

September 16, 2025

Interstate Insurance Product Regulation Commission
1101 K Street, NW
Suite 650
Washington, DC 20001

RE: Definition of “*Employer Group*” in the Amended Group Annuity Standards

Members of the Management Committee:

The American Council of Life Insurers (ACLI)¹ appreciates this opportunity to follow-up on our comments from July 31 on the Compact’s amended *Group Fixed Annuity Contract Uniform Standards*, specifically with regard to the newly proposed definition of “*Employer Group*”.

ACLI would like to propose, for your consideration, the following additional language (in red font) to the proposed definition of “*Employer Group*” in the *Group Fixed Annuity Contract Uniform Standards*. Our proposed language would expand the definition to include retirement plans that have been adopted by unrelated employers, whether private or governmental, for the benefit of their employees and beneficiaries. This would allow for group fixed annuities that are issued to multi-employer sponsored retirement plans to be filed through the Compact instead of on a state-by-state basis, which would be beneficial to state regulators, consumers and insurers.

a) An employer, or the trustees of a fund established by an employer, which shall be deemed to be the Contractholder to insure employees of the employer, and if applicable their dependents, for the benefit of persons other than the employer and must be authorized under the laws of the jurisdiction where the contract or certificate is delivered or issued for delivery;

b) The trustees, fiduciaries, or employer sponsors of a retirement plan adopted by unrelated employers for the benefit of their employees and their beneficiaries.

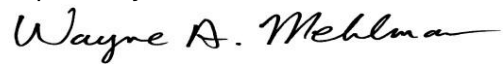
We would also suggest that the additional language be added to the definition of “*Employer Group*” in the two other amended group annuity standards that were tabled during the Compact’s Joint Meeting on August 12 in Minneapolis – *Group Annuity Certificate Uniform Standards* and *Uniform Standards for Group Guaranteed Interest Contracts for Non-Variable Annuities*.

In addition, we strongly urge that the additional language be added to the actual definition of “*Employer Group*”, and not as a Drafting Note that follows the definition.

¹ The American Council of Life Insurers (ACLI) is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. 90 million American families rely on the life insurance industry for financial protection and retirement security. ACLI’s member companies are dedicated to protecting consumers’ financial wellbeing through life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, and dental, vision and other supplemental benefits. ACLI’s 275 member companies represent 93 percent of industry assets in the United States.

Thanks again for this opportunity to provide comments. If you have any questions, please feel free to contact me.

Respectfully submitted,

A handwritten signature in black ink that reads "Wayne A. Mehlman". The signature is written in a cursive style with a long, sweeping underline.

Wayne Mehlman

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