Re: Uniform Standards for Group Guaranteed Interest Contracts for Non-Variable Annuities for Employer Groups, Draft
Dated November 27, 2018

I suggest that this standard should include language that contemplates index-linked crediting features as is provided in the
standards for individual non-variable annuities (IIPRC-A-07-I-1). A guaranteed minimum credited rate of 0% (or greater)
would be appropriate for index-linked crediting.

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