



Wayne Mehlman
Senior Counsel

September 11, 2020

Interstate Insurance Product Regulation Commission (IIPRC)
Product Standards Committee
444 North Capitol Street, NW
Hall of the States, Suite 700
Washington, DC 20001-1509
comments@insurancecompact.org.

RE: *Additional Standards for Qualifying Events for Waiver of Monthly Deductions Benefits*
Additional Standards for Qualifying Events for Waiver of Premium Benefits
Additional Standards for Waiver of Surrender Charge Benefit for Life Insurance

To the Product Standards Committee:

The American Council of Life Insurers (“ACLI”)¹ appreciates this opportunity to comment on the above-referenced revised uniform product standards. We also appreciate that this Committee incorporated many of the recommendations that were included in our February 18th comment letter to the Management Committee.

We have some additional comments relating to the *Additional Standards for Qualifying Events for Waiver of Monthly Deductions Benefits* and *Additional Standards for Qualifying Events for Waiver of Premium Benefits*, and they read as follows (in italics):

Section 3.A.(3) within the Benefit section - For increased clarity and conformity, we suggest that this subsection be addressed in the subsection above. Everything else here applies to both “total disability” and “qualifying event”.

Section 3.A.(10) within the Benefit section – We recommend that an example for “total disability” be provided in this subsection.

Section 3.C.(1)(b) within the Exclusions section – This subsection contradicts what is in Section B.(1)(b) which states “other than for total disability, the insured shall not be required to be younger than a specified age...”.

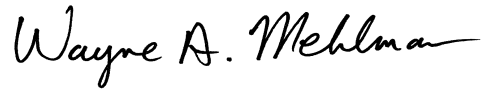
¹ The American Council of Life Insurers (ACLI) is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. 90 million American families rely on the life insurance industry for financial protection and retirement security. ACLI’s member companies are dedicated to protecting consumers’ financial wellbeing through life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, and dental, vision and other supplemental benefits. ACLI’s 280 member companies represent 94 percent of industry assets in the United States. Learn more at www.acli.com.

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Section 3.H.(1) within the Preexisting Conditions section - The exclusions contained in Section 3.C should be considered before finalizing this particular section.

Thanks again for this opportunity to comment. If you have any questions, feel free to contact me at waynemehlman@acli.com or 202-624-2135.

Sincerely,

A handwritten signature in black ink that reads "Wayne A. Mehlman". The signature is written in a cursive style with a long horizontal flourish at the end.

Wayne Mehlman
Senior Counsel, Insurance Regulation