

## **Comments on Revised Non-Income Taxpayer Project Model Language**

This correspondence is submitted on behalf of the American Council of Life Insurers, the American Insurance Association and the Property Casualty Insurers Association of America, with the recent addition of America's Health Insurance Plans ("the Trades"). It specifically deals with the latest revised model language related to the Non-Income Taxpayer Project that will be the subject of discussion by the Uniformity Committee on February 5th.

The revisions to the model language do not alter the Trades' thinking or strong opinions about this project as articulated in prior submissions. The Trades continue to believe that if there are any issues of "tax equity" here, as the MTC asserts, they relate to the substantially greater state tax burden imposed on the insurance industry by the current insurance tax system and new tax inequities that the model would create. With the issue of "tax equity" at this project's core, the Trades believe the project inappropriately ventures into the policy arena and as such should simply be terminated. Such matters are instead the purview of state legislatures and policy-makers.