

The Insurance Federation of Pennsylvania, Inc.

Original: 2149

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John R. Doubman
Secretary & Counsel

October 30, 2000

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

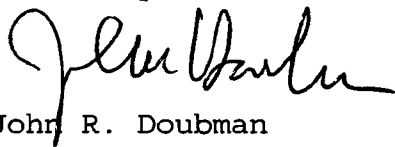
**Re: Miscellaneous Provisions: 31 Pa. Code Chapter 11;
11-202**

Dear Mr. Salvatore:

The Insurance Federation supports this proposed regulation updating Chapter 11 by making miscellaneous changes and clarifications to it as to Department charges for certifying records, prescribing accounting rules for reporting EDP equipment, allocating commission on sliding scale and guaranteed profit reinsurance contracts and classifying salvage and subrogation recovery expenses. 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