



RED SHIELD
INSURANCE COMPANY®

Administration Offices: 206-762-4338

FAX: 206-763-1139

7245 W. Marginal Way, S.W.

P.O. Box 3736

Seattle, Washington 98124

RECEIVED

APR 11 2011

**INSURANCE COMMISSIONER
COMPANY SUPERVISION**

April 7, 2011

Mr. James T. Odiorne, CPA, JD
Deputy Insurance Commissioner
PO Box 40255
Olympia, WA 98504-0255

RE: NAIC Model Law 820 – Standard Valuation

Dear Mr. Odiorne,

Thank you for soliciting stakeholder input regarding Model Law # 820. As you know it primarily is applicable to Life & Annuity and Accident and Health business.

We have reviewed the model law and have no position on it as it appears to have no impact on Red Shield's business.

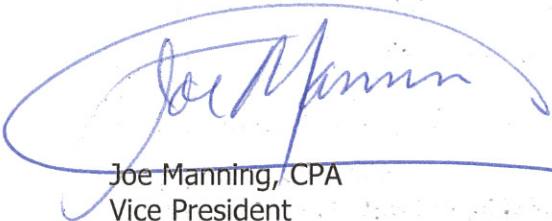
Regarding your specific questions; as a general point we prefer the vetting method , encouraging stakeholders input for meaningful comments and suggested changes, afforded in the rule making process the rather than automatic adoption model law changes.

As an observation, we found Section 12 Valuation Manual for Policies Issued On or After the Operation Date of the Valuation Manual to be well written and reasonable.

If you have any questions please let us know. You can reach me by calling 206.762.4338 or emailing jmanning@redshield.com

Sincerely

Red Shield Insurance Company


Joe Manning, CPA
Vice President