

The Insurance Federation of Pennsylvania, Inc.

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October 5, 1998

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Richard A. Himler, Director
 Bureau of Workers Compensation
 Department of Labor and Industry
 P.O. Box 15121
 Harrisburg, PA 17105-5121

Re: Proposed Rulemaking - 34 Pa. Code Chapter 121 -
 Special funds assessments

Dear Mr. Himler:

The Insurance Federation and our national trade counterparts endorse the goals in the Bureau's proposed revisions to Chapter 121. We recommend that the Bureau incorporate the clarifications in the comments of Pennsylvania Compensation and Coal Mine Compensation Rating Bureaus as better achieving those goals.

As noted in those comments, the Bureaus have worked with insurers (and the Bureau) in developing these clarifications. They are a practical way to achieve the goal of Act 57 of 1997 - switching the funding of the special funds from assessments on insurers to surcharges on employers remitted through insurers - while still ensuring an efficient means of collecting these funds and maintaining an accurate rate structure for the underlying workers compensation coverage.

I thank you and your team for your continued efforts on this. We look forward to working with you in reviewing and, I hope, implementing these clarifications.

Sincerely,

Samuel Marshall

Samuel R. Marshall

c: Robert Nyce, Executive Director
 Independent Regulatory Review Commission

