

Life Insurance and Modified Endowments Under Internal Revenue Code Sections 7702 and 7702A

Christian J. DesRochers



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This innovative work provides a practical look at the issues surrounding federal income tax treatment of life insurance contracts, including in-depth information on the statutory definition of life insurance found in section 7702 and the modified endowment rules in 7702A. An essential resource for product designers and those dealing with compliance issues on a daily basis, the book also delivers background and historical information to help readers appreciate the context in which these sections were developed. Formulas and calculations are provided, along with extensive legal analysis and citations. Authors Chris DesRochers, a senior vice president of Aon Insurance Consulting Services (ICS), John T. Adney, partner in the law firm of Davis & Harman LLP, practicing primarily in the areas of taxation and insurance law and Doug Hertz and Brian King, both vice presidents and consulting actuaries with Aon ICS, team up to write a well-balanced book combining their extensive knowledge. The result is a text that reflects the actuarial theory, tax policy and political compromises underlying the statutory limitations.

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