

**Brian Bayerle**  
Senior Actuary

June 14, 2022

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

Mr. Fred Andersen  
Chief Life Actuary, Minnesota Department of Commerce

Re: June 2<sup>nd</sup> Exposure of Actuarial Guideline Asset Adequacy Testing

Dear Messrs. Boerner and Andersen:

The American Council of Life Insurers (ACLI) appreciates the opportunity to submit the following comments on the June 9<sup>th</sup> (Fifth) exposure of Actuarial Guideline (AG) on Asset Adequacy Testing (AAT, collectively Guideline).

ACLI is appreciative of the hard work of the regulators in this important and time-intensive effort. ACLI is confident that implementation of this Guideline will demonstrate the professionalism of Appointed Actuaries throughout the industry.

We look forward to work with LATF as regulators develop the template and template instructions accompanying the Guideline. Further, we look forward to engaging with LATF in the monitoring of the effectiveness of the Guideline and potential incorporation into VM-30 or sunseting of the various aspects of the Guideline.

Thank you.



cc: Reggie Mazyck, NAIC; Ben Slutsker, Minnesota Department of Commerce