

The proposed changes to the model include a certification of compliance with the relevant nonforfeiture standards.

3. Section 3A(2) of the Standard Nonforfeiture Law for Individual Deferred Annuities contains this language: "The company may reserve the right to defer the payment of the cash surrender benefit for a period not to exceed six (6) months after demand therefor with surrender of the contract after making written request and receiving written approval of the commissioner. The request shall address the necessity and equitability to all policyholderl ooooooT-0.0iT61(oT)h.37(-)10.6 (o2T)(fo)-Tf.7 (h)5.3- ()JT(5.0.0i(f3)-Tf.)n fore 3ye(ag)The (ec)2(5)23(ec)1