

DATE: April 23, 2009
TO: IIPRC Management Committee
FROM: IIPRC Industry Advisory Committee
SUBJECT: Comments on Additional Standards for Market Value Adjustment Features Provided Through Separate and General Accounts

Re: Additional Standards for Market Value Adjustment Feature Provided Through a Separate Account

The Industry Advisory Committee suggests the following changes to the Scope of this standard to be clearer and more consistent with the scopes of the most recently drafted annuity standards.

Scope: These standards apply to market value adjustment (MVA) features provided through a separate account that are built into individual deferred non-variable annuity contracts (including index-linked annuities) or the non-variable portions of individual deferred variable annuities (including index-linked annuities) or added to such contracts at issue by rider, endorsement or amendment.

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Re: Additional Standards for Market Value Adjustment Feature Provided Through the General Account

The Industry Advisory Committee suggests the following changes to the Title and Scope of this standard to be clearer and more consistent with the scopes of the most recently drafted annuity standards.

ADDITIONAL STANDARDS FOR MARKET VALUE ADJUSTMENT FEATURE PROVIDED THROUGH THE GENERAL ACCOUNT

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(For use with Individual Deferred Non-Variable Annuities and general account portions of Individual Deferred Variable Annuities)

Scope: These standards apply to market value adjustment (MVA) features provided through the general account that are built into individual deferred non-variable annuity contracts (including index-linked annuities) or the general account portions of individual deferred variable annuities (including index-linked annuities) or added to such contracts at issue by rider, endorsement or amendment.

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Submitted by:

IIPRC Industry Advisory Committee:

Steve Buhr, AEGON
Tom English, New York Life
Michael Gerber, NAIFA
Dennis Herchel, Mass Mutual Life Insurance Company
Maureen Adolph, Prudential
Michael Lovendusky, ACLI
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