# **Capital Adequacy (E) Task Force**

# **RBC Proposal Form**

[ x ] Capital Adequacy (E) T [ ] Catastrophe Risk (E) St [ ] C3 Phase II/ AG43 (E/A	abgroup [ ] Investment RBC (E) Working							
	DATE: 8/11/22	FOR NAIC USE ONLY						
CONTACT PERSON:	Eva Yeung	Agenda Item #_ 2022-09-CA						
TELEPHONE:	816-783-8407	Year <u>2023</u>						
EMAIL ADDRESS:	eyeung@naic.org	DISPOSITION						
ON BEHALF OF:	Capital Adequacy (E) Task Force	[ ] ADOPTED						
NAME:	Tom Botsko	[ ] REJECTED						
TITLE:	Chair	[ ] DEFERRED TO						
AFFILIATION:	Ohio Department of Insurance	[ ] REFERRED TO OTHER NAIC GROUP						
ADDRESS:	50 West Town Street, Suite 300	[ x ] EXPOSED <u>8/11/22</u>						
	Columbus, OH 43215	[ ] OTHER (SPECIFY)						
IDENTIFICATION OF SOURCE AND FORM(S)/INSTRUCTIONS TO BE CHANGED  [x] Health RBC Blanks [x] Property/Casualty RBC Blanks [x] Life and Fraternal RBC Instructions [x] Health RBC Instructions [x] Property/Casualty RBC Instructions [x] Life and Fraternal RBC Blanks [] OTHER								
	DESCRIPTION OF CHANGE(S	5)						
The proposed change would	revise the instructions and structure for the Affiliat	red Investments for all lines.						
	REASON OR JUSTIFICATION FOR CH	HANGE **						
The proposed revisions will improve the risk-based capital formulas and provide consistency to the treatment of affiliates for all lines of business.								
	Additional Staff Comments:							
/11/22 - The Task Force exposed this proposal for a 60-day public comment period ending Oct, 10.								

**Revised 2-2019** 

\*\* This section must be completed on all forms.

# AFFILIATED/SUBSIDIARY STOCKS XR002 – XR004

There are nine categories of affiliated/subsidiary investments that are subject to Risk-Based Capital requirements for common stock and preferred stock holdings. Those nine categories are:

- 1. Directly Owned U.S. Insurance Affiliates/Subsidiaries Subject to a Risk-Based Capital (RBC)-Look-Through Calculation
  - a. Health Insurance Company or Health Entity
  - b. Property and Casualty Insurance Company
  - c. Life Insurance Company
- 2. Indirectly Owned U.S. Insurance Affiliates/Subsidiaries Subject to RBC-Look-Through Calculation
  - a. Health Insurance Company or Health Entity
  - b. Property and Casualty Insurance Company
  - c. Life Insurance Company
- 3. Holding Company Value in Excess of Indirectly Owned Insurance Affiliates/Subsidiaries
- 4. Investment Subsidiaries
- 5. Directly Owned Alien Insurance Affiliates/Subsidiaries
  - a. Health Insurance Company or Health Entity
  - b. Property and Casualty Insurance Company
  - c. Life Insurance Company
- 6. Indirectly Owned Alien Insurance Affiliates/Subsidiaries
  - a. Health Insurance Company or Health Entity
  - b. Property and Casualty Insurance Company
  - c. Life Insurance Company
- 7. Investments in Upstream Affiliate (Parent)
- 8. Directly Owned U.S. Insurance Affiliates/Subsidiaries Not Subject to RBC
  - a. Health Insurance Companies and Health Entities Not Subject to RBC
  - b. Property and Casualty Insurance Companies Not Subject to RBC
  - c. Life Insurance Companies Not Subject to RBC
- 9. Non-Insurance Affiliates/Subsidiaries Not Subject to RBC
  - a. Entities with a capital requirement imposed by a regulatory body
  - b. Other Financial Entities without regulatory capital requirements
  - c. Other Non-financial entities

Enter applicable items for each affiliate/subsidiary in the Details for Affiliated/Subsidiary Stocks worksheet. The program will automatically calculate the risk-based capital charge for each affiliate/subsidiary. When the data is uploaded to the NAIC database, it will be crosschecked, and the company will be required to correct any discrepancies and refile a corrected version with the NAIC and/or any state that requires the company to file RBC with its department. The RBC report will display the number of affiliates/subsidiaries. These numbers should be reviewed to ensure that all affiliates/subsidiaries are appropriately reported.

Line 10 of XR003 – Fair Value Excess Subsidiary Common Stock equals the total of type codes 1.a. through 2.c., Column 13 of the Subsidiary Companies Risk – Details Page. The program will automatically calculate this figure.

The total of all reported affiliate/subsidiary stock should equal the amounts reported on Schedule D, Part 2, Section 1, Line 4409999999 plus Schedule D, Part 2, Section 2, Line 5979999999 and 9399999 and should also equal Schedule D, Part 6, Section 1, Line 0999999 plus Line 18999999.

Affiliated/Subsidiary investments fall primarily into two broad categories: (a) Insurance Affiliates/Subsidiaries that are Subject to risk-based capital; and (b) Affiliates/Subsidiaries that are Not Subject to risk-based capital. The risk-based capital for these two broad groups differs. A third category of Affiliates/Subsidiaries, publicly traded insurance affiliates/subsidiaries held at market value, has characteristics of both broader categories. As a result, it has a two-part RBC calculation. The general treatment for each is explained below.

Directly owned insurance and health entity affiliates/subsidiaries are affiliates/subsidiaries in which the reporting company owns the stock of the affiliate/subsidiary. Indirectly owned insurance affiliate/subsidiaries and health entities are those where the reporting company owns stock in a holding company, which in turn owns the stock of the insurance affiliate/subsidiary or health entity. Note that there could be multiple holding companies that control the downstream insurance company.

Enter the book/adjusted carrying value of: the common stock in Column (5), the preferred stock in Column (9), the total outstanding common stock in Column (7) and the total outstanding preferred stock of that affiliate/subsidiary in Column (10) of the appropriate worksheet. The percentage of ownership is calculated by summing the book/adjusted carrying values of the owned preferred and common stock and dividing that amount by the sum of all outstanding preferred and common stock.

# Insurance Affiliates/Subsidiaries that are Subject to RBC

## 1. <u>Directly Owned U.S. Affiliates/Subsidiaries:</u>

The risk-based capital requirement for the reporting company for those insurance affiliates/subsidiaries that are subject to a risk-based capital requirement is based on the Total Risk-Based Capital After Covariance of the subsidiary, prorated for the percent of ownership of that affiliate/subsidiary.

For purposes of Affiliate/Subsidiary Risk all references to Total Risk-Based Capital After Covariance of the affiliate/subsidiary means:

- a. For a Health affiliate/subsidiary RBC filing, Total Risk-Based Capital After Covariance before Basic Operational Risk (XR025, Line (37)).
- b. For a P/C affiliate/subsidiary RBC filing, Total Risk-Based Capital After Covariance before Basic Operational Risk (PR032, Line (68)).
- c. For a Life affiliate/subsidiary RBC filing, the sum of
  - i. Total Risk-Based Capital After Covariance before Basic Operational Risk (LR031, Line (67); and
  - ii. Primary Security shortfalls for all cessions covered by Actuarial Guideline XLVIII (AG 48) multiplied by two (LR031, Line (71)).

For RBC purposes, the reporting insurer must determine the carrying value and the RBC requirement of a directly owned RBC filing affiliate/subsidiary company, even if the RBC filing affiliate/subsidiary is non-admitted for financial reporting purposes. The value reported in annual statement Schedule D, Part 6, Section 1 will be used for RBC purposes. In addition to RBC, the carrying value of the RBC filer must be reported in total adjusted capital for RBC purposes, in order to appropriately balance the numerator with the addition to the denominator value. Enter the carrying value of the insurer on Line XXX of the Calculation of Total Adjusted Capital page to satisfy these instructions.

Equity method Insurance Affiliates/Subsidiaries: Equity method is defined in SSAP 97, Paragraph 8b. as the underlying audited statutory equity of the respective entity's financial statements, adjusted for any unamortized goodwill as provided for in SSAP No. 68—Business Combinations and Goodwill. For those insurance Affiliates/Subsidiaries of the reporting company that are reported under the equity method, the H<sub>0</sub> charge of the ownership of the common and preferred stock in these Affiliates/Subsidiaries is limited to the lesser of:

- (a) the Total RBC After Covariance of the affiliate/subsidiary times the percentage of ownership, which is the total of common stock and preferred stock; or
- (b) the common and preferred stock book/adjusted carrying value at which the affiliate/subsidiary is carried

Market Value (including discounted market value) Insurance Affiliates/Subsidiaries (See SSAP No. 97, Paragraph 8a.): If the affiliate/subsidiary's common stock is publicly traded and the reporting company carries the affiliate/subsidiary at market value, after any "discount," there are generally two components to the reporting company's RBC generated by the affiliate/subsidiary. The prorated portion is the percentage of ownership of total common and preferred stock. The smaller of the prorated portion of the affiliate/subsidiary's own statutory surplus or the prorated portion of its RBC after covariance is added to the  $H_0$  component of the reporting company. In the normal case, the common and preferred stock book/adjusted carrying value of the affiliate/subsidiary exceeds the prorated portion of the larger of its statutory surplus and its RBC after covariance. In this case, the addition to the  $H_1$  component is the larger of a) 22.5 percent of the affiliate/subsidiary's common and preferred stock book/adjusted carrying value in excess of the prorated portion of the affiliate/subsidiary's statutory surplus. If the affiliate/subsidiary's common and preferred stock book/adjusted carrying value is less than the prorated portion of its RBC after covariance, but greater than the prorated portion of its statutory surplus, 100 percent of the common and preferred stock book/adjusted carrying value in excess of the prorated portion of the affiliate/subsidiary's statutory surplus is added to the reporting company's  $H_1$  component. If the affiliate/subsidiary's common and preferred stock book/adjusted carrying value is less than the prorated portion of the affiliate/subsidiary statutory surplus, there is no addition to the  $H_1$  component.

## 2. Indirectly Owned U.S. Insurance Affiliates/Subsidiaries

For Indirectly Owned U.S. Insurance Affiliates/Subsidiaries, the carrying value and RBC is calculated in the same manner as for directly owned U.S. Insurance Affiliates/Subsidiaries. The RBC for the indirect affiliates/subsidiaries must be calculated prior to completing this RBC report.

SSAP No. 97 provides guidance for the reporting and admittance requirements of SCAs. Accordingly, there may be cases where an indirectly owned RBC filer may not be separately reported in the statutory financial statements (e.g., they are captured within the carrying value of an intermediate holding company). The SSAP No. 97 guidance permits reporting SCAs at the directly owned holding company level or via look-through to the downstream entity (including where the downstream entity is an RBC filer), but an audit of the entity is required for admittance (i.e. if reporting is at the directly owned holding company level, the holding company must be audited). Regardless of whether there is a look-through applied pursuant to Statutory Accounting Principles (SAP) for annual financial statement reporting, for RBC purposes the reporting insurer must "look-through" all intermediate holding and subsidiary companies to determine the carrying value and the RBC requirement of indirectly owned RBC filing affiliate/subsidiary companies. This involves drilling down to the first RBC filing insurance subsidiary and adjusting for percentage ownership of the intermediate entity directly owning the RBC filing affiliate/subsidiary. Both RBC and carrying value of the RBC filer must be reported for RBC purposes, in order to appropriately balance the numerator with the addition to the denominator value. Enter the carrying value of the insurer on Line XXX of the Calculation of Total Adjusted Capital page to satisfy these instructions.

The carrying value for each indirect insurance affiliate/subsidiary is established based on company records using the statutory value of the insurer as reported in the NAIC annual financial statement blank submitted by the affiliate/subsidiary or market value when applicable, and the RBC requirement as determined in its

RBC Report adjusted for the ownership percentages (both the percentage of the indirectly owned RBC filing affiliate/subsidiary that is owned by the directly held downstream holding company and the reporting insurer's ownership percentage in that downstream entity). The value reported by the downstream holding company for the U.S. RBC filing insurer is the same as the statutory value established for the insurer on a look-through basis.

# 3. Holding Company Value in Excess of Indirectly Owned Insurance Affiliates/Subsidiaries

The carrying value of a U.S. Insurance Affiliate/Subsidiary that is subject to RBC is deducted from the value of the directly held holding company or other entity that in turn directly owns the U.S. Insurance Affiliate/Subsidiary that is subject to RBC, based on the value reported for each insurance subsidiary on the downstream immediate holding company or non-insurance owner's balance sheet. That value is prescribed by the NAIC Accounting Practices and Procedures Manual (SSAP No. 97, paragraph 22.a.). A similar exercise is required for each RBC filing insurer and each non-U.S. insurer in order to determine the remaining excess value of the holding company.

The remaining value of the directly held holding company is then subject to a charge that is calculated in accordance with the instructions for Holding Company Value in Excess of Indirectly Owned Insurance Affiliates/Subsidiaries as specified in the RBC formula. If the holding company is not admitted, report the excess carrying value as zero and the corresponding RBC charge will also be zero. If a negative excess value for the downstream holding company results from removing the value of U.S. RBC filing insurers from the downstream holding company's reported value, then the value of that holding company will be floored at zero and the corresponding RBC charge will also be zero.

The following hypothetical Balance Sheet indicates the view of a Holding Company - Holder, Inc. which is 100% owned by MEGA Health Insurance Company (it assumes that the value reported by the downstream holding company for the U.S. RBC filing insurer is the same as the statutory value established for the insurer on a look-through basis):

Balance Sheet								
Holder, Inc.								
	12/31/XX	XXX						
ABC Life Company	10,000,000	Long Term Debt	5,000,000					
XYZ Casualty Company	15,000,000	Other Liabilities	2,000,000					
ANH Health Company	3,000,000							
Other Common Stock	17,000,000	Total Liabilities	7,000,000					
Cash	7,000,000							
Other Assets	5,000,000	Equity	50,000,000					
Total Assets	57,000,000	Total Liabilities & Equity	57,000,000					
	ANH Health Company Other Common Stock Cash Other Assets	Holder,   12/31/XX	Holder, Inc.   12/31/XXXX     ABC Life Company					

The RBC calculation for Holder, Inc.'s value in excess of the indirectly owned insurance affiliates/subsidiaries is as follows:

	Stat. Book	
<b>Company</b>	<u>value</u>	Source:
Holder, Inc. aff/subs subject to RBC	50,000,000	MEGA Health Sch D - Part 6, Section 1
ABC Life Company	10,000,000	Holder, Inc. Stat. balance sheet
XYZ Casualty Company	15,000,000	Holder, Inc. Stat. balance sheet
ANH Health Company	3,000,000	Holder, Inc. Stat. balance sheet
Subtotal	28,000,000	
Holder, Inc. excl. RBC aff/subs	22,000,000	(amount subject to the 30.0% factor for Holding Company Value in Excess of Indirectly Owned Insurance Affiliates/Subsidiaries)

The following table shows the XR002 entries that MEGA Health Insurance Company (which owns 100% owns of Holder, Inc.) would report for the indirectly owned insurance affiliates/subsidiaries under Holder, Inc. This table assumes that Holder, Inc. owns 40%, 50% and 25% of ABC Life, XYZ Casualty, and ANH Health, respectively. The table also assumes that the RBC values shown for these affiliates/subsidiaries at the 100% level are the correct RBC After Covariance but Before Operational Risk.

			XR002 Column						
		4	5	7	8	11	12		
Affiliates/Subsidiaries	Affiliates/Subsidiaries Type	100%	Book Adjusted	Total Value of	Statutory Surplus of	%	RBC		
		RBC	Carrying Value	Affiliates/Subsidiaries	Affiliates/Subsidiaries	Owned	Required		
ABC Life Company	Indirect U.S. Life Aff/Sub	5,000,000	10,000,000	25,000,000	25,000,000	40%	2,000,000		
XYZ Casualty Company	Indirect U.S. P&C Aff/Sub	12,000,000	15,000,000	30,000,000	30,000,000	50%	6,000,000		
ANH Health Company	Indirect U.S. Health Aff/Sub	6,000,000	3,000,000	12,000,000	12,000,000	25%	1,500,000		

The risk-based capital charge for the parent insurer preparing the calculation is a 30 percent charge against the holding company value in excess of the indirectly owned insurance affiliates/subsidiaries as calculated in the prior example. Enter information in the appropriate columns of the worksheet, omitting those columns that do not apply (Column (3) – NAIC Company Code or Alien ID Number and Column (4) Affiliate's RBC After Covariance).

# Affiliates/Subsidiaries that are Not Subject to RBC

#### 4. Investment Subsidiaries

An investment subsidiary is a subsidiary that exists only to invest the funds of the parent company. The term investment subsidiary is defined in the annual statement instructions as any subsidiary, other than a holding company, engaged or organized primarily to engage in the ownership and management of investments for the insurer. An investment subsidiary shall not include any broker-dealer or a money management fund managing funds other than those of the parent company. The risk-based capital for an investment in an investment subsidiary is 30 percent of the carrying value of the common and preferred stock.

#### 5. <u>Directly Owned Alien Insurance Affiliates/Subsidiaries</u>

For purposes of this formula, the Risk-Based Capital (RBC) of each directly owned alien insurance affiliate/subsidiary is the annual statement book adjusted carrying value of the reporting company's interest in the affiliate multiplied by 1.000. Enter information for any non-U.S. insurance affiliate/subsidiary: life, property and casualty, and health insurers.

For each affiliate/subsidiary, enter the following information:

- Company Name,
- Alien Insurer Identification Number.
- Book Adjusted carrying value of common and preferred stock,
- Total Outstanding value of common and preferred stock,
- Book/adjusted carrying value of the common and preferred stock from Schedule D, Part 6, Section 1, Line 1499999. If no value is reported in the Total Value of Affiliate's common and preferred stock columns (7) and (10), the program will assume 100 percent ownership.

# 6. Indirectly Owned Alien Insurance Affiliates/Subsidiaries

For Indirectly Owned Alien Insurance Affiliates/Subsidiaries, the carrying value and RBC charge is calculated in a similar manner as for directly owned Alien Insurance Affiliates/Subsidiaries.

SSAP No. 97 provides guidance for the reporting and admittance requirements of SCAs. Accordingly, there may be cases where an indirectly owned Alien insurer may not be separately reported in the statutory financial statements (e.g., they are captured within the carrying value of an intermediate holding company). The SSAP No. 97 guidance permits reporting SCAs at the directly owned holding company level or via look-through to the downstream entity (including where the downstream entity is an Alien insurer), but an audit of the entity is required for admittance (i.e. if reporting is at the directly owned holding company level, the holding company must be audited, if the reporting is on a look-through basis then the downstream entity must be audited). Regardless of whether there is a look-through applied pursuant to Statutory Accounting Principles (SAP) for annual financial statement reporting, for RBC purposes the reporting insurer must "look-through" all intermediate holding and subsidiary companies to determine the carrying value and the RBC charge that would be imposed had the Alien insurance affiliate/subsidiary companies been directly held by the reporting insurer. This involves looking down to the first alien insurer affiliate/subsidiary, unless there is an RBC filer in between, and adjusting for percentage ownership of the intermediate entity directly owning the RBC filing affiliate/subsidiary. Both the RBC charge and carrying value of the alien insurer must be reported for RBC purposes, in order to appropriately balance the numerator with the addition to the denominator value. Enter the carrying value of the insurer on Line XXX of the Calculation of Total Adjusted Capital page to satisfy these instructions.

The carrying value of an alien insurance affiliate/subsidiary is deducted from the value of the directly held holding company or other entity that in turn directly owns the U.S. Insurance Affiliate/Subsidiary that is subject to RBC, based on the value reported for each insurance subsidiary on the downstream immediate holding company or non-insurance owner's balance sheet. That value is prescribed by the NAIC Accounting Practices and Procedures Manual (SSAP No. 97, paragraph 22.a.). A similar exercise is required for each RBC filing insurer and each non-U.S. insurer in order to determine the remaining excess value of the holding company.

The RBC charge to be applied to each indirectly owned alien insurance affiliate/subsidiary is the annual statement book adjusted carrying value of the reporting company's interest in the affiliate/subsidiary multiplied by 1.0 and adjusted to reflect the reporting company's ownership on the holding company. For example, assume NEWBIE Insurance Company acquired 100 percent shares of Holder (a holding company), and Holder owns an Alien Insurance Company, which represents 50 percent of the book adjusted carrying value of Holder. If Holder has a book adjusted carrying value of \$20,000,000, NEWBIE Insurance Company would enter \$10,000,000 (1/2 of \$20,000,000) as the carrying value of the Alien Insurance Company and the RBC charge for the indirect ownership of the alien insurance affiliate/subsidiary would be \$5,000,000 (0.500 times \$10,000,000). The risk-based capital charge for the parent insurer preparing the calculation is a 30 percent charge against the holding company value in excess of the indirectly owned insurance affiliates/subsidiaries.

If NEWBIE Insurance Company only acquired 50 percent shares of Holder, NEWBIE Insurance Company would enter \$5,000,000 (50 percent of 1/2 of \$20,000,000) as the carrying value of the Alien Insurance Company and the RBC charge for the indirect ownership of the Alien insurance affiliate/subsidiary would be \$5,000,000 (1.0 times \$5,000,000). Enter information for any indirectly owned alien insurance subsidiaries.

			XR002 Column				
		4	5	7	11	12	
Affiliate/Subsidiary	Affiliate/Subsidiary	100% RBC	Book Adjusted	Total Value of	% Owned	RBC Required	
	Type		Carrying Value	Affiliate/Subsidiary			
Alien Insurance	Indirect Alien Life	5,000,000	10,000,000	20,000,000	50%	5,000,000	
Company	Affiliate/Subsidiary						

For each affiliate/subsidiary enter the following information:

- Company Name,
- Alien Insurer Identification Number,
- Book Adjusted carrying value of common and preferred stock,
- Total Outstanding value of common and preferred stock,
- Book/adjusted carrying value of the common and preferred stock from Schedule D, Part 6, Section 1, Line 1499999. If no value is reported in the Total Value of Affiliate's Common and preferred stock column.

## 7. <u>Investment in Upstream Affiliate (Parent)</u>

The risk-based capital (RBC) for an investment in an upstream parent is 30.0 percent of the book/adjusted carrying value of the common and preferred stock, regardless of whether that upstream parent is subject to RBC. Report the appropriate information from Schedule D, Part 6, Section 1, Lines 0199999 and 1099999 in Columns (1) through (10).

For each affiliate, enter the following information:

- Company Name,
- Affiliate Type Code,
- NAIC Company Code,
- Book Adjusted carrying value of common stock
- Book Adjusted carrying value of preferred stock,
- Total Outstanding value of common and preferred stock.

#### 8. Directly Owned U.S. Insurance Affiliates/Subsidiaries Not Subject to RBC

- a. Health Insurance Companies and Health Entities Not Subject to RBC
- b. Property and Casualty Insurance Companies Not Subject to RBC, such as title insurers, monoline financial guaranty insurers, and monoline mortgage guarantee insurers
- c. Life Insurance Companies Not Subject to RBC, such as life insurance subsidiary exempted from RBC

The risk-based capital for insurers not subject to RBC is based on the underlying statute, regulation, or rule governing capital requirements for such entities. If not otherwise specified by statute regulation or rule, the risk-based capital for an investment in a U.S. insurer that is not required to file an RBC formula is 30 percent of the book/adjusted carrying value of the common and preferred stock.

## 9. Non-Insurance Affiliates/Subsidiaries Not Subject to RBC

- a. Financial entities with a capital requirement imposed by a regulatory body (e.g., a bank)
- b. Other financial entities without regulatory capital requirements
- c. Other non-financial entities

The risk-based capital for entity types a, b, and c is 30 percent of the book/adjusted carrying value of the common and preferred stock. The affiliate/subsidiary code for Non-Insurer Affiliates/Subsidiaries Not Subject to RBC is "9". Reported amounts use Schedule D, Part 6, Section 1, Line 0899999, and Line 1799999 as the basis of reporting.

# APPENDIX 3 – EXAMPLE USED FOR AFFILIATED/SUBSIDIARY STOCKS

To determine the value of total outstanding common stock or total outstanding preferred stock, divide the book/adjusted carrying value of the investment (found in Schedule D - Part 6 Section 1, Column 9) by the percentage of ownership (found in Schedule D - Part 6 - Section 1, Column 12). For example:

Subsidiary Insurance Company	Owner's Book / Adjusted Carrying Value	Percentage Ownership	Total Stock Outstanding
Subsidiary #1	\$1,000,000	100%	\$1,000,000
Subsidiary #2	\$1,000,000	75%	\$1,333,333
Subsidiary #3	\$1,000,000	50%	\$2,000,000
Subsidiary #4	\$1,000,000	25%	\$4,000,000
Subsidiary #5	\$1,000,000	10%	\$10,000,000

## AFFILIATED COMPANIES RISK - DETAILS

#### DETAILS FOR AFFILIATED STOCKS

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
	(1)	(2)	(3)	(4)	(3)	(0)	(7)	(6)	(2)	(10)	(11)	(12)	(13)
			27.70	Affiliate's RBC after	B 1/1/11 . 1				5 1/12 1				
			NAIC	Covariance Before	Book/Adjusted	Valuation Basis of Col (5)	T . 137.1 C	T . 1 C	Book/Adjusted	T . 137.1 C	Percent		Market Value Excess Component Affiliated
			Company Code or	Basic Operational Risk	Carrying Value (statement value) of		Total Value of Affiliate's	Total-Statutory Surplus of Affiliate Subject to	Carrying Value (statement value)	Total Value of Affiliate's	Owned $(Cols 5 + 9)$		Component Affiliated Common Stock RBC
		Affil Type	Alien ID	XR025 Line (37) PR032 Line (67)	Affiliate's Common		Outstanding	RBC (Adjusted for %	of Affiliate's	Outstanding	/ (Cols 7 +	RBC Required	Required
	Name of Affiliate	Code	Number	LR031 Line (67) + (71)	Stock	A - All Other	Common Stock	Owned)	Preferred Stock	Preferred Stock	10)	(H0 Compoenent)	(H1 Component)
(01)				(, (. )				)			100.000%	()	(*** - ****, ***************************
(02)											100.000%		
(03)											100.000%		
(04)											100.000%		
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(46)											100.000%		
(47)											100.000%		
(48)											100.000%		
(49)											100.000%		
(50)											100.000%		
(9999999)	Total	XXX	XXX	0	0	XXX	0	0	0	0	XXX	0	0

Indirectly owned insurance affiliate not subject to RBC will be included Category 4

If Col (2) < 5 and Col (6) = F Do Calculation

#### **Calculation**

 $\frac{\text{Col } (12) = \text{Min } [\text{Col } (4) \times \text{Col } (11), \text{Col } (8) \times \text{Col } (11)]}{\text{Col } (12) = \text{Min } [\text{Col } (4) \times \text{Col } (11), \text{Col } (8) \times \text{Col } (11)]}$ 

If Col (5) + Col (9) > Max [Col (4) x Col (11), Col (8) x Col (11)] then

 $\frac{\text{Col } (13) = \text{Max} \{ [\text{Col } (5) + \text{Col } (9) - \text{Col } (8) \times \text{Col } (11) ] \times .225, [\text{Col } (4) - \text{Col } (8)] \times \text{Col } (11) \}}{\text{Col } (13) = \text{Max} \{ [\text{Col } (5) + \text{Col } (9) - \text{Col } (8) \times \text{Col } (11) ] \times .225, [\text{Col } (4) - \text{Col } (8)] \times \text{Col } (11) \}}$ 

If  $Col(4) \times Col(11) > Col(5) + Col(9) > Col(8) \times Col(11)$  then

 $Col(13) = Col(5) + Col(9) - Col(8) \times Col(11)$ 

Otherwise

 $\frac{\text{Col}(13) = 0}{}$ 

Col (12) and (13) cannot be less than 0

# SUBSIDIARY, CONTROLLED AND AFFILIATED INVESTMENTS AFFILIATED COMPANIES RISK

				(1)	(2)
	Type of Affiliate Affiliate Type	Type Code	Basis	Number of Companies	Total RBC Required
(1)	<b>Directly Owned Health Insurance Companies or Health Entities</b>	1a	Affiliate's RBC* Sub's RBC After Covariance	0	\$0
(2)	Directly Owned Property and Casualty Insurance Affiliates	1b	Affiliate's RBC* Sub's RBC After Covariance	0	\$0
(3)	Directly Owned Life Insurance Affiliates	1c	Affiliate's RBC* Sub's RBC After Covariance	0	\$0
(4)	Indirectly Owned Health Insurance Companies or Health Entities	2a	Affiliate's RBC* Sub's RBC After Covariance	0	\$0
(5)	Indirectly Owned Property and Casualty Insurance Affiliates	2b	Sub's RBC After Covariance	0	\$0
(6)	Indirectly Owned Life Insurance Affiliates	2c	Sub's RBC After Covariance	0	\$0
(7)	Holding Company in Excess of Indirect Subs	3	0.300	0	\$0
(8)	Investment Subsidiary	4	0.300	0	\$0
(9)	<b>Directly Owned Alien Health Insurance Companies or Health Entities</b>	5a	1.000	0	\$0
(10)	Directly Owned Alien Property and Casualty Insurance Affiliates	5b	1.000	0	\$0
(11)	Directly Owned Alien Life Insurance Affiliates	5c	1.000	0	\$0
(12)	Indirectly Owned Alien Health Insurance Companies or Health Entities	6a	1.000	0	\$0
(13)	Indirectly Owned Alien Property and Casualty Insurance Affiliates	6b	1.000	0	\$0
(14)	Indirectly Owned Alien Life Insurance Affiliates	6c	1.000	0	\$0
(15)	Investment in Upstream Affiliate (Parent)	7	0.300	0	\$0
(16)	Directly Owned Health Insurance Companies or Health Entities Not Subject to RBC	8a	0.300	0	\$0
(17)	Directly Owned Property and Casualty Insurance Companies Not Subject to RBC	8b	0.300	0	\$0
(18)	Directly Owned Life Insurance Companies Not Subject to RBC	8c	0.300	0	\$0
(19)	Non-Insurance Entities with a Capital Equirement Imposed by a Eegulatory Body	9a	0.300	0	\$0
(20)	Non-Insurance Other Financial Entities without Regulatory Capital Requirements	9b	0.300	0	\$0
(21)	Other Non-financial Entites	9c	0.300	0	\$0
(22)	Total			0	\$0

# **CROSSCHECKING FOR AFFILIATED INVESTMENTS**

# SUMMARY FOR SUBSIDIARY, CONTROLLED AND AFFILIATED INVESTMENTS FOR CROSS-CHECKING STATEMENT VALUES

	Affiliated Preferred Stock Schedule D Part 6 Section 1 C7	Annual Statement Line Number	(1) <u>Total</u> Preferred Stock	(2) <u>Total From RBC</u> <u>Report</u>	(3) Difference
(1)	Parent	0199999	0		0
(2)	U.S. P&C Insurer	0299999	0		0
(3)	U.S. Life Insurer	0399999	0		0
(4)	U.S. Health Insurer	0499999	0		0
(5)	Alien Insurer	0599999	0		0
(6)	Non-Insurer Which Controls Insurer	0699999	0		0
(7)	Investment Subsidiary	0799999	0		0
(8)	Other Affiliates	0899999			0
(9)	Subtotal	0999999	0	0	0

	Affiliated Common Stock	Annual Statement	(1) Total	(2) Total From RBC	(3)
	Schedule D Part 6 Section 1 C7	Line Number	Common Stock	<u>Report</u>	<u>Difference</u>
Lan	<b>D</b>	1000000			
(10)	Parent	1099999			0
(11)	U.S. P&C Insurer	1199999			0
(12)	U.S. Life Insurer	1299999			0
(13)	U.S.Health Insurer	1399999			0
(14)	Alien Insurer	1499999			0
(15)	Non-Insurer Which Controls Insurer	1599999			0
(16)	Investment Subsidiary	1699999			0
(17)	Other Affiliates	1799999			0
(18)	Subtotal	1899999	0	0	0

# **EQUITY ASSETS**

2011			(1)		(2)
		Annual Statement Source	Bk/Adj Carrying Value	<u>Factor</u>	RBC Requirement
PREFERF	RED STOCK - UNAFFILIATED				
(1)	NAIC 01 Preferred Stock	Included in Schedule D, Part 2, Section 1		0.003	\$0
(2)	NAIC 02 Preferred Stock	Included in Schedule D, Part 2, Section 1		0.010	\$0
(3)	NAIC 03 Preferred Stock	Included in Schedule D, Part 2, Section 1		0.020	\$0
(4)	NAIC 04 Preferred Stock	Included in Schedule D, Part 2, Section 1		0.045	\$0
(5)	NAIC 05 Preferred Stock	Included in Schedule D, Part 2, Section 1		0.100	\$0
(6)	NAIC 06 Preferred Stock	Included in Schedule D, Part 2, Section 1		0.300	\$0
(7)	Total - Unaffiliated Preferred Stock	Sum of Lines (1) through (6)	\$0		\$0
	(Should equal Page 2, Column 3, Line 2.1 less Sch D Sum, Col	umn 1, Line 18)			
GO) B (O)	NOTE OVER A DEPARTMENT OF THE PARTMENT OF THE				
	N STOCK - UNAFFILIATED				
(8)	Federal Home Loan Bank Stock	Company Records		0.023	\$0
(9)	Total Common Stock	Schedule D, Summary, Column 1, Line 25			
(10)	Affiliated Common Stock	Schedule D, Summary, Column 1, Line 24			
(11)	Other Unaffiliated Common Stock	Lines (9) - (8) - (10)	\$0	0.150	\$0
(12)	Market Value Excess Affiliated Common Stock	XR002 C(13) L(9999999)	· · · · · · · · · · · · · · · · · · ·		\$0
(13)	Total Unaffiliated Common Stock	Lines $(8) + (11) + (12)$	\$0		\$0

# CALCULATION OF TOTAL RISK-BASED CAPITAL AFTER COVARIANCE

			(1)
			RBC Amount
H0 - INSU	URANCE AFFILIATES AND MISC. OTHER AMOUNTS		
(1)	Off-Balance Sheet Items	XR005, Off-Balance Sheet Page, Line (21)	\$0
(2)	Directly Owned Health Insurance Companies or Health Entities	XR003, Affiliates Page, Column (2), Line (1)	\$0
(3)	Directly Owned Property and Casualty Insurance Affiliates	XR003, Affiliates Page, Column (2), Line (2)	\$0
(4)	Directly Owned Life Insurance Affiliates	XR003, Affiliates Page, Column (2), Line (3)	\$0
(5)	<b>Indirectly Owned Health Insurance Companies or Health Entities</b>	XR003, Affiliates Page, Column (2), Line (4)	\$0
(6)	Indirectly Owned Property and Casualty Insurance Affiliates	XR003, Affiliates Page, Column (2), Line (5)	\$0
<b>(7)</b>	Indirectly Owned Life Insurance Affiliates	XR003, Affiliates Page, Column (2), Line (6)	\$0
(8)	Affiliated Alien Insurers - Directly Owned	XR003, Affiliates Page, Column 2, Line (9) + (10) + (11)	\$0
(9)	Affiliated Alien Insurers - Indirectly Owned	XR003, Affiliates Page, Column 2, Line (12) + (13) + (14)	\$0
(10)	Total H0	Sum Lines (1) through (9)	\$0
		<del>-</del>	
H1 - ASS	ET RISK - OTHER		
<del>(11)</del>	Investment Affiliates	XR003, Affiliates Page, Line (5)	<del>\$0</del>
<del>(12)</del>	Holding Company Excess of Subsidiaries	XR003, Affiliates Page, Line (6)	<del>\$0</del>
<del>(13)</del>	Investment in Parent	XR003, Affiliates Page, Line (9)	<del>\$0</del>
<del>(14)</del>	Other Affiliates	XR003, Affiliates Page, Line (10)	<del>\$0</del>
<del>(15)</del>	Fair Value Excess Affiliate Common Stock	XR003, Affiliates Page, Line (11)	<del>\$0</del>
(11)	Holding Company in Excess of Indirect Subs	XR003, Affiliates Page, Column (2), Line (7)	\$0
(12)	Investment Subsidiary	XR003, Affiliates Page, Column (2), Line (8)	\$0
(13)	Investment in Upstream Affiliate (Parent)	XR003, Affiliates Page, Column (2), Line (15)	\$0
(14)	Directly Owned Health Insurance Companies or Health Entities N	(XR003, Affiliates Page, Column (2), Line (16)	\$0
(15)	<b>Directly Owned Property and Casualty Insurance Companies Not</b>	SXR003, Affiliates Page, Column (2), Line (17)	\$0
(16)	Directly Owned Life Insurance Companies Not Subject to RBC	XR003, Affiliates Page, Column (2), Line (18)	\$0
(17)	Affiliated Non-Insurer	XR003, Affiliates Page, Column 2, Line (19) + (20) + (21)	\$0
	Fixed Income Assets	XR006, Off-Balance Sheet Collateral, Lines (27) + (37) + (38) +	
(18)		(39) + XR008, Fixed Income Assets Page Line (51)	\$0
(19)	Replication & Mandatory Convertible Securities	XR009, Replication/MCS Page, Line (9999999)	\$0
	Unaffiliated Preferred Stock	XR006, Off-Balance Sheet Collateral, Line (34) + XR010, Equity	
(20)	TI MILL IN CO. I	Assets Page, Line (7)	\$0
(21)	Unaffiliated Common Stock	XR006, Off-Balance Sheet Collateral, Line (35) + XR010, Equity Assets Page, Line (13)	60
(21)	Property & Equipment	XR006, Off-Balance Sheet Collateral, Line (36) + XR011,	\$0
(22)	Toperty & Equipment	Prop/Equip Assets Page, Line (9)	\$0
(23)	Asset Concentration	XR012, Grand Total Asset Concentration Page, Line (27)	\$0
(24)	Total H1	Sum Lines (11) through (23)	\$0
(= .)	1000.111	=	
H2 - UND	DERWRITING RISK		
(25)	Net Underwriting Risk	XR013, Underwriting Risk Page, Line (21)	\$0
(26)	Other Underwriting Risk	XR015, Underwriting Risk Page, Line (25.3)	\$0
(27)	Disability Income	XR015, Underwriting Risk Page, Lines (26.3) + (27.3) + (28.3)	\$0
(=/)	Distance of the control of the contr	+ (29.3) + (30.6) + (31.3) + (32.3)	
(28)	Long-Term Care	XR016, Underwriting Risk Page, Line (41)	\$0
(29)	Limited Benefit Plans	XR017, Underwriting Risk Page, Lines (42.2) + (43.6) + (44)	\$0
(30)	Premium Stabilization Reserve	XR017, Underwriting Risk Page, Line (45)	\$0
(31)	Total H2	Sum Lines (25) through (30)	\$0
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CALCU	(1)		
			RBC Amount
H3 - CRE	EDIT RISK		
(32)	Total Reinsurance RBC	XR020, Credit Risk Page, Line (17)	\$0
(33)	Intermediaries Credit Risk RBC	XR020, Credit Risk Page, Line (24)	\$0
(34)	Total Other Receivables RBC	XR021, Credit Risk Page, Line (30)	\$0
(35)	Total H3	Sum Lines (32) through (34)	\$0
H4 - BUS	INESS RISK		
(36)	Administrative Expense RBC	XR022, Business Risk Page, Line (7)	\$0
(37)	Non-Underwritten and Limited Risk Business RBC	XR022, Business Risk Page, Line (11)	\$0
(38)	Premiums Subject to Guaranty Fund Assessments	XR022, Business Risk Page, Line (12)	\$0
(39)	Excessive Growth RBC	XR022, Business Risk Page, Line (19)	\$0
(40)	Total H4	Sum Lines (36) through (39)	\$0
(41)	RBC after Covariance Before Basic Operational Risk	$H0 + Square Root of (H1^2 + H2^2 + H3^2 + H4^2)$	\$0
(42)	Basic Operational Risk	0.030 x Line (41)	\$0
(43)	C-4a of U.S. Life Insurance Subsidiaries	Company Records	
(44)	Net Basic Operational Risk	Line (42) - (43) (Not less than zero)	\$0
(45)	RBC After Covariance Including Basic Operational Risk	Lines (41) + (44)	\$0
(46)	Authorized Control Level RBC	.50 x Line (45)	\$0

# CALCULATION OF TOTAL ADJUSTED CAPITAL

CILLO			(1)		(2)
		Annual Statement Source	Amount	Factor	Adjusted Capital
Company	Amounts				•
(1)	Capital and Surplus	Page 3, Column 3, Line 33		1.000	\$0
Subsidia	ry Adjustments				
(2)	AVR - Life Subs	Affiliate's Statement §		1.000	\$0
(3)	Dividend Liability - Life Subsidiaries	Affiliate's Statement		0.500	\$0
(4)	Tabular Discounts - P&C Subsidiaries	Affiliate's Statement		-1.000	\$0
(5)	Non-Tabular Discounts - P&C Subsidiaries	Affiliate's Statement		-1.000	\$0
(6)	Carrying Value of Non-Admitted Insurance Affiliates	Included in XR002 Column 5 and Column 9	0	1.000	\$0
(7)	Total Adjusted Capital, Post-Deferred Tax			=	\$0
SENSITI	VITY TEST:				
(8)	DTA Value for Company	Page 2, Column 3, Line 18.2		1.000	\$0
(9)	DTL Value for Company	Page 3, Column 3, Line 10.2		1.000	\$0
(10)	DTA Value for Insurance Subsidiaries	Company Records		1.000	\$0
(11)	DTL Value for Insurance Subsidiaries	Company Records		1.000	\$0
(12)	Total Adjusted Capital, Pre-Deferred Tax (Sensitivity)	Lines (7) - (8) + (9) - (10) + (11)		=	\$0
Ex DTA	ACL RBC Ratio Sensitivity Test				
(13)	Deferred Tax Asset	Page 2 Column 3, Line 18.2		1.000	\$0
(14)	Total Adjusted Capital Less Deferred Tax Asset	Lines (7) less (13)		=	\$0
(15)	Authorized Control Level RBC	XR027 Comparison of Total Adjusted Capital	o Risk-Based Capital Lin	ie (4)	\$0
(16)	Ex DTA ACL RBC Ratio	Line (14)/(15)			0.000%

The portion of the AVR that can be counted as capital is limited to the amount not utilized in asset adequacy testing in support of the Actuarial Opinion for reserves.

# AFFILIATED/SUBSIDIARY STOCKS LR042 – LR044

There are ten categories of affiliated/subsidiary investments that are subject to Risk-Based Capital requirements for common stock and preferred stock holdings. Those ten categories are:

- 1. Directly Owned U.S. Insurance Affiliates/Subsidiaries Subject to a Risk-Based Capital (RBC)-Look-Through Calculation
  - a. Health Insurance Company or Health Entity
  - b. Property and Casualty Insurance Company
  - c. Life Insurance Company
- 2. Indirectly Owned U.S. Insurance Affiliates/Subsidiaries Subject to RBC-Look-Through Calculation
  - a. Health Insurance Company or Health Entity
  - b. Property and Casualty Insurance Company
  - c. Life Insurance Company
- 3. Holding Company Value in Excess of Indirectly Owned Insurance Affiliates/Subsidiaries
- 4. Investment Subsidiaries
- 5. Directly Owned Alien Insurance Affiliates/Subsidiaries
  - a. Health Insurance Company or Health Entity
  - b. Property and Casualty Insurance Company
  - c. Life Insurance Company
- 6. Indirectly Owned Alien Insurance Affiliates/Subsidiaries
  - a. Health Insurance Company or Health Entity
  - b. Property and Casualty Insurance Company
  - c. Life Insurance Company
- 7. Investments in Upstream Affiliate (Parent)
- 8. Directly Owned U.S. Insurance Affiliates/Subsidiaries Not Subject to RBC
  - a. Health Insurance Companies and Health Entities Not Subject to RBC
  - b. Property and Casualty Insurance Companies Not Subject to RBC
  - c. Life Insurance Companies Not Subject to RBC
- 9. Non-Insurance Affiliates/Subsidiaries Not Subject to RBC
  - a. Entities with a capital requirement imposed by a regulatory body
  - b. Other Financial Entities without regulatory capital requirements
  - c. Non-financial entities
- 10. Publicly Traded Insurance Affiliates/Subsidiaries Held at Market Value

Enter applicable items for each affiliate/subsidiary in the Details for Affiliated/Subsidiary Stocks worksheet. The program will automatically calculate the risk-based capital charge for each affiliate/subsidiary. When the data is uploaded to the NAIC database, it will be cross-checked and the company will be required to correct any discrepancies and refile a corrected version with the NAIC and/or any state that requires the company to file RBC with its department. The RBC report will display the number of affiliates/subsidiaries. These numbers should be reviewed to ensure that all affiliates/subsidiaries are appropriately reported.

The total of all reported affiliate/subsidiary stock should equal the amounts reported on Schedule D, Part 2, Section 1, Line 4409999999 plus Schedule D, Part 2, Section 2, Line 5979999999 and should also equal Schedule D, Part 6, Section 1, Line 0999999 plus Line 18999999.

Affiliated/Subsidiary investments fall into two broad categories: (A) Insurance Affiliates/Subsidiaries that are Subject to risk-based capital; and (B) Affiliates/Subsidiaries that are Not Subject to risk-based capital. The risk-based capital for these two broad groups differs. Investment subsidiaries are a subset of category A in that they are subject to a risk-based capital charge that includes the life RBC risk factors applied only to the investments held by the investment subsidiary for its parent insurer. Publicly traded insurance affiliates/subsidiaries held at market value have characteristics of both broader categories. As a result, there is a two-part RBC calculation. The general treatment for each is explained below.

Directly owned insurance and health entity affiliates/subsidiaries are affiliates/subsidiaries in which the reporting company owns the stock of the affiliate/subsidiary. Indirectly owned insurance affiliates/subsidiaries and health entities are those where the reporting company owns stock in a holding company, which in turn owns the stock of the insurance affiliate/subsidiary or health entity. Note that there could be multiple holding companies that control the downstream insurance company.

Enter the book/adjusted carrying value of: the common stock in Column (5), the preferred stock in Column (7), the total outstanding common stock in Column (6) and the total outstanding preferred stock of that affiliate/subsidiary in Column (10) of the appropriate worksheet. The percentage of ownership is calculated by summing the book/adjusted carrying values of the owned preferred stock and common stock and dividing that amount by the sum of all outstanding preferred and common stock.

## Insurance Affiliate/Subsidiaries that are Subject to RBC

#### 1. Directly Owned U.S. Affiliates/Subsidiaries:

The risk-based capital requirement for the reporting company for those insurance affiliates/subsidiaries that are subject to a risk-based capital requirement is based on the Total Risk-Based Capital After Covariance of the affiliate/subsidiary, prorated for the percent of ownership of that affiliate/subsidiary.

For purposes of Subsidiary Risk all references to Total Risk-Based Capital After Covariance of the affiliate/subsidiary means:

- a. For a Health affiliate/subsidiary RBC filing, Total Risk-Based Capital After Covariance before Basic Operational Risk (XR024, Line (37));
- b. For a P/C affiliate/subsidiary RBC filing, Total Risk-Based Capital After Covariance before Basic Operational Risk (PR032, Line (68)); and
- c. For a Life affiliate/subsidiary RBC filing, the sum of
  - (a) Total Risk-Based Capital After Covariance before Basic Operational Risk (LR031, Line (67); and
  - (b) Primary Security shortfalls for all cessions covered by Actuarial Guideline XLVIII (AG 48) multiplied by two (LR031, Line (71)).

For RBC purposes, the reporting insurer must determine the carrying value and the RBC requirement of directly owned RBC filing affiliate/subsidiary company, even if the RBC filing affiliate/subsidiary is non-admitted. The value reported in annual statement Schedule D, Part 6, Section 1 should be used for RBC purposes. In addition to RBC, the carrying value of the RBC filer must be reported in total adjusted carrying value for RBC purposes, in order to appropriately balance the numerator with the addition of the denominator value. Enter the carrying value of the insurer on Line XXX of the Calculation of Total Adjusted Capital page to satisfy these instructions.

**Equity method Insurance Affiliates/Subsidiaries:** Equity method is defined in SSAP No. 97, Paragraph 8b. as the underlying audited statutory equity of the respective entity's financial statements, adjusted for any unamortized goodwill as provided for in SSAP No. 68—Business Combinations and Goodwill. For those insurance Affiliates/Subsidiaries of the reporting company that are reported under the equity method, the C<sub>0</sub> charge of the ownership of the common and preferred stock in these Affiliates/Subsidiaries is limited to the lesser of:

- (a) the Total RBC After Covariance of the affiliate/subsidiary times the percentage of ownership, which is the total of common stock and preferred stock; or
- (b) the common and preferred stock book/adjusted carrying value at which the affiliate/subsidiary is carried.

Market Value (including discounted market value) Insurance Affiliates/Subsidiaries (See SSAP No. 97, Paragraph 8a.): See 10 below.

#### 2. Indirectly Owned U.S. Insurance Affiliates/Subsidiaries

For Indirectly Owned U.S. Insurance Affiliates/Subsidiaries, the carrying value and RBC is calculated in the same manner as for directly owned U.S. Insurance Affiliates/Subsidiaries. The RBC for the indirect affiliates/subsidiaries must be calculated prior to completing this RBC report.

SSAP No. 97 provides guidance for the reporting and admittance requirements of SCAs. Accordingly, there may be cases where an indirectly owned RBC filer may not be separately reported in the statutory financial statements (e.g., they are captured within the carrying value of an intermediate holding company). The SSAP No. 97 guidance permits reporting SCAs at the directly owned holding company level or via look-through to the downstream entity (including where the downstream entity is an RBC filer), but an audit of the entity is required for admittance (i.e. if reporting is at the directly owned holding company level, the holding company must be audited, if the reporting is on a look-through basis then the downstream entity must be audited). Regardless of whether there is a look-through applied pursuant to Statutory Accounting Principles (SAP) for annual financial statement reporting, for RBC purposes the reporting insurer must "look-through" all intermediate holding and subsidiary companies to determine the carrying value and the RBC requirement of indirectly owned RBC filing affiliate/subsidiary company. This involves drilling down to the first RBC filing insurance affiliate/subsidiary and adjusting for percentage ownership of the intermediate entity directly owning the RBC filing affiliate/subsidiary. Both RBC and carrying value of the RBC filer must be reported for RBC purposes, in order to appropriately balance the numerator with the addition to the denominator value. Enter the carrying value of the insurer on Line XXX of the Calculation of Total Adjusted Capital page to satisfy these instructions.

The carrying value for each indirect insurance affiliate/subsidiary is established based on company records using the statutory value of the insurer as reported in the NAIC annual financial statement blank submitted by the affiliate/subsidiary or market value when applicable, and the RBC requirement as determined in its RBC Report adjusted for the ownership percentages (both the percentage of the indirectly owned RBC filing affiliate/subsidiary that is owned by the directly held downstream holding company and the reporting insurer's ownership percentage in that downstream entity). The value reported by the downstream holding company for the U.S. RBC filing insurer is the same as the statutory value established for the insurer on a look-through basis.

#### 3. Holding Company Value in Excess of Indirectly Owned Insurance Affiliates/Subsidiaries:

The carrying value of a U.S. Insurance Affiliate/Subsidiary that is subject to RBC is deducted from the value of the directly held holding company or other entity that in turn directly owns the U.S. Insurance Affiliate/Subsidiary that is subject to RBC, based on the value reported for each insurance affiliate/subsidiary on the downstream immediate holding company or non-insurance owner's balance sheet. That value is prescribed by the NAIC Accounting Practices and Procedures Manual (SSAP No. 97, paragraph 22.a.). A similar exercise is required for each RBC filing insurer and each non-U.S. insurer in order to determine the remaining excess value of the holding company.

The remaining value of the directly held holding company is then subject to a charge that is calculated in accordance with the instructions for Holding Company Value in Excess of Indirectly Owned Insurance Affiliates/Subsidiaries as specified in the RBC formula. If the holding company is not admitted, report the excess carrying value as zero and the

corresponding RBC charge will also be zero. If a negative excess value for the downstream holding company results from removing the value of U.S. RBC filing insurers from the downstream holding company's reported value, then the value of that holding company will be floored at zero and the corresponding RBC charge will also be zero.

The following hypothetical Balance Sheet indicates the view of a Holding Company - Holder, Inc. which is 100% owned by MEGA Life Insurance Company (it assumes that the value reported by the downstream holding company for the U.S. RBC filing insurer is the same as the statutory value established for the insurer on a look-through basis):

	Balance S	Sheet	
	Holder,	Inc.	
	12/31/XX	XXX	
ABC Life Company	10.000.000	Long Term Debt	5,000,000
XYZ Casualty Company	15,000,000	Other Liabilities	2,000,000
ANH Health Company	3,000,000		
Other Common Stock	17,000,000	Total Liabilities	7,000,000
Cash	7,000,000		
Other Assets	5,000,000	Equity	50,000,000
Total Assets	57,000,000	Total Liabilities & Equity	57,000,000
	ANH Health Company Other Common Stock Cash Other Assets	ABC Life Company 10,000,000 XYZ Casualty Company 15,000,000 ANH Health Company 3,000,000 Other Common Stock 17,000,000 Cash 7,000,000 Other Assets 5,000,000	XYZ Casualty Company 15,000,000 Other Liabilities  ANH Health Company 3,000,000 Other Common Stock 17,000,000 Total Liabilities  Cash 7,000,000 Other Assets 5,000,000 Equity

The RBC calculation for Holder, Inc.'s value in excess of the indirectly owned insurance affiliates is as follows:

Stat. Book

	Jiai. Dook	
Company	<u>value</u>	Source:
Holder, Inc. aff/subs subject to RBC	50,000,000	MEGA Life Sch D - Part 6, Section 1
ABC Life Company	10,000,000	Holder, Inc. Stat. balance sheet
XYZ Casualty Company	15,000,000	Holder, Inc. Stat. balance sheet
ANH Health Company	3,000,000	Holder, Inc. Stat. balance sheet
Subtotal	28,000,000	
Holder, Inc. excl. RBC aff/subs	22,000,000	(amount subject to the 30.0% factor for Holding Company Value in Excess of Indirectly Owned Insurance Affiliates/Subsidiaries)

The following table shows the LR044 entries that MEGA Life Insurance Company (which owns 100% owns of Holder, Inc.) would report for the indirectly owned insurance subsidiaries under Holder, Inc. This table assumes that Holder, Inc. owns 40%, 50% and 25% of ABC Life, XYZ Casualty, and ANH Health, respectively. The table also assumes that the RBC values shown for these subsidiaries at the 100% level are the correct RBC After Covariance but Before Operational Risk.

				LR044 Column		
		4	5	6	9	10
Affiliates/Subsidiaries	Affiliates/Subsidiaries Type	100% RBC	Book Adjusted	Total Value of	%	RBC Required
			Carrying Value	Affiliates/Subsidiaries	Owned	
ABC Life Company	Indirect U.S. Life Aff/Sub	5,000,000	10,000,000	25,000,000	40%	2,000,000
XYZ Casualty Company	Indirect U.S. P&C Aff/Sub	12,000,000	15,000,000	30,000,000	50%	6,000,000
ANH Health Company	Indirect U.S. Health Aff/Sub	6,000,000	3,000,000	12,000,000	25%	1,500,000

The risk-based capital charge for the parent insurer preparing the calculation is a 30.0 percent charge against the holding company value in excess of the indirectly owned insurance affiliates/subsidiaries as calculated in the prior example. Enter information in the appropriate columns of the worksheet, omitting those columns that do not apply (Column (3) – NAIC Company Code or Alien ID Number and Column (4) Affiliate's RBC After Covariance).

#### 4. Investment Subsidiaries

An investment subsidiary is a subsidiary that exists only to invest the funds of the parent company. The term "investment subsidiary" is defined in the NAIC's *Annual Statement Instructions* as any subsidiary, other than a holding company, engaged or organized primarily to engage in the ownership and management of investments for the insurer. An investment subsidiary shall not include any broker-dealer or a money management fund managing funds other than those of the parent company. The risk-based capital charge for the ownership of an investment subsidiary is based on the risk-based capital of the underlying assets, pro-rated for the degree of ownership. The basis for this calculation is the assumption that the charge should be the same as it would be if the life insurer held the assets directly.

Report information regarding any investment subsidiaries. Subsidiaries reported in this section will be assigned an affiliate code of "4" for investment subsidiaries. The amount of reported common stock should be the same as Schedule D, Part 6, Section 1, Line 1699999. Preferred stock information should be the same as Schedule D, Part 6, Section 1, Line 0799999.

#### Affiliates/Subsidiaries that are Not Subject to RBC

#### 5. <u>Directly Owned Alien Insurance Affiliates/Subsidiaries</u>

For purposes of this formula, the risk-based capital of each alien insurance affiliate/subsidiary is zero. Report information for any non-U.S. insurance affiliate/subsidiary, both life and property and casualty.

For each affiliate/subsidiary, report the name and alien insurer identification number. For purposes of this formula, the statement value of common and preferred stock and the total outstanding value of common and preferred stock for alien insurance affiliates/subsidiaries should be entered as zero. Companies reported in this section will be assigned an affiliate/subsidiary code of "5" for alien insurers.

For each affiliate/subsidiary, enter the following information:

- Company Name,
- Alien Insurer Identification Number,

- Book Adjusted carrying value of common and preferred stock,
- Total Outstanding value of common and preferred stock,
- Book/adjusted carrying value of the common and preferred stock from Schedule D, Part 6, Section 1, Line 1499999. If no value is reported in the Total Value of Affiliate's/Subsidiary's common and preferred stock columns (6) and (8), the program will assume 100 percent ownership.

## 6. <u>Indirectly Owned Alien Insurance Affiliates/Subsidiaries</u>

Consistent with the treatment of Directly Owned Alien Insurance Subsidiaries / Affiliates, for purposes of this formula, the carrying value and risk-based capital charge of each alien insurance affiliate is zero.

For each affiliate/Subsidiary enter the following information:

- Company Name,
- Alien Insurer Identification Number,
- Book Adjusted carrying value of common and preferred stock,
- Total Outstanding value of common and preferred stock,
- Book/adjusted carrying value of the common and preferred stock from Schedule D, Part 6, Section 1, Lines 1499999 and 0599999. If no value is reported in the Total Value of Affiliate's/Subsidiary's Common and preferred stock columns (6) and (8), the program will assume 100 percent ownership.

#### 7. <u>Investment in Upstream Affiliate (Parent)</u>

The pre-tax Risk-Based Capital (RBC) for an investment in an upstream parent is 30.0 percent of the book/adjusted carrying value of the common and preferred stock, regardless of whether that upstream parent is subject to RBC. Report the appropriate information from Schedule D, Part 6, Section 1, Lines 0199999 and 1099999 in Columns (1) through (6).

For each affiliate, enter the following information:

- Company Name,
- Affiliate Type,
- NAIC Company Code,
- Book Adjusted carrying value of common and preferred stock,
- Total Outstanding value of common and preferred stock.

## 8. Directly Owned U.S. Insurance Affiliates/Subsidiaries Not Subject to RBC

- a. Health Insurance Companies and Health Entities Not Subject to RBC
- b. Property and Casualty Insurance Companies Not Subject to RBC, such as title insurers, monoline financial guaranty insurers, and monoline mortgage guarantee insurers
- c. Life Insurance Companies Not Subject to RBC, such as life insurance affiliate/subsidiary exempted from RBC

The risk-based capital for insurers not subject to RBC is based on the underlying statute, regulation, or rule governing capital requirements for such entities. If not otherwise specified by statute, regulation or rule, the risk-based capital for an investment in a U.S. insurer that is not required to file an RBC formula Investment is 0.300 times the book/adjusted carrying value of the common and preferred stock.

#### 9. Non-Insurance Affiliates/Subsidiaries Not Subject to RBC

- a. Financial entities with a capital requirement imposed by a regulatory body (e.g. a bank)
- b. Other financial entities without regulatory capital requirements
- c. Other Non-financial entities

The risk-based capital for entity types a, b, and c. is 0.300 times the book/adjusted carrying value of the common and preferred stock. The affiliate/subsidiary code for Non-Insurance Affiliates/Subsidiaries Not Subject to RBC is "9." Reported amounts use Schedule D, part 6, Schedule 1, Line 0899999, and Line 1799999 as the basis of reporting.

#### 10. Publicly Traded Insurance Affiliates/Subsidiaries Held at Market Value

The risk-based capital for a publicly traded insurance affiliate/subsidiary held at market value after any "discount," is calculated in two parts. First, calculate and report the risk-based capital of the affiliate/subsidiary according to the relevant instructions above for Insurance Affiliates/Subsidiaries that are Subject to a RBC-look-through Calculation. Second, calculate the additional risk-based capital charge as 34.6 percent pre-tax of any excess of the market (statement) value over the book value of the affiliate/subsidiary. The result of the second calculation will be added to the C-10 component.

## APPENDIX 3 – EXAMPLE USED FOR AFFILIATED/SUBSIDIARY STOCKS

To determine the value of total outstanding common stock or total outstanding preferred stock, divide the book/adjusted carrying value of the investment (found in Schedule D - Part 6 - Section 1, Column 12). For example:

Subsidiary Insurance Company	Owner's Book / Adjusted Carrying Value	Percentage Ownership	<b>Total Stock Outstanding</b>
Subsidiary #1	\$1,000,000	100%	\$1,000,000
Subsidiary #2	\$1,000,000	75%	\$1,333,333
Subsidiary #3	\$1,000,000	50%	\$2,000,000
Subsidiary #4	\$1,000,000	25%	\$4,000,000
Subsidiary #5	\$1,000,000	10%	\$10,000,000

# Confidential when Completed

#### CALCULATION OF TAX EFFECT FOR LIFE AND FRATERNAL RISK-BASED CAPITAL

			(1)		(2)
	ASSET RISKS	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	=
(001)	Edig-telli Bolids – IVAIC I	Column (3) Line (2.8) Exoto On-Bullate Sheet Collateria	^	0.1000	
(002)	Long-term Bonds – NAIC 2	LR002 Bonds Column (2) Line (3.4) + LR018 Off-Balance Sheet Collateral	X	0.1680	=
(002)	200g telin 200a 2	Column (3) Line (3.4)		0.1000	
(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	=
	Mortgages				
	In Good Standing				
	Residential Mortgages - Insured	LR004 Mortgages Column (6) Line (1)	X	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	=
(025)	In Process of Foreclosure	Thought and the control of the contr		0.1555	
(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.

(2) RBC Tax Effect

#### CALCULATION OF TAX EFFECT FOR LIFE AND FRATERNAL RISK-BASED CAPITAL (CONTINUED)

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

#### CALCULATION OF TAX EFFECT FOR LIFE AND FRATERNAL RISK-BASED CAPITAL (CONTINUED)

			(1)	т г .	(2)
(0.62)	S I DA D. INVICE	Source Source	RBC Amount	Tax Factor	RBC Tax Effect
(063)	Sch BA Bond NAIC 1	LR008 Other Long-Term Assets Column (5) Line (2)			
(064)	Sch BA Bond NAIC 2	LR008 Other Long-Term Assets Column (5) Line (3)	;	( 0.1575 =	
(065)	Sch BA Bond NAIC 3	LR008 Other Long-Term Assets Column (5) Line (4)		C 0.1575 =	
(066)	Sch BA Bond NAIC 4	LR008 Other Long-Term Assets Column (5) Line (5)		C 0.1575 =	
(067)	Sch BA Bond NAIC 5	LR008 Other Long-Term Assets Column (5) Line (6)		C 0.1575 =	
(068)	Sch BA Bond NAIC 6	LR008 Other Long-Term Assets Column (5) Line (7)		( 0.2100 =	
(069)	BA Bond Reduction - Reinsurance	LR008 Other Long-Term Assets Column (5) Line (9)		( 0.2100 =	
(070)	BA Bond Increase - Reinsurance	LR008 Other Long-Term Assets Column (5) Line (10)		C 0.2100 =	
(071)	BA Preferred Stock NAIC 1	LR008 Other Long-Term Assets Column (5) Line (12.3)		C 0.1575 =	
(072)	BA Preferred Stock NAIC 2	LR008 Other Long-Term Assets Column (5) Line (13)		C 0.1575 =	
(073)	BA Preferred Stock NAIC 3	LR008 Other Long-Term Assets Column (5) Line (14)		C 0.1575 =	
(074)	BA Preferred Stock NAIC 4	LR008 Other Long-Term Assets Column (5) Line (15)	:	C 0.1575 =	·
(075)	BA Preferred Stock NAIC 5	LR008 Other Long-Term Assets Column (5) Line (16)	:	C 0.1575 =	·
(076)	BA Preferred Stock NAIC 6	LR008 Other Long-Term Assets Column (5) Line (17)		C 0.2100 =	·
(077)	BA Preferred Stock Reduction-Reinsurance	LR008 Other Long-Term Assets Column (5) Line (19)		C 0.2100 =	:
(078)	BA Preferred Stock Increase - Reinsurance	LR008 Other Long-Term Assets Column (5) Line (20)		C 0.2100 =	:
(079)	Rated Surplus Notes	LR008 Other Long-Term Assets Column (5) Line (31)	:	C 0.1575 =	·
(080)	Rated Capital Notes	LR008 Other Long-Term Assets Column (5) Line (41)		C 0.1575 =	:
(081)	BA Common Stock Affiliated	LR008 Other Long-Term Assets Column (5) Line (48.3)		C 0.2100 =	:
(082)	BA Collateral Loans	LR008 Other Long-Term Assets Column (5) Line (50)		ζ 0.1575 =	
(083)	Other BA Assets	LR008 Other Long-Term Assets Column (5) Line (52.3) + LR018 Off-Balance		C 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)	2	ζ 0.2100 =	1
(085)	Other BA Assets Increase - Reinsurance	LR008 Other Long-Term Assets Column (5) Line (55)		ζ 0.2100 =	
(086)	BA Mortgages - In Good Standing	LR009 Schedule BA Mortgages Column (6) Line (11)		ζ 0.1575 =	
(087)	BA Mortgages - 90 Days Overdue	LR009 Schedule BA Mortgages Column (6) Line (15)		ζ 0.1575 =	-
(088)	BA Mortgages - In Process of Foreclosure	LR009 Schedule BA Mortgages Column (6) Line (19)		ζ 0.1575 =	-
(089)	Reduction - Reinsurance	LR009 Schedule BA Mortgages Column (6) Line (21)		ζ 0.2100 =	-
(090)	Increase - Reinsurance	LR009 Schedule BA Mortgages Column (6) Line (22)		C 0.2100 =	
	Miscellaneous				
(091)	Asset Concentration Factor	LR010 Asset Concentration Factor Column (6) Line (62) Grand Total Page		C 0.1575 =	2
(092)	Miscellaneous Assets	LR012 Miscellaneous Assets Column (2) Line (7)		C 0.1575 =	:
(093)	Derivatives - Collateral and Exchange Traded	LR012 Miscellaneous Assets Column (2) Lines (8) + (9) + (10)		C 0.1575 =	
(094)	Derivatives NAIC 1	LR012 Miscellaneous Assets Column (2) Line (11)		C 0.1575 =	:
(095)	Derivatives NAIC 2	LR012 Miscellaneous Assets Column (2) Line (12)		C 0.1575 =	:
(096)	Derivatives NAIC 3	LR012 Miscellaneous Assets Column (2) Line (13)		C 0.1575 =	:
(097)	Derivatives NAIC 4	LR012 Miscellaneous Assets Column (2) Line (14)		C 0.1575 =	
(098)	Derivatives NAIC 5	LR012 Miscellaneous Assets Column (2) Line (15)		ζ 0.1575 =	:
(099)	Derivatives NAIC 6	LR012 Miscellaneous Assets Column (2) Line (16)		ζ 0.2100 =	:
(100)	Miscellaneous Assets Reduction-Reinsurance	LR012 Miscellaneous Assets Column (2) Line (19)		ζ 0.2100 =	:
(101)	Miscellaneous Assets Increase-Reinsurance	LR012 Miscellaneous Assets Column (2) Line (20)		ζ 0.2100 =	
( . )					
+	Denotes lines that are deducted from the total rather than added.				

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

#### CALCULATION OF TAX EFFECT FOR LIFE AND FRATERNAL RISK-BASED CAPITAL (CONTINUED)

	(102)	Replications
	(103)	Reinsurance
ı	(104)	Investment Affiliates
	(105)	Investment in Upstream Affiliate (Parent)
	(106)	Directly Owned Health Insurance Companies or Health Entities Not Subject to RBC
	(107)	Directly Owned Property and Casualty Insurance Companies Not Subject to RBC
	(108)	Directly Owned Life Insurance Companies Not Subject to RBC
	(109)	Publicly Traded Insurance Affiliates
	(110)	Subtotal for C-10 Assets
		C-0 Affiliated Common Stock
	(111)	Off-Balance Sheet and Other Items
	(112)	Off-Balance Sheet Items Reduction - Reinsurance
	(113)	Off-Balance Sheet Items Increase - Reinsurance
	(114)	Directly Owned Health Insurance Companies or Health Entities
	(115)	Directly Owned Property and Casualty Insurance Affiliates
	(116)	Directly Owned Life Insurance Affiliates
	(117)	Indirectly Owned Health Insurance Companies or Health Entities
	(118)	Indirectly Owned Property and Casualty Insurance Affiliates
	(119)	Indirectly Owned Life Insurance Affiliates
	(120)	Affiliated Alien Insurers - Directly Owned
	(121)	Affiliated Alien Insurers - Indirectly Owned
	(122)	Subtotal for C-0 Affiliated Common Stock
		Common Stock
	(123)	Unaffiliated Common Stock
	(123)	Chainnated Common Stock
	(124)	Credit for Hedging - Common Stock
	(125)	Stock Reduction - Reinsurance
	(126)	Stock Increase - Reinsurance
	(127)	BA Common Stock Unaffiliated
	(128)	BA Common Stock Affiliated - C-1cs
	(129)	Common Stock Concentration Factor
ĺ	(130)	NAIC 01 Working Capital Finance Notes
ĺ	(131)	NAIC 02 Working Capital Finance Notes
ĺ	(132)	Holding Company in Excess of Indirect Subs
ĺ	(133)	Affiliated Non-Insurers
ĺ	(134)	Total for C-1cs Assets
ĺ		Insurance Risk
ĺ	(135)	Disability Income Premium

<sup>†</sup> Denotes lines that are deducted from the total rather than added.

	(1)		(2)
Source	RBC Amount	Tax Factor	RBC Tax Effect
LR013 Replication (Synthetic Asset) Transactions and Mandatory		X 0.1575	=
Convertible Securities Column (7) Line (9999999)			<u> </u>
LR016 Reinsurance Column (4) Line (17)		X 0.2100	=
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (8)		X 0.2100	=
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (15)		X 0.2100	=
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (16)		X 0.2100	=
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (17)		X 0.2100	=
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (18)		X 0.2100	=
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (22)		X 0.2100	=
Sum of Lines (001) through (109), Recognizing the Deduction of Lines (013),			
(014), (015), (036), (044), (049), (056), (061), (069), (077), (084), (089) and (100)			
LR017 Off-Balance Sheet and Other Items Column (5) Line (27)		X 0.1575	=
LR017 Off-Balance Sheet and Other Items Column (5) Line (28)		X 0.2100	÷
LR017 Off-Balance Sheet and Other Items Column (5) Line (29)		X 0.2100	= '
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (1)		X 0.2100	=
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (2)		X 0.2100	=
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (3)		X 0.2100	=
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (4)		X 0.2100	=
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (5)		X 0.2100	=
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (6)		X 0.2100	=
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Lines (9) + (10) + (11)	-	X 0.0000	
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Lines (12) + (13) + (14)	-	X 0.0000	
Lines (111)-(112)+(113)+(114)+(115)+(116)+(117)+(118)+(119)+(120)+(121)	-	0.0000	
LR005 Unaffiliated Preferred and Common Stock Column (5) Line (17) +		X 0.2100	=
LR018 Off-Balance Sheet Collateral Column (3) Line (16)		74 0.2100	
LR015 Hedged Asset Common Stock Schedule Column (10) Line (0299999)		X 0.2100	= +
LR005 Unaffiliated Preferred and Common Stock Column (5) Line (19)		X 0.2100	
LR005 Unaffiliated Preferred and Common Stock Column (5) Line (20)		X 0.2100	
LR008 Other Long-Term Assets Column (5) Line (47)		X 0.2100	
LR008 Other Long-Term Assets Column (5) Line (49.2)		X 0.2100	
LR011 Common Stock Concentration Factor Column (6) Line (6)		X 0.2100	
LR008 Other Long-Term Assets Column (5) Line (5).1)		X 0.1575	=
LR008 Other Long-Term Assets Column (5) Line (51.2)	-	X 0.1575	_
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (7)		X 0.2100	=
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Lines (19) + (20) + (21)		X 0.2100	=
Lines (123)-(124)-(125)+(126)+(126)+(129)+(130)+(131)+(132)+(133)		0.2100	
2			
LR019 Health Premiums Column (2) Lines (21) through (27)		X 0.2100	=

# Company Name

#### CALCULATION OF TAX EFFECT FOR LIFE AND FRATERNAL RISK-BASED CAPITAL (CONTINUED)

(136)	Long-Term Care
(137)	Life Insurance C-2 Risk
(138)	Group Insurance C-2 Risk
(138b)	Longevity C-2 Risk
(139)	Disability and Long-Term Care Health
	Claim Reserves
(140)	Premium Stabilization Credit
(141)	Total C-2 Risk
(142) (143) (144) (145) (146)	Interest Rate Risk Health Credit Risk Market Risk Business Risk Health Administrative Expenses
(147)	Total Tax Effect

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Source LR019 Health Premiums Column (2) Line (28) + LR023 Long-Term Care	(1) RBC Amount	X	Tax Factor 0.2100	=	(2) RBC Tax Effect
Column (4) Line (7)		_			
LR025 Life Insurance Column (2) Line (8)		X	0.2100		
LR025 Life Insurance Column (2) Lines (20) and (21)		X	0.2100	=	
LR025-A Longevity Risk Column (2) Line (5)		X	0.2100	=	
LR024 Health Claim Reserves Column (4) Line (9) + Line (15)		X	0.2100	=	
LR026 Premium Stabilization Reserves Column (2) Line (10) L(135) + L(136) + L(139) + L(140) + Greatest of [Guardrail Factor * (L(137)+L(138)), Guardrail Factor * L(138b), Square Root of [(L(137) + L(138))2 + L(138b)2 + 2 * (Correlation Factor) * (L(137) + L(138)) **L(138b) [1]		X	0.0000	= .	
LR027 Interest Rate Risk Column (3) Line (36)		X	0.2100	=	
LR028 Health Credit Risk Column (2) Line (7)		X	0.0000	=	
LR027 Interest Rate Risk Column (3) Line (37)		X	0.2100	=	
LR029 Business Risk Column (2) Line (40)		X	0.2100	=	
LR029 Business Risk Column (2) Line (57)		X	0.0000	=	
Lines (110) + (122) + (134) + (141) + (142) + (143) + (144) + (145) + (146)		_			

NAIC Company Code

<sup>†</sup> Denotes lines that are deducted from the total rather than added.

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

# CALCULATION OF AUTHORIZED CONTROL LEVEL RISK-BASED CAPITAL

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

- (1) Directly Owned Health Insurance Companies or Health Entities
- (2) Directly Owned Property and Casualty Insurance Affiliates
- (3) Directly Owned Life Insurance Affiliates
- (4) Indirectly Owned Health Insurance Companies or Health Entities
- (5) Indirectly Owned Property and Casualty Insurance Affiliates
- (6) Indirectly Owned Life Insurance Affiliates
- (7) Affiliated Alien Insurers Directly Owned
- (8) Affiliated Alien Insurers Indirectly Owned
- (9) Off-Balance Sheet and Other Items
- (10) Total (C-0) Pre-Tax
- (11) (C-0) Tax Effect
- (12) Net (C-0) Post-Tax

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

- (13) Schedule D Unaffiliated Common Stock
- (14) Schedule BA Unaffiliated Common Stock
- (15) Schedule BA Affiliated Common Stock C-1cs
- (16) Common Stock Concentration Factor
- (17) Holding Company in Excess of Indirect Subs
- (18) Affiliated Non-Insurers
- (19) Total (C-1cs) Pre-Tax
- (20) (C-1cs) Tax Effect
- (21) Net (C-1cs) Post-Tax

#### Asset Risk - All Other (C-10)

- (22) Bonds after Size Factor
- (23) Mortgages (including past due and unpaid taxes)
- (24) Unaffiliated Preferred Stock
- (25) Investment Affiliates
- (26) Investment in Upstream Affiliate (Parent)
- (27) Directly Owned Health Insurance Companies or Health Entities Not Subject to RBC
- (28) Directly Owned Property and Casualty Insurance Companies Not Subject to RBC
- (29) Directly Owned Life Insurance Companies Not Subject to RBC
- (30) Publicly Traded Insurance Affiliates
- (31) Separate Accounts with Guarantees

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

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RBC

Requirement

LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (1)	
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (2)	
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (3)	
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (4)	
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (5)	
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (6)	
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Lines (9) + (10) + (11)	
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Lines (12) + (13) + (14)	
LR017 Off-Balance Sheet and Other Items Column (5) Line (34)	
Sum of Lines (1) through (9)	
LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (122)	
Line (10) - Line (11)	
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/Subsidiary Stocks Column (4) Line (7)	
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Lines (19) + (20) + (21)	
Sum of Lines (13) through (18)	
LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (134)	
Line (19) - Line (20)	
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/Subsidiary Stocks Column (4) Line (8)	
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (15)	
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (16)	
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (17)	
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (18)	
LR042 Summary for Affiliated/Subsidiary Stocks Column (4) Line (22)	
L D006 Separate Accounts Column (3) Line (7)	

Source

#### CALCULATION OF PHILIPPEZED CONTROL LEVEL RISK-BASED CAPITAL (CONTINUED)

- (32) Synthetic GIC's (C-10)
- (33) Surplus in Non-Guaranteed Separate Accounts
- (34) Real Estate (gross of encumbrances)
- (35) Schedule BA Real Estate (gross of encumbrances)
- (36) Other Long-Term Assets
- (37) Schedule BA Mortgages
- (38) Concentration Factor
- (39) Miscellaneous
- (40) Replication Transactions and Mandatory Convertible Securities
- (41) Reinsurance
- (42) Total (C-10) Pre-Tax
- (43) (C-1o) Tax Effect
- (44) Net (C-1o) Post-Tax

#### Insurance Risk (C-2)

- (45) Individual and Industrial Life Insurance
- (46) Group and Credit Life Insurance and FEGI/SGLI
- (46b) Longevity Risk
- (47) Total Health Insurance
- (48) Premium Stabilization Reserve Credit
- (49) Total (C-2) Pre-Tax
- (50) (C-2) Tax Effect
- (51) Net (C-2) Post-Tax

#### Interest Rate Risk (C-3a)

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

#### Health Credit Risk (C-3b)

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

#### Market Risk (C-3c)

- (58) Total Market Risk Pre-Tax
- (59) (C-3c) Tax Effect
- (60) Net (C-3c) Post-Tax

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

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	RBC
<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 (22) through (41)	
LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (110)	
Line (42) - Line (43)	
LR025 Life Insurance Column (2) Line (8)	
LR025 Life Insurance Column (2) Lines (20) and (21)	
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(47) + L(48) + Greatest of [Guardrail Factor * $(L(45) + L(46))$ , Guardrail Factor * $L(46b)$ , Square Root of [ $(L(45) + L(46))2 + L(46b)2 + 2 * (Correlation Factor) * (L(45) + L(46)) * L(46b)]$	
LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (141) Line (49) - Line (50)	
Line (47) - Line (50)	
I DOZIL D D. I. G. L (A) L (A)	
LR027 Interest Rate Risk Column (3) Line (36)  LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (142)	
Line (52) - Line (53)	
Line (32) - Line (33)	
I DOOR Hould Condit Dish Colours (A) Line (7)	
LR028 Health Credit Risk Column (2) Line (7)  LR028 Calculation of Tay Effect for Life and Fortunal Birls Board Conital Column (2) Line (142)	
LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (143) Line (55) - Line (56)	
()	
LD027 Interest Park Birls Colores (2) Line (27)	
LR027 Interest Rate Risk Column (3) Line (37)  LR030 Calculation of Tax Effect for Life and Fraternal Risk-Based Capital Column (2) Line (144)	
Line (58) - Line (59)	-

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RBC

	Source	Requirement
LR029 Business Risk Column (2) Lines (12) + (24)	+(36)	
LR029 Business Risk Column (2) Line (39)		
Lines (61) + (62)		
LR030 Calculation of Tax Effect for Life and Frater	rnal Risk-Based Capital Column (2) Line (145)	
Line (63) - Line (64)		
LR029 Business Risk Column (2) Line (57)		
LR030 Calculation of Tax Effect for Life and Frater	nal Risk-Based Capital Column (2) Line (146)	
Line (66) - Line (67)		
DEPORT A MOUNT ON BARENT COMBANNIC I	DDC IF ADDI ICADI F	
REPORT AMOUNT ON PARENT COMPANY'S F		
$L(12)+L(65) + Square Root of [(L(44) + L(54))^2 + L(65)]$	$+(L(21)+L(60))^2+L(51)^2+L(57)^2$	
$+ L(68)^2$ ]		
0.03 x L(69)		
Company Records		
Line (70) - (Line (65) + Line (71)) (Not less than ze	ero)	
	,	
LR036 XXX/AXXX Reinsurance Primary Security	Shortfall by Cession Column (7) Line (9999999)	
Multiplied by 2		
Line (69) + Line (72) + Line (73)		
Line (74) x 0.50		
Line (74) x 0.30		
L(10)+L(63) + Square Root of [(L(42) + L(52)) <sup>2</sup> +	$+(I_1(19)+I_1(58))^2+I_1(49)^2+I_1(55)^2$	
+ L(66) <sup>2</sup>	· (a(x) · a(v)) · a(x) · b(v)	
Line (76) v 0.50		

(61) Premium Component

- (62) Liability Component
- (63) Subtotal Business Risk (C-4a) Pre-Tax
- (64) (C-4a) Tax Effect
- (65) Net (C-4a) Post-Tax

#### Business Risk (C-4b)

- (66) Health Administrative Expense Component of Business Risk (C-4b) Pre-Tax
- (67) (C-4b) Tax Effect
- (68) Net (C-4b) Post-Tax

#### Total Risk-Based Capital After Covariance Before Basic Operational Risk

(69) C-0 + C-4a + Square Root of  $[(C-1o + C-3a)^2 + (C-1cs + C-3c)^2 + (C-2)^2 + (C-3b)^2 + (C-4b)^2]$ 

- (70) Gross Basic Operational Risk
- (71) C-4a of U.S. Life Insurance Subsidiaries
- (72) Net Basic Operational Risk
- (73) Primary Security Shortfall Calculated in Accordance With Actuarial Guideline XLVIII Multiplied by 2
- (74) Total Risk-Based Capital After Covariance (Including Basic Operational Risk and Primary Security Shortfall multiplied by 2)

#### Authorized Control Level Risk-Based Capital (After Covariance Adjustment and Shortfall)

(75) Total Risk-Based Capital After Covariance Times Fifty Percent

#### Tax Sensitivity Test

- (76) Tax Sensitivity Test: Total Risk-Based Capital After Covariance
- (77) Tax Sensitivity Test: Authorized Control Level Risk-Based Capital

#### SUMMARY FOR AFFILIATED/SUBSIDIARY INVESTMENTS STOCKS

		(1)	(2)	(3)		(4)	
	Affiliate	Book / Adjusted		Difference			Number of
Affiliate Type	Code	Carrying Value	Book Value †	Col. (1) - (2)	RBC Basis	RBC Requirement	Companies
(1) Directly Owned Health Insurance Companies or Health Entities	1a		XXX	XXX	Subsidiaries' Total Risk-Based Capital After Covariance / 0.79		
(2) Directly Owned Property and Casualty Insurance Affiliates	1b		XXX	XXX	Subsidiaries' Total Risk-Based Capital After Covariance / 0.79		
(3) Directly Owned Life Insurance Affiliates	1c		XXX	XXX	Subsidiaries' Total Risk-Based Capital After Covariance / 0.79		
(4) Indirectly Owned Health Insurance Companies or Health Entities	2a		XXX	XXX	Subsidiaries' Total Risk-Based Capital After Covariance / 0.79		
(5) Indirectly Owned Property and Casualty Insurance Affiliates	2b		XXX	XXX	Subsidiaries' Total Risk-Based Capital After Covariance / 0.79		
(6) Indirectly Owned Life Insurance Affiliates	2c		XXX	XXX	Subsidiaries' Total Risk-Based Capital After Covariance / 0.79		
(7) Holding Company in Excess of Indirect Subs	3		XXX	XXX	X 0.300 =		
(8) Investment Subsidiary	4		XXX	XXX	Subsidiaries' Total Risk-Based Capital After Covariance / 0.79		
(9) Directly Owned Alien Health Insurance Companies or Health Entities	5a		XXX	XXX	X 1.000 =		
(10) Directly Owned Alien Property and Casualty Insurance Affiliates	5b		XXX	XXX	X 1.000 =		
(11) Directly Owned Alien Life Insurance Affiliates	5c		XXX	XXX	X 1.000 =		
(12) Indirectly Owned Alien Health Insurance Companies or Health Entities	6a		XXX	XXX	X 1.000 =		
(13) Indirectly Owned Alien Property and Casualty Insurance Affiliates	6b		XXX	XXX	X 1.000 =		
(14) Indirectly Owned Alien Life Insurance Affiliates	6c		XXX	XXX	X 1.000 =		
(15) Investment in Upstream Affiliate (Parent)	7		XXX	XXX	X 0.300 =		
(16) Directly Owned Health Insurance Companies or Health Entities Not Subject to RBC	8a		XXX	XXX	X 0.300 =		
(17) Directly Owned Property and Casualty Insurance Companies Not Subject to RBC	8b		XXX	XXX	X 0.300 =		
(18) Directly Owned Life Insurance Companies Not Subject to RBC	8c		XXX	XXX	X 0.300 =		
(19) Non-Insurance Entities with a Capital Equirement Imposed by a Regulatory Body	9a		XXX	XXX	X 0.300 =		
(20) Non-Insurance Other Financial Entities without Regulatory Capital Requirements	9b		XXX	XXX	X 0.300 =		
(21) Other Non-financial Entites	9c		XXX	XXX	X 0.300 =		
(22) Publicly Traded Insurance Affiliates	10				X 0.346 =		
(23) Total (Sum of Lines (1) through (22)	XXX		XXX		XXX		

<sup>†</sup> If different than book / adjusted carrying value.

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

# CROSSCHECKING FOR AFFILIATED/SUBSIDIARY INVESTMENTS STOCKS

## Affiliated Preferred Stock

			(1)	(2)	(3)
				Total from	
		Annual Statement	Annual Statement	Life and Fraternal Risk-Based	
	Schedule D Part 6 Section 1 Type	Line Number	Total Preferred Stock†	Capital Report‡	Difference
(1)	Parent	0199999			
(2)	U.S. Property and Casualty Insurer	0299999			
(3)	U.S. Life Insurer	0399999			
(4)	U.S. Health Entity	0499999			
(5)	Alien Insurer	0599999			
(6)	Non-Insurer Which Controls Insurer	0699999			
(7)	Investment Subsidiary	0799999			
(8)	Other Affiliates	0899999			
(9)	Total (Sum of Lines (1) through (8))				

## Affiliated Common Stock

			(1)	(2)	(3)
				Total from	
		Annual Statement	Annual Statement	Life and Fraternal Risk-Based	
	Schedule D Part 6 Section 1 Type	Line Number	Total Common Stock†	Capital Report§	Difference
(10)	Parent	1099999			
(11)	U.S. Property and Casualty Insurer	1199999			
(12)	U.S. Life Insurer	1299999			
(13)	U.S. Health Entity	1399999			
(14)	Alien Insurer	1499999			
(15)	Non-Insurer Which Controls Insurer	1599999			
(16)	Investment Subsidiary	1699999			
(17)	Other Affiliates	1799999			
(18)	Total (Sum of Lines (10) through (17))				

<sup>†</sup> Column (1) Lines (1) through (8) and (10) through (17) come from Schedule D Part 6 Section 1 Column 7 of the annual statement.

<sup>‡</sup> Column (2) Lines (1) through (8) come from LR044 Details for Affiliated Investments Column (7).

<sup>§</sup> Column (2) Lines (10) through (17) come from LR044 Details for Affiliated Investments Column (5).

## DETAILS FOR AFFILIATED/SUBSIDIARY INVESTMENTS STOCKS

—— Affiliate Type Direct U.S. Property and Casualty Subsidiaries Direct U.S. Life Subsidiaries Direct and Indirect U.S. Health Subsidiaries Indirect U.S. Property and Casualty Subsidiaries Indirect U.S. Life Subsidiaries Investment Subsidiaries Holding Company in Excess of Indirect Subsidiaries		Affiliate-Code for Column (2)  1  2  3  4  5  6  7	Subs' RBC After Subs' RBC After Subs' RBC After Subs' RBC After Subs' RBC After Subs' RBC After 0.300 x Book/Adj	Covariance / 0.79 Carrying Value	Affiliate Type  Alien Insurance Subsidiaries - Canadian Life  Alien Insurance Subsidiaries - Other  Investment in Parents  Other Affiliate - P&C Insurers not subject to RBC  Other Affiliate - Life Insurers not subject to RBC  Other Affiliate - All Other			Affiliate Code for Column (2)  8 9 10 11 12 13	RBC Basis Subsidiaries' MCCSR / 0.79 1.000 x Book/Adj. Carrying Value 0.300 x Book/Adj. Carrying Value	
	(1)	(2)	(3)	(4) Affiliate's RBC	(5)	(6) Total Value of	(7)	(8) Total Value of	(9)	(10)
		Affiliate Code	NAIC Company Code or Alien ID	After Covariance‡ LR031, Lines (67)+(71), PR032, Line (67), XR025,		Affiliate's Outstanding	Book / Adjusted Carrying Value of Affiliate's	Affiliate's Outstanding	Percent	RBC
	Name of Affiliate	(1 to <b>21</b> )	Number†	Line (37)	Common Stock	Common Stock	Preferred Stock	Preferred Stock	Owned	Requirement*
(0000001)										
(0000002)										
(0000003)										
(0000004)										
(0000005)										
(0000006)										
(0000007)										
(0000008)										
(0000009)										
(0000010)										
(0000011)										
(0000012)										
(0000013)										
(0000011)										
(0000016)										
(0000017)										
(0000018)										
(0000019)										
(0000020)										
(999999)	Total	XXXXX	XXXXX	·		XXXXX		XXXXX	xxxxx	

<sup>†</sup> If applicable.

If applicable. For Canadian life subsidiaries, the Minimum Continuing Capital and Surplus Requirement (MCCSR) should be used.

<sup>\*</sup> The RBC Requirement column is calculated on a pre-tax basis.

## AFFILIATED/SUBSIDIARY STOCKS PR003 – PR005

There are nine categories of affiliated/subsidiary investments that are subject to Risk-Based Capital requirement for common stock and preferred stock holdings. Those nine categories are:

- 1. Directly Owned U.S. Insurance Affiliates/Subsidiaries Subject to a Risk-Based Capital (RBC)-Look-Through Calculation
  - a. Health Insurance Company or Health Entity
  - b. Property and Casualty Insurance Company
  - c. Life Insurance Company
- 2. Indirectly Owned U.S. Insurance Affiliates/Subsidiaries Subject to RBC-Look-Through Calculation
  - a. Health Insurance Company or Health Entity
  - b. Property and Casualty Insurance Company
  - c. Life Insurance Company
- 3. Holding Company Value in Excess of Indirectly Owned Insurance Affiliates/Subsidiaries
- 4. Investment Subsidiaries
- 5. Directly Owned Alien Insurance Affiliates/Subsidiaries
  - a. Health Insurance Company or Health Entity
  - b. Property and Casualty Insurance Company
  - c. Life Insurance Company
- 6. Indirectly Owned Alien Insurance Affiliates/Subsidiaries
  - a. Health Insurance Company or Health Entity
  - b. Property and Casualty Insurance Company
  - c. Life Insurance Company
- 7. Investments in Upstream Affiliate (Parent)
- 8. Directly Owned U.S. Insurance Affiliates/Subsidiaries Not Subject to RBC
  - a. Health Insurance Companies or Health Entities Not Subject to RBC
  - b. Property and Casualty Insurance Companies Not Subject to RBC
  - c. Life Insurance Companies Not Subject to RBC
- 9. Non-Insurance Affiliates/Subsidiaries Not Subject to RBC
  - a. Entities with a capital requirement imposed by a regulatory body
  - b. Other Financial Entities without regulatory capital requirements
  - c. Other Non-financial entities

Enter applicable items for each affiliate/subsidiary in the Details for Affiliated/Subsidiary Stocks worksheet. The program will automatically calculate the risk-based capital charge for each affiliate/subsidiary. When the data is uploaded to the NAIC database, it will be cross-checked and the company will be required to correct any discrepancies and refile a corrected version with the NAIC and/or any state that requires the company to file RBC with its department. The RBC report will display the number of affiliates/subsidiaries. These numbers should be reviewed to ensure that all affiliates/subsidiaries are appropriately reported.

The total of all reported affiliate/subsidiary stock should equal the amounts reported on Schedule D, Part 2, Section 1, Line 4409999999 plus Schedule D, Part 2, Section 2, Line 5979999999 and should also equal Schedule D, Part 6, Section 1, Line 0999999 plus Line 18999999.

Affiliated/Subsidiary investments fall primarily into two broad categories: (a) Insurance Affiliates/Subsidiaries that are Subject to risk-based capital; and (b) Affiliates/Subsidiaries that are Not Subject to risk-based capital. The risk-based capital for these two broad groups differs. A third category of Affiliates/Subsidiaries, publicly traded insurance affiliates/subsidiaries held at market value, has characteristics of both broader categories. As a result, it has a two-part RBC calculation. The general treatment for each is explained below.

Directly owned insurance and health entity affiliates/subsidiaries are affiliates/subsidiaries in which the reporting company owns the stock of the affiliates/subsidiary. Indirectly owned insurance affiliates/subsidiaries and health entities are those where the reporting company owns stock in a holding company, which in turn owns the stock of the insurance affiliates/subsidiary or health entity. Note that there could be multiple holding companies that control the downstream insurance company.

Enter the book/adjusted carrying value of: the common stock in Column (5), the preferred stock in Column (9), the total outstanding common stock in Column (7) and the total outstanding preferred stock of that affiliate/subsidiary in Column (10) of the appropriate worksheet. The percentage of ownership is calculated by summing the book/adjusted carrying values of the owned preferred and common stock and dividing that amount by the sum of all outstanding preferred and common stock.

#### Insurance Affiliates/Subsidiaries that are Subject to RBC

### 1. Directly Owned U.S. Affiliates/Subsidiaries:

The risk-based capital requirement for the reporting company for those insurance affiliates/subsidiaries that are subject to a risk-based capital requirement is based on the Total Risk-Based Capital After Covariance of the subsidiary, prorated for the percent of ownership of that affiliate/subsidiary.

For purposes of Affiliate/Subsidiary Risk all references to Total Risk-Based Capital After Covariance of the affiliate/subsidiary means:

- a. For a Health affiliate/subsidiary RBC filing, Total Risk-Based Capital After Covariance before Basic Operational Risk (XR025, Line (37).
- b. For a P/C affiliate/subsidiary RBC filing, Total Risk-Based Capital After Covariance before Basic Operational Risk (PR032, Line (68).
- c. For a Life affiliate/subsidiary RBC filing, the sum of
  - i. Total Risk-Based Capital After Covariance before Basic Operational Risk (LR031, Line (67); and
  - ii. Primary Security shortfalls for all cessions covered by Actuarial Guideline XLVIII (AG 48) multiplied by two (LR031, Line (71).

For RBC purposes, the reporting insurer must determine the carrying value and the RBC requirement of a directly owned RBC filing affiliate/subsidiary company, even if the RBC filing affiliate/subsidiary is non-admitted for financial reporting purposes. The value reported in annual statement Schedule D, Part 6, Section 1 will be used for RBC purposes. In addition to RBC, the carrying value of the RBC filer must be reported in total adjusted capital for RBC purposes, in order to appropriately balance the numerator with the addition to the denominator value. Enter the carrying value of the insurer on Line XXX of the Calculation of Total Adjusted Capital page to satisfy these instructions.

Equity method Insurance Affiliates/Subsidiaries: Equity method is defined in SSAP 97, Paragraph 8b. as the underlying audited statutory equity of the respective entity's financial statements, adjusted for any unamortized goodwill as provided for in SSAP No. 68—Business Combinations and Goodwill. For those insurance

Affiliates/Subsidiaries of the reporting company that are reported under the equity method, the R<sub>0</sub> charge of the ownership of the common and preferred stock in these Affiliates/Subsidiaries is limited to the lesser of:

- (a) the Total RBC After Covariance of the affiliate/subsidiary times the percentage of ownership, which is the total of common stock and preferred stock; or
- (b) the common and preferred stock book/adjusted carrying value at which the affiliate/subsidiary is carried

Market Value (including discounted market value) Insurance Affiliates/Subsidiaries (See SSAP No. 97, Paragraph 8a.): If the affiliate/subsidiary's common stock is publicly traded and the reporting company carries the affiliate/subsidiary at market value, after any "discount," there are generally two components to the reporting company's RBC generated by the affiliate/subsidiary. The prorated portion is the percentage of ownership of the total common and preferred stock. The smaller of the prorated portion of the affiliate/subsidiary's own statutory surplus or the prorated portion of its RBC after covariance is added to the  $R_0$  component of the larger of its statutory surplus and its RBC after covariance. In this case, the addition to the  $R_2$  component is the larger of a) 22.5 percent of the affiliate/subsidiary's common and preferred stock book/adjusted carrying value in excess of the prorated portion of the affiliate/subsidiary's statutory surplus or b) the prorated portion of the affiliate/subsidiary's RBC after covariance in excess of the prorated portion of its statutory surplus. If the affiliate/subsidiary's common and preferred stock book/adjusted carrying value is less than the prorated portion of its RBC after covariance, but greater than the prorated portion of its statutory surplus, 100 percent of the common and preferred stock book/adjusted carrying value in excess of the prorated portion of the affiliate/subsidiary's statutory surplus is added to the reporting company's  $R_2$  component. If the affiliate/subsidiary's common and preferred stock book/adjusted carrying value is less than the prorated portion of the affiliate/subsidiary's statutory surplus is added to the reporting company's  $R_2$  component. If the affiliate/subsidiary's common and preferred stock book/adjusted carrying value is less than the prorated portion of the affiliate/subsidiary's statutory surplus is added to the reporting company's  $R_2$  component. If the affiliate/subsidiary's common and preferred stock book/adjusted carr

#### 2. Indirectly Owned U.S. Insurance Affiliates/Subsidiaries

For Indirectly Owned U.S. Insurance Affiliates/Subsidiaries, the carrying value and RBC is calculated in the same manner as for directly owned U.S. Insurance Affiliates/Subsidiaries. The RBC for the indirect affiliates/subsidiaries must be calculated prior to completing this RBC report.

SSAP No. 97 provides guidance for the reporting and admittance requirements of SCAs. Accordingly, there may be cases where an indirectly owned RBC filer may not be separately reported in the statutory financial statements (e.g., they are captured within the carrying value of an intermediate holding company). The SSAP No. 97 guidance permits reporting SCAs at the directly owned holding company level or via look-through to the downstream entity (including where the downstream entity is an RBC filer), but an audit of the entity is required for admittance (i.e. if reporting is at the directly owned holding company level, the holding company must be audited, if the reporting is on a look-through basis then the downstream entity must be audited). Regardless of whether there is a look-through applied pursuant to Statutory Accounting Principles (SAP) for annual financial statement reporting, for RBC purposes the reporting insurer must "look-through" all intermediate holding and subsidiary companies to determine the carrying value and the RBC requirement of indirectly owned RBC filing affiliate/subsidiary companies. This involves drilling down to the first RBC filing insurance affiliate/subsidiary and adjusting for percentage ownership of the intermediate entity directly owning the RBC filing affiliate/subsidiary. Both RBC and carrying value of the RBC filer must be reported for RBC purposes, in order to appropriately balance the numerator with the addition to the denominator value. Enter the carrying value of the insurer on Line XXX of the Calculation of Total Adjusted Capital page to satisfy these instructions.

The carrying value for each indirect insurance affiliate/subsidiary is established based on company records using the statutory value of the insurer as reported in the NAIC annual financial statement blank submitted by the affiliate/subsidiary or market value when applicable, and the RBC requirement as determined in its RBC Report adjusted for the ownership percentages (both the percentage of the indirectly owned RBC filing affiliate/subsidiary that is owned by the directly held

downstream holding company and the reporting insurer's ownership percentage in that downstream entity). The value reported by the downstream holding company for the U.S. RBC filing insurer is the same as the statutory value established for the insurer on a look-through basis.

## 3. Holding Company Value in Excess of Indirectly Owned Insurance Affiliates/Subsidiaries

The carrying value of a U.S. Insurance Affiliate/Subsidiary that is subject to RBC is deducted from the value of the directly held holding company or other entity that in turn directly owns the U.S. Insurance Affiliate/Subsidiary that is subject to RBC, based on the value reported for each insurance subsidiary on the downstream immediate holding company or non-insurance owner's balance sheet. That value is prescribed by the NAIC Accounting Practices and Procedures Manual (SSAP No. 97, paragraph 22.a.). A similar exercise is required for each RBC filing insurer and each non-U.S. insurer in order to determine the remaining excess value of the holding company.

The remaining value of the directly held holding company is then subject to a charge that is calculated in accordance with the instructions for Holding Company Value in Excess of Indirectly Owned Insurance Affiliates/Subsidiaries as specified in the RBC formula. If the holding company is not admitted, report the excess carrying value as zero and the corresponding RBC charge will also be zero. If a negative excess value for the downstream holding company results from removing the value of U.S. RBC filing insurers from the downstream holding company's reported value, then the value of that holding company will be floored at zero and the corresponding RBC charge will also be zero.

The following hypothetical Balance Sheet indicates the view of a Holding Company - Holder, Inc. which is 100% owned by MEGA P&C Insurance Company (it assumes that the value reported by the downstream holding company for the U.S. RBC filing insurer is the same as the statutory value established for the insurer on a look-through basis):

		Balance S Holder,	Inc.	
		12/31/XX	XXX	
Cm Stk:	ABC Life Company	10,000,000	Long Term Debt	5,000,000
	XYZ Casualty Company	15,000,000	Other Liabilities	2,000,000
	ANH Health Company	3,000,000		
	Other Common Stock	17,000,000	Total Liabilities	7,000,000
	Cash	7,000,000		
	Other Assets	5,000,000	Equity	50,000,000
	Total Assets	57,000,000	Total Liabilities & Equity	57,000,000

The RBC calculation for Holder, Inc.'s value in excess of the indirectly owned insurance affiliates/subsidiaries is as follows:

	Stat. Book	
Company	<u>value</u>	Source:
Holder, Inc.	50,000,000	MEGA P&C Sch D - Part 6, Section 1
Holder, Inc. Aff/subs subject to RBC		
ABC Life Company	10,000,000	Holder, Inc. Stat. balance sheet
XYZ Casualty Company	15,000,000	Holder, Inc. Stat. balance sheet
ANH Health Company	3,000,000	Holder, Inc. Stat. balance sheet
subtotal	28,000,000	
Holder, Inc. excl. RBC aff/subs	22,000,000	(amount subject to the 22.5% factor for Holding Company Value in Excess of Indirectly Owned Insurance Affiliates/Subsidiaries)

The following table shows the PR003 entries that MEGA P&C Insurance Company (which owns 100% owns of Holder, Inc.) would report for the indirectly owned insurance Affiliates/subsidiaries under Holder, Inc. This table assumes that Holder, Inc. owns 40%, 50% and 25% of ABC Life, XYZ Casualty, and ANH Health, respectively. The table also assumes that the RBC values shown for these affiliates/subsidiaries at the 100% level are the correct RBC After Covariance but Before Operational Risk.

			PR003 Column				
		4 5 7 8 9 13					
			Book Adjusted	Total Value of	Statutory Surplus of		
Affiliates/Subsidiaries	Affiliates/Subsidiaries Type	100% RBC	Carrying Value	Affiliates/Subsidiaries	Affiliates/Subsidiaries	% Owned	RBC Required
ABC Life Company	Indirect U.S. Life Aff/Sub	5,000,000	10,000,000	25,000,000	25,000,000	40%	2,000,000
XYZ Casualty Company	Indirect U.S. P&C Aff/Sub	12,000,000	15,000,000	30,000,000	30,000,000	50%	6,000,000
ANH Health Company	Indirect U.S. Health Aff/Sub	6,000,000	3,000,000	12,000,000	12,000,000	25%	1,500,000

The risk-based capital charge for the parent insurer preparing the calculation is a 22.5 percent charge against the holding company value in excess of the indirectly owned insurance affiliates/subsidiaries as calculated in the prior example. Enter information in the appropriate columns of the worksheet, omitting those columns that do not apply (Column (3) – NAIC Company Code or Alien ID Number and Column (4) Affiliate's RBC After Covariance).

## Affiliates/Subsidiaries that are Not Subject to RBC

#### 4. Investment Subsidiaries

An investment subsidiary is a subsidiary that exists only to invest the funds of the parent company. The term investment subsidiary is defined in the annual statement instructions as any subsidiary, other than a holding company, engaged or organized primarily to engage in the ownership and management of investments for the insurer. An investment subsidiary shall not include any broker-dealer or a money management fund managing funds other than those of the parent company. The risk-based capital for an investment in an investment subsidiary is 22.5 percent of the carrying value of the common and preferred stock.

#### 5. Directly Owned Alien Insurance Affiliates/Subsidiaries

For purposes of this formula, the Risk-Based Capital (RBC) of each directly owned alien insurance affiliate/subsidiary is the annual statement book adjusted carrying value of the reporting company's interest in the affiliate multiplied by 0.500. Enter information for any non-U.S. insurance affiliate/subsidiary: life, property and casualty, and health insurers.

For each affiliate/subsidiary, enter the following information:

- Company Name,
- Alien Insurer Identification Number.
- Book Adjusted carrying value of common and preferred stock,
- Total Outstanding value of common and preferred stock,
- Book/adjusted carrying value of the common and preferred stock from Schedule D, Part 6, Section 1, Line 1499999. If no value is reported in the Total Value of Affiliate's common and preferred stock columns (7) and (11), the program will assume 100 percent ownership.

## 6. <u>Indirectly Owned Alien Insurance Affiliates/Subsidiaries</u>

For Indirectly Owned Alien. Insurance Affiliates/Subsidiaries, the carrying value and RBC charge is calculated in a similar manner as for directly owned Alien Insurance Affiliates/Subsidiaries.

SSAP No. 97 provides guidance for the reporting and admittance requirements of SCAs. Accordingly, there may be cases where an indirectly owned Alien insurers may not be separately reported in the statutory financial statements (e.g., they are captured within the carrying value of an intermediate holding company). The SSAP No. 97 guidance permits reporting SCAs at the directly owned holding company level or via look-through to the downstream entity (including where the downstream entity is an Alien insurer), but an audit of the entity is required for admittance (i.e. if reporting is at the directly owned holding company level, the holding company must be audited, if the reporting is on a look-through basis then the downstream entity must be audited). Regardless of whether there is a look-through applied pursuant to Statutory Accounting Principles (SAP) for annual financial statement reporting, for RBC purposes the reporting insurer must "look-through" all intermediate holding and subsidiary companies to determine the carrying value and the RBC charge that would be imposed had the alien insurance affiliate/subsidiary companies been directly held by the reporting insurer. This involves looking down to the first alien insurer affiliate/subsidiary, unless there is an RBC filer in between and adjusting for percentage ownership of the intermediate entity directly owning the RBC filing affiliate/subsidiary. Both the RBC charge and carrying value of the alien insurer must be reported for RBC purposes, in order to appropriately balance the numerator with the addition to the denominator value. Enter the carrying value of the insurer on Line XXX of the Calculation of Total Adjusted Capital page to satisfy these instructions.

The carrying value of an alien insurance Affiliate/Subsidiary is deducted from the value of the directly held holding company or other entity that in turn directly owns the U.S. Insurance Affiliate/Subsidiary that is subject to RBC, based on the value reported for each insurance subsidiary on the downstream immediate holding company or non-insurance owner's balance sheet. That value is prescribed by the NAIC Accounting Practices and Procedures Manual (SSAP No. 97, paragraph 22.a.). A similar exercise is required for each non-U.S. insurer in order to determine the remaining excess value of the holding company.

The RBC charge to be applied to each indirectly owned alien insurance affiliate/subsidiary is the annual statement book adjusted carrying value of the reporting company's interest in the affiliate/subsidiary multiplied by 0.500 and adjusted to reflect the reporting company's ownership on the holding company. For example, assume NEWBIE Insurance Company acquired 100 percent shares of Holder (a holding company), and Holder owns an Alien Insurance Company, which represents 50 percent of the book adjusted carrying value of Holder. If Holder has a book adjusted carrying value of \$20,000,000, NEWBIE Insurance Company would enter \$10,000,000 (1/2 of \$20,000,000) as the carrying value of the Alien Insurance Company and the RBC charge for the indirect ownership of the Alien insurance affiliate/subsidiary would be \$5,000,000 (0.500 times \$10,000,000). The risk-based capital charge for the parent insurer preparing the calculation is a 22.5 percent charge against the holding company value in excess of the indirectly owned insurance affiliates/subsidiaries.

If NEWBIE Insurance Company only acquired 50 percent shares of Holder, NEWBIE Insurance Company would enter \$5,000,000 (50 percent of 1/2 of \$20,000,000) as the carrying value of the Alien Insurance Company and the RBC charge for the indirect ownership of the Alien insurance affiliate/subsidiary would be \$2,500,000 (0.500 times \$5,000,000). Enter information for any indirectly owned alien insurance subsidiaries.

		PR003 Column				
		4	5	7	9	13
			Book Adjusted	Total Value of		
Affiliates/Subsidiaries	Affiliates/Subsidiaries Type	100% RBC	Carrying Value	Affiliates/Subsidiaries	% Owned	RBC Required
Alien Insurance						
Company	Indirect Alien Life Aff/Sub	5,000,000	10,000,000	20,000,000	50%	2,500,000

For each affiliate/subsidiary enter the following information:

- Company Name,
- Alien Insurer Identification Number,
- Book Adjusted carrying value of common and preferred stock,
- Total Outstanding value of common and preferred stock,
- Book/adjusted carrying value of the common and preferred stock from Schedule D, Part 6, Section 1, Line 1499999. If no value is reported in the Total Value of Affiliate's Common and preferred stock column.

## 7. Investment in Upstream Affiliate (Parent)

The Risk-Based Capital (RBC) for an investment in an upstream parent is 22.5 percent of the book/adjusted carrying value of the common and preferred stock, regardless of whether that upstream parent is subject to RBC. Report the appropriate information from Schedule D, Part 6, Section 1, Lines 0199999 and 1099999 in Columns (1) through (10).

For each affiliate, enter the following information:

- Company Name,
- Affiliate Type Code,
- NAIC Company Code,
- Book Adjusted carrying value of common stock
- Book Adjusted carrying value of preferred stock,
- Total Outstanding value of common and preferred stock.

# 8. <u>Directly Owned U.S. Insurance Affiliates/Subsidiaries Not Subject to RBC</u>

- a. Health Insurance Companies and Health Entities Not Subject to RBC
- b. Property and Casualty Insurance Companies Not Subject to RBC, such as title insurers, monoline financial guaranty insurers, and monoline mortgage guarantee insurers
- c. Life Insurance Companies Not Subject to RBC, such as life insurance subsidiary exempted from RBC

The risk-based capital for insurers not subject to RBC is based on the underlying statute, regulation, or rule governing capital requirements for such entities. If not otherwise specified by statute regulation or rule, the risk-based capital for an investment in a U.S. insurer that is not required to file an RBC formula is 22.5 percent of the book/adjusted carrying value of the common and preferred stock.

# 9. Non-Insurance Affiliates/Subsidiaries Not Subject to RBC

- a. Financial entities with a capital requirement imposed by a regulatory body (e.g., a bank)
- b. Other financial entities without regulatory capital requirements
- c. Other Non-financial entities

The risk-based capital for entity types a, b, and c is 22.5 percent of the book/adjusted carrying value of the common and preferred stock. The affiliate/subsidiary code for Non-Insurance Affiliates/Subsidiaries Not Subject to RBC is "9". Reported amounts use Schedule D, part 6, Schedule 1, Line 0899999, and Line 1799999 as the basis of reporting.

# APPENDIX 3 – EXAMPLE USED FOR AFFILIATED/SUBSIDIARY STOCKS

To determine the value of total outstanding common stock or total outstanding preferred stock, divide the book/adjusted carrying value of the investment (found in Schedule D - Part 6 Section 1, Column 9) by the percentage of ownership (found in Schedule D - Part 6 - Section 1, Column 12). For example:

Subsidiary Insurance Company	Owner's Book / Adjusted Carrying Value	Percentage Ownership	Total Stock Outstanding
Subsidiary #1	\$1,000,000	100%	\$1,000,000
Subsidiary #2	\$1,000,000	75%	\$1,333,333
Subsidiary #3	\$1,000,000	50%	\$2,000,000
Subsidiary #4	\$1,000,000	25%	\$4,000,000
Subsidiary #5	\$1,000,000	10%	\$10,000,000

#### DETAILS FOR AFFILIATED STOCKS PR003

1 1	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
·													
				Affiliate's RBC After									
				Covariance before		Valuation Basis							
			NATO	Basic Operational	Book/Adjusted	of Column (5)	T . 137.1 C	0 0. 1	Book/Adjusted	T . 137 1 C			Market Value Excess
			NAIC Company	Risk* LR031 L67 + L71	Carrying Value (statement value) of	M - Market Value after any	Total Value of Affiliate's	Statutory Surplus of Affiliate Subject	Carrying Value (statement value) of	Total Value of Affiliate's			Component Affiliate Common Stock RBC
			Code or Alien	PR032 L67	Affiliate's Common	"discount"	Outstanding	to RBC (Adjusted	Affiliate's Preferred	Outstanding	Percent	RBC Required (R0	Required (R2
	Name of Affiliate	Affil Type	ID Number	XR025 L37	Stock**	A - All Other	Common Stock	for % Owned)	Stock	Preferred Stock	Owned	Component)	Component)
0000001											100.000%	0	0
0000002											100.000%	0	0
0000003											100.000%	0	0
0000004 0000005											100.000% 100.000%	0	0
0000003											100.000%	0	0
0000007											100.000%	0	0
0000008											100.000%	0	0
0000009											100.000%	0	0
0000010											100.000%	0	0
0000011											100.000%	0	0
0000012 0000013											100.000% 100.000%	0	0
0000013											100.000%	0	0
0000015											100.000%	0	0
0000016											100.000%	0	0
0000017											100.000%	0	0
0000018											100.000%	0	0
0000019 0000020											100.000% 100.000%	0	0
0000020											100.000%	0	0
0000021											100.000%	0	0
0000023											100.000%	0	0
0000024											100.000%	0	0
0000025											100.000%	0	0
0000026 0000027											100.000% 100.000%	0	0
0000027											100.000%	0	0
0000029											100.000%	0	0
0000030											100.000%	0	0
0000031											100.000%	0	0
0000032											100.000%	0	0
0000033											100.000%	0	0
0000034 0000035											100.000% 100.000%	0	0
0000035											100.000%	0	0
0000037											100.000%	0	0
0000038											100.000%	0	0
0000039											100.000%	0	0
0000040											100.000%	0	0
0000041 0000042											100.000% 100.000%	0	0
0000042											100.000%	0	0
0000043											100.000%	0	0
0000045											100.000%	0	0
0000046											100.000%	0	0
0000047											100.000%	0	0
0000048 0000049											100.000% 100.000%	0	0
0000049											100.000%	0	0
(9999999)	Total	XXX	XXX	0	0	XXX	XXX	XXX	0	XXX	100.000/0	0	0

Remark: Subcategory 8a, 8b and 8c are referring to the directly owned insurance affiliates not subject to RBC look-through Indirectly owned insurance affiliate not subject to RBC will be included Category 4

Note: PR007 L12 should now refers to PR003 C(13) L9999999

#REF!
SUBSIDIARY, CONTROLLED AND AFFILIATED INVESTMENTS PR004

				(1)	(2)
				Number of	Total RBC Required
	Affiliate Types	Affil Code	RBC Basis	Companies	
(1)	Directly Owned Health Insurance Companies or Health Entities	la	Sub's RBC After Covariance	0	0
(2)	Directly Owned Property and Casualty Insurance Affiliates	1b	Sub's RBC After Covariance	0	0
(3)	Directly Owned Life Insurance Affiliates	1e	Sub's RBC After Covariance	0	0
(4)	Indirectly Owned Health Insurance Companies or Health Entities	2a	Sub's RBC After Covariance	0	0
(5)	Indirectly Owned Property and Casualty Insurance Affiliates	2b	Sub's RBC After Covariance	0	0
(6)	Indirectly Owned Life Insurance Affiliates	2e	Sub's RBC After Covariance	0	0
(7)	Holding Company in Excess of Indirect Subs	3	0.225	0	0
(8)	Investment Subsidiary	4	0.225	0	0
(9)	Directly Owned Alien Health Insurance Companies or Health Entities	5a	0.5	0	0
(10)	Directly Owned Alien Property and Casualty Insurance Affiliates	5b	0.5	0	0
(11)	Directly Owned Alien Life Insurance Affiliates	5c	0.5	0	0
(12)	Indirectly Owned Alien Health Insurance Companies or Health Entities	6a	0.5	0	0
(13)	Indirectly Owned Alien Property and Casualty Insurance Affiliates	6b	0.5	0	0
(14)	Indirectly Owned Alien Life Insurance Affiliates	6c	0.5	0	0
(15)	Investment in Upstream Affiliate (Parent)	7	0.225	0	0
(16)	Directly Owned Health Insurance Companies or Health Entities Not Subject to RBC	8a	0.225	0	0
(17)	Directly Owned Property and Casualty Insurance Companies Not Subject to RBC	8b	0.225	0	0
(18)	Directly Owned Life Insurance Companies Not Subject to RBC	8c	0.225	0	0
(19)	Non-Insurance Entities with a Capital Equirement Imposed by a Eegulatory Body	9a	0.225	0	0
(20)	Non-Insurance Other Financial Entities without Regulatory Capital Requirements	9ь	0.225	0	0
(21)	Other Non-financial Entites	9c	0.225	0	0
(22)	T-1			0	
(22)	Total			0	0

# SUMMARY FOR SUBSIDIARY, CONTROLLED AND AFFILIATED INVESTMENTS FOR CROSS-CHECKING STATEMENT VALUES PR005

	Affiliated Preferred Stock		(1)	(2)	(3)	
	Schedule D Part 6 Section 1 C7	Annual Statement Line Number	Annual Statement Total Preferred Stock	Total From RBC Report	<u>Difference</u>	
(1)	Parent	0199999	0	C	)	0
(2)	U.S. P&C Insurer	0299999	0	C	<mark>)</mark>	0
(3)	U.S. Life Insurer	0399999	0	C	<mark>)</mark>	0
(4)	U.S. Health Insurer	0499999	0	C	<mark>)</mark>	0
(5)	Alien Insurer	0599999	0	C	)	0
(6)	Non-Insurer Which Controls Insurer	0699999	0	C	)	0
(7)	Investment Subsidiary	0799999	0	C	<mark>)</mark>	0
(8)	Other Affiliates	0899999		C	<mark>)</mark>	0
(9)	Subtotal	0999999	0	C	)	0
	Affiliated Common Stock Schedule D Part 6 Section 1 C7	Annual Statement Line Number	(1) <u>Annual Statement Total</u> <u>Common Stock</u>	(2) Total From RBC Report	(3) <u>Difference</u>	
(10)	Parent	1099999		C	<mark>)</mark>	0
(11)	U.S. P&C Insurer	1199999		(	<mark>)</mark>	0
(12)	U.S. Life Insurer	1299999		(	<mark>)</mark>	0
(13)	U.S.Health Insurer	1399999		(	<mark>)</mark>	0
(14)	Alien Insurer	1499999		(	<mark>)</mark>	0
(15)	Non-Insurer Which Controls Insurer	1599999		(	)	0
(16)	Investment Subsidiary	1699999		(	)	0
(17)	Other Affiliates	1799999		0	<mark>)</mark>	0
(18)	Subtotal	1899999	0	C	)	0

# UNAFFILIATED PREFERRED AND COMMON STOCK PR007

			(1)		(2)
			Book/Adjusted		
	Unaffiliated Preferred Stock	Annual Statement Source	Carrying Value	<u>Factor</u>	RBC Requirement
(1)	NAIC 01 Preferred Stock	Sch D Pt 2 Sn 1	0	0.003	0
(2)	NAIC 02 Preferred Stock	Sch D Pt 2 Sn 1	0	0.010	0
(3)	NAIC 03 Preferred Stock	Sch D Pt 2 Sn 1	0	0.020	0
(4)	NAIC 04 Preferred Stock	Sch D Pt 2 Sn 1	0	0.045	0
(5)	NAIC 05 Preferred Stock	Sch D Pt 2 Sn 1	0	0.100	0
(6)	NAIC 06 Preferred Stock	Sch D Pt 2 Sn 1	0	0.300	0
(7)	TOTAL - UNAFFILIATED PREFERRED STOCK	Sum of Ls (1) through (6)	0		0
	(should equal P2 L2.1 C3 less Sch D-Sum C1 L18)				
	H (C): 4 1 C				
Lo	Unaffiliated Common Stock	0.1.D. 0			
(8)	Total Common Stock	Sch D - Summary C1 L25	0		
(9)	Affiliated Common Stock	Sch D - Summary C1 L24	0		
(10)	Non-Admitted Unaffilated Common Stock	P2 C2 L2.2 - Sch D Pt6 Sn1 C9 L1899999	0		
(11)	Admitted Unaffiliated Common Stock	L(8) - L(9) - L(10)	0	0.150	0
(12)	Market Value Excess Affiliated Common Stock	PR003 C(13) L(9999999)			0
(13)	Total Unaffiliated Common Stock	L(11) + L(12)	0		0

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

## #####

CALCU	JLATION OF TOTAL ADJUSTED CAPITAL	PR029	(1)		(2)
		Annual Statement Reference	(1) <u>Statement Value*</u>	Factor	(2) <u>Adjusted Capital</u>
(1)	Capital and Surplus	P3 C1 L37	0	1.000	0
(2)	Non-Tabular Discount - Losses	Sch P P1-Sum C32 L12	0	1.000	0
(3)	Non-Tabular Discount - Expense	Sch P P1-Sum C33 L12	0	1.000	0
(4)	Discount on Medical Loss Reserves Reported as Tabular in				
	Schedule P	Company Records	0	1.000	0
(5)	Discount on Medical Expense Reserves Reported as Tabular in				
	Schedule P	Company Records	0	1.000	0
(6)	P&C Subs Non-Tabular Discount - Losses	Subs' Sch P Pt1-Sum C32 L12	0	1.000	0
(7)	P&C Subs Non-Tabular Discount - Expense	Subs' Sch P Pt1-Sum C33 L12	0	1.000	0
(8)	P&C Subs Discount on Medical Loss Reserves Reported as				
	Tabular in Schedule P	Subs' Company Records	0	1.000	0
(9)	P&C Subs Discount on Medical Expense Reserves Reported as	• •			
	Tabular in Schedule P	Subs' Company Records	0	1.000	0
(10)	AVR - Life Subs §	Subs P3 C1 L24.01 §	0	1.000	0
(11)	Dividend Liability - Life Subs	Subs P3 C1 L6.1 + L6.2	0	0.500	0
(12)	Carrying Value of Non-Admitted Insurance Affiliates	Included in PR003 Column 5 and Column 9	0	1.000	0
(13)	Total Adjusted Capital Before Capital Notes L(1)-L(2)-L(3)-L(4)-L(4)-L(4)-L(4)-L(4)-L(4)-L(4)-L(4	5)-L(6)-L(7)-L(8)-L(9)+L(10)+L(11 <mark>)-L(12)</mark>		_	0
	Credit for Capital Notes				
(14.1)	Surplus Notes	Page 3 Column 1 Line 33	0		
(14.2)	Limitation on Capital Notes	0.5x[Line(13)-Line(14.1)]-Line 14.1, but not less than zero	0		
(14.3)	Capital Notes Before Limitation	PR028 Column (4) Line (18)	#REF!		
(14.4)	Credit for Capital Notes	Lesser of Column (1) Line(14.2) or Line (14.3)		· 	#REF!
(15)	Total Adjusted Capital (Post-Deferred Tax)	Line (13) + Line (14.4)			#REF!
	Sensitivity Test:				
(16)	Deferred Tax Assets	Page 2, Column 3, Line 18.2	0	1.000	0
(16.1)	Deferred Tax Liabilities	Page 3, Column 1, Line 7.2	0	1.000	0
(17)	Deferred Tax Assets for Subsidiary	Company Record	0	1.000	0
(17.1)	Deferred Tax Liabilities for Subsidiary	Company Record	0	1.000	0
(18)	Total Adjusted Capital For Sensitivity Test	Line (15) - Line (16)+(16.1)-(17)+(17.1)		_	#REF!
	Ex DTA ACL RBC Ratio Sensitivity Test				
(19)	Deferred Tax Asset	Page 2 Column 3 Line 18.2	0	1.000	0
(20)	Total Adjusted Capital Less Deferred	Line (15) less Line (19)		· · · · · · · · · · · · · · · · · · ·	#REF!
. ,	Tax Asset				
(21)	Authorized Control Level RBC	PR034 Comparison of Total Adjusted Capital to Risk-Based Capital	Line (4)		#REF!
(22)	Ex DTA ACL RBC Ratio	Line (20) / Line (21)	` /	-	#REF!
( )				_	

<sup>\*</sup> Report amounts in this column as whole dollars.

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

The portion of the AVR that can be counted as capital is limited to the amount not utilized in asset adequacy testing in support of the Actuarial Opinion for reserves.

## CALCULATION OF TOTAL RISK-BASED CAPITAL AFTER COVARIANCE PR030 R0-R1

			(1)
R0 -Sub	osidiary Insurance Companies and Misc. Other Amounts	PRBC O&I Reference	RBC Amount
		·	
(1)	Affiliated US P&C Insurers - Directly Owned	PR004 L(2)C(2)	0
(2)	Affiliated US P&C Insurers - Indirectly Owned	PR004 L(5)C(2)	0
(3)	Affiliated US Life Insurers - Directly Owned	PR004 L(3)C(2)	0
(4)	Affiliated US Life Insurers - Indirectly Owned	PR004 L(6)C(2)	0
(5)	Affiliated US Health Insurer - Directly Owned	PR004 L(1)C(2)	0
(6)	Affiliated US Health Insurer - Indirectly Owned	PR004 L(4)C(2)	0
(7)	Affiliated Alien Insurers - Directly Owned	PR004 L(9)+L(10)+L(11)C(2)	0
(8)	Affiliated Alien Insurers - Indirectly Owned	PR004 L(12)+L(13)+L(14)C(2)	0
(9)	Misc Off-Balance Sheet - Non-Controlled Assets	PR014 L(15) C(3)	0
(10)	Misc Off-Balance Sheet - Guarantees for Affiliates	PR014 L(16) C(3)	0
(11)	Misc Off-Balance Sheet - Contingent Liabilities	PR014 L(17) C(3)	0
(12)	Misc Off-Balance Sheet - SSAP No.101 Par. 11A DTA	PR014 L(19) C(3)	0
(13)	Misc Off-Balance Sheet - SSAP No.101 Par. 11B DTA	PR014 L(20) C(3)	0
(14)	Total R0	L(1)+L(2)+L(3)+L(4)+L(5)+L(6)+L(7)+L(8)+L(9)+L(10)+L(11)+L(12)+L(13)	0
R1 - Ass	et Risk - Fixed Income		
(15)	Bonds Subject to Size Factor	PR006 L(27)C(5)	0
(16)	Bond Size Factor RBC	PR006 L(30)C(5)	0
(17)	Off-balance Sheet Collateral & Sch DL, PT1 - Total Bonds	PR015 L(27)C(4)	0
(18)	Off-balance Sheet Collateral & Sch DL, PT1 - Cash, & Short-Term Investments and Mort Loans on Real Est.	PR015 L(38)+(39)C(4)	0
(19)	Other Long- Term Assets - Mortgage Loans, LIHTC & WCFI	PR008 L(10)+L(13)+L(14)+L(15)+L(16)+L(17)+L(20)+L(21)C(2)	0
(20)	Misc Assets - Collateral Loans	PR009 L(13)C(2)	0
(21)	Misc Assets - Cash	PR009 L(3)C(2)	0
(22)	Misc Assets - Cash Equivalents	PR009 L(7)C(2)	0
(23)	Misc Assets - Other Short-Term Investments	PR009 L(10)C(2)	0
(24)	Replication -Synthetic Asset: One Half	PR010 L(9999999)C(7)	0
(25)	Asset Concentration RBC - Fixed Income	PR011 L(21)C(3) Grand Total Page	0
(26)	Total R1	L(15)+L(16)+L(17)+L(18)+L(19)+L(20)+L(21)+L(22)+L(23)+L(24)+L(25)	0

#REF!
CALCULATION OF TOTAL RISK-BASED CAPITAL AFTER COVARIANCE PR031 R2-R3

R2 - Asse	t Risk - Equity	PRBC O&I Reference	RBC Amount
			-
(27)	Common & Preferred- Affiliate Investment Subsidiary	PR004 L(8)C(2)	0
(28)	Common & Preferred- Affiliate Hold. Company. in excess of Ins. Subs.	PR004 L(7)C(2)	0
(29)	Common & Preferred- Investment in Parent	PR004 L(15)C(2)	0
(30)	Common & Preferred- Aff'd US P&C Not Subj to RBC	PR004 L(17)C(2)	0
(31)	Common & Preferred- Affil US Life Not Subj to RBC	PR004 L(18)C(2)	0
(32)	Common & Preferred- Affil US Health Insurer Not Subj to RBC	PR004 L(16)C(2)	0
(33)	Common & Preferred- Aff'd Non-insurer	PR004 L(19)+L(20)+L(21)C(2)	0
(34)	Preferred Aff'd Invest Sub	PR004 L(7)C(3)	0
<del>(35)</del>	Preferred - Aff'd Hold. Co. in excess of Ins. Subs.	PR004 L(10)C(3)	0
<del>(36)</del>	Preferred - Investment in Parent	PR004 L(11)C(3)	0
(37)	Preferred - Affil US P&C Not Subj to RBC	PR004 L(12)C(3)	0
(38)	Preferred - Affil US Life Not Subj to RBC	PR004 L(13)C(3)	0
(39)	Preferred - Affil US Health Insurer Not Subj to RBC	PR004 L(14)C(3)	0
<del>(40)</del>	Preferred - Affil Non-insurer	PR004 L(15)C(3)	0
(34)	Unaffiliated Preferred Stock	PR007 L(7)C(2)+PR015 L(34)C(4)	0
(35)	Unaffiliated Common Stock	PR007 L(13)C(2)+PR015 L(35)C(4)	0
(36)	Other Long -Term Assets - Real Estate	PR008 L(7)C(2)	0
(37)	Other Long-Term Assets - Schedule BA Assets	PR008 L(19)C(2)+PR015 L(36)+L(37)C(4)	0
(38)	Misc Assets - Receivable for Securities	PR009 L(1)C(2)	0
(39)	Misc Assets - Aggregate Write-ins for Invested Assets	PR009 L(2)C(2)	0
(40)	Misc Assets - Derivatives	PR009 L(14)C(2)	0
(41)	Replication - Synthetic Asset: One Half	PR010 L(9999999)(7)	0
(42)	Asset Concentration RBC - Equity	PR011 L(33)C(3) Grand Total Page	0
	T	L(27)+L(28)+L(29)+L(30)+L(31)+L(32)+L(33)+L(34)	
			ļ
(42)	Total R2	+L(35)+L(36)+L(37)+L(38)+L(39)+L(40)+L(41)+L(42) +L(43)+L(44)+L(45)+L(46)+L(47)+L(48)+L(49)	
(43)	Total R2	TL(43) TL(44) TL(43) TL(40) TL(47) TL(40) TL(47)	0
R3 - Asse	t Risk - Credit		
(44)	Other Credit RBC	PR012 L(8))-L(1)-L(2)C(2)	0
(45)	One half of Rein Recoverables	0.5 x (PR012 L(1)+L(2)C(2))	0
(46)	Other half of Rein Recoverables	If R4 L(51)>(R3 L(45) + R3 L(46)), 0, otherwise, R3 L(46)	0
(47)	Health Credit Risk	PR013 L(12)C(2)	0
(48)	Total R3	L(45) + L(46) + L(47) + L(48)	0
(40)	1001110	2(10) - 2(10) - 2(11) - 2(10)	L

# CALCULATION OF TOTAL RISK-BASED CAPITAL AFTER COVARIANCE PR032 R4-Reat

			(1)
R4 - Under	rwriting Risk - Reserves	PRBC O&I Reference	RBC Amount
(49)	One half of Reinsurance RBC	If R4 L(51)>(R3 L(45) + R3 L(46)), R3 L(46), otherwise, 0	
(50)	Total Adjusted Unpaid Loss/Expense Reserve RBC	PR0017 L(15)C(20)	
(51)	Excessive Premium Growth - Loss/Expense Reserve	PR016 L(13) C(8)	
(52)	A&H Claims Reserves Adjusted for LCF	PR024 L(5) C(2) + PR023 L(6) C(4)	
(53)	Total R4	L(50)+L(51)+L(52)+L(53)	
R5 - Under	rwriting Risk - Net Written Premium		
(54)	Total Adjusted NWP RBC	PR018 L(15)C(20)	
(55)	Excessive Premium Growth - Written Premiums Charge	PR016 L(14)C(8)	
(56)	Total Net Health Premium RBC	PR022 L(21)C(2)	
(57)	Health Stabilization Reserves	PR025 L(8)C(2) + PR023 L(3) C(2)	
(58)	Total R5	L(551)+L(56)+L(57)+L(58)	
Rcat- Cata	strophe Risk		
(59)	Total Reat	PR027 L(3) C(1)	
(60)	Total RBC After Covariance Before Basic Operational Risk = R0+SQRT(R1^2+R2^2+R3^2+R4^2+R5^2+Rcat^2)		
(61)	BasicOperational Risk = 0.030 x L(61)		
(62)	C-4a of U.S. Life Insurance Subsidiaries (from Company records)		
(63)	Net Basic Operational Risk = Line (62) - Line (63) (Not less than zero)		
(64)	Total RBC After Covariance including Basic Operational Risk = L(61)+ L(64)		
(65)	Authorized Control Level RBC including Basic Operational Risk = .5 x L(65)		<u> </u>