

| Comments Template on Proposal for<br>Quantitative Reporting Templates for Financial Stability Purposes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                     | Deadline<br>20 February 2012 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|------------------------------|
| Name of Company: HSBC Securities Services                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                     |                              |
| Disclosure of comments:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Please indicate if your comments should be treated as confidential: | Public                       |
| <p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> <li>⇒ <u>Do not change the numbering</u> in the column “reference”; if you change numbering, your comment cannot be processed by our IT tool</li> <li>⇒ Leave the last column <u>empty</u>.</li> <li>⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph or a cell, keep the row <u>empty</u>.</li> <li>⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <ul style="list-style-type: none"> <li>○ In spreadsheets &amp; 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</li> <li>○ 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.</li> <li>○ If your comment refers to subparagraphs or specific cells within a group, please indicate this in the comment itself.</li> </ul> </li> </ul> <p><b>Please send the completed template, <u>in Word Format</u>, to <a href="mailto:cp-011@eiopa.europa.eu">cp-011@eiopa.europa.eu</a>. Our IT tool does not allow processing of any other formats.</b></p> <p>The numbering of the paragraphs refers to this Consultation Paper, the numbering of cells refers to the <u>accompanying spreadsheets and LOGs</u>.</p> |                                                                     |                              |

**Comments Template on Proposal for  
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline  
20 February 2012**

| Reference       | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |  |
|-----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| General Comment | <p>The objectives of raising this feedback are to:</p> <ol style="list-style-type: none"> <li>1) Highlight areas of asset data inconsistency, and shortfalls in required asset data content, that we anticipate will need to be resolved if Solvency II reporting is to achieve the regulatory objectives.</li> <li>2) To suggest proposals to overcome these specific data content challenges and to provide lead time for the shortfalls to be resolved.</li> <li>3) Prevent the expense and delays that would result from subsequent re-design or rebuild of the asset data content infrastructure in support of Solvency II.</li> <li>4) Avoid unnecessary costs to the industry by supplying market data only from those sources that are necessary and appropriate to achieve the regulatory objectives.</li> </ol> <p>Background</p> <p>Third Party Administrators (TPAs) have responsibilities for managing the asset data content on behalf of Insurance firms (along with the rest of the buy-side including Fund Managers, Pension funds and Hedge funds). Many large Insurance firms have outsourced their Fund Administration to TPAs.</p> <p>Data consistency between TPAs needs to be addressed for some specific gaps and differences relating to data content. For example where an Insurer has their assets administered by more than one TPA the data within Solvency II reports and results needs to be consistent. There is also potential that data supplied by TPAs in QRTs (Pillar 3) could be used within Internal/Standard models (Pillar 1).</p> <p>The future crossover of the resulting data content to Pension Funds and also other regulations (e.g. AIFMD, MIFIR, FATCA, UCITS) provides additional impetus to get these areas of data content standardised and agreed.</p> <p>Comments have been included in this comments template next to cells</p> |  |

| Comments Template on Proposal for<br>Quantitative Reporting Templates for Financial Stability Purposes |                                                                                                                                                                                                                                         | Deadline<br>20 February 2012 |
|--------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
|                                                                                                        | Assets – D1Q – cell A8<br>Assets – D1Q – cell A15<br>Assets – D1Q – cell A17<br>Assets – D1Q – cell A24<br>Assets – D2O – cell A32<br>Assets – D4 – cell A1<br><br>The comments also relate to other cells and that has been indicated. |                              |
| 3.1                                                                                                    |                                                                                                                                                                                                                                         |                              |
| 3.2                                                                                                    |                                                                                                                                                                                                                                         |                              |
| 3.3                                                                                                    |                                                                                                                                                                                                                                         |                              |
| 3.4                                                                                                    |                                                                                                                                                                                                                                         |                              |
| 3.5                                                                                                    |                                                                                                                                                                                                                                         |                              |
| 3.6                                                                                                    |                                                                                                                                                                                                                                         |                              |
| 3.7                                                                                                    |                                                                                                                                                                                                                                         |                              |
| 3.8                                                                                                    |                                                                                                                                                                                                                                         |                              |
| 4.1                                                                                                    |                                                                                                                                                                                                                                         |                              |
| 4.2                                                                                                    |                                                                                                                                                                                                                                         |                              |
| 4.3                                                                                                    |                                                                                                                                                                                                                                         |                              |
| 4.4                                                                                                    |                                                                                                                                                                                                                                         |                              |
| 4.5                                                                                                    |                                                                                                                                                                                                                                         |                              |
| 6.1                                                                                                    |                                                                                                                                                                                                                                         |                              |
| 6.2                                                                                                    |                                                                                                                                                                                                                                         |                              |
| 6.3                                                                                                    |                                                                                                                                                                                                                                         |                              |

| Comments Template on Proposal for<br>Quantitative Reporting Templates for Financial Stability Purposes |  | Deadline<br>20 February 2012 |
|--------------------------------------------------------------------------------------------------------|--|------------------------------|
| 6.4                                                                                                    |  |                              |
| 6.5                                                                                                    |  |                              |
| 6.6                                                                                                    |  |                              |
| 6.7                                                                                                    |  |                              |
| 6.8                                                                                                    |  |                              |
| 6.9                                                                                                    |  |                              |
| 6.10                                                                                                   |  |                              |
| 6.11                                                                                                   |  |                              |
| 6.12                                                                                                   |  |                              |
| 6.13                                                                                                   |  |                              |
| 6.14                                                                                                   |  |                              |
| 6.15                                                                                                   |  |                              |
| 6.16                                                                                                   |  |                              |
| 6.17                                                                                                   |  |                              |
| 6.18                                                                                                   |  |                              |
| 6.19                                                                                                   |  |                              |
| 6.20                                                                                                   |  |                              |
| 6.21                                                                                                   |  |                              |
| 6.22                                                                                                   |  |                              |
| 6.23                                                                                                   |  |                              |
| 6.24                                                                                                   |  |                              |

| Comments Template on Proposal for<br>Quantitative Reporting Templates for Financial Stability Purposes |  | Deadline<br>20 February 2012 |
|--------------------------------------------------------------------------------------------------------|--|------------------------------|
| 6.25                                                                                                   |  |                              |
| 6.26                                                                                                   |  |                              |
| 6.27                                                                                                   |  |                              |
| 6.28                                                                                                   |  |                              |
| 6.29                                                                                                   |  |                              |
| 6.30                                                                                                   |  |                              |
| 7.1                                                                                                    |  |                              |
| 7.1 Q1                                                                                                 |  |                              |
| 7.1 Q2                                                                                                 |  |                              |
| 7.1 Q3                                                                                                 |  |                              |
| 7.1 Q4                                                                                                 |  |                              |
| 7.1 Q5                                                                                                 |  |                              |
| Technical Annex                                                                                        |  |                              |
| FS 1 - A1                                                                                              |  |                              |
| FS 1 – A2                                                                                              |  |                              |
| FS 1 – A3                                                                                              |  |                              |
| FS 1 – A4                                                                                              |  |                              |

**Comments Template on Proposal for  
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline  
20 February 2012**

|                             |  |  |
|-----------------------------|--|--|
| FS 1 – A5                   |  |  |
| FS 1 – A6                   |  |  |
| FS 1 – A7                   |  |  |
| FS 1 – A8                   |  |  |
| FS 1 – A9                   |  |  |
| Overview FS Needs - all tab |  |  |
| 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 B13       |  |  |
| Cover - A1Q- cell B14       |  |  |
| Cover - A1Q- cell B15       |  |  |
| Cover - A1Q- cell B16       |  |  |
| Cover - A1Q- cell D1        |  |  |
| Cover - A1Q- cell D2        |  |  |
| Cover - A1Q- cell D3        |  |  |

Formatted: English (U.K.)

**Comments Template on Proposal for  
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline  
20 February 2012**

| Comments Template on Proposal for<br>Quantitative Reporting Templates for Financial Stability Purposes |  | Deadline<br>20 February 2012 |
|--------------------------------------------------------------------------------------------------------|--|------------------------------|
| Cover - A1Q- cell D4                                                                                   |  |                              |
| Cover - A1Q- cell D5                                                                                   |  |                              |
| Cover - A1Q- cell D6                                                                                   |  |                              |
| Cover - A1Q- cell D7                                                                                   |  |                              |
| Cover - A1Q- cell D8                                                                                   |  |                              |
| Cover - A1Q- cell D9                                                                                   |  |                              |
| Cover - A1Q- cell D10                                                                                  |  |                              |
| Cover - A1Q- cell D11                                                                                  |  |                              |
| Cover - A1Q- cell D12                                                                                  |  |                              |
| Cover - A1Q- cell D13                                                                                  |  |                              |
| Cover - A1Q- cell D14                                                                                  |  |                              |
| Cover - A1Q- cell D15                                                                                  |  |                              |
| Cover - A1Q- cell D16                                                                                  |  |                              |
| Cover - A1Q- cell H1                                                                                   |  |                              |
| Cover - A1Q- cell H2                                                                                   |  |                              |
| Cover - A1Q- cell H3                                                                                   |  |                              |
| Cover - A1Q- cell H4                                                                                   |  |                              |
| Cover - A1Q- cell H5                                                                                   |  |                              |
| Cover - A1Q- cell H6                                                                                   |  |                              |
| Cover - A1Q- cell H7                                                                                   |  |                              |
| Cover - A1Q- cell H8                                                                                   |  |                              |
| Cover - A1Q- cell H9                                                                                   |  |                              |
| Cover - A1Q- cell H10                                                                                  |  |                              |
| Cover - A1Q- cell H11                                                                                  |  |                              |
| Cover - A1Q- cell H12                                                                                  |  |                              |
| Cover - A1Q- cell H13                                                                                  |  |                              |

**Comments Template on Proposal for  
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline  
20 February 2012**

| Comments Template on Proposal for<br>Quantitative Reporting Templates for Financial Stability Purposes |  | Deadline<br>20 February 2012 |
|--------------------------------------------------------------------------------------------------------|--|------------------------------|
| Cover - A1Q- cell H14                                                                                  |  |                              |
| Cover - A1Q- cell H15                                                                                  |  |                              |
| Cover - A1Q- cell H16                                                                                  |  |                              |
| Cover - A1Q- cell H1Z                                                                                  |  |                              |
| Cover - A1Q- cell H2Z                                                                                  |  |                              |
| Cover - A1Q- cell H3Z                                                                                  |  |                              |
| Cover - A1Q- cell H4Z                                                                                  |  |                              |
| Cover - A1Q- cell H5Z                                                                                  |  |                              |
| Cover - A1Q- cell H6Z                                                                                  |  |                              |
| Cover - A1Q- cell H7Z                                                                                  |  |                              |
| Cover - A1Q- cell H8Z                                                                                  |  |                              |
| Cover - A1Q- cell H9Z                                                                                  |  |                              |
| Cover - A1Q- cell H10Z                                                                                 |  |                              |
| Cover - A1Q- cell H11Z                                                                                 |  |                              |
| Cover - A1Q- cell H12Z                                                                                 |  |                              |
| Cover - A1Q- cell H13Z                                                                                 |  |                              |
| Cover - A1Q- cell H14Z                                                                                 |  |                              |
| Cover - A1Q- cell H15Z                                                                                 |  |                              |
| Cover - A1Q- cell H16Z                                                                                 |  |                              |
| Cover - A1Q- cell H1F                                                                                  |  |                              |
| Cover - A1Q- cell H1G                                                                                  |  |                              |
| Cover - A1Q- cell I1                                                                                   |  |                              |
| Cover - A1Q- cell I2                                                                                   |  |                              |
| Cover - A1Q- cell I3                                                                                   |  |                              |
| Cover - A1Q- cell 13A                                                                                  |  |                              |
| Cover - A1Q- cell 13B                                                                                  |  |                              |

**Comments Template on Proposal for  
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline  
20 February 2012**

| Comments Template on Proposal for<br>Quantitative Reporting Templates for Financial Stability Purposes |  | Deadline<br>20 February 2012 |
|--------------------------------------------------------------------------------------------------------|--|------------------------------|
| Cover - A1Q- cell I4                                                                                   |  |                              |
| Cover - A1Q- cell I5                                                                                   |  |                              |
| Cover - A1Q- cell I6                                                                                   |  |                              |
| Cover - A1Q- cell K1                                                                                   |  |                              |
| Cover - A1Q- cell K2                                                                                   |  |                              |
| Cover - A1Q- cell K3                                                                                   |  |                              |
| Cover - A1Q- cell K3A                                                                                  |  |                              |
| Cover - A1Q- cell K3B                                                                                  |  |                              |
| Cover - A1Q- cell K4                                                                                   |  |                              |
| Cover - A1Q- cell K5                                                                                   |  |                              |
| Cover - A1Q- cell K6                                                                                   |  |                              |
| Cover - A1Q- cell N1                                                                                   |  |                              |
| Cover - A1Q- cell N2                                                                                   |  |                              |
| Cover - A1Q- cell N3                                                                                   |  |                              |
| Cover - A1Q- cell N3A                                                                                  |  |                              |
| Cover - A1Q- cell N3B                                                                                  |  |                              |
| Cover - A1Q- cell N4                                                                                   |  |                              |
| Cover - A1Q- cell N5                                                                                   |  |                              |
| Cover - A1Q- cell N6                                                                                   |  |                              |
| Cover - A1Q- cell N1Z                                                                                  |  |                              |
| Cover - A1Q- cell N2Z                                                                                  |  |                              |
| Cover - A1Q- cell N3Z                                                                                  |  |                              |
| Cover - A1Q- cell N3AZ                                                                                 |  |                              |
| Cover - A1Q- cell N3BZ                                                                                 |  |                              |
| Cover - A1Q- cell N4Z                                                                                  |  |                              |
| Cover - A1Q- cell N5Z                                                                                  |  |                              |

**Comments Template on Proposal for  
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline  
20 February 2012**

|                              |                                                                                                                                          |  |
|------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|--|
| Cover - A1Q- cell N6Z        |                                                                                                                                          |  |
| Cover - A1Q- cell R          |                                                                                                                                          |  |
| Cover - A1Q- cell S1         |                                                                                                                                          |  |
| OF - B1Q- cell A13           |                                                                                                                                          |  |
| 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           |                                                                                                                                          |  |
| MCR - B4A- cell A31          |                                                                                                                                          |  |
| MCR - B4B- cell A31          |                                                                                                                                          |  |
| 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) | Comments below for Assets – D1Q – cell A8, also relate to<br>Assets – D1Q – cell A10<br>Assets – D20 – cell A6<br>Assets – D20 – cell A7 |  |

**Comments Template on Proposal for  
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline  
20 February 2012**

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 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.
- 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.

| <b>Comments Template on Proposal for<br/>Quantitative Reporting Templates for Financial Stability Purposes</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Deadline<br/>20 February 2012</b> |
|----------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
|                                                                                                                | <p>Proposal:</p> <ul style="list-style-type: none"> <li>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.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                      |
| Assets - D1Q- cell A9 (list)                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                      |
| Assets - D1Q- cell A10 (list)                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                      |
| Assets - D1Q- cell A11 (list)                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                      |
| Assets - D1Q- cell A12 (list)                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                      |
| Assets - D1Q- cell A13 (list)                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                      |
| Assets - D1Q- cell A15 (list)                                                                                  | <p>Comments below for Assets – D1Q – cell A15, also relate to Assets – D2O – cell A11</p> <p>We believe that a consistent Complementary Identification Code (CIC) is essential to ensure greater harmonisation and transparency, and reduce risk. Accurate cross-country analysis for EIOPA will only be possible if all assets are reported using the identical CIC. If the CIC is not consistent across the industry then consolidating information will be extremely challenging and require significant effort and judgement to accurately reconcile and aggregate.</p> <p>An existing precedent is the CFI (Classification of Financial instruments - ISO 10962) which uses a similar formula to the CIC but delivers inconsistent results because the codes are sourced from three numbering agencies that are able to make their own differing interpretations for the same asset. 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.</p> <p>CIC 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.</p> |                                      |

| <b>Comments Template on Proposal for<br/>Quantitative Reporting Templates for Financial Stability Purposes</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Deadline<br/>20 February 2012</b> |
|----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
|                                                                                                                | <p>i) possible to assign centrally by numbering agency (market assets such as equity, bond, exchange traded derivatives and new CCPs for OTC derivatives);</p> <p>ii) might require additional information from Fund Manager to numbering agency (Collective Funds);</p> <p>iii) makes no sense to manage centrally (e.g. bi-lateral OTC derivatives, segregated funds)</p> <p>A uniform code for identifying securities would appear to be within the objectives of Solvency II, since it would help to draw comparisons and to identify cases where specific insurance groups had significant risk exposures. It could also help to identify risk exposures from investments within Europe as a whole, which is relevant to financial stability.</p> <p>In order for any proposed standardisation to be effective our view is:</p> <ul style="list-style-type: none"> <li>• It will be necessary for EIOPA or The European Commission to create or appoint a numbering agent for CIC, and enforce the use of the identical code for all firms.</li> <li>• A single global numbering agency would also need to be appointed so that there are consistent CICs for each asset that can be distributed identically.</li> <li>• Cross-referencing to ISIN codes would provide the means to deliver the accuracy and data integrity within Solvency II data reporting systems.</li> </ul> <p>We would be grateful for clarification from EIOPA on whether they expect CIC to be consistent across the industry, in order to achieve the required results.</p> |                                      |
| Assets - D1Q- cell A16 (list)                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                      |
| Assets - D1Q- cell A17 (list)                                                                                  | <p>Comments below for Assets – D1Q – cell A17, also relate to<br/>Assets – D1Q – cell A18<br/>Assets – D20 – cell A34<br/>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</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |

| <b>Comments Template on Proposal for<br/>Quantitative Reporting Templates for Financial Stability Purposes</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Deadline<br/>20 February 2012</b> |
|----------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
|                                                                                                                | <p>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 - D1Q- cell A18 (list)                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Assets - D1Q- cell A20 (list)                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Assets - D1Q- cell A22 (list)                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Assets - D1Q- cell A23 (list)                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
|                                                                                                                | <p>Comments below for Assets – D1Q – cell A24, also relate to Assets – D2O – cell A29</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 extensively for regulatory reporting for the Insurance industry. For example level 1 could be mapped to "Mark to Market" and levels 2 and 3 to Mark to Model".</p> |                                      |
| Assets - D1Q- cell A24 (list)                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Assets - D1Q- cell A25 (list)                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Assets - D1Q- cell A26 (list)                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Assets - D1Q- cell A28 (list)                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Assets - D1Q- cell A30 (list)                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |

**Comments Template on Proposal for  
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline  
20 February 2012**

| Comments Template on Proposal for<br>Quantitative Reporting Templates for Financial Stability Purposes |  | Deadline<br>20 February 2012 |
|--------------------------------------------------------------------------------------------------------|--|------------------------------|
| Assets - D20- cell A1                                                                                  |  |                              |
| Assets - D20- cell A2                                                                                  |  |                              |
| Assets - D20- cell A3                                                                                  |  |                              |
| Assets - D20- cell A4                                                                                  |  |                              |
| Assets - D20- cell A5                                                                                  |  |                              |
| Assets - D20- cell A6                                                                                  |  |                              |
| Assets - D20- cell A7                                                                                  |  |                              |
| Assets - D20- cell A8                                                                                  |  |                              |
| Assets - D20- cell A9                                                                                  |  |                              |
| Assets - D20- cell A10                                                                                 |  |                              |
| Assets - D20- cell A11                                                                                 |  |                              |
| Assets - D20- cell A13                                                                                 |  |                              |
| 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                                                                                 |  |                              |
| Assets - D20- cell A26                                                                                 |  |                              |
| Assets - D20- cell A27                                                                                 |  |                              |
| Assets - D20- cell A28                                                                                 |  |                              |

| <b>Comments Template on Proposal for<br/>Quantitative Reporting Templates for Financial Stability Purposes</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Deadline<br/>20 February 2012</b> |
|----------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
| Assets - D20- cell A29                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Assets - D20- cell A31                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Assets - D20- cell A32                                                                                         | <p>We would like some further clarification around 'Maximum loss under unwinding event'</p> <p>Is this the pre-defined loss which is likely to occur on the occurrence of an unwinding event or is this the difference between pre-defined loss minus actual loss made on the event ?</p>                                                                                                                                                                                                                                                                 |                                      |
| Assets - D20- cell A33                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Assets - D20- cell A34                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Assets - D20- cell A35                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Assets - D3- cell A1                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Assets - D3- cell A3                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Assets - D3- cell A4                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Assets - D3- cell A6                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Assets - D3- cell A7                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Assets - D3- cell A8                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Assets - D3- cell A15                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Assets - D4- cell A1                                                                                           | <p>Comments below for Assets – D4 – cell A1, also relate to</p> <ul style="list-style-type: none"> <li>Assets – D4 – cell A2</li> <li>Assets – D4 – cell A3</li> <li>Assets – D4 – cell A4</li> <li>Assets – D4 – cell A5</li> <li>Assets – D4 – cell A6</li> <li>Assets – D4 – cell A7</li> <li>Assets – D4 – cell A8</li> </ul> <p>This also refers to 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:</p> |                                      |

**Comments Template on Proposal for  
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline  
20 February 2012**

"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 their strict disclosure rules; Solvency II requires a significant cultural shift amongst investment managers.
- 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 override any privacy concerns.

Proposal

- 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.

**Comments Template on Proposal for  
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline  
20 February 2012**

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
|                       | <ul style="list-style-type: none"> <li>• 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).</li> <br/> <li>• For Solvency II purposes this information will need industrial scale and systematic (but tightly controlled) dissemination using data vendor solutions. Vended solutions will need to be created from scratch.</li> </ul> |  |
| Assets - D4- cell A2  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Assets - D4- cell A3  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Assets - D4- cell A4  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Assets - D4- cell A5  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Assets - D4- cell A6  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Assets - D4- cell A7  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Assets - D4- cell A8  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Assets - D5- cell A1  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Assets - D5- cell A2  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Assets - D5- cell A3  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Assets - D5- cell A4  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Assets - D5- cell A5  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Assets - D5- cell A6  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Assets - D5- cell A7  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Assets - D5- cell A8  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Assets - D5- cell A9  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Assets - D5- cell A10 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Assets - D5- cell A11 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Assets - D5- cell A12 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |

**Comments Template on Proposal for  
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline  
20 February 2012**

|                       |  |  |
|-----------------------|--|--|
| Assets - D5- cell A13 |  |  |
| Assets - D5- cell A14 |  |  |
| TP - F1Q- cell A1     |  |  |
| TP - F1Q- cell A3     |  |  |
| TP - F1Q- cell A5     |  |  |
| TP - F1Q- cell A6     |  |  |
| TP - F1Q- cell A7     |  |  |
| TP - F1Q- cell A9     |  |  |
| TP - F1Q- cell A10    |  |  |
| TP - F1Q- cell A12    |  |  |
| TP - F1Q- cell A13    |  |  |
| TP - F1Q- cell A14    |  |  |
| TP - F1Q- cell B1     |  |  |
| TP - F1Q- cell B2     |  |  |
| TP - F1Q- cell B3     |  |  |
| TP - F1Q- cell B4     |  |  |
| TP - F1Q- cell B5     |  |  |
| TP - F1Q- cell B6     |  |  |
| TP - F1Q- cell B7     |  |  |
| TP - F1Q- cell B9     |  |  |
| TP - F1Q- cell B10    |  |  |
| TP - F1Q- cell B11    |  |  |
| TP - F1Q- cell B12    |  |  |
| TP - F1Q- cell B13    |  |  |
| TP - F1Q- cell B14    |  |  |
| TP - F1Q- cell C1     |  |  |

**Comments Template on Proposal for  
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline  
20 February 2012**

|                    |  |  |
|--------------------|--|--|
| TP - F1Q- cell C2  |  |  |
| TP - F1Q- cell C3  |  |  |
| TP - F1Q- cell C4  |  |  |
| TP - F1Q- cell C5  |  |  |
| TP - F1Q- cell C6  |  |  |
| TP - F1Q- cell C7  |  |  |
| TP - F1Q- cell B9  |  |  |
| TP - F1Q- cell C10 |  |  |
| TP - F1Q- cell C11 |  |  |
| TP - F1Q- cell C12 |  |  |
| TP - F1Q- cell C13 |  |  |
| TP - F1Q- cell C14 |  |  |
| TP - F1Q- cell E1  |  |  |
| TP - F1Q- cell E2  |  |  |
| TP - F1Q- cell E4  |  |  |
| TP - F1Q- cell E6  |  |  |
| TP - F1Q- cell E7  |  |  |
| TP - F1Q- cell E9  |  |  |
| TP - F1Q- cell E10 |  |  |
| TP - F1Q- cell E12 |  |  |
| TP - F1Q- cell E13 |  |  |
| TP - F1Q- cell E14 |  |  |
| TP - F3- cell A21  |  |  |
| TP - F3- cell A30  |  |  |
| TP - E1Q- cell A11 |  |  |
| TP -E1Q- cell B11  |  |  |

**Comments Template on Proposal for  
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline  
20 February 2012**

| Comments Template on Proposal for<br>Quantitative Reporting Templates for Financial Stability Purposes |  | Deadline<br>20 February 2012 |
|--------------------------------------------------------------------------------------------------------|--|------------------------------|
| TP -E1Q- cell C11                                                                                      |  |                              |
| TP - E1Q- cell D11                                                                                     |  |                              |
| TP -E1Q- cell E11                                                                                      |  |                              |
| TP -E1Q- cell F11                                                                                      |  |                              |
| TP - E1Q- cell G11                                                                                     |  |                              |
| TP -E1Q- cell H11                                                                                      |  |                              |
| TP -E1Q- cell I11                                                                                      |  |                              |
| TP - E1Q- cell L11                                                                                     |  |                              |
| TP -E1Q- cell M11                                                                                      |  |                              |
| TP -E1Q- cell N11                                                                                      |  |                              |
| TP - E1Q- cell P11                                                                                     |  |                              |
| TP - E1Q- cell P11                                                                                     |  |                              |
| TP -E1Q- cell Q11                                                                                      |  |                              |
| TP - E1Q- cell R11                                                                                     |  |                              |
| TP - E1Q- cell <b>Q11</b>                                                                              |  |                              |
| TP - E1Q- cell A12                                                                                     |  |                              |
| TP -E1Q- cell B12                                                                                      |  |                              |
| TP -E1Q- cell C12                                                                                      |  |                              |
| TP - E1Q- cell D12                                                                                     |  |                              |
| TP -E1Q- cell E12                                                                                      |  |                              |
| TP -E1Q- cell F12                                                                                      |  |                              |
| TP - E1Q- cell G12                                                                                     |  |                              |
| TP -E1Q- cell H12                                                                                      |  |                              |
| TP -E1Q- cell I12                                                                                      |  |                              |
| TP - E1Q- cell L12                                                                                     |  |                              |
| TP -E1Q- cell M12                                                                                      |  |                              |

**Comments Template on Proposal for  
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline  
20 February 2012**

| Comments Template on Proposal for<br>Quantitative Reporting Templates for Financial Stability Purposes |  | Deadline<br>20 February 2012 |
|--------------------------------------------------------------------------------------------------------|--|------------------------------|
| TP -E1Q- cell N12                                                                                      |  |                              |
| TP - E1Q- cell O12                                                                                     |  |                              |
| TP - E1Q- cell P12                                                                                     |  |                              |
| TP -E1Q- cell Q12                                                                                      |  |                              |
| TP - E1Q- cell R12                                                                                     |  |                              |
| TP - E1Q- cell <b>Q12</b>                                                                              |  |                              |
| TP - E1Q- cell A13                                                                                     |  |                              |
| TP -E1Q- cell B13                                                                                      |  |                              |
| TP -E1Q- cell C13                                                                                      |  |                              |
| TP - E1Q- cell D13                                                                                     |  |                              |
| TP -E1Q- cell E13                                                                                      |  |                              |
| TP -E1Q- cell F13                                                                                      |  |                              |
| TP - E1Q- cell G13                                                                                     |  |                              |
| TP -E1Q- cell H13                                                                                      |  |                              |
| TP -E1Q- cell I13                                                                                      |  |                              |
| TP - E1Q- cell L13                                                                                     |  |                              |
| TP -E1Q- cell M13                                                                                      |  |                              |
| TP -E1Q- cell N13                                                                                      |  |                              |
| TP - E1Q- cell O13                                                                                     |  |                              |
| TP - E1Q- cell P13                                                                                     |  |                              |
| TP -E1Q- cell Q13                                                                                      |  |                              |
| TP - E1Q- cell R13                                                                                     |  |                              |
| TP - E1Q- cell <b>Q13</b>                                                                              |  |                              |
| Re - J2- cell H1                                                                                       |  |                              |
| Re - J2- cell X1                                                                                       |  |                              |
| Re - J2- cell Y1                                                                                       |  |                              |

**Comments Template on Proposal for  
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline  
20 February 2012**

|                   |  |  |
|-------------------|--|--|
| Re - J2- cell AG1 |  |  |
| Re - J2- cell AP1 |  |  |
| Re - J3- cell B1  |  |  |
| Re - J3- cell N1  |  |  |
| Re - J3- cell O1  |  |  |
| Re - J3- cell S1  |  |  |