

<b>Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II</b>		<b>Deadline 31 July 2012 18:00 CET</b>
Name of Company:	Pensionskasse der Mitarbeiter der ehemaligen Frankona Rückversicherungs-AG V.V.a.G. Hamburg, Phone +49 89 3844 3504	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> <li>⇒ Do <b>not</b> change the numbering in the column "reference"; <b>if you change numbering, your comment cannot be processed by our IT tool</b></li> <li>⇒ Leave the last column <u>empty</u>.</li> <li>⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph or a cell, keep the row <u>empty</u>.</li> <li>⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below.</li> </ul> <p><b>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.</b></p> <p>The numbering of the paragraphs refers to Consultation Paper 12-003.</p>		
<b>Reference</b>	<b>Comment</b>	
General Comment	<p>The pension fund was established in 1961 and is operating for the employees of the sponsor company (Employer) only. There are 320 beneficiaries, which means, the pension fund is small, the policy reserve is below 50m€. The pension fund has no management. All admin work is done by people paid by the sponsor company. We do not have specific capacities to participate in a survey of the technical specifications laid down in CP-12-003, and we do not have know how in modelling . We expect that the IORP Directive is far too difficult for our business and does not fit to occupational pension funds. We see the risk that such a difficult and big rule book will challenge our business model and may result in discontinuing our successful business and the</p>	
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	business of the occupational pension funds in general. At least, concentration, higher cost and less competition will be the result. Therefore, we believe that the plan of the Commission is not at all helpful for our business. We recommend to dismiss the Commission's plan and the theory behind the plan – coming from Solvency II for professional insurance companies – strictly.	
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SCR.7.66.		
SCR.7.67.		

	<b>Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II</b>	<b>Deadline 31 July 2012 18:00 CET</b>
SCR.7.68.		
SCR.7.69.		
SCR.7.70.		
SCR.7.71.		
SCR.7.72.		
SCR.7.73.		
SCR.7.74.		
SCR.7.75.		
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SCR.7.78.		
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SCR.7.80.		
SCR.7.81.		
SCR.7.82.		
SCR.7.83.		
SCR.7.84.		
SCR.7.85.		
SCR.7.86.		
SCR.7.87.		
SCR.8.1.		
SCR.8.2.		
SCR.8.3.		
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SCR.8.6.		

	<b>Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II</b>	<b>Deadline 31 July 2012 18:00 CET</b>
SCR.8.7.		
SCR.9.1.		
SCR.9.2.		
SCR.9.3.		
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	<b>Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II</b>	<b>Deadline 31 July 2012 18:00 CET</b>
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SCR.9.29.		
SCR.9.30.		
SCR.9.31.		
SCR.9.32.		
SCR.9.33.		
SCR.9.34.		
SCR.10.1.		
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SCR.10.6.		
SCR.10.7.		
SCR.10.8.		
SCR.10.9.		
SCR.10.10.		
SCR.10.11.		
MCR.1.1.		
MCR.2.1.		
MCR.2.2.		
MCR.2.3.		
MCR.2.4.		
MCR.2.5.		

	<b>Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II</b>	<b>Deadline 31 July 2012 18:00 CET</b>
MCR.2.6.		
MCR.2.7.		
MCR.2.8.		
MCR.2.9.		
PRO.1.1.		
PRO.2.1.		
PRO.2.2.		
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PRO.2.4.		
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PRO.2.6.		
PRO.3.1.		
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PRO.3.14.		
PRO.3.15.		

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PRO.3.16.		
PRO.3.17.		
PRO.3.18.		
PRO.3.19.		
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PRO.3.21.		
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PRO.3.25.		
PRO.3.26.		
PRO.3.27.		
PRO.3.28.		
PRO.4.1.		
PRO.4.2.		
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PRO.4.14.		
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PRO.4.17.		