

**Comments Template on
Draft proposal for Quantitative Reporting Templates**

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

| | | |
|-------------------------|---|---------------------|
| Name of Company: | If P&C | |
| Disclosure of comments: | Please indicate if your comments should be treated as confidential: | Confidential/Public |

Please follow the following instructions for filling in the template:

- ⇒ Do **not** change the numbering in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool
- ⇒ Leave the last column empty.
- ⇒ Please fill in your comment in the relevant row. If you have no comment on a paragraph or a cell, keep the row empty.
- ⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below.
 - Certain rows represent a group of cells with similar information (ex : TP - E3- cells A17-A31-J16 for a given triangle in TP-E3)
 - Cells that refer to formulas are not mentioned in specific rows; in case you have comments on formulas, please make them in the cell "general" for the given template
 - In spreadsheets & LOGs, certain cell number may seem like they are missing (ex : going directly from cell B1 to cell B3); this is normal, as they may refer to a previously existing cell that has been deleted during informal consultations, and cell numberings have not been changed for interal consistency purposes
 - If your comment refers to multiple cells or paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other cells or paragraphs this also applies.
 - If your comment refers to subparagraphs or specific cells within a group, please indicate this in the comment itself.

Please send the completed template, in Word Format, to

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cp009@eiopa.europa.eu. Our IT tool does not allow processing of any other formats.

The numbering of the paragraphs refers to this Consultation Paper, the numbering of cells refers to the accompanying spreadsheets and LOGs, the reference to "General", "Purpose", etc. refers to summary documents.

| Reference | Comment | |
|-----------------|---------|--|
| General Comment | | |
| 3.1 | | |
| 3.2 | | |
| 3.3 | | |
| 3.4 | | |
| 3.5 | | |
| 3.6 | | |
| 4.1 | | |
| 4.2 | | |
| 4.3 | | |
| 4.4 | | |
| 4.5 | | |
| 4.6 | | |
| 4.7 | | |
| 4.8 | | |

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|---|--|---|
| 4.9 | | |
| 4.10 | | |
| 4.11 | | |
| Technical Annex (only for inconsistencies) | | |
| BS-C1 – General | Regarding field A16 (Not found in the comment template.): Should cell A20 (Reinsurance receivables) really be included in the sum showed in this field? It is not in line with reinsurance report J3 cell N1 (Total reinsurance recoverables). | |
| BS-C1 – Purpose | | |
| BS-C1 – Benefits | | |
| BS-C1 – Costs | | |
| BS-C1 – Groups | | |
| BS-C1 – Materiality | | |
| BS-C1 - Disclosure | | |
| BS-C1 – Frequency | We see a need to report the Balance sheet on quarterly basis as it is needed to report the OF report. It also adds value to the data quality verification. | |
| BS-C1 – cell AS1 | | |
| BS-C1- cell AS24 | | |
| BS-C1- cell A2 | | |
| BS-C1- cell AS2 | | |
| BS-C1- cell A26 | | |
| BS-C1- cell AS26 | | |
| BS-C1- cell A25B | | |
| BS-C1- cell AS25B | | |
| BS-C1- cell A3 | | |

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| BS-C1- cell AS3 | | |
| BS-C1- cell A5 | | |
| BS-C1- cell AS5 | | |
| BS-C1- cell A6 | | |
| BS-C1- cell AS6 | | |
| BS-C1- cell A7 | No split should be made between listed and unlisted – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell AS7 | No split should be made between listed and unlisted – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell A7A | No split should be made between listed and unlisted – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell AS7A | No split should be made between listed and unlisted – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell A8 | No split should be made between government and corporate bonds – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell AS8 | No split should be made between government and corporate bonds – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell A8A | No split should be made between government and corporate bonds – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell AS8A | No split should be made between government and corporate bonds – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell A8C | | |
| BS-C1- cell AS8C | | |
| BS-C1- cell A8D | | |
| BS-C1- cell AS8D | | |
| BS-C1- cell AS9 | <p>Comment to A9A- A9F: This classification results in additional work because of the level of detail and it will not provide a transparent Balance Sheet from the reader's point of view.</p> <p>Does this need to be specified in the Balance Sheet? The information which is requested here will be gathered by calling/contacting each fund company where we have our holding in. Then the fund companies must estimate each fund which means that the figures will not be reliable during the</p> | |

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| | <p>reporting period. Correct amounts will be with one-quarter drop.</p> <p>Another issue which is very unclear with this reporting is how we should deal with the currency effects when for example we have a fund booked in EUR but the underlying instruments are in a couple of different currencies. How can you break down this fund into the underlying instruments in accounting? How should the currency issue be handled/reported?</p> <p>Should the remaining private equity commitments be reported here? If so, where should the corresponding liability to be reported? Earlier there was a row called uncalled investments in liabilities. Or should they be reported now under contingent liabilities?</p> | |
| BS-C1- cell AS9A | | |
| BS-C1- cell AS9B | | |
| BS-C1- cell AS9C | | |
| BS-C1- cell AS9D | | |
| BS-C1- cell AS9E | | |
| BS-C1- cell AS9F | | |
| BS-C1- cell A10A | | |
| BS-C1- cell AS10A | | |
| BS-C1- cell A10B | | |
| BS-C1- cell AS10B | | |
| | <p>A14 is Loans & mortgages (except loans on policies) in assets side. There is also the field AS14 (Other technical provisions) in the liability side – is this really correct? Shouldn't it be LS14 on liability side instead?</p> <p>Other technical provisions is to be disclosed only in statutory accounts value, it must cover e.g. equalisation provision/ reserve, mustn't it?</p> | |
| BS-C1- cell A14 | | |
| BS-C1- cell AS14 | | |
| BS-C1- cell A11 | | |
| BS-C1- cell AS11 | | |
| BS-C1- cell A12 | | |

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|-------------------|---|--|
| BS-C1- cell AS12 | | |
| BS-C1- cell A14A | | |
| BS-C1- cell AS14A | | |
| BS-C1- cell A17 | A17-A19A: Reinsurance recoverable should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell AS17 | Reinsurance recoverable should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell A18 | Reinsurance recoverable should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell AS18 | Reinsurance recoverable should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell A18A | Reinsurance recoverable should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell AS18A | Reinsurance recoverable should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell A19 | Reinsurance recoverable should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell AS19 | Reinsurance recoverable should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell A19A | Reinsurance recoverable should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell AS19A | | |
| BS-C1- cell A13 | | |
| BS-C1- cell AS13 | | |
| BS-C1- cell A21 | | |
| BS-C1- cell AS21 | | |
| BS-C1- cell A20 | | |
| BS-C1- cell AS20 | | |

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| BS-C1- cell A23 | | |
| BS-C1- cell AS23 | | |
| BS-C1- cell A27 | | |
| BS-C1- cell AS27 | | |
| BS-C1- cell A29 | | |
| BS-C1- cell AS29 | | |
| BS-C1- cell LS1 | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell L1A | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell L2 | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell L3 | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell LS4 | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell L4A | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell L5 | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell L6 | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell LS6B | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell L6C | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell L6D | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |

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| BS-C1- cell L6E | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell LS7 | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell L7A | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell L8 | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell L9 | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell LS10 | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell L10A | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell L11 | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell L12 | Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet. | |
| BS-C1- cell L23 | | |
| BS-C1- cell L18 | | |
| BS-C1- cell LS18 | | |
| BS-C1- cell L22 | | |
| BS-C1- cell LS22 | | |
| BS-C1- cell L13 | | |
| BS-C1- cell LS13 | | |
| BS-C1- cell L17 | | |
| BS-C1- cell LS17 | | |
| BS-C1- cell L16 | | |

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| BS-C1- cell LS16 | | |
| BS-C1- cell L19 | | |
| BS-C1- cell LS19 | | |
| BS-C1- cell L20 | | |
| BS-C1- cell LS20 | | |
| BS-C1- cell L15A | | |
| BS-C1- cell LS15A | | |
| BS-C1- cell L15B | | |
| BS-C1- cell LS15B | | |
| BS-C1- cell L15C | | |
| BS-C1- cell LS15C | | |
| BS-C1- cell L15D | | |
| BS-C1- cell LS15D | | |
| BS-C1- cell L25 | | |
| BS-C1- cell LS25 | | |
| BS-C1- cell L26 | | |
| BS-C1B – General | | |
| BS-C1B – Purpose | | |
| BS-C1B – Benefits | | |
| BS-C1B – Costs | | |
| BS-C1B – Groups | | |
| BS-C1B – Materiality | | |
| BS-C1B - Disclosure | | |
| BS-C1B – Frequency | | |

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| BS-C1B- cell A2 | | |
| BS-C1B- cell A3A | | |
| BS-C1B- cell A3C | | |
| BS-C1B- cell B3C | | |
| BS-C1B- cell C3C | | |
| BS-C1B- cell D3C | | |
| BS-C1B- cell A3B | | |
| BS-C1B- cell B3B | | |
| BS-C1B- cell A10 | | |
| BS-C1B- cell B10 | | |
| BS-C1B- cell A12A | | |
| BS-C1B- cell B12A | | |
| BS-C1B- cell A13 | | |
| BS-C1B- cell B13 | | |
| BS-C1B- cell A13A | | |
| BS-C1B- cell B13A | | |
| BS-C1B- cell A14 | | |
| BS-C1B- cell B14 | | |
| BS-C1B- cell A15A | | |
| BS-C1B- cell B15A | | |
| BS-C1B- cell A17 | | |
| BS-C1B- cell B17 | | |
| BS-C1B- cell A17A | | |
| BS-C1B- cell B17A | | |
| BS-C1B- cell A18 | | |
| BS-C1B- cell A5 | | |

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| BS-C1B- cell A9A | | |
| BS-C1B- cell A9B | | |
| BS-C1B- cell B9B | | |
| BS-C1B- cell C9B | | |
| BS-C1B- cell A19 | | |
| BS-C1B- cell B19 | | |
| BS-C1D – General | | |
| BS-C1D – Purpose | <p>It is said that this template aims at giving an overview of currency mismatches between assets and liabilities and of potential currency risks. If the undertaking has hedged currency risks with derivatives this template does not give a right picture. There should e.g. a row telling the amount of assets / liabilities that is hedged with derivatives / nominal value of derivatives.</p> <p>Proposed materiality threshold => template would have to be filled for all most important currencies representing up to 95% of both assets & liabilities (in SII value), along with any currency with a currency mismatch (difference between assets and liabilities) of more than 2 %. – Proposed materiality threshold up to 95 % sounds ok, if you have only a few (big) currencies, but can mean quite many currencies to report if there are several small currencies. Mismatch of more 2 %. As this is calculated separately on all different currencies and assets and liabilities, the reporting can end up to very small positions? E.g. assets of one foreign currency in EUR 4 million and liabilities in EUR 1 million, mismatch from assets EUR 4 million a lot more than 2 % and however, the position is immaterial. Should there be a limit like max X biggest? Derivates taken into account?</p> | |
| BS-C1D – Benefits | | |
| BS-C1D – Costs | | |
| BS-C1D – Groups | | |
| BS-C1D – Materiality | | |

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| BS-C1D - Disclosure | | |
| BS-C1D - Frequency | | |
| BS-C1D- cell A1 | | |
| BS-C1D- cell B1 | | |
| BS-C1D- cell C1 | | |
| BS-C1D- cell D1 | | |
| BS-C1D- cell E1 | | |
| BS-C1D- cell A3 | | |
| BS-C1D- cell A4 | | |
| BS-C1D- cell A5 | | |
| BS-C1D- cell A5A | | |
| BS-C1D- cell A6 | | |
| BS-C1D- cell A7 | | |
| BS-C1D- cell A8 | | |
| BS-C1D- cell A9 | | |
| BS-C1D- cell A10 | | |
| BS-C1D- cell A11 | | |
| BS-C1D- cell A12 | | |
| BS-C1D- cell A13 | | |
| BS-C1D- cell A14 | | |
| BS-C1D- cell A16 | | |
| Country - K1- General | In annex V the classes that should be used in K1 (Activity by country) is not the same as SII LoB. There should not be several different product aggregations in different reports. Suggestion: use SII LoB in K1. | |
| Country - K1- Purpose | | |
| Country - K1- Benefits | | |

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| Country - K1- Costs | | |
| Country - K1- Groups | | |
| Country - K1- Materiality | There should also be a threshold related to EEA-jurisdictions. Companies, whose FOS activities are immaterial (mainly serving local companies that have established foreign activities) haven't built their systems to deliver this kind of detailed information. | |
| Country - K1- Disclosure | | |
| Country - K1- Frequency | | |
| Country - K1- cell A1 | | |
| Country - K1- cell A2 | | |
| Country - K1- cell A3 | | |
| Country - K1- cell A4 | | |
| Country - K1- cell C1 | | |
| Country - K1- cell C2 | | |
| Country - K1- cell C3 | | |
| Country - K1- cell C4 | | |
| Country - K1- cell E1 | | |
| Country - K1- cell E2 | | |
| Country - K1- cell E3 | | |
| Country - K1- cell E4 | | |
| Country - K1- cell H1 | | |
| Country - K1- cell H2 | | |
| Country - K1- cell H3 | | |
| Country - K1- cell H1A | | |
| Country - K1- cell H2A | | |
| Country - K1- cell H3A | | |
| Cover - A1A & Q- General | As there is only a Balance Sheet in Solvency II, we assume that this information is based on the | |

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| | <p>financial accounts but LoB is as defined for SII purposes. This is an additional burden to compile for undertakings. Is it really needed as we have in the financial statements result by group of EU insurance classes that is quite similar to this?</p> <p>Couldn't find a proper cell for this comment: What is the definition of overhead expenses compared to administrative expenses? This kind of information doesn't exist in systems as it is not required according to accounting rules. All cost is allocated to activities stated above in the template.</p> <p>Furthermore the required allocation of cost differs from the one usually used. We do the bookkeeping based on accrual concept – not cash basis. Therefore our book keeping system does not keep track of expenses paid.</p> <p>Premiums, claims & cost for countries where risk is located could not be found in the GL. If this is going to be reported it has to be based on internal assumptions. Do such assumptions fulfil any supervisory purpose?</p> <p>There are premiums written, premiums earned and claims paid, but not claims incurred – so the template gives partial information? Should the premiums earned be left out as the premium earned is not included in template A1Q?</p> | |
| Cover - A1A & Q- Purpose | | |
| Cover - A1A & Q- Benefits | | |
| Cover - A1A & Q- Costs | | |
| Cover - A1A & Q- Groups | | |
| Cover - A1A & Q- Materiality | The threshold for data by country is really important for undertakings whose foreign activities are immaterial (mainly serving local companies that has established foreign activities) | |
| Cover - A1A & Q- Disclosure | | |
| Cover - A1A & Q- | | |

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| Frequency | | |
| Cover - A1A- cell A1 | | |
| Cover - A1A- cell A2 | | |
| Cover - A1A- cell A3 | | |
| Cover - A1A- cell A4 | | |
| Cover - A1A- cell A5 | | |
| Cover - A1A- cell A6 | | |
| Cover - A1A- cell A7 | | |
| Cover - A1A- cell A8 | | |
| Cover - A1A- cell A9 | | |
| Cover - A1A- cell A10 | | |
| Cover - A1A- cell A11 | | |
| Cover - A1A- cell A12 | | |
| Cover - A1A- cell A19 | | |
| Cover - A1A- cell A20 | | |
| Cover - A1A- cell A21 | | |
| Cover - A1A- cell A22 | | |
| Cover - A1A- cell A23 | | |
| Cover - A1A- cell B1 | | |
| Cover - A1A- cell B2 | | |
| Cover - A1A- cell C1 | | |
| Cover - A1A- cell A1A | | |
| Cover - A1A- cell B1A | | |
| Cover - A1A- cell C1A | | |
| Cover - A1A- cell E1 | | |
| Cover - A1A- cell F1 | | |

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| Cover - A1A- cell G1 | | |
| Cover - A1A- cell E1A | | |
| Cover - A1A- cell F1A | | |
| Cover - A1A- cell G1A | | |
| Cover - A1A- cell E1B | | |
| Cover - A1A- cell F1B | | |
| Cover - A1A- cell G1B | | |
| Cover - A1A- cell E1C | | |
| Cover - A1A- cell F1C | | |
| Cover - A1A- cell G1C | | |
| Cover - A1A- cell E1D | | |
| Cover - A1A- cell F1D | | |
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| Cover - A1A- cell E1E | | |
| Cover - A1A- cell F1E | | |
| Cover - A1A- cell G1E | | |
| Cover - A1A- cell I1 | | |
| Cover - A1A- cell I2 | | |
| Cover - A1A- cell I3 | | |
| Cover - A1A- cell I3A | | |
| Cover - A1A- cell I3B | | |
| Cover - A1A- cell I4 | | |
| Cover - A1A- cell I5 | | |
| Cover - A1A- cell I6 | | |
| Cover - A1A- cell I7 | | |
| Cover - A1A- cell I8 | | |

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| Cover - A1A- cell I9 | | |
| Cover - A1A- cell I10 | | |
| Cover - A1A- cell I11 | | |
| Cover - A1A- cell J1 | | |
| Cover - A1A- cell I11A | | |
| Cover - A1A- cell J1A | | |
| Cover - A1A- cell L1 | | |
| Cover - A1A- cell M1 | | |
| Cover - A1A- cell L1A | | |
| Cover - A1A- cell M1A | | |
| Cover - A1A- cell O1 | | |
| Cover - A1A- cell P1 | | |
| Cover - A1A- cell O1A | | |
| Cover - A1A- cell P1A | | |
| Cover - A1A- cell O1B | | |
| Cover - A1A- cell P1B | | |
| Cover - A1A- cell O1C | | |
| Cover - A1A- cell P1C | | |
| Cover - A1Q- cell A1 | | |
| Cover - A1Q- cell A2 | | |
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| Cover - A1Q- cell A5 | | |
| Cover - A1Q- cell A6 | | |
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| Cover - A1Q- cell A8 | | |

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| Cover - A1Q- cell A9 | | |
| Cover - A1Q- cell A10 | | |
| Cover - A1Q- cell A11 | | |
| Cover - A1Q- cell A12 | | |
| Cover - A1Q- cell A19 | | |
| Cover - A1Q- cell A20 | | |
| Cover - A1Q- cell A21 | | |
| Cover - A1Q- cell A22 | | |
| Cover - A1Q- cell A23 | | |
| Cover - A1Q- cell B1 | | |
| Cover - A1Q- cell B2 | | |
| Cover - A1Q- cell C1 | | |
| Cover - A1Q- cell E1 | | |
| Cover - A1Q- cell F1 | | |
| Cover - A1Q- cell G1 | | |
| Cover - A1Q- cell E1Z | | |
| Cover - A1Q- cell F1Z | | |
| Cover - A1Q- cell G1Z | | |
| Cover - A1Q- cell I1 | | |
| Cover - A1Q- cell I2 | | |
| Cover - A1Q- cell I3 | | |
| Cover - A1Q- cell I3A | | |
| Cover - A1Q- cell I3B | | |
| Cover - A1Q- cell I4 | | |
| Cover - A1Q- cell I5 | | |
| Cover - A1Q- cell I6 | | |

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|---|---|---|
| Cover - A1Q- cell I7 | | |
| Cover - A1Q- cell I8 | | |
| Cover - A1Q- cell I9 | | |
| Cover - A1Q- cell I10 | | |
| Cover - A1Q- cell I11 | | |
| Cover - A1Q- cell L1 | | |
| Cover - A1Q- cell M1 | | |
| Cover - A1Q- cell L1Z | | |
| Cover - A1Q- cell M1Z | | |
| OF - B1A & B1Q – General | <p>The eligibility judgements and the tiering should not be a part of the ordinary balance sheet process. If we are going to report Opening/closing balances per tier we need to book them in a GL to keep track of movements in the underlying item including any currency effects. This will be burdensome and does not add any value for supervisory purposes. (See example cell A102 – E105)</p> <p>We purpose to remove the yearly template as the quarterly template provides enough information to get an overview of an undertaking own funds position.</p> | |
| OF - B1A & B1Q – Purpose | | |
| OF - B1A & B1Q – Benefits | | |
| OF - B1A & B1Q – Costs | | |
| OF - B1A & B1Q – Groups | | |
| OF - B1A & B1Q – Materiality | | |
| OF - B1A & B1Q - Disclosure | | |
| OF - B1A & B1Q – Frequency | | |
| OF - B1A- cell C1A | | |
| OF - B1A- cell B5 | | |

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| OF - B1A- cell C5 | | |
| OF - B1A- cell D5 | | |
| OF - B1A- cell B6 | | |
| OF - B1A- cell B10 | | |
| OF - B1A- cell C10 | | |
| OF - B1A- cell D10 | | |
| OF - B1A- cell B11 | | |
| OF - B1A- cell C11 | | |
| OF - B1A- cell B14 | | |
| OF - B1A- cell C14 | | |
| OF - B1A- cell B17 | | |
| OF - B1A- cell C17 | | |
| OF - B1A- cell D17 | | |
| OF - B1A- cell B18 | | |
| OF - B1A- cell C18 | | |
| OF - B1A- cell D18 | | |
| OF - B1A- cell D14 | | |
| OF - B1A- cell D11 | | |
| OF - B1A- cell D15 | | |
| OF - B1A- cell B25 | | |
| OF - B1A- cell B30 | | |
| OF - B1A- cell B31 | | |
| OF - B1A- cell C33 | | |
| OF - B1A- cell C34 | | |
| OF - B1A- cell C35 | | |
| OF - B1A- cell D35 | | |

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|---|---|---|
| OF - B1A- cell C36 | | |
| OF - B1A- cell D36 | | |
| OF - B1A- cell C37 | | |
| OF - B1A- cell C38 | | |
| OF - B1A- cell D38 | | |
| OF - B1A- cell C39 | | |
| OF - B1A- cell C40 | | |
| OF - B1A- cell D40 | | |
| OF - B1A- cell C41 | | |
| OF - B1A- cell D41 | | |
| OF - B1A- cell C42 | | |
| OF - B1A- cell D42 | | |
| OF - B1A- cell A45 | | |
| OF - B1A- cell A45A | | |
| OF - B1A- cell A45B | | |
| OF - B1A- cell B60 | | |
| OF - B1A- cell C60 | | |
| OF - B1A- cell B61 | | |
| OF - B1A- cell C61 | | |
| OF - B1A- cell B62 | | |
| OF - B1A- cell C62 | | |
| OF - B1A- cell B64 | <p>This cell can consist of 1) Movements in underlying item, 2) Currency effects, or 3) Changes in eligibility. This way of reporting doesn't provide the supervisor information about what the change consists of.</p> <p>Tiering and Eligibility should be excluded so that the movement only consists of currency effects and changes in underlying items.</p> | |

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| | <p>Eligibility and tiering are solvency II processes that should be kept out of the balance sheet. Requirement like this forces us to have eligibility and tiering as part of the ordinary balance sheet process.</p> <p>We suggest that we only work with closing balances, i.e. the columns should be from left to right: 1) balance carried forward, 2) eligibility adjustments, 3) tier 1, 4) tier 2, 5) tier 3.</p> | |
| OF - B1A- cell C64 | <p>This cell can consist of 1) Movements in underlying item, 2) Currency effects, or 3) Changes in eligibility. This way of reporting doesn't provide the supervisor information about what the change consists of.</p> <p>Tiering and Eligibility should be excluded so that the movement only consists of currency effects and changes in underlying items.</p> <p>Eligibility and tiering are solvency II processes that should be kept out of the balance sheet. Requirement like this forces us to have eligibility and tiering as part of the ordinary balance sheet process.</p> <p>We suggest that we only work with closing balances, i.e. the columns should be from left to right: 1) balance carried forward, 2) eligibility adjustments, 3) tier 1, 4) tier 2, 5) tier 3.</p> | |
| OF - B1A- cell B65 | <p>This cell can consist of 1) Movements in underlying item, 2) Currency effects, or 3) Changes in eligibility. This way of reporting doesn't provide the supervisor information about what the change consists of.</p> <p>Tiering and Eligibility should be excluded so that the movement only consists of currency effects and changes in underlying items.</p> <p>Eligibility and tiering are solvency II processes that should be kept out of the balance sheet. Requirement like this forces us to have eligibility and tiering as part of the ordinary balance sheet process.</p> | |

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| | We suggest that we only work with closing balances, i.e. the columns should be from left to right: 1) balance carried forward, 2) eligibility adjustments, 3) tier 1, 4) tier 2, 5) tier 3. | |
| | <p>This cell can consist of 1) Movements in underlying item, 2) Currency effects, or 3) Changes in eligibility. This way of reporting doesn't provide the supervisor information about what the change consists of.</p> <p>Tiering and Eligibility should be excluded so that the movement only consists of currency effects and changes in underlying items.</p> <p>Eligibility and tiering are solvency II processes that should be kept out of the balance sheet. Requirement like this forces us to have eligibility and tiering as part of the ordinary balance sheet process.</p> <p>We suggest that we only work with closing balances, i.e. the columns should be from left to right: 1) balance carried forward, 2) eligibility adjustments, 3) tier 1, 4) tier 2, 5) tier 3.</p> | |
| OF - B1A- cell C65 | | |
| OF - B1A- cell B70 | | |
| OF - B1A- cell C70 | | |
| OF - B1A- cell B71 | | |
| OF - B1A- cell C71 | | |
| OF - B1A- cell B73 | | |
| OF - B1A- cell C73 | | |
| OF - B1A- cell D73 | | |
| OF - B1A- cell E73 | | |
| OF - B1A- cell F73 | | |
| OF - B1A- cell B74 | | |
| OF - B1A- cell C74 | | |
| OF - B1A- cell D74 | | |

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| OF - B1A- cell E74 | | |
| OF - B1A- cell F74 | | |
| OF - B1A- cell B75 | | |
| OF - B1A- cell C75 | | |
| OF - B1A- cell D75 | | |
| OF - B1A- cell E75 | | |
| OF - B1A- cell F75 | | |
| OF - B1A- cell A77.1 | | |
| OF - B1A- cell B77.1 | | |
| OF - B1A- cell C77.1 | | |
| OF - B1A- cell D77.1 | | |
| OF - B1A- cell E77.1 | | |
| OF - B1A- cell F77.1 | | |
| OF - B1A- cell G77.1 | | |
| OF - B1A- cell H77.1 | | |
| OF - B1A- cell I77.1 | | |
| OF - B1A- cell J77.1 | | |
| OF - B1A- cell K77.1 | | |
| OF - B1A- cell L77.1 | | |
| OF - B1A- cell M77.1 | | |
| OF - B1A- cell N77.1 | | |
| OF - B1A- cell A77.n | | |
| OF - B1A- cell B77.n | | |
| OF - B1A- cell C77.n | | |
| OF - B1A- cell D77.n | | |
| OF - B1A- cell E77.n | | |

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| OF - B1A- cell F77.n | | |
| OF - B1A- cell G77.n | | |
| OF - B1A- cell H77.n | | |
| OF - B1A- cell I77.n | | |
| OF - B1A- cell J77.n | | |
| OF - B1A- cell K77.n | | |
| OF - B1A- cell L77.n | | |
| OF - B1A- cell M77.n | | |
| OF - B1A- cell N77.n | | |
| OF - B1A- cell B79 | | |
| OF - B1A- cell C79 | | |
| OF - B1A- cell D79 | | |
| OF - B1A- cell E79 | | |
| OF - B1A- cell F79 | | |
| OF - B1A- cell B80 | | |
| OF - B1A- cell C80 | | |
| OF - B1A- cell D80 | | |
| OF - B1A- cell E80 | | |
| OF - B1A- cell F80 | | |
| OF - B1A- cell B81 | | |
| OF - B1A- cell C81 | | |
| OF - B1A- cell D81 | | |
| OF - B1A- cell E81 | | |
| OF - B1A- cell F81 | | |
| OF - B1A- cell B83 | This cell can consist of 1) Movements in underlying item, 2) Currency effects, or 3) Changes in eligibility. This way of reporting doesn't provide the supervisor information about what the | |

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| | <p>change consists of.</p> <p>Tiering and Eligibility should be excluded so that the movement only consists of currency effects and changes in underlying items.</p> <p>Eligibility and tiering are solvency II processes that should be kept out of the balance sheet. Requirement like this forces us to have eligibility and tiering as part of the ordinary balance sheet process.</p> <p>We suggest that we only work with closing balances, i.e. the columns should be from left to right: 1) balance carried forward, 2) eligibility adjustments, 3) tier 1, 4) tier 2, 5) tier 3.</p> | |
| OF - B1A- cell C83 | | |
| OF - B1A- cell D83 | | |
| | <p>This cell can consist of 1) Movements in underlying item, 2) Currency effects, or 3) Changes in eligibility. This way of reporting doesn't provide the supervisor information about what the change consists of.</p> <p>Tiering and Eligibility should be excluded so that the movement only consists of currency effects and changes in underlying items.</p> <p>Eligibility and tiering are solvency II processes that should be kept out of the balance sheet. Requirement like this forces us to have eligibility and tiering as part of the ordinary balance sheet process.</p> <p>We suggest that we only work with closing balances, i.e. the columns should be from left to right: 1) balance carried forward, 2) eligibility adjustments, 3) tier 1, 4) tier 2, 5) tier 3.</p> | |
| OF - B1A- cell B84 | | |
| OF - B1A- cell C84 | | |
| OF - B1A- cell D84 | | |
| OF - B1A- cell B85 | This cell can consist of 1) Movements in underlying item, 2) Currency effects, or 3) Changes in | |

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| | <p>eligibility. This way of reporting doesn't provide the supervisor information about what the change consists of.</p> <p>Tiering and Eligibility should be excluded so that the movement only consists of currency effects and changes in underlying items.</p> <p>Eligibility and tiering are solvency II processes that should be kept out of the balance sheet. Requirement like this forces us to have eligibility and tiering as part of the ordinary balance sheet process.</p> <p>We suggest that we only work with closing balances, i.e. the columns should be from left to right: 1) balance carried forward, 2) eligibility adjustments, 3) tier 1, 4) tier 2, 5) tier 3.</p> | |
| OF - B1A- cell C85 | | |
| OF - B1A- cell D85 | | |
| OF - B1A- cell A87.1 | | |
| OF - B1A- cell B87.1 | | |
| OF - B1A- cell C87.1 | | |
| OF - B1A- cell D87.1 | | |
| OF - B1A- cell E87.1 | | |
| OF - B1A- cell F87.1 | | |
| OF - B1A- cell G87.1 | | |
| OF - B1A- cell H87.1 | | |
| OF - B1A- cell I87.1 | | |
| OF - B1A- cell J87.1 | | |
| OF - B1A- cell K87.1 | | |
| OF - B1A- cell L87.1 | | |
| OF - B1A- cell M87.1 | | |

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| OF - B1A- cell N87.1 | | |
| OF - B1A- cell A87.n | | |
| OF - B1A- cell B87.n | | |
| OF - B1A- cell C87.n | | |
| OF - B1A- cell D87.n | | |
| OF - B1A- cell E87.n | | |
| OF - B1A- cell F87.n | | |
| OF - B1A- cell G87.n | | |
| OF - B1A- cell H87.n | | |
| OF - B1A- cell I87.n | | |
| OF - B1A- cell J87.n | | |
| OF - B1A- cell K87.n | | |
| OF - B1A- cell L87.n | | |
| OF - B1A- cell M87.n | | |
| OF - B1A- cell N87.n | | |
| OF - B1A- cell B88 | | |
| OF - B1A- cell C88 | | |
| OF - B1A- cell B89 | | |
| OF - B1A- cell B90 | | |
| OF - B1A- cell C90 | | |
| OF - B1A- cell B92 | | |
| OF - B1A- cell C92 | | |
| OF - B1A- cell D92 | | |
| OF - B1A- cell E92 | | |
| OF - B1A- cell F92 | | |
| OF - B1A- cell B93 | | |

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| OF - B1A- cell C93 | | |
| OF - B1A- cell D93 | | |
| OF - B1A- cell E93 | | |
| OF - B1A- cell F93 | | |
| OF - B1A- cell B94 | | |
| OF - B1A- cell C94 | | |
| OF - B1A- cell D94 | | |
| OF - B1A- cell E94 | | |
| OF - B1A- cell F94 | | |
| OF - B1A- cell B96 | Eligibility and tiering are solvency II processes that should be kept out of the balance sheet. Requirement like this forces us to have eligibility and tiering as part of the ordinary balance sheet process. | |
| OF - B1A- cell C96 | | |
| OF - B1A- cell D96 | | |
| OF - B1A- cell E96 | | |
| OF - B1A- cell B97 | | |
| OF - B1A- cell C97 | | |
| OF - B1A- cell D97 | | |
| OF - B1A- cell E97 | | |
| OF - B1A- cell B98 | | |
| OF - B1A- cell C98 | | |
| OF - B1A- cell D98 | | |
| OF - B1A- cell E98 | | |
| OF - B1A- cell A100.1 | | |
| OF - B1A- cell B100.1 | | |
| OF - B1A- cell C100.1 | | |

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|-----------------------|--|--|
| OF - B1A- cell D100.1 | | |
| OF - B1A- cell E100.1 | | |
| OF - B1A- cell F100.1 | | |
| OF - B1A- cell G100.1 | If the lenders of a subordinated loans are specified in E100.1-n what are the counterparties to be specified in G100.1-n? | |
| OF - B1A- cell H100.1 | | |
| OF - B1A- cell I100.1 | | |
| OF - B1A- cell J100.1 | | |
| OF - B1A- cell K100.1 | | |
| OF - B1A- cell L100.1 | | |
| OF - B1A- cell M100.1 | Is « Notice » the last point in time when the borrower of a subordinated loan is supposed to notify the lenders that it wants to pay back the loan on a call date? | |
| OF - B1A- cell N100.1 | | |
| OF - B1A- cell A100.n | | |
| OF - B1A- cell B100.n | | |
| OF - B1A- cell C100.n | | |
| OF - B1A- cell D100.n | | |
| OF - B1A- cell E100.n | | |
| OF - B1A- cell F100.n | | |
| OF - B1A- cell G100.n | | |
| OF - B1A- cell H100.n | | |
| OF - B1A- cell I100.n | | |
| OF - B1A- cell J100.n | | |
| OF - B1A- cell K100.n | | |
| OF - B1A- cell L100.n | | |
| OF - B1A- cell M100.n | | |

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|-----------------------|--|--|
| OF - B1A- cell N100.n | | |
| OF - B1A- cell B102 | Eligibility and tiering are solvency II processes that should be kept out of the balance sheet. Requirement like this forces us to have eligibility and tiering as part of the ordinary balance sheet process. | |
| OF - B1A- cell C102 | | |
| OF - B1A- cell D102 | | |
| OF - B1A- cell B103 | | |
| OF - B1A- cell C103 | | |
| OF - B1A- cell D103 | | |
| OF - B1A- cell B104 | | |
| OF - B1A- cell C104 | | |
| OF - B1A- cell D104 | | |
| OF - B1A- cell A106.1 | | |
| OF - B1A- cell B106.1 | | |
| OF - B1A- cell C106.1 | | |
| OF - B1A- cell D106.1 | | |
| OF - B1A- cell E106.1 | | |
| OF - B1A- cell F106.1 | | |
| OF - B1A- cell G106.1 | | |
| OF - B1A- cell H106.1 | | |
| OF - B1A- cell I106.1 | | |
| OF - B1A- cell J106.1 | | |
| OF - B1A- cell K106.1 | | |
| OF - B1A- cell L106.1 | | |
| OF - B1A- cell M106.1 | | |
| OF - B1A- cell N106.1 | | |

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| OF - B1A- cell A106.n | | |
| OF - B1A- cell B106.n | | |
| OF - B1A- cell C106.n | | |
| OF - B1A- cell D106.n | | |
| OF - B1A- cell E106.n | | |
| OF - B1A- cell F106.n | | |
| OF - B1A- cell G106.n | | |
| OF - B1A- cell H106.n | | |
| OF - B1A- cell I106.n | | |
| OF - B1A- cell J106.n | | |
| OF - B1A- cell K106.n | | |
| OF - B1A- cell L106.n | | |
| OF - B1A- cell M106.n | | |
| OF - B1A- cell N106.n | | |
| OF - B1A- cell A108 | | |
| OF - B1A- cell B108 | | |
| OF - B1A- cell C108 | | |
| OF - B1A- cell B109 | | |
| OF - B1A- cell D109 | | |
| OF - B1A- cell B110 | | |
| OF - B1A- cell C110 | | |
| OF - B1A- cell D110 | | |
| OF - B1A- cell E110 | | |
| OF - B1A- cell B111 | | |
| OF - B1A- cell C111 | | |
| OF - B1A- cell D111 | | |

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|-----------------------|--|--|
| OF - B1A- cell E111 | | |
| OF - B1A- cell A113.1 | | |
| OF - B1A- cell B113.1 | | |
| OF - B1A- cell C113.1 | | |
| OF - B1A- cell D113.1 | | |
| OF - B1A- cell E113.1 | | |
| OF - B1A- cell A113.n | | |
| OF - B1A- cell B113.n | | |
| OF - B1A- cell C113.n | | |
| OF - B1A- cell D113.n | | |
| OF - B1A- cell E113.n | | |
| OF - B1A- cell A115.1 | | |
| OF - B1A- cell B115.1 | | |
| OF - B1A- cell D115.1 | | |
| OF - B1A- cell E115.1 | | |
| OF - B1A- cell A115.n | | |
| OF - B1A- cell B115.n | | |
| OF - B1A- cell D115.n | | |
| OF - B1A- cell E115.n | | |
| OF - B1A- cell B116 | | |
| OF - B1A- cell D116 | | |
| OF - B1A- cell E116 | | |
| OF - B1A- cell F116 | | |
| OF - B1A- cell A130.1 | | |
| OF - B1A- cell B130.1 | | |
| OF - B1A- cell C130.1 | | |

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|-----------------------|--|--|
| OF - B1A- cell D130.1 | | |
| OF - B1A- cell E130.1 | | |
| OF - B1A- cell F130.1 | | |
| OF - B1A- cell G130.1 | | |
| OF - B1A- cell H130.1 | | |
| OF - B1A- cell I130.1 | | |
| OF - B1A- cell J130.1 | | |
| OF - B1A- cell K130.1 | | |
| OF - B1A- cell L130.1 | | |
| OF - B1A- cell M130.1 | | |
| OF - B1A- cell A130.n | | |
| OF - B1A- cell B130.n | | |
| OF - B1A- cell C130.n | | |
| OF - B1A- cell D130.n | | |
| OF - B1A- cell E130.n | | |
| OF - B1A- cell F130.n | | |
| OF - B1A- cell G130.n | | |
| OF - B1A- cell H130.n | | |
| OF - B1A- cell I130.n | | |
| OF - B1A- cell J130.n | | |
| OF - B1A- cell K130.n | | |
| OF - B1A- cell L130.n | | |
| OF - B1A- cell M130.n | | |
| OF - B1Q- cell C1A | | |
| OF - B1Q- cell B5 | | |
| OF - B1Q- cell C5 | | |

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| OF - B1Q- cell D5 | | |
| OF - B1Q- cell B6 | | |
| OF - B1Q- cell B10 | | |
| OF - B1Q- cell C10 | | |
| OF - B1Q- cell D10 | | |
| OF - B1Q- cell B11 | | |
| OF - B1Q- cell C11 | | |
| OF - B1Q- cell B14 | | |
| OF - B1Q- cell C14 | | |
| OF - B1Q- cell B17 | | |
| OF - B1Q- cell C17 | | |
| OF - B1Q- cell D17 | | |
| OF - B1Q- cell B18 | | |
| OF - B1Q- cell C18 | | |
| OF - B1Q- cell D18 | | |
| OF - B1Q- cell D14 | | |
| OF - B1Q- cell D11 | | |
| OF - B1Q- cell D15 | | |
| OF - B1Q- cell B25 | | |
| OF - B1Q- cell B30 | | |
| OF - B1Q- cell B31 | | |
| OF - B1Q- cell C33 | | |
| OF - B1Q- cell C34 | | |
| OF - B1Q- cell C35 | | |
| OF - B1Q- cell D35 | | |
| OF - B1Q- cell C36 | | |

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|---|---|---|
| OF - B1Q- cell D36 | | |
| OF - B1Q- cell C37 | | |
| OF - B1Q- cell C38 | | |
| OF - B1Q- cell D38 | | |
| OF - B1Q- cell C39 | | |
| OF - B1Q- cell C40 | | |
| OF - B1Q- cell D40 | | |
| OF - B1Q- cell C41 | | |
| OF - B1Q- cell D41 | | |
| OF - B1Q- cell C42 | | |
| OF - B1Q- cell D42 | | |
| OF - B1Q- cell A45 | | |
| OF - B1Q- cell A45A | | |
| OF - B1Q- cell A45B | | |
| VA - C2A- General | <p>The templates are still based on underwriting year, which is not available in existing reporting systems that are based on the accident year.</p> <p>For a non-life company there is no difference in risk whether insurance is underwritten in current or prior year. This is not a major risk driver why this split is unnecessary.</p> <p>The Analysis templates regarding cash flows are difficult to understand. What is information on cash-flows during the reporting period? We do not understand the rows? Difficult to say if it is possible or impossible to report them.</p> | |
| VA - C2A - Purpose | We see the purpose of specifying changes in OF that are due to SII adjustments – but most of the changes between IB and UB are related to changes that is shown in the legal P&L account and should not be reported here. | |
| VA - C2A - Benefits | It is difficult to see any benefits in double reporting, where additional reporting is just for the supervision, not used by the industry itself. The industry uses the statutory P&L to describe changes in equity. | |

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|---|---|---|
| VA – C2A - Costs | All reporting is currently done based on accident year. Developing reporting based on UW-year will mean extremely high cost. To maintain and run double reporting systems will also mean high additional costs. | |
| VA – C2A – Groups | | |
| VA - C2A – Materiality | | |
| VA - C2A – Disclosure | | |
| VA – C2A – Frequency | | |
| VA - C2B- General | | |
| VA – C2B – Purpose | This report will not fulfil the purpose. 1) Revenues (interests) in ordinary P&L are not cash flow based, 2) expenses related to investments are not cash flow based. | |
| VA – C2B – Benefits | | |
| VA – C2B - Costs | | |
| VA – C2B – Groups | | |
| VA - C2B – Materiality | | |
| VA - C2B – Disclosure | | |
| VA – C2B – Frequency | | |
| VA C2B - cell AA2 | | |
| VA C2B -cell A1 | | |
| VA C2B -cell A2 | | |
| VA C2B -cell A3 | | |
| VA C2B -cell A4 | | |
| VA C2B -cell A6 | What is the purpose of reporting of these changes in key figures? This approach will imply a multi million investment. We will need an additional general ledger – Solvency II ledger – to fulfil this reporting. This additional ledger requires a cash-based accounting, a total different approach from today’s accounting principles within the company. How should the reporting be done when company uses an average balance principle? We also see risks with the currency problems. | |
| VA C2B -cell A7 | Unclear about what should be reported here. | |

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|---|---|---|
| VA C2B -cell A8 | | |
| VA C2B -cell O1 | | |
| VA C2B -cell O2 | | |
| VA C2B -cell O3 | | |
| VA - C2C- General | <p>We are not and will not be able to report premiums, claims and expenses divided into UW year. It doesn't add any value to divide premiums and claims to the year then the risk was accepted. For non-life undertakings new business does not have higher risk than old business. The template is constructed for life undertakings.</p> <p>The combination of risk accepted and LoB for expenses will have to be based on assumptions that can not be checked and reconciled. What value would such reporting give for supervisory purposes?</p> | |
| VA - C2C - Purpose | If the report was filled as specified it will not fulfil its purposes as it will not reach the changed in OF as they are described in LOG document. E.g., cell E1 LOG: Should be change in best estimate of cash flows not best estimate of cachflow. | |
| VA - C2C - Benefits | | |
| VA - C2C - Costs | | |
| VA - C2C - Groups | | |
| VA - C2C - Materiality | | |
| VA - C2C - Disclosure | | |
| VA - C2C - Frequency | | |
| VA C2C -cell AA5 | | |
| VA C2C -cell A1 | | |
| VA C2C -cell B1 | | |
| VA C2C -cell C1 | Salvage and subrogation can not be separated. Include this in claims and benefits paid instead. | |
| VA C2C -cell D1 | Expenses paid should be "booked expenses" instead – to be in accordance with local accounting rules. | |

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| | | |
|------------------|--|--|
| VA C2C -cell E1 | | |
| VA C2C -cell E1A | | |
| VA C2C -cell G1 | Should be change in reinsurance and SPV recoverables as the actual payments could but doesn't have to effect own funds. | |
| VA C2C -cell H1 | | |
| VA C2C -cell E1A | | |
| VA C2C -cell A2 | | |
| VA C2C -cell B2 | | |
| VA C2C -cell D2 | | |
| VA C2C -cell E2 | | |
| VA C2C -cell G2 | | |
| VA C2C -cell A3 | | |
| VA C2C -cell B3 | | |
| VA C2C -cell C3 | | |
| VA C2C -cell A4 | | |
| VA C2C -cell B4 | | |
| VA C2C -cell C4 | Salvage and subrogation can not be separated. Include this in claims and benefits paid instead. | |
| VA C2C -cell D4 | Expenses paid should be "booked expenses" instead – to be in accordance with local accounting rules. | |
| VA C2C -cell E4 | | |
| VA C2C -cell E4A | | |
| VA C2C -cell G4 | Should be change in reinsurance and SPV recoverables as the actual payments could but doesn't have to effect own funds. | |
| VA C2C -cell H4 | | |
| VA C2C -cell BB1 | | |
| VA C2C -cell CC1 | | |

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| VA - C2D – General | | |
| VA - C2D – Purpose | | |
| VA - C2D – Benefits | | |
| VA - C2D - Costs | | |
| VA - C2D – Groups | | |
| VA - C2D – Materiality | | |
| VA - C2D – Disclosure | | |
| VA - C2D – Frequency | | |
| VA C2D -cell O2 | | |
| VA C2D -cell O3 | | |
| VA C2D -cell O4 | | |
| VA C2D -cell O6 | | |
| VA C2D -cell O7 | | |
| VA C2D -cell O8 | | |
| VA C2D -cell O9 | | |
| VA C2D -cell O10 | | |
| VA C2D -cell O11 | | |
| VA C2D -cell O12 | | |
| SCR - B2A – General | | |
| SCR - B2A – Purpose | | |
| SCR - B2A – Benefits | | |
| SCR - B2A – Costs | | |
| SCR - B2A – Groups | | |
| SCR - B2A – Materiality | | |

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|---|--|---|
| SCR - B2A - Disclosure | | |
| SCR - B2A - Frequency | | |
| SCR - B2A - cell A1 | This is a general comment on the colouring chart provided in the templates. The chart suggests that cyan fields are calculated with a formula, and green fields are calculated as total sum. Is this a calculation functionality provided by EIOPA similarly to QIS5, or something else? There are inconsistencies within what is now marked as calculated, compare e.g. SRC-B3C where diversification effect and total capital requirement are shown as calculated, and SRC-B3D where similar fields are not shown as calculated. | |
| SCR - B2A - cell B1 | | |
| SCR - B2A - cell A2 | | |
| SCR - B2A - cell B2 | | |
| SCR - B2A - cell A3 | | |
| SCR - B2A - cell B3 | | |
| SCR - B2A - cell A4 | | |
| SCR - B2A - cell B4 | | |
| SCR - B2A - cell A5 | | |
| SCR - B2A - cell B5=A5 | | |
| SCR - B2A - cell A6 | In a setup where undertaking is using PIM to calculate capital requirement for e.g. parts of market risks, is the diversification between SF modules still relevant? Or should the total diversification stemming from PIM and SF calculated parts be shown on A9, where the aggregation rules leading to diversification effect between SF calculated parts and PIM parts has been agreed with the supervisor. | |
| SCR - B2A - cell B6 | In a setup where undertaking is using PIM to calculate capital requirement for e.g. parts of market risks, is the diversification between SF modules still relevant? Or should the total diversification stemming from PIM and SF calculated parts be shown on A9, where the aggregation rules leading to diversification effect between SF calculated parts and PIM parts has been agreed with the supervisor. | |

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|---|---|---|
| SCR - B2A - cell A7 | | |
| SCR - B2A - cell B7=A7 | | |
| SCR - B2A - cell A8 | | |
| SCR - B2A - cell B8 | In a setup where undertaking is using PIM to calculate capital requirement for e.g. parts of market risks, is the diversification between SF modules still relevant? Or should the total diversification stemming from PIM and SF calculated parts be shown on A9, where the aggregation rules leading to diversification effect between SF calculated parts and PIM parts has been agreed with the supervisor. | |
| SCR - B2A - cell A9 | In a setup where undertaking is using PIM to calculate capital requirement for e.g. parts of market risks, is the diversification between SF modules still relevant? Or should the total diversification stemming from PIM and SF calculated parts be shown on A9, where the aggregation rules leading to diversification effect between SF calculated parts and PIM parts has been agreed with the supervisor. | |
| SCR - B2A - cell B9 | | |
| SCR - B2A - cell A11 | The log and the template both have different formulae, both inconsistent with the L2 (Oct 2011) text. Shouldn't it be $-\max(\min(B10-A10;FDB);0)$? | |
| SCR - B2A - cell A12 | | |
| SCR - B2A - cell A13 | | |
| SCR - B2A - cell A14 | | |
| SCR - B2A - cell A14A | | |
| SCR - B2A - cell A15A | | |
| SCR - B2A - cell A15B | | |
| SCR - B2A - cell A15C | | |
| SCR - B2A - cell A16 | | |
| SCR - B2A - cell A17 | | |
| SCR - B2A - cell A18 | | |
| SCR - B2A - cell A19 | | |

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| SCR - B2A - cell A20 | | |
| SCR - B2A - cell A21 | | |
| SCR - B2B - General | | |
| SCR - B2B - Purpose | | |
| SCR - B2B - Benefits | | |
| SCR - B2B - Costs | | |
| SCR - B2B - Groups | | |
| SCR - B2B - Materiality | | |
| SCR - B2B - Disclosure | | |
| SCR - B2B - Frequency | | |
| SCR - B2B- cell A1.1 | | |
| SCR - B2B- cell A1A.1 | | |
| SCR - B2B- cell B1.1 | | |
| SCR - B2B- cell A1.n | | |
| SCR - B2B- cell A1A.n | | |
| SCR - B2B- cell B1.n | | |
| SCR - B2B- cell B3 | | |
| SCR - B2B- cell B5 | | |
| SCR - B2B- cell B6 | | |
| SCR - B2B- cell B8 | | |
| SCR - B2C - General | | |
| SCR - B2C - Purpose | | |
| SCR - B2C - Benefits | | |

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|-------------------------|--|--|
| SCR - B2C – Costs | | |
| SCR - B2C – Groups | | |
| SCR - B2C – Materiality | | |
| SCR - B2C- Disclosure | | |
| SCR - B2C – Frequency | | |
| SCR - B2C- cell A1.1 | | |
| SCR - B2C- cell A1A.1 | | |
| SCR - B2C- cell B1.1 | | |
| SCR - B2C- cell A1.n | | |
| SCR - B2C- cell A1A.n | | |
| SCR - B2C- cell B1.n | | |
| SCR - B2C- cell B3 | | |
| SCR - B2C- cell B5 | | |
| SCR - B2C- cell B6 | | |
| SCR - B2C- cell B7 | | |
| SCR - B2C- cell B7A | | |
| SCR - B2C- cell B8A | | |
| SCR - B2C- cell B8B | | |
| SCR - B2C- cell B8C | | |
| SCR - B2C- cell B9 | | |
| SCR - B2C- cell B10 | | |
| SCR - B2C- cell B11 | | |
| SCR - B2C- cell B13 | | |
| SCR - B2C- cell B14 | | |
| SCR - B2C- cell B15 | | |

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| SCR - B3A – General | | |
| SCR - B3A – Purpose | | |
| SCR - B3A – Benefits | | |
| SCR - B3A – Costs | | |
| SCR - B3A – Groups | | |
| SCR - B3A – Materiality | | |
| SCR - B3A - Disclosure | | |
| SCR - B3A – Frequency | | |
| SCR - B3A- cell CO | | |
| SCR - B3A- cell D0 | | |
| SCR - B3A- cell A1 | | |
| SCR - B3A- cell A1A | | |
| SCR - B3A- cell B1 | | |
| SCR - B3A- cell B1A | | |
| SCR - B3A- cell C1 | | |
| SCR - B3A- cell B1B | | |
| SCR - B3A- cell D1 | | |
| SCR - B3A- cell A2 | | |
| SCR - B3A- cell A2A | | |
| SCR - B3A- cell B2 | | |
| SCR - B3A- cell B2A | | |
| SCR - B3A- cell C2 | | |
| SCR - B3A- cell B2B | | |
| SCR - B3A- cell D2 | | |

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| SCR - B3A- cell C3 | | |
| SCR - B3A- cell D3 | | |
| SCR - B3A- cell A4 | | |
| SCR - B3A- cell A4A | | |
| SCR - B3A- cell B4 | | |
| SCR - B3A- cell B4A | | |
| SCR - B3A- cell C4 | | |
| SCR - B3A- cell B4B | | |
| SCR - B3A- cell D4 | | |
| SCR - B3A- cell A5 | | |
| SCR - B3A- cell B5 | | |
| SCR - B3A- cell A6 | | |
| SCR - B3A- cell B6 | | |
| SCR - B3A- cell A7 | | |
| SCR - B3A- cell B7 | | |
| SCR - B3A- cell A8 | | |
| SCR - B3A- cell A8A | | |
| SCR - B3A- cell B8 | | |
| SCR - B3A- cell B8A | | |
| SCR - B3A- cell B8B | | |
| SCR - B3A- cell D8 | | |
| SCR - B3A- cell A9 | | |
| SCR - B3A- cell B9 | | |
| SCR - B3A- cell A10 | | |
| SCR - B3A- cell B10 | | |
| SCR - B3A- cell A11 | | |

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| SCR - B3A- cell B11 | | |
| SCR - B3A- cell A12 | | |
| SCR - B3A- cell A12A | | |
| SCR - B3A- cell B12 | | |
| SCR - B3A- cell B12A | | |
| SCR - B3A- cell C12 | | |
| SCR - B3A- cell B12B | | |
| SCR - B3A- cell D12 | | |
| SCR - B3A- cell C13 | | |
| SCR - B3A- cell D13 | | |
| SCR - B3A- cell A14 | | |
| SCR - B3A- cell A14A | | |
| SCR - B3A- cell B14 | | |
| SCR - B3A- cell B14A | | |
| SCR - B3A- cell C14 | | |
| SCR - B3A- cell B14B | | |
| SCR - B3A- cell D14 | | |
| SCR - B3A- cell C15 | | |
| SCR - B3A- cell D15 | | |
| SCR - B3A- cell A16 | | |
| SCR - B3A- cell A16A | | |
| SCR - B3A- cell B16 | | |
| SCR - B3A- cell B16A | | |
| SCR - B3A- cell C16 | | |
| SCR - B3A- cell B16B | | |
| SCR - B3A- cell D16 | | |

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| SCR - B3A- cell A17 | | |
| SCR - B3A- cell A17A | | |
| SCR - B3A- cell B17 | | |
| SCR - B3A- cell B17A | | |
| SCR - B3A- cell C17 | | |
| SCR - B3A- cell B17B | | |
| SCR - B3A- cell D17 | | |
| SCR - B3A- cell A18 | | |
| SCR - B3A- cell A18A | | |
| SCR - B3A- cell B18 | | |
| SCR - B3A- cell B18A | | |
| SCR - B3A- cell C18 | | |
| SCR - B3A- cell B18B | | |
| SCR - B3A- cell D18 | | |
| SCR - B3A- cell A19 | | |
| SCR - B3A- cell A19A | | |
| SCR - B3A- cell C19 | | |
| SCR - B3A- cell D19 | | |
| SCR - B3A- cell A20 | | |
| SCR - B3A- cell A20A | | |
| SCR - B3A- cell C20 | | |
| SCR - B3A- cell D20 | | |
| SCR - B3A- cell A21 | | |
| SCR - B3A- cell A21A | | |
| SCR - B3A- cell B21 | | |
| SCR - B3A- cell B21A | | |

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|-------------------------|--|--|
| SCR - B3A- cell C21 | | |
| SCR - B3A- cell B21B | | |
| SCR - B3A- cell D21 | | |
| SCR - B3A- cell C22 | | |
| SCR - B3A- cell D22 | | |
| SCR - B3A- cell C23 | | |
| SCR - B3A- cell D23 | | |
| SCR - B3B - General | | |
| SCR - B3B - Purpose | | |
| SCR - B3B - Benefits | | |
| SCR - B3B - Costs | | |
| SCR - B3B - Groups | | |
| SCR - B3B - Materiality | | |
| SCR - B3B - Disclosure | | |
| SCR - B3B - Frequency | | |
| SCR - B3B- cell A0 | | |
| SCR - B3B- cell B0 | | |
| SCR - B3B- cell A1 | | |
| SCR - B3B- cell A1A | | |
| SCR - B3B- cell A2 | | |
| SCR - B3B- cell A3 | | |
| SCR - B3B- cell A4 | | |
| SCR - B3B- cell B6 | | |
| SCR - B3B- cell A7 | | |

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|-------------------------|--|--|
| SCR - B3B- cell A8 | | |
| SCR - B3B- cell A9 | | |
| SCR - B3B- cell B9 | | |
| SCR - B3C - General | | |
| SCR - B3C - Purpose | | |
| SCR - B3C - Benefits | | |
| SCR - B3C - Costs | | |
| SCR - B3C - Groups | | |
| SCR - B3C - Materiality | | |
| SCR - B3C - Disclosure | | |
| SCR - B3C - Frequency | | |
| SCR - B3C- cell A1 | | |
| SCR - B3C- cell A1A | | |
| SCR - B3C- cell B1 | | |
| SCR - B3C- cell B1A | | |
| SCR - B3C- cell C1 | | |
| SCR - B3C- cell B1B | | |
| SCR - B3C- cell D1 | | |
| SCR - B3C- cell A2 | | |
| SCR - B3C- cell A2A | | |
| SCR - B3C- cell B2 | | |
| SCR - B3C- cell B2A | | |
| SCR - B3C- cell C2 | | |
| SCR - B3C- cell B2B | | |

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| SCR - B3C- cell D2 | | |
| SCR - B3C- cell A3 | | |
| SCR - B3C- cell A3A | | |
| SCR - B3C- cell B3 | | |
| SCR - B3C- cell B3A | | |
| SCR - B3C- cell C3 | | |
| SCR - B3C- cell B3B | | |
| SCR - B3C- cell D3 | | |
| SCR - B3C- cell C04 | | |
| SCR - B3C- cell D04 | | |
| SCR - B3C- cell A4 | | |
| SCR - B3C- cell A4A | | |
| SCR - B3C- cell B4 | | |
| SCR - B3C- cell B4A | | |
| SCR - B3C- cell C4 | | |
| SCR - B3C- cell B4B | | |
| SCR - B3C- cell D4 | | |
| SCR - B3C- cell A5 | | |
| SCR - B3C- cell A5A | | |
| SCR - B3C- cell B5 | | |
| SCR - B3C- cell B5A | | |
| SCR - B3C- cell C5 | | |
| SCR - B3C- cell B5B | | |
| SCR - B3C- cell D5 | | |
| SCR - B3C- cell A6 | | |
| SCR - B3C- cell A6A | | |

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|---------------------|--|--|
| SCR - B3C- cell B6 | | |
| SCR - B3C- cell B6A | | |
| SCR - B3C- cell C6 | | |
| SCR - B3C- cell B6B | | |
| SCR - B3C- cell D6 | | |
| SCR - B3C- cell A7 | | |
| SCR - B3C- cell A7A | | |
| SCR - B3C- cell B7 | | |
| SCR - B3C- cell B7A | | |
| SCR - B3C- cell C7 | | |
| SCR - B3C- cell B7B | | |
| SCR - B3C- cell D7 | | |
| SCR - B3C- cell A8 | | |
| SCR - B3C- cell A8A | | |
| SCR - B3C- cell B8 | | |
| SCR - B3C- cell B8A | | |
| SCR - B3C- cell C8 | | |
| SCR - B3C- cell B8B | | |
| SCR - B3C- cell D8 | | |
| SCR - B3C- cell A9 | | |
| SCR - B3C- cell A9A | | |
| SCR - B3C- cell B9 | | |
| SCR - B3C- cell B9A | | |
| SCR - B3C- cell C9 | | |
| SCR - B3C- cell B9B | | |
| SCR - B3C- cell D9 | | |

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|---|--|---|
| SCR - B3C- cell C10 | | |
| SCR - B3C- cell D10 | | |
| SCR - B3C- cell C11 | | |
| SCR - B3C- cell D11 | | |
| SCR - B3C- cell A12 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3D - General | | |
| SCR - B3D - Purpose | | |
| SCR - B3D - Benefits | | |
| SCR - B3D - Costs | | |
| SCR - B3D - Groups | | |
| SCR - B3D - Materiality | | |
| SCR - B3D - Disclosure | | |
| SCR - B3D - Frequency | | |
| SCR - B3D- cell A12 | | |
| SCR - B3D- cell A12A | | |
| SCR - B3D- cell B12 | | |
| SCR - B3D- cell C12 | | |
| SCR - B3D- cell D12 | | |
| SCR - B3D- cell E12 | | |
| SCR - B3D- cell F12 | | |
| SCR - B3D- cell A13 | | |
| SCR - B3D- cell A13A | | |

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| SCR - B3D- cell B13 | | |
| SCR - B3D- cell C13 | | |
| SCR - B3D- cell D13 | | |
| SCR - B3D- cell E13 | | |
| SCR - B3D- cell F13 | | |
| SCR - B3D- cell A14 | | |
| SCR - B3D- cell A14A | | |
| SCR - B3D- cell B14 | | |
| SCR - B3D- cell C14 | | |
| SCR - B3D- cell D14 | | |
| SCR - B3D- cell E14 | | |
| SCR - B3D- cell F14 | | |
| SCR - B3D- cell A15 | | |
| SCR - B3D- cell A15A | | |
| SCR - B3D- cell B15 | | |
| SCR - B3D- cell C15 | | |
| SCR - B3D- cell D15 | | |
| SCR - B3D- cell E15 | | |
| SCR - B3D- cell F15 | | |
| SCR - B3D- cell A16 | | |
| SCR - B3D- cell A17 | | |
| SCR - B3D- cell A18 | | |
| SCR - B3D- cell A18A | | |
| SCR - B3D- cell B18 | | |
| SCR - B3D- cell B18A | | |
| SCR - B3D- cell C18 | | |

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| SCR - B3D- cell A19 | | |
| SCR - B3D- cell A20 | | |
| SCR - B3D- cell A21 | | |
| SCR - B3D- cell A22 | | |
| SCR - B3D- cell A23 | | |
| SCR - B3D- cell A24 | | |
| SCR - B3D- cell A25 | | |
| SCR - B3D- cell A26 | | |
| SCR - B3D- cell A27 | | |
| SCR - B3E – General | | |
| SCR - B3E – Purpose | | |
| SCR - B3E – Benefits | | |
| SCR - B3E – Costs | | |
| SCR - B3E – Groups | | |
| SCR - B3E – Materiality | | |
| SCR - B3E - Disclosure | | |
| SCR - B3E – Frequency | | |
| SCR - B3E- cell A1 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell A1A | | |
| SCR - B3E- cell B1 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell C1 | | |

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| SCR - B3E- cell D1 | | |
| SCR - B3E- cell E1 | | |
| SCR - B3E- cell F1 | | |
| SCR - B3E- cell A2 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell A2A | | |
| SCR - B3E- cell B2 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell C2 | | |
| SCR - B3E- cell D2 | | |
| SCR - B3E- cell E2 | | |
| SCR - B3E- cell F2 | | |
| SCR - B3E- cell A3 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell A3A | | |
| SCR - B3E- cell B3 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell C3 | | |
| SCR - B3E- cell D3 | | |
| SCR - B3E- cell E3 | | |
| SCR - B3E- cell F3 | | |
| SCR - B3E- cell A4 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |

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| SCR - B3E- cell A4A | | |
| SCR - B3E- cell B4 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell C4 | | |
| SCR - B3E- cell D4 | | |
| SCR - B3E- cell E4 | | |
| SCR - B3E- cell F4 | | |
| SCR - B3E- cell A5 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell A5A | | |
| SCR - B3E- cell B5 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell C5 | | |
| SCR - B3E- cell D5 | | |
| SCR - B3E- cell E5 | | |
| SCR - B3E- cell F5 | | |
| SCR - B3E- cell A6 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell A6A | | |
| SCR - B3E- cell B6 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell C6 | | |
| SCR - B3E- cell D6 | | |

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| SCR - B3E- cell E6 | | |
| SCR - B3E- cell F6 | | |
| SCR - B3E- cell A7 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell A7A | | |
| SCR - B3E- cell B7 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell C7 | | |
| SCR - B3E- cell D7 | | |
| SCR - B3E- cell E7 | | |
| SCR - B3E- cell F7 | | |
| SCR - B3E- cell A8 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell A8A | | |
| SCR - B3E- cell B8 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell C8 | | |
| SCR - B3E- cell D8 | | |
| SCR - B3E- cell E8 | | |
| SCR - B3E- cell F8 | | |
| SCR - B3E- cell A9 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell A9A | | |

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| SCR - B3E- cell B9 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell C9 | | |
| SCR - B3E- cell D9 | | |
| SCR - B3E- cell E9 | | |
| SCR - B3E- cell F9 | | |
| SCR - B3E- cell A10 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell A10A | | |
| SCR - B3E- cell B10 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell C10 | | |
| SCR - B3E- cell D10 | | |
| SCR - B3E- cell E10 | | |
| SCR - B3E- cell F10 | | |
| SCR - B3E- cell A11 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell A11A | | |
| SCR - B3E- cell B11 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell C11 | | |
| SCR - B3E- cell D11 | | |
| SCR - B3E- cell E11 | | |

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| SCR - B3E- cell F11 | | |
| SCR - B3E- cell A12 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell A12A | | |
| SCR - B3E- cell B12 | The log document states that this needs to be filled only if the factor use is truly undertaking specific, and not if it is the one proposed in the SF. For practical purposes, should one always fill the field, even if the parameter use is equal to the one proposed in the L2 text. | |
| SCR - B3E- cell C12 | | |
| SCR - B3E- cell D12 | | |
| SCR - B3E- cell E12 | | |
| SCR - B3E- cell F12 | | |
| SCR - B3E- cell A13 | | |
| SCR - B3E- cell A14 | | |
| SCR - B3E- cell A15 | | |
| SCR - B3E- cell A15A | | |
| SCR - B3E- cell B15 | | |
| SCR - B3E- cell B15A | | |
| SCR - B3E- cell C15 | | |
| SCR - B3E- cell A16 | | |
| SCR - B3E- cell A17 | | |
| SCR - B3E- cell A18 | | |
| SCR - B3F - General | | |
| SCR - B3F - Purpose | | |
| SCR - B3F - Benefits | | |
| SCR - B3F - Costs | | |

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|---|---|---|
| SCR - B3F – Groups | | |
| SCR - B3F – Materiality | | |
| SCR - B3F - Disclosure | | |
| SCR - B3F – Frequency | | |
| SCR - B3F- cell Summary A1 | | |
| SCR - B3F- cell Summary C1 | | |
| SCR - B3F- cell Summary A9 | | |
| SCR - B3F- cell Summary C9 | | |
| SCR - B3F- cell Summary A17 | | |
| SCR - B3F- cell Summary C17 | | |
| SCR - B3F- cell Summary A26 | | |
| SCR - B3F- cell Summary C26 | | |
| SCR - B3F- cell Summary A27 | | |
| SCR - B3F- cell Summary C27 | | |
| SCR - B3F- cell Windstorm A1 | The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country (ies)? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20? | |
| SCR - B3F- cell Windstorm | | |

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| B1 | | |
| SCR - B3F- cell Windstorm C1 | | |
| SCR - B3F- cell Windstorm E1 | | |
| SCR - B3F- cell Windstorm F1 | | |
| SCR - B3F- cell Windstorm G1 | | |
| SCR - B3F- cell Windstorm H1 | | |
| SCR - B3F- cell Windstorm A2 | The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country (ies)? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20? | |
| SCR - B3F- cell Windstorm B2 | | |
| SCR - B3F- cell Windstorm C2 | | |
| SCR - B3F- cell Windstorm E2 | | |
| SCR - B3F- cell Windstorm F2 | | |
| SCR - B3F- cell Windstorm G2 | | |
| SCR - B3F- cell Windstorm H2 | | |
| SCR - B3F- cell Windstorm A3 | The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country (ies)? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow | |

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| | in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20? | |
| SCR - B3F- cell Windstorm B3 | | |
| SCR - B3F- cell Windstorm C3 | | |
| SCR - B3F- cell Windstorm E3 | | |
| SCR - B3F- cell Windstorm F3 | | |
| SCR - B3F- cell Windstorm G3 | | |
| SCR - B3F- cell Windstorm H3 | | |
| SCR - B3F- cell Windstorm A20 | The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country (ies)? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20? | |
| SCR - B3F- cell Windstorm B20 | | |
| SCR - B3F- cell Windstorm C20 | | |
| SCR - B3F- cell Windstorm E20 | | |
| SCR - B3F- cell Windstorm F20 | | |
| SCR - B3F- cell Windstorm G20 | | |
| SCR - B3F- cell Windstorm H20 | | |

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|---|---|---|
| SCR - B3F- cell Windstorm A22 | | |
| SCR - B3F- cell Windstorm F22 | | |
| SCR - B3F- cell Windstorm G22 | | |
| SCR - B3F- cell Windstorm H22 | | |
| SCR - B3F- cell Windstorm I22 | | |
| SCR - B3F- cell Windstorm F25 | | |
| SCR - B3F- cell Windstorm I25 | | |
| SCR - B3F- cell Earthquake A1 | The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20. | |
| SCR - B3F- cell Earthquake B1 | | |
| SCR - B3F- cell Earthquake C1 | | |
| SCR - B3F- cell Earthquake E1 | | |
| SCR - B3F- cell Earthquake F1 | | |
| SCR - B3F- cell Earthquake G1 | | |
| SCR - B3F- cell Earthquake A2 | The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some | |

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| | countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20. | |
| SCR - B3F- cell Earthquake B2 | | |
| SCR - B3F- cell Earthquake C2 | | |
| SCR - B3F- cell Earthquake E2 | | |
| SCR - B3F- cell Earthquake F2 | | |
| SCR - B3F- cell Earthquake G2 | | |
| SCR - B3F- cell Earthquake A3 | The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20. | |
| SCR - B3F- cell Earthquake B3 | | |
| SCR - B3F- cell Earthquake C3 | | |
| SCR - B3F- cell Earthquake E3 | | |
| SCR - B3F- cell Earthquake F3 | | |
| SCR - B3F- cell Earthquake G3 | | |
| SCR - B3F- cell Earthquake A20 | The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow | |

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| | in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20. | |
| SCR - B3F- cell Earthquake B20 | | |
| SCR - B3F- cell Earthquake C20 | | |
| SCR - B3F- cell Earthquake E20 | | |
| SCR - B3F- cell Earthquake F20 | | |
| SCR - B3F- cell Earthquake G20 | | |
| SCR - B3F- cell Earthquake A22 | | |
| SCR - B3F- cell Earthquake E22 | | |
| SCR - B3F- cell Earthquake F22 | | |
| SCR - B3F- cell Earthquake G22 | | |
| SCR - B3F- cell Earthquake H22 | | |
| SCR - B3F- cell Earthquake E25 | | |
| SCR - B3F- cell Earthquake H25 | | |
| SCR - B3F- cell Flood A1 | The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20. | |

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| SCR - B3F- cell Flood B1 | | |
| SCR - B3F- cell Flood C1 | | |
| SCR - B3F- cell Flood E1 | | |
| SCR - B3F- cell Flood F1 | | |
| SCR - B3F- cell Flood G1 | | |
| SCR - B3F- cell Flood H1 | | |
| SCR - B3F- cell Flood A2 | The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20. | |
| SCR - B3F- cell Flood B2 | | |
| SCR - B3F- cell Flood C2 | | |
| SCR - B3F- cell Flood E2 | | |
| SCR - B3F- cell Flood F2 | | |
| SCR - B3F- cell Flood G2 | | |
| SCR - B3F- cell Flood H2 | | |
| SCR - B3F- cell Flood A3 | The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20. | |
| SCR - B3F- cell Flood B3 | | |
| SCR - B3F- cell Flood C3 | | |
| SCR - B3F- cell Flood E3 | | |
| SCR - B3F- cell Flood F3 | | |
| SCR - B3F- cell Flood G3 | | |

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| SCR - B3F- cell Flood H3 | | |
| SCR - B3F- cell Flood A20 | The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20. | |
| SCR - B3F- cell Flood B20 | | |
| SCR - B3F- cell Flood C20 | | |
| SCR - B3F- cell Flood E20 | | |
| SCR - B3F- cell Flood F20 | | |
| SCR - B3F- cell Flood G20 | | |
| SCR - B3F- cell Flood H20 | | |
| SCR - B3F- cell Flood A22 | | |
| SCR - B3F- cell Flood F22 | | |
| SCR - B3F- cell Flood G22 | | |
| SCR - B3F- cell Flood H22 | | |
| SCR - B3F- cell Flood I22 | | |
| SCR - B3F- cell Flood F25 | | |
| SCR - B3F- cell Flood I25 | | |
| | The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20. | |
| SCR - B3F- cell Hail A1 | | |
| SCR - B3F- cell Hail B1 | | |
| SCR - B3F- cell Hail C1 | | |
| SCR - B3F- cell Hail E1 | | |

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|---|---|---|
| SCR - B3F- cell Hail F1 | | |
| SCR - B3F- cell Hail G1 | | |
| SCR - B3F- cell Hail H1 | | |
| SCR - B3F- cell Hail A2 | The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20. | |
| SCR - B3F- cell Hail B2 | | |
| SCR - B3F- cell Hail C2 | | |
| SCR - B3F- cell Hail E2 | | |
| SCR - B3F- cell Hail F2 | | |
| SCR - B3F- cell Hail G2 | | |
| SCR - B3F- cell Hail H2 | | |
| SCR - B3F- cell Hail A3 | The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20. | |
| SCR - B3F- cell Hail B3 | | |
| SCR - B3F- cell Hail C3 | | |
| SCR - B3F- cell Hail E3 | | |
| SCR - B3F- cell Hail F3 | | |
| SCR - B3F- cell Hail G3 | | |
| SCR - B3F- cell Hail H3 | | |
| SCR - B3F- cell Hail A20 | The row labels refer to EEA regions 1 to 20. Is there supposed to be a relation somewhere that relates e.g. EEA region 1 to a specific country(ies) ? L2 (Oct 2011) text specifically excludes some | |

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| | countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA region 20. | |
| SCR - B3F- cell Hail B20 | | |
| SCR - B3F- cell Hail C20 | | |
| SCR - B3F- cell Hail E20 | | |
| SCR - B3F- cell Hail F20 | | |
| SCR - B3F- cell Hail G20 | | |
| SCR - B3F- cell Hail H20 | | |
| SCR - B3F- cell Hail A22 | | |
| SCR - B3F- cell Hail F22 | | |
| SCR - B3F- cell Hail G22 | | |
| SCR - B3F- cell Hail H22 | | |
| SCR - B3F- cell Hail I22 | | |
| SCR - B3F- cell Hail F25 | | |
| SCR - B3F- cell Hail I25 | | |
| SCR - B3F- cell Subsidence A1 | | |
| SCR - B3F- cell Subsidence B1 | | |
| SCR - B3F- cell Subsidence C1 | | |
| SCR - B3F- cell Subsidence F1 | | |
| SCR - B3F- cell Subsidence G1 | | |
| SCR - B3F- cell Subsidence H1 | | |

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| SCR - B3F- cell Subsidence E3 | | |
| SCR - B3F- cell Subsidence H3 | | |
| SCR - B3F- cell Non-proportional property reinsurance A1 | | |
| SCR - B3F- cell Non-proportional property reinsurance B1 | | |
| SCR - B3F- cell Non-proportional property reinsurance C1 | | |
| SCR - B3F- cell Non-proportional property reinsurance D1 | | |
| SCR - B3F- cell Motor Vehicle Liability A1 | | |
| SCR - B3F- cell Motor Vehicle Liability A2 | | |
| SCR - B3F- cell Motor Vehicle Liability A3 | | |
| SCR - B3F- cell Motor Vehicle Liability A4 | | |
| SCR - B3F- cell Motor Vehicle Liability A5 | | |
| SCR - B3F- cell Marine Tanker Collision A1 | The header stating – Maximum marine hull – should be rephrased into Marine Hull or equivalent, since the SF calculation in L2 (Oct 2011) text is based on a given tanker having the maximum sum of the three (Marine Hull + Marine Liability + Marine Oil Pollution Liability), not the maximum of the components of the sum. | |
| SCR - B3F- cell Marine Tanker Collision B1 | The header stating – Maximum marine hull – should be rephrased into Marine Hull or equivalent, since the SF calculation in L2 (Oct 2011) text is based on a given tanker having the maximum sum | |

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| | of the three (Marine Hull + Marine Liability + Marine Oil Pollution Liability), not the maximum of the components of the sum. | |
| SCR - B3F- cell Marine Tanker Collision C1 | The header stating – Maximum marine hull – should be rephrased into Marine Hull or equivalent, since the SF calculation in L2 (Oct 2011) text is based on a given tanker having the maximum sum of the three (Marine Hull + Marine Liability + Marine Oil Pollution Liability), not the maximum of the components of the sum. | |
| SCR - B3F- cell Marine Tanker Collision A2 | | |
| SCR - B3F- cell Marine Tanker Collision B2 | | |
| SCR - B3F- cell Marine Tanker Collision C2 | | |
| SCR - B3F- cell Marine Tanker Collision A3 | | |
| SCR - B3F- cell Marine Tanker Collision B3 | | |
| SCR - B3F- cell Marine Tanker Collision C3 | | |
| SCR - B3F- cell Marine Platform Explosion A5 | | |
| SCR - B3F- cell Marine Platform Explosion B5 | | |
| SCR - B3F- cell Marine Platform Explosion C5 | | |
| SCR - B3F- cell Marine Platform Explosion D5 | | |
| SCR - B3F- cell Marine Platform Explosion E5 | | |
| SCR - B3F- cell Marine Platform Explosion A6 | | |
| SCR - B3F- cell Marine Platform Explosion B6 | | |

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| SCR - B3F- cell Marine Platform Explosion C6 | | |
| SCR - B3F- cell Marine Platform Explosion D6 | | |
| SCR - B3F- cell Marine Platform Explosion E6 | | |
| SCR - B3F- cell Marine Platform Explosion A7 | | |
| SCR - B3F- cell Marine Platform Explosion B7 | | |
| SCR - B3F- cell Marine Platform Explosion C7 | | |
| SCR - B3F- cell Marine Platform Explosion D7 | | |
| SCR - B3F- cell Marine Platform Explosion E7 | | |
| SCR - B3F- cell Marine C9 | | |
| SCR - B3F- cell Marine C11 | | |
| SCR - B3F- cell Aviation A1 | | |
| SCR - B3F- cell Aviation B1 | | |
| SCR - B3F- cell Aviation A2 | | |
| SCR - B3F- cell Aviation B2 | | |
| SCR - B3F- cell Aviation A3 | | |
| SCR - B3F- cell Aviation B3 | | |
| SCR - B3F- cell Fire A1 | | |
| SCR - B3F- cell Fire A2 | | |
| SCR - B3F- cell Fire A3 | | |
| SCR - B3F- cell Liability A1 | | |
| SCR - B3F- cell Liability B1 | | |

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| SCR - B3F- cell Liability C1 | | |
| SCR - B3F- cell Liability D1 | | |
| SCR - B3F- cell Liability E1 | | |
| SCR - B3F- cell Liability A2 | What should undertaking put here in case of an unlimited cover ? | |
| SCR - B3F- cell Liability B2 | | |
| SCR - B3F- cell Liability C2 | | |
| SCR - B3F- cell Liability D2 | | |
| SCR - B3F- cell Liability E2 | | |
| SCR - B3F- cell Liability A3 | | |
| SCR - B3F- cell Liability B3 | | |
| SCR - B3F- cell Liability C3 | | |
| SCR - B3F- cell Liability D3 | | |
| SCR - B3F- cell Liability E3 | | |
| SCR - B3F- cell Liability A4 | The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums. | |
| SCR - B3F- cell Liability B4 | The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums. | |
| SCR - B3F- cell Liability C4 | The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums. | |
| SCR - B3F- cell Liability D4 | The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums. | |
| SCR - B3F- cell Liability E4 | The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums. | |

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|---|--|---|
| SCR - B3F- cell Liability A1 | | |
| SCR - B3F- cell Liability A5 | | |
| SCR - B3F- cell Liability B5 | | |
| SCR - B3F- cell Liability C5 | | |
| SCR - B3F- cell Liability D5 | | |
| SCR - B3F- cell Liability E5 | | |
| SCR - B3F- cell Liability A6 | | |
| SCR - B3F- cell Liability B6 | | |
| SCR - B3F- cell Liability C6 | | |
| SCR - B3F- cell Liability D6 | | |
| SCR - B3F- cell Liability E6 | | |
| SCR - B3F- cell Liability A8 | The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums. | |
| SCR - B3F- cell Liability B8 | The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums. | |
| SCR - B3F- cell Liability C8 | The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums. | |
| SCR - B3F- cell Liability D8 | The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums. | |
| SCR - B3F- cell Liability E8 | The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums. | |
| SCR - B3F- cell Liability A9 | | |
| SCR - B3F- cell Liability B9 | | |

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| SCR - B3F- cell Liability C9 | | |
| SCR - B3F- cell Liability D9 | | |
| SCR - B3F- cell Liability E9 | | |
| SCR - B3F- cell Liability A10 | | |
| SCR - B3F- cell Liability B10 | | |
| SCR - B3F- cell Liability C10 | | |
| SCR - B3F- cell Liability D10 | | |
| SCR - B3F- cell Liability E10 | | |
| SCR - B3F- cell Liability A12 | The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums. | |
| SCR - B3F- cell Liability B12 | The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums. | |
| SCR - B3F- cell Liability C12 | The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums. | |
| SCR - B3F- cell Liability D12 | The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums. | |
| SCR - B3F- cell Liability E12 | The L2 text (Oct 2011) is not proposing any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums. | |
| SCR - B3F- cell Liability H12 | | |
| SCR - B3F- cell Liability A14 | | |
| SCR - B3F- cell Liability B14 | | |

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| SCR - B3F- cell Liability C14 | | |
| SCR - B3F- cell Liability D14 | | |
| SCR - B3F- cell Liability E14 | | |
| SCR - B3F- cell Liability H14 | | |
| SCR - B3F- cell Credit & Suretyship Large Credit Default A1 | | |
| SCR - B3F- cell Credit & Suretyship Large Credit Default B1 | | |
| SCR - B3F- cell Credit & Suretyship Large Credit Default A2 | | |
| SCR - B3F- cell Credit & Suretyship Large Credit Default B2 | | |
| SCR - B3F- cell Credit & Suretyship Large Credit Default A4 | | |
| SCR - B3F- cell Credit & Suretyship Large Credit Default B4 | | |
| SCR - B3F- cell Credit & Suretyship Large Credit Default A5 | | |
| SCR - B3F- cell Credit & Suretyship Large Credit Default B5 | | |
| SCR - B3F- cell Credit & Suretyship Recession Risk | | |

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| A7 | | |
| SCR - B3F- cell Credit & Suretyship Recession Risk A8 | | |
| SCR - B3F- cell Credit & Suretyship Recession Risk A9 | | |
| SCR - B3F- cell Credit & Suretyship Recession Risk A10 | | |
| SCR - B3F- cell Credit & Suretyship C12 | | |
| SCR - B3F- cell Credit & Suretyship C14 | | |
| SCR - B3F- cell Other non-life catastrophe risk A1 | | |
| SCR - B3F- cell Other non-life catastrophe risk B1 | | |
| SCR - B3F- cell Other non-life catastrophe risk C1 | | |
| SCR - B3F- cell Other non-life catastrophe risk D1 | | |
| SCR - B3F- cell Other non-life catastrophe risk E1 | | |
| SCR - B3F- cell Other non-life catastrophe risk A2 | | |
| SCR - B3F- cell Other non-life catastrophe risk B2 | | |
| SCR - B3F- cell Other non-life catastrophe risk C2 | | |
| SCR - B3F- cell Other non-life catastrophe risk D2 | | |

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| SCR - B3F- cell Other non-life catastrophe risk E2 | | |
| SCR - B3F- cell Other non-life catastrophe risk H2 | | |
| SCR - B3F- cell Other non-life catastrophe risk A4 | | |
| SCR - B3F- cell Other non-life catastrophe risk B4 | | |
| SCR - B3F- cell Other non-life catastrophe risk C4 | | |
| SCR - B3F- cell Other non-life catastrophe risk D4 | | |
| SCR - B3F- cell Other non-life catastrophe risk E4 | | |
| SCR - B3F- cell Other non-life catastrophe risk H4 | | |
| SCR - B3F- cell Mass Accident A1 | | |
| SCR - B3F- cell Mass Accident B1 | | |
| SCR - B3F- cell Mass Accident C1 | | |
| SCR - B3F- cell Mass Accident D1 | | |
| SCR - B3F- cell Mass Accident E1 | | |
| SCR - B3F- cell Mass Accident F1 | | |
| SCR - B3F- cell Mass Accident G1 | | |
| SCR - B3F- cell Mass Accident H1 | | |

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| SCR - B3F- cell Mass Accident I1 | | |
| SCR - B3F- cell Mass Accident J1 | | |
| SCR - B3F- cell Mass Accident K1 | | |
| SCR - B3F- cell Mass Accident L1 | | |
| SCR - B3F- cell Mass Accident M1 | | |
| SCR - B3F- cell Mass Accident A2 | | |
| SCR - B3F- cell Mass Accident B2 | | |
| SCR - B3F- cell Mass Accident C2 | | |
| SCR - B3F- cell Mass Accident D2 | | |
| SCR - B3F- cell Mass Accident E2 | | |
| SCR - B3F- cell Mass Accident F2 | | |
| SCR - B3F- cell Mass Accident G2 | | |
| SCR - B3F- cell Mass Accident H2 | | |
| SCR - B3F- cell Mass Accident I2 | | |
| SCR - B3F- cell Mass Accident J2 | | |
| SCR - B3F- cell Mass Accident K2 | | |

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| SCR - B3F- cell Mass Accident L2 | | |
| SCR - B3F- cell Mass Accident M2 | | |
| SCR - B3F- cell Mass Accident A3 | | |
| SCR - B3F- cell Mass Accident B3 | | |
| SCR - B3F- cell Mass Accident C3 | | |
| SCR - B3F- cell Mass Accident D3 | | |
| SCR - B3F- cell Mass Accident E3 | | |
| SCR - B3F- cell Mass Accident F3 | | |
| SCR - B3F- cell Mass Accident G3 | | |
| SCR - B3F- cell Mass Accident H3 | | |
| SCR - B3F- cell Mass Accident I3 | | |
| SCR - B3F- cell Mass Accident J3 | | |
| SCR - B3F- cell Mass Accident K3 | | |
| SCR - B3F- cell Mass Accident L3 | | |
| SCR - B3F- cell Mass Accident M3 | | |
| SCR - B3F- cell Mass Accident A20 | | |

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| SCR - B3F- cell Mass Accident B20 | | |
| SCR - B3F- cell Mass Accident C20 | | |
| SCR - B3F- cell Mass Accident D20 | | |
| SCR - B3F- cell Mass Accident E20 | | |
| SCR - B3F- cell Mass Accident F20 | | |
| SCR - B3F- cell Mass Accident G20 | | |
| SCR - B3F- cell Mass Accident H20 | | |
| SCR - B3F- cell Mass Accident I20 | | |
| SCR - B3F- cell Mass Accident J20 | | |
| SCR - B3F- cell Mass Accident K20 | | |
| SCR - B3F- cell Mass Accident L20 | | |
| SCR - B3F- cell Mass Accident M20 | | |
| SCR - B3F- cell Mass Accident K22 | | |
| SCR - B3F- cell Mass Accident N22 | | |
| SCR - B3F- cell Concentration Accident A1 | | |
| SCR - B3F- cell Concentration Accident B1 | | |

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| SCR - B3F- cell Concentration Accident C1 | | |
| SCR - B3F- cell Concentration Accident D1 | | |
| SCR - B3F- cell Concentration Accident E1 | | |
| SCR - B3F- cell Concentration Accident F1 | | |
| SCR - B3F- cell Concentration Accident G1 | | |
| SCR - B3F- cell Concentration Accident H1 | | |
| SCR - B3F- cell Concentration Accident I1 | | |
| SCR - B3F- cell Concentration Accident A2 | | |
| SCR - B3F- cell Concentration Accident B2 | | |
| SCR - B3F- cell Concentration Accident C2 | | |
| SCR - B3F- cell Concentration Accident D2 | | |
| SCR - B3F- cell Concentration Accident E2 | | |
| SCR - B3F- cell Concentration Accident F2 | | |
| SCR - B3F- cell Concentration Accident G2 | | |
| SCR - B3F- cell Concentration Accident H2 | | |
| SCR - B3F- cell Concentration Accident I2 | | |

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| SCR - B3F- cell Concentration Accident A3 | | |
| SCR - B3F- cell Concentration Accident B3 | | |
| SCR - B3F- cell Concentration Accident C3 | | |
| SCR - B3F- cell Concentration Accident D3 | | |
| SCR - B3F- cell Concentration Accident E3 | | |
| SCR - B3F- cell Concentration Accident F3 | | |
| SCR - B3F- cell Concentration Accident G3 | | |
| SCR - B3F- cell Concentration Accident H3 | | |
| SCR - B3F- cell Concentration Accident I3 | | |
| SCR - B3F- cell Concentration Accident A20 | | |
| SCR - B3F- cell Concentration Accident B20 | | |
| SCR - B3F- cell Concentration Accident C20 | | |
| SCR - B3F- cell Concentration Accident D20 | | |
| SCR - B3F- cell Concentration Accident E20 | | |
| SCR - B3F- cell Concentration Accident F20 | | |
| SCR - B3F- cell Concentration Accident G20 | | |

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| SCR - B3F- cell Concentration Accident H20 | | |
| SCR - B3F- cell Concentration Accident I20 | | |
| SCR - B3F- cell Concentration Accident G22 | | |
| SCR - B3F- cell Concentration Accident J22 | | |
| SCR - B3F- cell Pandemic A1 | | |
| SCR - B3F- cell Pandemic B1 | | |
| SCR - B3F- cell Pandemic C1 | | |
| SCR - B3F- cell Pandemic D1 | | |
| SCR - B3F- cell Pandemic E1 | | |
| SCR - B3F- cell Pandemic F1 | | |
| SCR - B3F- cell Pandemic A2 | | |
| SCR - B3F- cell Pandemic B2 | | |
| SCR - B3F- cell Pandemic C2 | | |
| SCR - B3F- cell Pandemic D2 | | |
| SCR - B3F- cell Pandemic E2 | | |
| SCR - B3F- cell Pandemic F2 | | |

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| SCR - B3F- cell Pandemic A3 | | |
| SCR - B3F- cell Pandemic B3 | | |
| SCR - B3F- cell Pandemic C3 | | |
| SCR - B3F- cell Pandemic D3 | | |
| SCR - B3F- cell Pandemic E3 | | |
| SCR - B3F- cell Pandemic F2 | | |
| SCR - B3F- cell Pandemic A20 | | |
| SCR - B3F- cell Pandemic B20 | | |
| SCR - B3F- cell Pandemic C20 | | |
| SCR - B3F- cell Pandemic D20 | | |
| SCR - B3F- cell Pandemic E20 | | |
| SCR - B3F- cell Pandemic F20 | | |
| SCR - B3F- cell Pandemic F21 | | |
| SCR - B3F- cell Pandemic D22 | | |
| SCR - B3F- cell Pandemic G22 | | |
| SCR - B3G – General | | |

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| SCR - B3G - Purpose | | |
| SCR - B3G - Benefits | | |
| SCR - B3G - Costs | | |
| SCR - B3G - Groups | | |
| SCR - B3G - Materiality | | |
| SCR - B3G - Disclosure | | |
| SCR - B3G - Frequency | | |
| SCR - B3G- cell A1 | | |
| SCR - B3G- cell A2 | | |
| SCR - B3G- cell A3 | | |
| SCR - B3G- cell A4 | | |
| SCR - B3G- cell A5 | | |
| SCR - B3G- cell A6 | | |
| SCR - B3G- cell A7 | | |
| SCR - B3G- cell A8 | | |
| SCR - B3G- cell A9 | | |
| SCR - B3G- cell A10 | | |
| SCR - B3G- cell A11 | | |
| SCR - B3G- cell A12 | | |
| SCR - B3G- cell A13 | It should be made clearer in the text of the template that only 30 % of the net Basic Solvency Capital requirement should be entered, not the full extent. | |
| SCR - B3G- cell A14 | | |
| SCR - B3G- cell A15 | | |
| SCR - B3G- cell A16 | | |

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|----------------------------------|--|--|
| MCR - B4A & B4B – General | | |
| MCR - B4A & B4B – Purpose | | |
| MCR - B4A & B4B – Benefits | | |
| MCR - B4A & B4B – Costs | | |
| MCR - B4A & B4B – Groups | | |
| MCR - B4A & B4B – Materiality | | |
| MCR - B4A & B4B - Disclosure | | |
| MCR - B4A & B4B – Frequency | | |
| MCR - B4A- cell A1 | | |
| MCR - B4A- cell B2 | | |
| MCR - B4A- cell C2 | | |
| MCR - B4A- cell B3 | | |
| MCR - B4A- cell C3 | | |
| MCR - B4A- cell B4 | | |
| MCR - B4A- cell C4 | | |
| MCR - B4A- cell B5 | | |
| MCR - B4A- cell C5 | | |
| MCR - B4A- cell B6 | | |
| MCR - B4A- cell C6 | | |
| MCR - B4A- cell B7 | | |
| MCR - B4A- cell C7 | | |
| MCR - B4A- cell B8 | | |

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| MCR - B4A- cell C8 | | |
| MCR - B4A- cell B9 | | |
| MCR - B4A- cell C9 | | |
| MCR - B4A- cell B10 | | |
| MCR - B4A- cell C10 | | |
| MCR - B4A- cell B11 | | |
| MCR - B4A- cell C11 | | |
| MCR - B4A- cell B12 | | |
| MCR - B4A- cell C12 | | |
| MCR - B4A- cell B13 | | |
| MCR - B4A- cell C13 | | |
| MCR - B4A- cell B14 | | |
| MCR - B4A- cell C14 | | |
| MCR - B4A- cell B15 | | |
| MCR - B4A- cell C15 | | |
| MCR - B4A- cell B16 | | |
| MCR - B4A- cell C16 | | |
| MCR - B4A- cell B17 | | |
| MCR - B4A- cell C17 | | |
| MCR - B4A- cell A18 | | |
| MCR - B4A- cell B19 | | |
| MCR - B4A- cell B20 | | |
| MCR - B4A- cell B21 | | |
| MCR - B4A- cell B22 | | |
| MCR - B4A- cell C23 | | |
| MCR - B4A- cell A24 | | |

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| MCR - B4A- cell A25 | | |
| MCR - B4A- cell A26 | | |
| MCR - B4A- cell A27 | | |
| MCR - B4A- cell A28 | | |
| MCR - B4A- cell A29 | | |
| MCR - B4A- cell A30 | | |
| MCR - B4A- cell A31 | | |
| MCR - B4B- cell B1 | | |
| MCR - B4B- cell C1 | | |
| MCR - B4B- cell D2 | | |
| MCR - B4B- cell E2 | | |
| MCR - B4B- cell F2 | | |
| MCR - B4B- cell G2 | | |
| MCR - B4B- cell D3 | | |
| MCR - B4B- cell E3 | | |
| MCR - B4B- cell F3 | | |
| MCR - B4B- cell G3 | | |
| MCR - B4B- cell D4 | | |
| MCR - B4B- cell E4 | | |
| MCR - B4B- cell F4 | | |
| MCR - B4B- cell G4 | | |
| MCR - B4B- cell D5 | | |
| MCR - B4B- cell E5 | | |
| MCR - B4B- cell F5 | | |
| MCR - B4B- cell G5 | | |
| MCR - B4B- cell D6 | | |

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| MCR - B4B- cell E6 | | |
| MCR - B4B- cell F6 | | |
| MCR - B4B- cell G6 | | |
| MCR - B4B- cell D7 | | |
| MCR - B4B- cell E7 | | |
| MCR - B4B- cell F7 | | |
| MCR - B4B- cell G7 | | |
| MCR - B4B- cell D8 | | |
| MCR - B4B- cell E8 | | |
| MCR - B4B- cell F8 | | |
| MCR - B4B- cell G8 | | |
| MCR - B4B- cell D9 | | |
| MCR - B4B- cell E9 | | |
| MCR - B4B- cell F9 | | |
| MCR - B4B- cell G9 | | |
| MCR - B4B- cell D10 | | |
| MCR - B4B- cell E10 | | |
| MCR - B4B- cell F10 | | |
| MCR - B4B- cell G10 | | |
| MCR - B4B- cell D11 | | |
| MCR - B4B- cell E11 | | |
| MCR - B4B- cell F11 | | |
| MCR - B4B- cell G11 | | |
| MCR - B4B- cell D12 | | |
| MCR - B4B- cell E12 | | |
| MCR - B4B- cell F12 | | |

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| MCR - B4B- cell G12 | | |
| MCR - B4B- cell D13 | | |
| MCR - B4B- cell E13 | | |
| MCR - B4B- cell F13 | | |
| MCR - B4B- cell G13 | | |
| MCR - B4B- cell D14 | | |
| MCR - B4B- cell E14 | | |
| MCR - B4B- cell F14 | | |
| MCR - B4B- cell G14 | | |
| MCR - B4B- cell D15 | | |
| MCR - B4B- cell E15 | | |
| MCR - B4B- cell F15 | | |
| MCR - B4B- cell G15 | | |
| MCR - B4B- cell D16 | | |
| MCR - B4B- cell E16 | | |
| MCR - B4B- cell F16 | | |
| MCR - B4B- cell G16 | | |
| MCR - B4B- cell D17 | | |
| MCR - B4B- cell E17 | | |
| MCR - B4B- cell F17 | | |
| MCR - B4B- cell G17 | | |
| MCR - B4B- cell B18 | | |
| MCR - B4B- cell C18 | | |
| MCR - B4B- cell D19 | | |
| MCR - B4B- cell F19 | | |
| MCR - B4B- cell D20 | | |

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| MCR - B4B- cell F20 | | |
| MCR - B4B- cell D21 | | |
| MCR - B4B- cell F21 | | |
| MCR - B4B- cell D22 | | |
| MCR - B4B- cell F22 | | |
| MCR - B4B- cell E23 | | |
| MCR - B4B- cell G23 | | |
| MCR - B4B- cell A24 | | |
| MCR - B4B- cell A25 | | |
| MCR - B4B- cell A26 | | |
| MCR - B4B- cell A27 | | |
| MCR - B4B- cell A28 | | |
| MCR - B4B- cell A29 | | |
| MCR - B4B- cell A30 | | |
| MCR - B4B- cell A31 | | |
| MCR - B4B- cell B32 | | |
| MCR - B4B- cell C32 | | |
| MCR - B4B- cell B33 | | |
| MCR - B4B- cell C33 | | |
| MCR - B4B- cell B34 | | |
| MCR - B4B- cell C34 | | |
| MCR - B4B- cell B35 | | |
| MCR - B4B- cell C35 | | |
| MCR - B4B- cell B36 | | |
| MCR - B4B- cell C36 | | |
| MCR - B4B- cell B37 | | |

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|-----------------------------------|--|--|
| MCR - B4B- cell C37 | | |
| MCR - B4B- cell B38 | | |
| MCR - B4B- cell C38 | | |
| MCR - B4B- cell B39 | | |
| MCR - B4B- cell C39 | | |
| Assets - D1- General | | |
| Assets - D1- Purpose | | |
| Assets - D1- Benefits | | |
| Assets - D1- Costs | | |
| Assets - D1- Groups | | |
| Assets - D1- Materiality | | |
| Assets - D1- Disclosure | | |
| Assets - D1- Frequency | | |
| Assets - D1 - Quarterly Exemption | | |
| Assets - D1- cell A1 | | |
| Assets - D1- cell A2 | | |
| Assets - D1- cell A3 | | |
| Assets - D1- cell A4 | | |
| Assets - D1- cell A5 | | |
| Assets - D1- cell A6 | | |
| Assets - D1- cell A7 | | |
| Assets - D1- cell A8 | | |
| Assets - D1- cell A9 | | |

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| | | |
|---------------------------|--|--|
| Assets - D1- cell A10 | | |
| Assets - D1- cell A11 | The large CIC classification matrix is difficult to maintain with a high accuracy, i.e. it increases the operational risk - still ambiguous, e.g. companies might classify differently, e.g. should 'Government Guaranteed belong to Government, Other or Corporate, Other | |
| Assets - D1- cell A12 | | |
| Assets - D1- cell A13 | | |
| Assets - D1- cell A15 | | |
| Assets - D1- cell A16 | | |
| Assets - D1- cell A17 | | |
| Assets - D1- cell A18 | What is the definition of a closed contract? – closed during this financial year, last quarter etc.? | |
| Assets - D1- cell A19 | | |
| Assets - D1- cell A20 | | |
| Assets - D1- cell A22 | | |
| Assets - D1- cell A23 | | |
| Assets - D1- cell A24 | | |
| Assets - D1- cell A25 | | |
| Assets - D1- cell A26 | | |
| Assets - D1- cell A28 | | |
| Assets - D1- cell A30 | | |
| Assets - D1Q- General | | |
| Assets - D1Q- Purpose | | |
| Assets - D1Q- Benefits | | |
| Assets - D1Q- Costs | | |
| Assets - D1Q- Groups | | |
| Assets - D1Q- Materiality | | |

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|-------------------------------|--|--|
| Assets - D1Q- Disclosure | | |
| Assets - D1Q- Frequency | | |
| Assets - D1Q- cell A1 (list) | | |
| Assets - D1Q- cell A2 (list) | | |
| Assets - D1Q- cell A3 (list) | | |
| Assets - D1Q- cell A4 (list) | | |
| Assets - D1Q- cell A5 (list) | | |
| Assets - D1Q- cell A6 (list) | | |
| Assets - D1Q- cell A7 (list) | | |
| Assets - D1Q- cell A8 (list) | | |
| Assets - D1Q- cell A9 (list) | | |
| Assets - D1Q- cell A10 (list) | | |
| Assets - D1Q- cell A12 (list) | | |
| Assets - D1Q- cell A13 (list) | | |
| Assets - D1Q- cell A14 (list) | | |
| Assets - D1Q- cell A15 (list) | | |
| Assets - D1Q- cell A16 (list) | | |
| Assets - D1Q- cell A17 (list) | | |
| Assets - D1Q- cell A18 (list) | | |
| Assets - D1Q- cell A20 (list) | | |
| Assets - D1Q- cell A22 (list) | | |
| Assets - D1Q- cell A24 (list) | | |
| Assets - D1Q- cell A25 (list) | | |
| Assets - D1Q- cell A28 (list) | | |
| Assets - D1Q- cell A30 (list) | | |

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|-------------------------|--|--|
| Assets - D1Q- cell A3 | | |
| Assets - D1Q- cell A5 | | |
| Assets - D1Q- cell A6 | | |
| Assets - D1Q- cell A7 | | |
| Assets - D1Q- cell A7A | | |
| Assets - D1Q- cell A8 | | |
| Assets - D1Q- cell A8A | | |
| Assets - D1Q- cell A8C | | |
| Assets - D1Q- cell A8D | | |
| Assets - D1Q- cell A9A | | |
| Assets - D1Q- cell A9B | | |
| Assets - D1Q- cell A9C | | |
| Assets - D1Q- cell A9D | | |
| Assets - D1Q- cell A9E | | |
| Assets - D1Q- cell A9F | | |
| Assets - D1Q- cell A10A | | |
| Assets - D1Q- cell A10B | | |
| Assets - D1Q- cell A14 | | |
| Assets - D1Q- cell A11 | | |
| Assets - D1Q- cell A12 | | |
| Assets - D1Q- cell A13 | | |
| Assets - D1Q- cell A27 | | |
| Assets - D1Q- cell L16 | | |
| Assets - D1S- General | | |
| Assets - D1S- Purpose | | |

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|---------------------------|---|--|
| Assets - D1S- Benefits | | |
| Assets - D1S- Costs | | |
| Assets - D1S- Groups | | |
| Assets - D1S- Materiality | | |
| Assets - D1S- Disclosure | | |
| Assets - D1S- Frequency | | |
| Assets - D1S- cell A1 | | |
| Assets - D1S- cell A2 | | |
| Assets - D1S- cell A3 | | |
| Assets - D1S- cell A4 | | |
| Assets - D1S- cell A5 | | |
| Assets - D1S- cell A6 | | |
| Assets - D1S- cell A7 | | |
| Assets - D1S- cell A8 | | |
| Assets - D1S- cell A9 | | |
| Assets - D1S- cell A10 | | |
| Assets - D1S- cell A12 | | |
| Assets - D1S- cell A13 | | |
| Assets - D1S- cell A14 | | |
| Assets - D1S- cell A15 | | |
| Assets – D20- General | Underlying assets in derivatives are not possible to derive in the report, e.g. there are 4 legs in an Fx-swap but only two fields to report. Is there a reason for this? | |
| Assets – D20- Purpose | | |
| Assets – D20- Benefits | | |

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|------------------------------------|--|--|
| Assets – D20- Costs | | |
| Assets – D20- Groups | | |
| Assets – D20- Materiality | | |
| Assets – D20- Disclosure | | |
| Assets – D20- Frequency | | |
| Assets – D20 – Quarterly Exemption | | |
| Assets - D20- cell A1 | | |
| Assets - D20- cell A2 | | |
| Assets - D20- cell A3 | | |
| Assets - D20- cell A4 | | |
| Assets - D20- cell A5 | | |
| Assets - D20- cell A6 | | |
| Assets - D20- cell A7 | | |
| Assets - D20- cell A8 | | |
| Assets - D20- cell A9 | | |
| Assets - D20- cell A10 | | |
| Assets - D20- cell A11 | | |
| Assets - D20- cell A13 | | |
| Assets - D20- cell A14 | | |
| Assets - D20- cell A15 | | |
| Assets - D20- cell A16 | | |
| Assets - D20- cell A17 | | |
| Assets - D20- cell A19 | | |
| Assets - D20- cell A20 | | |

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|---|---|---|
| Assets - D20- cell A21 | | |
| Assets - D20- cell A22 | | |
| Assets - D20- cell A23 | | |
| Assets - D20- cell A24 | | |
| Assets - D20- cell A25 | | |
| Assets - D20- cell A26 | | |
| Assets - D20- cell A27 | | |
| Assets - D20- cell A28 | | |
| Assets - D20- cell A29 | | |
| Assets - D20- cell A31 | | |
| Assets - D20- cell A32 | | |
| Assets - D20- cell A33 | | |
| Assets - D20- cell A34 | | |
| Assets - D20- cell A35 | | |
| Assets - D2T- General | <p>To meet the purpose we do only see a need for active derivative positions to be able to have an understanding about the risk in the portfolio.</p> <p>Transaction doesn't add any value if the receiver doesn't have a portfolio system where this could be monitored (i.e. supervisor).</p> | |
| Assets - D2T- Purpose | Since derivatives are not only used for hedging purposes but also to increase return, the purpose becomes somewhat inaccurate. | |
| Assets - D2T- Benefits | | |
| Assets - D2T- Costs | | |
| Assets - D2T- Groups | | |
| Assets - D2T- Materiality | | |
| Assets - D2T- Disclosure | | |

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| Assets - D2T- Frequency | | |
| Assets - D2T- Quarterly Exemption | | |
| Assets - D2T- cell A1 | | |
| Assets - D2T- cell A2 | | |
| Assets - D2T- cell A3 | | |
| Assets - D2T- cell A4 | | |
| Assets - D2T- cell A5 | | |
| Assets - D2T- cell A6 | | |
| Assets - D2T- cell A7 | | |
| Assets - D2T- cell A8 | | |
| Assets - D2T- cell A9 | | |
| Assets - D2T- cell A10 | | |
| Assets - D2T- cell A11 | | |
| Assets - D2T- cell A13 | | |
| Assets - D2T- cell A14 | | |
| Assets - D2T- cell A15 | | |
| Assets - D2T- cell A16 | | |
| Assets - D2T- cell A17 | | |
| Assets - D2T- cell A18 | | |
| Assets - D2T- cell A19 | | |
| Assets - D2T- cell A20 | | |
| Assets - D2T- cell A21 | | |
| Assets - D2T- cell A22 | | |
| Assets - D2T- cell A23 | | |
| Assets - D2T- cell A24 | | |

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|--------------------------|--|--|
| Assets - D2T- cell A25 | | |
| Assets - D2T- cell A26 | | |
| Assets - D2T- cell A27 | | |
| Assets - D2T- cell A28 | | |
| Assets - D2T- cell A30 | | |
| Assets - D2T- cell A31 | | |
| Assets - D2T- cell A32 | | |
| Assets - D2T- cell A34 | | |
| Assets - D2T- cell A35 | | |
| Assets – D3- General | This information is already reported in the annual report on a level more suitable for the industry. Double reporting should be avoided. | |
| Assets – D3- Purpose | Investment systems calculate performance in original currencies. A conversion to reporting currencies where consideration is taken to currency hedges requires massive system changes. | |
| Assets – D3- Benefits | | |
| Assets – D3- Costs | | |
| Assets – D3- Groups | | |
| Assets – D3- Materiality | | |
| Assets – D3- Disclosure | | |
| Assets – D3- Frequency | | |
| Assets - D3- cell A1 | | |
| Assets - D3- cell A3 | | |
| Assets - D3- cell A4 | | |
| Assets - D3- cell A6 | | |
| Assets - D3- cell A7 | | |
| Assets - D3- cell A8 | | |

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| | | |
|-----------------------------------|---|--|
| Assets - D3- cell A15 | Mark to market result would be more adequate to use from a supervisory perspective. | |
| Assets - D4- General | To receive information from Investment Funds will be a challenge, especially on a quarterly basis. There will be a lot of manual work involved with large risk of human errors. Timing issue will also be challenging especially for quarterly reporting. Furthermore, will the information received be sufficient? What about funds that has underlying exposure to other currencies? This will most likely not be captured within present structure. | |
| Assets - D4- Purpose | | |
| Assets - D4- Benefits | | |
| Assets - D4- Costs | | |
| Assets - D4- Groups | | |
| Assets - D4- Materiality | | |
| Assets - D4- Disclosure | | |
| Assets - D4- Frequency | | |
| Assets - D4 - Quarterly Exemption | | |
| Assets - D4- cell A1 | | |
| Assets - D4- cell A2 | | |
| Assets - D4- cell A3 | | |
| Assets - D4- cell A4 | Underlying asset category will be impossible to retrieve for some private equity funds. | |
| Assets - D4- cell A5 | | |
| Assets - D4- cell A6 | | |
| Assets - D4- cell A7 | | |
| Assets - D4- cell A8 | | |
| Assets - D5- General | | |
| Assets - D5- Purpose | | |

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| | | |
|--------------------------|--|--|
| Assets – D5- Benefits | | |
| Assets – D5- Costs | | |
| Assets – D5- Groups | | |
| Assets – D5- Materiality | | |
| Assets – D5- Disclosure | | |
| Assets – D5- Frequency | | |
| Assets - D5- cell A1 | | |
| Assets - D5- cell A2 | | |
| Assets - D5- cell A3 | | |
| Assets - D5- cell A4 | | |
| Assets - D5- cell A5 | | |
| Assets - D5- cell A6 | | |
| Assets - D5- cell A7 | | |
| Assets - D5- cell A8 | | |
| Assets - D5- cell A9 | | |
| Assets - D5- cell A10 | | |
| Assets - D5- cell A11 | | |
| Assets - D5- cell A12 | | |
| Assets - D5- cell A13 | | |
| Assets - D5- cell A14 | | |
| Assets – D6- General | | |
| Assets – D6- Purpose | | |
| Assets – D6- Benefits | | |
| Assets – D6- Costs | | |

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| | | |
|--------------------------|--|--|
| Assets – D6- Groups | | |
| Assets – D6- Materiality | | |
| Assets – D6- Disclosure | | |
| Assets – D6- Frequency | | |
| Assets - D6- cell A2 | | |
| Assets - D6- cell A3 | | |
| Assets - D6- cell A4 | | |
| Assets - D6- cell A5 | | |
| Assets - D6- cell A6 | | |
| Assets - D6- cell A7 | | |
| Assets - D6- cell A8 | | |
| Assets - D6- cell A9 | | |
| Assets - D6- cell A10 | | |
| Assets - D6- cell A12 | | |
| Assets - D6- cell A19 | | |
| Assets - D6- cell A20 | | |
| Assets - D6- cell A21 | | |
| Assets - D6- cell A22 | | |
| Assets - D6- cell A24 | | |
| Assets - D6- cell A25 | | |
| Assets - D6- cell A26 | | |
| Assets - D6- cell A27 | | |
| Assets - D6- cell A28 | | |
| TP - F1 & F1Q- General | | |

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| | | |
|-----------------------------|--|--|
| TP - F1 & F1Q - Purpose | | |
| TP - F1 & F1Q - Benefits | | |
| TP - F1 & F1Q - Costs | | |
| TP - F1 & F1Q - Groups | | |
| TP - F1 & F1Q - Materiality | | |
| TP - F1 & F1Q - Disclosure | | |
| TP - F1 & F1Q - Frequency | | |
| TP - F1- cells A1 - A14 | | |
| TP - F1- cell A7A | | |
| TP - F1- cell A7B | | |
| TP - F1- cell A7C | | |
| TP - F1- cells B1 - B14 | | |
| TP - F1- cells B2 - C2 | | |
| TP - F1- cells B4-C1 | | |
| TP - F1- cells BA1 - BA13 | | |
| TP - F1- cell BB1 | | |
| TP - F1- cell BB10 | | |
| TP - F1- cell BB13 | | |
| TP - F1- cells BC1 - BC13 | | |
| TP - F1- cells BD1 - BD13 | | |
| TP - F1- cells BF1 - BF13 | | |
| TP - F1- cells CB1 - CB14A | | |
| TP - F1- cells CC1 - CC14 | | |
| TP - F1- cells CD1 - CD14A | | |

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| TP - F1- cells C1 – C14A | | |
| TP - F1- cells CB9A – C9A | | |
| TP - F1- cells E1 – E13 | | |
| TP - F1- cells FB7A | | |
| TP - F1- cells FB7B | | |
| TP - F1- cells FB7C | | |
| TP - F1- cells IA1 – IA 13 | | |
| TP - F1- cells J1 – JL13 | | |
| TP - F1- cells M1-M13 | | |
| TP - F1- cells N1-N13 | | |
| TP - F1- cells O1-O13 | | |
| TP - F1- cells P1-P13 | | |
| TP - F1- cells Q1-Q13 | | |
| TP - F1Q- cells A1-A13 | | |
| TP - F1Q- cell A7A | | |
| TP - F1Q- cell A7B | | |
| TP - F1Q- cell A7C | | |
| TP - F1Q- cells B1-B13 | | |
| TP - F1Q- cells C1-C14A | | |
| TP - F1Q- cell C11 | | |
| TP - F1Q- cell C12 | | |
| TP - F1Q- cell C13 | | |
| TP - F1Q- cell C14A | | |
| TP - F1Q- cell E1-E13 | | |
| TP – F2- General | Normal reserving method in non-life companies estimate total reserve levels. This approach would overhaul that general principle and would require drastic changes to methods currently | |

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| | used. Same template should be used also for annuities in the non-life company This sheet might be of use for the supervisor if more close supervision is needed, e.g. if a company breaches some limits. | |
| TP – F2- Purpose | | |
| TP – F2- Benefits | | |
| TP – F2- Costs | So far the actuarial methods have been sufficient for reserve levels and worked very well. Changing to cash flow based approach requires considerable amounts of resources. | |
| TP – F2- Groups | | |
| TP – F2- Materiality | | |
| TP – F2- Disclosure | | |
| TP – F2- Frequency | | |
| TP – F2- cells A1-A34 | | |
| TP – F2- cells C1 – C35 | | |
| TP -F2- cells D1-D35 | | |
| TP -F2- cells F1-F35 | | |
| TP -F2- cells AU1 –AU35 | | |
| TP -F2- cells CU1 – CU35 | | |
| TP -F2- cells DU1 – DU35 | | |
| TP -F2- cells FU1 – FU35 | | |
| TP -F2- cells I1 –I35 | | |
| TP -F2- cells J1 –J35 | | |
| TP -F2- cells K1 –K35 | | |
| TP -F2- cells L1 –L35 | | |
| TP -F2- cells M1 –M35 | | |

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| TP -F2- cells N1 –N35 | | |
| TP -F2- cells O1 –O35 | | |
| TP -F2- cells P1-P35 | | |
| TP -F2- cells Q1 –Q35 | | |
| TP -F2- cells R1 –R35 | | |
| TP -F2- cells S1 –S35 | | |
| TP -F2- cells T1 –T35 | | |
| TP -F2- cells U1 – U35 | | |
| TP -F2- cells CH1 –CH35 | | |
| TP -F2- cells DH1 –DH35 | | |
| TP -F2- cells FH1 –FH35 | | |
| TP -F2- cells V1 –V35 | | |
| TP -F2- cells X1 – X35 | | |
| TP -F2- cells Y1-Y35 | | |
| TP -F2- cells Z1- Z35 | | |
| TP -F2- cells GH1 –GH35 | | |
| TP – F3- General | | |
| TP – F3- Purpose | | |
| TP – F3- Benefits | | |
| TP – F3- Costs | | |
| TP – F3- Groups | | |
| TP – F3- Materiality | | |
| TP – F3- Disclosure | | |
| TP – F3- Frequency | | |

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| TP - F3- cell A1 | | |
| TP - F3- cell A2A | | |
| TP - F3- cell A2B | | |
| TP - F3- cell A2C | | |
| TP - F3- cell A3 | | |
| TP - F3- cell A4 | | |
| TP - F3- cell A5 | | |
| TP - F3- cell A6 | | |
| TP - F3- cell A7 | | |
| TP - F3- cell A8 | | |
| TP - F3- cell A9 | | |
| TP - F3- cell A10 | | |
| TP - F3- cell A15 | | |
| TP - F3- cell A21 | | |
| TP - F3- cell A24 | | |
| TP - F3- cell A26 | | |
| TP - F3- cell A30 | | |
| TP - F3- cell A34A | The definition in the LOG is not unambiguous and the purpose refers to a cell A20 which does not exist in the template anymore. | |
| TP - F3- cell A41 | | |
| TP - F3A- General | | |
| TP - F3A- Purpose | | |
| TP - F3A- Benefits | | |
| TP - F3A- Costs | | |
| TP - F3A- Groups | | |

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| TP - F3A- Materiality | | |
| TP - F3A- Disclosure | | |
| TP - F3A- Frequency | | |
| TP - F3A- cell A1 | | |
| TP - F3A- cell A2 | | |
| TP - F3A- cell A3 | | |
| TP - F3A- cell A4 | | |
| TP - F3A- cell A5 | | |
| TP - F3A- cell A6 | | |
| TP - F3A- cell A7 | | |
| TP - F3A- cell A8 | | |
| TP - F3A- cell A9 | | |
| TP - F3A- cell A10 | | |
| TP - F3A- cell A11 | | |
| TP - F3A- cell A12 | | |
| TP - F3A- cell A13 | | |
| TP - F3A- cell A14 | | |
| TP - F3A- cell A15 | | |
| TP - F3A- cell A16 | | |
| TP - F3B- cell A1 | | |
| TP - F3B- cell A2 | | |
| TP - F3B- cell A3 | | |
| TP - F3B- cell A4 | | |
| TP - F3B- cell A5 | | |
| TP - F3B- cell A6 | | |

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| TP - F3B- cell A7 | | |
| TP - F3B- cell A8 | | |
| TP - F3B- cell A9 | | |
| TP - F3B- cell A10 | | |
| TP - F4- General | <p>According to LOG the released annuity claims provisions (and annuity IBNR) do not fit to any column A0-A5.</p> <p>There seems to be missing a column for “Undiscounted annuity provisions released during year N”</p> | |
| TP - F4- Purpose | | |
| TP - F4- Benefits | | |
| TP - F4- Costs | | |
| TP - F4- Groups | | |
| TP - F4- Materiality | | |
| TP - F4- Disclosure | | |
| TP - F4- Frequency | | |
| TP - F4- cell A0 | | |
| TP - F4- cell A1 | Where to put undiscounted annuity claims provisions <i>released</i> during year N? | |
| TP - F4- cell A2 | | |
| TP - F4- cell A3 | | |
| TP - F4- cell A4 | | |
| TP - F4- cell A5 | | |
| TP - F4- cell B1 | | |
| TP - F4- cell C1 | | |
| TP - F4- cell D1 | | |
| TP - F4- cell A6 | | |

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|-----------------------------|--|--|
| TP - E1 & E1Q- General | | |
| TP - E1 & E1Q - Purpose | | |
| TP - E1 & E1Q - Benefits | | |
| TP - E1 & E1Q - Costs | | |
| TP - E1 & E1Q - Groups | | |
| TP - E1 & E1Q - Materiality | | |
| TP - E1 & E1Q - Disclosure | | |
| TP - E1 & E1Q - Frequency | | |
| TP - E1- cells A1-P1 | | |
| TP -E1- cellss A2-L2 | | |
| TP -E1- cellss A3-L3 | | |
| TP -E1- cellss M4-P4 | | |
| TP -E1- cellss A5-P5 | | |
| TP -E1- cellss A6-L6 | | |
| TP -E1- cellss M7-P7 | | |
| TP -E1- cellss A9-P9 | | |
| TP -E1- cells A10-P10 | | |
| TP -E1- cells A11-P11 | | |
| TP -E1- cells A12-P12 | | |
| TP -E1- cells A14-L14 | | |
| TP -E1- cells A15-L15 | | |
| TP -E1- cells M16-P16 | | |
| TP -E1- cells A18-P18 | | |
| TP -E1- cells A19-P19 | | |

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|------------------------|--|--|
| TP -E1- cells A20-P20 | | |
| TP -E1- cells A21-P21 | | |
| TP -E1- cells A25-P25 | | |
| TP -E1- cells A29-P29 | | |
| TP -E1- cells A30-P30 | | |
| TP -E1- cells A31-P31 | | |
| TP -E1- cells A32-P32 | | |
| TP -E1- cells A33-P33 | | |
| TP -E1- cells A34-P34 | We would need costly changes in the recovery process, pricing and related systems if we must separate the recourse and any recovery cash flows from the cash flows. We do the pricing based on the “net” cash flows (not splitting cash flows to out- and in-flows itself or splitting aforementioned two cash-flows to sub-groups as well). | |
| TP -E1- cells A35-P35 | We would need costly changes in the recovery process, pricing and related systems if we must separate the recourse and any recovery cash flows from the cash flows. We do the pricing based on the “net” cash flows (not splitting cash flows to out- and in-flows itself or splitting aforementioned two cash-flows to sub-groups as well). | |
| TP -E1- cells A36-P36 | We would need costly changes in the recovery process, pricing and related systems if we must separate the recourse and any recovery cash flows from the cash flows. We do the pricing based on the “net” cash flows (not splitting cash flows to out- and in-flows itself or splitting aforementioned two cash-flows to sub-groups as well). | |
| TP -E1- cellss A37-P37 | We would need costly changes in the recovery process, pricing and related systems if we must separate the recourse and any recovery cash flows from the cash flows. We do the pricing based on the “net” cash flows (not splitting cash flows to out- and in-flows itself or splitting aforementioned two cash-flows to sub-groups as well). | |
| TP -E1- cellss A38-P38 | | |
| TP -E1- cellss A39-P39 | | |
| TP -E1- cellss A40-P40 | | |
| TP -E1- cellss A41-L53 | | |

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| TP - E1 Q- cells A1-R1 | | |
| TP - E1 Q- cells A2-R2 | | |
| TP - E1 Q- cells A3-R3 | | |
| TP - E1 Q- cells A5-R5 | | |
| TP - E1 Q- cells A6-R6 | | |
| TP - E1 Q- cells A10-R10 | | |
| TP – E2- General | <p>Normal reserving method in non-life companies estimate total reserve levels. This approach would overhaul that general principle and would require drastic changes to methods currently used.</p> <p>This sheet might be of use for the supervisor if more close supervision is needed, e.g. if a company breaches some limits.</p> | |
| TP – E2- Purpose | | |
| TP – E2- Benefits | | |
| TP – E2- Costs | <p>So far the actuarial methods have been sufficient for reserve levels and worked very well. Changing to cash flow based approach requires considerable amounts of resources.</p> <p>If in and out cash flows are required separately, it will involve substantial costs for us.</p> | |
| TP – E2- Groups | | |
| TP – E2- Materiality | | |
| TP – E2- Disclosure | | |
| TP – E2- Frequency | | |
| TP - E2- cells A1-A31 | | |
| TP - E2- cells B1-B31 | | |
| TP - E2- cells C1-C31 | | |
| TP - E2- cells D1-D31 | | |
| TP - E2- cells E1-E31 | | |

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| | | |
|-----------------------|---|--|
| TP - E2- cells F1-F31 | | |
| TP – E3- General | <p>It is unclear if and how annuities should be included in this template. We suggest dropping the salvage and subrogation triangle for paid claims. For RBNS claims, these are reserved taking salvage etc into account when relevant, but no split of « gross reserve » and « salvage reserve » exists and would have to be done using keys. We do not see any advantages in doing so.</p> <p>As the purpose should not be for auditing, the template could be for a standard 10 years, and left empty for those years there is not data available, for short tailed lines.</p> <p>The claim adjustment expenses we do not currently report with the claims payments, and we do not have this information per accident year (or uw year for that matter), i.e. a process and system change would be needed. We could not get the historical data in any way.</p> <p>We have the “net” triangles of the claim payments, not the split into the 3 first triangles. What would be the specific supervisory purpose of the split?</p> <p>We use endogenous inflations mainly, which may specific per HRGs. Then you would also need the triangles per HRGs, which we certainly do not recommend. A simple yes/no answer could be sufficient at the top of the page.</p> <p>The methods used, and tail factor, is also per HRG, or even several methods within one HRG, so it must be thought about the optimal way to gather this information, if at all. We believe it is perhaps too detailed, and more suitable only for audit purposes.</p> | |
| TP – E3- Purpose | | |
| TP – E3- Benefits | | |
| TP – E3- Costs | | |
| TP – E3- Groups | | |
| TP – E3- Materiality | | |
| TP – E3- Disclosure | | |
| TP – E3- Frequency | | |
| TP - E3- cells A00 | | |

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|---|---|---|
| TP - E3- cells A01 | | |
| TP - E3- cells A02 | | |
| TP - E3- cells A03: N | | |
| TP - E3- cells A04 | | |
| TP - E3- cells A1-A15-J0 | | |
| TP - E3- cells A17-A31-J16 | We cannot split out salvage and subrogation due to limitations in our base systems. | |
| TP - E3- cells A33-A47-J32 | | |
| TP - E3- cells P1-P15-J0 | | |
| TP - E3- cells P33-P47-J32 | | |
| TP - E3- cells AE1-AE15-J0 | | |
| TP - E3- cells AE17-AE31-J0 | | |
| TP - E3- cells AE33-AE47-J0 | | |
| TP - E3- cells IH1-IE15B | | |
| TP - E4- General | <p>This template is overly ambitious and burdensome to create. All base systems do not support open and closed codes, and certainly not reopening codes. For a claim occurring in the current accident year, the claim could be closed and reopened during the same year and it would be impossible to split the payments into paid on closed and reopened claims.</p> <p>The entire form is based upon the assumption that one can distinguish open from closed claims, thus the usability of this report is highly dependent on the reserving process and systems in place; if a case reserve with a standard reserve is used, then the number of claims and closed/open status are relevant. But if such a process is not used and/or not supported by the systems, the number of claims data has poor quality even if it was available.</p> <p>In addition to this, there are lobs, like workers comp or other personal lines, where it is impossible to close a claim. We also feel that the form is too detailed, and it should not be necessary to split on open, closed and reopened claims.</p> <p>The template implies a connection between each individual claim in the base system and the corresponding amount booked in general ledger. (e.g. column 17) This connection does not exist</p> | |

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| | today, and the history is not possible to recreate. Currency: We suggest doing the entire template in converted currency. | |
| TP - E4- Purpose | | |
| TP - E4- Benefits | | |
| TP - E4- Costs | | |
| TP - E4- Groups | | |
| TP - E4- Materiality | | |
| TP - E4- Disclosure | | |
| TP - E4- Frequency | | |
| TP - E4- cells A1-A10 | | |
| TP - E4- cells B1-B10 | | |
| TP - E4- cells C1-C10 | | |
| TP - E4- cells D1-D10 | | |
| TP - E4- cells E1-E10 | | |
| TP - E4- cells F1-F10 | | |
| TP - E4- cells G1-G10 | | |
| TP - E4- cells H1-H10 | | |
| TP - E4- cells I1-I10 | | |
| TP - E4- cells J1-J10 | | |
| TP - E4- cells K1-K10 | | |
| TP - E4- cells L1-L10 | | |
| TP - E4- cells M1-M11 | | |
| TP - E4- cells N1-N11 | | |
| TP - E4- cells O1-O11 | | |

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| TP - E4- cells P1-P10 | | |
| TP - E4- cells Q1-Q10 | | |
| TP - E4- cells R1-R10 | | |
| TP - E4- cells S1-S10 | | |
| TP - E4- cells T1-T10 | | |
| TP – E6- General | <p>It should be sufficient with 10 accident years in this template.</p> <p>Other comments re this item are that the data is not readily available from all countries/systems. For example, some systems use average claim and do not have any well defined small reserve amount per claim. So we can only use the paid amount for losses that are not yet closed. Also, in other systems, only claims above some threshold (2 or 10 basbelopp) are stored individually from some reporting claim systems. This means that finding the payment amount per claim for smaller claims as at Dec 31st can be difficult, as this information is generally only recorded for the larger losses. Hence, if the claim size categories start below 10 basbelopp, there can be problems finding the exact numbers in the first categories.</p> <p>Some systems do not record case estimates, hence we can only use the payments to assess the claim size. Whereas in other systems where, in general, all open claims have a case reserve associated, and we can find the reported incurred claim cost (paid+case) for them. This means that the definition of “claim cost per loss” can be different for various systems and countries.</p> <p>Since all the figures should be reported in reporting currency, the appropriate currency rates must be applied. Finding the exact time of transaction for all paid amounts can be tricky from some systems/countries, so the amounts in reporting currency will be subject to some uncertainty.</p> <p>Some definitions must be made for this template to make sense, e.g., should zero-claims be counted? What currency principles to use? Should case estimates be added to the claim cost, and if so, from which countries/systems?</p> | |
| TP – E6- Purpose | | |

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| TP – E6- Benefits | | |
| TP – E6- Costs | | |
| TP – E6- Groups | | |
| TP – E6- Materiality | | |
| TP – E6- Disclosure | | |
| TP – E6- Frequency | | |
| TP – E6- cells A1-A20 | | |
| TP – E6- cells B1-B20 | | |
| TP – E6- cells C1-C20 | | |
| TP – E6- cells D1-D20 | | |
| TP – E6- cells E1-E20 | | |
| TP – E6- cells F1-F20 | | |
| TP – E6- cells G1-G20 | | |
| TP – E6- cells H1-H20 | | |
| TP – E6- cells I1-I20 | | |
| TP – E6- cells J1-J20 | | |
| TP – E6- cells K1-K20 | | |
| TP – E6- cells L1-L20 | | |
| TP – E6- cells AE1-AE20 | | |
| TP – E6- cells AF1-AF20 | | |
| TP – E7A- General | | |
| TP – E7A- Purpose | | |
| TP – E7A- Benefits | | |
| TP – E7A- Costs | | |

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| TP – E7A- Groups | | |
| TP – E7A- Materiality | | |
| TP – E7A- Disclosure | | |
| TP – E7A- Frequency | | |
| TP – E7A- cell A1 | | |
| TP – E7A- cell B1 | | |
| TP – E7A- cell C1 | | |
| TP – E7A- cell D1 | | |
| TP – E7A- cell E1 | | |
| TP – E7A- cell F1 | | |
| TP – E7A- cell G1 | | |
| TP – E7A- cell H1 | | |
| TP – E7A- cell I1 | | |
| TP – E7A- cell J1 | | |
| TP – E7A- cell K1 | | |
| TP – E7A- cell L1 | | |
| TP – E7A- cell M1 | | |
| TP – E7B- General | | |
| TP – E7B- Purpose | | |
| TP – E7B- Benefits | | |
| TP – E7B- Costs | | |
| TP – E7B- Groups | | |
| TP – E7B- Materiality | | |

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| TP – E7B- Disclosure | | |
| TP – E7B- Frequency | | |
| TP – E7B- cell A01 | | |
| TP – E7B- cell A1 | | |
| TP – E7B- cell B1 | | |
| TP – E7B- cell C1 | | |
| TP – E7B- cell D1 | | |
| TP – E7B- cell E1 | | |
| Re - J1- General | <p>Definition of FAC: Are Reverse Flow and Co-reinsurance programs with Limit/SI/EML for single client exceeding Treaty limit or totally outside treaty, to be regarded as facultative reinsurance and be included in this section?</p> <p>The term Facultative generally means reinsurance for one single risk as opposed to treaty which is reinsurance of portfolio. Facultative reinsurance is also commonly used as a mechanism in industrial insurance in various risk sharing solutions. These situations are because the client wishes to share the risk, and not because the “risk doesn’t fit into the regular policy acceptance of the insurance company “. Clarification needed if also captive and coinsurance risks are intended.</p> | |
| Re - J1- Purpose | | |
| Re - J1- Benefits | | |
| Re - J1- Costs | | |
| Re - J1- Groups | | |
| Re - J1- Materiality | | |
| Re - J1- Disclosure | | |
| Re - J1- Frequency | | |

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| Re - J1- cell A00 | | |
| Re - J1- cell A1 | | |
| Re - J1- cell B1 | | |
| Re - J1- cell C1 | | |
| Re - J1- cell D1 | | |
| Re - J1- cell E1 | | |
| Re - J1- cell F1 | | |
| Re - J1- cell G1 | | |
| Re - J1- cell H1 | | |
| Re - J1- cell I1 | | |
| Re - J1- cell J1 | | |
| Re - J1- cell K1 | | |
| Re - J1- cell L1 | | |
| Re - J1- cell M1 | | |
| | <p>The Solvency II statement (LOG document) is not compatible with the way in which we calculate a fire EML for properties. The essential difference is that we do <u>not</u> take in to account all factors likely to lessen the extent of the loss.</p> <p>For example, in our EML estimates no allowance is made of active fire protection systems, such as sprinkler protection. Taking in to account all factors likely to lessen the extent of the loss would be more consistent with our Normal Loss Expectancy (NLE) assessment.</p> <p>To the best of our knowledge, our method of assessing the fire loss potential to property at a site is consistent with property loss assessment techniques used by all property insurance companies.</p> <p>Although the terms EML and NLE may vary between companies, the disregard of active protection systems is a fundamental aspect of the EML assessment.</p> | |
| Re - J1- cell N1 | | |
| Re - J1- cell P1 | | |
| Re - J1- cell Q1 | | |

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| Re - J1- cell W1 | | |
| Re - J1- cell Y1 | | |
| Re - J1- cell Z1 | | |
| Re - J1- cell AB1 | Remove "reinsurance" from the definition in LOG document to make it clearer. | |
| Re - J1- cell AC1 | | |
| Re - J1- cell A01 | | |
| Re - J1- cell A11 | | |
| Re - J1- cell B11 | | |
| Re - J1- cell C11 | | |
| Re - J1- cell D11 | | |
| Re - J1- cell E11 | | |
| Re - J1- cell F11 | | |
| Re - J1- cell G11 | | |
| Re - J1- cell H11 | | |
| Re - J1- cell I11 | | |
| Re - J1- cell J11 | | |
| Re - J1- cell K11 | | |
| Re - J1- cell L11 | | |
| Re - J1- cell M11 | | |
| Re - J1- cell O11 | | |
| Re - J1- cell U11 | | |
| Re - J1- cell W11 | | |
| Re - J1- cell X11 | | |
| Re - J1- cell Z11 | | |
| Re - J1- cell AA11 | | |

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|----------------------|--|--|
| Re - J2- General | <p>Referring to treaties in the LOG document – is this really what should be reported in this template or is it all ceded reinsurance?</p> <p>Shall all ceded business be included irrespective of the size of the portfolio/risk ceded?</p> <p>Reinsurance treaties are not purchased so that 2014 treaties can be reported fully in 2013. Only estimates.</p> <p>20% materiality threshold is reasonable, however depending of the size of the treaty in question, as individual treaties may be insignificant. Rather overall 20% change.</p> <p>Report contains information that is not available in reinsurance systems and has to be manually added. As this is an extensive report it should contain information that is readily available in systems. Are risks/policies that are reinsured to captives or fronted to other insurance companies considered as program or facultative placements?</p> | |
| Re - J2- Purpose | | |
| Re - J2- Benefits | | |
| Re - J2- Costs | <p>There will be a lot of added costs if all needed data has to be added to reinsurance system (e.g. progressive sections, progressive number and quantity of surplus/layers in program, EIOPA codes and names of Reinsured, Reinsurer and Broker, Type of treaty, Catastrophic guarantees specifications).</p> | |
| Re - J2- Groups | | |
| Re - J2- Materiality | | |
| Re - J2- Disclosure | | |
| Re - J2- Frequency | | |
| Re - J2- cell A1 | | |
| Re - J2- cell B1 | | |

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| Re - J2- cell C1 | | |
| Re - J2- cell D1 | | |
| Re - J2- cell E1 | Progressive number of surplus/layer in program only works for simple structures, as only the excess point and limit in combination with program share will define the position of an agreement in a reinsurance program. Common rules need to be specified to assign numbering of surplus/layer in program. | |
| Re - J2- cell F1 | | |
| Re - J2- cell G1 | | |
| Re - J2- cell H1 | How should treaties that include several LoB's be reported. E.g. Event covers usually cover both FOP, MAT, MOC etc. | |
| Re - J2- cell I1 | | |
| Re - J2- cell J1 | | |
| Re - J2- cell K1 | | |
| Re - J2- cell L1 | | |
| Re - J2- cell M1 | | |
| Re - J2- cell N1 | | |
| Re - J2- cell O1 | See comment to Re - J1 cell N1. | |
| Re - J2- cell P1 | | |
| Re - J2- cell Q1 | | |
| Re - J2- cell R1 | | |
| Re - J2- cell S1 | | |
| Re - J2- cell T1 | | |
| Re - J2- cell U1 | | |
| Re - J2- cell V1 | | |
| Re - J2- cell W1 | | |
| Re - J2- cell X1 | | |
| Re - J2- cell Y1 | | |

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| | | |
|----------------------|---|--|
| Re - J2- cell Z1 | | |
| Re - J2- cell AA1 | What is the distinction between reinsurance commission and overriding commission? | |
| Re - J2- cell AB1 | What is the distinction between reinsurance commission and overriding commission? | |
| Re - J2- cell AC1 | | |
| Re - J2- cell AD1 | | |
| Re - J2- cell AE1 | | |
| Re - J2- cell AF1 | | |
| Re - J2- cell AG1 | | |
| Re - J2- cell AM1 | | |
| Re - J2- cell AO1 | | |
| Re - J2- cell AP1 | | |
| Re - J2- cell AQ1 | | |
| Re - J3- General | | |
| Re - J3- Purpose | | |
| Re - J3- Benefits | | |
| Re - J3- Costs | | |
| Re - J3- Groups | | |
| Re - J3- Materiality | | |
| Re - J3- Disclosure | | |
| Re - J3- Frequency | | |
| Re - J3- cell A1 | | |
| Re - J3- cell B1 | | |
| Re - J3- cell C1 | | |
| Re - J3- cell D1 | Better definitions needed. Some companies use the same legal entity for both direct insurance | |

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| | | |
|-------------------|---|--|
| | (=insurer) and assumed treaty reinsurance (=reinsurer). | |
| Re - J3- cell E1 | | |
| Re - J3- cell F1 | | |
| Re - J3- cell G1 | | |
| Re - J3- cell H1 | | |
| Re - J3- cell I1 | | |
| Re - J3- cell J1 | | |
| Re - J3- cell L1 | | |
| Re - J3- cell M1 | | |
| Re - J3- cell O1 | | |
| Re - J3- cell P1 | | |
| Re - J3- cell Q1 | | |
| Re - J3- cell R1 | | |
| SPV - General | | |
| SPV - Purpose | | |
| SPV - Benefits | | |
| SPV - Costs | | |
| SPV - Groups | | |
| SPV - Materiality | | |
| SPV - Disclosure | | |
| SPV - Frequency | | |
| SPV- cell A1 | | |
| SPV- cell B1 | | |
| SPV- cell B1A | | |

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| | | |
|---------------|---|--|
| SPV- cell C1 | | |
| SPV- cell D1 | | |
| SPV- cell E1 | | |
| SPV- cell F1 | | |
| SPV- cell F1A | | |
| SPV- cell G1 | | |
| SPV- cell H1 | | |
| SPV- cell I1 | | |
| SPV- cell J1 | | |
| SPV- cell K1 | | |
| SPV- cell L1 | | |
| SPV- cell M1 | | |
| SPV- cell N1 | | |
| SPV- cell O1 | | |
| SPV- cell P1 | | |
| SPV- cell Q1 | | |
| SPV- cell R1 | | |
| SPV- cell S1 | | |
| SPV- cell T1 | | |
| SPV- cell V1 | | |
| SPV- cell W1 | | |
| SPV- cell X1 | | |
| SPV- cell Y1 | | |
| SPV- cell Z1 | | |
| G01-Purpose | A mix of SII and IFRS items in this report. | |
| G01-Benefits | | |

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| | | |
|-----------------|---|--|
| G01-Costs | | |
| G01-Application | | |
| G01-Materiality | | |
| G01-Disclosure | | |
| G01-Frequency | | |
| G01- cell A1 | | |
| G01- cell B1 | | |
| G01- cell C1 | | |
| G01- cell D1 | | |
| G01- cell E1 | | |
| G01- cell F1 | | |
| G01- cell G1 | | |
| G01- cell H1 | SII balance sheet net of IGT (LOG) will result in an unbalanced balance sheet. Should we then use asset or liability balance? | |
| G01- cell I1 | | |
| G01- cell J1 | | |
| G01- cell K1 | | |
| G01- cell L1 | J1+K1 will not equal L1 because taxes and other "other" items will only be included in L1. | |
| G01- cell M1 | | |
| G01- cell N1 | | |
| G01- cell O1 | | |
| G01- cell P1 | | |
| G01- cell Q1 | | |
| G01- cell R1 | | |
| G01- cell S1 | | |

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| | | |
|-----------------------|--|--|
| G01- cell T1 | | |
| G01- cell U1 | | |
| G01- cell V1 | | |
| G03 & G04-Purpose | | |
| G03 & G04-Benefits | | |
| G03 & G04-Costs | | |
| G03 & G04-Application | | |
| G03 & G04-Materiality | | |
| G03 & G04-Disclosure | | |
| G03 & G04-Frequency | | |
| G03- cell A1 | | |
| G03- cell B1 | | |
| G03- cell C1 | | |
| G03- cell D1 | | |
| G03- cell E1 | | |
| G03- cell F1 | | |
| G03- cell G1 | | |
| G03- cell H1 | | |
| G03- cell I1 | | |
| G03- cell J1 | | |
| G03- cell K1 | LOG: Definition is not correct – only copied from cell J1. | |
| G03- cell L1 | | |
| G03- cell M1 | | |
| G03- cell N1 | | |
| G03- cell O1 | | |
| G03- cell P1 | | |

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| | | |
|-----------------|--|--|
| G04- cell A1 | | |
| G04- cell A2 | | |
| G04- cell B1 | | |
| G04- cell C1 | | |
| G04- cell D1 | | |
| G04- cell E1 | | |
| G14-Purpose | | |
| G14-Benefits | | |
| G14-Costs | | |
| G14-Application | | |
| G14-Materiality | | |
| G14-Disclosure | | |
| G14-Frequency | | |
| G14- cell A1 | | |
| G14- cell B1 | | |
| G14- cell C1 | | |
| G14- cell D1 | | |
| G14- cell E1 | | |
| G14- cell F1 | | |
| G14- cell G1 | | |
| G14- cell H1 | | |
| G14- cell I1 | | |
| G14- cell J1 | | |
| G14- cell K1 | | |
| G14- cell L1 | | |
| G14- cell M1 | | |

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| | | |
|--------------------------|--|--|
| G14- cell N1 | | |
| G14- cell O1 | | |
| G14- cell P1 | | |
| G14- cell Q1 | | |
| G14- cell R1 | | |
| G20-Purpose | | |
| G20-Benefits | | |
| G20-Costs | | |
| G20-Application | | |
| G20-Materiality | | |
| G20-Disclosure | | |
| G20-Frequency | | |
| G20- cell A1 | | |
| G20- cell B1 | | |
| G20- cell C1 | | |
| G20- cell D1 | | |
| G20- cell E1 | | |
| G20- cell F1 | | |
| G20- cell I1 | | |
| G20- cell J1 | | |
| G20- cell K1 | | |
| IGT1 to IGT4-Purpose | | |
| IGT1 to IGT4-Benefits | | |
| IGT1 to IGT4-Costs | | |
| IGT1 to IGT4-Application | | |
| IGT1 to IGT4-Materiality | | |

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| | | |
|-------------------------|--|--|
| IGT1 to IGT4-Disclosure | | |
| IGT1 to IGT4-Frequency | | |
| IGT1- cell B6 | | |
| IGT1- cell C6 | | |
| IGT1- cell D6 | | |
| IGT1- cell E6 | | |
| IGT1- cell F6 | | |
| IGT1- cell G6 | | |
| IGT1- cell H6 | | |
| IGT1- cell I6 | | |
| IGT1- cell J6 | | |
| IGT1- cell K6 | | |
| IGT1- cell L6 | | |
| IGT1- cell M6 | | |
| IGT1- cell N6 | | |
| IGT1- cell O6 | | |
| IGT1- cell P6 | | |
| IGT1- cell Q6 | | |
| IGT1- cell R6 | | |
| IGT1- cell S6 | | |
| IGT2- cell B6 | | |
| IGT2- cell C6 | | |
| IGT2- cell D6 | | |
| IGT2- cell E6 | | |
| IGT2- cell F6 | | |
| IGT2- cell G6 | | |

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| | | |
|---------------|--|--|
| IGT2- cell H6 | | |
| IGT2- cell I6 | | |
| IGT2- cell J6 | | |
| IGT2- cell K6 | | |
| IGT2- cell L6 | | |
| IGT2- cell M6 | | |
| IGT2- cell N6 | | |
| IGT2- cell O6 | | |
| IGT2- cell P6 | | |
| IGT2- cell Q6 | | |
| IGT2- cell R6 | | |
| IGT2- cell S6 | | |
| IGT2- cell T6 | | |
| IGT2- cell U6 | | |
| IGT2- cell V6 | | |
| IGT2- cell W6 | | |
| IGT3- cell B6 | | |
| IGT3- cell C6 | | |
| IGT3- cell D6 | | |
| IGT3- cell D6 | | |
| IGT3- cell E6 | | |
| IGT3- cell F6 | | |
| IGT3- cell G6 | | |
| IGT3- cell H6 | | |
| IGT3- cell I6 | | |
| IGT3- cell J6 | | |

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| | | |
|----------------|---|--|
| IGT3- cell K6 | | |
| IGT3- cell L6 | | |
| IGT3- cell M6 | | |
| IGT3- cell N6 | | |
| IGT3- cell O6 | | |
| IGT4- cell B5 | | |
| IGT4- cell C5 | | |
| IGT4- cell D5 | | |
| IGT4- cell E5 | | |
| IGT4- cell F5 | | |
| IGT4- cell G5 | | |
| IGT4- cell H5 | | |
| IGT4- cell I5 | | |
| IGT4- cell J5 | | |
| IGT4- cell K5 | | |
| IGT4- cell L5 | | |
| IGT4- cell M5 | Should be M6: Clarification of LOG needed. What value should be reported? | |
| IGT4- cell N5 | | |
| IGT4- cell O5 | | |
| IGT4- cell P5 | | |
| RC-Purpose | | |
| RC-Benefits | | |
| RC-Costs | | |
| RC-Application | | |
| RC-Materiality | | |
| RC-Disclosure | What does simplified version mean? | |

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| | | |
|--------------|---|--|
| RC-Frequency | | |
| RC- cell A2 | | |
| RC- cell A3 | | |
| RC- cell A4 | | |
| RC- cell A5 | | |
| RC- cell A6 | | |
| RC- cell A7 | | |
| RC- cell A8 | | |
| RC- cell A9 | | |
| RC- cell A10 | | |
| RC- cell A11 | | |
| RC- cell A12 | | |
| RC- cell A13 | What is the SII value of the exposure? Clarification needed? Is this applicable for reinsurance? | |
| RC- cell A14 | Could USD be a group currency in EU? | |
| RC- cell A15 | Definition is not clear e.g. What is max value for a derivative? Is this only applicable for reinsurance? | |
| RC- cell A16 | | |
| RC- cell A17 | | |
| RC- cell A18 | | |