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INDEPENDENT REGULATORY REVIEW COMMISSION

John R. Doubman
Secretary & Counsel

December 9, 2003

Robert E. Nyce
Executive Director
Independent Regulatory Review Commission
333 Market Street
Harrisburg, PA 17101

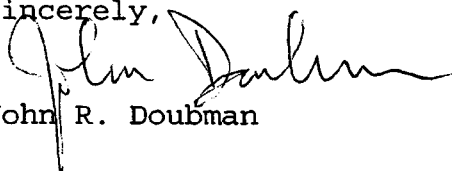
**Re: Insurance Department 2001 CSO Mortality Table Recognition
Regulation;
Fiscal Note 11-218, 31 Pa. Code Chapter 84d**

Dear Mr. Nyce:

The Insurance Federation supports the captioned final form regulation to be considered by the Independent Regulatory Review Commission on December 18, 2003. The regulation adds Chapter 84d recognizing the use of the 2001 CSO Mortality table for use in determining minimum nonforfeiture standards and minimum standards for valuation.

This will place the Federation's approval on record.

Sincerely,


John R. Doubman

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

Richard M. Sandusky, Senior Regulatory Analyst
Independent Regulatory Review Commission