



**Wayne Mehlman**  
*Senior Counsel*

July 29, 2019

Interstate Insurance Product Regulation Commission (IIPRC)  
Product Standards Committee  
444 North Capitol Street, NW  
Hall of the States, Suite 700  
Washington, DC 20001-1509  
[comments@insurancecompact.org](mailto:comments@insurancecompact.org).

**RE: Proposed Compact Strategic Planning Framework**

To the Members of the IIPRC:

The American Council of Life Insurers (“ACLI”)<sup>1</sup> appreciates this opportunity to submit the following comments on your *Proposed Compact Strategic Planning Framework*.

Our comments relate specifically to the Compact’s group standards. The three group annuity standards that are currently under consideration by the IIPRC -- those relating to pension risk transfers, group guaranteed interest contracts for non-variable annuities and group annuity certificates -- would only apply to employer groups. We would strongly encourage the IIPRC to expand eligible group types beyond employer groups as part of its strategic priorities, goals and objectives for the next three years, not just for group annuity standards, but for all of the Compact’s group standards.

One of the obstacles that prevent more group insurers from filing through the Compact is the inability to use Compact forms for groups other than employer groups. We believe that if insurers had the ability to utilize these forms for other eligible group types, it would increase the volume of carriers filing group forms through the Compact. We, therefore, urge the IIPRC to consider making Compact forms available for non-employer groups.

There are a number of ways in which the IIPRC can expand the eligible group types and we believe the it would be beneficial to discuss and evaluate the feasible options. One option, which we believe is the best long-term solution, is to add eligible groups to the Compact’s group standards. If that is not feasible in the near-term, an interim step would be to have the IIPRC and the compacting states agree that Compact forms can be used with other group types (e.g., associations, labor unions, multiple employer trusts), so long as any applicable compacting states approve the groups themselves if such approval is required.

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<sup>1</sup> The American Council of Life Insurers (ACLI) advocates on behalf of 280 member companies dedicated to providing products and services that promote consumers’ financial and retirement security. 90 million American families depend on our members for life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, dental and vision and other supplemental benefits. ACLI represents member companies in state, federal and international forums for public policy that supports the industry marketplace and the families that rely on life insurers’ products for peace of mind. ACLI members represent 95 percent of industry assets in the United States. Learn more at [www.acli.com](http://www.acli.com).

Should the IIPRC agree to our request to expand the application of the Compact's group standards, we would like to have further discussions with you on how to specifically do so.

If you have any questions, feel free to contact me at [waynemehlman@acli.com](mailto:waynemehlman@acli.com) or 202-624-2135.

Sincerely,

A handwritten signature in black ink that reads "Wayne A. Mehlman". The signature is written in a cursive style with a long horizontal flourish at the end.

Wayne Mehlman  
Senior Counsel, Insurance Regulation