



September 18, 2026

National Association of Insurance Commissioners
Life Insurance and Annuities Buyer's Guide (A) Working Group
Attn: Jennifer Cook, Senior Counsel
1101 K Street, N.W., Suite 650
Washington, DC 20005

Via email to: jcook@naic.org

Re: FACC Comment on August 3, 2026, Draft Exposure of NAIC Buyer's Guide

Dear Members of the Annuity Buyer's Guide Working Group:

The Federation of Americans for Consumer Choice (FACC) commends the Working Group for the efforts to improve the existing NAIC Buyer's Guide to ensure the Guide educates consumers about the value and benefits of fixed annuities while also making them aware of the considerations and questions they should contemplate when purchasing an annuity product. FACC in particular urges the Working Group to ensure the Buyer's Guide aligns with the 2020 Suitability in Annuity Transaction Model #275.

FACC represents Independent Marketing Organizations and insurance agencies who work directly with producers selling fixed indexed annuities as well as other forms of fixed annuities and life insurance. FACC works to promote a level playing field for independent insurance professionals by advocating for regulations and legislation that foster consumer choice while at the same time promoting consumer awareness in the financial services marketplace.

FACC has had an opportunity to review the redline edits being submitted on behalf of the Industry Coalition group (including ACLI and IRI) and believes those edits are very important to help add clarity for the consumer and ensure full alignment of the buyer's guide with applicable NAIC model laws and regulations, perhaps most importantly with the NAIC Model Suitability (Best Interest) Regulation. We urge the NAIC Working Group to adopt those Industry Coalition edits in full.

Thank you for taking these additional comments into consideration.

Sincerely,

Kim O'Brien, CEO

The Federation of Americans for Consumer Choice, Inc. (FACC) is a 501(c)6 non-profit organization incorporated in the state of Texas whose members are independent marketing organizations, agencies, and agents engaged in the distribution of fixed insurance and annuity products. FACC promotes public policy recognizing the value of guaranteed insurance solutions and preserving freedom of choice for consumers who seek products and services from independent agents representing multiple carriers and product options.