

Comments Template on EIOPA-CP-14-044 Draft proposal for Level 3 Guidelines on methods for determining the market share for reporting		Deadline 02.Mar.2015 23:59 CET
Company name:	MetLife	
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: <ul style="list-style-type: none"> ⇒ <u>Do not change the numbering</u> in column "Reference". ⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph, keep the row <u>empty</u>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific paragraph numbers below. <ul style="list-style-type: none"> ○ 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 itself. <p>Please send the completed template to Consultation_Set2@eiopa.europa.eu, in MSWord Format, (our IT tool does not allow processing of any other formats).</p> <p>The paragraph numbers below correspond to Consultation Paper No. EIOPA-CP-14-044.</p>		
Reference	Comment	
General Comment	We believe that there should be consideration of or clarification on calculation of health insurance market share. The practicability of market share measures for life insurers should be further clarified in the context of negative technical provisions under Solvency II. The lead time to determine whether an insurer or a group falls into scope of reporting on account of	

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	its market share, must be clarified. We believe at least 12 months' would be appropriate.	
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1.13.	Guideline 2 - We believe EIOPA should consider excluding the pure unit-linked business, when assessing the market share as the underlying risk on such business lies with the policyholders.	
1.14.		
1.15.		
1.16.	Guideline 5 - This guideline should consider where a composite undertaking qualifies for a reporting exception for its life business, but will have to report on non-life business falling above the 20% threshold. We believe proportionality should apply to the undertaking as a whole rather than to the various components.	
1.17.		
1.18.	Guideline 6 – Given the deadline for third-year reporting under Solvency II is 16 weeks for solo and 22 weeks for group, it should be clarified what data will be used instead to assess market share.	
1.19.		
1.20.		

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Annex I - 1.1.		
Annex I - 1.2.		
Annex I - 1.3.		
Annex I - 1.4.		
Annex I - 1.5.		
Annex I - 1.6.		
Annex I - 1.7.		
Annex I - 1.8.		
Annex I - 1.9.		
Annex I - 1.10.		
Annex I - 1.11.		
Annex I - 1.12.		
Annex I - 1.13.		
Annex I - 1.14.		
Annex I - 1.15.		
Annex I - 1.16.		
Annex I - 1.17.		
Annex I - 1.18.		
Annex I - 1.19.		
Annex I - 1.20.		
Annex I - 1.21.		
Annex I - 1.22.		
Annex I - 1.23.		
Annex I - 1.24.		
Annex I - 1.25.		

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Annex I - 1.26.		
Annex I - 1.27.		
Annex I - 1.28.		
Annex I - 1.29.		
Annex I - 1.30.		
Annex I - 1.31.		
Annex I - 1.32.		
Annex I - 1.33.		
Annex I - 1.34.		
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Annex I - 1.36.		
Annex I - 1.37.		
Annex I - 1.38.		
Annex I - 1.39.		
Annex I - 1.40.		