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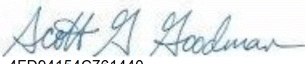
Mr. Mike Boerner
Chair, NAIC Life Actuarial Task Force (LATF)

Dear Mr. Boerner:

Genworth appreciates the opportunity to provide comments on Amendment Proposal Form 2020-09. We are in support of expanding the Life PBR Exemption in cases where the Company is only issuing revised contracts to existing policyholders exercising their contract options which were purchased prior to the enactment of Life PBR requirements. This proposal benefits our affiliated companies that no longer solicit new Life business, but still contractually provide Whole Life Conversion and Re-entry Term products from existing Term plans and riders. This exemption will allow Genworth and its regulators to focus on the inforce blocks in these companies, rather than putting time and expense into PBR compliance and review for the relatively minor number of contracts resulting from these contract options.

We appreciate the Task Force addressing this issue, which has been of interest to Genworth and others in the industry for the last few years.

Sincerely,

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Cc: Reggie Mazyck, NAIC
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