

Questions	Comments
3	As the assumptions used in the calculation of the data produced by S&P are unclear, it is difficult to determine whether the proposal is appropriate or not. However, if the data is based on historical default and recovery rates, etc., we do not see any particular need to change the current proposal.
4	The current level of granularity is adequate.
12	We would ask supervisors to understand that as some insurers do not have the requested data, and it would be unduly burdensome to calculate it solely for this purpose, they may not be able to report.
13	RE.1.b: In light of the aim of the metrics, which is to measure "reliance on reinsurance", one option would be to exclude cessions to reinsurance pools, which is mandated by jurisdictional regulations. However, the feasibility of providing the relevant data has not yet been considered.
19	We would ask supervisors to understand that it is not feasible to report data on the new proposed item as some insurers do not have the requested data and would face an unduly burden of calculating it solely for this purpose.
25	<p>With respect to each of the IIM data items to be assessed in the proposed ancillary risk indicators, we ask supervisors to understand that some items (including those on which we have not specifically commented) may be difficult to provide as some insurers do not have the relevant data, and it would be unduly burdensome to calculate it solely for this purpose.</p> <p>The use of ancillary risk indicators should take into account the fact that there are data items that are not reportable in the underlying IIM Data Collection, or that are reported based on interpretation or proxy by insurers. We would like to see the technical specifications improved by clarifying the definition of each item and providing more examples of assets covered in order to minimise interpretation errors by insurers in IIM Data Collection, and to make the reported figures more consistent.</p>