



AMERICAN ACADEMY of ACTUARIES

December 1, 2006

Tracie Lambright
Life and Health Product Review
Office of Insurance Regulation
200 East Gaines Street
Tallahassee, Florida

RE: American Academy of Actuaries'¹ Life Products Committee Comments on
Proposed Florida Rule on Unfair Discrimination Because of Travel Plans

Dear Ms. Lambright:

The Life Products Committee of the American Academy of Actuaries requests an opportunity to comment on the draft of the *Florida Rule on Unfair Discrimination Because of Travel Plans*, which is scheduled to be discussed at a rule development workshop on December 1, 2006. As you may know, the Academy Life Products Committee authored a paper entitled the *Academy Life Products Committee Position on the Use of Travel in Life Insurance Underwriting* which can be found on the Academy web page at: http://www.actuary.org/pdf/life/travel_sept06.pdf. Since we had no advance copy of the draft, we would prefer to wait until it is available, but we do look forward to the opportunity to give you our written comments at that time.

We also wanted to let you know that we will be commenting on the NAIC draft of the NAIC Unfair Trade Practices Act as it concerns travel underwriting, which was exposed for comment on November 27, 2006. Attached is a copy of our comments.

Please keep us on your mailing list as you continue to seek input on the proposed rule.

Academy of Actuaries Life Products Committee

Cande Olsen, F.S.A., M.A.A.A., Chairperson
John MacBain, F.S.A., M.A.A.A., Vice-Chairperson
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Paul Carmody, F.S.A., M.A.A.A.
Arnold A. Dicke, F.S.A., F.C.A., M.A.A.A.
David J. Hippen, F.S.A., M.A.A.A.

Kitty Kennedy, A.S.A., M.A.A.A.
Barbara Lautzenheiser, F.S.A., F.C.A., M.A.A.A.
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Linda Rodway, F.S.A., M.A.A.A.
Larry H. Rubin, F.S.A., M.A.A.A.
Andy Ware, F.S.A., M.A.A.A.
David J. Weinsier, F.S.A., M.A.A.A.

Cc: Dan Keating, Actuary, Florida Department of Financial Services

¹ The American Academy of Actuaries is a national organization formed in 1965 to bring together, in a single entity, actuaries of all specializations within the United States. A major purpose of the Academy is to act as a public information organization for the profession. Academy committees, task forces and work groups regularly prepare testimony and provide information to Congress and senior federal policy-makers, comment on proposed federal and state regulations, and work closely with the National Association of Insurance Commissioners and state officials on issues related to insurance, pensions and other forms of risk financing. The Academy establishes qualification standards for the actuarial profession in the United States and supports two independent boards. The Actuarial Standards Board promulgates standards of practice for the profession, and the Actuarial Board for Counseling and Discipline helps to ensure high standards of professional conduct are met. The Academy also supports the Joint Committee for the Code of Professional Conduct, which develops standards of conduct for the U.S. actuarial profession.