

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

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

Name of Company:	Groupe Consultatif	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public

Please follow the following instructions for filling in the template:

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

Please send the completed template, in Word Format, to

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cp009@eiopa.europa.eu. Our IT tool does not allow processing of any other formats.

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

Reference	Comment	
General Comment	<p>As a general comment on the Quantitative Reporting Templates we would like to stress the point that reporting requirements in pillar 3 should only comprise quantitative information that has been produced in pillar 1. All additional reporting requirements that were not previously needed miss the purpose. As a consequence, we recommend eliminating all inconsistencies between pillars 1 and 3.</p> <p>Regarding the information to the public, we generally support transparency. But it appears questionable if a quarterly disclosure of templates to the public will bring much benefit for the addressees. An annual disclosure seems more reasonable and sufficient. Together with the narrative reporting the public will then get a good and comprehensive view on the solvency situation of an undertaking.</p> <p>Moreover, we would like to address the question for what purpose exactly all the requested information is needed by supervisory authorities. It appears that a lot of information will be gathered without a clear objective in mind which gives reason to address the issue of proportionality / commensurability.</p> <p>The problem with the variation analysis at this stage is that too detailed templates might dictate too much the area which is still under development. We feel a more principles based approach would be more valuable for the end-user and also stimulate progress in the area instead of formalising it.</p> <p>We would also find it beneficial if there would be references to articles in level 1 or level 2 mandating the requirements in specific cells.</p>	

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3.1		
3.2		
3.3		
3.4		
3.5		
3.6		
4.1		
4.2		
4.3		
4.4	Currently it is not clear where the level of sub-group will apply for a particular group. Greater clarity would be beneficial in this area to enable specific undertakings to plan their reporting requirements.	
4.5	Does this mean only the IG templates apply to mixed-activity holding companies and that none of the G, RC or solo templates applicable to groups apply? It would be helpful to clarify the difference in reporting requirements between mixed-activity holding companies and insurance holding companies.	
4.6		
4.7		
4.8		
4.9		
4.10		
4.11		

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Q1		
Q2		
Q3		
Q4		
Q5		
Q6		
Technical Annex (only for inconsistencies)		
BS-C1 – General	<p>We doubt if a direct, quantitative reconciliation between Solvency II and statutory accounting valuation is reasonable and informative. The pure juxtaposition does not give additional knowledge to the addressee, for the valuation methods being very different. A general, qualitative way of information on reconciliation could be more useful.</p> <p>An annual reporting of this sheet seems to be sufficient. A quarterly reporting will be burdensome and costly.</p>	
BS-C1 – Purpose		
BS-C1 – Benefits		
BS-C1 – Costs		
BS-C1 – Groups		
BS-C1 – Materiality		
BS-C1 – Disclosure		
BS-C1 – Frequency	We agree that a quarterly BS-C1 would be too onerous, and probably not in keeping with the objective of proportionality. The suggested option of only requiring a BS-C1 where part	

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	<p>of the reconciliation reserve cannot be explained (over a specified threshold) by the other information supplied might leave undertakings unsure of whether the BS needs to be completed until the reconciliation reserve is complete. If the BS-C1 then had to be « unexpectedly » completed over a short time period this could lead to additional costs disproportionate to the impact. If supervisors need the reconciliation reserve difference to be explained they could require additional items in the Reconciliation Reserve section of OF-B1Q to explain it, or notes attached to the return. This appears to be covered in the SFCR (Guideline 22(f)).</p>	
BS-C1 - cell AS1		
BS-C1- cell AS24		
BS-C1- cell A2		
BS-C1- cell AS2		
BS-C1- cell A26		
BS-C1- cell AS26		
BS-C1- cell A25B	<p>What is the treatment of pension benefit deficits and on what basis should these be valued (IAS19?).</p>	
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		

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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		
BS-C1- cell AS9B		
BS-C1- cell AS9C		
BS-C1- cell AS9D		
BS-C1- cell AS9E		
BS-C1- cell AS9F		
BS-C1- cell A10A		
BS-C1- cell AS10A		
BS-C1- cell A10B		
BS-C1- cell AS10B		
BS-C1- cell A14		
BS-C1- cell AS14		
BS-C1- cell A11		
BS-C1- cell AS11		
BS-C1- cell A12		
BS-C1- cell AS12		

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BS-C1- cell A14A		
BS-C1- cell AS14A		
BS-C1- cell A17		
BS-C1- cell AS17		
BS-C1- cell A18		
BS-C1- cell AS18		
BS-C1- cell A18A		
BS-C1- cell AS18A		
BS-C1- cell A19		
BS-C1- cell AS19		
BS-C1- cell A19A		
BS-C1- cell AS19A		
BS-C1- cell A13		
BS-C1- cell AS13		
BS-C1- cell A21		
BS-C1- cell AS21		
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		

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BS-C1- cell L2		
BS-C1- cell L3		
BS-C1- cell LS4		
BS-C1- cell L4A		
BS-C1- cell L5		
BS-C1- cell L6		
BS-C1- cell LS6B		
BS-C1- cell L6C		
BS-C1- cell L6D		
BS-C1- cell L6E		
BS-C1- cell LS7		
BS-C1- cell L7A		
BS-C1- cell L8		
BS-C1- cell L9		
BS-C1- cell LS10		
BS-C1- cell L10A		
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		

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BS-C1- cell LS17		
BS-C1- cell L16		
BS-C1- cell LS16		
BS-C1- cell L19		
BS-C1- cell LS19		
BS-C1- cell L20		
BS-C1- cell LS20		
BS-C1- cell L15A		
BS-C1- cell LS15A		
BS-C1- cell L15B		
BS-C1- cell LS15B		
BS-C1- cell L15C		
BS-C1- cell LS15C		
BS-C1- cell L15D		
BS-C1- cell LS15D		
BS-C1- cell L25		
BS-C1- cell LS25		
BS-C1- cell L26		
BS-C1B – General		
BS-C1B – Purpose	Could the stated purpose of « giving an overall overview of off-balance items, which could impact the financial position of the undertaking » be achieved equally well by the ORSA? E.g. List of triggering events – possibly not appropriate for a Quantitative Reporting template, more appropriate for the ORSA?	
BS-C1B – Benefits		
BS-C1B – Costs		

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BS-C1B – Groups		
BS-C1B – Materiality		
BS-C1B - Disclosure		
BS-C1B – Frequency		
BS-C1B- cell A2		
BS-C1B- cell A3A		
BS-C1B- cell A3C		
BS-C1B- cell B3C		
BS-C1B- cell C3C		
BS-C1B- cell D3C		
BS-C1B- cell A3B		
BS-C1B- cell B3B		
BS-C1B- cell A10		
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		

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BS-C1B- cell B17		
BS-C1B- cell A17A		
BS-C1B- cell B17A		
BS-C1B- cell A18		
BS-C1B- cell A5		
BS-C1B- cell A9A		
BS-C1B- cell A9B		
BS-C1B- cell B9B		
BS-C1B- cell C9B		
BS-C1B- cell A19		
BS-C1B- cell B19		
BS-C1D – General		
BS-C1D – Purpose		
BS-C1D – Benefits		
BS-C1D – Costs		
BS-C1D – Groups		
BS-C1D – Materiality		
BS-C1D - Disclosure		
BS-C1D – Frequency		
BS-C1D- cell A1		
BS-C1D- cell B1		
BS-C1D- cell C1		
BS-C1D- cell D1		
BS-C1D- cell E1		

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BS-C1D- cell A3		
BS-C1D- cell A4		
BS-C1D- cell A5		
BS-C1D- cell A5A		
BS-C1D- cell A6		
BS-C1D- cell A7		
BS-C1D- cell A8		
BS-C1D- cell A9		
BS-C1D- cell A10		
BS-C1D- cell A11		
BS-C1D- cell A12		
BS-C1D- cell A13		
BS-C1D- cell A14		
BS-C1D- cell A16		
Country - K1- General		
Country - K1- Purpose		
Country - K1- Benefits		
Country - K1- Costs		
Country - K1- Groups		
Country - K1- Materiality		
Country - K1- Disclosure		
Country - K1- Frequency		
Country - K1- cell A1		
Country - K1- cell A2		
Country - K1- cell A3		
Country - K1- cell A4		

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Country - K1- cell C1		
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		
Country - K1- cell H2		
Country - K1- cell H3		
Country - K1- cell H1A		
Country - K1- cell H2A		
Country - K1- cell H3A		
Cover - A1A & Q- General	Unclear how written premium links to the cash-flow view on premiums – hence a precise definition is required i.e. is it premium written or premium received	
Cover - A1A & Q- Purpose		
Cover - A1A & Q- Benefits		
Cover - A1A & Q- Costs		
Cover - A1A & Q- Groups		
Cover - A1A & Q- Materiality		
Cover - A1A & Q- Disclosure		
Cover - A1A & Q- Frequency		
Cover - A1A- cell A1		

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Cover - A1A- cell A2		
Cover - A1A- cell A3		
Cover - A1A- cell A4		
Cover - A1A- cell A5		
Cover - A1A- cell A6		
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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		
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Cover - A1A- cell B2		
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Cover - A1A- cell F1		
Cover - A1A- cell G1		
Cover - A1A- cell E1A		

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Cover - A1A- cell F1A		
Cover - A1A- cell G1A		
Cover - A1A- cell E1B		
Cover - A1A- cell F1B		
Cover - A1A- cell G1B		
Cover - A1A- cell E1C		
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Cover - A1A- cell I10		

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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		
Cover - A1A- cell M1A		
Cover - A1A- cell O1		
Cover - A1A- cell P1		
Cover - A1A- cell O1A		
Cover - A1A- cell P1A		
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Cover - A1A- cell P1B		
Cover - A1A- cell O1C		
Cover - A1A- cell P1C		
Cover - A1Q- cell A1		
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Cover - A1Q- cell A11		
Cover - A1Q- cell A12		
Cover - A1Q- cell A19	Splitting by country quarterly might be disproportionate, (especially given Country-K1 is only required annually)	
Cover - A1Q- cell A20	Splitting by country quarterly might be disproportionate, (especially given Country-K1 is only required annually)	
Cover - A1Q- cell A21	Splitting by country quarterly might be disproportionate, (especially given Country-K1 is only required annually)	
Cover - A1Q- cell A22	Splitting by country quarterly might be disproportionate, (especially given Country-K1 is only required annually)	
Cover - A1Q- cell A23	Splitting by country quarterly might be disproportionate, (especially given Country-K1 is only required annually)	
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		

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Cover - A1Q- cell I3		
Cover - A1Q- cell I3A		
Cover - A1Q- cell I3B		
Cover - A1Q- cell I4		
Cover - A1Q- cell I5		
Cover - A1Q- cell I6		
Cover - A1Q- cell I7	Splitting by country quarterly might be disproportionate, (especially given Country-K1 is only required annually)	
Cover - A1Q- cell I8	Splitting by country quarterly might be disproportionate, (especially given Country-K1 is only required annually)	
Cover - A1Q- cell I9	Splitting by country quarterly might be disproportionate, (especially given Country-K1 is only required annually)	
Cover - A1Q- cell I10	Splitting by country quarterly might be disproportionate, (especially given Country-K1 is only required annually)	
Cover - A1Q- cell I11	Splitting by country quarterly might be disproportionate, (especially given Country-K1 is only required annually)	
Cover - A1Q- cell L1		
Cover - A1Q- cell M1		
Cover - A1Q- cell L1Z		
Cover - A1Q- cell M1Z		
OF - B1A & B1Q – General	With regard to the Cover note (CP9a) question on a possible analysis tool of the Reconciliation Reserve – consider separating difference in L18-LS18 and L23. The new design of the Own Funds template relates to a significant increase of granularity. All Own Funds items have to be shown in detail on the reporting date as	

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well as all movements during the reporting period have to be reported.

The excessive and unnecessary complexity of the new Own Funds reporting requirements will create a costly, burdensome and hard-to-handle process for the European insurance industry. Therefore the Own Fund reporting should be revised; the reporting need only focus on data that will allow supervising authorities to derive "quality and quantity" (as stated in the Directive 2009/138). All add on and unnecessary data for this aim must be deleted (e.g. movement data, split up from reconciliation reserve, information concerning: EPIFP, nominal values, buy back during the year etc.). Furthermore cost-benefits aspects and materiality must be considered.

We disagree with the detailed level of the public disclosure requirements. It is much too detailed. In particular we don't agree to the idea of public disclosure the EPIFP. We support the approach of including EPIFP in Tier 1 as part of the reconciliation reserve. Any tiering of EPIFP would result in double-counting of risks which are already taken into consideration in the calculation of both technical provisions and the SCR. While we acknowledge the importance of liquidity risk management in general, we do not understand the rationale behind monitoring EPIFP separately from other cash inflows and cash outflows. We do not think it would make sense to identify EPIFP separately as the concept of EPIFP seems to be contradictory to the economic balance sheet approach under Solvency II. It appears to be unclear which concern the concept of EPIFP is trying to address and why the identification of this particular aspect of expected cash inflows is necessary to achieve the Solvency II objectives.

Tiering limits on Own Funds as detailed in Article 98 SII-Directive and Article 72 EOF1 delegated acts give room for interpretation. In our view it should be clarified that all available own funds are eligible as long as they conform with Article 98 SII-Directive, i.e. if tier 1-capital is at least 50% of the SCR and tier 3-capital is not exceeding 1/3 the SCR all other own funds are completely eligible. Limiting own funds (i.e. own funds are not allowed to use to cover the SCR) is not in line with the directive. In addition to this, an incomplete description of the risk, finance and result situation of an undertaking will be given. We oppose this.

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OF - B1A & B1Q – Purpose		
OF - B1A & B1Q – Benefits		
OF - B1A & B1Q – Costs		
OF - B1A & B1Q – Groups		
OF - B1A & B1Q – Materiality		
OF - B1A & B1Q - Disclosure		
OF - B1A & B1Q – Frequency		
OF - B1A- cell C1A		
OF - B1A- cell B5		
OF - B1A- cell C5		
OF - B1A- cell D5		
OF - B1A- cell B6		
OF - B1A- cell B10		
OF - B1A- cell C10		
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OF - B1A- cell C14		
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OF - B1A- cell B18		
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OF - B1A- cell D18		
OF - B1A- cell D14		
OF - B1A- cell D11		
OF - B1A- cell D15		
OF - B1A- cell B25		
OF - B1A- cell B30		
OF - B1A- cell B31		
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OF - B1A- cell A45		
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OF - B1A- cell A45B		

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OF - B1A- cell B60		
OF - B1A- cell C60		
OF - B1A- cell B61		
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OF - B1A- cell D75		
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OF - B1A- cell J77.n		
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OF - B1A- cell B85		
OF - B1A- cell C85		
OF - B1A- cell D85		
OF - B1A- cell A87.1		
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OF - B1A- cell B104		
OF - B1A- cell C104		
OF - B1A- cell D104		
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OF - B1A- cell D106.1		

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OF - B1A- cell B108		

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OF - B1A- cell B110		
OF - B1A- cell C110		
OF - B1A- cell D110		
OF - B1A- cell E110		
OF - B1A- cell B111		
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OF - B1A- cell D111		
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OF - B1A- cell A113.1		
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OF - B1A- cell E113.n		
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OF - B1A- cell B115.n		
OF - B1A- cell D115.n		
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OF - B1A- cell B116		
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OF - B1A- cell F116		
OF - B1A- cell A130.1		
OF - B1A- cell B130.1		
OF - B1A- cell C130.1		
OF - B1A- cell D130.1		
OF - B1A- cell E130.1		
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OF - B1A- cell G130.n		
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OF - B1A- cell L130.n		
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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		
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OF - B1Q- cell D11		
OF - B1Q- cell D15		
OF - B1Q- cell B25		
OF - B1Q- cell B30		
OF - B1Q- cell B31		
OF - B1Q- cell C33		
OF - B1Q- cell C34		
OF - B1Q- cell C35		
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	The prescriptive approach to the specific steps and order of steps in the analysis of	

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	<p>movement in own funds could represent considerable change from existing reconciliation processes where existing reconciliation processes might already sufficiently explain the main reasons for the change in own funds. For example, the definition of contract boundaries may result in certain subsets of premiums, and their associated claims and technical provisions, being defined as new business hence resulting in additional granularity of information but adding little to the overall analysis. Equally some of the specific items in the reconciliation do not necessarily match back to existing accounting entries. Where possible, and taking into account the principles of materiality and proportionality, a pragmatic approach should be possible so that all material items in the reconciliation are represented so as to give the undertaking and the supervisor an acceptable assessment of the main reasons for the change in own funds.</p> <p>In our view the analysis of change should rather have been developed as part of the SCR and balance-sheet discussions – and not introduced here at a late stage as part of the reporting, as it has significant consequences for the analysis required by firms. The split between current year and previous years might not bring additional value from a risk driver perspective – could possibly be simplified</p>	
VA – C2A – Purpose		
VA – C2A – Benefits		
VA – C2A – Costs	There could be material extra costs associated with running the different calculations.	
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		

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VA - C2B – Materiality		
VA - C2B – Disclosure		
VA – C2B – Frequency		
VA C2B - cell AA2	Are (re)insurance obligations assumed to include or exclude the SCR?	
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		
VA C2B -cell O1	It is unclear what the “check BS C1” comment requires – is this a check that will be included in a later version, or is the user required to check this themselves? It is also unclear what this section “Summary of Investment Balance Sheet variation” is for, is this just to provide a check on the A9=O4 value? It does not appear to affect the figures in “Overview”	
VA C2B -cell O2		
VA C2B -cell O3		
VA - C2C- General	<p>The new proposal looks like a profit and loss rather than a pure risk approach.</p> <p>The implementation effort of the VA-template will be very high, especially for template C2C and undertakings will have major problems fulfilling the requirements of variation analysis.</p> <p>The required information is too granular and cannot be fulfilled with recent analytical tools by the majority of undertakings. Several cash flows have to be generated with sequential changes in parameters, e.g. interest rate for old and new business, gross</p>	

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	<p>and net reinsurance etc. This is very burdensome and very costly (time consuming).</p> <p>The new detailed reporting requirement of cash flows for risk accepted during the reporting period seems very problematic. The separation of investments held in the opening balance sheet and the new acquired investments during the period is not possible.</p> <p>The variation analysis for investments is very critical. The variations of assets can only be analysed for the whole investment portfolio and it is not possible to analyse these variations only for the basic own funds. The previous QRT was more suited for the variation analysis of assets.</p> <p>The QRT should not require a variation analysis separated by lines of business. Instead the previous approach to separate by assumptions (biometry, lapse/surrender, cost) was more suited.</p> <p>The impact of reinsurance has to be reported at too granular a level.</p>	
VA – C2C – Purpose	<p>We appreciate the purpose to give a more detailed view on the change of Basic own funds by source of change. Generally, the differentiation between risks already recognized in the prior economic balance sheet (i.e. risks accepted prior to period) and and those risks, that are recognized the first time at the end of the current economic balance sheet (i.e. risks accepted during period), seems reasonable, although this split is only relevant within this one QRT and remarkable efforts will be necessary to provide this split via system support with reliable results.</p> <p>However, the level of detail regarding reinsurance recoverables seems not feasible, especially taking into account the split between risks accepted during period an risk accepted prior to period. Expected reinsurance recoverable based on reinsurance contracts, especially for those on a non-proportional basis, cannot be split in a reasonable way onto risks accepted during the period and those accepted prior to the period. From the actuarial perspective, there is no value added using some allocation algorithm to allocate the expected Best Estimate from reinsurance contracts onto the requested level of detail.</p>	

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	<p>Therefore we suggest not to split the reinsurance recoverables into risks accepted during and prior to period; unwinding effects and effects of changes in the discount rate might be shown separately, all other effects should be shown only as one figure, similar to the risk margin.</p> <p>Regarding the effects to be analyzed for (gross) business accepted prior to tperiod, we would mention the following: In Non-Life (re)insurance, the future cash flows are not modeled on explicit assumptions like mortality tables and lapse rates as used in the life (re)insurance, but the projection methods to assess the (undiscounted) total amount of the Best Estimate rather provide assumptions regarding the development of future cash flows. E.g. when the Chain Ladder method, based on paid loss development triangles is used to project the Ultimate loss per Underwriting or Accident year, the development factors resulting from the projection represent the expected development of the future cash flows of the respective Underwriting/ Accident year. Therefore, the impact from experience will only result from changes in the Best Estimate of claims already incurred at the end of the period (i.e. the BE of claims provisions as at the year end). The impact of assumption changes are only changes in the undiscounted BE of Premium Provisions of those risks, that were shown as premium provisions at the beginning of the year and are still included in the premium provisions at year end.</p> <p>It is still unclear, whether commissions in relation to (ceded) reinsurance have to be recognized as sdeduction within the gross expenses or as part of the reinsurance recoverables.</p>	
VA – C2C – Benefits		
VA – C2C - Costs		
VA – C2C – Groups		
VA - C2C – Materiality	<p>We appreciate the purpose to give a more detailed view on the change of Basic own funds by source of change. Generally, the differentiation between risks already recognized in the prior economic balance sheet (i.e. risks accepted prior to period) and and those risks, that are recognized the first time at the end of the current economic</p>	

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balance sheet (i.e. risks accepted during period), seems reasonable, although this split is only relevant within this one QRT and remarkable efforts will be necessary to provide this split via system support with reliable results.

However, the level of detail regarding reinsurance recoverables seems not feasible, especially taking into account the split between risks accepted during period and risks accepted prior to period. Expected reinsurance recoverable based on reinsurance contracts, especially for those on a non-proportional basis, cannot be split in a reasonable way onto risks accepted during the period and those accepted prior to the period. From the actuarial perspective, there is no value added using some allocation algorithm to allocate the expected Best Estimate from reinsurance contracts onto the requested level of detail.

Therefore we suggest not to split the reinsurance recoverables into risks accepted during and prior to period; unwinding effects and effects of changes in the discount rate might be shown separately, all other effects should be shown only as one figure, similar to the risk margin.

Regarding the effects to be analyzed for (gross) business accepted prior to period, we would mention the following:

In Non-Life (re)insurance, the future cash flows are not modeled on explicit assumptions like mortality tables and lapse rates as used in the life (re)insurance, but the projection methods to assess the (undiscounted) total amount of the Best Estimate rather provide assumptions regarding the development of future cash flows. E.g. when the Chain Ladder method, based on paid loss development triangles is used to project the Ultimate loss per Underwriting or Accident year, the development factors resulting from the projection represent the expected development of the future cash flows of the respective Underwriting/ Accident year. Therefore, the impact from experience will only result from changes in the Best Estimate of claims already incurred at the end of the period (i.e. the BE of claims provisions as at the year end). The impact of assumption changes are only changes in the undiscounted BE of Premium Provisions of those risks, that were shown as premium provisions at the beginning of the year and are still included in the premium provisions at year end.

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	It is still unclear, whether commissions in relation to (ceded) reinsurance have to be recognized as deduction within the gross expenses or as part of the reinsurance recoverables.	
VA - C2C – Disclosure		
VA – C2C – Frequency		
VA C2C -cell AA5	As only the difference in the risk margin (in total) from the beginning of the year until the end of the year is shown here, there is no separate calculation regarding unwinding effect of the riskmargin nor is the effect from changes of the discount rate for the risk margin shown separately.	
VA C2C -cell A1	<p>The example mentioned regarding premiums paid is not even true for contracts with monthly premium payments, as if a contract starts at 01/06/N, at the year end there are already payments made for 7 months.</p> <p>If the premium for a contract, starting 01/07/N is paid annually, the whole premium should be recognized here as premium paid. In this case, no BE for premium cash in is recognized. It should not be the intention to refer to the earned premium, as the BE refers to actual cash flows independent from the financial year, whereas earning effects are only relevant for financial year view (as relevant e.g. for IFRS purposes).</p>	
VA C2C -cell B1		
VA C2C -cell C1		
VA C2C -cell D1		
VA C2C -cell E1	The BE of cash flows seems to be based on the closing discount rate and assumptions. This is likely to result in some anomalies whereby the new business 'result' is impacted by movements in interest rates and other assumptions between the point of sale and the reporting date. This will reduce the meaningfulness of the analysis.	
VA C2C -cell E1A		
VA C2C -cell G1	This cell should include reinsurance premiums also?	

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VA C2C -cell H1	This cell should include reinsurance premiums also?	
VA C2C -cell E1A		
VA C2C -cell A2	From the actuarial perspective, it is reasonable to calculate the unwinding effect based on prior year end Best Estimate (based on former discounting pattern), as it is described here.	
VA C2C -cell B2		
VA C2C -cell D2	<p>From the actuarial perspective, it is reasonable to calculate the effect of changes of discount rates based on prior year end Best Estimates as used for calculation the unwinding effect (see cell A2), taking the unwinding effect into account.</p> <p>In the explanation for cells BB1 To BB8, the effect of changes in discount rates should also include the effects of changes in pattern for discounting, which is contradiction the explanation for cell D2 "effects of changes of discount rate on BE...".</p> <p>The procedure described for cells BB1 to BB8 seems not appropriate from the actuarial perspective, as the change in the pattern used for the discounting of the year end BE is based on experiences made during the year and therefore the effect of using new discounting pattern should be shown as "variation of BE due to experiences..." in cell E4.</p>	
VA C2C -cell E2		
VA C2C -cell G2	Include with AA3 as it is an assumption change?	
VA C2C -cell A3	In Non-Life (re)insurance, the future cash flows are not modeled on explicit assumptions like mortality tables and lapse rates as used in the life (re)insurance, but the projection methods to assess the (undiscounted) total amount of the Best Estimate rather provide assumptions regarding the development of future cash flows. E.g. when the Chain Ladder method, based on paid loss development triangles is used to project the Ultimate loss per Underwriting or Accident year, the development factors resulting from the projection represent the expected development of the future cash flows of the respective Underwriting/ Accident year. Therefore, the impact from experience will only result from changes in the Best Estimate of claims already	

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	incurred at the end of the period (i.e. the BE of claims provisions as at the year end). The impact of assumption changes are only changes in the undiscounted BE of Premium Provisions of those risks, that were shown as premium provisions at the beginning of the year and are still included in the premium provisions at year end.	
VA C2C -cell B3		
VA C2C -cell C3	It would be helpful to split this into economic and non-economic as it is likely this will be done at the same time as the split for A3 and B3.	
VA C2C -cell A4		
VA C2C -cell B4		
VA C2C -cell C4		
VA C2C -cell D4		
VA C2C -cell E4	<p>Regarding consideration of effects due to discount effects resulting from the usage of new discounting pattern: See comment on cell D2.</p> <p>Regarding the distinction between "effects of changes of assumptions.." vs. "variation of BE due to experiences" (already mentioned under "purposes"): In Non-Life (re)insurance, the future cash flows are not modeled on explicit assumptions like mortality tables and lapse rates as used in the life (re)insurance, but the projection methods to assess the (undiscounted) total amount of the Best Estimate rather provide assumptions regarding the development of future cash flows. E.g. when the Chain Ladder method, based on paid loss development triangles is used to project the Ultimate loss per Underwriting or Accident year, the development factors resulting from the projection represent the expected development of the future cash flows of the respective Underwriting/ Accident year. Therefore, the impact from experience will only result from changes in the Best Estimate of claims already incurred at the end of the period (i.e. the BE of claims provisions as at the year end). The impact of assumption changes are only changes in the undiscounted BE of Premium Provisions of those risks, that were shown as premium provisions at the beginning of the year and are still included in the premium provisions at year end.</p>	
VA C2C -cell E4A		

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VA C2C -cell G4	This cell should include reinsurance premiums also?	
VA C2C -cell H4	This cell should include reinsurance premiums also?	
VA C2C -cell BB1	See comments on cell D2. See comments on cell E4.	
VA C2C -cell CC1	<p>As already mentioned under "Purpose":</p> <p>The level of detail regarding reinsurance recoverables seems not feasible, especially taking into account the split between risks accepted during period an risk accepted prior to period. Expected reinsurance recoverable based on reinsurance contracts, especially for those on a non-proportional basis, cannot be split in a reasonable way onto risks accepted during the period and those accepted prior to the period. From the actuarial perspective, there is no value added using some allocation algorithm to allocate the expected Best Estimate from reinsurance contracts onto the requested level of detail.</p> <p>Therefore we suggest not to split the reinsurance recoverables into risks accepted during and prior to period; unwinding effects and effects of changes in the discount rate might be shown separately, all other effects should be shown only as one figure, similar to the risk margin.</p>	
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		

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VA C2D -cell O3		
VA C2D -cell O4		
VA C2D -cell O6		
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		
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		

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SCR - B2A - cell B4		
SCR - B2A - cell A5		
SCR - B2A - cell B5=A5		
SCR - B2A - cell A6		
SCR - B2A - cell B6		
SCR - B2A - cell A7		
SCR - B2A - cell B7=A7		
SCR - B2A - cell A8		
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		

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

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SCR - B2C – Materiality		
SCR - B2C- Disclosure		
SCR - B2C – Frequency		
SCR - B2C- cell A1.1		
SCR - B2C- cell A1A.1		
SCR - B2C- cell B1.1		
SCR - B2C- cell A1.n		
SCR - B2C- cell A1A.n		
SCR - B2C- cell B1.n		
SCR - B2C- cell B3		
SCR - B2C- cell B5		
SCR - B2C- cell B6		
SCR - B2C- cell B7		
SCR - B2C- cell B7A		
SCR - B2C- cell B8A		
SCR - B2C- cell B8B		
SCR - B2C- cell B8C		
SCR - B2C- cell B9		
SCR - B2C- cell B10		
SCR - B2C- cell B11		
SCR - B2C- cell B13		
SCR - B2C- cell B14		
SCR - B2C- cell B15		
SCR - B3A – General		
SCR - B3A – Purpose		

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

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SCR - B3A- cell A4		
SCR - B3A- cell A4A		
SCR - B3A- cell B4		
SCR - B3A- cell B4A		
SCR - B3A- cell C4		
SCR - B3A- cell B4B		
SCR - B3A- cell D4		
SCR - B3A- cell A5		
SCR - B3A- cell B5		
SCR - B3A- cell A6		
SCR - B3A- cell B6		
SCR - B3A- cell A7		
SCR - B3A- cell B7		
SCR - B3A- cell A8		
SCR - B3A- cell A8A		
SCR - B3A- cell B8		
SCR - B3A- cell B8A		
SCR - B3A- cell B8B		
SCR - B3A- cell D8		
SCR - B3A- cell A9		
SCR - B3A- cell B9		
SCR - B3A- cell A10		
SCR - B3A- cell B10		
SCR - B3A- cell A11		
SCR - B3A- cell B11		
SCR - B3A- cell A12		

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SCR - B3A- cell A12A		
SCR - B3A- cell B12		
SCR - B3A- cell B12A		
SCR - B3A- cell C12		
SCR - B3A- cell B12B		
SCR - B3A- cell D12		
SCR - B3A- cell C13		
SCR - B3A- cell D13		
SCR - B3A- cell A14		
SCR - B3A- cell A14A		
SCR - B3A- cell B14		
SCR - B3A- cell B14A		
SCR - B3A- cell C14		
SCR - B3A- cell B14B		
SCR - B3A- cell D14		
SCR - B3A- cell C15		
SCR - B3A- cell D15		
SCR - B3A- cell A16		
SCR - B3A- cell A16A		
SCR - B3A- cell B16		
SCR - B3A- cell B16A		
SCR - B3A- cell C16		
SCR - B3A- cell B16B		
SCR - B3A- cell D16		
SCR - B3A- cell A17		
SCR - B3A- cell A17A		

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SCR - B3A- cell B17		
SCR - B3A- cell B17A		
SCR - B3A- cell C17		
SCR - B3A- cell B17B		
SCR - B3A- cell D17		
SCR - B3A- cell A18		
SCR - B3A- cell A18A		
SCR - B3A- cell B18		
SCR - B3A- cell B18A		
SCR - B3A- cell C18		
SCR - B3A- cell B18B		
SCR - B3A- cell D18		
SCR - B3A- cell A19		
SCR - B3A- cell A19A		
SCR - B3A- cell C19		
SCR - B3A- cell D19		
SCR - B3A- cell A20		
SCR - B3A- cell A20A		
SCR - B3A- cell C20		
SCR - B3A- cell D20		
SCR - B3A- cell A21		
SCR - B3A- cell A21A		
SCR - B3A- cell B21		
SCR - B3A- cell B21A		
SCR - B3A- cell C21		
SCR - B3A- cell B21B		

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SCR - B3A- cell D21		
SCR - B3A- cell C22		
SCR - B3A- cell D22		
SCR - B3A- cell C23		
SCR - B3A- cell D23		
SCR - B3B – General		
SCR - B3B – Purpose		
SCR - B3B – Benefits		
SCR - B3B – Costs		
SCR - B3B – Groups		
SCR - B3B – Materiality		
SCR - B3B - Disclosure		
SCR - B3B – Frequency		
SCR - B3B- cell A0		
SCR - B3B- cell B0		
SCR - B3B- cell A1		
SCR - B3B- cell A1A		
SCR - B3B- cell A2		
SCR - B3B- cell A3		
SCR - B3B- cell A4		
SCR - B3B- cell B6		
SCR - B3B- cell A7		
SCR - B3B- cell A8		
SCR - B3B- cell A9		

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SCR - B3B- cell B9		
SCR - B3C - General		
SCR - B3C - Purpose		
SCR - B3C - Benefits		
SCR - B3C - Costs		
SCR - B3C - Groups		
SCR - B3C - Materiality		
SCR - B3C - Disclosure		
SCR - B3C - Frequency		
SCR - B3C- cell A1		
SCR - B3C- cell A1A		
SCR - B3C- cell B1		
SCR - B3C- cell B1A		
SCR - B3C- cell C1		
SCR - B3C- cell B1B		
SCR - B3C- cell D1		
SCR - B3C- cell A2		
SCR - B3C- cell A2A		
SCR - B3C- cell B2		
SCR - B3C- cell B2A		
SCR - B3C- cell C2		
SCR - B3C- cell B2B		
SCR - B3C- cell D2		
SCR - B3C- cell A3		

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SCR - B3C- cell A3A		
SCR - B3C- cell B3		
SCR - B3C- cell B3A		
SCR - B3C- cell C3		
SCR - B3C- cell B3B		
SCR - B3C- cell D3		
SCR - B3C- cell C04		
SCR - B3C- cell D04		
SCR - B3C- cell A4		
SCR - B3C- cell A4A		
SCR - B3C- cell B4		
SCR - B3C- cell B4A		
SCR - B3C- cell C4		
SCR - B3C- cell B4B		
SCR - B3C- cell D4		
SCR - B3C- cell A5		
SCR - B3C- cell A5A		
SCR - B3C- cell B5		
SCR - B3C- cell B5A		
SCR - B3C- cell C5		
SCR - B3C- cell B5B		
SCR - B3C- cell D5		
SCR - B3C- cell A6		
SCR - B3C- cell A6A		
SCR - B3C- cell B6		
SCR - B3C- cell B6A		

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SCR - B3C- cell C6		
SCR - B3C- cell B6B		
SCR - B3C- cell D6		
SCR - B3C- cell A7		
SCR - B3C- cell A7A		
SCR - B3C- cell B7		
SCR - B3C- cell B7A		
SCR - B3C- cell C7		
SCR - B3C- cell B7B		
SCR - B3C- cell D7		
SCR - B3C- cell A8		
SCR - B3C- cell A8A		
SCR - B3C- cell B8		
SCR - B3C- cell B8A		
SCR - B3C- cell C8		
SCR - B3C- cell B8B		
SCR - B3C- cell D8		
SCR - B3C- cell A9		
SCR - B3C- cell A9A		
SCR - B3C- cell B9		
SCR - B3C- cell B9A		
SCR - B3C- cell C9		
SCR - B3C- cell B9B		
SCR - B3C- cell D9		
SCR - B3C- cell C10		
SCR - B3C- cell D10		

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SCR - B3C- cell C11		
SCR - B3C- cell D11		
SCR - B3C- cell A12		
SCR - B3D - General		
SCR - B3D - Purpose		
SCR - B3D - Benefits		
SCR - B3D - Costs		
SCR - B3D - Groups		
SCR - B3D - Materiality		
SCR - B3D - Disclosure		
SCR - B3D - Frequency		
SCR - B3D- cell A12		
SCR - B3D- cell A12A		
SCR - B3D- cell B12		
SCR - B3D- cell C12		
SCR - B3D- cell D12		
SCR - B3D- cell E12		
SCR - B3D- cell F12		
SCR - B3D- cell A13		
SCR - B3D- cell A13A		
SCR - B3D- cell B13		
SCR - B3D- cell C13		
SCR - B3D- cell D13		
SCR - B3D- cell E13		

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SCR - B3D- cell F13		
SCR - B3D- cell A14		
SCR - B3D- cell A14A		
SCR - B3D- cell B14		
SCR - B3D- cell C14		
SCR - B3D- cell D14		
SCR - B3D- cell E14		
SCR - B3D- cell F14		
SCR - B3D- cell A15		
SCR - B3D- cell A15A		
SCR - B3D- cell B15		
SCR - B3D- cell C15		
SCR - B3D- cell D15		
SCR - B3D- cell E15		
SCR - B3D- cell F15		
SCR - B3D- cell A16		
SCR - B3D- cell A17		
SCR - B3D- cell A18		
SCR - B3D- cell A18A		
SCR - B3D- cell B18		
SCR - B3D- cell B18A		
SCR - B3D- cell C18		
SCR - B3D- cell A19		
SCR - B3D- cell A20		
SCR - B3D- cell A21		
SCR - B3D- cell A22		

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SCR - B3D- cell A23		
SCR - B3D- cell A24		
SCR - B3D- cell A25		
SCR - B3D- cell A26		
SCR - B3D- cell A27		
SCR - B3E – General		
SCR - B3E – Purpose		
SCR - B3E – Benefits		
SCR - B3E – Costs		
SCR - B3E – Groups		
SCR - B3E – Materiality		
SCR - B3E - Disclosure		
SCR - B3E – Frequency		
SCR - B3E- cell A1		
SCR - B3E- cell A1A		
SCR - B3E- cell B1		
SCR - B3E- cell C1		
SCR - B3E- cell D1		
SCR - B3E- cell E1		
SCR - B3E- cell F1		
SCR - B3E- cell A2		
SCR - B3E- cell A2A		
SCR - B3E- cell B2		
SCR - B3E- cell C2		

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SCR - B3E- cell D2		
SCR - B3E- cell E2		
SCR - B3E- cell F2		
SCR - B3E- cell A3		
SCR - B3E- cell A3A		
SCR - B3E- cell B3		
SCR - B3E- cell C3		
SCR - B3E- cell D3		
SCR - B3E- cell E3		
SCR - B3E- cell F3		
SCR - B3E- cell A4		
SCR - B3E- cell A4A		
SCR - B3E- cell B4		
SCR - B3E- cell C4		
SCR - B3E- cell D4		
SCR - B3E- cell E4		
SCR - B3E- cell F4		
SCR - B3E- cell A5		
SCR - B3E- cell A5A		
SCR - B3E- cell B5		
SCR - B3E- cell C5		
SCR - B3E- cell D5		
SCR - B3E- cell E5		
SCR - B3E- cell F5		
SCR - B3E- cell A6		
SCR - B3E- cell A6A		

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SCR - B3E- cell B6		
SCR - B3E- cell C6		
SCR - B3E- cell D6		
SCR - B3E- cell E6		
SCR - B3E- cell F6		
SCR - B3E- cell A7		
SCR - B3E- cell A7A		
SCR - B3E- cell B7		
SCR - B3E- cell C7		
SCR - B3E- cell D7		
SCR - B3E- cell E7		
SCR - B3E- cell F7		
SCR - B3E- cell A8		
SCR - B3E- cell A8A		
SCR - B3E- cell B8		
SCR - B3E- cell C8		
SCR - B3E- cell D8		
SCR - B3E- cell E8		
SCR - B3E- cell F8		
SCR - B3E- cell A9		
SCR - B3E- cell A9A		
SCR - B3E- cell B9		
SCR - B3E- cell C9		
SCR - B3E- cell D9		
SCR - B3E- cell E9		
SCR - B3E- cell F9		

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SCR - B3E- cell A10		
SCR - B3E- cell A10A		
SCR - B3E- cell B10		
SCR - B3E- cell C10		
SCR - B3E- cell D10		
SCR - B3E- cell E10		
SCR - B3E- cell F10		
SCR - B3E- cell A11		
SCR - B3E- cell A11A		
SCR - B3E- cell B11		
SCR - B3E- cell C11		
SCR - B3E- cell D11		
SCR - B3E- cell E11		
SCR - B3E- cell F11		
SCR - B3E- cell A12		
SCR - B3E- cell A12A		
SCR - B3E- cell B12		
SCR - B3E- cell C12		
SCR - B3E- cell D12		
SCR - B3E- cell E12		
SCR - B3E- cell F12		
SCR - B3E- cell A13		
SCR - B3E- cell A14		
SCR - B3E- cell A15		
SCR - B3E- cell A15A		
SCR - B3E- cell B15		

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SCR - B3E- cell B15A		
SCR - B3E- cell C15		
SCR - B3E- cell A16		
SCR - B3E- cell A17		
SCR - B3E- cell A18		
SCR - B3F – General		
SCR - B3F – Purpose		
SCR - B3F – Benefits		
SCR - B3F – Costs		
SCR - B3F – Groups		
SCR - B3F – Materiality		
SCR - B3F - Disclosure		
SCR - B3F – Frequency		
SCR - B3F- cell Summary A1		
SCR - B3F- cell Summary C1		
SCR - B3F- cell Summary A9		
SCR - B3F- cell Summary C9		
SCR - B3F- cell Summary A17		
SCR - B3F- cell Summary C17		
SCR - B3F- cell Summary A26		

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SCR - B3F- cell Summary C26		
SCR - B3F- cell Summary A27		
SCR - B3F- cell Summary C27		
SCR - B3F- cell Windstorm A1		
SCR - B3F- cell Windstorm B1		
SCR - B3F- cell Windstorm C1		
SCR - B3F- cell Windstorm E1		
SCR - B3F- cell Windstorm F1		
SCR - B3F- cell Windstorm G1		
SCR - B3F- cell Windstorm H1		
SCR - B3F- cell Windstorm A2		
SCR - B3F- cell Windstorm B2		
SCR - B3F- cell Windstorm C2		
SCR - B3F- cell Windstorm E2		
SCR - B3F- cell Windstorm F2		
SCR - B3F- cell Windstorm G2		

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SCR - B3F- cell Windstorm H2		
SCR - B3F- cell Windstorm A3		
SCR - B3F- cell Windstorm B3		
SCR - B3F- cell Windstorm C3		
SCR - B3F- cell Windstorm E3		
SCR - B3F- cell Windstorm F3		
SCR - B3F- cell Windstorm G3		
SCR - B3F- cell Windstorm H3		
SCR - B3F- cell Windstorm A20		
SCR - B3F- cell Windstorm B20		
SCR - B3F- cell Windstorm C20		
SCR - B3F- cell Windstorm E20		
SCR - B3F- cell Windstorm F20		
SCR - B3F- cell Windstorm G20		
SCR - B3F- cell Windstorm H20		
SCR - B3F- cell Windstorm A22		

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SCR - B3F- cell Windstorm F22		
SCR - B3F- cell Windstorm G22		
SCR - B3F- cell Windstorm H22		
SCR - B3F- cell Windstorm I22		
SCR - B3F- cell Windstorm F25		
SCR - B3F- cell Windstorm I25		
SCR - B3F- cell Earthquake A1		
SCR - B3F- cell Earthquake B1		
SCR - B3F- cell Earthquake C1		
SCR - B3F- cell Earthquake E1		
SCR - B3F- cell Earthquake F1		
SCR - B3F- cell Earthquake G1		
SCR - B3F- cell Earthquake A2		
SCR - B3F- cell Earthquake B2		
SCR - B3F- cell Earthquake C2		
SCR - B3F- cell Earthquake E2		

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SCR - B3F- cell Earthquake F2		
SCR - B3F- cell Earthquake G2		
SCR - B3F- cell Earthquake A3		
SCR - B3F- cell Earthquake B3		
SCR - B3F- cell Earthquake C3		
SCR - B3F- cell Earthquake E3		
SCR - B3F- cell Earthquake F3		
SCR - B3F- cell Earthquake G3		
SCR - B3F- cell Earthquake A20		
SCR - B3F- cell Earthquake B20		
SCR - B3F- cell Earthquake C20		
SCR - B3F- cell Earthquake E20		
SCR - B3F- cell Earthquake F20		
SCR - B3F- cell Earthquake G20		
SCR - B3F- cell Earthquake A22		
SCR - B3F- cell Earthquake E22		

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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		
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		

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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		
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		

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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		
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		

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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-proportional property reinsurance D1		
SCR - B3F- cell Motor Vehicle Liability A1		
SCR - B3F- cell Motor Vehicle Liability A2		

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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		
SCR - B3F- cell Marine Platform Explosion B5		
SCR - B3F- cell Marine Platform Explosion C5		
SCR - B3F- cell Marine Platform Explosion D5		

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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		
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		

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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		
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		

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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		
SCR - B3F- cell Liability D10		
SCR - B3F- cell Liability E10		
SCR - B3F- cell Liability A12		
SCR - B3F- cell Liability B12		

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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 Default B2		
SCR - B3F- cell Credit & Suretyship Large Credit Default A4		
SCR - B3F- cell Credit & Suretyship Large Credit		

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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-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-		

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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 Accident A1		
SCR - B3F- cell Mass Accident B1		
SCR - B3F- cell Mass Accident C1		
SCR - B3F- cell Mass		

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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 Accident D2		
SCR - B3F- cell Mass Accident E2		
SCR - B3F- cell Mass Accident F2		
SCR - B3F- cell Mass		

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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 Accident G3		
SCR - B3F- cell Mass Accident H3		
SCR - B3F- cell Mass Accident I3		
SCR - B3F- cell Mass		

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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 Accident J20		
SCR - B3F- cell Mass Accident K20		
SCR - B3F- cell Mass Accident L20		
SCR - B3F- cell Mass		

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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 Concentration Accident B2		
SCR - B3F- cell Concentration Accident C2		
SCR - B3F- cell Concentration Accident D2		
SCR - B3F- cell		

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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 Concentration Accident I3		
SCR - B3F- cell Concentration Accident A20		
SCR - B3F- cell Concentration Accident B20		
SCR - B3F- cell		

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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 E1		
SCR - B3F- cell Pandemic F1		
SCR - B3F- cell Pandemic A2		
SCR - B3F- cell Pandemic		

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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 C20		
SCR - B3F- cell Pandemic D20		
SCR - B3F- cell Pandemic E20		
SCR - B3F- cell Pandemic		

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F20		
SCR - B3F- cell Pandemic F21		
SCR - B3F- cell Pandemic D22		
SCR - B3F- cell Pandemic G22		
SCR - B3G - General		
SCR - B3G - Purpose		
SCR - B3G - Benefits		
SCR - B3G - Costs		
SCR - B3G - Groups		
SCR - B3G - Materiality		
SCR - B3G - Disclosure		
SCR - B3G - Frequency		
SCR - B3G- cell A1		
SCR - B3G- cell A2		
SCR - B3G- cell A3		
SCR - B3G- cell A4		
SCR - B3G- cell A5		
SCR - B3G- cell A6		
SCR - B3G- cell A7		
SCR - B3G- cell A8		
SCR - B3G- cell A9		
SCR - B3G- cell A10		

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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		
MCR - B4A & B4B – Purpose		
MCR - B4A & B4B – Benefits		
MCR - B4A & B4B – Costs		
MCR - B4A & B4B – Groups		
MCR - B4A & B4B – Materiality		
MCR - B4A & B4B - Disclosure		
MCR - B4A & B4B – Frequency		
MCR - B4A- cell A1		
MCR - B4A- cell B2		
MCR - B4A- cell C2		
MCR - B4A- cell B3		
MCR - B4A- cell C3		
MCR - B4A- cell B4		
MCR - B4A- cell C4		
MCR - B4A- cell B5		

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MCR - B4A- cell C5		
MCR - B4A- cell B6		
MCR - B4A- cell C6		
MCR - B4A- cell B7		
MCR - B4A- cell C7		
MCR - B4A- cell B8		
MCR - B4A- cell C8		
MCR - B4A- cell B9		
MCR - B4A- cell C9		
MCR - B4A- cell B10		
MCR - B4A- cell C10		
MCR - B4A- cell B11		
MCR - B4A- cell C11		
MCR - B4A- cell B12		
MCR - B4A- cell C12		
MCR - B4A- cell B13		
MCR - B4A- cell C13		
MCR - B4A- cell B14		
MCR - B4A- cell C14		
MCR - B4A- cell B15		
MCR - B4A- cell C15		
MCR - B4A- cell B16		
MCR - B4A- cell C16		
MCR - B4A- cell B17		
MCR - B4A- cell C17		
MCR - B4A- cell A18		

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MCR - B4A- cell B19		
MCR - B4A- cell B20		
MCR - B4A- cell B21		
MCR - B4A- cell B22		
MCR - B4A- cell C23		
MCR - B4A- cell A24		
MCR - B4A- cell A25		
MCR - B4A- cell A26		
MCR - B4A- cell A27		
MCR - B4A- cell A28		
MCR - B4A- cell A29		
MCR - B4A- cell A30		
MCR - 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		

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MCR - B4B- cell G4		
MCR - B4B- cell D5		
MCR - B4B- cell E5		
MCR - B4B- cell F5		
MCR - B4B- cell G5		
MCR - B4B- cell D6		
MCR - B4B- cell E6		
MCR - B4B- cell F6		
MCR - B4B- cell G6		
MCR - B4B- cell D7		
MCR - B4B- cell E7		
MCR - B4B- cell F7		
MCR - B4B- cell G7		
MCR - B4B- cell D8		
MCR - B4B- cell E8		
MCR - B4B- cell F8		
MCR - B4B- cell G8		
MCR - B4B- cell D9		
MCR - B4B- cell E9		
MCR - B4B- cell F9		
MCR - B4B- cell G9		
MCR - B4B- cell D10		
MCR - B4B- cell E10		
MCR - B4B- cell F10		
MCR - B4B- cell G10		
MCR - B4B- cell D11		

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MCR - B4B- cell E11		
MCR - B4B- cell F11		
MCR - B4B- cell G11		
MCR - B4B- cell D12		
MCR - B4B- cell E12		
MCR - B4B- cell F12		
MCR - B4B- cell G12		
MCR - B4B- cell D13		
MCR - B4B- cell E13		
MCR - B4B- cell F13		
MCR - B4B- cell G13		
MCR - B4B- cell D14		
MCR - B4B- cell E14		
MCR - B4B- cell F14		
MCR - B4B- cell G14		
MCR - B4B- cell D15		
MCR - B4B- cell E15		
MCR - B4B- cell F15		
MCR - B4B- cell G15		
MCR - B4B- cell D16		
MCR - B4B- cell E16		
MCR - B4B- cell F16		
MCR - B4B- cell G16		
MCR - B4B- cell D17		
MCR - B4B- cell E17		
MCR - B4B- cell F17		

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MCR - B4B- cell G17		
MCR - B4B- cell B18		
MCR - B4B- cell C18		
MCR - B4B- cell D19		
MCR - B4B- cell F19		
MCR - B4B- cell D20		
MCR - B4B- cell F20		
MCR - B4B- cell D21		
MCR - B4B- cell F21		
MCR - B4B- cell D22		
MCR - B4B- cell F22		
MCR - B4B- cell E23		
MCR - B4B- cell G23		
MCR - B4B- cell A24		
MCR - B4B- cell A25		
MCR - B4B- cell A26		
MCR - B4B- cell A27		
MCR - B4B- cell A28		
MCR - B4B- cell A29		
MCR - B4B- cell A30		
MCR - B4B- cell A31		
MCR - B4B- cell B32		
MCR - B4B- cell C32		
MCR - B4B- cell B33		
MCR - B4B- cell C33		
MCR - B4B- cell B34		

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MCR - B4B- cell C34		
MCR - B4B- cell B35		
MCR - B4B- cell C35		
MCR - B4B- cell B36		
MCR - B4B- cell C36		
MCR - B4B- cell B37		
MCR - B4B- cell C37		
MCR - B4B- cell B38		
MCR - B4B- cell C38		
MCR - B4B- cell B39		
MCR - B4B- cell C39		
Assets - D1- General	<p>The asset reporting requirements are noncritical. Most data is available in existing data bases and can be reported using a regular process. For some requirements more explanatory notes are required.</p> <p>We do not agree with the need for a security-by-security listing for UL funds as the investment risk is not retained by the undertaking. Asset categories, in line with that required for form D4, should provide adequate information. In relation to the requirements as given, it would be helpful to clarify the requirement for unit-linked funds in the D1 template. The comments in the LOG document state that "...a given security that is part of the investments of life and non-life business and / or several funds (e.g. several U-L) will result in 1 line for life, 1 life for non-life and as many lines as the funds where the security is present." This would suggest that a security-by-security listing is required in template D1 for each UL fund. However the LOG document states that "Investment funds are included here however a detailed look-through approach is assessed in Assets – D4", which seems to suggest that the detail is left until template D4. Form D4 is described as "...a look-through perspective on CIS / UCITS". It would therefore be helpful to clarify what goes into template D1 for unit-linked funds and if any distinction is intended between 'U-L', 'CIS/UCITS' and 'Investment funds'.</p>	

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Assets - D1- Purpose		
Assets - D1- Benefits		
Assets - D1- Costs		
Assets - D1- Groups		
Assets - D1- Materiality		
Assets - D1- Disclosure		
Assets - D1- Frequency		
Assets - D1 - Quarterly Exemption		
Assets - D1- cell A1		
Assets - D1- cell A2		
Assets - D1- cell A3		
Assets - D1- cell A4		
Assets - D1- cell A5		
Assets - D1- cell A6		
Assets - D1- cell A7		
Assets - D1- cell A8		
Assets - D1- cell A9		
Assets - D1- cell A10		
Assets - D1- cell A11		
Assets - D1- cell A12		
Assets - D1- cell A13		
Assets - D1- cell A15		
Assets - D1- cell A16		

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Assets - D1- cell A17		
Assets - D1- cell A18		
Assets - D1- cell A19		
Assets - D1- cell A20		
Assets - D1- cell A22		
Assets - D1- cell A23		
Assets - D1- cell A24		
Assets - D1- cell A25		
Assets - D1- cell A26		
Assets - D1- cell A28		
Assets - D1- cell A30		
Assets - D1Q- General		
Assets - D1Q- Purpose		
Assets - D1Q- Benefits		
Assets - D1Q- Costs		
Assets - D1Q- Groups		
Assets - D1Q- Materiality		
Assets - D1Q- Disclosure		
Assets - D1Q- Frequency		
Assets - D1Q- cell A1 (list)		
Assets - D1Q- cell A2 (list)		
Assets - D1Q- cell A3 (list)		
Assets - D1Q- cell A4 (list)		
Assets - D1Q- cell A5 (list)		

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Assets - D1Q- cell A6 (list)		
Assets - D1Q- cell A7 (list)		
Assets - D1Q- cell A8 (list)		
Assets - D1Q- cell A9 (list)		
Assets - D1Q- cell A10 (list)		
Assets - D1Q- cell A12 (list)		
Assets - D1Q- cell A13 (list)		
Assets - D1Q- cell A14 (list)		
Assets - D1Q- cell A15 (list)		
Assets - D1Q- cell A16 (list)		
Assets - D1Q- cell A17 (list)		
Assets - D1Q- cell A18 (list)		
Assets - D1Q- cell A20 (list)		
Assets - D1Q- cell A22 (list)		
Assets - D1Q- cell A24 (list)		
Assets - D1Q- cell A25 (list)		
Assets - D1Q- cell A28 (list)		
Assets - D1Q- cell A30 (list)		
Assets - D1Q- cell A3		
Assets - D1Q- cell A5		
Assets - D1Q- cell A6		
Assets - D1Q- cell A7		
Assets - D1Q- cell A7A		
Assets - D1Q- cell A8		
Assets - D1Q- cell A8A		
Assets - D1Q- cell A8C		

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Assets - D1Q- cell A8D		
Assets - D1Q- cell A9A		
Assets - D1Q- cell A9B		
Assets - D1Q- cell A9C		
Assets - D1Q- cell A9D		
Assets - D1Q- cell A9E		
Assets - D1Q- cell A9F		
Assets - D1Q- cell A10A		
Assets - D1Q- cell A10B		
Assets - D1Q- cell A14		
Assets - D1Q- cell A11		
Assets - D1Q- cell A12		
Assets - D1Q- cell A13		
Assets - D1Q- cell A27		
Assets - D1Q- cell L16		
Assets - D1S- General		
Assets - D1S- Purpose		
Assets - D1S- Benefits		
Assets - D1S- Costs		
Assets - D1S- Groups		
Assets - D1S- Materiality		
Assets - D1S- Disclosure		
Assets - D1S- Frequency		
Assets - D1S- cell A1		

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Assets - D1S- cell A2		
Assets - D1S- cell A3		
Assets - D1S- cell A4		
Assets - D1S- cell A5		
Assets - D1S- cell A6		
Assets - D1S- cell A7		
Assets - D1S- cell A8		
Assets - D1S- cell A9		
Assets - D1S- cell A10		
Assets - D1S- cell A12		
Assets - D1S- cell A13		
Assets - D1S- cell A14		
Assets - D1S- cell A15		
Assets – D20- General		
Assets – D20- Purpose		
Assets – D20- Benefits		
Assets – D20- Costs		
Assets – D20- Groups		
Assets – D20- Materiality		
Assets – D20- Disclosure		
Assets – D20- Frequency		
Assets – D20 – Quarterly Exemption		
Assets - D20- cell A1		

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Assets - D20- cell A2		
Assets - D20- cell A3		
Assets - D20- cell A4		
Assets - D20- cell A5		
Assets - D20- cell A6		
Assets - D20- cell A7		
Assets - D20- cell A8		
Assets - D20- cell A9		
Assets - D20- cell A10		
Assets - D20- cell A11		
Assets - D20- cell A13		
Assets - D20- cell A14		
Assets - D20- cell A15		
Assets - D20- cell A16		
Assets - D20- cell A17		
Assets - D20- cell A19		
Assets - D20- cell A20		
Assets - D20- cell A21		
Assets - D20- cell A22		
Assets - D20- cell A23		
Assets - D20- cell A24		
Assets - D20- cell A25		
Assets - D20- cell A26		
Assets - D20- cell A27		
Assets - D20- cell A28		
Assets - D20- cell A29		

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Assets - D20- cell A31		
Assets - D20- cell A32		
Assets - D20- cell A33		
Assets - D20- cell A34		
Assets - D20- cell A35		
Assets - D2T- General		
Assets - D2T- Purpose		
Assets - D2T- Benefits		
Assets - D2T- Costs		
Assets - D2T- Groups		
Assets - D2T- Materiality		
Assets - D2T- Disclosure		
Assets - D2T- Frequency		
Assets - D2T- Quarterly Exemption		
Assets - D2T- cell A1		
Assets - D2T- cell A2		
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		

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Assets - D2T- cell A10		
Assets - D2T- cell A11		
Assets - D2T- cell A13		
Assets - D2T- cell A14		
Assets - D2T- cell A15		
Assets - D2T- cell A16		
Assets - D2T- cell A17		
Assets - D2T- cell A18		
Assets - D2T- cell A19		
Assets - D2T- cell A20		
Assets - D2T- cell A21		
Assets - D2T- cell A22		
Assets - D2T- cell A23		
Assets - D2T- cell A24		
Assets - D2T- cell A25		
Assets - D2T- cell A26		
Assets - D2T- cell A27		
Assets - D2T- cell A28		
Assets - D2T- cell A30		
Assets - D2T- cell A31		
Assets - D2T- cell A32		
Assets - D2T- cell A34		
Assets - D2T- cell A35		
Assets – D3- General		
Assets – D3- Purpose		

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Assets – D3- Benefits		
Assets – D3- Costs		
Assets – D3- Groups		
Assets – D3- Materiality		
Assets – D3- Disclosure		
Assets – D3- Frequency		
Assets - D3- cell A1		
Assets - D3- cell A3		
Assets - D3- cell A4		
Assets - D3- cell A6		
Assets - D3- cell A7		
Assets - D3- cell A8		
Assets - D3- cell A15		
Assets – D4- General		
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		

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Assets - D4- cell A1		
Assets - D4- cell A2		
Assets - D4- cell A3		
Assets - D4- cell A4		
Assets - D4- cell A5		
Assets - D4- cell A6		
Assets - D4- cell A7		
Assets - D4- cell A8	Will Level 3 guidance indicate what level of look through is acceptable? Could companies classify all funds as « other equity » if there is poor availability of data?	
Assets – D5- General		
Assets – D5- Purpose		
Assets – D5- Benefits		
Assets – D5- Costs		
Assets – D5- Groups		
Assets – D5- Materiality		
Assets – D5- Disclosure		
Assets – D5- Frequency		
Assets - D5- cell A1		
Assets - D5- cell A2		
Assets - D5- cell A3		
Assets - D5- cell A4		
Assets - D5- cell A5		
Assets - D5- cell A6		
Assets - D5- cell A7		

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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		
Assets - D6- General		
Assets - D6- Purpose		
Assets - D6- Benefits		
Assets - D6- Costs		
Assets - D6- Groups		
Assets - D6- Materiality		
Assets - D6- Disclosure		
Assets - D6- Frequency		
Assets - D6- cell A2		
Assets - D6- cell A3		
Assets - D6- cell A4		
Assets - D6- cell A5		
Assets - D6- cell A6		
Assets - D6- cell A7		
Assets - D6- cell A8		
Assets - D6- cell A9		
Assets - D6- cell A10		

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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>The reporting requirements seem still too comprehensive and too granular. Especially the information at product level in TP-F3 is very burdensome for the undertaking. Furthermore it is questionable if the supervisory will get profound findings from what seems more like a data pool. The proportion between effort for the undertaking and benefit for the supervisory seems not to be appropriate.</p> <p>The LOG document refers to Article 88 for information on approximations? Article 88 is on Own Funds.</p>	
TP - F1 & F1Q - Purpose		
TP - F1 & F1Q - Benefits		
TP - F1 & F1Q - Costs		
TP - F1 & F1Q - Groups		
TP - F1 & F1Q - Materiality		
TP - F1 & F1Q - Disclosure		
TP - F1 & F1Q - Frequency		
TP - F1- cells A1 - A14		

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TP - F1- cell A7A		
TP - F1- cell A7B		
TP - F1- cell A7C		
TP - F1- cells B1 - B14		
TP - F1- cells B2 - C2		
TP - F1- cells B4-C1		
TP - F1- cells BA1 - BA13		
TP - F1- cell BB1		
TP - F1- cell BB10		
TP - F1- cell BB13		
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	A definition of products with a surrender option should be provided. E.g. for term assurance a policyholder could surrender but no surrender payment would be made. Does this product have a surrender option? If a surrender value is required does it just have to be greater than zero?	

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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	It is not clear what should be included here. Surrender claim payments in the reporting period (as per LOG definition for cell)? Or the amount that would be paid out if all policies surrendered (as per general comment in LOG under purpose)? Or something else? Is this duplication of cell A26 in template F3?	
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		
TP – F2- Purpose		
TP – F2- Benefits		
TP – F2- Costs		
TP – F2- Groups		

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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		
TP -F2- cells U1 – U35		
TP -F2- cells CH1 –CH35		

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TP -F2- cells DH1 –DH35		
TP -F2- cells FH1 –FH35		
TP -F2- cells V1 –V35		
TP -F2- cells X1 – X35		
TP -F2- cells Y1-Y35		
TP -F2- cells Z1- Z35		
TP -F2- cells GH1 –GH35		
TP – F3- General		
TP – F3- Purpose		
TP – F3- Benefits		
TP – F3- Costs		
TP – F3- Groups		
TP – F3- Materiality		
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	EIOPA has asked if a closed list should be provided for type of product. Any list provided should be a sub-division of the Lines of Business used for the TP templates. We note that classes of business (as per Annex II and V of the Directive) are used to sub-divide the template Country-K1. This requires a different sub-division of business than the Line of	

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	Business split for the TP templates (and the Cover-A1 template).	
TP - F3- cell A6		
TP - F3- cell A7		
TP - F3- cell A8		
TP - F3- cell A9		
TP - F3- cell A10		
TP - F3- cell A15		
TP - F3- cell A21		
TP - F3- cell A24		
TP - F3- cell A26		
TP - F3- cell A30		
TP - F3- cell A34A	Purpose of this cell (as per LOG document) refers to cell A20 which no longer exists?	
TP - F3- cell A41		
TP – F3A- General	It would be helpful to give a definition of variable annuities so that undertakings are clear when this template should be used.	
TP – F3A- Purpose		
TP – F3A- Benefits		
TP – F3A- Costs		
TP – F3A- Groups		
TP – F3A- Materiality		
TP – F3A- Disclosure		
TP – F3A- Frequency		

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TP - F3A- cell A1		
TP - F3A- cell A2		
TP - F3A- cell A3		
TP - F3A- cell A4		
TP - F3A- cell A5		
TP - F3A- cell A6		
TP - F3A- cell A7		
TP - F3A- cell A8		
TP - F3A- cell A9		
TP - F3A- cell A10		
TP - F3A- cell A11		
TP - F3A- cell A12		
TP - F3A- cell A13		
TP - F3A- cell A14		
TP - F3A- cell A15	LOG document refers to TP(NL)-E5 which doesn't exist.	
TP - F3A- cell A16		
TP - F3B- cell A1		
TP - F3B- cell A2		
TP - F3B- cell A3		
TP - F3B- cell A4		
TP - F3B- cell A5		
TP - F3B- cell A6		
TP - F3B- cell A7		
TP - F3B- cell A8		
TP - F3B- cell A9		

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TP - F3B- cell A10		
TP – F4- General	Talk of technical rates on these annuities, this might not exist as in some countries often taking on an obligation to pay a stream of payments	
TP – F4- Purpose		
TP – F4- Benefits		
TP – F4- Costs		
TP – F4- Groups		
TP – F4- Materiality		
TP – F4- Disclosure		
TP – F4- Frequency		
TP - F4- cell A0		
TP - F4- cell A1		
TP - F4- cell A2		
TP - F4- cell A3		
TP - F4- cell A4		
TP - F4- cell A5		
TP - F4- cell B1		
TP - F4- cell C1		
TP - F4- cell D1		
TP - F4- cell A6		
TP – E1 & E1Q- General	Row 68 use of terms simplified or non-simplified methods – how do you define one method to be simplified or not? As per GC previous comments we do not believe this is an appropriate term given there is a range of methods and it is not ‘black and white’	
TP – E1 & E1Q - Purpose		

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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	The differentiation in different types of recoverables in line 17 - 19 is not helpfully. An insurer can only give an assumption of the profit margin of the requested reinsurance type. Therefor line 16 should be sufficiently.	
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	The differentiation in different types of recoverables forces the undertakings to make different models for each item. Normaly the reinsurance program should be regarded as a complete cover with different components. This induce a more general approach of recoverable modeling. . Therefor line 27 should be sufficiently.	
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	The level of detail required is beyond what is necessary to fulfil the stated purpose and details are not necessarily directly available from the underlying model which is supposed to be reported.	

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	Detailed breakdown of claims provisions, but not of premium provisions. Unclear to us why more is not required on the premium side, as premium is more relevant given profitability – potentially the level of reporting details could be reduced for the claims provisions. Similar comments applies to E1 in the detailed split	
TP – E2- Purpose		
TP – E2- Benefits	For the stated benefit a more summarized approach would be sufficient. A breakdown into gross and recoverables, cash in- and outflow and separately for benefits and expenses or premium and other does not seem to add additional value and is potentially not directly available from capital models.	
TP – E2- Costs	Costs are reasonable as long as the report is limited to aggregate information. The break-down into inflow and outflow might require additional efforts when not prepared in such a detail for the capital calculation. This would be onerous and misleading e.g. when ex-post re-allocation were to be employed to provide details beyond capital calculation.	
TP – E2- Groups		
TP – E2- Materiality		
TP – E2- Disclosure		
TP – E2- Frequency		
TP - E2- cells A1-A31		
TP - E2- cells B1-B31		
TP - E2- cells C1-C31		
TP - E2- cells D1-D31		
TP - E2- cells E1-E31		
TP - E2- cells F1-F31		
TP – E3- General	It is not clear how this template will help to serve its stated purpose. The historical loss development triangles are key inputs for actuarial reserving methods but do not provide meaningful information just by themselves. The construction of the template suggests that by collecting the historical data plus a statement of the methodology	

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	<p>used (A01) and a tail factor (A02) that estimates could be reproduced. This is typically not possible as the process of establishing the expected value of unpaid claims is more complex, sometimes iterative and necessarily requires also qualitative understanding of the underlying business as well as actuarial judgment to be applied. This is also why reserving is a core element for the actuarial function. It would not be appropriate for the regulators to rebuild this process based on this data or to replace it by something of rather mechanical nature.</p> <p>The history of undiscounted best estimate provisions seems more appropriate and sufficient to track developments.</p> <p>It is required to report on either accident or underwriting year basis but it does not seem to be possible to state what is applicable in a given report for a specific line of business.</p>	
TP – E3- Purpose	The salvage&subrogation split is to our understanding unnecessary but extremely tedious – we suggest not requiring this split.	
TP – E3- Benefits	We do not believe that it is possible to assess the sufficiency of claims provisioning by collecting detailed and granular historical data as a more complex valuation process and additional non-quantitative information would be necessary at least in most relevant situations.	
TP – E3- Costs	The costs are limited as long as the claims provisions are established on the same level of detail as required by the template, which is not always the case for good reasons (e.g. no separate projection for salvage & subrogation and/or reinsurance recoveries due to low materiality, lack of credibility, beyond proportionality, limited data availability etc.).	
TP – E3- Groups		
TP – E3- Materiality		
TP – E3- Disclosure		
TP – E3- Frequency		
TP - E3- cells A00		

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TP - E3- cells A01	There is no pre-defined exhaustive list of methodologies and in practice a blend of different methods can be applied to different portions of the claims (e.g. Bornhuetter-Ferguson on incurred data for the latest two years, chain-ladder on paid data for all previous years until year 10 and weighted average of chain-ladder and a frequency-severity-method for all other). It is not meaningfully possible to report this via a template.	
TP - E3- cells A02	The tail factor is only a meaningful information when being part of a reserving methodology, rf. to statement about cell A01 and difficulties arising from it.	
TP - E3- cells A03: N		
TP - E3- cells A04		
TP - E3- cells A1-A15-J0	Not clear what can be seen from this data itself.	
TP - E3- cells A17-A31-J16	Burdensome level of detail and out of proportion in all situations establishing claims provisions net of S&S, which is not untypical and often sufficient.	
TP - E3- cells A33-A47-J32	Depending on how gross to net provisions are calculated, this information might not be available or not meaningful given the business background (e.g. change in reinsurance program).	
TP - E3- cells P1-P15-J0	Not clear what is required for J0. The switch from an undiscounted to a discounted view in the year-end column is surprising and purpose is not clear. Instead of best estimate claims provisions a best estimate ultimate loss might be more insightful.	
TP - E3- cells P33-P47-J32	Depending on how gross to net provisions are calculated, this information might not be available or not meaningful given the business background (e.g. change in reinsurance program).	
TP - E3- cells AE1-AE15-J0	Not clear what can be seen from this data itself.	
TP - E3- cells AE17-AE31-J0	Burdensome level of detail and out of proportion in all situations establishing claims provisions net of S&S, which is not untypical and often sufficient.	
TP - E3- cells AE33-AE47-J0	Depending on how gross to net provisions are calculated, this information might not be available or not meaningful given the business background (e.g. change in reinsurance program).	
TP - E3- cells IH1-IE15B	We cannot find these numbers in the template but guess that it refers to the section "Additional Information: Inflation Rates". It is not clear what actually is required here as the definitions and instructions in the LOG are too vague. It is also not clear how	

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	this information – whatever the exact definition might be – would provide by any means sufficient background on the reserving methodology employed and how they would serve the purpose of this template.	
TP – E4- General	<p>It is not clear how this template would serve the desired benefits. The distinction into open claims at the beginning of the period and claims incurred during the year as well as for being open or closed at the end of the period might be a good starting point for a claims handling monitoring, but it is not directly related to the way how claims provisions are established by employing the actuarial function and applying related estimation techniques.</p> <p>Overall we consider this an onerous request with no clear benefit.</p>	
TP – E4- Purpose	Not clear how the stated purpose would assist the regulators in assessing the technical provisions.	
TP – E4- Benefits	<p>From the template it might be possible to draw to some of the stated ratios and averages, but they would be isolated bits and pieces of information and not related to the technical provisions in an obvious way. Some of the desired information might be better placed in an actuarial report discussing how observations on e.g. claim settlement have been considered in estimating claims provisions. Also other descriptive statistical information as claims completion triangles might be more insightful for the purpose (but also better left to an actuarial review and report instead to a quantitative reporting template).</p> <p>The variation analysis required in template VA – C2C seems to be a better concept and might make TP – E4 dispensable.</p>	
TP – E4- Costs	<p>The costs would be in most cases extraordinary large. First, the data might be not at hand as it is not necessary in the calculation – neither for the claims reserving itself, nor for the risk capital calculation. Generally the QRT should only collect information which is already used for the calculation.</p> <p>Also the template mixes information from different sources like general ledger and claims handling, which is technically difficult and costly to establish.</p>	
TP – E4- Groups		

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TP - E4- Materiality		
TP - E4- Disclosure		
TP - E4- Frequency		
TP - E4- cells A1-A10		
TP - E4- cells B1-B10		
TP - E4- cells C1-C10		
TP - E4- cells D1-D10		
TP - E4- cells E1-E10		
TP - E4- cells F1-F10		
TP - E4- cells G1-G10		
TP - E4- cells H1-H10		
TP - E4- cells I1-I10		
TP - E4- cells J1-J10		
TP - E4- cells K1-K10		
TP - E4- cells L1-L10		
TP - E4- cells M1-M11		
TP - E4- cells N1-N11		
TP - E4- cells O1-O11		
TP - E4- cells P1-P10		
TP - E4- cells Q1-Q10		
TP - E4- cells R1-R10		
TP - E4- cells S1-S10		
TP - E4- cells T1-T10		
TP - E6- General	Require claims incurred reporting in order to do this companies need to have case-by-case reserving, if this does not exist companies will need to allocate the reserve making the schedule slight 'artificial'	

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	It would be helpful to have a header of the lines and an exact description of the cells' contents. Ist there consistency to the data in E4?	
TP – E6- Purpose	The purpose to discover changes in the structure of the claims will be met much better if there were with both total payments and RBNS-reserves	
TP – E6- Benefits		
TP – E6- Costs		
TP – E6- Groups		
TP – E6- Materiality		
TP – E6- Disclosure		
TP – E6- Frequency		
TP – E6- cells A1-A20	Please mark the cells as in E4!	
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	The net retention should be expressed in a consistent way i.e. everything from column K onwards should be based on the underwriting year model	

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	The template is only well defined in Property Insurance where there are well defined sums insured. How is the risk defined e.g. in third party insurance?	
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		
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	It would be helpful to have a header of the lines and an exact description of the cells' contents. Do we have to fill in values in cells below A1, B1 etc? Please mark the cells to be filled in!	

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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		
TP - E7B- cell C1		
TP - E7B- cell D1		
TP - E7B- cell E1		
Re - J1- General		
Re - J1- Purpose		
Re - J1- Benefits		
Re - J1- Costs		
Re - J1- Groups		
Re - J1- Materiality		
Re - J1- Disclosure		
Re - J1- Frequency		

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Re - J1- cell A00		
Re - J1- cell A1		
Re - J1- cell B1		
Re - J1- cell C1		
Re - J1- cell D1		
Re - J1- cell E1		
Re - J1- cell F1		
Re - J1- cell G1		
Re - J1- cell H1		
Re - J1- cell I1		
Re - J1- cell J1		
Re - J1- cell K1		
Re - J1- cell L1		
Re - J1- cell M1		
Re - J1- cell N1		
Re - J1- cell P1		
Re - J1- cell Q1		
Re - J1- cell W1		
Re - J1- cell Y1		
Re - J1- cell Z1		
Re - J1- cell AB1		
Re - J1- cell AC1		
Re - J1- cell A01		
Re - J1- cell A11		
Re - J1- cell B11		
Re - J1- cell C11		

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Re - J1- cell D11		
Re - J1- cell E11		
Re - J1- cell F11		
Re - J1- cell G11		
Re - J1- cell H11		
Re - J1- cell I11		
Re - J1- cell J11		
Re - J1- cell K11		
Re - J1- cell L11		
Re - J1- cell M11		
Re - J1- cell O11		
Re - J1- cell U11		
Re - J1- cell W11		
Re - J1- cell X11		
Re - J1- cell Z11		
Re - J1- cell AA11		
Re - J2- General		
Re - J2- Purpose		
Re - J2- Benefits		
Re - J2- Costs		
Re - J2- Groups		
Re - J2- Materiality		
Re - J2- Disclosure		
Re - J2- Frequency		

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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	This is described as "the amount of premium paid for 100% of the treaty" and "the equivalent of the reinsurance premium for 100%." Clarification needed on the meaning here and the interaction with cell number AQ1.	
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		
Re - J2- cell AM1		
Re - J2- cell AO1		
Re - J2- cell AP1		
Re - J2- cell AQ1		
Re - J3- General		
Re - J3- Purpose		
Re - J3- Benefits		
Re - J3- Costs		
Re - J3- Groups		
Re - J3- Materiality		
Re - J3- Disclosure		
Re - J3- Frequency		
Re - J3- cell A1		
Re - J3- cell B1		

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

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SPV- cell B1A		
SPV- cell C1		
SPV- cell D1		
SPV- cell E1		
SPV- cell F1		
SPV- cell F1A		
SPV- cell G1		
SPV- cell H1		
SPV- cell I1		
SPV- cell J1		
SPV- cell K1		
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		

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G01-Benefits		
G01-Costs	This states that an extensive discussion will occur between the group and supervisors during the first year of implementation to fill this template. However companies would benefit from having this scope defined earlier so that they can plan their reporting accordingly.	
G01-Application		
G01-Materiality		
G01-Disclosure		
G01-Frequency		
G01- cell A1		
G01- cell B1		
G01- cell C1		
G01- cell D1		
G01- cell E1		
G01- cell F1		
G01- cell G1		
G01- cell H1	This should be clarified. For (re)insurance undertakings does "total amount of Solvency II balance sheet" mean cell A30 on BS-C1. If so this should be stated.	
G01- cell I1		
G01- cell J1	This cell and K1 and L1 should be clarified. Should "performance" also be on a Solvency II basis (as for balance sheet)?	
G01- cell K1		
G01- cell L1		
G01- cell M1		
G01- cell N1		

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G01- cell O1		
G01- cell P1		
G01- cell Q1		
G01- cell R1		
G01- cell S1		
G01- cell T1		
G01- cell U1		
G01- cell V1		
G03 & G04-Purpose		
G03 & G04-Benefits		
G03 & G04-Costs		
G03 & G04-Application		
G03 & G04-Materiality		
G03 & G04-Disclosure		
G03 & G04-Frequency		
G03- cell A1		
G03- cell B1		
G03- cell C1		
G03- cell D1		
G03- cell E1		
G03- cell F1		
G03- cell G1		
G03- cell H1		
G03- cell I1		
G03- cell J1		
G03- cell K1		

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G03- cell L1		
G03- cell M1		
G03- cell N1		
G03- cell O1		
G03- cell P1		
G04- cell A1		
G04- cell A2		
G04- cell B1		
G04- cell C1		
G04- cell D1		
G04- cell E1		
G14-Purpose		
G14-Benefits		
G14-Costs		
G14-Application		
G14-Materiality		
G14-Disclosure		
G14-Frequency		
G14- cell A1		
G14- cell B1		
G14- cell C1		
G14- cell D1		
G14- cell E1		
G14- cell F1		
G14- cell G1		
G14- cell H1		

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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		
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		

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

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IGT2- cell C6		
IGT2- cell D6		
IGT2- cell E6		
IGT2- cell F6		
IGT2- cell G6		
IGT2- cell H6		
IGT2- cell I6		
IGT2- cell J6		
IGT2- cell K6		
IGT2- cell L6		
IGT2- cell M6		
IGT2- cell N6		
IGT2- cell O6		
IGT2- cell P6		
IGT2- cell Q6		
IGT2- cell R6		
IGT2- cell S6		
IGT2- cell T6		
IGT2- cell U6		
IGT2- cell V6		
IGT2- cell W6		
IGT3- cell B6		
IGT3- cell C6		
IGT3- cell D6		
IGT3- cell D6		
IGT3- cell E6		

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IGT3- cell F6		
IGT3- cell G6		
IGT3- cell H6		
IGT3- cell I6		
IGT3- cell J6		
IGT3- cell K6		
IGT3- cell L6		
IGT3- cell M6		
IGT3- cell N6		
IGT3- cell O6		
IGT4- cell B5		
IGT4- cell C5		
IGT4- cell D5		
IGT4- cell E5		
IGT4- cell F5		
IGT4- cell G5		
IGT4- cell H5		
IGT4- cell I5		
IGT4- cell J5		
IGT4- cell K5		
IGT4- cell L5		
IGT4- cell M5		
IGT4- cell N5		
IGT4- cell O5		
IGT4- cell P5		
RC-Purpose	An example might help illustrate what is meant by "the most important exposure by	

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	counterparty“. For example if group undertakings hold several bonds and deposits with a single bank, do they just include the bond or deposit with the largest value here? Could concentration information be provided in a template such as the helper template for QIS5 for market concentration risk? Combined with the reinsurance templates?	
RC-Benefits		
RC-Costs		
RC-Application		
RC-Materiality		
RC-Disclosure		
RC-Frequency		
RC- cell A2		
RC- cell A3		
RC- cell A4		
RC- cell A5		
RC- cell A6		
RC- cell A7		
RC- cell A8		
RC- cell A9		
RC- cell A10		
RC- cell A11		
RC- cell A12		
RC- cell A13		
RC- cell A14		
RC- cell A15	The explanation of net maximum exposure versus gross maximum exposure is not clear. This would benefit from further explanation.	

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RC- cell A16		
RC- cell A17		
RC- cell A18		