



June 15, 2022

Submitted electronically to kschutter@insurancecompact.org

Interstate Insurance Product Regulation Commission
444 North Capitol Street, NW
Hall of the States, Suite 700
Washington, DC 20001-1509

Re: *Position Statement 1-2022*

To the Commission:

On behalf of our members, the Insured Retirement Institute, Inc. (“IRI”)¹ appreciates the opportunity to comment on Position Statement 1-2022 (“Position Statement”) put forth by the Interstate Insurance Product Regulation Commission (“Commission”) regarding the issue of congressional consent.

IRI strongly supports the Position Statement put forth by the Commission. The Insurance Compact plays an important role for our members by providing a central and uniform review and approval process for certain insurance products. We support and appreciate the analysis done by the Commission, which ultimately recognizes the consent of Congress to the Insurance Compact and that the Commission’s Uniform Standards and other rules have the protection of the Supremacy Clause.

On behalf of IRI and our members, thank you again for the opportunity to provide these comments and a statement of support. We would be happy to discuss further with you and look forward to continued collaboration and partnership with the Commission.

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.