

In addition to comments made during the public hearing, we have one further suggestion in response to Q15 of the consultation document which relates to the documentation of extensions and changes:

In light of the expected large volume of model changes to be submitted to competent authorities by some larger firms, it may be advantageous to include in the documentation requirements a unique reference number for each change / extension application to facilitate tracking. This would prove particularly helpful where multiple applications for changes / extensions are submitted for the same rating system, or with the same date, or if change / extension requests are re-submitted with updates, etc.

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