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Rachel Hemphill

Chair, NAIC Life Actuarial (A) Task Force (LATF)

Re: APF 2023-13 (Annuity mortality tables and non-US lives mortality)

Dear Chair Hemphill:

The American Council of Life Insurers (ACLI) appreciates the opportunity to submit comments on APF 2023-13 which proposes changes to VM-M regarding annuity mortality tables and non-U.S. lives mortality. ACLI has several suggestions to improve the APF which are outlined below and reflected as highlighted text in the accompanying draft APF.

The existing Section 1 and Section 2 apply to industry tables. Given the new tables will be constructed from a single company's data, we would suggest moving the optionality to create tables to a new Section 3. We do, however, think it would be beneficial to reflect existing country-specific tables, so we have retained language in Section 1 and Section 2 to allow for these tables.

The language around using own company data should reflect the optional nature of this approach, so we suggest changing "will" to "may."

We also have the following requests and recommendations:

- Regulators should clarify if all the policies in the block valued using a given table are required to have the same country of residence. Are immaterial numbers of policies with residences in other countries allowed? ACLI suggests allowing for accommodation around these issues.
- Given these tables could be used to value group contracts, we suggest adding "certificates" to scope.
- We recommend consistent treatment of international mortality in VM-20 and VM-22. The current draft of the VM-22 Standard Projection Amount points to the 1994 GAM table for international business.

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Thank you once again for considering our comments and we look forward to a future discussion of this APF.

Sincerely,

B. Banfuli Colin Masterson

cc: Scott O'Neal, NAIC