



August 23, 2022

Submitted electronically to rmazyck@naic.org

NAIC Index-Linked Variable Annuity Subgroup
Peter Weber, Chair & Tomasz Serbinowski, Vice-Chair

Re: *Actuarial Guideline ILVA: Nonforfeiture Requirements for Index Linked Variable Annuity Products* ("Fourth Exposure")

Dear Mr. Weber and Mr. Serbinowski:

On behalf of our members, the Insured Retirement Institute, Inc. ("IRI")¹ appreciates the opportunity to comment on the Fourth Exposure put forth by the Index-Linked Variable Annuity Subgroup ("Subgroup"). We appreciate the work of the Subgroup and believe that this Exposure has been significantly improved upon in moving towards a more principles-based approach; however, we are recommending some final changes to ensure that the Fourth Exposure is workable for our members.

IRI received and reviewed the comments on the Exposure by the American Council of Life Insurers ("ACLI") and the Committee of Annuity Insurers ("CAI"), dated August 23, 2022. With ACLI and CAI's permission, IRI shared this letter with our membership.

Following review by our members, IRI supports ACLI and CAI's comments with respect to its requests and recommendations regarding the Fourth Exposure, including the mark-up of the Fourth Exposure that is being put forth for consideration.

We would also like to specifically note our members' support for ACLI and CAI's recommendation regarding the effective date. It is crucial to avoid serious disruption to the current market, which would be detrimental to the industry and consumers alike, and as such, it is important to take into consideration how any guideline would affect contracts already in place. To prevent market disruption to the extent possible, our members support the effective date recommendation in ACLI and CAI's comment letter. We respectfully request that the Subgroup consider this recommendation, as well as all others put forth by ACLI and CAI in their letter.

On behalf of IRI and our members, thank you again for the opportunity to provide these comments. We would be happy to discuss further with you and look forward to continued collaboration and partnership with the Subgroup.

¹ IRI is the leading association for the entire supply chain of insured retirement strategies, including life insurers, asset managers, and distributors such as broker-dealers, banks, and marketing organizations. IRI members account for more than 95 percent of annuity assets in the U.S., the top 10 distributors of annuities ranked by assets under management and are represented by financial professionals serving millions of Americans. IRI champions retirement security for all through leadership in advocacy, awareness, research, and the advancement of digital solutions within a collaborative industry community.

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Sincerely,

Sarah E. Wood

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