

**DATE:** November 20, 2007

**TO:** IIPRC Management Committee

**FROM:** IIPRC Industry Advisory Committee

**SUBJECT:** Operating Procedure for the Filing and Approval of Product Filings and APPENDIX A

We are submitting comments in addition to those submitted on November 15, 2007.

We wish to bring the following “mix and match” issues to the attention of the IIPRC Product Standards Committee, the IIPRC Management Committee and the IIPRC Commission:

The ADDITIONAL SUBMISSION REQUIREMENTS section of the individual life application standards requires companies to certify if replacement questions and suitability questions and disclosures will be included in a separate form from the application. The standards allow the company to decide if the questions/disclosures will be included in the application or if they will be included in a separate form. The standards allow this flexibility since it was determined that replacement and suitability are “process” issues that are outside the scope of the IIPRC and accordingly the standards could not require that companies include these in application forms. Similar requirements will be included in the individual annuity, disability income and long-term care applications, as well as group enrollment forms for all the four business lines.

In some states today, the use of such questions/disclosures does not require prior approval with the states if companies use the prescribed language. In other states, prior approval is required.

In situations where a filing is required, companies will indicate that they want to use these questions/disclosures with IIPRC approved applications. In situations where filing is not required, companies will use these questions/disclosures with IIPRC approved applications without notifying the states of this.

***We believe that, regardless of whether prior state approval is required for the use of the questions/disclosures, companies must be allowed to continue to use such questions/disclosures with IIPRC approved applications indefinitely and there should not be any “mix and match” limitation applied to such use.***

We also believe that the same should hold true for other “out of IIPRC scope” processes, such as, but not limited to, life illustrations, temporary insurance agreements, and HIV Testing Consent Forms.

We are seeking confirmation that the “out of IIPRC scope” processes will not be subject to the “mix and match” limitations outlined in Section 110 of the *Operating Procedure for the Filing and Approval of Product Filings*.

Submitted by:

IIPRC Industry Advisory Committee:

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