

**From:** [Dennis Burke](#)  
**To:** [OIC Rules Coordinator](#)  
**Cc:** [Dennis Burke](#)  
**Subject:** Notice of a first stakeholder draft posted for R 2021-05 Reinsurance agreements  
**Date:** Wednesday, July 14, 2021 10:08:39 AM

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Commissioner Kreidler,

As you know, I represent the Reinsurance Association of America and submit these comments on behalf of our members.

The RAA has no substantive amendments to the referenced draft regulation. We thank you and your staff for your efforts in maintaining as much of a uniform process as can be achieved in the state based insurance system. If there are substantive comments or proposed changes from others, we would like to be engaged in such discussions. Accordingly, please add me to your regulatory distribution list.

Also, the RAA is working with the NAIC staff, ReFAWG and others to help streamline the “50 state” implementation process. We understand the NAIC is working on a certified and reciprocal reinsurer passporting process document.

When the RAA’s comments to the NAIC on the passporting document are filed, they will include a suggestion that for consistency and expediency, we believe ReFAWG and the NAIC should draft sample document(s) that states could evaluate, use or adapt in developing their own websites and related processes for certified and reciprocal reinsurers.

We encourage you and your staff to participate in those documentary and process discussions.

Best regards,

Dennis

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