

**The Insurance Federation of Pennsylvania, Inc.**

RECEIVED

2000 NOV -3 AM 8:51

1600 Market Street

Suite 1520

Philadelphia, PA 19103

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Tel: (215) 665-0500 Fax: (215) 665-0540

E-mail: mailbox@ifpenn.org

**John R. Doubman**

Secretary & Counsel

October 30, 2000

Original: 2148

Peter J. Salvatore,  
Regulatory Coordinator  
Pennsylvania Insurance Department  
1326 Strawberry Square  
Harrisburg, PA 17120

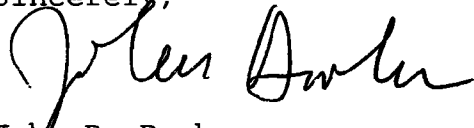
**Re: Allocation of Joint Expenses: 31 Pa. Code Chapter 3;  
11-201**

Dear Mr. Salvatore:

The Insurance Federation supports the proposed regulation deleting Chapter 3 relating to the accounting rules for allocating joint expenses in financial statements. The Federation circulated the regulation as published in the September 30 Pennsylvania Bulletin and received no negative comments from member companies.

Thank you for the opportunity to comment on the regulation. Feel free to call with any questions or comments.

Sincerely,



John R. Doubman

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

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

Honorable Nicholas A. Micozzie, Chairman  
House Insurance Committee