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

Re: April 2024 Re-Exposure of APF 2023-13

Dear Chair Hemphill:

The American Council of Life Insurers (ACLI) appreciates the opportunity to submit comments once again on APF 2023-13 regarding Annuity mortality tables and non-US lives mortality. We are also grateful to the NAIC for already incorporating some ACLI suggestions into the proposal such as adding certificates into scope and creating consistent treatment of international mortality in VM-20 and VM-22 by including reference to the 1994 GAM Table.

After reviewing this most recent exposure from the April 25, 2024 meeting of LATF, we did have one main substantive concern regarding some of the language used throughout the proposal which is the use of “shall” rather than “may” in the new Section 3.C.1.h highlighted in blue below.

**Section 3.C.1.h (new):**

**For a group of policies or certificates issued in foreign countries covering insureds who are not residents of the United States:**

- i. The company shall use a non-US valuation mortality table based on a non-US industry mortality table developed as described in Section 9.C.3.b.i. Companies using these tables shall seek approval from the Life Actuarial (A) Task Force by addressing to the chair of the Life Actuarial (A) Task Force. The non-US mortality tables that are to be used in the year-end YYYY valuation should be approved the Life Actuarial (A) Task Force before September of YYYY. If this timeline is not met, the company shall use the relevant non-US mortality tables used in the prior year; if there is no relevant prior year non-US mortality tables used, the company shall use the relevant US mortality tables.**

Given the VM-31 report now requires “[d]escription and rationale for mortality tables used to value non-US blocks of business”, it would seem that “may” would be appropriate as long as a company is justifying their use of a particular table regardless of if it is a US or non-US table.

Thank you once again for considering our feedback and we look forward to additional discussion on this topic at a future session of LATF.

Sincerely,

 Colin Masterson

cc: Scott O’Neal, NAIC