We believe the transition language in VM-22 section 2.B could benefit from additional clarification. We believe that the intention is for VM-22 to be effective on a prospective-only basis from the date the company elects VM-22 for a given block of business, however the current language could be misinterpreted. For example, if a company chooses to start applying VM-22 on a block of business starting at 6/30/2026, it was not clear whether VM-22 would apply only from 6/30/2026 onwards or from 1/1/2026 onwards. We also felt as though the last sentence in the section was redundant and potentially confusing, and to be consistent with the original language from VM-20 during the transition period we propose removing it.

We propose the following changes as a potential option to clarify the language in VM-22 section 2.B:

"**Transition**

A company may elect to establish minimum reserves pursuant to applicable requirements in VM-A, VM-C, and VM-V for business otherwise subject to VM-22 PBR requirements and issued during the first three years following the effective date of VM-22. This election may not be changed at future valuation dates without the approval of the domiciliary commissioner. If a company during the three-year transition period elects to apply VM-22 PBR to a block of such business, then a company must continue to apply the requirements of VM-22 for future issues of this business. Irrespective of the transition date, a company shall apply VM-22 PBR requirements to applicable blocks of business on a prospective basis starting at least three years after the effective date."

Thank you for the opportunity to provide comments on the exposure of the VM-22 framework. Hope everyone has a wonderful weekend.

Matthew Plett - F&G

and Angela McShane