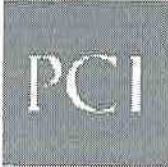


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**Property Casualty Insurers  
Association of America**

Shaping the Future of American Insurance

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

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2006 AUG -2 PM 2:42  
INDEPENDENT REGULATORY  
REVIEW COMMISSION

**Re: Proposed Chapter 118a - property and casualty  
actuarial opinion regulation**

Dear Mr. Salvatore:

On behalf of our member companies the Property Casualty Insurance Association submits the following with respect to the Insurance Department's proposed regulation implementing the NAIC's instructions for actuarial opinions as published in the July 1 Pennsylvania Bulletin.

Our member companies have raised two concerns about the proposed regulations.

First, it is unclear whether the Department will request the Actuarial Opinion Summary (AOS) from foreign insurers. The Annual Statement Instructions states that the AOS should only be filed with the domiciliary state. If another state requests the AOS, they have to demonstrate they have the same confidentiality protection as the domiciliary state. Only a few non domiciliary states currently require the AOS for its foreign insurers. Foreign Pennsylvania companies should not have to file its AOS in Pennsylvania.

Second, with respect to confidentiality, does Section 118a.4(a) provide confidentiality protection for the AOS? The comment in the Bulletin was the Commissioner may share information filed under the chapter. This seems to be a broad authority given to the Department to share the AOS without any restrictions or understanding as to how it is to be shared. PCI members would rather not see that information shared given the current language proposed in the regulation.

Thank you for permitting PCI to submit comments regarding the proposed regulations.

Very Truly Yours,

Angela Zaydon