

August 17, 2015

Massachusetts Division of Insurance
1000 Washington Street
Boston, MA 02118-6200

Attention: Robert Whitney, General Counsel

Re: 211 CMR 39.00: ANNUITY MORTALITY TABLES FOR USE IN DETERMINING RESERVE
LIABILITIES FOR ANNUITIES

2012 Individual Annuity Reserve (IAR) table

Dear Mr. Whitney:

In the interest of uniformity and modernization we would like to encourage Massachusetts to adopt the 2012 IAR table either retroactively for annuity contracts issued on or after January 1, 2015, or effective January 1, 2016. Thirty-five (35) states have adopted the IAR table, and several others have proposals pending for adoption.

Adoption will ensure that carriers have an even playing field in a competitive environment for their annuity business. There is a continuing competitive disadvantage against carriers in non-adopting states.

Thank you for your consideration of this matter.

Respectfully,

Susan Giacalone
Government Affairs Officer – New England
U.S. Federal and State Government Affairs
American International Group, Inc
200 Glastonbury Blvd. – Suite 301
Glastonbury, CT 06033
860-652-4802 (work)
860-266-8305 (cell)