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Sent: Monday, June 24, 2019 5:11 PM
To: Narcini, Anne Marie <ANarcini@insurancecompact.org>
Cc: Clausen, Heidi <HCLAUSEN@UTAH.GOV>
Subject: Editorial comments on DI ROP standards

Anne Marie, I'd like to offer some editorial comments on the draft standards exposed by the Management Committee.

1. Section 1.B.(2) needs some editing. Maybe the following would do:

For purposes of the minimum loss ratio compliance demonstration, the base policy shall meet minimum loss ratio with and without the return of premium benefit, provided that minimum loss ratio compliance demonstration when the return of premium benefit is combined with the policy shall assume one-hundred percent (100%) of policies are issued with the rider.

2. Section 1.B.(3)(a)

Replace "The option" with plural "The options" or use "Any option" or "All options". The lead in paragraph is plural, and "The option" seem wrong.

3. Section 1.B.(4)

For consistency with other items in this section, replace "explain" with "an explanation of"

4. Section 2.B.(3)(c)

I would advocate for this to be replaced with:

(i) The schedule may show the benefit as a percentage of premium paid to date or percent of all premiums projected to maturity.

(ii) The schedule should clearly label whether the percentage shows applies to premiums paid to date or all premiums projected to maturity.

I don't think it is necessary to include the formula.

5. Section 2.B.(3)(d)

I think that a Drafting Note could be useful. Some readers could interpret this requiring benefit of 100% of premiums at maturity or maximum age. Maybe something along the lines:

Drafting Note: This does not require that 100% of premium be returned at maturity or maximum

age. It requires the full benefit be available no later than maturity or maximum age.

6. Section 3.A.(2)(a) and 3.A.(2)(b)

Delete "A description of" from both.

7. Section 3.A.(2)

Through the section there are multiple references to "interval" and "specified interval". I would suggest using "specified interval" everywhere "interval" is used.

8. Section 3.A.(4)

Same comment as in #2 above. Use of singular "the option" after "If there are any options".

9. Section 3.A.(5)

Same comment as in #7 above. Consider replacing "interval" with "specified interval".

10. Section 3.A.(7)

Consider adding an example through a Drafting Note. Something along the lines: This section addresses an issue when ...

11. Section 3.C.(1)

Consider revising it to clarify that additional rider premiums need to stop.

"The form shall provide the return of premium benefit terminates, and premiums for return of benefit rider stop, when the claims ..."

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, Actuary

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