

**Comments Template on
Draft proposal for Level 3 on Quantitative Reporting Templates**

**Deadline
18.03.2011
12:00 CET**

Name of Company:	Groupe consultatif actuariel européen	
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"> ⇒ Do not change the numbering in the column "reference". ⇒ Leave the last column <u>empty</u>. ⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph or a cell, keep the row <u>empty</u>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific paragraph numbers below. <ul style="list-style-type: none"> ○ If your comment refers to multiple 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. ○ If your comment refers to sub bullets/subparagraphs, please indicate this in the comment itself. <p>Please send the completed template, <u>in Word Format</u>, to iwona.krasniewska@eiopa.europa.eu. 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 <u>accompanying spreadsheets and LOGs</u>, the reference to "General", "Purpose", etc. refers to <u>summary documents</u>.</p>		
Reference	Comment	
General Comment	<p>A. LINES OF BUSINESS</p> <p>1. There is considerable inconsistency between the LOBs required across QRTs. This is detailed in the excel file below. For example:</p> <ul style="list-style-type: none"> - Some QRTs require "health" to be at a lower level of granularity than the 	

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categories "participating", "unit linked" etc whilst other QRTs have "health" as an additional category at the same level of granularity as "participating", "unit linked" etc

- Some QRTs ask for extra granularity beyond that specified in draft IMs (eg discretionary / non discretionary, with / without guarantees)
- The QRT "Country - K1" introduces a totally separate set of LOBs to other QRTs
- "MCR - B4A" seems to have "reinsurance" excluded as a separate LOB and bundled with the other 3 LOBs

2. The need to have different levels of granularity for different QRTs is going to add significantly to the workload required to produce the QRTs. The reason for this is that it will require data to be collected at a different level for each QRT.

It is recommended that only a high level allocation into first level LOBs is required. In particular, that the only 4 categories are "participating", "unit linked", "reinsurance" and "other life". This would enable firms to continue producing figures at the level of LOB that they run their business, and easily map their individual lines of business into standardised LOBs for the purposes of the QRTs.

B. QUATERLY REPORTING

1. Usually statutory reporting is only produced on an annual basis. It means that quarterly communications for supervisors will not rely on data which entered an audited accounting process and which entered a full balance sheet approach with a decision of the ASMB.
2. The periods allowed for the production of the template are shorter than for the annual templates. Solvency 2 calculations need somehow stochastic calculations, for which we need more times to produce the numbers.
3. Expectations about the diligence for quarterly should be lower because of 1 and 2
4. Therefore guidelines should be produced to limit the expectations of the supervisor. These guidelines could say :

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- that the quarterly reporting doesn't go the ASMB body
- that proxies may be used and that calculations may be based, for some assumptions and some data on the previous annual inventory.
- 5. It would also help to avoid highlighting the differences between quarterly 4 and annual reporting due to a too short time of production.
- 6. Therefore, disclosing quarterly templates doesn't seem accurate.

1.1

1.2

1.3

1.4

1.5

2.1

2.2

2.3

2.4

2.5

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3.1		
3.2		
3.3		
3.4		
3.5		
3.6		
3.7		
3.8		
Q1		
Q2		
Q3		
Q4		
Q5		
Q6		
Technical Annex (only for inconsistencies)		
BS-C1 – General	<p>We recommend changing the frequency from quarterly to annually. Each quarter, OF - B1Q report should be sufficient to measure the eligible own funds without having to produce a full S2 balance sheet. Otherwise it would be too burdensome for insurance companies and with little value added for the supervisors and the public</p> <p>Precisions needed : At group level, it should be prescribed that the balance sheet covers only entities treated with the Consolidation methodology, i.e. exclude entities treated with the D&A</p>	

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	<p>methodology and OFS / NCP entities. Investment funds (A9): it should be prescribed that a look-through approach is not expected for balance sheet reporting. Statutory accounts: it should be prescribed that:</p> <ul style="list-style-type: none"> - For solo reporting, the local GAAP are expected - For Group reporting, the accounting standard of the Group undertakings (IFRS sometimes) are expected <p>We propose the following merge of cells: Derivatives (merging A10A and L16) ; Cash and debts owed to credit institutions (merging A27 and L19) ; Deferred taxes (merging A26 and L17). We also recommend not to disclose own shares and minority interests in BS - C1 report but rather in OF - B1 report, which seems more appropriate</p> <p>The codification from local GAAP accounts to Solvency II accounts should be prescribed to improve comparability.</p>	
BS-C1 – Purpose		
BS-C1 – Benefits		
BS-C1 – Costs		
BS-C1 – Groups		
BS-C1 – Materiality		
BS-C1 - Disclosure		
BS-C1 – Frequency		
BS-C1 – Open issues		
BS-C1- cell AS24		
BS-C1- cell A2		
BS-C1- cell AS2		

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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		
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 A9	Investment funds: it should be prescribed that a look-through approach is not expected for balance sheet reporting.	
BS-C1- cell AS9		
BS-C1- cell A10A		

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BS-C1- cell AS10A		
BS-C1- cell A10B		
BS-C1- cell AS10B		
BS-C1- cell A14		
BS-C1- cell AS14		
BS-C1- cell A11		
BS-C1- cell AS11		
BS-C1- cell A12		
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		

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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		
BS-C1- cell L11		

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BS-C1- cell L12		
BS-C1- cell L23		
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		
BS-C1- cell LS19		
BS-C1- cell L20		
BS-C1- cell LS20		
BS-C1- cell L15A		
BS-C1- cell LS15A		
BS-C1- cell L15B		
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		

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BS-C1- cell L26		
BS-C1- cell LS26		
BS-C1- cell L27A		
BS-C1- cell LS27A		
BS-C1- cell L28		
BS-C1- cell LS28		
BS-C1B – General	<p>The scope of this template should be prescribed: the elements to be disclosed are the off-balance sheet items of which balance sheet?</p> <ul style="list-style-type: none"> - Statutory accounts - IFRS or other Group standard audited accounts - Solvency II accounts <p>In a Solvency II referential, it could be logical that only items off the Solvency II balance sheet would be referenced here.</p>	
BS-C1B – Purpose		
BS-C1B – Benefits		
BS-C1B – Costs		
BS-C1B – Groups		
BS-C1B – Materiality		
BS-C1B - Disclosure		
BS-C1B – Frequency	We recommend changing from quarterly to annually (as BS C1).	
BS-C1B – Open issues		
BS-C1B- cell A2		
BS-C1B- cell A3A		
BS-C1B- cell A3C		

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BS-C1B- cell B3C		
BS-C1B- cell C3C		
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		
BS-C1B- cell A5		
BS-C1B- cell A9A		
BS-C1B- cell A9B		
BS-C1B- cell B9B		
BS-C1B- cell C9B		

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BS-C1B- cell A19		
BS-C1B- cell B19		
BS-C1D – General		
BS-C1D – Purpose		
BS-C1D – Benefits		
BS-C1D – Costs		
BS-C1D – Groups		
BS-C1D – Materiality		
BS-C1D - Disclosure		
BS-C1D – Frequency		
BS-C1D – Open issues		
BS-C1D- cell A1		
BS-C1D- cell B1		
BS-C1D- cell C1		
BS-C1D- cell D1		
BS-C1D- cell E1		
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 A8		
BS-C1D- cell A9		

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BS-C1D- cell A10		
BS-C1D- cell A11		
BS-C1D- cell A12		
BS-C1D- cell A13		
BS-C1D- cell A14		
BS-C1D- cell A16		
BS-C1D- cell B16		
OF - B1A & B1Q – General	The template is adapted for solo reporting; however, it needs improvements for group reporting (treatment of non transferability of eligible own funds, treatment of participations)	
OF - B1A & B1Q – Purpose		
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 & B1Q – Open issues		
OF - B1A- cell B1		
OF - B1A- cell C1		
OF - B1A- cell B2		
OF - B1A- cell C2		
OF - B1A- cell B3		

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OF - B1A- cell C3		
OF - B1A- cell D3		
OF - B1A- cell B4		
OF - B1A- cell B6		
OF - B1A- cell B8		
OF - B1A- cell B9		
OF - B1A- cell C9		
OF - B1A- cell D9		
OF - B1A- cell B10		
OF - B1A- cell C10		
OF - B1A- cell D10		
OF - B1A- cell B11		
OF - B1A- cell C11		
OF - B1A- cell D11		
OF - B1A- cell B12		
OF - B1A- cell C12		
OF - B1A- cell D12		
OF - B1A- cell B12A		
OF - B1A- cell C12A		
OF - B1A- cell D12A		
OF - B1A- cell B5A		
OF - B1A- cell B14		
OF - B1A- cell B15		
OF - B1A- cell B16		
OF - B1A- cell B17		
OF - B1A- cell C17		

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OF - B1A- cell B18		
OF - B1A- cell D18		
OF - B1A- cell C22		
OF - B1A- cell C23		
OF - B1A- cell C24		
OF - B1A- cell D24		
OF - B1A- cell C25		
OF - B1A- cell D25		
OF - B1A- cell C26		
OF - B1A- cell C27		
OF - B1A- cell D27		
OF - B1A- cell C28		
OF - B1A- cell C29		
OF - B1A- cell D29		
OF - B1A- cell C30		
OF - B1A- cell D30		
OF - B1A- cell B33		
OF - B1A- cell C33		
OF - B1A- cell D33		
OF - B1A- cell B33A		
OF - B1A- cell C33A		
OF - B1A- cell B34		
OF - B1A- cell B37		
OF - B1A- cell B39		
OF - B1A- cell B43		
OF - B1A- cell B44		

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OF - B1A- cell C44		
OF - B1A- cell D44		
OF - B1A- cell A46.1		
OF - B1A- cell B46.1		
OF - B1A- cell A46.n		
OF - B1A- cell B46.n		
OF - B1A- cell A47.1		
OF - B1A- cell B47.1		
OF - B1A- cell A47.n		
OF - B1A- cell B47.n		
OF - B1A- cell B53		
OF - B1A- cell B53A		
OF - B1A- cell C53		
OF - B1A- cell C53A		
OF - B1A- cell D53		
OF - B1A- cell B54		
OF - B1A- cell B54A		
OF - B1A- cell C54		
OF - B1A- cell C54A		
OF - B1A- cell D54		
OF - B1A- cell B55		
OF - B1A- cell B55A		
OF - B1A- cell C55		
OF - B1A- cell C55A		
OF - B1A- cell D55		
OF - B1A- cell A64		

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OF - B1A- cell B64		
OF - B1A- cell C64		
OF - B1A- cell D64		
OF - B1A- cell E64		
OF - B1A- cell F64		
OF - B1A- cell A65		
OF - B1A- cell B65		
OF - B1A- cell C65		
OF - B1A- cell D65		
OF - B1A- cell E65		
OF - B1A- cell F65		
OF - B1A- cell A65A		
OF - B1A- cell B65A		
OF - B1A- cell C65A		
OF - B1A- cell D65A		
OF - B1A- cell E65A		
OF - B1A- cell F65A		
OF - B1A- cell A67.1		
OF - B1A- cell B67.1		
OF - B1A- cell C67.1		
OF - B1A- cell C67A.1		
OF - B1A- cell C67B.1		
OF - B1A- cell D67.1		
OF - B1A- cell E67.1		
OF - B1A- cell F67.1		
OF - B1A- cell F67A.1		

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OF - B1A- cell F67B.1		
OF - B1A- cell G67.1		
OF - B1A- cell A67.n		
OF - B1A- cell B67.n		
OF - B1A- cell C67.n		
OF - B1A- cell C67A.n		
OF - B1A- cell C67B.n		
OF - B1A- cell D67.n		
OF - B1A- cell E67.n		
OF - B1A- cell F67.n		
OF - B1A- cell F67A.n		
OF - B1A- cell F67B.n		
OF - B1A- cell G67.n		
OF - B1A- cell A72.1		
OF - B1A- cell B72.1		
OF - B1A- cell C72.1		
OF - B1A- cell D72.1		
OF - B1A- cell E72.1		
OF - B1A- cell F72.1		
OF - B1A- cell G72.1		
OF - B1A- cell H72.1		
OF - B1A- cell A72.n		
OF - B1A- cell B72.n		
OF - B1A- cell C72.n		
OF - B1A- cell D72.n		
OF - B1A- cell E72.n		

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OF - B1A- cell F72.n		
OF - B1A- cell G72.n		
OF - B1A- cell H72.n		
OF - B1A- cell A73A		
OF - B1A- cell B73A		
OF - B1A- cell C73A		
OF - B1A- cell D73A		
OF - B1A- cell B73B		
OF - B1A- cell D73B		
OF - B1A- cell C74		
OF - B1A- cell D74		
OF - B1A- cell C75		
OF - B1A- cell D75		
OF - B1A- cell C75A		
OF - B1A- cell D75A		
OF - B1A- cell A77.1		
OF - B1A- cell B77.1		
OF - B1A- cell C77.1		
OF - B1A- cell D77.1		
OF - B1A- cell A77.n		
OF - B1A- cell B77.n		
OF - B1A- cell C77.n		
OF - B1A- cell D77.n		
OF - B1A- cell A79		
OF - B1A- cell A80		
OF - B1A- cell A81		

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OF - B1A- cell A82		
OF - B1A- cell A83		
OF - B1A- cell A84		
OF - B1A- cell A85		
OF - B1A- cell A86		
OF - B1A- cell A87		
OF - B1A- cell A90.1		
OF - B1A- cell B90.1		
OF - B1A- cell D90.1		
OF - B1A- cell E90.1		
OF - B1A- cell A90.n		
OF - B1A- cell B90.n		
OF - B1A- cell D90.n		
OF - B1A- cell E90.n		
OF - B1A- cell B91		
OF - B1A- cell D91		
OF - B1A- cell E91		
OF - B1A- cell F91		
OF - B1Q- cell B1		
OF - B1Q- cell C1		
OF - B1Q- cell B2		
OF - B1Q- cell C2		
OF - B1Q- cell B3		
OF - B1Q- cell C3		
OF - B1Q- cell D3		
OF - B1Q- cell B4		

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OF - B1Q- cell B6		
OF - B1Q- cell B8		
OF - B1Q- cell B9		
OF - B1Q- cell C9		
OF - B1Q- cell D9		
OF - B1Q- cell B10		
OF - B1Q- cell C10		
OF - B1Q- cell D10		
OF - B1Q- cell B11		
OF - B1Q- cell C11		
OF - B1Q- cell D11		
OF - B1Q- cell B12		
OF - B1Q- cell C12		
OF - B1Q- cell D12		
OF - B1Q- cell B12A		
OF - B1Q- cell C12A		
OF - B1Q- cell D12A		
OF - B1Q- cell B5A		
OF - B1Q- cell B14		
OF - B1Q- cell B15		
OF - B1Q- cell B16		
OF - B1Q- cell B17		
OF - B1Q- cell C17		
OF - B1Q- cell B18		
OF - B1Q- cell D18		
OF - B1Q- cell C22		

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OF - B1Q- cell C23		
OF - B1Q- cell C24		
OF - B1Q- cell D24		
OF - B1Q- cell C25		
OF - B1Q- cell D25		
OF - B1Q- cell C26		
OF - B1Q- cell C27		
OF - B1Q- cell D27		
OF - B1Q- cell C28		
OF - B1Q- cell C29		
OF - B1Q- cell D29		
OF - B1Q- cell C30		
OF - B1Q- cell D30		
OF - B1Q- cell B32A		
OF - B1Q- cell C32A		
OF - B1Q- cell B33		
OF - B1Q- cell C33		
OF - B1Q- cell D33		
OF - B1Q- cell B33A		
OF - B1Q- cell C33A		
SCR - B2A – General	This template may not be adapted for companies using an approved partial internal model. It will depend on the scope of the partial internal model and the way results of the internal models are aggregated in the BSCR calculation. For example, in the case where internal model results are aggregated at the level of sub modules, the required template would not fit with the way the undertaking's BSCR is calculated. This template should not constraint undertaking in the way they aggregate their calculations. We see 2 possibilities :	

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	<ul style="list-style-type: none"> - if EIOPA agrees that this template is only a presentation tool disconnected from the aggregation mechanism, then it should be possible to fill it, using a proxy for allocating diversification benefits between standard formula and internal model; - If EIOPA wants that the template fits the way the internal model is aggregated, then the template should be discussed and adapted manually for each company. <p>Gross and net evaluation of counterparty default risk module should be reported (i.e. B2 <> A2)</p> <p>Loss absorbing capacity of TP: The formula may not be adapted for companies who have several funds. The formula of the loss absorbing capacity (cell A11) should be left empty, to leave each company complete it, taking into account its own structure (i.e. evaluation of the loss absorbing capacity at portfolio level).</p> <p>The line Adjustment for RFF should be ranked before internal model elements, as :</p> <ul style="list-style-type: none"> - SCR from RFF is part of the undertaking's BSCR - RFF could be included in a partial internal model. 	
SCR - B2A – Purpose		
SCR - B2A – Benefits		
SCR - B2A – Costs		
SCR - B2A – Groups		
SCR - B2A – Materiality		
SCR - B2A - Disclosure	This template should be disclosed annually.	
SCR - B2A – Frequency	In case of quarterly reporting (which is not required by level 1 regulation), the costs of implementation should be taken into account, and proxies / simplification must be accepted.	

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SCR - B2A – Open issues		
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		
SCR - B2A - cell B4		
SCR - B2A - cell A5		
SCR - B2A - cell B5		
SCR - B2A - cell A6		
SCR - B2A - cell B6		
SCR - B2A - cell A7		
SCR - B2A - cell B7		
SCR - B2A - cell A8		
SCR - B2A - cell B8		
SCR - B2A - cell A9		
SCR - B2A - cell B9		
SCR - B2A - cell A10		
SCR - B2A - cell B10		
SCR - B2A - cell A11	Loss absorbing capacity of TP: The formula may not be adapted for companies who have several funds. The loss absorbing capacity should be left empty, to leave each company complete it, taking into account its own structure (i.e. evaluation of the loss absorbing capacity at portfolio level).	
SCR - B2A - cell A12		

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SCR - B2A - cell A13		
SCR - B2A - cell A14		
SCR - B2A - cell A15		
SCR - B2A - cell A16		
SCR - B2A - cell A17		
SCR - B2A - cell A18		
SCR - B2A - cell A19		
SCR - B2A - cell A20		
SCR - B2B – General		
SCR - B2B – Purpose		
SCR - B2B – Benefits		
SCR - B2B – Costs		
SCR - B2B – Groups		
SCR - B2B – Materiality		
SCR - B2B - Disclosure	This template should be disclosed annually.	
SCR - B2B – Frequency	In case of quarterly reporting (which is not required by level 1 regulation), the costs of implementation should be taken into account, and proxies / simplification must be accepted	
SCR - B2B – Open issues		
SCR - B2B- cell A1.1	The detail of cells A1.1....A1.n should be prescribed by each company taking into account the structure of its partial internal model	
SCR - B2B- cell A1A.1		
SCR - B2B- cell B1.1		
SCR - B2B- cell A1.n		

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SCR - B2B- cell A1A.n		
SCR - B2B- cell B1.n		
SCR - B2B- cell B3		
SCR - B2C – General		
SCR - B2C – Purpose		
SCR - B2C – Benefits		
SCR - B2C – Costs		
SCR - B2C – Groups		
SCR - B2C – Materiality		
SCR - B2C- Disclosure	This template should be disclosed annually.	
SCR - B2C – Frequency	In case of quarterly reporting (which is not required by level 1 regulation), the costs of implementation should be taken into account, and proxies / simplification must be accepted.	
SCR - B2C– Open issues		
SCR - B2C- cell A1.1	The detail of cells A1.1....A1.n should be prescribed by each company taking into account the structure of its partial internal model	
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 B3A		
SCR - B2C- cell B5		

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SCR - B2C- cell B6		
SCR - B2C- cell B8		
SCR - B2C- cell B10		
SCR - B3A – General	The treatment of ringed fenced funds should be prescribed: are they included in this template?	
SCR - B3A – Purpose		
SCR - B3A – Benefits		
SCR - B3A – Costs		
SCR - B3A – Groups		
SCR - B3A – Materiality		
SCR - B3A - Disclosure		
SCR - B3A – Frequency		
SCR - B3A – Open issues		
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		

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SCR - B3A- cell B2		
SCR - B3A- cell B2A		
SCR - B3A- cell C2		
SCR - B3A- cell B2B		
SCR - B3A- cell D2		
SCR - B3A- cell A3		
SCR - B3A- cell A3A		
SCR - B3A- cell B3		
SCR - B3A- cell B3A		
SCR - B3A- cell C3		
SCR - B3A- cell B3B		
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 A7A		
SCR - B3A- cell B7		

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SCR - B3A- cell B7A		
SCR - B3A- cell C7		
SCR - B3A- cell B7B		
SCR - B3A- cell D7		
SCR - B3A- cell A8		
SCR - B3A- cell B8		
SCR - B3A- cell A9		
SCR - B3A- cell B9		
SCR - B3A- cell A10		
SCR - B3A- cell A10A		
SCR - B3A- cell B10		
SCR - B3A- cell B10A		
SCR - B3A- cell C10		
SCR - B3A- cell B10B		
SCR - B3A- cell D10		
SCR - B3A- cell A11		
SCR - B3A- cell A11A		
SCR - B3A- cell B11		
SCR - B3A- cell B11A		
SCR - B3A- cell C11		
SCR - B3A- cell B11B		
SCR - B3A- cell D11		
SCR - B3A- cell A12		
SCR - B3A- cell A12A		
SCR - B3A- cell B12		
SCR - B3A- cell B12A		

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SCR - B3A- cell C12		
SCR - B3A- cell B12B		
SCR - B3A- cell D12		
SCR - B3A- cell A13		
SCR - B3A- cell A13A		
SCR - B3A- cell B13		
SCR - B3A- cell B13A		
SCR - B3A- cell C13		
SCR - B3A- cell B13B		
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 B15		
SCR - B3A- cell B15A		
SCR - B3A- cell C15		
SCR - B3A- cell B15B		
SCR - B3A- cell D15		
SCR - B3A- cell B16		
SCR - B3A- cell B16A		
SCR - B3A- cell C16		
SCR - B3A- cell B16B		

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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 B18		
SCR - B3A- cell B18A		
SCR - B3A- cell C18		
SCR - B3A- cell B18B		
SCR - B3A- cell D18		
SCR - B3A- cell B19		
SCR - B3A- cell B19A		
SCR - B3A- cell C19		
SCR - B3A- cell B19B		
SCR - B3A- cell D19		
SCR - B3A- cell C20		
SCR - B3A- cell D20		
SCR - B3A- cell A21		
SCR - B3A- cell A21A		
SCR - B3A- cell B21		
SCR - B3A- cell B21A		
SCR - B3A- cell C21		
SCR - B3A- cell B21B		

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SCR - B3A- cell D21		
SCR - B3A- cell A22		
SCR - B3A- cell A22A		
SCR - B3A- cell B22		
SCR - B3A- cell B22A		
SCR - B3A- cell C22		
SCR - B3A- cell B22B		
SCR - B3A- cell D22		
SCR - B3A- cell C23		
SCR - B3A- cell D23		
SCR - B3A- cell C24		
SCR - B3A- cell D24		
SCR - B3B – General	It should be prescribed that the requested amounts are net of loss absorbing capacity of technical provisions.	
SCR - B3B – Purpose		
SCR - B3B – Benefits		
SCR - B3B – Costs		
SCR - B3B – Groups		
SCR - B3B – Materiality		
SCR - B3B - Disclosure		
SCR - B3B – Frequency		
SCR - B3B – Open issues		
SCR - B3B- cell A0		
SCR - B3B- cell A1		

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SCR - B3B- cell A1A		
SCR - B3B- cell A2		
SCR - B3B- cell A3		
SCR - B3B- cell A4		
SCR - B3B- cell A6		
SCR - B3B- cell A7		
SCR - B3B- cell A8		
SCR - B3B- cell A8A		
SCR - B3B- cell A9		
SCR - B3C – General	Splitting assets and liabilities according to the sub-risk drivers would not be possible in most cases. This template should only provide the split of capital requirement calculation per sub-risk drivers (this means that we should only keep columns C and D).	
SCR - B3C – Purpose		
SCR - B3C – Benefits		
SCR - B3C – Costs		
SCR - B3C – Groups		
SCR - B3C – Materiality		
SCR - B3C - Disclosure	This template should not be public	
SCR - B3C – Frequency	This template should only be annual	
SCR - B3C – Open issues		
SCR - B3C- cell A1		
SCR - B3C- cell A1A		
SCR - B3C- cell B1		
SCR - B3C- cell B1A		

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SCR - B3C- cell C1		
SCR - B3C- cell B1B		
SCR - B3C- cell D1		
SCR - B3C- cell C1A		
SCR - B3C- cell D1A		
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 C2A		
SCR - B3C- cell D2A		
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 C3A		
SCR - B3C- cell D3A		
SCR - B3C- cell C04		
SCR - B3C- cell D04		
SCR - B3C- cell A4		

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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 C4A		
SCR - B3C- cell D4A		
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 C5A		
SCR - B3C- cell D5A		
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		

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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 C8A		
SCR - B3C- cell D8A		
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 A10		
SCR - B3C- cell A10A		
SCR - B3C- cell B10		
SCR - B3C- cell B10A		
SCR - B3C- cell C10		

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SCR - B3C- cell B10B		
SCR - B3C- cell D10		
SCR - B3C- cell C10A		
SCR - B3C- cell D10A		
SCR - B3C- cell C11		
SCR - B3C- cell D11		
SCR - B3C- cell C12		
SCR - B3C- cell D12		
SCR - B3C- cell A13		
SCR - B3C- cell A14		
SCR - B3C- cell A15		
SCR - B3D – General	The benefits of reporting the assets allowed by underwriting risk module are low, and the cost of implementation may be significant. We propose to limit this template to liabilities and SCR reporting	
SCR - B3D – Purpose		
SCR - B3D – Benefits		
SCR - B3D – Costs		
SCR - B3D – Groups		
SCR - B3D – Materiality		
SCR - B3D - Disclosure		
SCR - B3D – Frequency		
SCR - B3D – Open issues		
SCR - B3D- cell A1		
SCR - B3D- cell A1A		
SCR - B3D- cell B1		

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SCR - B3D- cell B1A		
SCR - B3D- cell C1		
SCR - B3D- cell B1B		
SCR - B3D- cell D1		
SCR - B3D- cell C1A		
SCR - B3D- cell D1A		
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 C2A		
SCR - B3D- cell D2A		
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 C3A		
SCR - B3D- cell D3A		
SCR - B3D- cell C04		
SCR - B3D- cell D04		

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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 C4A		
SCR - B3D- cell D4A		
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 C5A		
SCR - B3D- cell D5A		
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		

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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 C8A		
SCR - B3D- cell D8A		
SCR - B3D- cell A9		
SCR - B3D- cell A9A		
SCR - B3D- cell B9		
SCR - B3D- cell B9A		
SCR - B3D- cell C9		
SCR - B3D- cell B9B		
SCR - B3D- cell D9		
SCR - B3D- cell C10		
SCR - B3D- cell D10		
SCR - B3D- cell C11		
SCR - B3D- cell D11		

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SCR - B3D- cell E9		
SCR - B3D- cell F9		
SCR - B3D- cell G9		
SCR - B3D- cell A12		
SCR - B3D- cell A12A		
SCR - B3D- cell B12		
SCR - B3D- cell C12		
SCR - B3D- cell D12		
SCR - B3D- cell E12		
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		

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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 C18A		
SCR - B3D- cell A18		
SCR - B3D- cell A18A		
SCR - B3D- cell B18		
SCR - B3D- cell B18A		
SCR - B3D- cell C18		
SCR - B3D- cell A19		
SCR - B3D- cell A19A		
SCR - B3D- cell B19		
SCR - B3D- cell B19A		
SCR - B3D- cell C19		
SCR - B3D- cell A20		
SCR - B3D- cell A20A		
SCR - B3D- cell B20		
SCR - B3D- cell B20A		
SCR - B3D- cell C20		
SCR - B3D- cell A21		
SCR - B3D- cell A22		
SCR - B3D- cell A23		

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SCR - B3D- cell A24		
SCR - B3D- cell A25		
SCR - B3D- cell A26		
SCR - B3D- cell A27		
SCR - B3D- cell A28		
SCR - B3D- cell A29		
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 – Open issues		
SCR - B3E- cell A1		
SCR - B3E- cell A1A		
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		

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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		
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		

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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		
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		

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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		
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 C15A		

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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 A16A		
SCR - B3E- cell B16		
SCR - B3E- cell B16A		
SCR - B3E- cell C16		
SCR - B3E- cell A17		
SCR - B3E- cell A17A		
SCR - B3E- cell B17		
SCR - B3E- cell B17A		
SCR - B3E- cell C17		
SCR - B3E- cell A18A		
SCR - B3E- cell A18B		
SCR - B3E- cell A18		
SCR - B3E- cell A19		
SCR - B3E- cell A20		
SCR - B3F – General		
SCR - B3F – Purpose		
SCR - B3F – Benefits		
SCR - B3F – Costs		
SCR - B3F – Groups		

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SCR - B3F – Materiality		
SCR - B3F - Disclosure		
SCR - B3F – Frequency		
SCR - B3F – Open issues		
SCR - B3F- cell A1		
SCR - B3F- cell B1		
SCR - B3F- cell C1		
SCR - B3F- cell D1		
SCR - B3F- cell E1		
SCR - B3F- cell A2		
SCR - B3F- cell B2		
SCR - B3F- cell C2		
SCR - B3F- cell D2		
SCR - B3F- cell E2		
SCR - B3F- cell A3		
SCR - B3F- cell B3		
SCR - B3F- cell C3		
SCR - B3F- cell D3		
SCR - B3F- cell E3		
SCR - B3F- cell A20		
SCR - B3F- cell B20		
SCR - B3F- cell C20		
SCR - B3F- cell D20		
SCR - B3F- cell E20		
SCR - B3F- cell A21		

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SCR - B3F- cell B21		
SCR - B3F- cell C21		
SCR - B3F- cell D21		
SCR - B3F- cell A22		
SCR - B3F- cell B22		
SCR - B3F- cell C22		
SCR - B3F- cell D22		
SCR - B3F- cell A23		
SCR - B3F- cell B23		
SCR - B3F- cell C23		
SCR - B3F- cell D23		
SCR - B3F- cell E23		
SCR - B3F- cell F24		
SCR - B3F- cell A25		
SCR - B3F- cell B25		
SCR - B3F- cell C25		
SCR - B3F- cell D25		
SCR - B3F- cell E25		
SCR - B3F- cell F25		
SCR - B3F- cell G25		
SCR - B3F- cell A26		
SCR - B3F- cell A27		
SCR - B3F- cell A28		
SCR - B3F- cell D29		
SCR - B3F- cell E29		
SCR - B3F- cell D30		

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SCR - B3F- cell E30		
SCR - B3F- cell D31		
SCR - B3F- cell E31		
SCR - B3F- cell D32		
SCR - B3F- cell E32		
SCR - B3F- cell A33		
SCR - B3F- cell B33		
SCR - B3F- cell C33		
SCR - B3F- cell F33		
SCR - B3F- cell G33		
SCR - B3F- cell H33		
SCR - B3F- cell A34		
SCR - B3F- cell B34		
SCR - B3F- cell C34		
SCR - B3F- cell D34		
SCR - B3F- cell E34		
SCR - B3F- cell F34		
SCR - B3F- cell G34		
SCR - B3F- cell H34		
SCR - B3F- cell A35		
SCR - B3F- cell B35		
SCR - B3F- cell C35		
SCR - B3F- cell D35		
SCR - B3F- cell A36		
SCR - B3F- cell B36		
SCR - B3F- cell C36		

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SCR - B3F- cell D36		
SCR - B3F- cell E36		
SCR - B3F- cell A37		
SCR - B3F- cell B37		
SCR - B3F- cell C37		
SCR - B3F- cell D37		
SCR - B3F- cell E37		
SCR - B3F- cell A38		
SCR - B3F- cell A39		
SCR - B3G – General		
SCR - B3G – Purpose		
SCR - B3G – Benefits		
SCR - B3G – Costs		
SCR - B3G – Groups		
SCR - B3G – Materiality		
SCR - B3G - Disclosure		
SCR - B3G – Frequency		
SCR - B3G – Open issues		
SCR - B3G- cell A1		
SCR - B3G- cell A2		
SCR - B3G- cell A3		
SCR - B3G- cell A4		
SCR - B3G- cell A5		
SCR - B3G- cell A6		

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SCR - B3G- cell A7		
SCR - B3G- cell A8		
SCR - B3G- cell A9		
SCR - B3G- cell A10		
SCR - B3G- cell A11		
SCR - B3G- cell A12		
SCR - B3G- cell A13		
SCR - B3G- cell A14		
SCR - B3G- cell A15		
SCR - B3G- cell A16		
MCR - B4A & B4B – General		
MCR - B4A & B4B – Purpose		
MCR - B4A & B4B – Benefits		
MCR - B4A & B4B – Costs		
MCR - B4A & B4B – Groups		
MCR - B4A & B4B – Materiality		
MCR - B4A & B4B - Disclosure		
MCR - B4A & B4B – Frequency		
MCR - B4A & B4B – Open issues		
MCR - B4A- cell A1		
MCR - B4A- cell B2		

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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		

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MCR - B4A- cell C15		
MCR - B4A- cell B16		
MCR - B4A- cell C16		
MCR - B4A- cell B17		
MCR - B4A- cell C17		
MCR - B4A- cell A18		
MCR - B4A- cell B19		
MCR - B4A- cell B20		
MCR - B4A- cell B21		
MCR - B4A- cell B22		
MCR - B4A- cell C23		
MCR - B4A- cell A24		
MCR - B4A- cell A25		
MCR - B4A- cell A26		
MCR - B4A- cell A27		
MCR - B4A- cell A28		
MCR - B4A- cell A29		
MCR - B4A- cell A30		
MCR - 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		

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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		

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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		

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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		

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MCR - B4B- cell A31		
MCR - B4B- cell B32		
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		
C2 – General	<p>What information is required in the columns "<i>Information on cash-flows during the reporting period</i>"? Do they refer to real cash flowing during the year? How have these columns been defined?</p> <p>Amounts should reported net of taxes.</p>	
C2 – Purpose		
C2 – Benefits		
C2 – Costs		

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C2 – Groups		
C2 – Materiality		
C2 - Disclosure	C2 - analysis Life and C2 analysis non life are too detailed to be publically disclosed	
C2 – Frequency		
C2 – Open issues		
C2 - Summary- cell A0		
C2 - Summary- cell A1		
C2 - Summary- cell B1		
C2 - Summary- cell C1		
C2 - Summary- cell D1		
C2 - Summary- cell E1		
C2 - Summary- cell F1		
C2 - Summary- cell G1		
C2 - Summary- cell R1		
C2 - Summary- cell H1		
C2 - Summary- cell I1		
C2 - Summary- cell J1		
C2 - Summary- cell K1		
C2 - Summary- cell L1		
C2 - Summary- cell M1		
C2 - Summary- cell O1		
C2 - Summary- cell P1		
C2 - Summary- cell Q1		

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C2 - Analysis_Life- cell O1		
C2 - Analysis_Life- cell O2		
C2 - Analysis_Life- cell O3		
C2 - Analysis_Life- cell O4		
C2 - Analysis_Life- cell a1		
C2 - Analysis_Life- cell a2		
C2 - Analysis_Life- cell a3		
C2 - Analysis_Life- cell a4		
C2 - Analysis_Life- cell b1		
C2 - Analysis_Life- cell b2		
C2 - Analysis_Life- cell b3		
C2 - Analysis_Life- cell b4		
C2 - Analysis_Life- cell c1		
C2 - Analysis_Life- cell c2		
C2 - Analysis_Life- cell c3		
C2 - Analysis_Life- cell c4		
C2 - Analysis_Life- cell d1		
C2 - Analysis_Life- cell d2		
C2 - Analysis_Life- cell d3		
C2 - Analysis_Life- cell d4		
C2 - Analysis_Life- cell e1		
C2 - Analysis_Life- cell e2		
C2 - Analysis_Life- cell e3		
C2 - Analysis_Life- cell e4		
C2 - Analysis_Life- cell f1		
C2 - Analysis_Life- cell f2		

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C2 - Analysis_Life- cell f3		
C2 - Analysis_Life- cell f4		
C2 - Analysis_Life- cell g1		
C2 - Analysis_Life- cell g2		
C2 - Analysis_Life- cell g3		
C2 - Analysis_Life- cell g4		
C2 - Analysis_Life- cell h1		
C2 - Analysis_Life- cell i1		
C2 - Analysis_Life- cell j1		
C2 - Analysis_Life- cell k1		
C2 - Analysis_Life- cell k2		
C2 - Analysis_Life- cell k3		
C2 - Analysis_Life- cell k4		
Country - K1– General	Information should be reported by LoB or main LOB not by class	
Country - K1– Purpose		
Country - K1– Benefits		
Country - K1– Costs		
Country - K1– Groups		
Country - K1– Materiality		
Country - K1– Disclosure		
Country - K1– Frequency		
Country - K1– Open issues		
Country - K1- cell A1		
Country - K1- cell A2		

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Country - K1- cell A3		
Country - K1- cell A4		
Country - K1- cell B1		
Country - K1- cell B2		
Country - K1- cell B3		
Country - K1- cell B4		
Country - K1- cell C1		
Country - K1- cell C2		
Country - K1- cell C3		
Country - K1- cell C4		
Country - K1- cell D1		
Country - K1- cell D2		
Country - K1- cell D3		
Country - K1- cell D4		
Country - K1- cell E1		
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 - A1- General		

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Cover - A1- Purpose		
Cover - A1- Benefits		
Cover - A1- Costs		
Cover - A1- Groups		
Cover - A1- Materiality		
Cover - A1- Disclosure		
Cover - A1- Frequency		
Cover - A1- Open issues		
Cover - A1- cell A1		
Cover - A1- cell A2		
Cover - A1- cell A3		
Cover - A1- cell A4		
Cover - A1- cell A5		
Cover - A1- cell A6		
Cover - A1- cell A7		
Cover - A1- cell A8		
Cover - A1- cell A9		
Cover - A1- cell A10		
Cover - A1- cell A11		
Cover - A1- cell A12		
Cover - A1- cell A12A		
Cover - A1- cell A13		
Cover - A1- cell A14		
Cover - A1- cell A15		

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Cover - A1- cell A19		
Cover - A1- cell A20		
Cover - A1- cell A21		
Cover - A1- cell A22		
Cover - A1- cell A23		
Cover - A1- cell B1		
Cover - A1- cell B2		
Cover - A1- cell C1		
Cover - A1- cell E1		
Cover - A1- cell F1		
Cover - A1- cell G1		
Cover - A1- cell E1A		
Cover - A1- cell F1A		
Cover - A1- cell G1A		
Cover - A1- cell I1		
Cover - A1- cell I2		
Cover - A1- cell I3		
Cover - A1- cell I3A		
Cover - A1- cell I4		
Cover - A1- cell I5		
Cover - A1- cell I6		
Cover - A1- cell I7		
Cover - A1- cell I8		
Cover - A1- cell I9		
Cover - A1- cell I10		
Cover - A1- cell I11		

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Cover - A1- cell J1		
Cover - A1- cell L1		
Cover - A1- cell M1		
Cover - A1- cell L1A	In comparison to premium and claims, it does not make sense to split total expenses to LOB level (and especially not the reinsurer's share). There needs to be a clear definition of what is included in expenses paid (commissions / acquisition cost, admin cost, claims handling expenses, overheads, corporate centre recharges..). We propose to stick with just directly attributable expenses such as commissions (we would favour a definition that is in line with IFRS). While other expenses can be allocated, we do not believe this information adds any value.	
Cover - A1- cell M1A	Normally there is no explicit share from the reinsurer on the expense side.	
Assets - D1- General	<p>Could you provide a table of correspondence giving for each ISIN code the CIC Code and the issuer Group: this work would be burdensome if done by each company instead of being done each quarter by supervisors; it will also insure a better comparability and accuracy.</p> <p><i>Many details are required about the issuer and/or the type of collateral pledged. In case of a guarantor different from the issuer the information should be given: this case is frequently for structured product (A6 and A8 to A11)</i></p>	
Assets - D1- Purpose		
Assets - D1- Benefits		
Assets - D1- Costs		
Assets - D1- Groups		
Assets - D1- Materiality		
Assets - D1- Disclosure		
Assets - D1- Frequency		

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Assets – D1 – Quarterly Exemption		
Assets - D1- Open issues		
Assets - D1- cell A1	« Portfolio » as defined in this template does not fit with the classification usually used by companies in asset management. This column should contain the name of the portfolio, or mandate, of the asset. Usually it may be the general portfolio of the insurer.	
Assets - D1- cell A2		
Assets - D1- cell A3		
Assets - D1- cell A4		
Assets - D1- cell A5		
Assets - D1- cell A6		
Assets - D1- cell A7		
Assets - D1- cell A8		
Assets - D1- cell A9		
Assets - D1- cell A10		
Assets - D1- cell A11		
Assets - D1- cell A12		
Assets - D1- cell A13		
Assets - D1- cell A15		
Assets - D1- cell A16		
Assets - D1- cell A17	It should be prescribed that this information is required only if it is available on the market.	
Assets - D1- cell A18		
Assets - D1- cell A19		
Assets - D1- cell A20		
Assets - D1- cell A22		

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Assets - D1- cell A23		
Assets - D1- cell A24		
Assets - D1- cell A25		
Assets - D1- cell A26		
Assets - D1- cell A28		
Assets - D1- cell A30		
Assets - D1A- General	<p>It should be prescribed that information related to Structured products within funds are required in this template (if there is a look-through vision for the fund). This template seems to be made in particular for the CDO. There are many others structured products for which this template could be not appropriate (complex interest rate product for example)</p> <p><i>See the general comment about guarantor and issuer in the D1 templates.</i></p>	
Assets - D1A- Purpose		
Assets - D1A- Benefits		
Assets - D1A- Costs		
Assets - D1A- Groups		
Assets - D1A- Materiality		
Assets - D1A- Disclosure		
Assets - D1A- Frequency		
Assets - D1A- Open issues		
Assets - D1A- cell A1		
Assets - D1A- cell A2		

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Assets - D1A- cell A3		
Assets - D1A- cell A4		
Assets - D1A- cell A5		
Assets - D1A- cell A6		
	<i>Risks as : -Implied volatility, -Slope in the interest-rate curve, -Implied correlations, May be significant for structured products, there should be reported in this template</i>	
Assets - D1A- cell A7		
Assets - D1A- cell A8		
Assets - D1A- cell A15		
Assets - D1A- cell A16		
Assets - D1A- cell A9	A9/A10 (fixed annual return / variable annual return): to be prescribed. How should companies report this information if the return is partially fixed and partially variable. This information may be difficult to disclose for structured product because there are structured (it can be one of the definition of the structuration).	
Assets - D1A- cell A10		
Assets - D1A- cell A12	Loss Given Default : the calculation of the LGD should be prescribed or suppressed	
Assets - D1A- cell A13		
Assets - D1A- cell A14		
Assets – D2- General		
Assets – D2- Purpose		
Assets – D2- Benefits		
Assets – D2- Costs		

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Assets – D2- Groups		
Assets – D2- Materiality		
Assets – D2- Disclosure		
Assets – D2- Frequency		
Assets – D2 – Quarterly Exemption		
Assets – D2- Open issues		
Assets - D2- cell A1		
Assets - D2- cell A2		
Assets - D2- cell A3		
Assets - D2- cell A4		
Assets - D2- cell A5		
Assets - D2- cell A6		
Assets - D2- cell A7		
Assets - D2- cell A8		
Assets - D2- cell A9		
Assets - D2- cell A10		
Assets - D2- cell A11		
Assets - D2- cell A13	A13 : In case of micro-hedging a field should be envisioned in order to identify hedged assets and assets derivatives strategy by strategy (see also template D3 about profit and loss)	
Assets - D2- cell A14	A14 (delta) – the information is complex and costly to disclose on a quarterly basis: the valuation of complex derivatives require stochastic modelling. In case of several underlying assets or risk factor, requirement of this field should be prescribed	

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	A14: proposition of adding a field to report the theta of the derivatives: this is a simple way to indentify if a complex derivative is buyer or seller of an option (by reference to the risk free rate); it is an additive measure of the risk-return of a product. In this case the calculation required should be prescribed.	
Assets - D2- cell A15		
Assets - D2- cell A16		
Assets - D2- cell A17		
Assets - D2- cell A18		
Assets - D2- cell A19		
Assets - D2- cell A20		
Assets - D2- cell A21		
Assets - D2- cell A22		
Assets - D2- cell A23		
Assets - D2- cell A24		
Assets - D2- cell A25		
Assets - D2- cell A26		
Assets - D2- cell A27		
Assets - D2- cell A28		
Assets - D2- cell A29		
Assets - D2- cell A30		
Assets – D3- General	In case of micro-hedging a the derivative should be aggregated with the hedged asset, and reported in the same category (see also template D2 about derivatives)	
Assets – D3- Purpose		
Assets – D3- Benefits		
Assets – D3- Costs		

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Assets – D3- Groups		
Assets – D3- Materiality		
Assets – D3- Disclosure		
Assets – D3- Frequency		
Assets – D3- Open issues		
Assets - D3- cell A1		
Assets - D3- cell A3		
Assets - D3- cell A4		
Assets - D3- cell A6		
Assets - D3- cell A7		
Assets - D3- cell A8		
Assets - D3- cell A15		
Assets – D4- General	<p>The requirement to disclose information on funds on an iterative look through basis is extremely difficult and costly for companies. In certain cases, it may be impossible to implement.</p> <p>We recommend to precise threshold of materiality depending on :</p> <ul style="list-style-type: none"> -Complexity of the fund and/or of the assets in the fund -Relative part of the modelised asset in the balance sheet and/or compared with the SCR <p>Relative to these materiality thresholds, the use of benchmarks and information notice should be permitted.</p>	
Assets – D4- Purpose		
Assets – D4- Benefits		
Assets – D4- Costs		
Assets – D4- Groups		

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Assets – D4- Materiality		
Assets – D4- Disclosure		
Assets – D4- Frequency		
Assets – D4 – Quarterly Exemption		
Assets – D4- Open issues		
Assets - D4- cell A1		
Assets - D4- cell A2		
Assets - D4- cell A3		
Assets - D4- cell A4	A4 and A6: the reality of the currency exposure is not reported. The currency exposure can be different from the financial statement one (Cell A6): for example a fund of American equity can be denominated in euro and, independently, hedged or not against the currency risk. The net hedged (after hedging) exposure should be reported.	
Assets - D4- cell A5		
Assets - D4- cell A6		
Assets - D4- cell A7		
Assets - D4- cell A8		
Assets – D5- General		
Assets – D5- Purpose		
Assets – D5- Benefits		
Assets – D5- Costs		
Assets – D5- Groups		
Assets – D5- Materiality		
Assets – D5- Disclosure		

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Assets – D5- Frequency		
Assets – D5- Open issues		
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		
Assets - D5- cell A8		
Assets - D5- cell A9		
Assets - D5- cell A10		
Assets - D5- cell A11		
Assets - D5- cell A12		
Assets - D5- cell A13		
Assets - D5- cell A14		
Assets – D6- General		
Assets – D6- Purpose		
Assets – D6- Benefits		
Assets – D6- Costs		
Assets – D6- Groups		
Assets – D6- Materiality		
Assets – D6- Disclosure		
Assets – D6- Frequency		

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Assets – D6- Open issues		
Assets - D6- cell A2		
Assets - D6- cell A3		
Assets - D6- cell A4		
Assets - D6- cell A5		
Assets - D6- cell A6		
Assets - D6- cell A7	A7: the fund manager of an investment fund is not representative of the concentration risk. For investment fund the information should be reported in another field. The aggregation of issuer and fund manager, if there are in the same financial group (which is very frequent) can be very misleading.	
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	Contracts without options, and Contracts with options and guarantees, are two sub-LOBs that have been newly introduced only in the QRT. We believe that this causes unnecessary burden on the companies, and suggest to only sticking with the main-LOBs.	

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TP - F1 & F1Q - Purpose	<p>Purpose seems too high. The templates only give an overview of TP with a split between LOBs.</p> <p>It is hard and may be dangerous to say that the template enables the supervisor to better understand the valuation of TP and monitor risks through that template.</p>	
TP - F1 & F1Q - Benefits	<p>Potential benefits seem too extensive compared to the reality of the template which only gives an overlook of the technical provisions.</p> <p>It is not serious to say that, with this template, supervisors can say that "TP are adequate and their calculation complies with the principle of market consistency".</p>	
TP - F1 & F1Q - Costs		
TP - F1 & F1Q - Groups	Agreed	
TP - F1 & F1Q - Materiality		
TP - F1 & F1Q - Disclosure	<p>F1Q (limited to the main LOBs) seems the right level of an understandable disclosure.</p> <p>F1Q gives the right information about what are the real lines of business of the insurer thanks to the amount of TP by LOB.</p>	
TP - F1 & F1Q - Frequency	<p>As soon as BE are only calculated on an annual basis (due to stochastic projections), frequency of this template should only be annual.</p> <p>See General comment: if quarterly reporting remains, use of guidelines enabling proxies, no approval by ASMB.</p>	
TP - F1 & F1Q - Open issues	<p>9.a see F1 & F1Q disclosure.</p> <p>9.b Counterparty sectors are nothing to do with prudential supervision and BE calculation. They should not be introduced. They should be kept in a direct non prudential BCE survey.</p>	
TP - F1- cell A1		

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TP - F1- cell A3		
TP - F1- cell A5		
TP - F1- cell A6		
TP - F1- cell A7		
TP - F1- cell A10		
TP - F1- cell A12		
TP - F1- cell B1		
TP - F1- cell B2		
TP - F1- cell B3		
TP - F1- cell B4		
TP - F1- cell B5		
TP - F1- cell B6		
TP - F1- cell B7		
TP - F1- cell B8		
TP - F1- cell B10		
TP - F1- cell B11		
TP - F1- cell B12		
TP - F1- cell B13		
	<p>1. Although it may be actuarially interesting to split best estimates between future premiums, future benefits, and future expenses BE components, we don't see the need to report it in the QRT.</p> <p>2. If this split was to be retained, it should be clearer in the template words that lines BA, BB, BC, CA, CB, CC, CD, C, D are best estimates components.</p>	
TP - F1- cell BA1		
TP - F1- cell BA2	See BA1	
TP - F1- cell BA4	See BA1	

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TP - F1- cell BA6	See BA1	
TP - F1- cell BA7	See BA1	
TP - F1- cell BA10	See BA1	
TP - F1- cell BA12	See BA1	
TP - F1- cell BB1	See BA1	
TP - F1- cell BB10	See BA1	
TP - F1- cell BB12	See BA1	
TP - F1- cell BC1	See BA1	
TP - F1- cell BC2	See BA1	
TP - F1- cell BC4	See BA1	
TP - F1- cell BC6	See BA1	
TP - F1- cell BC7	See BA1	
TP - F1- cell BC10	See BA1	
TP - F1- cell BC12	See BA1	
TP - F1- cell BD1	See BA1	
TP - F1- cell BD2	See BA1	
TP - F1- cell BD4	See BA1	
TP - F1- cell BD6	See BA1	
TP - F1- cell BD7	See BA1	
TP - F1- cell BD10	See BA1	
TP - F1- cell BD12	See BA1	
TP - F1- cell BF1	See BA1	
TP - F1- cell BF2	See BA1	
TP - F1- cell BF4	See BA1	
TP - F1- cell BF6	See BA1	
TP - F1- cell BF7	See BA1	

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TP - F1- cell BF10	See BA1	
TP - F1- cell BF12	See BA1	
	<p>1. Why does EIOPA need reinsurance recoverables split into so many categories, by LOB? There could be non-proportional treaties (especially in Life insurance), and definitely SPV / Finite Reinsurances that cover more than one LOB. Requesting such splits not only causes undue burden to companies, but also introduces high risk of spurious accuracy (or worse artificial allocations). Suggest to remove this requirement split by LOBs (but only have it in total across all LOBs)</p> <p>2. If it was remained, we don't see the need to split recoverable between finite, SPV, and non finite and SPV. Most of the times PSV and finite cases will be empty.</p>	
TP - F1- cell CB1	Other way should be found to get the SPV and finite information.	
TP - F1- cell CB2	See CB1	
TP - F1- cell CB3	See CB1	
TP - F1- cell CB4	See CB1	
TP - F1- cell CB5	See CB1	
TP - F1- cell CB6	See CB1	
TP - F1- cell CB7	See CB1	
TP - F1- cell CB8	See CB1	
TP - F1- cell CB9	See CB1	
TP - F1- cell CB9A	See CB1	
TP - F1- cell CB10	See CB1	
TP - F1- cell CB11	See CB1	
TP - F1- cell CB12	See CB1	
TP - F1- cell CB13	See CB1	

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TP - F1- cell CB13A	See CB1	
TP - F1- cell CC1	See CB1	
TP - F1- cell CC2	See CB1	
TP - F1- cell CC3	See CB1	
TP - F1- cell CC4	See CB1	
TP - F1- cell CC5	See CB1	
TP - F1- cell CC6	See CB1	
TP - F1- cell CC7	See CB1	
TP - F1- cell CC8	See CB1	
TP - F1- cell CC9	See CB1	
TP - F1- cell CC10	See CB1	
TP - F1- cell CC11	See CB1	
TP - F1- cell CC12	See CB1	
TP - F1- cell CC13	See CB1	
TP - F1- cell CD1	See CB1	
TP - F1- cell CD2	See CB1	
TP - F1- cell CD3	See CB1	
TP - F1- cell CD4	See CB1	
TP - F1- cell CD5	See CB1	
TP - F1- cell CD6	See CB1	
TP - F1- cell CD7	See CB1	
TP - F1- cell CD8	See CB1	
TP - F1- cell CD9	See CB1	
TP - F1- cell CD9A	See CB1	
TP - F1- cell CD10	See CB1	
TP - F1- cell CD11	See CB1	

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TP - F1- cell CD12	See CB1	
TP - F1- cell CD13	See CB1	
TP - F1- cell CD13A	See CB1	
TP - F1- cell C1	See CB1	
TP - F1- cell C2	See CB1	
TP - F1- cell C3	See CB1	
TP - F1- cell C4	See CB1	
TP - F1- cell C5	See CB1	
TP - F1- cell C6	See CB1	
TP - F1- cell C7	See CB1	
TP - F1- cell C8	See CB1	
TP - F1- cell C9A	See CB1	
TP - F1- cell C10	See CB1	
TP - F1- cell C11	See CB1	
TP - F1- cell C12	See CB1	
TP - F1- cell C13	See CB1	
TP - F1- cell C13A	See CB1	
TP - F1- cell E1		
TP - F1- cell E2		
TP - F1- cell E4		
TP - F1- cell E6		
TP - F1- cell E7		
TP - F1- cell E10		
TP - F1- cell E12		
TP - F1- cell G1		
TP - F1- cell G2		

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TP - F1- cell G3		
TP - F1- cell G4		
TP - F1- cell G5		
TP - F1- cell G6		
TP - F1- cell G7		
TP - F1- cell G8		
TP - F1- cell G10		
TP - F1- cell G11		
TP - F1- cell G12		
TP - F1- cell G13		
TP - F1- cell GA1		
TP - F1- cell GA2		
TP - F1- cell GA3		
TP - F1- cell GA4		
TP - F1- cell GA5		
TP - F1- cell GA6		
TP - F1- cell GA7		
TP - F1- cell GA8		
TP - F1- cell GA10		
TP - F1- cell GA11		
TP - F1- cell GA12		
TP - F1- cell GA13		
TP - F1- cell GB1		
TP - F1- cell GB2		
TP - F1- cell GB3		
TP - F1- cell GB4		

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TP - F1- cell GB5		
TP - F1- cell GB6		
TP - F1- cell GB7		
TP - F1- cell GB8		
TP - F1- cell GB10		
TP - F1- cell GB11		
TP - F1- cell GB12		
TP - F1- cell GB13		
TP - F1- cell I1		
TP - F1- cell I2		
TP - F1- cell I3		
TP - F1- cell I4		
TP - F1- cell I6		
TP - F1- cell I10		
TP - F1- cell I12		
TP - F1- cell IA1		
TP - F1- cell IA2		
TP - F1- cell IA3		
TP - F1- cell IA4		
TP - F1- cell IA6		
TP - F1- cell IA10		
TP - F1- cell IA12		
TP - F1- cell J1	<p>BE by location of risk in a life undertaking are generally not followed. Usually only the location of the underwriting is known.</p> <p>In Europe, individuals are free to move and establish where they want and they have no obligation to say where they live thanks to European regulation.</p>	

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	That's why we don't see the value and the accuracy of this information.	
TP - F1- cell J2	See J1	
TP - F1- cell J4	See J1	
TP - F1- cell J6	See J1	
TP - F1- cell J7	See J1	
TP - F1- cell J10	See J1	
TP - F1- cell J12	See J1	
TP - F1- cell JA1	See J1	
TP - F1- cell JA2	See J1	
TP - F1- cell JA4	See J1	
TP - F1- cell JA6	See J1	
TP - F1- cell JA7		
TP - F1- cell JA10	See J1	
TP - F1- cell JA12	See J1	
TP - F1- cell JB1	See J1	
TP - F1- cell JB2	See J1	
TP - F1- cell JB4	See J1	
TP - F1- cell JB6	See J1	
TP - F1- cell JB7	See J1	
TP - F1- cell JB10	See J1	
TP - F1- cell JB12	See J1	
TP - F1- cell JC1	See J1	
TP - F1- cell JC2	See J1	
TP - F1- cell JC4	See J1	
TP - F1- cell JC6	See J1	

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TP - F1- cell JC7	See J1	
TP - F1- cell JC10	See J1	
TP - F1- cell JC12	See J1	
TP - F1- cell JD1	See J1	
TP - F1- cell JD2	See J1	
TP - F1- cell JD4	See J1	
TP - F1- cell JD6	See J1	
TP - F1- cell JD7	See J1	
TP - F1- cell JD10	See J1	
TP - F1- cell JD12	See J1	
TP - F1- cell JE1	See J1	
TP - F1- cell JE2	See J1	
TP - F1- cell JE4	See J1	
TP - F1- cell JE6	See J1	
TP - F1- cell JE7	See J1	
TP - F1- cell JE10	See J1	
TP - F1- cell JE12	See J1	
TP - F1- cell JF1	See J1	
TP - F1- cell JF2	See J1	
TP - F1- cell JF4	See J1	
TP - F1- cell JF6	See J1	
TP - F1- cell JF7	See J1	
TP - F1- cell JF10	See J1	
TP - F1- cell JF12	See J1	
TP - F1- cell JG1	See J1	
TP - F1- cell JG2	See J1	

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TP - F1- cell JG4	See J1	
TP - F1- cell JG6	See J1	
TP - F1- cell JG7	See J1	
TP - F1- cell JG10	See J1	
TP - F1- cell JG12	See J1	
TP - F1- cell JH1	See J1	
TP - F1- cell JH2	See J1	
TP - F1- cell JH4	See J1	
TP - F1- cell JH6	See J1	
TP - F1- cell JH7	See J1	
TP - F1- cell JH10	See J1	
TP - F1- cell JH12	See J1	
TP - F1- cell JI1	See J1	
TP - F1- cell JI2	See J1	
TP - F1- cell JI4	See J1	
TP - F1- cell JI6	See J1	
TP - F1- cell JI7	See J1	
TP - F1- cell JI10	See J1	
TP - F1- cell JI12	See J1	
TP - F1- cell JJ1	See J1	
TP - F1- cell JJ2	See J1	
TP - F1- cell JJ4	See J1	
TP - F1- cell JJ6	See J1	
TP - F1- cell JJ7	See J1	
TP - F1- cell JJ10	See J1	
TP - F1- cell JJ12	See J1	

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TP - F1- cell JK1	See J1	
TP - F1- cell JK2	See J1	
TP - F1- cell JK4	See J1	
TP - F1- cell JK6	See J1	
TP - F1- cell JK7	See J1	
TP - F1- cell JK10	See J1	
TP - F1- cell JK12	See J1	
TP - F1- cell JL1	See J1	
TP - F1- cell JL2	See J1	
TP - F1- cell JL4	See J1	
TP - F1- cell JL6	See J1	
TP - F1- cell JL7	See J1	
TP - F1- cell JL10	See J1	
TP - F1- cell JL12	See J1	
TP - F1- cell K1	<ol style="list-style-type: none"> 1. If the template F3 remains, this information already exists in template F3. It should be suppressed from template F1. 2. We don't see the actuarial value of knowing the number of HRG for the supervisor. 3. We don't think that it is possible to answer No to the question "further segmentation into HRG". Lobs are too high level usually to enable a correct calculation of TP. 	
TP - F1- cell K2	See K1	
TP - F1- cell K4	See K1	
TP - F1- cell K6	See K1	
TP - F1- cell K7	See K1	
TP - F1- cell K10	See K1	
TP - F1- cell K12	See K1	

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TP - F1- cell L1	See K1	
TP - F1- cell L2	See K1	
TP - F1- cell L4	See K1	
TP - F1- cell L6	See K1	
TP - F1- cell L7	See K1	
TP - F1- cell L10	See K1	
TP - F1- cell L12	See K1	
	<ol style="list-style-type: none"> 1. This qualitative information should not be produced in a quantitative template but in the RSR and in the actuarial function report. It is not a good think to mix quantitative templates and qualitative information. 2. Whatever calculations are produced, a simplification is processed. It is the nature of modelling. Answering "Yes" will be usual. What is more important is to know if simplifications are acceptable and are breaking materiality policies. 3. Explaining Solvency 2 methods, assumptions, data, and calculations in quantitative cell is not serious. 	
TP - F1- cell M1		
TP - F1- cell M2	See M1	
TP - F1- cell M4	See M1	
TP - F1- cell M6	See M1	
TP - F1- cell M7	See M1	
TP - F1- cell M10	See M1	
TP - F1- cell M12	See M1	
TP - F1- cell N1	See M1	
TP - F1- cell N2	See M1	
TP - F1- cell N4	See M1	
TP - F1- cell N6	See M1	
TP - F1- cell N7	See M1	
TP - F1- cell N10	See M1	

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TP - F1- cell O1	See M1	
TP - F1- cell O2	See M1	
TP - F1- cell O4	See M1	
TP - F1- cell O6	See M1	
TP - F1- cell O7	See M1	
TP - F1- cell O10	See M1	
TP - F1- cell O12	See M1	
TP - F1- cell P1		
TP - F1- cell P2		
TP - F1- cell P3		
TP - F1- cell P4		
TP - F1- cell P5		
TP - F1- cell P6		
TP - F1- cell P7		
TP - F1- cell P8		
TP - F1- cell P9		
TP - F1- cell P10		
TP - F1- cell P11		
TP - F1- cell P12		
TP - F1- cell P13		
TP - F1- cell P14		
TP - F1- cell P15		
TP - F1- cell P16		
TP - F1Q- cell A1		
TP - F1Q- cell A3		

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TP - F1Q- cell A5		
TP - F1Q- cell A6		
TP - F1Q- cell A7		
TP - F1Q- cell A10		
TP - F1Q- cell A12		
TP - F1Q- cell B1		
TP - F1Q- cell B2		
TP - F1Q- cell B3		
TP - F1Q- cell B4		
TP - F1Q- cell B5		
TP - F1Q- cell B6		
TP - F1Q- cell B7		
TP - F1Q- cell B8		
TP - F1Q- cell B10		
TP - F1Q- cell B11		
TP - F1Q- cell B12		
TP - F1Q- cell B13		
TP - F1Q- cell C1		
TP - F1Q- cell C2		
TP - F1Q- cell C3		
TP - F1Q- cell C4		
TP - F1Q- cell C5		
TP - F1Q- cell C6		
TP - F1Q- cell C7		
TP - F1Q- cell C8		
TP - F1Q- cell C9A		

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TP - F1Q- cell C10		
TP - F1Q- cell C11		
TP - F1Q- cell C12		
TP - F1Q- cell C13		
TP - F1Q- cell C13A		
TP - F1Q- cell E1		
TP - F1Q- cell E2		
TP - F1Q- cell E4		
TP - F1Q- cell E6		
TP - F1Q- cell E7		
TP - F1Q- cell E10		
TP - F1Q- cell E12		
TP – F2- General	<p>1. Future deterministic cash flows supposes the choice of a deterministic economic scenario for participating contracts (and also for inflation linked cash flows), but also the choice of a scenario for stochastically modelled claims, even in non participating contracts. We propose to use forward implied rates for economic scenarios, and “central scenario” for stochastic development of claims (for example reference mortality table with nil random when stochastic mortality is used).</p> <p>2. Recoverable from reinsurance may be nil in such a scenario (in case of out of the money reinsured guarantees)</p> <p>3. On the one hand, the period required is too long as most models end cash flows projections at 30 years. Discounting rates gives low materiality for the value of cash flows occurring after 30 years. On the other hand, all the insured persons don't die in the next 30 years and pensions contracts will last more than 30 years.</p> <p>4. Why does EIOPA need reinsurance recoverables split into so many categories, by LOB? There could be non-proportional treaties, and definitely SPV / Finite Reinsurances that cover more than one LOB. Requesting such splits not only causes</p>	

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	undue burden to companies, but also introduces high risk of spurious accuracy (or worse artificial allocations). We suggest removing this requirement split by LOBs (but only having it in total across all LOBs).	
TP – F2- Purpose	We don't follow EIOPA for the purpose of the template. If calculations are market consistent in life participating business, it is hard to say that "an overview of the future cash flows projection" is given by this template. Stochastic modelling is not a deterministic central scenario.	
TP – F2- Benefits	Reading in potential benefits that EIOPA wants to use this template for ALM analysis, we want to highlight that such an analysis can be very misleading, particularly for participating contracts. In a deterministic scenario, cash flows arising from a 4% guaranteed rate plus a 1% annual participation and cash flows arising from a 0% guaranteed rate plus a 5% annual participation may have very similar patterns. This similarity hides very different risks and needs for very different asset allocation. Again, this template gives only a central neutral risk scenario not "an overview of potential ALM issues". We don't see how the supervisors can assess "possible liquidity risk" with this template. Therefore, this template can be very actuarially misleading. Its removal can prevent this risk.	
TP – F2- Costs		
TP – F2- Groups	We don't see the value of adding central scenarios at a group level.	
TP – F2- Materiality		
TP – F2- Disclosure	This template should not be public since it is misleading (see the financial crisis where only (wrong) expectancies were considered).	

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TP – F2- Frequency	As quarterly reporting will usually be based on proxies directly on the result (average present value of stochastic projections), and not with complete generation of cash flows, this template should only be annual.	
TP – F2- Open issues		
TP - F2- cell A1	Although it may be actuarially interesting to split cash flows between future premiums, future benefits, future expenses, we don't see the need to report it in the QRT.	
TP - F2- cell C1	See A1	
TP - F2- cell D1	See A1	
TP - F2- cell F1	See A1	
TP - F2- cell G1	See A1	
TP - F2- cell AU1	See A1	
TP - F2- cell CU1	See A1	
TP - F2- cell DU1	See A1	
TP - F2- cell FU1	See A1	
TP - F2- cell GU1	See A1	
TP - F2- cell I1	See A1	
TP - F2- cell J1	See A1	
TP - F2- cell K1	See A1	
TP - F2- cell L1	See A1	
TP - F2- cell LU1	See A1	
TP - F2- cell M1	See A1	
TP - F2- cell N1	See A1	
TP - F2- cell O1	See A1	
TP - F2- cell P1	See A1	
TP - F2- cell PU1	See A1	
TP - F2- cell Q1	See A1	
TP - F2- cell R1	See A1	

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TP - F2- cell S1	See A1	
TP - F2- cell T1	See A1	
TP - F2- cell TU1	See A1	
TP - F2- cell U1	See A1	
TP - F2- cell CH1	See A1	
TP - F2- cell DH1	See A1	
TP - F2- cell FH1	See A1	
TP - F2- cell GH1	See A1	
TP - F2- cell A33	See A1	
TP - F2- cell A34	See A1	
TP - F2- cell A35	See A1	
TP – F3- General	<p>This sheet, including and especially the "Narrative", puts out some very onerous reporting (with regular updating) for companies. We recommend simplify the following requirements:</p> <p>a. Product denomination / HRG - this requires companies to split each product into each of its Homogeneous Risk Groups and LOBs. That is unrealistic and very onerous for some companies.</p> <p>One recommendation would be to have one line per Product denomination, and have a column listing the risks covered within the product, plus mapping into the main LOB. Alternate approach could be to have one line per risk grouping.</p> <p>b. Product classification ID - the definition of this cell seems to indicate that the approach suggested above (in "a.") was originally intended, but additional granularity was added on later.</p> <p>c. Country - we agree to list the countries, but not have a line for each country. Country should be underwriting country and not localisation of risk.</p>	

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	<p>d. Best Estimate (By HRG - merger of different cells) - it does not make sense to require this by HRG - reporting required is too onerous.</p> <p>In a financial reporting template, the split should rather be carried out according to the Homogeneous Risk Groups (HRG) used to assess the liabilities best estimate. This should not be done according to contractual or legal obligations which may not be coherent with the financial calculations carried out during the best estimate assessment and is probably inconsistent for those who use stochastic calculations for their best estimate valuation</p>	
TP – F3- Purpose	So as to make sure that the calculations carried out and information provided are consistent with one another and provide useful elements for the supervisory authority, the Homogenous Risk Group definition should be the same for this file, the actuarial report and the best estimate calculation.	
TP – F3- Benefits		
TP – F3- Costs		
TP – F3- Groups		
TP – F3- Materiality		
TP – F3- Disclosure	This file should not be publicly available due to its technical features. It could also provide very confidential and protected information on some insured contracts (especially professional groups' contracts).	
TP – F3- Frequency	This file should be set up on a yearly basis because BE are only calculated with accuracy on an annual basis.	
TP – F3- Open issues		
TP - F3- cell A2		
TP - F3- cell A2A		
TP - F3- cell A3		
TP - F3- cell A4		

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TP - F3- cell A5		
TP - F3- cell A6		
TP - F3- cell A7		
TP - F3- cell A8	Country (see F1 template) should be understood as the underwriting country.	
TP - F3- cell A9	The number of insured persons may not be available for life policies, only the number of policies may be available.	
TP - F3- cell A10	See A9	
TP - F3- cell A15		
TP - F3- cell A18		
TP - F3- cell A20		
TP - F3- cell A21	Cf. TP F3 General	
TP - F3- cell A24		
TP - F3- cell A26		
TP - F3- cell A30		
	Cf. TP F3 General. A short qualitative comment is better than a wrong average (5% for the next 10 years and 0% for the next 40 years is not 1% as an average sum-up).	
	We don't think that the calculation should be produced using no adverse assumptions about mortality. The mortality assumptions can't be limited to a central assumption (the mortality table). Stochastic modelling is also possible.	
TP - F3- cell A34		
TP - F3- cell A34A		
TP - F3- cell A35A	The average value may not be adapted to stochastic valuation.	
TP - F3- cell A36		
TP - F3- cell A41		
TP – F3A- General		
TP – F3A- Purpose		
TP – F3A- Benefits		

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TP – F3A- Costs		
TP – F3A- Groups		
TP – F3A- Materiality		
TP – F3A- Disclosure		
TP – F3A- Frequency		
TP – F3A- Open issues		
TP - F3A- cell A1		
TP - F3A- cell A2		
TP - F3A- cell A3		
TP - F3A- cell A4		
TP - F3A- cell A5		
TP - F3A- cell A6		
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		

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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		
TP – F4- Groups		
TP – F4- Materiality	Agreed	
TP – F4- Disclosure		
TP – F4- Frequency		
TP – F4- Open issues		
TP - F4- cell A1		
TP - F4- cell A2		
TP - F4- cell A3		
TP - F4- cell A4	The weighted average age of beneficiaries: it is the only place where an average age is asked. The accuracy of this information (because of the aggregation) will not be easy.	
TP - F4- cell B1	We don't see how an « annualized technical rate » can sum up the information about the interest rate curve and the stochastic modelling.	

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Pricing rate depends also of the pricing year. We don't see how the information sought could be efficiently used.

TP – E1 & E1Q- General

1. Line of Business Segmentation is mandated, yet option should be given to the undertakings to use a segmentation that is in line with their internal model:

- a. Some companies have established their own line of business definitions which are used within all of our processes, specifically for risk modelling (internal model) and risk management. These lines of business have been used for many years and offer good comparability. Forcing reporting to be based on a different segmentation adds unnecessary compliance burden, costs. It also introduces a disconnect between the quantitative risk assessment (in the internal model) and the underlying exposure to be reported, which limits the understanding of the risk figures. Technical Provisions can be adequately calculated using various different line of business splits without detracting from the quality of the results. It would seem most suitable to report technical provisions to the supervisory authorities in a way consistent with how the technical provisions have themselves been calculated and are used for risk management. Reporting based on a different split may mean that the numbers need to be allocated using spurious techniques which will likely cause confusion.
- b. The biggest problem with the lines of business is the split of health into Income Protection and medical expenses. Some companies split their Health into 'Accident' and 'Health (sickness)'. This is consistent with the split that was previously suggested by CEIOPS (now EIOPA). These lines of business do not map to the current lines used in the QRTs. Working around this problem would be very time consuming and does not add anything to the quality of the undertaking's reporting.
Also, workers compensation, MTPL and General liability insurance are in some countries (for example Belgium and Portugal and Finland) split between NL guarantees and SLT annuities. There remains a question over where they should be reported i.e. TP – F1 – A6; TP – F1 – A10 or TP – E1 – C1, D1, H1. Clarification from EIOPA would be helpful in this respect.

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- 2. Illiquidity premium (see below)**
- 3. We do not see the value added to splitting the business written into the direct/proportional reinsurance/non-proportional reinsurance segments.**
 - a. It is not clear that the provision of such splits will assist supervisory authorities in assessing if technical provisions are accurate. Some undertakings intend to fill these templates out centrally, having collated the data together from the various branches. The inclusion of such granular information in data systems does not provide any additional comfort with the technical provision numbers. To build in such additional fields is an expense that offers little value. We would welcome clarification as to how these fields will help form an opinion of whether the Technical Provisions are adequate?
- 4. We do not see a reason to split the reinsurance recoverables from reinsurance/SPV/finite reinsurance.**
 - a. Reinsurance is often arranged at a branch level covering many lines of business at once. For this reason, the allocation to line of business could only be approximate at best. Having to do this allocation three times for the three types of reinsurance is overly complex and adds nothing to the ability of a supervisor to assess the adequacy of technical provisions.
- 5. Cash out-flows separated into future benefits and future expenses and cash in-flows separated into future premiums, recoverables from salvage and subrogation, and other cash in-flows. (see below)**
- 6. The title should be changed to "Non-Life Technical Provisions". The term "Non-SLT Health" is redundant and misleading since according to the segmentation given in Level 2 obligations are labelled either as Non-Life or as Life obligations. Non-SLT Health is implicitly included in the former**
- 7. Miscellaneous**
 - a. It's challenging to answer the question "In case of simplified methods used,

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	<p>please indicate briefly the item used" whether the company has used several simplifications in sub-segments.</p> <p>b. The handling of preliminary reported annuities related e.g. WC and MTPL is open to interpretations. How about the handling of BE related to annuities, annuity IBNR?</p> <p>c. As regards Recoverables from reinsurance and SPV it is very important to clarify whether the table requires a segmentation or an allocation of those items. In case of proportional reinsurance these two would coincide. But in case of non-proportional reinsurance recoverables would be segmented into the 4 segments for non-proportional reinsurance only (in the table columns marked with (13) – (16)), whereas in allocation the choice of segment would be based on the segmentation of the underlying direct (or accepted re)insurance obligation.</p> <p>The preferred choice would be to use allocation instead of segmentation for the recoverables, because net best estimates by line of business are needed in the calculation of the reserve risk for Non-life and Health underwriting risk modules. This basis for segmentation has to be described in the LOG in order to achieve harmonised application of the table.</p>	
TP – E1 & E1Q - Purpose	<p>Purpose seems too high. The templates only give an overview of TP with a split between LOBs.</p> <p>It is hard and may be dangerous to say that the template enables the supervisor to better understand the valuation of TP and monitor risks through that template.</p>	
TP – E1 & E1Q - Benefits	<p>Potential benefits seem too extensive compared to the reality of the template which only gives an overlook of the technical provisions.</p> <p>It is not serious to say that, with this template, supervisors can say that "TP are adequate and their calculation complies with the principle of market consistency".</p>	
TP – E1 & E1Q - Costs		
TP – E1 & E1Q - Groups		

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TP – E1 & E1Q - Materiality	<ol style="list-style-type: none"> 1. We would welcome a clear definition of materiality thresholds related to splitting reinsurance between direct/proportional/non-proportional. Where there is no material amount of reinsurance written, all business should be grouped with the direct business. 2. We would welcome a clear definition of materiality thresholds related to splitting reinsurance between reinsurance/SPV/finite reinsurance. Where there is no material amount of recoveries from SPVs or finite reinsurance, all reinsurance recoveries should be grouped together. <p>B.1. We would like to see a materiality threshold related to cash in-flows for Premium Provisions. Where there is no material UPR related to premium that will not be earned in the next 12 months (i.e. from multi-year policies) is immaterial, the separate cashflows should not have to be considered.</p>	
TP – E1 & E1Q - Disclosure	We feel that only the information contained in the form “E1Q” should ever be disclosed publicly.	
TP – E1 & E1Q - Frequency	See General comment: if quarterly reporting remains, use of guidelines enabling proxies, no approval by ASMB.	
TP – E1 & E1Q - Open issues	<ol style="list-style-type: none"> 1. We feel that only the information contained in the form “E1Q” should ever be disclosed publicly. 2. From a macro-economic sector view, some companies would only be able to split our non-life technical provisions between Insurance Corporations, Households, and Rest of the World/Other. The assumptions would be that the counterparty for all reinsurance would be insurance companies, the counterparty for all personal lines of business would be households, and the counterparty for all commercial and corporate business would be Rest of the World/Other. The split into producing countries could be possible. No line of business split could be provided at these levels. Where the reinsurance is at a branch level, allocating reinsurance recoveries to individual lines can only ever be approximate at best. For this reason, a line of business split is thought to be 	

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	undesirable.	
TP - E1- cell A1		
TP - E1- cell B1		
TP - E1- cell C1		
TP - E1- cell D1		
TP - E1- cell E1		
TP - E1- cell F1		
TP - E1- cell G1		
TP - E1- cell H1		
TP - E1- cell I1		
TP - E1- cell J1		
TP - E1- cell K1		
TP - E1- cell L1		
TP - E1- cell M1		
TP - E1- cell N1		
TP - E1- cell O1		
TP - E1- cell P1		
TP - E1- cell A2		
TP - E1- cell A3		
TP - E1- cell R3		
TP - E1- cell M4		
TP - E1- cell R4		
TP - E1- cell A5		
TP - E1- cell S5		
TP - E1- cell A6		
TP - E1- cell S6		

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TP - E1- cell A7		
TP - E1- cell S7		
TP - E1- cell A8		
TP - E1- cell S8		
TP - E1- cell A9		
TP - E1- cell S9		
TP - E1- cell A10		
TP - E1- cell A11		
TP - E1- cell A12		
TP - E1- cell R12		
TP - E1- cell M13		
TP - E1- cell R13		
TP - E1- cell A14		
TP - E1- cell S14		
TP - E1- cell A15		
TP - E1- cell S15		
TP - E1- cell A16		
TP - E1- cell S16		
TP - E1- cell A17		
TP - E1- cell S17		
TP - E1- cell A18		
TP - E1- cell S18		
TP - E1- cell A19		
TP - E1- cell A20		
TP - E1- cell A21		
TP - E1- cell A22		

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TP - E1- cell A23		
TP - E1- cell A24		
TP - E1- cell A25		
	<p>Illiquidity premium</p> <p>The QRT should accommodate for cases where undertaking are based in 3rd countries with a Solvency II-equivalent supervisory regime (e.g. between Solvency II and the Swiss Solvency Test). Wherever possible, it is economical to use common processes for Solvency II and the equivalent 3rd country regime. The calculation of Technical Provisions will be highly comparable between the two regimes However, some difference may remain, e.g. as tithe discount rates used. Using SST as an example, no illiquidity premium is used for non-life technical provisions. Under Solvency II, a 50% illiquidity premium is used. This obviously will lead to different numbers, but the cost of providing complete governance and reporting around both sets of numbers is unnecessarily increasing the work load. We would propose allowing entities to report a different level of illiquidity premium as long as it is lower than what is prescribed in the specifications. Additionally, a total level adjustment would be reported at the end.</p>	
TP - E1- cell A26		
TP - E1- cell A27	See cell A26	
TP - E1- cell A28	See cell A26	
	<p>We don't see the actuarial value of knowing the number of HRG for the supervisor.</p> <p>We don't think that it is possible to answer No to the question "further segmentation into HRG". Lobs are too high level usually to enable a correct calculation of TP.</p>	
TP - E1- cell A29	Sometimes HRG is the policy itself.	
TP - E1- cell A30		
TP - E1- cell A31		
TP - E1- cell A32		
TP - E1- cell A33	Although it may be actuarially interesting to split best estimates between future premiums, future claim events, allocated and unallocated claims administration	

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	<p>expenses and ongoing administration of the in-force policies components, we don't see the need to report it in the QRT.</p> <p>We don't see the need to split best estimate cash flows out between salvage and subrogation.</p>	
TP - E1- cell A34	See cell A33	
TP - E1- cell A35	See cell A33	
TP - E1- cell A36	See cell A33	
TP - E1- cell A37	See cell A33	
TP - E1- cell A38	See cell A33	
TP - E1- cell A39	See cell A33	
TP - E1- cell A40	See cell A33	
TP - E1- cell A41	See cell A33	
TP - E1- cell A42	See cell A33	
TP - E1- cell A43	<ol style="list-style-type: none"> 1. This qualitative information should not be produced in a quantitative template but in the RSR and in the actuarial function report. It is not a good think to mix quantitative templates and qualitative information. 2. Whatever calculations are produced, a simplification is processed. It is the nature of modelling. Answering "Yes" will be usual. What is more important is to know if simplifications are acceptable and are breaking materiality policies. 3. Explaining Solvency 2 methods, assumptions, data, and calculations in quantitative cell is not serious. 	

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TP - E1- cell A44	See A43	
TP - E1- cell A45	See A43	
TP - E1- cell A46	<p>1. Illiquidity premium The QRT should accommodate for cases where undertaking are based in 3rd countries with a Solvency II-equivalent supervisory regime (e.g. between Solvency II and the Swiss Solvency Test). Wherever possible, it is economical to use common processes for Solvency II and the equivalent 3rd country regime. The calculation of Technical Provisions will be highly comparable between the two regimes However, some difference may remain, e.g. as to the discount rates used. Using SST as an example, no illiquidity premium is used for non-life technical provisions. Under Solvency II, a 50% illiquidity premium is used. This obviously will lead to different numbers, but the cost of providing complete governance and reporting around both sets of numbers is unnecessarily increasing the work load. We would propose allowing entities to report a different level of illiquidity premium as long as it is lower than what is prescribed in the specifications. Additionally, a total level adjustment would be reported at the end.</p> <p>2. Location of risks :</p> <p>For some risks, it is difficult to say the real location of risk: assistance (you can go for holidays in different countries), marine and transport, health LOBs for example. The underwriting place could be easier and more accurate.</p>	
	See comment cell A46	
TP - E1- cell A51		
TP - E1- cell A58	See comment cell A46	
TP - E1 Q- cell A1		
TP - E1 Q- cell B1		
TP - E1 Q- cell C1		
TP - E1 Q- cell D1		

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TP - E1 Q- cell E1		
TP - E1 Q- cell F1		
TP - E1 Q- cell G1		
TP - E1 Q- cell H1		
TP - E1 Q- cell I1		
TP - E1 Q- cell L1		
TP - E1 Q- cell M1		
TP - E1 Q- cell N1		
TP - E1 Q- cell O1		
TP - E1 Q- cell P1		
TP - E1 Q- cell Q1		
TP - E1 Q- cell R1		
TP - E1 Q- cell A2		
TP - E1 Q- cell B2		
TP - E1 Q- cell C2		
TP - E1 Q- cell D2		
TP - E1 Q- cell E2		
TP - E1 Q- cell F2		
TP - E1 Q- cell G2		
TP - E1 Q- cell H2		
TP - E1 Q- cell I2		
TP - E1 Q- cell L2		
TP - E1 Q- cell M2		
TP - E1 Q- cell N2		
TP - E1 Q- cell O2		
TP - E1 Q- cell P2		

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TP - E1 Q- cell Q2		
TP - E1 Q- cell R2		
TP - E1 Q- cell A3		
TP - E1 Q- cell B3		
TP - E1 Q- cell C3		
TP - E1 Q- cell D3		
TP - E1 Q- cell E3		
TP - E1 Q- cell F3		
TP - E1 Q- cell G3		
TP - E1 Q- cell H3		
TP - E1 Q- cell I3		
TP - E1 Q- cell L3		
TP - E1 Q- cell M3		
TP - E1 Q- cell N3		
TP - E1 Q- cell O3		
TP - E1 Q- cell P3		
TP - E1 Q- cell Q3		
TP - E1 Q- cell R3		
TP - E1 Q- cell A5		
TP - E1 Q- cell B5		
TP - E1 Q- cell C5		
TP - E1 Q- cell D5		
TP - E1 Q- cell E5		
TP - E1 Q- cell F5		
TP - E1 Q- cell G5		
TP - E1 Q- cell H5		

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TP - E1 Q- cell I5		
TP - E1 Q- cell L5		
TP - E1 Q- cell M5		
TP - E1 Q- cell N5		
TP - E1 Q- cell O5		
TP - E1 Q- cell P5		
TP - E1 Q- cell Q5		
TP - E1 Q- cell R5		
TP - E1 Q- cell A6		
TP - E1 Q- cell B6		
TP - E1 Q- cell C6		
TP - E1 Q- cell D6		
TP - E1 Q- cell E6		
TP - E1 Q- cell F6		
TP - E1 Q- cell G6		
TP - E1 Q- cell H6		
TP - E1 Q- cell I6		
TP - E1 Q- cell L6		
TP - E1 Q- cell M6		
TP - E1 Q- cell N6		
TP - E1 Q- cell O6		
TP - E1 Q- cell P6		
TP - E1 Q- cell Q6		
TP - E1 Q- cell R6		
TP - E1 Q- cell A10		
TP - E1 Q- cell B10		

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TP - E1 Q- cell C10		
TP - E1 Q- cell D10		
TP - E1 Q- cell E10		
TP - E1 Q- cell F10		
TP - E1 Q- cell G10		
TP - E1 Q- cell H10		
TP - E1 Q- cell I10		
TP - E1 Q- cell L10		
TP - E1 Q- cell M10		
TP - E1 Q- cell N10		
TP - E1 Q- cell O10		
TP - E1 Q- cell P10		
TP - E1 Q- cell Q10		
TP - E1 Q- cell R10		
TP – E2- General	The handling of preliminary and finalised reported annuities related e.g. WC and MTPL is open to interpretations. How about the handling of BE related to annuities, annuity IBNR? Is the interpretation regarding finalised annuities that they are included in Life? How about non-SLT Health? Could we suppose that included here?	
TP – E2- Purpose	We don't follow EIOPA for the purpose of the template. It is hard to say that "an overview of the future cash flows projection" is given by this template. You may use different approach to estimate Non life claim reserve: chain ladder, average amount...	
TP – E2- Benefits	Reading in potential benefits that EIOPA wants to use this template for ALM analysis, we want to highlight that such an analysis can be very misleading.	

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	We don't see how the supervisor can assess "possible liquidity risk" with this template. Therefore, this template can be very actuarially misleading. Its remove can prevent this risk.	
TP – E2- Costs		
TP – E2- Groups	We don't see the value of adding central scenarios at a group level.	
TP – E2- Materiality	We would welcome a materiality threshold related to cash in-flows for Premium Provisions. Where there is no material UPR related to premium that will not be earned in the next 12 months (i.e. from multi-year policies) is immaterial, the separate cashflows should not have to be considered.	
TP – E2- Disclosure		
TP – E2- Frequency		
TP – E2- Open issues		
	Problem 1a: Cash out-flows separated into future benefits and future expenses. Problem 1b: Cash in-flows separated into future premiums and other cash in-flows. Reasoning: In QIS 5 TP.2.44 it is stated that cash-flows from future premiums, future claim events, allocated and unallocated claims administration expenses, and ongoing administration of the in-force policies do not need to be calculated separately. As this level of granularity is not required in the calculation, it seems unreasonable to expect this level of granularity in the QRTs. While many companies may have these level of detail in their actuarial models for analyses purposes, it does not make sense to require QRT reporting at this level of granularity.	
TP - E2- cell A1		
TP - E2- cell B1	See A1	

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TP - E2- cell C1	See A1	
TP - E2- cell D1	See A1	
TP - E2- cell E1		
TP - E2- cell F1		
TP - E2- cell G1		
TP - E2- cell H1		
TP - E2- cell I1		
TP - E2- cell J1		
TP - E2- cell A31		
TP – E3- General	<p>A. 5 years could be enough for most LOBS</p> <p>B. Problem: Inflation Rates</p> <p>a. Reasoning: Within a Line of Business, different perils may be reserved using different techniques, some with inflation adjustments and others without. In cases such as this, an overall inflation rate by country and line of business would be difficult to calculate and would not add any value.</p> <p>1. Issue for Clarification: Historical data, on a Solvency II basis</p> <p>a. Description: We would welcome clarification on the comment that historical data at the first time application of Solvency II are not requested for claims provisions while they are requested for claims paid. Does this mean that the first time we fill out this form that we only need to provide claims paid triangles and single figures for the others?</p> <p>2. Open Issue: We would agree on the use of Option 1, business as usual. We believe that this is consistent with how reserves are produced and will be the most useful.</p> <p>a. Option 1:</p>	

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Benefits for the industry which the option generates: applied consistently with how reserves are produced
Benefits for the regulator: If the triangles are produced in the same way that reserves are calculated then this may make these triangles in some way suitable for assessing whether the technical provisions are calculated correctly.
Costs for the industry which the option generates (one-off/ongoing): least cost of the 3
Implications of option on insurers related to running business/material impact on market structures: should not change

b. Option 2:
Benefits for the industry which the option generates: None. There will also be issues if there are European countries outside of the EU.
Costs for the industry which the option generates (one-off/ongoing): significant - New management information data would need to be produced. This would likely require at least 7 days of work of one employee per country per company per line of business. In addition, checks would need to be made, which would add 2 days of work of one employee per country per company per line of business. There would also be additional time required to compile all of this data.
Implications of option on insurers related to running business/material impact on market structures: none - This would only be a new way of looking at the same information and in most cases business would be run the same as before. However, it may give supervisors a different and probably distorted view of the data.

c. Option 3:
Benefits for the industry which the option generates: none - There would also be issues where a legal entity consists of different countries with different imposed formats.
Costs for the industry which the option generates (one-off/ongoing): Costs similar to option 2 if national supervisors decide to change the imposed format.
Implications of option on insurers related to running business/material impact on market structures: none - This would only be a new way of looking at the same information and in most cases business would be run the same as before.

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3. Other comments:

We typically use AY for internal analysis and assessment of our LOBs. AY is quite standard for most lines of business sold outside of Lloyd's. Marine lines of business tend to be on UWY. Lloyd's use an UWY. Reinsurance is typically UWY. According to Level 2 "the provision for claims outstanding shall relate to claim events that have already occurred, regardless of whether the claims arising from these events have been reported or not" (TP17). There is no requirement to separate reported claims from unreported claims in the calculation, and several commonly used estimation techniques do not make this distinction. Therefore it may be impossible for some undertakings to fill the "Claims Outstanding" triangle. Filling the triangle on an approximation basis should not be required since it does not provide any useful value added. Also the terminology should be checked against that used in Levels 1 and 2.

As regards Recoveries received and Recoverables from reinsurance it is very important to clarify whether the table requires a segmentation or an allocation into lines of business. In case of proportional reinsurance these two would coincide. But in case of non-proportional reinsurance recoverables would be segmented into the 4 lines of business for non-proportional reinsurance, whereas in allocation the choice of segment would be based on the line of business of the underlying direct (or accepted re)insurance obligation.

The preferred choice would be to use segmentation instead of allocation for the recoveries and recoverables. This is because run-off triangles are used for the calculation of the Best Estimate. And according to Level 1 this calculation has to be performed at least by lines of business. Therefore allocation would not fulfil this requirement.

The basis for segmentation has to be described in the LOG in order to achieve harmonised application of the table

TP – E3- Purpose

TP – E3- Benefits

The primary potential benefit of this form is given as "supervisors need to have sufficiently granular data in order to assess if the provisioning is sufficient."

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	<p>We believe that this form is not a reliable means of determining the adequacy of the reserves. The split out of this data by currency and mandated Line of Business is not consistent with the way in which we reserve our business and does not capture subjective factors used in setting reserves.</p> <p>The supervisor may wish to consider alternative approaches to assessing the adequacy of reserve provisions such as relying on external audits.</p>	
TP – E3- Costs		
TP – E3- Groups	Clarifications is need about the cases where the legal entity is a small group of branches	
TP – E3- Materiality	We feel that the way that the materiality threshold set for information on currency is overly complicated. Only taking into account major currencies that make up to 90% of the TP makes this information useless for the purpose. How can supervisors get an idea of the sufficiency of the technical provisions if up to 10% of the data could be missing?	
TP – E3- Disclosure		
TP – E3- Frequency		
TP – E3- Open issues		
TP - E3- cell A00	<p>Problem: Line of Business Segmentation is mandated; not left to the insurer's discretion.</p> <p>Reasoning :</p> <p>A number of companies have established our own line of business definitions which are embedded within all of our processes. These lines of business have been used for many years and offer good comparability. Forcing reporting to be based on a different segmentation adds unnecessary expense. Technical Provisions can be adequately calculated using various different line of business splits without detracting from the</p>	

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	<p>quality of the results. It would seem most suitable to report technical provisions to the supervisory authorities in a way consistent with how the technical provisions have themselves been calculated. Reporting based on a different split may mean that the numbers need to be allocated using spurious techniques which will likely cause confusion</p>	
TP - E3- cell A01		
TP - E3- cell A02		
TP - E3- cell A03: N		
	<p>Problem: Requiring a split by currency could easily lead to supervisors drawing the wrong conclusions.</p> <p>Reasoning: The currency split is not at all consistent with how we reserve our business. Many different management views might be contained in one currency. A combined triangle would likely have many mix changes within it. This would make these triangles unsuitable for their purpose.</p>	
TP - E3- cell A04		
TP - E3- cell J0		
TP - E3- cell A1		
TP - E3- cell A2		
TP - E3- cell A3		
TP - E3- cell A4		
TP - E3- cell A5		
TP - E3- cell A6		
TP - E3- cell A7		
TP - E3- cell A8		

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TP - E3- cell A9		
TP - E3- cell A10		
TP - E3- cell L1		
TP - E3- cell U1		
TP - E3- cell A11	A number of companies have established our own line of business definitions which are embedded within all of our processes. These lines of business have been used for many years and offer good comparability. Forcing reporting to be based on a different segmentation adds unnecessary expense. Technical Provisions can be adequately calculated using various different line of business splits without detracting from the quality of the results. It would seem most suitable to report technical provisions to the supervisory authorities in a way consistent with how the technical provisions have themselves been calculated. Reporting based on a different split may mean that the numbers need to be allocated using spurious techniques which will likely cause confusion	
TP - E3- cell U11		
TP - E3- cell A21	<p>Problem: Reinsurance Recoveries Triangles</p> <p>Reasoning: Not universal technique to produce these figures in triangle format. Reinsurance is often arranged at a branch level covering many lines of business at once. For this reason, the allocation to line of business could only be approximate at best. We would like to exclude these triangles.</p>	
TP - E3- cell L21		
TP - E3- cell U21		
TP – E4- General	Fulfilling the proposed reporting requirements will be extremely onerous even if it is only required to be filled out for every combination of material currency and LOB. The table is based on the follow-up of individual claims. Such reporting would require that the claims provision are known for each claim. Filling the table would require either the use of case by case reserving or an allocation of the claims provisions to the	

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different columns of the table. However, several commonly used estimation techniques are based on aggregated data on homogeneous risk groups. There is no allocation of the resulting claims provision to the individual claims events. If such an allocation is made, the result of it would be highly questionable. Case by case is, on other hand, an approximation that can be used under certain conditions only. Therefore it may be impossible for several undertakings /lines of business to fill this table. The ex-post allocation of claims provisions at the beginning of the year to different columns based on the status of the claim at the end of the year (settled/not settled) is futile, arbitrary, and laborious and it does not convey any useful information. Therefore the costs of reporting would heavily outweigh the possible benefits.

Reporting of claims numbers would be possible but it would have its own drawbacks. There is no industry standard on claim numbers, e.g. one accident might be regarded as one claim, two claims (fire with damage to building and personal property) or many claims (several injured persons in an accident). This ambiguity would make reporting less meaningful.

The table is extremely time-consuming, and because of the deficiencies mentioned above, not very informative. No such data should be required that cannot be used for efficient supervision. The table should not be required as part of a harmonised reporting but should be left to national reporting

TP – E4- Purpose

TP – E4- Benefits

The primary potential benefit of this form is given as "supervisors need to have sufficiently granular data in order to assess if the provisioning is sufficient."

We believe that this form is not a reliable means of determining the adequacy of the reserves. The split out of this data by currency and mandated Line of Business is not consistent with the way in which we reserve our business and does not capture subjective factors used in setting reserves.

The supervisor may wish to consider alternative approaches to assessing the adequacy of reserve provisions such as relying on external audits.

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	<p>Assessing if the provisions are sufficient should be the goal of an audit. A loss ratio can be determined from data already contained in other areas of the QRTs. Average cost of claims may be an inconsistent metric as there is no standard definition of a claim.</p> <p>Speed in settlement of claims may be an inconsistent metric as there is no standard definition of a claim.</p> <p>We do not believe that additional insight can be gained by breakout at this level. The currency and LOB definitions are broad, potentially containing many management views within them, and the data required for each is at such a granular level.</p> <p>There is a real danger of mix changes within an LOB/Currency creating distortions leading to incorrect conclusions being drawn.</p>	
TP – E4- Costs		
TP – E4- Groups		
TP – E4- Materiality		
TP – E4- Disclosure		
TP – E4- Frequency		
TP – E4- Open issues	<p>Issue for Clarification: Definition of a Claim Description: There is no standard definition of a "claim." We would like further clarification as what is considered a claim for the purpose of this form.</p>	
TP - E4- cell A1		
TP - E4- cell B1		

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TP - E4- cell C1		
TP - E4- cell D1		
TP - E4- cell E1		
TP - E4- cell F1		
TP - E4- cell G1		
TP - E4- cell H1		
TP - E4- cell I1		
TP - E4- cell J1		
TP - E4- cell K1		
TP - E4- cell L1		
TP - E4- cell M1		
TP - E4- cell N1		
TP - E4- cell O1		
TP - E4- cell P1		
TP - E4- cell Q1		
TP - E4- cell R1		
TP - E4- cell S1		
TP - E4- cell T1		
TP - E4- cell A2		
TP - E4- cell A3		
TP - E4- cell A4		
TP - E4- cell A5		
TP - E4- cell A6		
TP - E4- cell A7		
TP - E4- cell A8		
TP - E4- cell A9		

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TP - E4- cell A10		
TP - E4- cell L11		
TP - E4- cell M11		
TP - E4- cell N11		
TP - E4- cell O11		
TP - E4- cell P11		
TP - E4- cell Q11		
TP – E5- General	Clarification needed in instructions in order to avoid wrong interpretations. Split between "Acquisition Expenses" and "Other Acquisition Expenses" might result in different interpretations. It should be considered to use the same split as in the IAD between "direct" and "indirect" acquisition costs.	
TP – E5- Purpose		
TP – E5- Benefits		
TP – E5- Costs		
TP – E5- Groups		
TP – E5- Materiality		
TP – E5- Disclosure		
TP – E5- Frequency		
TP – E5- Open issues		
TP - E5- cell B1		
TP - E5- cell D1		
TP - E5- cell E1		
TP - E5- cell A11		
TP - E5- cell B11		

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TP - E5- cell D11		
TP - E5- cell E11		
TP - E5- cell A21		
TP - E5- cell B21		
TP - E5- cell C21		
TP - E5- cell D21		
TP - E5- cell E21		
TP - E5- cell F21		
TP - E5- cell A31		
TP - E5- cell B31		
TP – E6- General	<p>It would be useful to collect information on the claims distribution. According to the LOG "incurred means the sum of gross paid and gross outstanding amounts for each claim". However, here we run into the same problem as with TP-E4.</p> <p>Such reporting would require that the claims provision are known for each claims event. Filling the table would require either the use of case by case reserving or an allocation of the claims provisions to the different claims events. However, several commonly used estimation techniques are based on aggregated data on homogeneous risk groups and there is no allocation of the resulting claims provision to the individual claims. If such an allocation is made, the result of it would be highly questionable. Case by case is, on other hand, an approximation that can be used under certain conditions only. Therefore it may be impossible for several undertakings /lines of business to fill this table</p>	
TP – E6- Purpose		
TP – E6- Benefits		
TP – E6- Costs		
TP – E6- Groups		

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TP – E6- Materiality		
TP – E6- Disclosure		
TP – E6- Frequency		
TP – E6- Open issues		
TP - E6 (old Re - J4A)- cell A00		
TP - E6 (old Re - J4A)- cell A1		
TP - E6 (old Re - J4A)- cell B1		
TP - E6 (old Re - J4A)- cell C1		
TP - E6 (old Re - J4A)- cell D1		
TP - E6 (old Re - J4A)- cell E1		
TP - E6 (old Re - J4A)- cell F1		
TP - E6 (old Re - J4A)- cell G1		
TP - E6 (old Re - J4A)- cell H1		
TP - E6 (old Re - J4A)- cell I1		
TP - E6 (old Re - J4A)- cell J1		
TP - E6 (old Re - J4A)- cell K1		
TP - E6 (old Re - J4A)- cell L1		

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TP – E7- General		
TP – E7- Purpose		
TP – E7- Benefits		
TP – E7- Costs		
TP – E7- Groups		
TP – E7- Materiality		
TP – E7- Disclosure		
TP – E7- Frequency		
TP – E7- Open issues		
TP - E7 (old Re - J4B)- cell A00		
TP - E7 (old Re - J4B)- cell A1		
TP - E7 (old Re - J4B)- cell B1		
TP - E7 (old Re - J4B)- cell C1		
TP - E7 (old Re - J4B)- cell D1		
TP - E7 (old Re - J4B)- cell E1		
TP - E7 (old Re - J4B)- cell F1		
TP - E7 (old Re - J4B)- cell G1		
TP - E7 (old Re - J4B)- cell H1		

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TP - E7 (old Re - J4B)- cell A01		
TP - E7 (old Re - J4B)- cell A11		
TP - E7 (old Re - J4B)- cell B11		
TP - E7 (old Re - J4B)- cell C11		
TP - E7 (old Re - J4B)- cell D11		
TP - E7 (old Re - J4B)- cell E11		
TP - E7 (old Re - J4B)- cell F11		
TP - E7 (old Re - J4B)- cell G11		
TP - E7 (old Re - J4B)- cell H11		
Re - J1- General		
Re - J1- Purpose		
Re - J1- Benefits		
Re - J1- Costs		
Re - J1- Groups		
Re - J1- Materiality		
Re - J1- Disclosure		
Re - J1- Frequency		
Re - J1- Open issues		

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Re - J1- cell A00		
Re - J1- cell A1		
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 A01		
Re - J1- cell A11		
Re - J1- cell B11		
Re - J1- cell C11		
Re - J1- cell D11		
Re - J1- cell E11		
Re - J1- cell F11		
Re - J1- cell G11		
Re - J1- cell H11		

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Re - J1- cell I11		
Re - J1- cell J11		
Re - J1- cell K11		
Re - J1- cell L11		
Re - J1- cell M11		
Re - J1- cell O11		
Re - J1- cell P11		
Re – J2- General		
Re – J2- Purpose		
Re – J2- Benefits		
Re – J2- Costs		
Re – J2- Groups		
Re – J2- Materiality		
Re – J2- Disclosure		
Re – J2- Frequency		
Re – J2- Open issues		
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		

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Re - J2- cell J1		
Re - J2- cell K1		
Re - J2- cell L1		
Re - J2- cell M1		
Re - J2- cell N1		
Re - J2- cell O1		
Re - J2- cell P1		
Re - J2- cell Q1		
Re - J2- cell R1		
Re - J2- cell S1		
Re - J2- cell T1		
Re - J2- cell U1		
Re - J2- cell V1		
Re - J2- cell W1		
Re - J2- cell X1		
Re - J2- cell Y1		
Re - J2- cell Z1		
Re - J2- cell AA1		
Re - J2- cell AB1		
Re - J2- cell AC1		
Re - J2- cell AD1		
Re - J2- cell AE1		
Re – J3- General		
Re – J3- Purpose		
Re – J3- Benefits		

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Re – J3- Costs		
Re – J3- Groups		
Re – J3- Materiality		
Re – J3- Disclosure		
Re – J3- Frequency		
Re – J3- Open issues		
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		
Re - J3- cell M1		
Re - J3- cell N1		
Re - J3- cell O1		
SPV - General		
SPV - Purpose		
SPV - Benefits		
SPV - Costs		

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SPV - Groups		
SPV - Materiality		
SPV - Disclosure		
SPV - Frequency		
SPV - Open issues		
SPV- cell A1		
SPV- cell B1		
SPV- cell C1		
SPV- cell D1		
SPV- cell E1		
SPV- cell F1		
SPV- cell G1		
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		

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SPV- cell V1		
SPV- cell W1		
SPV- cell X1		
SPV- cell Y1		
SPV- cell Z1		
SPV- cell AA1		
SPV- cell AB1		
SPV- cell AC1		
SPV- cell AD1		
SPV- cell AE1		
G01-Purpose		
G01-Benefits		
G01-Costs		
G01-Application		
G01-Materiality		
G01-Disclosure		
G01-Frequency		
G01-Open issues		
G01- cell A1		
G01- cell B1		
G01- cell C1		
G01- cell D1		
G01- cell E1		
G01- cell F1		
G01- cell G1		
G01- cell H1		

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G01- cell I1		
G01- cell J1		
G01- cell K1		
G01- cell L1		
G01- cell M1		
G01- cell N1		
G01- cell O1		
G01- cell P1		
G01- cell Q1		
G01- cell R1		
G01- cell S1		
G01- cell T1		
G01- cell U1		
G03 & G04-Purpose		
G03 & G04-Benefits		
G03 & G04-Costs		
G03 & G04-Application		
G03 & G04-Materiality		
G03 & G04-Disclosure		
G03 & G04-Frequency		
G03 & G04-Open issues		
G03- cell A1		
G03- cell B1		
G03- cell C1		
G03- cell D1		
G03- cell E1		

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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		
G03- cell Q1		
G03- cell R1		
G04- cell A1		
G04- cell B1		
G04- cell C1		
G04- cell D1		
G04- cell E1		
G10-Purpose		
G10-Benefits		
G10-Costs		
G10-Application		
G10-Materiality		
G10-Disclosure		
G10-Frequency		
G10-Open issues		

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G10- cell A1		
G10- cell A2		
G10- cell A3		
G10- cell A4		
G10- cell A5		
G10- cell A6		
G14-Purpose		
G14-Benefits		
G14-Costs		
G14-Application		
G14-Materiality		
G14-Disclosure		
G14-Frequency		
G14-Open issues		
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		

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G14- cell M1		
G14- cell N1		
G14- cell O1		
G14- cell P1		
G14- cell Q1		
G14- cell R1		
G14- cell S1		
G14- cell T1		
G14- cell U1		
G14- cell V1		
G14- cell W1		
G14- cell X1		
G14- cell Y1		
G14- cell Z1		
G15-Purpose		
G15-Benefits		
G15-Costs		
G15-Application		
G15-Materiality		
G15-Disclosure		
G15-Frequency		
G15-Open issues		
G15- cell A1		
G15- cell B1		
G15- cell C1		
G15- cell D1		

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G15- cell E1		
G15- cell F1		
G15- cell G1		
G15- cell H1		
G15- cell I1		
G15- cell J1		
G15- cell K1		
G15- cell L1		
G15- cell M1		
G20-Purpose		
G20-Benefits		
G20-Costs		
G20-Application		
G20-Materiality		
G20-Disclosure		
G20-Frequency		
G20-Open issues		
G20- cell A1		
G20- cell B1		
G20- cell C1		
G20- cell D1		
G20- cell E1		
G20- cell F1		
G20- cell I1		
G20- cell J1		
G30-Purpose		

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G30-Benefits		
G30-Costs		
G30-Application		
G30-Materiality		
G30-Disclosure		
G30-Frequency		
G30-Open issues		
G30- cell A1		
G30- cell A2		
G30- cell A3		
G30- cell A4		
G30- cell A5		
G30- cell A6		
G30- cell A7		
G30- cell A8		
G30- cell A9		
G30- cell A10		
G30- cell A11		
G30- cell B1		
G30- cell B2		
G30- cell B3		
G30- cell B4		
G30- cell B5		
G30- cell B6		
G30- cell B7		
G30- cell B8		

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G30- cell C1		
G30- cell C2		
G30- cell C3		
G30- cell C4		
G30- cell D1		
G30- cell D2		
G30- cell D3		
G30- cell D4		
G30- cell D5		
G30- cell D6		
G30- cell D7		
G30- cell D8		
G30- cell D9		
G30- cell E1		
G30- cell E2		
G30- cell E3		
G30- cell E4		
G30- cell E5		
G30- cell E6		
G30- cell E7		
G30- cell E8		
G30- cell E9		
G30- cell F1		
G30- cell F2		
G30- cell F3		
G30- cell F4		

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G30- cell F5		
G30- cell F6		
G30- cell F7		
G30- cell F8		
G30- cell F9		
G30- cell F10		
G30- cell F11		
G30- cell F12		
IGT1 to IGT6-Purpose		
IGT1 to IGT6-Benefits		
IGT1 to IGT6-Costs		
IGT1 to IGT6-Application		
IGT1 to IGT6-Materiality		
IGT1 to IGT6-Disclosure		
IGT1 to IGT6-Frequency		
IGT1 to IGT6-Open issues		
IGT1- cell B6		
IGT1- cell C6		
IGT1- cell D6		
IGT1- cell E6		
IGT1- cell F6		
IGT1- cell G6		
IGT1- cell H6		
IGT1- cell I6		
IGT1- cell J6		
IGT1- cell K6		

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IGT1- cell L6		
IGT2- cell B6		
IGT2- cell C6		
IGT2- cell D6		
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		
IGT3- cell B6		
IGT3- cell C6		
IGT3- cell D6		
IGT3- cell E6		
IGT3- cell F6		
IGT3- cell G6		
IGT3- cell H6		
IGT3- cell I6		

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IGT3- cell J6		
IGT4- cell B6		
IGT4- cell C6		
IGT4- cell D6		
IGT4- cell E6		
IGT4- cell F6		
IGT4- cell G6		
IGT4- cell H6		
IGT4- cell I6		
IGT4- cell J6		
IGT4- cell K6		
IGT5- cell B5		
IGT5- cell C5		
IGT5- cell D5		
IGT5- cell E5		
IGT5- cell F5		
IGT5- cell G5		
IGT5- cell H5		
IGT5- cell I5		
IGT5- cell J5		
IGT5- cell K5		
IGT5- cell L5		
IGT5- cell M5		
IGT5- cell N5		
IGT5- cell O5		
IGT5- cell P5		

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IGT5- cell Q5		
IGT5- cell R5		
IGT5- cell S5		
IGT5- cell T5		
IGT5- cell U5		
IGT5- cell V5		
IGT5- cell W5		
IGT5- cell X5		
IGT5- cell Y5		
IGT5- cell Z5		
IGT5- cell AA5		
IGT5- cell AB5		
IGT5- cell AC5		
IGT5- cell AD5		
IGT5- cell AE5		
IGT6- cell B5		
IGT6- cell C5		
IGT6- cell D5		
IGT6- cell E5		
IGT6- cell F5		
IGT6- cell G5		
IGT6- cell H5		
IGT6- cell I5		
IGT6- cell J5		
IGT6- cell K5		
IGT6- cell L5		

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IGT6- cell M5		
IGT6- cell N5		
IGT6- cell O5		
IGT6- cell P5		
IGT6- cell Q5		
IGT6- cell R5		
IGT6- cell S5		
IGT6- cell T5		
IGT6- cell U5		
IGT6- cell V5		
IGT6- cell W5		
IGT6- cell X5		
IGT6- cell Y5		
IGT6- cell Z5		
IGT6- cell AA5		
IGT6- cell AB5		
IGT6- cell AC5		
IGT6- cell AD5		
IGT6- cell AE5		
IGT6- cell AF5		
IGT6- cell AG5		
IGT6- cell AH5		
IGT6- cell AI5		
IGT6- cell AJ5		
IGT6- cell AK5		
RC-Purpose		

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RC-Benefits		
RC-Costs		
RC-Application		
RC-Materiality		
RC-Disclosure		
RC-Frequency		
RC-Open issues		
RC- cell A2		
RC- cell A3		
RC- cell A4		
RC- cell A5		
RC- cell A6		
RC- cell A7		
RC- cell A8		
RC- cell A9		
RC- cell A10		
RC- cell A11		
RC- cell A12		
RC- cell A13		
RC- cell A14		
RC- cell A15		
RC- cell A16		
RC- cell A17		