

November 20, 2025

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

**RE: Pending Amendments to the Scope Section in the Group Annuity Standards**

Members of the Management Committee:

The American Council of Life Insurers (ACLI) would like to express our support for the Compact Office's proposed changes to the pending amendments to the Scope section of the group annuity standards, as contained in its Briefing Memo, as well as our appreciation for your willingness to address our comments and suggestions.

If you have any questions, please feel free to contact me.

Respectfully submitted,

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The American Council of Life Insurers 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.