



# State of Wisconsin / OFFICE OF THE COMMISSIONER OF INSURANCE

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DATE: June 5, 2009  
TO: David Vacca, NAIC  
FROM: Roger A. Peterson  
SUBJECT: Group Solvency Issues WG Questionnaire - Group-wide International Activities and Issues

Wisconsin provides the following comments regarding group-wide international activities and issues that the Task Force should consider:

- Changes that are inconsistent with or detract from legal entity level solvency and receivership laws will weaken, not strengthen, our solvency protections. Group-wide considerations should be subordinate and/or supplemental to entity level requirements.
- To the extent that group-wide capital is relied upon to maintain minimum entity level capital, we recommend establishment of a statutory structure that prescribes the form of capital maintenance agreements and provides for improved enforceability.
- NAIC budget should provide resources necessary to support communication and coordination between international and lead state regulators. While international travel is expected to be limited, some face-to-face meetings between the relevant regulators seems advisable and approvals of such expenses within state budget processes are likely to be difficult.
- The NAIC could assist communications between state and international regulators by maintaining contact information on relevant foreign regulators and by providing assistance with technology improvements such as video conferencing.