

From: [Langford, Tyler \(OIC\)](#)
To: [Matthews, Jolie](#)
Subject: FW: Annuity Suitability Working Group - Chair Draft Safe Harbor Guidance Document - Request for Comments by Friday, Nov. 8
Date: Monday, October 7, 2024 2:22:22 PM
Attachments: [image007.png](#)
[image008.png](#)
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[image011.png](#)
[image012.png](#)
[image013.png](#)
[Chair Draft re Safe Harbor 09-23-24.docx](#)

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Hi Jolie,

I'm passing along a couple of minor comments from staff at the Washington State Office of the Insurance Commissioner—see below.

It looks like there was an earlier comment period specifically for regulators that we may have missed, so my apologies if these comments are too late to be of use.

Please let me know if you have any follow up questions or need clarification.

Thank you,



Tyler Langford

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From: Kelcher, John (OIC) <John.Kelcher@oic.wa.gov>
Sent: Friday, October 4, 2024 2:19 PM
To: Langford, Tyler (OIC) <Tyler.Langford@oic.wa.gov>
Subject: RE: Annuity Suitability Working Group - Chair Draft Safe Harbor Guidance Document - Request for Comments by Friday, Nov. 8

Hi Tyler,

I had a couple of folks on my staff to review this.

One thought all looked good except for one little part the could maybe be reworded, definitely nothing I would suggest if it slowed anything down. It's the first paragraph, "The regulatory guidance is focused on offering guidance concerning insurance company obligations under the safe harbor provisions embodied in Section 6E..." The underlined part sounds a bit redundant. The suggestion offered, possibly, "The regulatory guidance focuses on insurance company obligations under the safe harbor provisions embodied in Section 6E....." that small stuff, so take it for what it's worth.

The other comments – "Agree with the Safe Harbor Guidance. I did not find any information in the document regarding annuity licensure". For example, in the Monitor the Relevant Conduct section, there don't appear to be

notes specific to verifying the financial professional has the necessary license and/or completed any required continuing education to maintain it. We didn't know if might get addressed elsewhere.

I hope that helps, thanks for reaching out.

Thanks,
John



John Kelcher

Pronouns: He, His
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From: Langford, Tyler (OIC) <Tyler.Langford@oic.wa.gov>
Sent: Wednesday, October 2, 2024 4:57 PM
To: Pasarow, Sofia (OIC) <Sofia.Pasarow@oic.wa.gov>; Kelcher, John (OIC) <John.Kelcher@oic.wa.gov>
Subject: FW: Annuity Suitability Working Group - Chair Draft Safe Harbor Guidance Document - Request for Comments by Friday, Nov. 8

Hi Sofia and John,

I'm following the NAIC's Annuity Suitability working group and received the attached draft safe harbor guidance document last week. Do either of you have any comments on the draft to pass along to the working group?



Tyler Langford

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From: Matthews, Jolie <JMatthews@naic.org>
Sent: Wednesday, September 25, 2024 6:21 AM
To: Matthews, Jolie <JMatthews@naic.org>
Subject: Annuity Suitability Working Group - Chair Draft Safe Harbor Guidance Document - Request for Comments by Friday, Nov. 8

External Email

To the Annuity Suitability (A) Working Group members, interested regulators, and interested parties:

Attached is a Working Group Chair draft safe harbor guidance document. The Working Group is exposing this document for public comment for a period ending **Friday, Nov. 8**.

If you have comments on the draft, please send those comments to me, Jolie Matthews, by email only to jmatthews@naic.org, **on or before Friday, Nov. 8**. If you have comments, the Working Group would appreciate specific comments, such as suggested language revisions to the draft document. The draft will be posted on the Working Group's webpage under the Exposure Drafts tab at this link: <https://content.naic.org/committees/a/annuity-suitability-wg>.

Also, as a FYI, the Working Group is currently scheduled to meet during the NAIC Fall National Meeting on **Sunday, Nov. 17** from **4:00 – 5:00 MT**. During this meeting, the Working Group will discuss the Working Group Chair draft safe harbor document, and any comments received by the Friday, Nov. 8 public comment deadline.

Thanks,

Jolie

Jolie Matthews
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Government Affairs / Government Affairs



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