



Roberta B. Meyer
Vice President & Associate General Counsel

November 27, 2017

The Honorable Bruce R. Ramge
Chair, NAIC Market Conduct Examination Standards (D) Working Group

Re: Draft New Annuity Standardized Data Requests, October 24, 2017 Draft

Dear Commissioner Ramge:

The American Council of Life Insurers (ACLI)¹ thanks you and the Market Conduct Examination Standards (D) Working Group (Working Group) for the opportunity to submit comments on the above-mentioned draft new Annuity Standardized Data Requests (SDR's). ACLI applauds the Working Group's efforts to streamline and update the Annuity SDR's.

Attached are ACLI comments on each of the six draft new Annuity SDR's. Although the attached include a number of comments, ACLI has no major or fundamental issues or concerns with the draft new SDR's. For the most part, the attached provide technical comments and questions seeking clarification as to the specific information sought in particular fields and the manner in which particular fields are intended to be completed. Many of our comments relate to situations where there may be multiple contract owners or annuitants, but only one field is provided for the response. A number of our other comments highlight information that a company may be unlikely to store or which is likely to be particularly challenging to produce.

ACLI is hopeful that our comments will assist the Working Group in its efforts to make the Annuity SDR's as clear and workable as possible, and to reflect appropriate flexibility, so that the SDR's will be as useful as possible.

ACLI appreciates the Working Group's consideration of our views and hopes to have the opportunity to continue to work the Working Group on this important initiative.

We would be glad to answer questions relating to any of the above or the attached.

Sincerely,

A handwritten signature in black ink, appearing to read 'Roberta B. Meyer', is written in a cursive style.

Roberta B. Meyer

Cc Petra Wallace
Market Regulation Specialist

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¹ ACLI is a Washington D.C. – based trade association with 300 member companies operating in the United States and abroad. ACLI advocates in federal, state, and international forums for public policy that supports the industry marketplace and the 75 million American families that rely on life insurers' products for financial and retirement security. ACLI members offer life insurance, annuities, retirement plans, long-term care and disability income insurance, and reinsurance, representing more than 90 per cent of industry assets and premiums.