

## **Life Actuarial (A) Task Force Exposure 4/4/24: APF 2024-06 and Exposure Questions**

**Please include comments on the exposure questions in addition to language in APF 2024-06 (on page 2).**

1. Should the use of jumbo rates for non-jumbo contracts, if elected, be for 1) all non-jumbo contracts, 2) all non-jumbo contracts issued after a given date, or 3) a company-selected subset of contracts with justification from the company (e.g., a company revising the cutoff for jumbo vs. non-jumbo)?

**Bill Carmello: Answer 2 or 3 but the date should be after the effective date of the VM change**

2. Once the company has elected the use of jumbo rates for non-jumbo contracts, should they be allowed to subsequently switch back to non-jumbo rates? If so, should there be a limit to how frequently the company may switch, such as every 3-5 years?

**Bill Carmello: No**

3. Should domiciliary commissioner approval be required for the initial election of jumbo rates and/or for any subsequent changes between jumbo and non-jumbo rates?

**Bill Carmello: Yes**