



Commonwealth of  
Massachusetts

Division of  
Insurance

# 2008 Annual Report

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Commissioner of Insurance

[www.mass.gov/doi](http://www.mass.gov/doi)

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# 1 - Division of Insurance

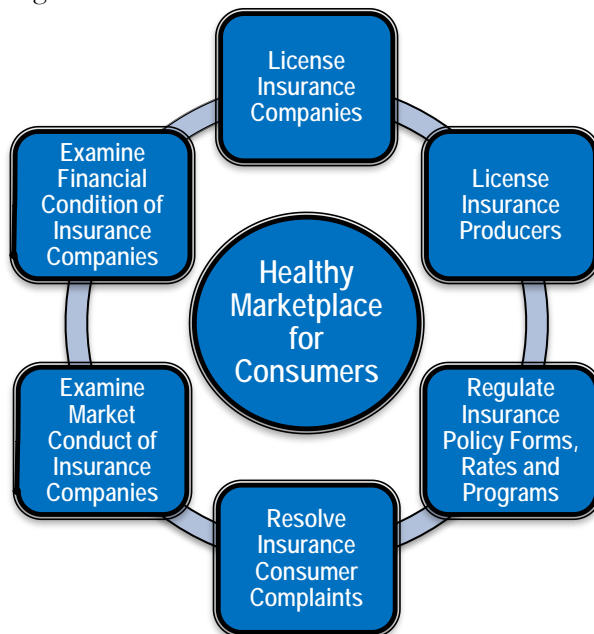
The Division of Insurance administers the laws of the Commonwealth as they pertain to the protection of the insurance consumer through the regulation of the insurance industry. The Division monitors financial solvency; licenses insurance companies and producers; reviews and approves rates and forms; and coordinates the takeover and liquidation of insolvent insurance companies and the rehabilitation of financially troubled companies. The Division also investigate and enforce state laws and regulations pertaining to insurance and respond to consumer inquiries and complaints. The Division provides the public with information regarding various types of insurance through its website and assorted publications.

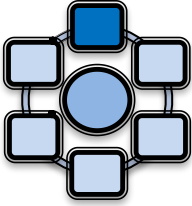
## 1.1 Mission

The primary mission of the Division of Insurance is to monitor the solvency of its licensees in order to promote a healthy, responsive and willing marketplace for consumers who purchase insurance products. Protection of consumer interests is of prime importance. The Division safeguards these interests by providing accurate and unbiased information so consumers may make informed decisions and by intervening on behalf of consumers who believe they have been victimized by unfair business practices.

## 1.2 Primary Activities

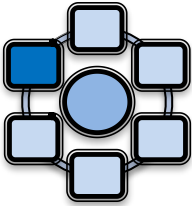
The Division of Insurance protects consumers and promotes a fiscally sound insurance marketplace through the performance of six primary activities. Taken together, these activities represent the core of effective insurance regulation.





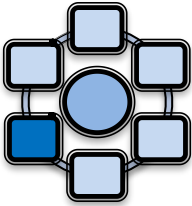
### **License Insurance Companies**

The process of licensing insurance carriers promotes a marketplace of solvent, fiscally sound companies through the review and analysis of filings and financial statements.



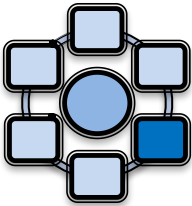
### **Examine the Financial Condition of Insurance Companies**

The Division monitors the financial condition of insurance carriers through quarterly financial analyses. This process provides an early warning of possible financial problems so that appropriate regulatory action can be taken before the extreme situation of an insolvency. The monitoring process also includes periodic on-site financial examinations of all domestic carriers to value assets, determine liabilities and verify compliance with applicable statutes and regulations.



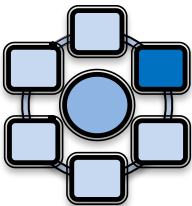
### **Examine the Market Conduct of Insurance Companies**

Beyond the financial health of an insurer, the Division also examines how the company interacts with policyholders and potential customers. The market conduct process looks beyond the financial condition of a company by examining business practices such as policy underwriting and rating practices; cancellations and non-renewals; claim settlements; original insurance applications; and advertising materials. The goal of these examinations is to confirm that Massachusetts consumers are treated with fairness and according to the terms of the insurance contract.



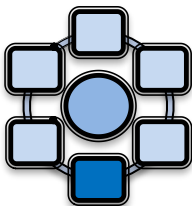
### **Regulate Insurance Policy Forms, Rates and Programs**

By reviewing and approving insurance policy forms, rules, rates, and associated program procedures and operations, the Division verifies that insurance products sold to Massachusetts consumers by licensed insurance companies comply with the laws and regulations of the Commonwealth.



### **License Insurance Producers and Others**

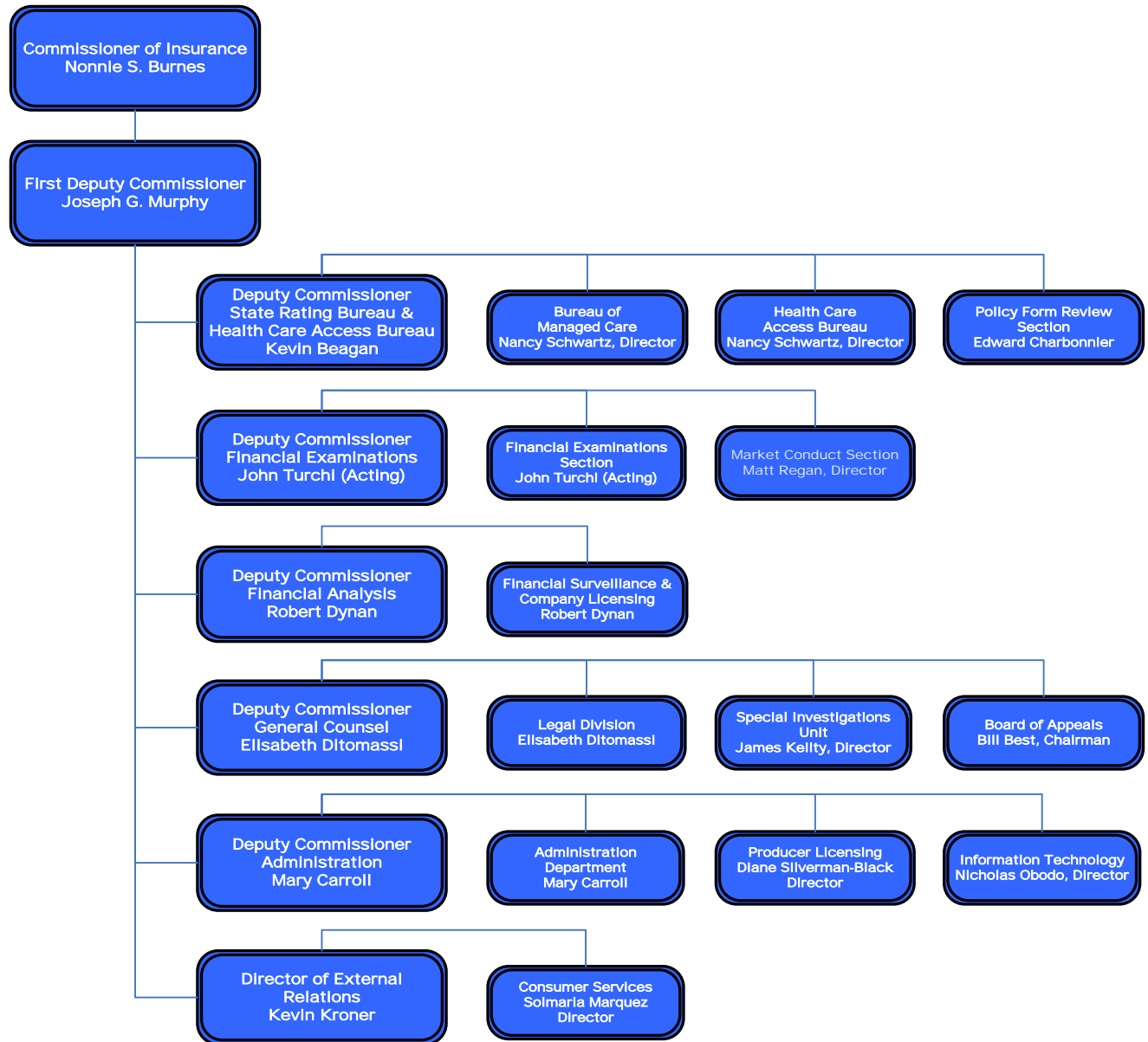
The process of licensing insurance producers and other key participants in the insurance industry allows the Division to promote a marketplace where individuals and firms conducting the business of insurance are qualified and that they conduct business within the requirements of the laws and regulations of the Commonwealth.



### **Resolve Insurance Consumer Complaints**

The Division provides the general public with a non-judicial alternative for pursuing complaints against insurance companies and producers. Every consumer submitting a complaint receives a reply and a resolution that is consistent with Massachusetts law.

### 1.3 Organizational Chart



### 1.4 Human Resources

The Administration Department works closely with the Human Resources department of the Office of Consumer Affairs and Business Regulation on all aspects of managing the Division's workforce, including hiring, promoting, and training. In addition, working with the Division's Labor Relations Counsel, the Administration department responds to various labor relations issues, including employee complaints, grievances and other activities. As of December 31, 2008, the DOI employed 129.27 full time equivalent (FTE) staff.

#### Division of Insurance Staffing Levels

1978 - 233

2008 - 129

DIVISION OF INSURANCE BUDGET	
Main Appropriation	\$10,960,219
Medical Malpractice Fund	\$342,670
Health Care Access Bureau	\$600,000
Workers' Compensation Fund	\$723,616
SRB Medical Malpractice Fund	\$359,250
<b>Total</b>	<b>\$12,985,755</b>

REVENUE	
Appointments	\$34,168,469
Company Licenses	\$295,050
Domestic Company Exams	\$654,710
Fines & Penalties	\$411,200
Rate & Form Filing Fees	\$692,775
Annual Statements	\$213,085
Life Insurance Valuations	\$666,474
Miscellaneous	\$189,658
<b>Total from Companies</b>	<b>\$37,291,421</b>
Special Brokers Tax	\$27,590,625
Producer Licenses	\$8,259,485
Other Licenses & Exam Fees	\$281,075
Board of Appeal Filing Fees	\$2,245,123
DPH Lead Paint Surcharge	\$807,640
Miscellaneous	\$64,857
<b>Total from Individuals</b>	<b>\$39,248,805</b>

ASSESSMENTS	
Attorney General – Rate Setting	\$1,862,332
Attorney General – Auto Fraud	\$432,026
Attorney General – Workers' Compensation Fraud	\$280,146
Department of Fire Services	\$12,207,596
DOI Operations	\$10,960,219
Health Care Access Bureau	\$654,793
Medical Malpractice Analysis Bureau	\$309,996
Merit Rating Bureau	\$9,241,546
Special Life Assessment	\$1,014,000
SRB Operations	\$917,221
SRB Medical Malpractice	\$452,692
SRB Workers Compensation	\$817,141
<b>Total Assessments</b>	<b>\$39,149,726</b>

## 1.5 Budget, Revenue & Assessments

### Budget

The Division receives an annual appropriation to account 7006-0020 from the General Court, the value of which is then assessed back on the entities regulated by the Division. In addition, the Division has three statutorily created trust accounts: State Rating Bureau Workers Compensation Trust Account - 9222-7650; State Rating Bureau Medical Malpractice Trust Account - 9222-7900; and, the DOI Medical Malpractice Trust Account - 9222-7500. These appropriations are funded through direct assessment on the insurance industry.

The Administration Department works closely with the Budget Department of the Administrative Services Unit of the Office of Consumer Affairs and Business Regulation on the Division's budget, the Governor's budget recommendation for House 1, the allocation of funds into lower subsidiaries and the management of the spending throughout the year.

### Revenue & Assessments

The Division of Insurance collects revenue from individuals and companies as part of its statutory responsibilities. In addition, the Division also bills assessments to the industry and collects these funds for the General Fund. Most revenue collected from companies and individuals comes from application and filing fees as well as some fines and penalties.

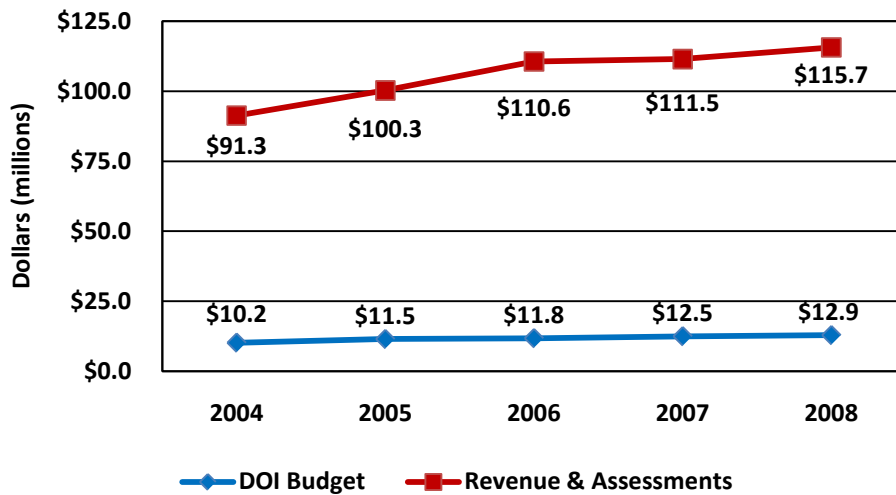
The Commissioner of Insurance is required by the Massachusetts General Laws to bill assessments to insurance companies for various purposes. In Fiscal Year 2008, the Division billed twelve assessments totaling more than \$39 million. The revenue collected from these assessments fund a number of state agencies, including the Division of Insurance, Registry of Motor Vehicle's Merit Rating Board, the Department of Fire Services and various fraud fighting programs in the Attorney General's Office.

Taken together, these revenues and assessments are typically nine to ten times greater than the annual budget appropriation for the Division. In Fiscal Year 2008, the Division of Insurance collected a grand total of more than \$115 million.

TOTAL 2008 DOI REVENUE COLLECTIONS	
Company Revenue	\$37,291,421
Individual Revenue	\$39,248,805
Assessments	\$39,149,726
<b>Total Collections</b>	<b>\$115,689,952</b>

Budget, Revenue and Assessment figures on this page are from the 2008 Fiscal Year - July 1, 2007 through June 30, 2008.

**DOI Budget Appropriation Compared to Collected Revenue  
2004 - 2008**

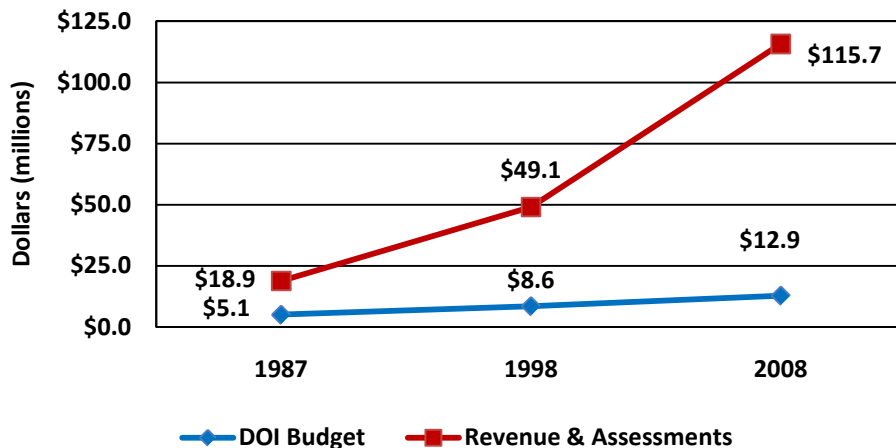


## A Bargain for Taxpayers

### 2007 Staffing & Budget National Rank:

Premium Volume	10 <sup>th</sup>
Full Time Employees	25 <sup>th</sup>
Annual Budget	28 <sup>th</sup>
Budget as Percentage of Revenue	54 <sup>th</sup>
Budget as Percentage of Total Premium	56 <sup>th</sup>

**DOI Budget Appropriation Compared to Collected Revenue  
1987 - 2008**



### Insurance Written in Massachusetts

According to a 2008 survey by the National Association of Insurance Commissioners (NAIC), Massachusetts ranks 10<sup>th</sup> among 56 U.S. states and territories with respect to premium written by domestic insurers.

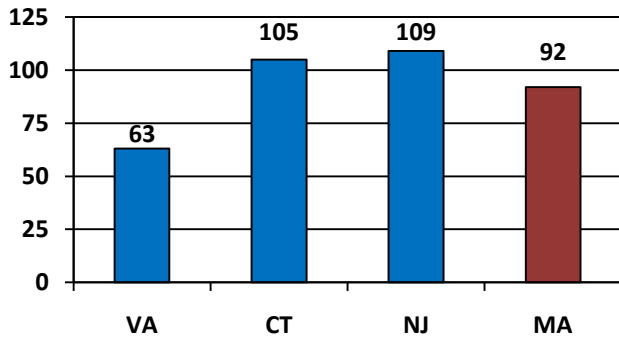
Considering that the Commonwealth's population is much smaller than the other states in the top 10, Massachusetts shoulders a disproportionate share of the responsibility to regulate U.S. insurers. In fact, by most any measure of regulatory performance, the Massachusetts Division of Insurance does more with less. Compared to most other states, the Division represents a relative bargain for taxpayers, policyholders and insurers in the Commonwealth.

### 2007 Total Premium Volume by State & Territory

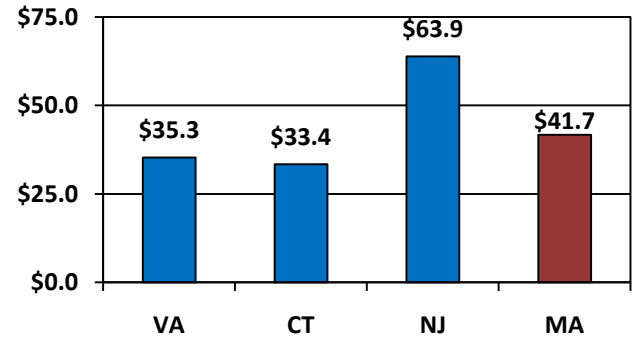
1. California	\$220,214,456,682
2. New York	\$134,150,894,852
3. Texas	\$95,582,667,320
4. Florida	\$93,310,910,656
5. Pennsylvania	\$78,135,583,439
6. New Jersey	\$63,938,342,348
7. Illinois	\$59,102,832,329
8. Ohio	\$54,165,058,331
9. Michigan	\$51,371,145,986
10. Massachusetts	\$41,755,199,292

## The Division of Insurance does more...

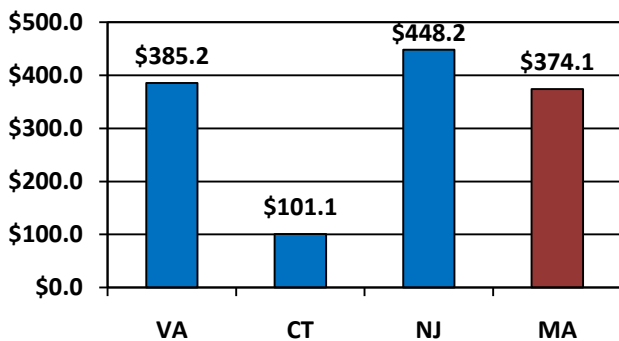
### 2007 Domestic Insurers



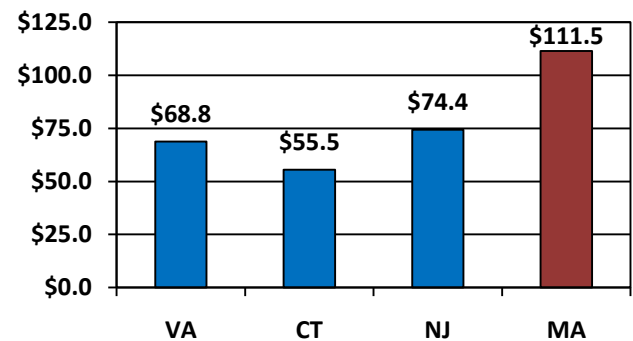
### 2007 Total Premium (billions)



### 2007 Taxes (millions)

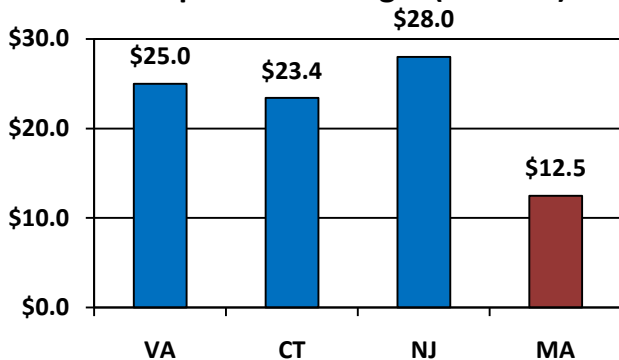


### 2007 Revenues (millions)

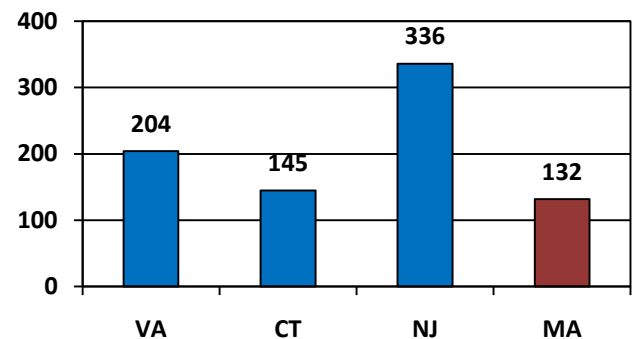


## ...with less

### 2007 Department Budget (millions)



### 2007 Staffing





## 1.6 The Massachusetts Insurance Marketplace

### Massachusetts Domesticity

Hundreds of insurance companies are licensed to do business in the Commonwealth of Massachusetts. Each year, these companies write tens of billions of dollars in premium in Massachusetts. The Division of Insurance licenses each of these companies and regulates all aspects of their business conduct. For those companies chartered in Massachusetts, the Division is responsible for ensuring company solvency. Monitoring the solvency of Massachusetts domesticity not only protects citizens of the Commonwealth, but policyholders across the nation and around the world.

In 2008, Massachusetts was the domicile of:

- 59 property & casualty insurers
- 19 life, accident and health insurers
- 3 title insurance companies
- 10 health maintenance organizations
- 2 lodge fraternal organizations
- 3 medical service corporations
- 24 workers' compensation self-insured groups
- 4 residual market pools
- 162 fraternal benefit and mutual aid societies

### Company Market Share

Among the scores of insurance products marketed and sold in Massachusetts, certain lines of insurance represent the lion's share of premium and policies. Premium written under Accident and Health, Homeowner's, Life, Automobile and Worker's Compensation policies make up approximately 50% of all premium written in the Commonwealth. With the exception of Private Passenger Automobile Insurance, most lines of insurance operate with diverse markets. Consumers can choose from among large numbers of competing companies.

In 2008,  
Massachusetts  
was the Principal  
Regulator for:

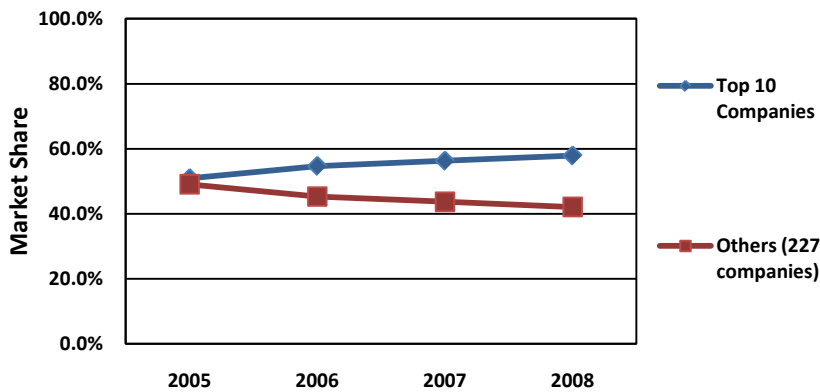
91 Insurance  
Companies

&

195 Related  
Organizations

### Top 10% of Selected Market Sectors

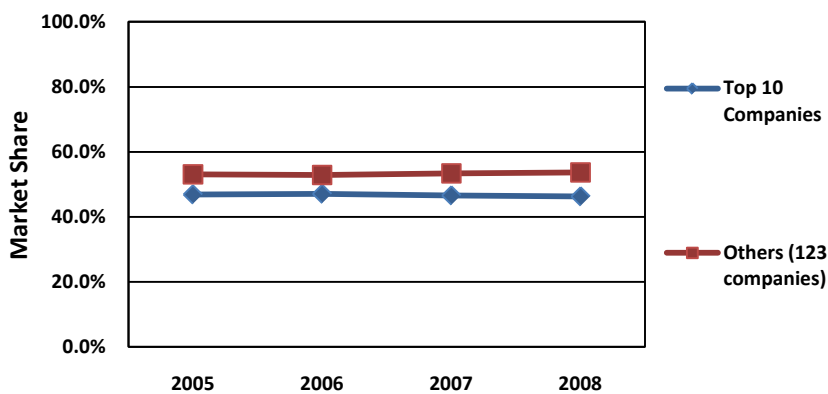
#### Top 10 Accident & Health Companies\*



#### Top 10 Accident & Health Insurance Companies\*

United Healthcare Ins Co	20.3%
Metropolitan Life Ins Co	6.4%
Aetna Life Ins Co	5.8%
Unum Life Ins Co of America	5.6%
Connecticut General Life Ins Co	4.7%
Guardian Life Ins Co of America	4.3%
Unicare Life & Health Ins Co	3.3%
Humana Ins Co	2.7%
Hartford Life & Accident Ins Co	2.7%
Genworth Life Ins Co	2.1%

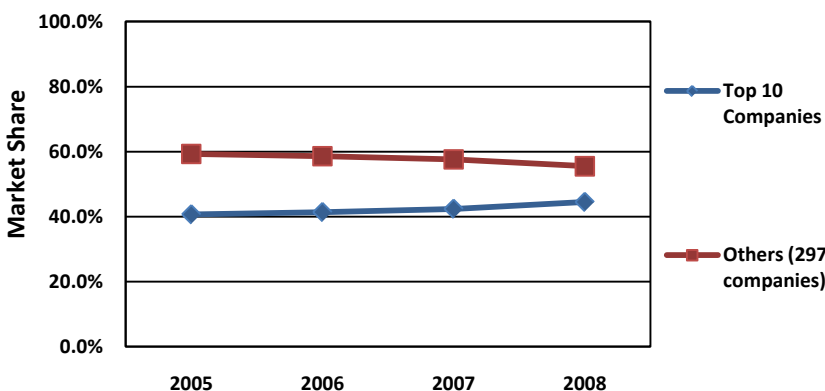
#### Top 10 Home Insurance Companies



#### Top 10 Home Insurance Companies

Merrimack Mutual Fire Ins Co	5.9%
Citation Ins Co	5.9%
Liberty Mutual Fire Ins Co	5.9%
Arbella Mutual Ins Co	5.5%
Quincy Mutual Fire Ins Co	5.0%
Commerce Ins Co	4.5%
Phoenix Ins Co	3.9%
Vermont Mutual Ins Co	3.7%
Amica Mutual Ins Co	3.1%
Metropolitan Property & Casualty Ins Co	2.9%

#### Top 10 Life Companies

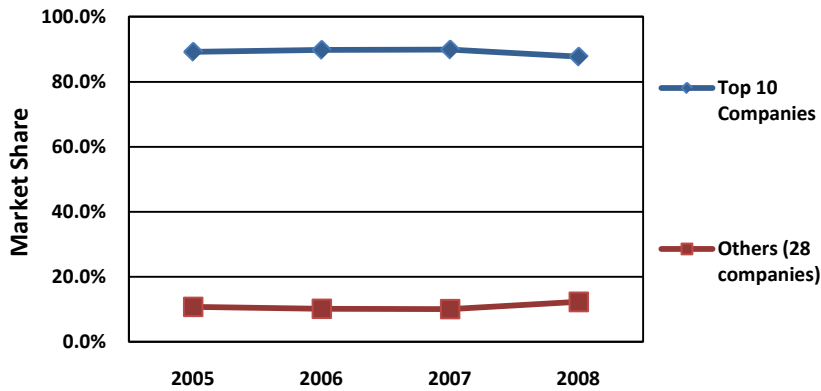


#### Top 10 Life Insurance Companies

Metropolitan Life Ins Co	8.5%
Northwestern Mutual Life Ins Co	7.2%
Savings Bank Life Ins Co of MA	4.7%
Guardian Life Ins Co of America	4.2%
MA Mutual Life Ins Co	3.9%
Lincoln National Life Ins Co	3.8%
New York Life Ins Co	3.6%
Prudential Ins Co of America	3.4%
John Hancock Life Ins Co	3.0%
New York Life Ins & Annuity Co	2.2%

\* Most health insurance is offered through Health Maintenance Organizations (HMOs). For HMO market share data, see appendix C-20

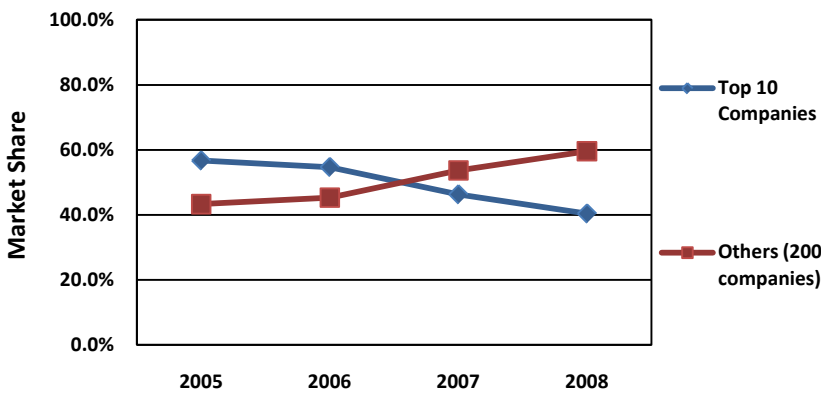
### Top 10 Auto Companies



### Top 10 Auto Insurance Companies

Commerce Ins Co	31.0%
Safety Insurance Co	11.1%
Arbella Mutual Ins Co	9.8%
Liberty Mutual Ins Co	8.4%
Metropolitan Property & Casualty Ins Co	7.5%
Premier Ins Co of MA	6.3%
Plymouth Rock Assurance Co	5.9%
Amica Mutual Ins Co	3.6%
Citizens Ins Co	2.7%
MA Homeland Ins Co	2.5%

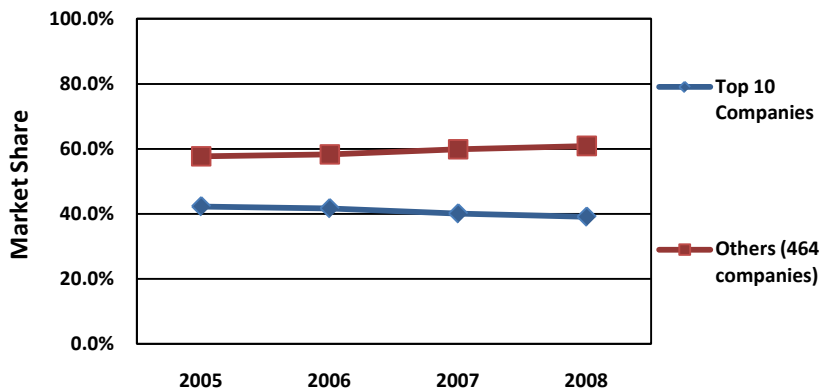
### Top 10 Workers' Compensation Companies



### Top 10 Workers' Compensation Companies

Ins Co of the State of PA	7.6%
Associated Industries of MA Mutual Ins	7.1%
Granite State Ins Co	4.1%
Twin City Fire Ins Co	3.9%
Travelers Property Cas Co of America	3.8%
Liberty Ins Corp	3.8%
Atlantic Charter Ins Co	2.6%
Liberty Mutual Fire Ins Co	2.6%
Liberty Mutual Ins Co	2.4%
American Home Assurance Co	2.4%

### Top 10 Total Property & Casualty Companies



### Top 10 Total Property & Casualty Companies

Commerce Ins Co	12.9%
Safety Ins Co	4.8%
Arbella Mutual Ins Co	4.3%
Liberty Mutual Ins Co	3.9%
Metropolitan Property & Casualty Ins Co	2.9%
Federal Ins Co	2.3%
Premier Ins Co of MA	2.3%
Plymouth Rock Assurance Co	2.1%
Amica Mutual Insurance Co	1.9%
National Union Fire Ins Co of Pitt.	1.8%

## 2 - Significant Events of 2008

### 2.1 Automobile Insurance Reform

For more than three decades, the Division of Insurance set all rates for personal auto insurance in Massachusetts. Under this government imposed rate-setting system, every auto insurance company offered the same price for the same coverage. No competitive pricing was allowed. Consumers could not shop around for lower rates. Insurers complained that the system was complex and unfair. Scores of consumers wrote the Governor's office, the Legislature and the Division of Insurance complaining about the lack of choice.

This absence of choice became progressively worse over the years. From 1990 to 2007, 35 insurance companies stopped offering coverage in Massachusetts and not a single new company entered the marketplace. This left only 19 active auto insurers in the state. At the same time, many other states had well over one hundred insurers. Massachusetts was consistently among the ten most expensive states in which to insure a vehicle.

In 2007, Governor Patrick convened the Automobile Insurance Study Group to make recommendations for reforming the system to increase competition and reduce costs, while ensuring that consumers were treated fairly. The group recommended changes to the system that would introduce competition while keeping prices affordable, minimizing disruptions to the market and maintaining consumer protections. The Commissioner of Insurance issued a decision on July 16, 2007, calling for the gradual introduction of competition in the Massachusetts auto insurance market by April 1, 2008.

Following this decision, a group of Division employees from various departments worked on the logistical tasks of auto reform. During the year, the team successfully:

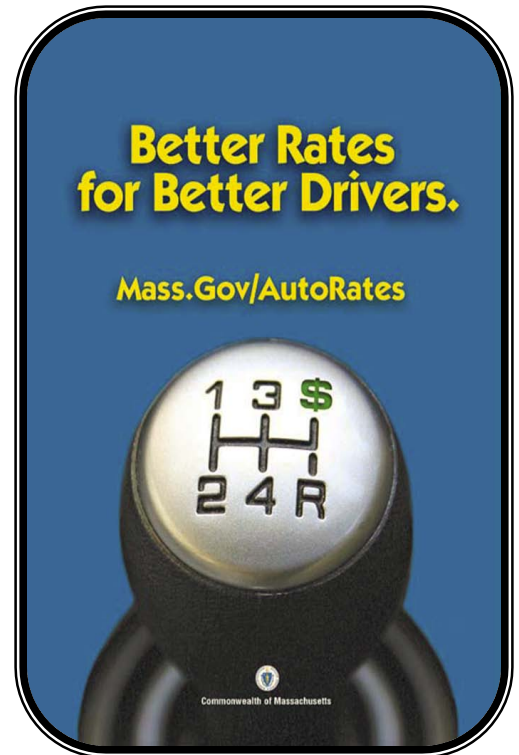
- Designed and implemented a regulatory framework for managed competition in Massachusetts that provides affordable premiums for good drivers, a competitive rating system, and a business environment that attracts new insurers to the state.
- Designed and launched a consumer website that allows users to find sample premium rates and contact information for insurance companies and agents.
- Launched a media campaign to educate consumers on managed competition and the premium reducing options available to them.

## Consumer Assistance

April 1, 2008, was the first time in more than 30 years that Massachusetts consumers had the option of shopping for auto insurance. Consumers who came from other states were eager for this change; but for some drivers who had never purchased coverage outside of Massachusetts, these new choices were confusing. The Division was committed to offering drivers an array of resources to help them navigate this new marketplace.

To assist consumers through this market transition, the Division unveiled a sample premium website that showed consumers the variety of prices and products available to drivers. The Insurance Rate Comparison website, located at [www.mass.gov/autorates](http://www.mass.gov/autorates), launched in February, 2008. Accompanying the launch of the website was the development and launch of the “Better Rates for Better Drivers” marketing campaign. This campaign blanketed various media outlets across the state during the spring of 2008. Consumers using the website discover that there are huge variations in prices and discounts offered by different companies. Hopefully, this motivates them to get serious about calling their agent and start comparison shopping.

The Division supplemented these new web-based shopping tools with additional consumer materials on the InsureMass consumer portal of the Division’s website. New materials included a consumer bill of rights, a list of companies selling auto insurance and a guide specific to the residual market.



## Company Assistance and Rule Changes

With the introduction of managed competition, companies were now permitted to submit their own policy forms and rating plans instead of being required to use standard policy forms and rates. Special one-year transition rules were developed that would facilitate the change and allow Massachusetts residents a wider array of choices already available in most other states. On the first day of managed competition, 20 company groups offered rates and forms in the newly competitive market. During the remainder of the year, four additional companies received approval to offer products in the market.

In addition to introducing competitive rating, the Commissioner also changed the residual market for private passenger automobile insurance to an assigned-risk system. In order to minimize disruption in the market, the Commissioner implemented the residual market change in two stages. In the first year, companies could only decline coverage for new drivers and very high risk drivers. Such drivers could then be assigned coverage through the Massachusetts Assigned Insurance Plan (MAIP).

### Impact of Auto Reform

Near the end of 2008, the Division engaged a consultant to conduct a research study to understand how the new auto insurance market was affecting consumers and the economy. The study was designed to include the perspectives of drivers in every region of the state, with a particular focus on the experiences of minority drivers and drivers from urban or low-income communities. The perspectives of insurance agents and insurance company executives were also included.

The study began in early 2009, and next year's annual report will include the study's detailed findings. Nonetheless, we do know that the first 8 months of managed competition brought about dramatic changes across all facets of the auto insurance marketplace. The bottom line is that consumers are saving money and increasing their coverage; new companies are entering the marketplace and adding jobs; and the residual market is shrinking as drivers are able to find coverage in the competitive market.

### Manuel Carballo Award for Excellence in Public Service



The Division's Private Passenger Automobile Managed Competition Team was selected to receive the Manuel Carballo Governor's Award for Excellence in Public Service as part of the 2008 Performance Recognition Award Program. The award is given annually to no more than ten employees or groups of employees who exemplify the highest standards of public service. A Selection Committee which includes the Speaker of the House, the President of the Senate, and gubernatorial appointees from business, labor, community groups, academia and the media who are knowledgeable about Massachusetts state government reviewed the nominations and recommended to the Governor the names of finalists who are most worthy of receiving the award.

The following Division employees were honored with 2008 Carballo Award: Kevin Beagan, Deputy Commissioner for the State Rating Bureau; Cara Blank, Casualty Actuary; Elizabeth Brodeur, Deputy General Counsel; Mary Carroll, Deputy Commissioner for Administration; Elisabeth Ditomassi, General Counsel; Jean Farrington, Counsel & Hearing Officer; Andrea Guen, Policy Form Review Analyst; Kevin Kroner, Director of External Relations; Tom Smith, former Director of Information Technology; Stephen Sumner, Counsel & Hearing Officer; Mary Ellen Thompson, Counsel; and Kim Haberlin, Director of Communications.

## 2.2 Global Financial Crisis

On September 14, 2008, Lehman Brothers filed for bankruptcy. The following week was marked by extreme instability in global stock markets, with dramatic drops in market values on Monday, September 15, and Wednesday, September 17. On September 16, financial services conglomerate American International Group (AIG) suffered a liquidity crisis following the downgrade of its credit rating. The Federal Reserve subsequently created a credit facility for up to \$85 billion in exchange for a large equity interest. As these news stories broke, calls began to flood the Division of Insurance's consumer hotline from consumers with AIG annuities and life insurance products asking what would happen to their policies if AIG becomes insolvent.

### **Calm in an Otherwise Turbulent Time**

AIG is typically described as the world's largest insurance company. In fact, it is a global financial services corporation that does business in 130 countries. AIG owns 176 other companies, in addition to 71 U.S. insurance subsidiaries. AIG's subsidiary insurance companies remained strong throughout the crisis. This was largely the result of state regulation that protected insurance companies from the high-risk activities of AIG Financial Products. State regulators were actively involved in the AIG liquidity crisis to help ensure that consumers remain protected. Regardless of the failings at AIG's holding-company level, its insurance subsidiaries continued to fulfill their obligations to policyholders.

This series of events focused attention on the role of state insurance regulation on the national economy. Insurance companies are integral capital market participants and are not immune from this unprecedented global economic turmoil. Nonetheless, the business of insurance has not posed a systemic risk to the nation's economy. To the contrary, the insurance portion of the financial service industry has provided a source of relative calm in an otherwise turbulent time. State insurance solvency oversight has kept insurance companies stable and protected policyholders from the worst of the financial meltdown. Throughout this process state regulators continue to provide a local response to consumer issues. Moreover, this protection is entirely funded by the industry itself with no net cost to the taxpayer.



### **State Insurance Regulator's Toolbox**

The stability of the insurance sector was no accident. A state insurance regulator's "toolbox" helps the regulator protect companies from large losses in other parts of the financial sector. Regulatory tools include performing ongoing financial analysis of insurers, and on-site examinations. Commissioners of Insurance across the nation subject insurers to far higher standards than regulators of other portions of the financial services industry. State insurance regulators have numerous actions they can take to prevent an insurer from failing. Insurers must operate under conservative accounting rules and are subject to mandatory annual CPA audits. In addition, state regulators routinely impose strict investment regulations and minimum capital/surplus requirements.

In the rare instance when these regulatory controls fail to safeguard an insurer's financial solvency, additional protections for consumers exist that are unique to the insurance sector. The Commissioner of Insurance can exercise varying degrees of oversight leading up to receivership in order to rehabilitate a troubled company. Claims from individual policyholders are given the utmost priority over other creditors. In the unlikely event that assets are not enough to cover these claims, there is yet another safety net in place to protect consumers: the state guaranty funds. These funds are in place in all states. If an insurance company becomes unable to pay claims, the guaranty fund will provide coverage, subject to certain limits, similar to the FDIC's coverage for bank accounts. This entire solvency framework and safety net for policyholders is uniform in every state and evaluated by the NAIC's Financial Regulation and Accreditation Program.

### **Action in Massachusetts**

In various places in this annual report, you will find references to activities by various departments of the Division of Insurance with respect to the financial crisis. Every year, staff from the Division's Financial Surveillance Unit review quarterly financial filings to monitor the financial health of companies under Massachusetts' jurisdiction. The Financial Examinations Section provide an in-depth analysis of virtually all aspects of a company's financial records and statements in order to assure compliance with state laws and regulations. Examiners in the Consumer Services Section handled more than 150 calls on AIG solvency in just the first week of the crisis. Throughout the remainder of 2008, these examiners helped consumers understand the nature of the risk and protections that are in place to safeguard their policies.

While the financial industry continues to face serious difficulties, the untold story of 2008 – and continuing in 2009 - is the success of state based insurance regulation.



## 3 - Administration

### 3.1 Mission

The Administration Department is responsible for providing Division of Insurance employees with various operational and administrative services. It ensures that other departments have the necessary resources to carry out the regulatory mission of the agency.

The Administration Department's mission is to ensure:

- The availability of adequate funding to carry out the Division mission
- The efficient, accurate and secure receipt of revenue associated with fees, fines and assessments
- Communication of, and compliance with, federal, state and collective bargaining labor requirements
- The availability of knowledgeable, motivated and trained human resources capable of carrying out the Division mission
- The timely payment of all Division fiscal obligations
- The best value procurement of goods and services
- The safety and security of employees, visitors and property
- The comfort of Division employees and visitors

### 3.2 2008 Goals

- Complete a review of agency policies and procedures concerning the security of personal and confidential data and - if necessary - adopt and implement the maximum feasible measures needed to ensure the security, confidentiality, and integrity of personal information.
- Ensure that OLLIE II, which allows Business Entity Producers to renew their licenses online, is completed on time and on budget.
- With the Insurance Rate Comparison Project Team, ensure the successful design, development and launch of an Insurance Rate Comparison website by March, 2008. The site seeks to educate consumers on how to shop for competitive auto insurance rates in the new managed competition environment.
- As part of the project team, create a media campaign around the launch of managed auto competition and the Insurance Rate Comparison website. Create a media strategy that includes radio advertisements, television advertisements, mass transit posters, etc. aimed at informing consumers on the "Better Rates for Better Drivers" concept.
- Implement the internal process requirements allowing the receipt of electronic fee payments from insurance companies utilizing the electronic form and rate filing submission system known as SERFF.

Ongoing

Complete



Complete



Complete



Complete



**Complete**

- Plan, organize and execute a management planning seminar for Division leadership that invites industry, academic, advocacy, policymaking and consumer protection experts to share their views on future trends in the insurance industry.

**Complete**

- In preparations for the expiration of the agency's lease in 2010, document the Division's program, personnel and space requirements and submit data to Department of Capital Asset Management for the issuance of a Request for Proposals.

**Complete**

- Adopt a mail services program that reduces postage costs up to 9%.

**Complete**

- Report on the agency's progress toward completing its Affirmative Action and Diversity goals as outlined in its 2008-2009 Plans.

**Complete**

- Complete billing of assessments according to timelines so as to ensure collection of all open receivables before year-end and compliance with state Comptroller guidelines and Division internal control plan.

**Complete**

- Collect all revenue in a timely and accurate way. Ensure compliance with state comptroller guidelines and Division internal control plan.

**Complete**

- Complete all hiring and staffing requests in a timely manner so as to ensure available human resources to carry out the Division mission.

**Complete**

- Guide agency users in drafting and issuing Requests for Responses for various professional services. Assist in evaluating and selecting vendors. Ensure procurements are completed in compliance with Operational Services Division requirements.

**Complete**

- Coordinate in-house training for agency personnel on the conflict of interest law, workplace/domestic violence prevention, sexual harassment prevention, the Americans with Disabilities Act, and the Family and Medical Leave Act.

### 3.3 Primary Activities

#### Insurance Rate Comparison Website (IRC) and the “Better Rates for Better Drivers” Media Campaign

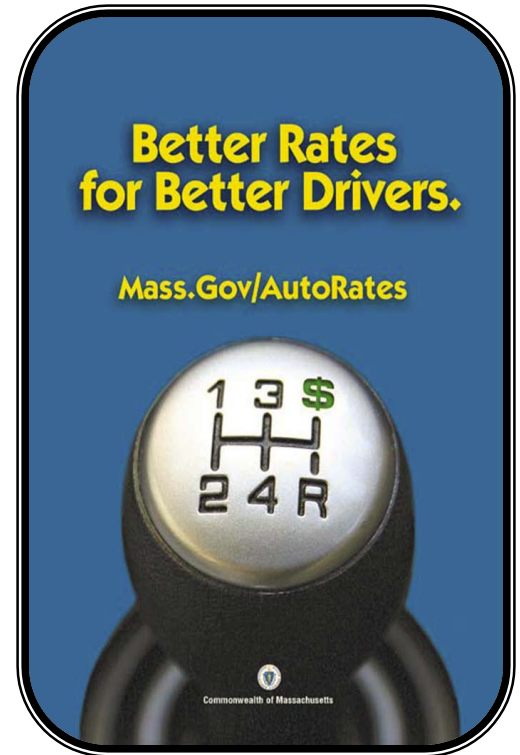
Following the Commissioner’s decision to introduce competition into the automobile insurance market, a group of Division employees from various disciplines came together to work on in order to bring the goals of managed competition to fruition. During the next year, the Private Passenger Auto Managed Competition Team would:

- Design and implement a regulatory framework for managed competition providing affordable premiums for good drivers, a competitive rating system, and a business environment that attracts new insurers to the state
- Design and launch a consumer website known as the Insurance Rate Comparison Website, allowing users to find sample premium rates and contact information for insurance companies and agents
- Design and launch a media campaign, known as “Better Rates for Better Drivers”, educating consumers on managed competition and the premium reducing options available to them

To ease consumers through a confusing shift in the marketplace, the Team decided to develop an online web tool with which consumers could find information on the insurance companies selling auto insurance, sample premiums offered by each company, and information on whom to contact to purchase auto insurance. The launch of the website would be accompanied by a media campaign that would draw attention to the changes and the new options available to consumers.

The Insurance Rate Comparison website, located at [www.mass.gov/autorates](http://www.mass.gov/autorates), launched in February 2008 after weeks of software development and testing, meetings with industry personnel and consumer advocate groups, and the development and launch of the “Better Rates for Better Drivers” marketing campaign which blanketed various media outlets across the state during the Spring of 2008. Consumers answer a few simple questions on the website and the site generates a list of sample premiums offered by each of the state’s insurers. The site instructs consumers to contact an agent or company to obtain an actual rate quote. By clicking on the site’s “AgentFinder” feature, consumers can easily connect with insurance professionals in their area. Consumers using the website discover that there are huge variations in prices and discounts being offered by different companies and this motivated them to get serious about calling their agent and start comparison shopping.

The Division’s Private Passenger Automobile Managed Competition Team was selected to receive the Manuel Carballo Governor’s Award for Excellence in Public Service as part of the 2008 Performance Recognition Award Program.



[www.mass.gov/autorates](http://www.mass.gov/autorates)



## Security and Confidentiality of Data

### Executive Order 504

Executive Order 504, *An Order Regarding the Security and Confidentiality of Personal Information*, was adopted and made effective on September 19, 2008. The order requires executive department agencies to "...adopt and implement the maximum feasible measures reasonably needed to ensure the security, confidentiality, and integrity of personal information as defined in the Security Freezes and Notification of Data Breaches Statute (M.G.L. c. 93H), and personal data as defined in the Fair Information Practices Act (M.G.L. c. 66A)." Together with the Secretariat Chief Information Officer, and the Division's Information Technology and Legal Departments, the Administration Department took steps to ensure compliance with the Executive Order in accordance with its implementation timetable. In 2008, the agency began utilizing the Mandatory Procurement Standards and Procedures for all contracts solicited for IT solutions that involve personal information or personal data. The Division also appointed an agency Information Security Officer (ISO). In 2009, the agency will implement the remaining mandates of Executive Order 504 as required by the Information Technology Division.

### Data Breach Policy

Chapter 82 of the Acts of 2007, *The Security Freezes and Notification of Data Breaches Act*, established measures to protect consumers' personal information and to provide them with timely disclosure and remedial tools so that they can take steps to minimize the threat of identity theft if their personal information is breached. Safeguarding personal information in the possession of the government is essential to preserving the public's trust in government. In 2008, the Division developed a Personal Information Privacy Policy and Breach Notification Policy to minimize risk and ensure that prompt and appropriate action is taken should a breach occur.

### PCI Compliance

In 2007, the Office of the State Comptroller issued a memorandum relating to Payment Card Industry (PCI) Data Security Standards (DSS) compliance, a mandatory program of the major credit card associations to create common industry security requirements for cardholder data. According to the Comptroller, all Commonwealth entities that process, transmit or store cardholder data are required to adhere to certain data security standards mandated by the credit card associations. The primary focus of the PCI standards is to help merchants - in our case, Commonwealth Departments - improve the safekeeping of cardholder information by tightening overall security standards. This overall review reduces the chances of experiencing security breaches, fraud and potential catastrophic financial losses, penalties and loss of trust in Commonwealth public facing applications.

The PCI Security Standards Council mandates compliance of certain information security requirements for any merchant that "transmits, stores, accesses, or processes" cardholder information. Merchants found to be non-compliant with the respective security requirements may be subject to substantial fines and penalties in the event of a data breach.

Although the Division does not transmit, store, access or process credit card information at this time, the agency deemed it prudent to pursue compliance with PCI DSS for the Automated Clearing House transactions processed by its OLLIE and OPRA websites and to assess whether the agency is well poised to begin accepting credit cards at some point in the future. In December 2008, the Office of Consumer Affairs agencies, including the Division of Insurance, engaged a Qualifying Security Assessor (QSA) to verify that adequate personal identity and financial protection exists for citizens and businesses who choose to conduct electronic business with the Commonwealth, and to minimize the significant financial and reputation exposure resulting from fines and penalties imposed as a result of a security breach.

### **OLLIE (Online Licensing of Individuals and Entities), Phase II**

In 2008, a project team including members of the Information Technology, Producer Licensing and Administration sections, successfully enhanced the functionality of the OLLIE website to provide business entity producers the ability to renew their licenses online. OLLIE is the Division's Online Licensing of Individuals and Entities system, which originally launched in 2007. It is a state-of-the-art system offering insurance producers the opportunity to renew their licenses online, as well as the ability to update their licensing profile with product and sales information that may be helpful to consumers. This producer profile information populates the AgentFinder website, which connects consumers to insurance professionals based on criteria provided by the consumer. AgentFinder allows consumers to generate a list of agents from a database of the state's 70,000 licensed insurance professionals based on the geographic, product and company specifications that he or she selects. With the enhancements achieved in 2008, consumers can now find an insurance agency based on the same search criteria, in addition to its branch office locations.



The license renewal process was once a paper intensive process. Hundreds of Massachusetts residents now choose OLLIE for the speed, precision and efficiency its online features offer. OLLIE was made available to business entities in December 2008 and initial results indicate that it is being adopted at twice the rate as the individual renewal site. During the first full month the site was available to business entities, some 65% of them chose to renew their licenses online. Data indicates that an average of 30% of individual producers are opting to renew online with OLLIE.

## 4 - Financial Surveillance & Company Licensing

### 4.1 Mission

The primary mission of the Financial Surveillance and Company Licensing Section is to monitor the financial solvency of insurers participating in the Massachusetts domestic insurance marketplace in order to provide a healthy and competitive insurance market.

### 4.2 Goals



**Complete**

- Monitor the solvency of all insurance companies domiciled in the Commonwealth of Massachusetts. Complete quarterly and annual analysis of all files within the deadlines delineated in the NAIC Accreditation Guidelines. Hold annual meetings with senior company management, Audit Committees, and Boards of Directors.



**Complete**

- Maintain Accreditation by the National Association of Insurance Commissioners (NAIC). The NAIC Accreditation program provides a process whereby solvency regulation of multi-state insurance companies can be enhanced and adequately monitored with an emphasis on: adequate solvency laws and regulations in place to protect consumers as well as guarantee funds; effective and efficient financial analysis and examination processes; and, appropriate organizational and personnel practices.



**Complete**

- Process license applications - including license amendment applications - from insurance companies seeking to transact insurance business in the Commonwealth to provide for a solvent and competitive insurance market.



**Complete**

- Oversee transactions such as mutualizations, demutualizations, issuance of surplus contribution notes, issuance of capital, mergers & acquisitions, quasi-reorganizations, additional reserving requirements, good corporate governance practices, and prudent conservative accounting standards.



### 4.3 Primary Activities

The Financial Surveillance and Company Licensing staff processes license certifications, analyzes annual statement filings and manages other revenue collections that resulted in approximately \$600,000 in revenue in 2008.

#### Financial Surveillance

The Financial Surveillance Unit monitors the solvency of domestic and foreign (domiciled in another state) insurance companies. There are currently 1,448 insurance companies licensed or authorized to transact insurance business in the Commonwealth. Included in this number are life insurers, accident & health insurers, property & casualty insurers, health maintenance organizations, fraternal benefit societies, title insurers, risk retention groups, self-insurance groups, surplus lines insurers, reinsurers, home warranty contract providers and viatical settlement companies. Financial Surveillance also monitors transactions entered into by Massachusetts' domestic insurers.

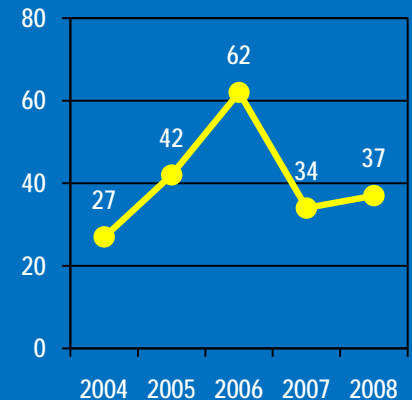
As of December 31, 2008, there were 91 insurance companies domiciled in Massachusetts. A comprehensive "desk audit" of each of these companies was completed by an analyst and reviewed by a manager. These desk audits consist of over 20 detailed analyses for each company. They include an in-depth review of the Annual Statement including the investment portfolios, the reinsurance portfolios, reserving analyses, income statement, cash flow statements and balance sheets. Additionally, the Statement of Actuarial Opinion, the Management's Discussion & Analysis, Holding Company filings and independent CPA Audit are reviewed in great detail. Lastly, each domestic insurer files a quarterly statement similar to the Annual Statement that is reviewed in detail. These various tasks help the Division closely monitor the solvency of the company. The national ratings of each domestic insurer are monitored and tracked as well. During the fourth quarter of 2008, an additional emphasis was placed on troubled securities and the performance of the investment portfolios.

#### Company Licensing

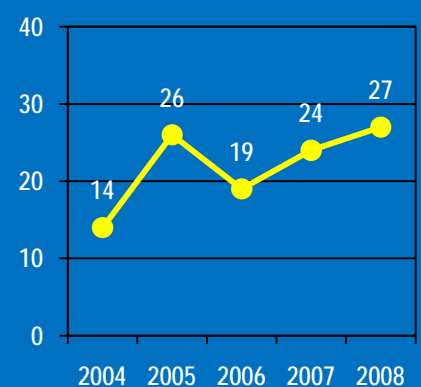
The Company Licensing staff reviews and processes all applications from insurers seeking to obtain or amend licenses to transact insurance business in the Commonwealth.

The Section evaluated license and amended license applications for companies desiring to establish or expand an insurance business in Massachusetts in accordance with Massachusetts law and regulations. The Division participates in the NAIC Uniform Certificate of Authority application process. The UCAA application consists of fourteen parts that allow the Division to review the applicant's solvency, management team, and experience in the insurance industry. Information compiled by the NAIC, as well as input from the domestic regulators, is included in the review process.

**Five Year Trends:  
New Licenses**



**Five Year Trends:  
Amended Licenses**



During 2008, the Financial Surveillance Unit issued twenty-five new insurance company licenses, twenty-seven amended insurance company licenses, approved nine companies as authorized surplus lines insurers, approved two companies as accredited reinsurers, and issued a Certificate of Authority to one home warranty company.

New Licenses		
Property & Casualty Insurers	Life, Accident & Health Insurers	Surplus Lines
Accident Fund General Insurance Company	Accendo Insurance Company	Acceptance Indemnity Insurance Company
Accident Fund National Insurance Co.	Brokers National Life Assurance Co.	Alamance Insurance Company
AIG Advantage Insurance Company	Envision Insurance Company	Century Surety Company
Allied World National Assurance Co.	Security Life Ins. Co. of America	Cincinnati Specialty Underwriters Ins Co.
AutoOne Insurance Company	SilverScript Insurance Company	CUMIS Specialty Insurance Company
Berkshire Hathaway Assurance Corp.	United Security Assurance Company of PA	Guilford Insurance Company
Employers Security Insurance Company	Unity Financial Life Insurance Co.	Omega US Insurance Inc.
Generali US Branch		Prime Insurance Company
Guarantee Co. of North America USA	Health Insurers	Protective Specialty Insurance Company
Homesite Insurance Co. of the Midwest	Boston Medical Center Health Plan, Inc.	
Hospitality Mutual Insurance Company		Home Warranty Companies
PACO Assurance Company, Inc.	Title Insurers	AMT Warranty Corporation (Home Warranty)
Premier Group Insurance Company	Guardian National Title Insurance Company	
Progressive Commercial Casualty Company		Accredited Reinsurers
Progressive Direct Insurance Company		Congress Life Insurance Co.
Tri-State Insurance Company of Minnesota		Starr Indemnity & Liability Co. (fka Republic)
Union Standard Insurance Co.		
Utica First Insurance Company		
Amended Licenses		
Property & Casualty Insurers	Life, Accident & Health Insurers	
American Pet Insurance Company, Inc.	Massachusetts Homeland Insurance Company	New York Life Insurance Company
Bay State Insurance Company	Merrimack Mutual Fire Insurance Company	
Berkley Regional Insurance Company	Midwest Employers Casualty Company	
Sparta Insurance Company	National Casualty Company	
Cambridge Mutual Fire Insurance Co.	ProCentury Insurance Company	
Fidelity National Insurance Company	Sompo Japan Insurance Co. of America	
General Fidelity Insurance Company	State National Insurance Company	
Great Divide Insurance Co.	Technology Insurance Company	
Heritage Casualty Insurance Co.	Vermont Mutual Insurance Company	
Hiscox Ins. Co. (fka American Livestock Ins. Co.)	Wesco Insurance Company	
Hudson Insurance Company	Westport Ins Corp (Employers Reins Corp)	
Jefferson Insurance Company	Western Diversified Casualty Insurance Company	
Main Street America Assurance Company	Zale Indemnity Company	



## 4.4 Special Activities

There were several new Massachusetts domestic insurers created and licensed during 2008. These included the following:

- **Employers Security Assurance Company**  
Employers Security Assurance Company received their Certificate of Authority on January 17, 2008
- **Hospitality Mutual Insurance Company**  
Hospitality Mutual Insurance Company received their Certificate of Authority on June 30, 2008.
- **Boston Medical Center Health Plan**  
Boston Medical Center Health Plan received a conditional Certificate of Authority on October 31, 2008.
- **John Hancock Life & Health Insurance Company**  
John Hancock Life & Health Insurance Company applied to redomesticate from Delaware to Massachusetts. This transaction was approved and the company redomesticated to Massachusetts effective January 1, 2009.

There were several Massachusetts domestic insurers involved in significant transactions during 2008. These included the following:

- **Great-West Healthcare of Massachusetts, Inc.**  
Great-West Healthcare of Massachusetts, Inc., surrendered their Certificate of Authority effective January 11, 2008.
- **Berkshire Mutual Insurance Company**  
Berkshire Mutual Insurance Company surrendered their Certificate of Authority effective October 20, 2008.
- **First Allmerica Financial Life Insurance Company**  
First Allmerica Financial Life Insurance Company was acquired by Commonwealth Annuity and Life Insurance Company in a transaction that was approved by the Division on December 30, 2008. The transaction closed January 2, 2009.

## 5 - Financial Examinations

### 5.1 Mission

The mission of the Financial Examination Section is to perform statutory examinations of Massachusetts domestic insurers in order to assure the financial health of these companies and thereby protect consumers purchasing insurance products.

### 5.2 Goals

 **Complete**

- Conduct financial audits of domestic insurance companies in order to ensure that policyholders' and claimants' rights are protected and fulfilled, and that insurance consumers can do business with financially solvent companies.

 **Complete**

- Maintain accreditation by the National Association of Insurance Commissioners (NAIC). Impose qualitative standards in the regulation of insurance. Ensure that our domestic insurance companies operate and provide insurance coverage to policyholders and consumers with the least amount of regulatory oversight and involvement from other U.S. jurisdictions, and thus with the least amount of cost to them.

 **Complete**

- Conduct financial audits in compliance with the NAIC Financial Condition Examiners Handbook to ensure for timely and regular examination reviews that are based on a substantive "risk based assessed" audit approach toward proper allocation of examination resources within the financial operations of our domestic insurance companies.

 **Complete**

- Foster an environment that will allow our domestic insurance companies to compete effectively with their peers throughout the country and the world.

## 5.3 Primary Activities

### Financial Examinations

Financial examinations are conducted in accordance with standards established by the Financial Condition (E) Committee of the NAIC as well as with the requirements of the NAIC Financial Condition Examiner's Handbook, the Division's own examination standards and Massachusetts General Laws. The principal focus of an examination is the most recent calendar year's activity; however, transactions both prior and subsequent to the "as of" examination date are reviewed when appropriate.

In addition to a review of the financial condition of the insurer, examinations include a review of the company's:

- Business policies and practices
- Corporate records
- Reinsurance programs
- Conflict of interest disclosure statements
- Fidelity bonds and other insurance
- Employees' pension and benefits plans
- Disaster recovery plan
- Treatment of policyholders

In addition to this list, the review includes other pertinent matters in order to provide a reasonable assurance that the company is in compliance with applicable laws, rules, and regulations. In planning and conducting an examination, consideration is given to the concepts of materiality and risk, and examination efforts are directed accordingly.

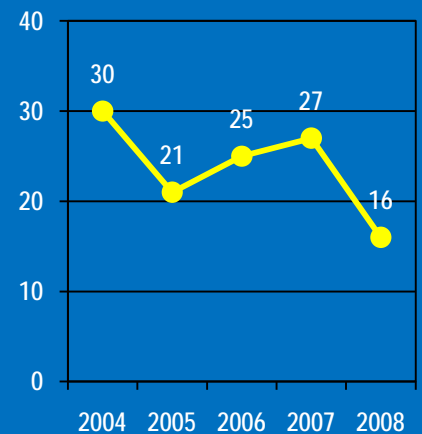
In 2008, the Financial Examination Section completed routine statutory examinations of sixteen insuring organizations. These companies produced \$8.3 billion in premium nationwide - \$6.8 billion in Massachusetts. The section also continued its special purpose examinations of domestic managed care organizations to evaluate their premium rate setting processes.

The NAIC Financial Regulation Standards & Accreditation (F) Committee has a standard known as the "18 Month Rule." This standard establishes a general rule that comprehensive financial examinations conducted by state insurance departments should be completed and reports issued within eighteen months of the "as of" date of the examination. Exceptions to this rule are permitted for reasonable justification and an extension of up to twenty-two months is allowed before the state is required to roll the "as of" date of a re-initiated exam forward one year.

### 2008 Statutory Examinations

Life, Accident & Health Insurers	1
Property & Casualty Insurers	8
Insurance Associations	2
Self-Insured Groups	1
Health Organizations	4

### Five Year Trends: Completed Examinations



The Financial Examination Section conducted fifteen full-scope financial examinations with an “as of” date of December 31, 2006. All of these examinations were completed by June 30, 2008, within the “18 Month Rule” timeframe noted above.

Twenty-four insurance examinations were in progress at year’s end, representing \$10.9 billion in premium nationwide - \$3.7 billion in Massachusetts.

Examination Reports Issued in 2008			
	US Direct Premium	MA Direct Premium	Surplus
<b>Property &amp; Casualty Insurers</b>			
American Employers Ins. Co. (One Beacon Group)	\$0	\$0	\$35,210,000
Coface North America Insurance Company	\$39,543,000	\$2,236,000	\$17,420,000
Electric Insurance Company	\$316,155,000	\$31,362,000	\$331,800,000
Employers Fire Insurance Co (One Beacon Group)	\$384,130,000	\$94,924,000	\$61,274,000
Holyoke Mutual Insurance Co. in Salem	\$35,079,000	\$24,123,000	\$72,413,000
MA Homeland Ins. Co. (One Beacon Group)	\$125,249,000	\$125,249,000	\$9,282,000
Northern Assur Co of America (One Beacon Group)	\$236,516,000	\$10,196,000	\$191,951,000
OneBeacon America Ins. Co. (One Beacon Group)	\$550,854,000	\$38,841,000	\$520,891,000
<b>Health Insurers</b>			
Blue Cross Blue Shield of Massachusetts, Inc.	\$2,098,280,000	\$2,098,280,000	\$628,188,000
Blue Cross Blue Shield of Massachusetts HMO Blue	\$4,239,167,000	\$4,239,167,000	\$839,662,000
Great West Healthcare of Massachusetts, Inc.	\$0	\$0	\$1,558,000
Massachusetts Vision Service Plan	\$11,615,000	\$11,615,000	\$9,797,000
<b>Life, Accident &amp; Health Insurers</b>			
Boston Mutual Life Insurance Company	\$230,416,000	\$50,606,000	\$89,411,000
<b>Self Insured Groups</b>			
MIIA Property and Casualty Group, Inc.	\$42,891,000	\$42,891,000	\$91,995
<b>Other</b>			
Liquor Liability Joint Underwriting Association	\$6,069,000	\$6,069,000	\$17,406,000
Massachusetts Medical Malpractice Reinsurance Plan	\$9,265,000	\$9,265,000	(\$22,709,000)
<b>TOTALS</b>	<b>\$8,325,229,000</b>	<b>\$6,784,824,000</b>	<b>\$2,895,549,000</b>

## Examinations in Progress as of 12/31/2008

	US Direct Premium	MA Direct Premium	Surplus
<b>Property &amp; Casualty Insurers</b>			
Arrow Mutual Insurance Co.	\$7,548,000	\$7,319,000	\$29,055,000
Bunker Hill Ins. Co. (Plymouth Rock Group)	\$38,811,000	\$33,215,000	\$19,971,000
Pilgrim Ins. Co. (Plymouth Rock Group)	\$59,133,000	\$59,133,000	\$10,220,000
Plymouth Rock Assurance Co. (Plymouth Rock Group)	\$238,699,000	\$225,381,000	\$122,412,000
<b>Health Insurers</b>			
Dental Service of Massachusetts	\$357,179,000	\$357,179,000	\$153,890,000
Fallon Community Health Plan, Inc. (Fallon Group)	\$438,481,000	\$438,481,000	\$171,470,000
Fallon Health & Life Assur. Co. (Fallon Group)	\$8,492,000	\$8,492,000	\$3,620,000
HPHC Insurance Co. (Harvard Pilgrim Group)	\$1,874,216,000	\$1,803,871,000	\$373,473,000
HPHC of New England, Inc. (Harvard Pilgrim Group)	\$321,598,000	\$0	\$28,621,000
HPHC, Inc. (Harvard Pilgrim Group)	\$91,686,000	\$47,264,000	\$23,510,000
<b>Life, Accident &amp; Health Insurers</b>			
John Hancock Life Ins. Co. (John Hancock Group)	\$4,363,283,000	\$339,782,000	\$4,077,485,000
John Hancock Var. Life Ins. Co. (John Hancock Group)	\$1,094,513,000	\$64,620,000	\$606,935,000
New England Life Ins. Co.	\$2,000,855,000	\$221,316,000	\$541,737,000
<b>Self Insured Groups</b>			
Mass Govt and Educ Self-Insured Group	\$15,189,000	\$15,189,000	\$11,257,000
Mass. Bay Self-Insured Group	\$2,358,000	\$2,358,000	\$444,000
Mass. Catholic Self-Insured Grp	\$5,412,000	\$5,412,000	\$5,777,000
Commonwealth Transportation Comp. Corp.	\$3,346,000	\$3,346,000	\$0
Construction Industries Compensation Corp.	\$3,177,000	\$3,177,000	\$0
Graphic Arts Compensation Corporation	\$1,002,000	\$1,002,000	\$0
Independent Schools Compensation Corp	\$7,812,000	\$7,812,000	\$0
Manufacturers of Mass. Comp. Group, Inc	\$2,229,000	\$2,229,000	\$0
Self-Insured Lumber Business Assoc., Inc.	\$6,874,000	\$6,874,000	\$42,000
Wholesale/Retail Suppliers Comp. Corp	\$2,761,000	\$2,761,000	\$0
<b>Fraternal Organizations</b>			
Catholic Assn of Foresters	\$252,000	\$197,000	\$6,832,000
<b>TOTALS</b>	<b>\$10,944,906,000</b>	<b>\$3,656,410,000</b>	<b>\$6,186,751,000</b>

### **Special Brokers Tax Collection**

The Financial Examination Section collects state taxes on the Excess and Surplus Lines business written by Special Brokers licensed in Massachusetts. Collections in calendar year 2008 for business written in calendar year 2007 totaled \$25.3 million on written premium of \$631.7 million.

### **Life Company Certification and Valuation Fees Collection**

At the end of each calendar year, Division financial examiners are charged with compiling the actuarial valuations of insurance reserves of Massachusetts domiciled life insurance companies as described in the annual financial statements and the actuarial reserve exhibits. These valuations are reviewed in context with the actuarial opinions provided by the companies - including asset adequacy testing required on these reserves. The Division then issues a certification of the company's entire reserve liability. Under Massachusetts law, the companies are required to pay fees for the annual valuation process and for the certificates issued. Valuation and certification fees billed in 2008 amounted to \$652,000.

## **5.4 Special Activities**

### **Training & Professional Accomplishments**

Three Section managers attended the Society of Financial Examiner's (SOFE's) annual Career Development Seminar (CDS) on August 2008. SOFE is a professional society made up of insurance examiners throughout the U.S. and its territories. Through lectures, roundtable discussions and interactive formats, seminar participants learn the latest developments, current and emerging issues and new techniques in the regulation of insurance companies. Topics also include the new risk-focused examination approach, fraud detection, IT development and the latest legislation, auditing and regulatory issues.

Two managers attended the Annual NAIC Financial Summit on Oct 28 – 29, 2008. This annual training event covered a variety of regulatory topics including financial reporting and statutory accounting updates, principles-based reserving techniques, reinsurance, catastrophic risk updates, international and investments issues, legal and IT issues with financial impact, plus the current economic climate and solvency regulation.






In 2008, one of the section's Supervising Examiners achieved the distinction of being awarded the Certified Financial Examiner (CFE) professional designation from the Society of Financial Examiners (SOFE). One of the section's Senior Examiners achieved the distinction of being awarded the Accredited Financial Examiner (AFE) professional designation from SOFE. The CFE designation is the ultimate goal of the SOFE credentialing program, while the AFE designation is a prerequisite to achieving the ultimate goal of Certified Financial Examiner. All managers in the Financial Examination section are Certified Financial Examiners and/or Certified Public Accountants.

## 6 - Market Conduct

### 6.1 Mission

The primary mission of the Market Conduct Section is to perform examinations and reviews of insurance carriers to ensure the fair treatment of policyholders in the Massachusetts insurance marketplace. Examinations involve the review of company records and practices relating to sales, advertising, rating, underwriting, claims and complaint handling. Market Analysis Reviews consist of an annual evaluation of various regulatory data covering select companies doing business in Massachusetts. Review of this regulatory data allows the Section to understand the current state of the marketplace and identify possible areas of regulatory intervention. The Market Conduct Section looks at the treatment that consumers receive from insurance companies in order to assure compliance with the terms and conditions of the insurance contract, as well state laws, regulations and bulletins.

### 6.2 Goals

- |  |  |
|--|--|
| <ul style="list-style-type: none"> <li>• Monitor insurers and industry trends. Analyze the impact on consumers and the insurance marketplace of those trends and determine whether regulatory intervention or oversight is appropriate.</li> </ul> | Complete    |
| <ul style="list-style-type: none"> <li>• Monitor the progress of multi-state regulatory settlement agreements in which the Massachusetts Division of Insurance is a lead state negotiator.</li> </ul>  | Complete  |
| <ul style="list-style-type: none"> <li>• Determine whether multi-state regulatory settlement agreements negotiated by other states are fair to Massachusetts consumers.</li> </ul>   | Complete  |
| <ul style="list-style-type: none"> <li>• Maintain a market conduct examination program in accordance with guidelines of the Division of Insurance and the NAIC.</li> </ul>   | Complete  |
| <ul style="list-style-type: none"> <li>• Conduct sufficiently planned, timely administered and substantive market conduct examinations with qualified and trained professionals.</li> </ul>  | Complete  |

### 2008 Comprehensive Examinations

- Arbella Mutual Insurance Company
- Arbella Indemnity Insurance Company
- Arbella Protection Insurance Company
- Boston Mutual Life Insurance Company
- Commonwealth Mutual Insurance Company
- Employers Fire Insurance Company
- Massachusetts Homeland Insurance Company
- Northern Assurance Company of America
- OneBeacon America Insurance Company

### 2008 Limited-Scope Examinations

- American Automobile Insurance Company (SDIP)

### 2008 Multi-State Examinations

- Boston Mutual Life Insurance Company (military sales)
- UNUM Group (disability claims)

## 6.3 Primary Activities

### Examinations and Reviews

The market conduct examination process allows the Division to ensure that policyholders and consumers are treated fairly and in accordance with both the terms of the insurance contract and state law or regulation. In some instances, a completed market conduct examination results in corrective action in order to fix past violations and to prevent future violations.

In 2008, the Market Conduct Section completed ten domestic market conduct examinations which evaluated:

- Company operations and management
- Timely and fair complaint handling
- Marketing and sales practices
- Appointment and licensing of producers
- Underwriting and rating guidelines and practices
- Claims handling and settlement practices

Market Conduct examinations may be either comprehensive or limited-scope. Six comprehensive and twenty-one limited-scope examinations of domestic insurers were in progress as of the end of 2008.

In addition to domestic examinations, the Market Conduct Section participates – and sometimes leads – multi-state examinations. In 2008, the Division was the lead examiner on two completed multi-state examinations. In each instance, the Company was found to be compliant with the terms of the regulatory settlement agreement it executed with the Division and participating states.

One multi-state examination, with the Division as a lead state examiner, was in progress as of the end of 2008.

### Market Analysis

In 2008, the Market Conduct Section completed 61 market analysis reviews on 42 companies for eight lines of business. Market analysis reviews consist of assessing data from a variety of sources, such as the NAIC complaint database, the NAIC regulatory information retrieval system, the NAIC market initiative tracking system, and company financial statements. They provide an early warning mechanism used to identify non-compliance with insurance laws and regulations, and negative financial trends which may impact future claims payments.



## Settlement Monitoring

As a result of examinations that were previously conducted by the Market Conduct Section, the Division monitored various regulatory settlement agreements throughout 2008.

- **UNUM Group**

The UNUM settlement concerned improper claims handling (i.e. denials or termination of payments) with respect to group and individual disability income policies. Thus far, approximately \$682,000,000 has been paid to claimants, or placed in reserve for future payments on a national basis. Approximately \$13,600,000 has been paid or placed in reserve for future payments to Massachusetts claimants.

- **Boston Mutual Life Insurance Company**

The Boston Mutual settlement covered improper life insurance sales to military personnel – primarily the failure to conduct a needs assessment before sale. Approximately \$435,000 is to be refunded to military personnel on a national basis, including \$1,500 to military personnel from Massachusetts.

- **HealthMarkets, Inc.**

The HealthMarkets settlement involved the improper claims handling practices of health insurers under plan certification and riders – primarily the failure to pay benefits fairly and equitably. Thus far, approximately \$840,000 has been paid to Massachusetts claimants.

In 2008, the Market Conduct Section participated in a multi-state settlement of a foreign insurer, Conseco Group (Bankers Life and Casualty Insurance Company and Conseco Senior Health Insurance Company), in which a \$15,000 fine was paid to the Commonwealth. The multi-state examination found errors in complaint handling, marketing and sales and long term care claims handling.

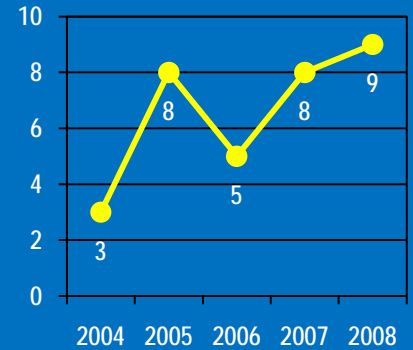
## Company Reports

In 2008, the Market Conduct Section reviewed potential violations self-reported by two companies involving annuities. These self-reports resulted in benefits of approximately \$225,000 paid to Massachusetts consumers.

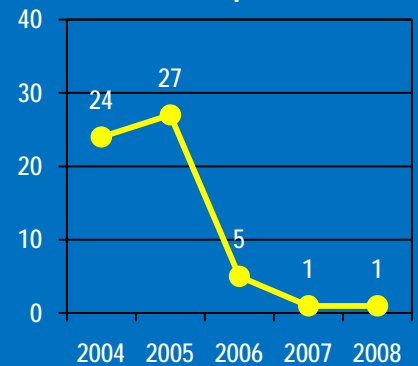
## Additional Reviews

The Market Conduct Section regulates 225 risk purchasing groups by registering new groups and renewing the registration of existing groups. In 2008, approximately \$34,000 in fees was collected from the risk purchasing groups. In addition, the Section reviews and analyzes the financial statements of 24 workers' compensation self-insured groups in order to ensure the solvency of each group

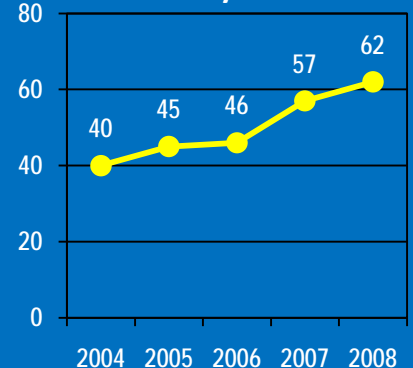
**Five Year Trends:  
Comprehensive Exams**



**Five Year Trends:  
Limited Scope Exams**



**Five Year Trends:  
Market Analysis Reviews**



## 7 - Producer Licensing

### License Types

- Producers
- Advisers
- Auto Clubs & Auto Club Agents
- Bank Insurance Licenses
- Public Insurance Adjusters
- Reinsurance Intermediaries (brokers & managers)
- Surplus Lines Brokers
- Viatical Settlement or Loan Brokers
- Viatical Representatives
- Motor Vehicle Damage Appraisers

The Producer Licensing Department is responsible for the licensing of all individual and business entities in the business of insurance. The Department also issues Certification Letters, Clearance Letters, and duplicate or replacement licenses.

In particular, the Department processes all new license applications and renewal applications associated with more than ten license types.

### 7.1 Mission

- Ensure that individuals and business entities conducting the business of insurance in Massachusetts are qualified and in good standing, and that they conduct business within the requirements of the laws and regulations of the Commonwealth
- Monitor the proper testing, implementation and enhancements of the new online licensing procedures for accuracy
- Process all licensing applications in a timely and accurate manner
- Respond to all licensing inquiries in a timely and accurate manner
- Provide excellent customer service to our licensees
- Properly train staff members to carry out mission of the Producer Licensing Department and that of the Division of Insurance

### 7.2 2008 Goals



**Complete**

- Ensure the successful completion of the Producer Licensing online project – OLLIE II. This goal includes writing business rules for the new system.



**Complete**

- Ensure that the Online Producer Appointment (OPRA) renewal website is operational by mid-October, with insurers renewing within 45 days. The OPRA site went live on October 3, 2008 - one month soon than the previous year.



**Complete**

- Cross-train Department staff members on licensing procedures for 90% of all license types, including all aspects of online services.



**Complete**

- Train Department staff members on all aspects of OLLIE II.

## 7.3 Primary Activities

### Online Licensing of Individuals and Entities - OLLIE

OLLIE is an online insurance licensing system that offers individual insurance producers and business entity producers the opportunity to renew their licenses and update their profiles online. In 2008, the Producer Licensing Department participated in the development and design of OLLIE Phase II. OLLIE II sought to provide business entities - also known as insurance agencies - the ability to renew their producer licenses online. The goals of the project were to:

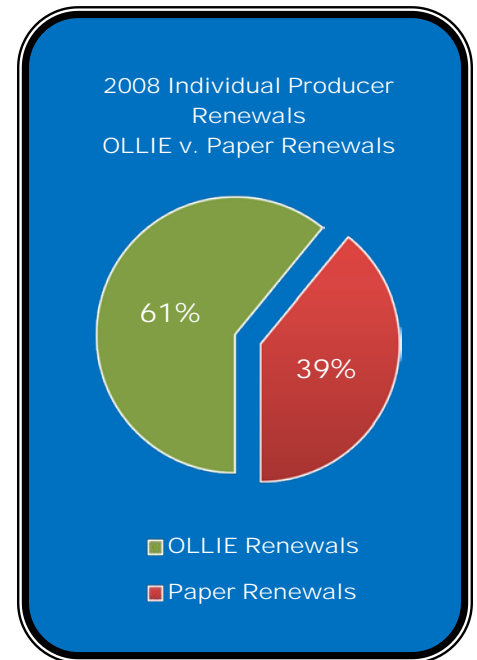
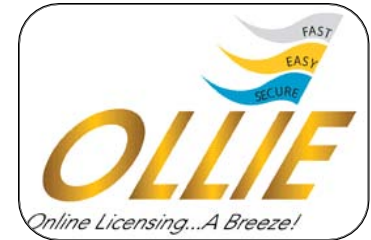
- Enhance the OLLIE website for business entities
- Enhance the internal licensing database – Consolidated Licensing and Regulation Information System (CLARIS)
- Update the AgentFinder website

The development and implementation of OLLIE II was a collaboration between the Producer Licensing Department, Information Technology and the Administration Department. These departments worked together with the consultant contractor and his team. In the technical phase of the OLLIE II project, the Department assisted in determining the functionality of the website. The Department also assisted with writing the business rules, testing the software, and marketing OLLIE II to associations, licensees and consumers.

Department staff provided user acceptance test sessions to the marketing vendor. In addition, the Department invited business entity licensees to be beta testers and to provide comments and feedback on OLLIE II. An exit survey was developed and then completed by the beta testers and the system's first time users who were not beta testers.

The renewal process - formerly completed via paper applications only - is now greatly streamlined, thereby resulting in a reduction in turnaround time. Paper renewal applications are still permitted, and are used by those who do not wish to renew online. OLLIE license renewals can now be processed within 48 hours. The system is accessible 24/7 and frequent email communications from the Division inform producers of their application status.

The Department issues OLLIE PIN letters to all licensees who request such letters. In addition, all renewal letters now mailed to licensed producers include the PIN, which allows the licensees to log on to [www.olliesabreeze.com](http://www.olliesabreeze.com) - either to renew online or to update their user profiles prior to their renewal dates. The Department is responsible for responding to all inquiries that arrive in the OLLIE Help Mailbox. The OLLIE Help Mailbox is assigned to one staff member weekly on a rotating basis.



[www.olliesabreeze.com](http://www.olliesabreeze.com)

### 2008 Licensing Volume

Producers (Individual & Business)	84,518
Motor Vehicle Damage Appraisers	5,290
Surplus Lines Brokers	1,808
Public Insurance Adjusters	231
Insurance Advisors	592
Viatical Settlement or Loan Brokers	36
Reinsurance Intermediaries	124
Auto Clubs	24
Auto Club Agents	661

### AgentFinder

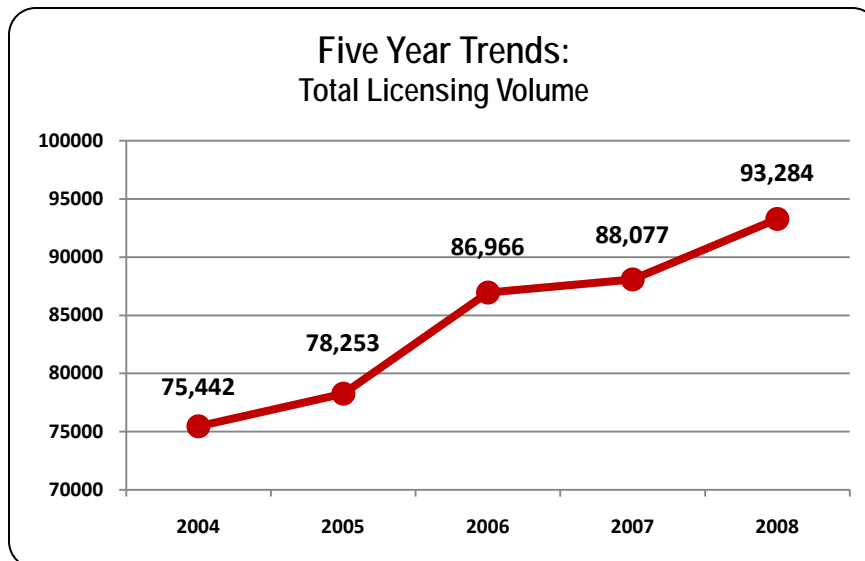
AgentFinder is a web-based tool allowing users to search a database containing all producer profiles. The tool connects consumers to insurance producers based on criteria provided by the consumer. It provides consumers with the ability to locate agents via a detailed search based on geography, products sold, or company affiliations. The Department receives and responds to all inquiries related to AgentFinder. AgentFinder was enhanced in 2008, allowing consumers to view branch office locations of those business entities who updated their user profiles on OLLIE.

OLLIE and AgentFinder are fast, easy and secure systems designed to better serve the needs of consumers and producers alike.

## 7.4 Special Activities

### RFR for Testing Vendor

The Director of Producer Licensing and the Deputy Commissioner of Administration wrote a Request for Response (RFR), for the purpose of obtaining a testing and continuing education vendor. The current vendor's contract expires in April, 2009. The Director of Producer Licensing served as Team Leader of the Procurement Management Team (PMT). Additional members of the team included the Deputy Commissioner of Administration, the Continuing Education Committee Chairperson and two attorneys from the Legal Division. The team developed an evaluation scorecard and a reference checklist. Once bids were received, the team checked references and evaluated the bids. The final selection process will be announced in 2009.



## 8 - State Rating Bureau

### 8.1 Mission

The mission of the State Rating Bureau (SRB) consists of three primary functions:

- Monitoring insurance markets
- Developing technical reports and analyses for the Commissioner on emerging trends in support of the Division's regulatory responsibilities
- Reviewing policy forms, rules and rates filed by or on behalf of insurance companies to ensure that insurance coverage and rating practices are actuarially sound and fair to consumers

The Bureau includes three major subdivisions – the Bureau of Managed Care, the Health Care Access Bureau, and the Policy Form Review Section. The State Rating Bureau participates on behalf of the Commissioner in numerous intra-governmental and public policy groups to evaluate policy options. The Bureau works closely with the Division's legal staff to develop insurance industry bulletins and filing guidance documents to clarify rating and coverage rules and to develop consumer documents that explain features of various insurance products.

### 8.2 2008 Goals

- Take steps to facilitate the implementation of the reformed market for private passenger auto insurance by establishing guidelines that promote the entrance of new companies and a wider diversity of products and rates that improve the availability of choices for Massachusetts consumers.
- Coordinate the Division's efforts to implement health insurance reform as identified in Chapter 58 of the Acts of 2006 and related statutes.
- Regulate insurance policy forms, rates and programs. Take steps to revise regulatory processes - including transition to electronic systems such as the System for Electronic Rate and Form Filing (SERFF) and Electronic Funds Transfer (EFT) - to promote more efficient and effective business practices and communications with consumers. These efforts are intended to reduce the average reviewing time for policy, form and rate filings to 60 days or less.

**Complete**



**Complete**



**Complete**



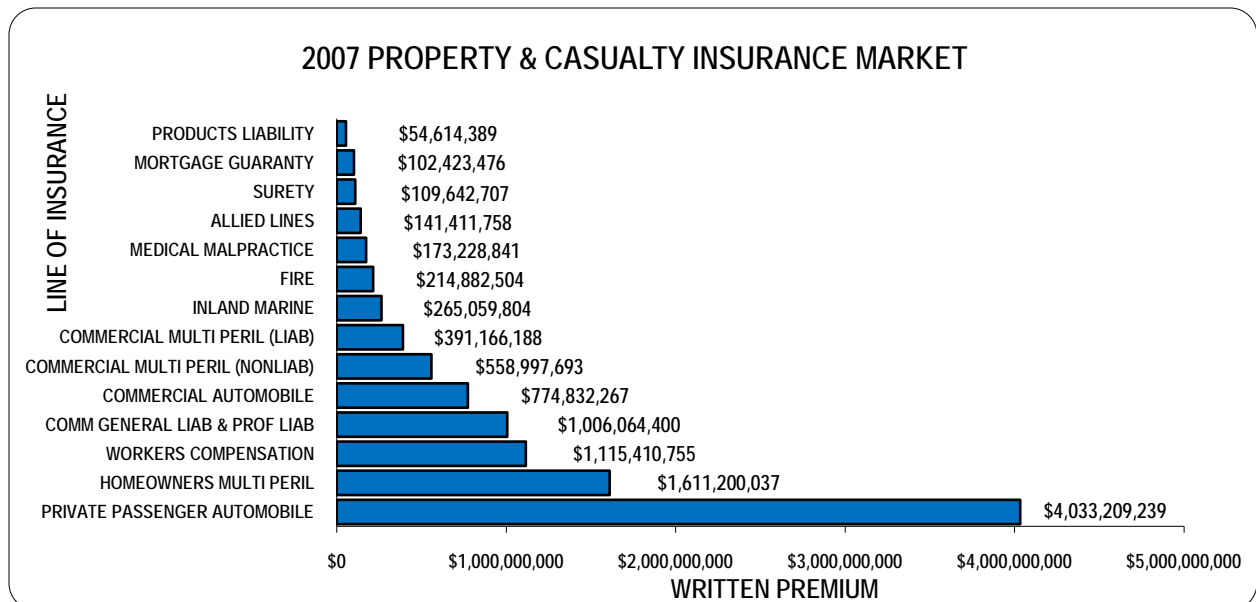
## 8.3 Primary Activities

As the technical advisor to the Commissioner, the work of the State Rating Bureau covers many different areas of the insurance marketplace. In 2008, the State Rate Bureau performed reviews and analyses in the following areas of insurance:

- Private Passenger Automobile
- Workers' Compensation
- Home
- Medical Malpractice
- Credit
- Health
- Policy Form Review

### 8.31 Private Passenger Automobile

Private passenger motor vehicle insurance accounted for over \$4 billion in Massachusetts written premium dollars in calendar year 2007 – this is over twice the level of premiums collected for any other line of property and casualty insurance.



On July 16, 2007, the Commissioner found that market conditions for private passenger automobile insurance supported a move to competitive rating. This change was effective on April 1, 2008, in a market affecting approximately 4 million vehicles. In the 18-month period between July 2007 and December 2008, State Rating Bureau and Legal Division staff worked closely to ensure that companies' new rates and forms were available for consumers to benefit from the new competitive market.

## Managed Competition

After 31 years, the rigid fix-and-establish ratemaking process was replaced with a managed competitive rate process on April 1, 2008. Instead of being required to use standard policy forms and rates, companies were also permitted to submit their own policy forms and rating plans provided that the products satisfied Division policies established by regulations, rules and bulletins. Special one-year transition rules were developed that facilitated the change and allowed Massachusetts residents a wider array of choices already available in most other states.

On the first day of managed competition, 20 company groups offered rates and forms in the newly competitive market. During the remainder of the year, four additional companies (Peerless, AIG Private Client Group, Vermont Mutual and Progressive) received approval to offer products in the market. During this process, State Rating Bureau staff, including those in the Policy Form Review Section, completed reviews in an exceptionally quick fashion so that products could be available by the scheduled date.

## Residual Market Reform

In addition to introducing competitive rating, the Commissioner also changed the residual market for private passenger automobile insurance from a cession-based system to an assigned-risk system beginning on April 1, 2008. In order to minimize disruption in the market, the Commissioner implemented the residual market change in two stages. In the first transition year, companies were able to decline coverage for new drivers and very high risk drivers. Such drivers could then be assigned through the Massachusetts Assigned Insurance Plan (MAIP).

The MAIP is administered by Commonwealth Automobile Reinsurers (CAR) according to rules that are approved by the Division. CAR rules mandate that the service provided to drivers in the MAIP must be comparable to coverage and service provided to drivers in the voluntary market. Drivers assigned through the MAIP pay the lower of the MAIP premium or the company's voluntary premium.

### Auto Insurance Reform

#### SRB Activities

- Advised companies considering entering the Massachusetts market
- Changed or repealed 6 existing auto insurance regulations
- Drafted 18 bulletins and 8 guidance notices related to product design and administrative procedures
- Reviewed proposed amendments for numerous CAR rules
- Created new materials for consumers explaining how to shop for auto insurance
- Designed study to evaluate results of auto reform and evaluate areas of improvement
- Developed online sample premium database for consumers shopping for auto insurance



## Workers' Compensation

State Rating Bureau is responsible for monitoring:

- Market-wide alterations in availability of coverage
- The structure of the statistical plan documenting insurer loss and premium experience
- The health and efficiency of residual market pool
- Industry-wide rates and rating programs for non-discrimination and actuarial appropriateness

### 8.32 Workers' Compensation

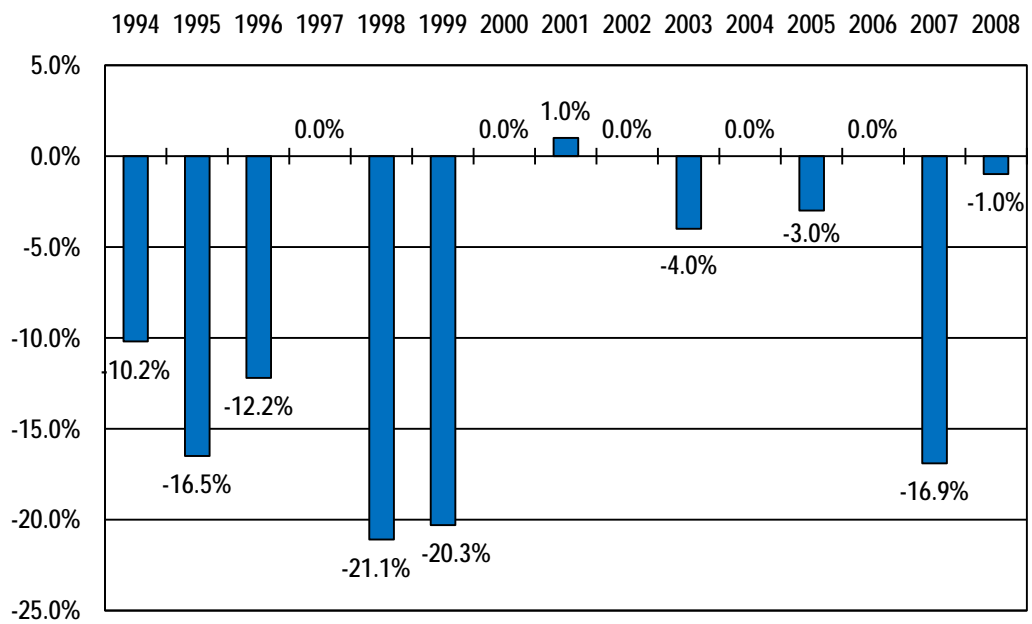
Workers' compensation insurance covers lost wages, medical costs and rehabilitation costs associated with work related accidents or illnesses. With few exceptions, employers are required to purchase workers' compensation coverage for their employees.

SRB staff review all industry bureau and individual company rate, rule, and form filings - including rate deviation filings. The coverage and rates are established according to the processes established under M. G. L. c. 152. Industry filings are coordinated through the Workers' Compensation Rating and Inspection Bureau of Massachusetts (WCRIB) - an entity licensed as a Rating Organization under M. G. L. c. 174A. The WCRIB also acts as the Division's Statistical Agent and Pool Administrator.

#### Rate Review

The Bureau negotiated a final stipulation with the Attorney General's Office and representatives of the WCRIB to reduce average statewide workers' compensation rates by 1% for coverage effective September 1, 2008. The negotiated settlement also included modifications to certain administrative expenses that are paid by employers and premium adjustments for employers that have had losses in the past several years. Both of these changes resulted in even greater rate decreases for small employers in Massachusetts. This stipulation is estimated to save policyholders approximately \$12 million annually, and is the ninth time rates have decreased since 1994.

**Workers' Compensation  
Rate Change History - 1994-2008**





## Statistical Plan and Residual Market Changes

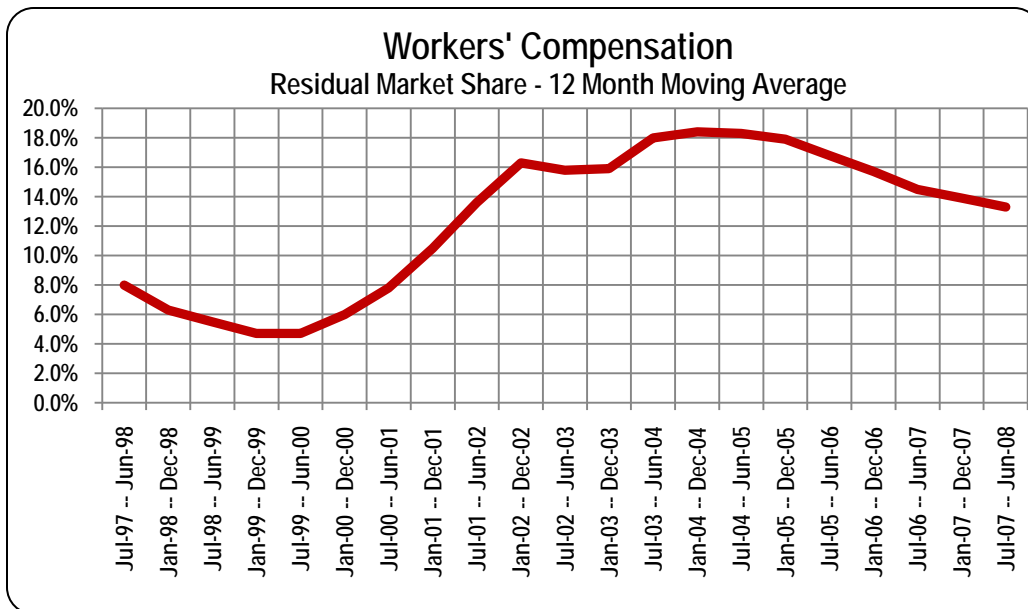
During 2008, the SRB - in coordination with the WCRIB - made revisions to the Massachusetts Statistical Plan that will replace Individual Case Reporting with a simpler national Detailed Claim Information Program. The new Detailed Claim system will provide more and better data regarding medical services and costs. Staff also developed a data remediation plan for the state's largest carrier in order to ensure that the data used to determine appropriate industry-wide rates will be based on accurate loss and premium information.

In continuation of previous efforts to improve the quality of collected data to be used for ratemaking purposes, SRB staff worked closely with WCRIB staff to review audit reports on the quality of submitted data, and advised WCRIB staff on methods that may improve the compliance of certain large carriers. Additional accomplishments included the implementation of new financial incentives to ensure the timely reporting of data and requirements for the cooperation of employers in insurer payroll audits, so that better premium data may be collected.

The SRB also assisted the WCRIB in a transition to a paperless system for residual market pool applications, and in the development of new "premium algorithms" so all companies can calculate premium in the same manner.

## Monitoring the Workers' Compensation Residual Market

Massachusetts has a Workers' Compensation Assigned Risk Pool to provide compulsory coverage for employers that cannot find insurance in the voluntary market. The Division monitors the size of this residual pool.



### 8.33 Home Insurance

Home insurance covers the cost of damage to one's home, as well as personal liability claims that may be filed against the owner of the home. The State Rating Bureau is responsible for:

- Monitoring the market for coverage
- Reviewing the activities of the residual market administered through the Massachusetts Property Insurance and Underwriting Association (FAIR Plan)
- Reviewing all company and FAIR Plan form, rule and rate submissions

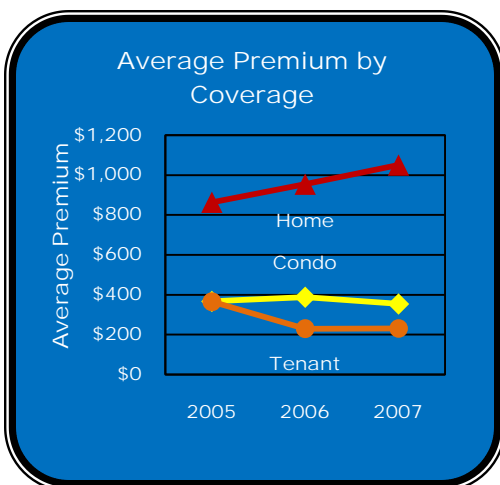
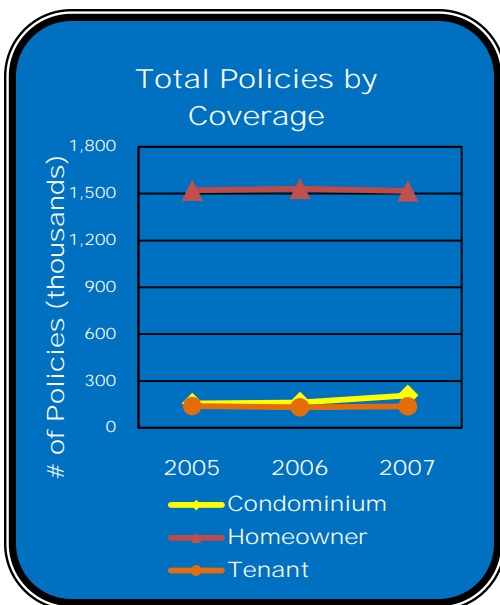
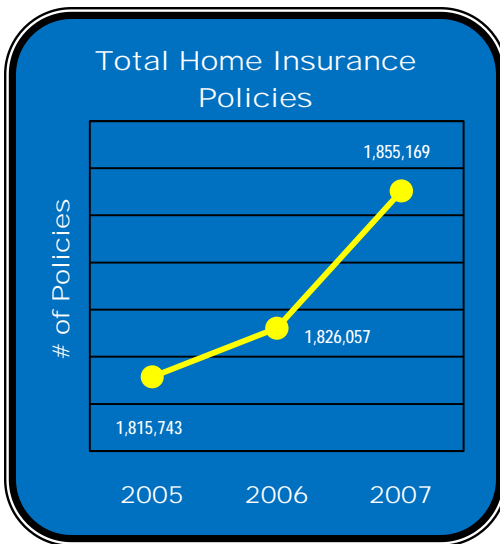
#### Commissioner's Report on Home Insurance

Each year, the Bureau staff completes a report that examines the market for home insurance, the causes of home insurance loss, trends in cancellations/non-renewals, and emerging trends in the availability of coverage - especially in coastal areas. A copy of the report is available in the Publications & Reports section of the Division website – [www.mass.gov/doi](http://www.mass.gov/doi).

Among the findings of the annual report is that the number of Massachusetts home insurance policies written between 2005 and 2007 increased by approximately 39,000 policies.

Among the three major types of coverage - condominium, homeowners and tenant - the biggest relative change occurred in the market for condominium coverage, with 46,000 additional condominium policies written in 2007 compared to 2005. While homeowner's policies represent the lion's share of home insurance policies, condominium policies represent the area of growth in the marketplace.

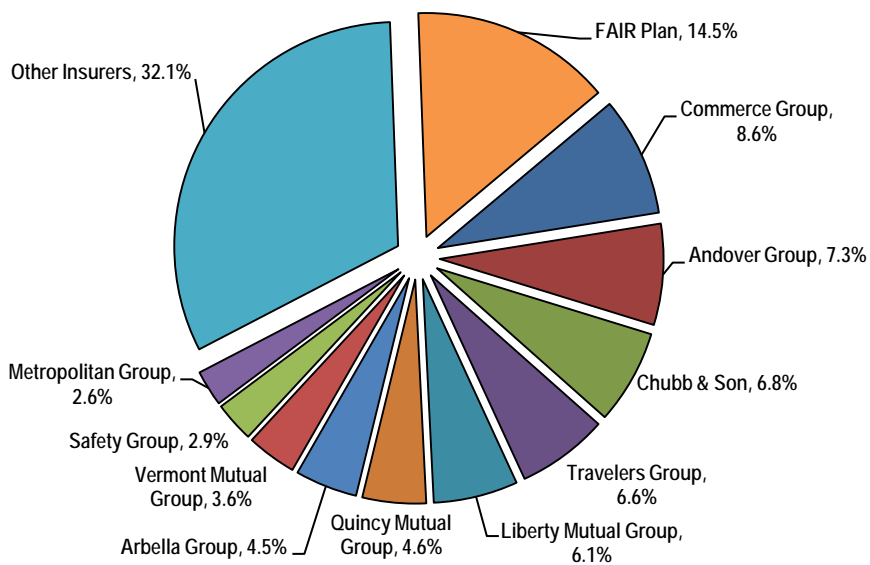
Between 2005 and 2007, the average premiums for condominium and tenant policies decreased, but the average premium for homeowners insurance policies increased from \$864 per policy to \$1,050 per policy.



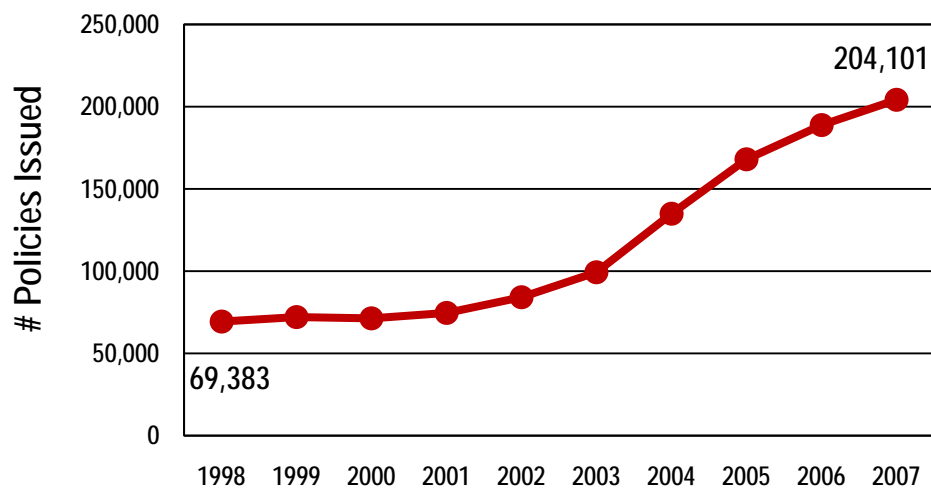
## Availability of Coverage

In Massachusetts, the FAIR Plan provides coverage for home insurance when a homeowner cannot locate coverage in the open market. Beginning in 2003, the number of policies covered under the FAIR Plan increased dramatically as licensed companies began non-renewing their coastal exposures in the Cape, Islands and southern Bristol and Plymouth Counties. By the end of 2007, the FAIR Plan had grown to over 204,000 policies, and covered 14.5% of all coverage written in Massachusetts in 2007.

### 2007 Home Insurance Market Share



### FAIR Plan Policies: 1998 - 2007



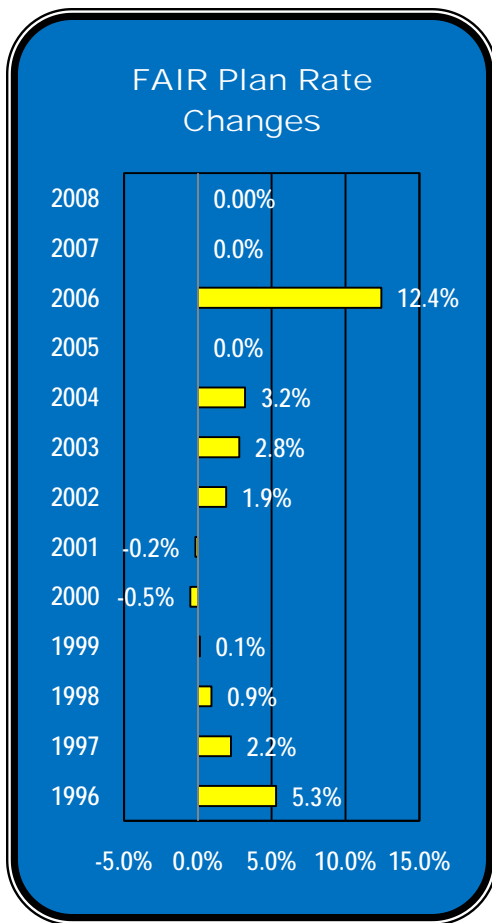
### FAIR Plan Rate Hearing

The FAIR Plan submitted a rate filing on March 21, 2007, requesting new rates that would have increased statewide homeowner's multi-peril average rates by 13.2%, and rates in the Cape and Islands area by as much as 25%. State Rating Bureau staff actively participated in the rate hearing held between April 2007 and February 2008 to consider the actuarial merits of the filed rates. In addition to scrutinizing FAIR Plan filing materials and cross-examining FAIR Plan and Attorney General witnesses, SRB staff submitted advisory filings and briefs to argue the position of the Bureau.

The Commissioner decided on May 8, 2008 that the FAIR Plan failed to meet its burden of proof in the proceeding and the rate filings were disapproved. The chart on the left chronicles the FAIR Plan rate changes from 1996 through the 2008 decision.

### Danvers Special Examination

Beginning April 11, 2007, the State Rating Bureau coordinated a special examination to review the processing of claims related to a November 22, 2006, Danvers chemical plant explosion. The blast from the explosion and the resulting fire accounted for insurance company claims filed on damages affecting over 500 homes, businesses, boats and motor vehicles either in the immediate vicinity or locale of the blast. The Division completed its exam in March 2008, and found that of the 531 claims filed, only six remained unresolved within 12 months of the explosion. Companies paid a total of \$14,346,778 for damage to homes and associated personal property, businesses, motor vehicles, and boats damaged by the explosion.



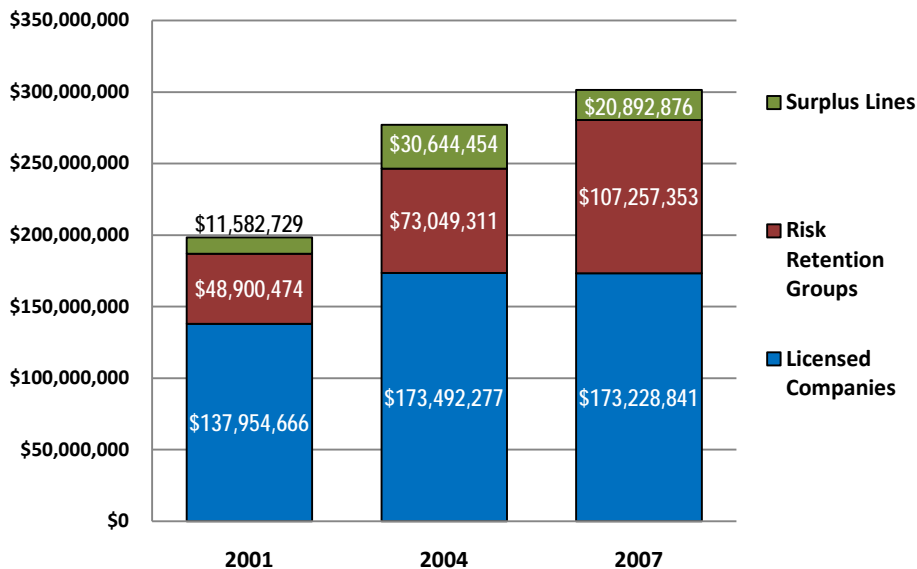
### 8.34 Medical Malpractice Insurance

Medical malpractice insurance covers medical malpractice claims and the expenses associated with defending alleged medical malpractice. The State Rating Bureau is responsible for:

- Monitoring the market for coverage
- Analyze and collect data
- Reviewing the activities of the residual market pool
- Reviewing all company-filed form, rule and rate filings

In 2008, the State Rating Bureau completed a report that examined the costs of medical malpractice coverage for health care practitioners. Based upon information presented at hearings held in Boston and Worcester and additional research, the SRB presented the cost and availability of coverage and examined options for changing the market. A copy of the report is available in the Publications & Reports section of the Division website – [www.mass.gov/doi](http://www.mass.gov/doi).

**Medical Malpractice Total Market**



#### Annual Medical Malpractice Report

##### 2008 Findings

- Cost of coverage of OB/GYN may be a factor leading to reduced number of these doctors in MA
- Premium dollars written increased from \$198M in 2001 to \$301M in 2007
- Proportion of coverage written in regulated market dropped from 69.5% in 2001 to 57.5% in 2007
- Proportion of coverage written in unregulated surplus lines and risk retention markets grew from 30.5% in 2001 to 42.5% in 2007

#### New Legislation

On December 30, 2008, Chapter 444 of the Acts of 2008 amended the medical malpractice statutes to require that medical malpractice coverage offered to physical therapists and physical therapist assistants be available on a “take-all-comers” basis beginning March 30, 2009.

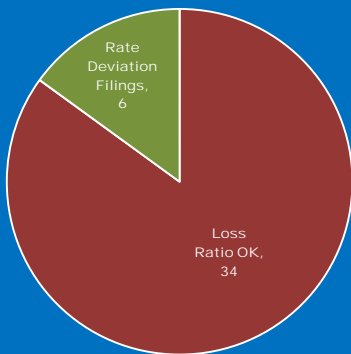
### 8.35 Credit Insurance

Credit insurance is offered with many non-mortgage loans and credit card applications. Depending on the coverage, these products will pay all or some portion of outstanding loan balances in the event of the death, disability or involuntary unemployment of the covered person. Insurance companies offering these policies must issue special disclosures that make the covered persons aware that they are not required to purchase the coverage to obtain the loan or credit. Insurers must also comply with special statutory loss ratio requirements.

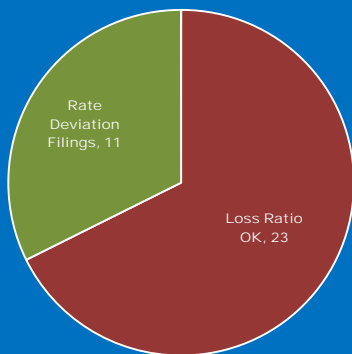
Starting this year, the SRB developed an annual report based upon information submitted by the individual carriers. In general, the level of coverage issued in Massachusetts has continued to drop as other non-insurance debt relief products (*e.g.*, debt cancellation products) are available from banking institutions. Between 2005 and 2007, total reported incurred credit insurance premium for Massachusetts fell from \$40 to \$35 million.

In the course of reviewing annual submissions, the Bureau examined the filings to determine whether companies continued to satisfy the statutorily required minimums of a 50% loss ratio for credit life, 55% loss ratio for credit accident and sickness, and 60% loss ratio for credit involuntary unemployment insurance. Based upon this review, the SRB contacted companies whose rates fell below those statutory minimums to revise their premiums. The charts on the left illustrate the number of rate deviations filings received during 2008 - highlighting the instances when a company changed their rates because their loss ratios fell below the statutory minimum.

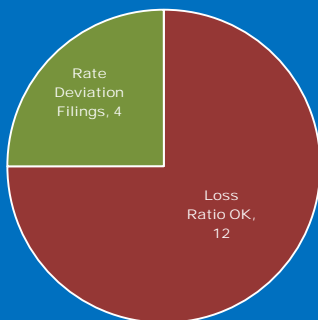
**Credit Life**  
(40 filings)



**Credit Disability**  
(34 filings)



**Credit Involuntary Unemployment**  
(16 filings)



## 8.36 Health Insurance

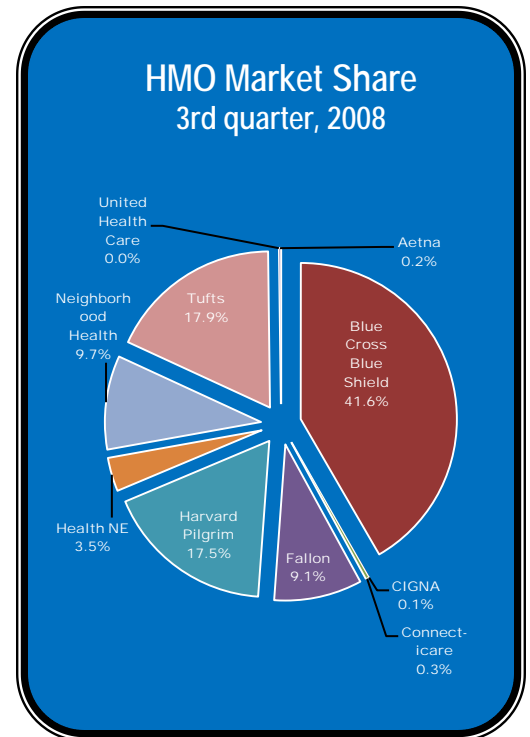
### Bureau of Managed Care

The Bureau of Managed Care (BMC) reviews health insurance company materials to determine whether their operations satisfy managed care protections required under Massachusetts General Laws chapter 176O. These protections include those related to:

- Consumer disclosures
- Evidences of coverage
- Provider contracts
- Network directories
- Utilization reviews
- Quality assurance and credentialing
- Internal appeals systems

In addition, the Bureau of Managed Care advises the Commissioner on emerging issues associated with health reform, company operations and administrative practices, managed care practices, and mandated health benefits.

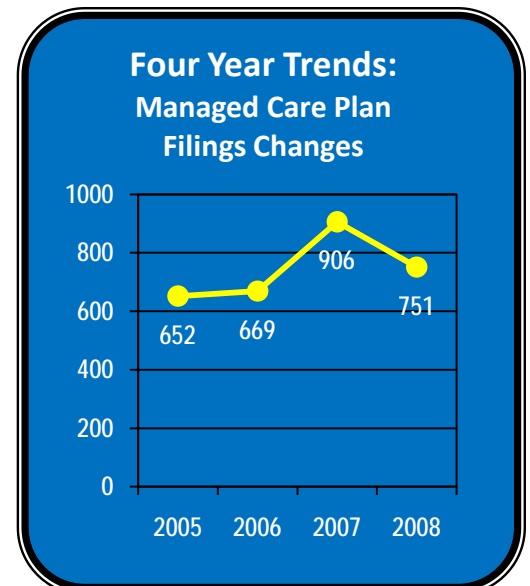
Health Maintenance Organizations (HMO) provide the vast majority of all insured health plan coverage in Massachusetts. More than 2 million people receive health care coverage through an HMO plan from one of 10 companies. Relative market share during the 3<sup>rd</sup> quarter of 2008 is shown by the chart to the right.



### Managed Care Accreditation Reviews

The BMC is responsible for conducting a comprehensive review of all insured health plans with managed care systems every two years in order to determine compliance with the requirements of M. G. L. c. 176O. Companies that are not accredited are not permitted to offer managed care plans in Massachusetts. During 2008, the BMC completed the review of 37 existing health insurance companies and completed the initial accreditation review of two companies: Delos Insurance Company and Boston Medical Center Health Plan, Inc.

In addition to annual accreditation reviews, the BMC completed the review of 751 material change filings to already completed accreditation filings. Most of the materials submitted were changes to existing health insurance evidences of coverage. During 2008, the BMC implemented the SERFF system being used by the Policy Form Review section to facilitate the review of BMC filings. All filings submitted after December 31, 2008 are required to be filed via SERFF.



## Health Reform

During 2008, the BMC coordinated many of the Division's efforts to implement health reforms created under Chapter 58 of the Acts of 2006, as well as Chapters 257, 305 and 321 of the Acts of 2008. The BMC worked closely with other state agencies - including the Commonwealth Health Insurance Connector Authority (Connector), Department of Public Health, Department of Mental Health, and the Executive Office of Health and Human Services - to revise regulations and develop bulletins and guidelines to assist consumers and insurance carriers in complying with the new policies.

In 2008, the Division issued bulletins that provide guidance on:

- Expanded coverage for family dependents, in some cases up to age 26
- Disclosure of whether a plan satisfies the Connector's Minimum Creditable Coverage standards

The BMC also convened the first meeting of the Advisory Committee on Uniform Billing and Coding in December, 2008. Representatives from local providers and payers make up this committee that is charged with providing recommendations to the BMC for the adoption of policies and procedures on uniform billing and coding of health claims. The advisory committee will hold additional meetings in 2009 to continue the development of the recommendations.

As required under Chapter 58, the BMC coordinated the administrative steps necessary to complete the phase-out of the existing Small Group and Non-Group Health Reinsurance Plans. In December, 2008, the Governing Committee held its last meeting to close down plan operations, distributed the remaining surplus to those companies who participated in each plan and took steps to audit the final plan distributions.



## Health Care Access Bureau

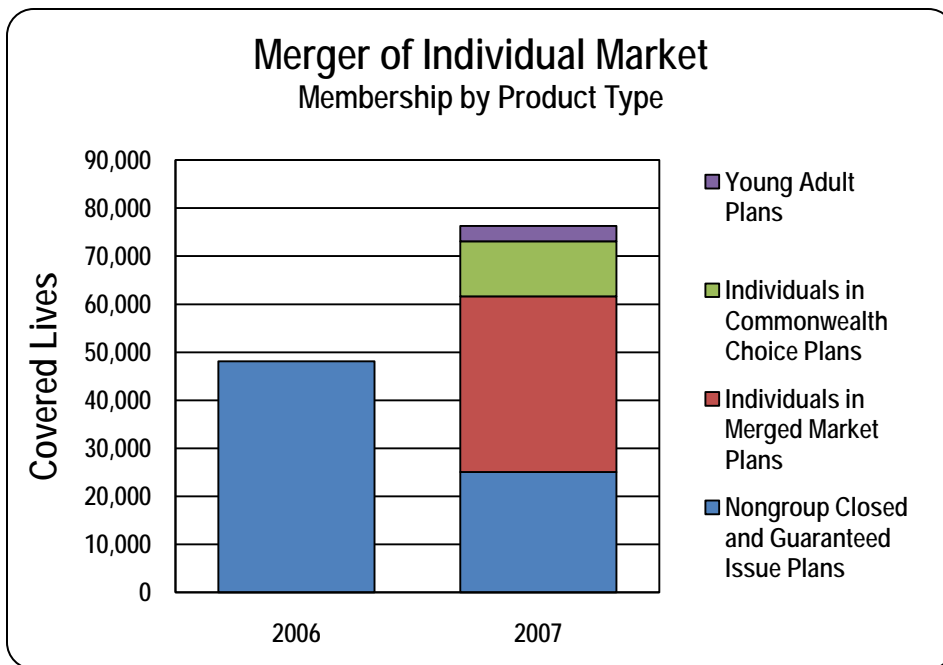
The Health Care Access Bureau (HCAB) is responsible for monitoring the market for health insurance coverage - concentrating on the availability and affordability of coverage. Members of HCAB represent the Commissioner on a number of health insurance committees and task forces, including:

- Health Care Quality and Cost Council
- HealthyMass Compact
- Interagency Analytic Work Group
- Long-Term Care Financing Advisory Committee

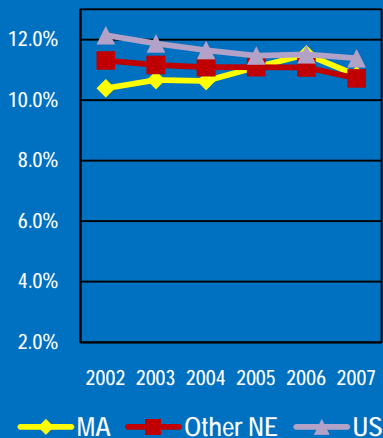
During 2008, the HCAB worked actively with the Bureau of Managed Care and with other state agencies, including the Executive Office of Health and Human Services, the Connector, and the Division of Health Care Finance and Policy, to implement reforms created under Chapter 58 of the Acts of 2006 and Chapter 305 of the Acts of 2008 and examine ways to address health cost and quality.

### Access: Merger of Small Group/Individual Markets

Two essential components of Health Care Reform were the the July 1, 2007 merger of the small group and individual markets and the development of Young Adult Plans to provide additional coverage options for individuals in Massachusetts. The HCAB examined the number of people covered in individual plans before and after the merger and found that coverage in individual health plans increased by 28,220 from 2006 to 2007.



### HMO Administrative Expense Ratios



### Affordability: Actuarial Reports

From time to time, the Bureau will identify important issues or questions that require a level of analysis beyond the capabilities or resources of existing staff. On these occasions, the Division will contract with outside actuarial consultants with appropriate expertise to conduct high-level analyses under the direction the HCAB, and issue a report on behalf of the Division.

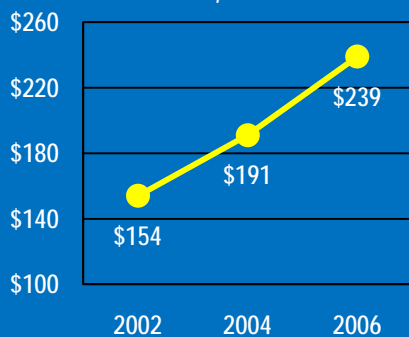
The HCAB staff contracted with actuarial consultant Oliver Wyman to study the cost factors driving increases in the cost of health care and health insurance. In one study, Oliver Wyman looked at trends in Massachusetts' HMOs' paid health care claims. As illustrated in the report, the claims cost per member per month for medical services increased by 55%, from \$154 in 2002 to \$239 in 2006.

Oliver Wyman conducted a second study to examine Massachusetts HMOs' administrative expenses compared to those of HMOs in other states. As illustrated in the report, the administrative expense ratio for Massachusetts health carriers is similar to that of HMOs in other Northeast states and nationwide.

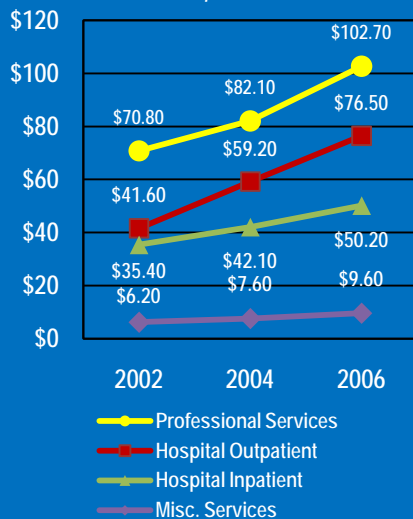
Mercer Consulting conducted a third study to examine the features of health plans bought by large employers in Massachusetts. As illustrated in the report, the consultants found that Massachusetts survey respondents are dropping closed network HMO plan options, but have been slower to drop HMOs than respondents from the Northeast and the US as a whole. Approximately 77% of Massachusetts respondents offered HMOs in 2007, compared to 86% in 2001, the year HMO offerings peaked.

Copies of both Oliver Wyman reports and the Mercer report are available in the Publications & Reports section of the Division website – [www.mass.gov/doi](http://www.mass.gov/doi).

### Claims Costs Per Member, Per Month



### Claims Costs Per Member, Per Month



## Health Care Quality and Cost Council

Staff from the HCAB represented the Commissioner on the Health Care Quality and Cost Council created under Chapter 58. Council members are responsible for creating and maintaining a website that presents the cost of receiving certain procedures by health care provider, and for examining ways to improve quality and address increases in overall health care costs.

Council activities focused primarily on the collection of claims data from all licensed health insurance plans, analyzing the submitted data and developing a website that illustrates the relative quality and cost of receiving a procedure, supply or service from one health care provider as opposed to another. The website – <http://hcqcc.hcf.state.ma.us> - was created and launched on December 10, 2008.



HCAB members actively participated on the Council's Communications and Transparency, Cost Containment, and Data Release Review Board Committees. Each committee is examining ways to improve communications with consumers, developing cost containment strategies and new data collection guidelines.

## Long-Term Care Insurance

Long-term care insurance covers the cost of community and facility-based care services provided to those who are unable to perform certain Activities of Daily Living due to chronic illness. Companies offering individual coverage in Massachusetts are required to offer certain benefits and make detailed disclosure of the coverage features.

During 2008, the federal Government Accountability Office (GAO) issued a report entitled "Long-Term Care Insurance: Oversight of Rate Setting and Claims Settlement Practices" that pointed out differences in rate review standards and claim paying practices from one state to another. Following a review of the summary information included in the report, the Division initiated market studies to examine the following:

- The number of Massachusetts residents who buy long-term care, the product benefits that they buy and the relative costs of coverage
- The rate review standards used by other state insurance regulators when examining company requests to increase rates on existing long-term care insurance products
- The claims paying practices of long-term care insurance companies operating in Massachusetts.

Results of these studies will be released in 2009.

### 8.37 Policy Form Review

The Policy Form Review Section is responsible for reviewing property & casualty, life & annuity, and accident & sickness filings made by insurance companies to ensure they are consistent with Massachusetts law. The focus of these reviews is on consumer protection, adequate reserving for claims, and justification of rates.

#### Process Changes

Working closely with the insurance industry, the Policy Form Review staff took numerous steps in 2008 to streamline filing requirements in order to:

- Eliminate unnecessary administrative materials
- Collect consistent types of materials necessary to review filings
- Improve efficiency and consistency in reviewing policy forms, rules and rate filings

In addition to holding Policy Forums with industry trade groups, the Division issued two bulletins making specific changes to the review process.

In May of 2008, the Division issued Bulletin 2008-08 to eliminate many previously issued administrative filing requirements and clarify filing procedures. The goal of this change was to streamline the process so that the Policy Form Review staff could approve, disapprove, place on file or reject filings within 60 days of their filing date. The Division also indicated in the Bulletin that it would accept filings from property & casualty, life & annuity and health companies beginning with January 1, 2009 only if the filings were sent in electronically via the SERFF (System for Electronic Rate and Form Filing) system. The Bulletin discussed taking the steps necessary to implement the Electronic Funds Transfer (EFT) capability so that companies would no longer need to make administratively burdensome filings to the Division's bank lockbox system. All the noted changes were implemented prior to December 31, 2008, and all filings are now being received and reviewed electronically.

In December of 2008, the Division issued Bulletin 2008-19 to clarify the method that insurance companies use to calculate fees for filings submitted to the State Rating Bureau. Prior to the bulletin, varying fee filing rules applied to property & casualty, life & annuity and health insurance filings. The bulletin clarified that all companies, including fraternal benefit societies, Health Maintenance Organizations, Blue Cross and Blue Shield of Massachusetts, Delta Dental of Massachusetts and Massachusetts Vision Service Plan, would need to submit \$75 for each company using the policy forms in a filing and \$150 for each company using the rates or rules in a filing. The resulting change streamlines the time necessary to recover the appropriate fees for a filing so that it can then be reviewed by Policy Form Review staff.

#### Policy Form Review

##### 2008 Process Changes:

- Elimination of unnecessary filing requirements
- Implementation of uniform fee calculations
- Conversion to electronic documents
- Improvement of internal tracking

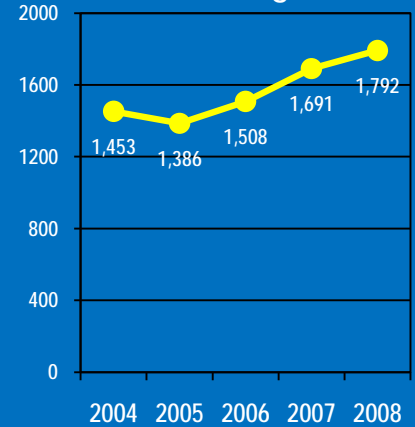
Throughout 2008, in anticipation of Bulletin 2008-08, the Policy Form Review staff devoted substantial time and resources to convert previously submitted property & casualty and individual accident & sickness paper filings to electronic documents. This conversion took place according to a process approved by the Secretary of State's Records Conservation Board. By creating these electronic files and uploading them to the SERFF system, the filing materials are then immediately available to examiners and the general public. Pending future approvals from the Secretary of State, the Policy Form Review section will discard paper documents that have been electronically stored, thereby reducing the Division's overall storage needs.

Finally, the Policy Form Review section implemented new reporting systems by the end of 2008 that will enable staff to keep track of the number of forms, rules or rates processed within reasonable timelines. This new reporting system was necessary since companies may submit many forms, rules or rates within the same filing. This annual report includes statistics for both filings, as well as form, rule or rate materials for comparison with prior years. This data helps the section prepare for future filings.

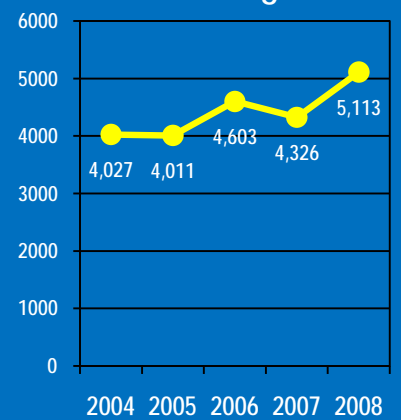
The noted steps have improved the overall efficiency of policy review by facilitating staff's retrieval of files and communication with company filing staff. These changes have resulted in time service goals being achieved in 83% of our received filings. As we continue to refine our processes and utilize available technologies, we anticipate continued improvements in this area.

The Policy Form Review section implemented procedures in 2007 and 2008 to monitor the time that staff takes to review policy form, rule and rate filings. Due to steps taken to reduce unnecessary procedures and improve electronic filings, 92.75% of all 2008 forms and rates were reviewed and closed in less than 60 days.

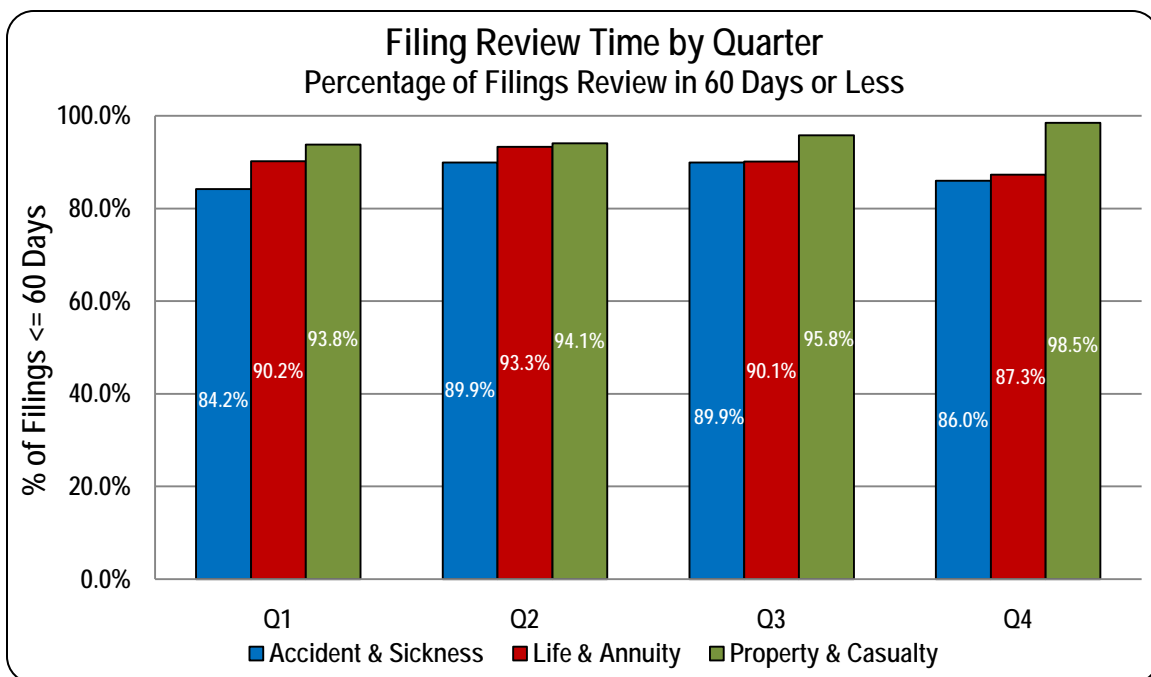
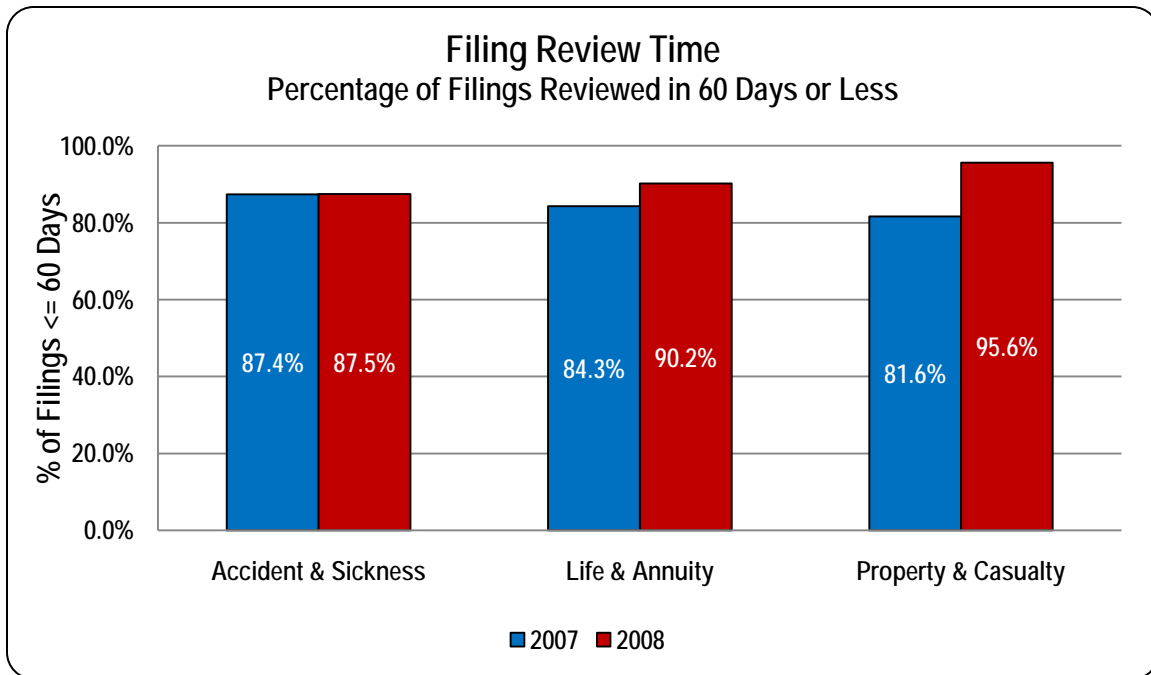
**Five Year Trends:  
Rate Filings**



**Five Year Trends:  
Form Filings**



The following illustrates the proportion of filings reviewed in the target time period of 60 days or less during 2008.









## 9 - Consumer Service

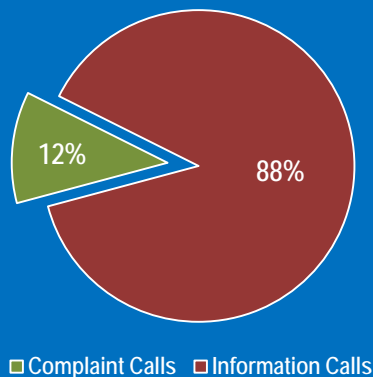
### 9.1 Mission

The Consumer Services Section (CSS) responds to inquiries and assists consumers in resolving complaints against insurers, producers and other licensees. In addition to providing consumers with general insurance information in the form of brochures and guides, the Section also advises consumers on their options and rights under their policies, state laws and insurance regulations.

### 9.2 2008 Goals

- Hire and train new staff to replace four examiners that left the Division in 2007. Workloads and all outstanding cases left by exiting employees to be reassigned to the remaining examiners. Close outstanding cases from departed examiners. **Complete** 
- Create an Administrative Guide to complement the already completed Administrative Flowchart to assist all existing temporary or permanent assistants with on-the job training and resources. **Complete** 
- Continue on-going training for existing and newly hired CSS staff on insurance topics in areas of property & casualty insurance, underwriting, and claims handling available through the Insurance Library in order to better assist the public. **Complete** 
- Maintain and schedule monthly training sessions for CSS staff offered by the State Rating Bureau to cover topics in areas of health care reform and the current status of the competitive auto market affecting consumers. **Complete** 
- Enhance monthly CSS productivity reports submitted to Senior Staff by highlighting key factors of call and case trends. **Complete** 
- Increase the number of case referrals to Special Investigations Unit (SIU) and enhance examiner's knowledge by implementing internal training from SIU in order to comply with the department's mission of tracking and reporting market conduct issues. **Complete** 

## Hotline Calls



## 9.3 Primary Activities

### Consumer Calls

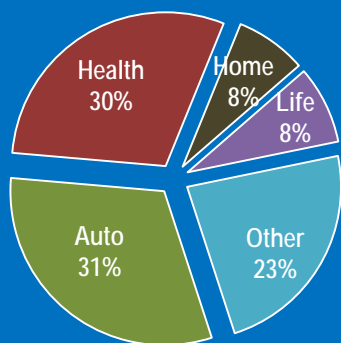
Insurance consumers receive personal assistance from the Division's Consumer Services staff by calling the Consumer hotline Monday through Friday 8:45 to 5:00. All hotline calls are logged into a call database. This database allows the Division to gather a range of sortable data on each call. CSS runs a variety of reports based on this data in order to show trends in consumer hotline calls.

Examiners answer questions regarding most lines of insurance and offer information about companies and producers, such as the status of licenses and complaint data. Consumer Services staff refer callers to the materials on the InsureMass section of the Division's website in order to provide deeper background on the question or complaint.

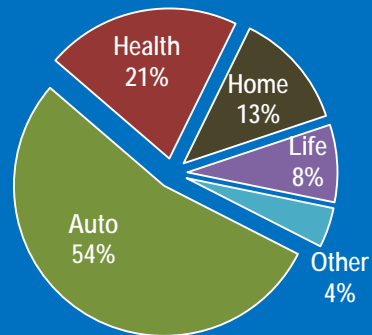
In addition to informational requests, approximately one in ten calls to the hotline is a consumer complaint. Examiners are often able to resolve such complaints over the phone with a simple verbal explanation of the relevant insurance law or contract provision. In other cases, Consumer Services staff recommend that the caller file a formal complaint to the Division.

In the fall of 2008, the Section's call volume increased significantly due to questions from policyholders of the AIG Insurance Company. When news stories broke about the possible failure of the AIG parent company, consumers across the nation feared for reliability of policies purchased from AIG insurance subsidiaries. In the first week alone, the consumer hotline received nearly 150 calls on this topic. AIG policyholders wanted to know whether the company was solvent, and what protections existed if the crisis resulted in an insurer insolvency. CSS examiners were able to explain the basic elements of the Massachusetts Life and Health Guarantee Fund and referred callers to the Fund for more detailed responses.

## Informational Calls by Line



## Complaint Calls by Line



### 2008 Consumer Informational Calls Top 5 Reasons by Line of Insurance

Automobile Insurance	Health Insurance
Claim Settlement Timeframe	Continuation of Coverage
Premium Rates	Mandatory Benefits
Cancellations	Mini-COBRA
Safe Driver Insurance Plan (SDIP)	Co-payments
SR-22s	Claim Settlement Timeframe
Home Insurance	Life Insurance
Cancellation	License Status
Claim Settlement Timeframe	Claim Settlement Timeframe
Non-renewal	Interest
Coinsurance	Cancellation
Determine ACV	# of Complaints Against Company



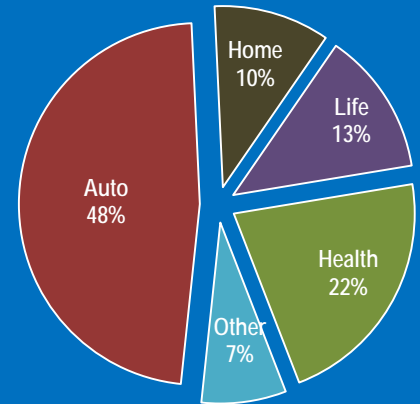
## Consumer Complaints

Any consumer of an insurance product marketed or sold in Massachusetts may file a consumer complaint with the Consumer Services Section against an insurer or insurance producer. Written complaints are entered into our database and then forwarded to the company or producer for response. Licensees must respond to the Division within 14 days with a complete reply addressing all issues raised in the consumer complaint. Section examiners review the complaint and licensee reply, and advocate for the rights of consumers where appropriate. Closed complaints are coded in the complaint database

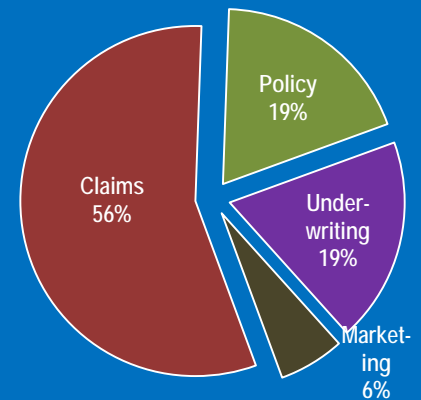
The complaint database provides for both proper case management and the reporting of complaint data. In order to protect the insurance public and accomplish the Division's mission of forecasting trends regarding the insurance industry, the section generates monthly reports from the complaint database. These reports allow the Division to look for patterns of unfair or deceptive practices by producers, insurance companies, or other licensees. When appropriate, the information may be referred either to the Special Investigations Unit or Market Conduct Section for further action. "Slow pay" patterns and other questionable industry trends are brought to the attention to the Division's Financial Surveillance staff, as these may be early indicators of liquidity or solvency problems.

Over the last several years, the Division has invested significant time and resources in the training and development of the Consumer Services staff. Along with training in key content areas, the Section also conducted a series of internal strategic planning sessions aimed at maximizing the quality of complaint reviews. For the second consecutive year, the section secured a substantial increase in recoveries for consumers. In 2008, CSS staff resolved over 1500 written complaints and recovered more than \$1.4 million for consumers.

2008 Consumer Complaints  
by Line of Insurance



2008 Consumer Complaints  
by Categories



### 2008 Consumer Complaints: Top 10 Reasons

Denial of Claim	22.0%
Claim Delay	14.6%
Unsatisfactory Offer	9.1%
Cancellation	7.2%
Premium Refund	4.2%
Premium & Rating	2.9%
Premium Notice & Billing	2.5%
Information Requested	2.3%
Comparative Negligence	2.2%
Agent Handling	2.2%

### Consumer Complaints: Dispositions

Dollar Recoveries	350
Referral to Proper Agency	155
Delay Resolved	137
Refer to Discipline	70
Claim Resolved	30
Policy Restored	21
Cancellation Withdrawn	6
Coverage Extended	5

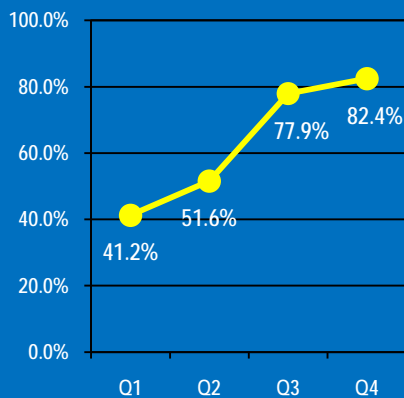
### Complaint Dispositions

The vast majority of complaints with positive outcomes result in dollar recoveries for consumers. While they are very important, these recoveries are only one of several possible favorable resolutions for a consumer complaint. In many cases, consumers complain to the Division because their insurance company is unresponsive or slow in settling a claim. Such cases typically involve a delay resolution in addition to a recovery. In other cases, the Section assists consumer working to restore policies, rescind cancellations or waive fees.

### Complaint Response Time

The top priority of the Consumer Service Section is to find the correct answer to consumer questions and complaints. The Division places more importance on accuracy than on speed. Nonetheless, the Section recognizes that timeliness is an essential element in the proper handling of a consumer complaint.

### % of Complaints Closed in 90 Days or Less



In many cases, consumers have already experienced a substantial delay in the resolution of their dispute with the insurer before a complaint is filed with the Division. Claim denials and policy cancellations leave consumers in a financial limbo – they cannot move forward or back without a definitive answer on an unresolved insurance dispute. The staff of the Consumer Service Section has the goal of resolving each consumer complaint in 90 days or less.

For most of 2008, Consumer Services operated at a level between 65% and 85% operational capacity due to the departure of several experienced examiners in late 2007 and several staff absences in early 2008. Despite these structural limitations, Section staff doubled the percentage of cases handled in less than 90 days over the course of the year.

## Complaint Ratios

Among the thousands of questions posed by consumers calling the Division's hotline concerns the reputation of particular insurance companies. Consumers shopping for coverage often look for some objective measure of customer service on the part of specific companies. Each year, the Division posts updated complaint ratios for major insurers in the private passenger automobile and homeowner's insurance markets. The ratios are calculated by comparing the share of complaints filed against a company to that company's market share. This figure is then normalized to a ratio per \$10 million in premium written in order to control for different levels of market share.

In 2008, the Consumer Services Section handled nearly 600 automobile insurance complaints. Twenty-two auto insurers wrote at least \$10 million in premium in Massachusetts during 2008.

2008 Private Passenger Automobile Insurance Complaints and Market Share			
Company	Premium Share in 2008	Complaints Filed in 2008	Complaints per \$10,000,000 in Premium
Commerce Group	31.00%	169	1.47
Safety Group	11.05%	68	1.65
Arbella Insurance Group	9.25%	35	1.02
Liberty Mutual Group	8.37%	48	1.53
Metropolitan Group	6.53%	51	2.10
Travelers Group	6.28%	50	2.14
Plymouth Rock Assurance Corporation	5.88%	30	1.37
Hanover Insurance Group Allmerica Financial	3.84%	28	1.96
Amica Mutual Group	3.62%	21	1.56
White Mountains Group	2.49%	16	1.71
United Services Automobile Association Group	2.12%	5	0.63
Allstate Insurance Group	2.11%	12	1.53
Quincy Mutual Group	1.67%	6	0.97
Main Street American Group	1.26%	4	0.86
Progressive Group	1.24%	19	4.12
Norfolk & Dedham Group	1.12%	6	1.44
Allianz Insurance Group	0.48%	7	3.91
Pilgrim Insurance Company	0.48%	8	4.49
State Farm Group	0.42%	1	0.64
Electric Insurance Group	0.40%	4	2.69
Remainder of Market (13 Groups)	0.39%	11	7.67

The number of consumer complaints regarding homeowner's insurance is significantly smaller than the number of automobile insurance complaints. In order to ensure that comparisons between companies are valid, the Division groups together homeowner's complaints from a five year period: 2004 -2008. Unlike the automobile insurance market, the homeowner's insurance contains a large number of carriers with comparatively small market shares. In calculating complaint ratios, the Division looks at the top 25 company groups and the Massachusetts Property Underwriting Association (FAIR Plan).

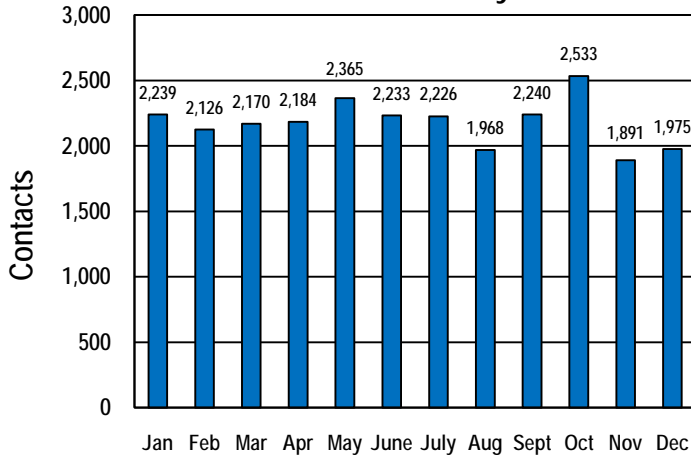
2004 - 2008 Homeowner's Insurance Complaints and Market Share			
Top 25 Company Groups & Fair Plan	Premium Share 2004-2008	Complaints Filed 2004-2008	Complaints per \$10,000,000 in Premium
MA Property Underwriting Association (FAIR Plan)	12.73%	146	1.36
Commerce Inc. Group	8.71%	80	1.08
Andover Group	7.35%	42	0.68
Travelers Group	6.86%	53	0.91
Chubb & Son Inc. Group	6.73%	4	0.07
Liberty Mutual Group	5.88%	37	0.74
Quincy Mutual Group	4.96%	37	0.88
Arbella Insurance Group	4.50%	39	1.02
Vermont Mutual Group	3.33%	22	0.78
The Hanover Insurance Group	2.88%	11	0.45
Safety Group	3.02%	24	0.94
Metropolitan Group	2.29%	19	0.98
Amica Mutual Group	2.63%	9	0.40
Norfolk & Dedham Group	2.59%	12	0.55
White Mountains Group	2.35%	16	0.81
United Services Automobile Association	2.24%	3	0.16
Plymouth Rock Insurance Group	1.90%	12	0.75
Hingham Mutual Group	1.68%	20	1.41
Preferred Mutual Insurance Company	1.64%	26	1.87
Allianz Insurance Group	1.39%	3	0.26
Barnstable Group	1.43%	2	0.17
Main Street America Group	1.24%	5	0.48
Providence Group	1.09%	10	1.08
Union Mutual Fire Insurance Group	0.95%	4	0.50
Harleysville Group	0.95%	8	1.00
New London County Group	0.95%	6	0.74

## 9.4 Special Activities

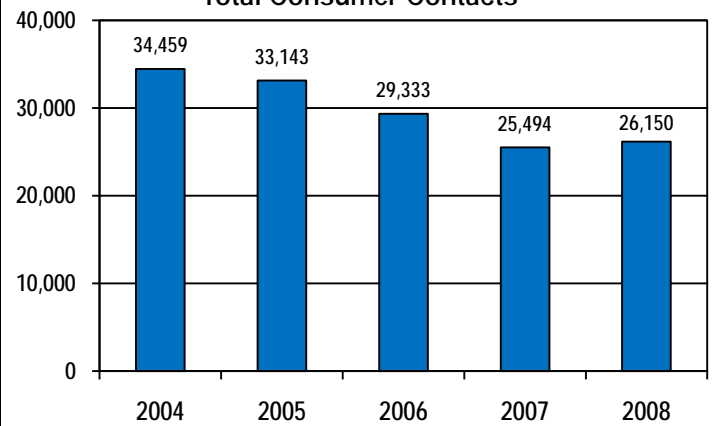
Section staff participated in two successful consumer outreach events in 2008. In February, 2008, the Division set up a consumer day in the lobby of South Station. This event accompanied the transition to managed competition in automobile insurance. Governor Patrick addressed a crowd of spectators while CSS staff assisted the public in navigating the Division's two new web-based tools for auto insurance shopping: AgentFinder and the Sample Premium Comparison site. The second event was a similar demonstration at the Roxbury Film Festival held during the first week of August. Section staff assisted consumers by demonstrating our online services and providing general insurance information and brochures about auto, health and life insurance.

## 9.5 Consumer Services Section Statistics

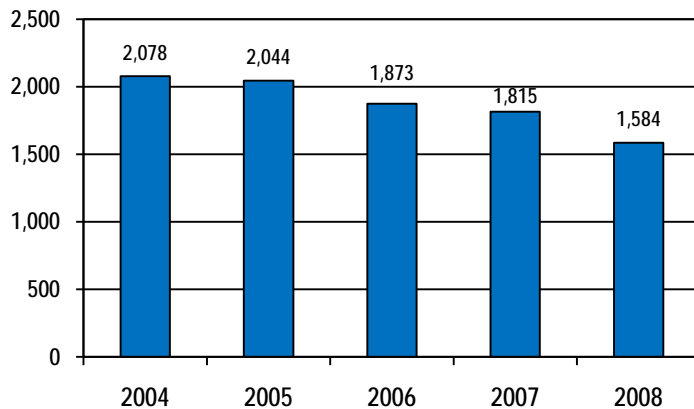
**2008 Consumer Contacts by Month**



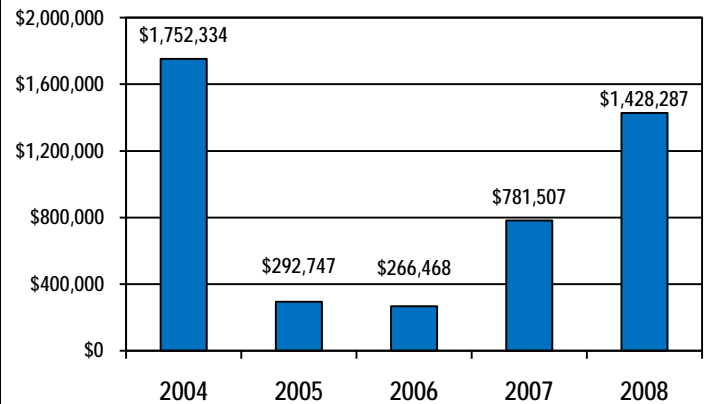
**Five Year Trends:  
Total Consumer Contacts**



**Five Year Trends:  
Consumer Cases**



**Five Year Trends:  
Dollar Recoveries for Consumers**



## 9.5 Online Consumer Publications

As part of their mission to provide insurance consumers with accurate and useful informational materials, the Division creates, updates and publishes a range of insurance materials in print and online. These materials must find a way to explain relatively complex insurance topics in a manner easily understood by the average consumer. Every publication created and maintained by the Division is also posted on our website. Below is a list of consumer publications and web pages available as of December 31, 2008.

### Automobile Insurance

- It Pays To Shop Around (Consumer FAQ)
- Massachusetts Consumer Bill of Rights for Auto Insurance
- Massachusetts Auto Insurance Plan (MAIP) Consumer Guide
- Ways to Save on Your Auto Insurance 2008
- FAQ on Auto Insurance
- Automobile Group Marketing Plans (Group Discounts)
- Safe Driver Insurance Plan (SDIP) - How SDIP Works, Appealing Surcharges, & Hearing Locations
- How to Appeal Your Driver's License Revocation
- How to Appeal an Auto Insurance Cancellation
- List of Companies Writing Automobile Insurance in Massachusetts
- Automobile Insurance Consumer Complaint
- Motor Vehicle Insurance Installment Plans

### Homeowner's Insurance

- Commissioners Report on Homeowner's Insurance
- National Flood Insurance Program
- FAQ on Homeowner's Insurance
- Homeowner Group Marketing Plans 2009 (Group Discounts)
- Homeowners Warranty Contracts
- MAHA Homesafe Program & Discounts
- Homeowner Insurance Service Areas
- Companies Writing Home Insurance in Massachusetts
- Consumer Alert: Renter to Owner
- A Massachusetts Guide to Insurance for Your Home and Ways to Help Reduce Your Insurance Premiums
- A Massachusetts Guide to Understanding the Insurance Policy Covering Your Home  
FAQ on Flooding and Insurance

### Health Insurance

- Health Care Reform Tips and Resources
- Consumer Guide to Health Care Coverage
- Consumer Guide to Individual and Small Groups
- Employer FAQ on Non-discrimination and Equal Contribution Requirements
- Long Term Care Guide
- Mandatory Benefits Guide
- Medigap/HMO Guide Effective
- MiniCobra Continuation of Coverage Benefits Guide
- Consumer Alert: Be Aware of Unlicensed Health Plans
- Consumer Alert: Premium Assistance for Employees of Small Employers

### Life Insurance

- Buying Life Insurance and Annuities in Massachusetts
- Consumer Alert: Annuities and Senior Citizens

### Workers Compensation Insurance

- Workers Compensation FAQ for Employees
- Workers Compensation FAQ for Employers

### Miscellaneous Insurance Guides

- Renter's Insurance
- Credit Insurance
- Boat Insurance
- Recreational Vehicle Insurance
- Travel Insurance
- Pet Insurance
- Wedding Insurance
- Winter Weather Insurance
- Identity Theft
- Insurance Fraud
- Disaster Information

# 10 - Board of Appeal

## 10.1 Mission

The mission of the Board of Appeal is to conduct hearings for consumers appealing:

- The assessment of a surcharge for an at-fault accident
- A decision of the Registry of Motor Vehicles regarding a license suspension, revocation or denial
- An insurance cancellation issued to a consumer by their insurance company

## 10.2 2008 Goals

- Reduce backlog of pending appeals. A waiting period of no more than 6 months is considered an acceptable length of time between surcharge and hearing date.

**Ongoing**

## 10.3 Primary Activities

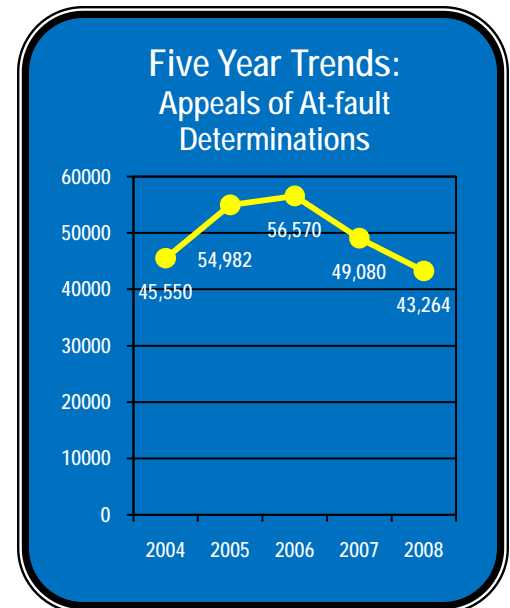
### Hearings on At-fault Accident Determinations

Each automobile insurance carrier administers a unique system of adjusting premiums based on an operator's driving record. Typically, these merit rating plans decrease premiums for years of incident-free driving, and increase premiums for operators with at-fault accidents or traffic citations. These premium adjustments create a financial incentive that encourages safer driving.

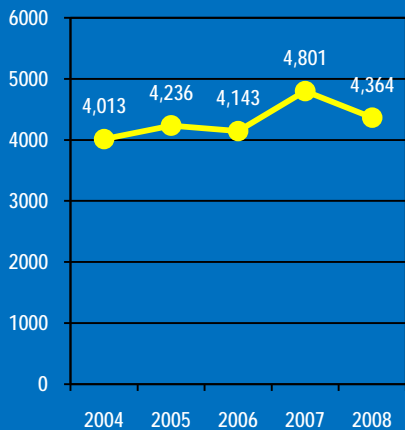
A driver who feels he is not at fault for an accident may elect to have a hearing in order to contest the fault determination by his insurance carrier. These hearings only look at whether a driver is more than 50% at fault for the accident and deserves the financial penalty. This process ensures that each company's merit rating plan is being run fairly and equitably.

At the hearing, the appellant has the right to present relevant facts and circumstances by oral testimony or documentary evidence, as well present witnesses question any testimony. The appellant may elect not to appear at a hearing and submit a statement along with any relevant documents to the Board for an administrative review.

If the Board finds that the insurer's determination of fault was not in accordance with the Standards of Fault promulgated by the Commissioner, the determination is overturned. The driver's record will then be changed to reflect this finding. If the Board finds that the insurer's application of a surcharge was in accordance with the Standards of Fault, the determination is upheld.



### Five Year Trends: Appeals of RMV Actions



### Registry of Motor Vehicle Action Appeal Hearings

The Board has jurisdiction to hear appeals from any decision or ruling of the Registrar of Motor Vehicles. Board members review testimony, documentation and laws applicable to the appeal and make a decision in the dispute.

If the decision allows a licensing privilege to be reinstated partially or fully, the appellant must take the decision to the Registry of Motor Vehicles to complete the required administrative procedures to become reinstated. A favorable decision is not a license - it allows the appellant to go the Registry to become reinstated.

The Board of Appeal does not review license suspensions arising from a chemical test refusal or statutory revocations pursuant to a court order.

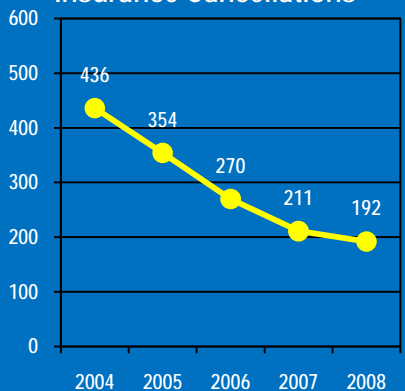
### Automobile Insurance Cancellation Appeal Hearings

The Board also hears complaints arising from automobile insurance cancellations. The complaint must be filed before the cancellation date. If it is, the policy remains in effect until the Board has issued its decision. If an appeal is filed after the cancellation date, but within 10 days of cancellation, the appeal is heard, but the cancellation will still take effect.

A complaint may not be filed:

- If a policy has been secured from another insurance company
- For non-payment of premium on a registered taxicab or fleet of taxicabs
- On a cancellation of a policy effected by a finance company
- If a company refuses to issue a policy

### Five Year Trends: Appeals of Auto Insurance Cancellations










# 11 - Legal Division

## 11.1 Mission

The Legal Division - including the Special Investigations Unit - assists the Commissioner of Insurance in administering the laws of the Commonwealth as they pertain to the protection of the insurance consumer through the regulation of the insurance industry. The Legal Division further assists the Commissioner of Insurance in monitoring the solvency of insurance companies by coordinating the rehabilitation of financially troubled insurers, and the takeover and liquidation of insolvent insurers.

## 11.2 2008 Goals

- |  |          |   |
|--|----------|---|
| <ul style="list-style-type: none"> <li>• Provide legal support and advice to the Commissioner of Insurance, Division staff, consumers, executive and legislative branch members and other interested parties in the Massachusetts insurance marketplace.</li> </ul>  | Complete |    |
| <ul style="list-style-type: none"> <li>• Review and analyze proposed or enacted legislation affecting insurance companies and the insurance buying public.</li> </ul>  | Complete |    |
| <ul style="list-style-type: none"> <li>• Research and draft regulations, regulatory bulletins and interpretative letters on Massachusetts insurance laws and regulations.</li> </ul>   | Complete |  |
| <ul style="list-style-type: none"> <li>• Serve as hearing officers in various regulatory proceedings, including hearings concerning new or amended regulations or financial transactions. Examples include proposed mergers, acquisitions or redomestications of Massachusetts domestic insurance companies.</li> </ul>  | Complete |  |
| <ul style="list-style-type: none"> <li>• Provide a flexible alternative to litigation through the adjudicatory hearing process conducted by the Hearings and Appeals Section. The process includes insurance rate proceedings, enforcement actions against Division licensees and administrative appeals, including appeals from decisions of the residual market entities overseen by the Commissioner of Insurance.</li> </ul> | Complete |  |

## 11.3 Primary Activities

### Auto Reform: Repealed Regulations

- 211 C.M.R. 86.00 - Reductions in Premium Charges for Private Passenger Motor Vehicles and Certain Commercial Motor Vehicles Equipped With An Anti-Theft Mechanism
- 211 C.M.R. 93.00 - Cost and Expense Containment for Motor Vehicle Insurers
- 211 C.M.R. 124.00 - Reductions in Premium Charges for Private Passenger Motor Vehicles and Certain Commercial Motor Vehicles Equipped With Certain Safety Features

### Auto Reform: Regulatory Bulletins

- 2008-05 - The distribution of consumer information guides and additional policy information materials
- 2008-06 - The availability of rate filings for public inspection
- 2008-07 - Requirements for policies with six month terms
- 2008-08 - Guidelines for submission of form, rate and rule filing materials
- 2008-09 - Regulatory review standards applicable to the residual market rate filing
- 2008-11 - Regulatory review standards applicable to voluntary market rate filings
- 2008-13 - Designation of "high-theft vehicles" and prescribed anti-theft or auto recovery devices
- 2008-18 - Policy placement requirements

### Reform of Private Passenger Motor Vehicle Insurance Market

As part of the continuing transition to a competitive private passenger motor vehicle insurance market, the Legal Division reviewed a variety of regulations related to the operation of that market. This review resulted in the repeal of certain regulations that the Commissioner of Insurance determined were now outdated.

The Commissioner of Insurance also issued a variety of regulatory bulletins to provide further guidance to the industry during the transition, particularly for policies issued on or after April 1, 2009.

### Reform of the Private Passenger Motor Vehicle Insurance Residual Market\Implementation of the Massachusetts Automobile Insurance Plan (MAIP)

The Commissioner of Insurance devoted substantial resources in 2008 to implementing a reform of the residual market for private passenger motor vehicle insurance to an assigned risk plan - known as the Massachusetts Automobile Insurance Plan (MAIP). The Commissioner determined that concurrent implementation of the MAIP in the private passenger motor vehicle insurance residual market and the introduction of competitive rating for private passenger motor vehicle insurance required Commonwealth Automobile Reinsurers (CAR) - the administrator of the motor vehicle insurance residual market - to change some of its rules of operation. Consequently, she promulgated emergency amendments to MAIP Rules 21 through 24, and Rules 26 through 38 in February. A Decision and Order was issued on May 6, 2008. The Commissioner of Insurance issued other Decisions and Orders relative to certain CAR and MAIP Rules in 2008 for which public hearings were held in 2007:

- Order on Proposed Amendments to Rules of Operation 23, 26, 28 and 30 (Order issued January 2, 2008)
- Order on Proposed Amendments to Rules of Operation 11 and 12 and Rules 29 and 31 of the Massachusetts Automobile Insurance Plan (Order issued January 16, 2008)

## Implementation of Health Care Reform

Legal Division attorneys devoted significant time to assisting the Division's Bureau of Managed Care and Health Care Access Bureau with the ongoing implementation of health care reform. These activities included reviewing and analyzing new or amended health care legislation, drafting new or amended regulations to conform with or implement health care laws, and drafting interpretive bulletins to provide guidance to the insurance industry on the implementation of various new and amended health care laws and regulations. Attorneys assisted the Bureau of Managed Care in implementing certain requirements under health care reform, including the dissolution of the Reinsurance Board and the implementation of the Advisory Council on Billing and Coding. Attorneys also assisted both the Bureau of Managed Care and the Health Care Access Bureau in representing the Commissioner of Insurance at various meetings related to health care reform - including meetings of the Health Care Quality and Cost Council, and meetings with the Division of Health Care Finance and Policy on Insurer Assessments, meetings with Healthy Mass on administrative simplification, and meetings with various consumer advocacy groups and insurance carriers on all aspects of health care reform.

## Hearings and Appeals

In 2008, the Division held public hearings on rate filings concerning statewide workers' compensation rates and statewide homeowner's insurance rates for the residual market (MPIUA or FAIR Plan). Hearings were also held on two insurers' filings relative to Medicare supplement insurance rates. The Division held public hearings relative to the competitive private passenger motor vehicle insurance rate filings of five insurance companies. Five of these hearings were instituted in response to requests made to the Commissioner of Insurance by the Office of the Attorney General, while one was initiated directly by the Commissioner. In each of the hearings requested by the Attorney General, the Commissioner of Insurance ultimately issued a Decision and Order not disapproving the insurer's competitive rate filing. The Division additionally held public hearings concerning the overall condition of the Massachusetts market for Medicare Supplement insurance, the costs of medical malpractice insurance for health care providers, and the fees paid by a dental service corporation to its participating dentists.

Division attorneys assisted in the review of two applications for the proposed acquisition of a Massachusetts domestic insurer, the proposed redomestication of a Massachusetts domiciled insurer to another state, and the proposed merger of a Massachusetts domestic insurer with a foreign insurer. The Division held hearings on each of these proposed transactions. Division enforcement counsel instituted 19 administrative actions against Division licensees and defended three appeals of Division license denials.

### Hearings and Appeals: New & Amended Regulations

- Amendments to 211 C.M.R. 20.00, Risk Based Capital (RBC) for Insurers
- New 211 C.M.R. 26.00, Annual Financial Reporting for Years Ending 2010 and After
- Amendments to 211 C.M.R. 52.00, Managed Care Consumer Protection and Accreditation of Carriers
- Repeal of 211 C.M.R. 86.00, Reductions in Premium Charges for Private Passenger Motor Vehicles and Certain Commercial Motor Vehicles Equipped with an Anti-Theft Mechanism
- Repeal of 211 C.M.R. 93.00, Cost and Expense Containment for Motor Vehicle Insurers
- Repeal of 211 C.M.R. 124.00, Reductions in Premium Charges for Private Passenger Motor Vehicles and certain Commercial Motor Vehicles Equipped with Certain Safety Features
- Amendments to 211 C.M.R. 134.00, Safe Driver Insurance Plan
- Amendments to 212 C.M.R. 2.04, Procedures for the Conduct of Appraisals and Intensified Appraisals

**Active Domestic Receiverships:****In Liquidation**

- Abington Mutual Liquidating Trust (06/09/1995)
- American Mutual Liability Insurance Company (01/17/1989)
- New England Fidelity Insurance Company (09/20/2000)
- Trust Insurance & Trust Assurance Companies (02/10/2000)
- Newburyport Mutual Fire Insurance Company (07/26/2006)

**In Rehabilitation**

- Attleboro Mutual Liquidating Trust (08/26/1992)
- Lumber Mutual Insurance Companies (11/01/2000)
- Monarch Life Insurance Company (06/09/1994)

**Closed Domestic Receiverships:**

- Groveland Mutual Insurance Company 11/29/2004 Closed in 2008

**Receiverships**

If a Massachusetts domestic insurance company's financial condition becomes impaired, the Commissioner of Insurance is empowered to seek judicial appointment as receiver of the impaired company. As receiver, the Commissioner acts as a fiduciary on behalf of the insurer's policyholders and creditors and seeks to provide that the insurer's obligations to its policyholders are met to the fullest extent possible. Although a receivership is designed to benefit all creditors of the impaired insurer, the protection of the insurer's policyholders is the utmost concern of the receiver.

Receiverships may involve plans to rehabilitate, run-off or liquidate the insurance company. If the Commissioner determines that an insurer lacks sufficient assets to meet all of its obligations to policyholders in the ordinary course of business, then such insolvent insurer will be liquidated. As a liquidator, the Commissioner marshalls the insolvent insurer's assets, liquidates those assets, adjudicates claims and makes distributions to approved creditors of the company.

If a foreign insurance company doing business in Massachusetts becomes financially impaired, the Commissioner may seek judicial appointment as ancillary receiver for the purpose of conserving the impaired foreign insurance company's assets in the Commonwealth for the benefit of such insurer's Massachusetts policyholders and creditors.

**Active Ancillary Receiverships:**

- Legion Insurance Company (PA)  
Estimated Assets: \$24,473,931
- Villanova Insurance Company (PA)  
Estimated Assets: \$0.00
- Reliance Insurance Company (PA)  
Estimated Assets: \$38,390,058
- Home Insurance Company (NH)  
Estimated Assets: \$2,162,333
- United Capitol Insurance Company (IL)  
Estimated Assets: \$300,000

## **Litigation**

During 2008, Legal Division attorneys worked extensively on several actions in state court. Arbella Mutual Insurance Company and the Massachusetts Association of Insurance Agents filed a Complaint for Declaratory Relief and Appeal from the Decision and Order of the Commissioner with the Superior Court on June 5, 2008. The companies are appealing a decision of the Commissioner dated May 6, 2008, to implement certain rules in the Massachusetts automobile insurance residual market (MAIP). Their general claims are that the Commissioner of Insurance exceeded her statutory authority by promulgating several rules related to the transition to managed competition in the private passenger automobile insurance market. The Division disputes these claims and asserts that the Commissioner acted within the scope of her authority in all respects. Currently, this matter is awaiting assignment to a judge in Superior Court.

## **Other Activities**

The Legal Division responded to a total of approximately 75 written public records requests in 2008. In addition, attorneys handled an average of three to four oral public record requests per week over the course of the year. The Office supervised and assisted in responding to a substantial number of public records inquiries through other Division departments, including Consumer Services, Financial Surveillance, Policy Forms Review, Producer Licensing, and Special Investigations. Public records inquiries increased in 2008.

Staff attorneys continue to serve as appointees by the Commissioner of Insurance to an advisory committee that reviews all applications for written consent to engage or participate in the business of insurance under the provisions of the federal Violent Crime Control and Law Enforcement Act of 1994, 18 U.S.C. § 1033 (1033 Committee) and makes recommendations to the Commissioner on such applications. In 2008, the 1033 Committee received two applications for written consent to engage or participate in the business of insurance as unlicensed employees, as opposed to insurance licensees. Both applications for written consent were denied by the Commissioner of Insurance.

## 11.4 Special Investigations & Enforcement

### Mission

The Special Investigations Unit (SIU) investigates allegations of misconduct by Division licensees, and pursues enforcement actions where appropriate. These cases include finding and reviewing evidence supporting allegations of unfair methods of competition, unfair or deceptive acts or practices in the business of insurance, and other violations of insurance laws and regulations.

### 2008 Goals

 **Complete**

- Thoroughly investigate cases referred by the general public, other state and federal investigative and prosecutorial agencies, as well as other sections of the Division involving allegations of unfair methods of competition, unfair or deceptive acts or practices in the business or insurance, and other violations of insurance laws and regulations.

 **Complete**

- Pursue enforcement actions, which may include negotiated settlements, consent agreements or administrative decisions - including cease-and-desist orders, compliance programs, license suspension or revocation, and the imposition of financial penalties.

 **Complete**

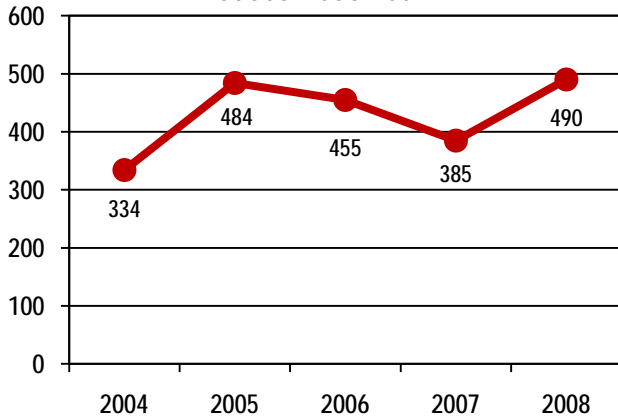
- Make referrals to federal and state government agencies, as well other regulatory bodies, and report evidence of criminal activity to the appropriate law enforcement authorities.

### Primary Activities

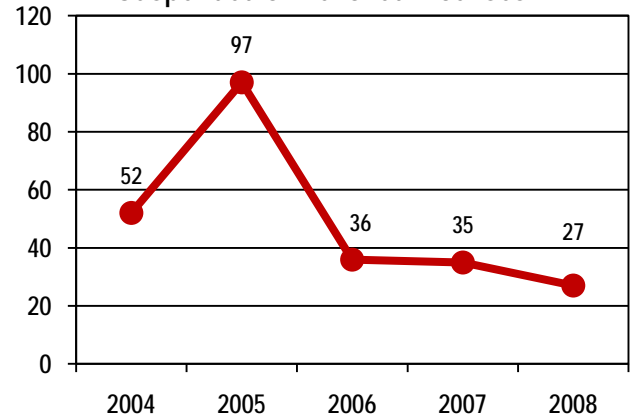
For calendar year 2008, Special Investigations and Enforcement closed 490 cases resulting in the suspension or revocation of 27 individual insurance licenses, and the assessment of \$226,735 in financial penalties and \$5,639 in restitution. These cases involved a variety of alleged violations of insurance laws and regulations, including: licensees failing to make appropriate disclosures on insurance license applications; licensees failing to timely disclose administrative or criminal matters to the Division; licensees engaging in forgery or theft of insurance premium; insurers issuing policies without the proper license authority; insurers using unapproved policy forms or issuing policies at unapproved rates; and, insurers failing to timely renew insurance producer appointments.

During 2008, the Special Investigations Unit reported enforcement actions online to the NAIC's Regulatory Information Retrieval System. Enforcement actions also are posted on the Division's website. In addition, the SIU staff participated in the Online Fraud Reporting System, the State Regulatory Information Retrieval System Alert Notification System, and the Special Activities Database System sponsored by the NAIC.

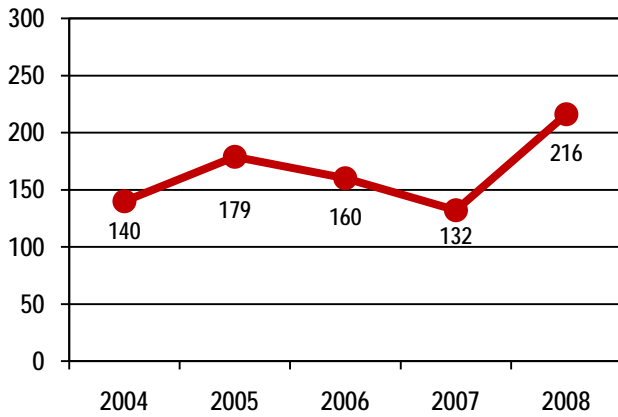
**Five Year Trends:**  
Cases Resolved



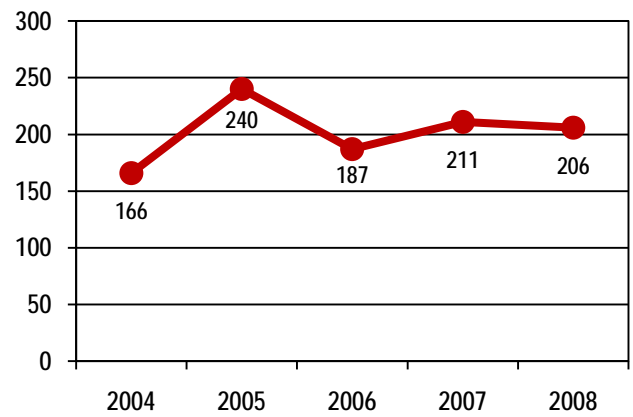
**Five Year Trends:**  
Suspended or Revoked Licenses



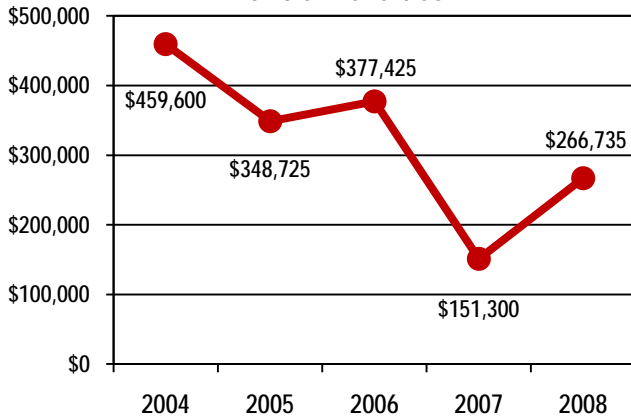
**Five Year Trends:**  
Cease & Desist Orders



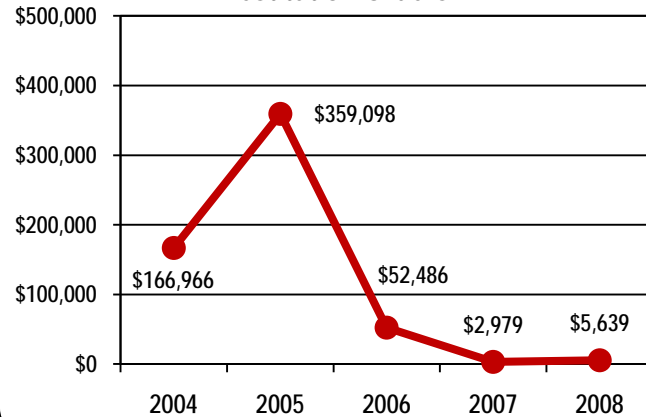
**Five Year Trends:**  
Enforcement Referrals



**Five Year Trends:**  
Financial Penalties



**Five Year Trends:**  
Restitution Orders





## 12 - Information Technology

### IT Operational Responsibilities:

- Desktop and LAN services
- Helpdesk services
- Website information architecture
- Application services
- Telecommunications system and services
- Data connections to MAGNet, the Commonwealth's Wide Area Network, and to Galaxy Internet Services, as well as private data circuits to the NAIC

The Information Technology Group provides technical service and support to all departments of the Division of Insurance. The Group ensures that IT initiatives have clear business goals and success metrics that align with, and fully support the Division's strategic mission and goals. The Group also ensures the protection of IT assets and the integrity, security and privacy of information entrusted to or maintained by the Division. The Information Technology Group develops and manages the implementation of custom applications in support of the Division's various departments. These application programs are deployed to improve business processes, maximize efficiencies and improve service levels while achieving increased productivity.

### 12.1 Mission

- Support the mission, goals and objectives of the Division of Insurance, and provide efficient and useful services and technology to the Division's internal user community, as well as to external constituents
- Provide effective, reliable and responsive hardware, software, networking infrastructure, support services and development personnel
- Provide quality services to our user community
- Strive for excellence and customer satisfaction in our networking, helpdesk, systems development and consulting endeavors. Perform our duties with a proactive approach and adopting a "can do" attitude
- Constantly improve on the Division's investment in technology by: safeguarding technology assets; expanding technical knowledge and skills; working cooperatively with business partners and users; and, leveraging available State and NAIC technologies for the good of the Division

### 12.2 2008 Goals

 **Complete**

 **Complete**




 **Complete**

 **Complete**

 **Complete**

- Install data encryption on all Division laptop computers.
- Perform security vulnerability testing of the Division's external network.
- Design, build and launch InsureMass and AgentFinder interactive information portal.
- Implement an interactive consumer web portal for automobile insurance rate comparisons.
- Complete a thorough physical inventory of all IT equipment and assure reconciliation with book inventory in compliance with audit recommendation in 2007.



- |  |   |
|--|---|
| • Upgrade CLARIS, OLLIE, OPRA and ARE Microsoft SQL Server 2000 databases to SQL Server 2005.                                    | <b>Complete</b>  |
| • Upgrade Microsoft Office Suite applications in all desktop computers and laptops to Office 2007.                               | <b>Complete</b>  |
| • Upgrade Microsoft Windows XP Professional Operating System on all desktop computers and laptops to Microsoft Vista – Business. | <b>Complete</b>  |

## 12.3 Primary Activities

### Security Measures

Under state law, the Division of Insurance must establish and implement security mechanisms to ensure confidentiality and data integrity for any information that identifies an individual. After numerous incidents of data breaches reported in the news, the Division raised its security standard by augmenting its overall security strategy with an additional layer of security called data encryption. Today, the Division uses powerful encryption and strong access control to prevent unauthorized data access on all laptops. With this extra layer of security, the IT Group meets its commitment to ensuring full compliance with privacy regulations and the protection of the Division's brand image and reputation. In addition, this added security demonstrates compliance with internal and regulatory privacy requirements to auditors, senior management, and other stakeholders.

### Consumer Website Tools

In order to further the Division's mission of helping consumers make informed insurance decisions, the IT Group and several other departments embarked on a strategic initiative aimed at alleviating the challenge faced by consumers in the process of finding local agents selling the line of insurance suited to their particular need. The completion of the AgentFinder interactive tool on the external website streamlines this process by allowing consumers to easily find agents selling the various lines of insurance in a specific geographic area with a few clicks of the mouse. Consumers may perform an advanced search using several criteria in order to narrow the search by company, geographic area, or lines of insurance. In addition, AgentFinder and the auto insurance premium comparison website are linked, allowing users to conveniently transition from sample premium searches to agent searches. Insurance Producers benefit from AgentFinder because they can upload and present an array of demographic and business information on a public search tool used by potential insurance customers.

## Software Deployment

The Division is committed to adopting and deploying cutting-edge technology to streamline business processes, maximize efficiencies, improve productivity and consolidate its strategic advantage. To that end, the IT Group successfully completed the enterprise-wide upgrade of its CLARIS, OLLIE, OPRA & ARE SQL databases from Microsoft SQL 2000 to Microsoft SQL 2005. The immediate benefit of these upgrades includes enhancement features that improve database security and manageability; performance optimization of our database servers; and increased developer productivity. The performance monitoring and troubleshooting capabilities of the upgraded software, as well as the ease of data backup and recovery in the event of a disaster, represents a significant boost in protection for the agency. Prompted by the success of the SQL upgrade, the IT Group launched another enterprise-wide upgrade of the new and improved Windows Vista Business operating system on all desktop computers and laptops. In addition, all Microsoft office application suites installed on all Division desktop computers and laptops were upgraded to Office 2007 Professional. This successful deployment provided improvements in the searching and use of data; enabled mobile workers to stay connected and productive in and out of office; improved desktop security; and, facilitated easier desktop management.

## OLLIE (Online Licensing of Individuals and Entities) – Phase II



The IT Group, Administration and Producer Licensing Departments successfully enhanced the functionality of the OLLIE website to provide business entity producers the ability to renew their licenses online, as well as the ability to update their licensing profile with product and sales information that is helpful to consumers. This producer profile information populates the AgentFinder website, which connects consumers to insurance professionals based on criteria provided by the consumer. AgentFinder allows consumers to generate a list of agents from a database of the state's 70,000 licensed insurance professionals based on the geographic, product and company specifications that he or she selects. With the enhancements achieved in 2008, consumers can now find an insurance agency based on the same search criteria, in addition to its branch office locations.

# 13 - National Association of Insurance Commissioners Activity

Each year, the Division of Insurance participates in a range of activities through the National Association of Insurance Commissioners (NAIC). The ability to combine information, perspective and expertise with our counterparts in other states is vital to the Division's ability to accomplish our mission. Linkages and information-sharing from state to state take place as the NAIC committees work via email, webinars and conference calls throughout the year. In addition, staff from the Division attend NAIC meetings regularly.

## Property and Casualty Insurance (C) Committee

The mission of the Property and Casualty Insurance (C) Committee is to monitor and respond to regulatory issues associated with property or casualty insurance products, including issues regarding their delivery and cost. The Committee monitors property and casualty insurance markets and the surplus lines market. The Committee addresses regulatory issues associated with both personal lines (particularly auto and homeowners insurance) and commercial lines coverages. The Committee also monitors and responds to problems associated with financial reporting matters for property and casualty insurers that are of interest to regulatory actuaries and analysts and monitors and responds to problems associated with the financial aspects of the surplus lines market.

## Catastrophe Insurance Working Group (C)

This working group examines catastrophes and possible strategies to spread the risk of catastrophes across state, regional and federal programs in ways that may present a more efficient method of managing the risk of catastrophic losses.

## AIG Settlement Review Working Group (C)

This working group examines a settlement offer negotiated between the AIG Companies and the State of New York regarding incorrect workers' compensation reports filed by the AIG Companies that impacted their taxes, assessments and penalties in each of the states in which it does business. The work of this group led to the multi-state market conduct examination of AIG.

## Large Deductible Study Implementation Working Group (C)

Under the auspices of the Workers' Compensation Task Force, the Large Deductible Study Implementation Working Group (C) is appointed to assure that the NAIC charges presented in the Findings and Recommendations of the NAIC Workers' Compensation Large Deductible Study are properly completed.

## NAIC\IAIABC Joint Working Group (C)

Also under the Workers' Compensation Task Force, The NAIC/IAIABC Joint Working Group is appointed to study issues of mutual concern to insurance regulators and workers' compensation administrators and to review relevant model laws and papers and to consider possible charges in light of the joint working group recommendations.

The Working Group is composed of members from both the NAIC and the International Association of Industrial Accident Boards and Commissions (IAIABC). The Working Group studies issues of mutual concern to insurance regulators and workers compensation administrators. Through collaborative effort the Working Group has conducted surveys and written a number of white papers, as well as contributed in the development of various model laws, regulations, and guidelines for possible adoption through their respective organizations.

Staff from the Division's State Rating Bureau participated in all four of these (C) Committee working groups throughout 2008, attending NAIC quarterly meetings and participating in conference calls.

## Market Conduct and Consumer Affairs (D) Committee

The (D) Committee monitors aspects impacting the market regulatory process. This monitoring includes overseeing:

- The collection of market data
- Market Information Systems
- Automated applications
- The use of desk audits, examinations, interrogatories, investigations, and other resources for monitoring market activities
- The analysis of data relevant to market issues

In addition, the (D) Committee helps identify and develop uniform regulatory standards and solutions to problems related to market issues. As part of this function, the committee facilitates interstate communication and coordinates collaborative state regulatory actions. The committee also reviews and makes recommendations regarding the underwriting and market practices of insurers and producers as those practices affect insurance consumers, including availability and affordability of insurance.

### Market Analysis Working Group (D)

The Director of the Division's Market Conduct Section is one of sixteen national regulators selected to be an active member of the Market Analysis Working Group. The Group identifies and reviews insurance companies, which are, or may exhibit characteristics indicating a current or potential market regulatory issue that may impact multiple jurisdictions. The Working Group determines if regulatory action is being taken and supports collaborative actions in addressing problems identified.

During 2008, staff from the Division's Market Conduct section attended and participated in quarterly national meetings and monthly conference calls. In addition to performing its core functions, the Market Analysis Working Group drafted and finalized a policies and procedures document and best practices document for multi-state settlement agreements.

## Complaint Handling & Reporting Standards Working Group (D)

The Consumer Service Section (CSS) is a member of the D Committee's Complaint Handling & Reporting Standards Working Group. The charge of this working group is to create and promote uniformity in complaint handling and reporting. Ultimately, successfully accomplishing this mission will benefit regulators, companies, and consumers alike by ensuring that complaint data are meaningfully interpretable for market analysis and public information purposes, while at the same time improving regulator response and intervention on behalf of consumers.

During 2008, staff from the CSS took part in various conference calls with their counterparts from other states throughout the year to discuss complaint handling and reporting standards.

### Producer Licensing Working Group (D)

The Director of Producer Licensing is an active member of the (D) Committee's Producer Licensing Working Group. The Working Group's mission is to:

- Develop and implement uniform standards, interpretations and treatment of producer and adjuster licensees and licensing terminology
- Coordinate and consult with the National Insurance Producer Registry Board of Directors to develop and implement uniform producer licensing initiatives, with a primary emphasis on encouraging the use of electronic technology
- Monitor and respond to developments related to licensing reciprocity

As a member of the Working Group, the Director participates in regional and national SILA (Securities Insurance Licensing Administrators) meetings and occasional NAIC meetings. Participation in Working Group conference calls is ongoing throughout the year.

In 2008, the Working Group published a licensing handbook and updated the NAIC renewal applications in order to make them more user-friendly. As a result of the application changes, renewing producers no longer have to resubmit documentation of a legal nature if they have submitted and disclosed this information in past applications. This cuts down on the use of paper and streamlines the processing of renewing licensees.

## Financial Conditions (E) Committee

The mission of the Financial Condition (E) Committee is to be the central forum and coordinator of solvency-related considerations of the NAIC relating to accounting practices and procedures, blanks, valuation of securities, the Insurance Regulatory Information System (IRIS), financial analysis and solvency, zone examinations and examiner training and issues concerning insurer insolvencies and guarantees.

### Receivership and Insolvency Task Force (E)

The Division served as a member of the Receivership and Insolvency Task Force of the NAIC during 2007. The primary mission of this Task Force is to monitor insolvencies of insurance companies and insolvency guarantee funds nationwide. The duties associated with this group include:

- Monitoring the effectiveness and performance of state administration of receiverships and the state guaranty fund system
- Coordinating cooperation and communication among regulators, receivers and guaranty funds
- Monitoring ongoing receiverships and reporting on such receiverships to NAIC members
- Developing and providing educational and training programs in the area of insurer insolvencies and insolvency guarantees to regulators, professionals and consumers
- Developing and monitoring relevant model laws, guidelines and products
- Providing resources for regulators and professionals to promote efficient operations of receiverships and guaranty funds

Attorneys in the Legal Division represented the Commissioner of Insurance as a member of the Receivership Model Act Revision Working Group of the Receivership and Insolvency (E) Task Force. In 2008, these attorneys assisted the Working Group with amendments to the Property and Casualty Insurance Guaranty Association Model Act and the Life and Health Insurance Guaranty Association Model Act.

## Financial Analysis Working Group (E)

The Division also served as a member of the Financial Analysis Working Group during 2008. This group is a subgroup of the Financial Conditions (E) Committee. The mission of the Working Group is to:

- Analyze nationally significant insurers and groups that exhibit characteristics of trending toward or being financially troubled, and determine if appropriate action is being taken
- Interact with domiciliary regulators and lead states to assist and advise as to what may be the most appropriate regulatory strategies or action(s)
- Support, encourage, promote and coordinate multi-state efforts in addressing solvency problems
- Review and make appropriate updates and enhancements to the *NAIC Troubled Insurance Company Handbook*

### Accounting Practices and Procedures Task Force (E)

The Division served as a member of the Accounting Practices and Procedures Task Force during 2007. This task force is a subgroup of the Financial Conditions (E) Committee. The mission of the Task Force is to:

- Identify, investigate and develop solutions to accounting problems with the goal of guiding insurers in properly accounting for various aspects of their operations
- Modify the Accounting Practices and Procedures manuals to reflect changes necessitated by task force action
- Study innovative insurer accounting practices which affect the ability of regulators to determine the true financial condition of insurers

The group accomplishes this mission through various working groups, sub groups, and study groups. To facilitate their objectives, these groups hold numerous conference calls annually and meet at all of the national meetings. There were substantive revisions to SSAP 91R, SSAP 98, and SSAP 99 as well as lots of non-substantive revisions to other SSAP's during 2008.

## Financial Regulation Standards and Accreditation (F) Committee

The mission of the Financial Regulation Standards and Accreditation (F) Committee is the administration and enforcement of the NAIC Accreditation Program. This work includes:

- The consideration revision and interpretation of standards for accreditation
- The evaluation and interpretation of states' laws and regulations, and departments' practices, procedures and organizations as they relate to compliance with standards
- The examination of members for compliance with standards, including the development of procedures for examination
- Selecting qualified individuals to examine members for compliance with standards
- Making decisions regarding whether or not to accredit members

Each year, the Division of Insurance includes the maintenance of NAIC accreditation among its primary goals. As a condition of maintaining and retaining NAIC accreditation, Massachusetts must complete an Interim Annual Review (IAR) Guide for the NAIC accreditation staff each year. The NAIC reviews, analyzes, and evaluates the IAR, and then makes recommendations to the Financial Regulation Standards and Accreditation (F) Committee.

In 2008, Massachusetts' Interim Annual Review Guide was received in March from the NAIC. Staff from the Division's Financial Examinations section completed and returned the Guide to the NAIC on April 16th. The NAIC Accreditation Staff stated in a memo to the Financial Regulation Standards and Accreditation Committee that Massachusetts met the requirements of the IAR and continued accreditation was recommended.

Throughout the year, staff from the Financial Examinations section receive updates on NAIC current developments and emerging issues. This is accomplished by attending the quarterly NAIC national meetings and reviewing the minutes thereof, attending the annual NAIC Financial Summit, various webinar training sessions, conference calls on specific issues, and reviewing NAIC quarterly meeting issue papers and current hot topic NAIC emails.

## NAIC Pre-Accreditation Review

In April 2008, the Division underwent a comprehensive NAIC Pre-Accreditation Review performed in the Boston office by a Senior NAIC Accreditation Manager. The objective of the voluntary pre-review was to assist the Financial Examination and Financial Analysis sections in preparing for the upcoming full review scheduled for March 30 – April 3, 2009. The Accreditation Manager's visit noted "no material issues" and provided valuable insight and advice to help us prepare for the spring 2009 formal accreditation review.

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## Capital and Surplus Relief Working Group (EX)

In November, 2008, the American Council of Life Insurers (ACLI) sent a letter to the NAIC seeking modifications to existing statutory accounting and actuarial guidelines for the year-end 2008 reporting purposes. The NAIC formed the Capital and Surplus Relief Working Group (EX) to review the ACLI request. The Working Group then enlisted the aid of several NAIC technical groups to provide their initial analyses of the ACLI proposal. In addition to a public comment period that ended Dec. 26, 2008, the Working Group held a public hearing on January 27, 2009 to gather additional comments and information.

On January 29, 2009, the NAIC Executive Committee voted to not forward the Working Group items of relief to Plenary for vote. This action, therefore, halted the progress of the ACLI proposed items from advancing. The Executive Committee recommended that the Working Group and the Task Force Committees continue work on the proposed items and work them through the NAIC normal process.

Financial Examination management closely monitored via conference calls and e-mails, the activities of the NAIC's Capital and Surplus Relief Working Group.

## Climate Change and Global Warming Task Force (EX)

The mission of the Climate Change Task Force is to serve as coordinator of the NAIC analysis of the impact of climate change on insurance consumers, insurance providers and insurance regulators. The Task Force examines the implications of climate change on insurer solvency, the availability of affordable insurance coverage for the nation's insurance consumers and its impact on insurance regulation.

Staff from the Division's State Rating Bureau participated in the Task Force throughout 2008, attending NAIC quarterly meetings and participating in conference calls.

## NAIC Surveys

The Administration Department completes the annual NAIC Resources Survey. This survey reports on the types of positions, salaries, number of positions, budget and revenue of the Division. The Department also completes a portion of the NAIC Interim Annual Review (IAR). The IAR reports on training programs, staff turnover, position qualifications, etc. for the financial examination and surveillance staff.

## Interstate Insurance Product Regulation Commission

In 2000, members of the NAIC unanimously adopted a blueprint for significant regulatory reforms to modernize state insurance regulation. The NAIC formed the Speed to Market Working Group (EX) to address regulatory efficiency issues as insurers facing competition from financial institutions sought a more effective filing and review process. The Working Group recommended a new system featuring:

- A single point of filing and review
- The development of national standards for insurance products
- A more efficient state-based procedure for processing and filing

In 2002, NAIC members decided that the facilitation of interstate cooperation and the development of national uniform standards applicable in multiple states would best be served by an interstate compact. Throughout 2002 and 2003, the working group worked closely the National Conference of State Legislatures (NCSL), the National Conference of Insurance Legislators (NCOIL), the National Association of Attorneys General (NAAG), and other state officials to further refine and enhance the Interstate Insurance Compact Model legislation. By May of 2006, more than 26 states with over 40% of the nationwide premium volume had enacted the Compact legislation. This threshold created the Interstate Insurance Product Regulation Commission (IIPRC), thereby establishing a central point for filing various insurance products. In August of 2006, the Governor signed Chapter 223 of the Acts of 2006, allowing Massachusetts to join the Compact

Within six months of its creation, the IIPRC adopted its first Uniform Standards. In the spring of 2008, experienced regulators and actuaries joined the IIPRC staff. Annual registration fees were instituted and collected from companies filing with the IIPRC and the Commission adopted a code of ethics. In the summer and fall of 2008, additional states joined the Compact, bringing the premium volume represented to more than 50% of the premium volume nationwide. Additional uniform standards were developed and adopted, bringing the total number of standards to 46 by the end of 2008. Work continues to adopt more Uniform Standards and to enhance the procedures to receive product filings on behalf of the IIPRC Member States.

Today, the IIPRC has 35 members - including Massachusetts - representing half of the nationwide premium volume. The Interstate Insurance Compact is an important modernization initiative that benefits state insurance regulators, consumers and the insurance industry. The Compact enhances the efficiency and effectiveness of the review and approval of insurance filings, allowing consumers to have faster access to competitive insurance products. The Compact promotes uniformity through the application of national product standards embedded with strong consumer protections. The IIPRC continues to adopt additional uniform standards, outreach to more states to join the Compact, and encourage insurers to utilize the IIPRC central point of product filing.

In addition to serving as a member of the Compact, Massachusetts serves on the Management and Communications Committees and participates on the Product Standards and Rulemaking Committees.



# Appendix A - Acts, Regulations & Bulletins

## Regulations

**211 C.M.R. 20.00**  
**Risk-Based Capital for Insurers**

This amended regulation sets out the calculation to determine the level of risk-based capital that insurers are required to maintain. The amended regulation provides that a property and casualty insurer would trigger a Company Action Level Event if the company experiences a certain level of downward trend in capital. Such a trigger already exists for life and health companies.

**211 C.M.R. 26.00**  
**Annual Financial Reporting for Years Ending 2010 and After**

This new regulation requires insurers and health maintenance organizations (HMOs) to report more financial information, thereby providing enhanced regulatory oversight. The regulation will assist the Division of Insurance in monitoring the solvency of insurers and HMOs by strengthening internal controls and improving corporate governance.

**211 C.M.R. 52.00**  
**Managed Care Consumer Protections and Accreditation of Carriers**

This amended regulation requires managed care organizations to recognize nurse practitioners as participating providers and/or primary care providers on a nondiscriminatory basis. It also requires carriers that utilize behavioral health managers to comply with requirements for disclosures.

**211 C.M.R. 86.00**  
**Reductions in Premium Charges for Private Passenger Motor Vehicles and Certain Commercial Motor Vehicles Equipped With an Anti-Theft Mechanism (Repealed)**

This regulation was repealed because it is outdated. Moreover, it is not necessary for the Commissioner of Insurance to designate “high theft vehicles” by regulation because she has the authority to designate such vehicles in accordance with M.G.L. c. 175, § 113H.

**211 C.M.R. 93.00**  
**Cost and Expense Containment for Motor Vehicle Insurers (Repealed)**

This regulation was repealed because it is outdated.

**211 C.M.R. 124.00**  
**Reductions in Premium Charges for Private Passenger Motor Vehicles and Certain Commercial Motor Vehicles Equipped With Certain Safety Features (Repealed)**

This regulation was repealed because it is outdated. In a competitive market, insurers are obligated, pursuant to M.G.L. c. 175E, § 4(d), to include in their rates appropriate reductions in premium charges for vehicles that are less damageable than others due to safety features incorporated into such vehicles. It is not necessary, therefore, for the Commissioner of Insurance to establish such reductions in premium charges by regulation during a competitive market.

**211 C.M.R. 134.00**  
**Safe Driver Insurance Plan**

This regulation was amended to provide for the continuous, timely, accurate and uniform collection and exchange of private passenger motor vehicle insurance claim and traffic law violation data, both when private passenger motor vehicle insurance rates are fixed and established pursuant to M.G.L. c. 175, § 113B, and when such rates are filed on a competitive basis pursuant to M.G.L. c. 175E and M.G.L. c. 175A.

**212 C.M.R. 2.04**  
**Procedures for the Conduct of Appraisals and Intensified Appraisals**

This regulation was amended to facilitate and expedite the process for the repair of damaged automobiles, and to provide guidance to insurance appraisers and repair shops with regard to the procedures for expedited supplemental appraisals.

## Bulletins

**Bulletin 2008-01**  
**Amendments Created by Chapter 205 of the Acts of 2007 Related to Eligibility as a Dependent in an Insured Health Plan**

Issued to inform carriers of new provisions related to eligibility for a dependent in an insured health plan. Effective January 1, 2008, this Bulletin 2008-01 replaces the Division's prior Bulletin 2007-01.

**Bulletin 2008-02**  
**Requirements for Disclosure of Minimum Creditable Coverage**

Issued to provide insurers with guidance regarding the Massachusetts Health Care Reform Law requirement that all Massachusetts residents eighteen years of age and older have health coverage that meets the Minimum Creditable Coverage standards as set by the Commonwealth Health Insurance Connector.

**Bulletin 2008-03**  
**Addendum to "2008 Guide to Health Insurance for People with Medicare"**

Issued to notify insurers that they must provide individuals eligible for Medicare with a copy of *Massachusetts Bulletin for People with Medicare* and the *2008 Guide to Health Insurance for People with Medicare*.

**Bulletin 2008-04**  
**Filing Procedures for Compliance with the Provisions of the Terrorism Risk Insurance Program Reauthorization Act of 2007**

Issued to inform insurers of certain provisions contained in the Terrorism Risk Insurance Program Reauthorization Act of 2007, an Act amending the Terrorism Risk Insurance Act of 2002.

**Bulletin 2008-04**  
**Supplemental Filing  
Procedures Notice**

Issued to notify insurers that rate and form filings submitted to comply with the federal Terrorism Risk Insurance Program Reauthorization Act of 2007 also must meet the Division's filing and fee requirements for other property and casualty products.

**Bulletin 2008-05**  
**Distribution of Consumer  
Information Guides and  
Additional Policy  
Information Materials for  
Private Passenger Motor  
Vehicles Insurance Policies  
with Effective Dates on and  
after April 1, 2008**

Issued to inform insurers about the Division's distribution requirements related to certain consumer and policy information materials

**Bulletin 2008-06**  
**Availability of Private  
Passenger Motor Vehicle  
Insurance Rate Filings for  
Public Inspection**

Issued to inform all interested persons of the Division's practices regarding the availability of private passenger motor vehicle insurance rate filings for public inspection.

**Bulletin 2008-07**  
**Requirements for Private  
Passenger Motor Vehicle  
Insurance Policies Issued for  
Terms of Six Months**

Issued to provide guidance to insurance producers and companies regarding voluntary private passenger motor vehicle insurance policy endorsements limiting the coverage term to six consecutive months.

**Bulletin 2008-08**  
**Guidelines for the  
Submission of Form, Rate  
and Rule Filing Materials for  
Review by the Massachusetts  
Division of Insurance**

Issued to advise rating organizations and carriers about the requirements governing the submission of form, rate, and/or rule filings for certain insurance products.

**Bulletin 2008-09**  
**Regulatory Review Standards  
Applicable to Private  
Passenger Motor Vehicle  
Insurance Rate Filings in the  
Residual Market for Rates  
Effective April 1, 2009  
through March 31, 2010**

Issued to advise insurers of the standards applicable to private passenger motor vehicle insurance rate filings for residual market policies submitted by Commonwealth Automobile Reinsurers (CAR).

**Bulletin 2008-10**  
**Documenting Transfers of  
Private Passenger Motor  
Vehicle Insurance**

Issued to notify insurance producers and insurers that Massachusetts law does not require the use of a particular form of notice of transfer when transferring insurance on private motor vehicles.

**Bulletin 2008-11**  
**Regulatory Review Standards**  
**Applicable to Private**  
**Passenger Motor Vehicle**  
**Insurance Rate Filings in the**  
**Voluntary Market for Rates**  
**Effective April 1, 2009**  
**through March 31, 2010**

Issued to notify insurers of the standards governing the Commissioner of Insurance's review of voluntary private passenger motor vehicle insurance rate filings for rates effective April 1, 2009 through March 31, 2010.

**Bulletin 2008-12**  
**Clarification of Coordination**  
**of Benefits under M.G.L. c.**  
**90, §34A and the**  
**interrelationship by and**  
**among PIP, Health**  
**Insurance and Medical**  
**Payments**

Issued to address the order for the coordination of benefits by and among Personal Injury Protection (PIP) coverage, Medical Payments (MedPay) coverage, and health coverage by a health insurance carrier for motor vehicle accident claimants. The Bulletin also discusses certain provisions of previously issued Division Bulletin 1990-02.

**Bulletin 2008-13**  
**Designation of "High-Theft**  
**Vehicles" and Prescribed**  
**Anti-Theft or Auto Recovery**  
**Devices**

Issued to inform insurers in Massachusetts of the Commissioner's designation of "high-theft vehicles" and anti-theft devices in accordance with her authority under M.G.L. c. 175, § 113H.

**Bulletin 2008-14**  
**AIG Life and Annuity**  
**Insurers**

Issued to inform insurers of their obligations associated with the solicitation and replacement of life insurance and annuities. More specifically, the bulletin reminds such insurers of their legal obligation to ensure that policyholders of AIG life and annuity insurers are not subject to misleading or unsuitable replacement solicitations or sales.

**Bulletin 2008-15**  
**Building Partnerships with**  
**Insurers to Improve the Lives**  
**of Children**

Issued to inform insurers of the insurance match initiative available through the U.S. Department of Health and Human Services. The goal of the federal program is to identify those individuals who are delinquent in their child support payments before these individuals receive any insurance proceeds.

**Bulletin 2008-16**  
**Coverage for Inherited**  
**Diseases of Amino Acids and**  
**Organic Acids**

Issued to notify insurers of Chapter 214 of the Acts of 2008, An Act Increasing Coverage of Nonprescription Enteral Formulas, and the resulting increased mandated benefit coverage for low protein food products.

**Bulletin 2008-17**  
**Policy Placement**  
**Requirements for Private**  
**Passenger Motor Vehicle**  
**Insurance Policies with**  
**Effective Dates On or After**  
**April 1, 2009**

Issued to inform insurers about requirements for policy placement among company affiliates within an insurer group or among risk categories within a single company for those private passenger motor vehicle insurance policies with effective dates on or after April 1, 2009. Such requirements are designed to promote fair and transparent business practices in both the voluntary and residual private passenger motor vehicle insurance markets.

**Bulletin 2008-18**  
**Filing Guidelines for**  
**Compliance with Chapter 230**  
**of the Acts of 2008**

Issued to inform insurers of filing guidelines under Chapter 230 of the Acts of 2008, An Act Relative to Equitable Coverage for Annuity Policies, and to clarify certain provisions of the new law. This new law requires insurers to calculate reserves on a gender neutral or gender blended basis. It also requires all individual and group annuity contracts issued on or after January 1, 2009 that cover residents of Massachusetts to be neutral as to race, color, religion, sex, marital status or national origin with regard to pricing and benefits.

**Bulletin 2008-19**  
**Guidelines for Submission of**  
**Fees Associated with Form,**  
**Rate and Rule Materials**

Issued to inform rating organizations and insurance carriers of guidelines for the submission of fees associated with form, rate and rule materials filed with the Division of Insurance and to expand and clarify certain provisions of Division Bulletin 2008-08 issued on May 20, 2008, which governed a similar topic.

**Bulletin 2008-20**  
**Licensing Requirements for**  
**Variable Life/Variable**  
**Annuities Lines of Authority**

Issued to clarify the licensing requirements for insurance producers and companies marketing and selling variable life or annuity products, regardless of whether they are group or individual products. Specifically, the Bulletin notifies insurance producers and insurers that to be licensed to sell variable life and variable annuity products in the Commonwealth, and insurance producer must also: (1) have successfully passed a life insurance examination; (2) have successfully passed the FINRA (formerly NASD) Series 6 or Series 7 examinations; (3) be actively licensed and in good standing with FINRA; (4) must possess a valid FINRA Central Registration Depository (CRD) number; and (5) be affiliated with a registered broker/dealer who also is in good standing with FINRA.

# Appendix B - Select 2008 Financial Information from Massachusetts Domestic Insurance Companies

## Property & Casualty Insurance Companies

NAIC #	Company Name	Total Premium Written in MA as of 12/31/2008	Total Premium Written as of 12/31/2008	Total Assets as of 12/31/2008	Total Liabilities as of 12/31/2008	Total Policyholder Surplus as of 12/31/2008
10017	Arbella Ind Ins Co	\$6,802,055	\$7,306,630	\$45,466,747	\$28,220,208	\$17,246,540
10206	Medical Professional Mut Ins Co	\$136,944,563	\$136,944,563	\$2,246,106,520	\$1,634,001,426	\$612,105,094
10230	Commonwealth Reins Co	\$0	\$0	\$35,552,202	\$21,790,171	\$13,762,031
10231	Commonwealth Mut Ins Co	\$5,648,078	\$5,648,078	\$5,705,883	\$205,883	\$5,500,000
10394	Bunker Hill Ins Co	\$33,839,826	\$39,403,539	\$41,988,894	\$22,234,129	\$19,754,765
10638	Proselect Ins Co	\$2,388,415	\$169,097,052	\$76,135,093	\$54,770,573	\$21,364,520
10664	Endeavour Ins Co	\$4,884,496	\$4,884,496	\$4,715,541	\$32,433	\$4,683,108
11104	Associated Employers Ins Co	\$16,037,181	\$16,037,181	\$4,306,596	\$495,941	\$3,810,655
11984	Independence Cas Ins Co	\$11,813,429	\$11,840,654	\$3,628,248	\$38,363	\$3,589,885
12154	Encompass Ins Co of MA	\$93,377,139	\$93,377,139	\$6,144,860	\$117,648	\$6,027,212
12484	Liberty Mut Personal Ins Co	\$0	\$0	\$4,653,908	\$131	\$4,653,777
12725	New England Mut Ins Co	\$0	\$0	\$27,057,558	\$6,692,638	\$20,364,920
12808	Safety Prop & Cas Ins Co	\$2,109,472	\$2,112,096	\$34,085,195	\$21,422,658	\$12,662,537
12850	Premier Ins Co Of MA	\$233,279,432	\$233,279,432	\$457,699,898	\$249,598,147	\$208,101,751
12886	Massachusetts Employers Ins Co	\$11,907,292	\$11,907,292	\$3,723,592	\$468,261	\$3,255,331
13083	Employers Security Assur Co	\$607,607	\$607,607	\$3,127,124	\$75,726	\$3,051,398
13163	Hospitality Mut Ins Co	\$4,581,221	\$4,581,221	\$37,933,737	\$22,144,674	\$15,789,063
13374	Arrow Mut Liab Ins Co	\$3,553,941	\$3,836,894	\$45,031,206	\$17,969,110	\$27,062,096
13463	Barnstable Cnty Mut Ins Co	\$31,440,257	\$31,440,257	\$74,856,344	\$23,454,186	\$51,402,158
13706	Dorchester Mut Ins Co	\$22,312,701	\$24,326,389	\$47,997,445	\$24,083,368	\$23,914,077
13943	Fitchburg Mut Ins Co	\$14,565,065	\$31,267,982	\$68,346,878	\$34,681,610	\$33,665,268
14192	Hingham Mut Fire Ins Co	\$30,923,925	\$43,870,365	\$102,527,517	\$62,679,811	\$39,847,706
14206	Holyoke Mut Ins Co In Salem	\$27,673,777	\$43,271,968	\$188,495,457	\$113,392,990	\$75,102,467
14737	Plymouth Rock Assur Corp	\$219,011,022	\$231,774,625	\$400,206,618	\$292,077,459	\$108,129,159
15067	Quincy Mut Fire Ins Co	\$172,191,175	\$263,152,313	\$1,061,024,917	\$441,038,663	\$619,986,254
17000	Arbella Mut Ins Co	\$446,520,074	\$446,520,074	\$948,785,808	\$511,007,038	\$437,778,770
19763	Bay State Ins Co	\$0	\$22,957,657	\$293,936,371	\$113,756,068	\$180,180,304
19771	Cambridge Mut Fire Ins Co	\$36,902,849	\$114,174,098	\$559,931,537	\$274,567,646	\$285,363,891
19798	Merrimack Mut Fire Ins Co	\$150,371,568	\$286,580,190	\$921,026,795	\$394,566,983	\$526,459,814
20613	Sparta Ins Co	\$48,393	\$30,590,101	\$280,417,762	\$26,358,174	\$254,059,588
20621	OneBeacon Amer Ins Co	\$31,866,503	\$419,853,361	\$731,111,202	\$434,822,149	\$296,289,053
20648	Employers Fire Ins Co	\$92,718,391	\$421,347,304	\$92,956,242	\$39,847,368	\$53,108,874
21261	Electric Ins Co	\$28,853,919	\$376,022,064	\$1,250,575,618	\$900,532,648	\$350,042,970
21750	Pilgrim Ins Co	\$53,376,885	\$53,376,885	\$30,623,279	\$21,618,687	\$9,004,592
23043	Liberty Mut Ins Co	\$407,339,172	\$3,482,787,666	\$32,549,788,186	\$22,215,055,768	\$10,334,732,418
23965	Norfolk & Dedham Mut Fire Ins Co	\$93,771,916	\$98,115,344	\$240,199,057	\$125,625,375	\$114,573,682
31887	Coface N Amer Ins Co	\$3,197,677	\$79,745,471	\$101,986,490	\$52,749,038	\$49,237,452

33618	Safety Ind Ins Co	\$72,315,419	\$72,322,942	\$91,431,410	\$52,151,892	\$39,279,518
33758	Associated Industries Of MA Mut Ins	\$61,681,988	\$69,221,121	\$354,947,570	\$230,777,723	\$124,169,847
34754	Commerce Ins Co	\$1,335,297,056	\$1,345,189,985	\$2,579,440,310	\$1,601,612,726	\$977,827,584
36226	United Cas & Surety Ins Co	\$2,936,359	\$3,266,178	\$11,863,188	\$7,960,575	\$3,902,613
37346	Danbury Ins Co	\$557,165	\$7,371,038	\$18,318,499	\$10,690,296	\$7,628,203
38369	Northern Assur Co Of Amer	\$10,792,474	\$136,125,167	\$284,255,397	\$132,489,467	\$151,765,930
39454	Safety Ins Co	\$499,040,977	\$499,074,106	\$1,220,900,338	\$665,672,685	\$555,227,653
39659	Eastern Cas Ins Co	\$0	\$0	\$28,218,794	\$25,589,266	\$2,629,528
40274	Citation Ins Co	\$116,191,302	\$116,191,302	\$321,291,872	\$206,493,024	\$114,798,848
40320	Massachusetts Homeland Ins Co	\$106,902,213	\$106,902,213	\$8,606,711	\$98,504	\$8,508,207
41360	Arbella Protection Ins Co	\$119,998,076	\$126,236,221	\$255,470,326	\$158,349,737	\$97,120,589
41955	Barnstable Cnty Ins Co	\$3,468,413	\$3,468,413	\$16,299,991	\$2,701,357	\$13,598,634
43702	Tower National Ins Co	\$4,757,935	\$98,043,642	\$63,657,699	\$51,498,792	\$12,158,907
44326	Atlantic Charter Ins Co	\$22,654,209	\$23,077,052	\$148,038,619	\$93,659,122	\$54,379,497
<b>TOTAL</b>		<b>\$4,787,453,002</b>	<b>\$9,848,527,368</b>	<b>\$48,430,597,049</b>	<b>\$31,421,938,315</b>	<b>\$17,008,658,738</b>

### Life Insurance Companies

NAIC #	Company Name	Total Premium Written in MA as of 12/31/2008	Total Premium Written as of 12/31/2008	Total Assets as of 12/31/2008	Total Liabilities as of 12/31/2008	Total Capital & Surplus as of 12/31/2008
61476	Boston Mut Life Ins Co	\$48,444,232	\$222,599,054	\$929,127,283	\$851,404,948	\$77,722,334
65099	John Hancock Life Ins Co	\$587,419,423	\$5,956,478,687	\$62,943,519,220	\$51,538,248,700	\$2,583,558,076
65315	Liberty Life Assur Co Of Boston	\$59,164,654	\$1,144,377,765	\$11,605,062,479	\$8,083,103,275	\$460,447,759
65919	Primerica Life Ins Co	\$36,180,991	\$1,702,654,013	\$5,958,953,136	\$4,486,405,459	\$1,472,547,677
65935	Massachusetts Mut Life Ins Co	\$916,059,860	\$13,682,401,622	\$114,294,058,643	\$74,979,077,441	\$8,462,931,020
66265	Monarch Life Ins Co	\$1,210,285	\$31,660,437	\$827,646,578	\$631,473,626	\$9,496,006
67598	Paul Revere Life Ins Co	\$13,791,128	\$420,386,828	\$4,710,076,613	\$4,369,773,466	\$340,303,147
67601	Paul Revere Variable Ann Ins Co	\$268,263	\$5,274,357	\$110,191,120	\$13,063,164	\$94,725,625
69140	First Allmerica Fin Life Ins Co	\$1,549,073	\$36,042,219	\$1,714,061,985	\$1,335,123,918	\$113,696,898
70435	The Savings Bank Life Ins Co Of MA	\$170,087,472	\$242,293,470	\$2,130,312,575	\$1,969,420,187	\$160,892,388
71714	Berkshire Life Ins Co of America	\$13,778,220	\$277,619,206	\$2,455,454,678	\$2,031,605,084	\$423,849,594
74920	Regal Reins Co	\$0	\$0	\$11,929,451	\$436,023	\$11,493,428
80896	Centre Life Ins Co	\$1,543,198	\$36,543,651	\$2,021,720,012	\$1,930,956,330	\$90,763,680
84654	US Branch Assumption Mut Life Ins Co	\$199,148	\$289,208	\$10,616,627	\$54,075	\$10,562,552
84824	Commonwealth Ann & Life Ins Co	\$8,272,057	\$171,122,760	\$5,334,785,643	\$1,240,999,089	\$390,621,839
90204	John Hancock Variable Life Ins Co	\$53,089,690	\$1,020,566,796	\$12,432,478,298	\$6,557,263,868	\$544,807,079
91626	New England Life Ins Co	\$193,068,628	\$1,736,320,247	\$8,966,118,072	\$1,360,540,447	\$469,364,293
93610	John Hancock Life & Hlth Ins Co	\$215,523	\$2,214,419	\$2,573,744,215	\$663,848,081	\$193,246,674
<b>TOTAL</b>		<b>\$2,104,341,845</b>	<b>\$26,688,844,739</b>	<b>\$239,029,856,628</b>	<b>\$162,042,797,181</b>	<b>\$15,911,030,069</b>



## Health Insurance Companies

NAIC #	Company Name	Total Premium Written in MA as of 12/31/2008	Total Premium Written as of 12/31/2008	Total Assets as of 12/31/2008	Total Liabilities as of 12/31/2008	Total Capital & Surplus as of 12/31/2008
11109	Neighborhood Hlth Plan Inc	\$843,790,581	\$843,790,581	\$288,278,157	\$135,038,782	\$153,239,375
12210	Dentegra Ins Co of New England	\$657,066	\$1,874,931	\$6,079,846	\$294,116	\$5,785,730
12219	BCBS of MA HMO Blue Inc	\$4,426,148,846	\$4,447,987,881	\$1,268,808,236	\$561,767,603	\$707,040,633
13203	Boston Medical Center Hlth Plan Inc	\$1,090,565,465	\$1,090,565,465	\$271,695,474	\$107,050,240	\$164,645,234
18975	HPHC Ins Co Inc	\$74,421,947	\$196,555,222	\$60,075,810	\$39,234,866	\$20,840,944
47093	Massachusetts Vision Serv Plan	\$16,416,341	\$16,416,341	\$14,525,008	\$1,918,444	\$12,606,564
52060	Dental Serv of MA Inc	\$362,584,664	\$362,584,664	\$225,110,403	\$77,197,681	\$147,912,722
53228	BCBS of MA	\$2,271,273,848	\$2,276,572,029	\$1,841,061,426	\$1,226,894,335	\$614,167,091
60117	Tufts Ins Co Inc	\$55,723,312	\$55,723,312	\$29,442,152	\$16,087,306	\$13,354,846
66828	Fallon Hlth & Life Assur Co	\$12,818,315	\$12,818,315	\$10,014,474	\$6,907,056	\$3,107,418
95299	Connecticare Of MA Inc	\$27,744,166	\$27,744,166	\$10,617,344	\$2,330,591	\$8,286,751
95520	CIGNA Hlthcare of MA Inc	\$13,228,634	\$13,228,634	\$7,294,046	\$2,468,692	\$4,825,354
95541	Fallon Comm Hlth Plan Inc	\$988,206,671	\$988,206,671	\$281,443,431	\$158,933,845	\$122,509,586
95673	Health New England Inc	\$287,185,121	\$289,346,020	\$86,164,730	\$47,790,776	\$38,373,954
95688	Tufts Assocd Hmo Inc	\$2,242,061,454	\$2,242,061,454	\$728,070,260	\$292,222,615	\$435,847,642
96717	Harvard Pilgrim Health Care New Eng	\$0	\$344,748,315	\$81,024,853	\$47,312,718	\$33,712,135
96911	Harvard Pilgrim Hlth Care Inc	\$1,971,473,319	\$2,049,437,834	\$748,226,342	\$361,493,558	\$386,732,784
<b>TOTAL</b>		<b>\$14,684,299,750</b>	<b>\$15,259,661,835</b>	<b>\$5,957,931,992</b>	<b>\$3,084,943,224</b>	<b>\$2,872,988,763</b>

## Fraternal Organizations

NAIC #	Company Name	Total Premium Written in MA as of 12/31/2008	Total Premium Written as of 12/31/2008	Total Assets as of 12/31/2008	Total Liabilities as of 12/31/2008	Total Capital and Surplus as of 12/31/2008
58130	Catholic Assn Of Foresters	\$203,331	\$254,927	\$13,040,289	\$6,633,652	\$6,406,636
58181	Supreme Council The Royal Arcanum	\$277,705	\$3,215,463	\$60,000,355	\$49,351,570	\$10,648,785
<b>TOTAL</b>		<b>\$481,036</b>	<b>\$3,470,390</b>	<b>\$73,040,644</b>	<b>\$55,985,222</b>	<b>\$17,055,421</b>



## Workers' Compensation Self-Insured Groups

Company Name	Gross Premium Written as of 12/31/08	Net Premium Written as of 12/31/08	Total Assets as of 12/31/08	Total Liabilities as of 12/31/08	Total Capital & Surplus as of 12/31/08
ABC Massachusetts Workers Comp Self-Ins Group, Inc.	\$1,896,207	\$1,623,696	\$4,181,918	\$4,181,918	\$0
Automotive Industries Compensation Corp.	\$4,841,842	\$4,385,816	\$7,111,243	\$7,111,243	\$0
Commonwealth Transportation Compensation Corporation	\$2,977,173	\$2,620,193	\$6,741,697	\$6,793,098	(\$51,401)
Construction Industries Compensation Corporation	\$2,450,090	\$2,132,150	\$3,074,330	\$3,244,912	(\$170,582)
Diocesan Facilities Self-Insurance Group, Inc.	\$1,020,086	\$832,251	\$4,506,325	\$1,060,086	\$3,446,239
HVAC Compensation Corp.	\$3,396,684	\$3,046,972	\$5,699,282	\$5,699,282	\$0
Independent Schools Compensation Corporation	\$6,990,795	\$6,535,480	\$17,410,063	\$17,424,990	(\$14,927)
Manufacturers of Massachusetts Compensation Group	\$1,643,744	\$1,466,669	\$2,921,728	\$2,927,953	(\$6,225)
Massachusetts Bay Self-Insurance Group, Inc.	\$2,771,275	\$2,282,312	\$3,273,364	\$2,877,953	\$395,411
Massachusetts Catholic Self-Insurance Group, Inc.	\$5,881,443	\$5,412,273	\$15,203,831	\$9,426,395	\$5,777,436
Massachusetts Care Self-Insurance Group, Inc.	\$4,630,026	\$4,221,230	\$8,891,835	\$8,891,835	\$0
Massachusetts Education and Gov't Assn. P&C Group	\$19,672,323	\$16,319,385	\$28,538,508	\$17,439,400	\$11,099,108
Massachusetts Healthcare Self-Insurance Group, Inc.	\$2,411,668	\$2,224,115	\$4,784,796	\$4,784,796	\$0
Massachusetts High Technology Self-Insurance Group	\$737,241	\$673,383	\$2,127,308	\$2,127,308	\$0
Massachusetts Manufacturing Self-Insurance Group, Inc.	\$3,378,126	\$3,100,279	\$6,924,111	\$6,824,111	\$100,000
Massachusetts McDonald's Operators Workers' Comp Group	\$1,203,102	\$1,068,783	\$2,437,967	\$2,437,967	\$0
Massachusetts NAHRO Insurance Group, Inc.	\$4,006,162	\$3,383,678	\$7,723,666	\$5,286,213	\$2,437,457
Massachusetts Retail Merchants Workers' Comp. Self-Ins Group,	\$16,515,866	\$15,322,809	\$33,604,928	\$33,604,928	\$0
Massachusetts Trade Self-Insurance Group, Inc.	\$4,718,277	\$4,454,845	\$6,001,502	\$6,001,502	\$0
MIIA Property-Casualty Group, Inc.	\$57,049,809	\$46,202,815	\$157,856,519	\$60,209,644	\$97,646,875
NEEIA Compensation, Inc.	\$5,547,763	\$5,277,449	\$16,475,735	\$16,475,735	\$0
Self Insured Lumber Businesses Assn, Inc.	\$4,708,743	\$4,150,043	\$12,742,326	\$12,707,651	\$34,675
School Transportation Assn. of MA Self-Ins Group, Inc.	\$2,622,277	\$2,302,046	\$4,525,455	\$4,525,455	\$0
Wholesale Retail Suppliers Compensation Corporation	\$2,277,703	\$2,030,614	\$3,505,315	\$3,511,409	(\$6,094)
<b>TOTAL</b>	<b>\$163,348,425</b>	<b>\$141,069,286</b>	<b>\$366,263,752</b>	<b>\$245,575,784</b>	<b>\$120,687,972</b>

# Appendix C – 2008 Direct Written Premium by Line of Insurance

## 2008 Premium and Market Share - ACCIDENT & HEALTH INSURANCE

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
79413	UnitedHealthcare Ins Co	CT	\$536,045,675	20.26%	61425	Trustmark Ins Co	IL	\$8,116,232	0.31%
65978	Metropolitan Life Ins Co	NY	\$169,307,207	6.40%	80624	American Progressive L&H Ins Of NY	NY	\$7,501,106	0.28%
60054	Aetna Life Ins Co	CT	\$152,303,116	5.76%	61476	Boston Mut Life Ins Co	MA	\$6,958,495	0.26%
62235	Unum Life Ins Co Of Amer	ME	\$147,087,723	5.56%	71870	Fidelity Security Life Ins Co	MO	\$6,502,496	0.25%
62308	Connecticut Gen Life Ins Co	CT	\$124,529,176	4.71%	65080	John Alden Life Ins Co	WI	\$6,149,079	0.23%
64246	Guardian Life Ins Co Of Amer	NY	\$114,915,833	4.34%	77828	Companion Life Ins Co	SC	\$5,630,956	0.21%
80314	Unicare Life & Health Ins Co	IN	\$89,584,717	3.39%	92916	United American Ins Co	NE	\$5,454,034	0.21%
73288	Humana Ins Co	WI	\$71,984,306	2.72%	61301	Ameritas Life Ins Corp	NE	\$5,141,782	0.19%
70815	Hartford Life & Accident Ins Co	CT	\$71,684,042	2.71%	71412	Mutual Of Omaha Ins Co	NE	\$5,001,161	0.19%
70025	Genworth Life Ins Co	DE	\$56,471,714	2.13%	60895	American United Life Ins Co	IN	\$4,629,767	0.18%
65099	John Hancock Life Ins Co	MA	\$54,801,334	2.07%	90611	Allianz Life Ins Co Of N Amer	MN	\$4,625,149	0.17%
65498	Life Ins Co Of N Amer	PA	\$44,753,398	1.69%	88072	Hartford Life Ins Co	CT	\$4,251,533	0.16%
97055	Mega Life & Hlth Ins Co The	OK	\$43,123,281	1.63%	60534	American Heritage Life Ins Co	FL	\$3,979,597	0.15%
66141	Health Net Life Ins Co	CA	\$37,758,662	1.43%	65021	Stonebridge Life Ins Co	VT	\$3,679,791	0.14%
67660	Pennsylvania Life Ins Co	PA	\$37,211,471	1.41%	69000	Northwestern Long Term Care Ins Co	WI	\$3,514,945	0.13%
66087	Mid West Natl Life Ins Co Of TN	TX	\$36,148,974	1.37%	65110	Kanawha Ins Co	SC	\$3,493,325	0.13%
68241	Prudential Ins Co Of Amer	NJ	\$33,523,386	1.27%	91529	Unimerica Ins Co	WI	\$3,082,266	0.12%
69019	Standard Ins Co	OR	\$32,739,788	1.24%	66168	Minnesota Life Ins Co	MN	\$3,049,150	0.12%
61263	Bankers Life & Cas Co	IL	\$30,500,916	1.15%	60410	American Fidelity Assur Co	OK	\$3,044,093	0.12%
80802	US Br SunLife Assur Co Of Canada	MI	\$30,226,416	1.14%	68772	Security Mut Life Ins Co Of NY	NY	\$2,735,835	0.10%
86231	Transamerica Life Ins Co	IA	\$29,873,242	1.13%	69345	Teachers Ins & Ann Assoc Of Amer	NY	\$2,557,983	0.10%
90328	First Hlth Life & Hlth Ins Co	TX	\$28,970,937	1.10%	69477	Time Ins Co	WI	\$2,485,254	0.09%
60380	American Family Life Assur Co of Col	NE	\$28,371,336	1.07%	91626	New England Life Ins Co	MA	\$2,379,358	0.09%
65315	Liberty Life Assur Co Of Boston	MA	\$27,453,710	1.04%	71439	Assurity Life Ins Co	NE	\$2,317,310	0.09%
62049	Colonial Life & Accident Ins Co	SC	\$27,374,736	1.03%	69078	Standard Security Life Ins Co Of NY	NY	\$2,122,686	0.08%
65676	Lincoln Natl Life Ins Co	IN	\$26,379,002	1.00%	65595	Lincoln Benefit Life Co	NE	\$2,105,953	0.08%
61271	Principal Life Ins Co	IA	\$26,288,873	0.99%	80837	Union Central Life Ins Co	OH	\$2,073,201	0.08%
68195	Provident Life & Accident Ins Co	TN	\$25,373,584	0.96%	76325	Senior Hlth Ins Co of PA	PA	\$2,070,014	0.08%
62146	Combined Ins Co Of Amer	IL	\$25,218,121	0.95%	70211	Reassure Amer Life Ins Co	IN	\$1,872,012	0.07%
65935	Massachusetts Mut Life Ins Co	MA	\$23,790,094	0.90%	70939	Gerber Life Ins Co	NY	\$1,844,033	0.07%
92711	HCC Life Ins Co	IN	\$22,951,403	0.87%	93777	Household Life Ins Co	MI	\$1,688,830	0.06%
67091	Northwestern Mut Life Ins Co	WI	\$22,222,029	0.84%	80896	Centre Life Ins Co	MA	\$1,543,198	0.06%
68381	Reliance Standard Life Ins Co	IL	\$20,616,119	0.78%	76112	Oxford Life Ins Co	AZ	\$1,502,739	0.06%
65005	RiverSource Life Ins Co	MN	\$20,332,476	0.77%	70319	Washington Natl Ins Co	IL	\$1,464,406	0.06%
67105	Reliastar Life Ins Co	MN	\$18,872,896	0.71%	64211	Guarantee Trust Life Ins Co	IL	\$1,360,601	0.05%
93440	HM Life Ins Co	PA	\$17,318,673	0.65%	62863	Trustmark Life Ins Co	IL	\$1,347,825	0.05%
66869	Nationwide Life Ins Co	OH	\$16,403,544	0.62%	60836	American Republic Ins Co	IA	\$1,333,141	0.05%
70408	Union Security Ins Co	IA	\$15,741,440	0.60%	80985	BCS Life Ins Co	IL	\$1,326,336	0.05%
68608	Symetra Life Ins Co	WA	\$14,181,506	0.54%	65781	Madison Natl Life Ins Co Inc	WI	\$1,283,023	0.05%
87726	MettLife Ins Co of CT	CT	\$13,312,427	0.50%	62944	AXA Equitable Life Ins Co	NY	\$1,280,359	0.05%
67598	Paul Revere Life Ins Co	MA	\$12,710,576	0.48%	62251	Concord Heritage Life Ins Co Inc	NH	\$1,198,107	0.05%
66281	Monumental Life Ins Co	IA	\$12,114,110	0.46%	66370	Mony Life Ins Co	NY	\$1,186,474	0.04%
71714	Berkshire Life Ins Co of Amer	MA	\$12,103,231	0.46%	80578	Physicians Mut Ins Co	NE	\$1,167,429	0.04%
80926	Sun Life & Hlth Ins Co	CT	\$10,866,545	0.41%	60275	American Bankers Life Assur Co Of FL	FL	\$1,151,350	0.04%
69868	United Of Omaha Life Ins Co	NE	\$9,815,725	0.37%	85561	Perico Life Ins Co	DE	\$1,112,997	0.04%
66842	AIG Life Ins Co	DE	\$9,713,157	0.37%	69914	Sears Life Ins Co	TX	\$1,111,029	0.04%
66915	New York Life Ins Co	NY	\$9,275,147	0.35%	60142	TIAA Cref Life Ins Co	NY	\$1,107,170	0.04%
71129	Fort Dearborn Life Ins Co	IL	\$9,246,826	0.35%	66265	Monarch Life Ins Co	MA	\$1,099,944	0.04%
68322	Great W Life & Ann Ins Co	CO	\$8,651,048	0.33%	80705	US Br Great West Life Assur Co	MI	\$1,082,785	0.04%
62626	Cuna Mut Ins Society	IA	\$8,284,229	0.31%	64580	Illinois Mut Life Ins Co	IL	\$987,831	0.04%
70106	United States Life Ins Co In NYC	NY	\$8,249,251	0.31%	68209	Provident Life & Cas Ins Co	TN	\$967,972	0.04%

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
60518	American Hlth & Life Ins Co	TX	\$923,842	0.03%	76694	London Life Reins Co	PA	\$78,441	0.00%
60186	Allstate Life Ins Co	IL	\$907,587	0.03%	63479	United Teacher Assoc Ins Co	TX	\$71,493	0.00%
61492	Liberty Life Ins Co	SC	\$891,983	0.03%	81078	American Ntwrk Ins Co	PA	\$54,096	0.00%
60526	American Family Life Assur Co of NY	NY	\$826,959	0.03%	70785	Pacificare Life & Hlth Ins Co	IN	\$48,396	0.00%
61751	Central States H & L Co Of Omaha	NE	\$792,410	0.03%	72850	United World Life Ins Co	NE	\$45,815	0.00%
71730	Continental Amer Ins Co	SC	\$783,784	0.03%	68284	Pyramid Life Ins Co	KS	\$45,431	0.00%
66680	National Life Ins Co	VT	\$782,331	0.03%	88668	Mutual Of Amer Life Ins Co	NY	\$44,100	0.00%
62286	Golden Rule Ins Co	IN	\$767,798	0.03%	65536	Genworth Life & Ann Ins Co	VA	\$41,604	0.00%
71455	Cardif Life Ins Co	KS	\$738,053	0.03%	97764	Idealife Ins Co	CT	\$37,732	0.00%
63126	Farm Family Life Ins Co	NY	\$720,120	0.03%	61883	Central United Life Ins Co	AR	\$37,543	0.00%
84824	Commonwealth Ann & Life Ins Co	MA	\$718,551	0.03%	76023	Columbian Life Ins Co	IL	\$35,588	0.00%
67172	Ohio Natl Life Ins Co	OH	\$717,674	0.03%	65722	Loyal Amer Life Ins Co	OH	\$34,398	0.00%
69515	Medamerica Ins Co	PA	\$627,721	0.02%	69140	First Allamerica Fin Life Ins Co	MA	\$33,817	0.00%
60577	American Income Life Ins Co	IN	\$604,908	0.02%	62359	Constitution Life Ins Co	TX	\$32,606	0.00%
82538	National Hlth Ins Co	TX	\$590,154	0.02%	70435	The Savings Bank Life Ins Co Of MA	MA	\$32,099	0.00%
66583	National Guardian Life Ins Co	WI	\$548,095	0.02%	61689	Aviva Life & Ann Co	IA	\$30,217	0.00%
80659	US Business of Canada Life Assur Co	MI	\$543,081	0.02%	60607	American Intl Life Assur Co of NY	NY	\$29,907	0.00%
64327	Harleysville Life Ins Co	PA	\$530,521	0.02%	61239	Bankers Fidelity Life Ins Co	GA	\$29,416	0.00%
68136	Protective Life Ins Co	TN	\$527,000	0.02%	90212	Great Southern Life Ins Co	TX	\$28,232	0.00%
69744	Union Labor Life Ins Co	MD	\$507,635	0.02%	11121	Unified Life Ins Co	TX	\$26,779	0.00%
69663	USAA Life Ins Co	TX	\$501,736	0.02%	60801	American Public Life Ins Co	OK	\$22,677	0.00%
61360	Reliastar Life Ins Co Of NY	NY	\$446,997	0.02%	68225	Nationwide Life Ins Co of Amer	PA	\$22,475	0.00%
61832	Chesapeake Life Ins Co	OK	\$435,803	0.02%	65900	Conseco Life Ins Co	IN	\$22,331	0.00%
62596	Union Fidelity Life Ins Co	IL	\$434,008	0.02%	77968	Family Heritage Life Ins Co Of Amer	OH	\$20,881	0.00%
69116	State Life Ins Co	IN	\$432,285	0.02%	61409	National Benefit Life Ins Co	NY	\$20,318	0.00%
71854	AAA Life Ins Co	MI	\$398,445	0.02%	86509	Ing Life Ins & Ann Co	CT	\$18,464	0.00%
81426	Commercial Travelers Mut Ins Co	NY	\$397,480	0.02%	65951	Merit Life Ins Co	IN	\$18,425	0.00%
63312	Great Amer Life Ins Co	OH	\$391,984	0.01%	62952	Equitable Life & Cas Ins Co	UT	\$18,302	0.00%
68160	Balboa Life Ins Co	CA	\$341,885	0.01%	65919	Primerica Life Ins Co	MA	\$18,219	0.00%
60488	American Gen Life Ins Co	TX	\$298,460	0.01%	62065	Colonial Penn Life Ins Co	PA	\$15,896	0.00%
67539	Pan Amer Life Ins Co	LA	\$290,762	0.01%	81434	First Rehab Life Ins Co Of Amer	NY	\$15,237	0.00%
68047	Professional Ins Co	TX	\$284,716	0.01%	62634	Delaware Amer Life Ins Co	DE	\$13,233	0.00%
63665	General Amer Life Ins Co	MO	\$276,035	0.01%	66672	American Gen Life & Acc Ins Co	TN	\$12,783	0.00%
91472	Globe Life & Accident Ins Co	NE	\$269,996	0.01%	67199	Old Amer Ins Co	MO	\$12,435	0.00%
63258	Federated Life Ins Co	MN	\$230,077	0.01%	65331	Liberty Natl Life Ins Co	NE	\$12,184	0.00%
70688	Transamerica Financial Life Ins Co	NY	\$229,952	0.01%	63967	Government Personnel Mut Life Ins Co	TX	\$11,868	0.00%
67644	Penn Mut Life Ins Co	PA	\$229,114	0.01%	65927	Lincoln Heritage Life Ins Co	IL	\$11,063	0.00%
94358	USable Life	AR	\$223,130	0.01%	66427	MTL Ins Co	IL	\$10,972	0.00%
68373	American Gen Assur Co	IL	\$199,759	0.01%	62057	Lincoln Life & Ann Co of NY	NY	\$10,851	0.00%
70580	Humanadental Ins Co	WI	\$195,213	0.01%	67784	Philadelphia Amer Life Ins Co	TX	\$10,494	0.00%
61069	Anthem Life Ins Co	IN	\$194,467	0.01%	67903	Provident Amer Life & Hlth Ins Co	OH	\$6,818	0.00%
67814	Phoenix Life Ins Co	NY	\$191,262	0.01%	62383	Centurion Life Ins Co	IA	\$5,879	0.00%
89206	Ohio Natl Life Assur Corp	OH	\$191,227	0.01%	31119	Medico Ins Co	NE	\$5,060	0.00%
68721	Security Life Ins Co Of Amer	MN	\$185,996	0.01%	64017	Jefferson Natl Life Ins Co	TX	\$5,006	0.00%
65129	Kansas City Life Ins Co	MO	\$185,513	0.01%	60739	American Natl Ins Co	TX	\$4,518	0.00%
71404	Continental Gen Ins Co	OH	\$170,252	0.01%	93742	Securian Life Ins Co	MN	\$4,478	0.00%
71773	American Natl Life Ins Co Of TX	TX	\$158,893	0.01%	84786	Colorado Bankers Life Ins Co	CO	\$4,414	0.00%
67369	Alta Hlth & Life Ins Co	IN	\$143,719	0.01%	99937	Columbus Life Ins Co	OH	\$4,256	0.00%
62553	Country Life Ins Co	IL	\$136,851	0.01%	69256	Sunamerica Life Ins Co	AZ	\$3,791	0.00%
61212	Baltimore Life Ins Co	MD	\$133,523	0.01%	69310	Surety Life Ins Co	NE	\$3,137	0.00%
80675	US Business of Crown Life Ins Co	MI	\$127,170	0.00%	76236	Cincinnati Life Ins Co	OH	\$3,005	0.00%
80799	Cellic Ins Co	IL	\$121,622	0.00%	89184	Sterling Investors Life Ins Co	GA	\$2,768	0.00%
86355	Standard Life & Accident Ins Co	OK	\$110,418	0.00%	72125	Physicians Life Ins Co	NE	\$1,724	0.00%
60682	Conseco Ins Co	IL	\$96,084	0.00%	66974	North Amer Co Life & Hlth Ins	IA	\$1,636	0.00%
65242	Lafayette Life Ins Co	IN	\$84,810	0.00%	61727	Central Reserve Life Ins Co	OH	\$1,629	0.00%
64513	Horace Mann Life Ins Co	IL	\$83,233	0.00%	62103	Columbian Mut Life Ins Co	NY	\$1,449	0.00%

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	
62928	EMC Natl Life Co	IA	\$1,307	0.00%	67261	Old Republic Life Ins Co	IL	\$36	0.00%	
65870	Manhattan Life Ins Co	NY	\$1,164	0.00%	86126	Members Life Ins Co	IA	\$26	0.00%	
63657	Garden State Life Ins Co	TX	\$1,138	0.00%	68357	Reliable Life Ins Co	MO	\$20	0.00%	
71153	Hartford Life & Ann Ins Co	CT	\$1,103	0.00%	91693	IA Amer Life Ins Co	GA	\$9	0.00%	
62413	Continental Assur Co	IL	\$1,014	0.00%	Total Direct Written Premium				\$2,645,528,150	100.0%
60704	Wilton Reassurance Life Co of NY	NY	\$697	0.00%						
70114	Unity Mut Life Ins Co	NY	\$509	0.00%						
60038	Acacia Life Ins Co	DC	\$502	0.00%						
84654	US Branch Assumption Mut Life Ins Co	MA	\$455	0.00%						
65056	Jackson Natl Life Ins Co	MI	\$350	0.00%						
65838	John Hancock Life Ins Co (USA)	MI	\$186	0.00%						
71323	Zale Life Ins Co	AZ	\$155	0.00%						
71471	Medico Life Ins Co	NE	\$139	0.00%						
67989	American Memorial Life Ins Co	SD	\$126	0.00%						
69930	United Ins Co Of Amer	IL	\$119	0.00%						
88536	Protective Life And Annuity Ins Co	AL	\$118	0.00%						
66044	Midland Natl Life Ins Co	IA	\$88	0.00%						
64831	Intramercia Life Ins Co	NY	\$76	0.00%						
61735	Central Security Life Ins Co	TX	\$73	0.00%						

**2008 Premium and Market Share - AIRCRAFT (ALL PERILS)**

	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
	23817	Illinois Natl Ins Co	IL	\$7,105,479	31.96%
	37885	XL Specialty Ins Co	DE	\$1,676,631	7.54%
	34274	Central States Ind Co Of Omaha	NE	\$1,627,491	7.32%
	24147	Old Republic Ins Co	PA	\$1,620,415	7.29%
	35300	Allianz Global Risks US Ins Co	CA	\$1,304,176	5.87%
	23043	Liberty Mut Ins Co	MA	\$1,286,681	5.79%
	22039	General Reins Corp	DE	\$1,247,041	5.61%
	22667	Ace Amer Ins Co	PA	\$1,246,665	5.61%
	29599	US Specialty Ins Co	TX	\$966,516	4.35%
	19720	American Alt Ins Corp	DE	\$830,569	3.74%
	40045	Starnet Ins Co	DE	\$679,383	3.06%
	12904	Tokio Marine & Nichido Fire Ins Co	NY	\$551,940	2.48%
	10367	Avemco Ins Co	MD	\$551,782	2.48%
	11150	Arch Ins Co	MO	\$476,391	2.14%
	20281	Federal Ins Co	IN	\$424,875	1.91%
	20362	Mitsui Sumitomo Ins Co of Amer	NY	\$187,710	0.84%
	20699	Ace Prop & Cas Ins Co	PA	\$145,612	0.65%
	33022	AXA Ins Co	NY	\$127,579	0.57%
	34037	Hallmark Ins Co	AZ	\$112,847	0.51%
	24767	St Paul Fire & Marine Ins Co	MN	\$27,220	0.12%
	21121	Westchester Fire Ins Co	NY	\$25,705	0.12%
	20532	Clarendon Natl Ins Co	NJ	\$8,317	0.04%
	22730	Allied World Reins Co	NJ	\$373	0.00%
	Total Direct Written Premium			\$22,231,398	100.00%

## 2008 Premium and Market Share - ANNUITIES

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
69345	Teachers Ins & Ann Assoc Of Amer	NY	\$801,543,662	10.70%	74780	Integrity Life Ins Co	OH	\$14,448,143	0.19%
91596	New York Life Ins & Ann Corp	DE	\$462,480,087	6.17%	66281	Monumental Life Ins Co	IA	\$13,867,130	0.19%
61689	Aviva Life & Ann Co	IA	\$396,498,169	5.29%	62626	Cuna Mut Ins Society	IA	\$11,848,980	0.16%
86509	Ing Life Ins & Ann Co	CT	\$379,834,490	5.07%	68381	Reliance Standard Life Ins Co	IL	\$11,721,421	0.16%
65935	Massachusetts Mut Life Ins Co	MA	\$356,470,276	4.76%	65315	Liberty Life Assur Co Of Boston	MA	\$11,629,331	0.16%
80942	ING USA Ann & Life Ins Co	IA	\$340,175,187	4.54%	60142	TIAA Cref Life Ins Co	NY	\$10,144,704	0.14%
65676	Lincoln Natl Life Ins Co	IN	\$336,806,506	4.49%	68608	Symetra Life Ins Co	WA	\$9,700,347	0.13%
65005	RiverSource Life Ins Co	MN	\$321,794,884	4.29%	91413	Western Reserve Life Assur Co of OH	OH	\$9,214,375	0.12%
62944	AXA Equitable Life Ins Co	NY	\$293,535,295	3.92%	68241	Prudential Ins Co Of Amer	NJ	\$9,040,532	0.12%
65056	Jackson Natl Life Ins Co	MI	\$238,920,198	3.19%	68136	Protective Life Ins Co	TN	\$8,907,416	0.12%
61050	MetLife Investors USA Ins Co	DE	\$232,150,334	3.10%	64513	Horace Mann Life Ins Co	IL	\$7,815,383	0.10%
65978	Metropolitan Life Ins Co	NY	\$215,686,963	2.88%	93661	Annuity Investors Life Ins Co	OH	\$7,261,151	0.10%
79065	Sun Life Assur Co Of Canada US	DE	\$206,539,490	2.76%	69868	United Of Omaha Life Ins Co	NE	\$6,994,552	0.09%
93696	Fidelity Investments Life Ins Co	UT	\$190,744,666	2.55%	61999	Americo Fin Life & Ann Ins Co	TX	\$6,335,030	0.08%
90611	Allianz Life Ins Co Of N Amer	MN	\$182,765,550	2.44%	66168	Minnesota Life Ins Co	MN	\$6,283,198	0.08%
61271	Principal Life Ins Co	IA	\$163,279,417	2.18%	64017	Jefferson Natl Life Ins Co	TX	\$5,905,235	0.08%
87726	MetLife Ins Co of CT	CT	\$157,885,354	2.11%	91642	Forethought Life Ins Co	IN	\$5,236,537	0.07%
67466	Pacific Life Ins Co	NE	\$150,828,297	2.01%	68810	Sentry Life Ins Co	WI	\$4,835,926	0.06%
91626	New England Life Ins Co	MA	\$148,408,343	1.98%	63932	Aviva Life & Ann Co of NY	NY	\$4,733,566	0.06%
60631	American Investors Life Ins Co	KS	\$127,929,396	1.71%	67105	Reliastar Life Ins Co	MN	\$4,392,921	0.06%
70432	AIG Ann Ins Co	TX	\$112,312,172	1.50%	61301	Ameritas Life Ins Corp	NE	\$4,127,921	0.06%
86630	Prudential Ann Life Assur Corp	CT	\$101,896,673	1.36%	65242	Lafayette Life Ins Co	IN	\$3,887,654	0.05%
70688	Transamerica Financial Life Ins Co	NY	\$99,633,098	1.33%	63126	Farm Family Life Ins Co	NY	\$3,365,861	0.04%
68322	Great W Life & Ann Ins Co	CO	\$93,821,179	1.25%	61492	Liberty Life Ins Co	SC	\$3,162,973	0.04%
65536	Genworth Life & Ann Ins Co	VA	\$82,042,583	1.09%	90557	Kemper Investors Life Ins Co	IL	\$2,938,490	0.04%
60739	American Natl Ins Co	TX	\$63,647,128	0.85%	70335	West Coast Life Ins Co	NE	\$2,765,744	0.04%
93432	CM Life Ins Co	CT	\$62,929,565	0.84%	65722	Loyal Amer Life Ins Co	OH	\$2,375,174	0.03%
60941	AIG SunAmerica Life Assur Co	AZ	\$61,377,642	0.82%	67644	Penn Mut Life Ins Co	PA	\$2,210,394	0.03%
70238	Variable Annuity Life Ins Co	TX	\$57,013,485	0.76%	64246	Guardian Life Ins Co Of Amer	NY	\$2,151,126	0.03%
86231	Transamerica Life Ins Co	IA	\$54,324,519	0.73%	66915	New York Life Ins Co	NY	\$1,787,890	0.02%
65099	John Hancock Life Ins Co	MA	\$43,072,895	0.57%	62057	Lincoln Life & Ann Co of NY	NY	\$1,783,786	0.02%
79227	Pruco Life Ins Co	AZ	\$42,640,713	0.57%	66842	AIG Life Ins Co	DE	\$1,781,159	0.02%
66974	North Amer Co Life & Hlth Ins	IA	\$40,238,180	0.54%	60232	AGL Life Assur Co	PA	\$1,708,913	0.02%
62510	Equitrust Life Ins Co	IA	\$38,936,192	0.52%	71153	Hartford Life & Ann Ins Co	CT	\$1,639,244	0.02%
61263	Bankers Life & Cas Co	IL	\$38,223,085	0.51%	72222	Amica Life Ins Co	RI	\$1,623,914	0.02%
78778	Guardian Ins & Ann Co Inc	DE	\$37,778,748	0.50%	84824	Commonwealth Ann & Life Ins Co	MA	\$1,445,693	0.02%
60488	American Gen Life Ins Co	TX	\$37,727,622	0.50%	68039	Presidential Life Ins Co	NY	\$1,417,148	0.02%
67172	Ohio Natl Life Ins Co	OH	\$36,596,790	0.49%	92916	United American Ins Co	NE	\$1,372,210	0.02%
66044	Midland Natl Life Ins Co	IA	\$32,858,394	0.44%	92622	Western Southern Life Assur Co	OH	\$1,174,758	0.02%
92738	American Equity Invest Life Ins Co	IA	\$30,892,341	0.41%	64327	Harleysville Life Ins Co	PA	\$1,087,161	0.01%
60895	American United Life Ins Co	IN	\$30,756,606	0.41%	66850	National Western Life Ins Co	CO	\$1,057,393	0.01%
67091	Northwestern Mut Life Ins Co	WI	\$29,365,733	0.39%	78077	Mony Life Ins Co Of Amer	AZ	\$931,153	0.01%
70025	Genworth Life Ins Co	DE	\$28,229,766	0.38%	66680	National Life Ins Co	VT	\$922,101	0.01%
93513	MetLife Investors Ins Co	MO	\$26,559,273	0.35%	68772	Security Mut Life Ins Co Of NY	NY	\$885,672	0.01%
70435	The Savings Bank Life Ins Co Of MA	MA	\$23,408,172	0.31%	63665	General Amer Life Ins Co	MO	\$635,481	0.01%
63312	Great Amer Life Ins Co	OH	\$23,399,269	0.31%	60682	Conseco Ins Co	IL	\$557,079	0.01%
60186	Allstate Life Ins Co	IL	\$23,134,820	0.31%	69051	Standard Life Ins Co Of IN	IN	\$515,267	0.01%
63274	OM Fin Life Ins Co	MD	\$21,352,014	0.28%	67814	Phoenix Life Ins Co	NY	\$469,986	0.01%
79022	Merrill Lynch Life Ins Co	AR	\$18,513,471	0.25%	69140	First Allamerica Fin Life Ins Co	MA	\$430,476	0.01%
69663	USAA Life Ins Co	TX	\$18,039,591	0.24%	93629	Prudential Retirement Ins & Anuty Co	CT	\$253,174	0.00%
71129	Fort Dearborn Life Ins Co	IL	\$16,274,962	0.22%	62345	Berkshire Hathaway Life Ins Co NE	NE	\$229,844	0.00%
65595	Lincoln Benefit Life Co	NE	\$16,111,693	0.22%	97268	Pacific Life & Ann Co	AZ	\$212,843	0.00%
80837	Union Central Life Ins Co	OH	\$15,950,809	0.21%	65838	John Hancock Life Ins Co (USA)	MI	\$208,859	0.00%
93548	PHL Variable Ins Co	CT	\$15,939,288	0.21%	69256	Sunamerica Life Ins Co	AZ	\$170,028	0.00%
60054	Aetna Life Ins Co	CT	\$15,797,180	0.21%	63967	Government Personnel Mut Life Ins Co	TX	\$152,274	0.00%
88072	Hartford Life Ins Co	CT	\$15,240,504	0.20%	99937	Columbus Life Ins Co	OH	\$145,577	0.00%
65528	Life Ins Co Of The Southwest	TX	\$15,114,130	0.20%	70408	Union Security Ins Co	IA	\$139,306	0.00%
68675	Security Benefit Life Ins Co	KS	\$14,801,840	0.20%	64939	Investors Ins Corp	DE	\$126,320	0.00%
69019	Standard Ins Co	OR	\$14,549,909	0.19%	71439	Assurity Life Ins Co	NE	\$110,000	0.00%
66869	Nationwide Life Ins Co	OH	\$14,456,853	0.19%	71870	Fidelity Security Life Ins Co	MO	\$98,900	0.00%

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
60038	Acacia Life Ins Co	DC	\$95,286	0.00%	65080	John Alden Life Ins Co	WI	\$240	0.00%
63495	First Investors Life Ins Co	NY	\$88,527	0.00%	70130	Universal Guaranty Life Ins Co	OH	\$160	0.00%
68632	VantisLife Ins Co	CT	\$70,058	0.00%	65927	Lincoln Heritage Life Ins Co	IL	\$153	0.00%
70319	Washington Natl Ins Co	IL	\$69,856	0.00%	61832	Chesapeake Life Ins Co	OK	\$130	0.00%
66427	MTL Ins Co	IL	\$68,089	0.00%	69566	Trans World Assur Co	CA	\$120	0.00%
61360	Reliastar Life Ins Co Of NY	NY	\$67,099	0.00%	76325	Senior Hlth Ins Co of PA	PA	\$59	0.00%
65129	Kansas City Life Ins Co	MO	\$66,619	0.00%	67083	Manhattan Natl Life Ins Co	IL	\$15	0.00%
70580	Humanadental Ins Co	WI	\$63,604	0.00%					
60445	Sagicor Life Ins Co	TX	\$56,250	0.00%	Total Direct Written Premium				\$7,492,918,055 100.00%
70114	Unity Mut Life Ins Co	NY	\$53,658	0.00%					
62308	Connecticut Gen Life Ins Co	CT	\$44,042	0.00%					
60429	American Fidelity Life Ins Co	FL	\$35,772	0.00%					
62286	Golden Rule Ins Co	IN	\$35,000	0.00%					
65900	Conseco Life Ins Co	IN	\$31,621	0.00%					
80659	US Business of Canada Life Assur Co	MI	\$31,482	0.00%					
60607	American Intl Life Assur Co of NY	NY	\$31,173	0.00%					
84786	Colorado Bankers Life Ins Co	CO	\$30,311	0.00%					
66087	Mid West Natl Life Ins Co Of TN	TX	\$28,261	0.00%					
60704	Wilton Reassurance Life Co of NY	NY	\$27,093	0.00%					
65781	Madison Natl Life Ins Co Inc	WI	\$25,903	0.00%					
65919	Primerica Life Ins Co	MA	\$24,709	0.00%					
62103	Columbian Mut Life Ins Co	NY	\$22,462	0.00%					
61808	Charter Natl Life Ins Co	IL	\$21,550	0.00%					
70750	Nationwide Life & Ann Co of Amer	DE	\$20,235	0.00%					
67989	American Memorial Life Ins Co	SD	\$15,620	0.00%					
64505	Homesteaders Life Co	IA	\$15,410	0.00%					
71773	American Natl Life Ins Co Of TX	TX	\$13,976	0.00%					
81060	Canada Life Ins Co Of Amer	MI	\$13,001	0.00%					
70211	Reassure Amer Life Ins Co	IN	\$12,347	0.00%					
84654	US Branch Assumption Mut Life Ins Co	MA	\$12,088	0.00%					
81213	American Maturity Life Ins Co	CT	\$11,703	0.00%					
68225	Nationwide Life Ins Co of Amer	PA	\$9,628	0.00%					
62235	Unum Life Ins Co Of Amer	ME	\$9,524	0.00%					
62928	EMC Natl Life Co	IA	\$8,371	0.00%					
64580	Illinois Mut Life Ins Co	IL	\$8,106	0.00%					
61883	Central United Life Ins Co	AR	\$7,886	0.00%					
97136	Metropolitan Tower Life Ins Co	DE	\$6,200	0.00%					
62413	Continental Assur Co	IL	\$6,000	0.00%					
97055	Mega Life & Hlth Ins Co The	OK	\$5,935	0.00%					
63177	Farmers New World Life Ins Co	WA	\$5,792	0.00%					
67148	Occidental Life Ins Co Of NC	TX	\$5,319	0.00%					
63487	Investors Life Ins Co N Amer	TX	\$4,579	0.00%					
60275	American Bankers Life Assur Co Of FL	FL	\$3,041	0.00%					
66583	National Guardian Life Ins Co	WI	\$2,622	0.00%					
61395	Beneficial Life Ins Co	UT	\$2,400	0.00%					
66672	American Gen Life & Acc Ins Co	TN	\$2,207	0.00%					
64211	Guarantee Trust Life Ins Co	IL	\$2,192	0.00%					
61425	Trustmark Ins Co	IL	\$2,100	0.00%					
87645	United Fidelity Life Ins Co	TX	\$1,766	0.00%					
94099	United Investors Life Ins Co	MO	\$1,580	0.00%					
90212	Great Southern Life Ins Co	TX	\$1,555	0.00%					
70866	Allstate Assur Co	IL	\$1,500	0.00%					
60534	American Heritage Life Ins Co	FL	\$1,200	0.00%					
63258	Federated Life Ins Co	MN	\$1,050	0.00%					
71404	Continental Gen Ins Co	OH	\$1,000	0.00%					
62049	Colonial Life & Accident Ins Co	SC	\$921	0.00%					
70106	United States Life Ins Co In NYC	NY	\$673	0.00%					
80624	American Progressive L&H Ins Of NY	NY	\$400	0.00%					
69116	State Life Ins Co	IN	\$300	0.00%					
61476	Boston Mut Life Ins Co	MA	\$251	0.00%					



## 2008 Premium and Market Share - BOILER &amp; MACHINERY

			Premium Written in MA as of	Market Share in MA as of				Premium Written in MA as of	Market Share in MA as of	
NAIC #	Company Name	State	12/31/2008	12/31/2008	NAIC #	Company Name	State	12/31/2008	12/31/2008	
21482	Factory Mut Ins Co	RI	\$5,780,957	22.30%	39306	Fidelity & Deposit Co Of MD	MD	\$16,419	0.06%	
20281	Federal Ins Co	IN	\$2,996,550	11.56%	40142	American Zurich Ins Co	IL	\$16,044	0.06%	
11452	Hartford Steam Boil Inspec & Ins Co	CT	\$2,466,584	9.52%	23108	Lumbermens Underwriting Alliance	MO	\$13,852	0.05%	
20443	Continental Cas Co	IL	\$1,652,914	6.38%	22667	Ace Amer Ins Co	PA	\$13,514	0.05%	
25674	Travelers Property Cas Co Of Amer	CT	\$1,325,833	5.11%	21857	American Ins Co	OH	\$9,849	0.04%	
19445	National Union Fire Ins Co Of Pitts	PA	\$1,219,021	4.70%	24775	St Paul Guardian Ins Co	MN	\$9,081	0.04%	
41181	Universal Underwriters Ins Co	KS	\$942,253	3.64%	37052	Regis Ins Co	PA	\$8,340	0.03%	
10014	Affiliated Fm Ins Co	RI	\$920,075	3.55%	21784	Firemens Ins Co Of Washington DC	DE	\$7,958	0.03%	
16535	Zurich American Ins Co	NY	\$826,920	3.19%	22322	Greenwich Ins Co	DE	\$7,586	0.03%	
26247	American Guar & Liab Ins	NY	\$718,735	2.77%	37540	Beazley Ins Co Inc	CT	\$7,017	0.03%	
25623	Phoenix Ins Co	CT	\$549,611	2.12%	23043	Liberty Mut Ins Co	MA	\$6,673	0.03%	
25658	Travelers Ind Co	CT	\$424,606	1.64%	20370	AXIS Reins Co	NY	\$4,627	0.02%	
24767	St Paul Fire & Marine Ins Co	MN	\$385,023	1.49%	27740	North Pointe Ins Co	MI	\$4,090	0.02%	
20397	Vigilant Ins Co	NY	\$359,387	1.39%	20478	National Fire Ins Co Of Hartford	IL	\$4,064	0.02%	
23841	New Hampshire Ins Co	PA	\$312,312	1.20%	20508	Valley Forge Ins Co	PA	\$3,823	0.01%	
20621	OneBeacon Amer Ins Co	MA	\$307,814	1.19%	22306	Massachusetts Bay Ins Co	NH	\$3,664	0.01%	
20303	Great Northern Ins Co	IN	\$302,072	1.17%	20702	Ace Fire Underwriters Ins Co	PA	\$2,967	0.01%	
20230	Central Mut Ins Co	OH	\$295,734	1.14%	11991	National Cas Co	WI	\$2,061	0.01%	
35300	Allianz Global Risks US Ins Co	CA	\$292,925	1.13%	29459	Twin City Fire Ins Co Co	IN	\$1,784	0.01%	
19259	Selective Ins Co Of SC	IN	\$225,936	0.87%	10677	Cincinnati Ins Co	OH	\$1,626	0.01%	
20222	All Amer Ins Co	OH	\$225,486	0.87%	10340	Stonington Ins Co	TX	\$1,326	0.01%	
19402	AIG Cas Co	PA	\$217,103	0.84%	19704	American States Ins Co	IN	\$1,306	0.01%	
25682	Travelers Ind Co Of CT	CT	\$203,477	0.78%	24732	General Ins Co Of Amer	WA	\$1,164	0.00%	
39845	Westport Ins Corp	MO	\$188,071	0.73%	19690	American Economy Ins Co	IN	\$805	0.00%	
14974	Pennsylvania Lumbermens Mut Ins	PA	\$175,728	0.68%	10499	DaimlerChrysler Ins Co	MI	\$755	0.00%	
21881	National Surety Corp	IL	\$158,735	0.61%	35289	Continental Ins Co	PA	\$539	0.00%	
19429	Insurance Co Of The State Of PA	PA	\$155,408	0.60%	20427	American Cas Co Of Reading PA	PA	\$456	0.00%	
10069	Housing Authority Prop A Mut Co	VT	\$148,794	0.57%	24198	Peerless Ins Co	NH	\$285	0.00%	
20648	Employers Fire Ins Co	MA	\$142,882	0.55%	24724	First Natl Ins Co Of Amer	WA	\$265	0.00%	
23809	Granite State Ins Co	PA	\$130,523	0.50%	24074	Ohio Cas Ins Co	OH	\$26	0.00%	
24554	XL Ins Amer Inc	DE	\$122,311	0.47%	10936	Seneca Ins Co Inc	NY	\$7	0.00%	
12904	Tokio Marine & Nichido Fire Ins Co	NY	\$115,816	0.45%	Total Direct Written Premium				\$25,921,399	100.00%
22136	Great Amer Ins Co of NY	NY	\$113,653	0.44%						
19682	Hartford Fire In Co	CT	\$107,284	0.41%						
25615	Charter Oak Fire Ins Co	CT	\$103,519	0.40%						
22292	Hanover Ins Co	NH	\$90,335	0.35%						
25844	Union Ins Co	IA	\$86,816	0.33%						
13935	Federated Mut Ins Co	MN	\$86,616	0.33%						
14982	Penn Millers Ins Co	PA	\$84,808	0.33%						
21415	Employers Mut Cas Co	IA	\$64,515	0.25%						
31325	Acadia Ins Co	NH	\$64,064	0.25%						
10815	Verlan Fire Ins Co MD	MD	\$63,603	0.25%						
26344	Great Amer Assur Co	OH	\$59,894	0.23%						
20346	Pacific Ind Co	WI	\$58,947	0.23%						
25666	Travelers Ind Co Of Amer	CT	\$58,450	0.23%						
37273	Axis Ins Co	IL	\$42,259	0.16%						
24791	St Paul Mercury Ins Co	MN	\$42,130	0.16%						
31534	Citizens Ins Co Of Amer	MI	\$38,067	0.15%						
11126	Sompo Japan Ins Co of Amer	NY	\$34,139	0.13%						
16691	Great Amer Ins Co	OH	\$33,776	0.13%						
37257	Praetorian Ins Co	IL	\$29,374	0.11%						
39926	Selective Ins Co Of The Southeast	IN	\$25,857	0.10%						
15067	Quincy Mut Fire Ins Co	MA	\$25,207	0.10%						
10804	Continental Western Ins Co	IA	\$24,860	0.10%						
10205	Mountain Valley Ind Co	NH	\$24,169	0.09%						
13331	American Hardware Mut Ins Co	OH	\$23,987	0.09%						
21873	Firemans Fund Ins Co	CA	\$19,922	0.08%						
19380	American Home Assur Co	NY	\$19,075	0.07%						
26832	Great Amer Alliance Ins Co	OH	\$18,543	0.07%						
19224	St Paul Protective Ins Co	IL	\$18,385	0.07%						
13978	Florists Mut Ins Co	IL	\$17,576	0.07%						



## 2008 Premium and Market Share - BURGLARY &amp; THEFT

			Premium Written in MA as of	Market Share in MA as of				Premium Written in MA as of	Market Share in MA as of
NAIC #	Company Name	State	12/31/2008	12/31/2008	NAIC #	Company Name	State	12/31/2008	12/31/2008
31194	Travelers Cas & Surety Co Of Amer	CT	\$820,351	21.63%	20621	OneBeacon Amer Ins Co	MA	\$740	0.02%
20281	Federal Ins Co	IN	\$694,990	18.33%	24414	General Cas Co Of WI	WI	\$732	0.02%
19445	National Union Fire Ins Co Of Pitts	PA	\$399,104	10.52%	24198	Peerless Ins Co	NH	\$703	0.02%
29424	Hartford Cas Ins Co	IN	\$257,412	6.79%	31534	Citizens Ins Co Of Amer	MI	\$693	0.02%
29459	Twin City Fire Ins Co Co	IN	\$169,488	4.47%	36463	Discover Prop & Cas Ins Co	IL	\$641	0.02%
24767	St Paul Fire & Marine Ins Co	MN	\$163,838	4.32%	39926	Selective Ins Co Of The Southeast	IN	\$639	0.02%
26182	Harleysville Worcester Ins Co	PA	\$145,139	3.83%	20494	Transportation Ins Co	IL	\$498	0.01%
41181	Universal Underwriters Ins Co	KS	\$133,672	3.52%	26522	Mount Vernon Fire Ins Co	PA	\$389	0.01%
21121	Westchester Fire Ins Co	NY	\$101,059	2.66%	25658	Travelers Ind Co	CT	\$361	0.01%
22292	Hanover Ins Co	NH	\$100,956	2.66%	21857	American Ins Co	OH	\$347	0.01%
19917	Liberty Ins Underwriters Inc	NY	\$92,828	2.45%	26247	American Guar & Liab Ins	NY	\$311	0.01%
20346	Pacific Ind Co	WI	\$92,815	2.45%	40142	American Zurich Ins Co	IL	\$281	0.01%
37273	Axis Ins Co	IL	\$76,674	2.02%	25984	Graphic Arts Mut Ins Co	NY	\$226	0.01%
16535	Zurich American Ins Co	NY	\$65,168	1.72%	25666	Travelers Ind Co Of Amer	CT	\$191	0.01%
20303	Great Northern Ins Co	IN	\$49,888	1.32%	25674	Travelers Property Cas Co Of Amer	CT	\$181	0.00%
25224	Great Divide Ins Co	ND	\$49,321	1.30%	19690	American Economy Ins Co	IN	\$150	0.00%
29580	Berkley Regional Ins Co	DE	\$39,923	1.05%	11045	Excelsior Ins Co	NH	\$148	0.00%
20443	Continental Cas Co	IL	\$36,534	0.96%	27073	Nipponkoa Ins Co Ltd US Br	NY	\$141	0.00%
24791	St Paul Mercury Ins Co	MN	\$35,164	0.93%	24775	St Paul Guardian Ins Co	MN	\$78	0.00%
39306	Fidelity & Deposit Co Of MD	MD	\$29,544	0.78%	20230	Central Mut Ins Co	OH	\$71	0.00%
35181	Executive Risk Ind Inc	DE	\$28,359	0.75%	18767	Church Mut Ins Co	WI	\$70	0.00%
20397	Vigilant Ins Co	NY	\$15,909	0.42%	12866	T.H.E. Ins Co	LA	\$53	0.00%
22306	Massachusetts Bay Ins Co	NH	\$13,098	0.35%	25623	Phoenix Ins Co	CT	\$53	0.00%
23043	Liberty Mut Ins Co	MA	\$12,626	0.33%	20427	American Cas Co Of Reading PA	PA	\$50	0.00%
24554	XL Ins Amer Inc	DE	\$12,353	0.33%	37257	Praetorian Ins Co	IL	\$4	0.00%
19682	Hartford Fire In Co	CT	\$11,304	0.30%	Total Direct Written Premium\$3,792,507100.00%				
21180	Sentry Select Ins Co	WI	\$10,182	0.27%					
26344	Great Amer Assur Co	OH	\$10,114	0.27%					
12904	Tokio Marine & Nichido Fire Ins Co	NY	\$9,805	0.26%					
42404	Liberty Ins Corp	IL	\$9,263	0.24%					
13935	Federated Mut Ins Co	MN	\$8,889	0.23%					
18058	Philadelphia Ind Ins Co	PA	\$8,064	0.21%					
16691	Great Amer Ins Co	OH	\$6,430	0.17%					
24988	Sentry Ins A Mut Co	WI	\$4,889	0.13%					
26433	Harco Natl Ins Co	IL	\$4,435	0.12%					
15024	Preferred Mut Ins Co	NY	\$4,133	0.11%					
29874	North Amer Specialty Ins Co	NH	\$3,785	0.10%					
21326	Empire Fire & Marine Ins Co	NE	\$3,684	0.10%					
13331	American Hardware Mut Ins Co	OH	\$3,669	0.10%					
22136	Great Amer Ins Co of NY	NY	\$3,578	0.09%					
33588	First Liberty Ins Corp	IA	\$3,552	0.09%					
19259	Selective Ins Co Of SC	IN	\$3,544	0.09%					
25615	Charter Oak Fire Ins Co	CT	\$3,282	0.09%					
41483	Farmington Cas Co	CT	\$3,200	0.08%					
14982	Penn Millers Ins Co	PA	\$3,102	0.08%					
10205	Mountain Valley Ind Co	NH	\$3,085	0.08%					
23035	Liberty Mut Fire Ins Co	WI	\$2,944	0.08%					
25976	Utica Mut Ins Co	NY	\$2,382	0.06%					
19038	Travelers Cas & Surety Co	CT	\$2,321	0.06%					
20370	AXIS Reins Co	NY	\$2,057	0.05%					
27740	North Pointe Ins Co	MI	\$2,057	0.05%					
24449	Regent Ins Co	WI	\$1,953	0.05%					
25682	Travelers Ind Co Of CT	CT	\$1,941	0.05%					
26832	Great Amer Alliance Ins Co	OH	\$1,685	0.04%					
20648	Employers Fire Ins Co	MA	\$1,586	0.04%					
14788	NGM Ins Co	FL	\$1,521	0.04%					
10677	Cincinnati Ins Co	OH	\$1,509	0.04%					
21415	Employers Mut Cas Co	IA	\$1,410	0.04%					
21458	Employers Ins of Wausau	WI	\$1,219	0.03%					
31325	Acadia Ins Co	NH	\$1,210	0.03%					
14974	Pennsylvania Lumbermens Mut Ins	PA	\$759	0.02%					

## 2008 Premium and Market Share: COMMERCIAL AUTO

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
34754	Commerce Ins Co	MA	\$75,687,949	10.47%	13331	American Hardware Mut Ins Co	OH	\$2,071,379	0.29%
41360	Arbella Protection Ins Co	MA	\$62,650,045	8.67%	16691	Great Amer Ins Co	OH	\$1,956,449	0.27%
39454	Safety Ins Co	MA	\$48,367,275	6.69%	23043	Liberty Mut Ins Co	MA	\$1,942,171	0.27%
25615	Charter Oak Fire Ins Co	CT	\$36,331,165	5.03%	13935	Federated Mut Ins Co	MN	\$1,845,557	0.26%
21750	Pilgrim Ins Co	MA	\$35,313,685	4.89%	42404	Liberty Ins Corp	IL	\$1,790,058	0.25%
22292	Hanover Ins Co	NH	\$31,705,891	4.39%	20230	Central Mut Ins Co	OH	\$1,732,133	0.24%
33618	Safety Ind Ins Co	MA	\$27,440,904	3.80%	36463	Discover Prop & Cas Ins Co	IL	\$1,716,600	0.24%
20648	Employers Fire Ins Co	MA	\$22,613,230	3.13%	20508	Valley Forge Ins Co	PA	\$1,697,530	0.23%
18058	Philadelphia Ind Ins Co	PA	\$18,990,560	2.63%	26069	Wausau Business Ins Co	WI	\$1,689,467	0.23%
16535	Zurich American Ins Co	NY	\$13,939,015	1.93%	20443	Continental Cas Co	IL	\$1,588,021	0.22%
25658	Travelers Ind Co	CT	\$13,867,530	1.92%	21261	Electric Ins Co	MA	\$1,568,026	0.22%
19445	National Union Fire Ins Co Of Pitts	PA	\$12,925,290	1.79%	19356	Maryland Cas Co	MD	\$1,506,059	0.21%
31325	Acadia Ins Co	NH	\$12,733,619	1.76%	21180	Sentry Select Ins Co	WI	\$1,410,536	0.20%
40274	Citation Ins Co	MA	\$12,288,466	1.70%	12904	Tokio Marine & Nichido Fire Ins Co	NY	\$1,274,756	0.18%
19801	Argonaut Ins Co	IL	\$11,756,726	1.63%	26077	Lancer Ins Co	IL	\$1,266,640	0.18%
23035	Liberty Mut Fire Ins Co	WI	\$11,526,495	1.60%	10847	Cumis Ins Society Inc	IA	\$1,256,359	0.17%
10243	National Continental Ins Co	NY	\$10,909,973	1.51%	19429	Insurance Co Of The State Of PA	PA	\$1,196,026	0.17%
26182	Harleysville Worcester Ins Co	PA	\$10,652,030	1.47%	10804	Continental Western Ins Co	IA	\$1,176,963	0.16%
32620	National Interstate Ins Co	OH	\$10,145,858	1.40%	14206	Holyoke Mut Ins Co In Salem	MA	\$1,172,504	0.16%
14788	NGM Ins Co	FL	\$9,401,117	1.30%	10499	DaimlerChrysler Ins Co	MI	\$1,097,891	0.15%
25674	Travelers Property Cas Co Of Amer	CT	\$9,158,106	1.27%	11150	Arch Ins Co	MO	\$1,096,284	0.15%
41181	Universal Underwriters Ins Co	KS	\$8,572,119	1.19%	15067	Quincy Mut Fire Ins Co	MA	\$1,054,387	0.15%
25623	Phoenix Ins Co	CT	\$8,460,243	1.17%	35696	Harleysville Preferred Ins Co	PA	\$1,037,416	0.14%
25666	Travelers Ind Co Of Amer	CT	\$8,028,355	1.11%	26344	Great Amer Assur Co	OH	\$979,841	0.14%
19682	Hartford Fire In Co	CT	\$7,686,973	1.06%	44393	West American Ins Co	IN	\$944,365	0.13%
21326	Empire Fire & Marine Ins Co	NE	\$7,315,675	1.01%	24988	Sentry Ins A Mut Co	WI	\$931,642	0.13%
13803	Farm Family Cas Ins Co	NY	\$7,277,378	1.01%	14168	Harleysville Mut Ins Co	PA	\$876,208	0.12%
24198	Peerless Ins Co	NH	\$7,147,473	0.99%	26042	Wausau Underwriters Ins Co	WI	\$800,817	0.11%
31534	Citizens Ins Co Of Amer	MI	\$6,346,642	0.88%	21415	Employers Mut Cas Co	IA	\$770,816	0.11%
11045	Excelsior Ins Co	NH	\$6,287,370	0.87%	24074	Ohio Cas Ins Co	OH	\$757,756	0.10%
22306	Massachusetts Bay Ins Co	NH	\$5,963,000	0.83%	31348	Crum & Forster Ind Co	DE	\$724,908	0.10%
21172	Vanliner Ins Co	MO	\$5,249,049	0.73%	20222	All Amer Ins Co	OH	\$719,623	0.10%
24767	St Paul Fire & Marine Ins Co	MN	\$5,185,788	0.72%	33600	LM Ins Corp	IA	\$707,224	0.10%
20478	National Fire Ins Co Of Hartford	IL	\$5,032,661	0.70%	24066	American Fire & Cas Co	OH	\$700,306	0.10%
20494	Transportation Ins Co	IL	\$4,503,804	0.62%	24147	Old Republic Ins Co	PA	\$684,299	0.09%
25682	Travelers Ind Co Of CT	CT	\$4,418,846	0.61%	21105	North River Ins Co	NJ	\$654,469	0.09%
23841	New Hampshire Ins Co	PA	\$4,359,883	0.60%	20621	OneBeacon Amer Ins Co	MA	\$642,240	0.09%
29424	Hartford Cas Ins Co	IN	\$4,282,101	0.59%	19976	Amica Mut Ins Co	RI	\$621,689	0.09%
22667	Ace Amer Ins Co	PA	\$4,139,435	0.57%	23809	Granite State Ins Co	PA	\$576,163	0.08%
25976	Utica Mut Ins Co	NY	\$4,051,574	0.56%	10205	Mountain Valley Ind Co	NH	\$575,039	0.08%
19410	Commerce & Industry Ins Co	NY	\$3,910,417	0.54%	22012	Motors Ins Corp	MI	\$568,916	0.08%
21113	United States Fire Ins Co	DE	\$3,765,298	0.52%	19720	American Alt Ins Corp	DE	\$547,140	0.08%
25984	Graphic Arts Mut Ins Co	NY	\$3,764,438	0.52%	39926	Selective Ins Co Of The Southeast	IN	\$521,662	0.07%
23965	Norfolk & Dedham Mut Fire Ins Co	MA	\$3,648,534	0.50%	18767	Church Mut Ins Co	WI	\$483,786	0.07%
10120	Everest Natl Ins Co	DE	\$3,549,040	0.49%	11126	Sompo Japan Ins Co of Amer	NY	\$405,269	0.06%
25844	Union Ins Co	IA	\$3,519,124	0.49%	26433	Harco Natl Ins Co	IL	\$368,048	0.05%
21784	Firemens Ins Co Of Washington DC	DE	\$3,222,291	0.45%	33588	First Liberty Ins Corp	IA	\$340,224	0.05%
19259	Selective Ins Co Of SC	IN	\$3,097,313	0.43%	21458	Employers Ins of Wausau	WI	\$332,221	0.05%
19380	American Home Assur Co	NY	\$2,973,413	0.41%	20303	Great Northern Ins Co	IN	\$304,717	0.04%
11770	United Fndl Cas Co	OH	\$2,796,987	0.39%	21962	Pennsylvania Gen Ins Co	PA	\$287,505	0.04%
23329	Merchants Mut Ins Co	NY	\$2,543,168	0.35%	14737	Plymouth Rock Assur Corp	MA	\$235,895	0.03%
24171	Netherlands Ins Co The	NH	\$2,447,175	0.34%	21857	American Ins Co	OH	\$229,827	0.03%
10017	Arbella Ind Ins Co	MA	\$2,416,045	0.33%	19704	American States Ins Co	IN	\$226,684	0.03%
24260	Progressive Cas Ins Co	OH	\$2,344,922	0.32%	22322	Greenwich Ins Co	DE	\$215,978	0.03%
12475	Republic-Franklin Ins Co	OH	\$2,325,578	0.32%	24139	Old Republic Gen Ins Corp	IL	\$200,209	0.03%
20281	Federal Ins Co	IN	\$2,310,243	0.32%	20362	Mitsui Sumitomo Ins Co of Amer	NY	\$199,301	0.03%
24414	General Cas Co Of WI	WI	\$2,303,117	0.32%	12262	Pennsylvania Manufacturers Assoc Ins	PA	\$196,651	0.03%
29459	Twin City Fire Ins Co Co	IN	\$2,247,124	0.31%	21121	Westchester Fire Ins Co	NY	\$189,551	0.03%
41840	Allmerica Fin Benefit Ins Co	MI	\$2,200,946	0.30%	37885	XL Specialty Ins Co	DE	\$180,643	0.03%

Premium Written in MA as of 12/31/2008 Market Share in MA as of 12/31/2008					Premium Written in MA as of 12/31/2008 Market Share in MA as of 12/31/2008				
NAIC #	Company Name	State	12/31/2008	12/31/2008	NAIC #	Company Name	State	12/31/2008	12/31/2008
21881	National Surety Corp	IL	\$165,078	0.02%	37273	Axis Ins Co	IL	\$2,461	0.00%
22136	Great Amer Ins Co of NY	NY	\$154,444	0.02%	20613	Sparta Ins Co	MA	\$2,122	0.00%
11991	National Cas Co	WI	\$133,408	0.02%	23779	Nationwide Mut Fire Ins Co	OH	\$1,146	0.00%
19402	AIG Cas Co	PA	\$122,485	0.02%	24732	General Ins Co Of Amer	WA	\$1,080	0.00%
10677	Cincinnati Ins Co	OH	\$113,397	0.02%	12154	Encompass Ins Co of MA	MA	\$532	0.00%
12866	T.H.E. Ins Co	LA	\$107,232	0.01%	22357	Hartford Accident & Ind Co	CT	\$252	0.00%
25178	State Farm Mut Auto Ins Co	IL	\$93,185	0.01%	Total Direct Written Premium \$722,574,027 100.00%				
26247	American Guar & Liab Ins	NY	\$91,142	0.01%					
26832	Great Amer Alliance Ins Co	OH	\$87,427	0.01%					
25054	Hudson Ins Co	DE	\$60,514	0.01%					
37257	Praetorian Ins Co	IL	\$55,738	0.01%					
15032	Guideone Mut Ins Co	IA	\$52,550	0.01%					
40142	American Zurich Ins Co	IL	\$46,967	0.01%					
24449	Regent Ins Co	WI	\$45,887	0.01%					
19305	Assurance Co Of Amer	NY	\$44,059	0.01%					
21873	Firemans Fund Ins Co	CA	\$42,867	0.01%					
12831	State Natl Ins Co Inc	TX	\$42,692	0.01%					
18333	Peerless Ind Ins Co	IL	\$33,542	0.00%					
28460	Sentry Cas Co	WI	\$32,264	0.00%					
20427	American Cas Co Of Reading PA	PA	\$21,170	0.00%					
20702	Ace Fire Underwriters Ins Co	PA	\$18,733	0.00%					
13056	RLI Ins Co	IL	\$13,418	0.00%					
19372	Northern Ins Co Of NY	NY	\$11,737	0.00%					
20699	Ace Prop & Cas Ins Co	PA	\$9,171	0.00%					
25224	Great Divide Ins Co	ND	\$8,605	0.00%					
27073	Nipponkoa Ins Co Ltd US Br	NY	\$5,158	0.00%					
36684	Riverport Ins Co	MN	\$3,730	0.00%					
24554	XL Ins Amer Inc	DE	\$3,720	0.00%					
40827	Virginia Surety Co Inc	IL	\$2,799	0.00%					

## 2008 Premium and Market Share - COMMERCIAL MULTI-PERIL

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
18058	Philadelphia Ind Ins Co	PA	\$45,852,653	4.96%	20494	Transportation Ins Co	IL	\$3,479,535	0.38%
20648	Employers Fire Ins Co	MA	\$44,622,272	4.83%	24414	General Cas Co Of WI	WI	\$3,428,303	0.37%
20281	Federal Ins Co	IN	\$38,330,068	4.15%	23809	Granite State Ins Co	PA	\$3,374,131	0.36%
25674	Travelers Property Cas Co Of Amer	CT	\$35,576,585	3.85%	15040	Providence Mut Fire Ins Co	RI	\$3,373,067	0.36%
25615	Charter Oak Fire Ins Co	CT	\$28,594,771	3.09%	21857	American Ins Co	OH	\$3,342,477	0.36%
19682	Hartford Fire In Co	CT	\$26,542,191	2.87%	44393	West American Ins Co	IN	\$3,318,115	0.36%
25682	Travelers Ind Co Of CT	CT	\$25,408,149	2.75%	24074	Ohio Cas Ins Co	OH	\$3,238,773	0.35%
26182	Harleysville Worcester Ins Co	PA	\$24,167,186	2.61%	22357	Hartford Accident & Ind Co	CT	\$3,190,422	0.35%
14788	NGM Ins Co	FL	\$24,090,230	2.61%	37478	Hartford Ins Co Of The Midwest	IN	\$3,172,108	0.34%
26018	Vermont Mut Ins Co	VT	\$23,971,958	2.59%	21784	Firemens Ins Co Of Washington DC	DE	\$3,116,832	0.34%
23965	Norfolk & Dedham Mut Fire Ins Co	MA	\$23,118,185	2.50%	11024	Strathmore Ins Co	NY	\$3,113,219	0.34%
25666	Travelers Ind Co Of Amer	CT	\$20,803,206	2.25%	44300	Tower Ins Co Of NY	NY	\$3,053,919	0.33%
19798	Merrimack Mut Fire Ins Co	MA	\$20,569,605	2.22%	16535	Zurich American Ins Co	NY	\$3,017,287	0.33%
34754	Commerce Ins Co	MA	\$19,380,987	2.10%	21881	National Surety Corp	IL	\$2,814,154	0.30%
25658	Travelers Ind Co	CT	\$17,873,337	1.93%	20222	All Amer Ins Co	OH	\$2,781,784	0.30%
15067	Quincy Mut Fire Ins Co	MA	\$16,057,497	1.74%	14192	Hingham Mut Fire Ins Co	MA	\$2,691,858	0.29%
19356	Maryland Cas Co	MD	\$14,062,087	1.52%	43702	Tower National Ins Co	MA	\$2,655,458	0.29%
31534	Citizens Ins Co Of Amer	MI	\$14,003,504	1.51%	25976	Utica Mut Ins Co	NY	\$2,642,093	0.29%
25992	Northern Security Ins Co Inc	VT	\$13,875,889	1.50%	19305	Assurance Co Of Amer	NY	\$2,633,223	0.28%
31325	Acadia Ins Co	NH	\$13,771,943	1.49%	35696	Harleysville Preferred Ins Co	PA	\$2,545,287	0.28%
22306	Massachusetts Bay Ins Co	NH	\$13,761,857	1.49%	10936	Seneca Ins Co Inc	NY	\$2,506,151	0.27%
14532	Middlesex Mut Assur Co	CT	\$13,593,399	1.47%	23329	Merchants Mut Ins Co	NY	\$2,393,465	0.26%
25844	Union Ins Co	IA	\$13,155,530	1.42%	30104	Hartford Underwriters Ins Co	CT	\$2,271,051	0.25%
25623	Phoenix Ins Co	CT	\$12,525,102	1.35%	22136	Great Amer Ins Co of NY	NY	\$2,183,521	0.24%
22292	Hanover Ins Co	NH	\$12,100,013	1.31%	23841	New Hampshire Ins Co	PA	\$2,018,138	0.22%
39454	Safety Ins Co	MA	\$11,870,946	1.28%	19690	American Economy Ins Co	IN	\$1,876,350	0.20%
15059	Public Service Mut Ins Co	NY	\$11,356,028	1.23%	33618	Safety Ind Ins Co	MA	\$1,871,542	0.20%
20621	OneBeacon Amer Ins Co	MA	\$11,076,000	1.20%	26344	Great Amer Assur Co	OH	\$1,819,531	0.20%
21326	Empire Fire & Marine Ins Co	NE	\$10,734,150	1.16%	22195	Insurance Co Of Greater NY	NY	\$1,758,604	0.19%
24198	Peerless Ins Co	NH	\$10,672,014	1.15%	24066	American Fire & Cas Co	OH	\$1,686,029	0.18%
24171	Netherlands Ins Co The	NH	\$10,164,160	1.10%	40142	American Zurich Ins Co	IL	\$1,674,119	0.18%
29424	Hartford Cas Ins Co	IN	\$9,871,484	1.07%	38970	Markel Ins Co	IL	\$1,612,892	0.17%
10120	Everest Natl Ins Co	DE	\$9,397,722	1.02%	14826	New London Cnty Mut Ins Co	CT	\$1,612,860	0.17%
39217	QBE Ins Corp	PA	\$8,572,111	0.93%	23175	Phenix Mut Fire Ins Co	NH	\$1,540,937	0.17%
41360	Arbella Protection Ins Co	MA	\$8,418,402	0.91%	29459	Twin City Fire Ins Co Co	IN	\$1,535,934	0.17%
20478	National Fire Ins Co Of Hartford	IL	\$8,261,106	0.89%	11126	Sompo Japan Ins Co of Amer	NY	\$1,464,274	0.16%
20508	Valley Forge Ins Co	PA	\$8,109,877	0.88%	14982	Penn Millers Ins Co	PA	\$1,411,056	0.15%
22187	Greater NY Mut Ins Co	NY	\$7,786,992	0.84%	23043	Liberty Mut Ins Co	MA	\$1,399,028	0.15%
11045	Excelsior Ins Co	NH	\$7,665,911	0.83%	19801	Argonaut Ins Co	IL	\$1,367,053	0.15%
20303	Great Northern Ins Co	IN	\$6,957,378	0.75%	19372	Northern Ins Co Of NY	NY	\$1,160,070	0.13%
20397	Vigilant Ins Co	NY	\$6,878,968	0.74%	13978	Florists Mut Ins Co	IL	\$1,087,925	0.12%
14206	Holyoke Mut Ins Co In Salem	MA	\$6,748,754	0.73%	10069	Housing Authority Prop A Mut Co	VT	\$1,074,271	0.12%
19046	Travelers Cas Ins Co Of Amer	CT	\$6,408,036	0.69%	10340	Stonington Ins Co	TX	\$1,034,032	0.11%
20427	American Cas Co Of Reading PA	PA	\$6,321,297	0.68%	10847	Cumis Ins Society Inc	IA	\$1,018,878	0.11%
22667	Ace Amer Ins Co	PA	\$6,280,362	0.68%	20346	Pacific Ind Co	WI	\$1,005,291	0.11%
25860	Union Mut Fire Ins Co	VT	\$5,500,142	0.59%	34690	Property & Cas Ins Co Of Hartford	IN	\$992,526	0.11%
18333	Peerless Ind Ins Co	IL	\$5,277,242	0.57%	37257	Praetorian Ins Co	IL	\$989,426	0.11%
20230	Central Mut Ins Co	OH	\$5,273,559	0.57%	26069	Wausau Business Ins Co	WI	\$984,224	0.11%
14923	Patrons Mut Ins Co Of Ct	CT	\$5,105,705	0.55%	24449	Regent Ins Co	WI	\$958,194	0.10%
20443	Continental Cas Co	IL	\$4,991,870	0.54%	13935	Federated Mut Ins Co	MN	\$911,356	0.10%
12475	Republic-Franklin Ins Co	OH	\$4,862,909	0.53%	24767	St Paul Fire & Marine Ins Co	MN	\$857,613	0.09%
25984	Graphic Arts Mut Ins Co	NY	\$4,516,049	0.49%	21458	Employers Ins of Wausau	WI	\$803,577	0.09%
10804	Continental Western Ins Co	IA	\$4,501,561	0.49%	10205	Mountain Valley Ind Co	NH	\$783,013	0.08%
19771	Cambridge Mut Fire Ins Co	MA	\$4,300,466	0.47%	19704	American States Ins Co	IN	\$731,923	0.08%
15024	Preferred Mut Ins Co	NY	\$4,273,971	0.46%	39306	Fidelity & Deposit Co Of MD	MD	\$710,783	0.08%
18767	Church Mut Ins Co	WI	\$4,055,755	0.44%	13331	American Hardware Mut Ins Co	OH	\$698,941	0.08%
12831	State Natl Ins Co Inc	TX	\$3,833,937	0.41%	19720	American Alt Ins Corp	DE	\$680,010	0.07%
13803	Farm Family Cas Ins Co	NY	\$3,825,345	0.41%	39845	Westport Ins Corp	MO	\$676,721	0.07%
35289	Continental Ins Co	PA	\$3,771,469	0.41%	13714	Pharmacists Mut Ins Co	IA	\$647,772	0.07%
21873	Firemans Fund Ins Co	CA	\$3,755,266	0.41%	15032	Guideone Mut Ins Co	IA	\$631,985	0.07%

Premium Written in MA as of 12/31/2008Market Share in MA as of 12/31/2008					Premium Written in MA as of 12/31/2008Market Share in MA as of 12/31/2008				
NAIC #	Company Name	State	12/31/2008	12/31/2008	NAIC #	Company Name	State	12/31/2008	12/31/2008
14354	Jewelers Mut Ins Co	WI	\$628,125	0.07%	41335	United Natl Specialty Ins Co	WI	\$4,147	0.00%
23035	Liberty Mut Fire Ins Co	WI	\$621,445	0.07%	12262	Pennsylvania Manufacturers Assoc Ins	PA	\$4,107	0.00%
21865	Associated Ind Corp	CA	\$615,778	0.07%	34347	Colonial Amer Cas & Surety Co	MD	\$1,887	0.00%
16691	Great Amer Ins Co	OH	\$596,395	0.06%	24775	St Paul Guardian Ins Co	MN	\$1,247	0.00%
19259	Selective Ins Co Of SC	IN	\$586,399	0.06%	23817	Illinois Natl Ins Co	IL	\$1,156	0.00%
12901	Merchants Preferred Ins Co	NY	\$573,816	0.06%	21962	Pennsylvania Gen Ins Co	PA	\$1,041	0.00%
24732	General Ins Co Of Amer	WA	\$568,213	0.06%	21970	OneBeacon Ins Co	PA	\$536	0.00%
26832	Great Amer Alliance Ins Co	OH	\$544,905	0.06%	36064	Hanover Amer Ins Co	NH	\$510	0.00%
20362	Mitsui Sumitomo Ins Co of Amer	NY	\$517,557	0.06%	11452	Hartford Steam Boil Inspec & Ins Co	CT	\$290	0.00%
42404	Liberty Ins Corp	IL	\$505,243	0.05%	28932	Markel Amer Ins Co	VA	\$258	0.00%
21849	American Automobile Ins Co	MO	\$502,846	0.05%	23787	Nationwide Mut Ins Co	OH	\$171	0.00%
22551	Mitsui Sumitomo Ins USA Inc	NY	\$492,877	0.05%	33600	LM Ins Corp	IA	\$155	0.00%
26042	Wausau Underwriters Ins Co	WI	\$478,888	0.05%	12572	Selective Ins Co Of Amer	NJ	\$115	0.00%
33588	First Liberty Ins Corp	IA	\$429,923	0.05%	Total Direct Written Premium\$924,590,902100.00%				
21415	Employers Mut Cas Co	IA	\$428,691	0.05%					
24724	First Natl Ins Co Of Amer	WA	\$421,196	0.05%					
10014	Affiliated Fm Ins Co	RI	\$404,276	0.04%					
24740	Safeco Ins Co Of Amer	WA	\$388,678	0.04%					
20699	Ace Prop & Cas Ins Co	PA	\$373,068	0.04%					
25852	New England Guar Ins Co Inc	VT	\$333,827	0.04%					
26247	American Guar & Liab Ins	NY	\$301,971	0.03%					
19445	National Union Fire Ins Co Of Pitts	PA	\$276,492	0.03%					
11150	Arch Ins Co	MO	\$235,549	0.03%					
42048	Diamond State Ins Co	IN	\$223,922	0.02%					
12904	Tokio Marine & Nichido Fire Ins Co	NY	\$211,447	0.02%					
37052	Regis Ins Co	PA	\$196,694	0.02%					
23337	American European Ins Co	NH	\$186,547	0.02%					
43575	Indemnity Ins Co Of North Amer	PA	\$177,370	0.02%					
15679	National Fire & Ind Exch	MO	\$160,998	0.02%					
40045	Starnet Ins Co	DE	\$151,318	0.02%					
24031	Northland Cas Co	MN	\$141,669	0.02%					
21113	United States Fire Ins Co	DE	\$133,411	0.01%					
22322	Greenwich Ins Co	DE	\$131,677	0.01%					
11991	National Cas Co	WI	\$128,583	0.01%					
24988	Sentry Ins A Mut Co	WI	\$127,725	0.01%					
13056	RLI Ins Co	IL	\$127,515	0.01%					
10677	Cincinnati Ins Co	OH	\$118,430	0.01%					
19380	American Home Assur Co	NY	\$111,845	0.01%					
20702	Ace Fire Underwriters Ins Co	PA	\$103,914	0.01%					
19917	Liberty Ins Underwriters Inc	NY	\$100,798	0.01%					
39926	Selective Ins Co Of The Southeast	IN	\$88,561	0.01%					
21172	Vanliner Ins Co	MO	\$73,750	0.01%					
24791	St Paul Mercury Ins Co	MN	\$70,011	0.01%					
36463	Discover Prop & Cas Ins Co	IL	\$62,970	0.01%					
25143	State Farm Fire And Cas Co	IL	\$59,986	0.01%					
37710	First Amer Prop & Cas Ins Co	CA	\$45,690	0.00%					
21105	North River Ins Co	NJ	\$29,992	0.00%					
23396	Amerisure Mut Ins Co	MI	\$27,704	0.00%					
42307	Navigators Ins Co	NY	\$27,153	0.00%					
25224	Great Divide Ins Co	ND	\$24,474	0.00%					
42552	Nova Cas Co	NY	\$18,859	0.00%					
19488	Amerisure Ins Co	MI	\$17,476	0.00%					
19224	St Paul Protective Ins Co	IL	\$16,198	0.00%					
12154	Encompass Ins Co of MA	MA	\$14,093	0.00%					
18023	Star Ins Co	MI	\$10,085	0.00%					

## 2008 Premium and Market Share - CREDIT

	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
	20648	Employers Fire Ins Co	MA	\$6,558,550	21.06%
	12831	State Natl Ins Co Inc	TX	\$6,215,550	19.95%
	20516	Euler Hermes Amer Credit Ind Co	MD	\$4,843,595	15.55%
	31887	Coface N Amer Ins Co	MA	\$3,197,677	10.27%
	25422	Atradius Trade Credit Ins Co	MD	\$2,424,810	7.78%
	29980	First Colonial Ins Co	FL	\$2,179,108	7.00%
	16691	Great Amer Ins Co	OH	\$1,876,289	6.02%
	24813	Balboa Ins Co	CA	\$1,077,808	3.46%
	39217	OBE Ins Corp	PA	\$765,000	2.46%
	18538	Bancinsure Inc	OK	\$517,200	1.66%
	24147	Old Republic Ins Co	PA	\$279,078	0.90%
	22667	Ace Amer Ins Co	PA	\$260,889	0.84%
	37885	XL Specialty Ins Co	DE	\$236,330	0.76%
	16667	United Gty Residential Ins Co Of NC	NC	\$219,924	0.71%
	10952	Stonebridge Casualty Ins Co	OH	\$186,983	0.60%
	11150	Arch Ins Co	MO	\$156,100	0.50%
	25011	Wesco Ins Co	DE	\$96,331	0.31%
	29599	US Specialty Ins Co	TX	\$47,329	0.15%
	19445	National Union Fire Ins Co Of Pitts	PA	\$8,934	0.03%
	20443	Continental Cas Co	IL	\$561	0.00%
	30325	Zale Ind Co	TX	\$264	0.00%
	Total Direct Written Premium			\$31,148,310	100.00%

## 2008 Premium and Market Share - DEPOSIT FUNDS

			Premium Written in MA as of	Market Share in MA as of				Premium Written in MA as of	Market Share in MA as of
NAIC #	Company Name	State	12/31/2008	12/31/2008	NAIC #	Company Name	State	12/31/2008	12/31/2008
65056	Jackson Natl Life Ins Co	MI	\$845,251,385	28.86%	66427	MTL Ins Co	IL	\$224,649	0.01%
86231	Transamerica Life Ins Co	IA	\$723,371,135	24.70%	79022	Merrill Lynch Life Ins Co	AR	\$221,194	0.01%
68713	Security Life Of Denver Ins Co	CO	\$420,000,000	14.34%	65935	Massachusetts Mut Life Ins Co	MA	\$212,355	0.01%
61271	Principal Life Ins Co	IA	\$248,993,247	8.50%	64580	Illinois Mut Life Ins Co	IL	\$195,274	0.01%
80942	ING USA Ann & Life Ins Co	IA	\$173,700,000	5.93%	80837	Union Central Life Ins Co	OH	\$154,113	0.01%
65536	Genworth Life & Ann Ins Co	VA	\$89,045,068	3.04%	69663	USAA Life Ins Co	TX	\$150,000	0.01%
70025	Genworth Life Ins Co	DE	\$73,310,702	2.50%	86630	Prudential Ann Life Assur Corp	CT	\$120,906	0.00%
93629	Prudential Retirement Ins & Anuty Co	CT	\$49,406,922	1.69%	62235	Unum Life Ins Co Of Amer	ME	\$115,934	0.00%
65978	Metropolitan Life Ins Co	NY	\$46,585,313	1.59%	94099	United Investors Life Ins Co	MO	\$95,796	0.00%
66281	Monumental Life Ins Co	IA	\$31,911,023	1.09%	71129	Fort Dearborn Life Ins Co	IL	\$93,138	0.00%
88072	Hartford Life Ins Co	CT	\$31,724,171	1.08%	64327	Harleysville Life Ins Co	PA	\$90,000	0.00%
69868	United Of Omaha Life Ins Co	NE	\$29,325,508	1.00%	67105	Reliastar Life Ins Co	MN	\$88,000	0.00%
63274	OM Fin Life Ins Co	MD	\$20,396,018	0.70%	62626	Cuna Mut Ins Society	IA	\$75,248	0.00%
67814	Phoenix Life Ins Co	NY	\$15,597,359	0.53%	65838	John Hancock Life Ins Co (USA)	MI	\$59,517	0.00%
60488	American Gen Life Ins Co	TX	\$14,429,545	0.49%	88668	Mutual Of Amer Life Ins Co	NY	\$56,567	0.00%
63932	Aviva Life & Ann Co of NY	NY	\$12,531,988	0.43%	79227	Pruco Life Ins Co	AZ	\$36,009	0.00%
70435	The Savings Bank Life Ins Co Of MA	MA	\$12,298,953	0.42%	80985	BCS Life Ins Co	IL	\$35,136	0.00%
86509	Ing Life Ins & Ann Co	CT	\$9,831,533	0.34%	66680	National Life Ins Co	VT	\$34,676	0.00%
91596	New York Life Ins & Ann Corp	DE	\$8,629,266	0.29%	67172	Ohio Natl Life Ins Co	OH	\$31,720	0.00%
69345	Teachers Ins & Ann Assoc Of Amer	NY	\$7,706,591	0.26%	61492	Liberty Life Ins Co	SC	\$24,044	0.00%
69051	Standard Life Ins Co Of IN	IN	\$7,544,807	0.26%	62928	EMC Natl Life Co	IA	\$4,834	0.00%
61689	Aviva Life & Ann Co	IA	\$5,512,635	0.19%	71439	Assurity Life Ins Co	NE	\$3,505	0.00%
68241	Prudential Ins Co Of Amer	NJ	\$4,250,459	0.15%	67180	Ohio State Life Ins Co	TX	\$2,501	0.00%
62510	Equitrust Life Ins Co	IA	\$4,052,560	0.14%	67598	Paul Revere Life Ins Co	MA	\$2,427	0.00%
60054	Aetna Life Ins Co	CT	\$3,792,010	0.13%	61999	Americo Fin Life & Ann Ins Co	TX	\$1,717	0.00%
60631	American Investors Life Ins Co	KS	\$3,527,847	0.12%	63177	Farmers New World Life Ins Co	WA	\$1,663	0.00%
65005	RiverSource Life Ins Co	MN	\$3,004,878	0.10%	90212	Great Southern Life Ins Co	TX	\$608	0.00%
93696	Fidelity Investments Life Ins Co	UT	\$2,051,310	0.07%	91413	Western Reserve Life Assur Co of OH	OH	\$288	0.00%
65315	Liberty Life Assur Co Of Boston	MA	\$1,942,377	0.07%	60518	American Hlth & Life Ins Co	TX	\$240	0.00%
67644	Penn Mut Life Ins Co	PA	\$1,917,345	0.07%	87645	United Fidelity Life Ins Co	TX	\$188	0.00%
68136	Protective Life Ins Co	TN	\$1,899,094	0.06%	61832	Chesapeake Life Ins Co	OK	\$120	0.00%
63312	Great Amer Life Ins Co	OH	\$1,551,811	0.05%	84786	Colorado Bankers Life Ins Co	CO	\$120	0.00%
68608	Symetra Life Ins Co	WA	\$1,543,118	0.05%	97055	Mega Life & Hlth Ins Co The	OK	\$16	0.00%
63665	General Amer Life Ins Co	MO	\$1,458,340	0.05%	97764	Idealife Ins Co	CT	\$16	0.00%
68225	Nationwide Life Ins Co of Amer	PA	\$1,357,707	0.05%	Total Direct Written Premium\$2,928,905,294100.00%				
70432	AIG Ann Ins Co	TX	\$1,355,947	0.05%					
65595	Lincoln Benefit Life Co	NE	\$1,251,808	0.04%					
66168	Minnesota Life Ins Co	MN	\$1,242,046	0.04%					
60739	American Natl Ins Co	TX	\$1,236,803	0.04%					
63126	Farm Family Life Ins Co	NY	\$1,179,789	0.04%					
70335	West Coast Life Ins Co	NE	\$1,151,236	0.04%					
61050	MetLife Investors USA Ins Co	DE	\$1,079,642	0.04%					
68322	Great W Life & Ann Ins Co	CO	\$1,014,390	0.03%					
68772	Security Mut Life Ins Co Of NY	NY	\$691,532	0.02%					
66044	Midland Natl Life Ins Co	IA	\$667,928	0.02%					
69019	Standard Ins Co	OR	\$666,885	0.02%					
66974	North Amer Co Life & Hlth Ins	IA	\$597,095	0.02%					
67091	Northwestern Mut Life Ins Co	WI	\$567,245	0.02%					
61263	Bankers Life & Cas Co	IL	\$491,189	0.02%					
61301	Ameritas Life Ins Corp	NE	\$461,759	0.02%					
60038	Acacia Life Ins Co	DC	\$416,656	0.01%					
66842	AIG Life Ins Co	DE	\$398,620	0.01%					
93548	PHL Variable Ins Co	CT	\$379,007	0.01%					
65242	Lafayette Life Ins Co	IN	\$362,610	0.01%					
68039	Presidential Life Ins Co	NY	\$355,000	0.01%					
60142	TIAA Cref Life Ins Co	NY	\$327,838	0.01%					
67601	Paul Revere Variable Ann Ins Co	MA	\$313,202	0.01%					
72125	Physicians Life Ins Co	NE	\$310,965	0.01%					
90557	Kemper Investors Life Ins Co	IL	\$287,355	0.01%					
64246	Guardian Life Ins Co Of Amer	NY	\$281,495	0.01%					
80802	US Br SunLife Assur Co Of Canada	MI	\$232,708	0.01%					



## 2008 Premium and Market Share - FIDELITY &amp; SURETY

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
31194	Travelers Cas & Surety Co Of Amer	CT	\$22,809,594	15.50%	14494	Merchants Bonding Co a Mut	IA	\$120,042	0.08%
24740	Safeco Ins Co Of Amer	WA	\$19,225,424	13.07%	21970	OneBeacon Ins Co	PA	\$117,463	0.08%
13188	Western Surety Co	SD	\$12,966,754	8.81%	26565	Ohio Ind Co	OH	\$101,896	0.07%
20281	Federal Ins Co	IN	\$11,505,684	7.82%	37885	XL Specialty Ins Co	DE	\$94,355	0.06%
39306	Fidelity & Deposit Co Of MD	MD	\$9,170,202	6.23%	12572	Selective Ins Co Of Amer	NJ	\$86,382	0.06%
22292	Hanover Ins Co	NH	\$7,381,022	5.02%	19038	Travelers Cas & Surety Co	CT	\$80,685	0.05%
23043	Liberty Mut Ins Co	MA	\$5,686,490	3.87%	13935	Federated Mut Ins Co	MN	\$79,376	0.05%
29424	Hartford Cas Ins Co	IN	\$4,782,599	3.25%	20427	American Cas Co Of Reading PA	PA	\$78,939	0.05%
14788	NGM Ins Co	FL	\$4,427,116	3.01%	25658	Travelers Ind Co	CT	\$76,635	0.05%
21121	Westchester Fire Ins Co	NY	\$3,376,730	2.30%	24104	Ohio Farmers Ins Co	OH	\$72,677	0.05%
19445	National Union Fire Ins Co Of Pitts	PA	\$3,200,273	2.18%	21415	Employers Mut Cas Co	IA	\$71,191	0.05%
36226	United Cas & Surety Ins Co	MA	\$2,936,359	2.00%	37273	Axis Ins Co	IL	\$63,401	0.04%
19429	Insurance Co Of The State Of PA	PA	\$2,839,789	1.93%	21180	Sentry Select Ins Co	WI	\$50,106	0.03%
16691	Great Amer Ins Co	OH	\$2,794,235	1.90%	25054	Hudson Ins Co	DE	\$46,542	0.03%
19682	Hartford Fire In Co	CT	\$2,464,872	1.68%	18058	Philadelphia Ind Ins Co	PA	\$44,092	0.03%
29874	North Amer Specialty Ins Co	NH	\$2,213,131	1.50%	24066	American Fire & Cas Co	OH	\$43,085	0.03%
10847	Cumis Ins Society Inc	IA	\$1,871,980	1.27%	20648	Employers Fire Ins Co	MA	\$41,750	0.03%
11592	International Fidelity Ins Co	NJ	\$1,869,887	1.27%	19380	American Home Assur Co	NY	\$40,861	0.03%
24767	St Paul Fire & Marine Ins Co	MN	\$1,657,290	1.13%	20303	Great Northern Ins Co	IN	\$40,664	0.03%
20443	Continental Cas Co	IL	\$1,437,891	0.98%	20478	National Fire Ins Co Of Hartford	IL	\$40,442	0.03%
12750	Evergreen Natl Ind Co	OH	\$1,405,824	0.96%	15067	Quincy Mut Fire Ins Co	MA	\$37,641	0.03%
11150	Arch Ins Co	MO	\$1,391,607	0.95%	41483	Farmington Cas Co	CT	\$32,309	0.02%
32778	Washington Intl Ins Co	NH	\$1,272,634	0.87%	42307	Navigators Ins Co	NY	\$31,124	0.02%
24074	Ohio Cas Ins Co	OH	\$1,166,475	0.79%	12416	Protective Ins Co	IN	\$28,613	0.02%
24791	St Paul Mercury Ins Co	MN	\$1,113,886	0.76%	24147	Old Republic Ins Co	PA	\$26,438	0.02%
10656	United States Surety Co	MD	\$1,040,152	0.71%	35769	Lyndon Prop Ins Co	MO	\$26,300	0.02%
24724	First Natl Ins Co Of Amer	WA	\$971,397	0.66%	42404	Liberty Ins Corp	IL	\$25,867	0.02%
16535	Zurich American Ins Co	NY	\$900,603	0.61%	30562	American Manufacturers Mut Ins Co	IL	\$24,158	0.02%
22306	Massachusetts Bay Ins Co	NH	\$894,965	0.61%	36650	Guarantee Co Of N Amer USA	MI	\$23,628	0.02%
22950	Acstar Ins Co	IL	\$805,144	0.55%	26379	Accredited Surety & Cas Co Inc	FL	\$22,671	0.02%
35289	Continental Ins Co	PA	\$699,337	0.48%	23035	Liberty Mut Fire Ins Co	WI	\$22,587	0.02%
29459	Twin City Fire Ins Co Co	IN	\$566,280	0.38%	29599	US Specialty Ins Co	TX	\$21,208	0.01%
24260	Progressive Cas Ins Co	OH	\$544,505	0.37%	40142	American Zurich Ins Co	IL	\$20,305	0.01%
18619	Platte River Ins Co	NE	\$536,895	0.36%	22136	Great Amer Ins Co of NY	NY	\$19,288	0.01%
27081	Bond Safeguard Ins Co	IL	\$485,971	0.33%	21105	North River Ins Co	NJ	\$18,626	0.01%
20397	Vigilant Ins Co	NY	\$477,705	0.32%	20621	OneBeacon Amer Ins Co	MA	\$18,497	0.01%
10510	Carolina Cas Ins Co	IA	\$461,952	0.31%	24988	Sentry Ins A Mut Co	WI	\$17,496	0.01%
12718	Developers Surety & Ind Co	IA	\$444,717	0.30%	25615	Charter Oak Fire Ins Co	CT	\$17,389	0.01%
28519	First Sealord Surety Inc	PA	\$430,956	0.29%	33855	Lincoln Gen Ins Co	PA	\$16,700	0.01%
37206	Contractors Bonding & Ins Co	WA	\$396,083	0.27%	25674	Travelers Property Cas Co Of Amer	CT	\$15,414	0.01%
23841	New Hampshire Ins Co	PA	\$380,627	0.26%	20346	Pacific Ind Co	WI	\$13,950	0.01%
22667	Ace Amer Ins Co	PA	\$325,500	0.22%	26344	Great Amer Assur Co	OH	\$13,146	0.01%
13056	RLI Ins Co	IL	\$321,074	0.22%	14974	Pennsylvania Lumbermens Mut Ins	PA	\$13,025	0.01%
24732	General Ins Co Of Amer	WA	\$317,376	0.22%	19704	American States Ins Co	IN	\$12,776	0.01%
25887	US Fidelity & Guaranty Co	MD	\$295,377	0.20%	22977	Lumbermens Mut Cas Co	IL	\$12,609	0.01%
31325	Acadia Ins Co	NH	\$289,160	0.20%	19259	Selective Ins Co Of SC	IN	\$12,551	0.01%
33898	Aegis Security Ins Co	PA	\$253,874	0.17%	22322	Greenwich Ins Co	DE	\$12,000	0.01%
26247	American Guar & Liab Ins	NY	\$253,196	0.17%	14168	Harleysville Mut Ins Co	PA	\$10,040	0.01%
16578	Fidelity Natl Prop & Cas Ins Co	NY	\$219,180	0.15%	21458	Employers Ins of Wausau	WI	\$10,035	0.01%
10758	Colonial Surety Co	PA	\$215,377	0.15%	33588	First Liberty Ins Corp	IA	\$9,611	0.01%
13307	Lexon Ins Co	TX	\$198,995	0.14%	24449	Regent Ins Co	WI	\$9,497	0.01%
41181	Universal Underwriters Ins Co	KS	\$194,407	0.13%	27847	Insurance Co Of The West	CA	\$9,365	0.01%
25976	Ulica Mut Ins Co	NY	\$187,002	0.13%	25143	State Farm Fire And Cas Co	IL	\$9,256	0.01%
35181	Executive Risk Ind Inc	DE	\$178,353	0.12%	14990	Pennsylvania Natl Mut Cas Ins Co	PA	\$8,677	0.01%
15105	Safety Natl Cas Corp	MO	\$168,161	0.11%	26832	Great Amer Alliance Ins Co	OH	\$8,554	0.01%
10677	Cincinnati Ins Co	OH	\$160,543	0.11%	24198	Peerless Ins Co	NH	\$8,006	0.01%
21113	United States Fire Ins Co	DE	\$154,187	0.10%	25682	Travelers Ind Co Of CT	CT	\$7,637	0.01%
23612	Midwest Employers Cas Co	DE	\$144,969	0.10%	22713	Insurance Co of N Amer	PA	\$7,323	0.00%
33162	Bankers Ins Co	FL	\$121,695	0.08%	20370	AXIS Reins Co	NY	\$7,200	0.00%



			Premium Written in MA as of	Market Share in MA as of				Premium Written in MA as of	Market Share in MA as of		
NAIC #	Company Name	State	12/31/2008	12/31/2008	NAIC #	Company Name	State	12/31/2008	12/31/2008		
29580	Berkley Regional Ins Co	DE	\$6,408	0.00%	29513	The Bar Plan Mut Ins Co	MO	\$378	0.00%		
34347	Colonial Amer Cas & Surety Co	MD	\$6,343	0.00%	26433	Harco Natl Ins Co	IL	\$320	0.00%		
22918	American Motorists Ins Co	IL	\$6,131	0.00%	10111	American Bankers Ins Co Of FL	FL	\$250	0.00%		
31534	Citizens Ins Co Of Amer	MI	\$5,742	0.00%	19356	Maryland Cas Co	MD	\$239	0.00%		
22357	Hartford Accident & Ind Co	CT	\$5,730	0.00%	32620	National Interstate Ins Co	OH	\$100	0.00%		
24414	General Cas Co Of WI	WI	\$5,633	0.00%	20699	Ace Prop & Cas Ins Co	PA	\$69	0.00%		
36463	Discover Prop & Cas Ins Co	IL	\$5,103	0.00%	23434	Middlesex Ins Co	WI	\$60	0.00%		
10205	Mountain Valley Ind Co	NH	\$4,237	0.00%	Total Direct Written Premium					\$147,124,303	100.00%
24775	St Paul Guardian Ins Co	MN	\$2,908	0.00%							
43575	Indemnity Ins Co Of North Amer	PA	\$2,685	0.00%							
25623	Phoenix Ins Co	CT	\$1,961	0.00%							
39926	Selective Ins Co Of The Southeast	IN	\$1,909	0.00%							
22012	Motors Ins Corp	MI	\$1,828	0.00%							
12904	Tokio Marine & Nichido Fire Ins Co	NY	\$1,764	0.00%							
25666	Travelers Ind Co Of Amer	CT	\$1,501	0.00%							
19690	American Economy Ins Co	IN	\$1,341	0.00%							
12866	T.H.E. Ins Co	LA	\$900	0.00%							
10499	DaimlerChrysler Ins Co	MI	\$873	0.00%							
20508	Valley Forge Ins Co	PA	\$769	0.00%							
21962	Pennsylvania Gen Ins Co	PA	\$694	0.00%							
18538	Bancinsure Inc	OK	\$681	0.00%							
20230	Central Mut Ins Co	OH	\$598	0.00%							
20494	Transportation Ins Co	IL	\$550	0.00%							
31089	Republic Western Ins Co	AZ	\$525	0.00%							
13331	American Hardware Mut Ins Co	OH	\$509	0.00%							

## 2008 Premium and Market Share - FIRE

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
21482	Factory Mut Ins Co	RI	\$18,009,722	8.42%	14788	NGM Ins Co	FL	\$593,455	0.28%
42978	American Security Ins Co	DE	\$16,270,046	7.61%	10936	Seneca Ins Co Inc	NY	\$573,543	0.27%
41360	Arbella Protection Ins Co	MA	\$14,683,447	6.87%	25682	Travelers Ind Co Of CT	CT	\$534,590	0.25%
19798	Merrimack Mut Fire Ins Co	MA	\$11,790,931	5.52%	21261	Electric Ins Co	MA	\$494,905	0.23%
23035	Liberty Mut Fire Ins Co	WI	\$11,565,145	5.41%	41343	Gerling Amer Ins Co	NY	\$494,405	0.23%
42552	Nova Cas Co	NY	\$10,795,496	5.05%	20346	Pacific Ind Co	WI	\$468,891	0.22%
37273	Axis Ins Co	IL	\$10,148,810	4.75%	13706	Dorchester Mut Ins Co	MA	\$434,908	0.20%
34754	Commerce Ins Co	MA	\$9,852,868	4.61%	25860	Union Mut Fire Ins Co	VT	\$428,572	0.20%
25658	Travelers Ind Co	CT	\$8,049,315	3.77%	22306	Massachusetts Bay Ins Co	NH	\$422,710	0.20%
10014	Affiliated Fm Ins Co	RI	\$7,601,378	3.56%	40320	Massachusetts Homeland Ins Co	MA	\$392,871	0.18%
26018	Vermont Mut Ins Co	VT	\$6,047,490	2.83%	21873	Firemans Fund Ins Co	CA	\$386,673	0.18%
26298	Metropolitan Prop & Cas Ins Co	RI	\$4,431,514	2.07%	24988	Sentry Ins A Mut Co	WI	\$376,439	0.18%
15067	Quincy Mut Fire Ins Co	MA	\$4,371,371	2.04%	24198	Peerless Ins Co	NH	\$366,616	0.17%
24767	St Paul Fire & Marine Ins Co	MN	\$3,882,110	1.82%	19402	AIG Cas Co	PA	\$364,603	0.17%
21113	United States Fire Ins Co	DE	\$3,836,696	1.79%	19682	Hartford Fire In Co	CT	\$337,053	0.16%
13803	Farm Family Cas Ins Co	NY	\$3,682,155	1.72%	11150	Arch Ins Co	MO	\$320,297	0.15%
26247	American Guar & Liab Ins	NY	\$3,311,755	1.55%	14982	Penn Millers Ins Co	PA	\$315,160	0.15%
17000	Arbella Mut Ins Co	MA	\$3,273,773	1.53%	20303	Great Northern Ins Co	IN	\$311,934	0.15%
19771	Cambridge Mut Fire Ins Co	MA	\$3,261,777	1.53%	25615	Charter Oak Fire Ins Co	CT	\$309,590	0.14%
25674	Travelers Property Cas Co Of Amer	CT	\$3,117,226	1.46%	22578	Horace Mann Ins Co	IL	\$292,161	0.14%
24813	Balboa Ins Co	CA	\$3,021,934	1.41%	10205	Mountain Valley Ind Co	NH	\$292,078	0.14%
23469	American Modern Home Ins Co	OH	\$2,429,703	1.14%	43702	Tower National Ins Co	MA	\$280,328	0.13%
20621	OneBeacon Amer Ins Co	MA	\$2,356,095	1.10%	24791	St Paul Mercury Ins Co	MN	\$268,159	0.13%
41181	Universal Underwriters Ins Co	KS	\$2,348,233	1.10%	21857	American Ins Co	OH	\$237,200	0.11%
19429	Insurance Co Of The State Of PA	PA	\$2,093,946	0.98%	44300	Tower Ins Co Of NY	NY	\$234,144	0.11%
35300	Allianz Global Risks US Ins Co	CA	\$2,033,936	0.95%	25992	Northern Security Ins Co Inc	VT	\$225,030	0.11%
16535	Zurich American Ins Co	NY	\$1,974,959	0.92%	20397	Vigilant Ins Co	NY	\$203,567	0.10%
15024	Preferred Mut Ins Co	NY	\$1,802,657	0.84%	21415	Employers Mut Cas Co	IA	\$176,218	0.08%
19356	Maryland Cas Co	MD	\$1,574,080	0.74%	13935	Federated Mut Ins Co	MN	\$172,038	0.08%
25941	USAA	TX	\$1,571,471	0.74%	25976	Utica Mut Ins Co	NY	\$169,310	0.08%
39454	Safety Ins Co	MA	\$1,391,210	0.65%	29874	North Amer Specialty Ins Co	NH	\$169,242	0.08%
24554	XL Ins Amer Inc	DE	\$1,375,736	0.64%	21180	Sentry Select Ins Co	WI	\$165,787	0.08%
22292	Hanover Ins Co	NH	\$1,303,340	0.61%	24414	General Cas Co Of WI	WI	\$159,399	0.07%
23809	Granite State Ins Co	PA	\$1,210,240	0.57%	23175	Phenix Mut Fire Ins Co	NH	\$133,942	0.06%
14974	Pennsylvania Lumbermens Mut Ins	PA	\$1,184,380	0.55%	14354	Jewelers Mut Ins Co	WI	\$130,694	0.06%
13463	Barnstable Cnty Mut Ins Co	MA	\$1,161,544	0.54%	22136	Great Amer Ins Co of NY	NY	\$125,648	0.06%
19038	Travelers Cas & Surety Co	CT	\$1,106,437	0.52%	11126	Sompo Japan Ins Co of Amer	NY	\$123,716	0.06%
21881	National Surety Corp	IL	\$1,106,144	0.52%	39926	Selective Ins Co Of The Southeast	IN	\$114,776	0.05%
23965	Norfolk & Dedham Mut Fire Ins Co	MA	\$1,085,920	0.51%	24775	St Paul Guardian Ins Co	MN	\$112,393	0.05%
10069	Housing Authority Prop A Mut Co	VT	\$1,058,124	0.49%	19224	St Paul Protective Ins Co	IL	\$109,461	0.05%
12904	Tokio Marine & Nichido Fire Ins Co	NY	\$1,026,025	0.48%	31325	Acadia Ins Co	NH	\$108,982	0.05%
26182	Harleysville Worcester Ins Co	PA	\$994,943	0.47%	42048	Diamond State Ins Co	IN	\$98,972	0.05%
19070	Standard Fire Ins Co	CT	\$933,191	0.44%	25666	Travelers Ind Co Of Amer	CT	\$98,889	0.05%
14826	New London Cnty Mut Ins Co	CT	\$930,965	0.44%	39306	Fidelity & Deposit Co Of MD	MD	\$93,660	0.04%
23043	Liberty Mut Ins Co	MA	\$922,530	0.43%	19445	National Union Fire Ins Co Of Pitts	PA	\$91,382	0.04%
14192	Hingham Mut Fire Ins Co	MA	\$895,146	0.42%	33618	Safety Ind Ins Co	MA	\$91,344	0.04%
10815	Verlan Fire Ins Co MD	MD	\$864,950	0.40%	36463	Discover Prop & Cas Ins Co	IL	\$88,347	0.04%
14923	Patrons Mut Ins Co Of Ct	CT	\$864,141	0.40%	20230	Central Mut Ins Co	OH	\$83,838	0.04%
14206	Holyoke Mut Ins Co In Salem	MA	\$832,839	0.39%	43001	Narragansett Bay Ins Co	RI	\$81,370	0.04%
15040	Providence Mut Fire Ins Co	RI	\$794,758	0.37%	14532	Middlesex Mut Assur Co	CT	\$72,238	0.03%
12154	Encompass Ins Co of MA	MA	\$779,377	0.36%	37257	Praetorian Ins Co	IL	\$70,184	0.03%
22314	RSUI Ind Co	NH	\$759,487	0.36%	26344	Great Amer Assur Co	OH	\$61,898	0.03%
20370	AXIS Reins Co	NY	\$746,960	0.35%	22713	Insurance Co of N Amer	PA	\$56,860	0.03%
19259	Selective Ins Co Of SC	IN	\$736,344	0.34%	37540	Beazley Ins Co Inc	CT	\$56,617	0.03%
39845	Westport Ins Corp	MO	\$732,370	0.34%	42404	Liberty Ins Corp	IL	\$56,529	0.03%
20281	Federal Ins Co	IN	\$693,523	0.32%	15059	Public Service Mut Ins Co	NY	\$54,039	0.03%
25968	USAA Cas Ins Co	TX	\$681,417	0.32%	11185	Foremost Ins Co	MI	\$54,013	0.03%
13943	Fitchburg Mut Ins Co	MA	\$658,125	0.31%	24171	Netherlands Ins Co The	NH	\$51,075	0.02%
20648	Employers Fire Ins Co	MA	\$640,375	0.30%	41459	Armed Forces Ins Exch	KS	\$48,039	0.02%
19976	Amica Mut Ins Co	RI	\$636,698	0.30%	24031	Northland Cas Co	MN	\$47,609	0.02%

			Premium Written in MA as of	Market Share in MA as of				Premium Written in MA as of	Market Share in MA as of
NAIC #	Company Name	State	12/31/2008	12/31/2008	NAIC #	Company Name	State	12/31/2008	12/31/2008
22187	Greater NY Mut Ins Co	NY	\$46,935	0.02%	10499	DaimlerChrysler Ins Co	MI	\$2,262	0.00%
21784	Firemens Ins Co Of Washington DC	DE	\$46,200	0.02%	20494	Transportation Ins Co	IL	\$1,673	0.00%
35289	Continental Ins Co	PA	\$45,236	0.02%	44393	West American Ins Co	IN	\$1,429	0.00%
14168	Harleysville Mut Ins Co	PA	\$44,914	0.02%	10472	Capitol Ind Corp	WI	\$1,405	0.00%
20362	Mitsui Sumitomo Ins Co of Amer	NY	\$44,008	0.02%	26522	Mount Vernon Fire Ins Co	PA	\$953	0.00%
25143	State Farm Fire And Cas Co	IL	\$43,837	0.02%	26042	Wausau Underwriters Ins Co	WI	\$673	0.00%
19380	American Home Assur Co	NY	\$43,235	0.02%	12777	Chubb Ind Ins Co	NY	\$624	0.00%
31534	Citizens Ins Co Of Amer	MI	\$42,887	0.02%	26069	Wausau Business Ins Co	WI	\$576	0.00%
35696	Harleysville Preferred Ins Co	PA	\$36,427	0.02%	18023	Star Ins Co	MI	\$348	0.00%
23108	Lumbermens Underwriting Alliance	MO	\$36,326	0.02%	10677	Cincinnati Ins Co	OH	\$315	0.00%
16217	National Farmers Union Prop & Cas	CO	\$33,497	0.02%	31135	Great Amer Security Ins Co	OH	\$217	0.00%
23329	Merchants Mut Ins Co	NY	\$29,028	0.01%	25011	Wesco Ins Co	DE	\$208	0.00%
30104	Hartford Underwriters Ins Co	CT	\$27,383	0.01%	13714	Pharmacists Mut Ins Co	IA	\$170	0.00%
12866	T.H.E. Ins Co	LA	\$25,569	0.01%	10804	Continental Western Ins Co	IA	\$54	0.00%
33588	First Liberty Ins Corp	IA	\$20,160	0.01%	38970	Markel Ins Co	IL	\$53	0.00%
21849	American Automobile Ins Co	MO	\$19,564	0.01%	15032	Guideone Mut Ins Co	IA	\$41	0.00%
25844	Union Ins Co	IA	\$17,690	0.01%	Total Direct Written Premium\$213,785,189100.00%				
25623	Phoenix Ins Co	CT	\$17,129	0.01%					
18333	Peerless Ind Ins Co	IL	\$15,597	0.01%					
26433	Harco Natl Ins Co	IL	\$15,575	0.01%					
10340	Stonington Ins Co	TX	\$15,248	0.01%					
24074	Ohio Cas Ins Co	OH	\$13,932	0.01%					
11045	Excelsior Ins Co	NH	\$12,416	0.01%					
21326	Empire Fire & Marine Ins Co	NE	\$10,706	0.01%					
11024	Strathmore Ins Co	NY	\$10,245	0.00%					
25054	Hudson Ins Co	DE	\$10,175	0.00%					
19704	American States Ins Co	IN	\$9,738	0.00%					
21458	Employers Ins of Wausau	WI	\$9,551	0.00%					
25984	Graphic Arts Mut Ins Co	NY	\$9,407	0.00%					
22195	Insurance Co Of Greater NY	NY	\$9,160	0.00%					
23337	American European Ins Co	NH	\$8,795	0.00%					
20427	American Cas Co Of Reading PA	PA	\$8,620	0.00%					
41955	Barnstable Cnty Ins Co	MA	\$8,576	0.00%					
19690	American Economy Ins Co	IN	\$8,565	0.00%					
20222	All Amer Ins Co	OH	\$8,544	0.00%					
16691	Great Amer Ins Co	OH	\$7,381	0.00%					
24732	General Ins Co Of Amer	WA	\$6,739	0.00%					
20508	Valley Forge Ins Co	PA	\$6,358	0.00%					
11231	Generali Us Branch	NY	\$6,105	0.00%					
19895	Atlantic Mut Ins Co	NY	\$5,551	0.00%					
26832	Great Amer Alliance Ins Co	OH	\$5,204	0.00%					
24066	American Fire & Cas Co	OH	\$4,788	0.00%					
13331	American Hardware Mut Ins Co	OH	\$4,605	0.00%					
20443	Continental Cas Co	IL	\$4,138	0.00%					
23841	New Hampshire Ins Co	PA	\$3,959	0.00%					
24724	First Natl Ins Co Of Amer	WA	\$3,886	0.00%					
21970	OneBeacon Ins Co	PA	\$3,668	0.00%					
10111	American Bankers Ins Co Of FL	FL	\$3,615	0.00%					
27073	Nipponkoa Ins Co Ltd US Br	NY	\$3,488	0.00%					
12475	Republic-Franklin Ins Co	OH	\$3,469	0.00%					
29939	Main St Amer Assur Co	FL	\$3,291	0.00%					
11991	National Cas Co	WI	\$3,109	0.00%					
22551	Mitsui Sumitomo Ins USA Inc	NY	\$2,708	0.00%					

## 2008 Premium and Market Share - FRATERNALS

	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
	58033	Knights Of Columbus	CT	\$25,471,178	55.79%
	56014	Thrivent Financial For Lutherans	WI	\$11,618,539	25.45%
	58068	Independent Order Of Foresters Us Br	NY	\$1,936,341	4.24%
	57541	Modern Woodmen Of Amer	IL	\$1,753,874	3.84%
	56022	Catholic Family Life Ins	WI	\$1,544,437	3.38%
	57487	Catholic Order Of Foresters	IL	\$681,701	1.49%
	57622	Polish Natl Alliance Us Of Na	IL	\$518,884	1.14%
	57770	Catholic Holy Family Society	IL	\$292,075	0.64%
	57630	Polish Roman Catholic Union Of Amer	IL	\$285,694	0.63%
	58181	Supreme Council The Royal Arcanum	MA	\$277,705	0.61%
	58130	Catholic Assn Of Foresters	MA	\$203,331	0.45%
	57142	Sons Of Norway	MN	\$175,923	0.39%
	57320	Woodmen World Life Ins Soc	NE	\$161,436	0.35%
	57967	Luso Amer Life Ins Society	CA	\$159,116	0.35%
	57010	William Penn Assn	PA	\$142,914	0.31%
	56758	Loyal Christian Benefit Assn	PA	\$126,422	0.28%
	56383	Order of United Commerical Travelers	OH	\$95,699	0.21%
	57215	Ukrainian Natl Assn Inc	NJ	\$55,432	0.12%
	57649	Polish Womens Alliance Of Amer	IL	\$32,239	0.07%
	56820	Polish Falcons Of Amer	PA	\$31,617	0.07%
	57193	Slovak Catholic Sokol	NJ	\$26,476	0.06%
	56340	First Cath Slovak Union Of US & CN	OH	\$19,233	0.04%
	56839	Polish Natl Union Of Amer	PA	\$14,037	0.03%
	57509	Independent Order Of Vikings	IL	\$9,001	0.02%
	57290	Workmens Benefit Fund Of The USA	NY	\$8,462	0.02%
	56332	First Cath Slovak Ladies Assn USA	OH	\$3,608	0.01%
	57282	Polish Union Of Amer	NY	\$2,227	0.00%
	57207	Slovak Gymnastic Union Sokol Usa	NJ	\$1,697	0.00%
	58262	Lithuanian Alliance Of Amer	PA	\$1,693	0.00%
	56715	Ladies Pa Slovak Catholic Union	PA	\$466	0.00%
	Total Direct Written Premium			\$45,651,457	100.00%

## 2008 Premium and Market Share - HEALTH

	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
	12219	BCBS of MA HMO Blue Inc	MA	\$4,426,148,846	29.81%
	53228	BCBS of MA	MA	\$2,271,273,848	15.30%
	95688	Tufts Assocd Hmo Inc	MA	\$2,242,061,454	15.10%
	96911	Harvard Pilgrim Hlth Care Inc	MA	\$1,971,473,319	13.28%
	13203	Boston Medical Center Hlth Plan Inc	MA	\$1,090,565,465	7.34%
	95541	Fallon Comm Hlth Plan Inc	MA	\$988,206,671	6.65%
	11109	Neighborhood Hlth Plan Inc	MA	\$843,790,581	5.68%
	52060	Dental Serv of MA Inc	MA	\$362,584,664	2.44%
	95673	Health New England Inc	MA	\$287,185,121	1.93%
	18975	HPHC Ins Co Inc	MA	\$74,421,947	0.50%
	60117	Tufts Ins Co Inc	MA	\$55,723,312	0.38%
	95149	United Healthcare Of New Engl Inc	RI	\$39,755,348	0.27%
	10155	Wellcare Prescription Ins Inc	FL	\$38,572,913	0.26%
	12575	SilverScript Ins Co	TN	\$29,088,269	0.20%
	95299	Connecticare Of MA Inc	MA	\$27,744,166	0.19%
	95109	Aetna Hlth Inc PA Corp	PA	\$24,272,893	0.16%
	52632	Altus Dental Ins Co Inc	RI	\$21,293,822	0.14%
	47093	Massachusetts Vision Serv Plan	MA	\$16,416,341	0.11%
	95520	CIGNA Hlthcare of MA Inc	MA	\$13,228,634	0.09%
	66828	Fallon Hlth & Life Assur Co	MA	\$12,818,315	0.09%
	63762	Medco Containment Life Ins Co	PA	\$5,856,284	0.04%
	77399	Sterling Life Ins Co	IL	\$3,233,687	0.02%
	72052	Aetna Hlth Ins Co	PA	\$1,198,823	0.01%
	12210	Dentegra Ins Co of New England	MA	\$657,066	0.00%
	12747	Envision Ins Co	OH	\$554,613	0.00%
	78611	HCSC Ins Serv Co	IL	\$488,234	0.00%
	70670	Health Care Serv Corp A Mut Legal Re	IL	\$318,377	0.00%
	85766	United Concordia Ins Co	AZ	\$206,603	0.00%
	61700	Renaissance L & H Ins Co of Amer	DE	\$17,639	0.00%
	85286	OneNation Ins Co	IN	\$162	0.00%
	Total Direct Written Premium			\$14,849,157,417	100.00%

## 2008 Premium and Market Share - HOMEOWNER'S MULTI-PERIL

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
19798	Merrimack Mut Fire Ins Co	MA	\$97,511,223	5.89%	19682	Hartford Fire In Co	CT	\$4,270,132	0.26%
40274	Citation Ins Co	MA	\$97,416,128	5.88%	21261	Electric Ins Co	MA	\$4,254,464	0.26%
23035	Liberty Mut Fire Ins Co	WI	\$96,966,024	5.86%	21970	OneBeacon Ins Co	PA	\$4,240,230	0.26%
17000	Arbella Mut Ins Co	MA	\$90,716,986	5.48%	11185	Foremost Ins Co	MI	\$3,996,755	0.24%
15067	Quincy Mut Fire Ins Co	MA	\$83,480,757	5.04%	35696	Harleysville Preferred Ins Co	PA	\$3,928,266	0.24%
34754	Commerce Ins Co	MA	\$74,509,052	4.50%	23175	Phenix Mut Fire Ins Co	NH	\$3,712,210	0.22%
25623	Phoenix Ins Co	CT	\$63,925,070	3.86%	41955	Barnstable Cnty Ins Co	MA	\$3,456,078	0.21%
26018	Vermont Mut Ins Co	VT	\$61,678,459	3.72%	13803	Farm Family Cas Ins Co	NY	\$3,405,696	0.21%
19976	Amica Mut Ins Co	RI	\$51,330,488	3.10%	30104	Hartford Underwriters Ins Co	CT	\$2,905,416	0.18%
26298	Metropolitan Prop & Cas Ins Co	RI	\$48,588,229	2.93%	36137	Travelers Commercial Ins Co	CT	\$2,743,208	0.17%
20281	Federal Ins Co	IN	\$44,475,276	2.69%	25976	Utica Mut Ins Co	NY	\$2,606,888	0.16%
20346	Pacific Ind Co	WI	\$41,659,582	2.52%	20621	OneBeacon Amer Ins Co	MA	\$2,432,448	0.15%
33618	Safety Ind Ins Co	MA	\$41,085,705	2.48%	22683	Teachers Ins Co	IL	\$2,346,535	0.14%
10394	Bunker Hill Ins Co	MA	\$33,839,826	2.04%	29939	Main St Amer Assur Co	FL	\$2,040,668	0.12%
15024	Preferred Mut Ins Co	NY	\$30,713,481	1.85%	12808	Safety Prop & Cas Ins Co	MA	\$1,913,935	0.12%
19070	Standard Fire Ins Co	CT	\$29,055,309	1.75%	24198	Peerless Ins Co	NH	\$1,691,006	0.10%
13463	Barnstable Cnty Mut Ins Co	MA	\$27,992,642	1.69%	21849	American Automobile Ins Co	MO	\$1,555,520	0.09%
25941	USAA	TX	\$27,287,787	1.65%	42404	Liberty Ins Corp	IL	\$1,419,800	0.09%
32220	American Intl Ins Co	NY	\$26,668,947	1.61%	43702	Tower National Ins Co	MA	\$1,312,310	0.08%
14192	Hingham Mut Fire Ins Co	MA	\$25,358,313	1.53%	25984	Graphic Arts Mut Ins Co	NY	\$1,215,420	0.07%
20303	Great Northern Ins Co	IN	\$24,833,628	1.50%	16578	Fidelity Natl Prop & Cas Ins Co	NY	\$1,165,529	0.07%
19771	Cambridge Mut Fire Ins Co	MA	\$24,375,716	1.47%	10111	American Bankers Ins Co Of FL	FL	\$1,124,360	0.07%
31534	Citizens Ins Co Of Amer	MI	\$23,670,676	1.43%	25992	Northern Security Ins Co Inc	VT	\$1,040,294	0.06%
25658	Travelers Ind Co	CT	\$22,110,537	1.34%	14532	Middlesex Mut Assur Co	CT	\$1,026,576	0.06%
39454	Safety Ins Co	MA	\$21,059,280	1.27%	24813	Balboa Ins Co	CA	\$1,013,142	0.06%
14788	NGM Ins Co	FL	\$20,823,216	1.26%	21113	United States Fire Ins Co	DE	\$932,363	0.06%
22306	Massachusetts Bay Ins Co	NH	\$19,116,080	1.15%	12901	Merchants Preferred Ins Co	NY	\$919,675	0.06%
15040	Providence Mut Fire Ins Co	RI	\$18,807,455	1.14%	13927	Homesite Ins Co Of The Midwest	ND	\$913,344	0.06%
20397	Vigilant Ins Co	NY	\$18,688,563	1.13%	23469	American Modern Home Ins Co	OH	\$866,344	0.05%
13706	Dorchester Mut Ins Co	MA	\$18,290,405	1.10%	23329	Merchants Mut Ins Co	NY	\$759,540	0.05%
25968	USAA Cas Ins Co	TX	\$17,346,438	1.05%	24740	Safeco Ins Co Of Amer	WA	\$701,715	0.04%
23965	Norfolk & Dedham Mut Fire Ins Co	MA	\$17,265,686	1.04%	41459	Armed Forces Ins Exch	KS	\$670,873	0.04%
14826	New London Cnty Mut Ins Co	CT	\$15,862,099	0.96%	31325	Acadia Ins Co	NH	\$616,784	0.04%
14206	Holyoke Mut Ins Co In Salem	MA	\$15,136,590	0.91%	19615	American Reliable Ins Co	AZ	\$598,504	0.04%
19038	Travelers Cas & Surety Co	CT	\$13,318,749	0.80%	11800	Foremost Prop & Cas Ins Co	MI	\$575,022	0.03%
12154	Encompass Ins Co of MA	MA	\$13,066,832	0.79%	22187	Greater NY Mut Ins Co	NY	\$571,618	0.03%
40320	Massachusetts Homeland Ins Co	MA	\$12,412,013	0.75%	21423	Union Ins Co Of Providence	IA	\$569,438	0.03%
13943	Fitchburg Mut Ins Co	MA	\$12,298,647	0.74%	37346	Danbury Ins Co	MA	\$529,269	0.03%
21857	American Ins Co	OH	\$11,353,065	0.69%	15059	Public Service Mut Ins Co	NY	\$516,382	0.03%
23043	Liberty Mut Ins Co	MA	\$10,981,765	0.66%	21784	Firemens Ins Co Of Washington DC	DE	\$498,125	0.03%
42650	OneBeacon Midwest Ins Co	WI	\$10,238,322	0.62%	37710	First Amer Prop & Cas Ins Co	CA	\$457,569	0.03%
25852	New England Guar Ins Co Inc	VT	\$10,077,718	0.61%	21415	Employers Mut Cas Co	IA	\$453,883	0.03%
21873	Firemans Fund Ins Co	CA	\$9,369,522	0.57%	10014	Affiliated Fm Ins Co	RI	\$447,297	0.03%
33600	LM Ins Corp	IA	\$9,302,985	0.56%	23337	American European Ins Co	NH	\$433,261	0.03%
26182	Harleysville Worcester Ins Co	PA	\$8,886,474	0.54%	24171	Netherlands Ins Co The	NH	\$212,599	0.01%
14923	Patrons Mut Ins Co Of Ct	CT	\$8,111,448	0.49%	26344	Great Amer Assur Co	OH	\$201,681	0.01%
22578	Horace Mann Ins Co	IL	\$7,575,640	0.46%	23450	American Family Home Ins Co	FL	\$179,464	0.01%
22292	Hanover Ins Co	NH	\$7,458,397	0.45%	14974	Pennsylvania Lumbermens Mut Ins	PA	\$173,928	0.01%
21865	Associated Ind Corp	CA	\$7,418,987	0.45%	14982	Penn Millers Ins Co	PA	\$138,010	0.01%
43001	Narragansett Bay Ins Co	RI	\$6,520,237	0.39%	21326	Empire Fire & Marine Ins Co	NE	\$135,487	0.01%
10231	Commonwealth Mut Ins Co	MA	\$5,648,078	0.34%	11024	Strathmore Ins Co	NY	\$123,916	0.01%
20648	Employers Fire Ins Co	MA	\$5,609,134	0.34%	33898	Aegis Security Ins Co	PA	\$118,942	0.01%
24414	General Cas Co Of WI	WI	\$5,566,740	0.34%	42978	American Security Ins Co	DE	\$113,912	0.01%
20680	Green Mountain Ins Co Inc	VT	\$5,318,214	0.32%	22195	Insurance Co Of Greater NY	NY	\$111,244	0.01%
14168	Harleysville Mut Ins Co	PA	\$5,210,980	0.31%	19909	Centennial Ins Co	NY	\$107,113	0.01%
25860	Union Mut Fire Ins Co	VT	\$4,807,832	0.29%	24988	Sentry Ins A Mut Co	WI	\$103,778	0.01%
25143	State Farm Fire And Cas Co	IL	\$4,671,987	0.28%	11045	Excelsior Ins Co	NH	\$88,740	0.01%
33588	First Liberty Ins Corp	IA	\$4,641,661	0.28%	22136	Great Amer Ins Co of NY	NY	\$69,148	0.00%
31267	York Ins Co of ME	ME	\$4,641,216	0.28%	13331	American Hardware Mut Ins Co	OH	\$65,781	0.00%
21962	Pennsylvania Gen Ins Co	PA	\$4,585,315	0.28%	39306	Fidelity & Deposit Co Of MD	MD	\$48,553	0.00%

			Premium Written in MA as of	Market Share in MA as of				Premium Written in MA as of	Market Share in MA as of		
NAIC #	Company Name	State	12/31/2008	12/31/2008	NAIC #	Company Name	State	12/31/2008	12/31/2008		
19259	Selective Ins Co Of SC	IN	\$45,977	0.00%	18333	Peerless Ind Ins Co	IL	\$8,842	0.00%		
29459	Twin City Fire Ins Co Co	IN	\$43,845	0.00%	12777	Chubb Ind Ins Co	NY	\$7,470	0.00%		
35289	Continental Ins Co	PA	\$37,828	0.00%	31135	Great Amer Security Ins Co	OH	\$2,469	0.00%		
16691	Great Amer Ins Co	OH	\$34,687	0.00%	Total Direct Written Premium				\$1,655,873,356	100.00%	
10677	Cincinnati Ins Co	OH	\$34,060	0.00%							
13714	Pharmacists Mut Ins Co	IA	\$33,849	0.00%							
10022	Countryway Ins Co	NY	\$13,849	0.00%							
26832	Great Amer Alliance Ins Co	OH	\$12,830	0.00%							
29424	Hartford Cas Ins Co	IN	\$10,510	0.00%							
39926	Selective Ins Co Of The Southeast	IN	\$9,341	0.00%							



## 2008 Premium and Market Share - LIABILITY OTHER THAN AUTO

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
19445	National Union Fire Ins Co Of Pitts	PA	\$113,791,190	10.79%	20346	Pacific Ind Co	WI	\$4,219,642	0.40%
20281	Federal Ins Co	IN	\$95,090,844	9.02%	26182	Harleysville Worcester Ins Co	PA	\$4,080,784	0.39%
22667	Ace Amer Ins Co	PA	\$42,426,168	4.02%	20699	Ace Prop & Cas Ins Co	PA	\$3,918,117	0.37%
16535	Zurich American Ins Co	NY	\$41,304,960	3.92%	41181	Universal Underwriters Ins Co	KS	\$3,603,678	0.34%
20443	Continental Cas Co	IL	\$41,253,459	3.91%	37540	Beazley Ins Co Inc	CT	\$3,600,207	0.34%
37885	XL Specialty Ins Co	DE	\$31,181,587	2.96%	41343	Gerling Amer Ins Co	NY	\$3,578,635	0.34%
29459	Twin City Fire Ins Co Co	IN	\$26,282,241	2.49%	26018	Vermont Mut Ins Co	VT	\$3,459,269	0.33%
24767	St Paul Fire & Marine Ins Co	MN	\$25,921,894	2.46%	21261	Electric Ins Co	MA	\$3,457,280	0.33%
41360	Arbella Protection Ins Co	MA	\$23,216,970	2.20%	32220	American Intl Ins Co	NY	\$3,397,088	0.32%
26247	American Guar & Liab Ins	NY	\$22,613,221	2.14%	39454	Safety Ins Co	MA	\$3,356,645	0.32%
23035	Liberty Mut Fire Ins Co	WI	\$22,316,281	2.12%	23841	New Hampshire Ins Co	PA	\$2,996,331	0.28%
24791	St Paul Mercury Ins Co	MN	\$19,652,154	1.86%	25682	Travelers Ind Co Of CT	CT	\$2,948,545	0.28%
25658	Travelers Ind Co	CT	\$18,837,335	1.79%	17000	Arbella Mut Ins Co	MA	\$2,925,630	0.28%
25674	Travelers Property Cas Co Of Amer	CT	\$16,947,081	1.61%	20230	Central Mut Ins Co	OH	\$2,861,021	0.27%
18058	Philadelphia Ind Ins Co	PA	\$16,200,320	1.54%	22241	Medmarc Cas Ins Co	VT	\$2,811,113	0.27%
23043	Liberty Mut Ins Co	MA	\$15,979,823	1.52%	25054	Hudson Ins Co	DE	\$2,790,628	0.26%
19801	Argonaut Ins Co	IL	\$12,504,922	1.19%	11255	Caterpillar Ins Co	MO	\$2,710,427	0.26%
29599	US Specialty Ins Co	TX	\$12,491,741	1.18%	19720	American Alt Ins Corp	DE	\$2,700,928	0.26%
25976	Utica Mut Ins Co	NY	\$11,617,611	1.10%	20494	Transportation Ins Co	IL	\$2,623,829	0.25%
11991	National Cas Co	WI	\$11,385,480	1.08%	36463	Discover Prop & Cas Ins Co	IL	\$2,623,699	0.25%
37273	Axis Ins Co	IL	\$10,994,114	1.04%	40274	Citation Ins Co	MA	\$2,566,125	0.24%
35181	Executive Risk Ind Inc	DE	\$10,807,412	1.03%	26344	Great Amer Assur Co	OH	\$2,528,090	0.24%
21121	Westchester Fire Ins Co	NY	\$10,643,147	1.01%	26298	Metropolitan Prop & Cas Ins Co	RI	\$2,481,341	0.24%
21857	American Ins Co	OH	\$9,882,472	0.94%	20303	Great Northern Ins Co	IN	\$2,319,700	0.22%
31325	Acadia Ins Co	NH	\$9,821,607	0.93%	23809	Granite State Ins Co	PA	\$2,296,293	0.22%
31194	Travelers Cas & Surety Co Of Amer	CT	\$9,532,342	0.90%	21458	Employers Ins of Wausau	WI	\$2,187,503	0.21%
24147	Old Republic Ins Co	PA	\$9,421,627	0.89%	14788	NGM Ins Co	FL	\$2,114,728	0.20%
22292	Hanover Ins Co	NH	\$9,361,522	0.89%	19429	Insurance Co Of The State Of PA	PA	\$2,038,307	0.19%
19917	Liberty Ins Underwriters Inc	NY	\$8,955,526	0.85%	13935	Federated Mut Ins Co	MN	\$1,992,407	0.19%
22322	Greenwich Ins Co	DE	\$8,436,670	0.80%	19771	Cambridge Mut Fire Ins Co	MA	\$1,923,522	0.18%
19798	Merrimack Mut Fire Ins Co	MA	\$8,021,873	0.76%	27120	Trumbull Ins Co	CT	\$1,843,549	0.17%
21105	North River Ins Co	NJ	\$7,957,539	0.75%	34754	Commerce Ins Co	MA	\$1,819,553	0.17%
11150	Arch Ins Co	MO	\$7,655,872	0.73%	25941	USAA	TX	\$1,769,621	0.17%
26522	Mount Vernon Fire Ins Co	PA	\$7,080,902	0.67%	22136	Great Amer Ins Co of NY	NY	\$1,713,528	0.16%
16691	Great Amer Ins Co	OH	\$6,732,007	0.64%	42404	Liberty Ins Corp	IL	\$1,655,341	0.16%
19682	Hartford Fire In Co	CT	\$6,454,539	0.61%	21113	United States Fire Ins Co	DE	\$1,626,056	0.15%
25615	Charter Oak Fire Ins Co	CT	\$6,143,093	0.58%	10205	Mountain Valley Ind Co	NH	\$1,621,239	0.15%
20648	Employers Fire Ins Co	MA	\$6,104,273	0.58%	16608	New York Marine & Gen Ins Co	NY	\$1,570,010	0.15%
29424	Hartford Cas Ins Co	IN	\$6,027,867	0.57%	20508	Valley Forge Ins Co	PA	\$1,559,025	0.15%
24554	XL Ins Amer Inc	DE	\$6,000,286	0.57%	20478	National Fire Ins Co Of Hartford	IL	\$1,537,523	0.15%
24198	Peerless Ins Co	NH	\$5,946,702	0.56%	26069	Wausau Business Ins Co	WI	\$1,527,724	0.14%
10510	Carolina Cas Ins Co	IA	\$5,596,327	0.53%	21415	Employers Mut Cas Co	IA	\$1,505,449	0.14%
22314	RSUI Ind Co	NH	\$5,341,122	0.51%	19402	AIG Cas Co	PA	\$1,482,983	0.14%
12831	State Natl Ins Co Inc	TX	\$5,198,175	0.49%	14206	Holyoke Mut Ins Co In Salem	MA	\$1,457,315	0.14%
20621	OneBeacon Amer Ins Co	MA	\$5,030,894	0.48%	24260	Progressive Cas Ins Co	OH	\$1,439,777	0.14%
19380	American Home Assur Co	NY	\$5,029,388	0.48%	39926	Selective Ins Co Of The Southeast	IN	\$1,437,766	0.14%
10120	Everest Natl Ins Co	DE	\$4,961,121	0.47%	10206	Medical Professional Mut Ins Co	MA	\$1,379,205	0.13%
13056	RLI Ins Co	IL	\$4,845,224	0.46%	10690	Allied World Natl Assur Co	NH	\$1,376,554	0.13%
42552	Nova Cas Co	NY	\$4,815,613	0.46%	21873	Firemans Fund Ins Co	CA	\$1,356,410	0.13%
19976	Amica Mut Ins Co	RI	\$4,594,233	0.44%	21970	OneBeacon Ins Co	PA	\$1,344,417	0.13%
13163	Hospitality Mut Ins Co	MA	\$4,581,221	0.43%	20370	AXIS Reins Co	NY	\$1,323,047	0.13%
24074	Ohio Cas Ins Co	OH	\$4,576,082	0.43%	10847	Cumis Ins Society Inc	IA	\$1,322,429	0.13%
19259	Selective Ins Co Of SC	IN	\$4,564,566	0.43%	15040	Providence Mut Fire Ins Co	RI	\$1,259,980	0.12%
25623	Phoenix Ins Co	CT	\$4,523,780	0.43%	23965	Norfolk & Dedham Mut Fire Ins Co	MA	\$1,245,228	0.12%
42307	Navigators Ins Co	NY	\$4,370,269	0.41%	19410	Commerce & Industry Ins Co	NY	\$1,238,956	0.12%
15024	Preferred Mut Ins Co	NY	\$4,363,193	0.41%	20397	Vigilant Ins Co	NY	\$1,238,748	0.12%
39845	Westport Ins Corp	MO	\$4,347,628	0.41%	20362	Mitsui Sumitomo Ins Co of Amer	NY	\$1,140,157	0.11%
13803	Farm Family Cas Ins Co	NY	\$4,293,645	0.41%	38970	Markel Ins Co	IL	\$1,130,341	0.11%

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16624	Darwin Natl Assur Co	DE	\$1,043,045	0.10%	30104	Hartford Underwriters Ins Co	CT	\$400,074	0.04%
37621	Toyota Motor Ins Co	IA	\$1,023,824	0.10%	42234	Minnesota Lawyers Mut Ins Co	MN	\$399,258	0.04%
34347	Colonial Amer Cas & Surety Co	MD	\$1,011,964	0.10%	26042	Wausau Underwriters Ins Co	WI	\$395,104	0.04%
11967	General Star Natl Ins Co	OH	\$977,521	0.09%	22578	Horace Mann Ins Co	IL	\$368,897	0.03%
21881	National Surety Corp	IL	\$960,057	0.09%	24732	General Ins Co Of Amer	WA	\$366,922	0.03%
22357	Hartford Accident & Ind Co	CT	\$935,437	0.09%	40827	Virginia Surety Co Inc	IL	\$364,711	0.03%
29874	North Amer Specialty Ins Co	NH	\$931,642	0.09%	25666	Travelers Ind Co Of Amer	CT	\$351,740	0.03%
14974	Pennsylvania Lumbermens Mut Ins	PA	\$902,861	0.09%	11185	Foremost Ins Co	MI	\$349,529	0.03%
25984	Graphic Arts Mut Ins Co	NY	\$897,428	0.09%	23175	Phenix Mut Fire Ins Co	NH	\$343,810	0.03%
15059	Public Service Mut Ins Co	NY	\$896,467	0.09%	24775	St Paul Guardian Ins Co	MN	\$334,051	0.03%
23329	Merchants Mut Ins Co	NY	\$859,265	0.08%	26832	Great Amer Alliance Ins Co	OH	\$325,456	0.03%
13463	Barnstable Cnty Mut Ins Co	MA	\$845,820	0.08%	34690	Property & Cas Ins Co Of Hartford	IN	\$324,059	0.03%
20222	All Amer Ins Co	OH	\$798,369	0.08%	25143	State Farm Fire And Cas Co	IL	\$313,322	0.03%
19704	American States Ins Co	IN	\$784,823	0.07%	10111	American Bankers Ins Co Of FL	FL	\$310,800	0.03%
37478	Hartford Ins Co Of The Midwest	IN	\$757,640	0.07%	26077	Lancer Ins Co	IL	\$307,646	0.03%
24139	Old Republic Gen Ins Corp	IL	\$756,407	0.07%	25585	Professionals Direct Ins Co	MI	\$299,220	0.03%
12904	Tokio Marine & Nichido Fire Ins Co	NY	\$746,670	0.07%	31534	Citizens Ins Co Of Amer	MI	\$287,173	0.03%
14982	Penn Millers Ins Co	PA	\$730,454	0.07%	22306	Massachusetts Bay Ins Co	NH	\$284,897	0.03%
21865	Associated Ind Corp	CA	\$711,047	0.07%	18767	Church Mut Ins Co	WI	\$278,254	0.03%
23787	Nationwide Mut Ins Co	OH	\$693,039	0.07%	41394	Benchmark Ins Co	KS	\$273,045	0.03%
13706	Dorchester Mut Ins Co	MA	\$690,127	0.07%	22535	Seaboard Surety Co	NY	\$262,186	0.02%
24988	Sentry Ins A Mut Co	WI	\$673,440	0.06%	11126	Sompo Japan Ins Co of Amer	NY	\$260,431	0.02%
23817	Illinois Natl Ins Co	IL	\$665,251	0.06%	13978	Florists Mut Ins Co	IL	\$259,326	0.02%
40320	Massachusetts Homeland Ins Co	MA	\$646,581	0.06%	18619	Platte River Ins Co	NE	\$244,875	0.02%
36340	Camico Mut Ins Co	CA	\$636,490	0.06%	24813	Balboa Ins Co	CA	\$241,498	0.02%
21172	Vanliner Ins Co	MO	\$629,423	0.06%	38962	Genesis Ins Co	CT	\$234,490	0.02%
21180	Sentry Select Ins Co	WI	\$614,386	0.06%	35769	Lyndon Prop Ins Co	MO	\$222,279	0.02%
28932	Markel Amer Ins Co	VA	\$586,406	0.06%	40142	American Zurich Ins Co	IL	\$221,257	0.02%
25968	USAA Cas Ins Co	TX	\$584,317	0.06%	21962	Pennsylvania Gen Ins Co	PA	\$218,160	0.02%
23469	American Modern Home Ins Co	OH	\$582,196	0.06%	20427	American Cas Co Of Reading PA	PA	\$210,087	0.02%
35300	Allianz Global Risks US Ins Co	CA	\$574,938	0.05%	10367	Avemco Ins Co	MD	\$201,115	0.02%
39306	Fidelity & Deposit Co Of MD	MD	\$570,156	0.05%	44393	West American Ins Co	IN	\$199,081	0.02%
12866	T.H.E. Ins Co	LA	\$566,375	0.05%	24066	American Fire & Cas Co	OH	\$195,163	0.02%
12475	Republic-Franklin Ins Co	OH	\$559,535	0.05%	33588	First Liberty Ins Corp	IA	\$194,691	0.02%
12416	Protective Ins Co	IN	\$548,269	0.05%	24031	Northland Cas Co	MN	\$187,377	0.02%
10641	Endurance Amer Ins Co	DE	\$544,875	0.05%	14826	New London Cnty Mut Ins Co	CT	\$183,947	0.02%
14192	Hingham Mut Fire Ins Co	MA	\$537,253	0.05%	21849	American Automobile Ins Co	MO	\$174,613	0.02%
25224	Great Divide Ins Co	ND	\$527,769	0.05%	19224	St Paul Protective Ins Co	IL	\$173,970	0.02%
32077	Heritage Cas Ins Co	IL	\$527,410	0.05%	19941	American Commerce Ins Co	OH	\$173,085	0.02%
10638	Proselet Ins Co	MA	\$520,897	0.05%	31267	York Ins Co of ME	ME	\$168,240	0.02%
36684	Riverport Ins Co	MN	\$512,793	0.05%	18023	Star Ins Co	MI	\$153,533	0.01%
25844	Union Ins Co	IA	\$501,439	0.05%	40436	Stratford Ins Co	NH	\$150,813	0.01%
20796	AIG Premier Ins Co	PA	\$501,429	0.05%	25178	State Farm Mut Auto Ins Co	IL	\$147,663	0.01%
14923	Patrons Mut Ins Co Of Ct	CT	\$494,624	0.05%	13714	Pharmacists Mut Ins Co	IA	\$139,581	0.01%
13943	Fitchburg Mut Ins Co	MA	\$492,171	0.05%	20680	Green Mountain Ins Co Inc	VT	\$120,379	0.01%
24414	General Cas Co Of WI	WI	\$490,089	0.05%	37052	Regis Ins Co	PA	\$106,466	0.01%
43702	Tower National Ins Co	MA	\$485,544	0.05%	19372	Northern Ins Co Of NY	NY	\$89,094	0.01%
10936	Seneca Ins Co Inc	NY	\$483,822	0.05%	14532	Middlesex Mut Assur Co	CT	\$85,445	0.01%
32620	National Interstate Ins Co	OH	\$463,398	0.04%	44300	Tower Ins Co Of NY	NY	\$83,206	0.01%
10804	Continental Western Ins Co	IA	\$458,315	0.04%	27740	North Pointe Ins Co	MI	\$81,834	0.01%
12154	Encompass Ins Co of MA	MA	\$454,948	0.04%	36153	Aetna Ins Co of CT	CT	\$80,205	0.01%
42048	Diamond State Ins Co	IN	\$454,117	0.04%	39217	QBE Ins Corp	PA	\$76,505	0.01%
25860	Union Mut Fire Ins Co	VT	\$442,204	0.04%	21326	Empire Fire & Marine Ins Co	NE	\$75,277	0.01%
13331	American Hardware Mut Ins Co	OH	\$438,872	0.04%	24171	Netherlands Ins Co The	NH	\$72,136	0.01%
33022	AXA Ins Co	NY	\$437,229	0.04%	11452	Hartford Steam Boil Inspec & Ins Co	CT	\$70,552	0.01%
19038	Travelers Cas & Surety Co	CT	\$428,702	0.04%	16551	Savers Prop & Cas Ins Co	MO	\$63,885	0.01%
22187	Greater NY Mut Ins Co	NY	\$419,011	0.04%	23620	Burlington Ins Co	NC	\$63,302	0.01%
22810	Chicago Ins Co	IL	\$418,663	0.04%	13188	Western Surety Co	SD	\$63,082	0.01%
19070	Standard Fire Ins Co	CT	\$417,233	0.04%	18333	Peerless Ind Ins Co	IL	\$62,539	0.01%
14990	Pennsylvania Natl Mut Cas Ins Co	PA	\$411,659	0.04%	10340	Stonington Ins Co	TX	\$62,250	0.01%
35289	Continental Ins Co	PA	\$400,823	0.04%	26433	Harco Natl Ins Co	IL	\$56,385	0.01%

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
11045	Excelsior Ins Co	NH	\$52,891	0.01%	11770	United Encl Cas Co	OH	\$976	0.00%
16578	Fidelity Natl Prop & Cas Ins Co	NY	\$51,817	0.00%	12808	Safety Prop & Cas Ins Co	MA	\$735	0.00%
37257	Praetorian Ins Co	IL	\$42,868	0.00%	23337	American European Ins Co	NH	\$688	0.00%
24724	First Natl Ins Co Of Amer	WA	\$41,955	0.00%	10022	Countryway Ins Co	NY	\$460	0.00%
21784	Firemens Ins Co Of Washington DC	DE	\$39,938	0.00%	12262	Pennsylvania Manufacturers Assoc Ins	PA	\$323	0.00%
19356	Maryland Cas Co	MD	\$36,603	0.00%	11024	Strathmore Ins Co	NY	\$260	0.00%
41459	Armed Forces Ins Exch	KS	\$34,118	0.00%	19615	American Reliable Ins Co	AZ	\$175	0.00%
38245	BCS Ins Co	OH	\$31,877	0.00%	19895	Atlantic Mut Ins Co	NY	\$142	0.00%
37346	Danbury Ins Co	MA	\$27,896	0.00%	23442	Patriot Gen Ins Co	WI	\$100	0.00%
25992	Northern Security Ins Co Inc	VT	\$25,233	0.00%	20702	Ace Fire Underwriters Ins Co	PA	\$1	0.00%
10677	Cincinnati Ins Co	OH	\$24,828	0.00%	Total Direct Written Premium				\$1,054,306,322 100.00%
19690	American Economy Ins Co	IN	\$24,669	0.00%					
15032	Guideone Mut Ins Co	IA	\$24,121	0.00%					
16322	Progressive Direct Ins Co	OH	\$23,951	0.00%					
35408	Delos Ins Co	DE	\$23,862	0.00%					
12901	Merchants Preferred Ins Co	NY	\$22,552	0.00%					
42650	OneBeacon Midwest Ins Co	WI	\$21,770	0.00%					
43001	Narragansett Bay Ins Co	RI	\$21,127	0.00%					
24082	Ohio Security Ins Co	OH	\$19,262	0.00%					
14494	Merchants Bonding Co a Mut	IA	\$18,166	0.00%					
37893	Ullico Cas Co	DE	\$17,888	0.00%					
33618	Safety Ind Ins Co	MA	\$16,298	0.00%					
19399	AIU Ins Co	NY	\$15,182	0.00%					
24740	Safeco Ins Co Of Amer	WA	\$13,429	0.00%					
24678	Arrowood Ind Co	DE	\$11,457	0.00%					
27073	Nipponkoa Ins Co Ltd US Br	NY	\$11,180	0.00%					
33600	LM Ins Corp	IA	\$10,906	0.00%					
10054	Securian Cas Co	MN	\$9,105	0.00%					
41769	Athena Assur Co	MN	\$9,000	0.00%					
36234	Preferred Professional Ins Co	NE	\$6,670	0.00%					
23396	Amerisure Mut Ins Co	MI	\$4,937	0.00%					
14460	Podiatry Ins Co Of Amer A Mut Co	IL	\$4,653	0.00%					
36137	Travelers Commercial Ins Co	CT	\$4,320	0.00%					
10472	Capitol Ind Corp	WI	\$4,253	0.00%					
10243	National Continental Ins Co	NY	\$4,028	0.00%					
10642	Cherokee Ins Co	MI	\$3,116	0.00%					
29939	Main St Amer Assur Co	FL	\$3,096	0.00%					
42376	Technology Ins Co Inc	NH	\$2,703	0.00%					
14168	Harleysville Mut Ins Co	PA	\$2,375	0.00%					
10499	DaimlerChrysler Ins Co	MI	\$2,146	0.00%					
22977	Lumbermens Mut Cas Co	IL	\$1,962	0.00%					
24449	Regent Ins Co	WI	\$1,685	0.00%					
35696	Harleysville Preferred Ins Co	PA	\$1,459	0.00%					
20613	Sparta Ins Co	MA	\$1,333	0.00%					
41335	United Natl Specialty Ins Co	WI	\$1,208	0.00%					
22918	American Motorists Ins Co	IL	\$1,041	0.00%					

## 2008 Premium and Market Share - LIFE

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
65978	Metropolitan Life Ins Co	NY	\$266,048,291	8.52%	93432	CM Life Ins Co	CT	\$9,414,042	0.30%
67091	Northwestern Mut Life Ins Co	WI	\$224,167,297	7.18%	66680	National Life Ins Co	VT	\$8,731,397	0.28%
70435	The Savings Bank Life Ins Co Of MA	MA	\$146,647,201	4.69%	91472	Globe Life & Accident Ins Co	NE	\$8,689,002	0.28%
64246	Guardian Life Ins Co Of Amer	NY	\$131,195,695	4.20%	89206	Ohio Natl Life Assur Corp	OH	\$8,543,607	0.27%
65935	Massachusetts Mut Life Ins Co	MA	\$120,883,445	3.87%	62626	Cuna Mut Ins Society	IA	\$8,539,349	0.27%
65676	Lincoln Natl Life Ins Co	IN	\$118,749,031	3.80%	72222	Amica Life Ins Co	RI	\$7,633,651	0.24%
66915	New York Life Ins Co	NY	\$110,837,565	3.55%	84530	US Financial Life Ins Co	OH	\$7,503,997	0.24%
68241	Prudential Ins Co Of Amer	NJ	\$106,272,072	3.40%	67644	Penn Mut Life Ins Co	PA	\$7,464,920	0.24%
65838	John Hancock Life Ins Co (USA)	MI	\$95,040,533	3.04%	68225	Nationwide Life Ins Co of Amer	PA	\$6,882,102	0.22%
91596	New York Life Ins & Ann Corp	DE	\$69,799,879	2.23%	70837	Union Central Life Ins Co	OH	\$6,878,184	0.22%
70815	Hartford Life & Accident Ins Co	CT	\$62,138,409	1.99%	93548	PHL Variable Ins Co	CT	\$6,820,432	0.22%
67466	Pacific Life Ins Co	NE	\$60,786,363	1.95%	60577	American Income Life Ins Co	IN	\$6,805,939	0.22%
65099	John Hancock Life Ins Co	MA	\$55,084,247	1.76%	93696	Fidelity Investments Life Ins Co	UT	\$6,486,696	0.21%
90204	John Hancock Variable Life Ins Co	MA	\$52,885,851	1.69%	88072	Hartford Life Ins Co	CT	\$6,347,328	0.20%
65005	RiverSource Life Ins Co	MN	\$52,408,216	1.68%	67652	First Penn Pacific Life Ins Co	IN	\$6,311,783	0.20%
79227	Pruco Life Ins Co	AZ	\$50,687,734	1.62%	66281	Monumental Life Ins Co	IA	\$6,185,199	0.20%
80802	US Br SunLife Assur Co Of Canada	MI	\$49,710,604	1.59%	84824	Commonwealth Ann & Life Ins Co	MA	\$6,107,813	0.20%
65536	Genworth Life & Ann Ins Co	VA	\$47,539,113	1.52%	66370	Mony Life Ins Co	NY	\$5,909,331	0.19%
60488	American Gen Life Ins Co	TX	\$47,279,188	1.51%	70025	Genworth Life Ins Co	DE	\$5,782,406	0.19%
67105	Reliastar Life Ins Co	MN	\$45,764,796	1.47%	90611	Allianz Life Ins Co Of N Amer	MN	\$5,383,775	0.17%
86231	Transamerica Life Ins Co	IA	\$43,025,439	1.38%	62049	Colonial Life & Accident Ins Co	SC	\$5,274,039	0.17%
61476	Boston Mut Life Ins Co	MA	\$41,485,486	1.33%	78077	Mony Life Ins Co Of Amer	AZ	\$4,927,030	0.16%
61050	MetLife Investors USA Ins Co	DE	\$41,141,094	1.32%	61263	Bankers Life & Cas Co	IL	\$4,769,590	0.15%
91626	New England Life Ins Co	MA	\$38,778,630	1.24%	80926	Sun Life & Hlth Ins Co	CT	\$4,674,344	0.15%
65919	Primerica Life Ins Co	MA	\$36,138,063	1.16%	66842	AIG Life Ins Co	DE	\$4,653,072	0.15%
70211	Reassure Amer Life Ins Co	IN	\$35,164,085	1.13%	86509	Ing Life Ins & Ann Co	CT	\$4,538,560	0.15%
62235	Unum Life Ins Co Of Amer	ME	\$33,330,616	1.07%	71129	Fort Dearborn Life Ins Co	IL	\$4,509,415	0.14%
68322	Great W Life & Ann Ins Co	CO	\$32,917,219	1.05%	97136	Metropolitan Tower Life Ins Co	DE	\$4,342,386	0.14%
71153	Hartford Life & Ann Ins Co	CT	\$27,267,569	0.87%	67989	American Memorial Life Ins Co	SD	\$4,340,153	0.14%
66168	Minnesola Life Ins Co	MN	\$26,289,760	0.84%	65242	Lafayette Life Ins Co	IN	\$4,211,269	0.13%
62944	AXA Equitable Life Ins Co	NY	\$26,176,893	0.84%	70106	United States Life Ins Co In NYC	NY	\$4,175,363	0.13%
67814	Phoenix Life Ins Co	NY	\$25,979,877	0.83%	70408	Union Security Life Ins Co	IA	\$3,990,438	0.13%
65595	Lincoln Benefit Life Co	NE	\$25,810,058	0.83%	70939	Gerber Life Ins Co	NY	\$3,805,242	0.12%
68136	Protective Life Ins Co	TN	\$25,520,893	0.82%	68195	Provident Life & Accident Ins Co	TN	\$3,702,574	0.12%
69868	United Of Omaha Life Ins Co	NE	\$24,081,624	0.77%	62065	Colonial Penn Life Ins Co	PA	\$3,574,164	0.11%
61271	Principal Life Ins Co	IA	\$21,705,287	0.69%	65056	Jackson Natl Life Ins Co	MI	\$3,519,854	0.11%
63665	General Amer Life Ins Co	MO	\$21,519,341	0.69%	60186	Allstate Life Ins Co	IL	\$3,495,257	0.11%
80314	Unicare Life & Health Ins Co	IN	\$20,793,326	0.67%	68772	Security Mut Life Ins Co Of NY	NY	\$3,452,861	0.11%
70335	West Coast Life Ins Co	NE	\$20,671,731	0.66%	61999	Americo Fin Life & Ann Ins Co	TX	\$3,339,601	0.11%
65315	Liberty Life Assur Co Of Boston	MA	\$20,081,613	0.64%	65900	Conseco Life Ins Co	IN	\$3,199,401	0.10%
87726	MetLife Ins Co of CT	CT	\$19,928,943	0.64%	63126	Farm Family Life Ins Co	NY	\$3,089,907	0.10%
69345	Teachers Ins & Ann Assoc Of Amer	NY	\$19,674,406	0.63%	64513	Horace Mann Life Ins Co	IL	\$2,791,368	0.09%
62308	Connecticut Gen Life Ins Co	CT	\$19,469,000	0.62%	99937	Columbus Life Ins Co	OH	\$2,719,753	0.09%
66974	North Amer Co Life & Hlth Ins	IA	\$17,597,768	0.56%	78778	Guardian Ins & Ann Co Inc	DE	\$2,650,781	0.08%
94250	Banner Life Ins Co	MD	\$17,015,349	0.54%	60380	American Family Life Assur Co of Col	NE	\$2,509,008	0.08%
68713	Security Life Of Denver Ins Co	CO	\$16,912,014	0.54%	92657	Nationwide Life & Ann Ins Co	OH	\$2,453,554	0.08%
63274	OM Fin Life Ins Co	MD	\$16,645,652	0.53%	61360	Reliastar Life Ins Co Of NY	NY	\$2,434,106	0.08%
79065	Sun Life Assur Co Of Canada US	DE	\$15,117,473	0.48%	63495	First Investors Life Ins Co	NY	\$2,369,508	0.08%
69019	Standard Ins Co	OR	\$14,899,140	0.48%	68810	Sentry Life Ins Co	WI	\$2,350,216	0.08%
66044	Midland Natl Life Ins Co	IA	\$14,721,260	0.47%	60142	TIAA Cref Life Ins Co	NY	\$2,251,814	0.07%
60054	Aetna Life Ins Co	CT	\$14,667,461	0.47%	80659	US Business of Canada Life Assur Co	MI	\$2,188,564	0.07%
66869	Nationwide Life Ins Co	OH	\$12,790,407	0.41%	71854	AAA Life Ins Co	MI	\$2,170,693	0.07%
68381	Reliance Standard Life Ins Co	IL	\$12,085,581	0.39%	65927	Lincoln Heritage Life Ins Co	IL	\$2,154,744	0.07%
61425	Trustmark Ins Co	IL	\$11,832,299	0.38%	60038	Acacia Life Ins Co	DC	\$2,098,996	0.07%
69663	USAA Life Ins Co	TX	\$11,729,730	0.38%	72125	Physicians Life Ins Co	NE	\$2,093,574	0.07%
76023	Columbian Life Ins Co	IL	\$11,502,667	0.37%	61301	Ameritas Life Ins Corp	NE	\$2,069,211	0.07%
91413	Western Reserve Life Assur Co of OH	OH	\$10,898,997	0.35%	70416	MML Bay State Life Ins Co	CT	\$2,034,452	0.07%
65498	Life Ins Co Of N Amer	PA	\$10,729,248	0.34%	66427	MTL Ins Co	IL	\$2,002,225	0.06%
61689	Aviva Life & Ann Co	IA	\$9,571,929	0.31%	64327	Harleysville Life Ins Co	PA	\$1,960,558	0.06%
91642	Forethought Life Ins Co	IN	\$9,494,084	0.30%	66583	National Guardian Life Ins Co	WI	\$1,960,084	0.06%

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
93777	Household Life Ins Co	MI	\$1,956,286	0.06%	65021	Stonebridge Life Ins Co	VT	\$331,250	0.01%
71714	Berkshire Life Ins Co of Amer	MA	\$1,674,989	0.05%	67261	Old Republic Life Ins Co	IL	\$325,198	0.01%
62146	Combined Ins Co Of Amer	IL	\$1,425,563	0.05%	68608	Symetra Life Ins Co	WA	\$322,651	0.01%
61182	Aurora Natl Life Assur Co	CA	\$1,396,305	0.04%	68632	VantLife Ins Co	CT	\$317,969	0.01%
94099	United Investors Life Ins Co	MO	\$1,374,857	0.04%	68039	Presidential Life Ins Co	NY	\$301,028	0.01%
62251	Concord Heritage Life Ins Co Inc	NH	\$1,368,464	0.04%	70173	Universal Underwriters Life Ins Co	KS	\$290,058	0.01%
69744	Union Labor Life Ins Co	MD	\$1,328,833	0.04%	61212	Baltimore Life Ins Co	MD	\$282,429	0.01%
63312	Great Amer Life Ins Co	OH	\$1,319,799	0.04%	62553	Country Life Ins Co	IL	\$275,623	0.01%
60739	American Natl Ins Co	TX	\$1,261,469	0.04%	67601	Paul Revere Variable Ann Ins Co	MA	\$268,263	0.01%
61492	Liberty Life Ins Co	SC	\$1,231,891	0.04%	60410	American Fidelity Assur Co	OK	\$266,712	0.01%
69116	State Life Ins Co	IN	\$1,230,494	0.04%	62057	Lincoln Life & Ann Co of NY	NY	\$265,337	0.01%
70319	Washington Natl Ins Co	IL	\$1,203,235	0.04%	65781	Madison Natl Life Ins Co Inc	WI	\$250,095	0.01%
60534	American Heritage Life Ins Co	FL	\$1,168,117	0.04%	64017	Jefferson Natl Life Ins Co	TX	\$249,861	0.01%
60607	American Intl Life Assur Co of NY	NY	\$1,143,647	0.04%	60003	Park Avenue Life Ins Co	DE	\$249,190	0.01%
62413	Continental Assur Co	IL	\$1,127,648	0.04%	63053	Family Life Ins Co	TX	\$248,480	0.01%
69140	First AllAmerica Fin Life Ins Co	MA	\$1,084,780	0.03%	80705	US Br Great West Life Assur Co	MI	\$246,829	0.01%
67598	Paul Revere Life Ins Co	MA	\$1,080,552	0.03%	70114	Unity Mut Life Ins Co	NY	\$243,593	0.01%
61409	National Benefit Life Ins Co	NY	\$1,051,820	0.03%	87645	United Fidelity Life Ins Co	TX	\$240,798	0.01%
63290	Fidelity Life Assn A Legal Reserve L	IL	\$1,022,342	0.03%	61069	Anthem Life Ins Co	IN	\$234,378	0.01%
65528	Life Ins Co Of The Southwest	TX	\$1,018,375	0.03%	79022	Merrill Lynch Life Ins Co	AR	\$231,075	0.01%
67180	Ohio State Life Ins Co	TX	\$974,062	0.03%	70580	Humanadental Ins Co	WI	\$227,909	0.01%
60275	American Bankers Life Assur Co Of FL	FL	\$942,831	0.03%	65870	Manhattan Life Ins Co	NY	\$215,524	0.01%
80675	US Business of Crown Life Ins Co	MI	\$904,900	0.03%	93610	John Hancock Life & Hlth Ins Co	MA	\$215,523	0.01%
69914	Sears Life Ins Co	TX	\$901,100	0.03%	60216	Amalgamated Life Ins Co	NY	\$208,837	0.01%
62103	Columbian Mut Life Ins Co	NY	\$892,329	0.03%	70688	Transamerica Financial Life Ins Co	NY	\$206,049	0.01%
65331	Liberty Natl Life Ins Co	NE	\$883,267	0.03%	76236	Cincinnati Life Ins Co	OH	\$203,729	0.01%
67083	Manhattan Natl Life Ins Co	IL	\$855,022	0.03%	67199	Old Amer Ins Co	MO	\$203,188	0.01%
60941	AIG SunAmerica Life Assur Co	AZ	\$842,652	0.03%	63932	Aviva Life & Ann Co of NY	NY	\$202,144	0.01%
68675	Security Benefit Life Ins Co	KS	\$817,920	0.03%	66087	Mid West Natl Life Ins Co Of TN	TX	\$196,444	0.01%
69310	Surety Life Ins Co	NE	\$798,406	0.03%	65080	John Alden Life Ins Co	WI	\$188,230	0.01%
79413	UnitedHealthcare Ins Co	CT	\$781,654	0.03%	84654	US Branch Assumption Mut Life Ins Co	MA	\$186,605	0.01%
67172	Ohio Natl Life Ins Co	OH	\$767,319	0.02%	80624	American Progressive L&H Ins Of NY	NY	\$167,991	0.01%
81353	NYLIFE Ins Co Of AZ	AZ	\$760,021	0.02%	92916	United American Ins Co	NE	\$163,463	0.01%
77879	5 Star Life Ins Co	LA	\$744,203	0.02%	90557	Kemper Investors Life Ins Co	IL	\$161,449	0.01%
64211	Guarantee Trust Life Ins Co	IL	\$740,772	0.02%	71870	Fidelity Security Life Ins Co	MO	\$143,343	0.00%
64505	Homesteaders Life Co	IA	\$716,930	0.02%	80942	ING USA Ann & Life Ins Co	IA	\$143,027	0.00%
60518	American Hlth & Life Ins Co	TX	\$705,825	0.02%	66672	American Gen Life & Acc Ins Co	TN	\$130,716	0.00%
69477	Time Ins Co	WI	\$678,332	0.02%	60183	S USA Life Ins Co Inc	AZ	\$127,744	0.00%
62596	Union Fidelity Life Ins Co	IL	\$671,317	0.02%	60429	American Fidelity Life Ins Co	FL	\$125,810	0.00%
93262	Penn Ins & Ann Co	DE	\$651,386	0.02%	68160	Balboa Life Ins Co	CA	\$125,024	0.00%
62880	AXA Equitable Life & Ann Co	CO	\$647,200	0.02%	93513	MetLife Investors Ins Co	MO	\$119,260	0.00%
63657	Garden State Life Ins Co	TX	\$620,543	0.02%	69566	Trans World Assur Co	CA	\$114,726	0.00%
97055	Mega Life & Hlth Ins Co The	OK	\$588,594	0.02%	93742	Securian Life Ins Co	MN	\$112,562	0.00%
68373	American Gen Assur Co	IL	\$586,356	0.02%	66265	Monarch Life Ins Co	MA	\$110,341	0.00%
71439	Assurity Life Ins Co	NE	\$559,103	0.02%	62359	Constitution Life Ins Co	TX	\$109,880	0.00%
60704	Wilton Reassurance Life Co of NY	NY	\$523,455	0.02%	84786	Colorado Bankers Life Ins Co	CO	\$104,833	0.00%
80985	BCS Life Ins Co	IL	\$522,603	0.02%	60682	Conseco Ins Co	IL	\$100,440	0.00%
63967	Government Personnel Mut Life Ins Co	TX	\$516,645	0.02%	65722	Loyal Amer Life Ins Co	OH	\$99,774	0.00%
62286	Golden Rule Ins Co	IN	\$511,329	0.02%	88668	Mutual Of Amer Life Ins Co	NY	\$93,530	0.00%
61751	Central States H & L Co Of Omaha	NE	\$502,887	0.02%	94358	USABLE Life	AR	\$87,688	0.00%
67660	Pennsylvania Life Ins Co	PA	\$502,172	0.02%	81442	Monitor Life Ins Co Of NY	NY	\$83,841	0.00%
60895	American United Life Ins Co	IN	\$476,001	0.02%	92738	American Equity Invest Life Ins Co	IA	\$81,815	0.00%
63487	Investors Life Ins Co N Amer	TX	\$475,942	0.02%	67148	Occidental Life Ins Co Of NC	TX	\$80,738	0.00%
71455	Cardif Life Ins Co	KS	\$473,157	0.02%	62634	Delaware Amer Life Ins Co	DE	\$80,041	0.00%
65129	Kansas City Life Ins Co	MO	\$423,536	0.01%	62928	EMC Natl Life Co	IA	\$79,708	0.00%
64580	Illinois Mut Life Ins Co	IL	\$416,584	0.01%	69256	Sunamerica Life Ins Co	AZ	\$76,397	0.00%
69396	Texas Life Ins Co	TX	\$399,829	0.01%	77828	Companion Life Ins Co	SC	\$67,210	0.00%
63177	Farmers New World Life Ins Co	WA	\$387,162	0.01%	88536	Protective Life And Annuity Ins Co	AL	\$63,203	0.00%
61832	Chesapeake Life Ins Co	OK	\$385,380	0.01%	92622	Western Southern Life Assur Co	OH	\$57,151	0.00%
63258	Federated Life Ins Co	MN	\$381,454	0.01%	67873	Pioneer Amer Ins Co	TX	\$56,214	0.00%
90212	Great Southern Life Ins Co	TX	\$376,839	0.01%	70432	AIG Ann Ins Co	TX	\$53,357	0.00%



			Premium Written in MA as of	Market Share in MA as of				Premium Written in MA as of	Market Share in MA as of
NAIC #	Company Name	State	12/31/2008	12/31/2008	NAIC #	Company Name	State	12/31/2008	12/31/2008
81264	Nippon Life Ins Co Of Amer	IA	\$52,751	0.00%	69051	Standard Life Ins Co Of IN	IN	\$733	0.00%
65110	Kanawha Ins Co	SC	\$49,631	0.00%	63479	United Teacher Assoc Ins Co	TX	\$515	0.00%
61883	Central United Life Ins Co	AR	\$49,597	0.00%	74780	Integrity Life Ins Co	OH	\$419	0.00%
66850	National Western Life Ins Co	CO	\$49,007	0.00%	61727	Central Reserve Life Ins Co	OH	\$322	0.00%
68209	Provident Life & Cas Ins Co	TN	\$48,450	0.00%	60305	American Comm Mut Ins Co	MI	\$243	0.00%
70750	Nationwide Life & Ann Co of Amer	DE	\$48,117	0.00%	60801	American Public Life Ins Co	OK	\$114	0.00%
90328	First Hlth Life & Hlth Ins Co	TX	\$44,733	0.00%	67784	Philadelphia Amer Life Ins Co	TX	\$113	0.00%
60836	American Republic Ins Co	IA	\$40,616	0.00%	82538	National Hlth Ins Co	TX	\$108	0.00%
76325	Senior Hlth Ins Co of PA	PA	\$33,456	0.00%	91693	IA Amer Life Ins Co	GA	\$104	0.00%
61395	Beneficial Life Ins Co	UT	\$31,036	0.00%	71323	Zale Life Ins Co	AZ	\$92	0.00%
86371	Ullico Life Ins Co	TX	\$23,957	0.00%	60631	American Investors Life Ins Co	KS	\$79	0.00%
62383	Centurion Life Ins Co	IA	\$20,537	0.00%	71471	Medico Life Ins Co	NE	\$66	0.00%
73288	Humana Ins Co	WI	\$19,801	0.00%	Total Direct Written Premium\$3,123,730,941100.00%				
97764	Idealife Ins Co	CT	\$17,914	0.00%					
71773	American Natl Life Ins Co Of TX	TX	\$17,085	0.00%					
72850	United World Life Ins Co	NE	\$16,512	0.00%					
86630	Prudential Ann Life Assur Corp	CT	\$14,590	0.00%					
65951	Merit Life Ins Co	IN	\$14,442	0.00%					
69272	Sunset Life Ins Co Of Amer	MO	\$13,294	0.00%					
81060	Canada Life Ins Co Of Amer	MI	\$12,547	0.00%					
69078	Standard Security Life Ins Co Of NY	NY	\$11,221	0.00%					
80799	Celtic Ins Co	IL	\$10,942	0.00%					
70130	Universal Guaranty Life Ins Co	OH	\$9,867	0.00%					
67539	Pan Amer Life Ins Co	LA	\$9,614	0.00%					
92711	HCC Life Ins Co	IN	\$9,222	0.00%					
71404	Continental Gen Ins Co	OH	\$8,613	0.00%					
67911	Pioneer Mut Life Ins Co	ND	\$7,841	0.00%					
97241	Settlers Life Ins Co	WI	\$6,998	0.00%					
66109	Midwestern United Life Ins Co	IN	\$6,868	0.00%					
63819	Unity Financial Life Ins Co	PA	\$6,780	0.00%					
68284	Pyramid Life Ins Co	KS	\$6,668	0.00%					
62421	Heritage Union Life Ins Co	AZ	\$6,510	0.00%					
86355	Standard Life & Accident Ins Co	OK	\$5,986	0.00%					
69930	United Ins Co Of Amer	IL	\$5,715	0.00%					
64831	Intramercia Life Ins Co	NY	\$5,449	0.00%					
62510	Equitrust Life Ins Co	IA	\$5,227	0.00%					
94218	Country Investors Life Assur Co	IL	\$5,139	0.00%					
97268	Pacific Life & Ann Co	AZ	\$4,850	0.00%					
60445	Sagicor Life Ins Co	TX	\$4,028	0.00%					
68357	Reliable Life Ins Co	MO	\$3,510	0.00%					
67369	Alta Hlth & Life Ins Co	IN	\$2,578	0.00%					
68721	Security Life Ins Co Of Amer	MN	\$2,268	0.00%					
11121	Unified Life Ins Co	TX	\$2,209	0.00%					
61735	Central Security Life Ins Co	TX	\$1,725	0.00%					
86126	Members Life Ins Co	IA	\$1,704	0.00%					
68047	Professional Ins Co	TX	\$1,655	0.00%					
84514	Industrial Alliance Pacific Ins & Fi	WA	\$1,584	0.00%					
61239	Bankers Fidelity Life Ins Co	GA	\$1,373	0.00%					
62863	Trustmark Life Ins Co	IL	\$1,305	0.00%					
89184	Sterling Investors Life Ins Co	GA	\$909	0.00%					
76112	Oxford Life Ins Co	AZ	\$892	0.00%					
60232	AGL Life Assur Co	PA	\$871	0.00%					
62952	Equitable Life & Cas Ins Co	UT	\$855	0.00%					

## 2008 Premium and Market Share - LIFE ALL LINES

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
65978	Metropolitan Life Ins Co	NY	\$1,083,236,223	6.26%	66044	Midland Natl Life Ins Co	IA	\$47,579,742	0.27%
65935	Massachusetts Mut Life Ins Co	MA	\$916,059,860	5.29%	66168	Minnesota Life Ins Co	MN	\$44,531,301	0.26%
69345	Teachers Ins & Ann Assoc Of Amer	NY	\$823,776,051	4.76%	68381	Reliance Standard Life Ins Co	IL	\$44,423,121	0.26%
65838	John Hancock Life Ins Co (USA)	MI	\$726,279,236	4.20%	65595	Lincoln Benefit Life Co	NE	\$44,027,704	0.25%
65099	John Hancock Life Ins Co	MA	\$587,419,423	3.39%	97055	Mega Life & Hlth Ins Co The	OK	\$43,717,810	0.25%
79413	UnitedHealthcare Ins Co	CT	\$536,827,329	3.10%	69868	United Of Omaha Life Ins Co	NE	\$40,912,648	0.24%
91596	New York Life Ins & Ann Corp	DE	\$532,279,966	3.07%	78778	Guardian Ins & Ann Co Inc	DE	\$40,485,727	0.23%
68241	Prudential Ins Co Of Amer	NJ	\$519,444,714	3.00%	62510	Equitrust Life Ins Co	IA	\$38,941,419	0.22%
65676	Lincoln Natl Life Ins Co	IN	\$481,934,539	2.78%	67172	Ohio Natl Life Ins Co	OH	\$38,421,519	0.22%
67466	Pacific Life Ins Co	NE	\$459,714,660	2.66%	63274	OM Fin Life Ins Co	MD	\$37,997,666	0.22%
61689	Aviva Life & Ann Co	IA	\$406,100,315	2.35%	66141	Health Net Life Ins Co	CA	\$37,758,662	0.22%
88072	Hartford Life Ins Co	CT	\$404,840,617	2.34%	67660	Pennsylvania Life Ins Co	PA	\$37,713,643	0.22%
86509	Ing Life Ins & Ann Co	CT	\$395,930,566	2.29%	70211	Reassure Amer Life Ins Co	IN	\$37,048,444	0.21%
65005	RiverSource Life Ins Co	MN	\$394,535,576	2.28%	66087	Mid West Natl Life Ins Co Of TN	TX	\$36,373,679	0.21%
66915	New York Life Ins Co	NY	\$368,333,718	2.13%	65919	Primerica Life Ins Co	MA	\$36,180,991	0.21%
80942	ING USA Ann & Life Ins Co	IA	\$340,318,214	1.97%	60895	American United Life Ins Co	IN	\$35,862,374	0.21%
62944	AXA Equitable Life Ins Co	NY	\$327,630,091	1.89%	68136	Protective Life Ins Co	TN	\$34,955,309	0.20%
66869	Nationwide Life Ins Co	OH	\$314,508,522	1.82%	88668	Mutual Of Amer Life Ins Co	NY	\$34,698,916	0.20%
70025	Genworth Life Ins Co	DE	\$299,483,886	1.73%	62049	Colonial Life & Accident Ins Co	SC	\$32,649,696	0.19%
67091	Northwestern Mut Life Ins Co	WI	\$275,755,059	1.59%	92738	American Equity Invest Life Ins Co	IA	\$30,974,156	0.18%
61050	MetLife Investors USA Ins Co	DE	\$273,291,428	1.58%	60380	American Family Life Assur Co of Col	NE	\$30,880,344	0.18%
86231	Transamerica Life Ins Co	IA	\$248,683,434	1.44%	69663	USAA Life Ins Co	TX	\$30,271,057	0.17%
64246	Guardian Life Ins Co Of Amer	NY	\$248,262,654	1.43%	71129	Fort Dearborn Life Ins Co	IL	\$30,031,203	0.17%
65056	Jackson Natl Life Ins Co	MI	\$242,440,402	1.40%	68195	Provident Life & Accident Ins Co	TN	\$29,076,158	0.17%
79065	Sun Life Assur Co Of Canada US	DE	\$221,656,963	1.28%	90328	First Hlth Life & Hlth Ins Co	TX	\$29,015,670	0.17%
61271	Principal Life Ins Co	IA	\$211,396,222	1.22%	62626	Cuna Mut Ins Society	IA	\$28,672,558	0.17%
93696	Fidelity Investments Life Ins Co	UT	\$197,231,362	1.14%	60186	Allstate Life Ins Co	IL	\$27,537,664	0.16%
91626	New England Life Ins Co	MA	\$193,068,628	1.12%	93513	MetLife Investors Ins Co	MO	\$26,678,533	0.15%
90611	Allianz Life Ins Co Of N Amer	MN	\$192,774,474	1.11%	62146	Combined Ins Co Of Amer	IL	\$26,643,684	0.15%
87726	MetLife Ins Co of CT	CT	\$191,126,724	1.10%	67814	Phoenix Life Ins Co	NY	\$26,641,125	0.15%
60054	Aetna Life Ins Co	CT	\$182,767,757	1.06%	63312	Great Amer Life Ins Co	OH	\$25,111,052	0.15%
62235	Unum Life Ins Co Of Amer	ME	\$180,427,863	1.04%	80837	Union Central Life Ins Co	OH	\$24,902,194	0.14%
70435	The Savings Bank Life Ins Co Of MA	MA	\$170,087,472	0.98%	68608	Symetra Life Ins Co	WA	\$24,204,504	0.14%
71153	Hartford Life & Ann Ins Co	CT	\$164,972,959	0.95%	70335	West Coast Life Ins Co	NE	\$23,437,475	0.14%
62308	Connecticut Gen Life Ins Co	CT	\$144,042,218	0.83%	92711	HCC Life Ins Co	IN	\$22,960,625	0.13%
70688	Transamerica Financial Life Ins Co	NY	\$137,882,044	0.80%	93548	PHL Variable Ins Co	CT	\$22,759,720	0.13%
68322	Great W Life & Ann Ins Co	CO	\$135,389,446	0.78%	63665	General Amer Life Ins Co	MO	\$22,430,857	0.13%
70815	Hartford Life & Accident Ins Co	CT	\$133,823,820	0.77%	91413	Western Reserve Life Assur Co of OH	OH	\$20,113,372	0.12%
65536	Genworth Life & Ann Ins Co	VA	\$131,623,300	0.76%	61425	Trustmark Ins Co	IL	\$19,950,631	0.12%
60631	American Investors Life Ins Co	KS	\$127,929,475	0.74%	70408	Union Security Ins Co	IA	\$19,871,184	0.11%
70432	AIG Ann Ins Co	TX	\$112,365,529	0.65%	79022	Merill Lynch Life Ins Co	AR	\$18,744,546	0.11%
80314	Unicare Life & Health Ins Co	IN	\$110,378,043	0.64%	67644	Penn Mut Life Ins Co	PA	\$18,254,493	0.11%
86630	Prudential Ann Life Assur Corp	CT	\$101,911,263	0.59%	93440	HM Life Ins Co	PA	\$17,318,673	0.10%
79227	Pruco Life Ins Co	AZ	\$93,328,447	0.54%	94250	Banner Life Ins Co	MD	\$17,015,156	0.10%
60488	American Gen Life Ins Co	TX	\$85,305,270	0.49%	68713	Security Life Of Denver Ins Co	CO	\$16,912,013	0.10%
80802	US Br SunLife Assur Co Of Canada	MI	\$79,937,020	0.46%	66842	AIG Life Ins Co	DE	\$16,147,388	0.09%
61263	Bankers Life & Cas Co	IL	\$73,493,591	0.42%	65528	Life Ins Co Of The Southwest	TX	\$16,132,505	0.09%
93432	CM Life Ins Co	CT	\$72,343,607	0.42%	68675	Security Benefit Life Ins Co	KS	\$15,619,760	0.09%
73288	Humana Ins Co	WI	\$72,004,107	0.42%	80926	Sun Life & Hlth Ins Co	CT	\$15,540,889	0.09%
67105	Reliastar Life Ins Co	MN	\$69,030,613	0.40%	91642	Forethought Life Ins Co	IN	\$14,730,621	0.09%
66281	Monumental Life Ins Co	IA	\$67,992,328	0.39%	74780	Integrity Life Ins Co	OH	\$14,448,562	0.08%
60739	American Natl Ins Co	TX	\$64,913,115	0.37%	67598	Paul Revere Life Ins Co	MA	\$13,791,128	0.08%
69019	Standard Ins Co	OR	\$64,209,123	0.37%	71714	Berkshire Life Ins Co of Amer	MA	\$13,778,220	0.08%
60941	AIG SunAmerica Life Assur Co	AZ	\$62,220,294	0.36%	60142	TIAA Cref Life Ins Co	NY	\$13,503,688	0.08%
65315	Liberty Life Assur Co Of Boston	MA	\$59,164,654	0.34%	70106	United States Life Ins Co In NYC	NY	\$12,425,287	0.07%
66974	North Amer Co Life & Hlth Ins	IA	\$57,837,584	0.33%	76023	Columbian Life Ins Co	IL	\$11,538,255	0.07%
70238	Variable Annuity Life Ins Co	TX	\$57,013,485	0.33%	61301	Ameritas Life Ins Corp	NE	\$11,338,914	0.07%
65498	Life Ins Co Of N Amer	PA	\$55,482,646	0.32%	64513	Horace Mann Life Ins Co	IL	\$10,689,984	0.06%
90204	John Hancock Variable Life Ins Co	MA	\$53,089,690	0.31%	66680	National Life Ins Co	VT	\$10,435,829	0.06%
61476	Boston Mut Life Ins Co	MA	\$48,444,232	0.28%	61999	Americo Fin Life & Ann Ins Co	TX	\$9,674,631	0.06%



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72222	Amica Life Ins Co	RI	\$9,257,565	0.05%	80985	BCS Life Ins Co	IL	\$1,848,939	0.01%
91472	Globe Life & Accident Ins Co	NE	\$8,958,998	0.05%	69744	Union Labor Life Ins Co	MD	\$1,836,468	0.01%
89206	Ohio Natl Life Assur Corp	OH	\$8,734,834	0.05%	68039	Presidential Life Ins Co	NY	\$1,718,176	0.01%
84824	Commonwealth Ann & Life Ins Co	MA	\$8,272,057	0.05%	60232	AGL Life Assur Co	PA	\$1,709,784	0.01%
65242	Lafayette Life Ins Co	IN	\$8,183,733	0.05%	69116	State Life Ins Co	IN	\$1,663,079	0.01%
80624	American Progressive L&H Ins Of NY	NY	\$7,669,497	0.04%	60518	American Hlth & Life Ins Co	TX	\$1,629,667	0.01%
84530	US Financial Life Ins Co	OH	\$7,503,997	0.04%	65781	Madison Natl Life Ins Co Inc	WI	\$1,570,537	0.01%
60577	American Income Life Ins Co	IN	\$7,410,847	0.04%	69140	First Allmerica Fin Life Ins Co	MA	\$1,549,073	0.01%
93661	Annuity Investors Life Ins Co	OH	\$7,261,151	0.04%	80896	Centre Life Ins Co	MA	\$1,543,198	0.01%
63126	Farm Family Life Ins Co	NY	\$7,175,888	0.04%	76112	Oxford Life Ins Co	AZ	\$1,503,631	0.01%
66370	Mony Life Ins Co	NY	\$7,079,498	0.04%	64580	Illinois Mut Life Ins Co	IL	\$1,412,521	0.01%
68772	Security Mut Life Ins Co Of NY	NY	\$7,074,368	0.04%	61182	Aurora Natl Life Assur Co	CA	\$1,396,305	0.01%
68810	Sentry Life Ins Co	WI	\$7,045,820	0.04%	94099	United Investors Life Ins Co	MO	\$1,376,437	0.01%
92916	United American Ins Co	NE	\$6,989,707	0.04%	60836	American Republic Ins Co	IA	\$1,373,757	0.01%
68225	Nationwide Life Ins Co of Amer	PA	\$6,914,205	0.04%	62863	Trustmark Life Ins Co	IL	\$1,349,130	0.01%
71870	Fidelity Security Life Ins Co	MO	\$6,744,739	0.04%	80705	US Br Great West Life Assur Co	MI	\$1,329,614	0.01%
65080	John Alden Life Ins Co	WI	\$6,337,549	0.04%	62286	Golden Rule Ins Co	IN	\$1,314,127	0.01%
67652	First Penn Pacific Life Ins Co	IN	\$6,311,783	0.04%	61751	Central States H & L Co Of Omaha	NE	\$1,295,297	0.01%
64017	Jefferson Natl Life Ins Co	TX	\$6,160,102	0.04%	93629	Prudential Retirement Ins & Anuty Co	CT	\$1,281,061	0.01%
78077	Mony Life Ins Co Of Amer	AZ	\$5,858,183	0.03%	92622	Western Southern Life Assur Co	OH	\$1,231,909	0.01%
77828	Companion Life Ins Co	SC	\$5,698,166	0.03%	71455	Cardif Life Ins Co	KS	\$1,211,210	0.01%
70939	Gerber Life Ins Co	NY	\$5,649,275	0.03%	66265	Monarch Life Ins Co	MA	\$1,210,285	0.01%
61492	Liberty Life Ins Co	SC	\$5,286,847	0.03%	60607	American Intl Life Assur Co of NY	NY	\$1,204,727	0.01%
60534	American Heritage Life Ins Co	FL	\$5,148,914	0.03%	80578	Physicians Mut Ins Co	NE	\$1,167,429	0.01%
71412	Mutual Of Omaha Ins Co	NE	\$5,001,161	0.03%	62413	Continental Assur Co	IL	\$1,134,662	0.01%
63932	Aviva Life & Ann Co of NY	NY	\$4,935,710	0.03%	85561	Perico Life Ins Co	DE	\$1,112,997	0.01%
67989	American Memorial Life Ins Co	SD	\$4,355,899	0.03%	66850	National Western Life Ins Co	CO	\$1,106,400	0.01%
97136	Metropolitan Tower Life Ins Co	DE	\$4,348,586	0.03%	62596	Union Fidelity Life Ins Co	IL	\$1,105,325	0.01%
65021	Stonebridge Life Ins Co	VT	\$4,011,041	0.02%	61409	National Benefit Life Ins Co	NY	\$1,072,138	0.01%
92657	Nationwide Life & Ann Ins Co	OH	\$3,700,112	0.02%	80675	US Business of Crown Life Ins Co	MI	\$1,032,070	0.01%
93777	Household Life Ins Co	MI	\$3,645,116	0.02%	63290	Fidelity Life Assn A Legal Reserve L	IL	\$1,022,342	0.01%
62065	Colonial Penn Life Ins Co	PA	\$3,590,060	0.02%	68209	Provident Life & Cas Ins Co	TN	\$1,016,422	0.01%
64327	Harleysville Life Ins Co	PA	\$3,578,240	0.02%	67180	Ohio State Life Ins Co	TX	\$974,062	0.01%
65110	Kanawha Ins Co	SC	\$3,542,956	0.02%	93262	Penn Ins & Ann Co	DE	\$937,975	0.01%
69000	Northwestern Long Term Care Ins Co	WI	\$3,514,945	0.02%	62103	Columbian Mut Life Ins Co	NY	\$916,240	0.01%
60410	American Fidelity Assur Co	OK	\$3,310,805	0.02%	65331	Liberty Natl Life Ins Co	NE	\$895,451	0.01%
65900	Conseco Life Ins Co	IN	\$3,253,353	0.02%	67083	Manhattan Natl Life Ins Co	IL	\$855,037	0.00%
69477	Time Ins Co	WI	\$3,163,586	0.02%	60526	American Family Life Assur Co of NY	NY	\$826,959	0.00%
90557	Kemper Investors Life Ins Co	IL	\$3,099,939	0.02%	61832	Chesapeake Life Ins Co	OK	\$821,313	0.00%
91529	Unimerica Ins Co	WI	\$3,082,266	0.02%	69310	Surety Life Ins Co	NE	\$801,543	0.00%
71439	Assurity Life Ins Co	NE	\$2,986,413	0.02%	68373	American Gen Assur Co	IL	\$786,115	0.00%
61360	Reliastar Life Ins Co Of NY	NY	\$2,948,202	0.02%	71730	Continental Amer Ins Co	SC	\$783,784	0.00%
99937	Columbus Life Ins Co	OH	\$2,869,586	0.02%	81353	NYLife Ins Co Of AZ	AZ	\$760,021	0.00%
80659	US Business of Canada Life Assur Co	MI	\$2,763,127	0.02%	60682	Conseco Ins Co	IL	\$753,603	0.00%
70319	Washington Natl Ins Co	IL	\$2,737,497	0.02%	77879	5 Star Life Ins Co	LA	\$744,203	0.00%
71854	AAA Life Ins Co	MI	\$2,569,138	0.01%	64505	Homesleaders Life Co	IA	\$732,340	0.00%
62251	Concord Heritage Life Ins Co Inc	NH	\$2,566,571	0.01%	65129	Kansas City Life Ins Co	MO	\$705,668	0.00%
66583	National Guardian Life Ins Co	WI	\$2,510,801	0.01%	63967	Government Personnel Mut Life Ins Co	TX	\$680,787	0.00%
65722	Loyal Amer Life Ins Co	OH	\$2,509,346	0.01%	62880	AXA Equitable Life & Ann Co	CO	\$647,200	0.00%
63495	First Investors Life Ins Co	NY	\$2,458,035	0.01%	69515	Medamerica Ins Co	PA	\$627,721	0.00%
60038	Acacia Life Ins Co	DC	\$2,194,784	0.01%	63657	Garden State Life Ins Co	TX	\$621,681	0.00%
65927	Lincoln Heritage Life Ins Co	IL	\$2,165,960	0.01%	63258	Federated Life Ins Co	MN	\$612,581	0.00%
69078	Standard Security Life Ins Co Of NY	NY	\$2,133,907	0.01%	82538	National Hlth Ins Co	TX	\$590,262	0.00%
64211	Guarantee Trust Life Ins Co	IL	\$2,103,565	0.01%	60704	Wilton Reassurance Life Co of NY	NY	\$551,245	0.00%
76325	Senior Hlth Ins Co of PA	PA	\$2,103,529	0.01%	69051	Standard Life Ins Co Of IN	IN	\$516,000	0.00%
60275	American Bankers Life Assur Co Of FL	FL	\$2,097,222	0.01%	70580	Humanadental Ins Co	WI	\$486,726	0.00%
72125	Physicians Life Ins Co	NE	\$2,095,298	0.01%	63487	Investors Life Ins Co N Amer	TX	\$480,521	0.00%
66427	MTL Ins Co	IL	\$2,081,286	0.01%	68160	Balboa Life Ins Co	CA	\$466,909	0.00%
62057	Lincoln Life & Ann Co of NY	NY	\$2,059,974	0.01%	61069	Anthem Life Ins Co	IN	\$428,845	0.00%
70416	MML Bay State Life Ins Co	CT	\$2,034,452	0.01%	61212	Baltimore Life Ins Co	MD	\$415,952	0.00%
69914	Sears Life Ins Co	TX	\$2,012,129	0.01%	62553	Country Life Ins Co	IL	\$415,288	0.00%

			Premium Written in MA as of	Market Share in MA as of				Premium Written in MA as of	Market Share in MA as of	
NAIC #	Company Name	State	12/31/2008	12/31/2008	NAIC #	Company Name	State	12/31/2008	12/31/2008	
90212	Great Southern Life Ins Co	TX	\$406,626	0.00%	81060	Canada Life Ins Co Of Amer	MI	\$25,548	0.00%	
69396	Texas Life Ins Co	TX	\$399,829	0.00%	86371	Ullico Life Ins Co	TX	\$23,957	0.00%	
81426	Commercial Travelers Mut Ins Co	NY	\$397,480	0.00%	81213	American Maturity Life Ins Co	CT	\$23,003	0.00%	
63177	Farmers New World Life Ins Co	WA	\$392,954	0.00%	60801	American Public Life Ins Co	OK	\$22,791	0.00%	
68632	VantisLife Ins Co	CT	\$388,027	0.00%	61808	Charter Natl Life Ins Co	IL	\$21,550	0.00%	
67261	Old Republic Life Ins Co	IL	\$325,234	0.00%	77968	Family Heritage Life Ins Co Of Amer	OH	\$20,881	0.00%	
94358	USable Life	AR	\$310,818	0.00%	62952	Equitable Life & Cas Ins Co	UT	\$19,157	0.00%	
67539	Pan Amer Life Ins Co	LA	\$300,376	0.00%	81434	First Rehab Life Ins Co Of Amer	NY	\$15,237	0.00%	
70114	Unity Mut Life Ins Co	NY	\$297,760	0.00%	69272	Sunset Life Ins Co Of Amer	MO	\$13,294	0.00%	
68047	Professional Ins Co	TX	\$286,371	0.00%	67784	Philadelphia Amer Life Ins Co	TX	\$10,607	0.00%	
67601	Paul Revere Variable Ann Ins Co	MA	\$268,263	0.00%	70130	Universal Guaranty Life Ins Co	OH	\$10,027	0.00%	
69256	Sunamerica Life Ins Co	AZ	\$250,216	0.00%	67911	Pioneer Mut Life Ins Co	ND	\$7,841	0.00%	
60003	Park Avenue Life Ins Co	DE	\$249,190	0.00%	97241	Settlers Life Ins Co	WI	\$6,998	0.00%	
63053	Family Life Ins Co	TX	\$248,480	0.00%	66109	Midwestern United Life Ins Co	IN	\$6,868	0.00%	
87645	United Fidelity Life Ins Co	TX	\$242,564	0.00%	67903	Provident Amer Life & Hlth Ins Co	OH	\$6,818	0.00%	
70173	Universal Underwriters Life Ins Co	KS	\$239,993	0.00%	63819	Unity Financial Life Ins Co	PA	\$6,780	0.00%	
62345	Berkshire Hathaway Life Ins Co NE	NE	\$229,844	0.00%	62421	Heritage Union Life Ins Co	AZ	\$6,510	0.00%	
97268	Pacific Life & Ann Co	AZ	\$217,693	0.00%	69930	United Ins Co Of Amer	IL	\$5,834	0.00%	
65870	Manhattan Life Ins Co	NY	\$216,688	0.00%	64831	Intramercia Life Ins Co	NY	\$5,525	0.00%	
67199	Old Amer Ins Co	MO	\$215,623	0.00%	94218	Country Investors Life Assur Co	IL	\$5,139	0.00%	
93610	John Hancock Life & Hlth Ins Co	MA	\$215,523	0.00%	31119	Medico Ins Co	NE	\$5,060	0.00%	
60216	Amalgamated Life Ins Co	NY	\$208,837	0.00%	89184	Sterling Investors Life Ins Co	GA	\$3,677	0.00%	
76236	Cincinnati Life Ins Co	OH	\$206,734	0.00%	68357	Reliable Life Ins Co	MO	\$3,530	0.00%	
84654	US Branch Assumption Mut Life Ins Co	MA	\$199,148	0.00%	61727	Central Reserve Life Ins Co	OH	\$1,951	0.00%	
71773	American Natl Life Ins Co Of TX	TX	\$189,954	0.00%	61735	Central Security Life Ins Co	TX	\$1,798	0.00%	
68721	Security Life Ins Co Of Amer	MN	\$188,264	0.00%	86126	Members Life Ins Co	IA	\$1,730	0.00%	
71404	Continental Gen Ins Co	OH	\$179,865	0.00%	84514	Industrial Alliance Pacific Ins & Fi	WA	\$1,584	0.00%	
60429	American Fidelity Life Ins Co	FL	\$161,582	0.00%	70866	Allstate Assur Co	IL	\$1,500	0.00%	
67369	Alta Hlth & Life Ins Co	IN	\$146,297	0.00%	71323	Zale Life Ins Co	AZ	\$247	0.00%	
66672	American Gen Life & Acc Ins Co	TN	\$145,706	0.00%	60305	American Comm Mut Ins Co	MI	\$243	0.00%	
62359	Constitution Life Ins Co	TX	\$142,486	0.00%	71471	Medico Life Ins Co	NE	\$205	0.00%	
84786	Colorado Bankers Life Ins Co	CO	\$139,558	0.00%	91693	IA Amer Life Ins Co	GA	\$113	0.00%	
80799	Celtic Ins Co	IL	\$132,564	0.00%	Total Direct Written Premium				\$17,310,616,512	100.00%
60183	S USA Life Ins Co Inc	AZ	\$127,744	0.00%						
64939	Investors Ins Corp	DE	\$126,320	0.00%						
93742	Securian Life Ins Co	MN	\$117,040	0.00%						
86355	Standard Life & Accident Ins Co	OK	\$116,404	0.00%						
69566	Trans World Assur Co	CA	\$114,846	0.00%						
61883	Central United Life Ins Co	AR	\$95,026	0.00%						
62634	Delaware Amer Life Ins Co	DE	\$93,274	0.00%						
62928	EMC Natl Life Co	IA	\$89,386	0.00%						
67148	Occidental Life Ins Co Of NC	TX	\$86,057	0.00%						
81442	Monitor Life Ins Co Of NY	NY	\$83,841	0.00%						
76694	London Life Reins Co	PA	\$78,441	0.00%						
63479	United Teacher Assoc Ins Co	TX	\$72,008	0.00%						
70750	Nationwide Life & Ann Co of Amer	DE	\$68,352	0.00%						
88536	Protective Life And Annuity Ins Co	AL	\$63,321	0.00%						
72850	United World Life Ins Co	NE	\$62,327	0.00%						
60445	Sagcor Life Ins Co	TX	\$60,278	0.00%						
67873	Pioneer Amer Ins Co	TX	\$56,214	0.00%						
97764	Idealife Ins Co	CT	\$55,646	0.00%						
81078	American Ntwrk Ins Co	PA	\$54,096	0.00%						
81264	Nippon Life Ins Co Of Amer	IA	\$52,751	0.00%						
68284	Pyramid Life Ins Co	KS	\$52,099	0.00%						
70785	Pacificare Life & Hlth Ins Co	IN	\$48,396	0.00%						
61395	Beneficial Life Ins Co	UT	\$33,436	0.00%						
65951	Merit Life Ins Co	IN	\$32,867	0.00%						
61239	Bankers Fidelity Life Ins Co	GA	\$30,789	0.00%						
11121	Unified Life Ins Co	TX	\$28,988	0.00%						
62383	Centurion Life Ins Co	IA	\$26,416	0.00%						

## 2008 Premium and Market Share - LIFE \ OTHER FUNDS

	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
	65838	John Hancock Life Ins Co (USA)	MI	\$631,029,658	15.59%
	65099	John Hancock Life Ins Co	MA	\$434,460,947	10.73%
	65978	Metropolitan Life Ins Co	NY	\$432,193,762	10.68%
	65935	Massachusetts Mut Life Ins Co	MA	\$414,916,045	10.25%
	88072	Hartford Life Ins Co	CT	\$379,001,252	9.36%
	68241	Prudential Ins Co Of Amer	NJ	\$370,608,724	9.15%
	66869	Nationwide Life Ins Co	OH	\$270,857,718	6.69%
	67466	Pacific Life Ins Co	NE	\$248,100,000	6.13%
	66915	New York Life Ins Co	NY	\$246,433,116	6.09%
	70025	Genworth Life Ins Co	DE	\$209,000,000	5.16%
	71153	Hartford Life & Ann Ins Co	CT	\$136,065,043	3.36%
	86231	Transamerica Life Ins Co	IA	\$121,460,234	3.00%
	70688	Transamerica Financial Life Ins Co	NY	\$37,812,945	0.93%
	66281	Monumental Life Ins Co	IA	\$35,825,889	0.88%
	88668	Mutual Of Amer Life Ins Co	NY	\$34,561,286	0.85%
	86509	Ing Life Ins & Ann Co	CT	\$11,539,052	0.29%
	66168	Minnesota Life Ins Co	MN	\$8,909,193	0.22%
	67644	Penn Mut Life Ins Co	PA	\$8,350,065	0.21%
	62944	AXA Equitable Life Ins Co	NY	\$6,637,544	0.16%
	91626	New England Life Ins Co	MA	\$3,502,297	0.09%
	69019	Standard Ins Co	OR	\$2,020,286	0.05%
	65536	Genworth Life & Ann Ins Co	VA	\$2,000,000	0.05%
	92657	Nationwide Life & Ann Ins Co	OH	\$1,246,558	0.03%
	93629	Prudential Retirement Ins & Anuty Co	CT	\$1,027,887	0.03%
	67172	Ohio Natl Life Ins Co	OH	\$339,736	0.01%
	93262	Penn Ins & Ann Co	DE	\$286,589	0.01%
	90204	John Hancock Variable Life Ins Co	MA	\$203,839	0.01%
	61271	Principal Life Ins Co	IA	\$122,645	0.00%
	78778	Guardian Ins & Ann Co Inc	DE	\$56,198	0.00%
	65129	Kansas City Life Ins Co	MO	\$30,000	0.00%
	69868	United Of Omaha Life Ins Co	NE	\$20,747	0.00%
	65781	Madison Natl Life Ins Co Inc	WI	\$11,516	0.00%
	81213	American Maturity Life Ins Co	CT	\$11,300	0.00%
	62553	Country Life Ins Co	IL	\$2,814	0.00%
	70815	Hartford Life & Accident Ins Co	CT	\$1,369	0.00%
	Total Direct Written Premium			\$4,048,646,254	100.00%

## 2008 Premium and Market Share - MEDICAL MALPRACTICE

	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
	10206	Medical Professional Mut Ins Co	MA	\$135,565,358	80.31%
	11843	Medical Protective Co	IN	\$12,254,362	7.26%
	20427	American Cas Co Of Reading PA	PA	\$6,153,911	3.65%
	15890	Connecticut Medical Ins Co	CT	\$3,619,595	2.14%
	14460	Podiatry Ins Co Of Amer A Mut Co	IL	\$2,173,290	1.29%
	22810	Chicago Ins Co	IL	\$1,971,628	1.17%
	10638	Proselect Ins Co	MA	\$1,867,518	1.11%
	15865	NCMIC Ins Co	IA	\$1,459,033	0.86%
	22667	Ace Amer Ins Co	PA	\$1,448,917	0.86%
	19445	National Union Fire Ins Co Of Pitts	PA	\$896,163	0.53%
	21970	OneBeacon Ins Co	PA	\$345,712	0.20%
	19380	American Home Assur Co	NY	\$304,303	0.18%
	10801	Fortress Ins Co	IL	\$146,848	0.09%
	23809	Granite State Ins Co	PA	\$118,830	0.07%
	19720	American Alt Ins Corp	DE	\$92,924	0.06%
	20443	Continental Cas Co	IL	\$91,463	0.05%
	21857	American Ins Co	OH	\$84,742	0.05%
	16624	Darwin Natl Assur Co	DE	\$62,192	0.04%
	13714	Pharmacists Mut Ins Co	IA	\$50,960	0.03%
	34495	Doctors Co An Interins Exch	CA	\$43,122	0.03%
	18619	Platte River Ins Co	NE	\$34,027	0.02%
	11991	National Cas Co	WI	\$6,436	0.00%
	18767	Church Mut Ins Co	WI	\$5,919	0.00%
	24732	General Ins Co Of Amer	WA	\$4,063	0.00%
	11127	Professional Solutions Ins Co	IA	\$3,661	0.00%
	10677	Cincinnati Ins Co	OH	\$738	0.00%
	25143	State Farm Fire And Cas Co	IL	\$647	0.00%
	Total Direct Written Premium			\$168,806,362	100.00%

## 2008 Premium and Market Share - MORTGAGE &amp; FINANCIAL GUARANTY

	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
	29858	Mortgage Guar Ins Corp	WI	\$37,345,508	25.77%
	38458	Genworth Mortgage Ins Corp	NC	\$18,633,714	12.86%
	18708	Ambac Assur Corp	WI	\$15,008,267	10.36%
	33790	Radian Guaranty Inc	PA	\$14,530,566	10.03%
	15873	United Gty Residential Ins Co	NC	\$14,507,292	10.01%
	27251	PMI Mortgage Ins Co	AZ	\$13,332,556	9.20%
	28452	Republic Mortgage Ins Co	NC	\$10,341,979	7.14%
	30180	Assured Guar Corp	MD	\$7,858,200	5.42%
	18287	Financial Security Assur Inc	NY	\$5,878,072	4.06%
	40266	CMG Mortgage Ins Co	WI	\$3,089,888	2.13%
	24350	Triad Guaranty Ins Corp	IL	\$1,413,988	0.98%
	20311	Syncora Guarantee Inc	NY	\$927,486	0.64%
	29823	Genworth Residential Mortgage Ins Co	NC	\$626,406	0.43%
	12041	MBIA Ins Corp	NY	\$522,286	0.36%
	36250	Radian Asset Assur Inc	NY	\$307,300	0.21%
	19038	Travelers Cas & Surety Co	CT	\$221,100	0.15%
	26999	United Guaranty Mtg Indem Co	NC	\$117,896	0.08%
	25658	Travelers Ind Co	CT	\$100,500	0.07%
	35289	Continental Ins Co	PA	\$67,000	0.05%
	29114	CMG Mortgage Assur Co	WI	\$63,271	0.04%
	18759	Verex Assure Inc	WI	\$2,264	0.00%
	18740	MGIC Ind Corp	WI	\$1,543	0.00%
	10682	MGIC Credit Assur Corp	WI	\$1,320	0.00%
	16675	Genworth Mortgage Ins Corp Of NC	NC	\$8	0.00%
	Total Direct Written Premium			\$144,898,410	100.00%

## 2008 Premium and Market Share - OCEAN &amp; INLAND MARINE

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
23043	Liberty Mut Ins Co	MA	\$36,667,633	10.35%	36145	Travelers Personal Security Ins Co	CT	\$1,569,615	0.44%
20443	Continental Cas Co	IL	\$21,544,002	6.08%	41360	Arbella Protection Ins Co	MA	\$1,569,558	0.44%
20281	Federal Ins Co	IN	\$18,868,323	5.33%	16535	Zurich American Ins Co	NY	\$1,466,433	0.41%
19445	National Union Fire Ins Co Of Pitts	PA	\$17,896,300	5.05%	31534	Citizens Ins Co Of Amer	MI	\$1,357,623	0.38%
38369	Northern Assur Co Of Amer	MA	\$10,792,624	3.05%	36463	Discover Prop & Cas Ins Co	IL	\$1,336,065	0.38%
25674	Travelers Property Cas Co Of Amer	CT	\$10,184,113	2.88%	23841	New Hampshire Ins Co	PA	\$1,212,499	0.34%
20346	Pacific Ind Co	WI	\$9,250,163	2.61%	37273	Axis Ins Co	IL	\$1,193,144	0.34%
21482	Factory Mut Ins Co	RI	\$7,758,725	2.19%	14206	Holyoke Mut Ins Co In Salem	MA	\$1,177,503	0.33%
22292	Hanover Ins Co	NH	\$7,252,443	2.05%	42307	Navigators Ins Co	NY	\$1,168,691	0.33%
19070	Standard Fire Ins Co	CT	\$7,049,168	1.99%	13803	Farm Family Cas Ins Co	NY	\$1,133,957	0.32%
24767	St Paul Fire & Marine Ins Co	MN	\$6,420,803	1.81%	21865	Associated Ind Corp	CA	\$1,014,113	0.29%
29874	North Amer Specialty Ins Co	NH	\$6,072,469	1.71%	11150	Arch Ins Co	MO	\$997,509	0.28%
20052	National Liab & Fire Ins Co	CT	\$5,986,152	1.69%	37257	Praetorian Ins Co	IL	\$987,857	0.28%
21873	Firemans Fund Ins Co	CA	\$5,930,713	1.67%	20702	Ace Fire Underwriters Ins Co	PA	\$960,091	0.27%
22136	Great Amer Ins Co of NY	NY	\$5,820,661	1.64%	15024	Preferred Mut Ins Co	NY	\$957,008	0.27%
20621	OneBeacon Amer Ins Co	MA	\$5,760,355	1.63%	19771	Cambridge Mut Fire Ins Co	MA	\$952,598	0.27%
19682	Hartford Fire In Co	CT	\$5,526,945	1.56%	20370	AXIS Reins Co	NY	\$951,365	0.27%
31325	Acadia Ins Co	NH	\$5,324,629	1.50%	42650	OneBeacon Midwest Ins Co	WI	\$780,938	0.22%
10952	Stonebridge Casualty Ins Co	OH	\$5,150,523	1.45%	39454	Safety Ins Co	MA	\$767,898	0.22%
27928	Amex Assur Co	IL	\$4,745,186	1.34%	12831	State Natl Ins Co Inc	TX	\$758,811	0.21%
10014	Affiliated Fm Ins Co	RI	\$4,660,273	1.32%	34789	AIG Centennial Ins Co	PA	\$742,191	0.21%
25623	Phoenix Ins Co	CT	\$4,407,800	1.24%	19615	American Reliable Ins Co	AZ	\$737,136	0.21%
23035	Liberty Mut Fire Ins Co	WI	\$4,402,591	1.24%	35300	Allianz Global Risks US Ins Co	CA	\$727,997	0.21%
19798	Merrimack Mut Fire Ins Co	MA	\$4,364,588	1.23%	22306	Massachusetts Bay Ins Co	NH	\$710,675	0.20%
19305	Assurance Co Of Amer	NY	\$4,350,902	1.23%	38970	Markel Ins Co	IL	\$696,864	0.20%
22667	Ace Amer Ins Co	PA	\$4,296,512	1.21%	23965	Norfolk & Dedham Mut Fire Ins Co	MA	\$662,758	0.19%
40274	Citation Ins Co	MA	\$3,920,583	1.11%	22713	Insurance Co of N Amer	PA	\$617,186	0.17%
19380	American Home Assur Co	NY	\$3,729,262	1.05%	19259	Selective Ins Co Of SC	IN	\$587,232	0.17%
37885	XL Specialty Ins Co	DE	\$3,437,892	0.97%	12154	Encompass Ins Co of MA	MA	\$580,637	0.16%
20303	Great Northern Ins Co	IN	\$3,277,678	0.93%	25844	Union Ins Co	IA	\$539,624	0.15%
10111	American Bankers Ins Co Of FL	FL	\$3,133,991	0.89%	14788	NGM Ins Co	FL	\$530,104	0.15%
17000	Arbella Mut Ins Co	MA	\$3,074,555	0.87%	13706	Dorchester Mut Ins Co	MA	\$518,476	0.15%
26565	Ohio Ind Co	OH	\$2,898,069	0.82%	42048	Diamond State Ins Co	IN	\$518,100	0.15%
24198	Peerless Ins Co	NH	\$2,606,995	0.74%	26492	Courtesy Ins Co	FL	\$506,877	0.14%
11630	Jefferson Ins Co	NY	\$2,513,321	0.71%	14192	Hingham Mut Fire Ins Co	MA	\$475,962	0.13%
20397	Vigilant Ins Co	NY	\$2,442,872	0.69%	16608	New York Marine & Gen Ins Co	NY	\$471,075	0.13%
23469	American Modern Home Ins Co	OH	\$2,421,361	0.68%	21970	OneBeacon Ins Co	PA	\$460,850	0.13%
32220	American Intl Ins Co	NY	\$2,407,043	0.68%	40320	Massachusetts Homeland Ins Co	MA	\$438,759	0.12%
18058	Philadelphia Ind Ins Co	PA	\$2,345,813	0.66%	11255	Caterpillar Ins Co	MO	\$438,146	0.12%
43575	Indemnity Ins Co Of North Amer	PA	\$2,319,745	0.66%	13056	RLI Ins Co	IL	\$410,317	0.12%
19976	Amica Mut Ins Co	RI	\$2,292,769	0.65%	21105	North River Ins Co	NJ	\$408,019	0.12%
29530	AXA Art Ins Corp	NY	\$2,213,401	0.63%	15040	Providence Mut Fire Ins Co	RI	\$405,921	0.11%
26298	Metropolitan Prop & Cas Ins Co	RI	\$2,178,551	0.62%	25143	State Farm Fire And Cas Co	IL	\$402,119	0.11%
11185	Foremost Ins Co	MI	\$2,013,701	0.57%	15067	Quincy Mut Fire Ins Co	MA	\$401,539	0.11%
14354	Jewelers Mut Ins Co	WI	\$2,009,714	0.57%	25615	Charter Oak Fire Ins Co	CT	\$396,570	0.11%
16691	Great Amer Ins Co	OH	\$1,988,753	0.56%	23809	Granite State Ins Co	PA	\$371,540	0.10%
25941	USAA	TX	\$1,952,610	0.55%	19410	Commerce & Industry Ins Co	NY	\$357,842	0.10%
35289	Continental Ins Co	PA	\$1,874,511	0.53%	23248	Occidental Fire & Cas Co Of NC	NC	\$351,301	0.10%
26182	Harleysville Worcester Ins Co	PA	\$1,798,992	0.51%	31089	Republic Western Ins Co	AZ	\$348,677	0.10%
26018	Vermont Mut Ins Co	VT	\$1,768,823	0.50%	13943	Fitchburg Mut Ins Co	MA	\$333,210	0.09%
25968	USAA Cas Ins Co	TX	\$1,768,741	0.50%	20648	Employers Fire Ins Co	MA	\$323,629	0.09%
25658	Travelers Ind Co	CT	\$1,768,681	0.50%	33600	LM Ins Corp	IA	\$312,532	0.09%
34754	Commerce Ins Co	MA	\$1,752,863	0.50%	37540	Beazley Ins Co Inc	CT	\$308,254	0.09%
21113	United States Fire Ins Co	DE	\$1,738,893	0.49%	14923	Patrons Mut Ins Co Of Ct	CT	\$305,572	0.09%
21857	American Ins Co	OH	\$1,734,710	0.49%	25976	Utica Mut Ins Co	NY	\$304,409	0.09%
19372	Northern Ins Co Of NY	NY	\$1,714,895	0.48%	25852	New England Guar Ins Co Inc	VT	\$293,862	0.08%
33618	Safety Ind Ins Co	MA	\$1,710,722	0.48%	11991	National Cas Co	WI	\$285,453	0.08%
28932	Markel Amer Ins Co	VA	\$1,683,697	0.48%	25682	Travelers Ind Co Of CT	CT	\$279,247	0.08%

NAIC #	Company Name	State	Premium	Market	NAIC #	Company Name	State	Premium	Market
			Written in MA as of 12/31/2008	Share in MA as of 12/31/2008				Written in MA as of 12/31/2008	Share in MA as of 12/31/2008
24414	General Cas Co Of WI	WI	\$264,866	0.07%	20508	Valley Forge Ins Co	PA	\$48,348	0.01%
22578	Horace Mann Ins Co	IL	\$256,921	0.07%	26344	Great Amer Assur Co	OH	\$46,647	0.01%
14168	Harleysville Mut Ins Co	PA	\$248,756	0.07%	24775	St Paul Guardian Ins Co	MN	\$42,374	0.01%
11452	Hartford Steam Boil Inspec & Ins Co	CT	\$230,066	0.06%	19704	American States Ins Co	IN	\$39,533	0.01%
19720	American Alt Ins Corp	DE	\$216,870	0.06%	21172	Vanliner Ins Co	MO	\$38,262	0.01%
21261	Electric Ins Co	MA	\$213,710	0.06%	12904	Tokio Marine & Nichido Fire Ins Co	NY	\$38,240	0.01%
37915	Essentia Ins Co	MO	\$210,890	0.06%	24449	Regent Ins Co	WI	\$36,918	0.01%
21180	Sentry Select Ins Co	WI	\$206,625	0.06%	24813	Balboa Ins Co	CA	\$36,696	0.01%
20680	Green Mountain Ins Co Inc	VT	\$206,454	0.06%	23108	Lumbermens Underwriting Alliance	MO	\$34,582	0.01%
10205	Mountain Valley Ind Co	NH	\$195,795	0.06%	23329	Merchants Mut Ins Co	NY	\$34,351	0.01%
12808	Safety Prop & Cas Ins Co	MA	\$194,802	0.06%	23787	Nationwide Mut Ins Co	OH	\$34,012	0.01%
40045	Starnet Ins Co	DE	\$194,507	0.05%	21903	Procentury Ins Co	TX	\$33,881	0.01%
13935	Federated Mut Ins Co	MN	\$189,855	0.05%	36137	Travelers Commercial Ins Co	CT	\$33,874	0.01%
27740	North Pointe Ins Co	MI	\$186,272	0.05%	30104	Hartford Underwriters Ins Co	CT	\$33,730	0.01%
11045	Excelsior Ins Co	NH	\$178,909	0.05%	14982	Penn Millers Ins Co	PA	\$30,228	0.01%
25860	Union Mut Fire Ins Co	VT	\$174,064	0.05%	21423	Union Ins Co Of Providence	IA	\$30,202	0.01%
37923	Seaworthy Ins Co	MD	\$174,031	0.05%	10200	Hiscox Ins Co Inc	IL	\$29,020	0.01%
37060	Old United Cas Co	KS	\$172,798	0.05%	21784	Firemens Ins Co Of Washington DC	DE	\$28,660	0.01%
19356	Maryland Cas Co	MD	\$171,241	0.05%	29424	Hartford Cas Ins Co	IN	\$27,663	0.01%
20494	Transportation Ins Co	IL	\$168,897	0.05%	26832	Great Amer Alliance Ins Co	OH	\$25,597	0.01%
34711	Computer Ins Co	RI	\$168,413	0.05%	10054	Securian Cas Co	MN	\$23,440	0.01%
10847	Cumis Ins Society Inc	IA	\$155,244	0.04%	33855	Lincoln Gen Ins Co	PA	\$22,264	0.01%
21962	Pennsylvania Gen Ins Co	PA	\$153,340	0.04%	19224	St Paul Protective Ins Co	IL	\$22,108	0.01%
21326	Empire Fire & Marine Ins Co	NE	\$150,480	0.04%	35769	Lyndon Prop Ins Co	MO	\$21,692	0.01%
39926	Selective Ins Co Of The Southeast	IN	\$149,926	0.04%	21121	Westchester Fire Ins Co	NY	\$20,435	0.01%
31267	York Ins Co of ME	ME	\$140,899	0.04%	12901	Merchants Preferred Ins Co	NY	\$18,911	0.01%
23817	Illinois Natl Ins Co	IL	\$140,337	0.04%	24554	XL Ins Amer Inc	DE	\$17,052	0.00%
21415	Employers Mut Cas Co	IA	\$136,051	0.04%	26433	Harco Natl Ins Co	IL	\$16,109	0.00%
25224	Great Divide Ins Co	ND	\$130,188	0.04%	42404	Liberty Ins Corp	IL	\$15,782	0.00%
24074	Ohio Cas Ins Co	OH	\$129,283	0.04%	24171	Netherlands Ins Co The	NH	\$15,544	0.00%
14974	Pennsylvania Lumbermens Mut Ins	PA	\$127,465	0.04%	10243	National Continental Ins Co	NY	\$14,607	0.00%
25666	Travelers Ind Co Of Amer	CT	\$126,918	0.04%	14826	New London Cnty Mut Ins Co	CT	\$13,982	0.00%
19402	AIG Cas Co	PA	\$125,143	0.04%	16578	Fidelity Natl Prop & Cas Ins Co	NY	\$12,202	0.00%
12777	Chubb Ind Ins Co	NY	\$123,390	0.03%	20427	American Cas Co Of Reading PA	PA	\$11,572	0.00%
26166	Windsor Mount Joy Mut Ins Co	PA	\$122,318	0.03%	40827	Virginia Surety Co Inc	IL	\$10,794	0.00%
20230	Central Mut Ins Co	OH	\$121,162	0.03%	10815	Verlan Fire Ins Co MD	MD	\$10,389	0.00%
24791	St Paul Mercury Ins Co	MN	\$105,021	0.03%	33022	AXA Ins Co	NY	\$10,000	0.00%
32620	National Interstate Ins Co	OH	\$104,863	0.03%	13714	Pharmacists Mut Ins Co	IA	\$9,869	0.00%
10936	Seneca Ins Co Inc	NY	\$104,646	0.03%	29459	Twin City Fire Ins Co Co	IN	\$9,867	0.00%
24147	Old Republic Ins Co	PA	\$100,000	0.03%	10677	Cincinnati Ins Co	OH	\$9,855	0.00%
33588	First Liberty Ins Corp	IA	\$94,840	0.03%	39306	Fidelity & Deposit Co Of MD	MD	\$8,584	0.00%
20362	Mitsui Sumitomo Ins Co of Amer	NY	\$94,050	0.03%	39217	QBE Ins Corp	PA	\$8,015	0.00%
22322	Greenwich Ins Co	DE	\$92,368	0.03%	24260	Progressive Cas Ins Co	OH	\$7,826	0.00%
41459	Armed Forces Ins Exch	KS	\$85,782	0.02%	13463	Barnstable Cnty Mut Ins Co	MA	\$7,315	0.00%
25887	US Fidelity & Guaranty Co	MD	\$77,457	0.02%	22314	RSUI Ind Co	NH	\$6,920	0.00%
23175	Phenix Mut Fire Ins Co	NH	\$77,348	0.02%	18333	Peerless Ind Ins Co	IL	\$6,566	0.00%
24988	Sentry Ins A Mut Co	WI	\$76,759	0.02%	25992	Northern Security Ins Co Inc	VT	\$6,141	0.00%
38245	BCS Ins Co	OH	\$76,081	0.02%	37710	First Amer Prop & Cas Ins Co	CA	\$6,112	0.00%
43001	Narragansett Bay Ins Co	RI	\$75,073	0.02%	32077	Heritage Cas Ins Co	IL	\$6,006	0.00%
29939	Main St Amer Assur Co	FL	\$72,712	0.02%	23337	American European Ins Co	NH	\$5,907	0.00%
25984	Graphic Arts Mut Ins Co	NY	\$72,562	0.02%	27120	Trumbull Ins Co	CT	\$5,835	0.00%
12866	T.H.E. Ins Co	LA	\$72,226	0.02%	37850	Pacific Specialty Ins Co	CA	\$5,413	0.00%
19631	American Road Ins Co	MI	\$70,261	0.02%	40142	American Zurich Ins Co	IL	\$4,832	0.00%
35696	Harleysville Preferred Ins Co	PA	\$69,389	0.02%	19062	Automobile Ins Co Of Hartford CT	CT	\$3,892	0.00%
21849	American Automobile Ins Co	MO	\$68,461	0.02%	41343	Gerling Amer Ins Co	NY	\$3,879	0.00%
22683	Teachers Ins Co	IL	\$59,068	0.02%	19690	American Economy Ins Co	IN	\$3,802	0.00%
10052	Chubb Natl Ins Co	IN	\$57,828	0.02%	14532	Middlesex Mut Assur Co	CT	\$3,723	0.00%
34274	Central States Ind Co Of Omaha	NE	\$54,314	0.02%	10499	DaimlerChrysler Ins Co	MI	\$3,653	0.00%
16322	Progressive Direct Ins Co	OH	\$53,661	0.02%	19801	Argonaut Ins Co	IL	\$3,141	0.00%
13331	American Hardware Mut Ins Co	OH	\$50,369	0.01%	33723	Great Amer Spirit Ins Co	OH	\$2,805	0.00%



NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
22187	Greater NY Mut Ins Co	NY	\$2,078	0.00%	20478	National Fire Ins Co Of Hartford	IL	\$246	0.00%
16217	National Farmers Union Prop & Cas	CO	\$1,800	0.00%	19909	Centennial Ins Co	NY	\$76	0.00%
10510	Carolina Cas Ins Co	IA	\$1,660	0.00%	39845	Westport Ins Corp	MO	\$58	0.00%
11967	General Star Natl Ins Co	OH	\$1,652	0.00%	27073	Nipponkoa Ins Co Ltd US Br	NY	\$39	0.00%
11770	United Encl Cas Co	OH	\$1,574	0.00%	25879	Fidelity & Guar Ins Underwriters Inc	WI	\$7	0.00%
27847	Insurance Co Of The West	CA	\$1,570	0.00%					
12190	American Pet Ins Co	NY	\$1,269	0.00%					
12262	Pennsylvania Manufacturers Assoc Ins	PA	\$1,000	0.00%					
24031	Northland Cas Co	MN	\$885	0.00%					
24732	General Ins Co Of Amer	WA	\$852	0.00%					
20222	All Amer Ins Co	OH	\$743	0.00%					
24724	First Natl Ins Co Of Amer	WA	\$645	0.00%					
10069	Housing Authority Prop A Mut Co	VT	\$537	0.00%					
41181	Universal Underwriters Ins Co	KS	\$450	0.00%					
30325	Zale Ind Co	TX	\$380	0.00%					
22195	Insurance Co Of Greater NY	NY	\$379	0.00%					
11024	Strathmore Ins Co	NY	\$377	0.00%					
41955	Barnstable Cnty Ins Co	MA	\$308	0.00%					
23450	American Family Home Ins Co	FL	\$258	0.00%					
					Total Direct Premium				\$354,113,268 100.00%

## 2008 Premium and Market Share - PRIVATE PASSENGER AUTO

	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
	34754	Commerce Ins Co	MA	\$1,152,265,018	31.00%
	39454	Safety Ins Co	MA	\$410,908,827	11.05%
	17000	Arbella Mut Ins Co	MA	\$343,901,412	9.25%
	23043	Liberty Mut Ins Co	MA	\$311,296,698	8.37%
	26298	Metropolitan Prop & Cas Ins Co	RI	\$242,765,253	6.53%
	12850	Premier Ins Co Of MA	MA	\$233,279,433	6.28%
	14737	Plymouth Rock Assur Corp	MA	\$218,578,695	5.88%
	19976	Amica Mut Ins Co	RI	\$134,585,513	3.62%
	31534	Citizens Ins Co Of Amer	MI	\$101,990,142	2.74%
	40320	Massachusetts Homeland Ins Co	MA	\$92,630,543	2.49%
	12154	Encompass Ins Co of MA	MA	\$78,478,844	2.11%
	15067	Quincy Mut Fire Ins Co	MA	\$62,022,455	1.67%
	14788	NGM Ins Co	FL	\$46,696,232	1.26%
	16322	Progressive Direct Ins Co	OH	\$46,070,892	1.24%
	23965	Norfolk & Dedham Mut Fire Ins Co	MA	\$41,527,639	1.12%
	25968	USAA Cas Ins Co	TX	\$40,834,411	1.10%
	22292	Hanover Ins Co	NH	\$40,745,525	1.10%
	25941	USAA	TX	\$37,923,707	1.02%
	21849	American Automobile Ins Co	MO	\$17,893,461	0.48%
	21750	Pilgrim Ins Co	MA	\$17,789,301	0.48%
	25178	State Farm Mut Auto Ins Co	IL	\$15,618,219	0.42%
	21261	Electric Ins Co	MA	\$14,837,152	0.40%
	13803	Farm Family Cas Ins Co	NY	\$5,326,335	0.14%
	24198	Peerless Ins Co	NH	\$3,046,817	0.08%
	26522	Mount Vernon Fire Ins Co	PA	\$2,429,113	0.07%
	37915	Essentia Ins Co	MO	\$958,818	0.03%
	26018	Vermont Mut Ins Co	VT	\$793,207	0.02%
	11185	Foremost Ins Co	MI	\$504,478	0.01%
	11150	Arch Ins Co	MO	\$354,096	0.01%
	10111	American Bankers Ins Co Of FL	FL	\$311,555	0.01%
	26182	Harleysville Worcester Ins Co	PA	\$261,988	0.01%
	32220	American Intl Ins Co	NY	\$240,618	0.01%
	28932	Markel Amer Ins Co	VA	\$110,472	0.00%
	31267	York Ins Co of ME	ME	\$9,318	0.00%
	21962	Pennsylvania Gen Ins Co	PA	\$1,110	0.00%
	20648	Employers Fire Ins Co	MA	\$41	0.00%
	21873	Firemans Fund Ins Co	CA	\$30	0.00%
	22578	Horace Mann Ins Co	IL	\$25	0.00%
Total Direct Written Premium				\$3,716,987,393	100.00%

## 2008 Premium and Market Share - PROPERTY &amp; CASUALTY TOTAL

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
34754	Commerce Ins Co	MA	\$1,335,297,056	12.87%	10394	Bunker Hill Ins Co	MA	\$33,839,826	0.33%
39454	Safety Ins Co	MA	\$499,040,977	4.81%	26247	American Guar & Liab Ins	NY	\$33,747,891	0.33%
17000	Arbella Mut Ins Co	MA	\$446,520,074	4.30%	32220	American Intl Ins Co	NY	\$33,689,125	0.32%
23043	Liberty Mut Ins Co	MA	\$407,339,172	3.93%	31194	Travelers Cas & Surety Co Of Amer	CT	\$33,163,359	0.32%
26298	Metropolitan Prop & Cas Ins Co	RI	\$302,923,651	2.92%	19380	American Home Assur Co	NY	\$33,122,893	0.32%
20281	Federal Ins Co	IN	\$237,330,737	2.29%	20397	Vigilant Ins Co	NY	\$31,881,214	0.31%
12850	Premier Ins Co Of MA	MA	\$233,279,432	2.25%	20621	OneBeacon Amer Ins Co	MA	\$31,866,501	0.31%
14737	Plymouth Rock Assur Corp	MA	\$219,011,022	2.11%	13463	Barnstable Cnty Mut Ins Co	MA	\$31,440,257	0.30%
19976	Amica Mut Ins Co	RI	\$195,387,327	1.88%	14192	Hingham Mut Fire Ins Co	MA	\$30,923,925	0.30%
19445	National Union Fire Ins Co Of Pitts	PA	\$181,497,757	1.75%	19801	Argonaut Ins Co	IL	\$30,657,152	0.30%
23035	Liberty Mut Fire Ins Co	WI	\$178,393,032	1.72%	21261	Electric Ins Co	MA	\$28,853,919	0.28%
15067	Quincy Mut Fire Ins Co	MA	\$172,191,175	1.66%	21857	American Ins Co	OH	\$28,239,974	0.27%
19798	Merrimack Mut Fire Ins Co	MA	\$150,371,568	1.45%	14206	Holyoke Mut Ins Co In Salem	MA	\$27,673,777	0.27%
31534	Citizens Ins Co Of Amer	MI	\$149,447,214	1.44%	19038	Travelers Cas & Surety Co	CT	\$26,886,390	0.26%
10206	Medical Professional Mut Ins Co	MA	\$136,944,563	1.32%	15040	Providence Mut Fire Ins Co	RI	\$25,076,743	0.24%
22292	Hanover Ins Co	NH	\$123,137,915	1.19%	37478	Hartford Ins Co Of The Midwest	IN	\$24,613,526	0.24%
41360	Arbella Protection Ins Co	MA	\$119,998,076	1.16%	21873	Firemans Fund Ins Co	CA	\$24,435,432	0.24%
40274	Citation Ins Co	MA	\$116,191,302	1.12%	37273	Axis Ins Co	IL	\$23,817,675	0.23%
14788	NGM Ins Co	FL	\$114,645,617	1.10%	25976	Utica Mut Ins Co	NY	\$23,151,134	0.22%
25674	Travelers Property Cas Co Of Amer	CT	\$111,271,353	1.07%	44326	Atlantic Charter Ins Co	MA	\$22,654,209	0.22%
40320	Massachusetts Homeland Ins Co	MA	\$106,902,214	1.03%	13706	Dorchester Mut Ins Co	MA	\$22,312,701	0.22%
26018	Vermont Mut Ins Co	VT	\$102,705,893	0.99%	19410	Commerce & Industry Ins Co	NY	\$22,175,283	0.21%
25658	Travelers Ind Co	CT	\$101,464,224	0.98%	42978	American Security Ins Co	DE	\$21,762,001	0.21%
20443	Continental Cas Co	IL	\$101,378,091	0.98%	41181	Universal Underwriters Ins Co	KS	\$21,691,023	0.21%
25623	Phoenix Ins Co	CT	\$97,130,228	0.94%	21113	United States Fire Ins Co	DE	\$21,575,259	0.21%
23965	Norfolk & Dedham Mut Fire Ins Co	MA	\$93,771,916	0.90%	24791	St Paul Mercury Ins Co	MN	\$21,493,503	0.21%
12154	Encompass Ins Co of MA	MA	\$93,377,139	0.90%	23841	New Hampshire Ins Co	PA	\$21,015,980	0.20%
20648	Employers Fire Ins Co	MA	\$92,718,392	0.89%	40142	American Zurich Ins Co	IL	\$20,411,482	0.20%
16535	Zurich American Ins Co	NY	\$84,212,161	0.81%	21849	American Automobile Ins Co	MO	\$20,253,302	0.20%
18058	Philadelphia Ind Ins Co	PA	\$83,782,283	0.81%	24740	Safeco Ins Co Of Amer	WA	\$20,248,593	0.20%
22667	Ace Amer Ins Co	PA	\$81,769,914	0.79%	19356	Maryland Cas Co	MD	\$20,006,735	0.19%
25615	Charter Oak Fire Ins Co	CT	\$76,986,495	0.74%	20508	Valley Forge Ins Co	PA	\$19,895,555	0.19%
19429	Insurance Co Of The State Of PA	PA	\$74,018,780	0.71%	30104	Hartford Underwriters Ins Co	CT	\$19,325,789	0.19%
33618	Safety Ind Ins Co	MA	\$72,315,419	0.70%	25844	Union Ins Co	IA	\$18,896,689	0.18%
25941	USAA	TX	\$71,891,236	0.69%	14826	New London Cnty Mut Ins Co	CT	\$18,760,259	0.18%
29459	Twin City Fire Ins Co Co	IN	\$65,205,205	0.63%	11045	Excelsior Ins Co	NH	\$18,719,653	0.18%
19682	Hartford Fire In Co	CT	\$62,703,689	0.60%	20478	National Fire Ins Co Of Hartford	IL	\$18,701,045	0.18%
25968	USAA Cas Ins Co	TX	\$61,832,728	0.60%	38458	Genworth Mortgage Ins Corp	NC	\$18,633,714	0.18%
33758	Associated Industries Of MA Mut Ins	MA	\$61,681,988	0.59%	21326	Empire Fire & Marine Ins Co	NE	\$18,442,229	0.18%
20346	Pacific Ind Co	WI	\$60,131,232	0.58%	16691	Great Amer Ins Co	OH	\$18,176,322	0.18%
21482	Factory Mut Ins Co	RI	\$57,659,619	0.56%	10120	Everest Natl Ins Co	DE	\$18,046,189	0.17%
26182	Harleysville Worcester Ins Co	PA	\$56,510,133	0.54%	14923	Patrons Mut Ins Co Of Ct	CT	\$17,406,155	0.17%
21750	Pilgrim Ins Co	MA	\$53,376,885	0.51%	10014	Affiliated Fm Ins Co	RI	\$17,306,206	0.17%
31325	Acadia Ins Co	NH	\$51,455,442	0.50%	15059	Public Service Mut Ins Co	NY	\$16,759,185	0.16%
19070	Standard Fire Ins Co	CT	\$48,286,877	0.47%	12831	State Natl Ins Co Inc	TX	\$16,407,721	0.16%
16322	Progressive Direct Ins Co	OH	\$46,148,504	0.44%	24147	Old Republic Ins Co	PA	\$16,404,746	0.16%
25682	Travelers Ind Co Of CT	CT	\$45,298,288	0.44%	24171	Netherlands Ins Co The	NH	\$16,251,567	0.16%
24767	St Paul Fire & Marine Ins Co	MN	\$44,738,466	0.43%	11104	Associated Employers Ins Co	MA	\$16,037,181	0.15%
23809	Granite State Ins Co	PA	\$44,705,185	0.43%	25178	State Farm Mut Auto Ins Co	IL	\$15,913,352	0.15%
15024	Preferred Mut Ins Co	NY	\$44,158,927	0.43%	11150	Arch Ins Co	MO	\$15,795,078	0.15%
42404	Liberty Ins Corp	IL	\$42,043,974	0.41%	42552	Nova Cas Co	NY	\$15,749,615	0.15%
22306	Massachusetts Bay Ins Co	NH	\$41,971,364	0.40%	20230	Central Mut Ins Co	OH	\$15,716,244	0.15%
20303	Great Northern Ins Co	IN	\$39,510,354	0.38%	21970	OneBeacon Ins Co	PA	\$15,492,111	0.15%
24198	Peerless Ins Co	NH	\$38,510,601	0.37%	25992	Northern Security Ins Co Inc	VT	\$15,350,914	0.15%
37885	XL Specialty Ins Co	DE	\$38,045,725	0.37%	18708	Ambac Assur Corp	WI	\$15,008,267	0.14%
25666	Travelers Ind Co Of Amer	CT	\$37,956,454	0.37%	20494	Transportation Ins Co	IL	\$14,958,577	0.14%
29424	Hartford Cas Ins Co	IN	\$37,728,972	0.36%	14532	Middlesex Mut Assur Co	CT	\$14,904,834	0.14%
29858	Mortgage Guar Ins Corp	WI	\$37,345,508	0.36%	13943	Fitchburg Mut Ins Co	MA	\$14,565,065	0.14%
19771	Cambridge Mut Fire Ins Co	MA	\$36,902,849	0.36%	33790	Radian Guaranty Inc	PA	\$14,530,566	0.14%
13803	Farm Family Cas Ins Co	NY	\$36,355,864	0.35%	15873	United Gty Residential Ins Co	NC	\$14,507,292	0.14%

NAIC #	Company Name	State	Premium	Market	NAIC #	Company Name	State	Premium	Market
			Written in MA as of 12/31/2008	Share in MA as of 12/31/2008				Written in MA as of 12/31/2008	Share in MA as of 12/31/2008
21121	Westchester Fire Ins Co	NY	\$14,356,627	0.14%	24813	Balboa Ins Co	CA	\$6,981,391	0.07%
20427	American Cas Co Of Reading PA	PA	\$13,802,427	0.13%	42376	Technology Ins Co Inc	NH	\$6,981,057	0.07%
29599	US Specialty Ins Co	TX	\$13,526,794	0.13%	43575	Indemnity Ins Co Of North Amer	PA	\$6,957,470	0.07%
39217	OBE Ins Corp	PA	\$13,389,556	0.13%	35289	Continental Ins Co	PA	\$6,909,630	0.07%
27251	PMI Mortgage Ins Co	AZ	\$13,332,556	0.13%	10017	Arbella Ind Ins Co	MA	\$6,802,055	0.07%
24414	General Cas Co Of WI	WI	\$13,245,546	0.13%	43001	Narragansett Bay Ins Co	RI	\$6,783,223	0.07%
13188	Western Surety Co	SD	\$13,029,836	0.13%	26344	Great Amer Assur Co	OH	\$6,654,757	0.06%
11991	National Cas Co	WI	\$12,724,435	0.12%	20222	All Amer Ins Co	OH	\$6,624,433	0.06%
21784	Firemens Ins Co Of Washington DC	DE	\$12,541,323	0.12%	35300	Allianz Global Risks US Ins Co	CA	\$6,526,011	0.06%
25984	Graphic Arts Mut Ins Co	NY	\$12,340,803	0.12%	14168	Harleysville Mut Ins Co	PA	\$6,455,190	0.06%
11843	Medical Protective Co	IN	\$12,254,362	0.12%	19046	Travelers Cas Ins Co Of Amer	CT	\$6,408,036	0.06%
33600	LM Ins Corp	IA	\$12,091,201	0.12%	24988	Sentry Ins A Mut Co	WI	\$6,225,385	0.06%
12886	Massachusetts Employers Ins Co	MA	\$11,907,292	0.11%	10510	Carolina Cas Ins Co	IA	\$6,078,607	0.06%
10804	Continental Western Ins Co	IA	\$11,894,451	0.11%	20052	National Liab & Fire Ins Co	CT	\$5,986,152	0.06%
25860	Union Mut Fire Ins Co	VT	\$11,893,696	0.11%	23175	Phenix Mut Fire Ins Co	NH	\$5,890,675	0.06%
11984	Independence Cas Ins Co	MA	\$11,813,429	0.11%	18287	Financial Security Assur Inc	NY	\$5,878,072	0.06%
22322	Greenwich Ins Co	DE	\$11,629,398	0.11%	19720	American Alt Ins Corp	DE	\$5,832,602	0.06%
19259	Selective Ins Co Of SC	IN	\$11,411,744	0.11%	13056	RLI Ins Co	IL	\$5,717,548	0.06%
21105	North River Ins Co	NJ	\$11,132,992	0.11%	10847	Cumis Ins Society Inc	IA	\$5,694,817	0.05%
42650	OneBeacon Midwest Ins Co	WI	\$11,091,926	0.11%	38970	Markel Ins Co	IL	\$5,651,862	0.05%
39306	Fidelity & Deposit Co Of MD	MD	\$11,046,148	0.11%	10231	Commonwealth Mut Ins Co	MA	\$5,648,078	0.05%
35181	Executive Risk Ind Inc	DE	\$11,014,124	0.11%	20680	Green Mountain Ins Co Inc	VT	\$5,645,047	0.05%
32620	National Interstate Ins Co	OH	\$10,972,651	0.11%	25143	State Farm Fire And Cas Co	IL	\$5,643,778	0.05%
24074	Ohio Cas Ins Co	OH	\$10,949,547	0.11%	18333	Peerless Ind Ins Co	IL	\$5,597,522	0.05%
10243	National Continental Ins Co	NY	\$10,928,608	0.11%	42307	Navigators Ins Co	NY	\$5,597,236	0.05%
38369	Northern Assur Co Of Amer	MA	\$10,792,474	0.10%	18767	Church Mut Ins Co	WI	\$5,476,389	0.05%
25852	New England Guar Ins Co Inc	VT	\$10,705,407	0.10%	12904	Tokio Marine & Nichido Fire Ins Co	NY	\$5,396,113	0.05%
31470	Norguard Ins Co	PA	\$10,604,943	0.10%	14702	Eastguard Ins Co	PA	\$5,378,468	0.05%
22136	Great Amer Ins Co of NY	NY	\$10,599,722	0.10%	10952	Stonebridge Casualty Ins Co	OH	\$5,340,963	0.05%
28452	Republic Mortgage Ins Co	NC	\$10,341,979	0.10%	21881	National Surety Corp	IL	\$5,326,799	0.05%
21865	Associated Ind Corp	CA	\$10,140,690	0.10%	21962	Pennsylvania Gen Ins Co	PA	\$5,277,008	0.05%
10111	American Bankers Ins Co Of FL	FL	\$9,890,398	0.10%	20699	Ace Prop & Cas Ins Co	PA	\$5,217,153	0.05%
39845	Westport Ins Corp	MO	\$9,794,576	0.09%	31267	York Ins Co of ME	ME	\$4,986,952	0.05%
29874	North Amer Specialty Ins Co	NH	\$9,730,185	0.09%	42390	Amguard Ins Co	PA	\$4,914,891	0.05%
26069	Wausau Business Ins Co	WI	\$9,528,582	0.09%	10664	Endeavour Ins Co	MA	\$4,884,496	0.05%
26522	Mount Vernon Fire Ins Co	PA	\$9,511,357	0.09%	20516	Euler Hermes Amer Credit Ind Co	MD	\$4,843,595	0.05%
16578	Fidelity Natl Prop & Cas Ins Co	NY	\$9,452,033	0.09%	43702	Tower National Ins Co	MA	\$4,757,935	0.05%
12475	Republic-Franklin Ins Co	OH	\$9,220,281	0.09%	13163	Hospitality Mut Ins Co	MA	\$4,581,221	0.04%
19917	Liberty Ins Underwriters Inc	NY	\$9,149,152	0.09%	44393	West American Ins Co	IN	\$4,500,829	0.04%
22187	Greater NY Mut Ins Co	NY	\$8,959,292	0.09%	39527	Heritage Ind Co	CA	\$4,367,680	0.04%
22578	Horace Mann Ins Co	IL	\$8,660,747	0.08%	24260	Progressive Cas Ins Co	OH	\$4,337,030	0.04%
24554	XL Ins Amer Inc	DE	\$8,621,751	0.08%	19372	Northern Ins Co Of NY	NY	\$4,285,032	0.04%
23817	Illinois Natl Ins Co	IL	\$8,567,515	0.08%	15105	Safety Natl Cas Corp	MO	\$4,202,442	0.04%
27928	Amex Assur Co	IL	\$8,470,460	0.08%	21415	Employers Mut Cas Co	IA	\$4,078,201	0.04%
21458	Employers Ins of Wausau	WI	\$8,272,625	0.08%	41343	Gerling Amer Ins Co	NY	\$4,076,919	0.04%
19305	Assurance Co Of Amer	NY	\$8,225,646	0.08%	37540	Beazley Ins Co Inc	CT	\$4,035,839	0.04%
23612	Midwest Employers Cas Co	DE	\$8,021,226	0.08%	11030	Memic Ind Co	NH	\$3,890,936	0.04%
21172	Vanliner Ins Co	MO	\$7,992,055	0.08%	44300	Tower Ins Co Of NY	NY	\$3,885,066	0.04%
35696	Harleysville Preferred Ins Co	PA	\$7,988,160	0.08%	16551	Savers Prop & Cas Ins Co	MO	\$3,834,056	0.04%
33588	First Liberty Ins Corp	IA	\$7,965,534	0.08%	10205	Mountain Valley Ind Co	NH	\$3,796,880	0.04%
22357	Hartford Accident & Ind Co	CT	\$7,901,033	0.08%	10936	Seneca Ins Co Inc	NY	\$3,724,928	0.04%
30180	Assured Guar Corp	MD	\$7,858,200	0.08%	15890	Connecticut Medical Ins Co	CT	\$3,619,595	0.03%
23469	American Modern Home Ins Co	OH	\$7,811,468	0.08%	13374	Arrow Mut Liab Ins Co	MA	\$3,553,941	0.03%
18023	Star Ins Co	MI	\$7,640,122	0.07%	21180	Sentry Select Ins Co	WI	\$3,512,174	0.03%
13935	Federated Mut Ins Co	MN	\$7,342,766	0.07%	41955	Barnstable Cnty Ins Co	MA	\$3,468,413	0.03%
22314	RSUI Ind Co	NH	\$7,308,532	0.07%	24732	General Ins Co Of Amer	WA	\$3,451,509	0.03%
23329	Merchants Mut Ins Co	NY	\$7,230,252	0.07%	14982	Penn Millers Ins Co	PA	\$3,409,258	0.03%
26042	Wausau Underwriters Ins Co	WI	\$7,135,816	0.07%	13331	American Hardware Mut Ins Co	OH	\$3,363,093	0.03%
36463	Discover Prop & Cas Ins Co	IL	\$7,126,551	0.07%	39926	Selective Ins Co Of The Southeast	IN	\$3,354,806	0.03%
11185	Foremost Ins Co	MI	\$7,038,993	0.07%	11024	Strathmore Ins Co	NY	\$3,252,146	0.03%

NAIC #	Company Name	State	Premium	Market	NAIC #	Company Name	State	Premium	Market
			Written in MA as of 12/31/2008	Share in MA as of 12/31/2008				Written in MA as of 12/31/2008	Share in MA as of 12/31/2008
31887	Coface N Amer Ins Co	MA	\$3,197,677	0.03%	20702	Ace Fire Underwriters Ins Co	PA	\$1,422,859	0.01%
11255	Caterpillar Ins Co	MO	\$3,148,573	0.03%	24350	Triad Guaranty Ins Corp	IL	\$1,413,988	0.01%
20370	AXIS Reins Co	NY	\$3,135,591	0.03%	12750	Evergreen Natl Ind Co	OH	\$1,405,824	0.01%
29939	Main St Amer Assur Co	FL	\$3,096,479	0.03%	10690	Allied World Natl Assur Co	NH	\$1,376,554	0.01%
40266	CMG Mortgage Ins Co	WI	\$3,089,888	0.03%	42048	Diamond State Ins Co	IN	\$1,328,964	0.01%
20362	Mitsui Sumitomo Ins Co of Amer	NY	\$3,051,808	0.03%	34690	Property & Cas Ins Co Of Hartford	IN	\$1,315,973	0.01%
14974	Pennsylvania Lumbermens Mut Ins	PA	\$3,049,490	0.03%	32778	Washington Intl Ins Co	NH	\$1,272,634	0.01%
26565	Ohio Ind Co	OH	\$3,022,720	0.03%	22039	General Reins Corp	DE	\$1,247,041	0.01%
36226	United Cas & Surety Ins Co	MA	\$2,936,359	0.03%	19615	American Reliable Ins Co	AZ	\$1,188,075	0.01%
25054	Hudson Ins Co	DE	\$2,907,859	0.03%	40827	Virginia Surety Co Inc	IL	\$1,179,951	0.01%
37257	Praetorian Ins Co	IL	\$2,896,172	0.03%	37915	Essentia Ins Co	MO	\$1,169,708	0.01%
16608	New York Marine & Gen Ins Co	NY	\$2,864,500	0.03%	24449	Regent Ins Co	WI	\$1,122,042	0.01%
19402	AIG Cas Co	PA	\$2,857,646	0.03%	10340	Stonington Ins Co	TX	\$1,112,856	0.01%
22241	Medmarc Cas Ins Co	VT	\$2,811,113	0.03%	10499	DaimlerChrysler Ins Co	MI	\$1,112,104	0.01%
11770	United Fncl Cas Co	OH	\$2,799,537	0.03%	16624	Darwin Natl Assur Co	DE	\$1,105,237	0.01%
36137	Travelers Commercial Ins Co	CT	\$2,786,590	0.03%	18600	USAA General Ind Co	TX	\$1,085,630	0.01%
14354	Jewelers Mut Ins Co	WI	\$2,768,533	0.03%	10656	United States Surety Co	MD	\$1,040,152	0.01%
11452	Hartford Steam Boil Inspec & Ins Co	CT	\$2,767,492	0.03%	34347	Colonial Amer Cas & Surety Co	MD	\$1,025,407	0.01%
24066	American Fire & Cas Co	OH	\$2,767,304	0.03%	37621	Toyota Motor Ins Co	IA	\$1,023,824	0.01%
19704	American States Ins Co	IN	\$2,744,349	0.03%	12416	Protective Ins Co	IN	\$1,000,480	0.01%
11630	Jefferson Ins Co	NY	\$2,636,912	0.03%	28460	Sentry Cas Co	WI	\$988,829	0.01%
24139	Old Republic Gen Ins Corp	IL	\$2,608,654	0.03%	11967	General Star Natl Ins Co	OH	\$979,173	0.01%
13978	Florists Mut Ins Co	IL	\$2,589,045	0.02%	40045	Starnet Ins Co	DE	\$945,610	0.01%
11126	Sompo Japan Ins Co of Amer	NY	\$2,545,548	0.02%	20311	Syncora Guarantee Inc	NY	\$927,486	0.01%
25422	Atradius Trade Credit Ins Co	MD	\$2,424,810	0.02%	13927	Homesite Ins Co Of The Midwest	ND	\$913,344	0.01%
22683	Teachers Ins Co	IL	\$2,412,329	0.02%	25887	US Fidelity & Guaranty Co	MD	\$889,598	0.01%
22810	Chicago Ins Co	IL	\$2,390,291	0.02%	23337	American European Ins Co	NH	\$874,314	0.01%
10638	Proselect Ins Co	MA	\$2,388,415	0.02%	41459	Armed Forces Ins Exch	KS	\$871,796	0.01%
28932	Markel Amer Ins Co	VA	\$2,380,833	0.02%	12866	T.H.E. Ins Co	LA	\$849,861	0.01%
19690	American Economy Ins Co	IN	\$2,318,023	0.02%	15032	Guideone Mut Ins Co	IA	\$838,564	0.01%
10069	Housing Authority Prop A Mut Co	VT	\$2,281,726	0.02%	18619	Platte River Ins Co	NE	\$815,797	0.01%
10367	Avenco Ins Co	MD	\$2,246,260	0.02%	22950	Acstar Ins Co	IL	\$805,144	0.01%
29980	First Colonial Ins Co	FL	\$2,231,713	0.02%	23442	Patriot Gen Ins Co	WI	\$780,046	0.01%
29530	AXA Art Ins Corp	NY	\$2,213,401	0.02%	37869	Pre Paid Legal Cas Inc	OK	\$779,725	0.01%
38245	BCS Ins Co	OH	\$2,205,597	0.02%	36455	Northbrook Ind Co	IL	\$768,001	0.01%
41840	Allmerica Fin Benefit Ins Co	MI	\$2,200,946	0.02%	34789	AIG Centennial Ins Co	PA	\$742,191	0.01%
14460	Podiatry Ins Co Of Amer A Mut Co	IL	\$2,177,943	0.02%	23787	Nationwide Mut Ins Co	OH	\$727,319	0.01%
34274	Central States Ind Co Of Omaha	NE	\$2,177,302	0.02%	31348	Crum & Forster Ind Co	DE	\$724,908	0.01%
26832	Great Amer Alliance Ins Co	OH	\$2,140,486	0.02%	35386	Fidelity & Guar Ins Co	IA	\$643,863	0.01%
12808	Safety Prop & Cas Ins Co	MA	\$2,109,472	0.02%	10677	Cincinnati Ins Co	OH	\$640,004	0.01%
40177	Paramount Ins Co	NY	\$2,106,187	0.02%	36340	Camico Mut Ins Co	CA	\$636,490	0.01%
25224	Great Divide Ins Co	ND	\$2,031,868	0.02%	29823	Genworth Residential Mortgage Ins Co	NC	\$626,406	0.01%
19631	American Road Ins Co	MI	\$1,961,188	0.02%	13083	Employers Security Assur Co	MA	\$607,607	0.01%
12262	Pennsylvania Manufacturers Assoc Ins	PA	\$1,949,868	0.02%	21423	Union Ins Co Of Providence	IA	\$605,848	0.01%
22195	Insurance Co Of Greater NY	NY	\$1,883,071	0.02%	10665	Ameritrust Ins Corp	MI	\$603,028	0.01%
11592	International Fidelity Ins Co	NJ	\$1,869,887	0.02%	11800	Foremost Prop & Cas Ins Co	MI	\$575,022	0.01%
27120	Trumbull Ins Co	CT	\$1,849,384	0.02%	22012	Motors Ins Corp	MI	\$570,744	0.01%
12901	Merchants Preferred Ins Co	NY	\$1,759,149	0.02%	37346	Danbury Ins Co	MA	\$557,165	0.01%
26077	Lancer Ins Co	IL	\$1,574,286	0.02%	36064	Hanover Amer Ins Co	NH	\$552,244	0.01%
36145	Travelers Personal Security Ins Co	CT	\$1,569,615	0.02%	26492	Courtesy Ins Co	FL	\$547,703	0.01%
13714	Pharmacists Mut Ins Co	IA	\$1,566,755	0.02%	10641	Endurance Amer Ins Co	DE	\$544,875	0.01%
13730	Selective Ins Co Of NY	NY	\$1,554,634	0.01%	32077	Heritage Cas Ins Co	IL	\$535,151	0.01%
34738	Arag Ins Co	IA	\$1,554,421	0.01%	12041	MBIA Ins Corp	NY	\$522,286	0.01%
28258	Continental Ind Co	IA	\$1,537,417	0.01%	20796	AIG Premier Ins Co	PA	\$521,733	0.01%
22713	Insurance Co of N Amer	PA	\$1,524,503	0.01%	37710	First Amer Prop & Cas Ins Co	CA	\$520,402	0.01%
10815	Verlan Fire Ins Co MD	MD	\$1,505,786	0.01%	24775	St Paul Guardian Ins Co	MN	\$520,281	0.01%
26425	Wausau General Ins Co	WI	\$1,459,122	0.01%	18538	Bancinsure Inc	OK	\$518,032	0.00%
15865	NCMIC Ins Co	IA	\$1,459,033	0.01%	36684	Riverport Ins Co	MN	\$516,523	0.00%
12777	Chubb Ind Ins Co	NY	\$1,458,233	0.01%	22551	Mitsui Sumitomo USA Inc	NY	\$495,585	0.00%
24724	First Natl Ins Co Of Amer	WA	\$1,452,033	0.01%	26433	Harco Natl Ins Co	IL	\$491,611	0.00%

			Premium Written in MA as of	Market Share in MA as of				Premium Written in MA as of	Market Share in MA as of
NAIC #	Company Name	State	12/31/2008	12/31/2008	NAIC #	Company Name	State	12/31/2008	12/31/2008
27081	Bond Safeguard Ins Co	IL	\$485,971	0.00%	19488	Amerisure Ins Co	MI	\$65,153	0.00%
25011	Wesco Ins Co	DE	\$474,477	0.00%	15563	SeaBright Ins Co	IL	\$64,643	0.00%
41211	Triton Ins Co	TX	\$470,912	0.00%	23620	Burlington Ins Co	NC	\$63,302	0.00%
19224	St Paul Protective Ins Co	IL	\$461,528	0.00%	29114	CMG Mortgage Assur Co	WI	\$63,271	0.00%
22535	Seaboard Surety Co	NY	\$447,109	0.00%	10052	Chubb Natl Ins Co	IN	\$57,828	0.00%
12718	Developers Surety & Ind Co	IA	\$444,717	0.00%	25879	Fidelity & Guar Ins Underwriters Inc	WI	\$54,320	0.00%
28519	First Sealord Surety Inc	PA	\$430,956	0.00%	10022	Countryway Ins Co	NY	\$51,703	0.00%
14990	Pennsylvania Natl Mut Cas Ins Co	PA	\$420,616	0.00%	38601	MIC Prop & Cas Ins Corp	MI	\$51,508	0.00%
31089	Republic Western Ins Co	AZ	\$400,877	0.00%	20613	Sparta Ins Co	MA	\$48,393	0.00%
42234	Minnesota Lawyers Mut Ins Co	MN	\$399,258	0.00%	22918	American Motorists Ins Co	IL	\$46,748	0.00%
37206	Contractors Bonding & Ins Co	WA	\$396,083	0.00%	29580	Berkley Regional Ins Co	DE	\$46,331	0.00%
24031	Northland Cas Co	MN	\$389,418	0.00%	10472	Capitol Ind Corp	WI	\$45,358	0.00%
33898	Aegis Security Ins Co	PA	\$380,014	0.00%	34495	Doctors Co An Interins Exch	CA	\$43,122	0.00%
42757	Agri Gen Ins Co	IA	\$379,631	0.00%	23396	Amerisure Mut Ins Co	MI	\$42,125	0.00%
23434	Middlesex Ins Co	WI	\$364,827	0.00%	32271	Dallas Natl Ins Co	TX	\$42,064	0.00%
23248	Occidental Fire & Cas Co Of NC	NC	\$351,301	0.00%	22977	Lumbermens Mut Cas Co	IL	\$41,636	0.00%
27740	North Pointe Ins Co	MI	\$336,668	0.00%	33855	Lincoln Gen Ins Co	PA	\$38,964	0.00%
28886	Transguard Ins Co Of Amer Inc	IL	\$329,704	0.00%	27073	Nipponkoa Ins Co Ltd US Br	NY	\$34,685	0.00%
37052	Regis Ins Co	PA	\$311,500	0.00%	21903	Procentury Ins Co	TX	\$33,881	0.00%
36250	Radian Asset Assur Inc	NY	\$307,300	0.00%	10054	Securian Cas Co	MN	\$32,545	0.00%
25585	Professionals Direct Ins Co	MI	\$299,220	0.00%	13269	Zenith Ins Co	CA	\$31,266	0.00%
23582	Harleysville Ins Co	PA	\$293,741	0.00%	10200	Hiscox Ins Co Inc	IL	\$29,020	0.00%
41394	Benchmark Ins Co	KS	\$273,045	0.00%	24082	Ohio Security Ins Co	OH	\$25,516	0.00%
38962	Genesis Ins Co	CT	\$234,490	0.00%	36650	Guarantee Co Of N Amer USA	MI	\$23,628	0.00%
35769	Lyndon Prop Ins Co	MO	\$229,308	0.00%	26379	Accredited Surety & Cas Co Inc	FL	\$22,671	0.00%
16667	United Gty Residential Ins Co Of NC	NC	\$219,924	0.00%	11123	Safety First Ins Co	IL	\$20,802	0.00%
10758	Colonial Surety Co	PA	\$215,377	0.00%	19984	ACIG Ins Co	IL	\$14,677	0.00%
13307	Lexon Ins Co	TX	\$198,995	0.00%	27847	Insurance Co Of The West	CA	\$14,294	0.00%
37060	Old United Cas Co	KS	\$195,133	0.00%	28304	Federated Serv Ins Co	MN	\$13,821	0.00%
37893	Ullico Cas Co	DE	\$186,281	0.00%	22748	Pacific Employers Ins Co	PA	\$12,692	0.00%
23450	American Family Home Ins Co	FL	\$179,722	0.00%	26220	Yosemite Ins Co	IN	\$11,639	0.00%
11149	Maine Employers Mut Ins Co	ME	\$178,837	0.00%	41769	Athena Assur Co	MN	\$9,000	0.00%
37923	Seaworthy Ins Co	MD	\$174,031	0.00%	11231	Generali Us Branch	NY	\$6,105	0.00%
19941	American Commerce Ins Co	OH	\$173,085	0.00%	37850	Pacific Specialty Ins Co	CA	\$5,413	0.00%
16705	Dealers Assur Co	OH	\$171,706	0.00%	41335	United Natl Specialty Ins Co	WI	\$5,354	0.00%
34711	Computer Ins Co	RI	\$168,413	0.00%	19062	Automobile Ins Co Of Hartford CT	CT	\$3,892	0.00%
10642	Cherokee Ins Co	MI	\$163,528	0.00%	11127	Professional Solutions Ins Co	IA	\$3,661	0.00%
28497	Uspplate Glass Ins Co	IL	\$162,042	0.00%	12304	Accident Fund Gen Ins Co	MI	\$2,942	0.00%
15679	National Fire & Ind Exch	MO	\$160,998	0.00%	33723	Great Amer Spirit Ins Co	OH	\$2,910	0.00%
23108	Lumbermens Underwriting Alliance	MO	\$151,997	0.00%	18759	Verex Assure Inc	WI	\$2,264	0.00%
40436	Stratford Ins Co	NH	\$150,813	0.00%	40231	Old Dominion Ins Co	FL	\$2,241	0.00%
10801	Fortress Ins Co	IL	\$146,848	0.00%	31135	Great Amer Security Ins Co	OH	\$2,229	0.00%
33162	Bankers Ins Co	FL	\$146,282	0.00%	18740	MGIC Ind Corp	WI	\$1,543	0.00%
14494	Merchants Bonding Co a Mut	IA	\$138,208	0.00%	19895	Atlantic Mut Ins Co	NY	\$1,442	0.00%
35408	Delos Ins Co	DE	\$136,113	0.00%	10682	MGIC Credit Assur Corp	WI	\$1,320	0.00%
26166	Windsor Mount Joy Mut Ins Co	PA	\$122,318	0.00%	12190	American Pet Ins Co	NY	\$1,269	0.00%
26999	United Guaranty Mtg Indem Co	NC	\$117,896	0.00%	23779	Nationwide Mut Fire Ins Co	OH	\$1,146	0.00%
34037	Hallmark Ins Co	AZ	\$112,847	0.00%	30325	Zale Ind Co	TX	\$644	0.00%
10166	Accident Fund Ins Co of Amer	MI	\$107,345	0.00%	29513	The Bar Plan Mut Ins Co	MO	\$378	0.00%
19909	Centennial Ins Co	NY	\$107,189	0.00%	22730	Allied World Reins Co	NJ	\$373	0.00%
19828	Argonaut Midwest Ins Co	IL	\$97,962	0.00%	22063	Government Employees Ins Co	MD	\$249	0.00%
12297	Petroleum Cas Co	TX	\$93,734	0.00%	12305	Accident Fund Natl Ins Co	MI	\$81	0.00%
12572	Selective Ins Co Of Amer	NJ	\$86,497	0.00%	20095	Bituminous Cas Corp	IL	\$18	0.00%
36153	Aetna Ins Co of CT	CT	\$80,205	0.00%	16675	Genworth Mortgage Ins Corp Of NC	NC	\$8	0.00%
36234	Preferred Professional Ins Co	NE	\$76,668	0.00%	Total Direct Written Premium \$10,375,576,477 100.00%				
24104	Ohio Farmers Ins Co	OH	\$72,677	0.00%					
11371	Great West Cas Co	NE	\$71,333	0.00%					
16217	National Farmers Union Prop & Cas	CO	\$68,794	0.00%					
41238	Trans Pacific Ins Co	NY	\$66,036	0.00%					
25180	Fidelity Natl Ins Co	CA	\$65,919	0.00%					



## 2008 Premium and Market Share - SURPLUS LINES

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
19437	Lexington Ins Co	DE	\$150,261,894	25.79%	25445	Ironshore Specialty Ins Co	AZ	\$1,462,430	0.25%
26883	American Intl Specialty Lines Ins Co	AK	\$38,364,140	6.59%	27189	Associated Intl Ins Co	IL	\$1,165,417	0.20%
26387	Steadfast Ins Co	DE	\$32,734,031	5.62%	10932	AIG Excess Liab Ins Co Ltd	DE	\$1,117,627	0.19%
31127	Columbia Cas Co	IL	\$28,466,779	4.89%	20559	General Security Ind Co of AZ	AZ	\$1,016,724	0.17%
41297	Scottsdale Ins Co	OH	\$22,183,268	3.81%	23850	Philadelphia Ins Co	PA	\$956,208	0.16%
17370	Nautilus Ins Co	AZ	\$21,735,597	3.73%	36056	Navigators Specialty Ins Co	NY	\$847,994	0.15%
13196	Western World Ins Co	NH	\$16,648,765	2.86%	44792	Executive Risk Specialty Ins Co	CT	\$825,691	0.14%
27960	Illinois Union Ins Co	IL	\$14,767,143	2.53%	25569	Gotham Ins Co	NY	\$772,204	0.13%
35378	Evanston Ins Co	IL	\$12,098,293	2.08%	44520	Crum & Forster Specialty Ins Co	AZ	\$762,594	0.13%
32859	Penn Amer Ins Co	PA	\$11,735,831	2.01%	37745	Integon Specialty Ins	NC	\$703,422	0.12%
39020	Essex Ins Co	DE	\$11,539,455	1.98%	35912	American Western Home Ins Co	OK	\$670,465	0.12%
33138	Landmark Amer Ins Co	OK	\$11,112,999	1.91%	11515	QBE Specialty Ins Co	ND	\$604,700	0.10%
36940	Indian Harbor Ins Co	ND	\$10,502,533	1.80%	28053	Rockhill Ins Co	AZ	\$300,300	0.05%
24856	Admiral Ins Co	DE	\$9,644,868	1.66%	20010	Acceptance Ind Ins Co	NE	\$243,437	0.04%
25895	United States Liability Ins Co	PA	\$9,181,129	1.58%	21334	Empire Ind Ins Co	OK	\$226,200	0.04%
42374	Houston Cas Co	TX	\$9,075,953	1.56%	39640	Firemans Fund Ins Co Of OH	OH	\$132,794	0.02%
39993	Colony Ins Co	VA	\$8,518,293	1.46%	17159	Usf Ins Co	PA	\$127,229	0.02%
26620	AXIS Surplus Ins Co	IL	\$7,519,952	1.29%	36951	Century Surety Co	OH	\$72,393	0.01%
10046	Pacific Ins Co Ltd	CT	\$7,022,606	1.21%	40428	Voyager Ind Ins Co	GA	\$70,685	0.01%
22829	Interstate Fire & Cas Co	IL	\$6,680,605	1.15%	38954	ProAssurance Cas Co	MI	\$65,277	0.01%
35351	American Empire Surplus Lines Ins Co	DE	\$6,632,716	1.14%	19607	XL Select	OK	\$51,088	0.01%
38989	Chubb Custom Ins Co	DE	\$6,450,254	1.11%	34991	Genesis Ind Ins Co	ND	\$21,753	0.00%
37362	General Star Ind Co	CT	\$5,617,865	0.96%	10316	Appalachian Ins Co	RI	\$13,491	0.00%
19489	Allied World Assur Co US Inc	DE	\$5,611,411	0.96%	43095	Clarendon Amer Ins Co	NJ	\$9,094	0.00%
37974	MT Hawley Ins Co	KS	\$5,511,766	0.95%	11231	Generali Us Branch	NY	\$6,105	0.00%
21199	Arch Specialty Ins Co	WI	\$5,468,565	0.94%	10213	Discover Specialty Ins Co	IL	\$2,511	0.00%
10657	First Mercury Ins Co	IL	\$5,415,057	0.93%	12961	Omega US Ins Inc	DE	\$747	0.00%
37532	Great Amer E&S Ins Co	DE	\$5,048,147	0.87%	11100	Safeco Surplus Lines Ins Co	WA	\$2	0.00%
10725	Liberty Surplus Ins Corp	NH	\$4,986,543	0.86%	Total Direct Written Premium				\$582,566,804 100.00%
33189	Max Specialty Ins Co	DE	\$4,454,048	0.76%					
12537	United Specialty Ins Co	DE	\$4,296,603	0.74%					
17400	Noetic Specialty Ins Co	IL	\$4,222,382	0.72%					
13064	United Natl Ins Co	PA	\$3,885,851	0.67%					
41718	Endurance Amer Specialty Ins Co	DE	\$3,858,519	0.66%					
24015	Northland Ins Co	MN	\$3,663,648	0.63%					
20079	National Fire & Marine Ins Co	NE	\$3,341,841	0.57%					
11177	First Fin Ins Co	IL	\$3,308,249	0.57%					
29696	Travelers Excess & Surplus Lines Co	CT	\$3,265,555	0.56%					
10833	Gemini Ins Co	DE	\$3,036,384	0.52%					
26743	Maxum Ind Co	DE	\$3,010,103	0.52%					
18376	Hermitage Ins Co	NY	\$2,981,197	0.51%					
24319	Darwin Select Ins Co	AR	\$2,909,235	0.50%					
12203	James River Ins Co	OH	\$2,694,478	0.46%					
34452	Homeland Ins Co of NY	NY	\$2,662,833	0.46%					
34916	First Specialty Ins Corp	MO	\$2,555,579	0.44%					
25038	North Amer Capacity Ins Co	NH	\$2,513,586	0.43%					
15989	Catlin Specialty Ins Co	DE	\$2,304,761	0.40%					
10851	Everest Ind Ins Co	DE	\$2,283,005	0.39%					
30481	St Paul Surplus Lines Ins Co	DE	\$2,240,567	0.38%					
37079	Hudson Specialty Ins Co	NY	\$2,193,600	0.38%					
10786	Princeton Excess & Surplus Lines Ins	DE	\$1,982,141	0.34%					
37150	Western Heritage Ins Co	AZ	\$1,850,074	0.32%					
37982	Tudor Ins Co	NH	\$1,842,629	0.32%					
10328	Capitol Specialty Ins Corp	WI	\$1,821,231	0.31%					
10717	Aspen Specialty Ins Co	ND	\$1,735,084	0.30%					
39608	Nutmeg Ins Co	CT	\$1,647,694	0.28%					
10729	Seneca Specialty Ins Co	AZ	\$1,637,801	0.28%					
42846	Atlantic Cas Ins Co	NC	\$1,583,086	0.27%					



## 2008 Premium and Market Share - TITLE INSURANCE

	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
	50814	First Amer Title Ins Co	CA	\$64,271,358	34.40%
	50121	Stewart Title Guaranty Co	TX	\$24,863,023	13.31%
	50520	Old Republic Natl Title Ins Co	MN	\$18,193,201	9.74%
	50024	Lawyers Title Ins Corp	NE	\$16,219,633	8.68%
	50083	Commonwealth Land Title Ins Co	NE	\$15,626,382	8.36%
	51586	Fidelity Natl Title Ins Co	CA	\$15,486,288	8.29%
	50229	Chicago Title Ins Co	NE	\$14,314,008	7.66%
	51268	Connecticut Attorneys Title Ins Co	CT	\$6,628,130	3.55%
	50067	Ticor Title Ins Co	CA	\$5,966,400	3.19%
	51020	National Title Ins Of NY Inc	NY	\$1,641,882	0.88%
	50016	Title Resources Guaranty Co	TX	\$1,494,164	0.80%
	51624	United General Title Ins Co	CA	\$1,100,963	0.59%
	12234	Equity Natl Title Ins Co	MA	\$389,779	0.21%
	50020	Dakota Homestead Title Ins Co	SD	\$379,750	0.20%
	51535	Ticor Title Ins Co of FL	NE	\$234,911	0.13%
	50636	Censtar Title Ins Co	TX	\$17,346	0.01%
	51632	EnTitle Ins Co	OH	\$5,128	0.00%
	51411	American Guar Title Ins Co	OK	\$200	0.00%
	Total Direct Written Premium			\$186,832,546	100.00%

## 2008 Premium and Market Share - WORKERS' COMPENSATION

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
19429	Insurance Co Of The State Of PA	PA	\$65,507,974	7.56%	20478	National Fire Ins Co Of Hartford	IL	\$3,825,003	0.44%
33758	Associated Industries Of MA Mut Ins	MA	\$61,681,988	7.12%	16551	Savers Prop & Cas Ins Co	MO	\$3,770,171	0.44%
23809	Granite State Ins Co	PA	\$35,872,925	4.14%	22357	Hartford Accident & Ind Co	CT	\$3,769,192	0.44%
29459	Twin City Fire Ins Co Co	IN	\$34,348,456	3.96%	24988	Sentry Ins A Mut Co	WI	\$3,574,190	0.41%
25674	Travelers Property Cas Co Of Amer	CT	\$32,781,803	3.78%	13374	Arrow Mut Liab Ins Co	MA	\$3,553,941	0.41%
42404	Liberty Ins Corp	IL	\$32,735,642	3.78%	24171	Netherlands Ins Co The	NH	\$3,113,363	0.36%
44326	Atlantic Charter Ins Co	MA	\$22,654,209	2.61%	24147	Old Republic Ins Co	PA	\$2,789,001	0.32%
23035	Liberty Mut Fire Ins Co	WI	\$22,620,156	2.61%	25623	Phoenix Ins Co	CT	\$2,285,569	0.26%
23043	Liberty Mut Ins Co	MA	\$20,753,670	2.40%	20346	Pacific Ind Co	WI	\$2,257,920	0.26%
19380	American Home Assur Co	NY	\$20,744,814	2.39%	26182	Harleysville Worcester Ins Co	PA	\$2,228,562	0.26%
19445	National Union Fire Ins Co Of Pitts	PA	\$20,169,699	2.33%	33588	First Liberty Ins Corp	IA	\$2,207,195	0.25%
40142	American Zurich Ins Co	IL	\$18,396,360	2.12%	11150	Arch Ins Co	MO	\$2,163,559	0.25%
19410	Commerce & Industry Ins Co	NY	\$16,668,068	1.92%	13706	Dorchester Mut Ins Co	MA	\$2,137,949	0.25%
11104	Associated Employers Ins Co	MA	\$16,037,181	1.85%	40177	Paramount Ins Co	NY	\$2,106,187	0.24%
16535	Zurich American Ins Co	NY	\$15,640,464	1.81%	20222	All Amer Ins Co	OH	\$2,083,994	0.24%
30104	Hartford Underwriters Ins Co	CT	\$13,598,649	1.57%	21105	North River Ins Co	NJ	\$2,064,347	0.24%
29424	Hartford Cas Ins Co	IN	\$12,472,591	1.44%	21172	Vanliner Ins Co	MO	\$2,001,571	0.23%
25658	Travelers Ind Co	CT	\$12,471,973	1.44%	19356	Maryland Cas Co	MD	\$1,974,920	0.23%
12886	Massachusetts Employers Ins Co	MA	\$11,907,292	1.37%	13935	Federated Mut Ins Co	MN	\$1,873,828	0.22%
11984	Independence Cas Ins Co	MA	\$11,813,429	1.36%	25984	Graphic Arts Mut Ins Co	NY	\$1,842,384	0.21%
37478	Hartford Ins Co Of The Midwest	IN	\$11,783,142	1.36%	12262	Pennsylvania Manufacturers Assoc Ins	PA	\$1,747,787	0.20%
19038	Travelers Cas & Surety Co	CT	\$11,291,883	1.30%	33600	LM Ins Corp	IA	\$1,718,855	0.20%
25682	Travelers Ind Co Of CT	CT	\$10,773,129	1.24%	24139	Old Republic Gen Ins Corp	IL	\$1,652,038	0.19%
31470	Norguard Ins Co	PA	\$10,604,943	1.22%	28258	Continental Ind Co	IA	\$1,537,417	0.18%
23841	New Hampshire Ins Co	PA	\$9,481,395	1.09%	12475	Republic-Franklin Ins Co	OH	\$1,462,529	0.17%
41360	Arbella Protection Ins Co	MA	\$9,459,654	1.09%	26425	Wausau General Ins Co	WI	\$1,459,122	0.17%
20443	Continental Cas Co	IL	\$9,451,774	1.09%	25976	Utica Mut Ins Co	NY	\$1,449,246	0.17%
20281	Federal Ins Co	IN	\$9,078,470	1.05%	26247	American Guar & Liab Ins	NY	\$1,406,141	0.16%
19682	Hartford Fire In Co	CT	\$9,033,126	1.04%	20397	Vigilant Ins Co	NY	\$1,366,841	0.16%
31325	Acadia Ins Co	NH	\$8,597,799	0.99%	12777	Chubb Ind Ins Co	NY	\$1,326,494	0.15%
20508	Valley Forge Ins Co	PA	\$8,465,840	0.98%	19372	Northern Ins Co Of NY	NY	\$1,302,417	0.15%
25666	Travelers Ind Co Of Amer	CT	\$8,364,570	0.97%	31534	Citizens Ins Co Of Amer	MI	\$1,300,388	0.15%
18023	Star Ins Co	MI	\$7,462,925	0.86%	13978	Florists Mut Ins Co	IL	\$1,224,218	0.14%
42376	Technology Ins Co Inc	NH	\$6,978,354	0.81%	20621	OneBeacon Amer Ins Co	MA	\$1,189,951	0.14%
24198	Peerless Ins Co	NH	\$6,532,673	0.75%	19305	Assurance Co Of Amer	NY	\$1,169,218	0.13%
22667	Ace Amer Ins Co	PA	\$6,197,605	0.72%	12904	Tokio Marine & Nichido Fire Ins Co	NY	\$1,141,408	0.13%
10804	Continental Western Ins Co	IA	\$5,732,426	0.66%	25844	Union Ins Co	IA	\$1,041,727	0.12%
21784	Firemens Ins Co Of Washington DC	DE	\$5,546,235	0.64%	24074	Ohio Cas Ins Co	OH	\$1,039,041	0.12%
13803	Farm Family Cas Ins Co	NY	\$5,517,343	0.64%	25224	Great Divide Ins Co	ND	\$1,000,483	0.12%
26042	Wausau Underwriters Ins Co	WI	\$5,459,315	0.63%	20427	American Cas Co Of Reading PA	PA	\$982,236	0.11%
21113	United States Fire Ins Co	DE	\$5,407,542	0.62%	29939	Main St Amer Assur Co	FL	\$974,924	0.11%
14702	Eastguard Ins Co	PA	\$5,378,468	0.62%	28460	Sentry Cas Co	WI	\$956,565	0.11%
26069	Wausau Business Ins Co	WI	\$5,322,286	0.61%	21857	American Ins Co	OH	\$937,130	0.11%
19801	Argonaut Ins Co	IL	\$5,025,310	0.58%	37885	XL Specialty Ins Co	DE	\$923,432	0.11%
14788	NGM Ins Co	FL	\$4,928,890	0.57%	19704	American States Ins Co	IN	\$909,289	0.10%
21458	Employers Ins of Wausau	WI	\$4,921,682	0.57%	24414	General Cas Co Of WI	WI	\$891,836	0.10%
42390	Amguard Ins Co	PA	\$4,914,891	0.57%	20362	Mitsui Sumitomo Ins Co of Amer	NY	\$869,025	0.10%
10664	Endeavour Ins Co	MA	\$4,884,496	0.56%	39926	Selective Ins Co Of The Southeast	IN	\$835,707	0.10%
20230	Central Mut Ins Co	OH	\$4,763,731	0.55%	21180	Sentry Select Ins Co	WI	\$824,622	0.10%
25615	Charter Oak Fire Ins Co	CT	\$4,712,760	0.54%	23442	Patriot Gen Ins Co	WI	\$779,946	0.09%
20648	Employers Fire Ins Co	MA	\$4,662,822	0.54%	19720	American Alt Ins Corp	DE	\$764,161	0.09%
23965	Norfolk & Dedham Mut Fire Ins Co	MA	\$4,610,213	0.53%	19259	Selective Ins Co Of SC	IN	\$734,273	0.08%
43575	Indemnity Ins Co Of North Amer	PA	\$4,457,670	0.51%	37257	Praetorian Ins Co	IL	\$707,753	0.08%
10017	Arbella Ind Ins Co	MA	\$4,386,010	0.51%	13714	Pharmacists Mut Ins Co	IA	\$684,358	0.08%
11045	Excelsior Ins Co	NH	\$4,363,015	0.50%	20699	Ace Prop & Cas Ins Co	PA	\$664,073	0.08%
20494	Transportation Ins Co	IL	\$4,177,411	0.48%	23817	Illinois Natl Ins Co	IL	\$656,624	0.08%
21261	Electric Ins Co	MA	\$3,987,039	0.46%	18767	Church Mut Ins Co	WI	\$652,605	0.08%
15059	Public Service Mut Ins Co	NY	\$3,913,324	0.45%	20303	Great Northern Ins Co	IN	\$647,786	0.07%
11030	Memic Ind Co	NH	\$3,890,936	0.45%	35386	Fidelity & Guar Ins Co	IA	\$643,863	0.07%
22292	Hanover Ins Co	NH	\$3,827,359	0.44%	37303	Redland Ins Co	NJ	\$633,075	0.07%

NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008	NAIC #	Company Name	State	Premium Written in MA as of 12/31/2008	Market Share in MA as of 12/31/2008
25887	US Fidelity & Guaranty Co	MD	\$611,480	0.07%	20613	Sparta Ins Co	MA	\$44,938	0.01%
13083	Employers Security Assur Co	MA	\$607,607	0.07%	32271	Dallas Natl Ins Co	TX	\$42,064	0.00%
10665	Ameritrust Ins Corp	MI	\$603,028	0.07%	22918	American Motorists Ins Co	IL	\$39,576	0.00%
23329	Merchants Mut Ins Co	NY	\$585,945	0.07%	10205	Mountain Valley Ind Co	NH	\$36,569	0.00%
36064	Hanover Amer Ins Co	NH	\$551,734	0.06%	44393	West American Ins Co	IN	\$35,504	0.00%
44300	Tower Ins Co Of NY	NY	\$513,797	0.06%	13269	Zenith Ins Co	CA	\$31,266	0.00%
15067	Quincy Mut Fire Ins Co	MA	\$499,525	0.06%	22977	Lumbermens Mut Cas Co	IL	\$27,426	0.00%
15105	Safety Natl Cas Corp	MO	\$498,197	0.06%	43702	Tower National Ins Co	MA	\$24,295	0.00%
19402	AIG Cas Co	PA	\$446,870	0.05%	11123	Safety First Ins Co	IL	\$20,802	0.00%
14982	Penn Millers Ins Co	PA	\$435,361	0.05%	23108	Lumbermens Underwriting Alliance	MO	\$20,758	0.00%
21873	Firemans Fund Ins Co	CA	\$423,850	0.05%	16691	Great Amer Ins Co	OH	\$15,572	0.00%
12416	Protective Ins Co	IN	\$423,598	0.05%	19984	ACIG Ins Co	IL	\$14,677	0.00%
13943	Fitchburg Mut Ins Co	MA	\$396,686	0.05%	27073	Nipponkoa Ins Co Ltd US Br	NY	\$14,493	0.00%
19690	American Economy Ins Co	IN	\$378,181	0.04%	28304	Federated Serv Ins Co	MN	\$13,821	0.00%
25011	Wesco Ins Co	DE	\$377,938	0.04%	22748	Pacific Employers Ins Co	PA	\$12,692	0.00%
22306	Massachusetts Bay Ins Co	NH	\$373,386	0.04%	24791	St Paul Mercury Ins Co	MN	\$12,437	0.00%
23434	Middlesex Ins Co	WI	\$364,767	0.04%	24732	General Ins Co Of Amer	WA	\$9,981	0.00%
12831	State Natl Ins Co Inc	TX	\$358,556	0.04%	23396	Amerisure Mut Ins Co	MI	\$9,484	0.00%
28886	Transguard Ins Co Of Amer Inc	IL	\$329,704	0.04%	21849	American Automobile Ins Co	MO	\$7,996	0.00%
22136	Great Amer Ins Co of NY	NY	\$326,947	0.04%	24082	Ohio Security Ins Co	OH	\$6,254	0.00%
35696	Harleysville Preferred Ins Co	PA	\$312,218	0.04%	12304	Accident Fund Gen Ins Co	MI	\$2,942	0.00%
23582	Harleysville Ins Co	PA	\$293,741	0.03%	20532	Clarendon Natl Ins Co	NJ	\$1,821	0.00%
21865	Associated Ind Corp	CA	\$268,789	0.03%	13331	American Hardware Mut Ins Co	OH	\$1,477	0.00%
21415	Employers Mut Cas Co	IA	\$266,853	0.03%	31194	Travelers Cas & Surety Co Of Amer	CT	\$1,072	0.00%
39306	Fidelity & Deposit Co Of MD	MD	\$262,096	0.03%	24554	XL Ins Amer Inc	DE	\$780	0.00%
11126	Sompo Japan Ins Co of Amer	NY	\$252,362	0.03%	14990	Pennsylvania Natl Mut Cas Ins Co	PA	\$280	0.00%
26832	Great Amer Alliance Ins Co	OH	\$240,364	0.03%	18538	Bancinsure Inc	OK	\$151	0.00%
32620	National Interstate Ins Co	OH	\$232,378	0.03%	23787	Nationwide Mut Ins Co	OH	\$151	0.00%
23337	American European Ins Co	NH	\$230,606	0.03%	12305	Accident Fund Natl Ins Co	MI	\$81	0.00%
12901	Merchants Preferred Ins Co	NY	\$218,165	0.03%	20095	Bituminous Cas Corp	IL	\$18	0.00%
11149	Maine Employers Mut Ins Co	ME	\$178,837	0.02%	Total Direct Written Premium				\$866,374,349 100.00%
29874	North Amer Specialty Ins Co	NH	\$173,505	0.02%					
10677	Cincinnati Ins Co	OH	\$172,373	0.02%					
37893	Ullico Cas Co	DE	\$168,393	0.02%					
41181	Universal Underwriters Ins Co	KS	\$163,414	0.02%					
10642	Cherokee Ins Co	MI	\$160,412	0.02%					
21970	OneBeacon Ins Co	PA	\$151,049	0.02%					
18333	Peerless Ind Ins Co	IL	\$150,577	0.02%					
20702	Ace Fire Underwriters Ins Co	PA	\$141,299	0.02%					
10120	Everest Natl Ins Co	DE	\$138,306	0.02%					
24066	American Fire & Cas Co	OH	\$137,512	0.02%					
21881	National Surety Corp	IL	\$122,649	0.01%					
42552	Nova Cas Co	NY	\$119,647	0.01%					
22187	Greater NY Mut Ins Co	NY	\$113,802	0.01%					
10166	Accident Fund Ins Co of Amer	MI	\$107,345	0.01%					
19828	Argonaut Midwest Ins Co	IL	\$97,962	0.01%					
12297	Petroleum Cas Co	TX	\$93,734	0.01%					
11371	Great West Cas Co	NE	\$71,333	0.01%					
39845	Westport Ins Corp	MO	\$70,626	0.01%					
36234	Preferred Professional Ins Co	NE	\$69,998	0.01%					
23612	Midwest Employers Cas Co	DE	\$69,642	0.01%					
41238	Trans Pacific Ins Co	NY	\$66,036	0.01%					
15563	SeaBright Ins Co	IL	\$64,643	0.01%					
24449	Regent Ins Co	WI	\$63,005	0.01%					
22322	Greenwich Ins Co	DE	\$57,563	0.01%					
12866	T.H.E. Ins Co	LA	\$57,492	0.01%					
25879	Fidelity & Guar Ins Underwriters Inc	WI	\$54,313	0.01%					
15032	Guideone Mut Ins Co	IA	\$52,233	0.01%					
19488	Amerisure Ins Co	MI	\$47,677	0.01%					
25143	State Farm Fire And Cas Co	IL	\$47,616	0.01%					