From: Cubby, Shannon

Sent: Monday, November 20, 2017 2:50 PM

To: 'Smoucha, Lucy' < LSmoucha@insurancecompact.org>

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Subject: RE: IIPRC Public Notice: Public Product Standards Committee Teleconference - 11/28

Hi Lucy,

I wasn't sure who to forward our responses on the PSC agenda questions to, so thought I would just send them back to you:

- What <u>individual</u> life or annuity products or benefit features are companies filing with states rather than the Insurance Compact because of lack of Uniform Standards?
 - Applications with more than a 5 year lookback (many states allow a 10 year lookback. 10 years might be asking too much, but I think we could come up with a compromise like a 7 year lookback).
 - Product classifications changing from Illustratable to Non-Illustratable and vice versa.
- Where is product innovation heading, resulting in a need for new or amended regulatory requirements and uniform standards?
 - Efficiency
 - Customer Specific
 - Product issuing systems are becoming more agile and can accommodate more variability. ICC standards that allow for more variability in policy forms would allow us to utilize these systems more efficiently and create customized products that fit customer needs.
 - States that claim to be IIPRC members but continue to impose stateunique filing requirements make product issuing confusing... if someone sees ICC approved, then they think ICC standard not state specific.
- What new products or benefits are consumers asking for that cannot be filed with the Insurance Compact due to lack of uniform standards?
 - Group Annuities
 - Group Life (other than Term)
 - An open-ended IIPRC mailbox where we can request new standards as the need arises.

Thank you very much!

Shannon Cubby, Paralegal | Contract Development & Filing