

May 17, 2019

Product Standards Committee
c/o Karen Schutter
Executive Director
Interstate Insurance Product Regulation Commission

Transmitted via e-mail to: Comments@insurancecompact.org

Re: Additional Standards for Return of Premium for Individual Disability Income Insurance Policies

Dear Karen,

MassMutual appreciates the opportunity to provide comments on the above referenced standard under development.

As we reviewed the draft standard a primary question that arose was the scope of the applicability of the standard. We would to clarify that these standards do not impact the inclusion of language in policy provisions that specifically address a return of unearned premium situation. For example, a policy might include language stating that the policy terminates on the date of the insured's death and any unearned premium would be refunded.

Additionally, we may have additional technical questions that we may also forward under separate cover.

Thank you again for the opportunity to comment,

A handwritten signature in black ink, appearing to read "Hugh Barrett", with a stylized flourish at the end.