FILING INFORMATION NOTICE 2009-2

DATE: September 3, 2009

FROM: Karen Z. Schutter
       IIPRC Executive Director

RE: Multi-Company Product Filing Submissions

Statutory References: Articles II. (11), IV. (2), VII. (1), and X. (2) of the Interstate Insurance Product Regulation Compact as adopted by Member States.

Operating Procedure References: Sections 103 and 110 of the Operating Procedure for the Filing and Approval of Product Filings.

Uniform Standards Reference (e.g.): Section 1(A)(3) of the Individual Life Insurance Application Standard.

BACKGROUND:
The Interstate Insurance Product Regulation Commission (“IIPRC”) Operating Procedure for the Filing and Approval of Product Filings allows the submission of product filings to be effective in those Compacting States selected by the Product Filer in which the insurer is legally authorized to do business that have not opted out of a Uniform Standard applicable to the Product Filing. The IIPRC receives filings under the SERFF, a single point of filing platform, allowing the submission of multi-state, multi-company filings. Therefore, the IIPRC allows multi-company submissions for product filings made in accordance with Uniform Standards.

FILING PROCEDURES

To facilitate the review of multi-company product filing submissions the following should be adhered to:

- All companies shown at the top of the first or cover page of the application, rider, or endorsement form must be properly licensed in all states for which the filer is requesting approval;
- All companies shown at the top of the first or cover page of the application, rider, or endorsement form must be properly registered to file with the IIPRC;
• Forms that will be used by multiple companies must be identical (no exceptions for any company represented in the filing) in all states for which the filer is requesting approval;

• Each form in a multi-company filing shall have one form number that does not vary from company to company included in the multi-company filing and the form numbers shall be unique within each company.

• Submit the state filing fees for each company as if the filing were separate individual filings submitted through SERFF.

• Submit the IIPRC transaction fee for each company as if the filing were separate individual filings submitted through SERFF.

• Any forms included in a multi-company filing that are specific to a particular company should be identified in the filing description, numbered to clearly indicate company specificity, and only contain the name of the applicable company. Alternatively, such forms may be submitted in a separate filing particular to the specific company.

APPLICABLE IIPRC FORMS:
None.

EFFECTIVE DATE:
This Filing Information Notice is effective immediately.

CONTACT INFORMATION:
Questions regarding this Notice should be directed to:

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