Filing at a Glance

Company:	RiverSource Life Insurance Company
Product Name:	Long Term Care
State:	Virginia
TOI:	LTC04I Individual Long Term Care - Nursing Home
Sub-TOI:	LTC04I.001 Qualified
Filing Type:	Rate
Date Submitted:	08/01/2013
SERFF Tr Num:	AERS-129009929
SERFF Status:	Closed-Approved
State Tr Num:	AERS-129009929
State Status:	Approved
Co Tr Num:	30240 2013
Implementation Date Requested:	On Approval
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: *LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*
Product Name: *Long Term Care*
Project Name/Number: *30240 2013/30240 2013*

General Information

Project Name: 30240 2013
Project Number: 30240 2013
Requested Filing Mode: Review & Approval
Explanation for Combination/Other:
Submission Type: New Submission
Overall Rate Impact: 20%

Deemer Date:
Submitted By: Cheryl Meyer

Status of Filing in Domicile: Not Filed
Date Approved in Domicile:
Domicile Status Comments:
Market Type: Individual
Individual Market Type:
Filing Status Changed: 12/03/2014
State Status Changed: 12/03/2014
Created By: Cheryl Meyer
Corresponding Filing Tracking Number:
State TOI: LTC04I Individual Long Term Care - Nursing Home

Filing Description:
Please see attached cover letter.

Company and Contact

Filing Contact Information

Cheryl Meyer, Sr. Contract Analyst
9550 Ameriprise Financial Center
H25/9550
Minneapolis, MN 55474

Cheryl.D.Meyer@ampf.com
612-671-5583 [Phone]
612-678-0034 [FAX]

Filing Company Information

RiverSource Life Insurance Company
9550 Ameriprise Financial Center, H22/9550
Minneapolis, MN 55474
(612) 671-2465 ext. [Phone]

CoCode: 65005
Group Code: 4
Group Name:
FEIN Number: 41-0823832

State of Domicile: Minnesota
Company Type: Life
State ID Number:

Filing Fees

Fee Required? No
Retaliatory? No
Fee Explanation:

State: *Virginia* **Filing Company:** *RiverSource Life Insurance Company*
TOI/Sub-TOI: *LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*
Product Name: *Long Term Care*
Project Name/Number: *30240 2013/30240 2013*

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
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	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
Response to Note to Filer 12/1/14	Note To Reviewer	Cheryl Meyer	12/02/2014	12/02/2014
Verification of Overall Percentage Indicated Rate Change	Note To Filer	Janet Houser	12/01/2014	12/01/2014
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
RRS	Reviewer Note	Janet Houser	12/03/2014	
policyholder letters	Reviewer Note	Janet Houser	06/30/2014	
Rate Summary Part II	Reviewer Note	Janet Houser	03/05/2014	
Act Review	Reviewer Note	Janet Houser	01/07/2014	

State: *Virginia* **Filing Company:** *RiverSource Life Insurance Company*
TOI/Sub-TOI: *LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*
Product Name: *Long Term Care*
Project Name/Number: *30240 2013/30240 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	1,144.100%	20.000%	$108,043	439	$540,213	20.000%	20.000%

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 Letter	Received & Acknowledged	Yes
Supporting Document	Rate Revision Checklist	Received & Acknowledged	Yes
Supporting Document	Response 12-3-13	Received & Acknowledged	Yes
Supporting Document	Response 2-19-14	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 ExhibitXIV Premiums 30240	Approved	Yes
Rate	VA ExhibitXIV Premiums 30240	Approved	Yes
Rate	VA ExhibitXIV Premiums 30240		Yes

State:	*Virginia*	**Filing Company:**	*RiverSource Life Insurance Company*
TOI/Sub-TOI:	*LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*		
Product Name:	*Long Term Care*		
Project Name/Number:	*30240 2013/30240 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 bother 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

State:	*Virginia*	**Filing Company:**	*RiverSource Life Insurance Company*
TOI/Sub-TOI:	*LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*		
Product Name:	*Long Term Care*		
Project Name/Number:	*30240 2013/30240 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, this new information presents the following concerns and /or questions:

Objection 1

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 2

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 3

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 4

Comments: Since the Company is relying on the nationwide experience to support the need for the rate increase, the earned premiums in all exhibits containing nationwide projections need to be restated to the premiums which would have been collected had all policies been issued in Virginia. This calculation does not have to be done on a seriatim basis, but can be estimated based on the ratio of the weighted average rate increase percentage approved and implemented across all states vs. the increases implemented in Virginia. Adjustments should be made for each year since the first rate increases were implemented in 2005 and also apply to projected future premiums.

Objection 5

- VA ExhibitXIV Premiums 30240, [30240-VA1] (Rate)

- VA ExhibitXIV Premiums 30240, [30240-VA] (Rate)

Comments: Please confirm the Overall Percentage Indicated Change under the Company Rate Information on the Rate/Rule Schedule of 1144.10% is correct.

State:	Virginia	**Filing Company:**	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30240 2013/30240 2013		

Objection 6

- 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 revised forms to address 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

Reset Form

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

Company Name and NAIC Number:

SERFF Tracking Number:

Effective Date:

(Projected) Number of Insureds Affected:

New Rates

Average Annual Premium Per Member:

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:

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

Form#	**"Product Name"(if applicable)**

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.

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

COMMONWEALTH OF VIRGINIA

P.O. BOX 1157
RICHMOND, VIRGINIA 23218
TELEPHONE: (804) 371-9741
TDD/VOICE: (804) 371-9206
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/

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

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

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

Sincerely,

Jacqueline K. Cunningham
Commissioner of Insurance

jkc/tt

State:	*Virginia*	**Filing Company:**	*RiverSource Life Insurance Company*
TOI/Sub-TOI:	*LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*		
Product Name:	*Long Term Care*		
Project Name/Number:	*30240 2013/30240 2013*		

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.

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.

Please provide 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

State: *Virginia* **Filing Company:** *RiverSource Life Insurance Company*
TOI/Sub-TOI: *LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*
Product Name: *Long Term Care*
Project Name/Number: *30240 2013/30240 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	
Satisfied - Item:	L&H Actuarial Memorandum
Comments:	
Attachment(s):	VA Revised_ActMem_30240_20140530.pdf
Previous Version	
Satisfied - Item:	*L&H Actuarial Memorandum*
Comments:	
Attachment(s):	*VA Revised_ActMem_30240_20140219.pdf*
Previous Version	
Satisfied - Item:	*L&H Actuarial Memorandum*
Comments:	
Attachment(s):	*VA ActMem_30240_20130801.pdf*

State: *Virginia* **Filing Company:** *RiverSource Life Insurance Company*
TOI/Sub-TOI: *LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*
Product Name: *Long Term Care*
Project Name/Number: *30240 2013/30240 2013*

Supporting Document Schedule Item Changes	
Satisfied - Item:	L&H Actuarial Memorandum
Comments:	
Attachment(s):	VA Revised_ActMem_30240_20140530.pdf
Previous Version	
Satisfied - Item:	*L&H Actuarial Memorandum*
Comments:	
Attachment(s):	*VA Revised_ActMem_30240_20140219.pdf*
Previous Version	
Satisfied - Item:	*L&H Actuarial Memorandum*
Comments:	
Attachment(s):	*VA ActMem_30240_20130801.pdf*

Satisfied - Item:	Response 5-30-14
Comments:	
Attachment(s):	VA Response_30240_20140530.pdf VA Rate Request Summary_30240_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.

State: *Virginia* **Filing Company:** *RiverSource Life Insurance Company*
TOI/Sub-TOI: *LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*
Product Name: *Long Term Care*
Project Name/Number: *30240 2013/30240 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 ExhibitXIV Premiums 30240	30240-VA	Revised	Previous State Filing Number: AERS-126909922 Percent Rate Change Request: 20	VA ExhXV_Premiums_30240_20140530.pdf,	05/30/2014 By: Cheryl Meyer
Previous Version						
1	*VA ExhibitXIV Premiums 30240*	*30240-VA*	*Revised*	*Previous State Filing Number: AERS-126909922 Percent Rate Change Request: 20*	*VA ExhXIV_Premiums_30240_20130801.pdf,*	*08/01/2013 By: Cheryl Meyer*

Conclusion:

Thank you.

Sincerely,

Cheryl Meyer

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30240 2013/30240 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: 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:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Response 2-19-14
Comments:	
Attachment(s):	VA Response_30240_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_30240_20140219.pdf

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30240 2013/30240 2013

Supporting Document Schedule Item Changes	
Satisfied - Item:	Response 2-19-14
Comments:	
Attachment(s):	VA Response_30240_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_30240_20140219.pdf

Satisfied - Item:	L&H Actuarial Memorandum
Comments:	
Attachment(s):	VA Revised_ActMem_30240_20140219.pdf
Previous Version	
Satisfied - Item:	*L&H Actuarial Memorandum*
Comments:	
Attachment(s):	*VA ActMem_30240_20130801.pdf*

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 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.

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30240 2013/30240 2013

Response 3

Comments:

Please see the response attached in objection 1.

Related Objection 3

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:

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

Comments: Since the Company is relying on the nationwide experience to support the need for the rate increase, the earned premiums in all exhibits containing nationwide projections need to be restated to the premiums which would have been collected had all policies been issued in Virginia. This calculation does not have to be done on a seriatim basis, but can be estimated based on the ratio of the weighted average rate increase percentage approved and implemented across all states vs. the increases implemented in Virginia. Adjustments should be made for each year since the first rate increases were implemented in 2005 and also apply to projected future premiums.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Response 5

Comments:

Please see the response attached in objection 1.

Related Objection 5

Applies To:

- VA ExhibitXIV Premiums 30240, [30240-VA] (Rate)
- VA ExhibitXIV Premiums 30240, [30240-VA1] (Rate)

Comments: Please confirm the Overall Percentage Indicated Change under the Company Rate Information on the Rate/Rule Schedule of 1144.10% is correct.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Response 6

Comments:

Please see the response attached in objection 1.

Related Objection 6

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:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30240 2013/30240 2013

Thank you.
Sincerely,
Cheryl Meyer

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30240 2013/30240 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 the attached response.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Response 12-3-13
Comments:	
Attachment(s):	VA Response_30240_20131203.pdf VA Response_Attachments_30240_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:	*LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*		
Product Name:	*Long Term Care*		
Project Name/Number:	*30240 2013/30240 2013*		

Note To Reviewer

Created By:

Cheryl Meyer on 12/02/2014 10:33 AM

Last Edited By:

Cheryl Meyer

Submitted On:

12/02/2014 10:51 AM

Subject:

Response to Note to Filer 12/1/14

Comments:

Thank you for the note to filer on 12/1/14. The response to item 5 in the response letter on February 19, 2014 letter had a typo in it. The correct overall percentage rate change is 1144.1%. Thank you for clarifying this item.

Best Regards,
Cheryl Meyer

State:	*Virginia*	**Filing Company:**	*RiverSource Life Insurance Company*
TOI/Sub-TOI:	*LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*		
Product Name:	*Long Term Care*		
Project Name/Number:	*30240 2013/30240 2013*		

Note To Filer

Created By:

Janet Houser on 12/01/2014 10:05 AM

Last Edited By:

Janet Houser

Submitted On:

12/01/2014 10:06 AM

Subject:

Verification of Overall Percentage Indicated Rate Change

Comments:

Under the Rate/Rule Schedule, the overall percentage rate change is 1144.1%. When verifying this data in its February 19, 2014 response, item 5, the company stated 1114.1% is correct. This may be a typographical error or the Rate/Rule Schedule should be corrected. If the Rate/Rule Schedule is incorrect, please do a post submission update. Thanks!

State:	*Virginia*	**Filing Company:**	*RiverSource Life Insurance Company*
TOI/Sub-TOI:	*LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*		
Product Name:	*Long Term Care*		
Project Name/Number:	*30240 2013/30240 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:	*LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*		
Product Name:	*Long Term Care*		
Project Name/Number:	*30240 2013/30240 2013*		

Note To Filer

Created By:

Janet Houser on 07/10/2014 07:53 AM

Last Edited By:

Janet Houser

Submitted On:

07/10/2014 07:53 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:	*LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*		
Product Name:	*Long Term Care*		
Project Name/Number:	*30240 2013/30240 2013*		

Note To Reviewer

Created By:

Cheryl Meyer on 07/09/2014 11:57 AM

Last Edited By:

Cheryl Meyer

Submitted On:

07/09/2014 11:57 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:	*LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*		
Product Name:	*Long Term Care*		
Project Name/Number:	*30240 2013/30240 2013*		

Reviewer Note

Created By:

Janet Houser on 12/03/2014 12:30 PM

Last Edited By:

Janet Houser

Submitted On:

12/03/2014 01:17 PM

Subject:

RRS

Comments:

Rate Summaries

Reset Form

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

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

SERFF Tracking Number: AERS-129009929

Effective Date: Upon approval

Revised Rates

Average Annual Premium Per Member: $1476

Average Requested Percentage Rate Change Per Member: 20%

Minimum Requested Percentage Rate Change Per Member: 20%

Maximum Requested Percentage Rate Change Per Member: 20%

Number of Policy Holders Affected : 439

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

Form#	"Product Name"(if applicable)
30240-VA 30240-VA1	

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-129009929

Disposition: approved

Approval Date: 12/3/2014

Revised Rates

Average Annual Premium Per Member: $1476

Average Requested Percentage Rate Change Per Member: 20%

Minimum Requested Percentage Rate Change Per Member: 20%

Maximum Requested Percentage Rate Change Per Member: 20%

Number of Policy Holders Affected: 439

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

The Company submitted a rate increase request of 20%. 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 439 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 assumptions and projections were reviewed and checked for reasonableness. The projected lifetime loss ratio is 91.9% and the anticipated future loss ratio taking into account the policy reserves is 62.9%. These ratios both exceed the required minimum, which is the greater of the original pricing loss ratio of 55% 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 20% 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 explain the decision made by the Bureau of Insurance and it is only a summary of the Bureau's review. 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:	*LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*		
Product Name:	*Long Term Care*		
Project Name/Number:	*30240 2013/30240 2013*		

Reviewer Note

Created By:

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

Last Edited By:

Janet Houser

Submitted On:

12/03/2014 01:17 PM

Subject:

policyholder letters

Comments:

6.30.14 - consumer services approves

State:	*Virginia*	**Filing Company:**	*RiverSource Life Insurance Company*
TOI/Sub-TOI:	*LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*		
Product Name:	*Long Term Care*		
Project Name/Number:	*30240 2013/30240 2013*		

Reviewer Note

Created By:

Janet Houser on 03/05/2014 02:51 PM

Last Edited By:

Janet Houser

Submitted On:

01/28/2015 06:18 AM

Subject:

Rate Summary Part II

Comments:

see attached

10.28.14 - revised rate 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-129009929**

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: $1,476

Average Requested Percentage Rate Change Per Member: 20%

Minimum Requested Percentage Rate Change Per Member: 20%

Maximum Requested Percentage Rate Change Per Member: 20%

+

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

The Company submitted a rate increase request of 20%. 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 439 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 assumptions and projections were reviewed and checked for reasonableness. 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-129009929**

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: $1,476

Average Requested Percentage Rate Change Per Member: 20%

Minimum Requested Percentage Rate Change Per Member: 20%

Maximum Requested Percentage Rate Change Per Member: 20%

+

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

The Company submitted a rate increase request of 20%. 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 439 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 assumptions and projections were reviewed and checked for reasonableness. The projected lifetime loss ratio is 91.9% and the anticipated future loss ratio taking into account the policy reserves is 62.9%. These ratios both exceed the required minimum, which is the greater of the original pricing loss ratio of 55% 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.

State:	*Virginia*	**Filing Company:**	*RiverSource Life Insurance Company*
TOI/Sub-TOI:	*LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*		
Product Name:	*Long Term Care*		
Project Name/Number:	*30240 2013/30240 2013*		

Reviewer Note

Created By:

Janet Houser on 01/07/2014 06:59 AM

Last Edited By:

Janet Houser

Submitted On:

12/03/2014 01:17 PM

Subject:

Act Review

Comments:

sent to ARC 12.27.13

1.6.14 - add'l info needed

2.19.14 - add'l info rec'd; sent to act 2.25.14; due date 3.11.14

2.26.14 - recommend approval

10.28.14 - revised recommendation with NAIC compliance

ACTUARIAL RESOURCES CORPORATION
CONSULTANTS • ACTUARIES
SHAWN D. PARKS, FSA, MAAA
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January 6, 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-129009929
Policy Form 30240-VA and 30240-VA1

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. This block of business is not available for new issues.

Recommendation

After review of the Company's submission, we recommend that the Virginia SCC Bureau of Insurance (the "Bureau") disapprove the proposed rates and ask the Company to respond to the following:

- Since the Company is relying on the nationwide experience to support the need for the rate increase, the earned premiums in all exhibits containing nationwide projections need to be restated to the premiums which would have been collected had all policies been issued in Virginia. This calculation does not have to be done on a seriatim basis, but can be estimated based on the ratio of the weighted average rate increase percentage approved and implemented across all states vs. the increases implemented in Virginia. Adjustments should be made for each year since the first rate increases were implemented in 2005 and also apply to projected future premiums.

Historical Background

The Company has submitted a 20% rate increase request based on its projection of future and lifetime loss ratios. The Company previously has raised rates by 29% in 2006, 15% in 2009, and by 20.3% in 2012. Implementation of the requested 20% increase would bring the cumulative rate increase percentage to 114.2%. The average cumulative nationwide rate increase as of 12/3/2013 is 98%.

Analysis

The form was issued in Virginia from 8/1989 through 5/1993 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.

Loss Ratios

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. Because the Virginia-only business is not credible on its own, the Company has used the nationwide experience under this form as the basis for its request. However, it does not appear that the Company has accounted for the difference in Virginia premiums vs. the nationwide average. Since Virginia has approved the maximum rate increases requested, this will make an impact on the projections, so we have asked the Company to resubmit all nationwide projections with the adjusted premiums. We have reviewed and performed calculation checks on the exhibits provided by the Company and not found any other issues with the exhibits.

While subject to change based on the adjustment of premiums discussed above, we present a summary of all applicable projected loss ratios:

A. Reported Lifetime LR based on original pricing	55.0%
B. Lifetime LR in the previous rate increase filing with current rates	90.8%
C. Lifetime LR currently projected w/o rate increase	92.8%
D. Lifetime LR currently projected w/ 20% rate increase	91.9%
E. Lifetime LR with requested premiums applicable from inception	47.3%
F. Lifetime LR with current premiums applicable from inception	56.7%
G. Anticipated Future LR w/ Active Life Reserves	62.9%

A comparison of C (92.8%) to B (90.8%) above shows that the expected lifetime loss ratio has worsened since the last rate increase. However, the requested 20% rate increase only reduces the expected loss ratio to 91.9% (D). This relative insensitivity of the lifetime loss ratio is due to the fact that approximately 95% of the total present value of premiums has already been collected, so the lifetime loss ratio is heavily weighted toward what has happened in the past and affected only slightly by future premium changes.

Because of this insensitivity, it is important to look at additional measures to determine whether the request is reasonable. One of these measures that the Bureau has traditionally used for this purpose is the lifetime loss ratio assuming the requested premiums were charged from inception which results in a 47.3% loss ratio (E). Note that this measure using the current premiums (F) is 56.7% which implies that no increase would be allowable. However, based on the information in the following paragraph, we would not recommend that the Bureau restrict the rate increase based on this measure.

In the Company's 12/3/2013 letter, they have provided another measure that attempts to prove that they are not recouping past losses – the lifetime loss ratio using the historical

experience combined with projections based on original pricing assumptions of 84.5%. The assertion is that as long as the projected lifetime loss ratio is higher than 84.5% that the Company is not recouping any past losses.

The anticipated future loss ratio considering the active life reserves (G) is also above the 60% minimum loss ratio.

Assumptions

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 slightly 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 both increased and decreased slightly since the 2011 assumptions depending on age with an overall slight increase producing slightly higher loss ratio projections.

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 90.8% to 92.8%.

Other

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 morbidity assumptions followed by the change in lapse assumptions.

The Company has indicated in their December 3, 2013 letter that "while the company currently has no formal plan to seek additional increases on this policy form, we believe that two (or possibly more) additional 15% rate increases would likely be requested if experience emerges with our current best estimate assumptions." This issue of whether additional disclosures are required 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

cc: John A. MacBain

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

February 26, 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-129009929
Policy Form 30240-VA and 30240-VA1

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. 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 20% rate increase request based on its projection of future and lifetime loss ratios. The Company previously has raised rates by 29% in 2006, 15% in 2009, and by 20.3% in 2012. Implementation of the requested 20% increase would bring the cumulative rate increase percentage to 114.2%. The average cumulative nationwide rate increase as of 12/3/2013 is 98%.

Analysis

The form was issued in Virginia from 8/1989 through 5/1993 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.

<u>Loss Ratios</u>
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. Because the Virginia-only business is not credible on its own, the Company has used the nationwide

experience under this form as the basis for its request. The Company has clarified in its February 19, 2014 response letter that it has accounted for the difference in Virginia premiums vs. the nationwide average in the projections of Exhibit XI and Exhibit X. We have reviewed and performed calculation checks on the exhibits provided by the Company and not found any issues with the exhibits.

While subject to change based on the adjustment of premiums discussed above, we present a summary of all applicable projected loss ratios:

A. Reported Lifetime LR based on original pricing	55.0%
B. Lifetime LR in the previous rate increase filing with current rates	90.8%
C. Lifetime LR currently projected w/o rate increase	92.8%
D. Lifetime LR currently projected w/ 20% rate increase	91.9%
E. Lifetime LR with requested premiums applicable from inception	47.3%
F. Lifetime LR with current premiums applicable from inception	56.7%
G. Anticipated Future LR w/ Active Life Reserves	62.9%

A comparison of C (92.8%) to B (90.8%) above shows that the expected lifetime loss ratio has worsened since the last rate increase. However, the requested 20% rate increase only reduces the expected loss ratio to 91.9% (D). This relative insensitivity of the lifetime loss ratio is due to the fact that approximately 95% of the total present value of premiums has already been collected, so the lifetime loss ratio is heavily weighted toward what has happened in the past and affected only slightly by future premium changes.

Because of this insensitivity, it is important to look at additional measures to determine whether the request is reasonable. One of these measures that the Bureau has traditionally used for this purpose is the lifetime loss ratio assuming the requested premiums were charged from inception which results in a 47.3% loss ratio (E). Note that this measure using the current premiums (F) is 56.7% which implies that no increase would be allowable. However, based on the information in the following paragraph, we would not recommend that the Bureau restrict the rate increase based on this measure.

In the Company's 12/3/2013 letter, they have provided another measure that attempts to prove that they are not recouping past losses – the lifetime loss ratio using the historical experience combined with projections based on original pricing assumptions of 84.5%. The assertion is that as long as the projected lifetime loss ratio is higher than 84.5% that the Company is not recouping any past losses.

The anticipated future loss ratio considering the active life reserves (G) is also above the 60% minimum loss ratio.

<u>Assumptions</u>

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 slightly 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 both increased and decreased slightly since the 2011 assumptions depending on age with an overall slight increase producing slightly higher loss ratio projections.

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 90.8% to 92.8%.

Other

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 morbidity assumptions followed by the change in lapse assumptions.

The Company has indicated in their December 3, 2013 letter that "while the company currently has no formal plan to seek additional increases on this policy form, we believe that two (or possibly more) additional 15% rate increases would likely be requested if experience emerges with our current best estimate assumptions." This issue of whether additional disclosures are required 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

cc: John A. MacBain

ACTUARIAL RESOURCES CORPORATION
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SHAWN D. PARKS, FSA, MAAA
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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-129009929
Policy Form 30240-VA and 30240-VA1

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. 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 20% rate increase request based on its projection of future and lifetime loss ratios. The Company previously has raised rates by 29% in 2006, 15% in 2009, and by 20.3% in 2012. Implementation of the requested 20% increase would bring the cumulative rate increase percentage to 114.2%. The average cumulative nationwide rate increase as of 12/3/2013 is 98%.

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 20% 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 XIII, 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,

Shawn D. Parks, FSA, MAAA

State: *Virginia* **Filing Company:** *RiverSource Life Insurance Company*
TOI/Sub-TOI: *LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*
Product Name: *Long Term Care*
Project Name/Number: *30240 2013/30240 2013*

Rate Information

Rate data applies to filing.

Filing Method: Review and Approve
Rate Change Type: Increase
Overall Percentage of Last Rate Revision: 20.300%
Effective Date of Last Rate Revision: 11/01/2011
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	1,144.100%	20.000%	$108,043	439	$540,213	20.000%	20.000%

State: *Virginia* **Filing Company:** *RiverSource Life Insurance Company*
TOI/Sub-TOI: *LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*
Product Name: *Long Term Care*
Project Name/Number: *30240 2013/30240 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 ExhibitXIV Premiums 30240	30240-VA	Revised	Previous State Filing Number: AERS-126909922 Percent Rate Change Request: 20	VA ExhXV_Premiums_30240_20140530.pdf,
2		VA ExhibitXIV Premiums 30240	30240-VA1	Revised	Previous State Filing Number: AERS-126909922 Percent Rate Change Request: 20	VA ExhXIV_Premiums_30240_20130801.pdf,

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

LIFETIME BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	86.54	65.36	181.68	137.32	277.04	209.54
51	86.54	65.36	181.68	137.32	277.04	209.54
52	86.54	65.36	181.68	137.32	277.04	209.54
53	86.54	65.36	181.68	137.32	277.04	209.54
54	86.54	65.36	181.68	137.32	277.04	209.54
55	86.54	65.36	181.68	137.32	277.04	209.54
56	94.28	73.06	197.76	153.40	299.52	232.46
57	101.76	78.86	213.82	165.62	326.74	253.04
58	113.36	86.54	238.04	181.68	352.66	269.12
59	124.92	94.28	257.08	193.90	378.14	285.16
60	136.48	107.78	275.08	217.06	406.22	320.52
61	151.92	122.98	290.08	235.22	427.20	335.74
62	165.20	130.68	303.60	240.40	437.30	350.50
63	188.36	151.92	330.14	266.30	462.76	373.20
64	209.54	165.40	354.16	279.60	499.42	394.20
65	230.52	188.54	373.00	304.66	530.68	433.44
66	251.74	201.82	393.76	316.04	545.68	437.92
67	280.66	223.04	427.20	339.60	592.18	470.72
68	309.36	251.96	464.48	378.36	650.24	529.60
69	346.04	275.08	505.00	401.28	704.66	560.04
70	382.42	303.80	542.04	430.64	789.28	627.10
71	418.84	332.72	580.58	461.06	803.64	638.04
72	461.28	367.22	619.82	493.64	838.78	668.00
73	511.18	411.58	671.02	540.14	888.24	715.16
74	563.04	453.76	721.40	581.44	946.96	763.36
75	626.48	498.12	782.86	622.40	999.98	821.20
76	691.80	548.02	842.64	667.58	999.98	863.40
77	757.16	605.68	914.40	731.42	999.98	947.62
78	822.50	655.80	967.32	771.28	999.98	999.98
79	885.92	713.42	999.98	824.00	999.98	999.98

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

4 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	66.62	48.00	139.68	100.90	193.68	139.90
51	66.62	48.00	139.68	100.90	193.68	139.90
52	66.62	48.00	139.68	100.90	193.68	139.90
53	66.62	48.00	139.68	100.90	193.68	139.90
54	66.62	48.00	139.68	100.90	193.68	139.90
55	66.62	48.00	139.68	100.90	193.68	139.90
56	72.44	53.78	152.12	112.92	209.54	155.54
57	78.40	58.08	164.54	121.68	228.60	169.06
58	87.22	63.64	183.20	133.70	246.60	179.98
59	96.22	69.22	197.76	142.70	264.38	190.68
60	105.00	79.28	211.66	159.60	284.30	214.24
61	116.78	90.40	223.24	172.92	298.88	225.20
62	127.04	96.22	233.52	176.76	305.96	238.04
63	144.82	111.64	254.08	195.82	323.72	249.62
64	161.12	121.68	272.30	205.68	349.00	263.74
65	177.38	138.62	286.88	224.12	366.76	281.30
66	193.68	148.48	302.92	232.24	383.92	296.96
67	215.76	164.12	328.66	249.82	414.14	314.96
68	238.04	185.32	357.36	278.08	454.84	353.96
69	266.08	202.24	388.44	295.00	492.76	374.28
70	294.16	223.48	416.92	316.66	551.88	419.30
71	322.22	244.68	446.72	339.14	562.18	426.76
72	354.80	270.16	476.90	362.96	586.82	446.50
73	393.14	302.52	516.12	397.22	621.12	477.98
74	433.20	333.80	554.90	427.42	662.24	510.12
75	481.84	366.14	602.26	457.64	722.42	548.90
76	532.18	403.00	648.28	490.84	762.28	576.98
77	582.56	445.44	703.40	537.76	828.50	633.32
78	632.66	482.28	744.08	567.12	886.34	675.50
79	681.52	524.72	787.12	605.88	958.10	737.44

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

3 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	59.78	45.22	125.54	94.92	173.96	131.54
51	59.78	45.22	125.54	94.92	173.96	131.54
52	59.78	45.22	125.54	94.92	173.96	131.54
53	59.78	45.22	125.54	94.92	173.96	131.54
54	59.78	45.22	125.54	94.92	173.96	131.54
55	59.78	45.22	125.54	94.92	173.96	131.54
56	64.52	49.92	135.40	104.76	186.38	144.20
57	70.70	54.64	148.48	114.84	206.12	159.38
58	79.08	60.40	166.04	126.82	223.68	170.76
59	86.54	65.14	178.06	134.12	238.04	179.36
60	94.28	74.14	190.06	149.54	255.16	200.76
61	104.14	84.40	199.06	161.32	266.54	215.98
62	114.40	90.64	210.16	166.48	275.30	222.38
63	131.14	105.84	229.88	185.52	292.90	236.30
64	144.82	114.22	244.90	193.04	313.88	247.46
65	159.20	130.06	257.30	210.38	326.30	261.38
66	172.70	138.40	270.16	216.60	340.44	272.92
67	194.52	154.48	296.08	235.22	373.20	296.50
68	215.52	175.48	323.72	263.52	412.00	335.30
69	239.32	190.24	349.22	277.66	443.06	352.22
70	263.92	209.54	374.06	296.96	495.34	393.14
71	287.08	227.96	397.84	316.04	500.68	397.64
72	319.90	254.52	430.00	342.16	528.98	421.00
73	356.52	286.66	467.90	376.22	563.04	452.68
74	389.72	313.66	499.20	401.72	595.82	479.48
75	432.36	343.66	540.14	429.34	647.88	515.04
76	474.34	375.58	577.82	457.42	679.36	537.76
77	525.12	419.72	634.18	506.72	746.86	596.68
78	572.90	456.56	673.80	536.90	802.56	639.52
79	612.96	493.18	707.86	569.68	861.48	693.28

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

2 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	50.36	37.70	105.62	79.28	146.56	109.90
51	50.36	37.70	105.62	79.28	146.56	109.90
52	50.36	37.70	105.62	79.28	146.56	109.90
53	50.36	37.70	105.62	79.28	146.56	109.90
54	50.36	37.70	105.62	79.28	146.56	109.90
55	50.36	37.70	105.62	79.28	146.56	109.90
56	56.14	40.48	118.06	85.06	162.62	117.20
57	60.64	45.84	127.28	96.40	176.76	133.92
58	66.62	51.22	139.68	107.78	188.08	145.06
59	72.44	55.28	149.12	114.00	199.46	152.32
60	82.68	60.86	166.90	122.54	219.82	164.54
61	88.70	66.22	169.46	126.40	226.90	169.24
62	100.48	75.62	184.68	138.84	241.90	177.60
63	110.98	80.98	194.32	142.06	247.66	181.06
64	127.04	91.68	214.90	155.12	275.52	198.84
65	139.06	101.36	224.74	163.70	290.74	211.66
66	155.32	112.06	242.74	175.28	305.74	220.88
67	171.40	121.48	261.16	184.90	329.06	233.12
68	189.20	136.28	284.08	204.60	361.44	260.32
69	205.48	147.20	299.96	214.68	380.50	272.30
70	221.74	161.96	314.30	229.66	416.06	304.00
71	244.04	176.76	338.06	245.08	425.48	308.52
72	266.08	193.04	357.58	259.46	439.88	319.22
73	288.36	212.52	378.36	278.96	455.28	335.74
74	316.46	232.90	405.36	298.22	483.76	355.88
75	348.80	253.68	436.00	317.08	522.98	380.30
76	382.88	278.08	466.42	338.74	548.28	398.30
77	415.44	303.80	501.56	366.76	590.68	431.90
78	449.50	329.30	528.56	387.36	629.44	461.48
79	487.84	355.00	563.44	410.06	685.80	499.20
80		384.76				
81		415.64				
82		450.76				
83		485.90				
84		531.76				

EXHIBIT XIV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

LIFETIME BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	86.54	65.36	181.68	137.32	277.04	209.54
51	86.54	65.36	181.68	137.32	277.04	209.54
52	86.54	65.36	181.68	137.32	277.04	209.54
53	86.54	65.36	181.68	137.32	277.04	209.54
54	86.54	65.36	181.68	137.32	277.04	209.54
55	86.54	65.36	181.68	137.32	277.04	209.54
56	94.28	73.06	197.76	153.40	299.52	232.46
57	101.76	78.86	213.82	165.62	326.74	253.04
58	113.36	86.54	238.04	181.68	352.66	269.12
59	124.92	94.28	257.08	193.90	378.14	285.16
60	136.48	107.78	275.08	217.06	406.22	320.52
61	151.92	122.98	290.08	235.22	427.20	335.74
62	165.20	130.68	303.60	240.40	437.30	350.50
63	188.36	151.92	330.14	266.30	462.76	373.20
64	209.54	165.40	354.16	279.60	499.42	394.20
65	230.52	188.54	373.00	304.66	530.68	433.44
66	251.74	201.82	393.76	316.04	545.68	437.92
67	280.66	223.04	427.20	339.60	592.18	470.72
68	309.36	251.96	464.48	378.36	650.24	529.60
69	346.04	275.08	505.00	401.28	704.66	560.04
70	382.42	303.80	542.04	430.64	789.28	627.10
71	418.84	332.72	580.58	461.06	803.64	638.04
72	461.28	367.22	619.82	493.64	838.78	668.00
73	511.18	411.58	671.02	540.14	888.24	715.16
74	563.04	453.76	721.40	581.44	946.96	763.36
75	626.48	498.12	782.86	622.40	999.98	821.20
76	691.80	548.02	842.64	667.58	999.98	863.40
77	757.16	605.68	914.40	731.42	999.98	947.62
78	822.50	655.80	967.32	771.28	999.98	999.98
79	885.92	713.42	999.98	824.00	999.98	999.98

EXHIBIT XIV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

4 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	66.62	48.00	139.68	100.90	193.68	139.90
51	66.62	48.00	139.68	100.90	193.68	139.90
52	66.62	48.00	139.68	100.90	193.68	139.90
53	66.62	48.00	139.68	100.90	193.68	139.90
54	66.62	48.00	139.68	100.90	193.68	139.90
55	66.62	48.00	139.68	100.90	193.68	139.90
56	72.44	53.78	152.12	112.92	209.54	155.54
57	78.40	58.08	164.54	121.68	228.60	169.06
58	87.22	63.64	183.20	133.70	246.60	179.98
59	96.22	69.22	197.76	142.70	264.38	190.68
60	105.00	79.28	211.66	159.60	284.30	214.24
61	116.78	90.40	223.24	172.92	298.88	225.20
62	127.04	96.22	233.52	176.76	305.96	238.04
63	144.82	111.64	254.08	195.82	323.72	249.62
64	161.12	121.68	272.30	205.68	349.00	263.74
65	177.38	138.62	286.88	224.12	366.76	281.30
66	193.68	148.48	302.92	232.24	383.92	296.96
67	215.76	164.12	328.66	249.82	414.14	314.96
68	238.04	185.32	357.36	278.08	454.84	353.96
69	266.08	202.24	388.44	295.00	492.76	374.28
70	294.16	223.48	416.92	316.66	551.88	419.30
71	322.22	244.68	446.72	339.14	562.18	426.76
72	354.80	270.16	476.90	362.96	586.82	446.50
73	393.14	302.52	516.12	397.22	621.12	477.98
74	433.20	333.80	554.90	427.42	662.24	510.12
75	481.84	366.14	602.26	457.64	722.42	548.90
76	532.18	403.00	648.28	490.84	762.28	576.98
77	582.56	445.44	703.40	537.76	828.50	633.32
78	632.66	482.28	744.08	567.12	886.34	675.50
79	681.52	524.72	787.12	605.88	958.10	737.44

EXHIBIT XIV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

3 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	59.78	45.22	125.54	94.92	173.96	131.54
51	59.78	45.22	125.54	94.92	173.96	131.54
52	59.78	45.22	125.54	94.92	173.96	131.54
53	59.78	45.22	125.54	94.92	173.96	131.54
54	59.78	45.22	125.54	94.92	173.96	131.54
55	59.78	45.22	125.54	94.92	173.96	131.54
56	64.52	49.92	135.40	104.76	186.38	144.20
57	70.70	54.64	148.48	114.84	206.12	159.38
58	79.08	60.40	166.04	126.82	223.68	170.76
59	86.54	65.14	178.06	134.12	238.04	179.36
60	94.28	74.14	190.06	149.54	255.16	200.76
61	104.14	84.40	199.06	161.32	266.54	215.98
62	114.40	90.64	210.16	166.48	275.30	222.38
63	131.14	105.84	229.88	185.52	292.90	236.30
64	144.82	114.22	244.90	193.04	313.88	247.46
65	159.20	130.06	257.30	210.38	326.30	261.38
66	172.70	138.40	270.16	216.60	340.44	272.92
67	194.52	154.48	296.08	235.22	373.20	296.50
68	215.52	175.48	323.72	263.52	412.00	335.30
69	239.32	190.24	349.22	277.66	443.06	352.22
70	263.92	209.54	374.06	296.96	495.34	393.14
71	287.08	227.96	397.84	316.04	500.68	397.64
72	319.90	254.52	430.00	342.16	528.98	421.00
73	356.52	286.66	467.90	376.22	563.04	452.68
74	389.72	313.66	499.20	401.72	595.82	479.48
75	432.36	343.66	540.14	429.34	647.88	515.04
76	474.34	375.58	577.82	457.42	679.36	537.76
77	525.12	419.72	634.18	506.72	746.86	596.68
78	572.90	456.56	673.80	536.90	802.56	639.52
79	612.96	493.18	707.86	569.68	861.48	693.28

EXHIBIT XIV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

2 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	50.36	37.70	105.62	79.28	146.56	109.90
51	50.36	37.70	105.62	79.28	146.56	109.90
52	50.36	37.70	105.62	79.28	146.56	109.90
53	50.36	37.70	105.62	79.28	146.56	109.90
54	50.36	37.70	105.62	79.28	146.56	109.90
55	50.36	37.70	105.62	79.28	146.56	109.90
56	56.14	40.48	118.06	85.06	162.62	117.20
57	60.64	45.84	127.28	96.40	176.76	133.92
58	66.62	51.22	139.68	107.78	188.08	145.06
59	72.44	55.28	149.12	114.00	199.46	152.32
60	82.68	60.86	166.90	122.54	219.82	164.54
61	88.70	66.22	169.46	126.40	226.90	169.24
62	100.48	75.62	184.68	138.84	241.90	177.60
63	110.98	80.98	194.32	142.06	247.66	181.06
64	127.04	91.68	214.90	155.12	275.52	198.84
65	139.06	101.36	224.74	163.70	290.74	211.66
66	155.32	112.06	242.74	175.28	305.74	220.88
67	171.40	121.48	261.16	184.90	329.06	233.12
68	189.20	136.28	284.08	204.60	361.44	260.32
69	205.48	147.20	299.96	214.68	380.50	272.30
70	221.74	161.96	314.30	229.66	416.06	304.00
71	244.04	176.76	338.06	245.08	425.48	308.52
72	266.08	193.04	357.58	259.46	439.88	319.22
73	288.36	212.52	378.36	278.96	455.28	335.74
74	316.46	232.90	405.36	298.22	483.76	355.88
75	348.80	253.68	436.00	317.08	522.98	380.30
76	382.88	278.08	466.42	338.74	548.28	398.30
77	415.44	303.80	501.56	366.76	590.68	431.90
78	449.50	329.30	528.56	387.36	629.44	461.48
79	487.84	355.00	563.44	410.06	685.80	499.20
80		384.76				
81		415.64				
82		450.76				
83		485.90				
84		531.76				

State: *Virginia* **Filing Company:** *RiverSource Life Insurance Company*
TOI/Sub-TOI: *LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*
Product Name: *Long Term Care*
Project Name/Number: *30240 2013/30240 2013*

Supporting Document Schedules

Satisfied - Item:	Certification of Compliance
Comments:	Please see Actuarial Memorandom
Attachment(s):	
Item Status:	Received & Acknowledged
Status Date:	12/03/2014

Satisfied - Item:	L&H Actuarial Memorandum
Comments:	
Attachment(s):	VA Revised_ActMem_30240_20140530.pdf
Item Status:	Received & Acknowledged
Status Date:	12/03/2014

Satisfied - Item:	Cover Letter
Comments:	
Attachment(s):	VA CovLtr_30240_R20130801.pdf Milliman_Involvement_VA_30240_20130801.pdf
Item Status:	Received & Acknowledged
Status Date:	01/14/2014

Satisfied - Item:	Rate Revision Checklist
Comments:	
Attachment(s):	VA Rate_Revision_Checklist_30240_20130801.pdf
Item Status:	Received & Acknowledged
Status Date:	01/14/2014

Satisfied - Item:	Response 12-3-13
Comments:	
Attachment(s):	VA Response_30240_20131203.pdf VA Response_Attachments_30240_20131203.xlsx
Item Status:	Received & Acknowledged
Status Date:	01/14/2014

Satisfied - Item:	Response 2-19-14
Comments:	

State: *Virginia* **Filing Company:** *RiverSource Life Insurance Company*
TOI/Sub-TOI: *LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*
Product Name: *Long Term Care*
Project Name/Number: *30240 2013/30240 2013*

Attachment(s):	VA Response_30240_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_30240_20140219.pdf
Item Status:	Received & Acknowledged
Status Date:	12/03/2014

Satisfied - Item:	Response 5-30-14
Comments:	
Attachment(s):	VA Response_30240_20140530.pdf VA Rate Request Summary_30240_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
Item Status:	Received & Acknowledged
Status Date:	12/03/2014

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30240 2013/30240 2013

Attachment VA Response_Attachments_30240_20131203.xlsx is not a PDF document and cannot be reproduced here.

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Actuarial Memorandum for 30240 Series

May 2014

Policy forms 30240-VA and 30240-VA1 are individual policy forms providing benefits to individuals for confinement in a nursing home. These forms were issued in Virginia from August 15, 1989 to May 15, 1993.

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

These are individually underwritten policy forms which pay a daily benefit for confinement in a nursing home. The payments commence after an elimination period of 20 or 100 days depending on the plan chosen. No prior hospitalization is required.

After discharge from the nursing home, a post confinement benefit is also payable for up to as many days as nursing home benefits were received. The amount paid will be equal to the following percentage of the daily benefit paid on the last day of the insured's most recent nursing home stay: 70% for the first 30 days, 60% for the next 30 days, and 50% for each day thereafter. The absolute maximum benefit period for both the nursing home benefit and the post confinement benefit is 2, 3, or 4 years, or unlimited, again depending on the plan chosen at issue. Premiums which become due during a nursing home stay after benefits have been paid for at least 90 days beyond the elimination period are waived.

Benefit eligibility for nursing home coverage is based on any one of the following: sickness or injury, 3 or more Activities of Daily Living (ADL) deficiencies out of 6 ADLs, or cognitive impairment. As defined in the policy, the 6 ADLs are: Bathing, Dressing, Toileting, Continence, Transferring, and Feeding.

An insured can elect at issue an option that will increase the benefit by a fixed amount (5% of the initial benefit) per year from the second year through the anniversary following the insured's 85th birthday ("Simple BIO") or will increase the previous year's daily benefit by 5% per year from the second year on for life ("Compound BIO"). The benefit will remain level thereafter. The increasing benefit is applicable even if the policy is in claim status. Simple BIO is available in all states, whereas Compound BIO is only available in some states. In Virginia, Simple BIO is available for both forms 30240-VA and 30240-VA1, while the Compound BIO is only available for form 30240-VA1.

3. Renewability

These policy forms are guaranteed renewable for life.

4. Applicability

This filing is applicable to inforce policies only, as these policy forms are no longer being sold in the market. The premium changes will apply to the base forms but not the optional home care rider.

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.

<u>Morbidity</u>
Expected claim costs are the product of original pricing expected claim costs and an actual-to-expected adjustment factor.

Pricing frequencies and severities of claims were originally developed using 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 identifiable for the combinations of elimination periods and maximum benefit limits. This data represented the expected claim costs of the non-increasing benefit nursing home stay. A loading in claim costs was then applied for both the post confinement benefit and waiver of premium benefits. Claim costs for the increasing benefit plan were adjusted appropriately to reflect the 5% annual increase.

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

RIVERSOURCE LIFE INSURANCE COMPANY

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Actuarial Memorandum for 30240 Series

May 2014

Lifetime Benefit Actual-to-Expected Adjustment Factors

	Age at Issue						
Duration	**<53**	**53–57**	**58–62**	**63–67**	**68–72**	**73–77**	**78+**
1	0.45	0.45	0.80	0.90	1.30	1.70	1.70
2	0.45	0.45	0.85	0.95	1.30	1.70	1.70
3	0.50	0.50	0.85	0.95	1.30	1.70	1.70
4	0.50	0.50	0.90	1.00	1.30	1.70	1.70
5	0.50	0.50	0.90	1.10	1.30	1.70	1.70
6	0.50	0.50	0.90	1.20	1.30	1.35	1.40
7	0.50	0.50	0.95	1.20	1.30	1.35	1.40
8	0.50	0.50	1.00	1.30	1.30	1.35	1.40
9	0.50	0.50	1.05	1.30	1.30	1.35	1.40
10	0.65	0.65	1.10	1.35	1.35	1.35	1.40
11	0.70	0.70	1.15	1.45	1.40	1.35	1.40
12	0.75	0.75	1.20	1.45	1.40	1.35	1.40
13	0.80	0.80	1.25	1.45	1.40	1.35	1.40
14	0.85	0.85	1.30	1.45	1.40	1.35	1.40
15	0.90	0.90	1.35	1.45	1.50	1.35	1.40
16	0.95	0.95	1.40	1.50	1.55	1.35	1.40
17	0.95	1.00	1.45	1.60	1.60	1.35	1.40
18	0.95	1.10	1.50	1.70	1.65	1.35	1.40
19	0.95	1.10	1.50	1.70	1.65	1.35	1.40
20	0.95	1.10	1.50	1.70	1.70	1.35	1.40
21	0.95	1.10	1.50	1.70	1.70	1.35	1.40
22	0.95	1.10	1.50	1.70	1.70	1.35	1.40
23	1.00	1.10	1.50	1.70	1.70	1.35	1.40
24	1.00	1.10	1.50	1.70	1.70	1.35	1.40
25	1.05	1.10	1.50	1.70	1.70	1.40	1.40
26	1.05	1.10	1.50	1.70	1.70	1.40	1.40
27	1.05	1.10	1.50	1.70	1.70	1.40	1.45
28	1.05	1.10	1.50	1.70	1.70	1.45	1.45
29	1.05	1.10	1.50	1.70	1.70	1.45	1.45
30+	1.10	1.10	1.50	1.70	1.70	1.45	1.45

RIVERSOURCE LIFE INSURANCE COMPANY

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Actuarial Memorandum for 30240 Series

May 2014

Non-Lifetime Benefit Actual-to-Expected Adjustment Factors

	Age at Issue							
Duration	**<53**	**53–57**	**58–62**	**63–67**	**68–72**	**73–77**	**78-82**	**83+**
1	0.20	0.20	0.25	0.45	0.75	0.80	0.80	1.70
2	0.20	0.20	0.30	0.55	0.75	0.80	1.15	1.70
3	0.20	0.20	0.35	0.55	0.80	0.80	1.25	1.70
4	0.25	0.25	0.45	0.65	0.80	0.95	1.40	1.70
5	0.25	0.25	0.50	0.65	0.80	1.00	1.40	1.70
6	0.30	0.30	0.55	0.70	0.90	1.00	1.40	1.70
7	0.30	0.30	0.55	0.70	0.90	1.00	1.40	1.70
8	0.30	0.30	0.60	0.80	1.00	1.00	1.40	1.70
9	0.35	0.35	0.60	0.80	1.00	1.20	1.40	1.70
10	0.35	0.35	0.65	0.90	1.00	1.20	1.40	1.70
11	0.35	0.35	0.70	0.95	1.20	1.20	1.40	1.65
12	0.35	0.45	0.75	1.00	1.20	1.20	1.40	1.65
13	0.35	0.45	0.80	1.05	1.20	1.25	1.40	1.65
14	0.35	0.50	0.85	1.10	1.20	1.25	1.40	1.65
15	0.35	0.55	0.90	1.15	1.20	1.30	1.40	1.65
16	0.35	0.55	0.90	1.15	1.40	1.30	1.40	1.65
17	0.55	0.65	1.00	1.15	1.40	1.30	1.40	1.65
18	0.55	0.75	1.05	1.15	1.40	1.30	1.40	1.70
19	0.55	0.75	1.05	1.15	1.40	1.30	1.40	1.80
20	0.75	0.75	1.05	1.15	1.40	1.30	1.40	1.80
21	0.75	0.75	1.05	1.15	1.40	1.30	1.40	1.80
22	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
23	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
24	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
25	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
26	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
27	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
28	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
29	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
30	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
31	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
32	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
33	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
34	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
35+	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80

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.

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 99.7%. This experience is based on 8,695 actual claims (5,026 lifetime and 3,669 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 30240, 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.

<u>Mortality</u>
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%.

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). 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. 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 9,255 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

Adverse selection of 2.8% in the year of rate increase notification to policyholders grading down to 0% in the 4th year after rate increase notification is assumed.

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

2005, 2008, 2009 and 2013 so that total commissions paid before and after the past sought nationwide increases in premium are similar.

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

Exhibit VI provides the assumptions used in the 2004 rate increase filing, Exhibit VII provides the assumptions used in the 2008 rate increase filing and Exhibit VIII provides the assumptions used in the 2011 rate increase filing.

6. Marketing Method

These policy forms were marketed by agents of RiverSource Life.

7. Underwriting Description

These policy forms were 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 benefit limit, the initial daily benefit, the elimination period, and the Benefit Increase Option.

9. Issue Age Range

The issue ages are from 50 to 79 except for the benefit structure with 2-year benefit period, 100-day elimination period with no Benefit Increase Option, which is 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):

Premium Mode	Modal Factors	Percent Distribution
Annual	1.0000*AP + 0.0	46.3%
Semi-Annual	0.5020*AP+ 0.4	10.8%
Quarterly	0.2580*AP+ 0.5	8.6%
Monthly	0.0868*AP+ 0.6	34.3%

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 XI and XII.

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 30240 is shown in Exhibit IX, and Virginia experience for policy forms 30240-VA and 30240-VA1 is shown in Exhibit X. Exhibit XI shows nationwide past experience including earned premiums, incurred claims, increase in active life reserves and incurred loss ratios by calendar year, and Exhibit XII 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 to be 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 <u>illustration</u> 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* for 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

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 IX, X, XI and XII 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 IX, X, XI and XII 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 IX and X 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 7.5%, 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 XI and XII 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

Three prior increases have been approved and implemented on these forms. A 29% increase was approved in November 2005 and implemented on each contract's next policy anniversary beginning in March 2006. A 15% increase was approved in March 2009 and implemented on each contract's next policy anniversary beginning in June 2009. A 20.3% 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 X and XII reflect the impact of these increases.

The actual and projected premiums in Exhibits IX and XI reflect the accumulated rate increases as approved in Virginia and implemented from 2006 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 20%.

Projected experience assuming this increase is implemented is shown in Exhibits IX and X. Exhibit XIII 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 these forms are included with this memorandum in Exhibit XIV, and corresponding rate tables with the requested rate increase are included with this memorandum in Exhibit XV.

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

Before increase:	$1,231
After increase:	$1,476

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:

Issue Ages	Percent Distribution
<55	9.0%
55-59	24.5%
60-64	35.5%
65-69	22.6%
70-74	7.3%
75-79	1.0%
>79	0.1%

By Elimination Period:

Elimination Period	Percent Distribution
20-day	32.0%
100-day	68.0%

By Benefit Period:

Benefit Period	Percent Distribution
2-Year	3.6%
3-Year	6.4%
4-Year	22.6%
Unlimited	67.4%

By Inflation Protection Option:

Inflation Option	Percent Distribution
None	38.6%
Simple to Age 85	59.9%
Compound for Life	1.5%

20. Number of Policyholders

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

	Number of Insured	Nursing Home Annual Premium
Virginia	439	$540,213
Nationwide	15,465	$19,032,381

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 standards set forth in 14 VAC 5-200-150(B).

Anju Gupta-Lavey

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 Forms: 30240-VA and 30240-VA1

Original Pricing Assumptions

Mortality: 1983 Individual Annuitant Mortality Table

Lapse Rates:

Duration	Rate
1	11%
2	8%
3	7%
4	6%
5+	5%

Morbidity: Pricing frequencies and severities of claims were originally developed using 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 identifiable for the combinations of elimination periods and maximum benefit limits. This data represented the expected claim costs of the non-increasing benefit nursing home stay. A loading in claim costs was then applied for both the post confinement benefit and waiver of premium benefits. Claim costs for the increasing benefit plan were adjusted appropriately to reflect the 5% annual increase.

The following selection factors were used:

Duration	Factor
1	40%
2	50%
3	60%
4	70%
5	80%
6	90%
7+	100%

Interest Rate: 7.5%

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

Policy Forms: 30240-VA and 30240-VA1

Current Assumptions

Mortality: 1983 Individual Annuitant Mortality Basic Table with selection.

Mortality Selection Factors

	Issue Age Band					
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%	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 Forms: 30240-VA and 30240-VA1

Current Assumptions (continued)

Lapse Rates:

Lifetime Benefit

	Issue Age Band		
Duration	<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%

Non-Lifetime Benefit

	Issue Age Band		
Duration	<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%

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.

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

Policy Forms: 30240-VA and 30240-VA1

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

	Issue Age Band						
Duration	<53	53–57	58–62	63–67	68–72	73–77	78+
1	0.45	0.45	0.80	0.90	1.30	1.70	1.70
2	0.45	0.45	0.85	0.95	1.30	1.70	1.70
3	0.50	0.50	0.85	0.95	1.30	1.70	1.70
4	0.50	0.50	0.90	1.00	1.30	1.70	1.70
5	0.50	0.50	0.90	1.10	1.30	1.70	1.70
6	0.50	0.50	0.90	1.20	1.30	1.35	1.40
7	0.50	0.50	0.95	1.20	1.30	1.35	1.40
8	0.50	0.50	1.00	1.30	1.30	1.35	1.40
9	0.50	0.50	1.05	1.30	1.30	1.35	1.40
10	0.65	0.65	1.10	1.35	1.35	1.35	1.40
11	0.70	0.70	1.15	1.45	1.40	1.35	1.40
12	0.75	0.75	1.20	1.45	1.40	1.35	1.40
13	0.80	0.80	1.25	1.45	1.40	1.35	1.40
14	0.85	0.85	1.30	1.45	1.40	1.35	1.40
15	0.90	0.90	1.35	1.45	1.50	1.35	1.40
16	0.95	0.95	1.40	1.50	1.55	1.35	1.40
17	0.95	1.00	1.45	1.60	1.60	1.35	1.40
18	0.95	1.10	1.50	1.70	1.65	1.35	1.40
19	0.95	1.10	1.50	1.70	1.65	1.35	1.40
20	0.95	1.10	1.50	1.70	1.70	1.35	1.40
21	0.95	1.10	1.50	1.70	1.70	1.35	1.40
22	0.95	1.10	1.50	1.70	1.70	1.35	1.40
23	1.00	1.10	1.50	1.70	1.70	1.35	1.40
24	1.00	1.10	1.50	1.70	1.70	1.35	1.40
25	1.05	1.10	1.50	1.70	1.70	1.40	1.40
26	1.05	1.10	1.50	1.70	1.70	1.40	1.40
27	1.05	1.10	1.50	1.70	1.70	1.40	1.45
28	1.05	1.10	1.50	1.70	1.70	1.45	1.45
29	1.05	1.10	1.50	1.70	1.70	1.45	1.45
30+	1.10	1.10	1.50	1.70	1.70	1.45	1.45

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

Policy Forms: 30240-VA and 30240-VA1

Current Assumptions (continued)

Morbidity (continued):

Non-Lifetime Benefit Actual-to-Expected Adjustment Factors

	Age at Issue							
Duration	<53	53–57	58–62	63–67	68–72	73–77	78-82	83+
1	0.20	0.20	0.25	0.45	0.75	0.80	0.80	1.70
2	0.20	0.20	0.30	0.55	0.75	0.80	1.15	1.70
3	0.20	0.20	0.35	0.55	0.80	0.80	1.25	1.70
4	0.25	0.25	0.45	0.65	0.80	0.95	1.40	1.70
5	0.25	0.25	0.50	0.65	0.80	1.00	1.40	1.70
6	0.30	0.30	0.55	0.70	0.90	1.00	1.40	1.70
7	0.30	0.30	0.55	0.70	0.90	1.00	1.40	1.70
8	0.30	0.30	0.60	0.80	1.00	1.00	1.40	1.70
9	0.35	0.35	0.60	0.80	1.00	1.20	1.40	1.70
10	0.35	0.35	0.65	0.90	1.00	1.20	1.40	1.70
11	0.35	0.35	0.70	0.95	1.20	1.20	1.40	1.65
12	0.35	0.45	0.75	1.00	1.20	1.20	1.40	1.65
13	0.35	0.45	0.80	1.05	1.20	1.25	1.40	1.65
14	0.35	0.50	0.85	1.10	1.20	1.25	1.40	1.65
15	0.35	0.55	0.90	1.15	1.20	1.30	1.40	1.65
16	0.35	0.55	0.90	1.15	1.40	1.30	1.40	1.65
17	0.55	0.65	1.00	1.15	1.40	1.30	1.40	1.65
18	0.55	0.75	1.05	1.15	1.40	1.30	1.40	1.70
19	0.55	0.75	1.05	1.15	1.40	1.30	1.40	1.80
20	0.75	0.75	1.05	1.15	1.40	1.30	1.40	1.80
21	0.75	0.75	1.05	1.15	1.40	1.30	1.40	1.80
22	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
23	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
24	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
25	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
26	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
27	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
28	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
29	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
30	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
31	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
32	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
33	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
34	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
35+	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80

The following adverse selection factors are used:

Year of Policyholder Notification *	Without Current Requested Increase	With Current Requested Increase
1	0.0%	2.8%
2	0.0%	1.8%
3	0.0%	0.8%
4	0.0%	0.0%

* For currently requested increase

Interest Rate: 7.5%

EXHIBIT II
RiverSource Life Insurance Company
Nationwide Nursing Home Claim Experience
For Policy Anniversaries through 2011
Policy Form: 30240
Expected Claims Based on Current Assumptions

SPLIT BY BENEFIT PERIOD AND DURATION									
	Lifetime Benefit Period			Non-Lifetime Benefit Period			All		
Duration	Actual	Expected	A/E	Actual	Expected	A/E	Actual	Expected	A/E
1	789,358	677,271	116.5%	384,639	356,589	107.9%	1,173,997	1,033,860	113.6%
2	2,580,958	2,424,853	106.4%	1,263,462	1,309,491	96.5%	3,844,419	3,734,344	102.9%
3	4,939,263	4,836,165	102.1%	2,432,574	2,498,556	97.4%	7,371,838	7,334,721	100.5%
4	6,348,745	6,849,268	92.7%	4,640,887	3,688,642	125.8%	10,989,632	10,537,909	104.3%
5	7,564,373	8,396,886	90.1%	4,217,664	4,341,175	97.2%	11,782,036	12,738,060	92.5%
6	12,152,822	9,288,847	130.8%	4,530,005	5,180,844	87.4%	16,682,827	14,469,691	115.3%
7	10,444,924	11,684,916	89.4%	6,278,334	6,210,425	101.1%	16,723,258	17,895,341	93.5%
8	12,526,103	13,371,042	93.7%	6,290,152	7,020,112	89.6%	18,816,255	20,391,154	92.3%
9	14,234,562	14,960,346	95.1%	8,747,145	7,942,864	110.1%	22,981,707	22,903,210	100.3%
10	15,356,326	17,137,978	89.6%	6,621,584	8,563,397	77.3%	21,977,910	25,701,375	85.5%
11	19,979,008	19,678,106	101.5%	10,222,945	9,680,309	105.6%	30,201,953	29,358,415	102.9%
12	21,436,840	21,758,653	98.5%	9,602,448	10,259,360	93.6%	31,039,287	32,018,014	96.9%
13	23,873,876	23,636,122	101.0%	10,860,623	10,750,013	101.0%	34,734,499	34,386,136	101.0%
14	23,962,733	25,361,904	94.5%	11,078,848	11,088,453	99.9%	35,041,582	36,450,357	96.1%
15	27,800,789	27,371,470	101.6%	10,896,842	11,546,194	94.4%	38,697,631	38,917,664	99.4%
16	29,302,900	29,900,056	98.0%	11,319,283	12,356,100	91.6%	40,622,183	42,256,155	96.1%
17	30,529,534	32,971,464	92.6%	12,848,376	12,692,559	101.2%	43,377,910	45,664,022	95.0%
18	38,026,549	36,033,543	105.5%	13,858,816	12,922,997	107.2%	51,885,365	48,956,540	106.0%
19	37,363,589	35,117,248	106.4%	11,293,574	11,805,151	95.7%	48,657,163	46,922,399	103.7%
20	27,962,577	27,201,790	102.8%	10,703,221	8,357,522	128.1%	38,665,798	35,559,312	108.7%
21	15,693,682	16,850,558	93.1%	4,976,382	4,802,731	103.6%	20,670,064	21,653,288	95.5%
22	3,516,328	2,738,567	128.4%	1,550,522	854,859	181.4%	5,066,850	3,593,426	141.0%
Total	**386,385,840**	**388,247,051**	**99.5%**	**164,618,324**	**164,228,342**	**100.2%**	**551,004,164**	**552,475,394**	**99.7%**

SPLIT BY ISSUE AGE				
Issue Age	Actual	Expected	A/E	Claim Count
<53	1,038,927	1,497,067	69.4%	15
53-57	12,075,335	12,353,057	97.8%	135
58-62	67,938,593	66,991,688	101.4%	741
63-67	159,844,027	160,179,623	99.8%	2,033
68-72	165,831,688	165,987,063	99.9%	2,661
73-77	102,001,618	103,330,628	98.7%	1,961
78-82	37,747,811	37,519,658	100.6%	970
83+	4,526,165	4,616,611	98.0%	179
Total	**551,004,164**	**552,475,394**	**99.7%**	**8,695**

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

SUMMARY BY DURATION				
Duration	Actual Deaths	Expected Deaths	A/E	Difference
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
Total	**32,715**	**32,779**	**100%**	**(64)**

SUMMARY BY ISSUE AGE				
Issue Age	Actual Deaths	Expected Deaths	A/E	Difference
<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
Total	**32,715**	**32,779**	**100%**	**(64)**

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

EXHIBIT IV
RiverSource Life Insurance Company
Lapses and Benefit Reductions[1]
Nationwide Experience
Experience Includes All Long-Term Care Forms Combined

Additional Lapses Due to Rate Increase									
Increase Percent	Average Increase	Year of Increase							Weighted Average
		2005	2006	2007	2008	2009	2010	2011	
< 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%
Total	16.3%	2.6%	2.5%	1.3%	1.8%	1.9%	1.5%	1.4%	1.9%

Policies Choosing Reduction in Benefits in Relation to Rate Increase Percentage									
Increase Percent	Average Increase	Year of Increase							Weighted Average
		2005	2006	2007	2008	2009	2010	2011	
< 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%
Total	16.3%	1.4%	1.3%	0.8%	0.7%	0.8%	0.7%	0.8%	0.9%

[1] 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																
	Issue Ages 35-62				Issue Ages 63-72				Issue Ages 73+				All Issue Ages			
		Actual		Expected		Actual		Expected		Actual		Expected		Actual		Expected
Duration	Lapses	Exposure	Rate	Lapses	Lapses	Exposure	Rate	Lapses	Lapses	Exposure	Rate	Lapses	Lapses	Exposure	Rate	Lapses
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																
	Issue Ages 35-62				Issue Ages 63-72				Issue Ages 73+				All Issue Ages			
		Actual		Expected		Actual		Expected		Actual		Expected		Actual		Expected
Duration	Lapses	Exposure	Rate	Lapses	Lapses	Exposure	Rate	Lapses	Lapses	Exposure	Rate	Lapses	Lapses	Exposure	Rate	Lapses
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 2004 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2004 Rate Increase Filing Assumptions:

Mortality: 1983 Individual Annuitant Mortality Basic Table with selection.

Mortality Selection Factors

	Issue Age Band		
Duration	<66	63-72	73+
1	20%	20%	20%
2	25%	30%	25%
3	35%	50%	35%
4	55%	50%	40%
5	60%	50%	45%
6	60%	65%	75%
7	60%	65%	75%
8	75%	80%	80%
9	75%	80%	95%
10	75%	85%	95%
11	80%	85%	95%
12	80%	85%	95%
13	85%	90%	100%
14	85%	90%	100%
15	90%	95%	100%
16	90%	95%	100%
17	95%	100%	100%
18	95%	100%	100%
19	95%	100%	100%
20+	100%	100%	100%

EXHIBIT VI
RiverSource Life Insurance Company
Prior 2004 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2004 Rate Increase Filing Assumptions (cont):

Voluntary Lapse Rates:

Lifetime Benefit

	Issue Age Band		
Duration	<63	63-72	73+
1	7.0%	5.5%	3.5%
2	7.0%	5.5%	3.5%
3	5.5%	4.5%	3.5%
4	4.5%	3.0%	2.5%
5	3.0%	2.3%	2.0%
6	2.0%	1.8%	1.8%
7	1.5%	1.3%	1.5%
8	1.2%	1.2%	1.3%
9	1.0%	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%	0.9%	1.3%
17	0.9%	1.0%	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%

Non-Lifetime Benefit

	Issue Age Band		
Duration	<63	63-72	73+
1	6.0%	5.5%	4.0%
2	6.0%	4.5%	4.0%
3	5.0%	3.5%	3.7%
4	3.8%	3.0%	3.3%
5	2.8%	2.5%	2.6%
6	2.2%	2.2%	2.6%
7	1.6%	1.9%	2.6%
8	1.3%	1.5%	2.8%
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%	4.0%
13	1.2%	1.3%	4.0%
14	1.2%	1.3%	4.0%
15	1.2%	1.4%	4.0%
16	1.2%	1.6%	4.0%
17	1.2%	1.8%	4.0%
18	1.2%	2.1%	4.0%
19	1.2%	2.4%	4.0%
20	1.2%	2.7%	4.0%
21	1.2%	3.5%	4.0%
22	1.2%	3.7%	4.0%
23	1.2%	3.8%	4.0%
24	1.2%	3.9%	4.0%
25	1.4%	4.0%	4.0%
26	1.5%	4.0%	4.0%
27	1.6%	4.0%	4.0%
28	1.3%	4.0%	4.0%
29	1.5%	4.0%	4.0%
30	1.8%	4.0%	4.0%
31	2.0%	4.0%	4.0%
32	2.0%	4.0%	4.0%
33+	2.0%	4.0%	4.0%

In the year of rate increase notification to policyholders, an additional 5.0% of inforce policyholders is assumed to lapse.

EXHIBIT VI
RiverSource Life Insurance Company
Prior 2004 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2004 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 (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 2003.

Lifetime Benefit Actual-to-Expected Adjustment Factors

	Issue Age Band					
Duration	<58	58-62	63-67	68-72	73-77	78+
1	0.20	0.28	0.40	0.56	0.60	0.56
2	0.33	0.46	0.65	0.91	0.98	0.91
3	0.35	0.49	0.70	0.98	1.05	0.98
4	0.40	0.56	0.80	1.12	1.20	1.12
5	0.43	0.60	0.85	1.19	1.28	1.19
6	0.45	0.63	0.95	1.17	1.35	1.26
7	0.50	0.80	1.10	1.20	1.50	1.50
8	0.50	0.80	1.15	1.20	1.50	1.50
9	0.50	0.90	1.15	1.20	1.50	1.60
10	0.50	0.90	1.15	1.20	1.50	1.60
11	0.50	1.00	1.15	1.25	1.50	1.65
12	0.60	1.00	1.20	1.30	1.50	1.65
13	0.60	1.00	1.20	1.30	1.50	1.65
14	0.70	1.05	1.20	1.30	1.50	1.65
15	0.70	1.05	1.20	1.30	1.50	1.65
16	0.80	1.05	1.20	1.30	1.50	1.65
17	0.80	1.10	1.20	1.30	1.50	1.65
18	0.90	1.10	1.20	1.30	1.50	1.65
19	0.90	1.10	1.20	1.30	1.50	1.65
20	1.00	1.10	1.20	1.30	1.50	1.65
21	1.00	1.10	1.20	1.30	1.50	1.65
22	1.05	1.10	1.20	1.30	1.50	1.65
23	1.05	1.10	1.20	1.30	1.50	1.65
24	1.10	1.10	1.20	1.30	1.50	1.65
25+	1.10	1.10	1.20	1.30	1.50	1.65

EXHIBIT VI
RiverSource Life Insurance Company
Prior 2004 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2004 Rate Increase Filing Assumptions (cont):

Morbidity (continued): **Non-Lifetime Benefit Actual-to-Expected Adjustment Factors**

	Age at Issue						
Duration	<58	58-62	63-67	68-72	73-77	78-82	83+
1	0.04	0.08	0.20	0.32	0.36	0.56	1.85
2	0.07	0.13	0.33	0.52	0.59	0.91	1.85
3	0.14	0.21	0.35	0.56	0.67	0.98	1.85
4	0.16	0.24	0.40	0.72	0.76	1.16	1.90
5	0.26	0.34	0.43	0.77	0.85	1.23	1.90
6	0.27	0.36	0.45	0.81	0.95	1.31	1.90
7	0.40	0.50	0.60	0.90	1.10	1.45	1.95
8	0.40	0.50	0.60	0.90	1.15	1.45	1.95
9	0.50	0.60	0.70	1.00	1.20	1.45	1.95
10	0.50	0.60	0.70	1.00	1.25	1.50	1.95
11	0.50	0.60	0.70	1.10	1.30	1.50	1.95
12	0.60	0.70	0.80	1.10	1.35	1.50	1.95
13	0.60	0.70	0.80	1.10	1.35	1.50	1.95
14	0.60	0.70	0.80	1.20	1.35	1.50	1.95
15	0.60	0.70	0.90	1.20	1.35	1.50	1.95
16	0.70	0.80	0.90	1.20	1.35	1.50	1.95
17	0.70	0.80	1.00	1.20	1.35	1.50	1.95
18	0.70	0.80	1.00	1.20	1.35	1.50	1.95
19	0.70	0.80	1.00	1.20	1.35	1.50	1.95
20	0.80	0.90	1.00	1.20	1.35	1.50	1.95
21	0.80	0.90	1.00	1.20	1.35	1.50	1.95
22	0.80	0.90	1.00	1.20	1.35	1.50	1.95
23	0.90	0.90	1.00	1.20	1.35	1.50	1.95
24	0.90	0.90	1.00	1.20	1.35	1.50	1.95
25+	0.90	0.90	1.00	1.20	1.35	1.50	1.95

An adverse selection assumption of 5% in the year of the rate increase notification to policyholders grading down to 0% in the 6th year after rate increase notification was also assumed.

Interest Rate: 7.5%

EXHIBIT VII
RiverSource Life Insurance Company
Prior 2008 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2008 Rate Increase Filing Assumptions:

Mortality: 1983 Individual Annuitant Mortality Basic Table with selection.

Mortality Selection Factors

	Issue Age Band				
Duration	<60	60-64	65-69	70-74	75+
1	15%	20%	20%	30%	20%
2	30%	25%	20%	35%	20%
3	40%	45%	45%	40%	35%
4	40%	45%	50%	40%	40%
5	40%	45%	50%	40%	40%
6	50%	55%	60%	70%	75%
7	50%	55%	60%	70%	75%
8	50%	60%	65%	70%	75%
9	75%	75%	80%	85%	80%
10	75%	75%	80%	85%	80%
11	90%	75%	80%	85%	95%
12	90%	85%	90%	90%	100%
13	90%	85%	90%	90%	100%
14	95%	85%	90%	90%	100%
15	100%	85%	90%	100%	100%
16	100%	85%	90%	100%	100%
17	100%	100%	100%	100%	100%
18+	100%	100%	100%	100%	100%

EXHIBIT VII
RiverSource Life Insurance Company
Prior 2008 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2008 Rate Increase Filing Assumptions (cont)

Voluntary Lapse Rates:

Lifetime Benefit

	Issue Age Band		
Duration	<63	63-72	73+
1	7.0%	5.5%	3.5%
2	7.0%	5.5%	3.5%
3	5.5%	4.5%	3.5%
4	4.5%	3.0%	2.5%
5	2.6%	2.1%	2.0%
6	1.5%	1.7%	1.7%
7	1.3%	1.1%	1.3%
8	0.9%	1.1%	1.3%
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%	0.9%	1.3%
17	0.9%	1.0%	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%

Non-Lifetime Benefit

	Issue Age Band		
Duration	<63	63-72	73+
1	6.0%	5.5%	4.0%
2	6.0%	4.5%	4.0%
3	5.0%	3.5%	3.7%
4	3.8%	3.0%	3.3%
5	2.4%	2.0%	2.0%
6	1.8%	1.8%	2.0%
7	1.4%	1.6%	2.6%
8	1.2%	1.3%	2.8%
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%

An additional 2.5% of inforce policyholders was assumed to lapse plus a 2.5% reduction in benefits due to election of reduced benefit options in the year of rate increase notification to policyholders was also assumed.

EXHIBIT VII
RiverSource Life Insurance Company
Prior 2008 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2008 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 (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 December 2006.

Lifetime Benefit Actual-to-Expected Adjustment Factors

	Issue Age Band						
Duration	< 53	53-57	58-62	63-67	68-72	73-77	78+
1	0.50	0.50	0.70	0.85	1.60	1.60	1.40
2	0.50	0.50	0.70	0.85	1.60	1.60	1.40
3	0.50	0.50	0.70	0.85	1.60	1.60	1.40
4	0.50	0.50	0.70	0.85	1.60	1.50	1.40
5	0.50	0.50	0.70	0.85	1.60	1.30	1.40
6	0.50	0.50	0.70	1.10	1.30	1.30	1.65
7	0.50	0.50	0.80	1.15	1.20	1.30	1.65
8	0.50	0.50	0.80	1.25	1.20	1.40	1.65
9	0.50	0.60	0.80	1.25	1.20	1.40	1.65
10	0.50	0.60	0.80	1.25	1.20	1.40	1.45
11	0.50	0.60	1.05	1.25	1.25	1.40	1.45
12	0.60	0.60	1.05	1.25	1.40	1.40	1.45
13	0.60	0.60	1.10	1.25	1.40	1.40	1.45
14	0.60	0.70	1.10	1.20	1.40	1.35	1.45
15	0.60	0.70	1.10	1.20	1.40	1.35	1.45
16	0.60	0.85	1.10	1.20	1.40	1.35	1.45
17	0.60	0.85	1.10	1.20	1.40	1.35	1.45
18	0.60	0.95	1.10	1.20	1.30	1.35	1.45
19	0.70	0.95	1.10	1.20	1.30	1.35	1.45
20	0.70	1.10	1.10	1.20	1.30	1.35	1.45
21	0.85	1.10	1.10	1.20	1.30	1.35	1.45
22	0.85	1.10	1.10	1.20	1.30	1.35	1.45
23	0.95	1.10	1.10	1.20	1.30	1.35	1.45
24	0.95	1.10	1.10	1.20	1.30	1.35	1.45
25+	1.10	1.10	1.10	1.20	1.30	1.35	1.45

EXHIBIT VII
RiverSource Life Insurance Company
Prior 2008 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2008 Rate Increase Filing Assumptions (cont)

Morbidity (continued): **Non-Lifetime Benefit Actual-to-Expected Adjustment Factors**

	Age at Issue							
Duration	< 53	53–57	58–62	63–67	68–72	73–77	78–82	83+
1	0.10	0.10	0.20	0.50	0.80	0.90	1.40	1.80
2	0.10	0.10	0.20	0.50	0.80	0.90	1.40	1.80
3	0.20	0.20	0.30	0.50	0.80	0.95	1.40	1.80
4	0.20	0.20	0.30	0.50	0.90	0.95	1.45	1.80
5	0.30	0.30	0.40	0.50	0.90	1.00	1.45	1.80
6	0.30	0.30	0.40	0.50	0.90	1.05	1.45	1.80
7	0.40	0.40	0.50	0.60	0.90	1.10	1.45	1.55
8	0.40	0.40	0.50	0.60	0.90	1.15	1.45	1.55
9	0.50	0.50	0.60	0.70	1.00	1.20	1.45	1.55
10	0.50	0.50	0.60	0.70	1.00	1.25	1.50	1.55
11	0.50	0.50	0.60	0.70	1.10	1.30	1.50	1.55
12	0.50	0.60	0.70	0.80	1.10	1.35	1.50	1.55
13	0.50	0.60	0.70	0.80	1.10	1.35	1.50	1.55
14	0.50	0.60	0.70	0.80	1.20	1.35	1.50	1.55
15	0.50	0.60	0.70	0.90	1.20	1.35	1.50	1.55
16	0.50	0.60	0.70	0.90	1.20	1.35	1.50	1.55
17	0.60	0.70	0.80	1.00	1.20	1.35	1.50	1.55
18	0.60	0.70	0.80	1.00	1.20	1.35	1.50	1.55
19	0.60	0.70	0.80	1.00	1.20	1.35	1.50	1.55
20	0.60	0.70	0.90	1.00	1.20	1.35	1.50	1.55
21	0.60	0.70	0.90	1.00	1.20	1.35	1.50	1.55
22	0.70	0.80	0.90	1.00	1.20	1.35	1.50	1.55
23	0.70	0.80	0.90	1.00	1.20	1.35	1.50	1.55
24	0.70	0.80	0.90	1.00	1.20	1.35	1.50	1.55
25	0.70	0.90	0.90	1.00	1.20	1.35	1.50	1.55
26	0.70	0.90	0.90	1.00	1.20	1.35	1.50	1.55
27+	0.80	0.90	0.90	1.00	1.20	1.35	1.50	1.55

An adverse selection assumption of 5% in the year of the rate increase notification to policyholders grading down to 0% in the 6th year after rate increase notification was also assumed.

Interest Rate: 4.5%

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Form: 30240-VA and 30240-VA1

Prior 2011 Rate Increase Filing Assumptions:

Mortality: 1983 Individual Annuitant Mortality Basic Table with selection.

Mortality Selection Factors

	Issue Age Band					
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 VIII
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Form: 30240-VA and 30240-VA1

Prior 2011 Rate Increase Filing Assumptions (cont):

Voluntary Lapse Rates:

Lifetime Benefit

	Issue Age Band		
Duration	<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%

Non-Lifetime Benefit

	Issue Age Band		
Duration	<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%

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.

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Form: 30240-VA and 30240-VA1

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

	Issue Age Band							
Duration	<48	48-52	53–57	58–62	63–67	68–72	73–77	78+
1	0.45	0.45	0.40	0.80	0.80	1.50	1.80	1.50
2	0.28	0.45	0.40	0.80	0.80	1.50	1.80	1.50
3	0.26	0.45	0.40	0.80	0.80	1.50	1.80	1.50
4	0.23	0.45	0.40	0.80	0.80	1.50	1.80	1.50
5	0.21	0.45	0.40	0.80	0.80	1.50	1.80	1.50
6	0.20	0.45	0.40	0.80	1.00	1.50	1.80	1.50
7	0.29	0.45	0.40	0.80	1.00	1.15	1.30	1.80
8	0.32	0.45	0.40	0.80	1.35	1.15	1.30	1.80
9	0.36	0.45	0.40	0.90	1.35	1.15	1.30	1.35
10	0.38	0.45	0.75	0.90	1.35	1.15	1.30	1.35
11	0.41	0.45	0.75	0.90	1.35	1.35	1.30	1.35
12	0.45	0.45	0.75	0.90	1.35	1.40	1.30	1.50
13	0.45	0.45	0.75	1.10	1.35	1.40	1.30	1.55
14	0.45	0.45	0.75	1.20	1.35	1.40	1.30	1.55
15	0.45	0.45	0.75	1.40	1.35	1.55	1.30	1.55
16	0.45	0.45	0.75	1.40	1.35	1.55	1.30	1.55
17	0.45	0.50	0.80	1.40	1.50	1.55	1.40	1.55
18	0.45	0.60	1.15	1.40	1.50	1.55	1.40	1.55
19	0.45	0.70	1.15	1.40	1.50	1.55	1.45	1.55
20	0.45	0.70	1.15	1.40	1.50	1.55	1.45	1.55
21	0.45	0.85	1.15	1.40	1.50	1.55	1.45	1.55
22	0.50	0.85	1.15	1.40	1.50	1.55	1.45	1.55
23	0.60	0.95	1.15	1.40	1.50	1.55	1.45	1.55
24	0.70	0.95	1.15	1.40	1.50	1.55	1.45	1.55
25	0.70	1.00	1.15	1.40	1.50	1.55	1.45	1.55
26	0.85	1.00	1.15	1.40	1.50	1.55	1.45	1.55
27	0.85	1.10	1.15	1.40	1.50	1.55	1.45	1.55
28	0.95	1.10	1.15	1.40	1.50	1.55	1.45	1.55
29	0.95	1.10	1.15	1.40	1.50	1.55	1.45	1.55
30	1.00	1.10	1.15	1.40	1.50	1.55	1.45	1.55
31	1.00	1.10	1.15	1.40	1.50	1.55	1.45	1.55
32+	1.10	1.10	1.15	1.40	1.50	1.55	1.45	1.55

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Form: 30240-VA and 30240-VA1

Prior 2011 Rate Increase Filing Assumptions (cont):

Morbidity (continued):

Non-Lifetime Benefit Actual-to-Expected Adjustment Factors

	Age at Issue								
Duration	**<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	0.30	0.75	0.85	1.40	1.80
2	0.06	0.10	0.10	0.20	0.30	0.75	0.85	1.40	1.80
3	0.06	0.10	0.10	0.20	0.30	0.75	0.85	1.40	1.80
4	0.05	0.10	0.10	0.30	0.50	0.85	0.95	1.40	1.80
5	0.05	0.20	0.20	0.30	0.50	0.85	0.95	1.40	1.80
6	0.04	0.20	0.20	0.50	0.50	0.85	0.95	1.40	1.80
7	0.07	0.20	0.20	0.60	0.50	0.85	0.95	1.40	1.70
8	0.07	0.20	0.20	0.60	0.50	0.85	1.00	1.40	1.70
9	0.08	0.30	0.30	0.60	0.65	0.85	1.25	1.40	1.55
10	0.17	0.30	0.30	0.60	0.65	0.85	1.25	1.40	1.55
11	0.18	0.30	0.40	0.60	0.65	1.10	1.25	1.40	1.55
12	0.20	0.30	0.40	0.60	1.00	1.10	1.25	1.40	1.55
13	0.20	0.30	0.50	0.60	1.10	1.10	1.25	1.40	1.55
14	0.30	0.40	0.50	0.85	1.10	1.10	1.25	1.40	1.55
15	0.30	0.40	0.50	0.85	1.10	1.20	1.25	1.40	1.55
16	0.30	0.40	0.50	0.85	1.10	1.40	1.25	1.45	1.55
17	0.30	0.60	0.60	0.85	1.10	1.40	1.30	1.50	1.55
18	0.30	0.60	0.70	1.00	1.10	1.40	1.30	1.50	1.55
19	0.40	0.60	0.70	1.00	1.10	1.40	1.30	1.50	1.55
20	0.40	0.60	0.70	1.00	1.10	1.40	1.30	1.50	1.55
21	0.40	0.60	0.70	1.00	1.10	1.40	1.30	1.50	1.55
22	0.60	0.60	0.80	1.00	1.10	1.40	1.30	1.50	1.55
23	0.60	0.70	0.80	1.00	1.10	1.40	1.30	1.50	1.55
24	0.60	0.70	0.80	1.00	1.10	1.40	1.30	1.50	1.55
25	0.60	0.70	0.90	1.00	1.10	1.40	1.30	1.50	1.55
26	0.60	0.70	0.90	1.00	1.10	1.40	1.30	1.50	1.55
27	0.60	0.80	0.90	1.00	1.10	1.40	1.30	1.50	1.55
28	0.70	0.80	0.90	1.00	1.10	1.40	1.30	1.50	1.55
29	0.70	0.80	0.90	1.00	1.10	1.40	1.30	1.50	1.55
30	0.70	0.90	0.90	1.00	1.10	1.40	1.30	1.50	1.55
31	0.70	0.90	1.00	1.00	1.10	1.40	1.30	1.50	1.55
32	0.80	0.90	1.00	1.00	1.10	1.40	1.30	1.50	1.55
33	0.80	0.95	1.00	1.00	1.10	1.40	1.30	1.50	1.55
34	0.80	0.95	1.00	1.00	1.10	1.40	1.30	1.50	1.55
35	0.90	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
36	0.90	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
37	0.90	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
38	0.95	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
39	0.95	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
40+	1.00	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55

The following adverse selection factors are used:

Year of Policyholder Notification *	Without Current Requested Increase	With Current Requested Increase
1	0.0%	2.8%
2	0.0%	1.8%
3	0.0%	0.8%
4	0.0%	0.0%

* For currently requested increase

Interest Rate: 7.5%

EXHIBIT IX
RiverSource Life Insurance Company
Nationwide Experience Projections with No Increase
Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis
Policy Form: 30240

			Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest						
	Calendar Year	Ending Policies Inforce	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
Historical Experience	1989	3,532	477,819	0	0	0.0%	0.0%	2,662,038	0	0	0.0%	0.0%	7.50%	5.5712
	1990	20,231	11,323,037	1,232	1,155	0.0%	0.0%	58,682,081	6,383	5,984	0.0%	0.0%	7.50%	5.1825
	1991	33,057	23,730,033	1,944	3,294,975	0.0%	13.9%	114,401,690	9,371	15,884,962	0.0%	13.9%	7.50%	4.8210
	1992	44,591	34,448,430	1,690,119	6,171,474	4.9%	17.9%	154,488,113	7,579,543	27,676,713	4.9%	17.9%	7.50%	4.4846
	1993	45,706	40,970,649	3,222,626	8,891,377	7.9%	21.7%	170,918,871	13,443,955	37,092,508	7.9%	21.7%	7.50%	4.1717
	1994	43,660	39,420,810	5,892,071	9,855,045	14.9%	25.0%	152,979,856	22,865,288	38,244,354	14.9%	25.0%	7.50%	3.8807
	1995	41,935	37,637,454	7,837,584	11,266,955	20.8%	29.9%	135,869,031	28,293,224	40,673,056	20.8%	29.9%	7.50%	3.6099
	1996	40,338	36,134,012	10,249,636	15,624,614	28.4%	43.2%	121,341,110	34,419,158	52,468,792	28.4%	43.2%	7.50%	3.3581
	1997	38,927	34,589,007	13,065,641	17,780,628	37.8%	51.4%	108,049,164	40,814,459	55,543,137	37.8%	51.4%	7.50%	3.1238
	1998	37,079	33,122,919	15,916,595	19,443,305	48.1%	58.7%	96,250,601	46,251,415	56,499,544	48.1%	58.7%	7.50%	2.9059
	1999	35,367	31,290,387	18,384,152	22,760,137	58.8%	72.7%	84,581,877	49,694,690	61,523,530	58.8%	72.7%	7.50%	2.7031
	2000	33,954	29,843,654	21,429,396	26,669,331	71.8%	89.4%	75,042,952	53,884,995	67,061,002	71.8%	89.4%	7.50%	2.5145
	2001	32,530	28,399,995	25,397,653	26,494,505	89.4%	93.3%	66,430,531	59,407,740	61,973,391	89.4%	93.3%	7.50%	2.3391
	2002	31,025	26,899,593	27,614,437	30,544,425	102.7%	113.5%	58,531,102	60,086,539	66,461,930	102.7%	113.5%	7.50%	2.1759
	2003	29,613	25,356,832	30,295,561	33,084,721	119.5%	130.5%	51,324,830	61,321,325	66,966,870	119.5%	130.5%	7.50%	2.0241
	2004	28,223	23,927,805	34,061,195	38,627,557	142.3%	161.4%	45,053,332	64,133,353	72,731,292	142.3%	161.4%	7.50%	1.8829
	2005	26,280	21,567,058	37,788,114	41,667,455	175.2%	193.2%	37,775,177	66,186,713	72,981,464	175.2%	193.2%	7.50%	1.7515
	2006	24,689	21,676,207	39,456,399	40,389,114	182.0%	186.3%	35,317,538	64,287,211	65,806,904	182.0%	186.3%	7.50%	1.6293
	2007	23,248	23,466,443	42,827,475	46,146,562	182.5%	196.6%	35,566,894	64,911,425	69,941,995	182.5%	196.6%	7.50%	1.5156
	2008	21,729	21,827,751	46,609,785	52,689,538	213.5%	241.4%	30,775,080	65,715,423	74,287,304	213.5%	241.4%	7.50%	1.4099
	2009	20,116	20,383,511	53,209,364	54,558,958	261.0%	267.7%	26,733,802	69,786,241	71,556,288	261.0%	267.7%	7.50%	1.3115
	2010	18,627	20,581,446	59,151,098	53,964,474	287.4%	262.2%	25,110,141	72,166,573	65,838,696	287.4%	262.2%	7.50%	1.2200
	2011	17,139	18,860,305	61,386,135	56,695,958	325.5%	300.6%	21,404,916	69,668,282	64,345,312	325.5%	300.6%	7.50%	1.1349
	2012	15,757	18,216,181	62,949,458	55,888,139	345.6%	306.8%	19,231,523	66,458,165	59,003,259	345.6%	306.8%	7.50%	1.0557
	1/2013-3/2013	15,465	4,673,528	16,085,355	17,202,549	344.2%	368.1%	4,715,969	16,231,428	17,358,767	344.2%	368.1%	7.50%	1.0091
Projected Future Experience	4/2013-12/2013	14,382	13,692,096	43,599,017	41,974,539	318.4%	306.6%	13,325,753	42,432,490	40,851,477	318.4%	306.6%	7.50%	0.9732
	2014	13,051	16,584,185	50,237,740	55,154,576	302.9%	332.6%	15,150,730	45,895,438	50,387,286	302.9%	332.6%	7.50%	0.9136
	2015	11,762	14,759,253	54,470,277	53,734,057	369.1%	364.1%	12,542,824	46,290,358	45,664,698	369.1%	364.1%	7.50%	0.8498
	2016	10,527	13,040,884	57,950,925	51,992,724	444.4%	398.7%	10,309,308	45,812,381	41,102,200	444.4%	398.7%	7.50%	0.7905
	2017	9,356	11,439,781	59,162,693	50,058,092	517.2%	437.6%	8,412,629	43,507,282	36,811,907	517.2%	437.6%	7.50%	0.7354
	2018	8,257	9,964,014	58,414,409	47,693,497	586.3%	478.7%	6,816,162	39,960,006	32,626,067	586.3%	478.7%	7.50%	0.6841
	2019	7,231	8,614,732	57,125,955	44,945,532	663.1%	521.7%	5,481,998	36,352,189	28,601,158	663.1%	521.7%	7.50%	0.6364
	2020	6,280	7,388,384	55,337,391	41,860,742	749.0%	566.6%	4,373,590	32,757,241	24,779,672	749.0%	566.6%	7.50%	0.5920
	2021	5,408	6,284,625	52,963,625	38,490,461	842.7%	612.5%	3,460,665	29,164,724	21,194,993	842.7%	612.5%	7.50%	0.5507
	2022	4,616	5,300,335	50,000,963	34,946,842	943.4%	659.3%	2,715,032	25,612,388	17,901,097	943.4%	659.3%	7.50%	0.5122
	2023	3,906	4,432,233	46,585,559	31,336,583	1051.1%	707.0%	2,111,961	22,198,036	14,931,893	1051.1%	707.0%	7.50%	0.4765
	2024	3,275	3,674,051	42,819,885	27,704,183	1165.5%	754.1%	1,628,546	18,980,178	12,280,050	1165.5%	754.1%	7.50%	0.4433
	2025	2,719	3,018,345	38,816,254	24,191,165	1286.0%	801.5%	1,244,558	16,005,157	9,974,775	1286.0%	801.5%	7.50%	0.4123
	2026	2,236	2,456,701	34,803,182	20,863,831	1416.7%	849.3%	942,302	13,349,248	8,002,615	1416.7%	849.3%	7.50%	0.3836
	2027	1,819	1,979,794	31,055,019	17,768,193	1568.6%	897.5%	706,398	11,080,547	6,339,758	1568.6%	897.5%	7.50%	0.3568
	2028	1,464	1,579,736	27,405,850	14,940,896	1734.8%	945.8%	524,331	9,096,288	4,959,039	1734.8%	945.8%	7.50%	0.3319
	2029	1,167	1,248,081	23,916,748	12,401,713	1916.3%	993.7%	385,350	7,384,389	3,829,077	1916.3%	993.7%	7.50%	0.3088
	2030	919	975,989	20,639,011	10,155,325	2114.7%	1040.5%	280,317	5,927,791	2,916,741	2114.7%	1040.5%	7.50%	0.2872
	2031	716	755,097	17,609,542	8,195,896	2332.1%	1085.4%	201,743	4,704,826	2,189,737	2332.1%	1085.4%	7.50%	0.2672
	2032	551	577,714	14,851,149	6,509,114	2570.7%	1126.7%	143,582	3,691,026	1,617,741	2570.7%	1126.7%	7.50%	0.2485
	2033	419	436,875	12,374,966	5,082,372	2832.6%	1163.3%	101,003	2,861,031	1,175,019	2832.6%	1163.3%	7.50%	0.2312
	2034	314	326,361	10,183,807	3,899,540	3120.4%	1194.9%	70,189	2,190,183	838,655	3120.4%	1194.9%	7.50%	0.2151
	2035	232	240,704	8,274,423	2,940,554	3437.6%	1221.6%	48,155	1,655,386	588,289	3437.6%	1221.6%	7.50%	0.2001
	2036	169	175,159	6,636,015	2,178,904	3788.6%	1244.0%	32,598	1,234,982	405,500	3788.6%	1244.0%	7.50%	0.1861
	2037	122	125,672	5,252,532	1,589,763	4179.6%	1265.0%	21,756	909,313	275,218	4179.6%	1265.0%	7.50%	0.1731
	2038	86	88,829	4,103,344	1,141,973	4619.4%	1285.6%	14,305	660,806	183,904	4619.4%	1285.6%	7.50%	0.1610
	2039	60	61,797	3,163,733	806,890	5119.6%	1305.7%	9,257	473,945	120,877	5119.6%	1305.7%	7.50%	0.1498
	2040	41	42,265	2,407,108	560,161	5695.3%	1325.4%	5,890	335,440	78,061	5695.3%	1325.4%	7.50%	0.1394
	2041	27	28,377	1,806,844	381,525	6367.3%	1344.5%	3,679	234,224	49,458	6367.3%	1344.5%	7.50%	0.1296
	2042	18	18,670	1,337,628	254,480	7164.5%	1363.0%	2,251	161,301	30,687	7164.5%	1363.0%	7.50%	0.1206
	2043	11	12,010	976,290	165,848	8129.0%	1380.9%	1,347	109,515	18,604	8129.0%	1380.9%	7.50%	0.1122
	2044	7	7,532	702,227	105,309	9322.7%	1398.1%	786	73,276	10,989	9322.7%	1398.1%	7.50%	0.1043
	2045	4	4,590	497,562	64,925	10839.2%	1414.4%	446	48,297	6,302	10839.2%	1414.4%	7.50%	0.0971
	2046	2	2,707	347,117	38,698	12823.6%	1429.6%	244	31,343	3,494	12823.6%	1429.6%	7.50%	0.0903
	2047	1	1,537	238,296	22,184	15508.3%	1443.7%	129	20,016	1,863	15508.3%	1443.7%	7.50%	0.0840
	2048	1	834	160,869	12,151	19281.5%	1456.4%	65	12,570	949	19281.5%	1456.4%	7.50%	0.0781
	2049	0	430	106,703	6,309	24821.9%	1467.6%	31	7,756	459	24821.9%	1467.6%	7.50%	0.0727
	2050	0	208	69,467	3,073	33388.3%	1477.1%	14	4,697	208	33388.3%	1477.1%	7.50%	0.0676
	2051	0	93	44,339	1,387	47480.6%	1484.7%	6	2,789	87	47480.6%	1484.7%	7.50%	0.0629
	2052	0	38	27,711	570	72511.6%	1490.4%	2	1,621	33	72511.6%	1490.4%	7.50%	0.0585
	Past		628,824,867	634,523,026	689,712,948	100.9%	109.7%	1,733,238,220	1,097,622,897	1,281,927,053	63.3%	74.0%		
	Future		129,340,717	896,476,174	654,174,577	693.1%	505.8%	91,069,932	511,230,475	410,750,639	561.4%	451.0%		
	Lifetime		758,165,584	1,530,999,201	1,343,887,525	201.9%	177.3%	1,824,308,152	1,608,853,373	1,692,677,693	88.2%	92.8%		

EXHIBIT IX
RiverSource Life Insurance Company
Nationwide Experience Projections with 20% Increase
Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis
Policy Form: 30240

			Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest						
	Calendar Year	Ending Policies Inforce	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
Historical Experience	1989	3,532	477,819	0	0	0.0%	0.0%	2,662,038	0	0	0.0%	0.0%	7.50%	5.5712
	1990	20,231	11,323,037	1,232	1,155	0.0%	0.0%	58,682,081	6,383	5,984	0.0%	0.0%	7.50%	5.1825
	1991	33,057	23,730,033	1,944	3,294,975	0.0%	13.9%	114,401,690	9,371	15,884,962	0.0%	13.9%	7.50%	4.8210
	1992	44,591	34,448,430	1,690,119	6,171,474	4.9%	17.9%	154,488,113	7,579,543	27,676,713	4.9%	17.9%	7.50%	4.4846
	1993	45,706	40,970,649	3,222,626	8,891,377	7.9%	21.7%	170,918,871	13,443,955	37,092,508	7.9%	21.7%	7.50%	4.1717
	1994	43,660	39,420,810	5,892,071	9,855,045	14.9%	25.0%	152,979,856	22,865,288	38,244,354	14.9%	25.0%	7.50%	3.8807
	1995	41,935	37,637,454	7,837,584	11,266,955	20.8%	29.9%	135,869,031	28,293,224	40,673,056	20.8%	29.9%	7.50%	3.6099
	1996	40,338	36,134,012	10,249,636	15,624,614	28.4%	43.2%	121,341,110	34,419,158	52,468,792	28.4%	43.2%	7.50%	3.3581
	1997	38,927	34,589,007	13,065,641	17,780,628	37.8%	51.4%	108,049,164	40,814,459	55,543,137	37.8%	51.4%	7.50%	3.1238
	1998	37,079	33,122,919	15,916,595	19,443,305	48.1%	58.7%	96,250,601	46,251,415	56,499,544	48.1%	58.7%	7.50%	2.9059
	1999	35,367	31,290,387	18,384,152	22,760,137	58.8%	72.7%	84,581,877	49,694,690	61,523,530	58.8%	72.7%	7.50%	2.7031
	2000	33,954	29,843,654	21,429,396	26,669,331	71.8%	89.4%	75,042,952	53,884,995	67,061,002	71.8%	89.4%	7.50%	2.5145
	2001	32,530	28,399,995	25,397,653	26,494,505	89.4%	93.3%	66,430,531	59,407,740	61,973,391	89.4%	93.3%	7.50%	2.3391
	2002	31,025	26,899,593	27,614,437	30,544,425	102.7%	113.5%	58,531,102	60,086,539	66,461,930	102.7%	113.5%	7.50%	2.1759
	2003	29,613	25,356,832	30,295,561	33,084,721	119.5%	130.5%	51,324,830	61,321,325	66,966,870	119.5%	130.5%	7.50%	2.0241
	2004	28,223	23,927,805	34,061,195	38,627,557	142.3%	161.4%	45,053,332	64,133,353	72,731,292	142.3%	161.4%	7.50%	1.8829
	2005	26,280	21,567,058	37,788,114	41,667,455	175.2%	193.2%	37,775,177	66,186,713	72,981,464	175.2%	193.2%	7.50%	1.7515
	2006	24,689	21,676,207	39,456,399	40,389,114	182.0%	186.3%	35,317,538	64,287,211	65,806,904	182.0%	186.3%	7.50%	1.6293
	2007	23,248	23,466,443	42,827,475	46,146,562	182.5%	196.6%	35,566,894	64,911,425	69,941,995	182.5%	196.6%	7.50%	1.5156
	2008	21,729	21,827,751	46,609,785	52,689,538	213.5%	241.4%	30,775,080	65,715,423	74,287,304	213.5%	241.4%	7.50%	1.4099
	2009	20,116	20,383,511	53,209,364	54,558,958	261.0%	267.7%	26,733,802	69,786,241	71,556,288	261.0%	267.7%	7.50%	1.3115
	2010	18,627	20,581,446	59,151,098	53,964,474	287.4%	262.2%	25,110,141	72,166,573	65,838,696	287.4%	262.2%	7.50%	1.2200
	2011	17,139	18,860,305	61,386,135	56,695,958	325.5%	300.6%	21,404,916	69,668,282	64,345,312	325.5%	300.6%	7.50%	1.1349
	2012	15,757	18,216,181	62,949,458	55,888,139	345.6%	306.8%	19,231,523	66,458,165	59,003,259	345.6%	306.8%	7.50%	1.0557
	1/2013-3/2013	15,465	4,673,528	16,085,355	17,202,549	344.2%	368.1%	4,715,969	16,231,428	17,358,767	344.2%	368.1%	7.50%	1.0091
Projected Future Experience	4/2013-12/2013	14,357	13,692,096	43,598,983	41,966,966	318.4%	306.5%	13,325,753	42,432,457	40,844,106	318.4%	306.5%	7.50%	0.9732
	2014	12,788	18,114,374	50,204,777	54,945,862	277.2%	303.3%	16,548,656	45,865,324	50,196,612	277.2%	303.3%	7.50%	0.9136
	2015	11,525	17,216,241	54,378,689	53,492,030	315.9%	310.7%	14,630,841	46,212,524	45,459,016	315.9%	310.7%	7.50%	0.8498
	2016	10,315	15,211,828	57,783,065	51,507,662	379.9%	338.6%	12,025,521	45,679,681	40,718,740	379.9%	338.6%	7.50%	0.7905
	2017	9,168	13,344,203	58,832,806	49,147,575	440.9%	368.3%	9,813,110	43,264,689	36,142,328	440.9%	368.3%	7.50%	0.7354
	2018	8,091	11,622,779	57,858,222	46,621,258	497.8%	401.1%	7,950,886	39,579,531	31,892,572	497.8%	401.1%	7.50%	0.6841
	2019	7,085	10,048,895	56,385,677	43,924,386	561.1%	437.1%	6,394,630	35,881,112	27,951,351	561.1%	437.1%	7.50%	0.6364
	2020	6,153	8,618,406	54,477,093	40,900,074	632.1%	474.6%	5,101,708	32,247,983	24,211,000	632.1%	474.6%	7.50%	0.5920
	2021	5,299	7,330,909	52,039,664	37,598,702	709.9%	512.9%	4,036,807	28,655,940	20,703,941	709.9%	512.9%	7.50%	0.5507
	2022	4,523	6,182,763	49,057,934	34,129,826	793.5%	552.0%	3,167,046	25,129,333	17,482,590	793.5%	552.0%	7.50%	0.5122
	2023	3,827	5,170,146	45,652,759	30,597,671	883.0%	591.8%	2,463,576	21,753,557	14,579,801	883.0%	591.8%	7.50%	0.4765
	2024	3,209	4,285,744	41,918,856	27,045,710	978.1%	631.1%	1,899,682	18,580,791	11,988,178	978.1%	631.1%	7.50%	0.4433
	2025	2,665	3,520,876	37,964,075	23,611,878	1078.3%	670.6%	1,451,767	15,653,777	9,735,916	1078.3%	670.6%	7.50%	0.4123
	2026	2,191	2,865,728	34,012,584	20,360,721	1186.9%	710.5%	1,099,190	13,046,003	7,809,640	1186.9%	710.5%	7.50%	0.3836
	2027	1,782	2,309,423	30,334,597	17,336,953	1313.5%	750.7%	824,011	10,823,497	6,185,889	1313.5%	750.7%	7.50%	0.3568
	2028	1,435	1,842,759	26,760,343	14,576,115	1452.2%	791.0%	611,631	8,882,037	4,837,965	1452.2%	791.0%	7.50%	0.3319
	2029	1,143	1,455,886	23,347,601	12,097,280	1603.7%	830.9%	449,510	7,208,663	3,735,083	1603.7%	830.9%	7.50%	0.3088
	2030	901	1,138,491	20,144,434	9,904,806	1769.4%	870.0%	326,989	5,785,742	2,844,788	1769.4%	870.0%	7.50%	0.2872
	2031	702	880,822	17,185,159	7,992,814	1951.0%	907.4%	235,333	4,591,442	2,135,479	1951.0%	907.4%	7.50%	0.2672
	2032	540	673,905	14,491,369	6,347,186	2150.4%	941.9%	167,489	3,601,608	1,577,496	2150.4%	941.9%	7.50%	0.2485
	2033	410	509,616	12,073,720	4,955,488	2369.2%	972.4%	117,821	2,791,385	1,145,684	2369.2%	972.4%	7.50%	0.2312
	2034	308	380,702	9,934,783	3,801,875	2609.6%	998.6%	81,876	2,136,626	817,651	2609.6%	998.6%	7.50%	0.2151
	2035	228	280,782	8,071,248	2,866,695	2874.6%	1021.0%	56,174	1,614,739	573,513	2874.6%	1021.0%	7.50%	0.2001
	2036	166	204,324	6,472,446	2,124,032	3167.7%	1039.5%	38,025	1,204,541	395,289	3167.7%	1039.5%	7.50%	0.1861
	2037	119	146,597	5,122,613	1,549,631	3494.4%	1057.1%	25,379	886,822	268,271	3494.4%	1057.1%	7.50%	0.1731
	2038	84	103,619	4,001,529	1,113,081	3861.8%	1074.2%	16,687	644,410	179,252	3861.8%	1074.2%	7.50%	0.1610
	2039	58	72,086	3,085,005	786,434	4279.6%	1091.0%	10,799	462,151	117,812	4279.6%	1091.0%	7.50%	0.1498
	2040	40	49,302	2,347,048	545,933	4760.6%	1107.3%	6,870	327,071	76,078	4760.6%	1107.3%	7.50%	0.1394
	2041	27	33,102	1,761,652	371,819	5321.9%	1123.3%	4,291	228,366	48,199	5321.9%	1123.3%	7.50%	0.1296
	2042	17	21,779	1,304,096	247,996	5987.9%	1138.7%	2,626	157,258	29,905	5987.9%	1138.7%	7.50%	0.1206
	2043	11	14,010	951,765	161,617	6793.6%	1153.6%	1,572	106,764	18,129	6793.6%	1153.6%	7.50%	0.1122
	2044	7	8,787	684,554	102,620	7790.9%	1167.9%	917	71,432	10,708	7790.9%	1167.9%	7.50%	0.1043
	2045	4	5,355	485,018	63,265	9057.8%	1181.5%	520	47,080	6,141	9057.8%	1181.5%	7.50%	0.0971
	2046	2	3,158	338,352	37,709	10715.6%	1194.2%	285	30,552	3,405	10715.6%	1194.2%	7.50%	0.0903
	2047	1	1,792	232,271	21,616	12958.6%	1206.0%	151	19,510	1,816	12958.6%	1206.0%	7.50%	0.0840
	2048	1	973	156,796	11,840	16110.9%	1216.6%	76	12,251	925	16110.9%	1216.6%	7.50%	0.0781
	2049	0	501	103,998	6,147	20739.6%	1225.9%	36	7,559	447	20739.6%	1225.9%	7.50%	0.0727
	2050	0	243	67,704	2,994	27896.3%	1233.8%	16	4,578	202	27896.3%	1233.8%	7.50%	0.0676
	2051	0	109	43,213	1,351	39669.6%	1240.2%	7	2,718	85	39669.6%	1240.2%	7.50%	0.0629
	2052	0	45	27,007	555	60581.5%	1244.9%	3	1,580	32	60581.5%	1244.9%	7.50%	0.0585
	Past		628,824,867	634,523,026	689,712,948	100.9%	109.7%	1,733,238,220	1,097,622,897	1,281,927,053	63.3%	74.0%		
	Future		147,363,153	883,693,507	642,878,173	599.7%	436.3%	102,888,267	505,633,083	404,726,037	491.4%	393.4%		
	Lifetime		776,188,020	1,518,216,533	1,332,591,122	195.6%	171.7%	1,836,126,487	1,603,255,980	1,686,653,090	87.3%	91.9%		

EXHIBIT X
RiverSource Life Insurance Company
Virginia Experience Projections with No Increase
Policy Forms: 30240-VA and 30240-VA1

			Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest						
	Calendar Year	Ending Policies Inforce	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
	1989	97	12,930	0	0	0.0%	0.0%	72,034	0	0	0.0%	0.0%	7.50%	5.5712
	1990	506	281,227	0	0	0.0%	0.0%	1,457,472	0	0	0.0%	0.0%	7.50%	5.1825
	1991	806	545,656	0	0	0.0%	0.0%	2,630,589	0	0	0.0%	0.0%	7.50%	4.8210
	1992	1,107	805,015	0	49,943	0.0%	6.2%	3,610,187	0	223,974	0.0%	6.2%	7.50%	4.4846
	1993	1,134	977,851	32,163	23,317	3.3%	2.4%	4,079,339	134,175	97,272	3.3%	2.4%	7.50%	4.1717
	1994	1,081	928,315	90,262	386,822	9.7%	41.7%	3,602,501	350,279	1,501,136	9.7%	41.7%	7.50%	3.8807
	1995	1,053	897,829	165,157	518,937	18.4%	57.8%	3,241,110	596,207	1,873,331	18.4%	57.8%	7.50%	3.6099
	1996	1,021	873,314	279,475	2,242	32.0%	0.3%	2,932,662	938,500	7,528	32.0%	0.3%	7.50%	3.3581
	1997	991	840,512	263,453	578,394	31.3%	68.8%	2,625,591	822,976	1,806,789	31.3%	68.8%	7.50%	3.1238
Historical	1998	930	801,303	331,945	276,031	41.4%	34.4%	2,328,476	964,586	802,109	41.4%	34.4%	7.50%	2.9059
Experience	1999	895	756,673	393,906	859,750	52.1%	113.6%	2,045,384	1,064,777	2,324,013	52.1%	113.6%	7.50%	2.7031
	2000	863	727,942	637,070	1,540,439	87.5%	211.6%	1,830,436	1,601,937	3,873,490	87.5%	211.6%	7.50%	2.5145
	2001	832	693,976	901,170	984,009	129.9%	141.8%	1,623,282	2,107,929	2,301,699	129.9%	141.8%	7.50%	2.3391
	2002	799	660,626	842,176	419,803	127.5%	63.5%	1,437,462	1,832,499	913,453	127.5%	63.5%	7.50%	2.1759
	2003	765	623,380	775,958	684,644	124.5%	109.8%	1,261,786	1,570,618	1,385,791	124.5%	109.8%	7.50%	2.0241
	2004	735	596,869	850,337	1,013,967	142.5%	169.9%	1,123,836	1,601,087	1,909,184	142.5%	169.9%	7.50%	1.8829
	2005	698	563,947	954,720	1,227,484	169.3%	217.7%	987,766	1,672,213	2,149,964	169.3%	217.7%	7.50%	1.7515
	2006	659	570,833	1,148,821	1,555,807	201.3%	272.6%	930,071	1,871,801	2,534,911	201.3%	272.6%	7.50%	1.6293
	2007	628	617,806	1,195,069	463,582	193.4%	75.0%	936,377	1,811,305	702,628	193.4%	75.0%	7.50%	1.5156
	2008	598	584,110	1,530,315	1,759,989	262.0%	301.3%	823,540	2,157,600	2,481,419	262.0%	301.3%	7.50%	1.4099
	2009	560	551,466	1,498,676	1,775,332	271.8%	321.9%	723,270	1,965,574	2,328,420	271.8%	321.9%	7.50%	1.3115
	2010	520	570,640	1,513,334	724,224	265.2%	126.9%	696,202	1,846,325	883,581	265.2%	126.9%	7.50%	1.2200
	2011	479	528,609	1,642,156	1,901,608	310.7%	359.7%	599,929	1,863,714	2,158,170	310.7%	359.7%	7.50%	1.1349
	2012	445	511,741	1,824,094	1,071,745	356.4%	209.4%	540,264	1,925,766	1,131,483	356.4%	209.4%	7.50%	1.0557
	1/2013-3/2013	439	133,135	391,443	518,971	294.0%	389.8%	134,344	394,998	523,684	294.0%	389.8%	7.50%	1.0091
	4/2013-12/2013	411	389,231	1,229,086	1,246,005	315.8%	320.1%	378,817	1,196,200	1,212,667	315.8%	320.1%	7.50%	0.9732
	2014	375	473,987	1,375,114	1,648,382	290.1%	347.8%	433,018	1,256,256	1,505,904	290.1%	347.8%	7.50%	0.9136
	2015	339	424,414	1,523,188	1,613,414	358.9%	380.2%	360,679	1,294,448	1,371,125	358.9%	380.2%	7.50%	0.8498
	2016	304	377,302	1,641,417	1,566,639	435.0%	415.2%	298,271	1,297,602	1,238,487	435.0%	415.2%	7.50%	0.7905
	2017	271	332,948	1,703,168	1,516,497	511.5%	455.5%	244,845	1,252,482	1,115,207	511.5%	455.5%	7.50%	0.7354
	2018	240	291,726	1,709,407	1,451,107	586.0%	497.4%	199,564	1,169,368	992,670	586.0%	497.4%	7.50%	0.6841
Projected	2019	211	253,696	1,698,254	1,375,736	669.4%	542.3%	161,440	1,080,686	875,452	669.4%	542.3%	7.50%	0.6364
Future	2020	184	218,828	1,670,158	1,287,188	763.2%	588.2%	129,536	988,658	761,957	763.2%	588.2%	7.50%	0.5920
Experience	2021	159	187,209	1,613,038	1,186,167	861.6%	633.6%	103,088	888,229	653,169	861.6%	633.6%	7.50%	0.5507
	2022	136	158,793	1,536,378	1,079,077	967.5%	679.5%	81,340	786,991	552,744	967.5%	679.5%	7.50%	0.5122
	2023	115	133,553	1,445,153	967,142	1082.1%	724.2%	63,638	688,616	460,843	1082.1%	724.2%	7.50%	0.4765
	2024	97	111,346	1,336,143	855,767	1200.0%	768.6%	49,355	592,254	379,324	1200.0%	768.6%	7.50%	0.4433
	2025	80	92,003	1,216,822	750,223	1322.6%	815.4%	37,936	501,734	309,340	1322.6%	815.4%	7.50%	0.4123
	2026	66	75,325	1,097,238	651,647	1456.7%	865.1%	28,892	420,861	249,948	1456.7%	865.1%	7.50%	0.3836
	2027	54	61,057	983,380	560,085	1610.6%	917.3%	21,786	350,874	199,841	1610.6%	917.3%	7.50%	0.3568
	2028	43	48,997	872,528	476,034	1780.8%	971.6%	16,262	289,601	158,001	1780.8%	971.6%	7.50%	0.3319
	2029	35	38,927	766,345	399,789	1968.7%	1027.0%	12,019	236,612	123,436	1968.7%	1027.0%	7.50%	0.3088
	2030	27	30,605	666,082	330,314	2176.4%	1079.3%	8,790	191,307	94,870	2176.4%	1079.3%	7.50%	0.2872
	2031	21	23,800	572,546	268,623	2405.6%	1128.6%	6,359	152,970	71,769	2405.6%	1128.6%	7.50%	0.2672
	2032	16	18,297	486,482	214,435	2658.8%	1172.0%	4,547	120,908	53,294	2658.8%	1172.0%	7.50%	0.2485
	2033	12	13,897	408,295	167,927	2938.0%	1208.4%	3,213	94,396	38,824	2938.0%	1208.4%	7.50%	0.2312
	2034	9	10,422	338,281	129,101	3245.8%	1238.7%	2,241	72,752	27,765	3245.8%	1238.7%	7.50%	0.2151
	2035	7	7,713	276,578	97,377	3585.8%	1262.5%	1,543	55,332	19,481	3585.8%	1262.5%	7.50%	0.2001
	2036	5	5,629	223,082	72,318	3963.1%	1284.7%	1,048	41,516	13,459	3963.1%	1284.7%	7.50%	0.1861
	2037	4	4,048	177,505	52,899	4385.1%	1306.8%	701	30,729	9,158	4385.1%	1306.8%	7.50%	0.1731
	2038	2	2,866	139,326	38,081	4861.7%	1328.8%	462	22,437	6,133	4861.7%	1328.8%	7.50%	0.1610
	2039	2	1,995	107,872	26,949	5406.5%	1350.7%	299	16,160	4,037	5406.5%	1350.7%	7.50%	0.1498
	2040	1	1,364	82,367	18,721	6038.3%	1372.5%	190	11,478	2,609	6038.3%	1372.5%	7.50%	0.1394
	2041	1	914	62,005	12,742	6784.1%	1394.2%	118	8,038	1,652	6784.1%	1394.2%	7.50%	0.1296
	2042	0	599	46,002	8,476	7684.2%	1415.8%	72	5,547	1,022	7684.2%	1415.8%	7.50%	0.1206
	2043	0	382	33,625	5,493	8799.3%	1437.5%	43	3,772	616	8799.3%	1437.5%	7.50%	0.1122
	2044	0	237	24,205	3,455	10222.8%	1459.3%	25	2,526	361	10222.8%	1459.3%	7.50%	0.1043
	2045	0	142	17,152	2,100	12100.1%	1481.3%	14	1,665	204	12100.1%	1481.3%	7.50%	0.0971
	2046	0	82	11,958	1,226	14663.9%	1503.7%	7	1,080	111	14663.9%	1503.7%	7.50%	0.0903
	2047	0	45	8,197	684	18300.2%	1526.5%	4	689	57	18300.2%	1526.5%	7.50%	0.0840
	2048	0	23	5,519	361	23681.6%	1549.9%	2	431	28	23681.6%	1549.9%	7.50%	0.0781
	2049	0	11	3,647	179	32050.0%	1573.7%	1	265	13	32050.0%	1573.7%	7.50%	0.0727
	2050	0	5	2,362	82	45868.2%	1597.8%	0	160	6	45868.2%	1597.8%	7.50%	0.0676
	2051	0	2	1,497	34	70467.6%	1622.4%	0	94	2	70467.6%	1622.4%	7.50%	0.0629
	2052	0	1	928	13	118716.9%	1647.7%	0	54	1	118716.9%	1647.7%	7.50%	0.0585
	Past		15,655,704	17,261,700	18,337,039	110.3%	117.1%	42,273,911	29,094,867	33,914,028	68.8%	80.2%		
	Future		3,792,422	27,112,330	20,082,489	714.9%	529.5%	2,650,163	15,125,778	12,505,587	570.7%	471.9%		
	Lifetime		19,448,126	44,374,030	38,419,527	228.2%	197.5%	44,924,074	44,220,646	46,419,615	98.4%	103.3%		

EXHIBIT X
RiverSource Life Insurance Company
Virginia Experience Projections with 20% Increase
Policy Forms: 30240-VA and 30240-VA1

			Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest						
	Calendar Year	Ending Policies Inforce	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
	1989	97	12,930	0	0	0.0%	0.0%	72,034	0	0	0.0%	0.0%	7.50%	5.5712
	1990	506	281,227	0	0	0.0%	0.0%	1,457,472	0	0	0.0%	0.0%	7.50%	5.1825
	1991	806	545,656	0	0	0.0%	0.0%	2,630,589	0	0	0.0%	0.0%	7.50%	4.8210
	1992	1,107	805,015	0	49,943	0.0%	6.2%	3,610,187	0	223,974	0.0%	6.2%	7.50%	4.4846
	1993	1,134	977,851	32,163	23,317	3.3%	2.4%	4,079,339	134,175	97,272	3.3%	2.4%	7.50%	4.1717
	1994	1,081	928,315	90,262	386,822	9.7%	41.7%	3,602,501	350,279	1,501,136	9.7%	41.7%	7.50%	3.8807
	1995	1,053	897,829	165,157	518,937	18.4%	57.8%	3,241,110	596,207	1,873,331	18.4%	57.8%	7.50%	3.6099
	1996	1,021	873,314	279,475	2,242	32.0%	0.3%	2,932,662	938,500	7,528	32.0%	0.3%	7.50%	3.3581
	1997	991	840,512	263,453	578,394	31.3%	68.8%	2,625,591	822,976	1,806,789	31.3%	68.8%	7.50%	3.1238
Historical	1998	930	801,303	331,945	276,031	41.4%	34.4%	2,328,476	964,586	802,109	41.4%	34.4%	7.50%	2.9059
Experience	1999	895	756,673	393,906	859,750	52.1%	113.6%	2,045,384	1,064,777	2,324,013	52.1%	113.6%	7.50%	2.7031
	2000	863	727,942	637,070	1,540,439	87.5%	211.6%	1,830,436	1,601,937	3,873,490	87.5%	211.6%	7.50%	2.5145
	2001	832	693,976	901,170	984,009	129.9%	141.8%	1,623,282	2,107,929	2,301,699	129.9%	141.8%	7.50%	2.3391
	2002	799	660,626	842,176	419,803	127.5%	63.5%	1,437,462	1,832,499	913,453	127.5%	63.5%	7.50%	2.1759
	2003	765	623,380	775,958	684,644	124.5%	109.8%	1,261,786	1,570,618	1,385,791	124.5%	109.8%	7.50%	2.0241
	2004	735	596,869	850,337	1,013,967	142.5%	169.9%	1,123,836	1,601,087	1,909,184	142.5%	169.9%	7.50%	1.8829
	2005	698	563,947	954,720	1,227,484	169.3%	217.7%	987,766	1,672,213	2,149,964	169.3%	217.7%	7.50%	1.7515
	2006	659	570,833	1,148,821	1,555,807	201.3%	272.6%	930,071	1,871,801	2,534,911	201.3%	272.6%	7.50%	1.6293
	2007	628	617,806	1,195,069	463,582	193.4%	75.0%	936,377	1,811,305	702,628	193.4%	75.0%	7.50%	1.5156
	2008	598	584,110	1,530,315	1,759,989	262.0%	301.3%	823,540	2,157,600	2,481,419	262.0%	301.3%	7.50%	1.4099
	2009	560	551,466	1,498,676	1,775,332	271.8%	321.9%	723,270	1,965,574	2,328,420	271.8%	321.9%	7.50%	1.3115
	2010	520	570,640	1,513,334	724,224	265.2%	126.9%	696,202	1,846,325	883,581	265.2%	126.9%	7.50%	1.2200
	2011	479	528,609	1,642,156	1,901,608	310.7%	359.7%	599,929	1,863,714	2,158,170	310.7%	359.7%	7.50%	1.1349
	2012	445	511,741	1,824,094	1,071,745	356.4%	209.4%	540,264	1,925,766	1,131,483	356.4%	209.4%	7.50%	1.0557
	1/2013-3/2013	439	133,135	391,443	518,971	294.0%	389.8%	134,344	394,998	523,684	294.0%	389.8%	7.50%	1.0091
	4/2013-12/2013	411	389,231	1,229,085	1,245,727	315.8%	320.0%	378,817	1,196,199	1,212,397	315.8%	320.0%	7.50%	0.9732
	2014	367	517,025	1,374,257	1,642,331	265.8%	317.7%	472,336	1,255,473	1,500,376	265.8%	317.7%	7.50%	0.9136
	2015	332	495,097	1,520,695	1,606,389	307.2%	324.5%	420,747	1,292,329	1,365,154	307.2%	324.5%	7.50%	0.8498
	2016	298	440,138	1,636,784	1,552,395	371.9%	352.7%	347,945	1,293,939	1,227,227	371.9%	352.7%	7.50%	0.7905
	2017	266	388,397	1,693,912	1,489,204	436.1%	383.4%	285,621	1,245,675	1,095,136	436.1%	383.4%	7.50%	0.7354
	2018	236	340,309	1,693,477	1,418,643	497.6%	416.9%	232,798	1,158,470	970,462	497.6%	416.9%	7.50%	0.6841
Projected	2019	207	295,946	1,676,672	1,344,625	566.5%	454.3%	188,326	1,066,953	855,654	566.5%	454.3%	7.50%	0.6364
Future	2020	180	255,270	1,644,686	1,257,783	644.3%	492.7%	151,108	973,580	744,551	644.3%	492.7%	7.50%	0.5920
Experience	2021	155	218,385	1,585,279	1,158,811	725.9%	530.6%	120,255	872,943	638,106	725.9%	530.6%	7.50%	0.5507
	2022	133	185,237	1,507,675	1,053,963	813.9%	569.0%	94,886	772,288	539,880	813.9%	569.0%	7.50%	0.5122
	2023	113	155,794	1,416,480	944,439	909.2%	606.2%	74,236	674,953	450,025	909.2%	606.2%	7.50%	0.4765
	2024	95	129,889	1,308,246	835,513	1007.2%	643.3%	57,574	579,888	370,346	1007.2%	643.3%	7.50%	0.4433
	2025	79	107,325	1,190,281	732,325	1109.0%	682.3%	44,253	490,790	301,961	1109.0%	682.3%	7.50%	0.4123
	2026	65	87,869	1,072,476	635,982	1220.5%	723.8%	33,703	411,363	243,940	1220.5%	723.8%	7.50%	0.3836
	2027	53	71,225	960,681	546,525	1348.8%	767.3%	25,414	342,774	195,002	1348.8%	767.3%	7.50%	0.3568
	2028	43	57,156	852,055	464,432	1490.8%	812.6%	18,971	282,806	154,150	1490.8%	812.6%	7.50%	0.3319
	2029	34	45,409	748,161	389,986	1647.6%	858.8%	14,020	230,998	120,410	1647.6%	858.8%	7.50%	0.3088
	2030	27	35,702	650,156	322,170	1821.1%	902.4%	10,254	186,733	92,531	1821.1%	902.4%	7.50%	0.2872
	2031	21	27,764	558,770	261,968	2012.6%	943.6%	7,418	149,289	69,991	2012.6%	943.6%	7.50%	0.2672
	2032	16	21,344	474,709	209,099	2224.1%	979.7%	5,305	117,982	51,968	2224.1%	979.7%	7.50%	0.2485
	2033	12	16,211	398,362	163,732	2457.3%	1010.0%	3,748	92,099	37,854	2457.3%	1010.0%	7.50%	0.2312
	2034	9	12,158	330,010	125,865	2714.4%	1035.3%	2,615	70,974	27,069	2714.4%	1035.3%	7.50%	0.2151
	2035	7	8,997	269,785	94,929	2998.4%	1055.1%	1,800	53,973	18,992	2998.4%	1055.1%	7.50%	0.2001
	2036	5	6,566	217,580	70,495	3313.6%	1073.6%	1,222	40,492	13,119	3313.6%	1073.6%	7.50%	0.1861
	2037	3	4,722	173,110	51,562	3666.1%	1092.0%	817	29,969	8,926	3666.1%	1092.0%	7.50%	0.1731
	2038	2	3,343	135,865	37,116	4064.1%	1110.2%	538	21,880	5,977	4064.1%	1110.2%	7.50%	0.1610
	2039	2	2,327	105,184	26,265	4519.2%	1128.5%	349	15,757	3,935	4519.2%	1128.5%	7.50%	0.1498
	2040	1	1,591	80,308	18,245	5047.0%	1146.6%	222	11,191	2,543	5047.0%	1146.6%	7.50%	0.1394
	2041	1	1,066	60,451	12,417	5670.0%	1164.7%	138	7,836	1,610	5670.0%	1164.7%	7.50%	0.1296
	2042	0	698	44,846	8,260	6421.8%	1182.7%	84	5,408	996	6421.8%	1182.7%	7.50%	0.1206
	2043	0	446	32,778	5,353	7353.4%	1200.8%	50	3,677	600	7353.4%	1200.8%	7.50%	0.1122
	2044	0	276	23,594	3,367	8542.5%	1218.9%	29	2,462	351	8542.5%	1218.9%	7.50%	0.1043
	2045	0	165	16,719	2,046	10110.8%	1237.3%	16	1,623	199	10110.8%	1237.3%	7.50%	0.0971
	2046	0	95	11,655	1,195	12252.5%	1255.9%	9	1,052	108	12252.5%	1255.9%	7.50%	0.0903
	2047	0	52	7,989	666	15290.3%	1275.0%	4	671	56	15290.3%	1275.0%	7.50%	0.0840
	2048	0	27	5,379	352	19785.8%	1294.5%	2	420	27	19785.8%	1294.5%	7.50%	0.0781
	2049	0	13	3,554	174	26776.7%	1314.3%	1	258	13	26776.7%	1314.3%	7.50%	0.0727
	2050	0	6	2,302	80	38320.2%	1334.4%	0	156	5	38320.2%	1334.4%	7.50%	0.0676
	2051	0	2	1,459	34	58869.9%	1354.9%	0	92	2	58869.9%	1354.9%	7.50%	0.0629
	2052	0	1	904	13	99175.9%	1376.0%	0	53	1	99175.9%	1376.0%	7.50%	0.0585
	Past		15,655,704	17,261,700	18,337,039	110.3%	117.1%	42,273,911	29,094,867	33,914,028	68.8%	80.2%		
	Future		4,323,278	26,716,370	19,734,475	618.0%	456.5%	2,995,631	14,955,470	12,321,651	499.2%	411.3%		
	Lifetime		19,978,982	43,978,070	38,071,513	220.1%	190.6%	45,269,542	44,050,338	46,235,679	97.3%	102.1%		

EXHIBIT XI
RiverSource Life Insurance Company
Incurred Loss Ratio Including the Change in Active Life Reserves
Nationwide Experience, without Interest
Policy Form: 30240

Calendar Year	(a) Earned Premiums [1]	(b) Incurred Claims	(c) Change in Active Life Reserves	(d) = (b+c)/(a) Loss Ratio
1989	477,819	0	1,391,207	291.2%
1990	11,323,037	1,155	3,284,193	29.0%
1991	23,730,033	3,294,975	3,237,764	27.5%
1992	34,448,430	6,171,474	19,429,171	74.3%
1993	40,970,649	8,891,377	32,326,913	100.6%
1994	39,420,810	9,855,045	37,913,000	121.2%
1995	37,637,454	11,266,955	36,886,685	127.9%
1996	36,134,012	15,624,614	35,463,628	141.4%
1997	34,589,007	17,780,628	34,003,890	149.7%
1998	33,122,919	19,443,305	32,223,628	156.0%
1999	31,290,387	22,760,137	30,066,684	168.8%
2000	29,843,654	26,669,331	27,595,790	181.8%
2001	28,399,995	26,494,505	24,806,314	180.6%
2002	26,899,593	30,544,425	21,687,898	194.2%
2003	25,356,832	33,084,721	18,308,593	202.7%
2004	23,927,805	38,627,557	14,827,967	223.4%
2005	21,567,058	41,667,455	(9,867,495)	147.4%
2006	21,676,207	40,389,114	4,066,404	205.1%
2007	23,466,443	46,146,562	2,038,046	205.3%
2008	21,827,751	52,689,538	(784,233)	237.8%
2009	20,383,511	54,558,958	(6,179,502)	237.3%
2010	20,581,446	53,964,474	(7,157,861)	227.4%
2011	18,860,305	56,695,958	2,640,564	314.6%
2012	18,216,181	55,888,139	(13,739,295)	231.4%
1/2013-3/2013	4,673,528	17,202,549	(4,446,262)	272.9%
Total	628,824,867	689,712,948	340,023,692	163.8%

[1] Premiums reflect the accumulated 78.5% rate increases as approved in Virginia and implemented from 2006 through 2013 on a nationwide basis.

EXHIBIT XII
RiverSource Life Insurance Company
Incurred Loss Ratio Including the Change in Active Life Reserves
Virginia Experience, without Interest
Policy Forms: 30240-VA and 30240-VA1

Calendar Year	(a) Earned Premiums	(b) Incurred Claims	(c) Change in Active Life Reserves	(d) = (b+c)/(a) Loss Ratio
1989	12,930	0	28,983	224.2%
1990	281,227	0	54,859	19.5%
1991	545,656	0	52,250	9.6%
1992	805,015	49,943	469,461	64.5%
1993	977,851	23,317	820,570	86.3%
1994	928,315	386,822	974,675	146.7%
1995	897,829	518,937	944,138	163.0%
1996	873,314	2,242	913,449	104.9%
1997	840,512	578,394	883,963	174.0%
1998	801,303	276,031	846,271	140.1%
1999	756,673	859,750	800,396	219.4%
2000	727,942	1,540,439	743,463	313.7%
2001	693,976	984,009	677,493	239.4%
2002	660,626	419,803	602,700	154.8%
2003	623,380	684,644	520,755	193.4%
2004	596,869	1,013,967	434,680	242.7%
2005	563,947	1,227,484	253,411	262.6%
2006	570,833	1,555,807	6,654	273.7%
2007	617,806	463,582	65,253	85.6%
2008	584,110	1,759,989	206,335	336.6%
2009	551,466	1,775,332	(24,383)	317.5%
2010	570,640	724,224	(137,587)	102.8%
2011	528,609	1,901,608	530,319	460.1%
2012	511,741	1,071,745	(286,645)	153.4%
1/2013-3/2013	133,135	518,971	(97,624)	316.5%
Total	15,655,704	18,337,039	10,283,838	182.8%

EXHIBIT XIII
Demonstration of Compliance with Dual-Loss Ratio Standard
For Individual Long-Term Care with Prescribed Factors[1]

Nationwide Experience
Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis
Policy Form: 30240

1a	Accumulated value of past earned premiums	1,733,238,220	x	60.0%	=	1,039,942,932
1b	Present value of future projected earned premiums at current level	91,069,932	x	60.0%	=	54,641,959
2	Present value of increased portion of future projected earned premiums	11,818,335	x	80.0%	=	9,454,668
3	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1a, 1b and 2**	**1,836,126,487**				**1,104,039,559**
4	**Lifetime Incurred Claims with Rate Increase**					**1,686,653,090**
5	**Test: 4 is not less than 3**					**TRUE**

Virginia Experience
Using Actual History
Policy Forms: 30240-VA and 30240-VA1

1a	Accumulated value of past earned premiums	42,273,911	x	60.0%	=	25,364,346
1b	Present value of future projected earned premiums at current level	2,650,163	x	60.0%	=	1,590,098
2	Present value of increased portion of future projected earned premiums	345,468	x	80.0%	=	276,374
3	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1a, 1b and 2**	**45,269,542**				**27,230,819**
4	**Lifetime Incurred Claims with Rate Increase**					**46,235,679**
5	**Test: 4 is not less than 3**					**TRUE**

[1] As prescribed by NAIC Model Bulletin, where 60.0% is the greater of 60.0% and the lifetime loss ratio at the time of original pricing

EXHIBIT XIV

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

LIFETIME BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	72.10	54.44	151.34	114.40	230.76	174.54
51	72.10	54.44	151.34	114.40	230.76	174.54
52	72.10	54.44	151.34	114.40	230.76	174.54
53	72.10	54.44	151.34	114.40	230.76	174.54
54	72.10	54.44	151.34	114.40	230.76	174.54
55	72.10	54.44	151.34	114.40	230.76	174.54
56	78.54	60.84	164.74	127.78	249.50	193.64
57	84.78	65.68	178.12	137.96	272.16	210.76
58	94.42	72.10	198.28	151.34	293.74	224.14
59	104.06	78.54	214.16	161.52	315.00	237.54
60	113.68	89.76	229.14	180.78	338.36	266.96
61	126.54	102.44	241.66	195.94	355.88	279.64
62	137.60	108.88	252.88	200.26	364.24	291.96
63	156.88	126.54	275.00	221.84	385.48	310.88
64	174.54	137.76	295.00	232.90	416.00	328.38
65	192.02	157.04	310.72	253.78	442.06	361.04
66	209.70	168.10	328.00	263.24	454.54	364.80
67	233.80	185.80	355.88	282.88	493.28	392.08
68	257.70	209.88	386.90	315.16	541.64	441.16
69	288.24	229.14	420.64	334.26	586.96	466.52
70	318.58	253.06	451.50	358.72	657.46	522.36
71	348.92	277.18	483.64	384.06	669.42	531.46
72	384.24	305.90	516.30	411.18	698.70	556.46
73	425.82	342.84	558.96	449.92	739.92	595.72
74	469.00	377.98	600.90	484.36	788.80	635.88
75	521.84	414.94	652.12	518.44	860.38	684.04
76	576.26	456.52	701.90	556.10	907.66	719.22
77	630.70	504.52	761.70	609.30	986.72	789.36
78	685.14	546.28	805.76	642.48	999.98	841.82
79	737.96	594.28	852.34	686.36	999.98	918.92

EXHIBIT XIV

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

4 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	55.50	39.98	116.36	84.06	161.34	116.54
51	55.50	39.98	116.36	84.06	161.34	116.54
52	55.50	39.98	116.36	84.06	161.34	116.54
53	55.50	39.98	116.36	84.06	161.34	116.54
54	55.50	39.98	116.36	84.06	161.34	116.54
55	55.50	39.98	116.36	84.06	161.34	116.54
56	60.32	44.80	126.70	94.06	174.54	129.56
57	65.32	48.36	137.06	101.36	190.42	140.80
58	72.64	53.00	152.58	111.38	205.42	149.92
59	80.12	57.64	164.74	118.86	220.22	158.84
60	87.46	66.02	176.32	132.96	236.82	178.48
61	97.28	75.30	185.96	144.02	248.98	187.58
62	105.84	80.12	194.52	147.24	254.84	198.28
63	120.64	93.00	211.66	163.12	269.66	207.92
64	134.20	101.36	226.84	171.34	290.72	219.70
65	147.78	115.46	238.96	186.66	305.54	234.32
66	161.34	123.70	252.36	193.46	319.80	247.34
67	179.70	136.70	273.78	208.10	344.98	262.36
68	198.28	154.36	297.68	231.64	378.90	294.84
69	221.66	168.46	323.56	245.74	410.46	311.76
70	245.02	186.16	347.28	263.76	459.72	349.26
71	268.42	203.82	372.12	282.52	468.30	355.52
72	295.52	225.06	397.26	302.32	488.80	371.92
73	327.48	252.00	429.92	330.88	517.36	398.16
74	360.86	278.04	462.22	356.04	551.64	424.92
75	401.36	304.98	501.68	381.20	601.78	457.24
76	443.30	335.68	540.02	408.88	634.96	480.62
77	485.24	371.02	585.90	447.94	690.12	527.54
78	527.02	401.72	619.80	472.40	738.30	562.72
79	567.70	437.04	655.68	504.70	798.10	614.28

EXHIBIT XIV

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

3 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	49.78	37.66	104.56	79.06	144.92	109.60
51	49.78	37.66	104.56	79.06	144.92	109.60
52	49.78	37.66	104.56	79.06	144.92	109.60
53	49.78	37.66	104.56	79.06	144.92	109.60
54	49.78	37.66	104.56	79.06	144.92	109.60
55	49.78	37.66	104.56	79.06	144.92	109.60
56	53.72	41.58	112.80	87.26	155.26	120.10
57	58.90	45.52	123.70	95.66	171.70	132.78
58	65.86	50.34	138.32	105.64	186.32	142.24
59	72.10	54.26	148.30	111.72	198.28	149.36
60	78.54	61.74	158.30	124.56	212.54	167.22
61	86.74	70.32	165.80	134.40	222.02	179.90
62	95.30	75.50	175.08	138.66	229.34	185.24
63	109.24	88.16	191.50	154.54	243.96	196.86
64	120.64	95.14	203.98	160.80	261.46	206.14
65	132.60	108.32	214.32	175.26	271.80	217.72
66	143.84	115.28	225.06	180.42	283.58	227.36
67	162.04	128.68	246.64	195.94	310.88	247.00
68	179.54	146.16	269.66	219.52	343.20	279.32
69	199.34	158.48	290.90	231.28	369.06	293.42
70	219.86	174.54	311.60	247.34	412.60	327.48
71	239.14	189.88	331.40	263.24	417.08	331.24
72	266.46	212.02	358.18	285.02	440.64	350.70
73	296.98	238.80	389.78	313.38	469.00	377.10
74	324.62	261.26	415.82	334.62	496.30	399.40
75	360.14	286.26	449.92	357.66	539.68	429.04
76	395.14	312.86	481.32	381.04	565.92	447.94
77	437.42	349.62	528.26	422.08	622.12	497.04
78	477.24	380.32	561.28	447.22	668.54	532.74
79	510.60	410.82	589.66	474.54	717.62	577.52

EXHIBIT XIV

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

2 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	41.94	31.40	87.98	66.02	122.08	91.54
51	41.94	31.40	87.98	66.02	122.08	91.54
52	41.94	31.40	87.98	66.02	122.08	91.54
53	41.94	31.40	87.98	66.02	122.08	91.54
54	41.94	31.40	87.98	66.02	122.08	91.54
55	41.94	31.40	87.98	66.02	122.08	91.54
56	46.78	33.74	98.34	70.86	135.46	97.62
57	50.50	38.20	106.00	80.32	147.24	111.54
58	55.50	42.66	116.36	89.76	156.68	120.80
59	60.32	46.06	124.20	94.94	166.16	126.90
60	68.88	50.70	139.02	102.08	183.10	137.06
61	73.88	55.14	141.16	105.28	189.00	141.00
62	83.70	63.02	153.84	115.64	201.48	147.94
63	92.44	67.46	161.88	118.32	206.30	150.80
64	105.84	76.40	179.00	129.22	229.50	165.60
65	115.82	84.42	187.22	136.34	242.16	176.32
66	129.40	93.36	202.20	145.98	254.68	184.02
67	142.78	101.20	217.56	154.00	274.12	194.16
68	157.60	113.50	236.64	170.44	301.06	216.86
69	171.14	122.60	249.86	178.82	316.94	226.84
70	184.70	134.90	261.80	191.32	346.58	253.24
71	203.26	147.24	281.62	204.18	354.42	256.98
72	221.66	160.80	297.86	216.14	366.38	265.92
73	240.22	177.04	315.16	232.38	379.24	279.64
74	263.58	194.00	337.66	248.42	402.98	296.44
75	290.54	211.32	363.18	264.14	435.64	316.78
76	318.92	231.64	388.52	282.16	456.68	331.76
77	346.04	253.06	417.78	305.54	492.02	359.76
78	374.42	274.30	440.28	322.66	524.34	384.44
79	406.34	295.72	469.36	341.58	571.26	415.82
80		320.52				
81		346.22				
82		375.50				
83		404.76				
84		442.94				

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

LIFETIME BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	86.54	65.36	181.68	137.32	277.04	209.54
51	86.54	65.36	181.68	137.32	277.04	209.54
52	86.54	65.36	181.68	137.32	277.04	209.54
53	86.54	65.36	181.68	137.32	277.04	209.54
54	86.54	65.36	181.68	137.32	277.04	209.54
55	86.54	65.36	181.68	137.32	277.04	209.54
56	94.28	73.06	197.76	153.40	299.52	232.46
57	101.76	78.86	213.82	165.62	326.74	253.04
58	113.36	86.54	238.04	181.68	352.66	269.12
59	124.92	94.28	257.08	193.90	378.14	285.16
60	136.48	107.78	275.08	217.06	406.22	320.52
61	151.92	122.98	290.08	235.22	427.20	335.74
62	165.20	130.68	303.60	240.40	437.30	350.50
63	188.36	151.92	330.14	266.30	462.76	373.20
64	209.54	165.40	354.16	279.60	499.42	394.20
65	230.52	188.54	373.00	304.66	530.68	433.44
66	251.74	201.82	393.76	316.04	545.68	437.92
67	280.66	223.04	427.20	339.60	592.18	470.72
68	309.36	251.96	464.48	378.36	650.24	529.60
69	346.04	275.08	505.00	401.28	704.66	560.04
70	382.42	303.80	542.04	430.64	789.28	627.10
71	418.84	332.72	580.58	461.06	803.64	638.04
72	461.28	367.22	619.82	493.64	838.78	668.00
73	511.18	411.58	671.02	540.14	888.24	715.16
74	563.04	453.76	721.40	581.44	946.96	763.36
75	626.48	498.12	782.86	622.40	999.98	821.20
76	691.80	548.02	842.64	667.58	999.98	863.40
77	757.16	605.68	914.40	731.42	999.98	947.62
78	822.50	655.80	967.32	771.28	999.98	999.98
79	885.92	713.42	999.98	824.00	999.98	999.98

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

4 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	66.62	48.00	139.68	100.90	193.68	139.90
51	66.62	48.00	139.68	100.90	193.68	139.90
52	66.62	48.00	139.68	100.90	193.68	139.90
53	66.62	48.00	139.68	100.90	193.68	139.90
54	66.62	48.00	139.68	100.90	193.68	139.90
55	66.62	48.00	139.68	100.90	193.68	139.90
56	72.44	53.78	152.12	112.92	209.54	155.54
57	78.40	58.08	164.54	121.68	228.60	169.06
58	87.22	63.64	183.20	133.70	246.60	179.98
59	96.22	69.22	197.76	142.70	264.38	190.68
60	105.00	79.28	211.66	159.60	284.30	214.24
61	116.78	90.40	223.24	172.92	298.88	225.20
62	127.04	96.22	233.52	176.76	305.96	238.04
63	144.82	111.64	254.08	195.82	323.72	249.62
64	161.12	121.68	272.30	205.68	349.00	263.74
65	177.38	138.62	286.88	224.12	366.76	281.30
66	193.68	148.48	302.92	232.24	383.92	296.96
67	215.76	164.12	328.66	249.82	414.14	314.96
68	238.04	185.32	357.36	278.08	454.84	353.96
69	266.08	202.24	388.44	295.00	492.76	374.28
70	294.16	223.48	416.92	316.66	551.88	419.30
71	322.22	244.68	446.72	339.14	562.18	426.76
72	354.80	270.16	476.90	362.96	586.82	446.50
73	393.14	302.52	516.12	397.22	621.12	477.98
74	433.20	333.80	554.90	427.42	662.24	510.12
75	481.84	366.14	602.26	457.64	722.42	548.90
76	532.18	403.00	648.28	490.84	762.28	576.98
77	582.56	445.44	703.40	537.76	828.50	633.32
78	632.66	482.28	744.08	567.12	886.34	675.50
79	681.52	524.72	787.12	605.88	958.10	737.44

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

3 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	59.78	45.22	125.54	94.92	173.96	131.54
51	59.78	45.22	125.54	94.92	173.96	131.54
52	59.78	45.22	125.54	94.92	173.96	131.54
53	59.78	45.22	125.54	94.92	173.96	131.54
54	59.78	45.22	125.54	94.92	173.96	131.54
55	59.78	45.22	125.54	94.92	173.96	131.54
56	64.52	49.92	135.40	104.76	186.38	144.20
57	70.70	54.64	148.48	114.84	206.12	159.38
58	79.08	60.40	166.04	126.82	223.68	170.76
59	86.54	65.14	178.06	134.12	238.04	179.36
60	94.28	74.14	190.06	149.54	255.16	200.76
61	104.14	84.40	199.06	161.32	266.54	215.98
62	114.40	90.64	210.16	166.48	275.30	222.38
63	131.14	105.84	229.88	185.52	292.90	236.30
64	144.82	114.22	244.90	193.04	313.88	247.46
65	159.20	130.06	257.30	210.38	326.30	261.38
66	172.70	138.40	270.16	216.60	340.44	272.92
67	194.52	154.48	296.08	235.22	373.20	296.50
68	215.52	175.48	323.72	263.52	412.00	335.30
69	239.32	190.24	349.22	277.66	443.06	352.22
70	263.92	209.54	374.06	296.96	495.34	393.14
71	287.08	227.96	397.84	316.04	500.68	397.64
72	319.90	254.52	430.00	342.16	528.98	421.00
73	356.52	286.66	467.90	376.22	563.04	452.68
74	389.72	313.66	499.20	401.72	595.82	479.48
75	432.36	343.66	540.14	429.34	647.88	515.04
76	474.34	375.58	577.82	457.42	679.36	537.76
77	525.12	419.72	634.18	506.72	746.86	596.68
78	572.90	456.56	673.80	536.90	802.56	639.52
79	612.96	493.18	707.86	569.68	861.48	693.28

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

2 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	50.36	37.70	105.62	79.28	146.56	109.90
51	50.36	37.70	105.62	79.28	146.56	109.90
52	50.36	37.70	105.62	79.28	146.56	109.90
53	50.36	37.70	105.62	79.28	146.56	109.90
54	50.36	37.70	105.62	79.28	146.56	109.90
55	50.36	37.70	105.62	79.28	146.56	109.90
56	56.14	40.48	118.06	85.06	162.62	117.20
57	60.64	45.84	127.28	96.40	176.76	133.92
58	66.62	51.22	139.68	107.78	188.08	145.06
59	72.44	55.28	149.12	114.00	199.46	152.32
60	82.68	60.86	166.90	122.54	219.82	164.54
61	88.70	66.22	169.46	126.40	226.90	169.24
62	100.48	75.62	184.68	138.84	241.90	177.60
63	110.98	80.98	194.32	142.06	247.66	181.06
64	127.04	91.68	214.90	155.12	275.52	198.84
65	139.06	101.36	224.74	163.70	290.74	211.66
66	155.32	112.06	242.74	175.28	305.74	220.88
67	171.40	121.48	261.16	184.90	329.06	233.12
68	189.20	136.28	284.08	204.60	361.44	260.32
69	205.48	147.20	299.96	214.68	380.50	272.30
70	221.74	161.96	314.30	229.66	416.06	304.00
71	244.04	176.76	338.06	245.08	425.48	308.52
72	266.08	193.04	357.58	259.46	439.88	319.22
73	288.36	212.52	378.36	278.96	455.28	335.74
74	316.46	232.90	405.36	298.22	483.76	355.88
75	348.80	253.68	436.00	317.08	522.98	380.30
76	382.88	278.08	466.42	338.74	548.28	398.30
77	415.44	303.80	501.56	366.76	590.68	431.90
78	449.50	329.30	528.56	387.36	629.44	461.48
79	487.84	355.00	563.44	410.06	685.80	499.20
80		384.76				
81		415.64				
82		450.76				
83		485.90				
84		531.76				

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

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-129009929
Policy Forms: Nursing Home Indemnity Policy 30240-VA and 30240-VA1

Dear Commissioner Cunningham:

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

30240–VA and 30240-VA1 are existing individual policy forms providing benefits to individuals for confinement in a nursing home and was previously approved in 1989 and 1992, respectively. These forms were issued in Virginia from August 1989 through May 1993 and are no longer being marketed in any state, and, outside of Virginia, was last issued in 1994.

The company is requesting the approval of a premium rate increase on the above-listed forms. At this time, a premium rate increase of 20% is being requested on the nursing home portion of the premium only. Although a larger premium rate increase is currently supportable, to minimize the impact on policyowners to the extent we can, an increase of only 20% is being requested at this time. Unless emerging experience improves, we believe it is likely that additional rate increases will be requested in the future.

As noted in the attached actuarial memorandum, three prior increases have been approved and implemented on this form. A 29% increase was approved in November 2005 and implemented on each contract's next policy anniversary beginning in March 2006. A 15% increase was approved in March 2009 and implemented on each contract's next policy anniversary beginning in June 2009. A 20.3% increase was approved in November 2011 and implemented on each contract's next policy anniversary beginning in March 2012. These prior increases only applied to the nursing home portion of premium; no increase has been or is being requested for the premium associated with the optional home care rider.

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

As with the prior increases, 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.

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

Thank you for your assistance in reviewing this filing.

Respectfully,

Anju Gupta-Lavey

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

Enclosures

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milliman.com

August 1, 2013

To: Virginia Bureau of Insurance

RE: RiverSource Life Insurance Company
Company NAIC # 65005
SERFF Tracking # AERS-129009929
Policy Forms: Nursing Home Indemnity Policy 30240-VA and 30240-VA1

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,

Amy Pahl

Amy Pahl, FSA, MAAA
Principal and Consulting Actuary

AP/mag

Review Requirements Checklist
RATE REVISIONS

REVIEW REQUIREMENTS	REFERENCE	COMMENTS
General Filing Requirements		
	14 VAC 5-100-40	**For Paper Filings:** A letter of transmittal must be submitted in duplicate with each filing.
	14 VAC 5-100-40 6	**For Paper Filings:** 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 mounts 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[1]. 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	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	REFERENCE	COMMENTS
Pre-Standardized Medicare Supplement Forms	14 VAC 5-170-120 A 3	For policies issued prior to July 30, 1992, expected claims in relation to premiums shall meet: a. The originally filed anticipated loss ratio when combined with the actual experience since inception; 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 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.
Annual Rate and Experience Filing	14 VAC 5-170-120 C	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.
Actuarial Certification for Medicare Supplement Rate Filings	14 VAC 5-170-120 C	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: 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; 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; 3. Except for policies issued prior to July 30, 1992, the filed rates maintain the proper relationship between policies which had different rating methodologies; 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 www.actuary.org; 5. The filing is in compliance with the applicable laws and regulations in this Commonwealth; and 6. The premiums are reasonable in relation to the benefits provided.

REVIEW REQUIREMENTS	REFERENCE	COMMENTS
Actuarial Certification for Medicare Supplement Rate Filings	14 VAC 5-170-130 B	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: 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; 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; 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: www.actuary.org; 4. The filing is in compliance with applicable laws and regulations in this Commonwealth; and 5. The premiums are reasonable in relation to the benefits provided.
Change in the Rating Structure or Methodology of a Medicare Supplement Form	14 VAC 5-170-130 D 3	A change in the rating structure or methodology shall be considered a discontinuance under subdivision 1 of t his subsection unless the issuer complies with the following requirements: 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. 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.

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

[1] Actual and projected experience are based on historical experience through March 31, 2013, which is the most recent data available.

RiverSource Life Insurance Company
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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-129009929
Policy Forms: Nursing Home Indemnity Policy 30240-VA and 30240-VA1

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. *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.*

   Policies in the 30240 series had an originally priced-for lifetime incurred loss ratio of 55.0%, 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.

2. *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 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 84.5%, 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

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reflect the accumulated 78.5% rate increases as approved in Virginia and implemented from 2006 through 2013 on a nationwide basis, and the incurred lifetime loss ratios correspond to Exhibit IX 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 Forms: 30240

Assumptions	Incurred Lifetime Loss Ratio	Impact on Incurred Lifetime Loss Ratio	Increase Need to Produce a Lifetime Incurred Loss Ratio of 84.5%
Historical Experience through 3/31/2013 & Projections with Original Pricing Assumptions	84.5%	N/A	N/A
Historical Experience through 3/31/2013 & Projections with Original Pricing Assumptions except for Current:			
Morbidity	89.0%	4.5%	124.5%
Mortality	84.8%	0.3%	7.0%
Lapse	87.0%	2.5%	59.8%
Historical Experience through 3/31/2013 & Projections with All Current Assumptions	92.8%	8.3%	195.4%

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. 8.3%) is greater than the sum of each changed assumption's impact on the incurred lifetime loss ratio (i.e. 7.3% = 4.5% + 0.3% + 2.5%).

As can be seen by the results in Table 1, a rate increase that far exceeds the requested 20% increase is justified; however, we have chosen to limit the current rate increase request to 20% 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 a 181.8% rate increase was justifiable (SERFF Tracking #AERS-126909918, response letters dated June 29, 2011 and November 11, 2011). However, we chose to limit the requested rate increase at that time to 20.3% to minimize the impact on policyholders to the extent that we could.

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.

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3. *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 increases on this policy form, we believe that two (or possibly more) additional 15% rate increases would likely be requested if experience emerges with our current best estimate assumptions. If experience deteriorates from the current best estimates, we might pursue additional increases beyond that level.

4. *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 114.2% 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.

5. *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 IX and X 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 IX and X 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 IX are based on the premium inforce at the time of projection, adjusted to reflect the cumulative 78.5% rate increases as previously approved in Virginia and implemented on a nationwide basis, and the projected earned premium for each policy in Exhibit X 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 114.2% proposed increase from inception.

   The projected paid and incurred claims for each policy in Exhibits IX and X 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 IX and X and Attachments 3 and 4 are a summary of the seriatim-level results produced in the

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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.

6. *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 2005.

   As this attachment shows, the cumulative 114.2% premium increase currently requested in Virginia has been approved in 26 states. We have rate increase requests pending in California, Idaho, Indiana, Louisiana, Ohio, Oregon and Rhode Island to bring premium increases to the cumulative 114.2% currently requested in Virginia, and we will soon request a 20% rate increase request in Louisiana to bring premium increases to the cumulative 114.2% currently requested in Virginia. In addition to recently approved rate increase requests, in 2014, the company anticipates requesting a 2.6% rate increase in Iowa, a 4.3% rate increase in Maryland, New Mexico, North Dakota and Pennsylvania, a 9.1% rate increase in New Hampshire, a 10% rate increase in Texas, a 10.6% rate increase in Arizona, a 14% rate increase in Kansas and a 20% rate increase in Connecticut to bring premiums in these states to the level currently requested in Virginia and rate increases in Hawaii and Maine to move premiums towards the level currently requested in Virginia. We will also soon request rate increases in Florida and Vermont to move premiums towards the level currently requested in Virginia. Due to immaterial size, no rate increase is being requested in the District of Columbia at this time.

7. *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.

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8. *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.

9. *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.

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Respectfully,

Anju Gupta-Lavey

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 IX and X Actuarial Memorandum, and Attachments 3 and 4 of this Response

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

Policy Forms: 30240-VA and 30240-VA1

Original Pricing Assumptions

Mortality: 1983 Individual Annuitant Mortality Table

Lapse Rates:

Duration	Rate
1	11%
2	8%
3	7%
4	6%
5+	5%

Morbidity: Pricing frequencies and severities of claims were originally developed using 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 identifiable for the combinations of elimination periods and maximum benefit limits. This data represented the expected claim costs of the non-increasing benefit nursing home stay. A loading in claim costs was then applied for both the post confinement benefit and waiver of premium benefits. Claim costs for the increasing benefit plan were adjusted appropriately to reflect the 5% annual increase.

The following selection factors were used:

Duration	Factor
1	40%
2	50%
3	60%
4	70%
5	80%
6	90%
7+	100%

Interest Rate: 7.5%

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

Policy Forms: 30240-VA and 30240-VA1

Current Assumptions

Mortality: 1983 Individual Annuitant Mortality Basic Table with selection.

Mortality Selection Factors

	Issue Age Band					
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%	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 Forms: 30240-VA and 30240-VA1

Current Assumptions (continued)

Lapse Rates:

Lifetime Benefit

	Issue Age Band		
Duration	<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%

Non-Lifetime Benefit

	Issue Age Band		
Duration	<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%

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 Forms: 30240-VA and 30240-VA1

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

	Issue Age Band						
Duration	<53	53–57	58–62	63–67	68–72	73–77	78+
1	0.45	0.45	0.80	0.90	1.30	1.70	1.70
2	0.45	0.45	0.85	0.95	1.30	1.70	1.70
3	0.50	0.50	0.85	0.95	1.30	1.70	1.70
4	0.50	0.50	0.90	1.00	1.30	1.70	1.70
5	0.50	0.50	0.90	1.10	1.30	1.70	1.70
6	0.50	0.50	0.90	1.20	1.30	1.35	1.40
7	0.50	0.50	0.95	1.20	1.30	1.35	1.40
8	0.50	0.50	1.00	1.30	1.30	1.35	1.40
9	0.50	0.50	1.05	1.30	1.30	1.35	1.40
10	0.65	0.65	1.10	1.35	1.35	1.35	1.40
11	0.70	0.70	1.15	1.45	1.40	1.35	1.40
12	0.75	0.75	1.20	1.45	1.40	1.35	1.40
13	0.80	0.80	1.25	1.45	1.40	1.35	1.40
14	0.85	0.85	1.30	1.45	1.40	1.35	1.40
15	0.90	0.90	1.35	1.45	1.50	1.35	1.40
16	0.95	0.95	1.40	1.50	1.55	1.35	1.40
17	0.95	1.00	1.45	1.60	1.60	1.35	1.40
18	0.95	1.10	1.50	1.70	1.65	1.35	1.40
19	0.95	1.10	1.50	1.70	1.65	1.35	1.40
20	0.95	1.10	1.50	1.70	1.70	1.35	1.40
21	0.95	1.10	1.50	1.70	1.70	1.35	1.40
22	0.95	1.10	1.50	1.70	1.70	1.35	1.40
23	1.00	1.10	1.50	1.70	1.70	1.35	1.40
24	1.00	1.10	1.50	1.70	1.70	1.35	1.40
25	1.05	1.10	1.50	1.70	1.70	1.40	1.40
26	1.05	1.10	1.50	1.70	1.70	1.40	1.40
27	1.05	1.10	1.50	1.70	1.70	1.40	1.45
28	1.05	1.10	1.50	1.70	1.70	1.45	1.45
29	1.05	1.10	1.50	1.70	1.70	1.45	1.45
30+	1.10	1.10	1.50	1.70	1.70	1.45	1.45

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

Policy Forms: 30240-VA and 30240-VA1

Current Assumptions (continued)

Morbidity (continued): **Non-Lifetime Benefit Actual-to-Expected Adjustment Factors**

	Age at Issue							
Duration	<53	53–57	58–62	63–67	68–72	73–77	78-82	83+
1	0.20	0.20	0.25	0.45	0.75	0.80	0.80	1.70
2	0.20	0.20	0.30	0.55	0.75	0.80	1.15	1.70
3	0.20	0.20	0.35	0.55	0.80	0.80	1.25	1.70
4	0.25	0.25	0.45	0.65	0.80	0.95	1.40	1.70
5	0.25	0.25	0.50	0.65	0.80	1.00	1.40	1.70
6	0.30	0.30	0.55	0.70	0.90	1.00	1.40	1.70
7	0.30	0.30	0.55	0.70	0.90	1.00	1.40	1.70
8	0.30	0.30	0.60	0.80	1.00	1.00	1.40	1.70
9	0.35	0.35	0.60	0.80	1.00	1.20	1.40	1.70
10	0.35	0.35	0.65	0.90	1.00	1.20	1.40	1.70
11	0.35	0.35	0.70	0.95	1.20	1.20	1.40	1.65
12	0.35	0.45	0.75	1.00	1.20	1.20	1.40	1.65
13	0.35	0.45	0.80	1.05	1.20	1.25	1.40	1.65
14	0.35	0.50	0.85	1.10	1.20	1.25	1.40	1.65
15	0.35	0.55	0.90	1.15	1.20	1.30	1.40	1.65
16	0.35	0.55	0.90	1.15	1.40	1.30	1.40	1.65
17	0.55	0.65	1.00	1.15	1.40	1.30	1.40	1.65
18	0.55	0.75	1.05	1.15	1.40	1.30	1.40	1.70
19	0.55	0.75	1.05	1.15	1.40	1.30	1.40	1.80
20	0.75	0.75	1.05	1.15	1.40	1.30	1.40	1.80
21	0.75	0.75	1.05	1.15	1.40	1.30	1.40	1.80
22	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
23	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
24	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
25	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
26	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
27	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
28	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
29	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
30	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
31	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
32	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
33	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
34	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
35+	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80

The following adverse selection factors are used:

Year of Policyholder Notification *	Without Current Requested Increase	With Current Requested Increase
1	0.0%	2.8%
2	0.0%	1.8%
3	0.0%	0.8%
4	0.0%	0.0%

* For currently requested increase

Interest Rate: 7.5%

Attachment 2
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Form: 30240-VA and 30240-VA1

Prior 2011 Rate Increase Filing Assumptions:

Mortality: 1983 Individual Annuitant Mortality Basic Table with selection.

Mortality Selection Factors

	Issue Age Band					
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%

Attachment 2
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Form: 30240-VA and 30240-VA1

Prior 2011 Rate Increase Filing Assumptions (cont):

Voluntary Lapse Rates:

Lifetime Benefit

	Issue Age Band		
Duration	<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%

Non-Lifetime Benefit

	Issue Age Band		
Duration	<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%

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 2
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Form: 30240-VA and 30240-VA1

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

	Issue Age Band							
Duration	<48	48-52	53–57	58–62	63–67	68–72	73–77	78+
1	0.45	0.45	0.40	0.80	0.80	1.50	1.80	1.50
2	0.28	0.45	0.40	0.80	0.80	1.50	1.80	1.50
3	0.26	0.45	0.40	0.80	0.80	1.50	1.80	1.50
4	0.23	0.45	0.40	0.80	0.80	1.50	1.80	1.50
5	0.21	0.45	0.40	0.80	0.80	1.50	1.80	1.50
6	0.20	0.45	0.40	0.80	1.00	1.50	1.80	1.50
7	0.29	0.45	0.40	0.80	1.00	1.15	1.30	1.80
8	0.32	0.45	0.40	0.80	1.35	1.15	1.30	1.80
9	0.36	0.45	0.40	0.90	1.35	1.15	1.30	1.35
10	0.38	0.45	0.75	0.90	1.35	1.15	1.30	1.35
11	0.41	0.45	0.75	0.90	1.35	1.35	1.30	1.35
12	0.45	0.45	0.75	0.90	1.35	1.40	1.30	1.50
13	0.45	0.45	0.75	1.10	1.35	1.40	1.30	1.55
14	0.45	0.45	0.75	1.20	1.35	1.40	1.30	1.55
15	0.45	0.45	0.75	1.40	1.35	1.55	1.30	1.55
16	0.45	0.45	0.75	1.40	1.35	1.55	1.30	1.55
17	0.45	0.50	0.80	1.40	1.50	1.55	1.40	1.55
18	0.45	0.60	1.15	1.40	1.50	1.55	1.40	1.55
19	0.45	0.70	1.15	1.40	1.50	1.55	1.45	1.55
20	0.45	0.70	1.15	1.40	1.50	1.55	1.45	1.55
21	0.45	0.85	1.15	1.40	1.50	1.55	1.45	1.55
22	0.50	0.85	1.15	1.40	1.50	1.55	1.45	1.55
23	0.60	0.95	1.15	1.40	1.50	1.55	1.45	1.55
24	0.70	0.95	1.15	1.40	1.50	1.55	1.45	1.55
25	0.70	1.00	1.15	1.40	1.50	1.55	1.45	1.55
26	0.85	1.00	1.15	1.40	1.50	1.55	1.45	1.55
27	0.85	1.10	1.15	1.40	1.50	1.55	1.45	1.55
28	0.95	1.10	1.15	1.40	1.50	1.55	1.45	1.55
29	0.95	1.10	1.15	1.40	1.50	1.55	1.45	1.55
30	1.00	1.10	1.15	1.40	1.50	1.55	1.45	1.55
31	1.00	1.10	1.15	1.40	1.50	1.55	1.45	1.55
32+	1.10	1.10	1.15	1.40	1.50	1.55	1.45	1.55

Attachment 2
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Form: 30240-VA and 30240-VA1

Prior 2011 Rate Increase Filing Assumptions (cont):

Morbidity (continued):

Non-Lifetime Benefit Actual-to-Expected Adjustment Factors

	Age at Issue								
Duration	**<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	0.30	0.75	0.85	1.40	1.80
2	0.06	0.10	0.10	0.20	0.30	0.75	0.85	1.40	1.80
3	0.06	0.10	0.10	0.20	0.30	0.75	0.85	1.40	1.80
4	0.05	0.10	0.10	0.30	0.50	0.85	0.95	1.40	1.80
5	0.05	0.20	0.20	0.30	0.50	0.85	0.95	1.40	1.80
6	0.04	0.20	0.20	0.50	0.50	0.85	0.95	1.40	1.80
7	0.07	0.20	0.20	0.60	0.50	0.85	0.95	1.40	1.70
8	0.07	0.20	0.20	0.60	0.50	0.85	1.00	1.40	1.70
9	0.08	0.30	0.30	0.60	0.65	0.85	1.25	1.40	1.55
10	0.17	0.30	0.30	0.60	0.65	0.85	1.25	1.40	1.55
11	0.18	0.30	0.40	0.60	0.65	1.10	1.25	1.40	1.55
12	0.20	0.30	0.40	0.60	1.00	1.10	1.25	1.40	1.55
13	0.20	0.30	0.50	0.60	1.10	1.10	1.25	1.40	1.55
14	0.30	0.40	0.50	0.85	1.10	1.10	1.25	1.40	1.55
15	0.30	0.40	0.50	0.85	1.10	1.20	1.25	1.40	1.55
16	0.30	0.40	0.50	0.85	1.10	1.40	1.25	1.45	1.55
17	0.30	0.60	0.60	0.85	1.10	1.40	1.30	1.50	1.55
18	0.30	0.60	0.70	1.00	1.10	1.40	1.30	1.50	1.55
19	0.40	0.60	0.70	1.00	1.10	1.40	1.30	1.50	1.55
20	0.40	0.60	0.70	1.00	1.10	1.40	1.30	1.50	1.55
21	0.40	0.60	0.70	1.00	1.10	1.40	1.30	1.50	1.55
22	0.60	0.60	0.80	1.00	1.10	1.40	1.30	1.50	1.55
23	0.60	0.70	0.80	1.00	1.10	1.40	1.30	1.50	1.55
24	0.60	0.70	0.80	1.00	1.10	1.40	1.30	1.50	1.55
25	0.60	0.70	0.90	1.00	1.10	1.40	1.30	1.50	1.55
26	0.60	0.70	0.90	1.00	1.10	1.40	1.30	1.50	1.55
27	0.60	0.80	0.90	1.00	1.10	1.40	1.30	1.50	1.55
28	0.70	0.80	0.90	1.00	1.10	1.40	1.30	1.50	1.55
29	0.70	0.80	0.90	1.00	1.10	1.40	1.30	1.50	1.55
30	0.70	0.90	0.90	1.00	1.10	1.40	1.30	1.50	1.55
31	0.70	0.90	1.00	1.00	1.10	1.40	1.30	1.50	1.55
32	0.80	0.90	1.00	1.00	1.10	1.40	1.30	1.50	1.55
33	0.80	0.95	1.00	1.00	1.10	1.40	1.30	1.50	1.55
34	0.80	0.95	1.00	1.00	1.10	1.40	1.30	1.50	1.55
35	0.90	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
36	0.90	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
37	0.90	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
38	0.95	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
39	0.95	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
40+	1.00	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55

The following adverse selection factors are used:

Year of Policyholder Notification *	Without Current Requested Increase	With Current Requested Increase
1	0.0%	2.8%
2	0.0%	1.8%
3	0.0%	0.8%
4	0.0%	0.0%

* For currently requested increase

Interest Rate: 7.5%

Attachment 3
RiverSource Life Insurance Company
Nationwide Experience Projections
Experience with Premiums Restated to Proposed Virginia Premium Level since Inception*
Policy Form: 30240

		Loss Ratio Demonstration						Interest Rate Factors	
		Without Interest			With Interest			Calendar Year	Mid-Year
	Calendar Year	Earned Premiums	Incurred Claims	Loss Ratio	Earned Premiums	Incurred Claims	Loss Ratio	Effective Int Rate	Disc / Accum Factor
Historical Experience	1989	1,023,488	0	0.0%	5,702,086	0	0.0%	7.50%	5.5712
	1990	24,253,946	1,234	0.0%	125,697,017	6,395	0.0%	7.50%	5.1825
	1991	50,829,731	3,521,312	6.9%	245,048,420	16,976,127	6.9%	7.50%	4.8210
	1992	73,788,537	6,595,403	8.9%	330,913,539	29,577,874	8.9%	7.50%	4.4846
	1993	87,759,131	9,502,141	10.8%	366,108,221	39,640,457	10.8%	7.50%	4.1717
	1994	84,439,375	10,532,005	12.5%	327,682,852	40,871,425	12.5%	7.50%	3.8807
	1995	80,619,427	12,040,902	14.9%	291,031,465	43,466,958	14.9%	7.50%	3.6099
	1996	77,399,054	16,697,896	21.6%	259,912,658	56,072,965	21.6%	7.50%	3.3581
	1997	74,089,654	19,002,010	25.6%	231,441,309	59,358,491	25.6%	7.50%	3.1238
	1998	70,949,292	20,778,899	29.3%	206,168,787	60,380,595	29.3%	7.50%	2.9059
	1999	67,024,009	24,323,570	36.3%	181,174,381	65,749,688	36.3%	7.50%	2.7031
	2000	63,925,106	28,501,293	44.6%	160,742,004	71,667,538	44.6%	7.50%	2.5145
	2001	60,832,790	28,314,458	46.5%	142,294,197	66,230,451	46.5%	7.50%	2.3391
	2002	57,618,928	32,642,575	56.7%	125,373,620	71,027,315	56.7%	7.50%	2.1759
	2003	54,314,335	35,357,367	65.1%	109,937,787	71,566,940	65.1%	7.50%	2.0241
	2004	51,253,358	41,280,950	80.5%	96,504,238	77,727,330	80.5%	7.50%	1.8829
	2005	46,138,655	44,250,046	95.9%	80,812,870	77,504,929	95.9%	7.50%	1.7515
	2006	42,232,933	42,390,085	100.4%	68,811,080	69,067,132	100.4%	7.50%	1.6293
	2007	39,104,044	47,974,816	122.7%	59,268,010	72,712,988	122.7%	7.50%	1.5156
	2008	36,224,300	54,700,916	151.0%	51,072,864	77,123,158	151.0%	7.50%	1.4099
	2009	33,066,789	56,384,305	170.5%	43,368,436	73,950,306	170.5%	7.50%	1.3115
	2010	30,082,417	55,316,691	183.9%	36,701,685	67,488,452	183.9%	7.50%	1.2200
	2011	27,226,033	57,969,426	212.9%	30,899,339	65,790,594	212.9%	7.50%	1.1349
	2012	24,624,432	56,749,350	230.5%	25,996,961	59,912,472	230.5%	7.50%	1.0557
	1/2013-3/2013	5,680,811	17,234,990	303.4%	5,732,399	17,391,502	303.4%	7.50%	1.0091
Projected Future Experience	4/2013-12/2013	16,430,515	41,966,966	255.4%	15,990,903	40,844,106	255.4%	7.50%	0.9732
	2014	19,901,022	54,945,862	276.1%	18,180,875	50,196,612	276.1%	7.50%	0.9136
	2015	17,216,241	53,492,030	310.7%	14,630,841	45,459,016	310.7%	7.50%	0.8498
	2016	15,211,828	51,507,662	338.6%	12,025,521	40,718,740	338.6%	7.50%	0.7905
	2017	13,344,203	49,147,575	368.3%	9,813,110	36,142,328	368.3%	7.50%	0.7354
	2018	11,622,779	46,621,258	401.1%	7,950,886	31,892,572	401.1%	7.50%	0.6841
	2019	10,048,895	43,924,386	437.1%	6,394,630	27,951,351	437.1%	7.50%	0.6364
	2020	8,618,406	40,900,074	474.6%	5,101,708	24,211,000	474.6%	7.50%	0.5920
	2021	7,330,909	37,598,702	512.9%	4,036,807	20,703,941	512.9%	7.50%	0.5507
	2022	6,182,763	34,129,826	552.0%	3,167,046	17,482,590	552.0%	7.50%	0.5122
	2023	5,170,146	30,597,671	591.8%	2,463,576	14,579,801	591.8%	7.50%	0.4765
	2024	4,285,744	27,045,710	631.1%	1,899,682	11,988,178	631.1%	7.50%	0.4433
	2025	3,520,876	23,611,878	670.6%	1,451,767	9,735,916	670.6%	7.50%	0.4123
	2026	2,865,728	20,360,721	710.5%	1,099,190	7,809,640	710.5%	7.50%	0.3836
	2027	2,309,423	17,336,953	750.7%	824,011	6,185,889	750.7%	7.50%	0.3568
	2028	1,842,759	14,576,115	791.0%	611,631	4,837,965	791.0%	7.50%	0.3319
	2029	1,455,886	12,097,280	830.9%	449,510	3,735,083	830.9%	7.50%	0.3088
	2030	1,138,491	9,904,806	870.0%	326,989	2,844,788	870.0%	7.50%	0.2872
	2031	880,822	7,992,814	907.4%	235,333	2,135,479	907.4%	7.50%	0.2672
	2032	673,905	6,347,186	941.9%	167,489	1,577,496	941.9%	7.50%	0.2485
	2033	509,616	4,955,488	972.4%	117,821	1,145,684	972.4%	7.50%	0.2312
	2034	380,702	3,801,875	998.6%	81,876	817,651	998.6%	7.50%	0.2151
	2035	280,782	2,866,695	1021.0%	56,174	573,513	1021.0%	7.50%	0.2001
	2036	204,324	2,124,032	1039.5%	38,025	395,289	1039.5%	7.50%	0.1861
	2037	146,597	1,549,631	1057.1%	25,379	268,271	1057.1%	7.50%	0.1731
	2038	103,619	1,113,081	1074.2%	16,687	179,252	1074.2%	7.50%	0.1610
	2039	72,086	786,434	1091.0%	10,799	117,812	1091.0%	7.50%	0.1498
	2040	49,302	545,933	1107.3%	6,870	76,078	1107.3%	7.50%	0.1394
	2041	33,102	371,819	1123.3%	4,291	48,199	1123.3%	7.50%	0.1296
	2042	21,779	247,996	1138.7%	2,626	29,905	1138.7%	7.50%	0.1206
	2043	14,010	161,617	1153.6%	1,572	18,129	1153.6%	7.50%	0.1122
	2044	8,787	102,620	1167.9%	917	10,708	1167.9%	7.50%	0.1043
	2045	5,355	63,265	1181.5%	520	6,141	1181.5%	7.50%	0.0971
	2046	3,158	37,709	1194.2%	285	3,405	1194.2%	7.50%	0.0903
	2047	1,792	21,616	1206.0%	151	1,816	1206.0%	7.50%	0.0840
	2048	973	11,840	1216.6%	76	925	1216.6%	7.50%	0.0781
	2049	501	6,147	1225.9%	36	447	1225.9%	7.50%	0.0727
	2050	243	2,994	1233.8%	16	202	1233.8%	7.50%	0.0676
	2051	109	1,351	1240.2%	7	85	1240.2%	7.50%	0.0629
	2052	45	555	1244.9%	3	32	1244.9%	7.50%	0.0585
	Past	1,264,500,575	722,062,640	57.1%	3,608,396,222	1,351,262,081	37.4%		
	Future	151,888,220	642,878,173	423.3%	107,185,637	404,726,037	377.6%		
	Lifetime	1,416,388,796	1,364,940,814	96.4%	3,715,581,859	1,755,988,118	47.3%		

* Proposed Virginia rate schedule reflects a cumulative rate increase of 114.2% from three rate increases of 29%, 15% and 20.3% plus requested 20% rate increase.

Attachment 4
RiverSource Life Insurance Company
Virginia Experience Projections
Experience with Premiums Restated to Proposed Virginia Premium Level since Inception*
Policy Forms: 30240-VA and 30240-VA1

		Loss Ratio Demonstration						Interest Rate Factors	
		Without Interest			With Interest			Calendar Year	Mid-Year
	Calendar Year	Earned Premiums	Incurred Claims	Loss Ratio	Earned Premiums	Incurred Claims	Loss Ratio	Effective Int Rate	Disc / Accum Factor
Historical Experience	1989	27,695	0	0.0%	154,298	0	0.0%	7.50%	5.5712
	1990	602,389	0	0.0%	3,121,904	0	0.0%	7.50%	5.1825
	1991	1,168,795	0	0.0%	5,634,722	0	0.0%	7.50%	4.8210
	1992	1,724,343	53,373	3.1%	7,733,021	239,359	3.1%	7.50%	4.4846
	1993	2,094,557	24,919	1.2%	8,737,945	103,954	1.2%	7.50%	4.1717
	1994	1,988,451	413,394	20.8%	7,716,558	1,604,251	20.8%	7.50%	3.8807
	1995	1,923,149	554,583	28.8%	6,942,458	2,002,014	28.8%	7.50%	3.6099
	1996	1,870,638	2,396	0.1%	6,281,763	8,045	0.1%	7.50%	3.3581
	1997	1,800,376	618,125	34.3%	5,624,016	1,930,901	34.3%	7.50%	3.1238
	1998	1,716,391	294,992	17.2%	4,987,595	857,207	17.2%	7.50%	2.9059
	1999	1,620,794	918,808	56.7%	4,381,212	2,483,653	56.7%	7.50%	2.7031
	2000	1,559,251	1,646,254	105.6%	3,920,793	4,139,566	105.6%	7.50%	2.5145
	2001	1,486,497	1,051,602	70.7%	3,477,070	2,459,806	70.7%	7.50%	2.3391
	2002	1,415,060	448,640	31.7%	3,079,044	976,199	31.7%	7.50%	2.1759
	2003	1,335,280	731,674	54.8%	2,702,745	1,480,983	54.8%	7.50%	2.0241
	2004	1,278,493	1,083,618	84.8%	2,407,257	2,040,330	84.8%	7.50%	1.8829
	2005	1,179,837	1,308,118	110.9%	2,066,510	2,291,197	110.9%	7.50%	1.7515
	2006	1,101,367	1,642,783	149.2%	1,794,483	2,676,623	149.2%	7.50%	1.6293
	2007	1,028,888	482,136	46.9%	1,559,433	730,749	46.9%	7.50%	1.5156
	2008	969,008	1,829,748	188.8%	1,366,210	2,579,773	188.8%	7.50%	1.4099
	2009	897,336	1,842,307	205.3%	1,176,893	2,416,260	205.3%	7.50%	1.3115
	2010	834,619	744,376	89.2%	1,018,267	908,167	89.2%	7.50%	1.2200
	2011	762,923	1,950,459	255.7%	865,856	2,213,613	255.7%	7.50%	1.1349
	2012	692,744	1,087,929	157.0%	731,357	1,148,568	157.0%	7.50%	1.0557
	1/2013-3/2013	161,535	520,155	322.0%	163,002	524,879	322.0%	7.50%	1.0091
Projected Future Experience	4/2013-12/2013	467,077	1,245,727	266.7%	454,580	1,212,397	266.7%	7.50%	0.9732
	2014	568,784	1,642,331	288.7%	519,621	1,500,376	288.7%	7.50%	0.9136
	2015	495,097	1,606,389	324.5%	420,747	1,365,154	324.5%	7.50%	0.8498
	2016	440,138	1,552,395	352.7%	347,945	1,227,227	352.7%	7.50%	0.7905
	2017	388,397	1,489,204	383.4%	285,621	1,095,136	383.4%	7.50%	0.7354
	2018	340,309	1,418,643	416.9%	232,798	970,462	416.9%	7.50%	0.6841
	2019	295,946	1,344,625	454.3%	188,326	855,654	454.3%	7.50%	0.6364
	2020	255,270	1,257,783	492.7%	151,108	744,551	492.7%	7.50%	0.5920
	2021	218,385	1,158,811	530.6%	120,255	638,106	530.6%	7.50%	0.5507
	2022	185,237	1,053,963	569.0%	94,886	539,880	569.0%	7.50%	0.5122
	2023	155,794	944,439	606.2%	74,236	450,025	606.2%	7.50%	0.4765
	2024	129,889	835,513	643.3%	57,574	370,346	643.3%	7.50%	0.4433
	2025	107,325	732,325	682.3%	44,253	301,961	682.3%	7.50%	0.4123
	2026	87,869	635,982	723.8%	33,703	243,940	723.8%	7.50%	0.3836
	2027	71,225	546,525	767.3%	25,414	195,002	767.3%	7.50%	0.3568
	2028	57,156	464,432	812.6%	18,971	154,150	812.6%	7.50%	0.3319
	2029	45,409	389,986	858.8%	14,020	120,410	858.8%	7.50%	0.3088
	2030	35,702	322,170	902.4%	10,254	92,531	902.4%	7.50%	0.2872
	2031	27,764	261,968	943.6%	7,418	69,991	943.6%	7.50%	0.2672
	2032	21,344	209,099	979.7%	5,305	51,968	979.7%	7.50%	0.2485
	2033	16,211	163,732	1010.0%	3,748	37,854	1010.0%	7.50%	0.2312
	2034	12,158	125,865	1035.3%	2,615	27,069	1035.3%	7.50%	0.2151
	2035	8,997	94,929	1055.1%	1,800	18,992	1055.1%	7.50%	0.2001
	2036	6,566	70,495	1073.6%	1,222	13,119	1073.6%	7.50%	0.1861
	2037	4,722	51,562	1092.0%	817	8,926	1092.0%	7.50%	0.1731
	2038	3,343	37,116	1110.2%	538	5,977	1110.2%	7.50%	0.1610
	2039	2,327	26,265	1128.5%	349	3,935	1128.5%	7.50%	0.1498
	2040	1,591	18,245	1146.6%	222	2,543	1146.6%	7.50%	0.1394
	2041	1,066	12,417	1164.7%	138	1,610	1164.7%	7.50%	0.1296
	2042	698	8,260	1182.7%	84	996	1182.7%	7.50%	0.1206
	2043	446	5,353	1200.8%	50	600	1200.8%	7.50%	0.1122
	2044	276	3,367	1218.9%	29	351	1218.9%	7.50%	0.1043
	2045	165	2,046	1237.3%	16	199	1237.3%	7.50%	0.0971
	2046	95	1,195	1255.9%	9	108	1255.9%	7.50%	0.0903
	2047	52	666	1275.0%	4	56	1275.0%	7.50%	0.0840
	2048	27	352	1294.5%	2	27	1294.5%	7.50%	0.0781
	2049	13	174	1314.3%	1	13	1314.3%	7.50%	0.0727
	2050	6	80	1334.4%	0	5	1334.4%	7.50%	0.0676
	2051	2	34	1354.9%	0	2	1354.9%	7.50%	0.0629
	2052	1	13	1376.0%	0	1	1376.0%	7.50%	0.0585
	Past	31,240,417	19,250,388	61.6%	87,644,409	35,816,097	40.9%		
	Future	4,452,883	19,734,475	443.2%	3,118,680	12,321,651	395.1%		
	Lifetime	35,693,300	38,984,863	109.2%	90,763,089	48,137,748	53.0%		

* Proposed Virginia rate schedule reflects a cumulative rate increase of 114.2% from three rate increases of 29%, 15% and 20.3% plus requested 20% rate increase.

Attachment 5
RiverSource Life Insurance Company
Status of Long Term Care Rate Filings as of December 3, 2013
Policy Form: 30240

	Initial Nationwide Request			Follow-Up Request			Second Nationwide Request			Third Nationwide Request			Follow-Up Request			Fourth Nationwide Request					
State	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 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	Cumulative Rate Increases Approved	Annualized Premium as of March 31, 2013
Alabama	11/3/2004	35.0%	2/1/2005				12/11/2007	15.0%	4/1/2008	12/17/2008	15.0%	4/1/2009				11/12/2012	12/4/2012	20.0%	4/1/2013	114.2%	208,781
Alaska [1]	8/12/2004	35.0%	1/1/2005				Not Required	15.0%	4/1/2008	Not Required	15.0%	4/1/2009				Not Required	Not Required	20.0%	4/1/2013	114.2%	0
Arizona	4/4/2005	25.0%	7/1/2005	4/6/2007	8.0%	7/1/2007	4/2/2008	15.0%	7/1/2008	2/3/2009	15.0%	7/1/2009				6/27/2013	8/7/2013	8.5%	11/1/2013	93.7%	273,086
Arkansas [2]	9/15/2005	35.0%	12/1/2005				12/11/2007	15.0%	4/1/2008	12/17/2008	15.0%	4/1/2009				11/12/2012	12/4/2012	20.0%	4/1/2013	114.2%	125,962
California	12/15/2004	25.0%	4/1/2005	11/1/2006	8.0%	5/1/2007	11/5/2009	15.0%	3/1/2010	9/9/2011	15.0%	12/1/2011				12/18/2012				78.5%	1,719,190
Colorado	3/10/2005	35.0%	6/1/2005				4/28/2008	15.0%	8/1/2008	9/1/2009	15.0%	12/1/2009				6/11/2013	8/8/2013	20.0%	1/1/2014	114.2%	276,884
Connecticut	4/7/2008	10.0%	7/1/2008	3/9/2009	10.0%	7/1/2009	3/1/2011	21.5%	10/1/2011	9/24/2013	21.4%	1/1/2014								78.5%	465,660
Delaware	12/29/2004	20.0%	3/1/2005	1/30/2007	12.5%	5/1/2007	7/23/2008	15.0%	10/1/2008	9/21/2009	15.0%	12/1/2009				1/28/2013	3/6/2013	20.0%	6/1/2013	114.2%	73,256
District of Columbia	Not Filing						Not Filing			Not Filing										0.0%	6,128
Florida	10/20/2008	7.0%	1/1/2009	Not Yet Submitted																7.0%	505,434
Georgia [2]	11/3/2004	35.0%	3/1/2005				12/11/2007	15.0%	4/1/2008	12/17/2008	15.0%	4/1/2009				11/12/2012	12/4/2012	20.0%	4/1/2013	114.2%	91,354
Hawaii	5/3/2006	25.0%	8/1/2006	6/16/2008	8.0%	9/1/2008	8/31/2010	15.0%	12/1/2010	7/8/2013	6.6%	10/1/2013								65.5%	325,042
Idaho	12/1/2004	35.0%	3/1/2005				1/24/2008	15.0%	4/1/2008	1/16/2009	15.0%	4/1/2009				6/4/2013				78.5%	46,213
Illinois	10/29/2004	35.0%	2/1/2005				2/8/2008	15.0%	5/1/2008	1/8/2009	15.0%	5/1/2009				11/7/2012	7/1/2013	20.0%	10/1/2013	114.2%	1,197,092
Indiana	11/9/2004	35.0%	4/1/2005				4/25/2008	15.0%	8/1/2008	5/22/2009	15.0%	8/1/2009				6/4/2013				78.5%	538,257
Iowa	7/1/2005	35.0%	10/1/2005				4/17/2008	15.0%	7/1/2008	12/21/2009	15.0%	3/1/2010				12/4/2012	4/18/2013	17.0%	8/1/2013	108.9%	1,050,216
Kansas	1/11/2005	25.0%	4/1/2005	1/9/2007	8.0%	5/1/2007	3/6/2009	15.0%	6/1/2009	3/22/2010	10.0%	6/1/2010				1/15/2013	9/13/2013	10.0%	12/1/2013	87.9%	567,230
Kentucky	12/17/2004	25.0%	3/1/2005	10/2/2006	8.0%	5/1/2007	1/15/2008	15.0%	5/1/2008	3/4/2009	15.0%	6/1/2009				1/28/2013	4/23/2013	20.0%	8/1/2013	114.2%	156,734
Louisiana	10/15/2004	35.0%	3/1/2005				12/15/2009	15.0%	7/1/2010	6/6/2012	15.0%	9/1/2012								78.5%	83,100
Maine	12/7/2004	35.0%	3/1/2005				1/29/2008	15.0%	5/1/2008	9/17/2013	9.0%	1/1/2014								69.2%	57,152
Maryland	12/28/2004	20.0%	3/1/2005	10/31/2006	12.5%	5/1/2007	1/29/2008	15.0%	5/1/2008	10/15/2010	15.0%	1/1/2011				1/18/2013	6/17/2013	15.0%	9/1/2013	105.3%	207,831
Massachusetts [2]	11/3/2004	35.0%	3/1/2005				12/11/2007	15.0%	4/1/2008	12/17/2008	15.0%	4/1/2009				11/12/2012	12/4/2012	20.0%	4/1/2013	114.2%	951,266
Michigan	10/1/2004	35.0%	2/1/2005				4/21/2008	15.0%	7/1/2008	2/5/2009	15.0%	7/1/2009				11/28/2012	12/5/2012	20.0%	4/1/2013	114.2%	1,122,683
Mississippi	12/6/2004	25.0%	3/1/2005	1/29/2007	8.0%	7/1/2007	3/20/2008	15.0%	7/1/2008	4/23/2009	15.0%	7/1/2009				2/27/2013	4/22/2013	20.0%	8/1/2013	114.2%	49,416
Missouri	12/22/2004	21.0%	3/1/2005	10/10/2006	11.6%	5/1/2007	3/6/2008	15.0%	6/1/2008	3/24/2009	15.0%	6/1/2009				12/12/2012	5/7/2013	20.0%	8/1/2013	114.2%	488,908
Montana	12/2/2004	35.0%	3/1/2005				4/20/2008	15.0%	7/1/2008	3/20/2009	15.0%	7/1/2009				2/7/2013	2/21/2013	20.0%	6/1/2013	114.2%	112,854
Nebraska	10/12/2004	35.0%	1/1/2005				1/29/2008	15.0%	5/1/2008	2/16/2009	15.0%	5/1/2009				12/12/2012	2/14/2013	20.0%	5/1/2013	114.2%	328,843
Nevada [2]	11/3/2004	35.0%	3/1/2005				12/11/2007	15.0%	4/1/2008	12/17/2008	15.0%	4/1/2009				11/12/2012	12/4/2012	20.0%	4/1/2013	114.2%	87,394
New Hampshire	10/19/2004	35.0%	1/1/2005				1/24/2008	15.0%	4/1/2008	3/9/2009	15.0%	6/1/2009				2/7/2013	10/1/2013	10.0%	1/1/2014	96.4%	104,630
New Jersey [2]	11/3/2004	35.0%	3/1/2005				12/11/2007	15.0%	4/1/2008	12/17/2008	15.0%	4/1/2009				11/12/2012	12/4/2012	20.0%	4/1/2013	114.2%	411,690
New Mexico	10/25/2004	35.0%	1/1/2005				1/14/2008	15.0%	4/1/2008	9/8/2009	15.0%	1/1/2010				8/14/2013	10/7/2013	15.0%	1/1/2014	105.3%	27,975
North Carolina	3/21/2005	35.0%	6/1/2005				1/18/2008	15.0%	4/1/2008	3/23/2009	9.5%	6/1/2009	4/11/2011	5.0%	7/1/2011	11/20/2012	6/26/2013	20.0%	10/1/2013	114.2%	348,931
North Dakota	11/16/2004	20.0%	2/1/2005	10/11/2006	12.5%	5/1/2007	3/31/2008	15.0%	7/1/2008	2/6/2009	15.0%	7/1/2009				1/29/2013	3/20/2013	15.0%	7/1/2013	105.3%	116,548
Ohio	9/2/2004	35.0%	1/1/2005				1/7/2008	15.0%	4/1/2008	1/16/2009	15.0%	4/1/2009				12/3/2012				78.5%	1,285,520
Oklahoma	11/16/2004	35.0%	2/1/2005				1/10/2008	15.0%	4/1/2008	12/22/2008	15.0%	4/1/2009				7/23/2013	9/16/2013	20.0%	12/1/2013	114.2%	120,587
Oregon	7/29/2005	30.0%	10/1/2005	5/17/2007	3.8%	8/1/2007	1/29/2008	15.0%	8/1/2008	3/31/2009	15.0%	8/1/2009				7/17/2013				78.5%	225,864
Pennsylvania	1/20/2005	35.0%	4/1/2005				4/2/2008	15.0%	7/1/2008	6/24/2009	10.0%	9/1/2009	3/21/2011	4.5%	6/1/2011	2/13/2013	5/8/2013	15.0%	8/1/2013	105.3%	1,312,139
Rhode Island	4/5/2005	35.0%	7/1/2005				4/28/2008	15.0%	8/1/2008	10/21/2009	15.0%	1/1/2010				6/6/2013				78.5%	107,368
South Carolina	10/21/2004	35.0%	1/1/2005				5/12/2008	15.0%	8/1/2008	4/8/2009	15.0%	8/1/2009				12/13/2012	3/22/2013	20.0%	7/1/2013	114.2%	254,915
South Dakota	12/21/2004	35.0%	3/1/2005				12/26/2007	15.0%	4/1/2008	12/31/2008	15.0%	4/1/2009				11/28/2012	1/28/2013	20.0%	5/1/2013	114.2%	402,086
Tennessee	11/17/2004	35.0%	2/1/2005				1/18/2008	15.0%	4/1/2008	1/16/2009	15.0%	4/1/2009				2/7/2013	4/8/2013	20.0%	7/1/2013	114.2%	359,614
Texas	11/22/2004	35.0%	2/1/2005				3/6/2008	15.0%	6/1/2008	10/23/2009	14.0%	1/1/2010				7/1/2013	9/19/2013	10.0%	1/1/2014	94.7%	595,204
Utah	1/10/2005	35.0%	5/1/2005				2/13/2008	15.0%	5/1/2008	7/12/2009	15.0%	10/1/2009				6/13/2013	10/7/2013	20.0%	2/1/2014	114.2%	58,048
Vermont	12/8/2005	35.0%	3/1/2006				4/4/2008	15.0%	7/1/2008	Not Yet Submitted										55.3%	20,331
Virginia	11/16/2005	29.0%	3/1/2006				3/25/2009	15.0%	6/1/2009	11/26/2011	20.3%	3/1/2012				8/1/2013				78.5%	540,213
Washington	10/18/2004	30.0%	1/1/2005	11/22/2006	3.8%	5/1/2007	7/16/2008	15.0%	10/1/2008	11/23/2009	15.0%	3/1/2010				6/19/2013	10/23/2013	20.0%	2/1/2014	114.2%	424,856
West Virginia	11/22/2004	35.0%	2/1/2005				1/31/2008	15.0%	5/1/2008	1/13/2009	15.0%	5/1/2009				5/24/2013	7/15/2013	20.0%	10/1/2013	114.2%	123,753
Wisconsin	1/24/2005	35.0%	4/1/2005				7/14/2008	15.0%	10/1/2008	5/11/2009	15.0%	10/1/2009				12/10/2012	2/6/2013	20.0%	5/1/2013	114.2%	514,247
Wyoming	8/11/2004	35.0%	1/1/2005				12/6/2007	15.0%	4/1/2008	12/30/2008	15.0%	4/1/2009				6/6/2013	6/13/2013	20.0%	9/1/2013	114.2%	45,319

[1] *Alaska does not require long term care rates to be filed before use.*
[2] *Group policies, submitted and filed in Alabama where trustee is located.*

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 30240
With No Increase

1	Present Value of Future Incurred Claims:	410,750,639
2	3/31/2013 Statutory Active Life Reserves:	340,023,692
3	Present Value of Future Premiums:	91,069,932
	Anticipated Loss Ratio = (1 - 2) / 3	**77.7%**

Policy Form 30240
With 20% Increase

1	Present Value of Future Incurred Claims:	404,726,037
2	3/31/2013 Statutory Active Life Reserves:	340,023,692
3	Present Value of Future Premiums:	102,888,267
	Anticipated Loss Ratio = (1 - 2) / 3	**62.9%**

Virginia Experience
Using Actual History

Policy Forms 30240-VA and 30240-VA1
With No Increase

1	Present Value of Future Incurred Claims:	12,505,587
2	3/31/2013 Statutory Active Life Reserves:	10,283,838
3	Present Value of Future Premiums:	2,650,163
	Anticipated Loss Ratio = (1 - 2) / 3	**83.8%**

Policy Forms 30240-VA and 30240-VA1
With 20% Increase

1	Present Value of Future Incurred Claims:	12,321,651
2	3/31/2013 Statutory Active Life Reserves:	10,283,838
3	Present Value of Future Premiums:	2,995,631
	Anticipated Loss Ratio = (1 - 2) / 3	**68.0%**

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

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-129009929
Policy Forms: Nursing Home Indemnity Policy 30240-VA and 30240-VA1

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. *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 received a policyholder notification letter approximately 60 days prior to the effective date of the increase, explaining the premium rate increase and several alternative

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

RiverSource Insurance

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 their nursing home daily benefit amount;
2. Reduce the coverage on their optional home care rider, if applicable;
3. Increase their elimination periods;
4. Decrease their benefit periods; and
5. Eliminate their inflation riders.

If the policyholder chooses to change the daily benefit amount on the base nursing home policy, if applicable, the new daily benefit amount is calculated by multiplying the current nursing home daily benefit amount by the ratio of the current premium on the nursing home portion of the policy 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 optional home care rider (if applicable), 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 these policy forms when originally approved (May 31, 1989 for policy form 30240-VA and February 28, 1992 for policy form 30240-VA1).

2. *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.

3. *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*

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Minneapolis, MN 55474

RiverSource Insurance

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 these policy forms 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."

4. *Since the Company is relying on the nationwide experience to support the need for the rate increase, the earned premiums in all exhibits containing nationwide projections need to be restated to the premiums which would have been collected had all policies been issued in Virginia. This calculation does not have to be done on a seriatim basis, but can be estimated based on the ratio of the weighted average rate increase percentage approved and implemented across all states vs. the increases implemented in Virginia. Adjustments should be made for each year since the first rate increases were implemented in 2005 and also apply to projected future premiums.*

   As described in Section 15 of the Actuarial Memorandum, the actual and projected premiums for nationwide experience shown in Exhibits IX and XI have been assumes that the prior rate increases approved in Virginia in 2005, 2009 and 2011 have been approved in all states, regardless of actual experience for the state.

5. *Please confirm the Overall Percentage Indicated Change under the Company Rate Information on the Rate/Rule Schedule of 1144.10% is correct.*

   The Overall Percentage change of 1114.1% is correct and is the rate increase that would be required to produce a lifetime loss ratio of 60%.

6. *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)."

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Minneapolis, MN 55474

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.

Respectfully,

Anju Gupta-Lavey

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

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

RiverSource Life Insurance Company
70100 Ameriprise Financial Center
Minneapolis, MN 55474
riversource.com

RiverSource

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 21st 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

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

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

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 $<ALTDBAMT>, 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

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)

SAMPLE

RiverSource Life Insurance Company 70100 Ameriprise Financial Center Minneapolis, MN 55474

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

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

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291524-VA

Reset Form

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

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

SERFF Tracking Number: AERS-129009929

Effective Date: Upon approval

(Projected) Number of Insureds Affected: 439

New Rates

Average Annual Premium Per Member:

Revised Rates

Average Annual Premium Per Member: $1,476

Average Requested Percentage Rate Change Per Member: 20%

Minimum Requested Percentage Rate Change Per Member: 20%

Maximum Requested Percentage Rate Change Per Member: 20%

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

Form#	"Product Name"(if applicable)
30240-VA 30240-VA1	

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

Premium rates are being raised on all policies issued under these policy forms 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.

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

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-129009929
Policy Forms: Nursing Home Indemnity Policy 30240-VA and 30240-VA1

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 bother 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.

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

RiverSource Insurance

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.

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

RiverSource Insurance

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 20% 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 20% 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.

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

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.

Respectfully,

Anju Gupta-Lavey

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

Reset Form

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

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

SERFF Tracking Number: AERS-129009929

Effective Date: Upon approval

(Projected) Number of Insureds Affected: 439

New Rates

Average Annual Premium Per Member:

Revised Rates

Average Annual Premium Per Member: $1,476

Average Requested Percentage Rate Change Per Member: 20%

Minimum Requested Percentage Rate Change Per Member: 20%

Maximum Requested Percentage Rate Change Per Member: 20%

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

Form#	"Product Name"(if applicable)
30240-VA 30240-VA1	

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

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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SAMPLE

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

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 $<ALTDBAMT>, 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

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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SAMPLE

RiverSource Life Insurance Company 70100 Ameriprise Financial Center Minneapolis, MN 55474

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

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

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291524-VA

RiverSource Life Insurance Company
70100 Ameriprise Financial Center
Minneapolis, MN 55474
riversource.com

RiverSource

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 21st 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: *LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*
Product Name: *Long Term Care*
Project Name/Number: *30240 2013/30240 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_30240_20140219.pdf (Superceded)
05/01/2013		Rate	VA ExhibitXIV Premiums 30240	05/30/2014	VA ExhXIV_Premiums_30240_20130801.pdf (Superceded)
05/01/2013	Withdrawn 12/03/2014	Supporting Document	L&H Actuarial Memorandum	02/19/2014	VA ActMem_30240_20130801.pdf (Superceded)

RIVERSOURCE LIFE INSURANCE COMPANY

Address: 227 Ameriprise Financial Center, Minneapolis MN 55474

Actuarial Memorandum for 30240 Series

February 2014

Policy forms 30240-VA and 30240-VA1 are individual policy forms providing benefits to individuals for confinement in a nursing home. These forms were issued in Virginia from August 15, 1989 to May 15, 1993.

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

These are individually underwritten policy forms which pay a daily benefit for confinement in a nursing home. The payments commence after an elimination period of 20 or 100 days depending on the plan chosen. No prior hospitalization is required.

After discharge from the nursing home, a post confinement benefit is also payable for up to as many days as nursing home benefits were received. The amount paid will be equal to the following percentage of the daily benefit paid on the last day of the insured's most recent nursing home stay: 70% for the first 30 days, 60% for the next 30 days, and 50% for each day thereafter. The absolute maximum benefit period for both the nursing home benefit and the post confinement benefit is 2, 3, or 4 years, or unlimited, again depending on the plan chosen at issue. Premiums which become due during a nursing home stay after benefits have been paid for at least 90 days beyond the elimination period are waived.

Benefit eligibility for nursing home coverage is based on any one of the following: sickness or injury, 3 or more Activities of Daily Living (ADL) deficiencies out of 6 ADLs, or cognitive impairment. As defined in the policy, the 6 ADLs are: Bathing, Dressing, Toileting, Continence, Transferring, and Feeding.

An insured can elect at issue an option that will increase the benefit by a fixed amount (5% of the initial benefit) per year from the second year through the anniversary following the insured's 85th birthday ("Simple BIO") or will increase the previous year's daily benefit by 5% per year from the second year on for life ("Compound BIO"). The benefit will remain level thereafter. The increasing benefit is applicable even if the policy is in claim status. Simple BIO is available in all states, whereas Compound BIO is only available in some states. In Virginia, Simple BIO is available for both forms 30240-VA and 30240-VA1, while the Compound BIO is only available for form 30240-VA1.

3. Renewability

These policy forms are guaranteed renewable for life.

4. Applicability

This filing is applicable to inforce policies only, as these policy forms are no longer being sold in the market. The premium changes will apply to the base forms but not the optional home care rider.

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.

<u>Morbidity</u>
Expected claim costs are the product of original pricing expected claim costs and an actual-to-expected adjustment factor.

Pricing frequencies and severities of claims were originally developed using 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 identifiable for the combinations of elimination periods and maximum benefit limits. This data represented the expected claim costs of the non-increasing benefit nursing home stay. A loading in claim costs was then applied for both the post confinement benefit and waiver of premium benefits. Claim costs for the increasing benefit plan were adjusted appropriately to reflect the 5% annual increase.

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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Actuarial Memorandum for 30240 Series

February 2014

Lifetime Benefit Actual-to-Expected Adjustment Factors

	Age at Issue						
Duration	**<53**	**53–57**	**58–62**	**63–67**	**68–72**	**73–77**	**78+**
1	0.45	0.45	0.80	0.90	1.30	1.70	1.70
2	0.45	0.45	0.85	0.95	1.30	1.70	1.70
3	0.50	0.50	0.85	0.95	1.30	1.70	1.70
4	0.50	0.50	0.90	1.00	1.30	1.70	1.70
5	0.50	0.50	0.90	1.10	1.30	1.70	1.70
6	0.50	0.50	0.90	1.20	1.30	1.35	1.40
7	0.50	0.50	0.95	1.20	1.30	1.35	1.40
8	0.50	0.50	1.00	1.30	1.30	1.35	1.40
9	0.50	0.50	1.05	1.30	1.30	1.35	1.40
10	0.65	0.65	1.10	1.35	1.35	1.35	1.40
11	0.70	0.70	1.15	1.45	1.40	1.35	1.40
12	0.75	0.75	1.20	1.45	1.40	1.35	1.40
13	0.80	0.80	1.25	1.45	1.40	1.35	1.40
14	0.85	0.85	1.30	1.45	1.40	1.35	1.40
15	0.90	0.90	1.35	1.45	1.50	1.35	1.40
16	0.95	0.95	1.40	1.50	1.55	1.35	1.40
17	0.95	1.00	1.45	1.60	1.60	1.35	1.40
18	0.95	1.10	1.50	1.70	1.65	1.35	1.40
19	0.95	1.10	1.50	1.70	1.65	1.35	1.40
20	0.95	1.10	1.50	1.70	1.70	1.35	1.40
21	0.95	1.10	1.50	1.70	1.70	1.35	1.40
22	0.95	1.10	1.50	1.70	1.70	1.35	1.40
23	1.00	1.10	1.50	1.70	1.70	1.35	1.40
24	1.00	1.10	1.50	1.70	1.70	1.35	1.40
25	1.05	1.10	1.50	1.70	1.70	1.40	1.40
26	1.05	1.10	1.50	1.70	1.70	1.40	1.40
27	1.05	1.10	1.50	1.70	1.70	1.40	1.45
28	1.05	1.10	1.50	1.70	1.70	1.45	1.45
29	1.05	1.10	1.50	1.70	1.70	1.45	1.45
30+	1.10	1.10	1.50	1.70	1.70	1.45	1.45

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Actuarial Memorandum for 30240 Series

February 2014

Non-Lifetime Benefit Actual-to-Expected Adjustment Factors

	Age at Issue							
Duration	**<53**	**53–57**	**58–62**	**63–67**	**68–72**	**73–77**	**78-82**	**83+**
1	0.20	0.20	0.25	0.45	0.75	0.80	0.80	1.70
2	0.20	0.20	0.30	0.55	0.75	0.80	1.15	1.70
3	0.20	0.20	0.35	0.55	0.80	0.80	1.25	1.70
4	0.25	0.25	0.45	0.65	0.80	0.95	1.40	1.70
5	0.25	0.25	0.50	0.65	0.80	1.00	1.40	1.70
6	0.30	0.30	0.55	0.70	0.90	1.00	1.40	1.70
7	0.30	0.30	0.55	0.70	0.90	1.00	1.40	1.70
8	0.30	0.30	0.60	0.80	1.00	1.00	1.40	1.70
9	0.35	0.35	0.60	0.80	1.00	1.20	1.40	1.70
10	0.35	0.35	0.65	0.90	1.00	1.20	1.40	1.70
11	0.35	0.35	0.70	0.95	1.20	1.20	1.40	1.65
12	0.35	0.45	0.75	1.00	1.20	1.20	1.40	1.65
13	0.35	0.45	0.80	1.05	1.20	1.25	1.40	1.65
14	0.35	0.50	0.85	1.10	1.20	1.25	1.40	1.65
15	0.35	0.55	0.90	1.15	1.20	1.30	1.40	1.65
16	0.35	0.55	0.90	1.15	1.40	1.30	1.40	1.65
17	0.55	0.65	1.00	1.15	1.40	1.30	1.40	1.65
18	0.55	0.75	1.05	1.15	1.40	1.30	1.40	1.70
19	0.55	0.75	1.05	1.15	1.40	1.30	1.40	1.80
20	0.75	0.75	1.05	1.15	1.40	1.30	1.40	1.80
21	0.75	0.75	1.05	1.15	1.40	1.30	1.40	1.80
22	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
23	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
24	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
25	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
26	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
27	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
28	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
29	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
30	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
31	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
32	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
33	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
34	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
35+	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80

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.

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 99.7%. This experience is based on 8,695 actual claims (5,026 lifetime and 3,669 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 30240, 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.

<u>Mortality</u>
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%.

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). 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. 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 9,255 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

Adverse selection of 2.8% in the year of rate increase notification to policyholders grading down to 0% in the 4th year after rate increase notification is assumed.

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

2005, 2008 and 2009 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 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 these particular policy forms; they do not include any provision for profit or contingencies.

Exhibit VI provides the assumptions used in the 2004 rate increase filing, Exhibit VII provides the assumptions used in the 2008 rate increase filing and Exhibit VIII provides the assumptions used in the 2011 rate increase filing.

6. Marketing Method

These policy forms were marketed by agents of RiverSource Life.

7. Underwriting Description

These policy forms were 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 benefit limit, the initial daily benefit, the elimination period, and the Benefit Increase Option.

9. Issue Age Range

The issue ages are from 50 to 79 except for the benefit structure with 2-year benefit period, 100-day elimination period with no Benefit Increase Option, which is 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):

Premium Mode	Modal Factors	Percent Distribution
Annual	1.0000*AP + 0.0	46.3%
Semi-Annual	0.5020*AP+ 0.4	10.8%
Quarterly	0.2580*AP+ 0.5	8.6%
Monthly	0.0868*AP+ 0.6	34.3%

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 XI and XII.

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 30240 is shown in Exhibit IX, and Virginia experience for policy forms 30240-VA and 30240-VA1 is shown in Exhibit X. Exhibit XI shows nationwide past experience including earned premiums, incurred claims, increase in active life reserves and incurred loss ratios by calendar year, and Exhibit XII 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 to be 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 <u>illustration</u> 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* for 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

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 IX, X, XI and XII 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 IX, X, XI and XII 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 IX and X 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 7.5%, 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 XI and XII 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

Three prior increases have been approved and implemented on these forms. A 29% increase was approved in November 2005 and implemented on each contract's next policy anniversary beginning in March 2006. A 15% increase was approved in March 2009 and implemented on each contract's next policy anniversary beginning in June 2009. A 20.3% 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 X and XII reflect the impact of these increases.

The actual and projected premiums in Exhibits IX and XI reflect the accumulated rate increases as approved in Virginia and implemented from 2006 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 20%.

Projected experience assuming this increase is implemented is shown in Exhibits IX and X. 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 these forms 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 (Nursing Home Annual Premium Based on March 31, 2013 Inforce)

Before increase:	$1,231
After increase:	$1,476

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:

Issue Ages	Percent Distribution
<55	9.0%
55-59	24.5%
60-64	35.5%
65-69	22.6%
70-74	7.3%
75-79	1.0%
>79	0.1%

By Elimination Period:

Elimination Period	Percent Distribution
20-day	32.0%
100-day	68.0%

By Benefit Period:

Benefit Period	Percent Distribution
2-Year	3.6%
3-Year	6.4%
4-Year	22.6%
Unlimited	67.4%

By Inflation Protection Option:

Inflation Option	Percent Distribution
None	38.6%
Simple to Age 85	59.9%
Compound for Life	1.5%

20. Number of Policyholders

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

	Number of Insured	Nursing Home Annual Premium
Virginia	439	$540,213
Nationwide	15,465	$19,032,381

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 standards set forth in 14 VAC 5-200-150(B).

Anju Gupta-Lavey

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 Forms: 30240-VA and 30240-VA1

Original Pricing Assumptions

Mortality: 1983 Individual Annuitant Mortality Table

Lapse Rates:

Duration	Rate
1	11%
2	8%
3	7%
4	6%
5+	5%

Morbidity: Pricing frequencies and severities of claims were originally developed using 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 identifiable for the combinations of elimination periods and maximum benefit limits. This data represented the expected claim costs of the non-increasing benefit nursing home stay. A loading in claim costs was then applied for both the post confinement benefit and waiver of premium benefits. Claim costs for the increasing benefit plan were adjusted appropriately to reflect the 5% annual increase.

The following selection factors were used:

Duration	Factor
1	40%
2	50%
3	60%
4	70%
5	80%
6	90%
7+	100%

Interest Rate: 7.5%

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

Policy Forms: 30240-VA and 30240-VA1

Current Assumptions

Mortality: 1983 Individual Annuitant Mortality Basic Table with selection.

Mortality Selection Factors

	Issue Age Band					
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%	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 Forms: 30240-VA and 30240-VA1

Current Assumptions (continued)

Lapse Rates:

Lifetime Benefit

	Issue Age Band		
Duration	<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%

Non-Lifetime Benefit

	Issue Age Band		
Duration	<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%

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.

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

Policy Forms: 30240-VA and 30240-VA1

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

	Issue Age Band						
Duration	<53	53–57	58–62	63–67	68–72	73–77	78+
1	0.45	0.45	0.80	0.90	1.30	1.70	1.70
2	0.45	0.45	0.85	0.95	1.30	1.70	1.70
3	0.50	0.50	0.85	0.95	1.30	1.70	1.70
4	0.50	0.50	0.90	1.00	1.30	1.70	1.70
5	0.50	0.50	0.90	1.10	1.30	1.70	1.70
6	0.50	0.50	0.90	1.20	1.30	1.35	1.40
7	0.50	0.50	0.95	1.20	1.30	1.35	1.40
8	0.50	0.50	1.00	1.30	1.30	1.35	1.40
9	0.50	0.50	1.05	1.30	1.30	1.35	1.40
10	0.65	0.65	1.10	1.35	1.35	1.35	1.40
11	0.70	0.70	1.15	1.45	1.40	1.35	1.40
12	0.75	0.75	1.20	1.45	1.40	1.35	1.40
13	0.80	0.80	1.25	1.45	1.40	1.35	1.40
14	0.85	0.85	1.30	1.45	1.40	1.35	1.40
15	0.90	0.90	1.35	1.45	1.50	1.35	1.40
16	0.95	0.95	1.40	1.50	1.55	1.35	1.40
17	0.95	1.00	1.45	1.60	1.60	1.35	1.40
18	0.95	1.10	1.50	1.70	1.65	1.35	1.40
19	0.95	1.10	1.50	1.70	1.65	1.35	1.40
20	0.95	1.10	1.50	1.70	1.70	1.35	1.40
21	0.95	1.10	1.50	1.70	1.70	1.35	1.40
22	0.95	1.10	1.50	1.70	1.70	1.35	1.40
23	1.00	1.10	1.50	1.70	1.70	1.35	1.40
24	1.00	1.10	1.50	1.70	1.70	1.35	1.40
25	1.05	1.10	1.50	1.70	1.70	1.40	1.40
26	1.05	1.10	1.50	1.70	1.70	1.40	1.40
27	1.05	1.10	1.50	1.70	1.70	1.40	1.45
28	1.05	1.10	1.50	1.70	1.70	1.45	1.45
29	1.05	1.10	1.50	1.70	1.70	1.45	1.45
30+	1.10	1.10	1.50	1.70	1.70	1.45	1.45

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

Policy Forms: 30240-VA and 30240-VA1

Current Assumptions (continued)

Morbidity (continued):

Non-Lifetime Benefit Actual-to-Expected Adjustment Factors

	Age at Issue							
Duration	<53	53–57	58–62	63–67	68–72	73–77	78-82	83+
1	0.20	0.20	0.25	0.45	0.75	0.80	0.80	1.70
2	0.20	0.20	0.30	0.55	0.75	0.80	1.15	1.70
3	0.20	0.20	0.35	0.55	0.80	0.80	1.25	1.70
4	0.25	0.25	0.45	0.65	0.80	0.95	1.40	1.70
5	0.25	0.25	0.50	0.65	0.80	1.00	1.40	1.70
6	0.30	0.30	0.55	0.70	0.90	1.00	1.40	1.70
7	0.30	0.30	0.55	0.70	0.90	1.00	1.40	1.70
8	0.30	0.30	0.60	0.80	1.00	1.00	1.40	1.70
9	0.35	0.35	0.60	0.80	1.00	1.20	1.40	1.70
10	0.35	0.35	0.65	0.90	1.00	1.20	1.40	1.70
11	0.35	0.35	0.70	0.95	1.20	1.20	1.40	1.65
12	0.35	0.45	0.75	1.00	1.20	1.20	1.40	1.65
13	0.35	0.45	0.80	1.05	1.20	1.25	1.40	1.65
14	0.35	0.50	0.85	1.10	1.20	1.25	1.40	1.65
15	0.35	0.55	0.90	1.15	1.20	1.30	1.40	1.65
16	0.35	0.55	0.90	1.15	1.40	1.30	1.40	1.65
17	0.55	0.65	1.00	1.15	1.40	1.30	1.40	1.65
18	0.55	0.75	1.05	1.15	1.40	1.30	1.40	1.70
19	0.55	0.75	1.05	1.15	1.40	1.30	1.40	1.80
20	0.75	0.75	1.05	1.15	1.40	1.30	1.40	1.80
21	0.75	0.75	1.05	1.15	1.40	1.30	1.40	1.80
22	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
23	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
24	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
25	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
26	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
27	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
28	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
29	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
30	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
31	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
32	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
33	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
34	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
35+	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80

The following adverse selection factors are used:

Year of Policyholder Notification *	Without Current Requested Increase	With Current Requested Increase
1	0.0%	2.8%
2	0.0%	1.8%
3	0.0%	0.8%
4	0.0%	0.0%

* For currently requested increase

Interest Rate: 7.5%

EXHIBIT II
RiverSource Life Insurance Company
Nationwide Nursing Home Claim Experience
For Policy Anniversaries through 2011
Policy Form: 30240
Expected Claims Based on Current Assumptions

SPLIT BY BENEFIT PERIOD AND DURATION									
	Lifetime Benefit Period			Non-Lifetime Benefit Period			All		
Duration	Actual	Expected	A/E	Actual	Expected	A/E	Actual	Expected	A/E
1	789,358	677,271	116.5%	384,639	356,589	107.9%	1,173,997	1,033,860	113.6%
2	2,580,958	2,424,853	106.4%	1,263,462	1,309,491	96.5%	3,844,419	3,734,344	102.9%
3	4,939,263	4,836,165	102.1%	2,432,574	2,498,556	97.4%	7,371,838	7,334,721	100.5%
4	6,348,745	6,849,268	92.7%	4,640,887	3,688,642	125.8%	10,989,632	10,537,909	104.3%
5	7,564,373	8,396,886	90.1%	4,217,664	4,341,175	97.2%	11,782,036	12,738,060	92.5%
6	12,152,822	9,288,847	130.8%	4,530,005	5,180,844	87.4%	16,682,827	14,469,691	115.3%
7	10,444,924	11,684,916	89.4%	6,278,334	6,210,425	101.1%	16,723,258	17,895,341	93.5%
8	12,526,103	13,371,042	93.7%	6,290,152	7,020,112	89.6%	18,816,255	20,391,154	92.3%
9	14,234,562	14,960,346	95.1%	8,747,145	7,942,864	110.1%	22,981,707	22,903,210	100.3%
10	15,356,326	17,137,978	89.6%	6,621,584	8,563,397	77.3%	21,977,910	25,701,375	85.5%
11	19,979,008	19,678,106	101.5%	10,222,945	9,680,309	105.6%	30,201,953	29,358,415	102.9%
12	21,436,840	21,758,653	98.5%	9,602,448	10,259,360	93.6%	31,039,287	32,018,014	96.9%
13	23,873,876	23,636,122	101.0%	10,860,623	10,750,013	101.0%	34,734,499	34,386,136	101.0%
14	23,962,733	25,361,904	94.5%	11,078,848	11,088,453	99.9%	35,041,582	36,450,357	96.1%
15	27,800,789	27,371,470	101.6%	10,896,842	11,546,194	94.4%	38,697,631	38,917,664	99.4%
16	29,302,900	29,900,056	98.0%	11,319,283	12,356,100	91.6%	40,622,183	42,256,155	96.1%
17	30,529,534	32,971,464	92.6%	12,848,376	12,692,559	101.2%	43,377,910	45,664,022	95.0%
18	38,026,549	36,033,543	105.5%	13,858,816	12,922,997	107.2%	51,885,365	48,956,540	106.0%
19	37,363,589	35,117,248	106.4%	11,293,574	11,805,151	95.7%	48,657,163	46,922,399	103.7%
20	27,962,577	27,201,790	102.8%	10,703,221	8,357,522	128.1%	38,665,798	35,559,312	108.7%
21	15,693,682	16,850,558	93.1%	4,976,382	4,802,731	103.6%	20,670,064	21,653,288	95.5%
22	3,516,328	2,738,567	128.4%	1,550,522	854,859	181.4%	5,066,850	3,593,426	141.0%
Total	**386,385,840**	**388,247,051**	**99.5%**	**164,618,324**	**164,228,342**	**100.2%**	**551,004,164**	**552,475,394**	**99.7%**

SPLIT BY ISSUE AGE				
Issue Age	Actual	Expected	A/E	Claim Count
<53	1,038,927	1,497,067	69.4%	15
53-57	12,075,335	12,353,057	97.8%	135
58-62	67,938,593	66,991,688	101.4%	741
63-67	159,844,027	160,179,623	99.8%	2,033
68-72	165,831,688	165,987,063	99.9%	2,661
73-77	102,001,618	103,330,628	98.7%	1,961
78-82	37,747,811	37,519,658	100.6%	970
83+	4,526,165	4,616,611	98.0%	179
Total	**551,004,164**	**552,475,394**	**99.7%**	**8,695**

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

SUMMARY BY DURATION				
Duration	Actual Deaths	Expected Deaths	A/E	Difference
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
Total	**32,715**	**32,779**	**100%**	**(64)**

SUMMARY BY ISSUE AGE				
Issue Age	Actual Deaths	Expected Deaths	A/E	Difference
<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
Total	**32,715**	**32,779**	**100%**	**(64)**

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

EXHIBIT IV
RiverSource Life Insurance Company
Lapses and Benefit Reductions[1]
Nationwide Experience
Experience Includes All Long-Term Care Forms Combined

Additional Lapses Due to Rate Increase									
Increase Percent	Average Increase	Year of Increase							Weighted Average
		2005	2006	2007	2008	2009	2010	2011	
< 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%
Total	16.3%	2.6%	2.5%	1.3%	1.8%	1.9%	1.5%	1.4%	1.9%

Policies Choosing Reduction in Benefits in Relation to Rate Increase Percentage									
Increase Percent	Average Increase	Year of Increase							Weighted Average
		2005	2006	2007	2008	2009	2010	2011	
< 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%
Total	16.3%	1.4%	1.3%	0.8%	0.7%	0.8%	0.7%	0.8%	0.9%

[1] 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																
	Issue Ages 35-62				Issue Ages 63-72				Issue Ages 73+				All Issue Ages			
		Actual		Expected		Actual		Expected		Actual		Expected		Actual		Expected
Duration	Lapses	Exposure	Rate	Lapses	Lapses	Exposure	Rate	Lapses	Lapses	Exposure	Rate	Lapses	Lapses	Exposure	Rate	Lapses
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																
	Issue Ages 35-62				Issue Ages 63-72				Issue Ages 73+				All Issue Ages			
		Actual		Expected		Actual		Expected		Actual		Expected		Actual		Expected
Duration	Lapses	Exposure	Rate	Lapses	Lapses	Exposure	Rate	Lapses	Lapses	Exposure	Rate	Lapses	Lapses	Exposure	Rate	Lapses
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 2004 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2004 Rate Increase Filing Assumptions:

Mortality: 1983 Individual Annuitant Mortality Basic Table with selection.

Mortality Selection Factors

	Issue Age Band		
Duration	<66	63-72	73+
1	20%	20%	20%
2	25%	30%	25%
3	35%	50%	35%
4	55%	50%	40%
5	60%	50%	45%
6	60%	65%	75%
7	60%	65%	75%
8	75%	80%	80%
9	75%	80%	95%
10	75%	85%	95%
11	80%	85%	95%
12	80%	85%	95%
13	85%	90%	100%
14	85%	90%	100%
15	90%	95%	100%
16	90%	95%	100%
17	95%	100%	100%
18	95%	100%	100%
19	95%	100%	100%
20+	100%	100%	100%

EXHIBIT VI
RiverSource Life Insurance Company
Prior 2004 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2004 Rate Increase Filing Assumptions (cont):

Voluntary Lapse Rates:

Lifetime Benefit

	Issue Age Band		
Duration	<63	63-72	73+
1	7.0%	5.5%	3.5%
2	7.0%	5.5%	3.5%
3	5.5%	4.5%	3.5%
4	4.5%	3.0%	2.5%
5	3.0%	2.3%	2.0%
6	2.0%	1.8%	1.8%
7	1.5%	1.3%	1.5%
8	1.2%	1.2%	1.3%
9	1.0%	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%	0.9%	1.3%
17	0.9%	1.0%	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%

Non-Lifetime Benefit

	Issue Age Band		
Duration	<63	63-72	73+
1	6.0%	5.5%	4.0%
2	6.0%	4.5%	4.0%
3	5.0%	3.5%	3.7%
4	3.8%	3.0%	3.3%
5	2.8%	2.5%	2.6%
6	2.2%	2.2%	2.6%
7	1.6%	1.9%	2.6%
8	1.3%	1.5%	2.8%
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%	4.0%
13	1.2%	1.3%	4.0%
14	1.2%	1.3%	4.0%
15	1.2%	1.4%	4.0%
16	1.2%	1.6%	4.0%
17	1.2%	1.8%	4.0%
18	1.2%	2.1%	4.0%
19	1.2%	2.4%	4.0%
20	1.2%	2.7%	4.0%
21	1.2%	3.5%	4.0%
22	1.2%	3.7%	4.0%
23	1.2%	3.8%	4.0%
24	1.2%	3.9%	4.0%
25	1.4%	4.0%	4.0%
26	1.5%	4.0%	4.0%
27	1.6%	4.0%	4.0%
28	1.3%	4.0%	4.0%
29	1.5%	4.0%	4.0%
30	1.8%	4.0%	4.0%
31	2.0%	4.0%	4.0%
32	2.0%	4.0%	4.0%
33+	2.0%	4.0%	4.0%

In the year of rate increase notification to policyholders, an additional 5.0% of inforce policyholders is assumed to lapse.

EXHIBIT VI
RiverSource Life Insurance Company
Prior 2004 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2004 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 (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 2003.

Lifetime Benefit Actual-to-Expected Adjustment Factors

	Issue Age Band					
Duration	<58	58-62	63-67	68-72	73-77	78+
1	0.20	0.28	0.40	0.56	0.60	0.56
2	0.33	0.46	0.65	0.91	0.98	0.91
3	0.35	0.49	0.70	0.98	1.05	0.98
4	0.40	0.56	0.80	1.12	1.20	1.12
5	0.43	0.60	0.85	1.19	1.28	1.19
6	0.45	0.63	0.95	1.17	1.35	1.26
7	0.50	0.80	1.10	1.20	1.50	1.50
8	0.50	0.80	1.15	1.20	1.50	1.50
9	0.50	0.90	1.15	1.20	1.50	1.60
10	0.50	0.90	1.15	1.20	1.50	1.60
11	0.50	1.00	1.15	1.25	1.50	1.65
12	0.60	1.00	1.20	1.30	1.50	1.65
13	0.60	1.00	1.20	1.30	1.50	1.65
14	0.70	1.05	1.20	1.30	1.50	1.65
15	0.70	1.05	1.20	1.30	1.50	1.65
16	0.80	1.05	1.20	1.30	1.50	1.65
17	0.80	1.10	1.20	1.30	1.50	1.65
18	0.90	1.10	1.20	1.30	1.50	1.65
19	0.90	1.10	1.20	1.30	1.50	1.65
20	1.00	1.10	1.20	1.30	1.50	1.65
21	1.00	1.10	1.20	1.30	1.50	1.65
22	1.05	1.10	1.20	1.30	1.50	1.65
23	1.05	1.10	1.20	1.30	1.50	1.65
24	1.10	1.10	1.20	1.30	1.50	1.65
25+	1.10	1.10	1.20	1.30	1.50	1.65

EXHIBIT VI
RiverSource Life Insurance Company
Prior 2004 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2004 Rate Increase Filing Assumptions (cont):

Morbidity (continued): **Non-Lifetime Benefit Actual-to-Expected Adjustment Factors**

	Age at Issue						
Duration	<58	58-62	63-67	68-72	73-77	78-82	83+
1	0.04	0.08	0.20	0.32	0.36	0.56	1.85
2	0.07	0.13	0.33	0.52	0.59	0.91	1.85
3	0.14	0.21	0.35	0.56	0.67	0.98	1.85
4	0.16	0.24	0.40	0.72	0.76	1.16	1.90
5	0.26	0.34	0.43	0.77	0.85	1.23	1.90
6	0.27	0.36	0.45	0.81	0.95	1.31	1.90
7	0.40	0.50	0.60	0.90	1.10	1.45	1.95
8	0.40	0.50	0.60	0.90	1.15	1.45	1.95
9	0.50	0.60	0.70	1.00	1.20	1.45	1.95
10	0.50	0.60	0.70	1.00	1.25	1.50	1.95
11	0.50	0.60	0.70	1.10	1.30	1.50	1.95
12	0.60	0.70	0.80	1.10	1.35	1.50	1.95
13	0.60	0.70	0.80	1.10	1.35	1.50	1.95
14	0.60	0.70	0.80	1.20	1.35	1.50	1.95
15	0.60	0.70	0.90	1.20	1.35	1.50	1.95
16	0.70	0.80	0.90	1.20	1.35	1.50	1.95
17	0.70	0.80	1.00	1.20	1.35	1.50	1.95
18	0.70	0.80	1.00	1.20	1.35	1.50	1.95
19	0.70	0.80	1.00	1.20	1.35	1.50	1.95
20	0.80	0.90	1.00	1.20	1.35	1.50	1.95
21	0.80	0.90	1.00	1.20	1.35	1.50	1.95
22	0.80	0.90	1.00	1.20	1.35	1.50	1.95
23	0.90	0.90	1.00	1.20	1.35	1.50	1.95
24	0.90	0.90	1.00	1.20	1.35	1.50	1.95
25+	0.90	0.90	1.00	1.20	1.35	1.50	1.95

An adverse selection assumption of 5% in the year of the rate increase notification to policyholders grading down to 0% in the 6th year after rate increase notification was also assumed.

Interest Rate: 7.5%

EXHIBIT VII
RiverSource Life Insurance Company
Prior 2008 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2008 Rate Increase Filing Assumptions:

Mortality: 1983 Individual Annuitant Mortality Basic Table with selection.

Mortality Selection Factors

	Issue Age Band				
Duration	<60	60-64	65-69	70-74	75+
1	15%	20%	20%	30%	20%
2	30%	25%	20%	35%	20%
3	40%	45%	45%	40%	35%
4	40%	45%	50%	40%	40%
5	40%	45%	50%	40%	40%
6	50%	55%	60%	70%	75%
7	50%	55%	60%	70%	75%
8	50%	60%	65%	70%	75%
9	75%	75%	80%	85%	80%
10	75%	75%	80%	85%	80%
11	90%	75%	80%	85%	95%
12	90%	85%	90%	90%	100%
13	90%	85%	90%	90%	100%
14	95%	85%	90%	90%	100%
15	100%	85%	90%	100%	100%
16	100%	85%	90%	100%	100%
17	100%	100%	100%	100%	100%
18+	100%	100%	100%	100%	100%

EXHIBIT VII
RiverSource Life Insurance Company
Prior 2008 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2008 Rate Increase Filing Assumptions (cont)

Voluntary Lapse Rates:

Lifetime Benefit

	Issue Age Band		
Duration	<63	63-72	73+
1	7.0%	5.5%	3.5%
2	7.0%	5.5%	3.5%
3	5.5%	4.5%	3.5%
4	4.5%	3.0%	2.5%
5	2.6%	2.1%	2.0%
6	1.5%	1.7%	1.7%
7	1.3%	1.1%	1.3%
8	0.9%	1.1%	1.3%
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%	0.9%	1.3%
17	0.9%	1.0%	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%

Non-Lifetime Benefit

	Issue Age Band		
Duration	<63	63-72	73+
1	6.0%	5.5%	4.0%
2	6.0%	4.5%	4.0%
3	5.0%	3.5%	3.7%
4	3.8%	3.0%	3.3%
5	2.4%	2.0%	2.0%
6	1.8%	1.8%	2.0%
7	1.4%	1.6%	2.6%
8	1.2%	1.3%	2.8%
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%

An additional 2.5% of inforce policyholders was assumed to lapse plus a 2.5% reduction in benefits due to election of reduced benefit options in the year of rate increase notification to policyholders was also assumed.

EXHIBIT VII
RiverSource Life Insurance Company
Prior 2008 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2008 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 (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 December 2006.

Lifetime Benefit Actual-to-Expected Adjustment Factors

	Issue Age Band						
Duration	< 53	53-57	58-62	63-67	68-72	73-77	78+
1	0.50	0.50	0.70	0.85	1.60	1.60	1.40
2	0.50	0.50	0.70	0.85	1.60	1.60	1.40
3	0.50	0.50	0.70	0.85	1.60	1.60	1.40
4	0.50	0.50	0.70	0.85	1.60	1.50	1.40
5	0.50	0.50	0.70	0.85	1.60	1.30	1.40
6	0.50	0.50	0.70	1.10	1.30	1.30	1.65
7	0.50	0.50	0.80	1.15	1.20	1.30	1.65
8	0.50	0.50	0.80	1.25	1.20	1.40	1.65
9	0.50	0.60	0.80	1.25	1.20	1.40	1.65
10	0.50	0.60	0.80	1.25	1.20	1.40	1.45
11	0.50	0.60	1.05	1.25	1.25	1.40	1.45
12	0.60	0.60	1.05	1.25	1.40	1.40	1.45
13	0.60	0.60	1.10	1.25	1.40	1.40	1.45
14	0.60	0.70	1.10	1.20	1.40	1.35	1.45
15	0.60	0.70	1.10	1.20	1.40	1.35	1.45
16	0.60	0.85	1.10	1.20	1.40	1.35	1.45
17	0.60	0.85	1.10	1.20	1.40	1.35	1.45
18	0.60	0.95	1.10	1.20	1.30	1.35	1.45
19	0.70	0.95	1.10	1.20	1.30	1.35	1.45
20	0.70	1.10	1.10	1.20	1.30	1.35	1.45
21	0.85	1.10	1.10	1.20	1.30	1.35	1.45
22	0.85	1.10	1.10	1.20	1.30	1.35	1.45
23	0.95	1.10	1.10	1.20	1.30	1.35	1.45
24	0.95	1.10	1.10	1.20	1.30	1.35	1.45
25+	1.10	1.10	1.10	1.20	1.30	1.35	1.45

EXHIBIT VII
RiverSource Life Insurance Company
Prior 2008 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2008 Rate Increase Filing Assumptions (cont)

Morbidity (continued): **Non-Lifetime Benefit Actual-to-Expected Adjustment Factors**

	Age at Issue							
Duration	< 53	53–57	58–62	63–67	68–72	73–77	78–82	83+
1	0.10	0.10	0.20	0.50	0.80	0.90	1.40	1.80
2	0.10	0.10	0.20	0.50	0.80	0.90	1.40	1.80
3	0.20	0.20	0.30	0.50	0.80	0.95	1.40	1.80
4	0.20	0.20	0.30	0.50	0.90	0.95	1.45	1.80
5	0.30	0.30	0.40	0.50	0.90	1.00	1.45	1.80
6	0.30	0.30	0.40	0.50	0.90	1.05	1.45	1.80
7	0.40	0.40	0.50	0.60	0.90	1.10	1.45	1.55
8	0.40	0.40	0.50	0.60	0.90	1.15	1.45	1.55
9	0.50	0.50	0.60	0.70	1.00	1.20	1.45	1.55
10	0.50	0.50	0.60	0.70	1.00	1.25	1.50	1.55
11	0.50	0.50	0.60	0.70	1.10	1.30	1.50	1.55
12	0.50	0.60	0.70	0.80	1.10	1.35	1.50	1.55
13	0.50	0.60	0.70	0.80	1.10	1.35	1.50	1.55
14	0.50	0.60	0.70	0.80	1.20	1.35	1.50	1.55
15	0.50	0.60	0.70	0.90	1.20	1.35	1.50	1.55
16	0.50	0.60	0.70	0.90	1.20	1.35	1.50	1.55
17	0.60	0.70	0.80	1.00	1.20	1.35	1.50	1.55
18	0.60	0.70	0.80	1.00	1.20	1.35	1.50	1.55
19	0.60	0.70	0.80	1.00	1.20	1.35	1.50	1.55
20	0.60	0.70	0.90	1.00	1.20	1.35	1.50	1.55
21	0.60	0.70	0.90	1.00	1.20	1.35	1.50	1.55
22	0.70	0.80	0.90	1.00	1.20	1.35	1.50	1.55
23	0.70	0.80	0.90	1.00	1.20	1.35	1.50	1.55
24	0.70	0.80	0.90	1.00	1.20	1.35	1.50	1.55
25	0.70	0.90	0.90	1.00	1.20	1.35	1.50	1.55
26	0.70	0.90	0.90	1.00	1.20	1.35	1.50	1.55
27+	0.80	0.90	0.90	1.00	1.20	1.35	1.50	1.55

An adverse selection assumption of 5% in the year of the rate increase notification to policyholders grading down to 0% in the 6th year after rate increase notification was also assumed.

Interest Rate: 4.5%

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Form: 30240-VA and 30240-VA1

Prior 2011 Rate Increase Filing Assumptions:

Mortality: 1983 Individual Annuitant Mortality Basic Table with selection.

Mortality Selection Factors

	Issue Age Band					
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 VIII
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Form: 30240-VA and 30240-VA1

Prior 2011 Rate Increase Filing Assumptions (cont):

Voluntary Lapse Rates:

Lifetime Benefit

	Issue Age Band		
Duration	<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%

Non-Lifetime Benefit

	Issue Age Band		
Duration	<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%

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.

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Form: 30240-VA and 30240-VA1

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

	Issue Age Band							
Duration	<48	48-52	53–57	58–62	63–67	68–72	73–77	78+
1	0.45	0.45	0.40	0.80	0.80	1.50	1.80	1.50
2	0.28	0.45	0.40	0.80	0.80	1.50	1.80	1.50
3	0.26	0.45	0.40	0.80	0.80	1.50	1.80	1.50
4	0.23	0.45	0.40	0.80	0.80	1.50	1.80	1.50
5	0.21	0.45	0.40	0.80	0.80	1.50	1.80	1.50
6	0.20	0.45	0.40	0.80	1.00	1.50	1.80	1.50
7	0.29	0.45	0.40	0.80	1.00	1.15	1.30	1.80
8	0.32	0.45	0.40	0.80	1.35	1.15	1.30	1.80
9	0.36	0.45	0.40	0.90	1.35	1.15	1.30	1.35
10	0.38	0.45	0.75	0.90	1.35	1.15	1.30	1.35
11	0.41	0.45	0.75	0.90	1.35	1.35	1.30	1.35
12	0.45	0.45	0.75	0.90	1.35	1.40	1.30	1.50
13	0.45	0.45	0.75	1.10	1.35	1.40	1.30	1.55
14	0.45	0.45	0.75	1.20	1.35	1.40	1.30	1.55
15	0.45	0.45	0.75	1.40	1.35	1.55	1.30	1.55
16	0.45	0.45	0.75	1.40	1.35	1.55	1.30	1.55
17	0.45	0.50	0.80	1.40	1.50	1.55	1.40	1.55
18	0.45	0.60	1.15	1.40	1.50	1.55	1.40	1.55
19	0.45	0.70	1.15	1.40	1.50	1.55	1.45	1.55
20	0.45	0.70	1.15	1.40	1.50	1.55	1.45	1.55
21	0.45	0.85	1.15	1.40	1.50	1.55	1.45	1.55
22	0.50	0.85	1.15	1.40	1.50	1.55	1.45	1.55
23	0.60	0.95	1.15	1.40	1.50	1.55	1.45	1.55
24	0.70	0.95	1.15	1.40	1.50	1.55	1.45	1.55
25	0.70	1.00	1.15	1.40	1.50	1.55	1.45	1.55
26	0.85	1.00	1.15	1.40	1.50	1.55	1.45	1.55
27	0.85	1.10	1.15	1.40	1.50	1.55	1.45	1.55
28	0.95	1.10	1.15	1.40	1.50	1.55	1.45	1.55
29	0.95	1.10	1.15	1.40	1.50	1.55	1.45	1.55
30	1.00	1.10	1.15	1.40	1.50	1.55	1.45	1.55
31	1.00	1.10	1.15	1.40	1.50	1.55	1.45	1.55
32+	1.10	1.10	1.15	1.40	1.50	1.55	1.45	1.55

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Form: 30240-VA and 30240-VA1

Prior 2011 Rate Increase Filing Assumptions (cont):

Morbidity (continued):

Non-Lifetime Benefit Actual-to-Expected Adjustment Factors

	Age at Issue								
Duration	**<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	0.30	0.75	0.85	1.40	1.80
2	0.06	0.10	0.10	0.20	0.30	0.75	0.85	1.40	1.80
3	0.06	0.10	0.10	0.20	0.30	0.75	0.85	1.40	1.80
4	0.05	0.10	0.10	0.30	0.50	0.85	0.95	1.40	1.80
5	0.05	0.20	0.20	0.30	0.50	0.85	0.95	1.40	1.80
6	0.04	0.20	0.20	0.50	0.50	0.85	0.95	1.40	1.80
7	0.07	0.20	0.20	0.60	0.50	0.85	0.95	1.40	1.70
8	0.07	0.20	0.20	0.60	0.50	0.85	1.00	1.40	1.70
9	0.08	0.30	0.30	0.60	0.65	0.85	1.25	1.40	1.55
10	0.17	0.30	0.30	0.60	0.65	0.85	1.25	1.40	1.55
11	0.18	0.30	0.40	0.60	0.65	1.10	1.25	1.40	1.55
12	0.20	0.30	0.40	0.60	1.00	1.10	1.25	1.40	1.55
13	0.20	0.30	0.50	0.60	1.10	1.10	1.25	1.40	1.55
14	0.30	0.40	0.50	0.85	1.10	1.10	1.25	1.40	1.55
15	0.30	0.40	0.50	0.85	1.10	1.20	1.25	1.40	1.55
16	0.30	0.40	0.50	0.85	1.10	1.40	1.25	1.45	1.55
17	0.30	0.60	0.60	0.85	1.10	1.40	1.30	1.50	1.55
18	0.30	0.60	0.70	1.00	1.10	1.40	1.30	1.50	1.55
19	0.40	0.60	0.70	1.00	1.10	1.40	1.30	1.50	1.55
20	0.40	0.60	0.70	1.00	1.10	1.40	1.30	1.50	1.55
21	0.40	0.60	0.70	1.00	1.10	1.40	1.30	1.50	1.55
22	0.60	0.60	0.80	1.00	1.10	1.40	1.30	1.50	1.55
23	0.60	0.70	0.80	1.00	1.10	1.40	1.30	1.50	1.55
24	0.60	0.70	0.80	1.00	1.10	1.40	1.30	1.50	1.55
25	0.60	0.70	0.90	1.00	1.10	1.40	1.30	1.50	1.55
26	0.60	0.70	0.90	1.00	1.10	1.40	1.30	1.50	1.55
27	0.60	0.80	0.90	1.00	1.10	1.40	1.30	1.50	1.55
28	0.70	0.80	0.90	1.00	1.10	1.40	1.30	1.50	1.55
29	0.70	0.80	0.90	1.00	1.10	1.40	1.30	1.50	1.55
30	0.70	0.90	0.90	1.00	1.10	1.40	1.30	1.50	1.55
31	0.70	0.90	1.00	1.00	1.10	1.40	1.30	1.50	1.55
32	0.80	0.90	1.00	1.00	1.10	1.40	1.30	1.50	1.55
33	0.80	0.95	1.00	1.00	1.10	1.40	1.30	1.50	1.55
34	0.80	0.95	1.00	1.00	1.10	1.40	1.30	1.50	1.55
35	0.90	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
36	0.90	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
37	0.90	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
38	0.95	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
39	0.95	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
40+	1.00	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55

The following adverse selection factors are used:

Year of Policyholder Notification *	Without Current Requested Increase	With Current Requested Increase
1	0.0%	2.8%
2	0.0%	1.8%
3	0.0%	0.8%
4	0.0%	0.0%

* For currently requested increase

Interest Rate: 7.5%

EXHIBIT IX
RiverSource Life Insurance Company
Nationwide Experience Projections with No Increase
Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis
Policy Form: 30240

			Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest						
	Calendar Year	Ending Policies Inforce	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
Historical Experience	1989	3,532	477,819	0	0	0.0%	0.0%	2,662,038	0	0	0.0%	0.0%	7.50%	5.5712
	1990	20,231	11,323,037	1,232	1,155	0.0%	0.0%	58,682,081	6,383	5,984	0.0%	0.0%	7.50%	5.1825
	1991	33,057	23,730,033	1,944	3,294,975	0.0%	13.9%	114,401,690	9,371	15,884,962	0.0%	13.9%	7.50%	4.8210
	1992	44,591	34,448,430	1,690,119	6,171,474	4.9%	17.9%	154,488,113	7,579,543	27,676,713	4.9%	17.9%	7.50%	4.4846
	1993	45,706	40,970,649	3,222,626	8,891,377	7.9%	21.7%	170,918,871	13,443,955	37,092,508	7.9%	21.7%	7.50%	4.1717
	1994	43,660	39,420,810	5,892,071	9,855,045	14.9%	25.0%	152,979,856	22,865,288	38,244,354	14.9%	25.0%	7.50%	3.8807
	1995	41,935	37,637,454	7,837,584	11,266,955	20.8%	29.9%	135,869,031	28,293,224	40,673,056	20.8%	29.9%	7.50%	3.6099
	1996	40,338	36,134,012	10,249,636	15,624,614	28.4%	43.2%	121,341,110	34,419,158	52,468,792	28.4%	43.2%	7.50%	3.3581
	1997	38,927	34,589,007	13,065,641	17,780,628	37.8%	51.4%	108,049,164	40,814,459	55,543,137	37.8%	51.4%	7.50%	3.1238
	1998	37,079	33,122,919	15,916,595	19,443,305	48.1%	58.7%	96,250,601	46,251,415	56,499,544	48.1%	58.7%	7.50%	2.9059
	1999	35,367	31,290,387	18,384,152	22,760,137	58.8%	72.7%	84,581,877	49,694,690	61,523,530	58.8%	72.7%	7.50%	2.7031
	2000	33,954	29,843,654	21,429,396	26,669,331	71.8%	89.4%	75,042,952	53,884,995	67,061,002	71.8%	89.4%	7.50%	2.5145
	2001	32,530	28,399,995	25,397,653	26,494,505	89.4%	93.3%	66,430,531	59,407,740	61,973,391	89.4%	93.3%	7.50%	2.3391
	2002	31,025	26,899,593	27,614,437	30,544,425	102.7%	113.5%	58,531,102	60,086,539	66,461,930	102.7%	113.5%	7.50%	2.1759
	2003	29,613	25,356,832	30,295,561	33,084,721	119.5%	130.5%	51,324,830	61,321,325	66,966,870	119.5%	130.5%	7.50%	2.0241
	2004	28,223	23,927,805	34,061,195	38,627,557	142.3%	161.4%	45,053,332	64,133,353	72,731,292	142.3%	161.4%	7.50%	1.8829
	2005	26,280	21,567,058	37,788,114	41,667,455	175.2%	193.2%	37,775,177	66,186,713	72,981,464	175.2%	193.2%	7.50%	1.7515
	2006	24,689	21,676,207	39,456,399	40,389,114	182.0%	186.3%	35,317,538	64,287,211	65,806,904	182.0%	186.3%	7.50%	1.6293
	2007	23,248	23,466,443	42,827,475	46,146,562	182.5%	196.6%	35,566,894	64,911,425	69,941,995	182.5%	196.6%	7.50%	1.5156
	2008	21,729	21,827,751	46,609,785	52,689,538	213.5%	241.4%	30,775,080	65,715,423	74,287,304	213.5%	241.4%	7.50%	1.4099
	2009	20,116	20,383,511	53,209,364	54,558,958	261.0%	267.7%	26,733,802	69,786,241	71,556,288	261.0%	267.7%	7.50%	1.3115
	2010	18,627	20,581,446	59,151,098	53,964,474	287.4%	262.2%	25,110,141	72,166,573	65,838,696	287.4%	262.2%	7.50%	1.2200
	2011	17,139	18,860,305	61,386,135	56,695,958	325.5%	300.6%	21,404,916	69,668,282	64,345,312	325.5%	300.6%	7.50%	1.1349
	2012	15,757	18,216,181	62,949,458	55,888,139	345.6%	306.8%	19,231,523	66,458,165	59,003,259	345.6%	306.8%	7.50%	1.0557
	1/2013-3/2013	15,465	4,673,528	16,085,355	17,202,549	344.2%	368.1%	4,715,969	16,231,428	17,358,767	344.2%	368.1%	7.50%	1.0091
Projected Future Experience	4/2013-12/2013	14,382	13,692,096	43,599,017	41,974,539	318.4%	306.6%	13,325,753	42,432,490	40,851,477	318.4%	306.6%	7.50%	0.9732
	2014	13,051	16,584,185	50,237,740	55,154,576	302.9%	332.6%	15,150,730	45,895,438	50,387,286	302.9%	332.6%	7.50%	0.9136
	2015	11,762	14,759,253	54,470,277	53,734,057	369.1%	364.1%	12,542,824	46,290,358	45,664,698	369.1%	364.1%	7.50%	0.8498
	2016	10,527	13,040,884	57,950,925	51,992,724	444.4%	398.7%	10,309,308	45,812,381	41,102,200	444.4%	398.7%	7.50%	0.7905
	2017	9,356	11,439,781	59,162,693	50,058,092	517.2%	437.6%	8,412,629	43,507,282	36,811,907	517.2%	437.6%	7.50%	0.7354
	2018	8,257	9,964,014	58,414,409	47,693,497	586.3%	478.7%	6,816,162	39,960,006	32,626,067	586.3%	478.7%	7.50%	0.6841
	2019	7,231	8,614,732	57,125,955	44,945,532	663.1%	521.7%	5,481,998	36,352,189	28,601,158	663.1%	521.7%	7.50%	0.6364
	2020	6,280	7,388,384	55,337,391	41,860,742	749.0%	566.6%	4,373,590	32,757,241	24,779,672	749.0%	566.6%	7.50%	0.5920
	2021	5,408	6,284,625	52,963,625	38,490,461	842.7%	612.5%	3,460,665	29,164,724	21,194,993	842.7%	612.5%	7.50%	0.5507
	2022	4,616	5,300,335	50,000,963	34,946,842	943.4%	659.3%	2,715,032	25,612,388	17,901,097	943.4%	659.3%	7.50%	0.5122
	2023	3,906	4,432,233	46,585,559	31,336,583	1051.1%	707.0%	2,111,961	22,198,036	14,931,893	1051.1%	707.0%	7.50%	0.4765
	2024	3,275	3,674,051	42,819,885	27,704,183	1165.5%	754.1%	1,628,546	18,980,178	12,280,050	1165.5%	754.1%	7.50%	0.4433
	2025	2,719	3,018,345	38,816,254	24,191,165	1286.0%	801.5%	1,244,558	16,005,157	9,974,775	1286.0%	801.5%	7.50%	0.4123
	2026	2,236	2,456,701	34,803,182	20,863,831	1416.7%	849.3%	942,302	13,349,248	8,002,615	1416.7%	849.3%	7.50%	0.3836
	2027	1,819	1,979,794	31,055,019	17,768,193	1568.6%	897.5%	706,398	11,080,547	6,339,758	1568.6%	897.5%	7.50%	0.3568
	2028	1,464	1,579,736	27,405,850	14,940,896	1734.8%	945.8%	524,331	9,096,288	4,959,039	1734.8%	945.8%	7.50%	0.3319
	2029	1,167	1,248,081	23,916,748	12,401,713	1916.3%	993.7%	385,350	7,384,389	3,829,077	1916.3%	993.7%	7.50%	0.3088
	2030	919	975,989	20,639,011	10,155,325	2114.7%	1040.5%	280,317	5,927,791	2,916,741	2114.7%	1040.5%	7.50%	0.2872
	2031	716	755,097	17,609,542	8,195,896	2332.1%	1085.4%	201,743	4,704,826	2,189,737	2332.1%	1085.4%	7.50%	0.2672
	2032	551	577,714	14,851,149	6,509,114	2570.7%	1126.7%	143,582	3,691,026	1,617,741	2570.7%	1126.7%	7.50%	0.2485
	2033	419	436,875	12,374,966	5,082,372	2832.6%	1163.3%	101,003	2,861,031	1,175,019	2832.6%	1163.3%	7.50%	0.2312
	2034	314	326,361	10,183,807	3,899,540	3120.4%	1194.9%	70,189	2,190,183	838,655	3120.4%	1194.9%	7.50%	0.2151
	2035	232	240,704	8,274,423	2,940,554	3437.6%	1221.6%	48,155	1,655,386	588,289	3437.6%	1221.6%	7.50%	0.2001
	2036	169	175,159	6,636,015	2,178,904	3788.6%	1244.0%	32,598	1,234,982	405,500	3788.6%	1244.0%	7.50%	0.1861
	2037	122	125,672	5,252,532	1,589,763	4179.6%	1265.0%	21,756	909,313	275,218	4179.6%	1265.0%	7.50%	0.1731
	2038	86	88,829	4,103,344	1,141,973	4619.4%	1285.6%	14,305	660,806	183,904	4619.4%	1285.6%	7.50%	0.1610
	2039	60	61,797	3,163,733	806,890	5119.6%	1305.7%	9,257	473,945	120,877	5119.6%	1305.7%	7.50%	0.1498
	2040	41	42,265	2,407,108	560,161	5695.3%	1325.4%	5,890	335,440	78,061	5695.3%	1325.4%	7.50%	0.1394
	2041	27	28,377	1,806,844	381,525	6367.3%	1344.5%	3,679	234,224	49,458	6367.3%	1344.5%	7.50%	0.1296
	2042	18	18,670	1,337,628	254,480	7164.5%	1363.0%	2,251	161,301	30,687	7164.5%	1363.0%	7.50%	0.1206
	2043	11	12,010	976,290	165,848	8129.0%	1380.9%	1,347	109,515	18,604	8129.0%	1380.9%	7.50%	0.1122
	2044	7	7,532	702,227	105,309	9322.7%	1398.1%	786	73,276	10,989	9322.7%	1398.1%	7.50%	0.1043
	2045	4	4,590	497,562	64,925	10839.2%	1414.4%	446	48,297	6,302	10839.2%	1414.4%	7.50%	0.0971
	2046	2	2,707	347,117	38,698	12823.6%	1429.6%	244	31,343	3,494	12823.6%	1429.6%	7.50%	0.0903
	2047	1	1,537	238,296	22,184	15508.3%	1443.7%	129	20,016	1,863	15508.3%	1443.7%	7.50%	0.0840
	2048	1	834	160,869	12,151	19281.5%	1456.4%	65	12,570	949	19281.5%	1456.4%	7.50%	0.0781
	2049	0	430	106,703	6,309	24821.9%	1467.6%	31	7,756	459	24821.9%	1467.6%	7.50%	0.0727
	2050	0	208	69,467	3,073	33388.3%	1477.1%	14	4,697	208	33388.3%	1477.1%	7.50%	0.0676
	2051	0	93	44,339	1,387	47480.6%	1484.7%	6	2,789	87	47480.6%	1484.7%	7.50%	0.0629
	2052	0	38	27,711	570	72511.6%	1490.4%	2	1,621	33	72511.6%	1490.4%	7.50%	0.0585
	Past		628,824,867	634,523,026	689,712,948	100.9%	109.7%	1,733,238,220	1,097,622,897	1,281,927,053	63.3%	74.0%		
	Future		129,340,717	896,476,174	654,174,577	693.1%	505.8%	91,069,932	511,230,475	410,750,639	561.4%	451.0%		
	Lifetime		758,165,584	1,530,999,201	1,343,887,525	201.9%	177.3%	1,824,308,152	1,608,853,373	1,692,677,693	88.2%	92.8%		

EXHIBIT IX
RiverSource Life Insurance Company
Nationwide Experience Projections with 20% Increase
Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis
Policy Form: 30240

			Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest						
	Calendar Year	Ending Policies Inforce	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
Historical Experience	1989	3,532	477,819	0	0	0.0%	0.0%	2,662,038	0	0	0.0%	0.0%	7.50%	5.5712
	1990	20,231	11,323,037	1,232	1,155	0.0%	0.0%	58,682,081	6,383	5,984	0.0%	0.0%	7.50%	5.1825
	1991	33,057	23,730,033	1,944	3,294,975	0.0%	13.9%	114,401,690	9,371	15,884,962	0.0%	13.9%	7.50%	4.8210
	1992	44,591	34,448,430	1,690,119	6,171,474	4.9%	17.9%	154,488,113	7,579,543	27,676,713	4.9%	17.9%	7.50%	4.4846
	1993	45,706	40,970,649	3,222,626	8,891,377	7.9%	21.7%	170,918,871	13,443,955	37,092,508	7.9%	21.7%	7.50%	4.1717
	1994	43,660	39,420,810	5,892,071	9,855,045	14.9%	25.0%	152,979,856	22,865,288	38,244,354	14.9%	25.0%	7.50%	3.8807
	1995	41,935	37,637,454	7,837,584	11,266,955	20.8%	29.9%	135,869,031	28,293,224	40,673,056	20.8%	29.9%	7.50%	3.6099
	1996	40,338	36,134,012	10,249,636	15,624,614	28.4%	43.2%	121,341,110	34,419,158	52,468,792	28.4%	43.2%	7.50%	3.3581
	1997	38,927	34,589,007	13,065,641	17,780,628	37.8%	51.4%	108,049,164	40,814,459	55,543,137	37.8%	51.4%	7.50%	3.1238
	1998	37,079	33,122,919	15,916,595	19,443,305	48.1%	58.7%	96,250,601	46,251,415	56,499,544	48.1%	58.7%	7.50%	2.9059
	1999	35,367	31,290,387	18,384,152	22,760,137	58.8%	72.7%	84,581,877	49,694,690	61,523,530	58.8%	72.7%	7.50%	2.7031
	2000	33,954	29,843,654	21,429,396	26,669,331	71.8%	89.4%	75,042,952	53,884,995	67,061,002	71.8%	89.4%	7.50%	2.5145
	2001	32,530	28,399,995	25,397,653	26,494,505	89.4%	93.3%	66,430,531	59,407,740	61,973,391	89.4%	93.3%	7.50%	2.3391
	2002	31,025	26,899,593	27,614,437	30,544,425	102.7%	113.5%	58,531,102	60,086,539	66,461,930	102.7%	113.5%	7.50%	2.1759
	2003	29,613	25,356,832	30,295,561	33,084,721	119.5%	130.5%	51,324,830	61,321,325	66,966,870	119.5%	130.5%	7.50%	2.0241
	2004	28,223	23,927,805	34,061,195	38,627,557	142.3%	161.4%	45,053,332	64,133,353	72,731,292	142.3%	161.4%	7.50%	1.8829
	2005	26,280	21,567,058	37,788,114	41,667,455	175.2%	193.2%	37,775,177	66,186,713	72,981,464	175.2%	193.2%	7.50%	1.7515
	2006	24,689	21,676,207	39,456,399	40,389,114	182.0%	186.3%	35,317,538	64,287,211	65,806,904	182.0%	186.3%	7.50%	1.6293
	2007	23,248	23,466,443	42,827,475	46,146,562	182.5%	196.6%	35,566,894	64,911,425	69,941,995	182.5%	196.6%	7.50%	1.5156
	2008	21,729	21,827,751	46,609,785	52,689,538	213.5%	241.4%	30,775,080	65,715,423	74,287,304	213.5%	241.4%	7.50%	1.4099
	2009	20,116	20,383,511	53,209,364	54,558,958	261.0%	267.7%	26,733,802	69,786,241	71,556,288	261.0%	267.7%	7.50%	1.3115
	2010	18,627	20,581,446	59,151,098	53,964,474	287.4%	262.2%	25,110,141	72,166,573	65,838,696	287.4%	262.2%	7.50%	1.2200
	2011	17,139	18,860,305	61,386,135	56,695,958	325.5%	300.6%	21,404,916	69,668,282	64,345,312	325.5%	300.6%	7.50%	1.1349
	2012	15,757	18,216,181	62,949,458	55,888,139	345.6%	306.8%	19,231,523	66,458,165	59,003,259	345.6%	306.8%	7.50%	1.0557
	1/2013-3/2013	15,465	4,673,528	16,085,355	17,202,549	344.2%	368.1%	4,715,969	16,231,428	17,358,767	344.2%	368.1%	7.50%	1.0091
Projected Future Experience	4/2013-12/2013	14,357	13,692,096	43,598,983	41,966,966	318.4%	306.5%	13,325,753	42,432,457	40,844,106	318.4%	306.5%	7.50%	0.9732
	2014	12,788	18,114,374	50,204,777	54,945,862	277.2%	303.3%	16,548,656	45,865,324	50,196,612	277.2%	303.3%	7.50%	0.9136
	2015	11,525	17,216,241	54,378,689	53,492,030	315.9%	310.7%	14,630,841	46,212,524	45,459,016	315.9%	310.7%	7.50%	0.8498
	2016	10,315	15,211,828	57,783,065	51,507,662	379.9%	338.6%	12,025,521	45,679,681	40,718,740	379.9%	338.6%	7.50%	0.7905
	2017	9,168	13,344,203	58,832,806	49,147,575	440.9%	368.3%	9,813,110	43,264,689	36,142,328	440.9%	368.3%	7.50%	0.7354
	2018	8,091	11,622,779	57,858,222	46,621,258	497.8%	401.1%	7,950,886	39,579,531	31,892,572	497.8%	401.1%	7.50%	0.6841
	2019	7,085	10,048,895	56,385,677	43,924,386	561.1%	437.1%	6,394,630	35,881,112	27,951,351	561.1%	437.1%	7.50%	0.6364
	2020	6,153	8,618,406	54,477,093	40,900,074	632.1%	474.6%	5,101,708	32,247,983	24,211,000	632.1%	474.6%	7.50%	0.5920
	2021	5,299	7,330,909	52,039,664	37,598,702	709.9%	512.9%	4,036,807	28,655,940	20,703,941	709.9%	512.9%	7.50%	0.5507
	2022	4,523	6,182,763	49,057,934	34,129,826	793.5%	552.0%	3,167,046	25,129,333	17,482,590	793.5%	552.0%	7.50%	0.5122
	2023	3,827	5,170,146	45,652,759	30,597,671	883.0%	591.8%	2,463,576	21,753,557	14,579,801	883.0%	591.8%	7.50%	0.4765
	2024	3,209	4,285,744	41,918,856	27,045,710	978.1%	631.1%	1,899,682	18,580,791	11,988,178	978.1%	631.1%	7.50%	0.4433
	2025	2,665	3,520,876	37,964,075	23,611,878	1078.3%	670.6%	1,451,767	15,653,777	9,735,916	1078.3%	670.6%	7.50%	0.4123
	2026	2,191	2,865,728	34,012,584	20,360,721	1186.9%	710.5%	1,099,190	13,046,003	7,809,640	1186.9%	710.5%	7.50%	0.3836
	2027	1,782	2,309,423	30,334,597	17,336,953	1313.5%	750.7%	824,011	10,823,497	6,185,889	1313.5%	750.7%	7.50%	0.3568
	2028	1,435	1,842,759	26,760,343	14,576,115	1452.2%	791.0%	611,631	8,882,037	4,837,965	1452.2%	791.0%	7.50%	0.3319
	2029	1,143	1,455,886	23,347,601	12,097,280	1603.7%	830.9%	449,510	7,208,663	3,735,083	1603.7%	830.9%	7.50%	0.3088
	2030	901	1,138,491	20,144,434	9,904,806	1769.4%	870.0%	326,989	5,785,742	2,844,788	1769.4%	870.0%	7.50%	0.2872
	2031	702	880,822	17,185,159	7,992,814	1951.0%	907.4%	235,333	4,591,442	2,135,479	1951.0%	907.4%	7.50%	0.2672
	2032	540	673,905	14,491,369	6,347,186	2150.4%	941.9%	167,489	3,601,608	1,577,496	2150.4%	941.9%	7.50%	0.2485
	2033	410	509,616	12,073,720	4,955,488	2369.2%	972.4%	117,821	2,791,385	1,145,684	2369.2%	972.4%	7.50%	0.2312
	2034	308	380,702	9,934,783	3,801,875	2609.6%	998.6%	81,876	2,136,626	817,651	2609.6%	998.6%	7.50%	0.2151
	2035	228	280,782	8,071,248	2,866,695	2874.6%	1021.0%	56,174	1,614,739	573,513	2874.6%	1021.0%	7.50%	0.2001
	2036	166	204,324	6,472,446	2,124,032	3167.7%	1039.5%	38,025	1,204,541	395,289	3167.7%	1039.5%	7.50%	0.1861
	2037	119	146,597	5,122,613	1,549,631	3494.4%	1057.1%	25,379	886,822	268,271	3494.4%	1057.1%	7.50%	0.1731
	2038	84	103,619	4,001,529	1,113,081	3861.8%	1074.2%	16,687	644,410	179,252	3861.8%	1074.2%	7.50%	0.1610
	2039	58	72,086	3,085,005	786,434	4279.6%	1091.0%	10,799	462,151	117,812	4279.6%	1091.0%	7.50%	0.1498
	2040	40	49,302	2,347,048	545,933	4760.6%	1107.3%	6,870	327,071	76,078	4760.6%	1107.3%	7.50%	0.1394
	2041	27	33,102	1,761,652	371,819	5321.9%	1123.3%	4,291	228,366	48,199	5321.9%	1123.3%	7.50%	0.1296
	2042	17	21,779	1,304,096	247,996	5987.9%	1138.7%	2,626	157,258	29,905	5987.9%	1138.7%	7.50%	0.1206
	2043	11	14,010	951,765	161,617	6793.6%	1153.6%	1,572	106,764	18,129	6793.6%	1153.6%	7.50%	0.1122
	2044	7	8,787	684,554	102,620	7790.9%	1167.9%	917	71,432	10,708	7790.9%	1167.9%	7.50%	0.1043
	2045	4	5,355	485,018	63,265	9057.8%	1181.5%	520	47,080	6,141	9057.8%	1181.5%	7.50%	0.0971
	2046	2	3,158	338,352	37,709	10715.6%	1194.2%	285	30,552	3,405	10715.6%	1194.2%	7.50%	0.0903
	2047	1	1,792	232,271	21,616	12958.6%	1206.0%	151	19,510	1,816	12958.6%	1206.0%	7.50%	0.0840
	2048	1	973	156,796	11,840	16110.9%	1216.6%	76	12,251	925	16110.9%	1216.6%	7.50%	0.0781
	2049	0	501	103,998	6,147	20739.6%	1225.9%	36	7,559	447	20739.6%	1225.9%	7.50%	0.0727
	2050	0	243	67,704	2,994	27896.3%	1233.8%	16	4,578	202	27896.3%	1233.8%	7.50%	0.0676
	2051	0	109	43,213	1,351	39669.6%	1240.2%	7	2,718	85	39669.6%	1240.2%	7.50%	0.0629
	2052	0	45	27,007	555	60581.5%	1244.9%	3	1,580	32	60581.5%	1244.9%	7.50%	0.0585
	Past		628,824,867	634,523,026	689,712,948	100.9%	109.7%	1,733,238,220	1,097,622,897	1,281,927,053	63.3%	74.0%		
	Future		147,363,153	883,693,507	642,878,173	599.7%	436.3%	102,888,267	505,633,083	404,726,037	491.4%	393.4%		
	Lifetime		776,188,020	1,518,216,533	1,332,591,122	195.6%	171.7%	1,836,126,487	1,603,255,980	1,686,653,090	87.3%	91.9%		

EXHIBIT X
RiverSource Life Insurance Company
Virginia Experience Projections with No Increase
Policy Forms: 30240-VA and 30240-VA1

			Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest						
	Calendar Year	Ending Policies Inforce	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
	1989	97	12,930	0	0	0.0%	0.0%	72,034	0	0	0.0%	0.0%	7.50%	5.5712
	1990	506	281,227	0	0	0.0%	0.0%	1,457,472	0	0	0.0%	0.0%	7.50%	5.1825
	1991	806	545,656	0	0	0.0%	0.0%	2,630,589	0	0	0.0%	0.0%	7.50%	4.8210
	1992	1,107	805,015	0	49,943	0.0%	6.2%	3,610,187	0	223,974	0.0%	6.2%	7.50%	4.4846
	1993	1,134	977,851	32,163	23,317	3.3%	2.4%	4,079,339	134,175	97,272	3.3%	2.4%	7.50%	4.1717
	1994	1,081	928,315	90,262	386,822	9.7%	41.7%	3,602,501	350,279	1,501,136	9.7%	41.7%	7.50%	3.8807
	1995	1,053	897,829	165,157	518,937	18.4%	57.8%	3,241,110	596,207	1,873,331	18.4%	57.8%	7.50%	3.6099
	1996	1,021	873,314	279,475	2,242	32.0%	0.3%	2,932,662	938,500	7,528	32.0%	0.3%	7.50%	3.3581
	1997	991	840,512	263,453	578,394	31.3%	68.8%	2,625,591	822,976	1,806,789	31.3%	68.8%	7.50%	3.1238
Historical	1998	930	801,303	331,945	276,031	41.4%	34.4%	2,328,476	964,586	802,109	41.4%	34.4%	7.50%	2.9059
Experience	1999	895	756,673	393,906	859,750	52.1%	113.6%	2,045,384	1,064,777	2,324,013	52.1%	113.6%	7.50%	2.7031
	2000	863	727,942	637,070	1,540,439	87.5%	211.6%	1,830,436	1,601,937	3,873,490	87.5%	211.6%	7.50%	2.5145
	2001	832	693,976	901,170	984,009	129.9%	141.8%	1,623,282	2,107,929	2,301,699	129.9%	141.8%	7.50%	2.3391
	2002	799	660,626	842,176	419,803	127.5%	63.5%	1,437,462	1,832,499	913,453	127.5%	63.5%	7.50%	2.1759
	2003	765	623,380	775,958	684,644	124.5%	109.8%	1,261,786	1,570,618	1,385,791	124.5%	109.8%	7.50%	2.0241
	2004	735	596,869	850,337	1,013,967	142.5%	169.9%	1,123,836	1,601,087	1,909,184	142.5%	169.9%	7.50%	1.8829
	2005	698	563,947	954,720	1,227,484	169.3%	217.7%	987,766	1,672,213	2,149,964	169.3%	217.7%	7.50%	1.7515
	2006	659	570,833	1,148,821	1,555,807	201.3%	272.6%	930,071	1,871,801	2,534,911	201.3%	272.6%	7.50%	1.6293
	2007	628	617,806	1,195,069	463,582	193.4%	75.0%	936,377	1,811,305	702,628	193.4%	75.0%	7.50%	1.5156
	2008	598	584,110	1,530,315	1,759,989	262.0%	301.3%	823,540	2,157,600	2,481,419	262.0%	301.3%	7.50%	1.4099
	2009	560	551,466	1,498,676	1,775,332	271.8%	321.9%	723,270	1,965,574	2,328,420	271.8%	321.9%	7.50%	1.3115
	2010	520	570,640	1,513,334	724,224	265.2%	126.9%	696,202	1,846,325	883,581	265.2%	126.9%	7.50%	1.2200
	2011	479	528,609	1,642,156	1,901,608	310.7%	359.7%	599,929	1,863,714	2,158,170	310.7%	359.7%	7.50%	1.1349
	2012	445	511,741	1,824,094	1,071,745	356.4%	209.4%	540,264	1,925,766	1,131,483	356.4%	209.4%	7.50%	1.0557
	1/2013-3/2013	439	133,135	391,443	518,971	294.0%	389.8%	134,344	394,998	523,684	294.0%	389.8%	7.50%	1.0091
	4/2013-12/2013	411	389,231	1,229,086	1,246,005	315.8%	320.1%	378,817	1,196,200	1,212,667	315.8%	320.1%	7.50%	0.9732
	2014	375	473,987	1,375,114	1,648,382	290.1%	347.8%	433,018	1,256,256	1,505,904	290.1%	347.8%	7.50%	0.9136
	2015	339	424,414	1,523,188	1,613,414	358.9%	380.2%	360,679	1,294,448	1,371,125	358.9%	380.2%	7.50%	0.8498
	2016	304	377,302	1,641,417	1,566,639	435.0%	415.2%	298,271	1,297,602	1,238,487	435.0%	415.2%	7.50%	0.7905
	2017	271	332,948	1,703,168	1,516,497	511.5%	455.5%	244,845	1,252,482	1,115,207	511.5%	455.5%	7.50%	0.7354
	2018	240	291,726	1,709,407	1,451,107	586.0%	497.4%	199,564	1,169,368	992,670	586.0%	497.4%	7.50%	0.6841
Projected	2019	211	253,696	1,698,254	1,375,736	669.4%	542.3%	161,440	1,080,686	875,452	669.4%	542.3%	7.50%	0.6364
Future	2020	184	218,828	1,670,158	1,287,188	763.2%	588.2%	129,536	988,658	761,957	763.2%	588.2%	7.50%	0.5920
Experience	2021	159	187,209	1,613,038	1,186,167	861.6%	633.6%	103,088	888,229	653,169	861.6%	633.6%	7.50%	0.5507
	2022	136	158,793	1,536,378	1,079,077	967.5%	679.5%	81,340	786,991	552,744	967.5%	679.5%	7.50%	0.5122
	2023	115	133,553	1,445,153	967,142	1082.1%	724.2%	63,638	688,616	460,843	1082.1%	724.2%	7.50%	0.4765
	2024	97	111,346	1,336,143	855,767	1200.0%	768.6%	49,355	592,254	379,324	1200.0%	768.6%	7.50%	0.4433
	2025	80	92,003	1,216,822	750,223	1322.6%	815.4%	37,936	501,734	309,340	1322.6%	815.4%	7.50%	0.4123
	2026	66	75,325	1,097,238	651,647	1456.7%	865.1%	28,892	420,861	249,948	1456.7%	865.1%	7.50%	0.3836
	2027	54	61,057	983,380	560,085	1610.6%	917.3%	21,786	350,874	199,841	1610.6%	917.3%	7.50%	0.3568
	2028	43	48,997	872,528	476,034	1780.8%	971.6%	16,262	289,601	158,001	1780.8%	971.6%	7.50%	0.3319
	2029	35	38,927	766,345	399,789	1968.7%	1027.0%	12,019	236,612	123,436	1968.7%	1027.0%	7.50%	0.3088
	2030	27	30,605	666,082	330,314	2176.4%	1079.3%	8,790	191,307	94,870	2176.4%	1079.3%	7.50%	0.2872
	2031	21	23,800	572,546	268,623	2405.6%	1128.6%	6,359	152,970	71,769	2405.6%	1128.6%	7.50%	0.2672
	2032	16	18,297	486,482	214,435	2658.8%	1172.0%	4,547	120,908	53,294	2658.8%	1172.0%	7.50%	0.2485
	2033	12	13,897	408,295	167,927	2938.0%	1208.4%	3,213	94,396	38,824	2938.0%	1208.4%	7.50%	0.2312
	2034	9	10,422	338,281	129,101	3245.8%	1238.7%	2,241	72,752	27,765	3245.8%	1238.7%	7.50%	0.2151
	2035	7	7,713	276,578	97,377	3585.8%	1262.5%	1,543	55,332	19,481	3585.8%	1262.5%	7.50%	0.2001
	2036	5	5,629	223,082	72,318	3963.1%	1284.7%	1,048	41,516	13,459	3963.1%	1284.7%	7.50%	0.1861
	2037	4	4,048	177,505	52,899	4385.1%	1306.8%	701	30,729	9,158	4385.1%	1306.8%	7.50%	0.1731
	2038	2	2,866	139,326	38,081	4861.7%	1328.8%	462	22,437	6,133	4861.7%	1328.8%	7.50%	0.1610
	2039	2	1,995	107,872	26,949	5406.5%	1350.7%	299	16,160	4,037	5406.5%	1350.7%	7.50%	0.1498
	2040	1	1,364	82,367	18,721	6038.3%	1372.5%	190	11,478	2,609	6038.3%	1372.5%	7.50%	0.1394
	2041	1	914	62,005	12,742	6784.1%	1394.2%	118	8,038	1,652	6784.1%	1394.2%	7.50%	0.1296
	2042	0	599	46,002	8,476	7684.2%	1415.8%	72	5,547	1,022	7684.2%	1415.8%	7.50%	0.1206
	2043	0	382	33,625	5,493	8799.3%	1437.5%	43	3,772	616	8799.3%	1437.5%	7.50%	0.1122
	2044	0	237	24,205	3,455	10222.8%	1459.3%	25	2,526	361	10222.8%	1459.3%	7.50%	0.1043
	2045	0	142	17,152	2,100	12100.1%	1481.3%	14	1,665	204	12100.1%	1481.3%	7.50%	0.0971
	2046	0	82	11,958	1,226	14663.9%	1503.7%	7	1,080	111	14663.9%	1503.7%	7.50%	0.0903
	2047	0	45	8,197	684	18300.2%	1526.5%	4	689	57	18300.2%	1526.5%	7.50%	0.0840
	2048	0	23	5,519	361	23681.6%	1549.9%	2	431	28	23681.6%	1549.9%	7.50%	0.0781
	2049	0	11	3,647	179	32050.0%	1573.7%	1	265	13	32050.0%	1573.7%	7.50%	0.0727
	2050	0	5	2,362	82	45868.2%	1597.8%	0	160	6	45868.2%	1597.8%	7.50%	0.0676
	2051	0	2	1,497	34	70467.6%	1622.4%	0	94	2	70467.6%	1622.4%	7.50%	0.0629
	2052	0	1	928	13	118716.9%	1647.7%	0	54	1	118716.9%	1647.7%	7.50%	0.0585
	Past		15,655,704	17,261,700	18,337,039	110.3%	117.1%	42,273,911	29,094,867	33,914,028	68.8%	80.2%		
	Future		3,792,422	27,112,330	20,082,489	714.9%	529.5%	2,650,163	15,125,778	12,505,587	570.7%	471.9%		
	Lifetime		19,448,126	44,374,030	38,419,527	228.2%	197.5%	44,924,074	44,220,646	46,419,615	98.4%	103.3%		

EXHIBIT X
RiverSource Life Insurance Company
Virginia Experience Projections with 20% Increase
Policy Forms: 30240-VA and 30240-VA1

			Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest						
	Calendar Year	Ending Policies Inforce	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
	1989	97	12,930	0	0	0.0%	0.0%	72,034	0	0	0.0%	0.0%	7.50%	5.5712
	1990	506	281,227	0	0	0.0%	0.0%	1,457,472	0	0	0.0%	0.0%	7.50%	5.1825
	1991	806	545,656	0	0	0.0%	0.0%	2,630,589	0	0	0.0%	0.0%	7.50%	4.8210
	1992	1,107	805,015	0	49,943	0.0%	6.2%	3,610,187	0	223,974	0.0%	6.2%	7.50%	4.4846
	1993	1,134	977,851	32,163	23,317	3.3%	2.4%	4,079,339	134,175	97,272	3.3%	2.4%	7.50%	4.1717
	1994	1,081	928,315	90,262	386,822	9.7%	41.7%	3,602,501	350,279	1,501,136	9.7%	41.7%	7.50%	3.8807
	1995	1,053	897,829	165,157	518,937	18.4%	57.8%	3,241,110	596,207	1,873,331	18.4%	57.8%	7.50%	3.6099
	1996	1,021	873,314	279,475	2,242	32.0%	0.3%	2,932,662	938,500	7,528	32.0%	0.3%	7.50%	3.3581
	1997	991	840,512	263,453	578,394	31.3%	68.8%	2,625,591	822,976	1,806,789	31.3%	68.8%	7.50%	3.1238
Historical	1998	930	801,303	331,945	276,031	41.4%	34.4%	2,328,476	964,586	802,109	41.4%	34.4%	7.50%	2.9059
Experience	1999	895	756,673	393,906	859,750	52.1%	113.6%	2,045,384	1,064,777	2,324,013	52.1%	113.6%	7.50%	2.7031
	2000	863	727,942	637,070	1,540,439	87.5%	211.6%	1,830,436	1,601,937	3,873,490	87.5%	211.6%	7.50%	2.5145
	2001	832	693,976	901,170	984,009	129.9%	141.8%	1,623,282	2,107,929	2,301,699	129.9%	141.8%	7.50%	2.3391
	2002	799	660,626	842,176	419,803	127.5%	63.5%	1,437,462	1,832,499	913,453	127.5%	63.5%	7.50%	2.1759
	2003	765	623,380	775,958	684,644	124.5%	109.8%	1,261,786	1,570,618	1,385,791	124.5%	109.8%	7.50%	2.0241
	2004	735	596,869	850,337	1,013,967	142.5%	169.9%	1,123,836	1,601,087	1,909,184	142.5%	169.9%	7.50%	1.8829
	2005	698	563,947	954,720	1,227,484	169.3%	217.7%	987,766	1,672,213	2,149,964	169.3%	217.7%	7.50%	1.7515
	2006	659	570,833	1,148,821	1,555,807	201.3%	272.6%	930,071	1,871,801	2,534,911	201.3%	272.6%	7.50%	1.6293
	2007	628	617,806	1,195,069	463,582	193.4%	75.0%	936,377	1,811,305	702,628	193.4%	75.0%	7.50%	1.5156
	2008	598	584,110	1,530,315	1,759,989	262.0%	301.3%	823,540	2,157,600	2,481,419	262.0%	301.3%	7.50%	1.4099
	2009	560	551,466	1,498,676	1,775,332	271.8%	321.9%	723,270	1,965,574	2,328,420	271.8%	321.9%	7.50%	1.3115
	2010	520	570,640	1,513,334	724,224	265.2%	126.9%	696,202	1,846,325	883,581	265.2%	126.9%	7.50%	1.2200
	2011	479	528,609	1,642,156	1,901,608	310.7%	359.7%	599,929	1,863,714	2,158,170	310.7%	359.7%	7.50%	1.1349
	2012	445	511,741	1,824,094	1,071,745	356.4%	209.4%	540,264	1,925,766	1,131,483	356.4%	209.4%	7.50%	1.0557
	1/2013-3/2013	439	133,135	391,443	518,971	294.0%	389.8%	134,344	394,998	523,684	294.0%	389.8%	7.50%	1.0091
	4/2013-12/2013	411	389,231	1,229,085	1,245,727	315.8%	320.0%	378,817	1,196,199	1,212,397	315.8%	320.0%	7.50%	0.9732
	2014	367	517,025	1,374,257	1,642,331	265.8%	317.7%	472,336	1,255,473	1,500,376	265.8%	317.7%	7.50%	0.9136
	2015	332	495,097	1,520,695	1,606,389	307.2%	324.5%	420,747	1,292,329	1,365,154	307.2%	324.5%	7.50%	0.8498
	2016	298	440,138	1,636,784	1,552,395	371.9%	352.7%	347,945	1,293,939	1,227,227	371.9%	352.7%	7.50%	0.7905
	2017	266	388,397	1,693,912	1,489,204	436.1%	383.4%	285,621	1,245,675	1,095,136	436.1%	383.4%	7.50%	0.7354
	2018	236	340,309	1,693,477	1,418,643	497.6%	416.9%	232,798	1,158,470	970,462	497.6%	416.9%	7.50%	0.6841
Projected	2019	207	295,946	1,676,672	1,344,625	566.5%	454.3%	188,326	1,066,953	855,654	566.5%	454.3%	7.50%	0.6364
Future	2020	180	255,270	1,644,686	1,257,783	644.3%	492.7%	151,108	973,580	744,551	644.3%	492.7%	7.50%	0.5920
Experience	2021	155	218,385	1,585,279	1,158,811	725.9%	530.6%	120,255	872,943	638,106	725.9%	530.6%	7.50%	0.5507
	2022	133	185,237	1,507,675	1,053,963	813.9%	569.0%	94,886	772,288	539,880	813.9%	569.0%	7.50%	0.5122
	2023	113	155,794	1,416,480	944,439	909.2%	606.2%	74,236	674,953	450,025	909.2%	606.2%	7.50%	0.4765
	2024	95	129,889	1,308,246	835,513	1007.2%	643.3%	57,574	579,888	370,346	1007.2%	643.3%	7.50%	0.4433
	2025	79	107,325	1,190,281	732,325	1109.0%	682.3%	44,253	490,790	301,961	1109.0%	682.3%	7.50%	0.4123
	2026	65	87,869	1,072,476	635,982	1220.5%	723.8%	33,703	411,363	243,940	1220.5%	723.8%	7.50%	0.3836
	2027	53	71,225	960,681	546,525	1348.8%	767.3%	25,414	342,774	195,002	1348.8%	767.3%	7.50%	0.3568
	2028	43	57,156	852,055	464,432	1490.8%	812.6%	18,971	282,806	154,150	1490.8%	812.6%	7.50%	0.3319
	2029	34	45,409	748,161	389,986	1647.6%	858.8%	14,020	230,998	120,410	1647.6%	858.8%	7.50%	0.3088
	2030	27	35,702	650,156	322,170	1821.1%	902.4%	10,254	186,733	92,531	1821.1%	902.4%	7.50%	0.2872
	2031	21	27,764	558,770	261,968	2012.6%	943.6%	7,418	149,289	69,991	2012.6%	943.6%	7.50%	0.2672
	2032	16	21,344	474,709	209,099	2224.1%	979.7%	5,305	117,982	51,968	2224.1%	979.7%	7.50%	0.2485
	2033	12	16,211	398,362	163,732	2457.3%	1010.0%	3,748	92,099	37,854	2457.3%	1010.0%	7.50%	0.2312
	2034	9	12,158	330,010	125,865	2714.4%	1035.3%	2,615	70,974	27,069	2714.4%	1035.3%	7.50%	0.2151
	2035	7	8,997	269,785	94,929	2998.4%	1055.1%	1,800	53,973	18,992	2998.4%	1055.1%	7.50%	0.2001
	2036	5	6,566	217,580	70,495	3313.6%	1073.6%	1,222	40,492	13,119	3313.6%	1073.6%	7.50%	0.1861
	2037	3	4,722	173,110	51,562	3666.1%	1092.0%	817	29,969	8,926	3666.1%	1092.0%	7.50%	0.1731
	2038	2	3,343	135,865	37,116	4064.1%	1110.2%	538	21,880	5,977	4064.1%	1110.2%	7.50%	0.1610
	2039	2	2,327	105,184	26,265	4519.2%	1128.5%	349	15,757	3,935	4519.2%	1128.5%	7.50%	0.1498
	2040	1	1,591	80,308	18,245	5047.0%	1146.6%	222	11,191	2,543	5047.0%	1146.6%	7.50%	0.1394
	2041	1	1,066	60,451	12,417	5670.0%	1164.7%	138	7,836	1,610	5670.0%	1164.7%	7.50%	0.1296
	2042	0	698	44,846	8,260	6421.8%	1182.7%	84	5,408	996	6421.8%	1182.7%	7.50%	0.1206
	2043	0	446	32,778	5,353	7353.4%	1200.8%	50	3,677	600	7353.4%	1200.8%	7.50%	0.1122
	2044	0	276	23,594	3,367	8542.5%	1218.9%	29	2,462	351	8542.5%	1218.9%	7.50%	0.1043
	2045	0	165	16,719	2,046	10110.8%	1237.3%	16	1,623	199	10110.8%	1237.3%	7.50%	0.0971
	2046	0	95	11,655	1,195	12252.5%	1255.9%	9	1,052	108	12252.5%	1255.9%	7.50%	0.0903
	2047	0	52	7,989	666	15290.3%	1275.0%	4	671	56	15290.3%	1275.0%	7.50%	0.0840
	2048	0	27	5,379	352	19785.8%	1294.5%	2	420	27	19785.8%	1294.5%	7.50%	0.0781
	2049	0	13	3,554	174	26776.7%	1314.3%	1	258	13	26776.7%	1314.3%	7.50%	0.0727
	2050	0	6	2,302	80	38320.2%	1334.4%	0	156	5	38320.2%	1334.4%	7.50%	0.0676
	2051	0	2	1,459	34	58869.9%	1354.9%	0	92	2	58869.9%	1354.9%	7.50%	0.0629
	2052	0	1	904	13	99175.9%	1376.0%	0	53	1	99175.9%	1376.0%	7.50%	0.0585
	Past		15,655,704	17,261,700	18,337,039	110.3%	117.1%	42,273,911	29,094,867	33,914,028	68.8%	80.2%		
	Future		4,323,278	26,716,370	19,734,475	618.0%	456.5%	2,995,631	14,955,470	12,321,651	499.2%	411.3%		
	Lifetime		19,978,982	43,978,070	38,071,513	220.1%	190.6%	45,269,542	44,050,338	46,235,679	97.3%	102.1%		

EXHIBIT XI
RiverSource Life Insurance Company
Incurred Loss Ratio Including the Change in Active Life Reserves
Nationwide Experience, without Interest
Policy Form: 30240

Calendar Year	(a) Earned Premiums [1]	(b) Incurred Claims	(c) Change in Active Life Reserves	(d) = (b+c)/(a) Loss Ratio
1989	477,819	0	1,391,207	291.2%
1990	11,323,037	1,155	3,284,193	29.0%
1991	23,730,033	3,294,975	3,237,764	27.5%
1992	34,448,430	6,171,474	19,429,171	74.3%
1993	40,970,649	8,891,377	32,326,913	100.6%
1994	39,420,810	9,855,045	37,913,000	121.2%
1995	37,637,454	11,266,955	36,886,685	127.9%
1996	36,134,012	15,624,614	35,463,628	141.4%
1997	34,589,007	17,780,628	34,003,890	149.7%
1998	33,122,919	19,443,305	32,223,628	156.0%
1999	31,290,387	22,760,137	30,066,684	168.8%
2000	29,843,654	26,669,331	27,595,790	181.8%
2001	28,399,995	26,494,505	24,806,314	180.6%
2002	26,899,593	30,544,425	21,687,898	194.2%
2003	25,356,832	33,084,721	18,308,593	202.7%
2004	23,927,805	38,627,557	14,827,967	223.4%
2005	21,567,058	41,667,455	(9,867,495)	147.4%
2006	21,676,207	40,389,114	4,066,404	205.1%
2007	23,466,443	46,146,562	2,038,046	205.3%
2008	21,827,751	52,689,538	(784,233)	237.8%
2009	20,383,511	54,558,958	(6,179,502)	237.3%
2010	20,581,446	53,964,474	(7,157,861)	227.4%
2011	18,860,305	56,695,958	2,640,564	314.6%
2012	18,216,181	55,888,139	(13,739,295)	231.4%
1/2013-3/2013	4,673,528	17,202,549	(4,446,262)	272.9%
Total	628,824,867	689,712,948	340,023,692	163.8%

[1] Premiums reflect the accumulated 78.5% rate increases as approved in Virginia and implemented from 2006 through 2013 on a nationwide basis.

EXHIBIT XII
RiverSource Life Insurance Company
Incurred Loss Ratio Including the Change in Active Life Reserves
Virginia Experience, without Interest
Policy Forms: 30240-VA and 30240-VA1

Calendar Year	(a) Earned Premiums	(b) Incurred Claims	(c) Change in Active Life Reserves	(d) = (b+c)/(a) Loss Ratio
1989	12,930	0	28,983	224.2%
1990	281,227	0	54,859	19.5%
1991	545,656	0	52,250	9.6%
1992	805,015	49,943	469,461	64.5%
1993	977,851	23,317	820,570	86.3%
1994	928,315	386,822	974,675	146.7%
1995	897,829	518,937	944,138	163.0%
1996	873,314	2,242	913,449	104.9%
1997	840,512	578,394	883,963	174.0%
1998	801,303	276,031	846,271	140.1%
1999	756,673	859,750	800,396	219.4%
2000	727,942	1,540,439	743,463	313.7%
2001	693,976	984,009	677,493	239.4%
2002	660,626	419,803	602,700	154.8%
2003	623,380	684,644	520,755	193.4%
2004	596,869	1,013,967	434,680	242.7%
2005	563,947	1,227,484	253,411	262.6%
2006	570,833	1,555,807	6,654	273.7%
2007	617,806	463,582	65,253	85.6%
2008	584,110	1,759,989	206,335	336.6%
2009	551,466	1,775,332	(24,383)	317.5%
2010	570,640	724,224	(137,587)	102.8%
2011	528,609	1,901,608	530,319	460.1%
2012	511,741	1,071,745	(286,645)	153.4%
1/2013-3/2013	133,135	518,971	(97,624)	316.5%
Total	15,655,704	18,337,039	10,283,838	182.8%

EXHIBIT XIII

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

LIFETIME BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	72.10	54.44	151.34	114.40	230.76	174.54
51	72.10	54.44	151.34	114.40	230.76	174.54
52	72.10	54.44	151.34	114.40	230.76	174.54
53	72.10	54.44	151.34	114.40	230.76	174.54
54	72.10	54.44	151.34	114.40	230.76	174.54
55	72.10	54.44	151.34	114.40	230.76	174.54
56	78.54	60.84	164.74	127.78	249.50	193.64
57	84.78	65.68	178.12	137.96	272.16	210.76
58	94.42	72.10	198.28	151.34	293.74	224.14
59	104.06	78.54	214.16	161.52	315.00	237.54
60	113.68	89.76	229.14	180.78	338.36	266.96
61	126.54	102.44	241.66	195.94	355.88	279.64
62	137.60	108.88	252.88	200.26	364.24	291.96
63	156.88	126.54	275.00	221.84	385.48	310.88
64	174.54	137.76	295.00	232.90	416.00	328.38
65	192.02	157.04	310.72	253.78	442.06	361.04
66	209.70	168.10	328.00	263.24	454.54	364.80
67	233.80	185.80	355.88	282.88	493.28	392.08
68	257.70	209.88	386.90	315.16	541.64	441.16
69	288.24	229.14	420.64	334.26	586.96	466.52
70	318.58	253.06	451.50	358.72	657.46	522.36
71	348.92	277.18	483.64	384.06	669.42	531.46
72	384.24	305.90	516.30	411.18	698.70	556.46
73	425.82	342.84	558.96	449.92	739.92	595.72
74	469.00	377.98	600.90	484.36	788.80	635.88
75	521.84	414.94	652.12	518.44	860.38	684.04
76	576.26	456.52	701.90	556.10	907.66	719.22
77	630.70	504.52	761.70	609.30	986.72	789.36
78	685.14	546.28	805.76	642.48	999.98	841.82
79	737.96	594.28	852.34	686.36	999.98	918.92

EXHIBIT XIII

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

4 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	55.50	39.98	116.36	84.06	161.34	116.54
51	55.50	39.98	116.36	84.06	161.34	116.54
52	55.50	39.98	116.36	84.06	161.34	116.54
53	55.50	39.98	116.36	84.06	161.34	116.54
54	55.50	39.98	116.36	84.06	161.34	116.54
55	55.50	39.98	116.36	84.06	161.34	116.54
56	60.32	44.80	126.70	94.06	174.54	129.56
57	65.32	48.36	137.06	101.36	190.42	140.80
58	72.64	53.00	152.58	111.38	205.42	149.92
59	80.12	57.64	164.74	118.86	220.22	158.84
60	87.46	66.02	176.32	132.96	236.82	178.48
61	97.28	75.30	185.96	144.02	248.98	187.58
62	105.84	80.12	194.52	147.24	254.84	198.28
63	120.64	93.00	211.66	163.12	269.66	207.92
64	134.20	101.36	226.84	171.34	290.72	219.70
65	147.78	115.46	238.96	186.66	305.54	234.32
66	161.34	123.70	252.36	193.46	319.80	247.34
67	179.70	136.70	273.78	208.10	344.98	262.36
68	198.28	154.36	297.68	231.64	378.90	294.84
69	221.66	168.46	323.56	245.74	410.46	311.76
70	245.02	186.16	347.28	263.76	459.72	349.26
71	268.42	203.82	372.12	282.52	468.30	355.52
72	295.52	225.06	397.26	302.32	488.80	371.92
73	327.48	252.00	429.92	330.88	517.36	398.16
74	360.86	278.04	462.22	356.04	551.64	424.92
75	401.36	304.98	501.68	381.20	601.78	457.24
76	443.30	335.68	540.02	408.88	634.96	480.62
77	485.24	371.02	585.90	447.94	690.12	527.54
78	527.02	401.72	619.80	472.40	738.30	562.72
79	567.70	437.04	655.68	504.70	798.10	614.28

EXHIBIT XIII

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

3 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	49.78	37.66	104.56	79.06	144.92	109.60
51	49.78	37.66	104.56	79.06	144.92	109.60
52	49.78	37.66	104.56	79.06	144.92	109.60
53	49.78	37.66	104.56	79.06	144.92	109.60
54	49.78	37.66	104.56	79.06	144.92	109.60
55	49.78	37.66	104.56	79.06	144.92	109.60
56	53.72	41.58	112.80	87.26	155.26	120.10
57	58.90	45.52	123.70	95.66	171.70	132.78
58	65.86	50.34	138.32	105.64	186.32	142.24
59	72.10	54.26	148.30	111.72	198.28	149.36
60	78.54	61.74	158.30	124.56	212.54	167.22
61	86.74	70.32	165.80	134.40	222.02	179.90
62	95.30	75.50	175.08	138.66	229.34	185.24
63	109.24	88.16	191.50	154.54	243.96	196.86
64	120.64	95.14	203.98	160.80	261.46	206.14
65	132.60	108.32	214.32	175.26	271.80	217.72
66	143.84	115.28	225.06	180.42	283.58	227.36
67	162.04	128.68	246.64	195.94	310.88	247.00
68	179.54	146.16	269.66	219.52	343.20	279.32
69	199.34	158.48	290.90	231.28	369.06	293.42
70	219.86	174.54	311.60	247.34	412.60	327.48
71	239.14	189.88	331.40	263.24	417.08	331.24
72	266.46	212.02	358.18	285.02	440.64	350.70
73	296.98	238.80	389.78	313.38	469.00	377.10
74	324.62	261.26	415.82	334.62	496.30	399.40
75	360.14	286.26	449.92	357.66	539.68	429.04
76	395.14	312.86	481.32	381.04	565.92	447.94
77	437.42	349.62	528.26	422.08	622.12	497.04
78	477.24	380.32	561.28	447.22	668.54	532.74
79	510.60	410.82	589.66	474.54	717.62	577.52

EXHIBIT XIII

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

2 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	41.94	31.40	87.98	66.02	122.08	91.54
51	41.94	31.40	87.98	66.02	122.08	91.54
52	41.94	31.40	87.98	66.02	122.08	91.54
53	41.94	31.40	87.98	66.02	122.08	91.54
54	41.94	31.40	87.98	66.02	122.08	91.54
55	41.94	31.40	87.98	66.02	122.08	91.54
56	46.78	33.74	98.34	70.86	135.46	97.62
57	50.50	38.20	106.00	80.32	147.24	111.54
58	55.50	42.66	116.36	89.76	156.68	120.80
59	60.32	46.06	124.20	94.94	166.16	126.90
60	68.88	50.70	139.02	102.08	183.10	137.06
61	73.88	55.14	141.16	105.28	189.00	141.00
62	83.70	63.02	153.84	115.64	201.48	147.94
63	92.44	67.46	161.88	118.32	206.30	150.80
64	105.84	76.40	179.00	129.22	229.50	165.60
65	115.82	84.42	187.22	136.34	242.16	176.32
66	129.40	93.36	202.20	145.98	254.68	184.02
67	142.78	101.20	217.56	154.00	274.12	194.16
68	157.60	113.50	236.64	170.44	301.06	216.86
69	171.14	122.60	249.86	178.82	316.94	226.84
70	184.70	134.90	261.80	191.32	346.58	253.24
71	203.26	147.24	281.62	204.18	354.42	256.98
72	221.66	160.80	297.86	216.14	366.38	265.92
73	240.22	177.04	315.16	232.38	379.24	279.64
74	263.58	194.00	337.66	248.42	402.98	296.44
75	290.54	211.32	363.18	264.14	435.64	316.78
76	318.92	231.64	388.52	282.16	456.68	331.76
77	346.04	253.06	417.78	305.54	492.02	359.76
78	374.42	274.30	440.28	322.66	524.34	384.44
79	406.34	295.72	469.36	341.58	571.26	415.82
80		320.52				
81		346.22				
82		375.50				
83		404.76				
84		442.94				

EXHIBIT XIV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

LIFETIME BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	86.54	65.36	181.68	137.32	277.04	209.54
51	86.54	65.36	181.68	137.32	277.04	209.54
52	86.54	65.36	181.68	137.32	277.04	209.54
53	86.54	65.36	181.68	137.32	277.04	209.54
54	86.54	65.36	181.68	137.32	277.04	209.54
55	86.54	65.36	181.68	137.32	277.04	209.54
56	94.28	73.06	197.76	153.40	299.52	232.46
57	101.76	78.86	213.82	165.62	326.74	253.04
58	113.36	86.54	238.04	181.68	352.66	269.12
59	124.92	94.28	257.08	193.90	378.14	285.16
60	136.48	107.78	275.08	217.06	406.22	320.52
61	151.92	122.98	290.08	235.22	427.20	335.74
62	165.20	130.68	303.60	240.40	437.30	350.50
63	188.36	151.92	330.14	266.30	462.76	373.20
64	209.54	165.40	354.16	279.60	499.42	394.20
65	230.52	188.54	373.00	304.66	530.68	433.44
66	251.74	201.82	393.76	316.04	545.68	437.92
67	280.66	223.04	427.20	339.60	592.18	470.72
68	309.36	251.96	464.48	378.36	650.24	529.60
69	346.04	275.08	505.00	401.28	704.66	560.04
70	382.42	303.80	542.04	430.64	789.28	627.10
71	418.84	332.72	580.58	461.06	803.64	638.04
72	461.28	367.22	619.82	493.64	838.78	668.00
73	511.18	411.58	671.02	540.14	888.24	715.16
74	563.04	453.76	721.40	581.44	946.96	763.36
75	626.48	498.12	782.86	622.40	999.98	821.20
76	691.80	548.02	842.64	667.58	999.98	863.40
77	757.16	605.68	914.40	731.42	999.98	947.62
78	822.50	655.80	967.32	771.28	999.98	999.98
79	885.92	713.42	999.98	824.00	999.98	999.98

EXHIBIT XIV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

4 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	66.62	48.00	139.68	100.90	193.68	139.90
51	66.62	48.00	139.68	100.90	193.68	139.90
52	66.62	48.00	139.68	100.90	193.68	139.90
53	66.62	48.00	139.68	100.90	193.68	139.90
54	66.62	48.00	139.68	100.90	193.68	139.90
55	66.62	48.00	139.68	100.90	193.68	139.90
56	72.44	53.78	152.12	112.92	209.54	155.54
57	78.40	58.08	164.54	121.68	228.60	169.06
58	87.22	63.64	183.20	133.70	246.60	179.98
59	96.22	69.22	197.76	142.70	264.38	190.68
60	105.00	79.28	211.66	159.60	284.30	214.24
61	116.78	90.40	223.24	172.92	298.88	225.20
62	127.04	96.22	233.52	176.76	305.96	238.04
63	144.82	111.64	254.08	195.82	323.72	249.62
64	161.12	121.68	272.30	205.68	349.00	263.74
65	177.38	138.62	286.88	224.12	366.76	281.30
66	193.68	148.48	302.92	232.24	383.92	296.96
67	215.76	164.12	328.66	249.82	414.14	314.96
68	238.04	185.32	357.36	278.08	454.84	353.96
69	266.08	202.24	388.44	295.00	492.76	374.28
70	294.16	223.48	416.92	316.66	551.88	419.30
71	322.22	244.68	446.72	339.14	562.18	426.76
72	354.80	270.16	476.90	362.96	586.82	446.50
73	393.14	302.52	516.12	397.22	621.12	477.98
74	433.20	333.80	554.90	427.42	662.24	510.12
75	481.84	366.14	602.26	457.64	722.42	548.90
76	532.18	403.00	648.28	490.84	762.28	576.98
77	582.56	445.44	703.40	537.76	828.50	633.32
78	632.66	482.28	744.08	567.12	886.34	675.50
79	681.52	524.72	787.12	605.88	958.10	737.44

EXHIBIT XIV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

3 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	59.78	45.22	125.54	94.92	173.96	131.54
51	59.78	45.22	125.54	94.92	173.96	131.54
52	59.78	45.22	125.54	94.92	173.96	131.54
53	59.78	45.22	125.54	94.92	173.96	131.54
54	59.78	45.22	125.54	94.92	173.96	131.54
55	59.78	45.22	125.54	94.92	173.96	131.54
56	64.52	49.92	135.40	104.76	186.38	144.20
57	70.70	54.64	148.48	114.84	206.12	159.38
58	79.08	60.40	166.04	126.82	223.68	170.76
59	86.54	65.14	178.06	134.12	238.04	179.36
60	94.28	74.14	190.06	149.54	255.16	200.76
61	104.14	84.40	199.06	161.32	266.54	215.98
62	114.40	90.64	210.16	166.48	275.30	222.38
63	131.14	105.84	229.88	185.52	292.90	236.30
64	144.82	114.22	244.90	193.04	313.88	247.46
65	159.20	130.06	257.30	210.38	326.30	261.38
66	172.70	138.40	270.16	216.60	340.44	272.92
67	194.52	154.48	296.08	235.22	373.20	296.50
68	215.52	175.48	323.72	263.52	412.00	335.30
69	239.32	190.24	349.22	277.66	443.06	352.22
70	263.92	209.54	374.06	296.96	495.34	393.14
71	287.08	227.96	397.84	316.04	500.68	397.64
72	319.90	254.52	430.00	342.16	528.98	421.00
73	356.52	286.66	467.90	376.22	563.04	452.68
74	389.72	313.66	499.20	401.72	595.82	479.48
75	432.36	343.66	540.14	429.34	647.88	515.04
76	474.34	375.58	577.82	457.42	679.36	537.76
77	525.12	419.72	634.18	506.72	746.86	596.68
78	572.90	456.56	673.80	536.90	802.56	639.52
79	612.96	493.18	707.86	569.68	861.48	693.28

EXHIBIT XIV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

2 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	50.36	37.70	105.62	79.28	146.56	109.90
51	50.36	37.70	105.62	79.28	146.56	109.90
52	50.36	37.70	105.62	79.28	146.56	109.90
53	50.36	37.70	105.62	79.28	146.56	109.90
54	50.36	37.70	105.62	79.28	146.56	109.90
55	50.36	37.70	105.62	79.28	146.56	109.90
56	56.14	40.48	118.06	85.06	162.62	117.20
57	60.64	45.84	127.28	96.40	176.76	133.92
58	66.62	51.22	139.68	107.78	188.08	145.06
59	72.44	55.28	149.12	114.00	199.46	152.32
60	82.68	60.86	166.90	122.54	219.82	164.54
61	88.70	66.22	169.46	126.40	226.90	169.24
62	100.48	75.62	184.68	138.84	241.90	177.60
63	110.98	80.98	194.32	142.06	247.66	181.06
64	127.04	91.68	214.90	155.12	275.52	198.84
65	139.06	101.36	224.74	163.70	290.74	211.66
66	155.32	112.06	242.74	175.28	305.74	220.88
67	171.40	121.48	261.16	184.90	329.06	233.12
68	189.20	136.28	284.08	204.60	361.44	260.32
69	205.48	147.20	299.96	214.68	380.50	272.30
70	221.74	161.96	314.30	229.66	416.06	304.00
71	244.04	176.76	338.06	245.08	425.48	308.52
72	266.08	193.04	357.58	259.46	439.88	319.22
73	288.36	212.52	378.36	278.96	455.28	335.74
74	316.46	232.90	405.36	298.22	483.76	355.88
75	348.80	253.68	436.00	317.08	522.98	380.30
76	382.88	278.08	466.42	338.74	548.28	398.30
77	415.44	303.80	501.56	366.76	590.68	431.90
78	449.50	329.30	528.56	387.36	629.44	461.48
79	487.84	355.00	563.44	410.06	685.80	499.20
80		384.76				
81		415.64				
82		450.76				
83		485.90				
84		531.76				

EXHIBIT XIV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

LIFETIME BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	86.54	65.36	181.68	137.32	277.04	209.54
51	86.54	65.36	181.68	137.32	277.04	209.54
52	86.54	65.36	181.68	137.32	277.04	209.54
53	86.54	65.36	181.68	137.32	277.04	209.54
54	86.54	65.36	181.68	137.32	277.04	209.54
55	86.54	65.36	181.68	137.32	277.04	209.54
56	94.28	73.06	197.76	153.40	299.52	232.46
57	101.76	78.86	213.82	165.62	326.74	253.04
58	113.36	86.54	238.04	181.68	352.66	269.12
59	124.92	94.28	257.08	193.90	378.14	285.16
60	136.48	107.78	275.08	217.06	406.22	320.52
61	151.92	122.98	290.08	235.22	427.20	335.74
62	165.20	130.68	303.60	240.40	437.30	350.50
63	188.36	151.92	330.14	266.30	462.76	373.20
64	209.54	165.40	354.16	279.60	499.42	394.20
65	230.52	188.54	373.00	304.66	530.68	433.44
66	251.74	201.82	393.76	316.04	545.68	437.92
67	280.66	223.04	427.20	339.60	592.18	470.72
68	309.36	251.96	464.48	378.36	650.24	529.60
69	346.04	275.08	505.00	401.28	704.66	560.04
70	382.42	303.80	542.04	430.64	789.28	627.10
71	418.84	332.72	580.58	461.06	803.64	638.04
72	461.28	367.22	619.82	493.64	838.78	668.00
73	511.18	411.58	671.02	540.14	888.24	715.16
74	563.04	453.76	721.40	581.44	946.96	763.36
75	626.48	498.12	782.86	622.40	999.98	821.20
76	691.80	548.02	842.64	667.58	999.98	863.40
77	757.16	605.68	914.40	731.42	999.98	947.62
78	822.50	655.80	967.32	771.28	999.98	999.98
79	885.92	713.42	999.98	824.00	999.98	999.98

EXHIBIT XIV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

4 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	66.62	48.00	139.68	100.90	193.68	139.90
51	66.62	48.00	139.68	100.90	193.68	139.90
52	66.62	48.00	139.68	100.90	193.68	139.90
53	66.62	48.00	139.68	100.90	193.68	139.90
54	66.62	48.00	139.68	100.90	193.68	139.90
55	66.62	48.00	139.68	100.90	193.68	139.90
56	72.44	53.78	152.12	112.92	209.54	155.54
57	78.40	58.08	164.54	121.68	228.60	169.06
58	87.22	63.64	183.20	133.70	246.60	179.98
59	96.22	69.22	197.76	142.70	264.38	190.68
60	105.00	79.28	211.66	159.60	284.30	214.24
61	116.78	90.40	223.24	172.92	298.88	225.20
62	127.04	96.22	233.52	176.76	305.96	238.04
63	144.82	111.64	254.08	195.82	323.72	249.62
64	161.12	121.68	272.30	205.68	349.00	263.74
65	177.38	138.62	286.88	224.12	366.76	281.30
66	193.68	148.48	302.92	232.24	383.92	296.96
67	215.76	164.12	328.66	249.82	414.14	314.96
68	238.04	185.32	357.36	278.08	454.84	353.96
69	266.08	202.24	388.44	295.00	492.76	374.28
70	294.16	223.48	416.92	316.66	551.88	419.30
71	322.22	244.68	446.72	339.14	562.18	426.76
72	354.80	270.16	476.90	362.96	586.82	446.50
73	393.14	302.52	516.12	397.22	621.12	477.98
74	433.20	333.80	554.90	427.42	662.24	510.12
75	481.84	366.14	602.26	457.64	722.42	548.90
76	532.18	403.00	648.28	490.84	762.28	576.98
77	582.56	445.44	703.40	537.76	828.50	633.32
78	632.66	482.28	744.08	567.12	886.34	675.50
79	681.52	524.72	787.12	605.88	958.10	737.44

EXHIBIT XIV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

3 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	59.78	45.22	125.54	94.92	173.96	131.54
51	59.78	45.22	125.54	94.92	173.96	131.54
52	59.78	45.22	125.54	94.92	173.96	131.54
53	59.78	45.22	125.54	94.92	173.96	131.54
54	59.78	45.22	125.54	94.92	173.96	131.54
55	59.78	45.22	125.54	94.92	173.96	131.54
56	64.52	49.92	135.40	104.76	186.38	144.20
57	70.70	54.64	148.48	114.84	206.12	159.38
58	79.08	60.40	166.04	126.82	223.68	170.76
59	86.54	65.14	178.06	134.12	238.04	179.36
60	94.28	74.14	190.06	149.54	255.16	200.76
61	104.14	84.40	199.06	161.32	266.54	215.98
62	114.40	90.64	210.16	166.48	275.30	222.38
63	131.14	105.84	229.88	185.52	292.90	236.30
64	144.82	114.22	244.90	193.04	313.88	247.46
65	159.20	130.06	257.30	210.38	326.30	261.38
66	172.70	138.40	270.16	216.60	340.44	272.92
67	194.52	154.48	296.08	235.22	373.20	296.50
68	215.52	175.48	323.72	263.52	412.00	335.30
69	239.32	190.24	349.22	277.66	443.06	352.22
70	263.92	209.54	374.06	296.96	495.34	393.14
71	287.08	227.96	397.84	316.04	500.68	397.64
72	319.90	254.52	430.00	342.16	528.98	421.00
73	356.52	286.66	467.90	376.22	563.04	452.68
74	389.72	313.66	499.20	401.72	595.82	479.48
75	432.36	343.66	540.14	429.34	647.88	515.04
76	474.34	375.58	577.82	457.42	679.36	537.76
77	525.12	419.72	634.18	506.72	746.86	596.68
78	572.90	456.56	673.80	536.90	802.56	639.52
79	612.96	493.18	707.86	569.68	861.48	693.28

EXHIBIT XIV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

2 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	50.36	37.70	105.62	79.28	146.56	109.90
51	50.36	37.70	105.62	79.28	146.56	109.90
52	50.36	37.70	105.62	79.28	146.56	109.90
53	50.36	37.70	105.62	79.28	146.56	109.90
54	50.36	37.70	105.62	79.28	146.56	109.90
55	50.36	37.70	105.62	79.28	146.56	109.90
56	56.14	40.48	118.06	85.06	162.62	117.20
57	60.64	45.84	127.28	96.40	176.76	133.92
58	66.62	51.22	139.68	107.78	188.08	145.06
59	72.44	55.28	149.12	114.00	199.46	152.32
60	82.68	60.86	166.90	122.54	219.82	164.54
61	88.70	66.22	169.46	126.40	226.90	169.24
62	100.48	75.62	184.68	138.84	241.90	177.60
63	110.98	80.98	194.32	142.06	247.66	181.06
64	127.04	91.68	214.90	155.12	275.52	198.84
65	139.06	101.36	224.74	163.70	290.74	211.66
66	155.32	112.06	242.74	175.28	305.74	220.88
67	171.40	121.48	261.16	184.90	329.06	233.12
68	189.20	136.28	284.08	204.60	361.44	260.32
69	205.48	147.20	299.96	214.68	380.50	272.30
70	221.74	161.96	314.30	229.66	416.06	304.00
71	244.04	176.76	338.06	245.08	425.48	308.52
72	266.08	193.04	357.58	259.46	439.88	319.22
73	288.36	212.52	378.36	278.96	455.28	335.74
74	316.46	232.90	405.36	298.22	483.76	355.88
75	348.80	253.68	436.00	317.08	522.98	380.30
76	382.88	278.08	466.42	338.74	548.28	398.30
77	415.44	303.80	501.56	366.76	590.68	431.90
78	449.50	329.30	528.56	387.36	629.44	461.48
79	487.84	355.00	563.44	410.06	685.80	499.20
80		384.76				
81		415.64				
82		450.76				
83		485.90				
84		531.76				

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Actuarial Memorandum for 30240 Series

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Policy forms 30240-VA and 30240-VA1 are individual policy forms providing benefits to individuals for confinement in a nursing home. These forms were issued in Virginia from August 15, 1989 to May 15, 1993.

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

These are individually underwritten policy forms which pay a daily benefit for confinement in a nursing home. The payments commence after an elimination period of 20 or 100 days depending on the plan chosen. No prior hospitalization is required.

After discharge from the nursing home, a post confinement benefit is also payable for up to as many days as nursing home benefits were received. The amount paid will be equal to the following percentage of the daily benefit paid on the last day of the insured's most recent nursing home stay: 70% for the first 30 days, 60% for the next 30 days, and 50% for each day thereafter. The absolute maximum benefit period for both the nursing home benefit and the post confinement benefit is 2, 3, or 4 years, or unlimited, again depending on the plan chosen at issue. Premiums which become due during a nursing home stay after benefits have been paid for at least 90 days beyond the elimination period are waived.

Benefit eligibility for nursing home coverage is based on any one of the following: sickness or injury, 3 or more Activities of Daily Living (ADL) deficiencies out of 6 ADLs, or cognitive impairment. As defined in the policy, the 6 ADLs are: Bathing, Dressing, Toileting, Continence, Transferring, and Feeding.

An insured can elect at issue an option that will increase the benefit by a fixed amount (5% of the initial benefit) per year from the second year through the anniversary following the insured's 85th birthday ("Simple BIO") or will increase the previous year's daily benefit by 5% per year from the second year on for life ("Compound BIO"). The benefit will remain level thereafter. The increasing benefit is applicable even if the policy is in claim status. Simple BIO is available in all states, whereas Compound BIO is only available in some states. In Virginia, Simple BIO is available for both forms 30240-VA and 30240-VA1, while the Compound BIO is only available for form 30240-VA1.

3. Renewability

These policy forms are guaranteed renewable for life.

4. Applicability

This filing is applicable to inforce policies only, as these policy forms are no longer being sold in the market. The premium changes will apply to the base forms but not the optional home care rider.

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.

<u>Morbidity</u>
Expected claim costs are the product of original pricing expected claim costs and an actual-to-expected adjustment factor.

Pricing frequencies and severities of claims were originally developed using 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 identifiable for the combinations of elimination periods and maximum benefit limits. This data represented the expected claim costs of the non-increasing benefit nursing home stay. A loading in claim costs was then applied for both the post confinement benefit and waiver of premium benefits. Claim costs for the increasing benefit plan were adjusted appropriately to reflect the 5% annual increase.

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

	Age at Issue						
Duration	**<53**	**53–57**	**58–62**	**63–67**	**68–72**	**73–77**	**78+**
1	0.45	0.45	0.80	0.90	1.30	1.70	1.70
2	0.45	0.45	0.85	0.95	1.30	1.70	1.70
3	0.50	0.50	0.85	0.95	1.30	1.70	1.70
4	0.50	0.50	0.90	1.00	1.30	1.70	1.70
5	0.50	0.50	0.90	1.10	1.30	1.70	1.70
6	0.50	0.50	0.90	1.20	1.30	1.35	1.40
7	0.50	0.50	0.95	1.20	1.30	1.35	1.40
8	0.50	0.50	1.00	1.30	1.30	1.35	1.40
9	0.50	0.50	1.05	1.30	1.30	1.35	1.40
10	0.65	0.65	1.10	1.35	1.35	1.35	1.40
11	0.70	0.70	1.15	1.45	1.40	1.35	1.40
12	0.75	0.75	1.20	1.45	1.40	1.35	1.40
13	0.80	0.80	1.25	1.45	1.40	1.35	1.40
14	0.85	0.85	1.30	1.45	1.40	1.35	1.40
15	0.90	0.90	1.35	1.45	1.50	1.35	1.40
16	0.95	0.95	1.40	1.50	1.55	1.35	1.40
17	0.95	1.00	1.45	1.60	1.60	1.35	1.40
18	0.95	1.10	1.50	1.70	1.65	1.35	1.40
19	0.95	1.10	1.50	1.70	1.65	1.35	1.40
20	0.95	1.10	1.50	1.70	1.70	1.35	1.40
21	0.95	1.10	1.50	1.70	1.70	1.35	1.40
22	0.95	1.10	1.50	1.70	1.70	1.35	1.40
23	1.00	1.10	1.50	1.70	1.70	1.35	1.40
24	1.00	1.10	1.50	1.70	1.70	1.35	1.40
25	1.05	1.10	1.50	1.70	1.70	1.40	1.40
26	1.05	1.10	1.50	1.70	1.70	1.40	1.40
27	1.05	1.10	1.50	1.70	1.70	1.40	1.45
28	1.05	1.10	1.50	1.70	1.70	1.45	1.45
29	1.05	1.10	1.50	1.70	1.70	1.45	1.45
30+	1.10	1.10	1.50	1.70	1.70	1.45	1.45

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Non-Lifetime Benefit Actual-to-Expected Adjustment Factors

	Age at Issue							
Duration	**<53**	**53–57**	**58–62**	**63–67**	**68–72**	**73–77**	**78-82**	**83+**
1	0.20	0.20	0.25	0.45	0.75	0.80	0.80	1.70
2	0.20	0.20	0.30	0.55	0.75	0.80	1.15	1.70
3	0.20	0.20	0.35	0.55	0.80	0.80	1.25	1.70
4	0.25	0.25	0.45	0.65	0.80	0.95	1.40	1.70
5	0.25	0.25	0.50	0.65	0.80	1.00	1.40	1.70
6	0.30	0.30	0.55	0.70	0.90	1.00	1.40	1.70
7	0.30	0.30	0.55	0.70	0.90	1.00	1.40	1.70
8	0.30	0.30	0.60	0.80	1.00	1.00	1.40	1.70
9	0.35	0.35	0.60	0.80	1.00	1.20	1.40	1.70
10	0.35	0.35	0.65	0.90	1.00	1.20	1.40	1.70
11	0.35	0.35	0.70	0.95	1.20	1.20	1.40	1.65
12	0.35	0.45	0.75	1.00	1.20	1.20	1.40	1.65
13	0.35	0.45	0.80	1.05	1.20	1.25	1.40	1.65
14	0.35	0.50	0.85	1.10	1.20	1.25	1.40	1.65
15	0.35	0.55	0.90	1.15	1.20	1.30	1.40	1.65
16	0.35	0.55	0.90	1.15	1.40	1.30	1.40	1.65
17	0.55	0.65	1.00	1.15	1.40	1.30	1.40	1.65
18	0.55	0.75	1.05	1.15	1.40	1.30	1.40	1.70
19	0.55	0.75	1.05	1.15	1.40	1.30	1.40	1.80
20	0.75	0.75	1.05	1.15	1.40	1.30	1.40	1.80
21	0.75	0.75	1.05	1.15	1.40	1.30	1.40	1.80
22	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
23	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
24	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
25	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
26	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
27	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
28	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
29	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
30	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
31	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
32	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
33	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
34	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
35+	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80

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.

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 99.7%. This experience is based on 8,695 actual claims (5,026 lifetime and 3,669 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 30240, 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.

<u>Mortality</u>
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%.

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). 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. 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 9,255 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

Adverse selection of 2.8% in the year of rate increase notification to policyholders grading down to 0% in the 4th year after rate increase notification is assumed.

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

2005, 2008 and 2009 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 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 these particular policy forms; they do not include any provision for profit or contingencies.

Exhibit VI provides the assumptions used in the 2004 rate increase filing, Exhibit VII provides the assumptions used in the 2008 rate increase filing and Exhibit VIII provides the assumptions used in the 2011 rate increase filing.

6. Marketing Method

These policy forms were marketed by agents of RiverSource Life.

7. Underwriting Description

These policy forms were 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 benefit limit, the initial daily benefit, the elimination period, and the Benefit Increase Option.

9. Issue Age Range

The issue ages are from 50 to 79 except for the benefit structure with 2-year benefit period, 100-day elimination period with no Benefit Increase Option, which is 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):

Premium Mode	Modal Factors	Percent Distribution
Annual	1.0000*AP + 0.0	46.3%
Semi-Annual	0.5020*AP+ 0.4	10.8%
Quarterly	0.2580*AP+ 0.5	8.6%
Monthly	0.0868*AP+ 0.6	34.3%

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 XI and XII.

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 30240 is shown in Exhibit IX, and Virginia experience for policy forms 30240-VA and 30240-VA1 is shown in Exhibit X. Exhibit XI shows nationwide past experience including earned premiums, incurred claims, increase in active life reserves and incurred loss ratios by calendar year, and Exhibit XII 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 to be 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 <u>illustration</u> 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* for 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

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 IX, X, XI and XII 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 IX, X, XI and XII 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 IX and X 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 7.5%, 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 XI and XII 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

Three prior increases have been approved and implemented on these forms. A 29% increase was approved in November 2005 and implemented on each contract's next policy anniversary beginning in March 2006. A 15% increase was approved in March 2009 and implemented on each contract's next policy anniversary beginning in June 2009. A 20.3% 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 X and XII reflect the impact of these increases.

The actual and projected premiums in Exhibits IX and XI reflect the accumulated rate increases as approved in Virginia and implemented from 2006 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 20%.

Projected experience assuming this increase is implemented is shown in Exhibits IX and X. 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 these forms 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 (Nursing Home Annual Premium Based on March 31, 2013 Inforce)

Before increase:	$1,231
After increase:	$1,476

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:

Issue Ages	Percent Distribution
<55	9.0%
55-59	24.5%
60-64	35.5%
65-69	22.6%
70-74	7.3%
75-79	1.0%
>79	0.1%

By Elimination Period:

Elimination Period	Percent Distribution
20-day	32.0%
100-day	68.0%

By Benefit Period:

Benefit Period	Percent Distribution
2-Year	3.6%
3-Year	6.4%
4-Year	22.6%
Unlimited	67.4%

By Inflation Protection Option:

Inflation Option	Percent Distribution
None	38.6%
Simple to Age 85	59.9%
Compound for Life	1.5%

20. Number of Policyholders

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

	Number of Insured	Nursing Home Annual Premium
Virginia	439	$540,213
Nationwide	15,465	$19,032,381

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).

Anju Gupta-Lavey

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 Forms: 30240-VA and 30240-VA1

Original Pricing Assumptions

Mortality: 1983 Individual Annuitant Mortality Table

Lapse Rates:

Duration	Rate
1	11%
2	8%
3	7%
4	6%
5+	5%

Morbidity: Pricing frequencies and severities of claims were originally developed using 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 identifiable for the combinations of elimination periods and maximum benefit limits. This data represented the expected claim costs of the non-increasing benefit nursing home stay. A loading in claim costs was then applied for both the post confinement benefit and waiver of premium benefits. Claim costs for the increasing benefit plan were adjusted appropriately to reflect the 5% annual increase.

The following selection factors were used:

Duration	Factor
1	40%
2	50%
3	60%
4	70%
5	80%
6	90%
7+	100%

Interest Rate: 7.5%

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

Policy Forms: 30240-VA and 30240-VA1

Current Assumptions

Mortality: 1983 Individual Annuitant Mortality Basic Table with selection.

Mortality Selection Factors

	Issue Age Band					
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%	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 Forms: 30240-VA and 30240-VA1

Current Assumptions (continued)

Lapse Rates:

Lifetime Benefit

	Issue Age Band		
Duration	<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%

Non-Lifetime Benefit

	Issue Age Band		
Duration	<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%

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.

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

Policy Forms: 30240-VA and 30240-VA1

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

	Issue Age Band						
Duration	<53	53–57	58–62	63–67	68–72	73–77	78+
1	0.45	0.45	0.80	0.90	1.30	1.70	1.70
2	0.45	0.45	0.85	0.95	1.30	1.70	1.70
3	0.50	0.50	0.85	0.95	1.30	1.70	1.70
4	0.50	0.50	0.90	1.00	1.30	1.70	1.70
5	0.50	0.50	0.90	1.10	1.30	1.70	1.70
6	0.50	0.50	0.90	1.20	1.30	1.35	1.40
7	0.50	0.50	0.95	1.20	1.30	1.35	1.40
8	0.50	0.50	1.00	1.30	1.30	1.35	1.40
9	0.50	0.50	1.05	1.30	1.30	1.35	1.40
10	0.65	0.65	1.10	1.35	1.35	1.35	1.40
11	0.70	0.70	1.15	1.45	1.40	1.35	1.40
12	0.75	0.75	1.20	1.45	1.40	1.35	1.40
13	0.80	0.80	1.25	1.45	1.40	1.35	1.40
14	0.85	0.85	1.30	1.45	1.40	1.35	1.40
15	0.90	0.90	1.35	1.45	1.50	1.35	1.40
16	0.95	0.95	1.40	1.50	1.55	1.35	1.40
17	0.95	1.00	1.45	1.60	1.60	1.35	1.40
18	0.95	1.10	1.50	1.70	1.65	1.35	1.40
19	0.95	1.10	1.50	1.70	1.65	1.35	1.40
20	0.95	1.10	1.50	1.70	1.70	1.35	1.40
21	0.95	1.10	1.50	1.70	1.70	1.35	1.40
22	0.95	1.10	1.50	1.70	1.70	1.35	1.40
23	1.00	1.10	1.50	1.70	1.70	1.35	1.40
24	1.00	1.10	1.50	1.70	1.70	1.35	1.40
25	1.05	1.10	1.50	1.70	1.70	1.40	1.40
26	1.05	1.10	1.50	1.70	1.70	1.40	1.40
27	1.05	1.10	1.50	1.70	1.70	1.40	1.45
28	1.05	1.10	1.50	1.70	1.70	1.45	1.45
29	1.05	1.10	1.50	1.70	1.70	1.45	1.45
30+	1.10	1.10	1.50	1.70	1.70	1.45	1.45

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

Policy Forms: 30240-VA and 30240-VA1

Current Assumptions (continued)

Morbidity (continued):

Non-Lifetime Benefit Actual-to-Expected Adjustment Factors

	Age at Issue							
Duration	<53	53–57	58–62	63–67	68–72	73–77	78-82	83+
1	0.20	0.20	0.25	0.45	0.75	0.80	0.80	1.70
2	0.20	0.20	0.30	0.55	0.75	0.80	1.15	1.70
3	0.20	0.20	0.35	0.55	0.80	0.80	1.25	1.70
4	0.25	0.25	0.45	0.65	0.80	0.95	1.40	1.70
5	0.25	0.25	0.50	0.65	0.80	1.00	1.40	1.70
6	0.30	0.30	0.55	0.70	0.90	1.00	1.40	1.70
7	0.30	0.30	0.55	0.70	0.90	1.00	1.40	1.70
8	0.30	0.30	0.60	0.80	1.00	1.00	1.40	1.70
9	0.35	0.35	0.60	0.80	1.00	1.20	1.40	1.70
10	0.35	0.35	0.65	0.90	1.00	1.20	1.40	1.70
11	0.35	0.35	0.70	0.95	1.20	1.20	1.40	1.65
12	0.35	0.45	0.75	1.00	1.20	1.20	1.40	1.65
13	0.35	0.45	0.80	1.05	1.20	1.25	1.40	1.65
14	0.35	0.50	0.85	1.10	1.20	1.25	1.40	1.65
15	0.35	0.55	0.90	1.15	1.20	1.30	1.40	1.65
16	0.35	0.55	0.90	1.15	1.40	1.30	1.40	1.65
17	0.55	0.65	1.00	1.15	1.40	1.30	1.40	1.65
18	0.55	0.75	1.05	1.15	1.40	1.30	1.40	1.70
19	0.55	0.75	1.05	1.15	1.40	1.30	1.40	1.80
20	0.75	0.75	1.05	1.15	1.40	1.30	1.40	1.80
21	0.75	0.75	1.05	1.15	1.40	1.30	1.40	1.80
22	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
23	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
24	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
25	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
26	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
27	0.85	0.80	1.05	1.15	1.40	1.30	1.40	1.80
28	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
29	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
30	0.90	0.90	1.05	1.15	1.40	1.30	1.40	1.80
31	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
32	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
33	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
34	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80
35+	1.00	1.00	1.05	1.15	1.40	1.30	1.40	1.80

The following adverse selection factors are used:

Year of Policyholder Notification *	Without Current Requested Increase	With Current Requested Increase
1	0.0%	2.8%
2	0.0%	1.8%
3	0.0%	0.8%
4	0.0%	0.0%

* For currently requested increase

Interest Rate: 7.5%

EXHIBIT II
RiverSource Life Insurance Company
Nationwide Nursing Home Claim Experience
For Policy Anniversaries through 2011
Policy Form: 30240
Expected Claims Based on Current Assumptions

SPLIT BY BENEFIT PERIOD AND DURATION									
	Lifetime Benefit Period			Non-Lifetime Benefit Period			All		
Duration	Actual	Expected	A/E	Actual	Expected	A/E	Actual	Expected	A/E
1	789,358	677,271	116.5%	384,639	356,589	107.9%	1,173,997	1,033,860	113.6%
2	2,580,958	2,424,853	106.4%	1,263,462	1,309,491	96.5%	3,844,419	3,734,344	102.9%
3	4,939,263	4,836,165	102.1%	2,432,574	2,498,556	97.4%	7,371,838	7,334,721	100.5%
4	6,348,745	6,849,268	92.7%	4,640,887	3,688,642	125.8%	10,989,632	10,537,909	104.3%
5	7,564,373	8,396,886	90.1%	4,217,664	4,341,175	97.2%	11,782,036	12,738,060	92.5%
6	12,152,822	9,288,847	130.8%	4,530,005	5,180,844	87.4%	16,682,827	14,469,691	115.3%
7	10,444,924	11,684,916	89.4%	6,278,334	6,210,425	101.1%	16,723,258	17,895,341	93.5%
8	12,526,103	13,371,042	93.7%	6,290,152	7,020,112	89.6%	18,816,255	20,391,154	92.3%
9	14,234,562	14,960,346	95.1%	8,747,145	7,942,864	110.1%	22,981,707	22,903,210	100.3%
10	15,356,326	17,137,978	89.6%	6,621,584	8,563,397	77.3%	21,977,910	25,701,375	85.5%
11	19,979,008	19,678,106	101.5%	10,222,945	9,680,309	105.6%	30,201,953	29,358,415	102.9%
12	21,436,840	21,758,653	98.5%	9,602,448	10,259,360	93.6%	31,039,287	32,018,014	96.9%
13	23,873,876	23,636,122	101.0%	10,860,623	10,750,013	101.0%	34,734,499	34,386,136	101.0%
14	23,962,733	25,361,904	94.5%	11,078,848	11,088,453	99.9%	35,041,582	36,450,357	96.1%
15	27,800,789	27,371,470	101.6%	10,896,842	11,546,194	94.4%	38,697,631	38,917,664	99.4%
16	29,302,900	29,900,056	98.0%	11,319,283	12,356,100	91.6%	40,622,183	42,256,155	96.1%
17	30,529,534	32,971,464	92.6%	12,848,376	12,692,559	101.2%	43,377,910	45,664,022	95.0%
18	38,026,549	36,033,543	105.5%	13,858,816	12,922,997	107.2%	51,885,365	48,956,540	106.0%
19	37,363,589	35,117,248	106.4%	11,293,574	11,805,151	95.7%	48,657,163	46,922,399	103.7%
20	27,962,577	27,201,790	102.8%	10,703,221	8,357,522	128.1%	38,665,798	35,559,312	108.7%
21	15,693,682	16,850,558	93.1%	4,976,382	4,802,731	103.6%	20,670,064	21,653,288	95.5%
22	3,516,328	2,738,567	128.4%	1,550,522	854,859	181.4%	5,066,850	3,593,426	141.0%
Total	**386,385,840**	**388,247,051**	**99.5%**	**164,618,324**	**164,228,342**	**100.2%**	**551,004,164**	**552,475,394**	**99.7%**

SPLIT BY ISSUE AGE				
Issue Age	Actual	Expected	A/E	Claim Count
<53	1,038,927	1,497,067	69.4%	15
53-57	12,075,335	12,353,057	97.8%	135
58-62	67,938,593	66,991,688	101.4%	741
63-67	159,844,027	160,179,623	99.8%	2,033
68-72	165,831,688	165,987,063	99.9%	2,661
73-77	102,001,618	103,330,628	98.7%	1,961
78-82	37,747,811	37,519,658	100.6%	970
83+	4,526,165	4,616,611	98.0%	179
Total	**551,004,164**	**552,475,394**	**99.7%**	**8,695**

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

SUMMARY BY DURATION				
Duration	Actual Deaths	Expected Deaths	A/E	Difference
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
Total	**32,715**	**32,779**	**100%**	**(64)**

SUMMARY BY ISSUE AGE				
Issue Age	Actual Deaths	Expected Deaths	A/E	Difference
<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
Total	**32,715**	**32,779**	**100%**	**(64)**

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

EXHIBIT IV
RiverSource Life Insurance Company
Lapses and Benefit Reductions[1]
Nationwide Experience
Experience Includes All Long-Term Care Forms Combined

Additional Lapses Due to Rate Increase									
Increase Percent	Average Increase	Year of Increase							Weighted Average
		2005	2006	2007	2008	2009	2010	2011	
< 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%
Total	16.3%	2.6%	2.5%	1.3%	1.8%	1.9%	1.5%	1.4%	1.9%

Policies Choosing Reduction in Benefits in Relation to Rate Increase Percentage									
Increase Percent	Average Increase	Year of Increase							Weighted Average
		2005	2006	2007	2008	2009	2010	2011	
< 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%
Total	16.3%	1.4%	1.3%	0.8%	0.7%	0.8%	0.7%	0.8%	0.9%

[1] 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																
	Issue Ages 35-62				Issue Ages 63-72				Issue Ages 73+				All Issue Ages			
		Actual		Expected		Actual		Expected		Actual		Expected		Actual		Expected
Duration	Lapses	Exposure	Rate	Lapses	Lapses	Exposure	Rate	Lapses	Lapses	Exposure	Rate	Lapses	Lapses	Exposure	Rate	Lapses
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																
	Issue Ages 35-62				Issue Ages 63-72				Issue Ages 73+				All Issue Ages			
		Actual		Expected		Actual		Expected		Actual		Expected		Actual		Expected
Duration	Lapses	Exposure	Rate	Lapses	Lapses	Exposure	Rate	Lapses	Lapses	Exposure	Rate	Lapses	Lapses	Exposure	Rate	Lapses
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 2004 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2004 Rate Increase Filing Assumptions:

Mortality: 1983 Individual Annuitant Mortality Basic Table with selection.

Mortality Selection Factors

	Issue Age Band		
Duration	<66	63-72	73+
1	20%	20%	20%
2	25%	30%	25%
3	35%	50%	35%
4	55%	50%	40%
5	60%	50%	45%
6	60%	65%	75%
7	60%	65%	75%
8	75%	80%	80%
9	75%	80%	95%
10	75%	85%	95%
11	80%	85%	95%
12	80%	85%	95%
13	85%	90%	100%
14	85%	90%	100%
15	90%	95%	100%
16	90%	95%	100%
17	95%	100%	100%
18	95%	100%	100%
19	95%	100%	100%
20+	100%	100%	100%

EXHIBIT VI
RiverSource Life Insurance Company
Prior 2004 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2004 Rate Increase Filing Assumptions (cont):

Voluntary Lapse Rates:

Lifetime Benefit

	Issue Age Band		
Duration	<63	63-72	73+
1	7.0%	5.5%	3.5%
2	7.0%	5.5%	3.5%
3	5.5%	4.5%	3.5%
4	4.5%	3.0%	2.5%
5	3.0%	2.3%	2.0%
6	2.0%	1.8%	1.8%
7	1.5%	1.3%	1.5%
8	1.2%	1.2%	1.3%
9	1.0%	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%	0.9%	1.3%
17	0.9%	1.0%	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%

Non-Lifetime Benefit

	Issue Age Band		
Duration	<63	63-72	73+
1	6.0%	5.5%	4.0%
2	6.0%	4.5%	4.0%
3	5.0%	3.5%	3.7%
4	3.8%	3.0%	3.3%
5	2.8%	2.5%	2.6%
6	2.2%	2.2%	2.6%
7	1.6%	1.9%	2.6%
8	1.3%	1.5%	2.8%
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%	4.0%
13	1.2%	1.3%	4.0%
14	1.2%	1.3%	4.0%
15	1.2%	1.4%	4.0%
16	1.2%	1.6%	4.0%
17	1.2%	1.8%	4.0%
18	1.2%	2.1%	4.0%
19	1.2%	2.4%	4.0%
20	1.2%	2.7%	4.0%
21	1.2%	3.5%	4.0%
22	1.2%	3.7%	4.0%
23	1.2%	3.8%	4.0%
24	1.2%	3.9%	4.0%
25	1.4%	4.0%	4.0%
26	1.5%	4.0%	4.0%
27	1.6%	4.0%	4.0%
28	1.3%	4.0%	4.0%
29	1.5%	4.0%	4.0%
30	1.8%	4.0%	4.0%
31	2.0%	4.0%	4.0%
32	2.0%	4.0%	4.0%
33+	2.0%	4.0%	4.0%

In the year of rate increase notification to policyholders, an additional 5.0% of inforce policyholders is assumed to lapse.

EXHIBIT VI
RiverSource Life Insurance Company
Prior 2004 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2004 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 (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 2003.

Lifetime Benefit Actual-to-Expected Adjustment Factors

	Issue Age Band					
Duration	<58	58-62	63-67	68-72	73-77	78+
1	0.20	0.28	0.40	0.56	0.60	0.56
2	0.33	0.46	0.65	0.91	0.98	0.91
3	0.35	0.49	0.70	0.98	1.05	0.98
4	0.40	0.56	0.80	1.12	1.20	1.12
5	0.43	0.60	0.85	1.19	1.28	1.19
6	0.45	0.63	0.95	1.17	1.35	1.26
7	0.50	0.80	1.10	1.20	1.50	1.50
8	0.50	0.80	1.15	1.20	1.50	1.50
9	0.50	0.90	1.15	1.20	1.50	1.60
10	0.50	0.90	1.15	1.20	1.50	1.60
11	0.50	1.00	1.15	1.25	1.50	1.65
12	0.60	1.00	1.20	1.30	1.50	1.65
13	0.60	1.00	1.20	1.30	1.50	1.65
14	0.70	1.05	1.20	1.30	1.50	1.65
15	0.70	1.05	1.20	1.30	1.50	1.65
16	0.80	1.05	1.20	1.30	1.50	1.65
17	0.80	1.10	1.20	1.30	1.50	1.65
18	0.90	1.10	1.20	1.30	1.50	1.65
19	0.90	1.10	1.20	1.30	1.50	1.65
20	1.00	1.10	1.20	1.30	1.50	1.65
21	1.00	1.10	1.20	1.30	1.50	1.65
22	1.05	1.10	1.20	1.30	1.50	1.65
23	1.05	1.10	1.20	1.30	1.50	1.65
24	1.10	1.10	1.20	1.30	1.50	1.65
25+	1.10	1.10	1.20	1.30	1.50	1.65

EXHIBIT VI
RiverSource Life Insurance Company
Prior 2004 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2004 Rate Increase Filing Assumptions (cont):

Morbidity (continued): **Non-Lifetime Benefit Actual-to-Expected Adjustment Factors**

	Age at Issue						
Duration	<58	58-62	63-67	68-72	73-77	78-82	83+
1	0.04	0.08	0.20	0.32	0.36	0.56	1.85
2	0.07	0.13	0.33	0.52	0.59	0.91	1.85
3	0.14	0.21	0.35	0.56	0.67	0.98	1.85
4	0.16	0.24	0.40	0.72	0.76	1.16	1.90
5	0.26	0.34	0.43	0.77	0.85	1.23	1.90
6	0.27	0.36	0.45	0.81	0.95	1.31	1.90
7	0.40	0.50	0.60	0.90	1.10	1.45	1.95
8	0.40	0.50	0.60	0.90	1.15	1.45	1.95
9	0.50	0.60	0.70	1.00	1.20	1.45	1.95
10	0.50	0.60	0.70	1.00	1.25	1.50	1.95
11	0.50	0.60	0.70	1.10	1.30	1.50	1.95
12	0.60	0.70	0.80	1.10	1.35	1.50	1.95
13	0.60	0.70	0.80	1.10	1.35	1.50	1.95
14	0.60	0.70	0.80	1.20	1.35	1.50	1.95
15	0.60	0.70	0.90	1.20	1.35	1.50	1.95
16	0.70	0.80	0.90	1.20	1.35	1.50	1.95
17	0.70	0.80	1.00	1.20	1.35	1.50	1.95
18	0.70	0.80	1.00	1.20	1.35	1.50	1.95
19	0.70	0.80	1.00	1.20	1.35	1.50	1.95
20	0.80	0.90	1.00	1.20	1.35	1.50	1.95
21	0.80	0.90	1.00	1.20	1.35	1.50	1.95
22	0.80	0.90	1.00	1.20	1.35	1.50	1.95
23	0.90	0.90	1.00	1.20	1.35	1.50	1.95
24	0.90	0.90	1.00	1.20	1.35	1.50	1.95
25+	0.90	0.90	1.00	1.20	1.35	1.50	1.95

An adverse selection assumption of 5% in the year of the rate increase notification to policyholders grading down to 0% in the 6th year after rate increase notification was also assumed.

Interest Rate: 7.5%

EXHIBIT VII
RiverSource Life Insurance Company
Prior 2008 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2008 Rate Increase Filing Assumptions:

Mortality: 1983 Individual Annuitant Mortality Basic Table with selection.

Mortality Selection Factors

	Issue Age Band				
Duration	<60	60-64	65-69	70-74	75+
1	15%	20%	20%	30%	20%
2	30%	25%	20%	35%	20%
3	40%	45%	45%	40%	35%
4	40%	45%	50%	40%	40%
5	40%	45%	50%	40%	40%
6	50%	55%	60%	70%	75%
7	50%	55%	60%	70%	75%
8	50%	60%	65%	70%	75%
9	75%	75%	80%	85%	80%
10	75%	75%	80%	85%	80%
11	90%	75%	80%	85%	95%
12	90%	85%	90%	90%	100%
13	90%	85%	90%	90%	100%
14	95%	85%	90%	90%	100%
15	100%	85%	90%	100%	100%
16	100%	85%	90%	100%	100%
17	100%	100%	100%	100%	100%
18+	100%	100%	100%	100%	100%

EXHIBIT VII
RiverSource Life Insurance Company
Prior 2008 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2008 Rate Increase Filing Assumptions (cont)

Voluntary Lapse Rates:

Lifetime Benefit

	Issue Age Band		
Duration	<63	63-72	73+
1	7.0%	5.5%	3.5%
2	7.0%	5.5%	3.5%
3	5.5%	4.5%	3.5%
4	4.5%	3.0%	2.5%
5	2.6%	2.1%	2.0%
6	1.5%	1.7%	1.7%
7	1.3%	1.1%	1.3%
8	0.9%	1.1%	1.3%
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%	0.9%	1.3%
17	0.9%	1.0%	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%

Non-Lifetime Benefit

	Issue Age Band		
Duration	<63	63-72	73+
1	6.0%	5.5%	4.0%
2	6.0%	4.5%	4.0%
3	5.0%	3.5%	3.7%
4	3.8%	3.0%	3.3%
5	2.4%	2.0%	2.0%
6	1.8%	1.8%	2.0%
7	1.4%	1.6%	2.6%
8	1.2%	1.3%	2.8%
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%

An additional 2.5% of inforce policyholders was assumed to lapse plus a 2.5% reduction in benefits due to election of reduced benefit options in the year of rate increase notification to policyholders was also assumed.

EXHIBIT VII
RiverSource Life Insurance Company
Prior 2008 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2008 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 (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 December 2006.

Lifetime Benefit Actual-to-Expected Adjustment Factors

	Issue Age Band						
Duration	< 53	53-57	58-62	63-67	68-72	73-77	78+
1	0.50	0.50	0.70	0.85	1.60	1.60	1.40
2	0.50	0.50	0.70	0.85	1.60	1.60	1.40
3	0.50	0.50	0.70	0.85	1.60	1.60	1.40
4	0.50	0.50	0.70	0.85	1.60	1.50	1.40
5	0.50	0.50	0.70	0.85	1.60	1.30	1.40
6	0.50	0.50	0.70	1.10	1.30	1.30	1.65
7	0.50	0.50	0.80	1.15	1.20	1.30	1.65
8	0.50	0.50	0.80	1.25	1.20	1.40	1.65
9	0.50	0.60	0.80	1.25	1.20	1.40	1.65
10	0.50	0.60	0.80	1.25	1.20	1.40	1.45
11	0.50	0.60	1.05	1.25	1.25	1.40	1.45
12	0.60	0.60	1.05	1.25	1.40	1.40	1.45
13	0.60	0.60	1.10	1.25	1.40	1.40	1.45
14	0.60	0.70	1.10	1.20	1.40	1.35	1.45
15	0.60	0.70	1.10	1.20	1.40	1.35	1.45
16	0.60	0.85	1.10	1.20	1.40	1.35	1.45
17	0.60	0.85	1.10	1.20	1.40	1.35	1.45
18	0.60	0.95	1.10	1.20	1.30	1.35	1.45
19	0.70	0.95	1.10	1.20	1.30	1.35	1.45
20	0.70	1.10	1.10	1.20	1.30	1.35	1.45
21	0.85	1.10	1.10	1.20	1.30	1.35	1.45
22	0.85	1.10	1.10	1.20	1.30	1.35	1.45
23	0.95	1.10	1.10	1.20	1.30	1.35	1.45
24	0.95	1.10	1.10	1.20	1.30	1.35	1.45
25+	1.10	1.10	1.10	1.20	1.30	1.35	1.45

EXHIBIT VII
RiverSource Life Insurance Company
Prior 2008 Rate Increase Assumptions

Policy Forms: 30240-VA and 30240-VA1

Prior 2008 Rate Increase Filing Assumptions (cont)

Morbidity (continued): **Non-Lifetime Benefit Actual-to-Expected Adjustment Factors**

	Age at Issue							
Duration	< 53	53–57	58–62	63–67	68–72	73–77	78–82	83+
1	0.10	0.10	0.20	0.50	0.80	0.90	1.40	1.80
2	0.10	0.10	0.20	0.50	0.80	0.90	1.40	1.80
3	0.20	0.20	0.30	0.50	0.80	0.95	1.40	1.80
4	0.20	0.20	0.30	0.50	0.90	0.95	1.45	1.80
5	0.30	0.30	0.40	0.50	0.90	1.00	1.45	1.80
6	0.30	0.30	0.40	0.50	0.90	1.05	1.45	1.80
7	0.40	0.40	0.50	0.60	0.90	1.10	1.45	1.55
8	0.40	0.40	0.50	0.60	0.90	1.15	1.45	1.55
9	0.50	0.50	0.60	0.70	1.00	1.20	1.45	1.55
10	0.50	0.50	0.60	0.70	1.00	1.25	1.50	1.55
11	0.50	0.50	0.60	0.70	1.10	1.30	1.50	1.55
12	0.50	0.60	0.70	0.80	1.10	1.35	1.50	1.55
13	0.50	0.60	0.70	0.80	1.10	1.35	1.50	1.55
14	0.50	0.60	0.70	0.80	1.20	1.35	1.50	1.55
15	0.50	0.60	0.70	0.90	1.20	1.35	1.50	1.55
16	0.50	0.60	0.70	0.90	1.20	1.35	1.50	1.55
17	0.60	0.70	0.80	1.00	1.20	1.35	1.50	1.55
18	0.60	0.70	0.80	1.00	1.20	1.35	1.50	1.55
19	0.60	0.70	0.80	1.00	1.20	1.35	1.50	1.55
20	0.60	0.70	0.90	1.00	1.20	1.35	1.50	1.55
21	0.60	0.70	0.90	1.00	1.20	1.35	1.50	1.55
22	0.70	0.80	0.90	1.00	1.20	1.35	1.50	1.55
23	0.70	0.80	0.90	1.00	1.20	1.35	1.50	1.55
24	0.70	0.80	0.90	1.00	1.20	1.35	1.50	1.55
25	0.70	0.90	0.90	1.00	1.20	1.35	1.50	1.55
26	0.70	0.90	0.90	1.00	1.20	1.35	1.50	1.55
27+	0.80	0.90	0.90	1.00	1.20	1.35	1.50	1.55

An adverse selection assumption of 5% in the year of the rate increase notification to policyholders grading down to 0% in the 6th year after rate increase notification was also assumed.

Interest Rate: 4.5%

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Form: 30240-VA and 30240-VA1

Prior 2011 Rate Increase Filing Assumptions:

Mortality: 1983 Individual Annuitant Mortality Basic Table with selection.

Mortality Selection Factors

	Issue Age Band					
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 VIII
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Form: 30240-VA and 30240-VA1

Prior 2011 Rate Increase Filing Assumptions (cont):

Voluntary Lapse Rates:

Lifetime Benefit

	Issue Age Band		
Duration	<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%

Non-Lifetime Benefit

	Issue Age Band		
Duration	<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%

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.

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Form: 30240-VA and 30240-VA1

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

	Issue Age Band							
Duration	<48	48-52	53–57	58–62	63–67	68–72	73–77	78+
1	0.45	0.45	0.40	0.80	0.80	1.50	1.80	1.50
2	0.28	0.45	0.40	0.80	0.80	1.50	1.80	1.50
3	0.26	0.45	0.40	0.80	0.80	1.50	1.80	1.50
4	0.23	0.45	0.40	0.80	0.80	1.50	1.80	1.50
5	0.21	0.45	0.40	0.80	0.80	1.50	1.80	1.50
6	0.20	0.45	0.40	0.80	1.00	1.50	1.80	1.50
7	0.29	0.45	0.40	0.80	1.00	1.15	1.30	1.80
8	0.32	0.45	0.40	0.80	1.35	1.15	1.30	1.80
9	0.36	0.45	0.40	0.90	1.35	1.15	1.30	1.35
10	0.38	0.45	0.75	0.90	1.35	1.15	1.30	1.35
11	0.41	0.45	0.75	0.90	1.35	1.35	1.30	1.35
12	0.45	0.45	0.75	0.90	1.35	1.40	1.30	1.50
13	0.45	0.45	0.75	1.10	1.35	1.40	1.30	1.55
14	0.45	0.45	0.75	1.20	1.35	1.40	1.30	1.55
15	0.45	0.45	0.75	1.40	1.35	1.55	1.30	1.55
16	0.45	0.45	0.75	1.40	1.35	1.55	1.30	1.55
17	0.45	0.50	0.80	1.40	1.50	1.55	1.40	1.55
18	0.45	0.60	1.15	1.40	1.50	1.55	1.40	1.55
19	0.45	0.70	1.15	1.40	1.50	1.55	1.45	1.55
20	0.45	0.70	1.15	1.40	1.50	1.55	1.45	1.55
21	0.45	0.85	1.15	1.40	1.50	1.55	1.45	1.55
22	0.50	0.85	1.15	1.40	1.50	1.55	1.45	1.55
23	0.60	0.95	1.15	1.40	1.50	1.55	1.45	1.55
24	0.70	0.95	1.15	1.40	1.50	1.55	1.45	1.55
25	0.70	1.00	1.15	1.40	1.50	1.55	1.45	1.55
26	0.85	1.00	1.15	1.40	1.50	1.55	1.45	1.55
27	0.85	1.10	1.15	1.40	1.50	1.55	1.45	1.55
28	0.95	1.10	1.15	1.40	1.50	1.55	1.45	1.55
29	0.95	1.10	1.15	1.40	1.50	1.55	1.45	1.55
30	1.00	1.10	1.15	1.40	1.50	1.55	1.45	1.55
31	1.00	1.10	1.15	1.40	1.50	1.55	1.45	1.55
32+	1.10	1.10	1.15	1.40	1.50	1.55	1.45	1.55

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Form: 30240-VA and 30240-VA1

Prior 2011 Rate Increase Filing Assumptions (cont):

Morbidity (continued):

Non-Lifetime Benefit Actual-to-Expected Adjustment Factors

	Age at Issue								
Duration	**<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	0.30	0.75	0.85	1.40	1.80
2	0.06	0.10	0.10	0.20	0.30	0.75	0.85	1.40	1.80
3	0.06	0.10	0.10	0.20	0.30	0.75	0.85	1.40	1.80
4	0.05	0.10	0.10	0.30	0.50	0.85	0.95	1.40	1.80
5	0.05	0.20	0.20	0.30	0.50	0.85	0.95	1.40	1.80
6	0.04	0.20	0.20	0.50	0.50	0.85	0.95	1.40	1.80
7	0.07	0.20	0.20	0.60	0.50	0.85	0.95	1.40	1.70
8	0.07	0.20	0.20	0.60	0.50	0.85	1.00	1.40	1.70
9	0.08	0.30	0.30	0.60	0.65	0.85	1.25	1.40	1.55
10	0.17	0.30	0.30	0.60	0.65	0.85	1.25	1.40	1.55
11	0.18	0.30	0.40	0.60	0.65	1.10	1.25	1.40	1.55
12	0.20	0.30	0.40	0.60	1.00	1.10	1.25	1.40	1.55
13	0.20	0.30	0.50	0.60	1.10	1.10	1.25	1.40	1.55
14	0.30	0.40	0.50	0.85	1.10	1.10	1.25	1.40	1.55
15	0.30	0.40	0.50	0.85	1.10	1.20	1.25	1.40	1.55
16	0.30	0.40	0.50	0.85	1.10	1.40	1.25	1.45	1.55
17	0.30	0.60	0.60	0.85	1.10	1.40	1.30	1.50	1.55
18	0.30	0.60	0.70	1.00	1.10	1.40	1.30	1.50	1.55
19	0.40	0.60	0.70	1.00	1.10	1.40	1.30	1.50	1.55
20	0.40	0.60	0.70	1.00	1.10	1.40	1.30	1.50	1.55
21	0.40	0.60	0.70	1.00	1.10	1.40	1.30	1.50	1.55
22	0.60	0.60	0.80	1.00	1.10	1.40	1.30	1.50	1.55
23	0.60	0.70	0.80	1.00	1.10	1.40	1.30	1.50	1.55
24	0.60	0.70	0.80	1.00	1.10	1.40	1.30	1.50	1.55
25	0.60	0.70	0.90	1.00	1.10	1.40	1.30	1.50	1.55
26	0.60	0.70	0.90	1.00	1.10	1.40	1.30	1.50	1.55
27	0.60	0.80	0.90	1.00	1.10	1.40	1.30	1.50	1.55
28	0.70	0.80	0.90	1.00	1.10	1.40	1.30	1.50	1.55
29	0.70	0.80	0.90	1.00	1.10	1.40	1.30	1.50	1.55
30	0.70	0.90	0.90	1.00	1.10	1.40	1.30	1.50	1.55
31	0.70	0.90	1.00	1.00	1.10	1.40	1.30	1.50	1.55
32	0.80	0.90	1.00	1.00	1.10	1.40	1.30	1.50	1.55
33	0.80	0.95	1.00	1.00	1.10	1.40	1.30	1.50	1.55
34	0.80	0.95	1.00	1.00	1.10	1.40	1.30	1.50	1.55
35	0.90	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
36	0.90	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
37	0.90	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
38	0.95	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
39	0.95	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55
40+	1.00	1.00	1.00	1.00	1.10	1.40	1.30	1.50	1.55

The following adverse selection factors are used:

Year of Policyholder Notification *	Without Current Requested Increase	With Current Requested Increase
1	0.0%	2.8%
2	0.0%	1.8%
3	0.0%	0.8%
4	0.0%	0.0%

* For currently requested increase

Interest Rate: 7.5%

EXHIBIT IX
RiverSource Life Insurance Company
Nationwide Experience Projections with No Increase
Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis
Policy Form: 30240

			Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest						
	Calendar Year	Ending Policies Inforce	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
Historical Experience	1989	3,532	477,819	0	0	0.0%	0.0%	2,662,038	0	0	0.0%	0.0%	7.50%	5.5712
	1990	20,231	11,323,037	1,232	1,155	0.0%	0.0%	58,682,081	6,383	5,984	0.0%	0.0%	7.50%	5.1825
	1991	33,057	23,730,033	1,944	3,294,975	0.0%	13.9%	114,401,690	9,371	15,884,962	0.0%	13.9%	7.50%	4.8210
	1992	44,591	34,448,430	1,690,119	6,171,474	4.9%	17.9%	154,488,113	7,579,543	27,676,713	4.9%	17.9%	7.50%	4.4846
	1993	45,706	40,970,649	3,222,626	8,891,377	7.9%	21.7%	170,918,871	13,443,955	37,092,508	7.9%	21.7%	7.50%	4.1717
	1994	43,660	39,420,810	5,892,071	9,855,045	14.9%	25.0%	152,979,856	22,865,288	38,244,354	14.9%	25.0%	7.50%	3.8807
	1995	41,935	37,637,454	7,837,584	11,266,955	20.8%	29.9%	135,869,031	28,293,224	40,673,056	20.8%	29.9%	7.50%	3.6099
	1996	40,338	36,134,012	10,249,636	15,624,614	28.4%	43.2%	121,341,110	34,419,158	52,468,792	28.4%	43.2%	7.50%	3.3581
	1997	38,927	34,589,007	13,065,641	17,780,628	37.8%	51.4%	108,049,164	40,814,459	55,543,137	37.8%	51.4%	7.50%	3.1238
	1998	37,079	33,122,919	15,916,595	19,443,305	48.1%	58.7%	96,250,601	46,251,415	56,499,544	48.1%	58.7%	7.50%	2.9059
	1999	35,367	31,290,387	18,384,152	22,760,137	58.8%	72.7%	84,581,877	49,694,690	61,523,530	58.8%	72.7%	7.50%	2.7031
	2000	33,954	29,843,654	21,429,396	26,669,331	71.8%	89.4%	75,042,952	53,884,995	67,061,002	71.8%	89.4%	7.50%	2.5145
	2001	32,530	28,399,995	25,397,653	26,494,505	89.4%	93.3%	66,430,531	59,407,740	61,973,391	89.4%	93.3%	7.50%	2.3391
	2002	31,025	26,899,593	27,614,437	30,544,425	102.7%	113.5%	58,531,102	60,086,539	66,461,930	102.7%	113.5%	7.50%	2.1759
	2003	29,613	25,356,832	30,295,561	33,084,721	119.5%	130.5%	51,324,830	61,321,325	66,966,870	119.5%	130.5%	7.50%	2.0241
	2004	28,223	23,927,805	34,061,195	38,627,557	142.3%	161.4%	45,053,332	64,133,353	72,731,292	142.3%	161.4%	7.50%	1.8829
	2005	26,280	21,567,058	37,788,114	41,667,455	175.2%	193.2%	37,775,177	66,186,713	72,981,464	175.2%	193.2%	7.50%	1.7515
	2006	24,689	21,676,207	39,456,399	40,389,114	182.0%	186.3%	35,317,538	64,287,211	65,806,904	182.0%	186.3%	7.50%	1.6293
	2007	23,248	23,466,443	42,827,475	46,146,562	182.5%	196.6%	35,566,894	64,911,425	69,941,995	182.5%	196.6%	7.50%	1.5156
	2008	21,729	21,827,751	46,609,785	52,689,538	213.5%	241.4%	30,775,080	65,715,423	74,287,304	213.5%	241.4%	7.50%	1.4099
	2009	20,116	20,383,511	53,209,364	54,558,958	261.0%	267.7%	26,733,802	69,786,241	71,556,288	261.0%	267.7%	7.50%	1.3115
	2010	18,627	20,581,446	59,151,098	53,964,474	287.4%	262.2%	25,110,141	72,166,573	65,838,696	287.4%	262.2%	7.50%	1.2200
	2011	17,139	18,860,305	61,386,135	56,695,958	325.5%	300.6%	21,404,916	69,668,282	64,345,312	325.5%	300.6%	7.50%	1.1349
	2012	15,757	18,216,181	62,949,458	55,888,139	345.6%	306.8%	19,231,523	66,458,165	59,003,259	345.6%	306.8%	7.50%	1.0557
	1/2013-3/2013	15,465	4,673,528	16,085,355	17,202,549	344.2%	368.1%	4,715,969	16,231,428	17,358,767	344.2%	368.1%	7.50%	1.0091
Projected Future Experience	4/2013-12/2013	14,382	13,692,096	43,599,017	41,974,539	318.4%	306.6%	13,325,753	42,432,490	40,851,477	318.4%	306.6%	7.50%	0.9732
	2014	13,051	16,584,185	50,237,740	55,154,576	302.9%	332.6%	15,150,730	45,895,438	50,387,286	302.9%	332.6%	7.50%	0.9136
	2015	11,762	14,759,253	54,470,277	53,734,057	369.1%	364.1%	12,542,824	46,290,358	45,664,698	369.1%	364.1%	7.50%	0.8498
	2016	10,527	13,040,884	57,950,925	51,992,724	444.4%	398.7%	10,309,308	45,812,381	41,102,200	444.4%	398.7%	7.50%	0.7905
	2017	9,356	11,439,781	59,162,693	50,058,092	517.2%	437.6%	8,412,629	43,507,282	36,811,907	517.2%	437.6%	7.50%	0.7354
	2018	8,257	9,964,014	58,414,409	47,693,497	586.3%	478.7%	6,816,162	39,960,006	32,626,067	586.3%	478.7%	7.50%	0.6841
	2019	7,231	8,614,732	57,125,955	44,945,532	663.1%	521.7%	5,481,998	36,352,189	28,601,158	663.1%	521.7%	7.50%	0.6364
	2020	6,280	7,388,384	55,337,391	41,860,742	749.0%	566.6%	4,373,590	32,757,241	24,779,672	749.0%	566.6%	7.50%	0.5920
	2021	5,408	6,284,625	52,963,625	38,490,461	842.7%	612.5%	3,460,665	29,164,724	21,194,993	842.7%	612.5%	7.50%	0.5507
	2022	4,616	5,300,335	50,000,963	34,946,842	943.4%	659.3%	2,715,032	25,612,388	17,901,097	943.4%	659.3%	7.50%	0.5122
	2023	3,906	4,432,233	46,585,559	31,336,583	1051.1%	707.0%	2,111,961	22,198,036	14,931,893	1051.1%	707.0%	7.50%	0.4765
	2024	3,275	3,674,051	42,819,885	27,704,183	1165.5%	754.1%	1,628,546	18,980,178	12,280,050	1165.5%	754.1%	7.50%	0.4433
	2025	2,719	3,018,345	38,816,254	24,191,165	1286.0%	801.5%	1,244,558	16,005,157	9,974,775	1286.0%	801.5%	7.50%	0.4123
	2026	2,236	2,456,701	34,803,182	20,863,831	1416.7%	849.3%	942,302	13,349,248	8,002,615	1416.7%	849.3%	7.50%	0.3836
	2027	1,819	1,979,794	31,055,019	17,768,193	1568.6%	897.5%	706,398	11,080,547	6,339,758	1568.6%	897.5%	7.50%	0.3568
	2028	1,464	1,579,736	27,405,850	14,940,896	1734.8%	945.8%	524,331	9,096,288	4,959,039	1734.8%	945.8%	7.50%	0.3319
	2029	1,167	1,248,081	23,916,748	12,401,713	1916.3%	993.7%	385,350	7,384,389	3,829,077	1916.3%	993.7%	7.50%	0.3088
	2030	919	975,989	20,639,011	10,155,325	2114.7%	1040.5%	280,317	5,927,791	2,916,741	2114.7%	1040.5%	7.50%	0.2872
	2031	716	755,097	17,609,542	8,195,896	2332.1%	1085.4%	201,743	4,704,826	2,189,737	2332.1%	1085.4%	7.50%	0.2672
	2032	551	577,714	14,851,149	6,509,114	2570.7%	1126.7%	143,582	3,691,026	1,617,741	2570.7%	1126.7%	7.50%	0.2485
	2033	419	436,875	12,374,966	5,082,372	2832.6%	1163.3%	101,003	2,861,031	1,175,019	2832.6%	1163.3%	7.50%	0.2312
	2034	314	326,361	10,183,807	3,899,540	3120.4%	1194.9%	70,189	2,190,183	838,655	3120.4%	1194.9%	7.50%	0.2151
	2035	232	240,704	8,274,423	2,940,554	3437.6%	1221.6%	48,155	1,655,386	588,289	3437.6%	1221.6%	7.50%	0.2001
	2036	169	175,159	6,636,015	2,178,904	3788.6%	1244.0%	32,598	1,234,982	405,500	3788.6%	1244.0%	7.50%	0.1861
	2037	122	125,672	5,252,532	1,589,763	4179.6%	1265.0%	21,756	909,313	275,218	4179.6%	1265.0%	7.50%	0.1731
	2038	86	88,829	4,103,344	1,141,973	4619.4%	1285.6%	14,305	660,806	183,904	4619.4%	1285.6%	7.50%	0.1610
	2039	60	61,797	3,163,733	806,890	5119.6%	1305.7%	9,257	473,945	120,877	5119.6%	1305.7%	7.50%	0.1498
	2040	41	42,265	2,407,108	560,161	5695.3%	1325.4%	5,890	335,440	78,061	5695.3%	1325.4%	7.50%	0.1394
	2041	27	28,377	1,806,844	381,525	6367.3%	1344.5%	3,679	234,224	49,458	6367.3%	1344.5%	7.50%	0.1296
	2042	18	18,670	1,337,628	254,480	7164.5%	1363.0%	2,251	161,301	30,687	7164.5%	1363.0%	7.50%	0.1206
	2043	11	12,010	976,290	165,848	8129.0%	1380.9%	1,347	109,515	18,604	8129.0%	1380.9%	7.50%	0.1122
	2044	7	7,532	702,227	105,309	9322.7%	1398.1%	786	73,276	10,989	9322.7%	1398.1%	7.50%	0.1043
	2045	4	4,590	497,562	64,925	10839.2%	1414.4%	446	48,297	6,302	10839.2%	1414.4%	7.50%	0.0971
	2046	2	2,707	347,117	38,698	12823.6%	1429.6%	244	31,343	3,494	12823.6%	1429.6%	7.50%	0.0903
	2047	1	1,537	238,296	22,184	15508.3%	1443.7%	129	20,016	1,863	15508.3%	1443.7%	7.50%	0.0840
	2048	1	834	160,869	12,151	19281.5%	1456.4%	65	12,570	949	19281.5%	1456.4%	7.50%	0.0781
	2049	0	430	106,703	6,309	24821.9%	1467.6%	31	7,756	459	24821.9%	1467.6%	7.50%	0.0727
	2050	0	208	69,467	3,073	33388.3%	1477.1%	14	4,697	208	33388.3%	1477.1%	7.50%	0.0676
	2051	0	93	44,339	1,387	47480.6%	1484.7%	6	2,789	87	47480.6%	1484.7%	7.50%	0.0629
	2052	0	38	27,711	570	72511.6%	1490.4%	2	1,621	33	72511.6%	1490.4%	7.50%	0.0585
	Past		628,824,867	634,523,026	689,712,948	100.9%	109.7%	1,733,238,220	1,097,622,897	1,281,927,053	63.3%	74.0%		
	Future		129,340,717	896,476,174	654,174,577	693.1%	505.8%	91,069,932	511,230,475	410,750,639	561.4%	451.0%		
	Lifetime		758,165,584	1,530,999,201	1,343,887,525	201.9%	177.3%	1,824,308,152	1,608,853,373	1,692,677,693	88.2%	92.8%		

EXHIBIT IX
RiverSource Life Insurance Company
Nationwide Experience Projections with 20% Increase
Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis
Policy Form: 30240

			Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest						
	Calendar Year	Ending Policies Inforce	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
Historical Experience	1989	3,532	477,819	0	0	0.0%	0.0%	2,662,038	0	0	0.0%	0.0%	7.50%	5.5712
	1990	20,231	11,323,037	1,232	1,155	0.0%	0.0%	58,682,081	6,383	5,984	0.0%	0.0%	7.50%	5.1825
	1991	33,057	23,730,033	1,944	3,294,975	0.0%	13.9%	114,401,690	9,371	15,884,962	0.0%	13.9%	7.50%	4.8210
	1992	44,591	34,448,430	1,690,119	6,171,474	4.9%	17.9%	154,488,113	7,579,543	27,676,713	4.9%	17.9%	7.50%	4.4846
	1993	45,706	40,970,649	3,222,626	8,891,377	7.9%	21.7%	170,918,871	13,443,955	37,092,508	7.9%	21.7%	7.50%	4.1717
	1994	43,660	39,420,810	5,892,071	9,855,045	14.9%	25.0%	152,979,856	22,865,288	38,244,354	14.9%	25.0%	7.50%	3.8807
	1995	41,935	37,637,454	7,837,584	11,266,955	20.8%	29.9%	135,869,031	28,293,224	40,673,056	20.8%	29.9%	7.50%	3.6099
	1996	40,338	36,134,012	10,249,636	15,624,614	28.4%	43.2%	121,341,110	34,419,158	52,468,792	28.4%	43.2%	7.50%	3.3581
	1997	38,927	34,589,007	13,065,641	17,780,628	37.8%	51.4%	108,049,164	40,814,459	55,543,137	37.8%	51.4%	7.50%	3.1238
	1998	37,079	33,122,919	15,916,595	19,443,305	48.1%	58.7%	96,250,601	46,251,415	56,499,544	48.1%	58.7%	7.50%	2.9059
	1999	35,367	31,290,387	18,384,152	22,760,137	58.8%	72.7%	84,581,877	49,694,690	61,523,530	58.8%	72.7%	7.50%	2.7031
	2000	33,954	29,843,654	21,429,396	26,669,331	71.8%	89.4%	75,042,952	53,884,995	67,061,002	71.8%	89.4%	7.50%	2.5145
	2001	32,530	28,399,995	25,397,653	26,494,505	89.4%	93.3%	66,430,531	59,407,740	61,973,391	89.4%	93.3%	7.50%	2.3391
	2002	31,025	26,899,593	27,614,437	30,544,425	102.7%	113.5%	58,531,102	60,086,539	66,461,930	102.7%	113.5%	7.50%	2.1759
	2003	29,613	25,356,832	30,295,561	33,084,721	119.5%	130.5%	51,324,830	61,321,325	66,966,870	119.5%	130.5%	7.50%	2.0241
	2004	28,223	23,927,805	34,061,195	38,627,557	142.3%	161.4%	45,053,332	64,133,353	72,731,292	142.3%	161.4%	7.50%	1.8829
	2005	26,280	21,567,058	37,788,114	41,667,455	175.2%	193.2%	37,775,177	66,186,713	72,981,464	175.2%	193.2%	7.50%	1.7515
	2006	24,689	21,676,207	39,456,399	40,389,114	182.0%	186.3%	35,317,538	64,287,211	65,806,904	182.0%	186.3%	7.50%	1.6293
	2007	23,248	23,466,443	42,827,475	46,146,562	182.5%	196.6%	35,566,894	64,911,425	69,941,995	182.5%	196.6%	7.50%	1.5156
	2008	21,729	21,827,751	46,609,785	52,689,538	213.5%	241.4%	30,775,080	65,715,423	74,287,304	213.5%	241.4%	7.50%	1.4099
	2009	20,116	20,383,511	53,209,364	54,558,958	261.0%	267.7%	26,733,802	69,786,241	71,556,288	261.0%	267.7%	7.50%	1.3115
	2010	18,627	20,581,446	59,151,098	53,964,474	287.4%	262.2%	25,110,141	72,166,573	65,838,696	287.4%	262.2%	7.50%	1.2200
	2011	17,139	18,860,305	61,386,135	56,695,958	325.5%	300.6%	21,404,916	69,668,282	64,345,312	325.5%	300.6%	7.50%	1.1349
	2012	15,757	18,216,181	62,949,458	55,888,139	345.6%	306.8%	19,231,523	66,458,165	59,003,259	345.6%	306.8%	7.50%	1.0557
	1/2013-3/2013	15,465	4,673,528	16,085,355	17,202,549	344.2%	368.1%	4,715,969	16,231,428	17,358,767	344.2%	368.1%	7.50%	1.0091
Projected Future Experience	4/2013-12/2013	14,357	13,692,096	43,598,983	41,966,966	318.4%	306.5%	13,325,753	42,432,457	40,844,106	318.4%	306.5%	7.50%	0.9732
	2014	12,788	18,114,374	50,204,777	54,945,862	277.2%	303.3%	16,548,656	45,865,324	50,196,612	277.2%	303.3%	7.50%	0.9136
	2015	11,525	17,216,241	54,378,689	53,492,030	315.9%	310.7%	14,630,841	46,212,524	45,459,016	315.9%	310.7%	7.50%	0.8498
	2016	10,315	15,211,828	57,783,065	51,507,662	379.9%	338.6%	12,025,521	45,679,681	40,718,740	379.9%	338.6%	7.50%	0.7905
	2017	9,168	13,344,203	58,832,806	49,147,575	440.9%	368.3%	9,813,110	43,264,689	36,142,328	440.9%	368.3%	7.50%	0.7354
	2018	8,091	11,622,779	57,858,222	46,621,258	497.8%	401.1%	7,950,886	39,579,531	31,892,572	497.8%	401.1%	7.50%	0.6841
	2019	7,085	10,048,895	56,385,677	43,924,386	561.1%	437.1%	6,394,630	35,881,112	27,951,351	561.1%	437.1%	7.50%	0.6364
	2020	6,153	8,618,406	54,477,093	40,900,074	632.1%	474.6%	5,101,708	32,247,983	24,211,000	632.1%	474.6%	7.50%	0.5920
	2021	5,299	7,330,909	52,039,664	37,598,702	709.9%	512.9%	4,036,807	28,655,940	20,703,941	709.9%	512.9%	7.50%	0.5507
	2022	4,523	6,182,763	49,057,934	34,129,826	793.5%	552.0%	3,167,046	25,129,333	17,482,590	793.5%	552.0%	7.50%	0.5122
	2023	3,827	5,170,146	45,652,759	30,597,671	883.0%	591.8%	2,463,576	21,753,557	14,579,801	883.0%	591.8%	7.50%	0.4765
	2024	3,209	4,285,744	41,918,856	27,045,710	978.1%	631.1%	1,899,682	18,580,791	11,988,178	978.1%	631.1%	7.50%	0.4433
	2025	2,665	3,520,876	37,964,075	23,611,878	1078.3%	670.6%	1,451,767	15,653,777	9,735,916	1078.3%	670.6%	7.50%	0.4123
	2026	2,191	2,865,728	34,012,584	20,360,721	1186.9%	710.5%	1,099,190	13,046,003	7,809,640	1186.9%	710.5%	7.50%	0.3836
	2027	1,782	2,309,423	30,334,597	17,336,953	1313.5%	750.7%	824,011	10,823,497	6,185,889	1313.5%	750.7%	7.50%	0.3568
	2028	1,435	1,842,759	26,760,343	14,576,115	1452.2%	791.0%	611,631	8,882,037	4,837,965	1452.2%	791.0%	7.50%	0.3319
	2029	1,143	1,455,886	23,347,601	12,097,280	1603.7%	830.9%	449,510	7,208,663	3,735,083	1603.7%	830.9%	7.50%	0.3088
	2030	901	1,138,491	20,144,434	9,904,806	1769.4%	870.0%	326,989	5,785,742	2,844,788	1769.4%	870.0%	7.50%	0.2872
	2031	702	880,822	17,185,159	7,992,814	1951.0%	907.4%	235,333	4,591,442	2,135,479	1951.0%	907.4%	7.50%	0.2672
	2032	540	673,905	14,491,369	6,347,186	2150.4%	941.9%	167,489	3,601,608	1,577,496	2150.4%	941.9%	7.50%	0.2485
	2033	410	509,616	12,073,720	4,955,488	2369.2%	972.4%	117,821	2,791,385	1,145,684	2369.2%	972.4%	7.50%	0.2312
	2034	308	380,702	9,934,783	3,801,875	2609.6%	998.6%	81,876	2,136,626	817,651	2609.6%	998.6%	7.50%	0.2151
	2035	228	280,782	8,071,248	2,866,695	2874.6%	1021.0%	56,174	1,614,739	573,513	2874.6%	1021.0%	7.50%	0.2001
	2036	166	204,324	6,472,446	2,124,032	3167.7%	1039.5%	38,025	1,204,541	395,289	3167.7%	1039.5%	7.50%	0.1861
	2037	119	146,597	5,122,613	1,549,631	3494.4%	1057.1%	25,379	886,822	268,271	3494.4%	1057.1%	7.50%	0.1731
	2038	84	103,619	4,001,529	1,113,081	3861.8%	1074.2%	16,687	644,410	179,252	3861.8%	1074.2%	7.50%	0.1610
	2039	58	72,086	3,085,005	786,434	4279.6%	1091.0%	10,799	462,151	117,812	4279.6%	1091.0%	7.50%	0.1498
	2040	40	49,302	2,347,048	545,933	4760.6%	1107.3%	6,870	327,071	76,078	4760.6%	1107.3%	7.50%	0.1394
	2041	27	33,102	1,761,652	371,819	5321.9%	1123.3%	4,291	228,366	48,199	5321.9%	1123.3%	7.50%	0.1296
	2042	17	21,779	1,304,096	247,996	5987.9%	1138.7%	2,626	157,258	29,905	5987.9%	1138.7%	7.50%	0.1206
	2043	11	14,010	951,765	161,617	6793.6%	1153.6%	1,572	106,764	18,129	6793.6%	1153.6%	7.50%	0.1122
	2044	7	8,787	684,554	102,620	7790.9%	1167.9%	917	71,432	10,708	7790.9%	1167.9%	7.50%	0.1043
	2045	4	5,355	485,018	63,265	9057.8%	1181.5%	520	47,080	6,141	9057.8%	1181.5%	7.50%	0.0971
	2046	2	3,158	338,352	37,709	10715.6%	1194.2%	285	30,552	3,405	10715.6%	1194.2%	7.50%	0.0903
	2047	1	1,792	232,271	21,616	12958.6%	1206.0%	151	19,510	1,816	12958.6%	1206.0%	7.50%	0.0840
	2048	1	973	156,796	11,840	16110.9%	1216.6%	76	12,251	925	16110.9%	1216.6%	7.50%	0.0781
	2049	0	501	103,998	6,147	20739.6%	1225.9%	36	7,559	447	20739.6%	1225.9%	7.50%	0.0727
	2050	0	243	67,704	2,994	27896.3%	1233.8%	16	4,578	202	27896.3%	1233.8%	7.50%	0.0676
	2051	0	109	43,213	1,351	39669.6%	1240.2%	7	2,718	85	39669.6%	1240.2%	7.50%	0.0629
	2052	0	45	27,007	555	60581.5%	1244.9%	3	1,580	32	60581.5%	1244.9%	7.50%	0.0585
	Past		628,824,867	634,523,026	689,712,948	100.9%	109.7%	1,733,238,220	1,097,622,897	1,281,927,053	63.3%	74.0%		
	Future		147,363,153	883,693,507	642,878,173	599.7%	436.3%	102,888,267	505,633,083	404,726,037	491.4%	393.4%		
	Lifetime		776,188,020	1,518,216,533	1,332,591,122	195.6%	171.7%	1,836,126,487	1,603,255,980	1,686,653,090	87.3%	91.9%		

EXHIBIT X
RiverSource Life Insurance Company
Virginia Experience Projections with No Increase
Policy Forms: 30240-VA and 30240-VA1

			Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest						
	Calendar Year	Ending Policies Inforce	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
	1989	97	12,930	0	0	0.0%	0.0%	72,034	0	0	0.0%	0.0%	7.50%	5.5712
	1990	506	281,227	0	0	0.0%	0.0%	1,457,472	0	0	0.0%	0.0%	7.50%	5.1825
	1991	806	545,656	0	0	0.0%	0.0%	2,630,589	0	0	0.0%	0.0%	7.50%	4.8210
	1992	1,107	805,015	0	49,943	0.0%	6.2%	3,610,187	0	223,974	0.0%	6.2%	7.50%	4.4846
	1993	1,134	977,851	32,163	23,317	3.3%	2.4%	4,079,339	134,175	97,272	3.3%	2.4%	7.50%	4.1717
	1994	1,081	928,315	90,262	386,822	9.7%	41.7%	3,602,501	350,279	1,501,136	9.7%	41.7%	7.50%	3.8807
	1995	1,053	897,829	165,157	518,937	18.4%	57.8%	3,241,110	596,207	1,873,331	18.4%	57.8%	7.50%	3.6099
	1996	1,021	873,314	279,475	2,242	32.0%	0.3%	2,932,662	938,500	7,528	32.0%	0.3%	7.50%	3.3581
	1997	991	840,512	263,453	578,394	31.3%	68.8%	2,625,591	822,976	1,806,789	31.3%	68.8%	7.50%	3.1238
Historical	1998	930	801,303	331,945	276,031	41.4%	34.4%	2,328,476	964,586	802,109	41.4%	34.4%	7.50%	2.9059
Experience	1999	895	756,673	393,906	859,750	52.1%	113.6%	2,045,384	1,064,777	2,324,013	52.1%	113.6%	7.50%	2.7031
	2000	863	727,942	637,070	1,540,439	87.5%	211.6%	1,830,436	1,601,937	3,873,490	87.5%	211.6%	7.50%	2.5145
	2001	832	693,976	901,170	984,009	129.9%	141.8%	1,623,282	2,107,929	2,301,699	129.9%	141.8%	7.50%	2.3391
	2002	799	660,626	842,176	419,803	127.5%	63.5%	1,437,462	1,832,499	913,453	127.5%	63.5%	7.50%	2.1759
	2003	765	623,380	775,958	684,644	124.5%	109.8%	1,261,786	1,570,618	1,385,791	124.5%	109.8%	7.50%	2.0241
	2004	735	596,869	850,337	1,013,967	142.5%	169.9%	1,123,836	1,601,087	1,909,184	142.5%	169.9%	7.50%	1.8829
	2005	698	563,947	954,720	1,227,484	169.3%	217.7%	987,766	1,672,213	2,149,964	169.3%	217.7%	7.50%	1.7515
	2006	659	570,833	1,148,821	1,555,807	201.3%	272.6%	930,071	1,871,801	2,534,911	201.3%	272.6%	7.50%	1.6293
	2007	628	617,806	1,195,069	463,582	193.4%	75.0%	936,377	1,811,305	702,628	193.4%	75.0%	7.50%	1.5156
	2008	598	584,110	1,530,315	1,759,989	262.0%	301.3%	823,540	2,157,600	2,481,419	262.0%	301.3%	7.50%	1.4099
	2009	560	551,466	1,498,676	1,775,332	271.8%	321.9%	723,270	1,965,574	2,328,420	271.8%	321.9%	7.50%	1.3115
	2010	520	570,640	1,513,334	724,224	265.2%	126.9%	696,202	1,846,325	883,581	265.2%	126.9%	7.50%	1.2200
	2011	479	528,609	1,642,156	1,901,608	310.7%	359.7%	599,929	1,863,714	2,158,170	310.7%	359.7%	7.50%	1.1349
	2012	445	511,741	1,824,094	1,071,745	356.4%	209.4%	540,264	1,925,766	1,131,483	356.4%	209.4%	7.50%	1.0557
	1/2013-3/2013	439	133,135	391,443	518,971	294.0%	389.8%	134,344	394,998	523,684	294.0%	389.8%	7.50%	1.0091
	4/2013-12/2013	411	389,231	1,229,086	1,246,005	315.8%	320.1%	378,817	1,196,200	1,212,667	315.8%	320.1%	7.50%	0.9732
	2014	375	473,987	1,375,114	1,648,382	290.1%	347.8%	433,018	1,256,256	1,505,904	290.1%	347.8%	7.50%	0.9136
	2015	339	424,414	1,523,188	1,613,414	358.9%	380.2%	360,679	1,294,448	1,371,125	358.9%	380.2%	7.50%	0.8498
	2016	304	377,302	1,641,417	1,566,639	435.0%	415.2%	298,271	1,297,602	1,238,487	435.0%	415.2%	7.50%	0.7905
	2017	271	332,948	1,703,168	1,516,497	511.5%	455.5%	244,845	1,252,482	1,115,207	511.5%	455.5%	7.50%	0.7354
	2018	240	291,726	1,709,407	1,451,107	586.0%	497.4%	199,564	1,169,368	992,670	586.0%	497.4%	7.50%	0.6841
Projected	2019	211	253,696	1,698,254	1,375,736	669.4%	542.3%	161,440	1,080,686	875,452	669.4%	542.3%	7.50%	0.6364
Future	2020	184	218,828	1,670,158	1,287,188	763.2%	588.2%	129,536	988,658	761,957	763.2%	588.2%	7.50%	0.5920
Experience	2021	159	187,209	1,613,038	1,186,167	861.6%	633.6%	103,088	888,229	653,169	861.6%	633.6%	7.50%	0.5507
	2022	136	158,793	1,536,378	1,079,077	967.5%	679.5%	81,340	786,991	552,744	967.5%	679.5%	7.50%	0.5122
	2023	115	133,553	1,445,153	967,142	1082.1%	724.2%	63,638	688,616	460,843	1082.1%	724.2%	7.50%	0.4765
	2024	97	111,346	1,336,143	855,767	1200.0%	768.6%	49,355	592,254	379,324	1200.0%	768.6%	7.50%	0.4433
	2025	80	92,003	1,216,822	750,223	1322.6%	815.4%	37,936	501,734	309,340	1322.6%	815.4%	7.50%	0.4123
	2026	66	75,325	1,097,238	651,647	1456.7%	865.1%	28,892	420,861	249,948	1456.7%	865.1%	7.50%	0.3836
	2027	54	61,057	983,380	560,085	1610.6%	917.3%	21,786	350,874	199,841	1610.6%	917.3%	7.50%	0.3568
	2028	43	48,997	872,528	476,034	1780.8%	971.6%	16,262	289,601	158,001	1780.8%	971.6%	7.50%	0.3319
	2029	35	38,927	766,345	399,789	1968.7%	1027.0%	12,019	236,612	123,436	1968.7%	1027.0%	7.50%	0.3088
	2030	27	30,605	666,082	330,314	2176.4%	1079.3%	8,790	191,307	94,870	2176.4%	1079.3%	7.50%	0.2872
	2031	21	23,800	572,546	268,623	2405.6%	1128.6%	6,359	152,970	71,769	2405.6%	1128.6%	7.50%	0.2672
	2032	16	18,297	486,482	214,435	2658.8%	1172.0%	4,547	120,908	53,294	2658.8%	1172.0%	7.50%	0.2485
	2033	12	13,897	408,295	167,927	2938.0%	1208.4%	3,213	94,396	38,824	2938.0%	1208.4%	7.50%	0.2312
	2034	9	10,422	338,281	129,101	3245.8%	1238.7%	2,241	72,752	27,765	3245.8%	1238.7%	7.50%	0.2151
	2035	7	7,713	276,578	97,377	3585.8%	1262.5%	1,543	55,332	19,481	3585.8%	1262.5%	7.50%	0.2001
	2036	5	5,629	223,082	72,318	3963.1%	1284.7%	1,048	41,516	13,459	3963.1%	1284.7%	7.50%	0.1861
	2037	4	4,048	177,505	52,899	4385.1%	1306.8%	701	30,729	9,158	4385.1%	1306.8%	7.50%	0.1731
	2038	2	2,866	139,326	38,081	4861.7%	1328.8%	462	22,437	6,133	4861.7%	1328.8%	7.50%	0.1610
	2039	2	1,995	107,872	26,949	5406.5%	1350.7%	299	16,160	4,037	5406.5%	1350.7%	7.50%	0.1498
	2040	1	1,364	82,367	18,721	6038.3%	1372.5%	190	11,478	2,609	6038.3%	1372.5%	7.50%	0.1394
	2041	1	914	62,005	12,742	6784.1%	1394.2%	118	8,038	1,652	6784.1%	1394.2%	7.50%	0.1296
	2042	0	599	46,002	8,476	7684.2%	1415.8%	72	5,547	1,022	7684.2%	1415.8%	7.50%	0.1206
	2043	0	382	33,625	5,493	8799.3%	1437.5%	43	3,772	616	8799.3%	1437.5%	7.50%	0.1122
	2044	0	237	24,205	3,455	10222.8%	1459.3%	25	2,526	361	10222.8%	1459.3%	7.50%	0.1043
	2045	0	142	17,152	2,100	12100.1%	1481.3%	14	1,665	204	12100.1%	1481.3%	7.50%	0.0971
	2046	0	82	11,958	1,226	14663.9%	1503.7%	7	1,080	111	14663.9%	1503.7%	7.50%	0.0903
	2047	0	45	8,197	684	18300.2%	1526.5%	4	689	57	18300.2%	1526.5%	7.50%	0.0840
	2048	0	23	5,519	361	23681.6%	1549.9%	2	431	28	23681.6%	1549.9%	7.50%	0.0781
	2049	0	11	3,647	179	32050.0%	1573.7%	1	265	13	32050.0%	1573.7%	7.50%	0.0727
	2050	0	5	2,362	82	45868.2%	1597.8%	0	160	6	45868.2%	1597.8%	7.50%	0.0676
	2051	0	2	1,497	34	70467.6%	1622.4%	0	94	2	70467.6%	1622.4%	7.50%	0.0629
	2052	0	1	928	13	118716.9%	1647.7%	0	54	1	118716.9%	1647.7%	7.50%	0.0585
	Past		15,655,704	17,261,700	18,337,039	110.3%	117.1%	42,273,911	29,094,867	33,914,028	68.8%	80.2%		
	Future		3,792,422	27,112,330	20,082,489	714.9%	529.5%	2,650,163	15,125,778	12,505,587	570.7%	471.9%		
	Lifetime		19,448,126	44,374,030	38,419,527	228.2%	197.5%	44,924,074	44,220,646	46,419,615	98.4%	103.3%		

EXHIBIT X
RiverSource Life Insurance Company
Virginia Experience Projections with 20% Increase
Policy Forms: 30240-VA and 30240-VA1

			Loss Ratio Demonstration										Interest Rate Factors	
			Without Interest					With Interest						
	Calendar Year	Ending Policies Inforce	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Calendar Year Effective Int Rate	Mid-Year Disc / Accum Factor
	1989	97	12,930	0	0	0.0%	0.0%	72,034	0	0	0.0%	0.0%	7.50%	5.5712
	1990	506	281,227	0	0	0.0%	0.0%	1,457,472	0	0	0.0%	0.0%	7.50%	5.1825
	1991	806	545,656	0	0	0.0%	0.0%	2,630,589	0	0	0.0%	0.0%	7.50%	4.8210
	1992	1,107	805,015	0	49,943	0.0%	6.2%	3,610,187	0	223,974	0.0%	6.2%	7.50%	4.4846
	1993	1,134	977,851	32,163	23,317	3.3%	2.4%	4,079,339	134,175	97,272	3.3%	2.4%	7.50%	4.1717
	1994	1,081	928,315	90,262	386,822	9.7%	41.7%	3,602,501	350,279	1,501,136	9.7%	41.7%	7.50%	3.8807
	1995	1,053	897,829	165,157	518,937	18.4%	57.8%	3,241,110	596,207	1,873,331	18.4%	57.8%	7.50%	3.6099
	1996	1,021	873,314	279,475	2,242	32.0%	0.3%	2,932,662	938,500	7,528	32.0%	0.3%	7.50%	3.3581
	1997	991	840,512	263,453	578,394	31.3%	68.8%	2,625,591	822,976	1,806,789	31.3%	68.8%	7.50%	3.1238
Historical	1998	930	801,303	331,945	276,031	41.4%	34.4%	2,328,476	964,586	802,109	41.4%	34.4%	7.50%	2.9059
Experience	1999	895	756,673	393,906	859,750	52.1%	113.6%	2,045,384	1,064,777	2,324,013	52.1%	113.6%	7.50%	2.7031
	2000	863	727,942	637,070	1,540,439	87.5%	211.6%	1,830,436	1,601,937	3,873,490	87.5%	211.6%	7.50%	2.5145
	2001	832	693,976	901,170	984,009	129.9%	141.8%	1,623,282	2,107,929	2,301,699	129.9%	141.8%	7.50%	2.3391
	2002	799	660,626	842,176	419,803	127.5%	63.5%	1,437,462	1,832,499	913,453	127.5%	63.5%	7.50%	2.1759
	2003	765	623,380	775,958	684,644	124.5%	109.8%	1,261,786	1,570,618	1,385,791	124.5%	109.8%	7.50%	2.0241
	2004	735	596,869	850,337	1,013,967	142.5%	169.9%	1,123,836	1,601,087	1,909,184	142.5%	169.9%	7.50%	1.8829
	2005	698	563,947	954,720	1,227,484	169.3%	217.7%	987,766	1,672,213	2,149,964	169.3%	217.7%	7.50%	1.7515
	2006	659	570,833	1,148,821	1,555,807	201.3%	272.6%	930,071	1,871,801	2,534,911	201.3%	272.6%	7.50%	1.6293
	2007	628	617,806	1,195,069	463,582	193.4%	75.0%	936,377	1,811,305	702,628	193.4%	75.0%	7.50%	1.5156
	2008	598	584,110	1,530,315	1,759,989	262.0%	301.3%	823,540	2,157,600	2,481,419	262.0%	301.3%	7.50%	1.4099
	2009	560	551,466	1,498,676	1,775,332	271.8%	321.9%	723,270	1,965,574	2,328,420	271.8%	321.9%	7.50%	1.3115
	2010	520	570,640	1,513,334	724,224	265.2%	126.9%	696,202	1,846,325	883,581	265.2%	126.9%	7.50%	1.2200
	2011	479	528,609	1,642,156	1,901,608	310.7%	359.7%	599,929	1,863,714	2,158,170	310.7%	359.7%	7.50%	1.1349
	2012	445	511,741	1,824,094	1,071,745	356.4%	209.4%	540,264	1,925,766	1,131,483	356.4%	209.4%	7.50%	1.0557
	1/2013-3/2013	439	133,135	391,443	518,971	294.0%	389.8%	134,344	394,998	523,684	294.0%	389.8%	7.50%	1.0091
	4/2013-12/2013	411	389,231	1,229,085	1,245,727	315.8%	320.0%	378,817	1,196,199	1,212,397	315.8%	320.0%	7.50%	0.9732
	2014	367	517,025	1,374,257	1,642,331	265.8%	317.7%	472,336	1,255,473	1,500,376	265.8%	317.7%	7.50%	0.9136
	2015	332	495,097	1,520,695	1,606,389	307.2%	324.5%	420,747	1,292,329	1,365,154	307.2%	324.5%	7.50%	0.8498
	2016	298	440,138	1,636,784	1,552,395	371.9%	352.7%	347,945	1,293,939	1,227,227	371.9%	352.7%	7.50%	0.7905
	2017	266	388,397	1,693,912	1,489,204	436.1%	383.4%	285,621	1,245,675	1,095,136	436.1%	383.4%	7.50%	0.7354
	2018	236	340,309	1,693,477	1,418,643	497.6%	416.9%	232,798	1,158,470	970,462	497.6%	416.9%	7.50%	0.6841
Projected	2019	207	295,946	1,676,672	1,344,625	566.5%	454.3%	188,326	1,066,953	855,654	566.5%	454.3%	7.50%	0.6364
Future	2020	180	255,270	1,644,686	1,257,783	644.3%	492.7%	151,108	973,580	744,551	644.3%	492.7%	7.50%	0.5920
Experience	2021	155	218,385	1,585,279	1,158,811	725.9%	530.6%	120,255	872,943	638,106	725.9%	530.6%	7.50%	0.5507
	2022	133	185,237	1,507,675	1,053,963	813.9%	569.0%	94,886	772,288	539,880	813.9%	569.0%	7.50%	0.5122
	2023	113	155,794	1,416,480	944,439	909.2%	606.2%	74,236	674,953	450,025	909.2%	606.2%	7.50%	0.4765
	2024	95	129,889	1,308,246	835,513	1007.2%	643.3%	57,574	579,888	370,346	1007.2%	643.3%	7.50%	0.4433
	2025	79	107,325	1,190,281	732,325	1109.0%	682.3%	44,253	490,790	301,961	1109.0%	682.3%	7.50%	0.4123
	2026	65	87,869	1,072,476	635,982	1220.5%	723.8%	33,703	411,363	243,940	1220.5%	723.8%	7.50%	0.3836
	2027	53	71,225	960,681	546,525	1348.8%	767.3%	25,414	342,774	195,002	1348.8%	767.3%	7.50%	0.3568
	2028	43	57,156	852,055	464,432	1490.8%	812.6%	18,971	282,806	154,150	1490.8%	812.6%	7.50%	0.3319
	2029	34	45,409	748,161	389,986	1647.6%	858.8%	14,020	230,998	120,410	1647.6%	858.8%	7.50%	0.3088
	2030	27	35,702	650,156	322,170	1821.1%	902.4%	10,254	186,733	92,531	1821.1%	902.4%	7.50%	0.2872
	2031	21	27,764	558,770	261,968	2012.6%	943.6%	7,418	149,289	69,991	2012.6%	943.6%	7.50%	0.2672
	2032	16	21,344	474,709	209,099	2224.1%	979.7%	5,305	117,982	51,968	2224.1%	979.7%	7.50%	0.2485
	2033	12	16,211	398,362	163,732	2457.3%	1010.0%	3,748	92,099	37,854	2457.3%	1010.0%	7.50%	0.2312
	2034	9	12,158	330,010	125,865	2714.4%	1035.3%	2,615	70,974	27,069	2714.4%	1035.3%	7.50%	0.2151
	2035	7	8,997	269,785	94,929	2998.4%	1055.1%	1,800	53,973	18,992	2998.4%	1055.1%	7.50%	0.2001
	2036	5	6,566	217,580	70,495	3313.6%	1073.6%	1,222	40,492	13,119	3313.6%	1073.6%	7.50%	0.1861
	2037	3	4,722	173,110	51,562	3666.1%	1092.0%	817	29,969	8,926	3666.1%	1092.0%	7.50%	0.1731
	2038	2	3,343	135,865	37,116	4064.1%	1110.2%	538	21,880	5,977	4064.1%	1110.2%	7.50%	0.1610
	2039	2	2,327	105,184	26,265	4519.2%	1128.5%	349	15,757	3,935	4519.2%	1128.5%	7.50%	0.1498
	2040	1	1,591	80,308	18,245	5047.0%	1146.6%	222	11,191	2,543	5047.0%	1146.6%	7.50%	0.1394
	2041	1	1,066	60,451	12,417	5670.0%	1164.7%	138	7,836	1,610	5670.0%	1164.7%	7.50%	0.1296
	2042	0	698	44,846	8,260	6421.8%	1182.7%	84	5,408	996	6421.8%	1182.7%	7.50%	0.1206
	2043	0	446	32,778	5,353	7353.4%	1200.8%	50	3,677	600	7353.4%	1200.8%	7.50%	0.1122
	2044	0	276	23,594	3,367	8542.5%	1218.9%	29	2,462	351	8542.5%	1218.9%	7.50%	0.1043
	2045	0	165	16,719	2,046	10110.8%	1237.3%	16	1,623	199	10110.8%	1237.3%	7.50%	0.0971
	2046	0	95	11,655	1,195	12252.5%	1255.9%	9	1,052	108	12252.5%	1255.9%	7.50%	0.0903
	2047	0	52	7,989	666	15290.3%	1275.0%	4	671	56	15290.3%	1275.0%	7.50%	0.0840
	2048	0	27	5,379	352	19785.8%	1294.5%	2	420	27	19785.8%	1294.5%	7.50%	0.0781
	2049	0	13	3,554	174	26776.7%	1314.3%	1	258	13	26776.7%	1314.3%	7.50%	0.0727
	2050	0	6	2,302	80	38320.2%	1334.4%	0	156	5	38320.2%	1334.4%	7.50%	0.0676
	2051	0	2	1,459	34	58869.9%	1354.9%	0	92	2	58869.9%	1354.9%	7.50%	0.0629
	2052	0	1	904	13	99175.9%	1376.0%	0	53	1	99175.9%	1376.0%	7.50%	0.0585
	Past		15,655,704	17,261,700	18,337,039	110.3%	117.1%	42,273,911	29,094,867	33,914,028	68.8%	80.2%		
	Future		4,323,278	26,716,370	19,734,475	618.0%	456.5%	2,995,631	14,955,470	12,321,651	499.2%	411.3%		
	Lifetime		19,978,982	43,978,070	38,071,513	220.1%	190.6%	45,269,542	44,050,338	46,235,679	97.3%	102.1%		

EXHIBIT XI
RiverSource Life Insurance Company
Incurred Loss Ratio Including the Change in Active Life Reserves
Nationwide Experience, without Interest
Policy Form: 30240

Calendar Year	(a) Earned Premiums [1]	(b) Incurred Claims	(c) Change in Active Life Reserves	(d) = (b+c)/(a) Loss Ratio
1989	477,819	0	1,391,207	291.2%
1990	11,323,037	1,155	3,284,193	29.0%
1991	23,730,033	3,294,975	3,237,764	27.5%
1992	34,448,430	6,171,474	19,429,171	74.3%
1993	40,970,649	8,891,377	32,326,913	100.6%
1994	39,420,810	9,855,045	37,913,000	121.2%
1995	37,637,454	11,266,955	36,886,685	127.9%
1996	36,134,012	15,624,614	35,463,628	141.4%
1997	34,589,007	17,780,628	34,003,890	149.7%
1998	33,122,919	19,443,305	32,223,628	156.0%
1999	31,290,387	22,760,137	30,066,684	168.8%
2000	29,843,654	26,669,331	27,595,790	181.8%
2001	28,399,995	26,494,505	24,806,314	180.6%
2002	26,899,593	30,544,425	21,687,898	194.2%
2003	25,356,832	33,084,721	18,308,593	202.7%
2004	23,927,805	38,627,557	14,827,967	223.4%
2005	21,567,058	41,667,455	(9,867,495)	147.4%
2006	21,676,207	40,389,114	4,066,404	205.1%
2007	23,466,443	46,146,562	2,038,046	205.3%
2008	21,827,751	52,689,538	(784,233)	237.8%
2009	20,383,511	54,558,958	(6,179,502)	237.3%
2010	20,581,446	53,964,474	(7,157,861)	227.4%
2011	18,860,305	56,695,958	2,640,564	314.6%
2012	18,216,181	55,888,139	(13,739,295)	231.4%
1/2013-3/2013	4,673,528	17,202,549	(4,446,262)	272.9%
Total	628,824,867	689,712,948	340,023,692	163.8%

[1] Premiums reflect the accumulated 78.5% rate increases as approved in Virginia and implemented from 2006 through 2013 on a nationwide basis.

EXHIBIT XII
RiverSource Life Insurance Company
Incurred Loss Ratio Including the Change in Active Life Reserves
Virginia Experience, without Interest
Policy Forms: 30240-VA and 30240-VA1

Calendar Year	(a) Earned Premiums	(b) Incurred Claims	(c) Change in Active Life Reserves	(d) = (b+c)/(a) Loss Ratio
1989	12,930	0	28,983	224.2%
1990	281,227	0	54,859	19.5%
1991	545,656	0	52,250	9.6%
1992	805,015	49,943	469,461	64.5%
1993	977,851	23,317	820,570	86.3%
1994	928,315	386,822	974,675	146.7%
1995	897,829	518,937	944,138	163.0%
1996	873,314	2,242	913,449	104.9%
1997	840,512	578,394	883,963	174.0%
1998	801,303	276,031	846,271	140.1%
1999	756,673	859,750	800,396	219.4%
2000	727,942	1,540,439	743,463	313.7%
2001	693,976	984,009	677,493	239.4%
2002	660,626	419,803	602,700	154.8%
2003	623,380	684,644	520,755	193.4%
2004	596,869	1,013,967	434,680	242.7%
2005	563,947	1,227,484	253,411	262.6%
2006	570,833	1,555,807	6,654	273.7%
2007	617,806	463,582	65,253	85.6%
2008	584,110	1,759,989	206,335	336.6%
2009	551,466	1,775,332	(24,383)	317.5%
2010	570,640	724,224	(137,587)	102.8%
2011	528,609	1,901,608	530,319	460.1%
2012	511,741	1,071,745	(286,645)	153.4%
1/2013-3/2013	133,135	518,971	(97,624)	316.5%
Total	15,655,704	18,337,039	10,283,838	182.8%

EXHIBIT XIII

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

LIFETIME BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	72.10	54.44	151.34	114.40	230.76	174.54
51	72.10	54.44	151.34	114.40	230.76	174.54
52	72.10	54.44	151.34	114.40	230.76	174.54
53	72.10	54.44	151.34	114.40	230.76	174.54
54	72.10	54.44	151.34	114.40	230.76	174.54
55	72.10	54.44	151.34	114.40	230.76	174.54
56	78.54	60.84	164.74	127.78	249.50	193.64
57	84.78	65.68	178.12	137.96	272.16	210.76
58	94.42	72.10	198.28	151.34	293.74	224.14
59	104.06	78.54	214.16	161.52	315.00	237.54
60	113.68	89.76	229.14	180.78	338.36	266.96
61	126.54	102.44	241.66	195.94	355.88	279.64
62	137.60	108.88	252.88	200.26	364.24	291.96
63	156.88	126.54	275.00	221.84	385.48	310.88
64	174.54	137.76	295.00	232.90	416.00	328.38
65	192.02	157.04	310.72	253.78	442.06	361.04
66	209.70	168.10	328.00	263.24	454.54	364.80
67	233.80	185.80	355.88	282.88	493.28	392.08
68	257.70	209.88	386.90	315.16	541.64	441.16
69	288.24	229.14	420.64	334.26	586.96	466.52
70	318.58	253.06	451.50	358.72	657.46	522.36
71	348.92	277.18	483.64	384.06	669.42	531.46
72	384.24	305.90	516.30	411.18	698.70	556.46
73	425.82	342.84	558.96	449.92	739.92	595.72
74	469.00	377.98	600.90	484.36	788.80	635.88
75	521.84	414.94	652.12	518.44	860.38	684.04
76	576.26	456.52	701.90	556.10	907.66	719.22
77	630.70	504.52	761.70	609.30	986.72	789.36
78	685.14	546.28	805.76	642.48	999.98	841.82
79	737.96	594.28	852.34	686.36	999.98	918.92

EXHIBIT XIII

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

4 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	55.50	39.98	116.36	84.06	161.34	116.54
51	55.50	39.98	116.36	84.06	161.34	116.54
52	55.50	39.98	116.36	84.06	161.34	116.54
53	55.50	39.98	116.36	84.06	161.34	116.54
54	55.50	39.98	116.36	84.06	161.34	116.54
55	55.50	39.98	116.36	84.06	161.34	116.54
56	60.32	44.80	126.70	94.06	174.54	129.56
57	65.32	48.36	137.06	101.36	190.42	140.80
58	72.64	53.00	152.58	111.38	205.42	149.92
59	80.12	57.64	164.74	118.86	220.22	158.84
60	87.46	66.02	176.32	132.96	236.82	178.48
61	97.28	75.30	185.96	144.02	248.98	187.58
62	105.84	80.12	194.52	147.24	254.84	198.28
63	120.64	93.00	211.66	163.12	269.66	207.92
64	134.20	101.36	226.84	171.34	290.72	219.70
65	147.78	115.46	238.96	186.66	305.54	234.32
66	161.34	123.70	252.36	193.46	319.80	247.34
67	179.70	136.70	273.78	208.10	344.98	262.36
68	198.28	154.36	297.68	231.64	378.90	294.84
69	221.66	168.46	323.56	245.74	410.46	311.76
70	245.02	186.16	347.28	263.76	459.72	349.26
71	268.42	203.82	372.12	282.52	468.30	355.52
72	295.52	225.06	397.26	302.32	488.80	371.92
73	327.48	252.00	429.92	330.88	517.36	398.16
74	360.86	278.04	462.22	356.04	551.64	424.92
75	401.36	304.98	501.68	381.20	601.78	457.24
76	443.30	335.68	540.02	408.88	634.96	480.62
77	485.24	371.02	585.90	447.94	690.12	527.54
78	527.02	401.72	619.80	472.40	738.30	562.72
79	567.70	437.04	655.68	504.70	798.10	614.28

EXHIBIT XIII

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

3 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	49.78	37.66	104.56	79.06	144.92	109.60
51	49.78	37.66	104.56	79.06	144.92	109.60
52	49.78	37.66	104.56	79.06	144.92	109.60
53	49.78	37.66	104.56	79.06	144.92	109.60
54	49.78	37.66	104.56	79.06	144.92	109.60
55	49.78	37.66	104.56	79.06	144.92	109.60
56	53.72	41.58	112.80	87.26	155.26	120.10
57	58.90	45.52	123.70	95.66	171.70	132.78
58	65.86	50.34	138.32	105.64	186.32	142.24
59	72.10	54.26	148.30	111.72	198.28	149.36
60	78.54	61.74	158.30	124.56	212.54	167.22
61	86.74	70.32	165.80	134.40	222.02	179.90
62	95.30	75.50	175.08	138.66	229.34	185.24
63	109.24	88.16	191.50	154.54	243.96	196.86
64	120.64	95.14	203.98	160.80	261.46	206.14
65	132.60	108.32	214.32	175.26	271.80	217.72
66	143.84	115.28	225.06	180.42	283.58	227.36
67	162.04	128.68	246.64	195.94	310.88	247.00
68	179.54	146.16	269.66	219.52	343.20	279.32
69	199.34	158.48	290.90	231.28	369.06	293.42
70	219.86	174.54	311.60	247.34	412.60	327.48
71	239.14	189.88	331.40	263.24	417.08	331.24
72	266.46	212.02	358.18	285.02	440.64	350.70
73	296.98	238.80	389.78	313.38	469.00	377.10
74	324.62	261.26	415.82	334.62	496.30	399.40
75	360.14	286.26	449.92	357.66	539.68	429.04
76	395.14	312.86	481.32	381.04	565.92	447.94
77	437.42	349.62	528.26	422.08	622.12	497.04
78	477.24	380.32	561.28	447.22	668.54	532.74
79	510.60	410.82	589.66	474.54	717.62	577.52

EXHIBIT XIII

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

2 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	41.94	31.40	87.98	66.02	122.08	91.54
51	41.94	31.40	87.98	66.02	122.08	91.54
52	41.94	31.40	87.98	66.02	122.08	91.54
53	41.94	31.40	87.98	66.02	122.08	91.54
54	41.94	31.40	87.98	66.02	122.08	91.54
55	41.94	31.40	87.98	66.02	122.08	91.54
56	46.78	33.74	98.34	70.86	135.46	97.62
57	50.50	38.20	106.00	80.32	147.24	111.54
58	55.50	42.66	116.36	89.76	156.68	120.80
59	60.32	46.06	124.20	94.94	166.16	126.90
60	68.88	50.70	139.02	102.08	183.10	137.06
61	73.88	55.14	141.16	105.28	189.00	141.00
62	83.70	63.02	153.84	115.64	201.48	147.94
63	92.44	67.46	161.88	118.32	206.30	150.80
64	105.84	76.40	179.00	129.22	229.50	165.60
65	115.82	84.42	187.22	136.34	242.16	176.32
66	129.40	93.36	202.20	145.98	254.68	184.02
67	142.78	101.20	217.56	154.00	274.12	194.16
68	157.60	113.50	236.64	170.44	301.06	216.86
69	171.14	122.60	249.86	178.82	316.94	226.84
70	184.70	134.90	261.80	191.32	346.58	253.24
71	203.26	147.24	281.62	204.18	354.42	256.98
72	221.66	160.80	297.86	216.14	366.38	265.92
73	240.22	177.04	315.16	232.38	379.24	279.64
74	263.58	194.00	337.66	248.42	402.98	296.44
75	290.54	211.32	363.18	264.14	435.64	316.78
76	318.92	231.64	388.52	282.16	456.68	331.76
77	346.04	253.06	417.78	305.54	492.02	359.76
78	374.42	274.30	440.28	322.66	524.34	384.44
79	406.34	295.72	469.36	341.58	571.26	415.82
80		320.52				
81		346.22				
82		375.50				
83		404.76				
84		442.94				

EXHIBIT XIV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

LIFETIME BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	86.54	65.36	181.68	137.32	277.04	209.54
51	86.54	65.36	181.68	137.32	277.04	209.54
52	86.54	65.36	181.68	137.32	277.04	209.54
53	86.54	65.36	181.68	137.32	277.04	209.54
54	86.54	65.36	181.68	137.32	277.04	209.54
55	86.54	65.36	181.68	137.32	277.04	209.54
56	94.28	73.06	197.76	153.40	299.52	232.46
57	101.76	78.86	213.82	165.62	326.74	253.04
58	113.36	86.54	238.04	181.68	352.66	269.12
59	124.92	94.28	257.08	193.90	378.14	285.16
60	136.48	107.78	275.08	217.06	406.22	320.52
61	151.92	122.98	290.08	235.22	427.20	335.74
62	165.20	130.68	303.60	240.40	437.30	350.50
63	188.36	151.92	330.14	266.30	462.76	373.20
64	209.54	165.40	354.16	279.60	499.42	394.20
65	230.52	188.54	373.00	304.66	530.68	433.44
66	251.74	201.82	393.76	316.04	545.68	437.92
67	280.66	223.04	427.20	339.60	592.18	470.72
68	309.36	251.96	464.48	378.36	650.24	529.60
69	346.04	275.08	505.00	401.28	704.66	560.04
70	382.42	303.80	542.04	430.64	789.28	627.10
71	418.84	332.72	580.58	461.06	803.64	638.04
72	461.28	367.22	619.82	493.64	838.78	668.00
73	511.18	411.58	671.02	540.14	888.24	715.16
74	563.04	453.76	721.40	581.44	946.96	763.36
75	626.48	498.12	782.86	622.40	999.98	821.20
76	691.80	548.02	842.64	667.58	999.98	863.40
77	757.16	605.68	914.40	731.42	999.98	947.62
78	822.50	655.80	967.32	771.28	999.98	999.98
79	885.92	713.42	999.98	824.00	999.98	999.98

EXHIBIT XIV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

4 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	66.62	48.00	139.68	100.90	193.68	139.90
51	66.62	48.00	139.68	100.90	193.68	139.90
52	66.62	48.00	139.68	100.90	193.68	139.90
53	66.62	48.00	139.68	100.90	193.68	139.90
54	66.62	48.00	139.68	100.90	193.68	139.90
55	66.62	48.00	139.68	100.90	193.68	139.90
56	72.44	53.78	152.12	112.92	209.54	155.54
57	78.40	58.08	164.54	121.68	228.60	169.06
58	87.22	63.64	183.20	133.70	246.60	179.98
59	96.22	69.22	197.76	142.70	264.38	190.68
60	105.00	79.28	211.66	159.60	284.30	214.24
61	116.78	90.40	223.24	172.92	298.88	225.20
62	127.04	96.22	233.52	176.76	305.96	238.04
63	144.82	111.64	254.08	195.82	323.72	249.62
64	161.12	121.68	272.30	205.68	349.00	263.74
65	177.38	138.62	286.88	224.12	366.76	281.30
66	193.68	148.48	302.92	232.24	383.92	296.96
67	215.76	164.12	328.66	249.82	414.14	314.96
68	238.04	185.32	357.36	278.08	454.84	353.96
69	266.08	202.24	388.44	295.00	492.76	374.28
70	294.16	223.48	416.92	316.66	551.88	419.30
71	322.22	244.68	446.72	339.14	562.18	426.76
72	354.80	270.16	476.90	362.96	586.82	446.50
73	393.14	302.52	516.12	397.22	621.12	477.98
74	433.20	333.80	554.90	427.42	662.24	510.12
75	481.84	366.14	602.26	457.64	722.42	548.90
76	532.18	403.00	648.28	490.84	762.28	576.98
77	582.56	445.44	703.40	537.76	828.50	633.32
78	632.66	482.28	744.08	567.12	886.34	675.50
79	681.52	524.72	787.12	605.88	958.10	737.44

EXHIBIT XIV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

3 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	59.78	45.22	125.54	94.92	173.96	131.54
51	59.78	45.22	125.54	94.92	173.96	131.54
52	59.78	45.22	125.54	94.92	173.96	131.54
53	59.78	45.22	125.54	94.92	173.96	131.54
54	59.78	45.22	125.54	94.92	173.96	131.54
55	59.78	45.22	125.54	94.92	173.96	131.54
56	64.52	49.92	135.40	104.76	186.38	144.20
57	70.70	54.64	148.48	114.84	206.12	159.38
58	79.08	60.40	166.04	126.82	223.68	170.76
59	86.54	65.14	178.06	134.12	238.04	179.36
60	94.28	74.14	190.06	149.54	255.16	200.76
61	104.14	84.40	199.06	161.32	266.54	215.98
62	114.40	90.64	210.16	166.48	275.30	222.38
63	131.14	105.84	229.88	185.52	292.90	236.30
64	144.82	114.22	244.90	193.04	313.88	247.46
65	159.20	130.06	257.30	210.38	326.30	261.38
66	172.70	138.40	270.16	216.60	340.44	272.92
67	194.52	154.48	296.08	235.22	373.20	296.50
68	215.52	175.48	323.72	263.52	412.00	335.30
69	239.32	190.24	349.22	277.66	443.06	352.22
70	263.92	209.54	374.06	296.96	495.34	393.14
71	287.08	227.96	397.84	316.04	500.68	397.64
72	319.90	254.52	430.00	342.16	528.98	421.00
73	356.52	286.66	467.90	376.22	563.04	452.68
74	389.72	313.66	499.20	401.72	595.82	479.48
75	432.36	343.66	540.14	429.34	647.88	515.04
76	474.34	375.58	577.82	457.42	679.36	537.76
77	525.12	419.72	634.18	506.72	746.86	596.68
78	572.90	456.56	673.80	536.90	802.56	639.52
79	612.96	493.18	707.86	569.68	861.48	693.28

EXHIBIT XIV

RiverSource Life Insurance Company
Annual Premiums with 20% Increase

Nursing Home Indemnity Policy
FORMS: 30240-VA and 30240-VA1

Annual Premiums Per $10 Daily Benefit

2 YEAR BENEFIT PERIOD

	No Benefit Increase Option		**Simple Benefit Increase Option**		**Compound Benefit Increase Option**	
Issue	*Deductible*		*Deductible*		*Deductible*	
Age	*20 days*	*100 days*	*20 days*	*100 days*	*20 days*	*100 days*
50	50.36	37.70	105.62	79.28	146.56	109.90
51	50.36	37.70	105.62	79.28	146.56	109.90
52	50.36	37.70	105.62	79.28	146.56	109.90
53	50.36	37.70	105.62	79.28	146.56	109.90
54	50.36	37.70	105.62	79.28	146.56	109.90
55	50.36	37.70	105.62	79.28	146.56	109.90
56	56.14	40.48	118.06	85.06	162.62	117.20
57	60.64	45.84	127.28	96.40	176.76	133.92
58	66.62	51.22	139.68	107.78	188.08	145.06
59	72.44	55.28	149.12	114.00	199.46	152.32
60	82.68	60.86	166.90	122.54	219.82	164.54
61	88.70	66.22	169.46	126.40	226.90	169.24
62	100.48	75.62	184.68	138.84	241.90	177.60
63	110.98	80.98	194.32	142.06	247.66	181.06
64	127.04	91.68	214.90	155.12	275.52	198.84
65	139.06	101.36	224.74	163.70	290.74	211.66
66	155.32	112.06	242.74	175.28	305.74	220.88
67	171.40	121.48	261.16	184.90	329.06	233.12
68	189.20	136.28	284.08	204.60	361.44	260.32
69	205.48	147.20	299.96	214.68	380.50	272.30
70	221.74	161.96	314.30	229.66	416.06	304.00
71	244.04	176.76	338.06	245.08	425.48	308.52
72	266.08	193.04	357.58	259.46	439.88	319.22
73	288.36	212.52	378.36	278.96	455.28	335.74
74	316.46	232.90	405.36	298.22	483.76	355.88
75	348.80	253.68	436.00	317.08	522.98	380.30
76	382.88	278.08	466.42	338.74	548.28	398.30
77	415.44	303.80	501.56	366.76	590.68	431.90
78	449.50	329.30	528.56	387.36	629.44	461.48
79	487.84	355.00	563.44	410.06	685.80	499.20
80		384.76				
81		415.64				
82		450.76				
83		485.90				
84		531.76				