

**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**

September 18, 2002

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

**Re: Regulation 11-204 - Insurance Department's  
Securities Custodial Agreements Regulation**

Dear Mr. Nyce:

The Insurance Federation supports the captioned final form regulation to be considered by the Independent Regulatory Review Commission on September 26. The regulation establishes a new Chapter 148a establishing requirements for custodial agreements for those entities holding securities for domestic insurers.

This will place the Federation's approval on record.

Sincerely,

John R. Doubman

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

Scott Schalles, Regulatory Analyst  
Independent Regulatory Review Commission

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