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

Re: Exposed APFs from the February 2, 2023, LATF Meeting

Dear Ms. Hemphill:

The American Council of Life Insurers (ACLI) is appreciative of the opportunity to comment on several of the APFs that were exposed by LATF during their meeting on February 2, 2023. This includes APF 2022-09 (VM-31 Reporting Issues), APF 2022-10 (UL with Non-material Secondary Guarantee and IUL NPR), and APF 2023-02 (Supplement Reporting and Reconciliation).

ACLI is supportive of the changes proposed within these APFs and would welcome their adoption at a future LATF meeting.

We will need additional time for our comments on APF 2023-03 but will aim to have responses on items 3 and 4 in that APF by the NAIC Spring Meeting materials cutoff. Additional feedback on items 1 and 2 will be provided as soon as feasible.

We look forward to the discussion at a future LATF meeting. Thank you.



cc: Scott O'Neal, NAIC