

September 29, 2020

Fred Andersen
Deputy Commissioner of Insurance
Minnesota Department of Commerce
Chair, NAIC IUL Illustration (A) Subgroup

Re: Proposed Changes to Actuarial Guideline 49

Fred:


On behalf of the companies listed below (the "IUL Coalition"), thank you for the opportunity to submit our comments on the proposed change to Actuarial Guideline 49 ("AG 49").

Lincoln Financial Group
Pacific Life Insurance Company
National Life Group
John Hancock
Sammons Financial Group

We agree that this change is needed to align AG 49 with Actuarial Guideline 49-A that was recently adopted. We would propose, however, a slight change to the exposed wording that replaces the effective date of those changes (November 25, 2020) with the placeholder that appears in the exposure draft.

Thank you again for all of your hard work on this effort.

Respectfully Submitted,

A handwritten signature in black ink, appearing to be "Scott R. Harrison", with a long horizontal flourish extending to the right.

Scott R. Harrison
High Point Strategies, LLC
scott@highpointstrategies.llc

cc: Reggie Mazyck, NAIC