

Section	Comment
General Comment	We found the changes to be prescriptive. Is there an event driving these changes? In a market place, where innovation is being encouraged, the changes may not support innovation.
Definitions – Benefit ineligibility period	Why is this option only available when there is no identifiable charge? By having this, even with a charge, the cost of the benefit can be reduced to the consumer. While the lengths should be disclosed, we are not sure we understand why this wouldn't be allowed as there may be designs which can leverage this flexibility to find solutions for the market.
Definitions – Qualifying event	Does this mean that both (1) and (2) are required or does this meant either are required?
Section 1.B.2 – Variability of Information	We are unclear as to why there are all these limits in this section. What abuse are we trying to prevent? It looks like we may be limiting potential innovation with all these limits.
Section 1.B.2.a – Variability of Information	Similar to the general statement on innovation, why is the life expectancy no less than 6 month included? What is the purposed of being prescriptive?
Section 1.B.2.i – Variability of Information	Why can't the waiting period be greater than 90 days? There may be significant discounts available with longer waiting period which may be appreciated by those that are price sensitive.
Section 1.B.3 – Variability of Information	While we understand that this has been a Compact rule, it is unclear why we can't have a zero in any range. Can this be reviewed? Having a zero allows for more flexibility in the policy form, enabling more variation and options while gaining synergies for one policy/rider form.
Section 3.A.2.b – Benefit	Are we allowed to define what constitutes the customary duties for homemakers?
Section 3.A.3 – IIPRC Comment	Does adding a grooming/personal hygiene ADL result cause or result in any tax qualification issues? Is this an improvement (as it allows for innovation) or does it cause more work/harm?
Section 3.B.1.b – Conditions for Waiver Benefit Eligibility	Does this mean that we cannot have a limit on what age we issue or offer the waiver to?
Section 3.B.3 – Drafting Note	What is the benefit of not allowing for pre-existing conditions? Why are we not allowing for the option of the qualifying event to occur after the benefit eligibility date?
Section 3.B.4 – Benefit	Why are items 4,5,6, etc. being added? Is there some challenge that is being solved? By adding these, the waiver provision is more restrictive. Is that the goal? That would not support potential innovation.
Section 3.C.1 – Preexisting Conditions	What is the purpose of adding this new requirement? This appears to limit who can get the Waiver vs. the past when we could have issued the rider but excluded their preexisting conditions. Does this encourage anti-selective behavior?
Sections 3.D.1.g – Exclusions	In the past we could go to age 60. Why are we changing this to 65? While this is forcing something (people working longer), it is an expensive additional cost. Should this be left to the market vs. being prescribed?
Sections 3.D.3 – Exclusions	How do (e) or (f) help or benefit?