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January 3, 2018

Ms. Mary Mealer
Chair, Life Insurance Buyer's Guide (A) Working Group
National Association of Insurance Commissioners
Via Email: Jennifer Cook (JCook@naic.org)

Re: Comments on the "CEJ Expanded Outline" Exposure Draft

Dear Ms. Mealer,

The Non-Guaranteed Elements (NGE) Work Group of the American Academy of Actuaries¹ appreciates the opportunity to comment on the "CEJ Expanded Outline." We understand that this expanded outline is intended to be the foundation for an interactive buyer's guide. We will plan to offer specific, substantive comments once a draft of the buyer's guide is exposed; however, because the outline is still in development, we would encourage you to go ahead and include specific mention of NGEs.

The following are just a few of the concepts related to NGEs that consumers often do not understand:

- What are NGEs?
- What are the advantage and disadvantages of NGEs?
- What types of products usually have NGEs?
- Are there limits to when and how much the NGEs can change?
- How do I monitor changes to my policy's NGEs?

We look forward to continuing to provide input on the working group's efforts. Please contact Ian Trepanier, the Academy's life policy analyst (trepanier@actuary.org; 202-785-7880), if you have any questions.

Sincerely,

Gabe Schiminovich, MAAA, FSA
Chairperson, Non-Guaranteed Elements Work Group
American Academy of Actuaries

¹ The American Academy of Actuaries is a 19,000-member professional association whose mission is to serve the public and the U.S. actuarial profession. For more than 50 years, the Academy has assisted public policymakers on all levels by providing leadership, objective expertise, and actuarial advice on risk and financial security issues. The Academy also sets qualification, practice, and professionalism standards for actuaries in the United States.