

Comments Received from ACLI

Overall:

- Could you provide a general estimate of how long this process could typically take? After reviewing the process, it appears that from start to finish, receiving the final report may take several months. Does the pending filing remain on hold until the report is issued? Is there any way to shorten this review timeline? If resolution takes months it could significantly delay filing approvals and prompt companies to pursue state filings instead of filing through the IIPRC.

Intermediate Review Process:

- Step 2/3
 - How is a RIR submitted? Notified on the existing filing? Email submission?
- Step 10
 - If the information is relevant and was simply omitted during the initial submission - or if the Compact report included a finding that could have been addressed by that missing information - shouldn't it be reasonable to allow its inclusion? Why would accurate and pertinent information be excluded from a reconsideration request?

Compact Office Implementation of Report:

- Will the Compact office be open to rereviewing an issue that was previously brought to the Member Review Board by another company? Once the Report is issued on a subject can it ever be brought up again by another company?