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**Knehr, George**

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**From:** Cathy James [CJames@PorterCurtis.com]

2009 MAY 27 AM 9: 47

**Sent:** Tuesday, May 19, 2009 1:57 PM**To:** Knehr, George**Cc:** Margaret Toland; Bill Curtis; Christina Kerper, ARM; Ken Porter; Lisa Thompson; Marge Layton**Subject:** Proposed Rulemaking - CommentsINDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear George:

- Amending 125.3(c)(2)(i) to require consolidated financial statements of parent and affiliates would create a virtually insurmountable obstacle for some Pennsylvania employers, notably Catholic Dioceses and Archdioceses. Suggest a "grandfather" exception or minimum financial threshold exception.
- Can you provide an estimate for the "one-time additional costs" associated with reprogramming the computer system and how that would be applied to the self-insurers?
- Please set up the required electronic reporting to accept data in an Excel spreadsheet, since virtually all TPA's can down-load their loss data into an Excel spreadsheet and this will not require additional work for the self-insurers. The format can be established by BWC and the data columns can be cut and pasted into that format - just don't make us have to re-key data, please!
- What is the purpose of the Catastrophic loss estimate? What is it used for? Does it factor into security requirements?
- 125.4 Application for affiliates and subsidiaries - "A written request shall be made by the applicant to delete an affiliate or ad subsidiary from a consolidated permit after its issuance." This change takes out the requirement to request additions to the permit, which is good. Is there any other provision that requires the parent to report additions?

Best regards,

***Cathy L. James***

Cathy L. James, CPCU, ARM, ARe

Vice President

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5/19/2009