

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

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

Name of Company:	Royal London Group	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public

Please follow the following instructions for filling in the template:

- ⇒ 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 empty.
- ⇒ Please fill in your comment in the relevant row. If you have no comment on a paragraph or a cell, keep the row empty.
- ⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below.
 - 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.

Please send the completed template, in Word Format, to

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cp009@eiopa.europa.eu. Our IT tool does not allow processing of any other 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	There is no information on the units of the amounts to be reported. £, £000 or £m?
3.1	
3.2	
3.3	Group reports should be produced by the ultimate parent. There will be duplication if sub-groups have to report separately. What would be required for a non-EEA sub-group that is itself part of an EEA group? Are only EEA sub-groups covered by these requirements
3.4	
3.5	
3.6	National specific templates should be kept to the mimimum. Only those really needed for supervisory purposes or for legal requirements should be allowed.
4.1	
4.2	
4.3	Clarity is required around whether we are expected to publish blank forms where the form is not relevant to our organisation or whether the form should be omitted.
4.4	
4.5	

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4.6		
4.7		
4.8	Where forms apply to specific ring fenced funds, there is no place on the forms to specify which fund they relate to.	
4.9		
4.10		
4.11		
Technical Annex (only for inconsistencies)		
BS-C1 – General	<p>A full reconciliation will be difficult to achieve and will include too much detail to be useful. For example for an IFRS preparer the assets and liabilities of unit linked funds will be shown in the individual lines of the IFRS balance sheet. In the SII balance sheet the linked funds' assets and liabilities will be shown in the single line A12. Therefore there will be differences related to linked assets in most lines of the balance sheet.</p> <p>The information that is of real use to a user is to show assets and liabilities that are included in one balance sheet but not the other or are included at a different value. Therefore a more useful reconciliation would be to show the differences between total assets in one balance sheet and total assets in the the other and likewise for total liabilities.</p> <p>In the IFRS column, should assets and liabilities be shown in the categories that they would be included in the IFRS balance sheet or as they are shown in the SII balance sheet. For example assets in unit linked funds. In the IFRS balance sheet these are shown in the relevant asset or liability lines. In the SII balance the total net assets of linked funds are shown in the single line A12. Should the assets and liabilities of linked funds be shown in AS12 of the IFRS column or in the individual asset and liability lines as they would be for the IFRS balance sheet. Another example is 'cash and cash equivalents'. The SII and IFRS definitions of this item are different. Should the IFRS column be populated according to the SII definition or the IFRS definition ?</p>	
BS-C1 – Purpose		

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BS-C1 – Benefits		
BS-C1 – Costs		
BS-C1 – Groups		
BS-C1 – Materiality		
BS-C1 - Disclosure		
BS-C1 – Frequency	<p>The requirement for a quarterly balance sheet needs to be made more clear and more certain. If companies only know whether or not they need to submit a balance sheet once they know if the reconciliation reserve meets certain criteria, then in practice the balance sheet will need to be prepared just in case it is needed – there will not be time to go back and prepare one if the reconciliation reserve cannot be explained.</p> <p>There should be an overall materiality criteria, ie ‘big’ insurers have to submit a quarterly balance sheet and ‘small’ insurers do not.</p>	
BS-C1 – cell AS1		
BS-C1- cell AS24		
BS-C1- cell A2		
BS-C1- cell AS2		
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		

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BS-C1- cell A7		
BS-C1- cell AS7		
BS-C1- cell A7A		
BS-C1- cell AS7A		
BS-C1- cell A8		
BS-C1- cell AS8		
BS-C1- cell A8A		
BS-C1- cell AS8A		
BS-C1- cell A8C		
BS-C1- cell AS8C		
BS-C1- cell A8D		
BS-C1- cell AS8D		
	<p>This comment relates to A9 to A9E. Further guidance is required on how to perform the split of investment funds. This should be a high level split only and not a full look-through. For example a government bond fund may hold a small amount of cash and receivables. The whole value of the fund should be shown as 'government bonds in invested funds'. The alternative of showing only the bond value in 'government bonds in invested funds' and the cash and receivables in 'other financial assets in invested funds' will be very onerous to do and of limited value to the user. A9-A9E –is the look-through information expected to agree back to Assets-D4 (i.e. is the same level of look-through expected for both the Balance Sheet and the specific look-through template).</p>	
BS-C1- cell AS9		
BS-C1- cell AS9A		
BS-C1- cell AS9B		
BS-C1- cell AS9C		
BS-C1- cell AS9D		
BS-C1- cell AS9E		
BS-C1- cell AS9F		

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BS-C1- cell A10A		
BS-C1- cell AS10A		
BS-C1- cell A10B		
BS-C1- cell AS10B		
BS-C1- cell A14		
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		
BS-C1- cell AS17		
BS-C1- cell A18		
BS-C1- cell AS18		
BS-C1- cell A18A		
BS-C1- cell AS18A		
BS-C1- cell A19		
BS-C1- cell AS19		
BS-C1- cell A19A		
BS-C1- cell AS19A		
BS-C1- cell A13		
BS-C1- cell AS13		
BS-C1- cell A21		
BS-C1- cell AS21		

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BS-C1- cell A20		
BS-C1- cell AS20		
BS-C1- cell A23	Should prepayments and accrued income be included in here or in cell A29 ?	
BS-C1- cell AS23		
BS-C1- cell A27		
BS-C1- cell AS27		
BS-C1- cell A29	Should prepayments and accrued income be included in here or in cell A23 ?	
BS-C1- cell AS29		
BS-C1- cell LS1		
BS-C1- cell L1A		
BS-C1- cell L2		
BS-C1- cell L3		
BS-C1- cell LS4		
BS-C1- cell L4A		
BS-C1- cell L5		
BS-C1- cell L6		
BS-C1- cell LS6B		
BS-C1- cell L6C		
BS-C1- cell L6D		
BS-C1- cell L6E		
BS-C1- cell LS7		
BS-C1- cell L7A		
BS-C1- cell L8		
BS-C1- cell L9		
BS-C1- cell LS10		
BS-C1- cell L10A		

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BS-C1- cell L11		
BS-C1- cell L12		
BS-C1- cell L23	Contingent liabilities should NOT be included on the balance sheet. They could be disclosed separately. By their nature contingent liabilities are uncertain either in respect of the amount payable, whether or not an amount is actually payable or both. It is doubtful that a sufficiently robust value can be put on these 'liabilities'.	
BS-C1- cell L18		
BS-C1- cell LS18		
BS-C1- cell L22		
BS-C1- cell LS22		
BS-C1- cell L13		
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		

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BS-C1- cell LS15C		
BS-C1- cell L15D		
BS-C1- cell LS15D		
BS-C1- cell L25		
BS-C1- cell LS25		
BS-C1- cell L26	The Log states that this cell should be equal to A10 on OF-B1. There does not seem to be a cell A10 on this form ? Should it be A13?	
BS-C1B - General		
BS-C1B - Purpose		
BS-C1B - Benefits		
BS-C1B - Costs		
BS-C1B - Groups		
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		

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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		
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		

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BS-C1D – Benefits		
BS-C1D – Costs		
BS-C1D – Groups	The template will be very difficult to do for groups.	
BS-C1D – Materiality	The materiality threshold for this template is essential to avoid excessive disclosure and associated cost. The suggested limit of 90% of total assets and liabilities is reasonable.	
BS-C1D - Disclosure		
BS-C1D – Frequency		
BS-C1D- cell A1		
BS-C1D- cell B1		
BS-C1D- cell C1		
BS-C1D- cell D1		
BS-C1D- cell E1		
BS-C1D- cell A3	How should investment funds be included – in the currency that the fund is denominated in or by looking-through to the underlying assets and liabilities. If it is on a look-through basis, this will be extremely difficult to do.	
BS-C1D- cell A4		
BS-C1D- cell A5	Should linked funds be included at the currency of the fund or on a look-through to the underlying assets and liabilities held by the fund ?	
BS-C1D- cell A5A		
BS-C1D- cell A6		
BS-C1D- cell A7		
BS-C1D- cell A8		
BS-C1D- cell A9	How should linked TPs be classified. If a linked fund holds assets in multiple currencies should the TPs be classified according to these underlying currencies or in the reporting currency ?	
BS-C1D- cell A10		
BS-C1D- cell A11		

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BS-C1D- cell A12		
BS-C1D- cell A13		
BS-C1D- cell A14		
BS-C1D- cell A16		
Country - K1- General	It would be helpful if 'Class of business' was replaced with 'Line of Business' to be consistent with A1.	
Country - K1- Purpose		
Country - K1- Benefits		
Country - K1- Costs		
Country - K1- Groups		
Country - K1- Materiality		
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		
	The definition of commission given is 'Expenses arising from the acquisition of insurance contracts'. Acquisition expenses would normally include not just commission but also the costs of the new business team, underwriters etc. Also, what about renewal commission.	
Country - K1- cell E1	The definition should be clarified. Is the intention that it should be acquisition commission only ?	
Country - K1- cell E2		

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Country - K1- cell E3		
Country - K1- cell E4		
Country - K1- cell H1	Presumably the number of claims paid and average costs for these cells relates to the claims paid in the relevant year ?	
Country - K1- cell H2		
Country - K1- cell H3		
Country - K1- cell H1A		
Country - K1- cell H2A		
Country - K1- cell H3A		
Cover - A1A & Q- General	Accounting and actuarial data do not currently contain information on the residence of the insured life, so the localisation of the risk is not readily available.	
Cover - A1A & Q- Purpose		
Cover - A1A & Q- Benefits		
Cover - A1A & Q- Costs		
Cover - A1A & Q- Groups	Should the group version of this template only include insurance entities within the group or all entities within the group ?	
Cover - A1A & Q- Materiality	We fully support the proposal to have a materiality threshold. However it would seem proportionate that if an insurer has >90% of written premiums in its home country then it should be exempted completely from this template.	
Cover - A1A & Q- Disclosure		
Cover - A1A & Q- Frequency		
Cover - A1A- cell A1		
Cover - A1A- cell A2		
Cover - A1A- cell A3		
Cover - A1A- cell A4		
Cover - A1A- cell A5		

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Cover - A1A- cell A6		
Cover - A1A- cell A7		
Cover - A1A- cell A8		
Cover - A1A- cell A9		
Cover - A1A- cell A10		
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		
Cover - A1A- cell E1B		
Cover - A1A- cell F1B		

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Cover - A1A- cell G1B		
Cover - A1A- cell E1C		
Cover - A1A- cell F1C		
Cover - A1A- cell G1C		
Cover - A1A- cell E1D		
Cover - A1A- cell F1D		
Cover - A1A- cell G1D		
Cover - A1A- cell E1E		
Cover - A1A- cell F1E		
Cover - A1A- cell G1E		
Cover - A1A- cell I1	<p>The definitions of written and earned premiums given seem more applicable to non-life business than to life business.</p> <p>There is currently no distinction drawn between written and earned premiums for life business and the accounting systems only record premiums one way. It would be extremely onerous to have to change the basis of recognition of premiums to show them two different ways.</p> <p>In any case, the basis of recongition of premiums has to be consistent with the way that premiums are recognised in the valuation of technical provisions (which they are currently for regulatory reporting and accounts). If there are two ways of recognising premiums then this would need to be reflected in two different sets of technical provisions. This does not seem proportionate.</p>	
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		

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Cover - A1A- cell I7		
Cover - A1A- cell I8		
Cover - A1A- cell I9		
Cover - A1A- cell I10		
Cover - A1A- cell I11		
Cover - A1A- cell J1		
Cover - A1A- cell I11A		
Cover - A1A- cell J1A		
Cover - A1A- cell L1	The definiton refers to claims paid. This implies that this is required on a cash basis. It would be more meaningful if it was on an accruals basis.	
Cover - A1A- cell M1		
Cover - A1A- cell L1A	<p>This comment applies to all the expenses cells – L1 to P1. The Log refers to expenses ‘paid’. This implies that these shouldbe on a cash basis. This should be changed to an accruals basis as this is the way that expenses are recorded and used by management.</p> <p>This comment applies to all expenses cells L1 to P1. The template asks for expenses gross and net of reinsurance. The Log definition is ‘share ceded to reinsurance’. Expenses are not ceded to reinsurers. The reinsurers’ share of expenses lines should be deleted.</p> <p>The definition of admin expenses is not clear. For example it is not clear what would be included here and not in overheads and vice-versa.</p> <p>It would be much simpler if there was a single category of expenses, as on A1Q. Alternatively there should be fewer categories of expenses, for example :</p> <p>Acquisition costs, investment management costs, costs of servicing business (including claims) and other.</p>	
Cover - A1A- cell M1A	See comment in L1A above. Reinsurers’ share of expenses is meaningless and should be deleted.	
Cover - A1A- cell O1		
Cover - A1A- cell P1	See comment in L1A above. Reinsurers’ share of expenses is meaningless and should be deleted.	
Cover - A1A- cell O1A		
Cover - A1A- cell P1A	See comment in L1A above. Reinsurers’ share of expenses is meaningless and should be deleted.	

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Cover - A1A- cell O1B	The log definition of 'acquisition' expenses would seem to only include commission and sales staff costs. Should other costs related to writing new business, eg underwriting, be under admin expenses ?	
Cover - A1A- cell P1B	See comment in L1A above. Reinsurers' share of expenses is meaningless and should be deleted.	
Cover - A1A- cell O1C	The log definition states that this includes overheads incurred in servicing business. Does this mean direct costs for servicing business are in admin expenses. We do not believe that this split provides useful or meaningful information.	
Cover - A1A- cell P1C	See comment in L1A above. Reinsurers' share of expenses is meaningless and should be deleted.	
Cover - A1Q- cell A1		
Cover - A1Q- cell A2		
Cover - A1Q- cell A3		
Cover - A1Q- cell A4		
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		

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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		
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		

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OF - B1A & B1Q – General	<p>The group version of the template shows the non-available items in A1A, A5, A10, A11 etc as positive numbers. The total basic own funds at group level in A21 therefore has to be calculated by adding some cells in column A and deducting others. Would it not be simpler and easier for the user to follow if the non-available items were shown as negative numbers ? Then A21 could simple be the aggregate of column A.</p> <p>The total BOF on the group own funds form, cell A21. The formula for this cell does not pick up all the rows, eg A15A is excluded.</p> <p>The non-available items of group BOF seem to be being deducted twice. The formula in cell A21 deducts them from total BOF, but the formula in cell B29A is also deducting the from the recnciliation reserve. These items should not be included in the reconciliation reserve.</p> <p>The draft delegated acts require the value of subs other than credit and financial insitutions to be included as part of the reconciliation reserve for group own funds. There is no box on the draft template for this to be done.</p>	
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		
OF - B1A- cell B6		

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OF - B1A- cell B10		
OF - B1A- cell C10		
OF - B1A- cell D10		
OF - B1A- cell B11	<p>This comment relates to A12 and A12A. There is no comment box for A12. The log states that the reconciliation reserve reconciles valuation differences between the accounts and SII. In its current form it does not do this. The analysis of the reconciliation reserve in B23 starts with the SII excess of assets over liabilities. If it started with the accounts value of assets over liabilities and then required a reconciliation of this to the SII value, the nit would achieve what the log states.</p>	
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		
OF - B1A- cell B31		
OF - B1A- cell C33		
OF - B1A- cell C34		

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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	The value of own funds of credit and financial institutions that is included here does not seem to be included in own funds, ie A45C is not included in any sub-total of own funds.	
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 B65		
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		
OF - B1A- cell B98		

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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	Where sub-debt is listed we will not the 'lender'. What should be entered here ?	
OF - B1A- cell F100.1		
OF - B1A- cell G100.1	Where sub-debt is listed there will be multiple counterparties. What should be entered here ?	
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		
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		
OF - B1A- cell H100.n		
OF - B1A- cell I100.n		

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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		
OF - B1A- cell K106.1		
OF - B1A- cell L106.1		

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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		
OF - B1A- cell E110		
OF - B1A- cell B111		

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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		
OF - B1A- cell F116		
OF - B1A- cell A130.1		

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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		
OF - B1A- cell M130.n		
OF - B1Q- cell C1A		

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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		
OF - B1Q- cell C34		
OF - B1Q- cell C35		

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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>The variance analysis is essentially doing the job of a profit and loss account. Would it not be simpler to have a Solvency II profit and loss account? The other changes captured on the VA forms are already on OF-B1A so are just repeated here.</p> <p>Some of the VA templates seem to require income and expense items on a cash basis and others on an accruals basis. All figures should be required on an accruals basis. To produce cash basis figures would require considerable changes to the way that accounting data is currently captured and recorded. As accruals basis values are required for IFRS reporting, two sets of numbers would be needed.</p>	
VA - C2A - Purpose	<p>The template circulated in early 2011 looked very much like an EEV income statement and would therefore have provided management with useful information which could be used to help run the business. The latest templates separate analysis of change in assets from analysis of change</p>	

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	in technical provisions. So, for example, an increase in the asset share of a with profits policy might be exactly in line with expectation but it would appear as an increase in assets in C2B and as a corresponding increase in liabilities in C2C . Also within the analysis of change in technical provisions there is no attempt to compare actual with expected change. As a result the completion of these templates will be little more than a box ticking exercise which provides no meaningful information to management. We will therefore still want to produce the 'EEV income statement' type of analysis. The template as currently proposed will be of minimal use to management.	
VA – C2A – Benefits		
VA – C2A - Costs		
VA – C2A – Groups	To produce the VA templates at group level would require combining information from insurance companies (including non-EEA) and nn-insurance entities.	
VA - C2A – Materiality		
VA - C2A – Disclosure		
VA – C2A – Frequency		
VA - C2B– General	This template is over complicated. A simplified version (which would work) and which gives the same information would be as follows: <ul style="list-style-type: none"> • Opening market value • + or - Fair value gains in the period • + Income in the period (on an accruals basis) • - Investments sold (proceeds of sale) • + Investments acquired (purchase cost) • = Closing market value 	
VA – C2B – Purpose		
VA – C2B – Benefits		
VA – C2B - Costs	There will be considerable costs to implement and maintain this report. For example the requirement to have income on a paid basis whereas it is needed on an accruals basis for IFRS.	

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	Also the need to split fair value gains between assets held at the beginning of the period, assets acquired and assets sold.	
VA - C2B - Groups		
VA - C2B - Materiality		
VA - C2B - Disclosure		
VA - C2B - Frequency		
VA C2B - cell AA2	The log definition is unclear. What is meant by investment expenses 'related to insurance...obligations'? Does this mean the expenses of managing the assets backing insurance liabilities?	
VA C2B -cell A1	Why is this requested on a cash received basis. This should be on an accruals basis. If it is on a cash basis then it will not explain the movement in BOF as part of the movement in BOF is the movement in accruals. In addition it will be onerous to produce this information on a cash received basis as it is currently recorded on an accruals basis. This information is already on Assets D3. Couldn't the information be copied from there?	
VA C2B -cell A2	See comment in A1, this should be on an accruals basis.	
VA C2B -cell A3	See comment in A1, this should be on an accruals basis.	
VA C2B -cell A4	See comment in A1, this should be on an accruals basis.	
VA C2B -cell A6	Why are fair value gains split between cells A6 to A8. This does not add any value. Surely all that is needed is the total fair value gains in the period. The asset admin systems do not calculate and store gains in this way. This will require extensive IT development to achieve.	
VA C2B -cell A7		
VA C2B -cell A8		
VA C2B -cell O1		
VA C2B -cell O2		
VA C2B -cell O3	This comment relates to cell O4. The formula in this cell is wrong. O4 will not be equal to A9. Similarly O5 will not equal to O1 +O2 - O3 +O4.	
VA - C2C- General	This template appears to be a mixture of accounting and actuarial data. It needs to be clarified if	

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	<p>this is the case or not. If accounting data is required to provide the premiums and claims then there will be considerable IT development and cost. Premiums and claims are not identified within the accounting systems as being in relation to policies written in the year or policies in existence at the start of the year. To provide this split would require extensive IT development. Premiums, claims and expenses are stated as the amounts 'paid'. This is not how they are recorded or accounted for. Would it not be better for these to be shown on an accruals basis? The template needs to be simplified as it will be very difficult to complete in its current form.</p>	
VA – C2C – Purpose		
VA – C2C – Benefits		
VA – C2C - Costs	<p>See comment under General above. If accounting data is required for premiums and claims there will be considerable IT development needed.</p>	
VA – C2C – Groups		
VA - C2C – Materiality		
VA - C2C – Disclosure		
VA – C2C – Frequency		
VA C2C -cell AA5		
VA C2C -cell A1	<p>This cell asks for 'contracts underwritten' in the year. Is this only new contracts? Should it include increments written on contracts in force at the beginning of the year. It will be very onerous to split out the premiums for new contracts in the year. It will be far harder to separately identify premiums for increments. Premiums should be on an accruals basis, not on a cash received basis. This template is mixing accounting and actuarial data. It would be more practical if the template showed the movement in technical provisions using only the premiums, claims and expenses data used within the actuarial models.</p>	
VA C2C -cell B1	<p>Is this intended to be an 'actual' figure from the accounting system or an estimate of the actual figure from the actuarial model? Mixing figures from accounting and actuarial models is potentially problematic and a far more meaningful analysis would be produced if all figures in this template came from the actuarial models.</p>	

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VA C2C -cell C1		
VA C2C -cell D1	Is this intended to be an 'actual' figure from the accounting system or an estimate of the actual figure from the actuarial model? Mixing figures from accounting and actuarial models is potentially problematic and a far more meaningful analysis would be produced if all figures in this template came from the actuarial models.	
VA C2C -cell E1		
VA C2C -cell E1A		
VA C2C -cell G1	Is this intended to be an 'actual' figure from the accounting system or an estimate of the actual figure from the actuarial model? Mixing figures from accounting and actuarial models is potentially problematic and a far more meaningful analysis would be produced if all figures in this template came from the actuarial models.	
VA C2C -cell H1		
VA C2C -cell E1A		
VA C2C -cell A2		
VA C2C -cell B2		
VA C2C -cell D2		
VA C2C -cell E2		
VA C2C -cell G2		
VA C2C -cell A3	Is the change in assumed investment return (which equals the change in assumed discount rate) considered a change in economic assumption or part of the change in discount rate in cell D2)?	
VA C2C -cell B3		
VA C2C -cell C3		
VA C2C -cell A4		
VA C2C -cell B4		
VA C2C -cell C4		
VA C2C -cell D4		
VA C2C -cell E4		

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VA C2C -cell E4A		
VA C2C -cell G4		
VA C2C -cell H4		
VA C2C -cell BB1		
VA C2C -cell CC1		
VA - C2D- General	We are not convinced that this template will work because it is a mixture of profit and loss and balance sheet movements. What the template is trying to do is to analyse the movement in BOF. This would be achieved much more simply by including a SII basis p&l account and supplementing this with any movements in BOF which do not go through p&l, eg issue of subordinated debt. The latter is already captured on OF-B1A in any case.	
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	This should be on an accruals basis not 'paid'.	
VA C2D -cell O4	This should be on an accruals basis not 'paid'.	
VA C2D -cell O6		
VA C2D -cell O7		
VA C2D -cell O8		
VA C2D -cell O9		
VA C2D -cell O10		
VA C2D -cell O11		

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VA C2D -cell O12		
SCR - B2A - General		
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		
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		
SCR - B2A - cell A5		
SCR - B2A - cell B5=A5		
SCR - B2A - cell A6		
SCR - B2A - cell B6		
SCR - B2A - cell A7		
SCR - B2A - cell B7=A7		
SCR - B2A - cell A8		

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SCR - B2A - cell B8		
SCR - B2A - cell A9		
SCR - B2A - cell B9		
SCR - B2A - cell A11		
SCR - B2A - cell A12		
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		

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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		
SCR - B2B- cell B1.n		
SCR - B2B- cell B3		
SCR - B2B- cell B5		
SCR - B2B- cell B6		
SCR - B2B- cell B8		
SCR - B2C – General	Cells B7 and B10 refer to ring fenced funds. If this template is required for each RFF, not clear why capital requirements are needed on each form. Maybe these should be populated in the total form but blank in RFF forms? Maybe this form is only required once. Not clear	
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		

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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		
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	<p>This form will be difficult to populate for RFFs. The SCR is determined at the aggregate level but RFFs can have different stress scenarios applying (e.g. the company in aggregate is exposed to interest rates falling, but some RFFs are exposed to interest rates rising). Hence, populating the template for each subfund will show the true picture for each subfund but will not support the Society’s overall calculation of the SCR. Guidance required here.</p> <p>Similarly, the existence of the subfunds provides synergies within each calculation. Not clear how these will come through in this presentation.</p>	
SCR - B3A – Purpose		

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SCR - B3A – Benefits		
SCR - B3A – Costs		
SCR - B3A – Groups		
SCR - B3A – Materiality		
SCR - B3A - Disclosure		
SCR - B3A – Frequency		
SCR - B3A- cell CO		
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		
SCR - B3A- cell A2		
SCR - B3A- cell A2A		
SCR - B3A- cell B2		
SCR - B3A- cell B2A		
SCR - B3A- cell C2		
SCR - B3A- cell B2B		
SCR - B3A- cell D2		
SCR - B3A- cell C3		
SCR - B3A- cell D3		

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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		
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		

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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		
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		
SCR - B3A- cell A17A		

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SCR - B3A- cell B17		
SCR - B3A- cell B17A		
SCR - B3A- cell C17		
SCR - B3A- cell B17B		
SCR - B3A- cell D17		
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		
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		

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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		
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		

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SCR - B3B- cell B9		
SCR - B3C – General	This form will be difficult to populate for RFFs. The SCR is determined at the aggregate level but RFFs can have different stress scenarios applying (e.g. the company in aggregate is exposed to interest rates falling, but some RFFs are exposed to interest rates rising). Hence, populating the template for each subfund will show the true picture for each subfund but will not support the Society’s overall calculation of the SCR. Guidance required here.	
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		
SCR - B3C- cell B1B		
SCR - B3C- cell D1		
SCR - B3C- cell A2		
SCR - B3C- cell A2A		
SCR - B3C- cell B2		
SCR - B3C- cell B2A		

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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		
SCR - B3C- cell D04		
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		
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		

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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		
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		
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		

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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		
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		
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		

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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		
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		

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SCR - B3D- cell A19		
SCR - B3D- cell A20		
SCR - B3D- cell A21		
SCR - B3D- cell A22		
SCR - B3D- cell A23		
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		
SCR - B3E - Frequency		
SCR - B3E- cell A1		
SCR - B3E- cell A1A		
SCR - B3E- cell B1		
SCR - B3E- cell C1		
SCR - B3E- cell D1		
SCR - B3E- cell E1		
SCR - B3E- cell F1		

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SCR - B3E- cell A2		
SCR - B3E- cell A2A		
SCR - B3E- cell B2		
SCR - B3E- cell C2		
SCR - B3E- cell D2		
SCR - B3E- cell E2		
SCR - B3E- cell F2		
SCR - B3E- cell A3		
SCR - B3E- cell A3A		
SCR - B3E- cell B3		
SCR - B3E- cell C3		
SCR - B3E- cell D3		
SCR - B3E- cell E3		
SCR - B3E- cell F3		
SCR - B3E- cell A4		
SCR - B3E- cell A4A		
SCR - B3E- cell B4		
SCR - B3E- cell C4		
SCR - B3E- cell D4		
SCR - B3E- cell E4		
SCR - B3E- cell F4		
SCR - B3E- cell A5		
SCR - B3E- cell A5A		
SCR - B3E- cell B5		
SCR - B3E- cell C5		
SCR - B3E- cell D5		

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SCR - B3E- cell E5		
SCR - B3E- cell F5		
SCR - B3E- cell A6		
SCR - B3E- cell A6A		
SCR - B3E- cell B6		
SCR - B3E- cell C6		
SCR - B3E- cell D6		
SCR - B3E- cell E6		
SCR - B3E- cell F6		
SCR - B3E- cell A7		
SCR - B3E- cell A7A		
SCR - B3E- cell B7		
SCR - B3E- cell C7		
SCR - B3E- cell D7		
SCR - B3E- cell E7		
SCR - B3E- cell F7		
SCR - B3E- cell A8		
SCR - B3E- cell A8A		
SCR - B3E- cell B8		
SCR - B3E- cell C8		
SCR - B3E- cell D8		
SCR - B3E- cell E8		
SCR - B3E- cell F8		
SCR - B3E- cell A9		
SCR - B3E- cell A9A		
SCR - B3E- cell B9		

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SCR - B3E- cell C9		
SCR - B3E- cell D9		
SCR - B3E- cell E9		
SCR - B3E- cell F9		
SCR - B3E- cell A10		
SCR - B3E- cell A10A		
SCR - B3E- cell B10		
SCR - B3E- cell C10		
SCR - B3E- cell D10		
SCR - B3E- cell E10		
SCR - B3E- cell F10		
SCR - B3E- cell A11		
SCR - B3E- cell A11A		
SCR - B3E- cell B11		
SCR - B3E- cell C11		
SCR - B3E- cell D11		
SCR - B3E- cell E11		
SCR - B3E- cell F11		
SCR - B3E- cell A12		
SCR - B3E- cell A12A		
SCR - B3E- cell B12		
SCR - B3E- cell C12		
SCR - B3E- cell D12		
SCR - B3E- cell E12		
SCR - B3E- cell F12		
SCR - B3E- cell A13		

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SCR - B3E- cell A14		
SCR - B3E- cell A15		
SCR - B3E- cell A15A		
SCR - B3E- cell B15		
SCR - B3E- cell B15A		
SCR - B3E- cell C15		
SCR - B3E- cell A16		
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		

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A17		
SCR - B3F- cell Summary C17		
SCR - B3F- cell Summary A26		
SCR - B3F- cell Summary C26		
SCR - B3F- cell Summary A27		
SCR - B3F- cell Summary C27		
SCR - B3F- cell Windstorm A1		
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		
SCR - B3F- cell Windstorm B2		
SCR - B3F- cell Windstorm C2		
SCR - B3F- cell Windstorm		

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E2		
SCR - B3F- cell Windstorm F2		
SCR - B3F- cell Windstorm G2		
SCR - B3F- cell Windstorm H2		
SCR - B3F- cell Windstorm A3		
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		
SCR - B3F- cell Windstorm B20		
SCR - B3F- cell Windstorm C20		
SCR - B3F- cell Windstorm E20		
SCR - B3F- cell Windstorm F20		
SCR - B3F- cell Windstorm		

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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		
SCR - B3F- cell Earthquake B1		
SCR - B3F- cell Earthquake C1		
SCR - B3F- cell Earthquake E1		
SCR - B3F- cell Earthquake F1		
SCR - B3F- cell Earthquake G1		
SCR - B3F- cell Earthquake A2		
SCR - B3F- cell Earthquake		

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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		
SCR - B3F- cell Earthquake B3		
SCR - B3F- cell Earthquake C3		
SCR - B3F- cell Earthquake E3		
SCR - B3F- cell Earthquake F3		
SCR - B3F- cell Earthquake G3		
SCR - B3F- cell Earthquake A20		
SCR - B3F- cell Earthquake B20		
SCR - B3F- cell Earthquake C20		
SCR - B3F- cell Earthquake E20		
SCR - B3F- cell Earthquake F20		
SCR - B3F- cell Earthquake		

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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		
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		
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		

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SCR - B3F- cell Flood H2		
SCR - B3F- cell Flood A3		
SCR - B3F- cell Flood B3		
SCR - B3F- cell Flood C3		
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		
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		
SCR - B3F- cell Hail A1		
SCR - B3F- cell Hail B1		
SCR - B3F- cell Hail C1		
SCR - B3F- cell Hail E1		

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SCR - B3F- cell Hail F1		
SCR - B3F- cell Hail G1		
SCR - B3F- cell Hail H1		
SCR - B3F- cell Hail A2		
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		
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		
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		

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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		
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-		

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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		
SCR - B3F- cell Marine Tanker Collision B1		
SCR - B3F- cell Marine Tanker Collision C1		
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		

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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		
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		

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SCR - B3F- cell Aviation B1		
SCR - B3F- cell Aviation A2		
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		
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		
SCR - B3F- cell Liability B4		
SCR - B3F- cell Liability C4		

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SCR - B3F- cell Liability D4		
SCR - B3F- cell Liability E4		
SCR - B3F- cell Liability A1		
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		
SCR - B3F- cell Liability B8		
SCR - B3F- cell Liability C8		
SCR - B3F- cell Liability D8		
SCR - B3F- cell Liability E8		
SCR - B3F- cell Liability A9		
SCR - B3F- cell Liability B9		
SCR - B3F- cell Liability C9		
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		

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SCR - B3F- cell Liability D10		
SCR - B3F- cell Liability E10		
SCR - B3F- cell Liability A12		
SCR - B3F- cell Liability B12		
SCR - B3F- cell Liability C12		
SCR - B3F- cell Liability D12		
SCR - B3F- cell Liability E12		
SCR - B3F- cell Liability H12		
SCR - B3F- cell Liability A14		
SCR - B3F- cell Liability B14		
SCR - B3F- cell Liability C14		
SCR - B3F- cell Liability 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		

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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 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-		

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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		
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		

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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 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		

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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		
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		

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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 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		

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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		
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		

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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 Concentration Accident E3		
SCR - B3F- cell Concentration Accident F3		
SCR - B3F- cell Concentration Accident G3		
SCR - B3F- cell Concentration Accident H3		
SCR - B3F- cell		

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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		
SCR - B3F- cell Pandemic B1		
SCR - B3F- cell Pandemic C1		
SCR - B3F- cell Pandemic D1		
SCR - B3F- cell Pandemic		

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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 F2		
SCR - B3F- cell Pandemic A20		
SCR - B3F- cell Pandemic B20		
SCR - B3F- cell Pandemic		

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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		
SCR - B3G- cell A2		
SCR - B3G- cell A3		
SCR - B3G- cell A4		
SCR - B3G- cell A5		

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SCR - B3G- cell A6	The LOG implies that cells A6 and A9 should have different signs. This is not correct. Cell A9 should be positive	
SCR - B3G- cell A7		
SCR - B3G- cell A8		
SCR - B3G- cell A9	The LOG implies that cells A6 and A9 should have different signs. This is not correct. Cell A9 should be positive	
SCR - B3G- cell A10		
SCR - B3G- cell A11		
SCR - B3G- cell A12		
SCR - B3G- cell A13		
SCR - B3G- cell A14		
SCR - B3G- cell A15	It is not clear what is meant by expenses. Does this include investment expenses, acquisition expenses and commission ?	
SCR - B3G- cell A16		
MCR - B4A & B4B – General		
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		

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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		
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		

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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	<p>Cell C23 should include a reference to health business in the label, otherwise the sum at risk will be excluded</p> <p>Cell 23 refers to a floor of zero in the LOG description. The wording should be clarified to say that the floor applies to each contract, not to the result of a global calculation. This is a different floor to that which applies to each of the net BELs shown.</p>	
MCR - B4A- cell A24		
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		

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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		
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		

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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		
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		

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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		
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		

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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		
MCR - B4B- cell C37		
MCR - B4B- cell B38		
MCR - B4B- cell C38		
MCR - B4B- cell B39		
MCR - B4B- cell C39		
Assets - D1- General	Why is property, plant and equipment held for own use included. These are not investments but are held for operational use in the business. This are not all recorded within the investment systems and so will have to be manually added to the template.	

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Assets - D1- Purpose		
Assets - D1- Benefits		
Assets - D1- Costs		
Assets - D1- Groups	It will be particularly onerous to produce this detailed template at a group level, especially for non-EEA insurers. This should be a solo template only. The Log states that the group version will be the holding company, non-EEA insurers and non-regulated companies only. Presumably this is to avoid the duplication of insurers giving the information in their solo templates and again at group level. What about mutual entities where the ultimate parent company is also an EEA insurer ?	
Assets - D1- Materiality		
Assets - D1- Disclosure	We support the proposal that this template is not publicly disclosed.	
Assets - D1- Frequency		
Assets – D1 – Quarterly Exemption	It is believed that this comment applies to D1Q. It is not helpful to have an exemption set by variable criteria as for those insurers near the boundary they will have to have the capability to produce the information and will have uncertainty over whether or not to produce it. It would be far better to have a fixed exemption level.	
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	Comments below for Assets – D1 – cell A8, also relate to Assets – D1 – cell A10 Assets – D1Q – cell A8	

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Assets – D1Q – cell A10
 Assets – D2O – cell A6
 Assets – D2O – cell A7
 Assets – D6 – cell A5
 Assets – D6 – cell A7
 Assets – D6 – cell A27
 Assets – D6 – cell A28

The Solvency II requirement is to have “Issuer/Counterparty” and their respective “Ultimate Parent” and an “Issuer code” to identify them by (specified in QRTs as Issuer Name, Issuer Group (Code), Counterparty ID and Counterparty Group (Code)).

- Solvency II reporting represents the first occasion when Issuer data is included in industry-wide (cross-organisation, cross-jurisdiction) regulatory reporting. Currently each firm manages the data on a micro/silo basis using one of four data vendors. As a result there are differences and inconsistencies that have not been exposed previously
- Issuer information must be consistent across all Solvency II reporting from all firms and all countries because otherwise any analysis of systemic risk, at an aggregate level, would not be accurate and the data differences could not be detected easily.
- The challenge is that the existing Issuer data vendor sources produce different results for issuer and ultimate parent data for the same securities. This means that firms may generate different Solvency II reporting results for the same security unless the different data vendor sources converge fully to become 100% consistent before the January 2014 live date.
- The error rate, based on a sample of 22 held securities in two very large holding companies, ranged between 5% and 18% for Issuer data and between 9% and 41% for Ultimate Parent data. We believe these differences could result in material differences to Solvency II reports and results.
- Initial analysis indicates that although the data vendors have quite different structures and sources, most of the data content consistency required for Issuer and Ultimate Parent data could be achieved through more rigorous and consistent data cleansing (by the data vendors) as opposed to structural changes.
- The LEI (Legal Entity Identifier) that is being delivered via Dodd Frank could serve to

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	<p>engender some convergence of issuer data between vendors over time however the definition of the hierarchy linkage between issuer and ultimate parent is unlikely to be in scope.</p> <ul style="list-style-type: none"> The link between Pillar 3 and Pillar 1 also needs to be considered given that stock selection (Pillar 1) is likely to be based on front office data sources which could be sourced from a different vendor. <p>Proposal:</p> <ul style="list-style-type: none"> A consistent quality standard for Issuer data needs to be stipulated for Solvency II in order to meet the data quality requirements of completeness, accuracy and appropriateness. It will be necessary for all existing data vendors to provide data content that is identical and standardised in order to become Solvency II compliant. 	
Assets - D1- cell A9		
Assets - D1- cell A10	<p>The issuer group is not always readily available. It is not a data item that is currently supplied by the asset data vendors. It is not clear how this could be obtained for every asset.</p> <p>In addition, it is not at all clear, how consistency will be achieved as different information providers seem to use different codes.</p>	
Assets - D1- cell A11	This is presumably the issuer rather than the issuer group ?	
Assets - D1- cell A12		
Assets - D1- cell A13		
Assets - D1- cell A15	<p>Comments below for Assets – D1 – cell A15, also relate to</p> <p>Assets D1Q – A15 Assets – D20 – cell A11 Assets – D6 – cell A12</p> <p>Within Solvency II guidelines it is clear that a consistent CIC code is required for every asset for both pillar 1 and pillar 3. For example accurate cross-country analysis for EIOPA will only be possible using CIC codes if all assets are reported using the identical CIC code. In summary if the CIC is not consistent across the industry then information will be extremely challenging and require significant effort and judgement to accurately reconcile and aggregate.</p>	

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- An existing precedent is the CFI (Classification of Financial instruments - ISO 10962) which currently delivers different results because they are sourced from different numbering agencies that have made different interpretations. CIC uses a very similar formula to the CFI so the same inconsistency will be inevitable unless a single central global numbering agency can be appointed.
 - CIC code administration and assignment will be a much more complex task than for ISIN/Sedol/Valoren codes because the CIC requires detailed assessment of the type of instrument. There are likely to be different categories of CIC e.g.
 - o i) possible to assign centrally by numbering agency (market assets such as equity, bond, exchange traded derivatives and new CCPs for OTC derivatives);
 - o ii) might require additional information from Fund Manager to numbering agency (Collective Funds);
 - o iii) makes no sense to manage centrally (e.g. bi-lateral OTC derivatives, segregated funds)
- Proposal:
- EIOPA or The European Commission will need to create or appoint a numbering agent for CIC codes, and enforce the use of the identical code for all firms, if the CIC codes are to achieve the required results. A single global numbering agency will need to be appointed so that there are consistent CIC for each asset that can be distributed identically.
 - EIOPA should stipulate that the appointed numbering agent for CIC codes must maintain cross-referencing to ISIN codes, where they are available, to provide a means to deliver the accuracy and integrity within Solvency II data reporting systems.

Assets - D1- cell A16

Assets - D1- cell A17

Comments below for Assets – D1 – cell A17, also relate to
 Assets – D1 – cell A18
 Assets – D1Q – cell A18
 Assets – D1Q – cell A18
 Assets – D20 – cell A34

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	<p>Assets – D20 – cell A35</p> <p>The Credit Ratings requirement for Solvency II state: "An insurance or reinsurance undertaking shall nominate one or more ECAI (External Credit Assessment Institutions) to be used for the determination of the different parameters to derive the capital requirements of the various modules of the Solvency Capital Requirement (SCR) standard formula".</p> <p>There is a cost consideration because all organisations involved in the Solvency II data content process (Insurance firms, Fund Managers and Third Party Administrators) will each require licenses with the credit ratings supplier(s) used.</p> <p>The EIOPA guidance does not specifically state whether long term ratings (trend) or short term ratings (snapshot) should be used but since long term ratings are used much more commonly we believe they should apply.</p>	
Assets - D1- cell A18	See comment under Assets D1 – A17	
Assets - D1- cell A19		
Assets - D1- cell A20		
Assets - D1- cell A22		
Assets - D1- cell A23		
Assets - D1- cell A24	<p>Comments below for Assets – D1Q – cell A24, also relate to</p> <p>Assets – D1Q – cell A24</p> <p>Assets – D20 – cell A29</p> <p>Assets – D6 – cell A21</p> <p>When valuing assets under Solvency II it is necessary to specify whether a mark-to-market or a mark-to-model methodology has been used.</p> <p>Proposal</p> <p>The Solvency II definitions should be consistent with the IFRS / FASB definitions. The existing IFRS7/FASB157 level 1, level 2 and level 3 classifications for instrument pricing were introduced during the last three years as international accounting standards and are already in use</p>	

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	extensively for regulatory reporting for the Insurance industry.	
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	The Log states that the group version will be the holding company, non-EEA insurers and non-regulated companies only. Presumably this is to avoid the duplication of insurers giving the information in their solo templates and again at group level. What about mutual entities where the ultimate parent company is also an EEA insurer ?	
Assets - D1Q- Materiality		
Assets - D1Q- Disclosure		
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)	See comment under Assets –D1 – A8	
Assets - D1Q- cell A9 (list)		

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Assets - D1Q- cell A10 (list)	See comment under Assets –D1 – A8	
Assets - D1Q- cell A12 (list)		
Assets - D1Q- cell A13 (list)		
Assets - D1Q- cell A14 (list)		
Assets - D1Q- cell A15 (list)	See comment under Assets – D1 – A15	
Assets - D1Q- cell A16 (list)		
Assets - D1Q- cell A17 (list)	See comment under Assets D1 – A17	
Assets - D1Q- cell A18 (list)	See comment under Assets D1 – A17	
Assets - D1Q- cell A20 (list)		
Assets - D1Q- cell A22 (list)		
Assets - D1Q- cell A24 (list)	See comment under Assets D1 – A24	
Assets - D1Q- cell A25 (list)		
Assets - D1Q- cell A28 (list)		
Assets - D1Q- cell A30 (list)		
Assets - D1Q- cell A3		
Assets - D1Q- cell A5		
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		

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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		
Assets - D1S- Groups	The Log states that the group version will be the holding company, non-EEA insurers and non-regulated companies only. Presumably this is to avoid the duplication of insurers giving the information in their solo templates and again at group level. What about mutual entities where the ultimate parent company is also an EEA insurer ?	
Assets - D1S- Materiality		
Assets - D1S- Disclosure		
Assets - D1S- Frequency		
Assets - D1S- cell A1		
Assets - D1S- cell A2		
Assets - D1S- cell A3		

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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		
Assets – D20- Purpose		
Assets – D20- Benefits		
Assets – D20- Costs		
Assets – D20- Groups	The Log states that the group version will be the holding company, non-EEA insurers and non-regulated companies only. Presumably this is to avoid the duplication of insurers giving the information in their solo templates and again at group level. What about mutual entities where the ultimate parent company is also an EEA insurer ?	
Assets – D20- Materiality		
Assets – D20- Disclosure		
Assets – D20- Frequency		
Assets – D20 – Quarterly Exemption		
Assets - D20- cell A1		

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Assets - D20- cell A2		
Assets - D20- cell A3		
Assets - D20- cell A4		
Assets - D20- cell A5		
Assets - D20- cell A6	See comment under Assets –D1 – A8	
Assets - D20- cell A7	See comment under Assets –D1 – A8 The group to which the counterparty belongs may not be readily available. The parent undertaking is not a data item currently provided by asset data providers. In addition, it is not at all clear, how consistency will be achieved as different information providers seem to use different codes.	
Assets - D20- cell A8		
Assets - D20- cell A9	Clarification is needed on what is required here. For example if the derivative is an equity index option such as FTSE 100 option. What would the underlying asset be shown as ?	
Assets - D20- cell A10		
Assets - D20- cell A11	See comment under Assets – D1 – A15	
Assets - D20- cell A13		
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		
Assets - D20- cell A25		

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Assets - D20- cell A26		
Assets - D20- cell A27		
Assets - D20- cell A28		
Assets - D20- cell A29	See comment under Assets D1 – A24	
Assets - D20- cell A31		
Assets - D20- cell A32		
Assets - D20- cell A33		
Assets - D20- cell A34	See comment under Assets D1 – A17	
Assets - D20- cell A35	See comment under Assets D1 – A17	
Assets - D2T- General	This template requires details of derivative transactions that are closed during the period. Information is not currently held on closed transactions. There will be considerable cost in setting up and maintaining this information.	
Assets - D2T- Purpose		
Assets - D2T- Benefits		
Assets - D2T- Costs	See comments under general above.	
Assets - D2T- Groups		
Assets - D2T- Materiality	There should be a materiality exemption so that this template is only required where derivatives form a significant part of an insurer's portfolio.	
Assets - D2T- Disclosure		
Assets - D2T- Frequency		
Assets - D2T- Quarterly Exemption		
Assets - D2T- cell A1		
Assets - D2T- cell A2		
Assets - D2T- cell A3		

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Assets - D2T- cell A4		
Assets - D2T- cell A5		
Assets - D2T- cell A6	See comment under Assets –D1 – A8	
Assets - D2T- cell A7	See comment under Assets –D1 – A8 The group that the counterparty belongs to may not be available (see previous comments).	
Assets - D2T- cell A8		
Assets - D2T- cell A9		
Assets - D2T- cell A10		
Assets - D2T- cell A11	See comment under Assets – D1 – A15	
Assets - D2T- cell A13		
Assets - D2T- cell A14	Why is the delta relevant to a closed derivative ? We can see why it might be useful to assess the risk in an open contract but this is not relevant to a closed contract.	
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	Is this information necessary/relevant to closed transactions ?	
Assets - D2T- cell A22	Is this information necessary/relevant to closed transactions ?	
Assets - D2T- cell A23	Is this information necessary/relevant to closed transactions ?	
Assets - D2T- cell A24		
Assets - D2T- cell A25		
Assets - D2T- cell A26	Is this information necessary/relevant to closed transactions ?	
Assets - D2T- cell A27		
Assets - D2T- cell A28	Is this information necessary/relevant to closed transactions ?	

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Assets - D2T- cell A30		
Assets - D2T- cell A31	Is this information necessary/relevant to closed transactions ?	
Assets - D2T- cell A32	Is this information necessary/relevant to closed transactions ?	
Assets - D2T- cell A34	See comment under Assets D1 – A17	
Assets - D2T- cell A35	See comment under Assets D1 – A17	
Assets – D3- General	This template requires interest, dividends and rent on a received basis. This should be on an accruals basis. The accruals basis is how they are recorded in the underlying systems. The accruals basis also gives a true picture of the income arising in the period.	
Assets – D3- Purpose		
Assets – D3- Benefits		
Assets – D3- Costs		
Assets – D3- Groups	The Log states that the group version will be the holding company, non-EEA insurers and non-regulated companies only. Presumably this is to avoid the duplication of insurers giving the information in their solo templates and again at group level. What about mutual entities where the ultimate parent company is also an EEA insurer ?	
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	The log states that this is the income received in the period. This should be on an accruals basis ; not on a cash received basis.	
Assets - D3- cell A7	The log states that this is the income received in the period. This should be on an accruals basis ; not on a cash received basis.	
Assets - D3- cell A8	The log states that this is the income received in the period. This should be on an accruals basis ;	

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	not on a cash received basis.	
Assets - D3- cell A15	Why are only gains and losses from assets sold during the year included ? Wouldn't it be more useful to have all the gains arising in the year ? To produce the gain compared to the opening SII valuation will require system development as gains are not currently recorded in this way.	
Assets – D4- General	This template will be extremely difficult and expensive to complete. More importantly it is not at all clear that the information will be available at all. It can only be done if the investment managers can/are willing provide the information. Our understanding is that there is considerable resistance within the investment management industry as much of this information is considered to be commercially sensitive. A better approach may be to categorise funds using an estimated method such as using investment benchmarks for the fund.	
Assets – D4- Purpose		
Assets – D4- Benefits		
Assets – D4- Costs	See comments under 'general' above.	
Assets – D4- Groups	The Log states that the group version will be the holding company, non-EEA insurers and non-regulated companies only. Presumably this is to avoid the duplication of insurers giving the information in their solo templates and again at group level. What about mutual entities where the ultimate parent company is also an EEA insurer ?	
Assets – D4- Materiality		
Assets – D4- Disclosure		
Assets – D4- Frequency		
Assets – D4 – Quarterly Exemption		
Assets - D4- cell A1	Comments below for Assets – D4 – cell A1, also relate to Assets – D4 – cell A2 Assets – D4 – cell A3	

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Assets – D4 – cell A4
Assets – D4 – cell A5
Assets – D4 – cell A6
Assets – D4 – cell A7
Assets – D4 – cell A8

Under Solvency II, look-through data is required to be provided by the insurance firm to regulators quarterly (5 weeks after quarter end) and annually (14 weeks after year end) as follows:

“Indicate which level of look-through has been used for a given fund :

- Standard (S): by main asset categories, main geographical zones and currency (local or foreign). For funds of funds, to perform as many iterations as necessary to ensure that all material risk is captured;
- Mandate (M): for collective investment schemes that are not sufficiently transparent, to use the mandate as a reference;
- Other (O): otherwise, split using the “global equity” (if fund invests only in EEA or OECD) or the “other equity” as prescribed under the QIS 5 exercise.”

This gives rise to a number of challenges;

- Currently look through data is time delayed by several months and is distributed on a limited scale bi-laterally using templates.
- The source of the look-through data can be three or more administrative organisations ‘away’ from the insurance firm, for example funds holding collectives or pooled funds. The number of organisations involved in sourcing the look-through data, many of which will be far removed from the top level insurance firm.
- The fragmented source of look-through data puts the accuracy, completeness and appropriateness of the final compiled data set at risk.
- Investment managers do not provide look-through data for collective funds as it breaches

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	<p>their strict disclosure rules; Solvency II requires a significant cultural shift amongst investment managers.</p> <ul style="list-style-type: none"> Investment managers will need to provide (or permit provision of) details of all holdings and their weightings (not normally published other than top 10) and over-ride any privacy concerns. <p>Proposal</p> <ul style="list-style-type: none"> To address Investment manager concerns relating to disclosure of look-through data for collectives, the insurance firm (or elected TPA) could aggregate holdings by CIC across all assets for Pillar 3 reporting. For Pillar 1 for some (but not necessarily all) firms the full transparency of look through constituents and holdings is likely to still be necessary. To address concerns relating to obtaining look-through data in a timely manner, consider the use of a proxy, such as the benchmark for a collective (relevant to public indexes for non synthetic funds), in the case of the holding in the collective not being material to the insurance firm’s overall assets (consistent with the Mandate method). For Solvency II purposes this information will need industrial scale and systematic (but tightly controlled) dissemination using data vendor solutions. Centrally vended solutions will need to be created from scratch because no such service is available at present. 	
Assets - D4- cell A2	See comments under Assets - D4 - A1	
Assets - D4- cell A3	See comments under Assets - D4 - A1	
Assets - D4- cell A4	See comments under Assets - D4 - A1	
Assets - D4- cell A5	See comments under Assets - D4 - A1	
Assets - D4- cell A6	See comments under Assets - D4 - A1	
Assets - D4- cell A7	See comments under Assets - D4 - A1	
Assets - D4- cell A8	See comments under Assets - D4 - A1	

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Assets – D5- General	The template requires all transactions in the period to be reported not just those open at the period end. This will require a significant amount of additional data to be recorded which is not currently available.	
Assets – D5- Purpose		
Assets – D5- Benefits		
Assets – D5- Costs		
Assets – D5- Groups	The Log states that the group version will be the holding company, non-EEA insurers and non-regulated companies only. Presumably this is to avoid the duplication of insurers giving the information in their solo templates and again at group level. What about mutual entities where the ultimate parent company is also an EEA insurer ?	
Assets – D5- Materiality		
Assets – D5- Disclosure		
Assets – D5- Frequency		
Assets - D5- cell A1	<p>Comments below for Assets – D5 – cell A1, also relate to the full datasheet</p> <ul style="list-style-type: none"> Assets – D5 – cell A2 Assets – D5 – cell A3 Assets – D5 – cell A4 Assets – D5 – cell A5 Assets – D5 – cell A6 Assets – D5 – cell A7 Assets – D5 – cell A8 Assets – D5 – cell A9 Assets – D5 – cell A10 Assets – D5 – cell A11 Assets – D5 – cell A12 Assets – D5 – cell A13 Assets – D5 – cell A14 	

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The Solvency II requirement to report on all loan and collateral positions within the reporting period, rather than at period end, will generate a potentially unmanageable quantity of data items per day. Positional reporting at period end only would generate significantly less data whilst still meeting the required regulatory objectives.

The reporting templates for securities lending activity also include repo transactions and whilst these two transaction types share attributes they are structurally fundamentally different. Whilst the current templates are appropriate for repo transactions they are not adaptable for accurately recording securities lending activity in the same way.

Proposal:

Stock Lending Data to be reporting at period end only

QRT requirements to be amended/clarified.

- 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		
Assets - D6- Purpose		
Assets - D6- Benefits		
Assets - D6- Costs		
Assets - D6- Groups	The Log states that the group version will be the holding company, non-EEA insurers and non-regulated companies only. Presumably this is to avoid the duplication of insurers giving the information in their solo templates and again at group level. What about mutual entities where the ultimate parent company is also an EEA insurer ?	
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	See comment under Assets –D1 – A8	
Assets - D6- cell A6		
Assets - D6- cell A7	See comment under Assets –D1 – A8 The issuer group is not readily available data.	
Assets - D6- cell A8		
Assets - D6- cell A9		
Assets - D6- cell A10		
Assets - D6- cell A12	See comment under Assets – D1 – A15	
Assets - D6- cell A19		
Assets - D6- cell A20		

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Assets - D6- cell A21	See comment under Assets D1 – A24	
Assets - D6- cell A22		
Assets - D6- cell A24		
Assets - D6- cell A25		
Assets - D6- cell A26		
Assets - D6- cell A27	See comment under Assets –D1 – A8	
Assets - D6- cell A28	See comment under Assets –D1 – A8	
TP - F1 & F1Q- General	We welcome the simplifications that have been made to this template. TP-F1 has to be disclosed for RFFs. It is not clear whether a total form has to be produced as well. Would seem sensible for reconciliation purposes as other templates are not broken down in the same fashion.	
TP - F1 & F1Q - Purpose		
TP - F1 & F1Q - Benefits		
TP - F1 & F1Q - Costs		
TP - F1 & F1Q - Groups	We support the change to make this a solo only template	
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		

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TP - F1- cells B4-C1		
TP - F1- cells BA1 – BA13		
TP - F1- cell BB1		
TP - F1- cell BB10		
TP - F1- cell BB13		
TP - F1- cells BC1 – BC13		
TP - F1- cells BD1 – BD13		
TP - F1- cells BF1 – BF13		
TP - F1- cells CB1 – CB14A		
TP - F1- cells CC1 – CC14		
TP - F1- cells CD1 – CD14A		
TP - F1- cells C1 – C14A		
TP - F1- cells CB9A – C9A		
TP - F1- cells E1 – E13		
TP - F1- cells FB7A		
TP - F1- cells FB7B		
TP - F1- cells FB7C		
TP - F1- cells IA1 – IA 13	This row requires us to provide technical provisions for contracts with a surrender option. However, there is now nothing to compare this against as the requirement to disclose the surrender value in force at the valuation date has been removed from this form as relocated to TP-F3. Line IA should also be removed. Alternatively, update to BEL rather than risk margin.	
TP - F1- cells J1 – JL13		
TP - F1- cells M1-M13	Where simplifications are used to produce a BEL (e.g. mainly manual reserves or for small lines of business). How should these be disclosed?	
TP - F1- cells N1-N13		

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TP - F1- cells O1-O13		
TP - F1- cells P1-P13	The log requires 'claims paid'. This should be on an accruals basis as recorded for accounts and not on a cash basis as implied by the word 'paid'.	
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>There is now a statement that the form does not have to reconcile with Tp-F1 and hence central scenarios can be used to populate the form. This is a welcome simplification which we fully support.</p> <p>There should be a clear indication whether "liabilities calculated as a whole" are to be included or excluded from the form.</p>	
TP - F2- Purpose		
TP - F2- Benefits		
TP - F2- Costs		
TP - F2- Groups	We support the change to make this a solo only template	
TP - F2- Materiality	There is no materiality threshold to this form. This is not helpful. In excess of 95% of the	

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	cashflows will come from the models. However, more time will be spent producing cashflows for the manual (or other out of model) reserves. These will not have a material impact on the content of the form. One can argue that we need cashflows to produce a BEL but we will probably use simplifications which would not necessarily result in cashflows being produced.	
TP – F2- Disclosure		
TP – F2- Frequency		
TP – F2- cells A1-A34		
TP – F2- cells C1 – C35		
TP -F2- cells D1-D35		
TP -F2- cells F1-F35		
TP -F2- cells AU1 –AU35		
TP -F2- cells CU1 – CU35		
TP -F2- cells DU1 – DU35		
TP -F2- cells FU1 – FU35		
TP -F2- cells I1 –I35		
TP -F2- cells J1 –J35		
TP -F2- cells K1 –K35		
TP -F2- cells L1 –L35		
TP -F2- cells M1 –M35		
TP -F2- cells N1 –N35		
TP -F2- cells O1 –O35		
TP -F2- cells P1-P35		
TP -F2- cells Q1 –Q35		
TP -F2- cells R1 –R35		
TP -F2- cells S1 –S35		

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TP -F2- cells T1 –T35		
TP -F2- cells U1 – U35		
TP -F2- cells CH1 –CH35		
TP -F2- cells DH1 –DH35		
TP -F2- cells FH1 –FH35		
TP -F2- cells V1 –V35		
TP -F2- cells X1 – X35		
TP -F2- cells Y1-Y35		
TP -F2- cells Z1- Z35		
TP -F2- cells GH1 –GH35		
	This template requires the matching of accounting data (premiums) with actuarial data (technical provisions). This is required at a far greater level of detail than is currently performed. It will require significant system changes to obtain premiums at the required level of granularity. To present each product separately and in addition some products split by risk characteristics will produce a large number of lines. The emplate should be simplified, at least removing A15.	
TP – F3- General		
TP – F3- Purpose		
TP – F3- Benefits		
TP – F3- Costs	To produce premiums to the required level of granualrity will be extremely onerous, requiring us to make changes to policy admin feeds to the finance systems for virtually every admin system in the group. Our initial estimate is that this will involve a one-off cost in excess of £1m.	
TP – F3- Groups		
TP – F3- Materiality	The lack of a materiality threshold will lead to excessive disclosure and detail on this template.	
TP – F3- Disclosure		
TP – F3- Frequency		
TP - F3- cell A1	It would appear from the Log that a single product could be included in several lines depending on	

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	<p>its characteristics. This will be very onerous to do in practice and will lead to very detailed and extensive disclosures. It is recommended that if product level information is required, that each product should be included in one line only.</p>	
TP - F3- cell A2A		
TP - F3- cell A2B	A2B and A2C – we are having difficulty understanding what is required here. Are we supposed to produce a list of product characteristics (rather like the FSA product code list) which we use here or something else? Further guidance is required here	
TP - F3- cell A2C	See comment in A2B above	
TP - F3- cell A3		
TP - F3- cell A4		
TP - F3- cell A5		
TP - F3- cell A6	<p>The implication from the Log is that one product could be in several lines each with a different product classification ID. For example if a product is sold on either a single life or a joint life basis, the two versions of the product would be shown separately. Is this interpretation correct ? If so, this will be very onerous to do, requiring extensive system changes.</p> <p>For some products it will not be possible to split the accounting premiums by risk type, because the premium is written and recorded by the policy admin system as a single premium. For example some term assurance contracts with added critical illness. The term assurance benefit is risk 'Death', whereas the critical illness is risk 'Morbidity'. The product is priced as one contract and only one premium is recorded by the admin system, not one premium for each benefit. It is not therefore possible to split by risk type.</p> <p>The definition of the second letter in the code is not clear – especially for E (risk) and O (other).</p> <p>Now that cell A9 has been changed to be the number of contracts rather than the number of lives should the third letter of the ID code (single, joint, collective or other life) be deleted ?</p>	
TP - F3- cell A7	The phrase 'Combinations can be used for example on a pension policy'. This implies that if a product can accept either single or regular premiums, that it would be shown as a single line on	

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	the QRT and both premiums types would be included in cell A7. Is this correct ?	
TP - F3- cell A8		
TP - F3- cell A9	The reference to the IFRS definition of an insurance contract in this cell is strange. If only IFRS insurance contracts are included then a large number of contracts will be excluded, for example most unit linked savings contracts.	
TP - F3- cell A10		
TP - F3- cell A15	The definition of premiums should be that premiums are recognised in this cell on the same basis as they are included in the technical provisions (ie on an accruals basis).	
TP - F3- cell A21		
TP - F3- cell A24		
TP - F3- cell A26	We assume that this is surrender value in force on the valuation date. To confirm.	
TP - F3- cell A30	LOG mentions that this is not applicable to unit linked and “profit” business. Should be “non profit” business? For conventional with-profit business, this is likely to be difficult to populate as the historic information may not be available. For unitised with-profit business, this measure is not sensible and should be removed.	
TP - F3- cell A34A	The Log refers to a comparison with claims paid in cell A20. Cell A20 has been deleted. Should A34A also be deleted ? If not, what is its purpose ? If it is not deleted the Log should be updated to remove the reference to A20.	
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		

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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		
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		

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TP - F3B- cell A9		
TP - F3B- cell A10		
TP – F4- General		
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		
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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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		
TP -E1- cells A35-P35		
TP -E1- cells A36-P36		
TP -E1- cellss A37-P37		
TP -E1- cellss A38-P38		
TP -E1- cellss A39-P39		
TP -E1- cellss A40-P40		
TP -E1- cellss A41-L53		
TP - E1 Q- cells A1-R1		
TP - E1 Q- cells A2-R2		
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		
TP – E2- Purpose		
TP – E2- Benefits		
TP – E2- Costs		
TP – E2- Groups		
TP – E2- Materiality		

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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	<p>There needs to be some form of exemption or proportionality applied to non-life insurers in run-off where they are subsidiaries and cannot therefore take advantage of the wider exemption from SII that applies to stand-alone companies.</p> <p>For example we have a non-life insurance subsidiary which will have been in run-off for 13 years when SII goes live. This company is the combination of five separate non-life insurers. The claims from 15 years ago will bear no relation to the current position of the insurer and will be of no benefit to the supervisor.</p> <p>For companies in run off a maximum of five years of historical data should be provided.</p>	
TP - E3- Purpose		
TP - E3- Benefits		
TP - E3- Costs		
TP - E3- Groups		
TP - E3- Materiality		
TP - E3- Disclosure		
TP - E3- Frequency		
TP - E3- cells A00		
TP - E3- cells A01		

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TP - E3- cells A02		
TP - E3- cells A03: N		
TP - E3- cells A04		
TP - E3- cells A1-A15-J0		
TP - E3- cells A17-A31-J16		
TP - E3- cells A33-A47-J32		
TP - E3- cells P1-P15-J0	It will be very onerous to provide best estimate liabilities going back 15 years even on a best efforts basis. It would be more reasonable to include the liabilities on the Solvency I basis for years prior to the go-live of Solvency II.	
TP - E3- cells P33-P47-J32		
TP - E3- cells AE1-AE15-J0		
TP - E3- cells AE17-AE31-J0		
TP - E3- cells AE33-AE47-J0		
TP - E3- cells IH1-IE15B		
TP - E4- General		
TP - E4- Purpose		
TP - E4- Benefits		
TP - E4- Costs		
TP - E4- Groups		
TP - E4- Materiality		
TP - E4- Disclosure		
TP - E4- Frequency		
TP - E4- cells A1-A10		
TP - E4- cells B1-B10		

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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		
TP - E6- General		
TP - E6- Purpose		
TP - E6- Benefits		
TP - E6- Costs		
TP - E6- Groups		
TP - E6- Materiality		

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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		
TP – E7A- General		
TP – E7A- Purpose		
TP – E7A- Benefits		
TP – E7A- Costs		
TP – E7A- Groups		
TP – E7A- Materiality		
TP – E7A- Disclosure		
TP – E7A- Frequency		

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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		
TP – E7B- Purpose		
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		

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TP - E7B- cell B1		
TP - E7B- cell C1		
TP - E7B- cell D1		
TP - E7B- cell E1		
Re - J1- General		
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		
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		

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Re - J1- cell K1		
Re - J1- cell L1		
Re - J1- cell M1		
Re - J1- cell N1		
Re - J1- cell P1		
Re - J1- cell Q1		
Re - J1- cell W1		
Re - J1- cell Y1		
Re - J1- cell Z1		
Re - J1- cell AB1		
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		

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Re - J1- cell U11		
Re - J1- cell W11		
Re - J1- cell X11		
Re - J1- cell Z11		
Re - J1- cell AA11		
Re - J2- General	The LOG contains reference to cell AQ1 (estimated premium outgo in the year) but this has been deleted from the template	
Re - J2- Purpose		
Re - J2- Benefits		
Re - J2- Costs		
Re - J2- Groups		
Re - J2- Materiality	The lack of a materiality limit is onerous. There are a few reinsurance arrangements in place which are relatively small compared to the total of our reinsurance arrangements. We will have to disclose all of these under the current rules.	
Re - J2- Disclosure		
Re - J2- Frequency		
Re - J2- cell A1		
Re - J2- cell B1		
Re - J2- cell C1		
Re - J2- cell D1		
Re - J2- cell E1		
Re - J2- cell F1		
Re - J2- cell G1		
Re - J2- cell H1		

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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		
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		
Re - J2- cell AB1		
Re - J2- cell AC1		
Re - J2- cell AD1		
Re - J2- cell AE1		
Re - J2- cell AF1		
Re - J2- cell AG1		
Re - J2- cell AM1		

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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		
Re - J3- cell E1		
Re - J3- cell F1		
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		

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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		
SPV- cell F1A		
SPV- cell G1		
SPV- cell H1		
SPV- cell I1		
SPV- cell J1		
SPV- cell K1		

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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		
G01-Benefits		
G01-Costs		
G01-Application		
G01-Materiality		
G01-Disclosure		
G01-Frequency		
G01- cell A1		
G01- cell B1		
G01- cell C1		
G01- cell D1	The closed list does not include financial and credit institutions or other regulated entities. Would it not be useful information to have this? This will then tie in to the	

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	supervisory authority info in cell G1.	
G01- cell E1		
G01- cell F1		
G01- cell G1		
G01- cell H1	What is meant by the 'total amount of the balance sheet'? Is this net assets or gross assets (ie total assets)? If the parent is included on the form, then there will be a double count as the parent entity includes its participation in the group entities.	
G01- cell I1		
G01- cell J1	What is meant by underwriting performance for a life insurer?	
G01- cell K1	The log comment seems to be a copy of J1. A definition of what is meant by investment performance would be helpful. Are these the values per the IFRS/local GAAP accounts?	
G01- cell L1	A definition of total performance would be helpful. For example is the profit before tax. Are these the values per the IFRS/local GAAP accounts?	
G01- cell M1		
G01- cell N1	The consolidation or not of an entity under IFRS is more complex than a simple % (although in practice 50% is often used as a benchmark). What values does this cell add?	
G01- cell O1		
G01- cell P1		
G01- cell Q1		
G01- cell R1		
G01- cell S1		
G01- cell T1		
G01- cell U1		
G01- cell V1		
G03 & G04-Purpose	Cells Q1 and R1 are referred to on the log, but not longer included on the template, can we	

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	assume they are no longer required	
G03 & G04-Benefits		
G03 & G04-Costs		
G03 & G04-Application		
G03 & G04-Materiality		
G03 & G04-Disclosure		
G03 & G04-Frequency		
G03- cell A1	This comment relates to A2-unique identification code, presumably this is the regulatory company number, e.g. the FSA registered number for UK insurers?	
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		
G03- cell L1		
G03- cell M1		
G03- cell N1		
G03- cell O1		
G03- cell P1		
G04- cell A1		

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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		
G14- cell N1		

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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		
IGT1 to IGT4-Disclosure		

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IGT1 to IGT4-Frequency		
IGT1- cell B6		
IGT1- cell C6		
IGT1- cell D6		
IGT1- cell E6		
IGT1- cell F6	It is not clear what code should be used for any entity that does not have an external code. What is meant by „authorisation number“ – is this the registered number of the company?	
IGT1- cell G6		
IGT1- cell H6		
IGT1- cell I6	The list of transactions includes equity – shares. If a participation is held at the beginning and end of the year, but does not move at all during the year, should this be included. If so then this template will include all participations at all levels of the group. We believe that this form should only include moveents in participations, eg new equity issued by a participation to its parent entity. The template includes guarantees. It is difficult to see how most of the cells on this template could be filled in for intra-group guarantees. These would be better included on IGT 4.	
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		

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IGT1- cell S6		
IGT2- cell B6		
IGT2- cell C6		
IGT2- cell D6		
IGT2- cell E6		
IGT2- cell F6		
IGT2- cell G6		
IGT2- cell H6		
IGT2- cell I6	The closed list includes contingent liabilities, but elsewhere it states that contingent liabilities are excluded from this template.	
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		

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IGT3- cell D6		
IGT3- cell D6		
IGT3- cell E6		
IGT3- cell F6		
IGT3- cell G6		
IGT3- cell H6		
IGT3- cell I6		
IGT3- cell J6		
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		
IGT4- cell N5		

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IGT4- cell O5		
IGT4- cell P5		
RC-Purpose		
RC-Benefits		
RC-Costs		
RC-Application		
RC-Materiality		
RC-Disclosure		
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		
RC- cell A14		
RC- cell A15		
RC- cell A16		
RC- cell A17		
RC- cell A18		

