



Financial Security...for Life.

Joann Waiters

Regional Vice President, State Relations

July 9, 2015

Jennifer M. Libster
Associate General Counsel
Health Benefit Exchange Authority
1225 Eye Street, NW
Suite 400
Washington, DC 20005

Dear Ms. Libster:

On behalf of the American Council of Life Insurers (ACLI), I want to thank you for the opportunity to comment on the District of Columbia Health Benefit Exchange Authority's Informal Discussion Draft Regulations relating to Chapter 1, titled "Health Carrier Assessment." ACLI is a Washington D.C.-based trade association with 282 member companies operating in the United States and abroad. Two hundred and thirty seven (237) of our members are licensed to do business in the District of Columbia. ACLI advocates in federal, state, and international forums for public policy that supports the industry marketplace and the 75 million American families that rely on life insurers' products for financial and retirement security. Our members offer life insurance, annuities, retirement plans, long-term care and disability income insurance, and reinsurance, representing more than 90 percent of industry assets and premiums.

As stated in the matter of *American Council of Life Insurers v. District of Columbia Health Benefit Exchange Authority et al.*, we continue to strongly object to any legislation and/or regulation that authorizes the Exchange to assess a fee on products such as disability income insurance, long-term care insurance and other supplemental products that are not sold on the DC Exchange. This objection is based on both federal statutory and constitutional grounds. ACLI respectfully urges the Exchange to reconsider its position of assessing these products.

Again, we thank you for the opportunity to comment on the proposed regulation and ask that you carefully consider our comments.

Sincerely,

A handwritten signature in black ink that reads "Joann Waiters". The signature is written in a cursive, flowing style.

Joann Waiters

American Council of Life Insurers

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