INTERROGATORIES

(To be answered for direct plus assumed business in the aggregate. Amounts should be provided on both a gross basis and net of reinsurance ceded.)

Note: The purpose of these interrogatories is to assess stress liquidity exposure and financial flexibility for coping with both expected and unexpected cash demands. Reasonable groupings of like instruments may be used where specific asset and liability information is sought. However, there should be sufficient delineation to identify material differences. All responses are expected to be in the spirit of this exercise. There should be no material omissions. The analysis should be done only for the general account, including general account guarantees associated with separate account products, since liquidity within the separate account is not available to fund liquidity crises in the general account.

1. Describe your company's liquidity policy, particularly as it relates to coping with stress conditions.

2. Does your company have a formal written liquidity plan? If yes, provide an overview, particularly as it relates to coping with stress conditions. If not, explain why a written liquidity plan is not necessary.

3. Describe how your company would respond to an immediate and material cash demand, such as could be triggered by a rating agency downgrade.

4. Through withdrawal, surrender, loan, scheduled maturity, or other contractual options, what is the maximum possible amount of large* or institutional** cash demands on the company within the next 7 days? 14 days? 30 days? Describe such cash demands, including any contractual deferral terms and conditions or lack thereof. The aggregate amounts deferrable should be listed separately for each major type of deferral provision; however, the amount deferrable need not be shown contract by contract.

5. What is the maximum amount of cash demands, other than those identified in Interrogatory No.4, on the company through surrender, loan, scheduled maturity or withdrawal? Describe such liabilities, including the withdrawal characteristics and a brief explanation of any deferral terms and conditions, including but not limited to the effect of any side agreements that may exist outside the formal contracts. Indicate the portions of such amounts that are contractually deferrable, e.g., as under the 6-month deferral per Section 4223(a)(1)(B) or 4221(a)(9) of the Insurance Law.

6. What is the sum of the total statement value and accrued interest of cash, cash equivalents, US and Canadian government obligations, US and Canadian government backed obligations, and publicly traded corporate investment grade obligations that mature within one year? [Note: The phrase "mature within one year" refers to cash equivalents, government, government-backed and corporate investment grade obligations.] By appropriate asset groupings, provide the total market value of all other assets of the company that can be readily liquidated (i.e., within 7 days) without a

material market value loss. Assets with similar liquidity profiles may be grouped. Provide the rationale for determining asset groupings as they relate to liquidity characteristics. For each asset grouping, explain the criteria for determining a material market value loss, including a percentage estimate of the expected loss due to a forced sale of assets and the basis for such estimate.

7. If your company is rated by a rating agency, provide a summary of the most recent liquidity analysis results provided by each such rating agency. What were the key findings of such analysis? For this purpose, a copy of the detailed rating agency write-up, with all appropriate liquidity sections highlighted will suffice. Based on these findings, what, if any, changes does the company plan to implement in its liquidity management process? Has there been any significant change in your company's liquidity position since the effective date of the liquidity analysis results?

8. To the extent that reserves for products with cash values are ceded: a) describe and quantify all material reinsurance arrangements with reinsurers that are not accredited in New York; b) describe and quantify all material reinsurance arrangements with New York accredited reinsurers other than those that provide reinsurance strictly for mortality and/or morbidity risks; c) describe the rationale for determining materiality as it relates to potential stress liquidity; and d) describe and quantify all reinsurance provisions, whether assumed or ceded, that include rating downgrade "put" provisions.

9. What level, expressed as a percentage of admitted assets, of equity and debt instruments does the company have invested in, or backed by, an affiliated company? Do these assets support liabilities or surplus? To the extent such assets support liabilities, provide an appropriate description and rationale.

10. Describe all standby lines of credit and other liquidity facilities that the company currently provides to other parties or has committed to provide to other parties, including affiliates, customers, etc. Indicate the amount of credit provided, the terms and conditions, and the remuneration paid to the company for each such agreement. Agreements relating strictly to new agent financing may be excluded.

If you have a formal written liquidity plan, as described in Interrogatory No. 2, or if your company has total net admitted assets of less than $100 million, as of 12/31/00, you need not complete Interrogatories 11 through 24. In any event, please be advised that additional questions may be forthcoming after we review the information provided.

11. What is the total value of general account assets and liabilities of the company on both a book and market value basis? Note: For the "market value" of liabilities use the definition in Section 95.10(i) of Regulation 126 or a reasonable proxy thereof, with appropriate explanation.

12. What is the total liquidity exposure, as of 12/31/00, produced by guarantees associated with the separate accounts of the company? For this purpose, "guarantees" means guarantees of principal, interest, performance indices, minimum benefits, or other arrangements where the company is

liable for an amount greater than the market value of related separate account assets. The value of any such guarantee is that amount, as of 12/31/00, deliverable to a contractholder in excess of the market value of the supporting assets. Guarantees because of death or morbidity may be excluded.

13. For this interrogatory, “illiquid assets" are defined as private placements, real estate, commercial mortgages, and any other investments that are not readily marketable. Provide a general description of all "illiquid assets" and their role within the company's asset/liability management framework. To what extent do these "illiquid assets" support liabilities with potential material cash demands as of 12/31/00? If any "illiquid assets" support liabilities with potential material cash demands as of 12/31/00, describe in detail the manner in which market values of these "illiquid assets" are determined, their marketability, and the rationale as to why "illiquid assets" are appropriate to support demand liabilities. Include an explanation of how materiality was determined.

14. Does the company have any:

    a) book value guarantees on products where the assets are held at market value (e.g., guaranteed minimum account value or income benefits on variable annuities or equity-indexed plans)? If so, list and describe such products. When do they pay out?; or
    b) agreements that guarantee a payment, other than because of death or morbidity, in excess of the liability held for any product not listed above? If so, list and describe; or
    c) other potential large* or institutional** cash demands that can trigger a material need for cash relative to the company’s capital and surplus position (e.g., agreements with rating downgrade “put” provisions or debt servicing requirements of the parent)? If so, list and describe, including an explanation of how materiality was determined.

15. What is the book and market value of public market equity (e.g., common stock and preferred stock) held in the company’s general account?

16. Describe other means of raising cash, such as lines of credit and issuing commercial paper. What restrictions, covenants, etc., limit the company’s ability to utilize these means? State the reasons why any such lines of credit are expected to be reliable, e.g., by describing the terms and conditions under which they may be canceled by the lender.

17. List the 10 largest (in terms of book value) asset holdings not publicly traded. Any such asset holdings of a given issuer should be aggregated. Include the issuer name, amount, scheduled maturity, book value, and market value.

18. List the 10 largest (in terms of withdrawal value) holders of GICs or funding agreements or similar instruments with contract-holder cash-out options. Liabilities associated with a given holder should be aggregated. Include the name of the holder, amount, and scheduled maturity. Indicate whether the contractholder can move funds at book value and under what terms and conditions.

19. List the 10 largest (in terms of withdrawal value) holders of Corporate Owned Life Insurance (COLI). Liabilities associated with a given holder should be aggregated. Include the name of the holder and amount.

20. List the 10 largest (in terms of withdrawal value) holders of Bank Owned Life Insurance (BOLI). Any liabilities associated with a given holder should be aggregated. Include the name of the holder and amount.

21. List the 10 other largest (in terms of withdrawal value) institutional** liabilities that have any book value guarantees. Liabilities associated with a given holder should be aggregated. Include the name of the holder and amount.

22. List the top 10 (in terms of withdrawal value of liabilities) agents or brokers, consultants, or other intermediaries who have potential ability to influence the withdrawal of the lesser of $50 million or 1% of company liabilities. Include their names and the amount subject to discretionary withdrawal.

23. List the 10 largest (in terms of book value) General Account Asset Holdings from RBC Worksheets. Include the issuer name, amount, scheduled maturities, book value, and market value.

24. List the 10 largest (in terms of book value) asset holdings for general account guarantees of Separate Account contracts. Asset holdings of a given issuer should be aggregated. Include the issuer name, amount, scheduled maturity, book value, and market value.

Footnotes:

* Large cash demand is defined as equal to or greater than 10% of company surplus.

** Institutional is defined as cash value products of at least $10 million, under common control or ownership, for which the decision to access the cash is in a single person/entity.

ACKNOWLEDGEMENT

I have consulted with all appropriate persons to ensure this response is complete and accurate. These persons include:

List each person separately by name and title.

To the best of my knowledge and belief, the company has the financial flexibility to adequately manage stress liquidity conditions, except as noted below:

List and describe all exceptions, including any material subsequent events after 12/31/00.

Signature of Chief Financial Officer ______________________________

Printed Name ______________________________

Title ______________________________

Address ______________________________

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Phone Number ______________________________

Facsimile Number ______________________________

Email Address ______________________________

Date ______________________________