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Commissioner of Insurance Nathan Houdek (WI)

Chair, Accelerated Underwriting (A) Working Group (AUWG)

Commissioner of Commerce Grace Arnold (MN)

Vice Chair, Accelerated Underwriting (A) Working Group (AUWG)

Re: ACLI Comments on the AUWG Draft Regulatory Guidance and Considerations

Dear Commissioners Houdek and Arnold,

Thank you for the opportunity to comment on the draft Regulatory Guidance and Considerations created by the Ad Hoc Drafting Subgroup. The American Council of Life Insurers (ACLI) remains very supportive of the important work conducted by the Accelerated Underwriting (A) Working Group. As regulators, industry and other stakeholders continue to discuss and work through the many issues associated with the use of Big Data, Artificial Intelligence (AI) and Machine Learning (ML) in accelerated underwriting,

American Council of Life Insurers | 101 Constitution Ave, NW, Suite 700 | Washington, DC 20001-2133

The American Council of Life Insurers (ACLI) is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. 90 million American families rely on the life insurance industry for financial protection and retirement gYW fjm 57@g a Ya VYf Wca dUb]g UFY XYXWUHXX hc dfchVWb[Wcbgi a Yfg ZbUbVU k Y VYb[hfci [\ life insurance, annuities, retirement plans, long-hfa WUFY Jbgi fUbWZ X]gUV]]m]bVca Y Jbgi fUbWZ fY]bgi fUbWZ UbX XYbUz] J]cb UbX chYf gi ddYa YbU VYbYZfg 57@g & \$ member companies represent 94 percent of industry assets in the United States.

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guidance also gHh'g'h.Uh dfYX]Wf] Y'a cXY'g'cf'a UWx]bY'YUfb]b['U[cf]h'a f]Ek]h.]b'

Sincerely
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David M. Lifer

S716 (rel)8(y)]TJETQ 0.00000912 0 612 792 reW*BT/F1 11.04 Tf1 0 0 1 114.62 730.8 Tm Sincerely