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Samuel R. Marshall
President & CEO

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RECEIVED
IRRC

Bridget E. Burke
Regulatory Coordinator
Pennsylvania Insurance Department
1341 Strawberry Square
Harrisburg, PA 17120

Re: Insurance Department Proposed Regulation 11-255 – annuity mortality tables

Dear Bridget:

The Insurance Federation supports the Department's proposed regulation, with appreciation for the collaborative efforts that went into its drafting.

In fact, we support this regulation so strongly that we recommend it take effect immediately upon final-form publication in the Pennsylvania Bulletin. Annuity writers are ready for prompt implementation of this regulation, as is the Department – so this may be one where neither side needs a 30 day lead time.

Sincerely,

Samuel R. Marshall

C: Corinne R. Brandt, IRRC
Fiona E. Wilmarth, IRRC