November 22, 2019

Ms. Rhonda Ahrens
Chair, Longevity Risk (A/E) Subgroup
National Association of Insurance Commissioners

Via email: Dave Fleming (dfleming@naic.org)

Re: RBC Blank Implementation of Longevity C-2

Dear Rhonda,

On behalf of the Longevity Risk Task Force of the American Academy of Actuaries,[1] I am providing sample changes to risk-based capital (RBC) blanks to implement longevity C-2 factors to assist the Longevity Risk Subgroup.

Changes from the existing blanks are highlighted in yellow in the attached excel file.
- The LRtbd tab was previously provided to calculate the pre-tax longevity C-2 amount based on the factors proposed by the LRTF.
- Changes to LR030 include longevity risk in the calculation of tax effect for C-2.
- Changes to LR031 include longevity risk in the calculation of Net C-2 Post-Tax.

It was necessary to add new lines to LR030 and LR031 for longevity risk. This was done in this sample by adding lines numbered with "b." It may be preferable in a final version to renumber the entire calculation so that longevity risk uses a uniquely numbered line.

Correlation between longevity and mortality is included in the formulas suggested for implementation. The formula includes a TBD Correlation Factor which can be inserted into the formula pending a decision by Life RBC on correlation.

At your request we have also included an alternative formula (provided to the right in the exhibit) that includes a Guardrail Factor that could be used to limit the reduction from correlation. We do not believe this Guardrail Factor is needed as part of the implementation of longevity C-2. If correlation is implemented with the Guardrail Factor, we recommend that it be

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[1] The American Academy of Actuaries is a 19,500-member professional association whose mission is to serve the public and the U.S. actuarial profession. For more than 50 years, the Academy has assisted public policymakers on all levels by providing leadership, objective expertise, and actuarial advice on risk and financial security issues. The Academy also sets qualification, practice, and professionalism standards for actuaries in the United States.

reviewed and phased out over time rather than become a permanent factor increasing the complexity of the RBC calculation.

<p align="center">*****</p>

Should you have any questions or comments regarding this letter, please contact Ian Trepanier, life policy analyst at the Academy (trepanier@actuary.org).

Sincerely,

Paul Navratil, MAAA, FSA
Chairperson, Longevity Risk Task Force
American Academy of Actuaries

CALCULATION OF TAX EFFECT FOR LIFE AND FRATERNAL RISK-BASED CAPITAL

		Source	(1) RBC Amount		Tax Factor	(2) RBC Tax Effect	
	ASSET RISKS						
	Bonds						
(001)	Long-term Bonds – NAIC 1	LR002 Bonds Column (2) Line (2) + LR018 Off-Balance Sheet Collateral Column (3) Line (2)	_____	X	0.1575	= _____	
(002)	Long-term Bonds – NAIC 2	LR002 Bonds Column (2) Line (3) + LR018 Off-Balance Sheet Collateral Column (3) Line (3)	_____	X	0.1575	= _____	
(003)	Long-term Bonds – NAIC 3	LR002 Bonds Column (2) Line (4) + LR018 Off-Balance Sheet Collateral Column (3) Line (4)	_____	X	0.1575	= _____	
(004)	Long-term Bonds – NAIC 4	LR002 Bonds Column (2) Line (5) + LR018 Off-Balance Sheet Collateral Column (3) Line (5)	_____	X	0.1575	= _____	
(005)	Long-term Bonds – NAIC 5	LR002 Bonds Column (2) Line (6) + LR018 Off-Balance Sheet Collateral Column (3) Line (6)	_____	X	0.1575	= _____	
(006)	Long-term Bonds – NAIC 6	LR002 Bonds Column (2) Line (7) + LR018 Off-Balance Sheet Collateral Column (3) Line (7)	_____	X	0.2100	= _____	
(007)	Short-term Bonds – NAIC 1	LR002 Bonds Column (2) Line (10)	_____	X	0.1575	= _____	
(008)	Short-term Bonds – NAIC 2	LR002 Bonds Column (2) Line (11)	_____	X	0.1575	= _____	
(009)	Short-term Bonds – NAIC 3	LR002 Bonds Column (2) Line (12)	_____	X	0.1575	= _____	
(010)	Short-term Bonds – NAIC 4	LR002 Bonds Column (2) Line (13)	_____	X	0.1575	= _____	
(011)	Short-term Bonds – NAIC 5	LR002 Bonds Column (2) Line (14)	_____	X	0.1575	= _____	
(012)	Short-term Bonds – NAIC 6	LR002 Bonds Column (2) Line (15)	_____	X	0.2100	= _____	
(013)	Credit for Hedging - NAIC 1 Through 5 Bonds	LR014 Hedged Asset Bond Schedule Column (13) Line (0199999)	_____	X	0.1575	= _____	†
(014)	Credit for Hedging - NAIC 6 Bonds	LR014 Hedged Asset Bond Schedule Column (13) Line (0299999)	_____	X	0.2100	= _____	†
(015)	Bond Reduction - Reinsurance	LR002 Bonds Column (2) Line (19)	_____	X	0.2100	= _____	†
(016)	Bond Increase - Reinsurance	LR002 Bonds Column (2) Line (20)	_____	X	0.2100	= _____	
(017)	Non-Exempt NAIC 1 U.S. Government Agency	LR002 Bonds Column (2) Line (22)	_____	X	0.1575	= _____	
(018)	Bonds Size Factor	LR002 Bonds Column (2) Line (26) - LR002 Bonds Column (2) Line (21)	_____	X	0.1575	= _____	
	Mortgages						
	In Good Standing						
(019)	Residential Mortgages - Insured	LR004 Mortgages Column (6) Line (1)	_____	X	0.1575	= _____	
(020)	Residential Mortgages - Other	LR004 Mortgages Column (6) Line (2)	_____	X	0.1575	= _____	
(021)	Commercial Mortgages - Insured	LR004 Mortgages Column (6) Line (3)	_____	X	0.1575	= _____	
(022)	Total Commercial Mortgages - All Other	LR004 Mortgages Column (6) Line (9)	_____	X	0.1575	= _____	
(023)	Total Farm Mortgages	LR004 Mortgages Column (6) Line (15)	_____	X	0.1575	= _____	
	90 Days Overdue						
(024)	Farm Mortgages	LR004 Mortgages Column (6) Line (16)	_____	X	0.1575	= _____	
(025)	Residential Mortgages - Insured	LR004 Mortgages Column (6) Line (17)	_____	X	0.1575	= _____	
(026)	Residential Mortgages - Other	LR004 Mortgages Column (6) Line (18)	_____	X	0.1575	= _____	
(027)	Commercial Mortgages - Insured	LR004 Mortgages Column (6) Line (19)	_____	X	0.1575	= _____	
(028)	Commercial Mortgages - Other	LR004 Mortgages Column (6) Line (20)	_____	X	0.1575	= _____	
	In Process of Foreclosure						
(029)	Farm Mortgages	LR004 Mortgages Column (6) Line (21)	_____	X	0.1575	= _____	

† Denotes lines that are deducted from the total rather than added.

Denotes items that must be manually entered on the filing software.

CALCULATION OF TAX EFFECT FOR LIFE AND FRATERNAL RISK-BASED CAPITAL (CONTINUED)

		Source	(1) RBC Amount		Tax Factor	(2) RBC Tax Effect	
(030)	Residential Mortgages - Insured	LR004 Mortgages Column (6) Line (22)		X	0.1575	=	
(031)	Residential Mortgages - Other	LR004 Mortgages Column (6) Line (23)		X	0.1575	=	
(032)	Commercial Mortgages - Insured	LR004 Mortgages Column (6) Line (24)		X	0.1575	=	
(033)	Commercial Mortgages - Other	LR004 Mortgages Column (6) Line (25)		X	0.1575	=	
(034)	Due & Unpaid Taxes Mortgages	LR004 Mortgages Column (6) Line (26)		X	0.1575	=	
(035)	Due & Unpaid Taxes - Foreclosures	LR004 Mortgages Column (6) Line (27)		X	0.1575	=	
(036)	Mortgage Reduction - Reinsurance	LR004 Mortgages Column (6) Line (29)		X	0.2100	=	†
(037)	Mortgage Increase - Reinsurance	LR004 Mortgages Column (6) Line (30)		X	0.2100	=	
	Preferred Stock and Hybrid Securities						
(038)	Unaffiliated Preferred Stock and Hybrids NAIC 1	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (1) + Line (8) + LR018 Off-Balance Sheet Collateral Column (3) Line (9)		X	0.1575	=	
(039)	Unaffiliated Preferred Stock and Hybrids NAIC 2	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (2) + Line (9) + LR018 Off-Balance Sheet Collateral Column (3) Line (10)		X	0.1575	=	
(040)	Unaffiliated Preferred Stock and Hybrids NAIC 3	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (3) + Line (10) + LR018 Off-Balance Sheet Collateral Column (3) Line (11)		X	0.1575	=	
(041)	Unaffiliated Preferred Stock and Hybrids NAIC 4	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (4) + Line (11) + LR018 Off-Balance Sheet Collateral Column (3) Line (12)		X	0.1575	=	
(042)	Unaffiliated Preferred Stock and Hybrids NAIC 5	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (5) + Line (12) + LR018 Off-Balance Sheet Collateral Column (3) Line (13)		X	0.1575	=	
(043)	Unaffiliated Preferred Stock and Hybrids NAIC 6	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (6) + Line (13) + LR018 Off-Balance Sheet Collateral Column (3) Line (14)		X	0.2100	=	
(044)	Preferred Stock Reduction-Reinsurance	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (16)		X	0.2100	=	†
(045)	Preferred Stock Increase-Reinsurance	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (17)		X	0.2100	=	
	Separate Accounts						
(046)	Guaranteed Index	LR006 Separate Accounts Column (3) Line (1)		X	0.1575	=	
(047)	Nonindex-Book Reserve	LR006 Separate Accounts Column (3) Line (2)		X	0.1575	=	
(048)	Separate Accounts Nonindex-Market Reserve	LR006 Separate Accounts Column (3) Line (3)		X	0.1575	=	
(049)	Separate Accounts Reduction-Reinsurance	LR006 Separate Accounts Column (3) Line (5)		X	0.2100	=	†
(050)	Separate Accounts Increase-Reinsurance	LR006 Separate Accounts Column (3) Line (6)		X	0.2100	=	
(051)	Synthetic GICs	LR006 Separate Accounts Column (3) Line (8)		X	0.1575	=	
(052)	Separate Account Surplus	LR006 Separate Accounts Column (3) Line (13)		X	0.1575	=	
	Real Estate						
(053)	Company Occupied Real Estate	LR007 Real Estate Column (3) Line (3)		X	0.2100	=	
(054)	Foreclosed Real Estate	LR007 Real Estate Column (3) Line (6)		X	0.2100	=	
(055)	Investment Real Estate	LR007 Real Estate Column (3) Line (9)		X	0.2100	=	
(056)	Real Estate Reduction - Reinsurance	LR007 Real Estate Column (3) Line (11)		X	0.2100	=	†
(057)	Real Estate Increase - Reinsurance	LR007 Real Estate Column (3) Line (12)		X	0.2100	=	
	Schedule BA						
(058)	Sch BA Real Estate Excluding Low Income Housing Tax Credits	LR007 Real Estate Column (3) Line (16)		X	0.2100	=	
(059)	Guaranteed Low Income Housing Tax Credits	LR007 Real Estate Column (3) Line (17) + Line (19)		X	0.0000	=	
(060)	Non-Guaranteed and All Other Low Income Housing Tax Credits	LR007 Real Estate Column (3) Line (18) + Line (20) + Line (21)		X	0.0000	=	
(061)	Sch BA Real Estate Reduction - Reinsurance	LR007 Real Estate Column (3) Line (23)		X	0.2100	=	†
(062)	Sch BA Real Estate Increase - Reinsurance	LR007 Real Estate Column (3) Line (24)		X	0.2100	=	

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Denotes items that must be manually entered on the filing software.

CALCULATION OF TAX EFFECT FOR LIFE AND FRATERNAL RISK-BASED CAPITAL (CONTINUED)

		Source	(1) RBC Amount		Tax Factor		(2) RBC Tax Effect	
(063)	Sch BA Bond NAIC 1	LR008 Other Long-Term Assets Column (5) Line (2)		X	0.1575	=		
(064)	Sch BA Bond NAIC 2	LR008 Other Long-Term Assets Column (5) Line (3)		X	0.1575	=		
(065)	Sch BA Bond NAIC 3	LR008 Other Long-Term Assets Column (5) Line (4)		X	0.1575	=		
(066)	Sch BA Bond NAIC 4	LR008 Other Long-Term Assets Column (5) Line (5)		X	0.1575	=		
(067)	Sch BA Bond NAIC 5	LR008 Other Long-Term Assets Column (5) Line (6)		X	0.1575	=		
(068)	Sch BA Bond NAIC 6	LR008 Other Long-Term Assets Column (5) Line (7)		X	0.2100	=		
(069)	BA Bond Reduction - Reinsurance	LR008 Other Long-Term Assets Column (5) Line (9)		X	0.2100	=		†
(070)	BA Bond Increase - Reinsurance	LR008 Other Long-Term Assets Column (5) Line (10)		X	0.2100	=		
(071)	BA Preferred Stock NAIC 1	LR008 Other Long-Term Assets Column (5) Line (12.3)		X	0.1575	=		
(072)	BA Preferred Stock NAIC 2	LR008 Other Long-Term Assets Column (5) Line (13)		X	0.1575	=		
(073)	BA Preferred Stock NAIC 3	LR008 Other Long-Term Assets Column (5) Line (14)		X	0.1575	=		
(074)	BA Preferred Stock NAIC 4	LR008 Other Long-Term Assets Column (5) Line (15)		X	0.1575	=		
(075)	BA Preferred Stock NAIC 5	LR008 Other Long-Term Assets Column (5) Line (16)		X	0.1575	=		
(076)	BA Preferred Stock NAIC 6	LR008 Other Long-Term Assets Column (5) Line (17)		X	0.2100	=		
(077)	BA Preferred Stock Reduction-Reinsurance	LR008 Other Long-Term Assets Column (5) Line (19)		X	0.2100	=		†
(078)	BA Preferred Stock Increase - Reinsurance	LR008 Other Long-Term Assets Column (5) Line (20)		X	0.2100	=		
(079)	Rated Surplus Notes	LR008 Other Long-Term Assets Column (5) Line (31)		X	0.1575	=		
(080)	Rated Capital Notes	LR008 Other Long-Term Assets Column (5) Line (41)		X	0.1575	=		
(081)	BA Common Stock Affiliated	LR008 Other Long-Term Assets Column (5) Line (48.3)		X	0.2100	=		
(082)	BA Collateral Loans	LR008 Other Long-Term Assets Column (5) Line (50)		X	0.1575	=		
(083)	Other BA Assets	LR008 Other Long-Term Assets Column (5) Line (52.3) + LR018 Off-Balance Sheet Collateral Column (3) Line (17) + Line (18)		X	0.2100	=		
(084)	Other BA Assets Reduction-Reinsurance	LR008 Other Long-Term Assets Column (5) Line (54)		X	0.2100	=		†
(085)	Other BA Assets Increase - Reinsurance	LR008 Other Long-Term Assets Column (5) Line (55)		X	0.2100	=		
(086)	BA Mortgages - In Good Standing	LR009 Schedule BA Mortgages Column (6) Line (11)		X	0.1575	=		
(087)	BA Mortgages - 90 Days Overdue	LR009 Schedule BA Mortgages Column (6) Line (15)		X	0.1575	=		
(088)	BA Mortgages - In Process of Foreclosure	LR009 Schedule BA Mortgages Column (6) Line (19)		X	0.1575	=		
(089)	Reduction - Reinsurance	LR009 Schedule BA Mortgages Column (6) Line (21)		X	0.2100	=		†
(090)	Increase - Reinsurance	LR009 Schedule BA Mortgages Column (6) Line (22)		X	0.2100	=		
	Miscellaneous							
(091)	Asset Concentration Factor	LR010 Asset Concentration Factor Column (6) Line (68) Grand Total Page		X	0.1575	=		
(092)	Miscellaneous Assets	LR012 Miscellaneous Assets Column (2) Line (7)		X	0.1575	=		
(093)	Derivatives - Collateral and Exchange Traded	LR012 Miscellaneous Assets Column (2) Lines (8) + (9) + (10)		X	0.1575	=		
(094)	Derivatives NAIC 1	LR012 Miscellaneous Assets Column (2) Line (11)		X	0.1575	=		
(095)	Derivatives NAIC 2	LR012 Miscellaneous Assets Column (2) Line (12)		X	0.1575	=		
(096)	Derivatives NAIC 3	LR012 Miscellaneous Assets Column (2) Line (13)		X	0.1575	=		
(097)	Derivatives NAIC 4	LR012 Miscellaneous Assets Column (2) Line (14)		X	0.1575	=		
(098)	Derivatives NAIC 5	LR012 Miscellaneous Assets Column (2) Line (15)		X	0.1575	=		
(099)	Derivatives NAIC 6	LR012 Miscellaneous Assets Column (2) Line (16)		X	0.2100	=		
(100)	Miscellaneous Assets Reduction-Reinsurance	LR012 Miscellaneous Assets Column (2) Line (19)		X	0.2100	=		†
(101)	Miscellaneous Assets Increase-Reinsurance	LR012 Miscellaneous Assets Column (2) Line (20)		X	0.2100	=		

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CALCULATION OF TAX EFFECT FOR LIFE AND FRATERNAL RISK-BASED CAPITAL (CONTINUED)

		Source	(1) RBC Amount		Tax Factor		(2) RBC Tax Effect	
(102)	Replications	LR013 Replication (Synthetic Asset) Transactions and Mandatory Convertible Securities Column (7) Line (9999999)		X	0.1575	=		
(103)	Reinsurance	LR016 Reinsurance Column (4) Line (17)		X	0.2100	=		
(104)	Investment Affiliates	LR042 Summary for Affiliated Investments Column (4) Line (6)		X	0.2100	=		
(105)	Investment in Parent	LR042 Summary for Affiliated Investments Column (4) Line (10)		X	0.2100	=		
(106)	Other Affiliate: Property and Casualty Insurers not Subject to Risk-Based Capital	LR042 Summary for Affiliated Investments Column (4) Line (11)		X	0.2100	=		
(107)	Other Affiliate: Life Insurers not Subject to Risk-Based Capital	LR042 Summary for Affiliated Investments Column (4) Line (12)		X	0.2100	=		
(108)	Publicly Traded Insurance Affiliates	LR042 Summary for Affiliated Investments Column (4) Line (14)		X	0.2100	=		
(109)	Subtotal for C-1o Assets	Sum of Lines (001) through (108), Recognizing the Deduction of Lines (013), (014), (015), (036), (044), (049), (056), (061), (069), (077), (084), (089) and (100)						
	C-0 Affiliated Common Stock							
(110)	Off-Balance Sheet and Other Items	LR017 Off-Balance Sheet and Other Items Column (5) Line (27)		X	0.1575	=		
(111)	Off-Balance Sheet Items Reduction - Reinsurance	LR017 Off-Balance Sheet and Other Items Column (5) Line (28)		X	0.2100	=		†
(112)	Off-Balance Sheet Items Increase - Reinsurance	LR017 Off-Balance Sheet and Other Items Column (5) Line (29)		X	0.2100	=		
(113)	Affiliated US Property - Casualty Insurers Directly Owned	LR042 Summary for Affiliated Investments Column (4) Line (1)		X	0.2100	=		
(114)	Affiliated US Life Insurers Directly Owned	LR042 Summary for Affiliated Investments Column (4) Line (2)		X	0.2100	=		
(115)	Affiliated US Health Insurers Directly and Indirectly Owned	LR042 Summary for Affiliated Investments Column (4) Line (3)		X	0.2100	=		
(116)	Affiliated US Property - Casualty Insurers Indirectly Owned	LR042 Summary for Affiliated Investments Column (4) Line (4)		X	0.2100	=		
(117)	Affiliated US Life Insurers Indirectly Owned	LR042 Summary for Affiliated Investments Column (4) Line (5)		X	0.2100	=		
(118)	Affiliated Alien Life Insurers - Canadian	LR042 Summary for Affiliated Investments Column (4) Line (8)		X	0.2100	=		
(119)	Affiliated Alien Life Insurers - All Others	LR042 Summary for Affiliated Investments Column (4) Line (9)		X	0.0000	=		
(120)	Subtotal for C-0 Affiliated Common Stock	Lines (110)-(111)+(112)+(113)+(114)+(115)+(116)+(117)+(118)+(119)						
	Common Stock							
(121)	Unaffiliated Common Stock	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (25) + LR018 Off-Balance Sheet Collateral Column (3) Line (16)		X	0.2100	=		
(122)	Credit for Hedging - Common Stock	LR015 Hedged Asset Common Stock Schedule Column (10) Line (0299999)		X	0.2100	=		†
(123)	Stock Reduction - Reinsurance	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (27)		X	0.2100	=		†
(124)	Stock Increase - Reinsurance	LR005 Unaffiliated Preferred and Common Stock Column (5) Line (28)		X	0.2100	=		
(125)	BA Common Stock Unaffiliated	LR008 Other Long-Term Assets Column (5) Line (47)		X	0.2100	=		
(126)	BA Common Stock Affiliated - C-1cs	LR008 Other Long-Term Assets Column (5) Line (49.2)		X	0.2100	=		
(127)	Common Stock Concentration Factor	LR011 Common Stock Concentration Factor Column (6) Line (6)		X	0.2100	=		
(128)	NAIC 01 Working Capital Finance Notes	LR008 Other Long-Term Assets Column (5) Line (51.1)		X	0.1575	=		
(129)	NAIC 02 Working Capital Finance Notes	LR008 Other Long-Term Assets Column (5) Line (51.2)		X	0.1575	=		
(130)	Affiliated Preferred Stock and Common Stock - Holding Company in Excess of Indirect Subs	LR042 Summary for Affiliated Investments Column (4) Line (7)		X	0.2100	=		
(131)	Affiliated Preferred Stock and Common Stock - All Other	LR042 Summary for Affiliated Investments Column (4) Line (13)		X	0.2100	=		
(132)	Total for C-1cs Assets	Lines (121)-(122)-(123)+(124)+(125)+(126)+(127)+(128)+(129)+(130)+(131)						
	Insurance Risk							
(133)	Disability Income Premium	LR019 Health Premiums Column (2) Lines (21) through (27)		X	0.2100	=		

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CALCULATION OF TAX EFFECT FOR LIFE AND FRATERNAL RISK-BASED CAPITAL (CONTINUED)

		Source	(1) RBC Amount		Tax Factor		(2) RBC Tax Effect
(134)	Long-Term Care	LR019 Health Premiums Column (2) Line (28) + LR023 Long-Term Care Column (4) Line (7)		X	0.2100	=	
(135)	Life Insurance C-2 Risk	LR025 Life Insurance Column (2) Line (8)		X	0.2100	=	
(136)	Group Insurance C-2 Risk	LR025 Life Insurance Column (2) Lines (20) and (21)		X	0.2100	=	
(136b)	Longevity C-2 Risk	LRtbd Longevity Risk Column (2) Line (5)		X	0.2100	=	
(137)	Disability and Long-Term Care Health Claim Reserves	LR024 Health Claim Reserves Column (4) Line (9) + Line (15)		X	0.2100	=	
(138)	Premium Stabilization Credit	LR026 Premium Stabilization Reserves Column (2) Line (10)		X	0.0000	=	
(139)	Total C-2 Risk	L(133) + L(134) + L(137) + L(138) + Square Root of [(L(135) + L(136))^2 + L(136b)^2 + 2 * (TBD Correlation Factor) * (L(135) + L(136)) * L(136b)]					
(140)	Interest Rate Risk	LR027 Interest Rate Risk Column (3) Line (36)		X	0.2100	=	
(141)	Health Credit Risk	LR028 Health Credit Risk Column (2) Line (7)		X	0.0000	=	
(142)	Market Risk	LR027 Interest Rate Risk Column (3) Line (37)		X	0.2100	=	
(143)	Business Risk	LR029 Business Risk Column (2) Line (40)		X	0.2100	=	
(144)	Health Administrative Expenses	LR029 Business Risk Column (2) Line (57)		X	0.0000	=	
(145)	Total Tax Effect	Lines (109) + (120) + (132) + (139) + (140) + (141) + (142) + (143) + (144)					

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