

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities	Deadline 19. Jun 13 12:00 CET
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Name of Company:	Steptoe & Johnson LLP	
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
- Please do not insert or delete any row. If you have no comment on a paragraph or a cell, keep the row empty.
- Leave the last column empty.
- Please fill in your comment in the relevant row.
- Our IT tool does not allow processing of comments which do not refer to the specific numbers below.
 - 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.

Please send the completed template, in Word Format, to CP-13-010@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 Technical Annexes II and III.

Reference	Comment	Resolution
General Comments		
Introduction General Comments		
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1,36	<p>According to the Guideline, the obligation to report on behalf of the insurance group would belong to the participating (re)insurance undertaking or to the insurance holding company at the head of a group. We consider that other companies within the group may be better placed to fulfil these reporting duties. An express reference in the Guideline would positively reflect the existing variety of corporate structures of insurance groups across the EU.</p> <p>(Re)insurance groups differ from each other in their structure and organisation. In particular, we note that insurance holding companies may fulfil different roles within the groups: active insurance holding companies may centralise the management and supervision of the group companies, establish the risk appetite for the group and control capital allocation for efficiency purposes. Conversely, holding companies may carry out a financial or non-financial, industrial activity, or their corporate object and sole activity may be limited to holding shares in subsidiaries (we refer to this last category as “inactive holding companies”). Inactive holding companies do not carry out a regulated activity and do not actively participate or control the subsidiaries’ business activities.</p> <p>Given the limited involvement of the inactive holding company in its subsidiaries’ activities, its reporting function on behalf of the group would be limited to an aggregation of those of the subsidiaries, which the regulator has access to in any case. Aggregate reports of this nature may therefore not be appropriate where the holding company is inactive i.e. it does not centrally determine and monitor neither risk appetite nor the management of capital against that appetite.</p> <p>Due to the above reasons, the inactive holding company may not be the best vehicle to report on the subsidiaries’ activities or to ensure compliance. Therefore, we suggest that the Guideline should expressly allow the national supervisor to determine, together with the parent undertaking, the entity within the group which is best placed to perform the duty to report. The national supervisors should be able to consider the entity responsible for fulfilling the governance requirements at group level as the main entry or contact point for reporting purposes.</p>	
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Section III. General Comments		
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1,55	<p>The Guideline imposes on groups certain reporting obligations. However, it is silent as to which entity within the (re)insurance group has the obligation to report the group's information. We consider that an express clarification of this point in the Guideline would positively contribute to a consistent application of such Guideline by the national supervisors.</p> <p>(Re)insurance groups differ from each other in their structure and organisation. In particular, we note that insurance holding companies may fulfil different roles within the groups Insurance holding companies may fulfil different roles: active insurance holding companies may centralise the management and supervision of the group companies, establish the risk appetite for the group and control capital allocation for efficiency purposes. Conversely, holding companies may carry out a financial or non-financial, industrial activity, or their corporate object and sole activity may be limited to holding shares in subsidiaries (we refer to this last category as "inactive holding companies"). Inactive holding companies do not carry out a regulated activity and do not actively participate or control the subsidiaries' business activities.</p> <p>Given the limited involvement of the inactive holding company in its subsidiaries' activities, its reporting function on behalf of the group would be limited to an aggregation of those of the subsidiaries, which the regulator has access to in any case. Aggregate reports of this nature may therefore not be appropriate where the holding company is inactive i.e. it does not centrally determine and monitor neither risk appetite nor the management of capital against that appetite.</p> <p>Due to the above reasons, the inactive holding company may not be the best vehicle to report on the subsidiaries' activities or to ensure compliance. Therefore, we suggest that the Guideline should expressly allow the national supervisor to determine, together with the parent undertaking, the entity within the group which is best placed to perform the duty to report. The national supervisors should be able to consider the entity responsible for fulfilling the governance requirements at group level as the main entry or contact point for reporting purposes.</p>	
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Name of Company:	Step toe & Johnson LLP	
BS-C1- cell A8E		
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BS-C1- cell A8D		
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BS-C1- cell A10A		
BS-C1- cell A10B		
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BS-C1- cell L6		
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BS-C1- cell L8		
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Name of Company:	Step toe & Johnson LLP	
BS-C1D- cell A6		
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BS-C1D- cell A8		
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Name of Company:	Step toe & Johnson LLP	
AS-D20- cell A1		
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TP-F1- cell J1,J2,J4,J6,J7,J9,J10,J12,J13,J14		

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Name of Company:	Step toe & Johnson LLP	
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		
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Name of Company:	Stephoe & Johnson LLP	
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Name of Company:	Step toe & Johnson LLP	
OF-B1Q- cell C606		
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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		
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		

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:	Step toe & Johnson LLP	
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		
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		

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:	Step toe & Johnson LLP	
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		
SCR - B2B – General Comment		
SCR - B2B- cell A1		
SCR - B2B- cell A1A		
SCR - B2B- cell A1B		
SCR - B2B- cell A1C		
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		

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:	Step toe & Johnson LLP	
SCR - B2B- cell B8AA		
SCR - B2B- cell B8A		
SCR - B2B- cell A11A		
SCR - B2B- cell A11B		
SCR - B2C – General Comment		
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		
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		
SCR - B3A – General Comment		
SCR - B3A – cell A00		
SCR - B3A – cell AA01		
SCR - B3A – cell AA02		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities	Deadline 19. Jun 13 12:00 CET
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Name of Company:	Step toe & Johnson LLP
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	
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	

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities	Deadline 19. Jun 13 12:00 CET
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Name of Company:	Step toe & Johnson LLP
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	
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	

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:	Step toe & Johnson LLP	
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		
SCR - B3B – General Comment		
SCR - B3B – cell A00		
SCR - B3B – cell A001		
SCR - B3B – cell A30		
SCR - B3B – cell A10		
SCR - B3B- cell A1		
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		
SCR - B3C – General Comment		
SCR - B3C – cell A01		
SCR - B3C – cell A02		
SCR - B3C – cell A03		
SCR - B3C – cell A04		
SCR - B3C – cell A05		

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:	Step toe & Johnson LLP	
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		
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		

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:	Step toe & Johnson LLP	
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		
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		
SCR - B3D – General Comment		
SCR - B3D – cell A01		
SCR - B3D – cell A02		
SCR - B3D – cell A03		
SCR - B3D – cell A04		
SCR - B3D – cell A05		

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:	Step toe & Johnson LLP	
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		
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		

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:	Step toe & Johnson LLP	
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		
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		

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:	Step toe & Johnson LLP	
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		
SCR - B3D- cell A27		
SCR - B3E – General Comment		
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		

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:	Step toe & Johnson LLP	
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		
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		

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:	Step toe & Johnson LLP	
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		
SCR - B3F - General Comment		
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		
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		

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:	Step toe & Johnson LLP	
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		
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		

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Name of Company:	Step toe & Johnson LLP	
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		
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		

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:	Step toe & Johnson LLP	
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		
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		

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Name of Company:	Step toe & Johnson LLP	
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		
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		

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Name of Company:	Step toe & Johnson LLP	
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		
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		

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Name of Company:	Step toe & Johnson LLP	
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		
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		

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Name of Company:	Step toe & Johnson LLP	
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		
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		

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Name of Company:	Step toe & Johnson LLP	
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		
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		
SCR - B3G - General Comments		
SCR - B3G- cell A30		

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Name of Company:	Stephoe & Johnson LLP	
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		
MCR - B4A - General Comments		
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		
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		

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Name of Company:	Step toe & Johnson LLP	
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		
MCR - B4B - General Comments		
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		

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Name of Company:	Step toe & Johnson LLP	
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		
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		
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MCR - B4B- cell F14		

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Name of Company:	Step toe & Johnson LLP	
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		
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		
G01-General Comments		
G01- cell A1		
G01- cell B1		
G01- cell C1		
G01- cell D1		
G01- cell E1		
G01- cell F1		

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Name of Company:	Step toe & Johnson LLP	
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		
G03 – General Comments		
G03- cell A1		
G03- cell A2		
G03- cell B1		
G03- cell B2		
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		
G04 – General Comments		
G04- cell A1		
G04- cell A2		

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Name of Company:	Step toe & Johnson LLP	
G04- cell A3		
G04- cell B1		
G04- cell C1		
G04- cell D1		
G04- cell E1		
G14- General Comments		
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		
Technical Annex IV General Comments		
Technical Annex V General Comments		
Technical Annex VI General Comments		
Technical Annex VII General Comments		
CAS1		
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Name of Company:	Step toe & Johnson LLP	
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Name of Company:	Step toe & Johnson LLP	
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CAS64		
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CAS69		
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Name of Company:	Step toe & Johnson LLP	
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Name of Company:	Step toe & Johnson LLP	
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CQS62		
CQS63		
CGS1		
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CGS15		
CGS16		
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CGS18		
CGS19		
CGS20		
CGS21		
QCGS1		
Instructions		
Impact Assessment – General Coments		
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Name of Company:	Stephoe & Johnson LLP	
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Appendix 1		
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