

July 6, 2016

Robert deV. Frierson
Secretary
Board of Governors of the Federal Reserve System
20th Street & Constitution Ave., NW
Washington, DC 20551

Request for Extension: Advance Notice of Rulemaking on Capital Requirements for Supervised Institutions Significantly Engaged in Insurance Activities (Docket No. R-1539 & RIN 7100 AE 53)

Dear Mr. Frierson:

On behalf of the American Council of Life Insurers (“ACLI”)¹ and the American Insurance Association (“AIA”),² we are writing to request an extension of time to allow us to adequately review and comment on the advance notice of proposed rulemaking on capital requirements for supervised institutions significantly engaged in insurance activities (“ANPR”). The ANPR currently provides a comment deadline of August 17, 2016. We respectfully request that an additional forty-five (45) days, or a minimum of an additional thirty (30) days, be afforded interested parties to ensure careful and thorough analysis and feedback.

The ANPR is an important precursor to the Federal Reserve Board’s (“Board”) ultimate rulemaking on a subject of immense importance to our respective member companies. The degree of importance in ensuring that the Board receives the highest level of thoughtful, comprehensive and analytical commentary from all interested and affected parties cannot be overstated. Given that there are currently multiple regulatory initiatives that the industry is working to respond to in a timely fashion, we are very concerned that the current deadline for comments on the ANPR will not accommodate the need for this level of feedback and input.

For example, we are currently working on responding to two separate notices of proposed rulemaking (“NPR”) published by the Board, one with a deadline of July 22, 2016 (Incentive-based Compensation Arrangements NPR-Docket No. 1536, RIN No. 7100 AE-50) and the other with a deadline of August 17, 2016 (Enhanced Prudential Standards for Systemically Significant Insurance Companies NPR-Docket No. R-1540; RIN 7100 AE-54). In addition to the Board’s NPRs, the International Association of Insurance Supervisors (IAIS) will release the second consultation on its Insurance Capital Standard proposal in mid-July. The consultation is expected to have more than 200 questions and a deadline for interested party responses in early October, 2016. Many of our member companies are also IAIS field testing volunteers, and are under-going a time and resource consuming period of quantitative field testing this summer.

Therefore, ACLI and AIA strongly urges the Federal Reserve Board to extend the period of time for comment on the ANPR by an additional forty-five (45) days, or a minimum of an additional thirty (30) days, beyond the current deadline of August 17, 2016.

Very Truly Yours,



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cc: Thomas Sullivan
Linda Duzick

¹ The ACLI is a Washington, D.C.-based trade association with 284 member companies operating in the United States and abroad. ACLI advocates in federal, state, and international forums for public policy that supports the industry marketplace and the 75 million American families that rely on life insurers’ products for financial and retirement security. ACLI members offer life insurance, annuities, retirement plans, long-term care and disability income insurance and reinsurance, representing more than 90 percent of industry assets and premiums.

² AIA represents approximately 325 leading U.S. insurance companies that provide all lines of property-casualty insurance to consumers and businesses in the United States and around the world. AIA members write more than \$127 billion annually in U.S. property-casualty premiums and approximately \$225 billion annually in worldwide property-casualty premiums. AIA’s membership includes U.S. insurers that write insurance only within the U.S., U.S. insurers that write insurance inside and outside the U.S., and the U.S. subsidiaries of multi-national insurers.