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**PRIMERICA**

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January 21, 2010

Peter J Salvatore, Regulatory  
Insurance Department, Bureau of Administration  
1326 Strawberry Square  
Harrisburg, PA 17100

RE: Pennsylvania Proposed Chapter 39.a

Dear Mr. Salvatore:

Thank you for the opportunity to provide comments on the above proposed Chapter. We respectfully request for the Department to maintain the current minimum two year experience as an insurance producer in the subject matter being taught and not increase this requirement to three years as proposed in section 39.a.8.(3).

With the current economic market producer retention rates have been severely affected. There have been a number of studies indicating retention rates as low as sixteen percent for some insurance companies. In addition older more experience producers are leaving the industry, all of this making it extremely difficult for providers to find potential instructors with 3 years experience.

Thank you for your attention to this matter.

Sincerely,



Cindee Chavis

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