

- Determine if the confidentiality of any group capital contribution or group capital ratio is maintained and if the confidentiality of the liquid stress test results and supporting disclosure are maintained which includes any Federal Reserve Board filings and information.

The ACLI recommends the Working Group change “determine” and other language around the criteria to read/incorporate “*review or discuss with domestic should there be issue with ORSA, LST or GCC related information.*”

We also recommend that direct reference to the GCC and LST be removed from the Marketing and Sales Standards on page 48 or, in the very least these could be made generic to apply to all prohibited marketing activity for any of the NAIC Model References listed on page 46.

Thank you again for the opportunity to submit comments.

Sincerely,



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