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2001 FEB 22

**Repeal Analysis Form**

(1) Agency

Insurance Department



(2) I.D. Number (Governor's Office Use)

11-201

(3) Short Title

Allocation of Joint Expenses

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2001 FEB 22  
REVIEW COMMITTEE

(4) PA Code Cite

31 Pa. Code, Chapter 3, §§ 3.1-3.6

(5) Agency Contact and Telephone Number:

Peter J. Salvatore, Regulatory Coordinator, 1326 Strawberry Square, Harrisburg, PA 17120, (717) 787-4429

(6) Type (check one)

- Proposed Rulemaking
- Final Order Adopting Regulation
- Final Order, Proposed Rulemaking Omitted

(7) Is a 120-Day Emergency Certification Attached?

- Yes: By the Governor
- Yes: By the Attorney General
- No

(8) Briefly explain in clear and non-technical language the regulation:

The regulations were initially adopted October 21, 1949, and last amended July 7, 1970, under the authority of the act of May 9, 1949, P.L. 1025, No. 298 (act) (40 P.S. §§ 1261-1264). The regulations apply to property and casualty insurers, the State Workmen's Insurance Fund and title insurers. Sections 1 and 2 of the act require these insurers to maintain uniform classifications of accounts and records as may be prescribed by the Insurance Commissioner and in such form as may be determined by the Insurance Commissioner. The regulations were adopted to prescribe uniform accounting rules for the allocation of joint expenses.

(9) Briefly explain why this regulation is proposed for repeal:

Under the authority of the act and Section 320 of the Insurance Company Law (40 P.S. § 443), the Insurance Commissioner has determined that the instructions and accounting practices and procedures manual prescribed by the NAIC to be effective January 1, 2001, sufficiently address the allocation of joint expenses. Specifically, Statement of Statutory Accounting Principles No. 70 in the NAIC manual establishes statutory accounting principles for the apportionment of shared expenses. The regulations in no manner enhance the NAIC instructions and manual. In addition, §§ 3.4(a) and 3.6 of the regulations refer to requirements in Chapter 9 that have been deleted effective August 8, 1998. Therefore, the regulations are outdated and redundant and are no longer needed.

(10) Please list the proposed schedule for repeal noting any public comment periods:

The repeal of the regulations will take effect after a 30-day public comment period; final review and approval by the legislative standing committees, the Independent Regulatory Review Commission and the Office of Attorney General; and upon final publication in the *Pennsylvania Bulletin*.

(11) State any costs and/or savings associated with the repeal:

There are no cost or savings associated with the repeal of this regulation. Insurers will need to comply with accounting procedures that are effective January 1, 2001. This is a continuation of normal business.

# Regulatory Analysis Form

This space for use by IRRC

(1) Agency

Insurance Department

(2) I.D. Number (Governor's Office Use)

IRRC Number:

(3) Short Title

Allocation of Joint Expenses

(4) PA Code Cite

31 Pa. Code, Chapter 3

(5) Agency Contacts & Telephone Numbers

Primary Contact: Peter J. Salvatore, Regulatory Coordinator,  
1326 Strawberry Square, Harrisburg, PA 17120, (717) 787-4429  
Secondary Contact: Elaine Leitzel, (717) 787-8840

(6) Type of Rulemaking (check one)

- Proposed Rulemaking  
 Final Order Adopting Regulation  
 Final Order, Proposed Rulemaking Omitted

(7) Is a 120-Day Emergency Certification Attached?

- No  
 Yes: By the Attorney General  
 Yes: By the Governor

(8) Briefly explain the regulation in clear and nontechnical language.

The regulations were initially adopted October 21, 1949, and last amended July 7, 1970, under the authority of the act of May 9, 1949, P.L. 1025, No. 298 (act) (40 P.S. §§ 1261-1264). The regulations apply to property and casualty insurers, the State Workmen's Insurance Fund and title insurers. Sections 1 and 2 of the act require these insurers to maintain uniform classifications of accounts and records as may be prescribed by the Insurance Commissioner and in such form as may be determined by the Insurance Commissioner. The regulations were adopted to prescribe uniform accounting rules for the allocation of joint expenses.

(9) State the statutory authority for the regulation and any relevant state or federal court decisions.

The regulations are being repealed under the authority of sections 206, 506, 1501 and 1502 of The Administrative Code of 1929 (71 P.S. §§ 66, 186, 411 and 412); the act of May 9, 1949 (P.L. 1025, No. 298)(40 P.S. §§ 1261—1264) and section 320 of The Insurance Company Law (40 P.S. § 443)

### **Regulatory Analysis Form**

(10) Is the regulation mandated by any federal or state law or court order, or federal regulation? If yes, cite the specific law, case or regulation, and any deadlines for action.

No.

(11) Explain the compelling public interest that justifies the regulation. What is the problem it addresses?

There is currently no compelling public interest that justifies the regulations and the Insurance Department proposes to repeal the regulations for the following reasons. Section 320(a) of The Insurance Company Law of 1921 (40 P.S. § 443(a)) requires "every stock and mutual insurance company, association and exchange, doing business in this Commonwealth" to file annual financial statements with the Insurance Commissioner. As amended by the act of December 18, 1992, P.L. 792, No. 176, Section 320 (a) further requires insurers to adhere to the instructions and accounting practices and procedures manuals prescribed by the National Association of Insurance Commissioners (NAIC), unless otherwise provided by law, regulation or order of the Insurance Commissioner. Under the authority of the act and Section 320 of the Insurance Company Law (40 P.S. § 443), the Insurance Commissioner has determined that the instructions and accounting practices and procedures manual prescribed by the NAIC to be effective January 1, 2001, sufficiently address the allocation of joint expenses. Specifically, Statement of Statutory Accounting Principles No. 70 in the NAIC manual establishes statutory accounting principles for the apportionment of shared expenses. The regulations in no manner enhance the NAIC instructions and manual. In addition, §§ 3.4(a) and 3.6 of the regulations refer to requirements in Chapter 9 that have been deleted effective August 8, 1998. Therefore, the regulations are outdated and redundant and are no longer needed.

(12) State the public health, safety, environmental or general welfare risks associated with nonregulation.

There are no public health, safety, environmental or general welfare risks associated with the repeal of the regulations.

(13) Describe who will benefit from the regulation. (Quantify the benefits as completely as possible and approximate the number of people who will benefit.)

Affected insurers will benefit from the repeal of the regulations to the extent that unnecessary, outdated material will be eliminated from the Department's regulations, thereby reducing time spent by insurers in researching redundant, confusing material.

### **Regulatory Analysis Form**

(14) Describe who will be adversely affected by the regulation. (Quantify the adverse effects as completely as possible and approximate the number of people who will be adversely affected.)

No persons, groups or entities will be adversely affected by the repeal of the regulations.

(15) List the persons, groups or entities that will be required to comply with the regulation. (Approximate the number of people who will be required to comply.)

N/A

(16) Describe the communications with and input from the public in the development and drafting of the regulation. List the persons and/or groups who were involved, if applicable.

The Department requested comments from The Insurance Federation of Pennsylvania, Inc., the Pennsylvania Association of Mutual Insurance Companies and counsel for the Pennsylvania Fraternal Congress. In addition, the regulatory process provided for a 30-day public comment period subsequent to publication of the proposed rulemaking in the *Pennsylvania Bulletin*.

(17) Provide a specific estimate of the costs and/or savings to the regulated community associated with compliance, including any legal, accounting or consulting procedures which may be required.

The repeal of the regulations will impose no additional costs on affected insurers.

**Regulatory Analysis Form**

(18) Provide a specific estimate of the costs and/or savings to local governments associated with compliance, including any legal, accounting or consulting procedures which may be required.

There is no fiscal impact on local governments associated with the repeal of the regulations.

(19) Provide a specific estimate of the costs and/or savings to state government associated with the implementation of the regulation, including any legal, accounting, or consulting procedures which may be required.

There is no fiscal impact to state government associated with the repeal of the regulations.

## Regulatory Analysis Form

(20) In the table below, provide an estimate of the fiscal savings and costs associated with implementation and compliance for the regulated community, local government, and state government for the current year and five subsequent years. N/A

	Current FY Year	FY +1 Year	FY +2 Year	FY +3 Year	FY +4 Year	FY +5 Year
<b>SAVINGS:</b>	\$	\$	\$	\$	\$	\$
Regulated Community						
Local Government						
State Government						
<b>Total Savings</b>						
<b>COSTS:</b>						
Regulated Community						
Local Government						
State Government						
<b>Total Costs</b>						
<b>REVENUE LOSSES:</b>						
Regulated Community						
Local Government						
State Government						
<b>Total Revenue Losses</b>						

(20a) Explain how the cost estimates listed above were derived.

N/A

### Regulatory Analysis Form

(20b) Provide the past three year expenditure history for programs affected by the regulation.

N/A

Program	FY -3	FY -2	FY -1	Current FY

(21) Using the cost-benefit information provided above, explain how the benefits of the regulation outweigh the adverse effects and costs.

N/A

(22) Describe the nonregulatory alternatives considered and the costs associated with those alternatives. Provide the reasons for their dismissal.

N/A

(23) Describe alternative regulatory schemes considered and the costs associated with those schemes. Provide the reasons for their dismissal.

N/A

### **Regulatory Analysis Form**

(24) Are there any provisions that are more stringent than federal standards? If yes, identify the specific provisions and the compelling Pennsylvania interest that demands stronger regulation.

No federal standards are applicable to the repeal of the regulations.

(25) How does this regulation compare with those of other states? Will the regulation put Pennsylvania at a competitive disadvantage with other states?

The repeal of the regulations will make Pennsylvania requirements consistent with national codified accounting principles for insurance companies adopted by the National Association of Insurance Commissioners (NAIC).

(26) Will the regulation affect existing or proposed regulations of the promulgating agency or other state agencies? If yes, explain and provide specific citations.

The repeal of the regulations will not affect other existing or proposed regulations.

(27) Will any public hearings or informational meetings be scheduled? Please provide the dates, times, and locations, if available.

No public hearings or informational meetings have been scheduled on the repeal of the regulations.



## Regulatory Analysis Form

(28) Will the regulation change existing reporting, record keeping, or other paperwork requirements? Describe the changes and attach copies of forms or reports which will be required as a result of implementation, if available.

The repeal of the regulations will eliminate unnecessary, outdated information from the Department's regulations.

(29) Please list any special provisions which have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, elderly, small businesses, and farmers.

N/A

(30) What is the anticipated effective date of the regulation; the date by which compliance with the regulation will be required; and the date by which any required permits, licenses or other approvals must be obtained?

The repeal of the regulations will take effect after approval by the legislative standing committees, the Independent Regulatory Review Commission and the Office of the Attorney General; and upon final publication in the *Pennsylvania Bulletin*.

(31) Provide the schedule for continual review of the regulation.

N/A

CDL-1  <b>FACE SHEET FOR FILING DOCUMENTS WITH THE LEGISLATIVE REFERENCE BUREAU</b>  (Pursuant to Commonwealth Documents Law)		RECEIVED 2001 FEB 22 11:11:29 LEGISLATIVE LIBRARY REVIEW COMMISSION
#2148		DO NOT WRITE IN THIS SPACE
Copy below is hereby approved as to form and legality. Attorney General  By _____ (Deputy Attorney General)  _____ Date of Approval  Q Check if applicable. Copy not approved. Objections attached.	Copy below is hereby certified to be a true and correct copy of a document issued, prescribed or promulgated by:  Insurance Department _____ (AGENCY)  DOCUMENT/FISCAL NOTE NO. <u>11-201</u>  DATE OF ADOPTION: _____  BY: <u>M. Diane Koken</u> M. Diane Koken TITLE: <u>Insurance Commissioner</u>	Copy below is hereby approved as to form and legality. Executive or Independent Agencies  BY: <u>John V. Turner</u>  <u>2/12/01</u> DATE OF APPROVAL  (DEPUTY GENERAL COUNSEL) ( <del>CHIEF COUNSEL, INDEPENDENT AGENCY</del> ) (STRIKE INAPPLICABLE TITLE)  Q Check if applicable. No Attorney General approval or objection within 30 days after submission.

**NOTICE OF FINAL RULEMAKING**

**INSURANCE DEPARTMENT**

**31 Pa. Code, Chapter 3, §§3.1-3.6**

**ALLOCATION OF JOINT EXPENSES**

## **PREAMBLE**

The Insurance Department (Department) by this order deletes Chapter 3 (relating to allocation of joint expenses), as set forth in Annex A. The regulations apply to property and casualty insurers, the State Workmen's Insurance Fund and title insurers. The regulations prescribe accounting rules for allocation of joint expenses in financial statements.

### ***Purpose***

The purpose of this rulemaking is to delete Chapter 3 to eliminate obsolete, unnecessary regulations. The regulations were initially adopted October 21, 1949, and last amended July 7, 1970, under the authority of the act of May 9, 1949 (P.L. 1025, No. 289) (40 P.S. §§1261-1264) (act). Specifically, sections 1 and 2 of the act (40 P.S. §§ 1261 and 1262) require property and casualty insurers, the State Workmen's Insurance Fund and title insurers to maintain uniform classifications of accounts and records as may be prescribed by the Insurance Commissioner (Commissioner) and, in addition, to file reports in a form determined by the Commissioner. The regulations were adopted to prescribe uniform accounting rules for the allocation of joint expenses in financial reports filed with the Commissioner. Joint expenses are expenses shared among members of a group of entities.

Section 320(a) of The Insurance Company Law of 1921 requires insurers to file annual financial statements and, as amended by the act of December 18, 1992 (P.L. 792, No. 176), states in pertinent part:

(a)(1) Every stock and mutual insurance company, association, and exchange, doing business in this Commonwealth, shall annually, on or before the first day of March, file in the office of the Insurance Commissioner and with the National Association of Insurance Commissioners a statement which shall exhibit its financial condition on the thirty-first day of December of the previous year[...]The Insurance Commissioner shall require each insurance company, association and exchange to report its financial condition on the statement convention blanks, in such form as adopted by the National Association of Insurance Commissioners[...]and may make such changes, from time to time, in the form of the same as shall seem best adapted to elicit from them a true exhibit of their financial condition.

(2) Unless otherwise provided by law, regulation or order of the Insurance Commissioner, each insurance company, association and exchange shall adhere to the annual or quarterly statement instructions and the accounting practices and procedures manuals prescribed by the National Association of Insurance Commissioners[...]

40 P.S. §443.

Under the authority of the act and section 320 of The Insurance Company Law of 1921, the Insurance Commissioner has determined that the annual statement instructions and the accounting practices and procedures manual (manual) prescribed by the National Association of Insurance Commissioners (NAIC) sufficiently address the allocation of joint expenses. Specifically, Statement of Statutory Accounting Principles No. 70 in the manual establishes statutory accounting principles for the apportionment of shared expenses and refers to the applicable annual statement instructions. The regulations codified in Chapter 3 in no manner enhance the NAIC instructions and manual. In addition, §§ 3.4(a) and 3.6 (relating to records required; and other applicable instructions) refer to requirements in Chapter 9 that have been deleted effective August 8, 1998. Therefore, the regulations are outdated and are no longer needed.

### ***Statutory Authority***

This final-form rulemaking is adopted under the authority of sections 206, 506, 1501 and 1502 of The Administrative Code of 1929 (71 P.S. §§ 66, 186, 411 and 412); the act of May 9, 1949 (P.L. 1025, No. 298) (act) (40 P.S. §§ 1261—1264); and section 320 of The Insurance Company Law (40 P.S. § 443).

### ***Comments***

Notice of the proposed rulemaking was published at 30 Pa.B. 5019 (September 30, 2000) with a 30-day public comment period.

No comments were received from the standing committees. The Insurance Federation of Pennsylvania, Inc., commented in support of the proposed rulemaking to delete the regulations. On November 30, 2000, the Independent Regulatory Review Commission (IRRC) notified the Department that IRRC had no objections, comments or suggestions to offer on the proposed rulemaking.

### ***Fiscal Impact***

The deletion of the regulations has no fiscal impact on state government, the general public, political subdivisions or the private sector.

### ***Paperwork***

The deletion of the regulations will impose no additional paperwork requirements on the Department or insurers.

### ***Persons Regulated***

The deletion of the regulations affects property and casualty insurers, the State Workmen's Insurance Fund and title insurers.

### **Contact Person**

Questions or comments regarding this final-form rulemaking may be addressed in writing to Peter J. Salvatore, Regulatory Coordinator, Pennsylvania Insurance Department, Office of Special Projects, 1326 Strawberry Square, Harrisburg, Pennsylvania 17120, telephone number: (717) 787-4429. Questions and comments may also be e-mailed to [psalvatore@state.pa.us](mailto:psalvatore@state.pa.us) or faxed to (717) 705-3873.

### **Regulatory Review**

Under section 5(a) of the Regulatory Review Act (71 P.S. §745.5(a)), the agency submitted a copy of this regulation on September 21, 2000, to the Independent Regulatory Review Commission (IRRC) and to the Chairpersons of the Senate Committee on Banking and Insurance and the House Committee on Insurance. In addition to the submitted regulation, the agency has provided IRRC and the Committees with a copy of a detailed Regulatory Analysis Form prepared by the agency in compliance with Executive Order 1996-1, "Regulatory Review and Promulgation." In compliance with section 5(c) of the Regulatory Review Act (71 P.S. § 745.5(c)), the agency also provided IRRC and the Committees with copies of the comments received. A copy of that material is available to the public upon request.

This final-form regulation was deemed approved by the Senate Committee on Banking and Insurance on \_\_\_\_\_ and deemed approved by the House Committee on Insurance on \_\_\_\_\_ in accordance with section 5a(d) of the Regulatory Review Act (71 P.S. § 745.5a(d)). The IRRC met on \_\_\_\_\_ and deemed approved the regulation in accordance with section 5a(e) of the Regulatory Review Act (71 P.S. §745.5a(e)).

### **Findings**

The Insurance Commissioner finds that:

(1) Public notice of intention to adopt this rulemaking as amended by this order has been given under sections 201 and 202 of the act of July 31, 1968 (P.L. 769, No. 240) (45 P.S. §§ 1201 and 1202), and the regulations thereunder, 1 Pa. Code §§ 7.1 and 7.2.

(2) The adoption of this rulemaking in the manner provided in this order is necessary and appropriate for the administration and enforcement of the authorizing statutes.

### **Order**

The Insurance Commissioner, acting under the authorizing statutes, orders that:

(1) The regulations of the Department, 31 Pa. Code, Chapter 3, are amended to read as set forth in Annex A.

(2) The Commissioner shall submit this order and Annex A to the Office of General Counsel and Office of Attorney General for approval as to form and legality as required by law

(3) The Commissioner shall certify this order and Annex A and deposit them with the Legislative Reference Bureau as required by law.

(4) This order shall take effect upon publication in the *Pennsylvania Bulletin*.

M. DIANE KOKEN  
Insurance Commissioner

CONTINUATION SHEET FOR FILING DOCUMENTS  
WITH THE LEGISLATIVE REFERENCE BUREAU  
Pursuant to Commonwealth Documents Law

**Annex A**

**TITLE 31. INSURANCE**

**PART I. GENERAL PROVISIONS**

**SUBPART A. UNIFORM CLASSIFICATION OF EXPENSES**

**CHAPTER 3. ALLOCATION OF JOINT EXPENSES**

Sec.

- 3.1. [Definitions.] Reserved.
- 3.2. [Basis of allocation.] Reserved.
- 3.3. [Other bases permitted or prescribed.] Reserved.
- 3.4. [Records required.] Reserved.
- 3.5. [Interim allocations of joint expenses.] Reserved.
- 3.6. [Other applicable instructions.] Reserved.

**§ 3.1. [Definitions.] (Reserved).**

[The following words and terms, when used in this chapter, shall have the following meanings, unless the context clearly indicates otherwise:

*Overhead on salaries* -- When used as a basis of allocation, the term indicates that the allocation of expenses shall follow the percentages of the applicable salaries allocation.

*Premiums* -- When used as a basis of allocation, the term indicates that the allocation of expenses shall follow the percentages of applicable premiums.

*Special studies* -- When used as a basis of allocation, the term indicates that expenses shall be analyzed and bases of allocation applied as dictated by that analysis.]

**§ 3.2. [Basis of allocation.] (Reserved).**

[Joint expenses, as described in § 1.1 (Reserved), shall be allocated to companies as follows:

<i>Expenses To Be Allocated To Companies</i>	<i>Bases Of Allocation To Companies</i>
Advertising	Premiums
Boards, bureaus, and associations	Special studies
Surveys and underwriting reports	Special studies
Audit of assureds' records	Special studies
Salaries	See §§ 9.1 and 9.2 (Reserved)

Employe relations and welfare

Overhead on salaries

*Expenses To Be Allocated To  
Companies*

*Bases Of Allocation To Companies*

Pensions

Overhead on salaries

Traveling and entertaining

Special studies

Rent and rent items

Overhead on salaries

Equipment

Overhead on salaries

Printing and stationery

Overhead on salaries

Postage, telephone and telegraph,

exchange and express

Overhead on salaries

Legal and auditing

Special studies

Payroll taxes

Overhead on salaries

Miscellaneous

Special studies]

**§ 3.3. [Other bases permitted or prescribed.] (Reserved).**

[For those operating expense classifications permitting the basis overhead on salaries or premiums, any other basis of allocation may be adopted which yields more accurate results. The bases overhead on salaries and premiums shall not be used if clearly inappropriate.]

**§ 3.4. [Records required.] (Reserved.)**

(a) The methods followed in allocating joint expenses shall be described, kept, and supported as prescribed in § 9.48 (relating to detail of allocation bases form).

(b) The effects of the application to each operating expenses classification of all bases of allocation shall be shown on records kept in clear and legible form. The records shall be readily available for examination.]

**§ 3.5. [Interim allocations of joint expenses.] (Reserved).**

[It shall be permissible to apportion expenses between companies during the year on the basis of methods and procedures other than those prescribed in this chapter if allocations of corrected amounts, calculated in accordance with this subpart, are made in time for entry in the annual statement.]

**§ 3.6. [Other applicable instructions.] (Reserved.)**

[In making any allocations of joint expenses, companies shall observe the provisions of §§ 9.11 -- 9.20 (Reserved).]





**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](mailto:psalvato@ins.state.pa.us)

February 22, 2001

Mr. Robert Nyce  
Executive Director  
Independent Regulatory Review Comm.  
333 Market Street  
Harrisburg, PA 17101

Re: Insurance Department Final  
Form Regulation No. 11-201,  
Allocation of Joint Expenses


Dear Mr. Nyce:

Pursuant to Section 5a(c) of the Regulatory Review Act, enclosed for your review and approval is final form regulation 31 Pa. Code, Chapter 3, Allocation of Joint Expenses

The purpose of this rulemaking is to delete Chapter 3 to eliminate obsolete, unnecessary regulations. The regulation was initially adopted October 21, 1949, and last amended July 7, 1970, under the authority of the act of May 9, 1949 (P.L. 1025, No. 289) (40 P.S. §§1261-1264) (act). Specifically, sections 1 and 2 of the act (40 P.S. §§ 1261 and 1262) require property and casualty insurers, the State Workmen's Insurance Fund and title insurers to maintain uniform classifications of accounts and records as may be prescribed by the Insurance Commissioner (Commissioner) and, in addition, to file reports in a form determined by the Commissioner. The regulation was adopted to prescribe uniform accounting rules for the allocation of joint expenses in financial reports filed with the Commissioner. Joint expenses are expenses shared among members of a group of entities.

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

Sincerely yours,

  
Peter J. Salvatore  
Regulatory Coordinator

**TRANSMITTAL SHEET FOR REGULATIONS SUBJECT TO THE  
REGULATORY REVIEW ACT**

I.D. NUMBER: 11-201  
 SUBJECT: Allocation of Joint Expenses  
 AGENCY: DEPARTMENT OF INSURANCE #2148

**TYPE OF REGULATION**

- Proposed Regulation
- X Final Regulation
- Final Regulation with Notice of Proposed Rulemaking Omitted
- 120-day Emergency Certification of the Attorney General
- 120-day Emergency Certification of the Governor
- Delivery of Tolled Regulation
  - a. With Revisions
  - b. Without Revisions

RECEIVED  
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 INDEPENDENT  
 REGULATORY  
 REVIEW COMMISSION

**FILING OF REGULATION**

DATE	SIGNATURE	DESIGNATION
2/22/01	<i>Sheila Euhart</i>	HOUSE COMMITTEE ON INSURANCE
2/22/01	<i>Deirdre Mitchell</i>	SENATE COMMITTEE ON BANKING & INSURANCE
2/22/01	<i>Tim Eohart</i>	INDEPENDENT REGULATORY REVIEW COMMISSION
_____	_____	ATTORNEY GENERAL
_____	_____	LEGISLATIVE REFERENCE BUREAU