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September 29, 2022

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

Re: APF 2022-06

Dear Ms. Hemphill:

The American Council of Life Insurers (ACLI) appreciates the opportunity to submit feedback on the exposed APF 2022-06.

After reviewing the proposal, ACLI would like to confirm our support for this effort to restore the mention of inflation rate assumption to VM-31 and align the Life and VA reporting requirements. We believe this is a commonsense change that will help industry and regulators by mitigating the risk of inadequate and misrepresentative reporting for Life and Variable Annuity products.

Thank you for your consideration,



cc: Scott O'Neal, NAIC

