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30 June 2016

Richard T. Cassidy, President  
Rex Blackburn, Co-Chair, RUUPA Drafting Committee  
Michael Houghton, Co-Chair, RUUPA Drafting Committee  
Charles A. Trost, Reporter & Draftsman, RUUPA Drafting Committee  
Uniform Law Commission  
Via [katie.robinson@uniformlaws.org](mailto:katie.robinson@uniformlaws.org)

Re: *Revised Uniform Unclaimed Property Act*

Dear President Cassidy & Messrs. Blackburn, Houghton, & Trost:

The American Council of Life Insurers takes a moment to appreciate the efforts of the members and leadership of the Drafting Committee charged to accomplish the *Revised Uniform Unclaimed Property Act* (RUUPA). Few uniform law models present as challenging an array of interests, philosophies and concerns as the one addressing unclaimed property. The members of and reporter for the Drafting Committee listened patiently to understand the concerns of every interested party, and then worked tirelessly to balance the competing interests to obtain respectable results. A successful example of this process are the provisions determining when a life insurance company has knowledge of death, which enables companies and unclaimed property administrators to use on a common basis the federal death master file pursuant to law or other standards in a manner which should lead to uniform national practices. Assuming that there are no amendments or changes to the language of the proposed revisions affecting life insurance which were concluded in our recent discussions, the ACLI will not raise objection to the life insurance provisions of the RUUPA at the Uniform Law Commission meeting.

Most every interested party will have recommendations for the improvement of the RUUPA. Many of the warm discussions entertained by the Drafting Committee will be rehearsed anew before state legislatures which consider adoption of the revised model. None of these discussions will challenge credibly the ways and means by which the Drafting Committee accomplished its work. The ACLI thanks Chairmen Michael Houghton & Rex Blackburn, Reporter Charles Trost, and, in their service as members of the life insurance subcommittee, Commissioners Howard Swibel and Raymond Pepe, for keeping open minds and open communications for all to advance suggestions for improvements to the drafts and resolution of disputes. It was an honorable mission gallantly undertaken by these gentlemen and their colleagues on the drafting committee, and the representatives of the American Council of Life Insurers are glad to have participated in the process duly provided to all.

Sincerely,

