

**Comments Template on  
Consultation Paper on EIOPA's first set of advice to the European  
Commission on specific items in the Solvency II Delegated Regulation**

**Deadline  
31 August 2017  
23:59 CET**

Name of Company:	Direct Line	
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"; if you change numbering, your comment cannot be processed by our IT tool</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 <a href="mailto:CP-17-004@eiopa.europa.eu">CP-17-004@eiopa.europa.eu</a></b></p> <p><b>Our IT tool does not allow processing of any other formats.</b></p> <p><b><u>The numbering of the reference refers to the sections</u></b> of the consultation paper on EIOPA's first set of advice to the European Commission on specific items in the Solvency II Delegated Regulation. Please indicate to which paragraph(s) your comment refers to.</p>		
<b>Reference</b>	<b>Comment</b>	
General Comment		
1		
2.1		
2.2		
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7.3	<p><b>Premium Risk non-life:</b> Standard formula considers the Volume measures of premium risk net of reinsurance and gross of commissions. If the commission is paid upfront, it doesn't generate future cashflow but it increases the Premium volume and accordingly the SCR (with no real risk attached).</p> <p><b>Proposal :</b> in case the commission is paid upfront ( no future cashflow) it can be deducted from the premium volume measure to represent a fair risk</p>	
7.4		
7.4.1		
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