

Wayne Mehlman Senior Counsel

November 15, 2019

Interstate Insurance Product Regulation Commission (IIPRC)
Product Standards Committee
444 North Capitol Street, NW
Hall of the States, Suite 700
Washington, DC 20001-1509
comments@insurancecompact.org.

RE: Strategic Plan

To the Management Committee:

The American Council of Life Insurers ("ACLI")¹ would like to thank the Compact for developing a draft Strategic Plan for the next three years that includes various priorities, goals and objectives, as well as action items. We support your efforts and stand ready to assist the Compact in any way possible.

We are particularly grateful to see that the following Action Item is included in Priority I (*Uniform Standards States Support and Companies Willingly Use*) since it would expand the application of the group standards to groups other than employer groups, and as a result, increase participation by group insurers in the Compact:

Develop procedures to expand the Uniform Standards to accommodate group types available in the Compacting States for the authorized product lines (other than the existing employer-employee group type).

We look forward to working with you, and if you have any questions, feel free to contact me at waynemehlman@acli.com or 202-624-2135.

Sincerely,

Wayne Mehlman

Senior Counsel, Insurance Regulation

Wayne A. Mehlman

¹ The American Council of Life Insurers (ACLI) advocates on behalf of 280 member companies dedicated to providing products and services that promote consumers' financial and retirement security. 90 million American families depend on our members for life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, dental and vision and other supplemental benefits. ACLI represents member companies in state, federal and international forums for public policy that supports the industry marketplace and the families that rely on life insurers' products for peace of mind. ACLI members represent 95 percent of industry assets in the United States. Learn more at www.acli.com.