



September 27, 2019

Commissioner David Altmaier
Florida Office of Insurance Regulation
Chair, Group Capital Calculation (EE) Working Group
1100 Walnut, Suite 1500
Kansas City, MO 64106-2197

Via email to ddaveline@naic.org

Re: August 3, 2019 Discussion of Group Capital Calculation Confidentiality

Dear Commissioner Altmaier;

As several companies, including some of AHIP's members, engage in the Group Capital Calculation Field Testing, AHIP and its members appreciate the continuing cooperation displayed by you and other regulators and staff on the Working Group, and we welcome the opportunity to offer comments to the proposal concerning confidentiality which has been set out as a draft memo to Justin Schrader, Chair of the Group Solvency Issues (E) Working Group.

We have reviewed the letter of July 30, 2019, from the Coalition, and generally support the views expressed there. Although we also believe that the confidentiality language should be consistent not only from NAIC Model to NAIC Model, and also from state to state in their enactments of those Models, we are open to discussing some changes to the confidentiality language in the Holding Company Act, not only to increase the consistency between it and the confidentiality protections in the ORSA Model, but also to address any specific gaps that have come to light in recent years.

What we cannot support, however, would be any initiative which could weaken or otherwise restrict the strongest possible confidentiality protections for the GCC's calculations or any final figures resulting from them.

We look forward to continuing the cooperative atmosphere set by you and your fellow regulators as we continue working on this issue, and we hope you will let us know if there is further assistance we can offer.

Sincerely,

Bob Ridgeway
America's Health Insurance Plans