

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

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

Name of Company:	Deloitte Touche Tohmatsu	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public

Please follow the following instructions for filling in the template:

- ⇒ Do **not** change the numbering in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool
- ⇒ Leave the last column empty.
- ⇒ Please fill in your comment in the relevant row. If you have no comment on a paragraph or a cell, keep the row empty.
- ⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below.
  - Certain rows represent a group of cells with similar information (ex : TP - E3- cells A17-A31-J16 for a given triangle in TP-E3)
  - Cells that refer to formulas are not mentioned in specific rows; in case you have comments on formulas, please make them in the cell "general" for the given template
  - In spreadsheets & LOGs, certain cell number may seem like they are missing (ex : going directly from cell B1 to cell B3); this is normal, as they may refer to a previously existing cell that has been deleted during informal consultations, and cell numberings have not been changed for interal consistency purposes
  - If your comment refers to multiple cells or paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other cells or paragraphs this also applies.
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**Please send the completed template, in Word Format, to**

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[cp009@eiopa.europa.eu](mailto:cp009@eiopa.europa.eu). Our IT tool does not allow processing of any other formats.

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

Reference	Comment	
General Comment	<p>There should be some organization - EIOPA, associations, local supervisor - that is responsible for local interpretation and giving explicit guidance of Pillar 3 reporting requirements considering specifics of local markets.</p> <p>We believe user friendliness of the reporting template can be further increased (visual checks and balances / variation analysis with prior reporting periods / ...). For example (1) automatic upload of figures reported in prior reporting periods which enables the users of the reporting to identify significant changes between reporting periods / (2) automatic and visual checks between balances included in different worksheets (checks on totals, automatic referencing, logic checks between cells, integration of help function including references to Solvency II guidance, ... /).</p> <p>One may also question whether there will be enough time to analyze the quarterly numbers provided by the quarterly templates, and draw meaningful conclusions before the next quarterly report comes out.</p>	
3.1		
3.2		
3.3		
3.4		

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3.5		
3.6		
4.1		
4.2		
4.3		
4.4		
4.5		
4.6		
4.7		
4.8		
4.9		
4.10		
4.11		
Technical Annex (only for inconsistencies)		
BS-C1 – General	<p>1. No row in the 'Comments Template on Draft proposal for Quantitative Reporting Templates' is foreseen with respect to 'L15C' (Subordinated liabilities not in BOF) and 'L15D' (Subordinated liabilities in BOF').</p> <p>We recommend including specific guidance in the LOG with respect to the items to be listed.</p> <p>2. We consider it useful including a reconciliation between the statutory and Solvency II</p>	

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	own funds as a standardised reporting in the quarterly reporting. This reconciliation can be shown separately whereby the different items are detailed and explained. In case of a global undertaking with an EU subgroup, IFRS may apply globally but SII will only apply to the EU subgroup, which could limit the scope of synergies and could necessitate separate programmes.	
BS-C1 – Purpose		
BS-C1 – Benefits		
BS-C1 – Costs	For smaller undertakings costs might not be in proportion to their risk profile.	
BS-C1 – Groups		
BS-C1 – Materiality	We suggest to consider additional proportionality measures aimed at the necessary content of the reporting requirements based on a materiality threshold.	
BS-C1 - Disclosure		
BS-C1 – Frequency	Whether an undertaking has to fill out the template on a quarterly basis is subject to its own interpretation as the undertakings have to assess themselves whether the information already available in the quarterly template is sufficient to explain the largest part of the reconciliation reserve. We believe clearer, non-subjective, guidelines on when to fill out the template on a quarterly basis are required.	
BS-C1 – cell AS1		
BS-C1- cell AS24		
BS-C1- cell A2	More guidance is required on the Solvency II condition that 'the intangible can be sold on the market'. Does it equal the conditions in IFRS; identifiable, controllable and econ. benefits? We consider it useful in providing specific guidance in the LOG-file on the conditions that apply for Solvency II recognition of Intangible Assets. Moreover, we also consider it useful in providing specific guidance in the LOG-file with respect to the Solvency II valuation of Intangible Assets.	
BS-C1- cell AS2		
BS-C1- cell A26	Given the fact that deferred tax items can have a significant impact on the Solvency II result (loss absorbing adjustment), it can be considered useful including a separate detail on the source of the deferred tax items.	

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BS-C1- cell AS26		
BS-C1- cell A25B		
BS-C1- cell AS25B		
BS-C1- cell A3		
BS-C1- cell AS3		
BS-C1- cell A5		
BS-C1- cell AS5		
BS-C1- cell A6		
BS-C1- cell AS6		
BS-C1- cell A7		
BS-C1- cell AS7		
BS-C1- cell A7A		
BS-C1- cell AS7A		
BS-C1- cell A8		
BS-C1- cell AS8		
BS-C1- cell A8A		
BS-C1- cell AS8A		
BS-C1- cell A8C		
BS-C1- cell AS8C		
BS-C1- cell A8D		
BS-C1- cell AS8D		
BS-C1- cell AS9		
BS-C1- cell AS9A	<p>We recommend including further clarification in how the split between the different investment funds has to be made. Investment funds often include different types of investments (fund of funds / mixed funds / ...).</p> <p>In addition we consider it useful in confirming that the application of a look through</p>	

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	approach for investment funds is not reflected directly on the balance sheet but only in the SCR calculations. Nevertheless a look through presentation (if applied) can provide useful information.	
BS-C1- cell AS9B	See comment on BS-C1- cell AS9A	
BS-C1- cell AS9C	See comment on BS-C1- cell AS9A	
BS-C1- cell AS9D	See comment on BS-C1- cell AS9A	
BS-C1- cell AS9E	See comment on BS-C1- cell AS9A	
BS-C1- cell AS9F	See comment on BS-C1- cell AS9A	
BS-C1- cell A10A		
BS-C1- cell AS10A		
BS-C1- cell A10B		
BS-C1- cell AS10B		
BS-C1- cell A14		
BS-C1- cell AS14		
BS-C1- cell A11		
BS-C1- cell AS11		
BS-C1- cell A12		
BS-C1- cell AS12		
BS-C1- cell A14A		
BS-C1- cell AS14A		
BS-C1- cell A17		
BS-C1- cell AS17		
BS-C1- cell A18		
BS-C1- cell AS18		
BS-C1- cell A18A		
BS-C1- cell AS18A		

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BS-C1- cell A19		
BS-C1- cell AS19		
BS-C1- cell A19A		
BS-C1- cell AS19A		
BS-C1- cell A13		
BS-C1- cell AS13		
BS-C1- cell A21		
BS-C1- cell AS21		
BS-C1- cell A20		
BS-C1- cell AS20		
BS-C1- cell A23		
BS-C1- cell AS23		
BS-C1- cell A27		
BS-C1- cell AS27		
BS-C1- cell A29		
BS-C1- cell AS29		
BS-C1- cell LS1		
BS-C1- cell L1A		
BS-C1- cell L2		
BS-C1- cell L3		
BS-C1- cell LS4		
BS-C1- cell L4A		
BS-C1- cell L5		
BS-C1- cell L6		
BS-C1- cell LS6B		
BS-C1- cell L6C		

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BS-C1- cell L6D		
BS-C1- cell L6E		
BS-C1- cell LS7		
BS-C1- cell L7A		
BS-C1- cell L8		
BS-C1- cell L9		
BS-C1- cell LS10		
BS-C1- cell L10A		
BS-C1- cell L11		
BS-C1- cell L12		
BS-C1- cell L23		
BS-C1- cell L18		
BS-C1- cell LS18		
BS-C1- cell L22		
BS-C1- cell LS22		
BS-C1- cell L13		
BS-C1- cell LS13		
BS-C1- cell L17	Given the fact that deferred tax items can have a significant impact on the Solvency II result (loss absorbing adjustment), it can be considered useful including a separate detail on the source of the deferred tax items (deferred tax on temporary differences, deferred tax on carry forward tax losses, ... ). Hereby in addition a split can be made between the gross amounts on which the deferred tax is calculated, deferred tax amounts.	
BS-C1- cell LS17		
BS-C1- cell L16		
BS-C1- cell LS16		
BS-C1- cell L19		

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BS-C1- cell LS19		
BS-C1- cell L20		
BS-C1- cell LS20		
BS-C1- cell L15A		
BS-C1- cell LS15A		
BS-C1- cell L15B		
BS-C1- cell LS15B		
BS-C1- cell L15C		
BS-C1- cell LS15C		
BS-C1- cell L15D		
BS-C1- cell LS15D		
BS-C1- cell L25		
BS-C1- cell LS25		
BS-C1- cell L26	We consider it useful in providing specific guidance in the LOG-file with respect to the Solvency II value of subordinated liabilities.	
BS-C1B – General	In order to obtain more detailed information it would be useful to list the different guarantees received (if exceeding a certain threshold).	
BS-C1B – Purpose		
BS-C1B – Benefits		
BS-C1B – Costs		
BS-C1B – Groups		
BS-C1B – Materiality	We recommend including a materiality threshold in the off balance sheet reporting in order to limit the reporting to relevant items.	
BS-C1B - Disclosure		
BS-C1B – Frequency		
BS-C1B- cell A2		

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BS-C1B- cell A3A		
BS-C1B- cell A3C		
BS-C1B- cell B3C		
BS-C1B- cell C3C		
BS-C1B- cell D3C		
BS-C1B- cell A3B		
BS-C1B- cell B3B		
BS-C1B- cell A10		
BS-C1B- cell B10		
BS-C1B- cell A12A		
BS-C1B- cell B12A		
BS-C1B- cell A13		
BS-C1B- cell B13		
BS-C1B- cell A13A		
BS-C1B- cell B13A		
BS-C1B- cell A14		
BS-C1B- cell B14		
BS-C1B- cell A15A		
BS-C1B- cell B15A		
BS-C1B- cell A17		
BS-C1B- cell B17		
BS-C1B- cell A17A		
BS-C1B- cell B17A		
BS-C1B- cell A18		
BS-C1B- cell A5		
BS-C1B- cell A9A		

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BS-C1B- cell A9B		
BS-C1B- cell B9B		
BS-C1B- cell C9B		
BS-C1B- cell A19		
BS-C1B- cell B19		
BS-C1D – General		
BS-C1D – Purpose		
BS-C1D – Benefits		
BS-C1D – Costs	In our opinion the costs will not significantly depend on the granularity of the balance sheet items. This reporting is based upon much more detailed data. The cost will therefore heavily depend on the availability of this information.	
BS-C1D – Groups		
BS-C1D – Materiality	Extra burden for small and mediumsized insurance undertakings outside the EURO zone which is not related to these entities’ risk profile.	
BS-C1D - Disclosure		
BS-C1D – Frequency		
BS-C1D- cell A1		
BS-C1D- cell B1		
BS-C1D- cell C1		
BS-C1D- cell D1		
BS-C1D- cell E1		
BS-C1D- cell A3		
BS-C1D- cell A4		
BS-C1D- cell A5		
BS-C1D- cell A5A		

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BS-C1D- cell A6		
BS-C1D- cell A7		
BS-C1D- cell A8		
BS-C1D- cell A9		
BS-C1D- cell A10		
BS-C1D- cell A11		
BS-C1D- cell A12		
BS-C1D- cell A13		
BS-C1D- cell A14		
BS-C1D- cell A16		
Country - K1- General	Criteria for localisation by country set out by art. 159 (based on place of underwriting) is different from the criteria set out in Cover-A1 (based on localization of risk) : governance between finance and risk organisation needs to be adequately defined and in place, so that data can retain coherence between K1 and A1.	
Country - K1- Purpose		
Country - K1- Benefits		
Country - K1- Costs		
Country - K1- Groups		
Country - K1- Materiality		
Country - K1- Disclosure	Public disclosure is no longer required. However, in order to understand the risk profile of the insurer this might be a useful information. EIOPA should ensure that this geographical spread is taken up in e.g. the SFCR report.	
Country - K1- Frequency		
Country - K1- cell A1		
Country - K1- cell A2		
Country - K1- cell A3		
Country - K1- cell A4		

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Country - K1- cell C1	We recommend this to be called claims payable instead of claims paid, as accrual base reconciles with statutory accounting.	
Country - K1- cell C2		
Country - K1- cell C3		
Country - K1- cell C4		
Country - K1- cell E1		
Country - K1- cell E2		
Country - K1- cell E3		
Country - K1- cell E4		
Country - K1- cell H1	We believe the LOG file should state that the period taken to calculate the frequency of claims in the home country has to be the same as the period taken to calculate the frequency of claims in EEA member states. This means that the period taken to calculate the frequency of claims should be explicit and consistent across reporting countries within the same organisation, e.g. Jan-Dec, May-Jun.	
Country - K1- cell H2	See comment on Country – K1 – cell E4	
Country - K1- cell H3	See comment on Country – K1 – cell E4	
Country - K1- cell H1A	See comment on Country – K1 – cell E4	
Country - K1- cell H2A	See comment on Country – K1 – cell E4	
Country - K1- cell H3A	See comment on Country – K1 – cell E4	
Cover - A1A & Q- General	We suggest to take up Claims Payable and Expenses Payable in both templates instead of Claims Paid and Expenses Paid, as accrual base aligns with statutory reporting.	
Cover - A1A & Q- Purpose		
Cover - A1A & Q- Benefits	Extra guidance is required wither smaller undertakings should report on a quarterly basis or should there be a threshold under which this would not be required?	
Cover - A1A & Q- Costs	For small and medium undertakings, producing the quarterly template will represent significant costs and resourcing constraints.	
Cover - A1A & Q- Groups		
Cover - A1A & Q-		

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Materiality		
Cover - A1A & Q-Disclosure	The quarterly template is now required to be publicly disclosed . We advise to reconsider this for small and medium undertakings as this may represent a significant mobilisation of their resources.	
Cover - A1A & Q-Frequency	See comment on Cover a A1A & Q- Disclosure	
Cover - A1A- cell A1		
Cover - A1A- cell A2		
Cover - A1A- cell A3		
Cover - A1A- cell A4		
Cover - A1A- cell A5		
Cover - A1A- cell A6		
Cover - A1A- cell A7		
Cover - A1A- cell A8		
Cover - A1A- cell A9		
Cover - A1A- cell A10		
Cover - A1A- cell A11		
Cover - A1A- cell A12		
Cover - A1A- cell A19		
Cover - A1A- cell A20		
Cover - A1A- cell A21		
Cover - A1A- cell A22		
Cover - A1A- cell A23		
Cover - A1A- cell B1		
Cover - A1A- cell B2		
Cover - A1A- cell C1		
Cover - A1A- cell A1A		

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Cover - A1A- cell B1A		
Cover - A1A- cell C1A		
Cover - A1A- cell E1		
Cover - A1A- cell F1		
Cover - A1A- cell G1		
Cover - A1A- cell E1A	The split in expenses paid may be challenging to provide for smaller undertakings – especially the differentiation between administrative and overhead costs. Therefore we suggest to provide extra guidance whether this split is required for small and medium-sized undertakings, and if not specify a threshold.	
Cover - A1A- cell F1A	The split in expenses paid may be challenging to provide for smaller undertakings – especially the differentiation between administrative and overhead costs. Therefore we suggest to provide extra guidance whether this split is required for small and medium-sized undertakings, and if not specify a threshold.	
Cover - A1A- cell G1A	The split in expenses paid may be challenging to provide for smaller undertakings – especially the differentiation between administrative and overhead costs. Therefore we suggest to provide extra guidance whether this split is required for small and medium-sized undertakings, and if not specify a threshold.	
Cover - A1A- cell E1B	The split in expenses paid may be challenging to provide for smaller undertakings.	
Cover - A1A- cell F1B	The split in expenses paid may be challenging to provide for smaller undertakings.	
Cover - A1A- cell G1B	The split in expenses paid may be challenging to provide for smaller undertakings.	
Cover - A1A- cell E1C	The split in expenses paid may be challenging to provide for smaller undertakings.	
Cover - A1A- cell F1C	The split in expenses paid may be challenging to provide for smaller undertakings.	
Cover - A1A- cell G1C	The split in expenses paid may be challenging to provide for smaller undertakings.	
Cover - A1A- cell E1D	The split in expenses paid may be challenging to provide for smaller undertakings.	
Cover - A1A- cell F1D	The split in expenses paid may be challenging to provide for smaller undertakings.	
Cover - A1A- cell G1D	The split in expenses paid may be challenging to provide for smaller undertakings.	
Cover - A1A- cell E1E	The split in expenses paid may be challenging to provide for smaller undertakings – especially the differentiation between administrative and overhead costs.	
Cover - A1A- cell F1E	The split in expenses paid may be challenging to provide for smaller undertakings –	

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	especially the differentiation between administrative and overhead costs.	
Cover - A1A- cell G1E	The split in expenses paid may be challenging to provide for smaller undertakings – especially the differentiation between administrative and overhead costs.	
Cover - A1A- cell I1		
Cover - A1A- cell I2		
Cover - A1A- cell I3		
Cover - A1A- cell I3A		
Cover - A1A- cell I3B		
Cover - A1A- cell I4		
Cover - A1A- cell I5		
Cover - A1A- cell I6		
Cover - A1A- cell I7		
Cover - A1A- cell I8		
Cover - A1A- cell I9		
Cover - A1A- cell I10		
Cover - A1A- cell I11		
Cover - A1A- cell J1		
Cover - A1A- cell I11A		
Cover - A1A- cell J1A		
Cover - A1A- cell L1		
Cover - A1A- cell M1		
Cover - A1A- cell L1A	The split in expenses paid may be challenging to provide for smaller undertakings – especially the differentiation between administrative and overhead costs. Therefore we suggest to provide extra guidance whether this split is required for small and medium-sized undertakings, and if not specify a threshold.	
Cover - A1A- cell M1A	The split in expenses paid may be challenging to provide for smaller undertakings – especially the differentiation between administrative and overhead costs. Therefore we suggest to provide extra guidance whether this split is required for small and medium-	

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	sized undertakings, and if not specify a threshold.	
Cover - A1A- cell O1	The split in expenses paid may be challenging to provide for smaller undertakings.	
Cover - A1A- cell P1	The split in expenses paid may be challenging to provide for smaller undertakings.	
Cover - A1A- cell O1A	The split in expenses paid may be challenging to provide for smaller undertakings.	
Cover - A1A- cell P1A	The split in expenses paid may be challenging to provide for smaller undertakings.	
Cover - A1A- cell O1B	The split in expenses paid may be challenging to provide for smaller undertakings.	
Cover - A1A- cell P1B	The split in expenses paid may be challenging to provide for smaller undertakings.	
Cover - A1A- cell O1C	The split in expenses paid may be challenging to provide for smaller undertakings – especially the differentiation between administrative and overhead costs. Therefore we suggest to provide extra guidance whether this split is required for small and medium-sized undertakings, and if not specify a threshold.	
Cover - A1A- cell P1C	The split in expenses paid may be challenging to provide for smaller undertakings – especially the differentiation between administrative and overhead costs. Therefore we suggest to provide extra guidance whether this split is required for small and medium-sized undertakings, and if not specify a threshold.	
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		

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Cover - A1Q- cell A19		
Cover - A1Q- cell A20		
Cover - A1Q- cell A21		
Cover - A1Q- cell A22		
Cover - A1Q- cell A23		
Cover - A1Q- cell B1		
Cover - A1Q- cell B2		
Cover - A1Q- cell C1		
Cover - A1Q- cell E1		
Cover - A1Q- cell F1		
Cover - A1Q- cell G1		
Cover - A1Q- cell E1Z		
Cover - A1Q- cell F1Z		
Cover - A1Q- cell G1Z		
Cover - A1Q- cell I1		
Cover - A1Q- cell I2		
Cover - A1Q- cell I3		
Cover - A1Q- cell I3A	The split of annuities into health and non-health is new. We recommend to consider an annual reporting to start with, and then gradually move to a semi-annually or quarterly reporting.	
Cover - A1Q- cell I3B	The split of annuities into health and non-health is new. We recommend to consider an annual reporting to start with, and then gradually move to a semi-annually or quarterly reporting.	
Cover - A1Q- cell I4		
Cover - A1Q- cell I5		
Cover - A1Q- cell I6		
Cover - A1Q- cell I7		

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Cover - A1Q- cell I8		
Cover - A1Q- cell I9		
Cover - A1Q- cell I10		
Cover - A1Q- cell I11		
Cover - A1Q- cell L1		
Cover - A1Q- cell M1		
Cover - A1Q- cell L1Z		
Cover - A1Q- cell M1Z		
OF - B1A & B1Q – General	<p><u>Overall comments:</u> There are a number of items contained in the definitions notes which need to be specified as for example ring fenced funds, related to own-funds for solo entities (OF-B1A –cell A115).</p> <p>The notion of other ancillary own funds for Tier 2 (OF – B1A –cell C42) and Tier 3 (OF – B1A –cell D42) need to be specified. Indeed, specifications need to be given regarding the mentioned legally binding commitments (contractual or strictly legal).</p> <p>The reconciliation reserve need to be calculated in the quarterly OF – B1Q. But no Economic balance sheet seems planned quarterly by EIOPA. So, which solution could be proposed by EIOPA to check the reconciliation reserve ?</p>	
OF - B1A & B1Q – Purpose		
OF - B1A & B1Q – Benefits		
OF - B1A & B1Q – Costs		
OF - B1A & B1Q – Groups		
OF - B1A & B1Q – Materiality		
OF - B1A & B1Q - Disclosure		

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OF - B1A & B1Q – Frequency		
OF - B1A- cell C1A		
OF - B1A- cell B5		
OF - B1A- cell C5		
OF - B1A- cell D5		
OF - B1A- cell B6		
OF - B1A- cell B10		
OF - B1A- cell C10		
OF - B1A- cell D10		
OF - B1A- cell B11		
OF - B1A- cell C11		
OF - B1A- cell B14		
OF - B1A- cell C14		
OF - B1A- cell B17		
OF - B1A- cell C17		
OF - B1A- cell D17		
OF - B1A- cell B18		
OF - B1A- cell C18		
OF - B1A- cell D18		
OF - B1A- cell D14		
OF - B1A- cell D11		
OF - B1A- cell D15		
OF - B1A- cell B25	This is the foreseeable dividends and distributions of the undertaking. Level 3 guidelines to be provided.	
OF - B1A- cell B30	This is the amount of Expected profits included in future premiums (EPIFP) of the life business of the undertaking. Calculation methodology to be defined precisely in Level 3	

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OF - B1A- cell B31	This is the amount of Expected profits included in future premiums (EPIFP) of the non-life. Calculation methodology to be defined precisely in Level 3	
OF - B1A- cell C33		
OF - B1A- cell C34		
OF - B1A- cell C35		
OF - B1A- cell D35		
OF - B1A- cell C36		
OF - B1A- cell D36		
OF - B1A- cell C37		
OF - B1A- cell C38		
OF - B1A- cell D38		
OF - B1A- cell C39		
OF - B1A- cell C40	Definition should be more specific about the claim for mutual insurance companies issued for a call of supplementary contributions.	
OF - B1A- cell D40		
OF - B1A- cell C41		
OF - B1A- cell D41		
OF - B1A- cell C42		
OF - B1A- cell D42		
OF - B1A- cell A45		
OF - B1A- cell A45A		
OF - B1A- cell A45B		
OF - B1A- cell B60		
OF - B1A- cell C60		
OF - B1A- cell B61		
OF - B1A- cell C61		

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OF - B1A- cell B62		
OF - B1A- cell C62		
OF - B1A- cell B64		
OF - B1A- cell C64		
OF - B1A- cell B65		
OF - B1A- cell C65		
OF - B1A- cell B70		
OF - B1A- cell C70		
OF - B1A- cell B71		
OF - B1A- cell C71		
OF - B1A- cell B73		
OF - B1A- cell C73		
OF - B1A- cell D73		
OF - B1A- cell E73		
OF - B1A- cell F73		
OF - B1A- cell B74	This is the total of undated subordinated MMA with a call option that meet the criteria for Tier 1. Lack of qualification of call option (Tier 1, 2 or 3 according to call's expiration)	
OF - B1A- cell C74	See comment on OF - B1A- cell B74	
OF - B1A- cell D74	See comment on OF - B1A- cell B74	
OF - B1A- cell E74	See comment on OF - B1A- cell B74	
OF - B1A- cell F74	See comment on OF - B1A- cell B74	
OF - B1A- cell B75		
OF - B1A- cell C75		
OF - B1A- cell D75		
OF - B1A- cell E75		

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OF - B1A- cell F75		
OF - B1A- cell A77.1		
OF - B1A- cell B77.1		
OF - B1A- cell C77.1		
OF - B1A- cell D77.1		
OF - B1A- cell E77.1		
OF - B1A- cell F77.1		
OF - B1A- cell G77.1		
OF - B1A- cell H77.1		
OF - B1A- cell I77.1		
OF - B1A- cell J77.1		
OF - B1A- cell K77.1		
OF - B1A- cell L77.1		
OF - B1A- cell M77.1		
OF - B1A- cell N77.1		
OF - B1A- cell A77.n		
OF - B1A- cell B77.n		
OF - B1A- cell C77.n		
OF - B1A- cell D77.n		
OF - B1A- cell E77.n		
OF - B1A- cell F77.n		
OF - B1A- cell G77.n		
OF - B1A- cell H77.n		
OF - B1A- cell I77.n		
OF - B1A- cell J77.n		
OF - B1A- cell K77.n		

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OF - B1A- cell L77.n		
OF - B1A- cell M77.n		
OF - B1A- cell N77.n		
OF - B1A- cell B79		
OF - B1A- cell C79		
OF - B1A- cell D79		
OF - B1A- cell E79		
OF - B1A- cell F79		
OF - B1A- cell B80		
OF - B1A- cell C80		
OF - B1A- cell D80		
OF - B1A- cell E80		
OF - B1A- cell F80		
OF - B1A- cell B81		
OF - B1A- cell C81		
OF - B1A- cell D81		
OF - B1A- cell E81		
OF - B1A- cell F81		
OF - B1A- cell B83		
OF - B1A- cell C83		
OF - B1A- cell D83		
OF - B1A- cell B84		
OF - B1A- cell C84		
OF - B1A- cell D84		
OF - B1A- cell B85		
OF - B1A- cell C85		

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OF - B1A- cell D85		
OF - B1A- cell A87.1		
OF - B1A- cell B87.1		
OF - B1A- cell C87.1		
OF - B1A- cell D87.1		
OF - B1A- cell E87.1		
OF - B1A- cell F87.1		
OF - B1A- cell G87.1		
OF - B1A- cell H87.1		
OF - B1A- cell I87.1		
OF - B1A- cell J87.1		
OF - B1A- cell K87.1		
OF - B1A- cell L87.1		
OF - B1A- cell M87.1		
OF - B1A- cell N87.1		
OF - B1A- cell A87.n		
OF - B1A- cell B87.n		
OF - B1A- cell C87.n		
OF - B1A- cell D87.n		
OF - B1A- cell E87.n		
OF - B1A- cell F87.n		
OF - B1A- cell G87.n		
OF - B1A- cell H87.n		
OF - B1A- cell I87.n		
OF - B1A- cell J87.n		
OF - B1A- cell K87.n		

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OF - B1A- cell L87.n		
OF - B1A- cell M87.n		
OF - B1A- cell N87.n		
OF - B1A- cell B88		
OF - B1A- cell C88		
OF - B1A- cell B89		
OF - B1A- cell B90		
OF - B1A- cell C90		
OF - B1A- cell B92		
OF - B1A- cell C92		
OF - B1A- cell D92		
OF - B1A- cell E92		
OF - B1A- cell F92		
OF - B1A- cell B93		
OF - B1A- cell C93		
OF - B1A- cell D93		
OF - B1A- cell E93		
OF - B1A- cell F93		
OF - B1A- cell B94		
OF - B1A- cell C94		
OF - B1A- cell D94		
OF - B1A- cell E94		
OF - B1A- cell F94		
OF - B1A- cell B96		
OF - B1A- cell C96		
OF - B1A- cell D96		

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OF - B1A- cell E96		
OF - B1A- cell B97		
OF - B1A- cell C97		
OF - B1A- cell D97		
OF - B1A- cell E97		
OF - B1A- cell B98		
OF - B1A- cell C98		
OF - B1A- cell D98		
OF - B1A- cell E98		
OF - B1A- cell A100.1		
OF - B1A- cell B100.1		
OF - B1A- cell C100.1		
OF - B1A- cell D100.1		
OF - B1A- cell E100.1		
OF - B1A- cell F100.1		
OF - B1A- cell G100.1		
OF - B1A- cell H100.1		
OF - B1A- cell I100.1		
OF - B1A- cell J100.1		
OF - B1A- cell K100.1		
OF - B1A- cell L100.1		
OF - B1A- cell M100.1		
OF - B1A- cell N100.1		
OF - B1A- cell A100.n		
OF - B1A- cell B100.n		
OF - B1A- cell C100.n		

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OF - B1A- cell D100.n		
OF - B1A- cell E100.n		
OF - B1A- cell F100.n		
OF - B1A- cell G100.n		
OF - B1A- cell H100.n		
OF - B1A- cell I100.n		
OF - B1A- cell J100.n		
OF - B1A- cell K100.n		
OF - B1A- cell L100.n		
OF - B1A- cell M100.n		
OF - B1A- cell N100.n		
OF - B1A- cell B102		
OF - B1A- cell C102		
OF - B1A- cell D102		
OF - B1A- cell B103		
OF - B1A- cell C103		
OF - B1A- cell D103		
OF - B1A- cell B104		
OF - B1A- cell C104		
OF - B1A- cell D104		
OF - B1A- cell A106.1		
OF - B1A- cell B106.1		
OF - B1A- cell C106.1		
OF - B1A- cell D106.1		
OF - B1A- cell E106.1		
OF - B1A- cell F106.1		

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

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OF - B1A- cell D109		
OF - B1A- cell B110		
OF - B1A- cell C110		
OF - B1A- cell D110		
OF - B1A- cell E110		
OF - B1A- cell B111		
OF - B1A- cell C111		
OF - B1A- cell D111		
OF - B1A- cell E111		
OF - B1A- cell A113.1		
OF - B1A- cell B113.1		
OF - B1A- cell C113.1		
OF - B1A- cell D113.1		
OF - B1A- cell E113.1		
OF - B1A- cell A113.n		
OF - B1A- cell B113.n		
OF - B1A- cell C113.n		
OF - B1A- cell D113.n		
OF - B1A- cell E113.n		
OF - B1A- cell A115.1		
OF - B1A- cell B115.1		
OF - B1A- cell D115.1		
OF - B1A- cell E115.1		
OF - B1A- cell A115.n		
OF - B1A- cell B115.n		
OF - B1A- cell D115.n		

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OF - B1A- cell E115.n		
OF - B1A- cell B116		
OF - B1A- cell D116		
OF - B1A- cell E116		
OF - B1A- cell F116		
OF - B1A- cell A130.1		
OF - B1A- cell B130.1		
OF - B1A- cell C130.1		
OF - B1A- cell D130.1		
OF - B1A- cell E130.1		
OF - B1A- cell F130.1		
OF - B1A- cell G130.1		
OF - B1A- cell H130.1		
OF - B1A- cell I130.1		
OF - B1A- cell J130.1		
OF - B1A- cell K130.1		
OF - B1A- cell L130.1		
OF - B1A- cell M130.1		
OF - B1A- cell A130.n		
OF - B1A- cell B130.n		
OF - B1A- cell C130.n		
OF - B1A- cell D130.n		
OF - B1A- cell E130.n		
OF - B1A- cell F130.n		
OF - B1A- cell G130.n		
OF - B1A- cell H130.n		

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OF - B1A- cell I130.n		
OF - B1A- cell J130.n		
OF - B1A- cell K130.n		
OF - B1A- cell L130.n		
OF - B1A- cell M130.n		
OF - B1Q- cell C1A		
OF - B1Q- cell B5		
OF - B1Q- cell C5		
OF - B1Q- cell D5		
OF - B1Q- cell B6		
OF - B1Q- cell B10		
OF - B1Q- cell C10		
OF - B1Q- cell D10		
OF - B1Q- cell B11		
OF - B1Q- cell C11		
OF - B1Q- cell B14		
OF - B1Q- cell C14		
OF - B1Q- cell B17		
OF - B1Q- cell C17		
OF - B1Q- cell D17		
OF - B1Q- cell B18		
OF - B1Q- cell C18		
OF - B1Q- cell D18		
OF - B1Q- cell D14		
OF - B1Q- cell D11		
OF - B1Q- cell D15		

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OF - B1Q- cell B25		
OF - B1Q- cell B30		
OF - B1Q- cell B31		
OF - B1Q- cell C33		
OF - B1Q- cell C34		
OF - B1Q- cell C35		
OF - B1Q- cell D35		
OF - B1Q- cell C36		
OF - B1Q- cell D36		
OF - B1Q- cell C37		
OF - B1Q- cell C38		
OF - B1Q- cell D38		
OF - B1Q- cell C39		
OF - B1Q- cell C40		
OF - B1Q- cell D40		
OF - B1Q- cell C41		
OF - B1Q- cell D41		
OF - B1Q- cell C42		
OF - B1Q- cell D42		
OF - B1Q- cell A45		
OF - B1Q- cell A45A		
OF - B1Q- cell A45B		
VA - C2A- General	<p>There are a number of items contained in the definitions notes which need to be specified as for example :</p> <ul style="list-style-type: none"> <li>- Premiums paid on contract underwritten during year N (cell VA C2C –cell A1),</li> <li>- Expenses paid, related to insurance &amp; reinsurance obligations (VA C2C –cell D1),</li> </ul>	

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VA - C2A - Purpose		
VA - C2A - Benefits		
VA - C2A - Costs		
VA - C2A - Groups		
VA - C2A - Materiality		
VA - C2A - Disclosure		
VA - C2A - Frequency		
VA - C2B- General		
VA - C2B - Purpose		
VA - C2B - Benefits		
VA - C2B - Costs		
VA - C2B - Groups		
VA - C2B - Materiality		
VA - C2B - Disclosure		
VA - C2B - Frequency		
VA C2B - cell AA2	Expenses excluding investments management expenses related to recognised insurance and reinsurance obligations (these latter being taken into account in tab VA C2C within cash flows) Is it possible to specify what does expenses include ?	
VA C2B -cell A1		
VA C2B -cell A2		
VA C2B -cell A3		
VA C2B -cell A4		
VA C2B -cell A6		
VA C2B -cell A7		
VA C2B -cell A8		

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VA C2B -cell O1		
VA C2B -cell O2		
VA C2B -cell O3		
VA - C2C- General		
VA - C2C - Purpose		
VA - C2C - Benefits		
VA - C2C - Costs		
VA - C2C - Groups		
VA - C2C - Materiality		
VA - C2C - Disclosure		
VA - C2C - Frequency		
VA C2C -cell AA5		
VA C2C -cell A1	The definition is not clear, needs to be explained more : difference between acquired and paid premiums.	
VA C2C -cell B1		
VA C2C -cell C1		
VA C2C -cell D1		
VA C2C -cell E1		
VA C2C -cell E1A		
VA C2C -cell G1		
VA C2C -cell H1		
VA C2C -cell E1A		
VA C2C -cell A2		
VA C2C -cell B2		
VA C2C -cell D2		
VA C2C -cell E2		

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VA C2C -cell G2		
VA C2C -cell A3		
VA C2C -cell B3		
VA C2C -cell C3		
VA C2C -cell A4		
VA C2C -cell B4		
VA C2C -cell C4		
VA C2C -cell D4		
VA C2C -cell E4		
VA C2C -cell E4A		
VA C2C -cell G4		
VA C2C -cell H4		
VA C2C -cell BB1		
VA C2C -cell CC1		
VA - C2D- General		
VA - C2D - Purpose		
VA - C2D - Benefits		
VA - C2D - Costs		
VA - C2D - Groups		
VA - C2D - Materiality		
VA - C2D - Disclosure		
VA - C2D - Frequency		
VA C2D -cell O2		
VA C2D -cell O3		
VA C2D -cell O4		
VA C2D -cell O6		

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VA C2D -cell O7		
VA C2D -cell O8		
VA C2D -cell O9		
VA C2D -cell O10		
VA C2D -cell O11		
VA C2D -cell O12		
SCR - B2A - General	There have been added additional information since the last draft, but all inputs should be available after a completion of the SCR calculations	
SCR - B2A - Purpose		
SCR - B2A - Benefits		
SCR - B2A - Costs		
SCR - B2A - Groups		
SCR - B2A - Materiality		
SCR - B2A - Disclosure		
SCR - B2A - Frequency		
SCR - B2A - cell A1		
SCR - B2A - cell B1		
SCR - B2A - cell A2		
SCR - B2A - cell B2		
SCR - B2A - cell A3		
SCR - B2A - cell B3		
SCR - B2A - cell A4		
SCR - B2A - cell B4		
SCR - B2A - cell A5		
SCR - B2A - cell B5=A5		

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SCR - B2A - cell A6		
SCR - B2A - cell B6		
SCR - B2A - cell A7		
SCR - B2A - cell B7=A7		
SCR - B2A - cell A8		
SCR - B2A - cell B8		
SCR - B2A - cell A9		
SCR - B2A - cell B9		
SCR - B2A - cell A11		
SCR - B2A - cell A12		
SCR - B2A - cell A13		
SCR - B2A - cell A14		
SCR - B2A - cell A14A		
SCR - B2A - cell A15A		
SCR - B2A - cell A15B		
SCR - B2A - cell A15C		
SCR - B2A - cell A16		
SCR - B2A - cell A17		
SCR - B2A - cell A18		
SCR - B2A - cell A19		
SCR - B2A - cell A20		
SCR - B2A - cell A21		
SCR - B2B - General	Level seems reasonable and input data is something that should be available after the SCR calculations	
SCR - B2B - Purpose		
SCR - B2B - Benefits		

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SCR - B2B – Costs		
SCR - B2B – Groups		
SCR - B2B – Materiality		
SCR - B2B - Disclosure		
SCR - B2B – Frequency		
SCR - B2B- cell A1.1		
SCR - B2B- cell A1A.1		
SCR - B2B- cell B1.1		
SCR - B2B- cell A1.n		
SCR - B2B- cell A1A.n		
SCR - B2B- cell B1.n		
SCR - B2B- cell B3		
SCR - B2B- cell B5		
SCR - B2B- cell B6		
SCR - B2B- cell B8		
SCR - B2C – General	Level seems reasonable and input data is something that should be available after the SCR calculations	
SCR - B2C – Purpose		
SCR - B2C – Benefits		
SCR - B2C – Costs		
SCR - B2C – Groups		
SCR - B2C – Materiality		
SCR - B2C- Disclosure		
SCR - B2C – Frequency		

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SCR - B2C- cell A1.1		
SCR - B2C- cell A1A.1		
SCR - B2C- cell B1.1		
SCR - B2C- cell A1.n		
SCR - B2C- cell A1A.n		
SCR - B2C- cell B1.n		
SCR - B2C- cell B3		
SCR - B2C- cell B5		
SCR - B2C- cell B6		
SCR - B2C- cell B7		
SCR - B2C- cell B7A		
SCR - B2C- cell B8A		
SCR - B2C- cell B8B		
SCR - B2C- cell B8C		
SCR - B2C- cell B9		
SCR - B2C- cell B10		
SCR - B2C- cell B11		
SCR - B2C- cell B13		
SCR - B2C- cell B14		
SCR - B2C- cell B15		
SCR - B3A - General	Input is available from the SCR calculation, but the additional information besides the net and gross SCR on the submodules doesn't give much extra information about the company	
SCR - B3A - Purpose		
SCR - B3A - Benefits		
SCR - B3A - Costs		

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SCR - B3A – Groups		
SCR - B3A – Materiality		
SCR - B3A - Disclosure		
SCR - B3A – Frequency		
SCR - B3A- cell CO		
SCR - B3A- cell D0		
SCR - B3A- cell A1		
SCR - B3A- cell A1A		
SCR - B3A- cell B1		
SCR - B3A- cell B1A		
SCR - B3A- cell C1		
SCR - B3A- cell B1B		
SCR - B3A- cell D1		
SCR - B3A- cell A2		
SCR - B3A- cell A2A		
SCR - B3A- cell B2		
SCR - B3A- cell B2A		
SCR - B3A- cell C2		
SCR - B3A- cell B2B		
SCR - B3A- cell D2		
SCR - B3A- cell C3		
SCR - B3A- cell D3		
SCR - B3A- cell A4		
SCR - B3A- cell A4A		
SCR - B3A- cell B4		

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SCR - B3A- cell B4A		
SCR - B3A- cell C4		
SCR - B3A- cell B4B		
SCR - B3A- cell D4		
SCR - B3A- cell A5		
SCR - B3A- cell B5		
SCR - B3A- cell A6		
SCR - B3A- cell B6		
SCR - B3A- cell A7		
SCR - B3A- cell B7		
SCR - B3A- cell A8		
SCR - B3A- cell A8A		
SCR - B3A- cell B8		
SCR - B3A- cell B8A		
SCR - B3A- cell B8B		
SCR - B3A- cell D8		
SCR - B3A- cell A9		
SCR - B3A- cell B9		
SCR - B3A- cell A10		
SCR - B3A- cell B10		
SCR - B3A- cell A11		
SCR - B3A- cell B11		
SCR - B3A- cell A12		
SCR - B3A- cell A12A		
SCR - B3A- cell B12		
SCR - B3A- cell B12A		

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SCR - B3A- cell C12		
SCR - B3A- cell B12B		
SCR - B3A- cell D12		
SCR - B3A- cell C13		
SCR - B3A- cell D13		
SCR - B3A- cell A14		
SCR - B3A- cell A14A		
SCR - B3A- cell B14		
SCR - B3A- cell B14A		
SCR - B3A- cell C14		
SCR - B3A- cell B14B		
SCR - B3A- cell D14		
SCR - B3A- cell C15		
SCR - B3A- cell D15		
SCR - B3A- cell A16		
SCR - B3A- cell A16A		
SCR - B3A- cell B16		
SCR - B3A- cell B16A		
SCR - B3A- cell C16		
SCR - B3A- cell B16B		
SCR - B3A- cell D16		
SCR - B3A- cell A17		
SCR - B3A- cell A17A		
SCR - B3A- cell B17		
SCR - B3A- cell B17A		
SCR - B3A- cell C17		

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SCR - B3A- cell B17B		
SCR - B3A- cell D17		
SCR - B3A- cell A18		
SCR - B3A- cell A18A		
SCR - B3A- cell B18		
SCR - B3A- cell B18A		
SCR - B3A- cell C18		
SCR - B3A- cell B18B		
SCR - B3A- cell D18		
SCR - B3A- cell A19		
SCR - B3A- cell A19A		
SCR - B3A- cell C19		
SCR - B3A- cell D19		
SCR - B3A- cell A20		
SCR - B3A- cell A20A		
SCR - B3A- cell C20		
SCR - B3A- cell D20		
SCR - B3A- cell A21		
SCR - B3A- cell A21A		
SCR - B3A- cell B21		
SCR - B3A- cell B21A		
SCR - B3A- cell C21		
SCR - B3A- cell B21B		
SCR - B3A- cell D21		
SCR - B3A- cell C22		
SCR - B3A- cell D22		

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SCR - B3A- cell C23		
SCR - B3A- cell D23		
SCR - B3B - General	Level seems reasonable and input data is something that should be available after the SCR calculations	
SCR - B3B - Purpose		
SCR - B3B - Benefits		
SCR - B3B - Costs		
SCR - B3B - Groups		
SCR - B3B - Materiality		
SCR - B3B - Disclosure		
SCR - B3B - Frequency		
SCR - B3B- cell A0		
SCR - B3B- cell B0		
SCR - B3B- cell A1		
SCR - B3B- cell A1A		
SCR - B3B- cell A2		
SCR - B3B- cell A3		
SCR - B3B- cell A4		
SCR - B3B- cell B6		
SCR - B3B- cell A7		
SCR - B3B- cell A8		
SCR - B3B- cell A9		
SCR - B3B- cell B9		
SCR - B3C - General		

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SCR - B3C – Purpose		
SCR - B3C – Benefits		
SCR - B3C – Costs		
SCR - B3C – Groups		
SCR - B3C – Materiality		
SCR - B3C - Disclosure		
SCR - B3C – Frequency	In the Summary document, frequency is stated as annual. However, there is a mention for the MCR templates that SCR may be calculated ad-hoc after a significant change in risk profile. There is not such a mention in the Summary document. Suggestion : modify to « Annual, unless significant changes in risk profile lead to extraordinary calculation and reporting of the SCR »	
SCR - B3C- cell A1		
SCR - B3C- cell A1A		
SCR - B3C- cell B1		
SCR - B3C- cell B1A		
SCR - B3C- cell C1		
SCR - B3C- cell B1B		
SCR - B3C- cell D1		
SCR - B3C- cell A2		
SCR - B3C- cell A2A		
SCR - B3C- cell B2		
SCR - B3C- cell B2A		
SCR - B3C- cell C2		
SCR - B3C- cell B2B		
SCR - B3C- cell D2		

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SCR - B3C- cell A3		
SCR - B3C- cell A3A		
SCR - B3C- cell B3		
SCR - B3C- cell B3A		
SCR - B3C- cell C3		
SCR - B3C- cell B3B		
SCR - B3C- cell D3		
SCR - B3C- cell C04		
SCR - B3C- cell D04		
SCR - B3C- cell A4		
SCR - B3C- cell A4A		
SCR - B3C- cell B4		
SCR - B3C- cell B4A		
SCR - B3C- cell C4		
SCR - B3C- cell B4B		
SCR - B3C- cell D4		
SCR - B3C- cell A5		
SCR - B3C- cell A5A		
SCR - B3C- cell B5		
SCR - B3C- cell B5A		
SCR - B3C- cell C5		
SCR - B3C- cell B5B		
SCR - B3C- cell D5		
SCR - B3C- cell A6		
SCR - B3C- cell A6A		
SCR - B3C- cell B6		

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SCR - B3C- cell B6A		
SCR - B3C- cell C6		
SCR - B3C- cell B6B		
SCR - B3C- cell D6		
SCR - B3C- cell A7		
SCR - B3C- cell A7A		
SCR - B3C- cell B7		
SCR - B3C- cell B7A		
SCR - B3C- cell C7		
SCR - B3C- cell B7B		
SCR - B3C- cell D7		
SCR - B3C- cell A8		
SCR - B3C- cell A8A		
SCR - B3C- cell B8		
SCR - B3C- cell B8A		
SCR - B3C- cell C8		
SCR - B3C- cell B8B		
SCR - B3C- cell D8		
SCR - B3C- cell A9		
SCR - B3C- cell A9A		
SCR - B3C- cell B9		
SCR - B3C- cell B9A		
SCR - B3C- cell C9		
SCR - B3C- cell B9B		
SCR - B3C- cell D9		
SCR - B3C- cell C10	According to the excel template, this cell is calculated by a formula. This is not as	

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	simple a formula as the other formula cells because it implies matrix multiplication (and the matrix is not shown anywhere else in the templates). Suggestion : reclassify this cell as « Data to be entered »	
SCR - B3C- cell D10	Same comment as [SCR - B3C - cell C10]	
SCR - B3C- cell C11		
SCR - B3C- cell D11		
SCR - B3C- cell A12		
SCR - B3D - General		
SCR - B3D - Purpose		
SCR - B3D - Benefits		
SCR - B3D - Costs		
SCR - B3D - Groups		
SCR - B3D - Materiality		
SCR - B3D - Disclosure		
SCR - B3D - Frequency		
SCR - B3D- cell A12		
SCR - B3D- cell A12A		
SCR - B3D- cell B12		
SCR - B3D- cell C12	Definition in the LOG could lead to a misunderstanding. Text should be extended to include the wording « subject to boundaries contract » when defining the expected present value of premiums.	
SCR - B3D- cell D12		
SCR - B3D- cell E12		
SCR - B3D- cell F12		
SCR - B3D- cell A13		

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SCR - B3D- cell A13A		
SCR - B3D- cell B13		
SCR - B3D- cell C13	Same comment as [SCR – B3D – cell C12]	
SCR - B3D- cell D13		
SCR - B3D- cell E13		
SCR - B3D- cell F13		
SCR - B3D- cell A14		
SCR - B3D- cell A14A		
SCR - B3D- cell B14		
SCR - B3D- cell C14	Same comment as [SCR – B3D – cell C12]	
SCR - B3D- cell D14		
SCR - B3D- cell E14		
SCR - B3D- cell F14		
SCR - B3D- cell A15		
SCR - B3D- cell A15A		
SCR - B3D- cell B15		
SCR - B3D- cell C15	Same comment as [SCR – B3D – cell C12]	
SCR - B3D- cell D15		
SCR - B3D- cell E15		
SCR - B3D- cell F15		
SCR - B3D- cell A16		
SCR - B3D- cell A17		
SCR - B3D- cell A18		
SCR - B3D- cell A18A		
SCR - B3D- cell B18		
SCR - B3D- cell B18A		

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SCR - B3D- cell C18		
SCR - B3D- cell A19		
SCR - B3D- cell A20		
SCR - B3D- cell A21		
SCR - B3D- cell A22		
SCR - B3D- cell A23		
SCR - B3D- cell A24		
SCR - B3D- cell A25		
SCR - B3D- cell A26		
SCR - B3D- cell A27		
SCR - B3E – General		
SCR - B3E – Purpose		
SCR - B3E – Benefits		
SCR - B3E – Costs		
SCR - B3E – Groups		
SCR - B3E – Materiality		
SCR - B3E - Disclosure		
SCR - B3E – Frequency		
SCR - B3E- cell A1		
SCR - B3E- cell A1A		
SCR - B3E- cell B1		
SCR - B3E- cell C1	Same comment as [SCR – B3D – cell C12]	
SCR - B3E- cell D1		
SCR - B3E- cell E1		

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SCR - B3E- cell F1		
SCR - B3E- cell A2		
SCR - B3E- cell A2A		
SCR - B3E- cell B2		
SCR - B3E- cell C2	Same comment as [SCR - B3D - cell C12]	
SCR - B3E- cell D2		
SCR - B3E- cell E2		
SCR - B3E- cell F2		
SCR - B3E- cell A3		
SCR - B3E- cell A3A		
SCR - B3E- cell B3		
SCR - B3E- cell C3	Same comment as [SCR - B3D - cell C12]	
SCR - B3E- cell D3		
SCR - B3E- cell E3		
SCR - B3E- cell F3		
SCR - B3E- cell A4		
SCR - B3E- cell A4A		
SCR - B3E- cell B4		
SCR - B3E- cell C4	Same comment as [SCR - B3D - cell C12]	
SCR - B3E- cell D4		
SCR - B3E- cell E4		
SCR - B3E- cell F4		
SCR - B3E- cell A5		
SCR - B3E- cell A5A		
SCR - B3E- cell B5		
SCR - B3E- cell C5	Same comment as [SCR - B3D - cell C12]	

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SCR - B3E- cell D5		
SCR - B3E- cell E5		
SCR - B3E- cell F5		
SCR - B3E- cell A6		
SCR - B3E- cell A6A		
SCR - B3E- cell B6		
SCR - B3E- cell C6	Same comment as [SCR - B3D - cell C12]	
SCR - B3E- cell D6		
SCR - B3E- cell E6		
SCR - B3E- cell F6		
SCR - B3E- cell A7		
SCR - B3E- cell A7A		
SCR - B3E- cell B7		
SCR - B3E- cell C7	Same comment as [SCR - B3D - cell C12]	
SCR - B3E- cell D7		
SCR - B3E- cell E7		
SCR - B3E- cell F7		
SCR - B3E- cell A8		
SCR - B3E- cell A8A		
SCR - B3E- cell B8		
SCR - B3E- cell C8	Same comment as [SCR - B3D - cell C12]	
SCR - B3E- cell D8		
SCR - B3E- cell E8		
SCR - B3E- cell F8		
SCR - B3E- cell A9		
SCR - B3E- cell A9A		

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SCR - B3E- cell B9		
SCR - B3E- cell C9	Same comment as [SCR - B3D - cell C12]	
SCR - B3E- cell D9		
SCR - B3E- cell E9		
SCR - B3E- cell F9		
SCR - B3E- cell A10		
SCR - B3E- cell A10A		
SCR - B3E- cell B10		
SCR - B3E- cell C10	Same comment as [SCR - B3D - cell C12]	
SCR - B3E- cell D10		
SCR - B3E- cell E10		
SCR - B3E- cell F10		
SCR - B3E- cell A11		
SCR - B3E- cell A11A		
SCR - B3E- cell B11		
SCR - B3E- cell C11	Same comment as [SCR - B3D - cell C12]	
SCR - B3E- cell D11		
SCR - B3E- cell E11		
SCR - B3E- cell F11		
SCR - B3E- cell A12		
SCR - B3E- cell A12A		
SCR - B3E- cell B12		
SCR - B3E- cell C12	Same comment as [SCR - B3D - cell C12]	
SCR - B3E- cell D12		
SCR - B3E- cell E12		
SCR - B3E- cell F12		

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SCR - B3E- cell A13		
SCR - B3E- cell A14		
SCR - B3E- cell A15		
SCR - B3E- cell A15A		
SCR - B3E- cell B15		
SCR - B3E- cell B15A		
SCR - B3E- cell C15		
SCR - B3E- cell A16		
SCR - B3E- cell A17		
SCR - B3E- cell A18		
SCR - B3F – General		
SCR - B3F – Purpose		
SCR - B3F – Benefits		
SCR - B3F – Costs		
SCR - B3F – Groups		
SCR - B3F – Materiality		
SCR - B3F - Disclosure		
SCR - B3F – Frequency		
SCR - B3F- cell Summary A1		
SCR - B3F- cell Summary C1		
SCR - B3F- cell Summary A9		
SCR - B3F- cell Summary C9		

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SCR - B3F- cell Summary A17		
SCR - B3F- cell Summary C17		
SCR - B3F- cell Summary A26		
SCR - B3F- cell Summary C26		
SCR - B3F- cell Summary A27		
SCR - B3F- cell Summary C27		
SCR - B3F- cell Windstorm A1		
SCR - B3F- cell Windstorm B1		
SCR - B3F- cell Windstorm C1		
SCR - B3F- cell Windstorm E1		
SCR - B3F- cell Windstorm F1		
SCR - B3F- cell Windstorm G1		
SCR - B3F- cell Windstorm H1		
SCR - B3F- cell Windstorm A2		
SCR - B3F- cell Windstorm B2		
SCR - B3F- cell Windstorm C2		

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SCR - B3F- cell Windstorm E2		
SCR - B3F- cell Windstorm F2		
SCR - B3F- cell Windstorm G2		
SCR - B3F- cell Windstorm H2		
SCR - B3F- cell Windstorm A3		
SCR - B3F- cell Windstorm B3		
SCR - B3F- cell Windstorm C3		
SCR - B3F- cell Windstorm E3		
SCR - B3F- cell Windstorm F3		
SCR - B3F- cell Windstorm G3		
SCR - B3F- cell Windstorm H3		
SCR - B3F- cell Windstorm A20		
SCR - B3F- cell Windstorm B20		
SCR - B3F- cell Windstorm C20		
SCR - B3F- cell Windstorm E20		
SCR - B3F- cell Windstorm F20		

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SCR - B3F- cell Windstorm G20		
SCR - B3F- cell Windstorm H20		
SCR - B3F- cell Windstorm A22		
SCR - B3F- cell Windstorm F22		
SCR - B3F- cell Windstorm G22		
SCR - B3F- cell Windstorm H22		
SCR - B3F- cell Windstorm I22		
SCR - B3F- cell Windstorm F25		
SCR - B3F- cell Windstorm I25		
SCR - B3F- cell Earthquake A1		
SCR - B3F- cell Earthquake B1		
SCR - B3F- cell Earthquake C1		
SCR - B3F- cell Earthquake E1		
SCR - B3F- cell Earthquake F1		
SCR - B3F- cell Earthquake G1		
SCR - B3F- cell Earthquake A2		

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SCR - B3F- cell Earthquake B2		
SCR - B3F- cell Earthquake C2		
SCR - B3F- cell Earthquake E2		
SCR - B3F- cell Earthquake F2		
SCR - B3F- cell Earthquake G2		
SCR - B3F- cell Earthquake A3		
SCR - B3F- cell Earthquake B3		
SCR - B3F- cell Earthquake C3		
SCR - B3F- cell Earthquake E3		
SCR - B3F- cell Earthquake F3		
SCR - B3F- cell Earthquake G3		
SCR - B3F- cell Earthquake A20		
SCR - B3F- cell Earthquake B20		
SCR - B3F- cell Earthquake C20		
SCR - B3F- cell Earthquake E20		
SCR - B3F- cell Earthquake F20		

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SCR - B3F- cell Earthquake G20		
SCR - B3F- cell Earthquake A22		
SCR - B3F- cell Earthquake E22		
SCR - B3F- cell Earthquake F22		
SCR - B3F- cell Earthquake G22		
SCR - B3F- cell Earthquake H22		
SCR - B3F- cell Earthquake E25		
SCR - B3F- cell Earthquake H25		
SCR - B3F- cell Flood A1		
SCR - B3F- cell Flood B1		
SCR - B3F- cell Flood C1		
SCR - B3F- cell Flood E1		
SCR - B3F- cell Flood F1		
SCR - B3F- cell Flood G1		
SCR - B3F- cell Flood H1		
SCR - B3F- cell Flood A2		
SCR - B3F- cell Flood B2		
SCR - B3F- cell Flood C2		
SCR - B3F- cell Flood E2		
SCR - B3F- cell Flood F2		
SCR - B3F- cell Flood G2		

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SCR - B3F- cell Flood H2		
SCR - B3F- cell Flood A3		
SCR - B3F- cell Flood B3		
SCR - B3F- cell Flood C3		
SCR - B3F- cell Flood E3		
SCR - B3F- cell Flood F3		
SCR - B3F- cell Flood G3		
SCR - B3F- cell Flood H3		
SCR - B3F- cell Flood A20		
SCR - B3F- cell Flood B20		
SCR - B3F- cell Flood C20		
SCR - B3F- cell Flood E20		
SCR - B3F- cell Flood F20		
SCR - B3F- cell Flood G20		
SCR - B3F- cell Flood H20		
SCR - B3F- cell Flood A22		
SCR - B3F- cell Flood F22		
SCR - B3F- cell Flood G22		
SCR - B3F- cell Flood H22		
SCR - B3F- cell Flood I22		
SCR - B3F- cell Flood F25		
SCR - B3F- cell Flood I25		
SCR - B3F- cell Hail A1		
SCR - B3F- cell Hail B1		
SCR - B3F- cell Hail C1		
SCR - B3F- cell Hail E1		

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SCR - B3F- cell Hail F1		
SCR - B3F- cell Hail G1		
SCR - B3F- cell Hail H1		
SCR - B3F- cell Hail A2		
SCR - B3F- cell Hail B2		
SCR - B3F- cell Hail C2		
SCR - B3F- cell Hail E2		
SCR - B3F- cell Hail F2		
SCR - B3F- cell Hail G2		
SCR - B3F- cell Hail H2		
SCR - B3F- cell Hail A3		
SCR - B3F- cell Hail B3		
SCR - B3F- cell Hail C3		
SCR - B3F- cell Hail E3		
SCR - B3F- cell Hail F3		
SCR - B3F- cell Hail G3		
SCR - B3F- cell Hail H3		
SCR - B3F- cell Hail A20		
SCR - B3F- cell Hail B20		
SCR - B3F- cell Hail C20		
SCR - B3F- cell Hail E20		
SCR - B3F- cell Hail F20		
SCR - B3F- cell Hail G20		
SCR - B3F- cell Hail H20		
SCR - B3F- cell Hail A22		
SCR - B3F- cell Hail F22		

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SCR - B3F- cell Hail G22		
SCR - B3F- cell Hail H22		
SCR - B3F- cell Hail I22		
SCR - B3F- cell Hail F25		
SCR - B3F- cell Hail I25		
SCR - B3F- cell Subsidence A1		
SCR - B3F- cell Subsidence B1		
SCR - B3F- cell Subsidence C1		
SCR - B3F- cell Subsidence F1		
SCR - B3F- cell Subsidence G1		
SCR - B3F- cell Subsidence H1		
SCR - B3F- cell Subsidence E3		
SCR - B3F- cell Subsidence H3		
SCR - B3F- cell Non-proportional property reinsurance A1		
SCR - B3F- cell Non-proportional property reinsurance B1		
SCR - B3F- cell Non-proportional property reinsurance C1		
SCR - B3F- cell Non-		

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proportional property reinsurance D1		
SCR - B3F- cell Motor Vehicle Liability A1		
SCR - B3F- cell Motor Vehicle Liability A2		
SCR - B3F- cell Motor Vehicle Liability A3		
SCR - B3F- cell Motor Vehicle Liability A4		
SCR - B3F- cell Motor Vehicle Liability A5		
SCR - B3F- cell Marine Tanker Collision A1		
SCR - B3F- cell Marine Tanker Collision B1		
SCR - B3F- cell Marine Tanker Collision C1		
SCR - B3F- cell Marine Tanker Collision A2		
SCR - B3F- cell Marine Tanker Collision B2		
SCR - B3F- cell Marine Tanker Collision C2		
SCR - B3F- cell Marine Tanker Collision A3		
SCR - B3F- cell Marine Tanker Collision B3		
SCR - B3F- cell Marine Tanker Collision C3		
SCR - B3F- cell Marine Platform Explosion A5		

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SCR - B3F- cell Marine Platform Explosion B5		
SCR - B3F- cell Marine Platform Explosion C5		
SCR - B3F- cell Marine Platform Explosion D5		
SCR - B3F- cell Marine Platform Explosion E5		
SCR - B3F- cell Marine Platform Explosion A6		
SCR - B3F- cell Marine Platform Explosion B6		
SCR - B3F- cell Marine Platform Explosion C6		
SCR - B3F- cell Marine Platform Explosion D6		
SCR - B3F- cell Marine Platform Explosion E6		
SCR - B3F- cell Marine Platform Explosion A7		
SCR - B3F- cell Marine Platform Explosion B7		
SCR - B3F- cell Marine Platform Explosion C7		
SCR - B3F- cell Marine Platform Explosion D7		
SCR - B3F- cell Marine Platform Explosion E7		
SCR - B3F- cell Marine C9		
SCR - B3F- cell Marine C11		
SCR - B3F- cell Aviation A1		

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SCR - B3F- cell Aviation B1		
SCR - B3F- cell Aviation A2		
SCR - B3F- cell Aviation B2		
SCR - B3F- cell Aviation A3		
SCR - B3F- cell Aviation B3		
SCR - B3F- cell Fire A1		
SCR - B3F- cell Fire A2		
SCR - B3F- cell Fire A3		
SCR - B3F- cell Liability A1		
SCR - B3F- cell Liability B1		
SCR - B3F- cell Liability C1		
SCR - B3F- cell Liability D1		
SCR - B3F- cell Liability E1		
SCR - B3F- cell Liability A2		
SCR - B3F- cell Liability B2		
SCR - B3F- cell Liability C2		
SCR - B3F- cell Liability D2		
SCR - B3F- cell Liability E2		
SCR - B3F- cell Liability A3		
SCR - B3F- cell Liability B3		
SCR - B3F- cell Liability C3		
SCR - B3F- cell Liability D3		
SCR - B3F- cell Liability E3		
SCR - B3F- cell Liability A4		
SCR - B3F- cell Liability B4		
SCR - B3F- cell Liability C4		

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SCR - B3F- cell Liability D4		
SCR - B3F- cell Liability E4		
SCR - B3F- cell Liability A1		
SCR - B3F- cell Liability A5		
SCR - B3F- cell Liability B5		
SCR - B3F- cell Liability C5		
SCR - B3F- cell Liability D5		
SCR - B3F- cell Liability E5		
SCR - B3F- cell Liability A6		
SCR - B3F- cell Liability B6		
SCR - B3F- cell Liability C6		
SCR - B3F- cell Liability D6		
SCR - B3F- cell Liability E6		
SCR - B3F- cell Liability A8		
SCR - B3F- cell Liability B8		
SCR - B3F- cell Liability C8		
SCR - B3F- cell Liability D8		
SCR - B3F- cell Liability E8		
SCR - B3F- cell Liability A9		
SCR - B3F- cell Liability B9		
SCR - B3F- cell Liability C9		
SCR - B3F- cell Liability D9		
SCR - B3F- cell Liability E9		
SCR - B3F- cell Liability A10		
SCR - B3F- cell Liability B10		
SCR - B3F- cell Liability C10		

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SCR - B3F- cell Liability D10		
SCR - B3F- cell Liability E10		
SCR - B3F- cell Liability A12		
SCR - B3F- cell Liability B12		
SCR - B3F- cell Liability C12		
SCR - B3F- cell Liability D12		
SCR - B3F- cell Liability E12		
SCR - B3F- cell Liability H12		
SCR - B3F- cell Liability A14		
SCR - B3F- cell Liability B14		
SCR - B3F- cell Liability C14		
SCR - B3F- cell Liability D14		
SCR - B3F- cell Liability E14		
SCR - B3F- cell Liability H14		
SCR - B3F- cell Credit & Suretyship Large Credit Default A1		
SCR - B3F- cell Credit & Suretyship Large Credit Default B1		
SCR - B3F- cell Credit & Suretyship Large Credit Default A2		
SCR - B3F- cell Credit & Suretyship Large Credit		

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Default B2		
SCR - B3F- cell Credit & Suretyship Large Credit Default A4		
SCR - B3F- cell Credit & Suretyship Large Credit Default B4		
SCR - B3F- cell Credit & Suretyship Large Credit Default A5		
SCR - B3F- cell Credit & Suretyship Large Credit Default B5		
SCR - B3F- cell Credit & Suretyship Recession Risk A7		
SCR - B3F- cell Credit & Suretyship Recession Risk A8		
SCR - B3F- cell Credit & Suretyship Recession Risk A9		
SCR - B3F- cell Credit & Suretyship Recession Risk A10		
SCR - B3F- cell Credit & Suretyship C12		
SCR - B3F- cell Credit & Suretyship C14		
SCR - B3F- cell Other non-life catastrophe risk A1		
SCR - B3F- cell Other non-		

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life catastrophe risk B1		
SCR - B3F- cell Other non-life catastrophe risk C1		
SCR - B3F- cell Other non-life catastrophe risk D1		
SCR - B3F- cell Other non-life catastrophe risk E1		
SCR - B3F- cell Other non-life catastrophe risk A2		
SCR - B3F- cell Other non-life catastrophe risk B2		
SCR - B3F- cell Other non-life catastrophe risk C2		
SCR - B3F- cell Other non-life catastrophe risk D2		
SCR - B3F- cell Other non-life catastrophe risk E2		
SCR - B3F- cell Other non-life catastrophe risk H2		
SCR - B3F- cell Other non-life catastrophe risk A4		
SCR - B3F- cell Other non-life catastrophe risk B4		
SCR - B3F- cell Other non-life catastrophe risk C4		
SCR - B3F- cell Other non-life catastrophe risk D4		
SCR - B3F- cell Other non-life catastrophe risk E4		
SCR - B3F- cell Other non-life catastrophe risk H4		
SCR - B3F- cell Mass		

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Accident A1		
SCR - B3F- cell Mass Accident B1		
SCR - B3F- cell Mass Accident C1		
SCR - B3F- cell Mass Accident D1		
SCR - B3F- cell Mass Accident E1		
SCR - B3F- cell Mass Accident F1		
SCR - B3F- cell Mass Accident G1		
SCR - B3F- cell Mass Accident H1		
SCR - B3F- cell Mass Accident I1		
SCR - B3F- cell Mass Accident J1		
SCR - B3F- cell Mass Accident K1		
SCR - B3F- cell Mass Accident L1		
SCR - B3F- cell Mass Accident M1		
SCR - B3F- cell Mass Accident A2		
SCR - B3F- cell Mass Accident B2		
SCR - B3F- cell Mass Accident C2		
SCR - B3F- cell Mass		

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Accident D2		
SCR - B3F- cell Mass Accident E2		
SCR - B3F- cell Mass Accident F2		
SCR - B3F- cell Mass Accident G2		
SCR - B3F- cell Mass Accident H2		
SCR - B3F- cell Mass Accident I2		
SCR - B3F- cell Mass Accident J2		
SCR - B3F- cell Mass Accident K2		
SCR - B3F- cell Mass Accident L2		
SCR - B3F- cell Mass Accident M2		
SCR - B3F- cell Mass Accident A3		
SCR - B3F- cell Mass Accident B3		
SCR - B3F- cell Mass Accident C3		
SCR - B3F- cell Mass Accident D3		
SCR - B3F- cell Mass Accident E3		
SCR - B3F- cell Mass Accident F3		
SCR - B3F- cell Mass		

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Accident G3		
SCR - B3F- cell Mass Accident H3		
SCR - B3F- cell Mass Accident I3		
SCR - B3F- cell Mass Accident J3		
SCR - B3F- cell Mass Accident K3		
SCR - B3F- cell Mass Accident L3		
SCR - B3F- cell Mass Accident M3		
SCR - B3F- cell Mass Accident A20		
SCR - B3F- cell Mass Accident B20		
SCR - B3F- cell Mass Accident C20		
SCR - B3F- cell Mass Accident D20		
SCR - B3F- cell Mass Accident E20		
SCR - B3F- cell Mass Accident F20		
SCR - B3F- cell Mass Accident G20		
SCR - B3F- cell Mass Accident H20		
SCR - B3F- cell Mass Accident I20		
SCR - B3F- cell Mass		

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Accident J20		
SCR - B3F- cell Mass Accident K20		
SCR - B3F- cell Mass Accident L20		
SCR - B3F- cell Mass Accident M20		
SCR - B3F- cell Mass Accident K22		
SCR - B3F- cell Mass Accident N22		
SCR - B3F- cell Concentration Accident A1		
SCR - B3F- cell Concentration Accident B1		
SCR - B3F- cell Concentration Accident C1		
SCR - B3F- cell Concentration Accident D1		
SCR - B3F- cell Concentration Accident E1		
SCR - B3F- cell Concentration Accident F1		
SCR - B3F- cell Concentration Accident G1		
SCR - B3F- cell Concentration Accident H1		
SCR - B3F- cell Concentration Accident I1		
SCR - B3F- cell Concentration Accident A2		
SCR - B3F- cell		

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Concentration Accident B2		
SCR - B3F- cell Concentration Accident C2		
SCR - B3F- cell Concentration Accident D2		
SCR - B3F- cell Concentration Accident E2		
SCR - B3F- cell Concentration Accident F2		
SCR - B3F- cell Concentration Accident G2		
SCR - B3F- cell Concentration Accident H2		
SCR - B3F- cell Concentration Accident I2		
SCR - B3F- cell Concentration Accident A3		
SCR - B3F- cell Concentration Accident B3		
SCR - B3F- cell Concentration Accident C3		
SCR - B3F- cell Concentration Accident D3		
SCR - B3F- cell Concentration Accident E3		
SCR - B3F- cell Concentration Accident F3		
SCR - B3F- cell Concentration Accident G3		
SCR - B3F- cell Concentration Accident H3		
SCR - B3F- cell		

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Concentration Accident I3		
SCR - B3F- cell Concentration Accident A20		
SCR - B3F- cell Concentration Accident B20		
SCR - B3F- cell Concentration Accident C20		
SCR - B3F- cell Concentration Accident D20		
SCR - B3F- cell Concentration Accident E20		
SCR - B3F- cell Concentration Accident F20		
SCR - B3F- cell Concentration Accident G20		
SCR - B3F- cell Concentration Accident H20		
SCR - B3F- cell Concentration Accident I20		
SCR - B3F- cell Concentration Accident G22		
SCR - B3F- cell Concentration Accident J22		
SCR - B3F- cell Pandemic A1		
SCR - B3F- cell Pandemic B1		
SCR - B3F- cell Pandemic C1		
SCR - B3F- cell Pandemic D1		
SCR - B3F- cell Pandemic		

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E1		
SCR - B3F- cell Pandemic F1		
SCR - B3F- cell Pandemic A2		
SCR - B3F- cell Pandemic B2		
SCR - B3F- cell Pandemic C2		
SCR - B3F- cell Pandemic D2		
SCR - B3F- cell Pandemic E2		
SCR - B3F- cell Pandemic F2		
SCR - B3F- cell Pandemic A3		
SCR - B3F- cell Pandemic B3		
SCR - B3F- cell Pandemic C3		
SCR - B3F- cell Pandemic D3		
SCR - B3F- cell Pandemic E3		
SCR - B3F- cell Pandemic F2		
SCR - B3F- cell Pandemic A20		
SCR - B3F- cell Pandemic B20		
SCR - B3F- cell Pandemic		

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C20		
SCR - B3F- cell Pandemic D20		
SCR - B3F- cell Pandemic E20		
SCR - B3F- cell Pandemic F20		
SCR - B3F- cell Pandemic F21		
SCR - B3F- cell Pandemic D22		
SCR - B3F- cell Pandemic G22		
SCR - B3G – General	Level seems reasonable and input data is something that should be available after the SCR calculations	
SCR - B3G – Purpose		
SCR - B3G – Benefits		
SCR - B3G – Costs		
SCR - B3G – Groups		
SCR - B3G – Materiality		
SCR - B3G - Disclosure		
SCR - B3G – Frequency		
SCR - B3G- cell A1		
SCR - B3G- cell A2		
SCR - B3G- cell A3		
SCR - B3G- cell A4		
SCR - B3G- cell A5		

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SCR - B3G- cell A6		
SCR - B3G- cell A7		
SCR - B3G- cell A8		
SCR - B3G- cell A9		
SCR - B3G- cell A10		
SCR - B3G- cell A11		
SCR - B3G- cell A12		
SCR - B3G- cell A13		
SCR - B3G- cell A14		
SCR - B3G- cell A15		
SCR - B3G- cell A16		
MCR - B4A & B4B – General	<p>It is not completely clear reading the summary document whether undertakings on internal models and requested to additionally provide SCR using standard formula should :</p> <ul style="list-style-type: none"> <li>- Refer to IM SCR to calculate the cap/floor ;</li> <li>- Refer to SF SCR to calculate the cap/floor ;</li> <li>- Report this template twice, one using IM SCR and one using SF SCR.</li> </ul> <p>Same comment repeated on specific cell [MCR – B4A &amp; B4B A25]</p>	
MCR - B4A & B4B – Purpose		
MCR - B4A & B4B – Benefits		
MCR - B4A & B4B – Costs		
MCR - B4A & B4B – Groups		
MCR - B4A & B4B – Materiality		
MCR - B4A & B4B - Disclosure		

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MCR - B4A & B4B - Frequency		
MCR - B4A- cell A1		
MCR - B4A- cell B2		
MCR - B4A- cell C2		
MCR - B4A- cell B3		
MCR - B4A- cell C3		
MCR - B4A- cell B4		
MCR - B4A- cell C4		
MCR - B4A- cell B5		
MCR - B4A- cell C5		
MCR - B4A- cell B6		
MCR - B4A- cell C6		
MCR - B4A- cell B7		
MCR - B4A- cell C7		
MCR - B4A- cell B8		
MCR - B4A- cell C8		
MCR - B4A- cell B9		
MCR - B4A- cell C9		
MCR - B4A- cell B10		
MCR - B4A- cell C10		
MCR - B4A- cell B11		
MCR - B4A- cell C11		
MCR - B4A- cell B12		
MCR - B4A- cell C12		
MCR - B4A- cell B13		

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MCR - B4A- cell C13		
MCR - B4A- cell B14		
MCR - B4A- cell C14		
MCR - B4A- cell B15		
MCR - B4A- cell C15		
MCR - B4A- cell B16		
MCR - B4A- cell C16		
MCR - B4A- cell B17		
MCR - B4A- cell C17		
MCR - B4A- cell A18		
MCR - B4A- cell B19		
MCR - B4A- cell B20		
MCR - B4A- cell B21		
MCR - B4A- cell B22		
MCR - B4A- cell C23		
MCR - B4A- cell A24		
	<p>It is not completely clear reading the summary document whether undertakings on internal models and requested to additionally provide SCR using standard formula should :</p> <ul style="list-style-type: none"> <li>- Refer to IM SCR to calculate the cap/floor ;</li> <li>- Refer to SF SCR to calculate the cap/floor ;</li> <li>- Report this template twice, one using IM SCR and one using SF SCR.</li> </ul>	
MCR - B4A- cell A25		
MCR - B4A- cell A26		
MCR - B4A- cell A27		
MCR - B4A- cell A28		
MCR - B4A- cell A29		

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MCR - B4A- cell A30		
MCR - B4A- cell A31		
MCR - B4B- cell B1		
MCR - B4B- cell C1		
MCR - B4B- cell D2		
MCR - B4B- cell E2		
MCR - B4B- cell F2		
MCR - B4B- cell G2		
MCR - B4B- cell D3		
MCR - B4B- cell E3		
MCR - B4B- cell F3		
MCR - B4B- cell G3		
MCR - B4B- cell D4		
MCR - B4B- cell E4		
MCR - B4B- cell F4		
MCR - B4B- cell G4		
MCR - B4B- cell D5		
MCR - B4B- cell E5		
MCR - B4B- cell F5		
MCR - B4B- cell G5		
MCR - B4B- cell D6		
MCR - B4B- cell E6		
MCR - B4B- cell F6		
MCR - B4B- cell G6		
MCR - B4B- cell D7		
MCR - B4B- cell E7		

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

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MCR - B4B- cell D14		
MCR - B4B- cell E14		
MCR - B4B- cell F14		
MCR - B4B- cell G14		
MCR - B4B- cell D15		
MCR - B4B- cell E15		
MCR - B4B- cell F15		
MCR - B4B- cell G15		
MCR - B4B- cell D16		
MCR - B4B- cell E16		
MCR - B4B- cell F16		
MCR - B4B- cell G16		
MCR - B4B- cell D17		
MCR - B4B- cell E17		
MCR - B4B- cell F17		
MCR - B4B- cell G17		
MCR - B4B- cell B18		
MCR - B4B- cell C18		
MCR - B4B- cell D19		
MCR - B4B- cell F19		
MCR - B4B- cell D20		
MCR - B4B- cell F20		
MCR - B4B- cell D21		
MCR - B4B- cell F21		
MCR - B4B- cell D22		
MCR - B4B- cell F22		

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MCR - B4B- cell E23		
MCR - B4B- cell G23		
MCR - B4B- cell A24		
	<p>It is not completely clear reading the summary document whether undertakings on internal models and requested to additionally provide SCR using standard formula should :</p> <ul style="list-style-type: none"> <li>- Refer to IM SCR to calculate the cap/floor ;</li> <li>- Refer to SF SCR to calculate the cap/floor ;</li> <li>- Report this template twice, one using IM SCR and one using SF SCR.</li> </ul>	
MCR - B4B- cell A25		
MCR - B4B- cell A26		
MCR - B4B- cell A27		
MCR - B4B- cell A28		
MCR - B4B- cell A29		
MCR - B4B- cell A30		
MCR - B4B- cell A31		
MCR - B4B- cell B32		
MCR - B4B- cell C32		
MCR - B4B- cell B33		
MCR - B4B- cell C33		
MCR - B4B- cell B34		
MCR - B4B- cell C34		
MCR - B4B- cell B35		
MCR - B4B- cell C35		
MCR - B4B- cell B36		
MCR - B4B- cell C36		
MCR - B4B- cell B37		

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MCR - B4B- cell C37		
MCR - B4B- cell B38		
MCR - B4B- cell C38		
MCR - B4B- cell B39		
MCR - B4B- cell C39		
Assets - D1- General	<p>The high level of detail required on investments may be burdensome and costly to medium sized and small undertakings. Regarding proportionality, we note that this is only envisaged to apply for the frequency with which the detailed asset templates are prepared. Decisions with regard to additional proportionality in terms of content is left to local supervisors via the proposed application of the exemption. This may lead to an unlevel playing field. EIOPA should issue guidelines on proportionality or exempt small and medium sized undertakings from reporting the detailed list altogether. We would suggest considering additional proportionality measures aimed at the content of the reporting requirements such as a materiality thresholds and further use of simplified templates.</p> <p>Additionally, there are many cells which will not be applicable depending on the type of investment. Will these be automatically shown as not applicable when a certain CIC category is selected? We consider this straightforward step would greatly aid the clarity of the templates.</p>	
Assets - D1- Purpose	<p>The justification for the high level of detail of the information required by undertakings seems to be based particularly on financial stability purposes. We would expect that information from large undertakings in particular would be useful to collect in the context of financial stability. Information from small undertakings on the other hand seems less useful.</p>	
Assets - D1- Benefits	<p>From the perspective of smaller firms the benefit of acquiring information on investments on this detailed level does not meet the proportionality principle for policyholder protection, in our view. A lower less burdensome level of detail would in our view be sufficient to properly asses the financial risks.</p>	

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Assets - D1- Costs	<p>Initial costs to develop and implement the systems to acquire and report the required information may be quite substantial for smaller firms and may not be proportional to their risk profile and size.</p> <p>The detailed list of investments requires extraction of data from several different source systems and will also require continuous maintenance and reconciliation of these data streams. Therefore cost may be significant and recurrent. Furthermore in case investment data has to be provided by third party investment managers these additional services will likely lead to a higher fees.</p>	
Assets - D1- Groups	Reporting at group level includes non-supervised entities within the group. It would be helpful if EIOPA could specify what is exactly meant by non-supervised entities. Does this for instance include Asian subsidiary entities of a European insurance group supervised by an Asian supervisor?	
Assets - D1- Materiality	We would propose a materiality threshold and/or a simplified reporting template to minimize disproportionate burden and costs for small and medium sized undertakings or immaterial non EEA entities within a group.	
Assets - D1- Disclosure		
Assets - D1- Frequency		
Assets - D1 - Quarterly Exemption	As far as we understand there is no quarterly reporting requirement (and therefore no exemption) for template AS-D1. This is however the case for AS-D1Q. We will comment on the issue of quarterly exemption at Assets - D1Q- Frequency.	
Assets - D1- cell A1		
Assets - D1- cell A2		
Assets - D1- cell A3		
Assets - D1- cell A4	We would be in favour of more guidance with regard to investments for which no standardized code is available.	
Assets - D1- cell A5		

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Assets - D1- cell A6		
Assets - D1- cell A7		
Assets - D1- cell A8		
Assets - D1- cell A9		
Assets - D1- cell A10	Groups tend to evolve, merge or become separated over time. For proportionality reasons we suggest that no historical correction is required and that the group is the one existing at the reporting date.	
Assets - D1- cell A11	We suggest that the country of the issuer will apply at the reporting date and that no historical correction will be required. See also our comment on Asset D1 – A10.	
Assets - D1- cell A12		
Assets - D1- cell A13		
Assets - D1- cell A15		
Assets - D1- cell A16		
Assets - D1- cell A17		
Assets - D1- cell A18		
Assets - D1- cell A19		
Assets - D1- cell A20		
Assets - D1- cell A22		
Assets - D1- cell A23		
Assets - D1- cell A24		
Assets - D1- cell A25		
Assets - D1- cell A26		
Assets - D1- cell A28		
Assets - D1- cell A30		
Assets - D1Q- General	According to the proposal national supervisors will have complete discretion to reduce the number of exemptions, with indicative criteria set out in Level 3. Since the Level 3 criteria are not clear yet uncertainty remains around exemptions. We therefore suggest allowing undertakings sufficient time to prepare themselves for the quarterly	

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	<p>reportings. This could be particularly challenging where the group has acquired new undertakings, and there should be a reasonable period of grace to adjust their systems. : We propose that this reasonable period of time will be determined between the undertaking and the supervisor at the time of the acquisition.</p> <p>This refers to Level 3 guidelines which have only been shared with a limited number of insurance industry participants and stakeholders and not publicly. Those stakeholders which have not have access are therefore at a disadvantage in not being in a position to respond effectively to this consultation. We suggest that once these guidelines are made public, these templates should be consulted on again.</p>	
Assets - D1Q- Purpose		
Assets - D1Q- Benefits		
Assets - D1Q- Costs	<p>This depends on whether organizations need to execute additional manual adjustments to their portfolio lists this will result in higher costs. It is likely that the balance sheet will be completed based on the same portfolio list to ensure one version of the truth.</p>	
Assets - D1Q- Groups		
Assets - D1Q- Materiality		
Assets - D1Q- Disclosure		
Assets - D1Q- Frequency	<p>The group of larger undertakings that fall into the eligibility criteria may differ from year to year. This would mean that these undertakings will have to make initial costs to develop and implement reporting systems enabling them to report on a quarterly basis while in the next and following years they may not fulfill the eligible criteria any more and are allowed to report just a summary.</p> <p>Furthermore it is not clear how the proposed methodology for exemption of reporting the detailed list on a quarterly basis will work for small and mediumsized insurers.</p> <p>With regard to the policy options which are proposed in the Consultation Paper Impact Assessment on the reporting package of Solvency II, we do not agree with the</p>	

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	proposed option C3 but would be in favor option C1. This would reduce the volatility and reduce unnecessary costs.	
Assets - D1Q- cell A1 (list)	For all comments regarding (list) see Assets - D1	
Assets - D1Q- cell A2 (list)		
Assets - D1Q- cell A3 (list)		
Assets - D1Q- cell A4 (list)		
Assets - D1Q- cell A5 (list)		
Assets - D1Q- cell A6 (list)		
Assets - D1Q- cell A7 (list)		
Assets - D1Q- cell A8 (list)		
Assets - D1Q- cell A9 (list)		
Assets - D1Q- cell A10 (list)		
Assets - D1Q- cell A12 (list)		
Assets - D1Q- cell A13 (list)		
Assets - D1Q- cell A14 (list)		
Assets - D1Q- cell A15 (list)		
Assets - D1Q- cell A16 (list)		
Assets - D1Q- cell A17 (list)		
Assets - D1Q- cell A18 (list)		
Assets - D1Q- cell A20 (list)		
Assets - D1Q- cell A22 (list)		
Assets - D1Q- cell A24 (list)		
Assets - D1Q- cell A25 (list)		
Assets - D1Q- cell A28 (list)		
Assets - D1Q- cell A30 (list)		
Assets - D1Q- cell A3		

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Assets - D1Q- cell A5		
Assets - D1Q- cell A6		
Assets - D1Q- cell A7		
Assets - D1Q- cell A7A		
Assets - D1Q- cell A8		
Assets - D1Q- cell A8A		
Assets - D1Q- cell A8C		
Assets - D1Q- cell A8D		
Assets - D1Q- cell A9A	Based on clients' feedback the activity foreseen within D1Q with regard to investment funds seems to be really challenging for insurers due to the workload to be provided quarterly (activity that has been done for the QIS 5 exercise). Thus, a proportionality principle would be welcome.	
Assets - D1Q- cell A9B	See comment on Cell A9A.	
Assets - D1Q- cell A9C	See comment on Cell A9A.	
Assets - D1Q- cell A9D	See comment on Cell A9A.	
Assets - D1Q- cell A9E	See comment on Cell A9A.	
Assets - D1Q- cell A9F	See comment on Cell A9A.	
Assets - D1Q- cell A10A		
Assets - D1Q- cell A10B		
Assets - D1Q- cell A14		
Assets - D1Q- cell A11		
Assets - D1Q- cell A12		
Assets - D1Q- cell A13		
Assets - D1Q- cell A27		
Assets - D1Q- cell L16		
Assets - D1S- General	Field Assets D1S – Cell A16 is missing. Please also confirm that cell A11 is not included in the template.	

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Assets - D1S- Purpose		
Assets - D1S- Benefits		
Assets - D1S- Costs		
Assets - D1S- Groups		
Assets - D1S- Materiality		
Assets - D1S- Disclosure		
Assets - D1S- Frequency		
Assets - D1S- cell A1		
Assets - D1S- cell A2		
Assets - D1S- cell A3	Partial without further clarification can be widely interpreted.	
Assets - D1S- cell A4		
Assets - D1S- cell A5		
Assets - D1S- cell A6		
Assets - D1S- cell A7		
Assets - D1S- cell A8		
Assets - D1S- cell A9		
Assets - D1S- cell A10		
Assets - D1S- cell A12		
Assets - D1S- cell A13		
Assets - D1S- cell A14		
Assets - D1S- cell A15		
Assets - D20- General		
Assets - D20- Purpose		
Assets - D20- Benefits		

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Assets – D20- Costs		
Assets – D20- Groups		
Assets – D20- Materiality		
Assets – D20- Disclosure		
Assets – D20- Frequency		
Assets – D20 – Quarterly Exemption	See comments made at Assets - D1Q- Frequency.	
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		

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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		
Assets - D20- cell A29		
Assets - D20- cell A31		
Assets - D20- cell A32		
Assets - D20- cell A33		
Assets - D20- cell A34		
Assets - D20- cell A35		
Assets - D2T- General	Where a contract that was open but has been reduced in size, it would be helpful to have clarification on how to report. Does EIOPA expects that only the closed portion will be disclosed in this template or does EIOPA expect undertakings to make the assumption that the original contract is deemed to be closed and a new one opened in its place?	
Assets - D2T- Purpose		
Assets - D2T- Benefits	It is not made clear what the specific benefits are of collecting detailed information on derivatives contracts that have been closed prior to the reporting date. The Benefits section merely repeats the text used in the same section in the D20 summary document.	
Assets - D2T- Costs		
Assets - D2T- Groups		
Assets - D2T- Materiality		

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Assets - D2T- Disclosure		
Assets - D2T- Frequency		
Assets - D2T- Quarterly Exemption	See comments made at Assets - D1Q- Frequency	
Assets - D2T- cell A1		
Assets - D2T- cell A2		
Assets - D2T- cell A3		
Assets - D2T- cell A4		
Assets - D2T- cell A5		
Assets - D2T- cell A6		
Assets - D2T- cell A7		
Assets - D2T- cell A8		
Assets - D2T- cell A9		
Assets - D2T- cell A10		
Assets - D2T- cell A11		
Assets - D2T- cell A13		
Assets - D2T- cell A14	We understand that this would be the Delta as at the date that the contract was closed given that we would expect that undertakings will not be able to source the Delta on a closed contract as at the reporting date.	
Assets - D2T- cell A15		
Assets - D2T- cell A16		
Assets - D2T- cell A17		
Assets - D2T- cell A18		
Assets - D2T- cell A19		
Assets - D2T- cell A20		
Assets - D2T- cell A21		

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Assets - D2T- cell A22		
Assets - D2T- cell A23		
Assets - D2T- cell A24		
Assets - D2T- cell A25		
Assets - D2T- cell A26		
Assets - D2T- cell A27		
Assets - D2T- cell A28		
Assets - D2T- cell A30		
Assets - D2T- cell A31		
Assets - D2T- cell A32		
Assets - D2T- cell A34	The guidance is unclear as to what rating is required. Is it the one as at the date the contract was closed (which is our current working assumption) or as at the reporting date (in which case we would question the need for ratings as there is no exposure once the contract is closed).	
Assets - D2T- cell A35		
Assets – D3- General		
Assets – D3- Purpose		
Assets – D3- Benefits		
Assets – D3- Costs		
Assets – D3- Groups		
Assets – D3- Materiality		
Assets – D3- Disclosure		
Assets – D3- Frequency		
Assets - D3- cell A1		
Assets - D3- cell A3		

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Assets - D3- cell A4		
Assets - D3- cell A6	We assume that the currency to be used to report the dividends received will be the currency of the country of the reporting undertaking and not (necessarily) the currency in which the dividends have been paid. If so please include this in the LOG document. This would also apply to D3-A7, D3-A8 and D3- A15.	
Assets - D3- cell A7		
Assets - D3- cell A8		
Assets - D3- cell A15		
Assets – D4- General	This is a particularly challenging requirement for insurers to meet since this level of detail may not be required for modelling purposes (where more prudent assumptions have been made about the underlying assets than would actually be the case) and a methodology for deriving the required data is yet to emerge in the industry. We propose further guidance and materiality thresholds are provided for the look through requirements to limit the potentially considerable cost and effort required to populate this template.	
Assets – D4- Purpose		
Assets – D4- Benefits		
Assets – D4- Costs		
Assets – D4- Groups		
Assets – D4- Materiality		
Assets – D4- Disclosure		
Assets – D4- Frequency		
Assets – D4 – Quarterly Exemption		
Assets - D4- cell A1		
Assets - D4- cell A2		
Assets - D4- cell A3		

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Assets - D4- cell A4		
Assets - D4- cell A5		
Assets - D4- cell A6		
Assets - D4- cell A7		
Assets - D4- cell A8	A better and deeper explanation of cell A8 (level of look through used) in D4 should be provided to undertakings considering the information requested in D1Q which, as previously mentioned, foresees the application of a certain grade of "look through approach" since it is requested to provide the total amount invested for each category (equities, corp bonds, gov bonds, etc.). Clearly, in order to be able to sum up all the numbers for each macro-category, insurers need to apply a look through approach for each investment, leading to a considerable effort.	
Assets – D5- General	This template requires all activity during the reporting period which would mean very large volumes of data where there is an active securities lending portfolio. We should propose that this is made a point in time requirement.	
Assets – D5- Purpose		
Assets – D5- Benefits		
Assets – D5- Costs		
Assets – D5- Groups		
Assets – D5- Materiality		
Assets – D5- Disclosure		
Assets – D5- Frequency		
Assets - D5- cell A1		
Assets - D5- cell A2		
Assets - D5- cell A3		
Assets - D5- cell A4		
Assets - D5- cell A5		

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Assets - D5- cell A6		
Assets - D5- cell A7		
Assets - D5- cell A8		
Assets - D5- cell A9		
Assets - D5- cell A10		
Assets - D5- cell A11		
Assets - D5- cell A12		
Assets - D5- cell A13		
Assets - D5- cell A14	The guidance in the LOG is not clear since revenues are dependent on duration. As this may not be fixed, this makes calculating revenues not possible. Perhaps an agreed fee for each loan should be reported as the SII value.	
Assets – D6- General	This template requires data on an asset by asset basis which is much more detailed than is currently available to most insurers. This will be particularly challenging for groups with non-EU based fund managers since they may not be in a position to report this detail. Therefore this could prove to be a costly and difficult task and consequently we would seek to obtain some sort of simplification for them in the form of more summarised data required to be reported.	
Assets – D6- Purpose		
Assets – D6- Benefits		
Assets – D6- Costs		
Assets – D6- Groups		
Assets – D6- Materiality		
Assets – D6- Disclosure		
Assets – D6- Frequency		
Assets - D6- cell A2		
Assets - D6- cell A3		

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Assets - D6- cell A4		
Assets - D6- cell A5		
Assets - D6- cell A6		
Assets - D6- cell A7		
Assets - D6- cell A8		
Assets - D6- cell A9		
Assets - D6- cell A10		
Assets - D6- cell A12		
Assets - D6- cell A19		
Assets - D6- cell A20		
Assets - D6- cell A21		
Assets - D6- cell A22		
Assets - D6- cell A24		
Assets - D6- cell A25		
Assets - D6- cell A26		
Assets - D6- cell A27		
Assets - D6- cell A28		
TP - F1 & F1Q- General	<p>In order to reflect the specific characteristics of the private health insurance contracts in some jurisdictions we suggest the development of individual QRTs for the health insurance.</p> <p>LoB Definition :</p> <ul style="list-style-type: none"> <li>• In some jurisdictions further clarification with regard to the definition of the contracts with options and guarantees specific for SLT Health Insurance contracts would be helpful.</li> <li>• Further guidance required with regard to the definition of Lines of Business (LoBs) for Health Insurance products in some jurisdictions: clarification is</li> </ul>	

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	<p>required with regard to the explicit (mutual exclusiv) allocation of the Health products between SLT and Non-SLT Health Insurance Lines of Business (LoBs).</p> <ul style="list-style-type: none"> <li>In some jurisdictions more guidance is necessary with regard to allocation of life insurance products to corresponding Solvency II LoBs in case the allocation is not clear without ambiguity, for example, for products that contain both features - unit-linked and profit participation (e.g. are policies with profit participation for which profits are invested into funds to be reported as unit-linked policies or as participation policies?)</li> </ul>	
TP - F1 & F1Q - Purpose		
TP - F1 & F1Q - Benefits		
TP - F1 & F1Q - Costs		
TP - F1 & F1Q - Groups		
TP - F1 & F1Q - Materiality	<p>It should be possible to apply the materiality principle with regard to allocation of life insurance products to the SII LoBs in case the allocation is not clear without ambiguity and the product is not material in context of the whole portfolio.</p> <p>Materiality principle should be applicable with regard to reporting on SII reinsurance recoverables in case the reinsurance represents an insignificant risk transfer with regard to the whole gross portfolio (in this case, reinsurance is often not modelled explicitly or approximations are used). Definition of individual materiality thresholds by insurance companies resp. reporting of local GAAP figures should be possible. This also applies for reinsurance receivables.</p>	
TP - F1 & F1Q - Disclosure		
TP - F1 & F1Q - Frequency		
TP - F1- cells A1 - A14		
TP - F1- cell A7A		

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TP - F1- cell A7B		
TP - F1- cell A7C		
TP - F1- cells B1 – B14		
TP - F1- cells B2 – C2		
TP - F1- cells B4-C1		
TP - F1- cells BA1 – BA13		
TP - F1- cell BB1		
TP - F1- cell BB10		
TP - F1- cell BB13		
TP - F1- cells BC1 – BC13		
TP - F1- cells BD1 – BD13		
TP - F1- cells BF1 – BF13		
TP - F1- cells CB1 – CB14A		
TP - F1- cells CC1 – CC14		
TP - F1- cells CD1 – CD14A		
TP - F1- cells C1 – C14A		
TP - F1- cells CB9A – C9A		
TP - F1- cells E1 – E13		
TP - F1- cells FB7A		
TP - F1- cells FB7B		
TP - F1- cells FB7C		
TP - F1- cells IA1 – IA 13	In some jurisdictions further clarification with regard to the definition of the surrender value specific for SLT Health Insurance contracts would be helpful. For example, more guidance is required whether the transferrable – to another health insurance company / product in case of surrender - technical provision (in German: "mitgabefähige Alterungsrückstellung") represents the surrender value or can be used as the approximation.	

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TP - F1- cells J1 - JL13		
TP - F1- cells M1-M13		
TP - F1- cells N1-N13		
TP - F1- cells O1-O13		
TP - F1- cells P1-P13		
TP - F1- cells Q1-Q13		
TP - F1Q- cells A1-A13		
TP - F1Q- cell A7A		
TP - F1Q- cell A7B		
TP - F1Q- cell A7C		
TP - F1Q- cells B1-B13		
TP - F1Q- cells C1-C14A		
TP - F1Q- cell C11		
TP - F1Q- cell C12		
TP - F1Q- cell C13		
TP - F1Q- cell C14A		
TP - F1Q- cell E1-E13		
TP - F2- General	<p>In order to reflect the specific characteristics of the private health insurance contracts in some jurisdictions we suggest the development of individual QRTs for the health insurance .</p> <p>Further guidance required with regard to the definition of Lines of Business (LoBs) for Health Insurance products in some jurisdictions: clarification is required with regard to the explicit (mutual exclusiv) allocation of the Heath products between SLT and Non-SLT Health Insurance Lines of Business (LoBs).</p>	
TP - F2- Purpose		
TP - F2- Benefits		

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TP – F2- Costs		
TP – F2- Groups		
TP – F2- Materiality		
TP – F2- Disclosure		
TP – F2- Frequency		
TP – F2- cells A1-A34		
TP – F2- cells C1 – C35		
TP -F2- cells D1-D35		
TP -F2- cells F1-F35		
TP -F2- cells AU1 –AU35		
TP -F2- cells CU1 – CU35		
TP -F2- cells DU1 – DU35		
TP -F2- cells FU1 – FU35		
TP -F2- cells I1 –I35		
TP -F2- cells J1 –J35		
TP -F2- cells K1 –K35		
TP -F2- cells L1 –L35		
TP -F2- cells M1 –M35		
TP -F2- cells N1 –N35		
TP -F2- cells O1 –O35		
TP -F2- cells P1-P35		
TP -F2- cells Q1 –Q35		
TP -F2- cells R1 –R35		
TP -F2- cells S1 –S35		
TP -F2- cells T1 –T35		

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TP -F2- cells U1 – U35	Further clarification with regard to the scope and definition of undiscounted projected cash flows specific for SLT and Non-SLT Health Insurance in some jurisdictions would be helpful.	
TP -F2- cells CH1 –CH35	Further clarification with regard to the scope and definition of undiscounted projected cash flows specific for SLT and Non-SLT Health Insurance in some jurisdictions would be helpful.	
TP -F2- cells DH1 –DH35	Further clarification with regard to the scope and definition of undiscounted projected cash flows specific for SLT and Non-SLT Health Insurance in some jurisdictions would be helpful.	
TP -F2- cells FH1 –FH35	Further clarification with regard to the scope and definition of undiscounted projected cash flows specific for SLT and Non-SLT Health Insurance in some jurisdictions would be helpful.	
TP -F2- cells V1 –V35		
TP -F2- cells X1 – X35		
TP -F2- cells Y1-Y35		
TP -F2- cells Z1- Z35		
TP -F2- cells GH1 –GH35		
TP – F3- General	<p>In order to reflect the specific characteristics of the private health insurance contracts in some jurisdictions we suggest the development of individual QRTs for the health insurance.</p> <p>Explicit guidance from EIOPA - included in the LOG document - is required with regard to the relevance of F3 template for the Health Insurance (see LOG-file, cell A6: "health insurance" was not explicitly mentioned in the context of "major LoB"). If the template is not relevant for the Health Insurance, the LOG-file should explicitly except it.</p> <p>Further guidance required with regard to the definition of Lines of Business (LoBs) for Health Insurance products in some jurisdictions: clarification is required with regard to the explicit (mutual exclusiv) allocation of the Heath products between SLT and Non-SLT Health Insurance Lines of Business (LoBs).</p>	

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	There should be some organization - EIOPA, associations, local supervisor - that is responsible for local interpretation and giving explicit guidance of Pillar 3 reporting requirements considering specifics of local markets.	
TP - F3- Purpose		
TP - F3- Benefits		
TP - F3- Costs	Clarification regarding the minimum level of granularity required in this template would be helpful, also taking into consideration materiality considerations. For some jurisdictions there are concerns that the level of granularity required in this template might cause companies to incur significant costs for implementing these changes.	
TP - F3- Groups		
TP - F3- Materiality	In view of the concerns with respect to the costs (see comment on F3 - Costs, F3 - A7 and F3 - A15) a materiality threshold with respect to the level of granularity should be defined.	
TP - F3- Disclosure		
TP - F3- Frequency		
TP - F3- cell A1		
TP - F3- cell A2A		
TP - F3- cell A2B		
TP - F3- cell A2C		
TP - F3- cell A3		
TP - F3- cell A4		
TP - F3- cell A5		
TP - F3- cell A6		
TP - F3- cell A7	Depending on the level of granularity required in this template and the current statutory requirements for each jurisdiction it might not be straightforward to supply the required premium information, resulting in additional, possibly significant, costs for implementing these changes.	

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TP - F3- cell A8		
TP - F3- cell A9		
TP - F3- cell A10		
TP - F3- cell A15	Depending on the level of granularity required in this template and the current statutory requirements for each jurisdiction it might not be straightforward to supply the required premium information, resulting in additional, possibly significant, costs for implementing these changes. In how far is it possible to use the amount under local GAAP resp. IFRS as an approximation for "written premiums"? -> Explicit guidance resp. reference to relevant definiton in the Directive, QIS, L2 is necessary.	
TP - F3- cell A21		
TP - F3- cell A24	In how far is this amount to be consistent with the figure of the RE-Template (J1, Cell M11 Risk capital)? Is this amount to be reported under local GAAP (HGB in Germany) resp. Solvency II balance sheet/ IFRS? -> Explicit guidance resp. reference to relevant definiton in the Directive, QIS, L2 is necessary.	
TP - F3- cell A26	Suggestion: Surrender value should be reported on HRG-basis in order to be consistent with the reporting on best estimate of technical provisions in the template.	
TP - F3- cell A30	Is there only one rate (an average) to be provided by HRG – or does a different guarantee imply a new product denomination?	
TP - F3- cell A34A	A clearer definition as to what is required is necessary. For example, more guidance would be helpful I whether the sum of theoretical claims used as an assumption within the pricing of a particular product is to be disclosed.	
TP - F3- cell A41		
TP – F3A- General		
TP – F3A- Purpose		
TP – F3A- Benefits		
TP – F3A- Costs		
TP – F3A- Groups		
TP – F3A- Materiality		

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TP - F3A- Disclosure		
TP - F3A- Frequency		
TP - F3A- cell A1		
TP - F3A- cell A2		
TP - F3A- cell A3		
TP - F3A- cell A4		
TP - F3A- cell A5		
TP - F3A- cell A6	A further example on cases when the type of guarantee is not associated to an interest rate guarantee (e.g. ratchet on fund value) might be helpful.	
TP - F3A- cell A7		
TP - F3A- cell A8		
TP - F3A- cell A9		
TP - F3A- cell A10		
TP - F3A- cell A11		
TP - F3A- cell A12		
TP - F3A- cell A13		
TP - F3A- cell A14		
TP - F3A- cell A15		
TP - F3A- cell A16		
TP - F3B- cell A1		
TP - F3B- cell A2		
TP - F3B- cell A3		
TP - F3B- cell A4		
TP - F3B- cell A5		
TP - F3B- cell A6		
TP - F3B- cell A7		

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TP - F3B- cell A8		
TP - F3B- cell A9		
TP - F3B- cell A10	Hedging might be done for a portfolio of products without allocating hedge instruments to a specific product. Some guidance on possible ways to split up the result of the hedge by product may be required.	
TP – F4- General	If the criteria set out in document „TP (L) - F4 LOG.doc“ (see item “Currency”) are met, sheet F4 needs to be filled for each LoB and each currency as well as for the total per LoB. For a company operating with several „settlement currencies“, e.g. reinsurance companies, this would mean substantial effort. (This comment assumes that the template relates to both insurers and reinsurers, since no specific templates for reinsurers exist. Clarification on this point would also be helpful, since the first cell of the Definition of the “TP (L) – F4 LOG.doc” says that “Template should be filled for direct business only.” which may lead to confusion in the context of reinsurance companies.)	
TP – F4- Purpose		
TP – F4- Benefits		
TP – F4- Costs		
TP – F4- Groups		
TP – F4- Materiality		
TP – F4- Disclosure		
TP – F4- Frequency		
TP - F4- cell A0	<ul style="list-style-type: none"> <li>• More Guidance is required in order to clarify which numbers should be entered into A0, A1 and A3, in particular in comparison to A5. E.g. which assumptions should be made in order to calculate the « undiscounted annuity claims provisions » and how they differ from the Best Estimate assumptions to be made for the calculation of A5. In addition, some local guidance, relating the entries required to the statutory annuity claims provisions potentially differing by jurisdiction would be helpful.</li> </ul>	

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	<ul style="list-style-type: none"> <li>Depending on the clarification for the calculation of the undiscounted annuity claims provisions and on how the annuity calculations on a statutory basis are performed it may not be straightforward to calculate the undiscounted annuity claims provisions (i.e. to « switch off discounting »).</li> <li>We suggest reconsidering the number of accident years included in the template and the subtotals in order to align it as far as possible with other templates that are related, e.g. F2. Moreover, for annuities a lot of the development will be after year 10.</li> </ul> <p>Furthermore, the link to template F2, cells M1 to P35 should be explained in more detail and guidance given regarding the connection between these templates.</p>	
TP - F4- cell A1	<ul style="list-style-type: none"> <li>More Guidance is required in order to clarify which numbers should be entered into A0, A1 and A3, in particular in comparison to A5. E.g. which assumptions should be made in order to calculate the « undiscounted annuity claims provisions » and how they differ from the Best Estimate assumptions to be made for the calculation of A5. In addition, some local guidance, relating the entries required to the statutory annuity claims provisions potentially differing by jurisdiction would be helpful.</li> <li>Depending on the clarification for the calculation of the undiscounted annuity claims provisions and on how the annuity calculations on a statutory basis are performed it may not be straightforward to calculate the undiscounted annuity claims provisions (i.e. to « switch off discounting »).</li> <li>We suggest reconsidering the number of accident years included in the template and the subtotals in order to align it as far as possible with other templates that are related, e.g. F2. Moreover, for annuities a lot of the development will be after year 10.</li> </ul> <p>Furthermore, the link to template F2, cells M1 to P35 should be explained in more detail and guidance given regarding the connection between these templates.</p>	
TP - F4- cell A2		
TP - F4- cell A3	<ul style="list-style-type: none"> <li>More Guidance is required in order to clarify which numbers should be entered into A0, A1 and A3, in particular in comparison to A5. E.g. which assumptions should be made in order to calculate the « undiscounted annuity claims provisions » and how they differ from the Best Estimate assumptions to be made for the calculation of A5. In addition, some local guidance, relating the</li> </ul>	

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	<p>entries required to the statutory annuity claims provisions potentially differing by jurisdiction would be helpful.</p> <ul style="list-style-type: none"> <li>• Depending on the clarification for the calculation of the undiscounted annuity claims provisions and on how the annuity calculations on a statutory basis are performed it may not be straightforward to calculate the undiscounted annuity claims provisions (i.e. to « switch off discounting »).</li> <li>• We suggest reconsidering the number of accident years included in the template and the subtotals in order to align it as far as possible with other templates that are related, e.g. F2. Moreover, for annuities a lot of the development will be after year 10.</li> </ul> <p>Furthermore, the link to template F2, cells M1 to P35 should be explained in more detail and guidance given regarding the connection between these templates.</p>	
TP - F4- cell A4		
TP - F4- cell A5		
TP - F4- cell B1	More Guidance required, e.g. define what is meant exactly by the technical rate and what kind of average should be taken.	
TP - F4- cell C1	More Guidance required. On what basis and with which assumptions should the duration be calculated, e.g. considering all closed claims from prior years or expected duration also of annuities still running ?	
TP - F4- cell D1	Similar to B1 and C1. More Guidance required regarding choice of weighting and basis to use for average.	
TP - F4- cell A6	Corresponds to run-off result for annuities on undiscounted basis. Discounting and the Best Estimate claim provision is not taken into account for the Test (in particular, if provisions were calculated with a discount rate then unwinding of the discount rate in provision during the year N is not considered.) Given the potentially long time-frames for annuities the outcome of the test (labelled as « Test for over-/underreserving ») needs to be interpreted with care, since not discounted. Moreover, outcome might be volatile for accident years with small number of annuity claims. A more intuitive test may be the comparison of the booked annuity claims provision with the best estimate annuity claims provision.	
TP – E1 & E1Q- General	More guidance required. It should be specified whether all amounts are to be converted to reporting currency at the evaluation date.	

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

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TP -E1- cells A21-P21		
TP -E1- cells A25-P25		
TP -E1- cells A29-P29		
TP -E1- cells A30-P30		
TP -E1- cells A31-P31		
TP -E1- cells A32-P32		
TP -E1- cells A33-P33		
TP -E1- cells A34-P34		
TP -E1- cells A35-P35		
TP -E1- cells A36-P36		
TP -E1- cellss A37-P37		
TP -E1- cellss A38-P38		
TP -E1- cellss A39-P39		
TP -E1- cellss A40-P40		
TP -E1- cellss A41-L53		
TP - E1 Q- cells A1-R1		
TP - E1 Q- cells A2-R2		
TP - E1 Q- cells A3-R3		
TP - E1 Q- cells A5-R5		
TP - E1 Q- cells A6-R6		
TP - E1 Q- cells A10-R10		
TP - E2- General	It should be clarified whether all amounts are to be converted to reporting currency at the evaluation date.	
TP - E2- Purpose		
TP - E2- Benefits		

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TP - E2- Costs		
TP - E2- Groups		
TP - E2- Materiality		
TP - E2- Disclosure		
TP - E2- Frequency		
TP - E2- cells A1-A31		
TP - E2- cells B1-B31		
TP - E2- cells C1-C31		
TP - E2- cells D1-D31		
TP - E2- cells E1-E31		
TP - E2- cells F1-F31		
TP - E3- General		
TP - E3- Purpose		
TP - E3- Benefits		
TP - E3- Costs		
TP - E3- Groups		
TP - E3- Materiality		
TP - E3- Disclosure		
TP - E3- Frequency		
TP - E3- cells A00	Does it assume that the undertaking should sum up all Homogeneous Risk Groups within a particular LoB?	
TP - E3- cells A01	One may use a combination of different methodologies in order to estimate the provisions. Should they all be specified?	
TP - E3- cells A02	One may use a combination of different methodologies in order to estimate the tail	

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	factor. Should they all be specified?	
TP - E3- cells A03: N		
TP - E3- cells A04	Is this the reporting currency - should all other currencies be converted to the reporting currency at the evaluation date?	
TP - E3- cells A1-A15-J0		
TP - E3- cells A17-A31-J16		
TP - E3- cells A33-A47-J32		
TP - E3- cells P1-P15-J0	Providing best estimate for case reserves can be impractical. Is it acceptable to provide instead case reserves for claim already reported?	
TP - E3- cells P33-P47-J32		
TP - E3- cells AE1-AE15-J0		
TP - E3- cells AE17-AE31-J0		
TP - E3- cells AE33-AE47-J0		
TP - E3- cells IH1-IE15B		
TP - E4- General		
TP - E4- Purpose		
TP - E4- Benefits		
TP - E4- Costs		
TP - E4- Groups		
TP - E4- Materiality		
TP - E4- Disclosure		
TP - E4- Frequency		
TP - E4- cells A1-A10		
TP - E4- cells B1-B10		
TP - E4- cells C1-C10		

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TP - E4- cells D1-D10		
TP - E4- cells E1-E10		
TP - E4- cells F1-F10		
TP - E4- cells G1-G10		
TP - E4- cells H1-H10		
TP - E4- cells I1-I10		
TP - E4- cells J1-J10		
TP - E4- cells K1-K10		
TP - E4- cells L1-L10		
TP - E4- cells M1-M11		
TP - E4- cells N1-N11		
TP - E4- cells O1-O11		
TP - E4- cells P1-P10		
TP - E4- cells Q1-Q10		
TP - E4- cells R1-R10		
TP - E4- cells S1-S10		
TP - E4- cells T1-T10		
TP - E6- General		
TP - E6- Purpose		
TP - E6- Benefits		
TP - E6- Costs		
TP - E6- Groups		
TP - E6- Materiality		
TP - E6- Disclosure		

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TP – E6- Frequency		
TP – E6- cells A1-A20		
TP – E6- cells B1-B20		
TP – E6- cells C1-C20		
TP – E6- cells D1-D20		
TP – E6- cells E1-E20		
TP – E6- cells F1-F20		
TP – E6- cells G1-G20		
TP – E6- cells H1-H20		
TP – E6- cells I1-I20		
TP – E6- cells J1-J20		
TP – E6- cells K1-K20		
TP – E6- cells L1-L20		
TP – E6- cells AE1-AE20		
TP – E6- cells AF1-AF20		
TP – E7A- General		
TP – E7A- Purpose		
TP – E7A- Benefits		
TP – E7A- Costs		
TP – E7A- Groups		
TP – E7A- Materiality		
TP – E7A- Disclosure		
TP – E7A- Frequency		
TP – E7A- cell A1		

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TP – E7A- cell B1		
TP – E7A- cell C1		
TP – E7A- cell D1		
TP – E7A- cell E1		
TP – E7A- cell F1		
TP – E7A- cell G1		
TP – E7A- cell H1		
TP – E7A- cell I1		
TP – E7A- cell J1		
TP – E7A- cell K1		
TP – E7A- cell L1		
TP – E7A- cell M1		
TP – E7B- General		
TP – E7B- Purpose		
TP – E7B- Benefits		
TP – E7B- Costs		
TP – E7B- Groups		
TP – E7B- Materiality		
TP – E7B- Disclosure		
TP – E7B- Frequency		
TP – E7B- cell A01		
TP – E7B- cell A1		
TP – E7B- cell B1		

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TP - E7B- cell C1		
TP - E7B- cell D1		
TP - E7B- cell E1		
Re - J1- General	High level of detail required will be burdensome to smaller entities and those that may have a small number of facultative agreements in place as part of their overall reinsurance.	
Re - J1- Purpose		
Re - J1- Benefits		
Re - J1- Costs	Initial costs to develop the systems to report the information may be burdensome on smaller entities due amount of data required which may not be proportionate to the size of the entity and the size of the facultative reinsurance in place in relation to the overall reinsurance program,	
Re - J1- Groups		
Re - J1- Materiality	<p>Wording per the LOG is not very clear, is it saying that only the top 10 FAC treaties (based on risk/exposure) should be disclosed? Or in terms of the overall top 10 reinsurance risks, disclose the FAC treaties if they fall within this category. For life business is it the 10 most significant lives that are reinsured?</p> <p>Consider wording to read "By selecting the 10 most significant facultative agreements in terms of reinsured exposure..... in case of a single risk event"</p> <p>Consider introducing proportionality, a company may only have a small number of contracts in relation to their overall book. Significnat amount of data required if this is an insignificant portion of the overall reinsurance program.</p>	
Re - J1- Disclosure		
Re - J1- Frequency		
Re - J1- cell A00		
Re - J1- cell A1	If codes are to be provided by EIOPA, it will need to be clarified how EIOPA will	

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	develop this database, one option is to request companies to send in details of the counterparty in advance for EIOPA to develop the codes. If this is the option chosen then a timeline will need to be put in place to allow companies gather the relevant data and an indication of when the codes will be made available from EIOPA.	
Re - J1- cell B1		
Re - J1- cell C1	<p>This description of the materiality threshold is not very clear – wording should to be clarified. As it reads now it is not clear if it refers to the top 10 treaties in terms of risk exposure? Or the top 10 overall reinsurance risks in which the Fac agreement may or may not fall.</p> <p>Consider wording to read “By selecting the 10 most significant facultative agreements in terms of reinsured exposure..... in case of a single risk event”</p>	
Re - J1- cell D1		
Re - J1- cell E1		
Re - J1- cell F1		
Re - J1- cell G1		
Re - J1- cell H1		
Re - J1- cell I1		
Re - J1- cell J1		
Re - J1- cell K1		
Re - J1- cell L1		
Re - J1- cell M1		
Re - J1- cell N1		
Re - J1- cell P1		
Re - J1- cell Q1	If codes are to be provided by EIOPA, it will need to be clarified how EIOPA will develop this database, one option is to request companies to send in details of the counterparty in advance for EIOPA to develop the codes. If this is the option chosen then a timeline will need to be put in place to allow companies gather the relevant	

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	data and an indication of when the codes will be made available from EIOPA.	
Re - J1- cell W1	If codes are to be provided by EIOPA, it will need to be clarified how EIOPA will develop this database, one option is to request companies to send in details of the counterparty in advance for EIOPA to develop the codes. If this is the option chosen then a timeline will need to be put in place to allow companies gather the relevant data and an indication of when the codes will be made available from EIOPA.	
Re - J1- cell Y1		
Re - J1- cell Z1		
Re - J1- cell AB1		
Re - J1- cell AC1		
Re - J1- cell A01		
Re - J1- cell A11	If codes are to be provided by EIOPA, it will need to be clarified how EIOPA will develop this database, one option is to request companies to send in details of the counterparty in advance for EIOPA to develop the codes. If this is the option chosen then a timeline will need to be put in place to allow companies gather the relevant data and an indication of when the codes will be made available from EIOPA.	
Re - J1- cell B11		
Re - J1- cell C11	The threshold is not very clear – wording to be clarified that this is the top 10 lives reinsured in terms of risk exposure?	
Re - J1- cell D11		
Re - J1- cell E11		
Re - J1- cell F11		
Re - J1- cell G11		
Re - J1- cell H11		
Re - J1- cell I11		
Re - J1- cell J11		
Re - J1- cell K11		
Re - J1- cell L11		

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Re - J1- cell M11		
Re - J1- cell O11	If codes are to be provided by EIOPA, it will need to be clarified how EIOPA will develop this database, one option is to request companies to send in details of the counterparty in advance for EIOPA to develop the codes. If this is the option chosen then a timeline will need to be put in place to allow companies gather the relevant data and an indication of when the codes will be made available from EIOPA.	
Re - J1- cell U11	If codes are to be provided by EIOPA, it will need to be clarified how EIOPA will develop this database, one option is to request companies to send in details of the counterparty in advance for EIOPA to develop the codes. If this is the option chosen then a timeline will need to be put in place to allow companies gather the relevant data and an indication of when the codes will be made available from EIOPA.	
Re - J1- cell W11		
Re - J1- cell X11		
Re - J1- cell Z11		
Re - J1- cell AA11		
Re - J2- General	Reporting will be burdensome for smaller entities, consider simplified reporting for smaller entities. The detailed of the treaties requires extraction of data from several different sources and will also require continuous maintenance and for the data streams to reconcile when a treaty is updated, cancelled etc. Even though a company may already maintain a treaty list, the cost of correlating and monitoring the data may be significant. The level of detail required will be burdensome for a small entity.	
Re - J2- Purpose		
Re - J2- Benefits		
Re - J2- Costs		
Re - J2- Groups		
Re - J2- Materiality	Thresholds should be introduced to allow for smaller entities or those with insignificant reinsurance programs report less volumes of data.	
Re - J2- Disclosure		

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Re - J2- Frequency	Will be burdensome for smaller entities to update for changes – Guidance says material changes should be submitted quarterly, how will this be measured/decided ? Thresholds should be considered.	
Re - J2- cell A1		
Re - J2- cell B1		
Re - J2- cell C1		
Re - J2- cell D1		
Re - J2- cell E1		
Re - J2- cell F1		
Re - J2- cell G1		
Re - J2- cell H1		
Re - J2- cell I1		
Re - J2- cell J1		
Re - J2- cell K1		
Re - J2- cell L1		
Re - J2- cell M1		
Re - J2- cell N1		
Re - J2- cell O1		
Re - J2- cell P1		
Re - J2- cell Q1		
Re - J2- cell R1		
Re - J2- cell S1		
Re - J2- cell T1		
Re - J2- cell U1		
Re - J2- cell V1		
Re - J2- cell W1		

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Re - J2- cell X1		
Re - J2- cell Y1		
Re - J2- cell Z1		
Re - J2- cell AA1		
Re - J2- cell AB1		
Re - J2- cell AC1		
Re - J2- cell AD1		
Re - J2- cell AE1		
Re - J2- cell AF1		
Re - J2- cell AG1	If codes are to be provided by EIOPA, it will need to be clarified how EIOPA will develop this database, one option is to request companies to send in details of the counterparty in advance for EIOPA to develop the codes. If this is the option chosen then a timeline will need to be put in place to allow companies gather the relevant data and an indication of when the codes will be made available from EIOPA.	
Re - J2- cell AM1	If codes are to be provided by EIOPA, it will need to be clarified how EIOPA will develop this database, one option is to request companies to send in details of the counterparty in advance for EIOPA to develop the codes. If this is the option chosen then a timeline will need to be put in place to allow companies gather the relevant data and an indication of when the codes will be made available from EIOPA.	
Re - J2- cell AO1		
Re - J2- cell AP1		
Re - J2- cell AQ1		
Re - J3- General		
Re - J3- Purpose		
Re - J3- Benefits		
Re - J3- Costs	The detailed required is information readily available to the company but requires extraction of data from several different sources and will also require continuous maintenance and for the data streams to reconcile. Systems need to be able to cross	

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	check with technical provision forms. Even though a company may already maintain this data, the cost of correlating and monitoring the data may be significant. The level of detail required will be burdensome for a small entity.	
Re - J3- Groups		
Re - J3- Materiality		
Re - J3- Disclosure		
Re - J3- Frequency		
Re - J3- cell A1		
Re - J3- cell B1	If codes are to be provided by EIOPA will this require companies to send in details of the counterparty in advance for EIOPA to develop the codes. A timeline will need to be put in place to allow companies gather the relevant data and an indication of when the codes will be made available frion EIOPA.	
Re - J3- cell C1		
Re - J3- cell D1		
Re - J3- cell E1		
Re - J3- cell F1		
Re - J3- cell G1		
Re - J3- cell H1	If codes are to be provided by EIOPA will this require companies to send in details of the counterparty in advance for EIOPA to develop the codes. A timeline will need to be put in place to allow companies gather the relevant data and an indication of when the codes will be made available frion EIOPA.	
Re - J3- cell I1		
Re - J3- cell J1		
Re - J3- cell L1		
Re - J3- cell M1		
Re - J3- cell O1		
Re - J3- cell P1		

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Re - J3- cell Q1		
Re - J3- cell R1		
SPV - General		
SPV - Purpose		
SPV - Benefits		
SPV - Costs	The detailed required is information that is readily available to the company but requires extraction of data from several different sources and will also require continuous maintenance and for the data streams to reconcile. Even though a company may already maintain this data, the cost of correlating and monitoring the data may be significant. The level of detail required will be burdensome for a small entity.	
SPV - Groups		
SPV - Materiality		
SPV - Disclosure		
SPV - Frequency		
SPV- cell A1		
SPV- cell B1		
SPV- cell B1A		
SPV- cell C1		
SPV- cell D1		
SPV- cell E1		
SPV- cell F1		
SPV- cell F1A		
SPV- cell G1		
SPV- cell H1		
SPV- cell I1		

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SPV- cell J1		
SPV- cell K1		
SPV- cell L1		
SPV- cell M1		
SPV- cell N1		
SPV- cell O1		
SPV- cell P1		
SPV- cell Q1		
SPV- cell R1		
SPV- cell S1		
SPV- cell T1		
SPV- cell V1		
SPV- cell W1		
SPV- cell X1		
SPV- cell Y1		
SPV- cell Z1		
G01-Purpose		
G01-Benefits		
G01-Costs	The costs associated with the completion of this template will be ongoing as a result of any changes within the group structure and the inclusion of figures in cells H1 to L1, which are required to be updated on an annual basis. However we accept that not all the data will need to be collected annually.	
G01-Application		
G01-Materiality		
G01-Disclosure		
G01-Frequency		
G01- cell A1		

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G01- cell B1	It would be helpful to understand whether the EEA reference number is a new reference number which EIOPA will allocate or current reference numbers issued by local regulators. If the former, when will this be available?	
G01- cell C1		
G01- cell D1		
G01- cell E1		
G01- cell F1		
G01- cell G1		
G01- cell H1	<p>We do not support the instruction in the LOG file that figures should be provided net of IGTs. It would be overly burdensome to insist that groups should allocate IGTs to each legal entity. We also consider that gross of IGTs would be more appropriate to meet the stated purpose of getting an „overview of the group activity“. We further note that collecting these figures net of IGTs would be inconsistent with the instructions for cells I1 to L1 which make no reference to IGTs.</p> <p>Subject to our comments below, we would support the proposal that the group reporting currency is used for the figures in cells H to L.</p> <p>Further clarification is required for the term „Total Balance Sheet“ since this is not a term used on the balance sheet template BS-C1.</p> <p>We would propose that to meet the purpose of getting an „overview of the group activity“, the following cells should be included on G01:</p> <ol style="list-style-type: none"> <li>1) „Total Assets“ on a Solvency II basis, gross of IGTs</li> <li>2) „Total Liabilities“ on a Solvency II basis, gross of IGTs</li> </ol> <p>These are clearly defined items in the Solvency II regulation and hence this would help to provide more consistency in Pillar 3 reporting. These would also provide a better indication of the size of the legal entity than for example own funds.</p>	

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	Given there is no performance statement within the Solvency II regime, cells I1 to L1 would need to be completed on an accounting basis. There is currently a wide range of accounting bases across the EU and this is not disturbed by the introduction of Solvency II. Defining performance measures would be an unduly complex task for EIOPA given Solvency II is not intended to design a measure for profit. We therefore recommend that cells I1 to L1 are deleted. If a performance measure is required by EIOPA, we consider that, this should be the „bottom line“ accounting result, for example, „total comprehensive income for the year“ for IFRS reporters.	
G01- cell I1	We propose cells I1 to L1 are deleted as described above and for the reasons given in our response to cell H1.	
G01- cell J1	We propose cells I1 to L1 are deleted as described above and for the reasons given in our response to cell H1.	
G01- cell K1	We propose cells I1 to L1 are deleted as described above and for the reasons given in our response to cell H1.	
G01- cell L1	We propose cells I1 to L1 are deleted as described above and for the reasons given in our response to cell H1.	
G01- cell M1	The LOG incorrectly refers to „J1 to O1“ rather than „M1 to O1“. We consider that the difference between cells M1 and N1 could for example be the result of options to increase capital share which could give rise to a higher % under accounting standards (N1) compared with the % in current legal form (M1). We consider it would be helpful to specify this as a potential reason for differences between cells M1 and N1.	
G01- cell N1		
G01- cell O1		
G01- cell P1	It would be helpful if this were a closed list of items to ensure consistency.	
G01- cell Q1		
G01- cell R1		
G01- cell S1	We propose this cell is deleted since it can be derived from cell V1, provided the closed list for V1 includes a „Not included“ category.	
G01- cell T1		

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G01- cell U1		
G01- cell V1	We suggest „Consolidation / partial integration“ is replaced with „Consolidation / proportionate integration“, although note that proportionate consolidation as defined in IAS 31 will not be an available option under IFRS from 1 January 2013.	
G03 & G04-Purpose	It would be helpful to improve the clarity of the G03 template by including an additional column to report the equivalence status of the (re)insurance entity. We propose this is from a closed list: 1) Equivalent 2) Not equivalent 3) Pending equivalence decision 4) Not yet considered. We propose that the references in the LOG file referring to Q1 and R1 be deleted.	
G03 & G04-Benefits		
G03 & G04-Costs		
G03 & G04-Application		
G03 & G04-Materiality		
G03 & G04-Disclosure		
G03 & G04-Frequency		
G03- cell A1	For G03- cell A2 (for which there is no comment box in this template), if it is intended that this is the same reference number disclosed in G01-cell B1,we suggest this is deleted as a requirement here to avoid unnecessary duplication.	
G03- cell B1	We assume the LOG file is meant to include SCR-B2C and that its exclusion is a typo.	
G03- cell C1		
G03- cell D1	It is not clear whether this is intended to mean eligible to meet SCR or eligible to meet the MCR. We recommend the former only is required or, if EIOPA considers both items necessary, two columns are provided.	
G03- cell E1	We do not consider the information requested in cells E1 – G1 is appropriate data for the QRTs. This more narrative disclosure would be much better disclosed in narrative form in the RSR, otherwise the potential value of this information is diminished as a result of having to summarise it to such an extent to make it fit into a quantitative style table. We would question the value to the supervisor of having such broad data such as „market“, which is the example given in the LOG for cell-G1.	
G03- cell F1	See comments above for G03 – cell E1	

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G03- cell G1	See comments above for G03 – cell E1	
G03- cell H1		
G03- cell I1		
G03- cell J1		
G03- cell K1		
G03- cell L1		
G03- cell M1		
G03- cell N1	This figure can only be provided where there is a prudential capital requirement specified in the local legislation. Where this does not exist, we propose this is left blank.	
G03- cell O1	We support EIOPA’s direction that this column should be left blank if there is only one intervention point.	
G03- cell P1		
G04- cell A1	The LOG file should be clarified that only entities regulated under a prudential capital regime are intended to be captured in this template to avoid confusion around entities which are regulated under conduct of business regulation but have no imposed capital requirements.	
G04- cell A2	If it is intended that this is the same reference number disclosed in G01-cell B1,we suggest this is deleted as a requirement here to avoid unnecessary duplication.	
G04- cell B1	We assume the closed list is „notional“ or „sectoral“. We recommend that mixed activity holding companies are not included since the stated purpose i.e. to give an overview of the <b>capital requirements</b> is not applicable.	
G04- cell C1		
G04- cell D1		
G04- cell E1	It is not clear whether this is intended to mean eligible to meet the SCR equivalent or eligible to meet the MCR equivalent. We recommend the former only is required or, if EIOPA considers both items necessary, two columns are provided.	
G14-Purpose	We do not consider this template should have a total row. Given TP balances are in original currency, a summation is meaningless. The only columns for which a total row would make sense would be the % columns (E1, H1, K1, N1, Q1) where this	

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	would show the total of 100%.	
G14-Benefits		
G14-Costs		
G14-Application		
G14-Materiality		
G14-Disclosure		
G14-Frequency		
G14- cell A1	If it is intended that this is the same reference number disclosed in G01-cell B1,we suggest this is deleted as a requirement here to avoid unnecessary duplication.	
G14- cell B1		
G14- cell C1		
G14- cell D1		
G14- cell E1		
G14- cell F1		
G14- cell G1		
G14- cell H1		
G14- cell I1		
G14- cell J1		
G14- cell K1		
G14- cell L1		
G14- cell M1		
G14- cell N1		
G14- cell O1		
G14- cell P1		
G14- cell Q1		
G14- cell R1		

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G20-Purpose		
G20-Benefits		
G20-Costs		
G20-Application		
G20-Materiality		
G20-Disclosure		
G20-Frequency		
G20- cell A1		
G20- cell B1		
G20- cell C1		
G20- cell D1		
G20- cell E1		
G20- cell F1		
G20- cell I1		
G20- cell J1		
G20- cell K1		
IGT1 to IGT4-Purpose	This refers to Level 3 guidelines which have only been shared with a limited number of insurance industry participants and stakeholders and not publicly. Those stakeholders which have not have access are therefore at a disadvantage in not being in a position to respond effectively to this consultation. We suggest that once these guidelines are made public, these templates should be consulted on again.	
IGT1 to IGT4-Benefits	It is unclear what the benefits are of collecting all such IGTs within a reporting period given the majority of data required under Solvency II is at a point in time. Requiring all such transactions results in additional complexity and cost. We recommend that only IGTs outstanding at the reporting date are disclosed.  Very significant IGTs during reporting periods would be reported under Article 245(2)	

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	as soon as practicable which should provide sufficient supervisory oversight.	
IGT1 to IGT4-Costs	The costs are highly dependent on the thresholds determined and hence it is not possible to provide a meaningful assessment of the potential costs of this template. Whilst the information on IGTs will exist in the group, this detailed transactional data may not be collected at group level. It is vital that only transactional data required for the purposes of adequate risk management is collected to avoid significant burden and cost in producing and validating / reviewing these templates. We note that this is EIOPA's intention under potential costs in the summary document and support this objective.	
IGT1 to IGT4-Application		
IGT1 to IGT4-Materiality	We support EIOPA's objective of harmonising threshold levels across groups, by which we understand that thresholds will be established that are proportionate and follow consistent guidelines and criteria. The text in the summary document is ambiguous when it refers to „threshold levels are harmonised across groups“. Does this mean between different insurance groups to ensure harmonisation within the EU market or within a specific insurance group to ensure harmonisation within that group? We consider that requirements are harmonised across the EU insurance market such that proportionate disclosure is made on IGTs. For insurance groups of broadly similar sizes and risk profiles but where one performs more IGTs than the other, we would expect similar thresholds to be set resulting in more disclosure from the group with more IGTs. A percentage of Group SCR, for example, could be used as a guide for setting these thresholds, as proposed in the pre-consultation paper.  Thresholds should be established well in advance of the first reporting deadline to allow time for the group to design and implement processes and systems to collate the data.	
IGT1 to IGT4-Disclosure		
IGT1 to IGT4-Frequency		
IGT1- cell B6		

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IGT1- cell C6		
IGT1- cell D6		
IGT1- cell E6		
IGT1- cell F6	It is assumed that where this is not applicable this can be left blank. It would be helpful for the LOG file to specify this explicitly.	
IGT1- cell G6		
IGT1- cell H6	We suggest that the threshold or thresholds set by the group supervisor for the template is / are reported at the top of the template in the reporting currency of the group. Having it as a column would lead to unnecessary repetition since it would not make sense to set thresholds on a transaction by transaction basis.	
IGT1- cell I6		
IGT1- cell J6		
IGT1- cell K6		
IGT1- cell L6		
IGT1- cell M6		
IGT1- cell N6		
IGT1- cell O6		
IGT1- cell P6		
IGT1- cell Q6		
IGT1- cell R6		
IGT1- cell S6		
IGT2- cell B6		
IGT2- cell C6		
IGT2- cell D6		
IGT2- cell E6		
IGT2- cell F6	See comments above for IGT1 – cell F6.	
IGT2- cell G6		

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IGT2- cell H6	See comments above for IGT1 – cell H6.	
IGT2- cell I6	The implication of the direction in the LOG file is that a repo transaction is split into the cash transaction which would be reported on IGT1 and the forward contract on IGT2. We recommend this is clarified explicitly in the guidance to avoid different interpretations.	
IGT2- cell J6		
IGT2- cell K6		
IGT2- cell L6		
IGT2- cell M6		
IGT2- cell N6		
IGT2- cell O6		
IGT2- cell P6	Please specify the closed list, which we assume would include at least micro-hedging, macro-hedging and trading (short term realisation of profits).	
IGT2- cell Q6		
IGT2- cell R6		
IGT2- cell S6		
IGT2- cell T6		
IGT2- cell U6		
IGT2- cell V6		
IGT2- cell W6		
IGT3- cell B6		
IGT3- cell C6		
IGT3- cell D6		
IGT3- cell D6		
IGT3- cell E6		
IGT3- cell F6	See comments above for IGT1 – cell H6.	
IGT3- cell G6		

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IGT3- cell H6	Where no such expiry date is specified in the reinsurance contract, it is assumed this can be left blank. It would be helpful for the LOG file to specify this explicitly.	
IGT3- cell I6		
IGT3- cell J6	The closed list includes financial reinsurance. We suggest that if EIOPA seeks specific contractual features to be disclosed on financial reinsurance that a definition of financial reinsurance is provided, otherwise we expect diverse practice / interpretations are likely to develop diminishing the objective of comparability of the template.	
IGT3- cell K6		
IGT3- cell L6	We suggest that the use of the word „unlimited“ would be less confusing than „999999“ where there is no maximum cover under the treaty.	
IGT3- cell M6	<p>Consistent with our comments on IGT1 to IGT4-Benefits, we consider the template should only capture IGTs at the reporting date and hence cell M6 should capture the reinsurance payable figure in the balance sheet rather than an income statement balance.</p> <p>If EIOPA decides to reject this proposal, we suggest this figure is claims <b>payable</b> rather than claims <b>paid</b>. An accruals basis figure will give more meaningful year on year comparisons and will be more easily reconciliable back to the statutory accounts.</p>	
IGT3- cell N6	As for IGT3 – cell M6, it would be more meaningful to define the reinsurance result in terms of premiums, claims and commissions payable / receivable i.e. on an accruals basis. This would make the figure more consistent with the statutory accounts basis.	
IGT3- cell O6		
IGT4- cell B5		
IGT4- cell C5		
IGT4- cell D5		
IGT4- cell E5		
IGT4- cell F5	See comments above for IGT1 – cell H6.	
IGT4- cell G5		

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IGT4- cell H5		
IGT4- cell I5		
IGT4- cell J5		
IGT4- cell K5		
IGT4- cell L5	This information is not suitable to be collected in a table format since it is narrative information. We suggest that only a Yes or No answer is possible where Yes signifies that trigger events are applicable and No where these are not. Where this is the case, details of the trigger event should be required in the reference document referred to in cell IGT4-P6.	
IGT4- cell M5	<p>The LOG file refers to derivative transactions which would be included on IGT2 rather than IGT4. It is not clear what is meant by the Solvency II value of an internal cost sharing transaction.</p> <p>We propose this is amended to include specific guidance on what is required for each type of IGT, for example:</p> <ul style="list-style-type: none"> <li>- Solvency II value of contingent liability and off balance sheet item</li> <li>- Amount payable during the year for the service provided (for internal cost sharing arrangements)</li> <li>- For other, quantitative details to be provided in the reference documents referred to in cell IGT4-P6.</li> </ul>	
IGT4- cell N5		
IGT4- cell O5		
IGT4- cell P5		
RC-Purpose	<p>We support EIOPA's preference to require only narrative disclosure, supported by figures, rather than a specific template in the QRTs. This would be a more appropriate way of capturing the information that supervisors need to assess concentration risk. Insurers will take different approaches to counterparty risk concentration that will be difficult to capture in a quantitative data template, for example, different concentration risk methodology. Narrative disclosure would provide supervisors with more meaningful information to challenge.</p> <p>If EIOPA decides to keep a QRT for risk concentration then significant alterations are</p>	

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	necessary since the table attempts to show both aggregated data e.g. name of the group counterparty (cell A2) and exposure level data e.g. rating (cell A7) and maturity (cell A12).	
RC-Benefits	We do not consider that a risk concentration template would provide sufficient benefits for the reason above. Also the detailed asset data templates provide supervisors with a vast amount of data which can be analysed to assess particularly counterparty risk concentration concerns or issues (within an insurer, group or across the industry) as they arise.	
RC-Costs	The costs are highly dependent on the thresholds determined and hence it is not possible to provide a meaningful assessment of the potential costs of this template. It is vital that only data required for the purposes of adequate risk management is collected to avoid significant burden and cost in producing and validating / reviewing these templates.	
RC-Application		
RC-Materiality	We note that „most important“ is not defined so this could lead to a wide variety of interpretations of how to complete the template. It is vital that thresholds are set well in advance so that insurers can produce the required level of detail in the timescales.	
RC-Disclosure	Please specify the simplified version.	
RC-Frequency		
RC- cell A2	The methodology for aggregating disclosures will differ between different insurance groups, for example, on whether state owned banks such as Lloyds Banking Group or RBS should be considered as part of the UK government exposure. Also, as noted above in RC – Benefits, the detailed asset data templates provide supervisors with data to analyse particularly counterparty risk concentration concerns or issues.	
RC- cell A3	This cell does not lend itself to capturing all types of exposure. Given the detailed requirements in cells A7 and A12, as examples, to complete this template would require exposure by exposure granularity which is not envisaged for this cell according to the example provided in the LOG.	
RC- cell A4	Further clarity is needed since this could be interpreted as country of issue or country of incorporation, for example.	
RC- cell A5	See comments above for IGT1 – cell F6.	

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RC- cell A6		
RC- cell A7		
RC- cell A8		
RC- cell A9		
RC- cell A10	A quantitative data cell is not the most appropriate way to capture what could be a long list of entities. If EIOPA wants to retain a QRT for risk concentration then we recommend separate rows could be required or the column should be deleted.	
RC- cell A11	See comments above for RC – cell A10.	
RC- cell A12	The implication of this requirement is that each exposure is provided on a separate row in the template which would defeat the objective of the QRT which is to demonstrate concentration risk i.e. in an aggregated way.	
RC- cell A13		
RC- cell A14		
RC- cell A15		
RC- cell A16		
RC- cell A17		
RC- cell A18		