



March 26, 2008

To Members of the NAIC Executive Committee:

The Honorable Sandy Praeger, Chair
NAIC Executive Committee
Department of Insurance
420 S.W. 9th Street
Topeka, Kansas 66612

The Honorable Jane L. Cline, Vice President
NAIC Executive Committee
Insurance Commission
1124 Smith Street
P.O. Box 50540
Charleston, West Virginia 25305-0540

The Honorable Roger Sevigny, Vice Chair
NAIC Executive Committee
Department of Insurance
21 South Fruit Street, Suite 14
Concord, NH 03301

The Honorable Susan Voss, Secretary-Treasurer
NAIC Executive Committee
Division of Insurance
330 Maple Street
Des Moines, Iowa 50319-0065

Re: Request for NAIC EX Committee Action on the Senior Designation Issue

As you are aware, the use of improper and/or misleading professional designations and credentials by a limited number of life insurance producers has garnered widespread attention. Recent legislative developments in several states and consideration in Congress have in our view underscored the necessity of NAIC leadership on this issue. Given the accelerated pace at which this issue is moving, only prompt action by the NAIC Executive Committee at the upcoming Spring National Meeting will ensure a coherent, uniform insurance regulatory solution.

We applaud your efforts to address this issue through consultations with the North American Securities Administrators Association ("NASAA"), with the goal being to arrive at a uniform state regulatory approach that will address the sale and marketing of both insurance and securities/investment products. We similarly appreciate the work of the Life Insurance "A" Committee in circulating insurer/producer and consumer Model Bulletins for discussion earlier this year. Any comprehensive solution to this issue will necessarily require the active participation of the NAIC.

NAIFA, ACLI and the American College have been following this issue closely and have provided input to, among others, Congress, individual states, NASAA, NCOIL and the NAIC. It is our collective judgment that at this time the best vehicle to provide clarity to consumers, producers and companies is an approach based on the November 9, 2007 version of the proposed NASAA Model Rule on the Use of Senior Specific Certifications and Designations, amended to incorporate the recommendations made by The American College in its comment letter to NASAA dated November 15, 2007 (attached; also attached are the original and edited versions of the November 2007 NASAA draft) to take into account insurance products and producers. Support from the NAIC for this approach would result in a unified insurance community response that puts consumers first.

We urge the NAIC Executive Committee to take this unique opportunity to lead the entire life insurance industry toward an effective solution to a burgeoning issue by taking definitive action in Orlando. Our organizations look forward to working with you, and providing whatever support is needed to put in place strong, uniform protections for senior consumers.

Sincerely yours,

American Council of Life Insurers

National Association of Insurance
and Financial Advisors

The American College