

**DATE:** August 1, 2012  
**TO:** IIPRC Management Committee  
**FROM:** Industry Advisory Committee  
**SUBJECT:** 5 Year Review of Operational Procedures and Individual Life Insurance Uniform Standards  
Notice Dated July 3, 2012

***Re: Operational Procedures***

We have no suggested changes.

***Re: Individual Life Insurance Standards***

We have several comments, mostly focused on consistency.

1. We suggest that each standard include an *index* identifying the standards that are included and their page location.
2. We suggest that each standard include the *Mix and Match* and *Self-Certification* statements.
3. We suggest that the PSC review the various ***ADDITIONAL SUBMISSION REQUIREMENTS*** in the life, annuity, disability income and long-term care standards and decide on a uniform approach to those requirements that are included in all. For example:

“If a filing is submitted on behalf of a company, a letter or other document authorizing the firm to file on behalf of the company shall be included with the filing.”

vs.

“If a filing is submitted on behalf of a company, include a letter or other document authorizing the firm to file on behalf of the company with the filing.”

4. We suggest that the PSC review the various ***VARIABILITY OF INFORMATION*** requirements in the annuity, disability income and long-term care standards and decide on a uniform approach to those requirements that are included in all.

5. We suggest that as soon as the group standards for *Accelerated Death Benefits, Waiver of Premium, Accidental Death Benefits* and *Accidental Death and Dismemberment Benefits* are finalized by the PSC, that these be compared to the individual standards. The group standards were initially based on the individual standards where it made sense to do so, and during the deliberation process, which included several regulators who were not involved in the individual standards development process, several significant changes were requested and made.

6. We suggest that the *CONFORMITY WITH IIPRC STANDARDS* language be reviewed and some consideration be given to making this clearer. Several companies who were considering filing with the IIPRC had difficulty understanding the intent.

We would be willing to work on these suggestions with the IIPRC.

Submitted by:

IIPRC Industry Advisory Committee:

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Mary Keim, State Farm Insurance Company  
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