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January 9, 2017

HAND DELIVERY

Richard A. Hinkel
 Insurance Financial Examiner Chief
 Bureau of Financial Analysis and Examinations
 Office of the Commissioner of Insurance
 125 South Webster Street, 2nd Floor
 Madison WI 53702

RECEIVED
 MISSOURI COMMISSIONER
 OF INSURANCE
 2017 JAN -9 PM 2:59

RE: Form A - Acquisition of control of Southern Guaranty Insurance Company ("SGIC") by Premier Servicing, LLC ("Premier")

Dear Richard:

Thank you for Kristin Forsberg's letter dated December 1, 2016 regarding this Form A filing. Her inquiries are set forth in bold below followed by the responses of Premier.

- Pro Forma Financial Statements: Please provide corrected Pro Forma financial statements, along with a narrative discussing what steps the Applicant intends to take to ensure that the SGIC will meet its statutory capital and surplus requirements at all times.**

Five year financial projections for SGIC to replace Exhibit D-4 included with the Form A and Exhibit L included with Premier's November 10, 2016 letter regarding the Form A are included with the feasibility study enclosed as Exhibit N. As you will note, the projections show that the proposed initial capital and surplus for SGIC of \$35 million ensures that it will far exceed its statutory capital and surplus requirements -- both RBC and compulsory and security surplus -- at all times.

- Capitalization/Feasibility Study: Please provide a third party feasibility study as to the reasonableness and financial soundness of the financial projections and underlying assumptions. [Note: The feasibility study should be prepared by an independent qualified actuarial or public accounting firm that is experienced in preparing feasibility studies for the insurance industry.]**

Enclosed as Exhibit N is a feasibility study prepared by Allen Bailey & Associates to support the revised business plan for SGIC enclosed as Exhibit B (which replaces Exhibit B as included with the Form A).

Richard A. Hinkel
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Please note that Exhibit B and Exhibit N (the "Confidential Information") contain proprietary and confidential information. Pursuant to Wis. Admin. Code § Ins 40.05, the Confidential Information is required under Wis. Stat. § 601.42; moreover, the Confidential Information is not public, and is therefore presumed to be proprietary and confidential under Wis. Stat. § 601.465(1n)(a), and the Office may withhold this information from public disclosure under Wis. Stat. § 601.465(1m)(a). The Confidential Information also includes "trade secrets" under Wis. Stat. § 134.90(1)(c) because it "derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use [and] is the subject of efforts to maintain its secrecy that are reasonable under the circumstances." As you know, a trade secret is exempt from the public records law under Wis. Stat. § 19.36(5) and Wis. Admin. Code § Ins 6.13(2). In line with these provisions, we request that you do not release the Confidential Information to the public.

We hope this information is responsive to your inquiries. If you have any questions, please do not hesitate to contact me or Lane Kent of Premier Administrative Solutions (at Lkent@premieradministrativesolutions.com or 727-266-9958). Thank you for your expeditious consideration of the Form A.

Very truly yours,

QUARLES & BRADY LLP



William J. Toman

WJT:mjw
Enclosures

cc (w/enc): Lane Kent