



Brian Bayerle

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November 11, 2025

Rachel Hemphill

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

Fred Andersen

Chair, NAIC Life and Annuity Illustration (A) Subgroup

Ben Slutsker

Chair, NAIC Life and Annuity Illustration (A) Subgroup

Re: September Exposure of Revisions to Actuarial Guideline (AG) 49-A

Dear Chairs Hemphill, Andersen, and Slutsker:

The American Council of Life Insurers (ACLI) appreciates the opportunity to provide feedback on the October re-exposure of revisions to AG 49-A, and appreciate the reflection of many of our comments in this draft.

While we continue to support the concept of there being no minimum to the Historical Period in Sections 7.B.iii.1 and 7.B.iii.2, we would prefer 5 years as the minimum to provide policyholders critical information to understand the differences between indices available to them.

As an editorial suggestion, we note that in two places the drafting note says, "*issued prior to April 1, 2026*"; this is inconsistent with other references in AG 49-A, and we suggest that this be updated as the following: "*sold prior to April 1, 2026*".

We appreciate the consideration of our recommendations, and we look forward to further discussion of the Guideline.

Sincerely,

A handwritten signature in dark ink, appearing to read "B. Bayerle", is written over a light blue horizontal line.

CC: Scott O'Neal, NAIC; Jennifer Frasier, NAIC

American Council of Life Insurers | 300 New Jersey Avenue, NW, 10th Floor | Washington, DC 20001

The American Council of Life Insurers is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. 90 million American families rely on the life insurance industry for financial protection and retirement security. ACLI's member companies are dedicated to protecting consumers' financial wellbeing through life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, and dental, vision and other supplemental benefits. ACLI's 275 member companies represent 93 percent of industry assets in the United States.