

Brian Bayerle

Chief Life Actuary

202-624-2169

BrianBayerle@accli.com

Colin Masterson

Policy Analyst

202-624-2463

ColinMasterson@accli.com

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Rachel Hemphill

Chair, National Association of Insurance Commissioners (NAIC) Life Actuarial (A) Task Force (LATF)


Re: APF 2023-11 (RBC Consistency)

Dear Chair Hemphill:

The American Council of Life Insurers (ACLI) appreciates the opportunity to submit comments on APF 2023-11, which proposes removing references to RBC in VM-20 and VM-21 that are inconsistent with the purpose, scope, and intended use of RBC in alignment with improvements made in related Sections of the VM-22 draft.

ACLI has no objections to this APF and we support its adoption at a future session of LATF.

Sincerely,

 *Colin Masterson*

cc: Scott O'Neal, NAIC