

company issue these Other Health products ~~through~~ to associations/trusts?" The term "through" associations is confusing. The association is the policyholder, and the insurance carrier is the insurer. In the same way that a carrier issues a policy to an employer group, it issues to an association or trust group.

Interrogatories #17-20

We suggest striking these interrogatories and replacing with the following: "Has the company filed the association by-laws and articles of incorporation in this jurisdiction if required?" It is our understanding that the information sought from these interrogatories is whether companies are filing association by-laws and articles of incorporation when required to do so. However, not all states require this. The current interrogatories do not give companies space to note that they did not file because it was not required. The suggested replacement will be simpler for regulators in their analysis. Additionally, regulators will be able to determine whether association by-laws and articles of incorporation were filed in each jurisdiction for which the company responds through this MCAS.

TPA Interrogatories

The term "third party administrators" is not defined and therefore it is not clear whether this includes producers which are licensed separately from a TPA and are often different entities. The different functions inquired abop7(rer)-2(.)-4()-4(l)5(n)4()-4(th)7(e)8)-4(sa)11(m)-3(e)8)-4(wa)11 0inte12 79Bw whether

