Thank you for the opportunity to provide comments on  APF 2025-02.  Maryland is in favor of keeping the current rounding down methodology and sees no compelling reason to change it to either round up or the more complicated rounding that would vary by the relative level of the 12 vs 36 month interest rate.  This should produce the highest cash value for consumers.

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| [A logo for a insurance administration  AI-generated content may be incorrect.](https://insurance.maryland.gov/) | **Nour Benchaaboun** (him/his/he) *Director - Life, Annuity & Credit Reviews* Life and Health Division Maryland Insurance Administration 200 St. Paul Place, Suite 2700 Baltimore, Maryland 21202 [insurance.maryland.gov](http://insurance.maryland.gov/) [nour.benchaaboun@maryland.gov](mailto:nour.benchaaboun@maryland.gov) [(410) 468-2222](tel:+14104682222) (Office)  [A blue square with a white letter f  AI-generated content may be incorrect.](https://www.facebook.com/MDInsuranceAdmin) [A white x on a black background  AI-generated content may be incorrect.](https://twitter.com/MD_Insurance) [A red and white play button  AI-generated content may be incorrect.](https://www.youtube.com/playlist?list=PLlgoHh4Po1J0TEXelqO_liLAokln_JTXV) [A logo of a camera  AI-generated content may be incorrect.](https://www.instagram.com/marylandinsuranceadmin/) [A blue square with white letters  AI-generated content may be incorrect.](https://www.linkedin.com/company/maryland-insurance-administration/) |