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Jennifer Gardner Data Coordination and Statistical Analysis Manager National Association of Insurance Commissioners 1100 Walnut Street, Suite 1500

Governance

Metrics and targets

- 8. The second bullet addresses catastrophe models and references life & health, in addition to property & casualty. Catastrophe models should not be presumed to exist in the life & health space. We suggest eliminating life/health and/or adding "if any" at the end of the bullet.
- 9. The third and fourth bullets, relating to climate scenarios, appear to be related to process (i.e., risk management), not metrics and targets. We suggest that they be moved to the risk management section.
- 10. For the closed-end multiple-choice questions, in order to avoid unintended prescription, an "other" option should exist.

We appreciate the opportunity to comment and look forward to additional engagement as the project continues.

Sincerely,

William J. Schwegler Vice President – Financial Policy Transamerica Life Insurance Company 6400 C Street SW Cedar Rapids, IA 52499 (319) 355-2667