



STATE OF TENNESSEE
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January 11, 2017

Via Email

Cody Ryan York
Attn: Ashley Hickman
Publications Division
312 Rosa L. Parks Avenue
8th Floor, William Snodgrass Tower
Nashville, Tennessee 37243

Re: Title Change in Tenn. Comp. R. & Regs. 0780-01-94-.05

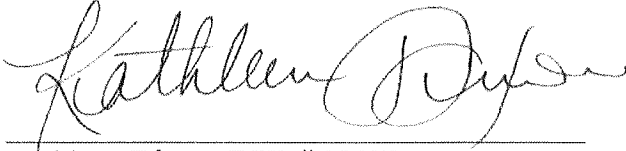
Dear Mr. York:

My name is Kathleen Dixon, and I am the Assistant General Counsel and Supervising Attorney for the Insurance and TennCare Oversight Divisions of the Department of Commerce and Insurance. The Insurance Division ("Division") recently ran rules entitled Use of Senior Specific Designation in Life Insurance and Annuities, Tenn. Comp. R. & Regs. 0780-01-94. The chapter as is effective today is a National Association of Insurance Commissioners ("NAIC") model regulation.

When the Division originally started drafting these rules, the rule language deviated from the NAIC model regulation language. However, as the Division prepared to file these rules for rulemaking hearing, it ultimately decided to defer entirely to the NAIC model regulation language. Unfortunately, as a result of the evolution of this rule prior to filing with the Secretary of State's Office, the title in the body of rule 0780-01-94-.05 was not changed to reflect the model regulation. The chapter's table of contents does reflect the model regulation title for that rule, but not the title of the rule in the body of the chapter. This was an inadvertent oversight, and the Division would request that the title of rule 0780-01-94-.05 be changed to reflect that which is stated in the table of contents which reads as follows: "Prohibited Uses of Senior Specific Certifications and Professional Designations."

Thank you for your time and consideration. If you have questions, please contact me at the above telephone number.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kathleen Dixon", written in black ink.

Kathleen Dixon, BPR # 32072
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for Insurance and TennCare Oversight
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