

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

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**Samuel R. Marshall**  
President & CEO

September 26, 2012

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

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**Re: Proposed regulations Nos. 11-249 and 11-250**

Dear Mr. Salvatore:

On behalf of our members, we write in support of the Department's proposed regulations revising Chapters 161 and 163 of its regulations, modernizing the standards by which domestic insurers may take credit for reinsurance and reflecting broader changes in NAIC models.

We appreciate the balances and nuances these proposals raised, and the efforts the Department made in getting a proposal that is both progressive and thorough in ensuring responsible treatment of credit for reinsurance. We realize timing is tight, but we hope this can be done in final form before year-end.

Sincerely,

Samuel R. Marshall

C: Honorable Donald C. White and Michael J. Stack  
Senate Banking and Insurance Committee  
Honorable Nicholas A. Micozzie and Anthony M. DeLuca  
House Insurance Committee