

**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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INDEPENDENT REGULATORY  
 REVIEW COMMISSION  
 March 17, 2000

**John R. Doubman**  
 Secretary & Counsel

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Office of Special Projects

Peter J. Salvatore,  
 Regulatory Coordinator  
 Pennsylvania Insurance Department  
 1326 Strawberry Square  
 Harrisburg, PA 17120

Re: Premium and Retirement Deposit Funds: 31 Pa. Code  
 Chapter 86; 11-188

Dear Mr. Salvatore:

The Insurance Federation supports the proposed regulation providing for deposit limits held in premium deposit funds and retirement deposit funds for both fixed premium and flexible premium life policies and annuity contracts. The regulation as published in the February 19 Pennsylvania Bulletin is a viable modernization of Chapter 86. The Federation will be happy to work with the Insurance Department toward implementing the regulation as soon as practicable.

Thank you for the opportunity to comment on the regulation. Feel free to call with any questions or comments.

Sincerely,



John R. Doubman

c: Robert E. Nyce, Executive Director  
 Independent Regulatory Review Commission

Honorable Edwin G. Holl, Chairman  
 Senate Banking and Insurance Committee

Honorable Nicholas A. Micozzie, Chairman  
 House Insurance Committee