The state of Maryland would like to take this opportunity to thank ICC for their work on this new Standards for Group Single Premium Fixed Annuities. We appreciate the opportunity to make comments.

We have reviewed the new Standards for Single Premium Group Fixed Annuity Contract Uniform Standards and wish to make the following comments:

1. The reference to "Separate Accounts" under the Scope section on page 1 must be removed. Fixed Annuity contracts whether individual or group contracts should not have separate accounts where the benefits can be variable.

2. The Annuity Schedule section on page 6 must be revised to define the calculation of the minimum amount of annuity benefits. It is acceptable to include a table and the basis of calculation that can include interest rate as well as mortality table used to compute these minimum annuity payments.

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