

The COMMITTEE
— of —
ANNUITY
INSURERS

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November 20, 2023

FILED ELECTRONICALLY

Office of Regulations and Interpretations
Employee Benefits Security Administration
Docket ID: EBSA-2023-0014
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

Re: Request to Testify at Public Hearing on Proposed Amendments to the Definition of an Investment Advice Fiduciary and Related Prohibited Transaction Exemptions, Docket EBSA-2023-0014

On behalf of the Committee of Annuity Insurers (the “Committee”), we are writing to request to testify at the virtual public hearing that is scheduled for December 12-14 regarding the Department’s proposed amendments to the definition of an investment advice fiduciary and related prohibited transaction exemptions.

Individual who will be testifying:

Michael L. Hadley
Partner, Davis & Harman LLP
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Organization whose views will be represented:

Mr. Hadley will be testifying on behalf of the Committee of Annuity Insurers.

The Committee is a coalition of life insurance companies formed in 1981 to participate in the development of federal policy with respect to tax, securities, ERISA, and banking law issues affecting annuities. The Committee’s current 32 member companies represent approximately 80% of the annuity business in the United States and are among the largest issuers of annuity contracts to IRAs and employer-sponsored retirement plans. A list of the Committee’s member companies is attached.

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The Committee has not yet submitted written comments on the proposal, because the Department set the date of the public hearing before the due date for written comments. The Committee plans to submit written comments by the January 2, 2024, deadline that the Department has imposed.

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If you have any questions or require any additional information, please contact either of the undersigned at 202-347-2230.

Counsel to the Committee of Annuity Insurers



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Attachment (List of Committee Members)

The COMMITTEE
of
ANNUITY
INSURERS

Allianz Life Insurance Company, Minneapolis, MN
Ameriprise Financial, Minneapolis, MN
Athene USA, Des Moines, IA
AuguStar Life Insurance Company, Cincinnati, OH
Brighthouse Financial, Inc., Charlotte, NC
Corebridge Financial, Houston, TX
Equitable, New York, NY
Fidelity & Guaranty Life Insurance Company, Des Moines, Iowa
Fidelity Investments Life Insurance Company, Boston, MA
Fortitude Re, Jersey City, NJ
Genworth Financial, Richmond, VA
Global Atlantic Financial Group, Southborough, MA
Guardian Insurance & Annuity Co., Inc., New York, NY
Jackson National Life Insurance Company, Lansing, MI
John Hancock Life Insurance Company, Boston, MA
Lincoln Financial Group, Fort Wayne, IN
Massachusetts Mutual Life Insurance Company, Springfield, MA
Metropolitan Life Insurance Company, New York, NY
Nationwide Life Insurance Companies, Columbus, OH
New York Life Insurance Company, New York, NY
Northwestern Mutual Life Insurance Company, Milwaukee, WI
Pacific Life Insurance Company, Newport Beach, CA
Protective Life Insurance Company, Birmingham, AL
Prudential Insurance Company of America, Newark, NJ
Sammons Financial Group, Chicago, IL
Security Benefit Life Insurance Company, Topeka, KS
Symetra Financial, Bellevue, WA
Talcott Resolution, Windsor, CT
Thrivent, Minneapolis, MN
TIAA, New York, NY
TruStage, Madison, WI
USAA Life Insurance Company, San Antonio, TX

The Committee of Annuity Insurers was formed in 1981 to participate in the development of federal policies with respect to annuities. The member companies of the Committee represent approximately 80% of the annuity business in the United States.