Reasonableness of Assumptions Certification
Equity Indexed Universal Life Insurance
American Bankers Life Assurance Company of Florida

I, Jonathan P. Jannarone, am the appointed actuary for American Bankers Life Assurance Company of Florida. The company meets the Hedge as Required criteria for policies reserved under the Implied Guarantee Rate Method. I have reviewed the assumptions underlying the values assigned to all equity index options used in the determination of the implied guaranteed rate used in the calculation of reserves under the Implied Guaranteed Rate Method for all equity indexed universal life insurance policies issued or reinsured by American Bankers Life Assurance Company of Florida and reported in the statutory financial statement as of March 31, 2009.

No policies were issued since 2003 and no future issues are expected. The assumptions at the start of the 2002 term used to determine such option values for the 2002 term are:

1. Reasonable in light of current relevant economic conditions at the start of the current term; and
2. Consistent with the comparable assumptions used to determine the statement of value of any derivative instruments as of the valuation date used to hedge the equity index-based obligations embedded in the equity indexed life policies subject to this certification.

The assumptions at issue used to determine the equity index option values for terms subsequent to the current term are:

1. Determined in accordance with Implied Guaranteed Rate Method
2. Based on quantitative data for the base case (l-year European At- The-Money) of 3% plus average annualized daily actual volatility over the 60 months previous to the calendar year of issue (19.55% for 2002 issues).
3. Reasonably adjusted to reflect the following variances from the base case due to benefit design and capital market reasons
    a. 75% of base volatility was used to determine the call price of the 20% cap on the maximum increase in the index value.
4. Reliant on the following source for assumptions not prescribed by this Actuarial Guideline:
    a. The LIBOR-USD fixed 1 month rate was used as the risk free rate.

Jonathan P. Jannarone, Vice President and Appointed Actuary, Life & Corporate Actuarial

April 3, 2009
Date of Certification