

October 3, 2019

Thank you for your comments. We have provided clarification to your questions below.

1. Provide the approved file numbers and form numbers for any policy forms eligible for the ESCV program, the number of currently in-force Texas policy holders with these forms, the number previously offered the ESCV option without any ESCV endorsement, the number the company currently intends to offer the ESCV option without offering an endorsement, and the number that the company currently intends to offer the ESCV option with an endorsement after the endorsement is approved by TDI.

Response- We have attached for the requested information on currently approved policy forms eligible for the ECSV endorsement and current inforce policy counts. However, the endorsement is intended to be used with future policy forms similar to those provided. This would include single or survivorship universal life policy forms purchased primarily based on the coverage provided by the secondary guarantee. Note, the number of in-force Texas policy holders provided are as of 8/31/2019.

713 policies received an ECSV offer without an endorsement.

Lincoln does not intend to make any additional ECSV offers without an endorsement.

Enhanced Cash Surrender Value offers take time and resources to implement so Lincoln will evaluate policy forms over time. All policies with the same policy form and in the same actuarially supportable class will be considered for an offer at the same time.

Ultimately the number of ECSV offers made at a given time will be determined as of the Offer Determination Date. As stated in the statement of actuarial intent, policies that are active and in good standing within a policy form and in the same actuarially supportable class will be considered for an offer. No offer will be made:

- if the policy is currently receiving disability waiver benefits or death benefit acceleration benefit
- if the insured is attained age 90 or above or, if the policy is survivorship, the younger insured is attained age 90 or above
- if the policy is unable to be surrendered due to legal or regulatory constraints
- All other policies will receive an offer that has at least a minimum enhancement.

2. Clarify whether the affected forms are closed blocks of business.

Response- The majority of policy forms provided are closed blocks of business. The two exceptions are UL 6000.47 and UL 6008.47, both of which will be closed after 12/31/2019. However, the endorsement is intended to be used with future policy forms similar to those provided. This would include single or survivorship universal life policy forms purchased primarily based on the coverage provided by the secondary guarantee.