Disclosure	We support EIOPA's move towards developing a simplified template for public disclosure however the definitions used must be consistent with IFRS.	
Cover - A1A & Q- Frequency		
Cover - A1A- cell A1		
Cover - A1A- cell A2		
Cover - A1A- cell A3		
Cover - A1A- cell A4		
Cover - A1A- cell A5		
Cover - A1A- cell A6		
Cover - A1A- cell A7		
Cover - A1A- cell A8		
Cover - A1A- cell A9		
Cover - A1A- cell A10		

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Cover - A1A- cell A11		
Cover - A1A- cell A12		
Cover - A1A- cell A19		
Cover - A1A- cell A20		
Cover - A1A- cell A21		
Cover - A1A- cell A22		
Cover - A1A- cell A23		
Cover - A1A- cell B1		
Cover - A1A- cell B2		
Cover - A1A- cell C1		
Cover - A1A- cell A1A		
Cover - A1A- cell B1A		
Cover - A1A- cell C1A		
Cover - A1A- cell E1		
Cover - A1A- cell F1		
Cover - A1A- cell G1		
Cover - A1A- cell E1A		
Cover - A1A- cell F1A		
Cover - A1A- cell G1A	The allocation of expenses for reinsurance doesn't reflect the nature of non-proportional lines and therefore the results may be artificial and inconsistent between company's.	
Cover - A1A- cell E1B	Comment is only for non-life insurance: The required split into gross-direct business, gross reinsurance accepted and reinsurers share is not carried out by many insurers. We propose to report the investment management expense in total instead.	
Cover - A1A- cell F1B	See comment in E1B	
Cover - A1A- cell G1B	Comment is only for non-life insurance : The allocation of expenses for reinsurance doesn't reflect	

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	the nature of non-proportional lines and therefore the results may be artificial and inconsistent between company's. See comment in E1B.	
Cover - A1A- cell E1C		
Cover - A1A- cell F1C		
Cover - A1A- cell G1C	Comment is only for non-life insurance : The allocation of expenses for reinsurance doesn't reflect the nature of non-proportional lines and therefore the results may be artificial and inconsistent between company's.	
Cover - A1A- cell E1D		
Cover - A1A- cell F1D		
Cover - A1A- cell G1D	Comment is only for non-life insurance : The allocation of expenses for reinsurance doesn't reflect the nature of non-proportional lines and therefore the results may be artificial and inconsistent between company's.	
Cover - A1A- cell E1E		
Cover - A1A- cell F1E		
Cover - A1A- cell G1E	Comment is only for non-life insurance : The allocation of expenses for reinsurance doesn't reflect the nature of non-proportional lines and therefore the results may be artificial and inconsistent between company's.	
Cover - A1A- cell I1		
Cover - A1A- cell I2		
Cover - A1A- cell I3		
Cover - A1A- cell I3A		
Cover - A1A- cell I3B		
Cover - A1A- cell I4		
Cover - A1A- cell I5		
Cover - A1A- cell I6		
Cover - A1A- cell I7		

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Cover - A1A- cell I8		
Cover - A1A- cell I9		
Cover - A1A- cell I10		
Cover - A1A- cell I11		
Cover - A1A- cell J1	The non-proportional reinsurance can not be allocated. The line should be removed.	
Cover - A1A- cell I11A	Cell I1A : The premium written is not clearly specified. There's on row for it but 2 specifications: Earned premiums in any 12 months and Earned premiums. the first is for risk exposure and part of written premium and the latter due to received in the period and for also to all expenses and commissions but excluding the cherges. We don't know what is wanted. The quarter report needs 3 months?	
Cover - A1A- cell J1A		
Cover - A1A- cell L1		
Cover - A1A- cell M1		
Cover - A1A- cell L1A		
Cover - A1A- cell M1A		
Cover - A1A- cell O1		
Cover - A1A- cell P1		
Cover - A1A- cell O1A		
Cover - A1A- cell P1A		
Cover - A1A- cell O1B		
Cover - A1A- cell P1B		
Cover - A1A- cell O1C		
Cover - A1A- cell P1C		
Cover - A1Q- cell A1		
Cover - A1Q- cell A2		
Cover - A1Q- cell A3		
Cover - A1Q- cell A4		

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Cover - A1Q- cell A5		
Cover - A1Q- cell A6		
Cover - A1Q- cell A7		
Cover - A1Q- cell A8		
Cover - A1Q- cell A9		
Cover - A1Q- cell A10		
Cover - A1Q- cell A11		
Cover - A1Q- cell A12		
Cover - A1Q- cell A19		
Cover - A1Q- cell A20		
Cover - A1Q- cell A21		
Cover - A1Q- cell A22		
Cover - A1Q- cell A23		
Cover - A1Q- cell B1		
Cover - A1Q- cell B2		
Cover - A1Q- cell C1		
Cover - A1Q- cell E1		
Cover - A1Q- cell F1		
Cover - A1Q- cell G1		
Cover - A1Q- cell E1Z		
Cover - A1Q- cell F1Z		
Cover - A1Q- cell G1Z		
Cover - A1Q- cell I1		
Cover - A1Q- cell I2		
Cover - A1Q- cell I3		
Cover - A1Q- cell I3A		

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Cover - A1Q- cell I3B		
Cover - A1Q- cell I4		
Cover - A1Q- cell I5		
Cover - A1Q- cell I6		
Cover - A1Q- cell I7		
Cover - A1Q- cell I8		
Cover - A1Q- cell I9		
Cover - A1Q- cell I10		
Cover - A1Q- cell I11		
Cover - A1Q- cell L1		
Cover - A1Q- cell M1		
Cover - A1Q- cell L1Z		
Cover - A1Q- cell M1Z		
OF - B1A & B1Q – General		
OF - B1A & B1Q – Purpose		
OF - B1A & B1Q – Benefits		
OF - B1A & B1Q – Costs		
OF - B1A & B1Q – Groups		
OF - B1A & B1Q – Materiality		
OF - B1A & B1Q - Disclosure		
OF - B1A & B1Q – Frequency		
OF - B1A- cell C1A		
OF - B1A- cell B5		
OF - B1A- cell C5		
OF - B1A- cell D5		

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OF - B1A- cell B6		
OF - B1A- cell B10		
OF - B1A- cell C10		
OF - B1A- cell D10		
OF - B1A- cell B11		
OF - B1A- cell C11		
OF - B1A- cell B14		
OF - B1A- cell C14		
OF - B1A- cell B17		
OF - B1A- cell C17		
OF - B1A- cell D17		
OF - B1A- cell B18		
OF - B1A- cell C18		
OF - B1A- cell D18		
OF - B1A- cell D14		
OF - B1A- cell D11		
OF - B1A- cell D15		
OF - B1A- cell B25		
OF - B1A- cell B30	<p>This information should not be disclosed publicly, because the EPIFP is of no additional benefit for the public and is sensitive competitive information.</p> <p>EPIFP is calculated by not allowing offsets between HRG's. HRG is not and cannot not be publicly disclosed segmentation; there may be thousands of HRG according to L2 Articles 28(2) and 29. The undertaking cannot publish figures whose basis is not public.</p> <p>Another alternative is to calculate EPIFP by not allowing offsets between HRG's but only LoB's.</p>	
OF - B1A- cell B31		
OF - B1A- cell C33		

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OF - B1A- cell C34		
OF - B1A- cell C35		
OF - B1A- cell D35		
OF - B1A- cell C36		
OF - B1A- cell D36		
OF - B1A- cell C37		
OF - B1A- cell C38		
OF - B1A- cell D38		
OF - B1A- cell C39		
OF - B1A- cell C40		
OF - B1A- cell D40		
OF - B1A- cell C41		
OF - B1A- cell D41		
OF - B1A- cell C42		
OF - B1A- cell D42		
OF - B1A- cell A45		
OF - B1A- cell A45A		
OF - B1A- cell A45B		
OF - B1A- cell B60		
OF - B1A- cell C60		
OF - B1A- cell B61		
OF - B1A- cell C61		
OF - B1A- cell B62		
OF - B1A- cell C62		
OF - B1A- cell B64		
OF - B1A- cell C64		

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OF - B1A- cell C65		
OF - B1A- cell B70		
OF - B1A- cell C70		
OF - B1A- cell B71		
OF - B1A- cell C71		
OF - B1A- cell B73		
OF - B1A- cell C73		
OF - B1A- cell D73		
OF - B1A- cell E73		
OF - B1A- cell F73		
OF - B1A- cell B74		
OF - B1A- cell C74		
OF - B1A- cell D74		
OF - B1A- cell E74		
OF - B1A- cell F74		
OF - B1A- cell B75		
OF - B1A- cell C75		
OF - B1A- cell D75		
OF - B1A- cell E75		
OF - B1A- cell F75		
OF - B1A- cell A77.1		
OF - B1A- cell B77.1		
OF - B1A- cell C77.1		
OF - B1A- cell D77.1		
OF - B1A- cell E77.1		

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OF - B1A- cell F77.1		
OF - B1A- cell G77.1		
OF - B1A- cell H77.1		
OF - B1A- cell I77.1		
OF - B1A- cell J77.1		
OF - B1A- cell K77.1		
OF - B1A- cell L77.1		
OF - B1A- cell M77.1		
OF - B1A- cell N77.1		
OF - B1A- cell A77.n		
OF - B1A- cell B77.n		
OF - B1A- cell C77.n		
OF - B1A- cell D77.n		
OF - B1A- cell E77.n		
OF - B1A- cell F77.n		
OF - B1A- cell G77.n		
OF - B1A- cell H77.n		
OF - B1A- cell I77.n		
OF - B1A- cell J77.n		
OF - B1A- cell K77.n		
OF - B1A- cell L77.n		
OF - B1A- cell M77.n		
OF - B1A- cell N77.n		
OF - B1A- cell B79		
OF - B1A- cell C79		
OF - B1A- cell D79		

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OF - B1A- cell E79		
OF - B1A- cell F79		
OF - B1A- cell B80		
OF - B1A- cell C80		
OF - B1A- cell D80		
OF - B1A- cell E80		
OF - B1A- cell F80		
OF - B1A- cell B81		
OF - B1A- cell C81		
OF - B1A- cell D81		
OF - B1A- cell E81		
OF - B1A- cell F81		
OF - B1A- cell B83		
OF - B1A- cell C83		
OF - B1A- cell D83		
OF - B1A- cell B84		
OF - B1A- cell C84		
OF - B1A- cell D84		
OF - B1A- cell B85		
OF - B1A- cell C85		
OF - B1A- cell D85		
OF - B1A- cell A87.1		
OF - B1A- cell B87.1		
OF - B1A- cell C87.1		
OF - B1A- cell D87.1		
OF - B1A- cell E87.1		

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OF - B1A- cell F87.1		
OF - B1A- cell G87.1		
OF - B1A- cell H87.1		
OF - B1A- cell I87.1		
OF - B1A- cell J87.1		
OF - B1A- cell K87.1		
OF - B1A- cell L87.1		
OF - B1A- cell M87.1		
OF - B1A- cell N87.1		
OF - B1A- cell A87.n		
OF - B1A- cell B87.n		
OF - B1A- cell C87.n		
OF - B1A- cell D87.n		
OF - B1A- cell E87.n		
OF - B1A- cell F87.n		
OF - B1A- cell G87.n		
OF - B1A- cell H87.n		
OF - B1A- cell I87.n		
OF - B1A- cell J87.n		
OF - B1A- cell K87.n		
OF - B1A- cell L87.n		
OF - B1A- cell M87.n		
OF - B1A- cell N87.n		
OF - B1A- cell B88		
OF - B1A- cell C88		
OF - B1A- cell B89		

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OF - B1A- cell B90		
OF - B1A- cell C90		
OF - B1A- cell B92		
OF - B1A- cell C92		
OF - B1A- cell D92		
OF - B1A- cell E92		
OF - B1A- cell F92		
OF - B1A- cell B93		
OF - B1A- cell C93		
OF - B1A- cell D93		
OF - B1A- cell E93		
OF - B1A- cell F93		
OF - B1A- cell B94		
OF - B1A- cell C94		
OF - B1A- cell D94		
OF - B1A- cell E94		
OF - B1A- cell F94		
OF - B1A- cell B96		
OF - B1A- cell C96		
OF - B1A- cell D96		
OF - B1A- cell E96		
OF - B1A- cell B97		
OF - B1A- cell C97		
OF - B1A- cell D97		
OF - B1A- cell E97		

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OF - B1A- cell B98		
OF - B1A- cell C98		
OF - B1A- cell D98		
OF - B1A- cell E98		
OF - B1A- cell A100.1		
OF - B1A- cell B100.1		
OF - B1A- cell C100.1		
OF - B1A- cell D100.1		
OF - B1A- cell E100.1		
OF - B1A- cell F100.1		
OF - B1A- cell G100.1	If the lenders of a subordinated loans are specified in E100.1-n what are the counterparties to be specified in G100.1-n?	
OF - B1A- cell H100.1		
OF - B1A- cell I100.1		
OF - B1A- cell J100.1		
OF - B1A- cell K100.1		
OF - B1A- cell L100.1		
OF - B1A- cell M100.1	We question whether « Notice » is the last point in time when the borrower of a subordinated loan is supposed to notify the lenders that it wants to pay back the loan on a call date?	
OF - B1A- cell N100.1		
OF - B1A- cell A100.n		
OF - B1A- cell B100.n		
OF - B1A- cell C100.n		
OF - B1A- cell D100.n		
OF - B1A- cell E100.n		
OF - B1A- cell F100.n		
OF - B1A- cell G100.n		

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OF - B1A- cell H100.n		
OF - B1A- cell I100.n		
OF - B1A- cell J100.n		
OF - B1A- cell K100.n		
OF - B1A- cell L100.n		
OF - B1A- cell M100.n		
OF - B1A- cell N100.n		
OF - B1A- cell B102		
OF - B1A- cell C102		
OF - B1A- cell D102		
OF - B1A- cell B103		
OF - B1A- cell C103		
OF - B1A- cell D103		
OF - B1A- cell B104		
OF - B1A- cell C104		
OF - B1A- cell D104		
OF - B1A- cell A106.1		
OF - B1A- cell B106.1		
OF - B1A- cell C106.1		
OF - B1A- cell D106.1		
OF - B1A- cell E106.1		
OF - B1A- cell F106.1		
OF - B1A- cell G106.1		
OF - B1A- cell H106.1		
OF - B1A- cell I106.1		
OF - B1A- cell J106.1		

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OF - B1A- cell K106.1		
OF - B1A- cell L106.1		
OF - B1A- cell M106.1		
OF - B1A- cell N106.1		
OF - B1A- cell A106.n		
OF - B1A- cell B106.n		
OF - B1A- cell C106.n		
OF - B1A- cell D106.n		
OF - B1A- cell E106.n		
OF - B1A- cell F106.n		
OF - B1A- cell G106.n		
OF - B1A- cell H106.n		
OF - B1A- cell I106.n		
OF - B1A- cell J106.n		
OF - B1A- cell K106.n		
OF - B1A- cell L106.n		
OF - B1A- cell M106.n		
OF - B1A- cell N106.n		
OF - B1A- cell A108		
OF - B1A- cell B108		
OF - B1A- cell C108		
OF - B1A- cell B109		
OF - B1A- cell D109		
OF - B1A- cell B110		
OF - B1A- cell C110		
OF - B1A- cell D110		

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OF - B1A- cell E110		
OF - B1A- cell B111		
OF - B1A- cell C111		
OF - B1A- cell D111		
OF - B1A- cell E111		
OF - B1A- cell A113.1		
OF - B1A- cell B113.1		
OF - B1A- cell C113.1		
OF - B1A- cell D113.1		
OF - B1A- cell E113.1		
OF - B1A- cell A113.n		
OF - B1A- cell B113.n		
OF - B1A- cell C113.n		
OF - B1A- cell D113.n		
OF - B1A- cell E113.n		
OF - B1A- cell A115.1		
OF - B1A- cell B115.1		
OF - B1A- cell D115.1		
OF - B1A- cell E115.1		
OF - B1A- cell A115.n		
OF - B1A- cell B115.n		
OF - B1A- cell D115.n		
OF - B1A- cell E115.n		
OF - B1A- cell B116		
OF - B1A- cell D116		
OF - B1A- cell E116		

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OF - B1A- cell F116		
OF - B1A- cell A130.1		
OF - B1A- cell B130.1		
OF - B1A- cell C130.1		
OF - B1A- cell D130.1		
OF - B1A- cell E130.1		
OF - B1A- cell F130.1		
OF - B1A- cell G130.1		
OF - B1A- cell H130.1		
OF - B1A- cell I130.1		
OF - B1A- cell J130.1		
OF - B1A- cell K130.1		
OF - B1A- cell L130.1		
OF - B1A- cell M130.1		
OF - B1A- cell A130.n		
OF - B1A- cell B130.n		
OF - B1A- cell C130.n		
OF - B1A- cell D130.n		
OF - B1A- cell E130.n		
OF - B1A- cell F130.n		
OF - B1A- cell G130.n		
OF - B1A- cell H130.n		
OF - B1A- cell I130.n		
OF - B1A- cell J130.n		
OF - B1A- cell K130.n		
OF - B1A- cell L130.n		

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OF - B1A- cell M130.n		
OF - B1Q- cell C1A		
OF - B1Q- cell B5		
OF - B1Q- cell C5		
OF - B1Q- cell D5		
OF - B1Q- cell B6		
OF - B1Q- cell B10		
OF - B1Q- cell C10		
OF - B1Q- cell D10		
OF - B1Q- cell B11		
OF - B1Q- cell C11		
OF - B1Q- cell B14		
OF - B1Q- cell C14		
OF - B1Q- cell B17		
OF - B1Q- cell C17		
OF - B1Q- cell D17		
OF - B1Q- cell B18		
OF - B1Q- cell C18		
OF - B1Q- cell D18		
OF - B1Q- cell D14		
OF - B1Q- cell D11		
OF - B1Q- cell D15		
OF - B1Q- cell B25		
OF - B1Q- cell B30		
OF - B1Q- cell B31		
OF - B1Q- cell C33		

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OF - B1Q- cell C34		
OF - B1Q- cell C35		
OF - B1Q- cell D35		
OF - B1Q- cell C36		
OF - B1Q- cell D36		
OF - B1Q- cell C37		
OF - B1Q- cell C38		
OF - B1Q- cell D38		
OF - B1Q- cell C39		
OF - B1Q- cell C40		
OF - B1Q- cell D40		
OF - B1Q- cell C41		
OF - B1Q- cell D41		
OF - B1Q- cell C42		
OF - B1Q- cell D42		
OF - B1Q- cell A45		
OF - B1Q- cell A45A		
OF - B1Q- cell A45B		
VA - C2A- General	<p>We propose to delay this template. It is because every company should create themselves their own internal reporting systems, and that should be enough also to the supervisors. This kind of templates also need testing with real numbers. There seems to be mismatch between VA-templates and others.</p> <p>These templates require re-calculations when parameters change.</p> <p>Reporting of these should be removed to the future when companies have more experience of Solvency II and they have had time to build their internal reporting systems.</p> <p>Applying to groups is very burdensome (time, resources, IT-system,etc.)</p>	

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	<p>The templates are still based on underwriting year, which is not available in existing reporting systems that are based on the accident year. For a non-life company there is no difference in risk whether insurance is underwritten in current or prior year. This is not a major risk driver why this split is unnecessary.</p> <p>The Analysis templates regarding cash flows are difficult to understand. What is information on cash-flows during the reporting period? We do not understand the rows? Difficult to say if it is possible or impossible to report them.</p> <p>(There's no place to comment V1...22) It seems that the references for cells have been made for some old version of OF – B1A V2 should refer to OF – B1A cell A69 and A72, not D65 and A65. V3 should refer to OF – B1A cell D66 and A66, not D71/75 and A71/75. V5 line 163 must be replace by 146. V6 line 200 must be replace by 189+190. V7 should refer to OF – B1A cell D95 and A99, not F83 and A83. Please, check the rest of cells ...</p>	
VA – C2A – Purpose	We see the purpose of specifying changes in OF that are due to SII adjustments – but most of the changes between balance b/fwd and balance c/fwd are related to changes that is shown in the legal P&L account and should not be reported here.	
VA – C2A – Benefits	It is difficult to see any benefits in double reporting, where additional reporting is just for the supervision, not used by the industry itself. Most likely the industry uses the statutory P&L to describe changes in equity.	
VA – C2A - Costs	All reporting is currently done based on accident year. Developing reporting based on UW-year will mean extremely high cost. To maintain and run double reporting systems will also mean high additional costs.	
VA – C2A – Groups		
VA - C2A – Materiality		
VA - C2A – Disclosure		

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VA – C2A – Frequency		
VA - C2B- General	<p>Applying to groups is very burdensome (time, resources, IT-system,etc.)</p> <p>Further clarification required: - How different types of derivatives should be handled on this template.</p> <p>Should the values in the cell 01 and 05 Opening and Closing investments Balance sheet be dirty values or clean values? Please see the CEA's comments in the ASSET – D1 – Cell A26 Total S II amount.</p> <p>Guidance on filling templates is in too general level, it will lead to non-harmonised outcome.</p> <p>It does not have any meaning for business when something is purchased, only result has the meaning.</p> <p>This is not reasonable for company's real investment business. It will require big changes for systems, and it won't match with companies' follow up of investments.</p> <p>What is the purpose of reporting of these changes in key figures? This approach will imply a big investment. We will need an additional general ledger – Solvency II ledger – to fulfil this reporting. This additional ledger requires a cash-based accounting, a total different approach from today's accounting principles within the company. How should the reporting be done when company uses an average balance principle? Having investments in several currencies make it more complicated and more expensive to implement.</p>	
VA – C2B – Purpose	This report will not fulfil the purpose. 1) Revenues (interests) in ordinary P&L are not cash flow based, 2) expenses related to investments are not cash flow based.	
VA – C2B – Benefits		
VA – C2B - Costs		

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VA - C2B - Groups		
VA - C2B - Materiality		
VA - C2B - Disclosure		
VA - C2B - Frequency		
VA C2B - cell AA2	There are also negative cash flows from derivatives, should those be in this cell or should all derivatives be handled net in cell A1 or A4. See general comments.	
VA C2B -cell A1	Does this include all the returns from derivatives? In the LOG document stands: "Also aplicable to derivatives generating cash flows". Please compare to Asset D3- A7: "Also applicable to derivatives generating interest flows" See general comments.	
VA C2B -cell A2	Should dividents be gross or net?	
VA C2B -cell A3		
VA C2B -cell A4	Should other derivatives than interest generating detivatives be reported here? See A1.	
VA C2B -cell A6	<p>It is difficult to separate changes in valuation of assets between held at opening balance sheet and acquired during the period. Especially in situations where we have some instrument in the portfolio already in the beginning of year and then we buy more and sell some after that and buy more etc. . In portfolio where average price principle is used it is not possible to report the changes separately. What is the meaning with this separation or could cells A6 and A8 be only one line? (if this is the only way to do it) We do not see this kind of split useful for internal purposes.</p> <p>The best solution would be to classify these by property classes. This applies to A6-A8 if VA can't be postponed.</p>	
VA C2B -cell A7	<p>Unclear about what should be reported here.</p> <p>Should capital reductions and redemptions be reported here and also the variation margin of derivatives which are received or paid on a daily basis although they are not sold or closed.</p>	

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VA C2B -cell A8	See A6	
VA C2B -cell O1		
VA C2B -cell O2		
VA C2B -cell O3	Should the capital reductions and redemptions be handled here as sale like in cell A7?	
VA - C2C- General	<p>Applying to groups is very burdensome (time, resources, IT-system,etc.)</p> <p>Separate templates for direct and reinsurance businesses.</p> <p>It is difficult to report the reinsurance to new and old business. The reinsurance template should be simpler.</p> <p>We are not and will not be able to report premiums, claims and expenses divided into UW year. It doesn't add any value to divide premiums and claims to the year then the risk was accepted. For non-life undertakings new business does not have higher risk than old business. The template is constructed for life undertakings.</p> <p>It is difficult to separate claims, expenses and technical provisions between risks accepted during the period and risks accepted prior to the period. When we do calculations we use accident year and not underwriting year.</p> <p>Calculation of Technical Provisions provide a choice of either accident year or underwriting year basis. The QRT should be consistent to this.</p> <p>The combination of risk accepted and LoB for expenses will have to be based on assumptions that can not be checked and reconciled. What value would such reporting give for supervisory purposes?</p> <p>It would be good if EIOPA could prepare a formula document to show into what parts the variance $TP_N - TP_{N-1}$ is analyzed because there are several ways to analyse it. The text in General is not detailed enough. From the document it would be easier to conclude what the calculations</p>	

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assumed really are. Now their specifications are quite obscure. Eg.

Take account of the effect of unwinding discount rate (see cell A2)
- Based on this adjusted figure (BE at closing N-1 + A2) , run the calculation with the change of discount rates that applied during year N

or

Step d/ based on figure (c) i.e., after the unwinding of discount rate and after changes in discount rates, simulate the changes in assumptions that applied during year N (if any) → this will provide the variation of BE related to changes in assumptions (cell BB5=A3(economic assumptions) + B3 (non economic assumptions)

Step e/ consider total BE at the closing of year end N (source BS-C1 and = cell BB8 in VA C2C) and **derive the variation of BE due to experience on risks accepted prior to period (cell BB6=E4) as follows: ...**

don't give guideline how really to calculate. What is the adjusted figure of BE and what is the policy data?

The most usual variance analysis for the risks accepted prior to period is

$$TP_N - TP_{N-1} = [TP_N - TP_N(\text{old estimates and assumptions})] + [TP_N(\text{old estimates and assumptions}) - TP_N(\text{expected at N-1})] + [TP_N(\text{expected at N-1}) - TP_{N-1}] =$$

$$= [TP_N - TP_N(\text{old estimates and assumptions})] + [TP_N(\text{old estimates and assumptions}) - TP_N(\text{expected at N-1})] + [unwinding + netCF_N(\text{expected at N-1})] =$$

$$= \text{changes due to estimate and assumption changes calculated at N with the actual portfolio} + \text{changes due to variance in year N calculated at N with old assumptions and estimates and the actual portfolio} +$$

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netCF_N(actual)+ unwinding

Here netCF the cash flows during year N.

TP_N(expected at N-1) is easily calculated from the expected cash flows from which the cash flows of year N is excluded. Those cash flows have been calculated a year before.

The separation to estimate and assumption changes doesn't seem to be generally accepted. Should the separation to be financial and other non-operational and operational changes? See for more arguments the comments to cell BB1.

If there is non-proportional reinsurance the recoverables are burdensome to allocate for the risks accepted during and prior period. It would be better to treat ceded insurance and reinsurance separately?

There should be Article reference (to L1 and L2) whose requirements the template satisfies.

Risks accepted:

In P&C business the claim liability is allocated according to accident year and the re-allocation to the year accepted is not preferable. In other reports the claim liability is reported according to the accident year and it would be preferable that the reporting occurs every in the same way. It is relevant when the event has occurred not when it has been accepted. The main question if the reserving is correct. In the life business more relevant is the correctness of the future premiums.

In life business this easier but there are problems if the allocation requires that the contracts where there has been additional selling should be calculated in two times, before the additional selling (which is unneeded elsewhere and makes the calculation too complex) and after. The solution shall be to report only totally new risks accepted.

Distinction between "risk accepted during / prior to reporting period" i.e. underwriting year (UWY) is difficult to produce and the information is not currently available for claims in several lines of business. Thus, approximations should be used. However, accident year (AY) based information

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	exists, as the technical provisions are calculated as the AY basis. It should be allowed to use AY in stead of UWY. Clarification of signs of figures should be made. For example Claims and benefits seems to have "+" sign and BE cash flows "-"-sign. This is somewhat contradictory.	
VA – C2C – Purpose	The LOG should be changed to clarify EIOPA’s intention with this template i.e. it should read "change in best estimate of cashflow" and not "best estimate of cashflow". See the previous comment.	
VA – C2C – Benefits		
VA – C2C - Costs	Expenses paid is not available in accounting now and hence system changes are needed. Premiums paid is not available from the systems now, only premiums written. Changes in systems will cause costs.	
VA – C2C – Groups		
VA - C2C – Materiality		
VA - C2C – Disclosure		
VA – C2C – Frequency		
VA C2C -cell AA5		
VA C2C -cell A1		
VA C2C -cell B1		
VA C2C -cell C1	Salvage and subrogation can not be separated. Include this in claims and benefits paid instead.	
VA C2C -cell D1		
VA C2C -cell E1	Sign "-“ should be clarified, or if the sign is "+" then formula in F1 is wrong?!	
VA C2C -cell E1A	Sign "-“ should be clarified, or if the sign is "+" then formula in F1 is wrong?!	
VA C2C -cell G1	Should be change in reinsurance and SPV recoverables as the actual payments could but doesn’t have to effect own funds.	

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	In the case of the non-proportional reinsurance the recoverables are burdensome to allocate for the risks accepted during period.	
VA C2C -cell H1	In the case of the non-proportional reinsurance the recoverables are burdensome to allocate for the risks accepted during period.	
VA C2C -cell E1A		
VA C2C -cell A2	What does mean discount rates that applied during year N? It changes all the time. What is calculation of the unwinding of discount rates ? Is it run of one year N? Isn't the approximation TP at the year end * yield of 1 y at the year end of N-1 sufficient? It is used regularly in the embedded value calculations.	
VA C2C -cell B2		
VA C2C -cell D2	Based on this adjusted figure (BE at closing N-1 + A2) , run the calculation with the change of discount rates that applied during year N → this will provide the variation of BE strictly related to changes of discount rate is not a clear guideline. What does mean run the calculation. What is adjusted figure (BE at closing N-1 + A2)? Portfolio at year end N-1 where BE is the old BE + A2 or what? This seems to be applied to the old expected portfolio and therefore the effect of change is made to the situation where the current discount rate didn't exist. Because the experience analysis should first performed this change of estimate should be performed by using the portfolio at year end N excluding the new business using the discount rate at year end N-1 and N (which is the BE). See comment in General.	
VA C2C -cell E2	See the previous comment.	
VA C2C -cell G2	See the previous comment.	
VA C2C -cell A3	In order to isolate this strict scope of variation, the calculation should be the following: - Consider total BE at the closing of the period N-1 (i.e., based on former assumptions...) – this figure should be equal to that in TP E1/F1 at year end N-1. - Based on this figure, preliminary take account of the effect of unwinding discount rate and changes in discount rate (see cells A2 and D2)	

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	- then, based on this adjusted figure, run calculations of the changes in economic assumptions that applied during year N (if any) → this will provide the variation of BE strictly related to changes in economic assumptions is not a clear guideline. What does mean run the calculation. Portfolio? This calculation should be done using the actual portfolio at year end N using the current discount and first old economic assumptions and secondly new ones.	
VA C2C -cell B3	See the previous comment.	
VA C2C -cell C3	See the previous comment.	
VA C2C -cell A4		
VA C2C -cell B4		
VA C2C -cell C4	Salvage and subrogation can not be separated. Include this in claims and benefits paid instead.	
VA C2C -cell D4	Expenses paid is not available in accounting now and hence system changes are needed.	
VA C2C -cell E4		
VA C2C -cell E4A		
VA C2C -cell G4	Please refer to VA – C2C – cell G1 for comments on reinsurance recoverables.	
VA C2C -cell H4		
VA C2C -cell BB1	See the comments in General. This is not very clear guideline. The order of the calculation doesn't seem to be correct or optimal. If the experience variance is calculated after the changes of the assumptions and estimates then the changes of the assumptions and estimates are based on the portfolio at year end N-1 even though those changes hadn't been done then but at year end N. It is not consistent. It would be	

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be difficult to construct the portfolio at the end year N which would have been expected at year end N-1 but the cash flows from year N on exist and they need no adjustment. Therefore, the opposite calculation order in the comments in General is recommended. Steps c and d and therefore partly e don't identify which portfolio is used.

The opposite order is followed mainly by the embedded value calculations. In IFRS 4 Phase II it has not been decided yet how the variance analysis is done but the discussion go to that opposite direction. In order that the companies can use the same clear and good practice and definitions everywhere in their reporting we support the opposite order.

Please, see for the discussion in IFRS 4 Phase II the staff papers 4D p.29 in <http://www.ifrs.org/Meetings/IASB+FASB+Meeting+October+2011.htm> and paper 3A p.2-3 in <http://www.ifrs.org/Meetings/IASB+Meeting+June+2011.htm>.

where the order is

- (i) building block approach underwriting margin (being the experience variance)
- (ii) experience adjustment related to the current period
- (iii) changes in assumptions

For the embedded value calculation, please, see Annex A on p. 27 in http://www.cfoforum.nl/downloads/MCEV_Principles_and_Guidance_October_2009.pdf where the order of the relevant items is

Opening *MCEV*
 New business value
 Expected existing business contribution (*referencerate*) (1) (2) This is experience variance
 Expected existing business contribution (in excess of *reference rate*) (1) (3) This is experience variance
 Experience variances
 Assumption changes
 Economic variances
 Closing *MCEV*

The guideline p.35 paragraph 179 states that the above order is the one which is recommended

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	<p>even though exceptions are allowed. http://www.cfoforum.nl/downloads/CFO Forum MCEV Basis for Conclusions.pdf</p> <p>The definition shall be replaced by</p> <p>Steps a and b as expressed. Step c /the cash flows during year N Step d/ Calculate from the cash flows generated the year before with the assumptions then the TP at N. Step e/ Calculate with the actual policy data at N with the assumptions the year earlier (as in d) the TP at N. Step f/ Calculate with the actual policy data at N with the actual assumptions the TP at N.</p>	
VA C2C -cell CC1		
VA - C2D- General		
VA - C2D - Purpose		
VA - C2D - Benefits		
VA - C2D - Costs		
VA - C2D - Groups		
VA - C2D - Materiality		
VA - C2D - Disclosure		
VA - C2D - Frequency		
VA C2D -cell O2		
VA C2D -cell O3		
VA C2D -cell O4		
VA C2D -cell O6		
VA C2D -cell O7		
VA C2D -cell O8		
VA C2D -cell O9		

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VA C2D -cell O10		
VA C2D -cell O11		
VA C2D -cell O12		
SCR - B2A - General	Should the title be only for Standard Formula?	
SCR - B2A - Purpose		
SCR - B2A - Benefits		
SCR - B2A - Costs		
SCR - B2A - Groups		
SCR - B2A - Materiality		
SCR - B2A - Disclosure		
SCR - B2A - Frequency		
SCR - B2A - cell A1	This is a general comment on the colouring chart provided in the templates. The chart suggests that cyan fields are calculated with a formula, and green fields are calculated as total sum. Is this a calculation functionality provided by EIOPA similarly to QIS5, or something else? There are inconsistencies within what is now marked as calculated, compare e.g. SCR-B3C where diversification effect and total capital requirement are shown as calculated, and SCR-B3D where similar fields are not shown as calculated.	
SCR - B2A - cell B1		
SCR - B2A - cell A2		
SCR - B2A - cell B2		
SCR - B2A - cell A3		
SCR - B2A - cell B3		
SCR - B2A - cell A4		
SCR - B2A - cell B4		

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SCR - B2A - cell A5		
SCR - B2A - cell B5=A5		
SCR - B2A - cell A6	In a setup where undertaking is using PIM to calculate capital requirement for e.g. parts of market risks, is the diversification between SF modules still relevant? Or should the total diversification stemming from PIM and SF calculated parts be shown on A9, where the aggregation rules leading to diversification effect between SF calculated parts and PIM parts has been agreed with the supervisor.	
SCR - B2A - cell B6	In a setup where undertaking is using PIM to calculate capital requirement for e.g. parts of market risks, is the diversification between SF modules still relevant? Or should the total diversification stemming from PIM and SF calculated parts be shown on A9, where the aggregation rules leading to diversification effect between SF calculated parts and PIM parts has been agreed with the supervisor.	
SCR - B2A - cell A7		
SCR - B2A - cell B7=A7		
SCR - B2A - cell A8		
SCR - B2A - cell B8	In a setup where undertaking is using PIM to calculate capital requirement for e.g. parts of market risks, is the diversification between SF modules still relevant? Or should the total diversification stemming from PIM and SF calculated parts be shown on A9, where the aggregation rules leading to diversification effect between SF calculated parts and PIM parts has been agreed with the supervisor.	
SCR - B2A - cell A9	In a setup where undertaking is using PIM to calculate capital requirement for e.g. parts of market risks, is the diversification between SF modules still relevant? Or should the total diversification stemming from PIM and SF calculated parts be shown on A9, where the aggregation rules leading to diversification effect between SF calculated parts and PIM parts has been agreed with the supervisor.	
SCR - B2A - cell B9		
SCR - B2A - cell A11	The log and the template both have different formulae, both inconsistent with the L2 (Oct 2011) text. Shouldn't it be $-\max(\min(B10-A10;FDB);0)$?	
SCR - B2A - cell A12		

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SCR - B2A - cell A13		
SCR - B2A - cell A14		
SCR - B2A - cell A14A		
SCR - B2A - cell A15A		
SCR - B2A - cell A15B		
SCR - B2A - cell A15C		
SCR - B2A - cell A16		
SCR - B2A - cell A17		
SCR - B2A - cell A18		
SCR - B2A - cell A19		
SCR - B2A - cell A20		
SCR - B2A - cell A21		
SCR - B2B - General		
SCR - B2B - Purpose		
SCR - B2B - Benefits		
SCR - B2B - Costs		
SCR - B2B - Groups		
SCR - B2B - Materiality		
SCR - B2B - Disclosure		
SCR - B2B - Frequency		
SCR - B2B- cell A1.1		
SCR - B2B- cell A1A.1		
SCR - B2B- cell B1.1		
SCR - B2B- cell A1.n		
SCR - B2B- cell A1A.n		

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SCR - B2B- cell B1.n		
SCR - B2B- cell B3		
SCR - B2B- cell B5		
SCR - B2B- cell B6		
SCR - B2B- cell B8		
SCR - B2C - General		
SCR - B2C - Purpose		
SCR - B2C - Benefits		
SCR - B2C - Costs		
SCR - B2C - Groups		
SCR - B2C - Materiality		
SCR - B2C- Disclosure		
SCR - B2C - Frequency		
SCR - B2C- cell A1.1		
SCR - B2C- cell A1A.1		
SCR - B2C- cell B1.1		
SCR - B2C- cell A1.n		
SCR - B2C- cell A1A.n		
SCR - B2C- cell B1.n		
SCR - B2C- cell B3		
SCR - B2C- cell B5		
SCR - B2C- cell B6		
SCR - B2C- cell B7		
SCR - B2C- cell B7A		
SCR - B2C- cell B8A		

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SCR - B2C- cell B8B		
SCR - B2C- cell B8C		
SCR - B2C- cell B9		
SCR - B2C- cell B10		
SCR - B2C- cell B11		
SCR - B2C- cell B13		
SCR - B2C- cell B14		
SCR - B2C- cell B15		
SCR - B3A - General		
SCR - B3A - Purpose		
SCR - B3A - Benefits		
SCR - B3A - Costs		
SCR - B3A - Groups		
SCR - B3A - Materiality		
SCR - B3A - Disclosure		
SCR - B3A - Frequency		
SCR - B3A- cell C0		
SCR - B3A- cell D0		
SCR - B3A- cell A1		
SCR - B3A- cell A1A		
SCR - B3A- cell B1		
SCR - B3A- cell B1A		
SCR - B3A- cell C1		
SCR - B3A- cell B1B		
SCR - B3A- cell D1		

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SCR - B3A- cell A2	If this is known to have smaller NAV change it should be possible to leave this uncompleted.	
SCR - B3A- cell A2A		
SCR - B3A- cell B2	If this is known to have smaller NAV change it should be possible to leave this uncompleted.	
SCR - B3A- cell B2A	If this is known to have smaller NAV change it should be possible to leave this uncompleted.	
SCR - B3A- cell C2	If this is known to have smaller NAV change it should be possible to leave this uncompleted.	
SCR - B3A- cell B2B	If this is known to have smaller NAV change it should be possible to leave this uncompleted.	
SCR - B3A- cell D2	If this is known to have smaller NAV change it should be possible to leave this uncompleted.	
SCR - B3A- cell C3	In the definition the correlation is missing. Should be $SCR_{equity} = \sqrt{SCR_{type1equities}^2 + 2 \cdot 0.75 \cdot SCR_{type1equities} \cdot SCR_{type2equities} + SCR_{type2equities}^2}$	
SCR - B3A- cell D3	In the definition the correlation is missing. Should be $SCR_{equity} = \sqrt{SCR_{type1equities}^2 + 2 \cdot 0.75 \cdot SCR_{type1equities} \cdot SCR_{type2equities} + SCR_{type2equities}^2}$	
SCR - B3A- cell A4		
SCR - B3A- cell A4A		
SCR - B3A- cell B4		
SCR - B3A- cell B4A		
SCR - B3A- cell C4		
SCR - B3A- cell B4B		
SCR - B3A- cell D4		
SCR - B3A- cell A5		
SCR - B3A- cell B5		
SCR - B3A- cell A6		
SCR - B3A- cell B6		
SCR - B3A- cell A7		
SCR - B3A- cell B7		
SCR - B3A- cell A8		

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SCR - B3A- cell A8A		
SCR - B3A- cell B8		
SCR - B3A- cell B8A		
SCR - B3A- cell B8B		
SCR - B3A- cell D8		
SCR - B3A- cell A9		
SCR - B3A- cell B9		
SCR - B3A- cell A10		
SCR - B3A- cell B10		
SCR - B3A- cell A11		
SCR - B3A- cell B11		
SCR - B3A- cell A12		
SCR - B3A- cell A12A		
SCR - B3A- cell B12		
SCR - B3A- cell B12A		
SCR - B3A- cell C12		
SCR - B3A- cell B12B		
SCR - B3A- cell D12		
SCR - B3A- cell C13		
SCR - B3A- cell D13		
SCR - B3A- cell A14		
SCR - B3A- cell A14A		
SCR - B3A- cell B14		
SCR - B3A- cell B14A		
SCR - B3A- cell C14		
SCR - B3A- cell B14B		

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SCR - B3A- cell D14		
SCR - B3A- cell C15		
SCR - B3A- cell D15		
SCR - B3A- cell A16		
SCR - B3A- cell A16A		
SCR - B3A- cell B16		
SCR - B3A- cell B16A		
SCR - B3A- cell C16		
SCR - B3A- cell B16B		
SCR - B3A- cell D16		
SCR - B3A- cell A17	If this is known to have smaller NAV change it should be possible to leave this uncompleted.	
SCR - B3A- cell A17A	If this is known to have smaller NAV change it should be possible to leave this uncompleted.	
SCR - B3A- cell B17	If this is known to have smaller NAV change it should be possible to leave this uncompleted.	
SCR - B3A- cell B17A	If this is known to have smaller NAV change it should be possible to leave this uncompleted.	
SCR - B3A- cell C17	If this is known to have smaller NAV change it should be possible to leave this uncompleted.	
SCR - B3A- cell B17B	If this is known to have smaller NAV change it should be possible to leave this uncompleted.	
SCR - B3A- cell D17	If this is known to have smaller NAV change it should be possible to leave this uncompleted.	
SCR - B3A- cell A18		
SCR - B3A- cell A18A		
SCR - B3A- cell B18		
SCR - B3A- cell B18A		
SCR - B3A- cell C18		
SCR - B3A- cell B18B		
SCR - B3A- cell D18		
SCR - B3A- cell A19		
SCR - B3A- cell A19A		

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SCR - B3A- cell C19		
SCR - B3A- cell D19		
SCR - B3A- cell A20		
SCR - B3A- cell A20A		
SCR - B3A- cell C20		
SCR - B3A- cell D20		
SCR - B3A- cell A21		
SCR - B3A- cell A21A		
SCR - B3A- cell B21		
SCR - B3A- cell B21A		
SCR - B3A- cell C21		
SCR - B3A- cell B21B		
SCR - B3A- cell D21		
SCR - B3A- cell C22		
SCR - B3A- cell D22		
SCR - B3A- cell C23		
SCR - B3A- cell D23		
SCR - B3B – General		
SCR - B3B – Purpose		
SCR - B3B – Benefits		
SCR - B3B – Costs		
SCR - B3B – Groups		
SCR - B3B – Materiality		
SCR - B3B - Disclosure		
SCR - B3B – Frequency		

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SCR - B3B- cell A0		
SCR - B3B- cell B0		
SCR - B3B- cell A1		
SCR - B3B- cell A1A		
SCR - B3B- cell A2		
SCR - B3B- cell A3		
SCR - B3B- cell A4		
SCR - B3B- cell B6		
SCR - B3B- cell A7		
SCR - B3B- cell A8		
SCR - B3B- cell A9		
SCR - B3B- cell B9		
SCR - B3C - General		
SCR - B3C - Purpose		
SCR - B3C - Benefits		
SCR - B3C - Costs		
SCR - B3C - Groups		
SCR - B3C - Materiality		
SCR - B3C - Disclosure		
SCR - B3C - Frequency		
SCR - B3C- cell A1		
SCR - B3C- cell A1A		
SCR - B3C- cell B1		
SCR - B3C- cell B1A		
SCR - B3C- cell C1		

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SCR - B3C- cell B1B		
SCR - B3C- cell D1		
SCR - B3C- cell A2		
SCR - B3C- cell A2A		
SCR - B3C- cell B2		
SCR - B3C- cell B2A		
SCR - B3C- cell C2		
SCR - B3C- cell B2B		
SCR - B3C- cell D2		
SCR - B3C- cell A3		
SCR - B3C- cell A3A		
SCR - B3C- cell B3		
SCR - B3C- cell B3A		
SCR - B3C- cell C3		
SCR - B3C- cell B3B		
SCR - B3C- cell D3		
SCR - B3C- cell C04	If it is evident which scenario gives the highest stress it should be possible to leave the other two scenarios uncompleted.	
SCR - B3C- cell D04	If it is evident which scenario gives the highest stress it should be possible to leave the other two scenarios uncompleted.	
SCR - B3C- cell A4		
SCR - B3C- cell A4A		
SCR - B3C- cell B4		
SCR - B3C- cell B4A		
SCR - B3C- cell C4		
SCR - B3C- cell B4B		
SCR - B3C- cell D4		

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SCR - B3C- cell A5		
SCR - B3C- cell A5A		
SCR - B3C- cell B5		
SCR - B3C- cell B5A		
SCR - B3C- cell C5		
SCR - B3C- cell B5B		
SCR - B3C- cell D5		
SCR - B3C- cell A6		
SCR - B3C- cell A6A		
SCR - B3C- cell B6		
SCR - B3C- cell B6A		
SCR - B3C- cell C6		
SCR - B3C- cell B6B		
SCR - B3C- cell D6		
SCR - B3C- cell A7		
SCR - B3C- cell A7A		
SCR - B3C- cell B7		
SCR - B3C- cell B7A		
SCR - B3C- cell C7	In the guidelines there is the printing error telling this cell is <u>C7</u>	
SCR - B3C- cell B7B		
SCR - B3C- cell D7		
SCR - B3C- cell A8		
SCR - B3C- cell A8A		
SCR - B3C- cell B8		
SCR - B3C- cell B8A		
SCR - B3C- cell C8		

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SCR - B3C- cell B8B		
SCR - B3C- cell D8		
SCR - B3C- cell A9		
SCR - B3C- cell A9A		
SCR - B3C- cell B9		
SCR - B3C- cell B9A		
SCR - B3C- cell C9		
SCR - B3C- cell B9B		
SCR - B3C- cell D9		
SCR - B3C- cell C10		
SCR - B3C- cell D10		
SCR - B3C- cell C11		
SCR - B3C- cell D11		
SCR - B3C- cell A12	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3D - General		
SCR - B3D - Purpose		
SCR - B3D - Benefits		
SCR - B3D - Costs		
SCR - B3D - Groups		
SCR - B3D - Materiality		
SCR - B3D - Disclosure		
SCR - B3D - Frequency		
SCR - B3D- cell A12		

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SCR - B3D- cell A12A		
SCR - B3D- cell B12		
SCR - B3D- cell C12		
SCR - B3D- cell D12		
SCR - B3D- cell E12		
SCR - B3D- cell F12		
SCR - B3D- cell A13		
SCR - B3D- cell A13A		
SCR - B3D- cell B13		
SCR - B3D- cell C13		
SCR - B3D- cell D13		
SCR - B3D- cell E13		
SCR - B3D- cell F13		
SCR - B3D- cell A14		
SCR - B3D- cell A14A		
SCR - B3D- cell B14		
SCR - B3D- cell C14		
SCR - B3D- cell D14		
SCR - B3D- cell E14		
SCR - B3D- cell F14		
SCR - B3D- cell A15		
SCR - B3D- cell A15A		
SCR - B3D- cell B15		
SCR - B3D- cell C15		
SCR - B3D- cell D15		
SCR - B3D- cell E15		

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SCR - B3D- cell F15		
SCR - B3D- cell A16		
SCR - B3D- cell A17		
SCR - B3D- cell A18		
SCR - B3D- cell A18A		
SCR - B3D- cell B18		
SCR - B3D- cell B18A		
SCR - B3D- cell C18		
SCR - B3D- cell A19		
SCR - B3D- cell A20		
SCR - B3D- cell A21	This is calculated also in B3F –why could not be taken from there ?	
SCR - B3D- cell A22	See A21	
SCR - B3D- cell A23	See A21	
SCR - B3D- cell A24		
SCR - B3D- cell A25		
SCR - B3D- cell A26		
SCR - B3D- cell A27		
SCR - B3E – General		
SCR - B3E – Purpose		
SCR - B3E – Benefits		
SCR - B3E – Costs		
SCR - B3E – Groups		
SCR - B3E – Materiality		
SCR - B3E - Disclosure		

Comments Template on Draft proposal for Quantitative Reporting Templates		Deadline 20 January 2012 12:00 CET
SCR - B3E - Frequency		
SCR - B3E- cell A1	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell A1A		
SCR - B3E- cell B1	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell C1		
SCR - B3E- cell D1		
SCR - B3E- cell E1		
SCR - B3E- cell F1		
SCR - B3E- cell A2	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell A2A		
SCR - B3E- cell B2	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell C2		
SCR - B3E- cell D2		
SCR - B3E- cell E2		
SCR - B3E- cell F2		
SCR - B3E- cell A3	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell A3A		
SCR - B3E- cell B3	The log document states that this needs to be filled only if the factor use is truly undertaking	

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	specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell C3		
SCR - B3E- cell D3		
SCR - B3E- cell E3		
SCR - B3E- cell F3		
SCR - B3E- cell A4	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell A4A		
SCR - B3E- cell B4	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell C4		
SCR - B3E- cell D4		
SCR - B3E- cell E4		
SCR - B3E- cell F4		
SCR - B3E- cell A5	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell A5A		
SCR - B3E- cell B5	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell C5		
SCR - B3E- cell D5		
SCR - B3E- cell E5		
SCR - B3E- cell F5		

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SCR - B3E- cell A6	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell A6A		
SCR - B3E- cell B6	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell C6		
SCR - B3E- cell D6		
SCR - B3E- cell E6		
SCR - B3E- cell F6		
SCR - B3E- cell A7	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell A7A		
SCR - B3E- cell B7	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell C7		
SCR - B3E- cell D7		
SCR - B3E- cell E7		
SCR - B3E- cell F7		
SCR - B3E- cell A8	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell A8A		
SCR - B3E- cell B8	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	

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SCR - B3E- cell C8		
SCR - B3E- cell D8		
SCR - B3E- cell E8		
SCR - B3E- cell F8		
SCR - B3E- cell A9	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell A9A		
SCR - B3E- cell B9	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell C9		
SCR - B3E- cell D9		
SCR - B3E- cell E9		
SCR - B3E- cell F9		
SCR - B3E- cell A10	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell A10A		
SCR - B3E- cell B10	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell C10		
SCR - B3E- cell D10		
SCR - B3E- cell E10		
SCR - B3E- cell F10		
SCR - B3E- cell A11	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill	

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	the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell A11A		
SCR - B3E- cell B11	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell C11		
SCR - B3E- cell D11		
SCR - B3E- cell E11		
SCR - B3E- cell F11		
SCR - B3E- cell A12	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell A12A		
SCR - B3E- cell B12	The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text.	
SCR - B3E- cell C12		
SCR - B3E- cell D12		
SCR - B3E- cell E12		
SCR - B3E- cell F12		
SCR - B3E- cell A13		
SCR - B3E- cell A14		
SCR - B3E- cell A15		
SCR - B3E- cell A15A		
SCR - B3E- cell B15		
SCR - B3E- cell B15A		
SCR - B3E- cell C15		

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SCR - B3E- cell A16	Why this is not taken from B3F ?	
SCR - B3E- cell A17		
SCR - B3E- cell A18		
SCR - B3F - General		
SCR - B3F - Purpose		
SCR - B3F - Benefits		
SCR - B3F - Costs		
SCR - B3F - Groups		
SCR - B3F - Materiality		
SCR - B3F - Disclosure		
SCR - B3F - Frequency		
SCR - B3F- cell Summary A1		
SCR - B3F- cell Summary C1		
SCR - B3F- cell Summary A9		
SCR - B3F- cell Summary C9		
SCR - B3F- cell Summary A17		
SCR - B3F- cell Summary C17		
SCR - B3F- cell Summary A26		
SCR - B3F- cell Summary C26		
SCR - B3F- cell Summary		

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A27		
SCR - B3F- cell Summary C27		
SCR - B3F- cell Windstorm A1	The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country (ies)? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20?	
SCR - B3F- cell Windstorm B1		
SCR - B3F- cell Windstorm C1		
SCR - B3F- cell Windstorm E1		
SCR - B3F- cell Windstorm F1		
SCR - B3F- cell Windstorm G1		
SCR - B3F- cell Windstorm H1		
SCR - B3F- cell Windstorm A2	The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country (ies)? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20?	
SCR - B3F- cell Windstorm B2		
SCR - B3F- cell Windstorm C2		
SCR - B3F- cell Windstorm E2		
SCR - B3F- cell Windstorm		

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F2		
SCR - B3F- cell Windstorm G2		
SCR - B3F- cell Windstorm H2		
SCR - B3F- cell Windstorm A3	The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country (ies)? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20?	
SCR - B3F- cell Windstorm B3		
SCR - B3F- cell Windstorm C3		
SCR - B3F- cell Windstorm E3		
SCR - B3F- cell Windstorm F3		
SCR - B3F- cell Windstorm G3		
SCR - B3F- cell Windstorm H3		
SCR - B3F- cell Windstorm A20	The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country (ies)? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20?	
SCR - B3F- cell Windstorm B20		
SCR - B3F- cell Windstorm C20		
SCR - B3F- cell Windstorm		

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E20		
SCR - B3F- cell Windstorm F20		
SCR - B3F- cell Windstorm G20		
SCR - B3F- cell Windstorm H20		
SCR - B3F- cell Windstorm A22		
SCR - B3F- cell Windstorm F22		
SCR - B3F- cell Windstorm G22		
SCR - B3F- cell Windstorm H22		
SCR - B3F- cell Windstorm I22		
SCR - B3F- cell Windstorm F25		
SCR - B3F- cell Windstorm I25		
SCR - B3F- cell Earthquake A1	The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20.	
SCR - B3F- cell Earthquake B1		
SCR - B3F- cell Earthquake C1		
SCR - B3F- cell Earthquake E1		

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SCR - B3F- cell Earthquake F1		
SCR - B3F- cell Earthquake G1		
SCR - B3F- cell Earthquake A2	The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20.	
SCR - B3F- cell Earthquake B2		
SCR - B3F- cell Earthquake C2		
SCR - B3F- cell Earthquake E2		
SCR - B3F- cell Earthquake F2		
SCR - B3F- cell Earthquake G2		
SCR - B3F- cell Earthquake A3	The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20.	
SCR - B3F- cell Earthquake B3		
SCR - B3F- cell Earthquake C3		
SCR - B3F- cell Earthquake E3		
SCR - B3F- cell Earthquake F3		

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SCR - B3F- cell Earthquake G3		
SCR - B3F- cell Earthquake A20	The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20.	
SCR - B3F- cell Earthquake B20		
SCR - B3F- cell Earthquake C20		
SCR - B3F- cell Earthquake E20		
SCR - B3F- cell Earthquake F20		
SCR - B3F- cell Earthquake G20		
SCR - B3F- cell Earthquake A22		
SCR - B3F- cell Earthquake E22		
SCR - B3F- cell Earthquake F22		
SCR - B3F- cell Earthquake G22		
SCR - B3F- cell Earthquake H22		
SCR - B3F- cell Earthquake E25		
SCR - B3F- cell Earthquake H25		
SCR - B3F- cell Flood A1	The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that	

Comments Template on Draft proposal for Quantitative Reporting Templates		Deadline 20 January 2012 12:00 CET
	relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20.	
SCR - B3F- cell Flood B1		
SCR - B3F- cell Flood C1		
SCR - B3F- cell Flood E1		
SCR - B3F- cell Flood F1		
SCR - B3F- cell Flood G1		
SCR - B3F- cell Flood H1		
SCR - B3F- cell Flood A2	The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20.	
SCR - B3F- cell Flood B2		
SCR - B3F- cell Flood C2		
SCR - B3F- cell Flood E2		
SCR - B3F- cell Flood F2		
SCR - B3F- cell Flood G2		
SCR - B3F- cell Flood H2		
SCR - B3F- cell Flood A3	The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20.	
SCR - B3F- cell Flood B3		
SCR - B3F- cell Flood C3		

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SCR - B3F- cell Flood E3		
SCR - B3F- cell Flood F3		
SCR - B3F- cell Flood G3		
SCR - B3F- cell Flood H3		
SCR - B3F- cell Flood A20	The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20.	
SCR - B3F- cell Flood B20		
SCR - B3F- cell Flood C20		
SCR - B3F- cell Flood E20		
SCR - B3F- cell Flood F20		
SCR - B3F- cell Flood G20		
SCR - B3F- cell Flood H20		
SCR - B3F- cell Flood A22		
SCR - B3F- cell Flood F22		
SCR - B3F- cell Flood G22		
SCR - B3F- cell Flood H22		
SCR - B3F- cell Flood I22		
SCR - B3F- cell Flood F25		
SCR - B3F- cell Flood I25		
	The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20.	
SCR - B3F- cell Hail A1		
SCR - B3F- cell Hail B1		

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SCR - B3F- cell Hail C1		
SCR - B3F- cell Hail E1		
SCR - B3F- cell Hail F1		
SCR - B3F- cell Hail G1		
SCR - B3F- cell Hail H1		
SCR - B3F- cell Hail A2	The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20.	
SCR - B3F- cell Hail B2		
SCR - B3F- cell Hail C2		
SCR - B3F- cell Hail E2		
SCR - B3F- cell Hail F2		
SCR - B3F- cell Hail G2		
SCR - B3F- cell Hail H2		
SCR - B3F- cell Hail A3	The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20.	
SCR - B3F- cell Hail B3		
SCR - B3F- cell Hail C3		
SCR - B3F- cell Hail E3		
SCR - B3F- cell Hail F3		
SCR - B3F- cell Hail G3		
SCR - B3F- cell Hail H3		
SCR - B3F- cell Hail A20	The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that	

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	relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20.	
SCR - B3F- cell Hail B20		
SCR - B3F- cell Hail C20		
SCR - B3F- cell Hail E20		
SCR - B3F- cell Hail F20		
SCR - B3F- cell Hail G20		
SCR - B3F- cell Hail H20		
SCR - B3F- cell Hail A22		
SCR - B3F- cell Hail F22		
SCR - B3F- cell Hail G22		
SCR - B3F- cell Hail H22		
SCR - B3F- cell Hail I22		
SCR - B3F- cell Hail F25		
SCR - B3F- cell Hail I25		
SCR - B3F- cell Subsidence A1		
SCR - B3F- cell Subsidence B1		
SCR - B3F- cell Subsidence C1		
SCR - B3F- cell Subsidence F1		
SCR - B3F- cell Subsidence G1		
SCR - B3F- cell Subsidence H1		

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SCR - B3F- cell Subsidence E3		
SCR - B3F- cell Subsidence H3		
SCR - B3F- cell Non-proportional property reinsurance A1		
SCR - B3F- cell Non-proportional property reinsurance B1		
SCR - B3F- cell Non-proportional property reinsurance C1		
SCR - B3F- cell Non-proportional property reinsurance D1		
SCR - B3F- cell Motor Vehicle Liability A1		
SCR - B3F- cell Motor Vehicle Liability A2		
SCR - B3F- cell Motor Vehicle Liability A3		
SCR - B3F- cell Motor Vehicle Liability A4		
SCR - B3F- cell Motor Vehicle Liability A5		
SCR - B3F- cell Marine Tanker Collision A1	The header stating – Maximum marine hull – should be rephrased into Marine Hull or equivalent, since the SF calculation in L2 (Oct 2011) text is based on a given tanker having the maximum sum of the three (Marine Hull + Marine Liability + Marine Oil Pollution Liability), not the maximum of the components of the sum.	
SCR - B3F- cell Marine Tanker Collision B1	The header stating – Maximum marine hull – should be rephrased into Marine Hull or equivalent, since the SF calculation in L2 (Oct 2011) text is based on a given tanker having the maximum sum	

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	of the three (Marine Hull + Marine Liability + Marine Oil Pollution Liability), not the maximum of the components of the sum.	
SCR - B3F- cell Marine Tanker Collision C1	The header stating – Maximum marine hull – should be rephrased into Marine Hull or equivalent, since the SF calculation in L2 (Oct 2011) text is based on a given tanker having the maximum sum of the three (Marine Hull + Marine Liability + Marine Oil Pollution Liability), not the maximum of the components of the sum.	
SCR - B3F- cell Marine Tanker Collision A2		
SCR - B3F- cell Marine Tanker Collision B2		
SCR - B3F- cell Marine Tanker Collision C2		
SCR - B3F- cell Marine Tanker Collision A3		
SCR - B3F- cell Marine Tanker Collision B3		
SCR - B3F- cell Marine Tanker Collision C3		
SCR - B3F- cell Marine Platform Explosion A5		
SCR - B3F- cell Marine Platform Explosion B5		
SCR - B3F- cell Marine Platform Explosion C5		
SCR - B3F- cell Marine Platform Explosion D5		
SCR - B3F- cell Marine Platform Explosion E5		
SCR - B3F- cell Marine Platform Explosion A6		
SCR - B3F- cell Marine Platform Explosion B6		

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SCR - B3F- cell Marine Platform Explosion C6		
SCR - B3F- cell Marine Platform Explosion D6		
SCR - B3F- cell Marine Platform Explosion E6		
SCR - B3F- cell Marine Platform Explosion A7		
SCR - B3F- cell Marine Platform Explosion B7		
SCR - B3F- cell Marine Platform Explosion C7		
SCR - B3F- cell Marine Platform Explosion D7		
SCR - B3F- cell Marine Platform Explosion E7		
SCR - B3F- cell Marine C9		
SCR - B3F- cell Marine C11		
SCR - B3F- cell Aviation A1		
SCR - B3F- cell Aviation B1		
SCR - B3F- cell Aviation A2	What should undertaking put here in case of an unlimited cover ?	
SCR - B3F- cell Aviation B2		
SCR - B3F- cell Aviation A3		
SCR - B3F- cell Aviation B3		
SCR - B3F- cell Fire A1		
SCR - B3F- cell Fire A2		
SCR - B3F- cell Fire A3		
SCR - B3F- cell Liability A1		
SCR - B3F- cell Liability B1		
SCR - B3F- cell Liability C1		

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SCR - B3F- cell Liability D1		
SCR - B3F- cell Liability E1		
SCR - B3F- cell Liability A2		
SCR - B3F- cell Liability B2		
SCR - B3F- cell Liability C2		
SCR - B3F- cell Liability D2		
SCR - B3F- cell Liability E2		
SCR - B3F- cell Liability A3		
SCR - B3F- cell Liability B3		
SCR - B3F- cell Liability C3		
SCR - B3F- cell Liability D3		
SCR - B3F- cell Liability E3		
SCR - B3F- cell Liability A4	The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums.	
SCR - B3F- cell Liability B4	The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums.	
SCR - B3F- cell Liability C4	The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums.	
SCR - B3F- cell Liability D4	The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums.	
SCR - B3F- cell Liability E4	The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums.	
SCR - B3F- cell Liability A1		

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SCR - B3F- cell Liability A5		
SCR - B3F- cell Liability B5		
SCR - B3F- cell Liability C5		
SCR - B3F- cell Liability D5		
SCR - B3F- cell Liability E5		
SCR - B3F- cell Liability A6		
SCR - B3F- cell Liability B6		
SCR - B3F- cell Liability C6		
SCR - B3F- cell Liability D6		
SCR - B3F- cell Liability E6		
SCR - B3F- cell Liability A8	The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums.	
SCR - B3F- cell Liability B8	The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums.	
SCR - B3F- cell Liability C8	The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums.	
SCR - B3F- cell Liability D8	The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums.	
SCR - B3F- cell Liability E8	The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums.	
SCR - B3F- cell Liability A9		
SCR - B3F- cell Liability B9		
SCR - B3F- cell Liability C9		

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SCR - B3F- cell Liability D9		
SCR - B3F- cell Liability E9		
SCR - B3F- cell Liability A10		
SCR - B3F- cell Liability B10		
SCR - B3F- cell Liability C10		
SCR - B3F- cell Liability D10		
SCR - B3F- cell Liability E10		
SCR - B3F- cell Liability A12	The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums.	
SCR - B3F- cell Liability B12	The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums.	
SCR - B3F- cell Liability C12	The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums.	
SCR - B3F- cell Liability D12	The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums.	
SCR - B3F- cell Liability E12	The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums.	
SCR - B3F- cell Liability H12		
SCR - B3F- cell Liability A14		
SCR - B3F- cell Liability B14		
SCR - B3F- cell Liability C14		
SCR - B3F- cell Liability		

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D14		
SCR - B3F- cell Liability E14		
SCR - B3F- cell Liability H14		
SCR - B3F- cell Credit & Suretyship Large Credit Default A1		
SCR - B3F- cell Credit & Suretyship Large Credit Default B1		
SCR - B3F- cell Credit & Suretyship Large Credit Default A2		
SCR - B3F- cell Credit & Suretyship Large Credit Default B2		
SCR - B3F- cell Credit & Suretyship Large Credit Default A4		
SCR - B3F- cell Credit & Suretyship Large Credit Default B4		
SCR - B3F- cell Credit & Suretyship Large Credit Default A5		
SCR - B3F- cell Credit & Suretyship Large Credit Default B5		
SCR - B3F- cell Credit & Suretyship Recession Risk A7		
SCR - B3F- cell Credit & Suretyship Recession Risk		

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A8		
SCR - B3F- cell Credit & Suretyship Recession Risk A9		
SCR - B3F- cell Credit & Suretyship Recession Risk A10		
SCR - B3F- cell Credit & Suretyship C12		
SCR - B3F- cell Credit & Suretyship C14		
SCR - B3F- cell Other non-life catastrophe risk A1		
SCR - B3F- cell Other non-life catastrophe risk B1		
SCR - B3F- cell Other non-life catastrophe risk C1		
SCR - B3F- cell Other non-life catastrophe risk D1		
SCR - B3F- cell Other non-life catastrophe risk E1		
SCR - B3F- cell Other non-life catastrophe risk A2		
SCR - B3F- cell Other non-life catastrophe risk B2		
SCR - B3F- cell Other non-life catastrophe risk C2		
SCR - B3F- cell Other non-life catastrophe risk D2		
SCR - B3F- cell Other non-life catastrophe risk E2		
SCR - B3F- cell Other non-life catastrophe risk H2		

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SCR - B3F- cell Other non-life catastrophe risk A4		
SCR - B3F- cell Other non-life catastrophe risk B4		
SCR - B3F- cell Other non-life catastrophe risk C4		
SCR - B3F- cell Other non-life catastrophe risk D4		
SCR - B3F- cell Other non-life catastrophe risk E4		
SCR - B3F- cell Other non-life catastrophe risk H4		
SCR - B3F- cell Mass Accident A1		
SCR - B3F- cell Mass Accident B1		
SCR - B3F- cell Mass Accident C1		
SCR - B3F- cell Mass Accident D1		
SCR - B3F- cell Mass Accident E1		
SCR - B3F- cell Mass Accident F1		
SCR - B3F- cell Mass Accident G1		
SCR - B3F- cell Mass Accident H1		
SCR - B3F- cell Mass Accident I1		
SCR - B3F- cell Mass Accident J1		
SCR - B3F- cell Mass		

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Accident K1		
SCR - B3F- cell Mass Accident L1		
SCR - B3F- cell Mass Accident M1		
SCR - B3F- cell Mass Accident A2		
SCR - B3F- cell Mass Accident B2		
SCR - B3F- cell Mass Accident C2		
SCR - B3F- cell Mass Accident D2		
SCR - B3F- cell Mass Accident E2		
SCR - B3F- cell Mass Accident F2		
SCR - B3F- cell Mass Accident G2		
SCR - B3F- cell Mass Accident H2		
SCR - B3F- cell Mass Accident I2		
SCR - B3F- cell Mass Accident J2		
SCR - B3F- cell Mass Accident K2		
SCR - B3F- cell Mass Accident L2		
SCR - B3F- cell Mass Accident M2		
SCR - B3F- cell Mass Accident A3		

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SCR - B3F- cell Mass Accident B3		
SCR - B3F- cell Mass Accident C3		
SCR - B3F- cell Mass Accident D3		
SCR - B3F- cell Mass Accident E3		
SCR - B3F- cell Mass Accident F3		
SCR - B3F- cell Mass Accident G3		
SCR - B3F- cell Mass Accident H3		
SCR - B3F- cell Mass Accident I3		
SCR - B3F- cell Mass Accident J3		
SCR - B3F- cell Mass Accident K3		
SCR - B3F- cell Mass Accident L3		
SCR - B3F- cell Mass Accident M3		
SCR - B3F- cell Mass Accident A20		
SCR - B3F- cell Mass Accident B20		
SCR - B3F- cell Mass Accident C20		
SCR - B3F- cell Mass Accident D20		
SCR - B3F- cell Mass		

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Accident E20		
SCR - B3F- cell Mass Accident F20		
SCR - B3F- cell Mass Accident G20		
SCR - B3F- cell Mass Accident H20		
SCR - B3F- cell Mass Accident I20		
SCR - B3F- cell Mass Accident J20		
SCR - B3F- cell Mass Accident K20		
SCR - B3F- cell Mass Accident L20		
SCR - B3F- cell Mass Accident M20		
SCR - B3F- cell Mass Accident K22		
SCR - B3F- cell Mass Accident N22		
SCR - B3F- cell Concentration Accident A1		
SCR - B3F- cell Concentration Accident B1		
SCR - B3F- cell Concentration Accident C1		
SCR - B3F- cell Concentration Accident D1		
SCR - B3F- cell Concentration Accident E1		
SCR - B3F- cell Concentration Accident F1		

Comments Template on Draft proposal for Quantitative Reporting Templates		Deadline 20 January 2012 12:00 CET
SCR - B3F- cell Concentration Accident G1		
SCR - B3F- cell Concentration Accident H1		
SCR - B3F- cell Concentration Accident I1		
SCR - B3F- cell Concentration Accident A2		
SCR - B3F- cell Concentration Accident B2		
SCR - B3F- cell Concentration Accident C2		
SCR - B3F- cell Concentration Accident D2		
SCR - B3F- cell Concentration Accident E2		
SCR - B3F- cell Concentration Accident F2		
SCR - B3F- cell Concentration Accident G2		
SCR - B3F- cell Concentration Accident H2		
SCR - B3F- cell Concentration Accident I2		
SCR - B3F- cell Concentration Accident A3		
SCR - B3F- cell Concentration Accident B3		
SCR - B3F- cell Concentration Accident C3		
SCR - B3F- cell Concentration Accident D3		
SCR - B3F- cell		

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Concentration Accident E3		
SCR - B3F- cell Concentration Accident F3		
SCR - B3F- cell Concentration Accident G3		
SCR - B3F- cell Concentration Accident H3		
SCR - B3F- cell Concentration Accident I3		
SCR - B3F- cell Concentration Accident A20		
SCR - B3F- cell Concentration Accident B20		
SCR - B3F- cell Concentration Accident C20		
SCR - B3F- cell Concentration Accident D20		
SCR - B3F- cell Concentration Accident E20		
SCR - B3F- cell Concentration Accident F20		
SCR - B3F- cell Concentration Accident G20		
SCR - B3F- cell Concentration Accident H20		
SCR - B3F- cell Concentration Accident I20		
SCR - B3F- cell Concentration Accident G22		
SCR - B3F- cell Concentration Accident J22		
SCR - B3F- cell Pandemic A1		

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SCR - B3F- cell Pandemic B1		
SCR - B3F- cell Pandemic C1		
SCR - B3F- cell Pandemic D1		
SCR - B3F- cell Pandemic E1		
SCR - B3F- cell Pandemic F1		
SCR - B3F- cell Pandemic A2		
SCR - B3F- cell Pandemic B2		
SCR - B3F- cell Pandemic C2		
SCR - B3F- cell Pandemic D2		
SCR - B3F- cell Pandemic E2		
SCR - B3F- cell Pandemic F2		
SCR - B3F- cell Pandemic A3		
SCR - B3F- cell Pandemic B3		
SCR - B3F- cell Pandemic C3		
SCR - B3F- cell Pandemic D3		
SCR - B3F- cell Pandemic E3		
SCR - B3F- cell Pandemic		

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F2		
SCR - B3F- cell Pandemic A20		
SCR - B3F- cell Pandemic B20		
SCR - B3F- cell Pandemic C20		
SCR - B3F- cell Pandemic D20		
SCR - B3F- cell Pandemic E20		
SCR - B3F- cell Pandemic F20		
SCR - B3F- cell Pandemic F21		
SCR - B3F- cell Pandemic D22		
SCR - B3F- cell Pandemic G22		
SCR - B3G - General		
SCR - B3G - Purpose		
SCR - B3G - Benefits		
SCR - B3G - Costs		
SCR - B3G - Groups		
SCR - B3G - Materiality		
SCR - B3G - Disclosure		
SCR - B3G - Frequency		
SCR - B3G- cell A1	Can this be already found from some other template ?	

Comments Template on Draft proposal for Quantitative Reporting Templates		Deadline 20 January 2012 12:00 CET
SCR - B3G- cell A2	See A1	
SCR - B3G- cell A3	See A1.	
SCR - B3G- cell A4		
	<p>The definition of the earned premium is incorrect. It claims that the whole written premium should be earned over the term of the policy. In the life insurance there often is, however, the deposit component which won't be earned. Wikipedia recognises the definition</p> <p style="text-align: center;">A.1. <i>Earned Premium</i></p> <p>Earned premium is the portion of an insurance written premium which is considered "earned" by the insurer, based on the part of the policy period that the insurance has been in effect, and during which the insurer has been exposed to loss. ... Earned premium will not be returned to the insured if the policy is cancelled.</p> <p>Why this information cannot be taken from the template Cover A1A, both templates will be filled in yearly basis?</p>	
SCR - B3G- cell A5		
SCR - B3G- cell A6	See the comment in cell A5.	
SCR - B3G- cell A7	See the comment in cell A5.	
SCR - B3G- cell A8	See the comment in cell A5.	
SCR - B3G- cell A9	See the comment in cell A5.	
SCR - B3G- cell A10	See the comment in cell A5.	
SCR - B3G- cell A11		
SCR - B3G- cell A12		
SCR - B3G- cell A13	It should be made clearer in the text of the template that only 30 % of the net Basic Solvency Capital requirement should be entered, not the full extent.	
SCR - B3G- cell A14		
SCR - B3G- cell A15	Is this the reporting requirement already ?	
SCR - B3G- cell A16		

Comments Template on Draft proposal for Quantitative Reporting Templates		Deadline 20 January 2012 12:00 CET
MCR - B4A & B4B – General	It is currently unclear where annuities related to non-life contracts should be reported. B22?	
MCR - B4A & B4B – Purpose		
MCR - B4A & B4B – Benefits		
MCR - B4A & B4B – Costs		
MCR - B4A & B4B – Groups		
MCR - B4A & B4B – Materiality		
MCR - B4A & B4B – Disclosure		
MCR - B4A & B4B – Frequency		
MCR - B4A- cell A1		
MCR - B4A- cell B2		
MCR - B4A- cell C2		
MCR - B4A- cell B3		
MCR - B4A- cell C3		
MCR - B4A- cell B4		
MCR - B4A- cell C4		
MCR - B4A- cell B5		
MCR - B4A- cell C5		
MCR - B4A- cell B6		
MCR - B4A- cell C6		
MCR - B4A- cell B7		
MCR - B4A- cell C7		
MCR - B4A- cell B8		

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MCR - B4A- cell C8		
MCR - B4A- cell B9		
MCR - B4A- cell C9		
MCR - B4A- cell B10		
MCR - B4A- cell C10		
MCR - B4A- cell B11		
MCR - B4A- cell C11		
MCR - B4A- cell B12		
MCR - B4A- cell C12		
MCR - B4A- cell B13		
MCR - B4A- cell C13		
MCR - B4A- cell B14		
MCR - B4A- cell C14		
MCR - B4A- cell B15		
MCR - B4A- cell C15		
MCR - B4A- cell B16		
MCR - B4A- cell C16		
MCR - B4A- cell B17		
MCR - B4A- cell C17		
MCR - B4A- cell A18		
MCR - B4A- cell B19		
MCR - B4A- cell B20		
MCR - B4A- cell B21		
MCR - B4A- cell B22		
MCR - B4A- cell C23		
MCR - B4A- cell A24		

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MCR - B4A- cell A25		
MCR - B4A- cell A26		
MCR - B4A- cell A27		
MCR - B4A- cell A28		
MCR - B4A- cell A29		
MCR - B4A- cell A30		
MCR - B4A- cell A31		
MCR - B4B- cell B1		
MCR - B4B- cell C1		
MCR - B4B- cell D2		
MCR - B4B- cell E2		
MCR - B4B- cell F2		
MCR - B4B- cell G2		
MCR - B4B- cell D3		
MCR - B4B- cell E3		
MCR - B4B- cell F3		
MCR - B4B- cell G3		
MCR - B4B- cell D4		
MCR - B4B- cell E4		
MCR - B4B- cell F4		
MCR - B4B- cell G4		
MCR - B4B- cell D5		
MCR - B4B- cell E5		
MCR - B4B- cell F5		
MCR - B4B- cell G5		
MCR - B4B- cell D6		

Comments Template on Draft proposal for Quantitative Reporting Templates		Deadline 20 January 2012 12:00 CET
MCR - B4B- cell E6		
MCR - B4B- cell F6		
MCR - B4B- cell G6		
MCR - B4B- cell D7		
MCR - B4B- cell E7		
MCR - B4B- cell F7		
MCR - B4B- cell G7		
MCR - B4B- cell D8		
MCR - B4B- cell E8		
MCR - B4B- cell F8		
MCR - B4B- cell G8		
MCR - B4B- cell D9		
MCR - B4B- cell E9		
MCR - B4B- cell F9		
MCR - B4B- cell G9		
MCR - B4B- cell D10		
MCR - B4B- cell E10		
MCR - B4B- cell F10		
MCR - B4B- cell G10		
MCR - B4B- cell D11		
MCR - B4B- cell E11		
MCR - B4B- cell F11		
MCR - B4B- cell G11		
MCR - B4B- cell D12		
MCR - B4B- cell E12		
MCR - B4B- cell F12		

Comments Template on Draft proposal for Quantitative Reporting Templates		Deadline 20 January 2012 12:00 CET
MCR - B4B- cell G12		
MCR - B4B- cell D13		
MCR - B4B- cell E13		
MCR - B4B- cell F13		
MCR - B4B- cell G13		
MCR - B4B- cell D14		
MCR - B4B- cell E14		
MCR - B4B- cell F14		
MCR - B4B- cell G14		
MCR - B4B- cell D15		
MCR - B4B- cell E15		
MCR - B4B- cell F15		
MCR - B4B- cell G15		
MCR - B4B- cell D16		
MCR - B4B- cell E16		
MCR - B4B- cell F16		
MCR - B4B- cell G16		
MCR - B4B- cell D17		
MCR - B4B- cell E17		
MCR - B4B- cell F17		
MCR - B4B- cell G17		
MCR - B4B- cell B18		
MCR - B4B- cell C18		
MCR - B4B- cell D19		
MCR - B4B- cell F19		
MCR - B4B- cell D20		

Comments Template on Draft proposal for Quantitative Reporting Templates		Deadline 20 January 2012 12:00 CET
MCR - B4B- cell F20		
MCR - B4B- cell D21		
MCR - B4B- cell F21		
MCR - B4B- cell D22		
MCR - B4B- cell F22		
MCR - B4B- cell E23		
MCR - B4B- cell G23		
MCR - B4B- cell A24		
MCR - B4B- cell A25		
MCR - B4B- cell A26		
MCR - B4B- cell A27		
MCR - B4B- cell A28		
MCR - B4B- cell A29		
MCR - B4B- cell A30		
MCR - B4B- cell A31		
MCR - B4B- cell B32		
MCR - B4B- cell C32		
MCR - B4B- cell B33		
MCR - B4B- cell C33		
MCR - B4B- cell B34		
MCR - B4B- cell C34		
MCR - B4B- cell B35		
MCR - B4B- cell C35		
MCR - B4B- cell B36		
MCR - B4B- cell C36		
MCR - B4B- cell B37		

Comments Template on Draft proposal for Quantitative Reporting Templates		Deadline 20 January 2012 12:00 CET
MCR - B4B- cell C37		
MCR - B4B- cell B38		
MCR - B4B- cell C38		
MCR - B4B- cell B39		
MCR - B4B- cell C39		
Assets - D1- General	<p>A mapping exercise will be required in order to match data types to the codes in the CIC table. The definitions of data elements may vary across the EU so it will be necessary to ensure that matching to CIC codes is carried out in a consistent way.</p> <p>Could it be enough to report the ISIN-code only because it already includes lots of information like issuer sector, issuer group code etc. .</p> <p>Proportionality and materiality should be taken into account in reporting these issues.</p> <p>Do we need to report unit-linked products here at so detailed level? ? It might be better to have an own template for unit linked assets with less information.</p>	
Assets - D1- Purpose		
Assets - D1- Benefits		
Assets - D1- Costs		
Assets - D1- Groups		
Assets - D1- Materiality		
Assets - D1- Disclosure		
Assets - D1- Frequency		
Assets - D1 - Quarterly Exemption		

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Assets - D1- cell A1		
Assets - D1- cell A2		
Assets - D1- cell A3		
Assets - D1- cell A4		
Assets - D1- cell A5		
Assets - D1- cell A6		
Assets - D1- cell A7		
Assets - D1- cell A8		
Assets - D1- cell A9	<p>NACE codes are not readily available from current data sources for example, Bloomberg. An exercise will be required to map issuers to NACE codes. There is a risk of differences between the ways in which different entities complete this mapping. This could be avoided if supervisors centrally created a mapping of issuers to NACE codes rather than requesting this information via the QRTs.</p> <p>Other code systems are currently used across Europe, such as ICB and GICS, this makes the necessity for a mapping system even more essential.</p> <p>There is a question as to whether a licence fee should be paid in order to use NACE codes, in such cases, undertakings would be required to pay for the use of multiple coding systems.</p>	
Assets - D1- cell A10	<p>This information must be sourced from an external provider and will be difficult to report unless the fund/issuer has provided their ultimate parent company information. This is not always the case.</p> <p>Group structures are frequently subject to change and to update this information will be time consuming.</p> <p>If ISIN codes have been used in cell A5 of this template, then the information will be easily identifiable. Please refer to D1- cell A4 for CEA comments on the use of ISIN codes.</p>	

Comments Template on Draft proposal for Quantitative Reporting Templates		Deadline 20 January 2012 12:00 CET
Assets - D1- cell A11	The large CIC classification matrix is difficult to maintain with a high accuracy, i.e. it increases the operational risk - still ambiguous, e.g. companies might classify differently, e.g. should 'Government Guaranteed belong to Government, Other or Corporate, Other	
Assets - D1- cell A12		
Assets - D1- cell A13		
Assets - D1- cell A15	<p>Any new asset classification system will involve tremendous administrative costs at first, such codes would have to be entered manually for the current book of business.</p> <p>Supervisory guidance is necessary to ensure all undertakings apply the codes in the same way, for example it could be the case that the same security is assigned a different CIC by different groups and undertakings. It could be the case that different undertakings use other CIC codes for the same investment instruments. It would be helpful if the CIC code is issued together with the ISIN codes or other codes used as a result of reporting requirements. It would be useful to complete a mapping exercise as outlined in D1- cell A9.</p> <p>As it currently stands, the CIC does not seem to adequately distinguish between different types of risk categories, primarily with bonds. Financials and Corporates as well as Covered Bonds are all put into one asset group (Bonds- Corporate bonds), subordinated bonds are not addressed as a single category. Additional categories would be helpful, such as private equities. Furthermore, we suggest merging commodities funds with alternative funds.</p> <p>There is a need for a strong and stable reference frame, more precise definitions should be provided for each category, especially concerning Investment Funds. Clarification is also required as to what code would be used when the security is unlisted.</p> <p>We question the relevance of applying this to unit linked related securities from the perspective of risk exposure monitoring, considering that the investment risk is not supported by the undertaking.</p>	

**Comments Template on
Draft proposal for Quantitative Reporting Templates**

**Deadline
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	<p>The information about the place where the security is listed combined with CIC code is too complex.</p> <p>Is these information really needed ? Does not ISIN-code be sufficient ? This will require changes in systems. And this is not risk-based, as solvency II should be.</p>	
Assets - D1- cell A16		
Assets - D1- cell A17		
Assets - D1- cell A18		
Assets - D1- cell A19		
Assets - D1- cell A20		
Assets - D1- cell A22		
Assets - D1- cell A23		
Assets - D1- cell A24		
Assets - D1- cell A25		
Assets - D1- cell A26		
Assets - D1- cell A28		
Assets - D1- cell A30		
Assets - D1Q- General		
Assets - D1Q- Purpose		
Assets - D1Q- Benefits		
Assets - D1Q- Costs		
Assets - D1Q- Groups		
Assets - D1Q- Materiality		
Assets - D1Q- Disclosure		

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Assets - D1Q- Frequency		
Assets - D1Q- cell A1 (list)		
Assets - D1Q- cell A2 (list)		
Assets - D1Q- cell A3 (list)		
Assets - D1Q- cell A4 (list)		
Assets - D1Q- cell A5 (list)		
Assets - D1Q- cell A6 (list)		
Assets - D1Q- cell A7 (list)		
Assets - D1Q- cell A8 (list)		
Assets - D1Q- cell A9 (list)		
Assets - D1Q- cell A10 (list)		
Assets - D1Q- cell A12 (list)		
Assets - D1Q- cell A13 (list)		
Assets - D1Q- cell A14 (list)		
Assets - D1Q- cell A15 (list)		
Assets - D1Q- cell A16 (list)		
Assets - D1Q- cell A17 (list)		
Assets - D1Q- cell A18 (list)		
Assets - D1Q- cell A20 (list)		
Assets - D1Q- cell A22 (list)		
Assets - D1Q- cell A24 (list)		
Assets - D1Q- cell A25 (list)		
Assets - D1Q- cell A28 (list)		
Assets - D1Q- cell A30 (list)		
Assets - D1Q- cell A3		
Assets - D1Q- cell A5		

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Assets - D1Q- cell A6		
Assets - D1Q- cell A7		
Assets - D1Q- cell A7A		
Assets - D1Q- cell A8		
Assets - D1Q- cell A8A		
Assets - D1Q- cell A8C		
Assets - D1Q- cell A8D		
Assets - D1Q- cell A9A		
Assets - D1Q- cell A9B		
Assets - D1Q- cell A9C		
Assets - D1Q- cell A9D		
Assets - D1Q- cell A9E		
Assets - D1Q- cell A9F		
Assets - D1Q- cell A10A		
Assets - D1Q- cell A10B		
Assets - D1Q- cell A14		
Assets - D1Q- cell A11		
Assets - D1Q- cell A12		
Assets - D1Q- cell A13		
Assets - D1Q- cell A27		
Assets - D1Q- cell L16		
Assets - D1S- General		
Assets - D1S- Purpose		
Assets - D1S- Benefits		
Assets - D1S- Costs		

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Assets - D1S- Groups		
Assets - D1S- Materiality		
Assets - D1S- Disclosure		
Assets - D1S- Frequency		
Assets - D1S- cell A1		
Assets - D1S- cell A2		
Assets - D1S- cell A3		
Assets - D1S- cell A4		
Assets - D1S- cell A5		
Assets - D1S- cell A6		
Assets - D1S- cell A7		
Assets - D1S- cell A8		
Assets - D1S- cell A9		
Assets - D1S- cell A10		
Assets - D1S- cell A12		
Assets - D1S- cell A13		
Assets - D1S- cell A14		
Assets - D1S- cell A15		
Assets – D20- General	Underlying assets in derivatives are not possible to derive in the report, e.g. there are 4 legs in an Fx-swap but only two fields to report. Is there a reason for this?	
Assets – D20- Purpose		
Assets – D20- Benefits		
Assets – D20- Costs		
Assets – D20- Groups		
Assets – D20- Materiality		

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Assets – D20- Disclosure		
Assets – D20- Frequency		
Assets – D20 – Quarterly Exemption		
Assets - D20- cell A1		
Assets - D20- cell A2		
Assets - D20- cell A3		
Assets - D20- cell A4		
Assets - D20- cell A5		
Assets - D20- cell A6		
Assets - D20- cell A7		
Assets - D20- cell A8		
Assets - D20- cell A9		
Assets - D20- cell A10		
Assets - D20- cell A11		
Assets - D20- cell A13	Derivatives can be used also in hedging of the liabilities e.g. the technical provisions.	
Assets - D20- cell A14		
Assets - D20- cell A15		
Assets - D20- cell A16		
Assets - D20- cell A17		
Assets - D20- cell A19		
Assets - D20- cell A20		
Assets - D20- cell A21		
Assets - D20- cell A22		
Assets - D20- cell A23		
Assets - D20- cell A24		

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Assets - D20- cell A25		
Assets - D20- cell A26		
Assets - D20- cell A27		
Assets - D20- cell A28		
Assets - D20- cell A29		
Assets - D20- cell A31		
Assets - D20- cell A32		
Assets - D20- cell A33		
Assets - D20- cell A34		
Assets - D20- cell A35		
Assets - D2T- General	<p>To meet the purpose we do only see a need for active derivative positions to be able to have an understanding about the risk in the portfolio.</p> <p>Transaction doesn't add any value if the receiver doesn't have a portfolio system where this could be monitored (i.e. supervisor).</p>	
Assets - D2T- Purpose		
Assets - D2T- Benefits		
Assets - D2T- Costs		
Assets - D2T- Groups		
Assets - D2T- Materiality		
Assets - D2T- Disclosure		
Assets - D2T- Frequency		
Assets - D2T- Quarterly Exemption		
Assets - D2T- cell A1		
Assets - D2T- cell A2		

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Assets - D2T- cell A3		
Assets - D2T- cell A4		
Assets - D2T- cell A5		
Assets - D2T- cell A6		
Assets - D2T- cell A7		
Assets - D2T- cell A8		
Assets - D2T- cell A9		
Assets - D2T- cell A10		
Assets - D2T- cell A11		
Assets - D2T- cell A13	See comment in D2O – A13	
Assets - D2T- cell A14		
Assets - D2T- cell A15		
Assets - D2T- cell A16		
Assets - D2T- cell A17		
Assets - D2T- cell A18		
Assets - D2T- cell A19		
Assets - D2T- cell A20		
Assets - D2T- cell A21		
Assets - D2T- cell A22		
Assets - D2T- cell A23		
Assets - D2T- cell A24		
Assets - D2T- cell A25		
Assets - D2T- cell A26		
Assets - D2T- cell A27		
Assets - D2T- cell A28		
Assets - D2T- cell A30		

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Assets - D2T- cell A31		
Assets - D2T- cell A32		
Assets - D2T- cell A34		
Assets - D2T- cell A35		
Assets – D3- General	<p>This information is already reported in the annual report on a level more suitable for the industry. Double reporting should be avoided.</p> <p>Further clarification required: How different types of derivatives should be handled on this template.</p>	
Assets – D3- Purpose	Investment systems calculate performance in original currencies. A conversion to reporting currencies where consideration is taken to currency hedges requires massive system changes.	
Assets – D3- Benefits		
Assets – D3- Costs		
Assets – D3- Groups		
Assets – D3- Materiality		
Assets – D3- Disclosure		
Assets – D3- Frequency		
Assets - D3- cell A1		
Assets - D3- cell A3		
Assets - D3- cell A4		
Assets - D3- cell A6		
Assets - D3- cell A7	In the LOG stands: "Also applicable to derivatives generating interest flows" Where to report all other derivatives? Where the negative cash flows should be reported. See the comment in Template VA C2B – A1	
Assets - D3- cell A8		
Assets - D3- cell A15	Mark to market result would be more adequate to use from a supervisory perspective.	

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	Should the variation margin of derivatives, which are received or paid on a daily basis although they are not sold or closed, report here. See the comment in the Template VA C2B – A7.	
Assets – D4- General	<p>To receive information from Investment Funds will be a challenge, especially on a quarterly basis and from Private Equity and Hedge Funds. There will be a lot of manual work involved with large risk of human errors. Timing issue will also be challenging especially for quarterly reporting. Furthermore, will the information received be sufficient? What about funds that has underlying exposure to other currencies? This will most likely not be captured within present structure.</p> <p>The requirement to report information on funds on a look through principle is extremely difficult and costly. Especially if this requirement is applicable also for the unit linked funds. Equality between fund owners! Information should be given not only to the insurance companies.</p>	
Assets – D4- Purpose		
Assets – D4- Benefits		
Assets – D4- Costs	The requirement to report information on funds on a look through principle is extremely difficult and costly.	
Assets – D4- Groups		
Assets – D4- Materiality	See CEA’s comment on this.	
Assets – D4- Disclosure		
Assets – D4- Frequency	Privat equity funds – quarterly impossible.	
Assets – D4 – Quarterly Exemption		
Assets - D4- cell A1		
Assets - D4- cell A2		
Assets - D4- cell A3		
Assets - D4- cell A4	Underlying asset category will be impossible to retrieve for some private equity funds.	
Assets - D4- cell A5		

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Assets - D4- cell A6	Column specifying the currency not only local /foreign .	
Assets - D4- cell A7		
Assets - D4- cell A8		
Assets – D5- General		
Assets – D5- Purpose		
Assets – D5- Benefits		
Assets – D5- Costs		
Assets – D5- Groups		
Assets – D5- Materiality		
Assets – D5- Disclosure		
Assets – D5- Frequency		
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		

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Assets - D5- cell A14		
Assets – D6- General	The use of cash is not properly addressed in this template.	
Assets – D6- Purpose		
Assets – D6- Benefits		
Assets – D6- Costs		
Assets – D6- Groups		
Assets – D6- Materiality		
Assets – D6- Disclosure		
Assets – D6- Frequency		
Assets - D6- cell A2		
Assets - D6- cell A3		
Assets - D6- cell A4		
Assets - D6- cell A5		
Assets - D6- cell A6		
Assets - D6- cell A7		
Assets - D6- cell A8		
Assets - D6- cell A9		
Assets - D6- cell A10		
Assets - D6- cell A12		
Assets - D6- cell A19		
Assets - D6- cell A20		
Assets - D6- cell A21		
Assets - D6- cell A22		
Assets - D6- cell A24		
Assets - D6- cell A25		

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Assets - D6- cell A26		
Assets - D6- cell A27		
Assets - D6- cell A28		
TP - F1 & F1Q- General	The sign notation has not been properly specified in the templates. It would be easier e.g. for checking purposes to specify + into the undertaking and - from the undertaking.	
TP - F1 & F1Q - Purpose		
TP - F1 & F1Q - Benefits		
TP - F1 & F1Q - Costs		
TP - F1 & F1Q - Groups		
TP - F1 & F1Q - Materiality		
TP - F1 & F1Q - Disclosure		
TP - F1 & F1Q - Frequency		
TP - F1- cells A1 – A14		
TP - F1- cell A7A		
TP - F1- cell A7B		
TP - F1- cell A7C		
TP - F1- cells B1 – B14		
TP - F1- cells B2 – C2		
TP - F1- cells B4-C1		
TP - F1- cells BA1 – BA13		
TP - F1- cell BB1		
TP - F1- cell BB10		
TP - F1- cell BB13		

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TP - F1- cells BC1 – BC13	<p>Because of the definition of line BD this line has overlapping with line BD cash flows: with the additional resulting cash flows from the future premiums, expenses of the policies which would lapse without future premiums, difference of the expenses of active and paid-up policies, commissions.</p> <p>We question the usefulness of split in lines BC-BF and propose the requirements would be deleted. Wouldn't the future cash flows in template TP – F2 give even better information.</p> <p>Do the outward reinsurance premiums belong to here?</p>	
TP - F1- cells BD1 – BD13	<p>Including the additional resulting cash flows from the future premiums this line seem to be EPIFP without the restrictions to positive HRG's.</p> <p>As mentioned in comments to line BC and BF this line has overlap with them. If the overlap is removed and only the future premiums are reported then this kind of information leaves it open the real impact of the future premiums.</p> <p>We question the usefulness of split in lines BC-BF and propose the requirements would be deleted. Wouldn't the future cash flows in template TP – F2 give even better information.</p>	
TP - F1- cells BF1 – BF13	<p>Because of the definition of line BD this line has overlapping with line BD cash flows: with the additional resulting cash flows from the future premiums, e.g commissions from the unit-linked business.</p> <p>We question the usefulness of split in lines BC-BF and propose the requirements would be deleted. Wouldn't the future cash flows in template TP – F2 give even better information.</p>	
TP - F1- cells CB1 – CB14A	CB9, CB14 should be formulas?	
TP - F1- cells CC1 – CC14	CC9, CC14 should be formulas?	
TP - F1- cells CD1 – CD14A	CD9, CD14 should be formulas?	
TP - F1- cells C1 – C14A		
TP - F1- cells CB9A – C9A		
TP - F1- cells E1 – E13	E10: something wrong in formulas F10 and F11, FB10 and FB11?	
TP - F1- cells FB7A		
TP - F1- cells FB7B		
TP - F1- cells FB7C		

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TP - F1- cells IA1 – IA 13	If TP is compared with the surrender values where the surrender values are reported?	
TP - F1- cells J1 – JL13		
TP - F1- cells M1-M13		
TP - F1- cells N1-N13		
TP - F1- cells O1-O13		
TP - F1- cells P1-P13	What should be reported, paid claims and from which period or the net present value?	
TP - F1- cells Q1-Q13		
TP - F1Q- cells A1-A13		
TP - F1Q- cell A7A		
TP - F1Q- cell A7B		
TP - F1Q- cell A7C		
TP - F1Q- cells B1-B13		
TP - F1Q- cells C1-C14A		
TP - F1Q- cell C11		
TP - F1Q- cell C12		
TP - F1Q- cell C13		
TP - F1Q- cell C14A		
TP - F1Q- cell E1-E13		
TP – F2- General	<p>Normal reserving method in non-life companies estimate total reserve levels. This approach would overhaul that general principle and would require drastic changes to methods currently used.</p> <p>This sheet might be of use for the supervisor if more close supervision is needed, e.g. if a company breaches some limits.</p> <p>The sign notation has not been properly specified in the templates. It would be easier e.g. for checking purposes to specify + into the undertaking and - from the undertaking.</p>	

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TP – F2- Purpose		
TP – F2- Benefits		
TP – F2- Costs	Non-life: So far the actuarial methods have been sufficient for reserve levels and worked very well. Changing to cash flow based approach requires considerable amounts of resources.	
TP – F2- Groups		
TP – F2- Materiality		
TP – F2- Disclosure		
TP – F2- Frequency		
TP – F2- cells A1-A34		
TP – F2- cells C1 – C35	This overlaps with column D.	
TP -F2- cells D1-D35	Including the additional resulting cash flows from the future premiums this line seem to be EPIFP without the restrictions to positive HRG's. This line has overlap with C- and F-columns. If the overlap is removed and only the future premiums are reported then this kind of information leaves it open the real impact of the future premiums.	
TP -F2- cells F1-F35	This overlaps with column D.	
TP -F2- cells AU1 –AU35		
TP -F2- cells CU1 – CU35	This overlaps with column DU.	
TP -F2- cells DU1 – DU35	Including the additional resulting cash flows from the future premiums this line seem to be EPIFP without the restrictions to positive HRG's. This line has overlap with CU- and FU-columns. If the overlap is removed and only the future premiums are reported then this kind of information leaves it open the real impact of the future premiums.	
TP -F2- cells FU1 – FU35	This overlaps with column DU.	
TP -F2- cells I1 –I35		
TP -F2- cells J1 –J35	See above	

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TP -F2- cells K1 –K35	See above	
TP -F2- cells L1 –L35	See above	
TP -F2- cells M1 –M35		
TP -F2- cells N1 –N35	See above	
TP -F2- cells O1 –O35	See above	
TP -F2- cells P1-P35	See above	
TP -F2- cells Q1 –Q35		
TP -F2- cells R1 –R35	See above	
TP -F2- cells S1 –S35	See above	
TP -F2- cells T1 –T35	See above	
TP -F2- cells U1 – U35		
TP -F2- cells CH1 –CH35	See above	
TP -F2- cells DH1 –DH35	See above	
TP -F2- cells FH1 –FH35	See above	
TP -F2- cells V1 –V35		
TP -F2- cells X1 – X35	See above	
TP -F2- cells Y1-Y35	See above	
TP -F2- cells Z1- Z35	See above	
TP -F2- cells GH1 –GH35		
TP – F3- General	The LOG comment specifies that annuities stemming from NL contracts are excluded however the definition for cell A1 states that for non-life annuities, it should be specifies which product it belongs to. This seems to be inconsistent. The template should not include information of non-life annuities.	
TP – F3- Purpose	We think this template shall not be included in the set of templates. Arguments: We very much doubt whether this template is good for the stated purpose. There may be thousands of HRG's (see comment in cell A2B) and much more lines. None will read the template, neither the preparer nor the users. Even though HRG's would be defined	

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	<p>properly there might be several tens of lines which is far too granular. For the preparer this template will not give any more risk awareness because the risks are revealed by other means. We think that it is same for the supervisor, too, which must study more than one company.</p> <p>Neither this template is good to the supervisor for making summaries over the undertakings because each undertaking will define HRG in different ways and thus the templates of different undertakings are not comparable.</p>	
TP – F3- Benefits	<p>See the comment for the purpose.</p> <p>Cost of benefits is not proper. This will require from the preparers lot of programming work. The runs of Pilar I measurements are already very heavy and this will load the runs further. The programming and run times and computer resources are already now the main restrictive factor, for many improvements of the processes. The time and resources used to this template can be used much more resource effectively.</p>	
TP – F3- Costs		
TP – F3- Groups		
TP – F3- Materiality		
TP – F3- Disclosure		
TP – F3- Frequency		
TP - F3- cell A1	LOB is not mentioned in the list of different characters. There are hybrid products where the policyholder can choose the yield to be guaranteed or unit linked.	
TP - F3- cell A2A		
TP - F3- cell A2B	<p>HRG is specified for this cell. However, HRG is not specified L1 standard and L2 draft standard. This is totally wrong place to give such an important definition. HRG are used for many needs in the standards.</p> <p>There is a partial definition of HRG in L2 draft standard in Article 28(2) and 29 but they apply only to life insurance and cases where groupin is made. More seriously, those definitions are in</p>	

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	<p>contradiction with the definition given for this template. L3 standard cannot overcome L2 standard and thus it cannot be contradictory with L2. The definition of HRG must be given in L2 standard. After that it must be checked that all the requirements connected to HRG's workable. (This should be the comment for L2 standard and thus this is wrong place.)</p> <p>Clearer title would be Number of HRG's in Product. The current title makes to understand that HRG's are listed and numbered and the number of that list is reported even though the definition is enough specified but also the title could be more.</p>	
TP - F3- cell A2C	If the definition of L2 is followed the only possible answer is No.	
TP - F3- cell A3		
TP - F3- cell A4		
TP - F3- cell A5		
TP - F3- cell A6		
TP - F3- cell A7	Regular but flexible premium is very important class of premium paying but not included in this list.	
TP - F3- cell A8		
TP - F3- cell A9		
TP - F3- cell A10		
TP - F3- cell A15		
TP - F3- cell A21		
TP - F3- cell A24	Capital at risk is reinsurance dependent (eg. Article 106(2)(a)) and reinsurance may be undertaking specific, not product or contract specific, so that this information may be difficult to issue. Better information would be sum at risk.	
TP - F3- cell A26		
TP - F3- cell A30		
TP - F3- cell A34A	The definition in the LOG is not unambiguous.	

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	<p>This is not calculated by model because it is not used anywhere else. It is not good use of resources to use programming time and resources to this figure which is too granular. Many factors which are used for the HRG classification are not relevant to the thoretical claims and thus unnecessary.</p> <p>There is no cell A20 to which the comparision is done.</p>	
TP - F3- cell A41		
TP – F3A- General		
TP – F3A- Purpose		
TP – F3A- Benefits		
TP – F3A- Costs		
TP – F3A- Groups		
TP – F3A- Materiality		
TP – F3A- Disclosure		
TP – F3A- Frequency		
TP - F3A- cell A1		
TP - F3A- cell A2		
TP - F3A- cell A3		
TP - F3A- cell A4		
TP - F3A- cell A5		
TP - F3A- cell A6		
TP - F3A- cell A7		
TP - F3A- cell A8		
TP - F3A- cell A9		
TP - F3A- cell A10		
TP - F3A- cell A11		

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TP - F3A- cell A12		
TP - F3A- cell A13		
TP - F3A- cell A14		
TP - F3A- cell A15		
TP - F3A- cell A16		
TP - F3B- cell A1		
TP - F3B- cell A2		
TP - F3B- cell A3		
TP - F3B- cell A4		
TP - F3B- cell A5		
TP - F3B- cell A6		
TP - F3B- cell A7		
TP - F3B- cell A8		
TP - F3B- cell A9		
TP - F3B- cell A10		
TP – F4- General	<p>According to LOG the released annuity claims provisions (and annuity IBNR) do not fit to any column A0-A5.</p> <p>There seems to be missing a column for “Undiscounted annuity provisions released during year N”</p> <p>It is understandable, that the relating non-life line of business would give information to where such annuities arise. However, such information may prove out to be difficult as additional field to database should be needed.</p> <p>More details should be assigned to how the number of annuities, average technical rate in year N, the average duration of the obligations and weighted average age of beneficiaries are calculated. Is the age for example the age of beneficiaries at the date of report (for example 31.12.2015), or at the date of accident, or another definition?</p>	

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	It is required to modify existing systems to calculate the annuity claims provisions set up during year N, as the value should correspond to the date of setting up the reserve. At least at the beginning it should be allowed to value such annuities as the end of year N.	
TP – F4- Purpose		
TP – F4- Benefits		
TP – F4- Costs		
TP – F4- Groups		
TP – F4- Materiality		
TP – F4- Disclosure		
TP – F4- Frequency		
TP - F4- cell A0		
TP - F4- cell A1	Where to put undiscounted annuity claims provisions <i>released</i> during year N?	
TP - F4- cell A2		
TP - F4- cell A3		
TP - F4- cell A4		
TP - F4- cell A5		
TP - F4- cell B1		
TP - F4- cell C1		
TP - F4- cell D1		
TP - F4- cell A6		
TP – E1 & E1Q- General		
TP – E1 & E1Q - Purpose		
TP – E1 & E1Q - Benefits		

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**Deadline
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TP – E1 & E1Q - Costs		
TP – E1 & E1Q - Groups		
TP – E1 & E1Q - Materiality		
TP – E1 & E1Q - Disclosure		
TP – E1 & E1Q - Frequency		
TP - E1- cells A1-P1		
TP -E1- cellss A2-L2		
TP -E1- cellss A3-L3		
TP -E1- cellss M4-P4		
TP -E1- cellss A5-P5		
TP -E1- cellss A6-L6		
TP -E1- cellss M7-P7		
TP -E1- cellss A9-P9		
TP -E1- cells A10-P10		
TP -E1- cells A11-P11		
TP -E1- cells A12-P12		
TP -E1- cells A14-L14		
TP -E1- cells A15-L15		
TP -E1- cells M16-P16		
TP -E1- cells A18-P18		
TP -E1- cells A19-P19		
TP -E1- cells A20-P20		
TP -E1- cells A21-P21		
TP -E1- cells A25-P25		
TP -E1- cells A29-P29		

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TP -E1- cells A30-P30		
TP -E1- cells A31-P31		
TP -E1- cells A32-P32		
TP -E1- cells A33-P33		
TP -E1- cells A34-P34	We would need costly changes in the recovery process, pricing and related systems if we must separate the recourse and any recovery cash flows from the cash flows. We do the pricing based on the “net” cash flows (not splitting cash flows to out- and in-flows itself or splitting aforementioned two cash-flows to sub-groups as well).	
TP -E1- cells A35-P35	We would need costly changes in the recovery process, pricing and related systems if we must separate the recourse and any recovery cash flows from the cash flows. We do the pricing based on the “net” cash flows (not splitting cash flows to out- and in-flows itself or splitting aforementioned two cash-flows to sub-groups as well).	
TP -E1- cells A36-P36	We would need costly changes in the recovery process, pricing and related systems if we must separate the recourse and any recovery cash flows from the cash flows. We do the pricing based on the “net” cash flows (not splitting cash flows to out- and in-flows itself or splitting aforementioned two cash-flows to sub-groups as well).	
TP -E1- cellss A37-P37	We would need costly changes in the recovery process, pricing and related systems if we must separate the recourse and any recovery cash flows from the cash flows. We do the pricing based on the “net” cash flows (not splitting cash flows to out- and in-flows itself or splitting aforementioned two cash-flows to sub-groups as well).	
TP -E1- cellss A38-P38	The life template does not include a requirement to report on the use of simplified methods. should be deleted also from the non-life templates!	
TP -E1- cellss A39-P39		
TP -E1- cellss A40-P40		
TP -E1- cellss A41-L53	Localisation of risk will be difficult to split out, in the same way that data on technical provisions are not available by counterparty. We would ask that this requirement be removed (see CEA note). For example marine insurance.	
TP - E1 Q- cells A1-R1		
TP - E1 Q- cells A2-R2		

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TP - E1 Q- cells A3-R3		
TP - E1 Q- cells A5-R5		
TP - E1 Q- cells A6-R6		
TP - E1 Q- cells A10-R10		
TP – E2- General	<p>Normal reserving method in non-life companies estimate total reserve levels. This approach would overhaul that general principle and would require drastic changes to methods currently used.</p> <p>This sheet might be of use for the supervisor if more close supervision is needed, e.g. if a company breaches some limits.</p>	
TP – E2- Purpose		
TP – E2- Benefits		
TP – E2- Costs	<p>So far the actuarial methods have been sufficient for reserve levels and worked very well. Changing to cash flow based approach requires considerable amounts of resources.</p> <p>If in and out cash flows are required separately, it will involve substantial costs for us.</p>	
TP – E2- Groups		
TP – E2- Materiality		
TP – E2- Disclosure		
TP – E2- Frequency		
TP - E2- cells A1-A31		
TP - E2- cells B1-B31		
TP - E2- cells C1-C31		
TP - E2- cells D1-D31		
TP - E2- cells E1-E31		
TP - E2- cells F1-F31		
TP – E3- General	It is unclear if and how annuities should be included in this template. We suggest dropping the	

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salvage and subrogation triangle for paid claims. We suggest to aggregate them with paid claims. There is no additional value from separation (materiality!). For RBNS claims, these are reserved taking salvage etc into account when relevant, but no split of « gross reserve » and « salvage reserve » exists and would have to be done using keys. We do not see any advantages in doing so.

As the purpose should not be for auditing, the template could be for a standard 10 years, and left empty for those years there is not data available, for short tailed lines.

The claim adjustment expenses we do not currently report with the claims payments, and we do not have this information per accident year (or uw year for that matter), i.e. a process and system change would be needed. We could not get the historical data in any way, when doing reporting the first time

We have the “net” triangles of the claim payments, not the split into the 3 first triangles. What would be the specific supervisory purpose of the split?

We use endogenous inflations mainly, which may specific per HRGs. Then you would also need the triangles per HRGs, which we certainly do not recommend. A simple yes/no answer could be sufficient at the top of the page.

The methods used, and tail factor, is also per HRG, or even several methods within one HRG, so it must be thought about the optimal way to gather this information, if at all. We believe it is perhaps too detailed.

Reporting RBNS claims should not be required as RBNS and IBNR are calculated as whole. (See CEA note for more details)

Should be included the cell to show whether AY or UWY is used.

TP – E3- Purpose		
TP – E3- Benefits		
TP – E3- Costs		
TP – E3- Groups		
TP – E3- Materiality		

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TP – E3- Disclosure		
TP – E3- Frequency		
TP - E3- cells A00		
TP - E3- cells A01		
TP - E3- cells A02		
TP - E3- cells A03: N		
TP - E3- cells A04		
TP - E3- cells A1-A15-J0	It should be better defined what to include in J0, J16 and J32. Cumulative or non cumulative amounts of N-15 and prior years? The use of J0 in columns “In current year” and “Sum of years” is contradictory.	
TP - E3- cells A17-A31-J16	We cannot split out salvage and subrogation due to limitations in our base systems.	
TP - E3- cells A33-A47-J32		
TP - E3- cells P1-P15-J0		
TP - E3- cells P33-P47-J32		
TP - E3- cells AE1-AE15-J0	<ol style="list-style-type: none"> 1. The RBNS claims are reserved case by case when the claim is estimated to exceed a predefined threshold. The claims under this threshold are not reserved since it would not enhance the reserving process and accuracy. The table will then increase costs but not increase the level of reserve accuracy. 2. The accident year approach suits best for the Non-life insurance since the reserving accuracy is more dependent on claim year than the contract entering year. 3. More guidance is needed to handle portfolio transfers. 	
TP - E3- cells AE17-AE31-J0		
TP - E3- cells AE33-AE47-J0		
TP - E3- cells IH1-IE15B		
TP – E4- General	<p>This is not consistent with Solvency II reserving process.</p> <p>Does not give any information, especially in short-tailed business.</p>	

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	<p>This template is overly ambitious and burdensome to create. All base systems do not support open and closed codes, and certainly not reopening codes. For a claim occurring in the current accident year, the claim could be closed and reopened during the same year and it would be impossible to split the payments into paid on closed and reopened claims.</p> <p>The entire form is based upon the assumption that one can distinguish open from closed claims, thus the usability of this report is highly dependent on the reserving process and systems in place; if a case reserve with a standard reserve is used, then the number of claims and closed/open status are relevant. But if such a process is not used and/or not supported by the systems, the number of claims data has poor quality even if it was available.</p> <p>In addition to this, there are lobs, like workers comp or other personal lines, where it is impossible to close a claim. We also feel that the form is too detailed, and it should not be necessary to split on open, closed and reopened claims.</p> <p>The template implies a connection between each individual claim in the base system and the corresponding amount booked in general ledger. (e.g. column 17) This connection does not exist today, and the history is not possible to recreate.</p> <p>Currency: We suggest doing the entire template in converted currency.</p> <p>Accident year/underwriting year: Insurance information by accident year and reinsurance by underwriting year then capturing the nature of the contracts and cover periods.</p>	
TP – E4- Purpose	<p>The number of reopened claims is very low and therefore the systematic follow up haven't been necessary in order to increase the visibility or accuracy of reserving. Also the definition of closed claim may not be systematic between company's and therefore the comparability is poor and information marginal to the reserving process.</p> <p>See CEA comments. Filling the template should not be required in countries where RBNS reserving and classifying claims to open/closed/reopened is not commonly used.</p>	
TP – E4- Benefits	<p>The allocation of open and reopen claims is not enhancing the reserving process since the number of reopen claims is very low and therefore the information is not used in the reserving.</p>	

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TP - E4- Costs	Systematic follow-up of reopened claims will then be costly compared to benefits obtained.	
TP - E4- Groups		
TP - E4- Materiality		
TP - E4- Disclosure		
TP - E4- Frequency		
TP - E4- cells A1-A10		
TP - E4- cells B1-B10		
TP - E4- cells C1-C10		
TP - E4- cells D1-D10		
TP - E4- cells E1-E10		
TP - E4- cells F1-F10		
TP - E4- cells G1-G10		
TP - E4- cells H1-H10		
TP - E4- cells I1-I10		
TP - E4- cells J1-J10		
TP - E4- cells K1-K10		
TP - E4- cells L1-L10		
TP - E4- cells M1-M11		
TP - E4- cells N1-N11		
TP - E4- cells O1-O11		
TP - E4- cells P1-P10		
TP - E4- cells Q1-Q10		
TP - E4- cells R1-R10		
TP - E4- cells S1-S10		
TP - E4- cells T1-T10		

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TP – E6- General

It should be sufficient with 10 accident years in this template.

Other comments re this item are that the data is not readily available from all countries/systems. For example, some systems use average claim and do not have any well defined small reserve amount per claim. So we can only use the paid amount for losses that are not yet closed. Also, in other systems, only claims above some threshold are stored individually from some reporting claim systems. This means that finding the payment amount per claim for smaller claims as at Dec 31st can be difficult, as this information is generally only recorded for the larger losses. Hence, if the claim size categories start below threshold, there can be problems finding the exact numbers in the first categories.

Some systems do not record case estimates, hence we can only use the payments to assess the claim size. Whereas in other systems where, in general, all open claims have a case reserve associated, and we can find the reported incurred claim cost (paid+case) for them. This means that the definition of “claim cost per loss” can be different for various systems and countries.

Since all the figures should be reported in reporting currency, the appropriate currency rates must be applied. Finding the exact time of transaction for all paid amounts can be tricky from some systems/countries, so the amounts in reporting currency will be subject to some uncertainty.

Some definitions must be made for this template to make sense, e.g., should zero-claims be counted? What currency principles to use? Should case estimates be added to the claim cost, and if so, from which countries/systems?

The allocation of collective reserve to each bands doesn't enhance the reserving process or solvency assesment. Although without the allocation of collective reserve this distribution doesn't give the correct insight to company's claim distribution.

Clarification required for certain aspects: How should outstanding claims be valued? Should the reserves be discounted? Should they be at their best estimate or case estimate? Should the risk

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	<p>marginal also be considered? Should inflation be assessed with older claims? Accident year (AY) based reporting should be allowed. (also in LOG!)</p> <p>What is the expected outcome for this template for supervisors?</p>	
TP – E6- Purpose		
TP – E6- Benefits		
TP – E6- Costs		
TP – E6- Groups		
TP – E6- Materiality		
TP – E6- Disclosure		
TP – E6- Frequency		
TP – E6- cells A1-A20		
TP – E6- cells B1-B20		
TP – E6- cells C1-C20		
TP – E6- cells D1-D20		
TP – E6- cells E1-E20		
TP – E6- cells F1-F20		
TP – E6- cells G1-G20		
TP – E6- cells H1-H20		
TP – E6- cells I1-I20		
TP – E6- cells J1-J20		
TP – E6- cells K1-K20		
TP – E6- cells L1-L20		
TP – E6- cells AE1-AE20		
TP – E6- cells AF1-AF20		

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TP – E7A- General		
TP – E7A- Purpose	The required extra claims for each line of business are not significant for the listing since some insurance lines doesn't incude major individual risks.	
TP – E7A- Benefits		
TP – E7A- Costs	Costly for the mass insurance lines where the peak risks are not defined but are handled with special rating.	
TP – E7A- Groups		
TP – E7A- Materiality		
TP – E7A- Disclosure		
TP – E7A- Frequency		
TP – E7A- cell A1		
TP – E7A- cell B1		
TP – E7A- cell C1		
TP – E7A- cell D1		
TP – E7A- cell E1		
TP – E7A- cell F1		
TP – E7A- cell G1		
TP – E7A- cell H1		
TP – E7A- cell I1		
TP – E7A- cell J1		
TP – E7A- cell K1		
TP – E7A- cell L1		
TP – E7A- cell M1		
TP – E7B- General	Filling this template requires tremendous amount of work. For example Other motor insurance-LoB the Sum insured (SI) is a function of time (the value of vehicles are reduced as they are aged). SI is found in core systems for some LoB:s only, thus for several LoB:s individual approximate-	

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	<p>based models should be build. The usefulness of the information is highly questionable, as this does not take into account of the propability of the maximum loss occurring.</p> <p>The sum insured hasn't beed evaluated in mass insurance lines where special rating is used (for exemple home full value insurance). The risks is handled with special rating and classification factors. The evaluation of each sum insured will lead to inconsistency between company's results and will unnecessarily burden the tariff process if done during pricing.</p> <p>The following requirements are especially difficult and costful to obtain compared to the questionable benefits:</p> <ul style="list-style-type: none"> • A policy cover comprising a number of buildings across the country must be broken down. • An overall cover which can not be seen as a single underwriting risk must be broken down. • In case of joint liability through co-insurance, the part belonging to a defaulting co-insurer must be included in the sum insured as well. 	
TP – E7B- Purpose	Should be filled only for large risk lines where the sum insured evaluation is a tarif factor.	
TP – E7B- Benefits		
TP – E7B- Costs		
TP – E7B- Groups		
TP – E7B- Materiality		
TP – E7B- Disclosure		
TP – E7B- Frequency		
TP – E7B- cell A01		
TP – E7B- cell A1		
TP – E7B- cell B1		

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TP – E7B- cell C1		
TP – E7B- cell D1	The sum insured hasn't been evaluated in mass insurance lines where special rating is used (for example home full value insurance). The risks are handled with special rating and classification factors. The evaluation of each sum insured will lead to inconsistency between company's results.	
TP – E7B- cell E1		
Re - J1- General	<p>We query the supervisory purpose of requesting only LOBs with facultative risks, if the purpose is to evaluate the vulnerability of a single risk event, we propose to report the 10 largest single risks covered with facultative reinsurance.</p> <p>Definition of FAC: Are Reverse Flow and Co-reinsurance programs with Limit/SI/EML for single client exceeding Treaty limit or totally outside treaty, to be regarded as facultative reinsurance and be included in this section?</p> <p>The term Facultative generally means reinsurance for one single risk as opposed to treaty which is reinsurance of portfolio. Facultative reinsurance is also commonly used as a mechanism in industrial insurance in various risk sharing solutions. These situations are because the client wishes to share the risk, and not because the "risk doesn't fit into the regular policy acceptance of the insurance company ". Clarification needed if also captive and coinsurance risks are intended.</p>	
Re - J1- Purpose		
Re - J1- Benefits		
Re - J1- Costs		
Re - J1- Groups		
Re - J1- Materiality		
Re - J1- Disclosure		
Re - J1- Frequency		
Re - J1- cell A00		
Re - J1- cell A1		

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Re - J1- cell B1		
Re - J1- cell C1		
Re - J1- cell D1		
Re - J1- cell E1		
Re - J1- cell F1		
Re - J1- cell G1		
Re - J1- cell H1		
Re - J1- cell I1		
Re - J1- cell J1		
Re - J1- cell K1		
Re - J1- cell L1		
Re - J1- cell M1		
	<p>Definitions in LOG are too detailed, for example EML:</p> <p style="padding-left: 40px;">The Solvency II statement (LOG document) is not compatible with the way in which we calculate a fire EML for properties. The essential difference is that we do <u>not</u> take in to account all factors likely to lessen the extent of the loss.</p> <p style="padding-left: 40px;">For example, in our EML estimates no allowance is made of active fire protection systems, such as sprinkler protection. Taking in to account all factors likely to lessen the extent of the loss would be more consistent with our Normal Loss Expectancy (NLE) assessment.</p> <p style="padding-left: 40px;">To the best of our knowledge, our method of assessing the fire loss potential to property at a site is consistent with property loss assessment techniques used by all property insurance companies.</p> <p style="padding-left: 40px;">Although the terms EML and NLE may vary between companies, the disregard of active protection systems is a fundamental aspect of the EML assessment.</p>	
Re - J1- cell N1		
Re - J1- cell P1		
Re - J1- cell Q1		

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Re - J1- cell W1		
Re - J1- cell Y1		
Re - J1- cell Z1		
Re - J1- cell AB1	Remove "reinsurance" from the definition in LOG document to make it clearer.	
Re - J1- cell AC1		
Re - J1- cell A01		
Re - J1- cell A11		
Re - J1- cell B11		
Re - J1- cell C11		
Re - J1- cell D11		
Re - J1- cell E11		
Re - J1- cell F11		
Re - J1- cell G11		
Re - J1- cell H11		
Re - J1- cell I11		
Re - J1- cell J11		
Re - J1- cell K11		
Re - J1- cell L11		
Re - J1- cell M11		
Re - J1- cell O11		
Re - J1- cell U11		
Re - J1- cell W11		
Re - J1- cell X11		
Re - J1- cell Z11		
Re - J1- cell AA11		
Re - J2- General	Referring to treaties in the LOG document – is this really what should be reported in this template or is it all ceded reinsurance?	

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	<p>Shall all ceded business be included irrespective of the size of the portfolio/risk ceded?</p> <p>Reinsurance treaties are not purchased so that 2014 treaties can be reported fully in 2013. Only estimates.</p> <p>20% materiality threshold is reasonable, however depending of the size of the treaty in question, as individual treaties may be insignificant. Rather overall 20% change.</p> <p>Report contains information that is not available in reinsurance systems and has to be manually added. As this is an extensive report it should contain information that is readily available in systems. Are risks/policies that are reinsured to captives or fronted to other insurance companies considered as program or facultative placements?</p> <p>Reporting “when needed” means quarterly.</p>	
Re – J2- Purpose		
Re – J2- Benefits		
Re – J2- Costs	<p>There will be a lot of added costs if all needed data has to be added to reinsurance system (e.g. progressive sections, progressive number and quantity of surplus/layers in program, EIOPA codes and names of Reinsured, Reinsurer and Broker, Type of treaty, Catastrophic guarantees specifications).</p>	
Re – J2- Groups		
Re – J2- Materiality		
Re – J2- Disclosure		
Re – J2- Frequency		
Re - J2- cell A1		
Re - J2- cell B1		
Re - J2- cell C1		

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Re - J2- cell D1		
Re - J2- cell E1	Progressive number of surplus/layer in program only works for simple structures, as only the excess point and limit in combination with program share will define the position of an agreement in a reinsurance program. Common rules need to be specified to assign numbering of surplus/layer in program.	
Re - J2- cell F1		
Re - J2- cell G1		
Re - J2- cell H1	How should treaties that include several LoB's be reported. E.g. Event covers usually cover both FOP, MAT, MOC etc.	
Re - J2- cell I1		
Re - J2- cell J1		
Re - J2- cell K1		
Re - J2- cell L1		
Re - J2- cell M1		
Re - J2- cell N1		
Re - J2- cell O1	See comment to Re - J1 cell N1.	
Re - J2- cell P1		
Re - J2- cell Q1		
Re - J2- cell R1		
Re - J2- cell S1		
Re - J2- cell T1		
Re - J2- cell U1		
Re - J2- cell V1		
Re - J2- cell W1		
Re - J2- cell X1		
Re - J2- cell Y1		
Re - J2- cell Z1		
Re - J2- cell AA1	What is the distinction between reinsurance commission and overriding commission?	

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Re - J2- cell AB1	What is the distinction between reinsurance commission and overriding commission?	
Re - J2- cell AC1		
Re - J2- cell AD1		
Re - J2- cell AE1		
Re - J2- cell AF1		
Re - J2- cell AG1		
Re - J2- cell AM1		
Re - J2- cell AO1		
Re - J2- cell AP1		
Re - J2- cell AQ1		
Re - J3- General		
Re - J3- Purpose		
Re - J3- Benefits		
Re - J3- Costs		
Re - J3- Groups		
Re - J3- Materiality		
Re - J3- Disclosure		
Re - J3- Frequency		
Re - J3- cell A1		
Re - J3- cell B1		
Re - J3- cell C1		
Re - J3- cell D1	Better definitions needed. Some companies use the same legal entity for both direct insurance (=insurer) and assumed treaty reinsurance (=reinsurer).	
Re - J3- cell E1		
Re - J3- cell F1		

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Re - J3- cell G1		
Re - J3- cell H1		
Re - J3- cell I1		
Re - J3- cell J1		
Re - J3- cell L1		
Re - J3- cell M1		
Re - J3- cell O1		
Re - J3- cell P1		
Re - J3- cell Q1		
Re - J3- cell R1		
SPV - General		
SPV - Purpose		
SPV - Benefits		
SPV - Costs		
SPV - Groups		
SPV - Materiality		
SPV - Disclosure		
SPV - Frequency		
SPV- cell A1		
SPV- cell B1		
SPV- cell B1A		
SPV- cell C1		
SPV- cell D1		
SPV- cell E1		
SPV- cell F1		

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SPV- cell F1A		
SPV- cell G1		
SPV- cell H1		
SPV- cell I1		
SPV- cell J1		
SPV- cell K1		
SPV- cell L1		
SPV- cell M1		
SPV- cell N1		
SPV- cell O1		
SPV- cell P1		
SPV- cell Q1		
SPV- cell R1		
SPV- cell S1		
SPV- cell T1		
SPV- cell V1		
SPV- cell W1		
SPV- cell X1		
SPV- cell Y1		
SPV- cell Z1		
G01-Purpose	A mix of SII and IFRS items in this report.	
G01-Benefits		
G01-Costs		
G01-Application		
G01-Materiality		
G01-Disclosure		

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G01-Frequency		
G01- cell A1		
G01- cell B1		
G01- cell C1		
G01- cell D1		
G01- cell E1		
G01- cell F1		
G01- cell G1		
G01- cell H1		
G01- cell I1		
G01- cell J1	How is underwriting performance defined. Is it related to the Variation analysis disclosed under VA-C2C?	
G01- cell K1		
G01- cell L1	J1+K1 will not equal L1 because taxes and other "other" items will only be included in L1. Further clarification needed. LOG! How is „Total performance“ defined. Is this related to Profit before tax (IFRS) or is this in any way related to VA-templates.	
G01- cell M1		
G01- cell N1		
G01- cell O1		
G01- cell P1		
G01- cell Q1		
G01- cell R1		
G01- cell S1		

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G01- cell T1		
G01- cell U1		
G01- cell V1		
G03 & G04-Purpose		
G03 & G04-Benefits		
G03 & G04-Costs		
G03 & G04-Application		
G03 & G04-Materiality		
G03 & G04-Disclosure		
G03 & G04-Frequency		
G03- cell A1		
G03- cell B1		
G03- cell C1		
G03- cell D1		
G03- cell E1		
G03- cell F1		
G03- cell G1		
G03- cell H1		
G03- cell I1		
G03- cell J1		
G03- cell K1	LOG: Definition is not correct – only copied from cell J1.	
G03- cell L1		
G03- cell M1		
G03- cell N1		
G03- cell O1		
G03- cell P1		

Comments Template on Draft proposal for Quantitative Reporting Templates		Deadline 20 January 2012 12:00 CET
G04- cell A1		
G04- cell A2		
G04- cell B1		
G04- cell C1		
G04- cell D1		
G04- cell E1		
G14-Purpose		
G14-Benefits		
G14-Costs		
G14-Application		
G14-Materiality		
G14-Disclosure		
G14-Frequency		
G14- cell A1		
G14- cell B1		
G14- cell C1		
G14- cell D1		
G14- cell E1		
G14- cell F1		
G14- cell G1		
G14- cell H1		
G14- cell I1		
G14- cell J1		
G14- cell K1		
G14- cell L1		
G14- cell M1		

Comments Template on Draft proposal for Quantitative Reporting Templates		Deadline 20 January 2012 12:00 CET
G14- cell N1		
G14- cell O1		
G14- cell P1		
G14- cell Q1		
G14- cell R1		
G20-Purpose		
G20-Benefits		
G20-Costs		
G20-Application		
G20-Materiality		
G20-Disclosure		
G20-Frequency		
G20- cell A1		
G20- cell B1		
G20- cell C1		
G20- cell D1		
G20- cell E1		
G20- cell F1		
G20- cell I1		
G20- cell J1		
G20- cell K1		
IGT1 to IGT4-Purpose		
IGT1 to IGT4-Benefits		
IGT1 to IGT4-Costs		
IGT1 to IGT4-Application		
IGT1 to IGT4-Materiality		

**Comments Template on
Draft proposal for Quantitative Reporting Templates**

**Deadline
20 January 2012
12:00 CET**

IGT1 to IGT4-Disclosure		
IGT1 to IGT4-Frequency		
IGT1- cell B6		
IGT1- cell C6		
IGT1- cell D6		
IGT1- cell E6		
IGT1- cell F6		
IGT1- cell G6		
IGT1- cell H6		
IGT1- cell I6		
IGT1- cell J6		
IGT1- cell K6		
IGT1- cell L6		
IGT1- cell M6		
IGT1- cell N6		
IGT1- cell O6		
IGT1- cell P6		
IGT1- cell Q6		
IGT1- cell R6		
IGT1- cell S6		
IGT2- cell B6		
IGT2- cell C6		
IGT2- cell D6		
IGT2- cell E6		
IGT2- cell F6		
IGT2- cell G6		

Comments Template on Draft proposal for Quantitative Reporting Templates		Deadline 20 January 2012 12:00 CET
IGT2- cell H6		
IGT2- cell I6		
IGT2- cell J6		
IGT2- cell K6		
IGT2- cell L6		
IGT2- cell M6		
IGT2- cell N6		
IGT2- cell O6		
IGT2- cell P6		
IGT2- cell Q6		
IGT2- cell R6		
IGT2- cell S6		
IGT2- cell T6		
IGT2- cell U6		
IGT2- cell V6		
IGT2- cell W6		
IGT3- cell B6		
IGT3- cell C6		
IGT3- cell D6		
IGT3- cell D6		
IGT3- cell E6		
IGT3- cell F6		
IGT3- cell G6		
IGT3- cell H6		
IGT3- cell I6		
IGT3- cell J6		

Comments Template on Draft proposal for Quantitative Reporting Templates		Deadline 20 January 2012 12:00 CET
IGT3- cell K6		
IGT3- cell L6		
IGT3- cell M6		
IGT3- cell N6		
IGT3- cell O6		
IGT4- cell B5		
IGT4- cell C5		
IGT4- cell D5		
IGT4- cell E5		
IGT4- cell F5		
IGT4- cell G5		
IGT4- cell H5		
IGT4- cell I5		
IGT4- cell J5		
IGT4- cell K5		
IGT4- cell L5		
IGT4- cell M5	Should be M6: Clarification of LOG needed. What value should be reported?	
IGT4- cell N5		
IGT4- cell O5		
IGT4- cell P5		
RC-Purpose		
RC-Benefits		
RC-Costs		
RC-Application		
RC-Materiality		
RC-Disclosure	What does simplified version mean?	

Comments Template on Draft proposal for Quantitative Reporting Templates		Deadline 20 January 2012 12:00 CET
RC-Frequency		
RC- cell A2		
RC- cell A3		
RC- cell A4		
RC- cell A5		
RC- cell A6		
RC- cell A7		
RC- cell A8		
RC- cell A9		
RC- cell A10		
RC- cell A11		
RC- cell A12		
RC- cell A13	What is the SII value of the exposure? Clarification needed? Is this applicable for reinsurance?	
RC- cell A14	Could USD be a group currency in EU?	
RC- cell A15	Definition is not clear e.g. What is max value for a derivative? Is this only applicable for reinsurance?	
RC- cell A16		
RC- cell A17		
RC- cell A18		