The following documents the verbal comments that we provided during today’s PSC call:

**Regarding the May 4, 2012 Comments**

We asked to delete from consideration the following items:

- Page 4, last paragraph on the page.
- Page 7, last comment for Page 36, Previous Item (c)(x)/New Item (d)(x)
- Page 9, last comment for Page 39, Previous Item (e)(xi)(C)/New Item (f)(xi)(C).

**Page 1, Scope, Second Paragraph**

We are OK with the first sentence. However, we do not understand the intent of the change made to the second sentence, and seek clarification.

**§5. POLICY AND CERTIFICATE BENEFITS**

**A. CONTINUATION OF INSURANCE**

*Page 30, Item (1)(d)*

The item should have referred to both Employees and Dependents, so we suggest the following changes:

“The provisions shall state that if a Covered Person dies during the continuation period, the insurance company shall pay the certificate death benefit to the Beneficiary upon receipt of Proof of Loss establishing that the Covered Person died during the continuation period. The conversion provision of the certificate shall describe the conversion right available to all other Covered Persons; and”
A. CONTINUATION OF INSURANCE
Page 32, Item (4)(c)

In the first sentence, we suggest changing “at the end of the continuation periods” to say “at the end of a continuation period.”

B. PORTABILITY
Page 32, Current Item (1)(b)

The current “if the certificate is in effect” language begs the question of “when?”, so we suggest the following changes:

“The provisions shall state that the portability coverage is available if the certificate is in effect at the time of the event giving rise to a person’s eligibility to port coverage, and that portability coverage shall only be available for amounts of group term life insurance for which no application to convert has been made;”

Generally, only Employees have the right to port, but to account for the odd situation where another insured may have the right to port, we prefer to say “a person”.

B. PORTABILITY
Page 33, Current Item (1)(i)

In the first sentence, we suggest changing the “may” to a “shall”.

In the second sentence, we suggest changing “coverage was received” to say “coverage is received.”

C. CONVERSION
Page 34, Current Item (1)(a)
Page 35, Current Item (1)(c)(ii)

These two standards are somewhat at odds, so we suggest changing the Page 34 item to say:

“The provision shall state that evidence of insurability is not required if a Covered Person applies for the conversion policy and pays the required Premium, and the insurance company receives such application and Premium, during the specified conversion period of at least 31 calendar days after the date on which group term life insurance ends or is reduced.”
Submitted by:

IIPRC Industry Advisory Committee:

Bill Anderson, NAIFA
Tom English, New York Life
Mary Keim, State Farm Insurance Company
Miriam Krol, ACLI
Amanda Matthiesen, AHIP
Jill Morgan, Symetra
Marie Roche, John Hancock