

Questions	Comments
1	<p>We support the supervisory reporting requirements outlined in CF 9.4, as they systematically organize the reporting framework necessary following ICS adoption, and clarify the information required for supervisors to assess capital adequacy and risk profiles of IAIGs. As stated in the ICP Introduction under "Proportionality and risk-based supervision", we would like to confirm that supervisory reporting is indeed based on the principle of proportionality.</p>
6	<p>Regarding the second sentence of the guidance, "More frequent regular reporting could also be required to enable effective supervision". To make it clear that more frequent regular reporting does not necessarily enable effective supervision, and that it should be determined based on the circumstances of each jurisdiction, we propose the following revision:</p> <p>If appropriate, more frequent regular reporting could also be required to enable effective supervision.</p>
40	<p>We appreciate the systematic organization of ICS-related information as public disclosure and its alignment with supervisory reporting (CF 9.4). As stated in the ICP introduction under "Proportionality and risk-based supervision," we would like to confirm that public disclosure is based on the principle of proportionality. Furthermore, we expect appropriate implementation that balances the usefulness for supervisory purposes against the practical burden, and considers the treatment of proprietary and confidential information as defined in ICP 20.0.11 and 20.0.12, to ensure that overly detailed disclosure is not uniformly required.</p>
68	<p>We appreciate your understanding that disclosing detailed information regarding the specifications of the internal models may be difficult in some cases, as certain aspects constitute confidential business information. While ICP 20.0.11 and 20.0.12 state that an appropriate balance should be struck between protecting proprietary and confidential information and making meaningful disclosures, we would like to confirm that these provisions also apply to this matter.</p>
71	<p>For consistency with CF 9.4.h, we propose revising "the IAIG" to "the Head of the IAIG".</p>