December 31, 1982

SUBJECT: INSURANCE

WITHDRAWN

Circular Letter No. 33 (1982)
December 31, 1982

TO: ALL AUTHORIZED LIFE INSURANCE COMPANIES AND FRATERNAL BENEFIT SOCIETIES

ATTN: Chief Actuary or Consulting Actuary

SUBJECT: A Definition of "Qualified Actuary" and Guidelines Concerning Requirements for an Actuarial Opinion and Memorandum for Certain Reserves for Guaranteed Interest and Similar Contracts Under Section 205

Section 205 [Paragraph 3(b-1)(B)(vi)] as enacted in Chapter 122 of the Laws of 1982, states the situations under which an actuarial opinion and its supporting memorandum must be submitted by a qualified actuary. Since this represents a relatively new area of actuarial responsibility, the purpose of this letter is to provide a definition of a "qualified actuary" and some guidelines concerning the submission of an actuarial opinion and supporting memorandum in accordance with the statute for the reserve valuation of the specified annuities, benefits and contracts as of December 31, 1982. It is anticipated that the definition of a qualified actuary and the guidelines will become more precise and/or more complete as further knowledge and experience is developed in this area of reserve valuation.

The current definition of a "qualified actuary" for the purpose of signing the actuarial opinion concerning these reserves is presented in enclosed Exhibit 1. It should be emphasized that such an individual may continue to be considered as a "qualified actuary" only through continued satisfactory professional performance in this area, as specified in item 3 of the listed requirements.

The current set of guidelines concerning the actuarial opinion and actuarial memorandum is enclosed in Exhibit 2. They are intended to illustrate some considerations, methodology and approaches which will probably provide a "safe harbor", as acceptable for the December 31, 1982 valuation of these policies and contracts. Alternate approaches, formats, etc. to the guidelines may also be acceptable, provided that the qualified actuary is able to demonstrate to the satisfaction of the Superintendent that they provide, a sound actuarial basis for the actuarial opinion and memorandum.

Exhibit 3 herewith outlines the updated valuation factors (<i>my), for the 1982 year-end and later valuations, with respect to contributions received in 1981. The previous factors were given in an attachment to Circular Letter No. 26 (1981), dated December 11, 1981.

If you have any questions concerning the definition of a "qualified actuary" or the illustrative guidelines, kindly contact Chief Life Actuary Thomas J. Kelly at the letterhead address or by telephone, Area Code (212) 488-2148 or contact Robert Callahan at the address below or by telephone, Area Code (518) 474-7929.

Kindly acknowledge receipt of this letter and submit actuarial opinions and memorandums to:

Mr. Robert J. Callahan, Chief

Actuarial Valuation Bureau
New York Insurance Department
Empire State Plaza
Agency Building One
Albany, NY 12257

Very truly yours,

[SIGNATURE]

ALBERT B. LEWIS

Superintendent of Insurance

Enc.

EXHIBIT 1

QUALIFICATION OF ACTUARIES*

*These qualifications shall also apply with respect to the actuary who signs the certification, relating to 1982 and later year-end valuations, called for in Circular Letter 26 (1981) dated December 11, 1981, for contributions received in 1980 and 1981.

Section 205.3 (b-l)(B)(vi) of the Insurance Law states in part:

"For purposes hereof, "qualified actuary" shall mean any individual who is a member of the American Academy of Actuaries and satisfies the qualification standards set by the Superintendent for practice in the valuation of life insurance company annual statement liabilities,
or,
who is designated a qualified actuary by the Superintendent after written application to the Superintendent providing evidence of such individual's actuarial knowledge and experience in the valuation of such liabilities."

The above format with "or" on a separate line has been used here so as to make it clear that what we refer to as the primary route comes before the "or" and the secondary route after the "or".

A. Primary Route:

A "qualified" actuary shall mean an individual who satisfies all the following requirements:

1. Is a member of the American Academy of Actuaries and is qualified to sign a life insurance company annual statement in accordance with the American Academy of Actuaries qualification standards for actuaries signing such statements.

2. Is a Fellow of the Society of Actuaries or demonstrates actuarial competence through a different approach, such as, fellowship in another actuarial body which has similar examinations and professional standards relating to actuarial expertise in life insurance and annuities.

3. Has not been found by the Superintendent, following appropriate notice and hearing, that the individual:

(a) Has violated any provision of, or any obligation imposed by, the insurance law, or has violated any law in the course of his dealings as a "qualified actuary"; or,

(b) has been found guilty of fraudulent or dishonest practices; or

(c) has demonstrated his incompetency or untrustworthiness to act as a "qualified actuary".

B. Secondary Route

1. A "qualified actuary" shall mean an individual who is so designated by the Superintendent after written application to the Superintendent providing evidence of such individual's actuarial knowledge and experience in the valuation of life insurance company annual statement liabilities. Such knowledge shall include knowledge of the material cited in the American Academy of Actuaries qualification standards for actuaries signing life insurance company annual statements.

2. Same as item 3 under Primary Route.

EXHIBIT 2

GUIDELINES TO ASSIST ACTUARIES IN COMPLYING WITH THE SPECIAL REQUIREMENTS FOR AN ACTUARIAL OPINION AND MEMORANDUM FOR USE OF THE HIGHER INTEREST RATES TO VALUE ANNUITIES AND GUARANTEED INTEREST CONTRACTS UNDER NEW YORK LAW*

*These guidelines also apply to the substance of the certification called for in Circular Letter 26 (1981), with respect to 1982 and later year-end valuations of contributions received in 1980 and 1981.

1. These guidelines are designed to assist the actuary in preparing the statement of actuarial opinion and accompanying memorandum described in the New York Standard Valuation Law (Section 205) as special requirements for the use of higher interest rates for the valuation of annuities and guaranteed interest contracts.

2. Section 205 (Paragraph 3 (b-1) (B) (vi)) states that whenever the more liberal interest rates provided in that section are used in the valuation of annuities and guaranteed interest contracts, "the company shall submit to the superintendent with each annual report reflecting the valuation of such annuities, benefits or contracts based on such formula an opinion, in form satisfactory to the superintendent, of a qualified actuary that the reserves for such annuities, benefits or contracts, and the assets held by the company in support of such reserves, make good and sufficient provision for the liabilities of the company with respect thereto, such opinion to be accompanied by a memorandum also in form satisfactory to the superintendent, of the qualified actuary describing the calculations made in support of such opinion and the assumptions used in the calculations."

Some insight into the nature of this special requirement may be found in an earlier New York Insurance Department document applicable to group annuity guaranteed interest contracts (Circular Letter No. 26 (1981)), which calls on the actuary to certify "that he or she has performed satisfactory tests to demonstrate that there is a reasonable matching of assets and liabilities relative to such... contracts. Such tests should include demonstrations that the expected cash flows, including scheduled investment earnings and maturities of the invested assets, is adequate to provide for the guarantees under the contracts and that there is appropriate protection against loss to the company in case of (1) premature repayments of loans or investments (in case of falling interest rates) and (2) premature withdrawals by the policyholder (in case of rising interest rates)."

3. The statement of actuarial opinion described in Section 205 should conform to the standards applicable to all statements of actuarial opinion for life insurance company statutory annual statements as set forth in the American Academy of Actuaries Recommendation 7 and Interpretations 7-A, 7-B, and 7-C.

The statement of actuarial opinion should include: (a) an identification paragraph; (b) a scope paragraph; and, (c) an opinion paragraph.

(a) The identification paragraph should identify the actuary and generally indicate the actuary's relationship to the company.

> A company actuary might use a form such as:
>
> "I, (name and title of actuary) am an officer (employee) of the XYZ Life Insurance Company (company) and a member of the American Academy of Actuaries."
>
> A consulting actuary might use a form such as:
>
> "I, (name and title of actuary), am associated with the firm of A & B, Consulting Actuaries, and am a member of the American Academy of Actuaries. I have been retained by the XYZ Life Insurance Company (company)."

(b) The scope paragraph should indicate that the actuary has examined the basic data using a form such as:

> "I have examined the policy and contract reserves, listed below, as held in the annual statement of the company, and as prepared for filing with state regulatory officials, as of December 31, 19__. This included an examination of the basic in force data and actuarial assumptions and procedure used in determining such reserves and the provisions of the policies and contracts relevant to the determinations."
>
> "I have also examined data representing the assets held by the company in support of these reserves. This included an examination of the basic in force data and the basis of valuation of such assets and the incidence and amounts of scheduled investment earnings and maturities of such assets."

The scope paragraph should also list those reserves with respect to which the actuary is expressing an opinion. The list should include any annuities or guaranteed interest contracts for which the interest rates used in determining the minimum valuation standard were based on the formula stated in subparagraph (ii) of Section 205 (b-1) (B) of New York Law.

For example,

> "Reserve for Immediate Annuities................$___________
>
> Reserve for Other Annuities.....................$___________
>
> Reserve for Guaranteed Interest Contracts.......$___________
>
> Total Reserve Covered by this Opinion...........$___________

Finally, the scope paragraph should contain a general description of the actuarial tests and calculations made in support of the union. These descriptions may vary considerably from one opinion to another since each actuary should perform the tests that he/she considers necessary to support his/her opinion. The description may be more general than one typically found in an actuarial report since a memorandum describing the calculations must also be attached. A reference to the memorandum should be included in the opinion.

An actuary might use a form such as:

> "My examination included such actuarial tests and calculations as I considered necessary to determine whether the assets held by the company in support of the reserves listed above, make good and sufficent provision for the contractual obligations of the company that are represented by such reserves. These tests included consideration of the provisions of the policies and contracts in force on the valuation date, including any reinsurance agreements pertaining to such policies and contracts, and of the characteristics of the supporting assets affecting future cash flows. The tests were conducted under various assumptions as to future interest rates, and particular attention was given to those provisions and characteristics that might cause future cash flows to vary with changes in the level of prevailing interest rates. A description of the procedures, assumptions and data used in these tests, and a numerical summary of the major findings, are set forth in a memorandum attached to this opinion. Details of the calculations and related documents are available for examination by the New York Insurance Department."

In the event that the supporting memorandum referred to in the preceding paragraph was prepared by an actuary other than the actuary signing the statement of actuarial opinion, this should be clearly stated in the scope paragraph with a clear indication of the reliance being placed by the latter on the actuary who prepared the supporting memorandum.

(c) The opinion paragraph may consist of a single sentence:

> "In my opinion the assets held by the company in support of the policy and contract reserves identified above make good and sufficient provision for the contractual obligations of the company under such policies and contracts."

However, the actuary may conclude that a more detailed opinion is needed or otherwise appropriate, in, which case this paragraph should be expanded.

4. The accompanying memorandum required by Section 205 describing the calculations made in support of the actuarial opinion and the assumptions used in the calculations should include at least the following:

(a) a description of the reserves being tested in the calculations, including

(i) the contractual obligations under the policies and contracts represented by such reserves and the source of the in force data representing the contractual obligations on the valuation date,

(ii) the valuation bases of the reserves being tested with specific references to use of any aggregate tests to comply with statutory reserve requirements,

(iii) the assets held by the company in support of such reserves and the source of the in force data representing the assets on the valuation date;

(b) description of the methods used to project future cash flows under the policies and contracts represented by the reserves being tested in the calculations, including

(i) methods used to project future insurance cash flows (i.e., future considerations less contractual payments) from the policies and contracts in force on the valuation date under the various paths of future interest rates being tested, adjusted for expenses and taxes where applicable,

(ii) methods used to project future investment cash flows (i.e., future investment income, principal repayments and realized capital gains/losses) from the assets held by the company in support of the reserves under the various paths of future interest rates being tested, adjusted for expenses and taxes where applicable. Future investment cash flows are both from assets owned by the company on the valuation date and from assets acquired after the valuation date, from net positive insurance and investment cash flows, adjusted for any borrowing or sale of assets after the valuation date to cover any net negative insurance and investment cash flows. The method used by the company to allocate investment income to its lines of business on the annual statement and for purposes of this testing should be indicated.

(c) description of the paths of future interest rates tested in the calculations;

(d) description of the method used to combine the projected insurance and investment cash flows and relate them to a common date of reference under the various paths of future interest rates being tested,

(e) numerical summary of results of the calculations;

(f) description of how the actuary has drawn on the results of the calculations in forming an opinion that the assets held by the company in support of the policy and contract reserves make a good and sufficient provision for the contractual obligations of the company under such policies and contracts.

5. Details to be considered for various items included in the accompanying memorandum:

(a) Considerations relating to description of reserves being tested.

In examining the contractual obligations under the policies and contracts represented by the reserves being tested, the actuary will need to review and describe the source of the in force data on the valuation date. This may take the form of an actual inventory of the in force on the valuation date, a projection of the in force from an earlier inventory, or another approach. Whichever approach is taken should be described in the memorandum.

The tests should include all policies and contracts in force on the valuation date, but not policies and contracts sold or entered into after the valuation date. If a binding commitment has been made to enter into a policy or contract on the valuation date with an effective date after the valuation date, or if the policy or contract is already in effect but no actual considerations have been received as of the valuation date, the inclusion or exclusion of such commitment should be disclosed in the memorandum.

The actuary should review the policy and contract provisions under the policies and contracts represented by the reserves being tested, identifying the provisions that can materially affect future insurance cash flows (i.e., future consideration less contractual payments) from contractual obligations, and describing such provisions, including any provisions for early withdrawal of all or part of the cash value, in the memorandum.

The reserves being tested in the calculations may be the reserves actually held in the company's annual statement for each major grouping of contractual obligations, or they may differ from their respective annual statement amounts, particularly if the company made use of an aggregate test to comply with statutory reserve requirements. If there are such difference, details of the valuation bases of the reserves being tested should be included in the memorandum and it should be clear that all reserves that entered into the aggregate test and all the contractual obligations represented by such reserves are included in this actuarial opinion.

In examining the assets held by the company in support of the reserves being tested, the actuary will need to review and describe the source of the in force data on the valuation date. In defining the in force, commitments on the valuation date for the future acquisition of investments may or may not be included. Inclusion or exclusion of such commitments should be consistent with the definition of in force for the contractual obligations on the valuation date and should be disclosed in the memorandum.

The actuary should determine which of the company's assets on the valuation date are deemed to support the reserves being tested, both with respect to (i) the dollar annual statement value of the assets on the valuation date and (ii) the expected incidence and amounts of investment earnings and principal repayments of such assets:

> (i) At least initially, the dollar annual statement value of the assets deemed to support the reserves being tested may be set equal to the dollar amount of such reserves on the valuation date. If such dollar value of assets is greater than the amount of the reserves being tested, or if the tests show that an additional dollar value of assets is needed to support the tested reserves, then the memorandum should discuss the sufficiency of the remaining assets to support the remaining liabilities and the surplus.
>
> (ii) There are probably several approaches from which a choice can be made to determine the expected incidence and amounts of investment earnings and principal repayments. The approach used and its implications should be clearly described in the memorandum. In selecting the approach, care should be taken to assure that the earnings potential and maturity structure of assets left to support reserves not included in the tests are adequate.
>
> One approach might be to identify the assets which were selected with cash flow provisions which were designed, as closely as feasible, to match the cash flow provisions of the policies and contracts whose reserves are being tested.
>
> Another approach might be to examine a segment of the company's total assets contructed by an allocation method consistent with the basis used for allocating the company's investment income among annual statement lines of business, adjusted as needed to secure the proper dollar statement value of assets established in (i) above.

(b) Considerations relating to methods used to project future cash flows.

In testing the reserves, the actuary will need to project future cash flows from the policies and contracts represented by such reserves under various paths of future interest rates --both insurance cash flows from the contractural obligations under the policies and contracts, and investment cash flows from the assets held by the company in support of the reserves.

In projecting insurance cash flows, the actuary should pay particular attention to those contractual provisions that can affect future cash flows, such as:

for guaranteed interest contracts,

> (i) the duration of the interest rate guarantee and the levels of interest rates guaranteed,
>
> (ii) whether future considerations are permitted under the interest rate guarantee and any limitation on the amounts and incidence of such considerations,
>
> (iii) whether the policyholder is permitted to withdraw funds before the date of expiry of the interest rate guarantee and at what terms (e.g., surrender charge or market value adjustment, if any),

(iv) whether individual participants under a group policy or contract are permitted to withdraw or transfer funds before the date of expiry of the interest rate guarantee, and with what restrictions, if any,

(v) any rights to renegotiate the terms of the interest rate guarantee before the date of expiry of the guarantee,

(vi) expenses and taxes as applicable,

for annuities,

(i) the amounts and incidence of the guaranteed benefit payments,

(ii) any death benefits or survivor income benefits associated with the annuities,

(iii) any rights to commute the value of the benefit payments (for example, deferred cash surrender benefits) or otherwise modify the amounts and incidence of the payments,

(iv) expenses and taxes as applicable;

Each of the above should be examined to determine the extent to which future insurance cash flows may vary due to changes in the prevailing interest rates. For example, as interest rates rise, future considerations under a fixed interest rate guarantee may be expected to decline and future withdrawals may be expected to rise; as interest rates fall, considerations may rise and withdrawals decline. The specific assumptions used in the projections for future considerations and future withdrawals, including the extent to which these assumptions vary with future interest rates, should be covered in the memorandum.

In projecting investment cash flows, the actuary should pay particular attention to those characteristics of the invested assets that can effect future cash flows, such as:

(i) the types of investment and whether future investment cash flows are fixed or variable (e.g., due to equity features in the investment),

(ii) the amounts and incidence of scheduled (or expected) investment earnings,

(iii) the amounts and incidence of scheduled repayments of principal,

(iv) early repayment provision (e.g., call provisions),

(v) the expected marketability of the investments (e.g., private bonds and mortgages vs public issues),

(vi) expenses, taxes and MSVR effects as applicable.

Each of the above should be examined to determine the extent to which future investment cash flows may vary due to changes in the prevailing interest rates. For example, as interest rates fall, non-scheduled repayments of principal may be expected to rise; as interest rates rise, such repayments may decline. The specific assumptions used in the projections for future investment earnings and future repayments of principal, including the extent to which these assumptions vary with future interest rates, should be covered in the memorandum.

The projections of investment cash flows should include investment earnings and repayments of principal not only from the invested assets held by the company on the valuation date, but also from assets to be acquired after the valuation date. This requires an explicit assumption in the projections as to how any future net positive cash flows will be invested, with particular emphasis on the durations of such investments and the extent to which the durations of future investments may vary with prevailing interest rates at the time of acquisition. Similar assumptions are also required for interest rates and durations of borrowed money, which again will vary with the prevailing interest rates at the time of borrowing, if borrowed funds are needed to cover, future negative cash flows at any time during the projection period. All assumptions concerning such reinvestment of net positive cash flows should be covered in the memorandum.

While the actuary is expected to examine the scheduled investment earnings and repayments of principal from the assets supporting the reserves, and the extent to which these cash flows may vary with changes in future interest rates, it is not expected that the actuary will be called upon to express an opinion with regard to the underlying quality of the assets and with regard to the risk of asset default as to interest and/or principal. In this regard, it is expected that the actuary can rely on the company's valuation of assets in accordance with NAIC asset valuation bases and procedures. The actuary may wish to include provision for an asset valuation reserve in the investment cash flow projections and, if so, this should be stated in the memorandum.

The actuary may deem it appropriate to recognize various expenses and taxes in projections both of insurance cash flows and investment cash flows. If so, the treatment of expenses and taxes should be consistent throughout and described in the memorandum.

(c) Considerations relating to future interest rates used in tests.

Perhaps the most important assumptions in the projections of insurance and investment cash flows are the various paths of future interest rates being tested. Testing on a single path of future interest rates, even if that path is deemed most likely by the actuary, is not enough. Several different paths need to be tested in the calculations.

The paths of interest rates used in the tests should extend far enough into the future to provide for the major portion of the future runout of insurance cash flows from the contractual obligations on the valuation date as well as future investment cash flows from assets held on the valuation date. Paths to be tested should include at least one with future interest rates higher than that prevailing on the valuation date, and at least one with lower future interest rates. A level path of future interest rates may also be useful as a reference. The actuary should indicate the number of paths selected and the range of interest rates.

Tests should cover as many alternative interest rate paths as the actuary deems necessary to generate an understanding of the dynamics relating the insurance and investment cash flows. The range of paths tested should be broad enough to enable the actuary to form an opinion that the reserves do make a good and sufficient provision for the contractual obligations under the policies and contracts.

(d) Considerations relating to methodology for evaluating cash flows.

The memorandum should include a description of the method used to project insurance and investment cash flows under the various paths of future interest rates and to relate the result to a common date of reference. Grouping approximations, modeling and other acceptable actuarial techniques may be employed.

The insurance and investment cash flows could be added together (or netted) for each future year or other unit of time in the projections and the results accumulated forward or discounted backward to a common date of reference, or the insurance and investment cash flow streams may be accumulated or discounted separately, and then combined on the common date of reference.

The method of accumulating or discounting the cash flow streams needs to be consistent with the future investment strategy used in the projections themselves and not simply an accumulation or discounting of net cash flows at a single rate of interest.

One possible approach would be to project the total cash flow, including insurance and investment cash flows, with reinvestment of net positive cash flows during the projection period and borrowing or selling assets to cover net negatives, to the date of the last payment under the contractual obligations, and then determine a "market value" or any remaining assets or net borrowed funds on that date.

Such market value would be based on the assumption that interest rates after such date would be frozen at the prevailing rate on that date which, though not necessarily a valid assumption, should not materially impact on the overall calculations. If the "market value" of remaining assets on such date is positive or zero, the reserves on the valuation date would be deemed sufficient for the contractual obligations on that interest rate path; if negative, the reserves would be deemed not sufficient on that path..

It must be emphasized that there are a number of other approaches which may serve equally well. Whichever approach is followed should be described in the memorandum.

(e) Considerations relating to numerical results presented in the memorandum.

The memorandum should include a tabular display of numerical results of the calculations. This should include at least the dollar amounts of reserves being tested broken down by major type of business. For each major type of business covered in the tests, the display should give a single value which combines insurance and investment cash flows accumulated or discounted to a common reference date for each of several paths of interest rates being tested, with a clear indication of what the common reference date is in each case. The actuary should be prepared to provide separate results for each interest rate path, if requested.

(f) Considerations relating to description in the memorandum of conclusions drawn from the calculations.

The memorandum should include a summary of how the tests described in the memorandum and the numerical results of the tests presented in the memorandum led the author of the memorandum to conclude that the assets supporting the policy and contract reserves being tested are sufficient to provide for the contractual obligations under such policies and contracts.

6. COMMENTS RELATING TO THE ACTUARY'S CONCLUSION

An actuary stating an actuarial opinion that the assets held by the company in support of certain policy and. contract reserves make good and sufficient provision for the contractual obligations of the company under such policies and contracts is expressing a personal opinion for which the actuary takes full responsibility. The actuary stating the opinion will ordinarily make use of other personnel to carry out assignments relative to the matters which the opinion covers and may, as stated in paragraph 3 above, rely on another actuary to perform the calculation and prepare the supporting memorandum described in paragraphs 4 and 5. Even in this latter case, however, the actuary stating the opinion is responsible for the opinion and cannot rely on the actuary who signs the memorandum for the opinion itself.

In forming such an opinion, the actuary should evaluate the actuarial assumptions used by comparison with plausible sets of adverse circumstances, including plausible paths of future interest rates, and in relation to the time periods over which such circumstances can plausibly be expected to prevail. The adequacy of the reserves established and the advancing of an opinion by the actuary that said reserves do indeed make good and sufficient provision for the unmatured obligations being reviewed requires that the tests be performed in accordance with commonly accepted actuarial standards and sound actuarial principles. To hold reserves so great that a company could withstand any conceivable circumstance, no matter how adverse, including paths of future interest rates with wide swings, that while certainly possible, can be considered unlikely or not very plausible, would imply an excessive level of pricing of the insurance product, and good actuarial practice does not encompass such a degree of conservatism.

"Commonly accepted actuarial standards" and "sound actuarial principles" emerge from the use and adaptation of concepts described in actuarial literature. Such literature relating to the special New York requirement includes the Recommendations and Interpretations of the American Academy of Actuaries; the professional journals of the Society of Actuaries; recognized actuarial textbooks; and, regulations of the National Association of Insurance Commissioners and of State Insurance Departments. The Study Notes for candidates for membership in the Society of Actuaries are also valuable parts of the literature, but it should be kept in mind that the Study Notes are intended primarily to teach basic principles rather than to specify operating instructions.

EXHIBIT 3

Up-dating of Valuation Factors (<i>[my]), Given in Attachment to Circular Letter No. 26 (1981), Dated December 11, 1981

	Calendar Year y in Which Contributions Were Received	Value of <i>[my] for Calendar Years y+1 Through y+10	
		Type (a) Contracts	Type (b) Contracts
Given in Circular Letter No. 26 (1981)	1981	.107	.102
	1981*	.124	.119
Up-dated Factors, for 1982 and later valuations	1981	.109	.104
	1981*	.128	.123

*These values of <i>[my] are applicable only for a company that meets the conditions regarding actuarial certification of a reasonable matching of assets and liabilities.