



January 22, 2019

**VIA ELECTRONIC MAIL**  
[rule-comments@sec.gov](mailto:rule-comments@sec.gov)

Mr. Brent Fields  
Secretary  
U.S. Securities and Exchange Commission  
100 F Street N.E.  
Washington, DC 20549-1090

**Re: REQUEST FOR EXTENSION OF COMMENT PERIOD**

**File No. S7-23-18**

**Updated Disclosure Requirements and Summary Prospectus for Variable Annuity and Variable Life Insurance Contracts**

**Release Nos. 33-10569; 34-84508; IC-33286**

Dear Commissioners:

The Committee of Annuity Insurers (the "Committee")<sup>1</sup> respectfully submits this letter in response to the proposals of the Securities and Exchange Commission (the "Commission") to modernize the disclosure requirements for variable annuity and variable life insurance products, and specifically to permit the use of summary prospectuses for those products. The Committee intends to submit a comment letter generally supporting the Commission's approach and addressing many of the specific aspects of the Commission's proposals, and an extended comment period would provide the Committee members a better opportunity to give the proposals the careful and thorough consideration that they deserve.

The proposing release<sup>2</sup> states that comments on the proposals should be submitted on or before February 15, 2019. The Committee notes that by letter dated December 20, 2018, the American Council of Life Insurers (ACLI) requested an extended comment period of 45-60 days.

<sup>1</sup> The Committee is a coalition of many of the largest and most prominent issuers of annuity contracts. The Committee's 31 member companies represent more than 80% of the annuity business in the United States. The Committee was formed in 1981 to address legislative and regulatory issues relevant to the annuity industry and to participate in the development of insurance, securities, banking, and tax policies regarding annuities. For over three decades, the Committee has played a prominent role in shaping government and regulatory policies with respect to annuities at both the federal and state levels, working with and advocating before the SEC, CFTC, FINRA, IRS, Treasury Department, Department of Labor, as well as the NAIC and relevant Congressional committees. Additional information about the Committee, including its membership, is available on its website at <https://www.annuity-insurers.org>.

<sup>2</sup> **Updated Disclosure Requirements and Summary Prospectus for Variable Annuity and Variable Life Insurance Contracts**, Release No. 33-10569; IC-33286 (83 Fed. Reg. 61730, Nov. 30, 2018) (the "Proposing Release").

Members of the Committee are also members of the ACLI. The Committee supports the ACLI's request for a 45-60 day extension of the comment period.

Any questions regarding this request may be addressed to the undersigned at [REDACTED]

[REDACTED] Thank you for your consideration of this letter.

THE COMMITTEE OF ANNUITY INSURERS

By:   
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