

Remaining Tier 2 Comments

- Allow SPIAs to be optional without exclusion test? (page 14)
 - ACLI comments
- Allow PRT to undergo certification method (rather than being ineligible) (page 33)
 - ACLI comments
- Exclusion Test Grouping (page 14)
 - Group with risks with significantly different profiles?
 - Same grouping as general PBR modeling or not?
 - ACLI comments
 - TDI comments
- Denominator for SERT (page 34)
 - Only benefits are also future premiums?
 - ACLI comments
 - TDI comments
- Deterministic Exclusion Test Criteria (page 38)
 - Does the company need to **A) only disclose** or **B) pass** the results of the 16 scenarios from the exclusion ratio test to be eligible for the deterministic reserve?
 - TDI comments
- Reinsurance Modeling (page 29)
 - Reflect contractual/other characteristics for considering reinsurance modeling?
 - TDI comments
- Include fair value certification? (page 45)
 - CA OPBR comments
 - TDI comments
- Permit PRT mortality with no or less than full credibility to follow a table from a third-party data provider instead of an industry table if available? (pages 58 & 60)
 - ACLI comments
- Allocation: method 1 or 2? (page 67)
 - ACLI comments
- Floor for contracts without cash surrender value (pages 21-22)
 - Working reserve concept, similar to a requirement in VM-21?
 - Include a floor for the deterministic-type reserve concept?
 - Academy comments

- TDI comments
- Reserving category for deferred annuities with depleted fund value
 - Payout or accumulation reserving category?