

	<p align="center">Comments Template on EIOPA-CP 11/010a and EIOPA-CP 11/010b Consultation Paper on the Proposal for Guidelines on Complaints-Handling by Insurance Undertakings and Draft Report on Best Practices by Insurance Undertakings in handling complaints</p>	<p align="center">Deadline 31 January 2012 12:00 CET</p>
<p>Company name:</p>	<p>AILO</p>	
<p>Disclosure of comments:</p>	<p>EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential.</p> <p><i>Please indicate if your comments on this CP should be treated as confidential, by deleting the word Public in the column to the right and by inserting the word Confidential.</i></p>	<p>Public</p>
	<p>Please follow the instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ Do not change the numbering in column "Reference", or any other formatting in the file. ⇒ Please fill in your comment in the relevant row. If you have no comment on a paragraph, keep the row empty. Please do not delete rows in the table. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific paragraph numbers below. <ul style="list-style-type: none"> ○ If your comment refers to multiple paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other paragraphs this also applies. ○ If your comment refers to sub-bullets/sub-paragraphs, please indicate this in the comment relating to the corresponding paragraph. <p>Please send the completed template to CP-010@eiopa.europa.eu, in MS Word Format, (our IT tool does not allow processing of any other formats).</p> <p>The paragraph numbers and questions below correspond to document no. EIOPA-CP-11/010a. There is an additional section at the end of the table for general comments on the draft Best Practices Report (document no. EIOPA-CP-11/010b).</p>	

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Reference	Comment	
General Comment	<p>The Association of International Life Offices (“AIO”) is grateful for the opportunity to comment on the consultation paper on the proposal for guidelines on complaint handling by insurance undertakings.</p> <p>AIO represents the interests of a number of EU/EEA and other life insurance companies, many of which are members of internationally recognised groups. AIO members market life insurance contracts in the EU/EEA and in other regions of the world. The customer base encompasses residents in EU/EEA States, international and European expatriates and also the international business community. Member companies are responsible for approximately €80 billion of assets under management in total.</p> <p>Operating either on the basis of the EU’s freedom of services or branch passport, AIO member companies make full use of possibilities offered by the EU Insurance Directives. In 2009, AIO member companies received an estimated €10 billion of premiums within the EEA. AIO members have over five million policyholders comprising EU nationals either in their home country or working in another Member State. Each year, they write substantial new premium income in Europe, providing policyholders with choice, security, transparency and value.</p> <p>As an association representing insurance companies operating on a cross-border basis within the EU/EEA, AIO is uniquely positioned to provide policymakers with insight into the practical issues facing EU/EEA cross-border life insurance business. This may assist EIOPA in achieving Solvency II’s goal of deepening the Single Market in insurance and promoting a truly integrated Market.</p> <p>For further details please see our website: www.aio.org.</p> <p>General comments on the guidelines.</p> <p>AIO Members fully support the proposals which largely reflect the processes already in place within Member company organisations.</p> <p>Historically some of our Members have encountered situations where complainants have instigated legal proceedings without having explored or exhausted the in house and ombudsman schemes available. This</p>	

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	<p>has of course resulted in their incurring what may be unnecessary legal expenses. All our Members of course refer to complaints procedures in their documentation. However as an added service, AILO has produced a short guide to making a complaint which has been produced in seven languages and is available from our website.</p>	
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3.17.	Comments are not being sought on this paragraph at this stage	
3.18.	Comments are not being sought on this paragraph at this stage	
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Q1. – on Impact Assessment		

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Q2.– on Impact Assessment		
Q3.– on Impact Assessment		
Q4.– on Impact Assessment		
Best Practices Report Comments (EIOPA-CP-11/010b)	AILO Members have no additional comments to offer on the report, which generally reflects Members' complaints management policies and functions	