

**From:** Kilcoyne, Thomas  
**To:** [Comments <comments@insurancecompact.org>](mailto:comments@insurancecompact.org)  
**Cc:** [Narcini, Anne Marie](#); [Schutter, Karen](#); [McElduff, Becky](#)  
**Subject:** Comments: RNUS 2019-2, Single Premium Group Fixed Annuity Contract Uniform Standards for Employer Groups  
**Date:** Wednesday, August 21, 2019 8:33:25 AM

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Please accept the following comment on the **Single Premium Group Fixed Annuity Contract Uniform Standards for Employer Groups (RNUS 2019-2)**. Note that I am commenting as an interested regulator and not presenting a position of the Pennsylvania Insurance Department.

The following edit is suggested for item **(3)** of **§ 4 H. Data Required**, to reinforce the intent of the provision and mirror state requirements.

**(3)** The provision may state that if the insurance company or the contractholder makes an error in the data, an equitable adjustment to the premiums and/or benefits will be adjusted made according to the correct data. An error will not end insurance validly in effect, nor will it continue insurance validly ended.

Thank you for considering the above comment. I plan to submit a similar comment for **RNUS 2019-3**.

Tom  
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