AMENDMENT OF APPENDIX A TO THE OPERATING PROCEDURE FOR THE FILING AND APPROVAL OF PRODUCT FILINGS

1. Date Adopted: To be determined

2. Purpose and Scope: The purpose of this rule is to amend Appendix A of the Operating Procedure for the Filing and Approval of Product Filings (the “Product Filing Rule”). The amendment would add two additional uniform standards to the list of products eligible for combination with a State Product Component under the framework established in § 110 of the Product Filing Rule. The additional products, which are Standards for Forms Used to Exclude Policy Coverage Based on the Underwriting Process and Standards for Riders, Endorsements or Amendments Used to Effect Individual Life Insurance Policy Changes, would fall into the Individual and the Group Life Benefit Features product lines.

3. Rules Repealed, Amended or Suspended by the Rule: This rule would amend the Operating Procedure for the Filing and Approval of Product Filings.

4. Statutory Authority: Among the primary purposes and powers of the Interstate Insurance Product Regulation Commission (“IIPRC”) is to establish reasonable uniform standards for the insurance products covered in the Interstate Insurance Product Regulation Compact (“Compact”), specifically pursuant to Article I §2, Article IV §2 and Article VII §1 of the Compact, as enacted into law by each IIPRC member state.

5. Required Findings: None

6. Effective Date: To be determined
Note: See pages 4 and 7 for amendment.

APPENDIX A
TO
INTERSTATE INSURANCE PRODUCT REGULATION COMMISSION
OPERATING PROCEDURE
FOR THE FILING AND APPROVAL OF PRODUCT FILINGS

INTRODUCTORY INFORMATION

i. Product Lines
For purposes of Section 110 of this Operating Procedure only, the available product lines and their contents are set forth in this Appendix. There are 19 product lines.

<table>
<thead>
<tr>
<th>Product Line</th>
<th>Cutoff Date</th>
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<tbody>
<tr>
<td>Individual Applications (See introductory paragraph ii.)</td>
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<tr>
<td>Individual Term Life Insurance</td>
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<td>Individual Whole Life Insurance</td>
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<tr>
<td>Individual Endowment Insurance</td>
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<td>Individual Non-Variable Adjustable Life Insurance</td>
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<td>Individual Variable Adjustable Life Insurance</td>
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<td>Individual Variable Annuity</td>
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<tr>
<td>Individual Non-Variable Annuity</td>
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<tr>
<td>Individual Long Term Care Insurance</td>
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<tr>
<td>Individual Disability Income Insurance</td>
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<tr>
<td>Group Applications (See introductory paragraph ii.)</td>
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<tr>
<td>Group Term Life Insurance</td>
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<tr>
<td>Group Accidental Death &amp; Dismemberment Insurance</td>
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<tr>
<td>Group Whole Life Insurance</td>
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<td>Group Non-Variable Adjustable Life Insurance</td>
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<td>Group Variable Adjustable Life Insurance</td>
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<tr>
<td>Group Disability Income Insurance</td>
<td></td>
</tr>
</tbody>
</table>

The Product Line Cutoff Date applicable to each product line, as defined in the Operating Procedure for the Filing and Approval of Product Filings, shall be published as soon as practicable on the official website of the IIPRC and any other means the IIPRC may designate, including the System for Electronic Rate and Form Filing (SERFF).

ii. Applications
The applications for individual and group insurance and annuity products are divided into two product lines. In recognition of the significance placed on universal applications in the creation of the “mix and match” concept, the Product Standards Committee recommends that the Product Line Cutoff Date for the Individual Applications and Group Applications product lines run concurrently with the last-approved non-application product standards that are included in the appendix. In other words, the two year clock for mixing and matching a Commission-approved individual application with state-approved individual policy forms will not begin to tick until the last of the Appendix A uniform standards for individual products is adopted.

For example, if the last individual policy form standards approved are the Individual Disability Income Insurance Policy Standards, the Product Line Cutoff Date for those standards will be the same as the Product Line Cutoff Date applicable to the Individual Life Insurance Application Standards, Individual Annuity Application Standards, Individual Long Term Care Insurance Application Standards and Individual Disability Income Application Standards.
This treatment of application standards is not intended to delay the Commission’s review and adoption of application standards. Rather, the adoption and effective dates for application standards would proceed normally, but for purposes of Appendix A, the Product Line Cutoff Date would be deferred as described.

iii. Benefit Features
Benefit features shall be available for purposes of combining IIPRC Product Components and State Product Components only for as long as the particular product line the benefit feature is associated with remains open for combining. For example, after the Product Line Cutoff Date for product line X, a benefit feature is closed for purposes of being used with IIPRC Product Components in product line X for combining with State Product Components. To the extent the same benefit feature is applicable to product line Y, it may continue to be combined with State Product Components while product line Y remains open. Because benefit features may be applicable to multiple product lines, they are not considered a separate product line and are listed in sections G and R for information only.

iv Effect of Amendments to Standards
Any amendment to an adopted standard shall not operate to extend or otherwise affect the Product Line Cutoff Date applicable to the amended product.

v. Transition to Core Standards
The intent of the Product Standards Committee is to transition to the development of core standards for each product line, with certain product features such as premium mode, account type and annuitization options being addressed in the core standards. This effort would begin with annuity standards. The individual life insurance standards that have been adopted or are pending adoption would remain as separate product standards for purposes of Appendix A and eventually be collapsed into core standards via conforming amendment. Product concepts on the horizon will be held outside of Appendix A for future consideration. The Product Standards Committee reserves the right to adjust which product concepts are addressed by the core standards as the process develops.

vi. Adoption: Effective Date
This Appendix was adopted by the Commission on December 1, 2007, pursuant to the procedures set forth in the Rule for Adoption, Amendment and Repeal of Rules for the Interstate Insurance Product Regulation Commission. This Appendix is effective on December 1, 2007.

A. INDIVIDUAL APPLICATION PRODUCT LINE

See introductory paragraph ii for more information about this product line.

1. Individual Life Insurance Application Standards
2. Individual Annuity Application Standards
3. Individual Long Term Care Insurance Application Standards
4. Individual Disability Income Insurance Application Standards
5. Standards for Application Change Form (to reflect “issued on a basis other than as applied for”) to address life, annuities, long term care and disability income
6. Standards for Policy/Contract Changes (Reinstatement, etc.) to address life, annuities, long term care and disability income

B. INDIVIDUAL TERM LIFE PRODUCT LINE

1. Individual Term Life Insurance Policy
2. Individual Single Premium Term Life Insurance Policy
3. Individual Joint Last to Die Survivorship Term Life Insurance Policy
4. Individual Single Premium Joint Last to Die Survivorship Term Life Insurance Policy
5. Benefit features used in conjunction with items 1-4

C. INDIVIDUAL WHOLE LIFE PRODUCT LINE

1. Individual Whole Life Insurance Policy
As recommended by the Product Standards Committee

2. Individual Single Premium Whole Life Insurance Policy
3. Individual Joint Last to Die Survivorship Whole Life Insurance Policy
4. Individual Single Premium Joint Last to Die Survivorship Whole Life Insurance Policy
5. Individual Current Assumption Whole Life Insurance Policy
6. Benefit features used in conjunction with items 1-5

D. INDIVIDUAL ENDOWMENT INSURANCE PRODUCT LINE

1. Individual Endowment Insurance Policy
2. Individual Single Premium Endowment Insurance Policy
3. Individual Joint Last to Die Survivorship Endowment Insurance Policy
4. Individual Single Premium Joint Last to Die Survivorship Endowment Insurance Policy
5. Benefit features used in conjunction with items 1-4

E. INDIVIDUAL NON-VARIABLE ADJUSTABLE LIFE INSURANCE PRODUCT LINE

1. Individual Flexible Premium Adjustable Life Insurance Policy
2. Individual Joint Last to Die Survivorship Flexible Premium Adjustable Life Insurance Policy
3. Individual Modified Single Premium Adjustable Life Insurance Policy
4. Benefit features used in conjunction with items 1-3

F. INDIVIDUAL VARIABLE ADJUSTABLE LIFE INSURANCE PRODUCT LINE

1. Individual Modified Single Premium Variable Life Insurance Policy
2. Individual Modified Single Premium Joint First to Die Variable Life Insurance Policy
3. Individual Flexible Premium Variable Adjustable Life Insurance Policy
4. Individual Joint Last to Die Survivorship Flexible Premium Variable Adjustable Life Insurance Policy
5. Benefit features used in conjunction with items 1-4

G. STANDARDS FOR INDIVIDUAL LIFE BENEFIT FEATURES

See introductory paragraph iii for more information about benefit features.

1. Standards for All Benefit Features Added by Rider, Endorsement or Amendment to an Individual Life Policy
2. Accidental Death Benefits
3. Accidental Death & Dismemberment Benefits
4. Accelerated Death Benefits
5. Waiver of Premium Benefit
6. Waiver of Monthly Deduction Benefit
7. Waiver of Premium Benefit for Child Insurance in the Event of Payor’s Total Disability or Death
8. Additional Life Insurance Benefits Provided on a Guaranteed Insurability Basis
9. Additional Term Life Benefits
10. Tax Qualified Plan Provisions (generic for IRS Codes such as 403(b), 457(b), etc.)
11. Standards for Forms Used to Exclude Coverage Based on the Underwriting Process
12. Standards for Riders, Endorsements or Amendments Used to Effect Individual Life Insurance Policy Changes

H. INDIVIDUAL VARIABLE ANNUITY PRODUCT LINE

1. Individual Deferred Variable Annuity Contracts addressing:
   a. Flexible Premium
   b. Fixed Premium
   c. Single Premium
   d. Modified Single Premium
   e. Limited Payment Period
   f. Separate and General Accounts
   g. Separate Accounts Only
   h. Waiver of Surrender Charge Benefits
Draft: 4/28/08
Amendment to Appendix A
As recommended by the Product Standards Committee

i. Guaranteed Minimum Living Benefits (Income, Withdrawal, Guaranteed Accumulation (Guaranteed Account Value))

j. Guaranteed Minimum Death Benefits (Basic, Ratchet, Re-Set, Roll-Up, Enhanced Earnings, Combo Ratchet/Roll-Up)

k. Bonus Feature Benefits (Interest, Persistency, Premium, Annuitization)

l. Longevity Annuity Benefits

m. Guarantee of Principal Benefits (Return of Premium)

n. Tax Qualified Plan Provisions (generic for IRS Codes such as Keogh, IRA, Roth, SEP, TSA, 403(b), Charitable Gift Trust, etc.)

o. Private Placement

2. Individual Immediate Variable Annuity Contract addressing:
   a. Single Premium
   b. Separate Accounts only
   c. Separate and General Accounts
   d. Inflation Protection Benefits
   e. Nursing Home Payout Increase Benefits
   f. Liquidity Benefits other than Commutation (currently excluded form scope of SPIAs)
   g. Tax Qualified Plan Provisions (generic for IRS Codes such as Keogh, IRA, Roth, SEP, TSA, 403(b), Charitable Gift Trust, etc.)

I. INDIVIDUAL NON-VARIABLE ANNUITY PRODUCT LINE

1. Individual Deferred Non-Variable Annuity Contracts addressing:
   a. Flexible Premium
   b. Fixed Premium
   c. Single Premium
   d. Modified Single Premium
   e. Limited Payment Period
   f. Index-Linked Crediting Feature
   g. Market Value Adjusted
   h. Waiver of Surrender Charge Benefits
   i. Guaranteed Minimum Living Benefits (Income, Withdrawal, Guaranteed Accumulation (Guaranteed Account Value))
   j. Guaranteed Minimum Death Benefits (Basic, Ratchet, Re-Set, Roll-Up, Enhanced Earnings, Combo Ratchet/Roll-Up)
   k. Bonus Feature Benefits (Interest, Persistency, Premium, Annuitization)
   l. Longevity Annuity Benefits
   m. Guarantee of Principal Benefits (Return of Premium)
   n. Tax Qualified Plan Provisions (generic for IRS Codes such as Keogh, IRA, Roth, SEP, TSA, 403(b), Charitable Gift Trust, etc.)

2. Individual Immediate Non-Variable Annuity Contract Standards addressing:
   a. Flexible Premium
   b. Single Premium
   c. Modified Single Premium
   d. Inflation Protection Benefits
   e. Nursing Home Payout Increase Benefits
   f. Liquidity Benefits other than Commutation (currently excluded form scope of SPIAs)
   g. Tax Qualified Plan Provisions (generic for IRS Codes such as Keogh, IRA, Roth, SEP, TSA, 403(b), Charitable Gift Trust, etc.)

J. INDIVIDUAL LONG TERM CARE INSURANCE PRODUCT LINE

1. Individual Long Term Care Insurance Policy Standards addressing:
   a. Outline of Coverage
   b. Suitability: Personal Worksheet and Information Sheet

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c. Disclosure of Rating Practices to Consumer
d. Potential Rate Increase Disclosure Form
e. Replacement Disclosure Form
f. Waiver of Premium Benefits
g. Return of Premium Benefits
h. Restoration Benefits
i. Inflation Protection Benefits
j. Nonforfeiture Benefits
k. Home Health and Community Care Benefits

K. INDIVIDUAL DISABILITY INCOME INSURANCE PRODUCT LINE

1. Individual Disability Income Insurance Policy Standards addressing:
   a. Policy Marketed to Employer/Association Groups
   b. Buy-Sell
   c. Key Person/Business Protection
   d. Business Overhead Expense
   e. Individual Disability Income Insurance Outline of Coverage (addressing specialized products)
   f. Return of Premium Benefits

L. GROUP APPLICATION PRODUCT LINE

See introductory paragraph ii for more information about this product line.

1. Group Life Insurance Application and Enrollment Form Standards
2. Group Annuity Application and Enrollment Form Standards
3. Group Long Term Care Insurance Application and Enrollment Form Standards
4. Group Disability Income Insurance Application and Enrollment Form Standards
5. Standards for Application Change Form (to reflect “issued on a basis other than as applied for”) to address life, annuities, long term care and disability income
6. Standards for Policy/Contract Changes (Reinstatement, etc.) to address life, annuities, long term care and disability income

M. GROUP TERM LIFE INSURANCE PRODUCT LINE

1. Group Term Life Insurance Policy and Certificate Standards addressing:
   a. Single Premium
   b. First to Die/Last to Die Survivorship
   c. With Graded Death Benefits
   d. With Employee and Dependent Benefits

N. GROUP ACCIDENTAL DEATH & DISMEMBERMENT INSURANCE PRODUCT LINE

1. Group Accidental Death and Dismemberment Insurance Policy and Certificate Standards addressing:
   a. Employee and Dependent Benefits

O. GROUP WHOLE LIFE INSURANCE PRODUCT LINE

1. Group Whole Life Insurance Policy and Certificate Standards addressing:
   a. Single Premium
   b. With Graded Death Benefits
   c. Employee and Dependent Benefits

P. GROUP NON-VARIABLE ADJUSTABLE LIFE INSURANCE PRODUCT LINE

1. Group Adjustable Life Insurance Policy and Certificate Standards addressing:
   a. Employee and Dependent Benefits
Q. GROUP VARIABLE ADJUSTABLE LIFE INSURANCE PRODUCT LINE

1. Group Flexible Premium Variable Adjustable Life Insurance Policy and Certificate Standards addressing:
   a. Employee and Dependent Benefits
   b. Private Placement

R. STANDARDS FOR GROUP LIFE INSURANCE BENEFIT FEATURES

See introductory paragraph iii for more information about benefit features.

1. Standards for All Benefit Features Added by Rider, Endorsement or Amendment to a Group Life Insurance Policy and Certificate
2. Accidental Death Benefits
3. Accidental Death & Dismemberment Benefits
4. Accelerated Death Benefits
5. Waiver of Premium Benefit
6. Waiver of Monthly Deduction Benefit
7. Waiver of Premium Benefit for Child Insurance in the Event of Payor’s Total Disability or Death
8. Additional Life Insurance Benefits Provided on a Guaranteed Insurability Basis
9. Additional Term Life Benefits
10. Tax Qualified Plan Provisions (generic for IRS Codes such as Keogh, IRA, Roth, SEP, TSA, 403(b), Charitable Gift Trust, etc.)

11. Standards for Forms Used to Exclude Coverage Based on the Underwriting Process
12. Standards for Riders, Endorsements or Amendments Used to Effect Group Life Insurance Policy Changes

S. GROUP ANNUITY PRODUCT LINE

1. Group Allocated Annuity Contract and Certificate Standards addressing:
   a. General Account Only
   b. Separate Account Only
   c. General and Separate Account
   d. Fixed Annuitzation
   e. Variable Annuitzation
   f. Fixed or Variable Annuitzation
   g. Guaranteed Investment/Income/Interest Products (GICs) with or without a Defined Maturity Date
   h. Synthetic Guaranteed Investment/Income/Interest Products (GICs) (Company does not own assets) with or without a Defined Maturity Date
   i. Terminal Funding/Close Out Products
   j. Funding Agreement
   k. Tax Qualified Plan Provisions (generic for IRS Codes such as Keogh, IRA, Roth, SEP, TSA, 403(b), Charitable Gift Trust, etc.)

2. Group Unallocated Annuity Contract and Certificate Standards addressing:
   a. General Account Only
   b. Separate Account Only
   c. General and Separate Account
   d. Fixed Annuitzation
   e. Variable Annuitzation
   f. Fixed or Variable Annuitzation
   g. Guaranteed Investment/Income/Interest Products (GICs) with or without a Defined Maturity Date
   h. Synthetic Guaranteed Investment/Income/Interest Products (GICs) (Company does not own assets) with or without a Defined Maturity Date
   i. Funding Agreement
   j. Tax Qualified Plan Provisions (generic for IRS Codes such as Keogh, IRA, Roth, SEP, TSA, 403(b), Charitable Gift Trust, etc.)

3. Group Deferred Annuity Contract and Certificate Standards addressing:
   a. Flexible Premium
b. Fixed Premium 
   c. Single Premium 
   d. Modified Single Premium 

4. Group Immediate Annuity Contract and Certificate Standards addressing: 
   a. Flexible Premium 
   b. Fixed Premium 
   c. Single Premium 
   d. Modified Single Premium 

T. GROUP LONG TERM CARE INSURANCE PRODUCT LINE 

1. Group Long Term Care Insurance Policy and Certificate Standards addressing: 
   a. Outline of Coverage 
   b. Suitability: Personal Worksheet and Information Sheet 
   c. Replacement Disclosure Form 
   d. Medicare Supplemental Disclosure Form 
   e. Waiver of Premium Benefits 
   f. Return of Premium Benefits 
   g. Restoration Benefits 

U. GROUP DISABILITY INCOME INSURANCE PRODUCT LINE 

1. Group Disability Income Insurance Policy and Certificate Standards addressing: 
   a. Buy-Sell 
   b. Key Person/Business Protection 
   c. Business Overhead Expense 
   d. Employee and Dependent Benefits 
   e. Return of Premium Benefits