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Via E-Mail to regs.comments@federalreserve.gov

December 12, 2016

Janet Yellen
Chair
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, D.C. 20551

Docket No. R-1550 and RIN 7100-AE-61

Re: Request for Extension: Advanced Notice of Proposed Rulemaking on Enhanced Cyber Risk Management Standards

Dear Chair Yellen,

On behalf of the American Council of Life Insurers (the "ACLI"),¹ and its 280-member life insurance companies, we are writing to request an extension of time to allow us to adequately review and comment upon the advance notice of proposed rulemaking (ANPR) on enhanced cyber risk management standards. The current ANPR currently provides a comment deadline of January 17, 2017. We request that an additional 60 days be afforded to ensure a careful analysis and feedback on this unique issue.

As you are aware, the ANPR requests an extensive amount of information which will be difficult to collect, gather, and analyze effectively within the current 90-day comment period. In addition, the current comment period corresponds with three major holidays (Thanksgiving, Christmas, and New Year's Day) and with companies preparing for their year-end regulatory obligations. Providing 60 additional days would greatly assist in providing the most constructive information possible.

Therefore, ACLI strongly urges the Federal Reserve Board to extend the time period for comment on the ANPR by an additional 60 days beyond the current January 17, 2017 deadline. Thank you for your consideration of these comments, and please contact me should you have any questions.

Sincerely,

Jigar Gandhi

¹ American Council of Life Insurers (ACLI) is a Washington, D.C.-based trade association with 280 member companies operating in the United States and abroad. ACLI advocates in state, federal, and international forums for public policy that supports the industry marketplace and the 75 million American families that rely on life insurers' products for the financial and retirement security. ACLI members offer life insurance, annuities, retirement plans, long-term care and disability income insurance, and reinsurance, representing more than 95 percent of industry assets, 92 percent of life insurance premiums, and 97 percent of annuity considerations in the United States. Learn more at www.acli.com.