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**Sent:** Tuesday, July 9, 2019 8:23 PM  
**To:** Comments <[comments@insurancecompact.org](mailto:comments@insurancecompact.org)> <[comments@insurancecompact.org](mailto:comments@insurancecompact.org)>  
**Subject:** RNUS 2019-2: Comments

Dear Karen,

Thank you for the chance to comment on the above-described proposed rule change to the Single Premium Group Fixed Annuity Contract.

My comments are as follows:

1. In § 4 Contract Provisions, A. Amendments: The sentence seems to indicate that there are two ways in which a unilateral amendment to a benefit or coverage could occur, i.e., "...conform to changes in any applicable provisions *OR* requirements of the Internal Revenue Code." (Emphasis added). Are these two separate and exclusive ways that a unilateral amendment can occur and if so, please consider adding a comma in front of the word "or". In the alternative, you may want to better delineate the two ways that a contract can be amended. In addition, I would ask that the proposed rule require that the contractholder receive notice of the unilateral change within 30 days of the effective date of the change or when the plan administrator receives the notice of the change from the IRS.

Thank you for the chance to provide feedback.

Yvonne R. Hunter  
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