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President and CEO

September 21, 2018

Mike Boerner, Chair, NAIC Life Actuarial Task Force  
Attn: Reggie Mazyck – [Rmazyck@naic.org](mailto:Rmazyck@naic.org)

Re: [APF 2018-08](#) Removal of RBC Requirements from the Life PBR Exemption

Dear Mike:

The American Fraternal Alliance (Alliance) appreciates the opportunity to provide comments regarding APF 2018 -08 relating to the removal of RBC requirements from the Life PBR Exemption.

The Alliance supports this proposal and appreciates the deliberate steps which the NAIC is taking as this action will have a positive impact on many small to mid-size fraternal and commercial life insurers.

We welcome the opportunity to continue to work with NAIC and other industry representatives on this and other matters that impact many small to mid-sized life insurers. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Annotti".

Joseph J. Annotti  
President and CEO