Original: 2081

Mcginley

cc: Sandusky

de Bien Wilmarth Legal The Insurance Federation of Pennsylvania, Inc.

1600 Market Street Suite 1520 Philadelphia, PA 19103 Tel: (215) 665-0500 Fax: (215) 665-0540

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REVIEW CO. HASSION

April 3, 2000

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Sarah H. Lawhorne

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Danielle Witwer

Director of

Government Affairs

Robert E. Nyce, Executive Director

Independent Regulatory Review Committee

14th Floor

333 Market Street

Harrisburg, PA 17101

Re: Valuation of life insurance Policies - 31 Pa.

Code Chapter 84c

Dear Mr. Nyce:

As this regulation is set to be deemed approved at the IRRC's April 17 meeting, I just wanted to note the Insurance Federation's support for it.

While we sought a retroactive effective date of January 1, we appreciate that retroactivity is generally not permitted. I guess our asking for it shows just how much we support the regulation.

Sincerely,

ser Messey

Samuel R. Marshall

c: Peter J. Salvatore, Regulatory Coordinator Pennsylvania Insurance Department