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:	01/10/2014
SERFF Tr Num:	AERS-129329714
SERFF Status:	Closed-Approved
State Tr Num:	AERS-129329714
State Status:	Approved
Co Tr Num:	30225 2014
Implementation Date Requested:	On Approval
Author(s):	Jeff Pederson, Cheryl Meyer, Kathleen Felton, Peg VanDrisse
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: *30225 2014/30225 2014*

General Information

Project Name: 30225 2014
Project Number: 30225 2014
Requested Filing Mode: Review & Approval
Explanation for Combination/Other:
Submission Type: New Submission
Overall Rate Impact: 15%

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:
This is an individual Long Term Care rate increase. 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: *30225 2014/30225 2014*

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	01/15/2014	01/15/2014

Response Letters

Responded By	Created On	Date Submitted
Cheryl Meyer	05/30/2014	05/30/2014
Cheryl Meyer	02/19/2014	02/19/2014

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
status	Note To Reviewer	Cheryl Meyer	11/24/2014	11/24/2014
status	Note To Filer	Janet Houser	09/10/2014	09/10/2014
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	02/25/2014	

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: *30225 2014/30225 2014*

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	472.300%	15.000%	$394,741	1,944	$2,631,609	15.000%	15.000%

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 and Third Party Document	Received & Acknowledged	Yes
Supporting Document	Rate Revision Checklist	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 ExhXVIPremiums 30225	Approved	Yes
Rate	VA ExhXV Premiums 30225	Withdrawn	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:	*30225 2014/30225 2014*		

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 your 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

MODEL BULLETIN

DATE: [Insert Date]

TO: All Licensed Insurers Writing Long-Term Care Insurance

FROM: [Insert Name & Title]

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

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

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

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

Actuarial Assumptions for Establishing Rate Increase Requests:

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

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

The assumptions will be consistent with the following:

1. All present and accumulated values used to determine rate increases shall use the maximum valuation interest rate for contract reserves. The actuary shall disclose as part of the actuarial memorandum the use of any averages.

2. All accumulated values used to determine rate increases shall use the actual experience of the product in as close a manner to that used in the original development of rates as possible. This is not intended to preclude the inclusion of multiple policy forms into one rate increase determination if such pooling increases the credibility of the combined accumulated experience.

3. All present values calculated to determine rate increases shall use reasonable estimates of future premium payments and claims payments. Such estimates are to be part of the assumptions as anticipated above and, for post-rate-stability policies this would include a margin for moderately adverse experience, while for pre-rate-stability policies, this would be based on best estimate assumptions for the future lifetime of the policies, including potential margins.

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

Approval of Rate Increases:

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

1. The [Department] may approve a single increase of the requested amount and the insurer agrees to not implement future rate increases on each subject policy for three years from the date of implementation of the rate increase for each policy form; or

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

Requirement to Administer Contingent Benefit Upon Lapse:

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

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

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

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

Policyholder Notification of Premium Increase:

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

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

Application of New Loss Ratio Standards:

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

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

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

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

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

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

Consideration of New Approaches:

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

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

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:	*30225 2014/30225 2014*		

Objection Letter

Objection Letter Status	Disapproved
Objection Letter Date	01/15/2014
Submitted Date	01/15/2014
Respond By Date	

Dear Cheryl Meyer,

Introduction:

A preliminary review of the submitted filing indicates the following concerns and questions. We'll continue our review of the submitted filing upon receipt of the following information:

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

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 originally anticipated.

Please provide an explanation as to why an additional rate increase is needed and a comparison of the difference 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 so that any projections can be recreated. An Excel file that shows 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 the rate increases on this block of business.

Please explain, if any, margins are included in the proposed rates to ensure that future rate increase 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 premiums.

Please provide a copy of the letter notifying Virginia policyholders there will be a rate increase. Any form used to amend existing coverage will need to be filed for review and approval. If the 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 the date of its approval.

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.

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:	30225 2014/30225 2014		

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.

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.

Please provide documentation supporting the company's assertion that a 472.3% rate increase is justified.

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

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: *30225 2014/30225 2014*

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 attached response.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	L&H Actuarial Memorandum
Comments:	
Attachment(s):	VA Revised_ActMem_30225_20140530.pdf
Previous Version	
Satisfied - Item:	*L&H Actuarial Memorandum*
Comments:	
Attachment(s):	*VA Revised_ActMem_30225_20140219.pdf*
Previous Version	
Satisfied - Item:	*L&H Actuarial Memorandum*
Comments:	
Attachment(s):	*VA ActMem_30225_20140110.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: *30225 2014/30225 2014*

Supporting Document Schedule Item Changes	
Satisfied - Item:	L&H Actuarial Memorandum
Comments:	
Attachment(s):	VA Revised_ActMem_30225_20140530.pdf
Previous Version	
Satisfied - Item:	*L&H Actuarial Memorandum*
Comments:	
Attachment(s):	*VA Revised_ActMem_30225_20140219.pdf*
Previous Version	
Satisfied - Item:	*L&H Actuarial Memorandum*
Comments:	
Attachment(s):	*VA ActMem_30225_20140110.pdf*

Satisfied - Item:	Response 5-30-14
Comments:	
Attachment(s):	VA Response_30225_20140530.pdf VA Rate Request Summary_30225_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: *30225 2014/30225 2014*

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 ExhXVIPremiums 30225	30225-VA	Revised	Previous State Filing Number: AERS-126909861 Percent Rate Change Request: 15	VA ExhXVI_Premiums_30225_20140530.pdf,	05/30/2014 By: Cheryl Meyer
Previous Version						
1	*VA ExhXV Premiums 30225*	*30225-VA*	*Revised*	*Previous State Filing Number: AERS-126909861 Percent Rate Change Request: 15*	*VA ExhXV_Premiums_30225_20140110.pdf,*	*01/10/2014 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: *30225 2014/30225 2014*

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 1/15/14.

Response 1

Comments:

Please see the attached response.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Response 2-19-14
Comments:	
Attachment(s):	VA Rate Request Summary_30225_20140219.pdf VA Response_30225_20140219.pdf VA Response_Attachments_30225_20140219.xlsx LTC Rate Increase Policyholder Q&A.pdf Sample LTC Policyholder Notification Letter - On Waiver.pdf Sample LTC Policyholder Notification Letter - Not On Waiver.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: *30225 2014/30225 2014*

Supporting Document Schedule Item Changes	
Satisfied - Item:	Response 2-19-14
Comments:	
Attachment(s):	VA Rate Request Summary_30225_20140219.pdf VA Response_30225_20140219.pdf VA Response_Attachments_30225_20140219.xlsx LTC Rate Increase Policyholder Q&A.pdf Sample LTC Policyholder Notification Letter - On Waiver.pdf Sample LTC Policyholder Notification Letter - Not On Waiver.pdf

Satisfied - Item:	L&H Actuarial Memorandum
Comments:	
Attachment(s):	VA Revised_ActMem_30225_20140219.pdf
Previous Version	
Satisfied - Item:	*L&H Actuarial Memorandum*
Comments:	
Attachment(s):	*VA ActMem_30225_20140110.pdf*

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:	*30225 2014/30225 2014*		

Note To Reviewer

Created By:

Cheryl Meyer on 11/24/2014 03:15 PM

Last Edited By:

Cheryl Meyer

Submitted On:

11/24/2014 03:15 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:	*30225 2014/30225 2014*		

Note To Filer

Created By:

Janet Houser on 09/10/2014 08:23 AM

Last Edited By:

Janet Houser

Submitted On:

09/10/2014 08:23 AM

Subject:

status

Comments:

This is to confirm my phone message of today regarding the three outstanding LTC filings. At this time, the filings remain under review pending direction from Virginia's State Corporation Commission. The SCC requested the Bureau of Insurance (BOI) provide information on LTC rate increases. After researching the matter, conducting a public hearing and gathering public comment, the BOI presented its report to the SCC.

Again, we appreciate your patience in this matter.

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:	*30225 2014/30225 2014*		

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:	*30225 2014/30225 2014*		

Note To Reviewer

Created By:

Cheryl Meyer on 07/09/2014 11:56 AM

Last Edited By:

Cheryl Meyer

Submitted On:

07/09/2014 11:56 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:	*30225 2014/30225 2014*		

Reviewer Note

Created By:

Janet Houser on 12/03/2014 12:26 PM

Last Edited By:

Janet Houser

Submitted On:

12/03/2014 01:01 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-129329714

Effective Date: Upon approval

Revised Rates

Average Annual Premium Per Member: $1556

Average Requested Percentage Rate Change Per Member: 15%

Minimum Requested Percentage Rate Change Per Member: 15%

Maximum Requested Percentage Rate Change Per Member: 15%

Number of Policy Holders Affected : 1944

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

Form#	"Product Name"(if applicable)
30225-VA	

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-129329714

Disposition: approved

Approval Date: 12/3/2014

Revised Rates

Average Annual Premium Per Member: $1556

Average Requested Percentage Rate Change Per Member: 15%

Minimum Requested Percentage Rate Change Per Member: 15%

Maximum Requested Percentage Rate Change Per Member: 15%

Number of Policy Holders Affected: 1944

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

The Company submitted a rate increase request of 15%. Since all of the policies were issued prior to the effective date of the rate stabilization requirements (10/1/2003), we have reviewed this filing pursuant to the requirements of 14VAC5-200-150 and 14VAC5-130-70. This increase would apply to the 1,944 policies in force in Virginia as of the date the filing was received on 01/10/2014. 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 117.2% and the anticipated future loss ratio taking into account the policy reserves is 83.1%. These ratios both exceed the required minimum, which is the greater of the original pricing loss ratio of 76.4% and the statutory minimum of 60%. We have reviewed the data for consistency and reasonableness and where data was found inconsistent or unreasonable, clarification was requested. We have utilized generally accepted actuarial methodologies in arriving at our opinion and confirm this increase is in compliance with applicable Virginia laws and regulations.

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

The company indicated that if the Bureau approved the currently requested 15% rate increase, the company agreed not to seek any increase effective within three years of the approval date. The company did indicate it is likely the company will request additional rate increases after three years. The company has included in its policyholder notice options that will allow the policyholder to reduce or eliminate the rate increase.

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

State:	*Virginia*	**Filing Company:**	*RiverSource Life Insurance Company*
TOI/Sub-TOI:	*LTC04I Individual Long Term Care - Nursing Home/LTC04I.001 Qualified*		
Product Name:	*Long Term Care*		
Project Name/Number:	*30225 2014/30225 2014*		

Reviewer Note

Created By:

Janet Houser on 06/30/2014 01:57 PM

Last Edited By:

Janet Houser

Submitted On:

12/03/2014 01:01 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:	*30225 2014/30225 2014*		

Reviewer Note

Created By:

Janet Houser on 03/05/2014 02:30 PM

Last Edited By:

Janet Houser

Submitted On:

01/28/2015 06:17 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-129329714**

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: $1,556

Average Requested Percentage Rate Change Per Member: 15%

Minimum Requested Percentage Rate Change Per Member: 15%

Maximum Requested Percentage Rate Change Per Member: 15%

+

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

The Company submitted a rate increase request of 15%. Since all of the policies were issued prior to the effective date of the rate stabilization requirements (10/1/2003), we have reviewed this filing pursuant to the requirements of 14VAC5-200-150 and 14VAC5-130-70. This increase would apply to the 1,944 policies in force in Virginia as of 9/30/2013. 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-129329714**

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: $1,556

Average Requested Percentage Rate Change Per Member: 15%

Minimum Requested Percentage Rate Change Per Member: 15%

Maximum Requested Percentage Rate Change Per Member: 15%

+

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

The Company submitted a rate increase request of 15%. Since all of the policies were issued prior to the effective date of the rate stabilization requirements (10/1/2003), we have reviewed this filing pursuant to the requirements of 14VAC5-200-150 and 14VAC5-130-70. This increase would apply to the 1,944 policies in force in Virginia as of 9/30/2013. 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 117.2% and the anticipated future loss ratio taking into account the policy reserves is 83.1%. These ratios both exceed the required minimum, which is the greater of the original pricing loss ratio of 76.4% and the statutory minimum of 60%. We have reviewed the data for consistency and reasonableness and where data was found inconsistent or unreasonable, clarification was requested. We have utilized generally accepted actuarial methodologies in arriving at our opinion and confirm this increase is in compliance with applicable Virginia laws and regulations.

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

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:	*30225 2014/30225 2014*		

Reviewer Note

Created By:

Janet Houser on 02/25/2014 09:37 AM

Last Edited By:

Janet Houser

Submitted On:

12/03/2014 01:01 PM

Subject:

Act Review

Comments:

Sent to ARC 2.25.14; due date 3.11.14

3.3.14 - recommend approval

10.28.14 - revised approval recommendation with NAIC compliance

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

March 3, 2014

Janet Houser
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-129329714

Dear Janet:

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 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 15% rate increase request based on its projection of future and lifetime loss ratios. The Company previously has raised rates by 35% in 2006, 15% in 2008, 15% in 2009 and by 15 in 2012. Implementation of the requested 15% increase would bring the cumulative rate increase percentage to 136.1%. Based on the information provided in Attachment 6, the average cumulative nationwide rate increase as of 2/18/2014 is 109%, though additional rate increases are planned in other states.

Analysis

The form was issued in Virginia from 1/1993 through 1/2001 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. We have reviewed and performed calculation checks on the exhibits provided by the Company and found those calculations to be performed in accordance with generally accepted actuarial methods.

Below is a summary of all applicable projected loss ratios:

A. Reported Lifetime LR based on original pricing	76.4%
B. Lifetime LR in the previous rate increase filing with current rates	237.8%
C. Lifetime LR currently projected w/o rate increase	235.6%
D. Lifetime LR currently projected w/ 15% rate increase	222.6%
E. Lifetime LR with requested premiums applicable from inception	64.5%
F. Anticipated Future LR w/ Active Life Reserves	83.1%

A comparison of C (235.6%) to B (237.8%) above shows that the expected lifetime loss ratio has improved slightly since the last rate increase. However, as noted in both this and the previous rate increase request, the Company has not requested the full amount of rate increase that could theoretically be justified in order to minimize the impact on policyholders to the extent possible. Instead, they have shown a pattern of requesting regular rate increases every year or two, presumably to minimize shock lapses and avoid large spikes in premiums.

Additional measures that the Bureau has traditionally used to determine whether a company is attempting to recoup past losses include the lifetime loss ratio assuming the requested premiums were charged from inception, which results in a 64.5% loss ratio (E) that exceeds the minimum. The anticipated future loss ratio considering the active life reserves (F) 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 decrease producing slightly lower loss ratio projections.

In total, the impact of all of these changes on the future expectations was slightly favorable as evidenced by the decrease in the expected loss ratio from 237.8% to 235.6%.

Other

Table 1 in the Company's February 19, 2014 response shows that, compared to the original pricing assumptions, the largest driver of the worsening loss ratio by far is the change in lapse assumptions.

The Company has indicated in their February 19, 2014 letter that "while the company currently has no formal plan to seek additional increases on this policy form, we believe that three (or possibly more) additional 15% rate increases would likely be requested if experience emerges with our current best estimate assumptions." The Bureau may wish to address with the Company appropriate disclosures to policyholders reflecting these likely future increases.

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

October 28, 2014

Janet Houser
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-129329714

Dear Janet:

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. 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 15% rate increase request based on its projection of future and lifetime loss ratios. The Company previously has raised rates by 35% in 2006, 15% in 2008, 15% in 2009 and by 15 in 2012. Implementation of the requested 15% increase would bring the cumulative rate increase percentage to 136.1%. Based on the information provided in Attachment 6, the average cumulative nationwide rate increase as of 2/18/2014 is 109%, though additional rate increases are planned in other states.

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 15% 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 XIV, 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: *30225 2014/30225 2014*

Rate Information

Rate data applies to filing.

Filing Method: Review and Approve
Rate Change Type: Increase
Overall Percentage of Last Rate Revision: 15.000%
Effective Date of Last Rate Revision: 10/01/2012
Filing Method of Last Filing: Review and Approve

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
RiverSource Life Insurance Company	472.300%	15.000%	$394,741	1,944	$2,631,609	15.000%	15.000%

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: *30225 2014/30225 2014*

Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		VA ExhXVIPremiums 30225	30225-VA	Revised	Previous State Filing Number: AERS-126909861 Percent Rate Change Request: 15	VA ExhXVI_Premiums_30225_20140530.pdf,

EXHIBIT XVI

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	54.30	40.16	101.54	75.58	127.52	94.46
41	54.30	40.16	101.54	75.58	127.52	94.46
42	54.30	40.16	101.54	75.58	127.52	94.46
43	54.30	40.16	101.54	75.58	127.52	94.46
44	54.30	40.16	101.54	75.58	127.52	94.46
45	54.30	40.16	101.54	75.58	127.52	94.46
46	59.04	44.86	106.26	80.28	134.60	101.54
47	59.04	44.86	108.62	80.28	136.94	101.54
48	61.38	44.86	110.96	82.66	139.32	103.90
49	61.38	47.24	110.96	85.00	141.70	106.26
50	63.76	47.24	113.34	85.00	144.02	108.62
51	66.12	49.58	118.04	89.74	148.76	113.34
52	70.84	51.96	122.80	92.06	155.82	118.04
53	73.18	54.30	127.52	96.80	162.90	122.80
54	77.92	59.04	134.60	101.54	172.38	129.84
55	87.36	66.12	148.76	113.34	191.26	144.02
56	94.46	73.18	162.90	125.14	207.78	162.90
57	103.90	80.28	177.08	136.94	226.68	174.74
58	115.72	89.74	195.96	148.76	247.94	191.26
59	129.84	96.80	214.88	162.90	273.90	207.78
60	144.02	113.34	236.12	186.54	299.88	236.12
61	160.58	129.84	266.82	217.24	335.28	271.54
62	177.08	139.32	290.42	231.38	368.36	290.42
63	203.06	165.28	332.92	269.14	420.30	340.00
64	229.06	179.46	373.08	292.82	469.86	370.70
65	255.02	207.78	408.46	332.92	514.72	420.30
66	278.62	221.98	439.18	351.80	554.88	443.90
67	309.30	245.58	484.04	384.88	606.84	481.68
68	340.00	278.62	526.54	429.74	658.76	536.00
69	382.50	302.22	585.58	465.16	729.60	578.50
70	422.64	335.28	642.22	510.00	795.74	632.82
71	462.80	366.00	694.18	550.16	852.38	677.64
72	507.64	403.76	757.94	604.46	918.48	731.98
73	564.30	453.36	828.76	665.86	994.04	800.42
74	620.98	500.60	906.68	729.60	999.98	861.82
75	689.48	547.80	999.98	795.74	999.98	923.22
76	769.74	609.18	999.98	871.28	999.98	998.76
77	859.46	687.10	999.98	975.16	999.98	999.98
78	951.54	757.94	999.98	999.98	999.98	999.98
79	999.98	833.50	999.98	999.98	999.98	999.98

EXHIBIT XVI

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	42.50	30.68	75.58	54.30	94.46	68.48
41	42.50	30.68	75.58	54.30	94.46	68.48
42	42.50	30.68	75.58	54.30	94.46	68.48
43	42.50	30.68	75.58	54.30	94.46	68.48
44	42.50	30.68	75.58	54.30	94.46	68.48
45	42.50	30.68	75.58	54.30	94.46	68.48
46	44.86	33.08	77.92	56.64	99.16	70.84
47	47.24	33.08	80.28	56.64	101.54	73.18
48	47.24	33.08	80.28	59.04	101.54	73.18
49	47.24	35.42	82.66	61.38	103.90	75.58
50	49.58	35.42	85.00	61.38	106.26	75.58
51	51.96	37.76	87.36	66.12	115.72	82.66
52	54.30	37.76	89.74	66.12	118.04	85.00
53	56.64	40.16	94.46	68.48	120.42	87.36
54	61.38	42.50	99.16	70.84	127.52	92.06
55	66.12	47.24	108.62	77.92	141.70	101.54
56	73.18	54.30	120.42	87.36	153.48	113.34
57	80.28	59.04	129.84	96.80	165.28	122.80
58	89.74	66.12	144.02	103.90	181.82	132.22
59	99.16	70.84	158.20	113.34	200.70	144.02
60	110.96	82.66	174.74	132.22	219.58	165.28
61	122.80	96.80	195.96	151.12	245.58	191.26
62	136.94	103.90	212.50	162.90	269.14	203.06
63	155.82	120.42	243.18	188.90	306.96	238.46
64	174.74	132.22	271.54	205.42	344.72	259.74
65	195.96	153.48	299.88	233.78	377.78	295.14
66	212.50	162.90	321.12	247.94	406.14	311.70
67	238.46	181.82	354.20	269.14	446.26	337.64
68	262.06	203.06	387.26	299.88	484.04	375.40
69	292.82	221.98	427.38	325.84	533.60	406.14
70	323.50	245.58	469.86	356.52	583.18	443.90
71	354.20	269.14	507.64	384.88	625.74	474.58
72	391.96	297.50	554.88	422.64	672.92	512.40
73	434.44	332.92	606.84	467.52	727.24	559.62
74	476.96	368.36	663.50	512.40	783.94	604.46
75	531.28	403.76	734.30	557.24	850.04	644.62
76	592.66	448.62	805.16	609.18	925.56	698.92
77	661.12	505.32	892.50	682.38	999.98	767.38
78	731.98	557.24	975.16	741.40	999.98	826.42
79	795.74	613.92	999.98	809.88	999.98	883.08
80		668.20		868.92		942.10
81		724.90		935.04		999.98
82		791.00		999.98		999.98
83		861.82		999.98		999.98
84		932.66		999.98		999.98

EXHIBIT XVI

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	37.76	28.36	66.12	49.58	82.66	61.38
41	37.76	28.36	66.12	49.58	82.66	61.38
42	37.76	28.36	66.12	49.58	82.66	61.38
43	37.76	28.36	66.12	49.58	82.66	61.38
44	37.76	28.36	66.12	49.58	82.66	61.38
45	37.76	28.36	66.12	49.58	82.66	61.38
46	40.16	30.68	68.48	51.96	87.36	66.12
47	40.16	30.68	70.84	54.30	89.74	68.48
48	42.50	30.68	73.18	54.30	92.06	68.48
49	42.50	33.08	73.18	56.64	92.06	70.84
50	44.86	33.08	75.58	56.64	94.46	70.84
51	47.24	35.42	77.92	59.04	99.16	77.92
52	47.24	35.42	80.28	61.38	101.54	80.28
53	51.96	37.76	85.00	63.76	108.62	85.00
54	54.30	40.16	89.74	68.48	113.34	87.36
55	59.04	44.86	96.80	73.18	125.14	94.46
56	66.12	49.58	106.26	82.66	136.94	103.90
57	73.18	56.64	115.72	89.74	148.76	115.72
58	80.28	61.38	129.84	99.16	165.28	125.14
59	89.74	68.48	141.70	108.62	181.82	136.94
60	99.16	77.92	155.82	122.80	198.36	155.82
61	110.96	89.74	174.74	141.70	219.58	177.08
62	122.80	96.80	191.26	151.12	243.18	191.26
63	141.70	113.34	221.98	179.46	278.62	224.30
64	158.20	125.14	245.58	193.62	309.30	243.18
65	174.74	144.02	269.14	219.58	337.64	276.26
66	191.26	153.48	288.08	231.38	361.28	290.42
67	214.88	170.00	318.76	252.66	401.38	318.76
68	238.46	193.62	349.46	283.34	436.82	356.52
69	264.46	210.16	384.88	306.96	479.32	382.50
70	290.42	231.38	422.64	335.28	524.20	415.56
71	316.38	250.26	453.36	358.90	557.24	441.54
72	351.80	280.96	500.60	399.06	606.84	481.68
73	391.96	316.38	550.16	441.54	661.12	531.28
74	429.74	344.72	597.38	481.68	703.62	566.70
75	476.96	377.78	658.76	521.80	762.66	606.84
76	528.88	417.94	717.80	569.04	824.04	651.70
77	595.02	476.96	805.16	642.22	906.68	724.90
78	663.50	528.88	883.08	703.62	982.24	781.54
79	715.42	576.12	944.48	760.28	999.98	835.84
80		618.64		805.16		887.80
81		668.20		861.82		946.84
82		717.80		918.48		999.98
83		765.04		972.80		999.98
84		807.54		999.98		999.98

EXHIBIT XVI

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	33.08	23.60	56.64	42.50	70.84	51.96
41	33.08	23.60	56.64	42.50	70.84	51.96
42	33.08	23.60	56.64	42.50	70.84	51.96
43	33.08	23.60	56.64	42.50	70.84	51.96
44	33.08	23.60	56.64	42.50	70.84	51.96
45	33.08	23.60	56.64	42.50	70.84	51.96
46	33.08	25.96	59.04	44.86	73.18	54.30
47	35.42	25.96	61.38	44.86	75.58	56.64
48	35.42	25.96	61.38	44.86	75.58	56.64
49	35.42	25.96	61.38	44.86	77.92	59.04
50	37.76	28.36	63.76	47.24	80.28	63.76
51	37.76	28.36	66.12	49.58	82.66	66.12
52	40.16	30.68	68.48	51.96	87.36	68.48
53	42.50	33.08	70.84	54.30	89.74	70.84
54	44.86	33.08	75.58	56.64	96.80	70.84
55	49.58	37.76	82.66	61.38	106.26	80.28
56	56.64	40.16	92.06	66.12	118.04	85.00
57	61.38	47.24	99.16	75.58	127.52	96.80
58	68.48	51.96	108.62	82.66	139.32	106.26
59	75.58	56.64	120.42	92.06	151.12	115.72
60	87.36	63.76	136.94	101.54	172.38	127.52
61	94.46	70.84	148.76	110.96	186.54	139.32
62	106.26	80.28	167.64	127.52	212.50	160.58
63	120.42	87.36	186.54	136.94	236.12	172.38
64	139.32	99.16	214.88	155.82	271.54	195.96
65	153.48	110.96	233.78	170.00	295.14	214.88
66	172.38	122.80	259.74	186.54	325.84	233.78
67	188.90	134.60	280.96	198.36	354.20	250.26
68	207.78	151.12	306.96	221.98	382.50	276.26
69	226.68	162.90	330.58	236.12	413.20	295.14
70	245.58	179.46	354.20	259.74	439.18	321.12
71	269.14	195.96	384.88	278.62	474.58	342.38
72	292.82	212.50	415.56	302.22	505.32	366.00
73	318.76	233.78	443.90	328.22	533.60	394.28
74	349.46	257.38	484.04	356.52	571.38	420.30
75	384.88	278.62	531.28	384.88	613.92	446.26
76	425.02	309.30	578.50	420.30	665.86	481.68
77	472.24	344.72	637.52	465.16	715.42	524.20
78	519.48	380.16	691.82	507.64	769.74	564.30
79	569.04	415.56	753.18	547.80	821.70	609.18
80		453.36		590.30		654.02
81		495.84		637.52		706.00
82		540.68		687.10		760.28
83		590.30		741.40		816.96
84		644.62		800.42		878.38

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: 30225 2014/30225 2014

Supporting Document Schedules

Satisfied - Item:	Certification of Compliance
Comments:	Please see Actuarial Memorandom
Attachment(s):	
Item Status:	Received & Acknowledged
Status Date:	01/15/2014

Satisfied - Item:	L&H Actuarial Memorandum
Comments:	
Attachment(s):	VA Revised_ActMem_30225_20140530.pdf
Item Status:	Received & Acknowledged
Status Date:	12/03/2014

Satisfied - Item:	Cover Letter and Third Party Document
Comments:	
Attachment(s):	VA CovLtr_30225_20140110.pdf Milliman_Involvement_VA_30225_20140110.pdf
Item Status:	Received & Acknowledged
Status Date:	01/15/2014

Satisfied - Item:	Rate Revision Checklist
Comments:	
Attachment(s):	VA Rate_Revision_Checklist_30225_20140110.pdf
Item Status:	Received & Acknowledged
Status Date:	01/15/2014

Satisfied - Item:	Response 2-19-14
Comments:	
Attachment(s):	VA Rate Request Summary_30225_20140219.pdf VA Response_30225_20140219.pdf VA Response_Attachments_30225_20140219.xlsx LTC Rate Increase Policyholder Q&A.pdf Sample LTC Policyholder Notification Letter - On Waiver.pdf Sample LTC Policyholder Notification Letter - Not On Waiver.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: *30225 2014/30225 2014*

Satisfied - Item:	Response 5-30-14
Comments:	
Attachment(s):	VA Response_30225_20140530.pdf VA Rate Request Summary_30225_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: 30225 2014/30225 2014

Attachment VA Response_Attachments_30225_20140219.xlsx is not a PDF document and cannot be reproduced here.

RIVERSOURCE LIFE INSURANCE COMPANY

Address: 227 Ameriprise Financial Center, Minneapolis MN 55474

Actuarial Memorandum for 30225 Series

May 2014

Policy form 30225-VA is an individual policy form providing benefits to individuals for confinement in a nursing home. This form was issued in Virginia from January 15, 1993 through January 15, 2001.

1. Purpose of Filing

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

2. Description of Benefits

This is an individually underwritten policy form which pays a daily benefit for confinement in a nursing home. Benefits are payable under skilled, intermediate or custodial levels of care. Hospital confinement is not a pre-requisite for benefit entitlement.

The confinement daily benefit is selected at issue. The maximum period for which confinement benefits are payable is also selected at issue. The choices are: 730 days (2 years), 1,095 days (3 years), 1,460 days (4 years), and unlimited. This policy also pays 60% of the confinement daily benefit for stays in a qualified Assisted Living Facility (ALF). A qualified ALF is one that has a minimum of 10 inpatients and has a 24-hour awake, trained, and ready to respond staff.

Confinement benefit payments commence after an elimination period of 20 days or 100 days, depending on the plan initially chosen. During the continuation of confinement benefit payments, the premiums are waived after 90 days.

Benefit eligibility for nursing home coverage is based on any one of the following: sickness or injury (1996 and prior issues only), 2 or more Activities of Daily Living (ADL) deficiencies out of 5 ADLs, or cognitive impairment. As defined in the policy, the 5 ADLs are: Continence, Dressing, Feeding, Toileting, and Transferring. Benefit eligibility for ALF coverage is based on 2 or more out of 5 ADL deficiencies or cognitive impairment.

If temporary hospitalization is required during a period of confinement in a nursing home or an ALF, and there is a charge for reserving a bed in the facility, this policy will pay the daily benefit for up to 21 days during any confinement period.

At issue, the insured may choose to elect either the Simple Benefit Increase Option or the Compound Benefit Increase Option. The Simple Benefit Increase Option will increase the original daily limits by a fixed amount (5% of the original maximum daily benefits) each year from the second year on for life. The Compound Benefit Increase Option will increase the previous year's daily limits by 5% per year from the second year on for life. The increasing benefits apply even when the policy is in claim status.

3. Renewability

This policy form is guaranteed renewable for life.

4. Applicability

This filing is applicable to inforce policies only, as this policy form is no longer being sold in the market. The premium changes will apply to the base form but not the optional home care rider or the optional nonforfeiture benefit 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.

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

Starting in 1989, RiverSource Life marketed nursing home policies with a zero day prior hospitalization requirement. Using the emerging experience on this business, statistics from the "1985 National Nursing Home Survey" published by the National Center for Health Statistics, and input provided from RiverSource Life's reinsurer, both the expected frequencies and expected severities of claims for the non-increasing benefit were developed. It should be noted that considerable judgment was made with regard to the frequency and severity of claims, especially for the ALF benefit.

Claim costs for the Benefit Increase Options are based on these claim costs with the benefit loaded to reflect the scheduled increases in benefits.

Actual-to-expected adjustment factors were developed from actual emerging experience through anniversaries ending December 2012 and are shown in the following tables:

RIVERSOURCE LIFE INSURANCE COMPANY

Address: 227 Ameriprise Financial Center, Minneapolis MN 55474

Actuarial Memorandum for 30225 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	0.05	0.40	1.00	0.90	1.00	1.00	1.85
2	0.10	0.45	1.00	0.95	1.00	2.40	1.85
3	0.15	0.45	1.00	1.40	1.50	2.40	1.85
4	0.20	0.45	1.00	1.40	2.00	2.15	1.85
5	0.25	0.55	1.00	1.40	2.00	2.15	1.85
6	0.30	0.55	1.00	1.40	2.00	2.00	1.85
7	0.35	0.55	1.00	1.40	2.00	2.00	1.85
8	0.40	0.55	1.00	1.40	2.00	1.70	1.85
9	0.45	0.60	1.00	1.40	1.75	1.75	1.85
10	0.45	0.65	1.00	1.40	1.60	1.75	1.85
11	0.45	0.65	1.00	1.40	1.60	1.85	1.85
12	0.55	0.65	1.00	1.40	1.60	1.70	1.85
13	0.55	0.65	1.00	1.40	1.60	1.70	1.85
14	0.55	0.65	1.00	1.40	1.60	1.70	1.85
15	0.65	0.70	1.10	1.40	1.60	1.70	1.85
16	0.65	0.70	1.15	1.40	1.60	1.70	1.85
17	0.65	0.70	1.15	1.40	1.60	1.70	1.85
18	0.70	0.70	1.15	1.40	1.60	1.70	1.85
19	0.70	0.70	1.15	1.40	1.60	1.70	1.85
20	0.75	0.75	1.15	1.40	1.60	1.70	1.85
21	0.75	0.75	1.20	1.40	1.60	1.70	1.85
22	0.75	0.75	1.20	1.40	1.60	1.70	1.85
23	0.75	0.80	1.20	1.40	1.60	1.70	1.85
24	0.80	0.80	1.25	1.40	1.60	1.70	1.85
25	0.80	0.85	1.25	1.40	1.60	1.70	1.85
26	0.85	0.85	1.25	1.40	1.60	1.70	1.85
27	0.85	0.90	1.25	1.40	1.60	1.70	1.85
28	0.85	0.90	1.25	1.40	1.60	1.70	1.85
29	0.90	0.95	1.25	1.40	1.60	1.70	1.85
30+	1.00	1.00	1.25	1.40	1.60	1.70	1.85

RIVERSOURCE LIFE INSURANCE COMPANY

Address: 227 Ameriprise Financial Center, Minneapolis MN 55474

Actuarial Memorandum for 30225 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	0.10	0.30	0.55	0.45	0.70	1.35	1.00	2.00
2	0.10	0.30	0.55	0.50	0.75	1.35	1.00	2.00
3	0.10	0.30	0.55	0.75	0.80	1.35	1.90	2.00
4	0.20	0.30	0.60	0.75	0.85	1.35	1.90	2.00
5	0.20	0.30	0.60	0.75	0.90	1.35	1.90	2.00
6	0.20	0.30	0.70	0.75	0.95	1.35	1.90	2.00
7	0.30	0.30	0.70	0.75	1.00	1.35	1.50	2.00
8	0.35	0.30	0.70	0.75	1.05	1.35	1.50	1.50
9	0.40	0.30	0.70	0.75	1.05	1.35	1.50	1.50
10	0.40	0.30	0.70	1.00	1.10	1.35	1.50	1.50
11	0.45	0.30	0.70	1.00	1.10	1.35	1.50	1.75
12	0.45	0.35	0.70	1.05	1.15	1.35	1.50	1.75
13	0.45	0.40	0.70	1.05	1.15	1.35	1.50	1.75
14	0.45	0.45	0.90	1.05	1.20	1.35	1.50	1.75
15	0.45	0.55	0.95	1.10	1.20	1.40	1.50	1.90
16	0.45	0.65	1.00	1.10	1.20	1.40	1.50	1.90
17	0.45	0.65	1.00	1.10	1.30	1.40	1.50	1.90
18	0.50	0.75	1.00	1.15	1.35	1.40	1.50	1.90
19	0.50	0.75	1.00	1.15	1.35	1.40	1.50	1.90
20	0.55	0.75	1.00	1.15	1.35	1.40	1.50	1.90
21	0.60	0.75	1.00	1.15	1.35	1.40	1.50	2.00
22	0.65	0.75	1.00	1.15	1.35	1.40	1.50	2.00
23	0.70	0.75	1.00	1.15	1.35	1.40	1.50	2.00
24	0.75	0.75	1.00	1.15	1.35	1.40	1.50	2.00
25	0.75	0.85	1.00	1.15	1.35	1.40	1.50	2.00
26	0.80	0.85	1.00	1.15	1.35	1.40	1.50	2.00
27	0.90	0.85	1.00	1.15	1.35	1.40	1.50	2.00
28	0.90	0.90	1.00	1.15	1.35	1.40	1.50	2.00
29	0.95	0.95	1.00	1.15	1.35	1.40	1.50	2.00
30	0.95	0.95	1.00	1.15	1.35	1.40	1.50	2.00
31	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
32	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
33	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
34	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
35+	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00

Morbidity used in the projections has also been reduced by 5% for anticipated improved claim experience from changes in claim management starting in 2003.

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 100.3%. This experience is based on 7,490 actual claims (4,047 lifetime and 3,743 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 30225, 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.

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.

<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 2012. 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 was used in the development of the current selection factors, subject to the constraints that the factors must be non-decreasing by duration and cannot exceed 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 23 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 36,342 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 1.3% of inforce policyholders is assumed to lapse, and a 0.7% 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 2012. 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 34,804 lapses, including 10,269 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 2.0% in the year of rate increase notification to policyholders grading down to 0% in the 3rd 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, 2011 and 2013 so that total commissions paid before and after 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 this particular policy form; 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 2007 rate increase filing, Exhibit VIII provides the

assumptions used in the 2009 rate increase filing and Exhibit IX provides the assumptions used in the 2011 rate increase filing.

6. Marketing Method

This policy form was marketed by agents of RiverSource Life.

7. Underwriting Description

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

8. Premiums

Premiums are unisex and payable for life. The premiums vary by issue age, the benefit limit, the initial daily benefit, the elimination period, and the Benefit Increase Option.

9. Issue Age Range

The issue ages are from 40 to 79 except for the benefit structure with 100-day elimination period, non-lifetime benefits, 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 9/30/2013) are applied to the annual premium (AP):

Premium Mode	Modal Factors	Percent Distribution
Annual	1.0000*AP + 0.0	42.8%
Semi-Annual	0.5020*AP+ 0.4	9.3%
Quarterly	0.2580*AP+ 0.5	8.5%
Monthly	0.0868*AP+ 0.6	39.4%

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 XII and XIII.

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 30225 is shown in Exhibit X, and Virginia experience for policy form 30225-VA is shown in Exhibit XI. Exhibit XII shows nationwide past experience including earned premiums, incurred claims, increase in active life reserves and incurred loss ratios by calendar year, and Exhibit XIII 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:

$$ILR_j = \frac{\sum_k \sum_t {}_jPmt_t^k * v^{t-k} + \sum_k ({}_jCR_{ValDate}^k + {}_jIBNR_{ValDate}^k) * v^{ValDate-k}}{EP_j}$$

ILR_j = incurred loss ratio for year *j*

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

${}_jCR_{ValDate}^k$ = open claim reserve held on September 30, 2013 for claims incurred at time *k* in year *j*

${}_jIBNR_{ValDate}^k$ = incurred but not reported reserve as of September 30, 2013 attributable to claims incurred at time *k* in year *j*

EP_j = earned premium in year *j*

ValDate = September 30, 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 X through XIII 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 X through XIII 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 are as of September 30, 2013 and are calculated as the sum of accumulated historical experience and discounted future experience where accumulation and discounting of the total for each calendar year occur at 5.0%, an interest rate consistent with that assumed in the determination of premiums at the time of original pricing, and assume mid-year values.

The incurred loss ratio in Exhibits XII and XIII 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

Four prior increases have been approved and implemented on this form. A 35% increase was approved in October 2005 and implemented on each contract's next policy anniversary beginning in March 2006. A 15% increase was approved in May 2008 and implemented on each contract's next policy anniversary beginning in August 2008. A 15% increase was approved in May 2009 and implemented on each contract's next policy anniversary beginning in August 2009. A 15% increase was approved in May 2012 and implemented on each contract's next policy anniversary beginning in October 2012. The actual and projected premiums in Exhibits XI and XIII reflect the impact of these increases.

The actual and projected premiums in Exhibits X and XII reflect the accumulated rate increases as approved in Virginia and implemented from 2005 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 15%.

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

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

17. Virginia Average Annual Premium (Nursing Home Annual Premium Based on September 30, 2013 Inforce)

Before increase: $1,354
After increase: $1,556

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 9/30/2013 (based on inforce count)

By Issue Age:

Issue Ages	Percent Distribution
<55	31.0%
55-59	28.0%
60-64	23.3%
65-69	11.9%
70-74	4.7%
75-79	1.0%
>79	0.1%

By Elimination Period:

Elimination Period	Percent Distribution
20-day	19.4%
100-day	80.6%

By Benefit Period:

Benefit Period	Percent Distribution
2-Year	2.3%
3-Year	8.4%
4-Year	20.8%
Unlimited	68.5%

By Inflation Protection Option:

Inflation Option	Percent Distribution
None	14.1%
Simple	39.2%
Compound	46.7%

20. Number of Policyholders

As of 9/30/2013, 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	1,944	$2,631,609
Nationwide	46,237	$66,375,111

RIVERSOURCE LIFE INSURANCE COMPANY

Address: 227 Ameriprise Financial Center, Minneapolis MN 55474

Actuarial Memorandum for 30225 Series

May 2014

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 Form: 30225-VA

Original Pricing Assumptions

Mortality: 1983 Individual Annuitant Mortality Table

Lapse Rates:

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

Morbidity: Starting in 1989, RiverSource Life marketed nursing home policies with a zero day prior hospitalization requirement. Using the emerging experience on this business, statistics from the "1985 National Nursing Home Survey" published by the National Center for Health Statistics, and input provided from RiverSource Life's reinsurer, both the expected frequencies and expected severities of claims for the non-increasing benefit were developed. It should be noted that considerable judgment was made with regard to the frequency and severity of claims, especially for the Assisted Living Facility benefit. Claim costs for the Benefit Increase Options are based on these claim costs with the benefit loaded to reflect the scheduled increases in benefits.

The following selection factors were used:

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

Interest Rate: 5%

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

Policy Form: 30225-VA

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%	66%	71%	73%	88%
10	55%	66%	66%	74%	73%	88%
11	57%	67%	71%	78%	74%	88%
12	57%	67%	72%	78%	90%	89%
13	57%	67%	75%	83%	90%	92%
14	57%	68%	77%	89%	90%	95%
15	57%	69%	78%	90%	95%	98%
16	64%	69%	81%	90%	95%	100%
17	67%	69%	81%	91%	100%	100%
18	70%	70%	84%	95%	100%	100%
19	72%	70%	85%	96%	100%	100%
20	72%	73%	86%	97%	100%	100%
21	75%	75%	88%	100%	100%	100%
22	80%	77%	90%	100%	100%	100%
23	80%	80%	95%	100%	100%	100%
24	85%	82%	95%	100%	100%	100%
25	85%	85%	100%	100%	100%	100%
26	85%	90%	100%	100%	100%	100%
27	87%	90%	100%	100%	100%	100%
28	87%	95%	100%	100%	100%	100%
29	90%	95%	100%	100%	100%	100%
30	90%	100%	100%	100%	100%	100%
31	90%	100%	100%	100%	100%	100%
32	95%	100%	100%	100%	100%	100%
33	95%	100%	100%	100%	100%	100%
34	95%	100%	100%	100%	100%	100%
35+	100%	100%	100%	100%	100%	100%

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

Policy Form: 30225-VA

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%	1.2%	1.3%
11	0.8%	1.0%	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%	1.3%	1.8%
19	0.7%	1.3%	1.8%
20	0.8%	1.3%	1.9%
21	0.8%	1.3%	1.9%
22	0.8%	1.3%	2.0%
23	0.8%	1.3%	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 1.3% of inforce policyholders is assumed to lapse, and a 0.7% 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 Form: 30225-VA

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 2012. 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	0.05	0.40	1.00	0.90	1.00	1.00	1.85
2	0.10	0.45	1.00	0.95	1.00	2.40	1.85
3	0.15	0.45	1.00	1.40	1.50	2.40	1.85
4	0.20	0.45	1.00	1.40	2.00	2.15	1.85
5	0.25	0.55	1.00	1.40	2.00	2.15	1.85
6	0.30	0.55	1.00	1.40	2.00	2.00	1.85
7	0.35	0.55	1.00	1.40	2.00	2.00	1.85
8	0.40	0.55	1.00	1.40	2.00	1.70	1.85
9	0.45	0.60	1.00	1.40	1.75	1.75	1.85
10	0.45	0.65	1.00	1.40	1.60	1.75	1.85
11	0.45	0.65	1.00	1.40	1.60	1.85	1.85
12	0.55	0.65	1.00	1.40	1.60	1.70	1.85
13	0.55	0.65	1.00	1.40	1.60	1.70	1.85
14	0.55	0.65	1.00	1.40	1.60	1.70	1.85
15	0.65	0.70	1.10	1.40	1.60	1.70	1.85
16	0.65	0.70	1.15	1.40	1.60	1.70	1.85
17	0.65	0.70	1.15	1.40	1.60	1.70	1.85
18	0.70	0.70	1.15	1.40	1.60	1.70	1.85
19	0.70	0.70	1.15	1.40	1.60	1.70	1.85
20	0.75	0.75	1.15	1.40	1.60	1.70	1.85
21	0.75	0.75	1.20	1.40	1.60	1.70	1.85
22	0.75	0.75	1.20	1.40	1.60	1.70	1.85
23	0.75	0.80	1.20	1.40	1.60	1.70	1.85
24	0.80	0.80	1.25	1.40	1.60	1.70	1.85
25	0.80	0.85	1.25	1.40	1.60	1.70	1.85
26	0.85	0.85	1.25	1.40	1.60	1.70	1.85
27	0.85	0.90	1.25	1.40	1.60	1.70	1.85
28	0.85	0.90	1.25	1.40	1.60	1.70	1.85
29	0.90	0.95	1.25	1.40	1.60	1.70	1.85
30+	1.00	1.00	1.25	1.40	1.60	1.70	1.85

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

Policy Form: 30225-VA

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	0.10	0.30	0.55	0.45	0.70	1.35	1.00	2.00
2	0.10	0.30	0.55	0.50	0.75	1.35	1.00	2.00
3	0.10	0.30	0.55	0.75	0.80	1.35	1.90	2.00
4	0.20	0.30	0.60	0.75	0.85	1.35	1.90	2.00
5	0.20	0.30	0.60	0.75	0.90	1.35	1.90	2.00
6	0.20	0.30	0.70	0.75	0.95	1.35	1.90	2.00
7	0.30	0.30	0.70	0.75	1.00	1.35	1.50	2.00
8	0.35	0.30	0.70	0.75	1.05	1.35	1.50	1.50
9	0.40	0.30	0.70	0.75	1.05	1.35	1.50	1.50
10	0.40	0.30	0.70	1.00	1.10	1.35	1.50	1.50
11	0.45	0.30	0.70	1.00	1.10	1.35	1.50	1.75
12	0.45	0.35	0.70	1.05	1.15	1.35	1.50	1.75
13	0.45	0.40	0.70	1.05	1.15	1.35	1.50	1.75
14	0.45	0.45	0.90	1.05	1.20	1.35	1.50	1.75
15	0.45	0.55	0.95	1.10	1.20	1.40	1.50	1.90
16	0.45	0.65	1.00	1.10	1.20	1.40	1.50	1.90
17	0.45	0.65	1.00	1.10	1.30	1.40	1.50	1.90
18	0.50	0.75	1.00	1.15	1.35	1.40	1.50	1.90
19	0.50	0.75	1.00	1.15	1.35	1.40	1.50	1.90
20	0.55	0.75	1.00	1.15	1.35	1.40	1.50	1.90
21	0.60	0.75	1.00	1.15	1.35	1.40	1.50	2.00
22	0.65	0.75	1.00	1.15	1.35	1.40	1.50	2.00
23	0.70	0.75	1.00	1.15	1.35	1.40	1.50	2.00
24	0.75	0.75	1.00	1.15	1.35	1.40	1.50	2.00
25	0.75	0.85	1.00	1.15	1.35	1.40	1.50	2.00
26	0.80	0.85	1.00	1.15	1.35	1.40	1.50	2.00
27	0.90	0.85	1.00	1.15	1.35	1.40	1.50	2.00
28	0.90	0.90	1.00	1.15	1.35	1.40	1.50	2.00
29	0.95	0.95	1.00	1.15	1.35	1.40	1.50	2.00
30	0.95	0.95	1.00	1.15	1.35	1.40	1.50	2.00
31	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
32	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
33	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
34	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
35+	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00

The following adverse selection factors are used:

Year of Policyholder Notification *	Without Current Requested Increase	With Current Requested Increase
1	0.0%	2.0%
2	0.0%	1.0%
3	0.0%	0.0%

* For currently requested increase

Interest Rate: 5.0%

EXHIBIT II
RiverSource Life Insurance Company
Nationwide Nursing Home Claim Experience
For Policy Anniversaries through 2012
Policy Form: 30225
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	1,863,075	2,193,535	84.9%	1,467,066	1,973,522	74.3%	3,330,141	4,167,057	79.9%
2	4,856,478	3,960,658	122.6%	2,511,818	2,713,214	92.6%	7,368,296	6,673,872	110.4%
3	7,232,029	6,241,058	115.9%	4,966,626	4,508,353	110.2%	12,198,655	10,749,411	113.5%
4	11,955,778	8,652,100	138.2%	5,992,132	5,812,163	103.1%	17,947,910	14,464,263	124.1%
5	13,610,766	11,373,470	119.7%	7,378,120	7,379,805	100.0%	20,988,886	18,753,275	111.9%
6	11,973,449	14,274,994	83.9%	10,445,158	9,312,070	112.2%	22,418,607	23,587,064	95.0%
7	18,564,702	18,060,929	102.8%	11,007,279	10,762,635	102.3%	29,571,981	28,823,563	102.6%
8	18,564,278	19,665,901	94.4%	10,712,973	11,509,612	93.1%	29,277,251	31,175,513	93.9%
9	24,250,429	21,416,469	113.2%	12,495,019	12,237,030	102.1%	36,745,448	33,653,498	109.2%
10	25,548,818	23,318,750	109.6%	13,731,710	13,600,111	101.0%	39,280,528	36,918,861	106.4%
11	25,658,210	26,207,320	97.9%	15,881,133	14,454,135	109.9%	41,539,343	40,661,455	102.2%
12	30,969,905	28,764,316	107.7%	15,905,146	15,640,710	101.7%	46,875,051	44,405,026	105.6%
13	28,976,360	31,893,835	90.9%	15,424,893	16,517,540	93.4%	44,401,253	48,411,375	91.7%
14	37,741,406	34,965,703	107.9%	14,129,029	18,042,869	78.3%	51,870,436	53,008,573	97.9%
15	33,097,574	36,885,934	89.7%	18,664,928	18,428,122	101.3%	51,762,502	55,314,056	93.6%
16	31,814,279	33,059,957	96.2%	17,778,919	16,623,767	106.9%	49,593,198	49,683,723	99.8%
17	21,425,470	22,668,301	94.5%	10,711,841	11,518,752	93.0%	32,137,311	34,187,052	94.0%
18	12,458,247	13,431,216	92.8%	6,813,551	6,517,962	104.5%	19,271,797	19,949,178	96.6%
19	4,802,557	5,480,139	87.6%	3,010,230	2,530,808	118.9%	7,812,787	8,010,946	97.5%
20	0	3,524	0.0%	0	0	0.0%	0	3,524	0.0%
Total	**365,363,811**	**362,518,109**	**100.8%**	**199,027,571**	**200,083,179**	**99.5%**	**564,391,382**	**562,601,288**	**100.3%**

SPLIT BY ISSUE AGE				
Issue Age	Actual	Expected	A/E	Claim Count
<43	0	179,683	0.0%	0
43-47	1,204,571	1,017,788	118.4%	5
48-52	8,953,935	7,392,336	121.1%	77
53-57	26,140,224	26,345,248	99.2%	262
58-62	79,441,062	79,138,125	100.4%	871
63-67	131,886,980	131,807,276	100.1%	1,634
68-72	148,238,759	146,413,747	101.2%	2,046
73-77	113,321,954	114,828,509	98.7%	1,772
78-82	46,500,688	46,507,990	100.0%	911
83+	8,703,210	8,970,585	97.0%	212
Total	**564,391,382**	**562,601,288**	**100.3%**	**7,790**

EXHIBIT III
RiverSource Life Insurance Company
Long-Term Care Mortality Experience
For Policy Anniversaries in 2000 through Policy Anniversaries in 2012
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	2,157	2,175	99%	(18)
10	2,623	2,643	99%	(20)
11	3,087	3,058	101%	29
12	3,143	3,190	99%	(47)
13	3,099	3,107	100%	(8)
14	2,889	2,926	99%	(37)
15	2,644	2,685	98%	(41)
16	2,455	2,504	98%	(49)
17	2,079	2,093	99%	(14)
18	1,751	1,745	100%	6
19	1,430	1,432	100%	(2)
20	1,110	1,144	97%	(34)
21	854	851	100%	3
22	524	494	106%	30
23	90	80	113%	10
Total	**36,342**	**36,459**	**100%**	**(117)**

SUMMARY BY ISSUE AGE				
Issue Age	Actual Deaths	Expected Deaths	A/E	Difference
<43	22	21	105%	1
43-47	115	126	91%	(11)
48-52	853	852	100%	1
53-57	2,534	2,513	101%	21
58-62	5,821	5,831	100%	(10)
63-67	8,947	9,047	99%	(100)
68-72	9,019	9,023	100%	(4)
73-77	6,112	6,124	100%	(12)
78-82	2,545	2,552	100%	(7)
83+	374	372	101%	2
Total	**36,342**	**36,459**	**100%**	**(117)**

SUMMARY BY ALL DURATION / ISSUE AGE CELLS			
Actual Deaths	Expected Deaths	A/E	Difference
36,342	**36,459**	**100%**	**(117)**

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	2012	
< 10%	6.8%			0.9%	1.5%	1.7%	0.9%	1.2%	1.1%	1.2%
10% - 19.9%	13.6%	0.7%	2.1%	1.4%	1.7%	1.8%	1.4%	1.3%	1.2%	1.5%
20% - 29.9%	24.5%	1.8%	1.7%	1.2%	1.6%	2.5%		4.4%	2.6%	1.8%
30%+	25.5%	2.9%	2.7%	2.4%	2.8%	2.3%	1.4%	1.6%		2.6%
Total	16.4%	2.6%	2.5%	1.3%	1.8%	1.9%	1.4%	1.3%	1.2%	1.8%

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	2012	
< 10%	6.8%			0.3%	0.2%	0.2%	0.4%	0.3%	0.3%	0.2%
10% - 19.9%	13.6%	0.9%	0.8%	0.6%	0.6%	0.7%	0.5%	0.7%	0.6%	0.6%
20% - 29.9%	24.5%	1.8%	1.8%	1.9%	1.5%	2.7%		1.9%	1.1%	1.7%
30%+	25.5%	2.3%	2.1%	2.0%	1.9%	1.8%	1.4%	1.1%	1.9%	2.0%
Total	16.4%	1.4%	1.3%	0.8%	0.7%	0.8%	0.7%	0.9%	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 2012
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			
Duration	Lapses	Actual Exposure	Rate	Expected Lapses	Lapses	Actual Exposure	Rate	Expected Lapses	Lapses	Actual Exposure	Rate	Expected Lapses	Lapses	Actual Exposure	Rate	Expected 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	498	47,453	1.0%	1.1%	187	17,441	1.1%	1.1%	31	2,893	1.1%	1.3%	716	67,788	1.1%	1.1%
10	371	42,329	0.9%	0.8%	212	17,547	1.2%	1.2%	32	2,935	1.1%	1.3%	615	62,811	1.0%	1.0%
11	331	39,397	0.8%	0.8%	194	18,968	1.0%	1.0%	34	3,279	1.0%	1.4%	559	61,644	0.9%	0.9%
12	217	32,431	0.7%	0.7%	149	17,451	0.9%	0.9%	43	2,942	1.5%	1.5%	409	52,823	0.8%	0.8%
13	182	26,176	0.7%	0.7%	134	15,027	0.9%	0.9%	31	2,387	1.3%	1.5%	347	43,591	0.8%	0.8%
14	148	22,259	0.7%	0.7%	101	12,195	0.8%	0.9%	30	1,780	1.7%	1.6%	279	36,234	0.8%	0.8%
15	106	16,998	0.6%	0.7%	84	9,045	0.9%	0.9%	19	1,209	1.6%	1.6%	209	27,251	0.8%	0.8%
16	81	12,238	0.7%	0.7%	73	6,755	1.1%	1.0%	22	821	2.7%	1.7%	176	19,814	0.9%	0.8%
17	61	9,165	0.7%	0.7%	65	5,796	1.1%	1.1%	15	644	2.3%	1.7%	141	15,604	0.9%	0.9%
18	35	6,338	0.6%	0.7%	57	4,358	1.3%	1.3%	13	437	3.0%	1.8%	105	11,132	0.9%	0.9%
19	25	3,787	0.7%	0.7%	36	2,662	1.4%	1.3%	4	228	1.8%	1.8%	65	6,677	1.0%	0.9%
20	17	2,704	0.6%	0.8%	28	1,993	1.4%	1.3%	3	146	2.1%	1.9%	48	4,843	1.0%	1.0%
21	20	2,375	0.8%	0.8%	22	1,995	1.1%	1.3%	3	131	2.3%	1.9%	45	4,501	1.0%	1.0%
22	21	2,021	1.0%	0.8%	19	1,702	1.1%	1.3%	3	116	2.6%	2.0%	43	3,839	1.1%	1.0%
23	3	308	1.0%	0.8%	3	256	1.2%	1.3%	0	18	0.0%	2.0%	6	582	1.0%	0.0%
All Durations	**11,665**	**587,303**	**2.0%**	**2.0%**	**3,341**	**223,866**	**1.5%**	**1.5%**	**565**	**34,224**	**1.7%**	**1.6%**	**15,571**	**845,393**	**1.8%**	**1.8%**
Durations 8 and later	**2,666**	**316,892**	**0.8%**	**0.8%**	**1,559**	**150,543**	**1.0%**	**1.0%**	**321**	**22,837**	**1.4%**	**1.5%**	**4,546**	**490,271**	**0.9%**	**0.9%**

NON-LIFETIME BENEFIT PERIOD																
	Issue Ages 35-62				Issue Ages 63-72				Issue Ages 73+				All Issue Ages			
Duration	Lapses	Actual Exposure	Rate	Expected Lapses	Lapses	Actual Exposure	Rate	Expected Lapses	Lapses	Actual Exposure	Rate	Expected Lapses	Lapses	Actual Exposure	Rate	Expected 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	386	36,096	1.1%	1.2%	292	21,699	1.3%	1.3%	156	6,334	2.5%	2.7%	834	64,129	1.3%	1.4%
10	278	30,401	0.9%	1.0%	225	20,064	1.1%	1.3%	187	5,878	3.2%	3.4%	690	56,343	1.2%	1.3%
11	224	24,545	0.9%	1.0%	287	19,180	1.5%	1.5%	203	5,650	3.6%	3.9%	714	49,376	1.4%	1.5%
12	192	19,493	1.0%	0.9%	240	16,915	1.4%	1.5%	187	4,761	3.9%	4.0%	619	41,169	1.5%	1.5%
13	130	15,218	0.9%	0.8%	206	14,042	1.5%	1.5%	152	3,694	4.1%	4.4%	488	32,954	1.5%	1.5%
14	89	11,010	0.8%	0.8%	156	10,943	1.4%	1.5%	142	2,649	5.4%	4.8%	387	24,602	1.6%	1.5%
15	53	7,472	0.7%	0.7%	141	7,932	1.8%	1.6%	81	1,717	4.7%	4.9%	275	17,122	1.6%	1.6%
16	42	5,885	0.7%	0.7%	114	6,035	1.9%	1.8%	74	1,217	6.1%	5.4%	230	13,136	1.8%	1.7%
17	37	4,228	0.9%	0.8%	100	4,793	2.1%	2.0%	47	895	5.3%	5.4%	184	9,916	1.9%	1.8%
18	29	2,871	1.0%	0.8%	64	3,472	1.8%	2.2%	32	566	5.7%	5.4%	125	6,908	1.8%	1.9%
19	18	1,937	0.9%	0.9%	54	2,241	2.4%	2.4%	15	303	5.0%	5.4%	87	4,481	1.9%	2.0%
20	16	1,341	1.2%	0.9%	49	1,597	3.1%	2.6%	7	186	3.8%	5.4%	72	3,124	2.3%	2.0%
21	12	978	1.2%	0.9%	48	1,352	3.6%	2.8%	10	154	6.5%	5.4%	70	2,483	2.8%	2.2%
22	4	639	0.6%	0.9%	26	920	2.8%	3.0%	11	85	13.0%	5.4%	41	1,643	2.5%	2.3%
23	2	134	1.5%	1.0%	8	155	5.1%	3.2%	0	7	0.0%	5.4%	10	296	3.4%	0.0%
All Durations	**11,028**	**459,558**	**2.4%**	**2.4%**	**5,816**	**273,242**	**2.1%**	**2.1%**	**2,389**	**73,562**	**3.2%**	**3.3%**	**19,233**	**806,361**	**2.4%**	**2.4%**
Durations 8 and later	**1,943**	**199,135**	**1.0%**	**1.0%**	**2,326**	**153,346**	**1.5%**	**1.5%**	**1,454**	**40,688**	**3.6%**	**3.7%**	**5,723**	**393,169**	**1.5%**	**1.5%**

EXHIBIT VI
RiverSource Life Insurance Company
Prior 2004 Rate Increase Assumptions

Policy Form: 30225-VA

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 Form: 30225-VA

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 Form: 30225-VA

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	0.70	1.00	1.00	1.60	2.00	2.50
2	0.70	1.00	1.00	1.60	2.00	2.50
3	0.70	1.00	1.00	1.60	2.00	2.50
4	0.70	1.00	1.10	1.60	2.00	2.50
5	0.70	1.00	1.10	1.60	2.00	2.25
6	0.70	1.00	1.10	1.60	1.90	2.00
7	0.80	1.00	1.10	1.65	1.90	1.85
8	0.80	1.00	1.10	1.65	1.80	1.85
9	0.80	1.10	1.20	1.65	1.80	1.85
10	0.90	1.10	1.20	1.65	1.80	1.85
11	0.90	1.10	1.30	1.65	1.80	1.85
12	0.90	1.20	1.30	1.65	1.80	1.85
13	1.00	1.20	1.30	1.65	1.80	1.85
14	1.00	1.20	1.30	1.65	1.80	1.85
15	1.00	1.25	1.40	1.65	1.80	1.85
16	1.00	1.25	1.40	1.65	1.80	1.85
17	1.10	1.30	1.40	1.65	1.80	1.85
18	1.10	1.30	1.40	1.65	1.80	1.85
19	1.10	1.35	1.40	1.65	1.80	1.85
20	1.15	1.35	1.40	1.65	1.80	1.85
21	1.15	1.35	1.40	1.65	1.80	1.85
22	1.15	1.35	1.40	1.65	1.80	1.85
23	1.20	1.35	1.40	1.65	1.80	1.85
24	1.20	1.35	1.40	1.65	1.80	1.85
25+	1.20	1.35	1.40	1.65	1.80	1.85

EXHIBIT VI
RiverSource Life Insurance Company
Prior 2004 Rate Increase Assumptions

Policy Form: 30225-VA

Prior 2004 Rate Increase Filing Assumptions (cont):

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	0.50	0.50	0.70	0.80	1.60	1.80	1.85
2	0.50	0.60	0.70	0.80	1.60	1.80	1.85
3	0.50	0.70	0.70	0.80	1.60	1.80	1.85
4	0.60	0.70	0.70	0.90	1.50	1.80	1.90
5	0.60	0.70	0.70	0.90	1.50	1.70	1.90
6	0.60	0.70	0.70	0.90	1.50	1.70	1.90
7	0.70	0.70	0.70	1.00	1.40	1.65	1.95
8	0.70	0.70	0.80	1.00	1.40	1.65	1.95
9	0.70	0.70	0.80	1.00	1.40	1.65	1.95
10	0.70	0.80	0.80	1.10	1.40	1.65	1.95
11	0.70	0.80	0.80	1.10	1.40	1.65	1.95
12	0.80	0.80	0.80	1.10	1.40	1.65	1.95
13	0.80	0.80	0.80	1.10	1.45	1.65	1.95
14	0.80	0.80	0.90	1.20	1.45	1.65	1.95
15	0.80	0.80	0.90	1.20	1.45	1.65	1.95
16	0.80	0.80	0.90	1.20	1.45	1.65	1.95
17	0.80	0.90	1.00	1.30	1.45	1.65	1.95
18	0.80	0.90	1.00	1.30	1.45	1.65	1.95
19	0.80	0.90	1.00	1.30	1.45	1.65	1.95
20	0.80	0.90	1.10	1.30	1.45	1.65	1.95
21	0.80	0.90	1.10	1.30	1.45	1.65	1.95
22	0.90	0.90	1.10	1.30	1.45	1.65	1.95
23	0.90	1.00	1.10	1.30	1.45	1.65	1.95
24	0.90	1.00	1.10	1.30	1.45	1.65	1.95
25	0.90	1.00	1.10	1.30	1.45	1.65	1.95
26	0.90	1.00	1.10	1.30	1.45	1.65	1.95
27+	1.00	1.00	1.10	1.30	1.45	1.65	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: 5.0%

EXHIBIT VII
RiverSource Life Insurance Company
Prior 2007 Rate Increase Assumptions

Policy Form: 30225-VA

Prior 2007 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 2007 Rate Increase Assumptions

Policy Form: 30225-VA

Prior 2007 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 2007 Rate Increase Assumptions

Policy Form: 30225-VA

Prior 2007 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	0.70	0.70	0.90	1.00	1.50	2.00	2.50
2	0.70	0.70	0.90	1.00	1.50	2.00	2.50
3	0.70	0.70	0.90	1.00	1.50	2.00	2.50
4	0.70	0.70	0.90	1.10	1.50	2.00	2.50
5	0.70	0.70	0.90	1.10	1.60	2.00	2.25
6	0.70	0.70	0.90	1.10	1.60	1.90	2.00
7	0.80	0.80	0.90	1.10	1.60	1.90	1.80
8	0.80	0.80	0.90	1.10	1.60	1.80	1.80
9	0.80	0.80	1.00	1.20	1.60	1.80	1.80
10	0.80	0.80	1.00	1.30	1.60	1.80	1.80
11	0.80	0.80	1.00	1.45	1.60	1.80	1.80
12	0.80	0.80	1.10	1.45	1.60	1.80	1.80
13	0.80	0.90	1.20	1.45	1.60	1.80	1.80
14	0.80	1.00	1.20	1.45	1.60	1.80	1.80
15	0.80	1.00	1.25	1.45	1.60	1.80	1.80
16	0.80	1.00	1.25	1.45	1.60	1.80	1.80
17	0.80	1.10	1.30	1.45	1.60	1.80	1.80
18	0.90	1.10	1.30	1.45	1.60	1.80	1.80
19	1.00	1.10	1.35	1.45	1.60	1.80	1.80
20	1.00	1.15	1.35	1.45	1.60	1.80	1.80
21	1.00	1.15	1.35	1.45	1.60	1.80	1.80
22	1.10	1.15	1.35	1.45	1.60	1.80	1.80
23	1.10	1.20	1.35	1.45	1.60	1.80	1.80
24	1.10	1.20	1.35	1.45	1.60	1.80	1.80
25	1.15	1.20	1.35	1.45	1.60	1.80	1.80
26	1.15	1.20	1.35	1.45	1.60	1.80	1.80
27	1.15	1.20	1.35	1.45	1.60	1.80	1.80
28+	1.20	1.20	1.35	1.45	1.60	1.80	1.80

EXHIBIT VII
RiverSource Life Insurance Company
Prior 2007 Rate Increase Assumptions

Policy Form: 30225-VA

Prior 2007 Rate Increase Filing Assumptions (cont):

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	0.50	0.50	0.50	0.70	0.75	1.60	1.80	1.85
2	0.50	0.50	0.60	0.70	0.75	1.60	1.80	1.85
3	0.50	0.50	0.70	0.70	0.75	1.60	1.80	1.85
4	0.50	0.50	0.70	0.70	0.90	1.50	1.80	1.90
5	0.60	0.60	0.70	0.70	0.90	1.50	1.70	1.90
6	0.60	0.60	0.70	0.70	0.90	1.50	1.70	1.90
7	0.60	0.60	0.70	0.70	1.10	1.35	1.50	1.95
8	0.70	0.70	0.70	0.75	1.10	1.35	1.50	1.95
9	0.70	0.70	0.70	0.80	1.10	1.35	1.50	1.95
10	0.70	0.70	0.80	0.90	1.20	1.35	1.50	1.95
11	0.70	0.70	0.80	0.90	1.20	1.35	1.50	1.95
12	0.70	0.70	0.80	0.90	1.20	1.35	1.50	1.95
13	0.70	0.70	0.80	0.90	1.20	1.35	1.50	1.95
14	0.70	0.70	0.80	0.90	1.20	1.35	1.50	1.95
15	0.70	0.80	0.80	0.90	1.20	1.35	1.50	1.95
16	0.70	0.80	0.80	0.90	1.20	1.35	1.50	1.95
17	0.70	0.80	0.90	1.00	1.30	1.35	1.50	1.95
18	0.70	0.80	0.90	1.00	1.30	1.35	1.50	1.95
19	0.70	0.80	0.90	1.00	1.30	1.35	1.50	1.95
20	0.80	0.80	0.90	1.10	1.30	1.35	1.50	1.95
21	0.80	0.80	0.90	1.10	1.30	1.35	1.50	1.95
22	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
23	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
24	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
25	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
26	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
27	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
28	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
29	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
30	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
31+	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.95

An additional 2.5% of inforce policyholders is 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 is also assumed.

Interest Rate: 5.0%

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2009 Rate Increase Assumptions

Policy Forms: 30225-VA

Prior 2009 Rate Increase Filing Assumptions:

Mortality: 1983 Individual Annuitant Mortality Basic Table with selection.

Mortality Selection Factors

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

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2009 Rate Increase Assumptions

Policy Forms: 30225-VA

Prior 2009 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	1.5%	1.7%	1.3%
7	1.3%	1.1%	1.3%
8	0.9%	1.1%	1.3%
9	0.9%	1.1%	1.3%
10	0.8%	1.0%	1.3%
11	0.7%	0.9%	1.4%
12	0.7%	0.9%	1.4%
13	0.7%	0.9%	1.5%
14	0.7%	0.9%	1.5%
15	0.7%	0.9%	1.5%
16	0.8%	0.9%	1.5%
17	0.8%	1.0%	1.5%
18	0.8%	1.1%	1.5%
19	0.8%	1.1%	1.5%
20	0.8%	1.1%	1.5%
21	0.9%	1.3%	1.5%
22	0.9%	1.3%	1.5%
23	0.9%	1.3%	1.5%
24	0.9%	1.3%	1.5%
25	0.9%	1.3%	1.5%
26	0.9%	1.3%	1.5%
27	1.0%	1.3%	1.5%
28	1.0%	1.3%	1.5%
29	1.0%	1.3%	1.5%
30	1.0%	1.3%	1.5%
31	1.1%	1.3%	1.5%
32	1.1%	1.3%	1.5%
33	1.1%	1.3%	1.5%
34	1.1%	1.3%	1.5%
35	1.1%	1.3%	1.5%
36+	1.1%	1.3%	1.5%

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%	2.6%
8	1.2%	1.3%	2.8%
9	1.2%	1.3%	3.0%
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%	4.3%
14	0.8%	1.5%	4.4%
15	0.8%	1.6%	4.6%
16	0.8%	1.8%	4.8%
17	0.8%	2.0%	5.0%
18	0.8%	2.6%	5.0%
19	0.9%	2.8%	5.0%
20	0.9%	3.0%	5.0%
21	0.9%	3.5%	5.0%
22	0.9%	3.7%	5.0%
23	1.0%	3.8%	5.0%
24	1.2%	3.9%	5.0%
25	1.4%	4.0%	5.0%
26	1.5%	4.0%	5.0%
27	1.6%	4.0%	5.0%
28	2.1%	4.0%	5.0%
29	2.4%	4.0%	5.0%
30	2.6%	4.0%	5.0%
31	2.9%	4.0%	5.0%
32	3.1%	4.0%	5.0%
33	3.2%	4.0%	5.0%
34	3.3%	4.0%	5.0%
35	3.4%	4.0%	5.0%
36+	3.5%	4.0%	5.0%

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

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2009 Rate Increase Assumptions

Policy Forms: 30225-VA

Prior 2009 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 2007.

Lifetime Benefit Actual-to-Expected Adjustment Factors

	Issue Age Band						
Duration	<53	53-57	58-62	63-67	68-72	73-77	78+
1	0.40	0.40	1.00	1.00	1.50	2.00	2.50
2	0.40	0.40	1.00	1.00	1.50	2.10	2.50
3	0.40	0.40	1.00	1.00	1.50	2.10	2.50
4	0.40	0.40	1.00	1.25	1.70	2.10	2.50
5	0.40	0.40	1.00	1.25	1.70	2.10	2.25
6	0.40	0.40	0.90	1.25	1.70	1.90	2.25
7	0.40	0.50	0.90	1.25	1.70	1.90	1.80
8	0.40	0.50	0.90	1.25	1.70	1.80	1.80
9	0.40	0.50	0.90	1.25	1.55	1.80	1.80
10	0.40	0.60	0.90	1.35	1.55	1.80	1.80
11	0.40	0.60	0.90	1.45	1.55	1.80	1.80
12	0.50	0.60	1.00	1.45	1.55	1.75	1.80
13	0.50	0.70	1.10	1.45	1.55	1.75	1.80
14	0.50	0.80	1.10	1.45	1.55	1.75	1.80
15	0.60	0.90	1.25	1.45	1.55	1.75	1.80
16	0.60	0.90	1.25	1.45	1.55	1.75	1.80
17	0.60	1.00	1.30	1.45	1.55	1.75	1.80
18	0.60	1.10	1.30	1.45	1.55	1.75	1.80
19	0.70	1.10	1.35	1.45	1.55	1.75	1.80
20	0.80	1.15	1.35	1.45	1.55	1.75	1.80
21	0.80	1.15	1.35	1.45	1.55	1.75	1.80
22	0.80	1.15	1.35	1.45	1.55	1.75	1.80
23	1.00	1.20	1.35	1.45	1.55	1.75	1.80
24	1.10	1.20	1.35	1.45	1.55	1.75	1.80
25	1.10	1.20	1.35	1.45	1.55	1.75	1.80
26	1.15	1.20	1.35	1.45	1.55	1.75	1.80
27	1.15	1.20	1.35	1.45	1.55	1.75	1.80
28	1.15	1.20	1.35	1.45	1.55	1.75	1.80
29+	1.20	1.20	1.35	1.45	1.55	1.75	1.80

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2009 Rate Increase Assumptions

Policy Forms: 30225-VA

Prior 2009 Rate Increase Filing Assumptions (cont):

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	0.30	0.30	0.50	0.70	0.70	1.60	1.80	1.85
2	0.30	0.30	0.50	0.70	0.70	1.60	1.80	1.85
3	0.30	0.30	0.70	0.75	0.75	1.50	1.80	1.85
4	0.30	0.30	0.70	0.75	0.75	1.50	1.80	1.90
5	0.40	0.40	0.70	0.75	0.75	1.50	1.80	1.90
6	0.40	0.40	0.70	0.75	0.75	1.50	1.80	1.90
7	0.40	0.40	0.70	0.75	1.10	1.35	1.50	1.95
8	0.40	0.40	0.70	0.75	1.10	1.35	1.50	1.95
9	0.40	0.40	0.70	0.80	1.10	1.35	1.50	1.95
10	0.40	0.40	0.70	1.00	1.20	1.35	1.50	1.95
11	0.40	0.40	0.70	1.00	1.20	1.35	1.50	1.95
12	0.40	0.40	0.70	1.10	1.20	1.35	1.50	1.95
13	0.40	0.50	0.70	1.10	1.20	1.35	1.50	1.95
14	0.40	0.50	0.80	1.10	1.20	1.35	1.50	1.95
15	0.40	0.55	0.80	1.10	1.20	1.35	1.50	1.95
16	0.40	0.60	0.80	1.10	1.20	1.35	1.50	1.95
17	0.40	0.65	0.90	1.10	1.30	1.35	1.50	1.95
18	0.50	0.70	0.90	1.10	1.30	1.35	1.50	1.95
19	0.50	0.80	0.90	1.10	1.30	1.35	1.50	1.95
20	0.55	0.80	0.90	1.10	1.30	1.35	1.50	1.95
21	0.60	0.80	1.00	1.10	1.30	1.35	1.50	1.95
22	0.65	0.90	1.00	1.10	1.30	1.35	1.50	1.95
23	0.70	0.90	1.00	1.10	1.30	1.35	1.50	1.95
24	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
25	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
26	0.80	1.00	1.00	1.10	1.30	1.35	1.50	1.95
27	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
28	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
29	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
30	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
31+	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.95

The following adverse selection factors are used, which includes some anti-selection from prior increases:

Calendar Year	Without Current Requested Increase	With Current Requested Increase
2008	4.0%	4.0%
2009	3.0%	4.0%
2010	2.0%	4.0%
2011	1.5%	3.0%
2012	1.0%	2.0%
2013	1.0%	1.0%
2014+	0.0%	0.0%

Interest Rate: 5.0%

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Forms: 30225-VA

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 Forms: 30225-VA

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 Forms: 30225-VA

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	0.40	0.40	0.40	1.00	1.00	1.00	1.00	2.50
2	0.32	0.40	0.40	1.00	1.00	1.00	2.40	2.50
3	0.27	0.40	0.40	1.60	1.60	1.50	2.40	2.40
4	0.23	0.40	0.40	1.60	1.60	2.00	2.15	2.40
5	0.20	0.40	0.50	1.60	1.10	2.00	2.15	2.40
6	0.18	0.40	0.50	1.00	1.10	2.00	2.00	2.40
7	0.20	0.40	0.50	1.00	1.10	2.00	2.00	1.90
8	0.24	0.40	0.50	1.00	1.40	2.00	1.70	1.90
9	0.28	0.40	0.50	1.00	1.40	1.75	1.70	1.90
10	0.32	0.40	0.60	0.85	1.40	1.60	1.70	1.90
11	0.36	0.40	0.60	0.75	1.45	1.60	1.80	1.90
12	0.40	0.50	0.60	0.80	1.50	1.60	1.65	1.90
13	0.40	0.50	0.60	0.95	1.50	1.60	1.65	1.90
14	0.40	0.50	0.65	0.95	1.50	1.60	1.65	1.90
15	0.40	0.60	0.70	1.05	1.50	1.60	1.65	1.90
16	0.40	0.60	0.80	1.10	1.50	1.60	1.65	1.90
17	0.50	0.60	0.80	1.15	1.50	1.60	1.65	1.90
18	0.50	0.60	0.90	1.15	1.50	1.60	1.65	1.90
19	0.50	0.65	0.95	1.20	1.50	1.60	1.65	1.90
20	0.60	0.70	0.95	1.25	1.50	1.60	1.65	1.90
21	0.60	0.80	1.00	1.25	1.50	1.60	1.65	1.90
22	0.60	0.80	1.00	1.30	1.50	1.60	1.65	1.90
23	0.60	0.90	1.05	1.30	1.50	1.60	1.65	1.90
24	0.65	0.95	1.05	1.30	1.50	1.60	1.65	1.90
25	0.70	0.95	1.10	1.30	1.50	1.60	1.65	1.90
26	0.80	1.00	1.10	1.30	1.50	1.60	1.65	1.90
27	0.80	1.00	1.15	1.30	1.50	1.60	1.65	1.90
28	0.90	1.05	1.15	1.30	1.50	1.60	1.65	1.90
29	0.95	1.05	1.15	1.30	1.50	1.60	1.65	1.90
30	0.95	1.10	1.15	1.30	1.50	1.60	1.65	1.90
31	1.00	1.10	1.15	1.30	1.50	1.60	1.65	1.90
32	1.00	1.10	1.15	1.30	1.50	1.60	1.65	1.90
33	1.05	1.10	1.15	1.30	1.50	1.60	1.65	1.90
34	1.05	1.10	1.15	1.30	1.50	1.60	1.65	1.90
35+	1.10	1.10	1.15	1.30	1.50	1.60	1.65	1.90

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Forms: 30225-VA

Prior 2011 Rate Increase Filing Assumptions (cont):

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	0.30	0.30	0.30	0.40	0.50	0.50	1.60	1.00	2.00
2	0.24	0.30	0.30	0.40	0.50	0.50	1.60	1.00	2.00
3	0.20	0.30	0.30	0.55	0.75	0.80	1.50	1.90	2.00
4	0.17	0.30	0.30	0.55	0.75	0.80	1.50	1.90	2.00
5	0.15	0.35	0.35	0.55	0.75	0.80	1.50	1.90	2.00
6	0.13	0.35	0.35	0.55	0.75	0.80	1.50	1.90	2.00
7	0.15	0.35	0.35	0.55	0.75	1.05	1.35	1.50	2.00
8	0.18	0.35	0.35	0.55	0.75	1.05	1.35	1.50	1.50
9	0.21	0.35	0.35	0.55	0.75	1.05	1.35	1.50	1.50
10	0.28	0.35	0.35	0.70	1.00	1.05	1.35	1.50	1.50
11	0.32	0.40	0.40	0.70	1.00	1.15	1.35	1.50	1.75
12	0.35	0.40	0.40	0.70	1.05	1.20	1.35	1.50	1.75
13	0.35	0.40	0.50	0.70	1.05	1.20	1.35	1.50	1.75
14	0.35	0.40	0.50	0.90	1.05	1.20	1.35	1.50	1.75
15	0.35	0.40	0.55	0.90	1.05	1.30	1.35	1.50	1.75
16	0.40	0.40	0.60	0.90	1.05	1.30	1.35	1.50	1.75
17	0.40	0.40	0.65	0.90	1.05	1.30	1.35	1.50	1.75
18	0.40	0.50	0.70	0.90	1.05	1.30	1.35	1.50	1.75
19	0.40	0.50	0.75	0.90	1.10	1.30	1.35	1.50	1.75
20	0.40	0.55	0.75	0.90	1.10	1.30	1.35	1.50	1.75
21	0.40	0.60	0.75	1.00	1.10	1.30	1.35	1.50	1.75
22	0.40	0.65	0.85	1.00	1.10	1.30	1.35	1.50	1.75
23	0.50	0.70	0.85	1.00	1.10	1.30	1.35	1.50	1.75
24	0.50	0.75	0.85	1.00	1.10	1.30	1.35	1.50	1.75
25	0.55	0.75	0.90	1.00	1.10	1.30	1.35	1.50	1.75
26	0.60	0.80	0.95	1.00	1.10	1.30	1.35	1.50	1.75
27	0.65	0.85	0.95	1.00	1.10	1.30	1.35	1.50	1.75
28	0.70	0.85	1.00	1.00	1.10	1.30	1.35	1.50	1.75
29	0.75	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.75
30	0.75	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.75
31	0.80	0.95	1.00	1.00	1.10	1.30	1.35	1.50	1.75
32	0.85	0.95	1.00	1.00	1.10	1.30	1.35	1.50	1.75
33	0.85	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
34	0.90	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
35	0.90	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
36	0.95	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
37	0.95	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
38+	1.00	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75

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: 5.0%

EXHIBIT X
RiverSource Life Insurance Company
Nationwide Experience Projections with No Increase
Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis
Policy Form: 30225

			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
	1992	8	145	0	0	0.0%	0.0%	409	0	0	0.0%	0.0%	5.00%	2.8202
	1993	8,609	2,687,161	13,547	147,465	0.5%	5.5%	7,217,338	36,384	396,071	0.5%	5.5%	5.00%	2.6859
	1994	22,300	12,916,809	161,852	1,546,420	1.3%	12.0%	33,040,700	414,010	3,955,682	1.3%	12.0%	5.00%	2.5580
	1995	39,388	26,751,336	524,580	3,369,053	2.0%	12.6%	65,170,369	1,277,959	8,207,531	2.0%	12.6%	5.00%	2.4362
	1996	61,189	42,758,453	1,649,792	6,593,399	3.9%	15.4%	99,205,876	3,827,760	15,297,652	3.9%	15.4%	5.00%	2.3201
	1997	74,032	58,783,795	3,090,519	7,424,220	5.3%	12.6%	129,892,397	6,829,006	16,405,027	5.3%	12.6%	5.00%	2.2097
	1998	77,314	67,697,736	4,844,252	13,305,497	7.2%	19.7%	142,465,910	10,194,443	28,000,638	7.2%	19.7%	5.00%	2.1044
Historical	1999	74,116	66,592,712	7,367,115	18,669,759	11.1%	28.0%	133,467,097	14,765,391	37,418,487	11.1%	28.0%	5.00%	2.0042
Experience	2000	71,332	63,713,697	10,763,930	19,274,006	16.9%	30.3%	121,616,084	20,546,085	36,790,035	16.9%	30.3%	5.00%	1.9088
	2001	69,192	61,140,894	14,405,241	23,482,824	23.6%	38.4%	111,147,755	26,187,223	42,689,320	23.6%	38.4%	5.00%	1.8179
	2002	67,285	58,984,823	18,680,647	31,882,410	31.7%	54.1%	102,122,138	32,342,347	55,198,942	31.7%	54.1%	5.00%	1.7313
	2003	65,504	56,853,917	23,278,895	35,876,618	40.9%	63.1%	93,745,559	38,384,216	59,156,411	40.9%	63.1%	5.00%	1.6489
	2004	63,859	55,057,979	27,534,536	33,373,239	50.0%	60.6%	86,461,205	43,239,312	52,408,215	50.0%	60.6%	5.00%	1.5704
	2005	61,372	50,157,191	31,341,086	29,998,753	62.5%	59.8%	75,014,448	46,873,324	44,865,749	62.5%	59.8%	5.00%	1.4956
	2006	59,452	52,775,548	33,562,912	39,771,059	63.6%	75.4%	75,171,838	47,805,961	56,648,651	63.6%	75.4%	5.00%	1.4244
	2007	57,749	60,977,339	37,427,898	44,353,590	61.4%	72.7%	82,718,298	50,772,501	60,167,491	61.4%	72.7%	5.00%	1.3565
	2008	55,636	59,305,602	42,350,250	46,598,165	71.4%	78.6%	76,619,540	54,714,167	60,202,237	71.4%	78.6%	5.00%	1.2919
	2009	53,387	63,016,024	47,512,751	52,752,330	75.4%	83.7%	77,536,379	58,460,793	64,907,692	75.4%	83.7%	5.00%	1.2304
	2010	51,455	67,630,762	52,103,000	49,544,460	77.0%	73.3%	79,251,867	61,055,944	58,057,766	77.0%	73.3%	5.00%	1.1718
	2011	49,498	65,407,470	55,618,997	66,353,503	85.0%	101.4%	72,996,707	62,072,477	74,052,509	85.0%	101.4%	5.00%	1.1160
	2012	47,526	62,193,076	63,058,486	67,431,878	101.4%	108.4%	66,104,140	67,023,973	71,672,389	101.4%	108.4%	5.00%	1.0629
	1/2013-9/2013	46,237	48,200,249	50,781,323	56,489,129	105.4%	117.2%	49,090,252	51,718,986	57,532,184	105.4%	117.2%	5.00%	1.0185
	10/2013-12/2013	45,551	16,542,560	19,923,980	19,587,615	120.4%	118.4%	16,441,978	19,802,838	19,468,518	120.4%	118.4%	5.00%	0.9939
	2014	43,531	63,736,937	65,741,683	81,620,569	103.1%	128.1%	61,446,792	63,379,505	78,687,844	103.1%	128.1%	5.00%	0.9641
	2015	41,471	59,833,032	72,356,220	86,971,390	120.9%	145.4%	54,936,342	66,434,642	79,853,718	120.9%	145.4%	5.00%	0.9182
	2016	39,372	55,965,249	83,613,661	93,017,872	149.4%	166.2%	48,938,186	73,115,030	81,338,438	149.4%	166.2%	5.00%	0.8744
	2017	37,236	52,143,126	93,516,911	99,381,830	179.3%	190.6%	43,424,737	77,880,778	82,765,076	179.3%	190.6%	5.00%	0.8328
	2018	35,066	48,373,764	100,746,191	105,693,175	208.3%	218.5%	38,367,253	79,906,013	83,829,673	208.3%	218.5%	5.00%	0.7931
Projected	2019	32,874	44,672,323	107,144,249	111,996,443	239.8%	250.7%	33,744,273	80,933,886	84,599,104	239.8%	250.7%	5.00%	0.7554
Future	2020	30,670	41,056,122	113,850,322	118,232,043	277.3%	288.0%	29,535,897	81,904,260	85,056,484	277.3%	288.0%	5.00%	0.7194
Experience	2021	28,468	37,541,204	120,651,331	124,256,135	321.4%	331.0%	25,721,194	82,663,740	85,133,556	321.4%	331.0%	5.00%	0.6851
	2022	26,284	34,149,017	127,313,089	130,031,603	372.8%	380.8%	22,282,906	83,074,300	84,848,183	372.8%	380.8%	5.00%	0.6525
	2023	24,133	30,899,000	133,756,104	135,781,218	432.9%	439.4%	19,202,101	83,122,375	84,380,877	432.9%	439.4%	5.00%	0.6214
	2024	22,026	27,803,405	139,973,930	141,405,560	503.4%	508.6%	16,455,574	82,844,216	83,691,533	503.4%	508.6%	5.00%	0.5919
	2025	19,976	24,870,789	145,938,450	146,500,077	586.8%	589.0%	14,018,944	82,261,280	82,577,853	586.8%	589.0%	5.00%	0.5637
	2026	18,000	22,112,024	151,632,991	150,869,986	685.7%	682.3%	11,870,389	81,401,075	80,991,471	685.7%	682.3%	5.00%	0.5368
	2027	16,113	19,537,901	157,128,894	153,887,047	804.2%	787.6%	9,989,070	80,334,703	78,677,256	804.2%	787.6%	5.00%	0.5113
	2028	14,321	17,152,529	161,856,951	154,557,764	943.6%	901.1%	8,351,914	78,811,427	75,257,306	943.6%	901.1%	5.00%	0.4869
	2029	12,638	14,958,233	165,232,086	153,056,223	1104.6%	1023.2%	6,936,635	76,623,666	70,977,309	1104.6%	1023.2%	5.00%	0.4637
	2030	11,071	12,957,221	167,029,785	150,021,325	1289.1%	1157.8%	5,722,570	73,768,875	66,257,071	1289.1%	1157.8%	5.00%	0.4417
	2031	9,623	11,145,521	167,232,093	145,741,393	1500.4%	1307.6%	4,688,029	70,341,166	61,301,748	1500.4%	1307.6%	5.00%	0.4206
	2032	8,298	9,516,626	165,879,295	140,229,509	1743.0%	1473.5%	3,812,270	66,449,669	56,174,609	1743.0%	1473.5%	5.00%	0.4006
	2033	7,100	8,066,640	163,022,693	133,560,110	2020.9%	1655.7%	3,077,542	62,195,563	50,955,153	2020.9%	1655.7%	5.00%	0.3815
	2034	6,030	6,789,168	158,721,962	125,799,436	2337.9%	1852.9%	2,466,827	57,671,210	45,708,897	2337.9%	1852.9%	5.00%	0.3633
	2035	5,080	5,673,038	153,052,105	117,127,605	2697.9%	2064.6%	1,963,127	52,962,936	40,531,437	2697.9%	2064.6%	5.00%	0.3460
	2036	4,245	4,705,434	146,124,913	107,719,264	3105.5%	2289.3%	1,550,755	48,157,919	35,500,693	3105.5%	2289.3%	5.00%	0.3296
	2037	3,518	3,873,252	138,080,514	97,804,641	3565.0%	2525.1%	1,215,710	43,339,764	30,698,249	3565.0%	2525.1%	5.00%	0.3139
	2038	2,891	3,163,404	129,110,955	87,724,740	4081.4%	2773.1%	945,626	38,594,724	26,223,276	4081.4%	2773.1%	5.00%	0.2989
	2039	2,354	2,563,020	119,450,861	77,745,166	4660.6%	3033.3%	729,672	34,006,727	22,133,441	4660.6%	3033.3%	5.00%	0.2847
	2040	1,900	2,059,622	109,352,862	68,107,017	5309.4%	3306.8%	558,437	29,649,434	18,466,225	5309.4%	3306.8%	5.00%	0.2711
	2041	1,520	1,641,280	99,067,478	59,009,504	6036.0%	3595.3%	423,818	25,581,621	15,237,682	6036.0%	3595.3%	5.00%	0.2582
	2042	1,204	1,296,749	88,834,681	50,619,947	6850.6%	3903.6%	318,907	21,846,919	12,448,853	6850.6%	3903.6%	5.00%	0.2459
	2043	945	1,015,587	78,871,084	43,025,102	7766.1%	4236.5%	237,868	18,472,946	10,077,209	7766.1%	4236.5%	5.00%	0.2342
	2044	735	788,256	69,354,317	36,231,175	8798.5%	4596.4%	175,831	15,470,436	8,081,863	8798.5%	4596.4%	5.00%	0.2231
	2045	565	606,168	60,415,508	30,209,050	9966.8%	4983.6%	128,775	12,834,773	6,417,662	9966.8%	4983.6%	5.00%	0.2124
	2046	430	461,704	52,139,533	24,911,670	11292.8%	5395.6%	93,414	10,549,153	5,040,264	11292.8%	5395.6%	5.00%	0.2023
	2047	324	348,200	44,572,807	20,288,249	12800.9%	5826.6%	67,095	8,588,773	3,909,361	12800.9%	5826.6%	5.00%	0.1927
	2048	241	259,907	37,732,884	16,295,083	14517.8%	6269.6%	47,697	6,924,555	2,990,394	14517.8%	6269.6%	5.00%	0.1835
	2049	178	191,931	31,618,088	12,893,977	16473.7%	6718.0%	33,545	5,526,093	2,253,562	16473.7%	6718.0%	5.00%	0.1748
	2050	129	140,155	26,213,821	10,047,797	18703.4%	7169.1%	23,329	4,363,386	1,672,492	18703.4%	7169.1%	5.00%	0.1665
	2051	93	101,157	21,494,450	7,709,181	21248.6%	7621.0%	16,036	3,407,456	1,222,115	21248.6%	7621.0%	5.00%	0.1585
	2052	66	72,123	17,426,624	5,833,777	24162.5%	8088.7%	10,889	2,631,043	880,774	24162.5%	8088.7%	5.00%	0.1510
	Past		1,103,602,716	526,071,609	648,237,776	47.7%	58.7%	1,780,056,306	698,542,262	904,030,678	39.2%	50.8%		
	Future		688,783,378	4,205,176,353	3,575,501,269	610.5%	519.1%	489,971,952	1,987,828,876	1,846,317,226	405.7%	376.8%		
	Lifetime		1,792,386,094	4,731,247,962	4,223,739,045	264.0%	235.6%	2,270,028,259	2,686,371,138	2,750,347,905	118.3%	121.2%		

EXHIBIT X
RiverSource Life Insurance Company
Nationwide Experience Projections with 15% Increase
Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis
Policy Form: 30225

			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
	1992	8	145	0	0	0.0%	0.0%	409	0	0	0.0%	0.0%	5.00%	2.8202
	1993	8,609	2,687,161	13,547	147,465	0.5%	5.5%	7,217,338	36,384	396,071	0.5%	5.5%	5.00%	2.6859
	1994	22,300	12,916,809	161,852	1,546,420	1.3%	12.0%	33,040,700	414,010	3,955,682	1.3%	12.0%	5.00%	2.5580
	1995	39,388	26,751,336	524,580	3,369,053	2.0%	12.6%	65,170,369	1,277,959	8,207,531	2.0%	12.6%	5.00%	2.4362
	1996	61,189	42,758,453	1,649,792	6,593,399	3.9%	15.4%	99,205,876	3,827,760	15,297,652	3.9%	15.4%	5.00%	2.3201
	1997	74,032	58,783,795	3,090,519	7,424,220	5.3%	12.6%	129,892,397	6,829,006	16,405,027	5.3%	12.6%	5.00%	2.2097
	1998	77,314	67,697,736	4,844,252	13,305,497	7.2%	19.7%	142,465,910	10,194,443	28,000,638	7.2%	19.7%	5.00%	2.1044
Historical	1999	74,116	66,592,712	7,367,115	18,669,759	11.1%	28.0%	133,467,097	14,765,391	37,418,487	11.1%	28.0%	5.00%	2.0042
Experience	2000	71,332	63,713,697	10,763,930	19,274,006	16.9%	30.3%	121,616,084	20,546,085	36,790,035	16.9%	30.3%	5.00%	1.9088
	2001	69,192	61,140,894	14,405,241	23,482,824	23.6%	38.4%	111,147,755	26,187,223	42,689,320	23.6%	38.4%	5.00%	1.8179
	2002	67,285	58,984,823	18,680,647	31,882,410	31.7%	54.1%	102,122,138	32,342,347	55,198,942	31.7%	54.1%	5.00%	1.7313
	2003	65,504	56,853,917	23,278,895	35,876,618	40.9%	63.1%	93,745,559	38,384,216	59,156,411	40.9%	63.1%	5.00%	1.6489
	2004	63,859	55,057,979	27,534,536	33,373,239	50.0%	60.6%	86,461,205	43,239,312	52,408,215	50.0%	60.6%	5.00%	1.5704
	2005	61,372	50,157,191	31,341,086	29,998,753	62.5%	59.8%	75,014,448	46,873,324	44,865,749	62.5%	59.8%	5.00%	1.4956
	2006	59,452	52,775,548	33,562,912	39,771,059	63.6%	75.4%	75,171,838	47,805,961	56,648,651	63.6%	75.4%	5.00%	1.4244
	2007	57,749	60,977,339	37,427,898	44,353,590	61.4%	72.7%	82,718,298	50,772,501	60,167,491	61.4%	72.7%	5.00%	1.3565
	2008	55,636	59,305,602	42,350,250	46,598,165	71.4%	78.6%	76,619,540	54,714,167	60,202,237	71.4%	78.6%	5.00%	1.2919
	2009	53,387	63,016,024	47,512,751	52,752,330	75.4%	83.7%	77,536,379	58,460,793	64,907,692	75.4%	83.7%	5.00%	1.2304
	2010	51,455	67,630,762	52,103,000	49,544,460	77.0%	73.3%	79,251,867	61,055,944	58,057,766	77.0%	73.3%	5.00%	1.1718
	2011	49,498	65,407,470	55,618,997	66,353,503	85.0%	101.4%	72,996,707	62,072,477	74,052,509	85.0%	101.4%	5.00%	1.1160
	2012	47,526	62,193,076	63,058,486	67,431,878	101.4%	108.4%	66,104,140	67,023,973	71,672,389	101.4%	108.4%	5.00%	1.0629
	1/2013-9/2013	46,237	48,200,249	50,781,323	56,489,129	105.4%	117.2%	49,090,252	51,718,986	57,532,184	105.4%	117.2%	5.00%	1.0185
	10/2013-12/2013	45,551	16,542,560	19,923,980	19,587,615	120.4%	118.4%	16,441,978	19,802,838	19,468,518	120.4%	118.4%	5.00%	0.9939
	2014	43,171	64,915,114	65,737,003	81,563,789	101.3%	125.6%	62,582,636	63,374,993	78,633,104	101.3%	125.6%	5.00%	0.9641
	2015	40,929	66,712,682	72,363,554	87,202,826	108.5%	130.7%	61,252,966	66,441,375	80,066,213	108.5%	130.7%	5.00%	0.9182
	2016	38,858	63,074,856	83,630,296	92,532,076	132.6%	146.7%	55,155,102	73,129,577	80,913,639	132.6%	146.7%	5.00%	0.8744
	2017	36,749	58,767,348	93,258,649	97,953,656	158.7%	166.7%	48,941,381	77,665,698	81,575,694	158.7%	166.7%	5.00%	0.8328
	2018	34,608	54,519,281	100,053,520	104,004,108	183.5%	190.8%	43,241,520	79,356,627	82,490,004	183.5%	190.8%	5.00%	0.7931
Projected	2019	32,445	50,347,739	106,060,178	110,168,993	210.7%	218.8%	38,031,329	80,115,008	83,218,696	210.7%	218.8%	5.00%	0.7554
Future	2020	30,270	46,272,239	112,436,936	116,265,813	243.0%	251.3%	33,288,387	80,887,467	83,641,972	243.0%	251.3%	5.00%	0.7194
Experience	2021	28,096	42,310,863	118,977,156	122,153,707	281.2%	288.7%	28,989,106	81,516,686	83,693,086	281.2%	288.7%	5.00%	0.6851
	2022	25,941	38,487,785	125,419,995	127,796,549	325.9%	332.0%	25,114,038	81,839,019	83,389,767	325.9%	332.0%	5.00%	0.6525
	2023	23,818	34,824,918	131,662,005	133,413,520	378.1%	383.1%	21,641,852	81,821,003	82,909,477	378.1%	383.1%	5.00%	0.6214
	2024	21,738	31,336,072	137,691,456	138,907,414	439.4%	443.3%	18,546,399	81,493,323	82,212,994	439.4%	443.3%	5.00%	0.5919
	2025	19,715	28,030,893	143,479,919	143,881,483	511.9%	513.3%	15,800,203	80,875,477	81,101,828	511.9%	513.3%	5.00%	0.5637
	2026	17,765	24,921,639	149,012,248	148,144,978	597.9%	594.4%	13,378,673	79,994,183	79,528,606	597.9%	594.4%	5.00%	0.5368
	2027	15,902	22,020,472	154,362,556	151,081,846	701.0%	686.1%	11,258,325	78,920,367	77,243,051	701.0%	686.1%	5.00%	0.5113
	2028	14,134	19,332,029	158,968,211	151,717,655	822.3%	784.8%	9,413,157	77,404,841	73,874,399	822.3%	784.8%	5.00%	0.4869
	2029	12,473	16,858,933	162,251,907	150,223,605	962.4%	891.1%	7,818,053	75,241,657	69,663,729	962.4%	891.1%	5.00%	0.4637
	2030	10,926	14,603,672	163,990,968	147,226,998	1122.9%	1008.2%	6,449,727	72,426,779	65,022,954	1122.9%	1008.2%	5.00%	0.4417
	2031	9,497	12,561,773	164,166,221	143,010,998	1306.9%	1138.5%	5,283,733	69,051,599	60,153,289	1306.9%	1138.5%	5.00%	0.4206
	2032	8,189	10,725,902	162,817,247	137,588,586	1518.0%	1282.8%	4,296,695	65,223,042	55,116,680	1518.0%	1282.8%	5.00%	0.4006
	2033	7,008	9,091,671	159,994,683	131,032,928	1759.8%	1441.2%	3,468,607	61,040,333	49,990,996	1759.8%	1441.2%	5.00%	0.3815
	2034	5,951	7,651,872	155,757,305	123,409,043	2035.5%	1612.8%	2,780,288	56,594,010	44,840,354	2035.5%	1612.8%	5.00%	0.3633
	2035	5,014	6,393,916	150,178,887	114,893,563	2348.8%	1796.9%	2,212,583	51,968,673	39,758,358	2348.8%	1796.9%	5.00%	0.3460
	2036	4,190	5,303,358	143,369,214	105,657,695	2703.4%	1992.3%	1,747,811	47,249,732	34,821,268	2703.4%	1992.3%	5.00%	0.3296
	2037	3,472	4,365,429	135,465,805	95,927,107	3103.1%	2197.4%	1,370,191	42,519,077	30,108,942	3103.1%	2197.4%	5.00%	0.3139
	2038	2,853	3,565,380	126,657,012	86,036,066	3552.4%	2413.1%	1,065,788	37,861,175	25,718,486	3552.4%	2413.1%	5.00%	0.2989
	2039	2,323	2,888,705	117,172,887	76,244,850	4056.2%	2639.4%	822,392	33,358,205	21,706,313	4056.2%	2639.4%	5.00%	0.2847
	2040	1,875	2,321,339	107,261,091	66,789,697	4620.7%	2877.2%	629,397	29,082,281	18,109,052	4620.7%	2877.2%	5.00%	0.2711
	2041	1,500	1,849,838	97,167,183	57,865,762	5252.7%	3128.2%	477,673	25,090,919	14,942,341	5252.7%	3128.2%	5.00%	0.2582
	2042	1,189	1,461,527	87,126,339	49,636,929	5961.3%	3396.2%	359,430	21,426,790	12,207,101	5961.3%	3396.2%	5.00%	0.2459
	2043	933	1,144,638	77,350,809	42,188,093	6757.7%	3685.7%	268,094	18,116,872	9,881,167	6757.7%	3685.7%	5.00%	0.2342
	2044	725	888,419	68,014,611	35,525,184	7655.7%	3998.7%	198,174	15,171,596	7,924,382	7655.7%	3998.7%	5.00%	0.2231
	2045	558	683,193	59,246,157	29,619,523	8671.9%	4335.5%	145,139	12,586,354	6,292,422	8671.9%	4335.5%	5.00%	0.2124
	2046	425	520,372	51,128,514	24,424,851	9825.4%	4693.7%	105,285	10,344,598	4,941,768	9825.4%	4693.7%	5.00%	0.2023
	2047	320	392,445	43,707,047	19,891,280	11137.1%	5068.5%	75,621	8,421,949	3,832,868	11137.1%	5068.5%	5.00%	0.1927
	2048	238	292,933	36,998,832	15,975,877	12630.5%	5453.8%	53,758	6,789,845	2,931,815	12630.5%	5453.8%	5.00%	0.1835
	2049	175	216,319	31,002,105	12,641,127	14331.6%	5843.7%	37,807	5,418,433	2,209,369	14331.6%	5843.7%	5.00%	0.1748
	2050	128	157,964	25,702,445	9,850,568	16271.0%	6235.9%	26,294	4,278,265	1,639,663	16271.0%	6235.9%	5.00%	0.1665
	2051	92	114,011	21,074,625	7,557,720	18484.7%	6628.9%	18,074	3,340,903	1,198,105	18484.7%	6628.9%	5.00%	0.1585
	2052	65	81,287	17,085,866	5,719,065	21019.1%	7035.6%	12,273	2,579,596	863,455	21019.1%	7035.6%	5.00%	0.1510
	Past		1,103,602,716	526,071,609	648,237,776	47.7%	58.7%	1,780,056,306	698,542,262	904,030,678	39.2%	50.8%		
	Future		766,551,388	4,137,725,423	3,515,313,141	539.8%	458.6%	542,799,935	1,959,821,167	1,817,835,923	361.1%	334.9%		
	Lifetime		1,870,154,104	4,663,797,031	4,163,550,917	249.4%	222.6%	2,322,856,241	2,658,363,429	2,721,866,602	114.4%	117.2%		

EXHIBIT XI
RiverSource Life Insurance Company
Virginia Experience Projections with No Increase
Policy Form: 30225-VA

			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
	1992	0	0	0	0	0.0%	0.0%	0	0	0	0.0%	0.0%	5.00%	2.8202
	1993	292	98,888	0	0	0.0%	0.0%	265,599	0	0	0.0%	0.0%	5.00%	2.6859
	1994	748	418,230	6,490	387,631	1.6%	92.7%	1,069,817	16,602	991,546	1.6%	92.7%	5.00%	2.5580
	1995	1,435	902,340	21,320	213	2.4%	0.0%	2,198,239	51,940	518	2.4%	0.0%	5.00%	2.4362
	1996	2,393	1,529,333	36,792	155,443	2.4%	10.2%	3,548,276	85,363	360,651	2.4%	10.2%	5.00%	2.3201
	1997	2,963	2,145,118	114,365	826,897	5.3%	38.5%	4,739,989	252,709	1,827,165	5.3%	38.5%	5.00%	2.2097
	1998	3,018	2,525,593	96,075	1,429,632	3.8%	56.6%	5,314,962	202,185	3,008,576	3.8%	56.6%	5.00%	2.1044
Historical	1999	2,846	2,386,879	168,375	679,862	7.1%	28.5%	4,783,855	337,461	1,362,600	7.1%	28.5%	5.00%	2.0042
Experience	2000	2,760	2,297,144	311,758	21,598	13.6%	0.9%	4,384,767	595,081	41,227	13.6%	0.9%	5.00%	1.9088
	2001	2,695	2,227,711	442,777	805,162	19.9%	36.1%	4,049,745	804,922	1,463,700	19.9%	36.1%	5.00%	1.8179
	2002	2,643	2,167,337	547,360	1,571,307	25.3%	72.5%	3,752,373	947,661	2,720,450	25.3%	72.5%	5.00%	1.7313
	2003	2,569	2,102,370	761,208	1,381,359	36.2%	65.7%	3,466,566	1,255,145	2,277,702	36.2%	65.7%	5.00%	1.6489
	2004	2,511	2,035,594	1,021,139	1,529,432	50.2%	75.1%	3,196,629	1,603,563	2,401,768	50.2%	75.1%	5.00%	1.5704
	2005	2,466	1,964,083	995,965	716,605	50.7%	36.5%	2,937,457	1,489,553	1,071,746	50.7%	36.5%	5.00%	1.4956
	2006	2,378	2,068,834	1,250,293	1,314,435	60.4%	63.5%	2,946,782	1,780,878	1,872,240	60.4%	63.5%	5.00%	1.4244
	2007	2,300	2,293,050	1,337,956	965,508	58.3%	42.1%	3,110,617	1,814,993	1,309,752	58.3%	42.1%	5.00%	1.3565
	2008	2,234	2,228,600	1,542,727	1,247,936	69.2%	56.0%	2,879,227	1,993,117	1,612,264	69.2%	56.0%	5.00%	1.2919
	2009	2,165	2,362,148	1,389,060	2,092,374	58.8%	88.6%	2,906,442	1,709,132	2,574,506	58.8%	88.6%	5.00%	1.2304
	2010	2,099	2,564,764	1,650,590	1,007,494	64.4%	39.3%	3,005,471	1,934,213	1,180,614	64.4%	39.3%	5.00%	1.1718
	2011	2,052	2,515,138	1,971,187	1,974,607	78.4%	78.5%	2,806,970	2,199,904	2,203,721	78.4%	78.5%	5.00%	1.1160
	2012	1,998	2,450,850	2,063,176	894,884	84.2%	36.5%	2,604,974	2,192,920	951,160	84.2%	36.5%	5.00%	1.0629
	1/2013-9/2013	1,944	1,915,182	1,612,223	1,094,472	84.2%	57.1%	1,950,545	1,641,992	1,114,681	84.2%	57.1%	5.00%	1.0185
	10/2013-12/2013	1,926	652,989	870,083	698,670	133.2%	107.0%	649,018	864,793	694,422	133.2%	107.0%	5.00%	0.9939
	2014	1,855	2,533,548	2,476,860	2,935,049	97.8%	115.8%	2,442,515	2,387,863	2,829,589	97.8%	115.8%	5.00%	0.9641
	2015	1,781	2,405,575	2,633,089	3,173,963	109.5%	131.9%	2,208,705	2,417,599	2,914,208	109.5%	131.9%	5.00%	0.9182
	2016	1,705	2,275,968	2,988,019	3,446,056	131.3%	151.4%	1,990,195	2,612,840	3,013,365	131.3%	151.4%	5.00%	0.8744
	2017	1,626	2,145,041	3,359,161	3,738,104	156.6%	174.3%	1,786,388	2,797,505	3,113,089	156.6%	174.3%	5.00%	0.8328
	2018	1,544	2,013,146	3,669,925	4,037,957	182.3%	200.6%	1,596,710	2,910,771	3,202,672	182.3%	200.6%	5.00%	0.7931
Projected	2019	1,460	1,880,985	3,979,731	4,355,450	211.6%	231.6%	1,420,845	3,006,182	3,289,990	211.6%	231.6%	5.00%	0.7554
Future	2020	1,374	1,749,270	4,307,022	4,681,644	246.2%	267.6%	1,258,430	3,098,485	3,367,988	246.2%	267.6%	5.00%	0.7194
Experience	2021	1,286	1,618,727	4,643,453	5,018,302	286.9%	310.0%	1,109,064	3,181,442	3,438,268	286.9%	310.0%	5.00%	0.6851
	2022	1,199	1,490,303	4,990,274	5,347,990	334.8%	358.9%	972,452	3,256,252	3,489,669	334.8%	358.9%	5.00%	0.6525
	2023	1,111	1,364,995	5,338,326	5,696,121	391.1%	417.3%	848,272	3,317,488	3,539,839	391.1%	417.3%	5.00%	0.6214
	2024	1,023	1,243,263	5,700,173	6,053,349	458.5%	486.9%	735,831	3,373,674	3,582,703	458.5%	486.9%	5.00%	0.5919
	2025	937	1,125,732	6,060,844	6,391,997	538.4%	567.8%	634,542	3,416,322	3,602,984	538.4%	567.8%	5.00%	0.5637
	2026	852	1,013,080	6,425,728	6,706,223	634.3%	662.0%	543,851	3,449,521	3,600,099	634.3%	662.0%	5.00%	0.5368
	2027	770	905,949	6,785,468	6,953,346	749.0%	767.5%	463,181	3,469,181	3,555,011	749.0%	767.5%	5.00%	0.5113
	2028	691	804,815	7,114,615	7,075,135	884.0%	879.1%	391,881	3,464,250	3,445,026	884.0%	879.1%	5.00%	0.4869
	2029	615	710,043	7,381,662	7,094,035	1039.6%	999.1%	329,271	3,423,125	3,289,742	1039.6%	999.1%	5.00%	0.4637
	2030	544	622,030	7,576,058	7,049,016	1218.0%	1133.2%	274,720	3,345,974	3,113,205	1218.0%	1133.2%	5.00%	0.4417
	2031	477	540,915	7,697,738	6,951,763	1423.1%	1285.2%	227,520	3,237,823	2,924,051	1423.1%	1285.2%	5.00%	0.4206
	2032	415	466,675	7,748,539	6,789,121	1660.4%	1454.8%	186,945	3,103,991	2,719,658	1660.4%	1454.8%	5.00%	0.4006
	2033	358	399,525	7,727,686	6,561,593	1934.2%	1642.3%	152,425	2,948,226	2,503,345	1934.2%	1642.3%	5.00%	0.3815
	2034	306	339,481	7,633,938	6,263,525	2248.7%	1845.0%	123,350	2,773,771	2,275,835	2248.7%	1845.0%	5.00%	0.3633
	2035	260	286,236	7,464,488	5,889,274	2607.8%	2057.5%	99,051	2,583,050	2,037,955	2607.8%	2057.5%	5.00%	0.3460
	2036	218	239,423	7,217,497	5,455,162	3014.5%	2278.5%	78,906	2,378,647	1,797,840	3014.5%	2278.5%	5.00%	0.3296
	2037	182	198,629	6,896,464	4,976,847	3472.0%	2505.6%	62,344	2,164,615	1,562,099	3472.0%	2505.6%	5.00%	0.3139
	2038	151	163,410	6,509,326	4,475,312	3983.4%	2738.7%	48,848	1,945,812	1,337,791	3983.4%	2738.7%	5.00%	0.2989
	2039	123	133,292	6,068,308	3,971,844	4552.6%	2979.8%	37,947	1,727,600	1,130,753	4552.6%	2979.8%	5.00%	0.2847
	2040	100	107,788	5,588,801	3,483,943	5185.0%	3232.2%	29,225	1,515,322	944,620	5185.0%	3232.2%	5.00%	0.2711
	2041	81	86,403	5,087,563	3,026,662	5888.2%	3503.0%	22,311	1,313,732	781,557	5888.2%	3503.0%	5.00%	0.2582
	2042	64	68,648	4,580,685	2,606,664	6672.7%	3797.1%	16,882	1,126,518	641,051	6672.7%	3797.1%	5.00%	0.2459
	2043	51	54,053	4,082,072	2,227,832	7552.0%	4121.6%	12,660	956,091	521,796	7552.0%	4121.6%	5.00%	0.2342
	2044	40	42,173	3,602,922	1,888,690	8543.2%	4478.5%	9,407	803,681	421,298	8543.2%	4478.5%	5.00%	0.2231
	2045	31	32,597	3,151,293	1,587,680	9667.3%	4870.6%	6,925	669,466	337,289	9667.3%	4870.6%	5.00%	0.2124
	2046	23	24,956	2,732,145	1,321,070	10947.9%	5293.6%	5,049	552,782	267,286	10947.9%	5293.6%	5.00%	0.2023
	2047	18	18,918	2,347,734	1,084,548	12409.8%	5732.8%	3,645	452,387	208,983	12409.8%	5732.8%	5.00%	0.1927
	2048	13	14,197	1,998,838	879,333	14079.5%	6193.9%	2,605	366,817	161,371	14079.5%	6193.9%	5.00%	0.1835
	2049	10	10,543	1,685,692	702,751	15989.1%	6665.7%	1,843	294,619	122,824	15989.1%	6665.7%	5.00%	0.1748
	2050	7	7,745	1,407,452	552,863	18171.8%	7138.1%	1,289	234,276	92,026	18171.8%	7138.1%	5.00%	0.1665
	2051	5	5,627	1,162,757	427,784	20662.8%	7601.9%	892	184,329	67,815	20662.8%	7601.9%	5.00%	0.1585
	2052	4	4,042	950,134	326,758	23507.6%	8084.5%	610	143,450	49,333	23507.6%	8084.5%	5.00%	0.1510
	Past		41,199,188	17,340,838	20,096,852	42.1%	48.8%	65,919,306	22,909,335	30,346,585	34.8%	46.0%		
	Future		29,800,734	189,642,565	161,903,424	636.4%	543.3%	20,786,552	85,270,271	79,988,446	410.2%	384.8%		
	Lifetime		70,999,921	206,983,402	182,000,276	291.5%	256.3%	86,705,858	108,179,605	110,335,031	124.8%	127.3%		

EXHIBIT XI
RiverSource Life Insurance Company
Virginia Experience Projections with 15% Increase
Policy Form: 30225-VA

			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
	1992	0	0	0	0	0.0%	0.0%	0	0	0	0.0%	0.0%	5.00%	2.8202
	1993	292	98,888	0	0	0.0%	0.0%	265,599	0	0	0.0%	0.0%	5.00%	2.6859
	1994	748	418,230	6,490	387,631	1.6%	92.7%	1,069,817	16,602	991,546	1.6%	92.7%	5.00%	2.5580
	1995	1,435	902,340	21,320	213	2.4%	0.0%	2,198,239	51,940	518	2.4%	0.0%	5.00%	2.4362
	1996	2,393	1,529,333	36,792	155,443	2.4%	10.2%	3,548,276	85,363	360,651	2.4%	10.2%	5.00%	2.3201
	1997	2,963	2,145,118	114,365	826,897	5.3%	38.5%	4,739,989	252,709	1,827,165	5.3%	38.5%	5.00%	2.2097
	1998	3,018	2,525,593	96,075	1,429,632	3.8%	56.6%	5,314,962	202,185	3,008,576	3.8%	56.6%	5.00%	2.1044
Historical	1999	2,846	2,386,879	168,375	679,862	7.1%	28.5%	4,783,855	337,461	1,362,600	7.1%	28.5%	5.00%	2.0042
Experience	2000	2,760	2,297,144	311,758	21,598	13.6%	0.9%	4,384,767	595,081	41,227	13.6%	0.9%	5.00%	1.9088
	2001	2,695	2,227,711	442,777	805,162	19.9%	36.1%	4,049,745	804,922	1,463,700	19.9%	36.1%	5.00%	1.8179
	2002	2,643	2,167,337	547,360	1,571,307	25.3%	72.5%	3,752,373	947,661	2,720,450	25.3%	72.5%	5.00%	1.7313
	2003	2,569	2,102,370	761,208	1,381,359	36.2%	65.7%	3,466,566	1,255,145	2,277,702	36.2%	65.7%	5.00%	1.6489
	2004	2,511	2,035,594	1,021,139	1,529,432	50.2%	75.1%	3,196,629	1,603,563	2,401,768	50.2%	75.1%	5.00%	1.5704
	2005	2,466	1,964,083	995,965	716,605	50.7%	36.5%	2,937,457	1,489,553	1,071,746	50.7%	36.5%	5.00%	1.4956
	2006	2,378	2,068,834	1,250,293	1,314,435	60.4%	63.5%	2,946,782	1,780,878	1,872,240	60.4%	63.5%	5.00%	1.4244
	2007	2,300	2,293,050	1,337,956	965,508	58.3%	42.1%	3,110,617	1,814,993	1,309,752	58.3%	42.1%	5.00%	1.3565
	2008	2,234	2,228,600	1,542,727	1,247,936	69.2%	56.0%	2,879,227	1,993,117	1,612,264	69.2%	56.0%	5.00%	1.2919
	2009	2,165	2,362,148	1,389,060	2,092,374	58.8%	88.6%	2,906,442	1,709,132	2,574,506	58.8%	88.6%	5.00%	1.2304
	2010	2,099	2,564,764	1,650,590	1,007,494	64.4%	39.3%	3,005,471	1,934,213	1,180,614	64.4%	39.3%	5.00%	1.1718
	2011	2,052	2,515,138	1,971,187	1,974,607	78.4%	78.5%	2,806,970	2,199,904	2,203,721	78.4%	78.5%	5.00%	1.1160
	2012	1,998	2,450,850	2,063,176	894,884	84.2%	36.5%	2,604,974	2,192,920	951,160	84.2%	36.5%	5.00%	1.0629
	1/2013-9/2013	1,944	1,915,182	1,612,223	1,094,472	84.2%	57.1%	1,950,545	1,641,992	1,114,681	84.2%	57.1%	5.00%	1.0185
	10/2013-12/2013	1,926	652,989	870,083	698,670	133.2%	107.0%	649,018	864,793	694,422	133.2%	107.0%	5.00%	0.9939
	2014	1,840	2,578,414	2,476,709	2,932,983	96.1%	113.8%	2,485,768	2,387,718	2,827,597	96.1%	113.8%	5.00%	0.9641
	2015	1,758	2,680,623	2,633,279	3,181,694	98.2%	118.7%	2,461,243	2,417,773	2,921,306	98.2%	118.7%	5.00%	0.9182
	2016	1,683	2,565,149	2,988,334	3,427,267	116.5%	133.6%	2,243,066	2,613,115	2,996,935	116.5%	133.6%	5.00%	0.8744
	2017	1,604	2,417,591	3,349,577	3,683,611	138.6%	152.4%	2,013,367	2,789,524	3,067,707	138.6%	152.4%	5.00%	0.8328
	2018	1,524	2,268,942	3,644,418	3,972,583	160.6%	175.1%	1,799,593	2,890,540	3,150,822	160.6%	175.1%	5.00%	0.7931
Projected	2019	1,441	2,119,992	3,939,508	4,283,539	185.8%	202.1%	1,601,385	2,975,798	3,235,671	185.8%	202.1%	5.00%	0.7554
Future	2020	1,356	1,971,545	4,253,769	4,602,965	215.8%	233.5%	1,418,336	3,060,174	3,311,386	215.8%	233.5%	5.00%	0.7194
Experience	2021	1,270	1,824,417	4,578,939	4,932,603	251.0%	270.4%	1,249,992	3,137,240	3,379,552	251.0%	270.4%	5.00%	0.6851
	2022	1,183	1,679,677	4,915,625	5,255,330	292.7%	312.9%	1,096,023	3,207,542	3,429,206	292.7%	312.9%	5.00%	0.6525
	2023	1,096	1,538,449	5,254,026	5,596,107	341.5%	363.7%	956,065	3,265,101	3,477,686	341.5%	363.7%	5.00%	0.6214
	2024	1,010	1,401,250	5,606,453	5,945,774	400.1%	424.3%	829,336	3,318,205	3,519,034	400.1%	424.3%	5.00%	0.5919
	2025	925	1,268,785	5,957,938	6,277,183	469.6%	494.7%	715,177	3,358,317	3,538,266	469.6%	494.7%	5.00%	0.5637
	2026	841	1,141,819	6,313,961	6,584,614	553.0%	576.7%	612,962	3,389,521	3,534,815	553.0%	576.7%	5.00%	0.5368
	2027	760	1,021,075	6,665,334	6,826,197	652.8%	668.5%	522,041	3,407,760	3,490,004	652.8%	668.5%	5.00%	0.5113
	2028	682	907,090	6,987,028	6,944,816	770.3%	765.6%	441,681	3,402,125	3,381,572	770.3%	765.6%	5.00%	0.4869
	2029	607	800,276	7,247,992	6,962,518	905.7%	870.0%	371,115	3,361,137	3,228,754	905.7%	870.0%	5.00%	0.4637
	2030	537	701,079	7,437,772	6,917,560	1060.9%	986.7%	309,632	3,284,900	3,055,147	1060.9%	986.7%	5.00%	0.4417
	2031	471	609,655	7,556,240	6,821,418	1239.4%	1118.9%	256,433	3,178,306	2,869,225	1239.4%	1118.9%	5.00%	0.4206
	2032	409	525,980	7,605,200	6,661,196	1445.9%	1266.4%	210,703	3,046,571	2,668,412	1445.9%	1266.4%	5.00%	0.4006
	2033	353	450,297	7,583,908	6,437,404	1684.2%	1429.6%	171,795	2,893,373	2,455,965	1684.2%	1429.6%	5.00%	0.3815
	2034	302	382,623	7,491,159	6,144,503	1957.8%	1605.9%	139,025	2,721,893	2,232,589	1957.8%	1605.9%	5.00%	0.3633
	2035	256	322,612	7,324,216	5,776,964	2270.3%	1790.7%	111,638	2,534,509	1,999,090	2270.3%	1790.7%	5.00%	0.3460
	2036	216	269,849	7,081,286	5,350,797	2624.2%	1982.9%	88,933	2,333,757	1,763,445	2624.2%	1982.9%	5.00%	0.3296
	2037	180	223,871	6,765,809	4,881,358	3022.2%	2180.4%	70,267	2,123,606	1,532,127	3022.2%	2180.4%	5.00%	0.3139
	2038	149	184,176	6,385,577	4,389,221	3467.1%	2383.2%	55,055	1,908,820	1,312,056	3467.1%	2383.2%	5.00%	0.2989
	2039	122	150,231	5,952,580	3,895,255	3962.3%	2592.8%	42,770	1,694,653	1,108,949	3962.3%	2592.8%	5.00%	0.2847
	2040	99	121,485	5,481,912	3,416,614	4512.4%	2812.4%	32,939	1,486,341	926,365	4512.4%	2812.4%	5.00%	0.2711
	2041	80	97,383	4,990,006	2,968,050	5124.1%	3047.8%	25,147	1,288,540	766,422	5124.1%	3047.8%	5.00%	0.2582
	2042	63	77,372	4,492,636	2,556,089	5806.5%	3303.6%	19,028	1,104,864	628,613	5806.5%	3303.6%	5.00%	0.2459
	2043	50	60,922	4,003,432	2,184,529	6571.4%	3585.8%	14,269	937,672	511,654	6571.4%	3585.8%	5.00%	0.2342
	2044	39	47,532	3,533,368	1,851,918	7433.7%	3896.1%	10,603	788,166	413,096	7433.7%	3896.1%	5.00%	0.2231
	2045	30	36,740	3,090,339	1,556,720	8411.4%	4237.1%	7,805	656,517	330,712	8411.4%	4237.1%	5.00%	0.2124
	2046	23	28,127	2,679,202	1,295,271	9525.3%	4605.0%	5,691	542,071	262,066	9525.3%	4605.0%	5.00%	0.2023
	2047	18	21,323	2,302,162	1,063,341	10796.8%	4986.9%	4,109	443,606	204,896	10796.8%	4986.9%	5.00%	0.1927
	2048	13	16,001	1,959,976	862,117	12249.1%	5387.9%	2,936	359,685	158,212	12249.1%	5387.9%	5.00%	0.1835
	2049	10	11,882	1,652,869	688,977	13910.1%	5798.3%	2,077	288,882	120,417	13910.1%	5798.3%	5.00%	0.1748
	2050	7	8,730	1,380,010	542,016	15808.5%	6209.0%	1,453	229,708	90,221	15808.5%	6209.0%	5.00%	0.1665
	2051	5	6,342	1,140,057	419,383	17975.1%	6612.4%	1,005	180,730	66,484	17975.1%	6612.4%	5.00%	0.1585
	2052	4	4,555	931,563	320,336	20449.5%	7031.9%	688	140,646	48,364	20449.5%	7031.9%	5.00%	0.1510
	Past		41,199,188	17,340,838	20,096,852	42.1%	48.8%	65,919,306	22,909,335	30,346,585	34.8%	46.0%		
	Future		33,196,852	186,504,253	159,109,489	561.8%	479.3%	23,050,169	84,014,200	78,709,261	364.5%	341.5%		
	Lifetime		74,396,039	203,845,090	179,206,342	274.0%	240.9%	88,969,474	106,923,535	109,055,846	120.2%	122.6%		

EXHIBIT XII
RiverSource Life Insurance Company
Incurred Loss Ratio Including the Change in Active Life Reserves
Nationwide Experience, without Interest
Policy Form: 30225

Calendar Year	(a) Earned Premiums [1]	(b) Incurred Claims	(c) Change in Active Life Reserves	(d) = (b+c)/(a) Loss Ratio
1992	145	0	2,281	1574.9%
1993	2,687,161	147,465	2,187,746	86.9%
1994	12,916,809	1,546,420	6,728,825	64.1%
1995	26,751,336	3,369,053	20,553,179	89.4%
1996	42,758,453	6,593,399	40,805,281	110.9%
1997	58,783,795	7,424,220	62,937,799	119.7%
1998	67,697,736	13,305,497	85,338,045	145.7%
1999	66,592,712	18,669,759	97,436,710	174.4%
2000	63,713,697	19,274,006	99,581,777	186.5%
2001	61,140,894	23,482,824	99,140,594	200.6%
2002	58,984,823	31,882,410	98,790,662	221.5%
2003	56,853,917	35,876,618	98,106,868	235.7%
2004	55,057,979	33,373,239	96,998,189	236.8%
2005	50,157,191	29,998,753	94,262,483	247.7%
2006	52,775,548	39,771,059	82,526,046	231.7%
2007	60,977,339	44,353,590	87,342,836	216.0%
2008	59,305,602	46,598,165	78,634,716	211.2%
2009	63,016,024	52,752,330	68,093,179	191.8%
2010	67,630,762	49,544,460	72,418,451	180.3%
2011	65,407,470	66,353,503	(20,112,060)	70.7%
2012	62,193,076	67,431,878	63,535,007	210.6%
1/2013-9/2013	48,200,249	56,489,129	31,678,715	182.9%
Total	1,103,602,716	648,237,776	1,366,987,327	182.6%

[1] Premiums reflect the accumulated 105.3% rate increases as approved in Virginia and implemented from 2006 through 2013 on a nationwide basis.

EXHIBIT XIII
RiverSource Life Insurance Company
Incurred Loss Ratio Including the Change in Active Life Reserves
Virginia Experience, without Interest
Policy Form: 30225-VA

Calendar Year	(a) Earned Premiums	(b) Incurred Claims	(c) Change in Active Life Reserves	(d) = (b+c)/(a) Loss Ratio
1992	0	0	0	0.0%
1993	98,888	0	62,482	63.2%
1994	418,230	387,631	219,685	145.2%
1995	902,340	213	716,313	79.4%
1996	1,529,333	155,443	1,483,297	107.2%
1997	2,145,118	826,897	2,527,099	156.4%
1998	2,525,593	1,429,632	3,453,710	193.4%
1999	2,386,879	679,862	4,031,957	197.4%
2000	2,297,144	21,598	4,034,887	176.6%
2001	2,227,711	805,162	4,048,401	217.9%
2002	2,167,337	1,571,307	4,066,188	260.1%
2003	2,102,370	1,381,359	4,072,728	259.4%
2004	2,035,594	1,529,432	4,067,764	275.0%
2005	1,964,083	716,605	4,650,193	273.2%
2006	2,068,834	1,314,435	2,875,871	202.5%
2007	2,293,050	965,508	3,462,246	193.1%
2008	2,228,600	1,247,936	3,715,408	222.7%
2009	2,362,148	2,092,374	3,207,960	224.4%
2010	2,564,764	1,007,494	3,532,788	177.0%
2011	2,515,138	1,974,607	97,227	82.4%
2012	2,450,850	894,884	3,656,709	185.7%
1/2013-9/2013	1,915,182	1,094,472	1,542,758	137.7%
Total	41,199,188	20,096,852	59,525,670	193.3%

EXHIBIT XIV
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: 30225

1a	Accumulated value of past earned premiums	1,780,056,306	x	76.4%	=	1,359,963,018
1b	Present value of future projected earned premiums at current level	489,971,952	x	76.4%	=	374,338,571
2	Present value of increased portion of future projected earned premiums	52,827,983	x	80.0%	=	42,262,386
3	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1a, 1b and 2**	**2,322,856,241**				**1,776,563,976**
4	**Lifetime Incurred Claims with Rate Increase**					**2,721,866,602**
5	**Test: 4 is not less than 3**					**TRUE**

Virginia Experience
Using Actual History
Policy Form: 30225-VA

1a	Accumulated value of past earned premiums	65,919,306	x	76.4%	=	50,362,350
1b	Present value of future projected earned premiums at current level	20,786,552	x	76.4%	=	15,880,926
2	Present value of increased portion of future projected earned premiums	2,263,616	x	80.0%	=	1,810,893
3	**Lifetime Earned Premium Times Prescribed Factor: Sum of 1a, 1b and 2**	**88,969,474**				**68,054,168**
4	**Lifetime Incurred Claims with Rate Increase**					**109,055,846**
5	**Test: 4 is not less than 3**					**TRUE**

[1] As prescribed by NAIC Model Bulletin, where 76.4% is the lifetime loss ratio at the time of original pricing

EXHIBIT XV

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	47.22	34.92	88.30	65.72	110.88	82.14
41	47.22	34.92	88.30	65.72	110.88	82.14
42	47.22	34.92	88.30	65.72	110.88	82.14
43	47.22	34.92	88.30	65.72	110.88	82.14
44	47.22	34.92	88.30	65.72	110.88	82.14
45	47.22	34.92	88.30	65.72	110.88	82.14
46	51.34	39.00	92.40	69.80	117.04	88.30
47	51.34	39.00	94.46	69.80	119.08	88.30
48	53.38	39.00	96.48	71.88	121.14	90.34
49	53.38	41.08	96.48	73.92	123.22	92.40
50	55.44	41.08	98.56	73.92	125.24	94.46
51	57.50	43.12	102.64	78.04	129.36	98.56
52	61.60	45.18	106.78	80.06	135.50	102.64
53	63.64	47.22	110.88	84.18	141.66	106.78
54	67.76	51.34	117.04	88.30	149.90	112.90
55	75.96	57.50	129.36	98.56	166.32	125.24
56	82.14	63.64	141.66	108.82	180.68	141.66
57	90.34	69.80	153.98	119.08	197.12	151.94
58	100.62	78.04	170.40	129.36	215.60	166.32
59	112.90	84.18	186.86	141.66	238.18	180.68
60	125.24	98.56	205.32	162.20	260.76	205.32
61	139.64	112.90	232.02	188.90	291.54	236.12
62	153.98	121.14	252.54	201.20	320.32	252.54
63	176.58	143.72	289.50	234.04	365.48	295.66
64	199.18	156.06	324.42	254.62	408.58	322.34
65	221.76	180.68	355.18	289.50	447.58	365.48
66	242.28	193.02	381.90	305.92	482.50	386.00
67	268.96	213.54	420.90	334.68	527.68	418.86
68	295.66	242.28	457.86	373.68	572.84	466.08
69	332.60	262.80	509.20	404.48	634.44	503.04
70	367.52	291.54	558.46	443.48	691.94	550.28
71	402.44	318.26	603.64	478.40	741.20	589.26
72	441.42	351.10	659.08	525.62	798.68	636.50
73	490.70	394.22	720.66	579.00	864.38	696.02
74	539.98	435.30	788.42	634.44	930.10	749.40
75	599.54	476.34	870.56	691.94	999.98	802.80
76	669.34	529.72	956.78	757.64	999.98	868.48
77	747.36	597.48	999.98	847.96	999.98	954.74
78	827.42	659.08	999.98	921.88	999.98	999.98
79	899.30	724.78	999.98	999.98	999.98	999.98

EXHIBIT XV

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	36.96	26.68	65.72	47.22	82.14	59.54
41	36.96	26.68	65.72	47.22	82.14	59.54
42	36.96	26.68	65.72	47.22	82.14	59.54
43	36.96	26.68	65.72	47.22	82.14	59.54
44	36.96	26.68	65.72	47.22	82.14	59.54
45	36.96	26.68	65.72	47.22	82.14	59.54
46	39.00	28.76	67.76	49.26	86.22	61.60
47	41.08	28.76	69.80	49.26	88.30	63.64
48	41.08	28.76	69.80	51.34	88.30	63.64
49	41.08	30.80	71.88	53.38	90.34	65.72
50	43.12	30.80	73.92	53.38	92.40	65.72
51	45.18	32.84	75.96	57.50	100.62	71.88
52	47.22	32.84	78.04	57.50	102.64	73.92
53	49.26	34.92	82.14	59.54	104.72	75.96
54	53.38	36.96	86.22	61.60	110.88	80.06
55	57.50	41.08	94.46	67.76	123.22	88.30
56	63.64	47.22	104.72	75.96	133.46	98.56
57	69.80	51.34	112.90	84.18	143.72	106.78
58	78.04	57.50	125.24	90.34	158.10	114.98
59	86.22	61.60	137.56	98.56	174.52	125.24
60	96.48	71.88	151.94	114.98	190.94	143.72
61	106.78	84.18	170.40	131.40	213.54	166.32
62	119.08	90.34	184.78	141.66	234.04	176.58
63	135.50	104.72	211.46	164.26	266.92	207.36
64	151.94	114.98	236.12	178.62	299.76	225.86
65	170.40	133.46	260.76	203.28	328.50	256.64
66	184.78	141.66	279.24	215.60	353.16	271.04
67	207.36	158.10	308.00	234.04	388.06	293.60
68	227.88	176.58	336.74	260.76	420.90	326.44
69	254.62	193.02	371.64	283.34	464.00	353.16
70	281.30	213.54	408.58	310.02	507.12	386.00
71	308.00	234.04	441.42	334.68	544.12	412.68
72	340.84	258.70	482.50	367.52	585.14	445.56
73	377.78	289.50	527.68	406.54	632.38	486.62
74	414.74	320.32	576.96	445.56	681.68	525.62
75	461.98	351.10	638.52	484.56	739.16	560.54
76	515.36	390.10	700.14	529.72	804.84	607.76
77	574.88	439.40	776.08	593.38	874.64	667.28
78	636.50	484.56	847.96	644.70	942.42	718.62
79	691.94	533.84	913.66	704.24	999.98	767.90
80		581.04		755.58		819.22
81		630.34		813.08		872.62
82		687.82		872.62		934.20
83		749.40		944.48		999.88
84		811.00		999.98		999.98

EXHIBIT XV

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	32.84	24.66	57.50	43.12	71.88	53.38
41	32.84	24.66	57.50	43.12	71.88	53.38
42	32.84	24.66	57.50	43.12	71.88	53.38
43	32.84	24.66	57.50	43.12	71.88	53.38
44	32.84	24.66	57.50	43.12	71.88	53.38
45	32.84	24.66	57.50	43.12	71.88	53.38
46	34.92	26.68	59.54	45.18	75.96	57.50
47	34.92	26.68	61.60	47.22	78.04	59.54
48	36.96	26.68	63.64	47.22	80.06	59.54
49	36.96	28.76	63.64	49.26	80.06	61.60
50	39.00	28.76	65.72	49.26	82.14	61.60
51	41.08	30.80	67.76	51.34	86.22	67.76
52	41.08	30.80	69.80	53.38	88.30	69.80
53	45.18	32.84	73.92	55.44	94.46	73.92
54	47.22	34.92	78.04	59.54	98.56	75.96
55	51.34	39.00	84.18	63.64	108.82	82.14
56	57.50	43.12	92.40	71.88	119.08	90.34
57	63.64	49.26	100.62	78.04	129.36	100.62
58	69.80	53.38	112.90	86.22	143.72	108.82
59	78.04	59.54	123.22	94.46	158.10	119.08
60	86.22	67.76	135.50	106.78	172.48	135.50
61	96.48	78.04	151.94	123.22	190.94	153.98
62	106.78	84.18	166.32	131.40	211.46	166.32
63	123.22	98.56	193.02	156.06	242.28	195.04
64	137.56	108.82	213.54	168.36	268.96	211.46
65	151.94	125.24	234.04	190.94	293.60	240.22
66	166.32	133.46	250.50	201.20	314.16	252.54
67	186.86	147.82	277.18	219.70	349.02	277.18
68	207.36	168.36	303.88	246.38	379.84	310.02
69	229.96	182.74	334.68	266.92	416.80	332.60
70	252.54	201.20	367.52	291.54	455.82	361.36
71	275.12	217.62	394.22	312.08	484.56	383.94
72	305.92	244.32	435.30	347.00	527.68	418.86
73	340.84	275.12	478.40	383.94	574.88	461.98
74	373.68	299.76	519.46	418.86	611.84	492.78
75	414.74	328.50	572.84	453.74	663.18	527.68
76	459.90	363.42	624.18	494.82	716.56	566.70
77	517.40	414.74	700.14	558.46	788.42	630.34
78	576.96	459.90	767.90	611.84	854.12	679.60
79	622.10	500.98	821.28	661.12	905.46	726.82
80		537.94		700.14		772.00
81		581.04		749.40		823.34
82		624.18		798.68		876.72
83		665.26		845.92		925.98
84		702.20		886.98		973.20

EXHIBIT XV

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	28.76	20.52	49.26	36.96	61.60	45.18
41	28.76	20.52	49.26	36.96	61.60	45.18
42	28.76	20.52	49.26	36.96	61.60	45.18
43	28.76	20.52	49.26	36.96	61.60	45.18
44	28.76	20.52	49.26	36.96	61.60	45.18
45	28.76	20.52	49.26	36.96	61.60	45.18
46	28.76	22.58	51.34	39.00	63.64	47.22
47	30.80	22.58	53.38	39.00	65.72	49.26
48	30.80	22.58	53.38	39.00	65.72	49.26
49	30.80	22.58	53.38	39.00	67.76	51.34
50	32.84	24.66	55.44	41.08	69.80	55.44
51	32.84	24.66	57.50	43.12	71.88	57.50
52	34.92	26.68	59.54	45.18	75.96	59.54
53	36.96	28.76	61.60	47.22	78.04	61.60
54	39.00	28.76	65.72	49.26	84.18	61.60
55	43.12	32.84	71.88	53.38	92.40	69.80
56	49.26	34.92	80.06	57.50	102.64	73.92
57	53.38	41.08	86.22	65.72	110.88	84.18
58	59.54	45.18	94.46	71.88	121.14	92.40
59	65.72	49.26	104.72	80.06	131.40	100.62
60	75.96	55.44	119.08	88.30	149.90	110.88
61	82.14	61.60	129.36	96.48	162.20	121.14
62	92.40	69.80	145.78	110.88	184.78	139.64
63	104.72	75.96	162.20	119.08	205.32	149.90
64	121.14	86.22	186.86	135.50	236.12	170.40
65	133.46	96.48	203.28	147.82	256.64	186.86
66	149.90	106.78	225.86	162.20	283.34	203.28
67	164.26	117.04	244.32	172.48	308.00	217.62
68	180.68	131.40	266.92	193.02	332.60	240.22
69	197.12	141.66	287.46	205.32	359.30	256.64
70	213.54	156.06	308.00	225.86	381.90	279.24
71	234.04	170.40	334.68	242.28	412.68	297.72
72	254.62	184.78	361.36	262.80	439.40	318.26
73	277.18	203.28	386.00	285.40	464.00	342.86
74	303.88	223.80	420.90	310.02	496.86	365.48
75	334.68	242.28	461.98	334.68	533.84	388.06
76	369.58	268.96	503.04	365.48	579.00	418.86
77	410.64	299.76	554.36	404.48	622.10	455.82
78	451.72	330.58	601.58	441.42	669.34	490.70
79	494.82	361.36	654.94	476.34	714.52	529.72
80		394.22		513.30		568.72
81		431.16		554.36		613.92
82		470.16		597.48		661.12
83		513.30		644.70		710.40
84		560.54		696.02		763.80

EXHIBIT XVI

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	54.30	40.16	101.54	75.58	127.52	94.46
41	54.30	40.16	101.54	75.58	127.52	94.46
42	54.30	40.16	101.54	75.58	127.52	94.46
43	54.30	40.16	101.54	75.58	127.52	94.46
44	54.30	40.16	101.54	75.58	127.52	94.46
45	54.30	40.16	101.54	75.58	127.52	94.46
46	59.04	44.86	106.26	80.28	134.60	101.54
47	59.04	44.86	108.62	80.28	136.94	101.54
48	61.38	44.86	110.96	82.66	139.32	103.90
49	61.38	47.24	110.96	85.00	141.70	106.26
50	63.76	47.24	113.34	85.00	144.02	108.62
51	66.12	49.58	118.04	89.74	148.76	113.34
52	70.84	51.96	122.80	92.06	155.82	118.04
53	73.18	54.30	127.52	96.80	162.90	122.80
54	77.92	59.04	134.60	101.54	172.38	129.84
55	87.36	66.12	148.76	113.34	191.26	144.02
56	94.46	73.18	162.90	125.14	207.78	162.90
57	103.90	80.28	177.08	136.94	226.68	174.74
58	115.72	89.74	195.96	148.76	247.94	191.26
59	129.84	96.80	214.88	162.90	273.90	207.78
60	144.02	113.34	236.12	186.54	299.88	236.12
61	160.58	129.84	266.82	217.24	335.28	271.54
62	177.08	139.32	290.42	231.38	368.36	290.42
63	203.06	165.28	332.92	269.14	420.30	340.00
64	229.06	179.46	373.08	292.82	469.86	370.70
65	255.02	207.78	408.46	332.92	514.72	420.30
66	278.62	221.98	439.18	351.80	554.88	443.90
67	309.30	245.58	484.04	384.88	606.84	481.68
68	340.00	278.62	526.54	429.74	658.76	536.00
69	382.50	302.22	585.58	465.16	729.60	578.50
70	422.64	335.28	642.22	510.00	795.74	632.82
71	462.80	366.00	694.18	550.16	852.38	677.64
72	507.64	403.76	757.94	604.46	918.48	731.98
73	564.30	453.36	828.76	665.86	994.04	800.42
74	620.98	500.60	906.68	729.60	999.98	861.82
75	689.48	547.80	999.98	795.74	999.98	923.22
76	769.74	609.18	999.98	871.28	999.98	998.76
77	859.46	687.10	999.98	975.16	999.98	999.98
78	951.54	757.94	999.98	999.98	999.98	999.98
79	999.98	833.50	999.98	999.98	999.98	999.98

EXHIBIT XVI

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	42.50	30.68	75.58	54.30	94.46	68.48
41	42.50	30.68	75.58	54.30	94.46	68.48
42	42.50	30.68	75.58	54.30	94.46	68.48
43	42.50	30.68	75.58	54.30	94.46	68.48
44	42.50	30.68	75.58	54.30	94.46	68.48
45	42.50	30.68	75.58	54.30	94.46	68.48
46	44.86	33.08	77.92	56.64	99.16	70.84
47	47.24	33.08	80.28	56.64	101.54	73.18
48	47.24	33.08	80.28	59.04	101.54	73.18
49	47.24	35.42	82.66	61.38	103.90	75.58
50	49.58	35.42	85.00	61.38	106.26	75.58
51	51.96	37.76	87.36	66.12	115.72	82.66
52	54.30	37.76	89.74	66.12	118.04	85.00
53	56.64	40.16	94.46	68.48	120.42	87.36
54	61.38	42.50	99.16	70.84	127.52	92.06
55	66.12	47.24	108.62	77.92	141.70	101.54
56	73.18	54.30	120.42	87.36	153.48	113.34
57	80.28	59.04	129.84	96.80	165.28	122.80
58	89.74	66.12	144.02	103.90	181.82	132.22
59	99.16	70.84	158.20	113.34	200.70	144.02
60	110.96	82.66	174.74	132.22	219.58	165.28
61	122.80	96.80	195.96	151.12	245.58	191.26
62	136.94	103.90	212.50	162.90	269.14	203.06
63	155.82	120.42	243.18	188.90	306.96	238.46
64	174.74	132.22	271.54	205.42	344.72	259.74
65	195.96	153.48	299.88	233.78	377.78	295.14
66	212.50	162.90	321.12	247.94	406.14	311.70
67	238.46	181.82	354.20	269.14	446.26	337.64
68	262.06	203.06	387.26	299.88	484.04	375.40
69	292.82	221.98	427.38	325.84	533.60	406.14
70	323.50	245.58	469.86	356.52	583.18	443.90
71	354.20	269.14	507.64	384.88	625.74	474.58
72	391.96	297.50	554.88	422.64	672.92	512.40
73	434.44	332.92	606.84	467.52	727.24	559.62
74	476.96	368.36	663.50	512.40	783.94	604.46
75	531.28	403.76	734.30	557.24	850.04	644.62
76	592.66	448.62	805.16	609.18	925.56	698.92
77	661.12	505.32	892.50	682.38	999.98	767.38
78	731.98	557.24	975.16	741.40	999.98	826.42
79	795.74	613.92	999.98	809.88	999.98	883.08
80		668.20		868.92		942.10
81		724.90		935.04		999.98
82		791.00		999.98		999.98
83		861.82		999.98		999.98
84		932.66		999.98		999.98

EXHIBIT XVI

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	37.76	28.36	66.12	49.58	82.66	61.38
41	37.76	28.36	66.12	49.58	82.66	61.38
42	37.76	28.36	66.12	49.58	82.66	61.38
43	37.76	28.36	66.12	49.58	82.66	61.38
44	37.76	28.36	66.12	49.58	82.66	61.38
45	37.76	28.36	66.12	49.58	82.66	61.38
46	40.16	30.68	68.48	51.96	87.36	66.12
47	40.16	30.68	70.84	54.30	89.74	68.48
48	42.50	30.68	73.18	54.30	92.06	68.48
49	42.50	33.08	73.18	56.64	92.06	70.84
50	44.86	33.08	75.58	56.64	94.46	70.84
51	47.24	35.42	77.92	59.04	99.16	77.92
52	47.24	35.42	80.28	61.38	101.54	80.28
53	51.96	37.76	85.00	63.76	108.62	85.00
54	54.30	40.16	89.74	68.48	113.34	87.36
55	59.04	44.86	96.80	73.18	125.14	94.46
56	66.12	49.58	106.26	82.66	136.94	103.90
57	73.18	56.64	115.72	89.74	148.76	115.72
58	80.28	61.38	129.84	99.16	165.28	125.14
59	89.74	68.48	141.70	108.62	181.82	136.94
60	99.16	77.92	155.82	122.80	198.36	155.82
61	110.96	89.74	174.74	141.70	219.58	177.08
62	122.80	96.80	191.26	151.12	243.18	191.26
63	141.70	113.34	221.98	179.46	278.62	224.30
64	158.20	125.14	245.58	193.62	309.30	243.18
65	174.74	144.02	269.14	219.58	337.64	276.26
66	191.26	153.48	288.08	231.38	361.28	290.42
67	214.88	170.00	318.76	252.66	401.38	318.76
68	238.46	193.62	349.46	283.34	436.82	356.52
69	264.46	210.16	384.88	306.96	479.32	382.50
70	290.42	231.38	422.64	335.28	524.20	415.56
71	316.38	250.26	453.36	358.90	557.24	441.54
72	351.80	280.96	500.60	399.06	606.84	481.68
73	391.96	316.38	550.16	441.54	661.12	531.28
74	429.74	344.72	597.38	481.68	703.62	566.70
75	476.96	377.78	658.76	521.80	762.66	606.84
76	528.88	417.94	717.80	569.04	824.04	651.70
77	595.02	476.96	805.16	642.22	906.68	724.90
78	663.50	528.88	883.08	703.62	982.24	781.54
79	715.42	576.12	944.48	760.28	999.98	835.84
80		618.64		805.16		887.80
81		668.20		861.82		946.84
82		717.80		918.48		999.98
83		765.04		972.80		999.98
84		807.54		999.98		999.98

EXHIBIT XVI

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	33.08	23.60	56.64	42.50	70.84	51.96
41	33.08	23.60	56.64	42.50	70.84	51.96
42	33.08	23.60	56.64	42.50	70.84	51.96
43	33.08	23.60	56.64	42.50	70.84	51.96
44	33.08	23.60	56.64	42.50	70.84	51.96
45	33.08	23.60	56.64	42.50	70.84	51.96
46	33.08	25.96	59.04	44.86	73.18	54.30
47	35.42	25.96	61.38	44.86	75.58	56.64
48	35.42	25.96	61.38	44.86	75.58	56.64
49	35.42	25.96	61.38	44.86	77.92	59.04
50	37.76	28.36	63.76	47.24	80.28	63.76
51	37.76	28.36	66.12	49.58	82.66	66.12
52	40.16	30.68	68.48	51.96	87.36	68.48
53	42.50	33.08	70.84	54.30	89.74	70.84
54	44.86	33.08	75.58	56.64	96.80	70.84
55	49.58	37.76	82.66	61.38	106.26	80.28
56	56.64	40.16	92.06	66.12	118.04	85.00
57	61.38	47.24	99.16	75.58	127.52	96.80
58	68.48	51.96	108.62	82.66	139.32	106.26
59	75.58	56.64	120.42	92.06	151.12	115.72
60	87.36	63.76	136.94	101.54	172.38	127.52
61	94.46	70.84	148.76	110.96	186.54	139.32
62	106.26	80.28	167.64	127.52	212.50	160.58
63	120.42	87.36	186.54	136.94	236.12	172.38
64	139.32	99.16	214.88	155.82	271.54	195.96
65	153.48	110.96	233.78	170.00	295.14	214.88
66	172.38	122.80	259.74	186.54	325.84	233.78
67	188.90	134.60	280.96	198.36	354.20	250.26
68	207.78	151.12	306.96	221.98	382.50	276.26
69	226.68	162.90	330.58	236.12	413.20	295.14
70	245.58	179.46	354.20	259.74	439.18	321.12
71	269.14	195.96	384.88	278.62	474.58	342.38
72	292.82	212.50	415.56	302.22	505.32	366.00
73	318.76	233.78	443.90	328.22	533.60	394.28
74	349.46	257.38	484.04	356.52	571.38	420.30
75	384.88	278.62	531.28	384.88	613.92	446.26
76	425.02	309.30	578.50	420.30	665.86	481.68
77	472.24	344.72	637.52	465.16	715.42	524.20
78	519.48	380.16	691.82	507.64	769.74	564.30
79	569.04	415.56	753.18	547.80	821.70	609.18
80		453.36		590.30		654.02
81		495.84		637.52		706.00
82		540.68		687.10		760.28
83		590.30		741.40		816.96
84		644.62		800.42		878.38

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

January 10, 2014

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-129329714
Policy Form: Nursing Home Indemnity Policy 30225-VA

Dear Commissioner Cunningham:

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

30225–VA is an existing individual policy form providing benefits for confinement in a nursing home and was previously approved in 1992. This form was issued in Virginia from January 1993 through January 2001 and is no longer being marketed in any state, and, outside of Virginia, was last issued in 2002.

The company is requesting the approval of a premium rate increase on the above-listed form. At this time, a premium rate increase of 15% 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 15% 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, four prior increases have been approved and implemented on this form. A 35% increase was approved in October 2005 and implemented on each contract's next policy anniversary beginning in March 2006. A 15% increase was approved in May 2008 and implemented on each contract's next policy anniversary beginning in August 2008. A 15% increase was approved in May 2009 and implemented on each contract's next policy anniversary beginning in August 2009. A 15% increase was approved in May 2012 and implemented on each contract's next policy anniversary beginning in October 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 or the optional nonforfeiture benefit rider.

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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;
- 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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Suite 1850
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USA

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Fax +1 952 897 5301

milliman.com

January 10, 2014

To: Virginia Bureau of Insurance

RE: RiverSource Life Insurance Company
Company NAIC # 65005
SERFF Tracking # AERS-129329714
Policy Form: Nursing Home Indemnity Policy 30225-VA

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 January 2014. 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 this 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: January 10, 2014 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 September 30, 2013, which is the most recent data available.

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-129329714

Effective Date: Upon approval

(Projected) Number of Insureds Affected: 1,944

New Rates

Average Annual Premium Per Member:

Revised Rates

Average Annual Premium Per Member: $1,556

Average Requested Percentage Rate Change Per Member: 15%

Minimum Requested Percentage Rate Change Per Member: 15%

Maximum Requested Percentage Rate Change Per Member: 15%

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

Form#	"Product Name"(if applicable)
30225-VA	

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

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

Narrative: Explanation of Justification of Rate Increase

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

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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-129329714
Policy Form: Nursing Home Indemnity Policy 30225-VA

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

   The company has addressed all objections raised in the prior filing that was submitted in Virginia on February 23, 2011 and approved on May 15, 2012, SERFF Tracking # AERS-126909861.

2. *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 originally anticipated.*

   Policy form 30225-VA was originally priced with a target lifetime incurred loss ratio of 76.4%, which is lower than the currently anticipated lifetime incurred loss ratios, both with and without the requested increase, for both nationwide and Virginia-specific experience.

3. *Please provide an explanation as to why an additional rate increase is needed and a comparison of the difference 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 91.4%, which represents the lifetime incurred loss ratio using historical experience combined with projections based on our original pricing assumptions. The lifetime loss ratios in the table below reflect actual historical experience (i.e. only the

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projection period assumptions vary). Please note that Table 1 has been developed using nationwide historical experience through September 30, 2013, where actual and projected premiums reflect the accumulated rate increase as approved in Virginia and implemented from 2006 through 2013 on a nationwide basis, and the loss ratios correspond to Exhibit X of the Actuarial Memorandum.

Table 1
RiverSource Life Insurance Company
Nationwide Experience
Impact on the Lifetime Loss Ratio of Changing
From Original Pricing to Current Assumptions
Policy Form: 30225

Assumptions	Lifetime Loss Ratio	Impact on Lifetime Loss Ratio	Increase Needed to Product a Lifetime Loss Ratio of 91.4%
Historical Experience through 9/30/2013 & Projections with Original Pricing Assumptions	91.4%	N/A	N/A
Historical Experience through 9/30/2013 & Projections with Original Pricing Assumptions except for Current:			
Morbidity	94.3%	2.9%	18.2%
Mortality	93.7%	2.3%	14.0%
Lapse	113.7%	22.3%	117.0%
Historical Experience through 9/30/2013 & Projections with All Current Assumptions	121.2%	29.8%	151.0%

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. 29.8%) is greater than the sum of each changed assumption's impact on the incurred lifetime loss ratio (i.e. 27.5% = 2.9% + 2.3% + 22.3%).

As can be seen by the results in Table 1, a rate increase that far exceeds the requested 15% increase is justified; however, we have chosen to limit the current rate increase request to 15% 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 41.7% rate increase was justifiable (SERFF Tracking #AERS-126909858, response letters dated June 29, 2011 and October 11, 2011). However, we chose to limit the requested rate increase at that time to 15% to minimize the impact on policyholders to the extent that we could.

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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.

4. *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 three (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.

5. *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 136.1% increase) from inception, while Attachment 4 provides corresponding information for Virginia-specific experience. Please note that RiverSource Life does not consider Virginia-specific experience to be fully credible but is providing it as generally requested.

6. *Please provide sufficient detail or documentation so that any projections can be recreated. An 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 X and XI 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 September 30, 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 X are based on the premium inforce at the time of projection, adjusted to reflect the cumulative 105.3% rate increases as previously approved in Virginia and implemented on a nationwide basis, and the projected earned premium for each policy in Exhibit XI 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 136.1% proposed increase from inception.

   The projected paid and incurred claims for each policy in Exhibits X and XI 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.

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

7. *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 46 states (including the District of Columbia) where this policy form was offered, with the status of all currently requested rate increases as of February 21, 2014 and the history of all previous rate revisions which first began in 2005.

   As this attachment shows, the cumulative 136.1% premium increase currently requested in Virginia has been approved in 32 states. We have rate increase requests pending in California, Nevada and Ohio to bring premium increases to the cumulative 136.1% currently requested in Virginia, and we will soon request rate increases in North Carolina and Texas to bring premium increases to the cumulative 136.1% currently requested in Virginia.

   The company anticipates requesting a 24.8% rate increase in Georgia, a 20.2% rate increase in Indiana, a 15% rate increase in Maryland and New Mexico, a 2.7% rate increase in North Dakota, a 9.3% rate increase in Pennsylvania and a 4% rate increase in Tennessee to bring premiums in these states to the level currently requested in Virginia. We will also soon request rate increases in Arkansas, Connecticut, Florida, Hawaii, Kansas, Louisiana, Maine, New Hampshire 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.

8. *Please provide an explanation of what steps the company has taken to minimize the 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 long-term care ("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

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policyholder premiums is a very difficult decision to make, we believe it is necessary at this time to sustain this block of business.

9. *Please explain, if any, margins are included in the proposed rates to ensure that future rate increase 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 2013 asset adequacy analysis as well as our annual GAAP gross premium valuation.

10. *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 premiums.*

    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.

11. *Please provide a copy of the letter notifying Virginia policyholders there will be a rate increase. Any form used to amend existing coverage will need to be filed for review and approval. If the 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 the 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 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

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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 this policy form when originally approved on October 16, 1992.

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

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

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

13. *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.

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14. *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)."

15. *Please provide documentation supporting the company's assertion that a 472.3% rate increase is justified.*

    The Overall Percentage change of 472.3% is the rate increase that would be required to produce a lifetime loss ratio of 60%.

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.

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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 X and XI Actuarial Memorandum, and Attachments 3 and 4 of this Response
	Sample Policyholder Notification Letters and FAQ
	Rate Summary Form
	Revised Actuarial Memorandum

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

Policy Form: 30225-VA

Original Pricing Assumptions

Mortality: 1983 Individual Annuitant Mortality Table

Lapse Rates:

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

Morbidity: Starting in 1989, RiverSource Life marketed nursing home policies with a zero day prior hospitalization requirement. Using the emerging experience on this business, statistics from the "1985 National Nursing Home Survey" published by the National Center for Health Statistics, and input provided from RiverSource Life's reinsurer, both the expected frequencies and expected severities of claims for the non-increasing benefit were developed. It should be noted that considerable judgment was made with regard to the frequency and severity of claims, especially for the Assisted Living Facility benefit. Claim costs for the Benefit Increase Options are based on these claim costs with the benefit loaded to reflect the scheduled increases in benefits.

The following selection factors were used:

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

Interest Rate: 5%

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

Policy Form: 30225-VA

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%	66%	71%	73%	88%
10	55%	66%	66%	74%	73%	88%
11	57%	67%	71%	78%	74%	88%
12	57%	67%	72%	78%	90%	89%
13	57%	67%	75%	83%	90%	92%
14	57%	68%	77%	89%	90%	95%
15	57%	69%	78%	90%	95%	98%
16	64%	69%	81%	90%	95%	100%
17	67%	69%	81%	91%	100%	100%
18	70%	70%	84%	95%	100%	100%
19	72%	70%	85%	96%	100%	100%
20	72%	73%	86%	97%	100%	100%
21	75%	75%	88%	100%	100%	100%
22	80%	77%	90%	100%	100%	100%
23	80%	80%	95%	100%	100%	100%
24	85%	82%	95%	100%	100%	100%
25	85%	85%	100%	100%	100%	100%
26	85%	90%	100%	100%	100%	100%
27	87%	90%	100%	100%	100%	100%
28	87%	95%	100%	100%	100%	100%
29	90%	95%	100%	100%	100%	100%
30	90%	100%	100%	100%	100%	100%
31	90%	100%	100%	100%	100%	100%
32	95%	100%	100%	100%	100%	100%
33	95%	100%	100%	100%	100%	100%
34	95%	100%	100%	100%	100%	100%
35+	100%	100%	100%	100%	100%	100%

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

Policy Form: 30225-VA

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%	1.2%	1.3%
11	0.8%	1.0%	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%	1.3%	1.8%
19	0.7%	1.3%	1.8%
20	0.8%	1.3%	1.9%
21	0.8%	1.3%	1.9%
22	0.8%	1.3%	2.0%
23	0.8%	1.3%	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 1.3% of inforce policyholders is assumed to lapse, and a 0.7% reduction in benefits due to election of reduced benefit options is also assumed.

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

Policy Form: 30225-VA

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 2012. 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	0.05	0.40	1.00	0.90	1.00	1.00	1.85
2	0.10	0.45	1.00	0.95	1.00	2.40	1.85
3	0.15	0.45	1.00	1.40	1.50	2.40	1.85
4	0.20	0.45	1.00	1.40	2.00	2.15	1.85
5	0.25	0.55	1.00	1.40	2.00	2.15	1.85
6	0.30	0.55	1.00	1.40	2.00	2.00	1.85
7	0.35	0.55	1.00	1.40	2.00	2.00	1.85
8	0.40	0.55	1.00	1.40	2.00	1.70	1.85
9	0.45	0.60	1.00	1.40	1.75	1.75	1.85
10	0.45	0.65	1.00	1.40	1.60	1.75	1.85
11	0.45	0.65	1.00	1.40	1.60	1.85	1.85
12	0.55	0.65	1.00	1.40	1.60	1.70	1.85
13	0.55	0.65	1.00	1.40	1.60	1.70	1.85
14	0.55	0.65	1.00	1.40	1.60	1.70	1.85
15	0.65	0.70	1.10	1.40	1.60	1.70	1.85
16	0.65	0.70	1.15	1.40	1.60	1.70	1.85
17	0.65	0.70	1.15	1.40	1.60	1.70	1.85
18	0.70	0.70	1.15	1.40	1.60	1.70	1.85
19	0.70	0.70	1.15	1.40	1.60	1.70	1.85
20	0.75	0.75	1.15	1.40	1.60	1.70	1.85
21	0.75	0.75	1.20	1.40	1.60	1.70	1.85
22	0.75	0.75	1.20	1.40	1.60	1.70	1.85
23	0.75	0.80	1.20	1.40	1.60	1.70	1.85
24	0.80	0.80	1.25	1.40	1.60	1.70	1.85
25	0.80	0.85	1.25	1.40	1.60	1.70	1.85
26	0.85	0.85	1.25	1.40	1.60	1.70	1.85
27	0.85	0.90	1.25	1.40	1.60	1.70	1.85
28	0.85	0.90	1.25	1.40	1.60	1.70	1.85
29	0.90	0.95	1.25	1.40	1.60	1.70	1.85
30+	1.00	1.00	1.25	1.40	1.60	1.70	1.85

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

Policy Form: 30225-VA

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	0.10	0.30	0.55	0.45	0.70	1.35	1.00	2.00
2	0.10	0.30	0.55	0.50	0.75	1.35	1.00	2.00
3	0.10	0.30	0.55	0.75	0.80	1.35	1.90	2.00
4	0.20	0.30	0.60	0.75	0.85	1.35	1.90	2.00
5	0.20	0.30	0.60	0.75	0.90	1.35	1.90	2.00
6	0.20	0.30	0.70	0.75	0.95	1.35	1.90	2.00
7	0.30	0.30	0.70	0.75	1.00	1.35	1.50	2.00
8	0.35	0.30	0.70	0.75	1.05	1.35	1.50	1.50
9	0.40	0.30	0.70	0.75	1.05	1.35	1.50	1.50
10	0.40	0.30	0.70	1.00	1.10	1.35	1.50	1.50
11	0.45	0.30	0.70	1.00	1.10	1.35	1.50	1.75
12	0.45	0.35	0.70	1.05	1.15	1.35	1.50	1.75
13	0.45	0.40	0.70	1.05	1.15	1.35	1.50	1.75
14	0.45	0.45	0.90	1.05	1.20	1.35	1.50	1.75
15	0.45	0.55	0.95	1.10	1.20	1.40	1.50	1.90
16	0.45	0.65	1.00	1.10	1.20	1.40	1.50	1.90
17	0.45	0.65	1.00	1.10	1.30	1.40	1.50	1.90
18	0.50	0.75	1.00	1.15	1.35	1.40	1.50	1.90
19	0.50	0.75	1.00	1.15	1.35	1.40	1.50	1.90
20	0.55	0.75	1.00	1.15	1.35	1.40	1.50	1.90
21	0.60	0.75	1.00	1.15	1.35	1.40	1.50	2.00
22	0.65	0.75	1.00	1.15	1.35	1.40	1.50	2.00
23	0.70	0.75	1.00	1.15	1.35	1.40	1.50	2.00
24	0.75	0.75	1.00	1.15	1.35	1.40	1.50	2.00
25	0.75	0.85	1.00	1.15	1.35	1.40	1.50	2.00
26	0.80	0.85	1.00	1.15	1.35	1.40	1.50	2.00
27	0.90	0.85	1.00	1.15	1.35	1.40	1.50	2.00
28	0.90	0.90	1.00	1.15	1.35	1.40	1.50	2.00
29	0.95	0.95	1.00	1.15	1.35	1.40	1.50	2.00
30	0.95	0.95	1.00	1.15	1.35	1.40	1.50	2.00
31	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
32	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
33	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
34	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
35+	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00

The following adverse selection factors are used:

Year of Policyholder Notification *	Without Current Requested Increase	With Current Requested Increase
1	0.0%	2.0%
2	0.0%	1.0%
3	0.0%	0.0%

* For currently requested increase

Interest Rate: 5.0%

Attachment 2
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Forms: 30225-VA

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 Forms: 30225-VA

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 Forms: 30225-VA

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	0.40	0.40	0.40	1.00	1.00	1.00	1.00	2.50
2	0.32	0.40	0.40	1.00	1.00	1.00	2.40	2.50
3	0.27	0.40	0.40	1.60	1.60	1.50	2.40	2.40
4	0.23	0.40	0.40	1.60	1.60	2.00	2.15	2.40
5	0.20	0.40	0.50	1.60	1.10	2.00	2.15	2.40
6	0.18	0.40	0.50	1.00	1.10	2.00	2.00	2.40
7	0.20	0.40	0.50	1.00	1.10	2.00	2.00	1.90
8	0.24	0.40	0.50	1.00	1.40	2.00	1.70	1.90
9	0.28	0.40	0.50	1.00	1.40	1.75	1.70	1.90
10	0.32	0.40	0.60	0.85	1.40	1.60	1.70	1.90
11	0.36	0.40	0.60	0.75	1.45	1.60	1.80	1.90
12	0.40	0.50	0.60	0.80	1.50	1.60	1.65	1.90
13	0.40	0.50	0.60	0.95	1.50	1.60	1.65	1.90
14	0.40	0.50	0.65	0.95	1.50	1.60	1.65	1.90
15	0.40	0.60	0.70	1.05	1.50	1.60	1.65	1.90
16	0.40	0.60	0.80	1.10	1.50	1.60	1.65	1.90
17	0.50	0.60	0.80	1.15	1.50	1.60	1.65	1.90
18	0.50	0.60	0.90	1.15	1.50	1.60	1.65	1.90
19	0.50	0.65	0.95	1.20	1.50	1.60	1.65	1.90
20	0.60	0.70	0.95	1.25	1.50	1.60	1.65	1.90
21	0.60	0.80	1.00	1.25	1.50	1.60	1.65	1.90
22	0.60	0.80	1.00	1.30	1.50	1.60	1.65	1.90
23	0.60	0.90	1.05	1.30	1.50	1.60	1.65	1.90
24	0.65	0.95	1.05	1.30	1.50	1.60	1.65	1.90
25	0.70	0.95	1.10	1.30	1.50	1.60	1.65	1.90
26	0.80	1.00	1.10	1.30	1.50	1.60	1.65	1.90
27	0.80	1.00	1.15	1.30	1.50	1.60	1.65	1.90
28	0.90	1.05	1.15	1.30	1.50	1.60	1.65	1.90
29	0.95	1.05	1.15	1.30	1.50	1.60	1.65	1.90
30	0.95	1.10	1.15	1.30	1.50	1.60	1.65	1.90
31	1.00	1.10	1.15	1.30	1.50	1.60	1.65	1.90
32	1.00	1.10	1.15	1.30	1.50	1.60	1.65	1.90
33	1.05	1.10	1.15	1.30	1.50	1.60	1.65	1.90
34	1.05	1.10	1.15	1.30	1.50	1.60	1.65	1.90
35+	1.10	1.10	1.15	1.30	1.50	1.60	1.65	1.90

Attachment 2
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Forms: 30225-VA

Prior 2011 Rate Increase Filing Assumptions (cont):

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	0.30	0.30	0.30	0.40	0.50	0.50	1.60	1.00	2.00
2	0.24	0.30	0.30	0.40	0.50	0.50	1.60	1.00	2.00
3	0.20	0.30	0.30	0.55	0.75	0.80	1.50	1.90	2.00
4	0.17	0.30	0.30	0.55	0.75	0.80	1.50	1.90	2.00
5	0.15	0.35	0.35	0.55	0.75	0.80	1.50	1.90	2.00
6	0.13	0.35	0.35	0.55	0.75	0.80	1.50	1.90	2.00
7	0.15	0.35	0.35	0.55	0.75	1.05	1.35	1.50	2.00
8	0.18	0.35	0.35	0.55	0.75	1.05	1.35	1.50	1.50
9	0.21	0.35	0.35	0.55	0.75	1.05	1.35	1.50	1.50
10	0.28	0.35	0.35	0.70	1.00	1.05	1.35	1.50	1.50
11	0.32	0.40	0.40	0.70	1.00	1.15	1.35	1.50	1.75
12	0.35	0.40	0.40	0.70	1.05	1.20	1.35	1.50	1.75
13	0.35	0.40	0.50	0.70	1.05	1.20	1.35	1.50	1.75
14	0.35	0.40	0.50	0.90	1.05	1.20	1.35	1.50	1.75
15	0.35	0.40	0.55	0.90	1.05	1.30	1.35	1.50	1.75
16	0.40	0.40	0.60	0.90	1.05	1.30	1.35	1.50	1.75
17	0.40	0.40	0.65	0.90	1.05	1.30	1.35	1.50	1.75
18	0.40	0.50	0.70	0.90	1.05	1.30	1.35	1.50	1.75
19	0.40	0.50	0.75	0.90	1.10	1.30	1.35	1.50	1.75
20	0.40	0.55	0.75	0.90	1.10	1.30	1.35	1.50	1.75
21	0.40	0.60	0.75	1.00	1.10	1.30	1.35	1.50	1.75
22	0.40	0.65	0.85	1.00	1.10	1.30	1.35	1.50	1.75
23	0.50	0.70	0.85	1.00	1.10	1.30	1.35	1.50	1.75
24	0.50	0.75	0.85	1.00	1.10	1.30	1.35	1.50	1.75
25	0.55	0.75	0.90	1.00	1.10	1.30	1.35	1.50	1.75
26	0.60	0.80	0.95	1.00	1.10	1.30	1.35	1.50	1.75
27	0.65	0.85	0.95	1.00	1.10	1.30	1.35	1.50	1.75
28	0.70	0.85	1.00	1.00	1.10	1.30	1.35	1.50	1.75
29	0.75	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.75
30	0.75	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.75
31	0.80	0.95	1.00	1.00	1.10	1.30	1.35	1.50	1.75
32	0.85	0.95	1.00	1.00	1.10	1.30	1.35	1.50	1.75
33	0.85	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
34	0.90	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
35	0.90	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
36	0.95	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
37	0.95	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
38+	1.00	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75

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: 5.0%

Attachment 3
RiverSource Life Insurance Company
Nationwide Experience Projections
Experience with Premiums Restated to Proposed Virginia Premium Level since Inception*
Policy Form: 30225

		Loss Ratio Demonstration						Interest Rate Factors	
		Without Interest			With Interest			Calendar Year	Mid-Year
	Calendar Year	Earned Premiums	Incurred Claims	Incurred Loss Ratio	Earned Premiums	Incurred Claims	Incurred Loss Ratio	Effective Int Rate	Disc / Accum Factor
Historical Experience	1992	342	0	0.0%	965	0	0.0%	5.00%	2.8202
	1993	6,344,814	159,539	2.5%	17,041,279	428,499	2.5%	5.00%	2.6859
	1994	30,498,632	1,673,032	5.5%	78,014,328	4,279,550	5.5%	5.00%	2.5580
	1995	63,164,142	3,644,892	5.8%	153,877,567	8,879,516	5.8%	5.00%	2.4362
	1996	100,959,483	7,133,228	7.1%	234,240,791	16,550,135	7.1%	5.00%	2.3201
	1997	138,797,854	8,032,072	5.8%	306,696,529	17,748,175	5.8%	5.00%	2.2097
	1998	159,845,081	14,394,874	9.0%	336,384,585	30,293,167	9.0%	5.00%	2.1044
	1999	157,235,945	20,198,330	12.8%	315,136,963	40,482,095	12.8%	5.00%	2.0042
	2000	150,438,132	20,852,049	13.9%	287,154,843	39,802,189	13.9%	5.00%	1.9088
	2001	144,363,337	25,405,461	17.6%	262,437,460	46,184,473	17.6%	5.00%	1.8179
	2002	139,272,513	34,492,757	24.8%	241,126,547	59,718,311	24.8%	5.00%	1.7313
	2003	134,241,105	38,813,988	28.9%	221,348,119	63,999,794	28.9%	5.00%	1.6489
	2004	130,000,611	36,105,645	27.8%	204,148,603	56,699,095	27.8%	5.00%	1.5704
	2005	118,200,742	32,206,840	27.2%	176,779,508	48,168,135	27.2%	5.00%	1.4956
	2006	111,801,018	42,147,502	37.7%	159,245,870	60,033,582	37.7%	5.00%	1.4244
	2007	106,881,540	46,443,619	43.5%	144,989,256	63,002,702	43.5%	5.00%	1.3565
	2008	102,273,418	48,670,641	47.6%	132,131,569	62,879,761	47.6%	5.00%	1.2919
	2009	96,463,491	54,505,849	56.5%	118,690,920	67,065,263	56.5%	5.00%	1.2304
	2010	91,256,174	50,668,917	55.5%	106,936,873	59,375,440	55.5%	5.00%	1.1718
	2011	86,474,756	67,695,003	78.3%	96,508,434	75,549,664	78.3%	5.00%	1.1160
	2012	81,814,350	68,597,308	83.8%	86,959,315	72,911,108	83.8%	5.00%	1.0629
	1/2013-9/2013	58,110,599	56,877,319	97.9%	59,183,594	57,927,542	97.9%	5.00%	1.0185
Projected Future Experience	10/2013-12/2013	19,023,944	19,587,615	103.0%	18,908,275	19,468,518	103.0%	5.00%	0.9939
	2014	73,297,477	81,563,789	111.3%	70,663,811	78,633,104	111.3%	5.00%	0.9641
	2015	66,712,682	87,202,826	130.7%	61,252,966	80,066,213	130.7%	5.00%	0.9182
	2016	63,074,856	92,532,076	146.7%	55,155,102	80,913,639	146.7%	5.00%	0.8744
	2017	58,767,348	97,953,656	166.7%	48,941,381	81,575,694	166.7%	5.00%	0.8328
	2018	54,519,281	104,004,108	190.8%	43,241,520	82,490,004	190.8%	5.00%	0.7931
	2019	50,347,739	110,168,993	218.8%	38,031,329	83,218,696	218.8%	5.00%	0.7554
	2020	46,272,239	116,265,813	251.3%	33,288,387	83,641,972	251.3%	5.00%	0.7194
	2021	42,310,863	122,153,707	288.7%	28,989,106	83,693,086	288.7%	5.00%	0.6851
	2022	38,487,785	127,796,549	332.0%	25,114,038	83,389,767	332.0%	5.00%	0.6525
	2023	34,824,918	133,413,520	383.1%	21,641,852	82,909,477	383.1%	5.00%	0.6214
	2024	31,336,072	138,907,414	443.3%	18,546,399	82,212,994	443.3%	5.00%	0.5919
	2025	28,030,893	143,881,483	513.3%	15,800,203	81,101,828	513.3%	5.00%	0.5637
	2026	24,921,639	148,144,978	594.4%	13,378,673	79,528,606	594.4%	5.00%	0.5368
	2027	22,020,472	151,081,846	686.1%	11,258,325	77,243,051	686.1%	5.00%	0.5113
	2028	19,332,029	151,717,655	784.8%	9,413,157	73,874,399	784.8%	5.00%	0.4869
	2029	16,858,933	150,223,605	891.1%	7,818,053	69,663,729	891.1%	5.00%	0.4637
	2030	14,603,672	147,226,998	1008.2%	6,449,727	65,022,954	1008.2%	5.00%	0.4417
	2031	12,561,773	143,010,998	1138.5%	5,283,733	60,153,289	1138.5%	5.00%	0.4206
	2032	10,725,902	137,588,586	1282.8%	4,296,695	55,116,680	1282.8%	5.00%	0.4006
	2033	9,091,671	131,032,928	1441.2%	3,468,607	49,990,996	1441.2%	5.00%	0.3815
	2034	7,651,872	123,409,043	1612.8%	2,780,288	44,840,354	1612.8%	5.00%	0.3633
	2035	6,393,916	114,893,563	1796.9%	2,212,583	39,758,358	1796.9%	5.00%	0.3460
	2036	5,303,358	105,657,695	1992.3%	1,747,811	34,821,268	1992.3%	5.00%	0.3296
	2037	4,365,429	95,927,107	2197.4%	1,370,191	30,108,942	2197.4%	5.00%	0.3139
	2038	3,565,380	86,036,066	2413.1%	1,065,788	25,718,486	2413.1%	5.00%	0.2989
	2039	2,888,705	76,244,850	2639.4%	822,392	21,706,313	2639.4%	5.00%	0.2847
	2040	2,321,339	66,789,697	2877.2%	629,397	18,109,052	2877.2%	5.00%	0.2711
	2041	1,849,838	57,865,762	3128.2%	477,673	14,942,341	3128.2%	5.00%	0.2582
	2042	1,461,527	49,636,929	3396.2%	359,430	12,207,101	3396.2%	5.00%	0.2459
	2043	1,144,638	42,188,093	3685.7%	268,094	9,881,167	3685.7%	5.00%	0.2342
	2044	888,419	35,525,184	3998.7%	198,174	7,924,382	3998.7%	5.00%	0.2231
	2045	683,193	29,619,523	4335.5%	145,139	6,292,422	4335.5%	5.00%	0.2124
	2046	520,372	24,424,851	4693.7%	105,285	4,941,768	4693.7%	5.00%	0.2023
	2047	392,445	19,891,280	5068.5%	75,621	3,832,868	5068.5%	5.00%	0.1927
	2048	292,933	15,975,877	5453.8%	53,758	2,931,815	5453.8%	5.00%	0.1835
	2049	216,319	12,641,127	5843.7%	37,807	2,209,369	5843.7%	5.00%	0.1748
	2050	157,964	9,850,568	6235.9%	26,294	1,639,663	6235.9%	5.00%	0.1665
	2051	114,011	7,557,720	6628.9%	18,074	1,198,105	6628.9%	5.00%	0.1585
	2052	81,287	5,719,065	7035.6%	12,273	863,455	7035.6%	5.00%	0.1510
	Past	2,208,438,079	678,718,864	30.7%	3,739,033,914	951,978,197	25.5%		
	Future	777,415,136	3,515,313,141	452.2%	553,347,406	1,817,835,923	328.5%		
	Lifetime	2,985,853,214	4,194,032,004	140.5%	4,292,381,321	2,769,814,120	64.5%		

* Proposed Virginia rate schedule reflects a cumulative rate increase of 136.1% from four rate increases of 35%, 15%, 15% and 15% plus requested 15% rate increase.

Attachment 4
RiverSource Life Insurance Company
Virginia Experience Projections
Experience with Premiums Restated to Proposed Virginia Premium Level since Inception*
Policy Form: 30225-VA

		Loss Ratio Demonstration						Interest Rate Factors	
		Without Interest			With Interest			Calendar Year	Mid-Year
	Calendar Year	Earned Premiums	Incurred Claims	Incurred Loss Ratio	Earned Premiums	Incurred Claims	Incurred Loss Ratio	Effective Int Rate	Disc / Accum Factor
Historical Experience	1992	0	0	0.0%	0	0	0.0%	5.00%	2.8202
	1993	233,490	0	0.0%	627,122	0	0.0%	5.00%	2.6859
	1994	987,508	419,368	42.5%	2,526,008	1,072,728	42.5%	5.00%	2.5580
	1995	2,130,568	230	0.0%	5,190,391	561	0.0%	5.00%	2.4362
	1996	3,610,997	168,170	4.7%	8,378,043	390,179	4.7%	5.00%	2.3201
	1997	5,064,964	894,599	17.7%	11,191,865	1,976,762	17.7%	5.00%	2.2097
	1998	5,963,326	1,546,681	25.9%	12,549,468	3,254,900	25.9%	5.00%	2.1044
	1999	5,635,800	735,525	13.1%	11,295,439	1,474,162	13.1%	5.00%	2.0042
	2000	5,423,922	23,367	0.4%	10,353,129	44,602	0.4%	5.00%	1.9088
	2001	5,259,978	871,084	16.6%	9,562,091	1,583,539	16.6%	5.00%	1.8179
	2002	5,117,426	1,699,957	33.2%	8,859,948	2,943,185	33.2%	5.00%	1.7313
	2003	4,964,029	1,494,457	30.1%	8,185,111	2,464,187	30.1%	5.00%	1.6489
	2004	4,806,361	1,654,653	34.4%	7,547,748	2,598,411	34.4%	5.00%	1.5704
	2005	4,459,316	771,366	17.3%	6,669,296	1,153,645	17.3%	5.00%	1.4956
	2006	4,273,335	1,398,684	32.7%	6,086,805	1,992,241	32.7%	5.00%	1.4244
	2007	4,015,007	1,009,120	25.1%	5,446,523	1,368,913	25.1%	5.00%	1.3565
	2008	3,842,915	1,302,309	33.9%	4,964,832	1,682,511	33.9%	5.00%	1.2919
	2009	3,618,846	2,159,332	59.7%	4,452,713	2,656,892	59.7%	5.00%	1.2304
	2010	3,462,313	1,028,702	29.7%	4,057,248	1,205,466	29.7%	5.00%	1.1718
	2011	3,324,931	2,012,104	60.5%	3,710,723	2,245,569	60.5%	5.00%	1.1160
	2012	3,222,774	907,535	28.2%	3,425,440	964,607	28.2%	5.00%	1.0629
	1/2013-9/2013	2,307,468	1,094,472	47.4%	2,350,074	1,114,681	47.4%	5.00%	1.0185
Projected Future Experience	10/2013-12/2013	750,937	698,670	93.0%	746,371	694,422	93.0%	5.00%	0.9939
	2014	2,913,580	2,932,983	100.7%	2,808,892	2,827,597	100.7%	5.00%	0.9641
	2015	2,680,623	3,181,694	118.7%	2,461,243	2,921,306	118.7%	5.00%	0.9182
	2016	2,565,149	3,427,267	133.6%	2,243,066	2,996,935	133.6%	5.00%	0.8744
	2017	2,417,591	3,683,611	152.4%	2,013,367	3,067,707	152.4%	5.00%	0.8328
	2018	2,268,942	3,972,583	175.1%	1,799,593	3,150,822	175.1%	5.00%	0.7931
	2019	2,119,992	4,283,539	202.1%	1,601,385	3,235,671	202.1%	5.00%	0.7554
	2020	1,971,545	4,602,965	233.5%	1,418,336	3,311,386	233.5%	5.00%	0.7194
	2021	1,824,417	4,932,603	270.4%	1,249,992	3,379,552	270.4%	5.00%	0.6851
	2022	1,679,677	5,255,330	312.9%	1,096,023	3,429,206	312.9%	5.00%	0.6525
	2023	1,538,449	5,596,107	363.7%	956,065	3,477,686	363.7%	5.00%	0.6214
	2024	1,401,250	5,945,774	424.3%	829,336	3,519,034	424.3%	5.00%	0.5919
	2025	1,268,785	6,277,183	494.7%	715,177	3,538,266	494.7%	5.00%	0.5637
	2026	1,141,819	6,584,614	576.7%	612,962	3,534,815	576.7%	5.00%	0.5368
	2027	1,021,075	6,826,197	668.5%	522,041	3,490,004	668.5%	5.00%	0.5113
	2028	907,090	6,944,816	765.6%	441,681	3,381,572	765.6%	5.00%	0.4869
	2029	800,276	6,962,518	870.0%	371,115	3,228,754	870.0%	5.00%	0.4637
	2030	701,079	6,917,560	986.7%	309,632	3,055,147	986.7%	5.00%	0.4417
	2031	609,655	6,821,418	1118.9%	256,433	2,869,225	1118.9%	5.00%	0.4206
	2032	525,980	6,661,196	1266.4%	210,703	2,668,412	1266.4%	5.00%	0.4006
	2033	450,297	6,437,404	1429.6%	171,795	2,455,965	1429.6%	5.00%	0.3815
	2034	382,623	6,144,503	1605.9%	139,025	2,232,589	1605.9%	5.00%	0.3633
	2035	322,612	5,776,964	1790.7%	111,638	1,999,090	1790.7%	5.00%	0.3460
	2036	269,849	5,350,797	1982.9%	88,933	1,763,445	1982.9%	5.00%	0.3296
	2037	223,871	4,881,358	2180.4%	70,267	1,532,127	2180.4%	5.00%	0.3139
	2038	184,176	4,389,221	2383.2%	55,055	1,312,056	2383.2%	5.00%	0.2989
	2039	150,231	3,895,255	2592.8%	42,770	1,108,949	2592.8%	5.00%	0.2847
	2040	121,485	3,416,614	2812.4%	32,939	926,365	2812.4%	5.00%	0.2711
	2041	97,383	2,968,050	3047.8%	25,147	766,422	3047.8%	5.00%	0.2582
	2042	77,372	2,556,089	3303.6%	19,028	628,613	3303.6%	5.00%	0.2459
	2043	60,922	2,184,529	3585.8%	14,269	511,654	3585.8%	5.00%	0.2342
	2044	47,532	1,851,918	3896.1%	10,603	413,096	3896.1%	5.00%	0.2231
	2045	36,740	1,556,720	4237.1%	7,805	330,712	4237.1%	5.00%	0.2124
	2046	28,127	1,295,271	4605.0%	5,691	262,066	4605.0%	5.00%	0.2023
	2047	21,323	1,063,341	4986.9%	4,109	204,896	4986.9%	5.00%	0.1927
	2048	16,001	862,117	5387.9%	2,936	158,212	5387.9%	5.00%	0.1835
	2049	11,882	688,977	5798.3%	2,077	120,417	5798.3%	5.00%	0.1748
	2050	8,730	542,016	6209.0%	1,453	90,221	6209.0%	5.00%	0.1665
	2051	6,342	419,383	6612.4%	1,005	66,484	6612.4%	5.00%	0.1585
	2052	4,555	320,336	7031.9%	688	48,364	7031.9%	5.00%	0.1510
	Past	81,725,273	21,191,715	25.9%	137,430,018	32,187,740	23.4%		
	Future	33,629,967	159,109,489	473.1%	23,470,645	78,709,261	335.4%		
	Lifetime	115,355,240	180,301,204	156.3%	160,900,663	110,897,001	68.9%		

* Proposed Virginia rate schedule reflects a cumulative rate increase of 136.1% from four rate increases of 35%, 15%, 15% and 15% plus requested 15% rate increase.

Attachment 5
RiverSource Life Insurance Company
Status of Long Term Care Rate Filings as of February 19, 2014
Policy Form: 30225

	Initial Nationwide Request			Follow-Up to Initial Request			Second Nationwide Request			Third Nationwide Request			Fourth Nationwide Request			Fifth 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 September 30, 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	8/9/2011	15.0%	1/1/2012	11/12/2012	12/4/2012	15.0%	4/1/2013	136.1%	850,844
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	15.0%	5/1/2011	Not Required	Not Required	15.0%	4/1/2013	136.1%	11,757
Arizona	4/4/2005	25.0%	7/1/2005	4/6/2007	8.0%	7/1/2007	3/12/2008	15.0%	7/1/2008	2/3/2009	15.0%	7/1/2009	8/25/2011	15.0%	1/1/2012	6/27/2013	8/5/2013	15.0%	11/1/2013	136.1%	898,895
Arkansas	8/15/2005	35.0%	12/1/2005				1/11/2008	15.0%	4/1/2008	1/30/2009	15.0%	5/1/2009	Not Yet Submitted							78.5%	399,224
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	32.3% Increase - Submitted 12/18/2012			32.3% Increase - Submitted 12/18/2012				78.5%	6,764,503
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	8/8/2011	15.0%	11/1/2011	6/11/2013	8/8/2013	15.0%	1/1/2014	136.1%	855,425
Connecticut	4/7/2008	10.0%	7/1/2008	5/29/2009	19.0%	9/1/2009	3/1/2011	15.0%	10/1/2011	9/24/2013	10.0%	1/1/2014	Not Yet Submitted							65.6%	2,317,562
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	8/4/2011	15.0%	11/1/2011	1/28/2013	3/6/2013	15.0%	6/1/2013	136.1%	239,405
District of Columbia	Not Filing						Not Filing			Not Filing			Not Filing							0.0%	34,535
Florida	10/20/2008	7.0%	1/1/2009	Not Yet Submitted																7.0%	1,811,848
Georgia	3/2/2005	15.0%	6/1/2005	10/12/2006	10.0%	5/1/2007	4/15/2008	10.0%	7/1/2008	2/24/2009	10.0%	7/1/2009	2/16/2011	12.5%	5/1/2011	1/14/2013	1/16/2013	9.9%	4/1/2013	89.2%	555,109
Hawaii	5/3/2006	25.0%	8/1/2006	6/13/2008	8.0%	9/1/2008	8/31/2010	15.0%	12/1/2010	6/27/2013	15.0%	10/1/2013								78.5%	820,269
Idaho	2/9/2005	35.0%	5/1/2005				1/17/2008	15.0%	4/1/2008	2/13/2009	15.0%	5/1/2009	5/12/2011	15.0%	8/1/2011	6/4/2013	12/19/2013	15.0%	4/1/2014	136.1%	131,205
Illinois	9/8/2004	35.0%	1/1/2005				2/8/2008	15.0%	5/1/2008	1/7/2009	15.0%	5/1/2009	3/29/2011	15.0%	7/1/2011	11/7/2012	7/1/2013	15.0%	10/1/2013	136.1%	3,014,723
Indiana	8/25/2005	35.0%	12/1/2005				4/25/2008	15.0%	8/1/2008	5/22/2009	15.0%	8/1/2009	4/10/2013	10.0%	7/1/2013					96.4%	1,384,625
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	8/19/2011	15.0%	11/1/2011	12/4/2012	4/3/2013	15.0%	7/1/2013	136.1%	2,609,504
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	10.0%	12/1/2013					87.9%	1,165,265
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	2/22/2011	15.0%	6/1/2011	1/28/2013	4/23/2013	15.0%	8/1/2013	136.1%	581,762
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	Not Yet Submitted							78.5%	444,265
Maine	12/7/2004	35.0%	3/1/2005				1/29/2008	15.0%	5/1/2008	1/20/2010	15.0%	5/1/2010	Not Yet Submitted							78.5%	404,605
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	15.0%	9/1/2013					105.3%	1,627,681
Massachusetts [2]	11/3/2004	35.0%	5/1/2005				12/11/2007	15.0%	4/1/2008	12/17/2008	15.0%	4/1/2009	8/9/2011	15.0%	1/1/2012	11/12/2012	12/4/2012	15.0%	4/1/2013	136.1%	2,728,584
Mississippi	12/6/2004	25.0%	3/1/2005	6/4/2007	8.0%	10/1/2007	3/23/2008	15.0%	10/1/2008	4/23/2009	15.0%	10/1/2009	3/1/2011	15.0%	6/1/2011	2/27/2013	4/22/2013	15.0%	8/1/2013	136.1%	189,490
Missouri	12/22/2004	12.0%	3/1/2005	10/16/2006	20.5%	5/1/2007	3/6/2008	15.0%	6/1/2008	3/24/2009	15.0%	6/1/2009	1/24/2012	15.0%	6/1/2012	8/16/2013	8/28/2013	15.0%	12/1/2013	136.1%	1,317,425
Montana	9/27/2004	35.0%	1/1/2005				4/20/2008	15.0%	7/1/2008	3/20/2009	15.0%	7/1/2009	1/14/2011	15.0%	5/1/2011	2/7/2013	2/21/2013	15.0%	4/1/2013	136.1%	389,976
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	5/11/2011	15.0%	8/1/2011	12/12/2012	3/21/2013	15.0%	7/1/2013	136.1%	1,040,186
Nevada	11/12/2004	35.0%	2/1/2005				10/3/2008	15.0%	1/1/2009	5/15/2009	15.0%	1/1/2010	4/27/2012	15.0%	8/1/2012	12/19/2013				105.3%	353,302
New Hampshire	8/20/2004	35.0%	1/1/2005				1/24/2008	15.0%	4/1/2008	3/9/2009	15.0%	6/1/2009	6/21/2011	15.0%	9/1/2011	2/7/2013	9/13/2013	10.0%	TBD	125.8%	743,682
New Jersey [2]	11/3/2004	35.0%	2/1/2005				12/11/2007	15.0%	4/1/2008	12/17/2008	15.0%	4/1/2009	8/9/2011	15.0%	1/1/2012	11/12/2012	12/4/2012	15.0%	4/1/2013	136.1%	3,461,634
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	10/7/2013	15.0%	1/1/2014					105.3%	230,490
North Carolina	3/21/2005	35.0%	6/1/2005				2/21/2008	15.0%	5/1/2008	3/18/2009	15.0%	6/1/2009	4/14/2011	10.0%	7/1/2011					96.4%	1,178,522
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	2/15/2011	12.0%	5/1/2011	1/29/2013	3/20/2013	15.0%	7/1/2013	130.0%	484,750
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	3/17/2011	15.0%	6/1/2011	12/3/2012				105.3%	4,399,336
Oklahoma	11/16/2004	35.0%	2/1/2005				1/11/2008	15.0%	4/1/2008	12/22/2008	15.0%	4/1/2009	9/15/2011	15.0%	1/1/2012	7/23/2013	9/16/2013	15.0%	12/1/2013	136.1%	479,945
Pennsylvania	1/3/2006	30.0%	3/1/2006	5/17/2007	3.8%	8/1/2007	1/29/2008	15.0%	8/1/2008 #	6/24/2009	10.0%	9/1/2009	3/23/2011	10.0%	6/1/2011	2/13/2013	5/8/2013	15.0%	8/1/2013	116.0%	4,659,371
South Carolina	10/21/2004	35.0%	1/1/2005				5/12/2008	15.0%	8/1/2008	4/3/2009	15.0%	8/1/2009	5/12/2011	15.0%	8/1/2011	12/14/2012	3/22/2013	15.0%	7/1/2013	136.1%	1,005,073
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	12/14/2010	15.0%	5/1/2011	11/28/2012	2/5/2013	15.0%	5/1/2013	136.1%	702,989
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	2/17/2011	6.0%	5/1/2011	2/7/2013	4/8/2013	20.0%	7/1/2013	127.1%	1,350,603
Texas	11/22/2004	35.0%	2/1/2005				3/6/2008	15.0%	6/1/2008	9/22/2009	14.0%	1/1/2010	9/9/2011	13.0%	12/1/2011					100.0%	2,432,592
Utah	1/24/2005	35.0%	4/1/2005				2/13/2008	15.0%	5/1/2008	7/12/2009	15.0%	10/1/2009	3/21/2011	15.0%	6/1/2011	6/13/2013	12/11/2013	15.0%	3/1/2014	136.1%	388,799
Vermont	12/8/2005	35.0%	3/1/2006				4/4/2008	15.0%	7/1/2008	Not Yet Submitted										55.3%	96,851
Virginia	10/31/2005	35.0%	3/1/2006				5/13/2008	15.0%	8/1/2008	5/14/2009	15.0%	8/1/2009	5/15/2012	15.0%	10/1/2012	1/10/2014				105.3%	2,631,609
Washington	10/18/2004	30.0%	1/1/2005	11/22/2006	3.8%	5/1/2007	6/19/2008	15.0%	9/1/2008	2/1/2010	8.9%	5/1/2010	7/6/2012	21.5%	10/1/2012	1/13/2014	2/18/2014	15.0%	6/1/2014	136.1%	1,842,831
West Virginia	11/22/2004	35.0%	2/1/2005				1/9/2008	15.0%	4/1/2008	2/2/2009	15.0%	5/1/2009	4/29/2011	15.0%	8/1/2011	5/24/2013	8/12/2013	15.0%	11/1/2013	136.1%	423,150
Wisconsin [3]	1/24/2005	35.0%	4/1/2005				7/14/2008	15% or 10%	10/1/2008	5/11/2009	15% or 0%	10/1/2009	3/17/2011	15% or 10%	6/1/2011	12/10/2012	2/6/2013	15% or 10%	6/1/2013	136.1% or 105.3% or 96.3% or 87.8% or 79.7%	2,368,604
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	1/27/2011	15.0%	5/1/2011	6/6/2013	6/13/2013	15.0%	9/1/2013	136.1%	134,172

[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.
[3] Rate increases vary pursuant to Wisconsin regulations.

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 30225
With No Increase

1	Present Value of Future Claims:	1,846,317,226
2	9/30/2013 Statutory Active Life Reserves:	1,366,987,327
3	Present Value of Future Premiums:	489,971,952
	Anticipated Loss Ratio = (1 - 2) / 3	**97.8%**

Policy Form 30225
With 15% Increase

1	Present Value of Future Claims:	1,817,835,923
2	9/30/2013 Statutory Active Life Reserves:	1,366,987,327
3	Present Value of Future Premiums:	542,799,935
	Anticipated Loss Ratio = (1 - 2) / 3	**83.1%**

Virginia Experience
Using Actual History

Policy Form 30225-VA
With No Increase

1	Present Value of Future Claims:	79,988,446
2	9/30/2013 Statutory Active Life Reserves:	59,525,670
3	Present Value of Future Premiums:	20,786,552
	Anticipated Loss Ratio = (1 - 2) / 3	**98.4%**

Policy Form 30225-VA
With 15% Increase

1	Present Value of Future Claims:	78,709,261
2	9/30/2013 Statutory Active Life Reserves:	59,525,670
3	Present Value of Future Premiums:	23,050,169
	Anticipated Loss Ratio = (1 - 2) / 3	**83.2%**

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>

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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

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291524-VA

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-129329714
Policy Form: Nursing Home Indemnity Policy 30225-VA

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 15% 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 15% 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-129329714

Effective Date: Upon approval

(Projected) Number of Insureds Affected: 1,944

New Rates

Average Annual Premium Per Member:

Revised Rates

Average Annual Premium Per Member: $1,556

Average Requested Percentage Rate Change Per Member: 15%

Minimum Requested Percentage Rate Change Per Member: 15%

Maximum Requested Percentage Rate Change Per Member: 15%

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

Form#	"Product Name"(if applicable)
30225-VA	

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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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: *30225 2014/30225 2014*

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_30225_20140219.pdf (Superceded)
12/09/2013	Withdrawn 12/03/2014	Rate	VA ExhXV Premiums 30225	05/30/2014	VA ExhXV_Premiums_30225_20140110.pdf (Superceded)
12/09/2013	Withdrawn 12/03/2014	Supporting Document	L&H Actuarial Memorandum	02/19/2014	VA ActMem_30225_20140110.pdf (Superceded)

RIVERSOURCE LIFE INSURANCE COMPANY

Address: 227 Ameriprise Financial Center, Minneapolis MN 55474

Actuarial Memorandum for 30225 Series

February 2014

Policy form 30225-VA is an individual policy form providing benefits to individuals for confinement in a nursing home. This form was issued in Virginia from January 15, 1993 through January 15, 2001.

1. Purpose of Filing

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

2. Description of Benefits

This is an individually underwritten policy form which pays a daily benefit for confinement in a nursing home. Benefits are payable under skilled, intermediate or custodial levels of care. Hospital confinement is not a pre-requisite for benefit entitlement.

The confinement daily benefit is selected at issue. The maximum period for which confinement benefits are payable is also selected at issue. The choices are: 730 days (2 years), 1,095 days (3 years), 1,460 days (4 years), and unlimited. This policy also pays 60% of the confinement daily benefit for stays in a qualified Assisted Living Facility (ALF). A qualified ALF is one that has a minimum of 10 inpatients and has a 24-hour awake, trained, and ready to respond staff.

Confinement benefit payments commence after an elimination period of 20 days or 100 days, depending on the plan initially chosen. During the continuation of confinement benefit payments, the premiums are waived after 90 days.

Benefit eligibility for nursing home coverage is based on any one of the following: sickness or injury (1996 and prior issues only), 2 or more Activities of Daily Living (ADL) deficiencies out of 5 ADLs, or cognitive impairment. As defined in the policy, the 5 ADLs are: Continence, Dressing, Feeding, Toileting, and Transferring. Benefit eligibility for ALF coverage is based on 2 or more out of 5 ADL deficiencies or cognitive impairment.

If temporary hospitalization is required during a period of confinement in a nursing home or an ALF, and there is a charge for reserving a bed in the facility, this policy will pay the daily benefit for up to 21 days during any confinement period.

At issue, the insured may choose to elect either the Simple Benefit Increase Option or the Compound Benefit Increase Option. The Simple Benefit Increase Option will increase the original daily limits by a fixed amount (5% of the original maximum daily benefits) each year from the second year on for life. The Compound Benefit Increase Option will increase the previous year's daily limits by 5% per year from the second year on for life. The increasing benefits apply even when the policy is in claim status.

3. Renewability

This policy form is guaranteed renewable for life.

4. Applicability

This filing is applicable to inforce policies only, as this policy form is no longer being sold in the market. The premium changes will apply to the base form but not the optional home care rider or the optional nonforfeiture benefit 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.

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

Starting in 1989, RiverSource Life marketed nursing home policies with a zero day prior hospitalization requirement. Using the emerging experience on this business, statistics from the "1985 National Nursing Home Survey" published by the National Center for Health Statistics, and input provided from RiverSource Life's reinsurer, both the expected frequencies and expected severities of claims for the non-increasing benefit were developed. It should be noted that considerable judgment was made with regard to the frequency and severity of claims, especially for the ALF benefit.

Claim costs for the Benefit Increase Options are based on these claim costs with the benefit loaded to reflect the scheduled increases in benefits.

Actual-to-expected adjustment factors were developed from actual emerging experience through anniversaries ending December 2012 and are shown in the following tables:

RIVERSOURCE LIFE INSURANCE COMPANY

Address: 227 Ameriprise Financial Center, Minneapolis MN 55474

Actuarial Memorandum for 30225 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	0.05	0.40	1.00	0.90	1.00	1.00	1.85
2	0.10	0.45	1.00	0.95	1.00	2.40	1.85
3	0.15	0.45	1.00	1.40	1.50	2.40	1.85
4	0.20	0.45	1.00	1.40	2.00	2.15	1.85
5	0.25	0.55	1.00	1.40	2.00	2.15	1.85
6	0.30	0.55	1.00	1.40	2.00	2.00	1.85
7	0.35	0.55	1.00	1.40	2.00	2.00	1.85
8	0.40	0.55	1.00	1.40	2.00	1.70	1.85
9	0.45	0.60	1.00	1.40	1.75	1.75	1.85
10	0.45	0.65	1.00	1.40	1.60	1.75	1.85
11	0.45	0.65	1.00	1.40	1.60	1.85	1.85
12	0.55	0.65	1.00	1.40	1.60	1.70	1.85
13	0.55	0.65	1.00	1.40	1.60	1.70	1.85
14	0.55	0.65	1.00	1.40	1.60	1.70	1.85
15	0.65	0.70	1.10	1.40	1.60	1.70	1.85
16	0.65	0.70	1.15	1.40	1.60	1.70	1.85
17	0.65	0.70	1.15	1.40	1.60	1.70	1.85
18	0.70	0.70	1.15	1.40	1.60	1.70	1.85
19	0.70	0.70	1.15	1.40	1.60	1.70	1.85
20	0.75	0.75	1.15	1.40	1.60	1.70	1.85
21	0.75	0.75	1.20	1.40	1.60	1.70	1.85
22	0.75	0.75	1.20	1.40	1.60	1.70	1.85
23	0.75	0.80	1.20	1.40	1.60	1.70	1.85
24	0.80	0.80	1.25	1.40	1.60	1.70	1.85
25	0.80	0.85	1.25	1.40	1.60	1.70	1.85
26	0.85	0.85	1.25	1.40	1.60	1.70	1.85
27	0.85	0.90	1.25	1.40	1.60	1.70	1.85
28	0.85	0.90	1.25	1.40	1.60	1.70	1.85
29	0.90	0.95	1.25	1.40	1.60	1.70	1.85
30+	1.00	1.00	1.25	1.40	1.60	1.70	1.85

RIVERSOURCE LIFE INSURANCE COMPANY

Address: 227 Ameriprise Financial Center, Minneapolis MN 55474

Actuarial Memorandum for 30225 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	0.10	0.30	0.55	0.45	0.70	1.35	1.00	2.00
2	0.10	0.30	0.55	0.50	0.75	1.35	1.00	2.00
3	0.10	0.30	0.55	0.75	0.80	1.35	1.90	2.00
4	0.20	0.30	0.60	0.75	0.85	1.35	1.90	2.00
5	0.20	0.30	0.60	0.75	0.90	1.35	1.90	2.00
6	0.20	0.30	0.70	0.75	0.95	1.35	1.90	2.00
7	0.30	0.30	0.70	0.75	1.00	1.35	1.50	2.00
8	0.35	0.30	0.70	0.75	1.05	1.35	1.50	1.50
9	0.40	0.30	0.70	0.75	1.05	1.35	1.50	1.50
10	0.40	0.30	0.70	1.00	1.10	1.35	1.50	1.50
11	0.45	0.30	0.70	1.00	1.10	1.35	1.50	1.75
12	0.45	0.35	0.70	1.05	1.15	1.35	1.50	1.75
13	0.45	0.40	0.70	1.05	1.15	1.35	1.50	1.75
14	0.45	0.45	0.90	1.05	1.20	1.35	1.50	1.75
15	0.45	0.55	0.95	1.10	1.20	1.40	1.50	1.90
16	0.45	0.65	1.00	1.10	1.20	1.40	1.50	1.90
17	0.45	0.65	1.00	1.10	1.30	1.40	1.50	1.90
18	0.50	0.75	1.00	1.15	1.35	1.40	1.50	1.90
19	0.50	0.75	1.00	1.15	1.35	1.40	1.50	1.90
20	0.55	0.75	1.00	1.15	1.35	1.40	1.50	1.90
21	0.60	0.75	1.00	1.15	1.35	1.40	1.50	2.00
22	0.65	0.75	1.00	1.15	1.35	1.40	1.50	2.00
23	0.70	0.75	1.00	1.15	1.35	1.40	1.50	2.00
24	0.75	0.75	1.00	1.15	1.35	1.40	1.50	2.00
25	0.75	0.85	1.00	1.15	1.35	1.40	1.50	2.00
26	0.80	0.85	1.00	1.15	1.35	1.40	1.50	2.00
27	0.90	0.85	1.00	1.15	1.35	1.40	1.50	2.00
28	0.90	0.90	1.00	1.15	1.35	1.40	1.50	2.00
29	0.95	0.95	1.00	1.15	1.35	1.40	1.50	2.00
30	0.95	0.95	1.00	1.15	1.35	1.40	1.50	2.00
31	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
32	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
33	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
34	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
35+	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00

Morbidity used in the projections has also been reduced by 5% for anticipated improved claim experience from changes in claim management starting in 2003.

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 100.3%. This experience is based on 7,490 actual claims (4,047 lifetime and 3,743 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 30225, 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.

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.

<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 2012. 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 was used in the development of the current selection factors, subject to the constraints that the factors must be non-decreasing by duration and cannot exceed 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 23 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 36,342 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 1.3% of inforce policyholders is assumed to lapse, and a 0.7% 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 2012. 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 34,804 lapses, including 10,269 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 2.0% in the year of rate increase notification to policyholders grading down to 0% in the 3rd 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, 2011 and 2013 so that total commissions paid before and after 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 this particular policy form; 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 2007 rate increase filing, Exhibit VIII provides the

assumptions used in the 2009 rate increase filing and Exhibit IX provides the assumptions used in the 2011 rate increase filing.

6. Marketing Method

This policy form was marketed by agents of RiverSource Life.

7. Underwriting Description

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

8. Premiums

Premiums are unisex and payable for life. The premiums vary by issue age, the benefit limit, the initial daily benefit, the elimination period, and the Benefit Increase Option.

9. Issue Age Range

The issue ages are from 40 to 79 except for the benefit structure with 100-day elimination period, non-lifetime benefits, 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 9/30/2013) are applied to the annual premium (AP):

Premium Mode	Modal Factors	Percent Distribution
Annual	1.0000*AP + 0.0	42.8%
Semi-Annual	0.5020*AP+ 0.4	9.3%
Quarterly	0.2580*AP+ 0.5	8.5%
Monthly	0.0868*AP+ 0.6	39.4%

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 XII and XIII.

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 30225 is shown in Exhibit X, and Virginia experience for policy form 30225-VA is shown in Exhibit XI. Exhibit XII shows nationwide past experience including earned premiums, incurred claims, increase in active life reserves and incurred loss ratios by calendar year, and Exhibit XIII 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* on claims incurred at time *k* in year *j*

${}_j CR_{ValDate}^k$ = open claim reserve held on September 30, 2013 for claims incurred at time *k* in year *j*

${}_j IBNR_{ValDate}^k$ = incurred but not reported reserve as of September 30, 2013 attributable to claims incurred at time *k* in year *j*

EP_j = earned premium in year *j*

ValDate = September 30, 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 X through XIII 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 X through XIII 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 are as of September 30, 2013 and are calculated as the sum of accumulated historical experience and discounted future experience where accumulation and discounting of the total for each calendar year occur at 5.0%, an interest rate consistent with that assumed in the determination of premiums at the time of original pricing, and assume mid-year values.

The incurred loss ratio in Exhibits XII and XIII 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

Four prior increases have been approved and implemented on this form. A 35% increase was approved in October 2005 and implemented on each contract's next policy anniversary beginning in March 2006. A 15% increase was approved in May 2008 and implemented on each contract's next policy anniversary beginning in August 2008. A 15% increase was approved in May 2009 and implemented on each contract's next policy anniversary beginning in August 2009. A 15% increase was approved in May 2012 and implemented on each contract's next policy anniversary beginning in October 2012. The actual and projected premiums in Exhibits XI and XIII reflect the impact of these increases.

The actual and projected premiums in Exhibits X and XII reflect the accumulated rate increases as approved in Virginia and implemented from 2005 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 15%.

Projected experience assuming this increase is implemented is shown in Exhibits X and XI. As shown in these exhibits, the expected lifetime loss ratio with and without the requested rate increase exceeds the minimum loss ratio of 60%.

Current rate tables for this form are included with this memorandum in Exhibit 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 September 30, 2013 Inforce)

Before increase: $1,354
After increase: $1,556

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 9/30/2013 (based on inforce count)

By Issue Age:

Issue Ages	Percent Distribution
<55	31.0%
55-59	28.0%
60-64	23.3%
65-69	11.9%
70-74	4.7%
75-79	1.0%
>79	0.1%

By Elimination Period:

Elimination Period	Percent Distribution
20-day	19.4%
100-day	80.6%

By Benefit Period:

Benefit Period	Percent Distribution
2-Year	2.3%
3-Year	8.4%
4-Year	20.8%
Unlimited	68.5%

By Inflation Protection Option:

Inflation Option	Percent Distribution
None	14.1%
Simple	39.2%
Compound	46.7%

20. Number of Policyholders

As of 9/30/2013, 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	1,944	$2,631,609
Nationwide	46,237	$66,375,111

RIVERSOURCE LIFE INSURANCE COMPANY

Address: 227 Ameriprise Financial Center, Minneapolis MN 55474

Actuarial Memorandum for 30225 Series

February 2014

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 Form: 30225-VA

Original Pricing Assumptions

Mortality: 1983 Individual Annuitant Mortality Table

Lapse Rates:

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

Morbidity: Starting in 1989, RiverSource Life marketed nursing home policies with a zero day prior hospitalization requirement. Using the emerging experience on this business, statistics from the "1985 National Nursing Home Survey" published by the National Center for Health Statistics, and input provided from RiverSource Life's reinsurer, both the expected frequencies and expected severities of claims for the non-increasing benefit were developed. It should be noted that considerable judgment was made with regard to the frequency and severity of claims, especially for the Assisted Living Facility benefit. Claim costs for the Benefit Increase Options are based on these claim costs with the benefit loaded to reflect the scheduled increases in benefits.

The following selection factors were used:

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

Interest Rate: 5%

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

Policy Form: 30225-VA

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%	66%	71%	73%	88%
10	55%	66%	66%	74%	73%	88%
11	57%	67%	71%	78%	74%	88%
12	57%	67%	72%	78%	90%	89%
13	57%	67%	75%	83%	90%	92%
14	57%	68%	77%	89%	90%	95%
15	57%	69%	78%	90%	95%	98%
16	64%	69%	81%	90%	95%	100%
17	67%	69%	81%	91%	100%	100%
18	70%	70%	84%	95%	100%	100%
19	72%	70%	85%	96%	100%	100%
20	72%	73%	86%	97%	100%	100%
21	75%	75%	88%	100%	100%	100%
22	80%	77%	90%	100%	100%	100%
23	80%	80%	95%	100%	100%	100%
24	85%	82%	95%	100%	100%	100%
25	85%	85%	100%	100%	100%	100%
26	85%	90%	100%	100%	100%	100%
27	87%	90%	100%	100%	100%	100%
28	87%	95%	100%	100%	100%	100%
29	90%	95%	100%	100%	100%	100%
30	90%	100%	100%	100%	100%	100%
31	90%	100%	100%	100%	100%	100%
32	95%	100%	100%	100%	100%	100%
33	95%	100%	100%	100%	100%	100%
34	95%	100%	100%	100%	100%	100%
35+	100%	100%	100%	100%	100%	100%

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

Policy Form: 30225-VA

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%	1.2%	1.3%
11	0.8%	1.0%	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%	1.3%	1.8%
19	0.7%	1.3%	1.8%
20	0.8%	1.3%	1.9%
21	0.8%	1.3%	1.9%
22	0.8%	1.3%	2.0%
23	0.8%	1.3%	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 1.3% of inforce policyholders is assumed to lapse, and a 0.7% 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 Form: 30225-VA

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 2012. 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	0.05	0.40	1.00	0.90	1.00	1.00	1.85
2	0.10	0.45	1.00	0.95	1.00	2.40	1.85
3	0.15	0.45	1.00	1.40	1.50	2.40	1.85
4	0.20	0.45	1.00	1.40	2.00	2.15	1.85
5	0.25	0.55	1.00	1.40	2.00	2.15	1.85
6	0.30	0.55	1.00	1.40	2.00	2.00	1.85
7	0.35	0.55	1.00	1.40	2.00	2.00	1.85
8	0.40	0.55	1.00	1.40	2.00	1.70	1.85
9	0.45	0.60	1.00	1.40	1.75	1.75	1.85
10	0.45	0.65	1.00	1.40	1.60	1.75	1.85
11	0.45	0.65	1.00	1.40	1.60	1.85	1.85
12	0.55	0.65	1.00	1.40	1.60	1.70	1.85
13	0.55	0.65	1.00	1.40	1.60	1.70	1.85
14	0.55	0.65	1.00	1.40	1.60	1.70	1.85
15	0.65	0.70	1.10	1.40	1.60	1.70	1.85
16	0.65	0.70	1.15	1.40	1.60	1.70	1.85
17	0.65	0.70	1.15	1.40	1.60	1.70	1.85
18	0.70	0.70	1.15	1.40	1.60	1.70	1.85
19	0.70	0.70	1.15	1.40	1.60	1.70	1.85
20	0.75	0.75	1.15	1.40	1.60	1.70	1.85
21	0.75	0.75	1.20	1.40	1.60	1.70	1.85
22	0.75	0.75	1.20	1.40	1.60	1.70	1.85
23	0.75	0.80	1.20	1.40	1.60	1.70	1.85
24	0.80	0.80	1.25	1.40	1.60	1.70	1.85
25	0.80	0.85	1.25	1.40	1.60	1.70	1.85
26	0.85	0.85	1.25	1.40	1.60	1.70	1.85
27	0.85	0.90	1.25	1.40	1.60	1.70	1.85
28	0.85	0.90	1.25	1.40	1.60	1.70	1.85
29	0.90	0.95	1.25	1.40	1.60	1.70	1.85
30+	1.00	1.00	1.25	1.40	1.60	1.70	1.85

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

Policy Form: 30225-VA

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	0.10	0.30	0.55	0.45	0.70	1.35	1.00	2.00
2	0.10	0.30	0.55	0.50	0.75	1.35	1.00	2.00
3	0.10	0.30	0.55	0.75	0.80	1.35	1.90	2.00
4	0.20	0.30	0.60	0.75	0.85	1.35	1.90	2.00
5	0.20	0.30	0.60	0.75	0.90	1.35	1.90	2.00
6	0.20	0.30	0.70	0.75	0.95	1.35	1.90	2.00
7	0.30	0.30	0.70	0.75	1.00	1.35	1.50	2.00
8	0.35	0.30	0.70	0.75	1.05	1.35	1.50	1.50
9	0.40	0.30	0.70	0.75	1.05	1.35	1.50	1.50
10	0.40	0.30	0.70	1.00	1.10	1.35	1.50	1.50
11	0.45	0.30	0.70	1.00	1.10	1.35	1.50	1.75
12	0.45	0.35	0.70	1.05	1.15	1.35	1.50	1.75
13	0.45	0.40	0.70	1.05	1.15	1.35	1.50	1.75
14	0.45	0.45	0.90	1.05	1.20	1.35	1.50	1.75
15	0.45	0.55	0.95	1.10	1.20	1.40	1.50	1.90
16	0.45	0.65	1.00	1.10	1.20	1.40	1.50	1.90
17	0.45	0.65	1.00	1.10	1.30	1.40	1.50	1.90
18	0.50	0.75	1.00	1.15	1.35	1.40	1.50	1.90
19	0.50	0.75	1.00	1.15	1.35	1.40	1.50	1.90
20	0.55	0.75	1.00	1.15	1.35	1.40	1.50	1.90
21	0.60	0.75	1.00	1.15	1.35	1.40	1.50	2.00
22	0.65	0.75	1.00	1.15	1.35	1.40	1.50	2.00
23	0.70	0.75	1.00	1.15	1.35	1.40	1.50	2.00
24	0.75	0.75	1.00	1.15	1.35	1.40	1.50	2.00
25	0.75	0.85	1.00	1.15	1.35	1.40	1.50	2.00
26	0.80	0.85	1.00	1.15	1.35	1.40	1.50	2.00
27	0.90	0.85	1.00	1.15	1.35	1.40	1.50	2.00
28	0.90	0.90	1.00	1.15	1.35	1.40	1.50	2.00
29	0.95	0.95	1.00	1.15	1.35	1.40	1.50	2.00
30	0.95	0.95	1.00	1.15	1.35	1.40	1.50	2.00
31	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
32	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
33	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
34	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
35+	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00

The following adverse selection factors are used:

Year of Policyholder Notification *	Without Current Requested Increase	With Current Requested Increase
1	0.0%	2.0%
2	0.0%	1.0%
3	0.0%	0.0%

* For currently requested increase

Interest Rate: 5.0%

EXHIBIT II
RiverSource Life Insurance Company
Nationwide Nursing Home Claim Experience
For Policy Anniversaries through 2012
Policy Form: 30225
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	1,863,075	2,193,535	84.9%	1,467,066	1,973,522	74.3%	3,330,141	4,167,057	79.9%
2	4,856,478	3,960,658	122.6%	2,511,818	2,713,214	92.6%	7,368,296	6,673,872	110.4%
3	7,232,029	6,241,058	115.9%	4,966,626	4,508,353	110.2%	12,198,655	10,749,411	113.5%
4	11,955,778	8,652,100	138.2%	5,992,132	5,812,163	103.1%	17,947,910	14,464,263	124.1%
5	13,610,766	11,373,470	119.7%	7,378,120	7,379,805	100.0%	20,988,886	18,753,275	111.9%
6	11,973,449	14,274,994	83.9%	10,445,158	9,312,070	112.2%	22,418,607	23,587,064	95.0%
7	18,564,702	18,060,929	102.8%	11,007,279	10,762,635	102.3%	29,571,981	28,823,563	102.6%
8	18,564,278	19,665,901	94.4%	10,712,973	11,509,612	93.1%	29,277,251	31,175,513	93.9%
9	24,250,429	21,416,469	113.2%	12,495,019	12,237,030	102.1%	36,745,448	33,653,498	109.2%
10	25,548,818	23,318,750	109.6%	13,731,710	13,600,111	101.0%	39,280,528	36,918,861	106.4%
11	25,658,210	26,207,320	97.9%	15,881,133	14,454,135	109.9%	41,539,343	40,661,455	102.2%
12	30,969,905	28,764,316	107.7%	15,905,146	15,640,710	101.7%	46,875,051	44,405,026	105.6%
13	28,976,360	31,893,835	90.9%	15,424,893	16,517,540	93.4%	44,401,253	48,411,375	91.7%
14	37,741,406	34,965,703	107.9%	14,129,029	18,042,869	78.3%	51,870,436	53,008,573	97.9%
15	33,097,574	36,885,934	89.7%	18,664,928	18,428,122	101.3%	51,762,502	55,314,056	93.6%
16	31,814,279	33,059,957	96.2%	17,778,919	16,623,767	106.9%	49,593,198	49,683,723	99.8%
17	21,425,470	22,668,301	94.5%	10,711,841	11,518,752	93.0%	32,137,311	34,187,052	94.0%
18	12,458,247	13,431,216	92.8%	6,813,551	6,517,962	104.5%	19,271,797	19,949,178	96.6%
19	4,802,557	5,480,139	87.6%	3,010,230	2,530,808	118.9%	7,812,787	8,010,946	97.5%
20	0	3,524	0.0%	0	0	0.0%	0	3,524	0.0%
Total	**365,363,811**	**362,518,109**	**100.8%**	**199,027,571**	**200,083,179**	**99.5%**	**564,391,382**	**562,601,288**	**100.3%**

SPLIT BY ISSUE AGE				
Issue Age	Actual	Expected	A/E	Claim Count
<43	0	179,683	0.0%	0
43-47	1,204,571	1,017,788	118.4%	5
48-52	8,953,935	7,392,336	121.1%	77
53-57	26,140,224	26,345,248	99.2%	262
58-62	79,441,062	79,138,125	100.4%	871
63-67	131,886,980	131,807,276	100.1%	1,634
68-72	148,238,759	146,413,747	101.2%	2,046
73-77	113,321,954	114,828,509	98.7%	1,772
78-82	46,500,688	46,507,990	100.0%	911
83+	8,703,210	8,970,585	97.0%	212
Total	**564,391,382**	**562,601,288**	**100.3%**	**7,790**

EXHIBIT III
RiverSource Life Insurance Company
Long-Term Care Mortality Experience
For Policy Anniversaries in 2000 through Policy Anniversaries in 2012
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	2,157	2,175	99%	(18)
10	2,623	2,643	99%	(20)
11	3,087	3,058	101%	29
12	3,143	3,190	99%	(47)
13	3,099	3,107	100%	(8)
14	2,889	2,926	99%	(37)
15	2,644	2,685	98%	(41)
16	2,455	2,504	98%	(49)
17	2,079	2,093	99%	(14)
18	1,751	1,745	100%	6
19	1,430	1,432	100%	(2)
20	1,110	1,144	97%	(34)
21	854	851	100%	3
22	524	494	106%	30
23	90	80	113%	10
Total	**36,342**	**36,459**	**100%**	**(117)**

SUMMARY BY ISSUE AGE				
Issue Age	Actual Deaths	Expected Deaths	A/E	Difference
<43	22	21	105%	1
43-47	115	126	91%	(11)
48-52	853	852	100%	1
53-57	2,534	2,513	101%	21
58-62	5,821	5,831	100%	(10)
63-67	8,947	9,047	99%	(100)
68-72	9,019	9,023	100%	(4)
73-77	6,112	6,124	100%	(12)
78-82	2,545	2,552	100%	(7)
83+	374	372	101%	2
Total	**36,342**	**36,459**	**100%**	**(117)**

SUMMARY BY ALL DURATION / ISSUE AGE CELLS			
Actual Deaths	Expected Deaths	A/E	Difference
36,342	**36,459**	**100%**	**(117)**

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	2012	
< 10%	6.8%			0.9%	1.5%	1.7%	0.9%	1.2%	1.1%	1.2%
10% - 19.9%	13.6%	0.7%	2.1%	1.4%	1.7%	1.8%	1.4%	1.3%	1.2%	1.5%
20% - 29.9%	24.5%	1.8%	1.7%	1.2%	1.6%	2.5%		4.4%	2.6%	1.8%
30%+	25.5%	2.9%	2.7%	2.4%	2.8%	2.3%	1.4%	1.6%		2.6%
Total	16.4%	2.6%	2.5%	1.3%	1.8%	1.9%	1.4%	1.3%	1.2%	1.8%

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	2012	
< 10%	6.8%			0.3%	0.2%	0.2%	0.4%	0.3%	0.3%	0.2%
10% - 19.9%	13.6%	0.9%	0.8%	0.6%	0.6%	0.7%	0.5%	0.7%	0.6%	0.6%
20% - 29.9%	24.5%	1.8%	1.8%	1.9%	1.5%	2.7%		1.9%	1.1%	1.7%
30%+	25.5%	2.3%	2.1%	2.0%	1.9%	1.8%	1.4%	1.1%	1.9%	2.0%
Total	16.4%	1.4%	1.3%	0.8%	0.7%	0.8%	0.7%	0.9%	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 2012
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			
Duration	Lapses	Actual Exposure	Rate	Expected Lapses	Lapses	Actual Exposure	Rate	Expected Lapses	Lapses	Actual Exposure	Rate	Expected Lapses	Lapses	Actual Exposure	Rate	Expected 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	498	47,453	1.0%	1.1%	187	17,441	1.1%	1.1%	31	2,893	1.1%	1.3%	716	67,788	1.1%	1.1%
10	371	42,329	0.9%	0.8%	212	17,547	1.2%	1.2%	32	2,935	1.1%	1.3%	615	62,811	1.0%	1.0%
11	331	39,397	0.8%	0.8%	194	18,968	1.0%	1.0%	34	3,279	1.0%	1.4%	559	61,644	0.9%	0.9%
12	217	32,431	0.7%	0.7%	149	17,451	0.9%	0.9%	43	2,942	1.5%	1.5%	409	52,823	0.8%	0.8%
13	182	26,176	0.7%	0.7%	134	15,027	0.9%	0.9%	31	2,387	1.3%	1.5%	347	43,591	0.8%	0.8%
14	148	22,259	0.7%	0.7%	101	12,195	0.8%	0.9%	30	1,780	1.7%	1.6%	279	36,234	0.8%	0.8%
15	106	16,998	0.6%	0.7%	84	9,045	0.9%	0.9%	19	1,209	1.6%	1.6%	209	27,251	0.8%	0.8%
16	81	12,238	0.7%	0.7%	73	6,755	1.1%	1.0%	22	821	2.7%	1.7%	176	19,814	0.9%	0.8%
17	61	9,165	0.7%	0.7%	65	5,796	1.1%	1.1%	15	644	2.3%	1.7%	141	15,604	0.9%	0.9%
18	35	6,338	0.6%	0.7%	57	4,358	1.3%	1.3%	13	437	3.0%	1.8%	105	11,132	0.9%	0.9%
19	25	3,787	0.7%	0.7%	36	2,662	1.4%	1.3%	4	228	1.8%	1.8%	65	6,677	1.0%	0.9%
20	17	2,704	0.6%	0.8%	28	1,993	1.4%	1.3%	3	146	2.1%	1.9%	48	4,843	1.0%	1.0%
21	20	2,375	0.8%	0.8%	22	1,995	1.1%	1.3%	3	131	2.3%	1.9%	45	4,501	1.0%	1.0%
22	21	2,021	1.0%	0.8%	19	1,702	1.1%	1.3%	3	116	2.6%	2.0%	43	3,839	1.1%	1.0%
23	3	308	1.0%	0.8%	3	256	1.2%	1.3%	0	18	0.0%	2.0%	6	582	1.0%	0.0%
All Durations	**11,665**	**587,303**	**2.0%**	**2.0%**	**3,341**	**223,866**	**1.5%**	**1.5%**	**565**	**34,224**	**1.7%**	**1.6%**	**15,571**	**845,393**	**1.8%**	**1.8%**
Durations 8 and later	**2,666**	**316,892**	**0.8%**	**0.8%**	**1,559**	**150,543**	**1.0%**	**1.0%**	**321**	**22,837**	**1.4%**	**1.5%**	**4,546**	**490,271**	**0.9%**	**0.9%**

NON-LIFETIME BENEFIT PERIOD																
	Issue Ages 35-62				Issue Ages 63-72				Issue Ages 73+				All Issue Ages			
Duration	Lapses	Actual Exposure	Rate	Expected Lapses	Lapses	Actual Exposure	Rate	Expected Lapses	Lapses	Actual Exposure	Rate	Expected Lapses	Lapses	Actual Exposure	Rate	Expected 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	386	36,096	1.1%	1.2%	292	21,699	1.3%	1.3%	156	6,334	2.5%	2.7%	834	64,129	1.3%	1.4%
10	278	30,401	0.9%	1.0%	225	20,064	1.1%	1.3%	187	5,878	3.2%	3.4%	690	56,343	1.2%	1.3%
11	224	24,545	0.9%	1.0%	287	19,180	1.5%	1.5%	203	5,650	3.6%	3.9%	714	49,376	1.4%	1.5%
12	192	19,493	1.0%	0.9%	240	16,915	1.4%	1.5%	187	4,761	3.9%	4.0%	619	41,169	1.5%	1.5%
13	130	15,218	0.9%	0.8%	206	14,042	1.5%	1.5%	152	3,694	4.1%	4.4%	488	32,954	1.5%	1.5%
14	89	11,010	0.8%	0.8%	156	10,943	1.4%	1.5%	142	2,649	5.4%	4.8%	387	24,602	1.6%	1.5%
15	53	7,472	0.7%	0.7%	141	7,932	1.8%	1.6%	81	1,717	4.7%	4.9%	275	17,122	1.6%	1.6%
16	42	5,885	0.7%	0.7%	114	6,035	1.9%	1.8%	74	1,217	6.1%	5.4%	230	13,136	1.8%	1.7%
17	37	4,228	0.9%	0.8%	100	4,793	2.1%	2.0%	47	895	5.3%	5.4%	184	9,916	1.9%	1.8%
18	29	2,871	1.0%	0.8%	64	3,472	1.8%	2.2%	32	566	5.7%	5.4%	125	6,908	1.8%	1.9%
19	18	1,937	0.9%	0.9%	54	2,241	2.4%	2.4%	15	303	5.0%	5.4%	87	4,481	1.9%	2.0%
20	16	1,341	1.2%	0.9%	49	1,597	3.1%	2.6%	7	186	3.8%	5.4%	72	3,124	2.3%	2.0%
21	12	978	1.2%	0.9%	48	1,352	3.6%	2.8%	10	154	6.5%	5.4%	70	2,483	2.8%	2.2%
22	4	639	0.6%	0.9%	26	920	2.8%	3.0%	11	85	13.0%	5.4%	41	1,643	2.5%	2.3%
23	2	134	1.5%	1.0%	8	155	5.1%	3.2%	0	7	0.0%	5.4%	10	296	3.4%	0.0%
All Durations	**11,028**	**459,558**	**2.4%**	**2.4%**	**5,816**	**273,242**	**2.1%**	**2.1%**	**2,389**	**73,562**	**3.2%**	**3.3%**	**19,233**	**806,361**	**2.4%**	**2.4%**
Durations 8 and later	**1,943**	**199,135**	**1.0%**	**1.0%**	**2,326**	**153,346**	**1.5%**	**1.5%**	**1,454**	**40,688**	**3.6%**	**3.7%**	**5,723**	**393,169**	**1.5%**	**1.5%**

EXHIBIT VI
RiverSource Life Insurance Company
Prior 2004 Rate Increase Assumptions

Policy Form: 30225-VA

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 Form: 30225-VA

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 Form: 30225-VA

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	0.70	1.00	1.00	1.60	2.00	2.50
2	0.70	1.00	1.00	1.60	2.00	2.50
3	0.70	1.00	1.00	1.60	2.00	2.50
4	0.70	1.00	1.10	1.60	2.00	2.50
5	0.70	1.00	1.10	1.60	2.00	2.25
6	0.70	1.00	1.10	1.60	1.90	2.00
7	0.80	1.00	1.10	1.65	1.90	1.85
8	0.80	1.00	1.10	1.65	1.80	1.85
9	0.80	1.10	1.20	1.65	1.80	1.85
10	0.90	1.10	1.20	1.65	1.80	1.85
11	0.90	1.10	1.30	1.65	1.80	1.85
12	0.90	1.20	1.30	1.65	1.80	1.85
13	1.00	1.20	1.30	1.65	1.80	1.85
14	1.00	1.20	1.30	1.65	1.80	1.85
15	1.00	1.25	1.40	1.65	1.80	1.85
16	1.00	1.25	1.40	1.65	1.80	1.85
17	1.10	1.30	1.40	1.65	1.80	1.85
18	1.10	1.30	1.40	1.65	1.80	1.85
19	1.10	1.35	1.40	1.65	1.80	1.85
20	1.15	1.35	1.40	1.65	1.80	1.85
21	1.15	1.35	1.40	1.65	1.80	1.85
22	1.15	1.35	1.40	1.65	1.80	1.85
23	1.20	1.35	1.40	1.65	1.80	1.85
24	1.20	1.35	1.40	1.65	1.80	1.85
25+	1.20	1.35	1.40	1.65	1.80	1.85

EXHIBIT VI
RiverSource Life Insurance Company
Prior 2004 Rate Increase Assumptions

Policy Form: 30225-VA

Prior 2004 Rate Increase Filing Assumptions (cont):

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	0.50	0.50	0.70	0.80	1.60	1.80	1.85
2	0.50	0.60	0.70	0.80	1.60	1.80	1.85
3	0.50	0.70	0.70	0.80	1.60	1.80	1.85
4	0.60	0.70	0.70	0.90	1.50	1.80	1.90
5	0.60	0.70	0.70	0.90	1.50	1.70	1.90
6	0.60	0.70	0.70	0.90	1.50	1.70	1.90
7	0.70	0.70	0.70	1.00	1.40	1.65	1.95
8	0.70	0.70	0.80	1.00	1.40	1.65	1.95
9	0.70	0.70	0.80	1.00	1.40	1.65	1.95
10	0.70	0.80	0.80	1.10	1.40	1.65	1.95
11	0.70	0.80	0.80	1.10	1.40	1.65	1.95
12	0.80	0.80	0.80	1.10	1.40	1.65	1.95
13	0.80	0.80	0.80	1.10	1.45	1.65	1.95
14	0.80	0.80	0.90	1.20	1.45	1.65	1.95
15	0.80	0.80	0.90	1.20	1.45	1.65	1.95
16	0.80	0.80	0.90	1.20	1.45	1.65	1.95
17	0.80	0.90	1.00	1.30	1.45	1.65	1.95
18	0.80	0.90	1.00	1.30	1.45	1.65	1.95
19	0.80	0.90	1.00	1.30	1.45	1.65	1.95
20	0.80	0.90	1.10	1.30	1.45	1.65	1.95
21	0.80	0.90	1.10	1.30	1.45	1.65	1.95
22	0.90	0.90	1.10	1.30	1.45	1.65	1.95
23	0.90	1.00	1.10	1.30	1.45	1.65	1.95
24	0.90	1.00	1.10	1.30	1.45	1.65	1.95
25	0.90	1.00	1.10	1.30	1.45	1.65	1.95
26	0.90	1.00	1.10	1.30	1.45	1.65	1.95
27+	1.00	1.00	1.10	1.30	1.45	1.65	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: 5.0%

EXHIBIT VII
RiverSource Life Insurance Company
Prior 2007 Rate Increase Assumptions

Policy Form: 30225-VA

Prior 2007 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 2007 Rate Increase Assumptions

Policy Form: 30225-VA

Prior 2007 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 2007 Rate Increase Assumptions

Policy Form: 30225-VA

Prior 2007 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	0.70	0.70	0.90	1.00	1.50	2.00	2.50
2	0.70	0.70	0.90	1.00	1.50	2.00	2.50
3	0.70	0.70	0.90	1.00	1.50	2.00	2.50
4	0.70	0.70	0.90	1.10	1.50	2.00	2.50
5	0.70	0.70	0.90	1.10	1.60	2.00	2.25
6	0.70	0.70	0.90	1.10	1.60	1.90	2.00
7	0.80	0.80	0.90	1.10	1.60	1.90	1.80
8	0.80	0.80	0.90	1.10	1.60	1.80	1.80
9	0.80	0.80	1.00	1.20	1.60	1.80	1.80
10	0.80	0.80	1.00	1.30	1.60	1.80	1.80
11	0.80	0.80	1.00	1.45	1.60	1.80	1.80
12	0.80	0.80	1.10	1.45	1.60	1.80	1.80
13	0.80	0.90	1.20	1.45	1.60	1.80	1.80
14	0.80	1.00	1.20	1.45	1.60	1.80	1.80
15	0.80	1.00	1.25	1.45	1.60	1.80	1.80
16	0.80	1.00	1.25	1.45	1.60	1.80	1.80
17	0.80	1.10	1.30	1.45	1.60	1.80	1.80
18	0.90	1.10	1.30	1.45	1.60	1.80	1.80
19	1.00	1.10	1.35	1.45	1.60	1.80	1.80
20	1.00	1.15	1.35	1.45	1.60	1.80	1.80
21	1.00	1.15	1.35	1.45	1.60	1.80	1.80
22	1.10	1.15	1.35	1.45	1.60	1.80	1.80
23	1.10	1.20	1.35	1.45	1.60	1.80	1.80
24	1.10	1.20	1.35	1.45	1.60	1.80	1.80
25	1.15	1.20	1.35	1.45	1.60	1.80	1.80
26	1.15	1.20	1.35	1.45	1.60	1.80	1.80
27	1.15	1.20	1.35	1.45	1.60	1.80	1.80
28+	1.20	1.20	1.35	1.45	1.60	1.80	1.80

EXHIBIT VII
RiverSource Life Insurance Company
Prior 2007 Rate Increase Assumptions

Policy Form: 30225-VA

Prior 2007 Rate Increase Filing Assumptions (cont):

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	0.50	0.50	0.50	0.70	0.75	1.60	1.80	1.85
2	0.50	0.50	0.60	0.70	0.75	1.60	1.80	1.85
3	0.50	0.50	0.70	0.70	0.75	1.60	1.80	1.85
4	0.50	0.50	0.70	0.70	0.90	1.50	1.80	1.90
5	0.60	0.60	0.70	0.70	0.90	1.50	1.70	1.90
6	0.60	0.60	0.70	0.70	0.90	1.50	1.70	1.90
7	0.60	0.60	0.70	0.70	1.10	1.35	1.50	1.95
8	0.70	0.70	0.70	0.75	1.10	1.35	1.50	1.95
9	0.70	0.70	0.70	0.80	1.10	1.35	1.50	1.95
10	0.70	0.70	0.80	0.90	1.20	1.35	1.50	1.95
11	0.70	0.70	0.80	0.90	1.20	1.35	1.50	1.95
12	0.70	0.70	0.80	0.90	1.20	1.35	1.50	1.95
13	0.70	0.70	0.80	0.90	1.20	1.35	1.50	1.95
14	0.70	0.70	0.80	0.90	1.20	1.35	1.50	1.95
15	0.70	0.80	0.80	0.90	1.20	1.35	1.50	1.95
16	0.70	0.80	0.80	0.90	1.20	1.35	1.50	1.95
17	0.70	0.80	0.90	1.00	1.30	1.35	1.50	1.95
18	0.70	0.80	0.90	1.00	1.30	1.35	1.50	1.95
19	0.70	0.80	0.90	1.00	1.30	1.35	1.50	1.95
20	0.80	0.80	0.90	1.10	1.30	1.35	1.50	1.95
21	0.80	0.80	0.90	1.10	1.30	1.35	1.50	1.95
22	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
23	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
24	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
25	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
26	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
27	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
28	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
29	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
30	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
31+	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.95

An additional 2.5% of inforce policyholders is 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 is also assumed.

Interest Rate: 5.0%

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2009 Rate Increase Assumptions

Policy Forms: 30225-VA

Prior 2009 Rate Increase Filing Assumptions:

Mortality: 1983 Individual Annuitant Mortality Basic Table with selection.

Mortality Selection Factors

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

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2009 Rate Increase Assumptions

Policy Forms: 30225-VA

Prior 2009 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	1.5%	1.7%	1.3%
7	1.3%	1.1%	1.3%
8	0.9%	1.1%	1.3%
9	0.9%	1.1%	1.3%
10	0.8%	1.0%	1.3%
11	0.7%	0.9%	1.4%
12	0.7%	0.9%	1.4%
13	0.7%	0.9%	1.5%
14	0.7%	0.9%	1.5%
15	0.7%	0.9%	1.5%
16	0.8%	0.9%	1.5%
17	0.8%	1.0%	1.5%
18	0.8%	1.1%	1.5%
19	0.8%	1.1%	1.5%
20	0.8%	1.1%	1.5%
21	0.9%	1.3%	1.5%
22	0.9%	1.3%	1.5%
23	0.9%	1.3%	1.5%
24	0.9%	1.3%	1.5%
25	0.9%	1.3%	1.5%
26	0.9%	1.3%	1.5%
27	1.0%	1.3%	1.5%
28	1.0%	1.3%	1.5%
29	1.0%	1.3%	1.5%
30	1.0%	1.3%	1.5%
31	1.1%	1.3%	1.5%
32	1.1%	1.3%	1.5%
33	1.1%	1.3%	1.5%
34	1.1%	1.3%	1.5%
35	1.1%	1.3%	1.5%
36+	1.1%	1.3%	1.5%

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%	2.6%
8	1.2%	1.3%	2.8%
9	1.2%	1.3%	3.0%
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%	4.3%
14	0.8%	1.5%	4.4%
15	0.8%	1.6%	4.6%
16	0.8%	1.8%	4.8%
17	0.8%	2.0%	5.0%
18	0.8%	2.6%	5.0%
19	0.9%	2.8%	5.0%
20	0.9%	3.0%	5.0%
21	0.9%	3.5%	5.0%
22	0.9%	3.7%	5.0%
23	1.0%	3.8%	5.0%
24	1.2%	3.9%	5.0%
25	1.4%	4.0%	5.0%
26	1.5%	4.0%	5.0%
27	1.6%	4.0%	5.0%
28	2.1%	4.0%	5.0%
29	2.4%	4.0%	5.0%
30	2.6%	4.0%	5.0%
31	2.9%	4.0%	5.0%
32	3.1%	4.0%	5.0%
33	3.2%	4.0%	5.0%
34	3.3%	4.0%	5.0%
35	3.4%	4.0%	5.0%
36+	3.5%	4.0%	5.0%

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

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2009 Rate Increase Assumptions

Policy Forms: 30225-VA

Prior 2009 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 2007.

Lifetime Benefit Actual-to-Expected Adjustment Factors

	Issue Age Band						
Duration	<53	53-57	58-62	63-67	68-72	73-77	78+
1	0.40	0.40	1.00	1.00	1.50	2.00	2.50
2	0.40	0.40	1.00	1.00	1.50	2.10	2.50
3	0.40	0.40	1.00	1.00	1.50	2.10	2.50
4	0.40	0.40	1.00	1.25	1.70	2.10	2.50
5	0.40	0.40	1.00	1.25	1.70	2.10	2.25
6	0.40	0.40	0.90	1.25	1.70	1.90	2.25
7	0.40	0.50	0.90	1.25	1.70	1.90	1.80
8	0.40	0.50	0.90	1.25	1.70	1.80	1.80
9	0.40	0.50	0.90	1.25	1.55	1.80	1.80
10	0.40	0.60	0.90	1.35	1.55	1.80	1.80
11	0.40	0.60	0.90	1.45	1.55	1.80	1.80
12	0.50	0.60	1.00	1.45	1.55	1.75	1.80
13	0.50	0.70	1.10	1.45	1.55	1.75	1.80
14	0.50	0.80	1.10	1.45	1.55	1.75	1.80
15	0.60	0.90	1.25	1.45	1.55	1.75	1.80
16	0.60	0.90	1.25	1.45	1.55	1.75	1.80
17	0.60	1.00	1.30	1.45	1.55	1.75	1.80
18	0.60	1.10	1.30	1.45	1.55	1.75	1.80
19	0.70	1.10	1.35	1.45	1.55	1.75	1.80
20	0.80	1.15	1.35	1.45	1.55	1.75	1.80
21	0.80	1.15	1.35	1.45	1.55	1.75	1.80
22	0.80	1.15	1.35	1.45	1.55	1.75	1.80
23	1.00	1.20	1.35	1.45	1.55	1.75	1.80
24	1.10	1.20	1.35	1.45	1.55	1.75	1.80
25	1.10	1.20	1.35	1.45	1.55	1.75	1.80
26	1.15	1.20	1.35	1.45	1.55	1.75	1.80
27	1.15	1.20	1.35	1.45	1.55	1.75	1.80
28	1.15	1.20	1.35	1.45	1.55	1.75	1.80
29+	1.20	1.20	1.35	1.45	1.55	1.75	1.80

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2009 Rate Increase Assumptions

Policy Forms: 30225-VA

Prior 2009 Rate Increase Filing Assumptions (cont):

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	0.30	0.30	0.50	0.70	0.70	1.60	1.80	1.85
2	0.30	0.30	0.50	0.70	0.70	1.60	1.80	1.85
3	0.30	0.30	0.70	0.75	0.75	1.50	1.80	1.85
4	0.30	0.30	0.70	0.75	0.75	1.50	1.80	1.90
5	0.40	0.40	0.70	0.75	0.75	1.50	1.80	1.90
6	0.40	0.40	0.70	0.75	0.75	1.50	1.80	1.90
7	0.40	0.40	0.70	0.75	1.10	1.35	1.50	1.95
8	0.40	0.40	0.70	0.75	1.10	1.35	1.50	1.95
9	0.40	0.40	0.70	0.80	1.10	1.35	1.50	1.95
10	0.40	0.40	0.70	1.00	1.20	1.35	1.50	1.95
11	0.40	0.40	0.70	1.00	1.20	1.35	1.50	1.95
12	0.40	0.40	0.70	1.10	1.20	1.35	1.50	1.95
13	0.40	0.50	0.70	1.10	1.20	1.35	1.50	1.95
14	0.40	0.50	0.80	1.10	1.20	1.35	1.50	1.95
15	0.40	0.55	0.80	1.10	1.20	1.35	1.50	1.95
16	0.40	0.60	0.80	1.10	1.20	1.35	1.50	1.95
17	0.40	0.65	0.90	1.10	1.30	1.35	1.50	1.95
18	0.50	0.70	0.90	1.10	1.30	1.35	1.50	1.95
19	0.50	0.80	0.90	1.10	1.30	1.35	1.50	1.95
20	0.55	0.80	0.90	1.10	1.30	1.35	1.50	1.95
21	0.60	0.80	1.00	1.10	1.30	1.35	1.50	1.95
22	0.65	0.90	1.00	1.10	1.30	1.35	1.50	1.95
23	0.70	0.90	1.00	1.10	1.30	1.35	1.50	1.95
24	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
25	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
26	0.80	1.00	1.00	1.10	1.30	1.35	1.50	1.95
27	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
28	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
29	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
30	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
31+	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.95

The following adverse selection factors are used, which includes some anti-selection from prior increases:

Calendar Year	Without Current Requested Increase	With Current Requested Increase
2008	4.0%	4.0%
2009	3.0%	4.0%
2010	2.0%	4.0%
2011	1.5%	3.0%
2012	1.0%	2.0%
2013	1.0%	1.0%
2014+	0.0%	0.0%

Interest Rate: 5.0%

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Forms: 30225-VA

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 Forms: 30225-VA

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 Forms: 30225-VA

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	0.40	0.40	0.40	1.00	1.00	1.00	1.00	2.50
2	0.32	0.40	0.40	1.00	1.00	1.00	2.40	2.50
3	0.27	0.40	0.40	1.60	1.60	1.50	2.40	2.40
4	0.23	0.40	0.40	1.60	1.60	2.00	2.15	2.40
5	0.20	0.40	0.50	1.60	1.10	2.00	2.15	2.40
6	0.18	0.40	0.50	1.00	1.10	2.00	2.00	2.40
7	0.20	0.40	0.50	1.00	1.10	2.00	2.00	1.90
8	0.24	0.40	0.50	1.00	1.40	2.00	1.70	1.90
9	0.28	0.40	0.50	1.00	1.40	1.75	1.70	1.90
10	0.32	0.40	0.60	0.85	1.40	1.60	1.70	1.90
11	0.36	0.40	0.60	0.75	1.45	1.60	1.80	1.90
12	0.40	0.50	0.60	0.80	1.50	1.60	1.65	1.90
13	0.40	0.50	0.60	0.95	1.50	1.60	1.65	1.90
14	0.40	0.50	0.65	0.95	1.50	1.60	1.65	1.90
15	0.40	0.60	0.70	1.05	1.50	1.60	1.65	1.90
16	0.40	0.60	0.80	1.10	1.50	1.60	1.65	1.90
17	0.50	0.60	0.80	1.15	1.50	1.60	1.65	1.90
18	0.50	0.60	0.90	1.15	1.50	1.60	1.65	1.90
19	0.50	0.65	0.95	1.20	1.50	1.60	1.65	1.90
20	0.60	0.70	0.95	1.25	1.50	1.60	1.65	1.90
21	0.60	0.80	1.00	1.25	1.50	1.60	1.65	1.90
22	0.60	0.80	1.00	1.30	1.50	1.60	1.65	1.90
23	0.60	0.90	1.05	1.30	1.50	1.60	1.65	1.90
24	0.65	0.95	1.05	1.30	1.50	1.60	1.65	1.90
25	0.70	0.95	1.10	1.30	1.50	1.60	1.65	1.90
26	0.80	1.00	1.10	1.30	1.50	1.60	1.65	1.90
27	0.80	1.00	1.15	1.30	1.50	1.60	1.65	1.90
28	0.90	1.05	1.15	1.30	1.50	1.60	1.65	1.90
29	0.95	1.05	1.15	1.30	1.50	1.60	1.65	1.90
30	0.95	1.10	1.15	1.30	1.50	1.60	1.65	1.90
31	1.00	1.10	1.15	1.30	1.50	1.60	1.65	1.90
32	1.00	1.10	1.15	1.30	1.50	1.60	1.65	1.90
33	1.05	1.10	1.15	1.30	1.50	1.60	1.65	1.90
34	1.05	1.10	1.15	1.30	1.50	1.60	1.65	1.90
35+	1.10	1.10	1.15	1.30	1.50	1.60	1.65	1.90

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Forms: 30225-VA

Prior 2011 Rate Increase Filing Assumptions (cont):

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	0.30	0.30	0.30	0.40	0.50	0.50	1.60	1.00	2.00
2	0.24	0.30	0.30	0.40	0.50	0.50	1.60	1.00	2.00
3	0.20	0.30	0.30	0.55	0.75	0.80	1.50	1.90	2.00
4	0.17	0.30	0.30	0.55	0.75	0.80	1.50	1.90	2.00
5	0.15	0.35	0.35	0.55	0.75	0.80	1.50	1.90	2.00
6	0.13	0.35	0.35	0.55	0.75	0.80	1.50	1.90	2.00
7	0.15	0.35	0.35	0.55	0.75	1.05	1.35	1.50	2.00
8	0.18	0.35	0.35	0.55	0.75	1.05	1.35	1.50	1.50
9	0.21	0.35	0.35	0.55	0.75	1.05	1.35	1.50	1.50
10	0.28	0.35	0.35	0.70	1.00	1.05	1.35	1.50	1.50
11	0.32	0.40	0.40	0.70	1.00	1.15	1.35	1.50	1.75
12	0.35	0.40	0.40	0.70	1.05	1.20	1.35	1.50	1.75
13	0.35	0.40	0.50	0.70	1.05	1.20	1.35	1.50	1.75
14	0.35	0.40	0.50	0.90	1.05	1.20	1.35	1.50	1.75
15	0.35	0.40	0.55	0.90	1.05	1.30	1.35	1.50	1.75
16	0.40	0.40	0.60	0.90	1.05	1.30	1.35	1.50	1.75
17	0.40	0.40	0.65	0.90	1.05	1.30	1.35	1.50	1.75
18	0.40	0.50	0.70	0.90	1.05	1.30	1.35	1.50	1.75
19	0.40	0.50	0.75	0.90	1.10	1.30	1.35	1.50	1.75
20	0.40	0.55	0.75	0.90	1.10	1.30	1.35	1.50	1.75
21	0.40	0.60	0.75	1.00	1.10	1.30	1.35	1.50	1.75
22	0.40	0.65	0.85	1.00	1.10	1.30	1.35	1.50	1.75
23	0.50	0.70	0.85	1.00	1.10	1.30	1.35	1.50	1.75
24	0.50	0.75	0.85	1.00	1.10	1.30	1.35	1.50	1.75
25	0.55	0.75	0.90	1.00	1.10	1.30	1.35	1.50	1.75
26	0.60	0.80	0.95	1.00	1.10	1.30	1.35	1.50	1.75
27	0.65	0.85	0.95	1.00	1.10	1.30	1.35	1.50	1.75
28	0.70	0.85	1.00	1.00	1.10	1.30	1.35	1.50	1.75
29	0.75	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.75
30	0.75	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.75
31	0.80	0.95	1.00	1.00	1.10	1.30	1.35	1.50	1.75
32	0.85	0.95	1.00	1.00	1.10	1.30	1.35	1.50	1.75
33	0.85	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
34	0.90	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
35	0.90	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
36	0.95	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
37	0.95	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
38+	1.00	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75

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: 5.0%

EXHIBIT X
RiverSource Life Insurance Company
Nationwide Experience Projections with No Increase
Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis
Policy Form: 30225

			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
	1992	8	145	0	0	0.0%	0.0%	409	0	0	0.0%	0.0%	5.00%	2.8202
	1993	8,609	2,687,161	13,547	147,465	0.5%	5.5%	7,217,338	36,384	396,071	0.5%	5.5%	5.00%	2.6859
	1994	22,300	12,916,809	161,852	1,546,420	1.3%	12.0%	33,040,700	414,010	3,955,682	1.3%	12.0%	5.00%	2.5580
	1995	39,388	26,751,336	524,580	3,369,053	2.0%	12.6%	65,170,369	1,277,959	8,207,531	2.0%	12.6%	5.00%	2.4362
	1996	61,189	42,758,453	1,649,792	6,593,399	3.9%	15.4%	99,205,876	3,827,760	15,297,652	3.9%	15.4%	5.00%	2.3201
	1997	74,032	58,783,795	3,090,519	7,424,220	5.3%	12.6%	129,892,397	6,829,006	16,405,027	5.3%	12.6%	5.00%	2.2097
	1998	77,314	67,697,736	4,844,252	13,305,497	7.2%	19.7%	142,465,910	10,194,443	28,000,638	7.2%	19.7%	5.00%	2.1044
Historical	1999	74,116	66,592,712	7,367,115	18,669,759	11.1%	28.0%	133,467,097	14,765,391	37,418,487	11.1%	28.0%	5.00%	2.0042
Experience	2000	71,332	63,713,697	10,763,930	19,274,006	16.9%	30.3%	121,616,084	20,546,085	36,790,035	16.9%	30.3%	5.00%	1.9088
	2001	69,192	61,140,894	14,405,241	23,482,824	23.6%	38.4%	111,147,755	26,187,223	42,689,320	23.6%	38.4%	5.00%	1.8179
	2002	67,285	58,984,823	18,680,647	31,882,410	31.7%	54.1%	102,122,138	32,342,347	55,198,942	31.7%	54.1%	5.00%	1.7313
	2003	65,504	56,853,917	23,278,895	35,876,618	40.9%	63.1%	93,745,559	38,384,216	59,156,411	40.9%	63.1%	5.00%	1.6489
	2004	63,859	55,057,979	27,534,536	33,373,239	50.0%	60.6%	86,461,205	43,239,312	52,408,215	50.0%	60.6%	5.00%	1.5704
	2005	61,372	50,157,191	31,341,086	29,998,753	62.5%	59.8%	75,014,448	46,873,324	44,865,749	62.5%	59.8%	5.00%	1.4956
	2006	59,452	52,775,548	33,562,912	39,771,059	63.6%	75.4%	75,171,838	47,805,961	56,648,651	63.6%	75.4%	5.00%	1.4244
	2007	57,749	60,977,339	37,427,898	44,353,590	61.4%	72.7%	82,718,298	50,772,501	60,167,491	61.4%	72.7%	5.00%	1.3565
	2008	55,636	59,305,602	42,350,250	46,598,165	71.4%	78.6%	76,619,540	54,714,167	60,202,237	71.4%	78.6%	5.00%	1.2919
	2009	53,387	63,016,024	47,512,751	52,752,330	75.4%	83.7%	77,536,379	58,460,793	64,907,692	75.4%	83.7%	5.00%	1.2304
	2010	51,455	67,630,762	52,103,000	49,544,460	77.0%	73.3%	79,251,867	61,055,944	58,057,766	77.0%	73.3%	5.00%	1.1718
	2011	49,498	65,407,470	55,618,997	66,353,503	85.0%	101.4%	72,996,707	62,072,477	74,052,509	85.0%	101.4%	5.00%	1.1160
	2012	47,526	62,193,076	63,058,486	67,431,878	101.4%	108.4%	66,104,140	67,023,973	71,672,389	101.4%	108.4%	5.00%	1.0629
	1/2013-9/2013	46,237	48,200,249	50,781,323	56,489,129	105.4%	117.2%	49,090,252	51,718,986	57,532,184	105.4%	117.2%	5.00%	1.0185
	10/2013-12/2013	45,551	16,542,560	19,923,980	19,587,615	120.4%	118.4%	16,441,978	19,802,838	19,468,518	120.4%	118.4%	5.00%	0.9939
	2014	43,531	63,736,937	65,741,683	81,620,569	103.1%	128.1%	61,446,792	63,379,505	78,687,844	103.1%	128.1%	5.00%	0.9641
	2015	41,471	59,833,032	72,356,220	86,971,390	120.9%	145.4%	54,936,342	66,434,642	79,853,718	120.9%	145.4%	5.00%	0.9182
	2016	39,372	55,965,249	83,613,661	93,017,872	149.4%	166.2%	48,938,186	73,115,030	81,338,438	149.4%	166.2%	5.00%	0.8744
	2017	37,236	52,143,126	93,516,911	99,381,830	179.3%	190.6%	43,424,737	77,880,778	82,765,076	179.3%	190.6%	5.00%	0.8328
	2018	35,066	48,373,764	100,746,191	105,693,175	208.3%	218.5%	38,367,253	79,906,013	83,829,673	208.3%	218.5%	5.00%	0.7931
Projected	2019	32,874	44,672,323	107,144,249	111,996,443	239.8%	250.7%	33,744,273	80,933,886	84,599,104	239.8%	250.7%	5.00%	0.7554
Future	2020	30,670	41,056,122	113,850,322	118,232,043	277.3%	288.0%	29,535,897	81,904,260	85,056,484	277.3%	288.0%	5.00%	0.7194
Experience	2021	28,468	37,541,204	120,651,331	124,256,135	321.4%	331.0%	25,721,194	82,663,740	85,133,556	321.4%	331.0%	5.00%	0.6851
	2022	26,284	34,149,017	127,313,089	130,031,603	372.8%	380.8%	22,282,906	83,074,300	84,848,183	372.8%	380.8%	5.00%	0.6525
	2023	24,133	30,899,000	133,756,104	135,781,218	432.9%	439.4%	19,202,101	83,122,375	84,380,877	432.9%	439.4%	5.00%	0.6214
	2024	22,026	27,803,405	139,973,930	141,405,560	503.4%	508.6%	16,455,574	82,844,216	83,691,533	503.4%	508.6%	5.00%	0.5919
	2025	19,976	24,870,789	145,938,450	146,500,077	586.8%	589.0%	14,018,944	82,261,280	82,577,853	586.8%	589.0%	5.00%	0.5637
	2026	18,000	22,112,024	151,632,991	150,869,986	685.7%	682.3%	11,870,389	81,401,075	80,991,471	685.7%	682.3%	5.00%	0.5368
	2027	16,113	19,537,901	157,128,894	153,887,047	804.2%	787.6%	9,989,070	80,334,703	78,677,256	804.2%	787.6%	5.00%	0.5113
	2028	14,321	17,152,529	161,856,951	154,557,764	943.6%	901.1%	8,351,914	78,811,427	75,257,306	943.6%	901.1%	5.00%	0.4869
	2029	12,638	14,958,233	165,232,086	153,056,223	1104.6%	1023.2%	6,936,635	76,623,666	70,977,309	1104.6%	1023.2%	5.00%	0.4637
	2030	11,071	12,957,221	167,029,785	150,021,325	1289.1%	1157.8%	5,722,570	73,768,875	66,257,071	1289.1%	1157.8%	5.00%	0.4417
	2031	9,623	11,145,521	167,232,093	145,741,393	1500.4%	1307.6%	4,688,029	70,341,166	61,301,748	1500.4%	1307.6%	5.00%	0.4206
	2032	8,298	9,516,626	165,879,295	140,229,509	1743.0%	1473.5%	3,812,270	66,449,669	56,174,609	1743.0%	1473.5%	5.00%	0.4006
	2033	7,100	8,066,640	163,022,693	133,560,110	2020.9%	1655.7%	3,077,542	62,195,563	50,955,153	2020.9%	1655.7%	5.00%	0.3815
	2034	6,030	6,789,168	158,721,962	125,799,436	2337.9%	1852.9%	2,466,827	57,671,210	45,708,897	2337.9%	1852.9%	5.00%	0.3633
	2035	5,080	5,673,038	153,052,105	117,127,605	2697.9%	2064.6%	1,963,127	52,962,936	40,531,437	2697.9%	2064.6%	5.00%	0.3460
	2036	4,245	4,705,434	146,124,913	107,719,264	3105.5%	2289.3%	1,550,755	48,157,919	35,500,693	3105.5%	2289.3%	5.00%	0.3296
	2037	3,518	3,873,252	138,080,514	97,804,641	3565.0%	2525.1%	1,215,710	43,339,764	30,698,249	3565.0%	2525.1%	5.00%	0.3139
	2038	2,891	3,163,404	129,110,955	87,724,740	4081.4%	2773.1%	945,626	38,594,724	26,223,276	4081.4%	2773.1%	5.00%	0.2989
	2039	2,354	2,563,020	119,450,861	77,745,166	4660.6%	3033.3%	729,672	34,006,727	22,133,441	4660.6%	3033.3%	5.00%	0.2847
	2040	1,900	2,059,622	109,352,862	68,107,017	5309.4%	3306.8%	558,437	29,649,434	18,466,225	5309.4%	3306.8%	5.00%	0.2711
	2041	1,520	1,641,280	99,067,478	59,009,504	6036.0%	3595.3%	423,818	25,581,621	15,237,682	6036.0%	3595.3%	5.00%	0.2582
	2042	1,204	1,296,749	88,834,681	50,619,947	6850.6%	3903.6%	318,907	21,846,919	12,448,853	6850.6%	3903.6%	5.00%	0.2459
	2043	945	1,015,587	78,871,084	43,025,102	7766.1%	4236.5%	237,868	18,472,946	10,077,209	7766.1%	4236.5%	5.00%	0.2342
	2044	735	788,256	69,354,317	36,231,175	8798.5%	4596.4%	175,831	15,470,436	8,081,863	8798.5%	4596.4%	5.00%	0.2231
	2045	565	606,168	60,415,508	30,209,050	9966.8%	4983.6%	128,775	12,834,773	6,417,662	9966.8%	4983.6%	5.00%	0.2124
	2046	430	461,704	52,139,533	24,911,670	11292.8%	5395.6%	93,414	10,549,153	5,040,264	11292.8%	5395.6%	5.00%	0.2023
	2047	324	348,200	44,572,807	20,288,249	12800.9%	5826.6%	67,095	8,588,773	3,909,361	12800.9%	5826.6%	5.00%	0.1927
	2048	241	259,907	37,732,884	16,295,083	14517.8%	6269.6%	47,697	6,924,555	2,990,394	14517.8%	6269.6%	5.00%	0.1835
	2049	178	191,931	31,618,088	12,893,977	16473.7%	6718.0%	33,545	5,526,093	2,253,562	16473.7%	6718.0%	5.00%	0.1748
	2050	129	140,155	26,213,821	10,047,797	18703.4%	7169.1%	23,329	4,363,386	1,672,492	18703.4%	7169.1%	5.00%	0.1665
	2051	93	101,157	21,494,450	7,709,181	21248.6%	7621.0%	16,036	3,407,456	1,222,115	21248.6%	7621.0%	5.00%	0.1585
	2052	66	72,123	17,426,624	5,833,777	24162.5%	8088.7%	10,889	2,631,043	880,774	24162.5%	8088.7%	5.00%	0.1510
	Past		1,103,602,716	526,071,609	648,237,776	47.7%	58.7%	1,780,056,306	698,542,262	904,030,678	39.2%	50.8%		
	Future		688,783,378	4,205,176,353	3,575,501,269	610.5%	519.1%	489,971,952	1,987,828,876	1,846,317,226	405.7%	376.8%		
	Lifetime		1,792,386,094	4,731,247,962	4,223,739,045	264.0%	235.6%	2,270,028,259	2,686,371,138	2,750,347,905	118.3%	121.2%		

EXHIBIT X
RiverSource Life Insurance Company
Nationwide Experience Projections with 15% Increase
Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis
Policy Form: 30225

			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
	1992	8	145	0	0	0.0%	0.0%	409	0	0	0.0%	0.0%	5.00%	2.8202
	1993	8,609	2,687,161	13,547	147,465	0.5%	5.5%	7,217,338	36,384	396,071	0.5%	5.5%	5.00%	2.6859
	1994	22,300	12,916,809	161,852	1,546,420	1.3%	12.0%	33,040,700	414,010	3,955,682	1.3%	12.0%	5.00%	2.5580
	1995	39,388	26,751,336	524,580	3,369,053	2.0%	12.6%	65,170,369	1,277,959	8,207,531	2.0%	12.6%	5.00%	2.4362
	1996	61,189	42,758,453	1,649,792	6,593,399	3.9%	15.4%	99,205,876	3,827,760	15,297,652	3.9%	15.4%	5.00%	2.3201
	1997	74,032	58,783,795	3,090,519	7,424,220	5.3%	12.6%	129,892,397	6,829,006	16,405,027	5.3%	12.6%	5.00%	2.2097
	1998	77,314	67,697,736	4,844,252	13,305,497	7.2%	19.7%	142,465,910	10,194,443	28,000,638	7.2%	19.7%	5.00%	2.1044
Historical	1999	74,116	66,592,712	7,367,115	18,669,759	11.1%	28.0%	133,467,097	14,765,391	37,418,487	11.1%	28.0%	5.00%	2.0042
Experience	2000	71,332	63,713,697	10,763,930	19,274,006	16.9%	30.3%	121,616,084	20,546,085	36,790,035	16.9%	30.3%	5.00%	1.9088
	2001	69,192	61,140,894	14,405,241	23,482,824	23.6%	38.4%	111,147,755	26,187,223	42,689,320	23.6%	38.4%	5.00%	1.8179
	2002	67,285	58,984,823	18,680,647	31,882,410	31.7%	54.1%	102,122,138	32,342,347	55,198,942	31.7%	54.1%	5.00%	1.7313
	2003	65,504	56,853,917	23,278,895	35,876,618	40.9%	63.1%	93,745,559	38,384,216	59,156,411	40.9%	63.1%	5.00%	1.6489
	2004	63,859	55,057,979	27,534,536	33,373,239	50.0%	60.6%	86,461,205	43,239,312	52,408,215	50.0%	60.6%	5.00%	1.5704
	2005	61,372	50,157,191	31,341,086	29,998,753	62.5%	59.8%	75,014,448	46,873,324	44,865,749	62.5%	59.8%	5.00%	1.4956
	2006	59,452	52,775,548	33,562,912	39,771,059	63.6%	75.4%	75,171,838	47,805,961	56,648,651	63.6%	75.4%	5.00%	1.4244
	2007	57,749	60,977,339	37,427,898	44,353,590	61.4%	72.7%	82,718,298	50,772,501	60,167,491	61.4%	72.7%	5.00%	1.3565
	2008	55,636	59,305,602	42,350,250	46,598,165	71.4%	78.6%	76,619,540	54,714,167	60,202,237	71.4%	78.6%	5.00%	1.2919
	2009	53,387	63,016,024	47,512,751	52,752,330	75.4%	83.7%	77,536,379	58,460,793	64,907,692	75.4%	83.7%	5.00%	1.2304
	2010	51,455	67,630,762	52,103,000	49,544,460	77.0%	73.3%	79,251,867	61,055,944	58,057,766	77.0%	73.3%	5.00%	1.1718
	2011	49,498	65,407,470	55,618,997	66,353,503	85.0%	101.4%	72,996,707	62,072,477	74,052,509	85.0%	101.4%	5.00%	1.1160
	2012	47,526	62,193,076	63,058,486	67,431,878	101.4%	108.4%	66,104,140	67,023,973	71,672,389	101.4%	108.4%	5.00%	1.0629
	1/2013-9/2013	46,237	48,200,249	50,781,323	56,489,129	105.4%	117.2%	49,090,252	51,718,986	57,532,184	105.4%	117.2%	5.00%	1.0185
	10/2013-12/2013	45,551	16,542,560	19,923,980	19,587,615	120.4%	118.4%	16,441,978	19,802,838	19,468,518	120.4%	118.4%	5.00%	0.9939
	2014	43,171	64,915,114	65,737,003	81,563,789	101.3%	125.6%	62,582,636	63,374,993	78,633,104	101.3%	125.6%	5.00%	0.9641
	2015	40,929	66,712,682	72,363,554	87,202,826	108.5%	130.7%	61,252,966	66,441,375	80,066,213	108.5%	130.7%	5.00%	0.9182
	2016	38,858	63,074,856	83,630,296	92,532,076	132.6%	146.7%	55,155,102	73,129,577	80,913,639	132.6%	146.7%	5.00%	0.8744
	2017	36,749	58,767,348	93,258,649	97,953,656	158.7%	166.7%	48,941,381	77,665,698	81,575,694	158.7%	166.7%	5.00%	0.8328
	2018	34,608	54,519,281	100,053,520	104,004,108	183.5%	190.8%	43,241,520	79,356,627	82,490,004	183.5%	190.8%	5.00%	0.7931
Projected	2019	32,445	50,347,739	106,060,178	110,168,993	210.7%	218.8%	38,031,329	80,115,008	83,218,696	210.7%	218.8%	5.00%	0.7554
Future	2020	30,270	46,272,239	112,436,936	116,265,813	243.0%	251.3%	33,288,387	80,887,467	83,641,972	243.0%	251.3%	5.00%	0.7194
Experience	2021	28,096	42,310,863	118,977,156	122,153,707	281.2%	288.7%	28,989,106	81,516,686	83,693,086	281.2%	288.7%	5.00%	0.6851
	2022	25,941	38,487,785	125,419,995	127,796,549	325.9%	332.0%	25,114,038	81,839,019	83,389,767	325.9%	332.0%	5.00%	0.6525
	2023	23,818	34,824,918	131,662,005	133,413,520	378.1%	383.1%	21,641,852	81,821,003	82,909,477	378.1%	383.1%	5.00%	0.6214
	2024	21,738	31,336,072	137,691,456	138,907,414	439.4%	443.3%	18,546,399	81,493,323	82,212,994	439.4%	443.3%	5.00%	0.5919
	2025	19,715	28,030,893	143,479,919	143,881,483	511.9%	513.3%	15,800,203	80,875,477	81,101,828	511.9%	513.3%	5.00%	0.5637
	2026	17,765	24,921,639	149,012,248	148,144,978	597.9%	594.4%	13,378,673	79,994,183	79,528,606	597.9%	594.4%	5.00%	0.5368
	2027	15,902	22,020,472	154,362,556	151,081,846	701.0%	686.1%	11,258,325	78,920,367	77,243,051	701.0%	686.1%	5.00%	0.5113
	2028	14,134	19,332,029	158,968,211	151,717,655	822.3%	784.8%	9,413,157	77,404,841	73,874,399	822.3%	784.8%	5.00%	0.4869
	2029	12,473	16,858,933	162,251,907	150,223,605	962.4%	891.1%	7,818,053	75,241,657	69,663,729	962.4%	891.1%	5.00%	0.4637
	2030	10,926	14,603,672	163,990,968	147,226,998	1122.9%	1008.2%	6,449,727	72,426,779	65,022,954	1122.9%	1008.2%	5.00%	0.4417
	2031	9,497	12,561,773	164,166,221	143,010,998	1306.9%	1138.5%	5,283,733	69,051,599	60,153,289	1306.9%	1138.5%	5.00%	0.4206
	2032	8,189	10,725,902	162,817,247	137,588,586	1518.0%	1282.8%	4,296,695	65,223,042	55,116,680	1518.0%	1282.8%	5.00%	0.4006
	2033	7,008	9,091,671	159,994,683	131,032,928	1759.8%	1441.2%	3,468,607	61,040,333	49,990,996	1759.8%	1441.2%	5.00%	0.3815
	2034	5,951	7,651,872	155,757,305	123,409,043	2035.5%	1612.8%	2,780,288	56,594,010	44,840,354	2035.5%	1612.8%	5.00%	0.3633
	2035	5,014	6,393,916	150,178,887	114,893,563	2348.8%	1796.9%	2,212,583	51,968,673	39,758,358	2348.8%	1796.9%	5.00%	0.3460
	2036	4,190	5,303,358	143,369,214	105,657,695	2703.4%	1992.3%	1,747,811	47,249,732	34,821,268	2703.4%	1992.3%	5.00%	0.3296
	2037	3,472	4,365,429	135,465,805	95,927,107	3103.1%	2197.4%	1,370,191	42,519,077	30,108,942	3103.1%	2197.4%	5.00%	0.3139
	2038	2,853	3,565,380	126,657,012	86,036,066	3552.4%	2413.1%	1,065,788	37,861,175	25,718,486	3552.4%	2413.1%	5.00%	0.2989
	2039	2,323	2,888,705	117,172,887	76,244,850	4056.2%	2639.4%	822,392	33,358,205	21,706,313	4056.2%	2639.4%	5.00%	0.2847
	2040	1,875	2,321,339	107,261,091	66,789,697	4620.7%	2877.2%	629,397	29,082,281	18,109,052	4620.7%	2877.2%	5.00%	0.2711
	2041	1,500	1,849,838	97,167,183	57,865,762	5252.7%	3128.2%	477,673	25,090,919	14,942,341	5252.7%	3128.2%	5.00%	0.2582
	2042	1,189	1,461,527	87,126,339	49,636,929	5961.3%	3396.2%	359,430	21,426,790	12,207,101	5961.3%	3396.2%	5.00%	0.2459
	2043	933	1,144,638	77,350,809	42,188,093	6757.7%	3685.7%	268,094	18,116,872	9,881,167	6757.7%	3685.7%	5.00%	0.2342
	2044	725	888,419	68,014,611	35,525,184	7655.7%	3998.7%	198,174	15,171,596	7,924,382	7655.7%	3998.7%	5.00%	0.2231
	2045	558	683,193	59,246,157	29,619,523	8671.9%	4335.5%	145,139	12,586,354	6,292,422	8671.9%	4335.5%	5.00%	0.2124
	2046	425	520,372	51,128,514	24,424,851	9825.4%	4693.7%	105,285	10,344,598	4,941,768	9825.4%	4693.7%	5.00%	0.2023
	2047	320	392,445	43,707,047	19,891,280	11137.1%	5068.5%	75,621	8,421,949	3,832,868	11137.1%	5068.5%	5.00%	0.1927
	2048	238	292,933	36,998,832	15,975,877	12630.5%	5453.8%	53,758	6,789,845	2,931,815	12630.5%	5453.8%	5.00%	0.1835
	2049	175	216,319	31,002,105	12,641,127	14331.6%	5843.7%	37,807	5,418,433	2,209,369	14331.6%	5843.7%	5.00%	0.1748
	2050	128	157,964	25,702,445	9,850,568	16271.0%	6235.9%	26,294	4,278,265	1,639,663	16271.0%	6235.9%	5.00%	0.1665
	2051	92	114,011	21,074,625	7,557,720	18484.7%	6628.9%	18,074	3,340,903	1,198,105	18484.7%	6628.9%	5.00%	0.1585
	2052	65	81,287	17,085,866	5,719,065	21019.1%	7035.6%	12,273	2,579,596	863,455	21019.1%	7035.6%	5.00%	0.1510
	Past		1,103,602,716	526,071,609	648,237,776	47.7%	58.7%	1,780,056,306	698,542,262	904,030,678	39.2%	50.8%		
	Future		766,551,388	4,137,725,423	3,515,313,141	539.8%	458.6%	542,799,935	1,959,821,167	1,817,835,923	361.1%	334.9%		
	Lifetime		1,870,154,104	4,663,797,031	4,163,550,917	249.4%	222.6%	2,322,856,241	2,658,363,429	2,721,866,602	114.4%	117.2%		

EXHIBIT XI
RiverSource Life Insurance Company
Virginia Experience Projections with No Increase
Policy Form: 30225-VA

			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
	1992	0	0	0	0	0.0%	0.0%	0	0	0	0.0%	0.0%	5.00%	2.8202
	1993	292	98,888	0	0	0.0%	0.0%	265,599	0	0	0.0%	0.0%	5.00%	2.6859
	1994	748	418,230	6,490	387,631	1.6%	92.7%	1,069,817	16,602	991,546	1.6%	92.7%	5.00%	2.5580
	1995	1,435	902,340	21,320	213	2.4%	0.0%	2,198,239	51,940	518	2.4%	0.0%	5.00%	2.4362
	1996	2,393	1,529,333	36,792	155,443	2.4%	10.2%	3,548,276	85,363	360,651	2.4%	10.2%	5.00%	2.3201
	1997	2,963	2,145,118	114,365	826,897	5.3%	38.5%	4,739,989	252,709	1,827,165	5.3%	38.5%	5.00%	2.2097
	1998	3,018	2,525,593	96,075	1,429,632	3.8%	56.6%	5,314,962	202,185	3,008,576	3.8%	56.6%	5.00%	2.1044
Historical	1999	2,846	2,386,879	168,375	679,862	7.1%	28.5%	4,783,855	337,461	1,362,600	7.1%	28.5%	5.00%	2.0042
Experience	2000	2,760	2,297,144	311,758	21,598	13.6%	0.9%	4,384,767	595,081	41,227	13.6%	0.9%	5.00%	1.9088
	2001	2,695	2,227,711	442,777	805,162	19.9%	36.1%	4,049,745	804,922	1,463,700	19.9%	36.1%	5.00%	1.8179
	2002	2,643	2,167,337	547,360	1,571,307	25.3%	72.5%	3,752,373	947,661	2,720,450	25.3%	72.5%	5.00%	1.7313
	2003	2,569	2,102,370	761,208	1,381,359	36.2%	65.7%	3,466,566	1,255,145	2,277,702	36.2%	65.7%	5.00%	1.6489
	2004	2,511	2,035,594	1,021,139	1,529,432	50.2%	75.1%	3,196,629	1,603,563	2,401,768	50.2%	75.1%	5.00%	1.5704
	2005	2,466	1,964,083	995,965	716,605	50.7%	36.5%	2,937,457	1,489,553	1,071,746	50.7%	36.5%	5.00%	1.4956
	2006	2,378	2,068,834	1,250,293	1,314,435	60.4%	63.5%	2,946,782	1,780,878	1,872,240	60.4%	63.5%	5.00%	1.4244
	2007	2,300	2,293,050	1,337,956	965,508	58.3%	42.1%	3,110,617	1,814,993	1,309,752	58.3%	42.1%	5.00%	1.3565
	2008	2,234	2,228,600	1,542,727	1,247,936	69.2%	56.0%	2,879,227	1,993,117	1,612,264	69.2%	56.0%	5.00%	1.2919
	2009	2,165	2,362,148	1,389,060	2,092,374	58.8%	88.6%	2,906,442	1,709,132	2,574,506	58.8%	88.6%	5.00%	1.2304
	2010	2,099	2,564,764	1,650,590	1,007,494	64.4%	39.3%	3,005,471	1,934,213	1,180,614	64.4%	39.3%	5.00%	1.1718
	2011	2,052	2,515,138	1,971,187	1,974,607	78.4%	78.5%	2,806,970	2,199,904	2,203,721	78.4%	78.5%	5.00%	1.1160
	2012	1,998	2,450,850	2,063,176	894,884	84.2%	36.5%	2,604,974	2,192,920	951,160	84.2%	36.5%	5.00%	1.0629
	1/2013-9/2013	1,944	1,915,182	1,612,223	1,094,472	84.2%	57.1%	1,950,545	1,641,992	1,114,681	84.2%	57.1%	5.00%	1.0185
	10/2013-12/2013	1,926	652,989	870,083	698,670	133.2%	107.0%	649,018	864,793	694,422	133.2%	107.0%	5.00%	0.9939
	2014	1,855	2,533,548	2,476,860	2,935,049	97.8%	115.8%	2,442,515	2,387,863	2,829,589	97.8%	115.8%	5.00%	0.9641
	2015	1,781	2,405,575	2,633,089	3,173,963	109.5%	131.9%	2,208,705	2,417,599	2,914,208	109.5%	131.9%	5.00%	0.9182
	2016	1,705	2,275,968	2,988,019	3,446,056	131.3%	151.4%	1,990,195	2,612,840	3,013,365	131.3%	151.4%	5.00%	0.8744
	2017	1,626	2,145,041	3,359,161	3,738,104	156.6%	174.3%	1,786,388	2,797,505	3,113,089	156.6%	174.3%	5.00%	0.8328
	2018	1,544	2,013,146	3,669,925	4,037,957	182.3%	200.6%	1,596,710	2,910,771	3,202,672	182.3%	200.6%	5.00%	0.7931
Projected	2019	1,460	1,880,985	3,979,731	4,355,450	211.6%	231.6%	1,420,845	3,006,182	3,289,990	211.6%	231.6%	5.00%	0.7554
Future	2020	1,374	1,749,270	4,307,022	4,681,644	246.2%	267.6%	1,258,430	3,098,485	3,367,988	246.2%	267.6%	5.00%	0.7194
Experience	2021	1,286	1,618,727	4,643,453	5,018,302	286.9%	310.0%	1,109,064	3,181,442	3,438,268	286.9%	310.0%	5.00%	0.6851
	2022	1,199	1,490,303	4,990,274	5,347,990	334.8%	358.9%	972,452	3,256,252	3,489,669	334.8%	358.9%	5.00%	0.6525
	2023	1,111	1,364,995	5,338,326	5,696,121	391.1%	417.3%	848,272	3,317,488	3,539,839	391.1%	417.3%	5.00%	0.6214
	2024	1,023	1,243,263	5,700,173	6,053,349	458.5%	486.9%	735,831	3,373,674	3,582,703	458.5%	486.9%	5.00%	0.5919
	2025	937	1,125,732	6,060,844	6,391,997	538.4%	567.8%	634,542	3,416,322	3,602,984	538.4%	567.8%	5.00%	0.5637
	2026	852	1,013,080	6,425,728	6,706,223	634.3%	662.0%	543,851	3,449,521	3,600,099	634.3%	662.0%	5.00%	0.5368
	2027	770	905,949	6,785,468	6,953,346	749.0%	767.5%	463,181	3,469,181	3,555,011	749.0%	767.5%	5.00%	0.5113
	2028	691	804,815	7,114,615	7,075,135	884.0%	879.1%	391,881	3,464,250	3,445,026	884.0%	879.1%	5.00%	0.4869
	2029	615	710,043	7,381,662	7,094,035	1039.6%	999.1%	329,271	3,423,125	3,289,742	1039.6%	999.1%	5.00%	0.4637
	2030	544	622,030	7,576,058	7,049,016	1218.0%	1133.2%	274,720	3,345,974	3,113,205	1218.0%	1133.2%	5.00%	0.4417
	2031	477	540,915	7,697,738	6,951,763	1423.1%	1285.2%	227,520	3,237,823	2,924,051	1423.1%	1285.2%	5.00%	0.4206
	2032	415	466,675	7,748,539	6,789,121	1660.4%	1454.8%	186,945	3,103,991	2,719,658	1660.4%	1454.8%	5.00%	0.4006
	2033	358	399,525	7,727,686	6,561,593	1934.2%	1642.3%	152,425	2,948,226	2,503,345	1934.2%	1642.3%	5.00%	0.3815
	2034	306	339,481	7,633,938	6,263,525	2248.7%	1845.0%	123,350	2,773,771	2,275,835	2248.7%	1845.0%	5.00%	0.3633
	2035	260	286,236	7,464,488	5,889,274	2607.8%	2057.5%	99,051	2,583,050	2,037,955	2607.8%	2057.5%	5.00%	0.3460
	2036	218	239,423	7,217,497	5,455,162	3014.5%	2278.5%	78,906	2,378,647	1,797,840	3014.5%	2278.5%	5.00%	0.3296
	2037	182	198,629	6,896,464	4,976,847	3472.0%	2505.6%	62,344	2,164,615	1,562,099	3472.0%	2505.6%	5.00%	0.3139
	2038	151	163,410	6,509,326	4,475,312	3983.4%	2738.7%	48,848	1,945,812	1,337,791	3983.4%	2738.7%	5.00%	0.2989
	2039	123	133,292	6,068,308	3,971,844	4552.6%	2979.8%	37,947	1,727,600	1,130,753	4552.6%	2979.8%	5.00%	0.2847
	2040	100	107,788	5,588,801	3,483,943	5185.0%	3232.2%	29,225	1,515,322	944,620	5185.0%	3232.2%	5.00%	0.2711
	2041	81	86,403	5,087,563	3,026,662	5888.2%	3503.0%	22,311	1,313,732	781,557	5888.2%	3503.0%	5.00%	0.2582
	2042	64	68,648	4,580,685	2,606,664	6672.7%	3797.1%	16,882	1,126,518	641,051	6672.7%	3797.1%	5.00%	0.2459
	2043	51	54,053	4,082,072	2,227,832	7552.0%	4121.6%	12,660	956,091	521,796	7552.0%	4121.6%	5.00%	0.2342
	2044	40	42,173	3,602,922	1,888,690	8543.2%	4478.5%	9,407	803,681	421,298	8543.2%	4478.5%	5.00%	0.2231
	2045	31	32,597	3,151,293	1,587,680	9667.3%	4870.6%	6,925	669,466	337,289	9667.3%	4870.6%	5.00%	0.2124
	2046	23	24,956	2,732,145	1,321,070	10947.9%	5293.6%	5,049	552,782	267,286	10947.9%	5293.6%	5.00%	0.2023
	2047	18	18,918	2,347,734	1,084,548	12409.8%	5732.8%	3,645	452,387	208,983	12409.8%	5732.8%	5.00%	0.1927
	2048	13	14,197	1,998,838	879,333	14079.5%	6193.9%	2,605	366,817	161,371	14079.5%	6193.9%	5.00%	0.1835
	2049	10	10,543	1,685,692	702,751	15989.1%	6665.7%	1,843	294,619	122,824	15989.1%	6665.7%	5.00%	0.1748
	2050	7	7,745	1,407,452	552,863	18171.8%	7138.1%	1,289	234,276	92,026	18171.8%	7138.1%	5.00%	0.1665
	2051	5	5,627	1,162,757	427,784	20662.8%	7601.9%	892	184,329	67,815	20662.8%	7601.9%	5.00%	0.1585
	2052	4	4,042	950,134	326,758	23507.6%	8084.5%	610	143,450	49,333	23507.6%	8084.5%	5.00%	0.1510
	Past		41,199,188	17,340,838	20,096,852	42.1%	48.8%	65,919,306	22,909,335	30,346,585	34.8%	46.0%		
	Future		29,800,734	189,642,565	161,903,424	636.4%	543.3%	20,786,552	85,270,271	79,988,446	410.2%	384.8%		
	Lifetime		70,999,921	206,983,402	182,000,276	291.5%	256.3%	86,705,858	108,179,605	110,335,031	124.8%	127.3%		

EXHIBIT XI
RiverSource Life Insurance Company
Virginia Experience Projections with 15% Increase
Policy Form: 30225-VA

			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
	1992	0	0	0	0	0.0%	0.0%	0	0	0	0.0%	0.0%	5.00%	2.8202
	1993	292	98,888	0	0	0.0%	0.0%	265,599	0	0	0.0%	0.0%	5.00%	2.6859
	1994	748	418,230	6,490	387,631	1.6%	92.7%	1,069,817	16,602	991,546	1.6%	92.7%	5.00%	2.5580
	1995	1,435	902,340	21,320	213	2.4%	0.0%	2,198,239	51,940	518	2.4%	0.0%	5.00%	2.4362
	1996	2,393	1,529,333	36,792	155,443	2.4%	10.2%	3,548,276	85,363	360,651	2.4%	10.2%	5.00%	2.3201
	1997	2,963	2,145,118	114,365	826,897	5.3%	38.5%	4,739,989	252,709	1,827,165	5.3%	38.5%	5.00%	2.2097
	1998	3,018	2,525,593	96,075	1,429,632	3.8%	56.6%	5,314,962	202,185	3,008,576	3.8%	56.6%	5.00%	2.1044
Historical	1999	2,846	2,386,879	168,375	679,862	7.1%	28.5%	4,783,855	337,461	1,362,600	7.1%	28.5%	5.00%	2.0042
Experience	2000	2,760	2,297,144	311,758	21,598	13.6%	0.9%	4,384,767	595,081	41,227	13.6%	0.9%	5.00%	1.9088
	2001	2,695	2,227,711	442,777	805,162	19.9%	36.1%	4,049,745	804,922	1,463,700	19.9%	36.1%	5.00%	1.8179
	2002	2,643	2,167,337	547,360	1,571,307	25.3%	72.5%	3,752,373	947,661	2,720,450	25.3%	72.5%	5.00%	1.7313
	2003	2,569	2,102,370	761,208	1,381,359	36.2%	65.7%	3,466,566	1,255,145	2,277,702	36.2%	65.7%	5.00%	1.6489
	2004	2,511	2,035,594	1,021,139	1,529,432	50.2%	75.1%	3,196,629	1,603,563	2,401,768	50.2%	75.1%	5.00%	1.5704
	2005	2,466	1,964,083	995,965	716,605	50.7%	36.5%	2,937,457	1,489,553	1,071,746	50.7%	36.5%	5.00%	1.4956
	2006	2,378	2,068,834	1,250,293	1,314,435	60.4%	63.5%	2,946,782	1,780,878	1,872,240	60.4%	63.5%	5.00%	1.4244
	2007	2,300	2,293,050	1,337,956	965,508	58.3%	42.1%	3,110,617	1,814,993	1,309,752	58.3%	42.1%	5.00%	1.3565
	2008	2,234	2,228,600	1,542,727	1,247,936	69.2%	56.0%	2,879,227	1,993,117	1,612,264	69.2%	56.0%	5.00%	1.2919
	2009	2,165	2,362,148	1,389,060	2,092,374	58.8%	88.6%	2,906,442	1,709,132	2,574,506	58.8%	88.6%	5.00%	1.2304
	2010	2,099	2,564,764	1,650,590	1,007,494	64.4%	39.3%	3,005,471	1,934,213	1,180,614	64.4%	39.3%	5.00%	1.1718
	2011	2,052	2,515,138	1,971,187	1,974,607	78.4%	78.5%	2,806,970	2,199,904	2,203,721	78.4%	78.5%	5.00%	1.1160
	2012	1,998	2,450,850	2,063,176	894,884	84.2%	36.5%	2,604,974	2,192,920	951,160	84.2%	36.5%	5.00%	1.0629
	1/2013-9/2013	1,944	1,915,182	1,612,223	1,094,472	84.2%	57.1%	1,950,545	1,641,992	1,114,681	84.2%	57.1%	5.00%	1.0185
	10/2013-12/2013	1,926	652,989	870,083	698,670	133.2%	107.0%	649,018	864,793	694,422	133.2%	107.0%	5.00%	0.9939
	2014	1,840	2,578,414	2,476,709	2,932,983	96.1%	113.8%	2,485,768	2,387,718	2,827,597	96.1%	113.8%	5.00%	0.9641
	2015	1,758	2,680,623	2,633,279	3,181,694	98.2%	118.7%	2,461,243	2,417,773	2,921,306	98.2%	118.7%	5.00%	0.9182
	2016	1,683	2,565,149	2,988,334	3,427,267	116.5%	133.6%	2,243,066	2,613,115	2,996,935	116.5%	133.6%	5.00%	0.8744
	2017	1,604	2,417,591	3,349,577	3,683,611	138.6%	152.4%	2,013,367	2,789,524	3,067,707	138.6%	152.4%	5.00%	0.8328
	2018	1,524	2,268,942	3,644,418	3,972,583	160.6%	175.1%	1,799,593	2,890,540	3,150,822	160.6%	175.1%	5.00%	0.7931
Projected	2019	1,441	2,119,992	3,939,508	4,283,539	185.8%	202.1%	1,601,385	2,975,798	3,235,671	185.8%	202.1%	5.00%	0.7554
Future	2020	1,356	1,971,545	4,253,769	4,602,965	215.8%	233.5%	1,418,336	3,060,174	3,311,386	215.8%	233.5%	5.00%	0.7194
Experience	2021	1,270	1,824,417	4,578,939	4,932,603	251.0%	270.4%	1,249,992	3,137,240	3,379,552	251.0%	270.4%	5.00%	0.6851
	2022	1,183	1,679,677	4,915,625	5,255,330	292.7%	312.9%	1,096,023	3,207,542	3,429,206	292.7%	312.9%	5.00%	0.6525
	2023	1,096	1,538,449	5,254,026	5,596,107	341.5%	363.7%	956,065	3,265,101	3,477,686	341.5%	363.7%	5.00%	0.6214
	2024	1,010	1,401,250	5,606,453	5,945,774	400.1%	424.3%	829,336	3,318,205	3,519,034	400.1%	424.3%	5.00%	0.5919
	2025	925	1,268,785	5,957,938	6,277,183	469.6%	494.7%	715,177	3,358,317	3,538,266	469.6%	494.7%	5.00%	0.5637
	2026	841	1,141,819	6,313,961	6,584,614	553.0%	576.7%	612,962	3,389,521	3,534,815	553.0%	576.7%	5.00%	0.5368
	2027	760	1,021,075	6,665,334	6,826,197	652.8%	668.5%	522,041	3,407,760	3,490,004	652.8%	668.5%	5.00%	0.5113
	2028	682	907,090	6,987,028	6,944,816	770.3%	765.6%	441,681	3,402,125	3,381,572	770.3%	765.6%	5.00%	0.4869
	2029	607	800,276	7,247,992	6,962,518	905.7%	870.0%	371,115	3,361,137	3,228,754	905.7%	870.0%	5.00%	0.4637
	2030	537	701,079	7,437,772	6,917,560	1060.9%	986.7%	309,632	3,284,900	3,055,147	1060.9%	986.7%	5.00%	0.4417
	2031	471	609,655	7,556,240	6,821,418	1239.4%	1118.9%	256,433	3,178,306	2,869,225	1239.4%	1118.9%	5.00%	0.4206
	2032	409	525,980	7,605,200	6,661,196	1445.9%	1266.4%	210,703	3,046,571	2,668,412	1445.9%	1266.4%	5.00%	0.4006
	2033	353	450,297	7,583,908	6,437,404	1684.2%	1429.6%	171,795	2,893,373	2,455,965	1684.2%	1429.6%	5.00%	0.3815
	2034	302	382,623	7,491,159	6,144,503	1957.8%	1605.9%	139,025	2,721,893	2,232,589	1957.8%	1605.9%	5.00%	0.3633
	2035	256	322,612	7,324,216	5,776,964	2270.3%	1790.7%	111,638	2,534,509	1,999,090	2270.3%	1790.7%	5.00%	0.3460
	2036	216	269,849	7,081,286	5,350,797	2624.2%	1982.9%	88,933	2,333,757	1,763,445	2624.2%	1982.9%	5.00%	0.3296
	2037	180	223,871	6,765,809	4,881,358	3022.2%	2180.4%	70,267	2,123,606	1,532,127	3022.2%	2180.4%	5.00%	0.3139
	2038	149	184,176	6,385,577	4,389,221	3467.1%	2383.2%	55,055	1,908,820	1,312,056	3467.1%	2383.2%	5.00%	0.2989
	2039	122	150,231	5,952,580	3,895,255	3962.3%	2592.8%	42,770	1,694,653	1,108,949	3962.3%	2592.8%	5.00%	0.2847
	2040	99	121,485	5,481,912	3,416,614	4512.4%	2812.4%	32,939	1,486,341	926,365	4512.4%	2812.4%	5.00%	0.2711
	2041	80	97,383	4,990,006	2,968,050	5124.1%	3047.8%	25,147	1,288,540	766,422	5124.1%	3047.8%	5.00%	0.2582
	2042	63	77,372	4,492,636	2,556,089	5806.5%	3303.6%	19,028	1,104,864	628,613	5806.5%	3303.6%	5.00%	0.2459
	2043	50	60,922	4,003,432	2,184,529	6571.4%	3585.8%	14,269	937,672	511,654	6571.4%	3585.8%	5.00%	0.2342
	2044	39	47,532	3,533,368	1,851,918	7433.7%	3896.1%	10,603	788,166	413,096	7433.7%	3896.1%	5.00%	0.2231
	2045	30	36,740	3,090,339	1,556,720	8411.4%	4237.1%	7,805	656,517	330,712	8411.4%	4237.1%	5.00%	0.2124
	2046	23	28,127	2,679,202	1,295,271	9525.3%	4605.0%	5,691	542,071	262,066	9525.3%	4605.0%	5.00%	0.2023
	2047	18	21,323	2,302,162	1,063,341	10796.8%	4986.9%	4,109	443,606	204,896	10796.8%	4986.9%	5.00%	0.1927
	2048	13	16,001	1,959,976	862,117	12249.1%	5387.9%	2,936	359,685	158,212	12249.1%	5387.9%	5.00%	0.1835
	2049	10	11,882	1,652,869	688,977	13910.1%	5798.3%	2,077	288,882	120,417	13910.1%	5798.3%	5.00%	0.1748
	2050	7	8,730	1,380,010	542,016	15808.5%	6209.0%	1,453	229,708	90,221	15808.5%	6209.0%	5.00%	0.1665
	2051	5	6,342	1,140,057	419,383	17975.1%	6612.4%	1,005	180,730	66,484	17975.1%	6612.4%	5.00%	0.1585
	2052	4	4,555	931,563	320,336	20449.5%	7031.9%	688	140,646	48,364	20449.5%	7031.9%	5.00%	0.1510
	Past		41,199,188	17,340,838	20,096,852	42.1%	48.8%	65,919,306	22,909,335	30,346,585	34.8%	46.0%		
	Future		33,196,852	186,504,253	159,109,489	561.8%	479.3%	23,050,169	84,014,200	78,709,261	364.5%	341.5%		
	Lifetime		74,396,039	203,845,090	179,206,342	274.0%	240.9%	88,969,474	106,923,535	109,055,846	120.2%	122.6%		

EXHIBIT XII
RiverSource Life Insurance Company
Incurred Loss Ratio Including the Change in Active Life Reserves
Nationwide Experience, without Interest
Policy Form: 30225

Calendar Year	(a) Earned Premiums [1]	(b) Incurred Claims	(c) Change in Active Life Reserves	(d) = (b+c)/(a) Loss Ratio
1992	145	0	2,281	1574.9%
1993	2,687,161	147,465	2,187,746	86.9%
1994	12,916,809	1,546,420	6,728,825	64.1%
1995	26,751,336	3,369,053	20,553,179	89.4%
1996	42,758,453	6,593,399	40,805,281	110.9%
1997	58,783,795	7,424,220	62,937,799	119.7%
1998	67,697,736	13,305,497	85,338,045	145.7%
1999	66,592,712	18,669,759	97,436,710	174.4%
2000	63,713,697	19,274,006	99,581,777	186.5%
2001	61,140,894	23,482,824	99,140,594	200.6%
2002	58,984,823	31,882,410	98,790,662	221.5%
2003	56,853,917	35,876,618	98,106,868	235.7%
2004	55,057,979	33,373,239	96,998,189	236.8%
2005	50,157,191	29,998,753	94,262,483	247.7%
2006	52,775,548	39,771,059	82,526,046	231.7%
2007	60,977,339	44,353,590	87,342,836	216.0%
2008	59,305,602	46,598,165	78,634,716	211.2%
2009	63,016,024	52,752,330	68,093,179	191.8%
2010	67,630,762	49,544,460	72,418,451	180.3%
2011	65,407,470	66,353,503	(20,112,060)	70.7%
2012	62,193,076	67,431,878	63,535,007	210.6%
1/2013-9/2013	48,200,249	56,489,129	31,678,715	182.9%
Total	1,103,602,716	648,237,776	1,366,987,327	182.6%

[1] Premiums reflect the accumulated 105.3% rate increases as approved in Virginia and implemented from 2006 through 2013 on a nationwide basis.

EXHIBIT XIII
RiverSource Life Insurance Company
Incurred Loss Ratio Including the Change in Active Life Reserves
Virginia Experience, without Interest
Policy Form: 30225-VA

Calendar Year	(a) Earned Premiums	(b) Incurred Claims	(c) Change in Active Life Reserves	(d) = (b+c)/(a) Loss Ratio
1992	0	0	0	0.0%
1993	98,888	0	62,482	63.2%
1994	418,230	387,631	219,685	145.2%
1995	902,340	213	716,313	79.4%
1996	1,529,333	155,443	1,483,297	107.2%
1997	2,145,118	826,897	2,527,099	156.4%
1998	2,525,593	1,429,632	3,453,710	193.4%
1999	2,386,879	679,862	4,031,957	197.4%
2000	2,297,144	21,598	4,034,887	176.6%
2001	2,227,711	805,162	4,048,401	217.9%
2002	2,167,337	1,571,307	4,066,188	260.1%
2003	2,102,370	1,381,359	4,072,728	259.4%
2004	2,035,594	1,529,432	4,067,764	275.0%
2005	1,964,083	716,605	4,650,193	273.2%
2006	2,068,834	1,314,435	2,875,871	202.5%
2007	2,293,050	965,508	3,462,246	193.1%
2008	2,228,600	1,247,936	3,715,408	222.7%
2009	2,362,148	2,092,374	3,207,960	224.4%
2010	2,564,764	1,007,494	3,532,788	177.0%
2011	2,515,138	1,974,607	97,227	82.4%
2012	2,450,850	894,884	3,656,709	185.7%
1/2013-9/2013	1,915,182	1,094,472	1,542,758	137.7%
Total	41,199,188	20,096,852	59,525,670	193.3%

EXHIBIT XIV

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	47.22	34.92	88.30	65.72	110.88	82.14
41	47.22	34.92	88.30	65.72	110.88	82.14
42	47.22	34.92	88.30	65.72	110.88	82.14
43	47.22	34.92	88.30	65.72	110.88	82.14
44	47.22	34.92	88.30	65.72	110.88	82.14
45	47.22	34.92	88.30	65.72	110.88	82.14
46	51.34	39.00	92.40	69.80	117.04	88.30
47	51.34	39.00	94.46	69.80	119.08	88.30
48	53.38	39.00	96.48	71.88	121.14	90.34
49	53.38	41.08	96.48	73.92	123.22	92.40
50	55.44	41.08	98.56	73.92	125.24	94.46
51	57.50	43.12	102.64	78.04	129.36	98.56
52	61.60	45.18	106.78	80.06	135.50	102.64
53	63.64	47.22	110.88	84.18	141.66	106.78
54	67.76	51.34	117.04	88.30	149.90	112.90
55	75.96	57.50	129.36	98.56	166.32	125.24
56	82.14	63.64	141.66	108.82	180.68	141.66
57	90.34	69.80	153.98	119.08	197.12	151.94
58	100.62	78.04	170.40	129.36	215.60	166.32
59	112.90	84.18	186.86	141.66	238.18	180.68
60	125.24	98.56	205.32	162.20	260.76	205.32
61	139.64	112.90	232.02	188.90	291.54	236.12
62	153.98	121.14	252.54	201.20	320.32	252.54
63	176.58	143.72	289.50	234.04	365.48	295.66
64	199.18	156.06	324.42	254.62	408.58	322.34
65	221.76	180.68	355.18	289.50	447.58	365.48
66	242.28	193.02	381.90	305.92	482.50	386.00
67	268.96	213.54	420.90	334.68	527.68	418.86
68	295.66	242.28	457.86	373.68	572.84	466.08
69	332.60	262.80	509.20	404.48	634.44	503.04
70	367.52	291.54	558.46	443.48	691.94	550.28
71	402.44	318.26	603.64	478.40	741.20	589.26
72	441.42	351.10	659.08	525.62	798.68	636.50
73	490.70	394.22	720.66	579.00	864.38	696.02
74	539.98	435.30	788.42	634.44	930.10	749.40
75	599.54	476.34	870.56	691.94	999.98	802.80
76	669.34	529.72	956.78	757.64	999.98	868.48
77	747.36	597.48	999.98	847.96	999.98	954.74
78	827.42	659.08	999.98	921.88	999.98	999.98
79	899.30	724.78	999.98	999.98	999.98	999.98

EXHIBIT XIV

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	36.96	26.68	65.72	47.22	82.14	59.54
41	36.96	26.68	65.72	47.22	82.14	59.54
42	36.96	26.68	65.72	47.22	82.14	59.54
43	36.96	26.68	65.72	47.22	82.14	59.54
44	36.96	26.68	65.72	47.22	82.14	59.54
45	36.96	26.68	65.72	47.22	82.14	59.54
46	39.00	28.76	67.76	49.26	86.22	61.60
47	41.08	28.76	69.80	49.26	88.30	63.64
48	41.08	28.76	69.80	51.34	88.30	63.64
49	41.08	30.80	71.88	53.38	90.34	65.72
50	43.12	30.80	73.92	53.38	92.40	65.72
51	45.18	32.84	75.96	57.50	100.62	71.88
52	47.22	32.84	78.04	57.50	102.64	73.92
53	49.26	34.92	82.14	59.54	104.72	75.96
54	53.38	36.96	86.22	61.60	110.88	80.06
55	57.50	41.08	94.46	67.76	123.22	88.30
56	63.64	47.22	104.72	75.96	133.46	98.56
57	69.80	51.34	112.90	84.18	143.72	106.78
58	78.04	57.50	125.24	90.34	158.10	114.98
59	86.22	61.60	137.56	98.56	174.52	125.24
60	96.48	71.88	151.94	114.98	190.94	143.72
61	106.78	84.18	170.40	131.40	213.54	166.32
62	119.08	90.34	184.78	141.66	234.04	176.58
63	135.50	104.72	211.46	164.26	266.92	207.36
64	151.94	114.98	236.12	178.62	299.76	225.86
65	170.40	133.46	260.76	203.28	328.50	256.64
66	184.78	141.66	279.24	215.60	353.16	271.04
67	207.36	158.10	308.00	234.04	388.06	293.60
68	227.88	176.58	336.74	260.76	420.90	326.44
69	254.62	193.02	371.64	283.34	464.00	353.16
70	281.30	213.54	408.58	310.02	507.12	386.00
71	308.00	234.04	441.42	334.68	544.12	412.68
72	340.84	258.70	482.50	367.52	585.14	445.56
73	377.78	289.50	527.68	406.54	632.38	486.62
74	414.74	320.32	576.96	445.56	681.68	525.62
75	461.98	351.10	638.52	484.56	739.16	560.54
76	515.36	390.10	700.14	529.72	804.84	607.76
77	574.88	439.40	776.08	593.38	874.64	667.28
78	636.50	484.56	847.96	644.70	942.42	718.62
79	691.94	533.84	913.66	704.24	999.98	767.90
80		581.04		755.58		819.22
81		630.34		813.08		872.62
82		687.82		872.62		934.20
83		749.40		944.48		999.88
84		811.00		999.98		999.98

EXHIBIT XIV

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	32.84	24.66	57.50	43.12	71.88	53.38
41	32.84	24.66	57.50	43.12	71.88	53.38
42	32.84	24.66	57.50	43.12	71.88	53.38
43	32.84	24.66	57.50	43.12	71.88	53.38
44	32.84	24.66	57.50	43.12	71.88	53.38
45	32.84	24.66	57.50	43.12	71.88	53.38
46	34.92	26.68	59.54	45.18	75.96	57.50
47	34.92	26.68	61.60	47.22	78.04	59.54
48	36.96	26.68	63.64	47.22	80.06	59.54
49	36.96	28.76	63.64	49.26	80.06	61.60
50	39.00	28.76	65.72	49.26	82.14	61.60
51	41.08	30.80	67.76	51.34	86.22	67.76
52	41.08	30.80	69.80	53.38	88.30	69.80
53	45.18	32.84	73.92	55.44	94.46	73.92
54	47.22	34.92	78.04	59.54	98.56	75.96
55	51.34	39.00	84.18	63.64	108.82	82.14
56	57.50	43.12	92.40	71.88	119.08	90.34
57	63.64	49.26	100.62	78.04	129.36	100.62
58	69.80	53.38	112.90	86.22	143.72	108.82
59	78.04	59.54	123.22	94.46	158.10	119.08
60	86.22	67.76	135.50	106.78	172.48	135.50
61	96.48	78.04	151.94	123.22	190.94	153.98
62	106.78	84.18	166.32	131.40	211.46	166.32
63	123.22	98.56	193.02	156.06	242.28	195.04
64	137.56	108.82	213.54	168.36	268.96	211.46
65	151.94	125.24	234.04	190.94	293.60	240.22
66	166.32	133.46	250.50	201.20	314.16	252.54
67	186.86	147.82	277.18	219.70	349.02	277.18
68	207.36	168.36	303.88	246.38	379.84	310.02
69	229.96	182.74	334.68	266.92	416.80	332.60
70	252.54	201.20	367.52	291.54	455.82	361.36
71	275.12	217.62	394.22	312.08	484.56	383.94
72	305.92	244.32	435.30	347.00	527.68	418.86
73	340.84	275.12	478.40	383.94	574.88	461.98
74	373.68	299.76	519.46	418.86	611.84	492.78
75	414.74	328.50	572.84	453.74	663.18	527.68
76	459.90	363.42	624.18	494.82	716.56	566.70
77	517.40	414.74	700.14	558.46	788.42	630.34
78	576.96	459.90	767.90	611.84	854.12	679.60
79	622.10	500.98	821.28	661.12	905.46	726.82
80		537.94		700.14		772.00
81		581.04		749.40		823.34
82		624.18		798.68		876.72
83		665.26		845.92		925.98
84		702.20		886.98		973.20

EXHIBIT XIV

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	28.76	20.52	49.26	36.96	61.60	45.18
41	28.76	20.52	49.26	36.96	61.60	45.18
42	28.76	20.52	49.26	36.96	61.60	45.18
43	28.76	20.52	49.26	36.96	61.60	45.18
44	28.76	20.52	49.26	36.96	61.60	45.18
45	28.76	20.52	49.26	36.96	61.60	45.18
46	28.76	22.58	51.34	39.00	63.64	47.22
47	30.80	22.58	53.38	39.00	65.72	49.26
48	30.80	22.58	53.38	39.00	65.72	49.26
49	30.80	22.58	53.38	39.00	67.76	51.34
50	32.84	24.66	55.44	41.08	69.80	55.44
51	32.84	24.66	57.50	43.12	71.88	57.50
52	34.92	26.68	59.54	45.18	75.96	59.54
53	36.96	28.76	61.60	47.22	78.04	61.60
54	39.00	28.76	65.72	49.26	84.18	61.60
55	43.12	32.84	71.88	53.38	92.40	69.80
56	49.26	34.92	80.06	57.50	102.64	73.92
57	53.38	41.08	86.22	65.72	110.88	84.18
58	59.54	45.18	94.46	71.88	121.14	92.40
59	65.72	49.26	104.72	80.06	131.40	100.62
60	75.96	55.44	119.08	88.30	149.90	110.88
61	82.14	61.60	129.36	96.48	162.20	121.14
62	92.40	69.80	145.78	110.88	184.78	139.64
63	104.72	75.96	162.20	119.08	205.32	149.90
64	121.14	86.22	186.86	135.50	236.12	170.40
65	133.46	96.48	203.28	147.82	256.64	186.86
66	149.90	106.78	225.86	162.20	283.34	203.28
67	164.26	117.04	244.32	172.48	308.00	217.62
68	180.68	131.40	266.92	193.02	332.60	240.22
69	197.12	141.66	287.46	205.32	359.30	256.64
70	213.54	156.06	308.00	225.86	381.90	279.24
71	234.04	170.40	334.68	242.28	412.68	297.72
72	254.62	184.78	361.36	262.80	439.40	318.26
73	277.18	203.28	386.00	285.40	464.00	342.86
74	303.88	223.80	420.90	310.02	496.86	365.48
75	334.68	242.28	461.98	334.68	533.84	388.06
76	369.58	268.96	503.04	365.48	579.00	418.86
77	410.64	299.76	554.36	404.48	622.10	455.82
78	451.72	330.58	601.58	441.42	669.34	490.70
79	494.82	361.36	654.94	476.34	714.52	529.72
80		394.22		513.30		568.72
81		431.16		554.36		613.92
82		470.16		597.48		661.12
83		513.30		644.70		710.40
84		560.54		696.02		763.80

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	54.30	40.16	101.54	75.58	127.52	94.46
41	54.30	40.16	101.54	75.58	127.52	94.46
42	54.30	40.16	101.54	75.58	127.52	94.46
43	54.30	40.16	101.54	75.58	127.52	94.46
44	54.30	40.16	101.54	75.58	127.52	94.46
45	54.30	40.16	101.54	75.58	127.52	94.46
46	59.04	44.86	106.26	80.28	134.60	101.54
47	59.04	44.86	108.62	80.28	136.94	101.54
48	61.38	44.86	110.96	82.66	139.32	103.90
49	61.38	47.24	110.96	85.00	141.70	106.26
50	63.76	47.24	113.34	85.00	144.02	108.62
51	66.12	49.58	118.04	89.74	148.76	113.34
52	70.84	51.96	122.80	92.06	155.82	118.04
53	73.18	54.30	127.52	96.80	162.90	122.80
54	77.92	59.04	134.60	101.54	172.38	129.84
55	87.36	66.12	148.76	113.34	191.26	144.02
56	94.46	73.18	162.90	125.14	207.78	162.90
57	103.90	80.28	177.08	136.94	226.68	174.74
58	115.72	89.74	195.96	148.76	247.94	191.26
59	129.84	96.80	214.88	162.90	273.90	207.78
60	144.02	113.34	236.12	186.54	299.88	236.12
61	160.58	129.84	266.82	217.24	335.28	271.54
62	177.08	139.32	290.42	231.38	368.36	290.42
63	203.06	165.28	332.92	269.14	420.30	340.00
64	229.06	179.46	373.08	292.82	469.86	370.70
65	255.02	207.78	408.46	332.92	514.72	420.30
66	278.62	221.98	439.18	351.80	554.88	443.90
67	309.30	245.58	484.04	384.88	606.84	481.68
68	340.00	278.62	526.54	429.74	658.76	536.00
69	382.50	302.22	585.58	465.16	729.60	578.50
70	422.64	335.28	642.22	510.00	795.74	632.82
71	462.80	366.00	694.18	550.16	852.38	677.64
72	507.64	403.76	757.94	604.46	918.48	731.98
73	564.30	453.36	828.76	665.86	994.04	800.42
74	620.98	500.60	906.68	729.60	999.98	861.82
75	689.48	547.80	999.98	795.74	999.98	923.22
76	769.74	609.18	999.98	871.28	999.98	998.76
77	859.46	687.10	999.98	975.16	999.98	999.98
78	951.54	757.94	999.98	999.98	999.98	999.98
79	999.98	833.50	999.98	999.98	999.98	999.98

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	42.50	30.68	75.58	54.30	94.46	68.48
41	42.50	30.68	75.58	54.30	94.46	68.48
42	42.50	30.68	75.58	54.30	94.46	68.48
43	42.50	30.68	75.58	54.30	94.46	68.48
44	42.50	30.68	75.58	54.30	94.46	68.48
45	42.50	30.68	75.58	54.30	94.46	68.48
46	44.86	33.08	77.92	56.64	99.16	70.84
47	47.24	33.08	80.28	56.64	101.54	73.18
48	47.24	33.08	80.28	59.04	101.54	73.18
49	47.24	35.42	82.66	61.38	103.90	75.58
50	49.58	35.42	85.00	61.38	106.26	75.58
51	51.96	37.76	87.36	66.12	115.72	82.66
52	54.30	37.76	89.74	66.12	118.04	85.00
53	56.64	40.16	94.46	68.48	120.42	87.36
54	61.38	42.50	99.16	70.84	127.52	92.06
55	66.12	47.24	108.62	77.92	141.70	101.54
56	73.18	54.30	120.42	87.36	153.48	113.34
57	80.28	59.04	129.84	96.80	165.28	122.80
58	89.74	66.12	144.02	103.90	181.82	132.22
59	99.16	70.84	158.20	113.34	200.70	144.02
60	110.96	82.66	174.74	132.22	219.58	165.28
61	122.80	96.80	195.96	151.12	245.58	191.26
62	136.94	103.90	212.50	162.90	269.14	203.06
63	155.82	120.42	243.18	188.90	306.96	238.46
64	174.74	132.22	271.54	205.42	344.72	259.74
65	195.96	153.48	299.88	233.78	377.78	295.14
66	212.50	162.90	321.12	247.94	406.14	311.70
67	238.46	181.82	354.20	269.14	446.26	337.64
68	262.06	203.06	387.26	299.88	484.04	375.40
69	292.82	221.98	427.38	325.84	533.60	406.14
70	323.50	245.58	469.86	356.52	583.18	443.90
71	354.20	269.14	507.64	384.88	625.74	474.58
72	391.96	297.50	554.88	422.64	672.92	512.40
73	434.44	332.92	606.84	467.52	727.24	559.62
74	476.96	368.36	663.50	512.40	783.94	604.46
75	531.28	403.76	734.30	557.24	850.04	644.62
76	592.66	448.62	805.16	609.18	925.56	698.92
77	661.12	505.32	892.50	682.38	999.98	767.38
78	731.98	557.24	975.16	741.40	999.98	826.42
79	795.74	613.92	999.98	809.88	999.98	883.08
80		668.20		868.92		942.10
81		724.90		935.04		999.98
82		791.00		999.98		999.98
83		861.82		999.98		999.98
84		932.66		999.98		999.98

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	37.76	28.36	66.12	49.58	82.66	61.38
41	37.76	28.36	66.12	49.58	82.66	61.38
42	37.76	28.36	66.12	49.58	82.66	61.38
43	37.76	28.36	66.12	49.58	82.66	61.38
44	37.76	28.36	66.12	49.58	82.66	61.38
45	37.76	28.36	66.12	49.58	82.66	61.38
46	40.16	30.68	68.48	51.96	87.36	66.12
47	40.16	30.68	70.84	54.30	89.74	68.48
48	42.50	30.68	73.18	54.30	92.06	68.48
49	42.50	33.08	73.18	56.64	92.06	70.84
50	44.86	33.08	75.58	56.64	94.46	70.84
51	47.24	35.42	77.92	59.04	99.16	77.92
52	47.24	35.42	80.28	61.38	101.54	80.28
53	51.96	37.76	85.00	63.76	108.62	85.00
54	54.30	40.16	89.74	68.48	113.34	87.36
55	59.04	44.86	96.80	73.18	125.14	94.46
56	66.12	49.58	106.26	82.66	136.94	103.90
57	73.18	56.64	115.72	89.74	148.76	115.72
58	80.28	61.38	129.84	99.16	165.28	125.14
59	89.74	68.48	141.70	108.62	181.82	136.94
60	99.16	77.92	155.82	122.80	198.36	155.82
61	110.96	89.74	174.74	141.70	219.58	177.08
62	122.80	96.80	191.26	151.12	243.18	191.26
63	141.70	113.34	221.98	179.46	278.62	224.30
64	158.20	125.14	245.58	193.62	309.30	243.18
65	174.74	144.02	269.14	219.58	337.64	276.26
66	191.26	153.48	288.08	231.38	361.28	290.42
67	214.88	170.00	318.76	252.66	401.38	318.76
68	238.46	193.62	349.46	283.34	436.82	356.52
69	264.46	210.16	384.88	306.96	479.32	382.50
70	290.42	231.38	422.64	335.28	524.20	415.56
71	316.38	250.26	453.36	358.90	557.24	441.54
72	351.80	280.96	500.60	399.06	606.84	481.68
73	391.96	316.38	550.16	441.54	661.12	531.28
74	429.74	344.72	597.38	481.68	703.62	566.70
75	476.96	377.78	658.76	521.80	762.66	606.84
76	528.88	417.94	717.80	569.04	824.04	651.70
77	595.02	476.96	805.16	642.22	906.68	724.90
78	663.50	528.88	883.08	703.62	982.24	781.54
79	715.42	576.12	944.48	760.28	999.98	835.84
80		618.64		805.16		887.80
81		668.20		861.82		946.84
82		717.80		918.48		999.98
83		765.04		972.80		999.98
84		807.54		999.98		999.98

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	33.08	23.60	56.64	42.50	70.84	51.96
41	33.08	23.60	56.64	42.50	70.84	51.96
42	33.08	23.60	56.64	42.50	70.84	51.96
43	33.08	23.60	56.64	42.50	70.84	51.96
44	33.08	23.60	56.64	42.50	70.84	51.96
45	33.08	23.60	56.64	42.50	70.84	51.96
46	33.08	25.96	59.04	44.86	73.18	54.30
47	35.42	25.96	61.38	44.86	75.58	56.64
48	35.42	25.96	61.38	44.86	75.58	56.64
49	35.42	25.96	61.38	44.86	77.92	59.04
50	37.76	28.36	63.76	47.24	80.28	63.76
51	37.76	28.36	66.12	49.58	82.66	66.12
52	40.16	30.68	68.48	51.96	87.36	68.48
53	42.50	33.08	70.84	54.30	89.74	70.84
54	44.86	33.08	75.58	56.64	96.80	70.84
55	49.58	37.76	82.66	61.38	106.26	80.28
56	56.64	40.16	92.06	66.12	118.04	85.00
57	61.38	47.24	99.16	75.58	127.52	96.80
58	68.48	51.96	108.62	82.66	139.32	106.26
59	75.58	56.64	120.42	92.06	151.12	115.72
60	87.36	63.76	136.94	101.54	172.38	127.52
61	94.46	70.84	148.76	110.96	186.54	139.32
62	106.26	80.28	167.64	127.52	212.50	160.58
63	120.42	87.36	186.54	136.94	236.12	172.38
64	139.32	99.16	214.88	155.82	271.54	195.96
65	153.48	110.96	233.78	170.00	295.14	214.88
66	172.38	122.80	259.74	186.54	325.84	233.78
67	188.90	134.60	280.96	198.36	354.20	250.26
68	207.78	151.12	306.96	221.98	382.50	276.26
69	226.68	162.90	330.58	236.12	413.20	295.14
70	245.58	179.46	354.20	259.74	439.18	321.12
71	269.14	195.96	384.88	278.62	474.58	342.38
72	292.82	212.50	415.56	302.22	505.32	366.00
73	318.76	233.78	443.90	328.22	533.60	394.28
74	349.46	257.38	484.04	356.52	571.38	420.30
75	384.88	278.62	531.28	384.88	613.92	446.26
76	425.02	309.30	578.50	420.30	665.86	481.68
77	472.24	344.72	637.52	465.16	715.42	524.20
78	519.48	380.16	691.82	507.64	769.74	564.30
79	569.04	415.56	753.18	547.80	821.70	609.18
80		453.36		590.30		654.02
81		495.84		637.52		706.00
82		540.68		687.10		760.28
83		590.30		741.40		816.96
84		644.62		800.42		878.38

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	54.30	40.16	101.54	75.58	127.52	94.46
41	54.30	40.16	101.54	75.58	127.52	94.46
42	54.30	40.16	101.54	75.58	127.52	94.46
43	54.30	40.16	101.54	75.58	127.52	94.46
44	54.30	40.16	101.54	75.58	127.52	94.46
45	54.30	40.16	101.54	75.58	127.52	94.46
46	59.04	44.86	106.26	80.28	134.60	101.54
47	59.04	44.86	108.62	80.28	136.94	101.54
48	61.38	44.86	110.96	82.66	139.32	103.90
49	61.38	47.24	110.96	85.00	141.70	106.26
50	63.76	47.24	113.34	85.00	144.02	108.62
51	66.12	49.58	118.04	89.74	148.76	113.34
52	70.84	51.96	122.80	92.06	155.82	118.04
53	73.18	54.30	127.52	96.80	162.90	122.80
54	77.92	59.04	134.60	101.54	172.38	129.84
55	87.36	66.12	148.76	113.34	191.26	144.02
56	94.46	73.18	162.90	125.14	207.78	162.90
57	103.90	80.28	177.08	136.94	226.68	174.74
58	115.72	89.74	195.96	148.76	247.94	191.26
59	129.84	96.80	214.88	162.90	273.90	207.78
60	144.02	113.34	236.12	186.54	299.88	236.12
61	160.58	129.84	266.82	217.24	335.28	271.54
62	177.08	139.32	290.42	231.38	368.36	290.42
63	203.06	165.28	332.92	269.14	420.30	340.00
64	229.06	179.46	373.08	292.82	469.86	370.70
65	255.02	207.78	408.46	332.92	514.72	420.30
66	278.62	221.98	439.18	351.80	554.88	443.90
67	309.30	245.58	484.04	384.88	606.84	481.68
68	340.00	278.62	526.54	429.74	658.76	536.00
69	382.50	302.22	585.58	465.16	729.60	578.50
70	422.64	335.28	642.22	510.00	795.74	632.82
71	462.80	366.00	694.18	550.16	852.38	677.64
72	507.64	403.76	757.94	604.46	918.48	731.98
73	564.30	453.36	828.76	665.86	994.04	800.42
74	620.98	500.60	906.68	729.60	999.98	861.82
75	689.48	547.80	999.98	795.74	999.98	923.22
76	769.74	609.18	999.98	871.28	999.98	998.76
77	859.46	687.10	999.98	975.16	999.98	999.98
78	951.54	757.94	999.98	999.98	999.98	999.98
79	999.98	833.50	999.98	999.98	999.98	999.98

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	42.50	30.68	75.58	54.30	94.46	68.48
41	42.50	30.68	75.58	54.30	94.46	68.48
42	42.50	30.68	75.58	54.30	94.46	68.48
43	42.50	30.68	75.58	54.30	94.46	68.48
44	42.50	30.68	75.58	54.30	94.46	68.48
45	42.50	30.68	75.58	54.30	94.46	68.48
46	44.86	33.08	77.92	56.64	99.16	70.84
47	47.24	33.08	80.28	56.64	101.54	73.18
48	47.24	33.08	80.28	59.04	101.54	73.18
49	47.24	35.42	82.66	61.38	103.90	75.58
50	49.58	35.42	85.00	61.38	106.26	75.58
51	51.96	37.76	87.36	66.12	115.72	82.66
52	54.30	37.76	89.74	66.12	118.04	85.00
53	56.64	40.16	94.46	68.48	120.42	87.36
54	61.38	42.50	99.16	70.84	127.52	92.06
55	66.12	47.24	108.62	77.92	141.70	101.54
56	73.18	54.30	120.42	87.36	153.48	113.34
57	80.28	59.04	129.84	96.80	165.28	122.80
58	89.74	66.12	144.02	103.90	181.82	132.22
59	99.16	70.84	158.20	113.34	200.70	144.02
60	110.96	82.66	174.74	132.22	219.58	165.28
61	122.80	96.80	195.96	151.12	245.58	191.26
62	136.94	103.90	212.50	162.90	269.14	203.06
63	155.82	120.42	243.18	188.90	306.96	238.46
64	174.74	132.22	271.54	205.42	344.72	259.74
65	195.96	153.48	299.88	233.78	377.78	295.14
66	212.50	162.90	321.12	247.94	406.14	311.70
67	238.46	181.82	354.20	269.14	446.26	337.64
68	262.06	203.06	387.26	299.88	484.04	375.40
69	292.82	221.98	427.38	325.84	533.60	406.14
70	323.50	245.58	469.86	356.52	583.18	443.90
71	354.20	269.14	507.64	384.88	625.74	474.58
72	391.96	297.50	554.88	422.64	672.92	512.40
73	434.44	332.92	606.84	467.52	727.24	559.62
74	476.96	368.36	663.50	512.40	783.94	604.46
75	531.28	403.76	734.30	557.24	850.04	644.62
76	592.66	448.62	805.16	609.18	925.56	698.92
77	661.12	505.32	892.50	682.38	999.98	767.38
78	731.98	557.24	975.16	741.40	999.98	826.42
79	795.74	613.92	999.98	809.88	999.98	883.08
80		668.20		868.92		942.10
81		724.90		935.04		999.98
82		791.00		999.98		999.98
83		861.82		999.98		999.98
84		932.66		999.98		999.98

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	37.76	28.36	66.12	49.58	82.66	61.38
41	37.76	28.36	66.12	49.58	82.66	61.38
42	37.76	28.36	66.12	49.58	82.66	61.38
43	37.76	28.36	66.12	49.58	82.66	61.38
44	37.76	28.36	66.12	49.58	82.66	61.38
45	37.76	28.36	66.12	49.58	82.66	61.38
46	40.16	30.68	68.48	51.96	87.36	66.12
47	40.16	30.68	70.84	54.30	89.74	68.48
48	42.50	30.68	73.18	54.30	92.06	68.48
49	42.50	33.08	73.18	56.64	92.06	70.84
50	44.86	33.08	75.58	56.64	94.46	70.84
51	47.24	35.42	77.92	59.04	99.16	77.92
52	47.24	35.42	80.28	61.38	101.54	80.28
53	51.96	37.76	85.00	63.76	108.62	85.00
54	54.30	40.16	89.74	68.48	113.34	87.36
55	59.04	44.86	96.80	73.18	125.14	94.46
56	66.12	49.58	106.26	82.66	136.94	103.90
57	73.18	56.64	115.72	89.74	148.76	115.72
58	80.28	61.38	129.84	99.16	165.28	125.14
59	89.74	68.48	141.70	108.62	181.82	136.94
60	99.16	77.92	155.82	122.80	198.36	155.82
61	110.96	89.74	174.74	141.70	219.58	177.08
62	122.80	96.80	191.26	151.12	243.18	191.26
63	141.70	113.34	221.98	179.46	278.62	224.30
64	158.20	125.14	245.58	193.62	309.30	243.18
65	174.74	144.02	269.14	219.58	337.64	276.26
66	191.26	153.48	288.08	231.38	361.28	290.42
67	214.88	170.00	318.76	252.66	401.38	318.76
68	238.46	193.62	349.46	283.34	436.82	356.52
69	264.46	210.16	384.88	306.96	479.32	382.50
70	290.42	231.38	422.64	335.28	524.20	415.56
71	316.38	250.26	453.36	358.90	557.24	441.54
72	351.80	280.96	500.60	399.06	606.84	481.68
73	391.96	316.38	550.16	441.54	661.12	531.28
74	429.74	344.72	597.38	481.68	703.62	566.70
75	476.96	377.78	658.76	521.80	762.66	606.84
76	528.88	417.94	717.80	569.04	824.04	651.70
77	595.02	476.96	805.16	642.22	906.68	724.90
78	663.50	528.88	883.08	703.62	982.24	781.54
79	715.42	576.12	944.48	760.28	999.98	835.84
80		618.64		805.16		887.80
81		668.20		861.82		946.84
82		717.80		918.48		999.98
83		765.04		972.80		999.98
84		807.54		999.98		999.98

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	33.08	23.60	56.64	42.50	70.84	51.96
41	33.08	23.60	56.64	42.50	70.84	51.96
42	33.08	23.60	56.64	42.50	70.84	51.96
43	33.08	23.60	56.64	42.50	70.84	51.96
44	33.08	23.60	56.64	42.50	70.84	51.96
45	33.08	23.60	56.64	42.50	70.84	51.96
46	33.08	25.96	59.04	44.86	73.18	54.30
47	35.42	25.96	61.38	44.86	75.58	56.64
48	35.42	25.96	61.38	44.86	75.58	56.64
49	35.42	25.96	61.38	44.86	77.92	59.04
50	37.76	28.36	63.76	47.24	80.28	63.76
51	37.76	28.36	66.12	49.58	82.66	66.12
52	40.16	30.68	68.48	51.96	87.36	68.48
53	42.50	33.08	70.84	54.30	89.74	70.84
54	44.86	33.08	75.58	56.64	96.80	70.84
55	49.58	37.76	82.66	61.38	106.26	80.28
56	56.64	40.16	92.06	66.12	118.04	85.00
57	61.38	47.24	99.16	75.58	127.52	96.80
58	68.48	51.96	108.62	82.66	139.32	106.26
59	75.58	56.64	120.42	92.06	151.12	115.72
60	87.36	63.76	136.94	101.54	172.38	127.52
61	94.46	70.84	148.76	110.96	186.54	139.32
62	106.26	80.28	167.64	127.52	212.50	160.58
63	120.42	87.36	186.54	136.94	236.12	172.38
64	139.32	99.16	214.88	155.82	271.54	195.96
65	153.48	110.96	233.78	170.00	295.14	214.88
66	172.38	122.80	259.74	186.54	325.84	233.78
67	188.90	134.60	280.96	198.36	354.20	250.26
68	207.78	151.12	306.96	221.98	382.50	276.26
69	226.68	162.90	330.58	236.12	413.20	295.14
70	245.58	179.46	354.20	259.74	439.18	321.12
71	269.14	195.96	384.88	278.62	474.58	342.38
72	292.82	212.50	415.56	302.22	505.32	366.00
73	318.76	233.78	443.90	328.22	533.60	394.28
74	349.46	257.38	484.04	356.52	571.38	420.30
75	384.88	278.62	531.28	384.88	613.92	446.26
76	425.02	309.30	578.50	420.30	665.86	481.68
77	472.24	344.72	637.52	465.16	715.42	524.20
78	519.48	380.16	691.82	507.64	769.74	564.30
79	569.04	415.56	753.18	547.80	821.70	609.18
80		453.36		590.30		654.02
81		495.84		637.52		706.00
82		540.68		687.10		760.28
83		590.30		741.40		816.96
84		644.62		800.42		878.38

RIVERSOURCE LIFE INSURANCE COMPANY

Address: 227 Ameriprise Financial Center, Minneapolis MN 55474

Actuarial Memorandum for 30225 Series

January 2014

Policy form 30225-VA is an individual policy form providing benefits to individuals for confinement in a nursing home. This form was issued in Virginia from January 15, 1993 through January 15, 2001.

1. Purpose of Filing

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

2. Description of Benefits

This is an individually underwritten policy form which pays a daily benefit for confinement in a nursing home. Benefits are payable under skilled, intermediate or custodial levels of care. Hospital confinement is not a pre-requisite for benefit entitlement.

The confinement daily benefit is selected at issue. The maximum period for which confinement benefits are payable is also selected at issue. The choices are: 730 days (2 years), 1,095 days (3 years), 1,460 days (4 years), and unlimited. This policy also pays 60% of the confinement daily benefit for stays in a qualified Assisted Living Facility (ALF). A qualified ALF is one that has a minimum of 10 inpatients and has a 24-hour awake, trained, and ready to respond staff.

Confinement benefit payments commence after an elimination period of 20 days or 100 days, depending on the plan initially chosen. During the continuation of confinement benefit payments, the premiums are waived after 90 days.

Benefit eligibility for nursing home coverage is based on any one of the following: sickness or injury (1996 and prior issues only), 2 or more Activities of Daily Living (ADL) deficiencies out of 5 ADLs, or cognitive impairment. As defined in the policy, the 5 ADLs are: Continence, Dressing, Feeding, Toileting, and Transferring. Benefit eligibility for ALF coverage is based on 2 or more out of 5 ADL deficiencies or cognitive impairment.

If temporary hospitalization is required during a period of confinement in a nursing home or an ALF, and there is a charge for reserving a bed in the facility, this policy will pay the daily benefit for up to 21 days during any confinement period.

At issue, the insured may choose to elect either the Simple Benefit Increase Option or the Compound Benefit Increase Option. The Simple Benefit Increase Option will increase the original daily limits by a fixed amount (5% of the original maximum daily benefits) each year from the second year on for life. The Compound Benefit Increase Option will increase the previous year's daily limits by 5% per year from the second year on for life. The increasing benefits apply even when the policy is in claim status.

3. Renewability

This policy form is guaranteed renewable for life.

4. Applicability

This filing is applicable to inforce policies only, as this policy form is no longer being sold in the market. The premium changes will apply to the base form but not the optional home care rider or the optional nonforfeiture benefit 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.

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

Starting in 1989, RiverSource Life marketed nursing home policies with a zero day prior hospitalization requirement. Using the emerging experience on this business, statistics from the "1985 National Nursing Home Survey" published by the National Center for Health Statistics, and input provided from RiverSource Life's reinsurer, both the expected frequencies and expected severities of claims for the non-increasing benefit were developed. It should be noted that considerable judgment was made with regard to the frequency and severity of claims, especially for the ALF benefit.

Claim costs for the Benefit Increase Options are based on these claim costs with the benefit loaded to reflect the scheduled increases in benefits.

Actual-to-expected adjustment factors were developed from actual emerging experience through anniversaries ending December 2012 and are shown in the following tables:

RIVERSOURCE LIFE INSURANCE COMPANY

Address: 227 Ameriprise Financial Center, Minneapolis MN 55474

Actuarial Memorandum for 30225 Series

January 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	0.05	0.40	1.00	0.90	1.00	1.00	1.85
2	0.10	0.45	1.00	0.95	1.00	2.40	1.85
3	0.15	0.45	1.00	1.40	1.50	2.40	1.85
4	0.20	0.45	1.00	1.40	2.00	2.15	1.85
5	0.25	0.55	1.00	1.40	2.00	2.15	1.85
6	0.30	0.55	1.00	1.40	2.00	2.00	1.85
7	0.35	0.55	1.00	1.40	2.00	2.00	1.85
8	0.40	0.55	1.00	1.40	2.00	1.70	1.85
9	0.45	0.60	1.00	1.40	1.75	1.75	1.85
10	0.45	0.65	1.00	1.40	1.60	1.75	1.85
11	0.45	0.65	1.00	1.40	1.60	1.85	1.85
12	0.55	0.65	1.00	1.40	1.60	1.70	1.85
13	0.55	0.65	1.00	1.40	1.60	1.70	1.85
14	0.55	0.65	1.00	1.40	1.60	1.70	1.85
15	0.65	0.70	1.10	1.40	1.60	1.70	1.85
16	0.65	0.70	1.15	1.40	1.60	1.70	1.85
17	0.65	0.70	1.15	1.40	1.60	1.70	1.85
18	0.70	0.70	1.15	1.40	1.60	1.70	1.85
19	0.70	0.70	1.15	1.40	1.60	1.70	1.85
20	0.75	0.75	1.15	1.40	1.60	1.70	1.85
21	0.75	0.75	1.20	1.40	1.60	1.70	1.85
22	0.75	0.75	1.20	1.40	1.60	1.70	1.85
23	0.75	0.80	1.20	1.40	1.60	1.70	1.85
24	0.80	0.80	1.25	1.40	1.60	1.70	1.85
25	0.80	0.85	1.25	1.40	1.60	1.70	1.85
26	0.85	0.85	1.25	1.40	1.60	1.70	1.85
27	0.85	0.90	1.25	1.40	1.60	1.70	1.85
28	0.85	0.90	1.25	1.40	1.60	1.70	1.85
29	0.90	0.95	1.25	1.40	1.60	1.70	1.85
30+	1.00	1.00	1.25	1.40	1.60	1.70	1.85

RIVERSOURCE LIFE INSURANCE COMPANY

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Actuarial Memorandum for 30225 Series

January 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	0.10	0.30	0.55	0.45	0.70	1.35	1.00	2.00
2	0.10	0.30	0.55	0.50	0.75	1.35	1.00	2.00
3	0.10	0.30	0.55	0.75	0.80	1.35	1.90	2.00
4	0.20	0.30	0.60	0.75	0.85	1.35	1.90	2.00
5	0.20	0.30	0.60	0.75	0.90	1.35	1.90	2.00
6	0.20	0.30	0.70	0.75	0.95	1.35	1.90	2.00
7	0.30	0.30	0.70	0.75	1.00	1.35	1.50	2.00
8	0.35	0.30	0.70	0.75	1.05	1.35	1.50	1.50
9	0.40	0.30	0.70	0.75	1.05	1.35	1.50	1.50
10	0.40	0.30	0.70	1.00	1.10	1.35	1.50	1.50
11	0.45	0.30	0.70	1.00	1.10	1.35	1.50	1.75
12	0.45	0.35	0.70	1.05	1.15	1.35	1.50	1.75
13	0.45	0.40	0.70	1.05	1.15	1.35	1.50	1.75
14	0.45	0.45	0.90	1.05	1.20	1.35	1.50	1.75
15	0.45	0.55	0.95	1.10	1.20	1.40	1.50	1.90
16	0.45	0.65	1.00	1.10	1.20	1.40	1.50	1.90
17	0.45	0.65	1.00	1.10	1.30	1.40	1.50	1.90
18	0.50	0.75	1.00	1.15	1.35	1.40	1.50	1.90
19	0.50	0.75	1.00	1.15	1.35	1.40	1.50	1.90
20	0.55	0.75	1.00	1.15	1.35	1.40	1.50	1.90
21	0.60	0.75	1.00	1.15	1.35	1.40	1.50	2.00
22	0.65	0.75	1.00	1.15	1.35	1.40	1.50	2.00
23	0.70	0.75	1.00	1.15	1.35	1.40	1.50	2.00
24	0.75	0.75	1.00	1.15	1.35	1.40	1.50	2.00
25	0.75	0.85	1.00	1.15	1.35	1.40	1.50	2.00
26	0.80	0.85	1.00	1.15	1.35	1.40	1.50	2.00
27	0.90	0.85	1.00	1.15	1.35	1.40	1.50	2.00
28	0.90	0.90	1.00	1.15	1.35	1.40	1.50	2.00
29	0.95	0.95	1.00	1.15	1.35	1.40	1.50	2.00
30	0.95	0.95	1.00	1.15	1.35	1.40	1.50	2.00
31	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
32	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
33	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
34	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
35+	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00

Morbidity used in the projections has also been reduced by 5% for anticipated improved claim experience from changes in claim management starting in 2003.

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 100.3%. This experience is based on 7,490 actual claims (4,047 lifetime and 3,743 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 30225, 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.

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.

<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 2012. 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 was used in the development of the current selection factors, subject to the constraints that the factors must be non-decreasing by duration and cannot exceed 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 23 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 36,342 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 1.3% of inforce policyholders is assumed to lapse, and a 0.7% 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 2012. 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 34,804 lapses, including 10,269 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 2.0% in the year of rate increase notification to policyholders grading down to 0% in the 3rd 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, 2011 and 2013 so that total commissions paid before and after 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 this particular policy form; 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 2007 rate increase filing, Exhibit VIII provides the

assumptions used in the 2009 rate increase filing and Exhibit IX provides the assumptions used in the 2011 rate increase filing.

6. Marketing Method

This policy form was marketed by agents of RiverSource Life.

7. Underwriting Description

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

8. Premiums

Premiums are unisex and payable for life. The premiums vary by issue age, the benefit limit, the initial daily benefit, the elimination period, and the Benefit Increase Option.

9. Issue Age Range

The issue ages are from 40 to 79 except for the benefit structure with 100-day elimination period, non-lifetime benefits, 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 9/30/2013) are applied to the annual premium (AP):

Premium Mode	Modal Factors	Percent Distribution
Annual	1.0000*AP + 0.0	42.8%
Semi-Annual	0.5020*AP+ 0.4	9.3%
Quarterly	0.2580*AP+ 0.5	8.5%
Monthly	0.0868*AP+ 0.6	39.4%

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 XII and XIII.

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 30225 is shown in Exhibit X, and Virginia experience for policy form 30225-VA is shown in Exhibit XI. Exhibit XII shows nationwide past experience including earned premiums, incurred claims, increase in active life reserves and incurred loss ratios by calendar year, and Exhibit XIII 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:

$$ILR_j = \frac{\sum_k \sum_t {}_jPmt_t^k * v^{t-k} + \sum_k ({}_jCR_{ValDate}^k + {}_jIBNR_{ValDate}^k) * v^{ValDate-k}}{EP_j}$$

ILR_j = incurred loss ratio for year *j*

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

${}_jCR_{ValDate}^k$ = open claim reserve held on September 30, 2013 for claims incurred at time *k* in year *j*

${}_jIBNR_{ValDate}^k$ = incurred but not reported reserve as of September 30, 2013 attributable to claims incurred at time *k* in year *j*

EP_j = earned premium in year *j*

ValDate = September 30, 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 X through XIII 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 X through XIII 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 are as of September 30, 2013 and are calculated as the sum of accumulated historical experience and discounted future experience where accumulation and discounting of the total for each calendar year occur at 5.0%, an interest rate consistent with that assumed in the determination of premiums at the time of original pricing, and assume mid-year values.

The incurred loss ratio in Exhibits XII and XIII 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

Four prior increases have been approved and implemented on this form. A 35% increase was approved in October 2005 and implemented on each contract's next policy anniversary beginning in March 2006. A 15% increase was approved in May 2008 and implemented on each contract's next policy anniversary beginning in August 2008. A 15% increase was approved in May 2009 and implemented on each contract's next policy anniversary beginning in August 2009. A 15% increase was approved in May 2012 and implemented on each contract's next policy anniversary beginning in October 2012. The actual and projected premiums in Exhibits XI and XIII reflect the impact of these increases.

The actual and projected premiums in Exhibits X and XII reflect the accumulated rate increases as approved in Virginia and implemented from 2005 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 15%.

Projected experience assuming this increase is implemented is shown in Exhibits X and XI. As shown in these exhibits, the expected lifetime loss ratio with and without the requested rate increase exceeds the minimum loss ratio of 60%.

Current rate tables for this form are included with this memorandum in Exhibit 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 September 30, 2013 Inforce)

Before increase: $1,354
After increase: $1,556

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 9/30/2013 (based on inforce count)

By Issue Age:

Issue Ages	Percent Distribution
<55	31.0%
55-59	28.0%
60-64	23.3%
65-69	11.9%
70-74	4.7%
75-79	1.0%
>79	0.1%

By Elimination Period:

Elimination Period	Percent Distribution
20-day	19.4%
100-day	80.6%

By Benefit Period:

Benefit Period	Percent Distribution
2-Year	2.3%
3-Year	8.4%
4-Year	20.8%
Unlimited	68.5%

By Inflation Protection Option:

Inflation Option	Percent Distribution
None	14.1%
Simple	39.2%
Compound	46.7%

20. Number of Policyholders

As of 9/30/2013, 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	1,944	$2,631,609
Nationwide	46,237	$66,375,111

RIVERSOURCE LIFE INSURANCE COMPANY

Address: 227 Ameriprise Financial Center, Minneapolis MN 55474

Actuarial Memorandum for 30225 Series

January 2014

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: January 10, 2014

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

Policy Form: 30225-VA

Original Pricing Assumptions

Mortality: 1983 Individual Annuitant Mortality Table

Lapse Rates:

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

Morbidity: Starting in 1989, RiverSource Life marketed nursing home policies with a zero day prior hospitalization requirement. Using the emerging experience on this business, statistics from the "1985 National Nursing Home Survey" published by the National Center for Health Statistics, and input provided from RiverSource Life's reinsurer, both the expected frequencies and expected severities of claims for the non-increasing benefit were developed. It should be noted that considerable judgment was made with regard to the frequency and severity of claims, especially for the Assisted Living Facility benefit. Claim costs for the Benefit Increase Options are based on these claim costs with the benefit loaded to reflect the scheduled increases in benefits.

The following selection factors were used:

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

Interest Rate: 5%

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

Policy Form: 30225-VA

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%	66%	71%	73%	88%
10	55%	66%	66%	74%	73%	88%
11	57%	67%	71%	78%	74%	88%
12	57%	67%	72%	78%	90%	89%
13	57%	67%	75%	83%	90%	92%
14	57%	68%	77%	89%	90%	95%
15	57%	69%	78%	90%	95%	98%
16	64%	69%	81%	90%	95%	100%
17	67%	69%	81%	91%	100%	100%
18	70%	70%	84%	95%	100%	100%
19	72%	70%	85%	96%	100%	100%
20	72%	73%	86%	97%	100%	100%
21	75%	75%	88%	100%	100%	100%
22	80%	77%	90%	100%	100%	100%
23	80%	80%	95%	100%	100%	100%
24	85%	82%	95%	100%	100%	100%
25	85%	85%	100%	100%	100%	100%
26	85%	90%	100%	100%	100%	100%
27	87%	90%	100%	100%	100%	100%
28	87%	95%	100%	100%	100%	100%
29	90%	95%	100%	100%	100%	100%
30	90%	100%	100%	100%	100%	100%
31	90%	100%	100%	100%	100%	100%
32	95%	100%	100%	100%	100%	100%
33	95%	100%	100%	100%	100%	100%
34	95%	100%	100%	100%	100%	100%
35+	100%	100%	100%	100%	100%	100%

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

Policy Form: 30225-VA

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%	1.2%	1.3%
11	0.8%	1.0%	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%	1.3%	1.8%
19	0.7%	1.3%	1.8%
20	0.8%	1.3%	1.9%
21	0.8%	1.3%	1.9%
22	0.8%	1.3%	2.0%
23	0.8%	1.3%	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 1.3% of inforce policyholders is assumed to lapse, and a 0.7% 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 Form: 30225-VA

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 2012. 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	0.05	0.40	1.00	0.90	1.00	1.00	1.85
2	0.10	0.45	1.00	0.95	1.00	2.40	1.85
3	0.15	0.45	1.00	1.40	1.50	2.40	1.85
4	0.20	0.45	1.00	1.40	2.00	2.15	1.85
5	0.25	0.55	1.00	1.40	2.00	2.15	1.85
6	0.30	0.55	1.00	1.40	2.00	2.00	1.85
7	0.35	0.55	1.00	1.40	2.00	2.00	1.85
8	0.40	0.55	1.00	1.40	2.00	1.70	1.85
9	0.45	0.60	1.00	1.40	1.75	1.75	1.85
10	0.45	0.65	1.00	1.40	1.60	1.75	1.85
11	0.45	0.65	1.00	1.40	1.60	1.85	1.85
12	0.55	0.65	1.00	1.40	1.60	1.70	1.85
13	0.55	0.65	1.00	1.40	1.60	1.70	1.85
14	0.55	0.65	1.00	1.40	1.60	1.70	1.85
15	0.65	0.70	1.10	1.40	1.60	1.70	1.85
16	0.65	0.70	1.15	1.40	1.60	1.70	1.85
17	0.65	0.70	1.15	1.40	1.60	1.70	1.85
18	0.70	0.70	1.15	1.40	1.60	1.70	1.85
19	0.70	0.70	1.15	1.40	1.60	1.70	1.85
20	0.75	0.75	1.15	1.40	1.60	1.70	1.85
21	0.75	0.75	1.20	1.40	1.60	1.70	1.85
22	0.75	0.75	1.20	1.40	1.60	1.70	1.85
23	0.75	0.80	1.20	1.40	1.60	1.70	1.85
24	0.80	0.80	1.25	1.40	1.60	1.70	1.85
25	0.80	0.85	1.25	1.40	1.60	1.70	1.85
26	0.85	0.85	1.25	1.40	1.60	1.70	1.85
27	0.85	0.90	1.25	1.40	1.60	1.70	1.85
28	0.85	0.90	1.25	1.40	1.60	1.70	1.85
29	0.90	0.95	1.25	1.40	1.60	1.70	1.85
30+	1.00	1.00	1.25	1.40	1.60	1.70	1.85

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

Policy Form: 30225-VA

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	0.10	0.30	0.55	0.45	0.70	1.35	1.00	2.00
2	0.10	0.30	0.55	0.50	0.75	1.35	1.00	2.00
3	0.10	0.30	0.55	0.75	0.80	1.35	1.90	2.00
4	0.20	0.30	0.60	0.75	0.85	1.35	1.90	2.00
5	0.20	0.30	0.60	0.75	0.90	1.35	1.90	2.00
6	0.20	0.30	0.70	0.75	0.95	1.35	1.90	2.00
7	0.30	0.30	0.70	0.75	1.00	1.35	1.50	2.00
8	0.35	0.30	0.70	0.75	1.05	1.35	1.50	1.50
9	0.40	0.30	0.70	0.75	1.05	1.35	1.50	1.50
10	0.40	0.30	0.70	1.00	1.10	1.35	1.50	1.50
11	0.45	0.30	0.70	1.00	1.10	1.35	1.50	1.75
12	0.45	0.35	0.70	1.05	1.15	1.35	1.50	1.75
13	0.45	0.40	0.70	1.05	1.15	1.35	1.50	1.75
14	0.45	0.45	0.90	1.05	1.20	1.35	1.50	1.75
15	0.45	0.55	0.95	1.10	1.20	1.40	1.50	1.90
16	0.45	0.65	1.00	1.10	1.20	1.40	1.50	1.90
17	0.45	0.65	1.00	1.10	1.30	1.40	1.50	1.90
18	0.50	0.75	1.00	1.15	1.35	1.40	1.50	1.90
19	0.50	0.75	1.00	1.15	1.35	1.40	1.50	1.90
20	0.55	0.75	1.00	1.15	1.35	1.40	1.50	1.90
21	0.60	0.75	1.00	1.15	1.35	1.40	1.50	2.00
22	0.65	0.75	1.00	1.15	1.35	1.40	1.50	2.00
23	0.70	0.75	1.00	1.15	1.35	1.40	1.50	2.00
24	0.75	0.75	1.00	1.15	1.35	1.40	1.50	2.00
25	0.75	0.85	1.00	1.15	1.35	1.40	1.50	2.00
26	0.80	0.85	1.00	1.15	1.35	1.40	1.50	2.00
27	0.90	0.85	1.00	1.15	1.35	1.40	1.50	2.00
28	0.90	0.90	1.00	1.15	1.35	1.40	1.50	2.00
29	0.95	0.95	1.00	1.15	1.35	1.40	1.50	2.00
30	0.95	0.95	1.00	1.15	1.35	1.40	1.50	2.00
31	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
32	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
33	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
34	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00
35+	1.00	1.00	1.00	1.15	1.35	1.40	1.50	2.00

The following adverse selection factors are used:

Year of Policyholder Notification *	Without Current Requested Increase	With Current Requested Increase
1	0.0%	2.0%
2	0.0%	1.0%
3	0.0%	0.0%

* For currently requested increase

Interest Rate: 5.0%

EXHIBIT II
RiverSource Life Insurance Company
Nationwide Nursing Home Claim Experience
For Policy Anniversaries through 2012
Policy Form: 30225
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	1,863,075	2,193,535	84.9%	1,467,066	1,973,522	74.3%	3,330,141	4,167,057	79.9%
2	4,856,478	3,960,658	122.6%	2,511,818	2,713,214	92.6%	7,368,296	6,673,872	110.4%
3	7,232,029	6,241,058	115.9%	4,966,626	4,508,353	110.2%	12,198,655	10,749,411	113.5%
4	11,955,778	8,652,100	138.2%	5,992,132	5,812,163	103.1%	17,947,910	14,464,263	124.1%
5	13,610,766	11,373,470	119.7%	7,378,120	7,379,805	100.0%	20,988,886	18,753,275	111.9%
6	11,973,449	14,274,994	83.9%	10,445,158	9,312,070	112.2%	22,418,607	23,587,064	95.0%
7	18,564,702	18,060,929	102.8%	11,007,279	10,762,635	102.3%	29,571,981	28,823,563	102.6%
8	18,564,278	19,665,901	94.4%	10,712,973	11,509,612	93.1%	29,277,251	31,175,513	93.9%
9	24,250,429	21,416,469	113.2%	12,495,019	12,237,030	102.1%	36,745,448	33,653,498	109.2%
10	25,548,818	23,318,750	109.6%	13,731,710	13,600,111	101.0%	39,280,528	36,918,861	106.4%
11	25,658,210	26,207,320	97.9%	15,881,133	14,454,135	109.9%	41,539,343	40,661,455	102.2%
12	30,969,905	28,764,316	107.7%	15,905,146	15,640,710	101.7%	46,875,051	44,405,026	105.6%
13	28,976,360	31,893,835	90.9%	15,424,893	16,517,540	93.4%	44,401,253	48,411,375	91.7%
14	37,741,406	34,965,703	107.9%	14,129,029	18,042,869	78.3%	51,870,436	53,008,573	97.9%
15	33,097,574	36,885,934	89.7%	18,664,928	18,428,122	101.3%	51,762,502	55,314,056	93.6%
16	31,814,279	33,059,957	96.2%	17,778,919	16,623,767	106.9%	49,593,198	49,683,723	99.8%
17	21,425,470	22,668,301	94.5%	10,711,841	11,518,752	93.0%	32,137,311	34,187,052	94.0%
18	12,458,247	13,431,216	92.8%	6,813,551	6,517,962	104.5%	19,271,797	19,949,178	96.6%
19	4,802,557	5,480,139	87.6%	3,010,230	2,530,808	118.9%	7,812,787	8,010,946	97.5%
20	0	3,524	0.0%	0	0	0.0%	0	3,524	0.0%
Total	**365,363,811**	**362,518,109**	**100.8%**	**199,027,571**	**200,083,179**	**99.5%**	**564,391,382**	**562,601,288**	**100.3%**

SPLIT BY ISSUE AGE				
Issue Age	Actual	Expected	A/E	Claim Count
<43	0	179,683	0.0%	0
43-47	1,204,571	1,017,788	118.4%	5
48-52	8,953,935	7,392,336	121.1%	77
53-57	26,140,224	26,345,248	99.2%	262
58-62	79,441,062	79,138,125	100.4%	871
63-67	131,886,980	131,807,276	100.1%	1,634
68-72	148,238,759	146,413,747	101.2%	2,046
73-77	113,321,954	114,828,509	98.7%	1,772
78-82	46,500,688	46,507,990	100.0%	911
83+	8,703,210	8,970,585	97.0%	212
Total	**564,391,382**	**562,601,288**	**100.3%**	**7,790**

EXHIBIT III
RiverSource Life Insurance Company
Long-Term Care Mortality Experience
For Policy Anniversaries in 2000 through Policy Anniversaries in 2012
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	2,157	2,175	99%	(18)
10	2,623	2,643	99%	(20)
11	3,087	3,058	101%	29
12	3,143	3,190	99%	(47)
13	3,099	3,107	100%	(8)
14	2,889	2,926	99%	(37)
15	2,644	2,685	98%	(41)
16	2,455	2,504	98%	(49)
17	2,079	2,093	99%	(14)
18	1,751	1,745	100%	6
19	1,430	1,432	100%	(2)
20	1,110	1,144	97%	(34)
21	854	851	100%	3
22	524	494	106%	30
23	90	80	113%	10
Total	**36,342**	**36,459**	**100%**	**(117)**

SUMMARY BY ISSUE AGE				
Issue Age	Actual Deaths	Expected Deaths	A/E	Difference
<43	22	21	105%	1
43-47	115	126	91%	(11)
48-52	853	852	100%	1
53-57	2,534	2,513	101%	21
58-62	5,821	5,831	100%	(10)
63-67	8,947	9,047	99%	(100)
68-72	9,019	9,023	100%	(4)
73-77	6,112	6,124	100%	(12)
78-82	2,545	2,552	100%	(7)
83+	374	372	101%	2
Total	**36,342**	**36,459**	**100%**	**(117)**

SUMMARY BY ALL DURATION / ISSUE AGE CELLS			
Actual Deaths	Expected Deaths	A/E	Difference
36,342	**36,459**	**100%**	**(117)**

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	2012	
< 10%	6.8%			0.9%	1.5%	1.7%	0.9%	1.2%	1.1%	1.2%
10% - 19.9%	13.6%	0.7%	2.1%	1.4%	1.7%	1.8%	1.4%	1.3%	1.2%	1.5%
20% - 29.9%	24.5%	1.8%	1.7%	1.2%	1.6%	2.5%		4.4%	2.6%	1.8%
30%+	25.5%	2.9%	2.7%	2.4%	2.8%	2.3%	1.4%	1.6%		2.6%
Total	16.4%	2.6%	2.5%	1.3%	1.8%	1.9%	1.4%	1.3%	1.2%	1.8%

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	2012	
< 10%	6.8%			0.3%	0.2%	0.2%	0.4%	0.3%	0.3%	0.2%
10% - 19.9%	13.6%	0.9%	0.8%	0.6%	0.6%	0.7%	0.5%	0.7%	0.6%	0.6%
20% - 29.9%	24.5%	1.8%	1.8%	1.9%	1.5%	2.7%		1.9%	1.1%	1.7%
30%+	25.5%	2.3%	2.1%	2.0%	1.9%	1.8%	1.4%	1.1%	1.9%	2.0%
Total	16.4%	1.4%	1.3%	0.8%	0.7%	0.8%	0.7%	0.9%	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 2012
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			
Duration	Lapses	Actual Exposure	Rate	Expected Lapses	Lapses	Actual Exposure	Rate	Expected Lapses	Lapses	Actual Exposure	Rate	Expected Lapses	Lapses	Actual Exposure	Rate	Expected 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	498	47,453	1.0%	1.1%	187	17,441	1.1%	1.1%	31	2,893	1.1%	1.3%	716	67,788	1.1%	1.1%
10	371	42,329	0.9%	0.8%	212	17,547	1.2%	1.2%	32	2,935	1.1%	1.3%	615	62,811	1.0%	1.0%
11	331	39,397	0.8%	0.8%	194	18,968	1.0%	1.0%	34	3,279	1.0%	1.4%	559	61,644	0.9%	0.9%
12	217	32,431	0.7%	0.7%	149	17,451	0.9%	0.9%	43	2,942	1.5%	1.5%	409	52,823	0.8%	0.8%
13	182	26,176	0.7%	0.7%	134	15,027	0.9%	0.9%	31	2,387	1.3%	1.5%	347	43,591	0.8%	0.8%
14	148	22,259	0.7%	0.7%	101	12,195	0.8%	0.9%	30	1,780	1.7%	1.6%	279	36,234	0.8%	0.8%
15	106	16,998	0.6%	0.7%	84	9,045	0.9%	0.9%	19	1,209	1.6%	1.6%	209	27,251	0.8%	0.8%
16	81	12,238	0.7%	0.7%	73	6,755	1.1%	1.0%	22	821	2.7%	1.7%	176	19,814	0.9%	0.8%
17	61	9,165	0.7%	0.7%	65	5,796	1.1%	1.1%	15	644	2.3%	1.7%	141	15,604	0.9%	0.9%
18	35	6,338	0.6%	0.7%	57	4,358	1.3%	1.3%	13	437	3.0%	1.8%	105	11,132	0.9%	0.9%
19	25	3,787	0.7%	0.7%	36	2,662	1.4%	1.3%	4	228	1.8%	1.8%	65	6,677	1.0%	0.9%
20	17	2,704	0.6%	0.8%	28	1,993	1.4%	1.3%	3	146	2.1%	1.9%	48	4,843	1.0%	1.0%
21	20	2,375	0.8%	0.8%	22	1,995	1.1%	1.3%	3	131	2.3%	1.9%	45	4,501	1.0%	1.0%
22	21	2,021	1.0%	0.8%	19	1,702	1.1%	1.3%	3	116	2.6%	2.0%	43	3,839	1.1%	1.0%
23	3	308	1.0%	0.8%	3	256	1.2%	1.3%	0	18	0.0%	2.0%	6	582	1.0%	0.0%
All Durations	**11,665**	**587,303**	**2.0%**	**2.0%**	**3,341**	**223,866**	**1.5%**	**1.5%**	**565**	**34,224**	**1.7%**	**1.6%**	**15,571**	**845,393**	**1.8%**	**1.8%**
Durations 8 and later	**2,666**	**316,892**	**0.8%**	**0.8%**	**1,559**	**150,543**	**1.0%**	**1.0%**	**321**	**22,837**	**1.4%**	**1.5%**	**4,546**	**490,271**	**0.9%**	**0.9%**

NON-LIFETIME BENEFIT PERIOD																
	Issue Ages 35-62				Issue Ages 63-72				Issue Ages 73+				All Issue Ages			
Duration	Lapses	Actual Exposure	Rate	Expected Lapses	Lapses	Actual Exposure	Rate	Expected Lapses	Lapses	Actual Exposure	Rate	Expected Lapses	Lapses	Actual Exposure	Rate	Expected 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	386	36,096	1.1%	1.2%	292	21,699	1.3%	1.3%	156	6,334	2.5%	2.7%	834	64,129	1.3%	1.4%
10	278	30,401	0.9%	1.0%	225	20,064	1.1%	1.3%	187	5,878	3.2%	3.4%	690	56,343	1.2%	1.3%
11	224	24,545	0.9%	1.0%	287	19,180	1.5%	1.5%	203	5,650	3.6%	3.9%	714	49,376	1.4%	1.5%
12	192	19,493	1.0%	0.9%	240	16,915	1.4%	1.5%	187	4,761	3.9%	4.0%	619	41,169	1.5%	1.5%
13	130	15,218	0.9%	0.8%	206	14,042	1.5%	1.5%	152	3,694	4.1%	4.4%	488	32,954	1.5%	1.5%
14	89	11,010	0.8%	0.8%	156	10,943	1.4%	1.5%	142	2,649	5.4%	4.8%	387	24,602	1.6%	1.5%
15	53	7,472	0.7%	0.7%	141	7,932	1.8%	1.6%	81	1,717	4.7%	4.9%	275	17,122	1.6%	1.6%
16	42	5,885	0.7%	0.7%	114	6,035	1.9%	1.8%	74	1,217	6.1%	5.4%	230	13,136	1.8%	1.7%
17	37	4,228	0.9%	0.8%	100	4,793	2.1%	2.0%	47	895	5.3%	5.4%	184	9,916	1.9%	1.8%
18	29	2,871	1.0%	0.8%	64	3,472	1.8%	2.2%	32	566	5.7%	5.4%	125	6,908	1.8%	1.9%
19	18	1,937	0.9%	0.9%	54	2,241	2.4%	2.4%	15	303	5.0%	5.4%	87	4,481	1.9%	2.0%
20	16	1,341	1.2%	0.9%	49	1,597	3.1%	2.6%	7	186	3.8%	5.4%	72	3,124	2.3%	2.0%
21	12	978	1.2%	0.9%	48	1,352	3.6%	2.8%	10	154	6.5%	5.4%	70	2,483	2.8%	2.2%
22	4	639	0.6%	0.9%	26	920	2.8%	3.0%	11	85	13.0%	5.4%	41	1,643	2.5%	2.3%
23	2	134	1.5%	1.0%	8	155	5.1%	3.2%	0	7	0.0%	5.4%	10	296	3.4%	0.0%
All Durations	**11,028**	**459,558**	**2.4%**	**2.4%**	**5,816**	**273,242**	**2.1%**	**2.1%**	**2,389**	**73,562**	**3.2%**	**3.3%**	**19,233**	**806,361**	**2.4%**	**2.4%**
Durations 8 and later	**1,943**	**199,135**	**1.0%**	**1.0%**	**2,326**	**153,346**	**1.5%**	**1.5%**	**1,454**	**40,688**	**3.6%**	**3.7%**	**5,723**	**393,169**	**1.5%**	**1.5%**

EXHIBIT VI
RiverSource Life Insurance Company
Prior 2004 Rate Increase Assumptions

Policy Form: 30225-VA

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 Form: 30225-VA

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 Form: 30225-VA

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	0.70	1.00	1.00	1.60	2.00	2.50
2	0.70	1.00	1.00	1.60	2.00	2.50
3	0.70	1.00	1.00	1.60	2.00	2.50
4	0.70	1.00	1.10	1.60	2.00	2.50
5	0.70	1.00	1.10	1.60	2.00	2.25
6	0.70	1.00	1.10	1.60	1.90	2.00
7	0.80	1.00	1.10	1.65	1.90	1.85
8	0.80	1.00	1.10	1.65	1.80	1.85
9	0.80	1.10	1.20	1.65	1.80	1.85
10	0.90	1.10	1.20	1.65	1.80	1.85
11	0.90	1.10	1.30	1.65	1.80	1.85
12	0.90	1.20	1.30	1.65	1.80	1.85
13	1.00	1.20	1.30	1.65	1.80	1.85
14	1.00	1.20	1.30	1.65	1.80	1.85
15	1.00	1.25	1.40	1.65	1.80	1.85
16	1.00	1.25	1.40	1.65	1.80	1.85
17	1.10	1.30	1.40	1.65	1.80	1.85
18	1.10	1.30	1.40	1.65	1.80	1.85
19	1.10	1.35	1.40	1.65	1.80	1.85
20	1.15	1.35	1.40	1.65	1.80	1.85
21	1.15	1.35	1.40	1.65	1.80	1.85
22	1.15	1.35	1.40	1.65	1.80	1.85
23	1.20	1.35	1.40	1.65	1.80	1.85
24	1.20	1.35	1.40	1.65	1.80	1.85
25+	1.20	1.35	1.40	1.65	1.80	1.85

EXHIBIT VI
RiverSource Life Insurance Company
Prior 2004 Rate Increase Assumptions

Policy Form: 30225-VA

Prior 2004 Rate Increase Filing Assumptions (cont):

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	0.50	0.50	0.70	0.80	1.60	1.80	1.85
2	0.50	0.60	0.70	0.80	1.60	1.80	1.85
3	0.50	0.70	0.70	0.80	1.60	1.80	1.85
4	0.60	0.70	0.70	0.90	1.50	1.80	1.90
5	0.60	0.70	0.70	0.90	1.50	1.70	1.90
6	0.60	0.70	0.70	0.90	1.50	1.70	1.90
7	0.70	0.70	0.70	1.00	1.40	1.65	1.95
8	0.70	0.70	0.80	1.00	1.40	1.65	1.95
9	0.70	0.70	0.80	1.00	1.40	1.65	1.95
10	0.70	0.80	0.80	1.10	1.40	1.65	1.95
11	0.70	0.80	0.80	1.10	1.40	1.65	1.95
12	0.80	0.80	0.80	1.10	1.40	1.65	1.95
13	0.80	0.80	0.80	1.10	1.45	1.65	1.95
14	0.80	0.80	0.90	1.20	1.45	1.65	1.95
15	0.80	0.80	0.90	1.20	1.45	1.65	1.95
16	0.80	0.80	0.90	1.20	1.45	1.65	1.95
17	0.80	0.90	1.00	1.30	1.45	1.65	1.95
18	0.80	0.90	1.00	1.30	1.45	1.65	1.95
19	0.80	0.90	1.00	1.30	1.45	1.65	1.95
20	0.80	0.90	1.10	1.30	1.45	1.65	1.95
21	0.80	0.90	1.10	1.30	1.45	1.65	1.95
22	0.90	0.90	1.10	1.30	1.45	1.65	1.95
23	0.90	1.00	1.10	1.30	1.45	1.65	1.95
24	0.90	1.00	1.10	1.30	1.45	1.65	1.95
25	0.90	1.00	1.10	1.30	1.45	1.65	1.95
26	0.90	1.00	1.10	1.30	1.45	1.65	1.95
27+	1.00	1.00	1.10	1.30	1.45	1.65	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: 5.0%

EXHIBIT VII
RiverSource Life Insurance Company
Prior 2007 Rate Increase Assumptions

Policy Form: 30225-VA

Prior 2007 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 2007 Rate Increase Assumptions

Policy Form: 30225-VA

Prior 2007 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 2007 Rate Increase Assumptions

Policy Form: 30225-VA

Prior 2007 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	0.70	0.70	0.90	1.00	1.50	2.00	2.50
2	0.70	0.70	0.90	1.00	1.50	2.00	2.50
3	0.70	0.70	0.90	1.00	1.50	2.00	2.50
4	0.70	0.70	0.90	1.10	1.50	2.00	2.50
5	0.70	0.70	0.90	1.10	1.60	2.00	2.25
6	0.70	0.70	0.90	1.10	1.60	1.90	2.00
7	0.80	0.80	0.90	1.10	1.60	1.90	1.80
8	0.80	0.80	0.90	1.10	1.60	1.80	1.80
9	0.80	0.80	1.00	1.20	1.60	1.80	1.80
10	0.80	0.80	1.00	1.30	1.60	1.80	1.80
11	0.80	0.80	1.00	1.45	1.60	1.80	1.80
12	0.80	0.80	1.10	1.45	1.60	1.80	1.80
13	0.80	0.90	1.20	1.45	1.60	1.80	1.80
14	0.80	1.00	1.20	1.45	1.60	1.80	1.80
15	0.80	1.00	1.25	1.45	1.60	1.80	1.80
16	0.80	1.00	1.25	1.45	1.60	1.80	1.80
17	0.80	1.10	1.30	1.45	1.60	1.80	1.80
18	0.90	1.10	1.30	1.45	1.60	1.80	1.80
19	1.00	1.10	1.35	1.45	1.60	1.80	1.80
20	1.00	1.15	1.35	1.45	1.60	1.80	1.80
21	1.00	1.15	1.35	1.45	1.60	1.80	1.80
22	1.10	1.15	1.35	1.45	1.60	1.80	1.80
23	1.10	1.20	1.35	1.45	1.60	1.80	1.80
24	1.10	1.20	1.35	1.45	1.60	1.80	1.80
25	1.15	1.20	1.35	1.45	1.60	1.80	1.80
26	1.15	1.20	1.35	1.45	1.60	1.80	1.80
27	1.15	1.20	1.35	1.45	1.60	1.80	1.80
28+	1.20	1.20	1.35	1.45	1.60	1.80	1.80

EXHIBIT VII
RiverSource Life Insurance Company
Prior 2007 Rate Increase Assumptions

Policy Form: 30225-VA

Prior 2007 Rate Increase Filing Assumptions (cont):

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	0.50	0.50	0.50	0.70	0.75	1.60	1.80	1.85
2	0.50	0.50	0.60	0.70	0.75	1.60	1.80	1.85
3	0.50	0.50	0.70	0.70	0.75	1.60	1.80	1.85
4	0.50	0.50	0.70	0.70	0.90	1.50	1.80	1.90
5	0.60	0.60	0.70	0.70	0.90	1.50	1.70	1.90
6	0.60	0.60	0.70	0.70	0.90	1.50	1.70	1.90
7	0.60	0.60	0.70	0.70	1.10	1.35	1.50	1.95
8	0.70	0.70	0.70	0.75	1.10	1.35	1.50	1.95
9	0.70	0.70	0.70	0.80	1.10	1.35	1.50	1.95
10	0.70	0.70	0.80	0.90	1.20	1.35	1.50	1.95
11	0.70	0.70	0.80	0.90	1.20	1.35	1.50	1.95
12	0.70	0.70	0.80	0.90	1.20	1.35	1.50	1.95
13	0.70	0.70	0.80	0.90	1.20	1.35	1.50	1.95
14	0.70	0.70	0.80	0.90	1.20	1.35	1.50	1.95
15	0.70	0.80	0.80	0.90	1.20	1.35	1.50	1.95
16	0.70	0.80	0.80	0.90	1.20	1.35	1.50	1.95
17	0.70	0.80	0.90	1.00	1.30	1.35	1.50	1.95
18	0.70	0.80	0.90	1.00	1.30	1.35	1.50	1.95
19	0.70	0.80	0.90	1.00	1.30	1.35	1.50	1.95
20	0.80	0.80	0.90	1.10	1.30	1.35	1.50	1.95
21	0.80	0.80	0.90	1.10	1.30	1.35	1.50	1.95
22	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
23	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
24	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
25	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
26	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
27	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
28	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
29	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
30	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
31+	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.95

An additional 2.5% of inforce policyholders is 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 is also assumed.

Interest Rate: 5.0%

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2009 Rate Increase Assumptions

Policy Forms: 30225-VA

Prior 2009 Rate Increase Filing Assumptions:

Mortality: 1983 Individual Annuitant Mortality Basic Table with selection.

Mortality Selection Factors

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

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2009 Rate Increase Assumptions

Policy Forms: 30225-VA

Prior 2009 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	1.5%	1.7%	1.3%
7	1.3%	1.1%	1.3%
8	0.9%	1.1%	1.3%
9	0.9%	1.1%	1.3%
10	0.8%	1.0%	1.3%
11	0.7%	0.9%	1.4%
12	0.7%	0.9%	1.4%
13	0.7%	0.9%	1.5%
14	0.7%	0.9%	1.5%
15	0.7%	0.9%	1.5%
16	0.8%	0.9%	1.5%
17	0.8%	1.0%	1.5%
18	0.8%	1.1%	1.5%
19	0.8%	1.1%	1.5%
20	0.8%	1.1%	1.5%
21	0.9%	1.3%	1.5%
22	0.9%	1.3%	1.5%
23	0.9%	1.3%	1.5%
24	0.9%	1.3%	1.5%
25	0.9%	1.3%	1.5%
26	0.9%	1.3%	1.5%
27	1.0%	1.3%	1.5%
28	1.0%	1.3%	1.5%
29	1.0%	1.3%	1.5%
30	1.0%	1.3%	1.5%
31	1.1%	1.3%	1.5%
32	1.1%	1.3%	1.5%
33	1.1%	1.3%	1.5%
34	1.1%	1.3%	1.5%
35	1.1%	1.3%	1.5%
36+	1.1%	1.3%	1.5%

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%	2.6%
8	1.2%	1.3%	2.8%
9	1.2%	1.3%	3.0%
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%	4.3%
14	0.8%	1.5%	4.4%
15	0.8%	1.6%	4.6%
16	0.8%	1.8%	4.8%
17	0.8%	2.0%	5.0%
18	0.8%	2.6%	5.0%
19	0.9%	2.8%	5.0%
20	0.9%	3.0%	5.0%
21	0.9%	3.5%	5.0%
22	0.9%	3.7%	5.0%
23	1.0%	3.8%	5.0%
24	1.2%	3.9%	5.0%
25	1.4%	4.0%	5.0%
26	1.5%	4.0%	5.0%
27	1.6%	4.0%	5.0%
28	2.1%	4.0%	5.0%
29	2.4%	4.0%	5.0%
30	2.6%	4.0%	5.0%
31	2.9%	4.0%	5.0%
32	3.1%	4.0%	5.0%
33	3.2%	4.0%	5.0%
34	3.3%	4.0%	5.0%
35	3.4%	4.0%	5.0%
36+	3.5%	4.0%	5.0%

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

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2009 Rate Increase Assumptions

Policy Forms: 30225-VA

Prior 2009 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 2007.

Lifetime Benefit Actual-to-Expected Adjustment Factors

	Issue Age Band						
Duration	<53	53-57	58-62	63-67	68-72	73-77	78+
1	0.40	0.40	1.00	1.00	1.50	2.00	2.50
2	0.40	0.40	1.00	1.00	1.50	2.10	2.50
3	0.40	0.40	1.00	1.00	1.50	2.10	2.50
4	0.40	0.40	1.00	1.25	1.70	2.10	2.50
5	0.40	0.40	1.00	1.25	1.70	2.10	2.25
6	0.40	0.40	0.90	1.25	1.70	1.90	2.25
7	0.40	0.50	0.90	1.25	1.70	1.90	1.80
8	0.40	0.50	0.90	1.25	1.70	1.80	1.80
9	0.40	0.50	0.90	1.25	1.55	1.80	1.80
10	0.40	0.60	0.90	1.35	1.55	1.80	1.80
11	0.40	0.60	0.90	1.45	1.55	1.80	1.80
12	0.50	0.60	1.00	1.45	1.55	1.75	1.80
13	0.50	0.70	1.10	1.45	1.55	1.75	1.80
14	0.50	0.80	1.10	1.45	1.55	1.75	1.80
15	0.60	0.90	1.25	1.45	1.55	1.75	1.80
16	0.60	0.90	1.25	1.45	1.55	1.75	1.80
17	0.60	1.00	1.30	1.45	1.55	1.75	1.80
18	0.60	1.10	1.30	1.45	1.55	1.75	1.80
19	0.70	1.10	1.35	1.45	1.55	1.75	1.80
20	0.80	1.15	1.35	1.45	1.55	1.75	1.80
21	0.80	1.15	1.35	1.45	1.55	1.75	1.80
22	0.80	1.15	1.35	1.45	1.55	1.75	1.80
23	1.00	1.20	1.35	1.45	1.55	1.75	1.80
24	1.10	1.20	1.35	1.45	1.55	1.75	1.80
25	1.10	1.20	1.35	1.45	1.55	1.75	1.80
26	1.15	1.20	1.35	1.45	1.55	1.75	1.80
27	1.15	1.20	1.35	1.45	1.55	1.75	1.80
28	1.15	1.20	1.35	1.45	1.55	1.75	1.80
29+	1.20	1.20	1.35	1.45	1.55	1.75	1.80

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2009 Rate Increase Assumptions

Policy Forms: 30225-VA

Prior 2009 Rate Increase Filing Assumptions (cont):

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	0.30	0.30	0.50	0.70	0.70	1.60	1.80	1.85
2	0.30	0.30	0.50	0.70	0.70	1.60	1.80	1.85
3	0.30	0.30	0.70	0.75	0.75	1.50	1.80	1.85
4	0.30	0.30	0.70	0.75	0.75	1.50	1.80	1.90
5	0.40	0.40	0.70	0.75	0.75	1.50	1.80	1.90
6	0.40	0.40	0.70	0.75	0.75	1.50	1.80	1.90
7	0.40	0.40	0.70	0.75	1.10	1.35	1.50	1.95
8	0.40	0.40	0.70	0.75	1.10	1.35	1.50	1.95
9	0.40	0.40	0.70	0.80	1.10	1.35	1.50	1.95
10	0.40	0.40	0.70	1.00	1.20	1.35	1.50	1.95
11	0.40	0.40	0.70	1.00	1.20	1.35	1.50	1.95
12	0.40	0.40	0.70	1.10	1.20	1.35	1.50	1.95
13	0.40	0.50	0.70	1.10	1.20	1.35	1.50	1.95
14	0.40	0.50	0.80	1.10	1.20	1.35	1.50	1.95
15	0.40	0.55	0.80	1.10	1.20	1.35	1.50	1.95
16	0.40	0.60	0.80	1.10	1.20	1.35	1.50	1.95
17	0.40	0.65	0.90	1.10	1.30	1.35	1.50	1.95
18	0.50	0.70	0.90	1.10	1.30	1.35	1.50	1.95
19	0.50	0.80	0.90	1.10	1.30	1.35	1.50	1.95
20	0.55	0.80	0.90	1.10	1.30	1.35	1.50	1.95
21	0.60	0.80	1.00	1.10	1.30	1.35	1.50	1.95
22	0.65	0.90	1.00	1.10	1.30	1.35	1.50	1.95
23	0.70	0.90	1.00	1.10	1.30	1.35	1.50	1.95
24	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
25	0.80	0.90	1.00	1.10	1.30	1.35	1.50	1.95
26	0.80	1.00	1.00	1.10	1.30	1.35	1.50	1.95
27	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
28	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
29	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
30	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.95
31+	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.95

The following adverse selection factors are used, which includes some anti-selection from prior increases:

Calendar Year	Without Current Requested Increase	With Current Requested Increase
2008	4.0%	4.0%
2009	3.0%	4.0%
2010	2.0%	4.0%
2011	1.5%	3.0%
2012	1.0%	2.0%
2013	1.0%	1.0%
2014+	0.0%	0.0%

Interest Rate: 5.0%

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Forms: 30225-VA

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 Forms: 30225-VA

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 Forms: 30225-VA

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	0.40	0.40	0.40	1.00	1.00	1.00	1.00	2.50
2	0.32	0.40	0.40	1.00	1.00	1.00	2.40	2.50
3	0.27	0.40	0.40	1.60	1.60	1.50	2.40	2.40
4	0.23	0.40	0.40	1.60	1.60	2.00	2.15	2.40
5	0.20	0.40	0.50	1.60	1.10	2.00	2.15	2.40
6	0.18	0.40	0.50	1.00	1.10	2.00	2.00	2.40
7	0.20	0.40	0.50	1.00	1.10	2.00	2.00	1.90
8	0.24	0.40	0.50	1.00	1.40	2.00	1.70	1.90
9	0.28	0.40	0.50	1.00	1.40	1.75	1.70	1.90
10	0.32	0.40	0.60	0.85	1.40	1.60	1.70	1.90
11	0.36	0.40	0.60	0.75	1.45	1.60	1.80	1.90
12	0.40	0.50	0.60	0.80	1.50	1.60	1.65	1.90
13	0.40	0.50	0.60	0.95	1.50	1.60	1.65	1.90
14	0.40	0.50	0.65	0.95	1.50	1.60	1.65	1.90
15	0.40	0.60	0.70	1.05	1.50	1.60	1.65	1.90
16	0.40	0.60	0.80	1.10	1.50	1.60	1.65	1.90
17	0.50	0.60	0.80	1.15	1.50	1.60	1.65	1.90
18	0.50	0.60	0.90	1.15	1.50	1.60	1.65	1.90
19	0.50	0.65	0.95	1.20	1.50	1.60	1.65	1.90
20	0.60	0.70	0.95	1.25	1.50	1.60	1.65	1.90
21	0.60	0.80	1.00	1.25	1.50	1.60	1.65	1.90
22	0.60	0.80	1.00	1.30	1.50	1.60	1.65	1.90
23	0.60	0.90	1.05	1.30	1.50	1.60	1.65	1.90
24	0.65	0.95	1.05	1.30	1.50	1.60	1.65	1.90
25	0.70	0.95	1.10	1.30	1.50	1.60	1.65	1.90
26	0.80	1.00	1.10	1.30	1.50	1.60	1.65	1.90
27	0.80	1.00	1.15	1.30	1.50	1.60	1.65	1.90
28	0.90	1.05	1.15	1.30	1.50	1.60	1.65	1.90
29	0.95	1.05	1.15	1.30	1.50	1.60	1.65	1.90
30	0.95	1.10	1.15	1.30	1.50	1.60	1.65	1.90
31	1.00	1.10	1.15	1.30	1.50	1.60	1.65	1.90
32	1.00	1.10	1.15	1.30	1.50	1.60	1.65	1.90
33	1.05	1.10	1.15	1.30	1.50	1.60	1.65	1.90
34	1.05	1.10	1.15	1.30	1.50	1.60	1.65	1.90
35+	1.10	1.10	1.15	1.30	1.50	1.60	1.65	1.90

EXHIBIT VIII
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions

Policy Forms: 30225-VA

Prior 2011 Rate Increase Filing Assumptions (cont):

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	0.30	0.30	0.30	0.40	0.50	0.50	1.60	1.00	2.00
2	0.24	0.30	0.30	0.40	0.50	0.50	1.60	1.00	2.00
3	0.20	0.30	0.30	0.55	0.75	0.80	1.50	1.90	2.00
4	0.17	0.30	0.30	0.55	0.75	0.80	1.50	1.90	2.00
5	0.15	0.35	0.35	0.55	0.75	0.80	1.50	1.90	2.00
6	0.13	0.35	0.35	0.55	0.75	0.80	1.50	1.90	2.00
7	0.15	0.35	0.35	0.55	0.75	1.05	1.35	1.50	2.00
8	0.18	0.35	0.35	0.55	0.75	1.05	1.35	1.50	1.50
9	0.21	0.35	0.35	0.55	0.75	1.05	1.35	1.50	1.50
10	0.28	0.35	0.35	0.70	1.00	1.05	1.35	1.50	1.50
11	0.32	0.40	0.40	0.70	1.00	1.15	1.35	1.50	1.75
12	0.35	0.40	0.40	0.70	1.05	1.20	1.35	1.50	1.75
13	0.35	0.40	0.50	0.70	1.05	1.20	1.35	1.50	1.75
14	0.35	0.40	0.50	0.90	1.05	1.20	1.35	1.50	1.75
15	0.35	0.40	0.55	0.90	1.05	1.30	1.35	1.50	1.75
16	0.40	0.40	0.60	0.90	1.05	1.30	1.35	1.50	1.75
17	0.40	0.40	0.65	0.90	1.05	1.30	1.35	1.50	1.75
18	0.40	0.50	0.70	0.90	1.05	1.30	1.35	1.50	1.75
19	0.40	0.50	0.75	0.90	1.10	1.30	1.35	1.50	1.75
20	0.40	0.55	0.75	0.90	1.10	1.30	1.35	1.50	1.75
21	0.40	0.60	0.75	1.00	1.10	1.30	1.35	1.50	1.75
22	0.40	0.65	0.85	1.00	1.10	1.30	1.35	1.50	1.75
23	0.50	0.70	0.85	1.00	1.10	1.30	1.35	1.50	1.75
24	0.50	0.75	0.85	1.00	1.10	1.30	1.35	1.50	1.75
25	0.55	0.75	0.90	1.00	1.10	1.30	1.35	1.50	1.75
26	0.60	0.80	0.95	1.00	1.10	1.30	1.35	1.50	1.75
27	0.65	0.85	0.95	1.00	1.10	1.30	1.35	1.50	1.75
28	0.70	0.85	1.00	1.00	1.10	1.30	1.35	1.50	1.75
29	0.75	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.75
30	0.75	0.90	1.00	1.00	1.10	1.30	1.35	1.50	1.75
31	0.80	0.95	1.00	1.00	1.10	1.30	1.35	1.50	1.75
32	0.85	0.95	1.00	1.00	1.10	1.30	1.35	1.50	1.75
33	0.85	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
34	0.90	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
35	0.90	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
36	0.95	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
37	0.95	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75
38+	1.00	1.00	1.00	1.00	1.10	1.30	1.35	1.50	1.75

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: 5.0%

EXHIBIT X
RiverSource Life Insurance Company
Nationwide Experience Projections with No Increase
Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis
Policy Form: 30225

			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
	1992	8	145	0	0	0.0%	0.0%	409	0	0	0.0%	0.0%	5.00%	2.8202
	1993	8,609	2,687,161	13,547	147,465	0.5%	5.5%	7,217,338	36,384	396,071	0.5%	5.5%	5.00%	2.6859
	1994	22,300	12,916,809	161,852	1,546,420	1.3%	12.0%	33,040,700	414,010	3,955,682	1.3%	12.0%	5.00%	2.5580
	1995	39,388	26,751,336	524,580	3,369,053	2.0%	12.6%	65,170,369	1,277,959	8,207,531	2.0%	12.6%	5.00%	2.4362
	1996	61,189	42,758,453	1,649,792	6,593,399	3.9%	15.4%	99,205,876	3,827,760	15,297,652	3.9%	15.4%	5.00%	2.3201
	1997	74,032	58,783,795	3,090,519	7,424,220	5.3%	12.6%	129,892,397	6,829,006	16,405,027	5.3%	12.6%	5.00%	2.2097
	1998	77,314	67,697,736	4,844,252	13,305,497	7.2%	19.7%	142,465,910	10,194,443	28,000,638	7.2%	19.7%	5.00%	2.1044
Historical	1999	74,116	66,592,712	7,367,115	18,669,759	11.1%	28.0%	133,467,097	14,765,391	37,418,487	11.1%	28.0%	5.00%	2.0042
Experience	2000	71,332	63,713,697	10,763,930	19,274,006	16.9%	30.3%	121,616,084	20,546,085	36,790,035	16.9%	30.3%	5.00%	1.9088
	2001	69,192	61,140,894	14,405,241	23,482,824	23.6%	38.4%	111,147,755	26,187,223	42,689,320	23.6%	38.4%	5.00%	1.8179
	2002	67,285	58,984,823	18,680,647	31,882,410	31.7%	54.1%	102,122,138	32,342,347	55,198,942	31.7%	54.1%	5.00%	1.7313
	2003	65,504	56,853,917	23,278,895	35,876,618	40.9%	63.1%	93,745,559	38,384,216	59,156,411	40.9%	63.1%	5.00%	1.6489
	2004	63,859	55,057,979	27,534,536	33,373,239	50.0%	60.6%	86,461,205	43,239,312	52,408,215	50.0%	60.6%	5.00%	1.5704
	2005	61,372	50,157,191	31,341,086	29,998,753	62.5%	59.8%	75,014,448	46,873,324	44,865,749	62.5%	59.8%	5.00%	1.4956
	2006	59,452	52,775,548	33,562,912	39,771,059	63.6%	75.4%	75,171,838	47,805,961	56,648,651	63.6%	75.4%	5.00%	1.4244
	2007	57,749	60,977,339	37,427,898	44,353,590	61.4%	72.7%	82,718,298	50,772,501	60,167,491	61.4%	72.7%	5.00%	1.3565
	2008	55,636	59,305,602	42,350,250	46,598,165	71.4%	78.6%	76,619,540	54,714,167	60,202,237	71.4%	78.6%	5.00%	1.2919
	2009	53,387	63,016,024	47,512,751	52,752,330	75.4%	83.7%	77,536,379	58,460,793	64,907,692	75.4%	83.7%	5.00%	1.2304
	2010	51,455	67,630,762	52,103,000	49,544,460	77.0%	73.3%	79,251,867	61,055,944	58,057,766	77.0%	73.3%	5.00%	1.1718
	2011	49,498	65,407,470	55,618,997	66,353,503	85.0%	101.4%	72,996,707	62,072,477	74,052,509	85.0%	101.4%	5.00%	1.1160
	2012	47,526	62,193,076	63,058,486	67,431,878	101.4%	108.4%	66,104,140	67,023,973	71,672,389	101.4%	108.4%	5.00%	1.0629
	1/2013-9/2013	46,237	48,200,249	50,781,323	56,489,129	105.4%	117.2%	49,090,252	51,718,986	57,532,184	105.4%	117.2%	5.00%	1.0185
	10/2013-12/2013	45,551	16,542,560	19,923,980	19,587,615	120.4%	118.4%	16,441,978	19,802,838	19,468,518	120.4%	118.4%	5.00%	0.9939
	2014	43,531	63,736,937	65,741,683	81,620,569	103.1%	128.1%	61,446,792	63,379,505	78,687,844	103.1%	128.1%	5.00%	0.9641
	2015	41,471	59,833,032	72,356,220	86,971,390	120.9%	145.4%	54,936,342	66,434,642	79,853,718	120.9%	145.4%	5.00%	0.9182
	2016	39,372	55,965,249	83,613,661	93,017,872	149.4%	166.2%	48,938,186	73,115,030	81,338,438	149.4%	166.2%	5.00%	0.8744
	2017	37,236	52,143,126	93,516,911	99,381,830	179.3%	190.6%	43,424,737	77,880,778	82,765,076	179.3%	190.6%	5.00%	0.8328
	2018	35,066	48,373,764	100,746,191	105,693,175	208.3%	218.5%	38,367,253	79,906,013	83,829,673	208.3%	218.5%	5.00%	0.7931
Projected	2019	32,874	44,672,323	107,144,249	111,996,443	239.8%	250.7%	33,744,273	80,933,886	84,599,104	239.8%	250.7%	5.00%	0.7554
Future	2020	30,670	41,056,122	113,850,322	118,232,043	277.3%	288.0%	29,535,897	81,904,260	85,056,484	277.3%	288.0%	5.00%	0.7194
Experience	2021	28,468	37,541,204	120,651,331	124,256,135	321.4%	331.0%	25,721,194	82,663,740	85,133,556	321.4%	331.0%	5.00%	0.6851
	2022	26,284	34,149,017	127,313,089	130,031,603	372.8%	380.8%	22,282,906	83,074,300	84,848,183	372.8%	380.8%	5.00%	0.6525
	2023	24,133	30,899,000	133,756,104	135,781,218	432.9%	439.4%	19,202,101	83,122,375	84,380,877	432.9%	439.4%	5.00%	0.6214
	2024	22,026	27,803,405	139,973,930	141,405,560	503.4%	508.6%	16,455,574	82,844,216	83,691,533	503.4%	508.6%	5.00%	0.5919
	2025	19,976	24,870,789	145,938,450	146,500,077	586.8%	589.0%	14,018,944	82,261,280	82,577,853	586.8%	589.0%	5.00%	0.5637
	2026	18,000	22,112,024	151,632,991	150,869,986	685.7%	682.3%	11,870,389	81,401,075	80,991,471	685.7%	682.3%	5.00%	0.5368
	2027	16,113	19,537,901	157,128,894	153,887,047	804.2%	787.6%	9,989,070	80,334,703	78,677,256	804.2%	787.6%	5.00%	0.5113
	2028	14,321	17,152,529	161,856,951	154,557,764	943.6%	901.1%	8,351,914	78,811,427	75,257,306	943.6%	901.1%	5.00%	0.4869
	2029	12,638	14,958,233	165,232,086	153,056,223	1104.6%	1023.2%	6,936,635	76,623,666	70,977,309	1104.6%	1023.2%	5.00%	0.4637
	2030	11,071	12,957,221	167,029,785	150,021,325	1289.1%	1157.8%	5,722,570	73,768,875	66,257,071	1289.1%	1157.8%	5.00%	0.4417
	2031	9,623	11,145,521	167,232,093	145,741,393	1500.4%	1307.6%	4,688,029	70,341,166	61,301,748	1500.4%	1307.6%	5.00%	0.4206
	2032	8,298	9,516,626	165,879,295	140,229,509	1743.0%	1473.5%	3,812,270	66,449,669	56,174,609	1743.0%	1473.5%	5.00%	0.4006
	2033	7,100	8,066,640	163,022,693	133,560,110	2020.9%	1655.7%	3,077,542	62,195,563	50,955,153	2020.9%	1655.7%	5.00%	0.3815
	2034	6,030	6,789,168	158,721,962	125,799,436	2337.9%	1852.9%	2,466,827	57,671,210	45,708,897	2337.9%	1852.9%	5.00%	0.3633
	2035	5,080	5,673,038	153,052,105	117,127,605	2697.9%	2064.6%	1,963,127	52,962,936	40,531,437	2697.9%	2064.6%	5.00%	0.3460
	2036	4,245	4,705,434	146,124,913	107,719,264	3105.5%	2289.3%	1,550,755	48,157,919	35,500,693	3105.5%	2289.3%	5.00%	0.3296
	2037	3,518	3,873,252	138,080,514	97,804,641	3565.0%	2525.1%	1,215,710	43,339,764	30,698,249	3565.0%	2525.1%	5.00%	0.3139
	2038	2,891	3,163,404	129,110,955	87,724,740	4081.4%	2773.1%	945,626	38,594,724	26,223,276	4081.4%	2773.1%	5.00%	0.2989
	2039	2,354	2,563,020	119,450,861	77,745,166	4660.6%	3033.3%	729,672	34,006,727	22,133,441	4660.6%	3033.3%	5.00%	0.2847
	2040	1,900	2,059,622	109,352,862	68,107,017	5309.4%	3306.8%	558,437	29,649,434	18,466,225	5309.4%	3306.8%	5.00%	0.2711
	2041	1,520	1,641,280	99,067,478	59,009,504	6036.0%	3595.3%	423,818	25,581,621	15,237,682	6036.0%	3595.3%	5.00%	0.2582
	2042	1,204	1,296,749	88,834,681	50,619,947	6850.6%	3903.6%	318,907	21,846,919	12,448,853	6850.6%	3903.6%	5.00%	0.2459
	2043	945	1,015,587	78,871,084	43,025,102	7766.1%	4236.5%	237,868	18,472,946	10,077,209	7766.1%	4236.5%	5.00%	0.2342
	2044	735	788,256	69,354,317	36,231,175	8798.5%	4596.4%	175,831	15,470,436	8,081,863	8798.5%	4596.4%	5.00%	0.2231
	2045	565	606,168	60,415,508	30,209,050	9966.8%	4983.6%	128,775	12,834,773	6,417,662	9966.8%	4983.6%	5.00%	0.2124
	2046	430	461,704	52,139,533	24,911,670	11292.8%	5395.6%	93,414	10,549,153	5,040,264	11292.8%	5395.6%	5.00%	0.2023
	2047	324	348,200	44,572,807	20,288,249	12800.9%	5826.6%	67,095	8,588,773	3,909,361	12800.9%	5826.6%	5.00%	0.1927
	2048	241	259,907	37,732,884	16,295,083	14517.8%	6269.6%	47,697	6,924,555	2,990,394	14517.8%	6269.6%	5.00%	0.1835
	2049	178	191,931	31,618,088	12,893,977	16473.7%	6718.0%	33,545	5,526,093	2,253,562	16473.7%	6718.0%	5.00%	0.1748
	2050	129	140,155	26,213,821	10,047,797	18703.4%	7169.1%	23,329	4,363,386	1,672,492	18703.4%	7169.1%	5.00%	0.1665
	2051	93	101,157	21,494,450	7,709,181	21248.6%	7621.0%	16,036	3,407,456	1,222,115	21248.6%	7621.0%	5.00%	0.1585
	2052	66	72,123	17,426,624	5,833,777	24162.5%	8088.7%	10,889	2,631,043	880,774	24162.5%	8088.7%	5.00%	0.1510
	Past		1,103,602,716	526,071,609	648,237,776	47.7%	58.7%	1,780,056,306	698,542,262	904,030,678	39.2%	50.8%		
	Future		688,783,378	4,205,176,353	3,575,501,269	610.5%	519.1%	489,971,952	1,987,828,876	1,846,317,226	405.7%	376.8%		
	Lifetime		1,792,386,094	4,731,247,962	4,223,739,045	264.0%	235.6%	2,270,028,259	2,686,371,138	2,750,347,905	118.3%	121.2%		

EXHIBIT X
RiverSource Life Insurance Company
Nationwide Experience Projections with 15% Increase
Adjusted for Cumulative Prior Approved Rate Increases on a Nationwide Basis
Policy Form: 30225

			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
	1992	8	145	0	0	0.0%	0.0%	409	0	0	0.0%	0.0%	5.00%	2.8202
	1993	8,609	2,687,161	13,547	147,465	0.5%	5.5%	7,217,338	36,384	396,071	0.5%	5.5%	5.00%	2.6859
	1994	22,300	12,916,809	161,852	1,546,420	1.3%	12.0%	33,040,700	414,010	3,955,682	1.3%	12.0%	5.00%	2.5580
	1995	39,388	26,751,336	524,580	3,369,053	2.0%	12.6%	65,170,369	1,277,959	8,207,531	2.0%	12.6%	5.00%	2.4362
	1996	61,189	42,758,453	1,649,792	6,593,399	3.9%	15.4%	99,205,876	3,827,760	15,297,652	3.9%	15.4%	5.00%	2.3201
	1997	74,032	58,783,795	3,090,519	7,424,220	5.3%	12.6%	129,892,397	6,829,006	16,405,027	5.3%	12.6%	5.00%	2.2097
	1998	77,314	67,697,736	4,844,252	13,305,497	7.2%	19.7%	142,465,910	10,194,443	28,000,638	7.2%	19.7%	5.00%	2.1044
Historical	1999	74,116	66,592,712	7,367,115	18,669,759	11.1%	28.0%	133,467,097	14,765,391	37,418,487	11.1%	28.0%	5.00%	2.0042
Experience	2000	71,332	63,713,697	10,763,930	19,274,006	16.9%	30.3%	121,616,084	20,546,085	36,790,035	16.9%	30.3%	5.00%	1.9088
	2001	69,192	61,140,894	14,405,241	23,482,824	23.6%	38.4%	111,147,755	26,187,223	42,689,320	23.6%	38.4%	5.00%	1.8179
	2002	67,285	58,984,823	18,680,647	31,882,410	31.7%	54.1%	102,122,138	32,342,347	55,198,942	31.7%	54.1%	5.00%	1.7313
	2003	65,504	56,853,917	23,278,895	35,876,618	40.9%	63.1%	93,745,559	38,384,216	59,156,411	40.9%	63.1%	5.00%	1.6489
	2004	63,859	55,057,979	27,534,536	33,373,239	50.0%	60.6%	86,461,205	43,239,312	52,408,215	50.0%	60.6%	5.00%	1.5704
	2005	61,372	50,157,191	31,341,086	29,998,753	62.5%	59.8%	75,014,448	46,873,324	44,865,749	62.5%	59.8%	5.00%	1.4956
	2006	59,452	52,775,548	33,562,912	39,771,059	63.6%	75.4%	75,171,838	47,805,961	56,648,651	63.6%	75.4%	5.00%	1.4244
	2007	57,749	60,977,339	37,427,898	44,353,590	61.4%	72.7%	82,718,298	50,772,501	60,167,491	61.4%	72.7%	5.00%	1.3565
	2008	55,636	59,305,602	42,350,250	46,598,165	71.4%	78.6%	76,619,540	54,714,167	60,202,237	71.4%	78.6%	5.00%	1.2919
	2009	53,387	63,016,024	47,512,751	52,752,330	75.4%	83.7%	77,536,379	58,460,793	64,907,692	75.4%	83.7%	5.00%	1.2304
	2010	51,455	67,630,762	52,103,000	49,544,460	77.0%	73.3%	79,251,867	61,055,944	58,057,766	77.0%	73.3%	5.00%	1.1718
	2011	49,498	65,407,470	55,618,997	66,353,503	85.0%	101.4%	72,996,707	62,072,477	74,052,509	85.0%	101.4%	5.00%	1.1160
	2012	47,526	62,193,076	63,058,486	67,431,878	101.4%	108.4%	66,104,140	67,023,973	71,672,389	101.4%	108.4%	5.00%	1.0629
	1/2013-9/2013	46,237	48,200,249	50,781,323	56,489,129	105.4%	117.2%	49,090,252	51,718,986	57,532,184	105.4%	117.2%	5.00%	1.0185
	10/2013-12/2013	45,551	16,542,560	19,923,980	19,587,615	120.4%	118.4%	16,441,978	19,802,838	19,468,518	120.4%	118.4%	5.00%	0.9939
	2014	43,171	64,915,114	65,737,003	81,563,789	101.3%	125.6%	62,582,636	63,374,993	78,633,104	101.3%	125.6%	5.00%	0.9641
	2015	40,929	66,712,682	72,363,554	87,202,826	108.5%	130.7%	61,252,966	66,441,375	80,066,213	108.5%	130.7%	5.00%	0.9182
	2016	38,858	63,074,856	83,630,296	92,532,076	132.6%	146.7%	55,155,102	73,129,577	80,913,639	132.6%	146.7%	5.00%	0.8744
	2017	36,749	58,767,348	93,258,649	97,953,656	158.7%	166.7%	48,941,381	77,665,698	81,575,694	158.7%	166.7%	5.00%	0.8328
	2018	34,608	54,519,281	100,053,520	104,004,108	183.5%	190.8%	43,241,520	79,356,627	82,490,004	183.5%	190.8%	5.00%	0.7931
Projected	2019	32,445	50,347,739	106,060,178	110,168,993	210.7%	218.8%	38,031,329	80,115,008	83,218,696	210.7%	218.8%	5.00%	0.7554
Future	2020	30,270	46,272,239	112,436,936	116,265,813	243.0%	251.3%	33,288,387	80,887,467	83,641,972	243.0%	251.3%	5.00%	0.7194
Experience	2021	28,096	42,310,863	118,977,156	122,153,707	281.2%	288.7%	28,989,106	81,516,686	83,693,086	281.2%	288.7%	5.00%	0.6851
	2022	25,941	38,487,785	125,419,995	127,796,549	325.9%	332.0%	25,114,038	81,839,019	83,389,767	325.9%	332.0%	5.00%	0.6525
	2023	23,818	34,824,918	131,662,005	133,413,520	378.1%	383.1%	21,641,852	81,821,003	82,909,477	378.1%	383.1%	5.00%	0.6214
	2024	21,738	31,336,072	137,691,456	138,907,414	439.4%	443.3%	18,546,399	81,493,323	82,212,994	439.4%	443.3%	5.00%	0.5919
	2025	19,715	28,030,893	143,479,919	143,881,483	511.9%	513.3%	15,800,203	80,875,477	81,101,828	511.9%	513.3%	5.00%	0.5637
	2026	17,765	24,921,639	149,012,248	148,144,978	597.9%	594.4%	13,378,673	79,994,183	79,528,606	597.9%	594.4%	5.00%	0.5368
	2027	15,902	22,020,472	154,362,556	151,081,846	701.0%	686.1%	11,258,325	78,920,367	77,243,051	701.0%	686.1%	5.00%	0.5113
	2028	14,134	19,332,029	158,968,211	151,717,655	822.3%	784.8%	9,413,157	77,404,841	73,874,399	822.3%	784.8%	5.00%	0.4869
	2029	12,473	16,858,933	162,251,907	150,223,605	962.4%	891.1%	7,818,053	75,241,657	69,663,729	962.4%	891.1%	5.00%	0.4637
	2030	10,926	14,603,672	163,990,968	147,226,998	1122.9%	1008.2%	6,449,727	72,426,779	65,022,954	1122.9%	1008.2%	5.00%	0.4417
	2031	9,497	12,561,773	164,166,221	143,010,998	1306.9%	1138.5%	5,283,733	69,051,599	60,153,289	1306.9%	1138.5%	5.00%	0.4206
	2032	8,189	10,725,902	162,817,247	137,588,586	1518.0%	1282.8%	4,296,695	65,223,042	55,116,680	1518.0%	1282.8%	5.00%	0.4006
	2033	7,008	9,091,671	159,994,683	131,032,928	1759.8%	1441.2%	3,468,607	61,040,333	49,990,996	1759.8%	1441.2%	5.00%	0.3815
	2034	5,951	7,651,872	155,757,305	123,409,043	2035.5%	1612.8%	2,780,288	56,594,010	44,840,354	2035.5%	1612.8%	5.00%	0.3633
	2035	5,014	6,393,916	150,178,887	114,893,563	2348.8%	1796.9%	2,212,583	51,968,673	39,758,358	2348.8%	1796.9%	5.00%	0.3460
	2036	4,190	5,303,358	143,369,214	105,657,695	2703.4%	1992.3%	1,747,811	47,249,732	34,821,268	2703.4%	1992.3%	5.00%	0.3296
	2037	3,472	4,365,429	135,465,805	95,927,107	3103.1%	2197.4%	1,370,191	42,519,077	30,108,942	3103.1%	2197.4%	5.00%	0.3139
	2038	2,853	3,565,380	126,657,012	86,036,066	3552.4%	2413.1%	1,065,788	37,861,175	25,718,486	3552.4%	2413.1%	5.00%	0.2989
	2039	2,323	2,888,705	117,172,887	76,244,850	4056.2%	2639.4%	822,392	33,358,205	21,706,313	4056.2%	2639.4%	5.00%	0.2847
	2040	1,875	2,321,339	107,261,091	66,789,697	4620.7%	2877.2%	629,397	29,082,281	18,109,052	4620.7%	2877.2%	5.00%	0.2711
	2041	1,500	1,849,838	97,167,183	57,865,762	5252.7%	3128.2%	477,673	25,090,919	14,942,341	5252.7%	3128.2%	5.00%	0.2582
	2042	1,189	1,461,527	87,126,339	49,636,929	5961.3%	3396.2%	359,430	21,426,790	12,207,101	5961.3%	3396.2%	5.00%	0.2459
	2043	933	1,144,638	77,350,809	42,188,093	6757.7%	3685.7%	268,094	18,116,872	9,881,167	6757.7%	3685.7%	5.00%	0.2342
	2044	725	888,419	68,014,611	35,525,184	7655.7%	3998.7%	198,174	15,171,596	7,924,382	7655.7%	3998.7%	5.00%	0.2231
	2045	558	683,193	59,246,157	29,619,523	8671.9%	4335.5%	145,139	12,586,354	6,292,422	8671.9%	4335.5%	5.00%	0.2124
	2046	425	520,372	51,128,514	24,424,851	9825.4%	4693.7%	105,285	10,344,598	4,941,768	9825.4%	4693.7%	5.00%	0.2023
	2047	320	392,445	43,707,047	19,891,280	11137.1%	5068.5%	75,621	8,421,949	3,832,868	11137.1%	5068.5%	5.00%	0.1927
	2048	238	292,933	36,998,832	15,975,877	12630.5%	5453.8%	53,758	6,789,845	2,931,815	12630.5%	5453.8%	5.00%	0.1835
	2049	175	216,319	31,002,105	12,641,127	14331.6%	5843.7%	37,807	5,418,433	2,209,369	14331.6%	5843.7%	5.00%	0.1748
	2050	128	157,964	25,702,445	9,850,568	16271.0%	6235.9%	26,294	4,278,265	1,639,663	16271.0%	6235.9%	5.00%	0.1665
	2051	92	114,011	21,074,625	7,557,720	18484.7%	6628.9%	18,074	3,340,903	1,198,105	18484.7%	6628.9%	5.00%	0.1585
	2052	65	81,287	17,085,866	5,719,065	21019.1%	7035.6%	12,273	2,579,596	863,455	21019.1%	7035.6%	5.00%	0.1510
	Past		1,103,602,716	526,071,609	648,237,776	47.7%	58.7%	1,780,056,306	698,542,262	904,030,678	39.2%	50.8%		
	Future		766,551,388	4,137,725,423	3,515,313,141	539.8%	458.6%	542,799,935	1,959,821,167	1,817,835,923	361.1%	334.9%		
	Lifetime		1,870,154,104	4,663,797,031	4,163,550,917	249.4%	222.6%	2,322,856,241	2,658,363,429	2,721,866,602	114.4%	117.2%		

EXHIBIT XI
RiverSource Life Insurance Company
Virginia Experience Projections with No Increase
Policy Form: 30225-VA

			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
	1992	0	0	0	0	0.0%	0.0%	0	0	0	0.0%	0.0%	5.00%	2.8202
	1993	292	98,888	0	0	0.0%	0.0%	265,599	0	0	0.0%	0.0%	5.00%	2.6859
	1994	748	418,230	6,490	387,631	1.6%	92.7%	1,069,817	16,602	991,546	1.6%	92.7%	5.00%	2.5580
	1995	1,435	902,340	21,320	213	2.4%	0.0%	2,198,239	51,940	518	2.4%	0.0%	5.00%	2.4362
	1996	2,393	1,529,333	36,792	155,443	2.4%	10.2%	3,548,276	85,363	360,651	2.4%	10.2%	5.00%	2.3201
	1997	2,963	2,145,118	114,365	826,897	5.3%	38.5%	4,739,989	252,709	1,827,165	5.3%	38.5%	5.00%	2.2097
	1998	3,018	2,525,593	96,075	1,429,632	3.8%	56.6%	5,314,962	202,185	3,008,576	3.8%	56.6%	5.00%	2.1044
Historical	1999	2,846	2,386,879	168,375	679,862	7.1%	28.5%	4,783,855	337,461	1,362,600	7.1%	28.5%	5.00%	2.0042
Experience	2000	2,760	2,297,144	311,758	21,598	13.6%	0.9%	4,384,767	595,081	41,227	13.6%	0.9%	5.00%	1.9088
	2001	2,695	2,227,711	442,777	805,162	19.9%	36.1%	4,049,745	804,922	1,463,700	19.9%	36.1%	5.00%	1.8179
	2002	2,643	2,167,337	547,360	1,571,307	25.3%	72.5%	3,752,373	947,661	2,720,450	25.3%	72.5%	5.00%	1.7313
	2003	2,569	2,102,370	761,208	1,381,359	36.2%	65.7%	3,466,566	1,255,145	2,277,702	36.2%	65.7%	5.00%	1.6489
	2004	2,511	2,035,594	1,021,139	1,529,432	50.2%	75.1%	3,196,629	1,603,563	2,401,768	50.2%	75.1%	5.00%	1.5704
	2005	2,466	1,964,083	995,965	716,605	50.7%	36.5%	2,937,457	1,489,553	1,071,746	50.7%	36.5%	5.00%	1.4956
	2006	2,378	2,068,834	1,250,293	1,314,435	60.4%	63.5%	2,946,782	1,780,878	1,872,240	60.4%	63.5%	5.00%	1.4244
	2007	2,300	2,293,050	1,337,956	965,508	58.3%	42.1%	3,110,617	1,814,993	1,309,752	58.3%	42.1%	5.00%	1.3565
	2008	2,234	2,228,600	1,542,727	1,247,936	69.2%	56.0%	2,879,227	1,993,117	1,612,264	69.2%	56.0%	5.00%	1.2919
	2009	2,165	2,362,148	1,389,060	2,092,374	58.8%	88.6%	2,906,442	1,709,132	2,574,506	58.8%	88.6%	5.00%	1.2304
	2010	2,099	2,564,764	1,650,590	1,007,494	64.4%	39.3%	3,005,471	1,934,213	1,180,614	64.4%	39.3%	5.00%	1.1718
	2011	2,052	2,515,138	1,971,187	1,974,607	78.4%	78.5%	2,806,970	2,199,904	2,203,721	78.4%	78.5%	5.00%	1.1160
	2012	1,998	2,450,850	2,063,176	894,884	84.2%	36.5%	2,604,974	2,192,920	951,160	84.2%	36.5%	5.00%	1.0629
	1/2013-9/2013	1,944	1,915,182	1,612,223	1,094,472	84.2%	57.1%	1,950,545	1,641,992	1,114,681	84.2%	57.1%	5.00%	1.0185
	10/2013-12/2013	1,926	652,989	870,083	698,670	133.2%	107.0%	649,018	864,793	694,422	133.2%	107.0%	5.00%	0.9939
	2014	1,855	2,533,548	2,476,860	2,935,049	97.8%	115.8%	2,442,515	2,387,863	2,829,589	97.8%	115.8%	5.00%	0.9641
	2015	1,781	2,405,575	2,633,089	3,173,963	109.5%	131.9%	2,208,705	2,417,599	2,914,208	109.5%	131.9%	5.00%	0.9182
	2016	1,705	2,275,968	2,988,019	3,446,056	131.3%	151.4%	1,990,195	2,612,840	3,013,365	131.3%	151.4%	5.00%	0.8744
	2017	1,626	2,145,041	3,359,161	3,738,104	156.6%	174.3%	1,786,388	2,797,505	3,113,089	156.6%	174.3%	5.00%	0.8328
	2018	1,544	2,013,146	3,669,925	4,037,957	182.3%	200.6%	1,596,710	2,910,771	3,202,672	182.3%	200.6%	5.00%	0.7931
Projected	2019	1,460	1,880,985	3,979,731	4,355,450	211.6%	231.6%	1,420,845	3,006,182	3,289,990	211.6%	231.6%	5.00%	0.7554
Future	2020	1,374	1,749,270	4,307,022	4,681,644	246.2%	267.6%	1,258,430	3,098,485	3,367,988	246.2%	267.6%	5.00%	0.7194
Experience	2021	1,286	1,618,727	4,643,453	5,018,302	286.9%	310.0%	1,109,064	3,181,442	3,438,268	286.9%	310.0%	5.00%	0.6851
	2022	1,199	1,490,303	4,990,274	5,347,990	334.8%	358.9%	972,452	3,256,252	3,489,669	334.8%	358.9%	5.00%	0.6525
	2023	1,111	1,364,995	5,338,326	5,696,121	391.1%	417.3%	848,272	3,317,488	3,539,839	391.1%	417.3%	5.00%	0.6214
	2024	1,023	1,243,263	5,700,173	6,053,349	458.5%	486.9%	735,831	3,373,674	3,582,703	458.5%	486.9%	5.00%	0.5919
	2025	937	1,125,732	6,060,844	6,391,997	538.4%	567.8%	634,542	3,416,322	3,602,984	538.4%	567.8%	5.00%	0.5637
	2026	852	1,013,080	6,425,728	6,706,223	634.3%	662.0%	543,851	3,449,521	3,600,099	634.3%	662.0%	5.00%	0.5368
	2027	770	905,949	6,785,468	6,953,346	749.0%	767.5%	463,181	3,469,181	3,555,011	749.0%	767.5%	5.00%	0.5113
	2028	691	804,815	7,114,615	7,075,135	884.0%	879.1%	391,881	3,464,250	3,445,026	884.0%	879.1%	5.00%	0.4869
	2029	615	710,043	7,381,662	7,094,035	1039.6%	999.1%	329,271	3,423,125	3,289,742	1039.6%	999.1%	5.00%	0.4637
	2030	544	622,030	7,576,058	7,049,016	1218.0%	1133.2%	274,720	3,345,974	3,113,205	1218.0%	1133.2%	5.00%	0.4417
	2031	477	540,915	7,697,738	6,951,763	1423.1%	1285.2%	227,520	3,237,823	2,924,051	1423.1%	1285.2%	5.00%	0.4206
	2032	415	466,675	7,748,539	6,789,121	1660.4%	1454.8%	186,945	3,103,991	2,719,658	1660.4%	1454.8%	5.00%	0.4006
	2033	358	399,525	7,727,686	6,561,593	1934.2%	1642.3%	152,425	2,948,226	2,503,345	1934.2%	1642.3%	5.00%	0.3815
	2034	306	339,481	7,633,938	6,263,525	2248.7%	1845.0%	123,350	2,773,771	2,275,835	2248.7%	1845.0%	5.00%	0.3633
	2035	260	286,236	7,464,488	5,889,274	2607.8%	2057.5%	99,051	2,583,050	2,037,955	2607.8%	2057.5%	5.00%	0.3460
	2036	218	239,423	7,217,497	5,455,162	3014.5%	2278.5%	78,906	2,378,647	1,797,840	3014.5%	2278.5%	5.00%	0.3296
	2037	182	198,629	6,896,464	4,976,847	3472.0%	2505.6%	62,344	2,164,615	1,562,099	3472.0%	2505.6%	5.00%	0.3139
	2038	151	163,410	6,509,326	4,475,312	3983.4%	2738.7%	48,848	1,945,812	1,337,791	3983.4%	2738.7%	5.00%	0.2989
	2039	123	133,292	6,068,308	3,971,844	4552.6%	2979.8%	37,947	1,727,600	1,130,753	4552.6%	2979.8%	5.00%	0.2847
	2040	100	107,788	5,588,801	3,483,943	5185.0%	3232.2%	29,225	1,515,322	944,620	5185.0%	3232.2%	5.00%	0.2711
	2041	81	86,403	5,087,563	3,026,662	5888.2%	3503.0%	22,311	1,313,732	781,557	5888.2%	3503.0%	5.00%	0.2582
	2042	64	68,648	4,580,685	2,606,664	6672.7%	3797.1%	16,882	1,126,518	641,051	6672.7%	3797.1%	5.00%	0.2459
	2043	51	54,053	4,082,072	2,227,832	7552.0%	4121.6%	12,660	956,091	521,796	7552.0%	4121.6%	5.00%	0.2342
	2044	40	42,173	3,602,922	1,888,690	8543.2%	4478.5%	9,407	803,681	421,298	8543.2%	4478.5%	5.00%	0.2231
	2045	31	32,597	3,151,293	1,587,680	9667.3%	4870.6%	6,925	669,466	337,289	9667.3%	4870.6%	5.00%	0.2124
	2046	23	24,956	2,732,145	1,321,070	10947.9%	5293.6%	5,049	552,782	267,286	10947.9%	5293.6%	5.00%	0.2023
	2047	18	18,918	2,347,734	1,084,548	12409.8%	5732.8%	3,645	452,387	208,983	12409.8%	5732.8%	5.00%	0.1927
	2048	13	14,197	1,998,838	879,333	14079.5%	6193.9%	2,605	366,817	161,371	14079.5%	6193.9%	5.00%	0.1835
	2049	10	10,543	1,685,692	702,751	15989.1%	6665.7%	1,843	294,619	122,824	15989.1%	6665.7%	5.00%	0.1748
	2050	7	7,745	1,407,452	552,863	18171.8%	7138.1%	1,289	234,276	92,026	18171.8%	7138.1%	5.00%	0.1665
	2051	5	5,627	1,162,757	427,784	20662.8%	7601.9%	892	184,329	67,815	20662.8%	7601.9%	5.00%	0.1585
	2052	4	4,042	950,134	326,758	23507.6%	8084.5%	610	143,450	49,333	23507.6%	8084.5%	5.00%	0.1510
	Past		41,199,188	17,340,838	20,096,852	42.1%	48.8%	65,919,306	22,909,335	30,346,585	34.8%	46.0%		
	Future		29,800,734	189,642,565	161,903,424	636.4%	543.3%	20,786,552	85,270,271	79,988,446	410.2%	384.8%		
	Lifetime		70,999,921	206,983,402	182,000,276	291.5%	256.3%	86,705,858	108,179,605	110,335,031	124.8%	127.3%		

EXHIBIT XI
RiverSource Life Insurance Company
Virginia Experience Projections with 15% Increase
Policy Form: 30225-VA

			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
	1992	0	0	0	0	0.0%	0.0%	0	0	0	0.0%	0.0%	5.00%	2.8202
	1993	292	98,888	0	0	0.0%	0.0%	265,599	0	0	0.0%	0.0%	5.00%	2.6859
	1994	748	418,230	6,490	387,631	1.6%	92.7%	1,069,817	16,602	991,546	1.6%	92.7%	5.00%	2.5580
	1995	1,435	902,340	21,320	213	2.4%	0.0%	2,198,239	51,940	518	2.4%	0.0%	5.00%	2.4362
	1996	2,393	1,529,333	36,792	155,443	2.4%	10.2%	3,548,276	85,363	360,651	2.4%	10.2%	5.00%	2.3201
	1997	2,963	2,145,118	114,365	826,897	5.3%	38.5%	4,739,989	252,709	1,827,165	5.3%	38.5%	5.00%	2.2097
	1998	3,018	2,525,593	96,075	1,429,632	3.8%	56.6%	5,314,962	202,185	3,008,576	3.8%	56.6%	5.00%	2.1044
Historical	1999	2,846	2,386,879	168,375	679,862	7.1%	28.5%	4,783,855	337,461	1,362,600	7.1%	28.5%	5.00%	2.0042
Experience	2000	2,760	2,297,144	311,758	21,598	13.6%	0.9%	4,384,767	595,081	41,227	13.6%	0.9%	5.00%	1.9088
	2001	2,695	2,227,711	442,777	805,162	19.9%	36.1%	4,049,745	804,922	1,463,700	19.9%	36.1%	5.00%	1.8179
	2002	2,643	2,167,337	547,360	1,571,307	25.3%	72.5%	3,752,373	947,661	2,720,450	25.3%	72.5%	5.00%	1.7313
	2003	2,569	2,102,370	761,208	1,381,359	36.2%	65.7%	3,466,566	1,255,145	2,277,702	36.2%	65.7%	5.00%	1.6489
	2004	2,511	2,035,594	1,021,139	1,529,432	50.2%	75.1%	3,196,629	1,603,563	2,401,768	50.2%	75.1%	5.00%	1.5704
	2005	2,466	1,964,083	995,965	716,605	50.7%	36.5%	2,937,457	1,489,553	1,071,746	50.7%	36.5%	5.00%	1.4956
	2006	2,378	2,068,834	1,250,293	1,314,435	60.4%	63.5%	2,946,782	1,780,878	1,872,240	60.4%	63.5%	5.00%	1.4244
	2007	2,300	2,293,050	1,337,956	965,508	58.3%	42.1%	3,110,617	1,814,993	1,309,752	58.3%	42.1%	5.00%	1.3565
	2008	2,234	2,228,600	1,542,727	1,247,936	69.2%	56.0%	2,879,227	1,993,117	1,612,264	69.2%	56.0%	5.00%	1.2919
	2009	2,165	2,362,148	1,389,060	2,092,374	58.8%	88.6%	2,906,442	1,709,132	2,574,506	58.8%	88.6%	5.00%	1.2304
	2010	2,099	2,564,764	1,650,590	1,007,494	64.4%	39.3%	3,005,471	1,934,213	1,180,614	64.4%	39.3%	5.00%	1.1718
	2011	2,052	2,515,138	1,971,187	1,974,607	78.4%	78.5%	2,806,970	2,199,904	2,203,721	78.4%	78.5%	5.00%	1.1160
	2012	1,998	2,450,850	2,063,176	894,884	84.2%	36.5%	2,604,974	2,192,920	951,160	84.2%	36.5%	5.00%	1.0629
	1/2013-9/2013	1,944	1,915,182	1,612,223	1,094,472	84.2%	57.1%	1,950,545	1,641,992	1,114,681	84.2%	57.1%	5.00%	1.0185
	10/2013-12/2013	1,926	652,989	870,083	698,670	133.2%	107.0%	649,018	864,793	694,422	133.2%	107.0%	5.00%	0.9939
	2014	1,840	2,578,414	2,476,709	2,932,983	96.1%	113.8%	2,485,768	2,387,718	2,827,597	96.1%	113.8%	5.00%	0.9641
	2015	1,758	2,680,623	2,633,279	3,181,694	98.2%	118.7%	2,461,243	2,417,773	2,921,306	98.2%	118.7%	5.00%	0.9182
	2016	1,683	2,565,149	2,988,334	3,427,267	116.5%	133.6%	2,243,066	2,613,115	2,996,935	116.5%	133.6%	5.00%	0.8744
	2017	1,604	2,417,591	3,349,577	3,683,611	138.6%	152.4%	2,013,367	2,789,524	3,067,707	138.6%	152.4%	5.00%	0.8328
	2018	1,524	2,268,942	3,644,418	3,972,583	160.6%	175.1%	1,799,593	2,890,540	3,150,822	160.6%	175.1%	5.00%	0.7931
Projected	2019	1,441	2,119,992	3,939,508	4,283,539	185.8%	202.1%	1,601,385	2,975,798	3,235,671	185.8%	202.1%	5.00%	0.7554
Future	2020	1,356	1,971,545	4,253,769	4,602,965	215.8%	233.5%	1,418,336	3,060,174	3,311,386	215.8%	233.5%	5.00%	0.7194
Experience	2021	1,270	1,824,417	4,578,939	4,932,603	251.0%	270.4%	1,249,992	3,137,240	3,379,552	251.0%	270.4%	5.00%	0.6851
	2022	1,183	1,679,677	4,915,625	5,255,330	292.7%	312.9%	1,096,023	3,207,542	3,429,206	292.7%	312.9%	5.00%	0.6525
	2023	1,096	1,538,449	5,254,026	5,596,107	341.5%	363.7%	956,065	3,265,101	3,477,686	341.5%	363.7%	5.00%	0.6214
	2024	1,010	1,401,250	5,606,453	5,945,774	400.1%	424.3%	829,336	3,318,205	3,519,034	400.1%	424.3%	5.00%	0.5919
	2025	925	1,268,785	5,957,938	6,277,183	469.6%	494.7%	715,177	3,358,317	3,538,266	469.6%	494.7%	5.00%	0.5637
	2026	841	1,141,819	6,313,961	6,584,614	553.0%	576.7%	612,962	3,389,521	3,534,815	553.0%	576.7%	5.00%	0.5368
	2027	760	1,021,075	6,665,334	6,826,197	652.8%	668.5%	522,041	3,407,760	3,490,004	652.8%	668.5%	5.00%	0.5113
	2028	682	907,090	6,987,028	6,944,816	770.3%	765.6%	441,681	3,402,125	3,381,572	770.3%	765.6%	5.00%	0.4869
	2029	607	800,276	7,247,992	6,962,518	905.7%	870.0%	371,115	3,361,137	3,228,754	905.7%	870.0%	5.00%	0.4637
	2030	537	701,079	7,437,772	6,917,560	1060.9%	986.7%	309,632	3,284,900	3,055,147	1060.9%	986.7%	5.00%	0.4417
	2031	471	609,655	7,556,240	6,821,418	1239.4%	1118.9%	256,433	3,178,306	2,869,225	1239.4%	1118.9%	5.00%	0.4206
	2032	409	525,980	7,605,200	6,661,196	1445.9%	1266.4%	210,703	3,046,571	2,668,412	1445.9%	1266.4%	5.00%	0.4006
	2033	353	450,297	7,583,908	6,437,404	1684.2%	1429.6%	171,795	2,893,373	2,455,965	1684.2%	1429.6%	5.00%	0.3815
	2034	302	382,623	7,491,159	6,144,503	1957.8%	1605.9%	139,025	2,721,893	2,232,589	1957.8%	1605.9%	5.00%	0.3633
	2035	256	322,612	7,324,216	5,776,964	2270.3%	1790.7%	111,638	2,534,509	1,999,090	2270.3%	1790.7%	5.00%	0.3460
	2036	216	269,849	7,081,286	5,350,797	2624.2%	1982.9%	88,933	2,333,757	1,763,445	2624.2%	1982.9%	5.00%	0.3296
	2037	180	223,871	6,765,809	4,881,358	3022.2%	2180.4%	70,267	2,123,606	1,532,127	3022.2%	2180.4%	5.00%	0.3139
	2038	149	184,176	6,385,577	4,389,221	3467.1%	2383.2%	55,055	1,908,820	1,312,056	3467.1%	2383.2%	5.00%	0.2989
	2039	122	150,231	5,952,580	3,895,255	3962.3%	2592.8%	42,770	1,694,653	1,108,949	3962.3%	2592.8%	5.00%	0.2847
	2040	99	121,485	5,481,912	3,416,614	4512.4%	2812.4%	32,939	1,486,341	926,365	4512.4%	2812.4%	5.00%	0.2711
	2041	80	97,383	4,990,006	2,968,050	5124.1%	3047.8%	25,147	1,288,540	766,422	5124.1%	3047.8%	5.00%	0.2582
	2042	63	77,372	4,492,636	2,556,089	5806.5%	3303.6%	19,028	1,104,864	628,613	5806.5%	3303.6%	5.00%	0.2459
	2043	50	60,922	4,003,432	2,184,529	6571.4%	3585.8%	14,269	937,672	511,654	6571.4%	3585.8%	5.00%	0.2342
	2044	39	47,532	3,533,368	1,851,918	7433.7%	3896.1%	10,603	788,166	413,096	7433.7%	3896.1%	5.00%	0.2231
	2045	30	36,740	3,090,339	1,556,720	8411.4%	4237.1%	7,805	656,517	330,712	8411.4%	4237.1%	5.00%	0.2124
	2046	23	28,127	2,679,202	1,295,271	9525.3%	4605.0%	5,691	542,071	262,066	9525.3%	4605.0%	5.00%	0.2023
	2047	18	21,323	2,302,162	1,063,341	10796.8%	4986.9%	4,109	443,606	204,896	10796.8%	4986.9%	5.00%	0.1927
	2048	13	16,001	1,959,976	862,117	12249.1%	5387.9%	2,936	359,685	158,212	12249.1%	5387.9%	5.00%	0.1835
	2049	10	11,882	1,652,869	688,977	13910.1%	5798.3%	2,077	288,882	120,417	13910.1%	5798.3%	5.00%	0.1748
	2050	7	8,730	1,380,010	542,016	15808.5%	6209.0%	1,453	229,708	90,221	15808.5%	6209.0%	5.00%	0.1665
	2051	5	6,342	1,140,057	419,383	17975.1%	6612.4%	1,005	180,730	66,484	17975.1%	6612.4%	5.00%	0.1585
	2052	4	4,555	931,563	320,336	20449.5%	7031.9%	688	140,646	48,364	20449.5%	7031.9%	5.00%	0.1510
	Past		41,199,188	17,340,838	20,096,852	42.1%	48.8%	65,919,306	22,909,335	30,346,585	34.8%	46.0%		
	Future		33,196,852	186,504,253	159,109,489	561.8%	479.3%	23,050,169	84,014,200	78,709,261	364.5%	341.5%		
	Lifetime		74,396,039	203,845,090	179,206,342	274.0%	240.9%	88,969,474	106,923,535	109,055,846	120.2%	122.6%		

EXHIBIT XII
RiverSource Life Insurance Company
Incurred Loss Ratio Including the Change in Active Life Reserves
Nationwide Experience, without Interest
Policy Form: 30225

Calendar Year	(a) Earned Premiums [1]	(b) Incurred Claims	(c) Change in Active Life Reserves	(d) = (b+c)/(a) Loss Ratio
1992	145	0	2,281	1574.9%
1993	2,687,161	147,465	2,187,746	86.9%
1994	12,916,809	1,546,420	6,728,825	64.1%
1995	26,751,336	3,369,053	20,553,179	89.4%
1996	42,758,453	6,593,399	40,805,281	110.9%
1997	58,783,795	7,424,220	62,937,799	119.7%
1998	67,697,736	13,305,497	85,338,045	145.7%
1999	66,592,712	18,669,759	97,436,710	174.4%
2000	63,713,697	19,274,006	99,581,777	186.5%
2001	61,140,894	23,482,824	99,140,594	200.6%
2002	58,984,823	31,882,410	98,790,662	221.5%
2003	56,853,917	35,876,618	98,106,868	235.7%
2004	55,057,979	33,373,239	96,998,189	236.8%
2005	50,157,191	29,998,753	94,262,483	247.7%
2006	52,775,548	39,771,059	82,526,046	231.7%
2007	60,977,339	44,353,590	87,342,836	216.0%
2008	59,305,602	46,598,165	78,634,716	211.2%
2009	63,016,024	52,752,330	68,093,179	191.8%
2010	67,630,762	49,544,460	72,418,451	180.3%
2011	65,407,470	66,353,503	(20,112,060)	70.7%
2012	62,193,076	67,431,878	63,535,007	210.6%
1/2013-9/2013	48,200,249	56,489,129	31,678,715	182.9%
Total	1,103,602,716	648,237,776	1,366,987,327	182.6%

[1] Premiums reflect the accumulated 105.3% rate increases as approved in Virginia and implemented from 2006 through 2013 on a nationwide basis.

EXHIBIT XIII
RiverSource Life Insurance Company
Incurred Loss Ratio Including the Change in Active Life Reserves
Virginia Experience, without Interest
Policy Form: 30225-VA

Calendar Year	(a) Earned Premiums	(b) Incurred Claims	(c) Change in Active Life Reserves	(d) = (b+c)/(a) Loss Ratio
1992	0	0	0	0.0%
1993	98,888	0	62,482	63.2%
1994	418,230	387,631	219,685	145.2%
1995	902,340	213	716,313	79.4%
1996	1,529,333	155,443	1,483,297	107.2%
1997	2,145,118	826,897	2,527,099	156.4%
1998	2,525,593	1,429,632	3,453,710	193.4%
1999	2,386,879	679,862	4,031,957	197.4%
2000	2,297,144	21,598	4,034,887	176.6%
2001	2,227,711	805,162	4,048,401	217.9%
2002	2,167,337	1,571,307	4,066,188	260.1%
2003	2,102,370	1,381,359	4,072,728	259.4%
2004	2,035,594	1,529,432	4,067,764	275.0%
2005	1,964,083	716,605	4,650,193	273.2%
2006	2,068,834	1,314,435	2,875,871	202.5%
2007	2,293,050	965,508	3,462,246	193.1%
2008	2,228,600	1,247,936	3,715,408	222.7%
2009	2,362,148	2,092,374	3,207,960	224.4%
2010	2,564,764	1,007,494	3,532,788	177.0%
2011	2,515,138	1,974,607	97,227	82.4%
2012	2,450,850	894,884	3,656,709	185.7%
1/2013-9/2013	1,915,182	1,094,472	1,542,758	137.7%
Total	41,199,188	20,096,852	59,525,670	193.3%

EXHIBIT XIV

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	47.22	34.92	88.30	65.72	110.88	82.14
41	47.22	34.92	88.30	65.72	110.88	82.14
42	47.22	34.92	88.30	65.72	110.88	82.14
43	47.22	34.92	88.30	65.72	110.88	82.14
44	47.22	34.92	88.30	65.72	110.88	82.14
45	47.22	34.92	88.30	65.72	110.88	82.14
46	51.34	39.00	92.40	69.80	117.04	88.30
47	51.34	39.00	94.46	69.80	119.08	88.30
48	53.38	39.00	96.48	71.88	121.14	90.34
49	53.38	41.08	96.48	73.92	123.22	92.40
50	55.44	41.08	98.56	73.92	125.24	94.46
51	57.50	43.12	102.64	78.04	129.36	98.56
52	61.60	45.18	106.78	80.06	135.50	102.64
53	63.64	47.22	110.88	84.18	141.66	106.78
54	67.76	51.34	117.04	88.30	149.90	112.90
55	75.96	57.50	129.36	98.56	166.32	125.24
56	82.14	63.64	141.66	108.82	180.68	141.66
57	90.34	69.80	153.98	119.08	197.12	151.94
58	100.62	78.04	170.40	129.36	215.60	166.32
59	112.90	84.18	186.86	141.66	238.18	180.68
60	125.24	98.56	205.32	162.20	260.76	205.32
61	139.64	112.90	232.02	188.90	291.54	236.12
62	153.98	121.14	252.54	201.20	320.32	252.54
63	176.58	143.72	289.50	234.04	365.48	295.66
64	199.18	156.06	324.42	254.62	408.58	322.34
65	221.76	180.68	355.18	289.50	447.58	365.48
66	242.28	193.02	381.90	305.92	482.50	386.00
67	268.96	213.54	420.90	334.68	527.68	418.86
68	295.66	242.28	457.86	373.68	572.84	466.08
69	332.60	262.80	509.20	404.48	634.44	503.04
70	367.52	291.54	558.46	443.48	691.94	550.28
71	402.44	318.26	603.64	478.40	741.20	589.26
72	441.42	351.10	659.08	525.62	798.68	636.50
73	490.70	394.22	720.66	579.00	864.38	696.02
74	539.98	435.30	788.42	634.44	930.10	749.40
75	599.54	476.34	870.56	691.94	999.98	802.80
76	669.34	529.72	956.78	757.64	999.98	868.48
77	747.36	597.48	999.98	847.96	999.98	954.74
78	827.42	659.08	999.98	921.88	999.98	999.98
79	899.30	724.78	999.98	999.98	999.98	999.98

EXHIBIT XIV

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	36.96	26.68	65.72	47.22	82.14	59.54
41	36.96	26.68	65.72	47.22	82.14	59.54
42	36.96	26.68	65.72	47.22	82.14	59.54
43	36.96	26.68	65.72	47.22	82.14	59.54
44	36.96	26.68	65.72	47.22	82.14	59.54
45	36.96	26.68	65.72	47.22	82.14	59.54
46	39.00	28.76	67.76	49.26	86.22	61.60
47	41.08	28.76	69.80	49.26	88.30	63.64
48	41.08	28.76	69.80	51.34	88.30	63.64
49	41.08	30.80	71.88	53.38	90.34	65.72
50	43.12	30.80	73.92	53.38	92.40	65.72
51	45.18	32.84	75.96	57.50	100.62	71.88
52	47.22	32.84	78.04	57.50	102.64	73.92
53	49.26	34.92	82.14	59.54	104.72	75.96
54	53.38	36.96	86.22	61.60	110.88	80.06
55	57.50	41.08	94.46	67.76	123.22	88.30
56	63.64	47.22	104.72	75.96	133.46	98.56
57	69.80	51.34	112.90	84.18	143.72	106.78
58	78.04	57.50	125.24	90.34	158.10	114.98
59	86.22	61.60	137.56	98.56	174.52	125.24
60	96.48	71.88	151.94	114.98	190.94	143.72
61	106.78	84.18	170.40	131.40	213.54	166.32
62	119.08	90.34	184.78	141.66	234.04	176.58
63	135.50	104.72	211.46	164.26	266.92	207.36
64	151.94	114.98	236.12	178.62	299.76	225.86
65	170.40	133.46	260.76	203.28	328.50	256.64
66	184.78	141.66	279.24	215.60	353.16	271.04
67	207.36	158.10	308.00	234.04	388.06	293.60
68	227.88	176.58	336.74	260.76	420.90	326.44
69	254.62	193.02	371.64	283.34	464.00	353.16
70	281.30	213.54	408.58	310.02	507.12	386.00
71	308.00	234.04	441.42	334.68	544.12	412.68
72	340.84	258.70	482.50	367.52	585.14	445.56
73	377.78	289.50	527.68	406.54	632.38	486.62
74	414.74	320.32	576.96	445.56	681.68	525.62
75	461.98	351.10	638.52	484.56	739.16	560.54
76	515.36	390.10	700.14	529.72	804.84	607.76
77	574.88	439.40	776.08	593.38	874.64	667.28
78	636.50	484.56	847.96	644.70	942.42	718.62
79	691.94	533.84	913.66	704.24	999.98	767.90
80		581.04		755.58		819.22
81		630.34		813.08		872.62
82		687.82		872.62		934.20
83		749.40		944.48		999.88
84		811.00		999.98		999.98

EXHIBIT XIV

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	32.84	24.66	57.50	43.12	71.88	53.38
41	32.84	24.66	57.50	43.12	71.88	53.38
42	32.84	24.66	57.50	43.12	71.88	53.38
43	32.84	24.66	57.50	43.12	71.88	53.38
44	32.84	24.66	57.50	43.12	71.88	53.38
45	32.84	24.66	57.50	43.12	71.88	53.38
46	34.92	26.68	59.54	45.18	75.96	57.50
47	34.92	26.68	61.60	47.22	78.04	59.54
48	36.96	26.68	63.64	47.22	80.06	59.54
49	36.96	28.76	63.64	49.26	80.06	61.60
50	39.00	28.76	65.72	49.26	82.14	61.60
51	41.08	30.80	67.76	51.34	86.22	67.76
52	41.08	30.80	69.80	53.38	88.30	69.80
53	45.18	32.84	73.92	55.44	94.46	73.92
54	47.22	34.92	78.04	59.54	98.56	75.96
55	51.34	39.00	84.18	63.64	108.82	82.14
56	57.50	43.12	92.40	71.88	119.08	90.34
57	63.64	49.26	100.62	78.04	129.36	100.62
58	69.80	53.38	112.90	86.22	143.72	108.82
59	78.04	59.54	123.22	94.46	158.10	119.08
60	86.22	67.76	135.50	106.78	172.48	135.50
61	96.48	78.04	151.94	123.22	190.94	153.98
62	106.78	84.18	166.32	131.40	211.46	166.32
63	123.22	98.56	193.02	156.06	242.28	195.04
64	137.56	108.82	213.54	168.36	268.96	211.46
65	151.94	125.24	234.04	190.94	293.60	240.22
66	166.32	133.46	250.50	201.20	314.16	252.54
67	186.86	147.82	277.18	219.70	349.02	277.18
68	207.36	168.36	303.88	246.38	379.84	310.02
69	229.96	182.74	334.68	266.92	416.80	332.60
70	252.54	201.20	367.52	291.54	455.82	361.36
71	275.12	217.62	394.22	312.08	484.56	383.94
72	305.92	244.32	435.30	347.00	527.68	418.86
73	340.84	275.12	478.40	383.94	574.88	461.98
74	373.68	299.76	519.46	418.86	611.84	492.78
75	414.74	328.50	572.84	453.74	663.18	527.68
76	459.90	363.42	624.18	494.82	716.56	566.70
77	517.40	414.74	700.14	558.46	788.42	630.34
78	576.96	459.90	767.90	611.84	854.12	679.60
79	622.10	500.98	821.28	661.12	905.46	726.82
80		537.94		700.14		772.00
81		581.04		749.40		823.34
82		624.18		798.68		876.72
83		665.26		845.92		925.98
84		702.20		886.98		973.20

EXHIBIT XIV

RiverSource Life Insurance Company
Current Annual Premiums

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	28.76	20.52	49.26	36.96	61.60	45.18
41	28.76	20.52	49.26	36.96	61.60	45.18
42	28.76	20.52	49.26	36.96	61.60	45.18
43	28.76	20.52	49.26	36.96	61.60	45.18
44	28.76	20.52	49.26	36.96	61.60	45.18
45	28.76	20.52	49.26	36.96	61.60	45.18
46	28.76	22.58	51.34	39.00	63.64	47.22
47	30.80	22.58	53.38	39.00	65.72	49.26
48	30.80	22.58	53.38	39.00	65.72	49.26
49	30.80	22.58	53.38	39.00	67.76	51.34
50	32.84	24.66	55.44	41.08	69.80	55.44
51	32.84	24.66	57.50	43.12	71.88	57.50
52	34.92	26.68	59.54	45.18	75.96	59.54
53	36.96	28.76	61.60	47.22	78.04	61.60
54	39.00	28.76	65.72	49.26	84.18	61.60
55	43.12	32.84	71.88	53.38	92.40	69.80
56	49.26	34.92	80.06	57.50	102.64	73.92
57	53.38	41.08	86.22	65.72	110.88	84.18
58	59.54	45.18	94.46	71.88	121.14	92.40
59	65.72	49.26	104.72	80.06	131.40	100.62
60	75.96	55.44	119.08	88.30	149.90	110.88
61	82.14	61.60	129.36	96.48	162.20	121.14
62	92.40	69.80	145.78	110.88	184.78	139.64
63	104.72	75.96	162.20	119.08	205.32	149.90
64	121.14	86.22	186.86	135.50	236.12	170.40
65	133.46	96.48	203.28	147.82	256.64	186.86
66	149.90	106.78	225.86	162.20	283.34	203.28
67	164.26	117.04	244.32	172.48	308.00	217.62
68	180.68	131.40	266.92	193.02	332.60	240.22
69	197.12	141.66	287.46	205.32	359.30	256.64
70	213.54	156.06	308.00	225.86	381.90	279.24
71	234.04	170.40	334.68	242.28	412.68	297.72
72	254.62	184.78	361.36	262.80	439.40	318.26
73	277.18	203.28	386.00	285.40	464.00	342.86
74	303.88	223.80	420.90	310.02	496.86	365.48
75	334.68	242.28	461.98	334.68	533.84	388.06
76	369.58	268.96	503.04	365.48	579.00	418.86
77	410.64	299.76	554.36	404.48	622.10	455.82
78	451.72	330.58	601.58	441.42	669.34	490.70
79	494.82	361.36	654.94	476.34	714.52	529.72
80		394.22		513.30		568.72
81		431.16		554.36		613.92
82		470.16		597.48		661.12
83		513.30		644.70		710.40
84		560.54		696.02		763.80

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	54.30	40.16	101.54	75.58	127.52	94.46
41	54.30	40.16	101.54	75.58	127.52	94.46
42	54.30	40.16	101.54	75.58	127.52	94.46
43	54.30	40.16	101.54	75.58	127.52	94.46
44	54.30	40.16	101.54	75.58	127.52	94.46
45	54.30	40.16	101.54	75.58	127.52	94.46
46	59.04	44.86	106.26	80.28	134.60	101.54
47	59.04	44.86	108.62	80.28	136.94	101.54
48	61.38	44.86	110.96	82.66	139.32	103.90
49	61.38	47.24	110.96	85.00	141.70	106.26
50	63.76	47.24	113.34	85.00	144.02	108.62
51	66.12	49.58	118.04	89.74	148.76	113.34
52	70.84	51.96	122.80	92.06	155.82	118.04
53	73.18	54.30	127.52	96.80	162.90	122.80
54	77.92	59.04	134.60	101.54	172.38	129.84
55	87.36	66.12	148.76	113.34	191.26	144.02
56	94.46	73.18	162.90	125.14	207.78	162.90
57	103.90	80.28	177.08	136.94	226.68	174.74
58	115.72	89.74	195.96	148.76	247.94	191.26
59	129.84	96.80	214.88	162.90	273.90	207.78
60	144.02	113.34	236.12	186.54	299.88	236.12
61	160.58	129.84	266.82	217.24	335.28	271.54
62	177.08	139.32	290.42	231.38	368.36	290.42
63	203.06	165.28	332.92	269.14	420.30	340.00
64	229.06	179.46	373.08	292.82	469.86	370.70
65	255.02	207.78	408.46	332.92	514.72	420.30
66	278.62	221.98	439.18	351.80	554.88	443.90
67	309.30	245.58	484.04	384.88	606.84	481.68
68	340.00	278.62	526.54	429.74	658.76	536.00
69	382.50	302.22	585.58	465.16	729.60	578.50
70	422.64	335.28	642.22	510.00	795.74	632.82
71	462.80	366.00	694.18	550.16	852.38	677.64
72	507.64	403.76	757.94	604.46	918.48	731.98
73	564.30	453.36	828.76	665.86	994.04	800.42
74	620.98	500.60	906.68	729.60	999.98	861.82
75	689.48	547.80	999.98	795.74	999.98	923.22
76	769.74	609.18	999.98	871.28	999.98	998.76
77	859.46	687.10	999.98	975.16	999.98	999.98
78	951.54	757.94	999.98	999.98	999.98	999.98
79	999.98	833.50	999.98	999.98	999.98	999.98

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	42.50	30.68	75.58	54.30	94.46	68.48
41	42.50	30.68	75.58	54.30	94.46	68.48
42	42.50	30.68	75.58	54.30	94.46	68.48
43	42.50	30.68	75.58	54.30	94.46	68.48
44	42.50	30.68	75.58	54.30	94.46	68.48
45	42.50	30.68	75.58	54.30	94.46	68.48
46	44.86	33.08	77.92	56.64	99.16	70.84
47	47.24	33.08	80.28	56.64	101.54	73.18
48	47.24	33.08	80.28	59.04	101.54	73.18
49	47.24	35.42	82.66	61.38	103.90	75.58
50	49.58	35.42	85.00	61.38	106.26	75.58
51	51.96	37.76	87.36	66.12	115.72	82.66
52	54.30	37.76	89.74	66.12	118.04	85.00
53	56.64	40.16	94.46	68.48	120.42	87.36
54	61.38	42.50	99.16	70.84	127.52	92.06
55	66.12	47.24	108.62	77.92	141.70	101.54
56	73.18	54.30	120.42	87.36	153.48	113.34
57	80.28	59.04	129.84	96.80	165.28	122.80
58	89.74	66.12	144.02	103.90	181.82	132.22
59	99.16	70.84	158.20	113.34	200.70	144.02
60	110.96	82.66	174.74	132.22	219.58	165.28
61	122.80	96.80	195.96	151.12	245.58	191.26
62	136.94	103.90	212.50	162.90	269.14	203.06
63	155.82	120.42	243.18	188.90	306.96	238.46
64	174.74	132.22	271.54	205.42	344.72	259.74
65	195.96	153.48	299.88	233.78	377.78	295.14
66	212.50	162.90	321.12	247.94	406.14	311.70
67	238.46	181.82	354.20	269.14	446.26	337.64
68	262.06	203.06	387.26	299.88	484.04	375.40
69	292.82	221.98	427.38	325.84	533.60	406.14
70	323.50	245.58	469.86	356.52	583.18	443.90
71	354.20	269.14	507.64	384.88	625.74	474.58
72	391.96	297.50	554.88	422.64	672.92	512.40
73	434.44	332.92	606.84	467.52	727.24	559.62
74	476.96	368.36	663.50	512.40	783.94	604.46
75	531.28	403.76	734.30	557.24	850.04	644.62
76	592.66	448.62	805.16	609.18	925.56	698.92
77	661.12	505.32	892.50	682.38	999.98	767.38
78	731.98	557.24	975.16	741.40	999.98	826.42
79	795.74	613.92	999.98	809.88	999.98	883.08
80		668.20		868.92		942.10
81		724.90		935.04		999.98
82		791.00		999.98		999.98
83		861.82		999.98		999.98
84		932.66		999.98		999.98

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	37.76	28.36	66.12	49.58	82.66	61.38
41	37.76	28.36	66.12	49.58	82.66	61.38
42	37.76	28.36	66.12	49.58	82.66	61.38
43	37.76	28.36	66.12	49.58	82.66	61.38
44	37.76	28.36	66.12	49.58	82.66	61.38
45	37.76	28.36	66.12	49.58	82.66	61.38
46	40.16	30.68	68.48	51.96	87.36	66.12
47	40.16	30.68	70.84	54.30	89.74	68.48
48	42.50	30.68	73.18	54.30	92.06	68.48
49	42.50	33.08	73.18	56.64	92.06	70.84
50	44.86	33.08	75.58	56.64	94.46	70.84
51	47.24	35.42	77.92	59.04	99.16	77.92
52	47.24	35.42	80.28	61.38	101.54	80.28
53	51.96	37.76	85.00	63.76	108.62	85.00
54	54.30	40.16	89.74	68.48	113.34	87.36
55	59.04	44.86	96.80	73.18	125.14	94.46
56	66.12	49.58	106.26	82.66	136.94	103.90
57	73.18	56.64	115.72	89.74	148.76	115.72
58	80.28	61.38	129.84	99.16	165.28	125.14
59	89.74	68.48	141.70	108.62	181.82	136.94
60	99.16	77.92	155.82	122.80	198.36	155.82
61	110.96	89.74	174.74	141.70	219.58	177.08
62	122.80	96.80	191.26	151.12	243.18	191.26
63	141.70	113.34	221.98	179.46	278.62	224.30
64	158.20	125.14	245.58	193.62	309.30	243.18
65	174.74	144.02	269.14	219.58	337.64	276.26
66	191.26	153.48	288.08	231.38	361.28	290.42
67	214.88	170.00	318.76	252.66	401.38	318.76
68	238.46	193.62	349.46	283.34	436.82	356.52
69	264.46	210.16	384.88	306.96	479.32	382.50
70	290.42	231.38	422.64	335.28	524.20	415.56
71	316.38	250.26	453.36	358.90	557.24	441.54
72	351.80	280.96	500.60	399.06	606.84	481.68
73	391.96	316.38	550.16	441.54	661.12	531.28
74	429.74	344.72	597.38	481.68	703.62	566.70
75	476.96	377.78	658.76	521.80	762.66	606.84
76	528.88	417.94	717.80	569.04	824.04	651.70
77	595.02	476.96	805.16	642.22	906.68	724.90
78	663.50	528.88	883.08	703.62	982.24	781.54
79	715.42	576.12	944.48	760.28	999.98	835.84
80		618.64		805.16		887.80
81		668.20		861.82		946.84
82		717.80		918.48		999.98
83		765.04		972.80		999.98
84		807.54		999.98		999.98

EXHIBIT XV

RiverSource Life Insurance Company
Annual Premiums with 15% Rate Increase

Nursing Home Indemnity Policy
FORM: 30225-VA

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*
40	33.08	23.60	56.64	42.50	70.84	51.96
41	33.08	23.60	56.64	42.50	70.84	51.96
42	33.08	23.60	56.64	42.50	70.84	51.96
43	33.08	23.60	56.64	42.50	70.84	51.96
44	33.08	23.60	56.64	42.50	70.84	51.96
45	33.08	23.60	56.64	42.50	70.84	51.96
46	33.08	25.96	59.04	44.86	73.18	54.30
47	35.42	25.96	61.38	44.86	75.58	56.64
48	35.42	25.96	61.38	44.86	75.58	56.64
49	35.42	25.96	61.38	44.86	77.92	59.04
50	37.76	28.36	63.76	47.24	80.28	63.76
51	37.76	28.36	66.12	49.58	82.66	66.12
52	40.16	30.68	68.48	51.96	87.36	68.48
53	42.50	33.08	70.84	54.30	89.74	70.84
54	44.86	33.08	75.58	56.64	96.80	70.84
55	49.58	37.76	82.66	61.38	106.26	80.28
56	56.64	40.16	92.06	66.12	118.04	85.00
57	61.38	47.24	99.16	75.58	127.52	96.80
58	68.48	51.96	108.62	82.66	139.32	106.26
59	75.58	56.64	120.42	92.06	151.12	115.72
60	87.36	63.76	136.94	101.54	172.38	127.52
61	94.46	70.84	148.76	110.96	186.54	139.32
62	106.26	80.28	167.64	127.52	212.50	160.58
63	120.42	87.36	186.54	136.94	236.12	172.38
64	139.32	99.16	214.88	155.82	271.54	195.96
65	153.48	110.96	233.78	170.00	295.14	214.88
66	172.38	122.80	259.74	186.54	325.84	233.78
67	188.90	134.60	280.96	198.36	354.20	250.26
68	207.78	151.12	306.96	221.98	382.50	276.26
69	226.68	162.90	330.58	236.12	413.20	295.14
70	245.58	179.46	354.20	259.74	439.18	321.12
71	269.14	195.96	384.88	278.62	474.58	342.38
72	292.82	212.50	415.56	302.22	505.32	366.00
73	318.76	233.78	443.90	328.22	533.60	394.28
74	349.46	257.38	484.04	356.52	571.38	420.30
75	384.88	278.62	531.28	384.88	613.92	446.26
76	425.02	309.30	578.50	420.30	665.86	481.68
77	472.24	344.72	637.52	465.16	715.42	524.20
78	519.48	380.16	691.82	507.64	769.74	564.30
79	569.04	415.56	753.18	547.80	821.70	609.18
80		453.36		590.30		654.02
81		495.84		637.52		706.00
82		540.68		687.10		760.28
83		590.30		741.40		816.96
84		644.62		800.42		878.38