



ace group

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E. Blaine Stanley
Vice President & Counsel

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September 28, 2012

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

2012 OCT - 1 AM 8:49

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IRRC

Re: Proposed Regulations Nos. 11-249 and 11-250

Dear Mr. Salvatore:

I write to express the strong support of ACE Group for the Department's proposed revisions to Chapters 161 and 163 of its regulations. The proposed revisions update the standards regarding credit for reinsurance ceded to a duly certified reinsurer, in a manner substantially similar to the NAIC Credit for Reinsurance Model Law and Model Regulation.

The ACE Group is a global leader in insurance and reinsurance serving a diverse group of clients, offering a variety of insurance products for individuals, families and businesses of all sizes. In addition to having numerous companies domiciled in Pennsylvania, ACE maintains its United States headquarters in Philadelphia and employs around 2,000 people in the Commonwealth.

We appreciate the efforts of the Department in setting forth this proposal and strongly support finalization of these revisions as soon as possible. Please contact me directly if you have any questions or wish to discuss this matter directly.

Sincerely,

E. Blaine Stanley

cc: Honorable Donald C. White and Honorable Michael J. Stack
Senate Banking and Insurance Committee

Honorable Nicholas A. Micozzie and Honorable Anthony M. DeLuca
House Insurance Committee