

Original: 2392



**I N S U R A N C E  
A G E N T S & B R O K E R S  
O F P E N N S Y L V A N I A**

*Success through Independence  
and Professionalism.*

March 26, 2004

Coal and Clay Mine Subsidence Insurance Board  
PO Box 8462  
Harrisburg, PA 17101-2301

**RE: REVISIONS TO 25 PA. CODE CH. 401**

The Coal and Clay Mine Subsidence Insurance Board has proposed amending provisions of the current regulation to make the regulation and policy language consistent, as well as remove certain provisions of the policy terms and language from the regulatory process.

The Insurance Agents & Brokers of Pennsylvania, Inc. fully supports the proposed changes. First, with respect to revisions to make the regulation consistent with the policy language, the change will remove potential policyholder confusion with respect to coverage terms. And since the producer community relies primarily on the policy language in assisting their policyholders, the consistency will remove uncertainties in coverage explanation and the potential consequences resulting from coverage disputes. Second, IA&B supports the deletion of coverage limits and premiums from the regulation to permit the Board to be more responsive to policyholder and market needs.

With the enactment of Act 155 of 2002 and the recognition of the importance of the producer community in Pennsylvania to increased consumer awareness of the Fund and the Fund's mission, we look forward to working more closely with the Fund on areas of common interest.

Sincerely,

Timothy P. Lyden  
Vice President of Public Affairs

TPL/cn

c: IA&B of PA Board of Directors  
IA&B Public Affairs Committee  
Laura J. Kuller, Esq., Klett Rooney Lieber & Shoring  
Joseph Leighton, Esq., DEP Director of Legislative Affairs  
Scott R. Schalles, Analyst, IRRC

Affiliated with



P.O. Box 2023  
5050 Ritter Road  
Mechanicsburg, PA 17055  
717.795.9100  
F. 717.795.8347  
www.iabgroup.com