

From: Kilcoyne, Thomas
To: [Comments <comments@insurancecompact.org>](mailto:comments@insurancecompact.org)
Cc: [Narcini, Anne Marie](#); [Schutter, Karen](#); [McElduff, Becky](#)
Subject: Comments: RNUS 2019-3, Group Annuity Certificate Uniform Standards for Employer Groups
Date: Friday, August 23, 2019 3:05:59 PM

Please accept the following comments on the **Group Annuity Certificate Uniform Standards for Employer Groups (RNUS 2019-3)**. 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 **(2)** of **§ 4 J. Payment of Benefits**, to reinforce the intent of the provision and mirror state requirements.

- **(2)** If the contract allows adjustment of annuity payments as a result of a misstatement of age, sex or other relevant data; compliance with court orders or applicable law, or overpayments or underpayments, the certificate shall contain a provision describing an equitable adjustment to annuity payments ~~adjustments~~ for the reasons listed in the contract.

Similarly, the following edit is suggested for item **(2)** of **§ 4 K. Payment of Premium**.

- **(2)** If the contract allows adjustment of premium payments as a result of a misstatement of age, sex or other relevant data; compliance with court orders or applicable law, or overpayments or underpayments, the certificate shall contain a provision describing an equitable adjustment to premium payments ~~adjustments~~ for the reasons listed in the contract.

Thank you for considering the above comments. A similar comment was submitted for **RNUS 2019-2**.

Tom
Thomas P. Kilcoyne | Life Actuary
Pennsylvania Insurance Department
1311 Strawberry Square | Harrisburg, PA 17120
Phone: 717.783.8695 | Fax: 717.787.8555
www.insurance.pa.gov