

**Member and Observer Comments on IAIS Draft paper:
Application Paper on Information Gathering and Analysis
Draft, May 2010**

Comments due by 9 August 2010

Name	Section or paragraph reference	Comment	Resolution (for use of the Secretariat only)
GNAIE, PCI, AIA	165	<p>We would like to suggest that the last sentence of section 165 be deleted. That sentence reads, "The insurance supervisory authorities shall also establish a reliable claims database that assist insurers and supervisors."</p> <p>Industry developed databases have proven to be efficient and effective. In jurisdictions in which such databases exist, there is no need for such databases to be operated by supervisors.</p> <p>Since industry databases work well, we do not believe supervisors in all jurisdictions should be encouraged to establish separate data bases, which could be quite wasteful when well-run industry databases exist.</p> <p>We agree with the proceeding sentence in the section, "Thus the collection of claims information through cooperation of insurers should be encouraged."</p>	