

<b>Comments Template on Impact Assessment and Questions</b>		<b>Deadline 20 January 2012 12:00 CET</b>
Name of Company:	AFA Sjukförsäkring, AFA Trygghetsförsäkring, AFA Livförsäkring	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public
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Reference	Comment	
General Comment	Overall, we find the reporting templates encompass information on a much too detailed level. It is important that the cost of providing the information is taken into account when specifying the reporting requirements and that focus is on the information absolutely needed for supervisory purposes. One suggestion could be to have less detailed reporting requirements for companies fulfilling SCR and MCR requirements. Companies not fulfilling SCR and MCR could instead be obliged to report more detailed data and on a continuous basis.	
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4.70.	Support option 1 : The undertakings should be free to maintain the standards they currently use internally whether this is based on accident year or underwriting year. If the reporting will not correspond to the business rules the undertaking have to reallocate data from one standard to the other only for reporting which will result in costs and perhaps risk the data quality.	
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