Please accept the following comments on the Group Annuity Certificate Uniform Standards for Employer Groups (RNUS 2019-3). Note that I am commenting as an interested regulator and not presenting a position of the Pennsylvania Insurance Department.

The following edit is suggested for item (2) of § 4 J. Payment of Benefits, to reinforce the intent of the provision and mirror state requirements.

- (2) If the contract allows adjustment of annuity payments as a result of a misstatement of age, sex or other relevant data; compliance with court orders or applicable law, or overpayments or underpayments, the certificate shall contain a provision describing an equitable adjustment to annuity payments adjustments for the reasons listed in the contract.

Similarly, the following edit is suggested for item (2) of § 4 K. Payment of Premium.

- (2) If the contract allows adjustment of premium payments as a result of a misstatement of age, sex or other relevant data; compliance with court orders or applicable law, or overpayments or underpayments, the certificate shall contain a provision describing an equitable adjustment to premium payments adjustments for the reasons listed in the contract.

Thank you for considering the above comments. A similar comment was submitted for RNUS 2019-2.

Tom
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