



April 11, 2022

Sent via Electronic Mail to rule-comments@sec.gov

Vanessa A. Countryman
Secretary
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-1090

Re: File Number S7-09-20

Dear Ms. Countryman:

On behalf of the Insured Retirement Institute (IRI)¹, we thank you for the opportunity to comment on the Securities and Exchange Commission's (SEC) proposed rule on ***Cybersecurity Risk Management for Investment Advisers, Registered Investment Companies, and Business Development Companies***, RIN 3235-AN08 (Proposed Rule)².

IRI has reviewed American Council of Life Insurers' (ACLI) comments, as will be submitted to the SEC by April 11, 2022. With ACLI's permission, IRI shared ACLI's comments on the Proposed Rule with our members.

Following consideration by and discussion with our members, IRI strongly supports ACLI's comments and endorses ACLI's recommendations regarding the Proposed Rule, most specifically as they relate to (i) alignment and consistency with existing frameworks; (ii) certain definitions; (iii) notification requirements; and (iv) responses to specific questions, as set forth in Appendix A of ACLI's Comments.

Further, IRI has received and reviewed the comments on the Proposed Rule by the Committee of Annuity Insurers (CAI), also to be submitted by April 11, 2022. With CAI's permission, IRI shared CAI's comments on the Proposed Rule with our members.

Following consideration by and discussion with our members, IRI strongly supports CAI's general comments and requests for clarification contained in CAI's letter, with specific regard to CAI's comments

¹ IRI is the leading association for the entire supply chain of insured retirement strategies, including life insurers, asset managers, and distributors such as broker-dealers, banks, and marketing organizations. IRI members account for more than 95 percent of annuity assets in the U.S., the top 10 distributors of annuities ranked by assets under management and are represented by financial professionals serving millions of Americans. IRI champions retirement security for all through leadership in advocacy, awareness, research, and the advancement of digital solutions within a collaborative industry community.

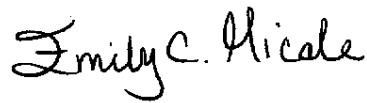
² 87 FR 13524

on how the Proposed Rule relates to variable annuity separate accounts organized as “unit investment trusts” (UITs).

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Thank you again for the opportunity to provide these comments. If you have questions about our support of CAI’s comments, as related to the Proposed Rule, or if we can be of any further assistance in connection with this important regulatory effort, please feel free to contact the undersigned at [REDACTED] or [REDACTED].

Sincerely,



Emily C. Micale
Director, Federal Regulatory Affairs
Insured Retirement Institute



John B. Jennings
Assistant Director, Government Affairs
Insured Retirement Institute