

State: Pennsylvania **Filing Company:** The Prudential Insurance Company of America
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Individual Long Term Care Insurance
Project Name/Number: ILTC-2 Re-Rate/5I-2015

Filing at a Glance

Company: The Prudential Insurance Company of America
Product Name: Individual Long Term Care Insurance
State: Pennsylvania
TOI: LTC03I Individual Long Term Care
Sub-TOI: LTC03I.001 Qualified
Filing Type: Rate - G.I. (Guaranteed Issue)
Date Submitted: 01/12/2016
SERFF Tr Num: PRUD-130397957
SERFF Status: Assigned
State Tr Num: PRUD-130397957
State Status: Received Review in Progress
Co Tr Num: IIGHILTC2RERATE-RP-PA

Implementation: On Approval
Date Requested:
Author(s): Laura Hughes, Raenonna Ransom
Reviewer(s): Jim Laverty (primary)
Disposition Date:
Disposition Status:
Implementation Date:

State Filing Description:
 Proposed aggregate 13.4% rate increase (29.2% for cash/unlimited BP, 16.7% cash/limited BP, 25.1% reimbursement/unlimited BP, and 8.4% reimbursement/limited BP) on 387 PA policyholders of Prudential forms GRP 112687 & GRP 112685 (known as Series ILTC-2).

State: Pennsylvania **Filing Company:** The Prudential Insurance Company of America
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General Information

Project Name: ILTC-2 Re-Rate	Status of Filing in Domicile: Pending
Project Number: 5I-2015	Date Approved in Domicile:
Requested Filing Mode: Review & Approval	Domicile Status Comments: Filed Concurrently.
Explanation for Combination/Other:	Market Type: Individual
Submission Type: New Submission	Individual Market Type:
Overall Rate Impact:	Filing Status Changed: 01/12/2016
	State Status Changed: 01/20/2016
Deemer Date:	Created By: Raenonna Ransom
Submitted By: Raenonna Ransom	Corresponding Filing Tracking Number:

Filing Description:

Please refer to the Filing Cover Letter attached to the Supporting Documentation Tab of this filing.

Company and Contact

Filing Contact Information

Keith Burns, Director and Actuary	Kieth.Burns@Prudential.com
ROS3	402-934-4280 [Phone]
Roseland, NJ 11111	

Filing Company Information

The Prudential Insurance	CoCode: 68241	State of Domicile: New Jersey
Company of America	Group Code: 304	Company Type: Life
751 Broad Street	Group Name:	State ID Number:
Newark, NJ 07102-3777	FEIN Number: 22-1211670	
(973) 802-6000 ext. [Phone]		

Filing Fees

Fee Required?	No
Retaliatory?	No
Fee Explanation:	

SERFF Tracking #:

PRUD-130397957

State Tracking #:

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Company Tracking #:

IIGHILTC2RERATE-RP-PA

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Rate Information

Rate data applies to filing.

Filing Method: SERFF

Rate Change Type: Increase

Overall Percentage of Last Rate Revision: 20.000%

Effective Date of Last Rate Revision: 05/01/2014

Filing Method of Last Filing: SERFF

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
The Prudential Insurance Company of America	13.400%	13.400%	\$143,008	387	\$1,067,224	29.200%	8.400%

SERFF Tracking #:

PRUD-130397957

State Tracking #:

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IIGHILTC2RERATE-RP-PA

State:

Pennsylvania

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The Prudential Insurance Company of America

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LTC03I Individual Long Term Care/LTC03I.001 Qualified

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Individual Long Term Care Insurance

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ILTC-2 Re-Rate/5I-2015

Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		Appendix F - Rate Pages (ILTC-2)	GRP 112687 & GRP 112685	Revised	Previous State Filing Number: PRUD-129010828 Percent Rate Change Request: 16.8	PA - Appendix F - Rate Pages (ILTC2) - 1-2016.pdf,

Appendix F
The Prudential Insurance Company of America
Individual Long Term Care Insurance Plan
Base Rates and Adjustment Factors

GRP 112687 & GRP 112685
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PENNSYLVANIA BASE RATES BEFORE ADJUSTMENTS					
Gross Annual Standard Unmarried (Single) Premium Per \$10.00 of Institutional Care Daily Benefit					
Home Care Daily Benefit: 100% of Institutional Care Daily Benefit					
\$1,825 x Daily Benefit Lifetime Maximum Benefit (5 Year Benefit Period)					
90 Day Elimination Period					
Lifetime Premium Payment Option					
Inflation Option					
Issue Age	None	Guaranteed Purchase Option	5% Automatic Simple	5% Automatic Compound (2x Maximum)	5% Automatic Compound (No Maximum)
18-30	54.85	58.97	89.96	56.05	127.63
31	55.46	59.63	90.96	58.38	129.05
32	56.05	60.29	91.97	60.73	130.47
33	56.67	60.93	92.96	63.06	131.88
34	57.28	61.59	93.97	65.40	133.30
35	57.89	62.24	94.97	67.73	134.72
36	58.49	62.90	95.96	70.06	136.14
37	59.11	63.57	96.95	72.40	137.56
38	59.71	64.21	97.96	74.73	138.96
39	60.31	64.87	98.96	77.06	140.38
40	60.93	65.52	99.97	79.40	141.80
41	62.48	67.20	103.67	83.34	147.35
42	64.04	68.87	107.44	87.36	153.02
43	65.59	70.55	111.25	91.42	158.75
44	67.16	72.22	115.10	95.57	164.63
45	68.71	73.89	119.02	99.77	170.59
46	70.28	75.57	123.01	104.01	176.68
47	71.83	77.24	127.03	108.33	182.87
48	73.40	78.92	131.11	112.73	189.15
49	74.95	80.58	135.24	117.17	195.54
50	76.51	82.28	139.45	121.68	202.05
51	81.91	88.08	147.90	130.65	210.26
52	87.32	93.90	156.30	139.54	218.37
53	92.71	99.70	164.62	148.35	226.32
54	98.11	105.51	172.83	157.06	234.15
55	103.52	111.31	180.98	165.70	241.87
56	108.92	117.13	189.04	174.25	249.45
57	114.31	122.93	197.01	182.72	256.89
58	119.73	128.74	204.92	191.09	264.18
59	125.12	134.54	212.71	199.37	271.36
60	130.54	140.36	220.44	207.56	278.41
61	141.62	152.28	236.68	226.62	296.12
62	152.71	164.22	250.25	243.51	310.38
63	163.80	176.14	263.51	260.07	324.37
64	174.90	188.06	274.22	274.56	335.04
65	186.00	200.00	298.09	298.79	363.13
66	208.08	223.74	331.41	332.48	394.53
67	230.17	247.49	364.73	366.20	425.31
68	252.25	271.23	398.06	399.91	455.38
69	274.32	294.98	431.37	433.61	484.79
70	296.42	318.72	464.69	467.32	513.53
71	337.32	362.72	523.14	529.61	572.24
72	378.23	406.71	581.58	591.92	630.95
73	419.14	450.69	640.03	654.23	689.67
74	460.06	494.69	698.45	716.53	748.37
75	500.97	538.68	756.90	778.83	807.09
76	570.12	613.05	852.10	876.76	899.36
77	639.28	687.41	947.30	974.69	991.64
78	708.43	761.77	1,042.48	1,072.61	1,083.90
79	777.59	836.12	1,137.68	1,170.54	1,176.18
80	846.73	910.48	1,232.89	1,268.46	1,268.46
81	963.61	1,036.14	1,385.02	1,413.49	1,413.49
82	1,080.49	1,161.82	1,537.17	1,558.51	1,558.51
83	1,197.36	1,287.49	1,689.31	1,703.54	1,703.54
84	1,314.23	1,413.17	1,841.46	1,848.57	1,848.57

Pennsylvania Rates
April 1, 2016

Appendix F
The Prudential Insurance Company of America
Individual Long Term Care Insurance Plan
Base Rates and Adjustment Factors

GRP 112687 & GRP 112685
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Adjustment Factors - Policy Benefit Options						
Lifetime Maximum (Benefit Period)		Elimination Period			Home and Community Based Care Daily Benefit	
Benefit Period		Elimination Period	Service Day Definition	Calendar Day Definition	HHC % of Institutional Benefit	
2 YEAR	0.73	30 DAY*	1.14	1.15		
3 YEAR	0.82	60 DAY	1.08	1.10	50%	0.93
4 YEAR*	0.91	90 DAY	1.00	1.04	75%	0.97
5 YEAR*	1.00	180 DAY	0.91	0.93	100%	1.00
UNLIMITED*	1.48					

* Note available for issue ages 80 - 84

Adjustment Factors - Monthly Benefit Rider					
Inflation Option					
HHC % of Institutional Benefit	None	Guaranteed Purchase Option	5% Automatic Simple	5% Automatic Compound (2x Maximum)	5% Automatic Compound (No Maximum)
50%	1.070	1.070	1.075	1.100	1.100
75%	1.053	1.053	1.058	1.088	1.088
100%	1.035	1.035	1.040	1.075	1.075

Adjustment factors - Cash Benefit Rider							
Issue Ages	HHC % of Institutional Benefit	Benefit Period	Inflation Option				
			None	Guaranteed Purchase Option	5% Automatic Simple	5% Automatic Compound (2x Maximum)	5% Automatic Compound (No Maximum)
18 - 64	50%	2	1.378	1.378	1.400	1.464	1.464
		3	1.464	1.464	1.486	1.550	1.550
		4	1.550	1.550	1.572	1.636	1.636
		5	1.636	1.636	1.658	1.712	1.712
		Unlimited	1.807	1.807	1.838	1.890	1.890
	75%	2	1.550	1.550	1.583	1.679	1.679
		3	1.636	1.636	1.669	1.766	1.766
		4	1.712	1.712	1.755	1.852	1.852
		5	1.798	1.798	1.841	1.938	1.938
		Unlimited	1.983	1.983	2.024	2.128	2.128
	100%	2	1.701	1.701	1.766	1.884	1.884
		3	1.787	1.787	1.852	1.970	1.970
4		1.873	1.873	1.938	2.056	2.056	
5		1.959	1.959	2.024	2.142	2.142	
Unlimited		2.148	2.148	2.210	2.334	2.334	
65+	50%	2	1.249	1.249	1.281	1.335	1.335
		3	1.335	1.335	1.367	1.421	1.421
		4	1.421	1.421	1.453	1.507	1.507
		5	1.507	1.507	1.529	1.593	1.593
		Unlimited	1.683	1.683	1.704	1.776	1.776
	75%	2	1.421	1.421	1.464	1.561	1.561
		3	1.507	1.507	1.550	1.647	1.647
		4	1.593	1.593	1.636	1.733	1.733
		5	1.679	1.679	1.712	1.819	1.819
		Unlimited	1.859	1.859	1.890	1.993	1.993
	100%	2	1.583	1.583	1.647	1.766	1.766
		3	1.669	1.669	1.733	1.852	1.852
4		1.755	1.755	1.819	1.938	1.938	
5		1.841	1.841	1.895	2.024	2.024	
Unlimited		2.024	2.024	2.086	2.210	2.210	

Adjustment factors - Cash Indemnity Rider							
Issue Ages	HHC % of Institutional	Benefit Period	Inflation Option				
			None	Guaranteed Purchase	5% Automatic Simple	5% Automatic Compound	5% Automatic Compound
18 - 64	50%	2	1.208	1.208	1.220	1.255	1.255
		3	1.255	1.255	1.267	1.303	1.303
		4	1.303	1.303	1.315	1.350	1.350
		5	1.350	1.350	1.362	1.392	1.392
		Unlimited	1.444	1.444	1.461	1.490	1.490
	75%	2	1.303	1.303	1.321	1.373	1.373
		3	1.350	1.350	1.368	1.421	1.421
		4	1.392	1.392	1.415	1.469	1.469
		5	1.439	1.439	1.463	1.516	1.516
		Unlimited	1.541	1.541	1.563	1.620	1.620
	100%	2	1.386	1.386	1.421	1.486	1.486
		3	1.433	1.433	1.469	1.534	1.534
4		1.480	1.480	1.516	1.581	1.581	
5		1.527	1.527	1.563	1.628	1.628	
Unlimited		1.631	1.631	1.666	1.734	1.734	
65+	50%	2	1.137	1.137	1.155	1.184	1.184
		3	1.184	1.184	1.202	1.232	1.232
		4	1.232	1.232	1.249	1.279	1.279
		5	1.279	1.279	1.291	1.326	1.326
		Unlimited	1.376	1.376	1.387	1.427	1.427
	75%	2	1.232	1.232	1.255	1.309	1.309
		3	1.279	1.279	1.303	1.356	1.356
		4	1.326	1.326	1.350	1.403	1.403
		5	1.373	1.373	1.392	1.450	1.450
		Unlimited	1.472	1.472	1.490	1.546	1.546
	100%	2	1.321	1.321	1.356	1.421	1.421
		3	1.368	1.368	1.403	1.469	1.469
4		1.415	1.415	1.450	1.516	1.516	
5		1.463	1.463	1.492	1.563	1.563	
Unlimited		1.563	1.563	1.597	1.666	1.666	

Appendix F
The Prudential Insurance Company of America
Individual Long Term Care Insurance Plan
Base Rates and Adjustment Factors

GRP 112687 & GRP 112685
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Adjustment Factors - Additional Riders						
Restoration of Benefits Rider		Issue Age	Joint Waiver Rider	Survivor Benefit Rider	Shortened Benefit Period Nonforfeiture Rider	
Benefit Period					Included	
2 YEAR	1.03	18 - 55	1.01	1.12		
3 YEAR	1.02	56 - 67	1.02	1.12	Yes	1.11
4 YEAR*	1.01	68 - 72	1.05	1.12	No	1.00
5 YEAR*	1.01	73 - 77	1.11	1.10		
UNLIMITED*	1.00	78 +	1.20	1.05		

Adjustment Factors - Underwriting Class	
Underwriting Class	
Standard	1.00
Rated	1.25

Adjustment Factors - Marital / Caregiver Status			
Marital/Caregiver Status	Without Select Health Discount	With Select Health Discount	Minimum Discount Factor
Married Single	0.90	0.75	0.70
Married Joint	0.80	0.70	0.70
Qualified Adult	0.85	0.70	0.70
Single (Not Married)	1.00	0.85	0.70

Adjustment Factors - Premium Payment Mode	
Premium Payment Mode	
Annual	1.000
Semi-Annual	0.515
Quarterly	0.265
Auto-Monthly	0.085

Pennsylvania Rates
April 1, 2016

SERFF Tracking #:

PRUD-130397957

State Tracking #:

PRUD-130397957

Company Tracking #:

IIGHILTC2RERATE-RP-PA

State: Pennsylvania

Filing Company:

The Prudential Insurance Company of America

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name: Individual Long Term Care Insurance

Project Name/Number: ILTC-2 Re-Rate/5I-2015

Supporting Document Schedules

Satisfied - Item:	Transmittal Letter (A&H)
Comments:	
Attachment(s):	PA - Filing Cover Letter - 1-12-2016.pdf
Item Status:	
Status Date:	

Bypassed - Item:	Actuarial Certification (A&H)
Bypass Reason:	Please refer to Section 24 (Page 9) of the Actuarial Memorandum attached to the Supporting Documentation Tab of this filing.
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Actuarial Memorandum and Explanatory Information (A&H)
Comments:	
Attachment(s):	PA - Actuarial Memorandum - Revised Rates ILTC-2 - 1-2016.pdf PA - Appendices - ILTC-2 - 1-2016.pdf
Item Status:	
Status Date:	

Bypassed - Item:	Advertisements (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Authorization to File (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Insert Page Explanation (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	

SERFF Tracking #:

PRUD-130397957

State Tracking #:

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The Prudential Insurance Company of America

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name: Individual Long Term Care Insurance

Project Name/Number: ILTC-2 Re-Rate/5I-2015

Status Date:	
Bypassed - Item:	Rate Table (A&H)
Bypass Reason:	Please refer to the Rate Schedule Tab of this filing.
Attachment(s):	
Item Status:	
Status Date:	
Bypassed - Item:	Replacement Form with Highlighted Changes (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	
Bypassed - Item:	Reserve Calculation (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	
Bypassed - Item:	Variability Explanation (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	
Satisfied - Item:	Appendix C - Description of Experience Analysis and Assumption Setting
Comments:	
Attachment(s):	PA - Appendix C - Description of Experience Analysis and Assumption Setting - 1-2016.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Appendix C - Exhibit 1 - Mortality Details - ILTC-2
Comments:	
Attachment(s):	PA - Appendix C - Exhibit 1 - Mortality Details - ILTC-2 - 1-2016.pdf
Item Status:	
Status Date:	

SERFF Tracking #:

PRUD-130397957

State Tracking #:

PRUD-130397957

Company Tracking #:

IIGHILTC2RERATE-RP-PA

State:

Pennsylvania

Filing Company:

The Prudential Insurance Company of America

TOI/Sub-TOI:

LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name:

Individual Long Term Care Insurance

Project Name/Number:

ILTC-2 Re-Rate/5I-2015

Satisfied - Item:	Appendix C - Exhibit 2 - Lapse Analysis Details - ILTC-2
Comments:	
Attachment(s):	PA - Appendix C - Exhibit 2 - Lapse Analysis Details - ILTC-2 - 1-2016.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Appendix C - Exhibit 3 - Morbidity Details - ILTC-2
Comments:	
Attachment(s):	PA - Appendix C - Exhibit 3 - Morbidity Details - ILTC-2 - 1-2016.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Appendix D - Persistency - ILTC-2
Comments:	
Attachment(s):	PA - Appendix D - Persistency - ILTC-2 - 1-2016.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Appendix E - DOB - ILTC-2
Comments:	
Attachment(s):	PA - Appendix E - DOB - ILTC-2 - 1-2016.pdf
Item Status:	
Status Date:	



Keith Burns, ASA, MAAA
 Vice President and Actuary
 Financial Management

The Prudential Insurance Company of America
 Long Term Care Unit
 100 Mulberry Street
 Gateway Center 2, 11th Floor
 Newark, NJ 07102
 Tel 402 715-4861
keith.burns@prudential.com

January 12, 2016

The Honorable Teresa D. Miller
 Commissioner of Insurance
 Pennsylvania Insurance Department
 1326 Strawberry Square
 Harrisburg, PA 17120

Re: The Prudential Insurance Company of America
 NAIC #304-68241
 Individual Long Term Care Insurance
 Form Numbers: GRP 112687, et al and GRP 112685, et al

Dear Commissioner Miller:

We enclose for your review a long-term care insurance rate schedule change. We are requesting the approval of a premium rate increase for the above referenced forms. This rate revision is a follow-up request meant to recover rate revisions that were not fully approved in Pennsylvania. Approval of this request would bring Pennsylvania's premiums in line with states that have approved full amounts in the past.

Form GRP 112687 (ILTC 2) was previously approved by the Department on March 11, 2004 and Form GRP 112685 (ILTC-2 Franchise) was previously approved by the Department on February 9, 2004. These policies were sold nationwide during the period of 2002 through 2009. These products are currently not being marketed in any state.

Policy	No Cash Rider	No Cash Rider w/Unlimited Lifetime Maximum	Cash Rider	Cash Rider w/ Unlimited Lifetime Maximum
GRP 112687	8.4%	25.1%	16.7%	29.2%
GRP 112685	8.4%	25.1%	16.7%	29.2%

The rate increase is needed to help ensure that future premiums, in combination with existing reserves, will be adequate to fund anticipated claims. We have tried to keep these increases as low as reasonably possible in the hope of minimizing the impact on our policyholders. We will continue to monitor the performance of this block of business after this rate action. It is possible that as we continue to regularly review the experience of these policies, another increase may be needed in the future.

The deterioration of experience relative to pricing has contributed to the need to strengthen Prudential's reserves depleting surplus. On a statutory basis, the LTC business holds \$1.6 billion in Asset Adequacy Testing reserves as of December 31, 2014. In addition, in 2012, Prudential's LTC business went into GAAP loss recognition incurring a pre-tax charge of \$639 million.

The requested rate increases will not restore original profit margins, but will help Prudential avoid additional losses as well as further depletion of its surplus. The increases will also help maintain equity within Prudential's policyholder population as deferring rate increases will only increase the size of needed future rate increases.

The proposed premium rates will be effective on each policy's first modal premium due date that is on or after the state increase effective date established by Prudential following state approval. The earliest increase, once approval is provided, will be no earlier than 60 days from the date of approval, so that Prudential can provide sixty days advance notice of the rate increase to insureds.

We understand that a premium increase may be difficult for our policyholders to absorb. Consequently, Prudential is prepared to offer a number of options to enable the premium an insured is paying to remain the same such as reducing their benefit period, decreasing their Daily Benefit Maximum, or dropping rider(s) (e.g. optional coverage). Additionally, as an alternative, the Contingent Non-forfeiture benefit will be made available to all impacted policyholders whose plan design does not include the Non-forfeiture Benefit Rider.

Furthermore, if not already exercised during the previous rate increase, policyholders with the Cash Benefit Rider will be given the opportunity to convert to a Cash Indemnity Rider. These policy amendments (GRP 114976) and (GRP 114977) were previously approved by the Department on September 26, 2013, under SERFF Filing Numbers PRUD-129012172 and PRUD-129012411.

The following items are included with this submission:

- All Actuarial Material
- All Required Certifications
- State transmittal and checklists (If applicable)

Correspondence: Please correspond directly with my associate concerning this filing.

Raenonna L. Prince, CLTC, LTCP
Lead Analyst
The Prudential Insurance Company of America
P. O. Box 7907
Philadelphia, PA 19101-7907

Voice: (800) 732-0416 or (215) 658-6281
Fax: (888) 294-6332
e-mail: raenonna.prince@prudential.com

Very truly yours,



Keith Burns, ASA, MAAA
Vice President and Actuary

Enclosures

January 5, 2016
Actuarial Memorandum Supporting Rate Revision for
The Prudential Insurance Company of America
Individual Long-Term Care Insurance Plan
Pennsylvania

1. Scope and Purpose

The purpose of this memorandum is to provide actuarial information supporting a rate revision to premiums for the following The Prudential Insurance Company of America's Tax-Qualified individual long-term care Forms and their associated riders:

<u>Product Name</u>	<u>Form Number</u>	<u>Issue Dates in Pennsylvania</u>
LTC By Design (ILTC2)	GRP112687	5/2004 - 6/2006
LTC By Design (ILTC2) Franchise	GRP112685	5/2004 - 6/2006

Some riders may not be available in all states. This rate filing is not intended to be used for other purposes.

The rate revision is a follow-up request meant to recover rate revisions that were not fully approved in Pennsylvania. The rate increases continue to be actuarially justified and are unchanged from our original requests.

Upon approval of this rate revision, Prudential will communicate to policyholders their options to reduce the impact of the rate increase. There will also be opportunities for almost all policyholders to keep the premium at or below the same level they were paying prior to the rate revision. These options will include increasing the elimination period, reducing the lifetime maximum, reducing the daily benefit, eliminating optional riders, opting into the cash indemnity rider from the cash benefit rider, and a contingent non-forfeiture option that we will be offering to all policyholders regardless of their age or rate increase amount.

These revisions are necessary because the current best estimate projections of the nationwide lifetime loss ratios are significantly worse than the expected loss ratios. The higher lifetime loss ratios are due to adverse morbidity and persistency experience.

Please refer to Section 22 for a description of the information contained in each Appendix.

2. Description of Benefits

The policies issued on this form are referred as the "LTC By Design" product series. This product was individually underwritten and provides comprehensive long-term care coverage for care received in a nursing home, assisted living facility, or hospice in addition to home and community-based care. This product is intended to be Tax Qualified Long Term Care

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Insurance Contracts as defined by the internal revenue code section 7702B(b).

This product reimburses covered long-term care expenses subject to the amount of coverage purchased. A waiting period, institutional daily benefit amount, home and community care percentage, maximum lifetime benefit amount and inflation protection option are selected at issue. The available choices can be found in the attached premium rate tables.

The benefit eligibility criteria is based on the insured's loss of the ability to perform two of the six activities of daily living (ADLs) or having a severe cognitive impairment. Activities of Daily Living are bathing, continence, dressing, eating, toileting, and transferring. Premiums will be waived beginning the first day of the next month following when LTC benefits are payable.

There are several optional riders that were sold with this product, including a cash benefit option and a monthly benefit option. The cash benefit option allows the insured to choose to receive benefits for Home and Community-Based Care as a cash benefit rather than as reimbursement. No formal services are required to receive a cash benefit. Policies with the cash benefit option are referred to as "Cash Plans" and plans without the cash benefit option are referred to as "Reimbursement Plans". The monthly benefit option provides benefits for Home and Community-Based Care on a monthly basis such that any or all of the benefits for Home and Community-Based Care can be used within the time frames that meet the insured's needs.

The Cash Indemnity Rider will pay the full daily benefit amount for each day that home care formal services are received.

3. Renewability Clause

This product is a Guaranteed Renewable, Individual Long Term Care policy.

4. Marketing Method

This plan was marketed to individuals by licensed agents.

5. Applicability

The revised rates contained in this memorandum will be applicable to in-force policies, as these policy forms are no longer sold in the market, and all future periodic inflation protection offers. The revised premium rate schedules can be found in Appendix F.

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6. Actuarial Assumptions

The actuarial assumptions used to project the future premiums and claims are described in this section. Appendix C provides further details of the experience studies conducted that were used to develop the actuarial assumptions. These current assumptions, developed in 2015, are Prudential's best estimate expectations of future experience and do not include any provisions for adverse experience. These assumptions are the basis for the assumptions being used in the company's internal cash flow testing.

Morbidity

The best estimate morbidity assumptions were developed based on a combination of the Prudential's historical claim experience, the Milliman 2011 *Long Term Care Guidelines (Guidelines)* and judgment. The *Guidelines* reflect over 15.3 million life years of exposure and \$10.5 billion of incurred claims and the experience and judgment of Milliman actuaries. The policy design and coverages, the underwriting applied at the time, and the claim adjudication process were all considered when setting the claim cost assumptions. The claim cost assumptions reflect Prudential's current best estimate of future morbidity, including morbidity improvement of 1% per year through 2035. The assumptions do not include any adverse selection from the rate increase or loads for moderately adverse experience.

Mortality

The mortality assumptions were developed from a mortality study conducted on the Prudential's experience and judgment. The best estimate mortality assumption is the Annuity 2000 Basic Table on a sex distinct basis with mortality selection factors, mortality attained age factors and mortality improvement. The mortality selection factors vary by issue age and duration and start at 0.25 in duration 1 and grade up to an ultimate factor by duration 30. The ultimate factor varies by issue age and ranges from 0.90 at the younger ages to 1.05 at the older ages. A set of mortality attained age factors is also applied that lowers the mortality by 10% for attained ages 60 and under and grades to an increase of 10% in mortality by age 100. Mortality improvement of 0.6% per year through 2035 is assumed. The assumptions do not include any loads for moderately adverse experience.

Lapses

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The voluntary lapse assumptions were developed from a policy persistency study conducted on the Company's experience and judgment. Lapse rates are combined with mortality rates to derive the total termination rate. In addition, the projections also terminate a policy if the insured exhausts their benefits. We assumed all remaining policies would terminate at attained age 120. The lapse assumptions represent the best estimate expectations of future experience and do not include any provisions for adverse experience. Lastly, the projections include an annual shock lapse rate of 1.3% assumed over the first two years of implementation. Voluntary lapse rates are shown below and vary by policy duration.

Voluntary Lapse Rates - Lifetime Pay				
Duration	Single - No Inflation	Single - Inflation	Married - No Inflation	Married - Inflation
1	9.50%	8.00%	6.00%	4.00%
2	6.50%	6.00%	4.00%	3.00%
3	5.50%	4.50%	3.50%	3.00%
4	5.00%	3.50%	3.00%	2.50%
5	4.50%	3.00%	2.50%	1.80%
6	3.50%	3.00%	2.00%	1.50%
7	3.00%	3.00%	1.75%	1.50%
8	2.75%	2.00%	1.75%	1.30%
9	2.75%	1.75%	1.75%	1.00%
10-20	2.75%	1.75%	1.75%	0.75%
21+	2.50%	1.50%	1.50%	0.50%

NOTE: No inflation includes plans without inflation and GPO.

Voluntary Lapse Rates - Limited Pay			
Duration	10 Pay	Premium Reduction at Age 65	Paid Up at Age 65
1	3.50%	4.50%	5.00%
2	2.50%	3.50%	4.50%
3	1.50%	3.00%	3.50%
4	1.00%	2.50%	2.50%
5	0.50%	2.00%	2.00%
6	0.50%	2.00%	2.00%
7	0.50%	1.50%	1.50%
8	0.50%	1.50%	1.50%
9	0.00%	1.50%	1.50%

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10-20	0.00%	1.50%	1.25%
21+	0.00%	1.25%*	1.00%**

* Starting at age 55, grade into 1.0% ultimate lapse rate by attained age 65.

** Starting at age 55, grade into 0.0% ultimate lapse rate by attained age 65.

Appendix D contains a comparison of the actual total termination rates to both the original pricing assumptions and current assumptions.

Interest Rate

An annual interest rate of 4.5% was used to calculate the lifetime loss ratio in the supporting appendices. This was determined based on the predominant number of certificates issued in years that the maximum statutory valuation rate was 4.5%.

Expenses

The need for a rate increase is based on the lifetime loss ratio being in excess of the minimum loss ratio. Expenses do not directly impact the lifetime loss ratio and therefore are not used as justification for the rate increase. As such, expenses are not being projected and are not included in this filing.

7. Premium Classes

The Company used several premium classes based on the underwriting assessment of the potential policyholder at time of issue. These premium classes are shown in the premium rate schedules included in Appendix F.

8. Issue Age Range

This product was available for issue ages up to 84. Premiums are based on issue age.

9. Area Factors

The Company did not use area factors within the state in the premium scale for this product.

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10. Average Annual Premium

The average annual premium for this product for both prior to the impact of the requested rate increase, and after, is indicated in Appendix A to this memorandum.

11. Modal Premium Factors

Modal loads are required because of the varied expenses incurred by the Company and the effect of interest and persistency. The modal premium factors will remain unchanged from the current factors.

12. Claim Liability and Reserve

Claim reserves were calculated using appropriate actuarial methods for IBNR and for open claims on a disabled life basis. The claim reserves were discounted to the date of incurral for each claim and have been included in the historical incurred claims. An annual interest rate of 4.5% was used to calculate the present value of future claims in the supporting exhibits.

13. Active Life Reserves

We have provided supporting evidence for the justification of the proposed increase based on the relationship of incurred claims divided by earned premium compared to the minimum required loss ratios. Incurred claims exclude any change in active life reserves.

14. Trend Assumption

Benefits payable are equal to or less than the daily or monthly benefit limit. We have not included any medical trend in the projections.

15. Requested Rate Increase and Demonstration of Satisfaction of Loss Ratio Requirements

Prudential is requesting an average premium increase of 16.8%. These rate increases vary depending on whether the policyholder has benefit periods that are limited (2, 3, 4 or 5 years) or unlimited as well as if the policyholder has reimbursement benefits or cash rider.

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Policy Type	ILTC2
Limited Benefit / Reimbursement	8.4%
Limited Lifetime Max / Cash	16.7%
Unlimited Lifetime Max / Reimbursement	25.1%
Unlimited Lifetime Max / Cash	29.2%
Average (using nationwide distribution mix)	16.8%

Satisfaction of the loss ratio requirement is demonstrated in Appendix A. The demonstration is based on a 58% loss ratio on the initial premium and an 85% loss ratio on the increased premium. This approach requires that the sum of the historical and projected future incurred claims must exceed the sum of 58% of the initial premium and 85% of the increased premium.

16. Distribution of Business

The historical experience reflects the actual distribution of policies during the experience period. We used the current distribution of business as of June 30, 2015 to project future experience. Appendix E contains the distribution of the inforce policies by key demographic and benefit characteristics.

17. Experience - Past and Future

The historical and projected nationwide and state-specific experience, both with and without the rate increase, is contained in Appendix B.

Historical experience is shown by claim incurral year.

18. Lifetime Loss Ratio

The anticipated nationwide lifetime loss ratios, both without a rate increase and with the requested rate increase, are shown in Appendix A. The development of these nationwide lifetime loss ratios, are shown in Appendix B and Appendix G.

The rate increase is assumed effective April 1, 2016 in our projections.

19. History of Rate Adjustments

See Appendix A for a history of rate increases on inforce policyholders with this policy form in this state.

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20. Number of Policyholders

The current number of policyholders as of June 30, 2015 can be found in Appendix A.

21. Proposed Effective Date

This rate revision will be implemented following state approval and a minimum of a 60 day notification to the certificate holder. Implementation will be no earlier than April 1, 2016.

22. Summary of Appendices

Appendix A contains information that is specific to the state in which this filing is made. Examples of some items include are the requested rate increase, the average annual premium, demonstration of meeting required minimum loss ratio standards, the number of policyholders inforce, etc.

Appendix B contains historical and projected nationwide experience for all policies issued under this form. The appendix also includes the projected lifetime loss ratios both without and with the proposed increase.

Appendix C contains three exhibits that show our actual to expected lapse, mortality and morbidity experience.

Appendix D contains a breakdown of our current persistency assumptions.

Appendix E contains the distribution of the inforce policies by key demographic and benefit characteristics.

Appendix F contains the premium rate pages associated with this filing.

Appendix G contains the same information as Appendix B except it contains only state specific experience and projections.

23. Relationship of Renewal Premium to New Business Premium.

Prudential is no longer selling any new Long-Term Care business. Therefore, the comparison of renewal premium rates after the rate increase to the Company's current new business premium rate schedule is not applicable.

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24. Actuarial Certification

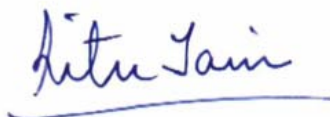
I am a member of the American Academy of Actuaries. I meet the Academy's qualification standards for rendering this opinion and am familiar with the requirements for filing rate increases for long term care insurance premiums.

To the best of my knowledge and judgment this rate filing is in compliance with the applicable laws and regulations of this State as they relate to premium rate developments and revisions, with the exception that Prudential is not currently providing a certification that no future increases are anticipated under moderately adverse experience.

The policy design and coverages, the underwriting used at the time of issue, and the claim adjudication process were all considered when setting the actuarial assumptions.

In forming my opinion, I have used actuarial assumptions and actuarial methods as I considered necessary. I have relied on projection information provided by Dan Nitz, FSA, MAAA. He is an Actuary at Milliman who used data and assumptions that were developed and supplied by Prudential in developing these projections. The pricing assumptions are consistent with Prudential's best estimates at the time of this filing and do not include a margin for adverse experience.

The premium rates are not excessive or unfairly discriminatory. Prudential may need to file for additional in-force premium increases on these forms in the future.



Ritu Jain, ASA, MAAA
Associate Actuary
Prudential Long Term Care
January 5, 2016

Appendix A
The Prudential Insurance Company of America
ILTC2

Pennsylvania

Requested Rate Increase for Cash / Unlimited BP Policies = 29.2%
 Requested Rate Increase for Cash / Limited BP Policies = 16.7%
 Requested Rate Increase for Reimbursement / Unlimited BP Policies = 25.1%
 Requested Rate Increase for Reimbursement / Limited BP Policies = 8.4%

10 Average Annual Premium

	Pennsylvania	Nationwide
Without Increase	\$2,758	\$2,773
With Increase	\$3,127	\$3,238

15 Satisfaction of Loss Ratio Requirements

Rate Stability Requirement

1) Total Incurred Claims		1,166,624,666
58% of initial premium	484,958,735	
85% of increased premium	184,393,047	
2) Sum of 58%/85% Premium		669,351,782
Is 1 greater than 2?		Yes

18 Lifetime Loss Ratio

Policy type	Without Increase	With Increase
All	120%	111%
Cash / Unlimited	168%	147%
Cash / Limited	120%	111%
Reimbursement / Unlimited	139%	124%
Reimbursement / Limited	95%	92%

19 History of Rate Adjustments

Cash Policies:

14% Implemented on 4/25/2012
 14% Implemented on 4/25/2013
 20% Implemented on 5/1/2014

Reimbursement Policies:

7.2% Implemented on 4/25/2012
 7.2% Implemented on 4/25/2013
 20% Implemented on 5/1/2014

20 Number of Policyholders and Annualized Premium as of June 30, 2015

Policy Type	Pennsylvania	Nationwide
All	387	14,005
Cash / Unlimited	3	737
Cash / Limited	9	977
Reimbursement / Unlimited	76	4,394
Reimbursement / Limited	299	7,897

Policy Type	Pennsylvania	Nationwide
All	\$1,067,224	\$38,829,561
Cash / Unlimited	\$21,180	\$3,711,232
Cash / Limited	\$29,361	\$2,854,832
Reimbursement / Unlimited	\$277,008	\$13,483,210
Reimbursement / Limited	\$739,675	\$18,780,288

Appendix B
The Prudential Insurance Company of America
Historical and Projected Experience
Nationwide Experience
Pennsylvania Rate Basis
ILTC2

Historical

Calendar Year	Earned Premium	Paid Claims	Claim Reserve	Incurred Claims	Incurred Ratio
2002	4,208	0	0	0	0%
2003	1,660,611	4,258	0	4,258	0%
2004	12,460,009	201,254	0	201,254	2%
2005	25,865,418	1,696,618	0	1,696,618	7%
2006	33,688,223	4,414,768	1,415,545	5,830,314	17%
2007	39,753,916	6,299,130	1,681,965	7,981,096	20%
2008	40,161,219	6,005,020	618,374	6,623,394	16%
2009	39,208,531	8,150,352	2,452,460	10,602,812	27%
2010	39,748,839	6,660,941	3,730,666	10,391,607	26%
2011	39,180,015	8,262,153	5,068,919	13,331,072	34%
2012	38,826,300	6,468,377	6,202,139	12,670,516	33%
2013	39,679,454	3,910,388	7,693,797	11,604,185	29%
2014	43,081,146	2,856,199	14,645,525	17,501,724	41%
2015*	22,344,539	48,251	7,179,998	7,228,249	32%
Active Life Reserve Balance as of 06/30/2015:			336,734,781		

Projections without Requested Rate Increase

Calendar Year	Earned Premium	Incurred Claims	Incurred Ratio
2015**	22,152,361	10,087,422	46%
2016	42,737,388	21,470,621	50%
2017	40,812,474	23,729,463	58%
2018	39,345,086	26,186,562	67%
2019	37,947,714	28,821,850	76%
2020	36,445,177	31,663,775	87%
2021	35,023,069	34,698,318	99%
2022	33,604,225	37,934,889	113%
2023	32,191,034	41,341,675	128%
2024	30,753,196	44,904,493	146%
2025	29,353,324	48,662,702	166%
2026	27,957,911	52,571,875	188%
2027	26,548,929	56,591,620	213%
2028	25,173,416	60,663,221	241%
2029	23,818,220	64,696,010	272%
2030	22,475,175	68,597,472	305%
2031	21,152,708	72,270,497	342%
2032	19,845,761	75,653,351	381%
2033	18,562,148	78,707,546	424%
2034	17,304,521	81,327,288	470%
2035	16,074,498	83,446,812	519%
2036	14,878,732	85,445,073	574%
2037	13,713,487	87,306,070	637%
2038	12,570,842	88,687,390	706%
2039	11,487,412	89,453,816	779%
2040	10,450,062	89,507,561	857%
2041	9,462,319	88,841,953	939%
2042	8,527,471	87,549,934	1027%
2043	7,648,088	85,664,870	1120%
2044	6,826,107	83,189,759	1219%
2045	6,062,285	80,108,488	1321%
2046	5,356,734	76,497,315	1428%
2047	4,709,093	72,419,549	1538%
2048	4,118,419	68,023,077	1652%
2049	3,583,385	63,407,948	1769%
2050	3,101,811	58,598,216	1889%
2051	2,671,028	53,739,858	2012%
2052	2,288,223	48,958,447	2140%
2053	1,950,292	44,370,765	2275%
2054 and later	9,760,647	360,829,603	3697%

Projections with Requested Rate Increase

Calendar Year	Earned Premium	Incurred Claims	Incurred Ratio
2015**	22,152,361	10,087,422	46%
2016	46,111,059	21,344,740	46%
2017	46,325,687	23,449,647	51%
2018	44,718,183	25,851,859	58%
2019	43,147,966	28,430,254	66%
2020	41,456,157	31,208,802	75%
2021	39,856,536	34,174,755	86%
2022	38,260,178	37,336,428	98%
2023	36,670,121	40,662,314	111%
2024	35,048,859	44,139,067	126%
2025	33,472,444	47,804,616	143%
2026	31,899,732	51,616,284	162%
2027	30,308,055	55,533,486	183%
2028	28,756,433	59,499,296	207%
2029	27,227,039	63,424,734	233%
2030	25,710,401	67,219,118	261%
2031	24,215,795	70,787,518	292%
2032	22,737,354	74,069,731	326%
2033	21,283,966	77,028,553	362%
2034	19,858,823	79,561,345	401%
2035	18,464,017	81,604,099	442%
2036	17,106,552	83,528,222	488%
2037	15,782,247	85,318,013	541%
2038	14,481,769	86,639,460	598%
2039	13,247,807	87,360,457	659%
2040	12,064,919	87,386,084	724%
2041	10,937,203	86,710,658	793%
2042	9,868,485	85,425,572	866%
2043	8,861,795	83,563,998	943%
2044	7,919,463	81,128,955	1024%
2045	7,042,519	78,105,298	1109%
2046	6,231,268	74,567,344	1197%
2047	5,485,459	70,576,884	1287%
2048	4,804,181	66,278,113	1380%
2049	4,186,067	61,768,607	1476%
2050	3,628,798	57,072,044	1573%
2051	3,129,480	52,330,317	1672%
2052	2,685,027	47,665,436	1775%
2053	2,292,005	43,190,849	1884%
2054 and later	11,556,000	350,816,002	3036%

* Historical 2015 Experience - 1/1/2015 through 6/30/2015

** Projected 2015 Experience - 7/1/2015 through 12/31/2015

Loss Ratio Summaries

Accumulated Value of Historical to 6/30/2015	527,031,148	127,380,228	24%	527,031,148	127,380,228	24%
Present Value of Future to 6/30/2015	465,814,896	1,060,968,875	228%	526,037,598	1,039,244,438	198%
Total Values (Discounted at 4.5%)	992,846,045	1,188,349,103	120%	1,053,068,746	1,166,624,666	111%
Projected Loss Ratio without Rate Increase				Projected Loss Ratio with Rate Increase		
Overall		120%		Overall		111%
Cash / Unlimited BP Policies		168%		Cash / Unlimited BP Policies		147%
Cash / Limited BP Policies		120%		Cash / Limited BP Policies		111%
Reimbursement / Unlimited BP Policies		139%		Reimbursement / Unlimited BP Policies		124%
Reimbursement / Limited BP Policies		95%		Reimbursement / Limited BP Policies		92%
Minimum Lifetime Loss Ratio		60%				

Appendix G
The Prudential Insurance Company of America
Historical and Projected Experience
Pennsylvania Experience
ILTC2

Historical

Calendar Year	Earned Premium	Paid Claims	Claim Reserve	Incurred Claims	Incurred Ratio
2002	0	0	0	0	0%
2003	0	0	0	0	0%
2004	142,044	0	0	0	0%
2005	841,936	18,858	0	18,858	2%
2006	1,067,145	15,534	0	15,534	1%
2007	1,043,781	83,241	0	83,241	8%
2008	1,014,412	0	0	0	0%
2009	997,070	369,022	0	369,022	37%
2010	1,024,871	208,516	91,929	300,444	29%
2011	1,006,807	0	0	0	0%
2012	976,920	141,769	346,003	487,772	50%
2013	944,986	23,082	0	23,082	2%
2014	1,020,125	93,143	414,508	507,651	50%
2015*	518,338	0	260,928	260,928	50%
Active Life Reserve Balance as of 06/30/2015:			6,778,993		

Projections without Requested Rate Increase

Calendar Year	Earned Premium	Incurred Claims	Incurred Ratio
2015**	518,368	246,904	48%
2016	1,012,424	526,639	52%
2017	978,522	582,620	60%
2018	943,305	641,319	68%
2019	906,928	700,132	77%
2020	869,616	761,801	88%
2021	831,681	821,926	99%
2022	793,352	885,882	112%
2023	754,878	953,233	126%
2024	716,334	1,020,572	142%
2025	678,301	1,087,820	160%
2026	641,363	1,156,947	180%
2027	604,967	1,227,773	203%
2028	568,926	1,296,022	228%
2029	533,346	1,359,487	255%
2030	498,369	1,416,860	284%
2031	464,072	1,464,853	316%
2032	430,595	1,502,275	349%
2033	398,079	1,524,956	383%
2034	366,619	1,536,423	419%
2035	336,299	1,539,013	458%
2036	307,139	1,537,829	501%
2037	279,211	1,533,815	549%
2038	252,646	1,521,519	602%
2039	227,515	1,497,830	658%
2040	203,863	1,464,502	718%
2041	181,722	1,421,712	782%
2042	161,150	1,370,180	850%
2043	142,155	1,312,308	923%
2044	124,712	1,246,282	999%
2045	108,780	1,174,167	1079%
2046	94,307	1,096,558	1163%
2047	81,259	1,012,510	1246%
2048	69,589	929,237	1335%
2049	59,231	849,000	1433%
2050	50,097	769,773	1537%
2051	42,091	688,865	1637%
2052	35,137	611,909	1741%
2053	29,143	541,876	1859%
2054 and later	120,302	3,429,380	2851%

Projections with Requested Rate Increase

Calendar Year	Earned Premium	Incurred Claims	Incurred Ratio
2015**	518,368	246,904	48%
2016	1,074,964	523,194	49%
2017	1,081,945	575,584	53%
2018	1,043,890	633,129	61%
2019	1,003,809	690,767	69%
2020	962,692	751,145	78%
2021	920,882	809,905	88%
2022	878,628	872,406	99%
2023	836,203	938,208	112%
2024	793,692	1,003,958	126%
2025	751,735	1,069,575	142%
2026	710,985	1,136,991	160%
2027	670,829	1,206,065	180%
2028	631,060	1,272,603	202%
2029	591,795	1,334,439	225%
2030	553,193	1,390,280	251%
2031	515,340	1,436,905	279%
2032	478,388	1,473,170	308%
2033	442,492	1,494,994	338%
2034	407,755	1,505,823	369%
2035	374,271	1,507,953	403%
2036	342,059	1,506,387	440%
2037	311,198	1,502,067	483%
2038	281,829	1,489,661	529%
2039	254,030	1,466,118	577%
2040	227,853	1,433,173	629%
2041	203,331	1,390,988	684%
2042	180,529	1,340,263	742%
2043	159,455	1,283,366	805%
2044	140,084	1,218,517	870%
2045	122,373	1,147,758	938%
2046	106,265	1,071,642	1008%
2047	91,727	989,252	1078%
2048	78,705	907,641	1153%
2049	67,130	829,011	1235%
2050	56,904	751,409	1320%
2051	47,926	672,223	1403%
2052	40,113	596,930	1488%
2053	33,362	528,424	1584%
2054 and later	139,736	3,337,071	2388%

* Historical 2015 Experience - 1/1/2015 through 6/30/2015

** Projected 2015 Experience - 7/1/2015 through 12/31/2015

Loss Ratio Summaries

Accumulated Value of Historical to 6/30/2015	13,501,870	2,401,865	18%	13,501,870	2,401,865	18%
Present Value of Future to 6/30/2015	10,666,786	20,081,450	188%	11,727,902	19,715,079	168%
Total Values (Discounted at 4.5%)	24,168,656	22,483,315	93%	25,229,772	22,116,945	88%
Projected Loss Ratio without Rate Increase				Projected Loss Ratio with Rate Increase		
Overall		93%		Overall		88%
Cash / Unlimited BP Policies		51%		Cash / Unlimited BP Policies		46%
Cash / Limited BP Policies		64%		Cash / Limited BP Policies		60%
Reimbursement / Unlimited BP Policies		126%		Reimbursement / Unlimited BP Policies		113%
Reimbursement / Limited BP Policies		84%		Reimbursement / Limited BP Policies		81%

Appendix C
The Prudential Insurance Company of America
Description of Experience Analysis and Assumption Setting

Mortality Study

A mortality study was conducted on the Company's actual experience on its entire block of long term care business. In general, the best estimate mortality assumptions are based on a steepened version of the Annuity 2000 Basic table with mortality selection factors and mortality improvement. Actual deaths were determined by comparing insureds against the Social Security Administration's Death Master File (DMF). A terminated policy is considered a death if it matched the DMF or was coded as "Death" in the administrative system. Otherwise, the terminated policy is considered a voluntary lapse (if it did not exhaust benefits).

The future expected mortality assumptions were developed based on the historical actual experience and judgment. Based on our analysis, the Annuity 2000 table matched actual experience the closest, with some adjustments. First, a steepened mortality table matches the experience better. The mortality was lowered by 10% for ages less than 60 and raised the mortality 10% for ages above 100 (grading from 90% to 100% from age 60 to age 70 and then from 100% to 110% from age 90 to age 100). Second, mortality selection factors were developed by issue age and duration. Lastly, mortality improvement of 0.6% per year from 2000 through 2035 was assumed.

Exhibit 1 contains the comparison of actual experience through June 30, 2015 to the current mortality assumptions. The Exhibit shows total lives, total terminations (both voluntary lapse and actual deaths), actual deaths, expected deaths and the resulting mortality rates. Experience is shown by policy duration and attained age. Since the current mortality assumptions reasonably match the historical actual experience, the assumptions are reasonable to use to project the inforce into the future.

Voluntary Lapse Study

A voluntary lapse study was also conducted on the Company's actual experience. Voluntary lapse rates were calculated based on two approaches. First, "actual lapses" were determined by subtracting actual deaths and actual benefit exhausts from total terminations. Second, "implied lapses" were determined by subtracting expected deaths, using the mortality assumptions discussed above, and actual exhausts from total terminations. To the extent that the actual deaths are understated (due to underreporting of deaths or incorrect coding of social security numbers), actual mortality will increase while actual lapses will decrease. The total termination rates will not change.

The future expected voluntary lapse assumptions were developed based on the historical actual

experience and judgment. The expected lapse rates vary by policy duration and select business segments.

Exhibit 2 contains the comparison of actual lapse experience through June 30, 2015 to the current assumptions. The Exhibit shows total lives, total terminations (both voluntary lapse and actual deaths) and actual mortality rate. The voluntary lapse rates are shown as described above, as either “actual lapses” or “implied lapses.” Since the current voluntary lapse assumptions reasonably match the historical actual experience, the assumptions are reasonable to use to project the inforce into the future.

Appendix D contains a comparison of the actual total termination rates to both the original pricing assumptions and current assumptions.

Morbidity Study

A morbidity study was also conducted on the Company’s nationwide actual experience. The approach used to develop best estimate morbidity assumptions was to start with a set of baseline expected claims and review the experience along several key demographic and benefit characteristics. The primary focus of developing the fitting factors was to match historical incurred claims to expected incurred claims.

A claim is defined as an episode of care that is not separated by more than 180 calendar days. Actual claim incidence was determined by counting each claim. Actual incurred claims are based on paid claims and remaining claim reserves discounted (using an interest rate of 4.0% for this experience study) back to the claim incurred date. The claim reserves were discounted from valuation date to the claim incurred date using a 4.0% discount rate and excludes any waiver of premium load, LAE load and explicit margin. The IBNR was allocated across the most recent incurred year of expected claims. Actual incurred claims are calculated by adding together the present value of paid claims and claim reserves. Actual average claim severity was calculated by dividing actual incurred claims by the count of claims. In the morbidity study, waiver of premium was excluded from both the actual claims and expected claims.

The baseline expected incurred claims were developed from Milliman’s 2011 LTC Guidelines (*Guidelines*). Given the large size of the data supporting the *Guidelines*, it was viewed as a credible starting point for the analysis. Included in the baseline, was a 1% per year morbidity improvement in the historical expected claims, with 2011 as the assumed base year. This morbidity improvement is assumed to continue until 2035. Also, a composite factor was developed for the business based on the distribution by state and the area adjustment factors from the *Guidelines*.

The process of developing fitting factors, starting with the baseline expected, generally followed the following steps:

- Review experience by issue year and product to determine if the baseline selection factors used are appropriate
- Review experience by issue age, gender, marital status and / or underwriting type
- Review experience by key benefit and demographic characteristics

It should be noted that many of the factors are related to each other. So, some fitting did involve cycling back to prior steps. Also, the credibility of each specific segment was considered, along with judgment in setting the specific fitting factors.

Exhibit 3 contains the comparison of actual claim experience through June 30, 2015 to the current assumptions by calendar year, policy duration and attained age.

**Appendix C
Exhibit 1
The Prudential Insurance Company of America
Mortality Study
Experience by Policy Duration
ILTC2**

Policy Duration	Total Lives	Total Terminations	Actual Deaths	Expected Deaths	Mortality Rate		A:E
					Actual	Expected	
1 - 3	57,454	3,066	135	130	0.23%	0.23%	104%
4 - 6	49,620	1,645	210	238	0.42%	0.48%	88%
7 - 9	40,802	1,150	293	319	0.72%	0.78%	92%
10+	11,722	372	122	135	1.04%	1.15%	90%
Total	159,598	6,233	760	822	0.48%	0.52%	92%

Notes:

- 1) Experience is through June 30, 2015.
- 2) Expected Mortality Rate is based on the current assumption and uses the Annuity 2000 Table, with mortality selection factors, attained age factors, and 0.6% improvement per year from year 2000.
- 3) Total Terminations include Actual Deaths, Actual Lapses, and Actual Benefit Exhausts

Appendix C
Exhibit 1
The Prudential Insurance Company of America
Mortality Study
Experience by Attained Age
ILTC2

Attained Age	Total Lives	Total Terminations	Actual Deaths	Expected Deaths	Mortality Rate		A:E
					Actual	Expected	
<50	14,484	1,051	5	8	0.03%	0.05%	66%
50-54	17,326	723	20	19	0.12%	0.11%	103%
55-59	28,774	1,009	37	51	0.13%	0.18%	72%
60-64	36,158	1,144	89	105	0.25%	0.29%	85%
65-69	31,795	1,003	157	167	0.49%	0.53%	94%
70-74	18,823	672	167	179	0.89%	0.95%	93%
75-79	8,256	365	143	142	1.73%	1.73%	100%
80-84	3,149	180	86	100	2.73%	3.16%	86%
85-89	767	79	52	44	6.78%	5.74%	118%
90+	64	7	4	7	6.27%	10.42%	60%
Total	159,598	6,233	760	822	0.48%	0.52%	92%

Notes:

- 1) Experience is through June 30, 2015.
- 2) Expected Mortality Rate is based on the current assumption and uses the Annuity 2000 Table, with mortality selection factors, attained age factors, and 0.6% improvement per year from year 2000.
- 3) Total Terminations include Actual Deaths, Actual Lapses, and Actual Benefit Exhausts

Appendix C
Exhibit 2
Voluntary Lapse Study
The Prudential Insurance Company of America
Experience by Policy Duration
ILTC2

Policy Duration	Total Lives	Total Terminations		Mortality Rate		Voluntary Lapse Rate		
		Count	Rate	Actual	Expected	Actual	Implied	"Current"
1	19,849	1,362	6.86%	0.14%	0.15%	6.7%	6.7%	5.5%
2	18,487	939	5.08%	0.25%	0.23%	4.8%	4.9%	4.0%
3	17,547	709	4.04%	0.34%	0.32%	3.7%	3.7%	3.5%
4	16,795	658	3.92%	0.34%	0.40%	3.6%	3.5%	2.9%
5	16,026	504	3.14%	0.44%	0.49%	2.7%	2.6%	2.3%
6	15,373	454	2.95%	0.52%	0.58%	2.4%	2.3%	2.0%
7	14,762	395	2.68%	0.65%	0.68%	2.0%	1.9%	1.9%
8	13,703	424	3.09%	0.74%	0.79%	2.3%	2.3%	1.6%
9	11,131	320	2.87%	0.81%	0.94%	2.0%	1.9%	1.4%
10	8,003	254	3.17%	1.04%	1.10%	2.0%	1.9%	1.2%
11	3,326	109	3.28%	0.99%	1.30%	2.3%	1.9%	1.2%
12	116	5	4.31%	2.59%	1.47%	1.7%	2.8%	1.2%
Total	155,118	6,133	3.95%	0.48%	0.52%			

Notes:

- 1) Experience is through June 30, 2015, and only includes lifetime pay policies (excludes limited pay policies).
- 2) Expected Mortality Rate is based on the current assumption and uses the Annuity 2000 Table, with mortality selection factors, attained age factors, and 0.6% improvement per year from year 2000.
- 3) Actual Voluntary Lapse Rate is the Total Termination Rate minus the Actual Mortality Rate minus the Actual Benefit Exhaust Rate.
Benefit Exhausts are included in the Total Terminations listed above but excluded from the Actual Voluntary Lapse Rates.
- 4) Implied Voluntary Lapse Rate is the Total Termination Rate minus the Expected Mortality Rate minus the Actual Benefit Exhaust Rate.
- 5) Current Voluntary Lapse Rate is the current projection assumption.
The ultimate lapse rates vary between 0.5% to 2.5% depending on inflation and marital status.
The current lapse rates do not include shock lapse assumptions.

Appendix C
Exhibit 3
The Prudential Insurance Company of America
Claim Study
Experience by Calendar Year
ILTC2

Calendar Year	Total Lives	Actual Claims					Expected Claims			Actual to Expected		
		Count	Paid	Reserve	Severity	Incurred	Count	Severity	Incurred	Incidence	Severity	Incurred
2002	1	0	-	-	-	-	0	135,540	186	0%	0%	0%
2003	907	1	4,094	-	4,094	4,094	1	91,904	110,258	83%	4%	4%
2004	5,958	6	193,513	-	32,252	193,513	8	101,752	857,311	71%	32%	23%
2005	11,932	19	1,631,364	-	85,861	1,631,364	20	106,353	2,153,842	94%	81%	76%
2006	14,937	41	4,244,969	1,361,101	136,733	5,606,071	31	112,752	3,542,253	131%	121%	158%
2007	16,992	58	6,056,856	1,617,274	132,313	7,674,130	41	119,825	4,959,349	140%	110%	155%
2008	17,017	58	5,774,058	594,590	109,804	6,368,648	50	125,973	6,328,029	115%	87%	101%
2009	16,332	68	7,836,877	2,358,135	149,927	10,195,012	58	131,040	7,664,265	116%	114%	133%
2010	15,869	76	6,404,751	3,587,179	131,473	9,991,930	68	135,784	9,234,457	112%	97%	108%
2011	15,456	93	7,944,378	4,873,960	137,832	12,818,338	78	140,633	10,980,344	119%	98%	117%
2012	14,941	93	6,219,593	5,963,595	131,002	12,183,189	83	145,470	12,053,657	112%	90%	101%
2013	14,416	100	3,759,989	7,397,882	111,579	11,157,870	92	151,606	13,879,724	109%	74%	80%
2014	13,846	114	2,746,345	14,082,236	147,619	16,828,580	99	159,266	15,714,576	116%	93%	107%
2015	6,676	69	46,395	6,903,845	100,728	6,950,240	52	159,073	8,346,475	132%	63%	83%
Total	165,281	796	52,863,182	48,739,798	127,642	101,602,980	683	140,291	95,824,726	117%	91%	106%

Notes:

- 1) Experience is through June 30, 2015.
- 2) Paid claims represent the present value of paid claims discounted to the claim incurred date.
- 3) Reserve amounts represent the present value of the remaining claim reserve (including IBNR) discounted to the claim incurred date.
- 4) Severity is defined as incurred claims divided by the count of claims.
- 5) Expected Claims are the current best estimate assumptions used in the projections and are based on the Milliman 2011 Long-Term Care Guidelines including fitting factors.
- 6) Claim dollar amounts are discounted using a 4.5% interest rate (both actual and expected).
- 7) This exhibit excludes waiver of premium and return of premium benefits in both actual and expected results.

Appendix C
Exhibit 3
The Prudential Insurance Company of America
Claim Study
Experience by Policy Duration
ILTC2

Policy Duration	Total Lives	Actual Claims					Expected Claims			Actual to Expected		
		Count	Paid	Reserve	Severity	Incurred	Count	Severity	Incurred	Incidence	Severity	Incurred
1 - 3	56,309	121	12,714,787	2,737,918	127,708	15,452,706	100	119,004	11,924,308	121%	107%	130%
4 - 6	48,882	196	19,110,946	7,121,597	133,840	26,232,543	177	134,288	23,759,654	111%	100%	110%
7 - 9	41,924	303	17,842,676	21,799,281	130,832	39,641,957	247	146,485	36,162,621	123%	89%	110%
10 - 13	18,166	176	3,194,773	17,081,001	115,203	20,275,774	159	150,769	23,978,142	111%	76%	85%
Total	165,281	796	52,863,182	48,739,798	127,642	101,602,980	683	140,291	95,824,726	117%	91%	106%

Notes:

- 1) Experience is through June 30, 2015.
- 2) Paid claims represent the present value of paid claims discounted to the claim incurred date.
- 3) Reserve amounts represent the present value of the remaining claim reserve (including IBNR) discounted to the claim incurred date.
- 4) Severity is defined as incurred claims divided by the count of claims.
- 5) Expected Claims are the current best estimate assumptions used in the projections and are based on the Milliman 2011 Long-Term Care Guidelines including fitting factors.
- 6) Claim dollar amounts are discounted using a 4.5% interest rate (both actual and expected).
- 7) This exhibit excludes waiver of premium and return of premium benefits in both actual and expected results.

Appendix C
Exhibit 3
The Prudential Insurance Company of America
Claim Study
Experience by Attained Age
ILTC2

Attained Age	Total Lives	Count	Actual Claims			Expected Claims			Actual to Expected			
			Paid	Reserve	Severity	Incurred	Count	Severity	Incurred	Incidence	Severity	Incurred
<=59	61,083	60	7,645,387	6,870,858	241,937	14,516,245	31	251,076	7,781,859	194%	96%	187%
60-64	37,362	79	7,028,602	6,389,540	169,850	13,418,143	52	186,329	9,708,098	152%	91%	138%
65-69	33,483	112	8,324,413	8,675,153	151,782	16,999,566	102	160,084	16,344,751	110%	95%	104%
70-74	20,340	170	12,819,228	11,316,148	141,973	24,135,376	144	150,133	21,607,648	118%	95%	112%
75-79	8,899	160	8,250,401	8,769,081	106,372	17,019,482	156	127,959	20,003,602	102%	83%	85%
80-84	3,297	130	5,801,335	4,087,994	76,072	9,889,330	127	109,336	13,936,749	102%	70%	71%
85-89	758	75	2,559,748	2,230,808	63,874	4,790,555	63	94,943	5,940,181	120%	67%	81%
90+	58	10	434,068	400,215	83,428	834,283	8	66,381	501,839	132%	126%	166%
Total	165,281	796	52,863,182	48,739,798	127,642	101,602,980	683	140,291	95,824,726	117%	91%	106%

Notes:

- 1) Experience is through June 30, 2015.
- 2) Paid claims represent the present value of paid claims discounted to the claim incurred date.
- 3) Reserve amounts represent the present value of the remaining claim reserve (including IBNR) discounted to the claim incurred date.
- 4) Severity is defined as incurred claims divided by the count of claims.
- 5) Expected Claims are the current best estimate assumptions used in the projections and are based on the Milliman 2011 Long-Term Care Guidelines including fitting factors.
- 6) Claim dollar amounts are discounted using a 4.5% interest rate (both actual and expected).
- 7) This exhibit excludes waiver of premium and return of premium benefits in both actual and expected results.

Appendix D
The Prudential Insurance Company of America
Policy Persistency Comparison
Nationwide Experience
ILTC2

Policy Duration	Total Lives	Actual Results		Original Pricing Assumptions			Current Assumptions		
		Total Terminations	Total Terminations	Lapse	Mortality	Total Terminations	Lapse	Mortality	Total Terminations
1	19,849		6.9%	8.0%	0.8%	8.8%	5.5%	0.1%	5.6%
2	18,487		5.1%	5.0%	0.9%	5.9%	4.0%	0.2%	4.2%
3	17,547		4.0%	5.0%	1.0%	6.0%	3.5%	0.3%	3.8%
4	16,795		3.9%	5.0%	1.1%	6.1%	2.9%	0.4%	3.3%
5	16,026		3.1%	5.0%	1.2%	6.2%	2.3%	0.5%	2.8%
6	15,373		3.0%	3.0%	1.3%	4.3%	2.0%	0.6%	2.6%
7	14,762		2.7%	3.0%	1.4%	4.4%	1.9%	0.7%	2.6%
8	13,703		3.1%	3.0%	1.6%	4.6%	1.6%	0.8%	2.4%
9	11,131		2.9%	3.0%	1.8%	4.8%	1.4%	0.9%	2.3%
10	8,003		3.2%	3.0%	2.0%	5.0%	1.2%	1.1%	2.3%
11	3,326		3.3%	3.0%	2.3%	5.3%	1.2%	1.3%	2.5%
12	116		4.3%	3.0%	2.5%	5.5%	1.2%	1.5%	2.6%

Notes:

- 1) The "Actual Results" are the historical total policy termination rates observed by the Company.
- 2) The "Original Pricing Assumptions" are those assumptions originally used to price the product.
The mortality assumptions are based on the 1983 GAM Table.
The lapse assumptions vary by premium payment period. The original ultimate lapse rate starting in duration 6 were 3.0% for lifetime policies.
- 3) The "Current Assumptions" are those used in the projection for the current rate filing.
The mortality assumptions are based on the Annuity 2000 table, with selection factors, mortality attained age factors, and 0.6% mortality improvement per year (from year 2000)
The lapse assumptions vary by premium payment option, inflation and marital status. The current ultimate lapse rate starting in duration 21 ranges from 0.5% to 2.5%.
- 4) Experience is through June 30, 2015 and only includes lifetime pay policies (excludes limited pay policies).

Appendix E
The Prudential Insurance Company of America
Distribution of Inforce Business as of June 30, 2015
ILTC2

	Count	% of Count	Premium	% of Premium
Issue Year				
2002	12	0.1%	31,807	0.1%
2003	1,917	13.7%	4,962,227	12.8%
2004	4,415	31.5%	11,935,790	30.7%
2005	3,794	27.1%	10,687,119	27.5%
2006	1,951	13.9%	5,741,055	14.8%
2007	1,431	10.2%	4,147,727	10.7%
2008	231	1.6%	642,725	1.7%
2009	146	1.0%	409,392	1.1%
2010	64	0.5%	165,639	0.4%
2011	44	0.3%	106,079	0.3%
Total	14,005	100.0%	38,829,561	100.0%

Issue Age				
<30	42	0.3%	60,104	0.2%
30-34	99	0.7%	142,921	0.4%
35-39	219	1.6%	390,939	1.0%
40-44	539	3.8%	1,104,639	2.8%
45-49	1,244	8.9%	2,930,380	7.5%
50-54	2,511	17.9%	6,011,607	15.5%
55-59	3,466	24.7%	9,007,180	23.2%
60-64	3,239	23.1%	9,218,929	23.7%
65-69	1,687	12.0%	5,639,448	14.5%
70-74	690	4.9%	2,811,955	7.2%
75-79	233	1.7%	1,310,572	3.4%
80+	36	0.3%	200,886	0.5%
Total	14,005	100.0%	38,829,561	100.0%

Average Issue Age 57.5

Attained Age				
<30	7	0.0%	10,992	0.0%
30-34	13	0.1%	18,110	0.0%
35-39	34	0.2%	43,653	0.1%
40-44	107	0.8%	156,020	0.4%
45-49	229	1.6%	383,734	1.0%
50-54	534	3.8%	1,129,144	2.9%
55-59	1,244	8.9%	2,970,145	7.6%
60-64	2,448	17.5%	6,040,319	15.6%
65-69	3,419	24.4%	8,817,388	22.7%
70-74	3,161	22.6%	8,999,780	23.2%
75-79	1,745	12.5%	5,710,520	14.7%
80+	1,064	7.6%	4,549,756	11.7%
Total	14,005	100.0%	38,829,561	100.0%

Average Attained Age 67.7

Appendix E
The Prudential Insurance Company of America
Distribution of Inforce Business as of June 30, 2015
ILTC2

	Count	% of Count	Premium	% of Premium
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Gender

Male	5,643	40.3%	16,163,174	41.6%
Female	8,362	59.7%	22,666,387	58.4%
Total	14,005	100.0%	38,829,561	100.0%

Inflation Option

None	1,441	10.3%	3,537,599	9.1%
GPO	1,517	10.8%	4,351,736	11.2%
5% Simple Lifetime	3,964	28.3%	10,019,139	25.8%
5% Compound - Double (14 years)	1,279	9.1%	3,096,194	8.0%
5% Compound Lifetime	5,804	41.4%	17,824,892	45.9%
Total	14,005	100.0%	38,829,561	100.0%

Elimination Period

0-Day	36	0.3%	80,232	0.2%
30-Day	3,521	25.1%	10,178,453	28.1%
60-Day	1,624	11.6%	4,426,842	12.2%
90-Day	7,768	55.5%	21,581,123	59.5%
180-Day	1,056	7.5%	2,562,911	7.1%
Total	14,005	92.5%	36,266,650	100.0%

Benefit Period*

2 Years	452	3.2%	931,015	2.4%
3 Years	2,725	19.5%	5,904,032	15.2%
5 Years	5,697	40.7%	14,800,072	38.1%
Lifetime	5,131	36.6%	17,194,442	44.3%
Total	14,005	100.0%	38,829,561	100.0%

*Benefit Period grouped to nearest primary election

Premium Period

Lifetime	13,554	96.8%	35,634,199	91.8%
Premium Paid-Up at Age 65	91	0.6%	404,422	1.0%
Premium Reduction at Age 65	0	0.0%	0	0.0%
10-Pay	360	2.6%	2,790,940	7.2%
Total	14,005	100.0%	38,829,561	100.0%

Home Health Reimbursement Level

50%	382	2.7%	888,929	2.3%
75%	400	2.9%	948,560	2.4%
100%	13,223	94.4%	36,992,072	95.3%
Total	14,005	100.0%	38,829,561	100.0%

Appendix E
The Prudential Insurance Company of America
Distribution of Inforce Business as of June 30, 2015
ILTC2

	Count	% of Count	Premium	% of Premium
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Spousal Discount Status

Single	3,101	22.1%	9,770,451	25.2%
Married - 1 Buy	2,999	21.4%	8,953,375	23.1%
Married - 2 Buy	7,905	56.4%	20,105,735	51.8%
Total	14,005	100.0%	38,829,561	100.0%

Cash Benefit Option

Cash	1,714	12.2%	6,566,063	16.9%
Reimbursement	12,291	87.8%	32,263,498	83.1%
Total	14,005	100.0%	38,829,561	100.0%

Benefit Measure

Daily	3,291	23.5%	8,279,721	21.3%
Monthly	10,714	76.5%	30,549,840	78.7%
Total	14,005	100.0%	38,829,561	100.0%

Non-Forfeiture Option

Yes	494	3.5%	1,385,848	3.6%
No	13,511	96.5%	37,443,713	96.4%
Total	14,005	100.0%	38,829,561	100.0%

Survivorship Rider

Yes	467	3.3%	1,180,051	3.0%
No	13,538	96.7%	37,649,510	97.0%
Total	14,005	100.0%	38,829,561	100.0%

Dual Waiver of Premium Rider

Yes	2,169	15.5%	5,611,738	14.5%
No	11,836	84.5%	33,217,823	85.5%
Total	14,005	100.0%	38,829,561	100.0%