

Brian Bayerle  
Senior Actuary

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Policy Analyst

March 3, 2022

Mike Boerner  
Chair, NAIC Life Actuarial Task Force (LATF)

Re: APF 2022-01

Dear Mr. Boerner:

The American Council of Life Insurers (ACLI) appreciates the opportunity to submit feedback on the exposed APF 2022-01.

ACLI is fully supportive of clarifying requirements for retrocessions of YRT business. We appreciate such commonsense clarifications within the Valuation Manual, and we welcome the adoption of this amendment by LATF during a future meeting.

Thank you for your consideration,



Colin Masterson

cc: Reggie Mazyck, NAIC