

**Comments Template on EIOPA-CP 11/010a and EIOPA-CP 11/010b
 Consultation Paper on the Proposal for Guidelines on Complaints-Handling by Insurance
 Undertakings and Draft Report on Best Practices by Insurance Undertakings in handling
 complaints**

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

Company name: ALLIANZ-TIRIAC ASIGURARI S.A., ROMANIA

Disclosure of comments: EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential.
*Please indicate if your comments on this CP should be treated as confidential, by deleting the word **Public** in the column to the right and by inserting the word **Confidential**.*

Public

Please follow the instructions for filling in the template:

- ⇒ Do **not** change the numbering in column "Reference", or any other formatting in the file.
- ⇒ Please fill in your comment in the relevant row. If you have **no comment** on a paragraph, keep the row **empty**. Please do not delete rows in the table.
- ⇒ Our IT tool does not allow processing of comments which do not refer to the specific paragraph numbers below.
 - If your comment refers to multiple paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other paragraphs this also applies.
 - If your comment refers to sub-bullets/sub-paragraphs, please indicate this in the comment relating to the corresponding paragraph.

Please send the completed template to CP-010@eiopa.europa.eu, in MS Word Format, (our IT tool does not allow processing of any other formats).

The paragraph numbers and questions below correspond to document no. EIOPA-CP-11/010a.
 There is an additional section at the end of the table for general comments on the draft Best Practices Report (document no. EIOPA-CP-11/010b).

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Reference	Comment
General Comment	
3.1.	
3.2.	
3.3.	
3.4.	
3.5.	
3.6.	
3.7.	The second sub-bullet: But also potential client or collaborator.
3.8.	
3.9.	
3.10.	The first sub-bullet: A "complaints management policy" is put in place by insurance undertakings. This policy should be defined by the complaint management process owner, who should also be responsible for its implementation and for monitoring compliance with it and endorsed by the insurance undertaking's senior management.
3.11.	
3.12.	
3.13.	
3.14.	
3.15.	
3.16.	
3.17.	Comments are not being sought on this paragraph at this stage
3.18.	Comments are not being sought on this paragraph at this stage
3.19	
Q1. – on Impact	Harmonization (alignment) of complaint management processes among Member States; a tendency

<p style="text-align: center;">Comments Template on EIOPA-CP 11/010a and EIOPA-CP 11/010b Consultation Paper on the Proposal for Guidelines on Complaints-Handling by Insurance Undertakings and Draft Report on Best Practices by Insurance Undertakings in handling complaints</p>		<p>Deadline 31 January 2012 12:00 CET</p>
Assessment	to have best practices; better services provided.	
Q2.– on Impact Assessment	Better understanding of the clients' needs; improvement of internal processes to ensure customer satisfaction.	
Q3.– on Impact Assessment	If a senior manager oversees the complaints handling process - Minimizing process efficiency. The process should be overseen and coordinated by the process owner.	
Q4.– on Impact Assessment	Introducing a senior management representative overseeing the complaints handling process; Minimizing process efficiency. The process should be overseen and coordinated by the process owner; Introduction of the registration system for complaints-handling: For the OE's that don't have a registration system – the material costs associated to developing a complaint management application; training the personnel; defining responsibilities and ownership of processes; centralizing processes (eg. Claims); defining work procedures; marketing costs. For the OE's that have a registration system in place: no costs.	
Best Practices Report Comments (EIOPA-CP-11/010b)		