

For APF 2024-12, Section 3-B-2 (below), the exclusion is by product type and does not cover the full VM-22 exclusion list. I would suggest to add a bullet to exclude Fixed Annuities Contracts that are out of scope of VM-22 as outlined in the valuation manual. For example, to exclude the legacy fixed annuities that have stopped new sales. This would ensure that the data collected is truly in line with VM-22 without being skewed by legacy business.

The intent is to align the scope of business collected under this statistical plan with the scope of VM-22. Therefore, the following types of business defined in VM-01 are excluded from data collection:

- a. Guaranteed Investment Contracts
- b. Synthetic Guaranteed Investment Contracts
- c. Funding Agreements
- d. Stable Value contracts
- e. Pre-Need Annuities

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