

Capital Adequacy (E) Task Force

RBC Proposal Form

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| <input type="checkbox"/> Capital Adequacy (E) Task Force | <input checked="" type="checkbox"/> Health RBC (E) Working Group | <input type="checkbox"/> Life RBC (E) Working Group |
| <input type="checkbox"/> Catastrophe Risk (E) Subgroup | <input type="checkbox"/> Investment RBC (E) Working Group | <input type="checkbox"/> SMI RBC (E) Subgroup |
| <input type="checkbox"/> C3 Phase II/ AG43 (E/A) Subgroup | <input type="checkbox"/> P/C RBC (E) Working Group | <input type="checkbox"/> Stress Testing (E) Subgroup |

<p style="text-align: right;">DATE: <u>04/23/2021</u></p> <p>CONTACT PERSON: <u>Crystal Brown</u></p> <p>TELEPHONE: <u>816-783-8146</u></p> <p>EMAIL ADDRESS: <u>cbrown@naic.org</u></p> <p>ON BEHALF OF: <u>Health RBC (E) Working Group</u></p> <p>NAME: <u>Steve Drutz</u></p> <p>TITLE: <u>Chief Financial Analyst/Chair</u></p> <p>AFFILIATION: <u>WA Office of Insurance Commissioner</u></p> <p>ADDRESS: <u>5000 Capitol Blvd SE</u> <u>Tumwater, WA 98501</u></p>	<p style="text-align: center;"><u>FOR NAIC USE ONLY</u></p> <p>Agenda Item # <u>2021-09-H</u></p> <p>Year <u>2021</u></p> <p style="text-align: center;"><u>DISPOSITION</u></p> <p><input type="checkbox"/> ADOPTED _____</p> <p><input type="checkbox"/> REJECTED _____</p> <p><input type="checkbox"/> DEFERRED TO _____</p> <p><input type="checkbox"/> REFERRED TO OTHER NAIC GROUP _____</p> <p><input checked="" type="checkbox"/> EXPOSED <u>May 17, 2021</u></p> <p><input type="checkbox"/> OTHER (SPECIFY) _____</p>
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IDENTIFICATION OF SOURCE AND FORM(S)/INSTRUCTIONS TO BE CHANGED

- | | | |
|--|--|--------------------------------------|
| <input checked="" type="checkbox"/> Health RBC Blanks | <input checked="" type="checkbox"/> Health RBC Instructions | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> Life and Fraternal RBC Blanks | <input type="checkbox"/> Life and Fraternal RBC Instructions | |
| <input type="checkbox"/> Property/Casualty RBC Blanks | <input type="checkbox"/> Property/Casualty RBC Instructions | |

DESCRIPTION OF CHANGE(S)

Incorporate the factors for the 20 NAIC Designation Category Bonds based on a five-year time horizon for page XR006, XR007 and XR012. Modify the instructions to incorporate references for the bonds.

REASON OR JUSTIFICATION FOR CHANGE **

The reason for the change is to incorporate the new bond factors for the 20 NAIC Designation Categories for a five-year time horizon in both the blank and instructions. The factor includes the bond portfolio adjustment.

Additional Staff Comments:

4-23-21 cgb The Working Group agreed to expose the proposal with the 5-year time horizon bond factors for a 20-day comment period ending on May 17, 2021.

** This section must be completed on all forms.

Revised 11-2013

OFF-BALANCE SHEET SECURITY LENDING COLLATERAL AND SCHEDULE DL, PART 1 ASSETS XR006

Security lending programs are required to maintain collateral. Some entities post the collateral supporting security lending programs on their financial statements and incur the related risk charges on those assets. Other entities have collateral that is not recorded on their financial statements. While not recorded on the financial statements of the company, such collateral has risks that are not otherwise captured in the RBC formula.

The collateral in these accounts is maintained by a third party (typically a bank or other agent). The collateral agent maintains on behalf of the company detail asset listings of the collateral assets, and this data is the source for preparation of this schedule. The company should maintain such asset listings, at a minimum CUSIP, market value, book/adjusted carrying value, and maturity date.

The asset risk charges are derived from existing RBC factors for bonds, preferred and common stocks, other invested assets, and invested assets not otherwise classified (aggregate write-ins).

Specific Instructions for Application of the Formula

Column (2) – Schedule DL, Part 1 Book/Adjusted Carrying Value comes from Annual Statement Schedule DL, Part 1, Column (6) Securities Lending Collateral Assets reported On-Balance Sheet (Assets Page, Line 10).

Off-balance sheet collateral included in General Interrogatories Part 1, Lines 24.05 and 24.06 of the annual statement should agree with Line (40), Column (1).

Lines (1) through (27) – Bonds – Bond factors described on page XR007 – Fixed Income Assets.

Line (28) through (34) – Preferred Stock – Preferred stock factors described on page XR010 – Equity Assets.

Line (35) – Common Stock – Common stock factors described on page XR010 – Equity Assets.

Line (36) – Real Estate and Property and Equipment Assets – Real Estate and Property and Equipment Assets factors described on page XR011 – Property & Equipment Assets.

Line (37) – Other Invested Assets – Other invested assets factor described on page XR008 – Fixed Income Assets.

Line (38) – Mortgage Loans on Real Estate – Mortgage Loans on Real Estate factors described on page XR008 – Fixed Income Assets.

Line (39) – Cash, Cash Equivalents and Short-Term Investments – Cash, Cash Equivalents and Short-Term Investments factors described on page XR008 – Fixed Income Assets.

FIXED INCOME ASSETS XR007 AND XR008

The RBC requirement for fixed income assets is largely driven by the default risk on those assets. There are two major subcategories: Bonds and Miscellaneous. Bonds include item that meet the definition of a bond, regardless if the bond is long-term (reported on Schedule D-1), short-term (reported on schedule DA) or a cash equivalent

(reported on Schedule E-2.) Miscellaneous fixed income assets include non-bond items reported on the cash equivalent and short-term schedules, derivatives, mortgage loans, collateral loans, and other items reported on Schedule BA: Other Long-Term Invested Assets.

Bonds (XR007)

The bond factors for investment grade bonds (NAIC Designation Category (1.A-2.C) are based on cash flow modeling. Each bond of a portfolio was annually tested for default (based on a “roll of the dice”) where the default probability varies by NAIC Designation Category and that year’s economic environment. The default probabilities were based on historical data intended to reflect a complete business cycle of favorable and unfavorable credit environments.

The risk of default was measured over a ~~five~~-year time horizon, based on the duration of ~~assets or liabilities~~ held for health companies.

The factors for NAIC Designation Category 3.A to 6 recognize that these non-investment grade bonds are reported at the lower of amortized cost or fair value. These bond risk factors are based on the market value fluctuation for each of the NAIC designation category compared to the market value fluctuation of stocks during the 2008-2009 financial crisis.

While the life and property/casualty formulas have a separate calculation for the bond size factor (based on the number of issuers in the RBC filer's portfolio), the health formula does not include a separate calculation, instead a bond size component was incorporated into the bond factors. A representative portfolio of 382 issuers was used in calculating the bond risk factors.

There is no RBC requirement for bonds guaranteed by the full faith and credit of the United States, Other U.S. Government Obligations, and securities on the NAIC U.S. Government Money Market Fund List because it is assumed that there is no default risk associated with U.S. Government issued securities.

The book/adjusted carrying value of all bonds should be reported in Columns (1), (2) or (3). The bonds are split into twenty-one different risk classifications. These risk classifications are based on the NAIC Designation Category as defined and permitted in the Purposes and Procedures Manual of the NAIC Investment Analysis Office. The subtotal of Columns (1), (2) and (3) will be calculated in Column (4). The RBC requirement will be automatically calculated in Column (5).

Miscellaneous Fixed Income Assets (XR008)

The factor for cash is 0.3 percent. It is recognized that there is a small risk related to possible insolvency of the bank where cash deposits are held. This factor was based on the original unaffiliated NAIC 01 bond risk factor prior to the increased granularity of the NAIC Designation Categories in 2021, and reflects the short-term nature of this risk. The required risk-based capital for cash will not be less than zero, even if the company’s cash position is negative.

The Short-Term Investments to be included in this section are those short-term investments not reflected elsewhere in the formula. The 0.3 percent factor is equal to the factor for cash. The amount reported in Line (35) reflects the total from Schedule DA: Short-Term Investments (Line 33), less the short-term bonds (Line 34). (The short-term bonds reported in Line (34) should equal Schedule DA, Part 1, Column 7, Line 8399999.)

Mortgage loans (reported on Schedule B) and Derivatives (reported on Schedule DB) receive a factor of 5 percent, consistent with other risk-based capital formulas studied by the Working Group.

The following investment types are captured on Schedule BA: Other Long-Term Invested Assets. Specific factors have been established for certain Schedule BA assets based on the nature of the investment. Those Schedule BA assets not specifically identified below receive a 20 percent factor (Line (43)).

- Collateral Loans reported on Line (40) receive a factor of 5 percent, consistent with other risk-based capital formulas studied by the Working Group.

- Working Capital Finance Investments: The book adjusted carrying value of NAIC 01 and 02 Working Capital Finance Investments, Lines (41) and (42), should equal the Notes to Financial Statement, Lines 5M(01a) and 5M(01b), Column 3 of the annual statement.
- Low income housing tax credit investments are reported in Column (1) in accordance with *SSAP No. 93—Low Income Housing Tax Credit Property Investments*.
 - Federal Guaranteed Low-Income Housing Tax Credit (LIHTC) investments are to be included in Line (44). There must be an all-inclusive guarantee from an ARO-rated entity that guarantees the yield on the investment.
 - Federal Non-Guaranteed LIHTC investments with the following risk mitigation factors are to be included in Line (45):
 - a) A level of leverage below 50 percent. For a LIHTC Fund, the level of leverage is measured at the fund level.
 - b) There is a tax credit guarantee agreement from general partner or managing member. This agreement requires the general partner or managing member to reimburse investors for any shortfalls in tax credits due to errors of compliance, for the life of the partnership. For an LIHTC fund, a tax credit guarantee is required from the developers of the lower-tier LIHTC properties to the upper-tier partnership.
 - State Guaranteed LIHTC investments that at a minimum meet the federal requirements for guaranteed LIHTC investments are to be included in Line (46).
 - State Non-Guaranteed LIHTC investments that at a minimum meet the federal requirements for non-guaranteed LIHTC investments are to be included on Line (47).
 - All Other LIHTC investments, state and federal LIHTC investments that do not meet the requirements of Lines (44) through (47) would be reported on Line (48).

EQUITY ASSETS

XR010

Unaffiliated Preferred Stocks

Experience data to develop preferred stock factors is not readily available; however, it is believed that preferred stocks are somewhat more likely to default than bonds. The loss on default would be somewhat higher than that experienced on bonds; however, formula factors are equal to bond factors.

The RBC requirements for unaffiliated preferred stocks are based on the NAIC designation. Column (1) amounts are from Schedule D, Part 2, Section 1 not including affiliated preferred stock. The preferred stocks must be broken out by asset designation (NAIC 01 through NAIC 06) and these individual groups are to be entered in the appropriate lines. The total amount of unaffiliated preferred stock reported should equal annual statement Page 2, Column 3, Line 2.1, less any affiliated preferred stock in Schedule D Summary by Country, Column 1, Line 18.

Unaffiliated Common Stock

Federal Home Loan Bank Stock has characteristics more like a fixed income instrument rather than common stock. A 2.3 percent factor was chosen. The factor for other unaffiliated common stock is based on studies which indicate that a 10 percent to 12 percent factor is needed to provide capital to cover approximately 95 percent of the greatest losses in common stock over a one-year future period. The higher factor of 15 percent contained in the formula reflects the increased risk when testing a period in excess of one year. This factor assumes capital losses are unrealized and not subject to favorable tax treatment at the time of loss in market value.

ASSET CONCENTRATION

XR012

The purpose of the asset concentration calculation is to reflect the additional risk of high concentrations of certain types of assets in single exposures, termed “issuers.” An issuer is a single entity, such as IBM or the Ford Motor Company. When the reporting entity has a large portion of its asset portfolio concentrated in only a few issuers, there is a heightened risk of insolvency if one of those issuers should default. An issuer may be represented in the reporting entity’s investment portfolio by a single security designation, such as a large block of NAIC Designation Category 2.A bonds, or a combination of various securities, such as common stocks, preferred stocks, and bonds. The additional RBC for asset concentration is applied to the ten largest issuers.

Concentrated investments in certain types of assets are not expected to represent an additional risk over and above the general risk of the asset itself. Therefore, prior to determining the ten largest issuers, you should exclude those assets that are exempt from the asset concentration factor. Asset types that are excluded from the calculation include: NAIC 06 bonds, unaffiliated preferred stock; affiliated common stock; affiliated preferred stock; property and equipment; U.S. government full faith and credit, other U.S. government obligations, and NAIC U.S. government money market fund list securities; NAIC 01 bonds and unaffiliated preferred stock; any other asset categories with risk-based capital factors less than 1 percent, and investment companies (mutual funds) and common trust funds that are diversified within the meaning of the federal Investment Company Act of 1940 [Section 5(b) (1)]. The pro rata share of individual securities within an investment company (mutual fund) or common trust fund are to be included in the determination of concentrated investments, subject to the exclusions identified.

With respect to investment companies (mutual funds) and common trust funds, the reporting entity is responsible for maintaining the appropriate documentation as evidence that such is diversified within the meaning of the federal Investment Company Act and providing this information upon request of the Commissioner, Director or Superintendent of the Department of Insurance. The reporting entity is also responsible for maintaining a listing of the individual securities and corresponding book/adjusted carrying values making up its investment companies (mutual funds) and common trust funds portfolio, in order to determine whether a concentration charge is necessary. This information should be provided to the Commissioner, Director or Superintendent upon request.

The assets that **ARE INCLUDED** in the calculation when determining the 10 largest issuers are as follows:

- NAIC Designation Category 2.A – 2.C Bonds
- NAIC Designation Category 3.A – 3.C Bonds
- NAIC Designation Category 4.A – 4.C Bonds
- NAIC Designation Category 5.A – 5.C Bonds
- Collateral Loans
- Mortgage Loans
- NAIC 02 Unaffiliated Preferred Stock
- NAIC 03 Unaffiliated Preferred Stock
- NAIC 04 Unaffiliated Preferred Stock
- NAIC 05 Unaffiliated Preferred Stock
- Other Long-Term Assets
- NAIC 02 Working Capital Finance Investments
- Federal Guaranteed Low Income Housing Tax Credits
- Federal Non-Guaranteed Low Income Housing Tax Credits
- State Guaranteed Low Income Housing Tax Credits
- State Non-Guaranteed Low Income Housing Tax Credits

All Other Low Income Housing Tax Credits
Unaffiliated Common Stock

The concentration factor basically doubles the risk-based capital factor (up to a maximum of 30 percent) for assets held in the 10 largest issuers. Since the risk-based capital of the assets included in the concentration factor has already been counted once in the basic formula, this factor itself only serves to add an additional risk-based capital requirement on these assets.

The name of each of the largest 10 issuers is entered at the top of the table and the appropriate statement amounts are entered in Column (2), Lines (1) through (26). Aggregate all similar asset types before entering the amount in Column (2). To determine the 10 largest issuers, first pool all of the assets subject to the concentration factor. From this pool, aggregate the various securities by issuer. The aggregate book/adjusted carrying values for the assets are computed, and the 10 largest are subject to the concentration factor. For example, an organization might own \$6,000,000 in NAIC Designation Category 2.A bonds of IBM, plus \$4,000,000 in NAIC Designation Category 2.C plus \$5,000,000 of common stock. The total investment in that issuer is \$15,000,000. If that is the largest issuer, then the identifier ("IBM Corporation") would be entered in the space allowed for the first Issuer Name, and the \$6,000,000 would be entered under the book/adjusted carrying value column for Line (1) (NAIC Designation Category 2.A Bonds) \$4,000,000 would be entered on Line (3) (NAIC Designation Category 2.C Bonds) and the \$5,000,000 would be entered on Line (22) (Unaffiliated Common Stock).

Replicated assets other than synthetically created indices should be included in the asset concentration calculation in the same manner as other assets.

OFF-BALANCE SHEET SECURITY LENDING COLLATERAL AND SCHEDULE DL, PART 1 ASSETS

Asset Category	Annual Statement Source	(1) Off-Balance Sheet Collateral Book/Adjusted Carrying Value	(2) Schedule DL, Part 1 Book/Adjusted Carrying Value	(3) Subtotal	Factor	(4) RBC Requirement
<u>Fixed Income Assets</u>						
<u>Bonds</u>						
(1) NAIC 1.A - U.S. Government Full Faith and Credit, Other U.S. Government Obligations, and NAIC U.S. Government Money Market Fund List (Refer to A/S Instructions)	Company Records	0	0	0	0.000	0
(2) NAIC Designation Category 1.A Bonds	Company Records	0	0	0	0.003	0
(3) NAIC Designation Category 1.B Bonds	Company Records	0	0	0	0.005	0
(4) NAIC Designation Category 1.C Bonds	Company Records	0	0	0	0.008	0
(5) NAIC Designation Category 1.D Bonds	Company Records	0	0	0	0.011	0
(6) NAIC Designation Category 1.E Bonds	Company Records	0	0	0	0.014	0
(7) NAIC Designation Category 1.F Bonds	Company Records	0	0	0	0.016	0
(8) NAIC Designation Category 1.G Bonds	Company Records	0	0	0	0.019	0
(9) Total NAIC 01 Bonds	Sum of Lines (1) through (8)	0	0	0		0
(10) NAIC Designation Category 2.A Bonds	Company Records	0	0	0	0.022	0
(11) NAIC Designation Category 2.B Bonds	Company Records	0	0	0	0.025	0
(12) NAIC Designation Category 2.C Bonds	Company Records	0	0	0	0.031	0
(13) Total NAIC 02 Bonds	Sum of Lines (10) through (12)	0	0	0		0
(14) NAIC Designation Category 3.A Bonds	Company Records	0	0	0	0.069	0
(15) NAIC Designation Category 3.B Bonds	Company Records	0	0	0	0.076	0
(16) NAIC Designation Category 3.C Bonds	Company Records	0	0	0	0.083	0
(17) Total NAIC 03 Bonds	Sum of Lines (14) through (16)	0	0	0		0
(18) NAIC Designation Category 4.A Bonds	Company Records	0	0	0	0.089	0
(19) NAIC Designation Category 4.B Bonds	Company Records	0	0	0	0.097	0
(20) NAIC Designation Category 4.C Bonds	Company Records	0	0	0	0.110	0
(21) Total NAIC 04 Bonds	Sum of Lines (18) through (20)	0	0	0		0
(22) NAIC Designation Category 5.A Bonds	Company Records	0	0	0	0.123	0
(23) NAIC Designation Category 5.B Bonds	Company Records	0	0	0	0.137	0
(24) NAIC Designation Category 5.C Bonds	Company Records	0	0	0	0.151	0
(25) Total NAIC 05 Bonds	Sum of Lines (22) through (24)	0	0	0		0
(26) Total NAIC 06 Bonds	Company Records	0	0	0	0.300	0
(27) Total Bonds	Lines (9) + (13) + (17) + (21) + (25) + (26)	0	0	0		0
<u>Equity Assets</u>						
<u>Preferred Stock - Unaffiliated</u>						
(28) NAIC 01 Unaffiliated Preferred Stock	Company Records			0	0.003	0
(29) NAIC 02 Unaffiliated Preferred Stock	Company Records			0	0.010	0
(30) NAIC 03 Unaffiliated Preferred Stock	Company Records			0	0.020	0
(31) NAIC 04 Unaffiliated Preferred Stock	Company Records			0	0.045	0
(32) NAIC 05 Unaffiliated Preferred Stock	Company Records			0	0.100	0
(33) NAIC 06 Unaffiliated Preferred Stock	Company Records			0	0.300	0
(34) Total Unaffiliated Preferred Stock	Sum of Lines (28) through (33)	0	0	0		0
(35) Unaffiliated Common Stock	Company Records			0	0.150	0
(36) Real Estate and Property & Equipment Assets	Company Records			0	0.100	0
(37) Other Invested Assets	Company Records			0	0.200	0
(38) Mortgage Loans on Real Estate	Company Records			0	0.050	0
(39) Cash, Cash Equivalents and Short-Term Investments (Not reported on Bonds above)	Company Records			0	0.003	0
(40) Total	Lines (27) + (34) + (35) + (36) + (37) + (38) + (39)	0	0	0		0

Denotes items that must be manually entered on the filing software

**FIXED INCOME ASSETS
BONDS**

		(1)	(2)	(3)	(4)	(5)
	Annual Statement Source	Long-Term Bonds Schedule D, Part 1 Book/Adjusted Carrying Value L2 thru 26 = Sch D Pt1F	Short-Term Investments Schedule DA, Part 1 Book/Adjusted Carrying Value L2 thru 26 = Sch DA Pt1F	Cash Equivalents Schedule E, Part 2 Book/Adjusted Carrying Value L2 thr 26 = Sch E Pt2F	Subtotal C(1) + C(2) + C(3)	RBC Requirement
(1)	NAIC 1.A - U.S. Government Full Faith and Credit, Other U.S. Government Obligations, and NAIC U.S. Government Money Market Fund List (Refer to A/S Instructions)	C(1)=Sch D, Pt 1, C11 L0599999 C(2)=Sch DA, Pt 1, C7 L0599999 C(3)=Sch E, Pt 2, C7 L0599999 + L8599999				
(2)	NAIC Designation Category 1.A	Footnote Amt 1 L000001A - L(1)				
(3)	NAIC Designation Category 1.B	Footnote Amt 2 L000001A				
(4)	NAIC Designation Category 1.C	Footnote Amt 3 L000001A				
(5)	NAIC Designation Category 1.D	Footnote Amt 4 L000001A				
(6)	NAIC Designation Category 1.E	Footnote Amt 5 L000001A				
(7)	NAIC Designation Category 1.F	Footnote Amt 6 L000001A				
(8)	NAIC Designation Category 1.G	Footnote Amt 7 L000001A				
(9)	Total NAIC 01 Bonds	Sum of Ls (1) through (8)				
(10)	NAIC Designation Category 2.A	Footnote Amt 1 L000001B				
(11)	NAIC Designation Category 2.B	Footnote Amt 2 L000001B				
(12)	NAIC Designation Category 2.C	Footnote Amt 3 L000001B				
(13)	Total NAIC 02 Bonds	Sum of Ls (10) through (12)				
(14)	NAIC Designation Category 3.A	Footnote Amt 1 L000001C				
(15)	NAIC Designation Category 3.B	Footnote Amt 2 L000001C				
(16)	NAIC Designation Category 3.C	Footnote Amt 3 L000001C				
(17)	Total NAIC 03 Bonds	Sum of Ls (14) through (16)				
(18)	NAIC Designation Category 4.A	Footnote Amt 1 L000001D				
(19)	NAIC Designation Category 4.B	Footnote Amt 2 L000001D				
(20)	NAIC Designation Category 4.C	Footnote Amt 3 L000001D				
(21)	Total NAIC 04 Bonds	Sum of Ls (18) through (20)				
(22)	NAIC Designation Category 5.A	Footnote Amt 1 L000001E				
(23)	NAIC Designation Category 5.B	Footnote Amt 2 L000001E				
(24)	NAIC Designation Category 5.C	Footnote Amt 3 L000001E				
(25)	Total NAIC 05 Bonds	Sum of Ls (22) through (24)				
(26)	Total NAIC 06 Bonds	Footnote Amt 1 L000001F				
(27)	Total Bonds RBC	L(9) + L(13) + L(17) + L(21) + L(25) + L(26)				

 Denotes items that must be vendor linked.

ASSET CONCENTRATION

		(1)		
Issuer Name				
Issuer		(2)	Factor	(3)
		Bk/Adj Carrying Value		Additional RBC
01	(1) NAIC Designation Category 2.A Bonds		0.0220	\$0
01	(2) NAIC Designation Category 2.B Bonds		0.0250	\$0
01	(3) NAIC Designation Category 2.C Bonds		0.0310	\$0
01	(4) NAIC Designation Category 3.A Bonds		0.0690	\$0
01	(5) NAIC Designation Category 3.B Bonds		0.0760	\$0
01	(6) NAIC Designation Category 3.C Bonds		0.0830	\$0
01	(7) NAIC Designation Category 4.A Bonds		0.0890	\$0
01	(8) NAIC Designation Category 4.B Bonds		0.0970	\$0
01	(9) NAIC Designation Category 4.C Bonds		0.1100	\$0
01	(10) NAIC Designation Category 5.A Bonds		0.1230	\$0
01	(11) NAIC Designation Category 5.B Bonds		0.1370	\$0
01	(12) NAIC Designation Category 5.C Bonds		0.1490	\$0
01	(13) Collateral Loans		0.0500	\$0
01	(14) Mortgages		0.0500	\$0
01	(15) NAIC 02 Unaffiliated Preferred Stock		0.0100	\$0
01	(16) NAIC 03 Unaffiliated Preferred Stock		0.0200	\$0
01	(17) NAIC 04 Unaffiliated Preferred Stock		0.0450	\$0
01	(18) NAIC 05 Unaffiliated Preferred Stock		0.1000	\$0
01	(19) Other Long-Term Invested Assets		0.1000	\$0
01	(20) NAIC 02 Working Capital Finance Investments		0.0125	\$0
01	(21) Federal Guaranteed Low Income Housing Tax Credits		0.0014	\$0
01	(22) Federal Non-Guaranteed Low Income Housing Tax Credits		0.0260	\$0
01	(23) State Guaranteed Low Income Housing Tax Credits		0.0014	\$0
01	(24) State Non-Guaranteed Low Income Housing Tax Credits		0.0260	\$0
01	(25) All Other Low Income Housing Tax Credits		0.1500	\$0
01	(26) Unaffiliated Common Stock		0.1500	\$0
01	(27) Total of Issuer = Lines (1) through (26)	\$0		\$0

 Denotes items that must be manually entered on filing software.