On Aug. 25, 2020, the Receivership Law (E) Working Group requested comments from members, interested regulators and interested parties on qualified financial contract (QFC) guidance in the Receivers Handbook for Insurance Company Insolvencies, and the use of bridge financial institutions for handling QFCs in advance planning or a pre-receivership process. Refer to the attached Chapters 4 and 11. Please provide comments in the following areas:

Chapter 4 - QFCs

a. Comments on proposed edits to Chapter 4  
b. Additional recommended edits to Chapter 4.  
c. Recommendations for additional edits for:  
   o Guidance where insurers do not directly hold the QFC but rather are in contracts with a market facing third party that holds the QFC.  
   o Guidance for pre-receivership advance planning for QFCs.

Chapter 11 – Bridge Financial Institutions

d. Consider the use of bridge financial institutions outside of the Dodd Frank Receivership of a systemically important financial institution (SIFI) in addressing QFCs in receivership. Do you feel there would be a use for bridge financial institution outside of a Dodd Frank Receivership? If so, is the guidance in Chapter 11 applicable and useful for receivers in that context?  
e. Comments and any recommended edits on this topic within Chapter 11.