

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19-Jun-13 12:00 CET
Name of Company:	RSA Insurance Group plc	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> - Do not change the numbering in the column “reference”; if you change numbering, your comment cannot be processed by our IT tool - Please do not insert or delete any row. If you have no comment on a paragraph or a cell, keep the row empty. - Leave the last column empty. - Please fill in your comment in the relevant row. - Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <ul style="list-style-type: none"> o Certain rows represent a group of cells with similar information (ex : TP-E1- cells A43-L43) o If your comment refers to multiple cells or paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other cells or paragraphs this also applies. o If your comment refers to subparagraphs or specific cells within a group, please indicate this in the comment itself. <p>Please send the completed template, in Word Format, to CP-13-010@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 Technical Annexes II and III.</p>		
Reference	Comment	Resolution
General Comments	<p>We support this effort by EIOPA to prevent individual national supervisors from introducing parts of the Solvency II legislation piecemeal and in a way which introduces unnecessary differences between jurisdictions.</p> <p>We are, however, opposed to any early introduction of regulatory reporting. This would inevitably be in addition to existing Solvency I reporting, so would involve double reporting and additional costs for firms.</p> <p>In any event, the volume of reporting that EIOPA is proposing is excessive, particularly for internal model firms where forms intended only for companies using standard formula under EIOPA's stabilised QRT package are also within scope.</p> <p>It is unhelpful for the guidelines to replicate (with different wording) the provisions contained in the draft Level 2 text; it would be better for the guidelines to reference the October 2011 draft of the level 2 rules. Whilst the eventual wording of such texts are dependent on the outcome of Omnibus II negotiations, such negotiations will very likely result in the detail of these proposals being altered anyway. In any event, the</p>	

	<p>guidelines ought not to prescribe any requirements which go beyond the draft Level 2 text.</p> <p>If the purpose of these Guidelines is to enable early preparation, then they ought to apply to all insurance and reinsurance companies within the scope of Solvency II. We consider it unfair that certain undertakings would be exempted from some of the requirements and oppose the proposed use of thresholds. In any case, we believe that such thresholds go against the principles of the single market, by creating an uneven playing field for firms.</p> <p>Whilst this is mentioned by EIOPA, we wish to stress the importance of not basing any supervisory enforcement action on the outcome of the Guidelines. Since the intention is not early implementation, it is important that any reporting is not used to provide comparative information for any reporting submissions made after the Solvency II go-live date: for instance, assuming day-one reporting is required as at 1/1/2016, comparative information as at 31/12/2014 ought not to be taken from any reporting produced as at that date under these Guidelines.</p> <p>It is also important to consider that the proposed ECB requirements apply only to Euro-area member states; whereas these preparatory Guidelines apply to NCAs in the whole Union. We do not believe it is appropriate for SII policy to be formulated based on developments that do not affect all member states.</p> <p>Our comments are on the basis that the guidelines are being put in place as preparation for the implementation of Solvency II (as stated in paragraph 1.6), rather than actual implementation; and that what is required is for undertakings “to progress in their preparedness for Solvency II over time during the course of the preparatory phase” (as stated in paragraph 4.3 of the Cover note for the Consultation on Guidelines on preparing for Solvency II), rather than to achieve full compliance ahead of the implementation date.</p>	
<p>Introduction General Comments</p>	<p>It is important to consider that, as currently proposed, there will be “day-1” reporting as at 1/1/16. Should this proceed as proposed, undertakings will have to report the following in early 2016, all with the same balance sheet date:</p> <ul style="list-style-type: none"> • Q4 2015 SII numbers under these proposed interim Guidelines; • day-1 reporting; • Solvency I returns; and • statutory annual accounts. <p>We disagree with the proposals for day-1 reporting. The proposals for Q4 2015 interim reporting ought therefore to be contingent upon the eventual outcome of this matter: if there is to be day-1 reporting, Q4</p>	

	<p>2015 reporting ought to be reduced accordingly (there would otherwise be a direct overlap); if there is to be no day-1 reporting, the Q4 2015 submission may be prepared unhindered.</p> <p>The short length of time that would exist between publication by EIOPA of its Technical Specification in Q2 2014 and the first set of interim reporting as at 31 December 2014, leaves firms with insufficient preparation time. We believe there ought to be no interim reporting as at this date.</p>	
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1.11	<p>We welcome the inclusion of this revision clause; however, it is not clear what would happen if, as is possible, the approval of OMDII does not happen as hoped to facilitate Solvency II implementation on 1 January 2016. EIOPA refers to a “review”, but we should like it to be made explicitly clear that any OMDII delay will result in a corresponding delay to the preparatory-phase reporting submission dates. Should such a delay to early reporting not occur, there would be a real risk of increased costs on firms as they attempt to report using rules that might still change.</p> <p>We are concerned about the short length of time that would exist between the foreseen publication of EIOPA’s Technical Specifications in Q2 2014 (assuming OMDII is approved) and the first set of reporting under these Guidelines as at 31 December 2014. There would appear to be little time for firms to prepare. We therefore believe EIOPA ought to reconsider the need for interim reporting for year-end 2014.</p>	
1.12		
1.13	<p>Although firms applying for internal model approval do indeed have to provide data relating to both their models and the standard formula, they will not necessarily be geared up to report standard formula data using the specific templates. As a group that has actually undertaken a number of dry-run exercises with the QRTs, we can say with certainty that preparing systems etc to populate such templates when good progress is being made with the internal model application process would be an extra and unnecessary burden.</p>	

	<p>Further, the requirement to complete such templates goes against what has been set out in the stabilised package, i.e. that these QRTs (SCR-B3 series) are intended for standard formula firms only.</p> <p>If the intention of the Guidelines is early preparation, there is little benefit to be gained from asking firms to complete these. We note EIOPA’s argument that model approval will not have been given as at the time of implementing these Guidelines and that such approval may never be given, meaning firms will need to have contingency plans for operating on a standard formula basis. We believe our stance is justified based on the Guidelines EIOPA proposes regarding third-country equivalence: such equivalence may not eventually be granted in respect of certain countries, yet undertakings are not being asked to assume this and to report using the ‘best-case’ scenario whereby equivalence is granted. Similarly, internal model applicants ought to be able to report on the basis that their models will be approved.</p>	
1.14		
1.15	We support EIOPA’s proposal that the information to be reported be a subset of the full package, not the package in its entirety.	
1.16	We support EIOPA’s proposal that ring-fenced fund reporting be limited.	
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1.19	We support the proposal that D&A firms be allowed to assume that third-country equivalence will be approved and request EIOPA to apply this same principle to internal model reporting (see 1.13 above).	
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1.23	See 1.13 and 1.19 above – we believe this proposal is inconsistent with the proposal for third-country equivalence and places an unnecessary burden on internal model applicants; we ask EIOPA to reconsider.	
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Section I. General Comments		
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1.28	We note that the deadline for the first NCA report to EIOPA is before the deadline for the annual reporting submission.	
Section II. General	As EIOPA states in the Impact Assessment, the use of thresholds is proposed in order to pre-empt the	

Comments	introduction of proportionality in reporting and disclosure under OMDII. Given these Guidelines are not intended to come into force until after the approval of OMDII, it is well within EIOPA's capability to produce guidelines that apply to <u>all</u> firms that are within the scope of Pillar III reporting as per OMDII. This attempt by EIOPA to predict the OMDII outcome will result in one of two possibilities: 1) some undertakings exempt under OMDII will be caught by these Guidelines; or 2) some undertakings caught by OMDII will be outside the proposed threshold, meaning they will not have had the opportunity to demonstrate progress towards SII compliance. EIOPA ought simply to refer to the OMDII thresholds (if any) when they are finalised.	
1.29	We believe the use of a threshold undermines the stated purpose of the phasing in ("to review and evaluate the quality of the information and the progress made" – paragraph 1.27(b)).	
1.30	See 1.29.	
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1.35	The national competent authorities ought to be able to notify affected undertakings now, as the determining criteria are based on 2012 figures. Waiting until Q2 2014 is too late.	
1.36	The lack of harmonisation resulting from the application of thresholds conflicts with the proposal for Group reporting: in order to procure data for the whole group, all operations in that group will have to provide data, no matter what their size. We believe the proposals regarding thresholds contradict the following aim: "to review and evaluate the quality of the information and the progress made" (paragraph 1.27).	
1.37	This needs to be rephrased to clarify that it refers to "the exchange rate prevailing as at the end of the reporting period "; what is currently stated could be misinterpreted as the rate prevailing as at the date of submission.	
1.38		
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1.40	See 1.35 – this notification ought to be made much earlier: the relevant data currently exist for this.	
1.41	See 1.36.	
1.42	See 1.37.	
1.43	See 1.35.	
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1.45	See 1.35.	

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1.47	See 1.13 and 1.23: we believe that QRTs B2A/B and B3A-B3G ought not to apply to internal model applicants.	
1.48	See 1.47.	
Section III. General Comments	The major objection we have to the proposed Guidelines in this section concerns the mooted requirement of internal model applicants to submit standard formula SCR data via the prescribed templates. To be clear: it is not that such firms are unable to produce such data, or that they are unable to provide such data to NCAs, as they already need to do both for the purposes of model approval. What is objectionable is that these firms will need to invest time, resource and IT cost to package the same data into these prescribed templates and report within stipulated deadlines that run parallel to existing commitments.	
1.49	Given EIOPA envisages the possibility of NCAs requesting additional information from internal model applicants using “specific templates”, there is no need for such undertakings to submit QRTs B2A/B and QRTs B3A-B3G – to do otherwise would result in an unnecessary, increased burden on undertakings for no benefit.	
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1.52		
1.53	See 1.13 and 1.23: we believe that QRTs B2A/B and QRTs B3A-B3G ought not to apply to internal model applicants.	
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1.55	See 1.47.	
1.56	See 1.49.	
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1.62	We propose part (d) be reworded to say, “...how the undertaking intends to fulfil its obligation...”: it is not possible to describe compliance with something that has yet to enter into force and that is therefore not an “obligation”.	
Section IV. General Comments	RSA Insurance Group plc, together with all of its entities that will be subject to SII, has undertaken a number of dry-run exercises on Pillar III reporting, including the production of mocked-up SFCRs and RSRs.	

	<p>Part of this exercise has involved the drafting of policies and procedures to suit anticipated Pillar II requirements, thereby contributing to the content of relevant Pillar III reporting and disclosure.</p> <p>If the purpose of these Guidelines is to assess progress towards achieving compliance with SII requirements, spending time and resource producing narrative that describes a temporary situation (temporary, because firms will be in the course of making progress towards achieving compliance) does not achieve anything other than bureaucracy. We believe that NCAs will be able to assess progress towards Pillar II compliance via the means set out in the Guidelines proposed for the System of Governance. We therefore do not believe the Guidelines proposed here for reporting are necessary.</p>	
1.63		
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1.65	By referring solely to Guidelines 20 to 24, this gives the impression that Guideline 26 does not apply to groups. We shall therefore assume this to be the case, unless EIOPA explicitly confirms otherwise.	
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1.67	See 1.65: we assume this Guideline does not apply to groups.	
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Section V. General Comments		
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Section VI. General Comments		
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1.78	Again, as the Guideline refers explicitly to solo undertakings only, we assume groups do not need to comply with it under these Guidelines.	
1.79	Unlike under a “real” Solvency II environment, undertakings will be required to report under the Guidelines in addition to existing Solvency I reporting. This additional burden ought to be reflected in an	

	extended submission deadline: at least two extra weeks.	
1.80		
Section VII. General Comments	EIOPA and NCAs need to allow for the fact that any policy or documented process might not be fully operational as at the time of implementing these Guidelines.	
1.81	This provision, though welcome, ought to be extended to narrative reporting as would be the case when the SFCR and RSR are submitted for real.	
Section VIII. General Comments	Given the overlapping with Solvency I reporting and other commitments, NCAs ought to be given the flexibility to apply the proposed deadlines as they think appropriate. In any case, we believe group-level narrative reporting ought to benefit from the 6 week extension set out in 1.81.	
1.82	See 1.81: groups ought to be given additional time for the narrative reporting.	
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1.86	This paragraph is slightly unclear: we presume that the reference to the “group currency of reporting” applies only to group reporting and not to solo undertaking reporting.	
Section IX. General Comments		
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Compliance and Reporting Rules General Comments		
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Technical Annex I General Comments	Given EIOPA's publication of the stabilised reporting package in July 2012, it would be far easier to comment on this Annex if a list of changes (if any) to that package was available, instead of simply replicating the requirements of the package with any such changes being already incorporated.	
BI-1		
BS-C1-2		
BS-C1-3		
BS-C1D-4		
AS-D1-5		
AS-D1-6		
AS-D2O-7		
AS-D2O-8		
TP-F1-9		
TP-E1-10		
TP-F1Q-11		
TP-E1Q-12		
OF-B1Q-13		
SCR-B2A-14	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR-B2A-15	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR-B2B-16	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR-B2B-17	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR-B2C-18		
SCR-B2C-19		
SCR-B3A-20	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR-B3A-21	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR-B3B-22	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR-B3B-23	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR-B3C-24	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR-B3C-25	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR-B3D-26	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR-B3D-27	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR-B3E-28	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	

SCR-B3E-29	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR-B3F-30	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR-B3F-31	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR-B3G-32	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR-B3G-33	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
MCR-B4A-34		
MCR-B4B-35		
G01-36	Some of the information to be provided in this form will actually come from the NCA after the implementation of Solvency II: it is therefore possible that some of the data might not be available during the preparatory phase.	
G03-37		
G03-38		
G03-39		
G04-40		
G14-41		
Technical Annex II General Comments		
Technical Annex III General Comments		
BI - General Comments		
BI- cell A1		
BI- cell A2		
BI- cell A3		
BI- cell A4		
BI- cell A5		
BI- cell A6		
BI- cell A7		
BI- cell A8		
BI- cell A9		
BI- cell A10		
BS-C1 - General		

Comment		
BS-C1- cell AS1		
BS-C1- cell AS24		
BS-C1- cell A2		
BS-C1- cell A26		
BS-C1- cell A25B		
BS-C1- cell A3		
BS-C1- cell A4		
BS-C1- cell A5		
BS-C1- cell A6		
BS-C1- cell A7B		
BS-C1- cell A7		
BS-C1- cell A7A		
BS-C1- cell A8E		
BS-C1- cell A8		
BS-C1- cell A8A		
BS-C1- cell A8C		
BS-C1- cell A8D		
BS-C1- cell A9		
BS-C1- cell A10A		
BS-C1- cell A10B		
BS-C1- cell A11		
BS-C1- cell A12		
BS-C1- cell A14		
BS-C1- cell A14B		
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BS-C1- cell A21		
BS-C1- cell A20		
BS-C1- cell A23		
BS-C1- cell A28A		
BS-C1- cell A28B		
BS-C1- cell A27		
BS-C1- cell A29		
BS-C1- cell A30		
BS-C1- cell LS0		
BS-C1- cell L1		
BS-C1- cell L1A		
BS-C1- cell L2		
BS-C1- cell L3		
BS-C1- cell L4		
BS-C1- cell L4A		
BS-C1- cell L5		
BS-C1- cell L6		
BS-C1- cell LS6F		
BS-C1- cell L6B		
BS-C1- cell L6C		
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BS-C1- cell L15A		
BS-C1- cell L15B		
BS-C1- cell L15C		
BS-C1- cell L15E		
BS-C1- cell L15D		
BS-C1- cell L26		
BS-C1- cell L25		
BS-C1- cell L25A		
BS-C1- cell L27		
BS-C1D – General Comments		
BS-C1D- cell A1		
BS-C1D- cell B1		
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AS-D1- General Comment		
AS-D1- cell A1		
AS-D1- cell A2		
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AS-D20- cell A34		
AS-D20- cell A35		
AS-D20- cell A50		
TP-F1- General Comments		
TP-F1- cell J1,J2,J4,J6,J7,J9,J10,J12,J 13,J14		
TP-F1- cell JA1,JA2,JA4,JA6,JA7,JA9,J A10,JA12,JA13,JA14		
TP-F1- cell JE1,JE2,JE4,JE6,JE7,JE9,JE 10,JE12,JE13,JE14		
TP-F1- cell JF1,JF2,JF4,JF6,JF7,JF9,JF1 0,JF12,JF13,JF14		
TP-E1- General Comments		
TP-E1- cells A43-L43		
TP-E1- cells A44-L44		
TP-E1- cells A45-L45		
TP-E1- cells A46-L46		
TP-E1- cells Q43-Q46		

TP-F1Q- General Comments		
TP-F1Q- cells A1		
TP-F1Q- cells A3		
TP-F1Q- cells A5		
TP-F1Q- cells A6		
TP-F1Q- cells A7		
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TP-F1Q- cells A7B		
TP-F1Q- cells A7C		
TP-F1Q- cells A9		
TP-F1Q- cells A10		
TP-F1Q- cells A12		
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TP-F1Q- cells A14		
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TP-F1Q- cells F14		
TP-E1Q- General		

Comments		
TP-E1Q- cells A1-P1		
TP-E1Q- cells Q1		
TP-E1Q- cells A5-P5		
TP-E1Q- cells A12-P12		
TP-E1Q- cells A13-P13		
TP-E1Q- cells Q5-Q13		
TP-E1Q- cells A14-P14		
TP-E1Q- cells A21-P21		
TP-E1Q- cells A22-P22		
TP-E1Q- cells Q14-Q22		
TP-E1Q- cells A23-P23		
TP-E1Q- cells A24-P24		
TP-E1Q- cells A25-P25		
TP-E1Q- cells Q23		
TP-E1Q- cells Q24		
TP-E1Q- cells Q25		
TP-E1Q- cells A26-P26		
TP-E1Q- cells A27-P27		
TP-E1Q- cells A28-P28		
TP-E1Q- cells Q26		
TP-E1Q- cells Q27		
TP-E1Q- cells Q28		
OF-B1Q – General Comments		
OF-B1Q- cell A1		
OF-B1Q- cell B1		
OF-B1Q- cell C1		
OF-B1Q- cell A1A		
OF-B1Q- cell C1A		
OF-B1Q- cell A2		

OF-B1Q- cell B2		
OF-B1Q- cell C2		
OF-B1Q- cell A3		
OF-B1Q- cell B3		
OF-B1Q- cell C3		
OF-B1Q- cell A4		
OF-B1Q- cell B4		
OF-B1Q- cell C4		
OF-B1Q- cell D4		
OF-B1Q- cell A5		
OF-B1Q- cell B5		
OF-B1Q- cell C5		
OF-B1Q- cell D5		
OF-B1Q- cell A6		
OF-B1Q- cell B6		
OF-B1Q- cell A7		
OF-B1Q- cell B7		
OF-B1Q- cell A8		
OF-B1Q- cell B8		
OF-B1Q- cell C8		
OF-B1Q- cell D8		
OF-B1Q- cell A9		
OF-B1Q- cell B9		
OF-B1Q- cell C9		
OF-B1Q- cell D9		
OF-B1Q- cell A10		
OF-B1Q- cell B10		
OF-B1Q- cell C10		
OF-B1Q- cell D10		
OF-B1Q- cell A11		
OF-B1Q- cell B11		

OF-B1Q- cell C11		
OF-B1Q- cell D11		
OF-B1Q- cell A12		
OF-B1Q- cell B12		
OF-B1Q- cell A12A		
OF-B1Q- cell B12A		
OF-B1Q- cell A13		
OF-B1Q- cell B13		
OF-B1Q- cell C13		
OF-B1Q- cell D13		
OF-B1Q- cell A14		
OF-B1Q- cell B14		
OF-B1Q- cell C14		
OF-B1Q- cell D14		
OF-B1Q- cell A15		
OF-B1Q- cell D15		
OF-B1Q- cell A15A		
OF-B1Q- cell D15A		
OF-B1Q- cell A16		
OF-B1Q- cell B16		
OF-B1Q- cell B16A		
OF-B1Q- cell C16		
OF-B1Q- cell D16		
OF-B1Q- cell A17		
OF-B1Q- cell B17		
OF-B1Q- cell B17A		
OF-B1Q- cell C17		
OF-B1Q- cell D17		
OF-B1Q- cell A18		
OF-B1Q- cell B18		
OF-B1Q- cell B18A		

OF-B1Q- cell C18		
OF-B1Q- cell D18		
OF-B1Q- cell A19		
OF-B1Q- cell B19		
OF-B1Q- cell B19A		
OF-B1Q- cell C19		
OF-B1Q- cell D19		
OF-B1Q- cell B502		
OF-B1Q- cell A503		
OF-B1Q- cell B503		
OF-B1Q- cell C503		
OF-B1Q- cell D503		
OF-B1Q- cell A603		
OF-B1Q- cell B603		
OF-B1Q- cell C603		
OF-B1Q- cell D603		
OF-B1Q- cell A604		
OF-B1Q- cell B604		
OF-B1Q- cell C604		
OF-B1Q- cell D604		
OF-B1Q- cell E604		
OF-B1Q- cell A605		
OF-B1Q- cell B605		
OF-B1Q- cell C605		
OF-B1Q- cell D605		
OF-B1Q- cell E605		
OF-B1Q- cell A606		
OF-B1Q- cell B606		
OF-B1Q- cell C606		
OF-B1Q- cell D606		
OF-B1Q- cell E606		

OF-B1Q- cell A607		
OF-B1Q- cell B607		
OF-B1Q- cell C607		
OF-B1Q- cell D607		
OF-B1Q- cell E607		
OF-B1Q- cell A20		
OF-B1Q- cell B20		
OF-B1Q- cell B20A		
OF-B1Q- cell C20		
OF-B1Q- cell D20		
OF-B1Q- cell A21		
OF-B1Q- cell B21		
OF-B1Q- cell B21A		
OF-B1Q- cell C21		
OF-B1Q- cell D21		
OF-B1Q- cell A42		
OF-B1Q- cell C42		
OF-B1Q- cell D42		
OF-B1Q- cell A43		
OF-B1Q- cell C43		
OF-B1Q- cell D43		
OF-B1Q- cell A44		
OF-B1Q- cell C44		
OF-B1Q- cell D44		
OF-B1Q- cell A46		
OF-B1Q- cell B46		
OF-B1Q- cell C46		
OF-B1Q- cell D46		
OF-B1Q- cell E46		
OF-B1Q- cell A47		
OF-B1Q- cell B47		

OF-B1Q- cell C47		
OF-B1Q- cell D47		
OF-B1Q- cell A50		
OF-B1Q- cell B50		
OF-B1Q- cell C50		
OF-B1Q- cell D50		
OF-B1Q- cell E50		
OF-B1Q- cell A51		
OF-B1Q- cell B51		
OF-B1Q- cell C51		
OF-B1Q- cell D51		
OF-B1Q- cell A52		
OF-B1Q- cell A53		
OF-B1Q- cell A45		
OF-B1Q- cell A45A		
OF-B1Q- cell A45B		
OF-B1Q- cell A45C		
OF-B1Q- cell A45D		
OF-B1Q- cell B45D		
OF-B1Q- cell C45D		
OF-B1Q- cell D45D		
OF-B1Q- cell E45D		
OF-B1Q- cell A45E		
OF-B1Q- cell B45E		
OF-B1Q- cell C45E		
OF-B1Q- cell D45E		
OF-B1Q- cell E45E		
OF-B1Q- cell A48		
OF-B1Q- cell B48		
OF-B1Q- cell C48		
OF-B1Q- cell D48		

OF-B1Q- cell E48		
OF-B1Q- cell A49		
OF-B1Q- cell B49		
OF-B1Q- cell C49		
OF-B1Q- cell D49		
OF-B1Q- cell A50A		
OF-B1Q- cell B50A		
OF-B1Q- cell C50A		
OF-B1Q- cell D50A		
OF-B1Q- cell E50A		
OF-B1Q- cell A51A		
OF-B1Q- cell B51A		
OF-B1Q- cell C51A		
OF-B1Q- cell D51A		
OF-B1Q- cell A52A		
OF-B1Q- cell A53A		
OF-B1Q- cell A53B		
OF-B1Q- cell B23		
OF-B1Q- cell B24		
OF-B1Q- cell B25		
OF-B1Q- cell B26		
OF-B1Q- cell B27		
OF-B1Q- cell B28		
OF-B1Q- cell B29		
OF-B1Q- cell B29A		
OF-B1Q- cell A30		
OF-B1Q- cell A31		
OF-B1Q- cell A32		
SCR - B2A – General Comment	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR - B2A - cell A1		

SCR - B2A - cell B1		
SCR - B2A - cell A01		
SCR - B2A - cell A2		
SCR - B2A - cell B2		
SCR - B2A - cell A02		
SCR - B2A - cell A3		
SCR - B2A - cell B3		
SCR - B2A - cell A03		
SCR - B2A - cell A4		
SCR - B2A - cell B4		
SCR - B2A - cell A04		
SCR - B2A - cell A5		
SCR - B2A - cell B5		
SCR - B2A - cell A05		
SCR - B2A - cell A6		
SCR - B2A - cell B6		
SCR - B2A - cell A7		
SCR - B2A - cell B7		
SCR - B2A - cell A07		
SCR - B2A - cell A10		
SCR - B2A - cell B10		
SCR - B2A - cell A11		
SCR - B2A - cell A12		
SCR - B2A - cell A13		
SCR - B2A - cell A013		
SCR - B2A - cell A14A		
SCR - B2A - cell A14C		
SCR - B2A - cell A8		
SCR - B2A - cell A9		
SCR - B2A - cell A17		
SCR - B2A - cell A15		

SCR - B2A - cell A15A		
SCR - B2A - cell A15B		
SCR - B2A - cell A15C		
SCR - B2A - cell A16		
SCR - B2A - cell A18		
SCR - B2A - cell A20		
SCR - B2A - cell A21		
SCR - B2A - cell A14B		
SCR - B2A - cell A14		
SCR - B2A - cell A11A		
SCR - B2A - cell A11B		
SCR - B2B – General Comment	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR - B2B- cell A1		
SCR - B2B- cell A1A		
SCR - B2B- cell A1B		
SCR - B2B- cell A1C		
SCR - B2B- cell B1		
SCR - B2B- cell C1		
SCR - B2B- cell B2		
SCR - B2B- cell C2		
SCR - B2B- cell B3		
SCR - B2B- cell C3		
SCR - B2B- cell B4		
SCR - B2B- cell C4		
SCR - B2B- cell B5		
SCR - B2B- cell B6		
SCR - B2B- cell B7		
SCR - B2B- cell C5		
SCR - B2B- cell C6		
SCR - B2B- cell B8		

SCR - B2B- cell B8AA		
SCR - B2B- cell B8A		
SCR - B2B- cell A11A		
SCR - B2B- cell A11B		
SCR - B2C - General Comment		
SCR - B2C- cell A1		
SCR - B2C- cell A1A		
SCR - B2C- cell A1B		
SCR - B2C- cell A1C		
SCR - B2C- cell B1		
SCR - B2C- cell C1		
SCR - B2C- cell B2		
SCR - B2C- cell C2		
SCR - B2C- cell B3		
SCR - B2C- cell C3		
SCR - B2C- cell B4		
SCR - B2C- cell C4		
SCR - B2C- cell B5		
SCR - B2C- cell B6		
SCR - B2C- cell B7		
SCR - B2C- cell B7A		
SCR - B2C- cell B7B		
SCR - B2C- cell B7C		
SCR - B2C- cell B8		
SCR - B2C- cell B9		
SCR - B2C- cell B10		
SCR - B2C- cell B12		
SCR - B2C- cell B13		
SCR - B2C- cell C5		
SCR - B2C- cell C6		

SCR - B2C- cell B14		
SCR - B2C- cell B14AA		
SCR - B2C- cell B14A		
SCR - B2C- cell A11A		
SCR - B2C- cell A11B		
SCR - B3A – General Comment	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR - B3A – cell A00		
SCR - B3A – cell AA01		
SCR - B3A – cell AA02		
SCR - B3A – cell AA03		
SCR - B3A – cel A30		
SCR - B3A- cell C0		
SCR - B3A- cell D0		
SCR - B3A- cell A1		
SCR - B3A- cell A2		
SCR - B3A- cell A1A		
SCR - B3A- cell A2A		
SCR - B3A- cell B1		
SCR - B3A- cell B2		
SCR - B3A- cell B1A		
SCR - B3A- cell B2A		
SCR - B3A- cell C1		
SCR - B3A- cell C2		
SCR - B3A- cell B1B		
SCR - B3A- cell B2B		
SCR - B3A- cell D1		
SCR - B3A- cell D2		
SCR - B3A- cell C3		
SCR - B3A- cell D3		
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 C8		
SCR - B3A- cell B8B		
SCR - B3A- cell D8		
SCR - B3A- cell A9		
SCR - B3A- cell B9		
SCR - B3A- cell A10		
SCR - B3A- cell B10		
SCR - B3A- cell A11		
SCR - B3A- cell B11		
SCR - B3A- cell A12		
SCR - B3A- cell A12A		
SCR - B3A- cell B12		
SCR - B3A- cell B12A		
SCR - B3A- cell C12		
SCR - B3A- cell B12B		

SCR - B3A- cell D12		
SCR - B3A- cell C13		
SCR - B3A- cell D13		
SCR - B3A- cell A14		
SCR - B3A- cell A14A		
SCR - B3A- cell B14		
SCR - B3A- cell B14A		
SCR - B3A- cell C14		
SCR - B3A- cell B14B		
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		
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 C22		
SCR - B3A- cell D22		
SCR - B3A- cell C23		
SCR - B3A- cell D23		
SCR - B3B – General Comment	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR - B3B – cell A00		
SCR - B3B – cell A001		
SCR - B3B – cell A30		
SCR - B3B – cell A10		
SCR - B3B- cell A1		
SCR - B3B- cell B1		
SCR - B3B- cell C0		
SCR - B3B- cell C1		
SCR - B3B- cell A2		
SCR - B3B- cell A3		
SCR - B3B- cell C3		
SCR - B3B- cell D4		
SCR - B3B- cell C4		
SCR - B3C – General Comment	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	

SCR - B3C - cell A01		
SCR - B3C - cell A02		
SCR - B3C - cell A03		
SCR - B3C - cell A04		
SCR - B3C - cell A05		
SCR - B3C - cell A06		
SCR - B3C - cell A001		
SCR - B3C - cell A30		
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		
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		
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		
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 - B3D – General Comment	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR - B3D – cell A01		
SCR - B3D – cell A02		
SCR - B3D – cell A03		
SCR - B3D – cell A04		
SCR - B3D – cell A05		
SCR - B3C – cell A001		
SCR - B3C – cell A30		
SCR - B3D- cell A1		
SCR - B3D- cell A1A		
SCR - B3D- cell B1		
SCR - B3D- cell B1A		
SCR - B3D- cell C1		
SCR - B3D- cell B1B		
SCR - B3D- cell D1		

SCR - B3D- cell A2		
SCR - B3D- cell A2A		
SCR - B3D- cell B2		
SCR - B3D- cell B2A		
SCR - B3D- cell C2		
SCR - B3D- cell B2B		
SCR - B3D- cell D2		
SCR - B3D- cell A3		
SCR - B3D- cell A3A		
SCR - B3D- cell B3		
SCR - B3D- cell B3A		
SCR - B3D- cell C3		
SCR - B3D- cell B3B		
SCR - B3D- cell D3		
SCR - B3D- cell C04		
SCR - B3D- cell D04		
SCR - B3D- cell A4		
SCR - B3D- cell A4A		
SCR - B3D- cell B4		
SCR - B3D- cell B4A		
SCR - B3D- cell C4		
SCR - B3D- cell B4B		
SCR - B3D- cell D4		
SCR - B3D- cell A5		
SCR - B3D- cell A5A		
SCR - B3D- cell B5		
SCR - B3D- cell B5A		
SCR - B3D- cell C5		
SCR - B3D- cell B5B		
SCR - B3D- cell D5		
SCR - B3D- cell A6		

SCR - B3D- cell A6A		
SCR - B3D- cell B6		
SCR - B3D- cell B6A		
SCR - B3D- cell C6		
SCR - B3D- cell B6B		
SCR - B3D- cell D6		
SCR - B3D- cell A7		
SCR - B3D- cell A7A		
SCR - B3D- cell B7		
SCR - B3D- cell B7A		
SCR - B3D- cell C7		
SCR - B3D- cell B7B		
SCR - B3D- cell D7		
SCR - B3D- cell A8		
SCR - B3D- cell A8A		
SCR - B3D- cell B8		
SCR - B3D- cell B8A		
SCR - B3D- cell C8		
SCR - B3D- cell B8B		
SCR - B3D- cell D8		
SCR - B3D- cell C9		
SCR - B3D- cell D9		
SCR - B3D- cell C10		
SCR - B3D- cell D10		
SCR - B3D- cell C12		
SCR - B3D- cell D12		
SCR - B3D- cell E12		
SCR - B3D- cell F12		
SCR - B3D- cell C13		
SCR - B3D- cell D13		
SCR - B3D- cell E13		

SCR - B3D- cell F13		
SCR - B3D- cell C14		
SCR - B3D- cell D14		
SCR - B3D- cell E14		
SCR - B3D- cell F14		
SCR - B3D- cell C15		
SCR - B3D- cell D15		
SCR - B3D- cell E15		
SCR - B3D- cell F15		
SCR - B3D- cell A16		
SCR - B3D- cell F16		
SCR - B3D- cell A17		
SCR - B3D- cell A18		
SCR - B3D- cell A18A		
SCR - B3D- cell B18		
SCR - B3D- cell B18B		
SCR - B3D- cell D18		
SCR - B3D- cell D19		
SCR - B3D- cell D20		
SCR - B3D- cell B21		
SCR - B3D- cell A21		
SCR - B3D- cell B22		
SCR - B3D- cell A22		
SCR - B3D- cell B23		
SCR - B3D- cell A23		
SCR - B3D- cell B24		
SCR - B3D- cell A24		
SCR - B3D- cell B25		
SCR - B3D- cell A25		
SCR - B3D- cell B26		
SCR - B3D- cell A26		

SCR - B3D- cell B27		
SCR - B3D- cell A27		
SCR - B3E – General Comment	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR - B3E- cell A001		
SCR - B3E- cell A30		
SCR - B3E- cell C1		
SCR - B3E- cell D1		
SCR - B3E- cell E1		
SCR - B3E- cell F1		
SCR - B3E- cell C2		
SCR - B3E- cell D2		
SCR - B3E- cell E2		
SCR - B3E- cell F2		
SCR - B3E- cell C3		
SCR - B3E- cell D3		
SCR - B3E- cell E3		
SCR - B3E- cell F3		
SCR - B3E- cell C4		
SCR - B3E- cell D4		
SCR - B3E- cell E4		
SCR - B3E- cell F4		
SCR - B3E- cell C5		
SCR - B3E- cell D5		
SCR - B3E- cell E5		
SCR - B3E- cell F5		
SCR - B3E- cell C6		
SCR - B3E- cell D6		
SCR - B3E- cell E6		
SCR - B3E- cell F6		
SCR - B3E- cell C7		

SCR - B3E- cell D7		
SCR - B3E- cell E7		
SCR - B3E- cell F7		
SCR - B3E- cell C8		
SCR - B3E- cell D8		
SCR - B3E- cell E8		
SCR - B3E- cell F8		
SCR - B3E- cell C9		
SCR - B3E- cell D9		
SCR - B3E- cell E9		
SCR - B3E- cell F9		
SCR - B3E- cell C10		
SCR - B3E- cell D10		
SCR - B3E- cell E10		
SCR - B3E- cell F10		
SCR - B3E- cell C11		
SCR - B3E- cell D11		
SCR - B3E- cell E11		
SCR - B3E- cell F11		
SCR - B3E- cell C12		
SCR - B3E- cell D12		
SCR - B3E- cell E12		
SCR - B3E- cell F12		
SCR - B3E- cell A13		
SCR - B3E- cell F13		
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 Comment	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR - B3F- cell A1		
SCR - B3F- cell A2-A6		
SCR - B3F- cell A7		
SCR - B3F- cell B1		
SCR - B3F- cell B2-B6		
SCR - B3F- cell B7		
SCR - B3F- cell C1		
SCR - B3F- cell C2-C6		
SCR - B3F- cell C7		
SCR - B3F- cell A8		
SCR - B3F- cell B8		
SCR - B3F- cell C8		
SCR - B3F- cell A9		
SCR - B3F- cell A10-A15		
SCR - B3F- cell A16		
SCR - B3F- cell B9		
SCR - B3F- cell B10-B15		
SCR - B3F- cell B16		
SCR - B3F- cell C9		
SCR - B3F- cell C10-C15		
SCR - B3F- cell C16		
SCR - B3F- cell A17		
SCR - B3F- cell A18		
SCR - B3F- cell B17		
SCR - B3F- cell B18		
SCR - B3F- cell C17		

SCR - B3F- cell C18		
SCR - B3F- cell A19		
SCR - B3F- cell A20		
SCR - B3F- cell A21		
SCR - B3F- cell B19		
SCR - B3F- cell B20		
SCR - B3F- cell B21		
SCR - B3F- cell C19		
SCR - B3F- cell C20		
SCR - B3F- cell C21		
SCR - B3F- cell A22		
SCR - B3F- cell A23-A25		
SCR - B3F- cell A26		
SCR - B3F- cell B22		
SCR - B3F- cell B23-B25		
SCR - B3F- cell B26		
SCR - B3F- cell C22		
SCR - B3F- cell C23-C25		
SCR - B3F- cell C26		
SCR - B3F- cell AA1-AA20		
SCR - B3F- cell AA21		
SCR - B3F- cell AA22-AA35		
SCR - B3F- cell AA36		
SCR - B3F- cell AA37		
SCR - B3F- cell AB1-AB20		
SCR - B3F- cell AB21		
SCR - B3F- cell AB22-AB35		
SCR - B3F- cell AB36		
SCR - B3F- cell AB37		
SCR - B3F- cell AC1-AC20		
SCR - B3F- cell AC21		

SCR - B3F- cell AD1-AD20		
SCR - B3F- cell AD21		
SCR - B3F- cell AE1-AE20		
SCR - B3F- cell AF1-AF20		
SCR - B3F- cell AF21		
SCR - B3F- cell AF36		
SCR - B3F- cell AF37		
SCR - B3F- cell AF38		
SCR - B3F- cell AF39		
SCR - B3F- cell AG1-AG20		
SCR - B3F- cell AG21		
SCR - B3F- cell AG36		
SCR - B3F- cell AG37		
SCR - B3F- cell AH1-AH20		
SCR - B3F- cell AH21		
SCR - B3F- cell AH36		
SCR - B3F- cell AH37		
SCR - B3F- cell AI1-AI20		
SCR - B3F- cell AI21		
SCR - B3F- cell AI36		
SCR - B3F- cell AI37		
SCR - B3F- cell AI38		
SCR - B3F- cell AI39		
SCR - B3F- cell BA1-BA20		
SCR - B3F- cell BA21		
SCR - B3F- cell BA22-BA35		
SCR - B3F- cell BA36		
SCR - B3F- cell BA37		
SCR - B3F- cell BB1-BB20		
SCR - B3F- cell BB21		
SCR - B3F- cell BB22-BB35		

SCR - B3F- cell BB36		
SCR - B3F- cell BB37		
SCR - B3F- cell BC1-BC20		
SCR - B3F- cell BC21		
SCR - B3F- cell BD1-BD20		
SCR - B3F- cell BD21		
SCR - B3F- cell BE1-BE20		
SCR - B3F- cell BE21		
SCR - B3F- cell BE36		
SCR - B3F- cell BE37		
SCR - B3F- cell BE38		
SCR - B3F- cell BE39		
SCR - B3F- cell BF1-BF20		
SCR - B3F- cell BF21		
SCR - B3F- cell BF36		
SCR - B3F- cell BF37		
SCR - B3F- cell BG1-BG20		
SCR - B3F- cell BG21		
SCR - B3F- cell BG36		
SCR - B3F- cell BG37		
SCR - B3F- cell BH1-BH20		
SCR - B3F- cell BH21		
SCR - B3F- cell BH36		
SCR - B3F- cell BH37		
SCR - B3F- cell BH38		
SCR - B3F- cell BH39		
SCR - B3F- cell CA1-CA14		
SCR - B3F- cell CA15		
SCR - B3F- cell CA16-CA29		
SCR - B3F- cell CA30		
SCR - B3F- cell CA31		

SCR - B3F- cell CB1-CB14		
SCR - B3F- cell CB15		
SCR - B3F- cell CB16-CB29		
SCR - B3F- cell CB30		
SCR - B3F- cell CB31		
SCR - B3F- cell CC1-CC14		
SCR - B3F- cell CC15		
SCR - B3F- cell CD1-CD14		
SCR - B3F- cell CD15		
SCR - B3F- cell CE1-CE14		
SCR - B3F- cell CF1-CF14		
SCR - B3F- cell CF15		
SCR - B3F- cell CF30		
SCR - B3F- cell CF31		
SCR - B3F- cell CF32		
SCR - B3F- cell CF33		
SCR - B3F- cell CG1-CG14		
SCR - B3F- cell CG15		
SCR - B3F- cell CG30		
SCR - B3F- cell CG31		
SCR - B3F- cell CH1-CH14		
SCR - B3F- cell CH15		
SCR - B3F- cell CH30		
SCR - B3F- cell CH31		
SCR - B3F- cell CI1-CI14		
SCR - B3F- cell CI15		
SCR - B3F- cell CI30		
SCR - B3F- cell CI31		
SCR - B3F- cell CI32		
SCR - B3F- cell CI33		
SCR - B3F- cell DA1-DA9		

SCR - B3F- cell DA10		
SCR - B3F- cell DA11-DA24		
SCR - B3F- cell DA25		
SCR - B3F- cell DA26		
SCR - B3F- cell DB1-DB9		
SCR - B3F- cell DB10		
SCR - B3F- cell DB11-DB24		
SCR - B3F- cell DB25		
SCR - B3F- cell DB26		
SCR - B3F- cell DC1-DC9		
SCR - B3F- cell DC10		
SCR - B3F- cell DD1-DD9		
SCR - B3F- cell DD10		
SCR - B3F- cell DE1-DE9		
SCR - B3F- cell DF1-DF9		
SCR - B3F- cell DF10		
SCR - B3F- cell DF25		
SCR - B3F- cell DF26		
SCR - B3F- cell DF27		
SCR - B3F- cell DF28		
SCR - B3F- cell DG1-DG9		
SCR - B3F- cell DG10		
SCR - B3F- cell DG25		
SCR - B3F- cell DG26		
SCR - B3F- cell DH1-DH9		
SCR - B3F- cell DH10		
SCR - B3F- cell DH25		
SCR - B3F- cell DH26		
SCR - B3F- cell DI1-DI9		
SCR - B3F- cell DI10		
SCR - B3F- cell DI25		

SCR - B3F- cell DI26		
SCR - B3F- cell DI27		
SCR - B3F- cell DI28		
SCR - B3F- cell EA1		
SCR - B3F- cell EB1		
SCR - B3F- cell EC1		
SCR - B3F- cell ED1		
SCR - B3F- cell EE1		
SCR - B3F- cell EE2		
SCR - B3F- cell EE3		
SCR - B3F- cell EF1		
SCR - B3F- cell EG1		
SCR - B3F- cell EH1		
SCR - B3F- cell EH2		
SCR - B3F- cell EH3		
SCR - B3F- cell FA1		
SCR - B3F- cell FB1		
SCR - B3F- cell FC1		
SCR - B3F- cell FD1		
SCR - B3F- cell FE1		
SCR - B3F- cell GA1		
SCR - B3F- cell GA2		
SCR - B3F- cell GA3		
SCR - B3F- cell GA4		
SCR - B3F- cell GA5		
SCR - B3F- cell GA6		
SCR - B3F- cell HA1		
SCR - B3F- cell HB1		
SCR - B3F- cell HC1		
SCR - B3F- cell HD1		
SCR - B3F- cell HE1		

SCR - B3F- cell HF1		
SCR - B3F- cell HG1		
SCR - B3F- cell HH1		
SCR - B3F- cell HA2-HE2		
SCR - B3F- cell HF2		
SCR - B3F- cell HG2		
SCR - B3F- cell HH2		
SCR - B3F- cell HI2		
SCR - B3F- cell HJ2		
SCR - B3F- cell HA3		
SCR - B3F- cell HB3		
SCR - B3F- cell HC3		
SCR - B3F- cell HA4		
SCR - B3F- cell HB4		
SCR - B3F- cell HC4		
SCR - B3F- cell HA5		
SCR - B3F- cell HB5		
SCR - B3F- cell HC5		
SCR - B3F- cell IA1-IB1		
SCR - B3F- cell IC1		
SCR - B3F- cell ID1		
SCR - B3F- cell IE1		
SCR - B3F- cell IF1		
SCR - B3F- cell JA1		
SCR - B3F- cell JA2		
SCR - B3F- cell JA3		
SCR - B3F- cell JA4		
SCR - B3F- cell KA1-KE1		
SCR - B3F- cell KA2-KE2		
SCR - B3F- cell KA3-KE3		
SCR - B3F- cell KA4-KE4		

SCR - B3F- cell KA5-KE5		
SCR - B3F- cell KA6-KE6		
SCR - B3F- cell KA7-KE7		
SCR - B3F- cell KF1		
SCR - B3F- cell KF4		
SCR - B3F- cell KF5		
SCR - B3F- cell KF6		
SCR - B3F- cell KF7		
SCR - B3F- cell KA8		
SCR - B3F- cell KB8		
SCR - B3F- cell KC8		
SCR - B3F- cell KA9		
SCR - B3F- cell KB9		
SCR - B3F- cell KC9		
SCR - B3F- cell KA10		
SCR - B3F- cell KB10		
SCR - B3F- cell KC10		
SCR - B3F- cell LA1-LB1		
SCR - B3F- cell LC1		
SCR - B3F- cell LA2-LB2		
SCR - B3F- cell LC2		
SCR - B3F- cell LA3-LB3		
SCR - B3F- cell LC3		
SCR - B3F- cell LA4-LB4		
SCR - B3F- cell LC4		
SCR - B3F- cell LA5-LB5		
SCR - B3F- cell LC5		
SCR - B3F- cell LA6-LB6		
SCR - B3F- cell LC6		
SCR - B3F- cell LA7		
SCR - B3F- cell LA8		

SCR - B3F- cell LA9		
SCR - B3F- cell LA10		
SCR - B3F- cell LA11		
SCR - B3F- cell LA12		
SCR - B3F- cell LB12		
SCR - B3F- cell LC12		
SCR - B3F- cell LA13		
SCR - B3F- cell LB13		
SCR - B3F- cell LC13		
SCR - B3F- cell LA14		
SCR - B3F- cell LB14		
SCR - B3F- cell LC14		
SCR - B3F- cell MA1-ME1		
SCR - B3F- cell MA2-ME2		
SCR - B3F- cell MF2		
SCR - B3F- cell MG2		
SCR - B3F- cell MH2		
SCR - B3F- cell MF3		
SCR - B3F- cell MG3		
SCR - B3F- cell MH3		
SCR - B3F- cell MF4		
SCR - B3F- cell MG4		
SCR - B3F- cell MH4		
SCR - B3F- cell NA1,NC1,NE1,NG1,NI1		
SCR - B3F- cell NB1,ND1,NF1,NH1,NJ1		
SCR - B3F- cell NK1		
SCR - B3F- cell NK32		
SCR - B3F- cell NK33		
SCR - B3F- cell NK34		

SCR - B3F- cell NL1		
SCR - B3F- cell NL32		
SCR - B3F- cell NM1		
SCR - B3F- cell NM32		
SCR - B3F- cell NN1		
SCR - B3F- cell NN32		
SCR - B3F- cell NN33		
SCR - B3F- cell NN34		
SCR - B3F- cell OA1		
SCR - B3F- cell OB1,OC1,OD1,OE1,OF1		
SCR - B3F- cell OG1		
SCR - B3F- cell OG21		
SCR - B3F- cell OG22		
SCR - B3F- cell OG23		
SCR - B3F- cell OH1		
SCR - B3F- cell OH21		
SCR - B3F- cell OI1		
SCR - B3F- cell OI21		
SCR - B3F- cell OJ1		
SCR - B3F- cell OJ21		
SCR - B3F- cell OJ22		
SCR - B3F- cell OJ23		
SCR - B3F- cell PA21		
SCR - B3F- cell PB21		
SCR - B3F- cell PC1		
SCR - B3F- cell PD1,PF1,PH1		
SCR - B3F- cell PE1, PG1, PI1		
SCR - B3F- cell PJ1		

SCR - B3F- cell PJ21		
SCR - B3F- cell PK21		
SCR - B3F- cell PL21		
SCR - B3F- cell PM21		
SCR - B3G – General Comments	See 1.13 and 1.23: this QRT ought not to apply to internal model applicants.	
SCR - B3G- cell A30		
SCR - B3G- cell A1		
SCR - B3G- cell A2		
SCR - B3G- cell A3		
SCR - B3G- cell A4		
SCR - B3G- cell A5		
SCR - B3G- cell A6		
SCR - B3G- cell A7		
SCR - B3G- cell A8		
SCR - B3G- cell A9		
SCR - B3G- cell A10		
SCR - B3G- cell A11		
SCR - B3G- cell A12		
SCR - B3G- cell A13		
SCR - B3G- cell A14		
SCR - B3G- cell A15		
SCR - B3G- cell A16		
MCR - B4A – General Comments		
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		
MCR - B4A- cell C14		
MCR - B4A- cell B15		
MCR - B4A- cell C15		
MCR - B4A- cell B16		
MCR - B4A- cell C16		
MCR - B4A- cell B17		
MCR - B4A- cell C17		
MCR - B4A- cell A18		
MCR - B4A- cell B19		
MCR - B4A- cell B20		
MCR - B4A- cell B21		

MCR - B4A- cell B22		
MCR - B4A- cell C23		
MCR - B4A- cell A24		
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 - B4B - General Comments		
MCR - B4B- cell B1		
MCR - B4B- cell C1		
MCR - B4B- cell D2		
MCR - B4B- cell E2		
MCR - B4B- cell F2		
MCR - B4B- cell G2		
MCR - B4B- cell D3		
MCR - B4B- cell E3		
MCR - B4B- cell F3		
MCR - B4B- cell G3		
MCR - B4B- cell D4		
MCR - B4B- cell E4		
MCR - B4B- cell F4		
MCR - B4B- cell G4		
MCR - B4B- cell D5		
MCR - B4B- cell E5		
MCR - B4B- cell F5		
MCR - B4B- cell G5		
MCR - B4B- cell D6		
MCR - B4B- cell E6		

MCR - B4B- cell F6		
MCR - B4B- cell G6		
MCR - B4B- cell D7		
MCR - B4B- cell E7		
MCR - B4B- cell F7		
MCR - B4B- cell G7		
MCR - B4B- cell D8		
MCR - B4B- cell E8		
MCR - B4B- cell F8		
MCR - B4B- cell G8		
MCR - B4B- cell D9		
MCR - B4B- cell E9		
MCR - B4B- cell F9		
MCR - B4B- cell G9		
MCR - B4B- cell D10		
MCR - B4B- cell E10		
MCR - B4B- cell F10		
MCR - B4B- cell G10		
MCR - B4B- cell D11		
MCR - B4B- cell E11		
MCR - B4B- cell F11		
MCR - B4B- cell G11		
MCR - B4B- cell D12		
MCR - B4B- cell E12		
MCR - B4B- cell F12		
MCR - B4B- cell G12		
MCR - B4B- cell D13		
MCR - B4B- cell E13		
MCR - B4B- cell F13		
MCR - B4B- cell G13		
MCR - B4B- cell D14		

MCR - B4B- cell E14		
MCR - B4B- cell F14		
MCR - B4B- cell G14		
MCR - B4B- cell D15		
MCR - B4B- cell E15		
MCR - B4B- cell F15		
MCR - B4B- cell G15		
MCR - B4B- cell D16		
MCR - B4B- cell E16		
MCR - B4B- cell F16		
MCR - B4B- cell G16		
MCR - B4B- cell D17		
MCR - B4B- cell E17		
MCR - B4B- cell F17		
MCR - B4B- cell G17		
MCR - B4B- cell B18		
MCR - B4B- cell C18		
MCR - B4B- cell D19		
MCR - B4B- cell F19		
MCR - B4B- cell D20		
MCR - B4B- cell F20		
MCR - B4B- cell D21		
MCR - B4B- cell F21		
MCR - B4B- cell D22		
MCR - B4B- cell F22		
MCR - B4B- cell E23		
MCR - B4B- cell G23		
MCR - B4B- cell A24		
MCR - B4B- cell A25		
MCR - B4B- cell A26		
MCR - B4B- cell A27		

MCR - B4B- cell A28		
MCR - B4B- cell A29		
MCR - B4B- cell A30		
G01-General Comments		
G01- cell A1		
G01- cell B1		
G01- cell C1		
G01- cell D1		
G01- cell E1		
G01- cell F1		
G01- cell G1		
G01- cell H1a		
G01- cell H1b		
G01- cell H1c		
G01- cell I1a		
G01- cell I1b		
G01- cell J1		
G01- cell K1		
G01- cell L1		
G01- cell M1		
G01- cell N1		
G01- cell O1		
G01- cell P1		
G01- cell Q1		
G01- cell R1		
G01- cell S1		
G01- cell T1		
G01- cell U1		
G03 - General Comments		
G03- cell A1		

G03- cell A2		
G03- cell B1		
G03- cell B2		
G03- cell B3		
G03- cell B4		
G03- cell B5		
G03- cell B6		
G03- cell B7		
G03- cell C1		
G03- cell D1		
G03- cell F1		
G03- cell G1		
G03- cell H1		
G03- cell N1		
G03- cell O1		
G03- cell P1		
G04 – General Comments		
G04- cell A1		
G04- cell A2		
G04- cell A3		
G04- cell B1		
G04- cell C1		
G04- cell D1		
G04- cell E1		
G14- General Comments		
G14- cell A1		
G14- cell B1		
G14- cell S1		
G14- cell C1,F1,I1,L1,O1		
G14- cell D1,G1,J1,M1,P1		

G14- cell E1,H1,K1,N1,Q1		
G14- cell R1		
Technical Annex IV General Comments		
Technical Annex V General Comments		
Technical Annex VI General Comments		
Technical Annex VII General Comments	We welcome this effort by EIOPA to produce a list of cross-checks.	
CAS1		
CAS2		
CAS3		
CAS4		
CAS5		
CAS6		
CAS7		
CAS8		
CAS9		
CAS10	There is a minor typographical error here: "L10" has a "-" after it which needs to be deleted.	
CAS11		
CAS12		
CAS13		
CAS14	There is a minor typographical error here: "L23" has a "-" after it which needs to be deleted.	
CAS15		
CAS16		
CAS17		
CAS18		
CAS19		
CAS20		
CAS21		
CAS22		

CAS23		
CAS24		
CAS25		
CAS26		
CAS27		
CAS28		
CAS29		
CAS30		
CAS31		
CAS32		
CAS33	There are no separate cross checks for a) BS_C1.L10A (= TP_F1Q.A3) and b) BS_C1.L12 (= TP_F1Q.E2). These need to be added.	
CAS34		
CAS35		
CAS36		
CAS37		
CAS38		
CAS39		
CAS40		
CAS41		
CAS42		
CAS43		
CAS44		
CAS45		
CAS46		
CAS47		
CAS48		
CAS49		
CAS50		
CAS51		
CAS52		

CAS53		
CAS54		
CAS55		
CAS56		
CAS57		
CAS58		
CAS59	Given the LOG (MCR-B4A-L) defines B2 as “the technical provisions for medical expense insurance, without risk margin after deduction of the amounts recoverable from reinsurance contracts and SPVs”, we believe the cross-check “>=” ought to be replaced by “=”.	
CAS60	See CAS59	
CAS61	See CAS59	
CAS62	See CAS59	
CAS63	See CAS59	
CAS64	See CAS59	
CAS65	See CAS59	
CAS66	See CAS59	
CAS67	See CAS59	
CAS68	See CAS59	
CAS69	See CAS59	
CAS70	See CAS59	
CAS71	See CAS59	
CAS72	See CAS59	
CAS73	See CAS59	
CAS74	See CAS59	
CAS75	See CAS59	
CAS76	Whilst the Global Filters are correct, the cell references are not: the cross-check ought to refer to cells B2, B3, C2 and C3 of TP-F1Q, not B1 and C1, the latter being relevant for CAS75. Cross-check ought to be “=” not “>=”.	
CAS77	Whilst the Global Filters are correct, the cell references are not: the cross-check ought to refer to cells B4-B7, B10-B13, C4-C7 and C10-C13 of TP-F1Q, not B1 and C1, the latter being relevant for CAS75.	

	Cross-check ought to be "=" not ">=".	
CAS78		
CQS1		
CQS2		
CQS3		
CQS4		
CQS5		
CQS6		
CQS7		
CQS8		
CQS9		
CQS10		
CQS11		
CQS12		
CQS13		
CQS14		
CQS15		
CQS16		
CQS17		
CQS18		
CQS19	There are no separate cross checks for a) BS_C1.L10A (= TP_F1Q.A3) and b) BS_C1.L12 (= TP_F1Q.E2). These need to be added.	
CQS20		
CQS21		
CQS22		
CQS23		
CQS24		
CQS25		
CQS26		
CQS27		
CQS28		

CQS29		
CQS30		
CQS31		
CQS32		
CQS33		
CQS34		
CQS35		
CQS36		
CQS37		
CQS38		
CQS39		
CQS40		
CQS41		
CQS42		
CQS43		
CQS44		
CQS45	See CAS59	
CQS46	See CAS59	
CQS47	See CAS59	
CQS48	See CAS59	
CQS49	See CAS59	
CQS50	See CAS59	
CQS51	See CAS59	
CQS52	See CAS59	
CQS53	See CAS59	
CQS54	See CAS59	
CQS55	See CAS59	
CQS56	See CAS59	
CQS57	See CAS59	
CQS58	See CAS59	
CQS59	See CAS59	

CQS60	See CAS59	
CQS61	See CAS59	
CQS62	<p>Whilst the Global Filters are correct, the cell references are not: the cross-check ought to refer to cells B2, B3, C2 and C3 of TP-F1Q, not B1 and C1, the latter being relevant for CQS61.</p> <p>Cross-check ought to be "=" not ">=".</p>	
CQS63	<p>Whilst the Global Filters are correct, the cell references are not: the cross-check ought to refer to cells B4-B7, B10-B13, C4-C7 and C10-C13 of TP-F1Q, not B1 and C1, the latter being relevant for CQS61.</p> <p>Cross-check ought to be "=" not ">=".</p>	
CGS1		
CGS2		
CGS3		
CGS4		
CGS5		
CGS6		
CGS7		
CGS8		
CGS9		
CGS10		
CGS11		
CGS12		
CGS13		
CGS14		
CGS15		
CGS16		
CGS17		
CGS18		
CGS19		
CGS20		
CGS21		
QCGS1		

Instructions		
Impact Assessment – General Coments	We believe this cost assessment has not properly been carried out and seeks to understate the very significant impact it will have on insurance and reinsurance undertakings. The baseline described in 2.10 fails to take into factors such as EIOPA’s decision to seek additional reporting from internal model firms, in excess of what would be submitted under Solvency II and therefore in addition to what would normally be considered internally by firms during a preparatory phase. No clear rationale is given for the options that are listed under each question, making it harder to understand the logic behind the decisions made.	
2.1		
2.2		
2.3		
2.4		
2.5	All the arguments EIOPA puts forward about how the implementation costs to be incurred by firms will be met in any case, apply equally to smaller undertakings. For that reason – as well as the likelihood that smaller firms will find the transition to Solvency II more difficult – the Guidelines ought to apply equally to them. Since the Guidelines are not recommended for enforcement action by NCAs, we believe NCAs will be able to apply judgement when reviewing the progress made by such firms.	
2.6		
2.7		
2.8		
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2.10		
2.11		
2.12		
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2.14		
2.15		
2.16		
Question 1	This question could have a number of meanings. NCAs can indeed seek to prepare for submission of information, but this could refer to their own systems and processes, essential to receive the data that will be submitted after Solvency II implementation; instead, EIOPA has chosen to focus the meaning of its question – as reflected in the options - on insurance firms only and on submitting reports before implementation.	
Question 1 – Option 1		

Question 1 – Option 2		
Question 2	EIOPA does not explain how these four options were arrived at: other options also exist (e.g. a mixture of options 3 and 4 – everything that is excluded under option 4 as well as those items excluded under option 3).	
Question 2 – Option 1		
Question 2 – Option 2		
Question 2 – Option 3		
Question 2 – Option 4		
Question 3		
Question 3 – Option 1		
Question 3 – Option 2		
Question 3 – Option 3		
Question 4		
Question 4 – Option 1		
Question 4 – Option 2		
Question 4 – Option 3		
Question 4 – Option 4		
Question 4 – Option 5		
Question 5		
Question 5 – Option 1		
Question 5 – Option 2		
Question 6		
Question 6 – Option 1		
Question 6 – Option 2		
Question 6 – Option 3		
Question 6 – Option 4		
Question 7		
Question 7 – Option 1		
Question 7 – Option 2		
Question 7 – Option 3		
2.17		

2.18		
2.19		
2.20		
2.21		
2.22	This does not read clearly: we presume it refers to those undertakings who fall within the scope of the preparatory phase reporting.	
2.23	<p>The so-called negative effects listed here are not correct.</p> <ul style="list-style-type: none"> a) With the proposed thresholds, there will be a divergence at the national level anyway. Further, cross-border groups, like ours, will require data from all undertakings around the group, even if some of them fall outside the scope of the preparatory phase reporting. b) This point is irrelevant: the Solvency II timeline is ultimately dictated by the progress made with OMDII, not the preparatory Guidelines. c) This is only partly mitigated by the Guidelines: the fact that a number of templates and the full extent of narrative reporting is not covered by these Guidelines means that NCAs will have to deal with such data submissions post-implementation anyway. d) Due to the above, as well as the proposed use of thresholds, this risk has not been mitigated by these proposed Guidelines. 	
2.24	The points made here by EIOPA are noted and accepted; however, they do not make the case for anything other than a period of preparation whereby undertakings take steps to be ready for submission post-implementation and the NCAs work with local industry to enable the receipt of information. Instead, these Guidelines go significantly above that.	
2.25	Contrary to what is stated, there is clearly one benefit: the avoidance of having to submit information earlier than what is required under Solvency II.	
2.26		
2.27	<p>Part (b) refers to resources, but whose? Perhaps this argument holds true for NCAs but, for undertakings, it is actually costlier to keep resources partly-employed on a project over an extended period instead of fully-employed over a shorter period.</p> <p>Re part (d), any XBRL costs would not be mitigated, as firms would have to incur such costs twice: once for interim reporting; and once again when the full package and taxonomy is released. For this reason, it is highly unlikely that firms will choose to adopt XBRL prior to the release of the full reporting package.</p>	
2.28	See 2.27.	
2.29	In part (b), EIOPA clearly does not acknowledge the fact that the extra resources required during the reporting process (reconciling, verifying, sign-off, etc) mean extra costs. "The systems need to be	

	<p>prepared”: this does not happen by itself! In any case, such costs would be partially mitigated if the objective was compliance with the final overall package, not with an interim stage of development with an incomplete set of reporting requirements.</p> <p>We believe the reasoning used by EIOPA when mandating such proposals fails to take into account the fact that only part of the final package is being considered: this part is subject to various requirements during the preparatory phase; however the remaining (majority) part of the final reporting requirements will not be subject to any interim requirements, despite the fact that firms will still need to be ready for them. We therefore conclude that EIOPA is content for firms to develop their own internal procedures with respect to such excluded information, despite the potential for there to be difficulties when sourcing such data. Hence, we fail to understand why such prescription is being proposed for the information requested under these Guidelines, given the implied flexibility that is being given with regards to the rest of the final reporting package. Presumably EIOPA is content for NCAs to come to some arrangement with local undertakings regarding the information outside the scope of these Guidelines; if this is the case, EIOPA ought to have restricted these Guidelines to advising NCAs to do just that but with all Pillar III data, not simply a part thereof.</p>	
2.30		
2.31	We believe the benefits stated here for firms outside scope are overstated: they will still face a huge learning curve post-implementation, notwithstanding the fact that (according to 2.27) 70% of the templates will not have been tested at all during the preparatory phase.	
2.32	The reporting envisaged under these Guidelines with regards to the internal model will have no bearing on the model approval process or particularly on the information NCAs will need to review as part of that process. The purpose of the pre-application process is precisely to facilitate earlier familiarisation of the model by NCAs; the reporting proposed here would not assist with this in any way.	
2.33	See 2.31 – we believe this is overstated.	
2.34		
2.35	We concur with these potential benefits, but we believe this ought to have been the focus of any Pillar III-related preparatory Guidelines. NCAs ought to decide individually how they wish to do this. Although this will lead to a lack of harmonisation pre-implementation, this will happen anyway as it is already well-known that a number of NCAs plan to implement Pillar III reporting in full very soon, despite the OMDII limbo. EIOPA ought therefore to have proposed the minimum, as suggested above, and let NCAs decide if they need anything in addition locally.	
2.36		
2.37		

2.38		
2.39	<p>See 2.35 above: we believe EIOPA has focussed too much on the wrong thing in making its proposals.</p> <p>Nowhere here does EIOPA explain why it has chosen to ask firms to provide narrative reporting at all, let alone narrative that describes the current system of governance, as opposed to the system that is expected to exist after SII implementation. Spending time and resource producing narrative that will merely describe a situation that is in a state of flux due to the transition towards SII compliance cannot add any value to anyone, firms, or NCAs. Considering that separate Guidelines exist concerning the system of governance, no narrative reporting ought to be requested for this area, certainly none that requests a description of a pre-Solvency II environment.</p>	
2.40		
2.41		
2.42		
2.43		
2.44	<p>Whilst the ability to calculate and submit information on the SCR is “crucial”, this will already be covered (for internal model firms) as part of the model application process. Making such firms report data also (as well as standard formula data) is duplicative and unnecessary.</p>	
2.45	<p>This assumption is incorrect: internal model applicants are not making preparations to report using standard formula templates (QRT-B3X series). No procedures are set up in respect of these templates.</p>	
2.46	<p>See 2.29 and 2.35: we believe the fact that the majority of the final reporting package is outside the scope of the preparatory phase means emphasis is being misplaced. Rather, NCAs ought to be allowed to decide (which is what the latter are doing anyway, with some reportedly seeking to go above and beyond the EIOPA proposals).</p>	
2.47		
2.48		
2.49		
2.50		
2.51		
2.52		
2.53	<p>We fail to see the difference between the points laid out in this paragraph and those laid out in 2.50 above. All the points EIOPA makes in 2.50 apply equally here.</p> <p>The point about ECB requirements is also noted, but EIOPA has not taken account of the fact that the latter applies only to Euro-area member states; whereas these preparatory Guidelines apply to NCAs in the</p>	

	whole Union. We do not believe it is appropriate for SII policy to be formulated based on developments that do not affect all member states.	
2.54		
2.55	See 2.53 above.	
2.56	We disagree with this assertion, for the reasons set out in 2.46.	
2.57		
2.58	If OMDII introduces proportionality to Pillar III reporting, these Guidelines ought to reflect that by ensuring all those who are due to report after SII implementation do so during the preparatory phase. It is important that any thresholds introduced by these proposed Guidelines do not conflict with OMDII.	
2.59	Given that the introduction of these preparatory-phase Guidelines will result in the need for increased resources at both undertakings and NCAs, this paragraph does not provide sufficient counterargument for this option.	
2.60		
2.61		
2.62		
2.63	Considering the points made by EIOPA in 2.53 above and similar paragraphs regarding ECB reporting requirements, it is surprising EIOPA did not support this option, given the ECB's preference for a higher threshold for quarterly reporting. We do support a lower threshold, as chosen by EIOPA, but this resulting inconsistency only serves to reinforce the point we make in 2.53 above.	
2.64	EIOPA already acknowledges in 2.62 that its preferred approach may lead to divergent outcomes during the preparatory phase. That, as well as the fact that groups will need to require reporting from operations that may fall outside the scope of the Guidelines, means a divergent approach is almost certain. We believe thresholds are not needed, save for any changes arising from the approval of OMDII.	
2.65		
2.66	If the intention of the Guidelines is early preparation, there is little benefit to be gained from asking firms to complete QRTs SCR-B3A-G. We note EIOPA's argument that model approval will not have been given as at the time of implementing these Guidelines and that such approval may never be given, meaning firms will need to have contingency plans for operating on a standard formula basis. We believe our stance is justified based on the Guidelines EIOPA proposes regarding third-country equivalence: such equivalence may not eventually be granted in respect of certain countries, yet undertakings are not being asked to assume this and to report using the 'best-case' scenario whereby equivalence is granted. Similarly, internal model applicants ought to be able to report on the basis that their models will be approved. We do not understand why EIOPA is applying different standards. As for information needed by NCAs, they will obtain all the data they need via the model approval process.	

2.67	See 2.66.	
2.68	See 2.66. Also, the SCR-B3 templates actually do not provide all the information needed by NCAs on the standard formula calculation, especially when comparing the differences in the result with that of the internal model, so all that is achieved by these Guidelines is bureaucracy, not usefulness.	
2.69		
2.70		
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2.74		
2.75	Whilst we agree with EIOPA's decision here, the argument it puts forward against option 4 are the very same arguments to be made against its decision in Question 5. Put another way: the arguments EIOPA makes under Question 5 would equally lead to option 4 being chosen for Question 6. This inconsistency is very unhelpful to firms and is very costly and burdensome.	
2.76		
2.77		
2.78	We support EIOPA's decision to choose the option which causes least disruption to firms.	
2.79		
2.80		
Appendix 1		
Appendix 2		
Appendix 3		