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**Subject:** Draft standards for group whole life  
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Hello,

Below please find Transamerica's responses to selected questions.

1. Are there are current assumption group whole life products in the marketplace and does the subgroup need to allow for them in the employer group whole life standard such as in the definition of "account value"

"Account value" is the retrospective accumulation of premiums, reduced by specified charges (which include the cost of insurance) and expenses, at no less than a guaranteed minimum interest rate. (COPIED FROM INDIVIDUAL CURRENT ASSUMPTION WHOLE LIFE STANDARD)

**Yes, such products are in the marketplace.**

2. Is there a need for the definition of Maturity Date?

"Maturity Date" is the date the Certificate Anniversary or Attained Age where the cash surrender value equals the death benefit without consideration to outstanding loans.

**The proposed definition is workable for us.**

3. Is § 4. Policy and Certificate Benefits, Q (1) referring to paying the life insurance is needed in the group whole life uniform standard.

§4. Policy and Certificate Provisions Q. MATURITY DATE OF A COVERED PERSON

(1) The certificate shall contain a statement that upon the Maturity Date as shown in the certificate, if still in force and the Covered Person is alive, the company shall pay the life insurance benefit, exclusive of additional benefits and reduced by any loan balance in lieu of portability or conversion coverage.

**Yes, this is workable.**

4. Is the reference to Maturity Date in §4. Policy and Certificate Provisions, Q (2) for a current assumption whole life policy is needed in the uniform standard.

Q (2) The Maturity Date for a current assumption whole life policy may be extended beyond the terminal age of the applicable valuation mortality table based on the following conditions:

**This is not a critical provision from our perspective.**

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