



Illinois Department of Insurance

PAT QUINN
Governor

MICHAEL T. McRAITH
Director

December 13, 2010

Karen Z. Schutter
Executive Director
Interstate Insurance Product Regulation Commission
444 North Capitol Street, NW
Hall of the States, Suite 701
Washington, DC 20001-1509

Re: Interstate Insurance Product Regulation Compact
SB 2544

Dear Ms. Schutter:

As you are aware, the Interstate Insurance Product Regulation Compact became law in Illinois on November 29, 2010. The Illinois Department of Insurance recognizes and supports the intent of the sponsors of SB2544, and the speed-to-market priorities of the life insurance industry. We are requesting guidance from the Illinois Attorney General regarding certain technical statutory construction ambiguities associated with the implementation of this new law. During this time, the Department will issue a bulletin advising insurance companies doing business in Illinois that policy forms filed with the Interstate Insurance Product Regulation Commission are not approved for use in Illinois unless such forms are also filed directly with the Department and approved by the Illinois Director of Insurance pursuant to Section 143 of the Illinois Insurance Code.

In addition, you are hereby notified that until the Illinois Attorney General provides the requested advice and counsel, Illinois cannot implement the Uniform Standards presently adopted by the Commission, or complete our review to determine whether it will opt out of any individual standard. We anticipate that this review should be completed within 90 days with any associated rulemaking beginning shortly thereafter. Thus, you are also hereby notified that this letter serves as formal notice of the intent of the Illinois Department of Insurance to opt out with respect to participation in all Uniform Standards presently adopted by the Commission and request for the Commission to enter a stay of such Uniform Standards retroactive to December 13, 2010.

To repeat, the Department recognizes and supports the objective of SB2544, and intends to implement these objectives, as directed by the General Assembly, in a manner consistent with Illinois law.

Sincerely,

Michael T. McRaith
Director

cc: Robert E. Wagner

**BEFORE THE INTERSTATE INSURANCE
PRODUCT REGULATION COMMISSION**

In re:)	
)	No. _____
The Illinois Department of Insurance)	

REQUEST FOR TEMPORARY STAY


The Illinois Department of Insurance (“DOI”) requests that the Commission enter a stay of the Uniform Standards and in support thereof states the following:

1. On November 29, 2010, the Illinois General Assembly passed legislation known as SB 2544 making Illinois a Compacting State effective on that date.
2. The DOI recognizes and supports the intent of the sponsors of SB 2544, and the speed-to-market priorities of the life insurance industry.
3. The DOI is requesting guidance from the Illinois Attorney General regarding certain technical statutory construction ambiguities associated with the implementation of this new law.
4. During this time, the DOI will require that insurance companies doing business in Illinois that file policy forms with the Interstate Insurance Product Regulation Commission also file such forms directly with the DOI for approval by the Illinois Director of Insurance pursuant to Section 143 of the Illinois Insurance Code.
5. The DOI has commenced review of the 69 Uniform Standards presently adopted by the Commission to determine whether Opt Out is appropriate with respect to any individual standard.
6. The DOI anticipates that this review should be completed within 90 days with any Opt Out procedures for a particular Uniform Standard and associated rulemaking beginning shortly thereafter.
7. The DOI recognizes and supports the objective of SB2544, and intends to

implement these objectives as directed by the Illinois General Assembly in a manner consistent with Illinois law.

WHEREFORE, the DOI requests that the Commission grant this Request for Temporary Stay from applicability of the Uniform Standards, effective November 29, 2010, pending the DOI's receipt of advice from the Illinois Attorney General and its review of the Uniform Standards, and provide such other and further relief as is appropriate.

Respectfully submitted,



December 13, 2010

Robert E. Wagner
General Counsel
Illinois Department of Insurance
320 West Washington
Springfield, Illinois 62767