



**INTERNATIONAL ASSOCIATION
OF INSURANCE RECEIVERS**
PROMOTING PROFESSIONALISM AND ETHICS

June 2, 2016

Jane M. Koenigsman, FLMI
Sr. Manager I – Life/Health Financial Analysis
National Association of Insurance Commissioners

RE: Request for Comments on the Revisions to Life and Health Insurance Guaranty
Association Model Act (#520)

On behalf of the International Association of Insurance Receivers (“IAIR”), this letter responds to your request for comments on the proposed revisions to Life and Health Insurance Guaranty Association Model Act (#520) regarding the exclusion of persons who have purchased from an original structured settlement annuity payee his or her rights to receive structured settlement annuity benefits from coverage.

As you are aware, IAIR was founded in 1991 as an association of professionals involved with insurance receiverships and financially stressed or troubled insurers. IAIR’s mission includes facilitating the exchange of information concerning the administration and restructuring of such insurers. IAIR’s members include experienced insurance receivers (including liquidators and rehabilitators), insurance regulators, life and health and property and casualty guaranty associations, and other professionals (attorneys, accountants, actuaries, information technology experts, etc.) that provide consulting services in rehabilitation and liquidation proceedings.

IAIR appreciates the opportunity to provide this response. After careful consideration, IAIR supports the suggested revisions and thanks the committee for its work on this matter. We thank you for the opportunity to opine on this matter.

Respectfully submitted,

Jonathan L. Bing, Esq.

International Association of Insurance Receivers, First Vice
President