

SERFF Tracking Number: OXFR-128303935 State: District of Columbia
 Filing Company: Celtic Insurance Company State Tracking Number:
 Company Tracking Number: CELINDDC2011RC
 TOI: MS06 Medicare Supplement - Other Sub-TOI: MS06.000 Medicare Supplement - Other
 Product Name: Refund Calculation
 Project Name/Number: Refund Calculation /

Rate Information

Rate data applies to filing.

Filing Method: SERFF
Rate Change Type: Neutral
Overall Percentage of Last Rate Revision: 0.000%
Effective Date of Last Rate Revision: 01/01/1900
Filing Method of Last Filing: SERFF

Company Rate Information

| Company Name: | Overall % Indicated Change: | Overall % Rate Impact: | Written Premium Change for this Program: | # of Policy Holders Affected for this Program: | Written Premium for this Program: | Maximum % Change (where required): | Minimum % Change (where required): |
|-----------------------------|-----------------------------------|---------------------------|---|---|---|--|--|
| Celtic Insurance Company | 0.000% | 0.000% | \$0 | 0 | \$0 | 0.000% | 0.000% |

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Rate/Rule Schedule

| Schedule Item Status: | Document Name: | Affected Form Numbers: (Separated with commas) | Rate Action: | Rate Action Information: | Attachments |
|-----------------------|--------------------|---|--------------|--------------------------|--|
| | Refund Calculation | MS POL I | New | | Celtic DC 2011 Refund Calculation.pdf Celtic Refund Calc Letter 1.pdf Celtic Authorization Letter 2012.pdf |

REPORTING FORM FOR THE CALCULATION OF BENCHMARK RATIO SINCE INCEPTION
FOR INDIVIDUAL POLICIES FOR CALENDAR YEAR 2011

TYPE: Individual SMSBP(p): I
 For the State of: District of Columbia
 Company Name: Celtic Insurance Company NAIC Group Code: 270
 Address: 233 South Wacker Drive Suite 700 NAIC Company Code: 80799
 City, State, Zip-Code: Chicago, Illinois 60606
 Person Completing This Exhibit: Ryan MacTough Telephone Number: (602) 263-6666
 Title: Actuarial Analyst

| Year | Earned Premium | Factor | Cumulative Earned Premiums | Cumulative Loss Ratio | Cumulative Incurred Claims | Factor | Cumulative Earned Premiums | Cumulative Loss Ratio | Cumulative Incurred Claims | Policy Year |
|--------|----------------|--------|----------------------------|-----------------------|----------------------------|--------|----------------------------|-----------------------|----------------------------|-------------|
| 1 | - | 2.770 | - | 0.442 | - | 0.000 | - | 0.000 | - | 0.400 |
| 2 | - | 4.175 | - | 0.493 | - | 0.000 | - | 0.000 | - | 0.550 |
| 3 | - | 4.175 | - | 0.493 | - | 1.194 | - | 0.659 | - | 0.650 |
| 4 | - | 4.175 | - | 0.493 | - | 2.245 | - | 0.669 | - | 0.670 |
| 5 | - | 4.175 | - | 0.493 | - | 3.170 | - | 0.678 | - | 0.690 |
| 6 | - | 4.175 | - | 0.493 | - | 3.998 | - | 0.686 | - | 0.710 |
| 7 | - | 4.175 | - | 0.493 | - | 4.754 | - | 0.695 | - | 0.730 |
| 8 | - | 4.175 | - | 0.493 | - | 5.445 | - | 0.702 | - | 0.750 |
| 9 | - | 4.175 | - | 0.493 | - | 6.075 | - | 0.708 | - | 0.760 |
| 10 | - | 4.175 | - | 0.493 | - | 6.650 | - | 0.713 | - | 0.760 |
| 11 | - | 4.175 | - | 0.493 | - | 7.176 | - | 0.717 | - | 0.760 |
| 12 | - | 4.175 | - | 0.493 | - | 7.655 | - | 0.720 | - | 0.770 |
| 13 | 391 | 4.175 | 1,632 | 0.493 | 805 | 8.093 | 3,164 | 0.723 | 2,288 | 0.770 |
| 14 | 1,395 | 4.175 | 5,824 | 0.493 | 2,871 | 8.493 | 11,848 | 0.725 | 8,590 | 0.770 |
| 15 | 1,395 | 4.175 | 5,824 | 0.493 | 2,871 | 8.684 | 12,114 | 0.725 | 8,783 | 0.770 |
| Total: | \$3,181 | | \$13,281 | | \$6,547 | | \$27,126 | | \$19,660 | |

Benchmark Ratio Since Inception 0.649

MEDICARE SUPPLEMENT REFUND CALCULATION FORM
FOR CALENDAR YEAR 2011

| | | | |
|---------------------------------|---|--------------------|-----------------------|
| TYPE: | <u>Individual</u> | SMSBP(p): | <u>I</u> |
| For the State of: | <u>Disrict of Columbia</u> | NAIC Group Code: | <u>270</u> |
| Company Name: | <u>Celtic Insurance Company</u> | NAIC Company Code: | <u>80799</u> |
| Address: | <u>233 South Wacker Drive Suite 700</u> | Telephone Number: | <u>(602) 263-6666</u> |
| City, State, Zip-Code: | <u>Chicago, Illinois 60606</u> | | |
| Person Completing This Exhibit: | <u>Ryan MacTough</u> | | |
| Title: | <u>Actuarial Analyst</u> | | |

| | Earned Premium | Incurred Claims |
|---|----------------------|---|
| 1. Current Year's Experience | | |
| a. Total (all policy years) | \$8,706 | \$1,754 |
| b. Current year's issues | \$0 | \$0 |
| c. Net (1a-1b) | \$8,706 | \$1,754 |
| 2. Past Year's Experience (All policy years) | \$74,419 | \$16,762 |
| 3. Total Experience (1c+2) | \$83,125 | \$18,516 |
| 4. Refunds Last Year (excluding interest) | \$0 | |
| 5. Previous Since Inception (excluding interest) | \$0 | |
| 6. Refunds Since Inception (excluding interest) | \$0 | |
| 7. Benchmark Ratio Since Inception (Ratio 1) | 0.649 | |
| 8. Experience Ratio Since Inception (Ratio 2) | 0.223 | |
| 9. Life Years Exposed Since Inception | 16 | |
| 10. Tolerance Permitted (from credibility table) | Not credible. | |
| 11. Adjustment to Incurred Claims for Credibility | Not credible. | |
| 12. Adjusted Incurred Claims | Refund not required. | |
| 13. Refund | \$0 | The refund is only paid if it exceeds the De Minimus Amount. The distribution methodology must be filed also. |
| De Minimus Amount | \$44 | |
| .005 x Annualized Premium IF Dec. 31, 2011 | | |

Medicare Supplement Credibility Table

| Life Years Exposed Since Inception | Tolerance |
|---------------------------------------|-----------|
| 10,000+ | 0.00% |
| 5,000-9,999 | 5.00% |
| 2,500-4,999 | 7.50% |
| 1,000-2,499 | 10.00% |
| 500-999 | 15.00% |

If less than 500, no credibility.

I certify that the above information and calculations are true and accurate to the best of my knowledge and belief.

Signature



Name: Robert Simmons, ASA, MAAA

Title: Chief Actuary

Oxford Life Insurance Company

Date 02/28/12

February 3, 2012

Department of Insurance and Securities Regulation
Government of the District of Columbia
810 First Street, N.E. #701
Washington, D.C. 20002

Re: Medicare Supplement Individual Reporting Form – 2011
Celtic Insurance Company
NAIC: 80799; FEIN: 06-0641618

To Whom It May Concern:

Oxford Life Insurance Company, on behalf of Celtic Insurance Company, is submitting the following report for your review. Enclosed please find the Refund Calculation Form and the Benchmark Ratio Reporting Form for Medicare Supplement business for the calendar year 2011.

If you have any questions, please contact me.

Sincerely,

Ryan MacTough
Actuarial Analyst
888-757-3732, extension 670127
ryanmactough@oxfordlife.com.

Sears Tower
233 South Wacker Drive, Suite 700
Chicago, Illinois 60606-6393
312-332-5401

April 24, 2012

TO: Department of Insurance

RE: Rate and/or Form Filings

NAIC# 80799

Please be advised Celtic Insurance Company, Chicago, Illinois authorizes:

Oxford Life Insurance Company
2721 N. Central Avenue
Phoenix, Arizona 85004-1172

To file the enclosed rates and/or forms on behalf of Celtic Insurance Company.

For inquiries regarding the enclosed filings please contact Oxford Life Insurance Company at (877) 667-9368.

Sincerely,



Michele O'Doherty
Vice-President, Compliance
Celtic Insurance Company
(312) 332-8546- direct line
modoherty@celtic-net.com

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Filing Company: Celtic Insurance Company

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Sub-TOI: MS06.000 Medicare Supplement - Other

Product Name: Refund Calculation

Project Name/Number: Refund Calculation /

Supporting Document Schedules

Item Status:

Status

Date:

Bypassed - Item: Actuarial Justification

Bypass Reason: Refund Calculation only.

Comments: