The Insurance Federation of Pennsylvania, Inc.

1600 Market Street Suite 1520 Philadelphia, PA 19103 Tel: (215) 665-0500 Fax: (215) 665-0540

October 30, 1998

ORIGINAL: 1988

BUSH

COPIES: Wilmarth

Sandusky

Legal

Robert E. Chappell
Chairman
Sarah H. Lawhorne
Vice Chairman
Henry G. Hager
President &
Chief Executive Officer
Samuel R. Marshall

Samuel R. Marsha President Elect John R. Doubman Secretary & Counsel Marybeth H. Dob Treasurer

Birchard T. Clothier Investment Officer & Assistant Treasurer Jeffrey D. Sharp

Director of Government Affairs

Peter J. Salvatore Regulatory Coordinator Pennsylvania Insurance Department

1326 Strawberry Square Harrisburg, PA 17120

Re: 31 Pa. Code Chapters 35, 123 and 124

Dear Mr. Salvatore:

The Insurance Federation supports the Department's proposed deletion of Chapters 35 and 123 and addition of Chapter 124 governing the activities of surplus lines agents, producing brokers and surplus lines insurers, as published in the October 3 Pennsylvania Bulletin. We agree that this updates the Department's regulations in light of the revisions made in the law by Act 178 of 1992.

By way of this letter, the Insurance Federation asks the Independent Regulatory Review Commission to support the Department's proposed deletion.

Sincerely,

server crashell

Samuel R. Marshall

c: Robert E. Nyce, Executive Director Independent Regulatory Review Commission



COMMONWEALTH OF PENNSYLVANIA INSURANCE DEPARTMENT

OFFICE OF SPECIAL PROJECTS 1326 Strawberry Square Harrisburg, PA 17120

Phone: (717) 787-4429 Fax: (717) 705-3873 E-Mail: psalvato@ins.state.pa.us

November 3, 1998

Mr. Robert Nyce Executive Director Independent Regulatory Review Comm.

333 Market Street Harrisburg, PA 17120 ORIGINAL: 1988

BUSH

COPIES: Wilmarth

Sandusky Legal

Re:

Insurance Department Proposed

Regulation No. 11-170, Surplus Lines

Dear Mr. Nyce:

Pursuant to Section 5(c) of the Regulatory Review Act, the Department is required to submit all comments on proposed regulations received during the public comment period to the Independent Regulatory Review Commission and the Legislative Standing Committees within 5 days.

Attached is a comment received from Mr. Sam Marshall, President Elect of The Insurance Federation of Pennsylvania, Inc. located at 1600 Market Street, Suite 1520, Philadelphia, PA 19103.

If you have any questions regarding this matter, please contact me at (717) 787-4429.

Sincerely yours,

Peter J. Salvatore

Regulatory Coordinator

11170c3