

**Comments on draft SNA chapter:
Chapter 17: Cross-cutting and other special issues
Deadline for comments: 1 September 2007
Send comments to: sna@un.org**

Your name:	Mohd Uzir Mahidin
Your country/organization:	MALAYSIA
Contact (e.g. email address):	uzir@stats.gov.my
Submission date:	Aug,29,2007

This three-part template allows you to record your comments on draft chapter 17 easily and, at the same time, makes it easy for us to use your comments in considering revisions to the draft chapter. You may complete any one, any two, or all of the three parts of the template.

There is no file comparing existing text with draft text for this chapter because the draft is all new text.

Save this template and send it as an attachment to the following e-mail address:
sna@un.org

Part I: General comments

In the space below, please provide any general comments, such as about the clarity with which the new recommendations were incorporated (30 words or less).

Comment:

<p>The new chapter has a wider explanation especially on emerging issues such as insurance and financial services. We hope clearer example could be provided using numerical examples or tables. On sub-let issues, it seem too good in manual but in practice it is questionable to get actual data..</p>
--

Part II: Comments on specific draft paragraphs or passages

In your review of draft chapter 17, you may wish to devote particular attention to the passages listed below. For ease of reference, we have identified the relevant paragraphs. For each passage, a Word table is provided for you to use in making your comments. There is a row for general comments at the top of the table. Thereafter please use a separate row for each paragraph on which you wish to make detailed comments.

Chapter 17, Part 1: The treatment of insurance and social insurance other than pensions
 Part 1 is based loosely on annex IV of the 1993 SNA, but includes several passages that introduce changes. Some of these are identified below.

1. A refined treatment of non-life insurance is introduced in paragraphs 17.37-17.39 to prevent the variation in claims made each year from affecting output. A different treatment is permissible when the claims are exceptionally large and beyond expectation (17.50). Are these paragraphs clear?

General comment	We believe that application of adjusted claim is not suitable in the calculation of insurance output due to lack of data especially on the monthly and quarterly basis
17.37	Definition on adjusted claim is clear.
17.37 - 17.46	1. Technical guidance in the calculation of adjusted claims is not provided in this draft. 2. Its getting too complicated for National Accountants to estimated adjusted claim figures as before this used claim or benefits due as recorded in the Profit and Loss Account of the insurance companies.
17.47 - 17.48	1. The relationship between actual premium, net premium and premium supplements should put in diagram or numerical table for better understanding. 2. Usage of net premiums is not stated in this draft.
17.49 - 17.51	1. The time period for calculation of adjusted claims is not stated clearly. This will effect preliminary, revised and final estimates (especially if the numbers is too huge and significant, will effect GDP).

* Insert rows in this Word table for each paragraph on which you wish to comment.

2. The simplification in the SNA whereby direct insurance and reinsurance transactions were consolidated was seen to be causing errors especially in countries where all reinsurance was carried out with non-resident corporations (as is often the case). Is the description of how and why to treat direct insurance and reinsurance separately sufficiently clear (paragraphs 17.54-17.60)?

General comment	The description is not clear. Further explanation using numerical example should be provided.
17.54 - 17.60	We foresee problems in calculating the output of direct insurance and reinsurance simply because of estimating reinsurance separately.
*	Click here and start typing.

* Insert rows in this Word table for each paragraph on which you wish to comment.

3. A treatment for annuities as a form of life insurance is introduced in Rev. 1. This is desirable in itself and because it is how regular payments in retirement under defined contribution pensions are recorded. Paragraphs 17.90-17.97 describe this treatment. Are the paragraphs clear?

General comment	The paragraphs is clear. For countries that do not have annuities product, please provide further explanation using numerical example through technical notes or annexed.
17.90	
*	Click here and start typing.

* Insert rows in this Word table for each paragraph on which you wish to comment.

Chapter 17, Part 2: The treatment of loan guarantees in the System

Rev. 1 distinguishes three classes of loan guarantees. The first is composed of those guarantees provided by means of a financial derivative (described in chapter 11). The second is composed of the sorts of guarantees where large numbers of very similar guarantees are issued. Another is described as one-off guarantees, where each guarantee is tailored to specific circumstances.

4. The second class is called standardized loan guarantees. A treatment of such guarantees is introduced in paragraphs 17.106-17.111. It resembles the treatment of insurance in several respects. Is the description clear and comprehensive?

General comment	
17.106	Click here and start typing.
17.108	Need further clarification. and some numerical example especially on individual guarantee.

* Insert rows in this Word table for each paragraph on which you wish to comment.

Chapter 17, Part 3: The treatment of pensions in the System

Part 3 describes the treatment of pensions. It does so in some detail, in part because the means by which pensions are provided to persons in retirement varies considerably from country to country.

5. Rev. 1 incorporates a number of changes in the treatment of defined benefit pension schemes. After distinguishing between defined benefit and defined contribution schemes in paragraphs 17.141-17.146, the text describes the transactions recorded for a defined benefit scheme and provides a numerical example. This text begins in paragraph 17.147 and continues through paragraph 17.166. Is the text clear and comprehensive?

General comment	It hardly to find the way “imputed” parts should be estimated or calculated.
17.147	1. The employers’ imputed pension contributions part is not clearly define.

--	--

* Insert rows in this Word table for each paragraph on which you wish to comment.

6. Paragraphs 17.183-17.193 describe the proposed supplementary table that gives flexibility to countries not to include all liabilities for pensions in the main accounts while still providing the information for analysts. Is the table clear?

General comment	In general we satisfied with text
17.183	Click here and start typing.
*	Click here and start typing.
Table 17.10	Need more explanation about table in term of connectivity and relationship with the other accounts. The difference between liabilities appear and do not appear in the core national accounts need further clarification.

* Insert rows in this Word table for each paragraph on which you wish to comment.

Chapter 17, Part 4: The recording of flows associated with financial assets and liabilities
Part 4 describes the flows associated with financial assets and liabilities more extensively than in annex III of the 1993 SNA text, including the services associated with them.

7. The introduction, paragraphs 17.194-17.204, provides an overview of financial services that is wider than the traditional view of financial intermediation as applied to only deposits and loans. Is this wider perspective on financial services comprehensive and is the material presented in a helpful manner?

General comment	In general, wider explanation in this new chapter improve understanding on how to record flow of financial assets and liabilities. We hope this chapter can be reviewed with subject to a new definition of financial services that will be taken in chapter 6
17.194	Click here and start typing.
*	Click here and start typing.

* Insert rows in this Word table for each paragraph on which you wish to comment.

8. A new table summarizing the types of flows that relate to each instrument is given in table 17.11, which is introduced in paragraph 17.205. Is this table helpful?

17.205	Click here and start typing.
Table 17.11	Yes. The table is very helpful

* Insert rows in this Word table for each paragraph on which you wish to comment.

Chapter 17, Part 5: Contracts, leases and licences

The 1993 SNA did not have a comprehensive, coherent discussion of contracts, leases and licences. Part 5 brings together the material on the subject discussed under several of the 44 agreed Update issues.

9. Paragraphs 17.261-17.269 describes the three kinds of leases, including a description of resource leases, which are introduced in Rev. 1 in paragraph 2.269. Is the description of resource leases clear? Is the greater clarification of the distinction between operating and financial lease clear?

General comment	We suggest there would has specification of the asset that can be lease e.g transport equipment rather than being general explanation The clarification to distinguish financial and operating lease are quite clear.
17.261	Clear explanation.
17.269	We need an example or two of a natural resources with an infinite life and there is no consumption of fixed capital to make the sentence more clear.

* Insert rows in this Word table for each paragraph on which you wish to comment.

10. Paragraphs 17.301-17.305 describe how to record in balance sheets the benefits for each party corresponding to a shared asset. Are these paragraphs clear?

General comment	Need further clarification especially from off-shore activities It seem
17.301	Click here and start typing.
*	Click here and start typing.

* Insert rows in this Word table for each paragraph on which you wish to comment.

11. Paragraphs 17.306-17.311 describe the treatment of permissions to undertake a specific activity. Is it clear when a permit is to be treated as a tax and when it can simultaneously become an asset?

General comment	The explanation when a permit is to be treated as a tax and at the same time become an asset is not really clear. Need an example of the situation.
17.306	Click here and start typing.
17.309	The confusion about the situation of a permit/ being an asset when licensee realize this by on-selling (is it reselling a permit by licensee to another party?)

	We believe some clarification and example in numerical is needed.
--	---

* Insert rows in this Word table for each paragraph on which you wish to comment.

Part III. Other specific comments

You are welcome to make other comments. Please do so by using Adobe Acrobat Version 6 or 7 to comment directly on the PDF of the draft chapter.

If you don't have Adobe Acrobat Version 6 or 7 and would like to make detailed comments, please send a message to sna@un.org requesting a version of the draft chapter that permits you to comment. To optimize your commenting tools, please download Adobe Reader 7.0 for free from <http://www.adobe.com/products/acrobat/readstep2.html>