

From: [Elaine A Zurovski](#)
To: [Comments <comments@insurancecompact.org>](mailto:comments@insurancecompact.org)
Cc: [Jeff Pederson](#)
Subject: Uniform Standards currently subject to the Five-year review (Phase 5)
Date: Thursday, August 20, 2015 5:24:40 PM
Attachments: [image001.png](#)
[image002.png](#)
[fin_2012-2.pdf](#)

Hello,

I am writing to provide comments on the five year review process for the following two standards:

1. IIPRC-A-02-I-GLB (Additional Standards for Guaranteed Living Benefits for Individual Deferred Non-Variable Annuities)
2. IIPRC-A-03-I-GLB (Additional Standards for Guaranteed Living Benefits for Individual Deferred Variable Annuities)

I have reviewed the public comments and suggested changes but I do not see anything about adding the information from Filing Notice 2012-2 (attached to this email). I am not sure if it is part of the five year process to update the Filing Notices to the new standards so I am sending this email to make sure it is covered.

I think it would be helpful to update this information into both of the standards referenced above. Even though the Filing Notice is only for non-variable annuities, if there is a fixed account within a variable annuity then this Filing Notice nonforfeiture requirement must be met. I am a filer and I experienced an objection earlier this year because I did not know the Filing Notice applied to variable annuities with a fixed account.

I just want to make sure other filers out there are prepared for their next filing and have all the information they need to do so.

Please email or call me if additional information is needed.

Thank you for your time.
Elaine Zurovski

Elaine Zurovski
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