Draft date: 7/28/26

2026 Summer National Meeting
Columbus, Ohio

INVESTMENT DESIGNATION ANALYSIS (E) WORKING GROUP
Thursday, August 13, 2026
9:00 a.m. – 10:00 a.m.
Hilton Tower 401—Bellos Ballroom A – D—Lower Level

ROLL CALL

Ken Cotrone, Chair	Connecticut	Danielle Smith	Missouri
Amy Garcia, Vice Chair	Texas	Cynthia Iu	Nebraska
Laura Clements	California	Doug Stolte	Virginia
Carrie Mears	Iowa	Katy Bardsley	Washington
Gilbert Mendoza	Maryland	Amy Malm	Wisconsin

NAIC Committee Support: Charles Therriault/Hankook Lee/Marc Perlman

AGENDA

1. Consider Adoption of its Spring National Meeting Minutes (Doc. ID: 2026-005.01) —*Ken Cotrone (CT)* — Attachment A

2. Consider Adoption of its 2027 Proposed Charges (Doc. ID: 2026-006.01) —*Ken Cotrone (CT)* — Attachment B

3. Consider Adoption of a Proposed *Purposes and Procedures Manual of the NAIC Investment Analysis Office* (P&P Manual) Amendment to Update the List of NAIC Credit Rating Providers (CRPs) (Doc. ID: 2026-002.01, 2026-002.02) —*Ken Cotrone (CT) and Charles Therriault (NAIC)* — Attachment C, Attachment D

4. Consider Adoption of a Proposed Amendment to the P&P Manual for Analysis of Parent-Subsidiary Situations (Doc. ID: 2026-003.01, 2026-003.02, 2026-003.03) —*Ken Cotrone (CT) and Marc Perlman (NAIC)* — Attachment E, Attachment E - 1, Attachment E - 2

5. Consider Exposure of a Proposed Amendment to the P&P Manual to Update the Filing Exempt (FE) Treatment of Collateralized Loan Obligations (CLOs) — Attachment F
   (Doc. ID: 2026-007.01)
   —*Ken Cotrone (CT), Charles Therriault (NAIC), and Hankook Lee (NAIC)*

6. Consider Referral to the Credit Rating Provider Working Group on a Rating Agency request to become an NAIC Credit Rating Provider (CRP) — Attachment G, Attachment G -1
   (Doc. ID: 2026-009.01, 2026-009.02)
   —*Ken Cotrone (CT) and Charles Therriault (NAIC)*

7. Discuss a Request to be Added to the NAIC's List of Nationally Recognized Statistical Rating Organizations (NRSROs) to Be Used to Administer the NAIC's List of Qualified U.S. Financial Institutions — Attachment H, Attachment H - 1
   —*Ken Cotrone (CT) and Charles Therriault (NAIC)*
   (Doc. ID: 2026-010.01, 2026-010.02)

8. Discuss Any Other Matters Brought Before the Working Group
   —*Ken Cotrone (CT)*

9. Adjournment

Draft: 4/1/26

Investment Designation Analysis (E) Working Group
San Diego, California
March 24, 2026

The Investment Designation Analysis (E) Working Group of the Invested Assets (E) Task Force met in San Diego, CA, March 24, 2026. The following Working Group members participated: Ken Cotrone, Chair (CT); Amy Garcia, Vice Chair (TX); Laura Clements (CA); Carrie Mears (IA); Gilbert Mendoza (MD); Danielle Smith (MO); Tadd Wegner (NE); Doug Stolte (VA); Katy Bardsley (WA); and Amy Malm (WI). Also attending: Dave Wolf (NJ).

1. Adopted the Valuation of Securities (E) Task Force's 2025 Fall National Meeting Minutes

Malm made a motion, seconded by Wolf, to adopt the Task Force's Dec. 10, 2025, minutes (*see NAIC Proceedings – Fall 2025, Valuation of Securities (E) Task Force*). The motion passed unanimously.

2. Exposed a Proposed Amendment to the *P&P Manual* to Update the List of CRPs

Cotrone said the next item on the agenda is to discuss and expose an amendment to the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* (P&P Manual) that updates the list of credit rating providers (CRPs). The CRP HR Ratings de Mexico, SA de CV, made a request to the U.S. Securities and Exchange Commission (SEC) to update its full name to HR Ratings LLC, with its credit rating business to be referred to as HR Ratings. That request was granted, and the SEC now refers to this CRP as HR Ratings LLC on the Office of Credit Ratings (OCR) web page listing the current nationally recognized statistical rating organizations (NRSROs).

This non-substantive amendment (Attachment One-A) updates the name on the list of NAIC CRPs in Part Three of the *P&P Manual* to HR Ratings LLC.

Clements made a motion, seconded by Wolf, to expose the *P&P Manual* amendment to update the list of NAIC CRPs for a 30-day public comment period ending on April 24, 2026. The motion passed unanimously.

3. Approved a Referral to the Blanks (E) Working Group, Capital Adequacy (E) Task Force, and Statutory Accounting Principles (E) Working Group Regarding a Proposed Annual Statement Schedule Update for Security Identifiers

Cotrone said the next item on the agenda is to discuss a request to make referrals to the Blanks (E) Working Group, Capital Adequacy (E) Task Force, and Statutory Accounting Principle (E) Working Group to make updates to the annual statement schedules to create a consolidated security identifier field and a related security identifier type field.

Charles Therriault (NAIC) said this proposal would consolidate the currently used investment security identifiers—the Committee on Uniform Securities Identification Procedures (CUSIP), CUSIP International Numbering System (CINS), the Private Placement Number (PPN), and the International Securities Identification Number (ISIN)—into a single field on the statutory investment schedules. It would also add one additional investment security identifier, the S&P Global's LoanX ID (LXID) (formerly IHS Markit LoanX ID). LoanX IDs, or LXIDs, are unique identifiers used to track individual loans, borrowers, and lenders across the syndicated loan and private credit markets. The identifier was requested by the industry. All these identifiers, including LXIDs, are in S&P Global's Instruments Cross Reference Service (GICRS) database that the NAIC is integrating into its systems. Consolidating investment security identifiers into a single field will also make it easier to add additional identifiers in the future.

The recommendation also includes adding a security ID type field with a single-letter abbreviation to denote the type of security identifier being reported: C=CUSIP and CINS (including syndicated loans with a CUSIP), I=ISIN (including syndicated loans with an ISIN), P=PPN, and L=LXID. The proposal includes an NAIC-preferred order of security identifiers usage: CUSIP, CINS, ISIN, PPN, and LXID.

Two special-situation security IDs are recommended to accommodate commonly reported issues. The first would be for securities acquired within the initial reporting year of the financial statement reporting date that have not yet been issued an NAIC-recognized security ID, but where one was requested. A temporary security ID of ”000000000” would be used for that initial reporting year-end until the security ID is assigned. The temporary Security ID could only be used one time, in the initial reporting year-end, but would need to be changed to an identifier of ”999999999” in any subsequent reporting year-end, if a security ID was not assigned. The second special-situation securities that the insurer does not expect to receive a security ID and an identifier of ”999999999” would be used to clearly identify these securities as not having an NAIC-recognized security ID. The security ID of ”000000000” and ”999999999” would not have a security ID type. Securities with the security IDs of ”000000000” and ”999999999” would still need to follow *P&P Manual* guidance to determine the NAIC Designation.

The Securities Valuation Office (SVO) has been working with the American Council of Life Insurers (ACLI), the Private Placement Investors Association (PPiA), and the National Association of Securities Valuation Analysts (NASVA), along with the NAIC committee support, to assist the Blanks (E) Working Group in preparing referrals and a blanks update. The SVO requests the Working Group’s approval to submit referrals to the Capital Adequacy (E) Task Force and the Statutory Accounting Principles (E) Working Group, notifying them of this proposed change and asking for their feedback, and a separate referral to the Blanks (E) Working Group requesting these security identifier updates just discussed.

Mike Reis (Northwestern Mutual), representing the ACLI, PPiA, and NASVA, expressed his gratitude toward the SVO. He said Therriault mentioned several meetings, including a broader constituency, NAIC committee support, and vendors, to make sure all vested interests were covered. The association supports this project, as it benefits everyone. Securities entered into VISION might require a single security identifier, but it is important that SVO systems appropriately recognize other security identifiers so securities do not need to be refiled. There are resource constraints that potentially impact the SVO. Our group supports providing the SVO with the resources needed to get this done because this project is in everyone's best interest.

Cotrone directed the SVO to make referrals to the Capital Adequacy (E) Task Force, the Statutory Accounting Principles (E) Working Group, and the Blanks (E) Working Group, requesting updates to the security identifiers.

4. Exposed a Proposed Amendment to the *P&P Manual* Regarding Analysis of Parent-Subsidiary Situations

Marc Perlman (NAIC) said the “Parent-Subsidiary Situations” section of the P&P Manual (Part Three, paragraph 38) provides specific guidelines for assessing a subsidiary issuer based on its parent holding company's audited financial statements. The SVO has become aware that these guidelines are often read in isolation as the only way to rely on an issuer’s parent’s financial statements when more analytic latitude is permitted.

The SVO proposes an update to Paragraph 38 to clarify that while the manual currently delineates certain prescribed guidelines for use of the financial statements of an issuing subsidiary’s parent (like a safe harbor), the SVO can also rely on other information that it deems satisfactory to support such use.

Garcia made a motion, seconded by Piatt, to expose the revised *P&P Manual* amendment for the analysis of parent-subsidiary situations for a 30-day public comment period ending April 24, 2026 (Attachment One-B). The motion passed unanimously.

5. Received an Annual Report from the SVO on 2024 Carry-Over Filings

Therriault said the *P&P Manual* requires the SVO director to prepare a report on carry-over filings each year, to be presented to the Investment Designation Analysis (E) Working Group (formerly the Valuation of Securities (E) Task Force) at each Spring National Meeting. Carry-over filings are insurer-owned securities that were properly filed with the SVO but were not completed by the SVO prior to year-end. The report identifies an acceptable annual rate for carry-over filings with separate special reporting instructions in the *P&P Manual*. The report will identify whether the acceptable annual carry-over rate was significantly exceeded and, if so, whether the cause is traceable to resource constraints in the office. If there is a resource constraint, the chairs and members of Investment Designation Analysis (E) Working Group will consult with NAIC senior staff and the NAIC Internal Administration (EX1) Subcommittee to determine whether and how to evaluate the need for additional SVO staff or other resources.

For 2025, the SVO reviewed 23,319 filings comprised of 5,665 initial filings, 17,383 annual updates, two appeals, 250 material changes, and 19 renumbering requests (e.g., CUSIP changes). In comparison, in 2024, the SVO received 19,443 filings comprised of 4,480 initial filings, 14,685 annual updates, three appeals, 253 material changes, and 22 renumbering requests (e.g., CUSIP changes). Overall, this was a 19.9% increase in filing volume year-over-year, primarily due to private letter rating filings increasing by 49.1%. Total private letter ratings filings have risen from 1,961 filings in 2022 to 12,269 filings in 2025, a 525.7% increase over the three-year period.

There were 2,177 carry-over filings for year-end 2025 versus 1,496 in 2024, 1,262 in 2023, 1,199 in 2022, and 828 in 2021. There has been a substantial increase in the number of carry-over filings over the past five years. The 2025 overall carry-over rate of 9.3% is higher than the carry-over rates of 7.5% in 2024. As of March 11, there were 880 carry-over filings remaining.

As reported in prior years, a carry-over rate of 10% or higher typically indicates an analytical resource constraint in the office. However, the increasingly high number of private letter rating filings has distorted the overall carry-over percentage. A better measure of the office's overall analytical workload would be to exclude the private letter rating filings from the carry-over calculation, and the carry-over percentage excluding the private letter rating filings shows how much of the office's resources are being directed away from traditional filings.

Excluding private letter rating filings, the carry-over percentage for traditional SVO filings has consistently increased from 10.8% in 2023, 13.3% in 2024, and now 19.7% in 2025. The high 2025 carry-over rate for traditional filings indicates an analytical staffing resource constraint at the SVO and a need for additional resources. The SVO has been deferring an increasing amount of its work on traditional SVO filings further into the next calendar year to ensure that insurers owning securities with a private letter rating have an NAIC designation to report at year-end. If the SVO did not process these private letter rating filings, insurers could incur a punitive NAIC designation. As private letter rating volume continues to grow, the volume of carry-over filings has also increased. There is also an increasing likelihood that, soon, not all private letter rating filings will be completed by year's end.

Typically included with this report are updates on various projects the SVO is working on. Improvements continue to be made to the private letter rating filing process. The team continues to work on permitting multiple security identifiers with the implementation of the Business Entity Cross Reference Service (BECRS) and Global Instruments Cross Reference Service (GICRS) data set, and there have been updates to the billing process for Investment Analysis Office (IAO) systems.

Cotrone said that, given the increase in private letter rating filings received, the task of the Working Group going forward is to evaluate whether there are appropriate resources for SVO. If this trend continues, there will be greater strain on SVO staff to provide the necessary services. Therriault said, according to the report, there have been consistent year-over-year increases, and this is straining the office's resources.

Having no further business, the Investment Designation Analysis (E) Working Group adjourned.

https://naiconline.sharepoint.com/sites/naicsupportstaffhub/member meetings/e cmte/iatf/2026/march (spring nm)/summary and minutes/att one-idawg_2026-03-24_spring_2026_nm_minutes v5 (final).docx

NAIC
2026 SUMMER NATIONAL MEETING
COLUMBUS, OH

2027~~6~~ Proposed Charges

Investment Designation Analysis (E) Working Group

1. The **Investment Designation Analysis (E) Working Group (IDAWG)** will:

a. Review and monitor the operations of the NAIC Securities Valuation Office (SVO) and the NAIC Structured Securities Group (SSG) to ensure they continue to reflect regulatory objectives.

b. Maintain and revise the Purposes and Procedures Manual of the NAIC Investment Analysis Office (P&P Manual) to provide solutions for investment-related regulatory issues for existing or anticipated investments.

c. Monitor changes in accounting and reporting requirements resulting from the continuing maintenance of the Accounting Practices and Procedures Manual (AP&P Manual), as well as financial statement blanks and instructions, to ensure that the P&P Manual reflects regulatory needs and objectives.

d. Provide effective direction to the NAIC's mortgage-backed securities modeling firms and consultants.

e. Identify potential improvements to the credit filing and designation processes, including formats and electronic system enhancements.

f. Coordinate with the Invested Assets (E) Task Force, Investment Analysis (E) Working Group, and other NAIC working groups and task forces to formulate recommendations and make referrals to other NAIC regulator groups to ascertain that the purpose and objective of guidance in the P&P Manual is reflective in the guidance of other groups and that the expertise of other NAIC regulatory groups and the objectives of their guidance is reflected in the P&P Manual. Implement additional and alternative ways to measure and report investment risk.

NAIC Support Staff: Charles Therriault, Marc Perlman

To: Kenneth Cottrone, Chair, Investment Designation Analysis (E) Working Group
Members of the Investment Designation Analysis (E) Working Group

From: Charles A. Therriault, Director, NAIC Securities Valuation Office
Marc Perlman, Managing Investment Counsel, NAIC Securities Valuation Office

Re: Proposed P&P Manual Amendment to Update the List of NAIC Credit Rating Providers

Date: February 26, 2026

Summary: The credit rating provider (CRP) HR Ratings de Mexico, SA de CV made a request to the U.S. Securities and Exchange Commission (SEC) that their full name be updated to HR Ratings LLC with the name of their credit rating business being referred to as HR Ratings. That request was granted and the SEC now refers to this CRP as HR Ratings LLC on the Office of Credit Ratings (OCR) webpage listing the Current NRSROs.

Recommendation: The SVO staff recommends adoption of the attached non-substantive technical amendment to update the name of HR Ratings de Mexico, SA de CV to HR Ratings LLC on the List of NAIC Credit Rating Providers in Part Three, paragraph 24.

Part Three
SVO Procedures and Methodology for Production of NAIC Designations

LIST OF NAIC CREDIT RATING PROVIDERS

24. The CRPs that provide Credit Rating Services to the NAIC are:

…

- **HR Ratings LLC ~~de Mexico, S.A. de C.V.~~** – For credit ratings issued to financial institutions, brokers, or dealers; corporate issuers and issuers of government securities, municipal securities, or securities issued by a foreign government.

NOTE: The information shown above for each NRSRO was obtained from the SEC's website: *www.sec.gov/ocr* on February 26, 2026 ~~June 28, 2024~~, and confirmed against each NRSRO's annual Form NRSRO certification.

…

https://naiconline.sharepoint.com/teams/SVOVOSTaskForce/Shared Documents/Meetings/2026 IDAWG/2026-03 Spring National Meeting/02 CRP Name Update/2026-002.01 CRP Name Update.docx

April 24, 2026

Mr. Ken Cotrone, Chair
Investment Designation Analysis (E) Working Group
National Association of Insurance Commissioners
1100 Walnut Street, Suite 1000
Kansas City, MO 64106-2197

Re: American Council of Life Insurers Comments on Items Exposed for Comment by Investment Designation Analysis (E) Working Group with comments due April 24, 2026

Dear Chair Cotrone,

ACLI appreciates the opportunity to comment on the above referenced items, which were exposed for comment by the Investment Designation Analysis (E) Working Group (Working Group) during the NAIC 2026 Spring National Meeting.

Ref #2026-002.01: Credit Rating Provider Name Update – HR Ratings LLC

ACLI supports the proposed amendment to update the credit rating provider's name in the Purposes and Procedures Manual. We view this change as a clarification that enhances accuracy and consistency in NAIC guidance, without introducing substantive changes to regulatory intent, analytical standards, or insurer reporting obligations.

Ref #2026-0003.01: Clarify Assessment of Parent-Subsidiary Situations

The Working Group proposed amendments to the Purposes and Procedures Manual of the NAIC Investment Analysis Office (P&P Manual) intended to clarify the assessment of parent-subsidiary situations. ACLI supports the objective of the exposure, clarifying that the Securities Valuation Office (SVO) may rely on audited financial statements of a parent holding company for an issuing subsidiary without separate audited financial statements where the SVO has sufficient support, including through other information deemed satisfactory by the SVO.

ACLI's comments are focused on improving clarity in the conditional structure of the proposed text, specifically the placement and interaction of the "when," "or", and "if" clauses. As drafted, the sentence structure may imply unintended dependencies between conditions or create uncertainty as to whether each prong is a standalone basis for reliance. To better reflect the intended analytical latitude described in the exposure summary and to reduce the risk of inconsistent interpretation, ACLI recommends that the conditions be presented as a clear list of independent alternatives.

American Council of Life Insurers | 300 New Jersey Avenue, NW, 10th Floor | Washington, DC 20001

Accordingly, ACLI respectfully recommends revising the exposed language to the following:

38. In the case of transactions involving a parent holding company with an Audited Financial Statement and an issuing subsidiary without a separate Audited Financial Statement, the SVO may use the financial statements of the parent holding company as if they were prepared for the issuing subsidiary when any of the following exists:

    (i) The consolidating work papers relating to the issuing subsidiary are provided;
    (ii) The operations of the parent:
        a. are limited solely to owning the issuing subsidiary; and
        b. the issuing subsidiary constitutes at least 97% of the parent's pre-tax income and assets on a consolidated basis; or
    (iii) The SVO has determined there is other satisfactory support for such use.

ACLI believes this presentation makes clear that each condition is sufficient on a standalone basis, while preserving the SVO's discretion to rely on other satisfactory information. This change is intended to be purely clarifying and does not alter the underlying substance or policy direction of the exposure.

ACLI appreciates the opportunity to provide these comments and would welcome continued dialogue regarding this proposal. Thank you for your time and consideration.

Sincerely,

Adam Knepp, CPA
Senior Director, Accounting Policy
adamknepp@acli.com
202-624-2025

cc: Amy Garcia, Vice Chair - IDAWG
Charles A. Therriault, NAIC
Marc Perlman, NAIC
Hankook Lee, NAIC

SVO

NAIC
NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

TO:	Ken Cotrone, Chair, Investment Designation Analysis (E) Working Group Members of the Investment Designation Analysis (E) Working Group
FROM:	Charles A. Therriault, Director, NAIC Securities Valuation Office Marc Perlman, Assistant Director-Investment Counsel, NAIC Securities Valuation Office Hankook Lee, Assistant Director, NAIC Structured Securities Group
RE:	Proposed Amendment to the Purposes and Procedures Manual of the NAIC Investment Analysis Office (the "Purposes and Procedures Manual") to Clarify Assessment of Parent-Subsidiary Situations
DATE:	July 6, 2026

Summary: The "Parent-Subsidiary Situations" section of the Purposes and Procedures Manual (Part Three, Paragraph 38) provides specific guidelines for assessing a subsidiary issuer based on the audited financial statements of its parent holding company. The SVO has become aware that these guidelines are often read in isolation as the only way to rely on an issuer's parent's financial statements when more analytic latitude is permitted.

At the 2026 Spring National Meeting, the SVO proposed updates to Paragraph 38 to clarify that while the Purposes and Procedures Manual currently delineates certain prescribed guidelines for use of the financial statements of an issuing subsidiary's parent, the SVO can also rely on other information which it deems satisfactory to support such use.

The ACLI submitted the only comment letter. In its letter, the ACLI proposed a minor structural change to the initially proposed amendment, to clarify that each condition for reliance on a parent's financial statements is sufficient on a standalone basis, while still preserving the SVO's discretion to rely on satisfactory information. The SVO is comfortable with the ACLI's suggested edits and recommends their adoption.

Proposed Amendment –The proposed changes to the current P&P Manual are shown below with additions in red underline font color and deletions in ~~red strikethrough~~. Updates are highlighted in yellow.

PART THREE
SVO PROCEDURES AND METHODOLOGY FOR PRODUCTION OF NAIC DESIGNATIONS

FINANCIAL ANALYSIS

…

Parent-Subsidiary Situations

38. In the case of transactions involving a parent holding company with an Audited Financial Statement and an issuing subsidiary without a separate Audited Financial Statement, the SVO may use the financial statements of the parent holding company as if they were prepared for the issuing subsidiary when any of the following exists:

(i) T~~t~~he consolidating work papers relating to the issuing subsidiary are provided;

(ii) ~~or when~~ T~~t~~he operations of the parent:

(a) are limited solely to owning the issuing subsidiary; and

(b) the issuing subsidiary constitutes at least 97% of the parent's pre-tax income and assets on a consolidated basis; or

(iii) The SVO has determined there is other satisfactory support for such use.

https://naiconline.sharepoint.com/teams/SVOVOSTaskForce/Shared Documents/Meetings/2026 IDAWG/2026-03 Spring National Meeting/04 Parent_Subsidiary Situations/2026-0003.01 PP_Manual_ParentSubsidiary_v3.docx

SVO

NAIC
NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

TO:	Ken Cotrone, Chair, Investment Designation Analysis (E) Working Group Members of the Investment Designation Analysis (E) Working Group
FROM:	Charles A. Therriault, Director, NAIC Securities Valuation Office Marc Perlman, Assistant Director-Investment Counsel, NAIC Securities Valuation Office Hankook Lee, Assistant Director, NAIC Structured Securities Group and Capital Markets Bureau
RE:	Proposed Amendment to the Purposes and Procedures Manual of the NAIC Investment Analysis Office (the "Purposes and Procedures Manual") to Clarify Assessment of Parent-Subsidiary Situations
DATE:	February 24, 2026

Summary: The "Parent-Subsidiary Situations" section of the Purposes and Procedures Manual (Part Three, Paragraph 38) provides specific guidelines for assessing a subsidiary issuer based on the audited financial statements of its parent holding company. The SVO has become aware that these guidelines are often read in isolation as the only way to rely on an issuer's parent's financial statements when more analytic latitude is permitted.

The SVO proposes the following update to Paragraph 38 to clarify that while the Purposes and Procedures Manual currently delineates certain prescribed guidelines for use of the financial statements of an issuing subsidiary's parent, the SVO can also rely on other information which it deems satisfactory to support such use.

Proposed Amendment –The proposed changes to the current P&P Manual are shown below with additions in red underline font color and deletions in ~~red strikethrough~~.

PART THREE
SVO PROCEDURES AND METHODOLOGY FOR PRODUCTION OF NAIC DESIGNATIONS

FINANCIAL ANALYSIS

…

Parent-Subsidiary Situations

38. In the case of transactions involving a parent holding company with an Audited Financial Statement and an issuing subsidiary without a separate Audited Financial Statement, the SVO may use the financial statements of the parent holding company as if they were prepared for the issuing subsidiary when (i) the consolidating work papers relating to the issuing subsidiary are provided, (ii) ~~or when~~ the operations of the parent: (a) are limited solely to owning the issuing subsidiary; and (b) the issuing subsidiary constitutes at least 97% of the parent's pre-tax income and assets on a consolidated basis, or (iii) the SVO has determined there is other satisfactory support for such use.

https://naiconline.sharepoint.com/teams/SVOVOSTaskForce/Shared Documents/Meetings/2026 IDAWG/2026-03 Spring National Meeting/04 Parent_Subsidiary Situations/2026-0003.01 PP_Manual_ParentSubsidiary_v3.docx

April 24, 2026

Mr. Ken Cotrone, Chair
Investment Designation Analysis (E) Working Group
National Association of Insurance Commissioners
1100 Walnut Street, Suite 1000
Kansas City, MO 64106-2197

Re: American Council of Life Insurers Comments on Items Exposed for Comment by Investment Designation Analysis (E) Working Group with comments due April 24, 2026

Dear Chair Cotrone,

ACLI appreciates the opportunity to comment on the above referenced items, which were exposed for comment by the Investment Designation Analysis (E) Working Group (Working Group) during the NAIC 2026 Spring National Meeting.

Ref #2026-002.01: Credit Rating Provider Name Update – HR Ratings LLC

ACLI supports the proposed amendment to update the credit rating provider's name in the Purposes and Procedures Manual. We view this change as a clarification that enhances accuracy and consistency in NAIC guidance, without introducing substantive changes to regulatory intent, analytical standards, or insurer reporting obligations.

Ref #2026-0003.01: Clarify Assessment of Parent-Subsidiary Situations

The Working Group proposed amendments to the Purposes and Procedures Manual of the NAIC Investment Analysis Office (P&P Manual) intended to clarify the assessment of parent-subsidiary situations. ACLI supports the objective of the exposure, clarifying that the Securities Valuation Office (SVO) may rely on audited financial statements of a parent holding company for an issuing subsidiary without separate audited financial statements where the SVO has sufficient support, including through other information deemed satisfactory by the SVO.

ACLI's comments are focused on improving clarity in the conditional structure of the proposed text, specifically the placement and interaction of the "when," "or", and "if" clauses. As drafted, the sentence structure may imply unintended dependencies between conditions or create uncertainty as to whether each prong is a standalone basis for reliance. To better reflect the intended analytical latitude described in the exposure summary and to reduce the risk of inconsistent interpretation, ACLI recommends that the conditions be presented as a clear list of independent alternatives.

American Council of Life Insurers | 300 New Jersey Avenue, NW, 10th Floor | Washington, DC 20001

Accordingly, ACLI respectfully recommends revising the exposed language to the following:

38. In the case of transactions involving a parent holding company with an Audited Financial Statement and an issuing subsidiary without a separate Audited Financial Statement, the SVO may use the financial statements of the parent holding company as if they were prepared for the issuing subsidiary when any of the following exists:

    (i) The consolidating work papers relating to the issuing subsidiary are provided;
    (ii) The operations of the parent:
        a. are limited solely to owning the issuing subsidiary; and
        b. the issuing subsidiary constitutes at least 97% of the parent's pre-tax income and assets on a consolidated basis; or
    (iii) The SVO has determined there is other satisfactory support for such use.

ACLI believes this presentation makes clear that each condition is sufficient on a standalone basis, while preserving the SVO's discretion to rely on other satisfactory information. This change is intended to be purely clarifying and does not alter the underlying substance or policy direction of the exposure.

ACLI appreciates the opportunity to provide these comments and would welcome continued dialogue regarding this proposal. Thank you for your time and consideration.

Sincerely,

Adam Knepp, CPA
Senior Director, Accounting Policy
adamknepp@acli.com
202-624-2025

cc: Amy Garcia, Vice Chair - IDAWG
Charles A. Therriault, NAIC
Marc Perlman, NAIC
Hankook Lee, NAIC

SVO

NAIC
NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

TO:	Ken Cotrone, Chair, Investment Designation Analysis (E) Working Group Members of the Investment Designation Analysis (E) Working Group
FROM:	Charles A. Therriault, Director, NAIC Securities Valuation Office Marc Perlman, Assistant Director-Investment Counsel, NAIC Securities Valuation Office Hankook Lee, Assistant Director, NAIC Structured Securities Group
RE:	Proposed Amendment to the Purposes and Procedures Manual of the NAIC Investment Analysis Office (the "P&P Manual") to Update the Filing Exempt Treatment of CLOs
DATE:	July 6, 2026

Summary: The Valuation of Securities (E) Task Force adopted an amendment on Feb. 21, 2023, to include collateralized loan obligations (CLOs) as a Financially Modeled Security in Part Four of the P&P Manual. A CLO is a type of structured security backed by a pool of debt, typically corporate loans with low credit ratings. The Task Force assigned the Structured Securities Group (SSG) the responsibility of financially modeling CLO investments and evaluating all tranche level losses across all debt and equity tranches under a series of calibrated and weighted collateral stress scenarios to assign NAIC Designations. The amendment had an original effective date beginning with year-end 2024 but that effective date was deferred several times.

Subsequent to its adoption by the Task Force, the amendment was referred to the Capital Adequacy (E) Task Force. The Capital Adequacy (E) Task Force charged the Risk-based Capital Investment Risk and Evaluation (E) Working Group (RBCIRE) with evaluating the amendment and the appropriateness of the risk-based capital (RBC) factors for CLOs. The RBCIRE engaged the American Academy of Actuaries (AAA) to study the Structured Securities Group SSG model and the appropriateness of the current RBC factors applies to CLOs. At the conclusion of the AAA study, the AAA proposed that the NAIC continue its reliance on credit rating provider (CRP) ratings instead of relying upon the SSG's financial modeling of CLO investments, as previously adopted. The AAA proposed new RBC factors for these investments, including an additional RBC factor adjustment for Broadly Syndicated Loan CLOs with an NAIC Designation Category of 2.C or below if the current tranche thickness is less than or equal to 4%. Current tranche thickness is defined as the difference between the attachment point (AP) and the detachment point (DP) of a CLO tranche. AP refers to a tranche's subordination percentage, and DP is the percentage of total par amount of the underlying portfolio including principal proceeds, that will completely write off the tranche. The current tranche thickness is to be measured using the most recent periodic report available, without being stale, as of the investment reporting date.

The AAA proposal was adopted by the RBCIRE on Jun. 23, adopted by the Capital Adequacy (E) Task Force on Jun. 30, and adopted by the Financial Condition (E) Committee on Jul. 8. It will be considered by the NAIC's Plenary during the 2026 Summer National Meeting.

Proposed Amendment – Given the policy directional changes described above, the SVO and SSG are proposing the following changes to align the P&P Manual to this new guidance, with additions in red underline and deletions in ~~red strikethrough~~. The revisions reflect that the NAIC Designation Categories for CLOs will not be based upon financial modeling by the SSG, as previously adopted, but will instead continue to be based upon Eligible NAIC CRP Ratings applied through the NAIC's Filing Exemption (FE) policy while still permitting SSG to assign NAIC Designations to CLOs which fall outside the scope of the FE policy, if the SSG is able to model or otherwise assess them.

The SSG has the ability to identify and publish a list of the Broadly Syndicated Loan CLOs with a NAIC Designation Category of 2.C or below, with or without a current tranche thickness of less than or equal to 4%, if the IDAWG or RBCIRE would like such a list to assist in the consistent identification of these securities. Producing this list would be consistent with the SVO's existing Compilation and Publication responsibilities in Part Two of the P&P Manual.

PART THREE
SVO PROCEDURES AND METHODOLOGY FOR PRODUCTION OF NAIC DESIGNATIONS

…

FE SECURITIES

Filing Exemption

3. Bonds, within the scope of SSAP No. 26R and SSAP No. 43 (excluding ~~CLO,~~ RMBS and CMBS subject to financial modeling) and Preferred Stock within scope of SSAP No. 32, that have been assigned an Eligible NAIC CRP Rating, as described in this Manual, are exempt from filing with the SVO (FE securities) with the exception of Bonds and/or Preferred Stock explicitly excluded below.

…

PART FOUR
THE NAIC STRUCTURED SECURITIES GROUP

Administrative And Operational Matters

Certain Administrative Symbols

2. The following administrative symbols are used in the Valuation of Securities (VOS) Products to identify RMBS and CMBS that the NAIC vendor has confirmed will be subject to the financial modeling methodology and application of Price Grids described in this Part.

- **FMR** – Indicates that the specific CUSIP identifies a Legacy Security RMBS that is subject to the financial modeling methodology and the application of Price Grids to determine a NAIC Designation and Designation Category.

- **FMC** – Indicates that the specific CUSIP identifies a Legacy Security CMBS that is subject to the financial modeling methodology and the application of Price Grids to determine a NAIC Designation and Designation Category

- Non-Legacy RMBS and CMBS subject to the financial modeling methodology would be assigned an NAIC Designation and Designation Category by the SSG without an administrative symbol.

- CLO ~~subject to the~~ financialy modeled~~ing~~ ~~methodology~~ , or otherwise assessed, by the SSG would be assigned an NAIC Designation and Designation Category ~~by the SSG~~ without an administrative symbol.

  NOTE: The administrative symbols **FMR** and **FMC** are related to symbols that insurers are required to use in the financial statement reporting process. Under applicable financial statement reporting rules, an insurer uses the symbol **FM** as a suffix to identify Legacy Security modeled RMBS and CMBS CUSIPs. The symbol **FM** is inserted by the insurer in the financial statement as a suffix following the NAIC Designation Category for Legacy Security RMBS and CMBS; (e.g., **2.B FM**), and for CLO and Non-Legacy RMBS and CMBS it would be left blank (e.g. **3.C**).

  The use of these administrative symbols in the VOS Product means the insurer should not use the filing exempt process for the security so identified.

Quarterly Reporting of ~~CLO,~~ RMBS and CMBS

3. To determine the NAIC Designation to be used for quarterly financial statement reporting for a ~~CLO,~~ RMBS or CMBS purchased subsequent to the annual surveillance described in this Part, the insurer uses the prior year-end modeling data for that CUSIP (which can be obtained from the NAIC) and follows the instructions in contained under the heading "Use of Net Present Value and Carrying Value for Financially Modelled Legacy Security RMBS and CMBS" or "Use of Intrinsic Price for Financially Modelled non-Legacy Security RMBS and CMBS" below, subject to, and in accordance with, *SSAP No. 43—Asset-Backed Securities*..

FILING EXEMPTIONS

Limited Filing Exemption for ~~CLO,~~ RMBS and CMBS

4. **~~CLO,~~ RMBS and CMBS that Can be Financially Modeled** – ~~CLO,~~ RMBS and CMBS that can be financially modeled are exempt from filing with the SVO. NAIC Designations for ~~CLO,~~ RMBS and CMBS that can be financially modeled are determined by application of the methodology discussed in this Part, not by the use of credit ratings of CRPs.

5. **~~CLO,~~ RMBS and CMBS securities that Cannot be Financially Modeled**

   - **But Are Rated by a CRP** – ~~CLO,~~ RMBS and CMBS that cannot be financially modeled but that are rated by a CRP are exempt from filing with the SSG. The NAIC Designations for these ~~CLO,~~ RMBS and CMBS are determined by application of the filing exemption procedures discussed in this Manual.
   - **But Are Not Rated by a CRP** – ~~CLO,~~ RMBS and CMBS that cannot be financially modeled and that are not rated by a CRP are not filing exempt and must be filed with the SSG or follow the procedures, as discussed below in this Part.

Filing Exemption for ABS

6. ABS, including CLOs, ~~rated by a CRP~~ with an Eligible NAIC CRP Rating are exempt from filing with the SSG.

…

ANALYTICAL PROCEDURES APPLICABLE TO ~~CLO,~~ RMBS AND CMBS SECURITIZATIONS SUBJECT TO FINANCIAL MODELING METHODOLOGY

Filing Exemption Status of ~~CLO,~~ RMBS and CMBS

22. ~~CLO,~~ RMBS and CMBS are not eligible for filing exemption because credit ratings of CRPs are no longer used to set risk-based capital (RBC) for ~~CLO,~~ RMBS or CMBS. ~~However, CLO, RMBS and CMBS are not submitted to the SSG.~~

Use of Financial Modeling for Year-End Reporting for ~~CLO,~~ RMBS and CMBS

23. Beginning with year-end 2009 for RMBS and 2010 for CMBS, probability weighted net present values will be produced under NAIC staff supervision by an NAIC-selected vendor using its financial model with defined analytical inputs selected by the SSG. The vendor will provide the SSG with a Intrinsic Price and/or a range of net present values for each RMBS or CMBS corresponding to each NAIC Designation and Designation Category. The NAIC Designation and Designation Category for a specific Legacy Security RMBS or CMBS is determined by the insurance company, based on book/adjusted carrying value ranges, and the NAIC Designation and Designation Category for a specific non-Legacy Security RMBS or CMBS is determined by the NAIC Designation Intrinsic Price Mapping by SSG.

ANALYTICAL PROCEDURES APPLICABLE TO FINANCIALLY MODELED CLO

24. ~~Beginning with year-end 2024 for~~ For CLOs, probability weighted net present values will be produced under NAIC staff supervision by SSG using its financial model with defined analytical inputs selected by the SSG. SSG will model CLO investments and evaluate all tranche level losses across all debt and equity tranches under a series of calibrated and weighted collateral stress scenarios to assign NAIC Designation Categories for a specific CLO tranche as determined by the NAIC.

    NOTE: Please refer to SSAP No. 43—Asset-Backed Securities for guidance on all accounting and related reporting issues.

    ~~NOTE: Effective as of January 1, 2024, SSG will financially model CLOs.~~

ANALYTICAL PROCEDURES FOR CLO, RMBS AND CMBS

Analytical Procedures for CLO, RMBS and CMBS

25. As necessary, ~~T~~the SSG shall develop and implement all necessary processes to coordinate the engagement by the NAIC of a vendor who will perform loan-level analysis of insurer-owned CLO, RMBS and CMBS using the vendor's proprietary models.

…

https://naiconline.sharepoint.com/teams/SVOVOSTaskForce/Shared Documents/Meetings/2026 IDAWG/2026-08 Summer National Meeting/05-CLO Guidance/2026-XXX.XX PP_Manual_Part_Four_CLOs.docx

To: Kenneth Cottrone, Chair, Investment Designation Analysis (E) Working Group
Members of the Investment Designation Analysis (E) Working Group

From: Charles A. Therriault, Director, NAIC Securities Valuation Office
Marc Perlman, Assistant Director-Investment Counsel, NAIC Securities Valuation Office

Re: Pacific Credit Ratings (PCR) Request to be a Credit Rating Provider (CRP)

Date: July 8, 2026

Summary: Pacific Credit Ratings (PCR), a U.S. Securities and Exchange Commission (SEC) recognized Nationally Recognized Statistical Rating Organization (NRSRO), in their memorandum dated April 7, 2026, has requested to be added to the NAIC's credit rating provider (CRP) list.

Recommendation: The SVO staff recommends the Investment Designation Analysis (E) Working Group deferring consideration of this request until after the NAIC's Credit Rating Provider Due Diligence Framework, which is currently being considered and discussed by the Credit Rating Provider (E) Work Group, has been adopted and formal administrative and technical guidance is authorized. Once the Framework, and administrative and technical guidance has been adopted, there will be a new process to assess new CRPs. The SVO staff further recommend that PCR's request be referred to the Credit Rating Provider (E) Work Group for its consideration after adoption of the Framework and its evaluation process for new CRPs.

https://naiconline.sharepoint.com/teams/SVOVOSTaskForce/Shared Documents/Meetings/2026 IDAWG/2026-08 Summer National Meeting/07-CRP Request PCR/2026-009.01 PCR CRP Request.docx

PCR | PACIFIC CREDIT RATING

April 7, 2026

Mr. Charles Therriault
Director, Securities Valuation Office
Financial Regulatory Affairs / SVO
National Association of Insurance Commissioners

RE: Application for Recognition as a Credit Rating Provider (CRP) for NAIC Filing-Exempt Status

Dear Mr. Therriault and Members of the SVO,

Pacific Credit Rating (PCR) respectfully submits this formal request for recognition as a Credit Rating Provider (CRP) for purposes of NAIC filing-exempt eligibility.

To support our expansion into the United States market, we are seeking to engage with the NAIC Securities Valuation Office to initiate the evaluation process for CRP designation.

PCR is a registered Nationally Recognized Statistical Rating Organization (NRSRO) with the U.S. Securities and Exchange Commission. PCR is currently authorized to issue credit ratings across the following asset classes:

- Corporate Issuers
- Financial Institutions
- Sovereign Issuers
- International Public Finance

Building on this authorization, our organization brings a differentiated analytical approach with depth in middle-market and emerging credit segments. We believe this perspective can provide incremental transparency and broaden analytical coverage for securities held within U.S. insurance portfolios.

PCR maintains a robust governance and control framework consistent with regulatory expectations for NRSROs. This includes clearly defined rating methodologies, independent rating committees, comprehensive conflict of interest policies, and ongoing surveillance procedures to ensure the integrity and consistency of our ratings.

We are including a chart relating PCR´s credit rating symbols to NAIC Designations.

PCR Rating	NAIC Designation	Description
AAA, AA+, AA, AA−	NAIC 1	Highest quality / minimal risk
A+, A, A−	NAIC 1	High quality
BBB+, BBB, BBB−	NAIC 2	Medium investment grade
BB+, BB, BB−	NAIC 3	Moderate speculative
B+, B, B−	NAIC 4	High risk
CCC+, CCC, CCC−	NAIC 5	Very high risk
CC, C, D	NAIC 6	Default or near default

PCR | PACIFIC CREDIT RATING

PCR agrees to enter into a legally binding agreement under which will:

- Provide Credit Rating Services to NAIC at no cost.
- Reimburse the NAIC for all costs associated with: integration of its data feed into NAIC systems, subsequent changes to NAIC systems to accommodate changes in the PCR's systems, and changes to NAIC systems as a result of the termination of credit rating services by PCR.
- Give written notice 6 months prior to terminating credit rating services.
- Agree not to claim in marketing literature that the provision of credit rating services indicates NAIC approval or endorsement of PCR, its products, or services.

We would welcome the opportunity to engage directly with the SVO to discuss our application and better understand any specific requirements or materials needed to support your evaluation.

PCR appreciates your consideration of this request and is committed to building a productive, long-term partnership with the NAIC to support the U.S. insurance market. We look forward to collaborating closely and contributing to the continued strength and transparency of the industry.

For any questions or requests for additional information, please contact Rafael Colado, Compliance Director, rcolado@ratingspcr.com at +52 56 1610 8218.

Respectfully submitted,

Oscar Jasaui
President
Pacific Credit Rating (PCR)

Outlook

FW: DBRS Addition to List of NRSROs for NAIC QUSFI List Administration

From Ferraro, Fred <fferraro@naic.org>
Date Wed 2026-07-01 10:35 AM
To Therriault, Charles <CTherriault@naic.org>

Fred Ferraro
Credit Analyst Supervisor
SVO - Financial Regulatory Affairs, NY

NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

M: 908-370-9931
W: www.naic.org

From: Ferraro, Fred
Sent: Tuesday, June 23, 2026 11:13 AM
To: 'Josh Nichols' <Josh.Nichols@morningstar.com>
Cc: Kelly, Peter <pkelly1@naic.org>
Subject: DBRS Addition to List of NRSROs for NAIC QUSFI List Administration

Good morning, Josh,

We are pleased to inform you that the NAIC Securities Valuation Office (SVO) has determined that DBRS, Inc. meets the eligibility criteria established in the Purposes and Procedures Manual of the NAIC Investment Analysis Office to be added to the NAIC's List of Nationally Recognized Statistical Rating Organizations (NRSROs) to be used to administer its List of Qualified U.S. Financial Institutions (QUSFI List).

DBRS, Inc.'s inclusion on the List is effective as of June 22, 2026. We have also added DBRS, Inc. to the list of NRSRO's Used to Monitor Institutions on the NAIC QUSFI List published on the SVO's website (see link below).

https://content.naic.org/sites/default/files/inline-files/nrsro-rating-methodoligies.pdf

Regards,
Fred

Fred Ferraro
Credit Analyst Supervisor
SVO - Financial Regulatory Affairs, NY

NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

M: 908-370-9931
W: www.naic.org

MORNINGSTAR | DBRS

DBRS, Inc.

140 Broadway, 43rd Floor
New York, New York 10005
United States

+1 212 806-3277

May 6, 2026

Charles Therriault
Director, Securities Valuation Office
Financial Regulatory Affairs/SVO
National Association of Insurance Commissioners

Dear Mr. Therriault:

DBRS, Inc.[1]—an approved NAIC Credit Rating Provider—seeks inclusion on the NAIC's List of Nationally Recognized Statistical Rating Organizations (the "List") to be used to administer the NAIC's List of Qualified U.S. Financial Institutions. In furtherance of our application of DBRS to be placed on the List, we set forth below our compliance with the requirements of Paragraphs 90 – 94 of the NAIC's Part Two Operational and Administration Instructions Applicable to the SVO ("Instructions"):

1. Since 2007, DBRS has been registered with the U.S. Securities and Exchange Commission (SEC) as a Nationally Recognized Statistical Rating Organization (an "NRSRO"), as that term is defined in the applicable federal statute.[2]

2. Pursuant to Paragraph 90 of the Instructions, DBRS has methodologies, including criteria, for assigning and maintaining credit ratings to banks and nondepository lenders which meet the following italicized NAIC requirements:

   a. *Utilize an analytical framework that assesses the incremental risk of banks and NBFIs relative to each other and incorporates as criteria in its bank and NBFI methodology the nature and robustness of regulation, access to the central bank for contingent liquidity and the stability of funding.*

      As can be observed in our Global Methodology for Rating Banks and Banking Organisations ("Global Banking Methodology")[3] and Global Methodology for Rating Non-Bank Financial Institutions ("Global NBFI Methodology")[4], our methodological frameworks explicitly point out that

---

[1] In addition to DBRS, Inc., an NRSRO, the DBRS group of companies consists of the following NRSRO affiliates: DBRS Limited, DBRS Ratings GmbH, and DBRS Ratings Limited. DBRS, Inc. and its NRSRO affiliates are referred to herein, collectively, as "DBRS."
[2] *See* SEC Office of Credit Ratings list of Current NRSROs, *available at* https://www.sec.gov/about/divisions-offices/office-credit-ratings/current-nrsros.
[3] https://dbrs.morningstar.com/research/454637/global-methodology-for-rating-banks-and-banking-organisations
[4] https://dbrs.morningstar.com/research/462007/global-methodology-for-rating-non-bank-financial-institutions

we assess various incremental risks. The core of these methodological frameworks consists of five building blocks, requiring a comprehensive assessment of all important credit factors. This also includes assessments of different regulatory environment perspectives, which can have a material impact on the credit risk of banks and NBFIs. Funding & Liquidity is one of the core building blocks, and thus the methodologies require such considerations to be assessed. Finally, among many other considerations, in both methodologies, an assessment of potential systemic support includes determining the robustness of the central banking system.

b. *Results in the expression of an opinion of the bank's or NBFI's likelihood of default on an LOC obligation and/or long-term debt obligation.*

   DBRS applies these methodologies to determine credit ratings that express opinions on the bank's or NBFI's risk of default, and clearly articulate how DBRS credit ratings are determined and how these opinions are expressed. Please see "Bank Obligations Framework" in the Global Banking Methodology. In the Global NBFI Methodology, please see "Summary of Notching Policy for NBFIs" and "Rating Approach for Secured Obligations of NBFIs".

c. *Results in the assignment of a stable credit rating, defined to mean that the NRSRO considers it unlikely that the assigned credit rating would be downgraded within one year under the moderate stress scenario specified in its credit rating criteria.*

   As per section II.C.1 of our "Credit Ratings Global Policy", which can be found in the Understanding Ratings section of our website[5], we employ a "Rating Through The Cycle Philosophy" for all of our ratings. Furthermore, in both the Global Banking and Global NBFI Methodologies, we explicitly note that we assess the issuer's resilience to stressed environments.

   In our "Rating Actions, Designations, Commentaries, and Press Releases Global Policy", "Rating Trends" have three categories: "Positive", "Stable" or "Negative". The Rating Trend indicates the direction in which DBRS considers the credit rating may move if present circumstances continue, or in certain cases, unless challenges are addressed by the issuer." Therefore, in the overwhelming majority of cases where ratings are issued with Stable Trends, it is our expectation that the rating(s) would be stable over the next 12 months, and this incorporates any stress scenarios discussed in the methodologies.

[5] https://dbrs.morningstar.com/understanding-ratings

> The Exhibit 1 credit ratings performance measurement statistics published by DBRS includes transition and default rates for a 1-year, 3-year, and 10-year time period.[6]

We appreciate your consideration of this request, and are happy to address any questions or additional requests that you may have.

Thank you,

Detlef Scholz
President
Morningstar DBRS

[6] https://dbrs.morningstar.com/about/regulatoryAffairs?region=US-NRSRO%20Disclosures&id=215034