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

Fred Andersen  
Minnesota Department of Commerce

Re: The October 2025 Exposure of Actuarial Guideline LV (AG 55) Draft Templates

Dear Chair Hemphill and Mr. Andersen:

The American Council of Life Insurers (ACLI) appreciates the opportunity to provide further feedback on the most recent exposure of the draft templates for AG 55 reporting. We would also like to take this time to thank LATF members and NAIC staff for the work which has already gone into this effort, including the consideration and subsequent amending of the proposal based on previous commentary ACLI provided in letters dated September 9<sup>th</sup> and October 15<sup>th</sup>.

ACLI supports adoption of the templates in their current form but requests clarification on considerations for the documentation of cash flow testing run assumptions:

- If only an assuming company's reinvestment assumptions are used, should only the 'Asset Yields – Assuming' tab be filled out, and not the 'Asset Yields – Ceding' tab?
- Further, if only a ceding company's liability assumptions are used, then in the 'Assumptions - Product 1' tab, should only sections pertaining to the ceding company be documented?

Thank you once again for the opportunity to provide this feedback and we look forward to additional discussion and responses to our inquiries soon.

Sincerely,

 *Colin Masterson*

CC: Scott O'Neal, NAIC