THE SCHEDULE F PENALTY — EFFECTIVE OR EVADED? by LeRoy J. Simon and Steven M. Visner

BIOGRAPHIES:

Immediately prior to Mr. Simon's recent retirement he spent four years as Executive Consultant in Coopers & Lybrand's Casualty Actuarial and Risk Management Consulting group. He began his career with eight years at Mutual Service Insurance Companies followed by eight years at Insurance Company of North America. The next six years were as General Manager of the National Insurance Actuarial and Statistical Association - a research organization in the property insurance field. He then spent 17 years with Prudential Reinsurance Company as Senior Vice President. He served as Chairman of the Foreign Credit Insurance Association and of American Nuclear Insurers (and in addition was Chairman of its Foreign Operations Committee 1982-87). He was President of the CAS in 1972 and has served two terms on its Board. He is also a Member of the American Academy of Actuaries and has served on its Board. He served on the ASTIN Committee 1973-91 and was its Chairman for 1974-78. He also served on the Counseil de Direction of the International Actuarial Association (Brussels) 1974-91. He is a charter member of the Society of Insurance Research, and served as its fourth president in 1973. "Roy" graduated from the University of Minnesota with a Bachelor's degree in mathematics in 1948 and a Master's in statistics in 1949.

Mr. Visner is the Director of Casualty Actuarial Consulting in the New York office of Coopers & Lybrand. He is responsible for actuarial consulting and audit support for many insurers, reinsurers and large self-insured clients. Steve was formerly Executive Vice President for Sedgwick James in New York where he was in charge of their nation-wide Risk Management Consulting Practice. Prior to that he managed the loss reserve unit, the research and analysis unit, and the Workers Compensation unit in the actuarial department of Continental Insurance Company. He started his career at ISO. He is a Fellow of the Casualty Actuarial Society, a member of the American Academy of Actuaries, the International Actuarial Association, ASTIN, and is on the Program Planning Committee of the Conference of Consulting Actuaries as well as the CAS Ratemaking Committee. He teaches courses in loss reserving at The College of Insurance and is a frequent speaker at local and national RIMS conferences and the Society of Insurance Accountants. He has also published various articles on reserving and actuarial science in Risk Management Magazine. Steve graduated summa cum laude from Queens College of the City University of New York with a Bachelor's degree in mathematics in 1975.

ABSTRACT:

The revisions to Schedule F that could result in a penalty against surplus caused by authorized reinsurers have been in effect since the 1989 Annual Statement. This paper compiles statistics associated with these new penalties as well as the long-standing penalties due to unauthorized reinsurers and analyzes them. The impact the penalties have on companies and in total is measured. Several areas of interest are discussed and suggestions are made for improvements, revisions or refinements.

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A. Introduction

The 1990 Annual Statement marks the second year that insurance companies have had to fill out the Schedule F which includes the calculation of a penalty against surplus for overdue authorized reinsurance. We felt it was timely to see what this meant with respect to a company's surplus, its security, and its solvency. One would expect that any processing difficulties encountered by the companies in the initial year would have been overcome and the reporting would now be complete and correct. In addition, one might also expect that companies which had problems with the penalty would have sought and found ways to overcome those problems by this second round. This might be done in ways which would support and enhance the security regulations' objectives, or it might be done in ways which effectively circumvent the spirit of the regulation. We must point out that the companies included in this study are only 35 among the approximately 2000 groups/companies in the full population. They do represent \$63 billion of the \$138 billion of industry Surplus (46%) as of December 31, 1990. If we think of the individual company as representing the group of companies with which it is affiliated, then they represent \$82 billion or 60% of the industry. Further, the companies were selected deliberately and not by any random process and thus extrapolations of this data to all insurers would not be valid.

Beginning with the 1989 Annual Statement, insurers are required to include an exhibit for authorized reinsurers only, showing the aging of ceded reinsurance recoverables on paid losses. On that schedule reinsurers are characterized as "fast" or "slow" payers. (Note the terminology slow or fast payer is not used in the Annual Statement but is popularly used to simplify terminology.) The designation as fast or slow payer is established by looking at the ratio of reinsurance recoverable on paid losses that is more than 90 days overdue, divided by the sum of all reinsurance recoverable on paid losses and amounts recovered on paid losses during the prior 90 days. If that ratio is less than 20% then the reinsurer is considered a "fast" payer, and if the ratio is equal to or greater than 20% the reinsurer is considered a "slow" payer. The rest of the reinsurers, which might be termed "no-recoverable" reinsurers would be those having no reinsurance recoverables on paid losses and no amounts recovered on paid losses during the prior 90 days. Such reinsurers are not considered specifically in the Annual Statement, but there may very well be IBNR associated with those companies. The amount of the penalty for overdue authorized reinsurance is calculated differently for fast and slow payers while, of course, the no-recoverable reinsurers are dropped from further consideration.

For the fast payers, a surplus penalty equal to 20% of the recoverables on paid losses greater than 90 days overdue is calculated. For slow payers, a 20% surplus penalty is taken on <u>all</u> balances owed by reinsurers (an offset is allowed for letters of credit, trust agreements, funds held, and miscellaneous balances owed to the reinsurer).

Additionally, companies must indicate whether their reinsurer is subject to a delinquency proceeding such as conservation, rehabilitation or liquidation.

For some time now companies have been required to take a surplus penalty for unauthorized reinsurance in excess of deposits by (letters of credit or trust agreements) and funds withheld from such unauthorized companies. The new requirements related to authorized reinsurers mentioned above were developed as an attempt by regulators to generate more information about the company's ceded reinsurance program and to aid in monitoring companies which could be in hazardous financial condition as a result of uncollectibles from authorized companies. More emphasis on collectibility of reinsurance has been heightened by congressional reports examining the financial health of the industry and insolvencies which have been abetted by uncollectible reinsurance.

This paper reviews the tabulation of the Schedule F penalty for authorized reinsurance, explains the logic behind the calculations, and then reviews actual results. We have obtained Annual Statements from 35 leading insurance carriers in the country (both consolidated and lead company). We will analyze the impact of the new Schedule F penalty by reviewing various statistics taken from these Annual Statements. The impact of unauthorized reinsurers, "slow" authorized, and "fast" authorized reinsurers will be examined and contrasted.

We have chosen to encode company names as "#1", "#2", and so forth. The objective of this study is to make observations which we hope will lead to improved security through a better understanding of how the surplus penalty calculations are functioning in practice. Also note that these results are being published more than a year after December 31, 1990 (the date on which the data was compiled by the companies) and the 1991 or 1992 Annual Statements of the companies may be additionally refined and improved in this area.

B. Data Collection Process and Procedure

The selection process began with all companies that Business Insurance tracks regularly (see, for example, the issue of September 9, 1991 page 31) with respect to operating results. In addition, we supplemented the list with certain other large companies for a total of 35 companies as listed in Exhibit A. We wrote to each company asking for a copy of the Annual Statement for the company or, if it was a group of companies, for both the lead company and for the consolidated group. The consolidated Statements often omitted some of the detailed information we needed. In the final analysis, we only used the consolidated Statements for reference and relied on the individual company Statement for the analysis.

Most companies were very cooperative about sending us a copy of their Annual Statement, and, for those few which were not, the information is on the public record and

we went to an insurance department and got it. In addition, when the Annual Statement we received omitted certain data or had figures we questioned, they were checked against the copy on file in the insurance department. Our copies were in agreement with the Department's in each of the areas in which we were interested.

We recorded 45 items of information for each of the companies as described in Exhibit B and set forth in detail in Exhibit C. In addition, seven balancing checks were performed basically to assure that we were recording the information correctly, but also as a check on the company's correctness in reporting. We found that all 35 companies balanced correctly at Our Item (6). Similarly, all balanced at Our Item (11). Such balancing is to be expected since the figures to achieve the balance are all on the same (Liabilities) page of the Statement. Our Items (41), (42) and (43) normally balanced; that is, the sum of the detailed information on Authorized and Unauthorized reinsurers added to the reported total. In those cases where it did not balance, the companies explained it was caused by such things as uncollectible reinsurance reserves carried elsewhere, write-off of balances, or intercompany transactions. One company did not explain.

In Schedule F, Part 2B, Section 1, the Statement calls for a listing of the names of authorized reinsurers that have overdue balances with the company. Every cedant has done this except one. One of the effects of this listing of names could be to put pressure on a reinsurer to pay promptly and thus not appear on any cedant's list of slow payers. There is always the possibility that a sophisticated buyer will compile and use such a list.

After calculating the 20% penalty, every company carries it forward to the Liabilities page accurately with a few exceptions. The exceptions explain that it is due to reserves established for overdue reinsurance or that it is credited to affiliated companies under a pooling arrangement.

After we collected and balanced these Data Items (except as commented on above), we made a number of calculations based on this data as described in Exhibit D and set forth in Exhibit E.

C. Calculation of the Schedule F Penalty

Schedule F, Part 1A, Section 1 of the Annual Statement displays an aging of ceded reinsurance recoverable on paid losses. Amounts are displayed as current (1-29 days), 30-90 days overdue, 91-180 days overdue and greater than 180 days overdue, and in total. Amounts are displayed as of December 31st for all ceded reinsurance, individually by reinsurer. The aging exhibit includes both authorized and unauthorized reinsurers, along with appropriate totals for affiliates, U.S. reinsurers, pools, and all other companies. It should be noted that the total of all ceded reinsurance recoverable on paid losses, both for authorized and unauthorized companies is carried as an asset by the ceding company on Page 2 of the Annual Statement, Line 12 (reinsurance recoverable on paid losses). This is in contrast to the treatment of ceded reinsurance recoverables on unpaid losses as well as unearned premium, which are both treated as a reduction from liabilities.

Fast vs. Slow Payers

Information from the aging exhibit is utilized on Schedule F, Part 2B, Section 1 for the authorized reinsurers only where they are classified as fast payers or slow payers as explained above. Before we discuss how the penalty is calculated, let's consider a few items related to the determination of the 20% threshold to distinguish between fast and slow payers.

The denominator of the ratio includes not only total reinsurance recoverable on paid losses as of December 31st, but also amounts recovered on paid losses within the past 90 days. This relates the numerator (amounts overdue more than 90 days) to a quantity that somewhat represents the amount that was due 90 days ago. Therefore the denominator not only includes amounts recoverable on paid losses due as of 12/31, but amounts received in the prior 90 days which were presumably due 90 days ago. The measure is not perfect however since a payment due 60 days ago and paid by 12/31 will help increase the denominator and thus lower the ratio. Such a slight imperfection is better than omitting the adjustment altogether, of course. Another way to look at the denominator of the trigger ratio is as an attempt to give a reinsurer some credit for recent payments. This occurs because recent payments will inflate the denominator and thus lower the ratio.

It is also important to recognize that any amounts that are in dispute between cedant and reinsurer are allowed to be excluded from the amount overdue by more than 90 days,

as well as the reinsurance recoverable on paid losses. This is an attempt not to unduly penalize cedants which may have legitimate disputes with their reinsurers. We have seen evidence in the Annual Statements which we reviewed that companies have been able to lower ratios by exclusion of disputed amounts, but that would not appear to be a wide-spread practice.

The calculation of the penalty for overdue authorized reinsurance is different for fast or slow payers. For fast payers, the penalty is equal to 20% of the amounts recoverable on paid losses that are more than 90 days overdue. These amounts also may exclude any payments which are in dispute.

For slow payers, the penalty is analogous to that taken for unauthorized reinsurers. It is determined by adding unearned premiums, paid and unpaid losses recoverable, IBNR losses recoverable, and paid and unpaid allocated loss adjustment expense recoverable. From that total, a credit is taken for deposits by and funds withheld from reinsurers, as well as any miscellaneous balances. The excess is then penalized by 20%.

The total penalty for overdue authorized reinsurance (both for fast and slow payers) is brought forward to the Liabilities page of the Annual Statement on Line 13e, Page 3. That amount is included with the penalty for unauthorized reinsurers to determine a total liability provision for ceded reinsurance which is carried on Line 14.

Contrast to Unauthorized Penalty

In contrast, the penalty for unauthorized reinsurance is not segregated between fast and slow payers. The penalty is taken on the amount by which the sum of unearned premium, reinsurance recoverable on paid, unpaid, IBNR, and allocated loss expense, exceeds funds held or retained by the company for account of such unauthorized companies. A 100% penalty is taken on 100% of the excess.

D. Analysis of Annual Statement Data

In order to evaluate the impact of the Schedule F penalty for overdue authorized reinsurance and to contrast its impact to the penalty for unauthorized reinsurance, we used the information from the Annual Statements to generate various statistics as described in Exhibit D and set forth in Exhibit E. The statistics we found interesting and which shed some light on the subject were the following:

1) Penalty/Exposure for authorized and unauthorized companies, as well as combined. This statistic measures how effective the various penalties are in covering the total exposure that is eligible for a penalty. We have defined exposures eligible for a penalty as reinsurance recoverable on paid and unpaid reported losses, IBNR reserves, and unearned premiums. (Although the exposure should also properly include recoverables from paid and unpaid allocated loss adjustment expenses,

that quantity was not readily determinable for all authorized companies from information in the Statement.)

- 2) Effect on Surplus Prior to Penalty for authorized and unauthorized reinsurance, as well as combined. This statistic tells how much of the surplus which would have existed without either of the penalties, is being eroded by that penalty.
- 3) IBNR/Known for all companies, unauthorized companies, authorized companies and slow authorized companies. "Known" is defined as reinsurance recoverable on paid losses plus unpaid reported losses. This statistic is interesting since it gives us an opportunity to look at the results of company allocation of ceded IBNR to various categories of reinsurers. Since IBNR is not included in the penalty for fast authorized reinsurers but is included for slow authorized reinsurers, the study of these statistics gives a view on how IBNR is assigned to the various categories.
- 4) Percent of Penalty Eliminated by Funds Held for unauthorized versus slow authorized companies. This is tabulated as the funds held divided by the sum of losses recoverable on paid and unpaid losses, IBNR reserves, unearned premium and allocated loss adjustment expense reserves. This statistic relates to a ceding company's ability to avoid the penalty by either holding funds or being in possession of a letter of credit.

E. Observation of Statistics

Penalty/Exposure

In most instances the penalty on unauthorized business is a much higher percentage of the exposure than the penalty on authorized business. This is not too surprising given the unauthorized penalty is on the full exposure less funds held. In contrast the authorized penalty affords a lower ratio to exposure by the use of an 80% "haircut" of the otherwise determined penalty (via the 20% factor) on fast and slow payers, as well as a penalty only on the 90 day overdue amounts for the fast payers.

It is interesting to note that nine of the 35 companies sampled do not show any unauthorized entries in Schedule F, Part 1A, Section 1. However, three of the nine do show a penalty from unauthorized reinsurance on Page 3, Line 14 of the Annual Statement but do not break their data down between authorized and unauthorized. This leads to some strange results in some of our calculated ratios in Exhibit E which are denoted as "No Un". Additionally, three of the six having no unauthorized business and no unauthorized penalty have no penalty for authorized business either. The remaining three of the six show minuscule percentages of authorized penalties to exposure. One might interpret this to mean that companies which have been careful to deal only with authorized reinsurers (perhaps to avoid collectibility problems or penalties) have also been diligent in their dealing with authorized companies in avoiding penalties. It might also mean that some companies have written off certain balances and they are no longer on the books to elicit the penalty.

The observation above may also reveal that our results are being distorted by the impact of intercompany pooling. This might occur, for instance, if all companies in a group cede 100% of their direct business to a lead company and then assume back a prorata share of the total business written by the group. In this case it would appear that each company were reinsuring solely with authorized affiliates. In fact, the pooled business may be ceded to unauthorized reinsurers. However, in many cases this was not discernible since the Annual Statement of consolidated groups often does not have Schedule F completed in a way which would reveal this.

Excluding the nine companies which have no unauthorized business as shown on Schedule F, Part 1A, Section 1, we note that the results for the remaining 26 companies reveal that the penalty to exposure ratio for unauthorized companies is almost 100 times (not 100%) greater than the ratio for authorized (Exhibit E, Sheet 3, Section A). This could be interpreted as a factor of five due to the 20% multiplier on authorized and a factor of 20 as the "pure" ratio between unauthorized penalties and authorized penalties, each measured against its own exposure base. Looking at the data from a slightly different direction, there are nine companies which have no penalty on authorized reinsurers and 11 which have no penalty on unauthorized reinsurers. Four companies have no penalty on either. There are many reinsurers involved in a typical company's reinsurance program and it seems that the normal situation would be for some penalty to arise from some source. The lack of a penalty on unauthorized reinsurers was also

unexpected because of the well-known resistance of the London market companies to putting up letters of credit on IBNR.

It might be possible, for example, that a company is reporting on their reinsurance situation as of September 30 instead of December 31. In such a case they would have sufficient time to exactly match those unauthorized companies' figures with letters of credit. Another possibility is that there is a way to categorically avoid these surplus penalties through some type of financial arrangement or through a reinsurance mechanism. If these are complete and irrevocable, it would seem to avoid the problem and strengthen the insurance company's surplus position. However, if the company still retains some element of the risk or if the arrangement does not function properly under conditions of stress, then the cedant has avoided the penalty intended by the regulation while still retaining the fundamental risk of default on the asset.

Effect on Surplus Prior to Penalty

On an overall basis approximately 2% of surplus is being eroded by penalties for doubtful ceded reinsurance (both authorized and unauthorized) as shown on Exhibit E, Sheet 2. The Surplus impact of the unauthorized penalty is about 11 times greater than the authorized penalty. The magnitude of the difference is especially interesting given the previously mentioned observation that six companies have no unauthorized reinsurance and no unauthorized penalty. Obviously for these companies the effect of penalties for unauthorized reinsurance on surplus is 0%. When we exclude those six

companies from the analysis the impact of the unauthorized penalty on surplus is about 12 times greater than the authorized company penalty (Exhibit E, Sheet 3, Section B).

Of the 29 companies which do have unauthorized reinsurance in their portfolio, the impact of the penalty on surplus is higher for unauthorized business in 23 companies. For the other six companies which have unauthorized reinsurance, the impact of the penalty on surplus for authorized reinsurance is higher in four cases because there is no unauthorized penalty. Each of those four companies has been able to avoid an unauthorized penalty by holding funds for the accounts of such unauthorized companies.

IBNR/Known

When we look at all the companies in the sample, the ratio IBNR/Known does not appear to be very different for the categories of all ceded business, unauthorized business, authorized business, and slow authorized business. However, when we look at companies on an individual basis, in many instances we do see a remarkable distinction among these categories.

Ten of the 35 companies in the sample have absolutely no slow authorized reinsurance. Of the remaining 25 companies, six have a ratio of IBNR/Known which is zero for slow authorized reinsurers, 16 have slow ratios lower than all authorized ratios, and three have slow ratios higher than all authorized.

One of the simplest explanations of the low relative IBNR for slow authorized companies is that cedants may have, years ago, discontinued ceding business to companies where they have had problems collecting. Since business with these companies is in a runoff mode, the IBNR will be less since there is less business on new accident years which would contain the bulk of the IBNR.

It is understandable that companies would experience difficulty in measuring ceded IBNR by individual reinsurer, but it is also noteworthy that there is no penalty for the IBNR on the no-recoverable and fast authorized while there is on slow authorized. It might be well for the ceding companies to be particularly careful that their assignment of IBNR to individual reinsurers is as soundly based as possible and thus avoid any regulatory criticism.

Percentage of Penalty Eliminated by Funds Held

For both slow authorized and unauthorized reinsurers the penalty can be offset by crediting of funds held (or letters of credit or trust agreements). For the 21 companies which have both unauthorized and slow authorized reinsurers, 20 companies have a lower percentage of the penalty eliminated for slow authorized than unauthorized. For most of those 20 companies there is a very significant difference in the amount of the penalty eliminated. For the entire sample of companies, over 85%, of the penalty is eliminated for the unauthorized companies but under 5% is eliminated for the slow authorized (Exhibit E, Sheet 2, Total). These statistics would seem to imply that companies have not yet geared up with authorized reinsurers to take the credit available

for funds held. There may be at least three reasons for this. First, no penalties existed on authorized reinsurance until 1989, so historically funds held have never been needed to offset penalties. Treaties never needed such a contractual right before and few have that in them even today for authorized companies. Second, companies might be having some difficulties determining which of their reinsurers will be classified as fast or slow by year end. For fast payers no part of the penalty can be avoided by holding funds. Third, ceding companies may feel more comfortable with authorized reinsurers than with unauthorized reinsurers and may not feel as much of a need to hold funds even if lack of funds might trigger a Schedule F penalty. This last point may be especially true given the small impact the authorized penalty has been demonstrated to have. When companies do gear up to minimize the penalty by holding funds, we expect that the penalty for authorized reinsurance will drop.

It is also interesting to note that five companies have eliminated 100% of the penalty for unauthorized reinsurance by means of funds held. This is interesting considering that companies would have to be holding letters of credit or funds which, on each individual unauthorized company, meet or exceed the sum of the unearned premiums, reinsurance recoverable on paid and unpaid losses, IBNR reserves and allocated loss adjustment expense. For some companies the liabilities were exactly balanced by letters of credit on the majority of the reinsurers. While there may be ways to accomplish this exact matching, it would not be the norm. Companies would not reasonably be able to evaluate these liabilities until some time after year end which would not give them

enough time to set proper lines of credit on each individual account. Here again, it might be well for some special investigation to determine how this exact matching occurs and whether the reporting is really correct.

F. Implications and Concluding Remarks

The impact of the Schedule F penalties is much more in what they accomplish indirectly than what they reveal directly. The penalty has brought about a much higher degree of security in connection with unauthorized reinsurers by more or less forcing the cedant to get letters of credit or to hold funds for what would otherwise be uncollateralized receivables. With respect to authorized reinsurers, the potential of creating a penalty has encouraged reinsurers to pay more promptly. In addition, it has also encouraged the cedant to get letters of credit or funds held and thus improve the security of these receivables.

If we eliminate the one company which has an outlier value and the five companies which have absolutely no surplus penalties from Schedule F, the average penalty for the combined authorized and unauthorized reinsurance is 2.25% of Surplus (Exhibit E, Sheet 3, Section D). The direct impact of the unauthorized penalty is 2 points of the above 2.25%.

The penalty attributed to authorized reinsurers has very little effect on the financial statements of the cedants (3.01% of surplus is the maximum and it accounts for a

quarter of a point in the above 2.25%). We would expect there to be even less effect in the future as cedants invoke various means to insure prompt payment from their reinsurers (we understand that at least one cedant has included a treaty term calling for a lost interest reimbursement on late payment of recoverables) and as letters of credit or funds held on authorized companies becomes more prevalent. With 91% of the "Known" reinsurance reserves ceded being ceded to authorized companies (Exhibit E, Sheet 3, Section C), this is a large and important area to be considered. The two alternatives which suggest themselves are that the regulation be dropped for lack of impact or that it be strengthened to make it more demanding. In the latter case one could lower the trigger point at which a reinsurer is considered a slow payer (for example, from 20% to 10%) or one could raise the severity of the penalty (for example, from 20% to 40%). In any event, the impact of the present rules is so small as to question whether it is worth the cost involved.

Throughout the paper we have pointed out a number of areas in which there is a potential for problems. If the objective of the Schedule F penalties is to enhance the security of the companies being regulated, then the regulations should be scrupulously followed both in letter and in spirit. If proper means can be found with which to minimize or eliminate the impact of these penalties, that will serve to support the regulations and improve the security of the companies. However, if means are used that circumvent the intent of the regulations while not removing the risk that the asset is not recoverable, then these should be stopped.

There is also a question raised by the data on whether IBNR is being determined for all categories of reinsurers on a reasonable basis or whether, in some instances, there might be bias in that determination. If some unauthorized reinsurers categorically decline to fund IBNR or if a penalty is to be imposed if an IBNR is put against slow paying authorized reinsurers, there could be an incentive for bias.

Intra-group pooling or reinsurance arrangements may inadvertently produce results in this area of penalties which were not intended by the regulations. Clarification and strengthening of the rules for consolidating groups and for the effect of affiliated company reinsurance on the penalties may be necessary.

Effective with the 1992 Annual Statements, receivables from unauthorized reinsurers will be subject to the aging process as well as those from authorized reinsurers. They will then be subject to a 20% penalty on balances that are more than 90 days overdue and have not had funds drawn down from the letter of credit or other security. If the exhibits are carefully constructed, one should be able to identify IBNR on both authorized and unauthorized companies and simultaneously on fast payers and slow payers as well as no-recoverable reinsurers. This might be the appropriate time to raise the question of exactly how these estimates are made.

ENDNOTE

The authors would like to thank Michael J. Tempesta for contributions made in compiling and analyzing the data used in the paper.

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COMPANIES INCLUDED IN THE STUDY

Aetna Casualty and Surety Company
Allstate Insurance Company
American Home Assurance Company (AIG)
American States Insurance Company (Lincoln National)
Argonaut Insurance Company
Commercial Union Insurance Company
Continental Casualty Company

Continental Insurance Company
Farmers Insurance Exchange
Federal Insurance Company (Chubb)
Fireman's Fund Insurance Company
Fremont Compensation Insurance Company
General Reinsurance Corporation
Hartford Accident and Indemnity Company

Hartford Steam Boiler Inspection and Insurance Company Home Insurance Company Insurance Company of North America (CIGNA) Liberty Mutual Insurance Company Lumbermens Mutual Casualty Company (Kemper) Maryland Casualty Company National Indemnity Company (Berkshire Hathaway)

Nationwide Mutual Insurance Company Ohio Casualty Insurance Company Old Republic Insurance Company Reliance Insurance Company Royal Insurance Company of America SAFECO Insurance Company of America Sentry Insurance A Mutual Company

St. Paul Fire and Marine Insurance Company State Farm Mutual Automobile Insurance Company Transamerica Insurance Company Travelers Indemnity Company United Services Automobile Association United States Fire Insurance Company (Crum & Forster) United States Fidelity and Guaranty Company

NOTE: The companies have been scrambled and assigned Company Numbers for use in Exhibits C and E.

Page 3:		
Our Item	Statement	
Number	Line	Description
1	13a	Unearned premiums on reinsurance in unauthorized companies
2 3	13b	Reinsurance on paid losses
3	13b	and on unpaid reported losses
4	13b	and on incurred but not reported losses
5	13b	recoverable from unauthorized companies
6		(2)+(3)+(4)-(5) = 0?
7	13c	Paid and unpaid allocated loss adjustment expenses recoverable from unauthorized companies.
8	13d	Less funds held or retained by company for account of such unauthorized companies as per Schedule F, Part 2A, Column 6
9	13e	Provision for overdue authorized reinsurance as per Schedule F, Part 2B, Section 2
10	14	Provision for reinsurance
11		(1)+(5)+(7)-(8)+(9)-(10) = 0?
12	26	Surplus as regards policyholders

Page 10: Our Item Number 13 was Statement Line 32, Column 4c: Incurred But Not Reported - Reinsurance Ceded

Page 47 - Schedule F, Part 1A, Section 1: For each of the MAIC codes shown below, we recorded three data items: Column 1(e) Reinsurance Recoverable on Paid Losses; Column 2 Reinsurance Recoverable on Unpaid Losses; Column 3 Unearned Premiums (Estimated).

	Authorized NAIC code (our 3 entries)	Unauthorized NAIC code (our 3 entries)
Affiliates	014999 (14,15,16)	018999 (17,18,19)
U.S. insurers and U.S. branches of alien insurers	024999 (20,21,22)	028999 (23,24,25)
Pools, associations & similar underwriting facilities	034999 (26,27,28)	038999 (29,30,31)
All Other Insurers	044999 (32,33,34)	048999 (35,36,37)
TOTAL	059999 (38,39,40)

These entries were then balanced separately for each data item as follows:

41	Column	1(e)	(14)+(17)+(20)+(23)+(26)+(29)+(32)+(35)-(38) = 0?
42	Column	2	(15)+(18)+(21)+(24)+(27)+(30)+(33)+(36)-(39) = 0?
43	Column	3	(16)+(19)+(22)+(25)+(28)+(31)+(34)+(37)-(40) = 07

Page 51 - Schedule F, Part 2B, Section 1: Our Data Item 44 indicated Yes/No/Not Applicable regarding whether or not the names of companies having amounts over 90 days due were shown.

Page 51 - Schedule F, Part 2B, Section 2: Provision for Overdue Authorized Reinsurance: Our Data Items 45-52 are as follows:

Our Item	Line or	
Number	Column	Description
45	2(a)	Paid and Unpaid Losses Recoverable - TOTAL
46	2(b)	Incurred But Not Reported Losses Recoverable - TOTAL orized companies
Calculation	of Provision	for Overdue Authorized Reinsurance (at the foot of this Section)
47	(1)	Total from Column 5 of Schedule F, Part 2B, Section 1
48	(2)	Total from Column 3 of Schedule F, Part 2B, Section 2
49	(3)	Total from Column 6 of Schedule F, Part 2B, Section 2
50	(4)	Taken from the Schedule
51		(47)+(48)-(49)-(50) = 07
52		20%*(50)*(9) = 0?

Exhibit C - Sheet 1 of 8 Data Extracted from Annual Statements

Co	mpany #:	1	2	3	4	5
13a unear prem on un 13b rein on paid une 13b rein on unpaid un 13b rein on IBNR una 13b rein - pd,unpd,I Balance to	uth naut uth BNR,unauth	30,316,487 276,176,507 556,907,592 285,453,397 1,118,537,496	23,745,626 102,868,106 107,496,800 139,124,886 349,489,792 0	21,135,905 6,641,406 78,480,922 32,014,311 117,136,639 0	4,522,324 12,931,927 30,268,386 10,977,156 54,177,469 0	6,290,210 2,086,835 4,040,299 5,652,932 11,780,066 0
13c pd + unpd LAE un 13d funds held for u 13e author penalty 14-1 Total Penalty Balance to	naut	119,569,403 709,494,324 28,656,073 587,585,135 0	24,289,130 156,272,032 17,057,882 258,310,398 0	3,533,215 111,252,359 8,707,243 39,260,643 0	4,169,190 54,273,102 1,786,140 10,382,021 0	10,293,468 9,913,734 595,992 19,046,002 0
26-1 Surplus 3A-4c-32 - Ceded IBN	R	365,844,901 2,516,301,053	3,147,493,824 3,404,120,924	785,548,266 593,267,400	280,539,912 679,056,560	523,743,928 215,368,904
Authorized 014 Affiliates Unauthorized 018 Affiliates	1(e) rec on pd 2 - rec on unpd 3 - Unearned 1(e) rec on pd 2 - rec on unpd 3 - Unearned	506,328,019 0 8,734,730 5,966,480	11,248,431 1,197,547,244 586,786,593 0 0	7,436,437 246,142,259 106,177,488 3,023,340 37,369,129 1,657	0 0 0 0 0	0 512,685,772 294,952,116 0 0
Authorized 024 U.S. Companies Unauthorized 028 U.S. Companies	1(e) rec on pd 2 - rec on unpd 3 - Unearned	168,125,599 879,938,084 152,690,670 96,949,915 104,359,842 2,320,978	219,052,585 257,235,709 104,943,301 22,334,218 10,862,794 1,679,683	55,344,667 343,317,652 171,909,666 39,089,145 14,390,115 60,364	25,281,678 1,122,914,805 352,665,669 0 0	5,341,958 37,920,872 37,571,786 0 0
Authorized 034 Pools Unauthorized 038 Pools Authorized	1(e) rec on pd 2 - rec on unpd 3 - Unearned 1(e) rec on pd 2 - rec on unpd 3 - Unearned	54,587,274 277,075,905 46,007,391 12,241 12,031,929 1,146,777	97,601,583 481,647,173 17,488,889 2,656,275 1,369,313 74,845	5,089,680 40,562,940 6,203,709 1,175,282 196,321 0	0 0 0 0	244,861 5,504,713 1,266,758 0
044 All Other Unauthorized 048 All Other	1(e) rec on pd 2 - rec on unpd 3 - Unearned 1(e) rec on pd 2 - rec on unpd 3 - Unearned	28,887,624 276,681,307 4,579,775 193,749,959 461,092,014 22,477,849	87,799,665 95,264,691 21,991,095	7,575,728 50,265,709 7,241,874 17,059,251 101,484,633 22,838,193	0 0 12,931,925 30,268,386 4,522,324	0 0 2,179,545 5,448,678 6,746,420
059 TOTAL	1(e) rec on pd 2 - rec on unpd 3 - Unearned	545,258,080 3,326,199,407 741,517,939	440,692,757 2,043,926,924 732,964,406	87,293,530 814,728,758 314,432,951	38,213,603 1,153,183,191 357,187,993	7,766,363 561,560,035 340,537,081
Balance to 07	1(e) rec on pd 2 - rec on unpd 3 - Unearned	1,941 (3) 0	0 0 0	48,500,000 19,000,000 0	0 0 0	1 0 (1)
F2B1 Names? - Overdu F2B2 figures 2-a TOTAL 2-b TOTAL	e Auth Reinsurers	Yes 219,616,763 63,071,136	Yes 17,749,898 28,687,063	Yes 23,269,894 6,832,057	Yes 6,715,157 630,967	Yes 2,765,645 447
Cal (1) cul (2) ati (3) on (4) Balance to 0?		19,690,275 331,304,213 1,530,187 349,464,301 0	34,124,490 52,173,706 1,008,788 85,289,408 0	10,544,112 37,926,445 4,934,343 43,536,214	526,417 8,590,325 186,037 8,930,705	76,310 3,051,249 147,600 2,979,959 0
13e check - balance	to 07	41,236,787	0	0	1	0

Co	ompany #:	6	7	8	9	10
13a unear prem on un 13b rein on paid und 13b rein on unpaid und 13b rein on IBNR und 13b rein - pd,unpd,	auth Maut auth	69,640,005 3,219,649 313,900,445 165,797,013 482,917,107	37,978,525 16,717,916 111,976,159 68,893,301 197,587,375	151,785,507 212,095,629 657,550,000 271,758,570 1,141,404,199	25,901,544 19,143,774 59,373,145 5,087,624 83,604,543	28,269,342 4,876,270 193,777,526 155,748,569 354,402,365
Balance to	0?	0	1	0	0	0
13c pd + unpd LAE us 13d funds held for u 13e author penalty 14-1 Total Penalty Balance to	meut	21,697,454 565,503,138 629,039 9,380,467 0	12,091,384 201,088,707 842,625 47,411,203 (1)	34,448,984 1,292,898,320 1,787,643 36,528,013 0	0 88,123,741 966,049 22,348,395 0	51,365,000 416,617,936 1,550,597 18,969,368 0
26-1 Surplus 3A-4c-32 - Ceded IB	iR	289,698,108 523,428,465	1,464,588,909 459,884,348	1,140,705,925 676,089,306	767,047,086 498,969,601	697,294,573 219,769,931
Authorized 014 Affiliates Unauthorized 018	1(e) rec on pd 2 - rec on unpd 3 - Unearned 1(e) rec on pd 2 - rec on unpd	79,044 114,429,942 18,456,742 55,522 42,540,970	1,872,504 40,762,729 14,225,566 1,205,815 28,055,869	398,912,319 1,703,370,254 420,056,830 0 3,326	2,727,181 15,619,600 24,068,357 1,076,672 4,007,933	0 0 0 0
Affiliates Authorized 024 U.S. Companies Unauthorized	3 - Unearned 1(e) rec on pd 2 - rec on unpd	3,454,483 7,717,167 181,189,077 18,896,050 1,963,705	12,983,650 43,362,924 279,491,292 71,891,298 525,994	239,472 0 55,431 46,120 0	342,778 63,455,169 186,987,510 51,378,957 11,287,727	0 10,879,601 42,120,798 719,908 127,495
028 U.S. Companies Authorized 034 Pools	2 - rec on unpd 3 - Unearned 1(e) rec on pd 2 - rec on unpd 3 - Unearned	14,444,389 4,974,553 (1,695) 316,127,528 8,730,519	2,950,740 1,221,377 10,942,157 222,673,531 53,949,455	0 0 0 0	44,020,763 15,604,966 1,729,151 9,637,877 3,061,569	94,772 27,540,407 15,847,659 118,435,241 20,077,400
Unauthorized 038 Pools Authorized 044	1(e) rec on pd 2 - rec on unpd 3 - Unearned 1(e) rec on pd 2 - rec on unpd	0 0 0 71,387 19,393,310	42,029 17,920,065 4,687,954 0	0 0 0 0	0 0 0 0 4,122,151 19,081,484	5,812,520 727,517 0
All Other Unauthorized 048 All Other	3 - Unearned 1(e) rec on pd 2 · rec on unpd 3 - Unearned	3,440,615 1,200,422 256,915,086 61,210,969	0 16,516,498 61,164,770 18,763,043	0 8,293 494,466 583,199	5,344,192 6,779,375 11,344,449 9,953,800	0 4,748,775 187,870,233 1,417
059 TOTAL	1(e) rec on pd 2 - rec on unpd 3 - Unearned	11,085,552 945,040,302 119,163,931	74,467,921 653,018,996 177,722,343	398,920,612 1,703,923,477 420,925,621	91,177,426 290,699,616 109,754,618	31,603,531 354,333,564 49,066,649
Balance to 07	1(e) rec on pd 2 - rec on unpd 3 - Unearned	0 0 0	0 0 0	3,326 236,146 0	0 0 1	(1) 0 0
F2B1 Names? - Overdu F2B2 figures	e Auth Reinsurers	Unknown	Yes	Yes	Yes	Yes
2-a TOTAL 2-b TOTAL Cel (1) cul (2) ati (3) on (4)		2,056,707 1,144,785 0 3,586,650 441,454 3,145,196	3,380,585 5,310 465,053 3,748,070 0 4,213,124	13,933,180 410,992 7,718,488 17,305,773 195,878 24,828,383	3,131,804 9,000 1,305,679 3,524,903 338 4,830,244	5,512,917 839,051 1,385,013 6,367,970 0
Balance to 07		0	(1)		4,650,244	7,752,983 0
13e check - balance	to 0?	0	0	1	0	0

Exhibit C - Sheet 3 of 8

Cor	mpany #:	11	12	13	14	15
13a unear prem on una		16,265,088	7,688,849	46,892,431	13,131,644	57,915,371
13b rein on paid una		7,102,845	0	(307, 166)		58,910,080
13b rein on unpaid u		44,127,051	37,530,256	116,438,285	102,252,553	396,754,499
13b rein on IBMR una		38,197,118	21,168,000	66,473,360	21,923,469	134,178,106
13b rein - pd,unpd,II		89,427,014	58,698,256	182,604,479	193,621,107	589,842,685
Balance to (U	U	U	U	U
13c pd + unpd LAE und		4,788,646	5,520,560	19,164,146	1,628,905	38,848,094
13d funds held for ur	naut	82,129,420	71,907,664	223,198,609	146,377,880	686,606,150
13e author penalty		1,833,468	7,438,831	131,472	16,886,754	5,008,440
14-1 Total Penalty Balance to (na	30,184,796	7,438,832	25,593,919	78,890,530	5,008,440
batare to	01	•	· ·	· ·	·	·
26-1 Surplus		1,404,631,855	390,134,500	1,420,474,446	4,710,310,758	409,117,694
3A-4c-32 - Ceded IBNI	R	1,062,616,465	126,844,306	1,411,446,074	292,436,257	1,773,222,926
Authorized	1(e) rec on pd	(29,703)	0	3,401,198	0	52,845,880
014	2 - rec on unpd	289,045,160	43,022,345	759,780,735	0	2,783,732,008
Affiliates	3 - Unearned	316,088,784	0	355,500,167	0	1,215,444,437
Unauthorized	1(e) rec on pd	0	0	. 0	0	19,460,393
018	2 - rec on unpd	24,641	3,929,322	0	99,229	253,691,953
Affiliates	3 - Unearned	0	0	0	38,846	33,163,658
Authorized	1(e) rec on pd	12,869,949	11,798,445	32,408,717	31,397,434	153,694,927
024	2 - rec on unpd	224,918,282	54,534,762	239,580,803	127,691,049	481,805,054
U.S. Companies	3 - Unearned	199,688,851	678,742	192,988,088	47, <i>9</i> 37,255	51,428,650
Unauthorized	1(e) rec on pd	63,846	4,030,721	596,073	5,281,326	55,431
028	2 - rec on unpd	1,486,168	6,809,410	4,705,352	4,352,166	13,458,270
U.S. Companies		1,195,825	141,226	3,363,165	147,648	7,344,364
Authorized	1(e) rec on pd	822,428	1,108,315	102,658,923	2,891,498	103,204,015
034	2 - rec on unpd	102,822,531	7,812,758	418,074,592	306,437,975	523,022,328
Pools	3 - Unearned	14,715,950	152,312	68,456,503	26,530,385	171,755,891
Unauthorized	1(e) rec on pd	615,729	0	(12,559)	1,593,032	0
038	2 - rec on unpd	21,015,281	Ō	22,976,429	4,856,673	0
Pools	3 - Unearned	3,468,382	Ō	8,421,603	9,962,454	0
Authorized	1(e) rec on pd	1,479,869	0	30,458,036	9,247,165	546,964
044	2 - rec on unpd	4,961,502	0	109,291,969	23,371,704	1,097,627
All Other	3 - Unearned	2,216,474	0	13,059,334	1,461,944	94,685
Unauthorized	1(e) rec on pd	6,423,270	(2,194,628)	(890,680)	62,570,727	39,394,256
048	2 - rec on unpd	21,600,961	24,955,432	88,756,504	92,944,486	129,604,276
All Other	3 - Unearned	11,600,881	7,547,623	35,107,663	2,982,696	17,407,349
	1(e) rec on pd	22,245,388	14,742,854	168,619,707	112,981,183	369,201,866
059 TOTAL	2 - rec on unpd	665,874,526	141,064,029	1,643,166,383	559,753,281	4,186,411,516
	3 - Unearned	548,975,147	8,519,903	676,896,524	89,061,229	1,496,639,034
	1(e) rec on pd	0	(1)	1	(1)	0
Balance to 07	2 - rec on unpd	0	0	1	1	0
	3 - Unearned	0	0	(1)	(1)	0
F2B1 Names? - Overdue	e Auth Reinsurers	Yes	Yes	Yes	No	Yes
F2B2 figures						
2-a TOTAL		338,949	25,766,154	0	73,592,308	81,059,169
2-b TOTAL		504,143	10,912,000	0	4,370,026	4,368,229
Cal (1)		1,752,924	540,516	657,358	1,214,186	3,671,685
cul (2)		7,590,025	41,883,706	Ō	88,014,807	22,398,655
ati (3)		175,606	5,230,068	0	4,795,225	1,028,138
on (4)		9,167,343	37, 194, 154	657,358	84,433,768	25,042,202
Balance to 07		0	0	0	0	0
13e check - balance 1	to 0?	1	0	0	0	0

Exhibit C - Sheet 4 of 8

Сотра	any #:	16	17	18	19	20
13a unear prem on unaut 13b rein on paid unauth 13b rein on unpaid unau 13b rein on IBMR unauth 13b rein - pd,unpd,IBMR Balance to 07	h ut h	6,766,342 11,349,371 29,657,346 7,253,427 48,260,144 0	2,045,403 1,734,758 75,654,862 46,091,851 123,481,471 0	603,620 0 1,583,831 0 1,583,831	66,002 0 2,367,777 839,281 3,207,058 0	574,082 899,264 6,691,652 111,793,716 119,384,632 0
13c pd + unpd LAE unaut 13d funds held for unau 13e author penalty 14-1 Total Penalty Balance to 0?		352,842 42,635,085 226,925 12,971,168 0	4,866,820 121,716,449 55,228 8,732,473 0	959,234 0 1,228,217 0	149,934 1,084,567 0 2,338,427 0	334,582 119,305,036 0 988,261 (1)
26-1 Surplus 3A-4c-32 - Ceded IBNR		2,604,044,897 850,789,155	2,132,574,169 633,512,998	313,575,213 0	619,962,965 2,116,637,446	267,256,090 624,539,246
014 2 Affiliates 3 Unauthorized 16 018 2 Affiliates 3 Authorized 16 024 2 U.S. Companies 3 Unauthorized 16 028 2 U.S. Companies 3 Authorized 10 034 2 Pools 3 Unauthorized 16 038 3 Authorized 16 038 4 Pools 3 Authorized 16 038 4 Authorized 17 038 5 Authorized 17 038 6 038 6 038 6 038 7 044 10 044 10 048 12 048 12 048 12 048 12 049 15	(e) rec on pd - rec on unpd	524,458,191 0 0 17,010,557 325,015,101 15,007,851 0 0 26,150,991 56,328,473 24,799,783 0 0 0 0 0 0 0 0 0 43,898,017	(18,885,159) 1,028,784,763 22,420,556 0 0 0 864,548 12,764,051 4,960,430 5590,640 2,368,241 559,622 291,822,882 1,735,771,939 291,982,160 35,747 8,523,056 809,963 0 4,527,935 23,161 1,225,968 9,547,299 117,003 275,654,426 2,802,287,284	0 0 0 0 338,322 0 16,250,125 1,334,463 0 5,709 14,127 0 5,176,195 447,466 0 0 0 157,870 445,958 0 1,578,122 251,171		(33,275,954) 426,441,078 240,685,483 0 0 63,682,796 246,451,582 6,715,188 432,110 3,651,827 161,95 47,520,391 311,214,048 104,210,713 0 0 3,313,568 3,222,261 318,816 1,233,194 8,740,122 901,720 82,906,105 999,720,918 352,993,315
Balance to 0? 2	(e) rec on pd - rec on unpd - Unearned	0 0 0	0 0 0	0 0 0	0 0	0
F2B1 Names? - Overdue A F2B2 figures 2-a TOTAL 2-b TOTAL Cal (1) cul (2) ati (3) cn (4) Balance to 07		Yes 5,429,059 0 60,128 5,448,567 4,374,069 1,134,626 0	Yes 263,600 0 127 276,013 0 276,140 0	Yes Entire Part 2B Section 2 has no entries 0	Yes Entire Part 2B Section 2 has no entries 0	Yes 14,057,253 207,025,400 0 0 0 0 0

Exhibit C - Sheet 5 of 8 Data Extracted from Annual Statements

Company #:	21	22	23	24	25
13a unear prem on unauth 13b rein on paid unauth 13b rein on urpaid unaut 13b rein on IBNR unauth 13b rein - pd,unpd,IBNR,unau Balance to 07	41,556,398 9,135,532 93,026,493 16,345,133 th 118,507,158	718,076 868,402 9,342,829 2,112,660 12,323,891 0	0 0 0 0 0	10,902,231 10,555,813 60,937,091 122,691,933 194,184,837	66,963,424 1,335,342 89,690,313 36,447,621 127,473,276 0
13c pd + unpd LAE unauth 13d funds held for unaut 13e author penalty 14-1 Total Penalty Balance to 07	14,464,897 172,328,110 72,324 2,272,667 0	506,775 12,586,039 166,482 1,129,185 0	0 0 3,114,780 3,114,780 0	7,911,311 212,998,379 2,908,417 2,908,417	11,475,605 205,412,822 203,098 702,581 0
26-1 Surplus 3A-4c-32 - Ceded IBNR	1,313,263,860 204,712,841	657,863,908 244,935,256	2,513,486,716 3,122,868,171	2,779,467,936 429,475,952	817,072,312 559,401,349
014 2 - rec Affiliates 3 - Une Unauthorized 1(e) re	c on pd 173,119 on unpd 404,318	13,534 233,274,179 206 0 0	3,661,549 1,219,206,482 448,255,185 0 0	4,240,704 2,966,156 1,914,151 105,527 2,650,186 36,196	24,603 124,504,427 70,009,301 0
Authorized 1(e) re 024 2 - rec U.S. Companies 3 - Une Unauthorized 1(e) re 028 2 - rec	c on pd 4,101,699 on unpd 52,020,909 arned 10,561,108 c on pd 1,020,671 on unpd 8,176,246	4,189,501 34,062,166 1,526,858 11,036,074 3,204,890	135,948,736 157,718,224 60,547,207 0	11,664,684 97,090,911 11,080,238 0	4,959,138 145,305,100 96,642,980 0
034 2 - rec Pools 3 - Une Unauthorized 1(e) re	c on pd 30,304,325 on unpd 222,309,986	546,746 3,171,613 145,466 0	0 158,940,638 901,291,046 268,216,236 0	0 0 0 0	242,419 30,858,068 6,689,234 0
044 2 - rec All Other 3 - Une Unauthorized 1(e) re 048 2 - rec	c on pd 0 on unpd 0 arned 0 c on pd 10,670,537 on unpd 112,233,063	0 111,336 140,119 0 (10,667,672) 6,137,936	37,312,128 106,164,605 25,894,623 0	0 0 0 10,450,287 58,286,905	0 1,664,443 98,169,406 60,977,756 0 0
	c on pd 36,184,068 on unpd 1,104,392,477	718,076 5,229,519 279,990,903 2,390,606	335,863,052 2,384,380,359 802,913,254	10,866,035 26,460,211 146,573,158 23,913,022	6,147,942 399,738,020 234,319,281
*	c on pd 10,808,228 on unpd (694,412,177) arned (270,331,982)	0 0 0	(1) (2) (3)	14,421,000	742,661 (901,019) (10)
F2B1 Names? - Overdue Auth R F2B2 figures	einsurers Yes	Yes	Yes	Yes	Yes
2-a TOTÂL 2-b TOTAL Cal (1) cul (2) ati (3) on (4)	274,724 0 50,376 311,222 0 361,618	694,411 0 0 832,410 0 832,410	3,568,469 6,557,010 4,857,165 12,369,865 1,653,132 15,573,899	23,033,482 14,338,097 339,144 41,374,161 619,364 41,093,941	653,548 18,579 381,006 960,716 326,232 1,015,490
Balance to 0? 13e check - balance to 0?	0	0	0	0 5,310,371	0

Exhibit C - Sheet 6 of 8

Co	mpany #:	26	27	28	29	30
13a unear prem on un 13b rein on paid una 13b rein on unpaid una 13b rein on IBNR una 13b rein - pd,unpd,I Balance to	uth neut uth BNR,unauth	83,145 364,984 0 448,129	0 419,412 534,229 71,566 1,025,207 0	0 0 0 0 0	0 123,085 3,269,622 0 3,392,707	0 (868,736) 1,740,525 0 871,789
13c pd + unpd LAE un 13d funds held for u 13e author penalty 14-1 Total Penalty Balance to	naut	0 16,766 4,559 435,922 0	42,054 466,728 0 600,533 0	0 0 254,203 254,203 0	244,714 3,637,421 8,130 8,130	51,143 919,952 0 2,980
26-1 Surplus 3A-4c-32 - Ceded IBN	R	852,144,308 246,222,300	2,739,861,426 4,256,476	2,072,410,069 1,560,241,067	91,903,408 551,320	1,544,166,645 948,076,887
Authorized 014 Affiliates Unauthorized 018	1(e) rec on pd 2 - rec on unpd 3 - Unearned 1(e) rec on pd 2 - rec on unpd	912 430,755,115 341,522,033 0 0	0 0 0 0	(3,092,145) 2,108,503,888 1,747,082 0	0 0 0 115,722	0 670,693,749 772,015,978 0 0
Affiliates Authorized 024 U.S. Companies Unauthorized 028	1(e) rec on pd 2 - rec on unpd	3,828,919 81,506,031 2,604,609 54,359 332,257	1,427,497 5,768,580 4,125,970 7,091 7,324	42,250,639 161,973,008 46,891,660 0	609,879 26,785,831 0 83,136 901,370	353,878 2,419,114 0 0
U.S. Companies Authorized 034 Pools Unauthorized 038	1(e) rec on pd 2 - rec on unpd 3 - Unearned 1(e) rec on pd 2 - rec on unpd	2,439,708 16,682,606 1,592,633 0	0 4,033,863 14,950,497 512,553 0 0	0 111,026,012 2,112,175,488 387,570,308 0	0 0 0 0 0	(705,515) 33,936,125 0 0
Pools Authorized 044 All Other Unauthorized 048 All Other	3 - Unearned 1(e) rec on pd 2 - rec on unpd 3 - Unearned 1(e) rec on pd 2 - rec on unpd 3 - Unearned	0 0 0 0 28,787 32,726	0 326,104 551,955 0 412,321 526,905	0 60,890,726 206,885,872 14,711,146 0 0	0 0 23,592 0 39,949 2,252,530	(919,818) 1,575,632 0 0
059 TOTAL	1(e) rec on pd 2 - rec on unpd 3 - Unearned	6,352,685 529,308,735 345,719,275	6,206,876 21,805,261 4,638,523	211,075,232 4,589,538,256 450,920,196	732,964 30,079,045 0	(1,271,455) 708,624,621 772,015,978
Balance to 0?	1(e) rec on pd 2 - rec on unpd 3 - Unearned	0 0 0	0 0 0	0 0 0	0 0 0	(1) 0
F2B1 Names7 - Overdu F2B2 figures	e Auth Reinsurers	Yes	Yes	Yes	Yes	Yes
2-a TOTAL 2-b TOTAL Cal (1) cul (2) ati (3) on (4)		0 0 22,797 0 0	Entire Part 2B Section 2 has no entries	778,760 122,533 470,033 901,293 100,302	36,168 0 0 41,567 918	Entire Part 2B Section 2 has no
Balance to 07		22,797 0	entries 0	1,271,024 0	40,649 0	entries O
13e check - belance	to 07	0	0	2	0	0

Exhibit C - Sheet 7 of 8 Data Extracted from Annual Statements

Cor	mpany #:	31	32	33	34	35
13a unear prem on un	nuth	0	0	0	28,166,838	0
13b rein on paid una		ŏ	ŏ	ŏ	1,496,748	ŏ
13b rein on unpaid u		Ŏ	Ŏ	Ŏ	982,390,297	ŏ
13b rein on IBNR una		Ó	Ō	Ō	81,264,092	0
13b rein - pd,unpd,ii	BNR, unauth	0	0	0	1,065,151,137	0
Balance to		0	0	0	0	0
		_	_	_		_
13c pd + unpd LAE un		0	0	0	688,662	0
13d funds held for u	naut	7 170	0	0	1,094,006,637	0
13e author penalty		7,138	0	0	Ü	0
14-1 Total Penalty Balance to	09	7,138 0	0	Ö	ŏ	0
betwee to	••	·	·	•	·	•
26-1 Surplus		3,871,056,785	465,821,164	17,889,083,301	1,352,196,471	592,608,887
3A-4c-32 - Ceded IBN	R	84,140,054	117,966,824	57,609,027	231,074,370	1,435,888,226
444	44-5	1 /05 1/5	•	•	n	•
Authorized 014	1(e) rec on pd	1,405,165	493,060,681	0	Ů	1,608,805,960
Affiliates	2 - rec on unpd 3 - Unearned	419,819,935 3,970,707	308,454,986	0	179,124,817	65,084,040
Unauthorized	1(e) rec on pd	3,910,101	J00,4J4,700 N	ŏ	177,124,017	0,004,040
018	2 · rec on unpd	Ď	ŏ	ŏ	930,749,117	ŏ
Affiliates	3 - Unearned	ŏ	ŏ	ŏ	27,636,230	ŏ
Authorized	1(e) rec on pd	40,290	8,570,608	Ō	3,841,598	Ó
024	2 - rec on unpd	6,331,443	28,036,190	0	62,501,719	0
U.S. Companies	3 - Unearned	241,386	1,525,507	0	18,697,166	0
Unauthorized	1(e) rec on pd	0	0	0	79,923	0
028	2 - rec on unpd	0	0	0	778,881	0
U.S. Companies		. 0	0	0	48,392	0
Authorized	1(e) rec on pd	18,134	739,705	30,675,570	18,515,960	0
034	2 - rec on unpd	913,736	2,641,156	512,838,536	1,016,963,082	0
Pools Unauthorized	3 - Unearned	0	1,132,671 0	31,889,943	127,262,786 1,097,860	ŏ
038	1(e) rec on pd 2 - rec on unpd	ŏ	ŏ	Ö	27,510,688	ň
Pools	3 - Unearned	ő	ŏ	ŏ	305,007	0
Authorized	1(e) rec on pd	11,646	2,164	Ŏ	184,468	Ŏ
044	2 - rec on unpd	256,285	23,695	Ō	2,921,067	0
All Other	3 - Unearned	0	81,577	0	732,696	0
Unauthorized	1(e) rec on pd	0	0	0	318,965	0
048	2 - rec on unpd	Ō	0	Ō	23,351,611	0
All Other	3 - Unearned	0	0	0	177,209	0
	1(e) rec on pd	1,475,235	9,312,478	30,675,570	24,038,774	0
059 TOTAL	2 - rec on unpd	427,321,399	523,761,722	512,838,536	2,064,776,165	1,608,805,960
os, ioine	3 - Unearned	4,212,093	311, 194,740	31,889,943	353,984,303	65,084,040
			• •	• •		
	1(e) rec on pd	Ō	(1)		Ō	0
Balance to 07	2 - rec on unpd	0	0	0	0	0
	3 - Unearned	0	1	0	0	0
F2B1 Names? - Overdu F2B2 figures	e Auth Reinsurers	Yes	N/A	Yes	Yes	Yes
2-a TOTAL		35,689	Entire	0	Entire	Entire
2-b TOTAL		0	Part 2B	ō	Part 28	Part 28
Cal (1)		Ŏ	Section 2	Ō	Section 2	Section 2
cul (2)		35,689	has	0	has	has
ati (3)		0	no	0	no	no
on (4)		35,689	entries	. 0	entries	entries
Balance to 07		0	(0 0	0	0
13e check - balance	to 0?	0	ı	0	0	0

		Total
		35 Companies
13a unear prem on ur	nauth	699,841,274
13b rein on paid una	uth	829,040,999
13b rein on unpaid u	naut	4,168,125,769
13b rein on IBNR une	uth	4,168,125,769 1,847,359,092
13b rein - pd,unpd,I		6,844,525,859
Balance to		N/A
13c pd + unpd LAE un	wuth	392,496,918
13d funds held for u	naut	6,803,730,341
13d funds held for u 13e author penalty		100,899,532
14-1 Total Penalty		1,234,033,244
Balance to	0?	N/A
26-1 Surplus		63,286,995,215
3A-4c-32 - Ceded IBN	1D	27,925,721,485
SA-4C-32 - Ceded 1BR	:K	21,723,721,403
Authorized	1(e) rec on pd	436,992,323
014	2 - rec on unpd	22,649,053,982
Affiliates	3 - Unearned	7,977,994,156
Unauthorized	1(e) rec on pd	25,100,388
018	2 - rec on unpd	1,312,379,998
Affiliates	3 - Unearned	85,380,892
Authorized	1(e) rec on pd	1,144,075,787
024	2 - rec on unpol	5,929,644,945
U.S. Companies		1,737,939,636
Unauthor i zed	1(e) rec on pd	195,609,400
028	2 - rec on unpd	241,979,088
U.S. Companies		70,107,064
Authorized	1(e) rec on pd	1,118,997,678
034	2 - rec on unpol	10,344,708,870
Pools	3 - Unearned	1,826,618,685
Unauthorized	1(e) rec on pd	7,215,636
038_	2 · rec on unpd	122,212,275
Pools	3 - Unearned	29,604,502
Authorized	1(e) rec on pd	185,285,689
044	2 - rec on unpd	928,962,306
All Other	3 - Unearned	140,624,681
Unauthorized	1(e) rec on pd	461,988,989
048	2 - rec on unpd	1,793,642,946
All Other	3 - Unearned	305,892,993
	1(e) rec on pd	3,515,212,072
059 TOTAL	2 - rec on unpol	43,984,476,610
	3 - Unearned	12,444,511,007
	1(e) rec on pd	N/A
Balance to 0?	2 - rec on unpd	N/A
	3 - Unearned	N/A
F281 Names? - Overdu	e Auth Reinsurers	N/A
F2B2 figures		F07 744 655
2-a TOTAL		527,714,293
2-b TOTAL		349,846,825
Cal (1)		89,853,282
cul (2)		690,018,020
ati (3)		26,747,679
on (4)		753,123,625
Balance to 0?		N/A
13e check - balance	to 07	N/A

Calculations Performed on Data Items Extracted from Annual Statements

Given the basic data items of Exhibit C, the following calculations were performed:

<u>item</u>	DESCRIPTION	FORMULA
	Penalty/Exposure for:	
a	Authorized reinsurers	(9)/((14)+(15)+(16)+(20)+(21)+(22)+(26)+(27)+(28) +(32)+(33)+(34)+(13)-(4))
ь	Unauthorized reinsurers	((10)-(9))/((17)+(18)+(19)+(23)+(24)+(25)+(29)+(30) +(31)+(35)+(36)+(37)+(4))
c	Combined all reinsurers	(10)/((38)+(39)+(40)+(13))
	Effect on Surplus Prior To Penalty of the:	
ď	Authorized reinsurers penalty	(9)/((10)+(12))
е	Unauthorized reinsurers' penalty	((10)-(9))/((10)+(12))
f	Combined effect	(10)/((10)+(12)) = (d)+(e)
	Known³ reserves on:	
a	Authorized reinsurers	(14)+(15)+(20)+(21)+(26)+(27)+(32)+(33)
9 h	Unauthorized reinsurers	(17)+(18)+(23)+(24)+(29)+(30)+(35)+(36)
i	Known X Authorized	(g)/((g)+(h))
j	IBNR on Authorized	(13)-(4)
k	IBNR on Fast Pay Authorized	(13)-(4)-(46)
	IBNR/Known for:	
ι	All Ceded	(13)/((38)+(39))
m	Unauthorized	(4)/(h)
n	Authorized	(j)/(g)
0	Slow Pay Authorized	(46)/(45)
	Percentage of Penalty Eliminated by Funds Held:	
Р	Unauthorized	(8)/((1)+(5)+(7)
q	Slow Pay Authorized	(49)/(48)

FOOTNOTES

 $^{^{1}}$ "Exposure" means recoverables on paid and unpaid losses, IBNR, and unearned premium.

² "Surplus Prior to Penalty" is surplus plus total penalty.

 $^{^{\}scriptsize 1}$ "Known" means known outstanding loss reserves plus recoverables on paid losses.

Calculated Statistics from Data in Exhibit C (dollar figures are /100000)

Company #:	1	2	3	4	5	6	7	8	9	10
Penal ty/Exposure ¹										
Authorized	0.48%	0.27%	0.54%	0.08%	0.05%	0.06%	0.07%	0.06%	0.11%	0.57%
Unauthorized	46.80%	62.96%	11.37%	14.64%	92.12%	1.58%	19.82%	12.72%	19.53%	4.55%
Combined	8.24%	3.90%	2.17%	0.47%	1.69%	0.59%	3.47%	1.14%	2.26%	2.90%
Effect on Surplus ²										
Authorized	3.01%	0.50%	1.06%	0.61%	0.11%	0.21%	0.06%	0.15%	0.12%	0.22%
Unauthorized	58.62%	7.08%	3.70%	2.95%	3.40%	2.93%	3.08%	2.95%	2.71%	2.43%
Combined	61.63%	7.58%	4.76%	3.57%	3.51%	3.14%	3.14%	3.10%	2.83%	2.65%
Known ³										
Authorized	29,945	22,643	7,557	11,482	5,617	6,390	5,991	21,023	3,034	1,873
Unauthorized	8,769	2,203	2,138	432	76	3,171	1,284	7	785	1,987
Known % Authorized	77%	91%	78%	96%	99%	67%	82%	100%	79%	49%
IBNR on Authorized	22,308	32,650	5,613	6,681	2,097	3,576	3,910	4,043	4,939	640
IBNR on Fast Pay	21,678	32,363	5,544	6,674	2,097	3,565	3,910	4,039	4,939	632
IBNR/Known for:	•	•	•	·	•		•	-	-	
All Ceded	65.00%	137.01%	65.77%	57.00%	37.83%	54.74%	63.22%	32.15%	130.66%	56.94%
Unauthorized	32.55%	63.16%	14.97%	25.41%	74.11%	52.28%	53.66%	>1000%	6.48%	78.40%
Authorized	74.50%	144.19%	74.27%	58.19%	37.34%	55.97%	65.26%	19.23%	162.80%	34.18%
Slow Authorized	28.72%	161.62%	29.36%	9.40%	0.02%	55.66%	0.16%	2.95%	0.29%	15.22%
% Penalty Eliminate	d							-		
by Funds Held:										
Unauthorized	55.94%	39.31%	78.45%	86.33%	34.95%	98.48%	81.20%	97.38%	80.47%	95.99%
Slow Authorized	0.46%	1.93%	13.01%	2.17%	4.84%	12.31%	0.00%	1.13%	0.01%	0.00%
	*****	,,,,,,,			******		0.00%	*****		
Company #:	11	12	13	14	15	16	17	18	19	20
Penal ty/Exposure										
Authorized	0.08%	3.31%	0.00%	1.99%	0.07%	0.01%	0.00%	0.00%	0.00%	0.00%
Unauthorized	26.82%	0.00%	11.09%	29.99%	0.00%	175.70%	12.42%	56.15%	71.44%	0.78%
Combined	1.31%	2.55%	0.66%	7.48%	0.06%	0.44%	0.22%	4.72%	0.03%	0.05%
Effect on Surplus?										
Authorized	0.13%	1.87%	0.01%	0.35%	1.21%	0.01%	0.00%	0.00%	0.00%	0.00%
Unauthorized	1.98%	0.00%	1.76%	1.29%	0.00%	0.49%	0.41%	0.39%	0.38%	0.37%
Combined	2.10%	1.87%	1.77%	1.65%	1.21%	0.50%	0.41%	0.39%	0.38%	0.37%
Kno⊌n³										
Authorized	6,369	1,183	16,957	5,010	40,999	15,040	30,557	216	43,221	10,686
Unauthorized	512	375	1,161	1,717	4,557	0	223	16	24	141
Known % Authorized	93%	76 %	94%	74%	90%	100%	99%	93%	100%	99%
IBNR on Authorized	10,244	1,057	13,450	2,705	16,390	8,435	5,874	0	21,158	5,127
IBNR on Fast Pay	10,239	948	13,450	2,661	16,347	8,435	5,874	0	21,158	3,057
IBNR/Known for:	•		•	-•	•	•				
All Ceded	154.42%	81.41%	77.90%	43.47%	38.92%	56.57%	20.58%	0.00%	48.95%	57.69%
Unauthorized	74.56%	56.40%	57.24%	12.77%	29.45%	No Un	206.78%	0.00%	35.45%	795.27%
Authorized	160.85%	89.35%	79.32%	53.99%	39.98%	56.09%	19.22%	0.00%	48.95%	47.98%
Slow Authorized	148.74%	42.35%	No Slo	5.94%	5.39%	0.00%	0.00%	No Sto	No Slo	1472.73%
% Penalty Eliminated										
by Funds Held:										
Unauthorized	74.34%	100.00%	89.76%	70.25%	100.00%	76.99%	93.35%	43.85%	31.68%	99.18%
Slow Authorized	2.31%	12.49%	No Odu	5.45%	4,59%	80.28%	0.00%	No Odu	No Odu	No Odu
2100 1100					7.2.7		0.004			

FOOTNOTES

 $^{^{1}}$ "Exposure" means recoverables on paid and unpaid losses, IBNR, and unearned premium.

² "Surplus" is the Surplus Prior to Penalty; that is, surplus plus total penalty.

³ "Known" means known outstanding loss reserves plus recoverables on paid losses.

No Un means no unauthorized reinsurer data in Schedule F Part 1A Section 2.

No Slo means no paid and unpaid losses recoverable for slow pay authorized companies.

No Odu means no "Exposure" for overdue authorized companies.

Calculated Statistics from Data in Exhibit C (dollar figures are /100000)

Company #:	21	22	23	24	25	26	27	28	29	30
Penalty/Exposure'										
Authorized	0.01%	0.03%	0.05%	0.67%	0.02%	0.00%	0.00%	0.00%	0.03%	0.00%
Unauthorized	1.08%	7.68%	No Un	0.00%	1.37%	96.26X	58.58%	No Un	0.00%	No Un
Combined	0.13%	0.21%	0.05%	0.46%	0.06%	0.04%	1.63%	0.00%	0.03%	0.00%
Effect on Surplus ²										
Authorized	0.01%	0.03%	0.12%	0.10%	0.02%	0.00%	0.00%	0.01%	0.01%	0.00%
Unauthorized	0.17%	0.15%	0.00%	0.00%	0.06%	0.05%	0.02%	0.00%	0.00%	0.00%
Combined	0.17%	0.17%	0.12%	0.10%	0.09%	0.05%	0.02%	0.01%	0.01%	0.00%
Known'										
Authorized	3,243	2,755	27,202	1,160	4,057	5,352	271	48,006	274	7,074
Unauthorized	1,327	97	0	715	0	4	10	0	34	0
Known % Authorized	71%	97%	100%	62%	100%	100%	97%	100%	89%	100%
IBNR on Authorized	1,884	2,428	31,229	3,068	5,230	2,462	42	15,602	6	9,481
IBNR on Fast Pay	1,884	2,428	31,163	2,924	5,229	2,462	42	15,601	6	9,481
IBKR/Known for:			•		•	•				
All Ceded	17.95%	85.88%	114.80%	248.20%	137.82%	45.97%	15.20%	32.50%	1.79%	134.03%
Unauthorized	12.32%	21.75%	No Un	171.61%	No Un	0.00%	7.50%	No Un	0.00%	No Un
Authorized	58.09%	88.14%	114.80%	264.55%	128.89%	46.00%	15.47%	32.50%	2.01%	134.03%
Slow Authorized	0.00%	0.00%	183.75%	62.25%	2.84%	No Slo	No Slo	15.73%	0.00%	No Sto
% Penalty Eliminated										
by Funds Held:										
Unauthorized	98.74%	92.89%	No Un	100.00%	99.76%	3.74%	43.73%	No Un	100.00%	99.68%
Slow Authorized	0.00%	0.00%	13.36%	1.50%	33.96%	No Odu	No Odu	11.13%	2.21%	No Odu
oron marilor recu	0.00%	0.002	13.304		33.742	NO 000		111154	21214	540
Company #:	31	32	33	34	35	TOTAL				
Penalty/Exposure										
Authorized	0.00%	0.00%	0.00%	0.00%	0.00%	0.13%				
Unauthorized	No Un	No Un	No Un	0.00%	No Un	17.44%				
Combined	0.00%	0.00%	0.00%	0.00%	0.00%	1.40%				
Effect on Surplus ^z										
Authorized	0.00%	0.00%	0.00%	0.00%	0.00%	0.16%				
Unauthor i zed	0.00%	0.00%	0.00%	0.00%	0.00%	1.76%				
Combined	0.00%	0.00%	0.00%	0.00%	0.00%	1.91%				
Known ³										
Authorized	4,288	5,331	5,435	11,049	16,088	427,377				
Unauthorized	0	. 0	0	9,839	0	41,601				
Known % Authorized	100%	100%	100%	53%	100%	91%				
IBNR on Authorized	841	1,180	576	1,498	14,359	260,784				
IBNR on Fast Pay	841	1,180	576	1,498	14,359	257,285				
IBNR/Known for:		•		•	•	•				
All Ceded	19.62%	22.13%	10.60%	11.06%	89.25%	58.79%				
Unauthorized	No Un	No Un	No Un	8.26%	No Un	43.36%				
Authorized	19.62%	22.13%	10.60%	13.56%	89.25%	61.02%				
Slow Authorized	0.00%	No Slo	No Slo	No Slo	No Slo	66.29%				
% Penalty Eliminated		NO 510	NO 010		NO 010	۵.2/4				
by Funds Held:	•									
Unauthorized	No Un	No Un	No Un	100.00%	No Un	85.72%				
Slow-Authorized	0.00%	No Odu	No Octu	No Octu	No Odu	3.88%				
STOM-MUTHOLISED	0.004	NO COL	NO UGU	WO 000	NO 000	J.00A				

FOOTNOTES

^{1 &}quot;Exposure" means recoverables on paid and unpaid losses, IBNR, and unearned premium.

² "Surplus" Prior to Penalty is surplus plus total penalty.

^{3 &}quot;Known" means known outstanding loss reserves plus recoverables on paid losses.

No Un means no unauthorized reinsurer data in Schedule F Part 1A Section 2.

No Sto means no paid and unpaid tosses recoverable for stow pay authorized companies.

No Odu means no "Exposure" for overdue authorized companies.

Calculated Statistics from Data in Exhibit C SPECIAL COMPILATIONS (dollar figures are /100000)

A. Excluding the Nine Companies Which Have No Unauthorized Business in F1A1.

Penal ty/Exposure

Authorized 0.18% Unauthorized 17.35% Combined 1.94%

B. Excluding the Six Companies Which Have No Unauthorized Penalty

Effect on Surplus

Authorized 0.26% Unauthorized 3.05% Combined 3.32%

C. Excluding the Three Companies Which Have No Unauthorized Business in F1A1 but do Nave an Unauthorized Penalty

Known

Authorized 401,210 Unauthorized 41,601 Known % Authorized 91%

D. If one eliminates Company #1 as an outlier and Companies #31-35 which have no Surplus penalties at all:

Effect on Surplus

Authorized 0.24% Unauthorized 2.01% Combined 2.25%