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June 1, 2022

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

Re: May 2022 Re-Exposure of APF 2020-12

Dear Mr. Boerner:

The American Council of Life Insurers (ACLI) appreciates the opportunity to submit feedback on APF 2020-12 which was re-exposed by LATF during their meeting on May 26, 2022.

ACLI believes that additional work to APF 2020-12 is needed to address a number of key issues, including topics such as an immateriality exemption. It is our hope that we can continue to work alongside regulators to develop improvements for such a future APF.

Thank you for your consideration.



cc: Reggie Mazyck, NAIC