

The Insurance Federation of Pennsylvania, Inc.

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333 Market Street
Harrisburg, PA 17101

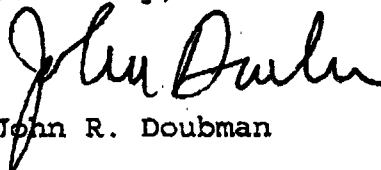
**Re: Regulation 11-170 - Insurance Department's
Surplus Lines Regulation**

Dear Mr. Nyce:

The Insurance Federation supports the captioned final form regulation of the Insurance Department to be considered by the Independent Regulatory Review Commission on February 17. The regulation replaces the regulations adopted under the original Surplus Lines Insurance Law with updated regulations consistent with Article XVI of the Insurance Company Law as revised in 1992.

While there can and we hope will be some additional surplus lines procedures adopted, more particularly with respect to admitted risks subject to the commercial risk exemption, the regulation under review is both clear and workable and meets the legal standards of the act. We urge that it be approved.

Sincerely,


John R. Doubman

February 14, 2000

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c: Honorable Edwin G. Holl, Chairman
Senate Banking and Insurance Committee

Honorable Nicholas A. Micozzie, Chairman
House Insurance Committee

Honorable M. Diane Koken
Insurance Commissioner

Fiona E. Wilmarth, Regulatory Analyst
Independent Regulatory Review Commission

FAX

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Date 2/14/00

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REMARKS: