

**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

## Filing at a Glance

Company: RiverSource Life Insurance Company  
Product Name: Long Term Care  
State: Virginia  
TOI: LTC03I Individual Long Term Care  
Sub-TOI: LTC03I.001 Qualified  
Filing Type: Rate  
Date Submitted: 08/01/2013  
SERFF Tr Num: AERS-129009910  
SERFF Status: Closed-Approved  
State Tr Num: AERS-129009910  
State Status: Approved  
Co Tr Num: 30160A.32100 2013

Implementation: On Approval  
Date Requested:  
Author(s): Jeff Pederson, Cheryl Meyer, Kathleen Felton  
Reviewer(s): Janet Houser (primary)  
Disposition Date: 12/03/2014  
Disposition Status: Approved  
Implementation Date:

**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

### General Information

Project Name: 30160A.32100 2013	Status of Filing in Domicile: Not Filed
Project Number: 30160A.32100 2013	Date Approved in Domicile:
Requested Filing Mode: Review & Approval	Domicile Status Comments:
Explanation for Combination/Other:	Market Type: Individual
Submission Type: New Submission	Individual Market Type:
Overall Rate Impact: 10%	Filing Status Changed: 12/03/2014
	State Status Changed: 12/03/2014
Deemer Date:	Created By: Cheryl Meyer
Submitted By: Cheryl Meyer	Corresponding Filing Tracking Number:
	State TOI: LTC03I Individual Long Term Care

Filing Description:  
Please see cover letter.

### Company and Contact

#### Filing Contact Information

Cheryl Meyer, Sr. Contract Analyst	Cheryl.D.Meyer@ampf.com
9550 Ameriprise Financial Center	612-671-5583 [Phone]
H25/9550	612-678-0034 [FAX]
Minneapolis, MN 55474	

#### Filing Company Information

RiverSource Life Insurance	CoCode: 65005	State of Domicile: Minnesota
Company	Group Code: 4	Company Type: Life
9550 Ameriprise Financial Center,	Group Name:	State ID Number:
H22/9550	FEIN Number: 41-0823832	
Minneapolis, MN 55474		
(612) 671-2465 ext. [Phone]		

### Filing Fees

Fee Required? No  
 Retaliatory? No  
 Fee Explanation:

**State:** Virginia  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

**Filing Company:** RiverSource Life Insurance Company

## Correspondence Summary

### Dispositions

Status	Created By	Created On	Date Submitted
Approved	Janet Houser	12/03/2014	12/03/2014

### Objection Letters and Response Letters

#### Objection Letters

Status	Created By	Created On	Date Submitted
Info has been requested from company	Janet Houser	03/24/2014	03/24/2014
Info has been requested from company	Janet Houser	02/25/2014	02/25/2014
Disapproved	Janet Houser	01/14/2014	01/14/2014
Disapproved	Bob Grissom	08/05/2013	08/05/2013

#### Response Letters

Responded By	Created On	Date Submitted
Cheryl Meyer	05/30/2014	05/30/2014
Cheryl Meyer	03/04/2014	03/04/2014
Cheryl Meyer	02/19/2014	02/19/2014
Cheryl Meyer	12/03/2013	12/03/2013

### Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
status	Note To Reviewer	Cheryl Meyer	11/24/2014	11/24/2014
status	Note To Filer	Janet Houser	07/10/2014	07/10/2014
status	Note To Reviewer	Cheryl Meyer	07/09/2014	07/09/2014
Overall Percent Change in SERFF	Note To Reviewer	Cheryl Meyer	01/14/2014	01/14/2014
The Overall Percent Change In SERFF	Note To Filer	Janet Houser	01/14/2014	01/14/2014
RRS	Reviewer Note	Janet Houser	12/03/2014	
Rate Summary Part 1 correction	Reviewer Note	Janet Houser	12/01/2014	
policyholder letters	Reviewer Note	Janet Houser	06/30/2014	
rate summary part II	Reviewer Note	Janet Houser	01/07/2014	
act review	Reviewer Note	Janet Houser	01/07/2014	

**State:** Virginia

**Filing Company:** RiverSource Life Insurance Company

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

**Product Name:** Long Term Care

**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

## Disposition

Disposition Date: 12/03/2014

Implementation Date:

Status: Approved

Comment:

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):
RiverSource Life Insurance Company	95.200%	10.000%	\$278,400	1,647	\$2,784,003	10.000%	10.000%

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Certification of Compliance	Received & Acknowledged	Yes
Supporting Document (revised)	L&H Actuarial Memorandum	Received & Acknowledged	Yes
Supporting Document	Cover Letters and Third Party Document	Received & Acknowledged	Yes
Supporting Document	Rate Revision Check List	Received & Acknowledged	Yes
Supporting Document	Response 12-3-13	Received & Acknowledged	Yes
Supporting Document	Response 2-19-14	Received & Acknowledged	Yes
Supporting Document	Response 3-4-14	Received & Acknowledged	Yes
Supporting Document	Response 5-30-14	Received & Acknowledged	Yes
Supporting Document	L&H Actuarial Memorandum	Withdrawn	Yes
Supporting Document	L&H Actuarial Memorandum	Withdrawn	Yes
Rate (revised)	VA ExhibitXIII Premiums 30160A 32100	Approved	Yes
Rate	VA ExhibitXIII Premiums 30160A 32100	Withdrawn	Yes

**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

## Objection Letter

Objection Letter Status Info has been requested from company  
Objection Letter Date 03/24/2014  
Submitted Date 03/24/2014  
Respond By Date

Dear Cheryl Meyer,

### **Introduction:**

In response to recent reply to our request for additional information, we still have the following concerns:

1) Thank you providing additional information regarding the policyholder notification letters. We agree LTC is a complicated product and appreciate the fact the company has had numerous resources involved in the development of this correspondence. The State Corporation Commission has an outstanding order to the BOI to obtain comments from the general public regarding long term care rates and proposed amendments. The BOI takes this very seriously, and based on both written and verbal comments received from our consumers and the national level of interest in this product, the management of the BIO has provided direction regarding such letters.

In light of this, we again request the letters be modified to explain why anticipated claims are higher than expected. The drivers should be identified in language that anyone without an insurance background can easily understand in consumer friendly language.

In regards to the FAQ, we withdraw our concern regarding the reference to both RiverSource Life Insurance Company and RiverSource Life Insurance Co. of New York.

Although we may agree the response to question 5 in the FAQ may be correct, it is also misleading. The management at the BOI feels this statement should more clearly reflect our role in this process by stating we reviewed this request for compliance with applicable state laws and regulations, and because it was compliant, the filing was approved.

2) Attached is a NAIC's Executive/Plenary bulletin adopted on December 18, 2013. We have now added this to our review process and ask that the company advise if this filing is or is not consistent with the recommendations. Please provide details that support your response.

3) As stated previously, the State Corporation Commission has an outstanding order to the BOI to obtain comments from the general public regarding long term care rates and proposed amendments. Because of feedback from our consumers, we have asked our insurers to now complete the Rate Rule Summary which the company did. We realize this is a new exercise for you; however, this one way to provide our consumers a better explanation as to why a rate increase was requested and what were the contributing causes. As a result, we ask this form be amended to more accurately reflect this information in a more consumer friendly manner.

### **Conclusion:**

We shall be glad to reconsider this submission upon receipt of the information noted above. Should you need clarification of any of the information contained in this letter, please contact the undersigned.

Thank you for your courtesy and consideration in this matter.

Sincerely,  
Janet Houser

## MODEL BULLETIN

DATE: [Insert Date]

TO: All Licensed Insurers Writing Long-Term Care Insurance

FROM: [Insert Name & Title]

RE: Announcement of Alternative Filing Requirements for Long-Term Care Premium Rate Increases

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Effective *[insert date three (3) months after issuance of this bulletin]*, the following guidelines will be used in the review of pre-rate-stability and post-rate-stability premium rate adjustment filings for long-term care insurance policies. The intent of this bulletin is to address rate increases for long-term care insurance policies currently in force, in particular pre-rate-stability policies.

For purposes of this bulletin, “rate stability” is defined as provisions contained in the 2000 NAIC Long-Term Care Insurance Model Regulation (Model 641) as adopted by *[insert state name]* on *[insert date of adoption of Section 20 et al]*. Policies with effective dates prior to *[insert rate stability adoption date]* are referred to as “pre-rate-stability” policies, and policies with effective dates on or after *[insert rate stability adoption date]* are referred to as “post-rate-stability” policies.

**Drafting Note:** States may need to consider whether their state rules allow these provisions to be issued as a bulletin, or whether some or all of these provisions may require adoption through other state regulatory procedures.

### **Actuarial Assumptions for Establishing Rate Increase Requests:**

When rate adjustments are filed with the [Department] for both pre-rate-stability and post-rate-stability policy forms, it is the intent of the [Department] to work with the insurer, to the extent appropriate, to review the reasonableness of the set of assumptions by which to determine the rate increase(s) necessary to reach adequate ultimate premiums and that can be used to monitor developing experience. When disclosing assumptions to the [Department], the insurer will provide the resulting rate revision request at the same time so that the [Department] may include this in their review.

In assessing these assumptions as proposed by the insurer, the [Department] may use the services of an independent actuary and, if appropriate under state law, may charge the insurer for the costs of these services. The [Department] may also accept a review done by or for another state or states for the same or substantially the same policy form where any differences in benefits and premiums are not material and such review was completed within eighteen months of the date of the rate adjustment filing and such review substantially complies with the [Department]’s rate review standards.

The assumptions will be consistent with the following:

1. All present and accumulated values used to determine rate increases shall use the maximum valuation interest rate for contract reserves. The actuary shall disclose as part of the actuarial memorandum the use of any averages.
2. All accumulated values used to determine rate increases shall use the actual experience of the product in as close a manner to that used in the original development of rates as possible. This is not intended to preclude the inclusion of multiple policy forms into one rate increase determination if such pooling increases the credibility of the combined accumulated experience.
3. All present values calculated to determine rate increases shall use reasonable estimates of future premium payments and claims payments. Such estimates are to be part of the assumptions as anticipated above and, for post-rate-stability policies this would include a margin for moderately adverse experience, while for pre-rate-stability policies, this would be based on best estimate assumptions for the future lifetime of the policies, including potential margins.

**Drafting Note:** While not limiting each state's authority with respect to the approval of rate increases, the intention of the development of a set of assumptions is to increase the uniformity and fairness of premium rate schedule changes for all policyholders regardless of the state of issue of each policy or the current state of residence.

### **Approval of Rate Increases:**

In approving rate increase requests for both pre-rate-stability policies and post-rate-stability policies consistent with the assumptions described in the section above, the [Department], with the concurrence of the insurer where such concurrence is appropriate, will determine ways in which the following may be included to benefit policyholders:

1. The [Department] may approve a single increase of the requested amount and the insurer agrees to not implement future rate increases on each subject policy for three years from the date of implementation of the rate increase for each policy form; or
2. In lieu of a single increase, the [Department] may approve a series of scheduled rate increases that are actuarially equivalent to the single amount requested by the insurer over the lifetime of the policy. The entire series would be approved at one time as part of the current rate increase filing. For pre-rate-stability policy forms, the approval includes a three-year monitoring provision similar to that currently applicable to post-rate-stability rate increases to allow modification of later increases that were not appropriate based on the experience following the initial rate increase. When determining the rate comparison for new business, forms subject to a series of increases shall not be included.

### **Requirement to Administer Contingent Benefit Upon Lapse:**

For pre-rate-stability policies, the [Department] will require the implementation of the contingent benefit upon lapse<sup>1</sup> as outlined below, as a condition of approval of a rate increase for a block of business for which the contingent benefit upon lapse is not otherwise required. The contingent benefit upon lapse is already required for post-rate-stability policies.

For both pre-rate-stability and post-rate-stability policies, if the rate increase is approved in a series of scheduled rate increases and the sum of all scheduled rate increases would ultimately trigger the offering of the contingent benefit upon lapse, the insurer will be required<sup>2</sup> to include contingent benefit upon lapse at the time of each scheduled increase.

For policies or certificates which have reached their twentieth duration, the [Department] may require the insurer to provide the contingent benefit upon lapse<sup>3</sup> without reference to the table of trigger percentages. For policies which have not reached their twentieth duration, any percentage value in excess of 100% will be reduced to 100%.

The insurer shall notify policyholders and certificate holders of the contingent benefit upon lapse when required by the [Department] in conjunction with the implementation of a rate increase.

### **Policyholder Notification of Premium Increase:**

The insurer shall file with the [Department] the premium increase notification letter to policyholders at the time of the premium rate increase for informational purposes. The insurer shall clearly disclose to policyholders the following elements:

1. the amount of the premium rate increase requested and implementation schedule (e.g., single premium increase applied or phased in a series of premium increases);
2. available benefit reduction/rate increase mitigation actions;
3. clear disclosure addressing the guaranteed renewable nature of the policy/coverage and that the insured should understand that premium rates may increase again in the future; and
4. offer of contingent benefit upon lapse, if applicable.

### **Application of New Loss Ratio Standards:**

The [Department] will require the insurer to limit the increase based on the use of a dual loss-ratio approach for pre-rate-stability policy forms. The recommended loss-ratio would be:

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<sup>1</sup> A company may provide alternative nonforfeiture benefits in lieu of the benefit required by the contingent benefit upon lapse, if approved by the [Commissioner].

<sup>2</sup> Any such additional requirements, with respect to contingent benefit upon lapse, shall not change the determination of whether or not a majority of policies or certificates are eligible for contingent benefit upon lapse.

<sup>3</sup> A company may provide alternative nonforfeiture benefits in lieu of the benefit required by the contingent benefit upon lapse, if approved by the [Commissioner].

- the greater of 60% or the lifetime loss ratio used in the original pricing, applied to the current rate schedule on the effective date of these new requirements; plus
- 80% applied to any premium increase that is filed after that date on an individual policy form; or
- 75% applied to any premium increase that is filed on a group policy form.

For post-rate-stability policy forms, the current loss-ratio standards are unchanged.

**Consideration of New Approaches:**

At the request of the insurer, the [Department] may also consider other options which may be made available to insureds which may mitigate the impact of the rate increases on the insured population or alternative actuarial methodologies relating to the rate increase. The insurer shall provide an explanation and demonstration on how such methodology is actuarially justified and/or how such new mitigation option may reasonably benefit insureds. No alternative method/approach may be used until it has been accepted by the [Department].

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(INSERT COMMISSIONER NAME)  
(INSERT COMMISSIONER TITLE)  
(INSERT STATE NAME)

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**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

## Objection Letter

Objection Letter Status	Info has been requested from company
Objection Letter Date	02/25/2014
Submitted Date	02/25/2014
Respond By Date	

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Dear Cheryl Meyer,

**Introduction:**

Thank you for your providing us a copy of the policyholder letters as requested. In reviewing the letters, we have two concerns:

1) Please provide more detail in the policyholder letter regarding the explanation for the rate increase in consumer friendly language. Please keep in mind, as an indemnity policy, the benefit payment remains the same; and for that insured, it would be difficult to understand why higher claim payments would affect his policy. According to the Actuarial Memorandum, the driving forces behind the rate increase are that morbidity is higher than originally anticipated, mortality less than anticipated and policy persistency greater than anticipated. In other words, individuals are living longer and keeping their policies in force and filing more claims than anticipated when this policy was originally priced. As a result, premiums must be adjusted to ensure current and future claims are adequately funded.

2) The answer to question 5 on the FAQ is somewhat confusing since it refers to both RiverSource Life Insurance Company and RiverSource Life of NY. We suggest the following changes: Remove the sentence that begins with "If the state insurance regulatory..." as well as the following sentence and replace this with "The state insurance regulatory authority reviewed the filing for compliance with applicable state laws and regulations, and because it was found to be compliant, approved our request for RiverSource Life Insurance Company."

**Conclusion:**

We shall be glad to reconsider this submission upon receipt of the revised forms to address the objections noted above. Should you need clarification of any of the information contained in this letter, please contact the undersigned.

Thank you for your courtesy and consideration in this matter.

Sincerely,  
Janet Houser

**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

## Objection Letter

Objection Letter Status Disapproved  
Objection Letter Date 01/14/2014  
Submitted Date 01/14/2014  
Respond By Date

Dear Cheryl Meyer,

### **Introduction:**

Thank you for your recent reply to our request for additional information. Before further consideration may be given, please provide the following:

### **Objection 1**

*Comments: Before rates may be approved, please complete the attached Rate Summary. This form is now required for Long Term Care rate filings. Our expectation is that the form would put into consumer friendly language a clear explanation of the justification for the rate increase. This should be fairly high level and not drill down deep into the details but at least explain to the consumer the assumptions and changes that are driving the need for an increase.*

### **Objection 2**

*Comments: Please provide a copy of the premium rate increase letter that will be sent to the policyholders and/or a list of FAQs that it will make available to its customer service representatives in anticipation of calls from consumers.*

*If approved, please explain what, if any, options will be offered to the policyholders in lieu of accepting the rate increase. Should options be made available, please be aware prior to approving the proposed rate increase, forms used to amend existing coverage will need to be filed for review and approval. If forms are not already approved, this can either be done as a separate filing or the company can amend this filing to include it. Any submitted form will need to comply with the filing requirements of Chapter 100 of the Virginia Administrative Code. If the forms are already approved, please provide the form number as approved in Virginia, the SERFF tracking number and date of its approval.*

### **Objection 3**

*- Cover Letter and Third Party Document (Supporting Document)*

*Comments: Please refer to Administrative Letter 2012-03, copy attached, which requires all submissions to include certain specific information in the Filing Description section. Please note that a transmittal letter attached as supporting documentation no longer fulfills this requirement. This change will need to be made in future filings or they will be rejected.*

### **Objection 4**

*- L&H Actuarial Memorandum (Supporting Document)*

*Comments: The Actuarial Certification indicates premiums are reasonable to the benefits provided in 14 VAC 5-130-70(C). Please be aware that 14 VAC5-200-150 B states benefits under individual long term care insurance policies shall be deemed reasonable in relation to premiums provided the expected loss ratio is at least 60% calculated in a manner which provides for adequate reserving of the long-term care insurance risk. The regulation then provides what factors should be considered. Please amend the certification accordingly.*

### **Conclusion:**

We shall be glad to reconsider this submission upon receipt of the information noted above. Should you need clarification of any of the information contained in this letter, please contact the undersigned.

Thank you for your courtesy and consideration in this matter.

**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

Sincerely,  
Janet Houser

# COMMONWEALTH OF VIRGINIA

JACQUELINE K. CUNNINGHAM  
COMMISSIONER OF INSURANCE  
STATE CORPORATION COMMISSION  
BUREAU OF INSURANCE



P.O. BOX 1157  
RICHMOND, VIRGINIA 23218  
TELEPHONE: (804) 371-9741  
TDD/VOICE: (804) 371-9206  
[www.scc.virginia.gov/boi](http://www.scc.virginia.gov/boi)

March 28, 2012

Administrative Letter 2012-03

To: All Insurers Licensed in Virginia and Other Interested Parties

Re: Implementation of Search Options for Rate and Form Submissions and Establishment of Additional Filing Requirements

In accordance with our ongoing efforts to educate and inform Virginia's insurance consumers, we will soon launch a new website function for viewing information about rate and form submissions on file with the Bureau of Insurance (the Bureau). The purpose of this administrative letter is to apprise all carriers and interested parties of the availability of this new function, and to notify carriers of additional filing requirements that will be necessary in order to display clear and succinct information through this new website application. We anticipate this new functionality, which will consist of two separate search options described below, to be available on or around May 1, 2012. **Additional filing requirements described further in this letter are effective immediately.**

The following two search options, which will be accessed through the link also shown below, will be provided to users of this new website function:

[www.scc.virginia.gov/boi/SERFFInquiry/](http://www.scc.virginia.gov/boi/SERFFInquiry/)

### Search Option 1 - Public Access to General Information about Rate and Form Submissions:

General information about submissions filed with the Bureau will be available through this search option, but direct access to the rates or forms will not be included. It will still be necessary to contact the Bureau for copies of publicly available rates and forms.

### Search Option 2 - Public Access to PPACA Forms and Rates and Associated Supporting Documentation:

Rates and forms associated with accident and sickness insurance products that are subject to the requirements of the federal Patient Protection Affordable Care Act (PPACA), along with related supporting documentation, will be available for viewing through this option.

### **Additional Filing Requirements**

In order to ensure that there is meaningful information available to the public, additional filing requirements have been established for the Filing Description section in SERFF. Any SERFF submission that does not include a properly completed Filing Description will be **rejected**. Filings submitted via mail must also contain this information or the submission will be **rejected**. The required information is listed below:

- *All submissions* filed with the Life and Health Division or the Property and Casualty Division must provide a brief summary of the filing, including a statement describing whether the materials in the filing are new, revisions of existing materials or are additional materials that will be used with previously filed or approved rates or forms in Virginia.

- *All rate submissions* filed with the Life and Health Division involving a rate change must include (i) a statement regarding whether the change is an increase, decrease, or revision of former rates, (ii) the percentage amount(s) of the change(s), (iii) the number of affected policyholders, and (iv) the reason for the proposed change(s).
- *All form submissions* filed with the Life and Health Division must include (i) a description of each form (i.e., form name, title, and edition date) and the intended use of the form, (ii) identification of any change in benefits and premiums which occurs while the form is in force with a reference to the contract provisions which describe the benefit change, (iii) to the extent practicable, the SERFF or State Tracking number of the approved form that the new form revises or replaces, or the SERFF or State Tracking number of the approved form(s) with which the new forms will be used, and (iv) a statement as to whether any other regulatory body has withdrawn approval of the form because the form contains one or more provisions that were deemed to be misleading, deceptive or contrary to public policy.

Questions regarding this letter and the filing requirements for submissions to the Life and Health Division may be directed to:

Bob Grissom  
Chief Insurance Market Examiner  
Life and Health Division  
(804) 371-9152  
[bob.grissom@scc.virginia.gov](mailto:bob.grissom@scc.virginia.gov)

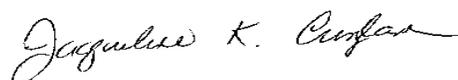
Questions regarding this letter and the filing requirements for submissions to the Property and Casualty Division may be directed to:

Rebecca Nichols, CPCU, CIC, CIE, AIC, CCP, ALMI  
Principal Insurance Market Examiner  
Property and Casualty Division  
(804) 371-9331  
[rebecca.nichols@scc.virginia.gov](mailto:rebecca.nichols@scc.virginia.gov)

Questions regarding the functionality of the search options may be directed to:

Trish Todd, CPCU, AIE, AIC  
Senior Insurance Market Examiner  
Automated Systems  
(804) 371-9195  
[trish.todd@scc.virginia.gov](mailto:trish.todd@scc.virginia.gov)

Sincerely,



Jacqueline K. Cunningham  
Commissioner of Insurance



**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
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## Objection Letter

Objection Letter Status Disapproved  
Objection Letter Date 08/05/2013  
Submitted Date 08/05/2013  
Respond By Date

Dear Cheryl Meyer,

**Introduction:**

We'll continue our review upon receipt of the company's responses. Let me know if you have any questions.

*Has the company addressed all objections raised in the prior rate filing?*

*Please provide documentation supporting the company's assertion that a 121.8% rate increase is justified.*

*Please state the lifetime loss ratio anticipated in the original filing and, if applicable, an explanation why the current projected loss ratio is less than the originally anticipated.*

*Please provide an explanation as to why an additional rate increase is needed and a comparison of the differences in the assumptions used in the prior filing with those actually experienced included.*

*If the experience develops as projected, or close to it, will the company request additional rate increases?*

*Provide a separate calculation of the Lifetime Loss Ratio so that the historical premium component is restated to what it would be if the proposed premium had been charged (collected) since the forms' introduction.*

*Sufficient detail or documentation provided so that any projections can be recreated. Excel file that show all calculations should be provided where applicable*

*Please advise in what states the company has requested rate increases on this block, how the rate changes requested in Virginia compare with those requested in other states, and the current status of the reviews in other states.*

*Please provide an explanation of what steps the company has taken to minimize rate increases on this block of business?*

*Please explain what, if any, margins are included in the proposed rates to ensure that future rate increases will not be needed presuming the experience develops as projected.*

*Provide the anticipated future loss ratio where the numerator is equal to the anticipated incurred claims less the policy reserves, and the denominator is equal to the anticipated future earned premium.*

**Conclusion:**

Sincerely,  
Bob Grissom

SERFF Tracking #:

AERS-129009910

State Tracking #:

AERS-129009910

Company Tracking #:

30160A.32100 2013

State:

Virginia

Filing Company:

RiverSource Life Insurance Company

TOI/Sub-TOI:

LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name:

Long Term Care

Project Name/Number:

30160A.32100 2013/30160A.32100 2013

## Response Letter

Response Letter Status	Submitted to State
Response Letter Date	05/30/2014
Submitted Date	05/30/2014

Dear Janet Houser,

**Introduction:**

Thank you for the letter of 3-24-14.

**Response 1**

**Comments:**

Please see the attached response.

**Changed Items:**

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	L&H Actuarial Memorandum
<b>Comments:</b>	
<b>Attachment(s):</b>	VA Revised_ActMem_30160A_32100_20140530.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	L&H Actuarial Memorandum
<b>Comments:</b>	
<b>Attachment(s):</b>	VA Revised_ActMem_30160A_32100_20140219.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	L&H Actuarial Memorandum
<b>Comments:</b>	
<b>Attachment(s):</b>	VA ActMem_30160A_32100_20130801.pdf

State: Virginia Filing Company: RiverSource Life Insurance Company  
 TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified  
 Product Name: Long Term Care  
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**Supporting Document Schedule Item Changes**

<b>Satisfied - Item:</b>	L&H Actuarial Memorandum
<b>Comments:</b>	
<b>Attachment(s):</b>	VA Revised_ActMem_30160A_32100_20140530.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>L&amp;H Actuarial Memorandum</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>VA Revised_ActMem_30160A_32100_20140219.pdf</i>
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>L&amp;H Actuarial Memorandum</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>VA ActMem_30160A_32100_20130801.pdf</i>

<b>Satisfied - Item:</b>	Response 5-30-14
<b>Comments:</b>	
<b>Attachment(s):</b>	VA Response_30160A_32100_20140530.pdf VA Rate Request Summary_30160A_32100_20140530.pdf Revised Sample LTC Policyholder Notification Letter - On Waiver.pdf Revised Sample LTC Policyholder Notification Letter - Not On Waiver.pdf LTC Rate Increase Policyholder Q&A.pdf

No Form Schedule items changed.

**SERFF Tracking #:**

AERS-129009910

**State Tracking #:**

AERS-129009910

**Company Tracking #:**

30160A.32100 2013

**State:**

Virginia

**Filing Company:**

RiverSource Life Insurance Company

**TOI/Sub-TOI:**

LTC03I Individual Long Term Care/LTC03I.001 Qualified

**Product Name:**

Long Term Care

**Project Name/Number:**

30160A.32100 2013/30160A.32100 2013

**Rate/Rule Schedule Item Changes**

Item No.	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments	Date Submitted
1	VA ExhibitXIII Premiums 30160A 32100	30160A-VA, 32100	Revised	Previous State Filing Number: AERS-126909943 Percent Rate Change Request: 10	VA ExhXIV_Premiums_30160A_32100_20140530.pdf,	05/30/2014 By: Cheryl Meyer
<i>Previous Version</i>						
1	VA ExhibitXIII Premiums 30160A 32100	30160A-VA, 32100	Revised	Previous State Filing Number: AERS-126909943 Percent Rate Change Request: 10	VA ExhXIII_Premiums_30160A_32100_20130801.pdf,	08/01/2013 By: Cheryl Meyer

**Conclusion:**

Thank you.

Sincerely,

Cheryl Meyer

SERFF Tracking #:

AERS-129009910

State Tracking #:

AERS-129009910

Company Tracking #:

30160A.32100 2013

State:

Virginia

Filing Company:

RiverSource Life Insurance Company

TOI/Sub-TOI:

LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name:

Long Term Care

Project Name/Number:

30160A.32100 2013/30160A.32100 2013

## Response Letter

Response Letter Status

Submitted to State

Response Letter Date

03/04/2014

Submitted Date

03/04/2014

*Dear Janet Houser,*

**Introduction:**

*Thank you for the letter of 2-25-14.*

**Response 1**

**Comments:**

*Please see attached response.*

**Changed Items:**

Supporting Document Schedule Item Changes	
Satisfied - Item:	Response 3-4-14
Comments:	
Attachment(s):	VA Response_30160A_32100_20140304.pdf

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

**Conclusion:**

*Thank you.*

*Sincerely,*

*Cheryl Meyer*

SERFF Tracking #:

AERS-129009910

State Tracking #:

AERS-129009910

Company Tracking #:

30160A.32100 2013

State:

Virginia

Filing Company:

RiverSource Life Insurance Company

TOI/Sub-TOI:

LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name:

Long Term Care

Project Name/Number:

30160A.32100 2013/30160A.32100 2013

## Response Letter

Response Letter Status

Submitted to State

Response Letter Date

02/19/2014

Submitted Date

02/19/2014

Dear Janet Houser,

### Introduction:

Thank you for the letter of 1-14-14.

### Response 1

#### Comments:

Please see the attached response.

### Related Objection 1

Comments: Before rates may be approved, please complete the attached Rate Summary. This form is now required for Long Term Care rate filings. Our expectation is that the form would put into consumer friendly language a clear explanation of the justification for the rate increase. This should be fairly high level and not drill down deep into the details but at least explain to the consumer the assumptions and changes that are driving the need for an increase.

### Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Response 2-19-14
Comments:	
Attachment(s):	VA Response_30160A_32100_20140219.pdf LTC Rate Increase Policyholder Q&A.pdf Sample LTC Policyholder Notification Letter - On Waiver.pdf Sample LTC Policyholder Notification Letter - Not On Waiver.pdf VA Rate Request Summary_30160A_32100_20140219.pdf

SERFF Tracking #:

AERS-129009910

State Tracking #:

AERS-129009910

Company Tracking #:

30160A.32100 2013

State:

Virginia

Filing Company:

RiverSource Life Insurance Company

TOI/Sub-TOI:

LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name:

Long Term Care

Project Name/Number:

30160A.32100 2013/30160A.32100 2013

**Supporting Document Schedule Item Changes**

<b>Satisfied - Item:</b>	Response 2-19-14
<b>Comments:</b>	
<b>Attachment(s):</b>	VA Response_30160A_32100_20140219.pdf LTC Rate Increase Policyholder Q&A.pdf Sample LTC Policyholder Notification Letter - On Waiver.pdf Sample LTC Policyholder Notification Letter - Not On Waiver.pdf VA Rate Request Summary_30160A_32100_20140219.pdf
<b>Satisfied - Item:</b>	L&H Actuarial Memorandum
<b>Comments:</b>	
<b>Attachment(s):</b>	VA Revised_ActMem_30160A_32100_20140219.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>L&amp;H Actuarial Memorandum</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>VA ActMem_30160A_32100_20130801.pdf</i>

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

**Response 2**

**Comments:**

Please see the response attached in objection 1.

**Related Objection 2**

Comments: Please provide a copy of the premium rate increase letter that will be sent to the policyholders and/or a list of FAQs that it will make available to its customer service representatives in anticipation of calls from consumers.

If approved, please explain what, if any, options will be offered to the policyholders in lieu of accepting the rate increase. Should options be made available, please be aware prior to approving the proposed rate increase, forms used to amend existing coverage will need to be filed for review and approval. If forms are not already approved, this can either be done as a separate filing or the company can amend this filing to include it. Any submitted form will need to comply with the filing requirements of Chapter 100 of the Virginia Administrative Code. If the forms are already approved, please provide the form number as approved in Virginia, the SERFF tracking number and date of its approval.

**Changed Items:**

No Supporting Documents changed.

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**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

### Response 3

#### Comments:

Please see the response attached in objection 1.

### Related Objection 3

Applies To:

- Cover Letter and Third Party Document (Supporting Document)

Comments: Please refer to Administrative Letter 2012-03, copy attached, which requires all submissions to include certain specific information in the Filing Description section. Please note that a transmittal letter attached as supporting documentation no longer fulfills this requirement. This change will need to be made in future filings or they will be rejected.

### Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

### Response 4

#### Comments:

Please see the response attached in objection 1.

### Related Objection 4

Applies To:

- L&H Actuarial Memorandum (Supporting Document)

Comments: The Actuarial Certification indicates premiums are reasonable to the benefits provided in 14 VAC 5-130-70(C). Please be aware that 14 VAC5-200-150 B states benefits under individual long term care insurance policies shall be deemed reasonable in relation to premiums provided the expected loss ratio is at least 60% calculated in a manner which provides for adequate reserving of the long-term care insurance risk. The regulation then provides what factors should be considered. Please amend the certification accordingly.

### Changed Items:

**SERFF Tracking #:**

AERS-129009910

**State Tracking #:**

AERS-129009910

**Company Tracking #:**

30160A.32100 2013

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**State:**

Virginia

**Filing Company:**

RiverSource Life Insurance Company

**TOI/Sub-TOI:**

LTC03I Individual Long Term Care/LTC03I.001 Qualified

**Product Name:**

Long Term Care

**Project Name/Number:**

30160A.32100 2013/30160A.32100 2013

*No Supporting Documents changed.*

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

**Conclusion:**

*Thank you.*

*Sincerely,*

*Cheryl Meyer*

State: Virginia Filing Company: RiverSource Life Insurance Company  
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified  
Product Name: Long Term Care  
Project Name/Number: 30160A.32100 2013/30160A.32100 2013

## Response Letter

Response Letter Status Submitted to State  
Response Letter Date 12/03/2013  
Submitted Date 12/03/2013

Dear Janet Houser,

**Introduction:**

Thank you for the letter of 8-5-13.

**Response 1**

**Comments:**

Please see attached response.

**Changed Items:**

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Response 12-3-13
<b>Comments:</b>	
<b>Attachment(s):</b>	VA Response_30160A_32100_20131203.pdf VA Response_Attachments_30160A_32100_20131203.xlsx

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

**Conclusion:**

Thank you.

Sincerely,

Cheryl Meyer

---

**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

## Note To Reviewer

**Created By:**

Cheryl Meyer on 11/24/2014 03:16 PM

**Last Edited By:**

Cheryl Meyer

**Submitted On:**

11/24/2014 03:16 PM

**Subject:**

status

**Comments:**

Hello,

We are inquiring as to the status of the filing. We appreciate any updates you may have on timeframe for review.

Best Regards,  
Cheryl Meyer

---

**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

## Note To Filer

**Created By:**

Janet Houser on 07/10/2014 07:47 AM

**Last Edited By:**

Janet Houser

**Submitted On:**

07/10/2014 07:52 AM

**Subject:**

status

**Comments:**

The filing is still under review with the management of the Bureau of Insurance. I apologize for the delay and thank you for your patience in this matter.

Janet Houser  
804-371-9390

---

**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

## Note To Reviewer

**Created By:**

Cheryl Meyer on 07/09/2014 11:58 AM

**Last Edited By:**

Cheryl Meyer

**Submitted On:**

07/09/2014 11:58 AM

**Subject:**

status

**Comments:**

Hello,

We are taking the opportunity to check in on the status of the filing. We appreciate any updates you may have on the filing.

Best Regards,  
Cheryl Meyer

---

**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

## Note To Reviewer

**Created By:**

Cheryl Meyer on 01/14/2014 04:42 PM

**Last Edited By:**

Cheryl Meyer

**Submitted On:**

01/14/2014 04:42 PM

**Subject:**

Overall Percent Change in SERFF

**Comments:**

Thank you for the follow up note on updating the subject field. The post submission update has been submitted to reflect this update in accordance with the response submitted 12/3/13.

Best Regards,  
Cheryl Meyer

---

**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

## Note To Filer

**Created By:**

Janet Houser on 01/14/2014 01:43 PM

**Last Edited By:**

Janet Houser

**Submitted On:**

01/14/2014 01:43 PM

**Subject:**

The Overall Percent Change In SERFF

**Comments:**

According to your December 3, 2013 response to objection 2, the company indicated the correct overall rate increase should be 95.2% rather than 121.8%. It does not appear that SERFF has been updated. Please do so at your earliest convenience.

Thank you.

---

**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

## Reviewer Note

**Created By:**

Janet Houser on 12/03/2014 12:35 PM

**Last Edited By:**

Janet Houser

**Submitted On:**

12/03/2014 01:21 PM

**Subject:**

RRS

**Comments:**

Rate Summaries

Long Term Care Insurance Rate Request Summary  
Part 1 – To Be Completed By Company

Reset Form

Company Name and NAIC Number:

SERFF Tracking Number:

Effective Date:

Revised Rates

Average Annual Premium Per Member:

Average Requested Percentage Rate Change Per Member:

Minimum Requested Percentage Rate Change Per Member:

Maximum Requested Percentage Rate Change Per Member:

Number of Policy Holders Affected :

Plans Affected

(The Form Number and "Product Name")

Form#

"Product Name"(if applicable)

30105A-VA, with endorsement form 32100	
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Attach a brief narrative to summarize the key information used to develop the rates including the main drivers for new or revised rates.

This document is intended to help explain the rate filing and it is only a summary of the company's request. It is not intended to describe or include all factors or information considered in the review process. For more detailed information, please refer to the complete filing.

## **Explanation of Assumptions and Rate Increase**

Rates are being raised on all policies issued under these policy forms to offset anticipated claims that are higher than previously expected. This is due in part to individuals living longer and keeping their policies longer, which has resulted in more claims being filed than we anticipated when this policy was originally priced. As a result, premiums need to be adjusted to ensure there is adequate funding to pay current and anticipated future claims. This premium increase is designed to offset some of these anticipated increased costs and in no way reflects on the integrity of an individual's policy, nor is it based on an individual's claims history, age, health status, or any other personal factor.

As required, we have filed our request for this premium increase with the Virginia Bureau of Insurance and included the necessary actuarial data and other items requested by the Virginia Bureau of Insurance to support the increase.

**Long Term Care Insurance Rate Request Summary  
Part 2 –To Be Completed By Bureau of Insurance**

**Company Name and NAIC Number:** RiverSource Life Insurance Company - 65005

**SERFF Tracking Number:** AERS-129009910

**Disposition:** approved

**Approval Date:** 12/3/2014

**Revised Rates**

<b>Average Annual Premium Per Member:</b>	<b>\$1859</b>
<b>Average Requested Percentage Rate Change Per Member:</b>	<b>10%</b>
<b>Minimum Requested Percentage Rate Change Per Member:</b>	<b>10%</b>
<b>Maximum Requested Percentage Rate Change Per Member:</b>	<b>10%</b>
<b>Number of Policy Holders Affected:</b>	<b>1647</b>

Summary of the Bureau of Insurance's review of the rate request:

The Company submitted a rate increase request of 10%. Since all of the policies were issued prior to the effective date of the rate stabilization requirements (10/1/2003), we have reviewed this filing pursuant to the requirements of 14VAC5-200-150 and 14VAC5-130-70. This increase would apply to the 1,647 policies in force in Virginia as of the date the filing was received on 8/01/2013. The company provided its assumptions, historical experience and future projections of claims and premium both on a nationwide and Virginia-only basis. The projected lifetime loss ratio is 80.3% and the anticipated future loss ratio taking into account the policy reserves is 84.6%. These ratios both exceed the required minimum, which is the greater of the original pricing loss ratio of 66.4% and the statutory minimum of 60%. We have reviewed the data for consistency and reasonableness and where data was found inconsistent or unreasonable, clarification was requested. We have utilized generally accepted actuarial methodologies in arriving at our opinion and confirm this increase is in compliance with applicable Virginia laws and regulations.

The reason for the rate increase is that claims are anticipated to be higher than previously expected. This is due in part to individuals living longer and keeping their policies longer, which results in higher claims than originally anticipated. As a result, premiums need to be adjusted to ensure there is adequate funding to pay current and anticipated future claims.

The company indicated that if the Bureau approved the currently requested 10% rate increase, the company agreed not to seek any increase effective within three years of the approval date. The company did indicate it is likely the company will request additional rate increases after three years. The company has included in its policyholder notice options that will allow the policyholder to reduce or eliminate the rate increase.

***This document is intended to help explain the rate filing and it is only a summary of the company's request. It is not intended to describe or include all factors or information considered in the review process. For more detailed information, please refer to the complete filing.***

---

**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

## Reviewer Note

**Created By:**

Janet Houser on 12/01/2014 08:47 AM

**Last Edited By:**

Janet Houser

**Submitted On:**

01/28/2015 06:16 AM

**Subject:**

Rate Summary Part 1 correction

**Comments:**

12.1.14 Per confirmation with the company, the correct number of insureds affected should be 1647 rather than 1674.

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**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

## Reviewer Note

**Created By:**

Janet Houser on 06/30/2014 01:58 PM

**Last Edited By:**

Janet Houser

**Submitted On:**

12/03/2014 01:21 PM

**Subject:**

policyholder letters

**Comments:**

6.30.14 - consumer services approves

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**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

## Reviewer Note

**Created By:**

Janet Houser on 01/07/2014 07:13 AM

**Last Edited By:**

Janet Houser

**Submitted On:**

12/03/2014 01:21 PM

**Subject:**

rate summary part II

**Comments:**

completed by actuary

10.28.14 - revised summary

**Health Insurance Rate Request Summary  
Part 2 –To Be Completed By Bureau of Insurance**

**Company Name and NAIC Number: Riversource Life Insurance Company - 65005**

**SERFF Tracking Number: AERS-129009910**

**Disposition:** [Click here to enter text.](#)

**Effective Date:** [Click here to enter a date.](#)

**Approval:**

**New Rates**

**Average Annual Premium Per Member:** N/A

**Revised Rates**

**Average Annual Premium Per Member:** \$1,859

**Average Requested Percentage Rate Change Per Member:** 10%

**Minimum Requested Percentage Rate Change Per Member:** 10%

**Maximum Requested Percentage Rate Change Per Member:** 10%

+

Summary of the Bureau of Insurance's review of the rate request:

The Company submitted a rate increase request of 10%. Since all of the policies were issued prior to the effective date of the rate stabilization requirements (10/1/2003), we have reviewed this filing pursuant to the requirements of 14VAC5-200-150 and 14VAC5-130-70. This increase would apply to the 1,647 policies in force in Virginia as of 3/31/2013. The company provided its assumptions, historical experience and future projections of claims and premium both on a nationwide and Virginia-only basis. All of the projected loss ratios exceed the statutory minimums. We have reviewed the data for consistency and reasonableness and where data was found inconsistent or unreasonable, clarification was requested. We have utilized generally accepted actuarial methodologies in arriving at our opinion and confirm this increase is in compliance with applicable Virginia laws and regulations.

This document is intended to help explain the rate filing and it is only a summary of the company's request. It is not intended to describe or include all factors or information considered in the review process. For more detailed information, please refer to the complete filing.

**Health Insurance Rate Request Summary  
Part 2 –To Be Completed By Bureau of Insurance**

**Company Name and NAIC Number: Riversource Life Insurance Company - 65005**

**SERFF Tracking Number: AERS-129009910**

**Disposition:** [Click here to enter text.](#)

**Effective Date:** [Click here to enter a date.](#)

**Approval:**

**New Rates**

**Average Annual Premium Per Member:** N/A

**Revised Rates**

**Average Annual Premium Per Member:** \$1,859

**Average Requested Percentage Rate Change Per Member:** 10%

**Minimum Requested Percentage Rate Change Per Member:** 10%

**Maximum Requested Percentage Rate Change Per Member:** 10%

+

Summary of the Bureau of Insurance's review of the rate request:

The Company submitted a rate increase request of 10%. Since all of the policies were issued prior to the effective date of the rate stabilization requirements (10/1/2003), we have reviewed this filing pursuant to the requirements of 14VAC5-200-150 and 14VAC5-130-70. This increase would apply to the 1,647 policies in force in Virginia as of 3/31/2013. The company provided its assumptions, historical experience and future projections of claims and premium both on a nationwide and Virginia-only basis. The projected lifetime loss ratio is 80.3% and the anticipated future loss ratio taking into account the policy reserves is 84.6%. These ratios both exceed the required minimum, which is the greater of the original pricing loss ratio of 66.4% and the statutory minimum of 60%. We have reviewed the data for consistency and reasonableness and where data was found inconsistent or unreasonable, clarification was requested. We have utilized generally accepted actuarial methodologies in arriving at our opinion and confirm this increase is in compliance with applicable Virginia laws and regulations.

This document is intended to help explain the rate filing and it is only a summary of the company's request. It is not intended to describe or include all factors or information considered in the review process. For more detailed information, please refer to the complete filing.

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**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

## Reviewer Note

**Created By:**

Janet Houser on 01/07/2014 07:04 AM

**Last Edited By:**

Janet Houser

**Submitted On:**

12/03/2014 01:21 PM

**Subject:**

act review

**Comments:**

sent to Shawn Parks 12.27.13

approve 1.2.14

10.28.14 revised recommendation with NAIC compliance



SHAWN D. PARKS, FSA, MAAA  
1114 CATAWBA RIVER RD • GREAT FALLS, SC 29055  
(803) 994 - 9895 • SHAWN.PARKS@ARCGA.COM

January 2, 2014

Mr. Bob Grissom  
Supervisor, Forms and Rates Section  
Life and Health Division  
State Corporation Commission, Bureau of Insurance  
P. O. Box 1157  
Richmond, VA 23218

Subject: **Riversource Life Insurance Company**  
**SERFF Tracking # AERS-129009910**  
**Policy Form 30160A with endorsement 32100**

Dear Bob:

At your request, we have reviewed the filing for the above captioned submission from RiverSource Life Insurance Company (the "Company"). This is a filing to request a rate increase pursuant to the requirements of 14VAC5-200-150 for an individual long-term care insurance plan, written under Policy Form 30160A with Endorsement 32100. This block of business is not available for new issues.

### **Recommendation**

After review of the Company's submission, we believe that the Company has provided all of the information required by 14VAC5-130-70 and 14VAC5-200-150 and that the information provided sufficiently demonstrates that premiums are reasonable in relation to the benefits provided. We therefore recommend that the Virginia SCC Bureau of Insurance (the "Bureau") approve the proposed rates.

### **Historical Background**

The Company has submitted a 10% rate increase request based on its projection of future and lifetime loss ratios. The Company's rate increase history shows a pattern of requesting frequent smaller increases rather than the full amount theoretically justified by the loss ratio projections. They previously have raised rates by 10% in 2007 and by 10% in 2012. Implementation of the requested 10% increase would bring the cumulative rate increase percentage to 33.1%. The average cumulative nationwide rate increase as of 12/3/2013 is 26.9%.

## Analysis

The form with the endorsement was issued in Virginia from 7/2000 through 6/2003 and is not subject to the rate stabilization regulations. The filing includes all of the required elements of 14VAC5-200-150 and 14VAC5-130-70.

The minimum required loss ratio for this form is 60% as defined by 14VAC5-200-150. The Company has included both nationwide and Virginia-only loss ratio projections. In order to enhance credibility, the Company has used the nationwide experience under this form as the basis for its request, but we have reviewed both. We have reviewed and performed calculation checks on the exhibits provided by the Company and not found any issues with the exhibits.

A summary of all applicable projected loss ratios is shown below:

Lifetime LR base on original pricing	66.4%
Lifetime LR in the previous rate increase filing with current rates	79.2%
Lifetime LR currently projected w/o rate increase	82.8%
Lifetime LR currently projected w/ 10% rate increase	80.3%
Lifetime LR with requested premiums applicable from inception	68.4%
Anticipated Future LR w/ Active Life Reserves	84.6%

These results show that all projected loss ratios are greater than the applicable minimum loss ratio of 60% and the original pricing loss ratio of 66.4%. In addition, the 80.3% projected lifetime loss ratio including the rate increase exceeds the projected loss ratio at the time of the last rate increase.

The current assumptions are based on the Company's experience for this form. We analyzed the changes in assumptions since the 2011 filing and summarize those below:

- Mortality – a slight decrease in the mortality selection factors for all ages, which would produce higher anticipated loss ratios.
- Lapse – a comparison of the lapse rate assumptions shows generally slightly lower cumulative persistency in the current assumptions vs. those used in the 2011 filing, which would result in slightly lower loss ratios.
- Morbidity – the 2013 morbidity assumptions have increased significantly since the 2011 assumptions for both the oldest (over 72) and youngest (under 48) issue ages, producing higher loss ratio projections. The assumptions for the middle issue ages (48-72) have not changed significantly.

In total, the impact of all of these changes on the future expectations was unfavorable as evidenced by the increase in the expected loss ratio from 79.2% to 82.8%.

Table 1 in the Company's December 3, 2013 response shows that, compared to the original pricing assumptions, the largest driver of the worsening loss ratio is the change in lapse assumptions.

The only issue that we have about the information reviewed is related to the maximum rate increase allowable. Using a minimum loss ratio of 66.4% (the loss ratio based on

original pricing) and the data provided in Exhibit VIII, we calculate the maximum allowable rate increase to be 79.6%.

The Company has indicated in the cover letter that “unless emerging experience improves, we believe it likely that additional rate increases will be requested in the future.” This disclosure issue has been addressed by the Bureau in previous communications with the Company.

### **Reliance and Qualifications**

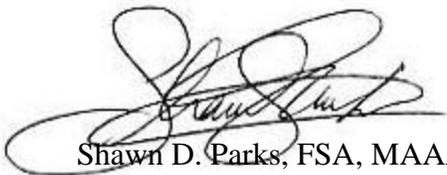
We are providing this letter to you to communicate our findings regarding the filing under consideration. Distribution of this letter to parties other than the Bureau by us or any other party does not constitute advice by us to those parties. The reliance of parties other than the Bureau on any aspect of our work is not authorized by us and is done at their own risk.

In arriving at our opinion, we used and relied on information provided by the Company and the Bureau without independent investigation or verification. If this information is inaccurate, incomplete, or out of date, our findings and conclusions may need to be revised. While we have relied on the data provided without independent investigation or verification, we have reviewed the data for consistency and reasonableness. Where we found the data inconsistent or unreasonable, we have requested clarification.

We have utilized generally accepted actuarial methodologies in arriving at our opinion. I am a member of the American Academy of Actuaries and meet that body’s Qualification Standards to render this opinion.

If you have any questions regarding this filing, please call me at 803-994-9895.

Sincerely,



Shawn D. Parks, FSA, MAAA



SHAWN D. PARKS, FSA, MAAA  
1114 CATAWBA RIVER RD • GREAT FALLS, SC 29055  
(803) 994 - 9895 • SHAWN.PARKS@ARCGA.COM

October 28, 2014

Mr. Bob Grissom  
Supervisor, Forms and Rates Section  
Life and Health Division  
State Corporation Commission, Bureau of Insurance  
P. O. Box 1157  
Richmond, VA 23218

Subject: **Riversource Life Insurance Company**  
**SERFF Tracking # AERS-129009910**  
**Policy Form 30160A with endorsement 32100**

Dear Bob:

At your request, we have continued our review of the filing for the above captioned submission from RiverSource Life Insurance Company (the "Company"). This is a filing to request a rate increase pursuant to the requirements of 14VAC5-200-150 for an individual long-term care insurance plan, written under Policy Form 30160A with Endorsement 32100. This block of business is not available for new issues. As requested, this review focuses primarily on the requirements of the Model Bulletin adopted by the NAIC Exec/Plenary on December 18, 2013 (the "Bulletin").

### **Recommendation**

After review of the Company's submission, we believe that the Company has complied with all aspects of the Bulletin and therefore recommend that the Virginia SCC Bureau of Insurance (the "Bureau") approve the proposed rates.

### **Historical Background**

The Company has submitted a 10% rate increase request based on its projection of future and lifetime loss ratios. The Company's rate increase history shows a pattern of requesting frequent smaller increases rather than the full amount theoretically justified by the loss ratio projections. They previously have raised rates by 10% in 2007 and by 10% in 2012. Implementation of the requested 10% increase would bring the cumulative rate increase percentage to 33.1%. The average cumulative nationwide rate increase as of 12/3/2013 is 26.9%.

## Analysis

Our analysis focuses on the six major aspects of the Model Bulletin as follows:

- Actuarial Assumptions for Establishing Rate Increase Requests
- Approval of Rate Increases
- Requirement to Administer Contingent Benefit Upon Lapse
- Policyholder Notification of Premium Increase
- Application of New Loss Ratio Standards
- Consideration of New Approaches

### Actuarial Assumptions for Establishing Rate Increase Requests

As discussed in our previous reports on this rate filing, the assumptions used by the Company in support of this rate increase appear to be reasonable based on the experience data provided by the Company. The assumptions and the present and accumulated values are also consistent with the three requirements spelled out in the Bulletin.

### Approval of Rate Increases

Two scenarios are laid out in the Bulletin: 1) a single rate increase with a three year moratorium on future rate increases, or 2) an actuarially equivalent series of increases. The Company has stated that, if the Bureau approves the currently requested 10% rate increase, they are willing to agree not to seek any increase effective within three years of the approval date of the currently requested increase.

### Requirement to Administer Contingent Benefit Upon Lapse

The Company has agreed to provide the contingent benefit upon lapse benefit for this pre-rate-stability block of policies.

### Policyholder Notification of Premium Increase

The four elements of this section of the Bulletin are addressed in the policyholder letter and FAQ.

### Application of New Loss Ratio Standards

As shown in Exhibit XII, the rate increase is compliant on both a nationwide and Virginia-only basis with the new dual loss-ratio approach for pre-rate-stability forms.

### Consideration of New Approaches

No new approaches are being requested at this time.

## Reliance and Qualifications

We are providing this letter to you to communicate our findings regarding the filing under consideration. Distribution of this letter to parties other than the Bureau by us or any other party does not constitute advice by us to those parties. The reliance of parties other than the Bureau on any aspect of our work is not authorized by us and is done at their own risk.

In arriving at our opinion, we used and relied on information provided by the Company and the Bureau without independent investigation or verification. If this information is inaccurate, incomplete, or out of date, our findings and conclusions may need to be revised. While we have relied on the data provided without independent investigation or verification, we have reviewed the data for consistency and reasonableness. Where we found the data inconsistent or unreasonable, we have requested clarification.

We have utilized generally accepted actuarial methodologies in arriving at our opinion. I am a member of the American Academy of Actuaries and meet that body's Qualification Standards to render this opinion.

If you have any questions regarding this filing, please call me at 803-994-9895.

Sincerely,

A handwritten signature in black ink, appearing to read "Shawn D. Parks", is written over a horizontal line.

Shawn D. Parks, FSA, MAAA

**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

## Post Submission Update Request Processed On 01/15/2014

Status: Allowed  
Created By: Cheryl Meyer  
Processed By: Janet Houser  
Comments:

### Company Rate Information:

Company Name:RiverSource Life Insurance Company

Field Name	Requested Change	Prior Value
Overall % Indicated Change	95.200%	121.800%

SERFF Tracking #:

AERS-129009910

State Tracking #:

AERS-129009910

Company Tracking #:

30160A.32100 2013

State:

Virginia

Filing Company:

RiverSource Life Insurance Company

TOI/Sub-TOI:

LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name:

Long Term Care

Project Name/Number:

30160A.32100 2013/30160A.32100 2013

### Rate Information

Rate data applies to filing.

Filing Method:

Review and Approve

Rate Change Type:

Increase

Overall Percentage of Last Rate Revision:

10.000%

Effective Date of Last Rate Revision:

03/01/2012

Filing Method of Last Filing:

Review and Approve

### 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):
RiverSource Life Insurance Company	95.200%	10.000%	\$278,400	1,647	\$2,784,003	10.000%	10.000%

**SERFF Tracking #:**

AERS-129009910

**State Tracking #:**

AERS-129009910

**Company Tracking #:**

30160A.32100 2013

**State:**

Virginia

**Filing Company:**

RiverSource Life Insurance Company

**TOI/Sub-TOI:**

LTC03I Individual Long Term Care/LTC03I.001 Qualified

**Product Name:**

Long Term Care

**Project Name/Number:**

30160A.32100 2013/30160A.32100 2013

## Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		VA ExhibitXIII Premiums 30160A 32100	30160A-VA, 32100	Revised	Previous State Filing Number: AERS-126909943 Percent Rate Change Request: 10	VA ExhXIV_Premiums_30 160A_32100_2014053 0.pdf,

EXHIBIT XIV

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

LIFETIME BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible			Deductible			Deductible			Deductible			Deductible			Deductible		
	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days
	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage
40	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
41	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
42	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
43	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
44	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
45	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
46	74.54	85.18	95.84	61.22	70.56	79.86	121.14	137.76	154.40	109.14	123.80	138.42	165.04	185.02	204.98	149.08	166.38	183.68
47	75.88	87.18	98.50	62.56	72.56	82.52	127.78	145.10	162.38	113.14	128.46	143.74	171.72	192.34	212.96	154.40	173.04	191.66
48	75.88	87.18	98.50	65.24	75.22	85.18	133.10	151.74	170.36	115.80	131.12	146.42	181.02	202.32	223.60	158.40	177.70	196.98
49	79.86	91.86	103.82	66.56	77.20	87.84	135.76	154.40	173.04	117.12	133.10	149.08	187.68	209.64	231.60	163.72	183.02	202.32
50	79.86	91.86	103.82	69.22	79.86	90.50	139.76	159.06	178.36	119.80	135.76	151.74	201.00	224.30	247.56	167.70	187.68	207.64
51	82.52	95.84	109.14	70.56	81.86	93.18	143.74	163.72	183.68	126.46	143.08	159.72	206.32	229.62	252.90	171.72	192.34	212.96
52	85.18	98.50	111.80	70.56	81.86	93.18	146.42	166.38	186.34	126.46	143.08	159.72	212.96	236.92	260.88	179.70	200.34	220.94
53	86.52	100.50	114.46	77.20	89.18	101.16	150.42	171.06	191.66	130.44	147.76	165.04	219.62	244.24	268.86	183.68	204.98	226.28
54	86.52	100.50	114.46	77.20	89.18	101.16	157.06	178.36	199.66	133.10	150.42	167.70	228.94	254.24	279.52	187.68	209.64	231.60
55	90.50	105.16	119.80	82.52	95.84	109.14	161.06	183.02	204.98	138.42	157.06	175.70	238.26	264.22	290.16	195.66	218.96	242.24
56	97.18	112.48	127.78	85.18	98.50	111.80	171.72	195.00	218.28	147.76	167.04	186.34	252.90	279.52	306.14	210.30	234.26	258.22
57	106.48	122.46	138.42	91.86	105.82	119.80	183.68	207.64	231.60	159.72	179.70	199.66	264.88	292.16	319.44	224.96	249.56	274.18
58	113.14	129.78	146.42	98.50	113.14	127.78	193.00	217.62	242.24	169.04	189.68	210.30	280.86	309.48	338.08	236.92	262.22	287.50
59	119.80	137.10	154.40	105.16	120.48	135.76	207.64	232.94	258.22	181.02	202.32	223.60	295.48	324.76	354.04	251.58	277.54	303.46
60	130.44	149.08	167.70	111.80	127.78	143.74	216.96	242.92	268.86	195.66	218.96	242.24	307.48	337.42	367.36	263.54	290.16	316.78
61	137.10	156.40	175.70	117.12	133.10	149.08	228.94	255.56	282.18	207.64	231.60	255.56	322.10	352.72	383.32	278.20	305.48	332.76
62	143.74	163.72	183.68	121.14	137.76	154.40	240.92	268.20	295.48	216.96	241.58	266.20	334.10	365.38	396.64	294.16	322.78	351.38
63	150.42	171.06	191.66	130.44	147.76	165.04	254.24	282.86	311.46	228.94	254.24	279.52	348.72	380.66	412.62	306.14	335.42	364.70
64	159.72	181.02	202.32	138.42	157.06	175.70	263.54	292.82	322.10	238.26	264.22	290.16	363.38	395.98	428.58	320.78	350.72	380.66
65	169.04	192.34	215.62	145.10	164.38	183.68	279.52	310.14	340.74	254.24	281.52	308.80	379.34	413.30	447.22	334.10	365.38	396.64
66	198.34	222.94	247.56	169.04	189.68	210.30	323.44	356.04	388.66	290.16	319.44	348.72	431.24	467.20	503.12	376.68	410.64	444.56
67	231.60	258.22	284.84	201.00	224.30	247.56	368.70	403.96	439.24	328.76	360.06	391.32	484.48	523.10	561.68	417.94	453.88	489.80
68	263.54	292.82	322.10	226.28	251.58	276.84	412.62	449.88	487.14	368.70	402.64	436.56	533.74	574.34	614.92	460.52	499.14	537.72
69	299.48	330.78	362.04	254.24	281.52	308.80	455.20	495.14	535.06	409.94	445.90	481.82	590.96	634.90	678.82	501.80	542.38	582.98
70	331.44	365.38	399.30	280.86	310.80	340.74	500.46	543.04	585.64	447.22	485.82	524.42	642.88	688.80	734.72	540.38	582.98	625.58
71	360.72	395.98	431.24	307.48	338.76	370.02	545.72	590.96	636.22	484.48	524.42	564.34	692.12	740.04	787.96	582.98	628.24	673.48
72	396.64	433.90	471.18	334.10	368.04	401.96	589.64	636.90	684.14	525.76	567.68	609.60	749.36	800.60	851.84	624.26	671.50	718.74
73	428.58	468.52	508.44	362.04	397.98	433.90	634.90	684.82	734.72	563.02	607.62	652.20	799.94	853.84	907.74	666.84	716.76	766.66
74	459.20	501.14	543.04	388.66	427.26	465.86	678.82	730.74	782.62	601.62	648.20	694.78	851.84	907.74	963.64	708.10	760.02	811.92
75	496.48	541.06	585.64	419.28	459.86	500.46	728.06	783.32	838.54	644.20	693.46	742.70	909.08	968.30	999.98	754.68	809.94	865.16
76	536.40	586.32	636.22	453.88	499.80	545.72	782.62	843.86	905.08	693.46	748.70	803.92	968.96	999.98	999.98	803.92	865.16	926.38
77	579.00	634.24	689.46	488.48	539.72	590.96	839.88	907.08	974.30	740.04	801.26	862.48	999.98	999.98	999.98	855.84	923.06	990.26
78	618.92	679.50	740.04	523.10	579.66	636.22	894.44	967.64	999.98	789.30	856.50	923.72	999.98	999.98	999.98	907.74	980.96	999.98
79	661.52	727.40	793.28	557.70	619.58	681.48	951.68	999.98	999.98	841.20	915.72	990.26	999.98	999.98	999.98	960.98	999.98	999.98

EXHIBIT XIV

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

6 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible			Deductible			Deductible			Deductible			Deductible			Deductible		
	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days
	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage
	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%
40	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
41	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
42	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
43	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
44	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
45	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
46	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	109.14	122.46	135.76
47	62.56	72.56	82.52	53.24	61.22	69.22	93.18	106.48	119.80	77.20	87.84	98.50	131.78	148.42	165.04	113.14	127.12	141.08
48	62.56	72.56	82.52	54.58	63.22	71.88	97.18	111.14	125.12	81.20	92.52	103.82	134.44	151.08	167.70	115.80	129.78	143.74
49	63.88	74.54	85.18	54.58	63.22	71.88	102.50	116.46	130.44	83.86	95.18	106.48	138.42	155.74	173.04	122.46	137.10	151.74
50	66.56	77.20	87.84	58.56	67.90	77.20	106.48	121.14	135.76	87.84	99.84	111.80	141.08	158.40	175.70	129.12	144.44	159.72
51	67.90	79.20	90.50	58.56	67.90	77.20	110.48	125.80	141.08	87.84	99.84	111.80	146.42	165.04	183.68	131.78	147.10	162.38
52	67.90	79.20	90.50	58.56	67.90	77.20	113.14	128.46	143.74	90.50	102.50	114.46	151.74	170.36	189.00	135.76	151.74	167.70
53	69.22	81.20	93.18	59.90	69.90	79.86	117.12	133.10	149.08	95.84	109.14	122.46	155.74	175.04	194.32	138.42	154.40	170.36
54	69.22	81.20	93.18	59.90	69.90	79.86	121.14	137.76	154.40	101.16	114.46	127.78	158.40	177.70	196.98	142.42	159.06	175.70
55	74.54	87.84	101.16	63.88	74.54	85.18	127.78	145.10	162.38	105.16	119.14	133.10	162.38	182.36	202.32	151.74	169.04	186.34
56	79.86	93.18	106.48	66.56	77.20	87.84	135.76	154.40	173.04	111.80	126.46	141.08	171.72	192.34	212.96	159.72	178.36	196.98
57	86.52	100.50	114.46	70.56	81.86	93.18	142.42	161.72	181.02	118.48	133.78	149.08	183.68	204.98	226.28	169.04	188.34	207.64
58	93.18	107.82	122.46	77.20	89.18	101.16	154.40	174.38	194.32	130.44	146.42	162.38	198.34	220.28	242.24	181.02	201.00	220.94
59	97.18	112.48	127.78	85.18	98.50	111.80	161.06	181.70	202.32	137.10	153.74	170.36	208.98	232.28	255.56	190.34	210.98	231.60
60	106.48	122.46	138.42	89.18	103.16	117.12	170.36	191.66	212.96	149.08	166.38	183.68	223.60	247.56	271.52	202.32	223.60	244.90
61	111.80	127.78	143.74	91.86	105.82	119.80	179.70	201.66	223.60	157.06	175.70	194.32	232.94	257.56	282.18	211.64	233.60	255.56
62	115.80	132.44	149.08	98.50	113.14	127.78	187.68	210.98	234.26	163.72	183.02	202.32	242.24	267.54	292.82	224.96	248.24	271.52
63	122.46	139.76	157.06	105.16	120.48	135.76	196.98	220.94	244.90	175.70	195.66	215.62	256.90	282.86	308.80	234.26	258.22	282.18
64	133.10	151.74	170.36	109.14	125.12	141.08	206.32	230.94	255.56	182.36	203.00	223.60	268.86	295.48	322.10	246.24	270.86	295.48
65	139.76	159.06	178.36	115.80	132.44	149.08	216.96	242.92	268.86	193.00	214.96	236.92	283.52	312.14	340.74	255.56	280.86	306.14
66	161.06	181.70	202.32	135.76	154.40	173.04	246.24	274.86	303.46	223.60	247.56	271.52	322.10	352.72	383.32	283.52	310.80	338.08
67	185.02	208.32	231.60	157.06	177.04	196.98	279.52	310.14	340.74	254.24	280.20	306.14	360.72	394.66	428.58	314.12	344.74	375.34
68	206.32	230.94	255.56	173.04	194.32	215.62	310.14	342.74	375.34	283.52	312.14	340.74	399.30	435.24	471.18	347.40	380.00	412.62
69	228.94	255.56	282.18	196.98	220.94	244.90	339.42	374.68	409.94	312.80	342.74	372.68	440.58	479.84	519.10	378.00	413.96	449.88
70	250.22	279.52	308.80	218.28	243.58	268.86	372.68	409.94	447.22	343.40	375.34	407.28	476.50	517.78	559.02	411.30	450.56	489.80
71	271.52	302.14	332.76	236.92	263.54	290.16	404.62	444.56	484.48	375.34	409.94	444.56	517.78	562.36	606.94	441.90	483.16	524.42
72	294.16	326.76	359.38	260.88	290.16	319.44	432.58	474.52	516.42	401.96	437.92	473.84	556.36	602.96	649.52	472.52	517.12	561.68
73	316.78	351.38	386.00	279.52	310.14	340.74	464.54	509.12	553.70	436.56	475.18	513.76	594.96	644.88	694.78	503.12	549.72	596.28
74	339.42	376.02	412.62	300.80	332.76	364.70	497.80	544.40	590.96	464.54	505.12	545.72	633.56	685.48	737.38	533.74	583.66	633.56
75	366.04	405.30	444.56	322.10	356.70	391.32	531.08	581.00	630.90	495.14	537.72	580.32	677.50	732.74	787.96	568.34	620.92	673.48
76	411.30	453.22	495.14	367.36	404.62	441.90	592.30	646.20	700.10	556.36	602.96	649.52	740.04	799.94	859.82	630.90	688.14	745.36
77	457.86	503.12	548.38	413.96	454.54	495.14	652.20	709.44	766.66	617.58	668.16	718.74	805.26	869.82	934.36	696.12	758.02	819.90
78	503.12	551.04	598.96	460.52	504.46	548.38	717.42	779.30	841.20	682.82	738.06	793.28	870.48	939.68	999.98	761.34	827.88	894.44
79	553.70	605.62	657.52	509.78	557.04	604.28	781.30	847.20	913.06	746.70	805.92	865.16	934.36	999.98	999.98	823.90	895.12	966.30

EXHIBIT XIV

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

4 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible						Deductible						Deductible					
	20 days			90 days			20 days			90 days			20 days			90 days		
	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage
	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%
40	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
41	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
42	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
43	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
44	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
45	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
46	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
47	50.58	58.56	66.56	35.94	41.94	47.92	77.20	87.84	98.50	61.22	70.56	79.86	119.80	133.10	146.42	101.16	111.80	122.46
48	51.92	60.56	69.22	37.26	43.94	50.58	78.54	89.84	101.16	63.88	73.22	82.52	121.14	135.10	149.08	105.16	116.46	127.78
49	54.58	63.22	71.88	39.94	46.60	53.24	81.20	92.52	103.82	65.24	75.22	85.18	123.80	137.76	151.74	105.16	116.46	127.78
50	55.90	65.24	74.54	42.60	50.58	58.56	85.18	97.18	109.14	67.90	77.88	87.84	127.78	142.42	157.06	109.14	121.14	133.10
51	55.90	65.24	74.54	42.60	50.58	58.56	85.18	97.18	109.14	67.90	77.88	87.84	127.78	142.42	157.06	109.14	121.14	133.10
52	58.56	67.90	77.20	47.92	55.90	63.88	87.84	99.84	111.80	69.22	79.86	90.50	130.44	145.10	159.72	109.14	121.14	133.10
53	59.90	69.90	79.86	49.26	57.90	66.56	90.50	103.82	117.12	74.54	85.18	95.84	131.78	147.10	162.38	114.46	127.78	141.08
54	59.90	69.90	79.86	49.26	57.90	66.56	93.18	106.48	119.80	74.54	85.18	95.84	134.44	149.76	165.04	114.46	127.78	141.08
55	63.88	74.54	85.18	53.24	62.56	71.88	97.18	111.14	125.12	78.54	89.84	101.16	138.42	154.40	170.36	121.14	135.10	149.08
56	66.56	77.20	87.84	55.90	65.24	74.54	106.48	121.14	135.76	85.18	97.18	109.14	147.76	164.38	181.02	127.78	142.42	157.06
57	70.56	81.86	93.18	59.90	69.90	79.86	113.14	128.46	143.74	93.18	106.48	119.80	154.40	171.72	189.00	134.44	149.76	165.04
58	77.20	89.18	101.16	63.88	74.54	85.18	119.80	135.76	151.74	102.50	116.46	130.44	166.38	185.68	204.98	141.08	157.06	173.04
59	85.18	98.50	111.80	67.90	79.20	90.50	129.12	145.76	162.38	109.14	123.80	138.42	175.70	195.66	215.62	154.40	171.72	189.00
60	89.18	103.16	117.12	77.20	89.18	101.16	138.42	157.06	175.70	119.80	135.76	151.74	186.34	207.64	228.94	162.38	181.02	199.66
61	93.18	107.82	122.46	79.86	91.86	103.82	145.10	164.38	183.68	129.12	145.76	162.38	193.00	214.96	236.92	169.04	188.34	207.64
62	99.84	115.14	130.44	85.18	98.50	111.80	154.40	174.38	194.32	135.76	153.08	170.36	203.66	226.96	250.22	182.36	203.00	223.60
63	106.48	122.46	138.42	89.18	103.16	117.12	161.06	181.70	202.32	143.74	162.38	181.02	214.30	238.92	263.54	189.00	210.30	231.60
64	110.48	127.12	143.74	93.18	107.82	122.46	167.70	189.00	210.30	153.08	172.38	191.66	220.94	246.24	271.52	198.34	220.28	242.24
65	117.12	134.44	151.74	99.84	115.14	130.44	182.36	205.66	228.94	163.72	184.36	204.98	234.26	260.88	287.50	210.30	234.26	258.22
66	137.10	156.40	175.70	115.80	132.44	149.08	206.32	230.94	255.56	185.02	206.98	228.94	263.54	292.82	322.10	235.60	261.56	287.50
67	157.06	178.36	199.66	135.76	154.40	173.04	231.60	258.22	284.84	211.64	236.26	260.88	294.16	325.44	356.70	264.88	293.50	322.10
68	174.38	197.68	220.94	154.40	174.38	194.32	260.88	290.16	319.44	235.60	261.56	287.50	328.76	362.72	396.64	292.82	323.44	354.04
69	194.32	219.62	244.90	167.70	189.00	210.30	286.18	317.46	348.72	259.56	288.18	316.78	360.72	397.32	433.90	326.10	360.06	393.98
70	214.30	241.58	268.86	189.00	212.96	236.92	315.46	349.40	383.32	284.84	315.46	346.06	392.66	431.92	471.18	354.04	390.00	425.92
71	234.26	263.54	292.82	207.64	232.94	258.22	340.74	376.68	412.62	308.80	340.74	372.68	423.26	464.54	505.78	380.66	419.28	457.86
72	251.58	282.86	314.12	220.94	247.56	274.18	367.36	405.96	444.56	332.76	367.36	401.96	456.54	501.14	545.72	409.94	451.22	492.48
73	270.20	302.80	335.42	240.92	269.54	298.14	395.32	435.90	476.50	356.70	392.66	428.58	487.14	533.74	580.32	439.24	483.16	527.08
74	291.50	326.76	362.04	259.56	289.50	319.44	423.26	465.86	508.44	383.32	421.94	460.52	521.76	571.02	620.24	467.20	513.10	559.02
75	314.12	351.38	388.66	279.52	311.46	343.40	452.54	497.80	543.04	408.62	449.22	489.80	553.70	605.62	657.52	500.46	549.72	598.96
76	358.06	398.64	439.24	320.78	356.04	391.32	500.46	549.72	598.96	456.54	501.14	545.72	602.96	659.52	716.08	549.72	603.62	657.52
77	399.30	443.24	487.14	364.70	403.30	441.90	549.72	602.30	654.86	505.78	553.70	601.62	652.20	713.42	774.64	597.64	655.54	713.42
78	444.56	491.16	537.72	409.94	451.22	492.48	601.62	658.86	716.08	557.70	610.28	662.84	704.12	770.00	835.86	649.52	712.10	774.64
79	489.80	540.38	590.96	455.20	500.46	545.72	652.20	713.42	774.64	608.28	664.84	721.40	753.34	823.90	894.44	698.78	766.00	833.20
80				500.46	548.38					660.18	721.40					750.68	822.56	
81				544.40	595.62					713.42	778.64					799.94	876.48	
82				592.30	647.54					765.34	835.20					851.84	933.04	
83				640.22	699.44					817.24	891.78					903.76	989.60	
84				684.14	746.70					867.82	946.36					955.66	999.98	

EXHIBIT XIV

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

2 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible			Deductible			Deductible			Deductible			Deductible			Deductible		
	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days
	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage
40	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
41	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
42	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
43	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
44	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
45	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
46	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
47	35.94	41.94	47.92	27.96	32.62	37.26	59.90	68.56	77.20	47.92	54.58	61.22	85.18	95.84	106.48	70.56	79.20	87.84
48	37.26	43.94	50.58	29.28	34.60	39.94	61.22	70.56	79.86	50.58	58.56	66.56	85.18	95.84	106.48	74.54	83.86	93.18
49	37.26	43.94	50.58	29.28	34.60	39.94	63.88	73.22	82.52	53.24	61.22	69.22	89.18	100.50	111.80	74.54	83.86	93.18
50	42.60	50.58	58.56	33.28	39.28	45.26	67.90	77.88	87.84	57.24	65.90	74.54	89.18	100.50	111.80	78.54	88.52	98.50
51	42.60	50.58	58.56	33.28	39.28	45.26	67.90	77.88	87.84	57.24	65.90	74.54	93.18	105.16	117.12	81.20	91.20	101.16
52	42.60	50.58	58.56	33.28	39.28	45.26	73.22	83.20	93.18	59.90	68.56	77.20	93.18	105.16	117.12	81.20	91.20	101.16
53	43.94	52.58	61.22	34.60	41.28	47.92	74.54	85.18	95.84	61.22	70.56	79.86	101.16	114.46	127.78	85.18	95.84	106.48
54	43.94	52.58	61.22	34.60	41.28	47.92	77.20	87.84	98.50	63.88	73.22	82.52	101.16	114.46	127.78	87.84	98.50	109.14
55	50.58	59.90	69.22	39.94	47.92	55.90	81.20	92.52	103.82	67.90	77.88	87.84	105.16	119.14	133.10	91.86	103.16	114.46
56	53.24	62.56	71.88	39.94	47.92	55.90	83.86	95.18	106.48	73.22	83.20	93.18	109.14	123.80	138.42	98.50	110.48	122.46
57	57.24	67.24	77.20	43.94	52.58	61.22	90.50	102.50	114.46	79.86	90.50	101.16	115.80	131.12	146.42	103.82	117.12	130.44
58	61.22	71.88	82.52	50.58	59.90	69.22	95.84	109.14	122.46	83.86	95.18	106.48	125.12	141.08	157.06	110.48	124.46	138.42
59	65.24	76.54	87.84	53.24	62.56	71.88	105.16	119.14	133.10	90.50	102.50	114.46	131.78	148.42	165.04	114.46	129.12	143.74
60	71.88	83.86	95.84	57.24	67.24	77.20	109.14	123.80	138.42	95.84	109.14	122.46	138.42	155.74	173.04	123.80	139.10	154.40
61	77.20	89.18	101.16	61.22	71.88	82.52	115.80	131.12	146.42	105.16	119.14	133.10	146.42	165.04	183.68	127.78	143.74	159.72
62	82.52	95.84	109.14	63.88	74.54	85.18	119.80	135.76	151.74	109.14	123.80	138.42	155.74	175.04	194.32	131.78	148.42	165.04
63	86.52	100.50	114.46	67.90	79.20	90.50	129.12	145.76	162.38	115.80	131.12	146.42	162.38	182.36	202.32	138.42	155.74	173.04
64	90.50	105.16	119.80	71.88	83.86	95.84	133.10	150.42	167.70	119.80	135.76	151.74	169.04	189.68	210.30	143.74	162.38	181.02
65	97.18	112.48	127.78	79.86	93.18	106.48	141.08	159.72	178.36	129.12	145.76	162.38	178.36	199.66	220.94	153.08	172.38	191.66
66	110.48	127.12	143.74	90.50	105.16	119.80	157.06	177.04	196.98	141.08	159.72	178.36	201.00	224.30	247.56	166.38	187.02	207.64
67	122.46	141.08	159.72	101.16	117.12	133.10	170.36	191.66	212.96	154.40	174.38	194.32	219.62	244.24	268.86	182.36	204.32	226.28
68	138.42	158.40	178.36	114.46	131.78	149.08	189.00	212.96	236.92	165.04	186.34	207.64	242.24	268.86	295.48	198.34	222.94	247.56
69	149.08	170.36	191.66	126.46	145.76	165.04	204.98	230.28	255.56	177.04	200.34	223.60	264.88	293.50	322.10	214.30	240.26	266.20
70	167.70	191.66	215.62	139.76	160.40	181.02	222.28	249.56	276.84	190.34	214.96	239.58	287.50	318.12	348.72	232.94	261.56	290.16
71	178.36	203.66	228.94	150.42	172.38	194.32	239.58	268.86	298.14	201.00	226.96	252.90	308.80	340.74	372.68	246.24	276.18	306.14
72	191.66	218.28	244.90	165.04	189.00	212.96	252.90	283.52	314.12	214.30	241.58	268.86	331.44	365.38	399.30	262.22	293.50	324.76
73	206.32	234.94	263.54	175.70	201.00	226.28	270.20	302.80	335.42	226.28	255.56	284.84	354.04	390.00	425.92	278.20	312.14	346.06
74	219.62	249.56	279.52	189.00	215.62	242.24	287.50	322.10	356.70	239.58	270.20	300.80	375.34	412.62	449.88	294.16	329.42	364.70
75	234.26	266.20	298.14	203.66	232.28	260.88	304.82	341.42	378.00	250.22	282.18	314.12	399.30	439.24	479.16	314.12	351.38	388.66
76	267.54	302.80	338.08	232.94	264.22	295.48	332.76	372.68	412.62	278.20	313.46	348.72	431.24	473.84	516.42	347.40	388.00	428.58
77	300.80	339.42	378.00	268.86	303.46	338.08	364.70	407.28	449.88	308.80	347.40	386.00	464.54	510.44	556.36	380.66	424.60	468.52
78	334.10	376.02	417.94	303.46	342.08	380.66	392.66	438.58	484.48	335.42	376.68	417.94	500.46	549.72	598.96	415.28	461.86	508.44
79	367.36	412.62	457.86	332.76	374.02	415.28	424.60	474.52	524.42	370.02	415.28	460.52	532.40	584.32	636.22	448.56	498.48	548.38
80				370.02	415.28					396.64	444.56					480.50	533.08	
81				401.96	449.88					427.26	478.50					516.42	572.34	
82				436.56	488.48					459.20	514.44					549.72	608.94	
83				473.84	529.74					491.16	550.38					584.32	646.20	
84				508.44	568.34					524.42	586.98					617.58	682.82	

**State:** Virginia **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

## Supporting Document Schedules

<b>Satisfied - Item:</b>	Certification of Compliance
<b>Comments:</b>	Please see actuarial memorandum.
<b>Attachment(s):</b>	
<b>Item Status:</b>	Received & Acknowledged
<b>Status Date:</b>	02/25/2014
<b>Satisfied - Item:</b>	L&H Actuarial Memorandum
<b>Comments:</b>	
<b>Attachment(s):</b>	VA Revised_ActMem_30160A_32100_20140530.pdf
<b>Item Status:</b>	Received & Acknowledged
<b>Status Date:</b>	12/03/2014
<b>Satisfied - Item:</b>	Cover Lettera and Third Party Document
<b>Comments:</b>	
<b>Attachment(s):</b>	VA CovLtr_30160A_32100_20130801.pdf Milliman_Involvement_VA_30160A_32100_20130801.pdf
<b>Item Status:</b>	Received & Acknowledged
<b>Status Date:</b>	01/14/2014
<b>Satisfied - Item:</b>	Rate Revision Check List
<b>Comments:</b>	
<b>Attachment(s):</b>	VA Rate_Revision_Checklist_30160A_32100_20130801.pdf
<b>Item Status:</b>	Received & Acknowledged
<b>Status Date:</b>	01/14/2014
<b>Satisfied - Item:</b>	Response 12-3-13
<b>Comments:</b>	
<b>Attachment(s):</b>	VA Response_30160A_32100_20131203.pdf VA Response_Attachments_30160A_32100_20131203.xlsx
<b>Item Status:</b>	Received & Acknowledged
<b>Status Date:</b>	01/14/2014
<b>Satisfied - Item:</b>	Response 2-19-14
<b>Comments:</b>	

**SERFF Tracking #:**

AERS-129009910

**State Tracking #:**

AERS-129009910

**Company Tracking #:**

30160A.32100 2013

**State:**

Virginia

**Filing Company:**

RiverSource Life Insurance Company

**TOI/Sub-TOI:**

LTC03I Individual Long Term Care/LTC03I.001 Qualified

**Product Name:**

Long Term Care

**Project Name/Number:**

30160A.32100 2013/30160A.32100 2013

<b>Attachment(s):</b>	VA Response_30160A_32100_20140219.pdf LTC Rate Increase Policyholder Q&A.pdf Sample LTC Policyholder Notification Letter - On Waiver.pdf Sample LTC Policyholder Notification Letter - Not On Waiver.pdf VA Rate Request Summary_30160A_32100_20140219.pdf
<b>Item Status:</b>	Received & Acknowledged
<b>Status Date:</b>	12/03/2014
<b>Satisfied - Item:</b>	Response 3-4-14
<b>Comments:</b>	
<b>Attachment(s):</b>	VA Response_30160A_32100_20140304.pdf
<b>Item Status:</b>	Received & Acknowledged
<b>Status Date:</b>	12/03/2014
<b>Satisfied - Item:</b>	Response 5-30-14
<b>Comments:</b>	
<b>Attachment(s):</b>	VA Response_30160A_32100_20140530.pdf VA Rate Request Summary_30160A_32100_20140530.pdf Revised Sample LTC Policyholder Notification Letter - On Waiver.pdf Revised Sample LTC Policyholder Notification Letter - Not On Waiver.pdf LTC Rate Increase Policyholder Q&A.pdf
<b>Item Status:</b>	Received & Acknowledged
<b>Status Date:</b>	12/03/2014

**State:** Virginia      **Filing Company:** RiverSource Life Insurance Company  
**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified  
**Product Name:** Long Term Care  
**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

***Attachment VA Response\_Attachments\_30160A\_32100\_20131203.xlsx is not a PDF document and cannot be reproduced here.***

**RIVERSOURCE LIFE INSURANCE COMPANY**

**Address: 227 Ameriprise Financial Center, Minneapolis MN 55474**

**Actuarial Memorandum for 30160A, Subject to Endorsement Form 32100**

**May 2014**

Policy form 30160A-VA, subject to endorsement form 32100, is an individual policy form providing benefits to individuals for confinement in a nursing home with home care services. This form was issued in Virginia from July 15, 2000 to June 15, 2003.

**1. Purpose of Filing**

This actuarial memorandum has been prepared for the purpose of demonstrating that the anticipated loss ratio standard of this product meets the minimum requirements of your state and may not be suitable for other purposes.

**2. Description of Benefits**

This is a federally tax qualified, individually underwritten policy form that provides comprehensive long term care coverage. Benefits are payable for nursing home and assisted living facility (ALF) care, home and community care, adult day care, respite care, caregiver training, and case management services. Equipment purchase benefits are also included with a lifetime maximum of 50 times the home and community care daily maximum benefit amount. Benefits may be payable for other supplies and services if they are specified in an alternate plan of care agreed to by the insured, the insured's physician and RiverSource Life Insurance Company ("RiverSource Life").

This policy reimburses expenses incurred by the insured subject to the amount of coverage purchased. The facility care daily maximum benefit (FCDMB) is elected by the proposed insured at the time of application. This facility care daily maximum benefit amount is applied to nursing home, ALF, bed reservation, respite care, and alternative plan of care benefits. The home and community care daily maximum benefit amount is also elected by the proposed insured at the time of application and is a percentage (50%, 75%, or 100%) of the facility care daily maximum benefit amount. The home and community care daily maximum benefit amount is applied to home care and adult day care.

A lifetime maximum benefit amount is also elected at the time of application. This establishes the maximum amount that will be paid under the policy for the combined total of all benefit payments. The choices are 730 x FCDMB, 1,460 x FCDMB, 2,190 x FCDMB, and unlimited.

***INFLATION PROTECTION***

At the time of application the proposed insured can elect no benefit increase, the simple benefit increase option, or the compound benefit increase option. The simple benefit increase option will increase the daily maximum amounts (both facility and home and community care amounts) by 5% of the original daily maximum amount each year starting with the second policy year and continuing for the life of the policy, while the compound benefit increase option will increase the previous year's daily maximum amounts (both the facility and home and community care amounts) by 5% each year starting with the second policy year and continuing for the life of the policy. The increasing benefits apply even when the policy is in claim status. Also, the remaining lifetime maximum benefit amount, before the increase, will increase each policy year by the same percentage that the facility care daily maximum benefit amount increases.

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When the total amount paid under a policy is equal to the current lifetime maximum benefit amount, the policy is terminated.

***DEDUCTIBLE PERIOD***

Benefit payments commence after a deductible period of 20 or 90 days of service, depending on the plan initially chosen. Satisfaction of the deductible period begins with the first day on which benefit eligibility is established and expenses are incurred for which payment would be made if there were no deductible period. Only days in which services are used are credited toward satisfaction of the deductible period. These days do not need to be consecutive, but they must occur within a continuous period of three times the number of days in the deductible period. Only one deductible period needs to be satisfied during the lifetime of the policy.

The deductible period applies to all policy benefits except caregiver training, case management, equipment purchase, and respite care. Days for which the only expenses incurred are expenses that are not subject to the deductible period will not be used to satisfy the deductible period.

***BENEFIT ELIGIBILITY AND CONDITIONS***

A licensed health care practitioner must certify the following eligibility conditions at least annually. Benefit eligibility is based on the following: (a) the insured being unable to perform at least 2 or more of the following 6 activities of daily living (ADLs): (1) eating, (2) toileting, (3) transferring, (4) dressing, (5) continence, and (6) bathing, without substantial assistance for a period of at least 90 days due to a loss of functional capacity, or (b) severe cognitive impairment requiring substantial supervision, or (c) the insured having a level of disability similar to that described in (a) above, based on standards established by the Secretary of the Treasury.

A Medicare non-duplication provision excludes benefits that otherwise would be paid but for the application of a Medicare deductible or coinsurance amount.

***FACILITY CARE BENEFITS***

Facility care benefits are payable for nursing home confinement, whether skilled, intermediate, or custodial levels of care are received. Hospital confinement is not a prerequisite for benefit entitlement. Once benefit eligibility is established and the deductible period is satisfied, expenses incurred as a resident inpatient in a nursing home will be reimbursed up to the facility care daily maximum benefit amount that applies on the day expenses are incurred.

Facility care benefits are also payable for stays in a qualified ALF. A qualified ALF is one that has a minimum of 8 inpatients and has a 24-hour awake, trained, and ready to respond staff. Once benefit eligibility is established and the deductible period is satisfied, expenses incurred as a resident inpatient in an ALF will be reimbursed up to the facility care daily maximum benefit amount that applies on the day expenses are incurred.

Premium payments will be waived during extended nursing home and ALF stays. This waiver begins after 90 days of confinement (including during the deductible period) in a nursing home or ALF. These days do not need to be consecutive, but they must occur

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within a continuous period of 180 days. The waiver stops once nursing home and ALF benefits cease.

If a temporary hospitalization is required during a period of confinement in a nursing home or ALF and there is a charge to reserve a bed in the facility, this policy will pay the facility care daily maximum benefit amount for up to 21 days per policy year. These days also count towards satisfying the deductible period.

*HOME CARE BENEFITS*

Home care benefits covered at 100% of the home and community care daily maximum benefit amount are services provided by a nurse, a licensed physical, occupational or speech therapist, a home health aide, a personal care attendant, and adult day care. Home care benefits covered at 80% of the home and community care daily maximum benefit amount are homemaker and chore services. These expenses will be reimbursed subject to the percent of the home and community care daily maximum benefit amount listed above on the day expenses are incurred.

Premium payments will be reimbursed on a month-to-month basis during extended periods of home and community care. This premium waiver begins after expenses for home and community care services, excluding homemaker and chore services, have been incurred for 90 days. The expenses may be incurred while the deductible period is being satisfied or policy benefits are being received. These days do not need to be consecutive, but they must occur within a continuous period of 270 days. The premiums will continue to be reimbursed for each month in which at least 12 days of home and community care services, excluding homemaker and chore services, are received.

*ADDITIONAL BENEFITS*

Benefits in this section do not count against either the facility or home and community care daily maximum benefit amounts. They are, however, deducted from the lifetime maximum benefit amount, except for certain case management services described below. These expenses are not subject to the deductible period and they may not be used to satisfy the deductible period.

Expenses incurred for the first 14 days of respite care received during a policy year will be reimbursed subject to the facility care daily maximum benefit amount that applies on the day expenses are incurred.

Pre-approved equipment purchase expenses will be reimbursed up to a lifetime maximum of 50 times the home and community care daily maximum benefit amount. This equipment must be expected to help the insured remain in their home for at least 90 days.

Caregiver training expenses will be reimbursed up to a lifetime maximum of 5 times the home and community care daily maximum benefit amount.

The initial assessment fee for case management services is reimbursable, but to the extent it exceeds 5 times the facility care daily maximum benefit amount, it will be deducted from the lifetime maximum benefit amount. Other fees charged for case

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management services are reimbursable, but to the extent they exceed 2 times the facility care daily maximum benefit amount per use, they are deducted from the lifetime maximum benefit amount.

*NONFORFEITURE BENEFIT RIDER*

At issue, the insured has the option to select a nonforfeiture benefit rider. The nonforfeiture benefit rider provides a reduced lifetime maximum benefit amount upon lapse. The facility and home and community care daily maximum benefit amounts will continue at the same level as of the date of lapse, regardless of whether a benefit increase option was selected by the insured at issue.

The nonforfeiture benefit will begin if the policy terminates due to nonpayment of premium after the policy and rider have been in force for at least 3 years. The reduced lifetime maximum benefit amount is determined as the sum of all premiums paid at the time of lapse, including the premiums for the nonforfeiture benefit rider. The reduced lifetime maximum benefit amount will not be less than 30 times the facility care daily maximum benefit amount at the time of lapse. However, in no case will the sum of the benefits paid during the premium paying period and the reduced lifetime maximum benefit amount exceed the lifetime maximum benefit amount at time of lapse.

The provisions for the benefit are at least as favorable as those prescribed by the 1996 NAIC Model Regulation.

**3. Renewability**

This policy form is guaranteed renewable for life.

**4. Applicability**

This filing is applicable to inforce policies issued with endorsement form 32100 only, as this policy form is no longer being sold in the market.

**5. Actuarial Assumptions**

Exhibit I provides a comparison of the original pricing assumptions and the current assumptions used in this filing for mortality, lapses, morbidity and interest.

Exhibits II, III, IV and V provide experience analysis summaries for morbidity, mortality and lapse in support of the current rate increase assumptions.

The following discussion describes the actuarial assumptions used in the current rate increase analysis and summarizes our experience analysis in support of these current rate increase assumptions as well as the company's management of this block of business. We believe the current assumptions are justified by the underlying experience and that the changed assumptions from original pricing (and the prior rate increase filings) are reasonable. The current assumptions do not include any provision for profit or contingencies.

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### Morbidity

Expected claim costs are the product of original pricing expected claim costs and an actual-to-expected adjustment factor.

Starting in 1989, RiverSource Life marketed nursing home policies with a zero day prior hospitalization requirement. Using the emerging experience on this business, statistics from the "1985 National Nursing Home Survey" published by the National Center for Health Statistics, and input provided from RiverSource Life's reinsurer, the expected frequencies and severities of claims were developed for nursing home benefits. Incidence rates by issue age and duration were developed to reflect the effects of underwriting on nursing home claims incidence. It was understood that the underwriting process would include an assessment of functional and cognitive abilities if considered appropriate.

Starting in 1990, RiverSource Life also marketed home health care benefit riders. At the time of original pricing, only limited insured experience was available for home and community care benefits. Therefore the expected claim costs for these benefits were derived from general population data with the assistance of RiverSource Life's reinsurer. Both the incidence rates and the length of home care usage for the first two years were determined through analysis of the "1982-1984 National Long Term Care Surveys", which polled elderly people who manifested impairments in ADLs. The home care incidence rates were modified by loading for cognitive impairment as a benefit trigger.

The data from the "1985 National Nursing Home Survey" was used to extrapolate the length of home care usage after the first two years. Additionally, experience data from continuing care retirement communities was used to verify the claim cost assumptions and to provide guidance in translating general population experience to anticipated insured population experience. Incidence rates by issue age and duration were developed to reflect the effects of underwriting on home care claims incidence.

Claim costs for the Benefit Increase Options were based on these claim costs with the benefit loaded to reflect the scheduled increases in benefits. The nonforfeiture benefit claim costs were determined by assumptions consistent with those used in establishing premium rates. The above described experience was also used to determine marital discounts.

It should be recognized that considerable judgment was made with respect to expected claim costs, especially for non-institutional benefits. After using all available data, total expected claim costs were developed that represented reasonable estimates of aggregate long term care experience under the applicable underwriting criteria.

Actual-to-expected adjustment factors have been developed from actual emerging experience through anniversaries ending December 2011 and are shown in the following tables:

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**Lifetime Benefit Actual-to-Expected Adjustment Factors**

Duration	Age at Issue						
	<53	53-57	58-62	63-67	68-72	73-77	78+
1	0.10	0.35	0.35	0.40	0.45	1.20	1.70
2	0.10	0.35	0.35	0.45	0.50	1.25	1.70
3	0.10	0.35	0.35	0.45	0.60	1.25	1.70
4	0.10	0.35	0.35	0.95	0.80	1.30	1.70
5	0.10	0.35	0.35	0.95	0.90	1.30	1.70
6	0.10	0.35	0.35	0.95	1.00	1.35	1.70
7	0.15	0.35	0.40	0.95	1.15	1.40	1.70
8	0.15	0.35	0.50	0.90	1.15	1.35	1.70
9	0.15	0.35	0.60	0.95	1.15	1.45	1.70
10	0.15	0.35	0.60	0.95	1.15	1.50	1.70
11	0.15	0.35	0.65	0.95	1.15	1.50	1.70
12	0.25	0.40	0.65	0.95	1.15	1.50	1.70
13	0.30	0.45	0.70	1.00	1.15	1.50	1.70
14	0.30	0.50	0.75	1.00	1.15	1.50	1.70
15	0.30	0.50	0.75	1.00	1.15	1.50	1.70
16	0.30	0.55	0.75	1.00	1.15	1.50	1.70
17	0.35	0.60	0.80	1.05	1.15	1.50	1.70
18	0.35	0.65	0.80	1.05	1.15	1.50	1.70
19	0.35	0.70	0.80	1.05	1.15	1.60	1.70
20	0.45	0.75	0.85	1.05	1.15	1.60	1.70
21	0.50	0.80	0.85	1.05	1.15	1.60	1.80
22	0.55	0.85	0.85	1.05	1.15	1.70	1.80
23	0.60	0.85	0.90	1.05	1.15	1.70	1.80
24	0.65	0.85	0.90	1.05	1.15	1.70	1.90
25	0.70	0.85	0.90	1.05	1.15	2.00	1.90
26	0.75	0.85	0.95	1.05	1.15	2.00	1.90
27	0.80	0.85	0.95	1.05	1.15	2.10	2.00
28	0.80	0.85	1.00	1.05	1.15	2.10	2.00
29	0.90	0.90	1.00	1.05	1.15	2.10	2.00
30	0.90	0.95	1.05	1.05	1.15	2.10	2.00
31	0.90	0.98	1.08	1.05	1.15	2.10	2.03
32	0.94	0.98	1.08	1.05	1.15	2.10	2.03
33	0.94	0.98	1.08	1.05	1.15	2.10	2.03
34	1.00	0.98	1.08	1.05	1.15	2.10	2.03
35+	1.00	1.00	1.10	1.05	1.15	2.10	2.05

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**Non-Lifetime Benefit Actual-to-Expected Adjustment Factors**

Duration	Age at Issue								
	<48	48-52	53-57	58-62	63-67	68-72	73-77	78-82	83+
1	0.10	0.10	0.10	0.20	0.20	0.45	0.65	0.70	1.50
2	0.10	0.10	0.10	0.25	0.30	0.45	0.85	0.90	1.60
3	0.15	0.15	0.15	0.30	0.35	0.55	1.05	0.90	1.70
4	0.20	0.20	0.20	0.40	0.35	0.80	1.15	1.10	2.15
5	0.25	0.25	0.25	0.45	0.45	0.80	1.40	1.40	2.15
6	0.30	0.30	0.35	0.50	0.60	1.00	1.40	1.85	2.15
7	0.30	0.30	0.40	0.55	0.75	1.05	1.45	2.05	2.15
8	0.30	0.30	0.45	0.60	0.85	1.15	1.55	2.30	2.15
9	0.35	0.35	0.55	0.75	0.95	1.20	1.70	2.60	2.20
10	0.40	0.40	0.55	0.80	1.00	1.25	1.70	2.60	2.20
11	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
12	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
13	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
14	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
15	0.45	0.45	0.55	0.95	1.05	1.25	1.75	2.65	2.20
16	0.45	0.45	0.55	0.95	1.05	1.25	1.75	2.65	2.20
17	0.50	0.50	0.60	0.95	1.05	1.25	1.75	2.65	2.20
18	0.50	0.50	0.65	0.95	1.05	1.25	1.75	2.65	2.20
19	0.55	0.55	0.70	0.95	1.05	1.25	1.80	2.65	2.20
20	0.55	0.55	0.80	0.95	1.05	1.25	1.80	2.65	2.20
21	0.60	0.60	0.80	0.95	1.05	1.25	1.80	2.70	2.20
22	0.60	0.60	0.85	0.95	1.05	1.25	1.80	2.70	2.20
23	0.65	0.65	0.85	1.00	1.05	1.25	1.80	2.70	2.20
24	0.65	0.65	0.90	1.00	1.05	1.25	1.90	2.70	2.20
25	0.70	0.70	0.90	1.00	1.05	1.25	1.90	2.70	2.20
26	0.75	0.75	0.95	1.00	1.05	1.25	1.90	2.70	2.20
27	0.80	0.80	0.95	1.00	1.05	1.25	1.90	2.70	2.20
28	0.85	0.85	1.00	1.00	1.05	1.25	1.90	2.70	2.20
29	0.90	0.90	1.00	1.05	1.05	1.25	2.00	2.70	2.20
30	0.90	0.90	1.00	1.05	1.05	1.25	2.00	2.70	2.20
31	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
32	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
33	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
34	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
35+	1.00	1.00	1.00	1.05	1.10	1.25	2.00	2.70	2.20

Beginning in 2003, we have taken steps to improve claim experience by reviewing and tightening claim adjudication and care coordination practices where possible. To reflect these improvements, we have reduced our expected claim costs by 5% for 2004 and later.

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We conduct a morbidity study every year to analyze the current actual-to-expected adjustment factors (A/E factors). Our analysis is done on a claim cost basis, rather than on a frequency and severity basis, which is not readily available.

The morbidity study is performed by comparing actual incurred claims to expected incurred claims, where expected claims reflect the original pricing claim costs adjusted with the company's most recent set of A/E factors. If the resulting cumulative actual-to-expected ratio is near 100% while minimizing the squared error, no changes are made to the A/E factors. However, if the actual-to-expected ratio has shifted away from 100% or the squared error is too high, we develop a new set of A/E factors and retest them until a good fit is found (measured by actual-to-expected ratio and squared error).

Exhibit II displays "expected" experience using our current adjustment factors compared to actual incurred claims. The expected basis shown in this exhibit reflects the currently assumed claim costs. As shown in Exhibit II the total actual-to-expected ratio using the A/E factors described above is 101.1%. This experience is based on 1,206 actual claims (378 lifetime and 838 non-lifetime). Actual claim counts split by issue age band are also displayed in Exhibit II.

Professional judgment was applied to create factors for periods beyond that for which there is experience. It has been credibly observed on older forms, including 30160A subject to endorsement form 32100, that experience has been favorable at younger attained ages but much worse than priced for at older attained ages. Thus we believe A/E factors that increase by duration are appropriate.

Mortality

Durational mortality selection factors were developed from actual experience on all LTC forms combined and are applied to the 1983 Individual Annuitant Mortality (IAM) Basic table.

Exhibit III is based on deaths on all LTC policies incurred from policy anniversaries in 2000 through policy anniversaries in 2011. The expected basis shown in this exhibit reflects 1983 IAM Basic mortality with the currently assumed selection factors. The selection factors fit the observed data very well with the resulting A/E at or near 100%.

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The data, along with the following rules, were used in the development of the current selection factors:

- a. Factors must be non-decreasing by duration;
- b. Round to nearest 5%; and
- c. Maximum of 100%.

Selection factors are assumed to differ by issue age band, since the selection period is expected to be shorter at older issue ages.

At the older issue ages, mortality increases to approximately 100% of the table. In general, that has not been the case through duration 22 for younger issue ages, but we expect that it would as insureds reach a very advanced age. For this reason the effect of selection is extended up to duration 34 for younger issue ages. This experience includes 32,715 deaths.

### Lapse Rates

Ultimate voluntary termination rates range from 1.1% to 5.4% based on issue age band and benefit category (lifetime and non-lifetime). No additional lapse due to the proposed rate increase is projected. Exhibit IV provides the additional lapses and risk amount reductions experienced by the company at different levels of rate increase.

Exhibit V provides the lapse experience across all LTC forms combined from policy anniversaries in 2000 through policy anniversaries in 2011. The expected basis shown in this exhibit reflects the currently assumed lapse rates.

Lapse experience varies by issue age and benefit type (lifetime benefit versus non-lifetime benefit). We applied judgment to the data contained in this exhibit to derive the best estimate lapse assumption. For later durations, we often looked at several durations' experience together to improve credibility. We also made an effort to reflect that lapse rates seem to increase some at older attained ages. This experience includes 33,760 lapses, including 9,225 in durations 8 and later. The exposure and actual lapses close to the implementation of rate increases are excluded from this analysis. For non-lifetime benefits, lapses include policies that have maximized their benefits.

We have experienced much stronger customer loyalty than anticipated at the time these policy forms were initially priced. The resulting high policy persistency has unfortunately had an adverse impact on loss ratios.

### Adverse Selection

No adverse selection is projected.

### Expenses

Expenses have not been explicitly projected. It is assumed that the originally filed expense assumptions remain appropriate, except that commission rates were reduced in 2008 and 2011 so that total commissions paid before and after the prior increases in premium are similar. In addition, as part of this rate increase process, the company

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anticipates adjusting commission rates so that the total commissions paid before and after this increase in premium are similar.

The above assumptions are based on actual inforce experience of RiverSource Life and are deemed reasonable for this particular policy form; they do not include any provision for profit or contingencies.

Exhibit VI provides the assumptions used in the 2007 rate increase filing, and Exhibit VII provides the assumptions used in the 2011 rate increase filing.

**6. Marketing Method**

This policy form was marketed by agents of RiverSource Life.

**7. Underwriting Description**

This policy form was fully underwritten with the use of various underwriting tools in addition to the application, which may have included medical records, an attending physician’s statement, telephone interview and/or face-to-face assessment.

**8. Premiums**

Premiums are unisex and payable for life. The premiums vary by issue age, the initial amount of the facility and home and community care daily maximum benefit amounts, the maximum lifetime benefit amount, the deductible period, the Benefit Increase Option, and marital status at issue.

**9. Issue Age Range**

The issue ages are from 40 to 79 except for the benefit structures with 90-day deductible period, 2- or 4-year maximum policy benefit, and home and community care daily maximum 50% or 75% of facility care daily maximum, which are issued to age 84.

**10. Area Factors**

Area factors are not used for this product.

**11. Premium Modalization Rules**

The following modal factors and nationwide percent distributions (based on inforce count as of 3/31/2013) are applied to the annual premium (AP):

<b>Premium Mode</b>	<b>Modal Factors</b>	<b>Percent Distribution</b>
Annual	1.0000*AP + 0.0	39.5%
Semi-Annual	0.5020*AP+ 0.4	6.3%
Quarterly	0.2580*AP+ 0.5	7.2%

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Monthly	0.0868*AP+ 0.6	47.0%
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12. Active Life Reserves

Active life reserves, although they have significant impact, have not been used in this rate increase analysis, except as described in Exhibits X and XI.

13. Trend Assumptions

As this is not medical insurance, we have not included any explicit medical cost trends in the projections.

14. Past and Future Policy Experience

Nationwide experience for policy form 30160A, subject to endorsement form 32100, is shown in Exhibit VIII, and Virginia experience for policy form 30160A-VA, subject to endorsement form 32100, is shown in Exhibit IX. Exhibit X shows nationwide past experience including earned premiums, incurred claims, increase in active life reserves and incurred loss ratios by calendar year, and Exhibit XI shows corresponding Virginia experience. These exhibits include any previously implemented rate increases as described in Section 15 of this memorandum.

Please note that RiverSource Life does not consider Virginia-specific experience as fully credible but is providing it as required. The proposed rates have been developed using nationwide experience.

Historical experience is shown by claim incurral year with the loss ratio for each calendar year. The following formula provides an illustration of the historical incurred loss ratio calculation for each calendar year:

$$ILR_j = \frac{\sum_k \sum_t {}_j Pmt_t^k * v^{t-k} + \sum_k ({}_j CR_{ValDate}^k + {}_j IBNR_{ValDate}^k) * v^{ValDate-k}}{EP_j}$$

$ILR_j$  = incurred loss ratio for year  $j$

${}_j Pmt_t^k$  = claim payments at time  $t$  on claims incurred at time  $k$  in year  $j$

${}_j CR_{ValDate}^k$  = open claim reserve held on March 31, 2013 for claims incurred at time  $k$  in year  $j$

${}_j IBNR_{ValDate}^k$  = incurred but not reported reserve as of March 31, 2013 attributable to claims incurred at time  $k$  in year  $j$

$EP_j$  = earned premium in year  $j$

$ValDate$  = March 31, 2013

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$j$  = year of claim incurral

$k$  = date of claim incurral

$t$  = date of claim payment

$v = 1 / 1.045 = 0.956938$

A historical annual paid loss ratio is calculated, with and without interest, as historical paid claims divided by historical earned premiums, where paid claims are calculated as the actual claims paid in that year. A historical annual incurred loss ratio is calculated, with and without interest, as historical incurred claims divided by historical earned premiums. Actual historical incurred claims used in Exhibits VIII, IX, X and XI are determined by discounting claim payments and open claim reserves to the actual original loss date for each claim and by discounting IBNR to the time it is assumed to occur. Actual historical earned premiums used in Exhibits VIII, IX, X and XI are calculated based on the issue and, if appropriate, termination date for each policy. These items are then summed to produce a total for each calendar year. For purposes of accumulating historical experience for a historical or for a lifetime loss ratio calculation, these calendar year totals are assumed to represent a mid-year value.

A future annual paid loss ratio is calculated, with and without interest, as anticipated paid claims divided by anticipated earned premiums. A future annual incurred loss ratio is calculated, with and without interest, as anticipated incurred claims divided by anticipated earned premiums. The anticipated earned premiums, paid claims and incurred claims are projected on a seriatim basis and then summed to produce a total for each calendar year. For purposes of accumulating experience for an anticipated or for a lifetime loss ratio calculation, these calendar year totals are assumed to represent a mid-year value.

Lifetime loss ratios in Exhibits VIII and IX are as of March 31, 2013 and are calculated as the sum of accumulated historical experience and discounted future experience where accumulation and discounting of the total for each calendar year occur at 5.0%, an interest rate consistent with that assumed in the determination of premiums at the time of original pricing, and assume mid-year values.

The incurred loss ratio in Exhibits X and XI is defined as the sum of incurred claims and increase in active life reserves divided by earned premiums. The values in these exhibits are shown without interest accumulation.

**15. History of Previous Rate Revisions**

Two prior increases have been approved and implemented on this form. A 10% increase was approved in June 2007 and implemented on each contract's next policy anniversary beginning in September 2007. A 10% increase was approved in November 2011 and implemented on each contract's next policy anniversary beginning in March 2012. The actual and projected premiums in Exhibits IX and XI reflect the impact of these increases.

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The actual and projected premiums in Exhibits VIII and X reflect the accumulated rate increases as approved in Virginia and implemented on all policies from 2007 through 2013 on a nationwide basis.

**16. Requested Rate Increase and Demonstration of Satisfaction of Loss Ratio Requirements**

The company is requesting an increase of 10%.

Projected experience assuming this increase is implemented is shown in Exhibits VIII and IX. Exhibit XII provides the demonstration that this rate increase meets the dual-loss ratio standard for individual long-term care policy forms set forth in the NAIC Model Bulletin for Alternative Filing Requirements for Long-Term Care Premium Rate Increases, as adopted by the NAIC on December 18, 2013.

Current rate tables for this form are included with this memorandum in Exhibit XIII, and corresponding rate tables with the requested rate increase are included with this memorandum in Exhibit XIV.

**17. Virginia Average Annual Premium (Annual Premium Based on March 31, 2013 Inforce)**

Before increase:       \$1,690  
After increase:        \$1,859

These values assume all previously approved premium increases have been implemented.

**18. Proposed Effective Date**

This rate increase will apply to policies on their policy anniversary date following a 60-day policyholder notification period.

**19. Nationwide Distribution of Business as of 3/31/2013 (based on inforce count)**

By Issue Age:

<b>Issue Ages</b>	<b>Percent Distribution</b>
<55	37.3%
55-59	27.6%
60-64	20.7%
65-69	9.3%
70-74	3.6%
75-79	1.3%
>79	0.2%

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By Deductible Period:

<b>Deductible Period</b>	<b>Percent Distribution</b>
20-day	19.0%
90-day	81.0%

By Benefit Period:

<b>Benefit Period</b>	<b>Percent Distribution</b>
2-Year	3.0%
4-Year	29.4%
6-Year	30.7%
Unlimited	36.9%

By Inflation Protection Option:

<b>Inflation Option</b>	<b>Percent Distribution</b>
None	6.3%
Simple	35.5%
Compound	58.2%

**20. Number of Policyholders**

As of 3/31/2013, the number of policies and annual premium inforce, assuming all premium increases previously approved in Virginia have been implemented in both the state and nationwide, is:

	<b>Number of Insured</b>	<b>Annual Premium</b>
Virginia	1,647	\$2,784,003
Nationwide	30,369	\$52,522,627

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**21. Actuarial Certification**

I am a Fellow of the Society of Actuaries and a Member of the American Academy of Actuaries, and I meet the Academy's qualification standards for preparing health rate filings and to render the actuarial opinion contained herein.

I believe this rate filing is in compliance with the applicable laws of the State of Virginia and with the rules of the Bureau. This memorandum has been prepared in conformity with all applicable Actuarial Standards of Practice, including ASOP No. 8.

I hereby certify that, to the best of my knowledge and judgment, this rate submission is in compliance with the applicable laws and regulations of the state where it is filed. Furthermore, the actuarial assumptions are appropriate. In my opinion, the rates are not excessive or unfairly discriminatory. The premiums are reasonable in relation to the benefits based on the loss ratio standard set forth in 14 VAC 5-200-150(B).



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Anju Gupta-Lavey, FSA, MAAA  
Actuary  
RiverSource Life Insurance Company  
Date: May 30, 2014

**EXHIBIT I**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Original Pricing Assumptions:**

**Mortality:** 1983 Individual Annuitant Mortality Table

**Lapse Rates:**

Duration	Issue Age				
	45	55	65	75	82
1	10%	9%	8%	7%	6%
2	9%	8%	7%	6%	5%
3	8%	7%	6%	5%	4%
4	7%	6%	5%	4%	3%
5	6%	5%	5%	4%	3%
6+	5%	5%	5%	4%	3%

**Morbidity:**

Starting in 1989, RiverSource Life marketed nursing home policies with a zero day prior hospitalization requirement. Using the emerging experience on this business, statistics from the "1985 National Nursing Home Survey" published by the National Center for Health Statistics, and input provided from RiverSource Life's reinsurer, the expected frequencies and severities of claims were developed for nursing home benefits. Incidence rates by issue age and duration were developed to reflect the effects of underwriting on nursing home claims incidence. It was understood that the underwriting process would include an assessment of functional and cognitive abilities if considered appropriate.

Starting in 1990, RiverSource Life also marketed home health care benefit riders. At the time of original pricing, only limited insured experience was available for home health and community care benefits. Therefore the expected claim costs for these benefits were derived from general population data with the assistance of RiverSource Life's reinsurer. Both the incidence rates and the length of home health care usage for the first two years were determined through analysis of the "1982-1984 National Long Term Care Surveys", which polled elderly people who manifested impairments in ADLs. The home health care incidence rates were modified by loading for cognitive impairment as a benefit trigger.

The data from the "1985 National Nursing Home Survey" was used to extrapolate the length of home health care usage after the first two years. Additionally, experience data from continuing care retirement communities was used to verify the claim cost assumptions and to provide guidance in translating general population experience to anticipated insured population experience. Incidence rates by issue age and duration were developed to reflect the effects of underwriting on home health care claims incidence.

Claim costs for the Benefit Increase Options were based on these claim costs with the benefit loaded to reflect the scheduled increases in benefits. The nonforfeiture benefit claim costs were determined by assumptions consistent with those used in establishing premium rates. The above described experience was also used to determine marital discounts.

It should be recognized that considerable judgment was made with respect to expected claim costs, especially for non-institutional benefits. After using all available data, total expected claim costs were developed that represented reasonable estimates of aggregate long term care experience under the applicable underwriting criteria.

The following selection factors were used:

Duration	Issue Age Band			
	40-59	60-69	70-79	80+
1	40%	35%	30%	20%
2	50%	55%	60%	80%
3	55%	60%	75%	100%
4	60%	65%	90%	100%
5	65%	70%	100%	100%
6	70%	75%	100%	100%
7	75%	80%	100%	100%
8	80%	90%	100%	100%
9	90%	100%	100%	100%
10+	100%	100%	100%	100%

**Interest Rate:** 5.0%

**EXHIBIT I**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Current Assumptions:**

**Mortality:** 1983 Individual Annuitant Mortality Basic Table with selection consistent with experience

**Mortality Selection Factors**

Duration	Issue Age Band					
	<58	58-62	63-67	68-72	73-77	78+
1	20%	20%	25%	20%	20%	25%
2	25%	35%	40%	30%	25%	25%
3	35%	45%	45%	40%	40%	40%
4	40%	50%	45%	45%	45%	45%
5	45%	50%	45%	55%	50%	55%
6	50%	50%	55%	55%	60%	60%
7	50%	55%	60%	60%	65%	65%
8	50%	55%	60%	60%	70%	75%
9	50%	55%	65%	70%	75%	85%
10	60%	65%	70%	75%	75%	85%
11	60%	70%	70%	80%	75%	85%
12	60%	70%	70%	80%	90%	90%
13	60%	70%	75%	85%	90%	95%
14	60%	75%	75%	90%	90%	95%
15	60%	75%	80%	90%	95%	95%
16	75%	75%	80%	90%	95%	100%
17	75%	75%	80%	95%	100%	100%
18	75%	75%	80%	95%	100%	100%
19	75%	80%	80%	95%	100%	100%
20	75%	80%	90%	95%	100%	100%
21	75%	80%	90%	100%	100%	100%
22	80%	85%	90%	100%	100%	100%
23	80%	85%	95%	100%	100%	100%
24	85%	90%	95%	100%	100%	100%
25	90%	90%	100%	100%	100%	100%
26	90%	90%	100%	100%	100%	100%
27	90%	90%	100%	100%	100%	100%
28	90%	95%	100%	100%	100%	100%
29	90%	95%	100%	100%	100%	100%
30	90%	100%	100%	100%	100%	100%
31	90%	100%	100%	100%	100%	100%
32	95%	100%	100%	100%	100%	100%
33	95%	100%	100%	100%	100%	100%
34	95%	100%	100%	100%	100%	100%
35+	100%	100%	100%	100%	100%	100%

**EXHIBIT I**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Current Assumptions (continued):**

**Lapse Rates:**

Duration	Lifetime Benefit			Duration	Non-Lifetime Benefit		
	Issue Age Band				Issue Age Band		
	<63	63-72	73+		<63	63-72	73+
1	6.9%	6.8%	7.0%	1	6.9%	7.1%	5.3%
2	6.5%	4.5%	3.5%	2	6.0%	4.8%	4.6%
3	4.8%	3.5%	3.5%	3	4.2%	3.3%	3.1%
4	3.6%	2.6%	1.9%	4	3.1%	2.9%	2.9%
5	2.6%	1.9%	1.3%	5	2.3%	2.0%	2.2%
6	1.9%	1.6%	1.3%	6	1.7%	1.9%	2.1%
7	1.5%	1.1%	1.3%	7	1.5%	1.6%	2.3%
8	1.1%	1.1%	1.3%	8	1.2%	1.4%	2.5%
9	1.1%	1.1%	1.3%	9	1.2%	1.3%	2.7%
10	0.8%	1.1%	1.3%	10	1.0%	1.3%	3.4%
11	0.7%	0.9%	1.4%	11	1.0%	1.5%	3.9%
12	0.7%	0.9%	1.5%	12	0.9%	1.5%	4.0%
13	0.7%	0.9%	1.5%	13	0.8%	1.5%	4.4%
14	0.7%	0.9%	1.6%	14	0.8%	1.5%	4.8%
15	0.7%	0.9%	1.6%	15	0.7%	1.6%	4.9%
16	0.7%	1.0%	1.7%	16	0.7%	1.8%	5.4%
17	0.7%	1.1%	1.7%	17	0.8%	2.0%	5.4%
18	0.7%	1.2%	1.8%	18	0.8%	2.2%	5.4%
19	0.7%	1.2%	1.8%	19	0.9%	2.4%	5.4%
20	0.8%	1.2%	1.9%	20	0.9%	2.6%	5.4%
21	0.8%	1.3%	1.9%	21	0.9%	2.8%	5.4%
22	0.8%	1.3%	2.0%	22	0.9%	3.0%	5.4%
23	0.8%	1.4%	2.0%	23	1.0%	3.2%	5.4%
24	0.9%	1.4%	2.0%	24	1.2%	3.4%	5.4%
25	0.9%	1.4%	2.0%	25	1.4%	3.6%	5.4%
26	0.9%	1.4%	2.0%	26	1.5%	3.8%	5.4%
27	1.0%	1.4%	2.0%	27	1.6%	4.0%	5.4%
28	1.0%	1.4%	2.0%	28	2.1%	4.0%	5.4%
29	1.0%	1.4%	2.0%	29	2.4%	4.0%	5.4%
30	1.0%	1.4%	2.0%	30	2.6%	4.0%	5.4%
31	1.1%	1.4%	2.0%	31	2.9%	4.0%	5.4%
32	1.1%	1.4%	2.0%	32	3.1%	4.0%	5.4%
33	1.1%	1.4%	2.0%	33	3.2%	4.0%	5.4%
34	1.1%	1.4%	2.0%	34	3.3%	4.0%	5.4%
35	1.1%	1.4%	2.0%	35	3.4%	4.0%	5.4%
36+	1.1%	1.4%	2.0%	36+	3.5%	4.0%	5.4%

**EXHIBIT I**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Current Assumptions (continued):**

**Morbidity:** Expected Claim Costs are the product of original pricing expected claim costs and an actual-to-expected adjustment factor. Actual-to-expected adjustment factors were developed from actual emerging experience through anniversaries ending December 2011. Morbidity used in the projections has also been reduced by 5% for anticipated improved claim experience from changes in claim management starting in 2003.

**Lifetime Benefit Actual-to-Expected Adjustment Factors**

Duration	Age at Issue						
	<53	53-57	58-62	63-67	68-72	73-77	78+
1	0.10	0.35	0.35	0.40	0.45	1.20	1.70
2	0.10	0.35	0.35	0.45	0.50	1.25	1.70
3	0.10	0.35	0.35	0.45	0.60	1.25	1.70
4	0.10	0.35	0.35	0.95	0.80	1.30	1.70
5	0.10	0.35	0.35	0.95	0.90	1.30	1.70
6	0.10	0.35	0.35	0.95	1.00	1.35	1.70
7	0.15	0.35	0.40	0.95	1.15	1.40	1.70
8	0.15	0.35	0.50	0.90	1.15	1.35	1.70
9	0.15	0.35	0.60	0.95	1.15	1.45	1.70
10	0.15	0.35	0.60	0.95	1.15	1.50	1.70
11	0.15	0.35	0.65	0.95	1.15	1.50	1.70
12	0.25	0.40	0.65	0.95	1.15	1.50	1.70
13	0.30	0.45	0.70	1.00	1.15	1.50	1.70
14	0.30	0.50	0.75	1.00	1.15	1.50	1.70
15	0.30	0.50	0.75	1.00	1.15	1.50	1.70
16	0.30	0.55	0.75	1.00	1.15	1.50	1.70
17	0.35	0.60	0.80	1.05	1.15	1.50	1.70
18	0.35	0.65	0.80	1.05	1.15	1.50	1.70
19	0.35	0.70	0.80	1.05	1.15	1.60	1.70
20	0.45	0.75	0.85	1.05	1.15	1.60	1.70
21	0.50	0.80	0.85	1.05	1.15	1.60	1.80
22	0.55	0.85	0.85	1.05	1.15	1.70	1.80
23	0.60	0.85	0.90	1.05	1.15	1.70	1.80
24	0.65	0.85	0.90	1.05	1.15	1.70	1.90
25	0.70	0.85	0.90	1.05	1.15	2.00	1.90
26	0.75	0.85	0.95	1.05	1.15	2.00	1.90
27	0.80	0.85	0.95	1.05	1.15	2.10	2.00
28	0.80	0.85	1.00	1.05	1.15	2.10	2.00
29	0.90	0.90	1.00	1.05	1.15	2.10	2.00
30	0.90	0.95	1.05	1.05	1.15	2.10	2.00
31	0.90	0.98	1.08	1.05	1.15	2.10	2.03
32	0.94	0.98	1.08	1.05	1.15	2.10	2.03
33	0.94	0.98	1.08	1.05	1.15	2.10	2.03
34	1.00	0.98	1.08	1.05	1.15	2.10	2.03
35+	1.00	1.00	1.10	1.05	1.15	2.10	2.05

**EXHIBIT I**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Current Assumptions (continued):**

**Morbidity (continued):**

**Non-Lifetime Benefit Actual-to-Expected Adjustment Factors**

Duration	Age at Issue								
	<48	48-52	53-57	58-62	63-67	68-72	73-77	78-82	83+
1	0.10	0.10	0.10	0.20	0.20	0.45	0.65	0.70	1.50
2	0.10	0.10	0.10	0.25	0.30	0.45	0.85	0.90	1.60
3	0.15	0.15	0.15	0.30	0.35	0.55	1.05	0.90	1.70
4	0.20	0.20	0.20	0.40	0.35	0.80	1.15	1.10	2.15
5	0.25	0.25	0.25	0.45	0.45	0.80	1.40	1.40	2.15
6	0.30	0.30	0.35	0.50	0.60	1.00	1.40	1.85	2.15
7	0.30	0.30	0.40	0.55	0.75	1.05	1.45	2.05	2.15
8	0.30	0.30	0.45	0.60	0.85	1.15	1.55	2.30	2.15
9	0.35	0.35	0.55	0.75	0.95	1.20	1.70	2.60	2.20
10	0.40	0.40	0.55	0.80	1.00	1.25	1.70	2.60	2.20
11	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
12	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
13	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
14	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
15	0.45	0.45	0.55	0.95	1.05	1.25	1.75	2.65	2.20
16	0.45	0.45	0.55	0.95	1.05	1.25	1.75	2.65	2.20
17	0.50	0.50	0.60	0.95	1.05	1.25	1.75	2.65	2.20
18	0.50	0.50	0.65	0.95	1.05	1.25	1.75	2.65	2.20
19	0.55	0.55	0.70	0.95	1.05	1.25	1.80	2.65	2.20
20	0.55	0.55	0.80	0.95	1.05	1.25	1.80	2.65	2.20
21	0.60	0.60	0.80	0.95	1.05	1.25	1.80	2.70	2.20
22	0.60	0.60	0.85	0.95	1.05	1.25	1.80	2.70	2.20
23	0.65	0.65	0.85	1.00	1.05	1.25	1.80	2.70	2.20
24	0.65	0.65	0.90	1.00	1.05	1.25	1.90	2.70	2.20
25	0.70	0.70	0.90	1.00	1.05	1.25	1.90	2.70	2.20
26	0.75	0.75	0.95	1.00	1.05	1.25	1.90	2.70	2.20
27	0.80	0.80	0.95	1.00	1.05	1.25	1.90	2.70	2.20
28	0.85	0.85	1.00	1.00	1.05	1.25	1.90	2.70	2.20
29	0.90	0.90	1.00	1.05	1.05	1.25	2.00	2.70	2.20
30	0.90	0.90	1.00	1.05	1.05	1.25	2.00	2.70	2.20
31	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
32	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
33	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
34	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
35+	1.00	1.00	1.00	1.05	1.10	1.25	2.00	2.70	2.20

**Interest Rate:** 5.0%

**EXHIBIT II**  
**RiverSource Life Insurance Company**  
**Nationwide Long Term Care Claim Experience**  
**Policy Years through 2011**  
**Policy Form: 30160A, Subject to Endorsement 32100**  
**Expected Claims Based on Current Assumptions**

<b>SPLIT BY BENEFIT PERIOD AND DURATION</b>									
<b>Duration</b>	<b>Lifetime Benefit Period</b>			<b>Non-Lifetime Benefit Period</b>			<b>All</b>		
	<b>Actual</b>	<b>Expected</b>	<b>A/E</b>	<b>Actual</b>	<b>Expected</b>	<b>A/E</b>	<b>Actual</b>	<b>Expected</b>	<b>A/E</b>
1	567,897	551,181	103.0%	197,412	502,628	39.3%	765,309	1,053,808	72.6%
2	1,270,967	919,703	138.2%	978,154	1,167,961	83.7%	2,249,122	2,087,663	107.7%
3	510,274	1,136,415	44.9%	2,029,044	1,765,729	114.9%	2,539,318	2,902,145	87.5%
4	3,751,141	1,755,258	213.7%	2,640,754	2,617,393	100.9%	6,391,895	4,372,651	146.2%
5	3,104,482	2,128,256	145.9%	2,770,855	3,635,723	76.2%	5,875,337	5,763,978	101.9%
6	1,980,275	2,618,346	75.6%	6,298,342	4,946,927	127.3%	8,278,617	7,565,273	109.4%
7	4,011,625	3,302,962	121.5%	5,684,023	6,267,141	90.7%	9,695,648	9,570,103	101.3%
8	1,878,936	3,980,642	47.2%	7,332,395	7,927,619	92.5%	9,211,331	11,908,261	77.4%
9	3,959,686	4,699,626	84.3%	10,126,649	9,642,295	105.0%	14,086,335	14,341,921	98.2%
10	3,145,402	3,673,031	85.6%	8,312,445	7,450,457	111.6%	11,457,847	11,123,488	103.0%
11	1,836,590	1,614,481	113.8%	3,887,484	3,178,398	122.3%	5,724,074	4,792,879	119.4%
<b>Total</b>	<b>26,017,276</b>	<b>26,379,901</b>	<b>98.6%</b>	<b>50,257,557</b>	<b>49,102,271</b>	<b>102.4%</b>	<b>76,274,832</b>	<b>75,482,171</b>	<b>101.1%</b>

<b>SPLIT BY ISSUE AGE</b>				
<b>Issue Age</b>	<b>Actual</b>	<b>Expected</b>	<b>A/E</b>	<b>Claim Count</b>
<43	87,977	55,797	157.7%	3
43-47	81,878	325,141	25.2%	6
48-52	1,502,970	1,513,269	99.3%	32
53-57	6,694,374	6,965,730	96.1%	105
58-62	11,915,932	13,077,519	91.1%	225
63-67	16,367,499	16,525,731	99.0%	240
68-72	14,796,144	14,426,852	102.6%	230
73-77	15,576,820	14,432,764	107.9%	238
78-82	8,026,013	7,115,306	112.8%	106
83+	1,225,225	1,044,064	117.4%	21
<b>Total</b>	<b>76,274,832</b>	<b>75,482,171</b>	<b>101.1%</b>	<b>1,206</b>

**EXHIBIT III**  
**RiverSource Life Insurance Company**  
**Long-Term Care Mortality Experience**  
**For Policy Anniversaries in 2000 through Policy Anniversaries in 2011**  
**Experience Includes All Long-Term Care Forms Combined**  
**Expressing Deaths in Terms of Policy Count**  
**Expected Deaths Based on Current Assumptions**

<b>SUMMARY BY DURATION</b>				
<b>Duration</b>	<b>Actual Deaths</b>	<b>Expected Deaths</b>	<b>A/E</b>	<b>Difference</b>
1	100	98	102%	2
2	216	218	99%	(2)
3	418	399	105%	19
4	531	544	98%	(13)
5	811	800	101%	11
6	1,130	1,114	101%	16
7	1,470	1,434	103%	36
8	1,731	1,726	100%	5
9	2,149	2,147	100%	2
10	2,544	2,571	99%	(27)
11	2,943	2,918	101%	25
12	2,933	2,964	99%	(31)
13	2,834	2,833	100%	1
14	2,608	2,620	100%	(12)
15	2,428	2,484	98%	(56)
16	2,076	2,096	99%	(20)
17	1,736	1,754	99%	(18)
18	1,449	1,438	101%	11
19	1,150	1,148	100%	2
20	838	876	96%	(38)
21	533	515	104%	18
22	87	81	107%	6
<b>Total</b>	<b>32,715</b>	<b>32,779</b>	<b>100%</b>	<b>(64)</b>

<b>SUMMARY BY ISSUE AGE</b>				
<b>Issue Age</b>	<b>Actual Deaths</b>	<b>Expected Deaths</b>	<b>A/E</b>	<b>Difference</b>
<43	21	18	114%	3
43-47	102	112	91%	(10)
48-52	749	761	98%	(12)
53-57	2,252	2,245	100%	7
58-62	5,142	5,272	98%	(130)
63-67	7,904	7,863	101%	41
68-72	8,117	8,123	100%	(6)
73-77	5,639	5,637	100%	2
78-82	2,426	2,392	101%	34
83+	363	356	102%	7
<b>Total</b>	<b>32,715</b>	<b>32,779</b>	<b>100%</b>	<b>(64)</b>

<b>SUMMARY BY ALL DURATION / ISSUE AGE CELLS</b>			
<b>Actual Deaths</b>	<b>Expected Deaths</b>	<b>A/E</b>	<b>Difference</b>
<b>32,715</b>	<b>32,779</b>	<b>100%</b>	<b>(64)</b>

**EXHIBIT IV**  
**RiverSource Life Insurance Company**  
**Lapses and Benefit Reductions<sup>1</sup>**  
**Nationwide Experience**  
**Experience Includes All Long-Term Care Forms Combined**

<b>Additional Lapses Due to Rate Increase</b>									
<b>Increase Percent</b>	<b>Average Increase</b>	<b>Year of Increase</b>							<b>Weighted Average</b>
		<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	
< 10%	6.7%			0.9%	1.5%	1.7%	0.9%	1.2%	1.3%
10% - 14.9%	10.5%	0.7%	1.7%	1.4%	1.6%	2.0%	1.4%	1.3%	1.5%
15% - 19.9%	15.3%	0.7%	2.5%	1.3%	1.8%	1.8%	1.6%	1.4%	1.7%
20% - 29.9%	23.6%	1.8%	1.7%	1.2%	1.6%	2.5%		4.4%	1.7%
30%+	34.7%	2.9%	2.7%	2.0%	3.7%	13.2%			2.9%
<b>Total</b>	<b>16.3%</b>	<b>2.6%</b>	<b>2.5%</b>	<b>1.3%</b>	<b>1.8%</b>	<b>1.9%</b>	<b>1.5%</b>	<b>1.4%</b>	<b>1.9%</b>

<b>Policies Choosing Reduction in Benefits in Relation to Rate Increase Percentage</b>									
<b>Increase Percent</b>	<b>Average Increase</b>	<b>Year of Increase</b>							<b>Weighted Average</b>
		<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	
< 10%	6.7%			0.3%	0.2%	0.2%	0.4%	0.3%	0.2%
10% - 14.9%	10.5%	0.6%	0.6%	0.5%	0.4%	0.5%	0.4%	0.5%	0.5%
15% - 19.9%	15.3%	1.1%	0.8%	0.3%	0.7%	0.7%	0.6%	0.9%	0.7%
20% - 29.9%	23.6%	1.7%	1.8%	1.8%	1.4%	2.6%		1.8%	1.7%
30%+	34.7%	3.1%	2.8%	2.5%	3.5%	7.3%			3.0%
<b>Total</b>	<b>16.3%</b>	<b>1.4%</b>	<b>1.3%</b>	<b>0.8%</b>	<b>0.7%</b>	<b>0.8%</b>	<b>0.7%</b>	<b>0.8%</b>	<b>0.9%</b>

<sup>1</sup> The total percent reduction in benefit is typically no more than the percentage increase in premium.

EXHIBIT V  
RiverSource Life Insurance Company  
Long-Term Care Lapse Experience  
For Policy Anniversaries in 2000 through Policy Anniversaries in 2011  
Experience Includes All Long-Term Care Forms Combined  
Expressing Lapses in Terms of Policy Count  
Expected Lapses Based on Current Assumptions

LIFETIME BENEFIT PERIOD																
Duration	Issue Ages 35-62				Issue Ages 63-72				Issue Ages 73+				All Issue Ages			
	Actual			Expected Lapses	Actual			Expected Lapses	Actual			Expected Lapses	Actual			Expected Lapses
	Lapses	Exposure	Rate		Lapses	Exposure	Rate		Lapses	Exposure	Rate		Lapses	Exposure	Rate	
1	1,352	19,701	6.9%	6.9%	261	3,859	6.8%	6.8%	37	529	7.0%	7.0%	1,650	24,088	6.8%	6.9%
2	1,669	25,851	6.5%	6.5%	265	5,869	4.5%	4.5%	30	856	3.5%	3.5%	1,964	32,576	6.0%	6.1%
3	1,552	32,493	4.8%	4.8%	287	8,144	3.5%	3.5%	42	1,213	3.5%	3.5%	1,881	41,850	4.5%	4.5%
4	1,416	39,280	3.6%	3.6%	265	10,078	2.6%	2.6%	29	1,494	1.9%	1.9%	1,710	50,852	3.4%	3.4%
5	1,270	48,520	2.6%	2.6%	254	13,213	1.9%	1.9%	27	2,028	1.3%	1.3%	1,551	63,762	2.4%	2.4%
6	967	52,208	1.9%	1.9%	255	15,516	1.6%	1.6%	31	2,497	1.2%	1.3%	1,253	70,220	1.8%	1.8%
7	773	52,358	1.5%	1.5%	195	16,645	1.2%	1.1%	48	2,770	1.7%	1.3%	1,016	71,773	1.4%	1.4%
8	550	50,915	1.1%	1.1%	195	17,353	1.1%	1.1%	38	2,869	1.3%	1.3%	783	71,137	1.1%	1.1%
9	493	47,100	1.0%	1.1%	187	17,389	1.1%	1.1%	31	2,889	1.1%	1.3%	711	67,378	1.1%	1.1%
10	357	40,122	0.9%	0.8%	211	17,181	1.2%	1.1%	30	2,901	1.0%	1.3%	598	60,204	1.0%	0.9%
11	305	36,986	0.8%	0.7%	191	18,519	1.0%	0.9%	33	3,222	1.0%	1.4%	529	58,727	0.9%	0.8%
12	199	29,615	0.7%	0.7%	143	16,808	0.9%	0.9%	40	2,851	1.4%	1.5%	382	49,274	0.8%	0.8%
13	149	22,459	0.7%	0.7%	124	14,003	0.9%	0.9%	31	2,249	1.4%	1.5%	304	38,712	0.8%	0.8%
14	108	17,892	0.6%	0.7%	86	10,942	0.8%	0.9%	29	1,645	1.8%	1.6%	223	30,479	0.7%	0.8%
15	86	13,422	0.6%	0.7%	78	8,200	1.0%	0.9%	18	1,121	1.6%	1.6%	182	22,743	0.8%	0.8%
16	59	8,071	0.7%	0.7%	60	5,560	1.1%	1.0%	19	703	2.7%	1.7%	138	14,335	1.0%	0.9%
17	42	6,305	0.7%	0.7%	55	4,818	1.1%	1.1%	14	552	2.5%	1.7%	111	11,675	1.0%	0.9%
18	19	4,360	0.4%	0.7%	46	3,720	1.2%	1.2%	10	379	2.6%	1.8%	75	8,459	0.9%	1.0%
19	19	2,351	0.8%	0.7%	30	2,026	1.5%	1.2%	3	186	1.6%	1.8%	52	4,563	1.1%	1.0%
20	12	1,137	1.1%	0.8%	19	984	1.9%	1.2%	2	69	2.9%	1.9%	33	2,190	1.5%	1.0%
21	7	907	0.8%	0.8%	10	840	1.2%	1.3%	2	60	3.3%	1.9%	19	1,807	1.1%	1.1%
22	4	285	1.4%	0.8%	3	251	1.2%	1.3%	0	18	0.0%	2.0%	7	554	1.3%	1.1%
All Durations	11,408	552,338	2.1%	2.1%	3,220	211,917	1.5%	1.5%	544	33,102	1.6%	1.6%	15,172	797,357	1.9%	1.9%
Durations 8 and later	2,409	281,927	0.9%	0.9%	1,438	138,594	1.0%	1.0%	300	21,715	1.4%	1.4%	4,147	442,236	0.9%	0.9%

NON-LIFETIME BENEFIT PERIOD																
Duration	Issue Ages 35-62				Issue Ages 63-72				Issue Ages 73+				All Issue Ages			
	Actual			Expected Lapses	Actual			Expected Lapses	Actual			Expected Lapses	Actual			Expected Lapses
	Lapses	Exposure	Rate		Lapses	Exposure	Rate		Lapses	Exposure	Rate		Lapses	Exposure	Rate	
1	1,927	27,994	6.9%	6.9%	677	9,598	7.1%	7.1%	116	2,177	5.3%	5.3%	2,720	39,770	6.8%	6.9%
2	2,079	34,647	6.0%	6.0%	644	13,309	4.8%	4.8%	151	3,289	4.6%	4.6%	2,874	51,244	5.6%	5.6%
3	1,599	38,297	4.2%	4.2%	542	16,222	3.3%	3.3%	128	4,194	3.1%	3.1%	2,269	58,713	3.9%	3.9%
4	1,227	39,300	3.1%	3.1%	503	17,424	2.9%	2.9%	134	4,614	2.9%	2.9%	1,864	61,338	3.0%	3.0%
5	975	41,636	2.3%	2.3%	391	19,997	2.0%	2.0%	124	5,566	2.2%	2.2%	1,490	67,199	2.2%	2.2%
6	712	40,884	1.7%	1.7%	408	21,641	1.9%	1.9%	133	6,387	2.1%	2.1%	1,253	68,912	1.8%	1.8%
7	566	37,665	1.5%	1.5%	325	21,705	1.5%	1.6%	149	6,647	2.2%	2.3%	1,040	66,016	1.6%	1.6%
8	431	36,886	1.2%	1.2%	316	22,005	1.4%	1.4%	150	6,595	2.3%	2.5%	897	65,486	1.4%	1.4%
9	381	35,498	1.1%	1.2%	288	21,531	1.3%	1.3%	155	6,296	2.5%	2.7%	824	63,325	1.3%	1.4%
10	249	26,568	0.9%	1.0%	212	18,992	1.1%	1.3%	183	5,718	3.2%	3.4%	644	51,279	1.3%	1.4%
11	191	20,698	0.9%	1.0%	278	17,899	1.6%	1.5%	194	5,405	3.6%	3.9%	663	44,002	1.5%	1.6%
12	160	15,654	1.0%	0.9%	220	15,368	1.4%	1.5%	168	4,416	3.8%	4.0%	548	35,437	1.5%	1.5%
13	91	10,814	0.8%	0.8%	180	12,036	1.5%	1.5%	142	3,301	4.3%	4.4%	413	26,151	1.6%	1.6%
14	57	7,737	0.7%	0.8%	120	9,125	1.3%	1.5%	124	2,299	5.4%	4.8%	301	19,162	1.6%	1.6%
15	42	6,206	0.7%	0.7%	125	7,199	1.7%	1.6%	79	1,598	4.9%	4.9%	246	15,003	1.6%	1.6%
16	29	4,142	0.7%	0.7%	95	4,881	1.9%	1.8%	57	1,009	5.7%	5.4%	181	10,032	1.8%	1.7%
17	29	2,850	1.0%	0.8%	74	3,802	1.9%	2.0%	41	718	5.7%	5.4%	144	7,371	2.0%	1.9%
18	16	1,970	0.8%	0.8%	50	2,831	1.8%	2.2%	27	468	5.8%	5.4%	93	5,269	1.8%	2.0%
19	14	1,133	1.2%	0.9%	36	1,601	2.2%	2.4%	9	219	4.1%	5.4%	59	2,952	2.0%	2.0%
20	7	560	1.3%	0.9%	28	811	3.5%	2.6%	4	106	3.8%	5.4%	39	1,476	2.6%	2.2%
21	5	319	1.6%	0.9%	15	508	3.0%	2.8%	3	54	5.5%	5.4%	23	881	2.6%	2.3%
22	0	123	0.0%	0.9%	2	144	1.4%	3.0%	1	13	7.6%	5.4%	3	280	1.1%	2.2%
All Durations	10,787	431,579	2.5%	2.5%	5,529	258,630	2.1%	2.2%	2,272	71,088	3.2%	3.3%	18,588	761,298	2.4%	2.5%
Durations 8 and later	1,702	171,157	1.0%	1.0%	2,039	138,734	1.5%	1.5%	1,337	38,215	3.5%	3.6%	5,078	348,106	1.5%	1.5%

**EXHIBIT VI**  
**RiverSource Life Insurance Company**  
**Prior 2007 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2007 Rate Increase Filing Assumptions:**

**Mortality:** 1983 Individual Annuitant Mortality Basic Table with selection consistent with experience.

**Mortality Selection Factors**

Duration	Issue Age Band					
	<58	58-62	63-67	68-72	73-77	78+
1	20%	20%	20%	20%	20%	20%
2	25%	25%	30%	30%	25%	25%
3	35%	35%	45%	50%	35%	35%
4	45%	45%	45%	50%	35%	35%
5	50%	50%	45%	50%	40%	40%
6	55%	55%	55%	60%	70%	75%
7	55%	55%	55%	65%	75%	75%
8	55%	55%	60%	65%	75%	75%
9	55%	55%	75%	80%	85%	85%
10	80%	80%	75%	80%	85%	85%
11	80%	80%	75%	85%	85%	95%
12	85%	85%	85%	90%	90%	100%
13	85%	85%	85%	90%	90%	100%
14	90%	90%	85%	90%	95%	100%
15	95%	95%	90%	95%	100%	100%
16	95%	95%	90%	95%	100%	100%
17	95%	95%	95%	95%	100%	100%
18	95%	95%	100%	100%	100%	100%
19	95%	95%	100%	100%	100%	100%
20+	100%	100%	100%	100%	100%	100%

**EXHIBIT VI**  
**RiverSource Life Insurance Company**  
**Prior 2007 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2007 Rate Increase Filing Assumptions (continued):**

**Lapse Rates:**

Duration	Lifetime Benefit			Duration	Non-Lifetime Benefit		
	Issue Age Band				Issue Age Band		
	<63	63-72	73+		<63	63-72	73+
1	6.5%	5.2%	5.0%	1	6.0%	5.4%	5.2%
2	6.5%	4.2%	2.8%	2	5.6%	4.1%	3.9%
3	4.9%	2.1%	3.5%	3	4.3%	3.0%	2.6%
4	2.9%	2.1%	1.3%	4	2.8%	1.8%	2.0%
5	2.6%	1.2%	1.2%	5	2.2%	2.6%	2.8%
6	1.8%	1.3%	1.0%	6	1.7%	1.3%	1.8%
7	1.9%	1.0%	1.0%	7	1.0%	1.0%	1.3%
8	1.0%	1.0%	1.0%	8	1.0%	1.3%	1.5%
9	0.9%	1.1%	1.3%	9	1.2%	1.3%	3.0%
10	0.9%	1.0%	1.3%	10	1.2%	1.3%	3.5%
11	0.9%	0.9%	1.3%	11	1.2%	1.3%	4.0%
12	0.9%	0.9%	1.3%	12	1.2%	1.3%	4.2%
13	0.9%	0.9%	1.3%	13	1.2%	1.3%	4.3%
14	0.9%	0.9%	1.3%	14	1.2%	1.3%	4.4%
15	0.9%	0.9%	1.3%	15	1.2%	1.6%	4.5%
16	0.9%	1.0%	1.3%	16	1.2%	1.8%	4.5%
17	0.9%	1.1%	1.3%	17	1.2%	2.0%	4.5%
18	0.9%	1.1%	1.3%	18	1.2%	2.6%	4.5%
19	0.9%	1.1%	1.3%	19	1.2%	2.8%	4.5%
20	0.9%	1.1%	1.3%	20	1.2%	3.0%	4.5%
21	0.9%	1.1%	1.3%	21	1.2%	3.5%	4.5%
22	0.9%	1.1%	1.3%	22	1.2%	3.7%	4.5%
23	0.9%	1.1%	1.3%	23	1.2%	3.8%	4.5%
24	0.9%	1.1%	1.3%	24	1.2%	3.9%	4.5%
25	0.9%	1.1%	1.3%	25	1.4%	4.0%	4.5%
26	0.9%	1.1%	1.3%	26	1.5%	4.0%	4.5%
27	1.0%	1.1%	1.3%	27	1.6%	4.0%	4.5%
28	1.0%	1.1%	1.3%	28	2.1%	4.0%	4.5%
29	1.0%	1.1%	1.3%	29	2.4%	4.0%	4.5%
30	1.0%	1.1%	1.3%	30	2.6%	4.0%	4.5%
31	1.0%	1.1%	1.3%	31	2.9%	4.0%	4.5%
32	1.0%	1.1%	1.3%	32	3.1%	4.0%	4.5%
33	1.0%	1.1%	1.3%	33	3.2%	4.0%	4.5%
34	1.0%	1.1%	1.3%	34	3.3%	4.0%	4.5%
35	1.0%	1.1%	1.3%	35	3.4%	4.0%	4.5%
36	1.0%	1.1%	1.3%	36	3.5%	4.0%	4.5%
37+	1.0%	1.1%	1.3%	37+	3.5%	4.0%	4.5%

**EXHIBIT VI**  
**RiverSource Life Insurance Company**  
**Prior 2007 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2007 Rate Increase Filing Assumptions (continued):**

**Morbidity:** Expected Claim Costs are the product of original pricing expected claim costs and an actual-to-expected adjustment factor (provided below). Morbidity used in the projections has also been reduced by 5% for anticipated improved claim experience from changes in claim management starting in 2003. Actual-to-expected adjustment factors were developed from actual emerging experience through anniversaries ending September 2005.

Duration	Actual-to-Expected Factor
1	0.600
2	0.650
3	0.700
4	0.750
5	0.800
6	0.850
7	0.900
8	0.950
9	1.000
10+	1.000

**Interest Rate:** 5.0%

**EXHIBIT VII**  
**RiverSource Life Insurance Company**  
**Prior 2011 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2011 Rate Increase Filing Assumptions:**

**Mortality:** 1983 Individual Annuitant Mortality Basic Table with selection consistent with experience

		<b>Mortality Selection Factors</b>					
		<b>Issue Age Band</b>					
Duration	<58	58-62	63-67	68-72	73-77	78+	
1	20%	20%	25%	20%	20%	25%	
2	25%	35%	40%	30%	25%	25%	
3	35%	45%	45%	45%	40%	35%	
4	40%	50%	45%	45%	45%	35%	
5	45%	50%	45%	55%	50%	55%	
6	50%	50%	55%	55%	60%	60%	
7	55%	55%	60%	60%	65%	65%	
8	55%	55%	60%	60%	70%	75%	
9	55%	55%	70%	75%	75%	85%	
10	55%	65%	70%	80%	75%	85%	
11	65%	70%	70%	80%	75%	85%	
12	65%	70%	70%	80%	85%	90%	
13	65%	70%	75%	85%	95%	100%	
14	65%	75%	75%	90%	95%	100%	
15	70%	75%	75%	90%	95%	100%	
16	70%	75%	85%	90%	95%	100%	
17	70%	75%	85%	90%	100%	100%	
18	75%	75%	85%	90%	100%	100%	
19	85%	75%	85%	95%	100%	100%	
20	85%	80%	90%	100%	100%	100%	
21	85%	85%	90%	100%	100%	100%	
22	85%	85%	90%	100%	100%	100%	
23	85%	85%	95%	100%	100%	100%	
24	85%	90%	95%	100%	100%	100%	
25	90%	90%	100%	100%	100%	100%	
26	90%	90%	100%	100%	100%	100%	
27	90%	90%	100%	100%	100%	100%	
28	90%	95%	100%	100%	100%	100%	
29	90%	95%	100%	100%	100%	100%	
30	90%	100%	100%	100%	100%	100%	
31	90%	100%	100%	100%	100%	100%	
32	95%	100%	100%	100%	100%	100%	
33	95%	100%	100%	100%	100%	100%	
34	95%	100%	100%	100%	100%	100%	
35+	100%	100%	100%	100%	100%	100%	

**EXHIBIT VII**  
**RiverSource Life Insurance Company**  
**Prior 2011 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2011 Rate Increase Filing Assumptions**

**Lapse Rates:**

Duration	Lifetime Benefit		
	Issue Age Band		
	<63	63-72	73+
1	6.8%	6.7%	6.8%
2	6.4%	4.4%	3.4%
3	4.7%	3.5%	3.4%
4	3.6%	2.6%	1.9%
5	2.6%	1.9%	1.3%
6	1.6%	1.7%	1.3%
7	1.4%	1.1%	1.3%
8	1.0%	1.1%	1.3%
9	1.0%	1.1%	1.3%
10	0.8%	1.0%	1.3%
11	0.7%	0.9%	1.4%
12	0.7%	0.9%	1.5%
13	0.7%	0.9%	1.5%
14	0.7%	0.9%	1.6%
15	0.7%	0.9%	1.6%
16	0.7%	1.0%	1.7%
17	0.7%	1.1%	1.8%
18	0.7%	1.2%	1.8%
19	0.7%	1.2%	1.8%
20	0.8%	1.2%	1.8%
21	0.8%	1.3%	1.8%
22	0.8%	1.3%	1.8%
23	0.8%	1.4%	1.8%
24	0.9%	1.4%	1.8%
25	0.9%	1.4%	1.8%
26	0.9%	1.4%	1.8%
27	1.0%	1.4%	1.8%
28	1.0%	1.4%	1.8%
29	1.0%	1.4%	1.8%
30	1.0%	1.4%	1.8%
31	1.1%	1.4%	1.8%
32	1.1%	1.4%	1.8%
33	1.1%	1.4%	1.8%
34	1.1%	1.4%	1.8%
35	1.1%	1.4%	1.8%
36+	1.1%	1.4%	1.8%

Duration	Non-Lifetime Benefit		
	Issue Age Band		
	<63	63-72	73+
1	6.9%	7.1%	5.4%
2	6.0%	4.9%	4.6%
3	4.2%	3.4%	3.1%
4	3.1%	2.9%	2.9%
5	2.4%	2.0%	2.3%
6	1.8%	1.8%	2.3%
7	1.4%	1.6%	2.4%
8	1.2%	1.3%	2.6%
9	1.2%	1.3%	2.8%
10	1.1%	1.3%	3.5%
11	1.0%	1.4%	4.0%
12	0.9%	1.4%	4.2%
13	0.8%	1.4%	4.4%
14	0.8%	1.5%	4.7%
15	0.8%	1.6%	4.9%
16	0.8%	1.8%	5.1%
17	0.8%	2.0%	5.3%
18	0.8%	2.2%	5.4%
19	0.9%	2.4%	5.4%
20	0.9%	2.6%	5.4%
21	0.9%	2.8%	5.4%
22	0.9%	3.0%	5.4%
23	1.0%	3.2%	5.4%
24	1.2%	3.4%	5.4%
25	1.4%	3.6%	5.4%
26	1.5%	3.8%	5.4%
27	1.6%	4.0%	5.4%
28	2.1%	4.0%	5.4%
29	2.4%	4.0%	5.4%
30	2.6%	4.0%	5.4%
31	2.9%	4.0%	5.4%
32	3.1%	4.0%	5.4%
33	3.2%	4.0%	5.4%
34	3.3%	4.0%	5.4%
35	3.4%	4.0%	5.4%
36+	3.5%	4.0%	5.4%

**EXHIBIT VII**  
**RiverSource Life Insurance Company**  
**Prior 2011 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2011 Rate Increase Filing Assumptions (cont):**

**Morbidity:** Expected Claim Costs are the product of original pricing expected claim costs and an actual-to-expected adjustment factor. Morbidity used in the projections has also been reduced by 5% for anticipated improved claim experience from changes in claim management starting in 2003. Actual-to-expected adjustment factors were developed from actual emerging experience through anniversaries ending December 2009.

**Lifetime Benefit Actual-to-Expected Adjustment Factors**

Duration	Age at Issue							
	<48	48-52	53-57	58-62	63-67	68-72	73-77	78+
1	0.10	0.10	0.20	0.20	0.30	0.30	1.05	1.45
2	0.08	0.10	0.25	0.25	0.30	0.30	1.05	1.45
3	0.07	0.10	0.30	0.30	0.30	0.30	1.05	1.45
4	0.07	0.10	0.30	0.30	0.95	1.00	1.05	1.60
5	0.06	0.10	0.30	0.30	0.95	1.00	1.05	1.60
6	0.06	0.10	0.30	0.30	0.95	1.00	1.05	1.60
7	0.07	0.10	0.30	0.30	0.95	1.00	1.05	1.60
8	0.07	0.25	0.35	0.40	0.95	1.05	1.20	1.60
9	0.07	0.30	0.35	0.40	0.95	1.05	1.25	1.60
10	0.07	0.30	0.35	0.50	0.95	1.15	1.25	1.60
11	0.07	0.30	0.35	0.55	0.95	1.15	1.25	1.60
12	0.07	0.30	0.40	0.60	0.95	1.15	1.25	1.60
13	0.20	0.35	0.40	0.65	0.95	1.15	1.25	1.60
14	0.27	0.35	0.40	0.70	0.95	1.15	1.25	1.60
15	0.30	0.35	0.50	0.75	0.95	1.15	1.25	1.60
16	0.30	0.35	0.55	0.80	0.95	1.15	1.25	1.60
17	0.30	0.40	0.60	0.85	0.95	1.15	1.25	1.60
18	0.35	0.40	0.65	0.85	0.95	1.15	1.25	1.60
19	0.35	0.40	0.70	0.85	0.95	1.15	1.25	1.60
20	0.35	0.50	0.75	0.85	0.95	1.15	1.25	1.60
21	0.35	0.55	0.80	0.90	1.00	1.15	1.30	1.60
22	0.40	0.60	0.85	0.90	1.00	1.15	1.30	1.60
23	0.40	0.65	0.85	0.90	1.00	1.15	1.30	1.60
24	0.40	0.70	0.85	0.95	1.00	1.15	1.30	1.60
25	0.50	0.75	0.85	0.95	1.00	1.15	1.30	1.60
26	0.55	0.80	0.85	1.00	1.00	1.15	1.30	1.60
27	0.60	0.85	0.85	1.00	1.00	1.15	1.30	1.60
28	0.65	0.85	0.85	1.00	1.00	1.15	1.30	1.60
29	0.70	0.85	0.90	1.00	1.00	1.15	1.30	1.60
30	0.75	0.85	0.95	1.00	1.00	1.15	1.30	1.60
31	0.80	0.90	1.00	1.00	1.00	1.15	1.30	1.60
32	0.85	0.90	1.00	1.00	1.00	1.15	1.30	1.60
33	0.85	0.95	1.00	1.00	1.00	1.15	1.30	1.60
34	0.85	0.95	1.00	1.00	1.00	1.15	1.30	1.60
35	0.85	1.00	1.00	1.00	1.00	1.15	1.30	1.60
36	0.90	1.00	1.00	1.00	1.00	1.15	1.30	1.60
37	0.90	1.00	1.00	1.00	1.00	1.15	1.30	1.60
38	0.95	1.00	1.00	1.00	1.00	1.15	1.30	1.60
39	0.95	1.00	1.00	1.00	1.00	1.15	1.30	1.60
40+	1.00	1.00	1.00	1.00	1.00	1.15	1.30	1.60

**EXHIBIT VII**  
**RiverSource Life Insurance Company**  
**Prior 2011 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2011 Rate Increase Filing Assumptions (cont):**

**Morbidity (continued):**

Duration	Non-Lifetime Benefit Actual-to-Expected Adjustment Factors								
	Age at Issue								
	<48	48-52	53-57	58-62	63-67	68-72	73-77	78-82	83+
1	0.10	0.10	0.10	0.25	0.25	0.50	0.50	0.50	1.25
2	0.08	0.15	0.15	0.25	0.25	0.50	0.65	0.75	1.25
3	0.07	0.15	0.15	0.40	0.35	0.60	0.65	0.75	1.45
4	0.07	0.15	0.15	0.40	0.35	0.60	0.65	0.75	2.00
5	0.06	0.15	0.15	0.40	0.35	0.60	1.30	0.75	2.00
6	0.06	0.15	0.35	0.45	0.65	1.10	1.30	1.50	2.00
7	0.10	0.15	0.35	0.45	0.85	1.10	1.30	1.60	2.00
8	0.10	0.25	0.35	0.60	0.90	1.25	1.30	1.70	2.00
9	0.10	0.25	0.35	0.70	1.00	1.25	1.30	1.70	2.00
10	0.10	0.25	0.35	0.70	1.05	1.25	1.30	1.70	2.00
11	0.11	0.30	0.35	0.70	1.05	1.25	1.30	1.70	2.00
12	0.11	0.30	0.40	0.70	1.05	1.25	1.30	1.70	2.00
13	0.20	0.30	0.40	0.70	1.05	1.25	1.30	1.70	2.00
14	0.23	0.30	0.40	0.70	1.05	1.25	1.30	1.70	2.00
15	0.25	0.30	0.40	0.80	1.05	1.25	1.30	1.70	2.00
16	0.30	0.30	0.60	0.80	1.05	1.25	1.30	1.70	2.00
17	0.30	0.40	0.60	0.80	1.05	1.25	1.30	1.70	2.00
18	0.30	0.40	0.60	0.80	1.05	1.25	1.30	1.70	2.00
19	0.30	0.40	0.60	0.85	1.05	1.25	1.30	1.70	2.00
20	0.30	0.40	0.80	1.00	1.05	1.25	1.30	1.70	2.00
21	0.30	0.60	0.80	1.00	1.05	1.25	1.30	1.70	2.00
22	0.40	0.60	0.80	1.00	1.05	1.25	1.30	1.70	2.00
23	0.40	0.60	0.80	1.00	1.05	1.25	1.30	1.70	2.00
24	0.40	0.60	0.85	1.00	1.05	1.25	1.30	1.70	2.00
25	0.40	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
26	0.60	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
27	0.60	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
28	0.60	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
29	0.60	0.85	1.00	1.00	1.05	1.25	1.30	1.70	2.00
30	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
31	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
32	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
33	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
34	0.85	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
35+	1.00	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00

**Interest Rate:** 5.0%

**EXHIBIT VIII**  
**RiverSource Life Insurance Company**  
**Nationwide Experience Projections with No Increase**  
**Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis**  
**Policy Form: 30160A, Subject to Endorsement Form 32100**

	Calendar Year	Ending Policies Inforce	Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest					Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
			Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio		
Historical Experience	2000	9,837	3,318,006	0	0	0.0%	0.0%	6,180,744	0	0	0.0%	0.0%	5.00%	1.8628
	2001	25,544	26,856,424	22,638	521,781	0.1%	1.9%	47,645,561	40,162	925,684	0.1%	1.9%	5.00%	1.7741
	2002	39,114	48,223,494	145,719	1,733,934	0.3%	3.6%	81,478,614	246,207	2,929,661	0.3%	3.6%	5.00%	1.6896
	2003	37,807	58,081,691	591,980	1,472,260	1.0%	2.5%	93,461,967	952,583	2,369,083	1.0%	2.5%	5.00%	1.6091
	2004	36,451	55,102,185	1,048,390	4,534,800	1.9%	8.2%	84,445,243	1,606,680	6,949,676	1.9%	8.2%	5.00%	1.5325
	2005	35,453	53,280,360	1,902,407	6,585,885	3.6%	12.4%	77,765,007	2,776,645	9,612,387	3.6%	12.4%	5.00%	1.4595
	2006	34,704	51,930,869	3,112,631	6,028,979	6.0%	11.6%	72,186,063	4,326,686	8,380,531	6.0%	11.6%	5.00%	1.3900
	2007	34,073	50,926,950	4,698,723	11,750,005	9.2%	23.1%	67,419,595	6,220,400	15,555,233	9.2%	23.1%	5.00%	1.3238
	2008	33,150	52,947,252	6,848,733	9,067,876	12.9%	17.1%	66,756,351	8,634,942	11,432,857	12.9%	17.1%	5.00%	1.2608
	2009	32,433	52,314,127	8,907,559	15,602,982	17.0%	29.8%	62,817,241	10,695,931	18,735,594	17.0%	29.8%	5.00%	1.2008
	2010	31,770	51,078,462	12,070,257	13,748,182	23.6%	26.9%	58,412,849	13,803,433	15,722,291	23.6%	26.9%	5.00%	1.1436
	2011	31,155	49,861,552	15,522,996	19,026,800	31.1%	38.2%	54,305,907	16,906,621	20,722,732	31.1%	38.2%	5.00%	1.0891
	2012	30,489	50,194,429	18,870,174	20,918,626	37.6%	41.7%	52,065,194	19,573,473	21,698,271	37.6%	41.7%	5.00%	1.0373
1/2013-3/2013	30,369	12,912,371	3,909,329	5,332,522	30.3%	41.3%	12,991,361	3,933,244	5,365,143	30.3%	41.3%	5.00%	1.0061	
Projected Future Experience	4/2013-12/2013	29,797	38,562,053	16,582,612	17,712,219	43.0%	45.9%	37,862,925	16,281,970	17,391,097	43.0%	45.9%	5.00%	0.9819
	2014	29,034	50,018,292	19,677,241	25,677,381	39.3%	51.3%	47,058,950	18,513,033	24,158,174	39.3%	51.3%	5.00%	0.9408
	2015	28,250	48,390,671	23,647,787	28,129,057	48.9%	58.1%	43,359,645	21,189,201	25,204,567	48.9%	58.1%	5.00%	0.8960
	2016	27,433	46,723,639	27,665,482	30,747,296	59.2%	65.8%	39,872,314	23,608,751	26,238,663	59.2%	65.8%	5.00%	0.8534
	2017	26,579	45,008,117	31,277,994	33,752,786	69.5%	75.0%	36,579,379	25,420,517	27,431,850	69.5%	75.0%	5.00%	0.8127
	2018	25,690	43,245,935	34,254,446	36,941,434	79.2%	85.4%	33,473,527	26,513,871	28,593,672	79.2%	85.4%	5.00%	0.7740
	2019	24,767	41,448,224	37,396,980	40,459,711	90.2%	97.6%	30,554,333	27,567,868	29,825,632	90.2%	97.6%	5.00%	0.7372
	2020	23,809	39,614,822	40,597,256	44,534,472	102.5%	112.4%	27,812,196	28,501,929	31,266,113	102.5%	112.4%	5.00%	0.7021
	2021	22,819	37,744,958	44,215,599	48,943,840	117.1%	129.7%	25,237,552	29,564,041	32,725,503	117.1%	129.7%	5.00%	0.6686
	2022	21,799	35,845,251	48,212,861	53,422,471	134.5%	149.0%	22,826,042	30,701,662	34,019,111	134.5%	149.0%	5.00%	0.6368
	2023	20,750	33,923,914	52,503,015	58,068,035	154.8%	171.2%	20,573,853	31,841,530	35,216,550	154.8%	171.2%	5.00%	0.6065
	2024	19,660	31,974,184	57,043,616	62,733,645	178.4%	196.2%	18,468,000	32,947,877	36,234,386	178.4%	196.2%	5.00%	0.5776
	2025	18,528	29,987,213	61,767,783	67,223,291	206.0%	224.2%	16,495,565	33,977,632	36,978,633	206.0%	224.2%	5.00%	0.5501
	2026	17,368	27,974,817	66,637,058	71,756,388	238.2%	256.5%	14,655,783	34,910,623	37,592,599	238.2%	256.5%	5.00%	0.5239
	2027	16,201	25,968,971	71,596,511	76,138,351	275.7%	293.2%	12,957,083	35,722,706	37,988,833	275.7%	293.2%	5.00%	0.4989
	2028	15,027	23,985,944	76,532,490	80,529,406	319.1%	335.7%	11,397,773	36,367,130	38,266,407	319.1%	335.7%	5.00%	0.4752
	2029	13,849	22,026,301	81,464,837	85,061,230	369.9%	386.2%	9,968,171	36,867,533	38,495,108	369.9%	386.2%	5.00%	0.4526
	2030	12,677	20,095,831	86,368,203	89,176,998	429.8%	443.8%	8,661,449	37,225,323	38,435,934	429.8%	443.8%	5.00%	0.4310
	2031	11,525	18,214,773	91,034,484	92,291,932	499.8%	506.7%	7,476,857	37,368,118	37,884,279	499.8%	506.7%	5.00%	0.4105
	2032	10,399	16,394,492	95,083,310	93,749,692	580.0%	571.8%	6,409,202	37,171,517	36,650,157	580.0%	571.8%	5.00%	0.3909
	2033	9,314	14,648,965	98,180,271	93,860,967	670.2%	640.7%	5,454,107	36,554,506	34,946,342	670.2%	640.7%	5.00%	0.3723
	2034	8,282	12,995,788	100,195,967	93,189,247	771.0%	717.1%	4,608,186	35,528,562	33,044,045	771.0%	717.1%	5.00%	0.3546
	2035	7,307	11,446,088	101,232,599	92,055,510	884.4%	804.3%	3,865,407	34,186,803	31,087,649	884.4%	804.3%	5.00%	0.3377
	2036	6,393	10,001,407	101,369,508	89,898,680	1013.6%	898.9%	3,216,695	32,602,893	28,913,596	1013.6%	898.9%	5.00%	0.3216
	2037	5,548	8,667,074	100,522,983	86,479,683	1159.8%	997.8%	2,654,801	30,791,076	26,489,490	1159.8%	997.8%	5.00%	0.3063
	2038	4,779	7,454,297	98,608,799	82,102,901	1322.8%	1101.4%	2,174,587	28,766,423	23,951,279	1322.8%	1101.4%	5.00%	0.2917
	2039	4,086	6,364,529	95,703,598	77,231,656	1503.7%	1213.5%	1,768,264	26,589,439	21,457,358	1503.7%	1213.5%	5.00%	0.2778
	2040	3,467	5,393,568	91,938,787	71,931,446	1704.6%	1333.7%	1,427,144	24,327,102	19,033,138	1704.6%	1333.7%	5.00%	0.2646
	2041	2,918	4,535,573	87,440,264	66,321,994	1927.9%	1462.3%	1,142,969	22,035,036	16,713,210	1927.9%	1462.3%	5.00%	0.2520
	2042	2,436	3,783,853	82,346,551	60,532,594	2176.3%	1599.8%	908,128	19,763,252	14,527,881	2176.3%	1599.8%	5.00%	0.2400
	2043	2,016	3,131,023	76,801,250	54,688,816	2452.9%	1746.7%	715,665	17,554,643	12,500,351	2452.9%	1746.7%	5.00%	0.2286
	2044	1,654	2,569,192	70,953,187	48,910,757	2761.7%	1903.7%	559,282	15,445,654	10,647,283	2761.7%	1903.7%	5.00%	0.2177
	2045	1,346	2,090,141	64,936,467	43,291,462	3106.8%	2071.2%	433,332	13,462,749	8,975,267	3106.8%	2071.2%	5.00%	0.2073
	2046	1,084	1,685,505	58,873,204	37,922,650	3492.9%	2249.9%	332,802	11,624,479	7,487,804	3492.9%	2249.9%	5.00%	0.1974
2047	866	1,346,967	52,875,850	32,870,641	3925.5%	2440.3%	253,293	9,943,147	6,181,227	3925.5%	2440.3%	5.00%	0.1880	
2048	684	1,066,452	47,042,725	28,186,091	4411.1%	2643.0%	190,993	8,424,995	5,047,915	4411.1%	2643.0%	5.00%	0.1791	
2049	536	836,276	41,458,989	23,904,689	4957.6%	2858.5%	142,639	7,071,420	4,077,284	4957.6%	2858.5%	5.00%	0.1706	
2050	415	649,276	36,189,966	20,040,449	5573.9%	3086.6%	105,470	5,878,774	3,255,413	5573.9%	3086.6%	5.00%	0.1624	
2051	318	498,894	31,284,171	16,599,679	6270.7%	3327.3%	77,182	4,839,873	2,568,083	6270.7%	3327.3%	5.00%	0.1547	
2052	241	379,223	26,775,525	13,579,509	7060.6%	3580.9%	55,875	3,945,100	2,000,802	7060.6%	3580.9%	5.00%	0.1473	
2053	180	285,024	22,684,138	10,964,376	7958.7%	3846.8%	39,996	3,183,120	1,538,561	7958.7%	3846.8%	5.00%	0.1403	
2054	133	211,713	19,018,077	8,735,338	8982.9%	4126.0%	28,294	2,541,605	1,167,404	8982.9%	4126.0%	5.00%	0.1336	
2055	97	155,331	15,774,541	6,863,161	10155.4%	4418.4%	19,770	2,007,746	873,527	10155.4%	4418.4%	5.00%	0.1273	
2056	70	112,503	12,941,101	5,314,990	11502.9%	4724.3%	13,637	1,568,679	644,266	11502.9%	4724.3%	5.00%	0.1212	
2057	50	80,386	10,497,515	4,055,094	13058.8%	5044.5%	9,280	1,211,881	468,139	13058.8%	5044.5%	5.00%	0.1154	
2058	35	56,624	8,417,443	3,046,071	14865.5%	5379.5%	6,226	925,474	334,907	14865.5%	5379.5%	5.00%	0.1099	
2059	24	39,285	6,669,562	2,249,755	16977.4%	5726.7%	4,114	698,381	235,575	16977.4%	5726.7%	5.00%	0.1047	
2060	16	26,814	5,219,954	1,631,555	19467.0%	6084.6%	2,674	520,562	162,707	19467.0%	6084.6%	5.00%	0.0997	
2061	11	17,979	4,033,369	1,159,192	22433.5%	6447.4%	1,708	383,075	110,096	22433.5%	6447.4%	5.00%	0.0950	
2062	7	11,819	3,074,908	804,966	26015.7%	6810.5%	1,069	278,137	72,812	26015.7%	6810.5%	5.00%	0.0905	
Past			617,028,171	77,651,536	116,324,632	12.6%	18.9%	837						

**EXHIBIT VIII**  
**RiverSource Life Insurance Company**  
**Nationwide Experience Projections with 10% Increase**  
**Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis**  
**Policy Form: 30160A, Subject to Endorsement Form 32100**

	Calendar Year	Ending Policies Inforce	Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest					Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
			Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio		
Historical Experience	2000	9,837	3,318,006	0	0	0.0%	0.0%	6,180,744	0	0	0.0%	0.0%	5.00%	1.8628
	2001	25,544	26,856,424	22,638	521,781	0.1%	1.9%	47,645,561	40,162	925,684	0.1%	1.9%	5.00%	1.7741
	2002	39,114	48,223,494	145,719	1,733,934	0.3%	3.6%	81,478,614	246,207	2,929,661	0.3%	3.6%	5.00%	1.6896
	2003	37,807	58,081,691	591,980	1,472,260	1.0%	2.5%	93,461,967	952,583	2,369,083	1.0%	2.5%	5.00%	1.6091
	2004	36,451	55,102,185	1,048,390	4,534,800	1.9%	8.2%	84,445,243	1,606,680	6,949,676	1.9%	8.2%	5.00%	1.5325
	2005	35,453	53,280,360	1,902,407	6,585,885	3.6%	12.4%	77,765,007	2,776,645	9,612,387	3.6%	12.4%	5.00%	1.4595
	2006	34,704	51,930,869	3,112,631	6,028,979	6.0%	11.6%	72,186,063	4,326,686	8,380,531	6.0%	11.6%	5.00%	1.3900
	2007	34,073	50,926,950	4,698,723	11,750,005	9.2%	23.1%	67,419,595	6,220,400	15,555,233	9.2%	23.1%	5.00%	1.3238
	2008	33,150	52,947,252	6,848,733	9,067,876	12.9%	17.1%	66,756,351	8,634,942	11,432,857	12.9%	17.1%	5.00%	1.2608
	2009	32,433	52,314,127	8,907,559	15,602,982	17.0%	29.8%	62,817,241	10,695,931	18,735,594	17.0%	29.8%	5.00%	1.2008
	2010	31,770	51,078,462	12,070,257	13,748,182	23.6%	26.9%	58,412,849	13,803,433	15,722,291	23.6%	26.9%	5.00%	1.1436
	2011	31,155	49,861,552	15,522,996	19,026,800	31.1%	38.2%	54,305,907	16,906,621	20,722,732	31.1%	38.2%	5.00%	1.0891
	2012	30,489	50,194,429	18,870,174	20,918,626	37.6%	41.7%	52,065,194	19,573,473	21,698,271	37.6%	41.7%	5.00%	1.0373
1/2013-3/2013	30,369	12,912,371	3,909,329	5,332,522	30.3%	41.3%	12,991,361	3,933,244	5,365,143	30.3%	41.3%	5.00%	1.0061	
Projected Future Experience	4/2013-12/2013	29,797	38,562,053	16,582,612	17,712,219	43.0%	45.9%	37,862,925	16,281,970	17,391,097	43.0%	45.9%	5.00%	0.9819
	2014	29,034	52,486,729	19,681,983	25,735,749	37.5%	49.0%	49,381,342	18,517,495	24,213,089	37.5%	49.0%	5.00%	0.9408
	2015	28,250	53,229,738	23,679,305	28,236,802	44.5%	53.0%	47,695,609	21,217,442	25,301,110	44.5%	53.0%	5.00%	0.8960
	2016	27,433	51,396,003	27,726,206	30,856,949	53.9%	60.0%	43,859,545	23,660,571	26,332,238	53.9%	60.0%	5.00%	0.8534
	2017	26,579	49,508,929	31,361,044	33,864,539	63.3%	68.4%	40,237,317	25,488,014	27,522,676	63.3%	68.4%	5.00%	0.8127
	2018	25,690	47,570,528	34,354,035	37,054,966	72.2%	77.9%	36,820,879	26,590,955	28,681,549	72.2%	77.9%	5.00%	0.7740
	2019	24,767	45,593,047	37,506,451	40,575,112	82.3%	89.0%	33,609,766	27,648,582	29,910,702	82.3%	89.0%	5.00%	0.7372
	2020	23,809	43,576,304	40,713,770	44,652,053	93.4%	102.5%	30,593,416	28,583,730	31,348,662	93.4%	102.5%	5.00%	0.7021
	2021	22,819	41,519,454	44,336,813	49,063,511	106.8%	118.2%	27,761,307	29,645,089	32,805,519	106.8%	118.2%	5.00%	0.6686
	2022	21,799	39,429,776	48,337,929	53,543,713	122.6%	135.8%	25,108,646	30,781,305	34,096,317	122.6%	135.8%	5.00%	0.6368
	2023	20,750	37,316,306	52,631,334	58,190,560	141.0%	155.9%	22,631,239	31,919,352	35,290,858	141.0%	155.9%	5.00%	0.6065
	2024	19,660	35,171,603	57,174,615	62,856,903	162.6%	178.7%	20,314,800	33,023,541	36,305,579	162.6%	178.7%	5.00%	0.5776
	2025	18,528	32,985,934	61,900,789	67,346,486	187.7%	204.2%	18,145,121	34,500,796	37,046,401	187.7%	204.2%	5.00%	0.5501
	2026	17,368	30,772,298	66,771,323	71,879,096	217.0%	233.6%	16,121,362	34,980,964	37,656,885	217.0%	233.6%	5.00%	0.5239
	2027	16,201	28,565,869	71,731,334	76,259,961	251.1%	267.0%	14,252,791	35,789,975	38,049,510	251.1%	267.0%	5.00%	0.4989
	2028	15,027	26,384,538	76,667,262	80,649,629	290.6%	305.7%	12,537,550	36,431,172	38,323,535	290.6%	305.7%	5.00%	0.4752
	2029	13,849	24,228,931	81,599,086	85,180,045	336.8%	351.6%	10,964,988	36,928,289	38,548,879	336.8%	351.6%	5.00%	0.4526
	2030	12,677	22,105,414	86,501,550	89,293,951	391.3%	403.9%	9,527,594	37,282,796	38,486,342	391.3%	403.9%	5.00%	0.4310
	2031	11,525	20,036,250	91,166,431	92,405,851	455.0%	461.2%	8,224,542	37,422,280	37,931,041	455.0%	461.2%	5.00%	0.4105
	2032	10,399	18,033,941	95,213,010	93,858,699	528.0%	520.5%	7,050,122	37,222,221	36,692,772	528.0%	520.5%	5.00%	0.3909
	2033	9,314	16,113,861	98,306,578	93,963,776	610.1%	583.1%	5,999,517	36,601,533	34,984,620	610.1%	583.1%	5.00%	0.3723
	2034	8,282	14,295,367	100,317,717	93,285,411	701.7%	652.6%	5,069,005	35,571,734	33,078,143	701.7%	652.6%	5.00%	0.3546
	2035	7,307	12,590,697	101,348,886	92,145,065	805.0%	731.9%	4,251,947	34,226,073	31,117,892	805.0%	731.9%	5.00%	0.3377
	2036	6,393	11,001,547	101,479,666	89,981,186	922.4%	817.9%	3,538,365	32,638,322	28,940,132	922.4%	817.9%	5.00%	0.3216
	2037	5,548	9,533,781	100,626,411	86,554,600	1055.5%	907.9%	2,920,281	30,822,757	26,512,437	1055.5%	907.9%	5.00%	0.3063
	2038	4,779	8,199,727	98,704,952	82,170,063	1203.8%	1002.1%	2,392,046	28,794,474	23,970,871	1203.8%	1002.1%	5.00%	0.2917
	2039	4,086	7,000,982	95,792,099	77,291,317	1368.3%	1104.0%	1,945,091	26,614,027	21,473,934	1368.3%	1104.0%	5.00%	0.2778
	2040	3,467	5,932,924	92,019,458	71,983,933	1551.0%	1213.3%	1,569,858	24,348,447	19,047,026	1551.0%	1213.3%	5.00%	0.2646
	2041	2,918	4,989,131	87,513,093	66,367,713	1754.1%	1330.2%	1,257,266	22,053,389	16,724,732	1754.1%	1330.2%	5.00%	0.2520
	2042	2,436	4,162,238	82,411,679	60,572,025	1980.0%	1455.3%	998,941	19,778,883	14,537,345	1980.0%	1455.3%	5.00%	0.2400
	2043	2,016	3,444,125	76,858,944	54,722,484	2231.6%	1588.9%	787,232	17,567,830	12,508,047	2231.6%	1588.9%	5.00%	0.2286
	2044	1,654	2,826,111	71,003,829	48,939,218	2512.4%	1731.7%	615,210	15,456,679	10,653,478	2512.4%	1731.7%	5.00%	0.2177
	2045	1,346	2,299,158	64,980,514	43,315,278	2826.3%	1884.0%	476,665	13,471,881	8,980,204	2826.3%	1884.0%	5.00%	0.2073
	2046	1,084	1,854,055	58,911,167	37,942,378	3177.4%	2046.5%	366,082	11,631,974	7,491,699	3177.4%	2046.5%	5.00%	0.1974
2047	866	1,481,664	52,908,271	32,886,815	3570.9%	2219.6%	278,623	9,949,244	6,184,268	3570.9%	2219.6%	5.00%	0.1880	
2048	684	1,173,097	47,070,162	28,199,213	4012.5%	2403.8%	210,093	8,429,909	5,050,265	4012.5%	2403.8%	5.00%	0.1791	
2049	536	919,903	41,481,997	23,915,222	4509.4%	2599.8%	156,903	7,075,344	4,079,081	4509.4%	2599.8%	5.00%	0.1706	
2050	415	714,204	36,209,084	20,048,809	5069.9%	2807.2%	116,017	5,881,880	3,256,771	5069.9%	2807.2%	5.00%	0.1624	
2051	318	548,784	31,299,909	16,606,238	5703.5%	3026.0%	84,901	4,842,308	2,569,097	5703.5%	3026.0%	5.00%	0.1547	
2052	241	417,146	26,788,359	13,584,593	6421.8%	3256.6%	61,462	3,946,991	2,001,551	6421.8%	3256.6%	5.00%	0.1473	
2053	180	313,527	22,694,503	10,968,268	7238.5%	3498.4%	43,995	3,184,574	1,539,107	7238.5%	3498.4%	5.00%	0.1403	
2054	133	232,884	19,026,366	8,738,278	8169.9%	3752.2%	31,123	2,542,712	1,167,797	8169.9%	3752.2%	5.00%	0.1336	
2055	97	170,864	15,781,102	6,865,353	9236.0%	4018.0%	21,747	2,008,581	873,806	9236.0%	4018.0%	5.00%	0.1273	
2056	70	123,753	12,946,242	5,316,601	10461.4%	4296.1%	15,001	1,569,302	644,461	10461.4%	4296.1%	5.00%	0.1212	
2057	50	88,425	10,501,500	4,056,262	11876.2%	4587.2%	10,208	1,212,341	468,273	11876.2%	4587.2%	5.00%	0.1154	
2058	35	62,286	8,420,498	3,046,905	13519.0%	4891.8%	6,848	925,810	334,999	13519.0%	4891.8%	5.00%	0.1099	
2059	24	43,214	6,671,879	2,250,340	15439.3%	5207.5%	4,525	698,623	235,637	15439.3%	5207.5%	5.00%	0.1047	
2060	16	29,496	5,221,691	1,631,959	17703.2%	5532.9%	2,941	520,735	162,748	17703.2%	5532.9%	5.00%	0.0997	
2061	11	19,777	4,034,655	1,159,466	20400.6%	5862.7%	1,878	383,198	110,122	20400.6%	5862.7%	5.00%	0.0950	
2062	7	13,001	3,075,849	805,147	23657.9%	6192.8%	1,176	278,222	72,829	23657.9%	6192.8%	5.00%	0.0905	
Past			617,028,171	77,651,536	116,324,632	12.6%	18.9%	837,931,697	89,717,006	140,399,143	10.7%	16.8%		
Future			849,069,370	2,640,043,946	2,318,530,709	310.9%	273.1%	545,935,809	1,006,494,317	970,706,134	184.4%	177.8%		
Lifetime			1,466,097,542	2,717,695,482	2,434,855,340	185.4%	166.1%	1,383,867,506	1,096,211,323	1,111,105,276	79.2%	80.3%		

**EXHIBIT IX**  
**RiverSource Life Insurance Company**  
**Virginia Experience Projections with No Increase**  
**Policy Form: 30160A-V, Subject to Endorsement Form 32100**

	Calendar Year	Ending Policies Inforce	Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest					Calendar Year	Mid-Year
			Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Effective Int Rate	Disc / Accum Factor
Historical Experience	2000	510	155,746	0	0	0.0%	0.0%	290,122	0	0	0.0%	0.0%	5.00%	1.8628
	2001	1,213	1,237,228	0	0	0.0%	0.0%	2,194,947	0	0	0.0%	0.0%	5.00%	1.7741
	2002	1,908	2,248,858	1,125	193,326	0.1%	8.6%	3,799,680	1,900	326,644	0.1%	8.6%	5.00%	1.6896
	2003	1,881	2,805,151	48,854	0	1.7%	0.0%	4,513,900	78,614	0	1.7%	0.0%	5.00%	1.6091
	2004	1,839	2,693,828	98,428	334,456	3.7%	12.4%	4,128,347	150,844	512,561	3.7%	12.4%	5.00%	1.5325
	2005	1,810	2,640,938	148,578	791,847	5.6%	30.0%	3,854,565	216,856	1,155,735	5.6%	30.0%	5.00%	1.4595
	2006	1,793	2,599,868	161,913	18,125	6.2%	0.7%	3,613,924	225,066	25,194	6.2%	0.7%	5.00%	1.3900
	2007	1,762	2,583,845	316,816	508,120	12.3%	19.7%	3,420,620	419,417	672,674	12.3%	19.7%	5.00%	1.3238
	2008	1,731	2,684,905	367,590	400,756	13.7%	14.9%	3,385,151	463,460	505,276	13.7%	14.9%	5.00%	1.2608
	2009	1,709	2,686,483	511,612	631,038	19.0%	23.5%	3,225,848	614,328	757,732	19.0%	23.5%	5.00%	1.2008
	2010	1,690	2,644,682	602,590	99,584	22.8%	3.8%	3,024,433	689,116	113,883	22.8%	3.8%	5.00%	1.1436
	2011	1,671	2,609,891	554,233	327,450	21.2%	12.5%	2,842,521	603,634	356,637	21.2%	12.5%	5.00%	1.0891
	2012	1,654	2,652,307	396,403	693,921	14.9%	26.2%	2,751,159	411,177	719,783	14.9%	26.2%	5.00%	1.0373
	1/2013-3/2013	1,647	685,444	81,316	273,905	11.9%	40.0%	689,637	81,814	275,581	11.9%	40.0%	5.00%	1.0061
Projected Future Experience	4/2013-12/2013	1,620	2,068,005	964,048	771,564	46.6%	37.3%	2,030,512	946,570	757,575	46.6%	37.3%	5.00%	0.9819
	2014	1,584	2,695,435	776,369	1,137,512	28.8%	42.2%	2,535,959	730,435	1,070,211	28.8%	42.2%	5.00%	0.9408
	2015	1,546	2,623,076	952,314	1,272,142	36.3%	48.5%	2,350,363	853,305	1,139,882	36.3%	48.5%	5.00%	0.8960
	2016	1,507	2,548,163	1,163,205	1,413,690	45.6%	55.5%	2,174,513	992,638	1,206,394	45.6%	55.5%	5.00%	0.8534
	2017	1,465	2,470,063	1,358,605	1,582,539	55.0%	64.1%	2,007,491	1,104,177	1,286,174	55.0%	64.1%	5.00%	0.8127
	2018	1,422	2,388,659	1,533,825	1,768,125	64.2%	74.0%	1,848,887	1,187,222	1,368,576	64.2%	74.0%	5.00%	0.7740
	2019	1,376	2,304,314	1,719,787	1,975,335	74.6%	85.7%	1,698,668	1,267,773	1,456,155	74.6%	85.7%	5.00%	0.7372
	2020	1,328	2,216,844	1,910,395	2,218,384	86.2%	100.1%	1,556,370	1,341,222	1,557,451	86.2%	100.1%	5.00%	0.7021
	2021	1,278	2,126,260	2,129,388	2,488,726	100.1%	117.0%	1,421,689	1,423,781	1,664,046	100.1%	117.0%	5.00%	0.6686
	2022	1,227	2,032,808	2,374,823	2,767,883	116.8%	136.2%	1,294,480	1,512,273	1,762,571	116.8%	136.2%	5.00%	0.6368
	2023	1,173	1,936,680	2,640,652	3,054,317	136.3%	157.7%	1,174,539	1,601,478	1,852,353	136.3%	157.7%	5.00%	0.6065
	2024	1,116	1,837,303	2,926,371	3,352,374	159.3%	182.5%	1,061,209	1,690,246	1,936,301	159.3%	182.5%	5.00%	0.5776
	2025	1,056	1,734,167	3,224,963	3,644,267	186.0%	210.1%	953,942	1,774,009	2,004,662	186.0%	210.1%	5.00%	0.5501
	2026	994	1,627,900	3,532,956	3,945,946	217.0%	242.4%	852,844	1,850,888	2,067,250	217.0%	242.4%	5.00%	0.5239
	2027	932	1,520,333	3,853,089	4,239,482	253.4%	278.9%	758,562	1,922,479	2,115,268	253.4%	278.9%	5.00%	0.4989
	2028	868	1,412,458	4,177,585	4,542,292	295.8%	321.6%	671,179	1,985,128	2,158,431	295.8%	321.6%	5.00%	0.4752
	2029	803	1,304,367	4,507,608	4,850,308	345.6%	371.9%	590,301	2,039,952	2,195,044	345.6%	371.9%	5.00%	0.4526
	2030	738	1,196,572	4,839,243	5,141,962	404.4%	429.7%	515,731	2,085,749	2,216,223	404.4%	429.7%	5.00%	0.4310
	2031	674	1,090,289	5,163,967	5,383,171	473.6%	493.7%	447,545	2,119,721	2,209,701	473.6%	493.7%	5.00%	0.4105
	2032	610	986,216	5,457,981	5,521,242	553.4%	559.8%	385,548	2,133,723	2,158,454	553.4%	559.8%	5.00%	0.3909
	2033	548	885,327	5,697,360	5,570,632	643.5%	629.2%	329,625	2,121,243	2,074,059	643.5%	629.2%	5.00%	0.3723
	2034	489	788,793	5,873,448	5,578,605	744.6%	707.2%	279,699	2,082,670	1,978,122	744.6%	707.2%	5.00%	0.3546
	2035	433	697,405	5,991,722	5,554,313	859.1%	796.4%	235,517	2,023,437	1,875,722	859.1%	796.4%	5.00%	0.3377
	2036	380	611,474	6,053,396	5,459,249	990.0%	892.8%	196,665	1,946,919	1,755,827	990.0%	892.8%	5.00%	0.3216
	2037	330	531,438	6,051,365	5,279,690	1138.7%	993.5%	162,784	1,853,586	1,617,215	1138.7%	993.5%	5.00%	0.3063
	2038	285	458,156	5,978,756	5,036,036	1305.0%	1099.2%	133,655	1,744,139	1,469,126	1305.0%	1099.2%	5.00%	0.2917
	2039	244	391,861	5,839,743	4,755,380	1490.3%	1213.5%	108,871	1,622,462	1,321,192	1490.3%	1213.5%	5.00%	0.2778
	2040	207	332,419	5,641,616	4,441,974	1697.1%	1336.3%	87,958	1,492,778	1,175,351	1697.1%	1336.3%	5.00%	0.2646
	2041	174	279,593	5,391,225	4,101,025	1928.2%	1466.8%	70,458	1,358,594	1,033,463	1928.2%	1466.8%	5.00%	0.2520
	2042	145	233,082	5,096,233	3,742,093	2186.5%	1605.5%	55,940	1,223,101	898,106	2186.5%	1605.5%	5.00%	0.2400
	2043	120	192,529	4,765,142	3,373,406	2475.0%	1752.2%	44,007	1,089,180	771,067	2475.0%	1752.2%	5.00%	0.2286
	2044	98	157,527	4,408,072	3,005,686	2798.3%	1908.0%	34,292	959,584	654,302	2798.3%	1908.0%	5.00%	0.2177
	2045	79	127,633	4,034,244	2,645,410	3160.8%	2072.7%	26,461	836,387	548,451	3160.8%	2072.7%	5.00%	0.2073
	2046	63	102,376	3,652,165	2,299,083	3567.4%	2245.7%	20,214	721,118	453,953	3567.4%	2245.7%	5.00%	0.1974
2047	50	81,271	3,270,221	1,972,263	4023.8%	2426.8%	15,283	614,955	370,878	4023.8%	2426.8%	5.00%	0.1880	
2048	39	63,835	2,895,776	1,670,206	4536.3%	2616.4%	11,432	518,611	299,121	4536.3%	2616.4%	5.00%	0.1791	
2049	30	49,593	2,535,772	1,395,889	5113.1%	2814.7%	8,459	432,512	238,089	5113.1%	2814.7%	5.00%	0.1706	
2050	23	38,096	2,195,581	1,150,784	5763.3%	3020.8%	6,188	356,655	186,936	5763.3%	3020.8%	5.00%	0.1624	
2051	18	28,923	1,879,331	935,499	6497.6%	3234.4%	4,475	290,745	144,728	6497.6%	3234.4%	5.00%	0.1547	
2052	13	21,694	1,589,986	749,264	7329.3%	3453.8%	3,196	234,268	110,396	7329.3%	3453.8%	5.00%	0.1473	
2053	10	16,067	1,329,254	591,159	8273.4%	3679.4%	2,255	186,526	82,954	8273.4%	3679.4%	5.00%	0.1403	
2054	7	11,744	1,097,960	459,377	9349.3%	3911.7%	1,569	146,733	61,392	9349.3%	3911.7%	5.00%	0.1336	
2055	5	8,467	895,895	351,417	10580.4%	4150.2%	1,078	114,027	44,728	10580.4%	4150.2%	5.00%	0.1273	
2056	4	6,019	722,005	264,408	11994.7%	4392.6%	730	87,519	32,051	11994.7%	4392.6%	5.00%	0.1212	
2057	2	4,217	574,563	195,677	13626.3%	4640.7%	487	66,330	22,590	13626.3%	4640.7%	5.00%	0.1154	
2058	2	2,909	451,419	142,261	15517.6%	4890.3%	320	49,632	15,641	15517.6%	4890.3%	5.00%	0.1099	
2059	1	1,976	350,054	101,546	17719.5%	5140.2%	207	36,655	10,633	17719.5%	5140.2%	5.00%	0.1047	
2060	1	1,320	267,849	71,071	20297.7%	5385.8%	132	26,711	7,088	20297.7%	5385.8%	5.00%	0.0997	
2061	0	866	202,171	48,764	23339.6%	5629.6%	82	19,201	4,631	23339.6%	5629.6%	5.00%	0.0950	
2062	0	558	150,484	32,755	26967.4%	5869.9%	50	13,612	2,963	26967.4%	5869.9%	5.00%	0.0905	
Past			30,929,174	3,289,458	4,272,528	10.6%	13.8%	41,734,856	3,956,226	5,421,701	9.5%	13.0%		
Future			44,247,077	150,089,983	132,046,182	339.2%	298.4%	28,172,420	54,832,660	53,443,496	194.6%	189.7%		
Lifetime			75,176,251	153,379,441	136,318,710	204.0%	181.3%	69,907,276	58,788,886	58,865,197	84.1%	84.2%		

**EXHIBIT IX**  
**RiverSource Life Insurance Company**  
**Virginia Experience Projections with 10% Increase**  
**Policy Form: 30160A-VA, Subject to Endorsement Form 32100**

	Calendar Year	Ending Policies Inforce	Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest					Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
			Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio		
Historical Experience	2000	510	155,746	0	0	0.0%	0.0%	290,122	0	0	0.0%	0.0%	5.00%	1.8628
	2001	1,213	1,237,228	0	0	0.0%	0.0%	2,194,947	0	0	0.0%	0.0%	5.00%	1.7741
	2002	1,908	2,248,858	1,125	193,326	0.1%	8.6%	3,799,680	1,900	326,644	0.1%	8.6%	5.00%	1.6896
	2003	1,881	2,805,151	48,854	0	1.7%	0.0%	4,513,900	78,614	0	1.7%	0.0%	5.00%	1.6091
	2004	1,839	2,693,828	98,428	334,456	3.7%	12.4%	4,128,347	150,844	512,561	3.7%	12.4%	5.00%	1.5325
	2005	1,810	2,640,938	148,578	791,847	5.6%	30.0%	3,854,565	216,856	1,155,735	5.6%	30.0%	5.00%	1.4595
	2006	1,793	2,599,868	161,913	18,125	6.2%	0.7%	3,613,924	225,066	25,194	6.2%	0.7%	5.00%	1.3900
	2007	1,762	2,583,845	316,816	508,120	12.3%	19.7%	3,420,620	419,417	672,674	12.3%	19.7%	5.00%	1.3238
	2008	1,731	2,684,905	367,590	400,756	13.7%	14.9%	3,385,151	463,460	505,276	13.7%	14.9%	5.00%	1.2608
	2009	1,709	2,686,483	511,612	631,038	19.0%	23.5%	3,225,848	614,328	757,732	19.0%	23.5%	5.00%	1.2008
	2010	1,690	2,644,682	602,590	99,584	22.8%	3.8%	3,024,433	689,116	113,883	22.8%	3.8%	5.00%	1.1436
	2011	1,671	2,609,891	554,233	327,450	21.2%	12.5%	2,842,521	603,634	356,637	21.2%	12.5%	5.00%	1.0891
	2012	1,654	2,652,307	396,403	693,921	14.9%	26.2%	2,751,159	411,177	719,783	14.9%	26.2%	5.00%	1.0373
1/2013-3/2013	1,647	685,444	81,316	273,905	11.9%	40.0%	689,637	81,814	275,581	11.9%	40.0%	5.00%	1.0061	
Projected Future Experience	4/2013-12/2013	1,620	2,068,005	964,048	771,564	46.6%	37.3%	2,030,512	946,570	757,575	46.6%	37.3%	5.00%	0.9819
	2014	1,584	2,829,600	776,578	1,139,965	27.4%	40.3%	2,662,186	730,631	1,072,518	27.4%	40.3%	5.00%	0.9408
	2015	1,546	2,885,384	953,605	1,276,521	33.0%	44.2%	2,585,399	854,461	1,143,806	33.0%	44.2%	5.00%	0.8960
	2016	1,507	2,802,979	1,165,666	1,418,251	41.6%	50.6%	2,391,964	994,738	1,210,286	41.6%	50.6%	5.00%	0.8534
	2017	1,465	2,717,070	1,362,004	1,587,317	50.1%	58.4%	2,208,240	1,106,940	1,290,058	50.1%	58.4%	5.00%	0.8127
	2018	1,422	2,627,525	1,537,973	1,773,122	58.5%	67.5%	2,033,775	1,190,433	1,372,445	58.5%	67.5%	5.00%	0.7740
	2019	1,376	2,534,746	1,724,466	1,980,560	68.0%	78.1%	1,868,535	1,271,223	1,460,007	68.0%	78.1%	5.00%	0.7372
	2020	1,328	2,438,529	1,915,502	2,223,862	78.6%	91.2%	1,712,007	1,344,808	1,561,297	78.6%	91.2%	5.00%	0.7021
	2021	1,278	2,338,886	2,134,837	2,494,467	91.3%	106.7%	1,563,858	1,427,424	1,667,885	91.3%	106.7%	5.00%	0.6686
	2022	1,227	2,236,089	2,380,593	2,773,863	106.5%	124.0%	1,423,928	1,515,948	1,766,379	106.5%	124.0%	5.00%	0.6368
	2023	1,173	2,130,348	2,646,728	3,060,507	124.2%	143.7%	1,291,993	1,605,162	1,856,108	124.2%	143.7%	5.00%	0.6065
	2024	1,116	2,021,033	2,932,733	3,358,750	145.1%	166.2%	1,167,330	1,693,920	1,939,983	145.1%	166.2%	5.00%	0.5776
	2025	1,056	1,907,584	3,231,583	3,650,778	169.4%	191.4%	1,049,336	1,777,650	2,008,244	169.4%	191.4%	5.00%	0.5501
	2026	994	1,790,690	3,539,797	3,952,565	197.7%	220.7%	938,128	1,854,472	2,070,717	197.7%	220.7%	5.00%	0.5239
	2027	932	1,672,366	3,860,113	4,246,163	230.8%	253.9%	834,418	1,925,983	2,118,601	230.8%	253.9%	5.00%	0.4989
	2028	868	1,553,703	4,184,756	4,549,020	269.3%	292.8%	738,297	1,988,536	2,161,628	269.3%	292.8%	5.00%	0.4752
	2029	803	1,434,803	4,514,895	4,857,063	314.7%	338.5%	649,331	2,043,250	2,198,101	314.7%	338.5%	5.00%	0.4526
	2030	738	1,316,230	4,846,617	5,148,713	368.2%	391.2%	567,305	2,088,927	2,219,133	368.2%	391.2%	5.00%	0.4310
	2031	674	1,199,318	5,171,392	5,389,845	431.2%	449.4%	492,300	2,122,769	2,212,441	431.2%	449.4%	5.00%	0.4105
	2032	610	1,084,838	5,465,399	5,527,712	503.8%	509.5%	424,103	2,136,623	2,160,983	503.8%	509.5%	5.00%	0.3909
	2033	548	973,860	5,704,692	5,576,798	585.8%	572.6%	362,588	2,123,973	2,076,355	585.8%	572.6%	5.00%	0.3723
	2034	489	867,673	5,880,611	5,584,436	677.7%	643.6%	307,669	2,085,210	1,980,189	677.7%	643.6%	5.00%	0.3546
	2035	433	767,146	5,998,650	5,559,797	781.9%	724.7%	259,069	2,025,777	1,877,574	781.9%	724.7%	5.00%	0.3377
	2036	380	672,621	6,060,035	5,464,347	901.0%	812.4%	216,331	1,949,054	1,757,466	901.0%	812.4%	5.00%	0.3216
	2037	330	584,582	6,057,664	5,284,354	1036.2%	904.0%	179,063	1,855,516	1,618,644	1036.2%	904.0%	5.00%	0.3063
	2038	285	503,972	5,984,668	5,040,246	1187.5%	1000.1%	147,020	1,745,863	1,470,354	1187.5%	1000.1%	5.00%	0.2917
	2039	244	431,047	5,845,230	4,759,142	1356.1%	1104.1%	119,758	1,623,987	1,322,238	1356.1%	1104.1%	5.00%	0.2778
	2040	207	365,660	5,646,657	4,445,302	1544.2%	1215.7%	96,754	1,494,111	1,176,232	1544.2%	1215.7%	5.00%	0.2646
	2041	174	307,552	5,395,807	4,103,936	1754.4%	1334.4%	77,503	1,359,749	1,034,196	1754.4%	1334.4%	5.00%	0.2520
	2042	145	256,390	5,100,355	3,744,610	1989.3%	1460.5%	61,534	1,224,090	898,710	1989.3%	1460.5%	5.00%	0.2400
	2043	120	211,782	4,768,812	3,375,558	2251.8%	1593.9%	48,407	1,090,019	771,559	2251.8%	1593.9%	5.00%	0.2286
	2044	98	173,280	4,411,306	3,007,504	2545.8%	1735.6%	37,721	960,288	654,697	2545.8%	1735.6%	5.00%	0.2177
	2045	79	140,396	4,037,064	2,646,928	2875.5%	1885.3%	29,107	836,972	548,766	2875.5%	1885.3%	5.00%	0.2073
	2046	63	112,613	3,654,600	2,300,336	3245.3%	2042.7%	22,235	721,599	454,200	3245.3%	2042.7%	5.00%	0.1974
2047	50	89,399	3,272,301	1,973,283	3660.3%	2207.3%	16,811	615,346	371,070	3660.3%	2207.3%	5.00%	0.1880	
2048	39	70,219	2,897,534	1,671,028	4126.5%	2379.8%	12,576	518,926	299,268	4126.5%	2379.8%	5.00%	0.1791	
2049	30	54,553	2,537,243	1,396,543	4651.0%	2560.0%	9,305	432,763	238,200	4651.0%	2560.0%	5.00%	0.1706	
2050	23	41,906	2,196,799	1,151,297	5242.3%	2747.4%	6,807	356,853	187,019	5242.3%	2747.4%	5.00%	0.1624	
2051	18	31,816	1,880,328	935,897	5910.1%	2941.6%	4,922	290,899	144,790	5910.1%	2941.6%	5.00%	0.1547	
2052	13	23,863	1,590,794	749,568	6666.4%	3141.1%	3,516	234,387	110,441	6666.4%	3141.1%	5.00%	0.1473	
2053	10	17,673	1,329,902	591,387	7524.9%	3346.2%	2,480	186,617	82,986	7524.9%	3346.2%	5.00%	0.1403	
2054	7	12,918	1,098,473	459,546	8503.4%	3557.4%	1,726	146,802	61,414	8503.4%	3557.4%	5.00%	0.1336	
2055	5	9,314	896,297	351,541	9622.9%	3774.2%	1,185	114,079	44,743	9622.9%	3774.2%	5.00%	0.1273	
2056	4	6,621	722,316	264,497	10909.0%	3994.7%	803	87,557	32,062	10909.0%	3994.7%	5.00%	0.1212	
2057	2	4,638	574,802	195,740	12392.7%	4220.2%	535	66,358	22,597	12392.7%	4220.2%	5.00%	0.1154	
2058	2	3,200	451,600	142,306	14112.6%	4447.1%	352	49,652	15,646	14112.6%	4447.1%	5.00%	0.1099	
2059	1	2,173	350,189	101,576	16114.9%	4674.3%	228	36,669	10,636	16114.9%	4674.3%	5.00%	0.1047	
2060	1	1,452	267,949	71,091	18459.3%	4897.6%	145	26,721	7,090	18459.3%	4897.6%	5.00%	0.0997	
2061	0	953	202,244	48,778	21225.5%	5119.3%	90	19,208	4,633	21225.5%	5119.3%	5.00%	0.0950	
2062	0	614	150,536	32,764	24524.3%	5337.7%	56	13,617	2,964	24524.3%	5337.7%	5.00%	0.0905	
Past			30,929,174	3,289,458	4,272,528	10.6%	13.8%	41,734,856	3,956,226	5,421,701	9.5%	13.0%		
Future			48,329,606	150,274,743	132,210,745	310.9%	273.6%	30,659,243	54,913,129	53,524,935	179.1%	174.6%		
Lifetime			79,258,780	153,564,201	136,483,272	193.8%	172.2%	72,394,098	58,869,355	58,946,635	81.3%	81.4%		

**EXHIBIT X**  
**RiverSource Life Insurance Company**  
**Incurred Loss Ratio Including the Change in Active Life Reserves**  
**Nationwide Experience, without Interest**  
**Policy Form: 30160A, Subject to Endorsement Form 32100**

Calendar Year	(a) Earned Premiums <sup>1</sup>	(b) Incurred Claims	(c) Change in Active Life Reserves	(d) = (b+c)/(a) Loss Ratio
2000	3,318,006	0	5,107,758	153.9%
2001	26,856,424	521,781	8,405,957	33.2%
2002	48,223,494	1,733,934	30,347,643	66.5%
2003	58,081,691	1,472,260	46,913,547	83.3%
2004	55,102,185	4,534,800	57,452,858	112.5%
2005	53,280,360	6,585,885	56,283,231	118.0%
2006	51,930,869	6,028,979	55,810,732	119.1%
2007	50,926,950	11,750,005	66,244,850	153.2%
2008	52,947,252	9,067,876	54,059,116	119.2%
2009	52,314,127	15,602,982	55,652,769	136.2%
2010	51,078,462	13,748,182	56,832,582	138.2%
2011	49,861,552	19,026,800	(38,302,524)	-38.7%
2012	50,194,429	20,918,626	45,838,077	133.0%
1/2013-3/2013	12,912,371	5,332,522	8,456,395	106.8%
Total	617,028,171	116,324,632	509,102,992	101.4%

<sup>1</sup> Premiums reflect the accumulated 21% rate increases as approved in Virginia and implemented from 2007 through 2013 on a nationwide basis.

**EXHIBIT XI**  
**RiverSource Life Insurance Company**  
**Incurred Loss Ratio Including the Change in Active Life Reserves**  
**Virginia Experience, without Interest**  
**Policy Form: 30160A-VA, Subject to Endorsement Form 32100**

Calendar Year	(a) Earned Premiums	(b) Incurred Claims	(c) Change in Active Life Reserves	(d) = (b+c)/(a) Loss Ratio
2000	155,746	0	162,825	104.5%
2001	1,237,228	0	353,274	28.6%
2002	2,248,858	193,326	1,448,086	73.0%
2003	2,805,151	0	2,282,154	81.4%
2004	2,693,828	334,456	2,866,018	118.8%
2005	2,640,938	791,847	2,812,734	136.5%
2006	2,599,868	18,125	2,799,131	108.4%
2007	2,583,845	508,120	4,307,227	186.4%
2008	2,684,905	400,756	3,045,700	128.4%
2009	2,686,483	631,038	3,229,438	143.7%
2010	2,644,682	99,584	3,359,320	130.8%
2011	2,609,891	327,450	(1,992,178)	-63.8%
2012	2,652,307	693,921	2,787,698	131.3%
1/2013-3/2013	685,444	273,905	469,059	108.4%
Total	30,929,174	4,272,528	27,930,486	104.1%

**EXHIBIT XII**  
**Demonstration of Compliance with Dual-Loss Ratio Standard**  
**For Individual Long-Term Care with Prescribed Factors<sup>1</sup>**

**Nationwide Experience**  
**Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis**  
**Policy Form: 30160A, Subject to Endorsement Form 32100**

1a	Accumulated value of past earned premiums	837,931,697	x 66.4%	=	556,386,647
1b	Present value of future projected earned premiums at current level	501,914,187	x 66.4%	=	333,271,020
2	Present value of increased portion of future projected earned premiums	44,021,623	x 80.0%	=	35,217,298
<b>3</b>	<b>Lifetime Earned Premium Times Prescribed Factor: Sum of 1a, 1b and 2</b>	<b>1,383,867,506</b>			<b>924,874,965</b>
<b>4</b>	<b>Lifetime Incurred Claims with Rate Increase</b>				<b>1,111,105,276</b>
<b>5</b>	<b>Test: 4 is not less than 3</b>				<b>TRUE</b>

**Virginia Experience**  
**Using Actual History**  
**Policy Form: 30160A-VA, Subject to Endorsement Form 32100**

1a	Accumulated value of past earned premiums	41,734,856	x 66.4%	=	27,711,944
1b	Present value of future projected earned premiums at current level	28,172,420	x 66.4%	=	18,706,487
2	Present value of increased portion of future projected earned premiums	2,486,822	x 80.0%	=	1,989,458
<b>3</b>	<b>Lifetime Earned Premium Times Prescribed Factor: Sum of 1a, 1b and 2</b>	<b>72,394,098</b>			<b>48,407,889</b>
<b>4</b>	<b>Lifetime Incurred Claims with Rate Increase</b>				<b>58,946,635</b>
<b>5</b>	<b>Test: 4 is not less than 3</b>				<b>TRUE</b>

<sup>1</sup> As prescribed by NAIC Model Bulletin, where 66.4% is the lifetime loss ratio at the time of original pricing

EXHIBIT XIII

RiverSource Life Insurance Company  
Current Annual Premiums

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

LIFETIME BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible						Deductible						Deductible					
	20 days			90 days			20 days			90 days			20 days			90 days		
	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage
40	67.76	77.44	87.12	55.66	64.14	72.60	107.70	122.82	137.94	99.22	112.54	125.84	145.20	163.36	181.50	130.68	146.42	162.14
41	67.76	77.44	87.12	55.66	64.14	72.60	107.70	122.82	137.94	99.22	112.54	125.84	145.20	163.36	181.50	130.68	146.42	162.14
42	67.76	77.44	87.12	55.66	64.14	72.60	107.70	122.82	137.94	99.22	112.54	125.84	145.20	163.36	181.50	130.68	146.42	162.14
43	67.76	77.44	87.12	55.66	64.14	72.60	107.70	122.82	137.94	99.22	112.54	125.84	145.20	163.36	181.50	130.68	146.42	162.14
44	67.76	77.44	87.12	55.66	64.14	72.60	107.70	122.82	137.94	99.22	112.54	125.84	145.20	163.36	181.50	130.68	146.42	162.14
45	67.76	77.44	87.12	55.66	64.14	72.60	107.70	122.82	137.94	99.22	112.54	125.84	145.20	163.36	181.50	130.68	146.42	162.14
46	67.76	77.44	87.12	55.66	64.14	72.60	110.12	125.24	140.36	99.22	112.54	125.84	150.04	168.20	186.34	135.52	151.26	166.98
47	68.98	79.26	89.54	56.88	65.96	75.02	116.16	131.90	147.62	102.86	116.78	130.68	156.10	174.86	193.60	140.36	157.30	174.24
48	68.98	79.26	89.54	59.30	68.38	77.44	121.00	137.94	154.88	105.28	119.20	133.10	164.56	183.92	203.28	144.00	161.54	179.08
49	72.60	83.50	94.38	60.50	70.18	79.86	123.42	140.36	157.30	106.48	121.00	135.52	170.62	190.58	210.54	148.84	166.38	183.92
50	72.60	83.50	94.38	62.92	72.60	82.28	127.06	144.60	162.14	108.90	123.42	137.94	182.72	203.90	225.06	152.46	170.62	188.76
51	75.02	87.12	99.22	64.14	74.42	84.70	130.68	148.84	166.98	114.96	130.08	145.20	187.56	208.74	229.90	156.10	174.86	193.60
52	77.44	89.54	101.64	64.14	74.42	84.70	133.10	151.26	169.40	114.96	130.08	145.20	193.60	215.38	237.16	163.36	182.12	200.86
53	78.66	91.36	104.06	70.18	81.08	91.96	136.74	155.50	174.24	118.58	134.32	150.04	199.66	222.04	244.42	166.98	186.34	205.70
54	78.66	91.36	104.06	70.18	81.08	91.96	142.78	162.14	181.50	121.00	136.74	152.46	208.12	231.12	254.10	170.62	190.58	210.54
55	82.28	95.60	108.90	75.02	87.12	99.22	146.42	166.38	186.34	125.84	142.78	159.72	216.60	240.20	263.78	177.88	199.06	220.22
56	88.34	102.26	116.16	77.44	89.54	101.64	156.10	177.28	198.44	134.32	151.86	169.40	229.90	254.10	278.30	191.18	212.96	234.74
57	96.80	111.32	125.84	83.50	96.20	108.90	166.98	188.76	210.54	145.20	163.36	181.50	240.80	265.60	290.40	204.50	226.88	249.26
58	102.86	117.98	133.10	89.54	102.86	116.16	175.46	197.84	220.22	153.68	172.44	191.18	255.32	281.34	307.34	215.38	238.38	261.36
59	108.90	124.64	140.36	95.60	109.52	123.42	188.76	211.76	234.74	164.56	183.92	203.28	268.62	295.24	321.86	228.70	252.30	275.88
60	118.58	135.52	152.46	101.64	116.16	130.68	197.24	220.84	244.42	177.88	199.06	220.22	279.52	306.74	333.96	239.58	263.78	287.98
61	124.64	142.18	159.72	106.48	121.00	135.52	208.12	232.32	256.52	188.76	210.54	232.32	292.82	320.66	348.48	252.90	277.70	302.50
62	130.68	148.84	166.98	110.12	125.24	140.36	219.02	243.82	268.62	197.24	219.62	242.00	303.72	332.16	360.58	267.42	293.44	319.44
63	136.74	155.50	174.24	118.58	134.32	150.04	231.12	257.14	283.14	208.12	231.12	254.10	317.02	346.06	375.10	278.30	304.92	331.54
64	145.20	164.56	183.92	125.84	142.78	159.72	239.58	266.20	292.82	216.60	240.20	263.78	330.34	359.98	389.62	291.62	318.84	346.06
65	153.68	174.86	196.02	131.90	149.44	166.98	254.10	281.94	309.76	231.12	255.92	280.72	344.86	375.72	406.56	303.72	332.16	360.58
66	180.30	202.68	225.06	153.68	172.44	191.18	294.04	323.68	353.32	263.78	290.40	317.02	392.04	424.72	457.38	342.44	373.30	404.14
67	210.54	234.74	258.94	182.72	203.90	225.06	335.18	367.24	399.30	298.88	327.32	355.74	440.44	475.54	510.62	379.94	412.62	445.28
68	239.58	266.20	292.82	205.70	228.70	251.68	375.10	408.98	442.86	335.18	366.04	396.88	485.22	522.12	559.02	418.66	453.76	488.84
69	272.26	300.70	329.12	231.12	255.92	280.72	413.82	450.12	486.42	372.68	405.36	438.02	537.24	577.18	617.10	456.18	493.08	529.98
70	301.30	332.16	363.00	255.32	282.54	309.76	454.96	493.68	532.40	406.56	441.66	476.74	584.44	626.18	667.92	491.26	529.98	568.70
71	327.92	359.98	392.04	279.52	307.96	336.38	496.10	537.24	578.38	440.44	476.74	513.04	629.20	672.76	716.32	529.98	571.12	612.26
72	360.58	394.46	428.34	303.72	334.58	365.42	536.04	579.00	621.94	477.96	516.08	554.18	681.24	727.82	774.40	567.50	610.46	653.40
73	389.62	425.92	462.22	329.12	361.80	394.46	577.18	622.56	667.92	511.84	552.38	592.90	727.22	776.22	825.22	606.22	651.60	696.96
74	417.46	455.58	493.68	353.32	388.42	423.50	617.10	664.30	711.48	546.92	589.28	631.62	774.40	825.22	876.04	643.72	690.92	738.10
75	451.34	491.88	532.40	381.16	418.06	454.96	661.88	712.10	762.30	585.64	630.42	675.18	826.44	880.28	934.12	686.08	736.30	786.50
76	487.64	533.02	578.38	412.62	454.36	496.10	711.48	767.14	822.80	630.42	680.64	730.84	880.88	940.18	999.46	730.84	786.50	842.16
77	526.36	576.58	626.78	444.08	490.66	537.24	763.52	824.62	885.72	672.76	728.42	784.08	937.76	999.98	999.98	778.04	839.14	900.24
78	562.66	617.72	672.76	475.54	526.96	578.38	813.12	879.68	946.22	717.54	778.64	839.74	992.20	999.98	999.98	825.22	891.78	958.32
79	601.38	661.28	721.16	507.00	563.26	619.52	865.16	938.36	999.98	764.72	832.48	900.24	999.98	999.98	999.98	873.62	946.22	999.98

EXHIBIT XIII

RiverSource Life Insurance Company  
Current Annual Premiums

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

6 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option								
	Deductible			Deductible			Deductible			Deductible			Deductible			Deductible					
	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days			
	Home Care Percentage	50%	75%	100%	Home Care Percentage	50%	75%	100%	Home Care Percentage	50%	75%	100%	Home Care Percentage	50%	75%	100%	Home Care Percentage	50%	75%	100%	
40	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	96.80	108.90	121.00			
41	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	96.80	108.90	121.00			
42	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	96.80	108.90	121.00			
43	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	96.80	108.90	121.00			
44	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	96.80	108.90	121.00			
45	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	96.80	108.90	121.00			
46	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	99.22	111.32	123.42			
47	56.88	65.96	75.02	48.40	55.66	62.92	84.70	96.80	108.90	70.18	79.86	89.54	119.80	134.92	150.04	102.86	115.56	128.26			
48	56.88	65.96	75.02	49.62	57.48	65.34	88.34	101.04	113.74	73.82	84.10	94.38	122.22	137.34	152.46	105.28	117.98	130.68			
49	58.08	67.76	77.44	49.62	57.48	65.34	93.18	105.88	118.58	76.24	86.52	96.80	125.84	141.58	157.30	111.32	124.64	137.94			
50	60.50	70.18	79.86	53.24	61.72	70.18	96.80	110.12	123.42	79.86	90.76	101.64	128.26	144.00	159.72	117.38	131.30	145.20			
51	61.72	72.00	82.28	53.24	61.72	70.18	100.44	114.36	128.26	79.86	90.76	101.64	133.10	150.04	166.98	119.80	133.72	147.62			
52	61.72	72.00	82.28	53.24	61.72	70.18	102.86	116.78	130.68	82.28	93.18	104.06	137.94	154.88	171.82	123.42	137.94	152.46			
53	62.92	73.82	84.70	54.46	63.54	72.60	106.48	121.00	135.52	87.12	99.22	111.32	141.58	159.12	176.66	125.84	140.36	154.88			
54	62.92	73.82	84.70	54.46	63.54	72.60	110.12	125.24	140.36	91.96	104.06	116.16	144.00	161.54	179.08	129.48	144.60	159.72			
55	67.76	79.86	91.96	58.08	67.76	77.44	116.16	131.90	147.62	95.60	108.30	121.00	147.62	165.78	183.92	137.94	153.68	169.40			
56	72.60	84.70	96.80	60.50	70.18	79.86	123.42	140.36	157.30	101.64	114.96	128.26	156.10	174.86	193.60	145.20	162.14	179.08			
57	78.66	91.36	104.06	64.14	74.42	84.70	129.48	147.02	164.56	107.70	121.62	135.52	166.98	186.34	205.70	153.68	171.22	188.76			
58	84.70	98.02	111.32	70.18	81.08	91.96	140.36	158.52	176.66	118.58	133.10	147.62	180.30	200.26	220.22	164.56	182.72	200.86			
59	88.34	102.26	116.16	77.44	89.54	101.64	146.42	165.18	183.92	124.64	139.76	154.88	189.98	211.16	232.32	173.04	191.80	210.54			
60	96.80	111.32	125.84	81.08	93.78	106.48	154.88	174.24	193.60	135.52	151.26	166.98	203.28	225.06	246.84	183.92	203.28	222.64			
61	101.64	116.16	130.68	83.50	96.20	108.90	163.36	183.32	203.28	142.78	159.72	176.66	211.76	234.14	256.52	192.40	212.36	232.32			
62	105.28	120.40	135.52	89.54	102.86	116.16	170.62	191.80	212.96	148.84	166.38	183.92	220.22	243.22	266.20	204.50	225.68	246.84			
63	111.32	127.06	142.78	95.60	109.52	123.42	179.08	200.86	222.64	159.72	177.88	196.02	233.54	257.14	280.72	212.96	234.74	256.52			
64	121.00	137.94	154.88	99.22	113.74	128.26	187.56	209.94	232.32	165.78	184.54	203.28	244.42	268.62	292.82	223.86	246.24	268.62			
65	127.06	144.60	162.14	105.28	120.40	135.52	197.24	220.84	244.42	175.46	195.42	215.38	257.74	283.76	309.76	232.32	255.32	278.30			
66	146.42	165.18	183.92	123.42	140.36	157.30	223.86	249.88	275.88	203.28	225.06	246.84	292.82	320.66	348.48	257.74	282.54	307.34			
67	168.20	189.38	210.54	142.78	160.94	179.08	254.10	281.94	309.76	231.12	254.72	278.30	327.92	358.78	389.62	285.56	313.40	341.22			
68	187.56	209.94	232.32	157.30	176.66	196.02	281.94	311.58	341.22	257.74	283.76	309.76	363.00	395.68	428.34	315.82	345.46	375.10			
69	208.12	232.32	256.52	179.08	200.86	222.64	308.56	340.62	372.68	284.36	311.58	338.80	400.52	436.22	471.90	343.64	376.32	408.98			
70	227.48	254.10	280.72	198.44	221.44	244.42	338.80	372.68	406.56	312.18	341.22	370.26	433.18	470.70	508.20	373.90	409.60	445.28			
71	246.84	274.68	302.50	215.38	239.58	263.78	367.84	404.14	440.44	341.22	372.68	404.14	470.70	511.24	551.76	401.72	439.24	476.74			
72	267.42	297.06	326.70	237.16	263.78	290.40	393.26	431.38	469.48	365.42	398.10	430.76	505.78	548.14	590.48	429.56	470.10	510.62			
73	287.98	319.44	350.90	254.10	281.94	309.76	422.30	462.84	503.36	396.88	431.98	467.06	540.88	586.26	631.62	457.38	499.74	542.08			
74	308.56	341.84	375.10	273.46	302.50	331.54	452.54	494.90	537.24	422.30	459.20	496.10	575.96	623.16	670.34	485.22	530.60	575.96			
75	332.76	368.46	404.14	292.82	324.28	355.74	482.80	528.18	573.54	450.12	488.84	527.56	615.90	666.12	716.32	516.68	564.48	612.26			
76	373.90	412.02	450.12	333.96	367.84	401.72	538.46	587.46	636.46	505.78	548.14	590.48	672.76	727.22	781.66	573.54	625.58	677.60			
77	416.24	457.38	498.52	376.32	413.22	450.12	592.90	644.94	696.96	561.44	607.42	653.40	732.06	790.74	849.42	632.84	689.10	745.36			
78	457.38	500.94	544.50	418.66	458.60	498.52	652.20	708.46	764.72	620.74	670.96	721.16	791.34	854.26	917.18	692.12	752.62	813.12			
79	503.36	550.56	597.74	463.44	506.40	549.34	710.28	770.18	830.06	678.82	732.66	786.50	849.42	915.98	982.52	749.00	813.74	878.46			

EXHIBIT XIII

RiverSource Life Insurance Company  
Current Annual Premiums

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

4 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible			Deductible			Deductible			Deductible			Deductible			Deductible		
	20 days			90 days			20 days			90 days			20 days			90 days		
	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage
40	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
41	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
42	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
43	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
44	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
45	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
46	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
47	45.98	53.24	60.50	32.68	38.12	43.56	70.18	79.86	89.54	55.66	64.14	72.60	108.90	121.00	133.10	91.96	101.64	111.32
48	47.20	55.06	62.92	33.88	39.94	45.98	71.40	81.68	91.96	58.08	66.56	75.02	110.12	122.82	135.52	95.60	105.88	116.16
49	49.62	57.48	65.34	36.30	42.36	48.40	73.82	84.10	94.38	59.30	68.38	77.44	112.54	125.24	137.94	95.60	105.88	116.16
50	50.82	59.30	67.76	38.72	45.98	53.24	77.44	88.34	99.22	61.72	70.80	79.86	116.16	129.48	142.78	99.22	110.12	121.00
51	50.82	59.30	67.76	38.72	45.98	53.24	77.44	88.34	99.22	61.72	70.80	79.86	116.16	129.48	142.78	99.22	110.12	121.00
52	53.24	61.72	70.18	43.56	50.82	58.08	79.86	90.76	101.64	62.92	72.60	82.28	118.58	131.90	145.20	99.22	110.12	121.00
53	54.46	63.54	72.60	44.78	52.64	60.50	82.28	94.38	106.48	67.76	77.44	87.12	119.80	133.72	147.62	104.06	116.16	128.26
54	54.46	63.54	72.60	44.78	52.64	60.50	84.70	96.80	108.90	67.76	77.44	87.12	122.22	136.14	150.04	104.06	116.16	128.26
55	58.08	67.76	77.44	48.40	56.88	65.34	88.34	101.04	113.74	71.40	81.68	91.96	125.84	140.36	154.88	110.12	122.82	135.52
56	60.50	70.18	79.86	50.82	59.30	67.76	96.80	110.12	123.42	77.44	88.34	99.22	134.32	149.44	164.56	116.16	129.48	142.78
57	64.14	74.42	84.70	54.46	63.54	72.60	102.86	116.78	130.68	84.70	96.80	108.90	140.36	156.10	171.82	122.22	136.14	150.04
58	70.18	81.08	91.96	58.08	67.76	77.44	108.90	123.42	137.94	93.18	105.88	118.58	151.26	168.80	186.34	128.26	142.78	157.30
59	77.44	89.54	101.64	61.72	72.00	82.28	117.38	132.50	147.62	99.22	112.54	125.84	159.72	177.88	196.02	140.36	156.10	171.82
60	81.08	93.78	106.48	70.18	81.08	91.96	125.84	142.78	159.72	108.90	123.42	137.94	169.40	188.76	208.12	147.62	164.56	181.50
61	84.70	98.02	111.32	72.60	83.50	94.38	131.90	149.44	166.98	117.38	132.50	147.62	175.46	195.42	215.38	153.68	171.22	188.76
62	90.76	104.68	118.58	77.44	89.54	101.64	140.36	158.52	176.66	123.42	139.16	154.88	185.14	206.32	227.48	165.78	184.54	203.28
63	96.80	111.32	125.84	81.08	93.78	106.48	146.42	165.18	183.92	130.68	147.62	164.56	194.82	217.20	239.58	171.82	191.18	210.54
64	100.44	115.56	130.68	84.70	98.02	111.32	152.46	171.82	191.18	139.16	156.70	174.24	200.86	223.86	246.84	180.30	200.26	220.22
65	106.48	122.22	137.94	90.76	104.68	118.58	165.78	186.96	208.12	148.84	167.60	186.34	212.96	237.16	261.36	191.18	212.96	234.74
66	124.64	142.18	159.72	105.28	120.40	135.52	187.56	209.94	232.32	168.20	188.16	208.12	239.58	266.20	292.82	214.18	237.78	261.36
67	142.78	162.14	181.50	123.42	140.36	157.30	210.54	234.74	258.94	192.40	214.78	237.16	267.42	295.86	324.28	240.80	266.82	292.82
68	158.52	179.70	200.86	140.36	158.52	176.66	237.16	263.78	290.40	214.18	237.78	261.36	298.88	329.74	360.58	266.20	294.04	321.86
69	176.66	199.66	222.64	152.46	171.82	191.18	260.16	288.60	317.02	235.96	261.98	287.98	327.92	361.20	394.46	296.46	327.32	358.16
70	194.82	219.62	244.42	171.82	193.60	215.38	286.78	317.64	348.48	258.94	286.78	314.60	356.96	392.66	428.34	321.86	354.54	387.20
71	212.96	239.58	266.20	188.76	211.76	234.74	309.76	342.44	375.10	280.72	309.76	338.80	384.78	422.30	459.80	346.06	381.16	416.24
72	228.70	257.14	285.56	200.86	225.06	249.26	333.96	369.06	404.14	302.50	333.96	365.42	415.04	455.58	496.10	372.68	410.20	447.70
73	245.64	275.28	304.92	219.02	245.04	271.04	359.38	396.28	433.18	324.28	356.96	389.62	442.86	485.22	527.56	399.30	439.24	479.16
74	265.00	297.06	329.12	235.96	263.18	290.40	384.78	423.50	462.22	348.48	383.58	418.66	474.32	519.10	563.86	424.72	466.46	508.20
75	285.56	319.44	353.32	254.10	283.14	312.18	411.40	452.54	493.68	371.48	408.38	445.28	503.36	550.56	597.74	454.96	499.74	544.50
76	325.50	362.40	399.30	291.62	323.68	355.74	454.96	499.74	544.50	415.04	455.58	496.10	548.14	599.56	650.98	499.74	548.74	597.74
77	363.00	402.94	442.86	331.54	366.64	401.72	499.74	547.54	595.32	459.80	503.36	546.92	592.90	648.56	704.22	543.30	595.94	648.56
78	404.14	446.50	488.84	372.68	410.20	447.70	546.92	598.96	650.98	507.00	554.80	602.58	640.10	700.00	759.88	590.48	647.36	704.22
79	445.28	491.26	537.24	413.82	454.96	496.10	592.90	648.56	704.22	552.98	604.40	655.82	684.86	749.00	813.12	635.26	696.36	757.46
80				454.96	498.52					600.16	655.82					682.44	747.78	
81				494.90	541.48					648.56	707.86					727.22	796.80	
82				538.46	588.68					695.76	759.28					774.40	848.22	
83				582.02	635.86					742.94	810.70					821.60	899.64	
84				621.94	678.82					788.92	860.32					868.78	951.06	

EXHIBIT XIII

RiverSource Life Insurance Company  
Current Annual Premiums

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

2 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible						Deductible						Deductible					
	20 days			90 days			20 days			90 days			20 days			90 days		
	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage
40	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
41	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
42	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
43	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
44	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
45	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
46	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
47	32.68	38.12	43.56	25.42	29.66	33.88	54.46	62.32	70.18	43.56	49.62	55.66	77.44	87.12	96.80	64.14	72.00	79.86
48	33.88	39.94	45.98	26.62	31.46	36.30	55.66	64.14	72.60	45.98	53.24	60.50	77.44	87.12	96.80	67.76	76.24	84.70
49	33.88	39.94	45.98	26.62	31.46	36.30	58.08	66.56	75.02	48.40	55.66	62.92	81.08	91.36	101.64	67.76	76.24	84.70
50	38.72	45.98	53.24	30.26	35.70	41.14	61.72	70.80	79.86	52.04	59.90	67.76	81.08	91.36	101.64	71.40	80.48	89.54
51	38.72	45.98	53.24	30.26	35.70	41.14	61.72	70.80	79.86	52.04	59.90	67.76	84.70	95.60	106.48	73.82	82.90	91.96
52	38.72	45.98	53.24	30.26	35.70	41.14	66.56	75.64	84.70	54.46	62.32	70.18	84.70	95.60	106.48	73.82	82.90	91.96
53	39.94	47.80	55.66	31.46	37.52	43.56	67.76	77.44	87.12	55.66	64.14	72.60	91.96	104.06	116.16	77.44	87.12	96.80
54	39.94	47.80	55.66	31.46	37.52	43.56	70.18	79.86	89.54	58.08	66.56	75.02	91.96	104.06	116.16	79.86	89.54	99.22
55	45.98	54.46	62.92	36.30	43.56	50.82	73.82	84.10	94.38	61.72	70.80	79.86	95.60	108.30	121.00	83.50	93.78	104.06
56	48.40	56.88	65.34	36.30	43.56	50.82	76.24	86.52	96.80	66.56	75.64	84.70	99.22	112.54	125.84	89.54	100.44	111.32
57	52.04	61.12	70.18	39.94	47.80	55.66	82.28	93.18	104.06	72.60	82.28	91.96	105.28	119.20	133.10	94.38	106.48	118.58
58	55.66	65.34	75.02	45.98	54.46	62.92	87.12	99.22	111.32	76.24	86.52	96.80	113.74	128.26	142.78	100.44	113.14	125.84
59	59.30	69.58	79.86	48.40	56.88	65.34	95.60	108.30	121.00	82.28	93.18	104.06	119.80	134.92	150.04	104.06	117.38	130.68
60	65.34	76.24	87.12	52.04	61.12	70.18	99.22	112.54	125.84	87.12	99.22	111.32	125.84	141.58	157.30	112.54	126.46	140.36
61	70.18	81.08	91.96	55.66	65.34	75.02	105.28	119.20	133.10	95.60	108.30	121.00	133.10	150.04	166.98	116.16	130.68	145.20
62	75.02	87.12	99.22	58.08	67.76	77.44	108.90	123.42	137.94	99.22	112.54	125.84	141.58	159.12	176.66	119.80	134.92	150.04
63	78.66	91.36	104.06	61.72	72.00	82.28	117.38	132.50	147.62	105.28	119.20	133.10	147.62	165.78	183.92	125.84	141.58	157.30
64	82.28	95.60	108.90	65.34	76.24	87.12	121.00	136.74	152.46	108.90	123.42	137.94	153.68	172.44	191.18	130.68	147.62	164.56
65	88.34	102.26	116.16	72.60	84.70	96.80	128.26	145.20	162.14	117.38	132.50	147.62	162.14	181.50	200.86	139.16	156.70	174.24
66	100.44	115.56	130.68	82.28	95.60	108.90	142.78	160.94	179.08	128.26	145.20	162.14	182.72	203.90	225.06	151.26	170.02	188.76
67	111.32	128.26	145.20	91.96	106.48	121.00	154.88	174.24	193.60	140.36	158.52	176.66	199.66	222.04	244.42	165.78	185.74	205.70
68	125.84	144.00	162.14	104.06	119.80	135.52	171.82	193.60	215.38	150.04	169.40	188.76	220.22	244.42	268.62	180.30	202.68	225.06
69	135.52	154.88	174.24	114.96	132.50	150.04	186.34	209.34	232.32	160.94	182.12	203.28	240.80	266.82	292.82	194.82	218.42	242.00
70	152.46	174.24	196.02	127.06	145.82	164.56	202.08	226.88	251.68	173.04	195.42	217.80	261.36	289.20	317.02	211.76	237.78	263.78
71	162.14	185.14	208.12	136.74	156.70	176.66	217.80	244.42	271.04	182.72	206.32	229.90	280.72	309.76	338.80	223.86	251.08	278.30
72	174.24	198.44	222.64	150.04	171.82	193.60	229.90	257.74	285.56	194.82	219.62	244.42	301.30	332.16	363.00	238.38	266.82	295.24
73	187.56	213.58	239.58	159.72	182.72	205.70	245.64	275.28	304.92	205.70	232.32	258.94	321.86	354.54	387.20	252.90	283.76	314.60
74	199.66	226.88	254.10	171.82	196.02	220.22	261.36	292.82	324.28	217.80	245.64	273.46	341.22	375.10	408.98	267.42	299.48	331.54
75	212.96	242.00	271.04	185.14	211.16	237.16	277.10	310.38	343.64	227.48	256.52	285.56	363.00	399.30	435.60	285.56	319.44	353.32
76	243.22	275.28	307.34	211.76	240.20	268.62	302.50	338.80	375.10	252.90	284.96	317.02	392.04	430.76	469.48	315.82	352.72	389.62
77	273.46	308.56	343.64	244.42	275.88	307.34	331.54	370.26	408.98	280.72	315.82	350.90	422.30	464.04	505.78	346.06	386.00	425.92
78	303.72	341.84	379.94	275.88	310.98	346.06	356.96	398.70	440.44	304.92	342.44	379.94	454.96	499.74	544.50	377.52	419.88	462.22
79	333.96	375.10	416.24	302.50	340.02	377.52	386.00	431.38	476.74	336.38	377.52	418.66	484.00	531.20	578.38	407.78	453.16	498.52
80				336.38	377.52					360.58	404.14					436.82	484.62	
81				365.42	408.98					388.42	435.00					469.48	520.30	
82				396.88	444.08					417.46	467.68					499.74	553.58	
83				430.76	481.58					446.50	500.34					531.20	587.46	
84				462.22	516.68					476.74	533.62					561.44	620.74	

EXHIBIT XIV

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

LIFETIME BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option							
	Deductible			Deductible			Deductible			Deductible			Deductible			Deductible				
	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days		
	Home Care Percentage	50%	75%	100%	Home Care Percentage	50%	75%	100%	Home Care Percentage	50%	75%	100%	Home Care Percentage	50%	75%	100%	Home Care Percentage	50%	75%	100%
40	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36		
41	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36		
42	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36		
43	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36		
44	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36		
45	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36		
46	74.54	85.18	95.84	61.22	70.56	79.86	121.14	137.76	154.40	109.14	123.80	138.42	165.04	185.02	204.98	149.08	166.38	183.68		
47	75.88	87.18	98.50	62.56	72.56	82.52	127.78	145.10	162.38	113.14	128.46	143.74	171.72	192.34	212.96	154.40	173.04	191.66		
48	75.88	87.18	98.50	65.24	75.22	85.18	133.10	151.74	170.36	115.80	131.12	146.42	181.02	202.32	223.60	158.40	177.70	196.98		
49	79.86	91.86	103.82	66.56	77.20	87.84	135.76	154.40	173.04	117.12	133.10	149.08	187.68	209.64	231.60	163.72	183.02	202.32		
50	79.86	91.86	103.82	69.22	79.86	90.50	139.76	159.06	178.36	119.80	135.76	151.74	201.00	224.30	247.56	167.70	187.68	207.64		
51	82.52	95.84	109.14	70.56	81.86	93.18	143.74	163.72	183.68	126.46	143.08	159.72	206.32	229.62	252.90	171.72	192.34	212.96		
52	85.18	98.50	111.80	70.56	81.86	93.18	146.42	166.38	186.34	126.46	143.08	159.72	212.96	236.92	260.88	179.70	200.34	220.94		
53	86.52	100.50	114.46	77.20	89.18	101.16	150.42	171.06	191.66	130.44	147.76	165.04	219.62	244.24	268.86	183.68	204.98	226.28		
54	86.52	100.50	114.46	77.20	89.18	101.16	157.06	178.36	199.66	133.10	150.42	167.70	228.94	254.24	279.52	187.68	209.64	231.60		
55	90.50	105.16	119.80	82.52	95.84	109.14	161.06	183.02	204.98	138.42	157.06	175.70	238.26	264.22	290.16	195.66	218.96	242.24		
56	97.18	112.48	127.78	85.18	98.50	111.80	171.72	195.00	218.28	147.76	167.04	186.34	252.90	279.52	306.14	210.30	234.26	258.22		
57	106.48	122.46	138.42	91.86	105.82	119.80	183.68	207.64	231.60	159.72	179.70	199.66	264.88	292.16	319.44	224.96	249.56	274.18		
58	113.14	129.78	146.42	98.50	113.14	127.78	193.00	217.62	242.24	169.04	189.68	210.30	280.86	309.48	338.08	236.92	262.22	287.50		
59	119.80	137.10	154.40	105.16	120.48	135.76	207.64	232.94	258.22	181.02	202.32	223.60	295.48	324.76	354.04	251.58	277.54	303.46		
60	130.44	149.08	167.70	111.80	127.78	143.74	216.96	242.92	268.86	195.66	218.96	242.24	307.48	337.42	367.36	263.54	290.16	316.78		
61	137.10	156.40	175.70	117.12	133.10	149.08	228.94	255.56	282.18	207.64	231.60	255.56	322.10	352.72	383.32	278.20	305.48	332.76		
62	143.74	163.72	183.68	121.14	137.76	154.40	240.92	268.20	295.48	216.96	241.58	266.20	334.10	365.38	396.64	294.16	322.78	351.38		
63	150.42	171.06	191.66	130.44	147.76	165.04	254.24	282.86	311.46	228.94	254.24	279.52	348.72	380.66	412.62	306.14	335.42	364.70		
64	159.72	181.02	202.32	138.42	157.06	175.70	263.54	292.82	322.10	238.26	264.22	290.16	363.38	395.98	428.58	320.78	350.72	380.66		
65	169.04	192.34	215.62	145.10	164.38	183.68	279.52	310.14	340.74	254.24	281.52	308.80	379.34	413.30	447.22	334.10	365.38	396.64		
66	198.34	222.94	247.56	169.04	189.68	210.30	323.44	356.04	388.66	290.16	319.44	348.72	431.24	467.20	503.12	376.68	410.64	444.56		
67	231.60	258.22	284.84	201.00	224.30	247.56	368.70	403.96	439.24	328.76	360.06	391.32	484.48	523.10	561.68	417.94	453.88	489.80		
68	263.54	292.82	322.10	226.28	251.58	276.84	412.62	449.88	487.14	368.70	402.64	436.56	533.74	574.34	614.92	460.52	499.14	537.72		
69	299.48	330.78	362.04	254.24	281.52	308.80	455.20	495.14	535.06	409.94	445.90	481.82	590.96	634.90	678.82	501.80	542.38	582.98		
70	331.44	365.38	399.30	280.86	310.80	340.74	500.46	543.04	585.64	447.22	485.82	524.42	642.88	688.80	734.72	540.38	582.98	625.58		
71	360.72	395.98	431.24	307.48	338.76	370.02	545.72	590.96	636.22	484.48	524.42	564.34	692.12	740.04	787.96	582.98	628.24	673.48		
72	396.64	433.90	471.18	334.10	368.04	401.96	589.64	636.90	684.14	525.76	567.68	609.60	749.36	800.60	851.84	624.26	671.50	718.74		
73	428.58	468.52	508.44	362.04	397.98	433.90	634.90	684.82	734.72	563.02	607.62	652.20	799.94	853.84	907.74	666.84	716.76	766.66		
74	459.20	501.14	543.04	388.66	427.26	465.86	678.82	730.74	782.62	601.62	648.20	694.78	851.84	907.74	963.64	708.10	760.02	811.92		
75	496.48	541.06	585.64	419.28	459.86	500.46	728.06	783.32	838.54	644.20	693.46	742.70	909.08	968.30	999.98	754.68	809.94	865.16		
76	536.40	586.32	636.22	453.88	499.80	545.72	782.62	843.86	905.08	693.46	748.70	803.92	968.96	999.98	999.98	803.92	865.16	926.38		
77	579.00	634.24	689.46	488.48	539.72	590.96	839.88	907.08	974.30	740.04	801.26	862.48	999.98	999.98	999.98	855.84	923.06	990.26		
78	618.92	679.50	740.04	523.10	579.66	636.22	894.44	967.64	999.98	789.30	856.50	923.72	999.98	999.98	999.98	907.74	980.96	999.98		
79	661.52	727.40	793.28	557.70	619.58	681.48	951.68	999.98	999.98	841.20	915.72	990.26	999.98	999.98	999.98	960.98	999.98	999.98		

EXHIBIT XIV

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

6 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible			Deductible			Deductible			Deductible			Deductible			Deductible		
	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days
	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage
40	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
41	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
42	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
43	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
44	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
45	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
46	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	109.14	122.46	135.76
47	62.56	72.56	82.52	53.24	61.22	69.22	93.18	106.48	119.80	77.20	87.84	98.50	131.78	148.42	165.04	113.14	127.12	141.08
48	62.56	72.56	82.52	54.58	63.22	71.88	97.18	111.14	125.12	81.20	92.52	103.82	134.44	151.08	167.70	115.80	129.78	143.74
49	63.88	74.54	85.18	54.58	63.22	71.88	102.50	116.46	130.44	83.86	95.18	106.48	138.42	155.74	173.04	122.46	137.10	151.74
50	66.56	77.20	87.84	58.56	67.90	77.20	106.48	121.14	135.76	87.84	99.84	111.80	141.08	158.40	175.70	129.12	144.44	159.72
51	67.90	79.20	90.50	58.56	67.90	77.20	110.48	125.80	141.08	87.84	99.84	111.80	146.42	165.04	183.68	131.78	147.10	162.38
52	67.90	79.20	90.50	58.56	67.90	77.20	113.14	128.46	143.74	90.50	102.50	114.46	151.74	170.36	189.00	135.76	151.74	167.70
53	69.22	81.20	93.18	59.90	69.90	79.86	117.12	133.10	149.08	95.84	109.14	122.46	155.74	175.04	194.32	138.42	154.40	170.36
54	69.22	81.20	93.18	59.90	69.90	79.86	121.14	137.76	154.40	101.16	114.46	127.78	158.40	177.70	196.98	142.42	159.06	175.70
55	74.54	87.84	101.16	63.88	74.54	85.18	127.78	145.10	162.38	105.16	119.14	133.10	162.38	182.36	202.32	151.74	169.04	186.34
56	79.86	93.18	106.48	66.56	77.20	87.84	135.76	154.40	173.04	111.80	126.46	141.08	171.72	192.34	212.96	159.72	178.36	196.98
57	86.52	100.50	114.46	70.56	81.86	93.18	142.42	161.72	181.02	118.48	133.78	149.08	183.68	204.98	226.28	169.04	188.34	207.64
58	93.18	107.82	122.46	77.20	89.18	101.16	154.40	174.38	194.32	130.44	146.42	162.38	198.34	220.28	242.24	181.02	201.00	220.94
59	97.18	112.48	127.78	85.18	98.50	111.80	161.06	181.70	202.32	137.10	153.74	170.36	208.98	232.28	255.56	190.34	210.98	231.60
60	106.48	122.46	138.42	89.18	103.16	117.12	170.36	191.66	212.96	149.08	166.38	183.68	223.60	247.56	271.52	202.32	223.60	244.90
61	111.80	127.78	143.74	91.86	105.82	119.80	179.70	201.66	223.60	157.06	175.70	194.32	232.94	257.56	282.18	211.64	233.60	255.56
62	115.80	132.44	149.08	98.50	113.14	127.78	187.68	210.98	234.26	163.72	183.02	202.32	242.24	267.54	292.82	224.96	248.24	271.52
63	122.46	139.76	157.06	105.16	120.48	135.76	196.98	220.94	244.90	175.70	195.66	215.62	256.90	282.86	308.80	234.26	258.22	282.18
64	133.10	151.74	170.36	109.14	125.12	141.08	206.32	230.94	255.56	182.36	203.00	223.60	268.86	295.48	322.10	246.24	270.86	295.48
65	139.76	159.06	178.36	115.80	132.44	149.08	216.96	242.92	268.86	193.00	214.96	236.92	283.52	312.14	340.74	255.56	280.86	306.14
66	161.06	181.70	202.32	135.76	154.40	173.04	246.24	274.86	303.46	223.60	247.56	271.52	322.10	352.72	383.32	283.52	310.80	338.08
67	185.02	208.32	231.60	157.06	177.04	196.98	279.52	310.14	340.74	254.24	280.20	306.14	360.72	394.66	428.58	314.12	344.74	375.34
68	206.32	230.94	255.56	173.04	194.32	215.62	310.14	342.74	375.34	283.52	312.14	340.74	399.30	435.24	471.18	347.40	380.00	412.62
69	228.94	255.56	282.18	196.98	220.94	244.90	339.42	374.68	409.94	312.80	342.74	372.68	440.58	479.84	519.10	378.00	413.96	449.88
70	250.22	279.52	308.80	218.28	243.58	268.86	372.68	409.94	447.22	343.40	375.34	407.28	476.50	517.78	559.02	411.30	450.56	489.80
71	271.52	302.14	332.76	236.92	263.54	290.16	404.62	444.56	484.48	375.34	409.94	444.56	517.78	562.36	606.94	441.90	483.16	524.42
72	294.16	326.76	359.38	260.88	290.16	319.44	432.58	474.52	516.42	401.96	437.92	473.84	556.36	602.96	649.52	472.52	517.12	561.68
73	316.78	351.38	386.00	279.52	310.14	340.74	464.54	509.12	553.70	436.56	475.18	513.76	594.96	644.88	694.78	503.12	549.72	596.28
74	339.42	376.02	412.62	300.80	332.76	364.70	497.80	544.40	590.96	464.54	505.12	545.72	633.56	685.48	737.38	533.74	583.66	633.56
75	366.04	405.30	444.56	322.10	356.70	391.32	531.08	581.00	630.90	495.14	537.72	580.32	677.50	732.74	787.96	568.34	620.92	673.48
76	411.30	453.22	495.14	367.36	404.62	441.90	592.30	646.20	700.10	556.36	602.96	649.52	740.04	799.94	859.82	630.90	688.14	745.36
77	457.86	503.12	548.38	413.96	454.54	495.14	652.20	709.44	766.66	617.58	668.16	718.74	805.26	869.82	934.36	696.12	758.02	819.90
78	503.12	551.04	598.96	460.52	504.46	548.38	717.42	779.30	841.20	682.82	738.06	793.28	870.48	939.68	999.98	761.34	827.88	894.44
79	553.70	605.62	657.52	509.78	557.04	604.28	781.30	847.20	913.06	746.70	805.92	865.16	934.36	999.98	999.98	823.90	895.12	966.30

EXHIBIT XIV

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

4 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible						Deductible						Deductible					
	20 days			90 days			20 days			90 days			20 days			90 days		
	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage
	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%
40	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
41	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
42	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
43	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
44	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
45	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
46	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
47	50.58	58.56	66.56	35.94	41.94	47.92	77.20	87.84	98.50	61.22	70.56	79.86	119.80	133.10	146.42	101.16	111.80	122.46
48	51.92	60.56	69.22	37.26	43.94	50.58	78.54	89.84	101.16	63.88	73.22	82.52	121.14	135.10	149.08	105.16	116.46	127.78
49	54.58	63.22	71.88	39.94	46.60	53.24	81.20	92.52	103.82	65.24	75.22	85.18	123.80	137.76	151.74	105.16	116.46	127.78
50	55.90	65.24	74.54	42.60	50.58	58.56	85.18	97.18	109.14	67.90	77.88	87.84	127.78	142.42	157.06	109.14	121.14	133.10
51	55.90	65.24	74.54	42.60	50.58	58.56	85.18	97.18	109.14	67.90	77.88	87.84	127.78	142.42	157.06	109.14	121.14	133.10
52	58.56	67.90	77.20	47.92	55.90	63.88	87.84	99.84	111.80	69.22	79.86	90.50	130.44	145.10	159.72	109.14	121.14	133.10
53	59.90	69.90	79.86	49.26	57.90	66.56	90.50	103.82	117.12	74.54	85.18	95.84	131.78	147.10	162.38	114.46	127.78	141.08
54	59.90	69.90	79.86	49.26	57.90	66.56	93.18	106.48	119.80	74.54	85.18	95.84	134.44	149.76	165.04	114.46	127.78	141.08
55	63.88	74.54	85.18	53.24	62.56	71.88	97.18	111.14	125.12	78.54	89.84	101.16	138.42	154.40	170.36	121.14	135.10	149.08
56	66.56	77.20	87.84	55.90	65.24	74.54	106.48	121.14	135.76	85.18	97.18	109.14	147.76	164.38	181.02	127.78	142.42	157.06
57	70.56	81.86	93.18	59.90	69.90	79.86	113.14	128.46	143.74	93.18	106.48	119.80	154.40	171.72	189.00	134.44	149.76	165.04
58	77.20	89.18	101.16	63.88	74.54	85.18	119.80	135.76	151.74	102.50	116.46	130.44	166.38	185.68	204.98	141.08	157.06	173.04
59	85.18	98.50	111.80	67.90	79.20	90.50	129.12	145.76	162.38	109.14	123.80	138.42	175.70	195.66	215.62	154.40	171.72	189.00
60	89.18	103.16	117.12	77.20	89.18	101.16	138.42	157.06	175.70	119.80	135.76	151.74	186.34	207.64	228.94	162.38	181.02	199.66
61	93.18	107.82	122.46	79.86	91.86	103.82	145.10	164.38	183.68	129.12	145.76	162.38	193.00	214.96	236.92	169.04	188.34	207.64
62	99.84	115.14	130.44	85.18	98.50	111.80	154.40	174.38	194.32	135.76	153.08	170.36	203.66	226.96	250.22	182.36	203.00	223.60
63	106.48	122.46	138.42	89.18	103.16	117.12	161.06	181.70	202.32	143.74	162.38	181.02	214.30	238.92	263.54	189.00	210.30	231.60
64	110.48	127.12	143.74	93.18	107.82	122.46	167.70	189.00	210.30	153.08	172.38	191.66	220.94	246.24	271.52	198.34	220.28	242.24
65	117.12	134.44	151.74	99.84	115.14	130.44	182.36	205.66	228.94	163.72	184.36	204.98	234.26	260.88	287.50	210.30	234.26	258.22
66	137.10	156.40	175.70	115.80	132.44	149.08	206.32	230.94	255.56	185.02	206.98	228.94	263.54	292.82	322.10	235.60	261.56	287.50
67	157.06	178.36	199.66	135.76	154.40	173.04	231.60	258.22	284.84	211.64	236.26	260.88	294.16	325.44	356.70	264.88	293.50	322.10
68	174.38	197.68	220.94	154.40	174.38	194.32	260.88	290.16	319.44	235.60	261.56	287.50	328.76	362.72	396.64	292.82	323.44	354.04
69	194.32	219.62	244.90	167.70	189.00	210.30	286.18	317.46	348.72	259.56	288.18	316.78	360.72	397.32	433.90	326.10	360.06	393.98
70	214.30	241.58	268.86	189.00	212.96	236.92	315.46	349.40	383.32	284.84	315.46	346.06	392.66	431.92	471.18	354.04	390.00	425.92
71	234.26	263.54	292.82	207.64	232.94	258.22	340.74	376.68	412.62	308.80	340.74	372.68	423.26	464.54	505.78	380.66	419.28	457.86
72	251.58	282.86	314.12	220.94	247.56	274.18	367.36	405.96	444.56	332.76	367.36	401.96	456.54	501.14	545.72	409.94	451.22	492.48
73	270.20	302.80	335.42	240.92	269.54	298.14	395.32	435.90	476.50	356.70	392.66	428.58	487.14	533.74	580.32	439.24	483.16	527.08
74	291.50	326.76	362.04	259.56	289.50	319.44	423.26	465.86	508.44	383.32	421.94	460.52	521.76	571.02	620.24	467.20	513.10	559.02
75	314.12	351.38	388.66	279.52	311.46	343.40	452.54	497.80	543.04	408.62	449.22	489.80	553.70	605.62	657.52	500.46	549.72	598.96
76	358.06	398.64	439.24	320.78	356.04	391.32	500.46	549.72	598.96	456.54	501.14	545.72	602.96	659.52	716.08	549.72	603.62	657.52
77	399.30	443.24	487.14	364.70	403.30	441.90	549.72	602.30	654.86	505.78	553.70	601.62	652.20	713.42	774.64	597.64	655.54	713.42
78	444.56	491.16	537.72	409.94	451.22	492.48	601.62	658.86	716.08	557.70	610.28	662.84	704.12	770.00	835.86	649.52	712.10	774.64
79	489.80	540.38	590.96	455.20	500.46	545.72	652.20	713.42	774.64	608.28	664.84	721.40	753.34	823.90	894.44	698.78	766.00	833.20
80				500.46	548.38					660.18	721.40					750.68	822.56	
81				544.40	595.62					713.42	778.64					799.94	876.48	
82				592.30	647.54					765.34	835.20					851.84	933.04	
83				640.22	699.44					817.24	891.78					903.76	989.60	
84				684.14	746.70					867.82	946.36					955.66	999.98	

EXHIBIT XIV

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

2 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible						Deductible						Deductible					
	20 days			90 days			20 days			90 days			20 days			90 days		
	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage
	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%
40	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
41	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
42	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
43	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
44	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
45	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
46	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
47	35.94	41.94	47.92	27.96	32.62	37.26	59.90	68.56	77.20	47.92	54.58	61.22	85.18	95.84	106.48	70.56	79.20	87.84
48	37.26	43.94	50.58	29.28	34.60	39.94	61.22	70.56	79.86	50.58	58.56	66.56	85.18	95.84	106.48	74.54	83.86	93.18
49	37.26	43.94	50.58	29.28	34.60	39.94	63.88	73.22	82.52	53.24	61.22	69.22	89.18	100.50	111.80	74.54	83.86	93.18
50	42.60	50.58	58.56	33.28	39.28	45.26	67.90	77.88	87.84	57.24	65.90	74.54	89.18	100.50	111.80	78.54	88.52	98.50
51	42.60	50.58	58.56	33.28	39.28	45.26	67.90	77.88	87.84	57.24	65.90	74.54	93.18	105.16	117.12	81.20	91.20	101.16
52	42.60	50.58	58.56	33.28	39.28	45.26	73.22	83.20	93.18	59.90	68.56	77.20	93.18	105.16	117.12	81.20	91.20	101.16
53	43.94	52.58	61.22	34.60	41.28	47.92	74.54	85.18	95.84	61.22	70.56	79.86	101.16	114.46	127.78	85.18	95.84	106.48
54	43.94	52.58	61.22	34.60	41.28	47.92	77.20	87.84	98.50	63.88	73.22	82.52	101.16	114.46	127.78	87.84	98.50	109.14
55	50.58	59.90	69.22	39.94	47.92	55.90	81.20	92.52	103.82	67.90	77.88	87.84	105.16	119.14	133.10	91.86	103.16	114.46
56	53.24	62.56	71.88	39.94	47.92	55.90	83.86	95.18	106.48	73.22	83.20	93.18	109.14	123.80	138.42	98.50	110.48	122.46
57	57.24	67.24	77.20	43.94	52.58	61.22	90.50	102.50	114.46	79.86	90.50	101.16	115.80	131.12	146.42	103.82	117.12	130.44
58	61.22	71.88	82.52	50.58	59.90	69.22	95.84	109.14	122.46	83.86	95.18	106.48	125.12	141.08	157.06	110.48	124.46	138.42
59	65.24	76.54	87.84	53.24	62.56	71.88	105.16	119.14	133.10	90.50	102.50	114.46	131.78	148.42	165.04	114.46	129.12	143.74
60	71.88	83.86	95.84	57.24	67.24	77.20	109.14	123.80	138.42	95.84	109.14	122.46	138.42	155.74	173.04	123.80	139.10	154.40
61	77.20	89.18	101.16	61.22	71.88	82.52	115.80	131.12	146.42	105.16	119.14	133.10	146.42	165.04	183.68	127.78	143.74	159.72
62	82.52	95.84	109.14	63.88	74.54	85.18	119.80	135.76	151.74	109.14	123.80	138.42	155.74	175.04	194.32	131.78	148.42	165.04
63	86.52	100.50	114.46	67.90	79.20	90.50	129.12	145.76	162.38	115.80	131.12	146.42	162.38	182.36	202.32	138.42	155.74	173.04
64	90.50	105.16	119.80	71.88	83.86	95.84	133.10	150.42	167.70	119.80	135.76	151.74	169.04	189.68	210.30	143.74	162.38	181.02
65	97.18	112.48	127.78	79.86	93.18	106.48	141.08	159.72	178.36	129.12	145.76	162.38	178.36	199.66	220.94	153.08	172.38	191.66
66	110.48	127.12	143.74	90.50	105.16	119.80	157.06	177.04	196.98	141.08	159.72	178.36	201.00	224.30	247.56	166.38	187.02	207.64
67	122.46	141.08	159.72	101.16	117.12	133.10	170.36	191.66	212.96	154.40	174.38	194.32	219.62	244.24	268.86	182.36	204.32	226.28
68	138.42	158.40	178.36	114.46	131.78	149.08	189.00	212.96	236.92	165.04	186.34	207.64	242.24	268.86	295.48	198.34	222.94	247.56
69	149.08	170.36	191.66	126.46	145.76	165.04	204.98	230.28	255.56	177.04	200.34	223.60	264.88	293.50	322.10	214.30	240.26	266.20
70	167.70	191.66	215.62	139.76	160.40	181.02	222.28	249.56	276.84	190.34	214.96	239.58	287.50	318.12	348.72	232.94	261.56	290.16
71	178.36	203.66	228.94	150.42	172.38	194.32	239.58	268.86	298.14	201.00	226.96	252.90	308.80	340.74	372.68	246.24	276.18	306.14
72	191.66	218.28	244.90	165.04	189.00	212.96	252.90	283.52	314.12	214.30	241.58	268.86	331.44	365.38	399.30	262.22	293.50	324.76
73	206.32	234.94	263.54	175.70	201.00	226.28	270.20	302.80	335.42	226.28	255.56	284.84	354.04	390.00	425.92	278.20	312.14	346.06
74	219.62	249.56	279.52	189.00	215.62	242.24	287.50	322.10	356.70	239.58	270.20	300.80	375.34	412.62	449.88	294.16	329.42	364.70
75	234.26	266.20	298.14	203.66	232.28	260.88	304.82	341.42	378.00	250.22	282.18	314.12	399.30	439.24	479.16	314.12	351.38	388.66
76	267.54	302.80	338.08	232.94	264.22	295.48	332.76	372.68	412.62	278.20	313.46	348.72	431.24	473.84	516.42	347.40	388.00	428.58
77	300.80	339.42	378.00	268.86	303.46	338.08	364.70	407.28	449.88	308.80	347.40	386.00	464.54	510.44	556.36	380.66	424.60	468.52
78	334.10	376.02	417.94	303.46	342.08	380.66	392.66	438.58	484.48	335.42	376.68	417.94	500.46	549.72	598.96	415.28	461.86	508.44
79	367.36	412.62	457.86	332.76	374.02	415.28	424.60	474.52	524.42	370.02	415.28	460.52	532.40	584.32	636.22	448.56	498.48	548.38
80				370.02	415.28					396.64	444.56					480.50	533.08	
81				401.96	449.88					427.26	478.50					516.42	572.34	
82				436.56	488.48					459.20	514.44					549.72	608.94	
83				473.84	529.74					491.16	550.38					584.32	646.20	
84				508.44	568.34					524.42	586.98					617.58	682.82	

August 1, 2013

Honorable Jacqueline K. Cunningham  
Commissioner of Insurance  
Virginia Bureau of Insurance  
1300 East Main Street  
Richmond, Virginia 23219

RE: RiverSource Life Insurance Company ("RiverSource Life")  
Company NAIC # 65005  
Company FEIN # 41-0823832  
SERFF Tracking # AERS-12909910  
Policy Form: Long Term Care Policy Form 30160A-VA  
Long Term Care Insurance Endorsement Form 32100

Dear Commissioner Cunningham:

The referenced rate filing is being submitted by RiverSource Life Insurance Company (previously IDS Life Insurance Company) for your review.

30160A-VA, subject to endorsement form 32100, is an existing individual policy form providing benefits for confinement in a nursing home with home care services and was previously approved in 2000. The form, with endorsement, was introduced for all policies with application date May 19, 2000 and later and was issued in Virginia from July 2000 through June 2003, and is no longer being marketed in any state and, outside of Virginia, was last issued in 2003. This rate filing does not apply to policies without the endorsement.

The company is requesting the approval of a premium rate increase of 10% on the above-listed form and all associated riders for policies issued in Virginia with endorsement form 32100. Although a larger premium rate increase is currently supportable, to minimize the impact on policyowners to the extent we can, an increase of only 10% is being requested at this time. Unless emerging experience improves, we believe it likely that additional rate increases will be requested in the future.

As noted in the attached actuarial memorandum, two prior increases have been approved and implemented on this form. A 10% increase was approved in June 2007 and implemented on each contract's next policy anniversary beginning in September 2007. A 10% increase was approved in November 2011 and implemented on each contract's next policy anniversary beginning in March 2012.

As with the prior increase, the company will offer insureds affected by the premium increase the option of reducing their policy benefit to provide flexibility of choice for those insureds who wish to maintain a premium level reasonably similar to what they were paying prior to the rate increase.

If the requested 10% increase is approved, the company will offer insureds a contingent nonforfeiture benefit in accordance with the requirements set forth in 14 VAC 5-200-185.

The following electronic items are included in this submission:

- this cover letter;
- a Rate Revision Checklist;
- a letter from Milliman Inc. describing their involvement and review of this filing; and
- an Actuarial Memorandum and Rate Schedules.

The contact person for this filing is:

Cheryl Meyer  
Senior Contract Analyst  
9550 Ameriprise Financial Center  
Minneapolis, MN 55474  
(612) 671-5583  
[cheryl.d.meyer@ampf.com](mailto:cheryl.d.meyer@ampf.com)

Thank you for your assistance in reviewing this filing.

Respectfully,



Anju Gupta-Lavey, FSA, MAAA  
Actuary  
RiverSource Life Insurance Company

Enclosures



8500 Normandale Lake Blvd.  
Suite 1850  
Minneapolis, MN 55437  
USA

Tel +1 952 897 5300  
Fax +1 952 897 5301

milliman.com

August 1, 2013

To: Virginia Bureau of Insurance

RE: RiverSource Life Insurance Company  
Company NAIC # 65005  
SERFF Tracking # AERS-12909910  
Policy Form: Long Term Care Policy Form 30160A-VA  
Long Term Care Insurance Endorsement Form 32100

Ameriprise Financial, Inc., the parent company of RiverSource Life Insurance Company ("RiverSource Life"), formerly IDS Life Insurance Company, has entered into a service agreement with Milliman, Inc. ("Milliman") effective April 5, 2007, that includes individual long term care rate filing services.

RiverSource Life prepared and submitted the above referenced rate filing in August 2013. Milliman has conducted a high-level review of the cover letter, Rate Revision Checklist, and actuarial memorandum items of this filing and believes them to be in compliance with the applicable laws of this state as indicated in the filing. However, Milliman has not performed any technical checking of the filing for accuracy.

I, Amy Pahl, am a Principal and Consulting Actuary for Milliman, Inc. I am a member of the American Academy of Actuaries and I meet the Qualification Standards of the American Academy of Actuaries to render an actuarial opinion as described herein.

Should you have any questions regarding the above, please feel free to contact me directly at (952) 820-2419 or by email at amy.pahl@milliman.com.

Respectfully,

A handwritten signature in blue ink that reads "Amy Pahl".

Amy Pahl, FSA, MAAA  
Principal and Consulting Actuary

AP/mag

Review Requirements Checklist  
RATE REVISIONS

REVIEW REQUIREMENTS	REFERENCE	COMMENTS
<b>General Filing Requirements</b>		
	14 VAC 5-100-40	<b>For Paper Filings:</b> A letter of transmittal must be submitted in duplicate with each filing.
	14 VAC 5-100-40 6	<b>For Paper Filings:</b> At least one copy of each rate must be included in the filing. A duplicate copy of rates must be submitted if the company wants a "stamped" copy of forms for its records. A stamped self-addressed return envelope is required. The letter of transmittal must be addressed to, State Corporation Commission, Bureau of Insurance, P. O. Box 1157, Richmond, VA 23218.
	14 VAC 5-100-70	When an insurer submits a change of Individual accident and sickness premium rates previously filed with the Bureau of Insurance, the following information must be provided. 1. That the filing is an increase, decrease, or revision of former rate filings and the percentage amounts of such changes. 2. That the claim/earned premium loss ratio and other bases for such increase, decrease, or revision of premium rates. An actuarial memorandum and other relevant material should be attached to the letter of transmittal.
	Administrative Letter 1983-7	The transmittal letter must include the name and NAIC number of the company for which the filing is made.
All Accident and Sickness Forms	14 VAC 5-130-70 A	New Rate Sheet
	14 VAC 5-130-70 B	Actuarial Memorandum
	14 VAC 5-130-70 B 1	A description of the type of policy, including benefits, renewability, and issue age limits.
	14 VAC 5-130-70 B 2	The scope and reason for the rate revision.
	14 VAC 5-130-70 B 3	A comparison of the revised premiums with the current premium scale.
	14 VAC 5-130-70 B 4	A statement of whether the revision applies only to new business, only to in-force business, or to both.
	14 VAC 5-130-70 B 5	The estimated average annual premium per policy, before and after the proposed rate increase.
	14 VAC 5-130-70 B 6	Provide Earned Premiums, paid claims, incurred claims and loss from inception through most recent quarter <sup>1</sup> . Virginia and national experience should be shown separately. Missing experience should be estimated with all estimation assumptions and methodologies
	14 VAC 5-130-70 B 7	Details and dates of all past rate increases on this form.
	14 VAC 5-130-70 B 8	A description of how revised rates were determined, including the general description and source of each assumption used. For expenses, include percent of premium, dollars per policy, and/or dollars per unit of benefit.
	14 VAC 5-130-70 B 9	If the rate revision applies to new business, the anticipated loss ratio and a description of how it was calculated.

Review Requirements Checklist  
RATE REVISIONS

REVIEW REQUIREMENTS	REFERENCE	COMMENTS
	14 VAC 5-130-70 B 10	If the rate revision applies to in-force business provide (a) the anticipated future loss ratio and a description of how it was calculated and (b) the estimated cumulative loss ratio, past and future and a description of how it was calculated.
	14 VAC 5-130-70 B 11	Minimum loss ratio presumed reasonable in 14 VAC 5-130-60 C.
	14 VAC 5-130-70 B 12	If 9, 10a, or 10b is less than 11, supporting documentation for the use of such premiums.
	14 VAC 5-130-70 B 13	The current number of Virginia policyholders and either premiums in force, premiums earned, or premiums collected for such policyholders in the year immediately prior to the filing of the rate increase.
	14 VAC 5-130-70 B 14	Certification by a qualified actuary that, to the best of the actuary's knowledge and judgment, the rate filing is in compliance with applicable laws and regulations of this Commonwealth and the premiums are reasonable in relation to the benefits provided.
	14 VAC 5-130-70 C	Revised rate filings for previously approved forms must demonstrate reasonableness of benefits in relation to premiums.
	14 VAC 5-130-70 C 1	The anticipated loss ratio over the entire period for which the revised rates are computed to provide coverage, and the ratio of the sum of the accumulated benefits from the original effective date of the form to the effective date of the revision and the present value of future benefits to the sum of the accumulated premiums from the original effective date of the form to the effective date of the revision and the present value of future premiums must be at least as great as the standards in 14 VAC 5-130-60 C.
	14 VAC 5-130-70 C 2	Revised premiums for policies issued on or after the effective date of the revision must meet the standards in 14 VAC 5-130-70 C, except the average annual premium shall be determined on actual rather than anticipated distribution of business.
Medicare Supplement Requirements		Applicable requirements for accident and sickness forms in addition to the following.
Standard Medicare Supplement Forms	14 VAC 5-170-120 A 2	All filings of rates and rating schedules shall demonstrate that expected claims in relation to premiums comply with the requirements of this section when combined with actual experience to date. Filings of rate revisions shall also demonstrate that the anticipated loss ratio over the entire future period for which the revised rates are computed to provide coverage can be expected to meet the appropriate loss ratio standards.

Review Requirements Checklist  
RATE REVISIONS

REVIEW REQUIREMENTS	REFERENCE	COMMENTS
Pre-Standardized Medicare Supplement Forms	14 VAC 5-170-120 A 3	<p>For policies issued prior to July 30, 1992, expected claims in relation to premiums shall meet:</p> <ul style="list-style-type: none"> <li>a. The originally filed anticipated loss ratio when combined with the actual experience since inception;</li> <li>b. The appropriate loss ratio requirement from subdivisions 1 a and 1 b of this subsection when combined with actual experience beginning with July 1, 1991, to date; and</li> <li>c. The appropriate loss ratio requirement from subdivisions 1 a and 1 b of this subsection over the entire future period for which the rates are computed to provide coverage.</li> </ul>
Annual Rate and Experience Filing	14 VAC 5-170-120 C	<p>An issuer of Medicare supplement policies and certificates issued before or after July 30, 1992, in this Commonwealth shall file annually its rates, rating schedule, and supporting documentation including ratios of incurred losses to earned premiums by policy duration for approval by the State Corporation Commission in accordance with the filing requirements and procedures prescribed by the State Corporation Commission. The supporting documentation shall also demonstrate in accordance with actuarial standards of practice using reasonable assumptions that the appropriate loss ratio standards can be expected to be met over the entire period for which rates are computed. The demonstration shall exclude active life reserves. An expected third-year loss ratio which is greater than or equal to the applicable percentage shall be demonstrated for policies or certificates in force less than three years.</p>
Actuarial Certification for Medicare Supplement Rate Filings	14 VAC 5-170-120 C	<p>For annual rate and experience filings, an actuarial certificate by a qualified actuary that to the best of the actuary's knowledge and judgment, the following items are true with respect to the filing as follows:</p> <ul style="list-style-type: none"> <li>1. The assumptions present the actuary's best judgment as to the reasonable value for each assumption and are consistent with the issuer's business plan at the time of the filing;</li> <li>2. The anticipated lifetime loss ratio, future loss ratios, and except for policies issued prior to July 30, 1992, third-year loss ratios all exceed the applicable ratio;</li> <li>3. Except for policies issued prior to July 30, 1992, the filed rates maintain the proper relationship between policies which had different rating methodologies;</li> <li>4. The filing was prepared based on the current standards of practices as promulgated by the Actuarial Standards Board, including the data quality standard of practice, as described at <a href="http://www.actuary.org">www.actuary.org</a>;</li> <li>5. The filing is in compliance with the applicable laws and regulations in this Commonwealth; and</li> <li>6. The premiums are reasonable in relation to the benefits provided.</li> </ul>

Review Requirements Checklist  
RATE REVISIONS

REVIEW REQUIREMENTS	REFERENCE	COMMENTS
Actuarial Certification for Medicare Supplement Rate Filings	14 VAC 5-170-130 B	<p>For proposed rate changes, an actuarial certificate by a qualified actuary that the best of the actuary's knowledge and judgment, the following items are true with respect to the filing as follows:</p> <ol style="list-style-type: none"> <li>1. The assumptions present the actuary's best judgment as to the reasonable value for each assumption and are consistent with the issuer's business plan at the time of the filing;</li> <li>2. The anticipated lifetime loss ratio, future loss ratios, and except for policies issued prior to July 30, 1992, third-year loss ratio all exceed the applicable ratio;</li> <li>3. The filing was prepared based on the current standards or practices as promulgated by the Actuarial Standards Board including the data quality standard of practice as described at: <a href="http://www.actuary.org">www.actuary.org</a>;</li> <li>4. The filing is in compliance with applicable laws and regulations in this Commonwealth; and</li> <li>5. The premiums are reasonable in relation to the benefits provided.</li> </ol>
Change in the Rating Structure or Methodology of a Medicare Supplement Form	14 VAC 5-170-130 D 3	<p>A change in the rating structure or methodology shall be considered a discontinuance under subdivision 1 of this subsection unless the issuer complies with the following requirements:</p> <ol style="list-style-type: none"> <li>a. The issuer provides an actuarial memorandum, in a form and manner prescribed by the State Corporation Commission, describing the manner in which the revised rating methodology and resultant rates differ from the existing rating methodology and existing rates.</li> <li>b. The issuer does not subsequently put into effect a change of rates or rating factors that would cause the percentage differential between the discontinued and subsequent rates as described in the actuarial memorandum to change.</li> </ol>

**Access to Administrative Letters, Administrative Orders, Regulations and Laws is available at:**  
<http://www.scc.virginia.gov/boi/laws.aspx>

The Life and Health Division, Forms and Rates Section handles rate revisions. Please contact this section at (804) 371-9110 if you have questions or need additional information about this line of insurance.

Review Requirements Checklist  
RATE REVISIONS

I hereby certify that I have reviewed the attached rate revision filing and determined that it is in compliance with the rate revision checklist.

Signed: Anju Gupta-Lavey

Name (please print): Anju Gupta-Lavey

Company Name: RiverSource Life Insurance Company

Date: August 1, 2013 Phone No: (612) 671-2909 FAX No: (612) 671-3880

E-Mail Address: anju.x.gupta-lavey@ampf.com

<sup>1</sup> Actual and projected experience are based on historical experience through March 31, 2013, which is the most recent data available.

December 3, 2013

Mr. Robert Grissom  
Senior Market Examiner  
Forms and Rates Section  
Life and Health Division  
Virginia Bureau of Insurance  
1300 East Main Street  
Richmond, Virginia 23219

*Via SERFF*

RE: RiverSource Life Insurance Company ("RiverSource Life")  
Company NAIC # 65005  
Company FEIN # 41-0823832  
SERFF Tracking # AERS-12909910  
Policy Form: Long Term Care Policy Form 30160A-VA  
Long Term Care Insurance Endorsement Form 32100

Dear Mr. Grissom:

Thank you for reviewing our filing. This letter is in response to your letter dated August 5, 2013 regarding information needed for the above-referenced filing. The remainder of this letter provides the additional information requested in your August 5, 2013 letter. I restate your requests for additional information in italics for reference.

1. *Has the company addressed all objections raised in the prior rate filing?*

Yes, all objections from the prior 2011 filing were resolved.

2. *Please provide documentation supporting the company's assertion that a 121.8% rate increase is justified.*

The "Overall Percent Change Indicated" was incorrectly entered into SERFF at the time this rate increase filing was submitted; this should have been 95.2%. We have corrected this field on SERFF. The analysis that follows provides support for an overall rate increase of 95.2%.

Table 1 shows the isolated impact on the projected incurred lifetime loss ratio of future deviations in each key driver from original assumptions and the corresponding rate increase needed to produce an incurred lifetime loss ratio of 61.0%, which represents the incurred lifetime loss ratio using historical experience combined with projections based on our original pricing assumptions. The incurred lifetime loss ratios in the table below reflect actual historical experience (i.e. only the projection period assumptions vary). Please note that Table 1 has been developed using

nationwide historical experience through March 31, 2013, where actual and projected premiums reflect the accumulated 21% rate increases as approved in Virginia and implemented on all policies from 2007 through 2013 on a nationwide basis, and the incurred lifetime loss ratios correspond to Exhibit VIII of the Actuarial Memorandum provided with the initial submission.

**Table 1**  
**RiverSource Life Insurance Company**  
**Impact on the Incurred Lifetime Loss Ratio of Changing**  
**From Original Pricing to Current Assumptions**  
**Policy Form: 30160A, Subject to Endorsement Form 32100**

Assumptions	Incurred Loss Ratio	Impact on Lifetime Incurred Loss Ratio	Increase Needed to Product a Lifetime Incurred Loss Ratio of 61.0%
Original Pricing Expected Loss Ratio	66.4%	N/A	N/A
Original Pricing Loss Ratio based on Actual Sales	60.1%	N/A	N/A
Historical Experience through 3/31/2013 & Projections with Original Pricing Assumptions	61.0%	N/A	N/A
Historical Experience through 3/31/2013 & Projections with Original Pricing Assumptions except for Current:			
Morbidity	55.2%	-5.8%	-31.7%
Mortality	63.6%	2.6%	13.2%
Lapse	87.9%	26.9%	120.1%
Historical Experience through 3/31/2013 & Projections with All Current Assumptions	82.8%	21.8%	95.2%

Please note that in the above Table 1, the incurred lifetime loss ratio for each changed assumption does not reflect any synergy of the assumptions. As a result, the total impact of all current assumptions on the incurred lifetime loss ratio (i.e. 21.8%) is not equal to the sum of each changed assumption's impact on the incurred lifetime loss ratio (i.e. 23.7% = -5.8% + 2.6% + 26.9%).

As can be seen in Table 1, the assumption with the greatest impact on the need to increase premiums is the lapse assumption. The need for an increase has been mitigated to some extent by actual sales demographics that, based on original pricing assumptions, were more favorable than anticipated. The future increase in premiums, in addition to the cumulative 21% previously approved in Virginia required to bring the incurred lifetime loss ratio to the originally priced target lifetime loss ratio 66.4% based on the combined impact of all current assumptions is 66.0%; however, we have chosen to limit the current rate increase request to 10% to minimize the impact on policyholders to the extent we can.

At the time of the prior 2011 filing, we provided information that demonstrated that an 86.8% rate increase was justifiable (SERFF Tracking #AERS-126909938, response letters dated June 29, 2011 and November 11, 2011). However, we chose to limit the requested rate increase at that time to 10% to minimize the impact on policyholders to the extent that we could.

3. *Please state the lifetime loss ratio anticipated in the original filing and, if applicable, an explanation why the current projected loss ratio is less than the originally anticipated.*

Policy form 30160A with endorsement form 32100 was originally priced with a target lifetime incurred loss ratio of 66.4%, which is lower than the currently anticipated lifetime incurred loss ratios, both with and without the requested increase, for both nationwide and Virginia-specific experience.

4. *Please provide an explanation as to why an additional rate increase is needed and a comparison of the differences in the assumptions used in the prior filing with those actually experienced included.*

Table 1 above shows the isolated impact on the projected lifetime incurred loss ratio of future deviations in each key driver from original assumptions and the corresponding rate increase needed to produce a lifetime incurred loss ratio of 61.0%, which represents the lifetime incurred loss ratio using historical experience combined with projections based on our original pricing assumptions. The lifetime incurred loss ratios in the table below reflect actual historical experience (i.e. only the projection period assumptions vary). Please note that Table 1 has been developed using nationwide historical experience through March 31, 2013, where actual and projected premiums reflect the accumulated 21% rate increases as approved in Virginia and implemented from 2007 through 2013 on a nationwide basis, and the incurred loss ratios correspond to Exhibit VIII of the Actuarial Memorandum provided with the initial submission.

Attachment 1 to this letter provides a comparison of the original pricing assumptions and the current assumptions used in this filing for mortality, lapses, morbidity and interest, and Attachment 2 provides the assumptions used in the prior 2011 filing.

5. *If the experience develops as projected, or close to it, will the company request additional rate increases?*

While the company currently has no formal plan to seek additional nationwide increases on this policy form, we believe that three (or possibly more) additional 10% increases would likely be requested in the future beyond the level currently being requested nationwide, even if current best estimates for key assumptions are realized in future years. If experience deteriorates from the current best estimates, we might pursue additional increases beyond that level.

6. *Provide a separate calculation of the Lifetime Loss Ratio so that the historical premium component is restated to what it would be if the proposed premium had been charged (collected) since the forms' introduction.*

Attachment 3 to this letter provides the nationwide experience assuming the proposed Virginia premium rate level (i.e. with cumulative 33.1% increase) from inception, while Attachment 4 provides corresponding information for Virginia-specific experience. Please note that RiverSource Life does not consider Virginia-specific experience to be fully credible but is providing it as generally requested.

7. *Please provide sufficient detail or documentation provided so that any projections can be recreated. Excel file that shows all calculations should be provided where applicable.*

Enclosed with this letter is a Microsoft Excel spreadsheet with the information shown in Exhibits VIII and IX of the Actuarial Memorandum provided with the initial submission, as well as Attachments 3 and 4 of this letter.

The anticipated earned premiums and claims in Exhibits VIII and IX and Attachments 3 and 4 are projected using an external projection model. Starting with the actual business inforce as of March 31, 2013, we project each policy on a seriatim basis, applying assumptions for morbidity, mortality and lapse, as shown in Exhibit I of the Actuarial Memorandum.

The projected earned premiums for each policy in Exhibit VIII are based on the premium inforce at the time of projection, adjusted to reflect the cumulative 21% rate increases as previously approved in Virginia and implemented on a nationwide basis, and the projected earned premium for each policy in Exhibit IX are based on the actual premium inforce at the time of projection. The projected earned premium for each policy in Attachments 3 and 4 are based on the premium inforce at the time of projection, adjust to reflect the cumulative 33.1% proposed increase from inception.

The projected paid and incurred claims for each policy in Exhibits VIII and IX and Attachments 3 and 4 are based on the actual benefit provisions inforce at the time of projection. Claims and deaths are assumed to occur on a monthly basis, while lapses are assumed to occur on policy anniversaries.

The projected policies inforce, earned premiums, paid claims and incurred claims in Exhibits VIII and IX and Attachments 3 and 4 are a summary of the seriatim-level results produced in the projection model and are therefore hard-coded numbers in the Microsoft Excel spreadsheet. The formulas used for determining the loss ratios before and after interest are intact in this file.

8. *Please advise in what states the company has requested rate increases on this block, how the rate changes requested in Virginia compare with those requested in other states, and the current status of the reviews in other states.*

Attachment 5 to this letter provides a list of the 49 states (including the District of Columbia) where this policy form was offered, with the status of all currently requested rate increases as of December 3, 2013 and the history of all previous rate revisions which first began in 2007.

As this attachment shows, the cumulative 33.1% premium increase currently requested in Virginia has been approved in 31 states. We have rate increase requests pending in Hawaii, Idaho, Ohio and Rhode Island to bring premium increases to the cumulative 33.1% currently requested in Virginia, and we will soon be requesting an increase in Arkansas, Florida, Indiana, Kansas, Massachusetts, Minnesota, New Mexico and Texas to bring premium increases to the cumulative 33.1% currently requested in Virginia. We will also soon request a rate increase in Connecticut, Nevada and Vermont to move premiums towards the level currently requested in Virginia. In addition to recently approved rate increase requests, in 2014, the company anticipates requesting a 3.8% rate increase in Georgia to bring premiums to the level currently requested in Virginia. Due to immaterial size, no rate increase is being requested in the District of Columbia at this time.

9. *Please provide an explanation of what steps the company has taken to minimize rate increases on this block of business?*

In light of actual experience since these policy forms were originally priced, the initial premiums have proven to be inadequate. To manage this situation, at least once a year since 1999, we have performed detailed experience analysis and have continued to revise assumptions for our LTC block of business in light of these analyses. Additionally, since 1999, we have performed at least annually a gross premium valuation on our LTC blocks of business. As experience emerged, it became clear that the business was under increasing stress. In 2003, we announced a charge to GAAP income of approximately \$100 million on our LTC blocks in the hope of avoiding the need for rate increases. Unfortunately, experience has continued to deteriorate.

We have taken steps to improve claim experience by reviewing and tightening claim adjudication and care coordination practices where possible. However, since this is a closed block of business, very little outside of a rate increase can be done to alleviate the adverse effects of poor morbidity and lower than previously anticipated lapses and mortality. While increasing policyholder premiums is a very difficult decision to make, we believe it is necessary at this time to sustain this block of business.

10. *Please explain what, if any, margins are included in the proposed rates to ensure that future rate increases will not be needed presuming the experience develops as projected.*

The assumptions used in this rate filing are our current best-estimate assumptions based on actual experience and do not include any provision for profit or contingencies. These assumptions are the same as those used for the 2012 asset adequacy analysis as well as our annual GAAP gross premium valuation.

11. *Provide the anticipated future loss ratio where the numerator is equal to the anticipated incurred claims less the policy reserves, and the denominator is equal to the anticipated future earned premium.*

Anticipated loss ratios calculated with the numerator equal to anticipated incurred claims less policy reserves and the denominator equal to anticipated earned premiums are shown in Attachment 6 to this letter, for both nationwide and Virginia-specific experience.

I, Anju Gupta-Lavey, am an Actuary for RiverSource Life Insurance Company. I am a Member of the American Academy of Actuaries, and I meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained herein.



Mr. Grissom, thank you for working with us to complete this filing in Virginia. Please let me know if you would find additional information helpful or if you have any questions. You can reach me directly at (612) 671-2909 or by email at [anju.x.gupta-lavey@ampf.com](mailto:anju.x.gupta-lavey@ampf.com).

Respectfully,



Anju Gupta-Lavey, FSA, MAAA  
Actuary  
RiverSource Life Insurance Company

- Attachment 1: Comparison of Original Pricing and Current Assumptions
- Attachment 2: Prior 2011 Rate Increase Assumptions
- Attachment 3: Nationwide Projections with Proposed Virginia Premium Levels since Inception
- Attachment 4: Virginia Projections with Proposed Virginia Premium Levels since Inception
- Attachment 5: Status of Long Term Care Filings by State as of December 3, 2013
- Attachment 6: Anticipated Loss Ratio Calculation
- Enclosure: Microsoft Excel Spreadsheet with Exhibits VIII and IX Actuarial Memorandum, and Attachments 3 and 4 of this Response

**Attachment 1**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Original Pricing Assumptions:**

**Mortality:** 1983 Individual Annuitant Mortality Table

**Lapse Rates:**

Duration	Issue Age				
	45	55	65	75	82
1	10%	9%	8%	7%	6%
2	9%	8%	7%	6%	5%
3	8%	7%	6%	5%	4%
4	7%	6%	5%	4%	3%
5	6%	5%	5%	4%	3%
6+	5%	5%	5%	4%	3%

**Morbidity:**

Starting in 1989, RiverSource Life marketed nursing home policies with a zero day prior hospitalization requirement. Using the emerging experience on this business, statistics from the "1985 National Nursing Home Survey" published by the National Center for Health Statistics, and input provided from RiverSource Life's reinsurer, the expected frequencies and severities of claims were developed for nursing home benefits. Incidence rates by issue age and duration were developed to reflect the effects of underwriting on nursing home claims incidence. It was understood that the underwriting process would include an assessment of functional and cognitive abilities if considered appropriate.

Starting in 1990, RiverSource Life also marketed home health care benefit riders. At the time of original pricing, only limited insured experience was available for home health and community care benefits. Therefore the expected claim costs for these benefits were derived from general population data with the assistance of RiverSource Life's reinsurer. Both the incidence rates and the length of home health care usage for the first two years were determined through analysis of the "1982-1984 National Long Term Care Surveys", which polled elderly people who manifested impairments in ADLs. The home health care incidence rates were modified by loading for cognitive impairment as a benefit trigger.

The data from the "1985 National Nursing Home Survey" was used to extrapolate the length of home health care usage after the first two years. Additionally, experience data from continuing care retirement communities was used to verify the claim cost assumptions and to provide guidance in translating general population experience to anticipated insured population experience. Incidence rates by issue age and duration were developed to reflect the effects of underwriting on home health care claims incidence.

Claim costs for the Benefit Increase Options were based on these claim costs with the benefit loaded to reflect the scheduled increases in benefits. The nonforfeiture benefit claim costs were determined by assumptions consistent with those used in establishing premium rates. The above described experience was also used to determine marital discounts.

It should be recognized that considerable judgment was made with respect to expected claim costs, especially for non-institutional benefits. After using all available data, total expected claim costs were developed that represented reasonable estimates of aggregate long term care experience under the applicable underwriting criteria.

The following selection factors were used:

Duration	Issue Age Band			
	40-59	60-69	70-79	80+
1	40%	35%	30%	20%
2	50%	55%	60%	80%
3	55%	60%	75%	100%
4	60%	65%	90%	100%
5	65%	70%	100%	100%
6	70%	75%	100%	100%
7	75%	80%	100%	100%
8	80%	90%	100%	100%
9	90%	100%	100%	100%
10+	100%	100%	100%	100%

**Interest Rate:** 5.0%

**Attachment 1**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Current Assumptions:**

**Mortality:** 1983 Individual Annuitant Mortality Basic Table with selection consistent with experience

<b>Mortality Selection Factors</b>						
Duration	Issue Age Band					
	<58	58-62	63-67	68-72	73-77	78+
1	20%	20%	25%	20%	20%	25%
2	25%	35%	40%	30%	25%	25%
3	35%	45%	45%	40%	40%	40%
4	40%	50%	45%	45%	45%	45%
5	45%	50%	45%	55%	50%	55%
6	50%	50%	55%	55%	60%	60%
7	50%	55%	60%	60%	65%	65%
8	50%	55%	60%	60%	70%	75%
9	50%	55%	65%	70%	75%	85%
10	60%	65%	70%	75%	75%	85%
11	60%	70%	70%	80%	75%	85%
12	60%	70%	70%	80%	90%	90%
13	60%	70%	75%	85%	90%	95%
14	60%	75%	75%	90%	90%	95%
15	60%	75%	80%	90%	95%	95%
16	75%	75%	80%	90%	95%	100%
17	75%	75%	80%	95%	100%	100%
18	75%	75%	80%	95%	100%	100%
19	75%	80%	80%	95%	100%	100%
20	75%	80%	90%	95%	100%	100%
21	75%	80%	90%	100%	100%	100%
22	80%	85%	90%	100%	100%	100%
23	80%	85%	95%	100%	100%	100%
24	85%	90%	95%	100%	100%	100%
25	90%	90%	100%	100%	100%	100%
26	90%	90%	100%	100%	100%	100%
27	90%	90%	100%	100%	100%	100%
28	90%	95%	100%	100%	100%	100%
29	90%	95%	100%	100%	100%	100%
30	90%	100%	100%	100%	100%	100%
31	90%	100%	100%	100%	100%	100%
32	95%	100%	100%	100%	100%	100%
33	95%	100%	100%	100%	100%	100%
34	95%	100%	100%	100%	100%	100%
35+	100%	100%	100%	100%	100%	100%

**Attachment 1**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Current Assumptions (continued):**

**Lapse Rates:**

Duration	Lifetime Benefit		
	Issue Age Band		
	<63	63-72	73+
1	6.9%	6.8%	7.0%
2	6.5%	4.5%	3.5%
3	4.8%	3.5%	3.5%
4	3.6%	2.6%	1.9%
5	2.6%	1.9%	1.3%
6	1.9%	1.6%	1.3%
7	1.5%	1.1%	1.3%
8	1.1%	1.1%	1.3%
9	1.1%	1.1%	1.3%
10	0.8%	1.1%	1.3%
11	0.7%	0.9%	1.4%
12	0.7%	0.9%	1.5%
13	0.7%	0.9%	1.5%
14	0.7%	0.9%	1.6%
15	0.7%	0.9%	1.6%
16	0.7%	1.0%	1.7%
17	0.7%	1.1%	1.7%
18	0.7%	1.2%	1.8%
19	0.7%	1.2%	1.8%
20	0.8%	1.2%	1.9%
21	0.8%	1.3%	1.9%
22	0.8%	1.3%	2.0%
23	0.8%	1.4%	2.0%
24	0.9%	1.4%	2.0%
25	0.9%	1.4%	2.0%
26	0.9%	1.4%	2.0%
27	1.0%	1.4%	2.0%
28	1.0%	1.4%	2.0%
29	1.0%	1.4%	2.0%
30	1.0%	1.4%	2.0%
31	1.1%	1.4%	2.0%
32	1.1%	1.4%	2.0%
33	1.1%	1.4%	2.0%
34	1.1%	1.4%	2.0%
35	1.1%	1.4%	2.0%
36+	1.1%	1.4%	2.0%

Duration	Non-Lifetime Benefit		
	Issue Age Band		
	<63	63-72	73+
1	6.9%	7.1%	5.3%
2	6.0%	4.8%	4.6%
3	4.2%	3.3%	3.1%
4	3.1%	2.9%	2.9%
5	2.3%	2.0%	2.2%
6	1.7%	1.9%	2.1%
7	1.5%	1.6%	2.3%
8	1.2%	1.4%	2.5%
9	1.2%	1.3%	2.7%
10	1.0%	1.3%	3.4%
11	1.0%	1.5%	3.9%
12	0.9%	1.5%	4.0%
13	0.8%	1.5%	4.4%
14	0.8%	1.5%	4.8%
15	0.7%	1.6%	4.9%
16	0.7%	1.8%	5.4%
17	0.8%	2.0%	5.4%
18	0.8%	2.2%	5.4%
19	0.9%	2.4%	5.4%
20	0.9%	2.6%	5.4%
21	0.9%	2.8%	5.4%
22	0.9%	3.0%	5.4%
23	1.0%	3.2%	5.4%
24	1.2%	3.4%	5.4%
25	1.4%	3.6%	5.4%
26	1.5%	3.8%	5.4%
27	1.6%	4.0%	5.4%
28	2.1%	4.0%	5.4%
29	2.4%	4.0%	5.4%
30	2.6%	4.0%	5.4%
31	2.9%	4.0%	5.4%
32	3.1%	4.0%	5.4%
33	3.2%	4.0%	5.4%
34	3.3%	4.0%	5.4%
35	3.4%	4.0%	5.4%
36+	3.5%	4.0%	5.4%

**Attachment 1**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Forms:** 30240-VA and 30240-VA1

**Current Assumptions (continued)**

**Lapse Rates:**

Duration	Lifetime Benefit			Duration	Non-Lifetime Benefit		
	Issue Age Band				Issue Age Band		
	<63	63-72	73+		<63	63-72	73+
1	6.9%	6.8%	7.0%	1	6.9%	7.1%	5.3%
2	6.5%	4.5%	3.5%	2	6.0%	4.8%	4.6%
3	4.8%	3.5%	3.5%	3	4.2%	3.3%	3.1%
4	3.6%	2.6%	1.9%	4	3.1%	2.9%	2.9%
5	2.6%	1.9%	1.3%	5	2.3%	2.0%	2.2%
6	1.9%	1.6%	1.3%	6	1.7%	1.9%	2.1%
7	1.5%	1.1%	1.3%	7	1.5%	1.6%	2.3%
8	1.1%	1.1%	1.3%	8	1.2%	1.4%	2.5%
9	1.1%	1.1%	1.3%	9	1.2%	1.3%	2.7%
10	0.8%	1.1%	1.3%	10	1.0%	1.3%	3.4%
11	0.7%	0.9%	1.4%	11	1.0%	1.5%	3.9%
12	0.7%	0.9%	1.5%	12	0.9%	1.5%	4.0%
13	0.7%	0.9%	1.5%	13	0.8%	1.5%	4.4%
14	0.7%	0.9%	1.6%	14	0.8%	1.5%	4.8%
15	0.7%	0.9%	1.6%	15	0.7%	1.6%	4.9%
16	0.7%	1.0%	1.7%	16	0.7%	1.8%	5.4%
17	0.7%	1.1%	1.7%	17	0.8%	2.0%	5.4%
18	0.7%	1.2%	1.8%	18	0.8%	2.2%	5.4%
19	0.7%	1.2%	1.8%	19	0.9%	2.4%	5.4%
20	0.8%	1.2%	1.9%	20	0.9%	2.6%	5.4%
21	0.8%	1.3%	1.9%	21	0.9%	2.8%	5.4%
22	0.8%	1.3%	2.0%	22	0.9%	3.0%	5.4%
23	0.8%	1.4%	2.0%	23	1.0%	3.2%	5.4%
24	0.9%	1.4%	2.0%	24	1.2%	3.4%	5.4%
25	0.9%	1.4%	2.0%	25	1.4%	3.6%	5.4%
26	0.9%	1.4%	2.0%	26	1.5%	3.8%	5.4%
27	1.0%	1.4%	2.0%	27	1.6%	4.0%	5.4%
28	1.0%	1.4%	2.0%	28	2.1%	4.0%	5.4%
29	1.0%	1.4%	2.0%	29	2.4%	4.0%	5.4%
30	1.0%	1.4%	2.0%	30	2.6%	4.0%	5.4%
31	1.1%	1.4%	2.0%	31	2.9%	4.0%	5.4%
32	1.1%	1.4%	2.0%	32	3.1%	4.0%	5.4%
33	1.1%	1.4%	2.0%	33	3.2%	4.0%	5.4%
34	1.1%	1.4%	2.0%	34	3.3%	4.0%	5.4%
35	1.1%	1.4%	2.0%	35	3.4%	4.0%	5.4%
36+	1.1%	1.4%	2.0%	36+	3.5%	4.0%	5.4%

In the year of rate increase notification to policyholders, an additional 2.0% of inforce policyholders is assumed to lapse, and a 0.8% reduction in benefits due to election of reduced benefit options is also assumed.

**Attachment 1**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Current Assumptions (continued):**

**Morbidity:** Expected Claim Costs are the product of original pricing expected claim costs and an actual-to-expected adjustment factor. Actual-to-expected adjustment factors were developed from actual emerging experience through anniversaries ending December 2011. Morbidity used in the projections has also been reduced by 5% for anticipated improved claim experience from changes in claim management starting in 2003.

**Lifetime Benefit Actual-to-Expected Adjustment Factors**

Duration	Age at Issue						
	<53	53-57	58-62	63-67	68-72	73-77	78+
1	0.10	0.35	0.35	0.40	0.45	1.20	1.70
2	0.10	0.35	0.35	0.45	0.50	1.25	1.70
3	0.10	0.35	0.35	0.45	0.60	1.25	1.70
4	0.10	0.35	0.35	0.95	0.80	1.30	1.70
5	0.10	0.35	0.35	0.95	0.90	1.30	1.70
6	0.10	0.35	0.35	0.95	1.00	1.35	1.70
7	0.15	0.35	0.40	0.95	1.15	1.40	1.70
8	0.15	0.35	0.50	0.90	1.15	1.35	1.70
9	0.15	0.35	0.60	0.95	1.15	1.45	1.70
10	0.15	0.35	0.60	0.95	1.15	1.50	1.70
11	0.15	0.35	0.65	0.95	1.15	1.50	1.70
12	0.25	0.40	0.65	0.95	1.15	1.50	1.70
13	0.30	0.45	0.70	1.00	1.15	1.50	1.70
14	0.30	0.50	0.75	1.00	1.15	1.50	1.70
15	0.30	0.50	0.75	1.00	1.15	1.50	1.70
16	0.30	0.55	0.75	1.00	1.15	1.50	1.70
17	0.35	0.60	0.80	1.05	1.15	1.50	1.70
18	0.35	0.65	0.80	1.05	1.15	1.50	1.70
19	0.35	0.70	0.80	1.05	1.15	1.60	1.70
20	0.45	0.75	0.85	1.05	1.15	1.60	1.70
21	0.50	0.80	0.85	1.05	1.15	1.60	1.80
22	0.55	0.85	0.85	1.05	1.15	1.70	1.80
23	0.60	0.85	0.90	1.05	1.15	1.70	1.80
24	0.65	0.85	0.90	1.05	1.15	1.70	1.90
25	0.70	0.85	0.90	1.05	1.15	2.00	1.90
26	0.75	0.85	0.95	1.05	1.15	2.00	1.90
27	0.80	0.85	0.95	1.05	1.15	2.10	2.00
28	0.80	0.85	1.00	1.05	1.15	2.10	2.00
29	0.90	0.90	1.00	1.05	1.15	2.10	2.00
30	0.90	0.95	1.05	1.05	1.15	2.10	2.00
31	0.90	0.98	1.08	1.05	1.15	2.10	2.03
32	0.94	0.98	1.08	1.05	1.15	2.10	2.03
33	0.94	0.98	1.08	1.05	1.15	2.10	2.03
34	1.00	0.98	1.08	1.05	1.15	2.10	2.03
35+	1.00	1.00	1.10	1.05	1.15	2.10	2.05

**Attachment 1**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Current Assumptions (continued):**

**Morbidity (continued):**

**Non-Lifetime Benefit Actual-to-Expected Adjustment Factors**

Duration	Age at Issue								
	<48	48-52	53-57	58-62	63-67	68-72	73-77	78-82	83+
1	0.10	0.10	0.10	0.20	0.20	0.45	0.65	0.70	1.50
2	0.10	0.10	0.10	0.25	0.30	0.45	0.85	0.90	1.60
3	0.15	0.15	0.15	0.30	0.35	0.55	1.05	0.90	1.70
4	0.20	0.20	0.20	0.40	0.35	0.80	1.15	1.10	2.15
5	0.25	0.25	0.25	0.45	0.45	0.80	1.40	1.40	2.15
6	0.30	0.30	0.35	0.50	0.60	1.00	1.40	1.85	2.15
7	0.30	0.30	0.40	0.55	0.75	1.05	1.45	2.05	2.15
8	0.30	0.30	0.45	0.60	0.85	1.15	1.55	2.30	2.15
9	0.35	0.35	0.55	0.75	0.95	1.20	1.70	2.60	2.20
10	0.40	0.40	0.55	0.80	1.00	1.25	1.70	2.60	2.20
11	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
12	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
13	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
14	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
15	0.45	0.45	0.55	0.95	1.05	1.25	1.75	2.65	2.20
16	0.45	0.45	0.55	0.95	1.05	1.25	1.75	2.65	2.20
17	0.50	0.50	0.60	0.95	1.05	1.25	1.75	2.65	2.20
18	0.50	0.50	0.65	0.95	1.05	1.25	1.75	2.65	2.20
19	0.55	0.55	0.70	0.95	1.05	1.25	1.80	2.65	2.20
20	0.55	0.55	0.80	0.95	1.05	1.25	1.80	2.65	2.20
21	0.60	0.60	0.80	0.95	1.05	1.25	1.80	2.70	2.20
22	0.60	0.60	0.85	0.95	1.05	1.25	1.80	2.70	2.20
23	0.65	0.65	0.85	1.00	1.05	1.25	1.80	2.70	2.20
24	0.65	0.65	0.90	1.00	1.05	1.25	1.90	2.70	2.20
25	0.70	0.70	0.90	1.00	1.05	1.25	1.90	2.70	2.20
26	0.75	0.75	0.95	1.00	1.05	1.25	1.90	2.70	2.20
27	0.80	0.80	0.95	1.00	1.05	1.25	1.90	2.70	2.20
28	0.85	0.85	1.00	1.00	1.05	1.25	1.90	2.70	2.20
29	0.90	0.90	1.00	1.05	1.05	1.25	2.00	2.70	2.20
30	0.90	0.90	1.00	1.05	1.05	1.25	2.00	2.70	2.20
31	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
32	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
33	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
34	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
35+	1.00	1.00	1.00	1.05	1.10	1.25	2.00	2.70	2.20

**Interest Rate:** 5.0%

**Attachment 2**  
**RiverSource Life Insurance Company**  
**Prior 2011 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2011 Rate Increase Filing Assumptions:**

**Mortality:** 1983 Individual Annuitant Mortality Basic Table with selection consistent with experience

<b>Mortality Selection Factors</b>						
Duration	Issue Age Band					
	<58	58-62	63-67	68-72	73-77	78+
1	20%	20%	25%	20%	20%	25%
2	25%	35%	40%	30%	25%	25%
3	35%	45%	45%	45%	40%	35%
4	40%	50%	45%	45%	45%	35%
5	45%	50%	45%	55%	50%	55%
6	50%	50%	55%	55%	60%	60%
7	55%	55%	60%	60%	65%	65%
8	55%	55%	60%	60%	70%	75%
9	55%	55%	70%	75%	75%	85%
10	55%	65%	70%	80%	75%	85%
11	65%	70%	70%	80%	75%	85%
12	65%	70%	70%	80%	85%	90%
13	65%	70%	75%	85%	95%	100%
14	65%	75%	75%	90%	95%	100%
15	70%	75%	75%	90%	95%	100%
16	70%	75%	85%	90%	95%	100%
17	70%	75%	85%	90%	100%	100%
18	75%	75%	85%	90%	100%	100%
19	85%	75%	85%	95%	100%	100%
20	85%	80%	90%	100%	100%	100%
21	85%	85%	90%	100%	100%	100%
22	85%	85%	90%	100%	100%	100%
23	85%	85%	95%	100%	100%	100%
24	85%	90%	95%	100%	100%	100%
25	90%	90%	100%	100%	100%	100%
26	90%	90%	100%	100%	100%	100%
27	90%	90%	100%	100%	100%	100%
28	90%	95%	100%	100%	100%	100%
29	90%	95%	100%	100%	100%	100%
30	90%	100%	100%	100%	100%	100%
31	90%	100%	100%	100%	100%	100%
32	95%	100%	100%	100%	100%	100%
33	95%	100%	100%	100%	100%	100%
34	95%	100%	100%	100%	100%	100%
35+	100%	100%	100%	100%	100%	100%

**Attachment 2**  
**RiverSource Life Insurance Company**  
**Prior 2011 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2011 Rate Increase Filing Assumptions**

**Lapse Rates:**

<b>Lifetime Benefit</b>			
<b>Duration</b>	<b>Issue Age Band</b>		
	<b>&lt;63</b>	<b>63-72</b>	<b>73+</b>
1	6.8%	6.7%	6.8%
2	6.4%	4.4%	3.4%
3	4.7%	3.5%	3.4%
4	3.6%	2.6%	1.9%
5	2.6%	1.9%	1.3%
6	1.6%	1.7%	1.3%
7	1.4%	1.1%	1.3%
8	1.0%	1.1%	1.3%
9	1.0%	1.1%	1.3%
10	0.8%	1.0%	1.3%
11	0.7%	0.9%	1.4%
12	0.7%	0.9%	1.5%
13	0.7%	0.9%	1.5%
14	0.7%	0.9%	1.6%
15	0.7%	0.9%	1.6%
16	0.7%	1.0%	1.7%
17	0.7%	1.1%	1.8%
18	0.7%	1.2%	1.8%
19	0.7%	1.2%	1.8%
20	0.8%	1.2%	1.8%
21	0.8%	1.3%	1.8%
22	0.8%	1.3%	1.8%
23	0.8%	1.4%	1.8%
24	0.9%	1.4%	1.8%
25	0.9%	1.4%	1.8%
26	0.9%	1.4%	1.8%
27	1.0%	1.4%	1.8%
28	1.0%	1.4%	1.8%
29	1.0%	1.4%	1.8%
30	1.0%	1.4%	1.8%
31	1.1%	1.4%	1.8%
32	1.1%	1.4%	1.8%
33	1.1%	1.4%	1.8%
34	1.1%	1.4%	1.8%
35	1.1%	1.4%	1.8%
36+	1.1%	1.4%	1.8%

<b>Non-Lifetime Benefit</b>			
<b>Duration</b>	<b>Issue Age Band</b>		
	<b>&lt;63</b>	<b>63-72</b>	<b>73+</b>
1	6.9%	7.1%	5.4%
2	6.0%	4.9%	4.6%
3	4.2%	3.4%	3.1%
4	3.1%	2.9%	2.9%
5	2.4%	2.0%	2.3%
6	1.8%	1.8%	2.3%
7	1.4%	1.6%	2.4%
8	1.2%	1.3%	2.6%
9	1.2%	1.3%	2.8%
10	1.1%	1.3%	3.5%
11	1.0%	1.4%	4.0%
12	0.9%	1.4%	4.2%
13	0.8%	1.4%	4.4%
14	0.8%	1.5%	4.7%
15	0.8%	1.6%	4.9%
16	0.8%	1.8%	5.1%
17	0.8%	2.0%	5.3%
18	0.8%	2.2%	5.4%
19	0.9%	2.4%	5.4%
20	0.9%	2.6%	5.4%
21	0.9%	2.8%	5.4%
22	0.9%	3.0%	5.4%
23	1.0%	3.2%	5.4%
24	1.2%	3.4%	5.4%
25	1.4%	3.6%	5.4%
26	1.5%	3.8%	5.4%
27	1.6%	4.0%	5.4%
28	2.1%	4.0%	5.4%
29	2.4%	4.0%	5.4%
30	2.6%	4.0%	5.4%
31	2.9%	4.0%	5.4%
32	3.1%	4.0%	5.4%
33	3.2%	4.0%	5.4%
34	3.3%	4.0%	5.4%
35	3.4%	4.0%	5.4%
36+	3.5%	4.0%	5.4%

**Attachment 2**  
**RiverSource Life Insurance Company**  
**Prior 2011 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2011 Rate Increase Filing Assumptions (cont):**

**Morbidity:** Expected Claim Costs are the product of original pricing expected claim costs and an actual-to-expected adjustment factor. Morbidity used in the projections has also been reduced by 5% for anticipated improved claim experience from changes in claim management starting in 2003. Actual-to-expected adjustment factors were developed from actual emerging experience through anniversaries ending December 2009.

**Lifetime Benefit Actual-to-Expected Adjustment Factors**

Duration	Age at Issue							
	<48	48-52	53-57	58-62	63-67	68-72	73-77	78+
1	0.10	0.10	0.20	0.20	0.30	0.30	1.05	1.45
2	0.08	0.10	0.25	0.25	0.30	0.30	1.05	1.45
3	0.07	0.10	0.30	0.30	0.30	0.30	1.05	1.45
4	0.07	0.10	0.30	0.30	0.95	1.00	1.05	1.60
5	0.06	0.10	0.30	0.30	0.95	1.00	1.05	1.60
6	0.06	0.10	0.30	0.30	0.95	1.00	1.05	1.60
7	0.07	0.10	0.30	0.30	0.95	1.00	1.05	1.60
8	0.07	0.25	0.35	0.40	0.95	1.05	1.20	1.60
9	0.07	0.30	0.35	0.40	0.95	1.05	1.25	1.60
10	0.07	0.30	0.35	0.50	0.95	1.15	1.25	1.60
11	0.07	0.30	0.35	0.55	0.95	1.15	1.25	1.60
12	0.07	0.30	0.40	0.60	0.95	1.15	1.25	1.60
13	0.20	0.35	0.40	0.65	0.95	1.15	1.25	1.60
14	0.27	0.35	0.40	0.70	0.95	1.15	1.25	1.60
15	0.30	0.35	0.50	0.75	0.95	1.15	1.25	1.60
16	0.30	0.35	0.55	0.80	0.95	1.15	1.25	1.60
17	0.30	0.40	0.60	0.85	0.95	1.15	1.25	1.60
18	0.35	0.40	0.65	0.85	0.95	1.15	1.25	1.60
19	0.35	0.40	0.70	0.85	0.95	1.15	1.25	1.60
20	0.35	0.50	0.75	0.85	0.95	1.15	1.25	1.60
21	0.35	0.55	0.80	0.90	1.00	1.15	1.30	1.60
22	0.40	0.60	0.85	0.90	1.00	1.15	1.30	1.60
23	0.40	0.65	0.85	0.90	1.00	1.15	1.30	1.60
24	0.40	0.70	0.85	0.95	1.00	1.15	1.30	1.60
25	0.50	0.75	0.85	0.95	1.00	1.15	1.30	1.60
26	0.55	0.80	0.85	1.00	1.00	1.15	1.30	1.60
27	0.60	0.85	0.85	1.00	1.00	1.15	1.30	1.60
28	0.65	0.85	0.85	1.00	1.00	1.15	1.30	1.60
29	0.70	0.85	0.90	1.00	1.00	1.15	1.30	1.60
30	0.75	0.85	0.95	1.00	1.00	1.15	1.30	1.60
31	0.80	0.90	1.00	1.00	1.00	1.15	1.30	1.60
32	0.85	0.90	1.00	1.00	1.00	1.15	1.30	1.60
33	0.85	0.95	1.00	1.00	1.00	1.15	1.30	1.60
34	0.85	0.95	1.00	1.00	1.00	1.15	1.30	1.60
35	0.85	1.00	1.00	1.00	1.00	1.15	1.30	1.60
36	0.90	1.00	1.00	1.00	1.00	1.15	1.30	1.60
37	0.90	1.00	1.00	1.00	1.00	1.15	1.30	1.60
38	0.95	1.00	1.00	1.00	1.00	1.15	1.30	1.60
39	0.95	1.00	1.00	1.00	1.00	1.15	1.30	1.60
40+	1.00	1.00	1.00	1.00	1.00	1.15	1.30	1.60

**Attachment 2**  
**RiverSource Life Insurance Company**  
**Prior 2011 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2011 Rate Increase Filing Assumptions (cont):**

**Morbidity (continued):**

**Non-Lifetime Benefit Actual-to-Expected Adjustment Factors**

Duration	Age at Issue								
	<48	48-52	53-57	58-62	63-67	68-72	73-77	78-82	83+
1	0.10	0.10	0.10	0.25	0.25	0.50	0.50	0.50	1.25
2	0.08	0.15	0.15	0.25	0.25	0.50	0.65	0.75	1.25
3	0.07	0.15	0.15	0.40	0.35	0.60	0.65	0.75	1.45
4	0.07	0.15	0.15	0.40	0.35	0.60	0.65	0.75	2.00
5	0.06	0.15	0.15	0.40	0.35	0.60	1.30	0.75	2.00
6	0.06	0.15	0.35	0.45	0.65	1.10	1.30	1.50	2.00
7	0.10	0.15	0.35	0.45	0.85	1.10	1.30	1.60	2.00
8	0.10	0.25	0.35	0.60	0.90	1.25	1.30	1.70	2.00
9	0.10	0.25	0.35	0.70	1.00	1.25	1.30	1.70	2.00
10	0.10	0.25	0.35	0.70	1.05	1.25	1.30	1.70	2.00
11	0.11	0.30	0.35	0.70	1.05	1.25	1.30	1.70	2.00
12	0.11	0.30	0.40	0.70	1.05	1.25	1.30	1.70	2.00
13	0.20	0.30	0.40	0.70	1.05	1.25	1.30	1.70	2.00
14	0.23	0.30	0.40	0.70	1.05	1.25	1.30	1.70	2.00
15	0.25	0.30	0.40	0.80	1.05	1.25	1.30	1.70	2.00
16	0.30	0.30	0.60	0.80	1.05	1.25	1.30	1.70	2.00
17	0.30	0.40	0.60	0.80	1.05	1.25	1.30	1.70	2.00
18	0.30	0.40	0.60	0.80	1.05	1.25	1.30	1.70	2.00
19	0.30	0.40	0.60	0.85	1.05	1.25	1.30	1.70	2.00
20	0.30	0.40	0.80	1.00	1.05	1.25	1.30	1.70	2.00
21	0.30	0.60	0.80	1.00	1.05	1.25	1.30	1.70	2.00
22	0.40	0.60	0.80	1.00	1.05	1.25	1.30	1.70	2.00
23	0.40	0.60	0.80	1.00	1.05	1.25	1.30	1.70	2.00
24	0.40	0.60	0.85	1.00	1.05	1.25	1.30	1.70	2.00
25	0.40	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
26	0.60	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
27	0.60	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
28	0.60	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
29	0.60	0.85	1.00	1.00	1.05	1.25	1.30	1.70	2.00
30	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
31	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
32	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
33	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
34	0.85	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
35+	1.00	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00

**Interest Rate:** 5.0%

**Attachment 3**  
**RiverSource Life Insurance Company**  
**Nationwide Experience Projections**  
**Experience with Premiums Restated to Proposed Virginia Premium Level since Inception\***  
**Policy Form: 30160A, Subject to Endorsement Form 32100**

	Calendar Year	Loss Ratio Demonstration						Interest Rate Factors	
		Without Interest			With Interest			Calendar Year	Mid-Year
		Earned Premiums	Incurred Claims	Loss Ratio	Earned Premiums	Incurred Claims	Loss Ratio	Effective Int Rate	Disc / Accum Factor
Historical Experience	2000	4,416,266	0	0.0%	8,226,571	0	0.0%	5.00%	1.8628
	2001	35,745,900	532,170	1.5%	63,416,241	944,114	1.5%	5.00%	1.7741
	2002	64,185,470	1,768,456	2.8%	108,448,036	2,987,990	2.8%	5.00%	1.6896
	2003	77,306,731	1,501,573	1.9%	124,397,878	2,416,251	1.9%	5.00%	1.6091
	2004	73,341,008	4,625,087	6.3%	112,396,618	7,088,042	6.3%	5.00%	1.5325
	2005	70,916,159	6,717,009	9.5%	103,505,225	9,803,767	9.5%	5.00%	1.4595
	2006	69,119,986	6,149,015	8.9%	96,079,650	8,547,386	8.9%	5.00%	1.3900
	2007	67,783,771	11,983,945	17.7%	89,735,481	15,864,934	17.7%	5.00%	1.3238
	2008	65,264,932	9,197,398	14.1%	82,286,590	11,596,158	14.1%	5.00%	1.2608
	2009	63,287,239	15,802,209	25.0%	75,993,426	18,974,820	25.0%	5.00%	1.2008
	2010	61,792,360	13,923,349	22.5%	70,665,161	15,922,611	22.5%	5.00%	1.1436
	2011	60,320,129	19,255,214	31.9%	65,696,697	20,971,506	31.9%	5.00%	1.0891
	2012	58,903,637	21,092,077	35.8%	61,098,997	21,878,187	35.8%	5.00%	1.0373
	1/2013-3/2013	14,271,464	5,334,530	37.4%	14,358,768	5,367,163	37.4%	5.00%	1.0061
Projected Future Experience	4/2013-12/2013	42,418,259	17,712,219	41.8%	41,649,218	17,391,097	41.8%	5.00%	0.9819
	2014	55,020,121	25,735,749	46.8%	51,764,845	24,213,089	46.8%	5.00%	0.9408
	2015	53,229,738	28,236,802	53.0%	47,695,609	25,301,110	53.0%	5.00%	0.8960
	2016	51,396,003	30,856,949	60.0%	43,859,545	26,332,238	60.0%	5.00%	0.8534
	2017	49,508,929	33,864,539	68.4%	40,237,317	27,522,676	68.4%	5.00%	0.8127
	2018	47,570,528	37,054,966	77.9%	36,820,879	28,681,549	77.9%	5.00%	0.7740
	2019	45,593,047	40,575,112	89.0%	33,609,766	29,910,702	89.0%	5.00%	0.7372
	2020	43,576,304	44,652,053	102.5%	30,593,416	31,348,662	102.5%	5.00%	0.7021
	2021	41,519,454	49,063,511	118.2%	27,761,307	32,805,519	118.2%	5.00%	0.6686
	2022	39,429,776	53,543,713	135.8%	25,108,646	34,096,317	135.8%	5.00%	0.6368
	2023	37,316,306	58,190,560	155.9%	22,631,239	35,290,858	155.9%	5.00%	0.6065
	2024	35,171,603	62,856,903	178.7%	20,314,800	36,305,579	178.7%	5.00%	0.5776
	2025	32,985,934	67,346,486	204.2%	18,145,121	37,046,401	204.2%	5.00%	0.5501
	2026	30,772,298	71,879,096	233.6%	16,121,362	37,656,885	233.6%	5.00%	0.5239
	2027	28,565,869	76,259,961	267.0%	14,252,791	38,049,510	267.0%	5.00%	0.4989
	2028	26,384,538	80,649,629	305.7%	12,537,550	38,323,535	305.7%	5.00%	0.4752
	2029	24,228,931	85,180,045	351.6%	10,964,988	38,548,879	351.6%	5.00%	0.4526
	2030	22,105,414	89,293,951	403.9%	9,527,594	38,486,342	403.9%	5.00%	0.4310
	2031	20,036,250	92,405,851	461.2%	8,224,542	37,931,041	461.2%	5.00%	0.4105
	2032	18,033,941	93,858,699	520.5%	7,050,122	36,692,772	520.5%	5.00%	0.3909
	2033	16,113,861	93,963,776	583.1%	5,999,517	34,984,620	583.1%	5.00%	0.3723
	2034	14,295,367	93,285,411	652.6%	5,069,005	33,078,143	652.6%	5.00%	0.3546
	2035	12,590,697	92,145,065	731.9%	4,251,947	31,117,892	731.9%	5.00%	0.3377
	2036	11,001,547	89,981,186	817.9%	3,538,365	28,940,132	817.9%	5.00%	0.3216
	2037	9,533,781	86,554,600	907.9%	2,920,281	26,512,437	907.9%	5.00%	0.3063
	2038	8,199,727	82,170,063	1002.1%	2,392,046	23,970,871	1002.1%	5.00%	0.2917
	2039	7,000,982	77,291,317	1104.0%	1,945,091	21,473,934	1104.0%	5.00%	0.2778
	2040	5,932,924	71,983,933	1213.3%	1,569,858	19,047,026	1213.3%	5.00%	0.2646
	2041	4,989,131	66,367,713	1330.2%	1,257,266	16,724,732	1330.2%	5.00%	0.2520
	2042	4,162,238	60,572,025	1455.3%	998,941	14,537,345	1455.3%	5.00%	0.2400
	2043	3,444,125	54,722,484	1588.9%	787,232	12,508,047	1588.9%	5.00%	0.2286
	2044	2,826,111	48,939,218	1731.7%	615,210	10,653,478	1731.7%	5.00%	0.2177
	2045	2,299,155	43,315,278	1884.0%	476,665	8,980,204	1884.0%	5.00%	0.2073
	2046	1,854,055	37,942,378	2046.5%	366,082	7,491,699	2046.5%	5.00%	0.1974
	2047	1,481,664	32,886,815	2219.6%	278,623	6,184,268	2219.6%	5.00%	0.1880
	2048	1,173,097	28,199,213	2403.8%	210,093	5,050,265	2403.8%	5.00%	0.1791
	2049	919,903	23,915,222	2599.8%	156,903	4,079,081	2599.8%	5.00%	0.1706
	2050	714,204	20,048,809	2807.2%	116,017	3,256,771	2807.2%	5.00%	0.1624
	2051	548,784	16,606,238	3026.0%	84,901	2,569,097	3026.0%	5.00%	0.1547
	2052	417,146	13,584,593	3256.6%	61,462	2,001,551	3256.6%	5.00%	0.1473
2053	313,527	10,968,268	3498.4%	43,995	1,539,107	3498.4%	5.00%	0.1403	
2054	232,884	8,738,278	3752.2%	31,123	1,167,797	3752.2%	5.00%	0.1336	
2055	170,864	6,865,353	4018.0%	21,747	873,806	4018.0%	5.00%	0.1273	
2056	123,753	5,316,601	4296.1%	15,001	644,461	4296.1%	5.00%	0.1212	
2057	88,425	4,056,262	4587.2%	10,208	468,273	4587.2%	5.00%	0.1154	
2058	62,286	3,046,905	4891.8%	6,848	334,999	4891.8%	5.00%	0.1099	
2059	43,214	2,250,340	5207.5%	4,525	235,637	5207.5%	5.00%	0.1047	
2060	29,496	1,631,959	5532.9%	2,941	162,748	5532.9%	5.00%	0.0997	
2061	19,777	1,159,466	5862.7%	1,878	110,122	5862.7%	5.00%	0.0950	
2062	13,001	805,147	6192.8%	1,176	72,829	6192.8%	5.00%	0.0905	
	Past	786,655,052	117,882,030	15.0%	1,076,305,338	142,362,929	13.2%		
	Future	855,458,968	2,318,530,709	271.0%	552,105,605	970,706,134	175.8%		
	Lifetime	1,642,114,020	2,436,412,739	148.4%	1,628,410,944	1,113,069,063	68.4%		

\* Proposed Virginia rate schedule reflects a cumulative rate increase of 21% from two rate increases of 10% and 10% plus requested 10% increase

**Attachment 4**  
**RiverSource Life Insurance Company**  
**Virginia Experience Projections**  
**Experience with Premiums Restated to Proposed Virginia Premium Level since Inception\***  
**Policy Form: 30160A-VA, Subject to Endorsement Form 32100**

	Calendar Year	Loss Ratio Demonstration						Interest Rate Factors	
		Without Interest			With Interest			Calendar Year	Mid-Year
		Earned Premiums	Incurred Claims	Loss Ratio	Earned Premiums	Incurred Claims	Loss Ratio	Effective Int Rate	Disc / Accum Factor
Historical Experience	2000	207,298	0	0.0%	386,153	0	0.0%	5.00%	1.8628
	2001	1,646,751	0	0.0%	2,921,474	0	0.0%	5.00%	1.7741
	2002	2,993,230	197,175	6.6%	5,057,375	333,147	6.6%	5.00%	1.6896
	2003	3,733,656	0	0.0%	6,008,001	0	0.0%	5.00%	1.6091
	2004	3,585,484	341,115	9.5%	5,494,829	522,766	9.5%	5.00%	1.5325
	2005	3,515,089	807,612	23.0%	5,130,426	1,178,745	23.0%	5.00%	1.4595
	2006	3,460,424	18,486	0.5%	4,810,133	25,696	0.5%	5.00%	1.3900
	2007	3,439,097	518,237	15.1%	4,552,846	686,067	15.1%	5.00%	1.3238
	2008	3,301,014	406,287	12.3%	4,161,947	512,251	12.3%	5.00%	1.2608
	2009	3,249,814	638,998	19.7%	3,902,280	767,289	19.7%	5.00%	1.2008
	2010	3,199,247	100,840	3.2%	3,658,629	115,319	3.2%	5.00%	1.1436
	2011	3,157,160	330,945	10.5%	3,438,570	360,444	10.5%	5.00%	1.0891
	2012	3,112,916	698,942	22.5%	3,228,936	724,992	22.5%	5.00%	1.0373
1/2013-3/2013	757,293	273,905	36.2%	761,926	275,581	36.2%	5.00%	1.0061	
Projected Future Experience	4/2013-12/2013	2,274,805	771,564	33.9%	2,233,563	757,575	33.9%	5.00%	0.9819
	2014	2,964,978	1,139,965	38.4%	2,789,555	1,072,518	38.4%	5.00%	0.9408
	2015	2,885,384	1,276,521	44.2%	2,585,399	1,143,806	44.2%	5.00%	0.8960
	2016	2,802,979	1,418,251	50.6%	2,391,964	1,210,286	50.6%	5.00%	0.8534
	2017	2,717,070	1,587,317	58.4%	2,208,240	1,290,058	58.4%	5.00%	0.8127
	2018	2,627,525	1,773,122	67.5%	2,033,775	1,372,445	67.5%	5.00%	0.7740
	2019	2,534,746	1,980,560	78.1%	1,868,535	1,460,007	78.1%	5.00%	0.7372
	2020	2,438,529	2,223,862	91.2%	1,712,007	1,561,297	91.2%	5.00%	0.7021
	2021	2,338,886	2,494,467	106.7%	1,563,858	1,667,885	106.7%	5.00%	0.6686
	2022	2,236,089	2,773,863	124.0%	1,423,928	1,766,379	124.0%	5.00%	0.6368
	2023	2,130,348	3,060,507	143.7%	1,291,993	1,856,108	143.7%	5.00%	0.6065
	2024	2,021,033	3,358,750	166.2%	1,167,330	1,939,983	166.2%	5.00%	0.5776
	2025	1,907,584	3,650,778	191.4%	1,049,336	2,008,244	191.4%	5.00%	0.5501
	2026	1,790,690	3,952,565	220.7%	938,128	2,070,717	220.7%	5.00%	0.5239
	2027	1,672,366	4,246,163	253.9%	834,418	2,118,601	253.9%	5.00%	0.4989
	2028	1,553,703	4,549,020	292.8%	738,297	2,161,628	292.8%	5.00%	0.4752
	2029	1,434,803	4,857,063	338.5%	649,331	2,198,101	338.5%	5.00%	0.4526
	2030	1,316,230	5,148,713	391.2%	567,305	2,219,133	391.2%	5.00%	0.4310
	2031	1,199,318	5,389,845	449.4%	492,300	2,212,441	449.4%	5.00%	0.4105
	2032	1,084,838	5,527,712	509.5%	424,103	2,160,983	509.5%	5.00%	0.3909
	2033	973,860	5,576,798	572.6%	362,588	2,076,355	572.6%	5.00%	0.3723
	2034	867,673	5,584,436	643.6%	307,669	1,980,189	643.6%	5.00%	0.3546
	2035	767,146	5,559,797	724.7%	259,069	1,877,574	724.7%	5.00%	0.3377
	2036	672,621	5,464,347	812.4%	216,331	1,757,466	812.4%	5.00%	0.3216
	2037	584,582	5,284,354	904.0%	179,063	1,618,644	904.0%	5.00%	0.3063
	2038	503,972	5,040,246	1000.1%	147,020	1,470,354	1000.1%	5.00%	0.2917
	2039	431,047	4,759,142	1104.1%	119,758	1,322,238	1104.1%	5.00%	0.2778
	2040	365,660	4,445,302	1215.7%	96,754	1,176,232	1215.7%	5.00%	0.2646
	2041	307,552	4,103,936	1334.4%	77,503	1,034,196	1334.4%	5.00%	0.2520
	2042	256,390	3,744,610	1460.5%	61,534	898,710	1460.5%	5.00%	0.2400
	2043	211,782	3,375,558	1593.9%	48,407	771,559	1593.9%	5.00%	0.2286
	2044	173,280	3,007,504	1735.6%	37,721	654,697	1735.6%	5.00%	0.2177
	2045	140,396	2,646,928	1885.3%	29,107	548,766	1885.3%	5.00%	0.2073
	2046	112,613	2,300,336	2042.7%	22,235	454,200	2042.7%	5.00%	0.1974
	2047	89,399	1,973,283	2207.3%	16,811	371,070	2207.3%	5.00%	0.1880
2048	70,219	1,671,028	2379.8%	12,576	299,268	2379.8%	5.00%	0.1791	
2049	54,553	1,396,543	2560.0%	9,305	238,200	2560.0%	5.00%	0.1706	
2050	41,906	1,151,297	2747.4%	6,807	187,019	2747.4%	5.00%	0.1624	
2051	31,816	935,897	2941.6%	4,922	144,790	2941.6%	5.00%	0.1547	
2052	23,863	749,568	3141.1%	3,516	110,441	3141.1%	5.00%	0.1473	
2053	17,673	591,387	3346.2%	2,480	82,986	3346.2%	5.00%	0.1403	
2054	12,918	459,546	3557.4%	1,726	61,414	3557.4%	5.00%	0.1336	
2055	9,314	351,541	3774.2%	1,185	44,743	3774.2%	5.00%	0.1273	
2056	6,621	264,497	3994.7%	803	32,062	3994.7%	5.00%	0.1212	
2057	4,638	195,740	4220.2%	535	22,597	4220.2%	5.00%	0.1154	
2058	3,200	142,306	4447.1%	352	15,646	4447.1%	5.00%	0.1099	
2059	2,173	101,576	4674.3%	228	10,636	4674.3%	5.00%	0.1047	
2060	1,452	71,091	4897.6%	145	7,090	4897.6%	5.00%	0.0997	
2061	953	48,778	5119.3%	90	4,633	5119.3%	5.00%	0.0950	
2062	614	32,764	5337.7%	56	2,964	5337.7%	5.00%	0.0905	
Past		39,358,475	4,332,542	11.0%	53,513,524	5,502,297	10.3%		
Future		48,671,785	132,210,745	271.6%	30,989,663	53,524,935	172.7%		
Lifetime		88,030,260	136,543,287	155.1%	84,503,186	59,027,232	69.9%		

\* Proposed Virginia rate schedule reflects a cumulative rate increase of 21% from two rate increases of 10% and 10% plus requested 10% increase

**Attachment 5**  
**RiverSource Life Insurance Company**  
**Status of Long Term Care Rate Filings as of December 3, 2013**  
**Policy Form: 30160A, Subject to Endorsement Form 32100**

State	Initial Nationwide Request			Follow-Up to Initial Request			Second Nationwide Request			Third Nationwide Request				Cumulative Rate Increases Approved	Annualized Premium as of March 31, 2013
	Date of Approval	Rate Increase	Rate Increase Effective Date	Date of Approval	Rate Increase	Rate Increase Effective Date	Date of Approval	Rate Increase	Rate Increase Effective Date	Date of Submission	Date of Approval	Rate Increase	Rate Increase Effective Date		
Alabama	6/19/2007	10.0%	9/1/2007				8/9/2011	10.0%	1/1/2012	11/12/2012	11/20/2012	10.0%	4/1/2013	33.1%	552,256
Alaska <sup>1</sup>	4/4/2007	10.0%	9/1/2007				Not Required	10.0%	5/1/2011	Not Required	Not Required	10.0%	4/1/2013	33.1%	22,812
Arizona	6/7/2007	7.5%	9/1/2007				8/25/2011	12.6%	1/1/2012	6/25/2011	7/23/2013	10.0%	11/1/2013	33.1%	630,991
Arkansas	3/25/2008	10.0%	6/1/2008											10.0%	269,775
Colorado	5/3/2007	10.0%	9/1/2007				7/25/2011	10.0%	10/1/2011	6/11/2013	8/8/2013	10.0%	TBD	33.1%	650,912
Connecticut	12/14/2007	5.0%	3/1/2008											5.0%	1,517,316
Delaware	7/2/2007	10.0%	10/1/2007				8/4/2011	10.0%	11/1/2011	1/28/2013	3/6/2013	10.0%	6/1/2013	33.1%	257,826
District of Columbia		Not Filing												0.0%	61,160
Florida	10/18/2007	10.0%	1/1/2008											10.0%	3,334,179
Georgia	7/2/2007	6.0%	10/1/2007	7/29/2008	3.8%	11/1/2008	2/16/2011	6.0%	5/1/2011	1/14/2013	1/16/2013	9.9%	4/1/2013	28.2%	1,097,006
Hawaii	5/6/2008	10.0%	8/1/2008				11/3/2011	10.0%	2/1/2012	6/11/2013				21.0%	794,773
Idaho	9/4/2007	10.0%	12/1/2007				5/12/2011	10.0%	8/1/2011	6/4/2013				21.0%	156,891
Illinois	9/12/2007	10.0%	12/1/2007				3/29/2011	10.0%	7/1/2011	11/7/2012	10/25/2013	10.0%	2/1/2014	33.1%	1,923,850
Indiana	4/11/2010	10.0%	7/1/2010				4/10/2013	10.0%	7/1/2013					21.0%	466,284
Iowa <sup>3</sup>	2/5/2008	10.0%	5/1/2008				4/26/2011	10.0%	8/1/2011	12/4/2012	4/3/2013	10.0%	7/1/2013	33.1%	1,026,091
Kansas	10/26/2007	10.0%	2/1/2008											10.0%	646,097
Kentucky	6/14/2007	10.0%	10/1/2007				2/14/2011	10.0%	5/1/2011	1/28/2013	4/23/2013	10.0%	8/1/2013	33.1%	520,157
Louisiana	9/7/2007	10.0%	5/1/2008				11/9/2011	10.0%	2/1/2012	7/1/2013	11/7/2013	10.0%	2/1/2014	33.1%	572,317
Maine	3/28/2007	10.0%	9/1/2007				6/20/2011	10.0%	10/1/2011	7/18/2013	9/17/2013	10.0%	12/1/2013	33.1%	702,572
Maryland	9/25/2007	10.0%	1/1/2008				7/15/2011	10.0%	1/1/2012	1/18/2013	6/5/2013	10.0%	9/1/2013	33.1%	1,840,524
Massachusetts	6/1/2012	10.0%	10/1/2012											10.0%	2,350,159
Michigan	4/9/2007	10.0%	9/1/2007				12/18/2010	10.0%	5/1/2011	11/28/2012	12/4/2012	10.0%	4/1/2013	33.1%	2,679,849
Minnesota <sup>3</sup>	8/9/2007	10.0%	11/1/2007				3/9/2011	10.0%	6/1/2011					21.0%	1,844,738
Mississippi	7/18/2007	10.0%	10/1/2007				3/1/2011	10.0%	6/1/2011	2/27/2013	4/22/2013	10.0%	8/1/2013	33.1%	173,976
Missouri	5/2/2007	10.0%	9/1/2007				2/17/2011	10.0%	5/1/2011	12/12/2012	5/7/2013	10.0%	8/1/2013	33.1%	840,259
Montana	8/8/2007	10.0%	11/1/2007				1/14/2011	10.0%	5/1/2011	2/7/2013	2/21/2013	10.0%	6/1/2013	33.1%	168,432
Nebraska	6/25/2007	10.0%	10/1/2007				5/11/2011	10.0%	8/1/2011	12/12/2012	2/14/2013	10.0%	5/1/2013	33.1%	592,373
Nevada		Not Yet Submitted												0.0%	371,706
New Hampshire	5/25/2007	10.0%	9/1/2007				6/12/2011	10.0%	9/1/2011	2/7/2013	4/19/2013	10.0%	8/1/2013	33.1%	681,342
New Jersey <sup>2</sup>	6/19/2007	10.0%	9/1/2007				8/9/2011	10.0%	1/1/2012	11/12/2012	12/4/2012	10.0%	4/1/2013	33.1%	2,437,128
New Mexico	7/23/2007	10.0%	11/1/2007											10.0%	142,076
North Carolina <sup>3</sup>	8/1/2007	10.0%	11/1/2007				3/10/2011	10.0%	6/1/2011	11/20/2012	6/26/2013	10.0%	10/1/2013	33.1%	1,290,595
North Dakota	3/27/2007	10.0%	9/1/2007				2/1/2011	10.0%	5/1/2011	1/29/2013	3/11/2013	10.0%	6/1/2013	33.1%	254,485
Ohio	6/21/2007	10.0%	9/1/2007				3/17/2011	10.0%	6/1/2011	12/3/2012				21.0%	2,495,110
Oklahoma <sup>3</sup>	8/21/2008	10.0%	11/1/2008				9/15/2011	10.0%	1/1/2012	7/23/2013	9/16/2013	10.0%	12/1/2013	33.1%	242,686
Oregon	4/23/2007	10.0%	9/1/2007				8/15/2011	10.0%	1/1/2012	7/17/2013	11/18/2013	10.0%	2/1/2014	33.1%	1,028,936
Pennsylvania <sup>3</sup>	9/17/2007	10.0%	12/1/2007				3/21/2011	10.0%	6/1/2011	2/7/2013	5/6/2013	10.0%	8/1/2013	33.1%	2,752,652
Rhode Island	2/28/2008	10.0%	6/1/2008				10/24/2011	10.0%	2/1/2012	6/6/2013				21.0%	241,166
South Carolina	5/21/2007	10.0%	9/1/2007				3/10/2011	10.0%	6/1/2011	12/13/2012	3/22/2013	10.0%	7/1/2013	33.1%	656,748
South Dakota <sup>3</sup>	9/28/2007	10.0%	1/1/2008				12/23/2010	10.0%	5/1/2011	11/28/2012	1/28/2013	10.0%	5/1/2013	33.1%	228,139
Tennessee	4/30/2007	10.0%	9/1/2007				1/14/2011	10.0%	5/1/2011	2/7/2013	4/8/2013	10.0%	7/1/2013	33.1%	1,277,763
Texas <sup>3</sup>	10/29/2007	10.0%	2/1/2008				9/9/2011	10.0%	12/1/2011					21.0%	2,593,433
Utah	11/14/2007	10.0%	2/1/2008				3/17/2011	10.0%	6/1/2011	6/13/2013	10/7/2013	10.0%	1/1/2014	33.1%	332,552
Vermont		Not Yet Submitted												0.0%	170,831
Virginia	6/21/2007	10.0%	9/1/2007				11/26/2011	10.0%	3/1/2012	8/1/2013				21.0%	2,784,003
Washington	8/6/2007	10.0%	11/1/2007	10/20/2008	10.0%	1/1/2009	5/2/2011	10.0%	8/1/2011	6/19/2013	10/23/2013	15.0%	2/1/2014	53.1%	1,419,906
West Virginia	5/3/2007	10.0%	9/1/2007				3/18/2011	10.0%	6/1/2011	5/24/2013	8/23/2013	10.0%	11/1/2013	33.1%	248,368
Wisconsin	6/27/2007	10.0%	10/1/2007				3/17/2011	10.0%	6/1/2011	12/10/2012	2/6/2013	10.0%	6/1/2013	33.1%	1,033,369
Wyoming	3/13/2007	10.0%	9/1/2007				1/28/2011	10.0%	5/1/2011	6/6/2013	6/13/2013	10.0%	9/1/2013	33.1%	60,529
Illinois <sup>4</sup>	9/12/2007	10.0%	12/1/2007				3/29/2011	10.0%	7/1/2011					21.0%	64,243
Iowa <sup>4</sup>		Not Filing - Rate Stability Policies												0.0%	1,036,643
Minnesota <sup>4</sup>		Not Filing - Rate Stability Policies												0.0%	1,036,643
North Carolina <sup>4</sup>	8/1/2007	10.0%	11/1/2007											10.0%	28,597
Oklahoma <sup>4</sup>		Not Filing - Rate Stability Policies												0.0%	183,429
Pennsylvania <sup>4</sup>		Not Filing - Rate Stability Policies												0.0%	394,829
South Dakota <sup>4</sup>	9/28/2007	10.0%	1/1/2008											10.0%	22,330
Texas <sup>4</sup>		Not Filing - Rate Stability Policies												0.0%	759,382

<sup>1</sup> Alaska does not require long term care rates to be filed before use.  
<sup>2</sup> Group policies, submitted and filed in Alabama where trustee is located.  
<sup>3</sup> Pre-Rate Stability policies only, pursuant to regulations of specific state.  
<sup>4</sup> Rate Stability policies only, pursuant to regulations of specific state.

**Attachment 6**  
**RiverSource Life Insurance Company**  
**Anticipated Loss Ratio Calculation With Statutory Active Life Reserve**

**Nationwide Experience**  
**Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis**

**Policy Form: 30160A, Subject to Endorsement Form 32100**  
**With No Increase**

<b>1</b>	Present Value of Future Incurred Claims:	969,110,681
<b>2</b>	3/31/2013 Statutory Active Life Reserves:	509,102,992
<b>3</b>	Present Value of Future Premiums:	501,914,187
<b>Anticipated Loss Ratio = (1 - 2) / 3</b>		<b>91.7%</b>

**Policy Form: 30160A, Subject to Endorsement Form 32100**  
**With 20% Increase**

<b>1</b>	Present Value of Future Incurred Claims:	970,706,134
<b>2</b>	3/31/2013 Statutory Active Life Reserves:	509,102,992
<b>3</b>	Present Value of Future Premiums:	545,935,809
<b>Anticipated Loss Ratio = (1 - 2) / 3</b>		<b>84.6%</b>

**Virginia Experience**  
**Using Actual History**

**Policy Form: 30160A-VA, Subject to Endorsement Form 32100**  
**With No Increase**

<b>1</b>	Present Value of Future Incurred Claims:	53,443,496
<b>2</b>	3/31/2013 Statutory Active Life Reserves:	27,930,486
<b>3</b>	Present Value of Future Premiums:	28,172,420
<b>Anticipated Loss Ratio = (1 - 2) / 3</b>		<b>90.6%</b>

**Policy Form: 30160A-VA, Subject to Endorsement Form 32100**  
**With 20% Increase**

<b>1</b>	Present Value of Future Incurred Claims:	53,524,935
<b>2</b>	3/31/2013 Statutory Active Life Reserves:	27,930,486
<b>3</b>	Present Value of Future Premiums:	30,659,243
<b>Anticipated Loss Ratio = (1 - 2) / 3</b>		<b>83.5%</b>

February 19, 2014

Ms. Janet Houser  
Virginia Bureau of Insurance  
1300 East Main Street  
Richmond, Virginia 23219

*Via SERFF*

RE: RiverSource Life Insurance Company ("RiverSource Life")  
Company NAIC # 65005  
Company FEIN # 41-0823832  
SERFF Tracking # AERS-12909910  
Policy Form: Long Term Care Policy Form 30160A-VA  
Long Term Care Insurance Endorsement Form 32100

Dear Ms. Houser:

Thank you for reviewing our filing. This letter is in response to your letter dated January 14, 2014 regarding information needed for the above-referenced filing. The remainder of this letter provides the additional information requested in your January 14, 2014 letter. I restate your requests for additional information in italics for reference.

- 1. Before rates may be approved, please complete the attached Rate Summary. This form is now required for Long Term Care rate filings. Our expectation is that the form would put into consumer friendly language a clear explanation of the justification for the rate increase. This should be fairly high level and not drill down deep into the details but at least explain to the consumer the assumptions and changes that are driving the need for an increase.*

Enclosed with this letter is the completed Rate Summary form, including the following explanation of the justification for this rate increase.

"Premium rates are being raised on all policies issued under this policy form to offset anticipated claims that are higher than previously expected. The company periodically reviews anticipated claims and other experience for its long-term care business. A request for this increase was filed with the Virginia Bureau of Insurance and included the necessary actuarial data to support the increase based on the company's current view of its experience."

- 2. Please provide a copy of the premium rate increase letter that will be sent to the policyholders and/or a list of FAQs that it will make available to its customer service representatives in anticipation of calls from consumers.*

*If approved, please explain what, if any, options will be offered to the policyholders in lieu of accepting the rate increase. Should options be made available, please be aware prior to approving the proposed rate increase, forms used to amend existing coverage will need to be filed for review and approval. If forms are not already approved, this can either be done as a separate filing or the company can amend this filing to include it. Any submitted form will need to comply with the filing requirements of Chapter 100 of the Virginia Administrative Code. If the forms are already approved, please provide the form number as approved in Virginia, the SERFF tracking number and date of its approval.*

Enclosed with this letter are sample copies of the current policyholder notification letters and FAQ that will be sent to affected policyholders prior to implementation of the requested rate increase. Please note that, in the future, slight variations in letter language may occur that do not materially change the information being provided to the policyholder.

Each policyholder will receive a policyholder notification letter approximately 60 days prior to the effective date of the increase, explaining the premium rate increase and several alternative options to lessen or eliminate the additional financial outlay that would otherwise result. In particular, the policyholders will be given the option to:

1. Lower the daily benefit amount;
2. Increase the elimination period;
3. Decrease the benefit period;
4. Reduce the home care coverage amount;
5. Eliminate the inflation rider – however, most of the policies are in later durations, so offering the option to eliminate the inflation rider may not be beneficial to all policyholders. Therefore, the option is not explicitly offered to the policyholders but will be considered if requested.

If the policyholder chooses to change the daily benefit amount, if applicable, the new daily benefit amount is calculated by multiplying the current daily benefit amount by the ratio of the current premium over the revised premium based on original issue age, rounded to the higher dollar.

Most of the policies are in later durations, so offering the option to eliminate the inflation riders may not be beneficial to all policyholders. Therefore, the option is not explicitly offered to the policyholders but will be considered if requested.

Any changes in coverage on the home care coverage amount, benefit period, elimination period or inflation options are determined such that the revised premium, which is based on the new benefit elections and original issue age, is similar to the desired premium level.

If the policyholder chooses to reduce the benefits, he / she needs to complete and sign the Long-Term Care Coverage Change Request Form 291524-VA, which was approved in Virginia on May 1, 2012 (SERFF Tracking # AERS-128075059) and is included with the notification letter, and mail it to RiverSource Life.

After we have received the completed form, we will make the necessary policy changes and send a confirmation in writing that we have received and processed the request along with a revised schedule of benefits which would replace the schedule of benefits included on page 3 of the original policy. The revised schedule of benefits is identical to the schedule of benefits included with this policy form when originally approved on October 2, 1997.

- 3. Please refer to Administrative Letter 2012-03, copy attached, which requires all submissions to include certain specific information in the Filing Description section. Please note that a transmittal letter attached as supporting documentation no longer fulfills this requirement. This change will need to be made in future filings or they will be rejected.*

We will ensure that we meet the additional filing requirements described Administrative Letter 2012-03 for any future filings.

- 4. The Actuarial Certification indicates premiums are reasonable to the benefits provided in 14 VAC 5-130-70(C). Please be aware that 14 VAC5-200-150 B states benefits under individual long term care insurance policies shall be deemed reasonable in relation to premiums provided the expected loss ratio is at least 60% calculated in a manner which provides for adequate reserving of the long-term care insurance risk. The regulation then provides what factors should be considered. Please amend the certification accordingly.*

Enclosed with this letter is a revised actuarial memorandum with the actuarial certification updated to state "The premiums are reasonable in relation to the benefits based on the loss ratio standards set forth in 14 VAC 5-200-150(B)."

I, Anju Gupta-Lavey, am an Actuary for RiverSource Life Insurance Company. I am a Member of the American Academy of Actuaries, and I meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained herein.



Ms. Houser, thank you for working with us to complete this filing in Virginia. Please let me know if you would find additional information helpful or if you have any questions. You can reach me directly at (612) 671-2909 or by email at [anju.x.gupta-lavey@ampf.com](mailto:anju.x.gupta-lavey@ampf.com).

RiverSource Life Insurance Company  
RiverSource Distributors, Inc.  
9550 Ameriprise Financial Center  
Minneapolis, MN 55474



Respectfully,

A handwritten signature in black ink that reads "Anju Gupta-Lavey". The signature is written in a cursive, flowing style.

Anju Gupta-Lavey, FSA, MAAA  
Actuary  
RiverSource Life Insurance Company

Enclosure:        Sample Policyholder Notification Letters and FAQ  
                         Rate Summary Form  
                         Revised Actuarial Memorandum

**Frequently Asked Questions for RiverSource Life Insurance Company (RiverSource Life)  
and RiverSource Life Insurance Co. of New York (RiverSource Life of NY)  
In-Force Long-Term Care Policyowners Affected by the Recent Rate Increase**

**Q1: Is this a bill?**

A: No, this notice is not a bill. This notice does provide important information regarding your upcoming Long Term Care premiums.

**Q2: Why are my premiums going up?**

A: Premiums are going up on the block of policies similar to yours due to anticipated claims that are higher than expected. It is important that premiums collected by an insurance company bear a relationship to the claims it anticipates paying.

**Q3: Are my rates going up because I filed a claim?**

A: No. In analyzing the need for a rate increase, claims information is reviewed in aggregate. In other words, we look at the claims experience across all policies like yours. This rate increase in no way reflects on any individual claims you may have submitted.

**Q4: But my policy says it is “guaranteed renewable.” How can my rates be going up?**

A: A policy that is guaranteed renewable means that it cannot be canceled because of a change in your health. It also means that rates can only be changed on your policy if they are changed for all other policies like yours. As long as you pay the premium, it cannot be canceled.

**Q5: How do I know that this increase is justified?**

A: Insurance is a heavily regulated industry. In order to implement this rate increase, RiverSource Life is required to file a request for approval with each state insurance regulatory authority. RiverSource Life of NY is required to file a request for approval with the State of New York. Included with our request is the necessary actuarial data to support the increase. If the state insurance regulatory authority agrees with our request, it is then approved and implemented. RiverSource Life and RiverSource Life of NY have filed their requests for an increase. (Note: There are a handful of states that are not empowered to actually approve a rate increase. However, RiverSource Life and RiverSource Life of NY still provided these states with the same information concerning our need to increase rates for informational purposes.)

**Q6: Will my rates go up again in the future?**

A: Future rate increases are possible on all guaranteed renewable long-term care insurance policies no matter which company issued the policy. However, as indicated above, any future rate increase will require state regulatory approval before it can be implemented. It is possible that you will see additional rate increases in the future.

**Q7: You indicate that there are options available to me to offset this premium increase. What do you mean by that?**

A: At the time you purchased your policy you were presented with several options regarding the exact nature of your benefits under the policy. Your selection of options determined the initial premium that was charged for your policy. In light of this rate increase, you may wish to revisit those options and make an adjustment to your current benefit selections. Doing so could help you lower your premium to a point that it would be comparable to the premium you were paying before the rate increase.

**Q8: What options are available to me to offset this premium increase?**

A: Each block of long-term care insurance policies which RiverSource Life or RiverSource Life of NY sold had different benefit options. Depending on the option(s) you may have chosen when you purchased your policy, you may want to consider a different option. Listed below are options that may be available to you. You will want to refer to your policy for the specific options that are available to you.

1. Current Daily Benefit Amount: This dollar amount represents the maximum daily benefit we will pay according to your policy. Reducing this amount will reduce the amount that we will pay for covered services received and the premium charged for your policy. Keep in mind that your policy may contain other benefit amounts that will be proportionally decreased if you reduce your daily benefit amount.

2. **Elimination Period:** This is the number of days that covered services are provided to you but which must be paid for by you before the policy begins to pay benefits. For example, if your policy has a 20-day elimination period, you must be receiving covered services for 20 days before we start paying benefits for services received on or after the 21<sup>st</sup> day. Increasing the elimination period will reduce your premium.
3. **Benefit Period:** This is the total period of time for which benefits will be paid during the life of the policy. This period is specified on your policy schedule. Reducing the benefit period will reduce your premium. For example, you may want to consider reducing your benefit period from lifetime to four years.
4. **Home Care Coverage:** If you have home care coverage, you may be able to reduce these benefits.

**Q9: Should I let my policy lapse?**

A: Your policy represents a critical component of a sound financial plan. You should always consider one of the options available to reduce your premium before you let this coverage lapse. Please consult with your advisor before making changes to your policy.

**Q10: Will I get a refund if I cancel my policy or let my policy lapse?**

A: No. Much like other types of insurance (i.e. automobile, homeowners, etc.), your policy does not accumulate any cash value so canceling your policy or letting it lapse will not result in any refund to you. If you cancel your policy, the only refund you will receive is a return of any unearned premium that you may have already paid for the period of time between the time you cancel your policy and your next premium due date. You will not be able to receive any refund of premium that has already been earned by the company.

**Q11: Wouldn't it be cheaper for me to get a new policy?**

A: It may or it may not. It's important to keep in mind that obtaining a new policy with any carrier will require your application to be underwritten at your current age and at your current health status. Also, as many carriers have also experienced rate increases on existing blocks of long-term care policies, they are increasing the premiums they charge for new policies as well. If you choose to explore the possibility of obtaining a new policy elsewhere, we believe you will find that your existing policy, even with this premium increase, represents a good value compared with obtaining new coverage at current market rates. *If you are considering a new policy, be sure you have an offer of insurance for the new policy before you drop your existing coverage. If you don't pay the increased premium on your existing policy, your policy will lapse.*

**Q12: Do I have to do anything if I want to keep my benefits the way they are?**

A: No. As long as you continue to pay your premiums, now at the increased rate, when they are due, your policy will remain as it was prior to the rate increase. You only need to take action if you would like to explore the options available to you for reducing your benefits to offset the rate increase.

**Q13: My premium is paid by a credit card or a bank authorization. I'd like to keep my current coverage; what will happen to my premium?**

A: If your premium is currently being paid by a credit card or a bank authorization, the deduction amount will automatically be increased to the new premium amount. You don't need to take any action.

**Q14: My premium is paid by a systematic payout from another Ameriprise Financial account. I'd like to keep my current coverage; what will happen to my premium??**

A: If your premium is currently being paid by a systematic payout from another Ameriprise Financial account, you may need to take action:

- **If taxes are not being withheld**, the payout amount will automatically be increased to the new premium amount. You don't need to take any action.
- **If taxes are being withheld**, the gross payout amount may need to be adjusted. Contact your financial advisor or call us at our service center for more information.

Not all policies are available in all states.

Insurance and annuity products are issued by RiverSource Life Insurance Company and in New York, by RiverSource Life Insurance Co. of New York, Albany, New York. These companies are affiliated with Ameriprise Financial Services, Inc. Only RiverSource Life Insurance Co. of New York is authorized to sell insurance and annuity products in New York.

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290912 E(7/12)

## Sample Rate Increase Notification Letter to Clients On Waiver of Premium

<DATE>

Policy Number:  
<POLICY NUMBER>

<POLICYOWNER NAME>  
<ADDRESS1>  
<ADDRESS2>

### Notice of Premium Rate Increase

Re: RiverSource Life Insurance Company Long Term Care Insurance Policy  
<POLICY NUMBER>

Dear <POLICYOWNER NAME>,

This letter is to inform you that the premium for your long-term care insurance policy will increase effective <EFFECTDATE>, which is your next policy anniversary date.

#### Your premium payments currently waived

While this increase applies to all policies like yours, your premium is currently being waived while you are receiving long-term care benefits from your policy. Your obligation to pay premium on the policy, which includes this increase, won't restart as long as you meet the policy's provisions for having your premium waived.

#### Reasons for this increase

Rates are being raised on all policies like yours to offset anticipated claims that are higher than expected. This premium increase is designed to offset some of these anticipated costs and in no way reflects on the integrity of your policy, nor is it based on your individual claims history, age, health status, or any other personal factor.

As required, we have filed our request for this premium increase with the appropriate insurance regulators. We periodically review anticipated claims and other experience for our long-term care business. Based on our current view, we may request regulatory approval for additional premium increases in the future.

It is important to note the premium on your policy is always subject to change so long as we change the rates for all policies like yours. The provision "We Have the Right to Change Premiums" is on the cover page of your policy.

#### Your new premium

When this increase takes effect, your <PREMMODE> premium payment will increase from \$<OLDPREMAMT> to \$<NEWPREMAMT>, beginning with the premium payment that is due <EFFECTDATE>. As described above, the new premium will only be due if you no longer meet the policy's provisions for having your premium waived.

#### You have options

Please be assured that we remain committed to helping meet your long-term protection needs. When you begin paying premiums again, feel free to contact us to discuss potential options that may offset this premium increase.

**Sample Rate Increase Notification Letter to Clients On Waiver of Premium**

**For more information or assistance, please contact:**

- > your financial advisor, <Advisor Name> <designations>, at <phone number>
- > an Ameriprise Financial client service representative at 1 (866) 863-9497, Monday through Friday, 7 a.m. to 6 p.m. Central time

We value you as a client and look forward to continuing to serve you.

Sincerely,

RiverSource Life Insurance Company

<ADVISOR NUMBER AND NAME>

Insurance and annuity products are issued by RiverSource Life Insurance Company, an affiliate of Ameriprise Financial Services, Inc.

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132107 E(8/13)

## Sample Rate Increase Notification Letter to Clients Not on Waiver of Premium

<DATE>

Policy Number:  
<POLICY NUMBER>

<POLICYOWNER NAME>  
<ADDRESS1>  
<ADDRESS2>

### Notice of Premium Rate Increase

Re: RiverSource Life Insurance Company Long Term Care Insurance Policy  
<POLICY NUMBER>

Dear <POLICYOWNER NAME>,

This letter is to inform you that the premium for your long-term care insurance policy will increase effective <EFFECTDATE>, which is your next policy anniversary date.

#### Reasons for this increase

Rates are being raised on all policies like yours to offset anticipated claims that are higher than expected. This premium increase is designed to offset some of these anticipated costs and in no way reflects on the integrity of your policy, nor is it based on your individual claims history, age, health status, or any other personal factor.

As required, we have filed our request for this premium increase with the appropriate insurance regulators. We periodically review anticipated claims and other experience for our long-term care business. Based on our current view, we may request regulatory approval for additional premium increases in the future.

It is important to note the premium on your policy is always subject to change so long as we change the rates for all policies like yours. The provision "We Have the Right to Change Premiums" is on the cover page of your policy.

#### Your new premium

When this increase takes effect, your <PREMMODE> premium payment will increase from \$<OLDPREMAMT> to \$<NEWPREMAMT>, beginning with the premium payment that is due <EFFECTDATE>. Note that the new premium payment will be processed on your regularly scheduled payment date, which may be on, before or after the <EFFECTDATE> due date.

#### You have options

We remain committed to helping meet your long-term protection needs. Although the premium for your policy is increasing, there are options available to you that may help offset the increase. Because your long-term care policy represents an important piece of a sound financial plan, we urge you to consider these options carefully.

**Keep your benefits as they are:** You can continue your policy in force at the current level of benefits by paying the increased premium.

**Modify your benefits:** You can also modify your benefits to decrease your premium. Please keep in mind that if you reduce your benefits, you cannot increase them in the future.

## Sample Rate Increase Notification Letter to Clients Not on Waiver of Premium

- **Daily Benefit Amount Reduction:** By reducing your current daily benefit amount from \$<NHDBAMT> to \$<ALTDDBAMT>, your <PREMMODE> premium would be \$<ALTPREM>. This is approximately the same rate as your current payment. Keep in mind that your policy may contain other benefit amounts that will decrease proportionally if you reduce your daily benefit amount.
- **Benefit Adjustments:** Adjusting other policy features may also help reduce your premium costs. One example is to lengthen your elimination period, which is the waiting period before benefits begin. Another example is to shorten your overall maximum benefit period.

*(Comment: this statement appears only if the client has Home Care coverage through Rider)*

You may also consider reducing your Home Care coverage benefits.

*(Comment: this statement appears only if the client has a Non-forfeiture option through Rider)*

Because you purchased the Nonforfeiture Benefit Rider, you may also choose to stop paying premium and have a reduced lifetime benefit. Please refer to your policy for details about how this rider works.

*(Comment: this statement appears only if the client is eligible for Contingent Benefit Upon Lapse)*

**Lapsing your policy:** As a result of this premium increase, you are eligible for a contingent nonforfeiture benefit upon lapse. This means that if you stop paying the premium due for your policy within 120 days after the effective date of this premium increase, and as a result your policy lapses for non-payment of premium, your policy will be considered fully paid-up with a reduced lifetime benefit with no further premiums due. In this event, your policy's current daily benefit amount will be locked in at the current level, but the maximum lifetime benefit payable will be reduced to an amount equal to the greater of (1) 100% of the sum of all premiums you have paid for your policy, and (2) 30 times your policy's current nursing home daily benefit amount. Once benefits paid on your policy reach this reduced maximum benefit limit, no additional benefits are payable.

If you pay premiums covering the period more than 120 days after the effective date of this premium increase, you will not be eligible for this benefit unless the premium for your policy increases again.

Please consult with your advisor before you stop paying premiums and reduce your benefit period.

### Carefully consider your options

It is important that you determine which option best suits your individual circumstances and anticipated future needs. Please carefully consider the need and expenses associated with long-term care before you adjust your benefits or decide to forgo this coverage completely. Several documents are enclosed that will assist you in understanding the rate increase and your available options. Read these carefully. Please keep in mind that if you reduce your benefits, you will be unable to increase them in the future.

### Your next step

## Sample Rate Increase Notification Letter to Clients Not on Waiver of Premium

### **If you decide to keep your present coverage**

Should you wish to continue your policy at its current level of benefits at the increased premium, no action other than paying the indicated premium before its due date is required by you at this time.

### **If you decide to modify your coverage**

Please complete the enclosed Long-Term Care Coverage Change Request Form and return it to us. We must receive this form from you no later than <EFFDATE1> to ensure your requested changes are processed before <EFFECTDATE>, when the premium increase for your policy takes effect.

If your Long-Term Care Coverage Change Request Form is not received before <EFFDATE1>, your requested changes may not be processed before the date on which the increased premium is due. You are responsible for paying the full increased premium until your requested benefit change is processed. If a benefit change is processed after the increased premium due date and you paid the increased premium, you will receive a refund for any overpaid premium.

### **For more information or assistance, please contact:**

- > your financial advisor, <Advisor Name>, at <phone number>
- > an Ameriprise Financial client service representative at 1 (866) 863-9497, Monday through Friday, 7 a.m. to 6 p.m. Central time

We value you as a client and look forward to continuing to serve you.

Sincerely,

RiverSource Life Insurance Company

<ADVISOR NUMBER AND NAME>

Insurance and annuity products are issued by RiverSource Life Insurance Company, an affiliate of Ameriprise Financial Services, Inc.

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132106 E(8/13)

**Long-Term Care Coverage Change Request Form**

[October 11, 2012]

[9100-2400000-7 004]

[  
V John Doe  
ADDRESS Line 1>  
City, VA 99999-9999  
]

Dear [V John Doe: ]

You have options to modify your existing coverage to offset the upcoming premium increase on your policy. If you want to elect one of these options, please indicate your choice in the space provided below and return this form in the enclosed postage-paid envelope to:

[  
RiverSource Life Insurance Company  
70100 Ameriprise Financial Center  
P.O. Box 10  
Minneapolis, MN 55440-8902  
]

**If you decide to modify your coverage at this time**

Please complete this Long-Term Care Coverage Change Request Form and return it to us. We must receive this form from you no later than [July 15, 2012] to ensure your requested changes are processed before [August 15, 2012], when the premium increase for your policy takes effect.

If your Long-Term Care Coverage Change Request Form is not received before [July 15, 2012], your requested changes may not be processed before the date on which the increased premium is due. You are responsible for paying the full increased premium until your requested benefit change is processed. If a benefit change is processed after the increased premium due date and you paid the premium, you will receive a refund for any overpaid premium.

Because your long-term care policy represents an important piece of a sound financial plan, we urge you to consider these options carefully. Please keep in mind that if you reduce your benefits, you cannot increase them in the future.

**Your options**

Please indicate your choice by checking one of the options below:

Reduce my current daily benefit amount from [\$125.00] to [\$109.00] which will result in a [annual] premium of [\$2,862.58] beginning with the premium payment that is due [August 15, 2012]. I understand that my policy may contain other benefit amounts that will decrease proportionally if I reduce my daily benefit amount.

[Your Home Care coverage and premium will remain unchanged.]

[The Benefit Increase Option on your policy remains intact and will result in an increase of [\$6.25] in your daily benefit amount in one year.]

291524-VA

The Benefit Increase Option on your policy of 5% per year will remain intact and will continue to increase your daily benefit amount annually.

Because I purchased the Nonforfeiture Benefit Rider, I want to stop paying premiums and have a reduced lifetime benefit, as described in my policy.

Because I am eligible for a contingent nonforfeiture benefit upon lapse, I want to stop paying premiums and have a reduced lifetime benefit equal to the greater of (1) 100% of the sum of all premiums paid over the life of the policy, and (2) 30 times my policy's current nursing home daily benefit amount.

Please make the following change(s) to my policy:

---

---

You will receive a new policy schedule after these changes are processed.

\_\_\_\_\_  
Signature of Policyholder

\_\_\_\_\_  
Date

**For more information or assistance, please contact:**

- > your financial advisor, <Advisor Name>, at (999) 000-9999
- > an Ameriprise Financial client service representative at 1 (866) 863-9497,

We value you as a client and look forward to continuing to serve you.

Sincerely,

RiverSource Life Insurance Company

12345 Advisor Name

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291524-VA

Health Insurance Rate Request Summary  
Part 1 – To Be Completed By Company

Reset Form

Company Name and NAIC Number: RiverSource Life Insurance Company, #65005

SERFF Tracking Number: AERS-129009910

Effective Date: Upon approval

(Projected) Number of Insureds Affected: 1,674

New Rates  
Average Annual Premium Per Member:

Revised Rates  
Average Annual Premium Per Member: \$1,859

Average Requested Percentage Rate Change Per Member: 10%

Minimum Requested Percentage Rate Change Per Member: 10%

Maximum Requested Percentage Rate Change Per Member: 10%

Plans Affected  
(The Form Number and "Product Name")

Form#	"Product Name"(if applicable)
30106A-VA, with endorsement form 32100	

Attach a brief narrative to summarize the key information used to develop the rates including the main drivers for new or revised rates.

This document is intended to help explain the rate filing and it is only a summary of the company's request. It is not intended to describe or include all factors or information considered in the review process. For more detailed information, please refer to the complete filing.

**Narrative: Explanation of Justification of Rate Increase**

Premium rates are being raised on all policies issued under this policy form to offset anticipated claims that are higher than previously expected. The company periodically reviews anticipated claims and other experience for its long-term care business. A request for this increase was filed with the Virginia Bureau of Insurance and included the necessary actuarial data to support the increase based on the company's current view of its experience.

March 4, 2014

Ms. Janet Houser  
Virginia Bureau of Insurance  
1300 East Main Street  
Richmond, Virginia 23219

Via *SERFF*

RE: RiverSource Life Insurance Company ("RiverSource Life")  
Company NAIC # 65005  
Company FEIN # 41-0823832  
SERFF Tracking # AERS-12909910  
Policy Form: Long Term Care Policy Form 30160A-VA  
Long Term Care Insurance Endorsement Form 32100

Dear Ms. Houser:

Thank you for reviewing our filing. This letter is in response to your letter dated February 25, 2014 regarding information needed for the above-referenced filing. The remainder of this letter provides the additional information requested in your February 25, 2014 letter. I restate your requests for additional information in italics for reference.

- 1. Please provide more detail in the policyholder letter regarding the explanation for the rate increase in consumer friendly language. Please keep in mind, as an indemnity policy, the benefit payment remains the same; and for that insured, it would be difficult to understand why higher claim payments would affect his policy. According to the Actuarial Memorandum, the driving forces behind the rate increase are that morbidity is higher than originally anticipated, mortality less than anticipated and policy persistency greater than anticipated. In other words, individuals are living longer and keeping their policies in force and filing more claims than anticipated when this policy was originally priced. As a result, premiums must be adjusted to ensure current and future claims are adequately funded.*

The policyholder notification letters were developed with input from key parties within RiverSource Life, including actuarial, legal, compliance, communications and service delivery. Over time, we have made several enhancements to these letters and the corresponding FAQ to provide additional clarity to the policyholder.

We believe that the language in the policyholder notification letters that describes the reason for a premium increase provides the appropriate amount of information. Long-term care insurance is complex, and the interaction among many factors (e.g. lower mortality, lower policy terminations and higher morbidity than originally expected) contributes to the underlying need for a rate increase. It would be misleading to state that the reason for the premium increase is simply because policyholders are living longer and filing more claims. We believe that we

provide appropriate and sufficient disclosure in our policyholder notification letters in which we state “Rates are being raised on all policies like yours to offset anticipated claims that are higher than expected.”.

In addition, we do not want to communicate to our policyholders either that they must pay higher premiums simply because they are living longer or that they should not file a claim if appropriate. In our policyholder notification letters, we state “This premium increase is designed to offset some of these anticipated costs and in no way reflects on the integrity of your policy, nor is it based on your individual claims history, age, health status, or any other personal factor.” to provide reassurance to the policyholder.

- 2. The answer to question 5 on the FAQ is somewhat confusing since it refers to both RiverSource Life Insurance Company and RiverSource Life of NY. We suggest the following changes: Remove the sentence that begins with "If the state insurance regulatory..." as well as the following sentence and replace this with "The state insurance regulatory authority reviewed the filing for compliance with applicable state laws and regulations, and because it was found to be compliant, approved our request for RiverSource Life Insurance Company."*

It is standard practice throughout the organization to make references to both RiverSource Life Insurance Company and RiverSource Life Insurance Co. of New York (“RiverSource Life of NY”) in client communications such as the FAQ. RiverSource Life is the parent company of RiverSource Life of NY.

Additionally, we believe that the current language in the FAQ question #5 (“If the state insurance regulatory authority agrees with our request, it is then approved and implemented”) is accurate and easily understood by the policyholder.

Ms. Houser, I respectfully request that you reconsider the policyholder notification letters and FAQ that the company is currently using as appropriate with no need for changes.

I, Anju Gupta-Lavey, am an Actuary for RiverSource Life Insurance Company. I am a Member of the American Academy of Actuaries, and I meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained herein.



Ms. Houser, thank you for working with us to complete this filing in Virginia. Please let me know if you would find additional information helpful or if you have any questions. You can reach me directly at (612) 671-2909 or by email at [anju.x.gupta-lavey@ampf.com](mailto:anju.x.gupta-lavey@ampf.com).

RiverSource Life Insurance Company  
RiverSource Distributors, Inc.  
9550 Ameriprise Financial Center  
Minneapolis, MN 55474



Respectfully,

A handwritten signature in black ink that reads "Anju Gupta-Lavey". The signature is written in a cursive, flowing style.

Anju Gupta-Lavey, FSA, MAAA  
Actuary  
RiverSource Life Insurance Company

May 30, 2014

Ms. Janet Houser  
Virginia Bureau of Insurance  
1300 East Main Street  
Richmond, Virginia 23219

Via *SERFF*

RE: RiverSource Life Insurance Company ("RiverSource Life")  
Company NAIC # 65005  
Company FEIN # 41-0823832  
SERFF Tracking # AERS-12909910  
Policy Form: Long Term Care Policy Form 30160A-VA  
Long Term Care Insurance Endorsement Form 32100

Dear Ms. Houser:

Thank you for reviewing our filing. This letter is in response to your letter dated March 24, 2014 regarding information needed for the above-referenced filing. The remainder of this letter provides the additional information requested in your March 24, 2014 letter. I restate your requests for additional information in italics for reference.

- 1. Thank you providing additional information regarding the policyholder notification letters. We agree LTC is a complicated product and appreciate the fact the company has had numerous resources involved in the development of this correspondence. The State Corporation Commission has an outstanding order to the BOI to obtain comments from the general public regarding long term care rates and proposed amendments. The BOI takes this very seriously, and based on both written and verbal comments received from our consumers and the national level of interest in this product, the management of the BOI has provided direction regarding such letters.*

*In light of this, we again request the letters be modified to explain why anticipated claims are higher than expected. The drivers should be identified in language that anyone without an insurance background can easily understand in consumer friendly language.*

*In regards to the FAQ, we withdraw our concern regarding the reference to both RiverSource Life Insurance Company and RiverSource Life Insurance Co. of New York. Although we may agree the response to question 5 in the FAQ may be correct, it is also misleading. The management at the BOI feels this statement should more clearly reflect our role in this process by stating we reviewed this request for compliance with applicable state laws and regulations, and because it was compliant, the filing was approved.*

Enclosed with this letter are sample copies of revised notification letters that will be sent to affected policyholders prior to implementation of the requested rate increase. We have revised the language regarding the reason for the rate increase to address the Bureau's concerns as well as balancing the company's concerns described in my letter dated March 4, 2014 for the company's pending filing SERFF Tracking # AERS-12909910.

Specifically, we have added the following sentences to further describe the reasons for the rate increase: "This is due in part to individuals living longer and keeping their policies longer, which has resulted in more claims being filed than we anticipated when this policy was originally priced."

The company believes this revised language provides proper disclosure of the reasons for the rate increase.

Regarding the role the Bureau has played in reviewing and approving this rate increase, the company believes it is most appropriate to provide a more detailed description in the policyholder notification letter, rather than the FAQ. Specifically, we have modified the policyholder notification letters to replace these paragraphs:

*"As required, we have filed our request for this premium increase with the appropriate insurance regulators. We periodically review anticipated claims and other experience for our long-term care business. Based on our current view, we may request regulatory approval for additional premium increases in the future."*

*It is important to note the premium on your policy is always subject to change so long as we change the rates for all policies like yours. The provision "We Have the Right to Change Premiums" is on the cover page of your policy."*

with the following paragraphs, to further describe the Bureau's role:

*"As required, we have filed our request for this premium increase with the Virginia Bureau of Insurance. The Bureau of Insurance has reviewed the request for this premium increase for compliance with applicable Virginia state laws, rules and regulations and has approved this premium increase."*

*Please note that the company periodically reviews anticipated claims and other experience for our long-term care business. Based on our current view, we may request regulatory approval for additional premium increases in the state of Virginia in the future."*

The company believes this language is accurate and easily understood by the policyholder.

2. *Attached is a NAIC's Executive/Plenary bulletin adopted on December 18, 2013. We have now added this to our review process and ask that the company advise if this filing is or is not consistent with the recommendations. Please provide details that support your response.*

Enclosed with this letter is an Actuarial Memorandum that has been revised to demonstrate that this rate increase request complies with the dual-loss ratio standard for individual long-term care policy forms set forth in the NAIC Model Bulletin for Alternative Filing Requirements for Long-Term Care Premium Rate Increases ("the Bulletin"), as adopted by the NAIC on December 18, 2013. Please note that, in accordance with standards set forth in 14 VAC 5-130-50(B), the loss ratios are calculated an interest rate consistent with that assumed in the determination of premiums at the time of original pricing, rather than the maximum valuation interest rate for contract reserves recommended in the Bulletin.

If the requested 10% increase is approved, the company will offer insureds a contingent benefit upon lapse in accordance with the duration and trigger percentages referenced in the Bulletin, regardless of the issue date of the policy.

If the Bureau approves the currently requested 10% rate increase, the company is willing to agree not to seek any increase effective within three years of the approval date of the currently requested increase. However, since this is a pre-rate stability filing, we do believe it is likely that we will request additional rate increases after three years.

This filing is consistent with the recommendations set forth in the Bulletin, other than the interest rate used in the loss ratio calculations as described above.

3. *As stated previously, the State Corporation Commission has an outstanding order to the BOI to obtain comments from the general public regarding long term care rates and proposed amendments. Because of feedback from our consumers, we have asked our insurers to now complete the Rate Rule Summary which the company did. We realize this is a new exercise for you; however, this one way to provide our consumers a better explanation as to why a rate increase was requested and what were the contributing causes. As a result, we ask this form be amended to more accurately reflect this information in a more consumer friendly manner.*

Enclosed with this response is the Rate Request Summary form which has been revised to provide more details as the Bureau has requested. The company believes this revised form provides proper disclosure of the reasons for the rate increase and is easily understood by the consumer.

I, Anju Gupta-Lavey, am an Actuary for RiverSource Life Insurance Company. I am a Member of the American Academy of Actuaries, and I meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained herein.



Ms. Houser, thank you for working with us to complete this filing in Virginia. Please let me know if you would find additional information helpful or if you have any questions. You can reach me directly at (612) 671-2909 or by email at [anju.x.gupta-lavey@ampf.com](mailto:anju.x.gupta-lavey@ampf.com).

Respectfully,



Anju Gupta-Lavey, FSA, MAAA  
Actuary  
RiverSource Life Insurance Company

Enclosure:      Revised Sample Policyholder Notification Letters and FAQ  
                     Revised Actuarial Memorandum  
                     Revised Rate Summary Form

Health Insurance Rate Request Summary  
Part 1 – To Be Completed By Company

Reset Form

Company Name and NAIC Number: RiverSource Life Insurance Company, #65005

SERFF Tracking Number: AERS-129009910

Effective Date: Upon approval

(Projected) Number of Insureds Affected: 1,674

New Rates  
Average Annual Premium Per Member:

Revised Rates  
Average Annual Premium Per Member: \$1,859

Average Requested Percentage Rate Change Per Member: 10%

Minimum Requested Percentage Rate Change Per Member: 10%

Maximum Requested Percentage Rate Change Per Member: 10%

Plans Affected  
(The Form Number and "Product Name")

Form#	"Product Name"(if applicable)
30106A-VA, with endorsement form 32100	

Attach a brief narrative to summarize the key information used to develop the rates including the main drivers for new or revised rates.

This document is intended to help explain the rate filing and it is only a summary of the company's request. It is not intended to describe or include all factors or information considered in the review process. For more detailed information, please refer to the complete filing.

#### Narrative: Explanation of Justification for Rate Increase

Rates are being raised on all policies issued under these policy forms to offset anticipated claims that are higher than previously expected. This is due in part to individuals living longer and keeping their policies longer, which has resulted in more claims being filed than we anticipated when this policy was originally priced. As a result, premiums need to be adjusted to ensure there is adequate funding to pay current and anticipated future claims. This premium increase is designed to offset some of these anticipated increased costs and in no way reflects on the integrity of an individual's policy, nor is it based on an individual's claims history, age, health status, or any other personal factor.

As required, we have filed our request for this premium increase with the Virginia Bureau of Insurance and included the necessary actuarial data and other items requested by the Virginia Bureau of Insurance to support the increase.

## Sample Rate Increase Notification Letter to Clients On Waiver of Premium

<DATE>

Policy Number:  
<POLICY NUMBER>

<POLICYOWNER NAME>  
<ADDRESS1>  
<ADDRESS2>

### Notice of Premium Rate Increase

Re: RiverSource Life Insurance Company Long Term Care Insurance Policy  
<POLICY NUMBER>

Dear <POLICYOWNER NAME>,

This letter is to inform you that the premium for your long-term care insurance policy will increase effective <EFFECTDATE>, which is your next policy anniversary date.

#### Your premium payments currently waived

While this increase applies to all policies like yours, your premium is currently being waived while you are receiving long-term care benefits from your policy. Your obligation to pay premium on the policy, which includes this increase, won't restart as long as you meet the policy's provisions for having your premium waived.

#### Reasons for this increase

Rates are being raised on all policies like yours to offset anticipated claims that are higher than expected. This is due in part to individuals living longer and keeping their policies longer, which has resulted in more claims being filed than we anticipated when this policy was originally priced. As a result, premiums need to be adjusted to ensure there is adequate funding to pay current and anticipated future claims. This premium increase is designed to offset some of these anticipated increased costs and in no way reflects on the integrity of your policy, nor is it based on your individual claims history, age, health status, or any other personal factor.

As required, we have filed our request for this premium increase with the Virginia Bureau of Insurance. The Bureau of Insurance has reviewed the request for this premium increase for compliance with applicable Virginia state laws, rules and regulations and has approved this premium increase.

Please note that the company periodically reviews anticipated claims and other experience for our long-term care business. Based on our current view, we may request regulatory approval for additional premium increases in the state of Virginia in the future.

It is important to note the premium on your policy is always subject to change so long as we change the rates for all policies like yours. The provision "We Have the Right to Change Premiums" is on the cover page of your policy.

#### Your new premium

When this increase takes effect, your <PREMMODE> premium payment will increase from \$<OLDPREMAMT> to \$<NEWPREMAMT>, beginning with the premium payment that is due <EFFECTDATE>. As described above, the new premium will only be due if you no longer meet the policy's provisions for having your premium waived.

#### You have options

**Sample Rate Increase Notification Letter to Clients On Waiver of Premium**

Please be assured that we remain committed to helping meet your long-term protection needs. When you begin paying premiums again, feel free to contact us to discuss potential options that may offset this premium increase.

SAMPLE

## Sample Rate Increase Notification Letter to Clients On Waiver of Premium

**For more information or assistance, please contact:**

- > your financial advisor, <Advisor Name> <designations>, at <phone number>
- > an Ameriprise Financial client service representative at 1 (866) 863-9497, Monday through Friday, 7 a.m. to 6 p.m. Central time

We value you as a client and look forward to continuing to serve you.

Sincerely,

RiverSource Life Insurance Company

<ADVISOR NUMBER AND NAME>

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132107 E(8/13)

## Sample Rate Increase Notification Letter to Clients Not on Waiver of Premium

<DATE>

Policy Number:  
<POLICY NUMBER>

<POLICYOWNER NAME>  
<ADDRESS1>  
<ADDRESS2>

### Notice of Premium Rate Increase

Re: RiverSource Life Insurance Company Long Term Care Insurance Policy  
<POLICY NUMBER>

Dear <POLICYOWNER NAME>,

This letter is to inform you that the premium for your long-term care insurance policy will increase effective <EFFECTDATE>, which is your next policy anniversary date.

#### Reasons for this increase

Rates are being raised on all policies like yours to offset anticipated claims that are higher than expected. This is due in part to individuals living longer and keeping their policies longer, which has resulted in more claims being filed than we anticipated when this policy was originally priced. As a result, premiums need to be adjusted to ensure there is adequate funding to pay current and anticipated future claims. This premium increase is designed to offset some of these anticipated increased costs and in no way reflects on the integrity of your policy, nor is it based on your individual claims history, age, health status, or any other personal factor.

As required, we have filed our request for this premium increase with the Virginia Bureau of Insurance. The Bureau of Insurance has reviewed the request for this premium increase for compliance with applicable Virginia state laws, rules and regulations and has approved this premium increase.

Please note that the company periodically reviews anticipated claims and other experience for our long-term care business. Based on our current view, we may request regulatory approval for additional premium increases in the state of Virginia in the future.

It is important to note the premium on your policy is always subject to change so long as we change the rates for all policies like yours. The provision "We Have the Right to Change Premiums" is on the cover page of your policy.

#### Your new premium

When this increase takes effect, your <PREMMODE> premium payment will increase from \$<OLDPREMAMT> to \$<NEWPREMAMT>, beginning with the premium payment that is due <EFFECTDATE>. Note that the new premium payment will be processed on your regularly scheduled payment date, which may be on, before or after the <EFFECTDATE> due date.

#### You have options

We remain committed to helping meet your long-term protection needs. Although the premium for your policy is increasing, there are options available to you that may help offset the increase. Because your long-term care policy represents an important piece of a sound financial plan, we urge you to consider these options carefully.

## Sample Rate Increase Notification Letter to Clients Not on Waiver of Premium

**Keep your benefits as they are:** You can continue your policy in force at the current level of benefits by paying the increased premium.

**Modify your benefits:** You can also modify your benefits to decrease your premium. Please keep in mind that if you reduce your benefits, you cannot increase them in the future.

- **Daily Benefit Amount Reduction:** By reducing your current daily benefit amount from \$<NHDBAMT> to \$<ALTDDBAMT>, your <PREMMODE> premium would be \$<ALTPREM>. This is approximately the same rate as your current payment. Keep in mind that your policy may contain other benefit amounts that will decrease proportionally if you reduce your daily benefit amount.
- **Benefit Adjustments:** Adjusting other policy features may also help reduce your premium costs. One example is to lengthen your elimination period, which is the waiting period before benefits begin. Another example is to shorten your overall maximum benefit period.

*(Comment: this statement appears only if the client has Home Care coverage through Rider)*

You may also consider reducing your Home Care coverage benefits.

*(Comment: this statement appears only if the client has a Non-forfeiture option through Rider)*

Because you purchased the Nonforfeiture Benefit Rider, you may also choose to stop paying premium and have a reduced lifetime benefit. Please refer to your policy for details about how this rider works.

*(Comment: this statement appears only if the client is eligible for Contingent Benefit Upon Lapse)*

**Lapsing your policy:** As a result of this premium increase, you are eligible for a contingent nonforfeiture benefit upon lapse. This means that if you stop paying the premium due for your policy within 120 days after the effective date of this premium increase, and as a result your policy lapses for non-payment of premium, your policy will be considered fully paid-up with a reduced lifetime benefit with no further premiums due. In this event, your policy's current daily benefit amount will be locked in at the current level, but the maximum lifetime benefit payable will be reduced to an amount equal to the greater of (1) 100% of the sum of all premiums you have paid for your policy, and (2) 30 times your policy's current nursing home daily benefit amount. Once benefits paid on your policy reach this reduced maximum benefit limit, no additional benefits are payable.

If you pay premiums covering the period more than 120 days after the effective date of this premium increase, you will not be eligible for this benefit unless the premium for your policy increases again.

Please consult with your advisor before you stop paying premiums and reduce your benefit period.

### Carefully consider your options

It is important that you determine which option best suits your individual circumstances and anticipated future needs. Please carefully consider the need and expenses associated with long-

## Sample Rate Increase Notification Letter to Clients Not on Waiver of Premium

term care before you adjust your benefits or decide to forgo this coverage completely. Several documents are enclosed that will assist you in understanding the rate increase and your available options. Read these carefully. Please keep in mind that if you reduce your benefits, you will be unable to increase them in the future.

### Your next step

#### If you decide to keep your present coverage

Should you wish to continue your policy at its current level of benefits at the increased premium, no action other than paying the indicated premium before its due date is required by you at this time.

#### If you decide to modify your coverage

Please complete the enclosed Long-Term Care Coverage Change Request Form and return it to us. We must receive this form from you no later than <EFFDATE1> to ensure your requested changes are processed before <EFFECTDATE>, when the premium increase for your policy takes effect.

If your Long-Term Care Coverage Change Request Form is not received before <EFFDATE1>, your requested changes may not be processed before the date on which the increased premium is due. You are responsible for paying the full increased premium until your requested benefit change is processed. If a benefit change is processed after the increased premium due date and you paid the increased premium, you will receive a refund for any overpaid premium.

#### For more information or assistance, please contact:

- > your financial advisor, <Advisor Name>, at <phone number>
- > an Ameriprise Financial client service representative at 1 (866) 863-9497, Monday through Friday, 7 a.m. to 6 p.m. Central time

We value you as a client and look forward to continuing to serve you.

Sincerely,

RiverSource Life Insurance Company

<ADVISOR NUMBER AND NAME>

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132106 E(8/13)

**Long-Term Care Coverage Change Request Form**

[ October 11, 2012 ]

[ 9100-2400000-7 004 ]

[ V John Doe  
ADDRESS Line 1>  
City, VA 99999-9999 ]

Dear [ V John Doe: ]

You have options to modify your existing coverage to offset the upcoming premium increase on your policy. If you want to elect one of these options, please indicate your choice in the space provided below and return this form in the enclosed postage-paid envelope to:

[ RiverSource Life Insurance Company  
70100 Ameriprise Financial Center  
P.O. Box 10  
Minneapolis, MN 55440-8902 ]

**If you decide to modify your coverage at this time**

Please complete this Long-Term Care Coverage Change Request Form and return it to us. We must receive this form from you no later than [ July 15, 2012 ] to ensure your requested changes are processed before [ August 15, 2012 ], when the premium increase for your policy takes effect.

If your Long-Term Care Coverage Change Request Form is not received before [ July 15, 2012 ], your requested changes may not be processed before the date on which the increased premium is due. You are responsible for paying the full increased premium until your requested benefit change is processed. If a benefit change is processed after the increased premium due date and you paid the premium, you will receive a refund for any overpaid premium.

Because your long-term care policy represents an important piece of a sound financial plan, we urge you to consider these options carefully. Please keep in mind that if you reduce your benefits, you cannot increase them in the future.

**Your options**

Please indicate your choice by checking one of the options below:

Reduce my current daily benefit amount from [ \$125.00 ] to [ \$109.00 ] which will result in a [ annual ] premium of [ \$2,862.58 ] beginning with the premium payment that is due [ August 15, 2012 ]. I understand that my policy may contain other benefit amounts that will decrease proportionally if I reduce my daily benefit amount.

[ Your Home Care coverage and premium will remain unchanged. ]

[ The Benefit Increase Option on your policy remains intact and will result in an increase of [ \$6.25 ] in your daily benefit amount in one year. ]

291524-VA

The Benefit Increase Option on your policy of 5% per year will remain intact and will continue to increase your daily benefit amount annually.

Because I purchased the Nonforfeiture Benefit Rider, I want to stop paying premiums and have a reduced lifetime benefit, as described in my policy.

Because I am eligible for a contingent nonforfeiture benefit upon lapse, I want to stop paying premiums and have a reduced lifetime benefit equal to the greater of (1) 100% of the sum of all premiums paid over the life of the policy, and (2) 30 times my policy's current nursing home daily benefit amount.

Please make the following change(s) to my policy:

---

---

You will receive a new policy schedule after these changes are processed.

\_\_\_\_\_  
Signature of Policyholder

\_\_\_\_\_  
Date

**For more information or assistance, please contact:**

- > your financial advisor, <Advisor Name>, at (999) 000-9999
- > an Ameriprise Financial client service representative at 1 (866) 863-9497,

We value you as a client and look forward to continuing to serve you.

Sincerely,

RiverSource Life Insurance Company

12345 Advisor Name

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291524-VA

**Frequently Asked Questions for RiverSource Life Insurance Company (RiverSource Life)  
and RiverSource Life Insurance Co. of New York (RiverSource Life of NY)  
In-Force Long-Term Care Policyowners Affected by the Recent Rate Increase**

**Q1: Is this a bill?**

A: No, this notice is not a bill. This notice does provide important information regarding your upcoming Long Term Care premiums.

**Q2: Why are my premiums going up?**

A: Premiums are going up on the block of policies similar to yours due to anticipated claims that are higher than expected. It is important that premiums collected by an insurance company bear a relationship to the claims it anticipates paying.

**Q3: Are my rates going up because I filed a claim?**

A: No. In analyzing the need for a rate increase, claims information is reviewed in aggregate. In other words, we look at the claims experience across all policies like yours. This rate increase in no way reflects on any individual claims you may have submitted.

**Q4: But my policy says it is “guaranteed renewable.” How can my rates be going up?**

A: A policy that is guaranteed renewable means that it cannot be canceled because of a change in your health. It also means that rates can only be changed on your policy if they are changed for all other policies like yours. As long as you pay the premium, it cannot be canceled.

**Q5: How do I know that this increase is justified?**

A: Insurance is a heavily regulated industry. In order to implement this rate increase, RiverSource Life is required to file a request for approval with each state insurance regulatory authority. RiverSource Life of NY is required to file a request for approval with the State of New York. Included with our request is the necessary actuarial data to support the increase. If the state insurance regulatory authority agrees with our request, it is then approved and implemented. RiverSource Life and RiverSource Life of NY have filed their requests for an increase. (Note: There are a handful of states that are not empowered to actually approve a rate increase. However, RiverSource Life and RiverSource Life of NY still provided these states with the same information concerning our need to increase rates for informational purposes.)

**Q6: Will my rates go up again in the future?**

A: Future rate increases are possible on all guaranteed renewable long-term care insurance policies no matter which company issued the policy. However, as indicated above, any future rate increase will require state regulatory approval before it can be implemented. It is possible that you will see additional rate increases in the future.

**Q7: You indicate that there are options available to me to offset this premium increase. What do you mean by that?**

A: At the time you purchased your policy you were presented with several options regarding the exact nature of your benefits under the policy. Your selection of options determined the initial premium that was charged for your policy. In light of this rate increase, you may wish to revisit those options and make an adjustment to your current benefit selections. Doing so could help you lower your premium to a point that it would be comparable to the premium you were paying before the rate increase.

**Q8: What options are available to me to offset this premium increase?**

A: Each block of long-term care insurance policies which RiverSource Life or RiverSource Life of NY sold had different benefit options. Depending on the option(s) you may have chosen when you purchased your policy, you may want to consider a different option. Listed below are options that may be available to you. You will want to refer to your policy for the specific options that are available to you.

1. Current Daily Benefit Amount: This dollar amount represents the maximum daily benefit we will pay according to your policy. Reducing this amount will reduce the amount that we will pay for covered services received and the premium charged for your policy. Keep in mind that your policy may contain other benefit amounts that will be proportionally decreased if you reduce your daily benefit amount.

2. **Elimination Period:** This is the number of days that covered services are provided to you but which must be paid for by you before the policy begins to pay benefits. For example, if your policy has a 20-day elimination period, you must be receiving covered services for 20 days before we start paying benefits for services received on or after the 21<sup>st</sup> day. Increasing the elimination period will reduce your premium.
3. **Benefit Period:** This is the total period of time for which benefits will be paid during the life of the policy. This period is specified on your policy schedule. Reducing the benefit period will reduce your premium. For example, you may want to consider reducing your benefit period from lifetime to four years.
4. **Home Care Coverage:** If you have home care coverage, you may be able to reduce these benefits.

**Q9: Should I let my policy lapse?**

A: Your policy represents a critical component of a sound financial plan. You should always consider one of the options available to reduce your premium before you let this coverage lapse. Please consult with your advisor before making changes to your policy.

**Q10: Will I get a refund if I cancel my policy or let my policy lapse?**

A: No. Much like other types of insurance (i.e. automobile, homeowners, etc.), your policy does not accumulate any cash value so canceling your policy or letting it lapse will not result in any refund to you. If you cancel your policy, the only refund you will receive is a return of any unearned premium that you may have already paid for the period of time between the time you cancel your policy and your next premium due date. You will not be able to receive any refund of premium that has already been earned by the company.

**Q11: Wouldn't it be cheaper for me to get a new policy?**

A: It may or it may not. It's important to keep in mind that obtaining a new policy with any carrier will require your application to be underwritten at your current age and at your current health status. Also, as many carriers have also experienced rate increases on existing blocks of long-term care policies, they are increasing the premiums they charge for new policies as well. If you choose to explore the possibility of obtaining a new policy elsewhere, we believe you will find that your existing policy, even with this premium increase, represents a good value compared with obtaining new coverage at current market rates. *If you are considering a new policy, be sure you have an offer of insurance for the new policy before you drop your existing coverage. If you don't pay the increased premium on your existing policy, your policy will lapse.*

**Q12: Do I have to do anything if I want to keep my benefits the way they are?**

A: No. As long as you continue to pay your premiums, now at the increased rate, when they are due, your policy will remain as it was prior to the rate increase. You only need to take action if you would like to explore the options available to you for reducing your benefits to offset the rate increase.

**Q13: My premium is paid by a credit card or a bank authorization. I'd like to keep my current coverage; what will happen to my premium?**

A: If your premium is currently being paid by a credit card or a bank authorization, the deduction amount will automatically be increased to the new premium amount. You don't need to take any action.

**Q14: My premium is paid by a systematic payout from another Ameriprise Financial account. I'd like to keep my current coverage; what will happen to my premium??**

A: If your premium is currently being paid by a systematic payout from another Ameriprise Financial account, you may need to take action:

- **If taxes are not being withheld**, the payout amount will automatically be increased to the new premium amount. You don't need to take any action.
- **If taxes are being withheld**, the gross payout amount may need to be adjusted. Contact your financial advisor or call us at our service center for more information.

Not all policies are available in all states.

Insurance and annuity products are issued by RiverSource Life Insurance Company and in New York, by RiverSource Life Insurance Co. of New York, Albany, New York. These companies are affiliated with Ameriprise Financial Services, Inc. Only RiverSource Life Insurance Co. of New York is authorized to sell insurance and annuity products in New York.

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290912 E(7/12)

**State:** Virginia**Filing Company:**

RiverSource Life Insurance Company

**TOI/Sub-TOI:** LTC03I Individual Long Term Care/LTC03I.001 Qualified**Product Name:** Long Term Care**Project Name/Number:** 30160A.32100 2013/30160A.32100 2013

## Superseded Schedule Items

Please note that all items on the following pages are items, which have been replaced by a newer version. The newest version is located with the appropriate schedule on previous pages. These items are in date order with most recent first.

Creation Date	Schedule Item Status	Schedule	Schedule Item Name	Replacement Creation Date	Attached Document(s)
02/19/2014	Withdrawn 12/03/2014	Supporting Document	L&H Actuarial Memorandum	05/30/2014	VA Revised_ActMem_30160A_32100_20140219.pdf (Superseded)
05/01/2013	Withdrawn 12/03/2014	Rate	VA ExhibitXIII Premiums 30160A 32100	05/30/2014	VA ExhXIII_Premiums_30160A_32100_20130801.pdf (Superseded)
05/01/2013	Withdrawn 02/25/2014	Supporting Document	L&H Actuarial Memorandum	02/19/2014	VA ActMem_30160A_32100_20130801.pdf (Superseded)

**RIVERSOURCE LIFE INSURANCE COMPANY**

**Address: 227 Ameriprise Financial Center, Minneapolis MN 55474**

**Actuarial Memorandum for 30160A, Subject to Endorsement Form 32100**

**February 2014**

Policy form 30160A-VA, subject to endorsement form 32100, is an individual policy form providing benefits to individuals for confinement in a nursing home with home care services. This form was issued in Virginia from July 15, 2000 to June 15, 2003.

**1. Purpose of Filing**

This actuarial memorandum has been prepared for the purpose of demonstrating that the anticipated loss ratio standard of this product meets the minimum requirements of your state and may not be suitable for other purposes.

**2. Description of Benefits**

This is a federally tax qualified, individually underwritten policy form that provides comprehensive long term care coverage. Benefits are payable for nursing home and assisted living facility (ALF) care, home and community care, adult day care, respite care, caregiver training, and case management services. Equipment purchase benefits are also included with a lifetime maximum of 50 times the home and community care daily maximum benefit amount. Benefits may be payable for other supplies and services if they are specified in an alternate plan of care agreed to by the insured, the insured's physician and RiverSource Life Insurance Company ("RiverSource Life").

This policy reimburses expenses incurred by the insured subject to the amount of coverage purchased. The facility care daily maximum benefit (FCDMB) is elected by the proposed insured at the time of application. This facility care daily maximum benefit amount is applied to nursing home, ALF, bed reservation, respite care, and alternative plan of care benefits. The home and community care daily maximum benefit amount is also elected by the proposed insured at the time of application and is a percentage (50%, 75%, or 100%) of the facility care daily maximum benefit amount. The home and community care daily maximum benefit amount is applied to home care and adult day care.

A lifetime maximum benefit amount is also elected at the time of application. This establishes the maximum amount that will be paid under the policy for the combined total of all benefit payments. The choices are 730 x FCDMB, 1,460 x FCDMB, 2,190 x FCDMB, and unlimited.

***INFLATION PROTECTION***

At the time of application the proposed insured can elect no benefit increase, the simple benefit increase option, or the compound benefit increase option. The simple benefit increase option will increase the daily maximum amounts (both facility and home and community care amounts) by 5% of the original daily maximum amount each year starting with the second policy year and continuing for the life of the policy, while the compound benefit increase option will increase the previous year's daily maximum amounts (both the facility and home and community care amounts) by 5% each year starting with the second policy year and continuing for the life of the policy. The increasing benefits apply even when the policy is in claim status. Also, the remaining lifetime maximum benefit amount, before the increase, will increase each policy year by the same percentage that the facility care daily maximum benefit amount increases.

## RIVERSOURCE LIFE INSURANCE COMPANY

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Actuarial Memorandum for 30160A, Subject to Endorsement Form 32100

February 2014

When the total amount paid under a policy is equal to the current lifetime maximum benefit amount, the policy is terminated.

### *DEDUCTIBLE PERIOD*

Benefit payments commence after a deductible period of 20 or 90 days of service, depending on the plan initially chosen. Satisfaction of the deductible period begins with the first day on which benefit eligibility is established and expenses are incurred for which payment would be made if there were no deductible period. Only days in which services are used are credited toward satisfaction of the deductible period. These days do not need to be consecutive, but they must occur within a continuous period of three times the number of days in the deductible period. Only one deductible period needs to be satisfied during the lifetime of the policy.

The deductible period applies to all policy benefits except caregiver training, case management, equipment purchase, and respite care. Days for which the only expenses incurred are expenses that are not subject to the deductible period will not be used to satisfy the deductible period.

### *BENEFIT ELIGIBILITY AND CONDITIONS*

A licensed health care practitioner must certify the following eligibility conditions at least annually. Benefit eligibility is based on the following: (a) the insured being unable to perform at least 2 or more of the following 6 activities of daily living (ADLs): (1) eating, (2) toileting, (3) transferring, (4) dressing, (5) continence, and (6) bathing, without substantial assistance for a period of at least 90 days due to a loss of functional capacity, or (b) severe cognitive impairment requiring substantial supervision, or (c) the insured having a level of disability similar to that described in (a) above, based on standards established by the Secretary of the Treasury.

A Medicare non-duplication provision excludes benefits that otherwise would be paid but for the application of a Medicare deductible or coinsurance amount.

### *FACILITY CARE BENEFITS*

Facility care benefits are payable for nursing home confinement, whether skilled, intermediate, or custodial levels of care are received. Hospital confinement is not a prerequisite for benefit entitlement. Once benefit eligibility is established and the deductible period is satisfied, expenses incurred as a resident inpatient in a nursing home will be reimbursed up to the facility care daily maximum benefit amount that applies on the day expenses are incurred.

Facility care benefits are also payable for stays in a qualified ALF. A qualified ALF is one that has a minimum of 8 inpatients and has a 24-hour awake, trained, and ready to respond staff. Once benefit eligibility is established and the deductible period is satisfied, expenses incurred as a resident inpatient in an ALF will be reimbursed up to the facility care daily maximum benefit amount that applies on the day expenses are incurred.

Premium payments will be waived during extended nursing home and ALF stays. This waiver begins after 90 days of confinement (including during the deductible period) in a nursing home or ALF. These days do not need to be consecutive, but they must occur

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**Actuarial Memorandum for 30160A, Subject to Endorsement Form 32100**

**February 2014**

within a continuous period of 180 days. The waiver stops once nursing home and ALF benefits cease.

If a temporary hospitalization is required during a period of confinement in a nursing home or ALF and there is a charge to reserve a bed in the facility, this policy will pay the facility care daily maximum benefit amount for up to 21 days per policy year. These days also count towards satisfying the deductible period.

*HOME CARE BENEFITS*

Home care benefits covered at 100% of the home and community care daily maximum benefit amount are services provided by a nurse, a licensed physical, occupational or speech therapist, a home health aide, a personal care attendant, and adult day care. Home care benefits covered at 80% of the home and community care daily maximum benefit amount are homemaker and chore services. These expenses will be reimbursed subject to the percent of the home and community care daily maximum benefit amount listed above on the day expenses are incurred.

Premium payments will be reimbursed on a month-to-month basis during extended periods of home and community care. This premium waiver begins after expenses for home and community care services, excluding homemaker and chore services, have been incurred for 90 days. The expenses may be incurred while the deductible period is being satisfied or policy benefits are being received. These days do not need to be consecutive, but they must occur within a continuous period of 270 days. The premiums will continue to be reimbursed for each month in which at least 12 days of home and community care services, excluding homemaker and chore services, are received.

*ADDITIONAL BENEFITS*

Benefits in this section do not count against either the facility or home and community care daily maximum benefit amounts. They are, however, deducted from the lifetime maximum benefit amount, except for certain case management services described below. These expenses are not subject to the deductible period and they may not be used to satisfy the deductible period.

Expenses incurred for the first 14 days of respite care received during a policy year will be reimbursed subject to the facility care daily maximum benefit amount that applies on the day expenses are incurred.

Pre-approved equipment purchase expenses will be reimbursed up to a lifetime maximum of 50 times the home and community care daily maximum benefit amount. This equipment must be expected to help the insured remain in their home for at least 90 days.

Caregiver training expenses will be reimbursed up to a lifetime maximum of 5 times the home and community care daily maximum benefit amount.

The initial assessment fee for case management services is reimbursable, but to the extent it exceeds 5 times the facility care daily maximum benefit amount, it will be deducted from the lifetime maximum benefit amount. Other fees charged for case

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**Actuarial Memorandum for 30160A, Subject to Endorsement Form 32100**

**February 2014**

management services are reimbursable, but to the extent they exceed 2 times the facility care daily maximum benefit amount per use, they are deducted from the lifetime maximum benefit amount.

***NONFORFEITURE BENEFIT RIDER***

At issue, the insured has the option to select a nonforfeiture benefit rider. The nonforfeiture benefit rider provides a reduced lifetime maximum benefit amount upon lapse. The facility and home and community care daily maximum benefit amounts will continue at the same level as of the date of lapse, regardless of whether a benefit increase option was selected by the insured at issue.

The nonforfeiture benefit will begin if the policy terminates due to nonpayment of premium after the policy and rider have been in force for at least 3 years. The reduced lifetime maximum benefit amount is determined as the sum of all premiums paid at the time of lapse, including the premiums for the nonforfeiture benefit rider. The reduced lifetime maximum benefit amount will not be less than 30 times the facility care daily maximum benefit amount at the time of lapse. However, in no case will the sum of the benefits paid during the premium paying period and the reduced lifetime maximum benefit amount exceed the lifetime maximum benefit amount at time of lapse.

The provisions for the benefit are at least as favorable as those prescribed by the 1996 NAIC Model Regulation.

**3. Renewability**

This policy form is guaranteed renewable for life.

**4. Applicability**

This filing is applicable to inforce policies issued with endorsement form 32100 only, as this policy form is no longer being sold in the market.

**5. Actuarial Assumptions**

Exhibit I provides a comparison of the original pricing assumptions and the current assumptions used in this filing for mortality, lapses, morbidity and interest.

Exhibits II, III, IV and V provide experience analysis summaries for morbidity, mortality and lapse in support of the current rate increase assumptions.

The following discussion describes the actuarial assumptions used in the current rate increase analysis and summarizes our experience analysis in support of these current rate increase assumptions as well as the company's management of this block of business. We believe the current assumptions are justified by the underlying experience and that the changed assumptions from original pricing (and the prior rate increase filings) are reasonable. The current assumptions do not include any provision for profit or contingencies.

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**Actuarial Memorandum for 30160A, Subject to Endorsement Form 32100**

**February 2014**

Morbidity

Expected claim costs are the product of original pricing expected claim costs and an actual-to-expected adjustment factor.

Starting in 1989, RiverSource Life marketed nursing home policies with a zero day prior hospitalization requirement. Using the emerging experience on this business, statistics from the "1985 National Nursing Home Survey" published by the National Center for Health Statistics, and input provided from RiverSource Life's reinsurer, the expected frequencies and severities of claims were developed for nursing home benefits. Incidence rates by issue age and duration were developed to reflect the effects of underwriting on nursing home claims incidence. It was understood that the underwriting process would include an assessment of functional and cognitive abilities if considered appropriate.

Starting in 1990, RiverSource Life also marketed home health care benefit riders. At the time of original pricing, only limited insured experience was available for home and community care benefits. Therefore the expected claim costs for these benefits were derived from general population data with the assistance of RiverSource Life's reinsurer. Both the incidence rates and the length of home care usage for the first two years were determined through analysis of the "1982-1984 National Long Term Care Surveys", which polled elderly people who manifested impairments in ADLs. The home care incidence rates were modified by loading for cognitive impairment as a benefit trigger.

The data from the "1985 National Nursing Home Survey" was used to extrapolate the length of home care usage after the first two years. Additionally, experience data from continuing care retirement communities was used to verify the claim cost assumptions and to provide guidance in translating general population experience to anticipated insured population experience. Incidence rates by issue age and duration were developed to reflect the effects of underwriting on home care claims incidence.

Claim costs for the Benefit Increase Options were based on these claim costs with the benefit loaded to reflect the scheduled increases in benefits. The nonforfeiture benefit claim costs were determined by assumptions consistent with those used in establishing premium rates. The above described experience was also used to determine marital discounts.

It should be recognized that considerable judgment was made with respect to expected claim costs, especially for non-institutional benefits. After using all available data, total expected claim costs were developed that represented reasonable estimates of aggregate long term care experience under the applicable underwriting criteria.

Actual-to-expected adjustment factors have been developed from actual emerging experience through anniversaries ending December 2011 and are shown in the following tables:

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**Lifetime Benefit Actual-to-Expected Adjustment Factors**

Duration	Age at Issue						
	<53	53-57	58-62	63-67	68-72	73-77	78+
1	0.10	0.35	0.35	0.40	0.45	1.20	1.70
2	0.10	0.35	0.35	0.45	0.50	1.25	1.70
3	0.10	0.35	0.35	0.45	0.60	1.25	1.70
4	0.10	0.35	0.35	0.95	0.80	1.30	1.70
5	0.10	0.35	0.35	0.95	0.90	1.30	1.70
6	0.10	0.35	0.35	0.95	1.00	1.35	1.70
7	0.15	0.35	0.40	0.95	1.15	1.40	1.70
8	0.15	0.35	0.50	0.90	1.15	1.35	1.70
9	0.15	0.35	0.60	0.95	1.15	1.45	1.70
10	0.15	0.35	0.60	0.95	1.15	1.50	1.70
11	0.15	0.35	0.65	0.95	1.15	1.50	1.70
12	0.25	0.40	0.65	0.95	1.15	1.50	1.70
13	0.30	0.45	0.70	1.00	1.15	1.50	1.70
14	0.30	0.50	0.75	1.00	1.15	1.50	1.70
15	0.30	0.50	0.75	1.00	1.15	1.50	1.70
16	0.30	0.55	0.75	1.00	1.15	1.50	1.70
17	0.35	0.60	0.80	1.05	1.15	1.50	1.70
18	0.35	0.65	0.80	1.05	1.15	1.50	1.70
19	0.35	0.70	0.80	1.05	1.15	1.60	1.70
20	0.45	0.75	0.85	1.05	1.15	1.60	1.70
21	0.50	0.80	0.85	1.05	1.15	1.60	1.80
22	0.55	0.85	0.85	1.05	1.15	1.70	1.80
23	0.60	0.85	0.90	1.05	1.15	1.70	1.80
24	0.65	0.85	0.90	1.05	1.15	1.70	1.90
25	0.70	0.85	0.90	1.05	1.15	2.00	1.90
26	0.75	0.85	0.95	1.05	1.15	2.00	1.90
27	0.80	0.85	0.95	1.05	1.15	2.10	2.00
28	0.80	0.85	1.00	1.05	1.15	2.10	2.00
29	0.90	0.90	1.00	1.05	1.15	2.10	2.00
30	0.90	0.95	1.05	1.05	1.15	2.10	2.00
31	0.90	0.98	1.08	1.05	1.15	2.10	2.03
32	0.94	0.98	1.08	1.05	1.15	2.10	2.03
33	0.94	0.98	1.08	1.05	1.15	2.10	2.03
34	1.00	0.98	1.08	1.05	1.15	2.10	2.03
35+	1.00	1.00	1.10	1.05	1.15	2.10	2.05

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**Non-Lifetime Benefit Actual-to-Expected Adjustment Factors**

Duration	Age at Issue								
	<48	48-52	53-57	58-62	63-67	68-72	73-77	78-82	83+
1	0.10	0.10	0.10	0.20	0.20	0.45	0.65	0.70	1.50
2	0.10	0.10	0.10	0.25	0.30	0.45	0.85	0.90	1.60
3	0.15	0.15	0.15	0.30	0.35	0.55	1.05	0.90	1.70
4	0.20	0.20	0.20	0.40	0.35	0.80	1.15	1.10	2.15
5	0.25	0.25	0.25	0.45	0.45	0.80	1.40	1.40	2.15
6	0.30	0.30	0.35	0.50	0.60	1.00	1.40	1.85	2.15
7	0.30	0.30	0.40	0.55	0.75	1.05	1.45	2.05	2.15
8	0.30	0.30	0.45	0.60	0.85	1.15	1.55	2.30	2.15
9	0.35	0.35	0.55	0.75	0.95	1.20	1.70	2.60	2.20
10	0.40	0.40	0.55	0.80	1.00	1.25	1.70	2.60	2.20
11	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
12	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
13	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
14	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
15	0.45	0.45	0.55	0.95	1.05	1.25	1.75	2.65	2.20
16	0.45	0.45	0.55	0.95	1.05	1.25	1.75	2.65	2.20
17	0.50	0.50	0.60	0.95	1.05	1.25	1.75	2.65	2.20
18	0.50	0.50	0.65	0.95	1.05	1.25	1.75	2.65	2.20
19	0.55	0.55	0.70	0.95	1.05	1.25	1.80	2.65	2.20
20	0.55	0.55	0.80	0.95	1.05	1.25	1.80	2.65	2.20
21	0.60	0.60	0.80	0.95	1.05	1.25	1.80	2.70	2.20
22	0.60	0.60	0.85	0.95	1.05	1.25	1.80	2.70	2.20
23	0.65	0.65	0.85	1.00	1.05	1.25	1.80	2.70	2.20
24	0.65	0.65	0.90	1.00	1.05	1.25	1.90	2.70	2.20
25	0.70	0.70	0.90	1.00	1.05	1.25	1.90	2.70	2.20
26	0.75	0.75	0.95	1.00	1.05	1.25	1.90	2.70	2.20
27	0.80	0.80	0.95	1.00	1.05	1.25	1.90	2.70	2.20
28	0.85	0.85	1.00	1.00	1.05	1.25	1.90	2.70	2.20
29	0.90	0.90	1.00	1.05	1.05	1.25	2.00	2.70	2.20
30	0.90	0.90	1.00	1.05	1.05	1.25	2.00	2.70	2.20
31	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
32	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
33	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
34	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
35+	1.00	1.00	1.00	1.05	1.10	1.25	2.00	2.70	2.20

Beginning in 2003, we have taken steps to improve claim experience by reviewing and tightening claim adjudication and care coordination practices where possible. To reflect these improvements, we have reduced our expected claim costs by 5% for 2004 and later.

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We conduct a morbidity study every year to analyze the current actual-to-expected adjustment factors (A/E factors). Our analysis is done on a claim cost basis, rather than on a frequency and severity basis, which is not readily available.

The morbidity study is performed by comparing actual incurred claims to expected incurred claims, where expected claims reflect the original pricing claim costs adjusted with the company's most recent set of A/E factors. If the resulting cumulative actual-to-expected ratio is near 100% while minimizing the squared error, no changes are made to the A/E factors. However, if the actual-to-expected ratio has shifted away from 100% or the squared error is too high, we develop a new set of A/E factors and retest them until a good fit is found (measured by actual-to-expected ratio and squared error).

Exhibit II displays "expected" experience using our current adjustment factors compared to actual incurred claims. The expected basis shown in this exhibit reflects the currently assumed claim costs. As shown in Exhibit II the total actual-to-expected ratio using the A/E factors described above is 101.1%. This experience is based on 1,206 actual claims (378 lifetime and 838 non-lifetime). Actual claim counts split by issue age band are also displayed in Exhibit II.

Professional judgment was applied to create factors for periods beyond that for which there is experience. It has been credibly observed on older forms, including 30160A subject to endorsement form 32100, that experience has been favorable at younger attained ages but much worse than priced for at older attained ages. Thus we believe A/E factors that increase by duration are appropriate.

### Mortality

Durational mortality selection factors were developed from actual experience on all LTC forms combined and are applied to the 1983 Individual Annuitant Mortality (IAM) Basic table.

Exhibit III is based on deaths on all LTC policies incurred from policy anniversaries in 2000 through policy anniversaries in 2011. The expected basis shown in this exhibit reflects 1983 IAM Basic mortality with the currently assumed selection factors. The selection factors fit the observed data very well with the resulting A/E at or near 100%.

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The data, along with the following rules, were used in the development of the current selection factors:

- a. Factors must be non-decreasing by duration;
- b. Round to nearest 5%; and
- c. Maximum of 100%.

Selection factors are assumed to differ by issue age band, since the selection period is expected to be shorter at older issue ages.

At the older issue ages, mortality increases to approximately 100% of the table. In general, that has not been the case through duration 22 for younger issue ages, but we expect that it would as insureds reach a very advanced age. For this reason the effect of selection is extended up to duration 34 for younger issue ages. This experience includes 32,715 deaths.

#### Lapse Rates

Ultimate voluntary termination rates range from 1.1% to 5.4% based on issue age band and benefit category (lifetime and non-lifetime). No additional lapse due to the proposed rate increase is projected. Exhibit IV provides the additional lapses and risk amount reductions experienced by the company at different levels of rate increase.

Exhibit V provides the lapse experience across all LTC forms combined from policy anniversaries in 2000 through policy anniversaries in 2011. The expected basis shown in this exhibit reflects the currently assumed lapse rates.

Lapse experience varies by issue age and benefit type (lifetime benefit versus non-lifetime benefit). We applied judgment to the data contained in this exhibit to derive the best estimate lapse assumption. For later durations, we often looked at several durations' experience together to improve credibility. We also made an effort to reflect that lapse rates seem to increase some at older attained ages. This experience includes 33,760 lapses, including 9,225 in durations 8 and later. The exposure and actual lapses close to the implementation of rate increases are excluded from this analysis. For non-lifetime benefits, lapses include policies that have maximized their benefits.

We have experienced much stronger customer loyalty than anticipated at the time these policy forms were initially priced. The resulting high policy persistency has unfortunately had an adverse impact on loss ratios.

#### Adverse Selection

No adverse selection is projected.

#### Expenses

Expenses have not been explicitly projected. It is assumed that the originally filed expense assumptions remain appropriate, except that commission rates were reduced in 2008 and 2011 so that total commissions paid before and after the prior increases in premium are similar. In addition, as part of this rate increase process, the company

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anticipates adjusting commission rates so that the total commissions paid before and after this increase in premium are similar.

The above assumptions are based on actual inforce experience of RiverSource Life and are deemed reasonable for this particular policy form; they do not include any provision for profit or contingencies.

Exhibit VI provides the assumptions used in the 2007 rate increase filing, and Exhibit VII provides the assumptions used in the 2011 rate increase filing.

**6. Marketing Method**

This policy form was marketed by agents of RiverSource Life.

**7. Underwriting Description**

This policy form was fully underwritten with the use of various underwriting tools in addition to the application, which may have included medical records, an attending physician's statement, telephone interview and/or face-to-face assessment.

**8. Premiums**

Premiums are unisex and payable for life. The premiums vary by issue age, the initial amount of the facility and home and community care daily maximum benefit amounts, the maximum lifetime benefit amount, the deductible period, the Benefit Increase Option, and marital status at issue.

**9. Issue Age Range**

The issue ages are from 40 to 79 except for the benefit structures with 90-day deductible period, 2- or 4-year maximum policy benefit, and home and community care daily maximum 50% or 75% of facility care daily maximum, which are issued to age 84.

**10. Area Factors**

Area factors are not used for this product.

**11. Premium Modalization Rules**

The following modal factors and nationwide percent distributions (based on inforce count as of 3/31/2013) are applied to the annual premium (AP):

<b>Premium Mode</b>	<b>Modal Factors</b>	<b>Percent Distribution</b>
Annual	$1.0000*AP + 0.0$	39.5%
Semi-Annual	$0.5020*AP + 0.4$	6.3%
Quarterly	$0.2580*AP + 0.5$	7.2%

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Monthly	0.0868*AP+ 0.6	47.0%
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**12. Active Life Reserves**

Active life reserves, although they have significant impact, have not been used in this rate increase analysis, except as described in Exhibits X and XI.

**13. Trend Assumptions**

As this is not medical insurance, we have not included any explicit medical cost trends in the projections.

**14. Past and Future Policy Experience**

Nationwide experience for policy form 30160A, subject to endorsement form 32100, is shown in Exhibit VIII, and Virginia experience for policy form 30160A-VA, subject to endorsement form 32100, is shown in Exhibit IX. Exhibit X shows nationwide past experience including earned premiums, incurred claims, increase in active life reserves and incurred loss ratios by calendar year, and Exhibit XI shows corresponding Virginia experience. These exhibits include any previously implemented rate increases as described in Section 15 of this memorandum.

Please note that RiverSource Life does not consider Virginia-specific experience as fully credible but is providing it as required. The proposed rates have been developed using nationwide experience.

Historical experience is shown by claim incurral year with the loss ratio for each calendar year. The following formula provides an illustration of the historical incurred loss ratio calculation for each calendar year:

$$ILR_j = \frac{\sum_k \sum_t {}_j Pmt_t^k * v^{t-k} + \sum_k ({}_j CR_{ValDate}^k + {}_j IBNR_{ValDate}^k) * v^{ValDate-k}}{EP_j}$$

$ILR_j$  = incurred loss ratio for year  $j$

${}_j Pmt_t^k$  = claim payments at time  $t$  on claims incurred at time  $k$  in year  $j$

${}_j CR_{ValDate}^k$  = open claim reserve held on March 31, 2013 for claims incurred at time  $k$  in year  $j$

${}_j IBNR_{ValDate}^k$  = incurred but not reported reserve as of March 31, 2013 attributable to claims incurred at time  $k$  in year  $j$

$EP_j$  = earned premium in year  $j$

$ValDate$  = March 31, 2013

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$j$  = year of claim incurral

$k$  = date of claim incurral

$t$  = date of claim payment

$v = 1 / 1.045 = 0.956938$

A historical annual paid loss ratio is calculated, with and without interest, as historical paid claims divided by historical earned premiums, where paid claims are calculated as the actual claims paid in that year. A historical annual incurred loss ratio is calculated, with and without interest, as historical incurred claims divided by historical earned premiums. Actual historical incurred claims used in Exhibits VIII, IX, X and XI are determined by discounting claim payments and open claim reserves to the actual original loss date for each claim and by discounting IBNR to the time it is assumed to occur. Actual historical earned premiums used in Exhibits VIII, IX, X and XI are calculated based on the issue and, if appropriate, termination date for each policy. These items are then summed to produce a total for each calendar year. For purposes of accumulating historical experience for a historical or for a lifetime loss ratio calculation, these calendar year totals are assumed to represent a mid-year value.

A future annual paid loss ratio is calculated, with and without interest, as anticipated paid claims divided by anticipated earned premiums. A future annual incurred loss ratio is calculated, with and without interest, as anticipated incurred claims divided by anticipated earned premiums. The anticipated earned premiums, paid claims and incurred claims are projected on a seriatim basis and then summed to produce a total for each calendar year. For purposes of accumulating experience for an anticipated or for a lifetime loss ratio calculation, these calendar year totals are assumed to represent a mid-year value.

Lifetime loss ratios in Exhibits VIII and IX are as of March 31, 2013 and are calculated as the sum of accumulated historical experience and discounted future experience where accumulation and discounting of the total for each calendar year occur at 5.0%, an interest rate consistent with that assumed in the determination of premiums at the time of original pricing, and assume mid-year values.

The incurred loss ratio in Exhibits X and XI is defined as the sum of incurred claims and increase in active life reserves divided by earned premiums. The values in these exhibits are shown without interest accumulation.

### 15. History of Previous Rate Revisions

Two prior increases have been approved and implemented on this form. A 10% increase was approved in June 2007 and implemented on each contract's next policy anniversary beginning in September 2007. A 10% increase was approved in November 2011 and implemented on each contract's next policy anniversary beginning in March 2012. The actual and projected premiums in Exhibits IX and XI reflect the impact of these increases.

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The actual and projected premiums in Exhibits VIII and X reflect the accumulated rate increases as approved in Virginia and implemented on all policies from 2007 through 2013 on a nationwide basis.

**16. Requested Rate Increase and Demonstration of Satisfaction of Loss Ratio Requirements**

The company is requesting an increase of 10%.

Projected experience assuming this increase is implemented is shown in Exhibits VIII and IX. As shown in these exhibits, the expected lifetime loss ratio with and without the requested rate increase exceeds the minimum loss ratio of 60%.

Current rate tables for this form are included with this memorandum in Exhibit XII, and corresponding rate tables with the requested rate increase are included with this memorandum in Exhibit XIII.

**17. Virginia Average Annual Premium (Annual Premium Based on March 31, 2013 Inforce)**

Before increase:       \$1,690  
After increase:        \$1,859

These values assume all previously approved premium increases have been implemented.

**18. Proposed Effective Date**

This rate increase will apply to policies on their policy anniversary date following a 60-day policyholder notification period.

**19. Nationwide Distribution of Business as of 3/31/2013 (based on inforce count)**

By Issue Age:

<b>Issue Ages</b>	<b>Percent Distribution</b>
<55	37.3%
55-59	27.6%
60-64	20.7%
65-69	9.3%
70-74	3.6%
75-79	1.3%
>79	0.2%

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By Deductible Period:

<b>Deductible Period</b>	<b>Percent Distribution</b>
20-day	19.0%
90-day	81.0%

By Benefit Period:

<b>Benefit Period</b>	<b>Percent Distribution</b>
2-Year	3.0%
4-Year	29.4%
6-Year	30.7%
Unlimited	36.9%

By Inflation Protection Option:

<b>Inflation Option</b>	<b>Percent Distribution</b>
None	6.3%
Simple	35.5%
Compound	58.2%

**20. Number of Policyholders**

As of 3/31/2013, the number of policies and annual premium inforce, assuming all premium increases previously approved in Virginia have been implemented in both the state and nationwide, is:

	<b>Number of Insured</b>	<b>Annual Premium</b>
Virginia	1,647	\$2,784,003
Nationwide	30,369	\$52,522,627

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**21. Actuarial Certification**

I am a Fellow of the Society of Actuaries and a Member of the American Academy of Actuaries, and I meet the Academy's qualification standards for preparing health rate filings and to render the actuarial opinion contained herein.

I believe this rate filing is in compliance with the applicable laws of the State of Virginia and with the rules of the Bureau. This memorandum has been prepared in conformity with all applicable Actuarial Standards of Practice, including ASOP No. 8.

I hereby certify that, to the best of my knowledge and judgment, this rate submission is in compliance with the applicable laws and regulations of the state where it is filed. Furthermore, the actuarial assumptions are appropriate. In my opinion, the rates are not excessive or unfairly discriminatory. The premiums are reasonable in relation to the benefits based on the loss ratio standard set forth in 14 VAC 5-200-150(B).



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Anju Gupta-Lavey, FSA, MAAA  
Actuary  
RiverSource Life Insurance Company  
Date: February 19, 2014

**EXHIBIT I**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Original Pricing Assumptions:**

**Mortality:** 1983 Individual Annuitant Mortality Table

**Lapse Rates:**

Duration	Issue Age				
	45	55	65	75	82
1	10%	9%	8%	7%	6%
2	9%	8%	7%	6%	5%
3	8%	7%	6%	5%	4%
4	7%	6%	5%	4%	3%
5	6%	5%	5%	4%	3%
6+	5%	5%	5%	4%	3%

**Morbidity:**

Starting in 1989, RiverSource Life marketed nursing home policies with a zero day prior hospitalization requirement. Using the emerging experience on this business, statistics from the "1985 National Nursing Home Survey" published by the National Center for Health Statistics, and input provided from RiverSource Life's reinsurer, the expected frequencies and severities of claims were developed for nursing home benefits. Incidence rates by issue age and duration were developed to reflect the effects of underwriting on nursing home claims incidence. It was understood that the underwriting process would include an assessment of functional and cognitive abilities if considered appropriate.

Starting in 1990, RiverSource Life also marketed home health care benefit riders. At the time of original pricing, only limited insured experience was available for home health and community care benefits. Therefore the expected claim costs for these benefits were derived from general population data with the assistance of RiverSource Life's reinsurer. Both the incidence rates and the length of home health care usage for the first two years were determined through analysis of the "1982-1984 National Long Term Care Surveys", which polled elderly people who manifested impairments in ADLs. The home health care incidence rates were modified by loading for cognitive impairment as a benefit trigger.

The data from the "1985 National Nursing Home Survey" was used to extrapolate the length of home health care usage after the first two years. Additionally, experience data from continuing care retirement communities was used to verify the claim cost assumptions and to provide guidance in translating general population experience to anticipated insured population experience. Incidence rates by issue age and duration were developed to reflect the effects of underwriting on home health care claims incidence.

Claim costs for the Benefit Increase Options were based on these claim costs with the benefit loaded to reflect the scheduled increases in benefits. The nonforfeiture benefit claim costs were determined by assumptions consistent with those used in establishing premium rates. The above described experience was also used to determine marital discounts.

It should be recognized that considerable judgment was made with respect to expected claim costs, especially for non-institutional benefits. After using all available data, total expected claim costs were developed that represented reasonable estimates of aggregate long term care experience under the applicable underwriting criteria.

The following selection factors were used:

Duration	Issue Age Band			
	40-59	60-69	70-79	80+
1	40%	35%	30%	20%
2	50%	55%	60%	80%
3	55%	60%	75%	100%
4	60%	65%	90%	100%
5	65%	70%	100%	100%
6	70%	75%	100%	100%
7	75%	80%	100%	100%
8	80%	90%	100%	100%
9	90%	100%	100%	100%
10+	100%	100%	100%	100%

**Interest Rate:** 5.0%

**EXHIBIT I**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Current Assumptions:**

**Mortality:** 1983 Individual Annuitant Mortality Basic Table with selection consistent with experience

**Mortality Selection Factors**

Duration	Issue Age Band					
	<58	58-62	63-67	68-72	73-77	78+
1	20%	20%	25%	20%	20%	25%
2	25%	35%	40%	30%	25%	25%
3	35%	45%	45%	40%	40%	40%
4	40%	50%	45%	45%	45%	45%
5	45%	50%	45%	55%	50%	55%
6	50%	50%	55%	55%	60%	60%
7	50%	55%	60%	60%	65%	65%
8	50%	55%	60%	60%	70%	75%
9	50%	55%	65%	70%	75%	85%
10	60%	65%	70%	75%	75%	85%
11	60%	70%	70%	80%	75%	85%
12	60%	70%	70%	80%	90%	90%
13	60%	70%	75%	85%	90%	95%
14	60%	75%	75%	90%	90%	95%
15	60%	75%	80%	90%	95%	95%
16	75%	75%	80%	90%	95%	100%
17	75%	75%	80%	95%	100%	100%
18	75%	75%	80%	95%	100%	100%
19	75%	80%	80%	95%	100%	100%
20	75%	80%	90%	95%	100%	100%
21	75%	80%	90%	100%	100%	100%
22	80%	85%	90%	100%	100%	100%
23	80%	85%	95%	100%	100%	100%
24	85%	90%	95%	100%	100%	100%
25	90%	90%	100%	100%	100%	100%
26	90%	90%	100%	100%	100%	100%
27	90%	90%	100%	100%	100%	100%
28	90%	95%	100%	100%	100%	100%
29	90%	95%	100%	100%	100%	100%
30	90%	100%	100%	100%	100%	100%
31	90%	100%	100%	100%	100%	100%
32	95%	100%	100%	100%	100%	100%
33	95%	100%	100%	100%	100%	100%
34	95%	100%	100%	100%	100%	100%
35+	100%	100%	100%	100%	100%	100%

**EXHIBIT I**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Current Assumptions (continued):**

**Lapse Rates:**

Duration	Lifetime Benefit			Duration	Non-Lifetime Benefit		
	Issue Age Band				Issue Age Band		
	<63	63-72	73+		<63	63-72	73+
1	6.9%	6.8%	7.0%	1	6.9%	7.1%	5.3%
2	6.5%	4.5%	3.5%	2	6.0%	4.8%	4.6%
3	4.8%	3.5%	3.5%	3	4.2%	3.3%	3.1%
4	3.6%	2.6%	1.9%	4	3.1%	2.9%	2.9%
5	2.6%	1.9%	1.3%	5	2.3%	2.0%	2.2%
6	1.9%	1.6%	1.3%	6	1.7%	1.9%	2.1%
7	1.5%	1.1%	1.3%	7	1.5%	1.6%	2.3%
8	1.1%	1.1%	1.3%	8	1.2%	1.4%	2.5%
9	1.1%	1.1%	1.3%	9	1.2%	1.3%	2.7%
10	0.8%	1.1%	1.3%	10	1.0%	1.3%	3.4%
11	0.7%	0.9%	1.4%	11	1.0%	1.5%	3.9%
12	0.7%	0.9%	1.5%	12	0.9%	1.5%	4.0%
13	0.7%	0.9%	1.5%	13	0.8%	1.5%	4.4%
14	0.7%	0.9%	1.6%	14	0.8%	1.5%	4.8%
15	0.7%	0.9%	1.6%	15	0.7%	1.6%	4.9%
16	0.7%	1.0%	1.7%	16	0.7%	1.8%	5.4%
17	0.7%	1.1%	1.7%	17	0.8%	2.0%	5.4%
18	0.7%	1.2%	1.8%	18	0.8%	2.2%	5.4%
19	0.7%	1.2%	1.8%	19	0.9%	2.4%	5.4%
20	0.8%	1.2%	1.9%	20	0.9%	2.6%	5.4%
21	0.8%	1.3%	1.9%	21	0.9%	2.8%	5.4%
22	0.8%	1.3%	2.0%	22	0.9%	3.0%	5.4%
23	0.8%	1.4%	2.0%	23	1.0%	3.2%	5.4%
24	0.9%	1.4%	2.0%	24	1.2%	3.4%	5.4%
25	0.9%	1.4%	2.0%	25	1.4%	3.6%	5.4%
26	0.9%	1.4%	2.0%	26	1.5%	3.8%	5.4%
27	1.0%	1.4%	2.0%	27	1.6%	4.0%	5.4%
28	1.0%	1.4%	2.0%	28	2.1%	4.0%	5.4%
29	1.0%	1.4%	2.0%	29	2.4%	4.0%	5.4%
30	1.0%	1.4%	2.0%	30	2.6%	4.0%	5.4%
31	1.1%	1.4%	2.0%	31	2.9%	4.0%	5.4%
32	1.1%	1.4%	2.0%	32	3.1%	4.0%	5.4%
33	1.1%	1.4%	2.0%	33	3.2%	4.0%	5.4%
34	1.1%	1.4%	2.0%	34	3.3%	4.0%	5.4%
35	1.1%	1.4%	2.0%	35	3.4%	4.0%	5.4%
36+	1.1%	1.4%	2.0%	36+	3.5%	4.0%	5.4%

**EXHIBIT I**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Current Assumptions (continued):**

**Morbidity:** Expected Claim Costs are the product of original pricing expected claim costs and an actual-to-expected adjustment factor. Actual-to-expected adjustment factors were developed from actual emerging experience through anniversaries ending December 2011. Morbidity used in the projections has also been reduced by 5% for anticipated improved claim experience from changes in claim management starting in 2003.

**Lifetime Benefit Actual-to-Expected Adjustment Factors**

Duration	Age at Issue						
	<53	53-57	58-62	63-67	68-72	73-77	78+
1	0.10	0.35	0.35	0.40	0.45	1.20	1.70
2	0.10	0.35	0.35	0.45	0.50	1.25	1.70
3	0.10	0.35	0.35	0.45	0.60	1.25	1.70
4	0.10	0.35	0.35	0.95	0.80	1.30	1.70
5	0.10	0.35	0.35	0.95	0.90	1.30	1.70
6	0.10	0.35	0.35	0.95	1.00	1.35	1.70
7	0.15	0.35	0.40	0.95	1.15	1.40	1.70
8	0.15	0.35	0.50	0.90	1.15	1.35	1.70
9	0.15	0.35	0.60	0.95	1.15	1.45	1.70
10	0.15	0.35	0.60	0.95	1.15	1.50	1.70
11	0.15	0.35	0.65	0.95	1.15	1.50	1.70
12	0.25	0.40	0.65	0.95	1.15	1.50	1.70
13	0.30	0.45	0.70	1.00	1.15	1.50	1.70
14	0.30	0.50	0.75	1.00	1.15	1.50	1.70
15	0.30	0.50	0.75	1.00	1.15	1.50	1.70
16	0.30	0.55	0.75	1.00	1.15	1.50	1.70
17	0.35	0.60	0.80	1.05	1.15	1.50	1.70
18	0.35	0.65	0.80	1.05	1.15	1.50	1.70
19	0.35	0.70	0.80	1.05	1.15	1.60	1.70
20	0.45	0.75	0.85	1.05	1.15	1.60	1.70
21	0.50	0.80	0.85	1.05	1.15	1.60	1.80
22	0.55	0.85	0.85	1.05	1.15	1.70	1.80
23	0.60	0.85	0.90	1.05	1.15	1.70	1.80
24	0.65	0.85	0.90	1.05	1.15	1.70	1.90
25	0.70	0.85	0.90	1.05	1.15	2.00	1.90
26	0.75	0.85	0.95	1.05	1.15	2.00	1.90
27	0.80	0.85	0.95	1.05	1.15	2.10	2.00
28	0.80	0.85	1.00	1.05	1.15	2.10	2.00
29	0.90	0.90	1.00	1.05	1.15	2.10	2.00
30	0.90	0.95	1.05	1.05	1.15	2.10	2.00
31	0.90	0.98	1.08	1.05	1.15	2.10	2.03
32	0.94	0.98	1.08	1.05	1.15	2.10	2.03
33	0.94	0.98	1.08	1.05	1.15	2.10	2.03
34	1.00	0.98	1.08	1.05	1.15	2.10	2.03
35+	1.00	1.00	1.10	1.05	1.15	2.10	2.05

**EXHIBIT I**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Current Assumptions (continued):**

**Morbidity (continued):**

**Non-Lifetime Benefit Actual-to-Expected Adjustment Factors**

Duration	Age at Issue								
	<48	48-52	53-57	58-62	63-67	68-72	73-77	78-82	83+
1	0.10	0.10	0.10	0.20	0.20	0.45	0.65	0.70	1.50
2	0.10	0.10	0.10	0.25	0.30	0.45	0.85	0.90	1.60
3	0.15	0.15	0.15	0.30	0.35	0.55	1.05	0.90	1.70
4	0.20	0.20	0.20	0.40	0.35	0.80	1.15	1.10	2.15
5	0.25	0.25	0.25	0.45	0.45	0.80	1.40	1.40	2.15
6	0.30	0.30	0.35	0.50	0.60	1.00	1.40	1.85	2.15
7	0.30	0.30	0.40	0.55	0.75	1.05	1.45	2.05	2.15
8	0.30	0.30	0.45	0.60	0.85	1.15	1.55	2.30	2.15
9	0.35	0.35	0.55	0.75	0.95	1.20	1.70	2.60	2.20
10	0.40	0.40	0.55	0.80	1.00	1.25	1.70	2.60	2.20
11	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
12	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
13	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
14	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
15	0.45	0.45	0.55	0.95	1.05	1.25	1.75	2.65	2.20
16	0.45	0.45	0.55	0.95	1.05	1.25	1.75	2.65	2.20
17	0.50	0.50	0.60	0.95	1.05	1.25	1.75	2.65	2.20
18	0.50	0.50	0.65	0.95	1.05	1.25	1.75	2.65	2.20
19	0.55	0.55	0.70	0.95	1.05	1.25	1.80	2.65	2.20
20	0.55	0.55	0.80	0.95	1.05	1.25	1.80	2.65	2.20
21	0.60	0.60	0.80	0.95	1.05	1.25	1.80	2.70	2.20
22	0.60	0.60	0.85	0.95	1.05	1.25	1.80	2.70	2.20
23	0.65	0.65	0.85	1.00	1.05	1.25	1.80	2.70	2.20
24	0.65	0.65	0.90	1.00	1.05	1.25	1.90	2.70	2.20
25	0.70	0.70	0.90	1.00	1.05	1.25	1.90	2.70	2.20
26	0.75	0.75	0.95	1.00	1.05	1.25	1.90	2.70	2.20
27	0.80	0.80	0.95	1.00	1.05	1.25	1.90	2.70	2.20
28	0.85	0.85	1.00	1.00	1.05	1.25	1.90	2.70	2.20
29	0.90	0.90	1.00	1.05	1.05	1.25	2.00	2.70	2.20
30	0.90	0.90	1.00	1.05	1.05	1.25	2.00	2.70	2.20
31	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
32	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
33	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
34	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
35+	1.00	1.00	1.00	1.05	1.10	1.25	2.00	2.70	2.20

**Interest Rate:** 5.0%

**EXHIBIT II**  
**RiverSource Life Insurance Company**  
**Nationwide Long Term Care Claim Experience**  
**Policy Years through 2011**  
**Policy Form: 30160A, Subject to Endorsement 32100**  
**Expected Claims Based on Current Assumptions**

<b>SPLIT BY BENEFIT PERIOD AND DURATION</b>									
<b>Duration</b>	<b>Lifetime Benefit Period</b>			<b>Non-Lifetime Benefit Period</b>			<b>All</b>		
	<b>Actual</b>	<b>Expected</b>	<b>A/E</b>	<b>Actual</b>	<b>Expected</b>	<b>A/E</b>	<b>Actual</b>	<b>Expected</b>	<b>A/E</b>
1	567,897	551,181	103.0%	197,412	502,628	39.3%	765,309	1,053,808	72.6%
2	1,270,967	919,703	138.2%	978,154	1,167,961	83.7%	2,249,122	2,087,663	107.7%
3	510,274	1,136,415	44.9%	2,029,044	1,765,729	114.9%	2,539,318	2,902,145	87.5%
4	3,751,141	1,755,258	213.7%	2,640,754	2,617,393	100.9%	6,391,895	4,372,651	146.2%
5	3,104,482	2,128,256	145.9%	2,770,855	3,635,723	76.2%	5,875,337	5,763,978	101.9%
6	1,980,275	2,618,346	75.6%	6,298,342	4,946,927	127.3%	8,278,617	7,565,273	109.4%
7	4,011,625	3,302,962	121.5%	5,684,023	6,267,141	90.7%	9,695,648	9,570,103	101.3%
8	1,878,936	3,980,642	47.2%	7,332,395	7,927,619	92.5%	9,211,331	11,908,261	77.4%
9	3,959,686	4,699,626	84.3%	10,126,649	9,642,295	105.0%	14,086,335	14,341,921	98.2%
10	3,145,402	3,673,031	85.6%	8,312,445	7,450,457	111.6%	11,457,847	11,123,488	103.0%
11	1,836,590	1,614,481	113.8%	3,887,484	3,178,398	122.3%	5,724,074	4,792,879	119.4%
<b>Total</b>	<b>26,017,276</b>	<b>26,379,901</b>	<b>98.6%</b>	<b>50,257,557</b>	<b>49,102,271</b>	<b>102.4%</b>	<b>76,274,832</b>	<b>75,482,171</b>	<b>101.1%</b>

<b>SPLIT BY ISSUE AGE</b>				
<b>Issue Age</b>	<b>Actual</b>	<b>Expected</b>	<b>A/E</b>	<b>Claim Count</b>
<43	87,977	55,797	157.7%	3
43-47	81,878	325,141	25.2%	6
48-52	1,502,970	1,513,269	99.3%	32
53-57	6,694,374	6,965,730	96.1%	105
58-62	11,915,932	13,077,519	91.1%	225
63-67	16,367,499	16,525,731	99.0%	240
68-72	14,796,144	14,426,852	102.6%	230
73-77	15,576,820	14,432,764	107.9%	238
78-82	8,026,013	7,115,306	112.8%	106
83+	1,225,225	1,044,064	117.4%	21
<b>Total</b>	<b>76,274,832</b>	<b>75,482,171</b>	<b>101.1%</b>	<b>1,206</b>

**EXHIBIT III**  
**RiverSource Life Insurance Company**  
**Long-Term Care Mortality Experience**  
**For Policy Anniversaries in 2000 through Policy Anniversaries in 2011**  
**Experience Includes All Long-Term Care Forms Combined**  
**Expressing Deaths in Terms of Policy Count**  
**Expected Deaths Based on Current Assumptions**

<b>SUMMARY BY DURATION</b>				
<b>Duration</b>	<b>Actual Deaths</b>	<b>Expected Deaths</b>	<b>A/E</b>	<b>Difference</b>
1	100	98	102%	2
2	216	218	99%	(2)
3	418	399	105%	19
4	531	544	98%	(13)
5	811	800	101%	11
6	1,130	1,114	101%	16
7	1,470	1,434	103%	36
8	1,731	1,726	100%	5
9	2,149	2,147	100%	2
10	2,544	2,571	99%	(27)
11	2,943	2,918	101%	25
12	2,933	2,964	99%	(31)
13	2,834	2,833	100%	1
14	2,608	2,620	100%	(12)
15	2,428	2,484	98%	(56)
16	2,076	2,096	99%	(20)
17	1,736	1,754	99%	(18)
18	1,449	1,438	101%	11
19	1,150	1,148	100%	2
20	838	876	96%	(38)
21	533	515	104%	18
22	87	81	107%	6
<b>Total</b>	<b>32,715</b>	<b>32,779</b>	<b>100%</b>	<b>(64)</b>

<b>SUMMARY BY ISSUE AGE</b>				
<b>Issue Age</b>	<b>Actual Deaths</b>	<b>Expected Deaths</b>	<b>A/E</b>	<b>Difference</b>
<43	21	18	114%	3
43-47	102	112	91%	(10)
48-52	749	761	98%	(12)
53-57	2,252	2,245	100%	7
58-62	5,142	5,272	98%	(130)
63-67	7,904	7,863	101%	41
68-72	8,117	8,123	100%	(6)
73-77	5,639	5,637	100%	2
78-82	2,426	2,392	101%	34
83+	363	356	102%	7
<b>Total</b>	<b>32,715</b>	<b>32,779</b>	<b>100%</b>	<b>(64)</b>

<b>SUMMARY BY ALL DURATION / ISSUE AGE CELLS</b>			
<b>Actual Deaths</b>	<b>Expected Deaths</b>	<b>A/E</b>	<b>Difference</b>
<b>32,715</b>	<b>32,779</b>	<b>100%</b>	<b>(64)</b>

**EXHIBIT IV**  
**RiverSource Life Insurance Company**  
**Lapses and Benefit Reductions<sup>1</sup>**  
**Nationwide Experience**  
**Experience Includes All Long-Term Care Forms Combined**

<b>Additional Lapses Due to Rate Increase</b>									
<b>Increase Percent</b>	<b>Average Increase</b>	<b>Year of Increase</b>							<b>Weighted Average</b>
		<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	
< 10%	6.7%			0.9%	1.5%	1.7%	0.9%	1.2%	1.3%
10% - 14.9%	10.5%	0.7%	1.7%	1.4%	1.6%	2.0%	1.4%	1.3%	1.5%
15% - 19.9%	15.3%	0.7%	2.5%	1.3%	1.8%	1.8%	1.6%	1.4%	1.7%
20% - 29.9%	23.6%	1.8%	1.7%	1.2%	1.6%	2.5%		4.4%	1.7%
30%+	34.7%	2.9%	2.7%	2.0%	3.7%	13.2%			2.9%
<b>Total</b>	<b>16.3%</b>	<b>2.6%</b>	<b>2.5%</b>	<b>1.3%</b>	<b>1.8%</b>	<b>1.9%</b>	<b>1.5%</b>	<b>1.4%</b>	<b>1.9%</b>

<b>Policies Choosing Reduction in Benefits in Relation to Rate Increase Percentage</b>									
<b>Increase Percent</b>	<b>Average Increase</b>	<b>Year of Increase</b>							<b>Weighted Average</b>
		<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	
< 10%	6.7%			0.3%	0.2%	0.2%	0.4%	0.3%	0.2%
10% - 14.9%	10.5%	0.6%	0.6%	0.5%	0.4%	0.5%	0.4%	0.5%	0.5%
15% - 19.9%	15.3%	1.1%	0.8%	0.3%	0.7%	0.7%	0.6%	0.9%	0.7%
20% - 29.9%	23.6%	1.7%	1.8%	1.8%	1.4%	2.6%		1.8%	1.7%
30%+	34.7%	3.1%	2.8%	2.5%	3.5%	7.3%			3.0%
<b>Total</b>	<b>16.3%</b>	<b>1.4%</b>	<b>1.3%</b>	<b>0.8%</b>	<b>0.7%</b>	<b>0.8%</b>	<b>0.7%</b>	<b>0.8%</b>	<b>0.9%</b>

<sup>1</sup> The total percent reduction in benefit is typically no more than the percentage increase in premium.

**EXHIBIT V**  
**RiverSource Life Insurance Company**  
**Long-Term Care Lapse Experience**  
**For Policy Anniversaries in 2000 through Policy Anniversaries in 2011**  
**Experience Includes All Long-Term Care Forms Combined**  
**Expressing Lapses in Terms of Policy Count**  
**Expected Lapses Based on Current Assumptions**

LIFETIME BENEFIT PERIOD																
Duration	Issue Ages 35-62				Issue Ages 63-72				Issue Ages 73+				All Issue Ages			
	Actual			Expected Lapses	Actual			Expected Lapses	Actual			Expected Lapses	Actual			Expected Lapses
	Lapses	Exposure	Rate		Lapses	Exposure	Rate		Lapses	Exposure	Rate		Lapses	Exposure	Rate	
1	1,352	19,701	6.9%	6.9%	261	3,859	6.8%	6.8%	37	529	7.0%	7.0%	1,650	24,088	6.8%	6.9%
2	1,669	25,851	6.5%	6.5%	265	5,869	4.5%	4.5%	30	856	3.5%	3.5%	1,964	32,576	6.0%	6.1%
3	1,552	32,493	4.8%	4.8%	287	8,144	3.5%	3.5%	42	1,213	3.5%	3.5%	1,881	41,850	4.5%	4.5%
4	1,416	39,280	3.6%	3.6%	265	10,078	2.6%	2.6%	29	1,494	1.9%	1.9%	1,710	50,852	3.4%	3.4%
5	1,270	48,520	2.6%	2.6%	254	13,213	1.9%	1.9%	27	2,028	1.3%	1.3%	1,551	63,762	2.4%	2.4%
6	967	52,208	1.9%	1.9%	255	15,516	1.6%	1.6%	31	2,497	1.2%	1.3%	1,253	70,220	1.8%	1.8%
7	773	52,358	1.5%	1.5%	195	16,645	1.2%	1.1%	48	2,770	1.7%	1.3%	1,016	71,773	1.4%	1.4%
8	550	50,915	1.1%	1.1%	195	17,353	1.1%	1.1%	38	2,869	1.3%	1.3%	783	71,137	1.1%	1.1%
9	493	47,100	1.0%	1.1%	187	17,389	1.1%	1.1%	31	2,889	1.1%	1.3%	711	67,378	1.1%	1.1%
10	357	40,122	0.9%	0.8%	211	17,181	1.2%	1.1%	30	2,901	1.0%	1.3%	598	60,204	1.0%	0.9%
11	305	36,986	0.8%	0.7%	191	18,519	1.0%	0.9%	33	3,222	1.0%	1.4%	529	58,727	0.9%	0.8%
12	199	29,615	0.7%	0.7%	143	16,808	0.9%	0.9%	40	2,851	1.4%	1.5%	382	49,274	0.8%	0.8%
13	149	22,459	0.7%	0.7%	124	14,003	0.9%	0.9%	31	2,249	1.4%	1.5%	304	38,712	0.8%	0.8%
14	108	17,892	0.6%	0.7%	86	10,942	0.8%	0.9%	29	1,645	1.8%	1.6%	223	30,479	0.7%	0.8%
15	86	13,422	0.6%	0.7%	78	8,200	1.0%	0.9%	18	1,121	1.6%	1.6%	182	22,743	0.8%	0.8%
16	59	8,071	0.7%	0.7%	60	5,560	1.1%	1.0%	19	703	2.7%	1.7%	138	14,335	1.0%	0.9%
17	42	6,305	0.7%	0.7%	55	4,818	1.1%	1.1%	14	552	2.5%	1.7%	111	11,675	1.0%	0.9%
18	19	4,360	0.4%	0.7%	46	3,720	1.2%	1.2%	10	379	2.6%	1.8%	75	8,459	0.9%	1.0%
19	19	2,351	0.8%	0.7%	30	2,026	1.5%	1.2%	3	186	1.6%	1.8%	52	4,563	1.1%	1.0%
20	12	1,137	1.1%	0.8%	19	984	1.9%	1.2%	2	69	2.9%	1.9%	33	2,190	1.5%	1.0%
21	7	907	0.8%	0.8%	10	840	1.2%	1.3%	2	60	3.3%	1.9%	19	1,807	1.1%	1.1%
22	4	285	1.4%	0.8%	3	251	1.2%	1.3%	0	18	0.0%	2.0%	7	554	1.3%	1.1%
<b>All Durations</b>	<b>11,408</b>	<b>552,338</b>	<b>2.1%</b>	<b>2.1%</b>	<b>3,220</b>	<b>211,917</b>	<b>1.5%</b>	<b>1.5%</b>	<b>544</b>	<b>33,102</b>	<b>1.6%</b>	<b>1.6%</b>	<b>15,172</b>	<b>797,357</b>	<b>1.9%</b>	<b>1.9%</b>
<b>Durations 8 and later</b>	<b>2,409</b>	<b>281,927</b>	<b>0.9%</b>	<b>0.9%</b>	<b>1,438</b>	<b>138,594</b>	<b>1.0%</b>	<b>1.0%</b>	<b>300</b>	<b>21,715</b>	<b>1.4%</b>	<b>1.4%</b>	<b>4,147</b>	<b>442,236</b>	<b>0.9%</b>	<b>0.9%</b>

NON-LIFETIME BENEFIT PERIOD																
Duration	Issue Ages 35-62				Issue Ages 63-72				Issue Ages 73+				All Issue Ages			
	Actual			Expected Lapses	Actual			Expected Lapses	Actual			Expected Lapses	Actual			Expected Lapses
	Lapses	Exposure	Rate		Lapses	Exposure	Rate		Lapses	Exposure	Rate		Lapses	Exposure	Rate	
1	1,927	27,994	6.9%	6.9%	677	9,598	7.1%	7.1%	116	2,177	5.3%	5.3%	2,720	39,770	6.8%	6.9%
2	2,079	34,647	6.0%	6.0%	644	13,309	4.8%	4.8%	151	3,289	4.6%	4.6%	2,874	51,244	5.6%	5.6%
3	1,599	38,297	4.2%	4.2%	542	16,222	3.3%	3.3%	128	4,194	3.1%	3.1%	2,269	58,713	3.9%	3.9%
4	1,227	39,300	3.1%	3.1%	503	17,424	2.9%	2.9%	134	4,614	2.9%	2.9%	1,864	61,338	3.0%	3.0%
5	975	41,636	2.3%	2.3%	391	19,997	2.0%	2.0%	124	5,566	2.2%	2.2%	1,490	67,199	2.2%	2.2%
6	712	40,884	1.7%	1.7%	408	21,641	1.9%	1.9%	133	6,387	2.1%	2.1%	1,253	68,912	1.8%	1.8%
7	566	37,665	1.5%	1.5%	325	21,705	1.5%	1.6%	149	6,647	2.2%	2.3%	1,040	66,016	1.6%	1.6%
8	431	36,886	1.2%	1.2%	316	22,005	1.4%	1.4%	150	6,595	2.3%	2.5%	897	65,486	1.4%	1.4%
9	381	35,498	1.1%	1.2%	288	21,531	1.3%	1.3%	155	6,296	2.5%	2.7%	824	63,325	1.3%	1.4%
10	249	26,568	0.9%	1.0%	212	18,992	1.1%	1.3%	183	5,718	3.2%	3.4%	644	51,279	1.3%	1.4%
11	191	20,698	0.9%	1.0%	278	17,899	1.6%	1.5%	194	5,405	3.6%	3.9%	663	44,002	1.5%	1.6%
12	160	15,654	1.0%	0.9%	220	15,368	1.4%	1.5%	168	4,416	3.8%	4.0%	548	35,437	1.5%	1.5%
13	91	10,814	0.8%	0.8%	180	12,036	1.5%	1.5%	142	3,301	4.3%	4.4%	413	26,151	1.6%	1.6%
14	57	7,737	0.7%	0.8%	120	9,125	1.3%	1.5%	124	2,299	5.4%	4.8%	301	19,162	1.6%	1.6%
15	42	6,206	0.7%	0.7%	125	7,199	1.7%	1.6%	79	1,598	4.9%	4.9%	246	15,003	1.6%	1.6%
16	29	4,142	0.7%	0.7%	95	4,881	1.9%	1.8%	57	1,009	5.7%	5.4%	181	10,032	1.8%	1.7%
17	29	2,850	1.0%	0.8%	74	3,802	1.9%	2.0%	41	718	5.7%	5.4%	144	7,371	2.0%	1.9%
18	16	1,970	0.8%	0.8%	50	2,831	1.8%	2.2%	27	468	5.8%	5.4%	93	5,269	1.8%	2.0%
19	14	1,133	1.2%	0.9%	36	1,601	2.2%	2.4%	9	219	4.1%	5.4%	59	2,952	2.0%	2.0%
20	7	560	1.3%	0.9%	28	811	3.5%	2.6%	4	106	3.8%	5.4%	39	1,476	2.6%	2.2%
21	5	319	1.6%	0.9%	15	508	3.0%	2.8%	3	54	5.5%	5.4%	23	881	2.6%	2.3%
22	0	123	0.0%	0.9%	2	144	1.4%	3.0%	1	13	7.6%	5.4%	3	280	1.1%	2.2%
<b>All Durations</b>	<b>10,787</b>	<b>431,579</b>	<b>2.5%</b>	<b>2.5%</b>	<b>5,529</b>	<b>258,630</b>	<b>2.1%</b>	<b>2.2%</b>	<b>2,272</b>	<b>71,088</b>	<b>3.2%</b>	<b>3.3%</b>	<b>18,588</b>	<b>761,298</b>	<b>2.4%</b>	<b>2.5%</b>
<b>Durations 8 and later</b>	<b>1,702</b>	<b>171,157</b>	<b>1.0%</b>	<b>1.0%</b>	<b>2,039</b>	<b>138,734</b>	<b>1.5%</b>	<b>1.5%</b>	<b>1,337</b>	<b>38,215</b>	<b>3.5%</b>	<b>3.6%</b>	<b>5,078</b>	<b>348,106</b>	<b>1.5%</b>	<b>1.5%</b>

**EXHIBIT VI**  
**RiverSource Life Insurance Company**  
**Prior 2007 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2007 Rate Increase Filing Assumptions:**

**Mortality:** 1983 Individual Annuitant Mortality Basic Table with selection consistent with experience.

**Mortality Selection Factors**

Duration	Issue Age Band					
	<58	58-62	63-67	68-72	73-77	78+
1	20%	20%	20%	20%	20%	20%
2	25%	25%	30%	30%	25%	25%
3	35%	35%	45%	50%	35%	35%
4	45%	45%	45%	50%	35%	35%
5	50%	50%	45%	50%	40%	40%
6	55%	55%	55%	60%	70%	75%
7	55%	55%	55%	65%	75%	75%
8	55%	55%	60%	65%	75%	75%
9	55%	55%	75%	80%	85%	85%
10	80%	80%	75%	80%	85%	85%
11	80%	80%	75%	85%	85%	95%
12	85%	85%	85%	90%	90%	100%
13	85%	85%	85%	90%	90%	100%
14	90%	90%	85%	90%	95%	100%
15	95%	95%	90%	95%	100%	100%
16	95%	95%	90%	95%	100%	100%
17	95%	95%	95%	95%	100%	100%
18	95%	95%	100%	100%	100%	100%
19	95%	95%	100%	100%	100%	100%
20+	100%	100%	100%	100%	100%	100%

**EXHIBIT VI**  
**RiverSource Life Insurance Company**  
**Prior 2007 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2007 Rate Increase Filing Assumptions (continued):**

**Lapse Rates:**

Duration	Lifetime Benefit		
	Issue Age Band		
	<63	63-72	73+
1	6.5%	5.2%	5.0%
2	6.5%	4.2%	2.8%
3	4.9%	2.1%	3.5%
4	2.9%	2.1%	1.3%
5	2.6%	1.2%	1.2%
6	1.8%	1.3%	1.0%
7	1.9%	1.0%	1.0%
8	1.0%	1.0%	1.0%
9	0.9%	1.1%	1.3%
10	0.9%	1.0%	1.3%
11	0.9%	0.9%	1.3%
12	0.9%	0.9%	1.3%
13	0.9%	0.9%	1.3%
14	0.9%	0.9%	1.3%
15	0.9%	0.9%	1.3%
16	0.9%	1.0%	1.3%
17	0.9%	1.1%	1.3%
18	0.9%	1.1%	1.3%
19	0.9%	1.1%	1.3%
20	0.9%	1.1%	1.3%
21	0.9%	1.1%	1.3%
22	0.9%	1.1%	1.3%
23	0.9%	1.1%	1.3%
24	0.9%	1.1%	1.3%
25	0.9%	1.1%	1.3%
26	0.9%	1.1%	1.3%
27	1.0%	1.1%	1.3%
28	1.0%	1.1%	1.3%
29	1.0%	1.1%	1.3%
30	1.0%	1.1%	1.3%
31	1.0%	1.1%	1.3%
32	1.0%	1.1%	1.3%
33	1.0%	1.1%	1.3%
34	1.0%	1.1%	1.3%
35	1.0%	1.1%	1.3%
36	1.0%	1.1%	1.3%
37+	1.0%	1.1%	1.3%

Duration	Non-Lifetime Benefit		
	Issue Age Band		
	<63	63-72	73+
1	6.0%	5.4%	5.2%
2	5.6%	4.1%	3.9%
3	4.3%	3.0%	2.6%
4	2.8%	1.8%	2.0%
5	2.2%	2.6%	2.8%
6	1.7%	1.3%	1.8%
7	1.0%	1.0%	1.3%
8	1.0%	1.3%	1.5%
9	1.2%	1.3%	3.0%
10	1.2%	1.3%	3.5%
11	1.2%	1.3%	4.0%
12	1.2%	1.3%	4.2%
13	1.2%	1.3%	4.3%
14	1.2%	1.3%	4.4%
15	1.2%	1.6%	4.5%
16	1.2%	1.8%	4.5%
17	1.2%	2.0%	4.5%
18	1.2%	2.6%	4.5%
19	1.2%	2.8%	4.5%
20	1.2%	3.0%	4.5%
21	1.2%	3.5%	4.5%
22	1.2%	3.7%	4.5%
23	1.2%	3.8%	4.5%
24	1.2%	3.9%	4.5%
25	1.4%	4.0%	4.5%
26	1.5%	4.0%	4.5%
27	1.6%	4.0%	4.5%
28	2.1%	4.0%	4.5%
29	2.4%	4.0%	4.5%
30	2.6%	4.0%	4.5%
31	2.9%	4.0%	4.5%
32	3.1%	4.0%	4.5%
33	3.2%	4.0%	4.5%
34	3.3%	4.0%	4.5%
35	3.4%	4.0%	4.5%
36	3.5%	4.0%	4.5%
37+	3.5%	4.0%	4.5%

**EXHIBIT VI**  
**RiverSource Life Insurance Company**  
**Prior 2007 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2007 Rate Increase Filing Assumptions (continued):**

**Morbidity:** Expected Claim Costs are the product of original pricing expected claim costs and an actual-to-expected adjustment factor (provided below). Morbidity used in the projections has also been reduced by 5% for anticipated improved claim experience from changes in claim management starting in 2003. Actual-to-expected adjustment factors were developed from actual emerging experience through anniversaries ending September 2005.

Duration	Actual-to-Expected Factor
1	0.600
2	0.650
3	0.700
4	0.750
5	0.800
6	0.850
7	0.900
8	0.950
9	1.000
10+	1.000

**Interest Rate:** 5.0%

**EXHIBIT VII**  
**RiverSource Life Insurance Company**  
**Prior 2011 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2011 Rate Increase Filing Assumptions:**

**Mortality:** 1983 Individual Annuitant Mortality Basic Table with selection consistent with experience

<b>Mortality Selection Factors</b>						
Duration	Issue Age Band					
	<58	58-62	63-67	68-72	73-77	78+
1	20%	20%	25%	20%	20%	25%
2	25%	35%	40%	30%	25%	25%
3	35%	45%	45%	45%	40%	35%
4	40%	50%	45%	45%	45%	35%
5	45%	50%	45%	55%	50%	55%
6	50%	50%	55%	55%	60%	60%
7	55%	55%	60%	60%	65%	65%
8	55%	55%	60%	60%	70%	75%
9	55%	55%	70%	75%	75%	85%
10	55%	65%	70%	80%	75%	85%
11	65%	70%	70%	80%	75%	85%
12	65%	70%	70%	80%	85%	90%
13	65%	70%	75%	85%	95%	100%
14	65%	75%	75%	90%	95%	100%
15	70%	75%	75%	90%	95%	100%
16	70%	75%	85%	90%	95%	100%
17	70%	75%	85%	90%	100%	100%
18	75%	75%	85%	90%	100%	100%
19	85%	75%	85%	95%	100%	100%
20	85%	80%	90%	100%	100%	100%
21	85%	85%	90%	100%	100%	100%
22	85%	85%	90%	100%	100%	100%
23	85%	85%	95%	100%	100%	100%
24	85%	90%	95%	100%	100%	100%
25	90%	90%	100%	100%	100%	100%
26	90%	90%	100%	100%	100%	100%
27	90%	90%	100%	100%	100%	100%
28	90%	95%	100%	100%	100%	100%
29	90%	95%	100%	100%	100%	100%
30	90%	100%	100%	100%	100%	100%
31	90%	100%	100%	100%	100%	100%
32	95%	100%	100%	100%	100%	100%
33	95%	100%	100%	100%	100%	100%
34	95%	100%	100%	100%	100%	100%
35+	100%	100%	100%	100%	100%	100%

**EXHIBIT VII**  
**RiverSource Life Insurance Company**  
**Prior 2011 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2011 Rate Increase Filing Assumptions**

**Lapse Rates:**

Duration	Lifetime Benefit		
	Issue Age Band		
	<63	63-72	73+
1	6.8%	6.7%	6.8%
2	6.4%	4.4%	3.4%
3	4.7%	3.5%	3.4%
4	3.6%	2.6%	1.9%
5	2.6%	1.9%	1.3%
6	1.6%	1.7%	1.3%
7	1.4%	1.1%	1.3%
8	1.0%	1.1%	1.3%
9	1.0%	1.1%	1.3%
10	0.8%	1.0%	1.3%
11	0.7%	0.9%	1.4%
12	0.7%	0.9%	1.5%
13	0.7%	0.9%	1.5%
14	0.7%	0.9%	1.6%
15	0.7%	0.9%	1.6%
16	0.7%	1.0%	1.7%
17	0.7%	1.1%	1.8%
18	0.7%	1.2%	1.8%
19	0.7%	1.2%	1.8%
20	0.8%	1.2%	1.8%
21	0.8%	1.3%	1.8%
22	0.8%	1.3%	1.8%
23	0.8%	1.4%	1.8%
24	0.9%	1.4%	1.8%
25	0.9%	1.4%	1.8%
26	0.9%	1.4%	1.8%
27	1.0%	1.4%	1.8%
28	1.0%	1.4%	1.8%
29	1.0%	1.4%	1.8%
30	1.0%	1.4%	1.8%
31	1.1%	1.4%	1.8%
32	1.1%	1.4%	1.8%
33	1.1%	1.4%	1.8%
34	1.1%	1.4%	1.8%
35	1.1%	1.4%	1.8%
36+	1.1%	1.4%	1.8%

Duration	Non-Lifetime Benefit		
	Issue Age Band		
	<63	63-72	73+
1	6.9%	7.1%	5.4%
2	6.0%	4.9%	4.6%
3	4.2%	3.4%	3.1%
4	3.1%	2.9%	2.9%
5	2.4%	2.0%	2.3%
6	1.8%	1.8%	2.3%
7	1.4%	1.6%	2.4%
8	1.2%	1.3%	2.6%
9	1.2%	1.3%	2.8%
10	1.1%	1.3%	3.5%
11	1.0%	1.4%	4.0%
12	0.9%	1.4%	4.2%
13	0.8%	1.4%	4.4%
14	0.8%	1.5%	4.7%
15	0.8%	1.6%	4.9%
16	0.8%	1.8%	5.1%
17	0.8%	2.0%	5.3%
18	0.8%	2.2%	5.4%
19	0.9%	2.4%	5.4%
20	0.9%	2.6%	5.4%
21	0.9%	2.8%	5.4%
22	0.9%	3.0%	5.4%
23	1.0%	3.2%	5.4%
24	1.2%	3.4%	5.4%
25	1.4%	3.6%	5.4%
26	1.5%	3.8%	5.4%
27	1.6%	4.0%	5.4%
28	2.1%	4.0%	5.4%
29	2.4%	4.0%	5.4%
30	2.6%	4.0%	5.4%
31	2.9%	4.0%	5.4%
32	3.1%	4.0%	5.4%
33	3.2%	4.0%	5.4%
34	3.3%	4.0%	5.4%
35	3.4%	4.0%	5.4%
36+	3.5%	4.0%	5.4%

**EXHIBIT VII**  
**RiverSource Life Insurance Company**  
**Prior 2011 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2011 Rate Increase Filing Assumptions (cont):**

**Morbidity:** Expected Claim Costs are the product of original pricing expected claim costs and an actual-to-expected adjustment factor. Morbidity used in the projections has also been reduced by 5% for anticipated improved claim experience from changes in claim management starting in 2003. Actual-to-expected adjustment factors were developed from actual emerging experience through anniversaries ending December 2009.

**Lifetime Benefit Actual-to-Expected Adjustment Factors**

Duration	Age at Issue							
	<48	48-52	53-57	58-62	63-67	68-72	73-77	78+
1	0.10	0.10	0.20	0.20	0.30	0.30	1.05	1.45
2	0.08	0.10	0.25	0.25	0.30	0.30	1.05	1.45
3	0.07	0.10	0.30	0.30	0.30	0.30	1.05	1.45
4	0.07	0.10	0.30	0.30	0.95	1.00	1.05	1.60
5	0.06	0.10	0.30	0.30	0.95	1.00	1.05	1.60
6	0.06	0.10	0.30	0.30	0.95	1.00	1.05	1.60
7	0.07	0.10	0.30	0.30	0.95	1.00	1.05	1.60
8	0.07	0.25	0.35	0.40	0.95	1.05	1.20	1.60
9	0.07	0.30	0.35	0.40	0.95	1.05	1.25	1.60
10	0.07	0.30	0.35	0.50	0.95	1.15	1.25	1.60
11	0.07	0.30	0.35	0.55	0.95	1.15	1.25	1.60
12	0.07	0.30	0.40	0.60	0.95	1.15	1.25	1.60
13	0.20	0.35	0.40	0.65	0.95	1.15	1.25	1.60
14	0.27	0.35	0.40	0.70	0.95	1.15	1.25	1.60
15	0.30	0.35	0.50	0.75	0.95	1.15	1.25	1.60
16	0.30	0.35	0.55	0.80	0.95	1.15	1.25	1.60
17	0.30	0.40	0.60	0.85	0.95	1.15	1.25	1.60
18	0.35	0.40	0.65	0.85	0.95	1.15	1.25	1.60
19	0.35	0.40	0.70	0.85	0.95	1.15	1.25	1.60
20	0.35	0.50	0.75	0.85	0.95	1.15	1.25	1.60
21	0.35	0.55	0.80	0.90	1.00	1.15	1.30	1.60
22	0.40	0.60	0.85	0.90	1.00	1.15	1.30	1.60
23	0.40	0.65	0.85	0.90	1.00	1.15	1.30	1.60
24	0.40	0.70	0.85	0.95	1.00	1.15	1.30	1.60
25	0.50	0.75	0.85	0.95	1.00	1.15	1.30	1.60
26	0.55	0.80	0.85	1.00	1.00	1.15	1.30	1.60
27	0.60	0.85	0.85	1.00	1.00	1.15	1.30	1.60
28	0.65	0.85	0.85	1.00	1.00	1.15	1.30	1.60
29	0.70	0.85	0.90	1.00	1.00	1.15	1.30	1.60
30	0.75	0.85	0.95	1.00	1.00	1.15	1.30	1.60
31	0.80	0.90	1.00	1.00	1.00	1.15	1.30	1.60
32	0.85	0.90	1.00	1.00	1.00	1.15	1.30	1.60
33	0.85	0.95	1.00	1.00	1.00	1.15	1.30	1.60
34	0.85	0.95	1.00	1.00	1.00	1.15	1.30	1.60
35	0.85	1.00	1.00	1.00	1.00	1.15	1.30	1.60
36	0.90	1.00	1.00	1.00	1.00	1.15	1.30	1.60
37	0.90	1.00	1.00	1.00	1.00	1.15	1.30	1.60
38	0.95	1.00	1.00	1.00	1.00	1.15	1.30	1.60
39	0.95	1.00	1.00	1.00	1.00	1.15	1.30	1.60
40+	1.00	1.00	1.00	1.00	1.00	1.15	1.30	1.60

**EXHIBIT VII**  
**RiverSource Life Insurance Company**  
**Prior 2011 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2011 Rate Increase Filing Assumptions (cont):**

**Morbidity (continued):**

Duration	Non-Lifetime Benefit Actual-to-Expected Adjustment Factors								
	Age at Issue								
	<48	48-52	53-57	58-62	63-67	68-72	73-77	78-82	83+
1	0.10	0.10	0.10	0.25	0.25	0.50	0.50	0.50	1.25
2	0.08	0.15	0.15	0.25	0.25	0.50	0.65	0.75	1.25
3	0.07	0.15	0.15	0.40	0.35	0.60	0.65	0.75	1.45
4	0.07	0.15	0.15	0.40	0.35	0.60	0.65	0.75	2.00
5	0.06	0.15	0.15	0.40	0.35	0.60	1.30	0.75	2.00
6	0.06	0.15	0.35	0.45	0.65	1.10	1.30	1.50	2.00
7	0.10	0.15	0.35	0.45	0.85	1.10	1.30	1.60	2.00
8	0.10	0.25	0.35	0.60	0.90	1.25	1.30	1.70	2.00
9	0.10	0.25	0.35	0.70	1.00	1.25	1.30	1.70	2.00
10	0.10	0.25	0.35	0.70	1.05	1.25	1.30	1.70	2.00
11	0.11	0.30	0.35	0.70	1.05	1.25	1.30	1.70	2.00
12	0.11	0.30	0.40	0.70	1.05	1.25	1.30	1.70	2.00
13	0.20	0.30	0.40	0.70	1.05	1.25	1.30	1.70	2.00
14	0.23	0.30	0.40	0.70	1.05	1.25	1.30	1.70	2.00
15	0.25	0.30	0.40	0.80	1.05	1.25	1.30	1.70	2.00
16	0.30	0.30	0.60	0.80	1.05	1.25	1.30	1.70	2.00
17	0.30	0.40	0.60	0.80	1.05	1.25	1.30	1.70	2.00
18	0.30	0.40	0.60	0.80	1.05	1.25	1.30	1.70	2.00
19	0.30	0.40	0.60	0.85	1.05	1.25	1.30	1.70	2.00
20	0.30	0.40	0.80	1.00	1.05	1.25	1.30	1.70	2.00
21	0.30	0.60	0.80	1.00	1.05	1.25	1.30	1.70	2.00
22	0.40	0.60	0.80	1.00	1.05	1.25	1.30	1.70	2.00
23	0.40	0.60	0.80	1.00	1.05	1.25	1.30	1.70	2.00
24	0.40	0.60	0.85	1.00	1.05	1.25	1.30	1.70	2.00
25	0.40	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
26	0.60	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
27	0.60	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
28	0.60	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
29	0.60	0.85	1.00	1.00	1.05	1.25	1.30	1.70	2.00
30	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
31	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
32	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
33	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
34	0.85	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
35+	1.00	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00

**Interest Rate:** 5.0%

**EXHIBIT VIII**  
**RiverSource Life Insurance Company**  
**Nationwide Experience Projections with No Increase**  
**Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis**  
**Policy Form: 30160A, Subject to Endorsement Form 32100**

	Calendar Year	Ending Policies Inforce	Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest					Calendar Year	Mid-Year
			Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Effective Int Rate	Disc / Accum Factor
Historical Experience	2000	9,837	3,318,006	0	0	0.0%	0.0%	6,180,744	0	0	0.0%	0.0%	5.00%	1.8628
	2001	25,544	26,856,424	22,638	521,781	0.1%	1.9%	47,645,561	40,162	925,684	0.1%	1.9%	5.00%	1.7741
	2002	39,114	48,223,494	145,719	1,733,934	0.3%	3.6%	81,478,614	246,207	2,929,661	0.3%	3.6%	5.00%	1.6896
	2003	37,807	58,081,691	591,980	1,472,260	1.0%	2.5%	93,461,967	952,583	2,369,083	1.0%	2.5%	5.00%	1.6091
	2004	36,451	55,102,185	1,048,390	4,534,800	1.9%	8.2%	84,445,243	1,606,680	6,949,676	1.9%	8.2%	5.00%	1.5325
	2005	35,453	53,280,360	1,902,407	6,585,885	3.6%	12.4%	77,765,007	2,776,645	9,612,387	3.6%	12.4%	5.00%	1.4595
	2006	34,704	51,930,869	3,112,631	6,028,979	6.0%	11.6%	72,186,063	4,326,686	8,380,531	6.0%	11.6%	5.00%	1.3900
	2007	34,073	50,926,950	4,698,723	11,750,005	9.2%	23.1%	67,419,595	6,220,400	15,555,233	9.2%	23.1%	5.00%	1.3238
	2008	33,150	52,947,252	6,848,733	9,067,876	12.9%	17.1%	66,756,351	8,634,942	11,432,857	12.9%	17.1%	5.00%	1.2608
	2009	32,433	52,314,127	8,907,559	15,602,982	17.0%	29.8%	62,817,241	10,695,931	18,735,594	17.0%	29.8%	5.00%	1.2008
	2010	31,770	51,078,462	12,070,257	13,748,182	23.6%	26.9%	58,412,849	13,803,433	15,722,291	23.6%	26.9%	5.00%	1.1436
	2011	31,155	49,861,552	15,522,996	19,026,800	31.1%	38.2%	54,305,907	16,906,621	20,722,732	31.1%	38.2%	5.00%	1.0891
	2012	30,489	50,194,429	18,870,174	20,918,626	37.6%	41.7%	52,065,194	19,573,473	21,698,271	37.6%	41.7%	5.00%	1.0373
	1/2013-3/2013	30,369	12,912,371	3,909,329	5,332,522	30.3%	41.3%	12,991,361	3,933,244	5,365,143	30.3%	41.3%	5.00%	1.0061
Projected Future Experience	4/2013-12/2013	29,797	38,562,053	16,582,612	17,712,219	43.0%	45.9%	37,862,925	16,281,970	17,391,097	43.0%	45.9%	5.00%	0.9819
	2014	29,034	50,018,292	19,677,241	25,677,381	39.3%	51.3%	47,058,950	18,513,033	24,158,174	39.3%	51.3%	5.00%	0.9408
	2015	28,250	48,390,671	23,647,787	28,129,057	48.9%	58.1%	43,359,645	21,189,201	25,204,567	48.9%	58.1%	5.00%	0.8960
	2016	27,433	46,723,639	27,665,482	30,747,296	59.2%	65.8%	39,872,314	23,608,751	26,238,663	59.2%	65.8%	5.00%	0.8534
	2017	26,579	45,008,117	31,277,994	33,752,786	69.5%	75.0%	36,579,379	25,420,517	27,431,850	69.5%	75.0%	5.00%	0.8127
	2018	25,690	43,245,935	34,254,446	36,941,434	79.2%	85.4%	33,473,527	26,513,871	28,593,672	79.2%	85.4%	5.00%	0.7740
	2019	24,767	41,448,224	37,396,980	40,459,711	90.2%	97.6%	30,554,333	27,567,868	29,825,632	90.2%	97.6%	5.00%	0.7372
	2020	23,809	39,614,822	40,597,256	44,534,472	102.5%	112.4%	27,812,196	28,501,929	31,266,113	102.5%	112.4%	5.00%	0.7021
	2021	22,819	37,744,958	44,215,599	48,943,840	117.1%	129.7%	25,237,552	29,564,041	32,725,503	117.1%	129.7%	5.00%	0.6686
	2022	21,799	35,845,251	48,212,861	53,422,471	134.5%	149.0%	22,826,042	30,701,662	34,019,111	134.5%	149.0%	5.00%	0.6368
	2023	20,750	33,923,914	52,503,015	58,068,035	154.8%	171.2%	20,573,853	31,841,530	35,216,550	154.8%	171.2%	5.00%	0.6065
	2024	19,660	31,974,184	57,043,616	62,733,645	178.4%	196.2%	18,468,000	32,947,877	36,234,386	178.4%	196.2%	5.00%	0.5776
	2025	18,528	29,987,213	61,767,783	67,223,291	206.0%	224.2%	16,495,565	33,977,632	36,978,633	206.0%	224.2%	5.00%	0.5501
	2026	17,368	27,974,817	66,637,058	71,756,388	238.2%	256.5%	14,655,783	34,910,623	37,592,599	238.2%	256.5%	5.00%	0.5239
	2027	16,201	25,968,971	71,596,511	76,138,351	275.7%	293.2%	12,957,083	35,722,706	37,988,833	275.7%	293.2%	5.00%	0.4989
	2028	15,027	23,985,944	76,532,490	80,529,406	319.1%	335.7%	11,397,773	36,367,130	38,266,407	319.1%	335.7%	5.00%	0.4752
	2029	13,849	22,026,301	81,464,837	85,061,230	369.9%	386.2%	9,968,171	36,867,533	38,495,108	369.9%	386.2%	5.00%	0.4526
	2030	12,677	20,095,831	86,368,203	89,176,998	429.8%	443.8%	8,661,449	37,225,323	38,435,934	429.8%	443.8%	5.00%	0.4310
	2031	11,525	18,214,773	91,034,484	92,291,932	499.8%	506.7%	7,476,857	37,368,118	37,884,279	499.8%	506.7%	5.00%	0.4105
	2032	10,399	16,394,492	95,083,310	93,749,692	580.0%	571.8%	6,409,202	37,171,517	36,650,157	580.0%	571.8%	5.00%	0.3909
	2033	9,314	14,648,965	98,180,271	93,860,967	670.2%	640.7%	5,454,107	36,554,506	34,946,342	670.2%	640.7%	5.00%	0.3723
	2034	8,282	12,995,788	100,195,967	93,189,247	771.0%	717.1%	4,608,186	35,528,562	33,044,045	771.0%	717.1%	5.00%	0.3546
	2035	7,307	11,446,088	101,232,599	92,055,510	884.4%	804.3%	3,865,407	34,186,803	31,087,649	884.4%	804.3%	5.00%	0.3377
	2036	6,393	10,001,407	101,369,508	89,898,680	1013.6%	898.9%	3,216,695	32,602,893	28,913,596	1013.6%	898.9%	5.00%	0.3216
	2037	5,548	8,667,074	100,522,983	86,479,683	1159.8%	997.8%	2,654,801	30,791,076	26,489,490	1159.8%	997.8%	5.00%	0.3063
	2038	4,779	7,454,297	98,608,799	82,102,901	1322.8%	1101.4%	2,174,587	28,766,423	23,951,279	1322.8%	1101.4%	5.00%	0.2917
	2039	4,086	6,364,529	95,703,598	77,231,656	1503.7%	1213.5%	1,768,264	26,589,439	21,457,358	1503.7%	1213.5%	5.00%	0.2778
	2040	3,467	5,393,568	91,938,787	71,931,446	1704.6%	1333.7%	1,427,144	24,327,102	19,033,138	1704.6%	1333.7%	5.00%	0.2646
	2041	2,918	4,535,573	87,440,264	66,321,994	1927.9%	1462.3%	1,142,969	22,035,036	16,713,210	1927.9%	1462.3%	5.00%	0.2520
	2042	2,436	3,783,853	82,346,551	60,532,594	2176.3%	1599.8%	908,128	19,763,252	14,527,881	2176.3%	1599.8%	5.00%	0.2400
	2043	2,016	3,131,023	76,801,250	54,688,816	2452.9%	1746.7%	715,665	17,554,643	12,500,351	2452.9%	1746.7%	5.00%	0.2286
	2044	1,654	2,569,192	70,953,187	48,910,757	2761.7%	1903.7%	559,282	15,445,654	10,647,283	2761.7%	1903.7%	5.00%	0.2177
	2045	1,346	2,090,141	64,936,467	43,291,462	3106.8%	2071.2%	433,332	13,462,749	8,975,267	3106.8%	2071.2%	5.00%	0.2073
	2046	1,084	1,685,505	58,873,204	37,922,650	3492.9%	2249.9%	332,802	11,624,479	7,487,804	3492.9%	2249.9%	5.00%	0.1974
2047	866	1,346,967	52,875,850	32,870,641	3925.5%	2440.3%	253,293	9,943,147	6,181,227	3925.5%	2440.3%	5.00%	0.1880	
2048	684	1,066,452	47,042,725	28,186,091	4411.1%	2643.0%	190,993	8,424,995	5,047,915	4411.1%	2643.0%	5.00%	0.1791	
2049	536	836,276	41,458,989	23,904,689	4957.6%	2858.5%	142,639	7,071,420	4,077,284	4957.6%	2858.5%	5.00%	0.1706	
2050	415	649,276	36,189,966	20,040,449	5573.9%	3086.6%	105,470	5,878,774	3,255,413	5573.9%	3086.6%	5.00%	0.1624	
2051	318	498,894	31,284,171	16,599,679	6270.7%	3327.3%	77,182	4,839,873	2,568,083	6270.7%	3327.3%	5.00%	0.1547	
2052	241	379,223	26,775,525	13,579,509	7060.6%	3580.9%	55,875	3,945,100	2,000,802	7060.6%	3580.9%	5.00%	0.1473	
2053	180	285,024	22,684,138	10,964,376	7958.7%	3846.8%	39,996	3,183,120	1,538,561	7958.7%	3846.8%	5.00%	0.1403	
2054	133	211,713	19,018,077	8,735,338	8982.9%	4126.0%	28,294	2,541,605	1,167,404	8982.9%	4126.0%	5.00%	0.1336	
2055	97	155,331	15,774,541	6,863,161	10155.4%	4418.4%	19,770	2,007,746	873,527	10155.4%	4418.4%	5.00%	0.1273	
2056	70	112,503	12,941,101	5,314,990	11502.9%	4724.3%	13,637	1,568,679	644,266	11502.9%	4724.3%	5.00%	0.1212	
2057	50	80,386	10,497,515	4,055,094	13058.8%	5044.5%	9,280	1,211,881	468,139	13058.8%	5044.5%	5.00%	0.1154	
2058	35	56,624	8,417,443	3,046,071	14865.5%	5379.5%	6,226	925,474	334,907	14865.5%	5379.5%	5.00%	0.1099	
2059	24	39,285	6,669,562	2,249,755	16977.4%	5726.7%	4,114	698,381	235,575	16977.4%	5726.7%	5.00%	0.1047	
2060	16	26,814	5,219,954	1,631,555	19467.0%	6084.6%	2,674	520,562	162,707	19467.0%	6084.6%	5.00%	0.0997	
2061	11	17,979	4,033,369	1,159,192	22433.5%	6447.4%	1,708	383,075	110,096	22433.5%	6447.4%	5.00%	0.0950	
2062	7	11,819	3,074,908	804,966	26015.7%	6810.5%	1,069	278,137	72,812	26015.7%	6810.5%	5.00%	0.0905	
Past			617,028,171	77,651,536	116,324,632	12.6%	18							

**EXHIBIT VIII**  
**RiverSource Life Insurance Company**  
**Nationwide Experience Projections with 10% Increase**  
**Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis**  
**Policy Form: 30160A, Subject to Endorsement Form 32100**

	Calendar Year	Ending Policies Inforce	Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest					Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
			Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio		
Historical Experience	2000	9,837	3,318,006	0	0	0.0%	0.0%	6,180,744	0	0	0.0%	0.0%	5.00%	1.8628
	2001	25,544	26,856,424	22,638	521,781	0.1%	1.9%	47,645,561	40,162	925,684	0.1%	1.9%	5.00%	1.7741
	2002	39,114	48,223,494	145,719	1,733,934	0.3%	3.6%	81,478,614	246,207	2,929,661	0.3%	3.6%	5.00%	1.6896
	2003	37,807	58,081,691	591,980	1,472,260	1.0%	2.5%	93,461,967	952,583	2,369,083	1.0%	2.5%	5.00%	1.6091
	2004	36,451	55,102,185	1,048,390	4,534,800	1.9%	8.2%	84,445,243	1,606,680	6,949,676	1.9%	8.2%	5.00%	1.5325
	2005	35,453	53,280,360	1,902,407	6,585,885	3.6%	12.4%	77,765,007	2,776,645	9,612,387	3.6%	12.4%	5.00%	1.4595
	2006	34,704	51,930,869	3,112,631	6,028,979	6.0%	11.6%	72,186,063	4,326,686	8,380,531	6.0%	11.6%	5.00%	1.3900
	2007	34,073	50,926,950	4,698,723	11,750,005	9.2%	23.1%	67,419,595	6,220,400	15,555,233	9.2%	23.1%	5.00%	1.3238
	2008	33,150	52,947,252	6,848,733	9,067,876	12.9%	17.1%	66,756,351	8,634,942	11,432,857	12.9%	17.1%	5.00%	1.2608
	2009	32,433	52,314,127	8,907,559	15,602,982	17.0%	29.8%	62,817,241	10,695,931	18,735,594	17.0%	29.8%	5.00%	1.2008
	2010	31,770	51,078,462	12,070,257	13,748,182	23.6%	26.9%	58,412,849	13,803,433	15,722,291	23.6%	26.9%	5.00%	1.1436
	2011	31,155	49,861,552	15,522,996	19,026,800	31.1%	38.2%	54,305,907	16,906,621	20,722,732	31.1%	38.2%	5.00%	1.0891
	2012	30,489	50,194,429	18,870,174	20,918,626	37.6%	41.7%	52,065,194	19,573,473	21,698,271	37.6%	41.7%	5.00%	1.0373
1/2013-3/2013	30,369	12,912,371	3,909,329	5,332,522	30.3%	41.3%	12,991,361	3,933,244	5,365,143	30.3%	41.3%	5.00%	1.0061	
Projected Future Experience	4/2013-12/2013	29,797	38,562,053	16,582,612	17,712,219	43.0%	45.9%	37,862,925	16,281,970	17,391,097	43.0%	45.9%	5.00%	0.9819
	2014	29,034	52,486,729	19,681,983	25,735,749	37.5%	49.0%	49,381,342	18,517,495	24,213,089	37.5%	49.0%	5.00%	0.9408
	2015	28,250	53,229,738	23,679,305	28,236,802	44.5%	53.0%	47,695,609	21,217,442	25,301,110	44.5%	53.0%	5.00%	0.8960
	2016	27,433	51,396,003	27,726,206	30,856,949	53.9%	60.0%	43,859,545	23,660,571	26,332,238	53.9%	60.0%	5.00%	0.8534
	2017	26,579	49,508,929	31,361,044	33,864,539	63.3%	68.4%	40,237,317	25,488,014	27,522,676	63.3%	68.4%	5.00%	0.8127
	2018	25,690	47,570,528	34,354,035	37,054,966	72.2%	77.9%	36,820,879	26,590,955	28,681,549	72.2%	77.9%	5.00%	0.7740
	2019	24,767	45,593,047	37,506,451	40,575,112	82.3%	89.0%	33,609,766	27,648,582	29,910,702	82.3%	89.0%	5.00%	0.7372
	2020	23,809	43,576,304	40,713,770	44,652,053	93.4%	102.5%	30,593,416	28,583,730	31,348,662	93.4%	102.5%	5.00%	0.7021
	2021	22,819	41,519,454	44,336,813	49,063,511	106.8%	118.2%	27,761,307	29,645,089	32,805,519	106.8%	118.2%	5.00%	0.6686
	2022	21,799	39,429,776	48,337,929	53,543,713	122.6%	135.8%	25,108,646	30,781,305	34,096,317	122.6%	135.8%	5.00%	0.6368
	2023	20,750	37,316,306	52,631,334	58,190,560	141.0%	155.9%	22,631,239	31,919,352	35,290,858	141.0%	155.9%	5.00%	0.6065
	2024	19,660	35,171,603	57,174,615	62,856,903	162.6%	178.7%	20,314,800	33,023,541	36,305,579	162.6%	178.7%	5.00%	0.5776
	2025	18,528	32,985,934	61,900,789	67,346,486	187.7%	204.2%	18,145,121	34,500,796	37,046,401	187.7%	204.2%	5.00%	0.5501
	2026	17,368	30,772,298	66,771,323	71,879,096	217.0%	233.6%	16,121,362	34,980,964	37,656,885	217.0%	233.6%	5.00%	0.5239
	2027	16,201	28,565,869	71,731,334	76,259,961	251.1%	267.0%	14,252,791	35,789,975	38,049,510	251.1%	267.0%	5.00%	0.4989
	2028	15,027	26,384,538	76,667,262	80,649,629	290.6%	305.7%	12,537,550	36,431,172	38,323,535	290.6%	305.7%	5.00%	0.4752
	2029	13,849	24,228,931	81,599,086	85,180,045	336.8%	351.6%	10,964,988	36,928,289	38,548,879	336.8%	351.6%	5.00%	0.4526
	2030	12,677	22,105,414	86,501,550	89,293,951	391.3%	403.9%	9,527,594	37,282,796	38,486,342	391.3%	403.9%	5.00%	0.4310
	2031	11,525	20,036,250	91,166,431	92,405,851	455.0%	461.2%	8,224,542	37,422,280	37,931,041	455.0%	461.2%	5.00%	0.4105
	2032	10,399	18,033,941	95,213,010	93,858,699	528.0%	520.5%	7,050,122	37,222,221	36,692,772	528.0%	520.5%	5.00%	0.3909
	2033	9,314	16,113,861	98,306,578	93,963,776	610.1%	583.1%	5,999,517	36,601,533	34,984,620	610.1%	583.1%	5.00%	0.3723
	2034	8,282	14,295,367	100,317,717	93,285,411	701.7%	652.6%	5,069,005	35,571,734	33,078,143	701.7%	652.6%	5.00%	0.3546
	2035	7,307	12,590,697	101,348,886	92,145,065	805.0%	731.9%	4,251,947	34,226,073	31,117,892	805.0%	731.9%	5.00%	0.3377
	2036	6,393	11,001,547	101,479,666	89,981,186	922.4%	817.9%	3,538,365	32,638,322	28,940,132	922.4%	817.9%	5.00%	0.3216
	2037	5,548	9,533,781	100,626,411	86,554,600	1055.5%	907.9%	2,920,281	30,822,757	26,512,437	1055.5%	907.9%	5.00%	0.3063
	2038	4,779	8,199,727	98,704,952	82,170,063	1203.8%	1002.1%	2,392,046	28,794,474	23,970,871	1203.8%	1002.1%	5.00%	0.2917
	2039	4,086	7,000,982	95,792,099	77,291,317	1368.3%	1104.0%	1,945,091	26,614,027	21,473,934	1368.3%	1104.0%	5.00%	0.2778
	2040	3,467	5,932,924	92,019,458	71,983,933	1551.0%	1213.3%	1,569,858	24,348,447	19,047,026	1551.0%	1213.3%	5.00%	0.2646
	2041	2,918	4,989,131	87,513,093	66,367,713	1754.1%	1330.2%	1,257,266	22,053,389	16,724,732	1754.1%	1330.2%	5.00%	0.2520
	2042	2,436	4,162,238	82,411,679	60,572,025	1980.0%	1455.3%	998,941	19,778,883	14,537,345	1980.0%	1455.3%	5.00%	0.2400
	2043	2,016	3,444,125	76,858,944	54,722,484	2231.6%	1588.9%	787,232	17,567,830	12,508,047	2231.6%	1588.9%	5.00%	0.2286
	2044	1,654	2,826,111	71,003,829	48,939,218	2512.4%	1731.7%	615,210	15,456,679	10,653,478	2512.4%	1731.7%	5.00%	0.2177
	2045	1,346	2,299,158	64,980,514	43,315,278	2826.3%	1884.0%	476,665	13,471,881	8,980,204	2826.3%	1884.0%	5.00%	0.2073
	2046	1,084	1,854,055	58,911,167	37,942,378	3177.4%	2046.5%	366,082	11,631,974	7,491,699	3177.4%	2046.5%	5.00%	0.1974
2047	866	1,481,664	52,908,271	32,886,815	3570.9%	2219.6%	278,623	9,949,244	6,184,268	3570.9%	2219.6%	5.00%	0.1880	
2048	684	1,173,097	47,070,162	28,199,213	4012.5%	2403.8%	210,093	8,429,909	5,050,265	4012.5%	2403.8%	5.00%	0.1791	
2049	536	919,903	41,481,997	23,915,222	4509.4%	2599.8%	156,903	7,075,344	4,079,081	4509.4%	2599.8%	5.00%	0.1706	
2050	415	714,204	36,209,084	20,048,809	5069.9%	2807.2%	116,017	5,881,880	3,256,771	5069.9%	2807.2%	5.00%	0.1624	
2051	318	548,784	31,299,909	16,606,238	5703.5%	3026.0%	84,901	4,842,308	2,569,097	5703.5%	3026.0%	5.00%	0.1547	
2052	241	417,146	26,788,359	13,584,593	6421.8%	3256.6%	61,462	3,946,991	2,001,551	6421.8%	3256.6%	5.00%	0.1473	
2053	180	313,527	22,694,503	10,968,268	7238.5%	3498.4%	43,995	3,184,574	1,539,107	7238.5%	3498.4%	5.00%	0.1403	
2054	133	232,884	19,026,366	8,738,278	8169.9%	3752.2%	31,123	2,542,712	1,167,797	8169.9%	3752.2%	5.00%	0.1336	
2055	97	170,864	15,781,102	6,865,353	9236.0%	4018.0%	21,747	2,008,581	873,806	9236.0%	4018.0%	5.00%	0.1273	
2056	70	123,753	12,946,242	5,316,601	10461.4%	4296.1%	15,001	1,569,302	644,461	10461.4%	4296.1%	5.00%	0.1212	
2057	50	88,425	10,501,500	4,056,262	11876.2%	4587.2%	10,208	1,212,341	468,273	11876.2%	4587.2%	5.00%	0.1154	
2058	35	62,286	8,420,498	3,046,905	13519.0%	4891.8%	6,848	925,810	334,999	13519.0%	4891.8%	5.00%	0.1099	
2059	24	43,214	6,671,879	2,250,340	15439.3%	5207.5%	4,525	698,623	235,637	15439.3%	5207.5%	5.00%	0.1047	
2060	16	29,496	5,221,691	1,631,959	17703.2%	5532.9%	2,941	520,735	162,748	17703.2%	5532.9%	5.00%	0.0997	
2061	11	19,777	4,034,655	1,159,466	20400.6%	5862.7%	1,878	383,198	110,122	20400.6%	5862.7%	5.00%	0.0950	
2062	7	13,001	3,075,849	805,147	23657.9%	6192.8%	1,176	278,222	72,829	23657.9%	6192.8%	5.00%	0.0905	
Past			617,028,171	77,651,536	116,324,632	12.6%	18.9%	837,931,697	89,717,006	140,399,143	10.7%	16.8%		
Future			849,069,370	2,640,043,946	2,318,530,709	310.9%	273.1%	545,935,809	1,006,494,317	970,706,134	184.4%	177.8%		
Lifetime			1,466,097,542	2,717,695,482	2,434,855,340	185.4%	166.1%	1,383,867,506	1,096,211,323	1,111,105,276	79.2%	80.3%		

**EXHIBIT IX**  
**RiverSource Life Insurance Company**  
**Virginia Experience Projections with No Increase**  
**Policy Form: 30160A-VA, Subject to Endorsement Form 32100**

	Calendar Year	Ending Policies Inforce	Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest					Calendar Year	Mid-Year
			Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Effective Int Rate	Disc / Accum Factor
Historical Experience	2000	510	155,746	0	0	0.0%	0.0%	290,122	0	0	0.0%	0.0%	5.00%	1.8628
	2001	1,213	1,237,228	0	0	0.0%	0.0%	2,194,947	0	0	0.0%	0.0%	5.00%	1.7741
	2002	1,908	2,248,858	1,125	193,326	0.1%	8.6%	3,799,680	1,900	326,644	0.1%	8.6%	5.00%	1.6896
	2003	1,881	2,805,151	48,854	0	1.7%	0.0%	4,513,900	78,614	0	1.7%	0.0%	5.00%	1.6091
	2004	1,839	2,693,828	98,428	334,456	3.7%	12.4%	4,128,347	150,844	512,561	3.7%	12.4%	5.00%	1.5325
	2005	1,810	2,640,938	148,578	791,847	5.6%	30.0%	3,854,565	216,856	1,155,735	5.6%	30.0%	5.00%	1.4595
	2006	1,793	2,599,868	161,913	18,125	6.2%	0.7%	3,613,924	225,066	25,194	6.2%	0.7%	5.00%	1.3900
	2007	1,762	2,583,845	316,816	508,120	12.3%	19.7%	3,420,620	419,417	672,674	12.3%	19.7%	5.00%	1.3238
	2008	1,731	2,684,905	367,590	400,756	13.7%	14.9%	3,385,151	463,460	505,276	13.7%	14.9%	5.00%	1.2608
	2009	1,709	2,686,483	511,612	631,038	19.0%	23.5%	3,225,848	614,328	757,732	19.0%	23.5%	5.00%	1.2008
	2010	1,690	2,644,682	602,590	99,584	22.8%	3.8%	3,024,433	689,116	113,883	22.8%	3.8%	5.00%	1.1436
	2011	1,671	2,609,891	554,233	327,450	21.2%	12.5%	2,842,521	603,634	356,637	21.2%	12.5%	5.00%	1.0891
	2012	1,654	2,652,307	396,403	693,921	14.9%	26.2%	2,751,159	411,177	719,783	14.9%	26.2%	5.00%	1.0373
	1/2013-3/2013	1,647	685,444	81,316	273,905	11.9%	40.0%	689,637	81,814	275,581	11.9%	40.0%	5.00%	1.0061
Projected Future Experience	4/2013-12/2013	1,620	2,068,005	964,048	771,564	46.6%	37.3%	2,030,512	946,570	757,575	46.6%	37.3%	5.00%	0.9819
	2014	1,584	2,695,435	776,369	1,137,512	28.8%	42.2%	2,535,959	730,435	1,070,211	28.8%	42.2%	5.00%	0.9408
	2015	1,546	2,623,076	952,314	1,272,142	36.3%	48.5%	2,350,363	853,305	1,139,882	36.3%	48.5%	5.00%	0.8960
	2016	1,507	2,548,163	1,163,205	1,413,690	45.6%	55.5%	2,174,513	992,638	1,206,394	45.6%	55.5%	5.00%	0.8534
	2017	1,465	2,470,063	1,358,605	1,582,539	55.0%	64.1%	2,007,491	1,104,177	1,286,174	55.0%	64.1%	5.00%	0.8127
	2018	1,422	2,388,659	1,533,825	1,768,125	64.2%	74.0%	1,848,887	1,187,222	1,368,576	64.2%	74.0%	5.00%	0.7740
	2019	1,376	2,304,314	1,719,787	1,975,335	74.6%	85.7%	1,698,668	1,267,773	1,456,155	74.6%	85.7%	5.00%	0.7372
	2020	1,328	2,216,844	1,910,395	2,218,384	86.2%	100.1%	1,556,370	1,341,222	1,557,451	86.2%	100.1%	5.00%	0.7021
	2021	1,278	2,126,260	2,129,388	2,488,726	100.1%	117.0%	1,421,689	1,423,781	1,664,046	100.1%	117.0%	5.00%	0.6686
	2022	1,227	2,032,808	2,374,823	2,767,883	116.8%	136.2%	1,294,480	1,512,273	1,762,571	116.8%	136.2%	5.00%	0.6368
	2023	1,173	1,936,680	2,640,652	3,054,317	136.3%	157.7%	1,174,539	1,601,478	1,852,353	136.3%	157.7%	5.00%	0.6065
	2024	1,116	1,837,303	2,926,371	3,352,374	159.3%	182.5%	1,061,209	1,690,246	1,936,301	159.3%	182.5%	5.00%	0.5776
	2025	1,056	1,734,167	3,224,963	3,644,267	186.0%	210.1%	953,942	1,774,009	2,004,662	186.0%	210.1%	5.00%	0.5501
	2026	994	1,627,900	3,532,956	3,945,946	217.0%	242.4%	852,844	1,850,888	2,067,250	217.0%	242.4%	5.00%	0.5239
	2027	932	1,520,333	3,853,089	4,239,482	253.4%	278.9%	758,562	1,922,479	2,115,268	253.4%	278.9%	5.00%	0.4989
	2028	868	1,412,458	4,177,585	4,542,292	295.8%	321.6%	671,179	1,985,128	2,158,431	295.8%	321.6%	5.00%	0.4752
	2029	803	1,304,367	4,507,608	4,850,308	345.6%	371.9%	590,301	2,039,952	2,195,044	345.6%	371.9%	5.00%	0.4526
	2030	738	1,196,572	4,839,243	5,141,962	404.4%	429.7%	515,731	2,085,749	2,216,223	404.4%	429.7%	5.00%	0.4310
	2031	674	1,090,289	5,163,967	5,383,171	473.6%	493.7%	447,545	2,119,721	2,209,701	473.6%	493.7%	5.00%	0.4105
	2032	610	986,216	5,457,981	5,521,242	553.4%	559.8%	385,548	2,133,723	2,158,454	553.4%	559.8%	5.00%	0.3909
	2033	548	885,327	5,697,360	5,570,632	643.5%	629.2%	329,625	2,121,243	2,074,059	643.5%	629.2%	5.00%	0.3723
	2034	489	788,793	5,873,448	5,578,605	744.6%	707.2%	279,699	2,082,670	1,978,122	744.6%	707.2%	5.00%	0.3546
	2035	433	697,405	5,991,722	5,554,313	859.1%	796.4%	235,517	2,023,437	1,875,722	859.1%	796.4%	5.00%	0.3377
	2036	380	611,474	6,053,396	5,459,249	990.0%	892.8%	196,665	1,946,919	1,755,827	990.0%	892.8%	5.00%	0.3216
	2037	330	531,438	6,051,365	5,279,690	1138.7%	993.5%	162,784	1,853,586	1,617,215	1138.7%	993.5%	5.00%	0.3063
	2038	285	458,156	5,978,756	5,036,036	1305.0%	1099.2%	133,655	1,744,139	1,469,126	1305.0%	1099.2%	5.00%	0.2917
	2039	244	391,861	5,839,743	4,755,380	1490.3%	1213.5%	108,871	1,622,462	1,321,192	1490.3%	1213.5%	5.00%	0.2778
	2040	207	332,419	5,641,616	4,441,974	1697.1%	1336.3%	87,958	1,492,778	1,175,351	1697.1%	1336.3%	5.00%	0.2646
	2041	174	279,593	5,391,225	4,101,025	1928.2%	1466.8%	70,458	1,358,594	1,033,463	1928.2%	1466.8%	5.00%	0.2520
	2042	145	233,082	5,096,233	3,742,093	2186.5%	1605.5%	55,940	1,223,101	898,106	2186.5%	1605.5%	5.00%	0.2400
	2043	120	192,529	4,765,142	3,373,406	2475.0%	1752.2%	44,007	1,089,180	771,067	2475.0%	1752.2%	5.00%	0.2286
	2044	98	157,527	4,408,072	3,005,686	2798.3%	1908.0%	34,292	959,584	654,302	2798.3%	1908.0%	5.00%	0.2177
	2045	79	127,633	4,034,244	2,645,410	3160.8%	2072.7%	26,461	836,387	548,451	3160.8%	2072.7%	5.00%	0.2073
	2046	63	102,376	3,652,165	2,299,083	3567.4%	2245.7%	20,214	721,118	453,953	3567.4%	2245.7%	5.00%	0.1974
2047	50	81,271	3,270,221	1,972,263	4023.8%	2426.8%	15,283	614,955	370,878	4023.8%	2426.8%	5.00%	0.1880	
2048	39	63,835	2,895,776	1,670,206	4536.3%	2616.4%	11,432	518,611	299,121	4536.3%	2616.4%	5.00%	0.1791	
2049	30	49,593	2,535,772	1,395,889	5113.1%	2814.7%	8,459	432,512	238,089	5113.1%	2814.7%	5.00%	0.1706	
2050	23	38,096	2,195,581	1,150,784	5763.3%	3020.8%	6,188	356,655	186,936	5763.3%	3020.8%	5.00%	0.1624	
2051	18	28,923	1,879,331	935,499	6497.6%	3234.4%	4,475	290,745	144,728	6497.6%	3234.4%	5.00%	0.1547	
2052	13	21,694	1,589,986	749,264	7329.3%	3453.8%	3,196	234,268	110,396	7329.3%	3453.8%	5.00%	0.1473	
2053	10	16,067	1,329,254	591,159	8273.4%	3679.4%	2,255	186,526	82,954	8273.4%	3679.4%	5.00%	0.1403	
2054	7	11,744	1,097,960	459,377	9349.3%	3911.7%	1,569	146,733	61,392	9349.3%	3911.7%	5.00%	0.1336	
2055	5	8,467	895,895	351,417	10580.4%	4150.2%	1,078	114,027	44,728	10580.4%	4150.2%	5.00%	0.1273	
2056	4	6,019	722,005	264,408	11994.7%	4392.6%	730	87,519	32,051	11994.7%	4392.6%	5.00%	0.1212	
2057	2	4,217	574,563	195,677	13626.3%	4640.7%	487	66,330	22,590	13626.3%	4640.7%	5.00%	0.1154	
2058	2	2,909	451,419	142,261	15517.6%	4890.3%	320	49,632	15,641	15517.6%	4890.3%	5.00%	0.1099	
2059	1	1,976	350,054	101,546	17719.5%	5140.2%	207	36,655	10,633	17719.5%	5140.2%	5.00%	0.1047	
2060	1	1,320	267,849	71,071	20297.7%	5385.8%	132	26,711	7,088	20297.7%	5385.8%	5.00%	0.0997	
2061	0	866	202,171	48,764	23339.6%	5629.6%	82	19,201	4,631	23339.6%	5629.6%	5.00%	0.0950	
2062	0	558	150,484	32,755	26967.4%	5869.9%	50	13,612	2,963	26967.4%	5869.9%	5.00%	0.0905	
Past			30,929,174	3,289,458	4,272,528	10.6%	13.8%	41,734,856	3,956,226	5,421,701	9.5%	13.0%		
Future			44,247,077	150,089,983	132,046,182	339.2%	298.4%	28,172,420	54,832,660	53,443,496	194.6%	189.7%		
Lifetime			75,176,251	153,379,441	136,318,710	204.0%	181.3%	69,907,276	58,788,886	58,865,197	84.1%	84.2%		

**EXHIBIT IX**  
**RiverSource Life Insurance Company**  
**Virginia Experience Projections with 10% Increase**  
**Policy Form: 30160A-VA, Subject to Endorsement Form 32100**

	Calendar Year	Ending Policies Inforce	Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest					Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
			Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio		
Historical Experience	2000	510	155,746	0	0	0.0%	0.0%	290,122	0	0	0.0%	0.0%	5.00%	1.8628
	2001	1,213	1,237,228	0	0	0.0%	0.0%	2,194,947	0	0	0.0%	0.0%	5.00%	1.7741
	2002	1,908	2,248,858	1,125	193,326	0.1%	8.6%	3,799,680	1,900	326,644	0.1%	8.6%	5.00%	1.6896
	2003	1,881	2,805,151	48,854	0	1.7%	0.0%	4,513,900	78,614	0	1.7%	0.0%	5.00%	1.6091
	2004	1,839	2,693,828	98,428	334,456	3.7%	12.4%	4,128,347	150,844	512,561	3.7%	12.4%	5.00%	1.5325
	2005	1,810	2,640,938	148,578	791,847	5.6%	30.0%	3,854,565	216,856	1,155,735	5.6%	30.0%	5.00%	1.4595
	2006	1,793	2,599,868	161,913	18,125	6.2%	0.7%	3,613,924	225,066	25,194	6.2%	0.7%	5.00%	1.3900
	2007	1,762	2,583,845	316,816	508,120	12.3%	19.7%	3,420,620	419,417	672,674	12.3%	19.7%	5.00%	1.3238
	2008	1,731	2,684,905	367,590	400,756	13.7%	14.9%	3,385,151	463,460	505,276	13.7%	14.9%	5.00%	1.2608
	2009	1,709	2,686,483	511,612	631,038	19.0%	23.5%	3,225,848	614,328	757,732	19.0%	23.5%	5.00%	1.2008
	2010	1,690	2,644,682	602,590	99,584	22.8%	3.8%	3,024,433	689,116	113,883	22.8%	3.8%	5.00%	1.1436
	2011	1,671	2,609,891	554,233	327,450	21.2%	12.5%	2,842,521	603,634	356,637	21.2%	12.5%	5.00%	1.0891
	2012	1,654	2,652,307	396,403	693,921	14.9%	26.2%	2,751,159	411,177	719,783	14.9%	26.2%	5.00%	1.0373
1/2013-3/2013	1,647	685,444	81,316	273,905	11.9%	40.0%	689,637	81,814	275,581	11.9%	40.0%	5.00%	1.0061	
Projected Future Experience	4/2013-12/2013	1,620	2,068,005	964,048	771,564	46.6%	37.3%	2,030,512	946,570	757,575	46.6%	37.3%	5.00%	0.9819
	2014	1,584	2,829,600	776,578	1,139,965	27.4%	40.3%	2,662,186	730,631	1,072,518	27.4%	40.3%	5.00%	0.9408
	2015	1,546	2,885,384	953,605	1,276,521	33.0%	44.2%	2,585,399	854,461	1,143,806	33.0%	44.2%	5.00%	0.8960
	2016	1,507	2,802,979	1,165,666	1,418,251	41.6%	50.6%	2,391,964	994,738	1,210,286	41.6%	50.6%	5.00%	0.8534
	2017	1,465	2,717,070	1,362,004	1,587,317	50.1%	58.4%	2,208,240	1,106,940	1,290,058	50.1%	58.4%	5.00%	0.8127
	2018	1,422	2,627,525	1,537,973	1,773,122	58.5%	67.5%	2,033,775	1,190,433	1,372,445	58.5%	67.5%	5.00%	0.7740
	2019	1,376	2,534,746	1,724,466	1,980,560	68.0%	78.1%	1,868,535	1,271,223	1,460,007	68.0%	78.1%	5.00%	0.7372
	2020	1,328	2,438,529	1,915,502	2,223,862	78.6%	91.2%	1,712,007	1,344,808	1,561,297	78.6%	91.2%	5.00%	0.7021
	2021	1,278	2,338,886	2,134,837	2,494,467	91.3%	106.7%	1,563,858	1,427,424	1,667,885	91.3%	106.7%	5.00%	0.6686
	2022	1,227	2,236,089	2,380,593	2,773,863	106.5%	124.0%	1,423,928	1,515,948	1,766,379	106.5%	124.0%	5.00%	0.6368
	2023	1,173	2,130,348	2,646,728	3,060,507	124.2%	143.7%	1,291,993	1,605,162	1,856,108	124.2%	143.7%	5.00%	0.6065
	2024	1,116	2,021,033	2,932,733	3,358,750	145.1%	166.2%	1,167,330	1,693,920	1,939,983	145.1%	166.2%	5.00%	0.5776
	2025	1,056	1,907,584	3,231,583	3,650,778	169.4%	191.4%	1,049,336	1,777,650	2,008,244	169.4%	191.4%	5.00%	0.5501
	2026	994	1,790,690	3,539,797	3,952,565	197.7%	220.7%	938,128	1,854,472	2,070,717	197.7%	220.7%	5.00%	0.5239
	2027	932	1,672,366	3,860,113	4,246,163	230.8%	253.9%	834,418	1,925,983	2,118,601	230.8%	253.9%	5.00%	0.4989
	2028	868	1,553,703	4,184,756	4,549,020	269.3%	292.8%	738,297	1,988,536	2,161,628	269.3%	292.8%	5.00%	0.4752
	2029	803	1,434,803	4,514,895	4,857,063	314.7%	338.5%	649,331	2,043,250	2,198,101	314.7%	338.5%	5.00%	0.4526
	2030	738	1,316,230	4,846,617	5,148,713	368.2%	391.2%	567,305	2,088,927	2,219,133	368.2%	391.2%	5.00%	0.4310
	2031	674	1,199,318	5,171,392	5,389,845	431.2%	449.4%	492,300	2,122,769	2,212,441	431.2%	449.4%	5.00%	0.4105
	2032	610	1,084,838	5,465,399	5,527,712	503.8%	509.5%	424,103	2,136,623	2,160,983	503.8%	509.5%	5.00%	0.3909
	2033	548	973,860	5,704,692	5,576,798	585.8%	572.6%	362,588	2,123,973	2,076,355	585.8%	572.6%	5.00%	0.3723
	2034	489	867,673	5,880,611	5,584,436	677.7%	643.6%	307,669	2,085,210	1,980,189	677.7%	643.6%	5.00%	0.3546
	2035	433	767,146	5,998,650	5,559,797	781.9%	724.7%	259,069	2,025,777	1,877,574	781.9%	724.7%	5.00%	0.3377
	2036	380	672,621	6,060,035	5,464,347	901.0%	812.4%	216,331	1,949,054	1,757,466	901.0%	812.4%	5.00%	0.3216
	2037	330	584,582	6,057,664	5,284,354	1036.2%	904.0%	179,063	1,855,516	1,618,644	1036.2%	904.0%	5.00%	0.3063
	2038	285	503,972	5,984,668	5,040,246	1187.5%	1000.1%	147,020	1,745,863	1,470,354	1187.5%	1000.1%	5.00%	0.2917
	2039	244	431,047	5,845,230	4,759,142	1356.1%	1104.1%	119,758	1,623,987	1,322,238	1356.1%	1104.1%	5.00%	0.2778
	2040	207	365,660	5,646,657	4,445,302	1544.2%	1215.7%	96,754	1,494,111	1,176,232	1544.2%	1215.7%	5.00%	0.2646
	2041	174	307,552	5,395,807	4,103,936	1754.4%	1334.4%	77,503	1,359,749	1,034,196	1754.4%	1334.4%	5.00%	0.2520
	2042	145	256,390	5,100,355	3,744,610	1989.3%	1460.5%	61,534	1,224,090	898,710	1989.3%	1460.5%	5.00%	0.2400
	2043	120	211,782	4,768,812	3,375,558	2251.8%	1593.9%	48,407	1,090,019	771,559	2251.8%	1593.9%	5.00%	0.2286
	2044	98	173,280	4,411,306	3,007,504	2545.8%	1735.6%	37,721	960,288	654,697	2545.8%	1735.6%	5.00%	0.2177
	2045	79	140,396	4,037,064	2,646,928	2875.5%	1885.3%	29,107	836,972	548,766	2875.5%	1885.3%	5.00%	0.2073
	2046	63	112,613	3,654,600	2,300,336	3245.3%	2042.7%	22,235	721,599	454,200	3245.3%	2042.7%	5.00%	0.1974
2047	50	89,399	3,272,301	1,973,283	3660.3%	2207.3%	16,811	615,346	371,070	3660.3%	2207.3%	5.00%	0.1880	
2048	39	70,219	2,897,534	1,671,028	4126.5%	2379.8%	12,576	518,926	299,268	4126.5%	2379.8%	5.00%	0.1791	
2049	30	54,553	2,537,243	1,396,543	4651.0%	2560.0%	9,305	432,763	238,200	4651.0%	2560.0%	5.00%	0.1706	
2050	23	41,906	2,196,799	1,151,297	5242.3%	2747.4%	6,807	356,853	187,019	5242.3%	2747.4%	5.00%	0.1624	
2051	18	31,816	1,880,328	935,897	5910.1%	2941.6%	4,922	290,899	144,790	5910.1%	2941.6%	5.00%	0.1547	
2052	13	23,863	1,590,794	749,568	6666.4%	3141.1%	3,516	234,387	110,441	6666.4%	3141.1%	5.00%	0.1473	
2053	10	17,673	1,329,902	591,387	7524.9%	3346.2%	2,480	186,617	82,986	7524.9%	3346.2%	5.00%	0.1403	
2054	7	12,918	1,098,473	459,546	8503.4%	3557.4%	1,726	146,802	61,414	8503.4%	3557.4%	5.00%	0.1336	
2055	5	9,314	896,297	351,541	9622.9%	3774.2%	1,185	114,079	44,743	9622.9%	3774.2%	5.00%	0.1273	
2056	4	6,621	722,316	264,497	10909.0%	3994.7%	803	87,557	32,062	10909.0%	3994.7%	5.00%	0.1212	
2057	2	4,638	574,802	195,740	12392.7%	4220.2%	535	66,358	22,597	12392.7%	4220.2%	5.00%	0.1154	
2058	2	3,200	451,600	142,306	14112.6%	4447.1%	352	49,652	15,646	14112.6%	4447.1%	5.00%	0.1099	
2059	1	2,173	350,189	101,576	16114.9%	4674.3%	228	36,669	10,636	16114.9%	4674.3%	5.00%	0.1047	
2060	1	1,452	267,949	71,091	18459.3%	4897.6%	145	26,721	7,090	18459.3%	4897.6%	5.00%	0.0997	
2061	0	953	202,244	48,778	21225.5%	5119.3%	90	19,208	4,633	21225.5%	5119.3%	5.00%	0.0950	
2062	0	614	150,536	32,764	24524.3%	5337.7%	56	13,617	2,964	24524.3%	5337.7%	5.00%	0.0905	
Past			30,929,174	3,289,458	4,272,528	10.6%	13.8%	41,734,856	3,956,226	5,421,701	9.5%	13.0%		
Future			48,329,606	150,274,743	132,210,745	310.9%	273.6%	30,659,243	54,913,129	53,524,935	179.1%	174.6%		
Lifetime			79,258,780	153,564,201	136,483,272	193.8%	172.2%	72,394,098	58,869,355	58,946,635	81.3%	81.4%		

**EXHIBIT X**  
**RiverSource Life Insurance Company**  
**Incurred Loss Ratio Including the Change in Active Life Reserves**  
**Nationwide Experience, without Interest**  
**Policy Form: 30160A, Subject to Endorsement Form 32100**

Calendar Year	(a) Earned Premiums <sup>1</sup>	(b) Incurred Claims	(c) Change in Active Life Reserves	(d) = (b+c)/(a) Loss Ratio
2000	3,318,006	0	5,107,758	153.9%
2001	26,856,424	521,781	8,405,957	33.2%
2002	48,223,494	1,733,934	30,347,643	66.5%
2003	58,081,691	1,472,260	46,913,547	83.3%
2004	55,102,185	4,534,800	57,452,858	112.5%
2005	53,280,360	6,585,885	56,283,231	118.0%
2006	51,930,869	6,028,979	55,810,732	119.1%
2007	50,926,950	11,750,005	66,244,850	153.2%
2008	52,947,252	9,067,876	54,059,116	119.2%
2009	52,314,127	15,602,982	55,652,769	136.2%
2010	51,078,462	13,748,182	56,832,582	138.2%
2011	49,861,552	19,026,800	(38,302,524)	-38.7%
2012	50,194,429	20,918,626	45,838,077	133.0%
1/2013-3/2013	12,912,371	5,332,522	8,456,395	106.8%
Total	617,028,171	116,324,632	509,102,992	101.4%

<sup>1</sup> Premiums reflect the accumulated 21% rate increases as approved in Virginia and implemented from 2007 through 2013 on a nationwide basis.

**EXHIBIT XI**  
**RiverSource Life Insurance Company**  
**Incurred Loss Ratio Including the Change in Active Life Reserves**  
**Virginia Experience, without Interest**  
**Policy Form: 30160A-VA, Subject to Endorsement Form 32100**

Calendar Year	(a) Earned Premiums	(b) Incurred Claims	(c) Change in Active Life Reserves	(d) = (b+c)/(a) Loss Ratio
2000	155,746	0	162,825	104.5%
2001	1,237,228	0	353,274	28.6%
2002	2,248,858	193,326	1,448,086	73.0%
2003	2,805,151	0	2,282,154	81.4%
2004	2,693,828	334,456	2,866,018	118.8%
2005	2,640,938	791,847	2,812,734	136.5%
2006	2,599,868	18,125	2,799,131	108.4%
2007	2,583,845	508,120	4,307,227	186.4%
2008	2,684,905	400,756	3,045,700	128.4%
2009	2,686,483	631,038	3,229,438	143.7%
2010	2,644,682	99,584	3,359,320	130.8%
2011	2,609,891	327,450	(1,992,178)	-63.8%
2012	2,652,307	693,921	2,787,698	131.3%
1/2013-3/2013	685,444	273,905	469,059	108.4%
Total	30,929,174	4,272,528	27,930,486	104.1%

EXHIBIT XII

RiverSource Life Insurance Company  
Current Annual Premiums

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

LIFETIME BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible						Deductible						Deductible					
	20 days			90 days			20 days			90 days			20 days			90 days		
	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage
40	67.76	77.44	87.12	55.66	64.14	72.60	107.70	122.82	137.94	99.22	112.54	125.84	145.20	163.36	181.50	130.68	146.42	162.14
41	67.76	77.44	87.12	55.66	64.14	72.60	107.70	122.82	137.94	99.22	112.54	125.84	145.20	163.36	181.50	130.68	146.42	162.14
42	67.76	77.44	87.12	55.66	64.14	72.60	107.70	122.82	137.94	99.22	112.54	125.84	145.20	163.36	181.50	130.68	146.42	162.14
43	67.76	77.44	87.12	55.66	64.14	72.60	107.70	122.82	137.94	99.22	112.54	125.84	145.20	163.36	181.50	130.68	146.42	162.14
44	67.76	77.44	87.12	55.66	64.14	72.60	107.70	122.82	137.94	99.22	112.54	125.84	145.20	163.36	181.50	130.68	146.42	162.14
45	67.76	77.44	87.12	55.66	64.14	72.60	107.70	122.82	137.94	99.22	112.54	125.84	145.20	163.36	181.50	130.68	146.42	162.14
46	67.76	77.44	87.12	55.66	64.14	72.60	110.12	125.24	140.36	99.22	112.54	125.84	150.04	168.20	186.34	135.52	151.26	166.98
47	68.98	79.26	89.54	56.88	65.96	75.02	116.16	131.90	147.62	102.86	116.78	130.68	156.10	174.86	193.60	140.36	157.30	174.24
48	68.98	79.26	89.54	59.30	68.38	77.44	121.00	137.94	154.88	105.28	119.20	133.10	164.56	183.92	203.28	144.00	161.54	179.08
49	72.60	83.50	94.38	60.50	70.18	79.86	123.42	140.36	157.30	106.48	121.00	135.52	170.62	190.58	210.54	148.84	166.38	183.92
50	72.60	83.50	94.38	62.92	72.60	82.28	127.06	144.60	162.14	108.90	123.42	137.94	182.72	203.90	225.06	152.46	170.62	188.76
51	75.02	87.12	99.22	64.14	74.42	84.70	130.68	148.84	166.98	114.96	130.08	145.20	187.56	208.74	229.90	156.10	174.86	193.60
52	77.44	89.54	101.64	64.14	74.42	84.70	133.10	151.26	169.40	114.96	130.08	145.20	193.60	215.38	237.16	163.36	182.12	200.86
53	78.66	91.36	104.06	70.18	81.08	91.96	136.74	155.50	174.24	118.58	134.32	150.04	199.66	222.04	244.42	166.98	186.34	205.70
54	78.66	91.36	104.06	70.18	81.08	91.96	142.78	162.14	181.50	121.00	136.74	152.46	208.12	231.12	254.10	170.62	190.58	210.54
55	82.28	95.60	108.90	75.02	87.12	99.22	146.42	166.38	186.34	125.84	142.78	159.72	216.60	240.20	263.78	177.88	199.06	220.22
56	88.34	102.26	116.16	77.44	89.54	101.64	156.10	177.28	198.44	134.32	151.86	169.40	229.90	254.10	278.30	191.18	212.96	234.74
57	96.80	111.32	125.84	83.50	96.20	108.90	166.98	188.76	210.54	145.20	163.36	181.50	240.80	265.60	290.40	204.50	226.88	249.26
58	102.86	117.98	133.10	89.54	102.86	116.16	175.46	197.84	220.22	153.68	172.44	191.18	255.32	281.34	307.34	215.38	238.38	261.36
59	108.90	124.64	140.36	95.60	109.52	123.42	188.76	211.76	234.74	164.56	183.92	203.28	268.62	295.24	321.86	228.70	252.30	275.88
60	118.58	135.52	152.46	101.64	116.16	130.68	197.24	220.84	244.42	177.88	199.06	220.22	279.52	306.74	333.96	239.58	263.78	287.98
61	124.64	142.18	159.72	106.48	121.00	135.52	208.12	232.32	256.52	188.76	210.54	232.32	292.82	320.66	348.48	252.90	277.70	302.50
62	130.68	148.84	166.98	110.12	125.24	140.36	219.02	243.82	268.62	197.24	219.62	242.00	303.72	332.16	360.58	267.42	293.44	319.44
63	136.74	155.50	174.24	118.58	134.32	150.04	231.12	257.14	283.14	208.12	231.12	254.10	317.02	346.06	375.10	278.30	304.92	331.54
64	145.20	164.56	183.92	125.84	142.78	159.72	239.58	266.20	292.82	216.60	240.20	263.78	330.34	359.98	389.62	291.62	318.84	346.06
65	153.68	174.86	196.02	131.90	149.44	166.98	254.10	281.94	309.76	231.12	255.92	280.72	344.86	375.72	406.56	303.72	332.16	360.58
66	180.30	202.68	225.06	153.68	172.44	191.18	294.04	323.68	353.32	263.78	290.40	317.02	392.04	424.72	457.38	342.44	373.30	404.14
67	210.54	234.74	258.94	182.72	203.90	225.06	335.18	367.24	399.30	298.88	327.32	355.74	440.44	475.54	510.62	379.94	412.62	445.28
68	239.58	266.20	292.82	205.70	228.70	251.68	375.10	408.98	442.86	335.18	366.04	396.88	485.22	522.12	559.02	418.66	453.76	488.84
69	272.26	300.70	329.12	231.12	255.92	280.72	413.82	450.12	486.42	372.68	405.36	438.02	537.24	577.18	617.10	456.18	493.08	529.98
70	301.30	332.16	363.00	255.32	282.54	309.76	454.96	493.68	532.40	406.56	441.66	476.74	584.44	626.18	667.92	491.26	529.98	568.70
71	327.92	359.98	392.04	279.52	307.96	336.38	496.10	537.24	578.38	440.44	476.74	513.04	629.20	672.76	716.32	529.98	571.12	612.26
72	360.58	394.46	428.34	303.72	334.58	365.42	536.04	579.00	621.94	477.96	516.08	554.18	681.24	727.82	774.40	567.50	610.46	653.40
73	389.62	425.92	462.22	329.12	361.80	394.46	577.18	622.56	667.92	511.84	552.38	592.90	727.22	776.22	825.22	606.22	651.60	696.96
74	417.46	455.58	493.68	353.32	388.42	423.50	617.10	664.30	711.48	546.92	589.28	631.62	774.40	825.22	876.04	643.72	690.92	738.10
75	451.34	491.88	532.40	381.16	418.06	454.96	661.88	712.10	762.30	585.64	630.42	675.18	826.44	880.28	934.12	686.08	736.30	786.50
76	487.64	533.02	578.38	412.62	454.36	496.10	711.48	767.14	822.80	630.42	680.64	730.84	880.88	940.18	999.46	730.84	786.50	842.16
77	526.36	576.58	626.78	444.08	490.66	537.24	763.52	824.62	885.72	672.76	728.42	784.08	937.76	999.98	999.98	778.04	839.14	900.24
78	562.66	617.72	672.76	475.54	526.96	578.38	813.12	879.68	946.22	717.54	778.64	839.74	992.20	999.98	999.98	825.22	891.78	958.32
79	601.38	661.28	721.16	507.00	563.26	619.52	865.16	938.36	999.98	764.72	832.48	900.24	999.98	999.98	999.98	873.62	946.22	999.98

EXHIBIT XII

RiverSource Life Insurance Company  
Current Annual Premiums

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

6 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option							
	Deductible			Deductible			Deductible			Deductible			Deductible			Deductible				
	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days		
	Home Care Percentage	50%	75%	100%	Home Care Percentage	50%	75%	100%	Home Care Percentage	50%	75%	100%	Home Care Percentage	50%	75%	100%	Home Care Percentage	50%	75%	100%
40	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	96.80	108.90	121.00		
41	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	96.80	108.90	121.00		
42	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	96.80	108.90	121.00		
43	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	96.80	108.90	121.00		
44	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	96.80	108.90	121.00		
45	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	96.80	108.90	121.00		
46	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	99.22	111.32	123.42		
47	56.88	65.96	75.02	48.40	55.66	62.92	84.70	96.80	108.90	70.18	79.86	89.54	119.80	134.92	150.04	102.86	115.56	128.26		
48	56.88	65.96	75.02	49.62	57.48	65.34	88.34	101.04	113.74	73.82	84.10	94.38	122.22	137.34	152.46	105.28	117.98	130.68		
49	58.08	67.76	77.44	49.62	57.48	65.34	93.18	105.88	118.58	76.24	86.52	96.80	125.84	141.58	157.30	111.32	124.64	137.94		
50	60.50	70.18	79.86	53.24	61.72	70.18	96.80	110.12	123.42	79.86	90.76	101.64	128.26	144.00	159.72	117.38	131.30	145.20		
51	61.72	72.00	82.28	53.24	61.72	70.18	100.44	114.36	128.26	79.86	90.76	101.64	133.10	150.04	166.98	119.80	133.72	147.62		
52	61.72	72.00	82.28	53.24	61.72	70.18	102.86	116.78	130.68	82.28	93.18	104.06	137.94	154.88	171.82	123.42	137.94	152.46		
53	62.92	73.82	84.70	54.46	63.54	72.60	106.48	121.00	135.52	87.12	99.22	111.32	141.58	159.12	176.66	125.84	140.36	154.88		
54	62.92	73.82	84.70	54.46	63.54	72.60	110.12	125.24	140.36	91.96	104.06	116.16	144.00	161.54	179.08	129.48	144.60	159.72		
55	67.76	79.86	91.96	58.08	67.76	77.44	116.16	131.90	147.62	95.60	108.30	121.00	147.62	165.78	183.92	137.94	153.68	169.40		
56	72.60	84.70	96.80	60.50	70.18	79.86	123.42	140.36	157.30	101.64	114.96	128.26	156.10	174.86	193.60	145.20	162.14	179.08		
57	78.66	91.36	104.06	64.14	74.42	84.70	129.48	147.02	164.56	107.70	121.62	135.52	166.98	186.34	205.70	153.68	171.22	188.76		
58	84.70	98.02	111.32	70.18	81.08	91.96	140.36	158.52	176.66	118.58	133.10	147.62	180.30	200.26	220.22	164.56	182.72	200.86		
59	88.34	102.26	116.16	77.44	89.54	101.64	146.42	165.18	183.92	124.64	139.76	154.88	189.98	211.16	232.32	173.04	191.80	210.54		
60	96.80	111.32	125.84	81.08	93.78	106.48	154.88	174.24	193.60	135.52	151.26	166.98	203.28	225.06	246.84	183.92	203.28	222.64		
61	101.64	116.16	130.68	83.50	96.20	108.90	163.36	183.32	203.28	142.78	159.72	176.66	211.76	234.14	256.52	192.40	212.36	232.32		
62	105.28	120.40	135.52	89.54	102.86	116.16	170.62	191.80	212.96	148.84	166.38	183.92	220.22	243.22	266.20	204.50	225.68	246.84		
63	111.32	127.06	142.78	95.60	109.52	123.42	179.08	200.86	222.64	159.72	177.88	196.02	233.54	257.14	280.72	212.96	234.74	256.52		
64	121.00	137.94	154.88	99.22	113.74	128.26	187.56	209.94	232.32	165.78	184.54	203.28	244.42	268.62	292.82	223.86	246.24	268.62		
65	127.06	144.60	162.14	105.28	120.40	135.52	197.24	220.84	244.42	175.46	195.42	215.38	257.74	283.76	309.76	232.32	255.32	278.30		
66	146.42	165.18	183.92	123.42	140.36	157.30	223.86	249.88	275.88	203.28	225.06	246.84	292.82	320.66	348.48	257.74	282.54	307.34		
67	168.20	189.38	210.54	142.78	160.94	179.08	254.10	281.94	309.76	231.12	254.72	278.30	327.92	358.78	389.62	285.56	313.40	341.22		
68	187.56	209.94	232.32	157.30	176.66	196.02	281.94	311.58	341.22	257.74	283.76	309.76	363.00	395.68	428.34	315.82	345.46	375.10		
69	208.12	232.32	256.52	179.08	200.86	222.64	308.56	340.62	372.68	284.36	311.58	338.80	400.52	436.22	471.90	343.64	376.32	408.98		
70	227.48	254.10	280.72	198.44	221.44	244.42	338.80	372.68	406.56	312.18	341.22	370.26	433.18	470.70	508.20	373.90	409.60	445.28		
71	246.84	274.68	302.50	215.38	239.58	263.78	367.84	404.14	440.44	341.22	372.68	404.14	470.70	511.24	551.76	401.72	439.24	476.74		
72	267.42	297.06	326.70	237.16	263.78	290.40	393.26	431.38	469.48	365.42	398.10	430.76	505.78	548.14	590.48	429.56	470.10	510.62		
73	287.98	319.44	350.90	254.10	281.94	309.76	422.30	462.84	503.36	396.88	431.98	467.06	540.88	586.26	631.62	457.38	499.74	542.08		
74	308.56	341.84	375.10	273.46	302.50	331.54	452.54	494.90	537.24	422.30	459.20	496.10	575.96	623.16	670.34	485.22	530.60	575.96		
75	332.76	368.46	404.14	292.82	324.28	355.74	482.80	528.18	573.54	450.12	488.84	527.56	615.90	666.12	716.32	516.68	564.48	612.26		
76	373.90	412.02	450.12	333.96	367.84	401.72	538.46	587.46	636.46	505.78	548.14	590.48	672.76	727.22	781.66	573.54	625.58	677.60		
77	416.24	457.38	498.52	376.32	413.22	450.12	592.90	644.94	696.96	561.44	607.42	653.40	732.06	790.74	849.42	632.84	689.10	745.36		
78	457.38	500.94	544.50	418.66	458.60	498.52	652.20	708.46	764.72	620.74	670.96	721.16	791.34	854.26	917.18	692.12	752.62	813.12		
79	503.36	550.56	597.74	463.44	506.40	549.34	710.28	770.18	830.06	678.82	732.66	786.50	849.42	915.98	982.52	749.00	813.74	878.46		

EXHIBIT XII

RiverSource Life Insurance Company  
Current Annual Premiums

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

4 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible						Deductible						Deductible					
	20 days			90 days			20 days			90 days			20 days			90 days		
	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage
40	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
41	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
42	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
43	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
44	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
45	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
46	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
47	45.98	53.24	60.50	32.68	38.12	43.56	70.18	79.86	89.54	55.66	64.14	72.60	108.90	121.00	133.10	91.96	101.64	111.32
48	47.20	55.06	62.92	33.88	39.94	45.98	71.40	81.68	91.96	58.08	66.56	75.02	110.12	122.82	135.52	95.60	105.88	116.16
49	49.62	57.48	65.34	36.30	42.36	48.40	73.82	84.10	94.38	59.30	68.38	77.44	112.54	125.24	137.94	95.60	105.88	116.16
50	50.82	59.30	67.76	38.72	45.98	53.24	77.44	88.34	99.22	61.72	70.80	79.86	116.16	129.48	142.78	99.22	110.12	121.00
51	50.82	59.30	67.76	38.72	45.98	53.24	77.44	88.34	99.22	61.72	70.80	79.86	116.16	129.48	142.78	99.22	110.12	121.00
52	53.24	61.72	70.18	43.56	50.82	58.08	79.86	90.76	101.64	62.92	72.60	82.28	118.58	131.90	145.20	99.22	110.12	121.00
53	54.46	63.54	72.60	44.78	52.64	60.50	82.28	94.38	106.48	67.76	77.44	87.12	119.80	133.72	147.62	104.06	116.16	128.26
54	54.46	63.54	72.60	44.78	52.64	60.50	84.70	96.80	108.90	67.76	77.44	87.12	122.22	136.14	150.04	104.06	116.16	128.26
55	58.08	67.76	77.44	48.40	56.88	65.34	88.34	101.04	113.74	71.40	81.68	91.96	125.84	140.36	154.88	110.12	122.82	135.52
56	60.50	70.18	79.86	50.82	59.30	67.76	96.80	110.12	123.42	77.44	88.34	99.22	134.32	149.44	164.56	116.16	129.48	142.78
57	64.14	74.42	84.70	54.46	63.54	72.60	102.86	116.78	130.68	84.70	96.80	108.90	140.36	156.10	171.82	122.22	136.14	150.04
58	70.18	81.08	91.96	58.08	67.76	77.44	108.90	123.42	137.94	93.18	105.88	118.58	151.26	168.80	186.34	128.26	142.78	157.30
59	77.44	89.54	101.64	61.72	72.00	82.28	117.38	132.50	147.62	99.22	112.54	125.84	159.72	177.88	196.02	140.36	156.10	171.82
60	81.08	93.78	106.48	70.18	81.08	91.96	125.84	142.78	159.72	108.90	123.42	137.94	169.40	188.76	208.12	147.62	164.56	181.50
61	84.70	98.02	111.32	72.60	83.50	94.38	131.90	149.44	166.98	117.38	132.50	147.62	175.46	195.42	215.38	153.68	171.22	188.76
62	90.76	104.68	118.58	77.44	89.54	101.64	140.36	158.52	176.66	123.42	139.16	154.88	185.14	206.32	227.48	165.78	184.54	203.28
63	96.80	111.32	125.84	81.08	93.78	106.48	146.42	165.18	183.92	130.68	147.62	164.56	194.82	217.20	239.58	171.82	191.18	210.54
64	100.44	115.56	130.68	84.70	98.02	111.32	152.46	171.82	191.18	139.16	156.70	174.24	200.86	223.86	246.84	180.30	200.26	220.22
65	106.48	122.22	137.94	90.76	104.68	118.58	165.78	186.96	208.12	148.84	167.60	186.34	212.96	237.16	261.36	191.18	212.96	234.74
66	124.64	142.18	159.72	105.28	120.40	135.52	187.56	209.94	232.32	168.20	188.16	208.12	239.58	266.20	292.82	214.18	237.78	261.36
67	142.78	162.14	181.50	123.42	140.36	157.30	210.54	234.74	258.94	192.40	214.78	237.16	267.42	295.86	324.28	240.80	266.82	292.82
68	158.52	179.70	200.86	140.36	158.52	176.66	237.16	263.78	290.40	214.18	237.78	261.36	298.88	329.74	360.58	266.20	294.04	321.86
69	176.66	199.66	222.64	152.46	171.82	191.18	260.16	288.60	317.02	235.96	261.98	287.98	327.92	361.20	394.46	296.46	327.32	358.16
70	194.82	219.62	244.42	171.82	193.60	215.38	286.78	317.64	348.48	258.94	286.78	314.60	356.96	392.66	428.34	321.86	354.54	387.20
71	212.96	239.58	266.20	188.76	211.76	234.74	309.76	342.44	375.10	280.72	309.76	338.80	384.78	422.30	459.80	346.06	381.16	416.24
72	228.70	257.14	285.56	200.86	225.06	249.26	333.96	369.06	404.14	302.50	333.96	365.42	415.04	455.58	496.10	372.68	410.20	447.70
73	245.64	275.28	304.92	219.02	245.04	271.04	359.38	396.28	433.18	324.28	356.96	389.62	442.86	485.22	527.56	399.30	439.24	479.16
74	265.00	297.06	329.12	235.96	263.18	290.40	384.78	423.50	462.22	348.48	383.58	418.66	474.32	519.10	563.86	424.72	466.46	508.20
75	285.56	319.44	353.32	254.10	283.14	312.18	411.40	452.54	493.68	371.48	408.38	445.28	503.36	550.56	597.74	454.96	499.74	544.50
76	325.50	362.40	399.30	291.62	323.68	355.74	454.96	499.74	544.50	415.04	455.58	496.10	548.14	599.56	650.98	499.74	548.74	597.74
77	363.00	402.94	442.86	331.54	366.64	401.72	499.74	547.54	595.32	459.80	503.36	546.92	592.90	648.56	704.22	543.30	595.94	648.56
78	404.14	446.50	488.84	372.68	410.20	447.70	546.92	598.96	650.98	507.00	554.80	602.58	640.10	700.00	759.88	590.48	647.36	704.22
79	445.28	491.26	537.24	413.82	454.96	496.10	592.90	648.56	704.22	552.98	604.40	655.82	684.86	749.00	813.12	635.26	696.36	757.46
80				454.96	498.52					600.16	655.82					682.44	747.78	
81				494.90	541.48					648.56	707.86					727.22	796.80	
82				538.46	588.68					695.76	759.28					774.40	848.22	
83				582.02	635.86					742.94	810.70					821.60	899.64	
84				621.94	678.82					788.92	860.32					868.78	951.06	

EXHIBIT XII

RiverSource Life Insurance Company  
Current Annual Premiums

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

2 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible						Deductible						Deductible					
	20 days			90 days			20 days			90 days			20 days			90 days		
	Home Care	Percentage		Home Care	Percentage		Home Care	Percentage		Home Care	Percentage		Home Care	Percentage		Home Care	Percentage	
40	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
41	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
42	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
43	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
44	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
45	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
46	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
47	32.68	38.12	43.56	25.42	29.66	33.88	54.46	62.32	70.18	43.56	49.62	55.66	77.44	87.12	96.80	64.14	72.00	79.86
48	33.88	39.94	45.98	26.62	31.46	36.30	55.66	64.14	72.60	45.98	53.24	60.50	77.44	87.12	96.80	67.76	76.24	84.70
49	33.88	39.94	45.98	26.62	31.46	36.30	58.08	66.56	75.02	48.40	55.66	62.92	81.08	91.36	101.64	67.76	76.24	84.70
50	38.72	45.98	53.24	30.26	35.70	41.14	61.72	70.80	79.86	52.04	59.90	67.76	81.08	91.36	101.64	71.40	80.48	89.54
51	38.72	45.98	53.24	30.26	35.70	41.14	61.72	70.80	79.86	52.04	59.90	67.76	84.70	95.60	106.48	73.82	82.90	91.96
52	38.72	45.98	53.24	30.26	35.70	41.14	66.56	75.64	84.70	54.46	62.32	70.18	84.70	95.60	106.48	73.82	82.90	91.96
53	39.94	47.80	55.66	31.46	37.52	43.56	67.76	77.44	87.12	55.66	64.14	72.60	91.96	104.06	116.16	77.44	87.12	96.80
54	39.94	47.80	55.66	31.46	37.52	43.56	70.18	79.86	89.54	58.08	66.56	75.02	91.96	104.06	116.16	79.86	89.54	99.22
55	45.98	54.46	62.92	36.30	43.56	50.82	73.82	84.10	94.38	61.72	70.80	79.86	95.60	108.30	121.00	83.50	93.78	104.06
56	48.40	56.88	65.34	36.30	43.56	50.82	76.24	86.52	96.80	66.56	75.64	84.70	99.22	112.54	125.84	89.54	100.44	111.32
57	52.04	61.12	70.18	39.94	47.80	55.66	82.28	93.18	104.06	72.60	82.28	91.96	105.28	119.20	133.10	94.38	106.48	118.58
58	55.66	65.34	75.02	45.98	54.46	62.92	87.12	99.22	111.32	76.24	86.52	96.80	113.74	128.26	142.78	100.44	113.14	125.84
59	59.30	69.58	79.86	48.40	56.88	65.34	95.60	108.30	121.00	82.28	93.18	104.06	119.80	134.92	150.04	104.06	117.38	130.68
60	65.34	76.24	87.12	52.04	61.12	70.18	99.22	112.54	125.84	87.12	99.22	111.32	125.84	141.58	157.30	112.54	126.46	140.36
61	70.18	81.08	91.96	55.66	65.34	75.02	105.28	119.20	133.10	95.60	108.30	121.00	133.10	150.04	166.98	116.16	130.68	145.20
62	75.02	87.12	99.22	58.08	67.76	77.44	108.90	123.42	137.94	99.22	112.54	125.84	141.58	159.12	176.66	119.80	134.92	150.04
63	78.66	91.36	104.06	61.72	72.00	82.28	117.38	132.50	147.62	105.28	119.20	133.10	147.62	165.78	183.92	125.84	141.58	157.30
64	82.28	95.60	108.90	65.34	76.24	87.12	121.00	136.74	152.46	108.90	123.42	137.94	153.68	172.44	191.18	130.68	147.62	164.56
65	88.34	102.26	116.16	72.60	84.70	96.80	128.26	145.20	162.14	117.38	132.50	147.62	162.14	181.50	200.86	139.16	156.70	174.24
66	100.44	115.56	130.68	82.28	95.60	108.90	142.78	160.94	179.08	128.26	145.20	162.14	182.72	203.90	225.06	151.26	170.02	188.76
67	111.32	128.26	145.20	91.96	106.48	121.00	154.88	174.24	193.60	140.36	158.52	176.66	199.66	222.04	244.42	165.78	185.74	205.70
68	125.84	144.00	162.14	104.06	119.80	135.52	171.82	193.60	215.38	150.04	169.40	188.76	220.22	244.42	268.62	180.30	202.68	225.06
69	135.52	154.88	174.24	114.96	132.50	150.04	186.34	209.34	232.32	160.94	182.12	203.28	240.80	266.82	292.82	194.82	218.42	242.00
70	152.46	174.24	196.02	127.06	145.82	164.56	202.08	226.88	251.68	173.04	195.42	217.80	261.36	289.20	317.02	211.76	237.78	263.78
71	162.14	185.14	208.12	136.74	156.70	176.66	217.80	244.42	271.04	182.72	206.32	229.90	280.72	309.76	338.80	223.86	251.08	278.30
72	174.24	198.44	222.64	150.04	171.82	193.60	229.90	257.74	285.56	194.82	219.62	244.42	301.30	332.16	363.00	238.38	266.82	295.24
73	187.56	213.58	239.58	159.72	182.72	205.70	245.64	275.28	304.92	205.70	232.32	258.94	321.86	354.54	387.20	252.90	283.76	314.60
74	199.66	226.88	254.10	171.82	196.02	220.22	261.36	292.82	324.28	217.80	245.64	273.46	341.22	375.10	408.98	267.42	299.48	331.54
75	212.96	242.00	271.04	185.14	211.16	237.16	277.10	310.38	343.64	227.48	256.52	285.56	363.00	399.30	435.60	285.56	319.44	353.32
76	243.22	275.28	307.34	211.76	240.20	268.62	302.50	338.80	375.10	252.90	284.96	317.02	392.04	430.76	469.48	315.82	352.72	389.62
77	273.46	308.56	343.64	244.42	275.88	307.34	331.54	370.26	408.98	280.72	315.82	350.90	422.30	464.04	505.78	346.06	386.00	425.92
78	303.72	341.84	379.94	275.88	310.98	346.06	356.96	398.70	440.44	304.92	342.44	379.94	454.96	499.74	544.50	377.52	419.88	462.22
79	333.96	375.10	416.24	302.50	340.02	377.52	386.00	431.38	476.74	336.38	377.52	418.66	484.00	531.20	578.38	407.78	453.16	498.52
80				336.38	377.52					360.58	404.14					436.82	484.62	
81				365.42	408.98					388.42	435.00					469.48	520.30	
82				396.88	444.08					417.46	467.68					499.74	553.58	
83				430.76	481.58					446.50	500.34					531.20	587.46	
84				462.22	516.68					476.74	533.62					561.44	620.74	

EXHIBIT XIII

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

LIFETIME BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible						Deductible						Deductible					
	20 days			90 days			20 days			90 days			20 days			90 days		
	Home Care	Percentage		Home Care	Percentage		Home Care	Percentage		Home Care	Percentage		Home Care	Percentage		Home Care	Percentage	
40	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
41	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
42	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
43	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
44	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
45	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
46	74.54	85.18	95.84	61.22	70.56	79.86	121.14	137.76	154.40	109.14	123.80	138.42	165.04	185.02	204.98	149.08	166.38	183.68
47	75.88	87.18	98.50	62.56	72.56	82.52	127.78	145.10	162.38	113.14	128.46	143.74	171.72	192.34	212.96	154.40	173.04	191.66
48	75.88	87.18	98.50	65.24	75.22	85.18	133.10	151.74	170.36	115.80	131.12	146.42	181.02	202.32	223.60	158.40	177.70	196.98
49	79.86	91.86	103.82	66.56	77.20	87.84	135.76	154.40	173.04	117.12	133.10	149.08	187.68	209.64	231.60	163.72	183.02	202.32
50	79.86	91.86	103.82	69.22	79.86	90.50	139.76	159.06	178.36	119.80	135.76	151.74	201.00	224.30	247.56	167.70	187.68	207.64
51	82.52	95.84	109.14	70.56	81.86	93.18	143.74	163.72	183.68	126.46	143.08	159.72	206.32	229.62	252.90	171.72	192.34	212.96
52	85.18	98.50	111.80	70.56	81.86	93.18	146.42	166.38	186.34	126.46	143.08	159.72	212.96	236.92	260.88	179.70	200.34	220.94
53	86.52	100.50	114.46	77.20	89.18	101.16	150.42	171.06	191.66	130.44	147.76	165.04	219.62	244.24	268.86	183.68	204.98	226.28
54	86.52	100.50	114.46	77.20	89.18	101.16	157.06	178.36	199.66	133.10	150.42	167.70	228.94	254.24	279.52	187.68	209.64	231.60
55	90.50	105.16	119.80	82.52	95.84	109.14	161.06	183.02	204.98	138.42	157.06	175.70	238.26	264.22	290.16	195.66	218.96	242.24
56	97.18	112.48	127.78	85.18	98.50	111.80	171.72	195.00	218.28	147.76	167.04	186.34	252.90	279.52	306.14	210.30	234.26	258.22
57	106.48	122.46	138.42	91.86	105.82	119.80	183.68	207.64	231.60	159.72	179.70	199.66	264.88	292.16	319.44	224.96	249.56	274.18
58	113.14	129.78	146.42	98.50	113.14	127.78	193.00	217.62	242.24	169.04	189.68	210.30	280.86	309.48	338.08	236.92	262.22	287.50
59	119.80	137.10	154.40	105.16	120.48	135.76	207.64	232.94	258.22	181.02	202.32	223.60	295.48	324.76	354.04	251.58	277.54	303.46
60	130.44	149.08	167.70	111.80	127.78	143.74	216.96	242.92	268.86	195.66	218.96	242.24	307.48	337.42	367.36	263.54	290.16	316.78
61	137.10	156.40	175.70	117.12	133.10	149.08	228.94	255.56	282.18	207.64	231.60	255.56	322.10	352.72	383.32	278.20	305.48	332.76
62	143.74	163.72	183.68	121.14	137.76	154.40	240.92	268.20	295.48	216.96	241.58	266.20	334.10	365.38	396.64	294.16	322.78	351.38
63	150.42	171.06	191.66	130.44	147.76	165.04	254.24	282.86	311.46	228.94	254.24	279.52	348.72	380.66	412.62	306.14	335.42	364.70
64	159.72	181.02	202.32	138.42	157.06	175.70	263.54	292.82	322.10	238.26	264.22	290.16	363.38	395.98	428.58	320.78	350.72	380.66
65	169.04	192.34	215.62	145.10	164.38	183.68	279.52	310.14	340.74	254.24	281.52	308.80	379.34	413.30	447.22	334.10	365.38	396.64
66	198.34	222.94	247.56	169.04	189.68	210.30	323.44	356.04	388.66	290.16	319.44	348.72	431.24	467.20	503.12	376.68	410.64	444.56
67	231.60	258.22	284.84	201.00	224.30	247.56	368.70	403.96	439.24	328.76	360.06	391.32	484.48	523.10	561.68	417.94	453.88	489.80
68	263.54	292.82	322.10	226.28	251.58	276.84	412.62	449.88	487.14	368.70	402.64	436.56	533.74	574.34	614.92	460.52	499.14	537.72
69	299.48	330.78	362.04	254.24	281.52	308.80	455.20	495.14	535.06	409.94	445.90	481.82	590.96	634.90	678.82	501.80	542.38	582.98
70	331.44	365.38	399.30	280.86	310.80	340.74	500.46	543.04	585.64	447.22	485.82	524.42	642.88	688.80	734.72	540.38	582.98	625.58
71	360.72	395.98	431.24	307.48	338.76	370.02	545.72	590.96	636.22	484.48	524.42	564.34	692.12	740.04	787.96	582.98	628.24	673.48
72	396.64	433.90	471.18	334.10	368.04	401.96	589.64	636.90	684.14	525.76	567.68	609.60	749.36	800.60	851.84	624.26	671.50	718.74
73	428.58	468.52	508.44	362.04	397.98	433.90	634.90	684.82	734.72	563.02	607.62	652.20	799.94	853.84	907.74	666.84	716.76	766.66
74	459.20	501.14	543.04	388.66	427.26	465.86	678.82	730.74	782.62	601.62	648.20	694.78	851.84	907.74	963.64	708.10	760.02	811.92
75	496.48	541.06	585.64	419.28	459.86	500.46	728.06	783.32	838.54	644.20	693.46	742.70	909.08	968.30	999.98	754.68	809.94	865.16
76	536.40	586.32	636.22	453.88	499.80	545.72	782.62	843.86	905.08	693.46	748.70	803.92	968.96	999.98	999.98	803.92	865.16	926.38
77	579.00	634.24	689.46	488.48	539.72	590.96	839.88	907.08	974.30	740.04	801.26	862.48	999.98	999.98	999.98	855.84	923.06	990.26
78	618.92	679.50	740.04	523.10	579.66	636.22	894.44	967.64	999.98	789.30	856.50	923.72	999.98	999.98	999.98	907.74	980.96	999.98
79	661.52	727.40	793.28	557.70	619.58	681.48	951.68	999.98	999.98	841.20	915.72	990.26	999.98	999.98	999.98	960.98	999.98	999.98

EXHIBIT XIII

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

6 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible			Deductible			Deductible			Deductible			Deductible			Deductible		
	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days
	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage
40	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
41	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
42	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
43	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
44	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
45	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
46	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	109.14	122.46	135.76
47	62.56	72.56	82.52	53.24	61.22	69.22	93.18	106.48	119.80	77.20	87.84	98.50	131.78	148.42	165.04	113.14	127.12	141.08
48	62.56	72.56	82.52	54.58	63.22	71.88	97.18	111.14	125.12	81.20	92.52	103.82	134.44	151.08	167.70	115.80	129.78	143.74
49	63.88	74.54	85.18	54.58	63.22	71.88	102.50	116.46	130.44	83.86	95.18	106.48	138.42	155.74	173.04	122.46	137.10	151.74
50	66.56	77.20	87.84	58.56	67.90	77.20	106.48	121.14	135.76	87.84	99.84	111.80	141.08	158.40	175.70	129.12	144.44	159.72
51	67.90	79.20	90.50	58.56	67.90	77.20	110.48	125.80	141.08	87.84	99.84	111.80	146.42	165.04	183.68	131.78	147.10	162.38
52	67.90	79.20	90.50	58.56	67.90	77.20	113.14	128.46	143.74	90.50	102.50	114.46	151.74	170.36	189.00	135.76	151.74	167.70
53	69.22	81.20	93.18	59.90	69.90	79.86	117.12	133.10	149.08	95.84	109.14	122.46	155.74	175.04	194.32	138.42	154.40	170.36
54	69.22	81.20	93.18	59.90	69.90	79.86	121.14	137.76	154.40	101.16	114.46	127.78	158.40	177.70	196.98	142.42	159.06	175.70
55	74.54	87.84	101.16	63.88	74.54	85.18	127.78	145.10	162.38	105.16	119.14	133.10	162.38	182.36	202.32	151.74	169.04	186.34
56	79.86	93.18	106.48	66.56	77.20	87.84	135.76	154.40	173.04	111.80	126.46	141.08	171.72	192.34	212.96	159.72	178.36	196.98
57	86.52	100.50	114.46	70.56	81.86	93.18	142.42	161.72	181.02	118.48	133.78	149.08	183.68	204.98	226.28	169.04	188.34	207.64
58	93.18	107.82	122.46	77.20	89.18	101.16	154.40	174.38	194.32	130.44	146.42	162.38	198.34	220.28	242.24	181.02	201.00	220.94
59	97.18	112.48	127.78	85.18	98.50	111.80	161.06	181.70	202.32	137.10	153.74	170.36	208.98	232.28	255.56	190.34	210.98	231.60
60	106.48	122.46	138.42	89.18	103.16	117.12	170.36	191.66	212.96	149.08	166.38	183.68	223.60	247.56	271.52	202.32	223.60	244.90
61	111.80	127.78	143.74	91.86	105.82	119.80	179.70	201.66	223.60	157.06	175.70	194.32	232.94	257.56	282.18	211.64	233.60	255.56
62	115.80	132.44	149.08	98.50	113.14	127.78	187.68	210.98	234.26	163.72	183.02	202.32	242.24	267.54	292.82	224.96	248.24	271.52
63	122.46	139.76	157.06	105.16	120.48	135.76	196.98	220.94	244.90	175.70	195.66	215.62	256.90	282.86	308.80	234.26	258.22	282.18
64	133.10	151.74	170.36	109.14	125.12	141.08	206.32	230.94	255.56	182.36	203.00	223.60	268.86	295.48	322.10	246.24	270.86	295.48
65	139.76	159.06	178.36	115.80	132.44	149.08	216.96	242.92	268.86	193.00	214.96	236.92	283.52	312.14	340.74	255.56	280.86	306.14
66	161.06	181.70	202.32	135.76	154.40	173.04	246.24	274.86	303.46	223.60	247.56	271.52	322.10	352.72	383.32	283.52	310.80	338.08
67	185.02	208.32	231.60	157.06	177.04	196.98	279.52	310.14	340.74	254.24	280.20	306.14	360.72	394.66	428.58	314.12	344.74	375.34
68	206.32	230.94	255.56	173.04	194.32	215.62	310.14	342.74	375.34	283.52	312.14	340.74	399.30	435.24	471.18	347.40	380.00	412.62
69	228.94	255.56	282.18	196.98	220.94	244.90	339.42	374.68	409.94	312.80	342.74	372.68	440.58	479.84	519.10	378.00	413.96	449.88
70	250.22	279.52	308.80	218.28	243.58	268.86	372.68	409.94	447.22	343.40	375.34	407.28	476.50	517.78	559.02	411.30	450.56	489.80
71	271.52	302.14	332.76	236.92	263.54	290.16	404.62	444.56	484.48	375.34	409.94	444.56	517.78	562.36	606.94	441.90	483.16	524.42
72	294.16	326.76	359.38	260.88	290.16	319.44	432.58	474.52	516.42	401.96	437.92	473.84	556.36	602.96	649.52	472.52	517.12	561.68
73	316.78	351.38	386.00	279.52	310.14	340.74	464.54	509.12	553.70	436.56	475.18	513.76	594.96	644.88	694.78	503.12	549.72	596.28
74	339.42	376.02	412.62	300.80	332.76	364.70	497.80	544.40	590.96	464.54	505.12	545.72	633.56	685.48	737.38	533.74	583.66	633.56
75	366.04	405.30	444.56	322.10	356.70	391.32	531.08	581.00	630.90	495.14	537.72	580.32	677.50	732.74	787.96	568.34	620.92	673.48
76	411.30	453.22	495.14	367.36	404.62	441.90	592.30	646.20	700.10	556.36	602.96	649.52	740.04	799.94	859.82	630.90	688.14	745.36
77	457.86	503.12	548.38	413.96	454.54	495.14	652.20	709.44	766.66	617.58	668.16	718.74	805.26	869.82	934.36	696.12	758.02	819.90
78	503.12	551.04	598.96	460.52	504.46	548.38	717.42	779.30	841.20	682.82	738.06	793.28	870.48	939.68	999.98	761.34	827.88	894.44
79	553.70	605.62	657.52	509.78	557.04	604.28	781.30	847.20	913.06	746.70	805.92	865.16	934.36	999.98	999.98	823.90	895.12	966.30

EXHIBIT XIII

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

4 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible						Deductible						Deductible					
	20 days			90 days			20 days			90 days			20 days			90 days		
	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage
	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%
40	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
41	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
42	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
43	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
44	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
45	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
46	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
47	50.58	58.56	66.56	35.94	41.94	47.92	77.20	87.84	98.50	61.22	70.56	79.86	119.80	133.10	146.42	101.16	111.80	122.46
48	51.92	60.56	69.22	37.26	43.94	50.58	78.54	89.84	101.16	63.88	73.22	82.52	121.14	135.10	149.08	105.16	116.46	127.78
49	54.58	63.22	71.88	39.94	46.60	53.24	81.20	92.52	103.82	65.24	75.22	85.18	123.80	137.76	151.74	105.16	116.46	127.78
50	55.90	65.24	74.54	42.60	50.58	58.56	85.18	97.18	109.14	67.90	77.88	87.84	127.78	142.42	157.06	109.14	121.14	133.10
51	55.90	65.24	74.54	42.60	50.58	58.56	85.18	97.18	109.14	67.90	77.88	87.84	127.78	142.42	157.06	109.14	121.14	133.10
52	58.56	67.90	77.20	47.92	55.90	63.88	87.84	99.84	111.80	69.22	79.86	90.50	130.44	145.10	159.72	109.14	121.14	133.10
53	59.90	69.90	79.86	49.26	57.90	66.56	90.50	103.82	117.12	74.54	85.18	95.84	131.78	147.10	162.38	114.46	127.78	141.08
54	59.90	69.90	79.86	49.26	57.90	66.56	93.18	106.48	119.80	74.54	85.18	95.84	134.44	149.76	165.04	114.46	127.78	141.08
55	63.88	74.54	85.18	53.24	62.56	71.88	97.18	111.14	125.12	78.54	89.84	101.16	138.42	154.40	170.36	121.14	135.10	149.08
56	66.56	77.20	87.84	55.90	65.24	74.54	106.48	121.14	135.76	85.18	97.18	109.14	147.76	164.38	181.02	127.78	142.42	157.06
57	70.56	81.86	93.18	59.90	69.90	79.86	113.14	128.46	143.74	93.18	106.48	119.80	154.40	171.72	189.00	134.44	149.76	165.04
58	77.20	89.18	101.16	63.88	74.54	85.18	119.80	135.76	151.74	102.50	116.46	130.44	166.38	185.68	204.98	141.08	157.06	173.04
59	85.18	98.50	111.80	67.90	79.20	90.50	129.12	145.76	162.38	109.14	123.80	138.42	175.70	195.66	215.62	154.40	171.72	189.00
60	89.18	103.16	117.12	77.20	89.18	101.16	138.42	157.06	175.70	119.80	135.76	151.74	186.34	207.64	228.94	162.38	181.02	199.66
61	93.18	107.82	122.46	79.86	91.86	103.82	145.10	164.38	183.68	129.12	145.76	162.38	193.00	214.96	236.92	169.04	188.34	207.64
62	99.84	115.14	130.44	85.18	98.50	111.80	154.40	174.38	194.32	135.76	153.08	170.36	203.66	226.96	250.22	182.36	203.00	223.60
63	106.48	122.46	138.42	89.18	103.16	117.12	161.06	181.70	202.32	143.74	162.38	181.02	214.30	238.92	263.54	189.00	210.30	231.60
64	110.48	127.12	143.74	93.18	107.82	122.46	167.70	189.00	210.30	153.08	172.38	191.66	220.94	246.24	271.52	198.34	220.28	242.24
65	117.12	134.44	151.74	99.84	115.14	130.44	182.36	205.66	228.94	163.72	184.36	204.98	234.26	260.88	287.50	210.30	234.26	258.22
66	137.10	156.40	175.70	115.80	132.44	149.08	206.32	230.94	255.56	185.02	206.98	228.94	263.54	292.82	322.10	235.60	261.56	287.50
67	157.06	178.36	199.66	135.76	154.40	173.04	231.60	258.22	284.84	211.64	236.26	260.88	294.16	325.44	356.70	264.88	293.50	322.10
68	174.38	197.68	220.94	154.40	174.38	194.32	260.88	290.16	319.44	235.60	261.56	287.50	328.76	362.72	396.64	292.82	323.44	354.04
69	194.32	219.62	244.90	167.70	189.00	210.30	286.18	317.46	348.72	259.56	288.18	316.78	360.72	397.32	433.90	326.10	360.06	393.98
70	214.30	241.58	268.86	189.00	212.96	236.92	315.46	349.40	383.32	284.84	315.46	346.06	392.66	431.92	471.18	354.04	390.00	425.92
71	234.26	263.54	292.82	207.64	232.94	258.22	340.74	376.68	412.62	308.80	340.74	372.68	423.26	464.54	505.78	380.66	419.28	457.86
72	251.58	282.86	314.12	220.94	247.56	274.18	367.36	405.96	444.56	332.76	367.36	401.96	456.54	501.14	545.72	409.94	451.22	492.48
73	270.20	302.80	335.42	240.92	269.54	298.14	395.32	435.90	476.50	356.70	392.66	428.58	487.14	533.74	580.32	439.24	483.16	527.08
74	291.50	326.76	362.04	259.56	289.50	319.44	423.26	465.86	508.44	383.32	421.94	460.52	521.76	571.02	620.24	467.20	513.10	559.02
75	314.12	351.38	388.66	279.52	311.46	343.40	452.54	497.80	543.04	408.62	449.22	489.80	553.70	605.62	657.52	500.46	549.72	598.96
76	358.06	398.64	439.24	320.78	356.04	391.32	500.46	549.72	598.96	456.54	501.14	545.72	602.96	659.52	716.08	549.72	603.62	657.52
77	399.30	443.24	487.14	364.70	403.30	441.90	549.72	602.30	654.86	505.78	553.70	601.62	652.20	713.42	774.64	597.64	655.54	713.42
78	444.56	491.16	537.72	409.94	451.22	492.48	601.62	658.86	716.08	557.70	610.28	662.84	704.12	770.00	835.86	649.52	712.10	774.64
79	489.80	540.38	590.96	455.20	500.46	545.72	652.20	713.42	774.64	608.28	664.84	721.40	753.34	823.90	894.44	698.78	766.00	833.20
80				500.46	548.38					660.18	721.40					750.68	822.56	
81				544.40	595.62					713.42	778.64					799.94	876.48	
82				592.30	647.54					765.34	835.20					851.84	933.04	
83				640.22	699.44					817.24	891.78					903.76	989.60	
84				684.14	746.70					867.82	946.36					955.66	999.98	

EXHIBIT XIII

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

2 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible			Deductible			Deductible			Deductible			Deductible			Deductible		
	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days
	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage
	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%
40	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
41	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
42	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
43	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
44	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
45	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
46	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
47	35.94	41.94	47.92	27.96	32.62	37.26	59.90	68.56	77.20	47.92	54.58	61.22	85.18	95.84	106.48	70.56	79.20	87.84
48	37.26	43.94	50.58	29.28	34.60	39.94	61.22	70.56	79.86	50.58	58.56	66.56	85.18	95.84	106.48	74.54	83.86	93.18
49	37.26	43.94	50.58	29.28	34.60	39.94	63.88	73.22	82.52	53.24	61.22	69.22	89.18	100.50	111.80	74.54	83.86	93.18
50	42.60	50.58	58.56	33.28	39.28	45.26	67.90	77.88	87.84	57.24	65.90	74.54	89.18	100.50	111.80	78.54	88.52	98.50
51	42.60	50.58	58.56	33.28	39.28	45.26	67.90	77.88	87.84	57.24	65.90	74.54	93.18	105.16	117.12	81.20	91.20	101.16
52	42.60	50.58	58.56	33.28	39.28	45.26	73.22	83.20	93.18	59.90	68.56	77.20	93.18	105.16	117.12	81.20	91.20	101.16
53	43.94	52.58	61.22	34.60	41.28	47.92	74.54	85.18	95.84	61.22	70.56	79.86	101.16	114.46	127.78	85.18	95.84	106.48
54	43.94	52.58	61.22	34.60	41.28	47.92	77.20	87.84	98.50	63.88	73.22	82.52	101.16	114.46	127.78	87.84	98.50	109.14
55	50.58	59.90	69.22	39.94	47.92	55.90	81.20	92.52	103.82	67.90	77.88	87.84	105.16	119.14	133.10	91.86	103.16	114.46
56	53.24	62.56	71.88	39.94	47.92	55.90	83.86	95.18	106.48	73.22	83.20	93.18	109.14	123.80	138.42	98.50	110.48	122.46
57	57.24	67.24	77.20	43.94	52.58	61.22	90.50	102.50	114.46	79.86	90.50	101.16	115.80	131.12	146.42	103.82	117.12	130.44
58	61.22	71.88	82.52	50.58	59.90	69.22	95.84	109.14	122.46	83.86	95.18	106.48	125.12	141.08	157.06	110.48	124.46	138.42
59	65.24	76.54	87.84	53.24	62.56	71.88	105.16	119.14	133.10	90.50	102.50	114.46	131.78	148.42	165.04	114.46	129.12	143.74
60	71.88	83.86	95.84	57.24	67.24	77.20	109.14	123.80	138.42	95.84	109.14	122.46	138.42	155.74	173.04	123.80	139.10	154.40
61	77.20	89.18	101.16	61.22	71.88	82.52	115.80	131.12	146.42	105.16	119.14	133.10	146.42	165.04	183.68	127.78	143.74	159.72
62	82.52	95.84	109.14	63.88	74.54	85.18	119.80	135.76	151.74	109.14	123.80	138.42	155.74	175.04	194.32	131.78	148.42	165.04
63	86.52	100.50	114.46	67.90	79.20	90.50	129.12	145.76	162.38	115.80	131.12	146.42	162.38	182.36	202.32	138.42	155.74	173.04
64	90.50	105.16	119.80	71.88	83.86	95.84	133.10	150.42	167.70	119.80	135.76	151.74	169.04	189.68	210.30	143.74	162.38	181.02
65	97.18	112.48	127.78	79.86	93.18	106.48	141.08	159.72	178.36	129.12	145.76	162.38	178.36	199.66	220.94	153.08	172.38	191.66
66	110.48	127.12	143.74	90.50	105.16	119.80	157.06	177.04	196.98	141.08	159.72	178.36	201.00	224.30	247.56	166.38	187.02	207.64
67	122.46	141.08	159.72	101.16	117.12	133.10	170.36	191.66	212.96	154.40	174.38	194.32	219.62	244.24	268.86	182.36	204.32	226.28
68	138.42	158.40	178.36	114.46	131.78	149.08	189.00	212.96	236.92	165.04	186.34	207.64	242.24	268.86	295.48	198.34	222.94	247.56
69	149.08	170.36	191.66	126.46	145.76	165.04	204.98	230.28	255.56	177.04	200.34	223.60	264.88	293.50	322.10	214.30	240.26	266.20
70	167.70	191.66	215.62	139.76	160.40	181.02	222.28	249.56	276.84	190.34	214.96	239.58	287.50	318.12	348.72	232.94	261.56	290.16
71	178.36	203.66	228.94	150.42	172.38	194.32	239.58	268.86	298.14	201.00	226.96	252.90	308.80	340.74	372.68	246.24	276.18	306.14
72	191.66	218.28	244.90	165.04	189.00	212.96	252.90	283.52	314.12	214.30	241.58	268.86	331.44	365.38	399.30	262.22	293.50	324.76
73	206.32	234.94	263.54	175.70	201.00	226.28	270.20	302.80	335.42	226.28	255.56	284.84	354.04	390.00	425.92	278.20	312.14	346.06
74	219.62	249.56	279.52	189.00	215.62	242.24	287.50	322.10	356.70	239.58	270.20	300.80	375.34	412.62	449.88	294.16	329.42	364.70
75	234.26	266.20	298.14	203.66	232.28	260.88	304.82	341.42	378.00	250.22	282.18	314.12	399.30	439.24	479.16	314.12	351.38	388.66
76	267.54	302.80	338.08	232.94	264.22	295.48	332.76	372.68	412.62	278.20	313.46	348.72	431.24	473.84	516.42	347.40	388.00	428.58
77	300.80	339.42	378.00	268.86	303.46	338.08	364.70	407.28	449.88	308.80	347.40	386.00	464.54	510.44	556.36	380.66	424.60	468.52
78	334.10	376.02	417.94	303.46	342.08	380.66	392.66	438.58	484.48	335.42	376.68	417.94	500.46	549.72	598.96	415.28	461.86	508.44
79	367.36	412.62	457.86	332.76	374.02	415.28	424.60	474.52	524.42	370.02	415.28	460.52	532.40	584.32	636.22	448.56	498.48	548.38
80				370.02	415.28					396.64	444.56					480.50	533.08	
81				401.96	449.88					427.26	478.50					516.42	572.34	
82				436.56	488.48					459.20	514.44					549.72	608.94	
83				473.84	529.74					491.16	550.38					584.32	646.20	
84				508.44	568.34					524.42	586.98					617.58	682.82	

EXHIBIT XIII

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

LIFETIME BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible						Deductible						Deductible					
	20 days			90 days			20 days			90 days			20 days			90 days		
	Home Care	Percentage		Home Care	Percentage		Home Care	Percentage		Home Care	Percentage		Home Care	Percentage		Home Care	Percentage	
40	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
41	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
42	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
43	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
44	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
45	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
46	74.54	85.18	95.84	61.22	70.56	79.86	121.14	137.76	154.40	109.14	123.80	138.42	165.04	185.02	204.98	149.08	166.38	183.68
47	75.88	87.18	98.50	62.56	72.56	82.52	127.78	145.10	162.38	113.14	128.46	143.74	171.72	192.34	212.96	154.40	173.04	191.66
48	75.88	87.18	98.50	65.24	75.22	85.18	133.10	151.74	170.36	115.80	131.12	146.42	181.02	202.32	223.60	158.40	177.70	196.98
49	79.86	91.86	103.82	66.56	77.20	87.84	135.76	154.40	173.04	117.12	133.10	149.08	187.68	209.64	231.60	163.72	183.02	202.32
50	79.86	91.86	103.82	69.22	79.86	90.50	139.76	159.06	178.36	119.80	135.76	151.74	201.00	224.30	247.56	167.70	187.68	207.64
51	82.52	95.84	109.14	70.56	81.86	93.18	143.74	163.72	183.68	126.46	143.08	159.72	206.32	229.62	252.90	171.72	192.34	212.96
52	85.18	98.50	111.80	70.56	81.86	93.18	146.42	166.38	186.34	126.46	143.08	159.72	212.96	236.92	260.88	179.70	200.34	220.94
53	86.52	100.50	114.46	77.20	89.18	101.16	150.42	171.06	191.66	130.44	147.76	165.04	219.62	244.24	268.86	183.68	204.98	226.28
54	86.52	100.50	114.46	77.20	89.18	101.16	157.06	178.36	199.66	133.10	150.42	167.70	228.94	254.24	279.52	187.68	209.64	231.60
55	90.50	105.16	119.80	82.52	95.84	109.14	161.06	183.02	204.98	138.42	157.06	175.70	238.26	264.22	290.16	195.66	218.96	242.24
56	97.18	112.48	127.78	85.18	98.50	111.80	171.72	195.00	218.28	147.76	167.04	186.34	252.90	279.52	306.14	210.30	234.26	258.22
57	106.48	122.46	138.42	91.86	105.82	119.80	183.68	207.64	231.60	159.72	179.70	199.66	264.88	292.16	319.44	224.96	249.56	274.18
58	113.14	129.78	146.42	98.50	113.14	127.78	193.00	217.62	242.24	169.04	189.68	210.30	280.86	309.48	338.08	236.92	262.22	287.50
59	119.80	137.10	154.40	105.16	120.48	135.76	207.64	232.94	258.22	181.02	202.32	223.60	295.48	324.76	354.04	251.58	277.54	303.46
60	130.44	149.08	167.70	111.80	127.78	143.74	216.96	242.92	268.86	195.66	218.96	242.24	307.48	337.42	367.36	263.54	290.16	316.78
61	137.10	156.40	175.70	117.12	133.10	149.08	228.94	255.56	282.18	207.64	231.60	255.56	322.10	352.72	383.32	278.20	305.48	332.76
62	143.74	163.72	183.68	121.14	137.76	154.40	240.92	268.20	295.48	216.96	241.58	266.20	334.10	365.38	396.64	294.16	322.78	351.38
63	150.42	171.06	191.66	130.44	147.76	165.04	254.24	282.86	311.46	228.94	254.24	279.52	348.72	380.66	412.62	306.14	335.42	364.70
64	159.72	181.02	202.32	138.42	157.06	175.70	263.54	292.82	322.10	238.26	264.22	290.16	363.38	395.98	428.58	320.78	350.72	380.66
65	169.04	192.34	215.62	145.10	164.38	183.68	279.52	310.14	340.74	254.24	281.52	308.80	379.34	413.30	447.22	334.10	365.38	396.64
66	198.34	222.94	247.56	169.04	189.68	210.30	323.44	356.04	388.66	290.16	319.44	348.72	431.24	467.20	503.12	376.68	410.64	444.56
67	231.60	258.22	284.84	201.00	224.30	247.56	368.70	403.96	439.24	328.76	360.06	391.32	484.48	523.10	561.68	417.94	453.88	489.80
68	263.54	292.82	322.10	226.28	251.58	276.84	412.62	449.88	487.14	368.70	402.64	436.56	533.74	574.34	614.92	460.52	499.14	537.72
69	299.48	330.78	362.04	254.24	281.52	308.80	455.20	495.14	535.06	409.94	445.90	481.82	590.96	634.90	678.82	501.80	542.38	582.98
70	331.44	365.38	399.30	280.86	310.80	340.74	500.46	543.04	585.64	447.22	485.82	524.42	642.88	688.80	734.72	540.38	582.98	625.58
71	360.72	395.98	431.24	307.48	338.76	370.02	545.72	590.96	636.22	484.48	524.42	564.34	692.12	740.04	787.96	582.98	628.24	673.48
72	396.64	433.90	471.18	334.10	368.04	401.96	589.64	636.90	684.14	525.76	567.68	609.60	749.36	800.60	851.84	624.26	671.50	718.74
73	428.58	468.52	508.44	362.04	397.98	433.90	634.90	684.82	734.72	563.02	607.62	652.20	799.94	853.84	907.74	666.84	716.76	766.66
74	459.20	501.14	543.04	388.66	427.26	465.86	678.82	730.74	782.62	601.62	648.20	694.78	851.84	907.74	963.64	708.10	760.02	811.92
75	496.48	541.06	585.64	419.28	459.86	500.46	728.06	783.32	838.54	644.20	693.46	742.70	909.08	968.30	999.98	754.68	809.94	865.16
76	536.40	586.32	636.22	453.88	499.80	545.72	782.62	843.86	905.08	693.46	748.70	803.92	968.96	999.98	999.98	803.92	865.16	926.38
77	579.00	634.24	689.46	488.48	539.72	590.96	839.88	907.08	974.30	740.04	801.26	862.48	999.98	999.98	999.98	855.84	923.06	990.26
78	618.92	679.50	740.04	523.10	579.66	636.22	894.44	967.64	999.98	789.30	856.50	923.72	999.98	999.98	999.98	907.74	980.96	999.98
79	661.52	727.40	793.28	557.70	619.58	681.48	951.68	999.98	999.98	841.20	915.72	990.26	999.98	999.98	999.98	960.98	999.98	999.98

EXHIBIT XIII

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

6 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible			Deductible			Deductible			Deductible			Deductible			Deductible		
	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days
	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage
40	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
41	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
42	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
43	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
44	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
45	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
46	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	109.14	122.46	135.76
47	62.56	72.56	82.52	53.24	61.22	69.22	93.18	106.48	119.80	77.20	87.84	98.50	131.78	148.42	165.04	113.14	127.12	141.08
48	62.56	72.56	82.52	54.58	63.22	71.88	97.18	111.14	125.12	81.20	92.52	103.82	134.44	151.08	167.70	115.80	129.78	143.74
49	63.88	74.54	85.18	54.58	63.22	71.88	102.50	116.46	130.44	83.86	95.18	106.48	138.42	155.74	173.04	122.46	137.10	151.74
50	66.56	77.20	87.84	58.56	67.90	77.20	106.48	121.14	135.76	87.84	99.84	111.80	141.08	158.40	175.70	129.12	144.44	159.72
51	67.90	79.20	90.50	58.56	67.90	77.20	110.48	125.80	141.08	87.84	99.84	111.80	146.42	165.04	183.68	131.78	147.10	162.38
52	67.90	79.20	90.50	58.56	67.90	77.20	113.14	128.46	143.74	90.50	102.50	114.46	151.74	170.36	189.00	135.76	151.74	167.70
53	69.22	81.20	93.18	59.90	69.90	79.86	117.12	133.10	149.08	95.84	109.14	122.46	155.74	175.04	194.32	138.42	154.40	170.36
54	69.22	81.20	93.18	59.90	69.90	79.86	121.14	137.76	154.40	101.16	114.46	127.78	158.40	177.70	196.98	142.42	159.06	175.70
55	74.54	87.84	101.16	63.88	74.54	85.18	127.78	145.10	162.38	105.16	119.14	133.10	162.38	182.36	202.32	151.74	169.04	186.34
56	79.86	93.18	106.48	66.56	77.20	87.84	135.76	154.40	173.04	111.80	126.46	141.08	171.72	192.34	212.96	159.72	178.36	196.98
57	86.52	100.50	114.46	70.56	81.86	93.18	142.42	161.72	181.02	118.48	133.78	149.08	183.68	204.98	226.28	169.04	188.34	207.64
58	93.18	107.82	122.46	77.20	89.18	101.16	154.40	174.38	194.32	130.44	146.42	162.38	198.34	220.28	242.24	181.02	201.00	220.94
59	97.18	112.48	127.78	85.18	98.50	111.80	161.06	181.70	202.32	137.10	153.74	170.36	208.98	232.28	255.56	190.34	210.98	231.60
60	106.48	122.46	138.42	89.18	103.16	117.12	170.36	191.66	212.96	149.08	166.38	183.68	223.60	247.56	271.52	202.32	223.60	244.90
61	111.80	127.78	143.74	91.86	105.82	119.80	179.70	201.66	223.60	157.06	175.70	194.32	232.94	257.56	282.18	211.64	233.60	255.56
62	115.80	132.44	149.08	98.50	113.14	127.78	187.68	210.98	234.26	163.72	183.02	202.32	242.24	267.54	292.82	224.96	248.24	271.52
63	122.46	139.76	157.06	105.16	120.48	135.76	196.98	220.94	244.90	175.70	195.66	215.62	256.90	282.86	308.80	234.26	258.22	282.18
64	133.10	151.74	170.36	109.14	125.12	141.08	206.32	230.94	255.56	182.36	203.00	223.60	268.86	295.48	322.10	246.24	270.86	295.48
65	139.76	159.06	178.36	115.80	132.44	149.08	216.96	242.92	268.86	193.00	214.96	236.92	283.52	312.14	340.74	255.56	280.86	306.14
66	161.06	181.70	202.32	135.76	154.40	173.04	246.24	274.86	303.46	223.60	247.56	271.52	322.10	352.72	383.32	283.52	310.80	338.08
67	185.02	208.32	231.60	157.06	177.04	196.98	279.52	310.14	340.74	254.24	280.20	306.14	360.72	394.66	428.58	314.12	344.74	375.34
68	206.32	230.94	255.56	173.04	194.32	215.62	310.14	342.74	375.34	283.52	312.14	340.74	399.30	435.24	471.18	347.40	380.00	412.62
69	228.94	255.56	282.18	196.98	220.94	244.90	339.42	374.68	409.94	312.80	342.74	372.68	440.58	479.84	519.10	378.00	413.96	449.88
70	250.22	279.52	308.80	218.28	243.58	268.86	372.68	409.94	447.22	343.40	375.34	407.28	476.50	517.78	559.02	411.30	450.56	489.80
71	271.52	302.14	332.76	236.92	263.54	290.16	404.62	444.56	484.48	375.34	409.94	444.56	517.78	562.36	606.94	441.90	483.16	524.42
72	294.16	326.76	359.38	260.88	290.16	319.44	432.58	474.52	516.42	401.96	437.92	473.84	556.36	602.96	649.52	472.52	517.12	561.68
73	316.78	351.38	386.00	279.52	310.14	340.74	464.54	509.12	553.70	436.56	475.18	513.76	594.96	644.88	694.78	503.12	549.72	596.28
74	339.42	376.02	412.62	300.80	332.76	364.70	497.80	544.40	590.96	464.54	505.12	545.72	633.56	685.48	737.38	533.74	583.66	633.56
75	366.04	405.30	444.56	322.10	356.70	391.32	531.08	581.00	630.90	495.14	537.72	580.32	677.50	732.74	787.96	568.34	620.92	673.48
76	411.30	453.22	495.14	367.36	404.62	441.90	592.30	646.20	700.10	556.36	602.96	649.52	740.04	799.94	859.82	630.90	688.14	745.36
77	457.86	503.12	548.38	413.96	454.54	495.14	652.20	709.44	766.66	617.58	668.16	718.74	805.26	869.82	934.36	696.12	758.02	819.90
78	503.12	551.04	598.96	460.52	504.46	548.38	717.42	779.30	841.20	682.82	738.06	793.28	870.48	939.68	999.98	761.34	827.88	894.44
79	553.70	605.62	657.52	509.78	557.04	604.28	781.30	847.20	913.06	746.70	805.92	865.16	934.36	999.98	999.98	823.90	895.12	966.30

EXHIBIT XIII

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

4 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible						Deductible						Deductible					
	20 days			90 days			20 days			90 days			20 days			90 days		
	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage
	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%
40	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
41	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
42	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
43	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
44	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
45	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
46	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
47	50.58	58.56	66.56	35.94	41.94	47.92	77.20	87.84	98.50	61.22	70.56	79.86	119.80	133.10	146.42	101.16	111.80	122.46
48	51.92	60.56	69.22	37.26	43.94	50.58	78.54	89.84	101.16	63.88	73.22	82.52	121.14	135.10	149.08	105.16	116.46	127.78
49	54.58	63.22	71.88	39.94	46.60	53.24	81.20	92.52	103.82	65.24	75.22	85.18	123.80	137.76	151.74	105.16	116.46	127.78
50	55.90	65.24	74.54	42.60	50.58	58.56	85.18	97.18	109.14	67.90	77.88	87.84	127.78	142.42	157.06	109.14	121.14	133.10
51	55.90	65.24	74.54	42.60	50.58	58.56	85.18	97.18	109.14	67.90	77.88	87.84	127.78	142.42	157.06	109.14	121.14	133.10
52	58.56	67.90	77.20	47.92	55.90	63.88	87.84	99.84	111.80	69.22	79.86	90.50	130.44	145.10	159.72	109.14	121.14	133.10
53	59.90	69.90	79.86	49.26	57.90	66.56	90.50	103.82	117.12	74.54	85.18	95.84	131.78	147.10	162.38	114.46	127.78	141.08
54	59.90	69.90	79.86	49.26	57.90	66.56	93.18	106.48	119.80	74.54	85.18	95.84	134.44	149.76	165.04	114.46	127.78	141.08
55	63.88	74.54	85.18	53.24	62.56	71.88	97.18	111.14	125.12	78.54	89.84	101.16	138.42	154.40	170.36	121.14	135.10	149.08
56	66.56	77.20	87.84	55.90	65.24	74.54	106.48	121.14	135.76	85.18	97.18	109.14	147.76	164.38	181.02	127.78	142.42	157.06
57	70.56	81.86	93.18	59.90	69.90	79.86	113.14	128.46	143.74	93.18	106.48	119.80	154.40	171.72	189.00	134.44	149.76	165.04
58	77.20	89.18	101.16	63.88	74.54	85.18	119.80	135.76	151.74	102.50	116.46	130.44	166.38	185.68	204.98	141.08	157.06	173.04
59	85.18	98.50	111.80	67.90	79.20	90.50	129.12	145.76	162.38	109.14	123.80	138.42	175.70	195.66	215.62	154.40	171.72	189.00
60	89.18	103.16	117.12	77.20	89.18	101.16	138.42	157.06	175.70	119.80	135.76	151.74	186.34	207.64	228.94	162.38	181.02	199.66
61	93.18	107.82	122.46	79.86	91.86	103.82	145.10	164.38	183.68	129.12	145.76	162.38	193.00	214.96	236.92	169.04	188.34	207.64
62	99.84	115.14	130.44	85.18	98.50	111.80	154.40	174.38	194.32	135.76	153.08	170.36	203.66	226.96	250.22	182.36	203.00	223.60
63	106.48	122.46	138.42	89.18	103.16	117.12	161.06	181.70	202.32	143.74	162.38	181.02	214.30	238.92	263.54	189.00	210.30	231.60
64	110.48	127.12	143.74	93.18	107.82	122.46	167.70	189.00	210.30	153.08	172.38	191.66	220.94	246.24	271.52	198.34	220.28	242.24
65	117.12	134.44	151.74	99.84	115.14	130.44	182.36	205.66	228.94	163.72	184.36	204.98	234.26	260.88	287.50	210.30	234.26	258.22
66	137.10	156.40	175.70	115.80	132.44	149.08	206.32	230.94	255.56	185.02	206.98	228.94	263.54	292.82	322.10	235.60	261.56	287.50
67	157.06	178.36	199.66	135.76	154.40	173.04	231.60	258.22	284.84	211.64	236.26	260.88	294.16	325.44	356.70	264.88	293.50	322.10
68	174.38	197.68	220.94	154.40	174.38	194.32	260.88	290.16	319.44	235.60	261.56	287.50	328.76	362.72	396.64	292.82	323.44	354.04
69	194.32	219.62	244.90	167.70	189.00	210.30	286.18	317.46	348.72	259.56	288.18	316.78	360.72	397.32	433.90	326.10	360.06	393.98
70	214.30	241.58	268.86	189.00	212.96	236.92	315.46	349.40	383.32	284.84	315.46	346.06	392.66	431.92	471.18	354.04	390.00	425.92
71	234.26	263.54	292.82	207.64	232.94	258.22	340.74	376.68	412.62	308.80	340.74	372.68	423.26	464.54	505.78	380.66	419.28	457.86
72	251.58	282.86	314.12	220.94	247.56	274.18	367.36	405.96	444.56	332.76	367.36	401.96	456.54	501.14	545.72	409.94	451.22	492.48
73	270.20	302.80	335.42	240.92	269.54	298.14	395.32	435.90	476.50	356.70	392.66	428.58	487.14	533.74	580.32	439.24	483.16	527.08
74	291.50	326.76	362.04	259.56	289.50	319.44	423.26	465.86	508.44	383.32	421.94	460.52	521.76	571.02	620.24	467.20	513.10	559.02
75	314.12	351.38	388.66	279.52	311.46	343.40	452.54	497.80	543.04	408.62	449.22	489.80	553.70	605.62	657.52	500.46	549.72	598.96
76	358.06	398.64	439.24	320.78	356.04	391.32	500.46	549.72	598.96	456.54	501.14	545.72	602.96	659.52	716.08	549.72	603.62	657.52
77	399.30	443.24	487.14	364.70	403.30	441.90	549.72	602.30	654.86	505.78	553.70	601.62	652.20	713.42	774.64	597.64	655.54	713.42
78	444.56	491.16	537.72	409.94	451.22	492.48	601.62	658.86	716.08	557.70	610.28	662.84	704.12	770.00	835.86	649.52	712.10	774.64
79	489.80	540.38	590.96	455.20	500.46	545.72	652.20	713.42	774.64	608.28	664.84	721.40	753.34	823.90	894.44	698.78	766.00	833.20
80				500.46	548.38					660.18	721.40					750.68	822.56	
81				544.40	595.62					713.42	778.64					799.94	876.48	
82				592.30	647.54					765.34	835.20					851.84	933.04	
83				640.22	699.44					817.24	891.78					903.76	989.60	
84				684.14	746.70					867.82	946.36					955.66	999.98	

EXHIBIT XIII

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

2 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible			Deductible			Deductible			Deductible			Deductible			Deductible		
	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days
	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage
40	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
41	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
42	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
43	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
44	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
45	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
46	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
47	35.94	41.94	47.92	27.96	32.62	37.26	59.90	68.56	77.20	47.92	54.58	61.22	85.18	95.84	106.48	70.56	79.20	87.84
48	37.26	43.94	50.58	29.28	34.60	39.94	61.22	70.56	79.86	50.58	58.56	66.56	85.18	95.84	106.48	74.54	83.86	93.18
49	37.26	43.94	50.58	29.28	34.60	39.94	63.88	73.22	82.52	53.24	61.22	69.22	89.18	100.50	111.80	74.54	83.86	93.18
50	42.60	50.58	58.56	33.28	39.28	45.26	67.90	77.88	87.84	57.24	65.90	74.54	89.18	100.50	111.80	78.54	88.52	98.50
51	42.60	50.58	58.56	33.28	39.28	45.26	67.90	77.88	87.84	57.24	65.90	74.54	93.18	105.16	117.12	81.20	91.20	101.16
52	42.60	50.58	58.56	33.28	39.28	45.26	73.22	83.20	93.18	59.90	68.56	77.20	93.18	105.16	117.12	81.20	91.20	101.16
53	43.94	52.58	61.22	34.60	41.28	47.92	74.54	85.18	95.84	61.22	70.56	79.86	101.16	114.46	127.78	85.18	95.84	106.48
54	43.94	52.58	61.22	34.60	41.28	47.92	77.20	87.84	98.50	63.88	73.22	82.52	101.16	114.46	127.78	87.84	98.50	109.14
55	50.58	59.90	69.22	39.94	47.92	55.90	81.20	92.52	103.82	67.90	77.88	87.84	105.16	119.14	133.10	91.86	103.16	114.46
56	53.24	62.56	71.88	39.94	47.92	55.90	83.86	95.18	106.48	73.22	83.20	93.18	109.14	123.80	138.42	98.50	110.48	122.46
57	57.24	67.24	77.20	43.94	52.58	61.22	90.50	102.50	114.46	79.86	90.50	101.16	115.80	131.12	146.42	103.82	117.12	130.44
58	61.22	71.88	82.52	50.58	59.90	69.22	95.84	109.14	122.46	83.86	95.18	106.48	125.12	141.08	157.06	110.48	124.46	138.42
59	65.24	76.54	87.84	53.24	62.56	71.88	105.16	119.14	133.10	90.50	102.50	114.46	131.78	148.42	165.04	114.46	129.12	143.74
60	71.88	83.86	95.84	57.24	67.24	77.20	109.14	123.80	138.42	95.84	109.14	122.46	138.42	155.74	173.04	123.80	139.10	154.40
61	77.20	89.18	101.16	61.22	71.88	82.52	115.80	131.12	146.42	105.16	119.14	133.10	146.42	165.04	183.68	127.78	143.74	159.72
62	82.52	95.84	109.14	63.88	74.54	85.18	119.80	135.76	151.74	109.14	123.80	138.42	155.74	175.04	194.32	131.78	148.42	165.04
63	86.52	100.50	114.46	67.90	79.20	90.50	129.12	145.76	162.38	115.80	131.12	146.42	162.38	182.36	202.32	138.42	155.74	173.04
64	90.50	105.16	119.80	71.88	83.86	95.84	133.10	150.42	167.70	119.80	135.76	151.74	169.04	189.68	210.30	143.74	162.38	181.02
65	97.18	112.48	127.78	79.86	93.18	106.48	141.08	159.72	178.36	129.12	145.76	162.38	178.36	199.66	220.94	153.08	172.38	191.66
66	110.48	127.12	143.74	90.50	105.16	119.80	157.06	177.04	196.98	141.08	159.72	178.36	201.00	224.30	247.56	166.38	187.02	207.64
67	122.46	141.08	159.72	101.16	117.12	133.10	170.36	191.66	212.96	154.40	174.38	194.32	219.62	244.24	268.86	182.36	204.32	226.28
68	138.42	158.40	178.36	114.46	131.78	149.08	189.00	212.96	236.92	165.04	186.34	207.64	242.24	268.86	295.48	198.34	222.94	247.56
69	149.08	170.36	191.66	126.46	145.76	165.04	204.98	230.28	255.56	177.04	200.34	223.60	264.88	293.50	322.10	214.30	240.26	266.20
70	167.70	191.66	215.62	139.76	160.40	181.02	222.28	249.56	276.84	190.34	214.96	239.58	287.50	318.12	348.72	232.94	261.56	290.16
71	178.36	203.66	228.94	150.42	172.38	194.32	239.58	268.86	298.14	201.00	226.96	252.90	308.80	340.74	372.68	246.24	276.18	306.14
72	191.66	218.28	244.90	165.04	189.00	212.96	252.90	283.52	314.12	214.30	241.58	268.86	331.44	365.38	399.30	262.22	293.50	324.76
73	206.32	234.94	263.54	175.70	201.00	226.28	270.20	302.80	335.42	226.28	255.56	284.84	354.04	390.00	425.92	278.20	312.14	346.06
74	219.62	249.56	279.52	189.00	215.62	242.24	287.50	322.10	356.70	239.58	270.20	300.80	375.34	412.62	449.88	294.16	329.42	364.70
75	234.26	266.20	298.14	203.66	232.28	260.88	304.82	341.42	378.00	250.22	282.18	314.12	399.30	439.24	479.16	314.12	351.38	388.66
76	267.54	302.80	338.08	232.94	264.22	295.48	332.76	372.68	412.62	278.20	313.46	348.72	431.24	473.84	516.42	347.40	388.00	428.58
77	300.80	339.42	378.00	268.86	303.46	338.08	364.70	407.28	449.88	308.80	347.40	386.00	464.54	510.44	556.36	380.66	424.60	468.52
78	334.10	376.02	417.94	303.46	342.08	380.66	392.66	438.58	484.48	335.42	376.68	417.94	500.46	549.72	598.96	415.28	461.86	508.44
79	367.36	412.62	457.86	332.76	374.02	415.28	424.60	474.52	524.42	370.02	415.28	460.52	532.40	584.32	636.22	448.56	498.48	548.38
80				370.02	415.28					396.64	444.56					480.50	533.08	
81				401.96	449.88					427.26	478.50					516.42	572.34	
82				436.56	488.48					459.20	514.44					549.72	608.94	
83				473.84	529.74					491.16	550.38					584.32	646.20	
84				508.44	568.34					524.42	586.98					617.58	682.82	

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Policy form 30160A-VA, subject to endorsement form 32100, is an individual policy form providing benefits to individuals for confinement in a nursing home with home care services. This form was issued in Virginia from July 15, 2000 to June 15, 2003.

**1. Purpose of Filing**

This actuarial memorandum has been prepared for the purpose of demonstrating that the anticipated loss ratio standard of this product meets the minimum requirements of your state and may not be suitable for other purposes.

**2. Description of Benefits**

This is a federally tax qualified, individually underwritten policy form that provides comprehensive long term care coverage. Benefits are payable for nursing home and assisted living facility (ALF) care, home and community care, adult day care, respite care, caregiver training, and case management services. Equipment purchase benefits are also included with a lifetime maximum of 50 times the home and community care daily maximum benefit amount. Benefits may be payable for other supplies and services if they are specified in an alternate plan of care agreed to by the insured, the insured's physician and RiverSource Life Insurance Company ("RiverSource Life").

This policy reimburses expenses incurred by the insured subject to the amount of coverage purchased. The facility care daily maximum benefit (FCDMB) is elected by the proposed insured at the time of application. This facility care daily maximum benefit amount is applied to nursing home, ALF, bed reservation, respite care, and alternative plan of care benefits. The home and community care daily maximum benefit amount is also elected by the proposed insured at the time of application and is a percentage (50%, 75%, or 100%) of the facility care daily maximum benefit amount. The home and community care daily maximum benefit amount is applied to home care and adult day care.

A lifetime maximum benefit amount is also elected at the time of application. This establishes the maximum amount that will be paid under the policy for the combined total of all benefit payments. The choices are 730 x FCDMB, 1,460 x FCDMB, 2,190 x FCDMB, and unlimited.

***INFLATION PROTECTION***

At the time of application the proposed insured can elect no benefit increase, the simple benefit increase option, or the compound benefit increase option. The simple benefit increase option will increase the daily maximum amounts (both facility and home and community care amounts) by 5% of the original daily maximum amount each year starting with the second policy year and continuing for the life of the policy, while the compound benefit increase option will increase the previous year's daily maximum amounts (both the facility and home and community care amounts) by 5% each year starting with the second policy year and continuing for the life of the policy. The increasing benefits apply even when the policy is in claim status. Also, the remaining lifetime maximum benefit amount, before the increase, will increase each policy year by the same percentage that the facility care daily maximum benefit amount increases.

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When the total amount paid under a policy is equal to the current lifetime maximum benefit amount, the policy is terminated.

***DEDUCTIBLE PERIOD***

Benefit payments commence after a deductible period of 20 or 90 days of service, depending on the plan initially chosen. Satisfaction of the deductible period begins with the first day on which benefit eligibility is established and expenses are incurred for which payment would be made if there were no deductible period. Only days in which services are used are credited toward satisfaction of the deductible period. These days do not need to be consecutive, but they must occur within a continuous period of three times the number of days in the deductible period. Only one deductible period needs to be satisfied during the lifetime of the policy.

The deductible period applies to all policy benefits except caregiver training, case management, equipment purchase, and respite care. Days for which the only expenses incurred are expenses that are not subject to the deductible period will not be used to satisfy the deductible period.

***BENEFIT ELIGIBILITY AND CONDITIONS***

A licensed health care practitioner must certify the following eligibility conditions at least annually. Benefit eligibility is based on the following: (a) the insured being unable to perform at least 2 or more of the following 6 activities of daily living (ADLs): (1) eating, (2) toileting, (3) transferring, (4) dressing, (5) continence, and (6) bathing, without substantial assistance for a period of at least 90 days due to a loss of functional capacity, or (b) severe cognitive impairment requiring substantial supervision, or (c) the insured having a level of disability similar to that described in (a) above, based on standards established by the Secretary of the Treasury.

A Medicare non-duplication provision excludes benefits that otherwise would be paid but for the application of a Medicare deductible or coinsurance amount.

***FACILITY CARE BENEFITS***

Facility care benefits are payable for nursing home confinement, whether skilled, intermediate, or custodial levels of care are received. Hospital confinement is not a prerequisite for benefit entitlement. Once benefit eligibility is established and the deductible period is satisfied, expenses incurred as a resident inpatient in a nursing home will be reimbursed up to the facility care daily maximum benefit amount that applies on the day expenses are incurred.

Facility care benefits are also payable for stays in a qualified ALF. A qualified ALF is one that has a minimum of 8 inpatients and has a 24-hour awake, trained, and ready to respond staff. Once benefit eligibility is established and the deductible period is satisfied, expenses incurred as a resident inpatient in an ALF will be reimbursed up to the facility care daily maximum benefit amount that applies on the day expenses are incurred.

Premium payments will be waived during extended nursing home and ALF stays. This waiver begins after 90 days of confinement (including during the deductible period) in a nursing home or ALF. These days do not need to be consecutive, but they must occur

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within a continuous period of 180 days. The waiver stops once nursing home and ALF benefits cease.

If a temporary hospitalization is required during a period of confinement in a nursing home or ALF and there is a charge to reserve a bed in the facility, this policy will pay the facility care daily maximum benefit amount for up to 21 days per policy year. These days also count towards satisfying the deductible period.

*HOME CARE BENEFITS*

Home care benefits covered at 100% of the home and community care daily maximum benefit amount are services provided by a nurse, a licensed physical, occupational or speech therapist, a home health aide, a personal care attendant, and adult day care. Home care benefits covered at 80% of the home and community care daily maximum benefit amount are homemaker and chore services. These expenses will be reimbursed subject to the percent of the home and community care daily maximum benefit amount listed above on the day expenses are incurred.

Premium payments will be reimbursed on a month-to-month basis during extended periods of home and community care. This premium waiver begins after expenses for home and community care services, excluding homemaker and chore services, have been incurred for 90 days. The expenses may be incurred while the deductible period is being satisfied or policy benefits are being received. These days do not need to be consecutive, but they must occur within a continuous period of 270 days. The premiums will continue to be reimbursed for each month in which at least 12 days of home and community care services, excluding homemaker and chore services, are received.

*ADDITIONAL BENEFITS*

Benefits in this section do not count against either the facility or home and community care daily maximum benefit amounts. They are, however, deducted from the lifetime maximum benefit amount, except for certain case management services described below. These expenses are not subject to the deductible period and they may not be used to satisfy the deductible period.

Expenses incurred for the first 14 days of respite care received during a policy year will be reimbursed subject to the facility care daily maximum benefit amount that applies on the day expenses are incurred.

Pre-approved equipment purchase expenses will be reimbursed up to a lifetime maximum of 50 times the home and community care daily maximum benefit amount. This equipment must be expected to help the insured remain in their home for at least 90 days.

Caregiver training expenses will be reimbursed up to a lifetime maximum of 5 times the home and community care daily maximum benefit amount.

The initial assessment fee for case management services is reimbursable, but to the extent it exceeds 5 times the facility care daily maximum benefit amount, it will be deducted from the lifetime maximum benefit amount. Other fees charged for case

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management services are reimbursable, but to the extent they exceed 2 times the facility care daily maximum benefit amount per use, they are deducted from the lifetime maximum benefit amount.

***NONFORFEITURE BENEFIT RIDER***

At issue, the insured has the option to select a nonforfeiture benefit rider. The nonforfeiture benefit rider provides a reduced lifetime maximum benefit amount upon lapse. The facility and home and community care daily maximum benefit amounts will continue at the same level as of the date of lapse, regardless of whether a benefit increase option was selected by the insured at issue.

The nonforfeiture benefit will begin if the policy terminates due to nonpayment of premium after the policy and rider have been in force for at least 3 years. The reduced lifetime maximum benefit amount is determined as the sum of all premiums paid at the time of lapse, including the premiums for the nonforfeiture benefit rider. The reduced lifetime maximum benefit amount will not be less than 30 times the facility care daily maximum benefit amount at the time of lapse. However, in no case will the sum of the benefits paid during the premium paying period and the reduced lifetime maximum benefit amount exceed the lifetime maximum benefit amount at time of lapse.

The provisions for the benefit are at least as favorable as those prescribed by the 1996 NAIC Model Regulation.

**3. Renewability**

This policy form is guaranteed renewable for life.

**4. Applicability**

This filing is applicable to inforce policies issued with endorsement form 32100 only, as this policy form is no longer being sold in the market.

**5. Actuarial Assumptions**

Exhibit I provides a comparison of the original pricing assumptions and the current assumptions used in this filing for mortality, lapses, morbidity and interest.

Exhibits II, III, IV and V provide experience analysis summaries for morbidity, mortality and lapse in support of the current rate increase assumptions.

The following discussion describes the actuarial assumptions used in the current rate increase analysis and summarizes our experience analysis in support of these current rate increase assumptions as well as the company's management of this block of business. We believe the current assumptions are justified by the underlying experience and that the changed assumptions from original pricing (and the prior rate increase filings) are reasonable. The current assumptions do not include any provision for profit or contingencies.

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### Morbidity

Expected claim costs are the product of original pricing expected claim costs and an actual-to-expected adjustment factor.

Starting in 1989, RiverSource Life marketed nursing home policies with a zero day prior hospitalization requirement. Using the emerging experience on this business, statistics from the "1985 National Nursing Home Survey" published by the National Center for Health Statistics, and input provided from RiverSource Life's reinsurer, the expected frequencies and severities of claims were developed for nursing home benefits. Incidence rates by issue age and duration were developed to reflect the effects of underwriting on nursing home claims incidence. It was understood that the underwriting process would include an assessment of functional and cognitive abilities if considered appropriate.

Starting in 1990, RiverSource Life also marketed home health care benefit riders. At the time of original pricing, only limited insured experience was available for home and community care benefits. Therefore the expected claim costs for these benefits were derived from general population data with the assistance of RiverSource Life's reinsurer. Both the incidence rates and the length of home care usage for the first two years were determined through analysis of the "1982-1984 National Long Term Care Surveys", which polled elderly people who manifested impairments in ADLs. The home care incidence rates were modified by loading for cognitive impairment as a benefit trigger.

The data from the "1985 National Nursing Home Survey" was used to extrapolate the length of home care usage after the first two years. Additionally, experience data from continuing care retirement communities was used to verify the claim cost assumptions and to provide guidance in translating general population experience to anticipated insured population experience. Incidence rates by issue age and duration were developed to reflect the effects of underwriting on home care claims incidence.

Claim costs for the Benefit Increase Options were based on these claim costs with the benefit loaded to reflect the scheduled increases in benefits. The nonforfeiture benefit claim costs were determined by assumptions consistent with those used in establishing premium rates. The above described experience was also used to determine marital discounts.

It should be recognized that considerable judgment was made with respect to expected claim costs, especially for non-institutional benefits. After using all available data, total expected claim costs were developed that represented reasonable estimates of aggregate long term care experience under the applicable underwriting criteria.

Actual-to-expected adjustment factors have been developed from actual emerging experience through anniversaries ending December 2011 and are shown in the following tables:

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**Lifetime Benefit Actual-to-Expected Adjustment Factors**

Duration	Age at Issue						
	<53	53-57	58-62	63-67	68-72	73-77	78+
1	0.10	0.35	0.35	0.40	0.45	1.20	1.70
2	0.10	0.35	0.35	0.45	0.50	1.25	1.70
3	0.10	0.35	0.35	0.45	0.60	1.25	1.70
4	0.10	0.35	0.35	0.95	0.80	1.30	1.70
5	0.10	0.35	0.35	0.95	0.90	1.30	1.70
6	0.10	0.35	0.35	0.95	1.00	1.35	1.70
7	0.15	0.35	0.40	0.95	1.15	1.40	1.70
8	0.15	0.35	0.50	0.90	1.15	1.35	1.70
9	0.15	0.35	0.60	0.95	1.15	1.45	1.70
10	0.15	0.35	0.60	0.95	1.15	1.50	1.70
11	0.15	0.35	0.65	0.95	1.15	1.50	1.70
12	0.25	0.40	0.65	0.95	1.15	1.50	1.70
13	0.30	0.45	0.70	1.00	1.15	1.50	1.70
14	0.30	0.50	0.75	1.00	1.15	1.50	1.70
15	0.30	0.50	0.75	1.00	1.15	1.50	1.70
16	0.30	0.55	0.75	1.00	1.15	1.50	1.70
17	0.35	0.60	0.80	1.05	1.15	1.50	1.70
18	0.35	0.65	0.80	1.05	1.15	1.50	1.70
19	0.35	0.70	0.80	1.05	1.15	1.60	1.70
20	0.45	0.75	0.85	1.05	1.15	1.60	1.70
21	0.50	0.80	0.85	1.05	1.15	1.60	1.80
22	0.55	0.85	0.85	1.05	1.15	1.70	1.80
23	0.60	0.85	0.90	1.05	1.15	1.70	1.80
24	0.65	0.85	0.90	1.05	1.15	1.70	1.90
25	0.70	0.85	0.90	1.05	1.15	2.00	1.90
26	0.75	0.85	0.95	1.05	1.15	2.00	1.90
27	0.80	0.85	0.95	1.05	1.15	2.10	2.00
28	0.80	0.85	1.00	1.05	1.15	2.10	2.00
29	0.90	0.90	1.00	1.05	1.15	2.10	2.00
30	0.90	0.95	1.05	1.05	1.15	2.10	2.00
31	0.90	0.98	1.08	1.05	1.15	2.10	2.03
32	0.94	0.98	1.08	1.05	1.15	2.10	2.03
33	0.94	0.98	1.08	1.05	1.15	2.10	2.03
34	1.00	0.98	1.08	1.05	1.15	2.10	2.03
35+	1.00	1.00	1.10	1.05	1.15	2.10	2.05

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**Non-Lifetime Benefit Actual-to-Expected Adjustment Factors**

Duration	Age at Issue								
	<48	48-52	53-57	58-62	63-67	68-72	73-77	78-82	83+
1	0.10	0.10	0.10	0.20	0.20	0.45	0.65	0.70	1.50
2	0.10	0.10	0.10	0.25	0.30	0.45	0.85	0.90	1.60
3	0.15	0.15	0.15	0.30	0.35	0.55	1.05	0.90	1.70
4	0.20	0.20	0.20	0.40	0.35	0.80	1.15	1.10	2.15
5	0.25	0.25	0.25	0.45	0.45	0.80	1.40	1.40	2.15
6	0.30	0.30	0.35	0.50	0.60	1.00	1.40	1.85	2.15
7	0.30	0.30	0.40	0.55	0.75	1.05	1.45	2.05	2.15
8	0.30	0.30	0.45	0.60	0.85	1.15	1.55	2.30	2.15
9	0.35	0.35	0.55	0.75	0.95	1.20	1.70	2.60	2.20
10	0.40	0.40	0.55	0.80	1.00	1.25	1.70	2.60	2.20
11	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
12	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
13	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
14	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
15	0.45	0.45	0.55	0.95	1.05	1.25	1.75	2.65	2.20
16	0.45	0.45	0.55	0.95	1.05	1.25	1.75	2.65	2.20
17	0.50	0.50	0.60	0.95	1.05	1.25	1.75	2.65	2.20
18	0.50	0.50	0.65	0.95	1.05	1.25	1.75	2.65	2.20
19	0.55	0.55	0.70	0.95	1.05	1.25	1.80	2.65	2.20
20	0.55	0.55	0.80	0.95	1.05	1.25	1.80	2.65	2.20
21	0.60	0.60	0.80	0.95	1.05	1.25	1.80	2.70	2.20
22	0.60	0.60	0.85	0.95	1.05	1.25	1.80	2.70	2.20
23	0.65	0.65	0.85	1.00	1.05	1.25	1.80	2.70	2.20
24	0.65	0.65	0.90	1.00	1.05	1.25	1.90	2.70	2.20
25	0.70	0.70	0.90	1.00	1.05	1.25	1.90	2.70	2.20
26	0.75	0.75	0.95	1.00	1.05	1.25	1.90	2.70	2.20
27	0.80	0.80	0.95	1.00	1.05	1.25	1.90	2.70	2.20
28	0.85	0.85	1.00	1.00	1.05	1.25	1.90	2.70	2.20
29	0.90	0.90	1.00	1.05	1.05	1.25	2.00	2.70	2.20
30	0.90	0.90	1.00	1.05	1.05	1.25	2.00	2.70	2.20
31	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
32	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
33	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
34	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
35+	1.00	1.00	1.00	1.05	1.10	1.25	2.00	2.70	2.20

Beginning in 2003, we have taken steps to improve claim experience by reviewing and tightening claim adjudication and care coordination practices where possible. To reflect these improvements, we have reduced our expected claim costs by 5% for 2004 and later.

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We conduct a morbidity study every year to analyze the current actual-to-expected adjustment factors (A/E factors). Our analysis is done on a claim cost basis, rather than on a frequency and severity basis, which is not readily available.

The morbidity study is performed by comparing actual incurred claims to expected incurred claims, where expected claims reflect the original pricing claim costs adjusted with the company's most recent set of A/E factors. If the resulting cumulative actual-to-expected ratio is near 100% while minimizing the squared error, no changes are made to the A/E factors. However, if the actual-to-expected ratio has shifted away from 100% or the squared error is too high, we develop a new set of A/E factors and retest them until a good fit is found (measured by actual-to-expected ratio and squared error).

Exhibit II displays "expected" experience using our current adjustment factors compared to actual incurred claims. The expected basis shown in this exhibit reflects the currently assumed claim costs. As shown in Exhibit II the total actual-to-expected ratio using the A/E factors described above is 101.1%. This experience is based on 1,206 actual claims (378 lifetime and 838 non-lifetime). Actual claim counts split by issue age band are also displayed in Exhibit II.

Professional judgment was applied to create factors for periods beyond that for which there is experience. It has been credibly observed on older forms, including 30160A subject to endorsement form 32100, that experience has been favorable at younger attained ages but much worse than priced for at older attained ages. Thus we believe A/E factors that increase by duration are appropriate.

### Mortality

Durational mortality selection factors were developed from actual experience on all LTC forms combined and are applied to the 1983 Individual Annuitant Mortality (IAM) Basic table.

Exhibit III is based on deaths on all LTC policies incurred from policy anniversaries in 2000 through policy anniversaries in 2011. The expected basis shown in this exhibit reflects 1983 IAM Basic mortality with the currently assumed selection factors. The selection factors fit the observed data very well with the resulting A/E at or near 100%.

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The data, along with the following rules, were used in the development of the current selection factors:

- a. Factors must be non-decreasing by duration;
- b. Round to nearest 5%; and
- c. Maximum of 100%.

Selection factors are assumed to differ by issue age band, since the selection period is expected to be shorter at older issue ages.

At the older issue ages, mortality increases to approximately 100% of the table. In general, that has not been the case through duration 22 for younger issue ages, but we expect that it would as insureds reach a very advanced age. For this reason the effect of selection is extended up to duration 34 for younger issue ages. This experience includes 32,715 deaths.

#### Lapse Rates

Ultimate voluntary termination rates range from 1.1% to 5.4% based on issue age band and benefit category (lifetime and non-lifetime). No additional lapse due to the proposed rate increase is projected. Exhibit IV provides the additional lapses and risk amount reductions experienced by the company at different levels of rate increase.

Exhibit V provides the lapse experience across all LTC forms combined from policy anniversaries in 2000 through policy anniversaries in 2011. The expected basis shown in this exhibit reflects the currently assumed lapse rates.

Lapse experience varies by issue age and benefit type (lifetime benefit versus non-lifetime benefit). We applied judgment to the data contained in this exhibit to derive the best estimate lapse assumption. For later durations, we often looked at several durations' experience together to improve credibility. We also made an effort to reflect that lapse rates seem to increase some at older attained ages. This experience includes 33,760 lapses, including 9,225 in durations 8 and later. The exposure and actual lapses close to the implementation of rate increases are excluded from this analysis. For non-lifetime benefits, lapses include policies that have maximized their benefits.

We have experienced much stronger customer loyalty than anticipated at the time these policy forms were initially priced. The resulting high policy persistency has unfortunately had an adverse impact on loss ratios.

#### Adverse Selection

No adverse selection is projected.

#### Expenses

Expenses have not been explicitly projected. It is assumed that the originally filed expense assumptions remain appropriate, except that commission rates were reduced in 2008 and 2011 so that total commissions paid before and after the prior increases in premium are similar. In addition, as part of this rate increase process, the company

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anticipates adjusting commission rates so that the total commissions paid before and after this increase in premium are similar.

The above assumptions are based on actual inforce experience of RiverSource Life and are deemed reasonable for this particular policy form; they do not include any provision for profit or contingencies.

Exhibit VI provides the assumptions used in the 2007 rate increase filing, and Exhibit VII provides the assumptions used in the 2011 rate increase filing.

**6. Marketing Method**

This policy form was marketed by agents of RiverSource Life.

**7. Underwriting Description**

This policy form was fully underwritten with the use of various underwriting tools in addition to the application, which may have included medical records, an attending physician's statement, telephone interview and/or face-to-face assessment.

**8. Premiums**

Premiums are unisex and payable for life. The premiums vary by issue age, the initial amount of the facility and home and community care daily maximum benefit amounts, the maximum lifetime benefit amount, the deductible period, the Benefit Increase Option, and marital status at issue.

**9. Issue Age Range**

The issue ages are from 40 to 79 except for the benefit structures with 90-day deductible period, 2- or 4-year maximum policy benefit, and home and community care daily maximum 50% or 75% of facility care daily maximum, which are issued to age 84.

**10. Area Factors**

Area factors are not used for this product.

**11. Premium Modalization Rules**

The following modal factors and nationwide percent distributions (based on inforce count as of 3/31/2013) are applied to the annual premium (AP):

<b>Premium Mode</b>	<b>Modal Factors</b>	<b>Percent Distribution</b>
Annual	$1.0000*AP + 0.0$	39.5%
Semi-Annual	$0.5020*AP + 0.4$	6.3%
Quarterly	$0.2580*AP + 0.5$	7.2%

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Monthly	0.0868*AP+ 0.6	47.0%
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**12. Active Life Reserves**

Active life reserves, although they have significant impact, have not been used in this rate increase analysis, except as described in Exhibits X and XI.

**13. Trend Assumptions**

As this is not medical insurance, we have not included any explicit medical cost trends in the projections.

**14. Past and Future Policy Experience**

Nationwide experience for policy form 30160A, subject to endorsement form 32100, is shown in Exhibit VIII, and Virginia experience for policy form 30160A-VA, subject to endorsement form 32100, is shown in Exhibit IX. Exhibit X shows nationwide past experience including earned premiums, incurred claims, increase in active life reserves and incurred loss ratios by calendar year, and Exhibit XI shows corresponding Virginia experience. These exhibits include any previously implemented rate increases as described in Section 15 of this memorandum.

Please note that RiverSource Life does not consider Virginia-specific experience as fully credible but is providing it as required. The proposed rates have been developed using nationwide experience.

Historical experience is shown by claim incurral year with the loss ratio for each calendar year. The following formula provides an illustration of the historical incurred loss ratio calculation for each calendar year:

$$ILR_j = \frac{\sum_k \sum_t {}_j Pmt_t^k * v^{t-k} + \sum_k ({}_j CR_{ValDate}^k + {}_j IBNR_{ValDate}^k) * v^{ValDate-k}}{EP_j}$$

$ILR_j$  = incurred loss ratio for year  $j$

${}_j Pmt_t^k$  = claim payments at time  $t$  on claims incurred at time  $k$  in year  $j$

${}_j CR_{ValDate}^k$  = open claim reserve held on March 31, 2013 for claims incurred at time  $k$  in year  $j$

${}_j IBNR_{ValDate}^k$  = incurred but not reported reserve as of March 31, 2013 attributable to claims incurred at time  $k$  in year  $j$

$EP_j$  = earned premium in year  $j$

$ValDate$  = March 31, 2013

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$j$  = year of claim incurral

$k$  = date of claim incurral

$t$  = date of claim payment

$v = 1 / 1.045 = 0.956938$

A historical annual paid loss ratio is calculated, with and without interest, as historical paid claims divided by historical earned premiums, where paid claims are calculated as the actual claims paid in that year. A historical annual incurred loss ratio is calculated, with and without interest, as historical incurred claims divided by historical earned premiums. Actual historical incurred claims used in Exhibits VIII, IX, X and XI are determined by discounting claim payments and open claim reserves to the actual original loss date for each claim and by discounting IBNR to the time it is assumed to occur. Actual historical earned premiums used in Exhibits VIII, IX, X and XI are calculated based on the issue and, if appropriate, termination date for each policy. These items are then summed to produce a total for each calendar year. For purposes of accumulating historical experience for a historical or for a lifetime loss ratio calculation, these calendar year totals are assumed to represent a mid-year value.

A future annual paid loss ratio is calculated, with and without interest, as anticipated paid claims divided by anticipated earned premiums. A future annual incurred loss ratio is calculated, with and without interest, as anticipated incurred claims divided by anticipated earned premiums. The anticipated earned premiums, paid claims and incurred claims are projected on a seriatim basis and then summed to produce a total for each calendar year. For purposes of accumulating experience for an anticipated or for a lifetime loss ratio calculation, these calendar year totals are assumed to represent a mid-year value.

Lifetime loss ratios in Exhibits VIII and IX are as of March 31, 2013 and are calculated as the sum of accumulated historical experience and discounted future experience where accumulation and discounting of the total for each calendar year occur at 5.0%, an interest rate consistent with that assumed in the determination of premiums at the time of original pricing, and assume mid-year values.

The incurred loss ratio in Exhibits X and XI is defined as the sum of incurred claims and increase in active life reserves divided by earned premiums. The values in these exhibits are shown without interest accumulation.

**15. History of Previous Rate Revisions**

Two prior increases have been approved and implemented on this form. A 10% increase was approved in June 2007 and implemented on each contract's next policy anniversary beginning in September 2007. A 10% increase was approved in November 2011 and implemented on each contract's next policy anniversary beginning in March 2012. The actual and projected premiums in Exhibits IX and XI reflect the impact of these increases.

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The actual and projected premiums in Exhibits VIII and X reflect the accumulated rate increases as approved in Virginia and implemented on all policies from 2007 through 2013 on a nationwide basis.

**16. Requested Rate Increase and Demonstration of Satisfaction of Loss Ratio Requirements**

The company is requesting an increase of 10%.

Projected experience assuming this increase is implemented is shown in Exhibits VIII and IX. As shown in these exhibits, the expected lifetime loss ratio with and without the requested rate increase exceeds the minimum loss ratio of 60%.

Current rate tables for this form are included with this memorandum in Exhibit XII, and corresponding rate tables with the requested rate increase are included with this memorandum in Exhibit XIII.

**17. Virginia Average Annual Premium (Annual Premium Based on March 31, 2013 Inforce)**

Before increase:       \$1,690  
After increase:        \$1,859

These values assume all previously approved premium increases have been implemented.

**18. Proposed Effective Date**

This rate increase will apply to policies on their policy anniversary date following a 60-day policyholder notification period.

**19. Nationwide Distribution of Business as of 3/31/2013 (based on inforce count)**

By Issue Age:

<b>Issue Ages</b>	<b>Percent Distribution</b>
<55	37.3%
55-59	27.6%
60-64	20.7%
65-69	9.3%
70-74	3.6%
75-79	1.3%
>79	0.2%

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By Deductible Period:

<b>Deductible Period</b>	<b>Percent Distribution</b>
20-day	19.0%
90-day	81.0%

By Benefit Period:

<b>Benefit Period</b>	<b>Percent Distribution</b>
2-Year	3.0%
4-Year	29.4%
6-Year	30.7%
Unlimited	36.9%

By Inflation Protection Option:

<b>Inflation Option</b>	<b>Percent Distribution</b>
None	6.3%
Simple	35.5%
Compound	58.2%

**20. Number of Policyholders**

As of 3/31/2013, the number of policies and annual premium inforce, assuming all premium increases previously approved in Virginia have been implemented in both the state and nationwide, is:

	<b>Number of Insured</b>	<b>Annual Premium</b>
Virginia	1,647	\$2,784,003
Nationwide	30,369	\$52,522,627

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**21. Actuarial Certification**

I am a Fellow of the Society of Actuaries and a Member of the American Academy of Actuaries, and I meet the Academy's qualification standards for preparing health rate filings and to render the actuarial opinion contained herein.

I believe this rate filing is in compliance with the applicable laws of the State of Virginia and with the rules of the Bureau. This memorandum has been prepared in conformity with all applicable Actuarial Standards of Practice, including ASOP No. 8.

I hereby certify that, to the best of my knowledge and judgment, this rate submission is in compliance with the applicable laws and regulations of the state where it is filed. Furthermore, the actuarial assumptions are appropriate. In my opinion, the rates are not excessive or unfairly discriminatory. The premiums are reasonable in relation to the benefits, as provided in 14 VAC 5-130-70(C).



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Anju Gupta-Lavey, FSA, MAAA  
Actuary  
RiverSource Life Insurance Company  
Date: August 1, 2013

**EXHIBIT I**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Original Pricing Assumptions:**

**Mortality:** 1983 Individual Annuitant Mortality Table

**Lapse Rates:**

Duration	Issue Age				
	45	55	65	75	82
1	10%	9%	8%	7%	6%
2	9%	8%	7%	6%	5%
3	8%	7%	6%	5%	4%
4	7%	6%	5%	4%	3%
5	6%	5%	5%	4%	3%
6+	5%	5%	5%	4%	3%

**Morbidity:**

Starting in 1989, RiverSource Life marketed nursing home policies with a zero day prior hospitalization requirement. Using the emerging experience on this business, statistics from the "1985 National Nursing Home Survey" published by the National Center for Health Statistics, and input provided from RiverSource Life's reinsurer, the expected frequencies and severities of claims were developed for nursing home benefits. Incidence rates by issue age and duration were developed to reflect the effects of underwriting on nursing home claims incidence. It was understood that the underwriting process would include an assessment of functional and cognitive abilities if considered appropriate.

Starting in 1990, RiverSource Life also marketed home health care benefit riders. At the time of original pricing, only limited insured experience was available for home health and community care benefits. Therefore the expected claim costs for these benefits were derived from general population data with the assistance of RiverSource Life's reinsurer. Both the incidence rates and the length of home health care usage for the first two years were determined through analysis of the "1982-1984 National Long Term Care Surveys", which polled elderly people who manifested impairments in ADLs. The home health care incidence rates were modified by loading for cognitive impairment as a benefit trigger.

The data from the "1985 National Nursing Home Survey" was used to extrapolate the length of home health care usage after the first two years. Additionally, experience data from continuing care retirement communities was used to verify the claim cost assumptions and to provide guidance in translating general population experience to anticipated insured population experience. Incidence rates by issue age and duration were developed to reflect the effects of underwriting on home health care claims incidence.

Claim costs for the Benefit Increase Options were based on these claim costs with the benefit loaded to reflect the scheduled increases in benefits. The nonforfeiture benefit claim costs were determined by assumptions consistent with those used in establishing premium rates. The above described experience was also used to determine marital discounts.

It should be recognized that considerable judgment was made with respect to expected claim costs, especially for non-institutional benefits. After using all available data, total expected claim costs were developed that represented reasonable estimates of aggregate long term care experience under the applicable underwriting criteria.

The following selection factors were used:

Duration	Issue Age Band			
	40-59	60-69	70-79	80+
1	40%	35%	30%	20%
2	50%	55%	60%	80%
3	55%	60%	75%	100%
4	60%	65%	90%	100%
5	65%	70%	100%	100%
6	70%	75%	100%	100%
7	75%	80%	100%	100%
8	80%	90%	100%	100%
9	90%	100%	100%	100%
10+	100%	100%	100%	100%

**Interest Rate:** 5.0%

**EXHIBIT I**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Current Assumptions:**

**Mortality:** 1983 Individual Annuitant Mortality Basic Table with selection consistent with experience

**Mortality Selection Factors**

Duration	Issue Age Band					
	<58	58-62	63-67	68-72	73-77	78+
1	20%	20%	25%	20%	20%	25%
2	25%	35%	40%	30%	25%	25%
3	35%	45%	45%	40%	40%	40%
4	40%	50%	45%	45%	45%	45%
5	45%	50%	45%	55%	50%	55%
6	50%	50%	55%	55%	60%	60%
7	50%	55%	60%	60%	65%	65%
8	50%	55%	60%	60%	70%	75%
9	50%	55%	65%	70%	75%	85%
10	60%	65%	70%	75%	75%	85%
11	60%	70%	70%	80%	75%	85%
12	60%	70%	70%	80%	90%	90%
13	60%	70%	75%	85%	90%	95%
14	60%	75%	75%	90%	90%	95%
15	60%	75%	80%	90%	95%	95%
16	75%	75%	80%	90%	95%	100%
17	75%	75%	80%	95%	100%	100%
18	75%	75%	80%	95%	100%	100%
19	75%	80%	80%	95%	100%	100%
20	75%	80%	90%	95%	100%	100%
21	75%	80%	90%	100%	100%	100%
22	80%	85%	90%	100%	100%	100%
23	80%	85%	95%	100%	100%	100%
24	85%	90%	95%	100%	100%	100%
25	90%	90%	100%	100%	100%	100%
26	90%	90%	100%	100%	100%	100%
27	90%	90%	100%	100%	100%	100%
28	90%	95%	100%	100%	100%	100%
29	90%	95%	100%	100%	100%	100%
30	90%	100%	100%	100%	100%	100%
31	90%	100%	100%	100%	100%	100%
32	95%	100%	100%	100%	100%	100%
33	95%	100%	100%	100%	100%	100%
34	95%	100%	100%	100%	100%	100%
35+	100%	100%	100%	100%	100%	100%

**EXHIBIT I**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Current Assumptions (continued):**

**Lapse Rates:**

Duration	Lifetime Benefit			Duration	Non-Lifetime Benefit		
	Issue Age Band				Issue Age Band		
	<63	63-72	73+		<63	63-72	73+
1	6.9%	6.8%	7.0%	1	6.9%	7.1%	5.3%
2	6.5%	4.5%	3.5%	2	6.0%	4.8%	4.6%
3	4.8%	3.5%	3.5%	3	4.2%	3.3%	3.1%
4	3.6%	2.6%	1.9%	4	3.1%	2.9%	2.9%
5	2.6%	1.9%	1.3%	5	2.3%	2.0%	2.2%
6	1.9%	1.6%	1.3%	6	1.7%	1.9%	2.1%
7	1.5%	1.1%	1.3%	7	1.5%	1.6%	2.3%
8	1.1%	1.1%	1.3%	8	1.2%	1.4%	2.5%
9	1.1%	1.1%	1.3%	9	1.2%	1.3%	2.7%
10	0.8%	1.1%	1.3%	10	1.0%	1.3%	3.4%
11	0.7%	0.9%	1.4%	11	1.0%	1.5%	3.9%
12	0.7%	0.9%	1.5%	12	0.9%	1.5%	4.0%
13	0.7%	0.9%	1.5%	13	0.8%	1.5%	4.4%
14	0.7%	0.9%	1.6%	14	0.8%	1.5%	4.8%
15	0.7%	0.9%	1.6%	15	0.7%	1.6%	4.9%
16	0.7%	1.0%	1.7%	16	0.7%	1.8%	5.4%
17	0.7%	1.1%	1.7%	17	0.8%	2.0%	5.4%
18	0.7%	1.2%	1.8%	18	0.8%	2.2%	5.4%
19	0.7%	1.2%	1.8%	19	0.9%	2.4%	5.4%
20	0.8%	1.2%	1.9%	20	0.9%	2.6%	5.4%
21	0.8%	1.3%	1.9%	21	0.9%	2.8%	5.4%
22	0.8%	1.3%	2.0%	22	0.9%	3.0%	5.4%
23	0.8%	1.4%	2.0%	23	1.0%	3.2%	5.4%
24	0.9%	1.4%	2.0%	24	1.2%	3.4%	5.4%
25	0.9%	1.4%	2.0%	25	1.4%	3.6%	5.4%
26	0.9%	1.4%	2.0%	26	1.5%	3.8%	5.4%
27	1.0%	1.4%	2.0%	27	1.6%	4.0%	5.4%
28	1.0%	1.4%	2.0%	28	2.1%	4.0%	5.4%
29	1.0%	1.4%	2.0%	29	2.4%	4.0%	5.4%
30	1.0%	1.4%	2.0%	30	2.6%	4.0%	5.4%
31	1.1%	1.4%	2.0%	31	2.9%	4.0%	5.4%
32	1.1%	1.4%	2.0%	32	3.1%	4.0%	5.4%
33	1.1%	1.4%	2.0%	33	3.2%	4.0%	5.4%
34	1.1%	1.4%	2.0%	34	3.3%	4.0%	5.4%
35	1.1%	1.4%	2.0%	35	3.4%	4.0%	5.4%
36+	1.1%	1.4%	2.0%	36+	3.5%	4.0%	5.4%

**EXHIBIT I**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Current Assumptions (continued):**

**Morbidity:** Expected Claim Costs are the product of original pricing expected claim costs and an actual-to-expected adjustment factor. Actual-to-expected adjustment factors were developed from actual emerging experience through anniversaries ending December 2011. Morbidity used in the projections has also been reduced by 5% for anticipated improved claim experience from changes in claim management starting in 2003.

**Lifetime Benefit Actual-to-Expected Adjustment Factors**

Duration	Age at Issue						
	<53	53-57	58-62	63-67	68-72	73-77	78+
1	0.10	0.35	0.35	0.40	0.45	1.20	1.70
2	0.10	0.35	0.35	0.45	0.50	1.25	1.70
3	0.10	0.35	0.35	0.45	0.60	1.25	1.70
4	0.10	0.35	0.35	0.95	0.80	1.30	1.70
5	0.10	0.35	0.35	0.95	0.90	1.30	1.70
6	0.10	0.35	0.35	0.95	1.00	1.35	1.70
7	0.15	0.35	0.40	0.95	1.15	1.40	1.70
8	0.15	0.35	0.50	0.90	1.15	1.35	1.70
9	0.15	0.35	0.60	0.95	1.15	1.45	1.70
10	0.15	0.35	0.60	0.95	1.15	1.50	1.70
11	0.15	0.35	0.65	0.95	1.15	1.50	1.70
12	0.25	0.40	0.65	0.95	1.15	1.50	1.70
13	0.30	0.45	0.70	1.00	1.15	1.50	1.70
14	0.30	0.50	0.75	1.00	1.15	1.50	1.70
15	0.30	0.50	0.75	1.00	1.15	1.50	1.70
16	0.30	0.55	0.75	1.00	1.15	1.50	1.70
17	0.35	0.60	0.80	1.05	1.15	1.50	1.70
18	0.35	0.65	0.80	1.05	1.15	1.50	1.70
19	0.35	0.70	0.80	1.05	1.15	1.60	1.70
20	0.45	0.75	0.85	1.05	1.15	1.60	1.70
21	0.50	0.80	0.85	1.05	1.15	1.60	1.80
22	0.55	0.85	0.85	1.05	1.15	1.70	1.80
23	0.60	0.85	0.90	1.05	1.15	1.70	1.80
24	0.65	0.85	0.90	1.05	1.15	1.70	1.90
25	0.70	0.85	0.90	1.05	1.15	2.00	1.90
26	0.75	0.85	0.95	1.05	1.15	2.00	1.90
27	0.80	0.85	0.95	1.05	1.15	2.10	2.00
28	0.80	0.85	1.00	1.05	1.15	2.10	2.00
29	0.90	0.90	1.00	1.05	1.15	2.10	2.00
30	0.90	0.95	1.05	1.05	1.15	2.10	2.00
31	0.90	0.98	1.08	1.05	1.15	2.10	2.03
32	0.94	0.98	1.08	1.05	1.15	2.10	2.03
33	0.94	0.98	1.08	1.05	1.15	2.10	2.03
34	1.00	0.98	1.08	1.05	1.15	2.10	2.03
35+	1.00	1.00	1.10	1.05	1.15	2.10	2.05

**EXHIBIT I**  
**RiverSource Life Insurance Company**  
**Original Pricing & Current Assumptions Comparison**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Current Assumptions (continued):**

**Morbidity (continued):**

**Non-Lifetime Benefit Actual-to-Expected Adjustment Factors**

Duration	Age at Issue								
	<48	48-52	53-57	58-62	63-67	68-72	73-77	78-82	83+
1	0.10	0.10	0.10	0.20	0.20	0.45	0.65	0.70	1.50
2	0.10	0.10	0.10	0.25	0.30	0.45	0.85	0.90	1.60
3	0.15	0.15	0.15	0.30	0.35	0.55	1.05	0.90	1.70
4	0.20	0.20	0.20	0.40	0.35	0.80	1.15	1.10	2.15
5	0.25	0.25	0.25	0.45	0.45	0.80	1.40	1.40	2.15
6	0.30	0.30	0.35	0.50	0.60	1.00	1.40	1.85	2.15
7	0.30	0.30	0.40	0.55	0.75	1.05	1.45	2.05	2.15
8	0.30	0.30	0.45	0.60	0.85	1.15	1.55	2.30	2.15
9	0.35	0.35	0.55	0.75	0.95	1.20	1.70	2.60	2.20
10	0.40	0.40	0.55	0.80	1.00	1.25	1.70	2.60	2.20
11	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
12	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
13	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
14	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
15	0.45	0.45	0.55	0.95	1.05	1.25	1.75	2.65	2.20
16	0.45	0.45	0.55	0.95	1.05	1.25	1.75	2.65	2.20
17	0.50	0.50	0.60	0.95	1.05	1.25	1.75	2.65	2.20
18	0.50	0.50	0.65	0.95	1.05	1.25	1.75	2.65	2.20
19	0.55	0.55	0.70	0.95	1.05	1.25	1.80	2.65	2.20
20	0.55	0.55	0.80	0.95	1.05	1.25	1.80	2.65	2.20
21	0.60	0.60	0.80	0.95	1.05	1.25	1.80	2.70	2.20
22	0.60	0.60	0.85	0.95	1.05	1.25	1.80	2.70	2.20
23	0.65	0.65	0.85	1.00	1.05	1.25	1.80	2.70	2.20
24	0.65	0.65	0.90	1.00	1.05	1.25	1.90	2.70	2.20
25	0.70	0.70	0.90	1.00	1.05	1.25	1.90	2.70	2.20
26	0.75	0.75	0.95	1.00	1.05	1.25	1.90	2.70	2.20
27	0.80	0.80	0.95	1.00	1.05	1.25	1.90	2.70	2.20
28	0.85	0.85	1.00	1.00	1.05	1.25	1.90	2.70	2.20
29	0.90	0.90	1.00	1.05	1.05	1.25	2.00	2.70	2.20
30	0.90	0.90	1.00	1.05	1.05	1.25	2.00	2.70	2.20
31	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
32	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
33	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
34	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
35+	1.00	1.00	1.00	1.05	1.10	1.25	2.00	2.70	2.20

**Interest Rate:** 5.0%

**EXHIBIT II**  
**RiverSource Life Insurance Company**  
**Nationwide Long Term Care Claim Experience**  
**Policy Years through 2011**  
**Policy Form: 30160A, Subject to Endorsement 32100**  
**Expected Claims Based on Current Assumptions**

<b>SPLIT BY BENEFIT PERIOD AND DURATION</b>									
<b>Duration</b>	<b>Lifetime Benefit Period</b>			<b>Non-Lifetime Benefit Period</b>			<b>All</b>		
	<b>Actual</b>	<b>Expected</b>	<b>A/E</b>	<b>Actual</b>	<b>Expected</b>	<b>A/E</b>	<b>Actual</b>	<b>Expected</b>	<b>A/E</b>
1	567,897	551,181	103.0%	197,412	502,628	39.3%	765,309	1,053,808	72.6%
2	1,270,967	919,703	138.2%	978,154	1,167,961	83.7%	2,249,122	2,087,663	107.7%
3	510,274	1,136,415	44.9%	2,029,044	1,765,729	114.9%	2,539,318	2,902,145	87.5%
4	3,751,141	1,755,258	213.7%	2,640,754	2,617,393	100.9%	6,391,895	4,372,651	146.2%
5	3,104,482	2,128,256	145.9%	2,770,855	3,635,723	76.2%	5,875,337	5,763,978	101.9%
6	1,980,275	2,618,346	75.6%	6,298,342	4,946,927	127.3%	8,278,617	7,565,273	109.4%
7	4,011,625	3,302,962	121.5%	5,684,023	6,267,141	90.7%	9,695,648	9,570,103	101.3%
8	1,878,936	3,980,642	47.2%	7,332,395	7,927,619	92.5%	9,211,331	11,908,261	77.4%
9	3,959,686	4,699,626	84.3%	10,126,649	9,642,295	105.0%	14,086,335	14,341,921	98.2%
10	3,145,402	3,673,031	85.6%	8,312,445	7,450,457	111.6%	11,457,847	11,123,488	103.0%
11	1,836,590	1,614,481	113.8%	3,887,484	3,178,398	122.3%	5,724,074	4,792,879	119.4%
<b>Total</b>	<b>26,017,276</b>	<b>26,379,901</b>	<b>98.6%</b>	<b>50,257,557</b>	<b>49,102,271</b>	<b>102.4%</b>	<b>76,274,832</b>	<b>75,482,171</b>	<b>101.1%</b>

<b>SPLIT BY ISSUE AGE</b>				
<b>Issue Age</b>	<b>Actual</b>	<b>Expected</b>	<b>A/E</b>	<b>Claim Count</b>
<43	87,977	55,797	157.7%	3
43-47	81,878	325,141	25.2%	6
48-52	1,502,970	1,513,269	99.3%	32
53-57	6,694,374	6,965,730	96.1%	105
58-62	11,915,932	13,077,519	91.1%	225
63-67	16,367,499	16,525,731	99.0%	240
68-72	14,796,144	14,426,852	102.6%	230
73-77	15,576,820	14,432,764	107.9%	238
78-82	8,026,013	7,115,306	112.8%	106
83+	1,225,225	1,044,064	117.4%	21
<b>Total</b>	<b>76,274,832</b>	<b>75,482,171</b>	<b>101.1%</b>	<b>1,206</b>

**EXHIBIT III**  
**RiverSource Life Insurance Company**  
**Long-Term Care Mortality Experience**  
**For Policy Anniversaries in 2000 through Policy Anniversaries in 2011**  
**Experience Includes All Long-Term Care Forms Combined**  
**Expressing Deaths in Terms of Policy Count**  
**Expected Deaths Based on Current Assumptions**

<b>SUMMARY BY DURATION</b>				
<b>Duration</b>	<b>Actual Deaths</b>	<b>Expected Deaths</b>	<b>A/E</b>	<b>Difference</b>
1	100	98	102%	2
2	216	218	99%	(2)
3	418	399	105%	19
4	531	544	98%	(13)
5	811	800	101%	11
6	1,130	1,114	101%	16
7	1,470	1,434	103%	36
8	1,731	1,726	100%	5
9	2,149	2,147	100%	2
10	2,544	2,571	99%	(27)
11	2,943	2,918	101%	25
12	2,933	2,964	99%	(31)
13	2,834	2,833	100%	1
14	2,608	2,620	100%	(12)
15	2,428	2,484	98%	(56)
16	2,076	2,096	99%	(20)
17	1,736	1,754	99%	(18)
18	1,449	1,438	101%	11
19	1,150	1,148	100%	2
20	838	876	96%	(38)
21	533	515	104%	18
22	87	81	107%	6
<b>Total</b>	<b>32,715</b>	<b>32,779</b>	<b>100%</b>	<b>(64)</b>

<b>SUMMARY BY ISSUE AGE</b>				
<b>Issue Age</b>	<b>Actual Deaths</b>	<b>Expected Deaths</b>	<b>A/E</b>	<b>Difference</b>
<43	21	18	114%	3
43-47	102	112	91%	(10)
48-52	749	761	98%	(12)
53-57	2,252	2,245	100%	7
58-62	5,142	5,272	98%	(130)
63-67	7,904	7,863	101%	41
68-72	8,117	8,123	100%	(6)
73-77	5,639	5,637	100%	2
78-82	2,426	2,392	101%	34
83+	363	356	102%	7
<b>Total</b>	<b>32,715</b>	<b>32,779</b>	<b>100%</b>	<b>(64)</b>

<b>SUMMARY BY ALL DURATION / ISSUE AGE CELLS</b>			
<b>Actual Deaths</b>	<b>Expected Deaths</b>	<b>A/E</b>	<b>Difference</b>
<b>32,715</b>	<b>32,779</b>	<b>100%</b>	<b>(64)</b>

**EXHIBIT IV**  
**RiverSource Life Insurance Company**  
**Lapses and Benefit Reductions<sup>1</sup>**  
**Nationwide Experience**  
**Experience Includes All Long-Term Care Forms Combined**

<b>Additional Lapses Due to Rate Increase</b>									
<b>Increase Percent</b>	<b>Average Increase</b>	<b>Year of Increase</b>							<b>Weighted Average</b>
		<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	
< 10%	6.7%			0.9%	1.5%	1.7%	0.9%	1.2%	1.3%
10% - 14.9%	10.5%	0.7%	1.7%	1.4%	1.6%	2.0%	1.4%	1.3%	1.5%
15% - 19.9%	15.3%	0.7%	2.5%	1.3%	1.8%	1.8%	1.6%	1.4%	1.7%
20% - 29.9%	23.6%	1.8%	1.7%	1.2%	1.6%	2.5%		4.4%	1.7%
30%+	34.7%	2.9%	2.7%	2.0%	3.7%	13.2%			2.9%
<b>Total</b>	<b>16.3%</b>	<b>2.6%</b>	<b>2.5%</b>	<b>1.3%</b>	<b>1.8%</b>	<b>1.9%</b>	<b>1.5%</b>	<b>1.4%</b>	<b>1.9%</b>

<b>Policies Choosing Reduction in Benefits in Relation to Rate Increase Percentage</b>									
<b>Increase Percent</b>	<b>Average Increase</b>	<b>Year of Increase</b>							<b>Weighted Average</b>
		<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	
< 10%	6.7%			0.3%	0.2%	0.2%	0.4%	0.3%	0.2%
10% - 14.9%	10.5%	0.6%	0.6%	0.5%	0.4%	0.5%	0.4%	0.5%	0.5%
15% - 19.9%	15.3%	1.1%	0.8%	0.3%	0.7%	0.7%	0.6%	0.9%	0.7%
20% - 29.9%	23.6%	1.7%	1.8%	1.8%	1.4%	2.6%		1.8%	1.7%
30%+	34.7%	3.1%	2.8%	2.5%	3.5%	7.3%			3.0%
<b>Total</b>	<b>16.3%</b>	<b>1.4%</b>	<b>1.3%</b>	<b>0.8%</b>	<b>0.7%</b>	<b>0.8%</b>	<b>0.7%</b>	<b>0.8%</b>	<b>0.9%</b>

<sup>1</sup> The total percent reduction in benefit is typically no more than the percentage increase in premium.

**EXHIBIT V**  
**RiverSource Life Insurance Company**  
**Long-Term Care Lapse Experience**  
**For Policy Anniversaries in 2000 through Policy Anniversaries in 2011**  
**Experience Includes All Long-Term Care Forms Combined**  
**Expressing Lapses in Terms of Policy Count**  
**Expected Lapses Based on Current Assumptions**

LIFETIME BENEFIT PERIOD																
Duration	Issue Ages 35-62				Issue Ages 63-72				Issue Ages 73+				All Issue Ages			
	Actual			Expected Lapses	Actual			Expected Lapses	Actual			Expected Lapses	Actual			Expected Lapses
	Lapses	Exposure	Rate		Lapses	Exposure	Rate		Lapses	Exposure	Rate		Lapses	Exposure	Rate	
1	1,352	19,701	6.9%	6.9%	261	3,859	6.8%	6.8%	37	529	7.0%	7.0%	1,650	24,088	6.8%	6.9%
2	1,669	25,851	6.5%	6.5%	265	5,869	4.5%	4.5%	30	856	3.5%	3.5%	1,964	32,576	6.0%	6.1%
3	1,552	32,493	4.8%	4.8%	287	8,144	3.5%	3.5%	42	1,213	3.5%	3.5%	1,881	41,850	4.5%	4.5%
4	1,416	39,280	3.6%	3.6%	265	10,078	2.6%	2.6%	29	1,494	1.9%	1.9%	1,710	50,852	3.4%	3.4%
5	1,270	48,520	2.6%	2.6%	254	13,213	1.9%	1.9%	27	2,028	1.3%	1.3%	1,551	63,762	2.4%	2.4%
6	967	52,208	1.9%	1.9%	255	15,516	1.6%	1.6%	31	2,497	1.2%	1.3%	1,253	70,220	1.8%	1.8%
7	773	52,358	1.5%	1.5%	195	16,645	1.2%	1.1%	48	2,770	1.7%	1.3%	1,016	71,773	1.4%	1.4%
8	550	50,915	1.1%	1.1%	195	17,353	1.1%	1.1%	38	2,869	1.3%	1.3%	783	71,137	1.1%	1.1%
9	493	47,100	1.0%	1.1%	187	17,389	1.1%	1.1%	31	2,889	1.1%	1.3%	711	67,378	1.1%	1.1%
10	357	40,122	0.9%	0.8%	211	17,181	1.2%	1.1%	30	2,901	1.0%	1.3%	598	60,204	1.0%	0.9%
11	305	36,986	0.8%	0.7%	191	18,519	1.0%	0.9%	33	3,222	1.0%	1.4%	529	58,727	0.9%	0.8%
12	199	29,615	0.7%	0.7%	143	16,808	0.9%	0.9%	40	2,851	1.4%	1.5%	382	49,274	0.8%	0.8%
13	149	22,459	0.7%	0.7%	124	14,003	0.9%	0.9%	31	2,249	1.4%	1.5%	304	38,712	0.8%	0.8%
14	108	17,892	0.6%	0.7%	86	10,942	0.8%	0.9%	29	1,645	1.8%	1.6%	223	30,479	0.7%	0.8%
15	86	13,422	0.6%	0.7%	78	8,200	1.0%	0.9%	18	1,121	1.6%	1.6%	182	22,743	0.8%	0.8%
16	59	8,071	0.7%	0.7%	60	5,560	1.1%	1.0%	19	703	2.7%	1.7%	138	14,335	1.0%	0.9%
17	42	6,305	0.7%	0.7%	55	4,818	1.1%	1.1%	14	552	2.5%	1.7%	111	11,675	1.0%	0.9%
18	19	4,360	0.4%	0.7%	46	3,720	1.2%	1.2%	10	379	2.6%	1.8%	75	8,459	0.9%	1.0%
19	19	2,351	0.8%	0.7%	30	2,026	1.5%	1.2%	3	186	1.6%	1.8%	52	4,563	1.1%	1.0%
20	12	1,137	1.1%	0.8%	19	984	1.9%	1.2%	2	69	2.9%	1.9%	33	2,190	1.5%	1.0%
21	7	907	0.8%	0.8%	10	840	1.2%	1.3%	2	60	3.3%	1.9%	19	1,807	1.1%	1.1%
22	4	285	1.4%	0.8%	3	251	1.2%	1.3%	0	18	0.0%	2.0%	7	554	1.3%	1.1%
<b>All Durations</b>	<b>11,408</b>	<b>552,338</b>	<b>2.1%</b>	<b>2.1%</b>	<b>3,220</b>	<b>211,917</b>	<b>1.5%</b>	<b>1.5%</b>	<b>544</b>	<b>33,102</b>	<b>1.6%</b>	<b>1.6%</b>	<b>15,172</b>	<b>797,357</b>	<b>1.9%</b>	<b>1.9%</b>
<b>Durations 8 and later</b>	<b>2,409</b>	<b>281,927</b>	<b>0.9%</b>	<b>0.9%</b>	<b>1,438</b>	<b>138,594</b>	<b>1.0%</b>	<b>1.0%</b>	<b>300</b>	<b>21,715</b>	<b>1.4%</b>	<b>1.4%</b>	<b>4,147</b>	<b>442,236</b>	<b>0.9%</b>	<b>0.9%</b>

NON-LIFETIME BENEFIT PERIOD																
Duration	Issue Ages 35-62				Issue Ages 63-72				Issue Ages 73+				All Issue Ages			
	Actual			Expected Lapses	Actual			Expected Lapses	Actual			Expected Lapses	Actual			Expected Lapses
	Lapses	Exposure	Rate		Lapses	Exposure	Rate		Lapses	Exposure	Rate		Lapses	Exposure	Rate	
1	1,927	27,994	6.9%	6.9%	677	9,598	7.1%	7.1%	116	2,177	5.3%	5.3%	2,720	39,770	6.8%	6.9%
2	2,079	34,647	6.0%	6.0%	644	13,309	4.8%	4.8%	151	3,289	4.6%	4.6%	2,874	51,244	5.6%	5.6%
3	1,599	38,297	4.2%	4.2%	542	16,222	3.3%	3.3%	128	4,194	3.1%	3.1%	2,269	58,713	3.9%	3.9%
4	1,227	39,300	3.1%	3.1%	503	17,424	2.9%	2.9%	134	4,614	2.9%	2.9%	1,864	61,338	3.0%	3.0%
5	975	41,636	2.3%	2.3%	391	19,997	2.0%	2.0%	124	5,566	2.2%	2.2%	1,490	67,199	2.2%	2.2%
6	712	40,884	1.7%	1.7%	408	21,641	1.9%	1.9%	133	6,387	2.1%	2.1%	1,253	68,912	1.8%	1.8%
7	566	37,665	1.5%	1.5%	325	21,705	1.5%	1.6%	149	6,647	2.2%	2.3%	1,040	66,016	1.6%	1.6%
8	431	36,886	1.2%	1.2%	316	22,005	1.4%	1.4%	150	6,595	2.3%	2.5%	897	65,486	1.4%	1.4%
9	381	35,498	1.1%	1.2%	288	21,531	1.3%	1.3%	155	6,296	2.5%	2.7%	824	63,325	1.3%	1.4%
10	249	26,568	0.9%	1.0%	212	18,992	1.1%	1.3%	183	5,718	3.2%	3.4%	644	51,279	1.3%	1.4%
11	191	20,698	0.9%	1.0%	278	17,899	1.6%	1.5%	194	5,405	3.6%	3.9%	663	44,002	1.5%	1.6%
12	160	15,654	1.0%	0.9%	220	15,368	1.4%	1.5%	168	4,416	3.8%	4.0%	548	35,437	1.5%	1.5%
13	91	10,814	0.8%	0.8%	180	12,036	1.5%	1.5%	142	3,301	4.3%	4.4%	413	26,151	1.6%	1.6%
14	57	7,737	0.7%	0.8%	120	9,125	1.3%	1.5%	124	2,299	5.4%	4.8%	301	19,162	1.6%	1.6%
15	42	6,206	0.7%	0.7%	125	7,199	1.7%	1.6%	79	1,598	4.9%	4.9%	246	15,003	1.6%	1.6%
16	29	4,142	0.7%	0.7%	95	4,881	1.9%	1.8%	57	1,009	5.7%	5.4%	181	10,032	1.8%	1.7%
17	29	2,850	1.0%	0.8%	74	3,802	1.9%	2.0%	41	718	5.7%	5.4%	144	7,371	2.0%	1.9%
18	16	1,970	0.8%	0.8%	50	2,831	1.8%	2.2%	27	468	5.8%	5.4%	93	5,269	1.8%	2.0%
19	14	1,133	1.2%	0.9%	36	1,601	2.2%	2.4%	9	219	4.1%	5.4%	59	2,952	2.0%	2.0%
20	7	560	1.3%	0.9%	28	811	3.5%	2.6%	4	106	3.8%	5.4%	39	1,476	2.6%	2.2%
21	5	319	1.6%	0.9%	15	508	3.0%	2.8%	3	54	5.5%	5.4%	23	881	2.6%	2.3%
22	0	123	0.0%	0.9%	2	144	1.4%	3.0%	1	13	7.6%	5.4%	3	280	1.1%	2.2%
<b>All Durations</b>	<b>10,787</b>	<b>431,579</b>	<b>2.5%</b>	<b>2.5%</b>	<b>5,529</b>	<b>258,630</b>	<b>2.1%</b>	<b>2.2%</b>	<b>2,272</b>	<b>71,088</b>	<b>3.2%</b>	<b>3.3%</b>	<b>18,588</b>	<b>761,298</b>	<b>2.4%</b>	<b>2.5%</b>
<b>Durations 8 and later</b>	<b>1,702</b>	<b>171,157</b>	<b>1.0%</b>	<b>1.0%</b>	<b>2,039</b>	<b>138,734</b>	<b>1.5%</b>	<b>1.5%</b>	<b>1,337</b>	<b>38,215</b>	<b>3.5%</b>	<b>3.6%</b>	<b>5,078</b>	<b>348,106</b>	<b>1.5%</b>	<b>1.5%</b>

**EXHIBIT VI**  
**RiverSource Life Insurance Company**  
**Prior 2007 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2007 Rate Increase Filing Assumptions:**

**Mortality:** 1983 Individual Annuitant Mortality Basic Table with selection consistent with experience.

**Mortality Selection Factors**

Duration	Issue Age Band					
	<58	58-62	63-67	68-72	73-77	78+
1	20%	20%	20%	20%	20%	20%
2	25%	25%	30%	30%	25%	25%
3	35%	35%	45%	50%	35%	35%
4	45%	45%	45%	50%	35%	35%
5	50%	50%	45%	50%	40%	40%
6	55%	55%	55%	60%	70%	75%
7	55%	55%	55%	65%	75%	75%
8	55%	55%	60%	65%	75%	75%
9	55%	55%	75%	80%	85%	85%
10	80%	80%	75%	80%	85%	85%
11	80%	80%	75%	85%	85%	95%
12	85%	85%	85%	90%	90%	100%
13	85%	85%	85%	90%	90%	100%
14	90%	90%	85%	90%	95%	100%
15	95%	95%	90%	95%	100%	100%
16	95%	95%	90%	95%	100%	100%
17	95%	95%	95%	95%	100%	100%
18	95%	95%	100%	100%	100%	100%
19	95%	95%	100%	100%	100%	100%
20+	100%	100%	100%	100%	100%	100%

**EXHIBIT VI**  
**RiverSource Life Insurance Company**  
**Prior 2007 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2007 Rate Increase Filing Assumptions (continued):**

**Lapse Rates:**

Duration	Lifetime Benefit			Duration	Non-Lifetime Benefit		
	Issue Age Band				Issue Age Band		
	<63	63-72	73+		<63	63-72	73+
1	6.5%	5.2%	5.0%	1	6.0%	5.4%	5.2%
2	6.5%	4.2%	2.8%	2	5.6%	4.1%	3.9%
3	4.9%	2.1%	3.5%	3	4.3%	3.0%	2.6%
4	2.9%	2.1%	1.3%	4	2.8%	1.8%	2.0%
5	2.6%	1.2%	1.2%	5	2.2%	2.6%	2.8%
6	1.8%	1.3%	1.0%	6	1.7%	1.3%	1.8%
7	1.9%	1.0%	1.0%	7	1.0%	1.0%	1.3%
8	1.0%	1.0%	1.0%	8	1.0%	1.3%	1.5%
9	0.9%	1.1%	1.3%	9	1.2%	1.3%	3.0%
10	0.9%	1.0%	1.3%	10	1.2%	1.3%	3.5%
11	0.9%	0.9%	1.3%	11	1.2%	1.3%	4.0%
12	0.9%	0.9%	1.3%	12	1.2%	1.3%	4.2%
13	0.9%	0.9%	1.3%	13	1.2%	1.3%	4.3%
14	0.9%	0.9%	1.3%	14	1.2%	1.3%	4.4%
15	0.9%	0.9%	1.3%	15	1.2%	1.6%	4.5%
16	0.9%	1.0%	1.3%	16	1.2%	1.8%	4.5%
17	0.9%	1.1%	1.3%	17	1.2%	2.0%	4.5%
18	0.9%	1.1%	1.3%	18	1.2%	2.6%	4.5%
19	0.9%	1.1%	1.3%	19	1.2%	2.8%	4.5%
20	0.9%	1.1%	1.3%	20	1.2%	3.0%	4.5%
21	0.9%	1.1%	1.3%	21	1.2%	3.5%	4.5%
22	0.9%	1.1%	1.3%	22	1.2%	3.7%	4.5%
23	0.9%	1.1%	1.3%	23	1.2%	3.8%	4.5%
24	0.9%	1.1%	1.3%	24	1.2%	3.9%	4.5%
25	0.9%	1.1%	1.3%	25	1.4%	4.0%	4.5%
26	0.9%	1.1%	1.3%	26	1.5%	4.0%	4.5%
27	1.0%	1.1%	1.3%	27	1.6%	4.0%	4.5%
28	1.0%	1.1%	1.3%	28	2.1%	4.0%	4.5%
29	1.0%	1.1%	1.3%	29	2.4%	4.0%	4.5%
30	1.0%	1.1%	1.3%	30	2.6%	4.0%	4.5%
31	1.0%	1.1%	1.3%	31	2.9%	4.0%	4.5%
32	1.0%	1.1%	1.3%	32	3.1%	4.0%	4.5%
33	1.0%	1.1%	1.3%	33	3.2%	4.0%	4.5%
34	1.0%	1.1%	1.3%	34	3.3%	4.0%	4.5%
35	1.0%	1.1%	1.3%	35	3.4%	4.0%	4.5%
36	1.0%	1.1%	1.3%	36	3.5%	4.0%	4.5%
37+	1.0%	1.1%	1.3%	37+	3.5%	4.0%	4.5%

**EXHIBIT VI**  
**RiverSource Life Insurance Company**  
**Prior 2007 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2007 Rate Increase Filing Assumptions (continued):**

**Morbidity:** Expected Claim Costs are the product of original pricing expected claim costs and an actual-to-expected adjustment factor (provided below). Morbidity used in the projections has also been reduced by 5% for anticipated improved claim experience from changes in claim management starting in 2003. Actual-to-expected adjustment factors were developed from actual emerging experience through anniversaries ending September 2005.

Duration	Actual-to-Expected Factor
1	0.600
2	0.650
3	0.700
4	0.750
5	0.800
6	0.850
7	0.900
8	0.950
9	1.000
10+	1.000

**Interest Rate:** 5.0%

**EXHIBIT VII**  
**RiverSource Life Insurance Company**  
**Prior 2011 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2011 Rate Increase Filing Assumptions:**

**Mortality:** 1983 Individual Annuitant Mortality Basic Table with selection consistent with experience

		<b>Mortality Selection Factors</b>					
		<b>Issue Age Band</b>					
Duration	<58	58-62	63-67	68-72	73-77	78+	
1	20%	20%	25%	20%	20%	25%	
2	25%	35%	40%	30%	25%	25%	
3	35%	45%	45%	45%	40%	35%	
4	40%	50%	45%	45%	45%	35%	
5	45%	50%	45%	55%	50%	55%	
6	50%	50%	55%	55%	60%	60%	
7	55%	55%	60%	60%	65%	65%	
8	55%	55%	60%	60%	70%	75%	
9	55%	55%	70%	75%	75%	85%	
10	55%	65%	70%	80%	75%	85%	
11	65%	70%	70%	80%	75%	85%	
12	65%	70%	70%	80%	85%	90%	
13	65%	70%	75%	85%	95%	100%	
14	65%	75%	75%	90%	95%	100%	
15	70%	75%	75%	90%	95%	100%	
16	70%	75%	85%	90%	95%	100%	
17	70%	75%	85%	90%	100%	100%	
18	75%	75%	85%	90%	100%	100%	
19	85%	75%	85%	95%	100%	100%	
20	85%	80%	90%	100%	100%	100%	
21	85%	85%	90%	100%	100%	100%	
22	85%	85%	90%	100%	100%	100%	
23	85%	85%	95%	100%	100%	100%	
24	85%	90%	95%	100%	100%	100%	
25	90%	90%	100%	100%	100%	100%	
26	90%	90%	100%	100%	100%	100%	
27	90%	90%	100%	100%	100%	100%	
28	90%	95%	100%	100%	100%	100%	
29	90%	95%	100%	100%	100%	100%	
30	90%	100%	100%	100%	100%	100%	
31	90%	100%	100%	100%	100%	100%	
32	95%	100%	100%	100%	100%	100%	
33	95%	100%	100%	100%	100%	100%	
34	95%	100%	100%	100%	100%	100%	
35+	100%	100%	100%	100%	100%	100%	

**EXHIBIT VII**  
**RiverSource Life Insurance Company**  
**Prior 2011 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2011 Rate Increase Filing Assumptions**

**Lapse Rates:**

Duration	Lifetime Benefit		
	Issue Age Band		
	<63	63-72	73+
1	6.8%	6.7%	6.8%
2	6.4%	4.4%	3.4%
3	4.7%	3.5%	3.4%
4	3.6%	2.6%	1.9%
5	2.6%	1.9%	1.3%
6	1.6%	1.7%	1.3%
7	1.4%	1.1%	1.3%
8	1.0%	1.1%	1.3%
9	1.0%	1.1%	1.3%
10	0.8%	1.0%	1.3%
11	0.7%	0.9%	1.4%
12	0.7%	0.9%	1.5%
13	0.7%	0.9%	1.5%
14	0.7%	0.9%	1.6%
15	0.7%	0.9%	1.6%
16	0.7%	1.0%	1.7%
17	0.7%	1.1%	1.8%
18	0.7%	1.2%	1.8%
19	0.7%	1.2%	1.8%
20	0.8%	1.2%	1.8%
21	0.8%	1.3%	1.8%
22	0.8%	1.3%	1.8%
23	0.8%	1.4%	1.8%
24	0.9%	1.4%	1.8%
25	0.9%	1.4%	1.8%
26	0.9%	1.4%	1.8%
27	1.0%	1.4%	1.8%
28	1.0%	1.4%	1.8%
29	1.0%	1.4%	1.8%
30	1.0%	1.4%	1.8%
31	1.1%	1.4%	1.8%
32	1.1%	1.4%	1.8%
33	1.1%	1.4%	1.8%
34	1.1%	1.4%	1.8%
35	1.1%	1.4%	1.8%
36+	1.1%	1.4%	1.8%

Duration	Non-Lifetime Benefit		
	Issue Age Band		
	<63	63-72	73+
1	6.9%	7.1%	5.4%
2	6.0%	4.9%	4.6%
3	4.2%	3.4%	3.1%
4	3.1%	2.9%	2.9%
5	2.4%	2.0%	2.3%
6	1.8%	1.8%	2.3%
7	1.4%	1.6%	2.4%
8	1.2%	1.3%	2.6%
9	1.2%	1.3%	2.8%
10	1.1%	1.3%	3.5%
11	1.0%	1.4%	4.0%
12	0.9%	1.4%	4.2%
13	0.8%	1.4%	4.4%
14	0.8%	1.5%	4.7%
15	0.8%	1.6%	4.9%
16	0.8%	1.8%	5.1%
17	0.8%	2.0%	5.3%
18	0.8%	2.2%	5.4%
19	0.9%	2.4%	5.4%
20	0.9%	2.6%	5.4%
21	0.9%	2.8%	5.4%
22	0.9%	3.0%	5.4%
23	1.0%	3.2%	5.4%
24	1.2%	3.4%	5.4%
25	1.4%	3.6%	5.4%
26	1.5%	3.8%	5.4%
27	1.6%	4.0%	5.4%
28	2.1%	4.0%	5.4%
29	2.4%	4.0%	5.4%
30	2.6%	4.0%	5.4%
31	2.9%	4.0%	5.4%
32	3.1%	4.0%	5.4%
33	3.2%	4.0%	5.4%
34	3.3%	4.0%	5.4%
35	3.4%	4.0%	5.4%
36+	3.5%	4.0%	5.4%

**EXHIBIT VII**  
**RiverSource Life Insurance Company**  
**Prior 2011 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2011 Rate Increase Filing Assumptions (cont):**

**Morbidity:** Expected Claim Costs are the product of original pricing expected claim costs and an actual-to-expected adjustment factor. Morbidity used in the projections has also been reduced by 5% for anticipated improved claim experience from changes in claim management starting in 2003. Actual-to-expected adjustment factors were developed from actual emerging experience through anniversaries ending December 2009.

**Lifetime Benefit Actual-to-Expected Adjustment Factors**

Duration	Age at Issue							
	<48	48-52	53-57	58-62	63-67	68-72	73-77	78+
1	0.10	0.10	0.20	0.20	0.30	0.30	1.05	1.45
2	0.08	0.10	0.25	0.25	0.30	0.30	1.05	1.45
3	0.07	0.10	0.30	0.30	0.30	0.30	1.05	1.45
4	0.07	0.10	0.30	0.30	0.95	1.00	1.05	1.60
5	0.06	0.10	0.30	0.30	0.95	1.00	1.05	1.60
6	0.06	0.10	0.30	0.30	0.95	1.00	1.05	1.60
7	0.07	0.10	0.30	0.30	0.95	1.00	1.05	1.60
8	0.07	0.25	0.35	0.40	0.95	1.05	1.20	1.60
9	0.07	0.30	0.35	0.40	0.95	1.05	1.25	1.60
10	0.07	0.30	0.35	0.50	0.95	1.15	1.25	1.60
11	0.07	0.30	0.35	0.55	0.95	1.15	1.25	1.60
12	0.07	0.30	0.40	0.60	0.95	1.15	1.25	1.60
13	0.20	0.35	0.40	0.65	0.95	1.15	1.25	1.60
14	0.27	0.35	0.40	0.70	0.95	1.15	1.25	1.60
15	0.30	0.35	0.50	0.75	0.95	1.15	1.25	1.60
16	0.30	0.35	0.55	0.80	0.95	1.15	1.25	1.60
17	0.30	0.40	0.60	0.85	0.95	1.15	1.25	1.60
18	0.35	0.40	0.65	0.85	0.95	1.15	1.25	1.60
19	0.35	0.40	0.70	0.85	0.95	1.15	1.25	1.60
20	0.35	0.50	0.75	0.85	0.95	1.15	1.25	1.60
21	0.35	0.55	0.80	0.90	1.00	1.15	1.30	1.60
22	0.40	0.60	0.85	0.90	1.00	1.15	1.30	1.60
23	0.40	0.65	0.85	0.90	1.00	1.15	1.30	1.60
24	0.40	0.70	0.85	0.95	1.00	1.15	1.30	1.60
25	0.50	0.75	0.85	0.95	1.00	1.15	1.30	1.60
26	0.55	0.80	0.85	1.00	1.00	1.15	1.30	1.60
27	0.60	0.85	0.85	1.00	1.00	1.15	1.30	1.60
28	0.65	0.85	0.85	1.00	1.00	1.15	1.30	1.60
29	0.70	0.85	0.90	1.00	1.00	1.15	1.30	1.60
30	0.75	0.85	0.95	1.00	1.00	1.15	1.30	1.60
31	0.80	0.90	1.00	1.00	1.00	1.15	1.30	1.60
32	0.85	0.90	1.00	1.00	1.00	1.15	1.30	1.60
33	0.85	0.95	1.00	1.00	1.00	1.15	1.30	1.60
34	0.85	0.95	1.00	1.00	1.00	1.15	1.30	1.60
35	0.85	1.00	1.00	1.00	1.00	1.15	1.30	1.60
36	0.90	1.00	1.00	1.00	1.00	1.15	1.30	1.60
37	0.90	1.00	1.00	1.00	1.00	1.15	1.30	1.60
38	0.95	1.00	1.00	1.00	1.00	1.15	1.30	1.60
39	0.95	1.00	1.00	1.00	1.00	1.15	1.30	1.60
40+	1.00	1.00	1.00	1.00	1.00	1.15	1.30	1.60

**EXHIBIT VII**  
**RiverSource Life Insurance Company**  
**Prior 2011 Rate Increase Assumptions**

**Policy Form:** 30160A-VA, Subject to Endorsement Form 32100

**Prior 2011 Rate Increase Filing Assumptions (cont):**

**Morbidity (continued):**

Duration	Non-Lifetime Benefit Actual-to-Expected Adjustment Factors								
	Age at Issue								
	<48	48-52	53-57	58-62	63-67	68-72	73-77	78-82	83+
1	0.10	0.10	0.10	0.25	0.25	0.50	0.50	0.50	1.25
2	0.08	0.15	0.15	0.25	0.25	0.50	0.65	0.75	1.25
3	0.07	0.15	0.15	0.40	0.35	0.60	0.65	0.75	1.45
4	0.07	0.15	0.15	0.40	0.35	0.60	0.65	0.75	2.00
5	0.06	0.15	0.15	0.40	0.35	0.60	1.30	0.75	2.00
6	0.06	0.15	0.35	0.45	0.65	1.10	1.30	1.50	2.00
7	0.10	0.15	0.35	0.45	0.85	1.10	1.30	1.60	2.00
8	0.10	0.25	0.35	0.60	0.90	1.25	1.30	1.70	2.00
9	0.10	0.25	0.35	0.70	1.00	1.25	1.30	1.70	2.00
10	0.10	0.25	0.35	0.70	1.05	1.25	1.30	1.70	2.00
11	0.11	0.30	0.35	0.70	1.05	1.25	1.30	1.70	2.00
12	0.11	0.30	0.40	0.70	1.05	1.25	1.30	1.70	2.00
13	0.20	0.30	0.40	0.70	1.05	1.25	1.30	1.70	2.00
14	0.23	0.30	0.40	0.70	1.05	1.25	1.30	1.70	2.00
15	0.25	0.30	0.40	0.80	1.05	1.25	1.30	1.70	2.00
16	0.30	0.30	0.60	0.80	1.05	1.25	1.30	1.70	2.00
17	0.30	0.40	0.60	0.80	1.05	1.25	1.30	1.70	2.00
18	0.30	0.40	0.60	0.80	1.05	1.25	1.30	1.70	2.00
19	0.30	0.40	0.60	0.85	1.05	1.25	1.30	1.70	2.00
20	0.30	0.40	0.80	1.00	1.05	1.25	1.30	1.70	2.00
21	0.30	0.60	0.80	1.00	1.05	1.25	1.30	1.70	2.00
22	0.40	0.60	0.80	1.00	1.05	1.25	1.30	1.70	2.00
23	0.40	0.60	0.80	1.00	1.05	1.25	1.30	1.70	2.00
24	0.40	0.60	0.85	1.00	1.05	1.25	1.30	1.70	2.00
25	0.40	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
26	0.60	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
27	0.60	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
28	0.60	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
29	0.60	0.85	1.00	1.00	1.05	1.25	1.30	1.70	2.00
30	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
31	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
32	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
33	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
34	0.85	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
35+	1.00	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00

**Interest Rate:** 5.0%

**EXHIBIT VIII**  
**RiverSource Life Insurance Company**  
**Nationwide Experience Projections with No Increase**  
**Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis**  
**Policy Form: 30160A, Subject to Endorsement Form 32100**

	Calendar Year	Ending Policies Inforce	Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest					Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
			Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio		
Historical Experience	2000	9,837	3,318,006	0	0	0.0%	0.0%	6,180,744	0	0	0.0%	0.0%	5.00%	1.8628
	2001	25,544	26,856,424	22,638	521,781	0.1%	1.9%	47,645,561	40,162	925,684	0.1%	1.9%	5.00%	1.7741
	2002	39,114	48,223,494	145,719	1,733,934	0.3%	3.6%	81,478,614	246,207	2,929,661	0.3%	3.6%	5.00%	1.6896
	2003	37,807	58,081,691	591,980	1,472,260	1.0%	2.5%	93,461,967	952,583	2,369,083	1.0%	2.5%	5.00%	1.6091
	2004	36,451	55,102,185	1,048,390	4,534,800	1.9%	8.2%	84,445,243	1,606,680	6,949,676	1.9%	8.2%	5.00%	1.5325
	2005	35,453	53,280,360	1,902,407	6,585,885	3.6%	12.4%	77,765,007	2,776,645	9,612,387	3.6%	12.4%	5.00%	1.4595
	2006	34,704	51,930,869	3,112,631	6,028,979	6.0%	11.6%	72,186,063	4,326,686	8,380,531	6.0%	11.6%	5.00%	1.3900
	2007	34,073	50,926,950	4,698,723	11,750,005	9.2%	23.1%	67,419,595	6,220,400	15,555,233	9.2%	23.1%	5.00%	1.3238
	2008	33,150	52,947,252	6,848,733	9,067,876	12.9%	17.1%	66,756,351	8,634,942	11,432,857	12.9%	17.1%	5.00%	1.2608
	2009	32,433	52,314,127	8,907,559	15,602,982	17.0%	29.8%	62,817,241	10,695,931	18,735,594	17.0%	29.8%	5.00%	1.2008
	2010	31,770	51,078,462	12,070,257	13,748,182	23.6%	26.9%	58,412,849	13,803,433	15,722,291	23.6%	26.9%	5.00%	1.1436
	2011	31,155	49,861,552	15,522,996	19,026,800	31.1%	38.2%	54,305,907	16,906,621	20,722,732	31.1%	38.2%	5.00%	1.0891
	2012	30,489	50,194,429	18,870,174	20,918,626	37.6%	41.7%	52,065,194	19,573,473	21,698,271	37.6%	41.7%	5.00%	1.0373
1/2013-3/2013	30,369	12,912,371	3,909,329	5,332,522	30.3%	41.3%	12,991,361	3,933,244	5,365,143	30.3%	41.3%	5.00%	1.0061	
Projected Future Experience	4/2013-12/2013	29,797	38,562,053	16,582,612	17,712,219	43.0%	45.9%	37,862,925	16,281,970	17,391,097	43.0%	45.9%	5.00%	0.9819
	2014	29,034	50,018,292	19,677,241	25,677,381	39.3%	51.3%	47,058,950	18,513,033	24,158,174	39.3%	51.3%	5.00%	0.9408
	2015	28,250	48,390,671	23,647,787	28,129,057	48.9%	58.1%	43,359,645	21,189,201	25,204,567	48.9%	58.1%	5.00%	0.8960
	2016	27,433	46,723,639	27,665,482	30,747,296	59.2%	65.8%	39,872,314	23,608,751	26,238,663	59.2%	65.8%	5.00%	0.8534
	2017	26,579	45,008,117	31,277,994	33,752,786	69.5%	75.0%	36,579,379	25,420,517	27,431,850	69.5%	75.0%	5.00%	0.8127
	2018	25,690	43,245,935	34,254,446	36,941,434	79.2%	85.4%	33,473,527	26,513,871	28,593,672	79.2%	85.4%	5.00%	0.7740
	2019	24,767	41,448,224	37,396,980	40,459,711	90.2%	97.6%	30,554,333	27,567,868	29,825,632	90.2%	97.6%	5.00%	0.7372
	2020	23,809	39,614,822	40,597,256	44,534,472	102.5%	112.4%	27,812,196	28,501,929	31,266,113	102.5%	112.4%	5.00%	0.7021
	2021	22,819	37,744,958	44,215,599	48,943,840	117.1%	129.7%	25,237,552	29,564,041	32,725,503	117.1%	129.7%	5.00%	0.6686
	2022	21,799	35,845,251	48,212,861	53,422,471	134.5%	149.0%	22,826,042	30,701,662	34,019,111	134.5%	149.0%	5.00%	0.6368
	2023	20,750	33,923,914	52,503,015	58,068,035	154.8%	171.2%	20,573,853	31,841,530	35,216,550	154.8%	171.2%	5.00%	0.6065
	2024	19,660	31,974,184	57,043,616	62,733,645	178.4%	196.2%	18,468,000	32,947,877	36,234,386	178.4%	196.2%	5.00%	0.5776
	2025	18,528	29,987,213	61,767,783	67,223,291	206.0%	224.2%	16,495,565	33,977,632	36,978,633	206.0%	224.2%	5.00%	0.5501
	2026	17,368	27,974,817	66,637,058	71,756,388	238.2%	256.5%	14,655,783	34,910,623	37,592,599	238.2%	256.5%	5.00%	0.5239
	2027	16,201	25,968,971	71,596,511	76,138,351	275.7%	293.2%	12,957,083	35,722,706	37,988,833	275.7%	293.2%	5.00%	0.4989
	2028	15,027	23,985,944	76,532,490	80,529,406	319.1%	335.7%	11,397,773	36,367,130	38,266,407	319.1%	335.7%	5.00%	0.4752
	2029	13,849	22,026,301	81,464,837	85,061,230	369.9%	386.2%	9,968,171	36,867,533	38,495,108	369.9%	386.2%	5.00%	0.4526
	2030	12,677	20,095,831	86,368,203	89,176,998	429.8%	443.8%	8,661,449	37,225,323	38,435,934	429.8%	443.8%	5.00%	0.4310
	2031	11,525	18,214,773	91,034,484	92,291,932	499.8%	506.7%	7,476,857	37,368,118	37,884,279	499.8%	506.7%	5.00%	0.4105
	2032	10,399	16,394,492	95,083,310	93,749,692	580.0%	571.8%	6,409,202	37,171,517	36,650,157	580.0%	571.8%	5.00%	0.3909
	2033	9,314	14,648,965	98,180,271	93,860,967	670.2%	640.7%	5,454,107	36,554,506	34,946,342	670.2%	640.7%	5.00%	0.3723
	2034	8,282	12,995,788	100,195,967	93,189,247	771.0%	717.1%	4,608,186	35,528,562	33,044,045	771.0%	717.1%	5.00%	0.3546
	2035	7,307	11,446,088	101,232,599	92,055,510	884.4%	804.3%	3,865,407	34,186,803	31,087,649	884.4%	804.3%	5.00%	0.3377
	2036	6,393	10,001,407	101,369,508	89,898,680	1013.6%	898.9%	3,216,695	32,602,893	28,913,596	1013.6%	898.9%	5.00%	0.3216
	2037	5,548	8,667,074	100,522,983	86,479,683	1159.8%	997.8%	2,654,801	30,791,076	26,489,490	1159.8%	997.8%	5.00%	0.3063
	2038	4,779	7,454,297	98,608,799	82,102,901	1322.8%	1101.4%	2,174,587	28,766,423	23,951,279	1322.8%	1101.4%	5.00%	0.2917
	2039	4,086	6,364,529	95,703,598	77,231,656	1503.7%	1213.5%	1,768,264	26,589,439	21,457,358	1503.7%	1213.5%	5.00%	0.2778
	2040	3,467	5,393,568	91,938,787	71,931,446	1704.6%	1333.7%	1,427,144	24,327,102	19,033,138	1704.6%	1333.7%	5.00%	0.2646
	2041	2,918	4,535,573	87,440,264	66,321,994	1927.9%	1462.3%	1,142,969	22,035,036	16,713,210	1927.9%	1462.3%	5.00%	0.2520
	2042	2,436	3,783,853	82,346,551	60,532,594	2176.3%	1599.8%	908,128	19,763,252	14,527,881	2176.3%	1599.8%	5.00%	0.2400
	2043	2,016	3,131,023	76,801,250	54,688,816	2452.9%	1746.7%	715,665	17,554,643	12,500,351	2452.9%	1746.7%	5.00%	0.2286
	2044	1,654	2,569,192	70,953,187	48,910,757	2761.7%	1903.7%	559,282	15,445,654	10,647,283	2761.7%	1903.7%	5.00%	0.2177
	2045	1,346	2,090,141	64,936,467	43,291,462	3106.8%	2071.2%	433,332	13,462,749	8,975,267	3106.8%	2071.2%	5.00%	0.2073
	2046	1,084	1,685,505	58,873,204	37,922,650	3492.9%	2249.9%	332,802	11,624,479	7,487,804	3492.9%	2249.9%	5.00%	0.1974
2047	866	1,346,967	52,875,850	32,870,641	3925.5%	2440.3%	253,293	9,943,147	6,181,227	3925.5%	2440.3%	5.00%	0.1880	
2048	684	1,066,452	47,042,725	28,186,091	4411.1%	2643.0%	190,993	8,424,995	5,047,915	4411.1%	2643.0%	5.00%	0.1791	
2049	536	836,276	41,458,989	23,904,689	4957.6%	2858.5%	142,639	7,071,420	4,077,284	4957.6%	2858.5%	5.00%	0.1706	
2050	415	649,276	36,189,966	20,040,449	5573.9%	3086.6%	105,470	5,878,774	3,255,413	5573.9%	3086.6%	5.00%	0.1624	
2051	318	498,894	31,284,171	16,599,679	6270.7%	3327.3%	77,182	4,839,873	2,568,083	6270.7%	3327.3%	5.00%	0.1547	
2052	241	379,223	26,775,525	13,579,509	7060.6%	3580.9%	55,875	3,945,100	2,000,802	7060.6%	3580.9%	5.00%	0.1473	
2053	180	285,024	22,684,138	10,964,376	7958.7%	3846.8%	39,996	3,183,120	1,538,561	7958.7%	3846.8%	5.00%	0.1403	
2054	133	211,713	19,018,077	8,735,338	8982.9%	4126.0%	28,294	2,541,605	1,167,404	8982.9%	4126.0%	5.00%	0.1336	
2055	97	155,331	15,774,541	6,863,161	10155.4%	4418.4%	19,770	2,007,746	873,527	10155.4%	4418.4%	5.00%	0.1273	
2056	70	112,503	12,941,101	5,314,990	11502.9%	4724.3%	13,637	1,568,679	644,266	11502.9%	4724.3%	5.00%	0.1212	
2057	50	80,386	10,497,515	4,055,094	13058.8%	5044.5%	9,280	1,211,881	468,139	13058.8%	5044.5%	5.00%	0.1154	
2058	35	56,624	8,417,443	3,046,071	14865.5%	5379.5%	6,226	925,474	334,907	14865.5%	5379.5%	5.00%	0.1099	
2059	24	39,285	6,669,562	2,249,755	16977.4%	5726.7%	4,114	698,381	235,575	16977.4%	5726.7%	5.00%	0.1047	
2060	16	26,814	5,219,954	1,631,555	19467.0%	6084.6%	2,674	520,562	162,707	19467.0%	6084.6%	5.00%	0.0997	
2061	11	17,979	4,033,369	1,159,192	22433.5%	6447.4%	1,708	383,075	110,096	22433.5%	6447.4%	5.00%	0.0950	
2062	7	11,819	3,074,908	804,966	26015.7%	6810.5%	1,069	278,137	72,812	26015.7%	6810.5%	5.00%	0.0905	
Past			617,028,171	77,651,536	116,324,632	12.6%	18.9%	837						

**EXHIBIT VIII**  
**RiverSource Life Insurance Company**  
**Nationwide Experience Projections with 10% Increase**  
**Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis**  
**Policy Form: 30160A, Subject to Endorsement Form 32100**

	Calendar Year	Ending Policies Inforce	Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest					Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
			Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio		
Historical Experience	2000	9,837	3,318,006	0	0	0.0%	0.0%	6,180,744	0	0	0.0%	0.0%	5.00%	1.8628
	2001	25,544	26,856,424	22,638	521,781	0.1%	1.9%	47,645,561	40,162	925,684	0.1%	1.9%	5.00%	1.7741
	2002	39,114	48,223,494	145,719	1,733,934	0.3%	3.6%	81,478,614	246,207	2,929,661	0.3%	3.6%	5.00%	1.6896
	2003	37,807	58,081,691	591,980	1,472,260	1.0%	2.5%	93,461,967	952,583	2,369,083	1.0%	2.5%	5.00%	1.6091
	2004	36,451	55,102,185	1,048,390	4,534,800	1.9%	8.2%	84,445,243	1,606,680	6,949,676	1.9%	8.2%	5.00%	1.5325
	2005	35,453	53,280,360	1,902,407	6,585,885	3.6%	12.4%	77,765,007	2,776,645	9,612,387	3.6%	12.4%	5.00%	1.4595
	2006	34,704	51,930,869	3,112,631	6,028,979	6.0%	11.6%	72,186,063	4,326,686	8,380,531	6.0%	11.6%	5.00%	1.3900
	2007	34,073	50,926,950	4,698,723	11,750,005	9.2%	23.1%	67,419,595	6,220,400	15,555,233	9.2%	23.1%	5.00%	1.3238
	2008	33,150	52,947,252	6,848,733	9,067,876	12.9%	17.1%	66,756,351	8,634,942	11,432,857	12.9%	17.1%	5.00%	1.2608
	2009	32,433	52,314,127	8,907,559	15,602,982	17.0%	29.8%	62,817,241	10,695,931	18,735,594	17.0%	29.8%	5.00%	1.2008
	2010	31,770	51,078,462	12,070,257	13,748,182	23.6%	26.9%	58,412,849	13,803,433	15,722,291	23.6%	26.9%	5.00%	1.1436
	2011	31,155	49,861,552	15,522,996	19,026,800	31.1%	38.2%	54,305,907	16,906,621	20,722,732	31.1%	38.2%	5.00%	1.0891
	2012	30,489	50,194,429	18,870,174	20,918,626	37.6%	41.7%	52,065,194	19,573,473	21,698,271	37.6%	41.7%	5.00%	1.0373
1/2013-3/2013	30,369	12,912,371	3,909,329	5,332,522	30.3%	41.3%	12,991,361	3,933,244	5,365,143	30.3%	41.3%	5.00%	1.0061	
Projected Future Experience	4/2013-12/2013	29,797	38,562,053	16,582,612	17,712,219	43.0%	45.9%	37,862,925	16,281,970	17,391,097	43.0%	45.9%	5.00%	0.9819
	2014	29,034	52,486,729	19,681,983	25,735,749	37.5%	49.0%	49,381,342	18,517,495	24,213,089	37.5%	49.0%	5.00%	0.9408
	2015	28,250	53,229,738	23,679,305	28,236,802	44.5%	53.0%	47,695,609	21,217,442	25,301,110	44.5%	53.0%	5.00%	0.8960
	2016	27,433	51,396,003	27,726,206	30,856,949	53.9%	60.0%	43,859,545	23,660,571	26,332,238	53.9%	60.0%	5.00%	0.8534
	2017	26,579	49,508,929	31,361,044	33,864,539	63.3%	68.4%	40,237,317	25,488,014	27,522,676	63.3%	68.4%	5.00%	0.8127
	2018	25,690	47,570,528	34,354,035	37,054,966	72.2%	77.9%	36,820,879	26,590,955	28,681,549	72.2%	77.9%	5.00%	0.7740
	2019	24,767	45,593,047	37,506,451	40,575,112	82.3%	89.0%	33,609,766	27,648,582	29,910,702	82.3%	89.0%	5.00%	0.7372
	2020	23,809	43,576,304	40,713,770	44,652,053	93.4%	102.5%	30,593,416	28,583,730	31,348,662	93.4%	102.5%	5.00%	0.7021
	2021	22,819	41,519,454	44,336,813	49,063,511	106.8%	118.2%	27,761,307	29,645,089	32,805,519	106.8%	118.2%	5.00%	0.6686
	2022	21,799	39,429,776	48,337,929	53,543,713	122.6%	135.8%	25,108,646	30,781,305	34,096,317	122.6%	135.8%	5.00%	0.6368
	2023	20,750	37,316,306	52,631,334	58,190,560	141.0%	155.9%	22,631,239	31,919,352	35,290,858	141.0%	155.9%	5.00%	0.6065
	2024	19,660	35,171,603	57,174,615	62,856,903	162.6%	178.7%	20,314,800	33,023,541	36,305,579	162.6%	178.7%	5.00%	0.5776
	2025	18,528	32,985,934	61,900,789	67,346,486	187.7%	204.2%	18,145,121	34,050,796	37,046,401	187.7%	204.2%	5.00%	0.5501
	2026	17,368	30,772,298	66,771,323	71,879,096	217.0%	233.6%	16,121,362	34,980,964	37,656,885	217.0%	233.6%	5.00%	0.5239
	2027	16,201	28,565,869	71,731,334	76,259,961	251.1%	267.0%	14,252,791	35,789,975	38,049,510	251.1%	267.0%	5.00%	0.4989
	2028	15,027	26,384,538	76,667,262	80,649,629	290.6%	305.7%	12,537,550	36,431,172	38,323,535	290.6%	305.7%	5.00%	0.4752
	2029	13,849	24,228,931	81,599,086	85,180,045	336.8%	351.6%	10,964,988	36,928,289	38,548,879	336.8%	351.6%	5.00%	0.4526
	2030	12,677	22,105,414	86,501,550	89,293,951	391.3%	403.9%	9,527,594	37,282,796	38,486,342	391.3%	403.9%	5.00%	0.4310
	2031	11,525	20,036,250	91,166,431	92,405,851	455.0%	461.2%	8,224,542	37,422,280	37,931,041	455.0%	461.2%	5.00%	0.4105
	2032	10,399	18,033,941	95,213,010	93,858,699	528.0%	520.5%	7,050,122	37,222,221	36,692,772	528.0%	520.5%	5.00%	0.3909
	2033	9,314	16,113,861	98,306,578	93,963,776	610.1%	583.1%	5,999,517	36,601,533	34,984,620	610.1%	583.1%	5.00%	0.3723
	2034	8,282	14,295,367	100,317,717	93,285,411	701.7%	652.6%	5,069,005	35,571,734	33,078,143	701.7%	652.6%	5.00%	0.3546
	2035	7,307	12,590,697	101,348,886	92,145,065	805.0%	731.9%	4,251,947	34,226,073	31,117,892	805.0%	731.9%	5.00%	0.3377
	2036	6,393	11,001,547	101,479,666	89,981,186	922.4%	817.9%	3,538,365	32,638,322	28,940,132	922.4%	817.9%	5.00%	0.3216
	2037	5,548	9,533,781	100,626,411	86,554,600	1055.5%	907.9%	2,920,281	30,822,757	26,512,437	1055.5%	907.9%	5.00%	0.3063
	2038	4,779	8,199,727	98,704,952	82,170,063	1203.8%	1002.1%	2,392,046	28,794,474	23,970,871	1203.8%	1002.1%	5.00%	0.2917
	2039	4,086	7,000,982	95,792,099	77,291,317	1368.3%	1104.0%	1,945,091	26,614,027	21,473,934	1368.3%	1104.0%	5.00%	0.2778
	2040	3,467	5,932,924	92,019,458	71,983,933	1551.0%	1213.3%	1,569,858	24,348,447	19,047,026	1551.0%	1213.3%	5.00%	0.2646
	2041	2,918	4,989,131	87,513,093	66,367,713	1754.1%	1330.2%	1,257,266	22,053,389	16,724,732	1754.1%	1330.2%	5.00%	0.2520
	2042	2,436	4,162,238	82,411,679	60,572,025	1980.0%	1455.3%	998,941	19,778,883	14,537,345	1980.0%	1455.3%	5.00%	0.2400
	2043	2,016	3,444,125	76,858,944	54,722,484	2231.6%	1588.9%	787,232	17,567,830	12,508,047	2231.6%	1588.9%	5.00%	0.2286
	2044	1,654	2,826,111	71,003,829	48,939,218	2512.4%	1731.7%	615,210	15,456,679	10,653,478	2512.4%	1731.7%	5.00%	0.2177
	2045	1,346	2,299,158	64,980,514	43,315,278	2826.3%	1884.0%	476,665	13,471,881	8,980,204	2826.3%	1884.0%	5.00%	0.2073
	2046	1,084	1,854,055	58,911,167	37,942,378	3177.4%	2046.5%	366,082	11,631,974	7,491,699	3177.4%	2046.5%	5.00%	0.1974
2047	866	1,481,664	52,908,271	32,886,815	3570.9%	2219.6%	278,623	9,949,244	6,184,268	3570.9%	2219.6%	5.00%	0.1880	
2048	684	1,173,097	47,070,162	28,199,213	4012.5%	2403.8%	210,093	8,429,909	5,050,265	4012.5%	2403.8%	5.00%	0.1791	
2049	536	919,903	41,481,997	23,915,222	4509.4%	2599.8%	156,903	7,075,344	4,079,081	4509.4%	2599.8%	5.00%	0.1706	
2050	415	714,204	36,209,084	20,048,809	5069.9%	2807.2%	116,017	5,881,880	3,256,771	5069.9%	2807.2%	5.00%	0.1624	
2051	318	548,784	31,299,909	16,606,238	5703.5%	3026.0%	84,901	4,842,308	2,569,097	5703.5%	3026.0%	5.00%	0.1547	
2052	241	417,146	26,788,359	13,584,593	6421.8%	3256.6%	61,462	3,946,991	2,001,551	6421.8%	3256.6%	5.00%	0.1473	
2053	180	313,527	22,694,503	10,968,268	7238.5%	3498.4%	43,995	3,184,574	1,539,107	7238.5%	3498.4%	5.00%	0.1403	
2054	133	232,884	19,026,366	8,738,278	8169.9%	3752.2%	31,123	2,542,712	1,167,797	8169.9%	3752.2%	5.00%	0.1336	
2055	97	170,864	15,781,102	6,865,353	9236.0%	4018.0%	21,747	2,008,581	873,806	9236.0%	4018.0%	5.00%	0.1273	
2056	70	123,753	12,946,242	5,316,601	10461.4%	4296.1%	15,001	1,569,302	644,461	10461.4%	4296.1%	5.00%	0.1212	
2057	50	88,425	10,501,500	4,056,262	11876.2%	4587.2%	10,208	1,212,341	468,273	11876.2%	4587.2%	5.00%	0.1154	
2058	35	62,286	8,420,498	3,046,905	13519.0%	4891.8%	6,848	925,810	334,999	13519.0%	4891.8%	5.00%	0.1099	
2059	24	43,214	6,671,879	2,250,340	15439.3%	5207.5%	4,525	698,623	235,637	15439.3%	5207.5%	5.00%	0.1047	
2060	16	29,496	5,221,691	1,631,959	17703.2%	5532.9%	2,941	520,735	162,748	17703.2%	5532.9%	5.00%	0.0997	
2061	11	19,777	4,034,655	1,159,466	20400.6%	5862.7%	1,878	383,198	110,122	20400.6%	5862.7%	5.00%	0.0950	
2062	7	13,001	3,075,849	805,147	23657.9%	6192.8%	1,176	278,222	72,829	23657.9%	6192.8%	5.00%	0.0905	
Past			617,028,171	77,651,536	116,324,632	12.6%	18.9%	837,931,697	89,717,006	140,399,143	10.7%	16.8%		
Future			849,069,370	2,640,043,946	2,318,530,709	310.9%	273.1%	545,935,809	1,006,494,317	970,706,134	184.4%	177.8%		
Lifetime			1,466,097,542	2,717,695,482	2,434,855,340	185.4%	166.1%	1,383,867,506	1,096,211,323	1,111,105,276	79.2%	80.3%		

**EXHIBIT IX**  
**RiverSource Life Insurance Company**  
**Virginia Experience Projections with No Increase**  
**Policy Form: 30160A-VA, Subject to Endorsement Form 32100**

	Calendar Year	Ending Policies Inforce	Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest					Calendar Year	Mid-Year
			Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Effective Int Rate	Disc / Accum Factor
Historical Experience	2000	510	155,746	0	0	0.0%	0.0%	290,122	0	0	0.0%	0.0%	5.00%	1.8628
	2001	1,213	1,237,228	0	0	0.0%	0.0%	2,194,947	0	0	0.0%	0.0%	5.00%	1.7741
	2002	1,908	2,248,858	1,125	193,326	0.1%	8.6%	3,799,680	1,900	326,644	0.1%	8.6%	5.00%	1.6896
	2003	1,881	2,805,151	48,854	0	1.7%	0.0%	4,513,900	78,614	0	1.7%	0.0%	5.00%	1.6091
	2004	1,839	2,693,828	98,428	334,456	3.7%	12.4%	4,128,347	150,844	512,561	3.7%	12.4%	5.00%	1.5325
	2005	1,810	2,640,938	148,578	791,847	5.6%	30.0%	3,854,565	216,856	1,155,735	5.6%	30.0%	5.00%	1.4595
	2006	1,793	2,599,868	161,913	18,125	6.2%	0.7%	3,613,924	225,066	25,194	6.2%	0.7%	5.00%	1.3900
	2007	1,762	2,583,845	316,816	508,120	12.3%	19.7%	3,420,620	419,417	672,674	12.3%	19.7%	5.00%	1.3238
	2008	1,731	2,684,905	367,590	400,756	13.7%	14.9%	3,385,151	463,460	505,276	13.7%	14.9%	5.00%	1.2608
	2009	1,709	2,686,483	511,612	631,038	19.0%	23.5%	3,225,848	614,328	757,732	19.0%	23.5%	5.00%	1.2008
	2010	1,690	2,644,682	602,590	99,584	22.8%	3.8%	3,024,433	689,116	113,883	22.8%	3.8%	5.00%	1.1436
	2011	1,671	2,609,891	554,233	327,450	21.2%	12.5%	2,842,521	603,634	356,637	21.2%	12.5%	5.00%	1.0891
	2012	1,654	2,652,307	396,403	693,921	14.9%	26.2%	2,751,159	411,177	719,783	14.9%	26.2%	5.00%	1.0373
	1/2013-3/2013	1,647	685,444	81,316	273,905	11.9%	40.0%	689,637	81,814	275,581	11.9%	40.0%	5.00%	1.0061
Projected Future Experience	4/2013-12/2013	1,620	2,068,005	964,048	771,564	46.6%	37.3%	2,030,512	946,570	757,575	46.6%	37.3%	5.00%	0.9819
	2014	1,584	2,695,435	776,369	1,137,512	28.8%	42.2%	2,535,959	730,435	1,070,211	28.8%	42.2%	5.00%	0.9408
	2015	1,546	2,623,076	952,314	1,272,142	36.3%	48.5%	2,350,363	853,305	1,139,882	36.3%	48.5%	5.00%	0.8960
	2016	1,507	2,548,163	1,163,205	1,413,690	45.6%	55.5%	2,174,513	992,638	1,206,394	45.6%	55.5%	5.00%	0.8534
	2017	1,465	2,470,063	1,358,605	1,582,539	55.0%	64.1%	2,007,491	1,104,177	1,286,174	55.0%	64.1%	5.00%	0.8127
	2018	1,422	2,388,659	1,533,825	1,768,125	64.2%	74.0%	1,848,887	1,187,222	1,368,576	64.2%	74.0%	5.00%	0.7740
	2019	1,376	2,304,314	1,719,787	1,975,335	74.6%	85.7%	1,698,668	1,267,773	1,456,155	74.6%	85.7%	5.00%	0.7372
	2020	1,328	2,216,844	1,910,395	2,218,384	86.2%	100.1%	1,556,370	1,341,222	1,557,451	86.2%	100.1%	5.00%	0.7021
	2021	1,278	2,126,260	2,129,388	2,488,726	100.1%	117.0%	1,421,689	1,423,781	1,664,046	100.1%	117.0%	5.00%	0.6686
	2022	1,227	2,032,808	2,374,823	2,767,883	116.8%	136.2%	1,294,480	1,512,273	1,762,571	116.8%	136.2%	5.00%	0.6368
	2023	1,173	1,936,680	2,640,652	3,054,317	136.3%	157.7%	1,174,539	1,601,478	1,852,353	136.3%	157.7%	5.00%	0.6065
	2024	1,116	1,837,303	2,926,371	3,352,374	159.3%	182.5%	1,061,209	1,690,246	1,936,301	159.3%	182.5%	5.00%	0.5776
	2025	1,056	1,734,167	3,224,963	3,644,267	186.0%	210.1%	953,942	1,774,009	2,004,662	186.0%	210.1%	5.00%	0.5501
	2026	994	1,627,900	3,532,956	3,945,946	217.0%	242.4%	852,844	1,850,888	2,067,250	217.0%	242.4%	5.00%	0.5239
	2027	932	1,520,333	3,853,089	4,239,482	253.4%	278.9%	758,562	1,922,479	2,115,268	253.4%	278.9%	5.00%	0.4989
	2028	868	1,412,458	4,177,585	4,542,292	295.8%	321.6%	671,179	1,985,128	2,158,431	295.8%	321.6%	5.00%	0.4752
	2029	803	1,304,367	4,507,608	4,850,308	345.6%	371.9%	590,301	2,039,952	2,195,044	345.6%	371.9%	5.00%	0.4526
	2030	738	1,196,572	4,839,243	5,141,962	404.4%	429.7%	515,731	2,085,749	2,216,223	404.4%	429.7%	5.00%	0.4310
	2031	674	1,090,289	5,163,967	5,383,171	473.6%	493.7%	447,545	2,119,721	2,209,701	473.6%	493.7%	5.00%	0.4105
	2032	610	986,216	5,457,981	5,521,242	553.4%	559.8%	385,548	2,133,723	2,158,454	553.4%	559.8%	5.00%	0.3909
	2033	548	885,327	5,697,360	5,570,632	643.5%	629.2%	329,625	2,121,243	2,074,059	643.5%	629.2%	5.00%	0.3723
	2034	489	788,793	5,873,448	5,578,605	744.6%	707.2%	279,699	2,082,670	1,978,122	744.6%	707.2%	5.00%	0.3546
	2035	433	697,405	5,991,722	5,554,313	859.1%	796.4%	235,517	2,023,437	1,875,722	859.1%	796.4%	5.00%	0.3377
	2036	380	611,474	6,053,396	5,459,249	990.0%	892.8%	196,665	1,946,919	1,755,827	990.0%	892.8%	5.00%	0.3216
	2037	330	531,438	6,051,365	5,279,690	1138.7%	993.5%	162,784	1,853,586	1,617,215	1138.7%	993.5%	5.00%	0.3063
	2038	285	458,156	5,978,756	5,036,036	1305.0%	1099.2%	133,655	1,744,139	1,469,126	1305.0%	1099.2%	5.00%	0.2917
	2039	244	391,861	5,839,743	4,755,380	1490.3%	1213.5%	108,871	1,622,462	1,321,192	1490.3%	1213.5%	5.00%	0.2778
	2040	207	332,419	5,641,616	4,441,974	1697.1%	1336.3%	87,958	1,492,778	1,175,351	1697.1%	1336.3%	5.00%	0.2646
	2041	174	279,593	5,391,225	4,101,025	1928.2%	1466.8%	70,458	1,358,594	1,033,463	1928.2%	1466.8%	5.00%	0.2520
	2042	145	233,082	5,096,233	3,742,093	2186.5%	1605.5%	55,940	1,223,101	898,106	2186.5%	1605.5%	5.00%	0.2400
	2043	120	192,529	4,765,142	3,373,406	2475.0%	1752.2%	44,007	1,089,180	771,067	2475.0%	1752.2%	5.00%	0.2286
	2044	98	157,527	4,408,072	3,005,686	2798.3%	1908.0%	34,292	959,584	654,302	2798.3%	1908.0%	5.00%	0.2177
	2045	79	127,633	4,034,244	2,645,410	3160.8%	2072.7%	26,461	836,387	548,451	3160.8%	2072.7%	5.00%	0.2073
	2046	63	102,376	3,652,165	2,299,083	3567.4%	2245.7%	20,214	721,118	453,953	3567.4%	2245.7%	5.00%	0.1974
2047	50	81,271	3,270,221	1,972,263	4023.8%	2426.8%	15,283	614,955	370,878	4023.8%	2426.8%	5.00%	0.1880	
2048	39	63,835	2,895,776	1,670,206	4536.3%	2616.4%	11,432	518,611	299,121	4536.3%	2616.4%	5.00%	0.1791	
2049	30	49,593	2,535,772	1,395,889	5113.1%	2814.7%	8,459	432,512	238,089	5113.1%	2814.7%	5.00%	0.1706	
2050	23	38,096	2,195,581	1,150,784	5763.3%	3020.8%	6,188	356,655	186,936	5763.3%	3020.8%	5.00%	0.1624	
2051	18	28,923	1,879,331	935,499	6497.6%	3234.4%	4,475	290,745	144,728	6497.6%	3234.4%	5.00%	0.1547	
2052	13	21,694	1,589,986	749,264	7329.3%	3453.8%	3,196	234,268	110,396	7329.3%	3453.8%	5.00%	0.1473	
2053	10	16,067	1,329,254	591,159	8273.4%	3679.4%	2,255	186,526	82,954	8273.4%	3679.4%	5.00%	0.1403	
2054	7	11,744	1,097,960	459,377	9349.3%	3911.7%	1,569	146,733	61,392	9349.3%	3911.7%	5.00%	0.1336	
2055	5	8,467	895,895	351,417	10580.4%	4150.2%	1,078	114,027	44,728	10580.4%	4150.2%	5.00%	0.1273	
2056	4	6,019	722,005	264,408	11994.7%	4392.6%	730	87,519	32,051	11994.7%	4392.6%	5.00%	0.1212	
2057	2	4,217	574,563	195,677	13626.3%	4640.7%	487	66,330	22,590	13626.3%	4640.7%	5.00%	0.1154	
2058	2	2,909	451,419	142,261	15517.6%	4890.3%	320	49,632	15,641	15517.6%	4890.3%	5.00%	0.1099	
2059	1	1,976	350,054	101,546	17719.5%	5140.2%	207	36,655	10,633	17719.5%	5140.2%	5.00%	0.1047	
2060	1	1,320	267,849	71,071	20297.7%	5385.8%	132	26,711	7,088	20297.7%	5385.8%	5.00%	0.0997	
2061	0	866	202,171	48,764	23339.6%	5629.6%	82	19,201	4,631	23339.6%	5629.6%	5.00%	0.0950	
2062	0	558	150,484	32,755	26967.4%	5869.9%	50	13,612	2,963	26967.4%	5869.9%	5.00%	0.0905	
Past			30,929,174	3,289,458	4,272,528	10.6%	13.8%	41,734,856	3,956,226	5,421,701	9.5%	13.0%		
Future			44,247,077	150,089,983	132,046,182	339.2%	298.4%	28,172,420	54,832,660	53,443,496	194.6%	189.7%		
Lifetime			75,176,251	153,379,441	136,318,710	204.0%	181.3%	69,907,276	58,788,886	58,865,197	84.1%	84.2%		

**EXHIBIT IX**  
**RiverSource Life Insurance Company**  
**Virginia Experience Projections with 10% Increase**  
**Policy Form: 30160A-VA, Subject to Endorsement Form 32100**

	Calendar Year	Ending Policies Inforce	Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest					Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
			Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio		
Historical Experience	2000	510	155,746	0	0	0.0%	0.0%	290,122	0	0	0.0%	0.0%	5.00%	1.8628
	2001	1,213	1,237,228	0	0	0.0%	0.0%	2,194,947	0	0	0.0%	0.0%	5.00%	1.7741
	2002	1,908	2,248,858	1,125	193,326	0.1%	8.6%	3,799,680	1,900	326,644	0.1%	8.6%	5.00%	1.6896
	2003	1,881	2,805,151	48,854	0	1.7%	0.0%	4,513,900	78,614	0	1.7%	0.0%	5.00%	1.6091
	2004	1,839	2,693,828	98,428	334,456	3.7%	12.4%	4,128,347	150,844	512,561	3.7%	12.4%	5.00%	1.5325
	2005	1,810	2,640,938	148,578	791,847	5.6%	30.0%	3,854,565	216,856	1,155,735	5.6%	30.0%	5.00%	1.4595
	2006	1,793	2,599,868	161,913	18,125	6.2%	0.7%	3,613,924	225,066	25,194	6.2%	0.7%	5.00%	1.3900
	2007	1,762	2,583,845	316,816	508,120	12.3%	19.7%	3,420,620	419,417	672,674	12.3%	19.7%	5.00%	1.3238
	2008	1,731	2,684,905	367,590	400,756	13.7%	14.9%	3,385,151	463,460	505,276	13.7%	14.9%	5.00%	1.2608
	2009	1,709	2,686,483	511,612	631,038	19.0%	23.5%	3,225,848	614,328	757,732	19.0%	23.5%	5.00%	1.2008
	2010	1,690	2,644,682	602,590	99,584	22.8%	3.8%	3,024,433	689,116	113,883	22.8%	3.8%	5.00%	1.1436
	2011	1,671	2,609,891	554,233	327,450	21.2%	12.5%	2,842,521	603,634	356,637	21.2%	12.5%	5.00%	1.0891
	2012	1,654	2,652,307	396,403	693,921	14.9%	26.2%	2,751,159	411,177	719,783	14.9%	26.2%	5.00%	1.0373
1/2013-3/2013	1,647	685,444	81,316	273,905	11.9%	40.0%	689,637	81,814	275,581	11.9%	40.0%	5.00%	1.0061	
Projected Future Experience	4/2013-12/2013	1,620	2,068,005	964,048	771,564	46.6%	37.3%	2,030,512	946,570	757,575	46.6%	37.3%	5.00%	0.9819
	2014	1,584	2,829,600	776,578	1,139,965	27.4%	40.3%	2,662,186	730,631	1,072,518	27.4%	40.3%	5.00%	0.9408
	2015	1,546	2,885,384	953,605	1,276,521	33.0%	44.2%	2,585,399	854,461	1,143,806	33.0%	44.2%	5.00%	0.8960
	2016	1,507	2,802,979	1,165,666	1,418,251	41.6%	50.6%	2,391,964	994,738	1,210,286	41.6%	50.6%	5.00%	0.8534
	2017	1,465	2,717,070	1,362,004	1,587,317	50.1%	58.4%	2,208,240	1,106,940	1,290,058	50.1%	58.4%	5.00%	0.8127
	2018	1,422	2,627,525	1,537,973	1,773,122	58.5%	67.5%	2,033,775	1,190,433	1,372,445	58.5%	67.5%	5.00%	0.7740
	2019	1,376	2,534,746	1,724,466	1,980,560	68.0%	78.1%	1,868,535	1,271,223	1,460,007	68.0%	78.1%	5.00%	0.7372
	2020	1,328	2,438,529	1,915,502	2,223,862	78.6%	91.2%	1,712,007	1,344,808	1,561,297	78.6%	91.2%	5.00%	0.7021
	2021	1,278	2,338,886	2,134,837	2,494,467	91.3%	106.7%	1,563,858	1,427,424	1,667,885	91.3%	106.7%	5.00%	0.6686
	2022	1,227	2,236,089	2,380,593	2,773,863	106.5%	124.0%	1,423,928	1,515,948	1,766,379	106.5%	124.0%	5.00%	0.6368
	2023	1,173	2,130,348	2,646,728	3,060,507	124.2%	143.7%	1,291,993	1,605,162	1,856,108	124.2%	143.7%	5.00%	0.6065
	2024	1,116	2,021,033	2,932,733	3,358,750	145.1%	166.2%	1,167,330	1,693,920	1,939,983	145.1%	166.2%	5.00%	0.5776
	2025	1,056	1,907,584	3,231,583	3,650,778	169.4%	191.4%	1,049,336	1,777,650	2,008,244	169.4%	191.4%	5.00%	0.5501
	2026	994	1,790,690	3,539,797	3,952,565	197.7%	220.7%	938,128	1,854,472	2,070,717	197.7%	220.7%	5.00%	0.5239
	2027	932	1,672,366	3,860,113	4,246,163	230.8%	253.9%	834,418	1,925,983	2,118,601	230.8%	253.9%	5.00%	0.4989
	2028	868	1,553,703	4,184,756	4,549,020	269.3%	292.8%	738,297	1,988,536	2,161,628	269.3%	292.8%	5.00%	0.4752
	2029	803	1,434,803	4,514,895	4,857,063	314.7%	338.5%	649,331	2,043,250	2,198,101	314.7%	338.5%	5.00%	0.4526
	2030	738	1,316,230	4,846,617	5,148,713	368.2%	391.2%	567,305	2,088,927	2,219,133	368.2%	391.2%	5.00%	0.4310
	2031	674	1,199,318	5,171,392	5,389,845	431.2%	449.4%	492,300	2,122,769	2,212,441	431.2%	449.4%	5.00%	0.4105
	2032	610	1,084,838	5,465,399	5,527,712	503.8%	509.5%	424,103	2,136,623	2,160,983	503.8%	509.5%	5.00%	0.3909
	2033	548	973,860	5,704,692	5,576,798	585.8%	572.6%	362,588	2,123,973	2,076,355	585.8%	572.6%	5.00%	0.3723
	2034	489	867,673	5,880,611	5,584,436	677.7%	643.6%	307,669	2,085,210	1,980,189	677.7%	643.6%	5.00%	0.3546
	2035	433	767,146	5,998,650	5,559,797	781.9%	724.7%	259,069	2,025,777	1,877,574	781.9%	724.7%	5.00%	0.3377
	2036	380	672,621	6,060,035	5,464,347	901.0%	812.4%	216,331	1,949,054	1,757,466	901.0%	812.4%	5.00%	0.3216
	2037	330	584,582	6,057,664	5,284,354	1036.2%	904.0%	179,063	1,855,516	1,618,644	1036.2%	904.0%	5.00%	0.3063
	2038	285	503,972	5,984,668	5,040,246	1187.5%	1000.1%	147,020	1,745,863	1,470,354	1187.5%	1000.1%	5.00%	0.2917
	2039	244	431,047	5,845,230	4,759,142	1356.1%	1104.1%	119,758	1,623,987	1,322,238	1356.1%	1104.1%	5.00%	0.2778
	2040	207	365,660	5,646,657	4,445,302	1544.2%	1215.7%	96,754	1,494,111	1,176,232	1544.2%	1215.7%	5.00%	0.2646
	2041	174	307,552	5,395,807	4,103,936	1754.4%	1334.4%	77,503	1,359,749	1,034,196	1754.4%	1334.4%	5.00%	0.2520
	2042	145	256,390	5,100,355	3,744,610	1989.3%	1460.5%	61,534	1,224,090	898,710	1989.3%	1460.5%	5.00%	0.2400
	2043	120	211,782	4,768,812	3,375,558	2251.8%	1593.9%	48,407	1,090,019	771,559	2251.8%	1593.9%	5.00%	0.2286
	2044	98	173,280	4,411,306	3,007,504	2545.8%	1735.6%	37,721	960,288	654,697	2545.8%	1735.6%	5.00%	0.2177
	2045	79	140,396	4,037,064	2,646,928	2875.5%	1885.3%	29,107	836,972	548,766	2875.5%	1885.3%	5.00%	0.2073
	2046	63	112,613	3,654,600	2,300,336	3245.3%	2042.7%	22,235	721,599	454,200	3245.3%	2042.7%	5.00%	0.1974
2047	50	89,399	3,272,301	1,973,283	3660.3%	2207.3%	16,811	615,346	371,070	3660.3%	2207.3%	5.00%	0.1880	
2048	39	70,219	2,897,534	1,671,028	4126.5%	2379.8%	12,576	518,926	299,268	4126.5%	2379.8%	5.00%	0.1791	
2049	30	54,553	2,537,243	1,396,543	4651.0%	2560.0%	9,305	432,763	238,200	4651.0%	2560.0%	5.00%	0.1706	
2050	23	41,906	2,196,799	1,151,297	5242.3%	2747.4%	6,807	356,853	187,019	5242.3%	2747.4%	5.00%	0.1624	
2051	18	31,816	1,880,328	935,897	5910.1%	2941.6%	4,922	290,899	144,790	5910.1%	2941.6%	5.00%	0.1547	
2052	13	23,863	1,590,794	749,568	6666.4%	3141.1%	3,516	234,387	110,441	6666.4%	3141.1%	5.00%	0.1473	
2053	10	17,673	1,329,902	591,387	7524.9%	3346.2%	2,480	186,617	82,986	7524.9%	3346.2%	5.00%	0.1403	
2054	7	12,918	1,098,473	459,546	8503.4%	3557.4%	1,726	146,802	61,414	8503.4%	3557.4%	5.00%	0.1336	
2055	5	9,314	896,297	351,541	9622.9%	3774.2%	1,185	114,079	44,743	9622.9%	3774.2%	5.00%	0.1273	
2056	4	6,621	722,316	264,497	10909.0%	3994.7%	803	87,557	32,062	10909.0%	3994.7%	5.00%	0.1212	
2057	2	4,638	574,802	195,740	12392.7%	4220.2%	535	66,358	22,597	12392.7%	4220.2%	5.00%	0.1154	
2058	2	3,200	451,600	142,306	14112.6%	4447.1%	352	49,652	15,646	14112.6%	4447.1%	5.00%	0.1099	
2059	1	2,173	350,189	101,576	16114.9%	4674.3%	228	36,669	10,636	16114.9%	4674.3%	5.00%	0.1047	
2060	1	1,452	267,949	71,091	18459.3%	4897.6%	145	26,721	7,090	18459.3%	4897.6%	5.00%	0.0997	
2061	0	953	202,244	48,778	21225.5%	5119.3%	90	19,208	4,633	21225.5%	5119.3%	5.00%	0.0950	
2062	0	614	150,536	32,764	24524.3%	5337.7%	56	13,617	2,964	24524.3%	5337.7%	5.00%	0.0905	
Past			30,929,174	3,289,458	4,272,528	10.6%	13.8%	41,734,856	3,956,226	5,421,701	9.5%	13.0%		
Future			48,329,606	150,274,743	132,210,745	310.9%	273.6%	30,659,243	54,913,129	53,524,935	179.1%	174.6%		
Lifetime			79,258,780	153,564,201	136,483,272	193.8%	172.2%	72,394,098	58,869,355	58,946,635	81.3%	81.4%		

**EXHIBIT X**  
**RiverSource Life Insurance Company**  
**Incurred Loss Ratio Including the Change in Active Life Reserves**  
**Nationwide Experience, without Interest**  
**Policy Form: 30160A, Subject to Endorsement Form 32100**

Calendar Year	(a) Earned Premiums <sup>1</sup>	(b) Incurred Claims	(c) Change in Active Life Reserves	(d) = (b+c)/(a) Loss Ratio
2000	3,318,006	0	5,107,758	153.9%
2001	26,856,424	521,781	8,405,957	33.2%
2002	48,223,494	1,733,934	30,347,643	66.5%
2003	58,081,691	1,472,260	46,913,547	83.3%
2004	55,102,185	4,534,800	57,452,858	112.5%
2005	53,280,360	6,585,885	56,283,231	118.0%
2006	51,930,869	6,028,979	55,810,732	119.1%
2007	50,926,950	11,750,005	66,244,850	153.2%
2008	52,947,252	9,067,876	54,059,116	119.2%
2009	52,314,127	15,602,982	55,652,769	136.2%
2010	51,078,462	13,748,182	56,832,582	138.2%
2011	49,861,552	19,026,800	(38,302,524)	-38.7%
2012	50,194,429	20,918,626	45,838,077	133.0%
1/2013-3/2013	12,912,371	5,332,522	8,456,395	106.8%
Total	617,028,171	116,324,632	509,102,992	101.4%

<sup>1</sup> Premiums reflect the accumulated 21% rate increases as approved in Virginia and implemented from 2007 through 2013 on a nationwide basis.

**EXHIBIT XI**  
**RiverSource Life Insurance Company**  
**Incurred Loss Ratio Including the Change in Active Life Reserves**  
**Virginia Experience, without Interest**  
**Policy Form: 30160A-VA, Subject to Endorsement Form 32100**

Calendar Year	(a) Earned Premiums	(b) Incurred Claims	(c) Change in Active Life Reserves	(d) = (b+c)/(a) Loss Ratio
2000	155,746	0	162,825	104.5%
2001	1,237,228	0	353,274	28.6%
2002	2,248,858	193,326	1,448,086	73.0%
2003	2,805,151	0	2,282,154	81.4%
2004	2,693,828	334,456	2,866,018	118.8%
2005	2,640,938	791,847	2,812,734	136.5%
2006	2,599,868	18,125	2,799,131	108.4%
2007	2,583,845	508,120	4,307,227	186.4%
2008	2,684,905	400,756	3,045,700	128.4%
2009	2,686,483	631,038	3,229,438	143.7%
2010	2,644,682	99,584	3,359,320	130.8%
2011	2,609,891	327,450	(1,992,178)	-63.8%
2012	2,652,307	693,921	2,787,698	131.3%
1/2013-3/2013	685,444	273,905	469,059	108.4%
Total	30,929,174	4,272,528	27,930,486	104.1%

EXHIBIT XII

RiverSource Life Insurance Company  
Current Annual Premiums

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

LIFETIME BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible						Deductible						Deductible					
	20 days			90 days			20 days			90 days			20 days			90 days		
	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage
40	67.76	77.44	87.12	55.66	64.14	72.60	107.70	122.82	137.94	99.22	112.54	125.84	145.20	163.36	181.50	130.68	146.42	162.14
41	67.76	77.44	87.12	55.66	64.14	72.60	107.70	122.82	137.94	99.22	112.54	125.84	145.20	163.36	181.50	130.68	146.42	162.14
42	67.76	77.44	87.12	55.66	64.14	72.60	107.70	122.82	137.94	99.22	112.54	125.84	145.20	163.36	181.50	130.68	146.42	162.14
43	67.76	77.44	87.12	55.66	64.14	72.60	107.70	122.82	137.94	99.22	112.54	125.84	145.20	163.36	181.50	130.68	146.42	162.14
44	67.76	77.44	87.12	55.66	64.14	72.60	107.70	122.82	137.94	99.22	112.54	125.84	145.20	163.36	181.50	130.68	146.42	162.14
45	67.76	77.44	87.12	55.66	64.14	72.60	107.70	122.82	137.94	99.22	112.54	125.84	145.20	163.36	181.50	130.68	146.42	162.14
46	67.76	77.44	87.12	55.66	64.14	72.60	110.12	125.24	140.36	99.22	112.54	125.84	150.04	168.20	186.34	135.52	151.26	166.98
47	68.98	79.26	89.54	56.88	65.96	75.02	116.16	131.90	147.62	102.86	116.78	130.68	156.10	174.86	193.60	140.36	157.30	174.24
48	68.98	79.26	89.54	59.30	68.38	77.44	121.00	137.94	154.88	105.28	119.20	133.10	164.56	183.92	203.28	144.00	161.54	179.08
49	72.60	83.50	94.38	60.50	70.18	79.86	123.42	140.36	157.30	106.48	121.00	135.52	170.62	190.58	210.54	148.84	166.38	183.92
50	72.60	83.50	94.38	62.92	72.60	82.28	127.06	144.60	162.14	108.90	123.42	137.94	182.72	203.90	225.06	152.46	170.62	188.76
51	75.02	87.12	99.22	64.14	74.42	84.70	130.68	148.84	166.98	114.96	130.08	145.20	187.56	208.74	229.90	156.10	174.86	193.60
52	77.44	89.54	101.64	64.14	74.42	84.70	133.10	151.26	169.40	114.96	130.08	145.20	193.60	215.38	237.16	163.36	182.12	200.86
53	78.66	91.36	104.06	70.18	81.08	91.96	136.74	155.50	174.24	118.58	134.32	150.04	199.66	222.04	244.42	166.98	186.34	205.70
54	78.66	91.36	104.06	70.18	81.08	91.96	142.78	162.14	181.50	121.00	136.74	152.46	208.12	231.12	254.10	170.62	190.58	210.54
55	82.28	95.60	108.90	75.02	87.12	99.22	146.42	166.38	186.34	125.84	142.78	159.72	216.60	240.20	263.78	177.88	199.06	220.22
56	88.34	102.26	116.16	77.44	89.54	101.64	156.10	177.28	198.44	134.32	151.86	169.40	229.90	254.10	278.30	191.18	212.96	234.74
57	96.80	111.32	125.84	83.50	96.20	108.90	166.98	188.76	210.54	145.20	163.36	181.50	240.80	265.60	290.40	204.50	226.88	249.26
58	102.86	117.98	133.10	89.54	102.86	116.16	175.46	197.84	220.22	153.68	172.44	191.18	255.32	281.34	307.34	215.38	238.38	261.36
59	108.90	124.64	140.36	95.60	109.52	123.42	188.76	211.76	234.74	164.56	183.92	203.28	268.62	295.24	321.86	228.70	252.30	275.88
60	118.58	135.52	152.46	101.64	116.16	130.68	197.24	220.84	244.42	177.88	199.06	220.22	279.52	306.74	333.96	239.58	263.78	287.98
61	124.64	142.18	159.72	106.48	121.00	135.52	208.12	232.32	256.52	188.76	210.54	232.32	292.82	320.66	348.48	252.90	277.70	302.50
62	130.68	148.84	166.98	110.12	125.24	140.36	219.02	243.82	268.62	197.24	219.62	242.00	303.72	332.16	360.58	267.42	293.44	319.44
63	136.74	155.50	174.24	118.58	134.32	150.04	231.12	257.14	283.14	208.12	231.12	254.10	317.02	346.06	375.10	278.30	304.92	331.54
64	145.20	164.56	183.92	125.84	142.78	159.72	239.58	266.20	292.82	216.60	240.20	263.78	330.34	359.98	389.62	291.62	318.84	346.06
65	153.68	174.86	196.02	131.90	149.44	166.98	254.10	281.94	309.76	231.12	255.92	280.72	344.86	375.72	406.56	303.72	332.16	360.58
66	180.30	202.68	225.06	153.68	172.44	191.18	294.04	323.68	353.32	263.78	290.40	317.02	392.04	424.72	457.38	342.44	373.30	404.14
67	210.54	234.74	258.94	182.72	203.90	225.06	335.18	367.24	399.30	298.88	327.32	355.74	440.44	475.54	510.62	379.94	412.62	445.28
68	239.58	266.20	292.82	205.70	228.70	251.68	375.10	408.98	442.86	335.18	366.04	396.88	485.22	522.12	559.02	418.66	453.76	488.84
69	272.26	300.70	329.12	231.12	255.92	280.72	413.82	450.12	486.42	372.68	405.36	438.02	537.24	577.18	617.10	456.18	493.08	529.98
70	301.30	332.16	363.00	255.32	282.54	309.76	454.96	493.68	532.40	406.56	441.66	476.74	584.44	626.18	667.92	491.26	529.98	568.70
71	327.92	359.98	392.04	279.52	307.96	336.38	496.10	537.24	578.38	440.44	476.74	513.04	629.20	672.76	716.32	529.98	571.12	612.26
72	360.58	394.46	428.34	303.72	334.58	365.42	536.04	579.00	621.94	477.96	516.08	554.18	681.24	727.82	774.40	567.50	610.46	653.40
73	389.62	425.92	462.22	329.12	361.80	394.46	577.18	622.56	667.92	511.84	552.38	592.90	727.22	776.22	825.22	606.22	651.60	696.96
74	417.46	455.58	493.68	353.32	388.42	423.50	617.10	664.30	711.48	546.92	589.28	631.62	774.40	825.22	876.04	643.72	690.92	738.10
75	451.34	491.88	532.40	381.16	418.06	454.96	661.88	712.10	762.30	585.64	630.42	675.18	826.44	880.28	934.12	686.08	736.30	786.50
76	487.64	533.02	578.38	412.62	454.36	496.10	711.48	767.14	822.80	630.42	680.64	730.84	880.88	940.18	999.46	730.84	786.50	842.16
77	526.36	576.58	626.78	444.08	490.66	537.24	763.52	824.62	885.72	672.76	728.42	784.08	937.76	999.98	999.98	778.04	839.14	900.24
78	562.66	617.72	672.76	475.54	526.96	578.38	813.12	879.68	946.22	717.54	778.64	839.74	992.20	999.98	999.98	825.22	891.78	958.32
79	601.38	661.28	721.16	507.00	563.26	619.52	865.16	938.36	999.98	764.72	832.48	900.24	999.98	999.98	999.98	873.62	946.22	999.98

EXHIBIT XII

RiverSource Life Insurance Company  
Current Annual Premiums

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

6 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option							
	Deductible			Deductible			Deductible			Deductible			Deductible			Deductible				
	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days		
	Home Care Percentage	50%	75%	100%	Home Care Percentage	50%	75%	100%	Home Care Percentage	50%	75%	100%	Home Care Percentage	50%	75%	100%	Home Care Percentage	50%	75%	100%
40	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	96.80	108.90	121.00		
41	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	96.80	108.90	121.00		
42	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	96.80	108.90	121.00		
43	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	96.80	108.90	121.00		
44	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	96.80	108.90	121.00		
45	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	96.80	108.90	121.00		
46	55.66	64.14	72.60	48.40	55.66	62.92	79.86	90.76	101.64	67.76	77.44	87.12	116.16	130.68	145.20	99.22	111.32	123.42		
47	56.88	65.96	75.02	48.40	55.66	62.92	84.70	96.80	108.90	70.18	79.86	89.54	119.80	134.92	150.04	102.86	115.56	128.26		
48	56.88	65.96	75.02	49.62	57.48	65.34	88.34	101.04	113.74	73.82	84.10	94.38	122.22	137.34	152.46	105.28	117.98	130.68		
49	58.08	67.76	77.44	49.62	57.48	65.34	93.18	105.88	118.58	76.24	86.52	96.80	125.84	141.58	157.30	111.32	124.64	137.94		
50	60.50	70.18	79.86	53.24	61.72	70.18	96.80	110.12	123.42	79.86	90.76	101.64	128.26	144.00	159.72	117.38	131.30	145.20		
51	61.72	72.00	82.28	53.24	61.72	70.18	100.44	114.36	128.26	79.86	90.76	101.64	133.10	150.04	166.98	119.80	133.72	147.62		
52	61.72	72.00	82.28	53.24	61.72	70.18	102.86	116.78	130.68	82.28	93.18	104.06	137.94	154.88	171.82	123.42	137.94	152.46		
53	62.92	73.82	84.70	54.46	63.54	72.60	106.48	121.00	135.52	87.12	99.22	111.32	141.58	159.12	176.66	125.84	140.36	154.88		
54	62.92	73.82	84.70	54.46	63.54	72.60	110.12	125.24	140.36	91.96	104.06	116.16	144.00	161.54	179.08	129.48	144.60	159.72		
55	67.76	79.86	91.96	58.08	67.76	77.44	116.16	131.90	147.62	95.60	108.30	121.00	147.62	165.78	183.92	137.94	153.68	169.40		
56	72.60	84.70	96.80	60.50	70.18	79.86	123.42	140.36	157.30	101.64	114.96	128.26	156.10	174.86	193.60	145.20	162.14	179.08		
57	78.66	91.36	104.06	64.14	74.42	84.70	129.48	147.02	164.56	107.70	121.62	135.52	166.98	186.34	205.70	153.68	171.22	188.76		
58	84.70	98.02	111.32	70.18	81.08	91.96	140.36	158.52	176.66	118.58	133.10	147.62	180.30	200.26	220.22	164.56	182.72	200.86		
59	88.34	102.26	116.16	77.44	89.54	101.64	146.42	165.18	183.92	124.64	139.76	154.88	189.98	211.16	232.32	173.04	191.80	210.54		
60	96.80	111.32	125.84	81.08	93.78	106.48	154.88	174.24	193.60	135.52	151.26	166.98	203.28	225.06	246.84	183.92	203.28	222.64		
61	101.64	116.16	130.68	83.50	96.20	108.90	163.36	183.32	203.28	142.78	159.72	176.66	211.76	234.14	256.52	192.40	212.36	232.32		
62	105.28	120.40	135.52	89.54	102.86	116.16	170.62	191.80	212.96	148.84	166.38	183.92	220.22	243.22	266.20	204.50	225.68	246.84		
63	111.32	127.06	142.78	95.60	109.52	123.42	179.08	200.86	222.64	159.72	177.88	196.02	233.54	257.14	280.72	212.96	234.74	256.52		
64	121.00	137.94	154.88	99.22	113.74	128.26	187.56	209.94	232.32	165.78	184.54	203.28	244.42	268.62	292.82	223.86	246.24	268.62		
65	127.06	144.60	162.14	105.28	120.40	135.52	197.24	220.84	244.42	175.46	195.42	215.38	257.74	283.76	309.76	232.32	255.32	278.30		
66	146.42	165.18	183.92	123.42	140.36	157.30	223.86	249.88	275.88	203.28	225.06	246.84	292.82	320.66	348.48	257.74	282.54	307.34		
67	168.20	189.38	210.54	142.78	160.94	179.08	254.10	281.94	309.76	231.12	254.72	278.30	327.92	358.78	389.62	285.56	313.40	341.22		
68	187.56	209.94	232.32	157.30	176.66	196.02	281.94	311.58	341.22	257.74	283.76	309.76	363.00	395.68	428.34	315.82	345.46	375.10		
69	208.12	232.32	256.52	179.08	200.86	222.64	308.56	340.62	372.68	284.36	311.58	338.80	400.52	436.22	471.90	343.64	376.32	408.98		
70	227.48	254.10	280.72	198.44	221.44	244.42	338.80	372.68	406.56	312.18	341.22	370.26	433.18	470.70	508.20	373.90	409.60	445.28		
71	246.84	274.68	302.50	215.38	239.58	263.78	367.84	404.14	440.44	341.22	372.68	404.14	470.70	511.24	551.76	401.72	439.24	476.74		
72	267.42	297.06	326.70	237.16	263.78	290.40	393.26	431.38	469.48	365.42	398.10	430.76	505.78	548.14	590.48	429.56	470.10	510.62		
73	287.98	319.44	350.90	254.10	281.94	309.76	422.30	462.84	503.36	396.88	431.98	467.06	540.88	586.26	631.62	457.38	499.74	542.08		
74	308.56	341.84	375.10	273.46	302.50	331.54	452.54	494.90	537.24	422.30	459.20	496.10	575.96	623.16	670.34	485.22	530.60	575.96		
75	332.76	368.46	404.14	292.82	324.28	355.74	482.80	528.18	573.54	450.12	488.84	527.56	615.90	666.12	716.32	516.68	564.48	612.26		
76	373.90	412.02	450.12	333.96	367.84	401.72	538.46	587.46	636.46	505.78	548.14	590.48	672.76	727.22	781.66	573.54	625.58	677.60		
77	416.24	457.38	498.52	376.32	413.22	450.12	592.90	644.94	696.96	561.44	607.42	653.40	732.06	790.74	849.42	632.84	689.10	745.36		
78	457.38	500.94	544.50	418.66	458.60	498.52	652.20	708.46	764.72	620.74	670.96	721.16	791.34	854.26	917.18	692.12	752.62	813.12		
79	503.36	550.56	597.74	463.44	506.40	549.34	710.28	770.18	830.06	678.82	732.66	786.50	849.42	915.98	982.52	749.00	813.74	878.46		

EXHIBIT XII

RiverSource Life Insurance Company  
Current Annual Premiums

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

4 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible			Deductible			Deductible			Deductible			Deductible			Deductible		
	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days
	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage
	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%
40	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
41	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
42	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
43	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
44	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
45	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
46	45.98	53.24	60.50	32.68	38.12	43.56	67.76	77.44	87.12	55.66	64.14	72.60	104.06	116.16	128.26	91.96	101.64	111.32
47	45.98	53.24	60.50	32.68	38.12	43.56	70.18	79.86	89.54	55.66	64.14	72.60	108.90	121.00	133.10	91.96	101.64	111.32
48	47.20	55.06	62.92	33.88	39.94	45.98	71.40	81.68	91.96	58.08	66.56	75.02	110.12	122.82	135.52	95.60	105.88	116.16
49	49.62	57.48	65.34	36.30	42.36	48.40	73.82	84.10	94.38	59.30	68.38	77.44	112.54	125.24	137.94	95.60	105.88	116.16
50	50.82	59.30	67.76	38.72	45.98	53.24	77.44	88.34	99.22	61.72	70.80	79.86	116.16	129.48	142.78	99.22	110.12	121.00
51	50.82	59.30	67.76	38.72	45.98	53.24	77.44	88.34	99.22	61.72	70.80	79.86	116.16	129.48	142.78	99.22	110.12	121.00
52	53.24	61.72	70.18	43.56	50.82	58.08	79.86	90.76	101.64	62.92	72.60	82.28	118.58	131.90	145.20	99.22	110.12	121.00
53	54.46	63.54	72.60	44.78	52.64	60.50	82.28	94.38	106.48	67.76	77.44	87.12	119.80	133.72	147.62	104.06	116.16	128.26
54	54.46	63.54	72.60	44.78	52.64	60.50	84.70	96.80	108.90	67.76	77.44	87.12	122.22	136.14	150.04	104.06	116.16	128.26
55	58.08	67.76	77.44	48.40	56.88	65.34	88.34	101.04	113.74	71.40	81.68	91.96	125.84	140.36	154.88	110.12	122.82	135.52
56	60.50	70.18	79.86	50.82	59.30	67.76	96.80	110.12	123.42	77.44	88.34	99.22	134.32	149.44	164.56	116.16	129.48	142.78
57	64.14	74.42	84.70	54.46	63.54	72.60	102.86	116.78	130.68	84.70	96.80	108.90	140.36	156.10	171.82	122.22	136.14	150.04
58	70.18	81.08	91.96	58.08	67.76	77.44	108.90	123.42	137.94	93.18	105.88	118.58	151.26	168.80	186.34	128.26	142.78	157.30
59	77.44	89.54	101.64	61.72	72.00	82.28	117.38	132.50	147.62	99.22	112.54	125.84	159.72	177.88	196.02	140.36	156.10	171.82
60	81.08	93.78	106.48	70.18	81.08	91.96	125.84	142.78	159.72	108.90	123.42	137.94	169.40	188.76	208.12	147.62	164.56	181.50
61	84.70	98.02	111.32	72.60	83.50	94.38	131.90	149.44	166.98	117.38	132.50	147.62	175.46	195.42	215.38	153.68	171.22	188.76
62	90.76	104.68	118.58	77.44	89.54	101.64	140.36	158.52	176.66	123.42	139.16	154.88	185.14	206.32	227.48	165.78	184.54	203.28
63	96.80	111.32	125.84	81.08	93.78	106.48	146.42	165.18	183.92	130.68	147.62	164.56	194.82	217.20	239.58	171.82	191.18	210.54
64	100.44	115.56	130.68	84.70	98.02	111.32	152.46	171.82	191.18	139.16	156.70	174.24	200.86	223.86	246.84	180.30	200.26	220.22
65	106.48	122.22	137.94	90.76	104.68	118.58	165.78	186.96	208.12	148.84	167.60	186.34	212.96	237.16	261.36	191.18	212.96	234.74
66	124.64	142.18	159.72	105.28	120.40	135.52	187.56	209.94	232.32	168.20	188.16	208.12	239.58	266.20	292.82	214.18	237.78	261.36
67	142.78	162.14	181.50	123.42	140.36	157.30	210.54	234.74	258.94	192.40	214.78	237.16	267.42	295.86	324.28	240.80	266.82	292.82
68	158.52	179.70	200.86	140.36	158.52	176.66	237.16	263.78	290.40	214.18	237.78	261.36	298.88	329.74	360.58	266.20	294.04	321.86
69	176.66	199.66	222.64	152.46	171.82	191.18	260.16	288.60	317.02	235.96	261.98	287.98	327.92	361.20	394.46	296.46	327.32	358.16
70	194.82	219.62	244.42	171.82	193.60	215.38	286.78	317.64	348.48	258.94	286.78	314.60	356.96	392.66	428.34	321.86	354.54	387.20
71	212.96	239.58	266.20	188.76	211.76	234.74	309.76	342.44	375.10	280.72	309.76	338.80	384.78	422.30	459.80	346.06	381.16	416.24
72	228.70	257.14	285.56	200.86	225.06	249.26	333.96	369.06	404.14	302.50	333.96	365.42	415.04	455.58	496.10	372.68	410.20	447.70
73	245.64	275.28	304.92	219.02	245.04	271.04	359.38	396.28	433.18	324.28	356.96	389.62	442.86	485.22	527.56	399.30	439.24	479.16
74	265.00	297.06	329.12	235.96	263.18	290.40	384.78	423.50	462.22	348.48	383.58	418.66	474.32	519.10	563.86	424.72	466.46	508.20
75	285.56	319.44	353.32	254.10	283.14	312.18	411.40	452.54	493.68	371.48	408.38	445.28	503.36	550.56	597.74	454.96	499.74	544.50
76	325.50	362.40	399.30	291.62	323.68	355.74	454.96	499.74	544.50	415.04	455.58	496.10	548.14	599.56	650.98	499.74	548.74	597.74
77	363.00	402.94	442.86	331.54	366.64	401.72	499.74	547.54	595.32	459.80	503.36	546.92	592.90	648.56	704.22	543.30	595.94	648.56
78	404.14	446.50	488.84	372.68	410.20	447.70	546.92	598.96	650.98	507.00	554.80	602.58	640.10	700.00	759.88	590.48	647.36	704.22
79	445.28	491.26	537.24	413.82	454.96	496.10	592.90	648.56	704.22	552.98	604.40	655.82	684.86	749.00	813.12	635.26	696.36	757.46
80				454.96	498.52					600.16	655.82					682.44	747.78	
81				494.90	541.48					648.56	707.86					727.22	796.80	
82				538.46	588.68					695.76	759.28					774.40	848.22	
83				582.02	635.86					742.94	810.70					821.60	899.64	
84				621.94	678.82					788.92	860.32					868.78	951.06	

EXHIBIT XII

RiverSource Life Insurance Company  
Current Annual Premiums

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

2 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible						Deductible						Deductible					
	20 days			90 days			20 days			90 days			20 days			90 days		
	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage
40	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
41	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
42	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
43	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
44	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
45	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
46	32.68	38.12	43.56	25.42	29.66	33.88	52.04	59.90	67.76	41.14	47.20	53.24	73.82	82.90	91.96	59.30	67.16	75.02
47	32.68	38.12	43.56	25.42	29.66	33.88	54.46	62.32	70.18	43.56	49.62	55.66	77.44	87.12	96.80	64.14	72.00	79.86
48	33.88	39.94	45.98	26.62	31.46	36.30	55.66	64.14	72.60	45.98	53.24	60.50	77.44	87.12	96.80	67.76	76.24	84.70
49	33.88	39.94	45.98	26.62	31.46	36.30	58.08	66.56	75.02	48.40	55.66	62.92	81.08	91.36	101.64	67.76	76.24	84.70
50	38.72	45.98	53.24	30.26	35.70	41.14	61.72	70.80	79.86	52.04	59.90	67.76	81.08	91.36	101.64	71.40	80.48	89.54
51	38.72	45.98	53.24	30.26	35.70	41.14	61.72	70.80	79.86	52.04	59.90	67.76	84.70	95.60	106.48	73.82	82.90	91.96
52	38.72	45.98	53.24	30.26	35.70	41.14	66.56	75.64	84.70	54.46	62.32	70.18	84.70	95.60	106.48	73.82	82.90	91.96
53	39.94	47.80	55.66	31.46	37.52	43.56	67.76	77.44	87.12	55.66	64.14	72.60	91.96	104.06	116.16	77.44	87.12	96.80
54	39.94	47.80	55.66	31.46	37.52	43.56	70.18	79.86	89.54	58.08	66.56	75.02	91.96	104.06	116.16	79.86	89.54	99.22
55	45.98	54.46	62.92	36.30	43.56	50.82	73.82	84.10	94.38	61.72	70.80	79.86	95.60	108.30	121.00	83.50	93.78	104.06
56	48.40	56.88	65.34	36.30	43.56	50.82	76.24	86.52	96.80	66.56	75.64	84.70	99.22	112.54	125.84	89.54	100.44	111.32
57	52.04	61.12	70.18	39.94	47.80	55.66	82.28	93.18	104.06	72.60	82.28	91.96	105.28	119.20	133.10	94.38	106.48	118.58
58	55.66	65.34	75.02	45.98	54.46	62.92	87.12	99.22	111.32	76.24	86.52	96.80	113.74	128.26	142.78	100.44	113.14	125.84
59	59.30	69.58	79.86	48.40	56.88	65.34	95.60	108.30	121.00	82.28	93.18	104.06	119.80	134.92	150.04	104.06	117.38	130.68
60	65.34	76.24	87.12	52.04	61.12	70.18	99.22	112.54	125.84	87.12	99.22	111.32	125.84	141.58	157.30	112.54	126.46	140.36
61	70.18	81.08	91.96	55.66	65.34	75.02	105.28	119.20	133.10	95.60	108.30	121.00	133.10	150.04	166.98	116.16	130.68	145.20
62	75.02	87.12	99.22	58.08	67.76	77.44	108.90	123.42	137.94	99.22	112.54	125.84	141.58	159.12	176.66	119.80	134.92	150.04
63	78.66	91.36	104.06	61.72	72.00	82.28	117.38	132.50	147.62	105.28	119.20	133.10	147.62	165.78	183.92	125.84	141.58	157.30
64	82.28	95.60	108.90	65.34	76.24	87.12	121.00	136.74	152.46	108.90	123.42	137.94	153.68	172.44	191.18	130.68	147.62	164.56
65	88.34	102.26	116.16	72.60	84.70	96.80	128.26	145.20	162.14	117.38	132.50	147.62	162.14	181.50	200.86	139.16	156.70	174.24
66	100.44	115.56	130.68	82.28	95.60	108.90	142.78	160.94	179.08	128.26	145.20	162.14	182.72	203.90	225.06	151.26	170.02	188.76
67	111.32	128.26	145.20	91.96	106.48	121.00	154.88	174.24	193.60	140.36	158.52	176.66	199.66	222.04	244.42	165.78	185.74	205.70
68	125.84	144.00	162.14	104.06	119.80	135.52	171.82	193.60	215.38	150.04	169.40	188.76	220.22	244.42	268.62	180.30	202.68	225.06
69	135.52	154.88	174.24	114.96	132.50	150.04	186.34	209.34	232.32	160.94	182.12	203.28	240.80	266.82	292.82	194.82	218.42	242.00
70	152.46	174.24	196.02	127.06	145.82	164.56	202.08	226.88	251.68	173.04	195.42	217.80	261.36	289.20	317.02	211.76	237.78	263.78
71	162.14	185.14	208.12	136.74	156.70	176.66	217.80	244.42	271.04	182.72	206.32	229.90	280.72	309.76	338.80	223.86	251.08	278.30
72	174.24	198.44	222.64	150.04	171.82	193.60	229.90	257.74	285.56	194.82	219.62	244.42	301.30	332.16	363.00	238.38	266.82	295.24
73	187.56	213.58	239.58	159.72	182.72	205.70	245.64	275.28	304.92	205.70	232.32	258.94	321.86	354.54	387.20	252.90	283.76	314.60
74	199.66	226.88	254.10	171.82	196.02	220.22	261.36	292.82	324.28	217.80	245.64	273.46	341.22	375.10	408.98	267.42	299.48	331.54
75	212.96	242.00	271.04	185.14	211.16	237.16	277.10	310.38	343.64	227.48	256.52	285.56	363.00	399.30	435.60	285.56	319.44	353.32
76	243.22	275.28	307.34	211.76	240.20	268.62	302.50	338.80	375.10	252.90	284.96	317.02	392.04	430.76	469.48	315.82	352.72	389.62
77	273.46	308.56	343.64	244.42	275.88	307.34	331.54	370.26	408.98	280.72	315.82	350.90	422.30	464.04	505.78	346.06	386.00	425.92
78	303.72	341.84	379.94	275.88	310.98	346.06	356.96	398.70	440.44	304.92	342.44	379.94	454.96	499.74	544.50	377.52	419.88	462.22
79	333.96	375.10	416.24	302.50	340.02	377.52	386.00	431.38	476.74	336.38	377.52	418.66	484.00	531.20	578.38	407.78	453.16	498.52
80				336.38	377.52					360.58	404.14					436.82	484.62	
81				365.42	408.98					388.42	435.00					469.48	520.30	
82				396.88	444.08					417.46	467.68					499.74	553.58	
83				430.76	481.58					446.50	500.34					531.20	587.46	
84				462.22	516.68					476.74	533.62					561.44	620.74	

EXHIBIT XIII

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

LIFETIME BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible			Deductible			Deductible			Deductible			Deductible			Deductible		
	20 days		100%	90 days		100%	20 days		100%	90 days		100%	20 days		100%	90 days		100%
40	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
41	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
42	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
43	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
44	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
45	74.54	85.18	95.84	61.22	70.56	79.86	118.48	135.10	151.74	109.14	123.80	138.42	159.72	179.70	199.66	143.74	161.06	178.36
46	74.54	85.18	95.84	61.22	70.56	79.86	121.14	137.76	154.40	109.14	123.80	138.42	165.04	185.02	204.98	149.08	166.38	183.68
47	75.88	87.18	98.50	62.56	72.56	82.52	127.78	145.10	162.38	113.14	128.46	143.74	171.72	192.34	212.96	154.40	173.04	191.66
48	75.88	87.18	98.50	65.24	75.22	85.18	133.10	151.74	170.36	115.80	131.12	146.42	181.02	202.32	223.60	158.40	177.70	196.98
49	79.86	91.86	103.82	66.56	77.20	87.84	135.76	154.40	173.04	117.12	133.10	149.08	187.68	209.64	231.60	163.72	183.02	202.32
50	79.86	91.86	103.82	69.22	79.86	90.50	139.76	159.06	178.36	119.80	135.76	151.74	201.00	224.30	247.56	167.70	187.68	207.64
51	82.52	95.84	109.14	70.56	81.86	93.18	143.74	163.72	183.68	126.46	143.08	159.72	206.32	229.62	252.90	171.72	192.34	212.96
52	85.18	98.50	111.80	70.56	81.86	93.18	146.42	166.38	186.34	126.46	143.08	159.72	212.96	236.92	260.88	179.70	200.34	220.94
53	86.52	100.50	114.46	77.20	89.18	101.16	150.42	171.06	191.66	130.44	147.76	165.04	219.62	244.24	268.86	183.68	204.98	226.28
54	86.52	100.50	114.46	77.20	89.18	101.16	157.06	178.36	199.66	133.10	150.42	167.70	228.94	254.24	279.52	187.68	209.64	231.60
55	90.50	105.16	119.80	82.52	95.84	109.14	161.06	183.02	204.98	138.42	157.06	175.70	238.26	264.22	290.16	195.66	218.96	242.24
56	97.18	112.48	127.78	85.18	98.50	111.80	171.72	195.00	218.28	147.76	167.04	186.34	252.90	279.52	306.14	210.30	234.26	258.22
57	106.48	122.46	138.42	91.86	105.82	119.80	183.68	207.64	231.60	159.72	179.70	199.66	264.88	292.16	319.44	224.96	249.56	274.18
58	113.14	129.78	146.42	98.50	113.14	127.78	193.00	217.62	242.24	169.04	189.68	210.30	280.86	309.48	338.08	236.92	262.22	287.50
59	119.80	137.10	154.40	105.16	120.48	135.76	207.64	232.94	258.22	181.02	202.32	223.60	295.48	324.76	354.04	251.58	277.54	303.46
60	130.44	149.08	167.70	111.80	127.78	143.74	216.96	242.92	268.86	195.66	218.96	242.24	307.48	337.42	367.36	263.54	290.16	316.78
61	137.10	156.40	175.70	117.12	133.10	149.08	228.94	255.56	282.18	207.64	231.60	255.56	322.10	352.72	383.32	278.20	305.48	332.76
62	143.74	163.72	183.68	121.14	137.76	154.40	240.92	268.20	295.48	216.96	241.58	266.20	334.10	365.38	396.64	294.16	322.78	351.38
63	150.42	171.06	191.66	130.44	147.76	165.04	254.24	282.86	311.46	228.94	254.24	279.52	348.72	380.66	412.62	306.14	335.42	364.70
64	159.72	181.02	202.32	138.42	157.06	175.70	263.54	292.82	322.10	238.26	264.22	290.16	363.38	395.98	428.58	320.78	350.72	380.66
65	169.04	192.34	215.62	145.10	164.38	183.68	279.52	310.14	340.74	254.24	281.52	308.80	379.34	413.30	447.22	334.10	365.38	396.64
66	198.34	222.94	247.56	169.04	189.68	210.30	323.44	356.04	388.66	290.16	319.44	348.72	431.24	467.20	503.12	376.68	410.64	444.56
67	231.60	258.22	284.84	201.00	224.30	247.56	368.70	403.96	439.24	328.76	360.06	391.32	484.48	523.10	561.68	417.94	453.88	489.80
68	263.54	292.82	322.10	226.28	251.58	276.84	412.62	449.88	487.14	368.70	402.64	436.56	533.74	574.34	614.92	460.52	499.14	537.72
69	299.48	330.78	362.04	254.24	281.52	308.80	455.20	495.14	535.06	409.94	445.90	481.82	590.96	634.90	678.82	501.80	542.38	582.98
70	331.44	365.38	399.30	280.86	310.80	340.74	500.46	543.04	585.64	447.22	485.82	524.42	642.88	688.80	734.72	540.38	582.98	625.58
71	360.72	395.98	431.24	307.48	338.76	370.02	545.72	590.96	636.22	484.48	524.42	564.34	692.12	740.04	787.96	582.98	628.24	673.48
72	396.64	433.90	471.18	334.10	368.04	401.96	589.64	636.90	684.14	525.76	567.68	609.60	749.36	800.60	851.84	624.26	671.50	718.74
73	428.58	468.52	508.44	362.04	397.98	433.90	634.90	684.82	734.72	563.02	607.62	652.20	799.94	853.84	907.74	666.84	716.76	766.66
74	459.20	501.14	543.04	388.66	427.26	465.86	678.82	730.74	782.62	601.62	648.20	694.78	851.84	907.74	963.64	708.10	760.02	811.92
75	496.48	541.06	585.64	419.28	459.86	500.46	728.06	783.32	838.54	644.20	693.46	742.70	909.08	968.30	1027.58	754.68	809.94	865.16
76	536.40	586.32	636.22	453.88	499.80	545.72	782.62	843.86	905.08	693.46	748.70	803.92	968.96	1027.58	1087.00	803.92	865.16	926.38
77	579.00	634.24	689.46	488.48	539.72	590.96	839.88	907.08	974.30	740.04	801.26	862.48	999.98	1059.98	1120.98	855.84	923.06	990.26
78	618.92	679.50	740.04	523.10	579.66	636.22	894.44	967.64	1039.98	789.30	856.50	923.72	999.98	1059.98	1120.98	907.74	980.96	1051.98
79	661.52	727.40	793.28	557.70	619.58	681.48	951.68	1024.98	1099.98	841.20	915.72	990.26	999.98	1059.98	1120.98	960.98	1031.98	1102.98

EXHIBIT XIII

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

6 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible			Deductible			Deductible			Deductible			Deductible			Deductible		
	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days
	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage	Home Care	Percentage
40	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
41	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
42	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
43	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
44	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
45	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	106.48	119.80	133.10
46	61.22	70.56	79.86	53.24	61.22	69.22	87.84	99.84	111.80	74.54	85.18	95.84	127.78	143.74	159.72	109.14	122.46	135.76
47	62.56	72.56	82.52	53.24	61.22	69.22	93.18	106.48	119.80	77.20	87.84	98.50	131.78	148.42	165.04	113.14	127.12	141.08
48	62.56	72.56	82.52	54.58	63.22	71.88	97.18	111.14	125.12	81.20	92.52	103.82	134.44	151.08	167.70	115.80	129.78	143.74
49	63.88	74.54	85.18	54.58	63.22	71.88	102.50	116.46	130.44	83.86	95.18	106.48	138.42	155.74	173.04	122.46	137.10	151.74
50	66.56	77.20	87.84	58.56	67.90	77.20	106.48	121.14	135.76	87.84	99.84	111.80	141.08	158.40	175.70	129.12	144.44	159.72
51	67.90	79.20	90.50	58.56	67.90	77.20	110.48	125.80	141.08	87.84	99.84	111.80	146.42	165.04	183.68	131.78	147.10	162.38
52	67.90	79.20	90.50	58.56	67.90	77.20	113.14	128.46	143.74	90.50	102.50	114.46	151.74	170.36	189.00	135.76	151.74	167.70
53	69.22	81.20	93.18	59.90	69.90	79.86	117.12	133.10	149.08	95.84	109.14	122.46	155.74	175.04	194.32	138.42	154.40	170.36
54	69.22	81.20	93.18	59.90	69.90	79.86	121.14	137.76	154.40	101.16	114.46	127.78	158.40	177.70	196.98	142.42	159.06	175.70
55	74.54	87.84	101.16	63.88	74.54	85.18	127.78	145.10	162.38	105.16	119.14	133.10	162.38	182.36	202.32	151.74	169.04	186.34
56	79.86	93.18	106.48	66.56	77.20	87.84	135.76	154.40	173.04	111.80	126.46	141.08	171.72	192.34	212.96	159.72	178.36	196.98
57	86.52	100.50	114.46	70.56	81.86	93.18	142.42	161.72	181.02	118.48	133.78	149.08	183.68	204.98	226.28	169.04	188.34	207.64
58	93.18	107.82	122.46	77.20	89.18	101.16	154.40	174.38	194.32	130.44	146.42	162.38	198.34	220.28	242.24	181.02	201.00	220.94
59	97.18	112.48	127.78	85.18	98.50	111.80	161.06	181.70	202.32	137.10	153.74	170.36	208.98	232.28	255.56	190.34	210.98	231.60
60	106.48	122.46	138.42	89.18	103.16	117.12	170.36	191.66	212.96	149.08	166.38	183.68	223.60	247.56	271.52	202.32	223.60	244.90
61	111.80	127.78	143.74	91.86	105.82	119.80	179.70	201.66	223.60	157.06	175.70	194.32	232.94	257.56	282.18	211.64	233.60	255.56
62	115.80	132.44	149.08	98.50	113.14	127.78	187.68	210.98	234.26	163.72	183.02	202.32	242.24	267.54	292.82	224.96	248.24	271.52
63	122.46	139.76	157.06	105.16	120.48	135.76	196.98	220.94	244.90	175.70	195.66	215.62	256.90	282.86	308.80	234.26	258.22	282.18
64	133.10	151.74	170.36	109.14	125.12	141.08	206.32	230.94	255.56	182.36	203.00	223.60	268.86	295.48	322.10	246.24	270.86	295.48
65	139.76	159.06	178.36	115.80	132.44	149.08	216.96	242.92	268.86	193.00	214.96	236.92	283.52	312.14	340.74	255.56	280.86	306.14
66	161.06	181.70	202.32	135.76	154.40	173.04	246.24	274.86	303.46	223.60	247.56	271.52	322.10	352.72	383.32	283.52	310.80	338.08
67	185.02	208.32	231.60	157.06	177.04	196.98	279.52	310.14	340.74	254.24	280.20	306.14	360.72	394.66	428.58	314.12	344.74	375.34
68	206.32	230.94	255.56	173.04	194.32	215.62	310.14	342.74	375.34	283.52	312.14	340.74	399.30	435.24	471.18	347.40	380.00	412.62
69	228.94	255.56	282.18	196.98	220.94	244.90	339.42	374.68	409.94	312.80	342.74	372.68	440.58	479.84	519.10	378.00	413.96	449.88
70	250.22	279.52	308.80	218.28	243.58	268.86	372.68	409.94	447.22	343.40	375.34	407.28	476.50	517.78	559.02	411.30	450.56	489.80
71	271.52	302.14	332.76	236.92	263.54	290.16	404.62	444.56	484.48	375.34	409.94	444.56	517.78	562.36	606.94	441.90	483.16	524.42
72	294.16	326.76	359.38	260.88	290.16	319.44	432.58	474.52	516.42	401.96	437.92	473.84	556.36	602.96	649.52	472.52	517.12	561.68
73	316.78	351.38	386.00	279.52	310.14	340.74	464.54	509.12	553.70	436.56	475.18	513.76	594.96	644.88	694.78	503.12	549.72	596.28
74	339.42	376.02	412.62	300.80	332.76	364.70	497.80	544.40	590.96	464.54	505.12	545.72	633.56	685.48	737.38	533.74	583.66	633.56
75	366.04	405.30	444.56	322.10	356.70	391.32	531.08	581.00	630.90	495.14	537.72	580.32	677.50	732.74	787.96	568.34	620.92	673.48
76	411.30	453.22	495.14	367.36	404.62	441.90	592.30	646.20	700.10	556.36	602.96	649.52	740.04	799.94	859.82	630.90	688.14	745.36
77	457.86	503.12	548.38	413.96	454.54	495.14	652.20	709.44	766.66	617.58	668.16	718.74	805.26	869.82	934.36	696.12	758.02	819.90
78	503.12	551.04	598.96	460.52	504.46	548.38	717.42	779.30	841.20	682.82	738.06	793.28	870.48	939.68	999.98	761.34	827.88	894.44
79	553.70	605.62	657.52	509.78	557.04	604.28	781.30	847.20	913.06	746.70	805.92	865.16	934.36	999.98	999.98	823.90	895.12	966.30

EXHIBIT XIII

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

4 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible						Deductible						Deductible					
	20 days			90 days			20 days			90 days			20 days			90 days		
	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage	Home	Care	Percentage
	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%
40	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
41	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
42	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
43	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
44	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
45	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
46	50.58	58.56	66.56	35.94	41.94	47.92	74.54	85.18	95.84	61.22	70.56	79.86	114.46	127.78	141.08	101.16	111.80	122.46
47	50.58	58.56	66.56	35.94	41.94	47.92	77.20	87.84	98.50	61.22	70.56	79.86	119.80	133.10	146.42	101.16	111.80	122.46
48	51.92	60.56	69.22	37.26	43.94	50.58	78.54	89.84	101.16	63.88	73.22	82.52	121.14	135.10	149.08	105.16	116.46	127.78
49	54.58	63.22	71.88	39.94	46.60	53.24	81.20	92.52	103.82	65.24	75.22	85.18	123.80	137.76	151.74	105.16	116.46	127.78
50	55.90	65.24	74.54	42.60	50.58	58.56	85.18	97.18	109.14	67.90	77.88	87.84	127.78	142.42	157.06	109.14	121.14	133.10
51	55.90	65.24	74.54	42.60	50.58	58.56	85.18	97.18	109.14	67.90	77.88	87.84	127.78	142.42	157.06	109.14	121.14	133.10
52	58.56	67.90	77.20	47.92	55.90	63.88	87.84	99.84	111.80	69.22	79.86	90.50	130.44	145.10	159.72	109.14	121.14	133.10
53	59.90	69.90	79.86	49.26	57.90	66.56	90.50	103.82	117.12	74.54	85.18	95.84	131.78	147.10	162.38	114.46	127.78	141.08
54	59.90	69.90	79.86	49.26	57.90	66.56	93.18	106.48	119.80	74.54	85.18	95.84	134.44	149.76	165.04	114.46	127.78	141.08
55	63.88	74.54	85.18	53.24	62.56	71.88	97.18	111.14	125.12	78.54	89.84	101.16	138.42	154.40	170.36	121.14	135.10	149.08
56	66.56	77.20	87.84	55.90	65.24	74.54	106.48	121.14	135.76	85.18	97.18	109.14	147.76	164.38	181.02	127.78	142.42	157.06
57	70.56	81.86	93.18	59.90	69.90	79.86	113.14	128.46	143.74	93.18	106.48	119.80	154.40	171.72	189.00	134.44	149.76	165.04
58	77.20	89.18	101.16	63.88	74.54	85.18	119.80	135.76	151.74	102.50	116.46	130.44	166.38	185.68	204.98	141.08	157.06	173.04
59	85.18	98.50	111.80	67.90	79.20	90.50	129.12	145.76	162.38	109.14	123.80	138.42	175.70	195.66	215.62	154.40	171.72	189.00
60	89.18	103.16	117.12	77.20	89.18	101.16	138.42	157.06	175.70	119.80	135.76	151.74	186.34	207.64	228.94	162.38	181.02	199.66
61	93.18	107.82	122.46	79.86	91.86	103.82	145.10	164.38	183.68	129.12	145.76	162.38	193.00	214.96	236.92	169.04	188.34	207.64
62	99.84	115.14	130.44	85.18	98.50	111.80	154.40	174.38	194.32	135.76	153.08	170.36	203.66	226.96	250.22	182.36	203.00	223.60
63	106.48	122.46	138.42	89.18	103.16	117.12	161.06	181.70	202.32	143.74	162.38	181.02	214.30	238.92	263.54	189.00	210.30	231.60
64	110.48	127.12	143.74	93.18	107.82	122.46	167.70	189.00	210.30	153.08	172.38	191.66	220.94	246.24	271.52	198.34	220.28	242.24
65	117.12	134.44	151.74	99.84	115.14	130.44	182.36	205.66	228.94	163.72	184.36	204.98	234.26	260.88	287.50	210.30	234.26	258.22
66	137.10	156.40	175.70	115.80	132.44	149.08	206.32	230.94	255.56	185.02	206.98	228.94	263.54	292.82	322.10	235.60	261.56	287.50
67	157.06	178.36	199.66	135.76	154.40	173.04	231.60	258.22	284.84	211.64	236.26	260.88	294.16	325.44	356.70	264.88	293.50	322.10
68	174.38	197.68	220.94	154.40	174.38	194.32	260.88	290.16	319.44	235.60	261.56	287.50	328.76	362.72	396.64	292.82	323.44	354.04
69	194.32	219.62	244.90	167.70	189.00	210.30	286.18	317.46	348.72	259.56	288.18	316.78	360.72	397.32	433.90	326.10	360.06	393.98
70	214.30	241.58	268.86	189.00	212.96	236.92	315.46	349.40	383.32	284.84	315.46	346.06	392.66	431.92	471.18	354.04	390.00	425.92
71	234.26	263.54	292.82	207.64	232.94	258.22	340.74	376.68	412.62	308.80	340.74	372.68	423.26	464.54	505.78	380.66	419.28	457.86
72	251.58	282.86	314.12	220.94	247.56	274.18	367.36	405.96	444.56	332.76	367.36	401.96	456.54	501.14	545.72	409.94	451.22	492.48
73	270.20	302.80	335.42	240.92	269.54	298.14	395.32	435.90	476.50	356.70	392.66	428.58	487.14	533.74	580.32	439.24	483.16	527.08
74	291.50	326.76	362.04	259.56	289.50	319.44	423.26	465.86	508.44	383.32	421.94	460.52	521.76	571.02	620.24	467.20	513.10	559.02
75	314.12	351.38	388.66	279.52	311.46	343.40	452.54	497.80	543.04	408.62	449.22	489.80	553.70	605.62	657.52	500.46	549.72	598.96
76	358.06	398.64	439.24	320.78	356.04	391.32	500.46	549.72	598.96	456.54	501.14	545.72	602.96	659.52	716.08	549.72	603.62	657.52
77	399.30	443.24	487.14	364.70	403.30	441.90	549.72	602.30	654.86	505.78	553.70	601.62	652.20	713.42	774.64	597.64	655.54	713.42
78	444.56	491.16	537.72	409.94	451.22	492.48	601.62	658.86	716.08	557.70	610.28	662.84	704.12	770.00	835.86	649.52	712.10	774.64
79	489.80	540.38	590.96	455.20	500.46	545.72	652.20	713.42	774.64	608.28	664.84	721.40	753.34	823.90	894.44	698.78	766.00	833.20
80				500.46	548.38					660.18	721.40					750.68	822.56	
81				544.40	595.62					713.42	778.64					799.94	876.48	
82				592.30	647.54					765.34	835.20					851.84	933.04	
83				640.22	699.44					817.24	891.78					903.76	989.60	
84				684.14	746.70					867.82	946.36					955.66	999.98	

EXHIBIT XIII

RiverSource Life Insurance Company  
Annual Premiums with 10% Rate Increase

Comprehensive Reimbursement Policy  
FORM: 30160A-VA, with Endorsement Form 32100

Annual Premiums Per \$10 Daily Benefit

2 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Increase Option						Compound Benefit Increase Option					
	Deductible			Deductible			Deductible			Deductible			Deductible			Deductible		
	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days	20 days		90 days
	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage	Home Care Percentage
40	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
41	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
42	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
43	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
44	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
45	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
46	35.94	41.94	47.92	27.96	32.62	37.26	57.24	65.90	74.54	45.26	51.92	58.56	81.20	91.20	101.16	65.24	73.88	82.52
47	35.94	41.94	47.92	27.96	32.62	37.26	59.90	68.56	77.20	47.92	54.58	61.22	85.18	95.84	106.48	70.56	79.20	87.84
48	37.26	43.94	50.58	29.28	34.60	39.94	61.22	70.56	79.86	50.58	58.56	66.56	85.18	95.84	106.48	74.54	83.86	93.18
49	37.26	43.94	50.58	29.28	34.60	39.94	63.88	73.22	82.52	53.24	61.22	69.22	89.18	100.50	111.80	74.54	83.86	93.18
50	42.60	50.58	58.56	33.28	39.28	45.26	67.90	77.88	87.84	57.24	65.90	74.54	89.18	100.50	111.80	78.54	88.52	98.50
51	42.60	50.58	58.56	33.28	39.28	45.26	67.90	77.88	87.84	57.24	65.90	74.54	93.18	105.16	117.12	81.20	91.20	101.16
52	42.60	50.58	58.56	33.28	39.28	45.26	73.22	83.20	93.18	59.90	68.56	77.20	93.18	105.16	117.12	81.20	91.20	101.16
53	43.94	52.58	61.22	34.60	41.28	47.92	74.54	85.18	95.84	61.22	70.56	79.86	101.16	114.46	127.78	85.18	95.84	106.48
54	43.94	52.58	61.22	34.60	41.28	47.92	77.20	87.84	98.50	63.88	73.22	82.52	101.16	114.46	127.78	87.84	98.50	109.14
55	50.58	59.90	69.22	39.94	47.92	55.90	81.20	92.52	103.82	67.90	77.88	87.84	105.16	119.14	133.10	91.86	103.16	114.46
56	53.24	62.56	71.88	39.94	47.92	55.90	83.86	95.18	106.48	73.22	83.20	93.18	109.14	123.80	138.42	98.50	110.48	122.46
57	57.24	67.24	77.20	43.94	52.58	61.22	90.50	102.50	114.46	79.86	90.50	101.16	115.80	131.12	146.42	103.82	117.12	130.44
58	61.22	71.88	82.52	50.58	59.90	69.22	95.84	109.14	122.46	83.86	95.18	106.48	125.12	141.08	157.06	110.48	124.46	138.42
59	65.24	76.54	87.84	53.24	62.56	71.88	105.16	119.14	133.10	90.50	102.50	114.46	131.78	148.42	165.04	114.46	129.12	143.74
60	71.88	83.86	95.84	57.24	67.24	77.20	109.14	123.80	138.42	95.84	109.14	122.46	138.42	155.74	173.04	123.80	139.10	154.40
61	77.20	89.18	101.16	61.22	71.88	82.52	115.80	131.12	146.42	105.16	119.14	133.10	146.42	165.04	183.68	127.78	143.74	159.72
62	82.52	95.84	109.14	63.88	74.54	85.18	119.80	135.76	151.74	109.14	123.80	138.42	155.74	175.04	194.32	131.78	148.42	165.04
63	86.52	100.50	114.46	67.90	79.20	90.50	129.12	145.76	162.38	115.80	131.12	146.42	162.38	182.36	202.32	138.42	155.74	173.04
64	90.50	105.16	119.80	71.88	83.86	95.84	133.10	150.42	167.70	119.80	135.76	151.74	169.04	189.68	210.30	143.74	162.38	181.02
65	97.18	112.48	127.78	79.86	93.18	106.48	141.08	159.72	178.36	129.12	145.76	162.38	178.36	199.66	220.94	153.08	172.38	191.66
66	110.48	127.12	143.74	90.50	105.16	119.80	157.06	177.04	196.98	141.08	159.72	178.36	201.00	224.30	247.56	166.38	187.02	207.64
67	122.46	141.08	159.72	101.16	117.12	133.10	170.36	191.66	212.96	154.40	174.38	194.32	219.62	244.24	268.86	182.36	204.32	226.28
68	138.42	158.40	178.36	114.46	131.78	149.08	189.00	212.96	236.92	165.04	186.34	207.64	242.24	268.86	295.48	198.34	222.94	247.56
69	149.08	170.36	191.66	126.46	145.76	165.04	204.98	230.28	255.56	177.04	200.34	223.60	264.88	293.50	322.10	214.30	240.26	266.20
70	167.70	191.66	215.62	139.76	160.40	181.02	222.28	249.56	276.84	190.34	214.96	239.58	287.50	318.12	348.72	232.94	261.56	290.16
71	178.36	203.66	228.94	150.42	172.38	194.32	239.58	268.86	298.14	201.00	226.96	252.90	308.80	340.74	372.68	246.24	276.18	306.14
72	191.66	218.28	244.90	165.04	189.00	212.96	252.90	283.52	314.12	214.30	241.58	268.86	331.44	365.38	399.30	262.22	293.50	324.76
73	206.32	234.94	263.54	175.70	201.00	226.28	270.20	302.80	335.42	226.28	255.56	284.84	354.04	390.00	425.92	278.20	312.14	346.06
74	219.62	249.56	279.52	189.00	215.62	242.24	287.50	322.10	356.70	239.58	270.20	300.80	375.34	412.62	449.88	294.16	329.42	364.70
75	234.26	266.20	298.14	203.66	232.28	260.88	304.82	341.42	378.00	250.22	282.18	314.12	399.30	439.24	479.16	314.12	351.38	388.66
76	267.54	302.80	338.08	232.94	264.22	295.48	332.76	372.68	412.62	278.20	313.46	348.72	431.24	473.84	516.42	347.40	388.00	428.58
77	300.80	339.42	378.00	268.86	303.46	338.08	364.70	407.28	449.88	308.80	347.40	386.00	464.54	510.44	556.36	380.66	424.60	468.52
78	334.10	376.02	417.94	303.46	342.08	380.66	392.66	438.58	484.48	335.42	376.68	417.94	500.46	549.72	598.96	415.28	461.86	508.44
79	367.36	412.62	457.86	332.76	374.02	415.28	424.60	474.52	524.42	370.02	415.28	460.52	532.40	584.32	636.22	448.56	498.48	548.38
80				370.02	415.28					396.64	444.56					480.50	533.08	
81				401.96	449.88					427.26	478.50					516.42	572.34	
82				436.56	488.48					459.20	514.44					549.72	608.94	
83				473.84	529.74					491.16	550.38					584.32	646.20	
84				508.44	568.34					524.42	586.98					617.58	682.82	