BONDS PR006

		Annual Statement Source	(1) Long-Term Bonds Schedule D, Part 1 Book/Adjusted Carrying Value L2 thru 26 = Sch D Pt1F	(2) Short-Term Investments Schedule DA, Part 1 Book/Adjusted Carrying Value L2 thru 26 = Sch DA Pt1F	(3) Cash Equivalents Schedule E, Part 2 Book/Adjusted Carrying Value L2 thr 26 = Sch E Pt2F	(4) Subtotal C(1) + C(2) + C(3)	Factor	(5) RBC Requirement
(1)	NAIC 1.A - U.S. Government Full Faith and Credit, Other U.S. Government Obligations, and NAIC U.S. Government Money Market Fund List (Refer to A/S Instructions)	C(1)=Sch D, Pt 1, C11 L0599999 C(2)=Sch DA, Pt 1, C7 L0599999 C(3)=Sch E, Pt 2, C7 L0599999 + L8599999	0	0	0	0	0.000	0
(2)	NAIC Designation Category 1.A	Footnote Amt 1 L000001A- L(1)	0	0	0	0	0.002	0
(3)	NAIC Designation Category 1.B	Footnote Amt 2 L000001A	0	0	0	0	0.004	0
(4)	NAIC Designation Category 1.C	Footnote Amt 3 L000001A	0	0	0	0	0.006	0
(5)	NAIC Designation Category 1.D	Footnote Amt 4 L000001A	0	0	0	0	0.008	0
(6)	NAIC Designation Category 1.E	Footnote Amt 5 L000001A	0	0	0	0	0.010	0
(7)	NAIC Designation Category 1.F	Footnote Amt 6 L000001A	0	0	0	0	0.013	0
(8)	NAIC Designation Category 1.G	Footnote Amt 7 L000001A	0	0	0	0	0.015	0
(9)	Total NAIC 01 Bonds	Sum of Ls (1) through (8)	0	0	0	0		0
(10)	NAIC Designation Category 2.A	Footnote Amt 1 L000001B	0	0	0	0	0.018	0
(11)	NAIC Designation Category 2.B	Footnote Amt 2 L000001B	0	0	0	0	0.021	0
(12)	NAIC Designation Category 2.C	Footnote Amt 3 L000001B	0	0	0	0	0.025	0
(13)	Total NAIC 02 Bonds	Sum of Ls (10) through (12)	0	0	0	0		0
(14)	NAIC Designation Category 3.A	Footnote Amt 1 L000001C	0	0	0	0	0.055	0
(15)	NAIC Designation Category 3.B	Footnote Amt 2 L000001C	0	0	0	0	0.060	0
(16)	NAIC Designation Category 3.C	Footnote Amt 3 L000001C	0	0	0	0	0.066	0
(17)	Total NAIC 03 Bonds	Sum of Ls (14) through (16)	0	0	0	0		0
(18)	NAIC Designation Category 4.A	Footnote Amt 1 L000001D	0	0	0	0	0.071	0
(19)	NAIC Designation Category 4.B	Footnote Amt 2 L000001D	0	0	0	0	0.077	0
(20)	NAIC Designation Category 4.C	Footnote Amt 3 L000001D	0	0	0	0	0.087	0
(21)	Total NAIC 04 Bonds	Sum of Ls (18) through (20)	0	0	0	0		0
(22)	NAIC Designation Category 5.A	Footnote Amt 1 L000001E	0	0	0	0	0.098	0
(23)	NAIC Designation Category 5.B	Footnote Amt 2 L000001E	0	0	0	0	0.109	0
(24)	NAIC Designation Category 5.C	Footnote Amt 3 L000001E	0	0	0	0	0.120	0
(25)	Total NAIC 05 Bonds	Sum of Ls (22) through (24)	0	0	0	0		0
(26)	Total NAIC 06 Bonds	Footnote Amt 1 L000001F	0	0	0	0	0.300	0
(27)	Subtotal - Bonds Subject to Bond Size Factor	L(9) - L(1) + L(13) + L(17) + L(21) + L(25) + L(26)	0	0	0	0		0
(28)	Number of Issuers		0	0	0	0		
(29)	Bond Size Factor							6.800
(30)	Bond Size Factor RBC	C(5)L(27) x C(5)L(29)						0
(31)	Total Bonds RBC	L(27) + L(30)						0

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UNAFFILIATED PREFERRED AND COMMON STOCK ~~AND HYBRID SECURITIES~~ PR007

	Unaffiliated Preferred Stock	Annual Statement Source	(1) Book/Adjusted Carrying Value	Factor	(2) 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 (should equal P2 L2.1 C3 less Sch D-Sum C1 L18)	Sum of Ls(1) through (6)	0		0
	Unaffiliated Common Stock				
(8)	Total Common Stock	Sch D - Summary C1 L25	0		
(9)	Affiliated Common Stock	Sch D - Summary C1 L24	0		
(10)	Non-Admitted Unaffiliated Common Stock	P2 C2 L2.2 - Sch D Pt6 Sn1 C10 L1899999	0		
(11)	Admitted Unaffiliated Common Stock	**L(8) - L(9) - L(10)**	0	0.150	0
(12)	Fair Value Excess Affiliated Common Stock	PR003 C(14) L(9999999)			0
(13)	Total Unaffiliated Common Stock	**L(11) + L(12)**	0		0

MISCELLANEOUS ASSETS PR009

		Annual Statement Source	(1) Book/Adjusted Carrying Value	Factor	(2) RBC Requirement
(1)	Receivable for Securities	P2C3L9	0	0.025	0
(2)	Aggregate W/I for Invest Assets	P2C3 L11	0	0.050	0
(3)	Cash	P2 L5, inside amt 1	0	0.003	0
(4)	Cash Equivalents	P2 L5, inside amt 2	0		
(5)	**Less: Cash Equivalents, Total Bonds**	Sch E Pt 2 C7 L8399999	0		
(6)	**Less: Exempt Money Market Mutual Funds as Identified by SVO**	Sch E Pt 2 C7 L8599999	0		
(7)	Net Cash Equivalents	L(4)-L(5)-L(6)	0	0.003	0
(8)	Short-Term Investments	P2 L5, inside amt 3	0		
(9)	**Short-Term Bonds**	Sch DA Pt 1 C7 L8399999	0		
(10)	Total Other Short-Term Investments	L(8)-L(9)	0	0.003	0
(11)	Collateral Loans	Sch BA Pt1 C12 L2999999+3099999	0		
(12)	Less: Non-Admitted Collateral Loans	P2 L8 C2 in part	0		
(13)	Net Admitted Collateral Loans	L(11) - L(12)	0	0.050	0
(14)	Derivatives	P2C3 L7	0	0.050	0
(15)	Total Miscellaneous Assets	L(1)+L(2)+L(3)+L(7)+L(10)+L(13)+L(14)	0		0

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ASSET CONCENTRATION PR011

		(1)	(2)		(3)
	ISSUER #1		Book/Adjusted Carrying Value	Factor	Additional RBC
(1)	NAIC Designation Category 2.A Bonds		0	0.0180	0
(2)	NAIC Designation Category 2.B Bonds		0	0.0210	0
(3)	NAIC Designation Category 2.C Bonds		0	0.0250	0
(4)	NAIC Designation Category 3.A Bonds		0	0.0550	0
(5)	NAIC Designation Category 3.B Bonds		0	0.0600	0
(6)	NAIC Designation Category 3.C Bonds		0	0.0660	0
(7)	NAIC Designation Category 4.A Bonds		0	0.0710	0
(8)	NAIC Designation Category 4.B Bonds		0	0.0770	0
(9)	NAIC Designation Category 4.C Bonds		0	0.0870	0
(10)	NAIC Designation Category 5.A Bonds		0	0.0980	0
(11)	NAIC Designation Category 5.B Bonds		0	0.1090	0
(12)	NAIC Designation Category 5.C Bonds		0	0.1200	0
(13)	Collateral Loans		0	0.0500	0
(14)	Mortgage Loans		0	0.0500	0
(15)	NAIC 02 Working Capital Finance Investments		0	0.0125	0
(16)	Federal Guaranteed Low Income Housing Tax Credits		0	0.0014	0
(17)	Federal Non-Guaranteed Low Income Housing Tax Credits		0	0.0260	0
(18)	State Guaranteed Low Income Housing Tax Credits		0	0.0014	0
(19)	State Non-Guaranteed Low Income Housing Tax Credits		0	0.0260	0
(20)	All Other Low Income Housing Tax Credits		0	0.1500	0
(21)	SUBTOTAL - FIXED INCOME		0		0
(22)	NAIC 02 Unaffiliated Preferred Stock		0	0.0100	0
(23)	NAIC 03 Unaffiliated Preferred Stock		0	0.0200	0
(24)	NAIC 04 Unaffiliated Preferred Stock		0	0.0450	0
(25)	NAIC 05 Unaffiliated Preferred Stock		0	0.1000	0
(26)	Property Held For Production of Income or For Sale Excluding Home Office		0	0.1000	0
(27)	Property Held For Production of Income or For Sale Encumbrances Excluding Home Office		0	0.1000	0
(28)	Schedule BA Assets		0	0.1000	0
(29)	Receivable for Securities		0	0.0250	0
(30)	Aggregate Write-Ins for Invested Assets		0	0.0500	0
(31)	Derivatives		0	0.0500	0
(32)	Unaffiliated Common Stock		0	0.1500	0
(33)	SUBTOTAL - EQUITY		0		0
(34)	TOTAL - ISSUER #1 (L21+L33)		0		0

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OFF-BALANCE SHEET COLLATERAL AND SCHEDULE DL, PART 1 ASSETS PR015

	Asset Category	Annual Statement Source	(1) Off-Balance Sheet Collateral Book/Adjusted Carrying Value	(2) Schedule DL, Part 1 Book/Adjusted Carrying Value	(3) Subtotal	Factor	(4) RBC Requirement
	Fixed Income Assets						
	Bonds						
(1)	**NAIC 1.A - U.S. Government Full Faith and Credit, Other U.S. Government Obligations, and NAIC U.S. Government Money Market Fund List (Refer to A/S Instructions)**	Company Records	0	0	0	0.000	0
(2)	NAIC Designation Category 1.A	Company Records	0	0	0	0.002	0
(3)	NAIC Designation Category 1.B	Company Records	0	0	0	0.004	0
(4)	NAIC Designation Category 1.C	Company Records	0	0	0	0.006	0
(5)	NAIC Designation Category 1.D	Company Records	0	0	0	0.008	0
(6)	NAIC Designation Category 1.E	Company Records	0	0	0	0.010	0
(7)	NAIC Designation Category 1.F	Company Records	0	0	0	0.013	0
(8)	NAIC Designation Category 1.G	Company Records	0	0	0	0.015	0
(9)	Total NAIC 01 Bonds	Sum of Ls (1) through (8)	0	0	0		0
(10)	NAIC Designation Category 2.A	Company Records	0	0	0	0.018	0
(11)	NAIC Designation Category 2.B	Company Records	0	0	0	0.021	0
(12)	NAIC Designation Category 2.C	Company Records	0	0	0	0.025	0
(13)	Total NAIC 02 Bonds	Sum of Ls (10) through (12)	0	0	0		0
(14)	NAIC Designation Category 3.A	Company Records	0	0	0	0.055	0
(15)	NAIC Designation Category 3.B	Company Records	0	0	0	0.060	0
(16)	NAIC Designation Category 3.C	Company Records	0	0	0	0.066	0
(17)	Total NAIC 03 Bonds	Sum of Ls (14) through (16)	0	0	0		0
(18)	NAIC Designation Category 4.A	Company Records	0	0	0	0.071	0
(19)	NAIC Designation Category 4.B	Company Records	0	0	0	0.077	0
(20)	NAIC Designation Category 4.C	Company Records	0	0	0	0.087	0
(21)	Total NAIC 04 Bonds	Sum of Ls (18) through (20)	0	0	0		0
(22)	NAIC Designation Category 5.A	Company Records	0	0	0	0.098	0
(23)	NAIC Designation Category 5.B	Company Records	0	0	0	0.109	0
(24)	NAIC Designation Category 5.C	Company Records	0	0	0	0.120	0
(25)	Total NAIC 05 Bonds	Sum of Ls (22) through (24)	0	0	0		0
(26)	Total NAIC 06 Bonds	Company Records	0	0	0	0.300	0
(27)	Total Bonds	**L(9) + (13) + (17) + (21) + (25) + (26)**	0	0	0		0
	Equity Assets						
	Preferred Stock - Unaffiliated						
(28)	NAIC 01 Unaffiliated Preferred Stock	Company Records	0	0	0	0.003	0
(29)	NAIC 02 Unaffiliated Preferred Stock	Company Records	0	0	0	0.010	0
(30)	NAIC 03 Unaffiliated Preferred Stock	Company Records	0	0	0	0.020	0
(31)	NAIC 04 Unaffiliated Preferred Stock	Company Records	0	0	0	0.045	0
(32)	NAIC 05 Unaffiliated Preferred Stock	Company Records	0	0	0	0.100	0
(33)	NAIC 06 Unaffiliated Preferred Stock	Company Records	0	0	0	0.300	0
(34)	Total Unaffiliated Preferred Stock	Sum of Ls (28) through (33)	0	0	0		0
(35)	Unaffiliated Common Stock	Company Records	0	0	0	0.150	0
(36)	Real Estate and Schedule BA - Other Invested Assets	Company Records	0	0	0	0.200	0
(37)	Other Invested Assets	Company Records	0	0	0	0.200	0
(38)	Mortgage Loans on Real Estate	Company Records	0	0	0	0.050	0
(39)	**Cash, Cash Equivalents and Short-Term Investments** (Not reported as Bonds above)	Company Records	0	0	0	0.003	0
(40)	Total	**L(27)+L(34)+L(35)+L(36)+L(37)+L(38)+L(39)**	0	0	0		0

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

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

			(1)
R0 –-Subsidiary Insurance Companies and Misc. Other Amounts		PRBC O&I Reference	RBC Amount
(1)	Affiliated US P&C Insurers - Directly Owned	PR004 L(1)C(4)	0
(2)	Affiliated US P&C Insurers - Indirectly Owned	PR004 L(4)C(4)	0
(3)	Affiliated US Life Insurers - Directly Owned	PR004 L(2)C(4)	0
(4)	Affiliated US Life Insurers - Indirectly Owned	PR004 L(5)C(4)	0
(5)	Affiliated US Health Insurer - Directly Owned	PR004 L(3)C(4)	0
(6)	Affiliated US Health Insurer - Indirectly Owned	PR004 L(6)C(4)	0
(7)	Affiliated Alien Insurers - Directly Owned	PR004 L(8)C(4)	0
(8)	Affiliated Alien Insurers - Indirectly Owned	PR004 L(9)C(4)	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 - Asset 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, Cash Equi, non-govt MMF & S.T. Invest 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

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

Attachment D

R2 - Asset Risk - Equity		PRBC O&I Reference	RBC Amount
(27)	Common - Affiliate Investment Subsidiary	PR004 L(7)C(2)	0
(28)	Common - Affiliate Hold. Company. in excess of Ins. Subs.	PR004 L(10)C(2)	0
(29)	Common - Investment in Parent	PR004 L(11)C(2)	0
(30)	Common - Aff'd US P&C Not Subj to RBC	PR004 L(12)C(2)	0
(31)	Common - Affil US Life Not Subj to RBC	PR004 L(13)C(2)	0
(32)	Common - Affil US Health Insurer Not Subj to RBC	PR004 L(14)C(2)	0
(33)	Common - Aff'd Non-insurer	PR004 L(15)C(2)	0
(34)	Preferred - Aff'd Invest Sub	PR004 L(7)C(3)	0
(35)	Preferred - Aff'd Hold. Co. in excess of Ins. Subs.	PR004 L(10)C(3)	0
(36)	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
(40)	Preferred - Affil Non-insurer	PR004 L(15)C(3)	0
(41)	Unaffiliated Preferred Stock	PR007 L(7)C(2)+PR015 L(34)C(4)	0
(42)	Unaffiliated Common Stock	PR007 L(21)C(2)+PR015 L(35)C(4)	0
(43)	Other Long -Term Assets - Real Estate	PR008 L(7)C(2)	0
(44)	Other Long-Term Assets - Schedule BA Assets	PR008 L(19)C(2)+PR015 L(36)+L(37)C(4)	0
(45)	Misc Assets - Receivable for Securities	PR009 L(1)C(2)	0
(46)	Misc Assets - Aggregate Write-ins for Invested Assets	PR009 L(2)C(2)	0
(47)	Misc Assets - Derivatives	PR009 L(14)C(2)	0
(48)	Replication - Synthetic Asset: One Half	PR010 L(9999999)(7)	0
(49)	Asset Concentration RBC - Equity	PR011 L(34)C(3) Grand Total Page	0
(50)	Total R2	**L(27)+L(28)+L(29)+L(30)+L(31)+L(32)+L(33)+L(34) +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)**	0
R3 - Asset Risk - Credit			
(51)	Other Credit RBC	PR012 L(8))-L(1)-L(2)C(2)	0
(52)	One half of Rein Recoverables	0.5 x (PR012 L(1)+L(2)C(2))	0
(53)	Other half of Rein Recoverables	**If R4 L(57)>(R3 L(51) + R3 L(52)), 0, otherwise, R3 L(52)**	0
(54)	Health Credit Risk	PR013 L(12)C(2)	0
(55)	Total R3	**L(51) + L(52) + L(53) + L(54)**	0

CALCULATION OF TOTAL RISK-BASED CAPITAL AFTER COVARIANCE PR032 R4-Rcat

			(1)
R4 - Underwriting Risk - Reserves		PRBC O&I Reference	RBC Amount
(56)	One half of Reinsurance RBC	If R4 L(57)>(R3 L(51) + R3 L(52)), R3 L(52), otherwise, 0	0
(57)	Total Adjusted Unpaid Loss/Expense Reserve RBC	PR0017 L(15)C(20)	0
(58)	Excessive Premium Growth - Loss/Expense Reserve	PR016 L(13) C(8)	0
(59)	A&H Claims Reserves Adjusted for LCF	PR024 L(5) C(2) + PR023 L(6) C(4)	0
(60)	Total R4	**L(56)+L(57)+L(58)+L(59)**	0
R5 - Underwriting Risk - Net Written Premium			
(61)	Total Adjusted NWP RBC	PR018 L(15)C(20)	0
(62)	Excessive Premium Growth - Written Premiums Charge	PR016 L(14)C(8)	0
(63)	Total Net Health Premium RBC	PR022 L(21)C(2)	0
(64)	Health Stabilization Reserves	PR025 L(8)C(2) + PR023 L(3) C(2)	0
(65)	Total R5	**L(61)+L(62)+L(63)+L(64)**	0

Rcat- Catastrophe Risk			
(66)	Total Rcat	PR027 L(3) C(1)	0

(67)	Total RBC After Covariance Before Basic Operational Risk = R0+SQRT(R1^2+R2^2+R3^2+R4^2+R5^2+Rcat^2)	0

(68)	**Basic Operational Risk = 0.030 x L(67)**	0
(69)	C-4a of U.S. Life Insurance Subsidiaries (from Company records)	0
(70)	**Net Basic Operational Risk = Line (68) - Line (69) (Not less than zero)**	0
(71)	**Total RBC After Covariance including Basic Operational Risk = L(67)+ L(68)**	0

(72)	**Authorized Control Level RBC including Basic Operational Risk = .5 x L(71)**	0

P&C Bond Based Risk Factors

NAIC Designation Category	1A	1B	1C	1D	1E	1F	1G	2A	2B	2C	3A	3B	3C	4A	4B	4C	5A	5B	5C	6
Current (2020)	0.3%	0.3%	0.3%	0.3%	0.3%	0.3%	0.3%	1.0%	1.0%	1.0%	2.0%	2.0%	2.0%	4.5%	4.5%	4.5%	10.0%	10.0%	10.0%	30.0%
AAA Proposed	0.2%	0.4%	0.6%	0.8%	1.0%	1.3%	1.5%	1.8%	2.1%	2.5%	5.5%	6.0%	6.6%	7.1%	7.7%	8.7%	9.8%	10.9%	12.0%	30.0%
% Change	-33.3%	33.3%	100.0%	166.7%	233.3%	333.3%	400.0%	80.0%	110.0%	150.0%	175.0%	200.0%	230.0%	57.8%	71.1%	93.3%	-2.0%	9.0%	20.0%	0.0%

Bond size factor proposed by Academy

Size band	Issuers	Factor
Up To	10	7.8
Next	90	1.75
Next	100	1
Next	300	0.8
Over	500	0.75

Current Bond size factor

Size band	Issuers	Factor
Up To	50	2.5
Next	50	1.3
Next	300	1
Over	400	0.9

2020 RBC Charges by Company Size - Current verse Proposed (Academy) Bond RBC Charges (with Reclassification of Hybrid Securities)

(Excluding Companies with Negative TAC)

($ Thousand)

TAC Size	0 - $5M	$5M - $25M	$25M - $75M	$75M - $250M	$250M - $1B	Over $1B	Total
Total Adjusted Capital	634,515	9,592,253	26,021,963	57,842,654	127,266,401	900,864,013	1,122,221,799
R0 - Current	40,467	37,368	252,348	830,601	4,792,734	68,871,235	74,824,752
R1 - Current (2020)	6,565	88,490	270,047	693,554	1,381,778	7,075,649	9,516,083
R1 - Proposed	15,834	255,738	725,539	1,700,910	2,995,355	12,818,902	18,512,278
R1 % Change	141.2%	189.0%	168.7%	145.2%	116.8%	81.2%	94.5%
R2 - Current (2020)	25,735	300,449	817,152	2,414,346	9,015,861	147,090,396	159,663,940
R2 - Proposed	25,735	299,908	815,827	2,410,391	9,008,641	147,055,400	159,615,903
R2 % Change	0.0%	-0.2%	-0.2%	-0.2%	-0.1%	0.0%	0%
R3 - Current	65,217	255,098	814,397	1,444,880	1,908,922	5,759,927	10,248,440
R4 - Current	383,941	740,177	2,343,271	7,423,651	19,030,888	98,396,748	128,318,675
R5 - Current	82,454	870,870	2,008,636	6,130,150	12,540,378	55,447,500	77,079,987
Rcat	4,268	293,618	1,035,798	2,373,169	5,750,623	45,165,271	54,622,745
ACL RBC - Current	266,814	898,288	2,561,218	7,037,246	18,039,209	155,532,161	184,334,936
ACL RBC - Proposed	268,107	931,600	2,634,848	7,152,488	18,155,000	155,815,086	184,957,128
ACL RBC % Change	0.5%	3.7%	2.9%	1.6%	0.6%	0.2%	0.3%
# of Companies	238	750	566	422	260	145	2,381

TAC Size	0 - $5M	$5M - $25M	$25M - $75M	$75M - $250M	$250M - $1B	Over $1B	Total
Current R1	6,565	88,490	270,047	693,554	1,381,778	7,075,649	9,516,083
R1 (Proposed Base Factor only)	11,128	175,257	558,089	1,421,868	2,763,457	12,737,708	17,667,507
Change from Current R	4,563	86,767	288,042	728,314	1,381,679	5,662,059	8,151,423
% Change from Current R1	69%	98%	107%	105%	100%	80%	86%
R1 (Proposed Base Factor and BSAF)	15,834	255,738	725,539	1,700,910	2,995,355	12,818,902	18,512,278
Additional Change	4,706	80,481	167,450	279,042	231,898	81,194	844,771
% Change from Current R1	71.7%	90.9%	62.0%	40.2%	16.8%	1.1%	9%

Distributions of Change in R1 Charges by Company Size under Proposed (Academy) Bond RBC Charges (with Reclassification of Hybrid Securities)

(Excluding Companies with Negative TAC)

R1 % Change\TAC	0 - $5M	$5M - $25M	$25M - $75M	$75M - $250M	$250M - $1B	Over $1B	Total
Less than -50%	4	3	3	0	0	0	10
-50% to -25%	2	5	0	2	0	0	9
-25% to -15%	0	3	0	2	0	0	5
-15% to -5%	5	9	5	1	0	0	20
-5% to 5%	106	120	34	5	6	4	275
5% to 15%	2	5	3	1	1	1	13
15% to 25%	2	3	5	0	1	0	11
25% to 50%	2	15	8	7	5	10	47
Greater than 50%	115	587	508	404	247	130	1,991
Total	238	750	566	422	260	145	2,381

Attachment D

Distributions of Changes in ACL RBC by Company Size under Proposed (Academy) Bond RBC Charges (with Reclassification of Hybrid Securities)

(Excluding Companies with Negative TAC)

ACL RBC % Change\TAC	0 - $5M	$5M - $25M	$25M - $75M	$75M - $250M	$250M - $1B	Over $1B	Total
Less than -50%	2	2	0	0	0	0	4
-50% to -25%	1	0	0	0	0	0	1
-25% to -15%	0	0	0	0	0	0	0
-15% to -5%	1	0	2	0	0	0	3
-5% to 5%	3	22	16	11	4	0	56
5% to 15%	203	478	383	320	232	142	1,758
15% to 25%	7	47	32	20	10	1	117
25% to 50%	2	26	14	17	3	0	62
Greater than 50%	19	175	119	54	11	2	380
Total	238	750	566	422	260	145	2,381

Distributions of Changes in RBC Ratios by Company Size under Proposed (Academy) Bond RBC Charges (with Reclassification of Hybrid Securities)

(Excluding Companies with Negative TAC)

RBC Ratio % Change\TAC	0 - $5M	$5M - $25M	$25M - $75M	$75M - $250M	$250M - $1B	Over $1B	Total
Less than -50%	16	136	82	28	7	2	271
-50% to -25%	5	55	46	36	6	0	148
-25% to -15%	2	22	18	12	4	0	58
-15% to -5%	8	55	31	25	9	1	129
-5% to 5%	203	480	387	321	234	142	1,767
5% to 15%	1	0	2	0	0	0	3
15% to 25%	0	0	0	0	0	0	0
25% to 50%	1	0	0	0	0	0	1
Greater than 50%	2	2	0	0	0	0	4
Subtotal	238	750	566	422	260	145	2,381

2020 P&C RBC - Comparison of Action Levels by Company Size Between Current and Proposed (Academy) Bonds RBC Charges (with Reclassification of Hybrid Securities)

(Excluding Companies with Negative TAC)

		2020 RBC Action Level under Current RBC Formula						
		MCL	ACL	RAL	CAL	Trend Test	No Action	Total
RBC Action Level with Academy Proposed Bond RBC Charges and Reclassification of Hybrid Securities	MCL	9						9
	ACL		2					2
	RAL			4				4
	CAL				14			14
	Trend Test					21	1	22
	No Action						2,330	2,330
	Total	9	2	4	14	21	2,331	2,381

Attachment D

2020 P&C RBC
Industrywide Reported Book Adjusted Carrying Value on Bond Investment (Excluding U S Government Bonds)
(PR006 & PR015)

Category	BACV	Percentage	Current Risk Factor	Proposed Rosl Factor	% Change in risk factor
1A	255,703,383,562	27.1%	0.003	0.002	-33.3%
1b	63,666,739,646	6.7%	0.003	0.004	33.3%
1C	81,152,983,206	8.6%	0.003	0.006	100.0%
1D	83,707,799,486	8.9%	0.003	0.008	166.7%
1E	53,762,688,175	5.7%	0.003	0.010	233.3%
1F	88,813,399,627	9.4%	0.003	0.013	333.3%
1G	64,846,819,508	6.9%	0.003	0.015	400.0%
2A	76,354,389,147	8.1%	0.010	0.018	80.0%
2B	72,711,346,719	7.7%	0.010	0.021	110.0%
2C	46,811,089,487	5.0%	0.010	0.025	150.0%
3A	9,568,228,547	1.0%	0.020	0.055	175.0%
3B	9,318,628,752	1.0%	0.020	0.060	200.0%
3C	10,726,858,935	1.1%	0.020	0.066	230.0%
4A	5,433,699,582	0.6%	0.045	0.071	57.8%
4B	11,598,731,578	1.2%	0.045	0.077	71.1%
4C	5,367,195,481	0.6%	0.045	0.087	93.3%
5A	1,567,651,355	0.2%	0.100	0.098	-2.0%
5B	3,018,927,015	0.3%	0.100	0.109	9.0%
5C	332,366,273	0.0%	0.100	0.120	20.0%
6	575,169,235	0.1%	0.300	0.300	0.0%
Total	945,038,095,316	100.0%			