

Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II		Deadline 31 July 2012 18:00 CET
Name of Company:	Pensionskasse Degussa VVaG – PKD (Pension Fund Degussa) Germany	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ Do not change the numbering in the column “reference”; if you change numbering, your comment cannot be processed by our IT tool ⇒ Leave the last column <u>empty</u>. ⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph or a cell, keep the row <u>empty</u>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <p>Please send the completed template, <u>in Word Format</u>, to CP-12-003@eiopa.europa.eu. Our IT tool does not allow processing of any other formats.</p> <p>The numbering of the paragraphs refers to Consultation Paper 12-003.</p>		
Reference	Comment	
General Comment	<p>The german Pension Fund Degussa (Pensionskasse Degussa VVaG – PKD, Reg.-No.: 2123) has 80,000 policies, 36,000 policyholders and 24,000 pensioners. It has been successful for more than 60 years and is regulated by the german federal financial supervisory agency (Bundesanstalt für Finanzdienstleistungsaufsicht – BaFin).</p> <p>The PKD is not in a position to comment on the technical specifications (according to a lack of time, a lack of staff capacity, and high costs).</p> <p>The PKD is concerned, to be unable to further continue its successful business by application of such new rules.</p>	

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	The PKD therefore rejects the Commissions’s plans on principle.	
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PRO.4.17.		