

A LIST OF SPECIFIED FORMS

SECT	COMPANY NAME	FORM NUMBER	FILING ID	FILING TYPE	COMPLETE DATE	COMPLETE STATUS	CU	ST	DES1	DES2	DES3	DES4	DES5	RL YR	RL NO.	RL FILE	POST FRAME	I
CI	AMERICAN BANKERS LIF	RATES/AC3818CB-0298	2506204-0	A	02-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	AMERICAN GENERAL ASS	RATES	2504241-0	A	05-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	AMERICAN HEALTH AND	RATES (70930 (3.50& 2506496-0		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (70931 (3.50& 2506496-1		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (72790 (3.50& 2506496-10		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (72791 (3.50& 2506496-11		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (72792 (3.50& 2506496-12		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (72793 (3.50& 2506496-13		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (72794 (3.50& 2506496-14		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (72795 (3.50& 2506496-15		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (72796 (3.50& 2506496-16		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (72797 (3.50& 2506496-17		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (72798 (3.50& 2506496-18		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (72799 (3.50& 2506496-19		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (70932 (3.50& 2506496-2		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (72800 (3.50& 2506496-20		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (72801 (3.50& 2506496-21		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (70933 (3.50& 2506496-3		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (71033 (3.50& 2506496-4		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (71034 (3.50& 2506496-5		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (71035 (3.50& 2506496-6		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (71036 (3.50& 2506496-7		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (71037 (3.50& 2506496-8		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (72789 (3.50& 2506496-9		A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	AMERICAN HERITAGE LI	RATES (M-2136-TX 2505721-0		A	13-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (M-2290-TX 2505721-1		A	13-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (M-2291-TX 2505721-2		A	13-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	AMERICAN NATIONAL IN	RATES (DEVIATION CR 2502894-0		A	05-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	AMERICAN UNITED LIFE	RATES (G-135(44)A 3 2506704-0		A	26-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (G-135.4(44)A 2506704-1		A	26-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (G-142(44)C (2506704-2		A	26-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (GC-135(44)B 2506704-3		A	26-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	AUTOMATED FINANCIAL	RATES (AFIC-2CL TX 2506694-0		A	24-SEP-2001	AP	AP	AP	RATE	GCL	DEVN	2159						Y
CI	BALBOA LIFE INSURANC	RATES (9P432R0193 (2511440-0		A	21-DEC-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (9R219R0193 2511440-1		A	21-DEC-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (9CX548R0193 2511440-2		A	21-DEC-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	BALTIMORE LIFE INSUR	RATES (4942MGP(TX) (2506354-0		A	13-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (4941A(TX) (2506354-1		A	13-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (4940C(TX) (2506354-2		A	13-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (4938A(TX) (2506354-3		A	13-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (4939C(TX) (2506354-4		A	13-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y

A LIST OF SPECIFIED FORMS

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CI	CENTRAL STATES HEALTH	ALL C.C. ACCOUNTS -	2500749-0	A	19-JUN-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (304251 2ND R	2507730-1	A	08-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (304701 TX (3	2507730-0	A	08-OCT-2001	AP	IF	RATE	GCLA	DEVN	2159							Y
CI	CENTURY LIFE ASSURAN	RATES(CMC CLAC CERT	2506382-0	A	19-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	CONSOLIDATED GENERAL	ANNUAL REVIEW (WASH	2506146-0	A	16-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (1259 03/02 (2517454-0	A	04-FEB-2002	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (1260 03/02 (2517454-1	A	04-FEB-2002	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	CUNA MUTUAL INSURANC	POOL (CREDIT UNIONS	2503912-0	D	02-OCT-2001	RV	RV	RATE	GCLA	DEVN								Y
CI	ENTERPRISE LIFE INSU	RATES(GELTX(3/94)RE	2505321-0	A	20-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	FINANCIAL AMERICAN I	RATES (P-42 IP-100	2506707-0	A	03-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (APP-42 IP-10	2506707-1	A	03-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	J.M.I.C. LIFE INSURA	RATES (TXE-LEV (10/	2502895-0	A	17-SEP-2001	AP	AP	AP	RATE	CLA	DEVN	2159						Y
CI		RATES (TXE-DEC (10/	2502895-1	A	17-SEP-2001	AP	AP	AP	RATE	CLA	DEVN	2159						Y
CI		RATES (TXE-DIS (10/	2502895-2	A	17-SEP-2001	AP	AP	AP	RATE	CLA	DEVN	2159						Y
CI	LIFE INVESTORS INSUR	RATES (LP-1141 RCX	2506134-0	A	09-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (LP-1144 LP (2506134-1	A	09-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (LP-1267 JLSJ	2506134-10	A	09-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (LP-1295.TX (2506134-11	A	09-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (LP-1296.TX (2506134-12	A	09-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (LP-1294.TX (2506134-13	A	09-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (AP-1163 JLSJ	2506134-14	A	09-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (AP-1510 JL S	2506134-15	A	09-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (LP-1150 JIRC	2506134-2	A	09-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (LP-1134 JLSJ	2506134-3	A	09-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (LP-1135 SPX	2506134-4	A	09-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (LP-1128 (3.5	2506134-5	A	09-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (LP-1132 (3.5	2506134-6	A	09-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (LP-1162 RC (2506134-7	A	09-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (LP-1215 RCX	2506134-8	A	09-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (LP-1269 (3.5	2506134-9	A	09-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	LIFE PROTECTION INSU	RATES (1259 03/02 (2515481-0	A	24-JAN-2002	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (1260 03/02 (2515481-1	A	24-JAN-2002	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	MADISON NATIONAL LIF	KEYSTONE CREDIT UNIT	2495639-0	A	10-MAY-2001	AP	AP	AP	RATE	GCAH	DEVN							N
CI		S.P. TRAINMEN FCU	2522730-0	A	27-MAR-2002	AP	AP	AP	RATE	GCAH	DEVN							N
CI		PUBLIC EMPLOYEES CR	2489108-0	A	12-JAN-2001	AP	AP	AP	RATE	DEVN								Y
CI		CITY EMPLOYEES CRE	2489216-0	A	16-JAN-2001	AP	AP	AP	RATE	GCAH	DEVN							Y
CI		SPO FEDERAL CREDIT	2490063-0	A	20-MAR-2001	AP	AP	AP	RATE	GCAH	DEVN							Y
CI		MET TRAN FEDERAL CR	2493768-0	A	24-APR-2001	AP	AP	AP	RATE	GCAH	DEVN							Y
CI		SHERWIN FEDERAL CRE	2497312-0	A	15-MAY-2001	AP	AP	AP	RATE	DEVN								Y

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CI MADISON NATIONAL LIFE	PATELCO CREDIT UNTO	2497470-0	A	17-MAY-2001	AP	AP RATE	GCAH	DEVN									Y
CI	ANNUAL REVIEW - BA	2500221-0	A	03-JUL-2001	AP	AP RATE	GCAH	DEVN									Y
CI	TEXAS & PACIFIC EMP	2504588-0	A	22-AUG-2001	AP	AP RATE	GCAH	DEVN									Y
CI	TEXAS STEEL EMPLOYE	2506022-0	A	13-SEP-2001	AP	AP RATE	GCAH	DEVN									Y
CI	RATE(4402 CI REV.4/	2503933-0	A	10-OCT-2001	AP	AP RATE	CLA	DEVN									Y
CI	RATES (4407 MOB (3,	2503933-1	A	10-OCT-2001	AP	AP RATE	GCLA	DEVN									Y
CI	RATE(4402 CI REV.4/	2503937-0	A	10-OCT-2001	AP	AP RATE	GCLA	DEVN									Y
CI	RATE(4407 MOB (3.53	2503937-1	A	10-OCT-2001	AP	AP RATE	GCLA	DEVN									Y
CI	PUBLIC EMPLOYEES CU	2511892-0	A	21-DEC-2001	AP	AP RATE	GCAH	DEVN									Y
CI	SANTA FE CREDIT UNI	2516347-0	A	24-JAN-2002	AP	AP RATE	GCLA	DEVN									Y
CI	ANNUAL REVIEW (FIRS	2489028-0	D	16-JAN-2001	AP	AP RATE		DEVN									Y
CI	ANNUAL REVIEW (UPCW	2489029-0	D	16-JAN-2001	AP	AP RATE		DEVN									Y
CI	SANTA FE FCU	2493705-0	D	24-APR-2001	RV	RV RATE	GCAH	DEVN									Y
CI	MAGNA INSURANCE COMP	RATES (06CRI00-TX (A	07-SEP-2001	AP	AP RATE	GCLA	DEVN									Y
CI	MCDONALD LIFE INSURA	RATES (MCD-003-REV(A	06-DEC-2001	AP	AP RATE	GCAH	DEVN									Y
CI	MERIT LIFE INSURANCE	RATES (ML3-285-TX (A	14-SEP-2001	AP	AP RATE	GCLA	DEVN									Y
CI	RATES (ML3-285A-TX	2506462-1	A	14-SEP-2001	AP	AP RATE	GCLA	DEVN									Y
CI	RATES (ML3-285DX-TX	2506462-2	A	14-SEP-2001	AP	AP RATE	GCLA	DEVN									Y
CI	RATES (ML3-285CX-TX	2506462-3	A	14-SEP-2001	AP	AP RATE	GCLA	DEVN									Y
CI	RATES (ML3-285NPI-T	2506462-4	A	14-SEP-2001	AP	AP RATE	GCLA	DEVN									Y
CI	RATES (ML3-627-TX(3	2507993-0	A	15-OCT-2001	AP	AP RATE	GCAH	DEVN									Y
CI	RATES (ML3-627D-TX(2507993-1	A	15-OCT-2001	AP	AP RATE	GCAH	DEVN									Y
CI	MINNESOTA LIFE INSUR	BEAUMONT TELCO FCU	A	11-MAY-2001	AP	AP RATE	GCAH	DEVN									Y
CI	DALLAS TELCO FCU (2495987-12	A	11-MAY-2001	AP	AP RATE	GCAH	DEVN									Y
CI	HOUSTON CHRONICLE E	2495987-13	A	11-MAY-2001	AP	AP RATE	GCAH	DEVN									Y
CI	UNITED HERITAGE CU	2495987-14	A	11-MAY-2001	AP	AP RATE	GCAH	DEVN									Y
CI	DALLAS TEACHERS CU	2495987-15	A	11-MAY-2001	AP	AP RATE	GCAH	DEVN									Y
CI	COMMUNITY CU (NON	2495987-2	A	11-MAY-2001	AP	AP RATE	GCAH	DEVN									Y
CI	AMARILLO COMMUNITY	2495987-6	A	11-MAY-2001	AP	AP RATE	GCAH	DEVN									Y
CI	HOUSTON POLICE FCU	2495987-7	A	11-MAY-2001	AP	AP RATE	GCAH	DEVN									Y
CI	UNION SQUARE FCU (C	2495987-8	A	11-MAY-2001	AP	AP RATE	GCAH	DEVN									Y
CI	NON CREDITABLE LIFE	P 2495987-0	A	11-MAY-2001	AP	AP RATE	GCL	DEVN									Y
CI	BEAUMONT TELCO FCU	2495987-1	A	11-MAY-2001	AP	AP RATE	GCL	DEVN									Y
CI	COMMUNITY CU (NON C	2495987-10	A	11-MAY-2001	AP	AP RATE	GCL	DEVN									Y
CI	HOUSTON POLICE FCU	2495987-16	A	11-MAY-2001	AP	AP RATE	GCL	DEVN									Y
CI	UNION SQUARE CU (CR	2495987-17	A	11-MAY-2001	AP	AP RATE	GCL	DEVN									Y
CI	AMARILLO COMMUNITY	2495987-18	A	11-MAY-2001	AP	AP RATE	GCL	DEVN									Y
CI	DALLAS TELCO FCU	2495987-3	A	11-MAY-2001	AP	AP RATE	GCL	DEVN									Y
CI	HOUSTON CHRONICLE E	2495987-4	A	11-MAY-2001	AP	AP RATE	GCL	DEVN									Y
CI	UNITED HERITAGE CU	2495987-5	A	11-MAY-2001	AP	AP RATE	GCL	DEVN									Y
CI	DALLAS TEACHERS CU	2495987-9	A	11-MAY-2001	AP	AP RATE	GCL	DEVN									Y
CI	MONUMENTAL LIFE INSU	RATES (37-1013 (3.5	A	18-OCT-2001	AP	AP RATE	GCLA	DEVN									Y
CI	RATES (87-1176 ML-5	2506138-1	A	18-OCT-2001	AP	AP RATE	GCLA	DEVN									Y
CI	RATES (87-1177 ML-5	2506138-2	A	18-OCT-2001	AP	AP RATE	GCLA	DEVN									Y

< CODDGS > RUN DATE: APRIL 8TH, 2002 1:43:25 PM

A LIST OF SPECIFIED FORMS

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CI	MONUMENTAL LIFE INSU	RATES (37-1388 ML-5	2506138-3	A	18-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (37-1391 ML-5	2506138-4	A	18-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (87-1186 (3.5	2506138-5	A	18-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (92-0245 JLSB	2506138-6	A	18-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	MS LIFE INSURANCE CO	RATES (MSL-TX-1 10/	2506205-0	A	21-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (MSL-TX-GP-1	2506205-1	A	21-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	NORTH CENTRAL LIFE I	RATES (275 (3.53 &	2504737-0	A	05-SEP-2001	AP	AP	AP	RATE	CLA	DEVN	2159						Y
CI	OLD UNITED LIFE INSU	RATES (TXCERT-OUL	3, 2510887-0	A	20-NOV-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	OXFORD LIFE INSURANC	RATES (DALLAS UP CR	2497551-0	R	10-MAY-2001	AP	AP	AP	RATE	GCAH	DEVN							Y
CI	PROTECTIVE LIFE INSU	RATES (PLTXMOOLOO(10	2505384-0	A	07-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (PLTXMOODOO(10	2505384-1	A	07-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (TX 8/01 (3.5	2505384-2	A	07-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	RESOURCE LIFE INSURA	RATES (HB 2159 DEVI	2504078-0	A	01-OCT-2001	AP	AP	AP	RATE	GCAH	DEVN	2159						Y
CI		RATES (CEBR-TX (8/0	2505946-1	A	26-OCT-2001	AP	AP	AP	RATE	GCAH	DEVN	2159						Y
CI		RATES (CELR-TX (8/0	2505946-0	A	26-OCT-2001	AP	AP	AP	RATE	GCL	DEVN	2159						Y
CI		RATES (CELL-TX (8/0	2505946-2	A	26-OCT-2001	AP	AP	AP	RATE	GCL	DEVN	2159						Y
CI	SERVCO LIFE INSURANC	RATES (TXRATSGH 9-0	2504727-0	A	07-SEP-2001	AP	AP	AP	RATE	CLA	DEVN	2159						Y
CI		RATES (OEBGMP (3.53	2504727-1	A	07-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (TX-CLDIP2 (3	2504727-2	A	07-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		COASTAL COMMUNITY F	2517625-0	A	04-FEB-2002	AP	AP	AP	RATE	GCLA	DEVN							Y
CI	SERVICE LIFE AND CAS	RATES (TX 692 93.	2503666-0	A	17-SEP-2001	AP	AP	AP	RATE	CLA	DEVN	2159						Y
CI	SOUTHERN PIONEER LIF	TEX CLAH RATES (9/2	2507616-0	A	17-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	STANDARD GUARANTY LI	DEALER POOL	2496044-0	A	02-MAY-2001	AP	AP	AP	RATE	GCAH	DEVN	M						Y
CI		KINSEL FORD LINCOLN	2496970-0	A	02-MAY-2001	AP	AP	AP	RATE	GCAH	DEVN							Y
CI		AL MEYER FORD (HP98	2496971-0	A	02-MAY-2001	AP	AP	AP	RATE	GCAH	DEVN							Y
CI		ELVIN HAYES FORD (H	2496972-0	A	02-MAY-2001	AP	AP	AP	RATE	GCAH	DEVN							Y
CI		RATES (GOP(3.50 (3.	2506206-0	A	21-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	SURETY AMERICAN LIFE	RATES (3 UML(3.53)	2510784-0	A	20-NOV-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	TEXAS SAVINGS LIFE I	RATES (3 TSL (3.53)	2511895-0	A	21-DEC-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	TRANS-NATIONAL LIFE	RATES (TNLIC-2CL (T	2506706-0	A	24-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (2CL (TX3.53)	2506706-1	A	24-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI	UNIVERSAL UNDERWRITE	RATES (42-864L (3/9	2505897-0	A	05-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (42-864D (3/9	2505897-1	A	05-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (864 (3/97) 3	2505897-2	A	05-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y
CI		RATES (42-865L (3/9	2505897-3	A	05-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159						Y

< CODOCS > RUN DATE: APRIL 8TH, 2002 1:43:25 PM

A LIST OF SPECIFIED FORMS

SECT	COMPANY NAME	FORM NUMBER	FILING ID	FILING TYPE	COMPLETE DATE	COMPLETE STATUS	CU	ST	DES1	DES2	DES3	DES4	DES5	RL YR	RL NO.	RL FILE	POST FRAME	I
CI	UNIVERSAL UNDERWRITE	RATES (42-865D (3/9	2505897-4	A	05-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159		Y				Y
CI		RATES (865 (3/97) 3	2505897-5	A	05-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159		Y				Y
CI		RATES (180 (3/97) 3	2505897-6	A	05-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159		Y				Y
CI	VOYAGER LIFE INSURAN	RATES (CR-3069 (3.5	2506202-0	A	10-SEP-2001	AP	AP	AP	RATE	GCLA	DEVN	2159		Y				Y
CI	WESTERN BANKERS LIFE	RATES (BL100 TX (3.	2508248-0	A	31-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159		Y				Y
CI		RATES (BL200 TX (3.	2508248-1	A	31-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159		Y				Y
CI		RATES (BL300 TX (3.	2508248-2	A	31-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159		Y				Y
CI		RATES (BL400 TX (3.	2508248-3	A	31-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159		Y				Y
CI		RATES (BL500 TX (3.	2508248-4	A	31-OCT-2001	AP	AP	AP	RATE	GCLA	DEVN	2159		Y				Y

< CODDOCS > RUN DATE: APRIL 8TH, 2002 1:43:25 PM
 168 rows selected.

FACSIMILE TRANSMITTAL SHEET

TO: NANCY WAIDELICH FROM: KELLY FOSTER
FAX NUMBER: 512-322-3552 DATE: SEPTEMBER 17, 2001
COMPANY: TEXAS DEPT. OF INS. TOTAL NO. OF PAGES INCLUDING COVER: 3
PHONE NUMBER: SENDER'S REFERENCE NUMBER:
RE: YOUR REFERENCE NUMBER:

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY PLEASE RECYCLE

NOTES/COMMENTS:

Nancy,

As you requested via our telephone conversation on Friday, I have had the Actuarial Department prepare new rate schedules per your direction. The disability rate schedule now reflects the correct rates and we have truncated to two decimal places. Not rounded.

We have added the word **DECREASING** to the Gross Life rate schedule heading.

Please consider this as our statement that you said was required.

In order to remain competitive in the industry, American Health and Life Insurance Company has filed for use an increase of our Life and Disability. We will use rates that are 130% of Prima Facie.

If you have any questions or require further assistance, please do not hesitate to contact me.

Thanks,


Kelly Foster, Policy Analyst

110 West Seventh Street
Suite 800
Fort Worth, Texas 76102-7032
Telephone 817.390.1700
Facsimile 817.390.1234

Internet: www.assurant.com

Assurant Group

August 31, 2001

Article 3.42 (C)

Filings Intake Division, Mail Code 106-1E
Texas Department of Insurance
Life/Health Group
333 Guadalupe
P.O. Box 149104
Austin, Texas 78714-9104

RE: AMERICAN BANKERS LIFE ASSURANCE COMPANY OF FLORIDA
NAIC# 60275
Rate Filing pursuant to House Bill 2159

Dear Commissioner:

We are submitting this filing under "File and Use" on behalf of the above referenced company. The attached rates are being submitted pursuant to House Bill 2159 and we request an effective date of September 1, 2001. The rate increase is needed to offset less than anticipated income (investment income) and higher acquisition expenses. *

Also, included is a list of the forms that the rates will be used with.

If you should have any questions regarding this filing, please feel free to contact me at (800) 334-9282, extension 1229. My fax number is (817) 390-2662.

Sincerely,

Patti Bohannon

Patti Bohannon, Paralegal
Sr. Policy Filings Analyst
Patti_Bohannon@Assurant.com



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Assurant is part of the Fortis group

copy

**AMERICAN
GENERAL
FINANCIAL GROUP**

September 4, 2001

American General
Assurance Company

Ms. Nancy Waidelich
Insurance Specialist III
Group Life and Accident and Health Division
Texas State Board of Insurance
Mail Code 9999
P.O. Box 149104
Austin, Texas 78714-9104

Re: American General Assurance Company - File ID #2504241
Credit Life and Disability Rates, House Bill 2159

VIA FAX AND U.S. MAIL

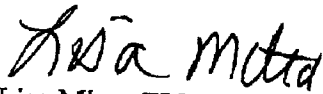
Dear Ms. Waidelich:

We have received your letter dated August 31, 2001. Thank you for taking the time to discuss this matter with us earlier today.

Pursuant to our conversation, we would like to advise the Board why we intend to use the rates as permitted by House Bill 2159 (130% of your published substantive rates). Our experience suggests that the higher rates are needed in order to remain competitive in the Texas insurance marketplace.

We hope you find this response sufficient. Please feel free to contact me if you need any further information.

Very truly yours,



Lisa Mitra, FLMI, AIRC
Associate Director
Pre-Sales Compliance
(800) 323-4747, ext. 6174
e-mail: Lisa.Mitra@agfg.com

Enclosures

American General Assurance Company
Member American General Financial Group
1000 East Woodfield Rd. - Schaumburg, IL 60173

distributing products issued by: All American Life Insurance Company, American General Assurance Company, American General Indemnity Company,
American General Life Insurance Company of Pennsylvania, North Central Life Insurance Company,
The Old Line Life Insurance Company of America - Members American General Financial Group

**AMERICAN
NATIONAL**

AMERICAN NATIONAL INSURANCE COMPANY

CREDIT INSURANCE DIVISION

P.O. BOX 1785 GALVESTON, TEXAS 77553-1785 800/899-6502 www.anico.com

October 2, 2001

Ms. Ann M. Smith-Daley
Deputy Insurance Commissioner
Life/Health Division - MC 106 - 1E
Life, Annuity & Credit Section
Texas Department Of Insurance
P.O. Box 149104
Austin, TX 78714-9104

RE: Credit Disability Insurance
Request for Deviated Presumptive Rate, per House Bill 2159
Withdrawal of Deviated Presumptive Rate, 28 TAC ss.3.5602

Dear Ms. Smith-Daley:

In response to earlier conversations with Ms. Virginia Castillo -Vera, and Ms. Jackie Robinson who had several questions concerning the above reference filing, please find enclosed explanations to the questions that were asked.

Attached are the disability tables, in which rates 1&2 for 14-day and rates 1-6 for 30 days now have the disclosure for refunds only.

The classes of Business we are going to use on this rate will be all classes of Business.

Regarding the reason for the 130% filing is that American National made this filing because we do not believe the existing presumptive rates contain adequate margins or allowances for compensation to producers, insurer expenses or insurer profits.

Please feel free to call Charlie Delgado or me at 800-899-6502, if you have any questions or need any additional information.

Sincerely,

Stephanie Glaser
Policy Filing/Compliance Coordinator

CC: Virginia Castillo-Vera
Jackie Robinson



Automated Financial Indemnity Company

4545 Post Oak Place, Suite 302 • Houston, TX 77027 • Fax (713) 622-4060 • (713) 622-1080

ACEI

September 13, 2001

SEP 18 2001

Texas Department of Insurance
Mr. Eli Guerrero, Insurance Specialist
Life/Health Filing Intake-M./C 1061E
P.O. Box 149104
Austin, Texas 78714-9104



pd. 100000
000812

Dear Mr. Guerrero:

The enclosed rate filing is submitted in accordance with House Bill 2159. Automated Financial Indemnity Company requests the attached 30% increase over the presumptive rates in order to maintain long-term financial stability, remain competitive in the Texas market, and to be able better serve the policy holders of Texas.

Your prompt attention to this request will be appreciated. Please contact me if you need additional information.

Sincerely,

Chris Kelley
Secretary/Treasurer



November 14, 2001

Texas State Board of Insurance
P.O. Box 149104
Austin, Texas 78714-9104

NOV 28 2001



Attention: Policy Review Section

**RE: BALBOA LIFE INSURANCE COMPANY - NAIC#68160, FEIN# 95-2566317
GROUP CREDIT LIFE AND DISABILITY INSURANCE
MONTHLY OUTSTANDING BALANCE RATE FILING**

In response to Texas House Bill 2159 which was effective September 1, 2001, we are enclosing revised rate schedules for monthly outstanding balance credit life and disability insurance. These rates are 30% higher than the prima facie rates which were approved by your department on July 10, 2000.

We are filing these rates for competitive purposes. These rates will be used in conjunction with the following forms approved by your department on January 26, 1993:

Group Life Policy	9P432R0193 (3.53) RA
Group Disability Rider	9R219R0193 (3.53) RA
Life and Disability Certificate	9CX548R0193 (3.53) RA

005681
Pat. 12/20/01

We hope this filing meets with your approval. If you have any questions, you may contact me at the phone number or email address listed below. Thank you for your consideration. We look forward to your reply.

Sincerely,

Kathrine Geralde
Compliance Specialist

Telephone: (800) 854-6115, ext. 4614
Facsimile: (949) 724-1267
E-mail: kathrine_geralde@balboainsurance.com

Enclosures

APPROVED
ANA SMITH-DALEY
DEC 21 2001
DEPUTY INSURANCE COMMISSIONER
Life / Health Group
State of Texas

WALKER GROUP



WGI INSURANCE SERVICES

September 13, 2001

RE: Baltimore Life Insurance Company


Ms. Nancy Waidelich
Texas Department of Insurance
333 Guadalupe
Austin, Tx 78701

Dear Ms. Waidelich,

Thank you for your call today regarding the rate filing for Baltimore Life Insurance Company's Credit Insurance rates.

Pursuant to your request, we believe a rate increase is warranted because the credit insurance rates in Texas have been significantly reduced over a fairly short period of time. While these rates have been reduced the expenses for the administration of a credit insurance program have not reduced, in fact the expenses have increased over the same period of time. I feel the rate increase is necessary to cover administration expenses, maintain profit margins and assure the financial stability of the Insurer.

Sincerely,



Jason Fletcher
General Manager
WGI Insurance Services

AUL

American United Life Insurance Company®
One American Square
P.O. Box 368
Indianapolis, Indiana 46206-0368
Telephone (317) 285-1877

September 24, 2001

FAX 312-322-3552

Nancy Waidelich
Texas Department of Insurance
Life/Health Group
Attn: Filings Intake Division
Mail Code 106-1E
Austin, TX 78714-9104

Re: Filing of Group Credit Life and Disability Insurance Rates
American United Life Insurance Company - NAIC #60895
G-RATES(44)C (3.53), (3.50) Credit life and A&H rates

Your phone calls: September 20 and September 21, 2001

Dear Ms. Waidelich:

Here are the life rates broken down in the format you requested on the phone on September 20 and September 21, 2001. You stated that you would permit us to fax in these rates.

You also requested a statement concerning the reason we are requesting the 30% rate increase. We need the rate increase to remain competitive in the Texas Credit Insurance market.

We trust that you will now find our submission in compliance with Texas regulatory and statutory provisions.

You may call me collect at (317) 285-1809 or contact me by e-mail at Bridget_McGill@aul.com if you have any questions. Thank you for all your help with this filing.

Sincerely,



Bridget McGill
Senior Contract Analyst
Group Contracts and Compliance

Enclosures



INSURANCE
MARKETPLACE
STANDARDS
ASSOCIATION

Membership promotes ethical market conduct for individual life insurance and annuities

#6329 P.002

FINANCIAL INST

SEP.24.2001 14:17 3172854162

JANET CHRISTOFFERSEN, ALHC
Policy Drafter & Compliance Specialist II
Credit Insurance Division
(402) 399-3467



Central States Health & Life Co. of Omaha

October 1, 2001

RECEIVED

Texas Department of Insurance
Life/Health Division - Mail Code 106-1E
Attention: Filing Intake
P.O. Box 149104
Austin, TX 78714-9104

OCT 4 2001



Attention: Nancy Waidelich

Re: Central States Health & life Co. of Omaha – NAIC #690-61751
Single Premium Credit Life and Disability Insurance
Form CR-1173 (3.53) – Rate & Refund Schedule (Prima Facie + 30%)
Form CR-1174 (3.53) – Rate & Refund Schedule (12 MCPD + 30%)
Form CR-1175 (3.53) – Rate & Refund Schedule (24 MCPD + 30%)
Form CR-1176 (3.53) – Rate & Refund Schedule (36 MCPD + 30%)

002067

pdh/10/01

Dear Ms. Waidelich:

Pursuant to HB 2159, we are requesting your approval of a 30% rate increase for credit life and disability insurance. The rate schedules listed above represent a 30% increase above the presumptive rates in Texas.

Our intent is to use the presumptive credit rates, but we are filing a 30% increase for use when necessary due to competition or higher losses. These new rate schedules would be used with policy Form 30470I TX (3.53), previously approved on July 3, 2001, and Form 304251 2nd Rev. TX (3.53), previously approved on February 20th 1998. No changes are being made to the policy forms.

Your review and acknowledgement of receipt would be appreciated. Thank you for your attention in this matter.

Respectfully,

Handwritten signature of Janet Christoffersen in cursive.

Janet Christoffersen, ALHC
Policy Drafter and Compliance Special
E-mail: jchristoffersen@cs.com

96th and Western • Omaha, Nebraska 68114 • Phone: (402) 397-1111

Mailing Address: P.O. Box 34350 • Omaha, Nebraska 68134-0350

A CENTRAL STATES OF OMAHA COMPANY

SNEED, VINE & PERRY
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
901 CONGRESS AVENUE
AUSTIN, TEXAS 78701

TELEPHONE (512) 476-6955
TELECOPIER (512) 476-1825
TELECOPIER (512) 482-8116

MAILING ADDRESS:
P.O. BOX 1409
AUSTIN, TEXAS 78767-1409

September 17, 2001

Ms. Nancy Waidelich, Insurance Specialist III
Life/Health Division
Texas Department of Insurance
Hobby 1, 6th Floor
333 Guadalupe
Austin, TX 78701

RECEIVED

SEP 17 2001

Division of Insurance
Texas Department of Insurance

Dear Ms. Waidelich:

We have been asked by Enterprise Life Insurance Company (the "Company") to help respond to your telecopy of August 31, 2001 (the "Telecopy") regarding the Company's recent disclosure filing under H.B. 2159. Please regard this letter as the Company's response to the Telecopy.

Neither the Company nor I was involved in the legislative effort regarding the passage of H.B. 2159; however, both Company officers and I monitored the testimony and progress of this bill during the last legislative session. I have also investigated the reasons for Representative Senfronia Thompson's efforts to provide a deviation opportunity to insurance companies writing credit insurance in Texas. Based on my review of the legislative history, and based on discussions with persons working at the Capitol last session, it is clear that H.B. 2159 authorizes companies selling credit insurance to deviate from the presumptive rate by as much as 30%. No regulatory approval is required for such a deviation under the plain language of the bill.

Section 4 of H.B. 2159 requires the Commissioner to submit a report to the 79th legislature stating the effect made by this bill on the rates charged for credit insurance. There is no provision in the new statute requiring the Commissioner to explain to the 79th legislature why various companies have elected to implement the authorized deviations from the presumptive rate. I see no connection, therefore, between any company's reason for deviation and the report by the Commissioner to the legislature.

As background information, please note that the Company is a Texas domiciled company formed in 1978. The Company does credit

September 17, 2001

Page 2

insurance business by way of direct writings or reinsurance in 23 states. The home office has been located in the Dallas/Ft. Worth area since its formation. The Company has a working relationship with over 100 Texas automobile dealerships and employs 67 Texas residents.

For many years, the Texas rate for credit insurance remained steady at \$.50 per hundred dollars of coverage per year. Over the last several years, the rate has decreased steadily until April 2000 when it reached an all time low of \$.29 (this includes application of discount factor.) This is a decrease of almost 50% over approximately the last ten years.

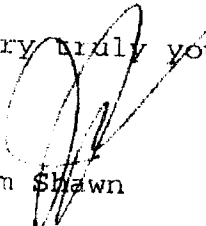
This rate history illustrates the difficult business climate for Company operations in Texas. The Company's experience provides the basis for my conclusion that the current presumptive rate is too low, and I believe part of the reason is that acquisition costs (and the costs of a company's business sources) are not sufficiently incorporated into the Texas rate making formula.

In order to improve the financial stability of the Company, and in order to allow the Company an opportunity to compete for Texas business in the future, the Company has established new rates as sanctioned by the recent legislation.

The Company believes that the new rates provide customers with a choice to purchase this type of insurance at a competitive price with underwriting standards that are not as strict as ones they would face in the purchase of typical term or whole life insurance policies. Customers who have more cost effective choices for insurance coverage will not be forced to purchase insurance from the Company.

Please contact me or Susan Austin at the Company (972-445-8319) if you have a follow up question.

Very truly yours,


Jim Shawn

JLS:lsm



CEI

September 10, 2001

SEP 18 2001

Ms Anna Smith-Dailey
Deputy Commissioner
Life/Health Division-Life, Annuity & Credit Section, MC 106-1E
Texas Department of Insurance
333 Guadalupe
Austin, TX 78714-9104

CEI
18

RE: Financial American Life Insurance Company, NAIC #71455
Individual Credit Life and Accident & Health Insurance
Filing ID # 2451543
Revised Rate submission

pd. 160.00
000779

Dear Ms. Smith-Dailey,

Pursuant to the enactment of HB 2159 effective 9/1/2001, we are submitting new credit life and new credit accident & health premium rates for review and approval to be utilized with our forms approved 11/17/2000 under Filing ID # 2451543. Our primary class of business will be automobile loan transactions.

While we have not generated any premium under the premium rates approved 11/17/2000, we feel it is justified to submit the premium rates authorized under HB 2159 for several reasons.

1. The premium rate we are submitting is no more than 30% higher or lower than the presumptive rate established by the Commissioner
2. To avoid discrimination and competititive disadvantage in Texas:
 - a. We should be allowed to compete with other insurance companies on an equal basis in having the ability to offer the same premium rates for similar class of business, whether we are new in the market or have been operating for many years in Texas.
 - b. We should be allowed to offer the same compensation amount (dollar amount) based upon the same premium rate for similar class of business whether we are new in the market or have been operating for may years in Texas.

We are aware from conversation with Department personnel and industry contacts, that most, if not all insurance companies writing a similar class of business in the State of Texas have already been approved for the new rate increase promulgated by HB 2159 or are in the process of submitting a new rate filing. We do not think the State of Texas desires to foster unfair competition among insurance companies writing similar classes of business by only allowing certain companies the unfair advantage of offering the new rate structure.

We look forward to hearing from you soon.



FAX

JM & Associates
500 NW 12th Avenue
Deerfield Beach, Florida 33442

Date August 31, 2001

Number of pages including cover sheet _____

To: **Virginia Vera**
Texas Insurance Dept.

From: **DeAnna Martos**
Legal Department

Phone 512/305-7276

Fax Phone 512/322-3552

CC: _____

Phone (954) 429-2118 or

(800) 488-2144, Ext. 2118

Fax Phone (954) 418-5088

REMARKS:

- Urgent
- For your review
- Reply ASAP
- Please comment

Virginia,

As you requested, here are the updated disability rates. We did discover the error in the spreadsheet prior to implementing them with our accounts, we just forgot to send you the updates.

These rates are for all classes of business. The reason for the deviation is so that JMIC will be competitive in the marketplace since the passage of Texas House Bill 2159. As the bill allows an upward deviation of up to 30% without justification, we feel that JMIC must take advantage of this allowed increase in order to maintain a level playing field in the industry.

Also, as you requested, JMIC's refund method for decreasing life and disability coverage is the Rule of Anticipation (also known as the Pure Premium or the Actuarial method).

If you have any other questions, please feel free to contact me. Thank you for your assistance.

Rudd and Wisdom, Inc.

CONSULTING ACTUARIES

Mitchell L. Bilbe, F.S.A.
Christopher R. Bucknall, A.S.A.
Amanda L. Chipuk, A.S.A.
Philip S. Dial, F.S.A.
Charles V. Faerber, F.S.A., A.C.A.S.
Mark R. Fenlaw, F.S.A.
Carl L. Frammolino, F.S.A.
David Huff, F.S.A.
Joe C. Lopez, A.S.A.

7718 Wood Hollow Drive, Suite 200
Austin, Texas 78731-1601

Post Office Box 26008
Austin, Texas 78755-0008

Phone: (512) 346-1590

Fax: (512) 345-7437

E-mail: eddie@ruddwisdom.com

Robert M. May, F.S.A.
J. Christopher McCaul, F.S.A.
Edward A. Mire, F.S.A.
Rebecca B. Morris, A.S.A.
Michael J. Muth, F.S.A.
Julie L. Normand, A.S.A.
Ronald W. Tobleman, F.S.A.
David G. Wilkes, F.S.A.

Date: 9/5/01

Billing/Client # 21203

of pages *including* cover page: 16

Time Sent:

To: Nancy Waidelich

From: Eddie Mire

Texas Dept of insurance

305-7287

Telephone

322-3552

Fax

Re: Magna Insurance Company - Credit Rate Filing ID#2505898

Additional Comments: Per our phone conversation on Tuesday, attached are the revised credit rates for Magna Insurance Company. The reason for the 30% increase in rates is that House Bill 2159 allows such an increase and they would like to stay profitable in the state of Texas.

If you require anything else, please don't hesitate to call.

If there are problems with this transmission please contact Eddie at (512)346-1590.

Original will NOT follow

Original WILL follow via:
 Regular Mail Hand Delivery
 Overnight Delivery Other

**AMERICAN
GENERAL
FINANCIAL GROUP**

MERIT LIFE INSURANCE CO.
601 N.W. Second Street • P.O. Box 39
Evansville, IN 47701-0039 • 800.325.2147
Member American General Financial Group

September 13, 2001

Nancy Waidelich
Credit Analyst
Texas Department of Insurance
333 Guadalupe
PO Box 149104
Austin, TX 78714-9104

VIA FAX#: 512-322-3552

Re: Merit Life Insurance Co.
Rate Filing of September 4, 2001
For use with Forms ML3-285-TX (3.05)(3.53) et al.

NACI # 65951

Dear Ms. Waidelich:

Thank you for contacting us by phone today regarding the above mentioned submission.

As discussed in your conversation with Susan Fuesting, the only item needed for your approval of this filing is a statement from Merit of its reason for asking for this increase. Merit Life Insurance Co. has requested this increase in order to remain competitive in the Texas marketplace.

Please do not hesitate to contact me if you require any further information at 1-800-325-2147 ext. 2839.

Sincerely,



Deanna K. Yarbrough
Director of Insurance Systems and
Product Support

**AMERICAN
GENERAL**
FINANCIAL GROUP

MERIT LIFE INSURANCE CO.

601 N.W. Second Street • P.O. Box 39
Evansville, IN 47701-0039 • 800.325.2147

Member American General Financial Group

October 2, 2001

RECEIVED

OCT 10 2001

Belinda Reveles
Texas Department of Insurance
Filing Intake Division; MC 9999
333 Guadalupe
PO Box 149104
Austin, TX 78714-9104



Re: Credit Life and Disability Rate Filing
For Use with Forms ML3-627-TX(3.53 & 3.50) et al.

NAIC #65951

Dear Ms. Reveles:

002455 *pd. 10/2/01*

We are submitting for your review and approval the following rate schedules for use with forms ML3-627-TX(3.53 & 3.50) et al. filed and approved by your Department on September 21, 2001.

1. Credit Life Rates for use with ML3-627-TX(3.53 & 3.50)
2. Credit Disability Rates for use with ML3-627D-TX (3.53 & 3.50)

This filing is being made in response to House Bill 2159 effective September 1, 2001 which allows insurers to file and use credit life and disability rates which are 30% higher than prima facie. We are requesting this increase in order to remain competitive in the Texas marketplace.

A copy of Merit's previous approval is enclosed for your reference. Our check for the filing fee in the amount of \$100.00 is also enclosed.

Should you find the enclosed rates acceptable, please return a copy of this letter and each rate schedule stamped "Approved" for our records.

Sincerely,

Deanna K. Yarbrough
Director of Insurance Systems and
Product Support

DKY/kgs

Enclosures

Rudd and Wisdom, Inc.

CONSULTING ACTUARIES

Mitchell L. Bilbe, F.S.A.
Christopher R. Bucknall, A.S.A.
Amanda L. Chipuk, A.S.A.
Philip S. Dial, F.S.A.
Charles V. Faerber, F.S.A., A.C.A.S.
Mark R. Fenlaw, F.S.A.
Carl L. Frammolino, F.S.A.
David Huff, F.S.A.
Joe C. Lopez, A.S.A.

7718 Wood Hollow Drive, Suite 200
Austin, Texas 78731-1601
Post Office Box 26008
Austin, Texas 78755-0008
Phone: (512) 346-1590
Fax: (512) 345-7437
E-mail: rww@ruddwisdom.com

Robert M. May, F.S.A.
J. Christopher McCaul, F.S.A.
Edward A. Mire, F.S.A.
Rebecca B. Morris, A.S.A.
Michael J. Muth, F.S.A.
Julie L. Normand, A.S.A.
Ronald W. Tobleman, F.S.A.
David G. Wilkes, F.S.A.

NOV 28 2001

November 26, 2001

Ms. Belinda Reveles
Supervisor
Administration & Filings Intake Division
Texas Department of Insurance
Post Office Box 149104
Austin, Texas 78714-9104

CE
A
P.L. 11/26/01

Re: Change in Credit Life Premium Rates
McDonald Life Insurance Company
Form MCD-003-REV(3.53)6/92

Dear Belinda:

We are filing a change in our credit life insurance rates pursuant to Article 3.53 Section 8A(5), Texas Insurance Code, as amended by House Bill 2159. As shown in the attached rate form, we have increased the rates by no more than 30% above the current presumptive rates.

The reason for the rate change is that the State of Texas allows it and the company would like to stay profitable. We are also enclosing a filing fee of \$100.00 and the proper forms.

If there is anything else you need, please call me and we will deliver it to you promptly. Thank you for your help.

Sincerely,


Eddie Mire

EM:jt

Enclosure



August 31, 2001

(CBI)

SEP 5 2001

Attn: Jerri Nevels
 Filing Intake Division
 Texas Department of Insurance
 Life/Health Group - MC 106-1E
 Hobby Tower I - Sixth Floor
 333 Guadalupe Street
 Austin, TX 78701

Re: Monumental Life Insurance Company - NAIC #558-66281
 Credit Life and Credit Accident and Health Rate Filing Effective - September 1, 2001

1. 70% Rate Tables
2. 130% Rate Tables

Handwritten: (CBI) RA
 Pd. 10/10/01
 000185

Dear Ms. Nevels:

Enclosed for informational purposes are duplicate copies of the above-referenced rates tables. The tables are submitted pursuant to HB 2159, effective September 1, 2001, that allows credit life and credit accident and health rates to deviate by 30%, plus or minus, from presumptive rates. Any deviations greater than 30% will continue to be filed for prior approval and be subject to actuarial justification. The rate tables are submitted under Article 3.53.

The currently filed and approved policy forms with which the rates will be used are shown below, along with their respective approval dates.

<u>Policy Number</u>	<u>Description</u>	<u>Approval Date</u>
✓ 37-1013 (3.50 & 3.53) (RA) ML-53 ✓	Group Outstanding Balance Life Insurance Policy, et al	05/18/92
✓ 87-1176 ML-53 (3.50 & 3.53) ✓	Creditor Group Life Insurance Policy	
✓ 87-1177 ML-53 (3.53) RA ✓	Non-Participating Term Insurance, et al	09/03/92
✓ 37-1388 ML-53 (3.50 & 3.53) ✓	Creditor Group Life Insurance Policy	
✓ 37-1391 ML-53 (3.53) RA ✓	Single or Joint Outstanding Balance, et al	09/03/92
✓ 87-1186 (3.53) ✓	Creditor Group Life Insurance Policy	
✓ 82-0245 JLSPX (3.53) ✓	Closed End Monthly Outstanding Balance Insurance, et al	09/03/92
	Group Master Policy Outstanding Balance Life and	
	Minimum Payment Disability Insurance, et al	09/03/92
	Individual Single Premium Credit Life and Disability Policy,	04/26/94
	et al	
	Individual Single Premium Credit Life and Disability Policy,	05/23/01
	et al	

The required filing fee of \$100 and the General Review Transmittal Form are enclosed, along with a postage-paid, self-addressed envelope. If you have any questions, please call me at 800-445-8154, ext. 8206 or feel free to fax or contact me by e-mail. Your consideration in this matter is greatly appreciated.

Sincerely,

Gloria J. Richardson

Gloria J. Richardson, FLMI, AIRC, ACS
 Compliance Manager
 Direct Phone: 404-257-8206
 Fax: 404-257-8378
 E-Mail: grichardson@aegonusa.com

Assurant Group

110 West Seventh Street
Suite 800
Fort Worth, Texas 76102-7032
Telephone 817.390.1700
Facsimile 817.390.1234
Internet: www.assurant.com

August 31, 2001

Article 3.42 (C)

Filings Intake Division, Mail Code 106-113
Texas Department of Insurance
Life/Health Group
333 Guadalupe
P.O. Box 149104
Austin, Texas 78714-9104

RE: **MS LIFE INSURANCE COMPANY**
NAIC# 83380
Rate Filing pursuant to House Bill 2159

Dear Commissioner:

We are submitting this filing under "File and Use" on behalf of the above referenced company. The attached rates are being submitted pursuant to House Bill 2159 and we request an effective date of September 1, 2001. The rate increase is needed to offset less than anticipated income (investment income) and higher acquisition expenses.

Also, included is a list of the forms that the rates will be used with.

If you should have any questions regarding this filing, please feel free to contact me at (800) 334-9282, extension 1229. My fax number is (817) 390-2662.

Sincerely,

Patti Bohannon

Patti Bohannon, Paralegal
Sr. Policy Filings Analyst
Patti_Bohannon@Assurant.com



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Assurant is part of the Fortis group

copy

**AMERICAN
GENERAL
FINANCIAL GROUP**

North Central Life
Insurance Company

September 4, 2001

Ms. Nancy Waidelech
Insurance Specialist III
Group Life and Accident and Health Division
Texas State Board of Insurance
Mail Code 9999
P.O. Box 149104
Austin, Texas 78714-9104

Re: North Central Life Insurance Company – File ID #2504737
Credit Life and Disability Rates, House Bill 2159

VIA FAX AND U.S. MAIL

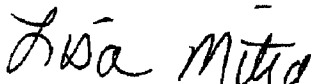
Dear Ms. Waidelech:

We have received your letter dated August 31, 2001. Thank you for taking the time to discuss this matter with us earlier today.

Pursuant to our conversation, we would like to advise the Board why we intend to use the rates as permitted by House Bill 2159 (130% of your published substantive rates). Our experience suggests that the higher rates are needed in order to remain competitive in the Texas insurance marketplace.

We hope you find this response sufficient. Please feel free to contact me if you need any further information.

Very truly yours,



Lisa Mitra, FLMI, AIRC
Associate Director
Pre-Sales Compliance
American General Assurance Company
(800) 323-4747, ext. 6174
e-mail: Lisa.Mitra@agfg.com

Enclosures

North Central Life Insurance Company
Member American General Financial Group
One Woodfield Lake • 1000 Woodfield Road • Schaumburg, IL 60173 • 847.517.6000



EXECUTIVE OFFICES: 8500 SHAWNEE MISSION PARKWAY
MERRIAM, KANSAS 66202
MAILING ADDRESS: P.O. BOX 795
SHAWNEE MISSION, KANSAS 66201
(800) 866-6090
(913) 895-0259
(913) 564-0607 / FAX
WWW.OLDUNITED.COM

OLD UNITED
INSURANCE COMPANIES
(d/b/a VANTAGE CASUALTY COMPANY IN THE STATE OF CALIFORNIA)

November 15, 2001

Texas Department of Insurance
Life/Health Division
P. O. Box 149104
Austin, TX 78714-9104

RECEIVED

NOV 19 2001



005102
pd. \$100.00

RE: Old United Life Insurance Company
Credit Life and Accident and Health Rate Filing

We are enclosing the following rates for your review and approval. These rates will replace the previous rates approved by the Texas Department on June 20, 2000.

Additionally, we are enclosing the Life/Health Group Regular and General Review Transmittal Checklist, Certification, and a check in the amount of \$100.00 for the filing fees. Also, enclosed is a self-addressed stamped envelope for your use in returning a copy of our filing when approved.

We appreciate your review and approval of these rates. If any additional information is needed, do not hesitate to call me at 1-800-866-6090, ext. 201.

Sincerely,

OLD UNITED LIFE INSURANCE COMPANY

Roben L. Shields
Compliance Technician

RLS:
Enclosures

OXFORD

LIFE INSURANCE COMPANY

2721 NORTH CENTRAL AVENUE • PHOENIX ARIZONA 85004 • PHONE (602) 263-8686 • FAX (602) 277-5901 • www.oxfordlife.com

May 4, 2001

Nancy Waidelich
Insurance Specialist III
Life/Health Division – MC 106-1E
Texas Department of Insurance
333 Guadalupe
P.O. Box 149104
Austin, Texas 78714-9104

RESUBMISSION

RE: Oxford Life Insurance Company
Dallas UP Employee Credit Union
Credit A&H Rate Deviation Request
Filing ID: 2487101
Disapproved: 1-22-2001

018265

Dear Ms. Waidelich:

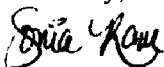
The enclosed filing is submitted for your review and approval. This is a resubmission of the previous January 10, 2001 disapproval letter (attached).

We are requesting a deviated rate of 152.22 percentage be granted for form number 10XFTX (3.53RA). The creditor in which we are filing on behalf of is Dallas UP Employee Credit Union, account number 19003X. The method by which the credibility factor was obtained is an incurred claim count.

Enclosed please find the required CI-DRF forms (A, B, & C), the Texas General Review Transmittal Checklist, a check in the amount of \$100 for the required filing fees, duplicate copies of all forms submitted, and a completed CERT FR. In addition, please find (2) self-addressed postage paid envelopes for your convenience in responding.

If you have any questions or require additional information, please contact me at (888) 757-3732, extension 4431. I appreciate your assistance with this filing. Thank you.

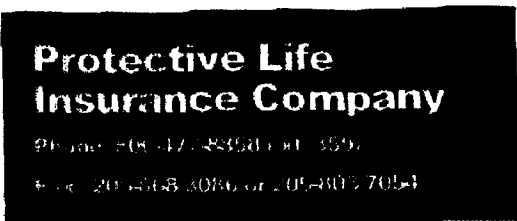
Sincerely,



Sonia Kane
Compliance Coordinator

Enclosures

THE OXFORD FAMILY OF COMPANIES
Oxford Life Insurance Company North American Life Insurance Company
Christian Fidelity Life Insurance Company



Fax

To: Nancy Waidelich, Insurance Specialist III **From:** Janet Northington, Compliance Manager
 Texas Insurance Department

Fax: 512 322-3506 **Date:** September 5, 2001

Phone: 512-305-7287 **Pages:** 1

Re: Credit Life & Disability Rate Filing **CC:**
 Filing ID# 2505384

Urgent For Review Please Comment Please Reply Please Recycle

•Comments:

Nancy, thank you for the phone call and your fax of 8/31/01 regarding our rate submission. As requested, our actuary Mike Presley provided the following statement regarding the reason for a request for rate deviation:

Protective Life's request for rate deviation was submitted to the department on August 21 with an effective date of 9/1/01 for the following reasons:

- 1) In order to compete effectively with other insurers; and
- 2) to provide a level playing field for insurers in the state of TX.

T. Michael Presley, FSA, MAAA Vice President and Actuary

RESOURCE LIFE INSURANCE COMPANY

FOUNDED IN 1963

July 26, 2001

Texas Department of Insurance
Life/Health Group Filings Intake
MC 106-1E
Post Office Box 149104
Austin, Texas 78714-9104

Attn: Life and Health Division

Re: Resource Life Insurance Company NAIC #: 61506 FEIN #: 47-0482911
Single Premium Group Credit Life and Disability Rate Filing
LR-NFSB-TX (8/01) Group Credit Life Insurance Rate Schedule
DR-NFSB-TX (8/01) Group Credit Disability Insurance Rate Schedule

Dear Sirs:

The referenced rates are being submitted as an Informational Filing. Duplicate copies are included along with a completed Transmittal Check List and required filing fee.

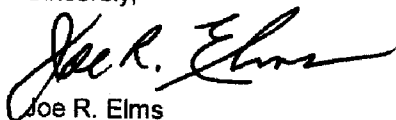
The submitted rates are based on the presumptive rates for credit life and credit accident and health insurance as adopted by Commissioners Order 99-1481, as amended nunc pro tunc by Commissioner's Order No. 00-214. Rates have been increased by 30%. We are electing to deviate from the presumptive rates for credit life and credit accident and health insurance as allowed by Texas House Bill 2159, effective September 1, 2001. The Company plans to use an effective date of September 1, 2001 for issuance of the rates.

The rates will be used in conjunction with our currently approved credit life and disability forms, as indicated below:

FORM	FORM DESCRIPTION	APPROVAL DATE
CA-00-TX (3.53 & 3.50)	Master Policy Application	July 29, 1997
MP-BFSA-TX (3.53 & 3.50)	Master Policy	July 29, 1997
S001-TX (3.53 & 3.50)	Schedule of Coverage & Rates	July 29, 1997
AEO-TX (3.53 & 3.50)	Amendatory Endorsement	October 4, 1999
C-GFSB-TX (3.53 & 3.50)	Certificate of Insurance	October 4, 1999

If you have any questions concerning this filing, please contact the analyst assigned to this filing, Deborah Elms, toll-free at (877) 481-4272, or fax your questions or objections to (817) 481-4674. You may also reach Deborah via e-mail at elms0@gte.net.

Sincerely,



Joe R. Elms
Vice President & Asst. Secretary

Enclosures

CC Deborah Elms
Jay A. Thompson

RESOURCE LIFE INSURANCE COMPANY

FOUNDED IN 1963

Facsimile Transmission: 512-322-3552

October 22, 2001

Texas Department of Insurance
Life/Health Group Filings Intake
MC 106-1E
Post Office Box 149104
Austin, Texas 78714-9104

Attn: Herlinda Rocha
Life and Health Division

Re: Resource Life Insurance Company NAIC #: 61506 FEIN #: 47-0482911
TDI File Number 2505946
Form CELR-TX (8/01) (3.53 & 3.50), Closed End MOB Group Credit Life Rate Sheet
Form CEDR-TX (8/01) (3.53 & 3.50), Closed End MOB Group Credit Disability Rate Sheet
Form CELL-TX (8/01) (3.53 & 3.50), Closed End Monthly Levelized Premium Credit Life Rate Sheet

Per your request, I am attaching revised copies of the referenced life and disability rates, which have been corrected as follows:

1. On life rate schedule CELR-TX (8/01) (3.53 & 3.50) the joint rate has been revised to indicate \$0.936
2. On disability rate schedule CEDR-TX (8/01) (3.53 & 3.50) the rates have been expanded to three digits, which corrects the rounding problems.
3. No changes were made to alternative rate schedule CELL-TX (8/01) (3.53 & 3.50).

These rates will be used with all classes of business, and will be filed for competitive market reasons. If you have any questions or need additional information, please call me toll free at (877) 481-4272. You may reach me by fax at (817) 481-4674 or by email at elms0@gte.net.

Sincerely,



Deborah Elms
Senior Regulatory Analyst



September 6, 2001

VIA FACSIMILE

Ms. Nancy Waidelich
Insurance Specialist III
Life/Health Division - Life, Annuity & Credit Section
Texas Department of Insurance
333 Guadalupe Street
Mail Code 106-1E
Austin, Texas 78701

Re: Servco Life Insurance Company ("Servco")
NAIC Company ID # 99465
Rate Sheets Filing - Credit Life & Credit Disability - House Bill 2159
Filing ID # 2504727

Dear Ms. Waidelich:

Servco hereby submits its response to your fax dated August 31, 2001 requesting additional information regarding the above-referenced rate filing originally submitted on August 10, 2001. Servco made the decision to file the deviation from the presumptive rate filing due to competitive market pressures.

To the best of our knowledge, the filing is in compliance with the provisions of the insurance laws, rules, regulations and bulletins of the State of Texas.

If I may be of further assistance as you complete your review, I can be reached by phone at 713-580-3163 or by fax at 713-580-5171.

Sincerely,

Norma D. Romo
Senior Legal Assistant

/ndr

cc: Diane W. Greene
Mark Haith

2-NORMA.D.ROMO@SERVCO.COM

13201 NORTHWEST FREEWAY, SUITE 801 / HOUSTON, TEXAS 77040
MAILING ADDRESS: PO. BOX 41194 / HOUSTON, TEXAS 77241-1194
FAX (713) 580-5060 (713) 580-3080



**SERVICE
LIFE & CASUALTY
INSURANCE CO.**

September 6, 2001

Herlinda Rocha
Texas Department of Insurance
Life/Health Division -
Life, Annuity & Credit Section
MC 106-1E, 333 Guadalupe
P.O. Box 149104
Austin, Texas 78714-9104

Via Facsimile: 512/322-3506

SEP 10 2001

Re: Credit Rate Filing No. 2503666

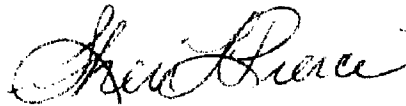
Dear Ms. Rocha:

This letter is in response to your fax of September 4, 2001.

The first issue raised in your letter is the assertion that the rate filing is not complete. This assertion is incorrect. At this time, Service Life and Casualty has filed a rate schedule for all of the rates it intends to use. If Service Life and Casualty determines to utilize any additional rates than what has already been filed, the appropriate filing will be made.

Second, your letter asks for the specific reason for the filing of a rate above the presumptive rate. Service Life's experience under the presumptive rate is that the rate is inadequate to cover the actual expenses of doing business and providing the company and its shareholders with an adequate return on investment. The actual business conditions under which Service Life and Casualty operates caused the presumptive rate to be confiscatory.

Very truly yours,



Sheri L. Pierce
Compliance Administrator

110 West Seventh Street
Suite 800
Fort Worth, Texas 76102-7032
Telephone 817.390.1700
Facsimile 817.390.1234

Internet: www.assurant.com

Assurant Group

Article 3.42 (C)

August 31, 2001

Filings Intake Division, Mail Code 106-1E
Texas Department of Insurance
Life/Health Group
333 Guadalupe
P.O. Box 149104
Austin, Texas 78714-9104

RE: STANDARD GUARANTY LIFE INSURANCE COMPANY
NAIC# 98884
Rate Filing pursuant to House Bill 2159

Dear Commissioner:

We are submitting this filing under "File and Use" on behalf of the above referenced company. The attached rates are being submitted pursuant to House Bill 2159 and we request an effective date of September 1, 2001. The rate increase is needed to offset less than anticipated income (investment income) and higher acquisition expenses.

Also, included is a list of the forms that the rates will be used with.

If you should have any questions regarding this filing, please feel free to contact me at (800) 334-9282, extension 1229. My fax number is (817) 390-2662.

Sincerely,

Patti Bohannon

Patti Bohannon, Paralegal
Sr. Policy Filings Analyst
Patti_Bohannon@Assurant.com



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Rudd and Wisdom, Inc.

CONSULTING ACTUARIES

Mitchell L. Bilbe, F.S.A.
Christopher R. Bucknall, A.S.A.
Amanda L. Chipuk, A.S.A.
Philip S. Dial, F.S.A.
Charles V. Faerber, F.S.A., A.C.A.S.
Mark R. Fenlaw, F.S.A.
Carl L. Frammolino, F.S.A.
David Huff, F.S.A.
Joe C. Lopez, A.S.A.

7718 Wood Hollow Drive, Suite 200
Austin, Texas 78731-1601

Post Office Box 26008
Austin, Texas 78755-0008

Phone: (512) 346-1590

Fax: (512) 345-7437

E-mail: rw@ruddwisdom.com

Robert M. May, F.S.A.
J. Christopher McCaul, F.S.A.
Edward A. Mire, F.S.A.
Rebecca B. Morris, A.S.A.
Michael J. Muth, F.S.A.
Julie L. Normand, A.S.A.
Ronald W. Tobleman, F.S.A.
David G. Wilkes, F.S.A.

CEIV

NOV 15 2001

November 14, 2001

Ms. Belinda Reveles
Supervisor
Administration & Filings Intake Division
Texas Department of Insurance
Post Office Box 149104
Austin, Texas 78714-9104



Re: Change in Credit Life Premium Rates
Surety American Life Insurance Company
Form 3 UML(3.53)9/92

Dear Belinda:

We are filing a change in our credit life insurance rates pursuant to Article 3.53 Section 8A(5), Texas Insurance Code, as amended by House Bill 2159. As shown in the attached rate form, we have increased the rates by no more than 30% above the current presumptive rates.

The reason for the rate change is that the State of Texas allows it and the company would like to stay profitable. We are also enclosing a filing fee of \$100.00 and the proper forms.

If there is anything else you need, please call me and we will deliver it to you promptly. Thank you for your help.

Sincerely,


Eddie Mire

EM:jt

Enclosure

Rudd and Wisdom, Inc.

CONSULTING ACTUARIES

Mitchell L. Bilbe, F.S.A.
Christopher R. Bucknall, A.S.A.
Amanda L. Chipuk, A.S.A.
Philip S. Dial, F.S.A.
Charles V. Faerber, F.S.A., A.C.A.S.
Mark R. Fenlaw, F.S.A.
Carl L. Frammolino, F.S.A.
David Huff, F.S.A.
Joe C. Lopez, A.S.A.

7718 Wood Hollow Drive, Suite 200
Austin, Texas 78731-1601
Post Office Box 26008
Austin, Texas 78755-0008
Phone: (512) 346-1590
Fax: (512) 345-7437
E-mail: rw@ruddwisdom.com

Robert M. May, F.S.A.
J. Christopher McCaul, F.S.A.
Edward A. Mire, F.S.A.
Rebecca B. Morris, A.S.A.
Michael J. Muth, F.S.A.
Julie L. Normand, A.S.A.
Ronald W. Tobleman, F.S.A.
David G. Wilkes, F.S.A.

CEIV

DEC 3 2001

pd. 100 us

November 30, 2001

Ms. Belinda Reveles
Supervisor
Administration & Filings Intake Division
Texas Department of Insurance
Post Office Box 149104
Austin, Texas 78714-9104

ⓔ
ⓐ

Re: Change in Credit Life Premium Rates
Texas Savings Life Insurance Company
FORM 3 TSL (3.53) 9/92

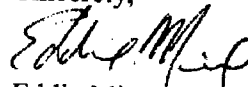
Dear Belinda:

We are filing a change in our credit life insurance rates pursuant to Article 3.53 Section 8A(5), Texas Insurance Code, as amended by House Bill 2159. As shown in the attached rate form, we have increased the rates by no more than 30% above the current presumptive rates.

The reason for the rate change is that the State of Texas allows it and the company would like to stay profitable. We are also enclosing a filing fee of \$100.00 and the proper forms.

If there is anything else you need, please call me and we will deliver it to you promptly. Thank you for your help.

Sincerely,



Eddie Mire

EM:jt

Enclosure



Trans-National Life Insurance Company

4545 Post Oak Place, Suite 302 • Houston, TX 77027 • (713) 622-1080

September 13, 2001

SEP 18 2001

Texas Department of Insurance
Mr. Eli Guerrero, Insurance Specialist
Life/Health Filing Intake-M./C 1061E
P.O. Box 149104
Austin, Texas 78714-9104



Pat. 100-10

Dear Mr. Guerrero:

000801

The enclosed rate filing is submitted in accordance with House Bill 2159. Trans-National Life Insurance Company requests the attached 30% increase over the presumptive rates in order to maintain long-term financial stability, remain competitive in the Texas market, and to be able better serve the policy holders of Texas.

Your prompt attention to this request will be appreciated. Please contact me if you need additional information.

Sincerely,

Chris Kelley
Secretary/Treasurer



UNIVERSAL UNDERWRITERS GROUP
7045 College Boulevard • Overland Park, KS 66211-1523

Fax

To: Nancy Waldeich

Texas Dept. of Insurance

From: Karen Allen,

Governmental Affairs Manager

Phone 800-821-7803, ext 1334

Email karen.allen@zurichna.com

Fax 913-906-2194

Fax: 512-322-3552

Phone: 512-305-7287

Pages: 1

Date: September 4, 2001

Re: Credit Life and Disability Rate Filing, House Bill 2159

Filing ID #2505897

This is in response to your fax to me earlier today.

The deviation from presumptive rates is necessary because they are inadequate to cover losses and expenses, provide reasonable margins to attract producers to sell the products, and permit us to earn a profit.

We limit our credit insurance business to automobile, truck and motorcycle dealerships. Therefore, the deviation will apply to credit life and disability insurance written through these businesses.

Please continue your review of this filing and let me know if you need anymore information.

Thank you.

110 West Seventh Street
Suite 800
Fort Worth, Texas 76102-7032
Telephone 817.390.1700
Facsimile 817.390.1234
Internet: www.assurant.com

Assurant Group

CEP

AUG 31 2001

August 31, 2001

Filings Intake Division, Mail Code 106-IF
Texas Department of Insurance
Life/Health Group
333 Guadalupe
P.O. Box 149104
Austin, Texas 78714-9104

CI
A
pl-1000

RE: **VOYAGER LIFE INSURANCE COMPANY**
NAIC# 66699
MS LIFE INSURANCE COMPANY
NAIC# 83380
AMERICAN BANKERS LIFE ASSURANCE COMPANY OF FLORIDA
NAIC# 60275
STANDARD GUARANTY LIFE INSURANCE COMPANY
NAIC# 98884
Rate Filing pursuant to House Bill 2159

Dear Commissioner:

We are submitting this filing under "File and Use" on behalf of the above referenced companies. The attached rates are being submitted pursuant to House Bill 2159 and we request an effective date of September 1, 2001. The rate increase is needed to offset less than anticipated income (investment income) and higher acquisition expenses.

Also, included is a list of the forms that the rates will be used with.

If you should have any questions regarding this filing, please feel free to contact me at (800) 334-9282, extension 1229. My fax number is (817) 390-2662.

Sincerely,

Patti Bohannon

Patti Bohannon, Paralegal
Sr. Policy Filings Analyst
Patti_Bohannon@Assurant.com



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CAPTIVA INSURANCE SERVICES, INC.

Compliance and Product Design Consulting Services

October 31, 2001

Nancy Waidelich
Texas Department of Insurance
Life and Health Division (106-1A) or (9999)
333 Guadalupe Street
Austin, Texas 78714-9104

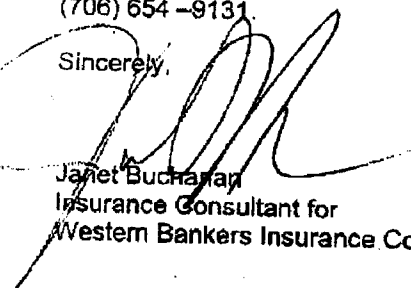
RE: **Western Bankers Insurance Company**
HOUSE BILL 2159

Dear Commissioner Ms. Waidelich:

Attached are the proposed rates that you requested for our rate deviation. We are proposing this rate deviation to remain competitive in the credit life and disability insurance market.

Should you have any questions regarding the attached, please contact me at (706) 654-4827 or contact me via fax at (706) 654-9131.

Sincerely,


Janet Buchanan
Insurance Consultant for
Western Bankers Insurance Company

APPROVED
ANA SMITH-DALEY
OCT 31 2001
DEPUTY INSURANCE COMMISSIONER
Life / Health Group
State of Texas