

State: Arkansas **Filing Company:** Northwestern Long Term Care Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: 90-2486 LTC (0113)
Project Name/Number: 90-2486 LTC (0113)/90-2486 LTC (0113)

Filing at a Glance

Company: Northwestern Long Term Care Insurance Company
Product Name: 90-2486 LTC (0113)
State: Arkansas
TOI: LTC03I Individual Long Term Care
Sub-TOI: LTC03I.001 Qualified
Filing Type: Advertisement
Date Submitted: 12/07/2012
SERFF Tr Num: NWST-128764381
SERFF Status: Closed-Approved
State Tr Num:
State Status: Approved-Closed
Co Tr Num: 90-2486 LTC (0113)

Implementation: On Approval
Date Requested:
Author(s): Cassandra Hoefke, Lisa Kucik
Reviewer(s): Donna Lambert (primary)
Disposition Date: 12/18/2012
Disposition Status: Approved
Implementation Date:

State Filing Description:

State: Arkansas **Filing Company:** Northwestern Long Term Care Insurance Company
TOI/Sub-TOI: LTC031 Individual Long Term Care/LTC031.001 Qualified
Product Name: 90-2486 LTC (0113)
Project Name/Number: 90-2486 LTC (0113)/90-2486 LTC (0113)

General Information

Project Name: 90-2486 LTC (0113) Status of Filing in Domicile: Pending
 Project Number: 90-2486 LTC (0113) Date Approved in Domicile:
 Requested Filing Mode: Review & Approval Domicile Status Comments:
 Explanation for Combination/Other: Market Type: Individual
 Submission Type: New Submission Individual Market Type:
 Overall Rate Impact: Filing Status Changed: 12/18/2012
 State Status Changed: 12/18/2012
 Deemer Date: Created By: Cassandra Hoefke
 Submitted By: Cassandra Hoefke Corresponding Filing Tracking Number:

Filing Description:

We are submitting the attached forms for your review and approval, if necessary, as advertising material for the Long-Term Care Policy and related forms which have been previously approved in your state. These forms are being submitted on behalf of Northwestern Long Term Care Insurance Company, a wholly owned subsidiary of The Northwestern Mutual Life Insurance Company.

The forms included with this filing are intended for use by our agents to provide to clients and prospects regarding long-term care insurance.

Based on the above, your review and approval would be greatly appreciated. If you should have any questions regarding the enclosed forms, you may call me at (414) 665-2862 or you can e-mail me at lisakucik@northwesternmutual.com. For email correspondence, please copy Cassandra Hoefke at cassandrahoefke@northwesternmutual.com.

Sincerely,
 Lisa Kucik
 Product Compliance Specialist
 Actuarial Department

Company and Contact

Filing Contact Information

Lisa Kucik, Product Compliance Specialist lisakucik@northwesternmutual.com
 720 East Wisconsin Avenue 414-665-2862 [Phone]
 Milwaukee, WI 53202-4797 414-665-5006 [FAX]

Filing Company Information

Northwestern Long Term Care Insurance Company	CoCode: 69000	State of Domicile: Wisconsin
720 East Wisconsin Avenue	Group Code: 860	Company Type: Long Term Care
Rm S845	Group Name:	State ID Number:
Milwaukee, WI 53202	FEIN Number: 36-2258318	
(414) 271-1444 ext. [Phone]		

Filing Fees

State: Arkansas **Filing Company:** Northwestern Long Term Care Insurance Company
TOI/Sub-TOI: LTC031 Individual Long Term Care/LTC031.001 Qualified
Product Name: 90-2486 LTC (0113)
Project Name/Number: 90-2486 LTC (0113)/90-2486 LTC (0113)

Fee Required? Yes
Fee Amount: \$100.00
Retaliatory? No
Fee Explanation: \$50.00 per Advertising Form; 2 forms are attached = \$100.00.
Per Company: No

Company	Amount	Date Processed	Transaction #
Northwestern Long Term Care Insurance Company	\$100.00	12/07/2012	65542376

SERFF Tracking #:

NWST-128764381

State Tracking #:**Company Tracking #:**

90-2486 LTC (0113)

State:

Arkansas

Filing Company:

Northwestern Long Term Care Insurance Company

TOI/Sub-TOI:

LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name:

90-2486 LTC (0113)

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90-2486 LTC (0113)/90-2486 LTC (0113)

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Donna Lambert	12/18/2012	12/18/2012

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Pending Industry Response	Donna Lambert	12/10/2012	12/10/2012
Pending Industry Response	Donna Lambert	12/10/2012	12/10/2012

Response Letters

Responded By	Created On	Date Submitted
Lisa Kucik	12/17/2012	12/17/2012

SERFF Tracking #:

NWST-128764381

State Tracking #:**Company Tracking #:**

90-2486 LTC (0113)

State:

Arkansas

Filing Company:

Northwestern Long Term Care Insurance Company

TOI/Sub-TOI:

LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name:

90-2486 LTC (0113)

Project Name/Number:

90-2486 LTC (0113)/90-2486 LTC (0113)

Disposition

Disposition Date: 12/18/2012

Implementation Date:

Status: Approved

Comment:

Rate data does NOT apply to filing.

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document (revised)	Statement of Variability	Approved	Yes
Supporting Document	Statement of Variability	Replaced	Yes
Form (revised)	LTC Building on a Strong Reputation	Approved	Yes
Form	LTC Building on a Strong Reputation	Replaced	Yes
Form	VALUE your resources: Multilife Discount Program	Approved	Yes

State: Arkansas **Filing Company:** Northwestern Long Term Care Insurance Company
TOI/Sub-TOI: LTC031 Individual Long Term Care/LTC031.001 Qualified
Product Name: 90-2486 LTC (0113)
Project Name/Number: 90-2486 LTC (0113)/90-2486 LTC (0113)

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	12/10/2012
Submitted Date	12/10/2012
Respond By Date	01/10/2013

Dear Lisa Kucik,

Introduction:

Please respond to the following objections..

Objection 1

- VALUE your resources: Multilife Discount Program, 90-2487 LTC (0113) (Form)

Comments: This form has been filed under LTC031 which is Individual Long Term Care. This piece appears to be a group advertising form. Please explain. Thank you.

Objection 2

- LTC Building on a Strong Reputation, 90-2486 LTC (0113) (Form)

Comments: Industry Evolution - Guideline 11 (A) of RR 18 prohibits the use of statistics that are misleading and deceptive. There is no explanation as to why the companies no longer sell long-term care insurance, and they are not obligated to continue selling LTC insurance once they begin. The statements in your advertising piece imply a negative reason for their discontinuing selling LTC insurance, which may or may not be the case.

Further, Section 13 of RR 18 does not allow directly or indirectly the unfair or incomplete comparisons of policies or benefits or comparisons of non-comparable policies of other insurers. There is not indication that the policies sold by other carriers are substantially similar to the policy your advertising refers to other than they provide some type of long term care benefit.

Please remove or revise this section.

Conclusion:

A.C.A. 23-79-109(1)-(5) sets forth the procedure by which filings may be deemed approved upon the expiration of certain time periods with no affirmative action by the commissioner. If the commissioner determines that additional information is needed to make a decision regarding approval, such request for information will be made to the company. The filing will not be considered complete until said additional information is received. The time periods set forth in this statute will not begin to run until the filing is complete.

Please feel free to contact me if you have questions.

Sincerely,

Donna Lambert

State: Arkansas **Filing Company:** Northwestern Long Term Care Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: 90-2486 LTC (0113)
Project Name/Number: 90-2486 LTC (0113)/90-2486 LTC (0113)

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	12/10/2012
Submitted Date	12/10/2012
Respond By Date	01/10/2013

Dear Lisa Kucik,

Introduction:

This will acknowledge receipt of the captioned filing.

Conclusion:

A.C.A. 23-79-109(1)-(5) sets forth the procedure by which filings may be deemed approved upon the expiration of certain time periods with no affirmative action by the commissioner. If the commissioner determines that additional information is needed to make a decision regarding approval, such request for information will be made to the company. The filing will not be considered complete until said additional information is received. The time periods set forth in this statute will not begin to run until the filing is complete.

Please feel free to contact me if you have questions.

Sincerely,

Donna Lambert

State: Arkansas
TOI/Sub-TOI: LTC031 Individual Long Term Care/LTC031.001 Qualified
Product Name: 90-2486 LTC (0113)
Project Name/Number: 90-2486 LTC (0113)/90-2486 LTC (0113)

Filing Company: Northwestern Long Term Care Insurance Company

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	12/17/2012
Submitted Date	12/17/2012

Dear Donna Lambert,

Introduction:

Response 1

Comments:

All policies are individually underwritten and are issued as individual policies to employees in an employer sponsored market.

Related Objection 1

Applies To:

- VALUE your resources: Multilife Discount Program, 90-2487 LTC (0113) (Form)

Comments: This form has been filed under LTC031 which is Individual Long Term Care. This piece appears to be a group advertising form. Please explain. Thank you.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Response 2

Comments:

We have revised this section to say, Northwestern Long Term Care Insurance Company began issuing long-term care insurance in 1998. The following comparison based on new premium sales of individual long-term care insurance reflects how this market has changed over time.

Related Objection 2

Applies To:

- LTC Building on a Strong Reputation, 90-2486 LTC (0113) (Form)

SERFF Tracking #:

NWST-128764381

State Tracking #:

Company Tracking #:

90-2486 LTC (0113)

State:

Arkansas

Filing Company:

Northwestern Long Term Care Insurance Company

TOI/Sub-TOI:

LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name:

90-2486 LTC (0113)

Project Name/Number:

90-2486 LTC (0113)/90-2486 LTC (0113)

Comments: Industry Evolution - Guideline 11 (A) of RR 18 prohibits the use of statistics that are misleading and deceptive. There is no explanation as to why the companies no longer sell long-term care insurance, and they are not obligated to continue selling LTC insurance once they begin. The statements in your advertising piece imply a negative reason for their discontinuing selling LTC insurance, which may or may not be the case.

Further, Section 13 of RR 18 does not allow directly or indirectly the unfair or incomplete comparisons of policies or benefits or comparisons of non-comparable policies of other insurers. There is not indication that the policies sold by other carriers are substantially similar to the policy your advertising refers to other than they provide some type of long term care benefit.

Please remove or revise this section.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Statement of Variability
Comments:	
Attachment(s):	
1 SOV 90-2487 LTC (0113).pdf 1 SOV 90-2486 LTC (0113).pdf	
<i>Previous Version</i>	
Satisfied - Item:	Statement of Variability
Comments:	
Attachment(s):	
1 SOV 90-2486 LTC (0113).pdf 1 SOV 90-2487 LTC (0113).pdf	

SERFF Tracking #:

NWST-128764381

State Tracking #:

Company Tracking #:

90-2486 LTC (0113)

State: Arkansas

Filing Company:

Northwestern Long Term Care Insurance Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name: 90-2486 LTC (0113)

Project Name/Number: 90-2486 LTC (0113)/90-2486 LTC (0113)

Form Schedule Item Changes:

Form Schedule Item Changes								
Item No.	Form Name	Form Number	Form Type	Form Action	Action Specific Data	Readability Score	Attachments	Submitted
1	LTC Building on a Strong Reputation	90-2486 LTC (0113)	ADV	Initial		0.000	90-2486 LTC (0113) 12142012.pdf	Date Submitted: 12/17/2012 By: Lisa Kucik
<i>Previous Version</i>								
1	<i>LTC Building on a Strong Reputation</i>	<i>90-2486 LTC (0113)</i>	<i>ADV</i>	<i>Initial</i>		<i>0.000</i>	<i>90-2486 LTC (0113).pdf</i>	<i>Date Submitted: 12/07/2012 By: Cassandra Hoefke</i>

No Rate/Rule Schedule items changed.

Conclusion:

Based on the above your continued review and approval is greatly appreciated. Should you have questions, please contact me at 414-665-2862 or by email at lisakucik@northwesternmutual.com. For all email correspondence please copy Cassandra Hoefke at cassandrahoefke@northwesternmutual.com.

Sincerely,

Lisa Kucik

State: Arkansas
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: 90-2486 LTC (0113)
Project Name/Number: 90-2486 LTC (0113)/90-2486 LTC (0113)

Filing Company: Northwestern Long Term Care Insurance Company

Form Schedule

Lead Form Number: 90-2486 LTC (0113)

Item No.	Schedule Item Status	Form Name	Form Number	Form Type	Form Action	Action Specific Data	Readability Score	Attachments
1	Approved 12/18/2012	LTC Building on a Strong Reputation	90-2486 LTC (0113)	ADV	Initial		0.000	90-2486 LTC (0113) 12142012.pdf
2	Approved 12/18/2012	VALUE your resources: Multilife Discount Program	90-2487 LTC (0113)	ADV	Initial		0.000	90-2487 LTC (0113).pdf

Form Type Legend:

ADV	Advertising	AEF	Application/Enrollment Form
CER	Certificate	CERA	Certificate Amendment, Insert Page, Endorsement or Rider
DDP	Data/Declaration Pages	FND	Funding Agreement (Annuity, Individual and Group)
MTX	Matrix	NOC	Notice of Coverage
OTH	Other	OUT	Outline of Coverage
PJK	Policy Jacket	POL	Policy/Contract/Fraternal Certificate
POLA	Policy/Contract/Fraternal Certificate: Amendment, Insert Page, Endorsement or Rider	SCH	Schedule Pages



STRENGTH

Building on a Strong Reputation

*What makes
Northwestern Long
Term Care Insurance
Company stand out
from other long-term
care insurers?*

NORTHWESTERN LONG TERM CARE INSURANCE COMPANY:

- Is a wholly owned subsidiary of The Northwestern Mutual Life Insurance Company. [The company was named “World’s Most Admired” life insurance company by FORTUNE® magazine.]¹
- Has always maintained unsurpassed financial strength ratings from the four major rating services.
- Has over [137,000] long-term care policies in force totaling in excess of [\$314 million] in issued premium.²
- Has a history of offering new policy features to existing policyowners whenever possible and practical.³
- Offers a participating long-term care insurance policy, and announced a [\$12.8 million dividend for 2012].⁴

Northwestern Long Term Care Insurance Company ratings⁵

[A++ Highest Rating

A.M. Best Company
April 2012]

[AAA Highest Rating

Fitch Ratings
June 2012]

[AA+ Second Highest Rating

Standard & Poor’s
June 2012]

[Aaa Highest Rating

Moody’s Investors Service
October 2011]

Ratings are subject to change.

¹ [March 2, 2012 issue, FORTUNE® magazine survey.]

² Northwestern Long Term Care Insurance Company data as of [July 2011].

³ QuietCare®RR Series policyowners were sent a Benefit Upgrade offer in 2002. This offer included an amendment making their policies participating (eligible to receive dividends if warranted), and an offer to increase their Assisted Living Facility Maximum Daily Limit from 75% to 100% of Nursing Home Maximum Daily Limit and to include Caregiver Training Benefit. All of these enhancements were offered to policyowners at no additional charge. NLTC policyowners automatically received the Participation Amendment, but were required to sign and return the Benefit Upgrade Acceptance Form to the NLTC Administration Office in order to receive the Benefit Upgrade Amendment.

⁴ Neither the existence nor the amount of a dividend is guaranteed in any given year. Decisions with respect to the determination and allocation of divisible surplus are left to the discretion and sound business judgment of the Board of Directors. There is no guaranteed specific method or formula for the determination and allocation of divisible surplus. Northwestern Long Term Care Insurance Company’s approach is subject to change.

⁵ Ratings are for Northwestern Mutual Life Insurance Company and Northwestern Long Term Care Insurance Company, as of the most recent review and report by each rating agency. Northwestern Mutual’s ratings: [Moody’s Investors Service Aaa (highest), 10/2011; A.M. Best Company A++ (highest), 4/2012; Fitch Ratings AAA (highest), 6/2012; Standard & Poor’s AA+ (second highest), 6/2012.] These rating agencies are not government regulated agencies. Ratings are subject to change.

Northwestern Long Term Care Insurance Company
A subsidiary of the Northwestern Mutual Life
Insurance Company • Milwaukee, WI
www.northwesternmutual.com

 **Northwestern Long Term Care
Insurance Company™**

A Northwestern Mutual Company

INDUSTRY EVOLUTION

Northwestern Long Term Care Insurance Company began issuing long-term care insurance in 1998. The following comparison based on new premium sales of individual long-term care insurance reflects how this market has changed over time.

[2000] Top Ten Writers of Long-Term Care Insurance*	[2011] Top Ten Writers of Long-Term Care Insurance*
[Aegon]	[Bankers Life & Casualty]
[CNA Insurance]	[Genworth (formerly AMEX & GE)]
[Conseco]	[John Hancock (Manulife)]
[Fortis]	[Massachusetts Mutual]
[GE Capital]	[Mutual of Omaha]
[IDS Life]	[New York Life]
[John Hancock]	[Northwestern Long Term Care Insurance Company]
[Penn Treaty]	[Prudential]
[State Farm]	[State Farm Mutual Automobile]
[UNUM]	[Transamerica Long Term Care]

* In alphabetical order as reported by LIMRA International in [2011].

Examples of companies that have discontinued selling long-term care insurance since 1996

- AAL (Aid Association for Lutherans/ Thrivent Financial for Lutherans)
- Aetna
- Allianz
- AMEX
- Bankers United, Life Investors, Monumental Life
- Berkshire Life
- CNA (Individual)
- Conseco Senior Health
- CUNA Mutual
- Equitable Life & Casualty
- Fortis/Time
- Guarantee Trust Life
- IDS Life
- Lincoln Benefit
- MetLife
- Mutual Protective/Medico
- Penn Treaty
- Pioneer Life
- TIAA Cref
- Transport Life
- The Travelers

In Texas, a prospective insured may contact the Health Information Counseling and Advocacy Program (HICAP), 701 W. 51st W-352, Austin, Texas, 78751, at 1-800-252-9240 to receive counseling regarding the purchase of long-term care or other health care coverage. This program is a senior insurance counseling program provided by the Area Agency on Aging under the authority of the Texas Health and Human Services commission. A financial representative (licensed insurance agent) will contact you.

Your state's insurance department may have additional information, including a buyer's guide, explaining long-term care insurance. This long-term care insurance policy contains exclusions and limitations. For costs and complete details, please contact your financial representative (licensed insurance agent).

This material is produced for the marketing and solicitation of insurance. This policy includes exclusions and limitations. For costs and further details of the coverage, including exclusions, any reductions or limitations and terms under which the policy may be continued in force, see your licensed insurance agent/producer or write to the company. A financial representative (a licensed insurance agent/producer) may contact you.

Long-Term Care Insurance Policy forms TT.LTC.(1010) and TT.LTC.(0213). Form numbers may vary by state.

Long-Term Care Insurance Policy forms TT.LTC.ML.(1010) and TT.LTC.ML.(0213) are only available in New Jersey, New York, Ohio, and Pennsylvania.

Long-Term Care Insurance Policy form TT.LTC.LP.(0213) is only available in Texas.

Long-Term Care Insurance Policy form TT.LTCN.(0213) is only available in Massachusetts.

Northwestern Long Term Care Insurance Company
A subsidiary of the Northwestern Mutual Life Insurance Company • Milwaukee, WI
www.northwesternmutual.com

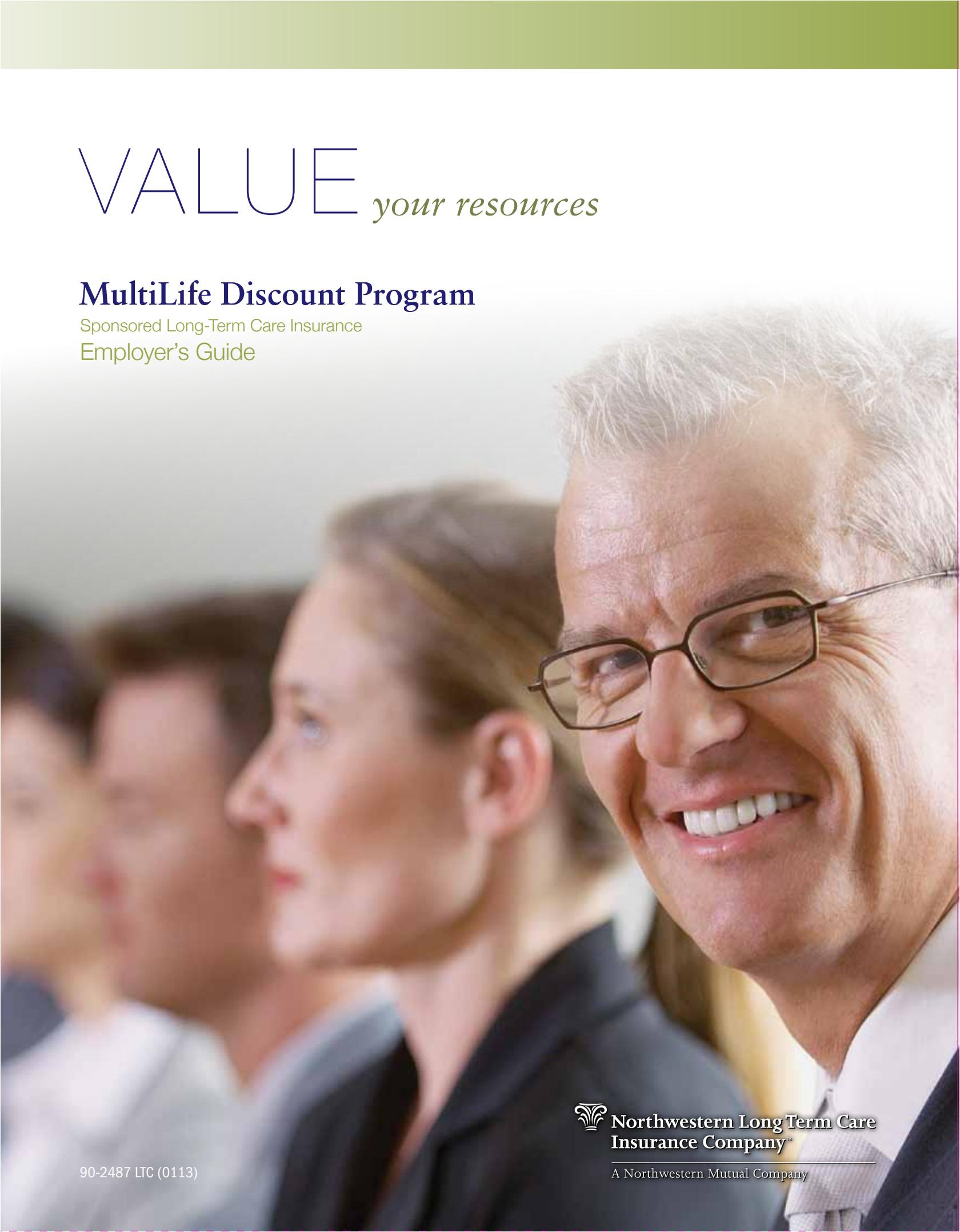
 **Northwestern Long Term Care Insurance Company™**

A Northwestern Mutual Company

VALUE *your resources*

MultiLife Discount Program

Sponsored Long-Term Care Insurance
Employer's Guide



 Northwestern Long Term Care
Insurance Company™

A Northwestern Mutual Company

IMPACT *on your employees and your business*

Are your employees and their families dealing with long-term care issues today?

Your Employees are Your Business

In order to protect your business, you need to take care of your employees.

Most companies couldn't succeed without their employees. Like many businesses that compete for employees as well as customers, you want to protect your most valuable resources.

Employee Benefit Solutions

One effective way to attract, retain and protect employees is with a comprehensive employee benefit package.

What benefits are you currently offering to attract and retain quality employees?

- Health insurance
- Life insurance
- Disability income insurance
- Retirement and savings plans

How does your benefits package address your challenges?

- Long-term soundness and stability
- Rewards and incentives for employees at all levels
- Value for recruiting and retention

Potential Impact of Long-Term Care

Long-term care encompasses services provided to individuals suffering from a chronic illness, disabling condition or cognitive impairment. **Services may be provided in the home, in your community, in an alternate living facility or in a nursing home.**

Long-term care can be a family concern. It presents physical and emotional challenges for your employees, and their families, that can affect their attendance and productivity at work.

Northwestern Long Term Care Insurance Company (Northwestern LTC) has an opportunity to help you and your business to:

- Recognize, reward and protect your valued employees and their families
- Protect you, and your family members
- Help attract and retain quality employees
- Differentiate your employee benefits program from competitors
- Offer potential tax advantages to your business
- Provide a cutting edge benefit, while enabling caregivers to continue working

SIMPLE *protection for your business*

The MultiLife Discount Program

- Only 3 W-2 employees to qualify
- [5%] Discount¹ for:
 - Employees and their spouses
 - Employee's parents, parents-in-law
 - Retirees, and the retiree's spouse
 - Applies regardless of whether the employer is paying all, part or none of the premium
 - [A 30 percent spousal discount may be leveraged with the 5% MultiLife discount]²

Employees who already own Northwestern LTC insurance policies may help you to meet the three-participant minimum.

Effective Communication

Effective communication to your employees regarding the value of a long-term care insurance program is essential to its success. Northwestern LTC can provide various resources to help you market long-term care insurance to your employees:

- Workplace marketing and promotion
- Letters, brochures, payroll stuffers, table tents
- Intranet and newsletter articles
- Employee education presentations
- E-mail templates

Additional benefits of MultiLife Long-Term Care Insurance

- Companies can choose to pay part, or all, of the premium for employees who meet a certain criteria. This is one of the few health-care-related benefit programs that can be offered on a discretionary basis.
- All policies are underwritten individually and are issued as individual policies to employees. Employees may take their coverage with them if they retire or leave the company. Participants who leave the employer and keep their policy in force will retain eligibility for the MultiLife premium discount.

¹ Policies issued in New Jersey, New York, Ohio and Pennsylvania with the MultiLife Discount have the form number TT.LTC.ML(1010). In New York, employer may not pay more than 50% of the premium.

² When spouses apply together and both policies are approved. If you qualify for a QuietCare® long-term care insurance policy, but your spouse does not, you are still eligible for a [15%] spousal discount. In Montana, discounts based on marital status are not available. A caregiver discount is available in Montana only. Please see your network representative for more information. Discount may be applied when both spouses apply for and are issued policies.

Tax Advantages³

Many people don't realize that tax-qualified long-term care benefits paid to an insured under a policy claim are generally **received tax free**.

A company that pays for some or all of its employees' premiums can generally deduct all or a portion of the premiums it pays for these tax-qualified policies, depending on how the business is structured.⁴

Maximum Eligible Premium in [2011] indexed for inflation annually Self-employed deductibility guidelines

[Age]	[Amount]
[40 or less]	[\$340]
[41 – 50]	[\$640]
[51 – 60]	[\$1,270]
[61 – 70]	[\$3,390]
[71 and older]	[\$4,240]

	S-Corp, LLC, partnership or sole proprietor	C-Corp
Owners⁵	Eligible, age-based premium may be withdrawn tax-free from a Health Savings Account (HSA). Premiums paid using non-HSA funds must be included in income and then deducted according to age-based limitations.	The company can deduct the premium. The owner, if participating in the plan as an employee, does not have to include the premium as part of income.
Employees where the company pays the premium	The employer can deduct the premium. The employee does not have to include the premium as part of income. Premiums are deductible for spouses who are not employees.	The company can deduct the premium. The employee does not have to include the premium as part of income. Premiums are deductible for spouses who are not employees.

³ This information does not include legal or tax advice and is not intended to be and cannot be used to avoid any penalties under the federal tax law. You should always seek tax advice regarding your particular circumstances from an independent tax advisor.

⁴ The Employee Retirement Income Security Act of 1974 imposes additional requirements on certain employer-sponsored insurance plans. Individuals paying their own premiums for tax-qualified long-term care insurance may deduct those premiums, subject to the above age-based limitations on amount, to the extent that their premiums and other unreimbursed medical expenses exceed 7.5 percent of their adjusted gross income.

⁵ Two percent or more shareholders.

TRUST

Why Northwestern LTC?

Northwestern LTC is a wholly owned subsidiary of The Northwestern Mutual Life Insurance Company. Northwestern Mutual is among the “World’s Most Admired” life insurance companies according to executives, directors and analysts in FORTUNE® magazine’s [2012] annual survey.⁶

Industry Evolution

Of the top ten companies selling long-term care insurance in 1998, many are no longer selling long-term care insurance today and few are of the same ownership.

Northwestern Long Term Care Insurance Company began issuing long-term care insurance in 1998 only after closely examining the long-term care insurance marketplace, and we have quickly moved into the top ten companies for newly issued business while pricing to promote long-term stability.

Our Commitment

- **Values of mutuality** – We make decisions based on the best long-term interest of policyowners guided by the principle of equitable treatment for all, and building long-term relationships to meet their needs.
- **Financial strength** – We have unsurpassed industry financial strength ratings from all four major industry ratings services.
- **Flexibility in plan design** – We offer the ability to customize the plan design and individual insurance policies to meet your specific needs.
- **Claims handling** – It is Northwestern LTC’s philosophy to pay claims promptly, fairly and accurately, compatible with Northwestern’s principle of fairness to all customers.
- **Policy participation** – Offers a participating long-term care insurance policy, and announced a [\$12.8] million dividend for [2012].⁷

STABILITY

Recognized Financial Strength⁸

Financial strength is fundamental to Northwestern Long Term Care Insurance Company's vision for policyowners. Northwestern Long Term Care Insurance Company, a wholly owned subsidiary of The Northwestern Mutual Life Insurance Company, has unsurpassed industry financial strength ratings from all four major rating services (see chart below).

These third-party ratings provide a professional assessment of our strength and security and represent our promise to pay our claims and meet our obligations. Additionally, benefits of Northwestern Long Term Care Company are 100 percent guaranteed by Northwestern Mutual.

Northwestern Long Term Care Insurance Company ratings⁹

[A++ Highest Rating]
A.M. Best Company
April 2012

[AAA Highest Rating]
Fitch Ratings
June 2012

[Aaa Highest Rating]
Moody's Investors Service
October 2011

[AA+ Second Highest Rating]
Standard & Poor's
June 2012

Ratings are subject to change.

⁶ [FORTUNE® magazine, March 2, 2012.]

⁷ Neither the existence nor the amount of a dividend is guaranteed in any given year. Decisions with respect to the determination and allocation of divisible surplus are left to the discretion and sound business judgment of the Board of Directors. There is no guaranteed specific method or formula for the determination and allocation of divisible surplus. Northwestern Long Term Care Insurance Company's approach is subject to change.

⁸ Ratings are for Northwestern Mutual Life Insurance Company and Northwestern Long Term Care Insurance Company, as of the most recent review and report by each rating agency. Northwestern Mutual's ratings: [Moody's Investors Service Aaa (highest), 10/2011; A.M. Best Company A++ (highest), 4/2012; Fitch Ratings AAA (highest), 6/2012; Standard & Poor's AA+ (second highest), 6/2012.] Ratings are subject to change.

The prospective insured may contact the Health Information Counseling and Advocacy Program (HICAP), 701 W. 51st W-352, Austin, Texas, 78751, at 1-800-252-9240 to receive counseling regarding the purchase of long-term care or other health care coverage. This program is a senior insurance counseling program provided by the Area Agency on Aging under the authority of the Texas Health and Human Services commission.

A financial representative (licensed insurance agent) will contact you.

Your state's insurance department may have additional information, including a buyer's guide, explaining long-term care insurance. This long-term care insurance policy contains exclusions and limitations. For costs and complete details, please contact your financial representative (licensed insurance agent).

The purpose of this material is for the marketing and solicitation of insurance.

Long-Term Care Insurance Policy forms TT.LTC.(1010) and TT.LTC.(0213).

Form numbers may vary by state.

Long-Term Care Insurance Policy forms TT.LTC.ML.(1010) and TT.LTC.ML.(0213) are only available in New Jersey, New York, Ohio, and Pennsylvania.

Long-Term Care Insurance Policy form TT.LTC.LP.(0213) is only available in Texas.

Long-Term Care Insurance Policy form TT.LTCN.(0213) is only available in Massachusetts.

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**Northwestern Long Term Care
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State: Arkansas Filing Company: Northwestern Long Term Care Insurance Company
 TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
 Product Name: 90-2486 LTC (0113)
 Project Name/Number: 90-2486 LTC (0113)/90-2486 LTC (0113)

Supporting Document Schedules

		Item Status:	Status Date:
Satisfied - Item:	Statement of Variability	Approved	12/18/2012
Comments:			
Attachment(s):			
1 SOV 90-2487 LTC (0113).pdf			
1 SOV 90-2486 LTC (0113).pdf			

Statement of Variability

For LTC Advertising Form 90-2487 LTC (0113) and 90-2487-44 LTC (0113)

Bracketed Item	Reference	Explanation of Variability
Discounts: Spousal, Companion and MultiLife – page 3	1	Discount amounts may change depending on experience and interest rates through the end of the year
Discounts: Spousal, Companion and MultiLife – page 3	2	Discount amounts may change depending on experience and interest rates through the end of the year
Discounts: Spousal, Companion and MultiLife – page 3	3	Discount amounts may change depending on experience and interest rates through the end of the year
Maximum Tax Deductible Long-Term Care Premium – Page 5	4	The tax deductible premium amounts are adjusted for inflation every year
Dividend Amount Announced – Page 6	5	The dividend amount is subject to change
The Year the Dividend was Announced in – page 6	6	All dividend information is subject to change
Company ratings – page 7	7	Ratings may change depending on third party findings
Company ratings – page 7	8	Ratings may change depending on third party findings

Statement of Variability

For LTC Advertising Form 90-2486 LTC (0113)

Bracketed Item	Explanation of Variability
The company was named "World's Most Admired" life insurance company by FORTUNE® magazine.	<p>This will appear if our company is named "World's Most Admired" life insurance company by FORTUNE magazine and the date and year of the survey will be updated to reflect the most recent Issue of the FORTUNE magazine survey.</p> <p>This will not appear if our company is NOT named "World's Most Admired" life insurance company by FORTUNE magazine.</p>
July 2011	The Northwestern Long Term Care Insurance Company Data will be updated annually.
137,000	This amount will vary depending on the amount of long-term care policies that our company has in force.
\$314 million	This amount will vary depending on the amount of long-term care premiums that are in force.
\$12.8 million dividend for 2012	This amount will vary depending on the amount of dividends announced for each year.
Company ratings	These ratings will vary based on future third party ratings and date of the ratings will be updated based on the most recent third party ratings (this includes footnote disclosure)
2000 Top Ten Writers of Long-Term Care Insurance	The year used for the Top Ten Writers of Long-Term Care Insurance will be updated annually. The company listing will be updated annually to reflect Top Ten Writers of Long-Term Care Insurance for that year.
2011 Top Ten Writers of Long-Term Care Insurance	The year used for the Top Ten Writers of Long-Term Care Insurance will be updated annually. The company listing will be updated annually to reflect Top Ten Writers of Long-Term Care Insurance for that year.

State: Arkansas

Filing Company:

Northwestern Long Term Care Insurance Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name: 90-2486 LTC (0113)

Project Name/Number: 90-2486 LTC (0113)/90-2486 LTC (0113)

Superseded Schedule Items

Please note that all items on the following pages are items, which have been replaced by a newer version. The newest version is located with the appropriate schedule on previous pages. These items are in date order with most recent first.

Creation Date	Schedule Item Status	Schedule	Schedule Item Name	Replacement Creation Date	Attached Document(s)
12/07/2012	Replaced 12/18/2012	Form	LTC Building on a Strong Reputation	12/17/2012	90-2486 LTC (0113).pdf (Superseded)
12/07/2012	Replaced 12/18/2012	Supporting Document	Statement of Variability	12/17/2012	1 SOV 90-2486 LTC (0113).pdf (Superseded) 1 SOV 90-2487 LTC (0113).pdf



STRENGTH

Building on a Strong Reputation

*What makes
Northwestern Long
Term Care Insurance
Company stand out
from other long-term
care insurers?*

NORTHWESTERN LONG TERM CARE INSURANCE COMPANY:

- Is a wholly owned subsidiary of The Northwestern Mutual Life Insurance Company. [The company was named “World’s Most Admired” life insurance company by FORTUNE® magazine.]¹
- Has always maintained unsurpassed financial strength ratings from the four major rating services.
- Has over [137,000] long-term care policies in force totaling in excess of [\$314 million] in issued premium.²
- Has a history of offering new policy features to existing policyowners whenever possible and practical.³
- Offers a participating long-term care insurance policy, and announced a [\$12.8 million dividend for 2012].⁴

Northwestern Long Term Care Insurance Company ratings⁵

[A++ Highest Rating]
A.M. Best Company
April 2012]

[AAA Highest Rating]
Fitch Ratings
June 2012]

[AA+ Second Highest Rating]
Standard & Poor’s
June 2012]

[Aaa Highest Rating]
Moody’s Investors Service
October 2011]

Ratings are subject to change.

¹ [March 2, 2012 issue, FORTUNE® magazine survey.]

² Northwestern Long Term Care Insurance Company data as of [July 2011].

³ QuietCare®RR Series policyowners were sent a Benefit Upgrade offer in 2002. This offer included an amendment making their policies participating (eligible to receive dividends if warranted), and an offer to increase their Assisted Living Facility Maximum Daily Limit from 75% to 100% of Nursing Home Maximum Daily Limit and to include Caregiver Training Benefit. All of these enhancements were offered to policyowners at no additional charge. NLTC policyowners automatically received the Participation Amendment, but were required to sign and return the Benefit Upgrade Acceptance Form to the NLTC Administration Office in order to receive the Benefit Upgrade Amendment.

⁴ Neither the existence nor the amount of a dividend is guaranteed in any given year. Decisions with respect to the determination and allocation of divisible surplus are left to the discretion and sound business judgment of the Board of Directors. There is no guaranteed specific method or formula for the determination and allocation of divisible surplus. Northwestern Long Term Care Insurance Company’s approach is subject to change.

⁵ Ratings are for Northwestern Mutual Life Insurance Company and Northwestern Long Term Care Insurance Company, as of the most recent review and report by each rating agency. Northwestern Mutual’s ratings: [Moody’s Investors Service Aaa (highest), 10/2011; A.M. Best Company A++ (highest), 4/2012; Fitch Ratings AAA (highest), 6/2012; Standard & Poor’s AA+ (second highest), 6/2012.] Ratings are subject to change.

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INDUSTRY EVOLUTION

Many of our competitors have either abandoned the long-term care insurance marketplace or have merged their product line with another company. Of the top ten companies selling long-term care insurance in [2000], many are no longer selling long-term care insurance today and few are of the same ownership.

Northwestern Long Term Care Insurance Company began issuing long-term care insurance in 1998 only after closely examining the long-term care insurance marketplace, and we have quickly moved into the top ten in newly issued business while pricing to promote long-term stability.

[2000] Top Ten Writers of Long-Term Care Insurance*	[2011] Top Ten Writers of Long-Term Care Insurance*
[Aegon]	[Bankers Life & Casualty]
[CNA Insurance]	[Genworth (formerly AMEX & GE)]
[Conseco]	[John Hancock (Manulife)]
[Fortis]	[Massachusetts Mutual]
[GE Capital]	[Mutual of Omaha]
[IDS Life]	[New York Life]
[John Hancock]	[Northwestern Long Term Care Insurance Company]
[Penn Treaty]	[Prudential]
[State Farm]	[State Farm Mutual Automobile]
[UNUM]	[Transamerica Long Term Care]

* In alphabetical order as reported by LIMRA International in [2011].

Examples of companies that have discontinued selling long-term care insurance since 1996

- AAL (Aid Association for Lutherans/ Thrivent Financial for Lutherans)
- Aetna
- Allianz
- AMEX
- Bankers United, Life Investors, Monumental Life
- Berkshire Life
- CNA (Individual)
- Conseco Senior Health
- CUNA Mutual
- Equitable Life & Casualty
- Fortis/Time
- Guarantee Trust Life
- IDS Life
- Lincoln Benefit
- MetLife
- Mutual Protective/Medico
- Penn Treaty
- Pioneer Life
- TIAA Cref
- Transport Life
- The Travelers

In Texas, a prospective insured may contact the Health Information Counseling and Advocacy Program (HICAP), 701 W. 51st W-352, Austin, Texas, 78751, at 1-800-252-9240 to receive counseling regarding the purchase of long-term care or other health care coverage. This program is a senior insurance counseling program provided by the Area Agency on Aging under the authority of the Texas Health and Human Services commission. A financial representative (licensed insurance agent) will contact you.

Your state's insurance department may have additional information, including a buyer's guide, explaining long-term care insurance. This long-term care insurance policy contains exclusions and limitations. For costs and complete details, please contact your financial representative (licensed insurance agent).

This material is produced for the marketing and solicitation of insurance. This policy includes exclusions and limitations. For costs and further details of the coverage, including exclusions, any reductions or limitations and terms under which the policy may be continued in force, see your licensed insurance agent/producer or write to the company. A financial representative (a licensed insurance agent/producer) may contact you.

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