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I manage the consulting area of a company named Resource Insurance Consultants. We act as risk managers for bank trust departments involved with trust owned life insurance and annuities. As part of our risk management endeavors for our clients, we produce a policy value report for both life insurance and annuity products, including variable life and annuities. I read the recent article within the National Underwriter announcing FINRA proposed illustration changes for VL and VA. I would suggest that another step be added and that is a third party review of policy value 'before' a replacement of a variable life insurance or variable annuity could take place. This would protect the consumer from accepting a new policy that really isn't a better 'value' than the one being replaced.