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

RE: Proposed Amendments to the *Single Premium Group Fixed Annuity Contract Uniform Standards for Employer Groups*

Members of the Management Committee:

The American Council of Life Insurers (“ACLI”) would like to offer the following suggestions to provide for additional specificity in the proposed amendments to the *Single Premium Group Fixed Annuity Contract Uniform Standards for Employer Groups*.

The Purpose and Scope (on Page 1) should be revised, as follows:

2. Purpose and Scope: The purpose of this rule is to establish reasonable uniform standards for group immediate or deferred ~~single premium group~~ fixed annuity contracts that are issued to employers, or the trustees of a fund established by an employer pursuant to either a defined benefit or defined contribution plan, and are permitted in the jurisdiction where the contract is delivered or issued for delivery. These contracts ~~may be~~ used ~~but are not limited to~~ use with ~~as part of a Pension Risk Transfers~~. The standards apply to ~~annuity contracts that provide single premium,~~ fixed annuity and other guaranteed payments where funds are held in the general account or in a book value separate account where the amount of the benefits paid under the contract pursuant to the guarantees will not vary with the investment performance of the separate account. The insurance company guarantees all annuity payments purchased under the contract. The contract provisions ~~are intended to~~ reflect the provisions of the plan. The contracts may provide benefits to eligible plan participants who are annuitants and their beneficiaries or alternate payees. Separate additional standards apply to group annuity certificates.

The Scope (on Page 3) should be revised in accordance with the proposed edits above, as follows:

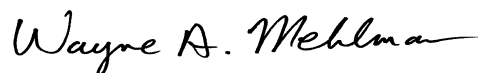
Scope: These standards are intended to apply to paper or electronic group immediate or deferred ~~single premium group~~ fixed annuity contracts that are issued to employers, or the trustees of a fund established by an employer pursuant to either a defined benefit or defined contribution plan, and are permitted in the jurisdiction where the contract is delivered or issued for delivery. These contracts may be used but not limited to as part of a use with Pension Risk Transfers. The standards apply to ~~single premium, annuity contracts that provide fixed annuity and other guaranteed payments~~ where funds are held in the *General Account* or in a book value *Separate Account* where the amount of the benefits paid under the contract pursuant to the guarantees will not vary with the investment performance of the *Separate Account*. The insurance company guarantees all annuity payments purchased under the contract. The contract provisions are intended to reflect the provisions of the *Plan*. The contracts may provide benefits to eligible *Plan* participants who are *Annuitants* and their *Beneficiaries* or *Alternate Payees*. Separate additional standards apply to group annuity certificates.

The Definition of “Pension Risk Transfer” (on Page 4) should be revised, as follows:

~~“Pension Risk Transfer” - when a defined benefit pension provider purchases. The purchase by a defined benefit pension plan provider of a group annuity contract from an insurance company in exchange for a premium payment in respect of transfers in order to settle some or all of the plan’s pension benefit liabilities its liability to pay pension benefits to plan participants. to an insurance company in exchange for a lump sum payment.~~

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

Sincerely,



Wayne Mehlman
Senior Counsel, Insurance Regulation