



July 16, 2026

Ben Slutsker
Chair, Life Risk-Based Capital (E) Working Group
National Association of Insurance Commissioners

Re: C3 Field Test Specifications—Revisions

Dear Chair Slutsker:

On behalf of the C3 Subcommittee (Subcommittee) of the American Academy of Actuaries,¹ we appreciate the opportunity to share the attached proposed revisions to the C3 Field Test Specifications. These revisions reflect the discussions of the NAIC C3 Alignment Drafting Group (the Drafting Group).

Our materials include a comparison document, and we note the following key changes:

- Removal of the initial cover questions
- Changed timing of Field Test (FT) to be until October
- Allow for 12/31 or 09/30 modeling valuation dates, per company practices
- Removed referenced to C3P2 methodology in section D and simply refer to CTE 90, as CTE 90 is the likely target, but FT will serve to provide data points for further calibration
- Added granularity specifications in section G
- Created a new set of attribution runs which were agreed upon with the Drafting Group, in Section H and in tabular form
- Reworded Appendix I to focus on equity modeling option 1 (previously provided two options) and called out both equity and equity-like assets for this modeling approach
- Adjusted the timeline, per the comment above, in Appendix II

We appreciate the ongoing collaboration with the Working Group on this issue and look forward to continuing discussions. If you have any questions or would like to discuss these revisions further, please contact Fabienne Amisial, the Academy's life policy project manager (amisial@actuary.org).

Sincerely,

Rick Hayes, MAAA, ASA, CERA
Chairperson, C3 Subcommittee

¹ The American Academy of Actuaries is a 20,000-member professional association whose mission is to serve the public and the U.S. actuarial profession. For 60 years, the Academy has assisted public policymakers on all levels by providing leadership, objective expertise, and actuarial advice on risk and financial security issues. The Academy also sets qualification, practice, and professionalism standards for actuaries in the United States.