

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> <li>- Do not change the numbering in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool</li> <li>- Please do not insert or delete any row. If you have no comment on a paragraph or a cell, keep the row empty.</li> <li>- Leave the last column empty.</li> <li>- Please fill in your comment in the relevant row.</li> <li>- Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <ul style="list-style-type: none"> <li>o Certain rows represent a group of cells with similar information (ex : TP-E1- cells A43-L43)</li> <li>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.</li> <li>o If your comment refers to subparagraphs or specific cells within a group, please indicate this in the comment itself.</li> </ul> </li> </ul> <p>Please send the completed template, in Word Format, to <a href="mailto:CP-13-010@eiopa.europa.eu">CP-13-010@eiopa.europa.eu</a>. 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 Technical Annexes II and III.</p>		
<b>Reference</b>	<b>Comment</b>	<b>Resolution</b>
<b>General Comments</b>	The Insurance Industry is incurring significant expense due to Solvency II. During the period up to Solvency II implementation, insurers will be developing their end state Solvency II solutions as well as undertaking the existing Solvency I reporting. The requirement to report the additional information required by the consultation paper will lead to significant additional costs and burden on the staff.	
<b>Introduction General Comments</b>		
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1,6	<p>We understand and endorse the view that undertakings should take steps towards implementing aspects of Solvency II so they can be fully compliant when it comes into effect. We would note however that application of the Interim Measures is tied to the Solvency II implementation date, a date that remains unclear. In the absence of such clarity, certain requirements within the Guidelines pose significant challenges.</p> <p>-Our preparatory work in compliance with these Guidelines may persist for longer than initially expected, thus putting further strain on expenses and resources. We recommend avoiding swift or overly onerous demands in the early part of the preparatory phase and recommend instead a phased-in approach allowing undertakings to ensure they are moving in the right direction without placing undue stress on the business.</p>	

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1,7		
1,8		
1,9	<p>We are concerned about the level of simultaneous disclosure required of us in the absence of clear dates for transition to Solvency II. Generating the quantitative and qualitative disclosures set out in the Interim Measures, in parallel with existing requirements under Solvency I, will have a substantial financial impact and cause significant resource constraints during peak reporting periods. They could even undermine existing Solvency I reporting, particularly in the absence of a final implementation date for Solvency II. Instead, we propose that during the interim period, each undertaking is required to project and stress test capital requirements on a Solvency I basis until such time as Omnibus II has been agreed.</p> <p>We believe it may be more practical if undertakings were asked to report under the Interim Measures during off-cycle periods. This would demonstrate that undertakings were making progress towards Solvency II while minimising disruption to the existing reporting cycle. Greater flexibility around submission deadlines could also prove helpful.</p> <p>We further believe the implementation of group reporting should be deferred until Solvency II comes into force. First, NCAs may adopt different approaches to solo reporting, given their ability to introduce differing or additional requirements from those proposed in the Guidelines. Second, it is highly likely that some solo entities will not come within scope of these measures. As a result, the group consolidation process could become extremely complicated, which would be unhelpful during this preparatory phase.</p>	
1.10		
1,11	<p>To support the development, it is critical that detailed regulations including the measures for long term guarantees and other elements of the directive, Level 2 and Level 3 text are fully agreed in a timely fashion long before the first reporting on the interim measures. These should be concluded at least 12 months before the first set of interim reporting is required, (i.e. by end of 2013).</p> <p>The proposal should be explicit regarding whether the interim measures annual reporting will be required for the 31 December 2015 year end.</p>	
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1,13	The requirement to report additional standard formula figures for risks that are proposed to be valued using an internal model will increase costs for insurers. However we have developed this capability and will be able to provide this information if it is required.	
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Name of Company:	MetLife	
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1,23	See Comment 1.13	
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<b>Section I. General Comments</b>		
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1,27	See Comment 1.7	
1,28		
<b>Section II. General Comments</b>		
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1,31		
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1,35	See Comment 1.11	
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1,47	We understand from the July 2012 release that those QRTs were near their final state so we have focused our comments here on the QRTs required for Interim Measures.  See Comment 1.11	
1,48	See Comment 1.13	
<b>Section III. General Comments</b>		
1,49		

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Name of Company:	MetLife	
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1,53	See Comment 1.13	
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1,55	See Comment 1.13	
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<b>Section IV. General Comments</b>	We believe there should be no duplication of disclosures already included in the ORSA. We would hope that EIOPA supports our point of view but we are concerned that the Interim Measures do not provide clear guidance in this area.	
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1.70	<p>We appreciate the exemption from presenting the Statutory Accounts balances on BS-C1 for those undertakings not generating Group Financial Statements (availing of the exemption under EU Directive) . Does this exemption also apply to the explanation of material differences in valuation for solvency purposes and valuation in financial statements required under the narrative guidelines?</p> <p>Given that both IFRS and US GAAP have a three-level hierarchy on valuation, we question the relevance and significance of introducing a four-level hierarchy. This will have significant cost implications as systems and processes will require updates. As substantially all the industry players are prioritising QRT reporting and had not been planning for SFCR/ RSR given the uncertainty around the Solvency II implementation dates, we are concerned that this requirement may require a relatively longer lead in time. Also, it will make the disclosures different to that produced under IFRS and US GAAP</p>	
<b>Section V. General Comments</b>		

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Name of Company:	MetLife	
1,71	In our opinion the level of narrative is far too detailed for pre-Solvency II reporting. In particular, we do not believe that it should be necessary to provide the comparisons with financial statements as requested in 1.71 (c)(See comment 1.70) or the description of the level of uncertainty in 1.71 (b).	
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<b>Section VI. General Comments</b>		
1,73	See comment 1.70	
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1,79	<p>We advocate a more gradual approach with regard to Supervisory Reporting. The current proposals suggest that undertakings that fall within certain categories must submit annual quantitative information for 2014 within 20 weeks of their year end, which implies a May deadline for companies with a calendar year end, such as MetLife. Separately, the Guidelines state that NCAs need to inform undertakings at least 11 months in advance about whether they fall into the categories required to submit such information.</p> <p>We believe these timelines do not provide sufficient time to ensure all our business units are ready, given that the Solvency II implementation date also remains unclear.</p>	
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<b>Section VII. General Comments</b>		
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<b>Section VIII. General Comments</b>		
1,82	<p>See Comment 1.9</p> <p>It should be confirmed that the EEA Group Narrative Report will have additional time over the Solo requirements.</p>	
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1,85	Implementing XBRL taxonomy will be a cumbersome exercise that will need to be embedded into the reporting systems. We believe the requirements for XBRL (incl taxonomy) should be made available sooner rather than later	
1,86		
<b>Section IX. General Comments</b>		

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Name of Company:	MetLife	
1,87	Please clarify what is meant by "submitted in units" . Reporting in the lowest denomination would be burdensome without being of much usefulness to the users.	
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<b>Compliance and Reporting Rules General Comments</b>		
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<b>Technical Annex I General Comments</b>		
BI-1	Undertakings need to be certain that the reporting requirements will not be altered once the Guidelines have been published to avoid potential duplication of effort.	
BS-C1-2		
BS-C1-3		
BS-C1D-4	As this template will be difficult and cumbersome to report at a group level, we welcome the decision to require it only for Solo reporting. We believe the same should apply post Solvency II Implementation.	
AS-D1-5		
AS-D1-6	We welcome the change in treatment of participations in other financial sectors. We suggest this continue to be applicable once SII is implemented.	
AS-D20-7		
AS-D20-8		
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		
SCR-B2C-18		
SCR-B2C-19		
SCR-B3A-20		

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Name of Company:	MetLife	
SCR-B3A-21		
SCR-B3B-22		
SCR-B3B-23		
SCR-B3C-24		
SCR-B3C-25		
SCR-B3D-26		
SCR-B3D-27		
SCR-B3E-28		
SCR-B3E-29		
SCR-B3F-30		
SCR-B3F-31		
SCR-B3G-32		
SCR-B3G-33		
MCR-B4A-34		
MCR-B4B-35		
G01-36		
G03-37		
G03-38		
G03-39		
G04-40		
G14-41		
<b>Technical Annex II General Comments</b>		
<b>Technical Annex III General Comments</b>	Whilst comparing the QRTs in this appendix to those released in July 2012 we identified a number of changes (in addition to the elements highlighted as not being required for the purpose of the	
<b>BI - General Comments</b>		
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		
<b>BS-C1 - General Comment</b>	Cell references for Statutory Accounts Value should include an S to differentiate the cells from the Solvency II value cells.	
BS-C1- cell AS1		

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Name of Company:	MetLife	
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		



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Name of Company:	MetLife	
BS-C1- cell A27		
BS-C1- cell A29		
BS-C1- cell A30		
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		

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Name of Company:	MetLife	
BS-C1- cell L26		
BS-C1- cell L25		
BS-C1- cell L25A		
BS-C1- cell L27		
<b>BS-C1D – General Comments</b>		
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		
<b>AS-D1- General Comment</b>		
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	<p>We welcome the change from NACE to GICS and the publication of the closed list - we assume this is intended to be applicable for both the preparatory phase and post Solvency II implementation</p> <p>Please confirm if EIOPA is expecting an issuer section for cash and for property?</p>	
AS-D1- cell A10		
AS-D1- cell A11		
AS-D1- cell A12		

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Name of Company:	MetLife	
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	For Asset Category 8X Loans to individuals, is maturity date required when reporting/aggregating multiple loans in one line?	
AS-D1- cell A30		
AS-D1- cell A50		
<b>AS-D20- General Comments</b>		
AS-D20- cell A1		
AS-D20- cell A2		
AS-D20- cell A3		
AS-D20- cell A4		
AS-D20- cell A5		
AS-D20- cell A6		
AS-D20- cell A7		
AS-D20- cell A8		
AS-D20- cell A9		
AS-D20- cell A10		
AS-D20- cell A11		
AS-D20- cell A13		
AS-D20- cell A14		
AS-D20- cell A15		
AS-D20- cell A16		
AS-D20- cell A17		
AS-D20- cell A19		
AS-D20- cell A20		
AS-D20- cell A21		
AS-D20- cell A22		
AS-D20- cell A23		
AS-D20- cell A24		
AS-D20- cell A25		

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Name of Company:	MetLife	
AS-D20- cell A26		
AS-D20- cell A27		
AS-D20- cell A28		
AS-D20- cell A29		
AS-D20- cell A31		
AS-D20- cell A32		
AS-D20- cell A33		
AS-D20- cell A34		
AS-D20- cell A35		
AS-D20- cell A50		
<b>TP-F1- General Comments</b>		
TP-F1- cell J1,J2,J4,J6,J7,J9,J10,J12,J13,J14		
TP-F1- cell JA1,JA2,JA4,JA6,JA7,JA9,JA10,JA12,J A13,JA14		
TP-F1- cell JE1,JE2,JE4,JE6,JE7,JE9,JE10,JE12,JE 13,JE14		
TP-F1- cell JF1,JF2,JF4,JF6,JF7,JF9,JF10,JF12,JF1 3,JF14		
<b>TP-E1- General Comments</b>		
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		
<b>TP-F1Q- General Comments</b>		
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		

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Name of Company:	MetLife	
TP-F1Q- cells A10		
TP-F1Q- cells A12		
TP-F1Q- cells A13		
TP-F1Q- cells A14		
TP-F1Q- cells B1		
TP-F1Q- cells B2		
TP-F1Q- cells B3		
TP-F1Q- cells B4		
TP-F1Q- cells B5		
TP-F1Q- cells B6		
TP-F1Q- cells B7		
TP-F1Q- cells B9		
TP-F1Q- cells B10		
TP-F1Q- cells B11		
TP-F1Q- cells B12		
TP-F1Q- cells B13		
TP-F1Q- cells B14		
TP-F1Q- cells C1		
TP-F1Q- cells C2		
TP-F1Q- cells C3		
TP-F1Q- cells C4		
TP-F1Q- cells C5		
TP-F1Q- cells C6		
TP-F1Q- cells C7		
TP-F1Q- cells C9		
TP-F1Q- cells C10		
TP-F1Q- cells C11		
TP-F1Q- cells C12		
TP-F1Q- cells C13		
TP-F1Q- cells C14		
TP-F1Q- cells E1		
TP-F1Q- cells E2		
TP-F1Q- cells E4		
TP-F1Q- cells E6		
TP-F1Q- cells E7		
TP-F1Q- cells E9		
TP-F1Q- cells E10		
TP-F1Q- cells E12		
TP-F1Q- cells E13		

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Name of Company:	MetLife	
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		
<b>TP-E1Q- General Comments</b>		
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		
<b>OF-B1Q – General Comments</b>		
OF-B1Q- cell A1		
OF-B1Q- cell B1		
OF-B1Q- cell C1		
OF-B1Q- cell A1A		

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Name of Company:	MetLife	
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		
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		
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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		

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Name of Company:	MetLife	
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		
OF-B1Q- cell B17A		
OF-B1Q- cell C17		
OF-B1Q- cell D17		
OF-B1Q- cell A18		
OF-B1Q- cell B18		
OF-B1Q- cell B18A		
OF-B1Q- cell C18		
OF-B1Q- cell D18		
OF-B1Q- cell A19		
OF-B1Q- cell B19		
OF-B1Q- cell B19A		
OF-B1Q- cell C19		
OF-B1Q- cell D19		
OF-B1Q- cell B502		
OF-B1Q- cell A503		
OF-B1Q- cell B503		
OF-B1Q- cell C503		
OF-B1Q- cell D503		
OF-B1Q- cell A603		
OF-B1Q- cell B603		



<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
OF-B1Q- cell C603		
OF-B1Q- cell D603		
OF-B1Q- cell A604		
OF-B1Q- cell B604		
OF-B1Q- cell C604		
OF-B1Q- cell D604		
OF-B1Q- cell E604		
OF-B1Q- cell A605		
OF-B1Q- cell B605		
OF-B1Q- cell C605		
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		
OF-B1Q- cell A21		
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		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
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		

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	MetLife	
OF-B1Q- cell D48		
OF-B1Q- cell E48		
OF-B1Q- cell A49		
OF-B1Q- cell B49		
OF-B1Q- cell C49		
OF-B1Q- cell D49		
OF-B1Q- cell A50A		
OF-B1Q- cell B50A		
OF-B1Q- cell C50A		
OF-B1Q- cell D50A		
OF-B1Q- cell E50A		
OF-B1Q- cell A51A		
OF-B1Q- cell B51A		
OF-B1Q- cell C51A		
OF-B1Q- cell D51A		
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		
<b>SCR - B2A - General Comment</b>		
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		

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	MetLife	
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		
<b>SCR - B2B – General Comment</b>		
SCR - B2B- cell A1		
SCR - B2B- cell A1A		
SCR - B2B- cell A1B		
SCR - B2B- cell A1C		

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	MetLife	
SCR - B2B- cell B1		
SCR - B2B- cell C1		
SCR - B2B- cell B2		
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		
<b>SCR - B2C - General Comment</b>		
SCR - B2C- cell A1		
SCR - B2C- cell A1A		
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		
SCR - B2C- cell C3		
SCR - B2C- cell B4		
SCR - B2C- cell C4		
SCR - B2C- cell B5		
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		

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	MetLife	
SCR - B2C- cell B10		
SCR - B2C- cell B12		
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		
<b>SCR - B3A - General Comment</b>		
SCR - B3A - cell A00		
SCR - B3A - cell AA01		
SCR - B3A - cell AA02		
SCR - B3A - cell AA03		
SCR - B3A - cel A30		
SCR - B3A- cell C0		
SCR - B3A- cell D0		
SCR - B3A- cell A1		
SCR - B3A- cell A2		
SCR - B3A- cell A1A		
SCR - B3A- cell A2A		
SCR - B3A- cell B1		
SCR - B3A- cell B2		
SCR - B3A- cell B1A		
SCR - B3A- cell B2A		
SCR - B3A- cell C1		
SCR - B3A- cell C2		
SCR - B3A- cell B1B		
SCR - B3A- cell B2B		
SCR - B3A- cell D1		
SCR - B3A- cell D2		
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		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
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 C8		
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		
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		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
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		
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 C22		
SCR - B3A- cell D22		
SCR - B3A- cell C23		
SCR - B3A- cell D23		
<b>SCR - B3B – General Comment</b>		
SCR - B3B – cell A00		
SCR - B3B – cell A001		
SCR - B3B – cell A30		
SCR - B3B – cell A10		
SCR - B3B- cell A1		



<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	MetLife	
SCR - B3B- cell B1		
SCR - B3B- cell C0		
SCR - B3B- cell C1		
SCR - B3B- cell A2		
SCR - B3B- cell A3		
SCR - B3B- cell C3		
SCR - B3B- cell D4		
SCR - B3B- cell C4		
<b>SCR - B3C - General Comment</b>		
SCR - B3C - cell A01		
SCR - B3C - cell A02		
SCR - B3C - cell A03		
SCR - B3C - cell A04		
SCR - B3C - cell A05		
SCR - B3C - cell A06		
SCR - B3C - cell A001		
SCR - B3C - cell A30		
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		
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		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>	<b>Deadline 19. Jun 13 12:00 CET</b>
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Name of Company:	MetLife
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	
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	

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	MetLife	
SCR - B3C- cell B9A		
SCR - B3C- cell C9		
SCR - B3C- cell B9B		
SCR - B3C- cell D9		
SCR - B3C- cell C10		
SCR - B3C- cell D10		
SCR - B3C- cell C11		
SCR - B3C- cell D11		
<b>SCR - B3D – General Comment</b>		
SCR - B3D – cell A01		
SCR - B3D – cell A02		
SCR - B3D – cell A03		
SCR - B3D – cell A04		
SCR - B3D – cell A05		
SCR - B3C – cell A001		
SCR - B3C – cell A30		
SCR - B3D- cell A1		
SCR - B3D- cell A1A		
SCR - B3D- cell B1		
SCR - B3D- cell B1A		
SCR - B3D- cell C1		
SCR - B3D- cell B1B		
SCR - B3D- cell D1		
SCR - B3D- cell A2		
SCR - B3D- cell A2A		
SCR - B3D- cell B2		
SCR - B3D- cell B2A		
SCR - B3D- cell C2		
SCR - B3D- cell B2B		
SCR - B3D- cell D2		
SCR - B3D- cell A3		
SCR - B3D- cell A3A		
SCR - B3D- cell B3		
SCR - B3D- cell B3A		
SCR - B3D- cell C3		
SCR - B3D- cell B3B		
SCR - B3D- cell D3		
SCR - B3D- cell C04		
SCR - B3D- cell D04		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
SCR - B3D- cell A4		
SCR - B3D- cell A4A		
SCR - B3D- cell B4		
SCR - B3D- cell B4A		
SCR - B3D- cell C4		
SCR - B3D- cell B4B		
SCR - B3D- cell D4		
SCR - B3D- cell A5		
SCR - B3D- cell A5A		
SCR - B3D- cell B5		
SCR - B3D- cell B5A		
SCR - B3D- cell C5		
SCR - B3D- cell B5B		
SCR - B3D- cell D5		
SCR - B3D- cell A6		
SCR - B3D- cell A6A		
SCR - B3D- cell B6		
SCR - B3D- cell B6A		
SCR - B3D- cell C6		
SCR - B3D- cell B6B		
SCR - B3D- cell D6		
SCR - B3D- cell A7		
SCR - B3D- cell A7A		
SCR - B3D- cell B7		
SCR - B3D- cell B7A		
SCR - B3D- cell C7		
SCR - B3D- cell B7B		
SCR - B3D- cell D7		
SCR - B3D- cell A8		
SCR - B3D- cell A8A		
SCR - B3D- cell B8		
SCR - B3D- cell B8A		
SCR - B3D- cell C8		
SCR - B3D- cell B8B		
SCR - B3D- cell D8		
SCR - B3D- cell C9		
SCR - B3D- cell D9		
SCR - B3D- cell C10		
SCR - B3D- cell D10		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
SCR - B3D- cell C12		
SCR - B3D- cell D12		
SCR - B3D- cell E12		
SCR - B3D- cell F12		
SCR - B3D- cell C13		
SCR - B3D- cell D13		
SCR - B3D- cell E13		
SCR - B3D- cell F13		
SCR - B3D- cell C14		
SCR - B3D- cell D14		
SCR - B3D- cell E14		
SCR - B3D- cell F14		
SCR - B3D- cell C15		
SCR - B3D- cell D15		
SCR - B3D- cell E15		
SCR - B3D- cell F15		
SCR - B3D- cell A16		
SCR - B3D- cell F16		
SCR - B3D- cell A17		
SCR - B3D- cell A18		
SCR - B3D- cell A18A		
SCR - B3D- cell B18		
SCR - B3D- cell B18B		
SCR - B3D- cell D18		
SCR - B3D- cell D19		
SCR - B3D- cell D20		
SCR - B3D- cell B21		
SCR - B3D- cell A21		
SCR - B3D- cell B22		
SCR - B3D- cell A22		
SCR - B3D- cell B23		
SCR - B3D- cell A23		
SCR - B3D- cell B24		
SCR - B3D- cell A24		
SCR - B3D- cell B25		
SCR - B3D- cell A25		
SCR - B3D- cell B26		
SCR - B3D- cell A26		
SCR - B3D- cell B27		

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:	MetLife	
SCR - B3D- cell A27		
<b>SCR - B3E – General Comment</b>		
SCR - B3E- cell A001		
SCR - B3E- cell A30		
SCR - B3E- cell C1		
SCR - B3E- cell D1		
SCR - B3E- cell E1		
SCR - B3E- cell F1		
SCR - B3E- cell C2		
SCR - B3E- cell D2		
SCR - B3E- cell E2		
SCR - B3E- cell F2		
SCR - B3E- cell C3		
SCR - B3E- cell D3		
SCR - B3E- cell E3		
SCR - B3E- cell F3		
SCR - B3E- cell C4		
SCR - B3E- cell D4		
SCR - B3E- cell E4		
SCR - B3E- cell F4		
SCR - B3E- cell C5		
SCR - B3E- cell D5		
SCR - B3E- cell E5		
SCR - B3E- cell F5		
SCR - B3E- cell C6		
SCR - B3E- cell D6		
SCR - B3E- cell E6		
SCR - B3E- cell F6		
SCR - B3E- cell C7		
SCR - B3E- cell D7		
SCR - B3E- cell E7		
SCR - B3E- cell F7		
SCR - B3E- cell C8		
SCR - B3E- cell D8		
SCR - B3E- cell E8		
SCR - B3E- cell F8		
SCR - B3E- cell C9		
SCR - B3E- cell D9		
SCR - B3E- cell E9		

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	MetLife	
SCR - B3E- cell F9		
SCR - B3E- cell C10		
SCR - B3E- cell D10		
SCR - B3E- cell E10		
SCR - B3E- cell F10		
SCR - B3E- cell C11		
SCR - B3E- cell D11		
SCR - B3E- cell E11		
SCR - B3E- cell F11		
SCR - B3E- cell C12		
SCR - B3E- cell D12		
SCR - B3E- cell E12		
SCR - B3E- cell F12		
SCR - B3E- cell A13		
SCR - B3E- cell F13		
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		
<b>SCR - B3F – General Comment</b>		
SCR - B3F- cell A1		
SCR - B3F- cell A2-A6		
SCR - B3F- cell A7		
SCR - B3F- cell B1		
SCR - B3F- cell B2-B6		
SCR - B3F- cell B7		
SCR - B3F- cell C1		
SCR - B3F- cell C2-C6		
SCR - B3F- cell C7		
SCR - B3F- cell A8		
SCR - B3F- cell B8		
SCR - B3F- cell C8		
SCR - B3F- cell A9		
SCR - B3F- cell A10-A15		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
SCR - B3F- cell A16		
SCR - B3F- cell B9		
SCR - B3F- cell B10-B15		
SCR - B3F- cell B16		
SCR - B3F- cell C9		
SCR - B3F- cell C10-C15		
SCR - B3F- cell C16		
SCR - B3F- cell A17		
SCR - B3F- cell A18		
SCR - B3F- cell B17		
SCR - B3F- cell B18		
SCR - B3F- cell C17		
SCR - B3F- cell C18		
SCR - B3F- cell A19		
SCR - B3F- cell A20		
SCR - B3F- cell A21		
SCR - B3F- cell B19		
SCR - B3F- cell B20		
SCR - B3F- cell B21		
SCR - B3F- cell C19		
SCR - B3F- cell C20		
SCR - B3F- cell C21		
SCR - B3F- cell A22		
SCR - B3F- cell A23-A25		
SCR - B3F- cell A26		
SCR - B3F- cell B22		
SCR - B3F- cell B23-B25		
SCR - B3F- cell B26		
SCR - B3F- cell C22		
SCR - B3F- cell C23-C25		
SCR - B3F- cell C26		
SCR - B3F- cell AA1-AA20		
SCR - B3F- cell AA21		
SCR - B3F- cell AA22-AA35		
SCR - B3F- cell AA36		
SCR - B3F- cell AA37		
SCR - B3F- cell AB1-AB20		
SCR - B3F- cell AB21		
SCR - B3F- cell AB22-AB35		



<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
SCR - B3F- cell AB36		
SCR - B3F- cell AB37		
SCR - B3F- cell AC1-AC20		
SCR - B3F- cell AC21		
SCR - B3F- cell AD1-AD20		
SCR - B3F- cell AD21		
SCR - B3F- cell AE1-AE20		
SCR - B3F- cell AF1-AF20		
SCR - B3F- cell AF21		
SCR - B3F- cell AF36		
SCR - B3F- cell AF37		
SCR - B3F- cell AF38		
SCR - B3F- cell AF39		
SCR - B3F- cell AG1-AG20		
SCR - B3F- cell AG21		
SCR - B3F- cell AG36		
SCR - B3F- cell AG37		
SCR - B3F- cell AH1-AH20		
SCR - B3F- cell AH21		
SCR - B3F- cell AH36		
SCR - B3F- cell AH37		
SCR - B3F- cell AI1-AI20		
SCR - B3F- cell AI21		
SCR - B3F- cell AI36		
SCR - B3F- cell AI37		
SCR - B3F- cell AI38		
SCR - B3F- cell AI39		
SCR - B3F- cell BA1-BA20		
SCR - B3F- cell BA21		
SCR - B3F- cell BA22-BA35		
SCR - B3F- cell BA36		
SCR - B3F- cell BA37		
SCR - B3F- cell BB1-BB20		
SCR - B3F- cell BB21		
SCR - B3F- cell BB22-BB35		
SCR - B3F- cell BB36		
SCR - B3F- cell BB37		
SCR - B3F- cell BC1-BC20		
SCR - B3F- cell BC21		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
SCR - B3F- cell BD1-BD20		
SCR - B3F- cell BD21		
SCR - B3F- cell BE1-BE20		
SCR - B3F- cell BE21		
SCR - B3F- cell BE36		
SCR - B3F- cell BE37		
SCR - B3F- cell BE38		
SCR - B3F- cell BE39		
SCR - B3F- cell BF1-BF20		
SCR - B3F- cell BF21		
SCR - B3F- cell BF36		
SCR - B3F- cell BF37		
SCR - B3F- cell BG1-BG20		
SCR - B3F- cell BG21		
SCR - B3F- cell BG36		
SCR - B3F- cell BG37		
SCR - B3F- cell BH1-BH20		
SCR - B3F- cell BH21		
SCR - B3F- cell BH36		
SCR - B3F- cell BH37		
SCR - B3F- cell BH38		
SCR - B3F- cell BH39		
SCR - B3F- cell CA1-CA14		
SCR - B3F- cell CA15		
SCR - B3F- cell CA16-CA29		
SCR - B3F- cell CA30		
SCR - B3F- cell CA31		
SCR - B3F- cell CB1-CB14		
SCR - B3F- cell CB15		
SCR - B3F- cell CB16-CB29		
SCR - B3F- cell CB30		
SCR - B3F- cell CB31		
SCR - B3F- cell CC1-CC14		
SCR - B3F- cell CC15		
SCR - B3F- cell CD1-CD14		
SCR - B3F- cell CD15		
SCR - B3F- cell CE1-CE14		
SCR - B3F- cell CF1-CF14		
SCR - B3F- cell CF15		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
SCR - B3F- cell CF30		
SCR - B3F- cell CF31		
SCR - B3F- cell CF32		
SCR - B3F- cell CF33		
SCR - B3F- cell CG1-CG14		
SCR - B3F- cell CG15		
SCR - B3F- cell CG30		
SCR - B3F- cell CG31		
SCR - B3F- cell CH1-CH14		
SCR - B3F- cell CH15		
SCR - B3F- cell CH30		
SCR - B3F- cell CH31		
SCR - B3F- cell CI1-CI14		
SCR - B3F- cell CI15		
SCR - B3F- cell CI30		
SCR - B3F- cell CI31		
SCR - B3F- cell CI32		
SCR - B3F- cell CI33		
SCR - B3F- cell DA1-DA9		
SCR - B3F- cell DA10		
SCR - B3F- cell DA11-DA24		
SCR - B3F- cell DA25		
SCR - B3F- cell DA26		
SCR - B3F- cell DB1-DB9		
SCR - B3F- cell DB10		
SCR - B3F- cell DB11-DB24		
SCR - B3F- cell DB25		
SCR - B3F- cell DB26		
SCR - B3F- cell DC1-DC9		
SCR - B3F- cell DC10		
SCR - B3F- cell DD1-DD9		
SCR - B3F- cell DD10		
SCR - B3F- cell DE1-DE9		
SCR - B3F- cell DF1-DF9		
SCR - B3F- cell DF10		
SCR - B3F- cell DF25		
SCR - B3F- cell DF26		
SCR - B3F- cell DF27		
SCR - B3F- cell DF28		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
SCR - B3F- cell DG1-DG9		
SCR - B3F- cell DG10		
SCR - B3F- cell DG25		
SCR - B3F- cell DG26		
SCR - B3F- cell DH1-DH9		
SCR - B3F- cell DH10		
SCR - B3F- cell DH25		
SCR - B3F- cell DH26		
SCR - B3F- cell DI1-DI9		
SCR - B3F- cell DI10		
SCR - B3F- cell DI25		
SCR - B3F- cell DI26		
SCR - B3F- cell DI27		
SCR - B3F- cell DI28		
SCR - B3F- cell EA1		
SCR - B3F- cell EB1		
SCR - B3F- cell EC1		
SCR - B3F- cell ED1		
SCR - B3F- cell EE1		
SCR - B3F- cell EE2		
SCR - B3F- cell EE3		
SCR - B3F- cell EF1		
SCR - B3F- cell EG1		
SCR - B3F- cell EH1		
SCR - B3F- cell EH2		
SCR - B3F- cell EH3		
SCR - B3F- cell FA1		
SCR - B3F- cell FB1		
SCR - B3F- cell FC1		
SCR - B3F- cell FD1		
SCR - B3F- cell FE1		
SCR - B3F- cell GA1		
SCR - B3F- cell GA2		
SCR - B3F- cell GA3		
SCR - B3F- cell GA4		
SCR - B3F- cell GA5		
SCR - B3F- cell GA6		
SCR - B3F- cell HA1		
SCR - B3F- cell HB1		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
SCR - B3F- cell HC1		
SCR - B3F- cell HD1		
SCR - B3F- cell HE1		
SCR - B3F- cell HF1		
SCR - B3F- cell HG1		
SCR - B3F- cell HH1		
SCR - B3F- cell HA2-HE2		
SCR - B3F- cell HF2		
SCR - B3F- cell HG2		
SCR - B3F- cell HH2		
SCR - B3F- cell HI2		
SCR - B3F- cell HJ2		
SCR - B3F- cell HA3		
SCR - B3F- cell HB3		
SCR - B3F- cell HC3		
SCR - B3F- cell HA4		
SCR - B3F- cell HB4		
SCR - B3F- cell HC4		
SCR - B3F- cell HA5		
SCR - B3F- cell HB5		
SCR - B3F- cell HC5		
SCR - B3F- cell IA1-IB1		
SCR - B3F- cell IC1		
SCR - B3F- cell ID1		
SCR - B3F- cell IE1		
SCR - B3F- cell IF1		
SCR - B3F- cell JA1		
SCR - B3F- cell JA2		
SCR - B3F- cell JA3		
SCR - B3F- cell JA4		
SCR - B3F- cell KA1-KE1		
SCR - B3F- cell KA2-KE2		
SCR - B3F- cell KA3-KE3		
SCR - B3F- cell KA4-KE4		
SCR - B3F- cell KA5-KE5		
SCR - B3F- cell KA6-KE6		
SCR - B3F- cell KA7-KE7		
SCR - B3F- cell KF1		
SCR - B3F- cell KF4		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
SCR - B3F- cell KF5		
SCR - B3F- cell KF6		
SCR - B3F- cell KF7		
SCR - B3F- cell KA8		
SCR - B3F- cell KB8		
SCR - B3F- cell KC8		
SCR - B3F- cell KA9		
SCR - B3F- cell KB9		
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		
SCR - B3F- cell LA6-LB6		
SCR - B3F- cell LC6		
SCR - B3F- cell LA7		
SCR - B3F- cell LA8		
SCR - B3F- cell LA9		
SCR - B3F- cell LA10		
SCR - B3F- cell LA11		
SCR - B3F- cell LA12		
SCR - B3F- cell LB12		
SCR - B3F- cell LC12		
SCR - B3F- cell LA13		
SCR - B3F- cell LB13		
SCR - B3F- cell LC13		
SCR - B3F- cell LA14		
SCR - B3F- cell LB14		
SCR - B3F- cell LC14		
SCR - B3F- cell MA1-ME1		

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	MetLife	
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		
SCR - B3F- cell NK34		
SCR - B3F- cell NL1		
SCR - B3F- cell NL32		
SCR - B3F- cell NM1		
SCR - B3F- cell NM32		
SCR - B3F- cell NN1		
SCR - B3F- cell NN32		
SCR - B3F- cell NN33		
SCR - B3F- cell NN34		
SCR - B3F- cell OA1		
SCR - B3F- cell OB1,OC1,OD1,OE1,OF1		
SCR - B3F- cell OG1		
SCR - B3F- cell OG21		
SCR - B3F- cell OG22		
SCR - B3F- cell OG23		
SCR - B3F- cell OH1		
SCR - B3F- cell OH21		
SCR - B3F- cell OI1		
SCR - B3F- cell OI21		
SCR - B3F- cell OJ1		
SCR - B3F- cell OJ21		

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	MetLife	
SCR - B3F- cell OJ22		
SCR - B3F- cell OJ23		
SCR - B3F- cell PA21		
SCR - B3F- cell PB21		
SCR - B3F- cell PC1		
SCR - B3F- cell PD1,PF1,PH1		
SCR - B3F- cell PE1, PG1, PI1		
SCR - B3F- cell PJ1		
SCR - B3F- cell PJ21		
SCR - B3F- cell PK21		
SCR - B3F- cell PL21		
SCR - B3F- cell PM21		
<b>SCR - B3G - General Comments</b>		
SCR - B3G- cell A30		
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		
SCR - B3G- cell A14		
SCR - B3G- cell A15		
SCR - B3G- cell A16		
<b>MCR - B4A - General Comments</b>		
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		



<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	MetLife	
MCR - B4A- cell C5		
MCR - B4A- cell B6		
MCR - B4A- cell C6		
MCR - B4A- cell B7		
MCR - B4A- cell C7		
MCR - B4A- cell B8		
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		
MCR - B4A- cell A25		
MCR - B4A- cell A26		
MCR - B4A- cell A27		
MCR - B4A- cell A28		
MCR - B4A- cell A29		
MCR - B4A- cell A30		
<b>MCR - B4B - General Comments</b>		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
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		
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		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
MCR - B4B- cell E11		
MCR - B4B- cell F11		
MCR - B4B- cell G11		
MCR - B4B- cell D12		
MCR - B4B- cell E12		
MCR - B4B- cell F12		
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		
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		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
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		
<b>G01-General Comments</b>	We understand this template requires selected disclosures under SII and others using local GAAP - we question the relevance and usefulness of reporting and aggregating information for different undertakings under different bases	
G01- cell A1		
G01- cell B1		
G01- cell C1		
G01- cell D1		
G01- cell E1		
G01- cell F1		
G01- cell G1		
G01- cell H1a		
G01- cell H1b		
G01- cell H1c		
G01- cell I1a		
G01- cell I1b		
G01- cell J1		
G01- cell K1		
G01- cell L1		
G01- cell M1		
G01- cell N1		
G01- cell O1		
G01- cell P1		
G01- cell Q1		
G01- cell R1		
G01- cell S1		
G01- cell T1		
G01- cell U1		
<b>G03 – General Comments</b>		
G03- cell A1		
G03- cell A2		
G03- cell B1		
G03- cell B2		

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	MetLife	
G03- cell B3		
G03- cell B4		
G03- cell B5		
G03- cell B6		
G03- cell B7		
G03- cell C1		
G03- cell D1		
G03- cell F1		
G03- cell G1		
G03- cell H1		
G03- cell N1		
G03- cell O1		
G03- cell P1		
<b>G04 – General Comments</b>		
G04- cell A1		
G04- cell A2		
G04- cell A3		
G04- cell B1		
G04- cell C1		
G04- cell D1		
G04- cell E1		
<b>G14- General Comments</b>		
G14- cell A1		
G14- cell B1		
G14- cell S1		
G14- cell C1,F1,I1,L1,O1		
G14- cell D1,G1,J1,M1,P1		
G14- cell E1,H1,K1,N1,Q1		
G14- cell R1		
<b>Technical Annex IV General Comments</b>		
<b>Technical Annex V General Comments</b>		
<b>Technical Annex VI General Comments</b>		
<b>Technical Annex VII General Comments</b>		
CAS1		
CAS2		
CAS3		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
CAS4		
CAS5		
CAS6		
CAS7		
CAS8		
CAS9		
CAS10		
CAS11		
CAS12		
CAS13		
CAS14		
CAS15		
CAS16		
CAS17		
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CAS31		
CAS32		
CAS33		
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CAS37		
CAS38		
CAS39		
CAS40		
CAS41		
CAS42		

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	MetLife	
CAS43		
CAS44		
CAS45		
CAS46		
CAS47		
CAS48		
CAS49		
CAS50		
CAS51		
CAS52		
CAS53		
CAS54		
CAS55		
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CAS71		
CAS72		
CAS73		
CAS74		
CAS75		
CAS76		
CAS77		
CAS78		
CQS1		
CQS2		
CQS3		

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Name of Company:	MetLife	
CQS4		
CQS5		
CQS6		
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CQS8		
CQS9		
CQS10		
CQS11		
CQS12		
CQS13		
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CQS41		
CQS42		



<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	MetLife	
CQS43		
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CQS45		
CQS46		
CQS47		
CQS48		
CQS49		
CQS50		
CQS51		
CQS52		
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CQS63		
CGS1		
CGS2		
CGS3		
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CGS5		
CGS6		
CGS7		
CGS8		
CGS9		
CGS10		
CGS11		
CGS12		
CGS13		
CGS14		
CGS15		
CGS16		
CGS17		
CGS18		

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	MetLife	
CGS19		
CGS20		
CGS21		
QCGS1		
Instructions		
<b>Impact Assessment – General Coments</b>		
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2,16		
Question 1		
Question 1 – Option 1		
Question 1 – Option 2		
Question 2		
Question 2 – Option 1		
Question 2 – Option 2		
Question 2 – Option 3		
Question 2 – Option 4		
Question 3		
Question 3 – Option 1		
Question 3 – Option 2		
Question 3 – Option 3		
Question 4		
Question 4 – Option 1		
Question 4 – Option 2		
Question 4 – Option 3		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
Question 4 – Option 4		
Question 4 – Option 5		
Question 5		
Question 5 – Option 1		
Question 5 – Option 2		
Question 6		
Question 6 – Option 1		
Question 6 – Option 2		
Question 6 – Option 3		
Question 6 – Option 4		
Question 7		
Question 7 – Option 1		
Question 7 – Option 2		
Question 7 – Option 3		
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2,23	As firm supporters of the European Single Market, we strongly advocate harmonisation across the EU. As expressed in the Solvency II text, harmonisation is about mutual recognition of authorisations and supervisory systems, allowing an entity to operate across the EU with a single authorisation. We support this principle as it makes compliance more effective and cost-efficient and provides clarity and consistency of expectations for Solvency II. We therefore agree with EIOPA that it is vital for joint and consistent preparatory actions to be taken at a European level to maximize the benefits of a harmonized approach.	
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<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	MetLife	
2,27	<p>We welcome the decision to stagger the reporting requirements, rather than mandating a “big bang” approach to implementation of qualitative and quantitative disclosures. However, we have concerns on the level of disclosures (more particularly, qualitative disclosures) many of which are significantly onerous. For example, description of the level of uncertainty in determination of technical provisions, explanation of material difference between Solvency I and Solvency II measurement basis for technical provisions at a line of business level.</p> <p>We believe the objective of any disclosure requirement should be to strike the appropriate balance between cost and potential benefits.</p>	
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2,29	<p>We fully agree that testing will inevitably be required when implementing a new system. However this testing could be performed off cycle or incorporate greater flexibility around deadlines, so as not to unnecessarily impact the existing reporting process. See Comment 1.9</p>	
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2,40	<p>The IGT and RC templates are onerous. Whilst we welcome the proposal to introduce thresholds, there needs to be explicit and consistent guidance on these thresholds. We believe these templates should only comprise of material IGTs. There should be flexibility to allow for the aggregation of transactions that are similar in nature.</p>	
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2,44	<p>We appreciate the exemption from presenting the Statutory Accounts balances on BS-C1 for those undertakings not generating Group Financial Statements (availing of the exemption under EU Directive) . We believe this exemption should also apply to the Profit or Loss required under Financial Stability reporting - as this would also be burdensome and costly to produce, particularly where different GAAPs are in use.</p>	
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Name of Company:	MetLife	
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2,64	<p>EIOPA suggest that the Guidelines should be applied in a manner that is both proportionate and practical and allows for some flexibility. We would endorse this, noting that the Guidelines are meant to help prepare for Solvency II and not for its full implementation.</p> <p>MetLife is restructuring its European operations in such a way that most of our subsidiaries will become branches of MetLife Europe Limited and MetLife Europe Insurance Limited. This restructuring is expected to be complete prior to the effective date of Solvency II. Given that regulatory requirements differ for subsidiaries and branches, we would ask that that NCAs are mindful of EIOPA's flexible approach to the Guidelines and consider the structure of our operations upon full implementation of Solvency II.</p>	
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<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	MetLife	
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Appendix 1		
Appendix 2		
Appendix 3		