

**Brian Bayerle**  
Senior Actuary

August 25, 2020

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

Re: Individual Life Insurance Mortality Improvement Scale Recommendation

Dear Mr. Boerner:

The American Council of Life Insurers (ACLI) appreciates the opportunity to comment on the exposed Individual Life Insurance Mortality Improvement Scale Recommendation for Use with AG 38 and VM-20 on behalf of our member companies. We appreciate the hard work of the Life Mortality Improvement Subgroup (LMIG) in development of their recommendation for the mortality improvement (MI) scale.

ACLI is supportive of the LMIG recommendation to maintain the current methodology for the 2020 MI scale. The methodology was designed to take currently available data and develop the scale in a repeatable manner. While the LMIG contemplated revisions to the 2020 MI scale due to the pandemic, they ultimately decided there is not sufficient data available at this time to make any COVID-19-specific adjustments. As the actual mortality experience becomes known over the next 1 to 2 years, that data will begin to inform the MI estimates gradually. We believe, in the absence of additional information, the LMIG recommendation is the best path forward.

We look forward to a discussion of this topic.

Sincerely,



cc: Reggie Mazyck, NAIC