



September 9, 2025

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

Dear Chair Hemphill:

I write as a representative of the Cayman International Reinsurance Companies Association (CIRCA). Thank you for the opportunity to provide comments on the Actuarial Guideline 55 Reporting Templates Draft released at the Minneapolis meeting.

On the Attribution Analysis on slide 8, we recommend the addition of a Stat to GAAP component to the attribution. From a Cayman Islands viewpoint, many companies hold a US GAAP reserve. We at CIRCA are not aware of any company on island holding some form of economic reserve. This adjustment would otherwise fall into "Other". We believe a Stat to GAAP adjustment would provide useful information for LATF in the review of results.

As a point of clarification, on slide 7, the results by scenario continues to contemplate NY7. Is it correct to assume that "where applicable" refers to whether NY7 are among the scenarios routinely reported as part of results by the ceding company. Or, is it prescribing NY7 as part of this exercise?

CIRCA appreciates the opportunity to provide comments to LATF and thanks you for your consideration. We welcome any opportunity to discuss these and any other points further as the Task Force deems appropriate.

Sincerely,

Gregory L Mitchell

A handwritten signature in dark ink, appearing to read "Gregory L Mitchell", is written over a light blue circular stamp.

Chair of Board of Directors
Cayman International Reinsurance Companies Association