

Example of a treatment of extraterritorial issues in rate filing.

1. The Actuarial Memorandum for the filing included the following “Applicability” section.

This filing is applicable to enforce group long-term care insurance policies issued for delivery (situated) in your state before January 1, 2003, except those certificates issued to residents of other states whose requirements are asserted to apply to rate increases for certificates issued in such other states regardless of group policy situs.

For certificates issued to residents of Utah under a group long-term care insurance policy situated in another state, we will only implement a premium rate schedule increase after we have received approval from your Department and any required approval of the situs state with respect to an increase for the group policy form. For certificates issued to residents of Utah under such a group policy, we will implement the amount of the increase approved by your state irrespective of the amount of the increase implemented in the situs state. These forms are not currently being marketed to new group policyholders.

2. In response to our objection noting some discrepancies in policy counts between some exhibits the company provided the following additional information.

Please note that there are four categories in the Group business due to the complexity introduced by situs state and ET state designation. In the Group business, MetLife has group policies that are situs in Utah as well as group policies issued to residents of Utah that are situs outside of Utah.

The certificate holders count/premiums listed in SERFF include certificates that are:

1. situs in Utah and issued to residents of Utah or other non-ET states; and
2. situs outside Utah but issued to residents of Utah.

Situs State	Issue State	Policy Count	Annualized Px
UT	UT	1,261	1,232,697
UT	Non-UT/Non-ET State	195	219,248
Non-UT	UT	321	326,150
Total		1,777	1,778,095

On the other hand, Exhibit I-B includes certificates that are:

1. situs in Utah and issued to residents of Utah or other non-ET states; and
2. situs in Utah and issued to residents of other ET states.

Situs State	Issue State	Policy Count	Annualized Px
UT	UT	1,261	1,232,697
UT	Non-UT/Non-ET State	195	219,248
UT	Non-UT/ET State	160	161,351
Total		1,616	1,613,296