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2	**Comments Template on** **Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities**		**Deadline** **19. Jun 13** **12:00 CET**
3			
4			
5	Name of Company:	**CFO Forum and CRO Forum**	
6	Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Confidential/Public (please delete the not applicable)
7	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 - Please do not insert or delete any row. If you have no comment on a paragraph or a cell, keep the row empty. - Leave the last column empty. - Please fill in your comment in the relevant row. - Our IT tool does not allow processing of comments which do not refer to the specific numbers below. o Certain rows represent a group of cells with similar information (ex : TP-E1- cells A43-L43) o If your comment refers to multiple cells or paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other cells or paragraphs this also applies. o If your comment refers to subparagraphs or specific cells within a group, please indicate this in the comment itself. Please send the completed template, in Word Format, to CP-13-010@eiopa.europa.eu. Our IT tool does not allow processing of any other formats. The numbering of the paragraphs refers to this Consultation Paper, the numbering of cells refers to the Technical Annexes II and III.		
8	**Reference**	**Comment**	**Update for**
9	**General Comments**	We do not support additional Solvency 2 reporting on an interim basis in advance of Solvency 2 entering into force. In our view, it is an unwelcome burden for firms to report under the new regime while Solvency I would still be used as the basis for regulatory supervision. This would be particularly problematic for companies seeking internal model approval and would already be required to run their internal model in parallel with the standard formula as part of the approval process. It would effectively mean having to adhere to three solvency reporting regimes at one time. We believe that assessing implementation plans would be a more effective way for National Competent Authorities (NCAs) to determine a firm's level of preparedness for Solvency 2 reporting requirements. Introducing a sub-set of narrative and quantitative reporting templates (QRTs) during an interim period risks detracting attention from implementation of the package as a whole. Without prejudice to our overall position as outlined above, we would like to raise the following key points to supplement our detailed comments. 1. Interim measures exist solely to enable NCA's to assess preparedness and should not result in any supervisory action; this should be explicitly dealt with in a guideline rather than in introductory text. EIOPA should consider an explicit guideline outlining the "intent" in which they have been issued and that it will not drive supervisory action. It is the understanding of our members that the intention of the guidelines is to enable NCA's to assess preparedness of firms to comply with Pillar 3 reporting requirements when Solvency 2 goes live. We recognise paragraph 1.10 of the introduction goes some way to deal with this issue however we believe this should be explicitly included as a guideline. 2. There should be a maximum of one cycle of annual reporting before Solvency 2 entry into force; this should be explicitly dealt with in a guideline rather than in introductory text. If the Solvency 2 effective date is 1/1/2016, annual templates would therefore be prepared for the year ending 2014 and delivered according to annual reporting deadlines during 2015. Any delay in the Solvency 2 effective date would result in a matching delay in the implementation dates for interim reporting. Text to this effect is included in EIOPA's introductory paragraph 1.11 however this is an important point which should be dealt with in the guideline itself. 3. We do not support any form of interim quarterly reporting. However, should it be required, it should be limited to a maximum of one cycle for the September 2015 quarter, with a deadline of 12 weeks. We note that paragraph 1.11 proposes there should be two cycles of quarterly reporting before Solvency 2 enters into force. During the first quarter of 2016, companies would have to prepare their financial year-end report for statutory accounting and their final reports under Solvency I (quarter 4 and annual). Adding Solvency 2 reporting to this is unduly burdensome in comparison with the objective of assessing industry preparedness. Also, we propose that EIOPA consider a longer reporting deadline than those set out in draft legal texts, we believe that 12 weeks better reflects the costs and challenges to the industry from any simultaneous reporting under the Solvency I and II regimes.	
10		4. Industry should be adequately consulted before making any changes to the QRTs from EIOPA's Solvency 2 reporting requirements issued in July 2012. Whilst we acknowledge that some of the changes may be of benefit to the Industry, it should be noted that companies were already developing their systems based on the QRTs issued in July 2012. There are implications on timing and resources in making additional changes which will reduce the 18 months which our members estimate would be the minimum period required to collect data and build the necessary reporting process and IT infrastructures. For example, EIOPA have made changes to the Assets-D1 replacing NACE codes with Global Industry Classification Standard (GICS) codes. This would impact on data sourcing and systems developments. It is the understanding of our members that EIOPA are required to perform a public consultation on the content of any proposals, on reporting this was concluded in summer 2012. Future engagement of the industry is crucial in this respect. It would also be helpful if EIOPA could publish an official 'change LOG' (comparing with the version issued in July 2012) with the final interim QRTs later this year. We also note that "Instructions" per this guidance should replace the "Definitions" per EIOPA's July 2012 "LOG". To avoid wasted expenditure in implementation, it is important that EIOPA clarify that this is in fact EIOPA's latest thinking on Pillar 3 QRTs. 5. Interim solo and group QRTs should only be requested if they will form part of the final QRT set (in form and content) and should not exceed the requirements that will be in place when Solvency 2 commences. Reporting data in a format that will not be required in the final QRTs will potentially require incurring costs that will not add value in the long run and is not in line with the intention of interim measures. Notable additional requirements not included in the final QRTs set are: a. Standard Formula Templates for Internal Model Users: Insurers should not be required to submit both internal model and standard formula templates if they are sufficiently progressed in their internal model approval process (IMAP). Building systems to capture data on both methods in the prescribed format, which must be submitted electronically, involves building reporting processes and submission templates that will not be required longer term, if the application is successful. For firms in IMAP any standard formula data should be sourced through the IMAP application process, not through the submission of QRTs, which will be subject to different timelines. To present this information multiple times in different forms would be very burdensome for companies. b. Ring-fenced funds reporting requirements should not be more than or different to the final requirements: i) requesting companies to report separately the largest ring fenced fund and separately consolidate the other ring fenced funds creates a sub-consolidation step for the latter that will not be required in the final QRTs; and ii) reporting of ring-fenced funds should not be extended to group reporting as proposed by the current consultation as it exceeds the final reporting requirements.	
11		6. All third countries should be automatically consolidated on an equivalent basis using the deduction & aggregation methodology. The guidelines allow third countries to be reported on an equivalent basis, if the group supervisor agrees that the Accounting Consolidation method is inappropriate and that the use of the Deduction and Aggregation (D&A) method is preferable. Given the expectation that has been set by the European Commission and supervisors in achieving third country equivalence, and the general uncertainty around as to when this issue will be resolved, we believe it would be more coherent for all third countries to be automatically consolidated on an equivalent basis using the D&A method. 7. EIOPA and the NCAs should acknowledge that reporting would be on a best effort basis and that (re)insurers have made some working assumptions in developing the processes to generate Solvency 2 reports. This may include granting exemptions or simplifications for the purposes of the exercise. Companies have made assumptions about the application of certain rules where formal regulatory approval would be required for example, the treatment of insurance subsidiaries where there is negligible interest, or valuation of overseas insurance undertakings at nil where there is a lack of available data. 8. Unit linked asset reporting should be excluded from the scope of detailed asset reporting. Asset template D1 for interim reporting requires information on unit linked assets. Collection of line by line asset data of unit linked business appears to be driven primarily by Pillar 3 interim reporting. We believe this aspect should be deferred until full adoption of Solvency 2 as it will be particularly burdensome for limited benefit. 9. QRTs reporting should be completed in thousands. In certain member states, the current Solvency I reports are only required to rounded to thousands and IFRS financial statements are produced in millions. We propose that the QRTs are completed in thousands rather than at the lower level of granularity currently proposed (units). 10. The requirement of reporting using XBRL should be deferred until full implementation of Solvency 2. Insurers intend to manage the process of building capability as the final stage of implementation for all the templates as opposed to just a subset. Having to perform it twice will cause undue time and resource constraints. We would like to reiterate that preparatory actions for Solvency 2 should focus on ensuring a sufficient level of preparedness on the side of industry. This does not have to be in the form of early implementation of certain requirements before Solvency 2 goes live. We would be happy to discuss further alternative ways of assessing preparedness for Solvency 2 reporting.	
12	**Introduction General Comments**		

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13	1,1		
14	1,2		
15	1,3		
16	1,4		
17	1,5		
18	1,6		
19	1,7		
20	1,8		
21	1,9		
22	1.10		
23	1,11	There should be a maximum of one cycle of reporting before Solvency II entry into force. If the Solvency II effective date is 1/1/2016, annual templates would therefore be prepared for the year ending 2014 and delivered according to annual reporting deadlines during 2015. We do not support any form of quarterly reporting. However, should it be required, it should be limited to a maximum of one cycle for the September 2015 quarter, with a deadline of 12 weeks. We note that paragraph 1.11 proposes there should be two cycles of quarterly reporting before Solvency II enters into force. During the first quarter of 2016, companies would have to prepare their financial year-end report for statutory accounting and their final reports under Solvency I (quarter 4 and annual). Adding Solvency II reporting to this is unduly burdensome in comparison with the objective of assessing industry preparedness. Also, we propose that EIOPA consider a longer reporting deadline than those set out in draft legal texts, we believe that 12 weeks better reflects the costs and challenges to the industry from any simultaneous reporting under the Solvency I and II regimes. Any delay in the Solvency II effective date would result in a matching delay in the implementation dates for interim reporting. Text to this effect is included in EIOPA's introductory paragraph 1.11 however this is an important point which should be dealt with in the guideline itself.	
24	1,12		
25	1,13	Insurers should not be required to submit both internal model and standard formula forms if they are sufficiently progressed in their internal model approval process (IMAP). Building systems to capture data both in the prescribed format, which must be submitted electronically, involves building reporting processes and submission templates that may not be required longer term. For firms in IMAP any standard formula data should be sourced through the IMAP application process, not through the submission of QRTs. We are therefore not in favour of building systems just to meet the interim reporting requirements.	
26	1,14		
27	1,15		
28	1,16		
29	1,17		
30	1,18		
31	1,19		
32	1.20		
33	1,21		
34	1,22		
35	1,23		
36	1,24		
37	1,25		
38	**Section I. General Comments**		
39	1,26	Reporting should be on a best efforts basis. As this is a preparatory exercise, we expect EIOPA and the NCAs to allow reporting on a best efforts basis with the focus being on the process of generating the returns. This may include granting exemptions or simplifications for the purposes of the exercise. Further, from the solo perspective these measures will require parallel running of present SI reporting and the reporting required under the interim measures. As such, having to report exact numbers will create an undue burden on companies.	
40	1,27	The guidance refers to undertakings taking appropriate steps to build systems and structures to deliver high quality information for supervisory purpose. It should be noted that while we would want to use our new IT architecture to calculate the underlying results, certain less material areas of the architecture will still be in development, and so we would expect EIOPA/NCAs to adopt a pragmatic approach to the methods used to prepare the interim disclosures. In addition, the final method of compiling the QRTs and narrative reports may still be in development, and so we may wish to use workarounds to populate the QRTs.	
41	1,28		
42	**Section II. General Comments**		
43	1,29		
44	1.30		
45	1,31		
46	1,32		
47	1,33		
48	1,34		
49	1,35		
50	1,36		
51	1,37		
52	1,38		
53	1,39		
54	1.40		
55	1,41		
56	1,42		
57	1,43		
58	1,44		
59	1,45		
60	1,46		
61	1,47	In the schedule of reporting templates, items TP-F1Q and TPE1Q, listed at h) and i) respectively appear to duplicate reference to these forms at f) and g). They are separately listed for quarterly reporting at 1.52. We suggest that the references at h) and i) in this paragraph be deleted. We would not support the list being extended. The proposal includes a significant broadening of the capital requirements QRTs, as 1.48 states that the data is required for both Internal Model and Standard Formula. This should be recognised as an additional burden to industry and we would not want it to set a precedent for reporting both internal model and standard formula in these templates after the date of implementation of Solvency 2.	
62	1,48	Guideline 13 (para 1.48 and 1.49) indicates that solo entities on a planned internal model approach need to complete the SCR-B2s and SCR-B3s - on both an IM and SF basis. Our current "Go Live" expectation is that they feed into SCR-B2A and SCR-B2B and complete SCR-B2C on IM basis only. Submitting information for both internal model and standard formula might not be sensible in all cases, e.g. where undertakings are already advanced in th pre-application process and therefore might already have sufficiently demonstrated standard formula results to their supervisors. Therefore we propose some flexibility (as supervisors may anyway ask for standard formula information under the pre-approval): "NCAs may abstain from requiring the undertaking to report Standard Formula results during the interim period if all of the following conditions are fulfilled (1) The undertaking has demonstrated its ability to produce and deliver Standard Formula results. (2) The undertaking has demonstrated its understanding of the differences in the assumptions underlying the Standard Formula and the internal model. (3) The NSA or, where appropriate, the relevant college of supervisors, has analysed the undertaking's internal model and received and analysed corresponding results. (4) The undertaking is reporting internal model results during the interim period" We are therefore not in favour of building systems just to meet the interim reporting requirements.	

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63	**Section III. General Comments**		
64	1,49		
65	1.50		
66	1,51		
67	1,52		
68	1,53	Reporting of ring-fenced funds should not be extended to group reporting (as proposed in guideline 18 to report on the reports in paragraphs (f) - (h)). As per the Final Report (issued on 9th July 2012) on CP 11/009 and CP11/011, separate reporting on ring-fenced funds was a solo requirement only. The interim measures consultation indicates that the requirement has been extended to groups as well. We do not support this new requirement as it goes beyond the final QRT reporting requirements.	
69	1,54	A combination of Method 1 and Method 2 for consolidation can be approved by the group supervisor where the exclusive application of Method 1 is not considered appropriate. Based on what we have been led to expect, our working assumption is that we will be allowed to use Method 2 - otherwise the third-country equivalence assumption in the Guidelines has no value resulting in us not being able to compete on a level playing field in third countries like Canada.	
70	1,55	We do not agree with the expansion of the SCR templates to cover both a standard formula basis and an internal model basis. We believe that this comparison data should be sourced through the IMAP application process, not through the submission of QRTs.	
71	1,56		
72	1,57	See comments on 1.53 above	
73	1,58		
74	1,59		
75	1.60		
76	1,61		
77	1,62		
78	**Section IV. General**	We note that the narrative information required appears to have significant cross over with the interim ORSA requirements. We are therefore not in favour of requiring additional reporting in addition to the requirement to prepare an ORSA as it will result in potential repetition and the additional burden of checking consistency.	
79	1,63		
80	1,64		
81	1,65		
82	1,66		
83	1,67		
84	1,68		
85	1,69		
86	1.70		
87	**Section V. General Comments**		
88	1,71		
89	1,72		
90	**Section VI. General Comments**		
91	1,73		
92	1,74		
93	1,75		
94	1,76		
95	1,77		
96	1,78	We presume that the 'reporting policy' referred to in this paragraph does not need to be submitted to the supervisor. Our understanding is that the intention is that the undertaking must prepare and use one, which may be reviewed by the supervisor at any time as part of the supervisor's assessment of the undertaking's preparations for Solvency II.	
97	1,79	Please refer to comments made in response to point 1.11	
98	1.80	Please refer to comments made in response to point 1.11	
99	**Section VII. General Comments**		
100	1,81		
101	**Section VIII. General Comments**		
102	1,82	The timeline for submission of the narrative information appears to be 20 weeks for both Group and Solo information. We presume that this is a drafting error and that the timelines are 20 weeks for the solo narrative reporting and 26 weeks for the Group narrative reports. This section should be reworded to be clear.	
104	1,84	EIOPA should note that insurers will make assumptions on the best possible groupings of assets in the CIC codes. EIOPA should therefore expect that there will be inconsistency with the use of the CIC code across organisations, depending upon whether the CIC codes are sourced from an external data vendor or if they are derived from mapping tables used by the organisation.	
105	1,85		
106	1,86		
107	**Section IX. General Comments**		
108	1,87	QRTs reporting should be completed in thousands. In certain member states, the current Solvency I reports are only required to rounded to thousands and IFRS financial statements are produced in millions. We propose that the QRTs are completed in thousands rather than at the lower level of granularity currently proposed (units).	
109	1,88		
110	1,89		
111	1.90		
112	1,91		
113	1,92		
114	**Compliance and Reporting Rules**		
115	1,93		
116	1,94		
117	1,95		
118	1,96		
119	**Technical Annex I General Comments**		
120	BI-1		
121	BS-C1-2		
122	BS-C1-3		
123	BS-C1D-4		
124	AS-D1-5	Unit linked asset reporting should be excluded from the scope of detailed asset reporting. Asset template D1 interim reporting requires information on unit linked assets. Collection of line by line asset data of unit linked business appears to be driven primarily by Pillar 3 interim reporting. We believe this aspect should be deferred until full adoption of Solvency II as it will be particularly burdensome for limited benefit. Further, we believe that there should be an option to allow the submission of detailed asset data for non-EEA at a much higher level of granularity, i.e. on a summary basis and not on a line-by-line basis. In addition line-by-line analysis of assets should not be required for small holdings in assets that are individually immaterial; these holdings should be aggregated together and presented as a sub-total within the line by line asset analysis on AS-D1.	
125	AS-D1-6		
126	AS-D2O-7		
127	AS-D2O-8		
128	TP-F1-9		
129	TP-E1-10		
130	TP-F1Q-11		
131	TP-E1Q-12		
132	OF-B1Q-13		
133	SCR-B2A-14		
134	SCR-B2A-15	Our understanding of this requirement is that no data is required in relation to entities brought in under Method 2. This is same for all of the capital requirements templates.	
135	SCR-B2B-16		
136	SCR-B2B-17		
137	SCR-B2C-18		
138	SCR-B2C-19		
139	SCR-B3A-20		
140	SCR-B3A-21		
141	SCR-B3B-22		
142	SCR-B3B-23		
143	SCR-B3C-24		

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144	SCR-B3C-25		
145	SCR-B3D-26		
146	SCR-B3D-27		
147	SCR-B3E-28		
148	SCR-B3E-29		
149	SCR-B3F-30		
150	SCR-B3F-31		
151	SCR-B3G-32		
152	SCR-B3G-33		
153	MCR-B4A-34		
154	MCR-B4B-35		
155	G01-36		
156	G03-37		
157	G03-38		
158	G03-39		
159	G04-40		
160	G14-41		
161	**Technical Annex II General Comments**		
162	**Technical Annex III General**		
163	**BI - General Comments**		
164	BI- cell A1		
165	BI- cell A2		
166	BI- cell A3		
167	BI- cell A4		
168	BI- cell A5	The closed list option for this cell includes IFRS or GAAP, we believe that IFRS-EU (IFRS as endorsed by the European Union) should also be included.	
169	BI- cell A6		
170	BI- cell A7		
171	BI- cell A8		
172	BI- cell A9		
173	BI- cell A10		
174	**BS-C1 - General Cor**	In the majority of cases, the cells in the Solvency II and Statutory Accounting columns are the same. We find it confusing that the cells are numbered the same which indicates to us that the values are the same.	
175	BS-C1- cell AS1		
176	BS-C1- cell AS24		
177	BS-C1- cell A2		
178	BS-C1- cell A26		
179	BS-C1- cell A25B		
180	BS-C1- cell A3		
181	BS-C1- cell A4		
182	BS-C1- cell A5		
183	BS-C1- cell A6		
184	BS-C1- cell A7B		
185	BS-C1- cell A7		
186	BS-C1- cell A7A		
187	BS-C1- cell A8E	It is not clear from the cell definition whether accrued interest should be presented separately on the S2 Balance sheet in A29 Other Assets (consistent with IFRS) or included in the Bonds valuation in cells A8 (A-E). Our view is that accrued interest should be presented separately for the following reasons: - Ensures consistency with IFRS and therefore enables the IFRS statutory to be more easily directly compared to the S2 Balance sheet particularly for debt securities carried at fair value for IFRS - A consistent approach with IFRS would be cheaper to implement as it is eliminates a reconciliation item - BS-C1 would still be reconcilable to Asset D1 template (Cell A26 'Total S2 Amount' LESS Cell A30 'Accrued Interest') This is a presentational issue rather than a valuation issue and should be considered in addition to EIOPA's previous comments on the treatment of accrued interest.	
188	BS-C1- cell A8	See comment on Cell A8E	
189	BS-C1- cell A8A	See comment on Cell A8E	
190	BS-C1- cell A8C	See comment on Cell A8E	
191	BS-C1- cell A8D	See comment on Cell A8E	
192	BS-C1- cell A9		
193	BS-C1- cell A10A		
194	BS-C1- cell A10B		
195	BS-C1- cell A11		
196	BS-C1- cell A12		
197	BS-C1- cell A14		
198	BS-C1- cell A14B		
199	BS-C1- cell A14C		
200	BS-C1- cell A14A		
201	BS-C1- cell A16		
202	BS-C1- cell A17A		
203	BS-C1- cell A17		
204	BS-C1- cell A18		
205	BS-C1- cell A19B		
206	BS-C1- cell A18A		
207	BS-C1- cell A19		
208	BS-C1- cell A19A		
209	BS-C1- cell A13		
210	BS-C1- cell A21		
211	BS-C1- cell A20		
212	BS-C1- cell A23		
213	BS-C1- cell A28A		
214	BS-C1- cell A28B		
215	BS-C1- cell A27		
216	BS-C1- cell A29		
217	BS-C1- cell A30		
218	BS-C1- cell LS0		
219	BS-C1- cell L1		
220	BS-C1- cell L1A		
221	BS-C1- cell L2		
222	BS-C1- cell L3		
223	BS-C1- cell L4		
224	BS-C1- cell L4A		
225	BS-C1- cell L5		
226	BS-C1- cell L6		
227	BS-C1- cell LS6F		
228	BS-C1- cell L6B		
229	BS-C1- cell L6C		
230	BS-C1- cell L6D		
231	BS-C1- cell L6E		
232	BS-C1- cell L7		
233	BS-C1- cell L7A		
234	BS-C1- cell L8		
235	BS-C1- cell L9		
236	BS-C1- cell L10		
237	BS-C1- cell L10A		
238	BS-C1- cell L11		
239	BS-C1- cell L12		
240	BS-C1- cell LS14		
241	BS-C1- cell L23		
242	BS-C1- cell L18		
243	BS-C1- cell L22		

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244	BS-C1- cell L13		
245	BS-C1- cell L17		
246	BS-C1- cell L16		
247	BS-C1- cell L19		
248	BS-C1- cell L20		
249	BS-C1- cell L15A		
250	BS-C1- cell L15B		
251	BS-C1- cell L15C		
252	BS-C1- cell L15E		
253	BS-C1- cell L15D		
254	BS-C1- cell L26	Subordinated laities in BOF are counted and reported twice. In the public consultation of July 2012, EIOPA responded that the split in BS-C1 was for presentation purposes, therefore cell L26 should not include the formula for L25A "total Liabilities". As currently drafted, L26 is double counted.	
255	BS-C1- cell L25		
256	BS-C1- cell L25A		
257	BS-C1- cell L27		
258	**BS-C1D – General Comments**		
259	BS-C1D- cell A1		
260	BS-C1D- cell B1		
261	BS-C1D- cell A3		
262	BS-C1D- cell A4		
263	BS-C1D- cell A5		
264	BS-C1D- cell A5A		
265	BS-C1D- cell A6		
266	BS-C1D- cell A7		
267	BS-C1D- cell A7A		
268	BS-C1D- cell A8		
269	BS-C1D- cell A9		
270	BS-C1D- cell A10		
271	BS-C1D- cell A11		
272	BS-C1D- cell A12		
273	BS-C1D- cell A13		
274	BS-C1D- cell A14		
275	BS-C1D- cell A15		
276	**AS-D1- General Comment**	Compared to the July 2012 EIOPA QRT Stable platform there have been a number of changes in cell definitions per the July 2012 EIOPA "Log" and the "instructions" in Technical Annex II (for example Issuer Sector is defined as a closed list based on GICS rather than NACE). To avoid wasted expenditure in implementation it is important that EIOPA clarify this would be the reporting basis moving forward.	
277	AS-D1- cell A1	We believe that the closed list option for this cell - "Life"; "Non-Life"; "General"; "Ring-fenced funds" - would benefit from a "General" option. This would allow for a clear alternative other than those listed, for example shareholders' funds.	
278	AS-D1- cell A2		
279	AS-D1- cell A3		
280	AS-D1- cell A4		
281	AS-D1- cell A5		
282	AS-D1- cell A6		
283	AS-D1- cell A7		
284	AS-D1- cell A8		
285	AS-D1- cell A9	To avoid wasted implementation expenditure, EIOPA should clarify that the GIC codes which appear in the latest draft QRTs will be used as the reporting basis moving forward. EIOPA should also consider whether this new coding system covers all industry sectors. In this respect, we query where Government Bonds would be dealt with.	
286	AS-D1- cell A10		
287	AS-D1- cell A11		
288	AS-D1- cell A12		
289	AS-D1- cell A13		
290	AS-D1- cell A15		
291	AS-D1- cell A16	We support that participations are now included in the Group AS-D1 template however we note that the closed list option does not include subsidiaries which are included on the basis of the adjusted equity method under Method 1 (see L2 Article 323 bis SCG3 1(f)). This would apply to non-insurance and non-financial sector subsidiaries, which are neither ancillary service companies or insurance holding companies.	
292	AS-D1- cell A17		
293	AS-D1- cell A18		
294	AS-D1- cell A20		
295	AS-D1- cell A22		
296	AS-D1- cell A23		
297	AS-D1- cell A24	For non-participations there are 3 possibilities of classification - QMP, QMPS and AVM. We would like to clarify that it is the intention of industry to align these with the IFRS Fair Value hierarchy classifications (i.e. QMP=FV1, QMPS=FV2, AVM=FV3). IFRS FV2 requires valuation to based on observable market inputs, which would only be appropriate if they related to assets with similar characteristics (i.e. credit risk, duration, liquidity). If the QRT and IFRS classifications are not aligned this would greatly increase the cost of implementation for little additional benefit.	
298	AS-D1- cell A25	The historical acquisition price is not retained in the administration of most insurance company's investments in investment funds, this cell will be difficult to report as a result.	
299	AS-D1- cell A26		
300	AS-D1- cell A28		
301	AS-D1- cell A30		
302	AS-D1- cell A50		
303	**AS–D2O- General Comments**		
304	AS-D2O- cell A1		
305	AS-D2O- cell A2		
306	AS-D2O- cell A3		
307	AS-D2O- cell A4		
308	AS-D2O- cell A5		
309	AS-D2O- cell A6		
310	AS-D2O- cell A7		
311	AS-D2O- cell A8		
312	AS-D2O- cell A9		
313	AS-D2O- cell A10		
314	AS-D2O- cell A11		
315	AS-D2O- cell A13	The closed list of options for this cell includes "micro hedging", "macro hedging" and "efficient portfolio management". We do not believe that this list is extensive enough, for example it is not clear how to deal with derivatives held for speculative positions.	
316	AS-D2O- cell A14		
317	AS-D2O- cell A15		
318	AS-D2O- cell A16		
319	AS-D2O- cell A17		
320	AS-D2O- cell A19		
321	AS-D2O- cell A20		
322	AS-D2O- cell A21		
323	AS-D2O- cell A22		
324	AS-D2O- cell A23		
325	AS-D2O- cell A24		
326	AS-D2O- cell A25		
327	AS-D2O- cell A26		
328	AS-D2O- cell A27		
329	AS-D2O- cell A28		

	B	C	D
330	AS-D2O- cell A29	We query whether there is an error in the LOG for this cell, the closed list for S2 valuation method (has only 2 methods - Mark to model and Mark to market) is inconsistent with Asset Template D1 (cell A24), which lists 3 possibilities for non-participations: • Quoted market price in active markets for the same assets (QMP) • Quoted market price in active markets for similar assets (QMPS) • Alternative valuation methods (AVM) A consistent approach with classifications aligned to the IFRS Fair Value hierarchy would make implementation easier.	
331	AS-D2O- cell A31		
332	AS-D2O- cell A32		
333	AS-D2O- cell A33		
334	AS-D2O- cell A34		
335	AS-D2O- cell A35		
336	AS-D2O- cell A50		
337	**TP-F1- General Comments**	(J series) The log-file states the requirement as being the "Amount of gross BE by country of the location of risk underwritten, when the country is the home country.." for LoBs including both Life and Health accepted reinsurance. For accepted reinsurance business, it is not possible to systematically provide a country split of the gross best estimate by risk location due to the fact that the location of original policyholders is unknown. Coverage is often provided on a worldwide basis irrespective of the location of the policyholder whose policy is reinsured.	
338	TP-F1- cell J1,J2,J4,J6,J7,J9,J10 ,J12,J13,J14		
339	TP-F1- cell JA1,JA2,JA4,JA6,JA7, JA9,JA10,JA12,JA13, JA14		
340	TP-F1- cell JE1,JE2,JE4,JE6,JE7, JE9,JE10,JE12,JE13,J E14		
341	TP-F1- cell JF1,JF2,JF4,JF6,JF7,J F9,JF10,JF12,JF13,JF 14		
342	**TP-E1- General Comments**	(Cells A5-Q13) It is not always possible to accurately capture the impact of reinsurance or retrocession at the LoB level. This is the case for coverages which go across lines of business (e.g. whole account protections or stop loss covers) where breakdown to the LoB level is not required since protection is provided at a portfolio level. Technical provisions are calculated at the level of the protection and any further splits would be artificial.	
343	TP-E1- cells A43-L43		
344	TP-E1- cells A44-L44		
345	TP-E1- cells A45-L45		
346	TP-E1- cells A46-L46		
347	TP-E1- cells Q43-Q46		
348	**TP-F1Q- General Comments**		
349	TP-F1Q- cells A1		
350	TP-F1Q- cells A3		
351	TP-F1Q- cells A5		
352	TP-F1Q- cells A6		
353	TP-F1Q- cells A7		
354	TP-F1Q- cells A7A		
355	TP-F1Q- cells A7B		
356	TP-F1Q- cells A7C		
357	TP-F1Q- cells A9		
358	TP-F1Q- cells A10		
359	TP-F1Q- cells A12		
360	TP-F1Q- cells A13		
361	TP-F1Q- cells A14		
362	TP-F1Q- cells B1		
363	TP-F1Q- cells B2	See general comment	
364	TP-F1Q- cells B3	See general comment	
365	TP-F1Q- cells B4	See general comment	
366	TP-F1Q- cells B5	See general comment	
367	TP-F1Q- cells B6		
368	TP-F1Q- cells B7		
369	TP-F1Q- cells B9		
370	TP-F1Q- cells B10		
371	TP-F1Q- cells B11		
372	TP-F1Q- cells B12		
373	TP-F1Q- cells B13		
374	TP-F1Q- cells B14		
375	TP-F1Q- cells C1		
376	TP-F1Q- cells C2	See general comment	
377	TP-F1Q- cells C3	See general comment	
378	TP-F1Q- cells C4	See general comment	
379	TP-F1Q- cells C5	See general comment	
380	TP-F1Q- cells C6		
381	TP-F1Q- cells C7		
382	TP-F1Q- cells C9		
383	TP-F1Q- cells C10		
384	TP-F1Q- cells C11		
385	TP-F1Q- cells C12		
386	TP-F1Q- cells C13		
387	TP-F1Q- cells C14		
388	TP-F1Q- cells E1		
389	TP-F1Q- cells E2		
390	TP-F1Q- cells E4		
391	TP-F1Q- cells E6		
392	TP-F1Q- cells E7		
393	TP-F1Q- cells E9		
394	TP-F1Q- cells E10		
395	TP-F1Q- cells E12		
396	TP-F1Q- cells E13		
397	TP-F1Q- cells E14		
398	TP-F1Q- cells F1		
399	TP-F1Q- cells F2		
400	TP-F1Q- cells F4		
401	TP-F1Q- cells F6		
402	TP-F1Q- cells F7		
403	TP-F1Q- cells F9		
404	TP-F1Q- cells F10		
405	TP-F1Q- cells F12		
406	TP-F1Q- cells F13		
407	TP-F1Q- cells F14		
408	**TP-E1Q- General Comments**		
409	TP-E1Q- cells A1-P1		
410	TP-E1Q- cells Q1		
411	TP-E1Q- cells A5-P5		
412	TP-E1Q- cells A12-P12		
413	TP-E1Q- cells A13-P13		
414	TP-E1Q- cells Q5-Q13		
415	TP-E1Q- cells A14-P14		
416	TP-E1Q- cells A21-P21		
417	TP-E1Q- cells A22-P22		
418	TP-E1Q- cells Q14-Q22		

	B	C	D
419	TP-E1Q- cells A23-P23		
420	TP-E1Q- cells A24-P24		
421	TP-E1Q- cells A25-P25		
422	TP-E1Q- cells Q23		
423	TP-E1Q- cells Q24		
424	TP-E1Q- cells Q25		
425	TP-E1Q- cells A26-P26		
426	TP-E1Q- cells A27-P27		
427	TP-E1Q- cells A28-P28		
428	TP-E1Q- cells Q26		
429	TP-E1Q- cells Q27		
430	TP-E1Q- cells Q28		
431	**OF-B1Q – General C**	The fact that group and solo reporting has been merged into one template makes the new requirements very confusing. It is now very difficult to see what exactly is required at group and solo level.	
432	OF-B1Q- cell A1		
433	OF-B1Q- cell B1		
434	OF-B1Q- cell C1		
435	OF-B1Q- cell A1A		
436	OF-B1Q- cell C1A		
437	OF-B1Q- cell A2		
438	OF-B1Q- cell B2		
439	OF-B1Q- cell C2		
440	OF-B1Q- cell A3		
441	OF-B1Q- cell B3		
442	OF-B1Q- cell C3		
443	OF-B1Q- cell A4		
444	OF-B1Q- cell B4		
445	OF-B1Q- cell C4		
446	OF-B1Q- cell D4		
447	OF-B1Q- cell A5		
448	OF-B1Q- cell B5		
449	OF-B1Q- cell C5		
450	OF-B1Q- cell D5		
451	OF-B1Q- cell A6		
452	OF-B1Q- cell B6		
453	OF-B1Q- cell A7		
454	OF-B1Q- cell B7		
455	OF-B1Q- cell A8		
456	OF-B1Q- cell B8		
457	OF-B1Q- cell C8		
458	OF-B1Q- cell D8		
459	OF-B1Q- cell A9		
460	OF-B1Q- cell B9		
461	OF-B1Q- cell C9		
462	OF-B1Q- cell D9		
463	OF-B1Q- cell A10		
464	OF-B1Q- cell B10		
465	OF-B1Q- cell C10		
466	OF-B1Q- cell D10		
467	OF-B1Q- cell A11		
468	OF-B1Q- cell B11		
469	OF-B1Q- cell C11		
470	OF-B1Q- cell D11		
471	OF-B1Q- cell A12		
472	OF-B1Q- cell B12		
473	OF-B1Q- cell A12A		
474	OF-B1Q- cell B12A		
475	OF-B1Q- cell A13		
476	OF-B1Q- cell B13		
477	OF-B1Q- cell C13		
478	OF-B1Q- cell D13		
479	OF-B1Q- cell A14		
480	OF-B1Q- cell B14		
481	OF-B1Q- cell C14		
482	OF-B1Q- cell D14		
483	OF-B1Q- cell A15		
484	OF-B1Q- cell D15		
485	OF-B1Q- cell A15A		
486	OF-B1Q- cell D15A		
487	OF-B1Q- cell A16		
488	OF-B1Q- cell B16		
489	OF-B1Q- cell B16A		
490	OF-B1Q- cell C16		
491	OF-B1Q- cell D16		
492	OF-B1Q- cell A17		
493	OF-B1Q- cell B17		
494	OF-B1Q- cell B17A		
495	OF-B1Q- cell C17		
496	OF-B1Q- cell D17		
497	OF-B1Q- cell A18		
498	OF-B1Q- cell B18		
499	OF-B1Q- cell B18A		
500	OF-B1Q- cell C18		
501	OF-B1Q- cell D18		
502	OF-B1Q- cell A19		
503	OF-B1Q- cell B19		
504	OF-B1Q- cell B19A		
505	OF-B1Q- cell C19		
506	OF-B1Q- cell D19		
507	OF-B1Q- cell B502		
508	OF-B1Q- cell A503		
509	OF-B1Q- cell B503		
510	OF-B1Q- cell C503		
511	OF-B1Q- cell D503		
512	OF-B1Q- cell A603		
513	OF-B1Q- cell B603		
514	OF-B1Q- cell C603		
515	OF-B1Q- cell D603		
516	OF-B1Q- cell A604		
517	OF-B1Q- cell B604		
518	OF-B1Q- cell C604		
519	OF-B1Q- cell D604		
520	OF-B1Q- cell E604		
521	OF-B1Q- cell A605		
522	OF-B1Q- cell B605		
523	OF-B1Q- cell C605		
524	OF-B1Q- cell D605		
525	OF-B1Q- cell E605		
526	OF-B1Q- cell A606		
527	OF-B1Q- cell B606		
528	OF-B1Q- cell C606		
529	OF-B1Q- cell D606		
530	OF-B1Q- cell E606		

	B	C	D
531	OF-B1Q- cell A607		
532	OF-B1Q- cell B607		
533	OF-B1Q- cell C607		
534	OF-B1Q- cell D607		
535	OF-B1Q- cell E607		
536	OF-B1Q- cell A20		
537	OF-B1Q- cell B20		
538	OF-B1Q- cell B20A		
539	OF-B1Q- cell C20		
540	OF-B1Q- cell D20		
541	OF-B1Q- cell A21		
542	OF-B1Q- cell B21		
543	OF-B1Q- cell B21A		
544	OF-B1Q- cell C21		
545	OF-B1Q- cell D21		
546	OF-B1Q- cell A42		
547	OF-B1Q- cell C42		
548	OF-B1Q- cell D42		
549	OF-B1Q- cell A43		
550	OF-B1Q- cell C43	Formula is based on inapplicable cells for the preparatory phase	
551	OF-B1Q- cell D43	Formula is based on inapplicable cells for the preparatory phase	
552	OF-B1Q- cell A44		
553	OF-B1Q- cell C44	Formula is based on inapplicable cells for the preparatory phase	
554	OF-B1Q- cell D44	Formula is based on inapplicable cells for the preparatory phase	
555	OF-B1Q- cell A46		
556	OF-B1Q- cell B46		
557	OF-B1Q- cell C46		
558	OF-B1Q- cell D46		
559	OF-B1Q- cell E46		
560	OF-B1Q- cell A47		
561	OF-B1Q- cell B47		
562	OF-B1Q- cell C47		
563	OF-B1Q- cell D47		
564	OF-B1Q- cell A50		
565	OF-B1Q- cell B50		
566	OF-B1Q- cell C50		
567	OF-B1Q- cell D50		
568	OF-B1Q- cell E50		
569	OF-B1Q- cell A51		
570	OF-B1Q- cell B51		
571	OF-B1Q- cell C51		
572	OF-B1Q- cell D51		
573	OF-B1Q- cell A52		
574	OF-B1Q- cell A53		
575	OF-B1Q- cell A45		
576	OF-B1Q- cell A45A		
577	OF-B1Q- cell A45B		
578	OF-B1Q- cell A45C		
579	OF-B1Q- cell A45D		
580	OF-B1Q- cell B45D		
581	OF-B1Q- cell C45D		
582	OF-B1Q- cell D45D		
583	OF-B1Q- cell E45D		
584	OF-B1Q- cell A45E		
585	OF-B1Q- cell B45E		
586	OF-B1Q- cell C45E		
587	OF-B1Q- cell D45E		
588	OF-B1Q- cell E45E		
589	OF-B1Q- cell A48		
590	OF-B1Q- cell B48	Formula not OK and not complete on several items, it is unclear how and where the OFS entities are excluded	
591	OF-B1Q- cell C48	Formula not OK and not complete on several items, it is unclear how and where the OFS entities are excluded	
592	OF-B1Q- cell D48	Formula not OK and not complete on several items, it is unclear how and where the OFS entities are excluded	
593	OF-B1Q- cell E48	Formula not OK and not complete on several items, it is unclear how and where the OFS entities are excluded	
594	OF-B1Q- cell A49		
595	OF-B1Q- cell B49		
596	OF-B1Q- cell C49		
597	OF-B1Q- cell D49		
598	OF-B1Q- cell A50A		
599	OF-B1Q- cell B50A		
600	OF-B1Q- cell C50A		
601	OF-B1Q- cell D50A		
602	OF-B1Q- cell E50A		
603	OF-B1Q- cell A51A		
604	OF-B1Q- cell B51A		
605	OF-B1Q- cell C51A		
606	OF-B1Q- cell D51A		
607	OF-B1Q- cell A52A		
608	OF-B1Q- cell A53A		
609	OF-B1Q- cell A53B		
610	OF-B1Q- cell B23		
611	OF-B1Q- cell B24		
612	OF-B1Q- cell B25		
613	OF-B1Q- cell B26		
614	OF-B1Q- cell B27		
615	OF-B1Q- cell B28		
616	OF-B1Q- cell B29		
617	OF-B1Q- cell B29A		
618	OF-B1Q- cell A30		
619	OF-B1Q- cell A31		
620	OF-B1Q- cell A32		
621	**SCR – B2A – General Comment**		
622	SCR - B2A - cell A1		
623	SCR - B2A - cell B1		
624	SCR - B2A - cell A01		
625	SCR - B2A - cell A2		
626	SCR - B2A - cell B2		
627	SCR - B2A - cell A02		
628	SCR - B2A - cell A3		
629	SCR - B2A - cell B3		
630	SCR - B2A - cell A03		
631	SCR - B2A - cell A4		
632	SCR - B2A - cell B4		
633	SCR - B2A - cell A04		
634	SCR - B2A - cell A5		
635	SCR - B2A - cell B5		
636	SCR - B2A - cell A05		
637	SCR - B2A - cell A6		
638	SCR - B2A - cell B6		
639	SCR - B2A - cell A7		
640	SCR - B2A - cell B7		
641	SCR - B2A - cell A07		
642	SCR - B2A - cell A10		
643	SCR - B2A - cell B10		

	B	C	D
644	SCR - B2A - cell A11		
645	SCR - B2A - cell A12		
646	SCR - B2A - cell A13		
647	SCR - B2A - cell A013		
648	SCR - B2A - cell A14A		
649	SCR - B2A - cell A14C		
650	SCR - B2A - cell A8		
651	SCR - B2A - cell A9		
652	SCR - B2A - cell A17		
653	SCR - B2A - cell A15		
654	SCR - B2A - cell A15A		
655	SCR - B2A - cell A15B		
656	SCR - B2A - cell A15C		
657	SCR - B2A - cell A16		
658	SCR - B2A - cell A18		
659	SCR - B2A - cell A20		
660	SCR - B2A - cell A21		
661	SCR - B2A - cell A14B		
662	SCR - B2A - cell A14		
663	SCR - B2A - cell A11A		
664	SCR - B2A - cell A11B		
665	**SCR - B2B – General Comment**		
666	SCR - B2B- cell A1		
667	SCR - B2B- cell A1A		
668	SCR - B2B- cell A1B		
669	SCR - B2B- cell A1C		
670	SCR - B2B- cell B1		
671	SCR - B2B- cell C1		
672	SCR - B2B- cell B2		
673	SCR - B2B- cell C2		
674	SCR - B2B- cell B3		
675	SCR - B2B- cell C3		
676	SCR - B2B- cell B4		
677	SCR - B2B- cell C4		
678	SCR - B2B- cell B5		
679	SCR - B2B- cell B6		
680	SCR - B2B- cell B7		
681	SCR - B2B- cell C5		
682	SCR - B2B- cell C6		
683	SCR - B2B- cell B8		
684	SCR - B2B- cell B8AA		
685	SCR - B2B- cell B8A		
686	SCR - B2B- cell A11A		
687	SCR - B2B- cell A11B		
688	**SCR - B2C – General Comment**		
689	SCR - B2C- cell A1		
690	SCR - B2C- cell A1A		
691	SCR - B2C- cell A1B		
692	SCR - B2C- cell A1C		
693	SCR - B2C- cell B1		
694	SCR - B2C- cell C1		
695	SCR - B2C- cell B2		
696	SCR - B2C- cell C2		
697	SCR - B2C- cell B3		
698	SCR - B2C- cell C3		
699	SCR - B2C- cell B4		
700	SCR - B2C- cell C4		
701	SCR - B2C- cell B5		
702	SCR - B2C- cell B6		
703	SCR - B2C- cell B7		
704	SCR - B2C- cell B7A		
705	SCR - B2C- cell B7B		
706	SCR - B2C- cell B7C		
707	SCR - B2C- cell B8		
708	SCR - B2C- cell B9		
709	SCR - B2C- cell B10		
710	SCR - B2C- cell B12		
711	SCR - B2C- cell B13		
712	SCR - B2C- cell C5		
713	SCR - B2C- cell C6		
714	SCR - B2C- cell B14		
715	SCR - B2C- cell B14AA		
716	SCR - B2C- cell B14A		
717	SCR - B2C- cell A11A		
718	SCR - B2C- cell A11B		
719	**SCR - B3A – General Comment**		
720	SCR - B3A – cell A00		
721	SCR - B3A – cell AA01		
722	SCR - B3A – cell AA02		
723	SCR - B3A – cell AA03		
724	SCR - B3A – cell A30		
725	SCR - B3A- cell C0		
726	SCR - B3A- cell D0		
727	SCR - B3A- cell A1		
728	SCR - B3A- cell A2		
729	SCR - B3A- cell A1A		
730	SCR - B3A- cell A2A		
731	SCR - B3A- cell B1		
732	SCR - B3A- cell B2		
733	SCR - B3A- cell B1A		
734	SCR - B3A- cell B2A		
735	SCR - B3A- cell C1		
736	SCR - B3A- cell C2		
737	SCR - B3A- cell B1B		
738	SCR - B3A- cell B2B		
739	SCR - B3A- cell D1		
740	SCR - B3A- cell D2		
741	SCR - B3A- cell C3		
742	SCR - B3A- cell D3		
743	SCR - B3A- cell A4		
744	SCR - B3A- cell A4A		
745	SCR - B3A- cell B4		
746	SCR - B3A- cell B4A		
747	SCR - B3A- cell C4		
748	SCR - B3A- cell B4B		
749	SCR - B3A- cell D4		
750	SCR - B3A- cell A5		
751	SCR - B3A- cell B5		
752	SCR - B3A- cell A6		
753	SCR - B3A- cell B6		
754	SCR - B3A- cell A7		
755	SCR - B3A- cell B7		
756	SCR - B3A- cell A8		

	B	C	D
757	SCR - B3A- cell A8A		
758	SCR - B3A- cell B8		
759	SCR - B3A- cell B8A		
760	SCR - B3A- cell C8		
761	SCR - B3A- cell B8B		
762	SCR - B3A- cell D8		
763	SCR - B3A- cell A9		
764	SCR - B3A- cell B9		
765	SCR - B3A- cell A10		
766	SCR - B3A- cell B10		
767	SCR - B3A- cell A11		
768	SCR - B3A- cell B11		
769	SCR - B3A- cell A12		
770	SCR - B3A- cell A12A		
771	SCR - B3A- cell B12		
772	SCR - B3A- cell B12A		
773	SCR - B3A- cell C12		
774	SCR - B3A- cell B12B		
775	SCR - B3A- cell D12		
776	SCR - B3A- cell C13		
777	SCR - B3A- cell D13		
778	SCR - B3A- cell A14		
779	SCR - B3A- cell A14A		
780	SCR - B3A- cell B14		
781	SCR - B3A- cell B14A		
782	SCR - B3A- cell C14		
783	SCR - B3A- cell B14B		
784	SCR - B3A- cell D14		
785	SCR - B3A- cell C15		
786	SCR - B3A- cell D15		
787	SCR - B3A- cell A16		
788	SCR - B3A- cell A16A		
789	SCR - B3A- cell B16		
790	SCR - B3A- cell B16A		
791	SCR - B3A- cell C16		
792	SCR - B3A- cell B16B		
793	SCR - B3A- cell D16		
794	SCR - B3A- cell A17		
795	SCR - B3A- cell A17A		
796	SCR - B3A- cell B17		
797	SCR - B3A- cell B17A		
798	SCR - B3A- cell C17		
799	SCR - B3A- cell B17B		
800	SCR - B3A- cell D17		
801	SCR - B3A- cell A18		
802	SCR - B3A- cell A18A		
803	SCR - B3A- cell B18		
804	SCR - B3A- cell B18A		
805	SCR - B3A- cell C18		
806	SCR - B3A- cell B18B		
807	SCR - B3A- cell D18		
808	SCR - B3A- cell A19		
809	SCR - B3A- cell A19A		
810	SCR - B3A- cell C19		
811	SCR - B3A- cell D19		
812	SCR - B3A- cell A20		
813	SCR - B3A- cell A20A		
814	SCR - B3A- cell C20		
815	SCR - B3A- cell D20		
816	SCR - B3A- cell C22		
817	SCR - B3A- cell D22		
818	SCR - B3A- cell C23		
819	SCR - B3A- cell D23		
820	**SCR - B3B – General Comment**		
821	SCR - B3B – cell A00		
822	SCR - B3B – cell A001		
823	SCR - B3B – cell A30		
824	SCR - B3B – cell A10		
825	SCR - B3B- cell A1		
826	SCR - B3B- cell B1		
827	SCR - B3B- cell C0		
828	SCR - B3B- cell C1		
829	SCR - B3B- cell A2		
830	SCR - B3B- cell A3		
831	SCR - B3B- cell C3		
832	SCR - B3B- cell D4		
833	SCR - B3B- cell C4		
834	**SCR - B3C – General Comment**		
835	SCR - B3C – cell A01		
836	SCR - B3C – cell A02		
837	SCR - B3C – cell A03		
838	SCR - B3C – cell A04		
839	SCR - B3C – cell A05		
840	SCR - B3C - cell A06		
841	SCR - B3C – cell A001		
842	SCR - B3C – cell A30		
843	SCR - B3C- cell A1		
844	SCR - B3C- cell A1A		
845	SCR - B3C- cell B1		
846	SCR - B3C- cell B1A		
847	SCR - B3C- cell C1		
848	SCR - B3C- cell B1B		
849	SCR - B3C- cell D1		
850	SCR - B3C- cell A2		
851	SCR - B3C- cell A2A		
852	SCR - B3C- cell B2		
853	SCR - B3C- cell B2A		
854	SCR - B3C- cell C2		
855	SCR - B3C- cell B2B		
856	SCR - B3C- cell D2		
857	SCR - B3C- cell A3		
858	SCR - B3C- cell A3A		
859	SCR - B3C- cell B3		
860	SCR - B3C- cell B3A		
861	SCR - B3C- cell C3		
862	SCR - B3C- cell B3B		
863	SCR - B3C- cell D3		
864	SCR - B3C- cell C04		
865	SCR - B3C- cell D04		
866	SCR - B3C- cell A4		
867	SCR - B3C- cell A4A		
868	SCR - B3C- cell B4		
869	SCR - B3C- cell B4A		

	B	C	D
870	SCR - B3C- cell C4		
871	SCR - B3C- cell B4B		
872	SCR - B3C- cell D4		
873	SCR - B3C- cell A5		
874	SCR - B3C- cell A5A		
875	SCR - B3C- cell B5		
876	SCR - B3C- cell B5A		
877	SCR - B3C- cell C5		
878	SCR - B3C- cell B5B		
879	SCR - B3C- cell D5		
880	SCR - B3C- cell A6		
881	SCR - B3C- cell A6A		
882	SCR - B3C- cell B6		
883	SCR - B3C- cell B6A		
884	SCR - B3C- cell C6		
885	SCR - B3C- cell B6B		
886	SCR - B3C- cell D6		
887	SCR - B3C- cell A7		
888	SCR - B3C- cell A7A		
889	SCR - B3C- cell B7		
890	SCR - B3C- cell B7A		
891	SCR - B3C- cell C7		
892	SCR - B3C- cell B7B		
893	SCR - B3C- cell D7		
894	SCR - B3C- cell A8		
895	SCR - B3C- cell A8A		
896	SCR - B3C- cell B8		
897	SCR - B3C- cell B8A		
898	SCR - B3C- cell C8		
899	SCR - B3C- cell B8B		
900	SCR - B3C- cell D8		
901	SCR - B3C- cell A9		
902	SCR - B3C- cell A9A		
903	SCR - B3C- cell B9		
904	SCR - B3C- cell B9A		
905	SCR - B3C- cell C9		
906	SCR - B3C- cell B9B		
907	SCR - B3C- cell D9		
908	SCR - B3C- cell C10		
909	SCR - B3C- cell D10		
910	SCR - B3C- cell C11		
911	SCR - B3C- cell D11		
912	**SCR - B3D – General Comment**		
913	SCR - B3D – cell A01		
914	SCR - B3D – cell A02		
915	SCR - B3D – cell A03		
916	SCR - B3D – cell A04		
917	SCR - B3D – cell A05		
918	SCR - B3C – cell A001		
919	SCR - B3C – cell A30		
920	SCR - B3D- cell A1		
921	SCR - B3D- cell A1A		
922	SCR - B3D- cell B1		
923	SCR - B3D- cell B1A		
924	SCR - B3D- cell C1		
925	SCR - B3D- cell B1B		
926	SCR - B3D- cell D1		
927	SCR - B3D- cell A2		
928	SCR - B3D- cell A2A		
929	SCR - B3D- cell B2		
930	SCR - B3D- cell B2A		
931	SCR - B3D- cell C2		
932	SCR - B3D- cell B2B		
933	SCR - B3D- cell D2		
934	SCR - B3D- cell A3		
935	SCR - B3D- cell A3A		
936	SCR - B3D- cell B3		
937	SCR - B3D- cell B3A		
938	SCR - B3D- cell C3		
939	SCR - B3D- cell B3B		
940	SCR - B3D- cell D3		
941	SCR - B3D- cell C04		
942	SCR - B3D- cell D04		
943	SCR - B3D- cell A4		
944	SCR - B3D- cell A4A		
945	SCR - B3D- cell B4		
946	SCR - B3D- cell B4A		
947	SCR - B3D- cell C4		
948	SCR - B3D- cell B4B		
949	SCR - B3D- cell D4		
950	SCR - B3D- cell A5		
951	SCR - B3D- cell A5A		
952	SCR - B3D- cell B5		
953	SCR - B3D- cell B5A		
954	SCR - B3D- cell C5		
955	SCR - B3D- cell B5B		
956	SCR - B3D- cell D5		
957	SCR - B3D- cell A6		
958	SCR - B3D- cell A6A		
959	SCR - B3D- cell B6		
960	SCR - B3D- cell B6A		
961	SCR - B3D- cell C6		
962	SCR - B3D- cell B6B		
963	SCR - B3D- cell D6		
964	SCR - B3D- cell A7		
965	SCR - B3D- cell A7A		
966	SCR - B3D- cell B7		
967	SCR - B3D- cell B7A		
968	SCR - B3D- cell C7		
969	SCR - B3D- cell B7B		
970	SCR - B3D- cell D7		
971	SCR - B3D- cell A8		
972	SCR - B3D- cell A8A		
973	SCR - B3D- cell B8		
974	SCR - B3D- cell B8A		
975	SCR - B3D- cell C8		
976	SCR - B3D- cell B8B		
977	SCR - B3D- cell D8		
978	SCR - B3D- cell C9		
979	SCR - B3D- cell D9		
980	SCR - B3D- cell C10		
981	SCR - B3D- cell D10		
982	SCR - B3D- cell C12		

	B	C	D
983	SCR - B3D- cell D12		
984	SCR - B3D- cell E12		
985	SCR - B3D- cell F12		
986	SCR - B3D- cell C13		
987	SCR - B3D- cell D13		
988	SCR - B3D- cell E13		
989	SCR - B3D- cell F13		
990	SCR - B3D- cell C14		
991	SCR - B3D- cell D14		
992	SCR - B3D- cell E14		
993	SCR - B3D- cell F14		
994	SCR - B3D- cell C15		
995	SCR - B3D- cell D15		
996	SCR - B3D- cell E15		
997	SCR - B3D- cell F15		
998	SCR - B3D- cell A16		
999	SCR - B3D- cell F16		
1000	SCR - B3D- cell A17		
1001	SCR - B3D- cell A18		
1002	SCR - B3D- cell A18A		
1003	SCR - B3D- cell B18		
1004	SCR - B3D- cell B18B		
1005	SCR - B3D- cell D18		
1006	SCR - B3D- cell D19		
1007	SCR - B3D- cell D20		
1008	SCR - B3D- cell B21		
1009	SCR - B3D- cell A21		
1010	SCR - B3D- cell B22		
1011	SCR - B3D- cell A22		
1012	SCR - B3D- cell B23		
1013	SCR - B3D- cell A23		
1014	SCR - B3D- cell B24		
1015	SCR - B3D- cell A24		
1016	SCR - B3D- cell B25		
1017	SCR - B3D- cell A25		
1018	SCR - B3D- cell B26		
1019	SCR - B3D- cell A26		
1020	SCR - B3D- cell B27		
1021	SCR - B3D- cell A27		
1022	**SCR - B3E – General Comment**		
1023	SCR - B3E- cell A001		
1024	SCR - B3E- cell A30		
1025	SCR - B3E- cell C1		
1026	SCR - B3E- cell D1		
1027	SCR - B3E- cell E1		
1028	SCR - B3E- cell F1		
1029	SCR - B3E- cell C2		
1030	SCR - B3E- cell D2		
1031	SCR - B3E- cell E2		
1032	SCR - B3E- cell F2		
1033	SCR - B3E- cell C3		
1034	SCR - B3E- cell D3		
1035	SCR - B3E- cell E3		
1036	SCR - B3E- cell F3		
1037	SCR - B3E- cell C4		
1038	SCR - B3E- cell D4		
1039	SCR - B3E- cell E4		
1040	SCR - B3E- cell F4		
1041	SCR - B3E- cell C5		
1042	SCR - B3E- cell D5		
1043	SCR - B3E- cell E5		
1044	SCR - B3E- cell F5		
1045	SCR - B3E- cell C6		
1046	SCR - B3E- cell D6		
1047	SCR - B3E- cell E6		
1048	SCR - B3E- cell F6		
1049	SCR - B3E- cell C7		
1050	SCR - B3E- cell D7		
1051	SCR - B3E- cell E7		
1052	SCR - B3E- cell F7		
1053	SCR - B3E- cell C8		
1054	SCR - B3E- cell D8		
1055	SCR - B3E- cell E8		
1056	SCR - B3E- cell F8		
1057	SCR - B3E- cell C9		
1058	SCR - B3E- cell D9		
1059	SCR - B3E- cell E9		
1060	SCR - B3E- cell F9		
1061	SCR - B3E- cell C10		
1062	SCR - B3E- cell D10		
1063	SCR - B3E- cell E10		
1064	SCR - B3E- cell F10		
1065	SCR - B3E- cell C11		
1066	SCR - B3E- cell D11		
1067	SCR - B3E- cell E11		
1068	SCR - B3E- cell F11		
1069	SCR - B3E- cell C12		
1070	SCR - B3E- cell D12		
1071	SCR - B3E- cell E12		
1072	SCR - B3E- cell F12		
1073	SCR - B3E- cell A13		
1074	SCR - B3E- cell F13		
1075	SCR - B3E- cell A14		
1076	SCR - B3E- cell A15		
1077	SCR - B3E- cell A15A		
1078	SCR - B3E- cell B15		
1079	SCR - B3E- cell B15A		
1080	SCR - B3E- cell C15		
1081	SCR - B3E- cell A16		
1082	SCR - B3E- cell A17		
1083	SCR - B3E- cell A18		
1084	**SCR - B3F – General Comment**		
1085	SCR - B3F- cell A1		
1086	SCR - B3F- cell A2-A6		
1087	SCR - B3F- cell A7		
1088	SCR - B3F- cell B1		
1089	SCR - B3F- cell B2-B6		
1090	SCR - B3F- cell B7		
1091	SCR - B3F- cell C1		
1092	SCR - B3F- cell C2-C6		
1093	SCR - B3F- cell C7		
1094	SCR - B3F- cell A8		
1095	SCR - B3F- cell B8		

	B	C	D
1096	SCR - B3F- cell C8		
1097	SCR - B3F- cell A9		
1098	SCR - B3F- cell A10-A15		
1099	SCR - B3F- cell A16		
1100	SCR - B3F- cell B9		
1101	SCR - B3F- cell B10-B15		
1102	SCR - B3F- cell B16		
1103	SCR - B3F- cell C9		
1104	SCR - B3F- cell C10-C15		
1105	SCR - B3F- cell C16		
1106	SCR - B3F- cell A17		
1107	SCR - B3F- cell A18		
1108	SCR - B3F- cell B17		
1109	SCR - B3F- cell B18		
1110	SCR - B3F- cell C17		
1111	SCR - B3F- cell C18		
1112	SCR - B3F- cell A19		
1113	SCR - B3F- cell A20		
1114	SCR - B3F- cell A21		
1115	SCR - B3F- cell B19		
1116	SCR - B3F- cell B20		
1117	SCR - B3F- cell B21		
1118	SCR - B3F- cell C19		
1119	SCR - B3F- cell C20		
1120	SCR - B3F- cell C21		
1121	SCR - B3F- cell A22		
1122	SCR - B3F- cell A23-A25		
1123	SCR - B3F- cell A26		
1124	SCR - B3F- cell B22		
1125	SCR - B3F- cell B23-B25		
1126	SCR - B3F- cell B26		
1127	SCR - B3F- cell C22		
1128	SCR - B3F- cell C23-C25		
1129	SCR - B3F- cell C26		
1130	SCR - B3F- cell AA1-AA20		
1131	SCR - B3F- cell AA21		
1132	SCR - B3F- cell AA22-AA35		
1133	SCR - B3F- cell AA36		
1134	SCR - B3F- cell AA37		
1135	SCR - B3F- cell AB1-AB20		
1136	SCR - B3F- cell AB21		
1137	SCR - B3F- cell AB22-AB35		
1138	SCR - B3F- cell AB36		
1139	SCR - B3F- cell AB37		
1140	SCR - B3F- cell AC1-AC20		
1141	SCR - B3F- cell AC21		
1142	SCR - B3F- cell AD1-AD20		
1143	SCR - B3F- cell AD21		
1144	SCR - B3F- cell AE1-AE20		
1145	SCR - B3F- cell AF1-AF20		
1146	SCR - B3F- cell AF21		
1147	SCR - B3F- cell AF36		
1148	SCR - B3F- cell AF37		
1149	SCR - B3F- cell AF38		
1150	SCR - B3F- cell AF39		
1151	SCR - B3F- cell AG1-AG20		
1152	SCR - B3F- cell AG21		
1153	SCR - B3F- cell AG36		
1154	SCR - B3F- cell AG37		
1155	SCR - B3F- cell AH1-AH20		
1156	SCR - B3F- cell AH21		
1157	SCR - B3F- cell AH36		
1158	SCR - B3F- cell AH37		
1159	SCR - B3F- cell AI1-AI20		
1160	SCR - B3F- cell AI21		
1161	SCR - B3F- cell AI36		
1162	SCR - B3F- cell AI37		
1163	SCR - B3F- cell AI38		
1164	SCR - B3F- cell AI39		
1165	SCR - B3F- cell BA1-BA20		
1166	SCR - B3F- cell BA21		
1167	SCR - B3F- cell BA22-BA35		
1168	SCR - B3F- cell BA36		
1169	SCR - B3F- cell BA37		
1170	SCR - B3F- cell BB1-BB20		
1171	SCR - B3F- cell BB21		
1172	SCR - B3F- cell BB22-BB35		
1173	SCR - B3F- cell BB36		
1174	SCR - B3F- cell BB37		
1175	SCR - B3F- cell BC1-BC20		
1176	SCR - B3F- cell BC21		
1177	SCR - B3F- cell BD1-BD20		
1178	SCR - B3F- cell BD21		
1179	SCR - B3F- cell BE1-BE20		
1180	SCR - B3F- cell BE21		
1181	SCR - B3F- cell BE36		
1182	SCR - B3F- cell BE37		
1183	SCR - B3F- cell BE38		
1184	SCR - B3F- cell BE39		
1185	SCR - B3F- cell BF1-BF20		
1186	SCR - B3F- cell BF21		
1187	SCR - B3F- cell BF36		
1188	SCR - B3F- cell BF37		
1189	SCR - B3F- cell BG1-BG20		
1190	SCR - B3F- cell BG21		
1191	SCR - B3F- cell BG36		
1192	SCR - B3F- cell BG37		
1193	SCR - B3F- cell BH1-BH20		
1194	SCR - B3F- cell BH21		
1195	SCR - B3F- cell BH36		
1196	SCR - B3F- cell BH37		
1197	SCR - B3F- cell BH38		
1198	SCR - B3F- cell BH39		
1199	SCR - B3F- cell CA1-CA14		
1200	SCR - B3F- cell CA15		
1201	SCR - B3F- cell CA16-CA29		
1202	SCR - B3F- cell CA30		
1203	SCR - B3F- cell CA31		
1204	SCR - B3F- cell CB1-CB14		
1205	SCR - B3F- cell CB15		
1206	SCR - B3F- cell CB16-CB29		
1207	SCR - B3F- cell CB30		
1208	SCR - B3F- cell CB31		

	B	C	D
1209	SCR - B3F- cell CC1-CC14		
1210	SCR - B3F- cell CC15		
1211	SCR - B3F- cell CD1-CD14		
1212	SCR - B3F- cell CD15		
1213	SCR - B3F- cell CE1-CE14		
1214	SCR - B3F- cell CF1-CF14		
1215	SCR - B3F- cell CF15		
1216	SCR - B3F- cell CF30		
1217	SCR - B3F- cell CF31		
1218	SCR - B3F- cell CF32		
1219	SCR - B3F- cell CF33		
1220	SCR - B3F- cell CG1-CG14		
1221	SCR - B3F- cell CG15		
1222	SCR - B3F- cell CG30		
1223	SCR - B3F- cell CG31		
1224	SCR - B3F- cell CH1-CH14		
1225	SCR - B3F- cell CH15		
1226	SCR - B3F- cell CH30		
1227	SCR - B3F- cell CH31		
1228	SCR - B3F- cell CI1-CI14		
1229	SCR - B3F- cell CI15		
1230	SCR - B3F- cell CI30		
1231	SCR - B3F- cell CI31		
1232	SCR - B3F- cell CI32		
1233	SCR - B3F- cell CI33		
1234	SCR - B3F- cell DA1-DA9		
1235	SCR - B3F- cell DA10		
1236	SCR - B3F- cell DA11-DA24		
1237	SCR - B3F- cell DA25		
1238	SCR - B3F- cell DA26		
1239	SCR - B3F- cell DB1-DB9		
1240	SCR - B3F- cell DB10		
1241	SCR - B3F- cell DB11-DB24		
1242	SCR - B3F- cell DB25		
1243	SCR - B3F- cell DB26		
1244	SCR - B3F- cell DC1-DC9		
1245	SCR - B3F- cell DC10		
1246	SCR - B3F- cell DD1-DD9		
1247	SCR - B3F- cell DD10		
1248	SCR - B3F- cell DE1-DE9		
1249	SCR - B3F- cell DF1-DF9		
1250	SCR - B3F- cell DF10		
1251	SCR - B3F- cell DF25		
1252	SCR - B3F- cell DF26		
1253	SCR - B3F- cell DF27		
1254	SCR - B3F- cell DF28		
1255	SCR - B3F- cell DG1-DG9		
1256	SCR - B3F- cell DG10		
1257	SCR - B3F- cell DG25		
1258	SCR - B3F- cell DG26		
1259	SCR - B3F- cell DH1-DH9		
1260	SCR - B3F- cell DH10		
1261	SCR - B3F- cell DH25		
1262	SCR - B3F- cell DH26		
1263	SCR - B3F- cell DI1-DI9		
1264	SCR - B3F- cell DI10		
1265	SCR - B3F- cell DI25		
1266	SCR - B3F- cell DI26		
1267	SCR - B3F- cell DI27		
1268	SCR - B3F- cell DI28		
1269	SCR - B3F- cell EA1		
1270	SCR - B3F- cell EB1		
1271	SCR - B3F- cell EC1		
1272	SCR - B3F- cell ED1		
1273	SCR - B3F- cell EE1		
1274	SCR - B3F- cell EE2		
1275	SCR - B3F- cell EE3		
1276	SCR - B3F- cell EF1		
1277	SCR - B3F- cell EG1		
1278	SCR - B3F- cell EH1		
1279	SCR - B3F- cell EH2		
1280	SCR - B3F- cell EH3		
1281	SCR - B3F- cell FA1		
1282	SCR - B3F- cell FB1		
1283	SCR - B3F- cell FC1		
1284	SCR - B3F- cell FD1		
1285	SCR - B3F- cell FE1		
1286	SCR - B3F- cell GA1		
1287	SCR - B3F- cell GA2		
1288	SCR - B3F- cell GA3		
1289	SCR - B3F- cell GA4		
1290	SCR - B3F- cell GA5		
1291	SCR - B3F- cell GA6		
1292	SCR - B3F- cell HA1		
1293	SCR - B3F- cell HB1		
1294	SCR - B3F- cell HC1		
1295	SCR - B3F- cell HD1		
1296	SCR - B3F- cell HE1		
1297	SCR - B3F- cell HF1		
1298	SCR - B3F- cell HG1		
1299	SCR - B3F- cell HH1		
1300	SCR - B3F- cell HA2-HE2		
1301	SCR - B3F- cell HF2		
1302	SCR - B3F- cell HG2		
1303	SCR - B3F- cell HH2		
1304	SCR - B3F- cell HI2		
1305	SCR - B3F- cell HJ2		
1306	SCR - B3F- cell HA3		
1307	SCR - B3F- cell HB3		
1308	SCR - B3F- cell HC3		
1309	SCR - B3F- cell HA4		
1310	SCR - B3F- cell HB4		
1311	SCR - B3F- cell HC4		
1312	SCR - B3F- cell HA5		
1313	SCR - B3F- cell HB5		
1314	SCR - B3F- cell HC5		
1315	SCR - B3F- cell IA1-IB1		
1316	SCR - B3F- cell IC1		
1317	SCR - B3F- cell ID1		
1318	SCR - B3F- cell IE1		
1319	SCR - B3F- cell IF1		
1320	SCR - B3F- cell JA1		
1321	SCR - B3F- cell JA2		

	B	C	D
1322	SCR - B3F- cell JA3		
1323	SCR - B3F- cell JA4		
1324	SCR - B3F- cell KA1-KE1		
1325	SCR - B3F- cell KA2-KE2		
1326	SCR - B3F- cell KA3-KE3		
1327	SCR - B3F- cell KA4-KE4		
1328	SCR - B3F- cell KA5-KE5		
1329	SCR - B3F- cell KA6-KE6		
1330	SCR - B3F- cell KA7-KE7		
1331	SCR - B3F- cell KF1		
1332	SCR - B3F- cell KF4		
1333	SCR - B3F- cell KF5		
1334	SCR - B3F- cell KF6		
1335	SCR - B3F- cell KF7		
1336	SCR - B3F- cell KA8		
1337	SCR - B3F- cell KB8		
1338	SCR - B3F- cell KC8		
1339	SCR - B3F- cell KA9		
1340	SCR - B3F- cell KB9		
1341	SCR - B3F- cell KC9		
1342	SCR - B3F- cell KA10		
1343	SCR - B3F- cell KB10		
1344	SCR - B3F- cell KC10		
1345	SCR - B3F- cell LA1-LB1		
1346	SCR - B3F- cell LC1		
1347	SCR - B3F- cell LA2-LB2		
1348	SCR - B3F- cell LC2		
1349	SCR - B3F- cell LA3-LB3		
1350	SCR - B3F- cell LC3		
1351	SCR - B3F- cell LA4-LB4		
1352	SCR - B3F- cell LC4		
1353	SCR - B3F- cell LA5-LB5		
1354	SCR - B3F- cell LC5		
1355	SCR - B3F- cell LA6-LB6		
1356	SCR - B3F- cell LC6		
1357	SCR - B3F- cell LA7		
1358	SCR - B3F- cell LA8		
1359	SCR - B3F- cell LA9		
1360	SCR - B3F- cell LA10		
1361	SCR - B3F- cell LA11		
1362	SCR - B3F- cell LA12		
1363	SCR - B3F- cell LB12		
1364	SCR - B3F- cell LC12		
1365	SCR - B3F- cell LA13		
1366	SCR - B3F- cell LB13		
1367	SCR - B3F- cell LC13		
1368	SCR - B3F- cell LA14		
1369	SCR - B3F- cell LB14		
1370	SCR - B3F- cell LC14		
1371	SCR - B3F- cell MA1-ME1		
1372	SCR - B3F- cell MA2-ME2		
1373	SCR - B3F- cell MF2		
1374	SCR - B3F- cell MG2		
1375	SCR - B3F- cell MH2		
1376	SCR - B3F- cell MF3		
1377	SCR - B3F- cell MG3		
1378	SCR - B3F- cell MH3		
1379	SCR - B3F- cell MF4		
1380	SCR - B3F- cell MG4		
1381	SCR - B3F- cell MH4		
1382	SCR - B3F- cell NA1,NC1,NE1,NG1,N		
1383	SCR - B3F- cell NB1,ND1,NF1,NH1,N		
1384	SCR - B3F- cell NK1		
1385	SCR - B3F- cell NK32		
1386	SCR - B3F- cell NK33		
1387	SCR - B3F- cell NK34		
1388	SCR - B3F- cell NL1		
1389	SCR - B3F- cell NL32		
1390	SCR - B3F- cell NM1		
1391	SCR - B3F- cell NM32		
1392	SCR - B3F- cell NN1		
1393	SCR - B3F- cell NN32		
1394	SCR - B3F- cell NN33		
1395	SCR - B3F- cell NN34		
1396	SCR - B3F- cell OA1		
1397	SCR - B3F- cell OB1,OC1,OD1,OE1,O		
1398	SCR - B3F- cell OG1		
1399	SCR - B3F- cell OG21		
1400	SCR - B3F- cell OG22		
1401	SCR - B3F- cell OG23		
1402	SCR - B3F- cell OH1		
1403	SCR - B3F- cell OH21		
1404	SCR - B3F- cell OI1		
1405	SCR - B3F- cell OI21		
1406	SCR - B3F- cell OJ1		
1407	SCR - B3F- cell OJ21		
1408	SCR - B3F- cell OJ22		
1409	SCR - B3F- cell OJ23		
1410	SCR - B3F- cell PA21		
1411	SCR - B3F- cell PB21		
1412	SCR - B3F- cell PC1		
1413	SCR - B3F- cell PD1,PF1,PH1		
1414	SCR - B3F- cell PE1, PG1, PI1		
1415	SCR - B3F- cell PJ1		
1416	SCR - B3F- cell PJ21		
1417	SCR - B3F- cell PK21		
1418	SCR - B3F- cell PL21		
1419	SCR - B3F- cell PM21		
1420	**SCR - B3G – General Comments**		
1421	SCR - B3G- cell A30		
1422	SCR - B3G- cell A1		
1423	SCR - B3G- cell A2		
1424	SCR - B3G- cell A3		
1425	SCR - B3G- cell A4		
1426	SCR - B3G- cell A5		
1427	SCR - B3G- cell A6		
1428	SCR - B3G- cell A7		
1429	SCR - B3G- cell A8		
1430	SCR - B3G- cell A9		

	B	C	D
1431	SCR - B3G- cell A10		
1432	SCR - B3G- cell A11		
1433	SCR - B3G- cell A12		
1434	SCR - B3G- cell A13		
1435	SCR - B3G- cell A14		
1436	SCR - B3G- cell A15		
1437	SCR - B3G- cell A16		
1438	**MCR - B4A – Genera**	According to the tables in the appendices, the MCR templates are only to be completed on an annual basis. According to Guideline 15 (p1.52), the MCR templates are to be completed on a quarterly basis. There is an inconsistency which should be corrected.	
1439	MCR - B4A- cell A1		
1440	MCR - B4A- cell B2		
1441	MCR - B4A- cell C2		
1442	MCR - B4A- cell B3		
1443	MCR - B4A- cell C3		
1444	MCR - B4A- cell B4		
1445	MCR - B4A- cell C4		
1446	MCR - B4A- cell B5		
1447	MCR - B4A- cell C5		
1448	MCR - B4A- cell B6		
1449	MCR - B4A- cell C6		
1450	MCR - B4A- cell B7		
1451	MCR - B4A- cell C7		
1452	MCR - B4A- cell B8		
1453	MCR - B4A- cell C8		
1454	MCR - B4A- cell B9		
1455	MCR - B4A- cell C9		
1456	MCR - B4A- cell B10		
1457	MCR - B4A- cell C10		
1458	MCR - B4A- cell B11		
1459	MCR - B4A- cell C11		
1460	MCR - B4A- cell B12		
1461	MCR - B4A- cell C12		
1462	MCR - B4A- cell B13		
1463	MCR - B4A- cell C13		
1464	MCR - B4A- cell B14		
1465	MCR - B4A- cell C14		
1466	MCR - B4A- cell B15		
1467	MCR - B4A- cell C15		
1468	MCR - B4A- cell B16		
1469	MCR - B4A- cell C16		
1470	MCR - B4A- cell B17		
1471	MCR - B4A- cell C17		
1472	MCR - B4A- cell A18		
1473	MCR - B4A- cell B19		
1474	MCR - B4A- cell B20		
1475	MCR - B4A- cell B21		
1476	MCR - B4A- cell B22		
1477	MCR - B4A- cell C23		
1478	MCR - B4A- cell A24		
1479	MCR - B4A- cell A25		
1480	MCR - B4A- cell A26		
1481	MCR - B4A- cell A27		
1482	MCR - B4A- cell A28		
1483	MCR - B4A- cell A29		
1484	MCR - B4A- cell A30		
1485	**MCR - B4B – Genera**	According to the tables in the appendices, the MCR templates are only to be completed on an annual basis. According to Guideline 15 (p1.52), the MCR templates are to be completed on a quarterly basis. There is an inconsistency which should be corrected.	
1486	MCR - B4B- cell B1		
1487	MCR - B4B- cell C1		
1488	MCR - B4B- cell D2		
1489	MCR - B4B- cell E2		
1490	MCR - B4B- cell F2		
1491	MCR - B4B- cell G2		
1492	MCR - B4B- cell D3		
1493	MCR - B4B- cell E3		
1494	MCR - B4B- cell F3		
1495	MCR - B4B- cell G3		
1496	MCR - B4B- cell D4		
1497	MCR - B4B- cell E4		
1498	MCR - B4B- cell F4		
1499	MCR - B4B- cell G4		
1500	MCR - B4B- cell D5		
1501	MCR - B4B- cell E5		
1502	MCR - B4B- cell F5		
1503	MCR - B4B- cell G5		
1504	MCR - B4B- cell D6		
1505	MCR - B4B- cell E6		
1506	MCR - B4B- cell F6		
1507	MCR - B4B- cell G6		
1508	MCR - B4B- cell D7		
1509	MCR - B4B- cell E7		
1510	MCR - B4B- cell F7		
1511	MCR - B4B- cell G7		
1512	MCR - B4B- cell D8		
1513	MCR - B4B- cell E8		
1514	MCR - B4B- cell F8		
1515	MCR - B4B- cell G8		
1516	MCR - B4B- cell D9		
1517	MCR - B4B- cell E9		
1518	MCR - B4B- cell F9		
1519	MCR - B4B- cell G9		
1520	MCR - B4B- cell D10		
1521	MCR - B4B- cell E10		
1522	MCR - B4B- cell F10		
1523	MCR - B4B- cell G10		
1524	MCR - B4B- cell D11		
1525	MCR - B4B- cell E11		
1526	MCR - B4B- cell F11		
1527	MCR - B4B- cell G11		
1528	MCR - B4B- cell D12		
1529	MCR - B4B- cell E12		
1530	MCR - B4B- cell F12		
1531	MCR - B4B- cell G12		
1532	MCR - B4B- cell D13		
1533	MCR - B4B- cell E13		
1534	MCR - B4B- cell F13		
1535	MCR - B4B- cell G13		
1536	MCR - B4B- cell D14		
1537	MCR - B4B- cell E14		
1538	MCR - B4B- cell F14		
1539	MCR - B4B- cell G14		
1540	MCR - B4B- cell D15		
1541	MCR - B4B- cell E15		

	B	C	D
1542	MCR - B4B- cell F15		
1543	MCR - B4B- cell G15		
1544	MCR - B4B- cell D16		
1545	MCR - B4B- cell E16		
1546	MCR - B4B- cell F16		
1547	MCR - B4B- cell G16		
1548	MCR - B4B- cell D17		
1549	MCR - B4B- cell E17		
1550	MCR - B4B- cell F17		
1551	MCR - B4B- cell G17		
1552	MCR - B4B- cell B18		
1553	MCR - B4B- cell C18		
1554	MCR - B4B- cell D19		
1555	MCR - B4B- cell F19		
1556	MCR - B4B- cell D20		
1557	MCR - B4B- cell F20		
1558	MCR - B4B- cell D21		
1559	MCR - B4B- cell F21		
1560	MCR - B4B- cell D22		
1561	MCR - B4B- cell F22		
1562	MCR - B4B- cell E23		
1563	MCR - B4B- cell G23		
1564	MCR - B4B- cell A24		
1565	MCR - B4B- cell A25		
1566	MCR - B4B- cell A26		
1567	MCR - B4B- cell A27		
1568	MCR - B4B- cell A28		
1569	MCR - B4B- cell A29		
1570	MCR - B4B- cell A30		
1571	**G01-General Comments**		
1572	G01- cell A1		
1573	G01- cell B1		
1574	G01- cell C1		
1575	G01- cell D1	We note that the closed list for Type of Undertaking included in EIOPA's July 2012 Log did not include a category for non-insurance entities which are items 1 to 10 (i.e. Not insurance holding co's, Ancillary service co's, Other financial institutions, SPVs etc.) The instructions document no longer shows the list of values for type of undertaking, closed list options should address all possibilities for entities.	
1576	G01- cell E1		
1577	G01- cell F1	The instructions document no longer shows the list of values for category of undertaking.	
1578	G01- cell G1		
1579	G01- cell H1a		
1580	G01- cell H1b		
1581	G01- cell H1c		
1582	G01- cell I1a		
1583	G01- cell I1b		
1584	G01- cell J1	The instructions document no longer shows the list of values for category of undertaking.	
1585	G01- cell K1	The instructions document no longer shows the list of values for category of undertaking.	
1586	G01- cell L1	The instructions document no longer shows the list of values for category of undertaking.	
1587	G01- cell M1		
1588	G01- cell N1		
1589	G01- cell O1		
1590	G01- cell P1		
1591	G01- cell Q1		
1592	G01- cell R1		
1593	G01- cell S1		
1594	G01- cell T1		
1595	G01- cell U1		
1596	**G03 – General Comments**	Several cells in this template, for example cell F1, require free text information as input. This is difficult to include in a group template as this type of data is not easily aggregated. In general, background information and free text responses can be sourced from solo templates.	
1597	G03- cell A1		
1598	G03- cell A2		
1599	G03- cell B1	It should be noted that cells B1-B7 will not reconcile to the Group SCR as diversification would not be taken into account.	
1600	G03- cell B2	It should be noted that cells B1-B7 will not reconcile to the Group SCR as diversification would not be taken into account.	
1601	G03- cell B3	It should be noted that cells B1-B7 will not reconcile to the Group SCR as diversification would not be taken into account.	
1602	G03- cell B4	It should be noted that cells B1-B7 will not reconcile to the Group SCR as diversification would not be taken into account.	
1603	G03- cell B5	It should be noted that cells B1-B7 will not reconcile to the Group SCR as diversification would not be taken into account.	
1604	G03- cell B6	It should be noted that cells B1-B7 will not reconcile to the Group SCR as diversification would not be taken into account.	
1605	G03- cell B7	It should be noted that cells B1-B7 will not reconcile to the Group SCR as diversification would not be taken into account.	
1606	G03- cell C1		
1607	G03- cell D1		
1608	G03- cell F1		
1609	G03- cell G1		
1610	G03- cell H1		
1611	G03- cell N1		
1612	G03- cell O1		
1613	G03- cell P1		
1614	**G04 – General Comments**		
1615	G04- cell A1		
1616	G04- cell A2		
1617	G04- cell A3		
1618	G04- cell B1		
1619	G04- cell C1		
1620	G04- cell D1		
1621	G04- cell E1		
1622	**G14- General Comments**		
1623	G14- cell A1		
1624	G14- cell B1		
1625	G14- cell S1		
1626	G14- cell C1,F1,I1,L1,Q1		
1627	G14- cell D1,G1,J1,M1,P1		
1628	G14- cell E1,H1,K1,N1,Q1		
1629	G14- cell R1		
1630	**Technical Annex IV General Comments**		
1631	**Technical Annex V General Comments**		
1632	Technical Annex VI General Comments		
1633	**Technical Annex VII General Comments**		
1634	CAS1		
1635	CAS2		
1636	CAS3		

	B	C	D
1637	CAS4		
1638	CAS5		
1639	CAS6		
1640	CAS7		
1641	CAS8		
1642	CAS9		
1643	CAS10		
1644	CAS11		
1645	CAS12		
1646	CAS13		
1647	CAS14		
1648	CAS15		
1649	CAS16		
1650	CAS17		
1651	CAS18		
1652	CAS19		
1653	CAS20		
1654	CAS21		
1655	CAS22		
1656	CAS23		
1657	CAS24		
1658	CAS25		
1659	CAS26		
1660	CAS27		
1661	CAS28		
1662	CAS29		
1663	CAS30		
1664	CAS31		
1665	CAS32		
1666	CAS33		
1667	CAS34		
1668	CAS35		
1669	CAS36		
1670	CAS37		
1671	CAS38		
1672	CAS39		
1673	CAS40		
1674	CAS41		
1675	CAS42		
1676	CAS43		
1677	CAS44		
1678	CAS45		
1679	CAS46		
1680	CAS47		
1681	CAS48		
1682	CAS49		
1683	CAS50		
1684	CAS51		
1685	CAS52		
1686	CAS53		
1687	CAS54		
1688	CAS55		
1689	CAS56		
1690	CAS57		
1691	CAS58		
1692	CAS59		
1693	CAS60		
1694	CAS61		
1695	CAS62		
1696	CAS63		
1697	CAS64		
1698	CAS65		
1699	CAS66		
1700	CAS67		
1701	CAS68		
1702	CAS69		
1703	CAS70		
1704	CAS71		
1705	CAS72		
1706	CAS73		
1707	CAS74		
1708	CAS75		
1709	CAS76		
1710	CAS77		
1711	CAS78		
1712	COS1		
1713	COS2		
1714	COS3		
1715	COS4		
1716	COS5		
1717	COS6		
1718	COS7		
1719	COS8		
1720	COS9		
1721	COS10		
1722	COS11		
1723	COS12		
1724	COS13		
1725	COS14		
1726	COS15		
1727	COS16		
1728	COS17		
1729	COS18		
1730	COS19		
1731	COS20		
1732	COS21		
1733	COS22		
1734	COS23		
1735	COS24		
1736	COS25		
1737	COS26		
1738	COS27		
1739	COS28		
1740	COS29		
1741	COS30		
1742	COS31		
1743	COS32		
1744	COS33		
1745	COS34		
1746	COS35		
1747	COS36		
1748	COS37		
1749	COS38		

	B	C	D
1750	CQS39		
1751	CQS40		
1752	CQS41		
1753	CQS42		
1754	CQS43		
1755	CQS44		
1756	CQS45		
1757	CQS46		
1758	CQS47		
1759	CQS48		
1760	CQS49		
1761	CQS50		
1762	CQS51		
1763	CQS52		
1764	CQS53		
1765	CQS54		
1766	CQS55		
1767	CQS56		
1768	CQS57		
1769	CQS58		
1770	CQS59		
1771	CQS60		
1772	CQS61		
1773	CQS62		
1774	CQS63		
1775	CGS1		
1776	CGS2		
1777	CGS3		
1778	CGS4		
1779	CGS5		
1780	CGS6		
1781	CGS7		
1782	CGS8		
1783	CGS9		
1784	CGS10		
1785	CGS11		
1786	CGS12		
1787	CGS13		
1788	CGS14		
1789	CGS15		
1790	CGS16		
1791	CGS17		
1792	CGS18		
1793	CGS19		
1794	CGS20		
1795	CGS21		
1796	QCGS1		
1797	Instructions		
1798	**Impact Assessment – General Comments**		
1799	2.1		
1800	2.2		
1801	2.3		
1802	2.4		
1803	2.5		
1804	2.6		
1805	2.7		
1806	2.8		
1807	2.9		
1808	2.10		
1809	2.11		
1810	2.12		
1811	2.13		
1812	2.14		
1813	2.15		
1814	2.16		
1815	Question 1	As previously communicated to EIOPA in our letter dated 23 January 2012, we do not support additional reporting on a Solvency II Basis on an interim basis in advance of Solvency II requirements coming into force. It is, in our view, an unwelcome burden while firms still have to report on a Solvency I basis and will be in the process of seeking internal model approval. If National Competent Authorities (NCAs) wish to assess the preparedness of firms systems and processes to comply with Solvency II reporting requirements, then this can be achieved by review and inspection of firm's implementation activity. We consider it unnecessary to try and achieve this through the request for narrative reporting and a sub-set of quantitative reporting templates (QRT) templates; indeed it may act as a distraction from work to implement reporting of the remaining QRT templates, as focus will be on those templates required for interim reporting.	
1816	Question 1 – Option 1	We support this option	
1817	Question 1 – Option 2	We do not support this option but have given comments as part of this consultation should EIOPA pursue it.	
1818	Question 2	[While Option 4 as the least burdensome would be our preferred option of those listed, we do not support as required under this option the reporting of SCR-B3 templates by firms in the pre-application process for their internal models. Similarly we would also be supportive of Option 2 (excluding SCR-B3) as these would be the priority templates we would expect to be preparing as part of dry-run activity, and would help our Regulator to assess preparedness.]	
1819	Question 2 – Option 1	We do not support Option 1, as the additional financial stability templates, A1Q, IGT and RC templates would be unnecessarily burdensome.	
1820	Question 2 – Option 2	See answer to Question 2	
1821	Question 2 – Option 3	We do not support Option 3. The additional financial stability templates, A1Q, IGT and RC templates would be unnecessarily burdensome and do not provide useful additional information to assess preparedness.	
1822	Question 2 – Option 4	See answer to Question 2	
1823	Question 3	Our overall position, as noted in our general comments and cover note, is that we do not support additional Solvency II reporting on an interim basis in advance of Solvency II requirements coming into force. It is, in our view, an unwelcome burden while firms still have to report on a Solvency I basis and will be in the process of seeking internal model approval. If National Competent Authorities (NCAs) can assess the preparedness of firm's systems and processes by review and inspection of firm's implementation activity. We consider it unnecessary to try and achieve this through requesting additional narrative reporting and a sub-set of quantitative reporting templates (QRT) templates; indeed it may act as a distraction from work to implement reporting of the remaining QRT templates, as focus will be on those templates required for interim reporting. However should EIOPA still require interim reporting, we would prefer Option 3	
1824	Question 3 – Option 1	See response to Question3.	
1825	Question 3 – Option 2	See response to Question3.	
1826	Question 3 – Option 3	See response to Question3.	
1827	Question 4	We support Option 3, as enabling good coverage and consistent implementation across the EEA.	
1828	Question 4 – Option 1	See response to Question 4	

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1829	Question 4 – Option 2	See response to Question 4	
1830	Question 4 – Option 3	See response to Question 4	
1831	Question 4 – Option 4	See response to Question 4	
1832	Question 4 – Option 5	We do not support this option as it will lead to divergent application across the EEA, and for Groups operating throughout the EEA make it harder to implement.	
1833	Question 5	Our view is that we do not support the proposal to submit both internal model and standard formula forms (even at a local NCA level) by insurers if they are sufficiently progressed in their internal model approval process (IMAP). Building systems to capture data on both in the prescribed format, which must be submitted electronically, involves building reporting processes and submission templates that may not be required longer term. For firms in IMAP any standard formula data should be sourced through the IMAP application process, not through the submission of QRTs. We consider both options to be equally burdensome and potentially costly for limited future benefit. However, should EIOPA pursue this line of reporting, we would prefer Option 2, predicated on the basis expressed in paragraph 2.68 that this will form a single data request to support both the IM pre application process and interim reporting process.	
1834	Question 5 – Option 1	See response to Question 5	
1835	Question 5 – Option 2	See response to Question 5	
1836	Question 6	Our support for Option 3 is predicated on the fact that 1 year before Solvency II we would expect clarity from the European Commission on which 3rd country regimes will be considered equivalent or granted transitional recognition as equivalent. We do not wish to expend time and resource implement Solvency II capital and reporting rules in 3rd countries, which ultimately when Solvency 2 are implemented are considered equivalent.	
1837	Question 6 – Option 1	We do not support Option 1, as it would result in wasted time and resource in implementing and applying Solvency II accounting rules in respect of subsidiaries in 3rd country regimes, which are deemed equivalent when S2 becomes effective.	
1838	Question 6 – Option 2	We do not support Option 2, as this provides too much discretion to National Supervisors raising the risk inconsistent application of Equivalence across the EEA and that potentially we implement and apply Solvency II accounting rules in respect of subsidiaries in 3rd country regimes, which are deemed equivalent when S2 becomes effective.	
1839	Question 6 – Option 3	While we understand EIOPA's wish not to prejudice the European Commission's future deliberations on equivalence, it is crucial that 1 year before Solvency II implementation we have clarity on which 3rd country regimes are deemed equivalent to avoid unnecessary expenditure on implementation.	
1840	Question 6 – Option 4	We do not support this option as it will be burdensome to provide calculations on two separate bases, and an unnecessary if one of these bases is not used for Solvency 2 reporting depending on the final equivalence decision.	
1841	Question 7	We would favour Option 1. If the purpose of submitting information to NCAs in the interim period before Solvency 2 is effective is to help NCAs assess firms preparedness for S2 P3 reporting, then it would be most appropriate if firms prepared their submissions to Regulators on their best view of what ancillary own funds and USPs they expected to be approved. This should not in our view prejudice NCAs final decision on whether to approve these items or note. Indeed it will be of benefit to NCAs as it will help identify all ancillary own funds and USPs which firms are seeking approval.	
1842	Question 7 – Option 1	We support this option.	
1843	Question 7 – Option 2	See response to Question 7	
1844	Question 7 – Option 3	See response to Question 7	