

December 16, 2021

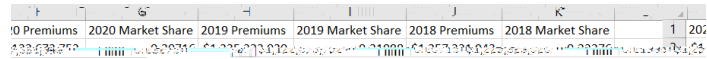
Dear Mr. Helder:

Thank you for the opportunity to provide comments on items discussed at the recent Market Analysis Prioritization (D) Working Group call on November 15, 2021, most notably the document detailing possible iSite+Reports for elimination. Massachusetts shares many of the concerns voiced by call participants regarding eliminating (at least at this point) the MAPT data and reports.

Reports Proposed for Elimination:

Our team regularly uses the MARS Reports and the Market Analysis Market Share Reports.

Market Analysis Market Share concerned that NAIC will abolish the financial market share by line of business reports leaving without a source for state-specific market share and loss ratio information.



	F	G	H	I	J	K	L
10	Premiums	2020 Market Share	2019 Premiums	2019 Market Share	2018 Premiums	2018 Market Share	1 202
11	1,338,478,252	0.26316	1,127,113,832	0.21600	1,027,376,042	0.2276	1,027,376,042

Analysts to monitor the status of Level I and Level II reviews, download complete reports as needed. The MARS reports also provide regular updating, and tracking reviews, in addition to allowing report download, and PDF. For example, we can print or copy and paste the data from the Excel spreadsheet or email in the example below as current MARS reports support these options.

We are concerned that NAIC may abolish the MARS and Market Analysis Market Share Reports without having a user-friendly alternative for the options listed above in place. In addition to conducting 70 or more analysis examinations in each data cycle, we routinely design and prepare custom reports for senior management. If we cannot access the data provided by the MARS and Market Analysis Share Reports, special projects and custom reports will be challenging, if not impossible, to accomplish in a cost and time-effective manner. Furthermore, our analysts must submit customized requests to the NAIC for the elimon

Example Image displaying a company on each row, which line of business, and details on why they were selected or not selected for a cycle.

Although the application allows the analyst to create a custom ratio, they cannot download the resulting data. For example, consider ratio 4 for individual variable annuities, which looks at the number of contracts surrendered under ten (2) years from issuance. Massachusetts prefers to focus on contracts surrendered under two (2) years from issuance or 2-5 years from issuance. In our analysis process, the underlying data on ratio 4 is essential to evaluating the potential for consumer harm. Despite having a customized option, we would be unable to download the pertinent data.

Consultants and contractors are sometimes employed to conduct baseline analysis and may not

Identifying Data Issues

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