Our teams have reviewed the draft standards for Single Premium Group Fixed Annuity Contract Uniform Standards and have the following comments for the upcoming public meeting. If possible, we would like to remain anonymous.

1. **Scope (p1)**

   The Scope paragraph states “The contracts may provide benefits to eligible Plan participants who are Annuitants and their Beneficiaries.”

   At times, there could be Alternate Payees who would receive benefits/benefit payments under a Plan, such as in the case of QDROs (Qualified Domestic Relations Order).

   Perhaps the addition of a definition for Alternate Payee or clarification that such payees are permitted under these Plans would be helpful.

2. **Definition of “Contract” in regards to the Standards (p1)**

   The definition of contract on page 1 includes a reference to “notices or other attachments” to the contract.

   Is there a better word that can be used in lieu of “notices”?

   It is our general understanding that the IIPRC does not regulate notices used in the normal course of business nor do they confirm compliance with any state mandated notices; however, we believe this term could be better clarified to prevent any confusion as to what notices would be subject to filing/review by the IIPRC.

3. **§2A.(5) – Issuance of Certificates (p4)**

   We ask the IIPRC to clarify the persons for which a certificate will be issued as being the primary annuitant/insured.

   “Each person” could be too broad as certificates are not generally issued for contingent annuitants or beneficiaries.

4. **§4C(1)(b) – Arbitration (p7)**

   The standards indicate arbitration should be held in the city or county where the owner or Beneficiary lives.

   Why would arbitration not be conducted in the state in which the contract was issued?

   Do the applicable rules of the AAA cover this scenario?

Thank you for the opportunity to provide comments, we look forward to participating in the call.