

# IAIS Consultations

Print view of your comments on "Consultation on ICPs 9 and 10 and ComFrame material integrated with ICPs 9 and 10 (Public version)" - Date: 01.06.2017, Time: 22:51

<b>Organisation</b>	International Actuarial Association
<b>Jurisdiction</b>	International
<b>Role</b>	Other (not IAIS Member)
<b>Other Roles</b>	Not Potential IAIG
<b>Email</b>	amali.seneviratne@actuaries.org
<b>Phone</b>	+1-613-236-0886 (Ext:116)
<b>Treat my comments as confidential</b>	No

Question	
	Q1 General Comment on ICP 9
<b>Answer</b>	<p>The re-written contents of ICP 9 are well organized and read much better than the current version.</p> <p>In general, the ComFrame additions seem appropriate and well placed.</p> <p>The IAIS consultation does a much better job than previously of defining the roles of “involved supervisors”, “other involved supervisors”, “group-wide supervisors”, “head of insurance group” etc. The consultation clearly defines the need for IAIG’s to be supervised at the head of group level, which for IAIG’s includes a non-insurance holding company. It is clear from the ICP introductory remarks that ICP’s are to be applied in the supervision of insurance groups that are headed by an insurance legal entity. Unfortunately, this results in a standards cliff, at the group level, since the head of an insurance group which is a non-insurance holding company is not subject to IAIS standards unless it is an IAIG.</p> <p>ICP 9.1.15 only partially addresses this cliff by stating “Although the supervisor may not have the power to conduct supervisory review and reporting of non-regulated entities, it should assess, at a minimum, the potential adverse impact on the insurer of such non-regulated entities”.</p> <p>In additions, despite the importance of Control Functions as laid out in ICP 8, ICP 9 references to Control Functions and their importance as part of supervisory review are relatively few, appearing in the Annex and in the CF9.6a.2. The word “control” does appear frequently in the ICP but not with the specific meaning intended by ICP 8.</p>
	Q2 General Comment on ComFrame material integrated with ICP 9
<b>Answer</b>	<p>ComFrame requirements are included in the Introduction – We think they would fit better in a separate section.</p> <p>In general we regard the integration as successful. However, note our answer to Q34 for removing some inconsistencies.</p>
	Q3 Comment on Introductory Guidance ICP 9.0.1
<b>Answer</b>	
	Q4 Comment on Introductory Guidance ICP 9.0.2
<b>Answer</b>	

Q5 Comment on Standard CF9.0a

**Answer**

ComFrame requirements are included in the Introduction – We think they would fit better as a separate section

Q6 Standard CF9.0a

Does the IAIG currently fulfil the requirements of the standard? If “No” or “Partially”, what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame? Single Choice Question.

**Answer**

Q7 Standard CF9.0a

What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q6 that would have to be made solely for purposes of ComFrame (please specify the currency)?

**Answer**

Q8 Standard CF9.0a

What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q6 that would have to be made solely for purposes of ComFrame (please specify the currency)?

**Answer**

Q9 Standard CF9.0a

Please provide the assumptions made to estimate the one-time costs (Q7) and the ongoing costs per year (Q8).

**Answer**

Q10 Standard CF9.0a

Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).

**Answer**

Q11 Comment on Standard CF9.0b

**Answer**

Q12 Standard CF9.0b

Does the IAIG currently fulfil the requirements of the standard? If “No” or “Partially”, what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame? Single Choice Question.

**Answer**

Q13 Standard CF9.0b

What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q12 that would have to be made solely for purposes of ComFrame (please specify the currency)?

<b>Answer</b>	<input type="text"/>
	Q14 Standard CF9.0b What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q12 that would have to be made solely for purposes of ComFrame (please specify the currency)?
<b>Answer</b>	<input type="text"/>
	Q15 Standard CF9.0b Please provide the assumptions made to estimate the one-time costs (Q13) and the ongoing costs per year (Q14).
<b>Answer</b>	<input type="text"/>
	Q16 Standard CF9.0b Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).
<b>Answer</b>	<input type="text"/>
	Q17 Comment on Standard ICP 9.1
<b>Answer</b>	<input type="text"/>
	Q18 Comment on Guidance ICP 9.1.1
<b>Answer</b>	<input type="text"/>
	Q19 Comment on Guidance ICP 9.1.2
<b>Answer</b>	<input type="text"/>
	Q20 Comment on Guidance ICP 9.1.3
<b>Answer</b>	<input type="text"/>
	Q21 Comment on Guidance ICP 9.1.4
<b>Answer</b>	<input type="text"/>
	Q22 Comment on Guidance ICP 9.1.5
<b>Answer</b>	<input type="text"/>
	Q23 Comment on Guidance ICP 9.1.6
<b>Answer</b>	<input type="text"/>
	Q24 Comment on Guidance ICP 9.1.7
<b>Answer</b>	<input type="text"/>
	Q25 Comment on Guidance ICP 9.1.8
<b>Answer</b>	<input type="text"/>

Q26 Comment on Guidance ICP 9.1.9

**Answer**

Q27 Comment on Guidance ICP 9.1.10

**Answer**

Q28 Comment on Guidance ICP 9.1.11

**Answer**

Q29 Comment on Guidance ICP 9.1.12

**Answer**

Q30 Comment on Guidance ICP 9.1.13

**Answer**

Q31 Comment on Guidance ICP 9.1.14

**Answer**

Q32 Comment on Guidance ICP 9.1.15

**Answer**

Q33 Comment on Guidance ICP 9.1.16

**Answer**

Q34 Comment on Standard ICP 9.2

**Answer**

The section on ICP 9.2 and the integrated ComFrame text seem to have a different focus resulting in inconsistent parts of the text. The main topic in Section 9.2 is the supervisory plan the part on IAIGs, but (ComFrame 9.2) is focused on risk assessment. Risk assessment is not addressed otherwise in 9.2. .

Q35 Comment on Guidance ICP 9.2.1

**Answer**

Q36 Comment on Guidance ICP 9.2.2

**Answer**

Q37 Comment on Guidance ICP 9.2.3

**Answer**

Q38 Comment on Standard CF9.2a

**Answer**

Q39 Standard CF9.2a  
Does the IAIG currently fulfil the requirements of the standard? If “No” or “Partially”, what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame?

Answer

Q40 Standard CF9.2a  
What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q39 that would have to be made solely for purposes of ComFrame (please specify the currency)?

Answer

Q41 Standard CF9.2a  
What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q39 that would have to be made solely for purposes of ComFrame (please specify the currency)?

Answer

Q42 Standard CF9.2a  
Please provide the assumptions made to estimate the one-time costs (Q40) and the ongoing costs per year (Q41).

Answer

Q43 Standard CF9.2a  
Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).

Answer

Q44 Comment on Guidance CF9.2a.1

Answer

Q45 Comment on Guidance CF9.2a.2

Answer

Q46 Comment on Guidance CF9.2a.3

Answer

Q47 Comment on Guidance CF9.2a.4

Answer

Q48 Comment on Guidance CF9.2a.5

Answer

Q49 Comment on Standard CF9.2b

Answer

Q50 Standard CF9.2b  
Does the IAIG currently fulfil the requirements of the standard? If “No” or “Partially”, what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame?

**Answer**

Q51 Standard CF9.2b  
What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q50 that would have to be made solely for purposes of ComFrame (please specify the currency)?

**Answer**

Q52 Standard CF9.2b  
What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q50 that would have to be made solely for purposes of ComFrame (please specify the currency)?

**Answer**

Q53 Standard CF9.2b  
Please provide the assumptions made to estimate the one-time costs (Q51) and the ongoing costs per year (Q52).

**Answer**

Q54 Standard CF9.2b  
Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).

**Answer**

Q55 Comment on Guidance CF9.2b.1

**Answer**

Q56 Comment on Guidance CF9.2b.2

**Answer**

Q57 Comment on Guidance CF9.2b.3

**Answer**

Q58 Comment on Guidance CF9.2b.4

**Answer**

Q59 Comment on Guidance CF9.2b.5

**Answer**

Q60 Comment on Guidance CF9.2b.6

**Answer**

Q61 Comment on Guidance CF9.2b.7

<b>Answer</b>	<input type="text"/>
	Q62 Comment on Standard ICP 9.3
<b>Answer</b>	<input type="text"/>
	Q63 Comment on Guidance ICP 9.3.1
<b>Answer</b>	<input type="text"/>
	Q64 Comment on Guidance ICP 9.3.2
<b>Answer</b>	<input type="text"/>
	Q65 Comment on Guidance ICP 9.3.3
<b>Answer</b>	<input type="text"/>
	Q66 Comment on Standard ICP 9.4
<b>Answer</b>	<input type="text"/>
	Q67 Comment on Guidance ICP 9.4.1
<b>Answer</b>	<input type="text"/>
	Q68 Comment on Guidance ICP 9.4.2
<b>Answer</b>	<input type="text"/>
	Q69 Comment on Guidance ICP 9.4.3
<b>Answer</b>	<input type="text"/>
	Q70 Comment on Guidance ICP 9.4.4
<b>Answer</b>	<input type="text"/>
	Q71 Comment on Guidance ICP 9.4.5
<b>Answer</b>	<input type="text"/>
	Q72 Comment on Guidance ICP 9.4.6
<b>Answer</b>	<input type="text"/>
	Q73 Comment on Guidance ICP 9.1.7
<b>Answer</b>	<input type="text"/>
	Q74 Comment on Guidance ICP 9.4.8
<b>Answer</b>	<input type="text"/>
	Q75 Comment on Guidance ICP 9.4.9
<b>Answer</b>	<input type="text"/>
	Q76 Comment on Guidance ICP 9.4.10

<b>Answer</b>	
	Q77 Comment on Guidance ICP 9.4.11
<b>Answer</b>	
	Q78 Comment on Guidance ICP 9.1.12
<b>Answer</b>	
	Q79 Comment on Guidance ICP 9.4.13
<b>Answer</b>	
	Q80 Comment on Guidance ICP 9.4.14
<b>Answer</b>	
	Q81 Comment on Guidance ICP 9.4.15
<b>Answer</b>	
	Q82 Comment on Guidance ICP 9.4.16
<b>Answer</b>	
	Q83 Comment on Standard CF9.4a
<b>Answer</b>	
	Q84 Standard CF9.4a Does the IAIG currently fulfil the requirements of the standard? If “No” or “Partially”, what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame?
<b>Answer</b>	
	Q85 Standard CF9.4a What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q84 that would have to be made solely for purposes of ComFrame (please specify the currency)?
<b>Answer</b>	
	Q86 Standard CF9.4a What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q84 that would have to be made solely for purposes of ComFrame (please specify the currency)?
<b>Answer</b>	
	Q87 Standard CF9.4a Please provide the assumptions made to estimate the one-time costs (Q85) and the ongoing costs per year (Q86).
<b>Answer</b>	



Q88 Standard CF9.4a  
Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).

**Answer**

Q89 Comment on Standard ICP 9.5

**Answer**

Q90 Comment on Guidance ICP 9.5.1

**Answer**

Q91 Comment on Guidance ICP 9.5.2

**Answer**

Q92 Comment on Guidance ICP 9.5.3

**Answer**

Q93 Comment on Guidance ICP 9.5.4

**Answer**

Q94 Comment on Guidance ICP 9.5.5

**Answer**

Q95 Comment on Standard ICP 9.6

**Answer**

Q96 Comment on Guidance ICP 9.6.1

**Answer**

Q97 Comment on Guidance ICP 9.6.2

**Answer**

Q98 Comment on Guidance ICP 9.6.3

**Answer**

Q99 Comment on Guidance ICP 9.6.4

**Answer**

Q100 Comment on Guidance ICP 9.6.5

**Answer**

Q101 Comment on Guidance ICP 9.6.6

**Answer**

Q102 Comment on Guidance ICP 9.6.7

<b>Answer</b>	<input type="text"/>
	Q103 Comment on Guidance ICP 9.6.8
<b>Answer</b>	<input type="text"/>
	Q104 Comment on Standard CF9.6a
<b>Answer</b>	<input type="text"/>
	Q105 Standard CF9.6a Does the IAIG currently fulfil the requirements of the standard? If “No” or “Partially”, what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame?
<b>Answer</b>	<input type="text"/>
	Q106 Standard CF9.6a What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q105 that would have to be made solely for purposes of ComFrame (please specify the currency)?
<b>Answer</b>	<input type="text"/>
	Q107 Standard CF9.6a What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q105 that would have to be made solely for purposes of ComFrame (please specify the currency)?
<b>Answer</b>	<input type="text"/>
	Q108 Standard CF9.6a Please provide the assumptions made to estimate the one-time costs (Q106) and the ongoing costs per year (Q107).
<b>Answer</b>	<input type="text"/>
	Q109 Standard CF9.6a Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).
<b>Answer</b>	<input type="text"/>
	Q110 Comment on Guidance CF9.6a.1
<b>Answer</b>	<input type="text"/>
	Q111 Comment on Guidance CF9.6a.2
<b>Answer</b>	<input type="text"/>
	Q112 Comment on Guidance CF9.6a.3
<b>Answer</b>	<input type="text"/>
	Q113 Comment on Standard CF9.6b
<b>Answer</b>	<input type="text"/>

Q114 Standard CF9.6b  
Does the IAIG currently fulfil the requirements of the standard? If “No” or “Partially”, what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame?

**Answer**

Q115 Standard CF9.6b  
What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q114 that would have to be made solely for purposes of ComFrame (please specify the currency)?

**Answer**

Q116 Standard CF9.6b  
What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q114 that would have to be made solely for purposes of ComFrame (please specify the currency)?

**Answer**

Q117 Standard CF9.6b  
Please provide the assumptions made to estimate the one-time costs (Q115) and the ongoing costs per year (Q116).

**Answer**

Q118 Standard CF9.6b  
Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).

**Answer**

Q119 Comment on Guidance CF9.6b.1

**Answer**

Q120 Comment on Guidance CF9.6b.2

**Answer**

Q121 Comment on Standard ICP 9.7

**Answer**

Q122 Comment on Guidance ICP 9.7.1

**Answer**

Q123 Comment on Guidance ICP 9.7.2

**Answer**

Q124 Comment on Standard CF9.7a

**Answer**

Q125 Standard CF9.7a  
Does the IAIG currently fulfil the requirements of the standard? If “No” or “Partially”, what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame?

Answer

Q126 Standard CF9.7a  
What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q125 that would have to be made solely for purposes of ComFrame (please specify the currency)?

Answer

Q127 Standard CF9.7a  
What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q125 that would have to be made solely for purposes of ComFrame (please specify the currency)?

Answer

Q128 Standard CF9.7a  
Please provide the assumptions made to estimate the one-time costs (Q126) and the ongoing costs per year (Q127).

Answer

Q129 Standard CF9.7a  
Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).

Answer

Q130 Comment on Annex to ICP 9

Answer

Q131 General Comment on ICP 10

Answer

The re-written contents of ICP 9 are well organized and read much better than the current version.

In general, the ComFrame additions seem appropriate and well placed.

Q132 General Comment on ComFrame material integrated with ICP 10

Answer

ComFrame requirements are included in the Introduction – We think they would fit better as a separate section? In general we regard the integration as successful. However, note our response to Q182 where we suggest restructuring section 10.3D

Q133 Comment on Introductory Guidance ICP 10.0.1

Answer

Q134 Comment on Introductory Guidance ICP 10.0.2

Answer

Q135 Comment on Introductory Guidance ICP 10.0.3

Answer

Q136 Comment on Introductory Guidance ICP 10.0.4

Answer

Q137 Comment on Introductory Guidance ICP 10.0.5

Answer

Q138 Comment on Introductory Guidance ICP 10.0.6

Answer

Q139 Comment on Introductory Guidance ICP 10.0.7

Answer

Q140 Comment on Standard CF10.0a

Answer

Q141 Standard CF10.0a

The IAIS considers it important for IAIGs that the group-wide supervisor can hold the Head of the IAIG accountable for meeting standards which apply to the group as a whole, even where the Head of the IAIG is an unregulated financial holding company.

The draft ComFrame standard CF10.0a provides that “supervisory measures” must be available, but does not specify a minimum set of such supervisory measures which should be available to the group-wide supervisor to take. Examples of some supervisory measures are provided as guidance in ICP 10.2.5, including requiring an increase in capital, but, as guidance, these measures do not have to be available.

- Should the ComFrame standard refer to any specific measures which must be available to the group-wide supervisor to apply directly to the Head of the IAIG?
- If yes, what measures should be referred to in the standard?

Answer

Q142 Standard CF10.0a

Does the IAIG currently fulfil the requirements of the standard? If “No” or “Partially”, what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame?

Answer

Q143 Standard CF10.0a

What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q142 that would have to be made solely for purposes of ComFrame (please specify the currency)?

Answer

Q144 Standard CF10.0a

What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q142 that would have to be made solely for purposes of ComFrame (please specify the currency)?

Answer

Q145 Standard CF10.0a  
Please provide the assumptions made to estimate the one-time costs (Q143) and the ongoing costs per year (Q144).

Answer

Q146 Standard CF10.0a  
Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).

Answer

Q147 Comment on Guidance CF10.0a.1

Answer

Q148 Comment on Guidance CF10.0a.2

Answer

Q149 Comment on Standard CF10.0b

Answer

Q150 Standard CF10.0b  
Does the IAIG currently fulfil the requirements of the standard? If "No" or "Partially", what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame?

Answer

Q151 Standard CF10.0b  
What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q150 that would have to be made solely for purposes of ComFrame (please specify the currency)?

Answer

Q152 Standard CF10.0b  
What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q150 that would have to be made solely for purposes of ComFrame (please specify the currency)?

Answer

Q153 Standard CF10.0b  
Please provide the assumptions made to estimate the one-time costs (Q151) and the ongoing costs per year (Q152).

Answer

Q154 Standard CF10.0b  
Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).

Answer

Q155 Comment on Guidance CF10.0b.1

**Answer**

Q156 Comment on Guidance CF10.0b.2

**Answer**

Q157 Comment on Guidance CF10.0b.3

**Answer**

Q158 Comment on Guidance CF10.0b.4

**Answer**

Q159 Comment on Guidance CF10.0b.5

**Answer**

Q160 Comment on Guidance CF10.0b.6

**Answer**

Q161 Comment on Standard ICP 10.1

**Answer**

Q162 Comment on Guidance ICP 10.1.1

**Answer**

Q163 Comment on Guidance ICP 10.1.2

**Answer**

Q164 Comment on Standard ICP 10.2

**Answer**

Q165 Comment on Guidance ICP 10.2.1

**Answer**

Q165 Comment on Guidance ICP 10.2.1

**Answer**

Q166 Comment on Guidance ICP 10.2.2

**Answer**

Q167 Comment on Guidance ICP 10.2.3

**Answer**

Q168 Comment on Guidance ICP 10.2.4

**Answer**

Q169 Comment on Guidance ICP 10.2.5

<b>Answer</b>	<input type="text"/>
	Q170 Comment on Guidance ICP 10.2.6
<b>Answer</b>	<input type="text"/>
	Q171 Comment on Guidance ICP 10.2.7
<b>Answer</b>	<input type="text"/>
	Q172 Comment on Guidance ICP 10.2.8
<b>Answer</b>	<input type="text"/>
	Q173 Comment on Standard CF10.2a
<b>Answer</b>	<input type="text"/>
	Q174 Standard CF10.2a Does the IAIG currently fulfil the requirements of the standard? If “No” or “Partially”, what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame?
<b>Answer</b>	<input type="text"/>
	Q175 Standard CF10.2a What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q174 that would have to be made solely for purposes of ComFrame (please specify the currency)?
<b>Answer</b>	<input type="text"/>
	Q176 Standard CF10.2a What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q174 that would have to be made solely for purposes of ComFrame (please specify the currency)?
<b>Answer</b>	<input type="text"/>
	Q177 Standard CF10.2a Please provide the assumptions made to estimate the one-time costs (Q175) and the ongoing costs per year (Q176).
<b>Answer</b>	<input type="text"/>
	Q178 Standard CF10.2a Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).
<b>Answer</b>	<input type="text"/>
	Q179 Comment on Guidance CF10.2a.1
<b>Answer</b>	<input type="text"/>
	Q180 Comment on Guidance CF10.2a.2
<b>Answer</b>	<input type="text"/>



Q181 Comment on Guidance CF10.2a.3

**Answer**

Q182 Comment on Standard ICP 10.3

**Answer**

The structure of the section on recovery plans could be improved by addressing the following topics in subsections:  
- roles and responsibilities of supervisor and insurer - recovery process - recovery plan requirements

Q183 Comment on Guidance ICP 10.3.1

**Answer**

Q183 Comment on Guidance ICP 10.3.1

**Answer**

Q184 Comment on Guidance ICP 10.3.2

**Answer**

Q185 Comment on Guidance ICP 10.3.3

**Answer**

Q186 Comment on Guidance ICP 10.3.4

**Answer**

Q187 Comment on Guidance ICP 10.3.5

**Answer**

Q188 Comment on Standard CF10.3a

**Answer**

We observe that the text on IAIGs gives detailed guidance on elements of recovery plans, while the text related to all insurers does not. It could be beneficial to clarify which elements relate specifically to IAIGs.

Q189 Standard CF10.3a

Does the IAIG currently fulfil the requirements of the standard? If "No" or "Partially", what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame?

**Answer**

Q190 Standard CF10.3a

What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q189 that would have to be made solely for purposes of ComFrame (please specify the currency)?

**Answer**

Q191 Standard CF10.3a  
What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q189 that would have to be made solely for purposes of ComFrame (please specify the currency)?

**Answer**

Q192 Standard CF10.3a  
Please provide the assumptions made to estimate the one-time costs (Q190) and the ongoing costs per year (Q191).

**Answer**

Q193 Standard CF10.3a  
Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).

**Answer**

Q194 Comment on Guidance CF10.3a.1

**Answer**

Q195 Comment on Guidance CF10.3a.2

**Answer**

Q196 Comment on Guidance CF10.3a.3

**Answer**

Q197 Comment on Guidance CF10.3a.4

**Answer**

Q198 Comment on Guidance CF10.3a.5

**Answer**

Q199 Comment on Guidance CF10.3a.6

**Answer**

Q200 Comment on Guidance CF10.3a.7

**Answer**

Q201 Comment on Guidance CF10.3a.8

**Answer**

Q202 Comment on Guidance CF10.3a.9

**Answer**

Q203 Comment on Guidance CF10.3a.10

**Answer**

Q204 Comment on Standard CF10.3b

Answer

Q205 Standard CF10.3b  
Does the IAIG currently fulfil the requirements of the standard? If “No” or “Partially”, what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame?

Answer

Q206 Standard CF10.3b  
What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q205 that would have to be made solely for purposes of ComFrame (please specify the currency)?

Answer

Q207 Standard CF10.3b  
What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q205 that would have to be made solely for purposes of ComFrame (please specify the currency)?

Answer

Q208 Standard CF10.3b  
Please provide the assumptions made to estimate the one-time costs (Q206) and the ongoing costs per year (Q207).

Answer

Q209 Standard CF10.3b  
Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).

Answer

Q210 Comment on Guidance CF10.3b.1

Answer

Q211 Comment on Standard ICP 10.4

Answer

Q212 Comment on Guidance ICP 10.4.1

Answer

Q213 Comment on Guidance ICP 10.4.2

Answer

Q214 Comment on Guidance ICP 10.4.3

Answer

Q215 Comment on Guidance ICP 10.4.4

<b>Answer</b>	<input type="text"/>
	Q216 Comment on Guidance ICP 10.4.5
<b>Answer</b>	<input type="text"/>
	Q217 Comment on Standard ICP 10.5
<b>Answer</b>	<input type="text"/>
	Q218 Comment on Guidance ICP 10.5.1
<b>Answer</b>	<input type="text"/>
	Q219 Comment on Guidance ICP 10.5.2
<b>Answer</b>	<input type="text"/>
	Q220 Comment on Guidance ICP 10.5.3
<b>Answer</b>	<input type="text"/>
	Q221 Comment on Standard CF10.5a
<b>Answer</b>	<input type="text"/>
	Q222 Standard CF10.5a Does the IAIG currently fulfil the requirements of the standard? If “No” or “Partially”, what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame?
<b>Answer</b>	<input type="text"/>
	Q223 Standard CF10.5a What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q222 that would have to be made solely for purposes of ComFrame (please specify the currency)?
<b>Answer</b>	<input type="text"/>
	Q224 Standard CF10.5a What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q222 that would have to be made solely for purposes of ComFrame (please specify the currency)?
<b>Answer</b>	<input type="text"/>
	Q225 Standard CF10.5a Please provide the assumptions made to estimate the one-time costs (Q223) and the ongoing costs per year (Q224).
<b>Answer</b>	<input type="text"/>
	Q226 Standard CF10.5a Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).
<b>Answer</b>	<input type="text"/>

Q227 Comment on Standard CF10.5b

**Answer**

Q228 Standard CF10.5b  
Does the IAIG currently fulfil the requirements of the standard? If “No” or “Partially”, what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame?

**Answer**

Q229 Standard CF10.5b  
What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q228 that would have to be made solely for purposes of ComFrame (please specify the currency)?

**Answer**

Q230 Standard CF10.5b  
What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q228 that would have to be made solely for purposes of ComFrame (please specify the currency)?

**Answer**

Q231 Standard CF10.5b  
Please provide the assumptions made to estimate the one-time costs (Q229) and the ongoing costs per year (Q230).

**Answer**

Q232 Standard CF10.5b  
Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).

**Answer**

Q233 Comment on Standard ICP 10.6

**Answer**

Q234 Comment on Guidance ICP 10.6.1

**Answer**

Q235 Comment on Guidance ICP 10.6.2

**Answer**

Q236 Comment on Guidance ICP 10.6.3

**Answer**

Q237 Comment on Guidance ICP 10.6.4

**Answer**

Q238 Comment on Guidance ICP 10.6.5

<b>Answer</b>	<input type="text"/>
	Q239 Comment on Guidance ICP 10.6.6
<b>Answer</b>	<input type="text"/>
	Q240 Comment on Guidance ICP 10.6.7
<b>Answer</b>	<input type="text"/>
	Q241 Comment on Guidance ICP 10.6.8
<b>Answer</b>	<input type="text"/>
	Q242 Comment on Guidance ICP 10.6.9
<b>Answer</b>	<input type="text"/>
	Q243 Comment on Guidance ICP 10.6.10
<b>Answer</b>	<input type="text"/>
	Q244 Comment on Standard CF10.6a
<b>Answer</b>	<input type="text"/>
	Q245 Standard CF10.6a Does the IAIG currently fulfil the requirements of the standard? If “No” or “Partially”, what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame?
<b>Answer</b>	<input type="text"/>
	Q246 Standard CF10.6a What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q245 that would have to be made solely for purposes of ComFrame (please specify the currency)?
<b>Answer</b>	<input type="text"/>
	Q247 Standard CF10.6a What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q245 that would have to be made solely for purposes of ComFrame (please specify the currency)?
<b>Answer</b>	<input type="text"/>
	Q248 Standard CF10.6a Please provide the assumptions made to estimate the one-time costs (Q246) and the ongoing costs per year (Q247).
<b>Answer</b>	<input type="text"/>
	Q249 Standard CF10.6a Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).
<b>Answer</b>	<input type="text"/>

Q250 Comment on Guidance CF10.6a.1

**Answer**

Q251 Comment on Guidance CF10.6a.2

**Answer**

Q252 Comment on Guidance CF10.6a.3

**Answer**

Q253 Comment on Standard CF10.6b

**Answer**

Q254 Standard CF10.6b  
Does the IAIG currently fulfil the requirements of the standard? If “No” or “Partially”, what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame?

**Answer**

Q255 Standard CF10.6b  
What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q254 that would have to be made solely for purposes of ComFrame (please specify the currency)?

**Answer**

Q256 Standard CF10.6b  
What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q254 that would have to be made solely for purposes of ComFrame (please specify the currency)?

**Answer**

Q257 Standard CF10.6b  
Please provide the assumptions made to estimate the one-time costs (Q255) and the ongoing costs per year (Q256).

**Answer**

Q258 Standard CF10.6b  
Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).

**Answer**

Q259 Comment on Guidance CF10.6b.1

**Answer**