	Comments Template on **Consultation Paper on draft Implementing Technical Standards (ITS)** **on a standardised presentation format of the Insurance Product** **Information Document (IPID)**	**Deadline** **24 October 2016** **18:00 CET**
Name of Company:	GCAB – Groupement des Comparateurs en Assurance et Banque	
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	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. **Please send the completed template, in Word Format, to CP-16-007@eiopa.europa.eu.** **Our IT tool does not allow processing of any other formats.** The numbering of the questions refers to the Consultation Paper on draft Implementing Technical Standards (ITS) on a standardised presentation format of the Insurance Product Information Document (IPID)	

Template comments

Reference	Comment	
General Comment		
Question 1	No barriers, but in some countries, there could be some localization requirements, or the need for specific sections. The manufacturer should always transmit this document to the customer with its offer.	
Question 2(a)	Yes, globally speaking. A specific section, and icon, could be needed in a specific country.	
Question 2(b)		
Question 3(a)	It is a good thing to set a goal. But it depends on what will be considered as compulsory in that document, and also the complexity of the product. It would be interesting to define a goal, 2 pages, and a maximum, 4 pages, to face all the possible cases.	
Question 3(b)	Mind the mobile phones and the technical issues. The best solution would be not to prescribe a font type – leaving all the actors to work with their types - but to prescribe a font size as a model, a reference, to be close from, on all devices.	
Question 4(a)	To ensure a consistent deployment, on a lots of digital devices and offline channels, it is important that manufacturers garantee also the management of these datas, and their update – they have also to maintain monthly for each product a file containing all the information included on the IPID, on a digital format (xml for instance, and at least on a CSV standardized format).	
Question 4(b)	Consistent information on all devices.	
Question 5	To maintain and update monthly or every 3 months the data.	

Template comments

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Question 6	Yes, as a first step. But professional customers should also benefit from clear and structured information.	

Template comments