

Applied Systems response to PMI formal consultation on draft order

Applied Systems are a provider of software solutions to over 500 Brokers and Intermediaries in the UK.

In respect of the implementation of remedies outlined in the draft final order, our feedback is as follows.

Once the order has been finalised we expect the end-to-end process to include the following and have outlined the timescales required to achieve these.

1. **Technical Standards (Polaris) March 2015**
The industry standards documentation (e.g. business process document, EDI mappings implementation guides (MIGs) etc.) will be published once the CMA draft order has been made official.
2. **Analysis phase March 2015 – April 2015**
Insurers will revise the final order and generate formal change requests for all distribution channels, including software houses (SWH's).
Timescales come from recent discussions with insurers on our panel.
3. **Implement new EDI message version May 2015**
Implement new message versions as defined by Polaris MIGs (PROP05.6, MTAD05.6 and PLSA05.6).
Followed by implementation / testing / deployment of new mappings to production, by Applied.
4. **Build new Point of Sale policy document templates May/June 2015**
Schedule system development to support insurer template population as necessary.
CMA draft order requires creation of a document to support NCB scales.
5. **New document integration/mapping June – October 2015**
Work with motor insurer panel to integrate revised Polaris scheme outputs to new document.
6. **Insurer document testing/sign off July – November 2015**
Insurers to review / test / sign off documentation changes - insurer departments involved include testers, underwriting, compliance/legal. To run in parallel with point 5 above.
7. **Broker platform development September – December 2015**
Changes required to core broker software platforms
8. **Insurer acceptance testing/sign off (Insurers) January – March 2016**
This phase can only start once all system changes have been completed.
9. **Broker software releases deployed to production April/May 2016**

Note: Above steps do not include any margin for contingency which would for obvious reasons fall part of any formal project plan

Given the necessary work involved and the timescales outlined above, we believe that the date of 1st September 2015 stated draft order is both unrealistic and unachievable.

We also believe that we are one of the more agile software houses and taking into account the fact that all SWH's/insurers/affiliates would need to all make significant changes our recommendation would be to move the date back by at least 12 months.