ATTACHMENT TO CIRCULAR LETTER NO. 4 (2002)

Is the maximum possible large* or institutional** cash demand as of 6/30/2002 less than the cash and market value of United States Government Treasury Securities held by the company as of 12/31/2001?

Yes____ No____.

If Yes, Tables One and Two need not be completed. Instead, skip to the Interrogatories following Table Two.

TABLE ONE – Cash Demands (in thousands)
As of 12/31/2001

	0 to 7 days	**8 to 14 days**	**15 to 30 days**	**31 to 90 days**	**91 to 180 days**	**Over 180 days**
(A) Large* or institutional** cash demands						
(A1) Statutory liability of (A)						
(A2) Amount of (A) deferrable for 6 months						
(A3) Reinsurance receivable on amounts in (A)						
(B) Retail cash demands						
(B1) Statutory liability of (B)						
(B2) Amount of (B) deferrable for 6 months						
(B3) Reinsurance receivable on amounts in (B)						
Itemize other cash demands. 1. 2. 3. 4.						

Footnotes to Table One:

- Provide the maximum possible contractual cash demand on the company (through surrender, loan, scheduled maturity, withdrawal or other contractual options) for business in-force as of the year-end. Report demands from direct and reinsurance assumed business. Report reinsurance ceded offsets separately in A3 and B3. Report cash demands in the earliest period payable if the demand were made immediately (e.g., if $80 can be demanded now or $100 in 90 days, report the $80 in the 0 to 7 days column).

- Assume the company exercises any contractual rights with institutional customers to defer, limit, restrict or make payments in installments and report each such payment in the appropriate period.

- Exclude from Table One that portion of any business where cash demands are contractually restricted to the contractholders'/policyholders' interest in assets allocated to one or more separate accounts (e.g., non-guaranteed separate account products).

- In lines A1 and B1 provide the reduction in the statement value of liabilities resulting from meeting the cash demand. This value may differ from the cash demands due to surrender charges, withdrawal charges, market-value adjustments or statutory valuations in excess of account values. Use end of quarter market conditions where needed to determine the reduction in the statement value of liabilities, for example, to calculate a market value adjustment.

- Exclude associated changes in AVR or IMR in lines A1 and B1.

- In lines A and A1, report large* or institutional** demands before contractual deferral rights and report amounts deferrable for six months under Sections 4223(a)(1)(B) or 4221(a)(8) separately in A2.

- Retail demands include demands where the solicitation occurs at the individual or participant level. In lines B and B1, report retail demands before any contractual deferral rights and report amounts deferrable for six months under Sections 4223(a)(1)(B) or 4221(a)(8) separately in B2.

- Other itemized demands would include, but are not limited to, investment commitments, off balance sheet risk, credit guarantees and support agreements for affiliates.

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

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

TABLE TWO – Cash Resources (in thousands)
As of 12/31/2001

Investment Category	**Market Value**	**Statement Value**
Total Cash (as reported in Schedule E – Part 1)		
Investments maturing within one month*		
US Gov't Treasury Notes		
US Gov't Treasury Bonds		
Other US obligations (e.g., Agency Pass-Throughs)		
Investment grade publicly traded debt instruments		
Publicly traded non-affiliated equity investments		
Investment grade commercial mortgages		
Publicly traded investments		
Investments maturing within six months*		
Investment grade private placements		
Private placements and commercial mortgages		
Itemize other cash resources and invested assets: 1. 2. 3. 4.		

Footnotes to Table Two:

- Exclude from Table Two that portion of any cash resources that are restricted to contractholders'/policyholders' liabilities attributable to one or more separate accounts (e.g., non-guaranteed separate account products).
- Indicate the market value (e.g., FAS 115 estimates) and statement value for each cash resource at year-end. Report each cash resource only once in the first applicable category.
- Other cash resources could include but are not limited to lines of credit, support agreements from affiliates, or contractually required premiums and considerations.
- *Include known sinking fund payments and coupon income.

INTERROGATORIES

(To be answered for direct plus assumed business in the aggregate. Amounts should be provided in thousands (000 omitted), 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. Does your company have a formal written liquidity plan?
   a. If yes, provide an overview, particularly as it relates to coping with stress conditions.
   b. If not, explain why a written liquidity plan is not necessary and describe your company's liquidity policy, particularly as it relates to coping with stress conditions.

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

3. 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.
   a. 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.
   b. Based on these findings, what, if any, changes does the company plan to implement in its liquidity management process?
   c. Has there been any significant change in your company's liquidity position since the effective date of the liquidity analysis results?

4. 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.
   d. Describe and quantify all reinsurance provisions, whether assumed or ceded, that include rating downgrade "put" provisions.

5. 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.

If the maximum possible large* or institutional** cash demand as of 6/30/2002 is less than the cash and market value of United States Government Treasury Securities held by the Company as of 12/31/2001 or if the Company has a formal written liquidity plan, as described in Interrogatory No. 1, you need not complete Interrogatories 6-19. In any event please be advised that additional questions may be forthcoming after we review the information provided.

6. 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.

7. What is the total liquidity exposure, as of 12/31/2001, 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 12/31/2001, deliverable to a contractholder in excess of the market value of the supporting assets. Guarantees because of death or morbidity may be excluded.

8. 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 12/31/2001? If any "illiquid assets" support liabilities with potential material cash demands as of 12/31/2001, 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.

9. 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.

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

11. 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.

12. 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.

13. 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.

14. 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.

15. 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.

16. 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.

17. 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.

18. 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.

19. 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 12/31/2001.

The Department will be promptly notified if the Company's ability to manage stress liquidity risk becomes compromised.

Signature of Chief Financial Officer	______________________________
or Highest-Ranking Financial Officer	______________________________
Printed Name	______________________________
Title	______________________________
Address	______________________________
	______________________________
Phone Number	______________________________
Facsimile Number	______________________________
Email Address	______________________________
Date	______________________________