Re: Group Term Life Insurance /Accelerated Death Benefits

Page 2, Item (e)(i)

We suggest changing the end to say “or similar forms of dementia.”

Page 2, Item (2)

The second sentence is not clear with regard to what is meant by “cumulative”, and the last sentence leaves one asking “sufficient” for what? We suggest the following substitute language for both sentences:

“If the Accelerated death benefit provides multiple Qualifying events, meeting the conditions of any one specified Qualifying events shall be sufficient to entitle the Covered Person to accelerate the death benefit.”

Re: GMDB Standards

Regarding the recommended changes to item (2), we initially thought that the phrase “excluding any bonuses....” should be added at the end of the text in the parenthesis since it appeared to “interrupt” what was there before, but the more we looked at it the more we realized that it is not much better, either.

In case someone wants to consider another approach, here is what we initially thought of suggesting:

“(defined as the account value, less premiums paid plus withdrawals, excluding any bonuses that are not fully earned), provided....”.

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