



INS CONSULTANTS, INC.

Insurance Regulatory Consultants

419 S. 2nd Street
New Market, Suite 206
Philadelphia, PA 19147
Phone: (215) 625-9877
Fax: (215) 627-7104

TO: Rhonda West, Regulatory Specialist
Delaware Insurance Department

FROM: Arthur Lucker, FSA, MAAA
INS Consultants, Inc.

DATE: December 2, 2012

SUBJECT: Unum Life Insurance Company of America
Group Long Term Care Rate Revision Filing
Policy Forms: B.LTC, TQB.LTC, GLTC95 and TQGLTC95
Delaware Tracking Number: 49661

Unum Life Insurance Company of America (UNUM) filed for approval of a 75% rate revision for the subject forms. With regard to Delaware's Cost Disclosure requirements, the Company may not increase the premium by more than 25% during any three year rating period under the subject forms.

In the filing, UNUM included the applicable rate schedules and a supporting actuarial memorandum. In the actuarial memorandum, UNUM included a description of the assumptions underlying the projection of future experience, historical national experience, and a projection of future national experience.

The Company indicated that there are 921 certificates in force in Delaware.

After a review of the material filed in support of the subject rate filing, INS requested on August 27, 2012 historical experience by issue year within calendar year for the subject forms. On August 29 2012, the Company responded to our request.

INS has reviewed the submission in its entirety. Additionally, INS has performed an independent projection of future national experience for the subject forms. INS has not performed an independent projection of future Delaware experience because Delaware historical experience is not sufficiently credible for the purpose of this analysis. From our analysis of the subject policy forms, we suggest that the rate revision of 25% is actuarially justified. We base this conclusion on the requirements of Section 19.2 of Regulation 1404, the loss ratio results developed from our independent projection and the inequality test required by Section 20.3.2 of Regulation 1404.

Since the requirements of Section 19.2 and Section 20.3.2 of Regulation 1404 are satisfied, INS suggests that the rate increase of 25% appears to be actuarially justified.