

January 12, 2023

Mr. Philip Barlow Chair, Life Risk-Based Capital (E) Working Group (LRBCWG) National Association of Insurance Commissioners (NAIC) Via email: Dave Fleming (dfleming@naic.org)

Re: Proposal for Life C-2 Structural and Instruction Updates and a New Financial Statement Note

Dear Philip,

On behalf of the C-2 Mortality Work Group of the American Academy of Actuaries¹, we are providing the following proposed Life C-2 updates for consideration for 2023 year-end financial statements.

- 1. Structural updates where it pertains to the treatment of group permanent life and miscellaneous other instruction updates. The proposal assigns the same factors to group permanent life as individual permanent life for categories stating with and without pricing flexibility.
- 2. A new financial statement note to provide the development of net amounts at risk for the Life C-2 categories to create a direct link to a financial statement source, and accompanying Life C-2 structural and instruction updates. The proposed second update includes the updates specified in the first update.

If you have any questions on the above topics, please contact Amanda Barry-Moilanen, life policy analyst, at barrymoilanen@actuary.org.

Sincerely,

Chris Trost, MAAA, FSA Chairperson, C-2 Mortality Work Group

Ryan Fleming, MAAA, FSA Vice Chairperson, C-2 Mortality Work Group

American Academy of Actuaries

¹ The American Academy of Actuaries is a 19,500-member professional association whose mission is to serve the public and the U.S. actuarial profession. For more than 50 years, the Academy has assisted public policymakers on all levels by providing leadership, objective expertise, and actuarial advice on risk and financial security issues. The Academy also sets qualification, practice, and professionalism standards for actuaries in the United States.

Capital Adequacy (E) Task Force

RBC Proposal Form

[] Capital Adequacy (E) [] Catastrophe Risk (E) S [] C3 Phase II/ AG43 (E)	Subgroup [] Investment RBC (E) Work	ing Group [] Longevity Risk (A/E) Subgroup
	DATE: 1/12/23	FOR NAIC USE ONLY
CONTACT PERSON:	Ryan Fleming, MAAA, FSA	Agenda Item #
TELEPHONE:	(414) 665-5020	Year <u>2023</u>
EMAIL ADDRESS:	ryanfleming@northwesternmutual.com	<u>DISPOSITION</u>
ON BEHALF OF:	AAA C-2 Mortality Work Group	[] ADOPTED
NAME:	Ryan Fleming, MAAA, FSA	[] REJECTED
TITLE:	Vice Chairperson	[] DEFERRED TO
AFFILIATION:	American Academy of Actuaries	[] REFERRED TO OTHER NAIC GROUP
ADDRESS:	1850 M Street NW, Suite 300	[] EXPOSED
_	Washington, DC 20036	OTHER (SPECIFY)
Update 1: proposed updated b	DESCRIPTION OF CHANG	and LR031 and instruction updates.
Update 2: proposed new finar updates included in the first u	ncial statement note and accompanying LR025 structur pdate.	al and instruction updates. Update 2 includes the
	REASON OR JUSTIFICATION FOR	CHANGE **
Update 1: Structural changes are included to add clarity.	and instruction updates to address the treatment of ground	up permanent life policies. Other instruction updates
Update 2: The new financial state a direct link to a financial state	•	he categories needed for the Life C-2 schedule to create
	Additional Staff Commen	ts:

Revised 2-2019

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** This section must be completed on all forms.

LIFE INSURANCE

			(1)		(2) RBC
		Annual Statement Source	Statement Value	Factor	Requirement
	Individual & Industrial Life Net Amount at Risk				
(1)	Ordinary Life In Force	Exhibit of Life Insurance Column 4 Line 23 x 1000			
(2)	Plus Industrial Life In Force	Exhibit of Life Insurance Column 2 Line 23 x 1000			
(3)	Total Individual & Industrial Life In Force	Lines $(1) + (2)$			
(4)	Ordinary Life Reserves	Exhibit 5 Column 4 Line 0199999			
(5)	Plus Industrial Life Reserves	Exhibit 5 Column 3 Line 0199999			
(6)	Plus Ordinary Life Separate Accounts	Separate Accounts Exhibit 3 Column 3 Line 0199999			
(7)	Plus Ordinary & Industrial Life Modified Coinsurance Assumed Reserves	Schedule S Part 1 Section 1 Column 12, in part ‡			
(8)	Less Ordinary & Industrial Life Modified Coinsurance Ceded Reserves	Schedule S Part 3 Section 1 Column 14, in part ‡			
(9)	Total Individual & Industrial Life Reserves	Lines $(4) + (5) + (6) + (7) - (8)$			
(10)	Total Individual & Industrial Life Net Amount at Risk	Lines (3) - (9)			
(11)	Individual & Industrial Life Policies with Pricing Flexibility In Force	Company Records *			
(12)	Less Individual & Industrial Life Policies with Pricing Flexibility in Force Reserves	Company Records *			
(13)	Total Individual & Industrial Life Policies with Pricing Flexibility Net Amount at Risk	Lines (11) - (12)	X	† =	<u> </u>
(14)	Individual & Industrial Term Life Policies without Pricing Flexibility In Force	Company Records *			
(15)	Less Individual & Industrial Term Life Policies without Pricing Flexibility Reserves	Company Records *			
(16)	Total Individual & Industrial Term Life Policies without Pricing Flexibility Net Amount at Risk	Lines (14) - (15)	X	† =	
(17)	Individual & Industrial Permanent Life Policies without Pricing Flexibility In Force	Lines (3) - (11) - (14)			
(18)	Less Individual & Industrial Permanent Life Policies without Pricing Flexibility Reserves	Lines (9) - (12) - (15)			
(19)	Total Individual & Industrial Permanent Life Policies without Pricing Flexibility Net Amount at Risk	Lines (17) - (18)	X	† =	·
(20)	Total Individual & Industrial Life	Lines $(13) + (16) + (19)$			
	Group & Credit Life Net Amount at Risk				
(21)	Group Life In Force	Exhibit of Life Insurance Column 9 Line 23 x 1000			
(22)	Plus Credit Life In Force	Exhibit of Life Insurance Column 6 Line 23 x 1000			
(23)	Less Group FEGLI In Force	Exhibit of Life Insurance Column 4 Line 43 x 1000			
(24)	Less Group SGLI In Force	Exhibit of Life Insurance Column 4 Line 44 x 1000			
(25)	Less Credit FEGLI In Force	Exhibit of Life Insurance Column 2 Line 43 x 1000			
(26)	Less Credit SGLI In Force	Exhibit of Life Insurance Column 2 Line 44 x 1000			
(27)	Total Group & Credit Life In Force Excluding FEGLI/SGLI	Lines (21) + (22) - (23) - (24) - (25) - (26)			
(28)	Group Life Reserves	Exhibit 5 Column 6 Line 0199999			
(29)	Plus Credit Life Reserves	Exhibit 5 Column 5 Line 0199999			
(30)	Plus Group Life Separate Accounts	Separate Accounts Exhibit 3 Column 4 Line 0199999			
(31)	Plus Group & Credit Life Modified Coinsurance Assumed Reserves	Schedule S Part 1 Section 1 Column 12, in part ‡			
(32)	Less Group & Credit Life Modified Coinsurance Ceded Reserves	Schedule S Part 3 Section 1 Column 14, in part ‡			
(33)	Total Group & Credit Life Reserves	Lines (28) + (29) + (30) + (31) - (32)			
(34)	Total Group & Credit Life Net Amount at Risk Excluding FEGLI/SGLI	Lines (27) - (33)			
(35)	Group & Credit Term Life In Force with Remaining Rate Terms 36 Months and Under	Company Records *			
(36)	Less Group & Credit Term Life Reserves with Remaining Rate Terms 36 Months and Under	Company Records *			
(37)	Group & Credit Term Life Net Amount at Risk with Remaining Rate Terms 36 Months and Under	Lines (35) - (36)	X	† =	·
(38)	Group & Credit Term Life In Force with Remaining Rate Terms Over 36 Months	Lines (27) - (35) Company Records *			
(39)	Less Group & Credit Term Life Reserves with Remaining Rate Terms Over 36 Months Group & Credit Life Term Life Net Amount at Risk with Remaining Rate Terms Over 36 Months	Lines (33) - (36) Company Records *			
(40)	Group & Credit Life Ferm Life Net Amount at Risk with Remaining Rate Ferms Over 50 Months	Lines (38) - (39)	x	γ =	
(41)	Group & Credit Permanent Life Policies with Pricing Flexibility In Force	Company Records *			
(42)	Less Group & Credit Permanent Life Policies with Pricing Flexibility Reserves	Company Records *			
(43)	Group & Credit Permanent Life Policies with Pricing Flexibility Net Amount at Risk	Lines (41) - (42)	X	† =	·
(44)	Group & Credit Permanent Life Policies without Pricing Flexibility In Force	Lines (27) - (35) - (38) - (41)			
(45)	Less Group & Credit Permanent Life Policies without Pricing Flexibility Reserves	Lines (33) - (36) - (39) - (42)			
(46)	Group & Credit Permanent Life Policies without Pricing Flexibility Net Amount at Risk	Lines (44) - (45)	X	т =	
(41) (47)	FEGLI/SGLI Life In Force	Exhibit of Life Insurance Sum of Column 2 and 4 Line 43 and 44 x 1000	X	0.0004 =	=
(42) (48)	Total Group & Credit Life	Lines $(37) + (40) + (41) + (43) + (46) + (47)$			
(43) (49)	Total Life	Lines (20) + (42) + (48)			
(-)()		(·/ · (·=/ · (·=/			

- The definitions are specified in the Life Insurance section of the risk-based capital instructions
- The tiered calculation is illustrated in the Life Insurance section of the risk-based capital instructions.
- Include only the portion which relates to policy reserves that, if written on a direct basis, would be included on Exhibit 5.

(1)

(2)

Proposed 2023 Update 1 PREMIUM STABILIZATION RESERVES

			(1)		(2) RBC
		Annual Statement Source	Statement Value	<u>Factor</u>	Requirement
	Group and Credit Life and Health Reported Premium Stabilization R	<u>Leserves</u>			
(1)	Stabilization Reserves and Experience Rating Refunds included in Line 3	Page 3 Column 1 Line 3 in part		X	
(2)	Provision for Experience Rating Refunds	Page 3 Column 1 Line 9.2 in part		X	
(3)	Reserve for Group Rate Credits	Company Records		X	
(4)	Reserve for Credit Rate Credits	Company Records		X	
(5)	Premium Stabilization Reserves	Page 3 Column 1 Line 25 in part		X	
(6)	Total of Preliminary Premium Stabilization Reserve Credit	Sum of Lines (1) through (5)			
	Group & Credit Life and Health Risk-Based Capital				
(7)	Life	LR025 Life Insurance Column (2) Line (42) (48)			
(8)	Health	LR024 Health Claim Reserves Column (4) Line (16)			
		+ [LR024 Column (4) Line (15) x 0.65] + LR019			
		Health Premiums Column (2) Lines (12), (17), (18)			
		and (19) + [[LR019 Column (2) Lines (23), (24),			
		and (27)] x 0.65] + [LR020 Underwriting Risk -			
		Experience Fluctuation Risk Column (5) Line (18) -			
(0)	W. C. Pill P. Louis	Column (4) Line (18) x Line (1.2) / Line (1.3)]			
(9)	Maximum Risk-Based Capital	Lines (7) + (8)			
(10)	Final Premium Stabilization Reserve	Column (2) Line (6), but not more than Column (1) Line (9)		X	

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(2)

(1)

Proposed 2023 Update 1 CALCULATION OF TAX EFFECT FOR LIFE AND FRATERNAL RISK-BASED CAPITAL

		Source	RBC Amount	Tax Factor	RBC Tax Effect
	ASSET RISKS				
	Bonds				
(001)	Long-term Bonds - NAIC 1	LR002 Bonds Column (2) Line (2.8) + LR018 Off-Balance Sheet Collateral	X	0.1680	=
		Column (3) Line (2.8)			'
(002)	Long-term Bonds - NAIC 2	LR002 Bonds Column (2) Line (3.4) + LR018 Off-Balance Sheet Collateral	X	0.1680	=
		Column (3) Line (3.4)			
(003)	Long-term Bonds - NAIC 3	LR002 Bonds Column (2) Line (4.4) + LR018 Off-Balance Sheet Collateral	X	0.1680	=
		Column (3) Line (4.4)			
(004)	Long-term Bonds - NAIC 4	LR002 Bonds Column (2) Line (5.4) + LR018 Off-Balance Sheet Collateral	X	0.1680	=
		Column (3) Line (5.4)			'
(005)	Long-term Bonds – NAIC 5	LR002 Bonds Column (2) Line (6.4) + LR018 Off-Balance Sheet Collateral	X	0.1680	=
		Column (3) Line (6.4)			'
(006)	Long-term Bonds – NAIC 6	LR002 Bonds Column (2) Line (7) + LR018 Off-Balance Sheet Collateral	X	0.2100	=
		Column (3) Line (7)			
(007)	Short-term Bonds - NAIC 1	LR002 Bonds Column (2) Line (10.8)	X	0.1680	=
(008)	Short-term Bonds – NAIC 2	LR002 Bonds Column (2) Line (11.4)	X	0.1680	=
(009)	Short-term Bonds – NAIC 3	LR002 Bonds Column (2) Line (12.4)	X	0.1680	=
(010)	Short-term Bonds – NAIC 4	LR002 Bonds Column (2) Line (13.4)	X	0.1680	=
(011)	Short-term Bonds – NAIC 5	LR002 Bonds Column (2) Line (14.4)	X	0.1680	=
(012)	Short-term Bonds – NAIC 6	LR002 Bonds Column (2) Line (15)	X	0.2100	=
(013)	Credit for Hedging - NAIC 1 Through 5 Bonds	LR014 Hedged Asset Bond Schedule Column (13) Line (0199999)	X	0.1680	= †
(014)	Credit for Hedging - NAIC 6 Bonds	LR014 Hedged Asset Bond Schedule Column (13) Line (0299999)	X	0.2100	= †
(015)	Bond Reduction - Reinsurance	LR002 Bonds Column (2) Line (19)	X	0.2100	= †
(016)	Bond Increase - Reinsurance	LR002 Bonds Column (2) Line (20)	X	0.2100	=
(017)	Non-Exempt NAIC 1 U.S. Government Agency	LR002 Bonds Column (2) Line (22)	X	0.1680	=
(018)	Bonds Size Factor	LR002 Bonds Column (2) Line (26) - LR002 Bonds Column (2) Line (21)	X	0.1680	=
	<u>Mortgages</u>				
	In Good Standing				
(019)	Residential Mortgages - Insured	LR004 Mortgages Column (6) Line (1)	Y	0.1575	=
(020)	Residential Mortgages - Other	LR004 Mortgages Column (6) Line (2)	X	0.1575	=
(021)	Commercial Mortgages - Insured	LR004 Mortgages Column (6) Line (3)	X	0.1575	=
(022)	Total Commercial Mortgages - All Other	LR004 Mortgages Column (6) Line (9)	X	0.1575	=
(023)	Total Farm Mortgages	LR004 Mortgages Column (6) Line (15)	X	0.1575	=
()	90 Days Overdue				
(024)	Farm Mortgages	LR004 Mortgages Column (6) Line (16)	X	0.1575	=
(025)	Residential Mortgages - Insured	LR004 Mortgages Column (6) Line (17)	X	0.1575	=
(026)	Residential Mortgages - Other	LR004 Mortgages Column (6) Line (18)	X	0.1575	=
(027)	Commercial Mortgages - Insured	LR004 Mortgages Column (6) Line (19)	X	0.1575	=
(028)	Commercial Mortgages - Other	LR004 Mortgages Column (6) Line (20)	X	0.1575	=
	In Process of Foreclosure				_
(029)	Farm Mortgages	LR004 Mortgages Column (6) Line (21)	X	0.1575	=

Denotes lines that are deducted from the total rather than added.

Denotes items that must be manually entered on the filing software.

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NAIC Company Code

(2) RBC Tax Effect

			_	(1)		
(020)	D 11 (11M)	I D 0 0 4 14 () I () I () () () ()	Source	RBC Amount		Tax Factor
(030)	Residential Mortgages - Insured	LR004 Mortgages Column (6) Line (22)	:		X	0.1575
(031)	Residential Mortgages - Other	LR004 Mortgages Column (6) Line (23)			X	0.1575
(032)	Commercial Mortgages - Insured	LR004 Mortgages Column (6) Line (24)	:		X	0.1575
(033)	Commercial Mortgages - Other	LR004 Mortgages Column (6) Line (25)			X	0.1575
(034)	Due & Unpaid Taxes Mortgages	LR004 Mortgages Column (6) Line (26)			X	0.1575
(035)	Due & Unpaid Taxes - Foreclosures	LR004 Mortgages Column (6) Line (27)			X	0.1575
(036)	Mortgage Reduction - Reinsurance	LR004 Mortgages Column (6) Line (29)			X	0.2100
(037)	Mortgage Increase - Reinsurance	LR004 Mortgages Column (6) Line (30)			X	0.2100
	Preferred Stock					
(038)	Unaffiliated Preferred Stock NAIC 1	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (1)			X	0.1575
		+ LR018 Off-Balance Sheet Collateral Column (3) Line (9)				
(039)	Unaffiliated Preferred Stock NAIC 2	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (2)			X	0.1575
		+ LR018 Off-Balance Sheet Collateral Column (3) Line (10)				
(040)	Unaffiliated Preferred Stock-NAIC 3	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (3)	·		X	0.1575
		+ LR018 Off-Balance Sheet Collateral Column (3) Line (11)				
(041)	Unaffiliated Preferred Stock NAIC 4	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (4)			X	0.1575
		+ LR018 Off-Balance Sheet Collateral Column (3) Line (12)				
(042)	Unaffiliated Preferred Stock NAIC 5	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (5)			X	0.1575
		+ LR018 Off-Balance Sheet Collateral Column (3) Line (13)		-		
(043)	Unaffiliated Preferred Stock NAIC 6	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (6)			X	0.2100
		+ LR018 Off-Balance Sheet Collateral Column (3) Line (14)		-		
(044)	Preferred Stock Reduction-Reinsurance	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (8)			X	0.2100
(045)	Preferred Stock Increase-Reinsurance	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (9)	•		X	0.2100
	Separate Accounts		•			
(046)	Guaranteed Index	LR006 Separate Accounts Column (3) Line (1)			X	0.1575
(047)	Nonindex-Book Reserve	LR006 Separate Accounts Column (3) Line (2)	•		X	0.1575
(048)	Separate Accounts Nonindex-Market Reserve	LR006 Separate Accounts Column (3) Line (3)	•		X	0.1575
(049)	Separate Accounts Reduction-Reinsurance	LR006 Separate Accounts Column (3) Line (5)	•		X	0.2100
(050)	Separate Accounts Increase-Reinsurance	LR006 Separate Accounts Column (3) Line (6)	•	_	X	0.2100
(051)	Synthetic GICs	LR006 Separate Accounts Column (3) Line (8)	•		X	0.1575
(052)	Separate Account Surplus	LR006 Separate Accounts Column (3) Line (13)	•		X	0.1575
	Real Estate	* * * * * * * * * * * * * * * * * * * *	•	_		
(053)	Company Occupied Real Estate	LR007 Real Estate Column (3) Line (3)			X	0.2100
(054)	Foreclosed Real Estate	LR007 Real Estate Column (3) Line (6)	•		X	0.2100
(055)	Investment Real Estate	LR007 Real Estate Column (3) Line (9)	•	-	X	0.2100
(056)	Real Estate Reduction - Reinsurance	LR007 Real Estate Column (3) Line (11)	•		X	0.2100
(057)	Real Estate Increase - Reinsurance	LR007 Real Estate Column (3) Line (12)	•		X	0.2100
()	Schedule BA	(, (,	•	-		
(058)	Sch BA Real Estate Excluding Low Income	LR007 Real Estate Column (3) Line (16)			X	0.2100
()	Housing Tax Credits	(*) ()	•		-	
(059)	Guaranteed Low Income Housing Tax Credits	LR007 Real Estate Column (3) Line (17) + Line (19)			X	0.0000
(060)	Non-Guaranteed and All Other Low Income Housing Tax Credits	LR007 Real Estate Column (3) Line (18) + Line (20) + Line (21)	•		X	0.0000
(061)	Sch BA Real Estate Reduction - Reinsurance	LR007 Real Estate Column (3) Line (23)	•		X	0.2100
(062)	Sch BA Real Estate Increase - Reinsurance	LR007 Real Estate Column (3) Line (24)	•		X	0.2100
(002)			•		••	

[†] Denotes lines that are deducted from the total rather than added.

Denotes items that must be manually entered on the filing software.

			(1)		(2)
(0.62)	al Bi B. Iviral	Source Source	RBC Amount	Tax Factor	RBC Tax Effec
(063)	Sch BA Bond NAIC 1	LR008 Other Long-Term Assets Column (5) Line (2)	X	0.1575	=
(064)	Sch BA Bond NAIC 2	LR008 Other Long-Term Assets Column (5) Line (3)	X	0.1575	=
(065)	Sch BA Bond NAIC 3	LR008 Other Long-Term Assets Column (5) Line (4)	X	0.1575	=
(066)	Sch BA Bond NAIC 4	LR008 Other Long-Term Assets Column (5) Line (5)	X	0.1575	=
(067)	Sch BA Bond NAIC 5	LR008 Other Long-Term Assets Column (5) Line (6)	X	0.1575	=
(068)	Sch BA Bond NAIC 6	LR008 Other Long-Term Assets Column (5) Line (7)	X	0.2100	=
(069)	BA Bond Reduction - Reinsurance	LR008 Other Long-Term Assets Column (5) Line (9)	X	0.2100	=
(070)	BA Bond Increase - Reinsurance	LR008 Other Long-Term Assets Column (5) Line (10)	X	0.2100	=
(071)	BA Preferred Stock NAIC 1	LR008 Other Long-Term Assets Column (5) Line (12.3)	X	0.1575	=
(072)	BA Preferred Stock NAIC 2	LR008 Other Long-Term Assets Column (5) Line (13)	X	0.1575	=
(073)	BA Preferred Stock NAIC 3	LR008 Other Long-Term Assets Column (5) Line (14)	X	0.1575	=
(074)	BA Preferred Stock NAIC 4	LR008 Other Long-Term Assets Column (5) Line (15)	X	0.1575	=
(075)	BA Preferred Stock NAIC 5	LR008 Other Long-Term Assets Column (5) Line (16)	X	0.1575	=
(076)	BA Preferred Stock NAIC 6	LR008 Other Long-Term Assets Column (5) Line (17)	X	0.2100	=
(077)	BA Preferred Stock Reduction-Reinsurance	LR008 Other Long-Term Assets Column (5) Line (19)	X	0.2100	=
(078)	BA Preferred Stock Increase - Reinsurance	LR008 Other Long-Term Assets Column (5) Line (20)	X	0.2100	=
(079)	Rated Surplus Notes	LR008 Other Long-Term Assets Column (5) Line (31)	X	0.1575	=
(080)	Rated Capital Notes	LR008 Other Long-Term Assets Column (5) Line (41)	X	0.1575	=
(081)	BA Common Stock Affiliated	LR008 Other Long-Term Assets Column (5) Line (48.3)	X	0.2100	=
(082)	BA Collateral Loans	LR008 Other Long-Term Assets Column (5) Line (50)	X	0.1575	=
(083)	Other BA Assets	LR008 Other Long-Term Assets Column (5) Line (52.3) + LR018 Off-Balance	X	0.2100	=
		Sheet Collateral Column (3) Line (17) + Line (18)			-
(084)	Other BA Assets Reduction-Reinsurance	LR008 Other Long-Term Assets Column (5) Line (54)	X	0.2100	=
(085)	Other BA Assets Increase - Reinsurance	LR008 Other Long-Term Assets Column (5) Line (55)	X	0.2100	=
(086)	BA Mortgages - In Good Standing	LR009 Schedule BA Mortgages Column (6) Line (11)	X	0.1575	=
(087)	BA Mortgages - 90 Days Overdue	LR009 Schedule BA Mortgages Column (6) Line (15)	X	0.1575	=
(088)	BA Mortgages - In Process of Foreclosure	LR009 Schedule BA Mortgages Column (6) Line (19)	X	0.1575	=
(089)	Reduction - Reinsurance	LR009 Schedule BA Mortgages Column (6) Line (21)	X	0.2100	=
(090)	Increase - Reinsurance	LR009 Schedule BA Mortgages Column (6) Line (22)	X	0.2100	=
()	Miscellaneous				
(091)	Asset Concentration Factor	LR010 Asset Concentration Factor Column (6) Line (62) Grand Total Page	X	0.1575	=
(092)	Miscellaneous Assets	LR012 Miscellaneous Assets Column (2) Line (7)	X	0.1575	=
(093)	Derivatives - Collateral and Exchange Traded	LR012 Miscellaneous Assets Column (2) Lines (8) + (9) + (10)	X	0.1575	_
(094)	Derivatives NAIC 1	LR012 Miscellaneous Assets Column (2) Line (11)	X	0.1575	=
(095)	Derivatives NAIC 2	LR012 Miscellaneous Assets Column (2) Line (12)	X	0.1575	=
(096)	Derivatives NAIC 3	LR012 Miscellaneous Assets Column (2) Line (13)	x	0.1575	=
(097)	Derivatives NAIC 4	LR012 Miscellaneous Assets Column (2) Line (14)		0.1575	=
(098)	Derivatives NAIC 5	LR012 Miscellaneous Assets Column (2) Line (15)		0.1575	_
(099)	Derivatives NAIC 6	LR012 Miscellaneous Assets Column (2) Line (16) LR012 Miscellaneous Assets Column (2) Line (16)	X	0.1373	
(100)	Miscellaneous Assets Reduction-Reinsurance	LR012 Witscellaneous Assets Column (2) Line (19)	^^	0.2100	
(100)	Miscellaneous Assets Increase-Reinsurance	LR012 Witscellaneous Assets Column (2) Line (19) LR012 Miscellaneous Assets Column (2) Line (20)	^^	0.2100	
(101)	MISCHAROUS ASSERS HICICASC-ACHISURANCE	LINO12 INTOCHIGIROUS ASSOCIATION (2) LINE (20)	л	0.2100	

Denotes lines that are deducted from the total rather than added.

Denotes items that must be manually entered on the filing software.

			(1)		(2)	
		<u>Source</u>	RBC Amount	Tax Factor	RBC Tax Effec	<u>:t</u>
(102)	Replications	LR013 Replication (Synthetic Asset) Transactions and Mandatory	X	0.1575	=	
		Convertible Securities Column (7) Line (9999999)				
(103)	Reinsurance	LR016 Reinsurance Column (4) Line (17)	X	0.2100	=	
(104)	Investment Affiliates	LR042 Summary for Affiliated Investments Column (4) Line (6)	X	0.2100	=	
(105)	Investment in Parent	LR042 Summary for Affiliated Investments Column (4) Line (10)	X	0.2100	=	
(106)	Other Affiliate: Property and Casualty Insurers	LR042 Summary for Affiliated Investments Column (4) Line (11)	X	0.2100	=	
	not Subject to Risk-Based Capital					
(107)	Other Affiliate: Life Insurers not Subject to	LR042 Summary for Affiliated Investments Column (4) Line (12)	X	0.2100	=	
	Risk-Based Capital					
(108)	Publicly Traded Insurance Affiliates	LR042 Summary for Affiliated Investments Column (4) Line (14)	X	0.2100	=	
(109)	Subtotal for C-1o Assets	Sum of Lines (001) through (108), Recognizing the Deduction of Lines (013),				
		(014), (015), (036), (044), (049), (056), (061), (069), (077), (084), (089) and (100)			<u> </u>	
	C-0 Affiliated Common Stock					
(110)	Off-Balance Sheet and Other Items	LR017 Off-Balance Sheet and Other Items Column (5) Line (27)	X	0.1575	=	
(111)	Off-Balance Sheet Items Reduction - Reinsurance	LR017 Off-Balance Sheet and Other Items Column (5) Line (28)	X	0.2100	=	†
(112)	Off-Balance Sheet Items Increase - Reinsurance	LR017 Off-Balance Sheet and Other Items Column (5) Line (29)	X	0.2100	=	
(113)	Affiliated US Property - Casualty Insurers	LR042 Summary for Affiliated Investments Column (4) Line (1)	X	0.2100	=	
	Directly Owned					
(114)	Affiliated US Life Insurers Directly Owned	LR042 Summary for Affiliated Investments Column (4) Line (2)	X	0.2100	=	
(115)	Affiliated US Health Insurers Directly and	LR042 Summary for Affiliated Investments Column (4) Line (3)	X	0.2100	=	
	Indirectly Owned					
(116)	Affiliated US Property - Casualty Insurers	LR042 Summary for Affiliated Investments Column (4) Line (4)	X	0.2100	=	
	Indirectly Owned					
(117)	Affiliated US Life Insurers Indirectly Owned	LR042 Summary for Affiliated Investments Column (4) Line (5)	X	0.2100	=	
(118)	Affiliated Alien Life Insurers - Canadian	LR042 Summary for Affiliated Investments Column (4) Line (8)	X	0.2100	=	
(119)	Affiliated Alien Life Insurers - All Others	LR042 Summary for Affiliated Investments Column (4) Line (9)	X	0.0000	=	
(120)	Subtotal for C-0 Affiliated Common Stock	Lines (110)-(111)+(113)+(113)+(114)+(115)+(116)+(117)+(118)+(119)				
	Common Stock					
(121)	Unaffiliated Common Stock	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (17) +	X	0.2100	=	
		LR018 Off-Balance Sheet Collateral Column (3) Line (16)				
(122)	Credit for Hedging - Common Stock	LR015 Hedged Asset Common Stock Schedule Column (10) Line (0299999)	X	0.2100	=	†
(123)	Stock Reduction - Reinsurance	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (19)	X	0.2100	=	†
(124)	Stock Increase - Reinsurance	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (20)	X	0.2100	=	
(125)	BA Common Stock Unaffiliated	LR008 Other Long-Term Assets Column (5) Line (47)	X	0.2100	=	
(126)	BA Common Stock Affiliated - C-1cs	LR008 Other Long-Term Assets Column (5) Line (49.2)	X	0.2100	=	
(127)	Common Stock Concentration Factor	LR011 Common Stock Concentration Factor Column (6) Line (6)	X	0.2100	=	
(128)	NAIC 01 Working Capital Finance Notes	LR008 Other Long-Term Assets Column (5) Line (51.1)	X	0.1575	=	
(129)	NAIC 02 Working Capital Finance Notes	LR008 Other Long-Term Assets Column (5) Line (51.2)	X	0.1575	=	
(130)	Affiliated Preferred Stock and Common Stock -	LR042 Summary for Affiliated Investments Column (4) Line (7)	X	0.2100	=	
	Holding Company in Excess of Indirect Subs					
(131)	Affiliated Preferred Stock and Common Stock -	LR042 Summary for Affiliated Investments Column (4) Line (13)	X	0.2100	=	
	All Other					
(132)	Total for C-1cs Assets	Lines (121)-(122)-(123)+(124)+(125)+(126)+(127)+(128)+(129)+(130)+(131)				_
	Insurance Risk					
(133)	Disability Income Premium	LR019 Health Premiums Column (2) Lines (21) through (27)	X	0.2100	=	

[†] Denotes lines that are deducted from the total rather than added.

Denotes items that must be manually entered on the filing software.

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			(1)			(2)
		<u>Source</u>	RBC Amount	Tax Fact	or	RBC Tax Effect
(134)	Long-Term Care	LR019 Health Premiums Column (2) Line (28) + LR023 Long-Term Care	>	0.2100	=	
		Column (4) Line (7)	<u> </u>			<u> </u>
(135)	Individual & Industrial Life Insurance C-2 Risk	LR025 Life Insurance Column (2) Line (20)		0.2100	=	
(136)	Group & Credit Life Insurance C-2 Risk	LR025 Life Insurance Column (2) Lines (42) (48)	У	0.2100	=	
(136b)	Longevity C-2 Risk	LR025-A Longevity Risk Column (2) Line (5)	У	0.2100	=	
(137)	Disability and Long-Term Care Health	LR024 Health Claim Reserves Column (4) Line (9) + Line (15)	У	0.2100	=	
	Claim Reserves					
(138)	Premium Stabilization Credit	LR026 Premium Stabilization Reserves Column (2) Line (10)		0.0000	=	
(139)	Total C-2 Risk	L(133) + L(134) + L(137) + L(138) + Greatest of [Guardrail Factor * (L(135)+L(136)), Guardrail Factor *				
		L(136b), Square Root of [(L(135) + L(136))2 + L(136b)2 + 2 * (Correlation Factor) * (L(135) + L(136))				
•		* L(136b)]]				
(140)	Interest Rate Risk	LR027 Interest Rate Risk Column (3) Line (36)	>	0.2100	=	
(141)	Health Credit Risk	LR028 Health Credit Risk Column (2) Line (7)	<u> </u>	0.0000	=	<u> </u>
(142)	Market Risk	LR027 Interest Rate Risk Column (3) Line (37)	<u> </u>	0.2100	=	<u> </u>
(143)	Business Risk	LR029 Business Risk Column (2) Line (40)	<u> </u>	0.2100	=	<u> </u>
(144)	Health Administrative Expenses	LR029 Business Risk Column (2) Line (57))	0.0000	=	<u> </u>
(145)	Total Tax Effect	Lines (109) + (120) + (132) + (139) + (140) + (141) + (142) + (143) + (144)				
		·				

[†] Denotes lines that are deducted from the total rather than added.

Denotes items that must be manually entered on the filing software.

Pro©ompany Name

CALCULATION OF AUTHORIZED CONTROL LEVEL RISK-BASED CAPITAL

Insurance Affiliates and Misc. Other Amounts (C-0)

- (1) Affiliated US Property-Casualty Insurers Directly Owned
- (2) Affiliated US Life Insurers Directly Owned
- (3) Affiliated US Health Insurers Directly and Indirectly Owned
- (4) Affiliated US Property-Casualty Insurers Indirectly Owned
- (5) Affiliated US Life Insurers Indirectly Owned
- (6) Affiliated Alien Life Insurers Canadian
- (7) Affiliated Alien Life Insurers All Others
- (8) Off-Balance Sheet and Other Items
- (9) Total (C-0) Pre-Tax
- (10) (C-0) Tax Effect (11) Net (C-0) - Post-Tax

Asset Risk - Unaffiliated Common Stock and Affiliated Non-Insurance Stock (C-1cs)

- (12) Schedule D Unaffiliated Common Stock
- (13) Schedule BA Unaffiliated Common Stock
- (14) Schedule BA Affiliated Common Stock C-1cs
- (15) Common Stock Concentration Factor
- (16) Affiliated Preferred Stock and Common Stock Holding Company in Excess of Indirect Subsidiaries
- (17) Affiliated Preferred Stock and Common Stock All Other
- (18) Total (C-1cs) Pre-Tax
- (19) (C-1cs) Tax Effect
- (20) Net (C-1cs) Post-Tax

Asset Risk - All Other (C-10)

- (21) Bonds after Size Factor
- (22) Mortgages (including past due and unpaid taxes)
- (23) Unaffiliated Preferred Stock
- (24) Affiliated Preferred Stock and Common Stock Investment Subsidiaries
- (25) Affiliated Preferred Stock and Common Stock Parent
- (26) Affiliated Preferred Stock and Common Stock Property and Casualty Insurers not Subject to Risk-Based Capital
- (27) Affiliated Preferred Stock and Common Stock Life Insurers not Subject to Risk-Based
 Capital
- (28) Affiliated Preferred Stock and Common Stock Publicly Traded Insurers Held at Fair Value (excess of statement value over book value)
- (29) Separate Accounts with Guarantees

Denotes items that must be manually entered on the filing software.

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RBC Source Requirement LR042 Summary for Affiliated Investments Column (4) Line (1) LR042 Summary for Affiliated Investments Column (4) Line (2) LR042 Summary for Affiliated Investments Column (4) Line (3) LR042 Summary for Affiliated Investments Column (4) Line (4) LR042 Summary for Affiliated Investments Column (4) Line (5) LR042 Summary for Affiliated Investments Column (4) Line (8) LR042 Summary for Affiliated Investments Column (4) Line (9) LR017 Off-Balance Sheet and Other Items Column (5) Line (34) Sum of Lines (1) through (8) LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (120) Line (9) - Line (10) LR005 Unaffiliated Common Stock Column (5) Line (21) + LR018 Off-Balance Sheet Collateral Column (3) Line (16) LR008 Other Long-Term Assets Column (5) line (47) LR008 Other Long-Term Assets Column (5) line (49.2) LR011 Common Stock Concentration Factor Column (6) Line (6) LR042 Summary for Affiliated Investments Column (4) Line (7) LR042 Summary for Affiliated Investments Column (4) Line (13) Sum of Lines (12) through (17) LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (132) Line (18) - Line (19) LR002 Bonds Column (2) Line (27) + LR018 Off-Balance Sheet Collateral Column (3) Line (8) LR004 Mortgages Column (6) Line (31) LR005 Unaffiliated Preferred and Common Stock Column (5) Line (10) + LR018 Off-Balance Sheet Collateral Column (3) Line (15) LR042 Summary for Affiliated Investments Column (4) Line (6) LR042 Summary for Affiliated Investments Column (4) Line (10) LR042 Summary for Affiliated Investments Column (4) Line (11) LR042 Summary for Affiliated Investments Column (4) Line (12) LR042 Summary for Affiliated Investments Column (4) Line (14) LR006 Separate Accounts Column (3) Line (7)

CALCULATION OF AUTHORIZED CONTROL LEVEL RISK-BASED CAPITAL (CONTINUED)

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NAIC Company Code

•	Completed	aic company code
		RBC
	Source	Requirement
	LR006 Separate Accounts Column (3) Line (8)	
	LR006 Separate Accounts Column (3) Line (13)	
	LR007 Real Estate Column (3) Line (13)	
	LR007 Real Estate Column (3) Line (25)	
	LR008 Other Long-Term Assets Column (5) Line (56) + LR018 Off-Balance Sheet	
	Collateral Column (3) Line (17) + Line (18)	
	LR009 Schedule BA Mortgages Column (6) Line (23)	
	LR010 Asset Concentration Factor Column (6) Line (62) Grand Total Page	
	LR012 Miscellaneous Assets Column (2) Line (21)	
	LR013 Replication (Synthetic Asset) Transactions and Mandatory	
	Convertible Securities Column (7) Line (9999999)	
	LR016 Reinsurance Column (4) Line (17)	
	Sum of Lines (21) through (39)	
	LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (109)	
	Line (40) - Line (41)	
	LR025 Life Insurance Column (2) Line (20)	
	LR025 Life Insurance Column (2) Lines (42) (48)	
	LR025-A Longevity Risk Column (2) Line (5)	
	LR024 Health Claim Reserves Column (4) Line (18)	
	LR026 Premium Stabilization Reserves Column (2) Line (10)	
	L(45) + L(46) + Greatest of [Guardrail Factor * (L(43)+L(44)), Guardrail Factor * L(44b), Square	
	Root of [$(L(43) + L(44))2 + L(44b)2 + 2 * (Correlation Factor) * (L(43) + L(44)) * L(44b)]]$	
	LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (139)	
	Line (47) - Line (48)	
	LR027 Interest Rate Risk Column (3) Line (36)	
	LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (140)	
	Line (50) - Line (51)	
	LR028 Health Credit Risk Column (2) Line (7)	
	LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (141) Line (53) - Line (54)	
	Line (33) - Line (34)	

- (30) Synthetic GIC's (C-1o)
- (31) Surplus in Non-Guaranteed Separate Accounts
- (32) Real Estate (gross of encumbrances)
- (33) Schedule BA Real Estate (gross of encumbrances)
- (34) Other Long-Term Assets
- (35) Schedule BA Mortgages
- (36) Concentration Factor
- (37) Miscellaneous
- (38) Replication Transactions and Mandatory Convertible Securities
- (39) Reinsurance
- (40) Total (C-1o) Pre-Tax
- (41) (C-1o) Tax Effect
- (42) Net (C-1o) Post-Tax

Insurance Risk (C-2)

- (43) Individual & Industrial Life Insurance
- (44) Group & Credit Life Insurance
- (44b) Longevity Risk
- (45) Total Health Insurance
- (46) Premium Stabilization Reserve Credit
- (47) Total (C-2) Pre-Tax
- (48) (C-2) Tax Effect
- (49) Net (C-2) Post-Tax

Interest Rate Risk (C-3a)

- (50) Total Interest Rate Risk Pre-Tax
- (51) (C-3a) Tax Effect
- (52) Net (C-3a) Post-Tax

Health Credit Risk (C-3b)

- (53) Total Health Credit Risk Pre-Tax
- (54) (C-3b) Tax Effect
- (55) Net (C-3b) Post-Tax

Market Risk (C-3c)

- (56) Total Market Risk Pre-Tax
- (57) (C-3c) Tax Effect
- (58) Net (C-3c) Post-Tax
 - Denotes items that must be manually entered on the filing software.

LR027 Interest Rate Risk Column (3) Line (37)

Line (56) - Line (57)

LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (142)

CALCULATION OF A THORIZED CONTROL LEVEL RISK-BASED CAPITAL (CONTINUED)

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NAIC Company	· Code
	RBC

		Source	Requirement
	Business Risk (C-4a)		
(59)	Premium Component	LR029 Business Risk Column (2) Lines (12) + (24) + (36)	
(60)	Liability Component	LR029 Business Risk Column (2) Line (39)	
(61)	Subtotal Business Risk (C-4a) - Pre-Tax	Lines (59) + (60)	
(62)	(C-4a) Tax Effect	LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (143)	
(63)	Net (C-4a) - Post-Tax	Line (61) - Line (62)	
	Business Risk (C-4b)		
(64)	Health Administrative Expense Component of Business Risk (C-4b) - Pre-Tax	LR029 Business Risk Column (2) Line (57)	
(65)	(C-4b) Tax Effect	LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (144)	
(66)	Net (C-4b) - Post-Tax	Line (64) - Line (65)	
	Total Risk-Based Capital After Covariance Before Basic Operational Risk		
(67)	$C-0 + C-4a + Square Root of [(C-1o + C-3a)^2 + (C-1cs + C-3c)^2 + (C-2)^2 + (C-3b)^2$	REPORT AMOUNT ON PARENT COMPANY'S RBC IF APPLICABLE	
	$+ (C-4b)^2$	$L(11)+L(63) + $ Square Root of $[(L(42) + L(52))^2 + (L(20) + L(58))^2 + L(49)^2 + L(55)^2]$	
		+ L(66) ²]	
(68)	Gross Basic Operational Risk	0.03 x L(67)	
(69)	C-4a of U.S. Life Insurance Subsidiaries	Company Records	
(70)	Net Basic Operational Risk	Line (68) - (Line (63) + Line (69)) (Not less than zero)	
(71)	Primary Security Shortfall Calculated in Accordance With Actuarial Guideline XLVIII	LR036 XXX/AXXX Reinsurance Primary Security Shortfall by Cession Column (7) Line (9999999)	
(/1)	Multiplied by 2	Multiplied by 2	
	Multiplied by 2	Withinfried by 2	
(72)	Total Risk-Based Capital After Covariance (Including Basic Operational Risk and Primary Security Shortfall multiplied by 2)	Line (67) + Line (70) + Line (71)	
	Authorized Control Level Risk-Based Capital (After Covariance Adjustment and Shortfall)		
(73)	Total Risk-Based Capital After Covariance Times Fifty Percent	Line (72) x 0.50	
	Tax Sensitivity Test		
(74)	Tax Sensitivity Test: Total Risk-Based Capital After Covariance	$L(9)+L(61) + Square Root of [(L(40) + L(50))^2 + (L(18) + L(56))^2 + L(47)^2 + L(53)^2$	
		+ L(64) ²]	
(75)	Tay Sensitivity Test: Authorized Control Level Rick-Rosed Canital	Line $(74) \times 0.50$	

Denotes items that must be manually entered on the filing software.

PROPOSED 2023 UPDATE 1

LIFE INSURANCE

LR025

Basis of Factors

The factors developed represent surplus needed to provide for life insurance mortality risk, which is defined as adverse variance in life insurance deaths (i.e., insureds dying sooner than expected) over the remaining lifetime of a block of business while appropriately reflecting the pricing flexibility to adjust current mortality rates for emerging experience. The mortality risks included in the development of the factors were volatility, level, trend, and catastrophe. The factors were developed by stochastically simulating the run-off of in force life insurance blocks typical of U.S. life insurers.

The capital need, expressed as a dollar amount, is determined as the greatest present value of accumulated deficiencies at the 95th percentile of the stochastic distribution of scenarios over the remaining lifetime of a block of business while appropriately reflecting the pricing flexibility to adjust current mortality rates. Statutory losses are defined as the after-tax quantification of gross death benefits minus reserves released in excess of the mortality cost expected under the moderately adverse scenariominus mortality margin present in reserves. The after-tax statutory losses are discounted to the present by using 20-year averages for U.S. swap rates. By selecting the largest present value accumulated loss across all projection years, the solved for capital ensures non-negative capital at all projection periods. Earlier period losses are not allowed to be offset by later period gains to reduce capital. The 95th percentile is the commonly accepted statistical safety level used for Life RBC C-2 mortality risk to identify weakly capitalized companies. The after-tax capital needs are translated to a factor expressed as a percentage of the net amount at risk (NAR). The pre-tax factor is determined by taking the after-tax factor divided by (1 minus the tax rate).

The factors are differentiated between individual & industrial life and group & credit life, and by in force block size. Within individual & industrial life, the factors are differentiated into categories by contract type depending on the degree of pricing flexibility. Within group & credit life, the factors are differentiated into categories by the remaining length of the premium rate term by group contract. There are distinct factors for contracts that have remaining premium rate terms 36 months and under and for contracts that have remaining premium rate terms over 36 months. The Federal Employees' Group Life Insurance (FEGLI) and Servicemembers' Group Life Insurance (SGLI) receive a separate factor applied to the amounts in force.

Specific Instructions for Application of the Formula

Lines 2, 5 and 21-41-47 are not applicable to Fraternal Benefit Societies.

The NAR is derived for each of the factor categories using annual statement sources and company records. In Force and Reserves amounts are net of reinsurance throughout. The In Force amounts throughout derived from company records need to be consistent with the Exhibit of Life Insurance. The Reserves amounts throughout derived from company records need to be consistent with Exhibit 5, Separate Accounts Exhibit, and Schedule S.

The NAR size bands apply to the total amounts for individual & industrial life and group term & credit life. The size bands are allocated proportionately to the NAR for each of the factor categories.—Size band 1 is for NAR amounts up to \$500 million. Size band 2 is for NAR amounts greater than \$500 million and up to \$25 billion. Size band 3 is for NAR amounts greater than \$25 billion.

Pricing Flexibility for Individual & Industrial Life Insurance and Group & Credit Life Permanent Life Insurance is defined as the ability to materially adjust rates on in force contracts through changing premiums and/or non-guaranteed elements as of the valuation date and within the next 5 policy years and reflecting typical business practices. For the purposes of assessing whether business is categorized as having "Pricing Flexibility", grouping of gross amounts may be done at either the contract level or at a cohort level consistent with grouping for pricing purposes. The categorization for ceded amounts for direct insurers should be based on the terms of each reinsurance treaty. Non-affiliated reinsurers are to assess the flexibility to adjust rates on in force contracts based on the terms of each reinsurance treaty and constraints based on typical business practices. For example, if a non-affiliated

reinsurer has historical precedent for changing in force rates, then that may provide support for assigning policies to the category with pricing flexibility. Affiliated reinsurers are to assign the factor category based on the direct policies. In force contracts may move between categories throughout their remaining lifetime if the degree of pricing flexibility changes as of each valuation date. A material rate adjustment is defined as the ability to recover, on a present value basis, the difference in mortality <u>risks</u> provided for in the factors below for contracts with and without pricing flexibility. These differences in factors are shown in the Line (13) table below in the Permanent Life Flexibility Factor and Term Life Flexibility Factor columns. The flexibility factor for each category multiplied by the NAR results in the minimum dollar margin needed for a material rate adjustment, which can then be compared against margins available to adjust rates. In force contracts that have margin available that is greater than or equal to the minimum dollar margin needed may be assigned to the category for policies with pricing flexibility. Insurers may choose to assign contracts to the categories without pricing flexibility if the evaluation of margins is not completed or if the degree of pricing flexibility is uncertain.

Lines (11) and (12) <u>Individual & Industrial</u> Life Policies with Pricing Flexibility In Force and Reserves are derived from company records. Examples of products intended for this category include, but aren't limited to, participating whole life insurance, universal life insurance without secondary guarantees, and yearly renewable term insurance where scheduled premiums may be changed on an annual basis from the date of issue. The table below illustrates the RBC requirement calculation embedded in Line (13) for <u>Individual & Industrial</u> Life Policies with Pricing Flexibility.

		<u>(1)</u>		<u>(2)</u>		
Line (13)	Individual & Industrial Life Policies with Pricing	Statement Value	<u>Factor</u>	RBC Requirement	Permanent Life	Term Life
	<u>Flexibility</u>				Flexibility Factor	Flexibility Factor
	Allocation of First \$500 Million		X 000220 =		<u>0.00230</u>	<u>0.00110</u>
	Allocation of Next \$24,500 Million		X 000105 =		<u>0.00120</u>	<u>0.00065</u>
	Allocation of Over \$25,000 Million		X 000080 =		<u>0.</u> 00085	<u>0.00055</u>
	Total Individual & Industrial Life Policies with Pricing					
	Flexibility Net Amount at Risk					

Lines (14) and (15) <u>Individual & Industrial</u> Term Life Policies without Pricing Flexibility In Force and Reserves are derived from company records. Examples of products intended for this category include, but aren't limited to, level term insurance with guaranteed level premiums and yearly renewable term insurance where scheduled premiums may not be changed. The table below illustrates the RBC requirement calculation embedded in Line (16) for <u>Individual & Industrial</u> Term Life Policies without Pricing Flexibility.

	<u>(1)</u>		<u>(2)</u>
Individual & Industrial Term Life Policies without Pricing	Statement Value	<u>Factor</u>	RBC Requirement
Flexibility			_
Allocation of First \$500 Million		X 0.00280 =	
Allocation of Next \$24,500 Million		X 0.00120 =	
Allocation of Over \$25,000 Million		X 0.00085 =	
Total Individual & Industrial Term Life Policies without			
	Flexibility Allocation of First \$500 Million Allocation of Next \$24,500 Million Allocation of Over \$25,000 Million	Flexibility Allocation of First \$500 Million Allocation of Next \$24,500 Million Allocation of Over \$25,000 Million	Flexibility Allocation of First \$500 Million X 0.00280 = Allocation of Next \$24,500 Million X 0.00120 = Allocation of Over \$25,000 Million X 0.00085 =

Lines (17) and (18) <u>Individual & Industrial</u> Permanent Life Policies without Pricing Flexibility In Force and Reserves are derived from the aggregate amounts derived in lines (1) to (10) minus the amounts recorded in the other individual life categories. Examples of products intended for this category include, but aren't limited to, universal life with secondary guarantees and non-participating whole life insurance. Policies that aren't recorded in the other individual life categories default to this category which has the highest factors. The table below illustrates the RBC requirement calculation embedded in Line (19) for <u>Individual & Industrial</u> Permanent Life Policies without Pricing Flexibility.

Pricing Flexibility Net Amount at Risk

		<u>(1)</u>		<u>(2)</u>
Line (19)	Individual & Industrial Permanent Life Policies without	Statement Value	<u>Factor</u>	RBC Requirement
, ,	Pricing Flexibility			-
	Allocation of First \$500 Million		X 0.00400 =	
	Allocation of Next \$24,500 Million		X 0.00175 =	
	Allocation of Over \$25,000 Million		X 0.00120 =	
	Total Individual & Industrial Permanent Life Policies			
	without Pricing Flexibility Net Amount at Risk			

Lines (35) and (36) Group & Credit Term Life In Force and Reserves with Remaining Rate Terms 36 Months and Under are derived from company records. This category includes group term life contracts where the premium terms have 36 months or fewer until expiration or renewal. Insurers may choose to assign contracts to the category for remaining rate terms over 36 months if the evaluation of remaining rate terms is not completed. The in force amount classified in this category needs to be consistent with Exhibit 5 used for Lines (28) and (29), Separate Accounts Exhibit used for Line (30), and Schedule S used for Lines (31) and (32). Federal Employees' Group Life Insurance (FEGLI) and Servicemembers' Group Life Insurance (SGLI) contracts are excluded. The table below illustrates the RBC requirement calculation embedded in Line (37) for Group & Credit Term Life Net Amount at Risk with Remaining Rate Terms 36 Months and Under Net Amount at Risk.

		<u>(1)</u>		<u>(2)</u>
Line (37)	Group & Credit Term Life with Remaining Rate Terms 36	Statement Value	<u>Factor</u>	RBC Requirement
	Months and Under			_
	Allocation of First \$500 Million		X 0.00140 =	
	Allocation of Next \$24,500 Million		X 0.00055 =	
	Allocation of Over \$25,000 Million		X 0.00040 =	
	Total Group & Credit Term Life Net Amount at Risk with			
	Remaining Rate Terms 36 Months and Under Net Amount			
	at Risk			

Lines (38) and (39) Group & Credit Term Life In Force and Reserves with Remaining Rate Terms Over 36 Months are derived from the aggregate amounts derived in lines (21) to (34) minus the Group & Credit Life In Force and Reserves with Remaining Rate Terms 36 Months and Under in lines (35) and (36) company records. This category includes group term life contracts where the premium terms have over 36 months until expiration or renewal. FEGLI and SGLI contracts are excluded. The table below illustrates the RBC requirement calculation embedded in Line (40) for Group & Credit Life Term Net Amount at Risk with Remaining Rate Terms Over 36 Months Net Amount at Risk.

		(1)		(2)
Line (40)	Group & Credit Term Life with Remaining Rate Terms	Statement Value	<u>Factor</u>	RBC Requirement
	Over 36 Months			_
	Allocation of First \$500 Million		X 0.00190 =	
	Allocation of Next \$24,500 Million		X 0.00080 =	
	Allocation of Over \$25,000 Million		X 0.00055 =	
	Total Group & Credit <u>Term</u> Life-Net Amount at Risk with Remaining Rate Terms Over 36 Months Net Amount at			
	Risk			

Lines (41) and (42) Group & Credit Permanent Life Policies with Pricing Flexibility In Force and Reserves are derived from company records. FEGLI and SGLI contracts are excluded. The table below illustrates the RBC requirement calculation embedded in Line (43) for Group & Credit Permanent Life Policies with Pricing Flexibility Net Amount at Risk. The capital factors assigned are the same as Individual & Industrial Permanent Life Policies with Pricing Flexibility.

		<u>(1)</u>		<u>(2)</u>
Line (43)	Group & Credit Permanent Life Policies with Pricing	Statement Value	<u>Factor</u>	RBC Requirement
	Flexibility			
	Allocation of First \$500 Million		X 0.00220 =	
	Allocation of Next \$24,500 Million		X 0.00105 =	
	Allocation of Over \$25,000 Million		X 0.00080 =	
	Total Group & Credit Permanent Life Policies with			
	Pricing Flexibility Net Amount at Risk			

Lines (44) and (45) Group & Credit Permanent Life Policies without Pricing Flexibility In Force and Reserves are derived from the aggregate amounts derived in lines (21) to (34) minus the other Group & Credit life amounts derived in lines (35) to (43). FEGLI and SGLI contracts are excluded. The table below illustrates the RBC requirement calculation embedded in Line (46) for Group & Credit Permanent Life Policies without Pricing Flexibility Net Amount at Risk. The capital factors assigned are the same as Individual & Industrial Permanent Life Policies without Pricing Flexibility.

		<u>(1)</u>		<u>(2)</u>
Line (46)	Group & Credit Permanent Life Policies without Pricing	Statement Value	<u>Factor</u>	RBC Requirement
	Flexibility			
	Allocation of First \$500 Million		X 0.00400 =	
	Allocation of Next \$24,500 Million		$\overline{X \ 0.00175} =$	
	Allocation of Over \$25,000 Million		$\overline{X \ 0.00120} =$	
	Total Group & Credit Permanent Life Policies without			
	Pricing Flexibility Net Amount at Risk			

Line (4147) FEGLI/SGLI In Force amounts are retrieved from the Exhibit of Life Insurance. -The capital factor assigned is the same as the largest size band for group & credit term life contracts with remaining rate terms 36 months and under.

<u>Line</u> (4147)	FEGLI/SGLI	Statement Value	<u>Factor</u>	RBC Requirement
<u>(4147)</u>	In Force		X 0.00040 =	

All amounts should be entered as required. The risk-based capital software will calculate the RBC requirement for individual and industrial and for group and credit.

Proposed 2023 Update 2 NOTE 37 Life Insurance Net Amount at Risk by Product Characteristics

Refer to LR025 of the RBC instructions for category definitions

A. INDIVIDUAL & INDUSTRIAL LIFE

Line Defi	nitions					
(1)	Life In Force	Exhibit of Life Insurance	Amount of Insurance for Ind	ustrial and Ordinary Lif	e, Lines 21 and 22	
(2)	Exhibit 5 Life Reserves	Exhibit 5 for Industrial ar	d Ordinary Life, Lines 0199	997 and 0199998		
(3)	Separate Account Life Reserves	Separate Accounts, Exhibit 3, Column 3 Line 0199999				
(4)	Modified Coinsurance Life Reserves		n 1 Column 12 and Part 3 See would be included on Exhibi		portion which relates to policy reserve	es that, it
Table A1			Total Individual	& Industrial Life		
					(4) Net of Reinsurance	
		(1) Gross	(2) Assumed	(3) Ceded	(1) + (2) - (3)	
(1)	Life In Force					
(2)	Exhibit 5 Life Reserves					
(3)	Separate Account Life Reserves					
(4)	Modified Coinsurance Life Reserves					
(5)	Life Reserves $(2) + (3) + (4)$					
(6)	Life Net Amount at Risk (1) - (5)					
Table A2		Ĭr	ndividual & Industrial Life Po	olicies with Pricing Flex	ibility	
		-			(4) Net of Reinsurance	
		(1) Gross	(2) Assumed	(3) Ceded	(1) + (2) - (3)	
(1)	Life In Force				_	
(2)	Exhibit 5 Life Reserves					
(3)	Separate Account Life Reserves					
(4)	Modified Coinsurance Life Reserves					
(5)	Life Reserves $(2) + (3) + (4)$					
(6)	Life Net Amount at Risk (1) - (5)					
Table A3		Indivi	dual & Industrial Term Life I	Policies without Pricing	Flexibility	
14010112			dual de Industrial Term Ene I	oneres without Triems	(4) Net of Reinsurance	
		(1) Gross	(2) Assumed	(3) Ceded	(1) + (2) - (3)	
(1)	Life In Force		` ` `			
(2)	Exhibit 5 Life Reserves					
(3)	Separate Account Life Reserves					
(4)	Modified Coinsurance Life Reserves					
(5)	Life Reserves $(2) + (3) + (4)$					
(6)	Life Net Amount at Risk (1) - (5)					
Table A4		Individu	al & Industrial Permanent Lit	fe Policies without Prici	na Flevibility	
Table A4		marvidu	ar & moustriar r ermanent En	ie i oneies without i nei	(4) Net of Reinsurance	
		(1) Gross	(2) Assumed	(3) Ceded	(1) + (2) - (3)	
(1)	Life In Force			(-/ -		
(2)	Exhibit 5 Life Reserves					
(3)	Separate Account Life Reserves					
(4)	Modified Coinsurance Life Reserves					
(5)	Life Reserves $(2) + (3) + (4)$					
(6)	Life Net Amount at Risk (1) - (5)					

B. GROUP & CREDIT LIFE EXCLUDING FEGLI/SGLI

Line Defi	nitions						
(1) (2) (3)	Life In Force Exhibit 5 Life Reserves Separate Account Life Reserves	SGLI reported on lines 43 Exhibit 5 for Group and C		nd 0199998	es 21 and 22; exclude amounts for FEGLI and		
(4)	Modified Coinsurance Life Reserves		schedule S, Part 1 Section 1 Column 12 and Part 3 Section 1 Column 14, the portion which relates to policy reserves written on a direct basis, would be included on Exhibit 5.				
Table B1			Total Group & Credit Life	e Excluding FEGLI/SGI	.I		
			-		(4) Net of Reinsurance		
(1) (2) (3) (4) (5) (6)	Life In Force Exhibit 5 Life Reserves Separate Account Life Reserves Modified Coinsurance Life Reserves Life Reserves (2) + (3) + (4) Life Net Amount at Risk (1) - (5)	(1) Gross	(2) Assumed	(3) Ceded	(1)+(2)-(3)		
Table B2		Group & C	Credit Term Life with Remain	ning Rate Terms 36 Mor	nths and Under		
					(4) Net of Reinsurance		
(1) (2) (3) (4) (5) (6)	Life In Force Exhibit 5 Life Reserves Separate Account Life Reserves Modified Coinsurance Life Reserves Life Reserves (2) + (3) + (4) Life Net Amount at Risk (1) - (5)	(1) Gross	(2) Assumed	(3) Ceded	(1) + (2) - (3)		
Table B3		Group &	& Credit Term Life with Rem	naining Rate Terms Ove	r 36 Months		
					(4) Net of Reinsurance		
(1) (2) (3) (4) (5) (6)	Life In Force Exhibit 5 Life Reserves Separate Account Life Reserves Modified Coinsurance Life Reserves Life Reserves (2) + (3) + (4) Life Net Amount at Risk (1) - (5)	(1) Gross	(2) Assumed	(3) Ceded	(1) + (2) - (3)		
Table B4		Gro	up & Credit Permanent Life	Policies with Pricing Fl	exibility		
		(1) Gross	(2) Assumed	(3) Ceded	(4) Net of Reinsurance (1) + (2) - (3)		
(1) (2) (3) (4) (5) (6)	Life In Force Exhibit 5 Life Reserves Separate Account Life Reserves Modified Coinsurance Life Reserves Life Reserves (2) + (3) + (4) Life Net Amount at Risk (1) - (5)						
Table B5		Grou	p & Credit Permanent Life P	olicies without Pricing l	Flexibility		
(1) (2) (3) (4) (5)	Life In Force Exhibit 5 Life Reserves Separate Account Life Reserves Modified Coinsurance Life Reserves Life Reserves (2) + (3) + (4)	(1) Gross	(2) Assumed	(3) Ceded	(4) Net of Reinsurance (1) + (2) - (3)		
(6)	Life Net Amount at Risk (1) - (5)						

LIFE INSURANCE

LIFE INSURA	ANCE		(1)		(2)
		Annual Statement Source	Statement Value	Factor	RBC
	Individual & Industrial Life Net Amount at Risk	Amuai Statement Source	Statement value	ractor	Requirement
(1)	Ordinary Life In Force	Exhibit of Life Insurance Column 4 Line 23 x 1000			
(2)	Plus Industrial Life In Force	Exhibit of Life Insurance Column 2 Line 23 x 1000			
(3)	Total Individual & Industrial Life In Force	Lines (1) + (2)			
(4)	Outhern 116 Process	F 1/1/4 F Co. 1 4 I I 0100000			
(4)	Ordinary Life Reserves	Exhibit 5 Column 4 Line 0199999			
(5) (6)	Plus Industrial Life Reserves Plus Ordinary Life Separate Accounts	Exhibit 5 Column 3 Line 0199999 Separate Accounts Exhibit 3 Column 3 Line 0199999			
(7)	Plus Ordinary & Industrial Life Modified Coinsurance Assumed Reserves	Schedule S Part 1 Section 1 Column 12, in part ‡			
(8)	Less Ordinary & Industrial Life Modified Coinsurance Ceded Reserves	Schedule S Part 3 Section 1 Column 14, in part ‡			
(9)	Total Individual & Industrial Life Reserves	Lines (4) + (5) + (6) + (7) - (8)			
(10) (1)	Total Individual & Industrial Life Net Amount at Risk	Lines (3) - (9) Notes to Financial Statements Item 37, Table A1, Column (4), Line (6)			
(11)	Individual & Industrial Life Policies with Pricing Flexibility In Force	Company Records *			
(12) (13) (2)	Less Individual & Industrial Life Policies with Pricing Flexibility in Force Reserves Test Individual & Industrial Life Policies with Pricing Flexibility Net Assessed at Piale	Company Records * Lines (11) - (12)-Notes to Financial Statements Item 37, Table A2, Column (4), Line (6)	X	; †	_
(10) (2)	Total Individual & Industrial Life Policies with Pricing Flexibility Net Amount at Risk	takes (11) = (12) Notes to Financial Statements from 31, Table A2, Column (4), Line (6)	^	. !	
(14)	Individual & Industrial Term Life Policies without Pricing Flexibility In Force	Company Records *			
(15)	Less Individual & Industrial Term Life Policies without Pricing Flexibility Reserves	Company Records *			
(16) (3)	Total Individual & Industrial Term Life Policies without Pricing Flexibility Net Amount at Risk	Lines (14) - (15) Notes to Financial Statements Item 37, Table A3, Column (4), Line (6)	X	†	=
(17)	Individual & Industrial Permanent Life Policies without Pricing Flexibility In Force	Lines (3) - (11) - (14)			
(17) (18)	Less Individual & Industrial Permanent Life Policies without Pricing Flexibility Reserves	Lines (9) - (12) - (15)			
(19) (4)	Total Individual & Industrial Permanent Life Policies without Pricing Flexibility Net Amount at Risk	Lines (17) - (18) (1) - (2) - (3)	x	†	=
(20) (5)	Total Individual & Industrial Life	Lines (13) + (16) + (19) (2) + (3) + (4)			
	Group & Credit Life-Net Amount at Risk				
(21)	Group Life In Force	Exhibit of Life Insurance Column 9 Line 23 x 1000			
(22)	Plus Credit Life In Force	Exhibit of Life Insurance Column 6 Line 23 x 1000 Exhibit of Life Insurance Column 4 Line 43 x 1000			
(23) (24)	Less Group FEGLI In Force Less Group SGLI In Force	Exhibit of Life Insurance Column 4 Line 43 x 1000 Exhibit of Life Insurance Column 4 Line 44 x 1000			
(24) (25)	Less Credit FEGLI In Force	Exhibit of Life Insurance Column 2 Line 44 x 1000 Exhibit of Life Insurance Column 2 Line 43 x 1000			
(26)	Less Credit SGLI In Force	Exhibit of Life Insurance Column 2 Line 44 x 1000			
(20) (27)	Total Group & Credit Life In Force Excluding FEGLI/SGLI	Lines (21) + (22) - (23) - (24) - (25) - (26)			
(28)	Group Life Reserves	Exhibit 5 Column 6 Line 0199999			
(29)	Plus Credit Life Reserves	Exhibit 5 Column 5 Line 0199999			
(30)	Plus Group Life Separate Accounts	Separate Accounts Exhibit 3 Column 4 Line 0199999			
(31)	Plus Group & Credit Life Modified Coinsurance Assumed Reserves	Schedule S Part 1 Section 1 Column 12, in part ‡			
(32)	Less Group & Credit Life Modified Coinsurance Ceded Reserves	Schedule S Part 3 Section 1 Column 14, in part ‡			
(33)	Total Group & Credit Life Reserves	Lines (28) + (29) + (30) + (31) - (32)			
(34)-(6)	Total Group & Credit Life Excluding FEGLI/SGLI Net Amount at Risk-Excluding FEGLI/SGLI	Lines (27) - (33) Notes to Financial Statements Item 37, Table B1, Column (4), Line (6)			
(35)	Group & Credit Term Life In Force with Remaining Rate Terms 36 Months and Under	Company Records *			
(36)	Less Group & Credit Term Life Reserves with Remaining Rate Terms 36 Months and Under	Company Records *			
(37) (7)	Group & Credit Term Life with Remaining Rate Terms 36 Months and Under Net Amount at Risk-with Remaining Rate Terms 36 Months and Under Net Amount at Risk-with Remaining Rate Terms 36 Months and Under Net Amount at Risk-with Remaining Rate Terms 36 Months and Under Net Amount at Risk-with Remaining Rate Terms 36 Months and Under Net Amount at Risk-with Remaining Rate Terms 36 Months and Under Net Amount at Risk-with Remaining Rate Terms 36 Months and Under Net Amount at Risk-with Remaining Rate Terms 36 Months and Under Net Amount at Risk-with Remaining Rate Terms 36 Months and Under Net Amount at Risk-with Remaining Rate Terms 36 Months and Under Net Amount at Risk-with Remaining Rate Terms 36 Months and Under Net Amount at Risk-with Remaining Rate Terms 36 Months Remaining Rate Terms 86 Months Rate Terms 86 Months Remaining Rate Terms 86 Months Rate T	H Lines (35) - (36) Notes to Financial Statements Item 37, Table B2, Column (4), Line (6)	X	†	=
(20)	Complete Contract of the Free City Boards on Date Town On Manual	Live (27) (25) Common Broads &			
(38) (39)	Group & Credit Term Life In Force with Remaining Rate Terms Over 36 Months Less Group & Credit Term Life Reserves with Remaining Rate Terms Over 36 Months	Lines (27) - (35) Company Records * Lines (33) - (36) Company Records *			
(39) (40) (8)	Group & Credit Life Term Life with Remaining Rate Terms Over 36 Months Net Amount at Risk-with Ren		x	; †	=
(41) (42)	Group & Credit Permanent Life Policies with Pricing Flexibility In Force Less Group & Credit Permanent Life Policies with Pricing Flexibility Reserves	Company Records * Company Records *			
(42) (43) (9)	Group & Credit Permanent Life Policies with Pricing Flexibility Net Amount at Risk	Lines (41) - (42) Notes to Financial Statements Item 37, Table B4, Column (4), Line (6)	x	+	=
(-/(/		(,) (,) (,) (,) (,) (,) (,) (,) (,) (,)	 "	,	
(44)	Group & Credit Permanent Life Policies without Pricing Flexibility In Force	Lines (27) - (35) - (38) - (41)			
(45)	Less Group & Credit Permanent Life Policies without Pricing Flexibility Reserves	Lines (33) - (36) - (39) - (42)			
(46) (10)	Group & Credit Permanent Life Policies without Pricing Flexibility Net Amount at Risk	Lines (44) - (45) (6) - (7) - (8) - (9)	X	†	=
(41) (47) (11)	FEGLI/SGLI Life In Force	Exhibit of Life Insurance Sum of Column 2 and 4 Line 43 and 44 x 1000 $$	x	0.0004	=
(42) (48) (12)	Total Group & Credit Life	Lines (37) + (40) + (41) + (43) + (46) + (47) (7) + (8) + (9) + (10) + (11)			
(43) (49) (13)	Total Life	Lines $\frac{(20) + (42) + (48)}{(20) + (42) + (48)}$ (5) + (12)			
(10) (17)(13)	Total Life	2.110.5 (20) · (12) · (10) (5) · (12)			

- The tiered calculation is illustrated in the Life Insurance section of the risk-based capital instructions.
- Include only the portion which relates to policy reserves that, if written on a direct basis, would be included on Exhibit 5.

Proposed 2023 Update 2

LIFE INSURANCE (Clean Version)

					RBC
		Annual Statement Source	Statement Value	Factor	Requirement
	Individual & Industrial Life				
(1)	Total Individual & Industrial Life Net Amount at Risk	Notes to Financial Statements Item 37, Table A1, Column (4), Line (6)			
(2)	Total Individual & Industrial Life Policies with Pricing Flexibility Net Amount at Risk	Notes to Financial Statements Item 37, Table A2, Column (4), Line (6)	X	† =	=
(3)	Total Individual & Industrial Term Life Policies without Pricing Flexibility Net Amount at Risk	Notes to Financial Statements Item 37, Table A3, Column (4), Line (6)	X	† =	=
(4)	Total Individual & Industrial Permanent Life Policies without Pricing Flexibility Net Amount at Risk	Lines (1) - (2) - (3)	X	† =	
(5)	Total Individual & Industrial Life	Lines $(2) + (3) + (4)$			
	Group & Credit Life				
(6)	Total Group & Credit Life Excluding FEGLI/SGLI Net Amount at Risk	Notes to Financial Statements Item 37, Table B1, Column (4), Line (6)			
(7)	Group & Credit Term Life with Remaining Rate Terms 36 Months and Under Net Amount at Risk	Notes to Financial Statements Item 37, Table B2, Column (4), Line (6)	X	† =	:
(8)	Group & Credit Life Term Life with Remaining Rate Terms Over 36 Months Net Amount at Risk	Notes to Financial Statements Item 37, Table B3, Column (4), Line (6)	X	† =	=
(9)	Group & Credit Permanent Life Policies with Pricing Flexibility Net Amount at Risk	Notes to Financial Statements Item 37, Table B4, Column (4), Line (6)	X	† =	=
(10)	Group & Credit Permanent Life Policies without Pricing Flexibility Net Amount at Risk	Lines (6) - (7) - (8) - (9)	X	† =	=
(11)	FEGLI/SGLI Life In Force	Exhibit of Life Insurance Sum of Column 2 and 4 Line 43 and 44 x 1000	X	0.0004 =	=
(12)	Total Group & Credit Life	Lines $(7) + (8) + (9) + (10) + (11)$			
(13)	Total Life	Lines $(5) + (12)$			

(2)

(1)

[†] The tiered calculation is illustrated in the Life Insurance section of the risk-based capital instructions.

Proposed 2023 Update 2 PREMIUM STABILIZATION RESERVES

			(1)		(2) RBC
		Annual Statement Source	Statement Value	<u>Factor</u>	Requirement
	Group and Credit Life and Health Reported Premium Stabilization R	<u>eserves</u>			
(1)	Stabilization Reserves and Experience Rating Refunds included in Line 3	Page 3 Column 1 Line 3 in part		X	
(2)	Provision for Experience Rating Refunds	Page 3 Column 1 Line 9.2 in part		X	
(3)	Reserve for Group Rate Credits	Company Records		X	
(4)	Reserve for Credit Rate Credits	Company Records		X	
(5)	Premium Stabilization Reserves	Page 3 Column 1 Line 25 in part		X	
(6)	Total of Preliminary Premium Stabilization Reserve Credit	Sum of Lines (1) through (5)			
	Group & Credit Life and Health Risk-Based Capital				
(7)	Life	LR025 Life Insurance Column (2) Line (42) (48) (12)			
(8)	Health	LR024 Health Claim Reserves Column (4) Line (16)			
		+ [LR024 Column (4) Line (15) x 0.65] + LR019			
		Health Premiums Column (2) Lines (12), (17), (18)			
		and (19) + [[LR019 Column (2) Lines (23), (24),			
		and (27)] x 0.65] + [LR020 Underwriting Risk -			
		Experience Fluctuation Risk Column (5) Line (18) -			
(0)		Column (4) Line (18) x Line (1.2) / Line (1.3)]			
(9)	Maximum Risk-Based Capital	Lines (7) + (8)			
(10)	Final Premium Stabilization Reserve	Column (2) Line (6), but not more than Column (1) Line (9)		X	

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(2)

(1)

Proposed 2023 Update 2 CALCULATION OF TAX EFFECT FOR LIFE AND FRATERNAL RISK-BASED CAPITAL

		Source	RBC Amount	Tax Factor	RBC Tax Effect
	ASSET RISKS				
	Bonds				
(001)	Long-term Bonds - NAIC 1	LR002 Bonds Column (2) Line (2.8) + LR018 Off-Balance Sheet Collateral	X	0.1680	=
		Column (3) Line (2.8)			'
(002)	Long-term Bonds - NAIC 2	LR002 Bonds Column (2) Line (3.4) + LR018 Off-Balance Sheet Collateral	X	0.1680	=
		Column (3) Line (3.4)			
(003)	Long-term Bonds - NAIC 3	LR002 Bonds Column (2) Line (4.4) + LR018 Off-Balance Sheet Collateral	X	0.1680	=
		Column (3) Line (4.4)			
(004)	Long-term Bonds - NAIC 4	LR002 Bonds Column (2) Line (5.4) + LR018 Off-Balance Sheet Collateral	X	0.1680	=
		Column (3) Line (5.4)			'
(005)	Long-term Bonds – NAIC 5	LR002 Bonds Column (2) Line (6.4) + LR018 Off-Balance Sheet Collateral	X	0.1680	=
		Column (3) Line (6.4)			'
(006)	Long-term Bonds – NAIC 6	LR002 Bonds Column (2) Line (7) + LR018 Off-Balance Sheet Collateral	X	0.2100	=
		Column (3) Line (7)			
(007)	Short-term Bonds - NAIC 1	LR002 Bonds Column (2) Line (10.8)	X	0.1680	=
(008)	Short-term Bonds – NAIC 2	LR002 Bonds Column (2) Line (11.4)	X	0.1680	=
(009)	Short-term Bonds – NAIC 3	LR002 Bonds Column (2) Line (12.4)	X	0.1680	=
(010)	Short-term Bonds – NAIC 4	LR002 Bonds Column (2) Line (13.4)	X	0.1680	=
(011)	Short-term Bonds – NAIC 5	LR002 Bonds Column (2) Line (14.4)	X	0.1680	=
(012)	Short-term Bonds – NAIC 6	LR002 Bonds Column (2) Line (15)	X	0.2100	=
(013)	Credit for Hedging - NAIC 1 Through 5 Bonds	LR014 Hedged Asset Bond Schedule Column (13) Line (0199999)	X	0.1680	= †
(014)	Credit for Hedging - NAIC 6 Bonds	LR014 Hedged Asset Bond Schedule Column (13) Line (0299999)	X	0.2100	= †
(015)	Bond Reduction - Reinsurance	LR002 Bonds Column (2) Line (19)	X	0.2100	= †
(016)	Bond Increase - Reinsurance	LR002 Bonds Column (2) Line (20)	X	0.2100	=
(017)	Non-Exempt NAIC 1 U.S. Government Agency	LR002 Bonds Column (2) Line (22)	X	0.1680	=
(018)	Bonds Size Factor	LR002 Bonds Column (2) Line (26) - LR002 Bonds Column (2) Line (21)	X	0.1680	=
	<u>Mortgages</u>				
	In Good Standing				
(019)	Residential Mortgages - Insured	LR004 Mortgages Column (6) Line (1)	Y	0.1575	=
(020)	Residential Mortgages - Other	LR004 Mortgages Column (6) Line (2)	X	0.1575	=
(021)	Commercial Mortgages - Insured	LR004 Mortgages Column (6) Line (3)	X	0.1575	=
(022)	Total Commercial Mortgages - All Other	LR004 Mortgages Column (6) Line (9)	X	0.1575	=
(023)	Total Farm Mortgages	LR004 Mortgages Column (6) Line (15)	X	0.1575	=
()	90 Days Overdue				
(024)	Farm Mortgages	LR004 Mortgages Column (6) Line (16)	X	0.1575	=
(025)	Residential Mortgages - Insured	LR004 Mortgages Column (6) Line (17)	X	0.1575	=
(026)	Residential Mortgages - Other	LR004 Mortgages Column (6) Line (18)	X	0.1575	=
(027)	Commercial Mortgages - Insured	LR004 Mortgages Column (6) Line (19)	X	0.1575	=
(028)	Commercial Mortgages - Other	LR004 Mortgages Column (6) Line (20)	X	0.1575	=
	In Process of Foreclosure				_
(029)	Farm Mortgages	LR004 Mortgages Column (6) Line (21)	X	0.1575	=

Denotes lines that are deducted from the total rather than added.

Denotes items that must be manually entered on the filing software.

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NAIC Company Code

(2) RBC Tax Effect

			_	(1)		
(020)	D 11 (11M)	I D 0 0 4 14 () I () I () () () ()	Source	RBC Amount		Tax Factor
(030)	Residential Mortgages - Insured	LR004 Mortgages Column (6) Line (22)	:		X	0.1575
(031)	Residential Mortgages - Other	LR004 Mortgages Column (6) Line (23)			X	0.1575
(032)	Commercial Mortgages - Insured	LR004 Mortgages Column (6) Line (24)	:		X	0.1575
(033)	Commercial Mortgages - Other	LR004 Mortgages Column (6) Line (25)			X	0.1575
(034)	Due & Unpaid Taxes Mortgages	LR004 Mortgages Column (6) Line (26)			X	0.1575
(035)	Due & Unpaid Taxes - Foreclosures	LR004 Mortgages Column (6) Line (27)			X	0.1575
(036)	Mortgage Reduction - Reinsurance	LR004 Mortgages Column (6) Line (29)			X	0.2100
(037)	Mortgage Increase - Reinsurance	LR004 Mortgages Column (6) Line (30)			X	0.2100
	Preferred Stock					
(038)	Unaffiliated Preferred Stock NAIC 1	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (1)			X	0.1575
		+ LR018 Off-Balance Sheet Collateral Column (3) Line (9)				
(039)	Unaffiliated Preferred Stock NAIC 2	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (2)			X	0.1575
		+ LR018 Off-Balance Sheet Collateral Column (3) Line (10)				
(040)	Unaffiliated Preferred Stock-NAIC 3	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (3)	·		X	0.1575
		+ LR018 Off-Balance Sheet Collateral Column (3) Line (11)				
(041)	Unaffiliated Preferred Stock NAIC 4	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (4)			X	0.1575
		+ LR018 Off-Balance Sheet Collateral Column (3) Line (12)				
(042)	Unaffiliated Preferred Stock NAIC 5	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (5)			X	0.1575
		+ LR018 Off-Balance Sheet Collateral Column (3) Line (13)		-		
(043)	Unaffiliated Preferred Stock NAIC 6	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (6)			X	0.2100
		+ LR018 Off-Balance Sheet Collateral Column (3) Line (14)		-		
(044)	Preferred Stock Reduction-Reinsurance	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (8)			X	0.2100
(045)	Preferred Stock Increase-Reinsurance	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (9)	•		X	0.2100
	Separate Accounts		•			
(046)	Guaranteed Index	LR006 Separate Accounts Column (3) Line (1)			X	0.1575
(047)	Nonindex-Book Reserve	LR006 Separate Accounts Column (3) Line (2)	•		X	0.1575
(048)	Separate Accounts Nonindex-Market Reserve	LR006 Separate Accounts Column (3) Line (3)	•		X	0.1575
(049)	Separate Accounts Reduction-Reinsurance	LR006 Separate Accounts Column (3) Line (5)	•		X	0.2100
(050)	Separate Accounts Increase-Reinsurance	LR006 Separate Accounts Column (3) Line (6)	•	_	X	0.2100
(051)	Synthetic GICs	LR006 Separate Accounts Column (3) Line (8)	•		X	0.1575
(052)	Separate Account Surplus	LR006 Separate Accounts Column (3) Line (13)	•		X	0.1575
	Real Estate	* * * * * * * * * * * * * * * * * * * *	•	_		
(053)	Company Occupied Real Estate	LR007 Real Estate Column (3) Line (3)			X	0.2100
(054)	Foreclosed Real Estate	LR007 Real Estate Column (3) Line (6)	•		X	0.2100
(055)	Investment Real Estate	LR007 Real Estate Column (3) Line (9)	•	-	X	0.2100
(056)	Real Estate Reduction - Reinsurance	LR007 Real Estate Column (3) Line (11)	•		X	0.2100
(057)	Real Estate Increase - Reinsurance	LR007 Real Estate Column (3) Line (12)	•		X	0.2100
()	Schedule BA	(, (,	•	-		
(058)	Sch BA Real Estate Excluding Low Income	LR007 Real Estate Column (3) Line (16)			X	0.2100
()	Housing Tax Credits	(*) ()	•		-	
(059)	Guaranteed Low Income Housing Tax Credits	LR007 Real Estate Column (3) Line (17) + Line (19)			X	0.0000
(060)	Non-Guaranteed and All Other Low Income Housing Tax Credits	LR007 Real Estate Column (3) Line (18) + Line (20) + Line (21)	•		X	0.0000
(061)	Sch BA Real Estate Reduction - Reinsurance	LR007 Real Estate Column (3) Line (23)	•		X	0.2100
(062)	Sch BA Real Estate Increase - Reinsurance	LR007 Real Estate Column (3) Line (24)	•		X	0.2100
(002)			•		••	

[†] Denotes lines that are deducted from the total rather than added.

Denotes items that must be manually entered on the filing software.

			(1)		
		Source	RBC Amount	Tax Factor	
(063)	Sch BA Bond NAIC 1	LR008 Other Long-Term Assets Column (5) Line (2)	X		=
(064)	Sch BA Bond NAIC 2	LR008 Other Long-Term Assets Column (5) Line (3)	X		=
(065)	Sch BA Bond NAIC 3	LR008 Other Long-Term Assets Column (5) Line (4)	X	0.1575	=
(066)	Sch BA Bond NAIC 4	LR008 Other Long-Term Assets Column (5) Line (5)	X		=
(067)	Sch BA Bond NAIC 5	LR008 Other Long-Term Assets Column (5) Line (6)	X	0.1575	=
(068)	Sch BA Bond NAIC 6	LR008 Other Long-Term Assets Column (5) Line (7)	X	0.2100	=
(069)	BA Bond Reduction - Reinsurance	LR008 Other Long-Term Assets Column (5) Line (9)	X	0.2100	=
(070)	BA Bond Increase - Reinsurance	LR008 Other Long-Term Assets Column (5) Line (10)	X	0.2100	=
(071)	BA Preferred Stock NAIC 1	LR008 Other Long-Term Assets Column (5) Line (12.3)	X	0.1575	=
(072)	BA Preferred Stock NAIC 2	LR008 Other Long-Term Assets Column (5) Line (13)	X	0.1575	=
(073)	BA Preferred Stock NAIC 3	LR008 Other Long-Term Assets Column (5) Line (14)	X	0.1575	=
(074)	BA Preferred Stock NAIC 4	LR008 Other Long-Term Assets Column (5) Line (15)	X	0.1575	=
(075)	BA Preferred Stock NAIC 5	LR008 Other Long-Term Assets Column (5) Line (16)	X	0.1575	=
(076)	BA Preferred Stock NAIC 6	LR008 Other Long-Term Assets Column (5) Line (17)	X	0.2100	=
(077)	BA Preferred Stock Reduction-Reinsurance	LR008 Other Long-Term Assets Column (5) Line (19)	X	0.2100	=
(078)	BA Preferred Stock Increase - Reinsurance	LR008 Other Long-Term Assets Column (5) Line (20)	X	0.2100	=
(079)	Rated Surplus Notes	LR008 Other Long-Term Assets Column (5) Line (31)	X	0.1575	=
(080)	Rated Capital Notes	LR008 Other Long-Term Assets Column (5) Line (41)	X	0.1575	=
(081)	BA Common Stock Affiliated	LR008 Other Long-Term Assets Column (5) Line (48.3)	X	0.2100	=
(082)	BA Collateral Loans	LR008 Other Long-Term Assets Column (5) Line (50)	X	0.1575	=
(083)	Other BA Assets	LR008 Other Long-Term Assets Column (5) Line (52.3) + LR018 Off-Balance	X	0.2100	=
, ,		Sheet Collateral Column (3) Line (17) + Line (18)			
(084)	Other BA Assets Reduction-Reinsurance	LR008 Other Long-Term Assets Column (5) Line (54)	X	0.2100	=
(085)	Other BA Assets Increase - Reinsurance	LR008 Other Long-Term Assets Column (5) Line (55)	X		=
(086)	BA Mortgages - In Good Standing	LR009 Schedule BA Mortgages Column (6) Line (11)	X		=
(087)	BA Mortgages - 90 Days Overdue	LR009 Schedule BA Mortgages Column (6) Line (15)	X		=
(088)	BA Mortgages - In Process of Foreclosure	LR009 Schedule BA Mortgages Column (6) Line (19)	X	0.1575	=
(089)	Reduction - Reinsurance	LR009 Schedule BA Mortgages Column (6) Line (21)	X		=
(090)	Increase - Reinsurance	LR009 Schedule BA Mortgages Column (6) Line (22)	X	0.2100	=
()	Miscellaneous	-			_
(091)	Asset Concentration Factor	LR010 Asset Concentration Factor Column (6) Line (62) Grand Total Page	X	0.1575	=
(092)	Miscellaneous Assets	LR012 Miscellaneous Assets Column (2) Line (7)	X		=
(093)	Derivatives - Collateral and Exchange Traded	LR012 Miscellaneous Assets Column (2) Lines (8) + (9) + (10)	X		=
(094)	Derivatives NAIC 1	LR012 Miscellaneous Assets Column (2) Line (11)	X		=
(095)	Derivatives NAIC 2	LR012 Miscellaneous Assets Column (2) Line (12)	X		=
(096)	Derivatives NAIC 3	LR012 Miscellaneous Assets Column (2) Line (13)	X		
(097)	Derivatives NAIC 4	LR012 Miscellaneous Assets Column (2) Line (14)		0.1575	=
(098)	Derivatives NAIC 5	LR012 Miscellaneous Assets Column (2) Line (15)	X		
(099)	Derivatives NAIC 6	LR012 Miscellaneous Assets Column (2) Line (16)	X		
(100)	Miscellaneous Assets Reduction-Reinsurance	LR012 Miscellaneous Assets Column (2) Line (19)	X		
(101)	Miscellaneous Assets Increase-Reinsurance	LR012 Miscellaneous Assets Column (2) Line (19) LR012 Miscellaneous Assets Column (2) Line (20)	X		
()	- Indiana Italiana		^	0.2100	

Denotes lines that are deducted from the total rather than added.

Denotes items that must be manually entered on the filing software.

			(1)		(2)	
		<u>Source</u>	RBC Amount	Tax Factor	RBC Tax Effec	<u>:t</u>
(102)	Replications	LR013 Replication (Synthetic Asset) Transactions and Mandatory	X	0.1575	=	
		Convertible Securities Column (7) Line (9999999)				
(103)	Reinsurance	LR016 Reinsurance Column (4) Line (17)	X	0.2100	=	
(104)	Investment Affiliates	LR042 Summary for Affiliated Investments Column (4) Line (6)	X	0.2100	=	
(105)	Investment in Parent	LR042 Summary for Affiliated Investments Column (4) Line (10)	X	0.2100	=	
(106)	Other Affiliate: Property and Casualty Insurers	LR042 Summary for Affiliated Investments Column (4) Line (11)	X	0.2100	=	
	not Subject to Risk-Based Capital					
(107)	Other Affiliate: Life Insurers not Subject to	LR042 Summary for Affiliated Investments Column (4) Line (12)	X	0.2100	=	
	Risk-Based Capital					
(108)	Publicly Traded Insurance Affiliates	LR042 Summary for Affiliated Investments Column (4) Line (14)	X	0.2100	=	
(109)	Subtotal for C-1o Assets	Sum of Lines (001) through (108), Recognizing the Deduction of Lines (013),				
		(014), (015), (036), (044), (049), (056), (061), (069), (077), (084), (089) and (100)			<u> </u>	
	C-0 Affiliated Common Stock					
(110)	Off-Balance Sheet and Other Items	LR017 Off-Balance Sheet and Other Items Column (5) Line (27)	X	0.1575	=	
(111)	Off-Balance Sheet Items Reduction - Reinsurance	LR017 Off-Balance Sheet and Other Items Column (5) Line (28)	X	0.2100	=	†
(112)	Off-Balance Sheet Items Increase - Reinsurance	LR017 Off-Balance Sheet and Other Items Column (5) Line (29)	X	0.2100	=	
(113)	Affiliated US Property - Casualty Insurers	LR042 Summary for Affiliated Investments Column (4) Line (1)	X	0.2100	=	
	Directly Owned					
(114)	Affiliated US Life Insurers Directly Owned	LR042 Summary for Affiliated Investments Column (4) Line (2)	X	0.2100	=	
(115)	Affiliated US Health Insurers Directly and	LR042 Summary for Affiliated Investments Column (4) Line (3)	X	0.2100	=	
	Indirectly Owned					
(116)	Affiliated US Property - Casualty Insurers	LR042 Summary for Affiliated Investments Column (4) Line (4)	X	0.2100	=	
	Indirectly Owned					
(117)	Affiliated US Life Insurers Indirectly Owned	LR042 Summary for Affiliated Investments Column (4) Line (5)	X	0.2100	=	
(118)	Affiliated Alien Life Insurers - Canadian	LR042 Summary for Affiliated Investments Column (4) Line (8)	X	0.2100	=	
(119)	Affiliated Alien Life Insurers - All Others	LR042 Summary for Affiliated Investments Column (4) Line (9)	X	0.0000	=	
(120)	Subtotal for C-0 Affiliated Common Stock	Lines (110)-(111)+(113)+(113)+(114)+(115)+(116)+(117)+(118)+(119)				
	Common Stock					
(121)	Unaffiliated Common Stock	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (17) +	X	0.2100	=	
		LR018 Off-Balance Sheet Collateral Column (3) Line (16)				
(122)	Credit for Hedging - Common Stock	LR015 Hedged Asset Common Stock Schedule Column (10) Line (0299999)	X	0.2100	=	†
(123)	Stock Reduction - Reinsurance	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (19)	X	0.2100	=	†
(124)	Stock Increase - Reinsurance	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (20)	X	0.2100	=	
(125)	BA Common Stock Unaffiliated	LR008 Other Long-Term Assets Column (5) Line (47)	X	0.2100	=	
(126)	BA Common Stock Affiliated - C-1cs	LR008 Other Long-Term Assets Column (5) Line (49.2)	X	0.2100	=	
(127)	Common Stock Concentration Factor	LR011 Common Stock Concentration Factor Column (6) Line (6)	X	0.2100	=	
(128)	NAIC 01 Working Capital Finance Notes	LR008 Other Long-Term Assets Column (5) Line (51.1)	X	0.1575	=	
(129)	NAIC 02 Working Capital Finance Notes	LR008 Other Long-Term Assets Column (5) Line (51.2)	X	0.1575	=	
(130)	Affiliated Preferred Stock and Common Stock -	LR042 Summary for Affiliated Investments Column (4) Line (7)	X	0.2100	=	
	Holding Company in Excess of Indirect Subs					
(131)	Affiliated Preferred Stock and Common Stock -	LR042 Summary for Affiliated Investments Column (4) Line (13)	X	0.2100	=	
	All Other					
(132)	Total for C-1cs Assets	Lines (121)-(122)-(123)+(124)+(125)+(126)+(127)+(128)+(129)+(130)+(131)				_
	Insurance Risk					
(133)	Disability Income Premium	LR019 Health Premiums Column (2) Lines (21) through (27)	X	0.2100	=	

[†] Denotes lines that are deducted from the total rather than added.

Denotes items that must be manually entered on the filing software.

Company Name

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NAIC Company Code

			(1)				(2)
		Source	RBC Amount	Tax Fa	actor		RBC Tax Effect
(134)	Long-Term Care	LR019 Health Premiums Column (2) Line (28) + LR023 Long-Term Care	:	X 0.21	00	=	
		Column (4) Line (7)					<u> </u>
(135)	Individual & Industrial Life Insurance C-2 Risk	LR025 Life Insurance Column (2) Line (29) (5)	:	X 0.21	00	=	
(136)	Group & Credit Life Insurance C-2 Risk	LR025 Life Insurance Column (2) Line-(42) (48) (12)		X 0.21	00	=	
(136b)	Longevity C-2 Risk	LR025-A Longevity Risk Column (2) Line (5)		X 0.21	00		
(137)	Disability and Long-Term Care Health	LR024 Health Claim Reserves Column (4) Line (9) + Line (15)		X 0.21	00	=	
	Claim Reserves						
(138)	Premium Stabilization Credit	LR026 Premium Stabilization Reserves Column (2) Line (10)	:	X 0.00	00	=	
(139)	Total C-2 Risk	L(133) + L(134) + L(137) + L(138) + Greatest of [Guardrail Factor * (L(135)+L(136)), Guardrail Factor *					
		L(136b), Square Root of [$(L(135) + L(136))2 + L(136b)2 + 2 * (Correlation Factor) * (L(135) + L(136))$				_	
•		* L(136b)]]					
(140)	Interest Rate Risk	LR027 Interest Rate Risk Column (3) Line (36)		X 0.21	00	=	
(141)	Health Credit Risk	LR028 Health Credit Risk Column (2) Line (7)		X 0.00	00	=	
(142)	Market Risk	LR027 Interest Rate Risk Column (3) Line (37)		X 0.21	00	=	
(143)	Business Risk	LR029 Business Risk Column (2) Line (40)		X 0.21	00	=	
(144)	Health Administrative Expenses	LR029 Business Risk Column (2) Line (57)		X 0.00	00	=	<u> </u>
(145)	Total Tax Effect	Lines $(109) + (120) + (132) + (139) + (140) + (141) + (142) + (143) + (144)$					
						_	

[†] Denotes lines that are deducted from the total rather than added.

Denotes items that must be manually entered on the filing software.

Ргор Со раграму: Name

CALCULATION OF AUTHORIZED CONTROL LEVEL RISK-BASED CAPITAL

Insurance Affiliates and Misc. Other Amounts (C-0)

- (1) Affiliated US Property-Casualty Insurers Directly Owned
- (2) Affiliated US Life Insurers Directly Owned
- (3) Affiliated US Health Insurers Directly and Indirectly Owned
- (4) Affiliated US Property-Casualty Insurers Indirectly Owned
- (5) Affiliated US Life Insurers Indirectly Owned
- (6) Affiliated Alien Life Insurers Canadian
- (7) Affiliated Alien Life Insurers All Others
- (8) Off-Balance Sheet and Other Items
- (9) Total (C-0) Pre-Tax
- (10) (C-0) Tax Effect
- (11) Net (C-0) Post-Tax

Asset Risk - Unaffiliated Common Stock and Affiliated Non-Insurance Stock (C-1cs)

-) Schedule D Unaffiliated Common Stock
- (13) Schedule BA Unaffiliated Common Stock
- (14) Schedule BA Affiliated Common Stock C-1cs
- (15) Common Stock Concentration Factor
- (16) Affiliated Preferred Stock and Common Stock Holding Company in Excess of Indirect Subsidiaries
- (17) Affiliated Preferred Stock and Common Stock All Other
- (18) Total (C-1cs) Pre-Tax
- (19) (C-1cs) Tax Effect
- (20) Net (C-1cs) Post-Tax

Asset Risk - All Other (C-10)

- (21) Bonds after Size Factor
- (22) Mortgages (including past due and unpaid taxes)
- (23) Unaffiliated Preferred Stock
- (24) Affiliated Preferred Stock and Common Stock Investment Subsidiaries
- (25) Affiliated Preferred Stock and Common Stock Parent
- (26) Affiliated Preferred Stock and Common Stock Property and Casualty Insurers not Subject to Risk-Based Capital
- (27) Affiliated Preferred Stock and Common Stock Life Insurers not Subject to Risk-Based Capital
- (28) Affiliated Preferred Stock and Common Stock Publicly Traded Insurers Held at Fair Value (excess of statement value over book value)
- (29) Separate Accounts with Guarantees

Denotes items that must be manually entered on the filing software.

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NAIC Company Code

Source	RBC Requirement
LR042 Summary for Affiliated Investments Column (4) Line (1)	
LR042 Summary for Affiliated Investments Column (4) Line (2)	
LR042 Summary for Affiliated Investments Column (4) Line (3)	
LR042 Summary for Affiliated Investments Column (4) Line (4)	_
LR042 Summary for Affiliated Investments Column (4) Line (5)	
LR042 Summary for Affiliated Investments Column (4) Line (8)	_
LR042 Summary for Affiliated Investments Column (4) Line (9)	
LR017 Off-Balance Sheet and Other Items Column (5) Line (34)	
Sum of Lines (1) through (8)	
LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (120)	
Line (9) - Line (10)	
LR005 Unaffiliated Common Stock Column (5) Line (21) + LR018 Off-Balance Sheet	
Collateral Column (3) Line (16)	
LR008 Other Long-Term Assets Column (5) line (47)	
LR008 Other Long-Term Assets Column (5) line (49.2)	
LR011 Common Stock Concentration Factor Column (6) Line (6)	
LR042 Summary for Affiliated Investments Column (4) Line (7)	
LR042 Summary for Affiliated Investments Column (4) Line (13)	
Sum of Lines (12) through (17)	
LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (132)	
Line (18) - Line (19)	
LR002 Bonds Column (2) Line (27) + LR018 Off-Balance Sheet Collateral	
Column (3) Line (8)	<u> </u>
LR004 Mortgages Column (6) Line (31)	
LR005 Unaffiliated Preferred and Common Stock Column (5) Line (10) +	
LR018 Off-Balance Sheet Collateral Column (3) Line (15)	
LR042 Summary for Affiliated Investments Column (4) Line (6)	
LR042 Summary for Affiliated Investments Column (4) Line (10)	
LR042 Summary for Affiliated Investments Column (4) Line (11)	
LR042 Summary for Affiliated Investments Column (4) Line (12)	
LR042 Summary for Affiliated Investments Column (4) Line (14)	
LR006 Separate Accounts Column (3) Line (7)	

CALCULATION OF AUTHORIZED CONTROL LEVEL RISK-BASED CAPITAL (CONTINUED)

- (30) Synthetic GIC's (C-1o)
- (31) Surplus in Non-Guaranteed Separate Accounts
- (32) Real Estate (gross of encumbrances)
- (33) Schedule BA Real Estate (gross of encumbrances)
- (34) Other Long-Term Assets
- (35) Schedule BA Mortgages
- (36) Concentration Factor
- (37) Miscellaneous
- (38) Replication Transactions and Mandatory Convertible Securities
- (39) Reinsurance
- (40) Total (C-1o) Pre-Tax
- (41) (C-1o) Tax Effect
- (42) Net (C-1o) Post-Tax

Insurance Risk (C-2)

- (43) Individual & Industrial Life Insurance
- (44) Group & Credit Life Insurance
- (44b) Longevity Risk
- (45) Total Health Insurance
- (46) Premium Stabilization Reserve Credit
- (47) Total (C-2) Pre-Tax
- (48) (C-2) Tax Effect
- (49) Net (C-2) Post-Tax

Interest Rate Risk (C-3a)

- (50) Total Interest Rate Risk Pre-Tax
- (51) (C-3a) Tax Effect
- (52) Net (C-3a) Post-Tax

Health Credit Risk (C-3b)

- (53) Total Health Credit Risk Pre-Tax
- (54) (C-3b) Tax Effect
- (55) Net (C-3b) Post-Tax

Market Risk (C-3c)

- (56) Total Market Risk Pre-Tax
- (57) (C-3c) Tax Effect
- (58) Net (C-3c) Post-Tax

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NAIC Company Code

<u>Source</u>	Requirement
LR006 Separate Accounts Column (3) Line (8)	
LR006 Separate Accounts Column (3) Line (13)	
LR007 Real Estate Column (3) Line (13)	
LR007 Real Estate Column (3) Line (25)	
LR008 Other Long-Term Assets Column (5) Line (56) + LR018 Off-Balance Sheet	
Collateral Column (3) Line (17) + Line (18)	
LR009 Schedule BA Mortgages Column (6) Line (23)	
LR010 Asset Concentration Factor Column (6) Line (62) Grand Total Page	
LR012 Miscellaneous Assets Column (2) Line (21)	
LR013 Replication (Synthetic Asset) Transactions and Mandatory	
Convertible Securities Column (7) Line (9999999)	
LR016 Reinsurance Column (4) Line (17)	
Sum of Lines (21) through (39)	
LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (109)	
Line (40) - Line (41)	
LR025 Life Insurance Column (2) Line (20)-(5)	
LR025 Life Insurance Column (2) Line (42) (48) (12)	
LR025-A Longevity Risk Column (2) Line (5)	
LR024 Health Claim Reserves Column (4) Line (18)	
LR026 Premium Stabilization Reserves Column (2) Line (10)	
L(45) + L(46) + Greatest of [Guardrail Factor * (L(43)+L(44)), Guardrail Factor * L(44b), Square	
Root of [(L(43) + L(44))2 + L(44b)2 + 2 * (Correlation Factor) * (L(43) + L(44)) * L(44b)]]	
LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (139)	
Line (47) - Line (48)	
LR027 Interest Rate Risk Column (3) Line (36)	
LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (140)	
Line (50) - Line (51)	
LR028 Health Credit Risk Column (2) Line (7)	
LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (141)	
Line (53) - Line (54)	
LR027 Interest Rate Risk Column (3) Line (37)	
LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (142)	
Line (56) - Line (57)	

CALCULATION OF AUTHORIZED CONTROL LEVEL RISK-BASED CAPITAL (CONTINUED)

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NAIC Company Code $_{\text{RBC}}$

		Source	Requirement
	Business Risk (C-4a)		
(59)	Premium Component	LR029 Business Risk Column (2) Lines (12) + (24) + (36)	
(60)	Liability Component	LR029 Business Risk Column (2) Line (39)	
(61)	Subtotal Business Risk (C-4a) - Pre-Tax	Lines (59) + (60)	
(62)	(C-4a) Tax Effect	LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (143)	
(63)	Net (C-4a) - Post-Tax	Line (61) - Line (62)	
	Business Risk (C-4b)		
(64)	Health Administrative Expense Component of Business Risk (C-4b) - Pre-Tax	LR029 Business Risk Column (2) Line (57)	
(65)	(C-4b) Tax Effect	LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (144)	
(66)	Net (C-4b) - Post-Tax	Line (64) - Line (65)	
	Total Risk-Based Capital After Covariance Before Basic Operational Risk		
(67)	$C-0 + C-4a + Square Root of [(C-1o + C-3a)^2 + (C-1cs + C-3c)^2 + (C-2)^2 + (C-3b)^2$	REPORT AMOUNT ON PARENT COMPANY'S RBC IF APPLICABLE	
	$+ (C-4b)^2$	$L(11)+L(63) + \text{Square Root of } [(L(42) + L(52))^2 + (L(20) + L(58))^2 + L(49)^2 + L(55)^2]$	
		+ L(66) ²]	
(68)	Gross Basic Operational Risk	0.03 x L(67)	
(69)	C-4a of U.S. Life Insurance Subsidiaries	Company Records	
(70)	Net Basic Operational Risk	Line (68) - (Line (63) + Line (69)) (Not less than zero)	
(71)	Primary Security Shortfall Calculated in Accordance With Actuarial Guideline XLVIII	LR036 XXX/AXXX Reinsurance Primary Security Shortfall by Cession Column (7) Line (9999999)	
	Multiplied by 2	Multiplied by 2	
(72)	Total Risk-Based Capital After Covariance (Including Basic Operational Risk and Primary Security Shortfall multiplied by 2)	Line (67) + Line (70) + Line (71)	
	Authorized Control Level Risk-Based Capital (After Covariance Adjustment and Shortfall)		
(73)	Total Risk-Based Capital After Covariance Times Fifty Percent	Line (72) x 0.50	
	Tax Sensitivity Test		
(74)	Tax Sensitivity Test: Total Risk-Based Capital After Covariance	$L(9)+L(61) + \text{Square Root of } [(L(40) + L(50))^2 + (L(18) + L(56))^2 + L(47)^2 + L(53)^2]$	
. /		+ L(64) ²]	
(75)	Tax Sensitivity Test: Authorized Control Level Risk-Based Capital	Line (74) x 0.50	

Denotes items that must be manually entered on the filing software.

PROPOSED 2023 UPDATE 2

LIFE INSURANCE

LR025

Basis of Factors

The factors developed represent surplus needed to provide for life insurance mortality risk, which is defined as adverse variance in life insurance deaths (i.e., insureds dying sooner than expected) over the remaining lifetime of a block of business while appropriately reflecting the pricing flexibility to adjust current mortality rates for emerging experience. The mortality risks included in the development of the factors were volatility, level, trend, and catastrophe. The factors were developed by stochastically simulating the run-off of in force life insurance blocks typical of U.S. life insurers.

The capital need, expressed as a dollar amount, is determined as the greatest present value of accumulated deficiencies at the 95th percentile of the stochastic distribution of scenarios over the remaining lifetime of a block of business while appropriately reflecting the pricing flexibility to adjust current mortality rates. Statutory losses are defined as the after-tax quantification of gross death benefits minus reserves released in excess of the mortality cost expected under the moderately adverse scenariominus mortality margin present in reserves. The after-tax statutory losses are discounted to the present by using 20-year averages for U.S. swap rates. By selecting the largest present value accumulated loss across all projection years, the solved for capital ensures non-negative capital at all projection periods. Earlier period losses are not allowed to be offset by later period gains to reduce capital. The 95th percentile is the commonly accepted statistical safety level used for Life RBC C-2 mortality risk to identify weakly capitalized companies. The after-tax capital needs are translated to a factor expressed as a percentage of the net amount at risk (NAR). The pre-tax factor is determined by taking the after-tax factor divided by (1 minus the tax rate).

The factors are differentiated between individual & industrial life and group & credit life, and by in force block size. Within individual & industrial life, the factors are differentiated into categories by contract type depending on the degree of pricing flexibility. Within group & credit life, the factors are differentiated into categories by the remaining length of the premium rate term by group contract. There are distinct factors for contracts that have remaining premium rate terms 36 months and under and for contracts that have remaining premium rate terms over 36 months. The Federal Employees' Group Life Insurance (FEGLI) and Servicemembers' Group Life Insurance (SGLI) receive a separate factor applied to the amounts in force.

Specific Instructions for Application of the Formula

Lines 2, 5 and 21-41-6-11 are not applicable to Fraternal Benefit Societies.

The NAR is derived in total and for each of the factor categories using annual statement sources and company records are retrieved from the Notes to the Financial Statements Item 37 and are . In Force and Reserves amounts are net of reinsurance throughout. The In Force amounts throughout derived from company records need to be consistent with Exhibit 5, Separate Accounts Exhibit, and Schedule S.

The NAR size bands apply to the total amounts for individual & industrial life and group term & credit life. The size bands are allocated proportionately to the NAR for each of the factor categories.—Size band 1 is for NAR amounts up to \$500 million. Size band 2 is for NAR amounts greater than \$500 million and up to \$25 billion. Size band 3 is for NAR amounts greater than \$25 billion.

Pricing Flexibility for Individual & Industrial Life Insurance and Group & Credit Life Permanent Life Insurance is defined as the ability to materially adjust rates on in force contracts through changing premiums and/or non-guaranteed elements as of the valuation date and within the next 5 policy years and reflecting typical business practices. For the purposes of assessing whether business is categorized as having "Pricing Flexibility", grouping of gross amounts may be done at either the contract level or at a cohort level consistent with grouping for pricing purposes. The categorization for ceded amounts for direct insurers should be based on the terms of each reinsurance treaty. Non-affiliated reinsurers are to assess the flexibility to adjust rates on in force contracts based on the terms of each reinsurance treaty and constraints based on typical business practices. For example, if a non-affiliated

reinsurer has historical precedent for changing in force rates, then that may provide support for assigning policies to the category with pricing flexibility. Affiliated reinsurers are to assign the factor category based on the direct policies. In force contracts may move between categories throughout their remaining lifetime if the degree of pricing flexibility changes as of each valuation date. A material rate adjustment is defined as the ability to recover, on a present value basis, the difference in mortality <u>risks</u> provided for in the factors below for contracts with and without pricing flexibility. These differences in factors are shown in the Line (13) table below in the Permanent Life Flexibility Factor and Term Life Flexibility Factor columns. The flexibility factor for each category multiplied by the NAR results in the minimum dollar margin needed for a material rate adjustment, which can then be compared against margins available to adjust rates. In force contracts that have margin available that is greater than or equal to the minimum dollar margin needed may be assigned to the category for policies with pricing flexibility. Insurers may choose to assign contracts to the categories without pricing flexibility if the evaluation of margins is not completed or if the degree of pricing flexibility is uncertain.

The table below illustrates the RBC requirement calculation embedded in Line (2) for Individual & Industrial Life Policies with Pricing Flexibility. Lines (11) and (12) Life Policies with Pricing Flexibility In Force and Reserves are derived from company records. Examples of products intended for this category include, but aren't limited to, participating whole life insurance, universal life insurance without secondary guarantees, and yearly renewable term insurance where scheduled premiums may be changed on an annual basis from the date of issue. The table below illustrates the RBC requirement calculation embedded in Line (13) for Life Policies with Pricing Flexibility.

		<u>(1)</u>		<u>(2)</u>			
<u>Line</u>	Individual & Industrial Life Policies with Pricing	Statement Value	<u>Factor</u>	RBC Requirement	Permanent Life	Term Life	
(132)	Flexibility			-	Flexibility Factor	Flexibility Factor	
	Allocation of First \$500 Million		X 000220 =		0.00230	0.00110	
	Allocation of Next \$24,500 Million		X 000105 =		0.00120	0.00065	
	Allocation of Over \$25,000 Million		X 000080 =		<u>0.00085</u>	0.00055	
	Total Individual & Industrial Life Policies with Pricing						
	Flexibility Net Amount at Risk						

The table below illustrates the RBC requirement calculation embedded in Line (3) for Individual & Industrial Term Life Policies without Pricing Flexibility. Lines (14) and (15) Term Life Policies without Pricing Flexibility In Force and Reserves are derived from company records. Examples of products intended for this category include, but aren't limited to, level term insurance with guaranteed level premiums and yearly renewable term insurance where scheduled premiums may not be changed. The table below illustrates the RBC requirement calculation embedded in Line (16) for Term Life Policies without Pricing Flexibility.

		<u>(1)</u>		<u>(2)</u>
Line	Individual & Industrial Term Life Policies without Pricing	Statement Value	Factor	RBC Requirement
<u>Line</u> (163)	Flexibility		·	
	Allocation of First \$500 Million		X 0.00280 =	
	Allocation of Next \$24,500 Million		X 0.00120 =	
	Allocation of Over \$25,000 Million		X 0.00085 =	
	Total <u>Individual</u> & <u>Industrial</u> Term Life Policies without Pricing Flexibility Net Amount at Risk			

The table below illustrates the RBC requirement calculation embedded in Line (4) for Individual & Industrial Permanent Life Policies without Pricing Flexibility. Lines (17) and (18) Permanent Life Policies without Pricing Flexibility In Force and Reserves are derived from the aggregate amounts derived in lines (1) to (10) minus the amounts recorded in the other individual life categories. Examples of products intended for this category include, but aren't limited to, universal life with secondary guarantees and non-participating whole life insurance. Policies that aren't recorded in the other individual life categories default to this category which has the highest factors. The table below illustrates the RBC requirement calculation embedded in Line (19) for Permanent Life Policies without Pricing Flexibility.

		<u>(1)</u>		<u>(2)</u>
<u>Line</u>	Individual & Industrial Permanent Life Policies without	Statement Value	<u>Factor</u>	RBC Requirement
(194)	Pricing Flexibility			•
	Allocation of First \$500 Million		X 0.00400 =	
	Allocation of Next \$24,500 Million		X 0.00175 =	
	Allocation of Over \$25,000 Million		X 0.00120 =	
	Total Individual & Industrial Permanent Life Policies			
	without Pricing Flexibility Net Amount at Risk			

The table below illustrates the RBC requirement calculation embedded in Line (7) for Group & Credit Term Life with Remaining Rate Terms 36 Months and Under Net Amount at Risk_Lines (35) and (36) Group & Credit Life In Force and Reserves with Remaining Rate Terms 36 Months and Under are derived from company records. This category includes group term life contracts where the premium terms have 36 months or fewer until expiration or renewal. Insurers may choose to assign contracts to the category for remaining rate terms over 36 months if the evaluation of remaining rate terms is not completed. The in force amount classified in this category needs to be consistent with the Exhibit of Life Insurance. The reserves amount classified in this category needs to be consistent with Exhibit 5 used for Lines (28) and (29), Separate Accounts Exhibit used for Line (30), and Sehedule S used for Lines (31) and (32). Federal Employees' Group Life Insurance (FEGLI) and Servicemembers' Group Life Insurance (SGLI) contracts are excluded. The table below illustrates the RBC requirement calculation embedded in Line (37) for Group & Credit Life Net Amount at Risk with Remaining Rate Terms 36 Months and Under.

		<u>(1)</u>		<u>(2)</u>
<u>Line (37)</u>	Group & Credit Term Life with Remaining Rate Terms 36	Statement Value	<u>Factor</u>	RBC Requirement
	Months and Under			_
	Allocation of First \$500 Million		X 0.00140 =	
	Allocation of Next \$24,500 Million		X 0.00055 =	
	Allocation of Over \$25,000 Million		X 0.00040 =	
	Total Group & Credit Term Life Net Amount at Risk with			
	Remaining Rate Terms 36 Months and Under Net Amount			
	at Risk			

The table below illustrates the RBC requirement calculation embedded in Line (8) for Group & Credit Life Term with Remaining Rate Terms Over 36 Months Net Amount at Risk_Lines (38) and (39) Group & Credit Life In Force and Reserves with Remaining Rate Terms Over 36 Months are derived from the aggregate amounts derived in lines (21) to (34) minus the Group & Credit Life In Force and Reserves with Remaining Rate Terms 36 Months and Under in lines (35) and (36). This category includes group term life contracts where the premium terms have over 36 months until expiration or renewal. FEGLI and SGLI contracts are excluded. The table below illustrates the RBC requirement calculation embedded in Line (40) for Group & Credit Life Net Amount at Risk with Remaining Rate Terms Over 36 Months.

		(1)		(2)
<u>Line</u>	Group & Credit Term Life with Remaining Rate Terms	Statement Value	<u>Factor</u>	RBC Requirement
(40 8)	Over 36 Months			-
	Allocation of First \$500 Million		X 0.00190 =	
	Allocation of Next \$24,500 Million		X 0.00080 =	
	Allocation of Over \$25,000 Million		X 0.00055 =	
	Total Group & Credit Term Life Net Amount at Risk with			
	Remaining Rate Terms Over 36 Months Net Amount at	·		

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The table below illustrates the RBC requirement calculati	on embedded in Line (9) for Group &	Credit Permanent Life Policies	with Pricing Flexibility	Net Amount at Risk. The
capital factors assigned are the same as Individual & Indust	rial Permanent Life Policies with Pricin	g Flexibility. FEGLI and SGLI c	contracts are excluded.	

		<u>(1)</u>		<u>(2)</u>
Line (9)	Group & Credit Permanent Life Policies with Pricing	Statement Value	<u>Factor</u>	RBC Requirement
	<u>Flexibility</u>			
	Allocation of First \$500 Million		X 0.00220 =	
	Allocation of Next \$24,500 Million		X 0.00105 =	
	Allocation of Over \$25,000 Million		X 0.00080 =	
	Total Group & Credit Permanent Life Policies with			
	Pricing Flexibility Net Amount at Risk			

The table below illustrates the RBC requirement calculation embedded in Line (10) for Group & Credit Permanent Life Policies without Pricing Flexibility Net Amount at Risk. The capital factors assigned are the same as Individual & Industrial Permanent Life Policies without Pricing Flexibility. FEGLI and SGLI contracts are excluded.

		<u>(1)</u>		<u>(2)</u>
Line (10)	Group & Credit Permanent Life Policies without Pricing	Statement Value	<u>Factor</u>	RBC Requirement
	<u>Flexibility</u>			
	Allocation of First \$500 Million		X 0.00400 =	
	Allocation of Next \$24,500 Million		X 0.00175 =	
	Allocation of Over \$25,000 Million		X 0.00120 =	
	Total Group & Credit Permanent Life Policies without			
	Pricing Flexibility Net Amount at Risk			

Line (4111) FEGLI/SGLI In Force amounts are retrieved from the Exhibit of Life Insurance. -The capital factor assigned is the same as the largest size band for group & credit term life contracts with remaining rate terms 36 months and under.

		(1)		(2)
Line	FEGLI/SGLI	Statement Value	<u>Factor</u>	RBC Requirement
<u>(4111)</u>				
	In Force		X 0.00040 =	

All amounts should be entered as required. The risk-based capital software will calculate the RBC requirement for individual and industrial and for group and credit.