September 20, 2019

Technical Director, File Reference No. 2019-760
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Re: Proposed Accounting Standards Update—Financial Services—Insurance (Topic 944): Effective Date

Athene Holding Limited (“Athene” or “we”) appreciates the opportunity to express our views on the Financial Accounting Standards Board’s (“FASB”) exposure draft regarding changes to the effective date of Accounting Standards Update 2018-12 (“LDTI”). Athene, through its subsidiaries, is a leading retirement services company that issues, reinsures and acquires retirement savings products designed for the increasing number of individuals and institutions seeking to fund retirement needs. The products offered by Athene include retail fixed, fixed-indexed and index-linked annuity products; reinsurance arrangements with third-party annuity providers; and institutional products, such as funding agreements and group annuity contracts related to pension risk transfers. As of June 30, 2019, Athene had consolidated total assets of $139.0 billion.

We thank the FASB for its outreach efforts to visit with stakeholders in order to understand the breadth and depth of operational implementation considerations associated with meeting the original effective date. We strongly support the proposal to defer the effective date for larger public companies to fiscal years, and interim periods within those fiscal years, beginning after December 15, 2021. The deferral of the effective date will allow us to better manage risk associated with the implementation of LDTI by allowing time for additional development and testing of new processes and controls. It will also allow us to implement the guidance in a more thoughtful and technologically efficient manner that better serves our business, management and users of our financial statements.

While we strongly support the proposed change to the effective date of LDTI, we continue to have concerns regarding transition for reinsurance contracts between larger public companies and all others due to the significant data interdependencies between reinsurance counterparties with different effective dates. We believe the FASB needs to address this issue as soon as possible and request that the FASB consider the following recommended practical expedient.
For blocks of business reinsured between large public companies and all others where the administration and/or valuation of the business has been transferred to (or retained by) the smaller reporting company (“SRC”) or non-public entity, the effective date of the guidance would be fiscal years beginning after December 15, 2023, and interim periods within fiscal years beginning after December 15, 2024, determined on a contract-by-contract basis and allowing for early adoption.

We appreciate your consideration of our comments. If you have any questions or would like to discuss further, please contact me at (515) 342-4642 or jsondej@athene.com.

Sincerely,

John A. Sondej
Senior Vice President and Controller
(Principal Accounting Officer)