



October 24, 2025

Submitted electronically to jmatthews@naic.org

To: NAIC Annuity Suitability Working Group

Re: Letter in Support of Annuity Best Interest Regulatory Guidance and Considerations – October 7, 2025, Draft

On behalf of our collective members, the undersigned trades write to state our support for the updated draft of the Annuity Best Interest Regulatory Guidance and Considerations, dated October 7, 2025 (“Draft Guidance”). We greatly appreciate the efforts of the Working Group and the consideration of our comments and redline submitted on September 22, 2025. This updated version of the Draft Guidance appropriately reflects insurers’ supervisory obligations under the Suitability in Annuity Transactions Model Regulation (“Model”) and will be extremely helpful for regulators, companies, producers, and ultimately consumers, as the Model is now the standard across the country.

We commend the Working Group for tackling this important issue and considering our comments and feedback throughout this process. We are pleased to support this final version of the guidance. Should you have any questions or concerns, please reach out to Sarah Wood at the Insured Retirement Institute at swood@irionline.org.

Submitted on behalf of the following trades,

American Council of Life Insurers (ACLI)
Committee of Annuity Insurers (CAI)
Finseca
Financial Services Institute (FSI)
Indexed Annuity Leadership Council (IALC)
Insured Retirement Institute (IRI)
National Association for Fixed Annuities (NAFA)
National Association for Insurance and Financial Advisors (NAIFA)