

Brian Bayerle
Senior Actuary

April 22, 2022

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

Re: APF 2022-04

Dear Mr. Boerner:

The American Council of Life Insurers (ACLI) appreciates the opportunity to submit comments on APF 2022-04. ACLI supports this necessary effort to accommodate the eventual cessation of LIBOR.

We have several suggestions around the APF and the publishing of rates:

- It would be beneficial to produce both LIBOR and SOFR based spreads for 2022. We anticipate majority of in-force derivatives will still be on LIBOR until transition in 2023. Ideally, both rates could be published until 7/1/2023 provided data is available.
- Due to some of the operational changes that may be presented for both NAIC preparing the tables and for companies to implement them, it may be preferable to implement approach 2.A outlined in the Academy deck allowing for actuarial judgment.
- ACLI supports using a single spread adjustment instead of date-specific adjustments. This approach is straightforward operationally and does not produce a materially different result.
- We agree with the recommendation to defer day count conventions for a future APF.

Thank you for your consideration of our comments.



cc: Reggie Mazyck, NAIC