

From: Ramge, Bruce
Sent: Friday, December 11, 2009 8:34 AM
To: Schutter, Karen
Cc: Frohman, Ann; Blanchard, Holly; Rink, John
Subject: Comments relating to GLWB riders

Karen,

Are you still accepting comments on the guaranteed life withdrawal benefit riders for annuities? If so, I would like to provide the following:

At the meeting held in conjunction with the NAIC National Meeting, we heard comments from insurers and consumers relating to the termination provisions. Upon my return I reviewed the Viatical Settlements Model Act, which was adopted by Nebraska. I do not feel that it addresses the sale of these types of policy features. As such, I am concerned that having no regulatory framework for the sale of such annuity features would leave all parties within such a transaction unprotected from potential problematic, abusive or fraudulent practices.

Thank you for considering this comment.

Bruce Ramge