

**Comments Template on
Draft proposal for Quantitative Reporting Templates**

**Deadline
20 January 2012
12:00 CET**

Name of Company:	The Phoenix Group	
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Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public
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Please follow the following instructions for filling in the template:

- ⇒ Do not change the numbering in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool
- ⇒ Leave the last column empty.
- ⇒ Please fill in your comment in the relevant row. If you have no comment on a paragraph or a cell, keep the row empty.
- ⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below.
 - Certain rows represent a group of cells with similar information (ex : TP - E3- cells A17-A31-J16 for a given triangle in TP-E3)
 - Cells that refer to formulas are not mentioned in specific rows; in case you have comments on formulas, please make them in the cell "general" for the given template
 - In spreadsheets & LOGs, certain cell number may seem like they are missing (ex : going directly from cell B1 to cell B3); this is normal, as they may refer to a previously existing cell that has been deleted during informal consultations, and cell numberings have not been changed for internal consistency purposes
 - 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.

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- 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 cp009@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 accompanying spreadsheets and LOGs, the reference to "General", "Purpose", etc. refers to summary documents.

Reference	Comment
General Comment	<p>For unit-linked and the equivalent type of contracts, where the policyholder bears the risk, is it necessary to report all the details in the underlying investment funds?</p> <p>Whilst there is a general improvement in the definitions provide in the Log files, many definitions still remain unclear and would benefit from detailed explanations.</p> <p>The level of rounding / reporting has not been defined for any templates. Will this be in hundred thousands, millions?</p> <p>A disctionary of all definitions used across the QRTs would be helpful.</p> <p>There is a lack of consistency in the use of field names across the QRTs. These have been highlighted where appropriate, however a consistency review by EIOPA would be helpful.</p>

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	<p>Where a detailed split of data items is not possible, it should be acceptable to report summary items only (possibly within materiality limits).</p> <p>Fourth quarter reporting should not be necessary given the tight timescales where Undertakings will be working on Annual SII and IFRS end of year accounts. They will add little more than the Annual QRTs will provide.</p> <p>The proposal is for Q4 and annual (year end) balance sheet templates submissions 5 weeks/14 weeks respectively after the end date (in post SII world). There is a potential risk that some numbers will not be finalised (or prove extremely challenging) 5 weeks after year end date and therefore will not be consistent with the annual submission numbers for certain data items. We question the merit of having to submit Q4 data in the timescales.</p> <p>It would be very helpful to have a file containing all QRT requirements in table / database format to aid requirement management for Undertakings. It may be necessary to do this anyway for XBRL tagging purposes.</p>	
3.1		
3.2		
3.3		
3.4		
3.5		
3.6		
4.1		
4.2		

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4.3		
4.4		
4.5		
4.6		
4.7	Contingent liabilities should not appear on the Balance Sheet. Many contingent liabilities are treated as off Balance Sheet items for accounting purposes.	
4.8		
4.9		
4.10		
4.11		
Technical Annex (only for inconsistencies)		
BS-C1 – General	There is an inconsistent use of total fields in the Balance Sheet QRT. Some are above the detailed items and some below. Can this be rationalised. Is it necessary to report the split of Best Estimate and Risk Margin on the Balance Sheet? No tie in to IFRS and the detailed split is available on TP-F1. Is it necessary to report the split of Investment Funds on the Balance sheet QRT? No tie in to IFRS and detail is reported within the Assets QRT D4.	
BS-C1 – Purpose	Please clarify whether the reconciliation with statutory accounting valuations (i.e. IFRS) is intended to only valuation differences, or is the intention to include reclassification differences?	
BS-C1 – Benefits		
BS-C1 – Costs		

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BS-C1 – Groups	Where the Group level for Solvency II is different to that used for consolidated accounts, a direct comparison at Group level will not be possible. Should the statutory accounts column not be publicly disclosed?	
BS-C1 – Materiality		
BS-C1 - Disclosure		
BS-C1 – Frequency		
BS-C1 – cell AS1		
BS-C1- cell AS24		
BS-C1- cell A2		
BS-C1- cell AS2		
BS-C1- cell A26		
BS-C1- cell AS26		
BS-C1- cell A25B		
BS-C1- cell AS25B		
BS-C1- cell A3		
BS-C1- cell AS3		
BS-C1- cell A5		
BS-C1- cell AS5		
BS-C1- cell A6		
BS-C1- cell AS6		
BS-C1- cell A7		
BS-C1- cell AS7		
BS-C1- cell A7A		
BS-C1- cell AS7A		
BS-C1- cell A8	Please clarify the definition of government bonds.	

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	Does this include ' <i>bonds demonstrably guaranteed by national government</i> '	
BS-C1- cell AS8		
BS-C1- cell A8A		
BS-C1- cell AS8A		
BS-C1- cell A8C		
BS-C1- cell AS8C		
BS-C1- cell A8D		
BS-C1- cell AS8D		
BS-C1- cell AS9		
	Cells A9A – A9F: Investment Managers have indicated that there may be issues with providing access to look-through data on Investment Funds, as this is market-sensitive data. Data reported may be out of date because of this. We therefore recommend that look-through data is not reported. These values are disclosed on the Assets template – D4. Why are they also required to be disclosed on the Balance sheet?	
BS-C1- cell A9A		
BS-C1- cell A9B	As A9A	
BS-C1- cell A9C	As A9A	
BS-C1- cell A9D	As A9A	
BS-C1- cell A9E	As A9A	
BS-C1- cell A9F	As A9A	
BS-C1- cell A10A		
BS-C1- cell AS10A		
BS-C1- cell A10B		
BS-C1- cell AS10B		
BS-C1- cell A14		

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BS-C1- cell AS14	AS14 on Liability side of Balance Sheet should be LS14	
BS-C1- cell A11		
BS-C1- cell AS11		
BS-C1- cell A12	Please provide further clarification of the definition of 'Assets held for index-linked and unit-linked funds'? Is the intention to include certain Insurance products (e.g. Index-linked annuities) where not all Investment risk is borne by the policyholder?	
BS-C1- cell AS12		
BS-C1- cell A14A		
BS-C1- cell AS14A		
BS-C1- cell A17		
BS-C1- cell AS17		
BS-C1- cell A18		
BS-C1- cell AS18		
BS-C1- cell A18A		
BS-C1- cell AS18A		
BS-C1- cell A19		
BS-C1- cell AS19		
BS-C1- cell A19A		
BS-C1- cell AS19A		
BS-C1- cell A13		
BS-C1- cell AS13		
BS-C1- cell A21		
BS-C1- cell AS21		
BS-C1- cell A20	Should 'Reinsurance receivables' be included in the Total cell – A16? Not consistent with QRT J3 – Total reinsurance recoverables.	

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BS-C1- cell AS20		
BS-C1- cell A23		
BS-C1- cell AS23		
BS-C1- cell A27		
BS-C1- cell AS27		
BS-C1- cell A29		
BS-C1- cell AS29		
BS-C1- cell LS1		
BS-C1- cell L1A		
BS-C1- cell L2		
BS-C1- cell L3		
BS-C1- cell LS4		
BS-C1- cell L4A		
BS-C1- cell L5		
BS-C1- cell L6		
BS-C1- cell LS6B		
BS-C1- cell L6C		
BS-C1- cell L6D		
BS-C1- cell L6E		
BS-C1- cell LS7		
BS-C1- cell L7A		
BS-C1- cell L8		
BS-C1- cell L9		
BS-C1- cell LS10		
BS-C1- cell L10A		

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BS-C1- cell L11		
BS-C1- cell L12		
BS-C1- cell L23	Many contingent liabilities are treated for accounting purposes as off-balance sheet because it is not clear that they actually are liabilities at a balance sheet date. These should only be valued as liabilities in the context of the sale of a business as a whole. Treatment under Solvency II should be consistent with IFRS.	
BS-C1- cell L18		
BS-C1- cell LS18		
BS-C1- cell L22		
BS-C1- cell LS22		
BS-C1- cell L13		
BS-C1- cell LS13		
BS-C1- cell L17		
BS-C1- cell LS17		
BS-C1- cell L16		
BS-C1- cell LS16		
BS-C1- cell L19	Is it necessary to split amounts due from credit institutions separately from non-credit institutions, or banks deposits due in less than one year separately from those that are greater than one year. We suggest that the basis should be the same as IFRS, cannot see any benefit in splitting out.	
BS-C1- cell LS19		
BS-C1- cell L20		
BS-C1- cell LS20		
BS-C1- cell L15A		
BS-C1- cell LS15A		
BS-C1- cell L15B		

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BS-C1- cell LS15B		
BS-C1- cell L15C		
BS-C1- cell LS15C		
BS-C1- cell L15D		
BS-C1- cell LS15D		
BS-C1- cell L25		
BS-C1- cell LS25		
BS-C1- cell L26	As a general comment on the format of the presentation of Own Funds on the Balance Sheet, we feel that the previous version of the QRT was clearer.	
BS-C1B – General	<p>Collateral held / pledged – Under IFRS, collateral is not necessarily off Balance Sheet. The accounting treatment depends on rights of the entity over assets accepted / pledged.</p> <ul style="list-style-type: none"> • Is the treatment of collateral received / pledged under Solvency II consistent with IFRS? • If yes, does BS-C1B only require off-Balance sheet collateral, or all collateral? 	
BS-C1B – Purpose		
BS-C1B – Benefits		
BS-C1B – Costs		
BS-C1B – Groups		
BS-C1B – Materiality		
BS-C1B - Disclosure		
BS-C1B – Frequency		
BS-C1B- cell A2		
BS-C1B- cell A3A		

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BS-C1B- cell A3C		
BS-C1B- cell B3C		
BS-C1B- cell C3C		
BS-C1B- cell D3C		
BS-C1B- cell A3B		
BS-C1B- cell B3B		
BS-C1B- cell A10		
BS-C1B- cell B10		
BS-C1B- cell A12A		
BS-C1B- cell B12A		
BS-C1B- cell A13		
BS-C1B- cell B13		
BS-C1B- cell A13A		
BS-C1B- cell B13A		
BS-C1B- cell A14		
BS-C1B- cell B14		
BS-C1B- cell A15A		
BS-C1B- cell B15A		
BS-C1B- cell A17		
BS-C1B- cell B17		
BS-C1B- cell A17A		
BS-C1B- cell B17A		
BS-C1B- cell A18	For contingent liabilities, a 'probability' field should be included, or else contingent liabilities should not be disclosed here. The current format could be confusing to the casual reader.	
BS-C1B- cell A5		

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BS-C1B- cell A9A		
BS-C1B- cell A9B		
BS-C1B- cell B9B		
BS-C1B- cell C9B		
BS-C1B- cell A19	Why are we reporting on-Balance Sheet items on the Off-Balance Sheet QRT? Again this appears confusing to the casual reader.	
BS-C1B- cell B19	Why are we reporting on-Balance Sheet items on the Off-Balance Sheet QRT? Again this appears confusing to the casual reader.	
BS-C1D – General	How would hedging (with derivatives as hedging instruments) be reflected in the reporting template? Should the net position be reported? Or should the derivatives be reported separately?	
BS-C1D – Purpose		
BS-C1D – Benefits		
BS-C1D – Costs		
BS-C1D – Groups		
BS-C1D – Materiality		
BS-C1D - Disclosure		
BS-C1D – Frequency		
BS-C1D- cell A1		
BS-C1D- cell B1		
BS-C1D- cell C1		
BS-C1D- cell D1		
BS-C1D- cell E1		
BS-C1D- cell A3	Where derivatives are held and these are for example, cross currency basis swaps, how should these be reported? Also, would it not be preferable to	

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	report them based on their economic effect so as to show the hedging impact of the transaction?	
BS-C1D- cell A4		
BS-C1D- cell A5	Is It necessary to report Unit-linked policies here? Any currency mismatch risk is borne by the policyholder.	
BS-C1D- cell A5A		
BS-C1D- cell A6		
BS-C1D- cell A7		
BS-C1D- cell A8	This template appears to require that the risk margin be split by currency. Can risk margin be reported in a single (entity supporting) currency?	
BS-C1D- cell A9		
BS-C1D- cell A10		
BS-C1D- cell A11	Is this value based on the hedging currency or the issue currency?	
BS-C1D- cell A12		
BS-C1D- cell A13		
BS-C1D- cell A14		
BS-C1D- cell A16		
Country - K1- General	This template requires information by class and not by Line of Business, earlier Consultations indicated that this may move to Line of Business. We would support a move to split by Line of Business. 'Frequency of claims for Motor Vehicle Liability' and Average cost of claims for Motor Vehicle Liability (except carrier's liability) are elements that are not in a proper place in this template. The information type requested is totally different from the premium information and not related. Suggest this should be removed.	
Country - K1- Purpose		
Country - K1- Benefits		

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Country - K1- Costs		
Country - K1- Groups		
Country - K1- Materiality	<p>There is an inconsistency between the log and summary documents here. Log file states: Information provided for business carried out in non-EEA jurisdictions, under a materiality threshold (business carried out in country represents more than 5% or 25 M€ of premiums, or 1 % or 25 M of Technical Provisions, or specific risk profile) Summary document states: Materiality thresholds: for data on non-EEA jurisdictions, it should be reported for jurisdictions where gross written premiums (or claims paid) represent more than 5% or 25 M€ of written premiums (or claims paid)</p> <p>Can further clarification be provided regarding Materiality thresholds for EEA entities?</p>	
Country - K1- Disclosure		
Country - K1- Frequency		
Country - K1- cell A1	Please confirm why premiums written are required to be reported on a cash basis? This is inconsistent with the current accepted accrual basis for the ledger under IFRS.	
Country - K1- cell A2		
Country - K1- cell A3		
Country - K1- cell A4		
Country - K1- cell C1	Please confirm why premiums written are required to be reported on a cash basis? This is inconsistent with the current accepted accrual basis for the ledger under IFRS.	
Country - K1- cell C2		
Country - K1- cell C3		

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Country - K1- cell C4		
Country - K1- cell E1	Please confirm what basis is this value to be reported on? Cashflow or accrual? We would recommend accrual basis in line with current IFRS practice and existing accounting systems.	
Country - K1- cell E2		
Country - K1- cell E3		
Country - K1- cell E4		
Country - K1- cell H1		
Country - K1- cell H2		
Country - K1- cell H3		
Country - K1- cell H1A		
Country - K1- cell H2A		
Country - K1- cell H3A		
Cover - A1A & Q- General	<p>Please clarify the definition of 'localisation of risk', with examples. Is this the risk at the time the policy was sold, or where the insured currently resides. If the latter, this may be difficult to obtain, particularly for 'Gone-aways'. Assumptions would therefore be required, which would appear to devalue the worth of reporting data on this basis.</p> <p>Please clarify the basis for Claims and Expenses data – is this cashflow or Accruals? We suggest that this should be on an Accrual basis as per IFRS. Cashflow basis would make collection of the data difficult as the ledger is not set up in this way and would require substantial re-development to produce information on a cashflow basis, whilst retaining the current accrual basis for statutory reporting.</p> <p>Please clarify the basis for premiums written and premiums earned.</p>	

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	<p>Please clarify whether this QRT follows pre IFRS deposit accounting reporting, i.e. all premiums received, or is it just premiums received on insurance contracts and not investment contracts?</p> <p>A split of Gross / Reinsurer's share and Net will not always be relevant. E.g. Overhead expenses.</p> <p>Allocation of expenses to Lines of business is not currently available and would be entirely arbitrary, whilst not particularly adding any value to the reporting. Suggest this requirement should be removed.</p>	
Cover - A1A & Q- Purpose		
Cover - A1A & Q- Benefits		
Cover - A1A & Q- Costs		
Cover - A1A & Q- Groups	Should Group internal business be eliminated, or should all subsidiaries be summed for Group level reporting?	
Cover - A1A & Q- Materiality		
Cover - A1A & Q- Disclosure		
Cover - A1A & Q- Frequency		
Cover - A1A- cell A1		
Cover - A1A- cell A2		
Cover - A1A- cell A3		
Cover - A1A- cell A4		
Cover - A1A- cell A5		

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Cover - A1A- cell A6		
Cover - A1A- cell A7		
Cover - A1A- cell A8		
Cover - A1A- cell A9		
Cover - A1A- cell A10		
Cover - A1A- cell A11		
Cover - A1A- cell A12		
Cover - A1A- cell A19		
Cover - A1A- cell A20		
Cover - A1A- cell A21		
Cover - A1A- cell A22		
Cover - A1A- cell A23		
Cover - A1A- cell B1		
Cover - A1A- cell B2		
Cover - A1A- cell C1		
Cover - A1A- cell A1A		
Cover - A1A- cell B1A		
Cover - A1A- cell C1A		
Cover - A1A- cell E1		
Cover - A1A- cell F1		
Cover - A1A- cell G1		
Cover - A1A- cell E1A		
Cover - A1A- cell F1A		
Cover - A1A- cell G1A		
Cover - A1A- cell E1B		

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Cover - A1A- cell F1B		
Cover - A1A- cell G1B		
Cover - A1A- cell E1C		
Cover - A1A- cell F1C		
Cover - A1A- cell G1C		
Cover - A1A- cell E1D		
Cover - A1A- cell F1D		
Cover - A1A- cell G1D		
Cover - A1A- cell E1E		
Cover - A1A- cell F1E		
Cover - A1A- cell G1E		
Cover - A1A- cell I1		
Cover - A1A- cell I2		
Cover - A1A- cell I3		
Cover - A1A- cell I3A		
Cover - A1A- cell I3B		
Cover - A1A- cell I4		
Cover - A1A- cell I5		
Cover - A1A- cell I6		
Cover - A1A- cell I7		
Cover - A1A- cell I8		
Cover - A1A- cell I9		
Cover - A1A- cell I10		
Cover - A1A- cell I11	Earners premiums are not currently calculated for Life business. Is reporting on this basis required?	
Cover - A1A- cell J1		

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Cover - A1A- cell I11A		
Cover - A1A- cell J1A		
Cover - A1A- cell L1		
Cover - A1A- cell M1		
Cover - A1A- cell L1A		
Cover - A1A- cell M1A		
Cover - A1A- cell O1		
Cover - A1A- cell P1		
Cover - A1A- cell O1A		
Cover - A1A- cell P1A		
Cover - A1A- cell O1B		
Cover - A1A- cell P1B		
Cover - A1A- cell O1C		
Cover - A1A- cell P1C		
Cover - A1Q- cell A1		
Cover - A1Q- cell A2		
Cover - A1Q- cell A3		
Cover - A1Q- cell A4		
Cover - A1Q- cell A5		
Cover - A1Q- cell A6		
Cover - A1Q- cell A7		
Cover - A1Q- cell A8		
Cover - A1Q- cell A9		
Cover - A1Q- cell A10		
Cover - A1Q- cell A11		

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Cover - A1Q- cell A12		
Cover - A1Q- cell A19		
Cover - A1Q- cell A20		
Cover - A1Q- cell A21		
Cover - A1Q- cell A22		
Cover - A1Q- cell A23		
Cover - A1Q- cell B1		
Cover - A1Q- cell B2		
Cover - A1Q- cell C1		
Cover - A1Q- cell E1		
Cover - A1Q- cell F1		
Cover - A1Q- cell G1		
Cover - A1Q- cell E1Z		
Cover - A1Q- cell F1Z		
Cover - A1Q- cell G1Z		
Cover - A1Q- cell I1		
Cover - A1Q- cell I2		
Cover - A1Q- cell I3		
Cover - A1Q- cell I3A		
Cover - A1Q- cell I3B		
Cover - A1Q- cell I4		
Cover - A1Q- cell I5		
Cover - A1Q- cell I6		
Cover - A1Q- cell I7		
Cover - A1Q- cell I8		

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Cover - A1Q- cell I9		
Cover - A1Q- cell I10		
Cover - A1Q- cell I11		
Cover - A1Q- cell L1		
Cover - A1Q- cell M1		
Cover - A1Q- cell L1Z		
Cover - A1Q- cell M1Z		
OF - B1A & B1Q – General	<ol style="list-style-type: none"> 1. We look forward to receiving the updated guidelines, calculation methodologies and templates as referred to in the template and log. 2. We note the removal of the sub total for basic own funds before adjustments. This sub total allowed for a cleaner reconciliation between Solvency II own funds and IFRS equity. 3. A separate section after the basic own funds sub total for adjustments, as per the previous version of the template, would be preferred. 4. A separate section after the basic own funds sub total for group adjustments would also be preferred. The inclusion of the non available element for each line item within the basic own funds section looks untidy and the use of positive numbers for the adjustments looks misleading. 5. Please provide further guidance on the treatment of Participations (with examples where appropriate) for both Group and Solo Reporting. 6. It is not clear where to apply possible restrictions due to article 323 SCG3 (1) of the draft implementing measures dated 31 October 2011. 7. Cell A1. The log labels the item as Ordinary share capital (net of own shares) whereas the template labels the item as Ordinary share capital (gross of own shares). 8. Cell A1. The log defines A1 as the 'ordinary shares of the undertaking which fully satisfy the criteria for unrestricted tier 1 items'. However A1 	

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- includes C1 which is tier 2.
9. Cell C1. The log defines the cell as net of own shares held whereas the row in the template is labelled as gross of own shares held.
 10. Cell A15A is included twice in the log.
 11. Cell A17. The log relates the cell to tier 1 whereas the cell is the total of all tiers.
 12. Cell A21. Should cell B18 be added and not subtracted?
 13. Cell A21. Should cell A15A be deducted?
 14. Cell B26. Should it also pick up A16 (per Art 58bis COF1bis(1)(d))?
 15. Cell B26. Should this include A18 for the group template?
 16. Cell B29A. Why is B28A deducted in calculation of group reconciliation reserve when its constituent parts are also deducted in the calculation of A21?
 17. Cell A45C. Definition in the log refers only to investment firms and financial institutions whereas the cell is for the total of all other financial sectors.
 18. Cell C46. Definition in the log refers to ancillary own funds however cell is for tier 1 and ancillary own funds cannot be tier 1.
 19. Cell B48. Should cell B18 be added and not subtracted?
 20. Cell A49. Should reference to MCR for a group in the log be changed to minimum SCR for a group for consistency?
 21. Cell D51. Should reference to (D46 or D48) be (D47 or D49) as D46 and D48 include ancillary own funds, which cannot be used to cover MCR?
 22. Cell D51. Should reference to (C46 or C48) be (C47 or C49)? No impact on result as $C47 = C46$ and $C49 = C48$.
 23. Cell A54. The log suggests other financial sectors are to be excluded from A52, however this creates a miss-match as the use of A50 in the ratio of $A50/A52$ seems to include the contribution of other financial sectors to own funds. Should A45C be deducted from A50 before dividing by A52?

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- 24.Cell A55. The log suggests other financial sectors are to be excluded from A53, however this creates a miss match as the use of A51 in the ratio of A51/A53 seems to include the contribution of other financial sectors to own funds. Should A45C be deducted from A51 before dividing by A53?
- 25.Cell A59. Refers to cell C56 which does not exist.
- 26.Cell D65. Reference in the log to tier 1 should be tier 2.
- 27.Cell A69. Refers to cell C67 which does not exist.
- 28.Cell H78. It is unclear what is meant by counterparty. Can the definition in the log be expanded?
- 29.Cell D86. Reference in the log to tier 3 should be total.
- 30.Cell D87. It is unclear what is meant by counterparty. Can the definition in the log be expanded?
- 31.Row 91. Formulas look wrong. Row 91 holds the subtotals for the table that spans A88 to D90, so we would expect A91 to equal the sum of A88 to A90, B91 to equal the sum of B88 to B90 and so on. However the formulas given are $A91=A88+A89+A90$, $B91=B88+B89+B90$ and so on.
- 32.Cell A95. Formula looks wrong. Cell A95 is for total subordinated liabilities which we would expect to come from the sum of the vertical sub totals (A92 to A94) or the sum of the horizontal sub totals for each tier (B95 + D95 + F95). However the formula given is picking up only one row from each tier and may therefore not represent the total.
- 33.Cell E101. Log refers to subordinated MMA whereas the cell is for subordinated liabilities.
- 34.Cell E101. Items issued by an entity that does not belong to a group would not be considered as a liability in the balance sheet of the group or an item of own funds of the group, so purpose of this cell is unclear.
- 35.Cell H101. It is unclear what is meant by counterparty. Can the definition in the log be expanded?

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- 36.Cell O101. It is unclear exactly what the authorisation would be for. Can the definition in the log be expanded ?
 - 37.Cell R101. Is this different to B101? I.e. is it the contribution to group available own funds after the elimination of any balance issued to another group company and other non availability adjustments?
 - 38.Cell L107. Is this different to B107? I.e. is it the contribution to group available own funds after the elimination of any balance issued to another group company and other non availability adjustments?
 - 39.Cell A112. Log refers to tier 3 whereas cell is total.
 - 40.Cell B112. Log refers to tier 3 whereas cell is total.
 - 41.Cell G114. Log refers to subordinated liability whereas cell does not suggest it is limited to only ancillary subordinated liabilities but open to all ancillary own funds.
 - 42.Cell F115. Formula doesn't seem to work if B115 is greater than (D115 less E115) and at the same time B115 is less than D115. I.e. the formula can lead to Eligible Own Funds which are greater than Basic Own Funds if Shareholder Value is greater than the excess of Own Funds over SCR.
 - 43.Cell D117. Should formula include addition of D116, as log quotes Own funds in ring fenced funds and D116 is outside RFF? Is D117 total entity basic own funds?
 - 44.Cell F117. Should formula also include addition of F116? However log quotes Own funds in ring fenced funds and F116 is outside RFF?
 - 45.Cell F118. D117 and F117 need to be consistent in their inclusion of row 116, otherwise all own funds outside of RFF are deducted as part of RFF adjustment.
- Cell N130.n. This cell seems to be miss-labelled as N130.1.

OF - B1A & B1Q –
Purpose

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OF - B1A & B1Q – Benefits		
OF - B1A & B1Q – Costs		
OF - B1A & B1Q – Groups		
OF - B1A & B1Q – Materiality		
OF - B1A & B1Q - Disclosure		
OF - B1A & B1Q – Frequency		
OF - B1A- cell C1A		
OF - B1A- cell B5		
OF - B1A- cell C5		
OF - B1A- cell D5		
OF - B1A- cell B6	Is this cell applicable to UK insurers?	
OF - B1A- cell B10	The log relates the cell to subordinated mutual member accounts whereas the row in the template relates to preference shares.	
OF - B1A- cell C10	The log relates the cell to tier 1 whereas the cell is in the column for tier 2.	
OF - B1A- cell D10		
OF - B1A- cell B11		
OF - B1A- cell C11		
OF - B1A- cell B14		
OF - B1A- cell C14		
OF - B1A- cell B17		
OF - B1A- cell C17		

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OF - B1A- cell D17		
OF - B1A- cell B18		
OF - B1A- cell C18		
OF - B1A- cell D18		
OF - B1A- cell D14		
OF - B1A- cell D11		
OF - B1A- cell D15		
OF - B1A- cell B25		
OF - B1A- cell B30	Is this for disclosure purposes only as does not feed into total available own funds in row 46 or 48?	
OF - B1A- cell B31	Is this for disclosure purposes only as does not feed into total available own funds in row 46 or 48?	
OF - B1A- cell C33		
OF - B1A- cell C34		
OF - B1A- cell C35		
OF - B1A- cell D35		
OF - B1A- cell C36		
OF - B1A- cell D36		
OF - B1A- cell C37		
OF - B1A- cell C38		
OF - B1A- cell D38		
OF - B1A- cell C39		
OF - B1A- cell C40		
OF - B1A- cell D40		
OF - B1A- cell C41		
OF - B1A- cell D41		

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OF - B1A- cell C42		
OF - B1A- cell D42		
OF - B1A- cell A45	Is this for disclosure purposes only as does not feed into total available own funds in row 48?	
OF - B1A- cell A45A	Is this for disclosure purposes only as does not feed into total available own funds in row 48?	
OF - B1A- cell A45B	Is this for disclosure purposes only as does not feed into total available own funds in row 48?	
OF - B1A- cell B60		
OF - B1A- cell C60		
OF - B1A- cell B61		
OF - B1A- cell C61		
OF - B1A- cell B62		
OF - B1A- cell C62		
OF - B1A- cell B64		
OF - B1A- cell C64		
OF - B1A- cell B65		
OF - B1A- cell C65		
OF - B1A- cell B70		
OF - B1A- cell C70		
OF - B1A- cell B71		
OF - B1A- cell C71		
OF - B1A- cell B73		
OF - B1A- cell C73	Is an item considered to be grandfathered when it has been classified as own funds based on compliance with the transitional provisions as per article 73 TOF1 of the draft implementing measures dated 31 October 2011?	
OF - B1A- cell D73		

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OF - B1A- cell E73	Is an item considered to be grandfathered when it has been classified as own funds based on compliance with the transitional provisions as per article 73 TOF1 of the draft implementing measures dated 31 October 2011?	
OF - B1A- cell F73		
OF - B1A- cell B74		
OF - B1A- cell C74	Is an item considered to be grandfathered when it has been classified as own funds based on compliance with the transitional provisions as per article 73 TOF1 of the draft implementing measures dated 31 October 2011?	
OF - B1A- cell D74		
OF - B1A- cell E74	Is an item considered to be grandfathered when it has been classified as own funds based on compliance with the transitional provisions as per article 73 TOF1 of the draft implementing measures dated 31 October 2011?	
OF - B1A- cell F74		
OF - B1A- cell B75		
OF - B1A- cell C75	Is an item considered to be grandfathered when it has been classified as own funds based on compliance with the transitional provisions as per article 73 TOF1 of the draft implementing measures dated 31 October 2011?	
OF - B1A- cell D75		
OF - B1A- cell E75	Is an item considered to be grandfathered when it has been classified as own funds based on compliance with the transitional provisions as per article 73 TOF1 of the draft implementing measures dated 31 October 2011?	
OF - B1A- cell F75		
OF - B1A- cell A77.1		
OF - B1A- cell B77.1		
OF - B1A- cell C77.1		
OF - B1A- cell D77.1		
OF - B1A- cell E77.1		

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OF - B1A- cell F77.1		
OF - B1A- cell G77.1		
OF - B1A- cell H77.1		
OF - B1A- cell I77.1		
OF - B1A- cell J77.1		
OF - B1A- cell K77.1		
OF - B1A- cell L77.1		
OF - B1A- cell M77.1		
OF - B1A- cell N77.1		
OF - B1A- cell A77.n		
OF - B1A- cell B77.n		
OF - B1A- cell C77.n		
OF - B1A- cell D77.n		
OF - B1A- cell E77.n		
OF - B1A- cell F77.n		
OF - B1A- cell G77.n		
OF - B1A- cell H77.n		
OF - B1A- cell I77.n		
OF - B1A- cell J77.n		
OF - B1A- cell K77.n		
OF - B1A- cell L77.n		
OF - B1A- cell M77.n		
OF - B1A- cell N77.n		
OF - B1A- cell B79		
OF - B1A- cell C79	Is an item considered to be grandfathered when it has been classified as own funds based on compliance with the transitional provisions as per article 73	

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	TOF1 of the draft implementing measures dated 31 October 2011?	
OF - B1A- cell D79		
OF - B1A- cell E79	Is an item considered to be grandfathered when it has been classified as own funds based on compliance with the transitional provisions as per article 73 TOF1 of the draft implementing measures dated 31 October 2011?	
OF - B1A- cell F79		
OF - B1A- cell B80		
OF - B1A- cell C80	Is an item considered to be grandfathered when it has been classified as own funds based on compliance with the transitional provisions as per article 73 TOF1 of the draft implementing measures dated 31 October 2011?	
OF - B1A- cell D80		
OF - B1A- cell E80	Is an item considered to be grandfathered when it has been classified as own funds based on compliance with the transitional provisions as per article 73 TOF1 of the draft implementing measures dated 31 October 2011?	
OF - B1A- cell F80		
OF - B1A- cell B81		
OF - B1A- cell C81	Is an item considered to be grandfathered when it has been classified as own funds based on compliance with the transitional provisions as per article 73 TOF1 of the draft implementing measures dated 31 October 2011?	
OF - B1A- cell D81		
OF - B1A- cell E81	Is an item considered to be grandfathered when it has been classified as own funds based on compliance with the transitional provisions as per article 73 TOF1 of the draft implementing measures dated 31 October 2011?	
OF - B1A- cell F81		
OF - B1A- cell B83		
OF - B1A- cell C83		
OF - B1A- cell D83		

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OF - B1A- cell B84		
OF - B1A- cell C84		
OF - B1A- cell D84		
OF - B1A- cell B85		
OF - B1A- cell C85		
OF - B1A- cell D85		
OF - B1A- cell A87.1		
OF - B1A- cell B87.1		
OF - B1A- cell C87.1		
OF - B1A- cell D87.1		
OF - B1A- cell E87.1		
OF - B1A- cell F87.1		
OF - B1A- cell G87.1		
OF - B1A- cell H87.1		
OF - B1A- cell I87.1		
OF - B1A- cell J87.1		
OF - B1A- cell K87.1		
OF - B1A- cell L87.1		
OF - B1A- cell M87.1		
OF - B1A- cell N87.1		
OF - B1A- cell A87.n		
OF - B1A- cell B87.n		
OF - B1A- cell C87.n		
OF - B1A- cell D87.n		
OF - B1A- cell E87.n		

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OF - B1A- cell F87.n		
OF - B1A- cell G87.n		
OF - B1A- cell H87.n		
OF - B1A- cell I87.n		
OF - B1A- cell J87.n		
OF - B1A- cell K87.n		
OF - B1A- cell L87.n		
OF - B1A- cell M87.n		
OF - B1A- cell N87.n		
OF - B1A- cell B88		
OF - B1A- cell C88		
OF - B1A- cell B89		
OF - B1A- cell B90		
OF - B1A- cell C90		
OF - B1A- cell B92		
OF - B1A- cell C92	Is an item considered to be grandfathered when it has been classified as own funds based on compliance with the transitional provisions as per article 73 TOF1 of the draft implementing measures dated 31 October 2011?	
OF - B1A- cell D92		
OF - B1A- cell E92	Is an item considered to be grandfathered when it has been classified as own funds based on compliance with the transitional provisions as per article 73 TOF1 of the draft implementing measures dated 31 October 2011?	
OF - B1A- cell F92		
OF - B1A- cell B93		
OF - B1A- cell C93	Is an item considered to be grandfathered when it has been classified as own funds based on compliance with the transitional provisions as per article 73 TOF1 of the draft implementing measures dated 31 October 2011?	

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OF - B1A- cell D93		
OF - B1A- cell E93	Is an item considered to be grandfathered when it has been classified as own funds based on compliance with the transitional provisions as per article 73 TOF1 of the draft implementing measures dated 31 October 2011?	
OF - B1A- cell F93		
OF - B1A- cell B94		
OF - B1A- cell C94	Is an item considered to be grandfathered when it has been classified as own funds based on compliance with the transitional provisions as per article 73 TOF1 of the draft implementing measures dated 31 October 2011?	
OF - B1A- cell D94		
OF - B1A- cell E94	Is an item considered to be grandfathered when it has been classified as own funds based on compliance with the transitional provisions as per article 73 TOF1 of the draft implementing measures dated 31 October 2011?	
OF - B1A- cell F94		
OF - B1A- cell B96		
OF - B1A- cell C96		
OF - B1A- cell D96		
OF - B1A- cell E96	Please provide an example of the type of regulatory action that would result in an entry in this cell.	
OF - B1A- cell B97		
OF - B1A- cell C97		
OF - B1A- cell D97		
OF - B1A- cell E97	Please provide an example of the type of regulatory action that would result in an entry in this cell.	
OF - B1A- cell B98		
OF - B1A- cell C98		
OF - B1A- cell D98		

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OF - B1A- cell E98	Please provide an example of the type of regulatory action that would result in an entry in this cell.	
OF - B1A- cell A100.1		
OF - B1A- cell B100.1		
OF - B1A- cell C100.1		
OF - B1A- cell D100.1		
OF - B1A- cell E100.1		
OF - B1A- cell F100.1		
OF - B1A- cell G100.1		
OF - B1A- cell H100.1		
OF - B1A- cell I100.1		
OF - B1A- cell J100.1		
OF - B1A- cell K100.1		
OF - B1A- cell L100.1		
OF - B1A- cell M100.1		
OF - B1A- cell N100.1		
OF - B1A- cell A100.n		
OF - B1A- cell B100.n		
OF - B1A- cell C100.n		
OF - B1A- cell D100.n		
OF - B1A- cell E100.n		
OF - B1A- cell F100.n		
OF - B1A- cell G100.n		
OF - B1A- cell H100.n		
OF - B1A- cell I100.n		
OF - B1A- cell J100.n		

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OF - B1A- cell K100.n		
OF - B1A- cell L100.n		
OF - B1A- cell M100.n		
OF - B1A- cell N100.n		
OF - B1A- cell B102		
OF - B1A- cell C102		
OF - B1A- cell D102		
OF - B1A- cell B103		
OF - B1A- cell C103		
OF - B1A- cell D103		
OF - B1A- cell B104		
OF - B1A- cell C104		
OF - B1A- cell D104		
OF - B1A- cell A106.1		
OF - B1A- cell B106.1		
OF - B1A- cell C106.1		
OF - B1A- cell D106.1		
OF - B1A- cell E106.1		
OF - B1A- cell F106.1		
OF - B1A- cell G106.1		
OF - B1A- cell H106.1		
OF - B1A- cell I106.1		
OF - B1A- cell J106.1		
OF - B1A- cell K106.1		
OF - B1A- cell L106.1		

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OF - B1A- cell M106.1		
OF - B1A- cell N106.1		
OF - B1A- cell A106.n		
OF - B1A- cell B106.n		
OF - B1A- cell C106.n		
OF - B1A- cell D106.n		
OF - B1A- cell E106.n		
OF - B1A- cell F106.n		
OF - B1A- cell G106.n		
OF - B1A- cell H106.n		
OF - B1A- cell I106.n		
OF - B1A- cell J106.n		
OF - B1A- cell K106.n		
OF - B1A- cell L106.n		
OF - B1A- cell M106.n		
OF - B1A- cell N106.n		
OF - B1A- cell A108		
OF - B1A- cell B108		
OF - B1A- cell C108		
OF - B1A- cell B109		
OF - B1A- cell D109		
OF - B1A- cell B110		
OF - B1A- cell C110		
OF - B1A- cell D110		
OF - B1A- cell E110		

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OF - B1A- cell B111		
OF - B1A- cell C111		
OF - B1A- cell D111		
OF - B1A- cell E111		
OF - B1A- cell A113.1		
OF - B1A- cell B113.1		
OF - B1A- cell C113.1		
OF - B1A- cell D113.1		
OF - B1A- cell E113.1		
OF - B1A- cell A113.n		
OF - B1A- cell B113.n		
OF - B1A- cell C113.n		
OF - B1A- cell D113.n		
OF - B1A- cell E113.n		
OF - B1A- cell A115.1		
OF - B1A- cell B115.1		
OF - B1A- cell D115.1		
OF - B1A- cell E115.1		
OF - B1A- cell A115.n		
OF - B1A- cell B115.n		
OF - B1A- cell D115.n		
OF - B1A- cell E115.n		
OF - B1A- cell B116		
OF - B1A- cell D116	For a UK insurer with with profit, non profit and shareholder funds, and where the with profit funds are ring fenced funds, is this the own funds of the non profit and shareholder funds?	

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OF - B1A- cell E116		
OF - B1A- cell F116		
OF - B1A- cell A130.1		
OF - B1A- cell B130.1		
OF - B1A- cell C130.1	What if calculation of non available element of own funds is by reference to the consolidated SCR of a sub group (e.g. Minority Interest adjustment where the minority has an interest in the parent of a sub group)? Do you list all entities in the sub group?	
OF - B1A- cell D130.1		
OF - B1A- cell E130.1		
OF - B1A- cell F130.1		
OF - B1A- cell G130.1		
OF - B1A- cell H130.1		
OF - B1A- cell I130.1		
OF - B1A- cell J130.1		
OF - B1A- cell K130.1		
OF - B1A- cell L130.1		
OF - B1A- cell M130.1		
OF - B1A- cell A130.n		
OF - B1A- cell B130.n		
OF - B1A- cell C130.n		
OF - B1A- cell D130.n		
OF - B1A- cell E130.n		
OF - B1A- cell F130.n		
OF - B1A- cell G130.n		
OF - B1A- cell H130.n		

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OF - B1A- cell I130.n		
OF - B1A- cell J130.n		
OF - B1A- cell K130.n		
OF - B1A- cell L130.n		
OF - B1A- cell M130.n		
OF - B1Q- cell C1A		
OF - B1Q- cell B5		
OF - B1Q- cell C5		
OF - B1Q- cell D5		
OF - B1Q- cell B6		
OF - B1Q- cell B10		
OF - B1Q- cell C10		
OF - B1Q- cell D10		
OF - B1Q- cell B11		
OF - B1Q- cell C11		
OF - B1Q- cell B14		
OF - B1Q- cell C14		
OF - B1Q- cell B17		
OF - B1Q- cell C17		
OF - B1Q- cell D17		
OF - B1Q- cell B18		
OF - B1Q- cell C18		
OF - B1Q- cell D18		
OF - B1Q- cell D14		
OF - B1Q- cell D11		

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OF - B1Q- cell D15		
OF - B1Q- cell B25		
OF - B1Q- cell B30		
OF - B1Q- cell B31		
OF - B1Q- cell C33		
OF - B1Q- cell C34		
OF - B1Q- cell C35		
OF - B1Q- cell D35		
OF - B1Q- cell C36		
OF - B1Q- cell D36		
OF - B1Q- cell C37		
OF - B1Q- cell C38		
OF - B1Q- cell D38		
OF - B1Q- cell C39		
OF - B1Q- cell C40		
OF - B1Q- cell D40		
OF - B1Q- cell C41		
OF - B1Q- cell D41		
OF - B1Q- cell C42		
OF - B1Q- cell D42		
OF - B1Q- cell A45		
OF - B1Q- cell A45A		
OF - B1Q- cell A45B		
VA - C2A- General	As the Variation analysis templates have been completely re-developed, calculation processes have not yet been developed to meet the new requirements. We suggest therefore that a reasonable period of time is	

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	<p>allowed before these templates are required to be reported.</p> <p>The suggested formulas given for V1 to V11 do not pick up numbers from the correct cells on OF B1. For example the variation for ordinary share capital (V1) is calculated as the difference between cells D60 and A60 from OF B1, however this only takes account of paid in (tier 1) share capital and excludes called up but not yet paid in (tier 2) share capital. Also the variation for initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings (V2) is calculated as the difference between cells D65 and A65 from OF B1, however these cells relate to tier 2 share premium on ordinary share capital.</p> <p>Row 11 has the title Variation of total BOF (eligible as in OF-B1, i.e. after adjustments). This title does not make sense as it seems to be asking for basic own funds and eligible own funds at the same time. Should it be total basic own funds after adjustments i.e..cell A20 from OF B1?</p> <p>Can the definition of the reconciliation reserve be made consistent with IFRS?</p> <p>Cashflow based "variation analysis" data does not exist at this level of detail due to the existing accounting convention being accrual based. Requested reports combine accrual basis, cash basis and best estimates. Report requirements will force undertakings to hold double General ledgers – one based on cashflow and one based on accrual. Suggest IFRS accrual basis is adopted.</p>	
VA – C2A – Purpose		
VA – C2A – Benefits		
VA – C2A - Costs		
VA – C2A – Groups		

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VA - C2A – Materiality		
VA - C2A – Disclosure		
VA – C2A – Frequency		
VA - C2B- General	<p>The definitions used are not in line with IFRS. This is a major issue as this refers to transactional data. The impact of providing for cash based data in additiona to accrual based data is major.</p> <p>The need to distinguish between changes in valuation on assets held at opening balance and assets acquired during the year is not required under IFRS and will have a major impact on our transactional systems.</p>	
VA – C2B – Purpose		
VA – C2B – Benefits		
VA – C2B - Costs		
VA – C2B – Groups		
VA - C2B – Materiality		
VA - C2B – Disclosure		
VA – C2B – Frequency		
VA C2B - cell AA2	<p>Please clarify the definition of ‘Investment Management expenses related to recognised Insurance and Reinsurance obligations’ as noted in the Log file.</p>	
VA C2B -cell A1	<p>Are these values Gross or Net of Tax? If Gross we need to bring tax paid into the calculation. Values may not tie to IFRS due to Unit-linked values not being included on this template.</p> <p>Log file indicates that values are reported on a cash basis, accepted accounting practice is on an Accrual basis – in line with IFRS reporting. Will not tie to Balance Sheet. Please advise how accrued interest is accounted for.</p> <p>Please clarify the definition of ‘Investment Management expenses related to recognised Insurance and Reinsurance obligations’</p>	
VA C2B -cell A2	<p>Are these values Gross or Net of Tax? If Gross we need to bring tax paid into</p>	

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	the calculation. Values may not tie to IFRS due to Unit-linked values not being included on this template. Log file indicates that values are reported on a cash basis, accepted accounting practice is on an Accrual basis – in line with IFRS reporting. Will not tie to Balance Sheet. Please advise how accrued interest is accounted for.	
VA C2B -cell A3	Are these values Gross or Net of Tax? If Gross we need to bring tax paid into the calculation. Values may not tie to IFRS due to Unit-linked values not being included on this template. Log file indicates that values are reported on a cash basis, accepted accounting practice is on an Accrual basis – in line with IFRS reporting. Will not tie to Balance Sheet. Please advise how accrued interest is accounted for.	
VA C2B -cell A4	Are these values Gross or Net of Tax? If Gross we need to bring tax paid into the calculation. Values may not tie to IFRS due to Unit-linked values not being included on this template. Log file indicates that values are reported on a cash basis, accepted accounting practice is on an Accrual basis – in line with IFRS reporting. Will not tie to Balance Sheet. Please advise how accrued interest is accounted for.	
VA C2B -cell A6	What is the benefit of splitting Unrealised gains on Investments between Assets held at opening date and Assets acquired during the period? They should be aggregated.	
VA C2B -cell A7		
VA C2B -cell A8	What is the benefit of splitting Unrealised gains on Investments between Assets held at opening date and Assets acquired during the period? They should be aggregated.	
VA C2B -cell O1		
VA C2B -cell O2		
VA C2B -cell O3		
VA - C2C- General	For Cell I1 – Please advise why this value is included when we are reporting by Line of Business? It will only be relevant for one Line of Business.	

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	Should formula in CC7 be CC7 = G2?	
VA - C2C - Purpose		
VA - C2C - Benefits		
VA - C2C - Costs		
VA - C2C - Groups		
VA - C2C - Materiality		
VA - C2C - Disclosure		
VA - C2C - Frequency		
VA C2C -cell AA5		
VA C2C -cell A1		
VA C2C -cell B1		
VA C2C -cell C1		
VA C2C -cell D1		
VA C2C -cell E1		
VA C2C -cell E1A		
VA C2C -cell G1	Please advise how reinsurance cashflows (premiums) paid to reinsurers are accounted for in this template.	
VA C2C -cell H1	Please advise how reinsurance cashflows (premiums) paid to reinsurers are accounted for in this template.	
VA C2C -cell E1A		
VA C2C -cell A2		
VA C2C -cell B2		
VA C2C -cell D2		
VA C2C -cell E2		
VA C2C -cell G2		
VA C2C -cell A3		

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VA C2C -cell B3		
VA C2C -cell C3		
VA C2C -cell A4		
VA C2C -cell B4		
VA C2C -cell C4		
VA C2C -cell D4		
VA C2C -cell E4		
VA C2C -cell E4A		
VA C2C -cell G4		
VA C2C -cell H4		
VA C2C -cell BB1		
VA C2C -cell CC1		
VA - C2D- General		
VA - C2D - Purpose		
VA - C2D - Benefits		
VA - C2D - Costs		
VA - C2D - Groups		
VA - C2D - Materiality		
VA - C2D - Disclosure		
VA - C2D - Frequency		
VA C2D -cell O2		
VA C2D -cell O3		
VA C2D -cell O4		
VA C2D -cell O6		
VA C2D -cell O7		

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VA C2D -cell O8		
VA C2D -cell O9		
VA C2D -cell O10		
VA C2D -cell O11		
VA C2D -cell O12		
SCR - B2A – General	Please clarify the applicability of SCR-B2A, B2B and B2C for entities where: a) Certain funds are on Full Internal Model and other funds are on Standard Formula / Partial Internal Model b) All funds are on Full Internal Model but some component (e.g. Operational Risk) is on Standard Formula	
SCR - B2A – Purpose		
SCR - B2A – Benefits		
SCR - B2A – Costs		
SCR - B2A – Groups		
SCR - B2A – Materiality		
SCR - B2A - Disclosure		
SCR - B2A – Frequency		
SCR - B2A - cell A1		
SCR - B2A - cell B1		
SCR - B2A - cell A2		
SCR - B2A - cell B2		
SCR - B2A - cell A3		
SCR - B2A - cell B3		
SCR - B2A - cell A4		

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SCR - B2A - cell B4		
SCR - B2A - cell A5		
SCR - B2A - cell B5=A5		
SCR - B2A - cell A6		
SCR - B2A - cell B6		
SCR - B2A - cell A7		
SCR - B2A - cell B7=A7		
SCR - B2A - cell A8		
SCR - B2A - cell B8		
SCR - B2A - cell A9		
SCR - B2A - cell B9		
SCR - B2A - cell A11		
SCR - B2A - cell A12		
SCR - B2A - cell A13		
SCR - B2A - cell A14	Does this mean that Notional SCR for all Ring fenced funds is included in cell A14 and cell A1 to A13 include SCR related to risks in Non Ring fenced funds?	
SCR - B2A - cell A14A	'Diversification within ring-fenced funds' – Please clarify – Is this within or between ring-fenced funds?	
SCR - B2A - cell A15A	'Credit institutions & investment firms and financial institutions' – This is covered in the Own Funds QRT. Is this double-counted? Please clarify the treatment of Participations (for Own Funds and SCR QRTs) in: a) Credit Institutions and Investment firms b) Insurers c) Other firms	
SCR - B2A - cell A15B		
SCR - B2A - cell A15C		

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SCR - B2A - cell A16		
SCR - B2A - cell A17		
SCR - B2A - cell A18	Formula required	
SCR - B2A - cell A19		
SCR - B2A - cell A20	Formula required	
SCR - B2A - cell A21		
SCR - B2B - General		
SCR - B2B - Purpose		
SCR - B2B - Benefits		
SCR - B2B - Costs		
SCR - B2B - Groups		
SCR - B2B - Materiality		
SCR - B2B - Disclosure		
SCR - B2B - Frequency		
SCR - B2B- cell A1.1		
SCR - B2B- cell A1A.1		
SCR - B2B- cell B1.1		
SCR - B2B- cell A1.n		
SCR - B2B- cell A1A.n		
SCR - B2B- cell B1.n		
SCR - B2B- cell B3		
SCR - B2B- cell B5		
SCR - B2B- cell B6		

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SCR - B2B- cell B8		
SCR - B2C - General		
SCR - B2C - Purpose		
SCR - B2C - Benefits		
SCR - B2C - Costs		
SCR - B2C - Groups		
SCR - B2C - Materiality		
SCR - B2C- Disclosure		
SCR - B2C - Frequency		
SCR - B2C- cell A1.1		
SCR - B2C- cell A1A.1		
SCR - B2C- cell B1.1		
SCR - B2C- cell A1.n		
SCR - B2C- cell A1A.n		
SCR - B2C- cell B1.n		
SCR - B2C- cell B3		
SCR - B2C- cell B5		
SCR - B2C- cell B6		
SCR - B2C- cell B7	Does this mean that Notional SCR for all Ring fenced funds is included in cell B7 and cell B1 includes SCR related to risks in Non Ring fenced funds?	
SCR - B2C- cell B7A	'Diversification within ring-fenced funds' - Please clarify - Is this within or between ring-fenced funds?	
SCR - B2C- cell B8A	'Credit institutions & investment firms and financial institutions' - This is covered in the Own Funds QRT. Is this double-counted?	

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	<p>Please clarify the treatment of Participations (for Own Funds and SCR QRTs) in:</p> <ul style="list-style-type: none"> a) Credit Institutions and Investment firms b) Insurers c) Other firms 	
SCR - B2C- cell B8B		
SCR - B2C- cell B8C		
SCR - B2C- cell B9		
SCR - B2C- cell B10		
SCR - B2C- cell B11		
SCR - B2C- cell B13		
SCR - B2C- cell B14		
SCR - B2C- cell B15		
SCR - B3A – General	<p>Comments indicate that template should not include subordinated liabilities. Does this refer to:</p> <ul style="list-style-type: none"> • All subordinated liabilities <p>or</p> <ul style="list-style-type: none"> • Only subordinated liabilities in Basic Own Funds <p>Is a split of Assets & Liabilities required according to exposure to risk sub-category? Not sure that it makes sense to split liabilities according to exposure to risk sub-category. Suggest that total Asset and Liabilities values are used here.</p> <p>Please confirm whether ring-fenced funds should be included in this template.</p>	
SCR - B3A – Purpose		
SCR - B3A – Benefits		

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SCR - B3A - Costs		
SCR - B3A - Groups		
SCR - B3A - Materiality		
SCR - B3A - Disclosure		
SCR - B3A - Frequency		
SCR - B3A- cell CO		
SCR - B3A- cell D0		
SCR - B3A- cell A1		
SCR - B3A- cell A1A		
SCR - B3A- cell B1		
SCR - B3A- cell B1A		
SCR - B3A- cell C1		
SCR - B3A- cell B1B		
SCR - B3A- cell D1		
SCR - B3A- cell A2		
SCR - B3A- cell A2A		
SCR - B3A- cell B2		
SCR - B3A- cell B2A		
SCR - B3A- cell C2		
SCR - B3A- cell B2B		
SCR - B3A- cell D2		
SCR - B3A- cell C3		
SCR - B3A- cell D3		
SCR - B3A- cell A4		

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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 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		

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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		

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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 A21	Should there be a matching premium risk?	
SCR - B3A- cell A21A		
SCR - B3A- cell B21		
SCR - B3A- cell B21A		

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SCR - B3A- cell C21		
SCR - B3A- cell B21B		
SCR - B3A- cell D21		
SCR - B3A- cell C22		
SCR - B3A- cell D22		
SCR - B3A- cell C23		
SCR - B3A- cell D23		
SCR - B3B – General		
SCR - B3B – Purpose		
SCR - B3B – Benefits		
SCR - B3B – Costs		
SCR - B3B – Groups		
SCR - B3B – Materiality		
SCR - B3B - Disclosure		
SCR - B3B – Frequency		
SCR - B3B- cell A0		
SCR - B3B- cell B0	Please provide the formula here – Is this the sum of the cells A1 – A4 below.	
SCR - B3B- cell A1		
SCR - B3B- cell A1A		
SCR - B3B- cell A2		
SCR - B3B- cell A3		
SCR - B3B- cell A4		
SCR - B3B- cell B6		

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SCR - B3B- cell A7		
SCR - B3B- cell A8		
SCR - B3B- cell A9		
SCR - B3B- cell B9		
SCR - B3C - General	Is a split of Assets & Liabilities required according to exposure to risk sub-category?	
SCR - B3C - Purpose		
SCR - B3C - Benefits		
SCR - B3C - Costs		
SCR - B3C - Groups		
SCR - B3C - Materiality		
SCR - B3C - Disclosure		
SCR - B3C - Frequency		
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		

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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		

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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		

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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 - B3C- cell A12		
SCR - B3D – General		
SCR - B3D – Purpose		
SCR - B3D – Benefits		
SCR - B3D – Costs		
SCR - B3D – Groups		
SCR - B3D – Materiality		
SCR - B3D - Disclosure		
SCR - B3D – Frequency		
SCR - B3D- cell A12		
SCR - B3D- cell A12A		
SCR - B3D- cell B12		
SCR - B3D- cell C12		
SCR - B3D- cell D12		
SCR - B3D- cell E12		

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SCR - B3D- cell F12		
SCR - B3D- cell A13		
SCR - B3D- cell A13A		
SCR - B3D- cell B13		
SCR - B3D- cell C13		
SCR - B3D- cell D13		
SCR - B3D- cell E13		
SCR - B3D- cell F13		
SCR - B3D- cell A14		
SCR - B3D- cell A14A		
SCR - B3D- cell B14		
SCR - B3D- cell C14		
SCR - B3D- cell D14		
SCR - B3D- cell E14		
SCR - B3D- cell F14		
SCR - B3D- cell A15		
SCR - B3D- cell A15A		
SCR - B3D- cell B15		
SCR - B3D- cell C15		
SCR - B3D- cell D15		
SCR - B3D- cell E15		
SCR - B3D- cell F15		
SCR - B3D- cell A16		
SCR - B3D- cell A17		
SCR - B3D- cell A18		

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SCR - B3D- cell A18A		
SCR - B3D- cell B18		
SCR - B3D- cell B18A		
SCR - B3D- cell C18		
SCR - B3D- cell A19		
SCR - B3D- cell A20		
SCR - B3D- cell A21		
SCR - B3D- cell A22		
SCR - B3D- cell A23		
SCR - B3D- cell A24		
SCR - B3D- cell A25		
SCR - B3D- cell A26		
SCR - B3D- cell A27		
SCR - B3E – General		
SCR - B3E – Purpose		
SCR - B3E – Benefits		
SCR - B3E – Costs		
SCR - B3E – Groups		
SCR - B3E – Materiality		
SCR - B3E - Disclosure		
SCR - B3E – Frequency		
SCR - B3E- cell A1		
SCR - B3E- cell A1A		

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SCR - B3E- cell B1		
SCR - B3E- cell C1		
SCR - B3E- cell D1		
SCR - B3E- cell E1		
SCR - B3E- cell F1		
SCR - B3E- cell A2		
SCR - B3E- cell A2A		
SCR - B3E- cell B2		
SCR - B3E- cell C2		
SCR - B3E- cell D2		
SCR - B3E- cell E2		
SCR - B3E- cell F2		
SCR - B3E- cell A3		
SCR - B3E- cell A3A		
SCR - B3E- cell B3		
SCR - B3E- cell C3		
SCR - B3E- cell D3		
SCR - B3E- cell E3		
SCR - B3E- cell F3		
SCR - B3E- cell A4		
SCR - B3E- cell A4A		
SCR - B3E- cell B4		
SCR - B3E- cell C4		
SCR - B3E- cell D4		
SCR - B3E- cell E4		

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SCR - B3E- cell F4		
SCR - B3E- cell A5		
SCR - B3E- cell A5A		
SCR - B3E- cell B5		
SCR - B3E- cell C5		
SCR - B3E- cell D5		
SCR - B3E- cell E5		
SCR - B3E- cell F5		
SCR - B3E- cell A6		
SCR - B3E- cell A6A		
SCR - B3E- cell B6		
SCR - B3E- cell C6		
SCR - B3E- cell D6		
SCR - B3E- cell E6		
SCR - B3E- cell F6		
SCR - B3E- cell A7		
SCR - B3E- cell A7A		
SCR - B3E- cell B7		
SCR - B3E- cell C7		
SCR - B3E- cell D7		
SCR - B3E- cell E7		
SCR - B3E- cell F7		
SCR - B3E- cell A8		
SCR - B3E- cell A8A		
SCR - B3E- cell B8		

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SCR - B3E- cell C8		
SCR - B3E- cell D8		
SCR - B3E- cell E8		
SCR - B3E- cell F8		
SCR - B3E- cell A9		
SCR - B3E- cell A9A		
SCR - B3E- cell B9		
SCR - B3E- cell C9		
SCR - B3E- cell D9		
SCR - B3E- cell E9		
SCR - B3E- cell F9		
SCR - B3E- cell A10		
SCR - B3E- cell A10A		
SCR - B3E- cell B10		
SCR - B3E- cell C10		
SCR - B3E- cell D10		
SCR - B3E- cell E10		
SCR - B3E- cell F10		
SCR - B3E- cell A11		
SCR - B3E- cell A11A		
SCR - B3E- cell B11		
SCR - B3E- cell C11		
SCR - B3E- cell D11		
SCR - B3E- cell E11		
SCR - B3E- cell F11		

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SCR - B3E- cell A12		
SCR - B3E- cell A12A		
SCR - B3E- cell B12		
SCR - B3E- cell C12		
SCR - B3E- cell D12		
SCR - B3E- cell E12		
SCR - B3E- cell F12		
SCR - B3E- cell A13		
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		
SCR - B3F – Purpose		
SCR - B3F – Benefits		
SCR - B3F – Costs		
SCR - B3F – Groups		
SCR - B3F – Materiality		

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SCR - B3F - Disclosure		
SCR - B3F - Frequency		
SCR - B3F- cell Summary A1		
SCR - B3F- cell Summary C1		
SCR - B3F- cell Summary A9		
SCR - B3F- cell Summary C9		
SCR - B3F- cell Summary A17		
SCR - B3F- cell Summary C17		
SCR - B3F- cell Summary A26		
SCR - B3F- cell Summary C26		
SCR - B3F- cell Summary A27		
SCR - B3F- cell Summary C27		
SCR - B3F- cell Windstorm A1		
SCR - B3F- cell Windstorm B1		
SCR - B3F- cell Windstorm C1		

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SCR - B3F- cell Windstorm E1		
SCR - B3F- cell Windstorm F1		
SCR - B3F- cell Windstorm G1		
SCR - B3F- cell Windstorm H1		
SCR - B3F- cell Windstorm A2		
SCR - B3F- cell Windstorm B2		
SCR - B3F- cell Windstorm C2		
SCR - B3F- cell Windstorm E2		
SCR - B3F- cell Windstorm F2		
SCR - B3F- cell Windstorm G2		
SCR - B3F- cell Windstorm H2		
SCR - B3F- cell Windstorm A3		
SCR - B3F- cell Windstorm B3		
SCR - B3F- cell Windstorm C3		
SCR - B3F- cell		

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Windstorm E3		
SCR - B3F- cell Windstorm F3		
SCR - B3F- cell Windstorm G3		
SCR - B3F- cell Windstorm H3		
SCR - B3F- cell Windstorm A20		
SCR - B3F- cell Windstorm B20		
SCR - B3F- cell Windstorm C20		
SCR - B3F- cell Windstorm E20		
SCR - B3F- cell Windstorm F20		
SCR - B3F- cell Windstorm G20		
SCR - B3F- cell Windstorm H20		
SCR - B3F- cell Windstorm A22		
SCR - B3F- cell Windstorm F22		
SCR - B3F- cell Windstorm G22		
SCR - B3F- cell Windstorm H22		

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SCR - B3F- cell Windstorm I22		
SCR - B3F- cell Windstorm F25		
SCR - B3F- cell Windstorm I25		
SCR - B3F- cell Earthquake A1		
SCR - B3F- cell Earthquake B1		
SCR - B3F- cell Earthquake C1		
SCR - B3F- cell Earthquake E1		
SCR - B3F- cell Earthquake F1		
SCR - B3F- cell Earthquake G1		
SCR - B3F- cell Earthquake A2		
SCR - B3F- cell Earthquake B2		
SCR - B3F- cell Earthquake C2		
SCR - B3F- cell Earthquake E2		
SCR - B3F- cell Earthquake F2		
SCR - B3F- cell		

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Earthquake G2		
SCR - B3F- cell Earthquake A3		
SCR - B3F- cell Earthquake B3		
SCR - B3F- cell Earthquake C3		
SCR - B3F- cell Earthquake E3		
SCR - B3F- cell Earthquake F3		
SCR - B3F- cell Earthquake G3		
SCR - B3F- cell Earthquake A20		
SCR - B3F- cell Earthquake B20		
SCR - B3F- cell Earthquake C20		
SCR - B3F- cell Earthquake E20		
SCR - B3F- cell Earthquake F20		
SCR - B3F- cell Earthquake G20		
SCR - B3F- cell Earthquake A22		
SCR - B3F- cell Earthquake E22		

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SCR - B3F- cell Earthquake F22		
SCR - B3F- cell Earthquake G22		
SCR - B3F- cell Earthquake H22		
SCR - B3F- cell Earthquake E25		
SCR - B3F- cell Earthquake H25		
SCR - B3F- cell Flood A1		
SCR - B3F- cell Flood B1		
SCR - B3F- cell Flood C1		
SCR - B3F- cell Flood E1		
SCR - B3F- cell Flood F1		
SCR - B3F- cell Flood G1		
SCR - B3F- cell Flood H1		
SCR - B3F- cell Flood A2		
SCR - B3F- cell Flood B2		
SCR - B3F- cell Flood C2		
SCR - B3F- cell Flood E2		
SCR - B3F- cell Flood F2		
SCR - B3F- cell Flood G2		
SCR - B3F- cell Flood H2		
SCR - B3F- cell Flood A3		
SCR - B3F- cell Flood B3		
SCR - B3F- cell Flood C3		

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SCR - B3F- cell Flood E3		
SCR - B3F- cell Flood F3		
SCR - B3F- cell Flood G3		
SCR - B3F- cell Flood H3		
SCR - B3F- cell Flood A20		
SCR - B3F- cell Flood B20		
SCR - B3F- cell Flood C20		
SCR - B3F- cell Flood E20		
SCR - B3F- cell Flood F20		
SCR - B3F- cell Flood G20		
SCR - B3F- cell Flood H20		
SCR - B3F- cell Flood A22		
SCR - B3F- cell Flood F22		
SCR - B3F- cell Flood G22		
SCR - B3F- cell Flood H22		
SCR - B3F- cell Flood I22		
SCR - B3F- cell Flood F25		
SCR - B3F- cell Flood I25		
SCR - B3F- cell Hail A1		

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SCR - B3F- cell Hail B1		
SCR - B3F- cell Hail C1		
SCR - B3F- cell Hail E1		
SCR - B3F- cell Hail F1		
SCR - B3F- cell Hail G1		
SCR - B3F- cell Hail H1		
SCR - B3F- cell Hail A2		
SCR - B3F- cell Hail B2		
SCR - B3F- cell Hail C2		
SCR - B3F- cell Hail E2		
SCR - B3F- cell Hail F2		
SCR - B3F- cell Hail G2		
SCR - B3F- cell Hail H2		
SCR - B3F- cell Hail A3		
SCR - B3F- cell Hail B3		
SCR - B3F- cell Hail C3		
SCR - B3F- cell Hail E3		
SCR - B3F- cell Hail F3		
SCR - B3F- cell Hail G3		
SCR - B3F- cell Hail H3		
SCR - B3F- cell Hail A20		
SCR - B3F- cell Hail B20		
SCR - B3F- cell Hail C20		
SCR - B3F- cell Hail E20		
SCR - B3F- cell Hail F20		

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SCR - B3F- cell Hail G20		
SCR - B3F- cell Hail H20		
SCR - B3F- cell Hail A22		
SCR - B3F- cell Hail F22		
SCR - B3F- cell Hail G22		
SCR - B3F- cell Hail H22		
SCR - B3F- cell Hail I22		
SCR - B3F- cell Hail F25		
SCR - B3F- cell Hail I25		
SCR - B3F- cell Subsidence A1		
SCR - B3F- cell Subsidence B1		
SCR - B3F- cell Subsidence C1		
SCR - B3F- cell Subsidence F1		
SCR - B3F- cell Subsidence G1		
SCR - B3F- cell Subsidence H1		
SCR - B3F- cell Subsidence E3		
SCR - B3F- cell Subsidence H3		
SCR - B3F- cell Non- proportional property reinsurance A1		

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SCR - B3F- cell Non-proportional property reinsurance B1		
SCR - B3F- cell Non-proportional property reinsurance C1		
SCR - B3F- cell Non-proportional property reinsurance D1		
SCR - B3F- cell Motor Vehicle Liability A1		
SCR - B3F- cell Motor Vehicle Liability A2		
SCR - B3F- cell Motor Vehicle Liability A3		
SCR - B3F- cell Motor Vehicle Liability A4		
SCR - B3F- cell Motor Vehicle Liability A5		
SCR - B3F- cell Marine Tanker Collision A1		
SCR - B3F- cell Marine Tanker Collision B1		
SCR - B3F- cell Marine Tanker Collision C1		
SCR - B3F- cell Marine Tanker Collision A2		
SCR - B3F- cell Marine Tanker Collision B2		

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SCR - B3F- cell Marine Tanker Collision C2		
SCR - B3F- cell Marine Tanker Collision A3		
SCR - B3F- cell Marine Tanker Collision B3		
SCR - B3F- cell Marine Tanker Collision C3		
SCR - B3F- cell Marine Platform Explosion A5		
SCR - B3F- cell Marine Platform Explosion B5		
SCR - B3F- cell Marine Platform Explosion C5		
SCR - B3F- cell Marine Platform Explosion D5		
SCR - B3F- cell Marine Platform Explosion E5		
SCR - B3F- cell Marine Platform Explosion A6		
SCR - B3F- cell Marine Platform Explosion B6		
SCR - B3F- cell Marine Platform Explosion C6		
SCR - B3F- cell Marine Platform Explosion D6		
SCR - B3F- cell Marine Platform Explosion E6		
SCR - B3F- cell Marine		

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Platform Explosion A7		
SCR - B3F- cell Marine Platform Explosion B7		
SCR - B3F- cell Marine Platform Explosion C7		
SCR - B3F- cell Marine Platform Explosion D7		
SCR - B3F- cell Marine Platform Explosion E7		
SCR - B3F- cell Marine C9		
SCR - B3F- cell Marine C11		
SCR - B3F- cell Aviation A1		
SCR - B3F- cell Aviation B1		
SCR - B3F- cell Aviation A2		
SCR - B3F- cell Aviation B2		
SCR - B3F- cell Aviation A3		
SCR - B3F- cell Aviation B3		
SCR - B3F- cell Fire A1		
SCR - B3F- cell Fire A2		
SCR - B3F- cell Fire A3		

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SCR - B3F- cell Liability A1		
SCR - B3F- cell Liability B1		
SCR - B3F- cell Liability C1		
SCR - B3F- cell Liability D1		
SCR - B3F- cell Liability E1		
SCR - B3F- cell Liability A2		
SCR - B3F- cell Liability B2		
SCR - B3F- cell Liability C2		
SCR - B3F- cell Liability D2		
SCR - B3F- cell Liability E2		
SCR - B3F- cell Liability A3		
SCR - B3F- cell Liability B3		
SCR - B3F- cell Liability C3		
SCR - B3F- cell Liability D3		
SCR - B3F- cell Liability		

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E3		
SCR - B3F- cell Liability A4		
SCR - B3F- cell Liability B4		
SCR - B3F- cell Liability C4		
SCR - B3F- cell Liability D4		
SCR - B3F- cell Liability E4		
SCR - B3F- cell Liability A1		
SCR - B3F- cell Liability A5		
SCR - B3F- cell Liability B5		
SCR - B3F- cell Liability C5		
SCR - B3F- cell Liability D5		
SCR - B3F- cell Liability E5		
SCR - B3F- cell Liability A6		
SCR - B3F- cell Liability B6		
SCR - B3F- cell Liability C6		

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SCR - B3F- cell Liability D6		
SCR - B3F- cell Liability E6		
SCR - B3F- cell Liability A8		
SCR - B3F- cell Liability B8		
SCR - B3F- cell Liability C8		
SCR - B3F- cell Liability D8		
SCR - B3F- cell Liability E8		
SCR - B3F- cell Liability A9		
SCR - B3F- cell Liability B9		
SCR - B3F- cell Liability C9		
SCR - B3F- cell Liability D9		
SCR - B3F- cell Liability E9		
SCR - B3F- cell Liability A10		
SCR - B3F- cell Liability B10		
SCR - B3F- cell Liability		

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C10		
SCR - B3F- cell Liability D10		
SCR - B3F- cell Liability E10		
SCR - B3F- cell Liability A12		
SCR - B3F- cell Liability B12		
SCR - B3F- cell Liability C12		
SCR - B3F- cell Liability D12		
SCR - B3F- cell Liability E12		
SCR - B3F- cell Liability H12		
SCR - B3F- cell Liability A14		
SCR - B3F- cell Liability B14		
SCR - B3F- cell Liability C14		
SCR - B3F- cell Liability D14		
SCR - B3F- cell Liability E14		
SCR - B3F- cell Liability H14		

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SCR - B3F- cell Credit & Suretyship Large Credit Default A1		
SCR - B3F- cell Credit & Suretyship Large Credit Default B1		
SCR - B3F- cell Credit & Suretyship Large Credit Default A2		
SCR - B3F- cell Credit & Suretyship Large Credit Default B2		
SCR - B3F- cell Credit & Suretyship Large Credit Default A4		
SCR - B3F- cell Credit & Suretyship Large Credit Default B4		
SCR - B3F- cell Credit & Suretyship Large Credit Default A5		
SCR - B3F- cell Credit & Suretyship Large Credit Default B5		
SCR - B3F- cell Credit & Suretyship Recession Risk A7		
SCR - B3F- cell Credit & Suretyship Recession		

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Risk A8		
SCR - B3F- cell Credit & Suretyship Recession Risk A9		
SCR - B3F- cell Credit & Suretyship Recession Risk A10		
SCR - B3F- cell Credit & Suretyship C12		
SCR - B3F- cell Credit & Suretyship C14		
SCR - B3F- cell Other non-life catastrophe risk A1		
SCR - B3F- cell Other non-life catastrophe risk B1		
SCR - B3F- cell Other non-life catastrophe risk C1		
SCR - B3F- cell Other non-life catastrophe risk D1		
SCR - B3F- cell Other non-life catastrophe risk E1		
SCR - B3F- cell Other non-life catastrophe risk A2		

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SCR - B3F- cell Other non-life catastrophe risk B2		
SCR - B3F- cell Other non-life catastrophe risk C2		
SCR - B3F- cell Other non-life catastrophe risk D2		
SCR - B3F- cell Other non-life catastrophe risk E2		
SCR - B3F- cell Other non-life catastrophe risk H2		
SCR - B3F- cell Other non-life catastrophe risk A4		
SCR - B3F- cell Other non-life catastrophe risk B4		
SCR - B3F- cell Other non-life catastrophe risk C4		
SCR - B3F- cell Other non-life catastrophe risk D4		
SCR - B3F- cell Other non-life catastrophe risk		

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E4		
SCR - B3F- cell Other non-life catastrophe risk H4		
SCR - B3F- cell Mass Accident A1		
SCR - B3F- cell Mass Accident B1		
SCR - B3F- cell Mass Accident C1		
SCR - B3F- cell Mass Accident D1		
SCR - B3F- cell Mass Accident E1		
SCR - B3F- cell Mass Accident F1		
SCR - B3F- cell Mass Accident G1		
SCR - B3F- cell Mass Accident H1		
SCR - B3F- cell Mass Accident I1		
SCR - B3F- cell Mass Accident J1		
SCR - B3F- cell Mass Accident K1		
SCR - B3F- cell Mass Accident L1		
SCR - B3F- cell Mass		

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Accident M1		
SCR - B3F- cell Mass Accident A2		
SCR - B3F- cell Mass Accident B2		
SCR - B3F- cell Mass Accident C2		
SCR - B3F- cell Mass Accident D2		
SCR - B3F- cell Mass Accident E2		
SCR - B3F- cell Mass Accident F2		
SCR - B3F- cell Mass Accident G2		
SCR - B3F- cell Mass Accident H2		
SCR - B3F- cell Mass Accident I2		
SCR - B3F- cell Mass Accident J2		
SCR - B3F- cell Mass Accident K2		
SCR - B3F- cell Mass Accident L2		
SCR - B3F- cell Mass Accident M2		
SCR - B3F- cell Mass Accident A3		

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SCR - B3F- cell Mass Accident B3		
SCR - B3F- cell Mass Accident C3		
SCR - B3F- cell Mass Accident D3		
SCR - B3F- cell Mass Accident E3		
SCR - B3F- cell Mass Accident F3		
SCR - B3F- cell Mass Accident G3		
SCR - B3F- cell Mass Accident H3		
SCR - B3F- cell Mass Accident I3		
SCR - B3F- cell Mass Accident J3		
SCR - B3F- cell Mass Accident K3		
SCR - B3F- cell Mass Accident L3		
SCR - B3F- cell Mass Accident M3		
SCR - B3F- cell Mass Accident A20		
SCR - B3F- cell Mass Accident B20		
SCR - B3F- cell Mass		

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Accident C20		
SCR - B3F- cell Mass Accident D20		
SCR - B3F- cell Mass Accident E20		
SCR - B3F- cell Mass Accident F20		
SCR - B3F- cell Mass Accident G20		
SCR - B3F- cell Mass Accident H20		
SCR - B3F- cell Mass Accident I20		
SCR - B3F- cell Mass Accident J20		
SCR - B3F- cell Mass Accident K20		
SCR - B3F- cell Mass Accident L20		
SCR - B3F- cell Mass Accident M20		
SCR - B3F- cell Mass Accident K22		
SCR - B3F- cell Mass Accident N22		
SCR - B3F- cell Concentration Accident A1		
SCR - B3F- cell		

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Concentration Accident B1		
SCR - B3F- cell Concentration Accident C1		
SCR - B3F- cell Concentration Accident D1		
SCR - B3F- cell Concentration Accident E1		
SCR - B3F- cell Concentration Accident F1		
SCR - B3F- cell Concentration Accident G1		
SCR - B3F- cell Concentration Accident H1		
SCR - B3F- cell Concentration Accident I1		
SCR - B3F- cell Concentration Accident A2		
SCR - B3F- cell Concentration Accident B2		

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SCR - B3F- cell Concentration Accident C2		
SCR - B3F- cell Concentration Accident D2		
SCR - B3F- cell Concentration Accident E2		
SCR - B3F- cell Concentration Accident F2		
SCR - B3F- cell Concentration Accident G2		
SCR - B3F- cell Concentration Accident H2		
SCR - B3F- cell Concentration Accident I2		
SCR - B3F- cell Concentration Accident A3		
SCR - B3F- cell Concentration Accident B3		
SCR - B3F- cell Concentration Accident		

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C3		
SCR - B3F- cell Concentration Accident D3		
SCR - B3F- cell Concentration Accident E3		
SCR - B3F- cell Concentration Accident F3		
SCR - B3F- cell Concentration Accident G3		
SCR - B3F- cell Concentration Accident H3		
SCR - B3F- cell Concentration Accident I3		
SCR - B3F- cell Concentration Accident A20		
SCR - B3F- cell Concentration Accident B20		
SCR - B3F- cell Concentration Accident C20		
SCR - B3F- cell		

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Concentration Accident D20		
SCR - B3F- cell Concentration Accident E20		
SCR - B3F- cell Concentration Accident F20		
SCR - B3F- cell Concentration Accident G20		
SCR - B3F- cell Concentration Accident H20		
SCR - B3F- cell Concentration Accident I20		
SCR - B3F- cell Concentration Accident G22		
SCR - B3F- cell Concentration Accident J22		
SCR - B3F- cell Pandemic A1		
SCR - B3F- cell Pandemic B1		
SCR - B3F- cell Pandemic C1		

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SCR - B3F- cell Pandemic D1		
SCR - B3F- cell Pandemic E1		
SCR - B3F- cell Pandemic F1		
SCR - B3F- cell Pandemic A2		
SCR - B3F- cell Pandemic B2		
SCR - B3F- cell Pandemic C2		
SCR - B3F- cell Pandemic D2		
SCR - B3F- cell Pandemic E2		
SCR - B3F- cell Pandemic F2		
SCR - B3F- cell Pandemic A3		
SCR - B3F- cell Pandemic B3		
SCR - B3F- cell Pandemic C3		
SCR - B3F- cell Pandemic D3		
SCR - B3F- cell Pandemic E3		
SCR - B3F- cell Pandemic		

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F2		
SCR - B3F- cell Pandemic A20		
SCR - B3F- cell Pandemic B20		
SCR - B3F- cell Pandemic C20		
SCR - B3F- cell Pandemic D20		
SCR - B3F- cell Pandemic E20		
SCR - B3F- cell Pandemic F20		
SCR - B3F- cell Pandemic F21		
SCR - B3F- cell Pandemic D22		
SCR - B3F- cell Pandemic G22		
SCR - B3G – General	There should be a consistency in terminology used within the templates, for example: “earned premium” used here (lines A5 to A10) and written premium in MCR – B4A (column C).	
SCR - B3G – Purpose		
SCR - B3G – Benefits		
SCR - B3G – Costs		
SCR - B3G – Groups		
SCR - B3G – Materiality		

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SCR - B3G - Disclosure		
SCR - B3G - Frequency		
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	The description of this line in the template should refer to " <i>non-life</i> " and not " <i>life</i> ".	
SCR - B3G- cell A11		
SCR - B3G- cell A12		
SCR - B3G- cell A13		
SCR - B3G- cell A14		
SCR - B3G- cell A15		
SCR - B3G- cell A16	The formula in the log file appears to be incorrect. Log file is: $A16=A15+0.25*A12$ Should be: $A16=A12+0.25*A15$	
MCR - B4A & B4B - General		

Comments Template on Draft proposal for Quantitative Reporting Templates		Deadline 20 January 2012 12:00 CET
MCR - B4A & B4B - Purpose		
MCR - B4A & B4B - Benefits		
MCR - B4A & B4B - Costs		
MCR - B4A & B4B - Groups		
MCR - B4A & B4B - Materiality		
MCR - B4A & B4B - Disclosure	EIOPA indicated that quarterly and annual templates should be subject to public disclosure. Would this result in the MCR being calculated 5 times per year? 4 for quarterly reporting purposes and 1 for annual reporting purposes? Should we propose that only quarterly templates are reported and disclosed?	
MCR - B4A & B4B - Frequency		
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		

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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		

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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 - B4A- cell A31		
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		

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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		

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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		
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		

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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		
MCR - B4B- cell A31		
MCR - B4B- cell B32		

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MCR - B4B- cell C32		
MCR - B4B- cell B33		
MCR - B4B- cell C33		
MCR - B4B- cell B34		
MCR - B4B- cell C34		
MCR - B4B- cell B35		
MCR - B4B- cell C35		
MCR - B4B- cell B36		
MCR - B4B- cell C36		
MCR - B4B- cell B37		
MCR - B4B- cell C37		
MCR - B4B- cell B38		
MCR - B4B- cell C38		
MCR - B4B- cell B39		
MCR - B4B- cell C39		
Assets - D1- General	<p>Can clarification be provided as to the application of this QRT to Groups. Are entity assets not required to be reported at Group level ?</p> <p>For unit-linked Assets - we propose that these are provided on a summary or Group basis as the Insurer's solvency is not dependant on the performance of that asset.</p> <p>How do QRTs D1, D5 and D6 reconcile ? D5 and D6 include off-balance sheet items.</p> <p>Does this mean that collateral should not be recognised on the Balance Sheet ? If so this is a potential change and different to treatment under IFRS.</p>	

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	<p>These templates are incredibly complex and will be difficult to complete, particularly in cases when data must be collected from external service providers. Service providers themselves may rely on other sources which creates multiple parties in the 'data chain'. At solo level, it will be required to develop data storage systems to consolidate information from numerous databases. In cases when data is required from external service providers, it can be assumed that the undertaking will be responsible for the cost.</p> <p>We query whether it is required to report loans on policies and cash accounts. Many cash accounts may exist at Group level and therefore it would be difficult to report single entries.</p> <p>Not all definitions are clear. Please provide definitions for 'Acquisition cost', 'structured notes', own shares' and ,RMBS'</p> <p>On the investment fund look through - it may prove very difficult to obtain the info from external managers. We are unsure as to how the look-through is going to reconcile to AS-D1. For example AS-D1 will have a 1 line valuation of the investment fund (unit price x volume) and this would include other fund balance sheet items (current assets / liabilities), but an asset class breakdown in AS-D4 would give the asset valuations on a gross basis i.e. exclude the other items. Should the valuation on AS-D1 simply be apportioned across the asset classes in AS-D4?</p>	
Assets - D1- Purpose		
Assets - D1- Benefits	We believe that reporting Assets to this level of detail goes beyond what would be required to assess the solvency situation of an undertaking.	
Assets - D1- Costs		
Assets - D1- Groups	The corresponding summary document states that "reporting at group level should only concern assets of the holding entity, non-EEA insurance	

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	undertakings and other non-supervised entities within the group. Please clarify whether Group versions of Assets QRTs should only contain Group Assets not included in the Entity QRTs?	
Assets - D1- Materiality		
Assets - D1- Disclosure		
Assets - D1- Frequency	EIOPA indicated that this template should be compiled on a quarterly basis. We would suggest that transitional measures be applied for this template and the extent of quarterly reporting be relaxed during 2014. Collecting the necessary data for completion of this template will be difficult within the 8/5 week timescales as required in the Level 2 measures, particularly upon first time reporting. For some securities (investment funds, participations), the information requested can only be provided or updated once a year.	
Assets - D1 - Quarterly Exemption		
Assets - D1- cell A1		
Assets - D1- cell A2		
Assets - D1- cell A3	Since the risks related to these assets are not borne by the undertaking, we believe that this information may not be valuable for the supervisor.	
Assets - D1- cell A4		
Assets - D1- cell A5		
Assets - D1- cell A6		
Assets - D1- cell A7		
Assets - D1- cell A8	There may be cost implications if it is not possible to get the information on the ultimate parent, from one source, for all securities.	
Assets - D1- cell A9		
Assets - D1- cell A10	There may be cost implications if it is not possible to get the information on the ultimate parent, from one source, for all securities.	

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	<p>This information must be sourced from an external provider and will be difficult to report unless the fund/issuer has provided their ultimate parent company information. This is not always the case.</p> <p>Group structures are frequently subject to change and to update this information will be time consuming.</p>	
Assets - D1- cell A11	Does issuer country refer to the entity identified under the "issuer name" or "issuer group" [the working assumption would be that it refers to the issuer name and not the group]?	
Assets - D1- cell A12	For assets that are out on loan, repro'd or have been pledged as collateral, does the "country" correspond to the counterparty that is holding the asset?	
Assets - D1- cell A13		
Assets - D1- cell A15		
Assets - D1- cell A16		
Assets - D1- cell A17	When external ratings are not available, should the undertaking determine an internal rating or leave this cell blank? This may be the case for tangible assets, mortgages or investment funds.	
Assets - D1- cell A18		
Assets - D1- cell A19		
Assets - D1- cell A20		
Assets - D1- cell A22	Does this refer to the number of assets, the number of investment funds or the nominal value of bonds?	
Assets - D1- cell A23		
Assets - D1- cell A24		
Assets - D1- cell A25	<p>Is this the Total cost of holdings, or per unit cost per holding ?</p> <p>Is this purchase price or transaction cost?</p>	

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Assets - D1- cell A26	A26 minus A30 would give the Balance Sheet value. Why are we reporting the 'dirty' value? The total SII amount is defined as including accrued interest for bonds and other interest bearing securities. This differs from the IFRS valuation where accrued interest would be included as part of prepayments/accrued income in other assets, rather than as part of the investment valuation. As D1 is then supposed to tie back to the SII balance sheet for investment values, this implies that the values in the BS-C1 for A8, A8A, should also include accrued interest. Clarification on this point would be beneficial.	
Assets - D1- cell A28		
Assets - D1- cell A30		
Assets - D1Q- General	Can clarification be provided on which type of undertakings the exemption is expected to apply to?	
Assets - D1Q- Purpose		
Assets - D1Q- Benefits		
Assets - D1Q- Costs		
Assets - D1Q- Groups		
Assets - D1Q- Materiality		
Assets - D1Q- Disclosure		
Assets - D1Q- Frequency		
Assets - D1Q- cell A1 (list)		
Assets - D1Q- cell A2 (list)		
Assets - D1Q- cell A3		

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(list)		
Assets - D1Q- cell A4 (list)		
Assets - D1Q- cell A5 (list)		
Assets - D1Q- cell A6 (list)		
Assets - D1Q- cell A7 (list)		
Assets - D1Q- cell A8 (list)		
Assets - D1Q- cell A9 (list)		
Assets - D1Q- cell A10 (list)		
Assets - D1Q- cell A12 (list)		
Assets - D1Q- cell A13 (list)		
Assets - D1Q- cell A14 (list)		
Assets - D1Q- cell A15 (list)		
Assets - D1Q- cell A16 (list)		
Assets - D1Q- cell A17 (list)		
Assets - D1Q- cell A18 (list)		

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Assets - D1Q- cell A20 (list)		
Assets - D1Q- cell A22 (list)		
Assets - D1Q- cell A24 (list)		
Assets - D1Q- cell A25 (list)		
Assets - D1Q- cell A28 (list)		
Assets - D1Q- cell A30 (list)		
Assets - D1Q- cell A3		
Assets - D1Q- cell A5		
Assets - D1Q- cell A6		
Assets - D1Q- cell A7		
Assets - D1Q- cell A7A		
Assets - D1Q- cell A8		
Assets - D1Q- cell A8A		
Assets - D1Q- cell A8C		
Assets - D1Q- cell A8D		
Assets - D1Q- cell A9A		
Assets - D1Q- cell A9B		
Assets - D1Q- cell A9C		
Assets - D1Q- cell A9D		
Assets - D1Q- cell A9E		
Assets - D1Q- cell A9F		

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Assets - D1Q- cell A10A		
Assets - D1Q- cell A10B		
Assets - D1Q- cell A14		
Assets - D1Q- cell A11		
Assets - D1Q- cell A12		
Assets - D1Q- cell A13		
Assets - D1Q- cell A27		
Assets - D1Q- cell L16		
Assets - D1S- General	<p>The level of information required for this template is not easily obtainable for the majority of undertakings. The following items in particular are not commonly collected and stored:</p> <ul style="list-style-type: none"> • Risk factors • Loss given default • Detachment point • Attachment point <p>In order to report these items, information would need to be collected and stored from custodians and investment managers with potentially significant additional costs incurred in the process</p>	
Assets - D1S- Purpose		
Assets - D1S- Benefits		
Assets - D1S- Costs		
Assets - D1S- Groups		
Assets - D1S- Materiality		
Assets - D1S- Disclosure		

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Assets - D1S- Frequency		
Assets - D1S- cell A1		
Assets - D1S- cell A2	A closed list of structured products is welcomed, these should be accompanied by definitions to ensure the information can be entered accurately into the undertakings IT systems.	
Assets - D1S- cell A3		
Assets - D1S- cell A4		
Assets - D1S- cell A5		
Assets - D1S- cell A6		
Assets - D1S- cell A7		
Assets - D1S- cell A8		
Assets - D1S- cell A9		
Assets - D1S- cell A10		
Assets - D1S- cell A12		
Assets - D1S- cell A13		
Assets - D1S- cell A14		
Assets - D1S- cell A15		
Assets – D2O- General	<p>Reporting on a trade-by trade basis will involve a huge amount of data – thousands of records. Unsure as to what this level of detail is adding. We are already providing the capital position at the year end. Existing database design would have to be enhanced to accommodate this level of data.</p> <p>The detail required for both historic and open derivative contracts is onerous and may prove very costly, adding little value to the business. The second line of defence should be in a position to monitor very risky positions on investment asset holdings and therefore capturing closed trade out data day by day is of little use to a business. The recording of this type of transactional</p>	

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	<p>data does not really fit with the rest of the templates that are single point in time snapshots.</p> <p>This template includes all derivatives contracts that existed during the reporting period, independent of having being closed prior to the reporting period. The database implications are large for this requirement. Depending on the time period over which the contracts should be reported, reporting would be an enormous task with little added value as the contracts are in fact closed. The reporting should be limited to assets held at the date of reporting.</p> <p>These templates would demand a huge work on consolidating different databases. A generous adaptation period would be welcomed.</p>	
Assets – D20- Purpose		
Assets – D20- Benefits		
Assets – D20- Costs		
Assets – D20- Groups		
Assets – D20- Materiality	We believe that this template should only be reported if the total notional amount (A15) exceeds a certain percentage of total investments.	
Assets – D20- Disclosure		
Assets – D20- Frequency		
Assets – D20 – Quarterly Exemption		
Assets - D20- cell A1		
Assets - D20- cell A2		
Assets - D20- cell A3		

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Assets - D20- cell A4		
Assets - D20- cell A5		
Assets - D20- cell A6		
Assets - D20- cell A7		
Assets - D20- cell A8		
Assets - D20- cell A9		
Assets - D20- cell A10	There is no explanation provided for derivatives with more than one currency for example, FX forwards, FX options, cross currency swaps.	
Assets - D20- cell A11		
Assets - D20- cell A13		
Assets - D20- cell A14		
Assets - D20- cell A15		
Assets - D20- cell A16		
Assets - D20- cell A17		
Assets - D20- cell A19		
Assets - D20- cell A20		
Assets - D20- cell A21		
Assets - D20- cell A22		
Assets - D20- cell A23		
Assets - D20- cell A24		
Assets - D20- cell A25		
Assets - D20- cell A26		
Assets - D20- cell A27		
Assets - D20- cell A28		
Assets - D20- cell A29		
Assets - D20- cell A31		

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Assets - D20- cell A32		
Assets - D20- cell A33		
Assets - D20- cell A34		
Assets - D20- cell A35		
Assets - D2T- General	<p>As D20 General. Reporting closed positions doesn't give any indication of future exposure. Cannot see any benefit in reporting closed positions.</p> <p>The detail required for both historic and open derivative contracts is onerous and may prove very costly, adding little value to the business. The recording of this type of transactional data does not really fit with the rest of the templates that are single point in time snapshots.</p> <p>To meet the purpose we only see a need for active derivative positions to be able to have an understanding about the risk in the portfolio.</p> <p>Transactional detail doesn't add any value if the receiver doesn't have a portfolio system where this could be monitored (i.e. supervisor).</p>	
Assets - D2T- Purpose		
Assets - D2T- Benefits		
Assets - D2T- Costs		
Assets - D2T- Groups		
Assets - D2T- Materiality		
Assets - D2T- Disclosure		
Assets - D2T- Frequency		

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Assets – D2T- Quarterly Exemption		
Assets - D2T- cell A1		
Assets - D2T- cell A2		
Assets - D2T- cell A3		
Assets - D2T- cell A4		
Assets - D2T- cell A5		
Assets - D2T- cell A6		
Assets - D2T- cell A7		
Assets - D2T- cell A8		
Assets - D2T- cell A9		
Assets - D2T- cell A10		
Assets - D2T- cell A11		
Assets - D2T- cell A13		
Assets - D2T- cell A14		
Assets - D2T- cell A15		
Assets - D2T- cell A16		
Assets - D2T- cell A17		
Assets - D2T- cell A18		
Assets - D2T- cell A19		
Assets - D2T- cell A20		
Assets - D2T- cell A21		
Assets - D2T- cell A22		
Assets - D2T- cell A23		
Assets - D2T- cell A24		

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Assets - D2T- cell A25		
Assets - D2T- cell A26		
Assets - D2T- cell A27		
Assets - D2T- cell A28		
Assets - D2T- cell A30		
Assets - D2T- cell A31		
Assets - D2T- cell A32		
Assets - D2T- cell A34		
Assets - D2T- cell A35		
Assets - D3- General		
Assets - D3- Purpose		
Assets - D3- Benefits		
Assets - D3- Costs		
Assets - D3- Groups		
Assets - D3- Materiality		
Assets - D3- Disclosure		
Assets - D3- Frequency		
Assets - D3- cell A1		
Assets - D3- cell A3		
Assets - D3- cell A4		
Assets - D3- cell A6	Investment performance for the year can only be properly evaluated by assessing all cash flows and accruals. It is our understanding that accruals are not included here.	

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	<p>It would be helpful to clarify the purpose of reporting this information. Is it supposed to align with the P&L account? Definition not in line with IFRS.</p> <p>The term « paid » was replaced by the term « received ». It is not clear if that is more an editorial change or that it means that instead of a cash flow view (as it is suggested by the term « paid ») now another view (e.g. a periodical view like in IFRS profit and loss accounting) shall be practised. The final LOG should be clearer in this point.</p>	
Assets - D3- cell A7		
Assets - D3- cell A8	To assess the profitability of an investment it would be better to use the accrued interests and rents instead of using the cash basis approach (interests and rents received).	
Assets - D3- cell A15	It will be difficult to report only realized gains/losses and exclude the unrealized result. It would be easier for us to report a total result , which was required in the previous template.	
Assets – D4- General	<p>The requirement to report information on funds on a look through basis is extremely difficult and costly for companies. There may be legal restrictions preventing a full look-through. In certain cases, it may not be possible to implement as it is by no means certain that the fund management industry will agree to provide such information.</p> <p>Moreover, this template should not be applicable to assets backing unit linked products. This will represent a very significant additional burden. Indeed, this information for UL is not needed for Pillar 1 calculation as investment risks are borne by the policyholder. Thus, requiring this information only for reporting purposes appears excessive.</p>	

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	<p>There's a shared sense of necessity about a materiality threshold in this template. Work in order to clarify the underlying asset composition of a fund holding a very small portion of insurer investments are considered not worth the effort.</p> <p>Some of the information has to be called from third parties (fund managers): serious concerns raised on the possibility of being able to comply with expected reporting calendars, in practice out of date information may be supplied).</p> <p>If prescribed look-through level is in place, the template could be disclosing business sensitive information. We propose that the template is not disclosed, but anyway the question of core information about business strategy being revealed in a systematic way remains open.</p> <p>To receive information from Investment Funds will be a challenge, especially on a quarterly basis. There will be a lot of manual work involved with large risk of human errors. Timing issue will also be challenging especially for quarterly reporting.</p> <p>Furthermore, will the information received be sufficient? What about funds that has underlying exposure to other currencies? This will most likely not be captured within present structure.</p>	
Assets – D4- Purpose		
Assets – D4- Benefits		
Assets – D4- Costs	The look-through approach demanded will result in significant additional costs, mainly due to external providers' charges for providing such information.	
Assets – D4- Groups		
Assets – D4- Materiality	We propose a materiality threshold for the portfolio list, e.g. 1%, i.e. that all	

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	assets which account for less than 1% of total assets should not be reported asset-by-asset.	
Assets – D4- Disclosure		
Assets – D4- Frequency	<p>Many funds of funds and collective investment schemes provide information on their underlying investments annually and with a significant lag after the period end. This means it will be difficult to provide timely, accurate and reliable information in this template. Also, the data must be sourced from investment providers; if they report only on bi-annual/quarterly basis then the undertaking would have to incur additional costs.</p> <p>Given the amount of extra work that will be generated by this template, we propose to report this level of detail on an ad-hoc basis only.</p>	
Assets – D4 – Quarterly Exemption		
Assets - D4- cell A1		
Assets - D4- cell A2		
Assets - D4- cell A3		
Assets - D4- cell A4		
Assets - D4- cell A5		
Assets - D4- cell A6		
Assets - D4- cell A7		
Assets - D4- cell A8		
Assets – D5- General	Stock lending activities are fully indemnified – due to this, the data being requested here is considered excessive.	
Assets – D5- Purpose		
Assets – D5- Benefits		

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Assets – D5- Costs		
Assets – D5- Groups		
Assets – D5- Materiality		
Assets – D5- Disclosure		
Assets – D5- Frequency		
Assets - D5- cell A1		
Assets - D5- cell A2		
Assets - D5- cell A3		
Assets - D5- cell A4		
Assets - D5- cell A5		
Assets - D5- cell A6		
Assets - D5- cell A7	What is the definition of Counterparty ? Is it the agent , or is it the underlying Counterparty. We may not see the underlying Counterparty.	
Assets - D5- cell A8	What is the definition of the most significant ? Risk exposure or value ? There is a separate template for reporting collateral – Is this required here.	
Assets - D5- cell A9	ISLA (the securities lending trade association) have confirmed that "Near leg & far leg are concepts that do not apply to securities lending". Can these elements be removed?	
Assets - D5- cell A10	As A9	
Assets - D5- cell A11		
Assets - D5- cell A12		
Assets - D5- cell A13		
Assets - D5- cell A14	Is this an income measure or a fair value measure ? Is this gross or net of expenses ?	
Assets – D6- General	For general comments, please refer to cell Assets – D1 – General.	

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	<p>The proposed requirements are too onerous for assets held as a collateral where all financial risks are borne by the lender (reinsurer for instance).</p> <p>The relevant information in this template is on the value of the collateral, and its nature (for instance to ensure that it is not the reinsurers own shares held as a collateral). We do not believe that the use of cash as collateral is not properly addressed in this template.</p> <p>For these reasons, we propose to keep only the following cells:</p> <ul style="list-style-type: none"> • A2 to A5 • A12 (but only the first category of the CIC, i.e. the third position) • A19 and A20 • A26 to A28 	
Assets – D6- Purpose		
Assets – D6- Benefits		
Assets – D6- Costs		
Assets – D6- Groups		
Assets – D6- Materiality		
Assets – D6- Disclosure		
Assets – D6- Frequency		
Assets - D6- cell A2		
Assets - D6- cell A3		
Assets - D6- cell A4		
Assets - D6- cell A5		

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Assets - D6- cell A6		
Assets - D6- cell A7		
Assets - D6- cell A8		
Assets - D6- cell A9		
Assets - D6- cell A10		
Assets - D6- cell A12		
Assets - D6- cell A19		
Assets - D6- cell A20		
Assets - D6- cell A21		
Assets - D6- cell A22		
Assets - D6- cell A24		
Assets - D6- cell A25		
Assets - D6- cell A26		
Assets - D6- cell A27		
Assets - D6- cell A28		
TP - F1 & F1Q- General		
TP - F1 & F1Q - Purpose		
TP - F1 & F1Q - Benefits		
TP - F1 & F1Q - Costs		
TP - F1 & F1Q - Groups		
TP - F1 & F1Q - Materiality	The proposals to report risk margin per LOB are overly onerous. We propose to report these items at an entity level only. This is justified by the fact that risk margin is calculated at entity level and not by LOB. We acknowledge that the current L2 Measures could be interpreted that technical provisions should be calculated by LOB. However, we should keep in mind that if the risk margin	

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	should be allocated by LOB it will be using proxies (e.g. during the QIS 5 exercise undertakings allocated their risk margin proportionally to the Best Estimate – update from Level 2 text?). To avoid reporting approximated and potentially misleading information, we strongly suggest merging all the cells regarding the risk margin.	
TP - F1 & F1Q - Disclosure		
TP - F1 & F1Q - Frequency		
TP - F1- cells A1 – A14	'Index-linked and unit-linked insurance' – Can further clarification be provided as to the definition of this field. Does this mean all index-linked, or index-linked within unit-linked funds?	
TP - F1- cell A7A		
TP - F1- cell A7B		
TP - F1- cell A7C		
	'Contracts with options and guarantees' – Can further clarification be provided as to the definition of this field. A lot of effort would be required in the development and ongoing maintenance of such reporting requirements. It should be sufficient to report the gross best estimate total instead of per "cash in-flow" and "cash out-flow" for businesses modelled using simplifications. The reserving methods are audited, and covered through the governance and internal control procedures, and in the ORSA, which should be sufficient.	
TP - F1- cells B1 – B14	Clarification on "other cash flows" is necessary.	
TP - F1- cells B2 – C2		
TP - F1- cells B4-C1		
TP - F1- cells BA1 – BA13		

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TP - F1- cell BB1		
TP - F1- cell BB10		
TP - F1- cell BB13		
TP - F1- cells BC1 – BC13		
TP - F1- cells BD1 – BD13		
TP - F1- cells BF1 – BF13		
TP - F1- cells CB1 – CB14A		
TP - F1- cells CC1 – CC14		
TP - F1- cells CD1 – CD14A		
TP - F1- cells C1 – C14A		
TP - F1- cells CB9A – C9A		
TP - F1- cells E1 – E13		
TP - F1- cells FB7A	Are these cells applicable if you are not providing 'Technical Provisions as a whole' values?	
TP - F1- cells FB7B	Are these cells applicable if you are not providing 'Technical Provisions as a whole' values?	
TP - F1- cells FB7C	Are these cells applicable if you are not providing 'Technical Provisions as a whole' values?	
TP - F1- cells IA1 – IA 13	'Technical Provisions of contracts with a surrender option' - Does this definition mean any surrender option, or only policies with a guaranteed surrender option?	
TP - F1- cells J1 – JL13		

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TP - F1- cells M1-M13	The definition of allowable "simplified methods" is still under development in the context of Level 2 – note that there should be no pre-defined set of simplified methods. An undertaking should be able to use any method, as long as it has been approved by the supervisor.	
TP - F1- cells N1-N13		
TP - F1- cells O1-O13		
TP - F1- cells P1-P13	The field "Technical Provisions of Products with a Surrender Option" in the TP-F1 QRT for Accepted Reinsurance business is greyed out as a surrender value is not relevant for this line of business. However, the field "Total Amount of Surrenders" for the same line of business is not greyed out implying a value is required. Please clarify whether both fields should be greyed-out as not required?	
TP - F1- cells Q1-Q13		
TP - F1Q- cells A1-A13		
TP - F1Q- cell A7A		
TP - F1Q- cell A7B		
TP - F1Q- cell A7C		
TP - F1Q- cells B1-B13		
TP - F1Q- cells C1-C14A		
TP - F1Q- cell C11		
TP - F1Q- cell C12		
TP - F1Q- cell C13		
TP - F1Q- cell C14A		
TP - F1Q- cell E1-E13		
TP – F2- General	It should be clarified whether the cash flows are gross or net of reinsurance and also on the methodology anticipated for example, deterministic scenario, mean of the stochastic scenario etc.	

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TP – F2- Purpose		
TP – F2- Benefits		
TP – F2- Costs		
TP – F2- Groups		
TP – F2- Materiality		
TP – F2- Disclosure	We support EIOPA’s decision not to disclose information on cash flows. This is commercially sensitive information.	
TP – F2- Frequency		
TP – F2- cells A1-A34		
TP – F2- cells C1 – C35		
TP -F2- cells D1-D35		
TP -F2- cells F1-F35		
TP -F2- cells AU1 –AU35		
TP -F2- cells CU1 – CU35		
TP -F2- cells DU1 – DU35		
TP -F2- cells FU1 – FU35		
TP -F2- cells I1 –I35		
TP -F2- cells J1 –J35		
TP -F2- cells K1 –K35		
TP -F2- cells L1 –L35		
TP -F2- cells M1 –M35		
TP -F2- cells N1 –N35		

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TP -F2- cells O1 –O35		
TP -F2- cells P1-P35		
TP -F2- cells Q1 –Q35		
TP -F2- cells R1 –R35		
TP -F2- cells S1 –S35		
TP -F2- cells T1 –T35		
TP -F2- cells U1 – U35		
TP -F2- cells CH1 –CH35		
TP -F2- cells DH1 –DH35		
TP -F2- cells FH1 –FH35		
TP -F2- cells V1 –V35		
TP -F2- cells X1 – X35		
TP -F2- cells Y1-Y35		
TP -F2- cells Z1- Z35		
TP -F2- cells GH1 –GH35		
TP – F3- General	<p>The template requires data to be synchronised between “technical provisions” (actuarial) and “claims paid and premiums received” (accounting). The required data is currently not held nor matched at the product denomination level of granularity and it will be highly onerous to provide this information. The definition of “product denomination” will result in a huge number of rows in this table.</p> <p>Systematic reporting should only be required for annualised guaranteed rate and the “Identification and classification” section (green) for supervisory purposes. For ad-hoc reporting only some columns should be required as set out below. Other areas should be reported on a qualitative basis (table, surrender rates, financial replication).</p>	

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The summary document gives the impression that HRG's are regrouping products yet the excel template appears to indicate that it is more detailed than products. We would urge EIOPA not to follow a level of granularity that is not aligned to the way that undertakings manage their risks.

If we correctly understand, a single product will have different lines when it has different characteristics according to following fields (guarantees with different risks, different commercialisation dates, etc). It should be noted that the same product could be part of several HRGs. For example, products with different guaranteed rates during the life of a single contract, we assume that we can regroup contracts and calculate an average guaranteed rate.

Furthermore, we assume that it is possible to mention 2 tables used to calculate the BE, one for men and one for women, avoiding to split the product in 2 only because of gender.

We believe this is an excessive level of detail about technical provisions. For assessing how model points are built, this information should not be requested systematically but either on an ad hoc basis or in coordination with an on-site inspection. For analysing the products sold. A simpler template could be developed consisting only of cells A1 – A8, A24 – A30 and potentially A15.

We don't see EIOPA's need for information on commercial names of products. This information is in many cases arbitrary, as a commercial name can cover several products, and hence is not related to the risk. The reporting by line of business should be sufficient.

This template contains too much information to be collected and reported annually.

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TP – F3- Purpose		
TP – F3- Benefits		
TP – F3- Costs	<p>Overall, the granularity in this template is significant and therefore will be very time consuming and expensive to create.</p> <p>Cells A9 to A15 in particular will be very costly to report and the information may not be available for example, the number of insured persons for group contracts.</p> <p>Best estimate information (A21) should not be required at HRG level. Undertakings would complete these calculations at entity level or fund level.</p>	
TP – F3- Groups		
TP – F3- Materiality		
TP – F3- Disclosure		
TP – F3- Frequency		
	<p>Can some clarification be provided as to the level of information being requested here. Can products be grouped for reporting purposes?</p> <p>More guidance is required on “product denomination” and how granular the proposal will be in practice. The more granular the denomination is the more demanding it will be to complete the template.</p> <p>Although some information is available on a product basis, in the vast majority of cases, a split by product for the information requested will be very difficult to achieve.</p>	
TP - F3- cell A1	Difficulties may arise when using “commercial name” as this can often be	

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	subject to change.	
TP - F3- cell A2A		
TP - F3- cell A2B		
TP - F3- cell A2C		
TP - F3- cell A3		
TP - F3- cell A4		
TP - F3- cell A5	The "type of product" list should not be more extensive than the product categories set out on page TP-F1.	
TP - F3- cell A6	The harmonized code still contains a position (2nd letter) to identify the risk driver of a product, whereas in TP-F1 the segmentation into risk driver has been removed.	
TP - F3- cell A7		
TP - F3- cell A8		
TP - F3- cell A9	<p>Certain insurance products are not insurance contracts under IFRS4, they may be classed as Investment contracts. Can the definition / scope of contracts be clarified here.</p> <p>It is unclear how "number of insured persons" should be interpreted in cases where an individual is insured under more than one policy, this would pose significant logistical difficulties in order to identify and group all the policies of an individual.</p> <p>We do not understand why the reference for contracts is IFRS 4. In Solvency II framework there's no distinction between insurance and investment contracts.</p> <p>Template F3 in the LOG for the cells A9, A10 and A15, only contracts that in the accounting (IFRS) are classified as insurance contracts are mentioned.</p>	

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	<p>What should be done with contracts classified as investment contracts (e.g. unit link), are investment contracts to be included or not in the template?</p> <p>Does this cell only refer to insurance contracts defined in IFRS and disregards contracts defined as investment contract?</p>	
TP - F3- cell A10		
TP - F3- cell A15		
TP - F3- cell A21	<p>Many undertakings indicated they would find it difficult to report BE calculations at HRG level. For instance, value of options and guarantees are calculated at a macro level (usually entity level) and an artificial allocation of this value to HRG would not make sense. If the idea is to understand the volume of the product, then other information, such as surrender value or capital at risk, should be used.</p> <p>BE information should be presented at entity level or at the most granular, fund level.</p>	
TP - F3- cell A24	Can some further clarification be provided as to the definition of 'Insured Capital' ? – As per the log document.	
TP - F3- cell A26	Calculation of total surrender value for all in-force business would be very time-consuming. BE liabilities seem to already capture the value of these options and clarification would be helpful on why they are required to be reported separately.	
TP - F3- cell A30	<p>This value would appear to make sense at policy level for Non profit endowments and single premium policies. Aggregating this to a group of policies would be difficult and not clear there is any purpose in this value. Can this item therefore be removed.</p> <p>Is this value required for Non-commercialised products ?</p>	

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	Can the statement 'Not applicable for unit linked and profit business.' be clarified. Is this just with profit business?	
TP - F3- cell A34A		
TP - F3- cell A41	Is this cell applicable where we are not calculating 'Technical Provisions as a whole' ? Field header refers to table, but BE table from previous version is removed. The amount of claims that is presented here cannot be related to this table, nor be compared to the actual amount of claims for this field (A20) is also removed.	
TP – F3A- General		
TP – F3A- Purpose		
TP – F3A- Benefits		
TP – F3A- Costs		
TP – F3A- Groups		
TP – F3A- Materiality		
TP – F3A- Disclosure		
TP – F3A- Frequency		
TP - F3A- cell A1		
TP - F3A- cell A2		
TP - F3A- cell A3		
TP - F3A- cell A4		
TP - F3A- cell A5		
TP - F3A- cell A6		

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TP - F3A- cell A7		
TP - F3A- cell A8		
TP - F3A- cell A9		
TP - F3A- cell A10		
TP - F3A- cell A11		
TP - F3A- cell A12		
TP - F3A- cell A13		
TP - F3A- cell A14		
TP - F3A- cell A15		
TP - F3A- cell A16		
TP - F3B- cell A1		
TP - F3B- cell A2		
TP - F3B- cell A3		
TP - F3B- cell A4		
TP - F3B- cell A5		
TP - F3B- cell A6		
TP - F3B- cell A7		
TP - F3B- cell A8		
TP - F3B- cell A9		
TP - F3B- cell A10		
TP - F4- General		
TP - F4- Purpose		
TP - F4- Benefits		
TP - F4- Costs		

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TP – F4- Groups		
TP – F4- Materiality		
TP – F4- Disclosure		
TP – F4- Frequency		
TP - F4- cell A0		
TP - F4- cell A1		
TP - F4- cell A2		
TP - F4- cell A3		
TP - F4- cell A4		
TP - F4- cell A5		
TP - F4- cell B1		
TP - F4- cell C1		
TP - F4- cell D1		
TP - F4- cell A6		
TP – E1 & E1Q- General		
TP – E1 & E1Q - Purpose		
TP – E1 & E1Q - Benefits		
TP – E1 & E1Q - Costs		
TP – E1 & E1Q - Groups		
TP – E1 & E1Q - Materiality		
TP – E1 & E1Q - Disclosure		

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TP - E1 & E1Q - Frequency		
TP - E1- cells A1-P1		
TP -E1- cellss A2-L2		
TP -E1- cellss A3-L3		
TP -E1- cellss M4-P4		
TP -E1- cellss A5-P5		
TP -E1- cellss A6-L6		
TP -E1- cellss M7-P7		
TP -E1- cellss A9-P9		
TP -E1- cells A10-P10		
TP -E1- cells A11-P11		
TP -E1- cells A12-P12		
TP -E1- cells A14-L14		
TP -E1- cells A15-L15		
TP -E1- cells M16-P16		
TP -E1- cells A18-P18		
TP -E1- cells A19-P19		
TP -E1- cells A20-P20		
TP -E1- cells A21-P21		
TP -E1- cells A25-P25		
TP -E1- cells A29-P29		
TP -E1- cells A30-P30		
TP -E1- cells A31-P31		
TP -E1- cells A32-P32		

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TP -E1- cells A33-P33		
TP -E1- cells A34-P34		
TP -E1- cells A35-P35		
TP -E1- cells A36-P36		
TP -E1- cellss A37-P37		
TP -E1- cellss A38-P38		
TP -E1- cellss A39-P39		
TP -E1- cellss A40-P40		
TP -E1- cellss A41-L53		
TP - E1 Q- cells A1-R1		
TP - E1 Q- cells A2-R2		
TP - E1 Q- cells A3-R3		
TP - E1 Q- cells A5-R5		
TP - E1 Q- cells A6-R6		
TP - E1 Q- cells A10-R10		
TP – E2- General		
TP – E2- Purpose		
TP – E2- Benefits		
TP – E2- Costs		
TP – E2- Groups		
TP – E2- Materiality		
TP – E2- Disclosure		
TP – E2- Frequency		

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TP - E2- cells A1-A31		
TP - E2- cells B1-B31		
TP - E2- cells C1-C31		
TP - E2- cells D1-D31		
TP - E2- cells E1-E31		
TP - E2- cells F1-F31		
TP - E3- General		
TP - E3- Purpose		
TP - E3- Benefits		
TP - E3- Costs		
TP - E3- Groups		
TP - E3- Materiality		
TP - E3- Disclosure		
TP - E3- Frequency		
TP - E3- cells A00		
TP - E3- cells A01		
TP - E3- cells A02		
TP - E3- cells A03: N		
TP - E3- cells A04		
TP - E3- cells A1-A15-J0		
TP - E3- cells A17-A31- J16		
TP - E3- cells A33-A47- J32		

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TP - E3- cells P1-P15-J0		
TP - E3- cells P33-P47-J32		
TP - E3- cells AE1-AE15-J0		
TP - E3- cells AE17-AE31-J0		
TP - E3- cells AE33-AE47-J0		
TP - E3- cells IH1-IE15B		
TP - E4- General		
TP - E4- Purpose		
TP - E4- Benefits		
TP - E4- Costs		
TP - E4- Groups		
TP - E4- Materiality		
TP - E4- Disclosure		
TP - E4- Frequency		
TP - E4- cells A1-A10		
TP - E4- cells B1-B10		
TP - E4- cells C1-C10		
TP - E4- cells D1-D10		
TP - E4- cells E1-E10		
TP - E4- cells F1-F10		

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TP - E4- cells G1-G10		
TP - E4- cells H1-H10		
TP - E4- cells I1-I10		
TP - E4- cells J1-J10		
TP - E4- cells K1-K10		
TP - E4- cells L1-L10		
TP - E4- cells M1-M11		
TP - E4- cells N1-N11		
TP - E4- cells O1-O11		
TP - E4- cells P1-P10		
TP - E4- cells Q1-Q10		
TP - E4- cells R1-R10		
TP - E4- cells S1-S10		
TP - E4- cells T1-T10		
TP – E6- General		
TP – E6- Purpose		
TP – E6- Benefits		
TP – E6- Costs		
TP – E6- Groups		
TP – E6- Materiality		
TP – E6- Disclosure		
TP – E6- Frequency		
TP – E6- cells A1-A20		

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TP – E6- cells B1-B20		
TP – E6- cells C1-C20		
TP – E6- cells D1-D20		
TP – E6- cells E1-E20		
TP – E6- cells F1-F20		
TP – E6- cells G1-G20		
TP – E6- cells H1-H20		
TP – E6- cells I1-I20		
TP – E6- cells J1-J20		
TP – E6- cells K1-K20		
TP – E6- cells L1-L20		
TP – E6- cells AE1-AE20		
TP – E6- cells AF1-AF20		
TP – E7A- General		
TP – E7A- Purpose		
TP – E7A- Benefits		
TP – E7A- Costs		
TP – E7A- Groups		
TP – E7A- Materiality		
TP – E7A- Disclosure		
TP – E7A- Frequency		
TP – E7A- cell A1		
TP – E7A- cell B1		

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TP – E7A- cell C1		
TP – E7A- cell D1		
TP – E7A- cell E1		
TP – E7A- cell F1		
TP – E7A- cell G1		
TP – E7A- cell H1		
TP – E7A- cell I1		
TP – E7A- cell J1		
TP – E7A- cell K1		
TP – E7A- cell L1		
TP – E7A- cell M1		
TP – E7B- General		
TP – E7B- Purpose		
TP – E7B- Benefits		
TP – E7B- Costs		
TP – E7B- Groups		
TP – E7B- Materiality		
TP – E7B- Disclosure		
TP – E7B- Frequency		
TP – E7B- cell A01		
TP – E7B- cell A1		
TP – E7B- cell B1		

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TP – E7B- cell C1		
TP – E7B- cell D1		
TP – E7B- cell E1		
Re - J1- General	<p>At what level is the template required to be reported? Is a risk considered to be an individual person or an individual risk? Is the template asking for the top 10 policies or the top 10 risks? The majority of Information requested is not currently produced at either level and would be time-consuming and expensive to produce.</p> <p>A significant amount of work would be required to identify the ten policies with biggest net share of risk capital across each LOB and, as some LOBs may be relatively small, it may not be proportionate to require 'top 10' by LOB. Reporting of the 10 biggest risks across all LOBS was suggested as an alternative or to specify a materiality threshold at business level.</p> <p>Systems and reporting tools would need to be developed to enable lean and high quality reporting of this template. The information requested in this template is often not held directly by undertakings.</p> <p>It is not clear in the revised templates how to report reinsurance shared between reinsurers. Further guidance is required on whether separate lines should now be included for each reinsurer making up a single reinsurance item.</p> <p>Risk capital (Life) is defined as insured capital less provision for insurance liabilities; it is not clear whether the insurance liabilities are based on Best Estimates or Best Estimates + Risk Margin or some other definition. Clarification would be helpful.</p>	

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	<p>A definition of 'facultative business' would be useful to better determine what is expected.</p> <p>It needs to be made clear whether claims and reinsurance figures for all templates are on either i) a booked basis within the systems or ii) a best estimate or iii) best estimate plus risk margin.</p> <p>An example of how an entity determines what data goes where would be helpful.</p> <p>Formulas in P11, Q11, R11, S11 T11 & V11 should refer to O11 not O1</p>	
Re - J1- Purpose	We question to what extent the template will address its stated purpose i.e. providing insight into the risk profile of the undertaking on basis that risk is managed and mitigated in a more holistic way, looking at extracts of data in isolation may not adequately reflect this. The adequacy of reinsurance could be better addressed through an undertaking's ORSA and other Pillar II processes.	
Re - J1- Benefits		
Re - J1- Costs		
Re - J1- Groups		
Re - J1- Materiality		
Re - J1- Disclosure		
Re - J1- Frequency		
Re - J1- cell A00	Is 'Line of Business' that defined in the TP-F1 template (closed list)?	
Re - J1- cell A1		

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Re - J1- cell B1		
Re - J1- cell C1		
Re - J1- cell D1		
Re - J1- cell E1		
Re - J1- cell F1		
Re - J1- cell G1		
Re - J1- cell H1		
Re - J1- cell I1		
Re - J1- cell J1		
Re - J1- cell K1		
Re - J1- cell L1		
Re - J1- cell M1		
Re - J1- cell N1		
Re - J1- cell P1		
Re - J1- cell Q1		
Re - J1- cell W1		
Re - J1- cell Y1		
Re - J1- cell Z1		
Re - J1- cell AB1		
Re - J1- cell AC1		
Re - J1- cell A01		
Re - J1- cell A11	Is this field now redundant? As template is not required at Group level?	
Re - J1- cell B11		
Re - J1- cell C11		
Re - J1- cell D11		

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Re - J1- cell E11		
Re - J1- cell F11		
Re - J1- cell G11		
Re - J1- cell H11	A policy could have more than one risk type, Does that mean that we would split the policy across multiple lines in the QRT.	
Re - J1- cell I11		
Re - J1- cell J11		
Re - J1- cell K11		
Re - J1- cell L11		
Re - J1- cell M11	Risk capital is defined as insured capital less provision for insurance liabilities; it is not clear whether the insurance liabilities are based on Best Estimates or Best Estimates + Risk Margin or some other definition. Clarification would be helpful. Calculations will be completed at a higher (i.e Fund) level. Will approximations be allowed?	
Re - J1- cell O11		
Re - J1- cell U11		
Re - J1- cell W11		
Re - J1- cell X11		
Re - J1- cell Z11		
Re - J1- cell AA11	Can you please confirm whether this is commission due to the Reinsurer?	
Re - J2- General	Reinsurance solutions for the "next reporting year" are generally not finalised until very late and thus information about the next year neither exists or is registered until very late in the year or early in the next year. For example, 2015 treaties cannot be reported fully in 2014. Accurate data is not available and only estimates would be available.	

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	<p>Reporting of all reinsurance transactions is extensive. The reinsurance programme will be described in the RSR, and hence this seems like a duplication of effort.</p> <p>Should the "Treaty" or "Program" be reported? The title indicates that programs should be reported whereas in the individual cells, only the treaty is mentioned. We would prefer to report programs. Please clarify the level or reporting.</p> <p>It remains unclear whether information per year, risk or exposure is required. Moreover, more guidance and clear definitions are necessary in order to adequately fill the template.</p> <p>Report contains information that is not available in reinsurance systems and has to be manually added. As this is an extensive report it should contain information that is readily available in systems. Are risks/policies that are reinsured to captives or fronted to other insurance companies considered as program or facultative placements?</p>	
Re - J2- Purpose		
Re - J2- Benefits		
Re - J2- Costs	<p>Significant additional costs will be incurred as a result of this template and the additional data required. For example: progressive sections; progressive number and quantity of surplus/layers in program; EIOPA codes and names of Reinsured, Reinsurer and Broker; Type of treaty; Catastrophic guarantees specifications.</p> <p>It will be required to manually input information into this template. This will have a cost impact.</p>	

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	There will be a lot of added costs if all needed data has to be added to reinsurance system (e.g. progressive sections, progressive number and quantity of surplus/layers in program, EIOPA codes and names of Reinsured, Reinsurer and Broker, Type of treaty, Catastrophic guarantees specifications).	
Re - J2- Groups	Is this QRT applicable to Groups? Summary document indicates not. Cell A1 indicates that it is.	
Re - J2- Materiality		
Re - J2- Disclosure		
Re - J2- Frequency	Can you please confirm whether there will be any requirement to report this QRT quarterly in the first year of SII implementation, or will the QRT only be required (assuming any new or cancelled treaties and in the case of material changes in the reinsurance program) quarterly following the first annual submission of RE - J2?	
Re - J2- cell A1		
Re - J2- cell B1		
Re - J2- cell C1		
Re - J2- cell D1		
Re - J2- cell E1		
Re - J2- cell F1		
Re - J2- cell G1		
Re - J2- cell H1		
Re - J2- cell I1		
Re - J2- cell J1		
Re - J2- cell K1		
Re - J2- cell L1		
Re - J2- cell M1		

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Re - J2- cell N1		
Re - J2- cell O1		
Re - J2- cell P1		
Re - J2- cell Q1	'Gross estimated treaty premium income' – Is this the premium paid to the reinsurer?	
Re - J2- cell R1		
Re - J2- cell S1		
Re - J2- cell T1		
Re - J2- cell U1		
Re - J2- cell V1	We believe that further guidelines should be developed for this template to include examples for different reinsurance programs in order to prevent misunderstandings. For example, how (per line of business) a reinsurance program would be reported, which contains quota share reinsurance, excess liability reinsurance and Life XL-reinsurance.	
Re - J2- cell W1		
Re - J2- cell X1		
Re - J2- cell Y1		
Re - J2- cell Z1	Can further clarification be provided as to the definition here?	
Re - J2- cell AA1		
Re - J2- cell AB1		
Re - J2- cell AC1		
Re - J2- cell AD1		
Re - J2- cell AE1		
Re - J2- cell AF1		
Re - J2- cell AG1		
Re - J2- cell AM1		

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Re - J2- cell AO1		
Re - J2- cell AP1		
Re - J2- cell AQ1	What is the difference between Q1 and AQ1?	
Re - J3- General	Is the information to be reported here gross or net of Internal Reinsurance?	
Re - J3- Purpose		
Re - J3- Benefits		
Re - J3- Costs		
Re - J3- Groups		
Re - J3- Materiality		
Re - J3- Disclosure		
Re - J3- Frequency		
Re - J3- cell A1		
Re - J3- cell B1		
Re - J3- cell C1		
Re - J3- cell D1		
Re - J3- cell E1		
Re - J3- cell F1		
Re - J3- cell G1		
Re - J3- cell H1		
Re - J3- cell I1		
Re - J3- cell J1		
Re - J3- cell L1	Best estimate adjustments are calculated actuarially at the population level. Is there an expected treatment to apply/subdivide this adjustment to individual reinsurers as we feel this will be spurious accuracy given the uncertainty	

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	surrounding the gross claims best estimates values?	
Re - J3- cell M1		
Re - J3- cell O1		
Re - J3- cell P1		
Re - J3- cell Q1		
Re - J3- cell R1		
SPV - General		
SPV - Purpose		
SPV - Benefits		
SPV - Costs		
SPV - Groups		
SPV - Materiality		
SPV - Disclosure		
SPV - Frequency		
SPV- cell A1		
SPV- cell B1		
SPV- cell B1A		
SPV- cell C1		
SPV- cell D1		
SPV- cell E1		
SPV- cell F1		
SPV- cell F1A		
SPV- cell G1		

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SPV- cell H1		
SPV- cell I1		
SPV- cell J1		
SPV- cell K1		
SPV- cell L1		
SPV- cell M1		
SPV- cell N1		
SPV- cell O1		
SPV- cell P1		
SPV- cell Q1		
SPV- cell R1		
SPV- cell S1		
SPV- cell T1		
SPV- cell V1		
SPV- cell W1		
SPV- cell X1		
SPV- cell Y1		
SPV- cell Z1		
G01-Purpose	<p>Clarification on how to incorporate UCITS / Collectives / Investment Funds and other items on the 'non-exhaustive' list would be helpful. Information on UCITS will be difficult to obtain, such vehicles generally hold assets backing policyholder liabilities which have no impact on Group Capital/Shareholder Position, and we therefore question the purpose of reporting this information. Clarification on how to incorporate 'Real Estate' and general guidance for 'Funds' i.e. how consolidation should be applied, would be helpful. In general, the volume of data requested will be difficult to achieve.</p>	

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	Total Balance Sheet: more clarification would be helpful here. Should it refer to Net Assets? Should solo numbers be provided or the contributions of each entity in the consolidation? Please clarify.	
G01-Benefits		
G01-Costs		
G01-Application	Our working assumption is that values are required to be reported Gross of Intra Group Transactions, where not explicitly stated as Net. Can you please clarify whether this is correct?	
G01-Materiality		
G01-Disclosure		
G01-Frequency		
G01- cell A1		
G01- cell B1	It is unclear whether this will be a new number to be assigned to the group by EIOPA or if a national code would be used? The question arises as to how non-regulated entities would be treated, should the field be left blank?	
G01- cell C1		
G01- cell D1		
G01- cell E1		
G01- cell F1		
G01- cell G1		
G01- cell H1		
G01- cell I1		
G01- cell J1	How is underwriting performance defined. Is it related to the Variation analysis disclosed under VA-C2C? It is not clear what underwriting performance is. Please provide a definition. Should the reported amount in cell J1 align with the VA template with cell	

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	<p>“change in BOF due to technical provisions”? Clarification whether SII data is required is needed.</p> <p>What is the added value of this field. What is the purpose from a regulatory point of view.</p> <p>How is investment performance defined? Is it related to the Variation analysis disclosed under VA-C2B?</p> <p>It is not clear what investment performance is. Should this be the investment result? Should the reported amount in cell K1 align with the VA template with cell “ change in BOF due to investments”? And should the data be from SII BS ? Please provide clarification. Clarification whether SII data is required is needed.</p>	
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	<p>The log states this cell should indicate if the entity is consolidated in the group consolidated accounts. We query if this relates only to entities which are under dominant influence and therefore fully consolidated (e.g. subsidiaries) or would it also include entities which are under significant influence and therefore equity accounted (e.g. associates)?</p>	

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	It would be helpful to have an example of entities that would not be included in the group consolidated accounts and guidance on how the premium and balance sheet items should be reported for these entities.	
G01- cell T1		
G01- cell U1		
G01- cell V1		
	<p>G04 - Our understanding is that this template is required for entities that are listed in G01, but not covered by G03 reporting. If so, this would be a very extensive list. Since Solvency II is focused on (re)insurance undertakings, it should be allowed to report on a more aggregated level. Asset Management entities could be reported as a whole. Banks which are subject to Basel II could be an exception. Alternatively, a threshold could be introduced to allow that smaller immaterial non-(re)insurance undertakings be reported as a whole.</p> <p>G04 scope/definition is not fully clear/ It defines in scope: regulated entities. Insurance holding companies are not regulated when not also a solo company. Are these non-regulated holding companies part of G04.</p>	
G03 & G04-Purpose		
G03 & G04-Benefits		
G03 & G04-Costs		
G03 & G04-Application		
G03 & G04-Materiality		
G03 & G04-Disclosure		
G03 & G04-Frequency		
G03- cell A1	Identification code – Is this an existing code ? Companies House Number, FSA code?	
G03- cell B1		

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G03- cell C1		
G03- cell D1		
G03- cell E1		
G03- cell F1		
G03- cell G1		
G03- cell H1		
G03- cell I1		
G03- cell J1		
G03- cell K1		
G03- cell L1		
G03- cell M1		
G03- cell N1		
G03- cell O1		
G03- cell P1		
G04- cell A1		
G04- cell A2		
G04- cell B1		
G04- cell C1		
G04- cell D1		
G04- cell E1		
G14-Purpose		
G14-Benefits		
G14-Costs		
	Is this template required to be reported Gross or Net of Reinsurance?	
G14-Application	Clarification would be helpful on how diversification should be treated at Group	

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	level within the context of this template.	
G14-Materiality		
G14-Disclosure		
G14-Frequency		
G14- cell A1		
G14- cell B1		
G14- cell C1		
G14- cell D1		
G14- cell E1		
G14- cell F1		
G14- cell G1		
G14- cell H1		
G14- cell I1		
G14- cell J1		
G14- cell K1		
G14- cell L1		
G14- cell M1		
G14- cell N1		
G14- cell O1		
G14- cell P1		
G14- cell Q1		
G14- cell R1		
G20-Purpose	We query how to complete this template when using a partial/full internal model. If an internal model is used, it may not necessarily follow the same split as in this template.	
G20-Benefits		

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G20-Costs		
G20-Application		
G20-Materiality		
G20-Disclosure		
G20-Frequency		
G20- cell A1		
G20- cell B1		
G20- cell C1		
G20- cell D1		
G20- cell E1		
G20- cell F1		
G20- cell I1		
G20- cell J1		
G20- cell K1		
IGT1 to IGT4-Purpose	There is large amount of duplication between the solo QRTs and the IDT QRTs. Is this because there may be different supervisors for the solo and Group (IGT) templates. If this is the case, can there be exemptions where the solo and Group supervisors are the same.	
IGT1 to IGT4-Benefits		
IGT1 to IGT4-Costs		
IGT1 to IGT4-Application	<p>The reporting of IGT at entity level is unduly onerous requiring a large amount of data to be captured, we would support that some form of aggregate reporting be allowed.</p> <p>We would advocate a pragmatic approach to the valuation of IGTs (e.g. appropriate use of reporting GAAP), given that IGTs should, in any case, eliminate on Group consolidation.</p>	

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We query whether all IGTs should be reported, which had occur during the reporting period, especially as Solvency II is ultimately a measure at a point in time and therefore it is confusing to include items which no longer impact on the solvency position.

All IGT QRTs - Are transactions between Non-Insurance entities required to be reported on the IGT templates, or does one party in the transaction have to be an Insurance entity?

All IGT QRTs - The Summary document indicates that it is anticipated that there would be no duplication of information requested in these templates with the information in the solo templates. Is this because IGT templates are not intended to include Insurance entity information (which is generally already included in the solo templates).

All IGT QRTs – Why are normal course of business transactions that have no capital or risk exposure elements required to be reported? Transactions are at fair value and should not be included here.

IGT1 – For Asset Transfers, does this include all normal purchase and sale of assets between entities?

Do we report here on a transaction by transaction basis, or on an instrument by instrument basis? We recommend reporting on an instrument basis.

IGT1 - Do we start from point zero for the first report, or report historical transactions that are still active? Log file indicates historical transactions that are still active need to be included.

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	<p>IGT2 – Is this a duplication of the Derivates QRTs (D2O and D2T)?</p> <p>IGT2 – Are On-Balance Sheet contingent liabilities to be reported here?</p> <p>IGT2 – Why report guarantees here when they are reported on the Off-Balance Sheet QRT (BS-C1B)? We recommend that they are not reported here.</p> <p>IGT3 – Information is required to be reported on Reinsurance Solo QRTs. Is the purpose of IGT 3 to capture Non EEA or Non Insurance entity transactions? Will there be possible exemptions?</p> <p>IGT3 – Is Inter-fund Reinsurance required to be reported here?</p> <p>IGT4 – Can some clarification be provided as to the scope of contingent liabilities to be reported here? Is this all contingent liabilities?</p>	
IGT1 to IGT4-Materiality		
IGT1 to IGT4-Disclosure		
IGT1 to IGT4-Frequency		
	<p>We assume that collective investment scheme subsidiaries are not included in the scope. We also believe it is unlikely that ISIN codes would be made available on intra-group equity investments, in general, ISIN codes do not exist for internal funding.</p> <p>Clarification would be helpful on whether this includes Intra-Group Trading balances.</p>	
IGT1- cell B6		
IGT1- cell C6		
IGT1- cell D6		
IGT1- cell E6		

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IGT1- cell F6		
IGT1- cell G6		
IGT1- cell H6		
	<p>There should be further definition of the types of transactions to be covered here in order to clarify the scope of this form? Also, does this refer only to transactions during the reporting period? For example, what about where there is an investment in a subsidiary but no transactions during the year but there is a balance at the beginning and end of the year?</p> <p>Or if the only movement is due to impairment or Fair Value movements? For an equity investment would the only transactions to be reported be dividends, investments in equity or reductions in equity during the reporting period?</p>	
IGT1- cell I6		
IGT1- cell J6		
IGT1- cell K6		
IGT1- cell L6		
IGT1- cell M6	Clarification required – Is this value required to be in the Reporting currency?	
	Clarification required – Is this value required to be in the Reporting currency?	
IGT1- cell N6	Is the value required here a clean, or dirty (including accrued interest) value?	
IGT1- cell O6		
IGT1- cell P6		
IGT1- cell Q6		
IGT1- cell R6		
IGT1- cell S6		
IGT2- cell B6		
IGT2- cell C6		
IGT2- cell D6		

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IGT2- cell E6		
IGT2- cell F6		
IGT2- cell G6		
IGT2- cell H6		
IGT2- cell I6		
IGT2- cell J6		
IGT2- cell K6		
IGT2- cell L6		
IGT2- cell M6		
IGT2- cell N6		
IGT2- cell O6		
IGT2- cell P6		
IGT2- cell Q6		
IGT2- cell R6		
IGT2- cell S6		
IGT2- cell T6		
IGT2- cell U6		
IGT2- cell V6		
IGT2- cell W6		
IGT3- cell B6	<p>Clarification would be helpful on whether this template solely relates to internal re-insurance with ceded premiums in the current year. Clarification is required on lines of activities: specify the LOBs; date of signature: signing date/ treaty in force?</p> <p>References are made only to "treaty" - are we to assume that facultative covers not included?</p>	

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IGT3- cell C6		
IGT3- cell D6		
IGT3- cell D6		
IGT3- cell E6		
IGT3- cell F6		
IGT3- cell G6		
IGT3- cell H6		
IGT3- cell I6		
IGT3- cell J6		
IGT3- cell K6		
IGT3- cell L6		
IGT3- cell M6		
IGT3- cell N6		
IGT3- cell O6	<p>Can some examples be provided as to which situations this would be applicable to? Does this indicate that copies of accounts should be provided?</p>	
IGT4- cell B5	<p>As a general comment, we do not believe that reporting of "internal cost sharing", or generic IGT information, would assist in assessing risk management. We would suggest reporting of intra-group transactions in line with existing IFRS requirements.</p> <p>We question the Supervisory purpose of requesting this information; we believe that to list all transactions internally on a cost sharing basis would be overly onerous in comparison to the value gained. Requesting this information on an ad hoc basis could be more appropriate.</p> <p>Further clarification on definition and the transactions expected to be reported in this template would be helpful.</p>	

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IGT4- cell C5	<p>Clarification that this template is intended to capture IGTs other than equity is helpful. There remains the question however as to what off-balance sheet items should be reported. Guarantees are clear, but repos and derivatives are included in the LOG definition, which do not appear on the balance sheet.</p> <p>The granularity of available data will depend on the instrument itself, guidance would be helpful from EIOPA that full reporting of all columns will depend on whether the data request applies/is available on each particular instrument.</p>	
IGT4- cell D5		
IGT4- cell E5		
IGT4- cell F5		
IGT4- cell G5		
IGT4- cell H5		
IGT4- cell I5		
IGT4- cell J5		
IGT4- cell K5		
IGT4- cell L5		
IGT4- cell M5		
IGT4- cell N5		
IGT4- cell O5		
IGT4- cell P5		
RC-Purpose	<p>It's difficult to give a relevant view through only quantitative reporting, since the notion of risk concentration is difficult to define precisely.</p> <p>A pragmatic way could be to combine quantitative reporting such as for example the 10 biggest aggregate exposures to individual counterparties (counterparties in terms of companies / groups of companies; aggregating</p>	

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	<p>equity, bond, derivative, reinsurance and other measurable exposures) with qualitative reporting, asking for the most prominent risk concentrations in terms of product, geography or otherwise to be described briefly qualitatively. If such brief qualitative information triggers the need for deeper information, the supervisor would ask for it when the need arises.</p> <p>We are not convinced that the data gathered is the most efficient means for addressing the supervisor's concerns around risk concentration i.e. the detailed information at a point of time can give only a 'snapshot', whereas there are better tools (e.g. Pillar II/ORSA) to assess the Group's ability to manage and control risk concentration. We are also concerned at the apparent overlap/duplication with the already highly detailed Assets QRTs.</p>	
RC-Benefits		
RC-Costs		
RC-Application		
RC-Materiality		
RC-Disclosure		
RC-Frequency		
RC- cell A2		
RC- cell A3	Is the QRT only asking for one exposure per Counterparty?	
RC- cell A4		
RC- cell A5		
RC- cell A6		
RC- cell A7	Some counterparties do not have credit ratings. What should we report here for these?	
RC- cell A8		
RC- cell A9		

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RC- cell A10		
RC- cell A11		
RC- cell A12		
RC- cell A13		
RC- cell A14		
RC- cell A15		
RC- cell A16	Can a clearer definition be provided?	
RC- cell A17		
RC- cell A18		