

<b>Comments Template on EIOPA-CP-14-60</b> <b>Draft proposal for Implementing Technical Standards with regard to standard deviations in relation to health risk equalisation systems</b>		<b>Deadline</b> <b>02.Mar.2015</b> <b>23:59 CET</b>
Company name:	<b>AMICE</b>	
Disclosure of comments:	EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential.  Please indicate if your comments on this CP should be treated as confidential, by deleting the word Public in the column to the right and by inserting the word Confidential.	Public/Confidential
<p>Please follow the instructions for filling in the template:</p> <ul style="list-style-type: none"> <li>⇒ <u>Do not change the numbering</u> in column "Reference".</li> <li>⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph, keep the row <u>empty</u>.</li> <li>⇒ Our IT tool does not allow processing of comments which do not refer to the specific paragraph numbers below.               <ul style="list-style-type: none"> <li>○ If your comment refers to multiple paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other paragraphs this also applies.</li> <li>○ If your comment refers to sub-bullets/sub-paragraphs, please indicate this in the comment itself.</li> </ul> </li> </ul> <p><b>Please send the completed template to <a href="mailto:Consultation_Set2@eiopa.europa.eu">Consultation_Set2@eiopa.europa.eu</a>, in MSWord Format, (our IT tool does not allow processing of any other formats).</b></p> <p>The paragraph numbers below correspond to Consultation Paper No. EIOPA-CP-14-060.</p>		
Reference	Comment	
General Comment	AMICE welcomes the opportunity to comment on the Consultation Paper on the proposal for Implementing Technical Standards with regard to standard deviations in relation to health risk equalisation systems. We note a lack of transparency in the derivation of the standard deviations for premium and reserve risk. EIOPA should provide all details on the calculations performed. The HRES factor is calculated on an annual basis, but if the factor changes from year-to-year this can cause a significant change in the capital requirements. EIOPA should allow some time for implementation. We also request EIOPA to publish the premium and reserve risk factors at least 6 months before the application date. (Firms have to publish their premiums before year –end. If the premium risk factor is published after that	

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	date, firms will not be able to adjust their premiums). We therefore suggest that if the factors are published later, the premium and reserve factor would have to be applied to the year after next.	
Article 1		
Article 2		
Impact Assessment		
Appendix I		
Appendix II		