From:Kathryn KolanTo:OIC Rules CoordinatorCc:Bradstreet, Chara

Subject: COMMENT - Best interest standard for annuities (R 2023-05) proposed rule

Date: Monday, October 23, 2023 5:54:35 PM

External Email

Hello OIC Rules Coordinator -

As we understand the producer training requirements for producers who have already completed an annuity suitability training course prior to January 1, 2024, where such training did not include the new best interest standard, the model regulation provides that producers may complete either an additional one-hour (or credit) course or a new four-credit training course that includes the new best interest conduct training.

As proposed under WAC 284017-265(2)(b), only the 1-hour (credit) option is available. Even though producers in this position are more likely to opt for the shorter course, <u>can we amend this section to allow for either the additional 1-credit training course or the new 4-credit best interest standard training course?</u>

Sincerely,

Katie

Kathryn Kolan, JD Leonard & Kolan Mobile (206) 618-4821