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November 18, 2022

Ms. Rachel Hemphill
Acting Chair, NAIC Life Actuarial Task Force (LATF)

Mr. Fred Andersen
Chair, Index Universal Life (IUL) Illustration (A) Subgroup

Re: Model Reg 582 Ideas

Dear Ms. Hemphill and Mr. Andersen:

The American Council of Life Insurers (ACLI) appreciates the opportunity to submit the following comments on the exposure soliciting feedback on the IUL Illustration (A) Subgroup's (Subgroup) consideration of changes to *Life Insurance Illustrations Model Regulation #582* (Model).

ACLI wishes to work with LATF and the Subgroup to develop solutions to appropriately address the regulatory concerns around IUL illustrations and to foster appropriate consumer understanding of these products. However, it is not a simple task to determine which subsections of the Model to consider opening without a clear understanding on what concern(s) the changes are trying to solve.

To help develop solutions, ACLI believes the Subgroup should more clearly outline the concern(s) they are trying to address and let that drive the development of potential revisions to the Model. As part of that process, ACLI suggests laying out a set of guiding regulatory principles to help drive more targeted feedback. Below, we suggest some possibilities:

Ensure illustrations:

- demonstrate both the benefits and risks of product features to promote consumer understanding;
- are product-neutral, so that any changes to the Model create a level playing field between products;
- are adaptable to new product development to ensure that consumers are provided innovative products that adapt to current market environments.

American Council of Life Insurers | 101 Constitution Ave, NW, Suite 700 | Washington, DC 20001-2133

The American Council of Life Insurers (ACLI) is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. 90 million American families rely on the life insurance industry for financial protection and retirement security. ACLI's member companies are dedicated to protecting consumers' financial wellbeing through life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, and dental, vision and other supplemental benefits. ACLI's 280 member companies represent 94 percent of industry assets in the United States.

ACLI hopes that with a greater understanding of regulator concerns, we would be better situated to provide feedback towards solutions to those concerns.

Thank you for your consideration and we look forward to future discussions.

Handwritten signature of B Banerjee in cursive script.

Colin Masterson

cc: Scott O'Neal, NAIC