

February 21, 2020

Mr. Fred Andersen, Chairperson, IUL Illustration (A) Subgroup  
National Association of Insurance Commissioners

Re: Proposed Changes to Actuarial Guideline 49

Mr. Andersen,

Allianz has had the opportunity to preview a number of different proposals for changes to Actuarial Guideline 49 and we appreciate the opportunity to provide our comments on the matter.

In the spirit of gaining industry consensus, we support using the ACLI and IUL Coalition proposals as the foundation for the revised guideline. The companies represented by the ACLI and IUL Coalition offer a variety of product designs and serve a broad range of consumer needs, and these proposals accomplish the goals set forth by regulators while also being clear, direct, and broadly applicable.

Where there are differences between the proposals, we support the approach that is more broadly applicable to the various product designs offered throughout the industry.

Thank you for the opportunity to provide these comments.

Regards,



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