



Credit System Division  
Planning and Coordination Bureau  
Financial Services Agency  
3-1-1 Kasumigaseki, Chiyoda-ku, Tokyo 100-8967  
Fax: 03-3506-6236

July 5, 2002

**Re: Call for public comments regarding proposed reforms to banking and insurance regulations further liberalizing the sale of insurance products through banks and related institutions in Japan**

Dear Sirs,

The Insurance Committee of the European Business Community in Japan (EBC) fully supports ongoing efforts by the Japanese Government to modernize the regulatory environment surrounding the development and sale of insurance products in the Japanese market. Many tangible improvements have been made over the past few years, and we sincerely hope that this spirit of reform continues into the future.

The EBC Insurance Committee has long supported the complete liberalization of the sale of insurance products in Japan through banks and other affiliated institutions, and notes with approval that the reforms to banking and insurance regulations currently subject to public comment represent a very real and substantial step towards fulfilling this goal.

The EBC feels that this is ultimately in the best interest of Japanese consumers, who benefit from increased exposure to a wider variety of innovative insurance products specifically designed to meet the needs of the modern Japanese lifestyle.

As such, the EBC urges the Financial Services Agency to implement a final reform package that:

- Gives the Japanese consumer wide-ranging access through banks and affiliated institutions to a wide variety of differing insurance product types, and does not unduly restrict certain products;
- Places no extra administrative burden on insurance providers that choose to utilize banks and affiliated institutions as distribution channels, as these costs will eventually be passed on to the consumer in the form of restricted choice and higher prices;
- Makes it easy for banks and affiliated institutions to market and service the products they sell on behalf of insurance providers, with no “back-door” regulations or directives that restrict the ability of banks to effectively provide this new service for their customers.

Again, the EBC fully supports this and other initiatives designed to improve the provision of insurance services in Japan, and welcomes every opportunity to share European experience with the Japanese Government in this area.

Yours Sincerely,

Christian Wrede,  
Chairman,  
Insurance Committee,  
European Business Community.  
(Executive Director & CFO,  
AXA Life Insurance Co., Ltd.)