

<b>Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>19-juin-13 12:00 CET</b>
Name of Company:	<b>ASSURALIA</b>	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> <li>- Do not change the numbering in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool</li> <li>- Please do not insert or delete any row. If you have no comment on a paragraph or a cell, keep the row empty.</li> <li>- Leave the last column empty.</li> <li>- Please fill in your comment in the relevant row.</li> <li>- Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <ul style="list-style-type: none"> <li>o Certain rows represent a group of cells with similar information (ex : TP-E1- cells A43-L43)</li> <li>o If your comment refers to multiple cells or paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other cells or paragraphs this also applies.</li> <li>o If your comment refers to subparagraphs or specific cells within a group, please indicate this in the comment itself.</li> </ul> </li> </ul> <p>Please send the completed template, in Word Format, to <a href="mailto:CP-13-010@eiopa.europa.eu">CP-13-010@eiopa.europa.eu</a>. Our IT tool does not allow processing of any other formats.</p> <p>The numbering of the paragraphs refers to this Consultation Paper, the numbering of cells refers to the Technical Annexes II and III.</p>		
<b>Reference</b>	<b>Comment</b>	<b>Resolution</b>
<b>General Comments</b>	<p>Assuralia welcomes the opportunity to comment on the Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities.</p> <p>In general, the proposed reporting requirements to National Competent Authorities (NCA's) before Solvency II starts, are burdensome. In order to reduce the reporting burden, the narrative reporting requirements should be lowered if not abolished.</p> <p>If EIOPA decides to take this reporting requirements further, certainty is in that case needed that the templates will be robust and not altered once the Guidelines have been published and that there will be no changes thereafter, not even after the preparatory phase. The fact that EIOPA intends to revisit the reporting requirements during 2013 creates a huge uncertainty and possible extra costs as undertakings have to start preparing now.</p>	

On the connection to Pillar I Solvency requirements, the Guidelines are very ambitious. Guidelines require Pillar I calculations to be carried out reflecting the final Solvency II position. In our view it is critical requiring the complete Pillar I calculation while the legislative process is not completed.

Implementing a new solvency framework is a demanding and time-consuming task requiring a lot of resources, especially for smaller undertakings.

Also, if only 50 % of the market share has to submit quarterly information, the other 50% is not gradually preparing for the quarterly reporting. This may cause additional problems when Solvency II effectively enters into force. From a cost perspective, the combined implementation of quarterly reporting and interim reporting processes may be more efficient.

We also question the benefits of group reporting at this stage. Different approaches to solo reporting between countries and the fact that not all solo entities are required to report will complicate the group consolidation.

In order for undertakings to prepare them properly for the reporting requirements, it is key that EIOPA publishes as soon as possible the relevant or basic risk-free interest rate term structure.

<b>Introduction Comments</b>	<b>General</b>	
1,1		
1,2		
1,3		
1,4		
1,5		
1,6		
1,7		
1,8		
1,9		
1.10		
1,11		
1,12		

1,13	<p>Although undertakings applying for internal model approval do indeed have to provide data relating to both their models and the standard formula, they will not be geared up to report standard formula data using the specific templates.</p> <p>Preparing systems to populate such templates when good progress is being made with the internal model application process would be an extra and unnecessary burden.</p> <p>Further, the requirement to complete such templates goes against what has been set out in the stabilised package, i.e. that these QRTs (SCR-B3 series) are intended for standard formula undertakings only.</p>	
1,14	(See general comments) The narrative reporting should be excluded from the preparatory phase. It is not only overly burdensome; it also risks to double the workload. Since Solvency I still applies during the interim period, undertakings will have to submit information on Solvency I reporting as well as Solvency II reporting.	
1,15	We support EIOPA's proposal that the information to be reported be a subset of the full package, not the package in its entirety. However, further analysis is needed as some templates such as TP-E1 and TP-F1 may need more detailed information derived from other Life and Non-life templates to be fulfilled.	
1,16		
1,17		
1,18		
1,19		
1.20	(See general comments on threshold)	
1,21		
1,22		
1,23		
1,24		
1,25		
<b>Section I. General Comments</b>		
1,26		
1,27		
1,28		

Section II. General Comments		
1,29		
1,30	Thresholds cover 80% of national market share for annual information and 50% for quarterly information when the ECB would in principle cover 80% of the quarterly statements for its own reporting. Harmonization between the two should be achieved and the use of own simplification for quarterly reporting should be permitted	
1,31		
1,32		
1,33		
1,34		
1,35	Notification of insurance and reinsurance undertakings falling into the predefined thresholds should happen as early as possible such that concerned undertakings are timely informed and able to prepare themselves adequately. A notification by the NCA 11 months before the initial submission reference date is considered to be too late.	
1,36	Preparatory Guidelines should be limited to the solo perspective only. If requirements for groups are introduced the thresholds should be consistent with those applied to solo entities. The market shares provided for in Guideline 6 should not be undermined.	
1,37		
1,38	see 1.35	
1,39		
1,40	See 1.35 – this notification ought to be made much earlier: the relevant data currently exist for this. The same notification date should apply also to 1.38	
1,41	Preparatory Guidelines should be limited to the solo perspective only. If requirements for groups are introduced the thresholds should be consistent with those applied to solo entities. The market shares provided for in Guideline 6 should not be undermined.	
1,42		
1,43		
1,44		
1,45		

1,46	(See general comments & paragraph 1,14) If narrative reporting is required, it should only be required at group level, not at solo level.	
<b>Section III. General Comments</b>	For supervisors to have a good understanding on the composition of the Solvency Capital Requirements, undertakings should also provide some information on the application of the look through approach.	
1,47	It is not clear why the Best Estimate of technical provisions at solo annual level is required by country? The calculation per country is much more detailed and burdensome. It is proposed that the calculation of the technical provisions as a whole should be sufficient.	
1,48		
1,49		
1.50		
1,51		
1,52	(See general comments) It is critical requiring the complete Pillar I calculation while the legislative process is not completed. If the legislative process is not completed, Pillar I elements cannot be part of the preparatory reporting.	
1,53		
1,54		
1,55		
1,56		
1,57		
1,58		
1,59	See general comments on group's reporting and on reporting of Pillar I calculations.	
<b>Section IV. General Comments</b>	See general comments on narrative reporting	

1.60	If the purpose of these Guidelines is to assess progress towards achieving compliance with SII requirements, spending time and resources producing narrative that describes a temporary situation (temporary, because undertakings will be in the course of making progress towards achieving compliance) seems unduly burdensome. We believe that NCAs will be able to assess progress towards Pillar II compliance via the means proposed for the System of Governance. We therefore do not believe the Guidelines proposed on the narrative reporting are necessary.	
1,61		
1,62		
1,63		
1,64	"Any other material information" is very vague and should be clarified by EIOPA.	
1,65	If groups provide a narrative reporting on governance, fit & proper, risk management and the internal control system, it seems unnecessary to require an additional narrative reporting on these aspects for each of group subsidiaries. Therefore, it is proposed to drop the narrative reporting requirement for subsidiaries if the group provides a complete narrative reporting on these elements.	
1,66		
1,67		
<b>Section V. General Comments</b>		
1,68		
1,69		
<b>Section VI. General Comments</b>		
1.70		
1,71		
1,72		
1,73		
1,74		
1,75		
1,76		

1,77		
<b>Section VII. General Comments</b>	EIOPA and NCAs need to allow for the fact that any policy or documented process might not be fully operational as at the time of implementing these Guidelines.	
1,78	The relevance of a guideline on a description of the reporting processes themselves during the interim period is seriously questioned. This relates to the internal controls of the reporting processes and not really with the reporting itself anymore. Since requirements on the internal control system already are included in the interim measures relating to the system of governance, it is proposed to drop this guideline here.	
<b>Section VIII. General Comments</b>		
1,79	During the interim period undertakings will be required to report Solvency II figures in addition to the Solvency I figures. A reasonable period of time should be foreseen for undertakings to prepare these additional reports. It is proposed to extend the reporting deadline of the annual figures of 20 weeks with at least 5 more weeks.	
1.80		
1,81	The extension of the deadline (6 weeks) for quantitative group reporting should also hold for quantitative solo reporting (see comment paragraph 1,79).  The extension of the deadline (6 weeks) for quantitative group reporting should also hold for qualitative group reporting (narrative reporting) (see comment paragraph 1,82).	
1,82	In order to avoid inconsistent application of the guidelines it should be indicated that the reporting of the qualitative information should be submitted within the same time constraints but not before the reporting of the related quantitative information. As such, an extension of the submission deadline for the quantitative part should result in an extension of the submission deadline of the qualitative part.	
<b>Section IX. General Comments</b>		
1,83		
1,84		
1,85		
1,86		
1,87		

1,88	The extensive data checks will increase the workload and costs for the undertaking. Automatically built-in data checks would relieve the workload and therefore would be much appreciated.	
<b>Compliance and Reporting Rules General Comments</b>		
1,89		
1.90		
1,91		
1,92		
<b>Technical Annex I General Comments</b>		
BI-1		
BS-C1-2		
BS-C1-3		
BS-C1D-4		
AS-D1-5		
AS-D1-6		
AS-D20-7		
AS-D20-8		
TP-F1-9		
TP-E1-10		
TP-F1Q-11		
TP-E1Q-12		
OF-B1Q-13		
SCR-B2A-14		
SCR-B2A-15		
SCR-B2B-16		
SCR-B2B-17		
SCR-B2C-18		



SCR-B2C-19		
SCR-B3A-20		
SCR-B3A-21		
SCR-B3B-22		
SCR-B3B-23		
SCR-B3C-24		
SCR-B3C-25		
SCR-B3D-26		
SCR-B3D-27		
SCR-B3E-28		
SCR-B3E-29		
SCR-B3F-30		
SCR-B3F-31		
SCR-B3G-32		
SCR-B3G-33		
MCR-B4A-34		
MCR-B4B-35		
G01-36		
G03-37		
G03-38		
G03-39		
G04-40		
G14-41		
<b>Technical Annex II General Comments</b>		
<b>Technical Annex III General Comments</b>		
<b>BI - General Comments</b>		
BI- cell A1		

BI- cell A2		
BI- cell A3		
BI- cell A4		
BI- cell A5		
BI- cell A6		
BI- cell A7		
BI- cell A8		
BI- cell A9		
BI- cell A10		
<b>BS-C1 - General Comment</b>		
BS-C1- cell AS1		
BS-C1- cell AS24		
BS-C1- cell A2		
BS-C1- cell A26		
BS-C1- cell A25B		
BS-C1- cell A3		
BS-C1- cell A4		
BS-C1- cell A5		
BS-C1- cell A6		
BS-C1- cell A7B		
BS-C1- cell A7		
BS-C1- cell A7A		
BS-C1- cell A8E		
BS-C1- cell A8		
BS-C1- cell A8A		
BS-C1- cell A8C		
BS-C1- cell A8D		
BS-C1- cell A9		

BS-C1- cell A10A		
BS-C1- cell A10B		
BS-C1- cell A11		
BS-C1- cell A12		
BS-C1- cell A14		
BS-C1- cell A14B		
BS-C1- cell A14C		
BS-C1- cell A14A		
BS-C1- cell A16		
BS-C1- cell A17A		
BS-C1- cell A17		
BS-C1- cell A18		
BS-C1- cell A19B		
BS-C1- cell A18A		
BS-C1- cell A19		
BS-C1- cell A19A		
BS-C1- cell A13		
BS-C1- cell A21		
BS-C1- cell A20		
BS-C1- cell A23		
BS-C1- cell A28A		
BS-C1- cell A28B		
BS-C1- cell A27		
BS-C1- cell A29		
BS-C1- cell A30		
BS-C1- cell LS0		
BS-C1- cell L1		
BS-C1- cell L1A		
BS-C1- cell L2		

BS-C1- cell L3		
BS-C1- cell L4		
BS-C1- cell L4A		
BS-C1- cell L5		
BS-C1- cell L6		
BS-C1- cell LS6F		
BS-C1- cell L6B		
BS-C1- cell L6C		
BS-C1- cell L6D		
BS-C1- cell L6E		
BS-C1- cell L7		
BS-C1- cell L7A		
BS-C1- cell L8		
BS-C1- cell L9		
BS-C1- cell L10		
BS-C1- cell L10A		
BS-C1- cell L11		
BS-C1- cell L12		
BS-C1- cell LS14		
BS-C1- cell L23		
BS-C1- cell L18		
BS-C1- cell L22		
BS-C1- cell L13		
BS-C1- cell L17		
BS-C1- cell L16		
BS-C1- cell L19		
BS-C1- cell L20		
BS-C1- cell L15A		
BS-C1- cell L15B		

BS-C1- cell L15C		
BS-C1- cell L15E		
BS-C1- cell L15D		
BS-C1- cell L26		
BS-C1- cell L25		
BS-C1- cell L25A		
BS-C1- cell L27		
<b>BS-C1D - General Comments</b>		
BS-C1D- cell A1		
BS-C1D- cell B1		
BS-C1D- cell A3		
BS-C1D- cell A4		
BS-C1D- cell A5		
BS-C1D- cell A5A		
BS-C1D- cell A6		
BS-C1D- cell A7		
BS-C1D- cell A7A		
BS-C1D- cell A8		
BS-C1D- cell A9		
BS-C1D- cell A10		
BS-C1D- cell A11		
BS-C1D- cell A12		
BS-C1D- cell A13		
BS-C1D- cell A14		
BS-C1D- cell A15		
<b>AS-D1- General Comment</b>		
AS-D1- cell A1		

AS-D1- cell A2		
AS-D1- cell A3		
AS-D1- cell A4		
AS-D1- cell A5		
AS-D1- cell A6		
AS-D1- cell A7		
AS-D1- cell A8		
AS-D1- cell A9		
AS-D1- cell A10		
AS-D1- cell A11		
AS-D1- cell A12		
AS-D1- cell A13		
AS-D1- cell A15		
AS-D1- cell A16		
AS-D1- cell A17		
AS-D1- cell A18		
AS-D1- cell A20		
AS-D1- cell A22		
AS-D1- cell A23		
AS-D1- cell A24		
AS-D1- cell A25		
AS-D1- cell A26		
AS-D1- cell A28	What is the maturity for a mortgage loan to the senior management or to others? Is it the weighted average maturity date, the maximum maturity date, the minimum maturity date, ...	
AS-D1- cell A30		
AS-D1- cell A50		
<b>AS-D20- Comments</b>	<b>General</b>	

AS-D20- cell A1		
AS-D20- cell A2		
AS-D20- cell A3		
AS-D20- cell A4		
AS-D20- cell A5		
AS-D20- cell A6		
AS-D20- cell A7		
AS-D20- cell A8		
AS-D20- cell A9		
AS-D20- cell A10		
AS-D20- cell A11		
AS-D20- cell A13		
AS-D20- cell A14		
AS-D20- cell A15		
AS-D20- cell A16		
AS-D20- cell A17		
AS-D20- cell A19		
AS-D20- cell A20		
AS-D20- cell A21		
AS-D20- cell A22		
AS-D20- cell A23		
AS-D20- cell A24		
AS-D20- cell A25		
AS-D20- cell A26		
AS-D20- cell A27		
AS-D20- cell A28		
AS-D20- cell A29		
AS-D20- cell A31		
AS-D20- cell A32		

AS-D20- cell A33		
AS-D20- cell A34		
AS-D20- cell A35		
AS-D20- cell A50		
<b>TP-F1- General Comments</b>		
TP-F1- cell J1,J2,J4,J6,J7,J9,J10,J12,J13 ,J14		
TP-F1- cell JA1,JA2,JA4,JA6,JA7,JA9,JA1 0,JA12,JA13,JA14		
TP-F1- cell JE1,JE2,JE4,JE6,JE7,JE9,JE1 0,JE12,JE13,JE14		
TP-F1- cell JF1,JF2,JF4,JF6,JF7,JF9,JF10 ,JF12,JF13,JF14		
<b>TP-E1- General Comments</b>		
TP-E1- cells A43-L43		
TP-E1- cells A44-L44		
TP-E1- cells A45-L45		
TP-E1- cells A46-L46		
TP-E1- cells Q43-Q46		
<b>TP-F1Q- General Comments</b>	Can the quarterly templates have the same lay-out as the annual templates? For example TP-F1 needs to be provided on yearly basis while TP_F1Q is required on quarterly basis. The content of the TP-F1Q is however reduced. Can we use the TP-F1 template to report the quarterly figures?	
TP-F1Q- cells A1		
TP-F1Q- cells A3		
TP-F1Q- cells A5		



TP-F1Q- cells A6		
TP-F1Q- cells A7		
TP-F1Q- cells A7A		
TP-F1Q- cells A7B		
TP-F1Q- cells A7C		
TP-F1Q- cells A9		
TP-F1Q- cells A10		
TP-F1Q- cells A12		
TP-F1Q- cells A13		
TP-F1Q- cells A14		
TP-F1Q- cells B1		
TP-F1Q- cells B2		
TP-F1Q- cells B3		
TP-F1Q- cells B4		
TP-F1Q- cells B5		
TP-F1Q- cells B6		
TP-F1Q- cells B7		
TP-F1Q- cells B9		
TP-F1Q- cells B10		
TP-F1Q- cells B11		
TP-F1Q- cells B12		
TP-F1Q- cells B13		
TP-F1Q- cells B14		
TP-F1Q- cells C1		
TP-F1Q- cells C2		
TP-F1Q- cells C3		
TP-F1Q- cells C4		
TP-F1Q- cells C5		
TP-F1Q- cells C6		

TP-F1Q- cells C7		
TP-F1Q- cells C9		
TP-F1Q- cells C10		
TP-F1Q- cells C11		
TP-F1Q- cells C12		
TP-F1Q- cells C13		
TP-F1Q- cells C14		
TP-F1Q- cells E1		
TP-F1Q- cells E2		
TP-F1Q- cells E4		
TP-F1Q- cells E6		
TP-F1Q- cells E7		
TP-F1Q- cells E9		
TP-F1Q- cells E10		
TP-F1Q- cells E12		
TP-F1Q- cells E13		
TP-F1Q- cells E14		
TP-F1Q- cells F1		
TP-F1Q- cells F2		
TP-F1Q- cells F4		
TP-F1Q- cells F6		
TP-F1Q- cells F7		
TP-F1Q- cells F9		
TP-F1Q- cells F10		
TP-F1Q- cells F12		
TP-F1Q- cells F13		
TP-F1Q- cells F14		
<b>TP-E1Q- Comments</b>	<b>General</b>	

TP-E1Q- cells A1-P1		
TP-E1Q- cells Q1		
TP-E1Q- cells A5-P5		
TP-E1Q- cells A12-P12		
TP-E1Q- cells A13-P13		
TP-E1Q- cells Q5-Q13		
TP-E1Q- cells A14-P14		
TP-E1Q- cells A21-P21		
TP-E1Q- cells A22-P22		
TP-E1Q- cells Q14-Q22		
TP-E1Q- cells A23-P23		
TP-E1Q- cells A24-P24		
TP-E1Q- cells A25-P25		
TP-E1Q- cells Q23		
TP-E1Q- cells Q24		
TP-E1Q- cells Q25		
TP-E1Q- cells A26-P26		
TP-E1Q- cells A27-P27		
TP-E1Q- cells A28-P28		
TP-E1Q- cells Q26		
TP-E1Q- cells Q27		
TP-E1Q- cells Q28		
<b>OF-B1Q - General Comments</b>		
OF-B1Q- cell A1		
OF-B1Q- cell B1		
OF-B1Q- cell C1		
OF-B1Q- cell A1A		
OF-B1Q- cell C1A		

OF-B1Q- cell A2		
OF-B1Q- cell B2		
OF-B1Q- cell C2		
OF-B1Q- cell A3		
OF-B1Q- cell B3		
OF-B1Q- cell C3		
OF-B1Q- cell A4		
OF-B1Q- cell B4		
OF-B1Q- cell C4		
OF-B1Q- cell D4		
OF-B1Q- cell A5		
OF-B1Q- cell B5		
OF-B1Q- cell C5		
OF-B1Q- cell D5		
OF-B1Q- cell A6		
OF-B1Q- cell B6		
OF-B1Q- cell A7		
OF-B1Q- cell B7		
OF-B1Q- cell A8		
OF-B1Q- cell B8		
OF-B1Q- cell C8		
OF-B1Q- cell D8		
OF-B1Q- cell A9		
OF-B1Q- cell B9		
OF-B1Q- cell C9		
OF-B1Q- cell D9		
OF-B1Q- cell A10		
OF-B1Q- cell B10		
OF-B1Q- cell C10		

OF-B1Q- cell D10		
OF-B1Q- cell A11		
OF-B1Q- cell B11		
OF-B1Q- cell C11		
OF-B1Q- cell D11		
OF-B1Q- cell A12		
OF-B1Q- cell B12		
OF-B1Q- cell A12A		
OF-B1Q- cell B12A		
OF-B1Q- cell A13		
OF-B1Q- cell B13		
OF-B1Q- cell C13		
OF-B1Q- cell D13		
OF-B1Q- cell A14		
OF-B1Q- cell B14		
OF-B1Q- cell C14		
OF-B1Q- cell D14		
OF-B1Q- cell A15		
OF-B1Q- cell D15		
OF-B1Q- cell A15A		
OF-B1Q- cell D15A		
OF-B1Q- cell A16		
OF-B1Q- cell B16		
OF-B1Q- cell B16A		
OF-B1Q- cell C16		
OF-B1Q- cell D16		
OF-B1Q- cell A17		
OF-B1Q- cell B17		
OF-B1Q- cell B17A		

OF-B1Q- cell C17		
OF-B1Q- cell D17		
OF-B1Q- cell A18		
OF-B1Q- cell B18		
OF-B1Q- cell B18A		
OF-B1Q- cell C18		
OF-B1Q- cell D18		
OF-B1Q- cell A19		
OF-B1Q- cell B19		
OF-B1Q- cell B19A		
OF-B1Q- cell C19		
OF-B1Q- cell D19		
OF-B1Q- cell B502		
OF-B1Q- cell A503		
OF-B1Q- cell B503		
OF-B1Q- cell C503		
OF-B1Q- cell D503		
OF-B1Q- cell A603		
OF-B1Q- cell B603		
OF-B1Q- cell C603		
OF-B1Q- cell D603		
OF-B1Q- cell A604		
OF-B1Q- cell B604		
OF-B1Q- cell C604		
OF-B1Q- cell D604		
OF-B1Q- cell E604		
OF-B1Q- cell A605		
OF-B1Q- cell B605		
OF-B1Q- cell C605		

OF-B1Q- cell D605		
OF-B1Q- cell E605		
OF-B1Q- cell A606		
OF-B1Q- cell B606		
OF-B1Q- cell C606		
OF-B1Q- cell D606		
OF-B1Q- cell E606		
OF-B1Q- cell A607		
OF-B1Q- cell B607		
OF-B1Q- cell C607		
OF-B1Q- cell D607		
OF-B1Q- cell E607		
OF-B1Q- cell A20		
OF-B1Q- cell B20		
OF-B1Q- cell B20A		
OF-B1Q- cell C20		
OF-B1Q- cell D20		
OF-B1Q- cell A21		
OF-B1Q- cell B21		
OF-B1Q- cell B21A		
OF-B1Q- cell C21		
OF-B1Q- cell D21		
OF-B1Q- cell A42		
OF-B1Q- cell C42		
OF-B1Q- cell D42		
OF-B1Q- cell A43		
OF-B1Q- cell C43		
OF-B1Q- cell D43		
OF-B1Q- cell A44		

OF-B1Q- cell C44		
OF-B1Q- cell D44		
OF-B1Q- cell A46		
OF-B1Q- cell B46		
OF-B1Q- cell C46		
OF-B1Q- cell D46		
OF-B1Q- cell E46		
OF-B1Q- cell A47		
OF-B1Q- cell B47		
OF-B1Q- cell C47		
OF-B1Q- cell D47		
OF-B1Q- cell A50		
OF-B1Q- cell B50		
OF-B1Q- cell C50		
OF-B1Q- cell D50		
OF-B1Q- cell E50		
OF-B1Q- cell A51		
OF-B1Q- cell B51		
OF-B1Q- cell C51		
OF-B1Q- cell D51		
OF-B1Q- cell A52		
OF-B1Q- cell A53		
OF-B1Q- cell A45		
OF-B1Q- cell A45A		
OF-B1Q- cell A45B		
OF-B1Q- cell A45C		
OF-B1Q- cell A45D		
OF-B1Q- cell B45D		
OF-B1Q- cell C45D		



OF-B1Q- cell D45D		
OF-B1Q- cell E45D		
OF-B1Q- cell A45E		
OF-B1Q- cell B45E		
OF-B1Q- cell C45E		
OF-B1Q- cell D45E		
OF-B1Q- cell E45E		
OF-B1Q- cell A48		
OF-B1Q- cell B48		
OF-B1Q- cell C48		
OF-B1Q- cell D48		
OF-B1Q- cell E48		
OF-B1Q- cell A49		
OF-B1Q- cell B49		
OF-B1Q- cell C49		
OF-B1Q- cell D49		
OF-B1Q- cell A50A		
OF-B1Q- cell B50A		
OF-B1Q- cell C50A		
OF-B1Q- cell D50A		
OF-B1Q- cell E50A		
OF-B1Q- cell A51A		
OF-B1Q- cell B51A		
OF-B1Q- cell C51A		
OF-B1Q- cell D51A		
OF-B1Q- cell A52A		
OF-B1Q- cell A53A		
OF-B1Q- cell A53B		
OF-B1Q- cell B23		

OF-B1Q- cell B24		
OF-B1Q- cell B25		
OF-B1Q- cell B26		
OF-B1Q- cell B27		
OF-B1Q- cell B28		
OF-B1Q- cell B29		
OF-B1Q- cell B29A		
OF-B1Q- cell A30		
OF-B1Q- cell A31		
OF-B1Q- cell A32		
<b>SCR - B2A - General Comment</b>		
SCR - B2A - cell A1		
SCR - B2A - cell B1		
SCR - B2A - cell A01		
SCR - B2A - cell A2		
SCR - B2A - cell B2		
SCR - B2A - cell A02		
SCR - B2A - cell A3		
SCR - B2A - cell B3		
SCR - B2A - cell A03		
SCR - B2A - cell A4		
SCR - B2A - cell B4		
SCR - B2A - cell A04		
SCR - B2A - cell A5		
SCR - B2A - cell B5		
SCR - B2A - cell A05		
SCR - B2A - cell A6		
SCR - B2A - cell B6		

SCR - B2A - cell A7		
SCR - B2A - cell B7		
SCR - B2A - cell A07		
SCR - B2A - cell A10		
SCR - B2A - cell B10		
SCR - B2A - cell A11		
SCR - B2A - cell A12		
SCR - B2A - cell A13		
SCR - B2A - cell A013		
SCR - B2A - cell A14A		
SCR - B2A - cell A14C		
SCR - B2A - cell A8		
SCR - B2A - cell A9		
SCR - B2A - cell A17		
SCR - B2A - cell A15		
SCR - B2A - cell A15A		
SCR - B2A - cell A15B		
SCR - B2A - cell A15C		
SCR - B2A - cell A16		
SCR - B2A - cell A18		
SCR - B2A - cell A20		
SCR - B2A - cell A21		
SCR - B2A - cell A14B		
SCR - B2A - cell A14		
SCR - B2A - cell A11A		
SCR - B2A - cell A11B		
<b>SCR - B2B - General Comment</b>		
SCR - B2B- cell A1		

SCR - B2B- cell A1A		
SCR - B2B- cell A1B		
SCR - B2B- cell A1C		
SCR - B2B- cell B1		
SCR - B2B- cell C1		
SCR - B2B- cell B2		
SCR - B2B- cell C2		
SCR - B2B- cell B3		
SCR - B2B- cell C3		
SCR - B2B- cell B4		
SCR - B2B- cell C4		
SCR - B2B- cell B5		
SCR - B2B- cell B6		
SCR - B2B- cell B7		
SCR - B2B- cell C5		
SCR - B2B- cell C6		
SCR - B2B- cell B8		
SCR - B2B- cell B8AA		
SCR - B2B- cell B8A		
SCR - B2B- cell A11A		
SCR - B2B- cell A11B		
<b>SCR - B2C - General Comment</b>		
SCR - B2C- cell A1		
SCR - B2C- cell A1A		
SCR - B2C- cell A1B		
SCR - B2C- cell A1C		
SCR - B2C- cell B1		
SCR - B2C- cell C1		

SCR - B2C- cell B2		
SCR - B2C- cell C2		
SCR - B2C- cell B3		
SCR - B2C- cell C3		
SCR - B2C- cell B4		
SCR - B2C- cell C4		
SCR - B2C- cell B5		
SCR - B2C- cell B6		
SCR - B2C- cell B7		
SCR - B2C- cell B7A		
SCR - B2C- cell B7B		
SCR - B2C- cell B7C		
SCR - B2C- cell B8		
SCR - B2C- cell B9		
SCR - B2C- cell B10		
SCR - B2C- cell B12		
SCR - B2C- cell B13		
SCR - B2C- cell C5		
SCR - B2C- cell C6		
SCR - B2C- cell B14		
SCR - B2C- cell B14AA		
SCR - B2C- cell B14A		
SCR - B2C- cell A11A		
SCR - B2C- cell A11B		
<b>SCR - B3A - General Comment</b>		
SCR - B3A - cell A00		
SCR - B3A - cell AA01		
SCR - B3A - cell AA02		

SCR - B3A - cell AA03		
SCR - B3A - cel A30		
SCR - B3A- cell C0		
SCR - B3A- cell D0		
SCR - B3A- cell A1		
SCR - B3A- cell A2		
SCR - B3A- cell A1A		
SCR - B3A- cell A2A		
SCR - B3A- cell B1		
SCR - B3A- cell B2		
SCR - B3A- cell B1A		
SCR - B3A- cell B2A		
SCR - B3A- cell C1		
SCR - B3A- cell C2		
SCR - B3A- cell B1B		
SCR - B3A- cell B2B		
SCR - B3A- cell D1		
SCR - B3A- cell D2		
SCR - B3A- cell C3		
SCR - B3A- cell D3		
SCR - B3A- cell A4		
SCR - B3A- cell A4A		
SCR - B3A- cell B4		
SCR - B3A- cell B4A		
SCR - B3A- cell C4		
SCR - B3A- cell B4B		
SCR - B3A- cell D4		
SCR - B3A- cell A5		
SCR - B3A- cell B5		

SCR - B3A- cell A6		
SCR - B3A- cell B6		
SCR - B3A- cell A7		
SCR - B3A- cell B7		
SCR - B3A- cell A8		
SCR - B3A- cell A8A		
SCR - B3A- cell B8		
SCR - B3A- cell B8A		
SCR - B3A- cell C8		
SCR - B3A- cell B8B		
SCR - B3A- cell D8		
SCR - B3A- cell A9		
SCR - B3A- cell B9		
SCR - B3A- cell A10		
SCR - B3A- cell B10		
SCR - B3A- cell A11		
SCR - B3A- cell B11		
SCR - B3A- cell A12		
SCR - B3A- cell A12A		
SCR - B3A- cell B12		
SCR - B3A- cell B12A		
SCR - B3A- cell C12		
SCR - B3A- cell B12B		
SCR - B3A- cell D12		
SCR - B3A- cell C13		
SCR - B3A- cell D13		
SCR - B3A- cell A14		
SCR - B3A- cell A14A		
SCR - B3A- cell B14		

SCR - B3A- cell B14A		
SCR - B3A- cell C14		
SCR - B3A- cell B14B		
SCR - B3A- cell D14		
SCR - B3A- cell C15		
SCR - B3A- cell D15		
SCR - B3A- cell A16		
SCR - B3A- cell A16A		
SCR - B3A- cell B16		
SCR - B3A- cell B16A		
SCR - B3A- cell C16		
SCR - B3A- cell B16B		
SCR - B3A- cell D16		
SCR - B3A- cell A17		
SCR - B3A- cell A17A		
SCR - B3A- cell B17		
SCR - B3A- cell B17A		
SCR - B3A- cell C17		
SCR - B3A- cell B17B		
SCR - B3A- cell D17		
SCR - B3A- cell A18		
SCR - B3A- cell A18A		
SCR - B3A- cell B18		
SCR - B3A- cell B18A		
SCR - B3A- cell C18		
SCR - B3A- cell B18B		
SCR - B3A- cell D18		
SCR - B3A- cell A19		
SCR - B3A- cell A19A		



SCR - B3A- cell C19		
SCR - B3A- cell D19		
SCR - B3A- cell A20		
SCR - B3A- cell A20A		
SCR - B3A- cell C20		
SCR - B3A- cell D20		
SCR - B3A- cell C22		
SCR - B3A- cell D22		
SCR - B3A- cell C23		
SCR - B3A- cell D23		
<b>SCR - B3B - General Comment</b>		
SCR - B3B - cell A00		
SCR - B3B - cell A001		
SCR - B3B - cell A30		
SCR - B3B - cell A10		
SCR - B3B- cell A1		
SCR - B3B- cell B1		
SCR - B3B- cell C0		
SCR - B3B- cell C1		
SCR - B3B- cell A2		
SCR - B3B- cell A3		
SCR - B3B- cell C3		
SCR - B3B- cell D4		
SCR - B3B- cell C4		
<b>SCR - B3C - General Comment</b>		
SCR - B3C - cell A01		
SCR - B3C - cell A02		

SCR - B3C - cell A03		
SCR - B3C - cell A04		
SCR - B3C - cell A05		
SCR - B3C - cell A06		
SCR - B3C - cell A001		
SCR - B3C - cell A30		
SCR - B3C- cell A1		
SCR - B3C- cell A1A		
SCR - B3C- cell B1		
SCR - B3C- cell B1A		
SCR - B3C- cell C1		
SCR - B3C- cell B1B		
SCR - B3C- cell D1		
SCR - B3C- cell A2		
SCR - B3C- cell A2A		
SCR - B3C- cell B2		
SCR - B3C- cell B2A		
SCR - B3C- cell C2		
SCR - B3C- cell B2B		
SCR - B3C- cell D2		
SCR - B3C- cell A3		
SCR - B3C- cell A3A		
SCR - B3C- cell B3		
SCR - B3C- cell B3A		
SCR - B3C- cell C3		
SCR - B3C- cell B3B		
SCR - B3C- cell D3		
SCR - B3C- cell C04		
SCR - B3C- cell D04		

SCR - B3C- cell A4		
SCR - B3C- cell A4A		
SCR - B3C- cell B4		
SCR - B3C- cell B4A		
SCR - B3C- cell C4		
SCR - B3C- cell B4B		
SCR - B3C- cell D4		
SCR - B3C- cell A5		
SCR - B3C- cell A5A		
SCR - B3C- cell B5		
SCR - B3C- cell B5A		
SCR - B3C- cell C5		
SCR - B3C- cell B5B		
SCR - B3C- cell D5		
SCR - B3C- cell A6		
SCR - B3C- cell A6A		
SCR - B3C- cell B6		
SCR - B3C- cell B6A		
SCR - B3C- cell C6		
SCR - B3C- cell B6B		
SCR - B3C- cell D6		
SCR - B3C- cell A7		
SCR - B3C- cell A7A		
SCR - B3C- cell B7		
SCR - B3C- cell B7A		
SCR - B3C- cell C7		
SCR - B3C- cell B7B		
SCR - B3C- cell D7		
SCR - B3C- cell A8		

SCR - B3C- cell A8A		
SCR - B3C- cell B8		
SCR - B3C- cell B8A		
SCR - B3C- cell C8		
SCR - B3C- cell B8B		
SCR - B3C- cell D8		
SCR - B3C- cell A9		
SCR - B3C- cell A9A		
SCR - B3C- cell B9		
SCR - B3C- cell B9A		
SCR - B3C- cell C9		
SCR - B3C- cell B9B		
SCR - B3C- cell D9		
SCR - B3C- cell C10		
SCR - B3C- cell D10		
SCR - B3C- cell C11		
SCR - B3C- cell D11		
<b>SCR - B3D - General Comment</b>		
SCR - B3D - cell A01		
SCR - B3D - cell A02		
SCR - B3D - cell A03		
SCR - B3D - cell A04		
SCR - B3D - cell A05		
SCR - B3C - cell A001		
SCR - B3C - cell A30		
SCR - B3D- cell A1		
SCR - B3D- cell A1A		
SCR - B3D- cell B1		

SCR - B3D- cell B1A		
SCR - B3D- cell C1		
SCR - B3D- cell B1B		
SCR - B3D- cell D1		
SCR - B3D- cell A2		
SCR - B3D- cell A2A		
SCR - B3D- cell B2		
SCR - B3D- cell B2A		
SCR - B3D- cell C2		
SCR - B3D- cell B2B		
SCR - B3D- cell D2		
SCR - B3D- cell A3		
SCR - B3D- cell A3A		
SCR - B3D- cell B3		
SCR - B3D- cell B3A		
SCR - B3D- cell C3		
SCR - B3D- cell B3B		
SCR - B3D- cell D3		
SCR - B3D- cell C04		
SCR - B3D- cell D04		
SCR - B3D- cell A4		
SCR - B3D- cell A4A		
SCR - B3D- cell B4		
SCR - B3D- cell B4A		
SCR - B3D- cell C4		
SCR - B3D- cell B4B		
SCR - B3D- cell D4		
SCR - B3D- cell A5		
SCR - B3D- cell A5A		

SCR - B3D- cell B5		
SCR - B3D- cell B5A		
SCR - B3D- cell C5		
SCR - B3D- cell B5B		
SCR - B3D- cell D5		
SCR - B3D- cell A6		
SCR - B3D- cell A6A		
SCR - B3D- cell B6		
SCR - B3D- cell B6A		
SCR - B3D- cell C6		
SCR - B3D- cell B6B		
SCR - B3D- cell D6		
SCR - B3D- cell A7		
SCR - B3D- cell A7A		
SCR - B3D- cell B7		
SCR - B3D- cell B7A		
SCR - B3D- cell C7		
SCR - B3D- cell B7B		
SCR - B3D- cell D7		
SCR - B3D- cell A8		
SCR - B3D- cell A8A		
SCR - B3D- cell B8		
SCR - B3D- cell B8A		
SCR - B3D- cell C8		
SCR - B3D- cell B8B		
SCR - B3D- cell D8		
SCR - B3D- cell C9		
SCR - B3D- cell D9		
SCR - B3D- cell C10		

SCR - B3D- cell D10		
SCR - B3D- cell C12		
SCR - B3D- cell D12		
SCR - B3D- cell E12		
SCR - B3D- cell F12		
SCR - B3D- cell C13		
SCR - B3D- cell D13		
SCR - B3D- cell E13		
SCR - B3D- cell F13		
SCR - B3D- cell C14		
SCR - B3D- cell D14		
SCR - B3D- cell E14		
SCR - B3D- cell F14		
SCR - B3D- cell C15		
SCR - B3D- cell D15		
SCR - B3D- cell E15		
SCR - B3D- cell F15		
SCR - B3D- cell A16		
SCR - B3D- cell F16		
SCR - B3D- cell A17		
SCR - B3D- cell A18		
SCR - B3D- cell A18A		
SCR - B3D- cell B18		
SCR - B3D- cell B18B		
SCR - B3D- cell D18		
SCR - B3D- cell D19		
SCR - B3D- cell D20		
SCR - B3D- cell B21		
SCR - B3D- cell A21		

SCR - B3D- cell B22		
SCR - B3D- cell A22		
SCR - B3D- cell B23		
SCR - B3D- cell A23		
SCR - B3D- cell B24		
SCR - B3D- cell A24		
SCR - B3D- cell B25		
SCR - B3D- cell A25		
SCR - B3D- cell B26		
SCR - B3D- cell A26		
SCR - B3D- cell B27		
SCR - B3D- cell A27		
<b>SCR - B3E - General Comment</b>		
SCR - B3E- cell A001		
SCR - B3E- cell A30		
SCR - B3E- cell C1		
SCR - B3E- cell D1		
SCR - B3E- cell E1		
SCR - B3E- cell F1		
SCR - B3E- cell C2		
SCR - B3E- cell D2		
SCR - B3E- cell E2		
SCR - B3E- cell F2		
SCR - B3E- cell C3		
SCR - B3E- cell D3		
SCR - B3E- cell E3		
SCR - B3E- cell F3		
SCR - B3E- cell C4		



SCR - B3E- cell D4		
SCR - B3E- cell E4		
SCR - B3E- cell F4		
SCR - B3E- cell C5		
SCR - B3E- cell D5		
SCR - B3E- cell E5		
SCR - B3E- cell F5		
SCR - B3E- cell C6		
SCR - B3E- cell D6		
SCR - B3E- cell E6		
SCR - B3E- cell F6		
SCR - B3E- cell C7		
SCR - B3E- cell D7		
SCR - B3E- cell E7		
SCR - B3E- cell F7		
SCR - B3E- cell C8		
SCR - B3E- cell D8		
SCR - B3E- cell E8		
SCR - B3E- cell F8		
SCR - B3E- cell C9		
SCR - B3E- cell D9		
SCR - B3E- cell E9		
SCR - B3E- cell F9		
SCR - B3E- cell C10		
SCR - B3E- cell D10		
SCR - B3E- cell E10		
SCR - B3E- cell F10		
SCR - B3E- cell C11		
SCR - B3E- cell D11		

SCR - B3E- cell E11		
SCR - B3E- cell F11		
SCR - B3E- cell C12		
SCR - B3E- cell D12		
SCR - B3E- cell E12		
SCR - B3E- cell F12		
SCR - B3E- cell A13		
SCR - B3E- cell F13		
SCR - B3E- cell A14		
SCR - B3E- cell A15		
SCR - B3E- cell A15A		
SCR - B3E- cell B15		
SCR - B3E- cell B15A		
SCR - B3E- cell C15		
SCR - B3E- cell A16		
SCR - B3E- cell A17		
SCR - B3E- cell A18		
<b>SCR - B3F - General Comment</b>		
SCR - B3F- cell A1		
SCR - B3F- cell A2-A6		
SCR - B3F- cell A7		
SCR - B3F- cell B1		
SCR - B3F- cell B2-B6		
SCR - B3F- cell B7		
SCR - B3F- cell C1		
SCR - B3F- cell C2-C6		
SCR - B3F- cell C7		
SCR - B3F- cell A8		

SCR - B3F- cell B8		
SCR - B3F- cell C8		
SCR - B3F- cell A9		
SCR - B3F- cell A10-A15		
SCR - B3F- cell A16		
SCR - B3F- cell B9		
SCR - B3F- cell B10-B15		
SCR - B3F- cell B16		
SCR - B3F- cell C9		
SCR - B3F- cell C10-C15		
SCR - B3F- cell C16		
SCR - B3F- cell A17		
SCR - B3F- cell A18		
SCR - B3F- cell B17		
SCR - B3F- cell B18		
SCR - B3F- cell C17		
SCR - B3F- cell C18		
SCR - B3F- cell A19		
SCR - B3F- cell A20		
SCR - B3F- cell A21		
SCR - B3F- cell B19		
SCR - B3F- cell B20		
SCR - B3F- cell B21		
SCR - B3F- cell C19		
SCR - B3F- cell C20		
SCR - B3F- cell C21		
SCR - B3F- cell A22		
SCR - B3F- cell A23-A25		
SCR - B3F- cell A26		

SCR - B3F- cell B22		
SCR - B3F- cell B23-B25		
SCR - B3F- cell B26		
SCR - B3F- cell C22		
SCR - B3F- cell C23-C25		
SCR - B3F- cell C26		
SCR - B3F- cell AA1-AA20		
SCR - B3F- cell AA21		
SCR - B3F- cell AA22-AA35		
SCR - B3F- cell AA36		
SCR - B3F- cell AA37		
SCR - B3F- cell AB1-AB20		
SCR - B3F- cell AB21		
SCR - B3F- cell AB22-AB35		
SCR - B3F- cell AB36		
SCR - B3F- cell AB37		
SCR - B3F- cell AC1-AC20		
SCR - B3F- cell AC21		
SCR - B3F- cell AD1-AD20		
SCR - B3F- cell AD21		
SCR - B3F- cell AE1-AE20		
SCR - B3F- cell AF1-AF20		
SCR - B3F- cell AF21		
SCR - B3F- cell AF36		
SCR - B3F- cell AF37		
SCR - B3F- cell AF38		
SCR - B3F- cell AF39		

SCR - B3F- cell AG1-AG20		
SCR - B3F- cell AG21		
SCR - B3F- cell AG36		
SCR - B3F- cell AG37		
SCR - B3F- cell AH1-AH20		
SCR - B3F- cell AH21		
SCR - B3F- cell AH36		
SCR - B3F- cell AH37		
SCR - B3F- cell AI1-AI20		
SCR - B3F- cell AI21		
SCR - B3F- cell AI36		
SCR - B3F- cell AI37		
SCR - B3F- cell AI38		
SCR - B3F- cell AI39		
SCR - B3F- cell BA1-BA20		
SCR - B3F- cell BA21		
SCR - B3F- cell BA22-BA35		
SCR - B3F- cell BA36		
SCR - B3F- cell BA37		
SCR - B3F- cell BB1-BB20		
SCR - B3F- cell BB21		
SCR - B3F- cell BB22-BB35		
SCR - B3F- cell BB36		
SCR - B3F- cell BB37		
SCR - B3F- cell BC1-BC20		
SCR - B3F- cell BC21		
SCR - B3F- cell BD1-BD20		

SCR - B3F- cell BD21		
SCR - B3F- cell BE1-BE20		
SCR - B3F- cell BE21		
SCR - B3F- cell BE36		
SCR - B3F- cell BE37		
SCR - B3F- cell BE38		
SCR - B3F- cell BE39		
SCR - B3F- cell BF1-BF20		
SCR - B3F- cell BF21		
SCR - B3F- cell BF36		
SCR - B3F- cell BF37		
SCR - B3F- cell BG1-BG20		
SCR - B3F- cell BG21		
SCR - B3F- cell BG36		
SCR - B3F- cell BG37		
SCR - B3F- cell BH1-BH20		
SCR - B3F- cell BH21		
SCR - B3F- cell BH36		
SCR - B3F- cell BH37		
SCR - B3F- cell BH38		
SCR - B3F- cell BH39		
SCR - B3F- cell CA1-CA14		
SCR - B3F- cell CA15		
SCR - B3F- cell CA16-CA29		
SCR - B3F- cell CA30		
SCR - B3F- cell CA31		
SCR - B3F- cell CB1-CB14		
SCR - B3F- cell CB15		

SCR - B3F- cell CB16-CB29		
SCR - B3F- cell CB30		
SCR - B3F- cell CB31		
SCR - B3F- cell CC1-CC14		
SCR - B3F- cell CC15		
SCR - B3F- cell CD1-CD14		
SCR - B3F- cell CD15		
SCR - B3F- cell CE1-CE14		
SCR - B3F- cell CF1-CF14		
SCR - B3F- cell CF15		
SCR - B3F- cell CF30		
SCR - B3F- cell CF31		
SCR - B3F- cell CF32		
SCR - B3F- cell CF33		
SCR - B3F- cell CG1-CG14		
SCR - B3F- cell CG15		
SCR - B3F- cell CG30		
SCR - B3F- cell CG31		
SCR - B3F- cell CH1-CH14		
SCR - B3F- cell CH15		
SCR - B3F- cell CH30		
SCR - B3F- cell CH31		
SCR - B3F- cell CI1-CI14		
SCR - B3F- cell CI15		
SCR - B3F- cell CI30		
SCR - B3F- cell CI31		
SCR - B3F- cell CI32		
SCR - B3F- cell CI33		

SCR - B3F- cell DA1-DA9		
SCR - B3F- cell DA10		
SCR - B3F- cell DA11-DA24		
SCR - B3F- cell DA25		
SCR - B3F- cell DA26		
SCR - B3F- cell DB1-DB9		
SCR - B3F- cell DB10		
SCR - B3F- cell DB11-DB24		
SCR - B3F- cell DB25		
SCR - B3F- cell DB26		
SCR - B3F- cell DC1-DC9		
SCR - B3F- cell DC10		
SCR - B3F- cell DD1-DD9		
SCR - B3F- cell DD10		
SCR - B3F- cell DE1-DE9		
SCR - B3F- cell DF1-DF9		
SCR - B3F- cell DF10		
SCR - B3F- cell DF25		
SCR - B3F- cell DF26		
SCR - B3F- cell DF27		
SCR - B3F- cell DF28		
SCR - B3F- cell DG1-DG9		
SCR - B3F- cell DG10		
SCR - B3F- cell DG25		
SCR - B3F- cell DG26		
SCR - B3F- cell DH1-DH9		
SCR - B3F- cell DH10		



SCR - B3F- cell DH25		
SCR - B3F- cell DH26		
SCR - B3F- cell DI1-DI9		
SCR - B3F- cell DI10		
SCR - B3F- cell DI25		
SCR - B3F- cell DI26		
SCR - B3F- cell DI27		
SCR - B3F- cell DI28		
SCR - B3F- cell EA1		
SCR - B3F- cell EB1		
SCR - B3F- cell EC1		
SCR - B3F- cell ED1		
SCR - B3F- cell EE1		
SCR - B3F- cell EE2		
SCR - B3F- cell EE3		
SCR - B3F- cell EF1		
SCR - B3F- cell EG1		
SCR - B3F- cell EH1		
SCR - B3F- cell EH2		
SCR - B3F- cell EH3		
SCR - B3F- cell FA1		
SCR - B3F- cell FB1		
SCR - B3F- cell FC1		
SCR - B3F- cell FD1		
SCR - B3F- cell FE1		
SCR - B3F- cell GA1		
SCR - B3F- cell GA2		
SCR - B3F- cell GA3		
SCR - B3F- cell GA4		

SCR - B3F- cell GA5		
SCR - B3F- cell GA6		
SCR - B3F- cell HA1		
SCR - B3F- cell HB1		
SCR - B3F- cell HC1		
SCR - B3F- cell HD1		
SCR - B3F- cell HE1		
SCR - B3F- cell HF1		
SCR - B3F- cell HG1		
SCR - B3F- cell HH1		
SCR - B3F- cell HA2-HE2		
SCR - B3F- cell HF2		
SCR - B3F- cell HG2		
SCR - B3F- cell HH2		
SCR - B3F- cell HI2		
SCR - B3F- cell HJ2		
SCR - B3F- cell HA3		
SCR - B3F- cell HB3		
SCR - B3F- cell HC3		
SCR - B3F- cell HA4		
SCR - B3F- cell HB4		
SCR - B3F- cell HC4		
SCR - B3F- cell HA5		
SCR - B3F- cell HB5		
SCR - B3F- cell HC5		
SCR - B3F- cell IA1-IB1		
SCR - B3F- cell IC1		
SCR - B3F- cell ID1		
SCR - B3F- cell IE1		

SCR - B3F- cell IF1		
SCR - B3F- cell JA1		
SCR - B3F- cell JA2		
SCR - B3F- cell JA3		
SCR - B3F- cell JA4		
SCR - B3F- cell KA1-KE1		
SCR - B3F- cell KA2-KE2		
SCR - B3F- cell KA3-KE3		
SCR - B3F- cell KA4-KE4		
SCR - B3F- cell KA5-KE5		
SCR - B3F- cell KA6-KE6		
SCR - B3F- cell KA7-KE7		
SCR - B3F- cell KF1		
SCR - B3F- cell KF4		
SCR - B3F- cell KF5		
SCR - B3F- cell KF6		
SCR - B3F- cell KF7		
SCR - B3F- cell KA8		
SCR - B3F- cell KB8		
SCR - B3F- cell KC8		
SCR - B3F- cell KA9		
SCR - B3F- cell KB9		
SCR - B3F- cell KC9		
SCR - B3F- cell KA10		
SCR - B3F- cell KB10		
SCR - B3F- cell KC10		
SCR - B3F- cell LA1-LB1		
SCR - B3F- cell LC1		
SCR - B3F- cell LA2-LB2		

SCR - B3F- cell LC2		
SCR - B3F- cell LA3-LB3		
SCR - B3F- cell LC3		
SCR - B3F- cell LA4-LB4		
SCR - B3F- cell LC4		
SCR - B3F- cell LA5-LB5		
SCR - B3F- cell LC5		
SCR - B3F- cell LA6-LB6		
SCR - B3F- cell LC6		
SCR - B3F- cell LA7		
SCR - B3F- cell LA8		
SCR - B3F- cell LA9		
SCR - B3F- cell LA10		
SCR - B3F- cell LA11		
SCR - B3F- cell LA12		
SCR - B3F- cell LB12		
SCR - B3F- cell LC12		
SCR - B3F- cell LA13		
SCR - B3F- cell LB13		
SCR - B3F- cell LC13		
SCR - B3F- cell LA14		
SCR - B3F- cell LB14		
SCR - B3F- cell LC14		
SCR - B3F- cell MA1-ME1		
SCR - B3F- cell MA2-ME2		
SCR - B3F- cell MF2		
SCR - B3F- cell MG2		
SCR - B3F- cell MH2		
SCR - B3F- cell MF3		

SCR - B3F- cell MG3		
SCR - B3F- cell MH3		
SCR - B3F- cell MF4		
SCR - B3F- cell MG4		
SCR - B3F- cell MH4		
SCR - B3F- cell NA1,NC1,NE1,NG1,NI1		
SCR - B3F- cell NB1,ND1,NF1,NH1,NJ1		
SCR - B3F- cell NK1		
SCR - B3F- cell NK32		
SCR - B3F- cell NK33		
SCR - B3F- cell NK34		
SCR - B3F- cell NL1		
SCR - B3F- cell NL32		
SCR - B3F- cell NM1		
SCR - B3F- cell NM32		
SCR - B3F- cell NN1		
SCR - B3F- cell NN32		
SCR - B3F- cell NN33		
SCR - B3F- cell NN34		
SCR - B3F- cell OA1		
SCR - B3F- cell OB1,OC1,OD1,OE1,OF1		
SCR - B3F- cell OG1		
SCR - B3F- cell OG21		
SCR - B3F- cell OG22		
SCR - B3F- cell OG23		
SCR - B3F- cell OH1		
SCR - B3F- cell OH21		

SCR - B3F- cell OI1		
SCR - B3F- cell OI21		
SCR - B3F- cell OJ1		
SCR - B3F- cell OJ21		
SCR - B3F- cell OJ22		
SCR - B3F- cell OJ23		
SCR - B3F- cell PA21		
SCR - B3F- cell PB21		
SCR - B3F- cell PC1		
SCR - B3F- cell PD1,PF1,PH1		
SCR - B3F- cell PE1, PG1, PI1		
SCR - B3F- cell PJ1		
SCR - B3F- cell PJ21		
SCR - B3F- cell PK21		
SCR - B3F- cell PL21		
SCR - B3F- cell PM21		
<b>SCR - B3G - General Comments</b>		
SCR - B3G- cell A30		
SCR - B3G- cell A1		
SCR - B3G- cell A2		
SCR - B3G- cell A3		
SCR - B3G- cell A4		
SCR - B3G- cell A5		
SCR - B3G- cell A6		
SCR - B3G- cell A7		
SCR - B3G- cell A8		
SCR - B3G- cell A9		

SCR - B3G- cell A10		
SCR - B3G- cell A11		
SCR - B3G- cell A12		
SCR - B3G- cell A13		
SCR - B3G- cell A14		
SCR - B3G- cell A15		
SCR - B3G- cell A16		
<b>MCR - B4A - General Comments</b>		
MCR - B4A- cell A1		
MCR - B4A- cell B2		
MCR - B4A- cell C2		
MCR - B4A- cell B3		
MCR - B4A- cell C3		
MCR - B4A- cell B4		
MCR - B4A- cell C4		
MCR - B4A- cell B5		
MCR - B4A- cell C5		
MCR - B4A- cell B6		
MCR - B4A- cell C6		
MCR - B4A- cell B7		
MCR - B4A- cell C7		
MCR - B4A- cell B8		
MCR - B4A- cell C8		
MCR - B4A- cell B9		
MCR - B4A- cell C9		
MCR - B4A- cell B10		
MCR - B4A- cell C10		
MCR - B4A- cell B11		

MCR - B4A- cell C11		
MCR - B4A- cell B12		
MCR - B4A- cell C12		
MCR - B4A- cell B13		
MCR - B4A- cell C13		
MCR - B4A- cell B14		
MCR - B4A- cell C14		
MCR - B4A- cell B15		
MCR - B4A- cell C15		
MCR - B4A- cell B16		
MCR - B4A- cell C16		
MCR - B4A- cell B17		
MCR - B4A- cell C17		
MCR - B4A- cell A18		
MCR - B4A- cell B19		
MCR - B4A- cell B20		
MCR - B4A- cell B21		
MCR - B4A- cell B22		
MCR - B4A- cell C23		
MCR - B4A- cell A24		
MCR - B4A- cell A25		
MCR - B4A- cell A26		
MCR - B4A- cell A27		
MCR - B4A- cell A28		
MCR - B4A- cell A29		
MCR - B4A- cell A30		
<b>MCR - B4B - General Comments</b>		
MCR - B4B- cell B1		



MCR - B4B- cell C1		
MCR - B4B- cell D2		
MCR - B4B- cell E2		
MCR - B4B- cell F2		
MCR - B4B- cell G2		
MCR - B4B- cell D3		
MCR - B4B- cell E3		
MCR - B4B- cell F3		
MCR - B4B- cell G3		
MCR - B4B- cell D4		
MCR - B4B- cell E4		
MCR - B4B- cell F4		
MCR - B4B- cell G4		
MCR - B4B- cell D5		
MCR - B4B- cell E5		
MCR - B4B- cell F5		
MCR - B4B- cell G5		
MCR - B4B- cell D6		
MCR - B4B- cell E6		
MCR - B4B- cell F6		
MCR - B4B- cell G6		
MCR - B4B- cell D7		
MCR - B4B- cell E7		
MCR - B4B- cell F7		
MCR - B4B- cell G7		
MCR - B4B- cell D8		
MCR - B4B- cell E8		
MCR - B4B- cell F8		
MCR - B4B- cell G8		

MCR - B4B- cell D9		
MCR - B4B- cell E9		
MCR - B4B- cell F9		
MCR - B4B- cell G9		
MCR - B4B- cell D10		
MCR - B4B- cell E10		
MCR - B4B- cell F10		
MCR - B4B- cell G10		
MCR - B4B- cell D11		
MCR - B4B- cell E11		
MCR - B4B- cell F11		
MCR - B4B- cell G11		
MCR - B4B- cell D12		
MCR - B4B- cell E12		
MCR - B4B- cell F12		
MCR - B4B- cell G12		
MCR - B4B- cell D13		
MCR - B4B- cell E13		
MCR - B4B- cell F13		
MCR - B4B- cell G13		
MCR - B4B- cell D14		
MCR - B4B- cell E14		
MCR - B4B- cell F14		
MCR - B4B- cell G14		
MCR - B4B- cell D15		
MCR - B4B- cell E15		
MCR - B4B- cell F15		
MCR - B4B- cell G15		
MCR - B4B- cell D16		

MCR - B4B- cell E16		
MCR - B4B- cell F16		
MCR - B4B- cell G16		
MCR - B4B- cell D17		
MCR - B4B- cell E17		
MCR - B4B- cell F17		
MCR - B4B- cell G17		
MCR - B4B- cell B18		
MCR - B4B- cell C18		
MCR - B4B- cell D19		
MCR - B4B- cell F19		
MCR - B4B- cell D20		
MCR - B4B- cell F20		
MCR - B4B- cell D21		
MCR - B4B- cell F21		
MCR - B4B- cell D22		
MCR - B4B- cell F22		
MCR - B4B- cell E23		
MCR - B4B- cell G23		
MCR - B4B- cell A24		
MCR - B4B- cell A25		
MCR - B4B- cell A26		
MCR - B4B- cell A27		
MCR - B4B- cell A28		
MCR - B4B- cell A29		
MCR - B4B- cell A30		
<b>G01-General Comments</b>		
G01- cell A1		
G01- cell B1		

G01- cell C1		
G01- cell D1		
G01- cell E1		
G01- cell F1		
G01- cell G1		
G01- cell H1a		
G01- cell H1b		
G01- cell H1c		
G01- cell I1a		
G01- cell I1b		
G01- cell J1		
G01- cell K1		
G01- cell L1		
G01- cell M1		
G01- cell N1		
G01- cell O1		
G01- cell P1		
G01- cell Q1		
G01- cell R1		
G01- cell S1		
G01- cell T1		
G01- cell U1		
<b>G03 – General Comments</b>		
G03- cell A1		
G03- cell A2		
G03- cell B1		
G03- cell B2		
G03- cell B3		

G03- cell B4		
G03- cell B5		
G03- cell B6		
G03- cell B7		
G03- cell C1		
G03- cell D1		
G03- cell F1		
G03- cell G1		
G03- cell H1		
G03- cell N1		
G03- cell O1		
G03- cell P1		
<b>G04 – General Comments</b>		
G04- cell A1		
G04- cell A2		
G04- cell A3		
G04- cell B1		
G04- cell C1		
G04- cell D1		
G04- cell E1		
<b>G14- General Comments</b>		
G14- cell A1		
G14- cell B1		
G14- cell S1		
G14- cell C1,F1,I1,L1,O1		
G14- cell D1,G1,J1,M1,P1		
G14- cell E1,H1,K1,N1,Q1		

G14- cell R1		
<b>Technical Annex IV General Comments</b>		
<b>Technical Annex V General Comments</b>		
<b>Technical Annex VI General Comments</b>		
<b>Technical Annex VII General Comments</b>		
CAS1		
CAS2		
CAS3		
CAS4		
CAS5		
CAS6		
CAS7		
CAS8		
CAS9		
CAS10		
CAS11		
CAS12		
CAS13		
CAS14		
CAS15		
CAS16		
CAS17		
CAS18		
CAS19		
CAS20		
CAS21		

CAS22		
CAS23		
CAS24		
CAS25		
CAS26		
CAS27		
CAS28		
CAS29		
CAS30		
CAS31		
CAS32		
CAS33		
CAS34		
CAS35		
CAS36		
CAS37		
CAS38		
CAS39		
CAS40		
CAS41		
CAS42		
CAS43		
CAS44		
CAS45		
CAS46		
CAS47		
CAS48		
CAS49		
CAS50		

CAS51		
CAS52		
CAS53		
CAS54		
CAS55		
CAS56		
CAS57		
CAS58		
CAS59		
CAS60		
CAS61		
CAS62		
CAS63		
CAS64		
CAS65		
CAS66		
CAS67		
CAS68		
CAS69		
CAS70		
CAS71		
CAS72		
CAS73		
CAS74		
CAS75		
CAS76		
CAS77		
CAS78		
CQS1		



CQS2		
CQS3		
CQS4		
CQS5		
CQS6		
CQS7		
CQS8		
CQS9		
CQS10		
CQS11		
CQS12		
CQS13		
CQS14		
CQS15		
CQS16		
CQS17		
CQS18		
CQS19		
CQS20		
CQS21		
CQS22		
CQS23		
CQS24		
CQS25		
CQS26		
CQS27		
CQS28		
CQS29		
CQS30		

CQS31		
CQS32		
CQS33		
CQS34		
CQS35		
CQS36		
CQS37		
CQS38		
CQS39		
CQS40		
CQS41		
CQS42		
CQS43		
CQS44		
CQS45		
CQS46		
CQS47		
CQS48		
CQS49		
CQS50		
CQS51		
CQS52		
CQS53		
CQS54		
CQS55		
CQS56		
CQS57		
CQS58		
CQS59		

CQS60		
CQS61		
CQS62		
CQS63		
CGS1		
CGS2		
CGS3		
CGS4		
CGS5		
CGS6		
CGS7		
CGS8		
CGS9		
CGS10		
CGS11		
CGS12		
CGS13		
CGS14		
CGS15		
CGS16		
CGS17		
CGS18		
CGS19		
CGS20		
CGS21		
QCGS1		
Instructions		
<b>Impact Assessment - General Coments</b>		

2,1		
2,2		
2,3		
2,4		
2,5		
2,6		
2,7		
2,8		
2,9		
2.10		
2,11		
2,12		
2,13		
2,14		
2,15		
2,16		
Question 1		
Question 1 - Option 1		
Question 1 - Option 2		
Question 2		
Question 2 - Option 1		
Question 2 - Option 2		
Question 2 - Option 3		
Question 2 - Option 4		
Question 3		
Question 3 - Option 1		
Question 3 - Option 2		
Question 3 - Option 3		
Question 4		

Question 4 - Option 1		
Question 4 - Option 2		
Question 4 - Option 3		
Question 4 - Option 4		
Question 4 - Option 5		
Question 5		
Question 5 - Option 1		
Question 5 - Option 2		
Question 6		
Question 6 - Option 1		
Question 6 - Option 2		
Question 6 - Option 3		
Question 6 - Option 4		
Question 7		
Question 7 - Option 1		
Question 7 - Option 2		
Question 7 - Option 3		
2,17		
2,18		
2,19		
2.20		
2,21		
2,22		
2,23		
2,24		
2,25		
2,26		
2,27		
2,28		

2,29		
2.30		
2,31		
2,32		
2,33		
2,34		
2,35		
2,36		
2,37		
2,38		
2,39		
2.40		
2,41		
2,42		
2,43		
2,44		
2,45		
2,46		
2,47		
2,48		
2,49		
2.50		
2,51		
2,52		
2,53		
2,54		
2,55		
2,56		
2,57		

2,58		
2,59		
2.60		
2,61		
2,62		
2,63		
2,64		
2,65		
2,66		
2,67		
2,68		
2,69		
2.70		
2,71		
2,72		
2,73		
2,74		
2,75		
2,76		
2,77		
2,78		
2,79		
2.80		
Appendix 1		
Appendix 2		
Appendix 3		