Comments Template on **Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities**	Deadline **19-Jun-13** **12:00 CET**

Name of Company:	**International Underwriting Association of London (IUA)**	
Disclosure of comments:	Please indicate if your comments should be treated as 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
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  - Leave the last column empty.
  - Please fill in your comment in the relevant row.
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      o Certain rows represent a group of cells with similar information (ex : TP-E1- cells A43-L43)
      o 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.
      o If your comment refers to subparagraphs or specific cells within a group, please indicate this in the comment itself.

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The numbering of the paragraphs refers to this Consultation Paper, the numbering of cells refers to the Technical Annexes II and III.

Reference	Comment	Resolution
General Comments	We very much agree that consistency is necessary to avert confusion and that it is necessary to ensure convergence rather than divergence. However, we are concerned that too much information may be required of insurance and reinsurance firms during the preparatory phase. At a time when all will be very busy, heavy reporting requirements for data and narrative will not be helpful to the supervisors or the firms, when much of the underlying data will not be available, the narrative will not have been thought through, requirements will still be changing and templates will not be finalized. In particular, it appears to us that Pillar 1 data will not be ready for use. The production of appropriate and useful information for groups will also be especially difficult to achieve. We suggest, therefore, that it will be more practical to require informed estimates and other alternatives forms of information and calculation. Provided that such information is treated as approximative and not used for future comparisons, we believe it would prove more useful and easier to digest.	

Introduction General Comments		
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1.11	It is not clear to us whether it will be required to submit the annual qualitatative and quantitative data on 31 December 2015, since the quarterly submissions will be required at that time.	
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1.13	Given that in the preparatory period: • internal model information will not yet be complete; • companies engaged in the internal model process will not have the standard formula data; • companies preparing the standard formula will not have all the relevant information to complete it; and • the relevant templates will not have been finalised; we suggest that granular information should not be required and that good estimates should be considered acceptable substitutes during the preparatory period.	
1.14	We believe that it will not be feasible for firms to provide useful narrative reports during the preparatory report as the information provided will have a limited shelf-life and key data will be lacking.	
1.15	Given that information will not be available, we agree that only a subset should be required.	

	Moreover, some of the information still required may not be available for the templates.	
1.16	We believe that ring-fenced information should not be demanded at the preparatory stage.	
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1.23	We believe that this would be too heavy a requirement at the preparatory stage.	
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Section I. General Comments		
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Section II. General Comments		
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1.35	Eleven months will not give firms adequate time to prepare for the threshold company requirements.	
1.36	As not all solo companies are required to report, the required information will not be available at group level.	

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Section III. General Comments		
1.47	We do not believe that it will be feasible to provide useful Pillar I information at this stage.	
1.48	We do not believe that it will be reasonable at this stage to demand standard formula calculations from firms preparing the internal model.	
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1.52	We do not believe that it will be feasible to provide useful Pillar I information at this stage.	
1.53	We do not believe that it will be feasible to provide useful Pillar I information at this stage.	
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Section IV. General Comments		
1.60	We believe that it will not be feasible for firms to provide useful narrative reports during the	

	preparatory report as the information provided will have a limited shelf-life and key data will be lacking.	
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Section V. General Comments		
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Section VI. General Comments		
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Section VII. General Comments		
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Section VIII. General Comments	Firms will be under great pressure to respond to many regulatory demands, so we suggest that NCAs should be able to fix deadlines nationally, taking into account local circumstances.	
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1.80	It is not clear to us whether QRT will be required at 31 December 2015.	

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Section IX. General Comments		
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Compliance and Reporting Rules General Comments		
1.89		
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Technical Annex I General Comments		
BI–1		
BS-C1-2		
BS-C1-3		
BS-C1D-4		
AS-D1-5		
AS-D1-6		
AS-D2O-7		
AS-D2O-8		
TP-F1-9		
TP-E1-10		
TP-F1Q-11		

TP-E1Q-12		
OF-B1Q-13		
SCR-B2A-14		
SCR-B2A-15		
SCR-B2B-16		
SCR-B2B-17		
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SCR-B2C-19		
SCR-B3A-20		
SCR-B3A-21		
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SCR-B3F-30		
SCR-B3F-31		
SCR-B3G-32		
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MCR-B4A-34		
MCR-B4B-35		
G01-36		
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G03-38		
G03-39		
G04-40		

G14-41		
Technical Annex II General Comments		
Technical Annex III General Comments		
BI - General Comments		
BI- cell A1		
BI- cell A2		
BI- cell A3		
BI- cell A4		
BI- cell A5		
BI- cell A6		
BI- cell A7		
BI- cell A8		
BI- cell A9		
BI- cell A10		
BS-C1 - General Comment		
BS-C1- cell AS1		
BS-C1- cell AS24		
BS-C1- cell A2		
BS-C1- cell A26		
BS-C1- cell A25B		
BS-C1- cell A3		
BS-C1- cell A4		
BS-C1- cell A5		
BS-C1- cell A6		
BS-C1- cell A7B		
BS-C1- cell A7		

BS-C1- cell A7A		
BS-C1- cell A8E		
BS-C1- cell A8		
BS-C1- cell A8A		
BS-C1- cell A8C		
BS-C1- cell A8D		
BS-C1- cell A9		
BS-C1- cell A10A		
BS-C1- cell A10B		
BS-C1- cell A11		
BS-C1- cell A12		
BS-C1- cell A14		
BS-C1- cell A14B		
BS-C1- cell A14C		
BS-C1- cell A14A		
BS-C1- cell A16		
BS-C1- cell A17A		
BS-C1- cell A17		
BS-C1- cell A18		
BS-C1- cell A19B		
BS-C1- cell A18A		
BS-C1- cell A19		
BS-C1- cell A19A		
BS-C1- cell A13		
BS-C1- cell A21		
BS-C1- cell A20		
BS-C1- cell A23		
BS-C1- cell A28A		
BS-C1- cell A28B		

BS-C1- cell A27		
BS-C1- cell A29		
BS-C1- cell A30	In the statutory accounts value column, the total assets (formula in A30) currently excludes the values of Goodwill and Deferred acquisition costs. These need to be included in total assets so that it equates to the statutory accounts.	
BS-C1- cell LS0		
BS-C1- cell L1		
BS-C1- cell L1A		
BS-C1- cell L2		
BS-C1- cell L3		
BS-C1- cell L4		
BS-C1- cell L4A		
BS-C1- cell L5		
BS-C1- cell L6		
BS-C1- cell LS6F		
BS-C1- cell L6B		
BS-C1- cell L6C		
BS-C1- cell L6D		
BS-C1- cell L6E		
BS-C1- cell L7		
BS-C1- cell L7A		
BS-C1- cell L8		
BS-C1- cell L9		
BS-C1- cell L10		
BS-C1- cell L10A		
BS-C1- cell L11		
BS-C1- cell L12		
BS-C1- cell LS14		
BS-C1- cell L23		

BS-C1- cell L18		
BS-C1- cell L22		
BS-C1- cell L13		
BS-C1- cell L17		
BS-C1- cell L16		
BS-C1- cell L19		
BS-C1- cell L20		
BS-C1- cell L15A		
BS-C1- cell L15B		
BS-C1- cell L15C		
BS-C1- cell L15E		
BS-C1- cell L15D		
BS-C1- cell L26		
BS-C1- cell L25		
BS-C1- cell L25A		
BS-C1- cell L27		
BS-C1D – General Comments		
BS-C1D- cell A1		
BS-C1D- cell B1		
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 A7A		
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 A15		
AS-D1- General Comment		
AS-D1- cell A1		
AS-D1- cell A2		
AS-D1- cell A3		
AS-D1- cell A4		
AS-D1- cell A5		
AS-D1- cell A6		
AS-D1- cell A7		
AS-D1- cell A8		
AS-D1- cell A9		
AS-D1- cell A10		
AS-D1- cell A11		
AS-D1- cell A12		
AS-D1- cell A13		
AS-D1- cell A15		
AS-D1- cell A16		
AS-D1- cell A17		
AS-D1- cell A18		
AS-D1- cell A20		
AS-D1- cell A22		
AS-D1- cell A23		
AS-D1- cell A24		

AS-D1- cell A25		
AS-D1- cell A26		
AS-D1- cell A28		
AS-D1- cell A30		
AS-D1- cell A50		
AS–D2O- General Comments		
AS-D2O- cell A1		
AS-D2O- cell A2		
AS-D2O- cell A3		
AS-D2O- cell A4		
AS-D2O- cell A5		
AS-D2O- cell A6		
AS-D2O- cell A7		
AS-D2O- cell A8		
AS-D2O- cell A9		
AS-D2O- cell A10		
AS-D2O- cell A11		
AS-D2O- cell A13		
AS-D2O- cell A14		
AS-D2O- cell A15		
AS-D2O- cell A16		
AS-D2O- cell A17		
AS-D2O- cell A19		
AS-D2O- cell A20		
AS-D2O- cell A21		
AS-D2O- cell A22		
AS-D2O- cell A23		
AS-D2O- cell A24		

AS-D2O- cell A25		
AS-D2O- cell A26		
AS-D2O- cell A27		
AS-D2O- cell A28		
AS-D2O- cell A29		
AS-D2O- cell A31		
AS-D2O- cell A32		
AS-D2O- cell A33		
AS-D2O- cell A34		
AS-D2O- cell A35		
AS-D2O- cell A50		
TP-F1- General Comments		
TP-F1- cell J1,J2,J4,J6,J7,J9,J10,J12,J13,J14		
TP-F1- cell JA1,JA2,JA4,JA6,JA7,JA9,JA10,JA12,JA13,JA14		
TP-F1- cell JE1,JE2,JE4,JE6,JE7,JE9,JE10,JE12,JE13,JE14		
TP-F1- cell JF1,JF2,JF4,JF6,JF7,JF9,JF10,JF12,JF13,JF14		
TP-E1- General Comments		
TP-E1- cells A43-L43		
TP-E1- cells A44-L44		
TP-E1- cells A45-L45		

TP-E1- cells A46-L46		
TP-E1- cells Q43-Q46		
TP-F1Q- General Comments		
TP-F1Q- cells A1		
TP-F1Q- cells A3		
TP-F1Q- cells A5		
TP-F1Q- cells A6		
TP-F1Q- cells A7		
TP-F1Q- cells A7A		
TP-F1Q- cells A7B		
TP-F1Q- cells A7C		
TP-F1Q- cells A9		
TP-F1Q- cells A10		
TP-F1Q- cells A12		
TP-F1Q- cells A13		
TP-F1Q- cells A14		
TP-F1Q- cells B1		
TP-F1Q- cells B2		
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TP-F1Q- cells B14		
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TP-F1Q- cells E12		
TP-F1Q- cells E13		
TP-F1Q- cells E14		
TP-F1Q- cells F1		
TP-F1Q- cells F2		
TP-F1Q- cells F4		
TP-F1Q- cells F6		
TP-F1Q- cells F7		

TP-F1Q- cells F9		
TP-F1Q- cells F10		
TP-F1Q- cells F12		
TP-F1Q- cells F13		
TP-F1Q- cells F14		
TP-E1Q- General Comments		
TP-E1Q- cells A1-P1		
TP-E1Q- cells Q1		
TP-E1Q- cells A5-P5		
TP-E1Q- cells A12-P12		
TP-E1Q- cells A13-P13		
TP-E1Q- cells Q5-Q13		
TP-E1Q- cells A14-P14		
TP-E1Q- cells A21-P21		
TP-E1Q- cells A22-P22		
TP-E1Q- cells Q14-Q22		
TP-E1Q- cells A23-P23		
TP-E1Q- cells A24-P24		
TP-E1Q- cells A25-P25		
TP-E1Q- cells Q23		
TP-E1Q- cells Q24		
TP-E1Q- cells Q25		
TP-E1Q- cells A26-P26		
TP-E1Q- cells A27-		

P27		
TP-E1Q- cells A28-P28		
TP-E1Q- cells Q26		
TP-E1Q- cells Q27		
TP-E1Q- cells Q28		
OF-B1Q – General Comments		
OF-B1Q- cell A1		
OF-B1Q- cell B1		
OF-B1Q- cell C1		
OF-B1Q- cell A1A		
OF-B1Q- cell C1A		
OF-B1Q- cell A2		
OF-B1Q- cell B2		
OF-B1Q- cell C2		
OF-B1Q- cell A3		
OF-B1Q- cell B3		
OF-B1Q- cell C3		
OF-B1Q- cell A4		
OF-B1Q- cell B4		
OF-B1Q- cell C4		
OF-B1Q- cell D4		
OF-B1Q- cell A5		
OF-B1Q- cell B5		
OF-B1Q- cell C5		
OF-B1Q- cell D5		
OF-B1Q- cell A6	The definition of Surplus funds that fall under Article 91 (2) of the Solvency II Framework Directive (Directive 2009/138.EC) needs to be further clarified. We understand it to be the retained earnings on the existing accounting basis adjusted only	

	for the solvency ii balance sheet valuation differences. Other items (such as those flowing through AOCI under US GAAP) are excluded and flow directly to the reconciliation reserve.	
OF-B1Q- cell B6		
OF-B1Q- cell A7		
OF-B1Q- cell B7		
OF-B1Q- cell A8		
OF-B1Q- cell B8		
OF-B1Q- cell C8		
OF-B1Q- cell D8		
OF-B1Q- cell A9		
OF-B1Q- cell B9		
OF-B1Q- cell C9		
OF-B1Q- cell D9		
OF-B1Q- cell A10		
OF-B1Q- cell B10		
OF-B1Q- cell C10		
OF-B1Q- cell D10		
OF-B1Q- cell A11		
OF-B1Q- cell B11		
OF-B1Q- cell C11		
OF-B1Q- cell D11		
OF-B1Q- cell A12		
OF-B1Q- cell B12		
OF-B1Q- cell A12A		
OF-B1Q- cell B12A		
OF-B1Q- cell A13		
OF-B1Q- cell B13		
OF-B1Q- cell C13		

OF–B1Q- cell D13		
OF–B1Q- cell A14		
OF–B1Q- cell B14		
OF–B1Q- cell C14		
OF–B1Q- cell D14		
OF–B1Q- cell A15		
OF–B1Q- cell D15		
OF–B1Q- cell A15A		
OF–B1Q- cell D15A		
OF–B1Q- cell A16		
OF–B1Q- cell B16		
OF–B1Q- cell B16A		
OF–B1Q- cell C16		
OF–B1Q- cell D16		
OF–B1Q- cell A17		
OF–B1Q- cell B17		
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OF–B1Q- cell C17		
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OF–B1Q- cell B18		
OF–B1Q- cell B18A		
OF–B1Q- cell C18		
OF–B1Q- cell D18		
OF–B1Q- cell A19		
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OF–B1Q- cell B19A		
OF–B1Q- cell C19		
OF–B1Q- cell D19		

OF-B1Q- cell B502		
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OF-B1Q- cell C503		
OF-B1Q- cell D503		
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OF-B1Q- cell D605		
OF-B1Q- cell E605		
OF-B1Q- cell A606		
OF-B1Q- cell B606		
OF-B1Q- cell C606		
OF-B1Q- cell D606		
OF-B1Q- cell E606		
OF-B1Q- cell A607		
OF-B1Q- cell B607		
OF-B1Q- cell C607		
OF-B1Q- cell D607		
OF-B1Q- cell E607		

OF-B1Q- cell A20		
OF-B1Q- cell B20		
OF-B1Q- cell B20A		
OF-B1Q- cell C20		
OF-B1Q- cell D20	The formula references cell F502, but this does not exist in the QRT	
OF-B1Q- cell A21	Why is the deferred tax asset (cell A15) not included in this total?	
OF-B1Q- cell B21		
OF-B1Q- cell B21A		
OF-B1Q- cell C21		
OF-B1Q- cell D21		
OF-B1Q- cell A42		
OF-B1Q- cell C42		
OF-B1Q- cell D42		
OF-B1Q- cell A43		
OF-B1Q- cell C43		
OF-B1Q- cell D43		
OF-B1Q- cell A44		
OF-B1Q- cell C44		
OF-B1Q- cell D44		
OF-B1Q- cell A46		
OF-B1Q- cell B46		
OF-B1Q- cell C46		
OF-B1Q- cell D46		
OF-B1Q- cell E46		
OF-B1Q- cell A47		
OF-B1Q- cell B47		
OF-B1Q- cell C47		
OF-B1Q- cell D47		
OF-B1Q- cell A50		

OF-B1Q- cell B50		
OF-B1Q- cell C50		
OF-B1Q- cell D50		
OF-B1Q- cell E50		
OF-B1Q- cell A51		
OF-B1Q- cell B51		
OF-B1Q- cell C51		
OF-B1Q- cell D51		
OF-B1Q- cell A52		
OF-B1Q- cell A53		
OF-B1Q- cell A45		
OF-B1Q- cell A45A		
OF-B1Q- cell A45B		
OF-B1Q- cell A45C		
OF-B1Q- cell A45D		
OF-B1Q- cell B45D		
OF-B1Q- cell C45D		
OF-B1Q- cell D45D		
OF-B1Q- cell E45D		
OF-B1Q- cell A45E		
OF-B1Q- cell B45E		
OF-B1Q- cell C45E		
OF-B1Q- cell D45E		
OF-B1Q- cell E45E		
OF-B1Q- cell A48		
OF-B1Q- cell B48		
OF-B1Q- cell C48		
OF-B1Q- cell D48		
OF-B1Q- cell E48		

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OF-B1Q- cell A50A		
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OF-B1Q- cell D50A		
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OF-B1Q- cell A52A		
OF-B1Q- cell A53A		
OF-B1Q- cell A53B		
OF-B1Q- cell B23		
OF-B1Q- cell B24		
OF-B1Q- cell B25		
OF-B1Q- cell B26		
OF-B1Q- cell B27		
OF-B1Q- cell B28		
OF-B1Q- cell B29		
OF-B1Q- cell B29A		
OF-B1Q- cell A30		
OF-B1Q- cell A31		
OF-B1Q- cell A32		
SCR - B2A – General Comment		

SCR - B2A - cell A1		
SCR - B2A - cell B1		
SCR - B2A - cell A01		
SCR - B2A - cell A2		
SCR - B2A - cell B2		
SCR - B2A - cell A02		
SCR - B2A - cell A3		
SCR - B2A - cell B3		
SCR - B2A - cell A03		
SCR - B2A - cell A4		
SCR - B2A - cell B4		
SCR - B2A - cell A04		
SCR - B2A - cell A5		
SCR - B2A - cell B5		
SCR - B2A - cell A05		
SCR - B2A - cell A6		
SCR - B2A - cell B6		
SCR - B2A - cell A7		
SCR - B2A - cell B7		
SCR - B2A - cell A07		
SCR - B2A - cell A10		
SCR - B2A - cell B10		
SCR - B2A - cell A11		
SCR - B2A - cell A12		
SCR - B2A - cell A13		
SCR - B2A - cell A013		
SCR - B2A - cell A14A		
SCR - B2A - cell A14C		
SCR - B2A - cell A8		

SCR - B2A - cell A9		
SCR - B2A - cell A17		
SCR - B2A - cell A15		
SCR - B2A - cell A15A		
SCR - B2A - cell A15B		
SCR - B2A - cell A15C		
SCR - B2A - cell A16		
SCR - B2A - cell A18		
SCR - B2A - cell A20		
SCR - B2A - cell A21		
SCR - B2A - cell A14B		
SCR - B2A - cell A14		
SCR - B2A - cell A11A		
SCR - B2A - cell A11B		
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SCR - B2B- cell A1		
SCR - B2B- cell A1A		
SCR - B2B- cell A1B		
SCR - B2B- cell A1C		
SCR - B2B- cell B1		
SCR - B2B- cell C1		
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SCR - B2B- cell C2		
SCR - B2B- cell B3		
SCR - B2B- cell C3		
SCR - B2B- cell B4		
SCR - B2B- cell C4		
SCR - B2B- cell B5		

SCR - B2B- cell B6		
SCR - B2B- cell B7		
SCR - B2B- cell C5		
SCR - B2B- cell C6		
SCR - B2B- cell B8		
SCR - B2B- cell B8AA		
SCR - B2B- cell B8A		
SCR - B2B- cell A11A		
SCR - B2B- cell A11B		
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SCR - B2C- cell A1		
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SCR - B2C- cell A1B		
SCR - B2C- cell A1C		
SCR - B2C- cell B1		
SCR - B2C- cell C1		
SCR - B2C- cell B2		
SCR - B2C- cell C2		
SCR - B2C- cell B3		
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SCR - B2C- cell B6		
SCR - B2C- cell B7		
SCR - B2C- cell B7A		
SCR - B2C- cell B7B		
SCR - B2C- cell B7C		

SCR - B2C- cell B8		
SCR - B2C- cell B9		
SCR - B2C- cell B10		
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SCR - B2C- cell B13		
SCR - B2C- cell C5		
SCR - B2C- cell C6		
SCR - B2C- cell B14		
SCR - B2C- cell B14AA		
SCR - B2C- cell B14A		
SCR - B2C- cell A11A		
SCR - B2C- cell A11B		
SCR - B3A – General Comment		
SCR - B3A – cell A00		
SCR - B3A – cell AA01		
SCR - B3A – cell AA02		
SCR - B3A – cell AA03		
SCR - B3A – cel A30		
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SCR - B3A- cell D0		
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SCR - B3A- cell A2A		
SCR - B3A- cell B1		
SCR - B3A- cell B2		
SCR - B3A- cell B1A		
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SCR - B3A- cell C1		
SCR - B3A- cell C2		
SCR - B3A- cell B1B		
SCR - B3A- cell B2B		
SCR - B3A- cell D1		
SCR - B3A- cell D2		
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SCR - B3A- cell C4		
SCR - B3A- cell B4B		
SCR - B3A- cell D4		
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SCR - B3A- cell A6		
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SCR - B3A- cell A7		
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SCR - B3A- cell A12A		
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SCR - B3F- cell KF1		
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SCR - B3F- cell KF6		
SCR - B3F- cell KF7		
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SCR - B3F- cell KC9		
SCR - B3F- cell KA10		
SCR - B3F- cell KB10		
SCR - B3F- cell KC10		
SCR - B3F- cell LA1-LB1		
SCR - B3F- cell LC1		
SCR - B3F- cell LA2-LB2		
SCR - B3F- cell LC2		
SCR - B3F- cell LA3-LB3		
SCR - B3F- cell LC3		
SCR - B3F- cell LA4-LB4		
SCR - B3F- cell LC4		
SCR - B3F- cell LA5-LB5		
SCR - B3F- cell LC5		
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SCR - B3F- cell LC6		
SCR - B3F- cell LA7		
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SCR - B3F- cell LA9		
SCR - B3F- cell LA10		
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SCR - B3F- cell LC12		
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SCR - B3F- cell MA2-ME2		
SCR - B3F- cell MF2		
SCR - B3F- cell MG2		
SCR - B3F- cell MH2		
SCR - B3F- cell MF3		
SCR - B3F- cell MG3		
SCR - B3F- cell MH3		
SCR - B3F- cell MF4		
SCR - B3F- cell MG4		
SCR - B3F- cell MH4		
SCR - B3F- cell NA1,NC1,NE1,NG1,NI1		

SCR - B3F- cell NB1,ND1,NF1,NH1,NJ1		
SCR - B3F- cell NK1		
SCR - B3F- cell NK32		
SCR - B3F- cell NK33		
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SCR - B3F- cell NL1		
SCR - B3F- cell NL32		
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SCR - B3F- cell OA1		
SCR - B3F- cell OB1,OC1,OD1,OE1,OF1		
SCR - B3F- cell OG1		
SCR - B3F- cell OG21		
SCR - B3F- cell OG22		
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SCR - B3F- cell OH1		
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SCR - B3F- cell OI1		
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SCR - B3F- cell OJ1		
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SCR - B3F- cell OJ23		
SCR - B3F- cell PA21		
SCR - B3F- cell PB21		
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SCR - B3F- cell PE1, PG1, PI1		
SCR - B3F- cell PJ1		
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