



State of Wisconsin / OFFICE OF THE COMMISSIONER OF INSURANCE

Scott Walker, Governor
Theodore K Nickel, Commissioner

Wisconsin.gov

125 South Webster • P.O. Box 7873
Madison, Wisconsin 53707-7873
Phone: (608) 266-3585 • Fax: (608) 266-9935
E-Mail: information@oci.state.wi.us
Web Address: oci.wi.gov

Notice of Adoption and Filing of Examination Report

Take notice that the proposed report of the market conduct examination of the

PROGRESSIVE NORTHERN INSURANCE COMPANY
6300 WILSON MILLS RD
MAYFIELD VILLAGE OH 44143

dated MARCH 19, 2010, and served upon the company on DECEMBER 2, 2010, has been adopted as the final report, and has been placed on file as an official public record of this Office.

Dated at Madison, Wisconsin, this 31st day of OCTOBER, 2011.

Theodore K. Nickel
Commissioner of Insurance

**STATE OF WISCONSIN
OFFICE OF THE COMMISSIONER OF INSURANCE**

MARKET CONDUCT EXAMINATION

OF

**PROGRESSIVE NORTHERN INSURANCE COMPANY
MAYFIELD VILLAGE, OHIO**

**JULY 28, 2008-AUGUST 8, 2008
MARCH 8, 2010-MARCH 19, 2010**

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State of Wisconsin / OFFICE OF THE COMMISSIONER OF INSURANCE

Jim Doyle, Governor
Sean Dilweg, Commissioner

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Bureau of Market Regulation
125 South Webster Street • P.O. Box 7873
Madison, Wisconsin 53707-7873
(608) 266-3585 • (800) 236-8517
Fax: (608) 264-8115
E-Mail: ocicomplaints@wisconsin.gov
Web Address: oci.wi.gov

March 19, 2010

Honorable Sean Dilweg
Commissioner of Insurance
Madison, WI 53702

Commissioner:

Pursuant to your instructions and authorization, a targeted market conduct examination was conducted July 28 to August 8, 2008 and March 8 to March 19, 2010.

PROGRESSIVE NORTHERN INSURANCE COMPANY
Mayfield Village, Ohio

and the following report of the examination is respectfully submitted.

I. INTRODUCTION

Progressive Northern Insurance Company is a stock company domiciled in Wisconsin where it was incorporated on August 19, 1980. The company commenced doing business in Wisconsin on March 8, 1981. Progressive Northern primarily writes automobile insurance in Wisconsin, along with smaller amounts of homeowner's and inland marine insurance.

In 2007, 2008, and 2009 the company reported written premium in Connecticut, Delaware, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Maine, Maryland, Minnesota, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Utah, Vermont, Virginia, Washington, Wisconsin, and Wyoming. In 2006, the company reported written premium in the same 31 jurisdictions except Wyoming. The following table summarizes the

total direct national premium written in 2009, 2008, 2007, and 2006 as compared to the total direct premium written in Wisconsin.

National Direct Premium Written to Wisconsin Direct Premium Written

Year	National Direct Premium Written	Wisconsin Direct Premium Written	WI As a Percentage of the National Premium
2009	\$1,292,361,291	\$37,260,046	2.9%
2008	\$1,081,720,737	\$45,442,736	4.2%
2007	\$1,178,629,270	\$67,911,026	5.8%
2006	\$1,283,990,897	\$82,485,454	6.4%

The majority of the premium earned by the company in 2006, 2007, 2008, and 2009 was for private passenger auto insurance.

The following tables summarize the premium earned and incurred losses in Wisconsin for 2009, 2008, 2007 and 2006 broken down by line of business.

Wisconsin Direct Premium and Loss Summary

Line of Business	2009	
	Premium Earned	Losses Incurred
Private Passenger Auto	\$19,924,106	\$10,035,518
Commercial Auto	\$344,027	-\$2,482,349
All Others	\$17,655,085	\$7,901,598
Total	\$37,923,218	\$15,454,767

Line of Business	2008	
	Premium Earned	Losses Incurred
Private Passenger Auto	\$22,266,323	\$15,525,809
Commercial Auto	\$8,305,461	\$3,282,087
All Others	\$21,680,843	\$12,761,985
Total	\$52,252,627	\$31,569,881

Line of Business	2007	
	Premium Earned	Losses Incurred
Private Passenger Auto	\$28,146,245	\$18,708,997
Commercial Auto	\$13,642,008	\$8,241,963
All Others	\$27,849,982	\$15,623,097
Total	\$69,638,235	\$42,574,057

Line of Business	2006	
	Premium Earned	Losses Incurred
Private Passenger Auto	\$36,435,755	\$14,430,170
Commercial Auto	\$15,107,676	\$10,417,335
All Others	\$36,394,388	\$17,778,284
Total	\$87,937,819	\$42,625,789

In 2008, the company was the 12th leading insurer in Wisconsin writing auto insurance with a 1.7% market share. In 2007, the company was in 8th place with a 2.2% share. In 2006, the company ranked as the sixth largest writer of auto insurance in Wisconsin with 2.8% market share. In 2005, the company ranked as the fifth largest writer of auto insurance in Wisconsin with a 3.7% market share.

The Office of the Commissioner of Insurance received 77 complaints against the company between January 1, 2007 through December 31, 2009. A complaint is defined as 'a written communication received by the Commissioner's Office that indicates dissatisfaction with an insurance company or agent.

The total number of complaints received in 2007 decreased by 42% from the number of complaints received in 2006 (55 total complaints were received in 2006). The majority of the complaints against the company are related to claim handling issues. The company ranked 11th on the private passenger automobile above-average complaint-to-premium list for 2006. In 2007 and 2008 Progressive Northern did not appear on either above-average complaint list.

The following table categorizes the complaints received against the company by type of policy and complaint reason. There may be more than one type of coverage and/or reason for each complaint.

Complaints Received

2009		Reason				
Coverage Type	Total.	Under-writing.	Marketing & Sales	Claims	Policyholder Service	Other
Personal Auto	11	1	1	9		
Commercial Vehicle						
Com Prop & Liability						
Home/Farmowners	2			2		
Commercial Liability						
Worker's Comp						
Fidelity & Surety						
All Others	2			2		
Total	15	1	1	13		

2008		Reason				
Coverage Type	Total.	Under-writing.	Marketing & Sales	Claims	Policyholder Service	Other
Personal Auto	16	1		15		
Commercial Vehicle	1		1			
Com Prop & Liability	1		1			
Home/Farmowners	6		1	5		
Commercial Liability						
Worker's Comp						
Fidelity & Surety						
All Others	6			5		1
Total	30	1	3	25		1

2007		Reason				
Coverage Type	Total.	Under-writing.	Marketing & Sales	Claims	Policyholder Service	Other
Personal Auto	19	5		11	3	
Commercial Vehicle						
Com Prop & Liability	1			1		
Home/Farmowners	7			7		
Commercial Liability						
Worker's Comp						
Fidelity & Surety						
All Others	5			3		2
Total	32	5		22	3	2

2006		Reason				
Coverage Type	Total.	Under-writing.	Marketing & Sales	Claims	Policyholder Service	Other
Personal Auto	45	2		35	8	
Commercial Vehicle	6	1		4	1	
Com Prop & Liability						
Home/Farmowners	1			1		
Commercial Liability						
Worker's Comp						
Fidelity & Surety						
All Others	3	1		1	1	
Total	55	4		41	10	

E Commerce

The website for the company is Progressive's group website "progressive.com". The website is interactive; it allows a visitor to obtain a quote, and also find an agent via an online search through the website. Moreover, current policyholders can access online customer service by entering their user IDs and passwords. Online claim reporting is accessible, with third party claimants able to access their claims by entering their claim numbers into the appropriate section of the claims' webpage.

II. PURPOSE AND SCOPE

A targeted examination was conducted to determine whether the company's practices and procedures comply with the Wisconsin insurance statutes and rules. The 2008 examination focused on the period from July 1, 2006 through December 31, 2007. The 2010 examination focused on the period from January 1, 2009 through December 31, 2009. The examination included a review of any subsequent events deemed important by the examiner-in-charge during the examination.

The 2008 portion of the examination was limited to a review of mobile homeowner's claims and private passenger automobile business in Wisconsin and included a review of policyholder service and complaints, marketing and sales, underwriting and rating, claims, and policy forms and rates. The 2010 portion of the examination focused on a review of private passenger automobile business in Wisconsin and included a review of underwriting and rating and producer licensing.

The report is prepared on an exception basis and comments on those areas of the company's operations where adverse findings were noted.

III. CURRENT EXAMINATION FINDINGS

Claims

During the 2008 portion of the exam, the examiners reviewed 339 closed private passenger automobile and mobile homeowners' claims. Of these claims, 88 were paid and 100 were closed without payment for private passenger automobile; 50 were paid and 51 were closed without payment for mobile homeowners, and 50 were private passenger automobile subrogation files. The company's claims handling practices and procedures were also reviewed. The following exceptions were noted.

The examiners found that the company failed to send denial letters to claimants in certain situations. The company provided documentation to OCI which states that denial letters are not sent to insureds when the loss is less than the deductible or when 'courtesy inspections' find that the damage was not caused by a named peril. The claimants are verbally informed by the adjuster why there is no coverage. Section Ins 6.11 (3) (a) 7, Wis. Adm. Code, states in part, that insurers must affirm or deny coverage of claims within a reasonable time after proof of loss has been completed. If a written denial is not sent, there is no documentation to ensure that claims are being affirmed or denied.

1. **Recommendation:** It is recommended that the company provide claimants with denial letters whenever it is denying a claim for any reason in order to document its compliance with s. Ins 6.11 (3) (a) 7, Wis. Adm. Code.

Marketing & Sales

During the 2008 portion of the exam, the examiners requested that the company supply forms relating to its marketing and sales so that they could be reviewed for compliance, i.e., readability; policy language simplification; proper notifications; inclusion of authorized clauses; and type of forms available. The company failed to supply the forms or applications as requested by OCI. The company provided the requested information during the 2010 portion of the examination.

Producer Licensing

During the review of the terminated agent files in 2008, the examiners found that in 39 of the 50 reviewed files, the company did not notify the agents that they may not act as representatives of the company and did not make a formal demand for the return of all indicia. Also, 11 files did not contain notices from the company informing the producers that they were terminated.

In the 2010 examination, 50 producer termination files were reviewed. Of the 50 files reviewed, it was found that 45 files contained termination notices that the company sent to its terminated producers which failed to state that the terminated agent may not act as a representative of the company and failed to make a formal demand for the return of all indicia. Fifteen of the 50 files reviewed contained termination notices that were sent to the producers after the statutorily required 15 days. Section Ins 6.57 (2), Wis. Adm. Code, requires an insurer to file a notice of termination prior to or within 30 days of the termination date of a producer with the Commissioner. Also, prior to or within 15 days of filing the termination notice with the Commissioner, the insurer shall provide the agent written notice that the agent is no longer appointed as a representative of the company and that he or she may not act as a representative and must include a formal demand for the return of all indicia.

- 2. Recommendation:** It is recommended that the company revise its termination notices sent to its agents to include a statement that the agent is no longer appointed as a representative for the company, the agent may no longer act as representative of the company, and make a formal demand for the return of all indicia, in order to comply with s. Ins 6.57 (2), Wis. Adm. Code.
- 3. Recommendation:** It is recommended that prior to or within 15 days of the company terminating an agent with OCI, the company shall provide the agent with written notice of termination in order to comply with s. Ins 6.57 (2), Wis. Adm. Code.

Underwriting & Rating

During the 2008 portion of the examination's underwriting and rating review, the examiners requested that the company supply any information, charts, bulletins, codes, etc., for

its underwriting department. The company did not provide the requested information. The company indicated that it does not utilize a traditional underwriting department. However, the company did not supply the requested information regardless of whether it used a traditional or non-traditional department. Research on its website revealed a list that provides the consumer with Progressive insurance companies that underwrite motor vehicle insurance policies. Therefore the company does conduct underwriting and rating activity as evidenced by the rate and rule filings. The company did provide the required information during the 2010 portion of the examination.

Policy Forms & Rates

During the 2010 portion of the examination, the examiners reviewed 24 private passenger automobile, motor home, and travel trailer forms the company indicated were currently being used in Wisconsin in order to verify that the provisions of the policy forms comply with the Wisconsin insurance laws and regulations. The following exceptions were noted.

The examiners found ten application forms contained language that if the initial payment for insurance was made by credit card and the company was unable to collect the payment from the card issuer, the policy would be void. The form numbers for the applications follow: 7982 WI (08/09), Z030 WI (09/09), Z031 WI (09/09), Z030 WI (08/09), Z031 WI (08/09), Z030 WI (10/08), Z031 WI (10/08), 4868 WI (08/09), 4868 WI (10/08) and 4868 (03/07). When the company had filed applications containing this language with OCI in 2003, OCI objected to the language. In response to the objection, the company revised its application language to provide that the company would cancel the policy for nonpayment of premium rather than void the policy. The examiners also found that the Auto Product & Underwriting Guide, in the Billing & Payment section, under the Non-Sufficient Funds (NSF) for Insured Payments heading, the company indicated that if the NSF was on the down payment of a policy, the coverage would be null and void. Section 631.36 (2) (b), Wis. Stat, states, in part, that no insurance policy may be

canceled by the insurer prior to the expiration of the agreed term except for failure to pay a premium when due. No cancellation is effective until at least 10 days after the 1st class mailing or delivery of a written notice to the policyholder. Voiding a policy for nonpayment of premium, without providing notice to the policyholder, does not comply with the statute. The company responded that it has not voided any policy during the period of review due to nonpayment of premium of the initial payment.

4. **Recommendation:** It is recommended that the company revise the language in its Auto Product & Underwriting Guide and its applications to provide for cancellation of a policy for nonpayment of premium if the down payment is rejected due to non-sufficient funds or the initial payment for insurance is made by credit card and the company is unable to collect the payment from the card issuer in order to comply with s. 631.36 (2), Wis. Stat.

Effective November 1, 2009, statutory changes were made to s. 632.32, Wis. Stat., that affected every policy of insurance issued or delivered in Wisconsin against an insured's liability for loss or damage resulting from an accident caused by any motor vehicle, whether the loss or damage is to property or to a person. The policy forms used on and after November 1, 2009, were reviewed for compliance with the newly enacted laws. The following exceptions were noted.

The examiners found that policy forms Z798 WI (08/09), Z445 WI (08/09), and Z797 WI (08/09) contain language that provides an additional definition of underinsured motor vehicle that lists vehicles and equipment which are not included within the definition: owned by you or a relative; operated on rails or crawler treads; and while used as a residence or premises. By excluding these vehicles, the company is narrowing the definition as provided by the statute. Section 632.32 (2) (e), Wis. Stat., as modified by 2009 WI Act 342 effective May 27, 2010, states, in part, that an underinsured motor vehicle means a motor vehicle to which all of the following apply: 1. the motor vehicle is involved in an accident with a person who has underinsured motorist coverage, 2. at the time of the accident, a bodily injury liability insurance policy applies to the motor vehicle or the owner or operator of the motor vehicle has furnished

proof of financial responsibility for the future under subch. III of ch. 344 and it is in effect or is a self-insurer under another applicable motor vehicle law, 3. the limits under the bodily injury liability insurance policy or with respect to the proof of financial responsibility or self-insurance are less than the amount needed to fully compensate the insured for his or her damages. 2011 WI Act 14 repeals s. 632.32 (2) (e), Wis. Stat., in its entirety. However, s. 632.32 (2) (at), Wis. Stat., as modified by 2009 WI Act 342 effective May 27, 2010, defines a 'motor vehicle' as a self-propelled land motor vehicle designed for travel on public roads and subject to motor vehicle registration under ch. 341. A trailer or semitrailer that is designed for use with and connected to a motor vehicle shall be considered a single unit with the motor vehicle. 'Motor vehicle' does not include farm tractors, well drillers, road machinery, or snowmobiles.' Chapter 341 uses definitions set forth in ch. 340. Section 340.01 (35), Wis. Stat., defines a 'motor vehicle' as a vehicle, including a combination of two or more vehicles or an articulated vehicle, which is self-propelled, except a vehicle operated exclusively on a rail. The company's exemption to the definition is not limited to vehicles that are operated exclusively on a rail. 2011 WI Act 14 is effective for newly issued and renewed policies on or after November 1, 2011.

5. **Recommendation:** It is recommended that the company revise its automobile policy forms to amend its definition of underinsured motor vehicle regarding vehicles operated on rails in order to comply with ss. 632.32 (2) (at), as modified by 2009 WI Act 342, and 340.01 (35), Wis. Stat.

In lieu of revising all its automobile policy forms to comply with 2009 WI Act 28, as modified by 2009 WI Act 342, regarding vehicles owned by an insured or a relative of the insured and while used as a residence or premises, it is also recommended that the company develop and implement a written procedure to ensure claims for automobile policies newly issued or renewed on or after November 1, 2009 and before November 1, 2011 are adjusted using the definition of underinsured motor vehicle in compliance with ss. 632.32 (2) (at), 632.32 (2) (e), and 340.01 (35), Wis. Stat., as modified by 2009 WI Act 342.

The examiners found that policy forms Z798 WI (08/09), Z445 WI (08/09), and Z797 WI (08/09) contain language that provides an additional definition of uninsured motor vehicle that lists vehicles and equipment which are not included within the definition: owned by you or a relative or furnished or available for the regular use of you or a relative; operated on rails or

crawler treads; and while located for use as a residence or premises. By excluding these vehicles, the company is narrowing the definition as provided by the statute. Section 632.32 (2) (g), Wis. Stat., as modified by 2009 WI Act 342 effective May 27, 2010, defines an "uninsured motor vehicle" as a motor vehicle that is involved in an accident with a person who has uninsured motorist coverage and with respect to which, at the time of the accident, a bodily injury liability insurance policy is not in effect and the owner or operator has not furnished proof of financial responsibility for the future under subch. III of ch. 344 and is not a self-insurer under any other applicable motor vehicle law. 'Uninsured motor vehicle' also includes any of the following motor vehicles involved in an accident with a person who has uninsured motorist coverage: 1. an insured motor vehicle, or a motor vehicle with respect to which the owner or operator is a self-insurer under any applicable motor vehicle law, if before or after the accident the liability insurer of the motor vehicle, or the self-insurer, is declared insolvent by a court of competent jurisdiction, 2. except as provided in subd. 3., an unidentified motor vehicle, provided that an independent 3rd party provides evidence in support of the unidentified motor vehicle's involvement in the accident, or 3. an unidentified motor vehicle involved in a hit-and-run accident with a person. 2011 WI Act 14 revises the definition of an uninsured motor vehicle regarding unidentified motor vehicles by replacing s. 632.32 (2) (g) 2., Wis. Stat. in its entirety to read: 2. A phantom motor vehicle, if all of the following apply: a. The facts of the accident are corroborated by competent evidence that is provided by someone other than the insured or any other person who makes a claim against the uninsured motorist coverage as a result of the accident; b. Within 72 hours after the accident, the insured or someone on behalf of the insured reports the accident to a police, peace, or judicial office or to the department of transportation or, if the accident occurs outside of Wisconsin, the equivalent agency in the state where the accident occurs; c. Within 30 days after the accident occurs, the insured or someone on behalf of the insured files with the insurer a statement under oath that the insured or a legal representative of the insured has a cause of action arising out of the accident for damages

against a person whose identity is not ascertainable and setting forth the facts in support of the statement. In addition, s. 632.32 (2) (at), Wis. Stat., as modified by 2009 WI Act 342 effective May 27, 2010, defines a 'motor vehicle' as a self-propelled land motor vehicle designed for travel on public roads and subject to motor vehicle registration under ch. 341. A trailer or semitrailer that is designed for use with and connected to a motor vehicle shall be considered a single unit with the motor vehicle. 'Motor vehicle' does not include farm tractors, well drillers, road machinery, or snowmobiles.' Chapter 341 uses definitions set forth in ch. 340. Section 340.01 (35), Wis. Stat., defines a 'motor vehicle' as a vehicle, including a combination of two or more vehicles or an articulated vehicle, which is self-propelled, except a vehicle operated exclusively on a rail. The company's exemption to the definition is not limited to vehicles that are operated exclusively on a rail.

6. **Recommendation:** It is recommended that the company revise its automobile policy forms to amend its definition of uninsured motor vehicle in order to comply with ss. 632.32 (2) (at), 632.32 (2) (g), and 340.01 (35), Wis. Stat. It is also recommended that the company revise all automobile policy forms to amend its definition of uninsured motor vehicle for policies newly issued and renewed on or after November 1, 2011, in order to comply with s. 632.32 (2) (g) 2, Wis. Stat. of 2011 WI Act 14 and refile the revised policy forms with the commissioner.

IV. CONCLUSION

A total of six recommendations were made as a result of this examination relating to the company's need to modify claims, producer licensing, and underwriting and rating.

The company needs to provide claimants with denial letters whenever it is denying a claim for any reason.

The company's producer termination notices need to include a statement that the agent may no longer act as a representative of the company and must return all indicia. The company must also provide notice of termination to its terminated agents and send the notices timely.

The company must revise its Auto Product & Underwriting Guide procedures and the language in its applications to provide for the company to send a notice of cancellation to new business applicants whose initial payment of premium is rejected or dishonored, whether by check, electronic funds transfer or credit card, unless proof of the applicant's intention to deceive the company is documented. In addition, the company must revise the definitions of an 'uninsured motor vehicle' and an 'underinsured motor vehicle' in its policy forms to conform to the revised statutory law changes that were effective November 1, 2009. It also must revise its forms to comply with the changes effective November 1, 2011 regarding 'uninsured motor vehicle' and 'underinsured motor vehicle' for all policies renewed on or after November 1, 2011.

V. SUMMARY OF RECOMMENDATIONS

Claims

- Page 7
1. It is recommended that the company provide claimants with denial letters whenever it is denying a claim for any reason in order to document its compliance with s. Ins 6.11 (3) (a) 7, Wis. Adm. Code.

Producer Licensing

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2. It is recommended that the company revise its termination notices sent to its agents to include a statement that the agent is no longer appointed as a representative for the company, the agent may no longer act as representative of the company, and make a formal demand for the return of all indicia, in order to comply with s. Ins 6.57 (2), Wis. Adm. Code.

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3. It is recommended that prior to or within 15 days of the company terminating an agent with OCI, the company shall provide the agent with written notice of termination in order to comply with s. Ins 6.57 (2), Wis. Adm. Code.

Policy Forms & Rates

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4. It is recommended that the company revise the language in its Auto Product & Underwriting Guide and its applications to provide for cancellation of a policy for nonpayment of premium if the down payment is rejected due to non-sufficient funds or the initial payment for insurance is made by credit card and the company is unable to collect the payment from the card issuer in order to comply with s. 631.36 (2), Wis. Stat.

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5. It is recommended that the company revise its policy forms Z798 WI (08/09), Z445 WI (08/09), and Z797 WI (08/09) to amend the definition of underinsured motor vehicle in order to comply with s. 632.32 (2) (e), Wis. Stat. It also must revise its forms to comply with the changes effective November 1, 2011 regarding 'uninsured motor vehicle' and 'underinsured motor vehicle' for all policies renewed on or after November 1, 2011.

- Page 11
6. It is recommended that the company revise its policy forms Z798 WI (08/09), Z445 WI (08/09), and Z797 WI (08/09) to amend the definition of uninsured motor vehicle in order to comply with s. 632.32 (2) (g), Wis. Stat. It is also recommended that the company revise all automobile policy forms to amend its definition of uninsured motor vehicle for policies newly issued and renewed on or after November 1, 2011, in order to comply with s. 632.32 (2) (g) 2, Wis. Stat. of 2011 WI Act 14 and refile the revised policy forms with the commissioner.

VI. ACKNOWLEDGEMENT

The courtesy and cooperation extended to the examiners during the course of the examination by the officers and employees of the company is acknowledged.

In addition, to the undersigned, the following representatives of the Office of the Commissioner of Insurance, state of Wisconsin, participated in the examination.

<u>Name</u>	<u>Title</u>
Karen Becker	Insurance Examiner
Gary Morris	Insurance Examiner
Ashley Natysin, CIE, MCM	Insurance Examiner
Ellen Schwartz, MCM	Insurance Examiner
Barry Haney	Insurance Examiner
Ronnie Demergian, CPCU, MCM	Insurance Examiner

Respectfully submitted,



Drew Hunkins, MCM
Examiner-in-Charge