10th Dec 2003

**Comment Letters**

CL 1 Financial Reporting Standards Board (FRSB) (New Zealand)
CL 1A -- *Additional comments*
CL 2 Holcim Group Ltd (Switzerland)
CL 3 Organismo Italiano di Contabilità (OIC) (Italy)
CL 4 Skandia (Sweden)
CL 5 Life Insurance Actuarial Standards Board (Australia) [*comments on AASB ED122*]
CL 6 Swiss Insurance Association (Switzerland)
CL 7 Malaysian Accounting Standards Board (Malaysia)
CL 8 Aviva Plc (UK)
CL 9 Holiday, Susan (UK)
CL 10 Syngenta International (Switzerland)
CL 11 Accounting Standards Board of Japan (Japan)
CL 12 Forum of European Insurers
CL 13 F Hoffmann-La Roche (Switzerland)
CL 14 Abbott, William (UK)
CL 15 Groupe Consultatif Européen
CL 16 Verband der Versicherungsunternehmen Österreichs (Austria)
CL 17 Santam Ltd (South Africa)
CL 18 Institute of Chartered Accountants in Ireland (Ireland)
CL 19 Littlejohn Frazer Chartered Accountants (UK)
CL 20 Association of European Cooperative and Mutual Insurers (ACME) (Belgium)
CL 21 Actuarial Profession, The (UK)
CL 22 Insurance Council of Australia (Australia)
CL 23 Fédération Française des Sociétés d'Assurances (FFSA) (France)
CL 24 van Rees, Herman (The Netherlands)
CL 25 Federal Financial Supervisory Authority - BaFin (Germany)
CL 27 Swedish Insurance Federation (Sweden)
CL 28 Danish Insurance Association (Denmark)
CL 29 Foreningen af Statsautoriserede Revisorer (FSR) (Denmark)
CL 30 Swedish Financial Accounting Standards Council (Sweden)
CL 31 British Bankers' Association (BBA) (UK)
CL 32 Nationwide Building Society (UK)
CL 33 Accounting Standards Board (ASB) (UK)
CL 34 Royal Association of Belgian Actuaries (Belgium)
CL 35 Conseil National de la Comptabilité CNC (France)
CL 36 Association of Financial Guaranty Insurers (USA)
CL 37 Industrie-Holding (Switzerland)
CL 38 International Accounting Standards Working Group (IASWG) of the National Association of Insurance Commissioners (NAIC) (USA)
CL 39 Taiyo Life Insurance Company (Japan)
CL 40  Federation of Finnish Insurance Companies (Finland)
CL 41  General Insurance Association of Japan (Japan)
CL 42  Institute of Actuaries of Japan (IAJ) (Japan)
CL 43  BHP Billiton (Australia)
CL 44  Nippon Life Insurance Company (Japan)
CL 45  Asahi Mutual Life Insurance Company (Japan)
CL 46  Dai-ichi Mutual Life Insurance Company (Japan)
CL 47  Fukoku Mutual Life Insurance Company (Japan)
CL 48  Marillion (Russia)
CL 49  Life Insurance Association of Japan (Japan)
CL 50  Swedish Society of Actuaries (Sweden)
CL 51  Council on Corporate Disclosure and Governance (CCDG) (Singapore)
CL 52  Treuhand-Kammer (Switzerland)
CL 53  UK 100 Group (UK)
CL 54  Actuarial Association of Austria (Austria)
CL 55  Masahiro Hoshino (Japan)
CL 56  German Actuarial Society (Germany)
CL 57  Meiji Life Insurance Company (Japan)
CL 58  Sumitomo Life Insurance Company (Japan)
CL 59  Raad voor de Jaarverslaggeving (Council for Annual Reporting) (Netherlands)
CL 60  Deloitte (International)
CL 61  Chamber of Auditors of the Czech Republic
CL 62  Mitsui Mutual Life Insurance Association (Japan)
CL 63  Istituto per la Vigilanza sulle Assicurazioni private e di Interesse Collettivo (ISVAP) (Italian Supervisory Authority) (Italy)
CL 64  Comité Européen des Assurances
CL 65  Australian Accounting Standards Board (AASB) (Australia)
CL 66  Yasuda Life Insurance Company (Japan)
CL 67  Danish Bankers Association (Denmark)
CL 68  Instituto de Contabilidad y Auditoria de Cuentas (Spain)
CL 69  German Insurance Association (Germany)
CL 70  Time & Tide Shipping (UK)
CL 71  Association of British Insurers (UK)
CL 72  American Council of Life Insurers (US)

*Additional information provided by the American Council of Life Insurers and the International Actuarial Association (CL 107)*

ACLI/IAA – first report on joint project (10 March 2003)

ACLI/IAA – second report on joint project (3 June 2003)

ACLI/IAA – final supplement to second report on joint project (Revised - August 2003)

Memorandum from Paul McCrossan concerning the supplement [CL 72C] (August 2003)

CL 73  South African Institute of Chartered Accountants (South Africa)
CL 74  [Joint Response]

American Council of Life Insurers
Austrian Insurance Association
German Insurance Association
Life Insurance Association of Japan
National Association of Independent Insurers (USA)
National Association of Mutual Insurance Companies (USA)
Reinsurance Association of America

CL 75  Lloyd’s (UK)
CL 76  Allianz AG (Germany)
CL 77  Estonian Financial Supervisory Authority (Estonia)
CL 78  Standard Life Assurance Company (UK)
CL 79  European Financial Reporting Advisory Group (EFRAG)
CL 80  Financial Services Authority (Finansinspektionen) (Sweden)

CL 80A  -- Additional comments

CL 81  Co-operative Insurance Society Limited (CIS) (UK)
CL 82  Norsk RegnskapsStiftelse - Norwegian Accounting Standards Board (Norway)
CL 83  Institute of Chartered Accountants in & Wales (UK)
CL 84  Royal & Sun Alliance (UK)
CL 85  RAC Plc (UK)
CL 86  Danish Financial Supervisory Authority (Denmark)
CL 87  Kredittilsynet (Norway)
CL 88  UBS (Switzerland)
CL 89  London Investment Banking Association (LIBA) (UK)
CL 90  Society of Actuaries in Ireland (Ireland)
CL 91  Swiss Re (Switzerland)
CL 92  American Academy of Actuaries (US)
CL 93  Hepp, John, University of Wisconsin at Madison (US)
CL 94  Novartis International AG (Switzerland)
CL 95  New Zealand Securities Commission (New Zealand)
CL 96  Australian Accountants & Actuaries Liaison Committee (Australia)
CL 97  Institute of Certified Public Accountants in Israel (ICPAI) (Israel)
CL 98  Basel Committee on Banking Supervision
CL 99  Institute of Actuaries of Australia (IAAust) (Australia)
CL 100  Japanese Institute of Certified Public Accountants (JICPA) (Japan)
CL 101  Gecalux Group (Luxembourg)
CL 102  Föreningen Auktoriserade Revisorer FAR (Sweden)
CL 103  PricewaterhouseCoopers (International)
CL 104  KPMG International
CL 105  South African Insurance Association (South Africa)
(NB – the attachment to this letter was also submitted as an appendix to CL 73)

CL 106  WestLB AG (Germany)
CL 107  [Draft] International Actuarial Association (IAA)
CL 108  Association for Investment Management and Research (AIMR)
CL 109  [Joint Response]
Association pour la participation des entreprises françaises à l'harmonisation comptable internationale (ACTEO)
Mouvement des Entreprises de France (France)

CL 110  Institut der Wirtschaftsprüfer (IDW) (Germany)
CL 111  Hong Kong Society of Accountants (Hong Kong)
CL 112  International Association of Insurance Supervisors (IAIS)

CL 113  [Joint Response]
Canadian Institute of Actuaries (CIA)
Canadian Life and Health Insurance Association (CLHIA)
Canadian Life and Health Insurance Compensation Corporation (CompCorp)
Insurance Accounting Task Force of the Canadian Accounting Standards Board
Insurance Bureau of Canada (IBC)
Office of the Superintendent of Financial Institutions (OSFI)

CL 114  International Organization of Securities Commissions (IOSCO)
CL 115  Legal & General Group plc (UK)
CL 116  New York State Society of Certified Public Accountants (NYSSCPA) (USA)
CL 117  European Banking Federation (EBF) & the European Savings Banks Group (ESBG)
CL 118  Prudential (UK)
CL 119  Zurich Financial Services (Switzerland)
CL 120  Société Générale (France)
CL 121  Swiss Life (Switzerland)
CL 122  Old Mutual (UK)
CL 123  Amlin (UK)
CL 124  Ernst & Young (International)
CL 125  Association of Dutch Insurers (Netherlands)
CL 126  Swiss Association of Actuaries (Switzerland)
CL 127  Abbey (UK)
CL 128  Dutch Health Insurers (Netherlands)
CL 129  Arias Actuarios S.L.
CL 130  German Accounting Standards Committee (DRSC) (Germany)
CL 131  London Society of Chartered Accountants (LSCA) (UK)
CL 132  Fédération des Experts Comptables Européens (FEE)
CL 133  Accounting Standards Executive Committee (AcSEC) of the American Institute of
        Certified Public Accountants (USA)