



March 27, 2024

Submitted electronically to comments@insurancecompact.org

TO: Members of the Management Committee
Interstate Insurance Product Regulation Commission

Re: *Uniform Standard for Individual Deferred ILVA Contracts (Commonly Marketed as RILAs)*

Dear Members of the Management Committee:

On behalf of our members, the Insured Retirement Institute (“IRI”)¹ writes in support of the Individual Deferred ILVA Contract Uniform Standard exposure draft. We would like to thank the IIPRC and the Product Standards Committee for its collaboration and partnership throughout this process, and we are appreciative of the work done to ensure a workable uniform standard for ILVAs to enable our insurance company members to submit product filings for review and approval of these products through the IIPRC.

We are pleased to support this uniform standard and look forward to its finalization. Please don’t hesitate to reach out if there is anything with which we can assist.

Sincerely,

Sarah E. Wood

Sarah Wood
Director, State Policy & Regulatory Affairs
Insured Retirement Institute
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¹ IRI is the leading association for the entire supply chain of insured retirement strategies, including life insurers, asset managers, and distributors such as broker-dealers, banks, and marketing organizations. IRI members account for more than 95 percent of annuity assets in the U.S., the top 10 distributors of annuities ranked by assets under management and are represented by financial professionals serving millions of Americans. IRI champions retirement security for all through leadership in advocacy, awareness, research, and the advancement of digital solutions within a collaborative industry community.

IRI is an active member of the Industry Advisory Council of the Interstate Insurance Product Regulation Commission (the “IIPRC”).