

Original: 2154

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

**1600 Market Street  
Suite 1520  
Philadelphia, PA 19103  
TEL: (215) 665-0500 FAX: (215) 665-0540  
E-mail: mailbox@ifpenn.org**

**John R. Doubman**  
Secretary & Counsel

May 16, 2001

Robert E. Nyce  
Executive Director  
Independent Regulatory Review Commission  
333 Market Street  
Harrisburg, PA 17101

**Re: Regulation 11-197 - Insurance Department's  
Discounting Medical Malpractice Loss Reserves**

RECEIVED  
2001 MAY 22 AM 8:59  
INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Mr. Nyce:

The Insurance Federation supports the captioned final form regulation to be considered by the Independent Regulatory Review Commission on May 17. The regulation amends Chapter 118 on the discounting of medical malpractice loss reserves to prohibit the discounting of loss reserves on policies effectuated after its effective date.

The Federation worked with the Insurance Department on the final form regulation and approves of the modifications made in it to alleviate the concerns of the Federation. This will place the Federation's approval on record.

Sincerely,



John R. Doubman

c: Peter J. Salvatore, Regulatory Coordinator  
Pennsylvania Insurance Department

Fiona E. Wilmarth, Regulatory Analyst  
Independent Regulatory Review Commission