MEMORANDUM

To: Persons Interested in SVO Filing Procedures and Practices
From: Charles Therriault, Director, NAIC Securities Valuation Office
Re: How to Obtain Code 99 Letters for 2014 Year-End Securities Properly Filed with the SVO
Date: January 14, 2015

1. **Year End Filing Process** – The *Purposes and Procedures Manual* provides that insurers that are required by state law to report an NAIC Designation shall file their investment securities or transactions with the SVO for the assignment of an NAIC Designation (unless exempt from such filing). Any insurer owned security required to be filed with the SVO must be filed within 120 days after its initial purchase and annually resubmitted prior to September 1 of each subsequent reporting year. Because the SVO may not be able to provide an NAIC Designation to the insurer for a security purchased in the year-end time period, insurers are permitted to self-designate and report a security to its regulators with the administrative symbol Z provided the insurer complies with the 120 day rule defined in Part Two, Section 5(d) of the *Purposes and Procedures Manual*. The Z process permits the insurer to timely file its financial statement blank with state insurance regulators and permits the SVO to complete its year-end assessment obligation to the regulatory community after year-end.

2. **The Code 99 Letter Communication** - When the year-end process concludes the SVO must compile and publish the content of the system into the VOS Products. This means one year’s electronic record is closed and the new filing year’s record commenced. NAIC Designations for insurer owned securities properly filed with the SVO for that year-end and assessed by the SVO after the year-end process ends therefore cannot be entered into the SVO system for that filing year but are recorded in the current year’s database. NAIC Designations assigned to such securities are disseminated through the Code 99 Letter instead. The Code 99 Letter conveys the result of SVO’s credit risk for a security to the insurer that filed it and is intended to be used by the insurer as confirmation to its state insurance regulator and examiners that the insurer complied in all respects with NAIC filing requirements.

3. **How to Obtain Your Code 99 Letter** – The Securities Valuation Office has posted onto the [NAIC website](http://www.naic.org) and on the AVS+ system a listing of the securities that will be processed as a Code 99 in 2015 for the 2014 filing year. The SVO will send a Code 99 Letter to the filer of record in its system after it has completed the analysis. Any other insurer holding the security may also request a copy of the Code 99 Letter. The list of Code 99 securities will be periodically updated to reflect the status of these securities.

Please contact the SVO Inquiry Desk if you have any questions at: [SVOInquiryDesk@naic.org](mailto:SVOInquiryDesk@naic.org) or call 212.398.9000.
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### Outstanding Status of "Code 99" Letters for 2014 Year-End Securities Properly Filed with the SVO

**Updated: 3/16/15**

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Updated: 3/16/15

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## Outstanding Status of "Code 99" Letters for 2014 Year-End Securities Properly Filed with the SVO
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Updated: 3/16/15

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### Outstanding Status of "Code 99" Letters for 2014 Year-End Securities Properly Filed with the SVO

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Outstanding Status of "Code 99" Letters for 2014 Year-End Securities Properly Filed with the SVO
Updated: 3/16/15
## Outstanding Status of "Code 99" Letters for 2014 Year-End Securities Properly Filed with the SVO

Updated: 3/16/15

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## Outstanding Status of "Code 99" Letters for 2014 Year-End Securities Properly Filed with the SVO

Updated: 3/16/15

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