NOTICE TO ALL FILERS

Until further notice, the Interstate Insurance Product Regulation Commission (“IIPRC”) is accepting product filings under Additional Standards for Intermediate Period Endowment Benefit Features for Individual Life Insurance Policies (including Return of Premium) (“Return of Premium Standard”) provided they are not submitted for “mix and match” with state-approved products and components. The IIPRC expects further clarification from its Management Committee on its July 27th conference call as to whether this particular standard can be used for “mix and match” under Section 110 of the IIPRC’s Operating Procedure for the Filing and Approval of Product Filings (“Product Filing Rule”).

On March 14, 2009, the IIPRC adopted the Return of Premium Standard which becomes effective for filing products with the IIPRC on June 25, 2009. This particular standard is not listed on Appendix A of the Product Filing Rule and members and interested parties have requested clarification on whether this standard is available for “mix and match” pursuant to Section 110 of the Rule.

The Product Standards Committee plans to conduct a public conference call in July for purposes of making a recommendation to the Management Committee on July 27th. Upon the action of the Management Committee, notice will be sent to all filers regarding the “mix and match” status of the Return of Premium Standard. We appreciate your patience as we work through this issue.

If, and when, the Return of Premium Standard is available for “mix and match”, filers are required to include an actuarial demonstration for each product combination. In other words, each combination of the Return of Premium rider and the state-approved component will require an actuarial demonstration (though it can be submitted as one comprehensive actuarial memorandum).

For additional questions regarding this notice, please contact the IIPRC Office at comments@insurancecompact.org or 202-471-3962.