

Mike Monahan

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June 2, 2024

Ms. Carrie Mears

Chair, Valuation of Securities (E) Task Force (VOSTF)
National Association of Insurance Commissioners (NAIC)
110 Walnut Street, Suite 1500
Kansas City, MO 64106-2197

Re: Proposed P&P Manual Amendment to Permit NAIC Designations for Short-term ABS

Dear Ms. Mears:

The undersigned (ACLI, PPIA, and NASVA) appreciate the opportunity to comment on the exposure referred to above that was released for comment by the VOSTF on May 2, 2024.

We support the exposure as drafted. ACLI is very appreciative and supportive of the VOSTF. ACLI stands ready to continue working with the NAIC.

If you have any questions regarding this letter, please do not hesitate to contact us.

Sincerely,



Mike Monahan
ACLI

Tracey Lindsey

Tracey Lindsey
NASVA

John Petchler

John Petchler
on behalf of PPIA Board of Directors

cc: Charles Therriault, Director, Securities Valuation Office
Eric Kolchinsky, Director, Structured Securities Group