

ACLI Survey on Accelerated Financial Reporting Deadlines

Reference: **Proposed Rule:**
**Acceleration of Periodic Report Filing Dates and Disclosure Concerning
Website Access to Reports**

Please respond by May 13, 2002

SEC Response Due May 23, 2002

Please answer for your company or fleet:

1. [Mutual](#)
2. Company or Fleet Name (*for ACLI use only*)
3. Mark the major lines of business in which your company or fleet participates (*please check all that apply*):
Group Life/Health Fixed Annuities Variable Annuities
Variable Life Universal Life Traditional Life
Long-Term Care
Other (FAS 60) insurance:
Market Value Annuity? [Yes](#) SEC-Filed? [Yes](#)
4. Statutory **general account assets** for company or fleet (as of 12/2001):
Rounded to millions: \$
5. Statutory **separate account assets** for company or fleet (as of 12/2001):
Rounded to millions: \$
6. Do the same accounting people work on both statutory and GAAP reports? [Yes](#)
Please explain if necessary:
7. Does the Chief Actuary for regulatory purposes also serve as the Chief Actuary for GAAP reporting? [Yes](#)
Please explain if necessary:
8. Does the controller or controller's function review and sign off on both statutory and GAAP reports? [Yes](#)

Please explain if necessary:

9. Does the CFO of the organization review both statutory and GAAP filings? **GAAP Only**

Please explain if necessary:

10. Does the Audit Committee of the Board review both statutory and GAAP filings? **GAAP Only**

Please explain if necessary:

For answering both sets of questions A and B below, consider utilizing your filing deadlines' (checklist/due dates) process and backing up, i.e. start with the proposed accelerated deadline. Consider your timeline process to close the books, prepare the statements, obtain reviews and year-end Audit Committee review and approval, etc. Slot in the dates or workdays of your current process to determine how your current process may be affected (does your company/fleet run out of time under the current process utilizing the accelerated dates? At what point in the process? What barriers can be removed or processes can be improved, and in what timeframe?).

- A1. Do you feel your organization currently could meet the 30-day accelerated deadline proposed for the quarter? **Yes**

If not, which of the following impede your ability to do so (please check all that apply)?

DAC Processes Valuation Processes Expense System
Investment System Statutory Concerns
Business Unit Review and Analyses Controller Review and Analyses

Other:

- A2. If you answered **No** to A1., do you feel you can eventually meet that deadline if enough time were available to study and change processes? **Yes**

- A3. If you answered **Yes** to A2., how much time would it take?

- A4. Any other comments?:

- B1. Do you feel your organization currently could meet the 60-day Accelerated deadline proposed for year-end reporting? **Yes**

If not, which of the following impede your ability to do so?

DAC Processes Valuation Processes Expense System
Investment System Statutory Concerns
Business Unit Review and Analyses Controller Review and Analyses

Other:

- B2. If you answered **No** to B1., do you feel you can eventually meet that deadline if enough time to study processes? **Yes**
- B3. If you answered **Yes** to B2., how much time would it take?
- B4. Any other comments:

- B5. Please select a number from 1-6 in column, “Order of Completion” next to each item below with 1 being the item or SEC report completed first. Please show whether or not it can be accelerated on its own (without accelerating the rest) by selecting Yes or No in column, “Accelerated on Own?”. If two types of reports can be or are completed at the same time, feel free to use the same number for those items:

<u>Item</u>	<u>Order of Completion</u>	<u>Accelerated on Own?</u>	<u>If so, How much?</u>
Operating Earnings/Press Release	1	Yes	
Financial Statements under GAAP	1	Yes	
MD&A	1	Yes	
Financial Statement Footnotes	1	Yes	
10K	1	Yes	
Proxy	1	Yes	

- B6. If it could be an alternative, how would your company react to filing one of the above reports prior to the others (i.e. on an accelerated basis)?
- B7. Does your company send an investor supplement with certain financial statement information prior to the SEC filing? **Yes**
Please explain if necessary:
- B8. What workday of the month does your company typically report GAAP earnings? (Workday is defined as M-F of the following month or months and excludes weekends. e.g., an April 17, 2002 press release would be the 13th workday.)
Please explain if necessary:

C1. The SEC proposal notes that technological advances over the last 30 years has served to improve financial statement reporting and analyses for companies. Therefore, acceleration of dates to report financial information should not be overly burdensome.

Please share your thoughts on the SEC's comment related to technological advances and how they have or have not improved your capability to accelerate deadlines. Please also comment on other changes in the industry, in your company, etc. over the last 30 years and/or any other barriers your company may have to the proposal to accelerate the filing deadlines. (In some companies, perhaps offsetting the technological advances is the more complicated entity structure due to mergers and acquisitions, as well as more complex accounting rules and complex product structures.)

C2. Please comment on how any required SEC Variable filings impact the close related processes on a quarterly or year-end basis.

Thank you for taking the time to complete this survey. The responses by company will be aggregated in order to represent and substantiate the industry's perspective in a response to the SEC regarding the proposed rules. Substantial minority positions will be reflected as well. The individual company/fleet responses will be held in strictest confidence by the ACLI, and that information is provided only to aid the ACLI in any follow up efforts.