

2014

Report on Review of the Data
Call Pursuant to House Bill 119 –
Motor Vehicle Personal Injury
Protection (PIP) Insurance

January 1, 2015



FLORIDA OFFICE OF
INSURANCE REGULATION

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I. Introduction and History

Pursuant to Section 16 of House Bill (HB) 119 of the 2012 Regular Session, the Office Of Insurance Regulation has performed a comprehensive personal injury protection (PIP) data call. In an effort to provide more useful information concerning market conditions and the impact of reforms contained in HB 119 the data call was expanded to include other Personal Auto liability coverages in addition to PIP. The section specifically required the following elements to be examined:

- Quantity of personal injury protection claims.
- Type or nature of claimants.
- Amount and type of personal injury protection benefits paid and expenses incurred.
- Type and quantity of, and charges for, medical benefits.
- Attorney fees related to bringing and defending actions for benefits.
- Direct earned premiums for personal injury protection coverage, pure loss ratios, pure premiums, and other information related to premiums and losses.
- Licensed drivers and accidents.
- Fraud and enforcement.

No-fault insurance is a type of insurance contract under which insureds are indemnified for losses by their own insurer regardless of fault in the incident generating losses. It is thus a first-party coverage. In Florida, the injured party is also restricted in the right to seek recovery through the civil-justice system for losses caused by other parties. The goal of a no-fault system is to lower costs by providing a certainty of speedy recovery, avoiding expensive litigation over the causes of accidents.

In the 1971 legislative session, Florida adopted a no-fault automobile insurance plan which took effect on January 1, 1972. This plan provides payment for medical, disability, and death benefits. Over the years since it was first adopted, the no-fault system has been criticized for permitting inflated claims, fraud, abuse, and increasing premium and law suits filed to recover PIP benefits. In Special Session A of the 2003 Legislative Session a sunset provision was passed that repealed the no-fault law effective October 1, 2007. However, the no-fault law was reenacted effective January 1, 2008 with several changes (including the use of fee schedules for some services) designed to help control medical costs.

After reenactment of the no-fault system, data demonstrated a significant uptick in the claim experience of PIP coverage. Insurers found it necessary to file increases in excess of 10% per year for a period of time, which were anecdotally attributed to increased fraud activity. This was an impetus for the passage of HB 119.

HB 119 required the Office to contract with an independent consultant to calculate the savings expected as a result of its provisions. The Office submitted a report on the results of the independent consultant’s calculations to the Governor, the President of Senate, and the Speaker of the House of Representatives as required by September 15, 2012. The report may be obtained at www.floir.com/siteDocuments/HB119ImpactAnalystFINAL08202012.pdf and was prepared by Pinnacle Actuarial Resources, Inc. (Pinnacle). Pinnacle provided ranges of possible changes for the various components of the bill including a central impact within that range. Below are the estimated central loss impacts shown in the report by component:

Description of Change	Central Loss Impact Estimate (PIP)
Expansion of Long Form Crash Reports	-0.8%
Insurance Fraud Strike Force	-1.3
Separation of Death Benefit	+0.7
Initial Services within 14 Days	-0.8
Limitation on Non-Emergency Conditions	-12.3
Exclusion of Massage Therapy & Acupuncture	-8.7
Medicare Fee Schedule Fix	-0.8
Refusal to Submit/Failure to Appear at Medical	-0.9
Removal of Contingency Fee Multiplier	-0.2

These impacts were summarized, adjusted for expected overlaps, and adjusted to exclude fixed expenses. The range of possible PIP premium savings was estimated to be between 14.0% and 24.6%, with a central impact estimate of the savings in PIP premiums of 19.5%. Insurers were required to make a filing by October 1, 2012 and another by January 1, 2014 containing a 10-percent and a 25-percent reduction to PIP rates in effect on July 1, 2012, respectively. As an alternative, an insurer could include a detailed explanation of the reasons for failure to achieve those reductions.

There are two factors that complicate any analysis of the impact of HB 119:

- A temporary injunction was granted with respect to those sections of the law requiring a finding of emergency medical condition as a prerequisite for payment of PIP benefits or that prohibit payment of benefits for services provided by acupuncturists, chiropractors and massage therapists issued by a Circuit Court on March 15, 2013. This injunction was reversed by the First District Court of Appeal in an opinion filed October 23, 2013. During the seven months that it was in force, there was inconsistency among insurers in adjustment of claims that involved the subject sections of the law. Since the current data call only contains the first eighteen months of information subsequent to the effective date of its major cost saving provisions and at least seven of those are potentially distorted by the injunction, conclusions from this data call should be regarded as tentative pending more definitive data.

- While the bill contained a section that allowed insurers to implement provisions of the bill without the language being included in the policy form (see Section 8 of the bill – s. 627.7311, F.S.), some insurers did not implement certain provisions until the accident occurred after the issuance of policy (either new or renewal) that contained the provisions of HB 119.

Thirty-five (35) insurers participated in the Data Call, which included the time period from January 1, 2010 to June 30, 2014. The submissions represent 83.5% of the market based on 2013 Private Passenger Auto Direct Written Premium reported to the NAIC, and included all of the top twenty-five (25) insurers. Losses and claims are organized by the quarter during which the accident causing them took place. The data submitted was checked for reasonability, however the report is based on the information as received and no audit of the data has been performed.

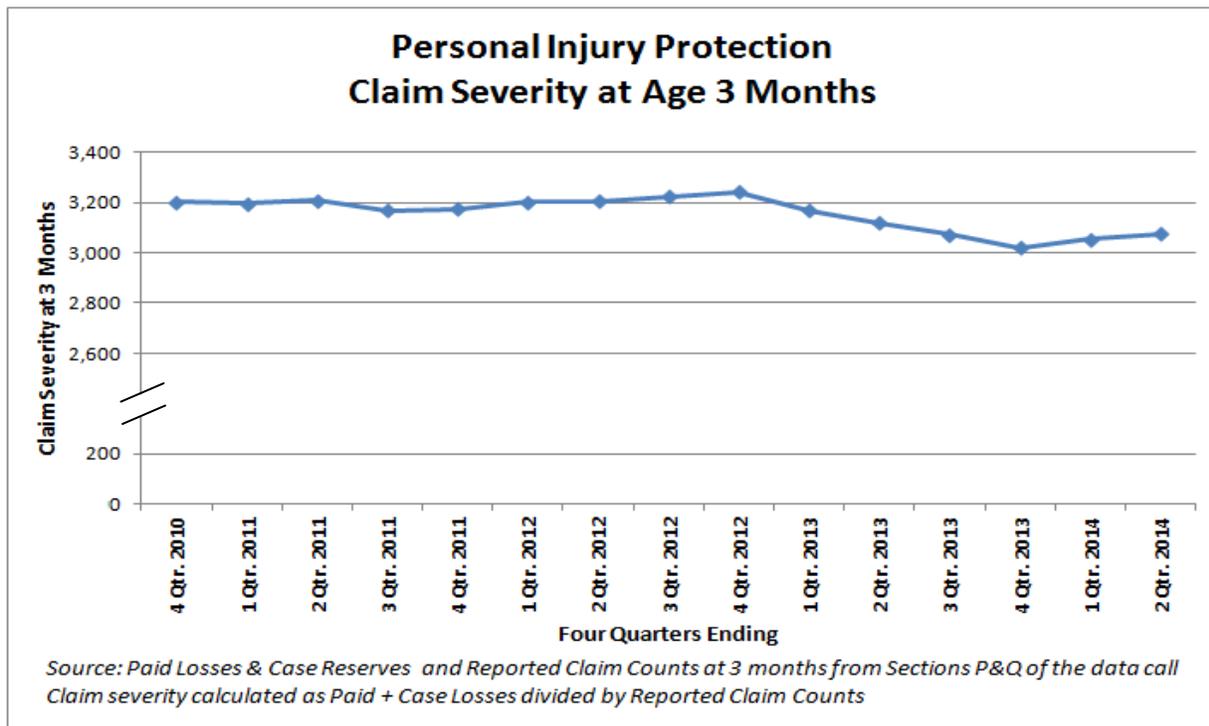
There were several insurers, encompassing approximately 17% of the market, which had to be excluded from the results presented in Section II of this report due to data quality issues. The Office is currently working with these insurers to collect accurate data. It is anticipated that a supplement to this report will be issued, if necessary, once the data has been collected and analyzed.

II. Data and Findings

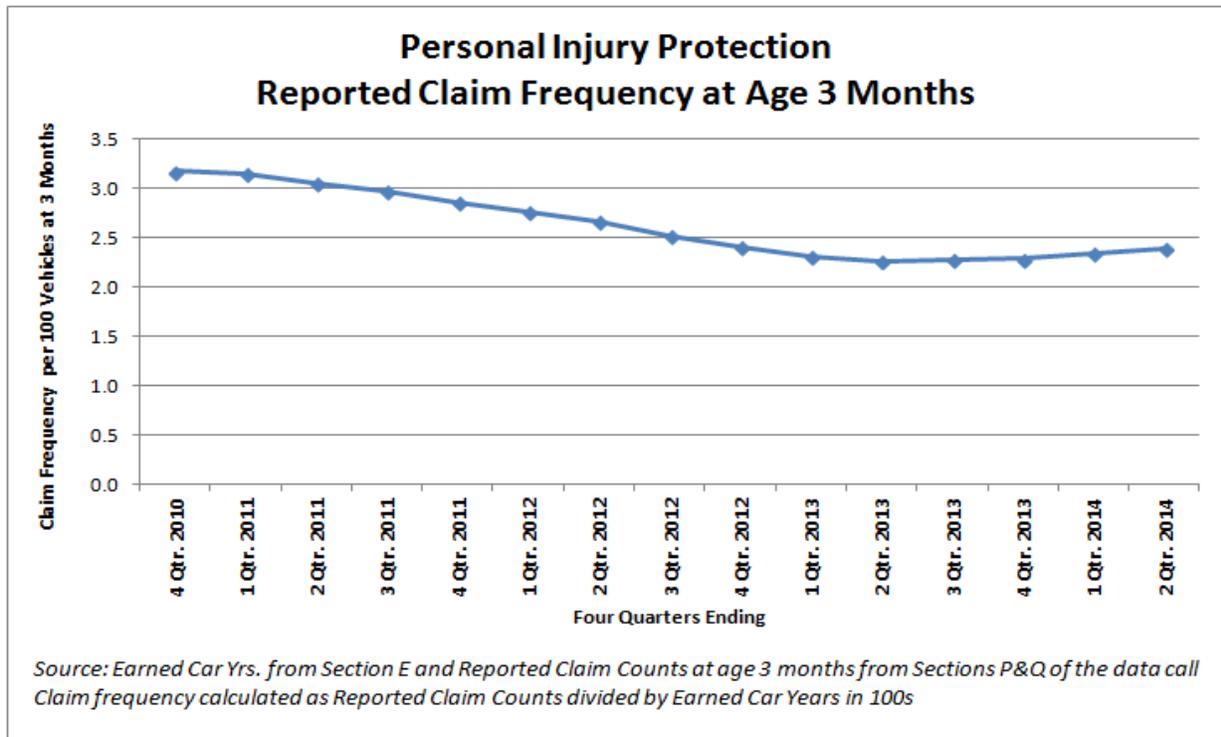
1. Statewide Results

The data call required information to be submitted on an accident quarter basis. This means that the claim information was reported based on when the accident took place, regardless of when the claim was reported to the insurer or when any payments were made. The information on a statewide basis was reported at various stages in development so that factors could be determined to develop the losses reported by accident quarter to its ultimate cost. The data call also required that, in the case of multiple claimants for one occurrence, each individual claimant should be counted as one claim.

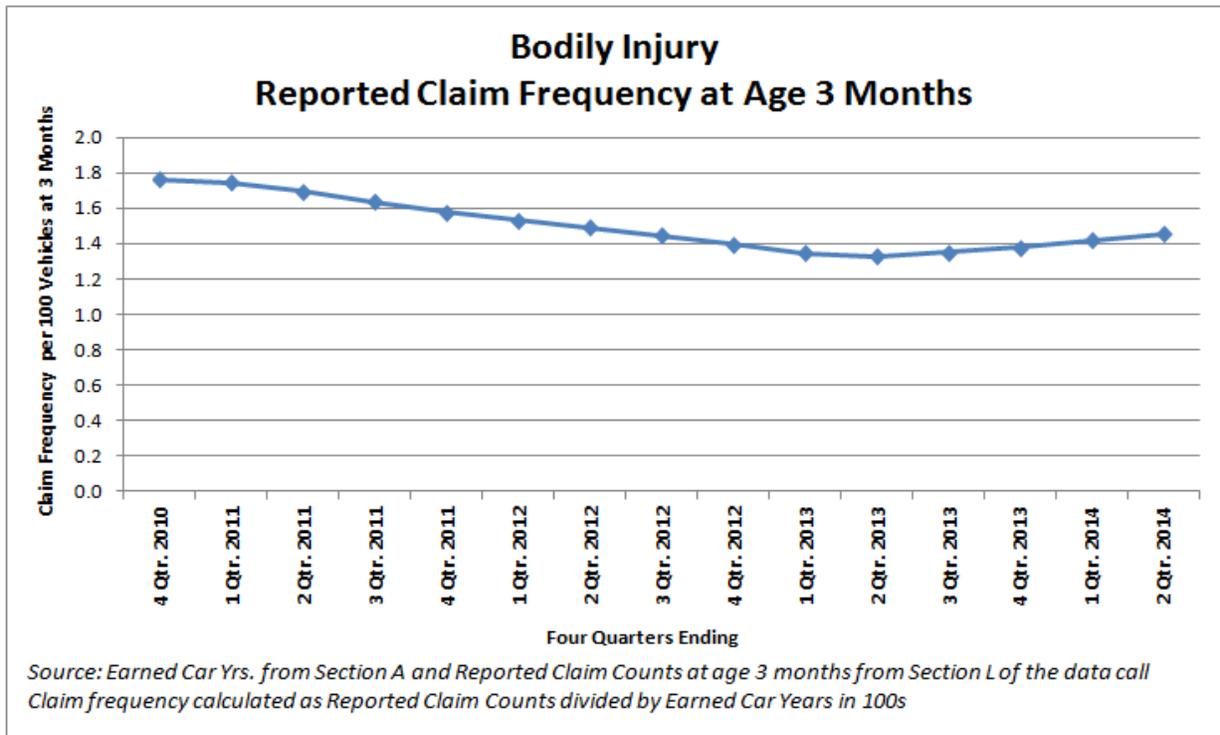
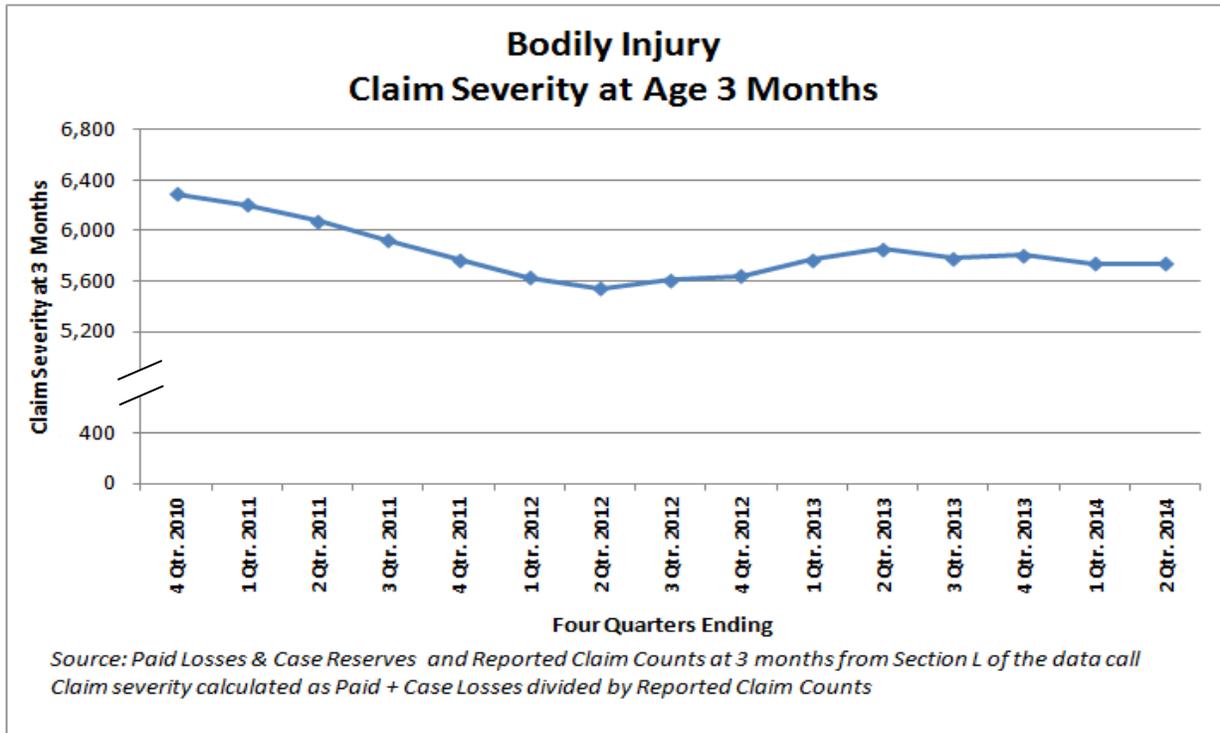
Below is a chart showing the claim severity for PIP. The claim severity was calculated using data at a consistent age (an age of 3 months means that the data in a particular accident quarter was evaluated at the end of that accident quarter). The claim severity was calculated using the reported claim counts, which would include claims that are ultimately closed without payment. As such, the claim severity in the graph below will be considerably lower than severities calculated only using claims that have payments, such as severities calculated using Fast Track Monitoring System data (shown in Section III of this report). To avoid the effects of seasonality, the data was reviewed by looking at the most recent four quarters of information at each quarter. Consistent with other data sources, it appears that claim severity for PIP decreased since the implementation of HB 119 on January 1, 2013.



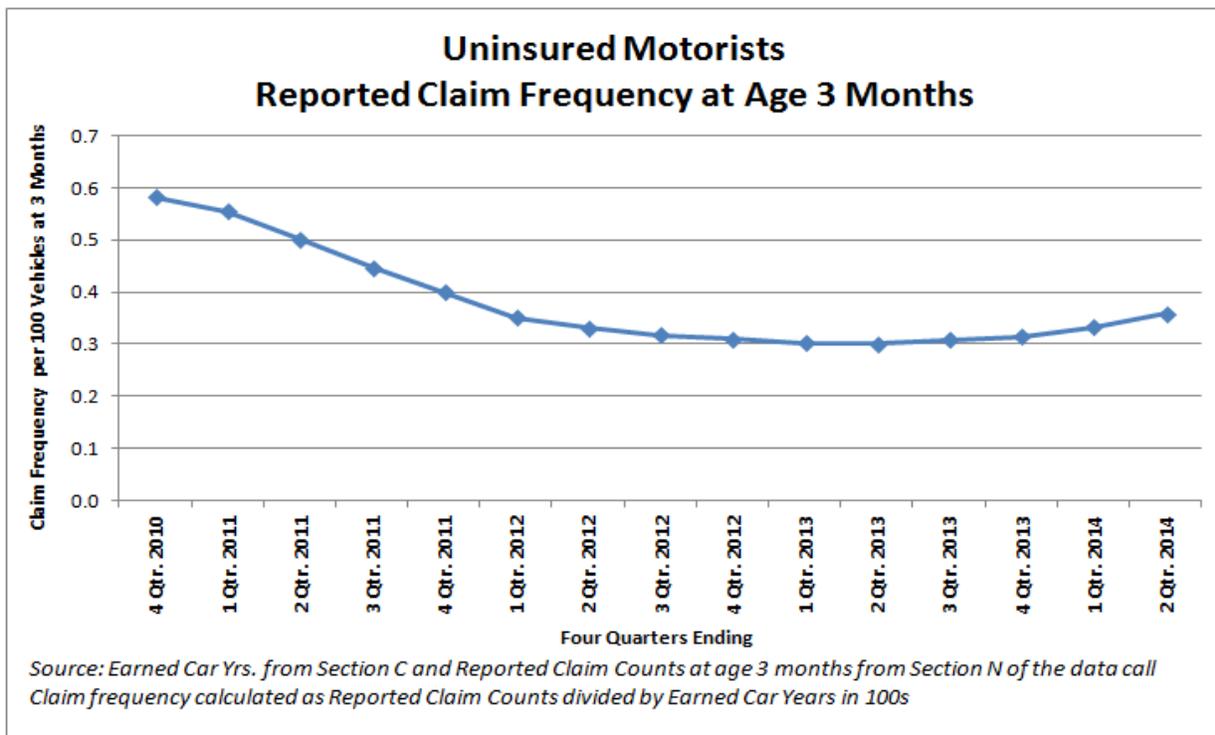
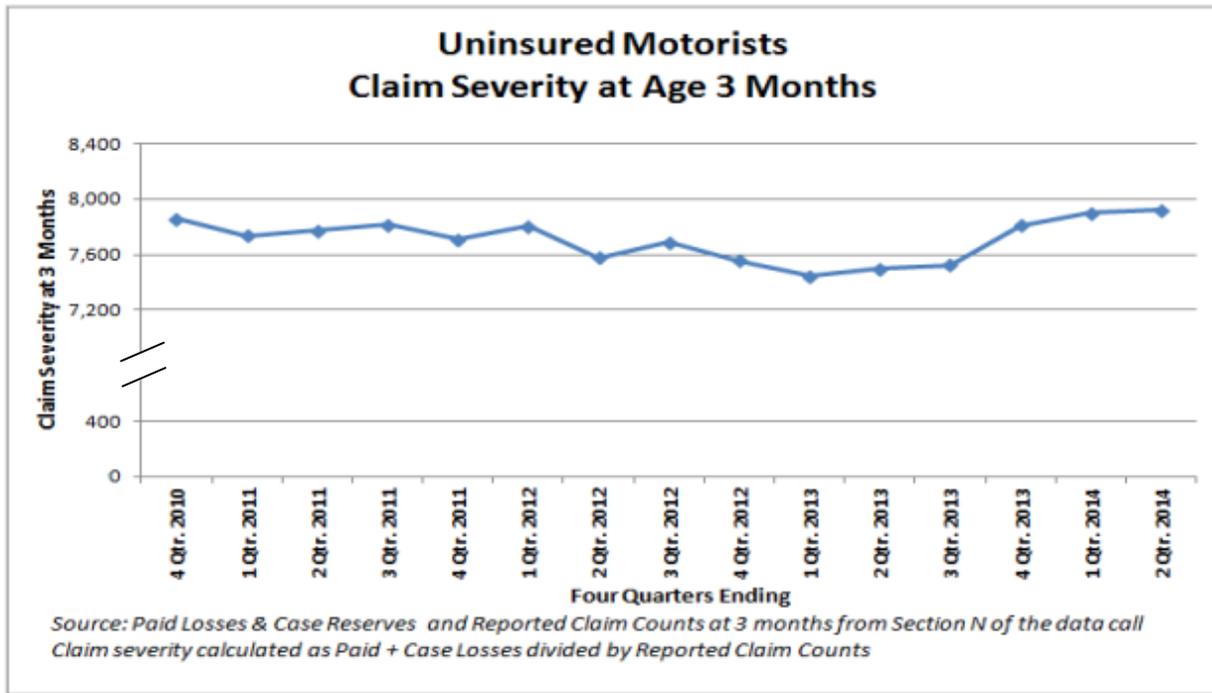
Frequency of PIP claims has in general declined since 2010, although more recent quarters show a slight increase.



The implementation of HB 119 also impacted other coverages, such as Bodily Injury (BI) and Uninsured Motorists (UM), since some benefits that would previously have been covered under PIP would move to BI and UM. On the next page is a graph showing the BI frequency and severity changes. Since 4th quarter 2012, BI frequency has increased about 4.3%, while severity has increased 1.7%.



Since 4th quarter 2012, UM frequency has increased about 15.8%, while severity has increased 4.8%.



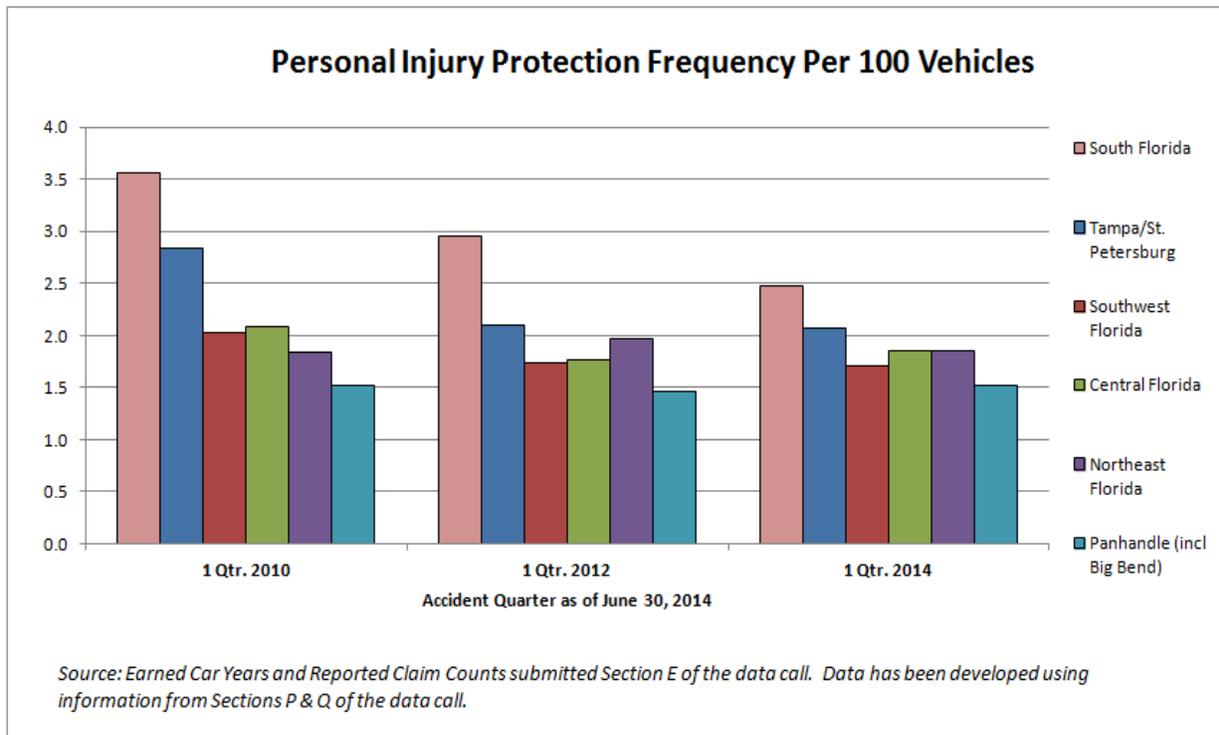
2. Regional Analysis

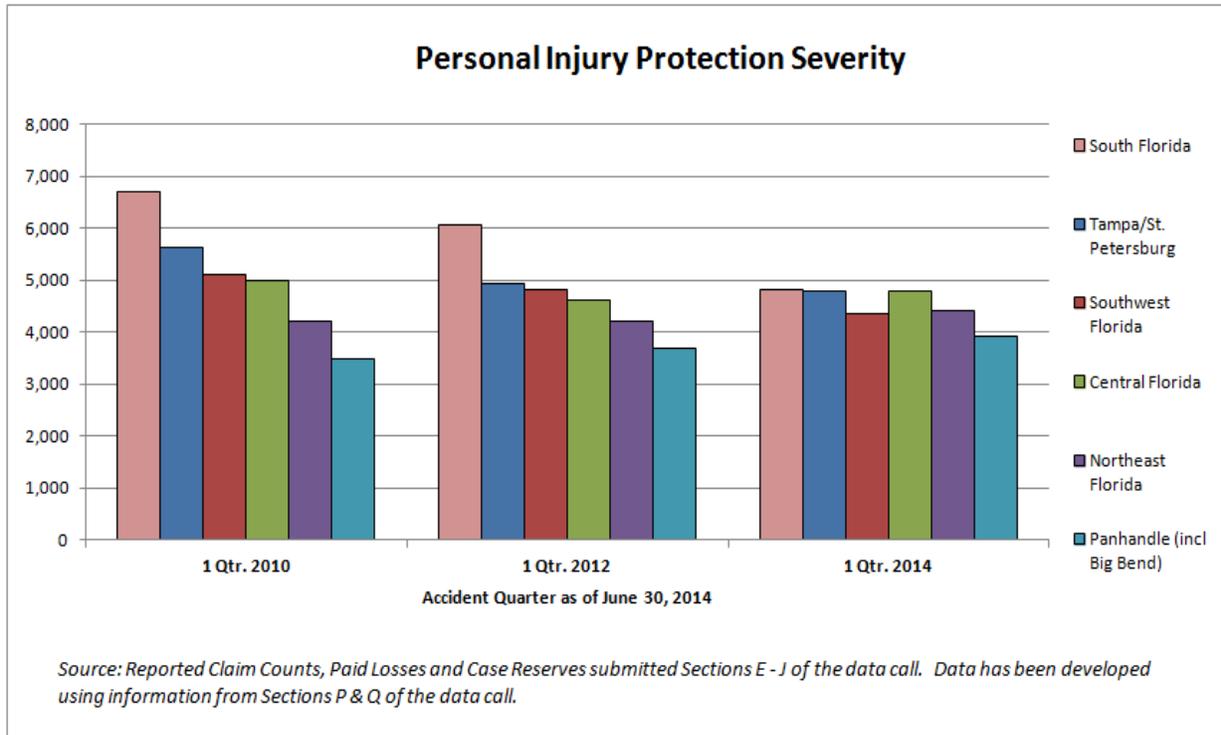
The table below contains the region assignments for the regions that were selected to be included in the graphs in this section.

Region	Counties in Region
South Florida	Palm Beach, Miami-Dade and Broward
Tampa/St. Petersburg	Hillsborough and Pinellas
Southwest Florida	Charlotte, Collier, Lee, Manatee and Sarasota
Central Florida	Brevard, Citrus, Hernando, Lake, Orange, Osceola, Pasco, Polk and Seminole
Northeast Florida	Clay, Duval and Saint Johns
Panhandle (incl Big Bend)	Bay, Calhoun, Escambia, Franklin, Gadsden, Gulf, Holmes, Jackson, Jefferson, Leon, Liberty, Madison, Okaloosa, Santa Rosa, Taylor, Wakulla, Walton and Washington

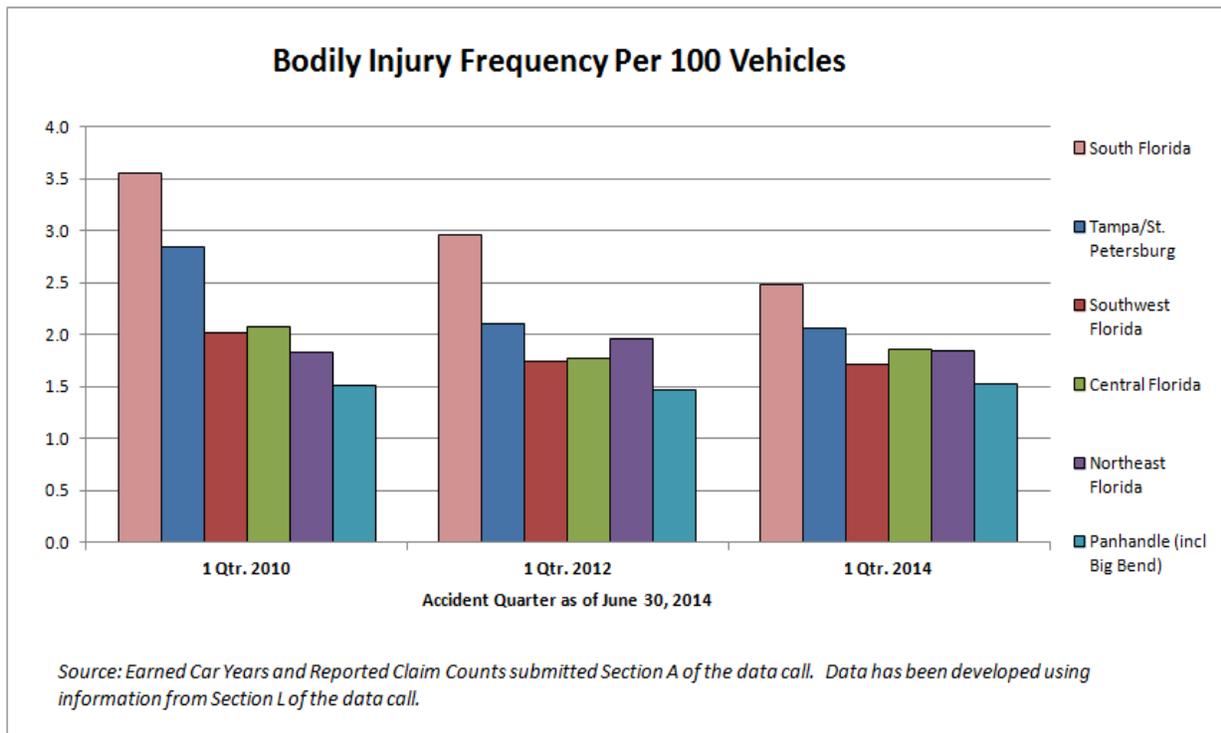
The graphs in this section compare data for accidents that occurred during the first quarter of 2010, 2012 and 2014, evaluated as of June 30, 2014. While 2nd quarter 2014 data was collected, the data is very immature since there has not been much time for the accidents to be reported.

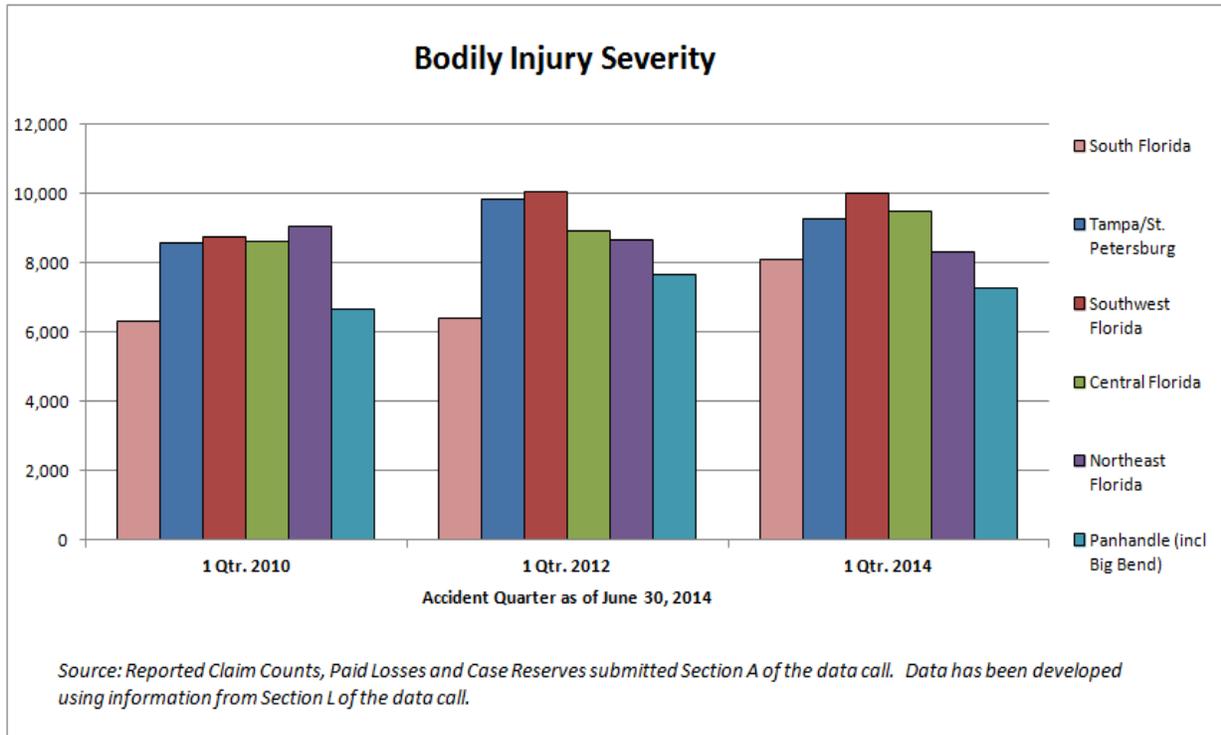
While most regions have experienced significant decreases in both frequency and severity for PIP between 1st quarter 2010 and 1st quarter 2014, the South Florida and Tampa/St. Petersburg regions are the ones that have experienced the most significant decreases.





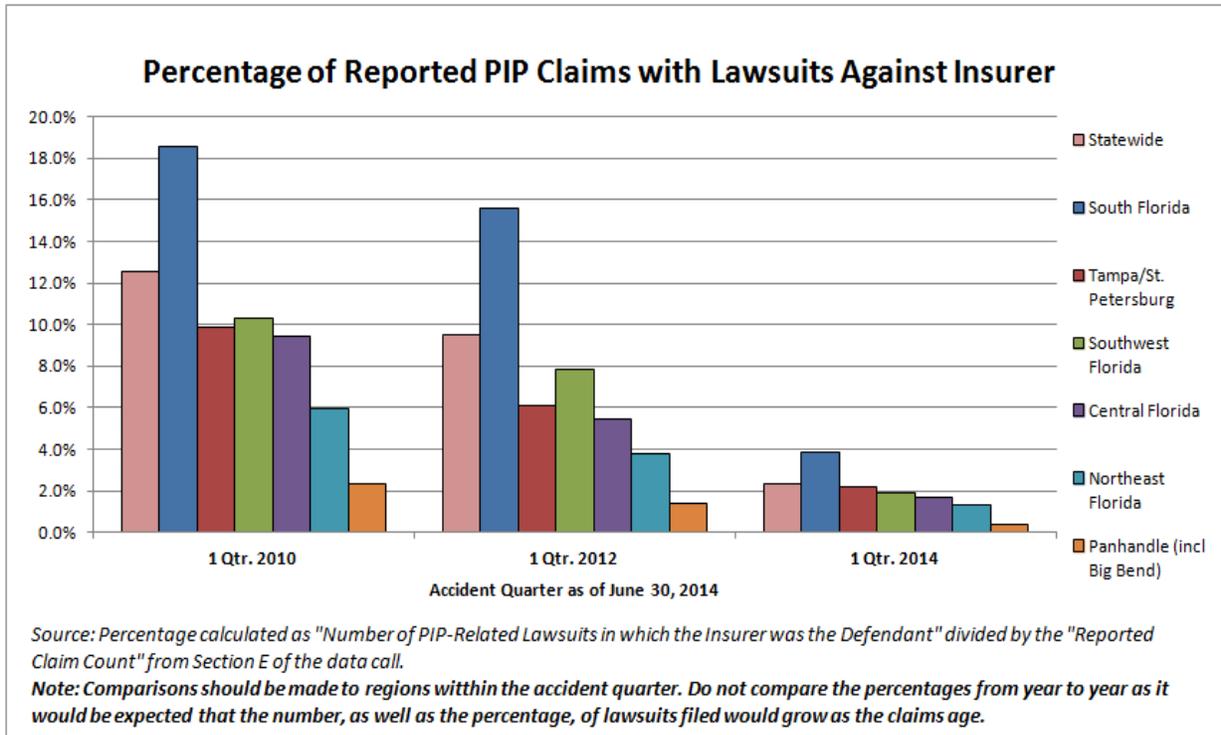
While the South Florida, Tampa/St. Petersburg and Southwest Florida regions have experienced significant decreases in BI frequency between 1st quarter 2010 and 1st quarter 2014, all three regions have experienced increases in BI severity that offset a large portion of the decreases in frequency.



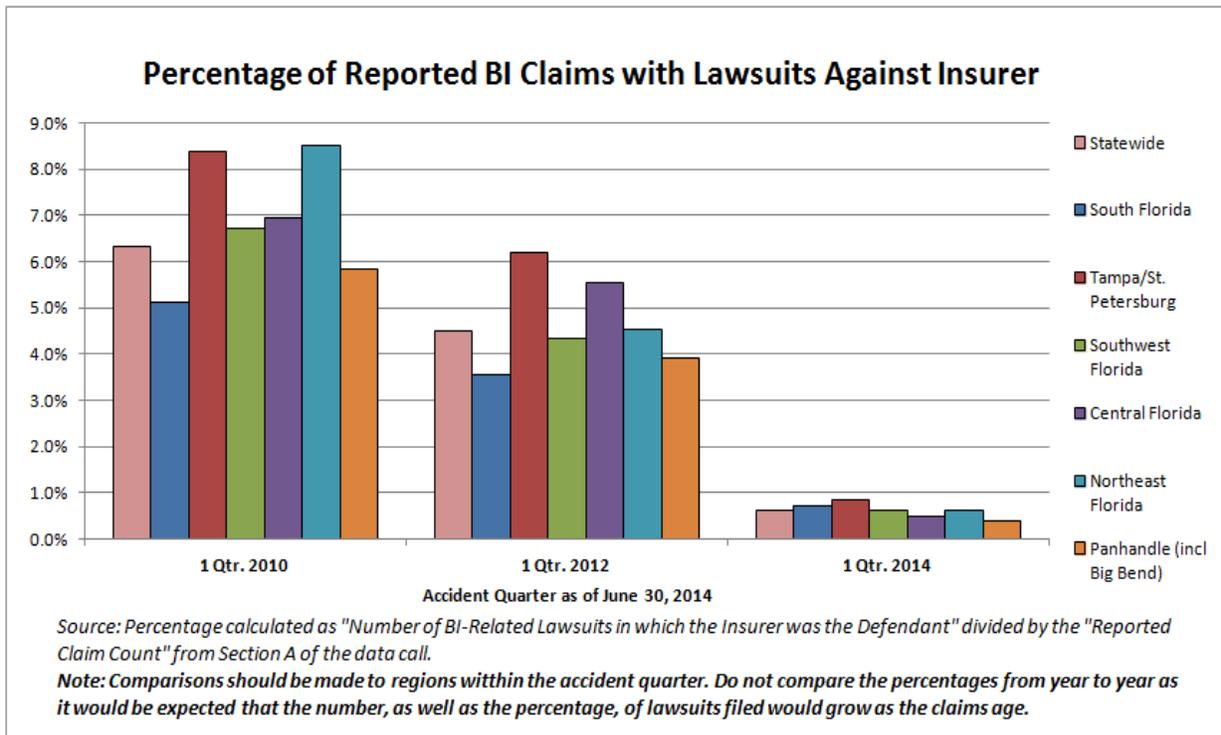


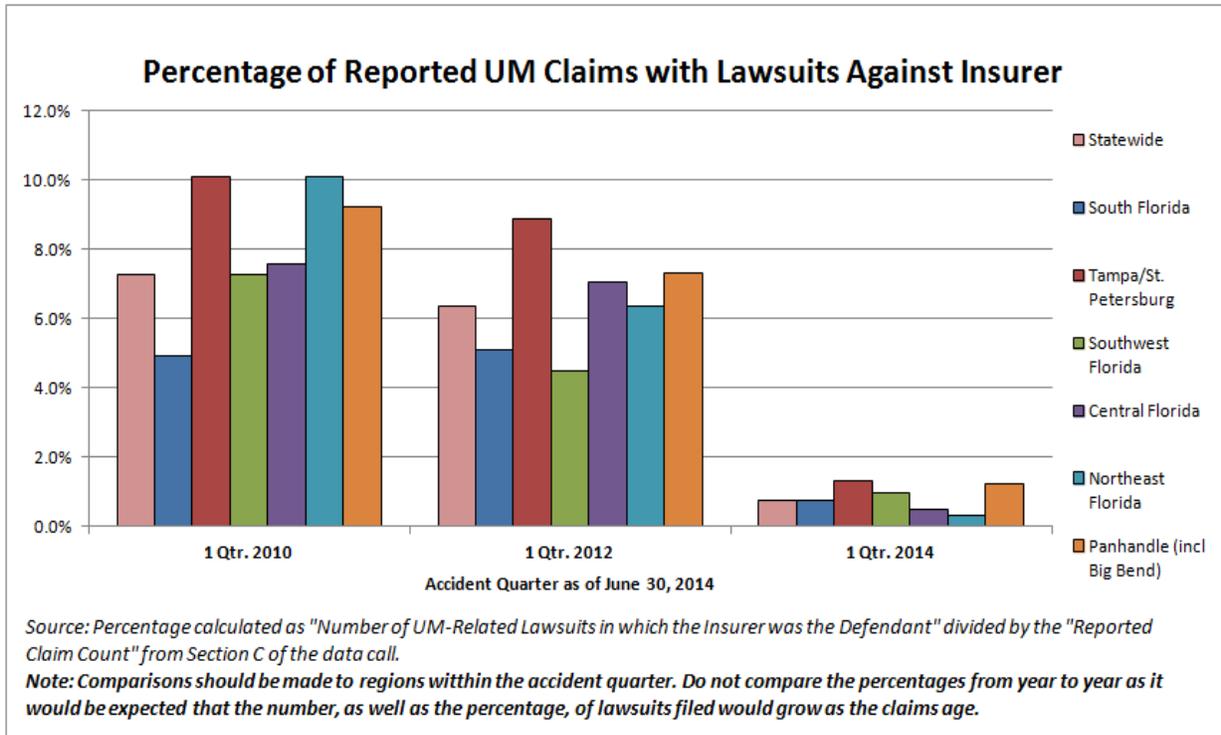
As part of the regional analysis, the Office reviewed the number of claims with a lawsuit where the insurer was a defendant. On the next page is a graph which shows the percentage of reported PIP claims where there was a lawsuit against the insurer by region at 1st quarter 2010, 2012 and 2014. It should be noted that the accident quarters are all evaluated as of June 30, 2014 and none of the claim counts have been developed to its expected ultimate numbers. **As such, comparisons of the percentages should not be made from year to year, as it would be expected that the number, as well as the percentage, of lawsuits filed would grow as the claims age.** Instead, the comparisons should be made by looking at the regional percentages at a given accident quarter.

The South Florida region has a significantly higher percentage of claims where there is a lawsuit against the insurer, when compared with other regions. The gap between the South Florida region and other regions, as well as the statewide average, has narrowed significantly in the 1st quarter of 2014.



In general, the South Florida region has the smaller percentage of lawsuits against insurers for BI and UM than statewide and other regions. With both BI and UM, the Tampa/St. Petersburg region stands out as a higher than average region.

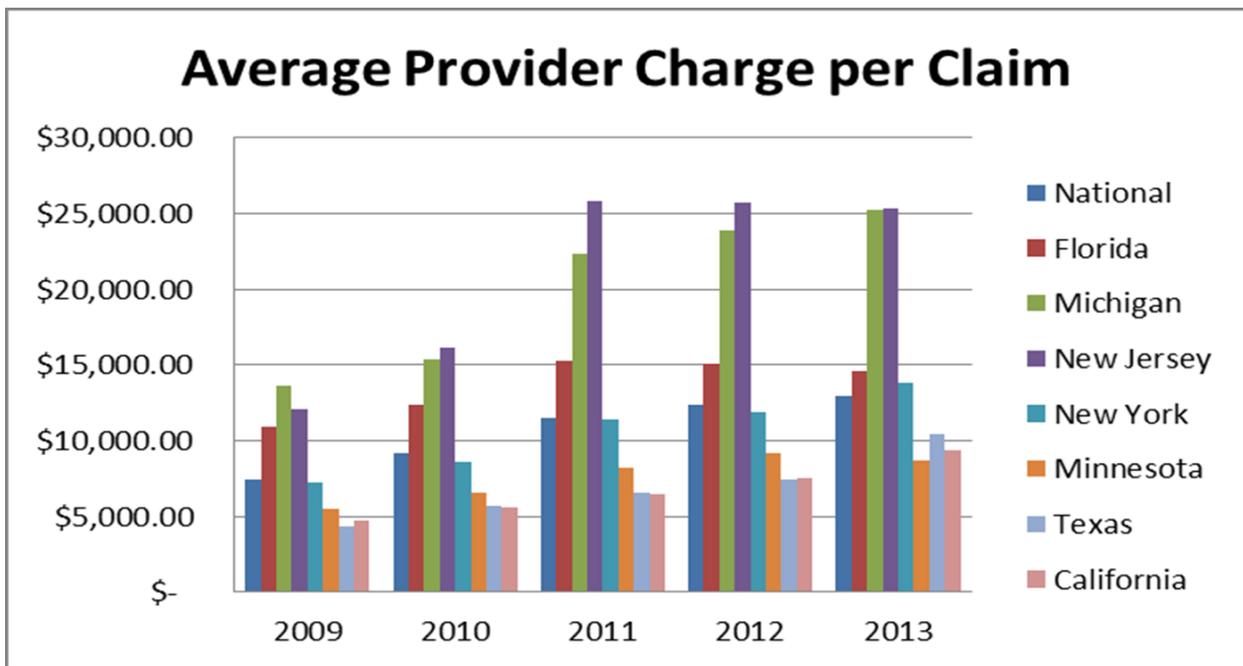




3. Mitchell International Inc. Data

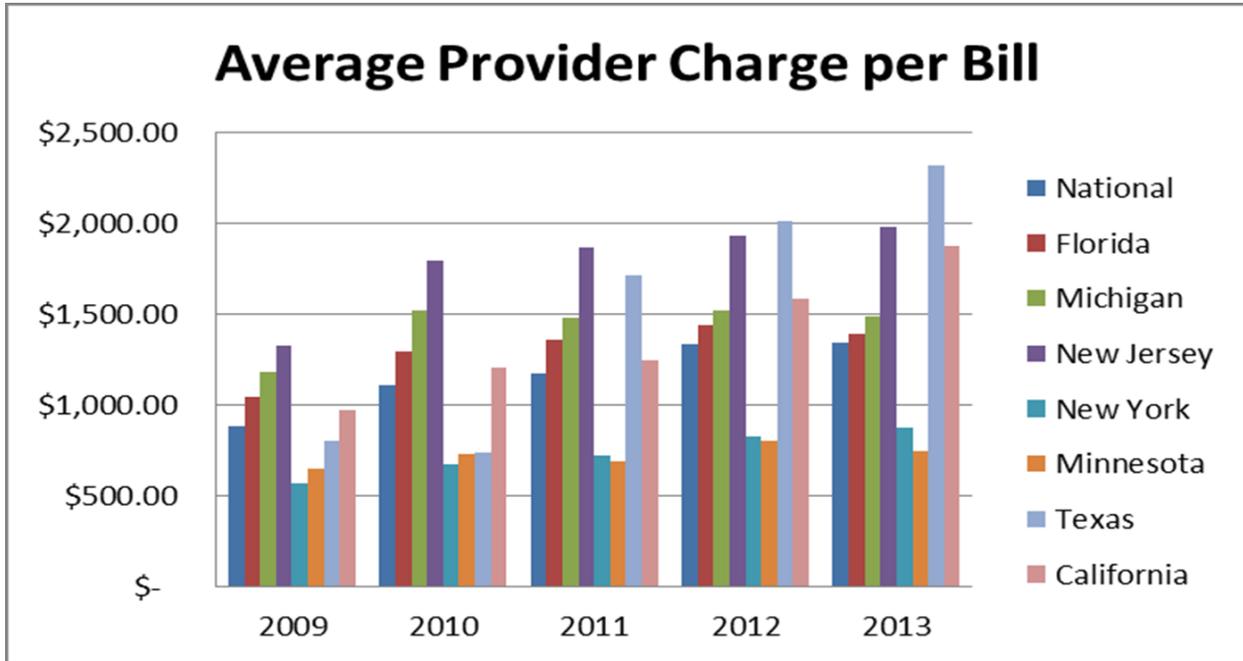
As a provider of Property & Casualty claims technology solutions, Mitchell International, Inc. (“Mitchell”) processes over 50 million transactions annually for over 300 insurers. Many of the industry leaders in the auto insurance market utilize Mitchell’s medical claims software, DecisionPoint. Mitchell supplied data to the Office which provided a high level review of trends to national averages and experience here in Florida.

The results show that Florida is above the national average in many instances, including provider charges per claim and the average number of procedures per claim. This was true in the previous personal injury protection data call report issued in 2011 and remains true even with the implementation of HB 119. However, the gap between the national average and Florida has decreased between 2012 and 2013 and can likely be attributed to the impact of HB 119.

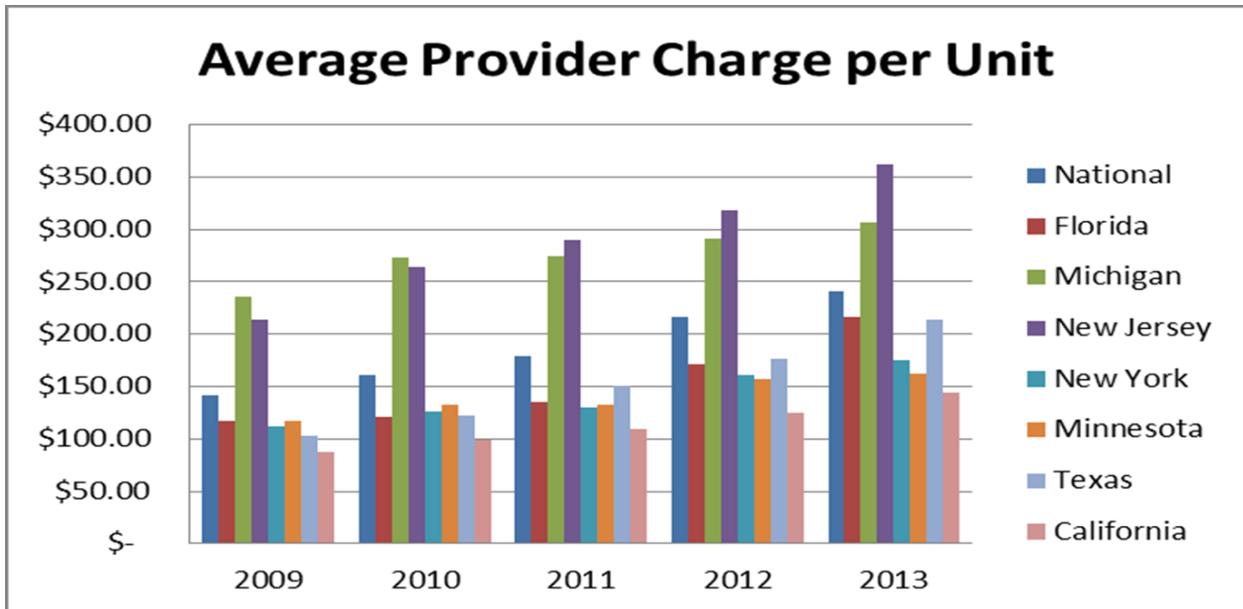


Source: Graph provided by Mitchell. Copyright 2014 by Mitchell International, Inc. Reprinted with permission.

Florida and New Jersey were the only states in the above graph that experienced a decrease in the average provider charge per claim between 2012 and 2013.

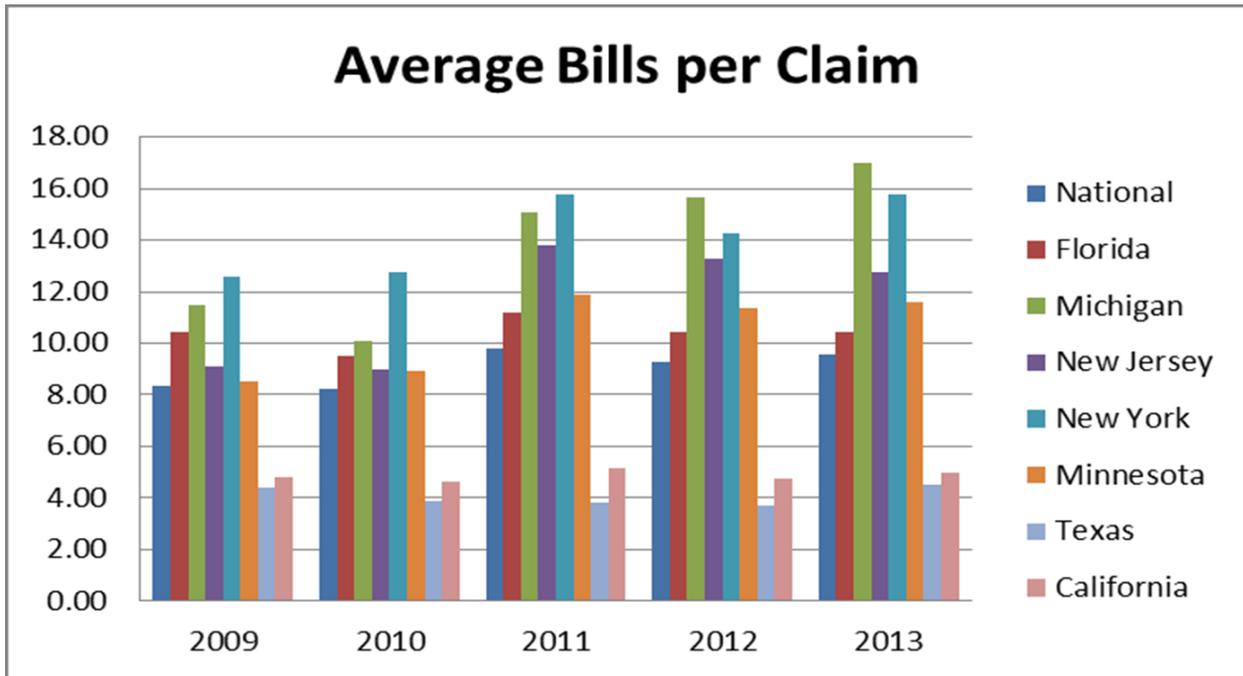


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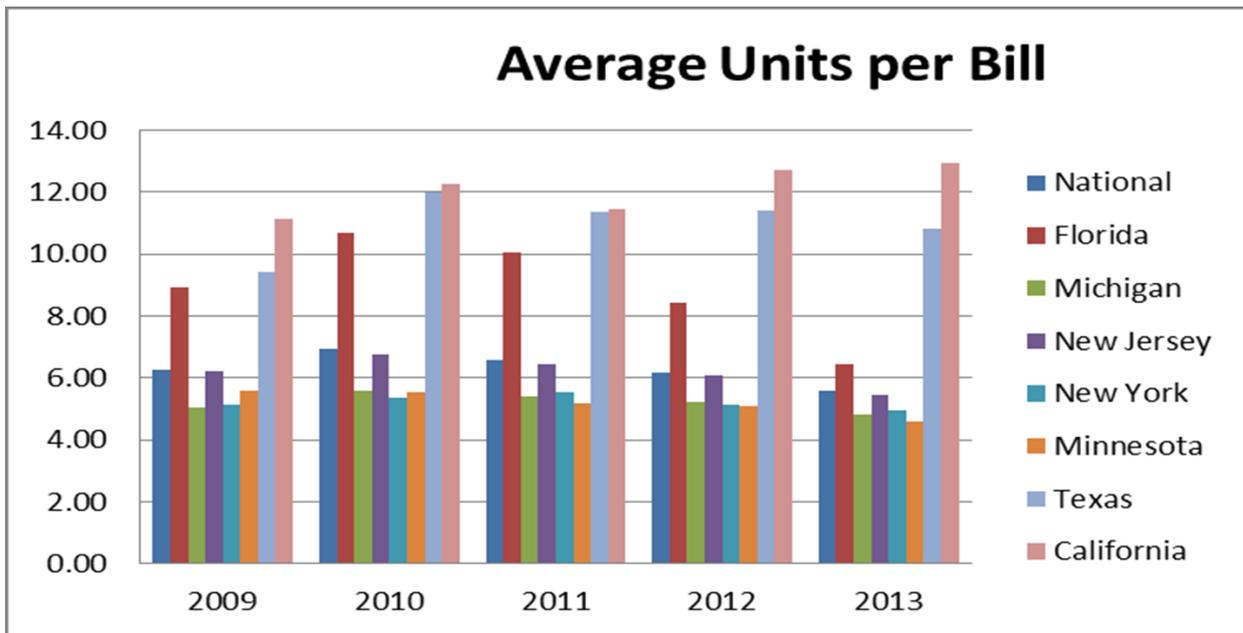


Source: Graph provided by Mitchell. Copyright 2014 by Mitchell International, Inc. Reprinted with permission.

While the average provider charge per claim in Florida decreased between 2012 and 2013, the average provider charge per unit (or procedure) actually increased during that period as it did for the other states shown and for the nation as a whole.



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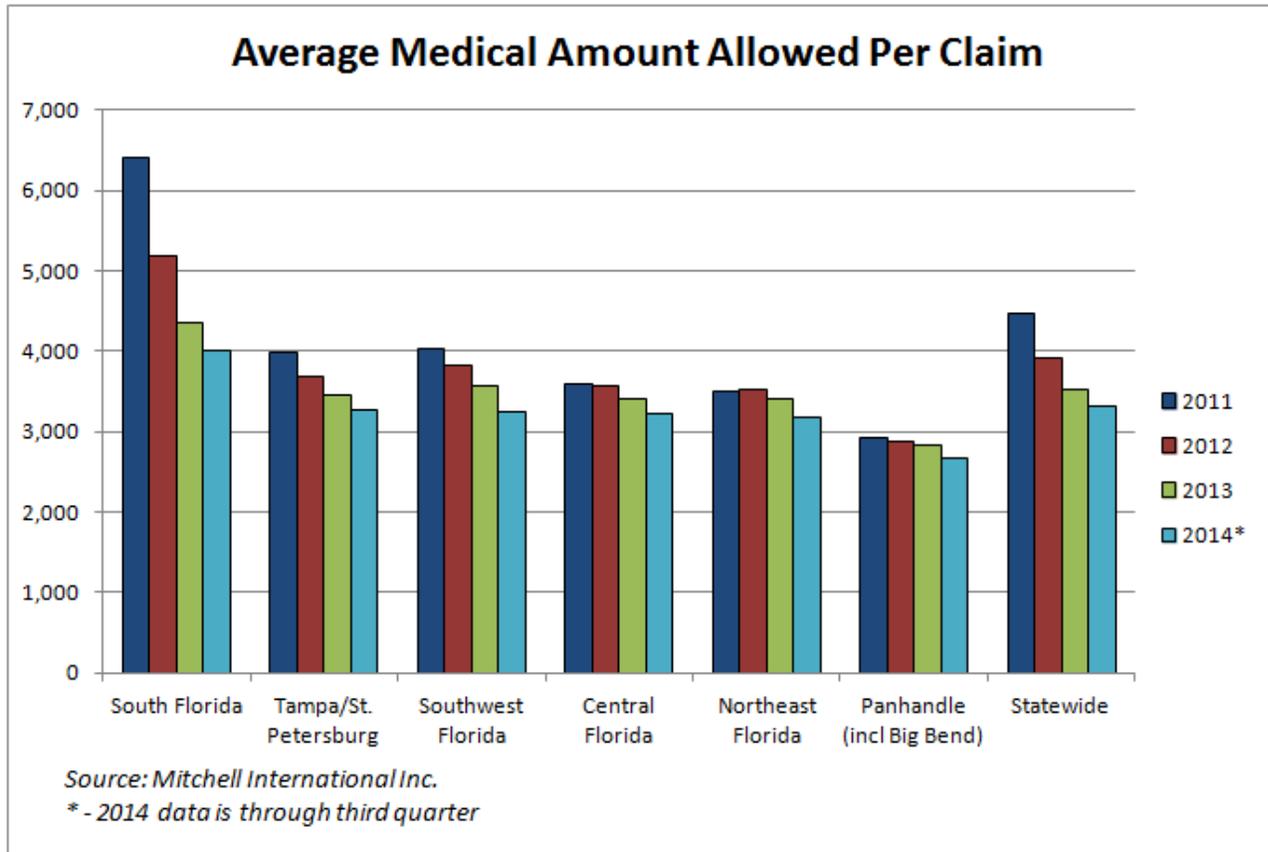
Source: Graph provided by Mitchell. Copyright 2014 by Mitchell International, Inc. Reprinted with permission.

Even though the charges per unit increased between 2012 and 2013 in Florida, the significant decrease in the number of units per bill and the stable number of bills per claim resulted in the decreases shown for the average provider charges per claim and per bill.

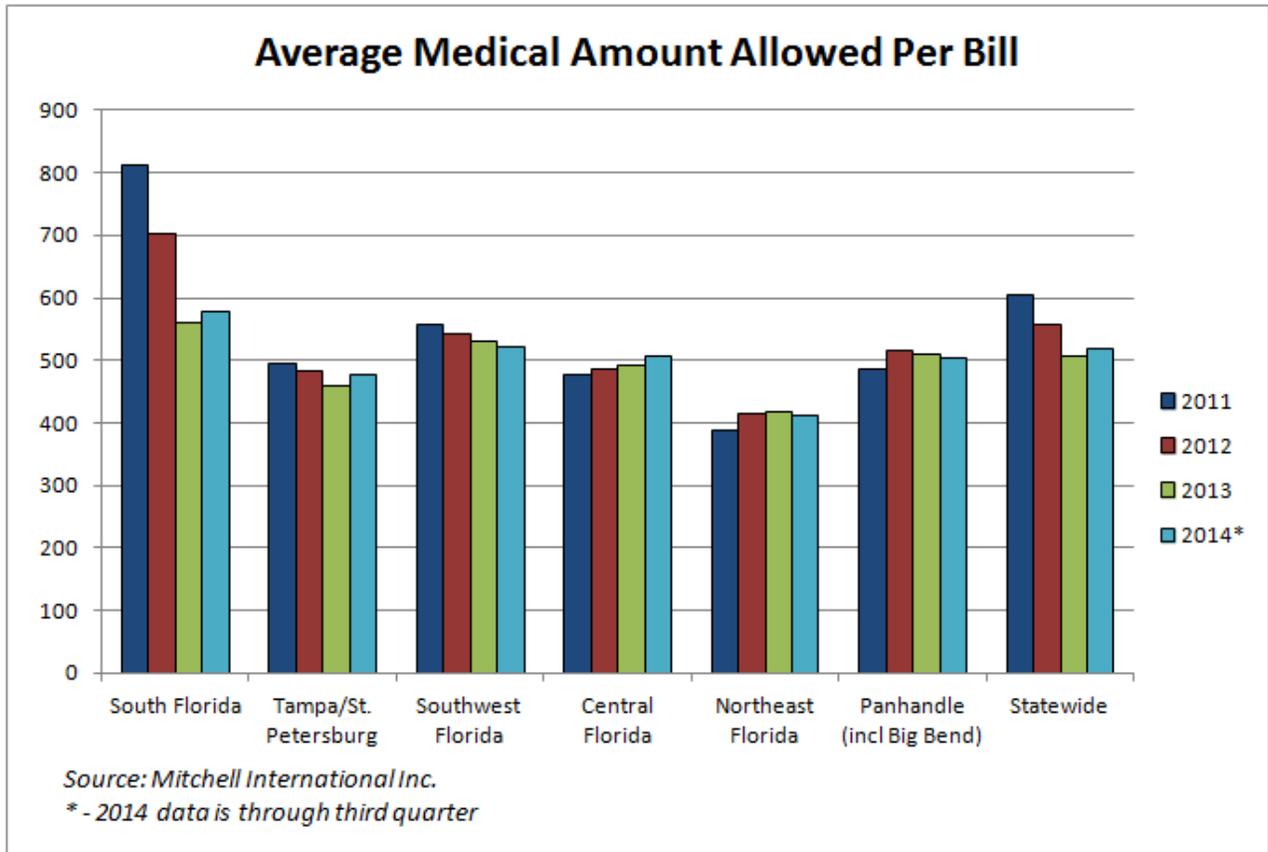
In addition to the graphs showing comparisons between Florida and national experience, Mitchell also provided data that allowed for regional comparisons of the above information. The data included the amounts that the provider billed versus what was ultimately allowed and paid by the insurer. The table below contains the county assignment for the regions that were selected to be included in the graphs in this section.

Region	Counties in Region
<i>South Florida</i>	<i>Palm Beach, Miami-Dade and Broward</i>
<i>Tampa/St. Petersburg</i>	<i>Hillsborough and Pinellas</i>
<i>Southwest Florida</i>	<i>Charlotte, Collier, Lee, Manatee and Sarasota</i>
<i>Central Florida</i>	<i>Brevard, Citrus, Hernando, Lake, Orange, Osceola, Pasco, Polk and Seminole</i>
<i>Northeast Florida</i>	<i>Clay, Duval and Saint Johns</i>
<i>Panhandle (incl Big Bend)</i>	<i>Bay, Calhoun, Escambia, Franklin, Gadsden, Gulf, Holmes, Jackson, Jefferson, Leon, Liberty, Madison, Okaloosa, Santa Rosa, Taylor, Wakulla, Walton and Washington</i>

While most regions have shown improvement over the examined period, the largest differences between the amounts paid per claim pre- and post-HB-119 are found in South Florida. For the average medical amounts allowed/paid per claim, the statewide average decrease from 2011 to the first three quarters of 2014 was 25.6%. During that same period, the average decrease for South Florida was 37.6%.



For the average medical amounts allowed/paid per bill, the statewide average decrease from 2011 to the first three quarters of 2014 was 14.0%. During that same period, the average decrease for South Florida was 28.7%. During this same period of time, there were regions that experienced increases in the average medical amounts paid per bill.



III. Data from Additional Sources

1. Annual Statement Data

In addition to data provided through the data call and from Mitchell, data from other sources was also examined. The first source of data examined was the annual statements submitted by each insurer licensed to write personal auto insurance in Florida. The annual statement shows information for personal auto broken out into three component types:

- PIP
- Liability (Other than PIP)
- Physical Damage

As with the data call, it is necessary to examine liability coverage types other than PIP in order to determine the impact of HB 119 on personal auto insurance.

The annual statement data that is shown in this section is based on calendar year data, which is different from the accident year data collected in the data call. Calendar year information reflects activity that occurred during that calendar year, regardless of when the accident occurred or the policy was issued. For example, if an accident occurred in 2011 and a loss payment was made in 2013, the loss payment is recorded under incurred losses in Calendar Year 2013.

In addition, calendar year information captures changes in reserve estimates that occur during that year. For example, assume that an accident occurred in 2012, an initial reserve estimate of \$10,000 was set in 2013 and then the reserve estimate was revised to \$12,000 in 2014:

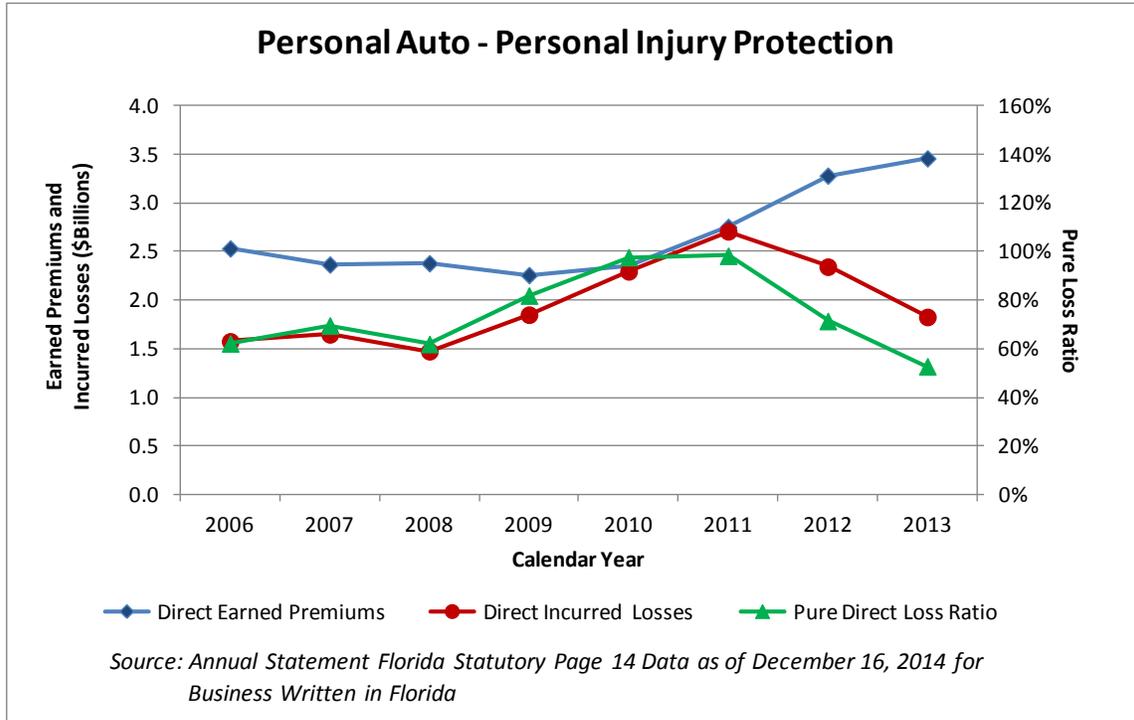
- The initial reserve estimate of \$10,000 is recorded as an incurred loss in 2013, and
- The additional \$2,000 would be recorded as an incurred loss in 2014.

Personal Injury Protection

There have been significant changes in Florida earned premiums and incurred losses over the last 8 years for Personal Injury Protection coverage:

- Direct earned premiums remain relatively stable between 2006 and 2010, which resulted in a total decrease in premiums of 7.2%.
- Since 2010 there have been significant increases in earned premiums, resulting in a total increase of 47.2% between 2010 and 2013.
- Overall, between 2006 and 2013, premiums have increased 36.6%.
- Incurred losses were relatively stable between 2006 and 2008 but then experienced significant double-digit increases each year from 2008 to 2011 and significant double-digit decreases each year since 2011.
 - Between 2006 and 2008, incurred losses decreased by 6.4%.
 - Between 2008 and 2011, incurred losses increased by 83.7%. This would average to an increase of almost 22.5% each year.

- Since 2011, incurred losses have decreased by 32.5%. This would average to a decrease of almost 17.9% each year.
- Between 2006 and 2013, losses have increased 15.9%.

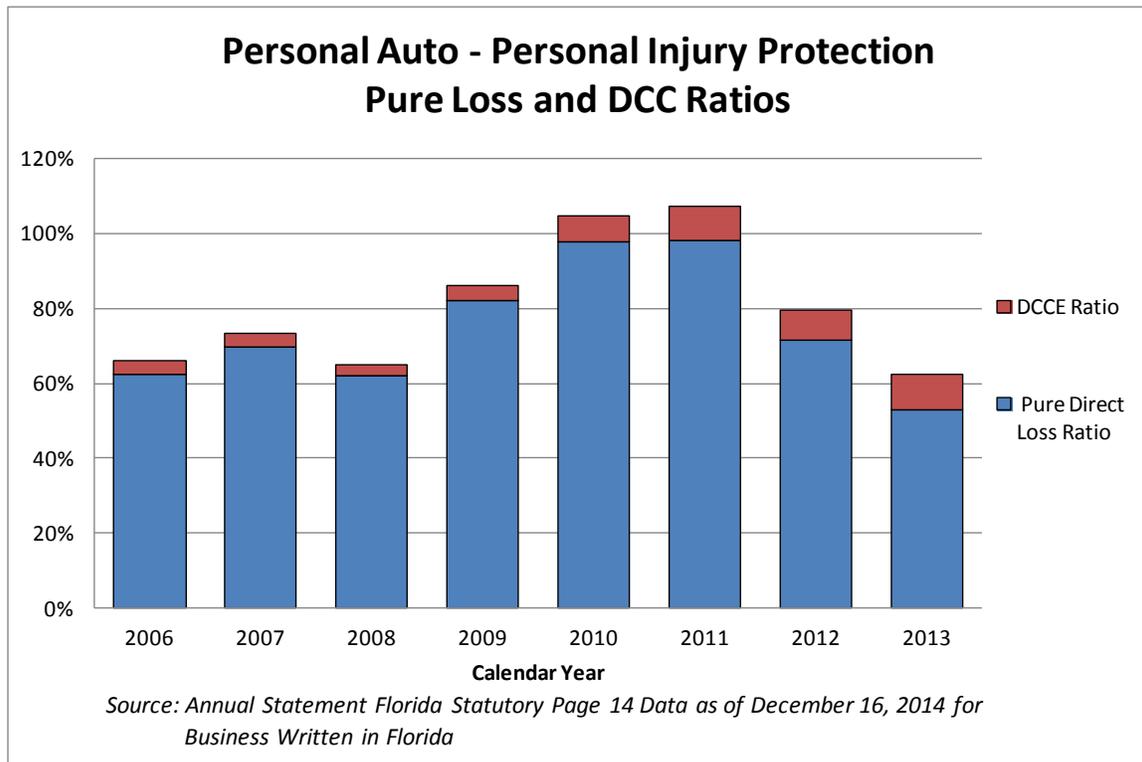


The pure loss ratio (measured as Direct Incurred Losses divided by Direct Earned Premiums) increased 58% from 2006 to 2011, when the loss ratio reached its pinnacle of 98.3% during the review period. This means that for every dollar of premium that the insurer collected; over ninety-eight cents went to pay for losses. Since 2011, the loss ratio has declined significantly to 52.8% in 2013.

In addition to losses, an insurer must pay for various expenses that occur from issuing the policy and the handling/adjustment of claims. One such expense is Defense and Cost Containment (DCC), which includes, but is not limited to:

- Fees or salaries for appraisers, private investigators, hearing representatives, and fraud investigators (if working in defense of a claim), and
- Attorney fees incurred owing to a duty to defend the insured.

On the next page is a chart showing the combined Loss and DCC ratios for 2006-2013 for Personal Injury Protection. In two of the years shown on the graph, after including the cost of DCC expenses that the insurer paid, the loss and DCC ratio was over 100%. For example, the loss and DCC ratio for 2011 was 107.4%. This means that for every dollar of premium that the insurer collected; over \$1.07 was paid out purely in losses and DCC expenses.



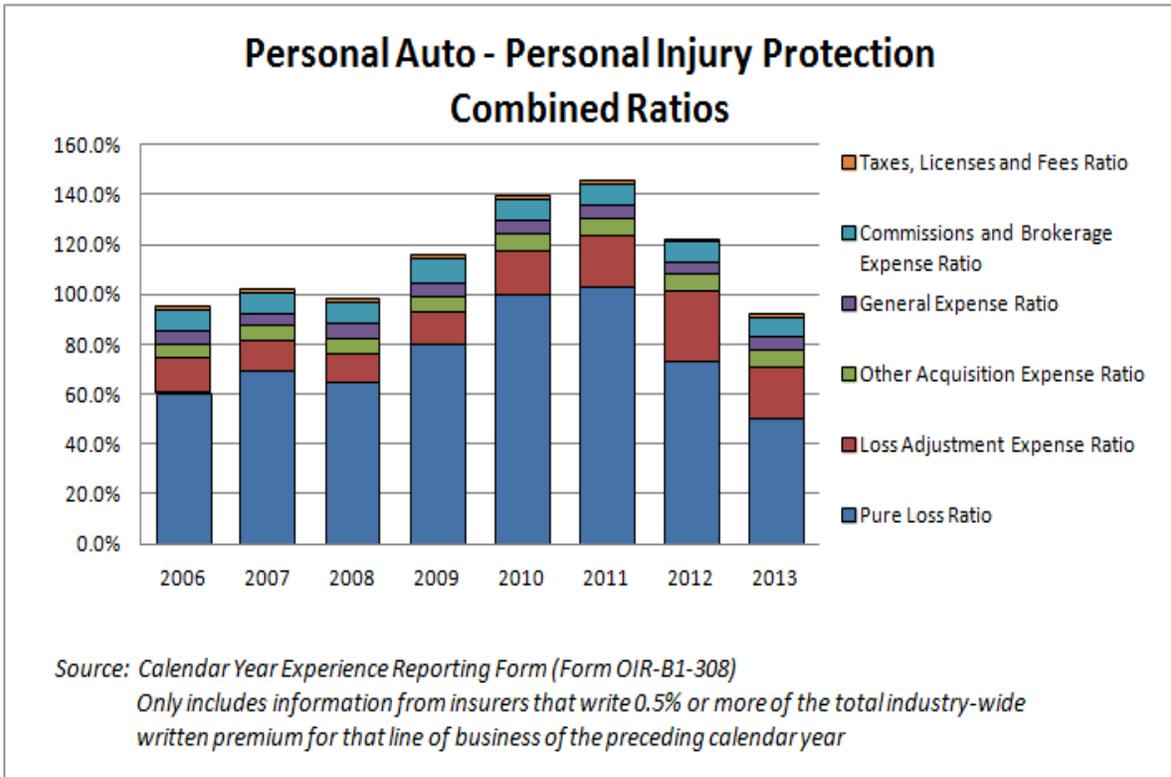
In addition to losses and DCC, insurers incur other expenses, such as:

- Adjusting and Other (A&O) Expenses which includes, but is not limited to, fees of adjusters and settling agents, attorney fees incurred in the determination of coverage, including litigation between the insurer and the policyholder, and fees or salaries for appraisers, private investigators, hearing representatives, and fraud investigators, if working in the capacity of an adjuster,
- Commission and Brokerage Expenses,
- Other Acquisition Expenses,
- General Expenses, and
- Taxes, Licenses and Fees

One measure of the profitability of an insurer is the combined ratio. This ratio is determined by summing the loss ratio and all of the various expense ratios. A combined ratio below 100 percent is indicative of an underwriting profit for the insurer.

On the next page is a breakdown, by component, of the combined ratios for 2006 through 2012 for PIP coverage. This data was determined using information submitted by insurers in the Calendar Year Experience Reporting Form (Form OIR-B1-308) that insurers submit annually on April 1st. It represents data from all insurers that write 0.5% or more of the total Florida written premium for that line of business of the preceding calendar year. After all losses and expenses were paid, 2006, 2008 and 2013 were the only years in the period shown where the combined

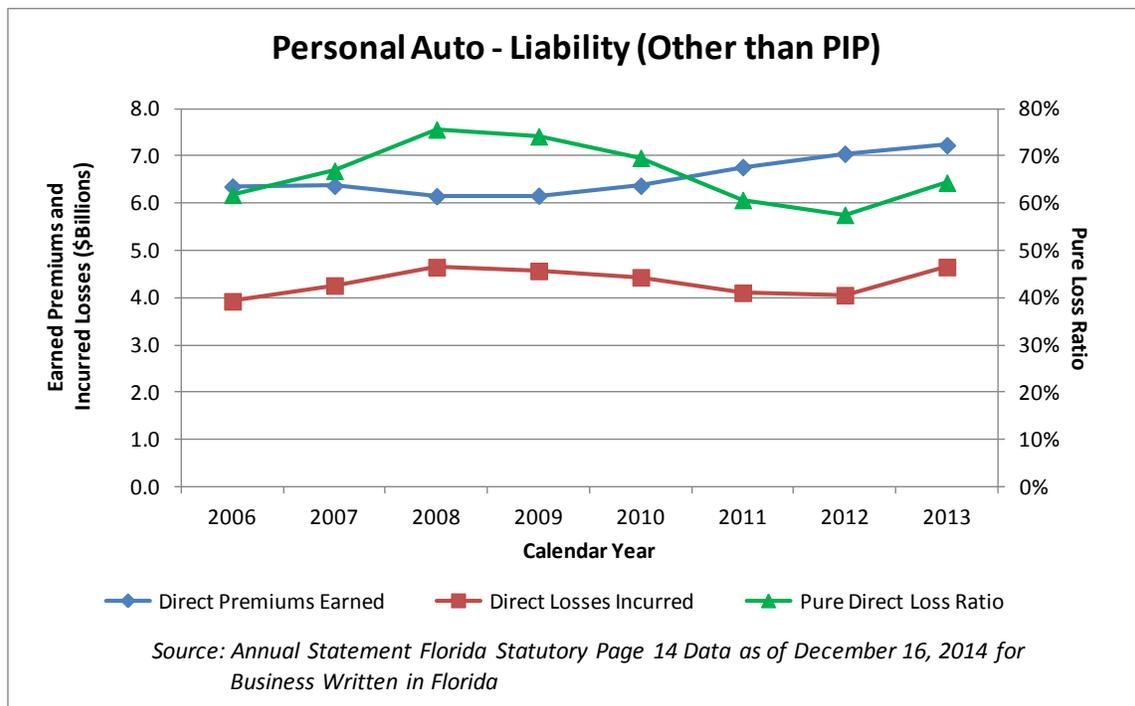
ratio was less than 100%. It should be noted that the combined ratios do not include provisions for policyholder dividends or investment gain/loss.



Liability Other Than PIP (Bodily Injury, Property Damage, Uninsured Motorists and Medical Payments Coverages)

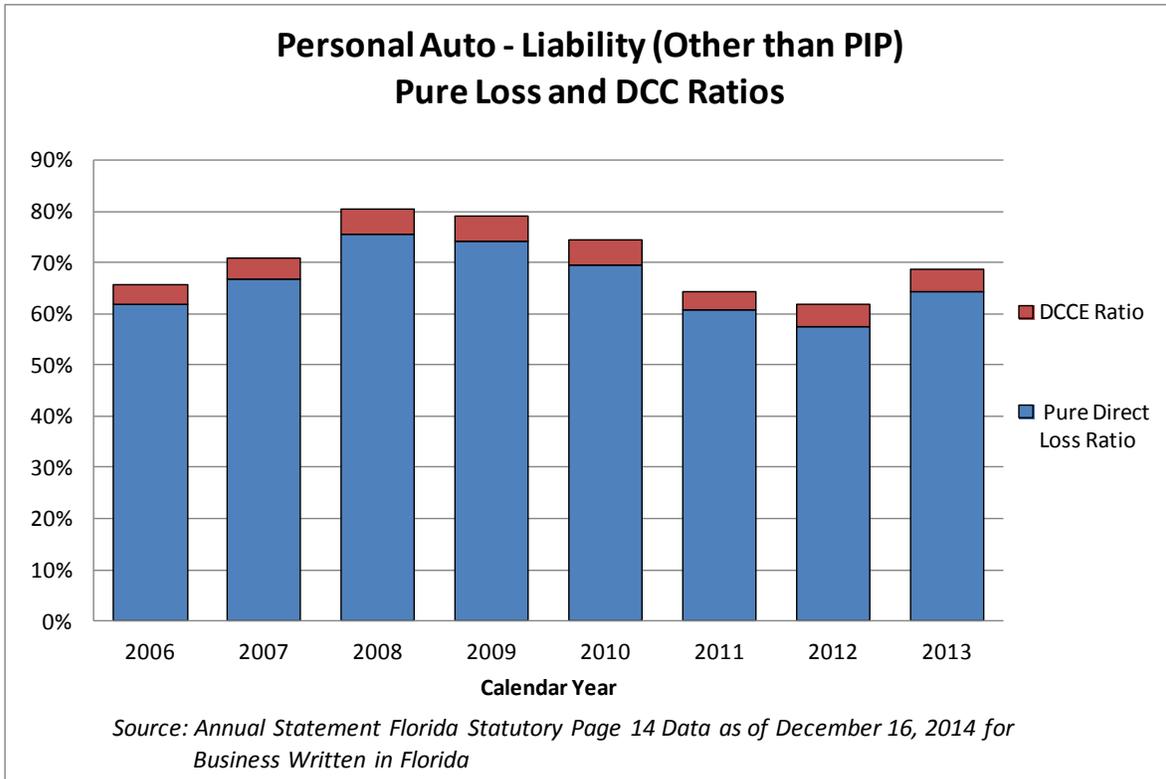
In general, the Florida earned premiums and incurred losses have been relatively stable over the last 8 years for liability coverages other than PIP:

- Between 2006 and 2013, direct earned premiums increased by 13.8%. This represents an average 1.9% increase each year.
- Between 2006 and 2008, incurred losses increased an average 9% a year, but then there were four years of small decreases, resulting in relatively stable incurred losses between 2006 to 2012. However, anecdotally, several insurers have indicated that the trends for some liability coverages are starting to deteriorate rapidly. This can be seen in the graph by the 14.7% increase in incurred losses that occurred between 2012 and 2013. Based on many recent filings submitted to the Office, it is expected that the 2014 numbers will also show a significant increase.

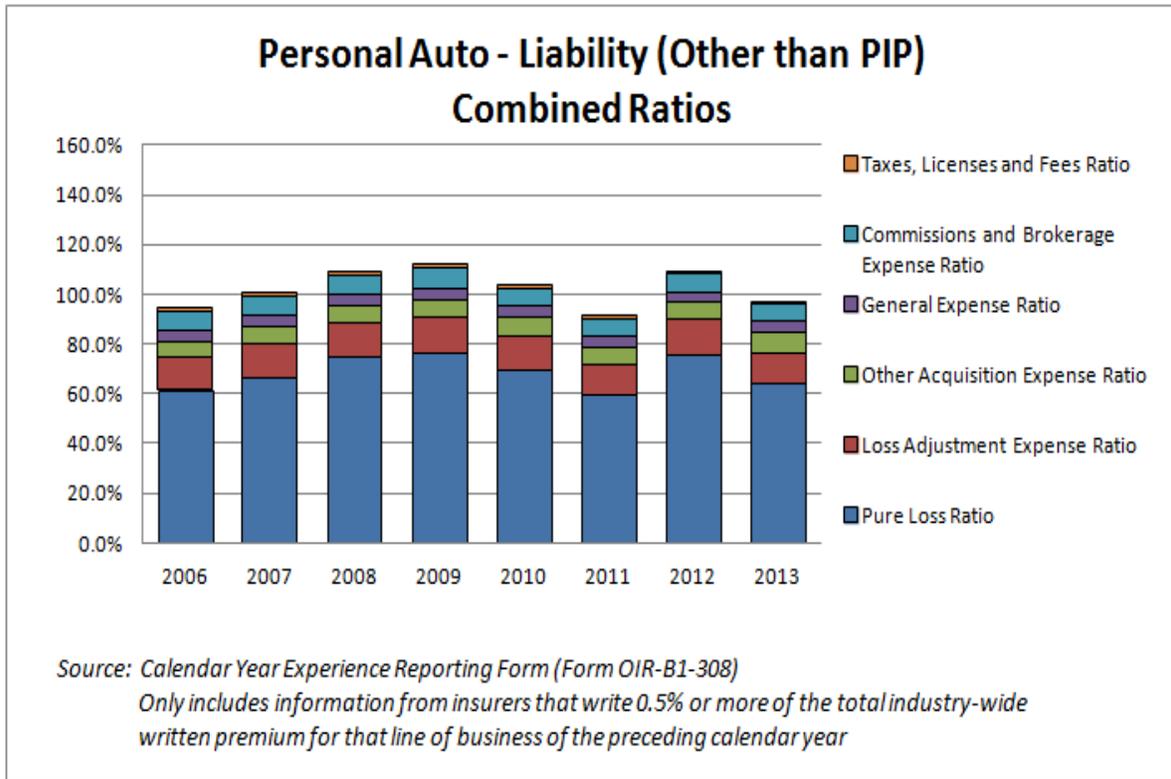


Overall, between 2006 and 2013, the pure loss ratio only increased 4.1%; however there were significant swings during that time, with a high of 75.6% in 2008 and a low of 57.6% in 2012. In 2013, the pure loss ratio was 64.3%, which means that over 64 cents out of every dollar received in premium went to pay losses experienced under the policy.

The chart below shows the combined Loss and DCC ratios for 2006-2013 for Liability Coverage (Other than PIP). Unlike PIP, there are no years where the combined loss & DCC ratio exceeded 100%. The highest ratio was 80.4% in 2008.



On the next page is a breakdown, by component, of the combined ratios for 2006 through 2012 for liability coverages (other than PIP). This data was also determined using information submitted by insurers in the Calendar Year Experience Reporting Form (Form OIR-B1-308). Even with the lower loss and DCC ratios – when compared with PIP – 2006, 2011 and 2013 were the only years in the period shown where the combined ratio was less than 100%. It should again be noted that the combined ratios do not include provisions for policyholder dividends or investment gain/loss.



2. Fast Track Monitoring System Data

Another useful tool is data from the Fast Track Monitoring System (“Fast Track”) that contains information collected by the following statistical agencies:

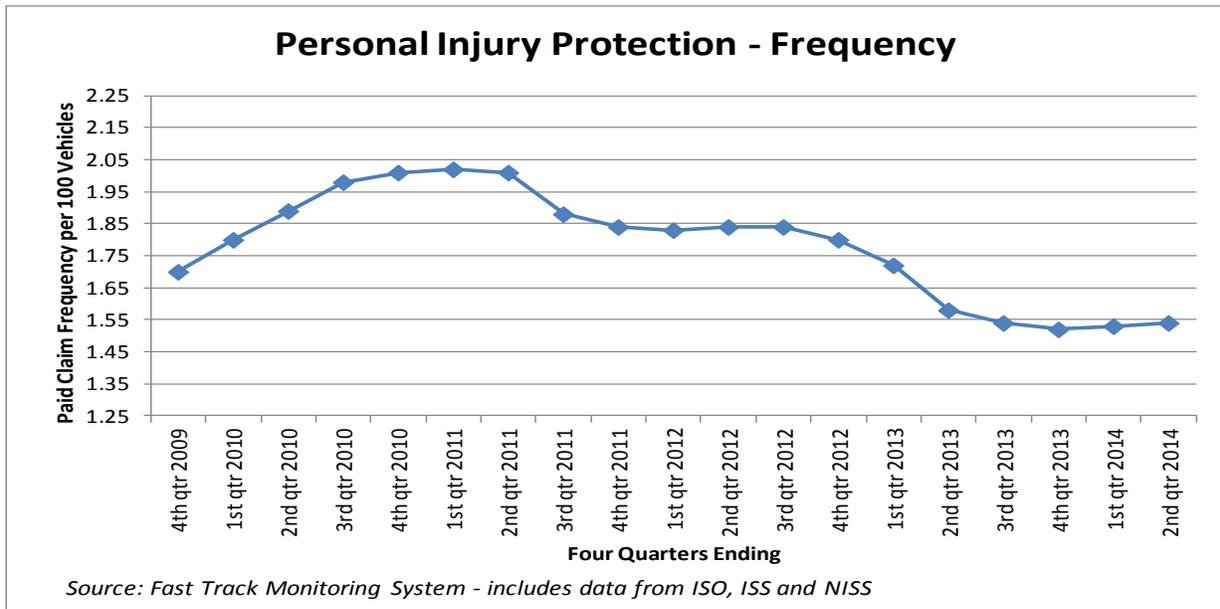
- Independent Statistical Service, Inc. (ISS),
- Insurance Services Office, Inc.(ISO), and
- National Independent Statistical Service (NISS)

Fifty of the largest insurers, representing approximately 70% of the nationwide personal auto premium, contribute data for this voluntary report. The data, which is reported quarterly, is an indicator of how claim and loss patterns are changing over time. To avoid the effects of seasonality, the data is generally reviewed by looking at the most recent four quarters of information at each quarter. In the graphs below, the data is broken into three indicators:

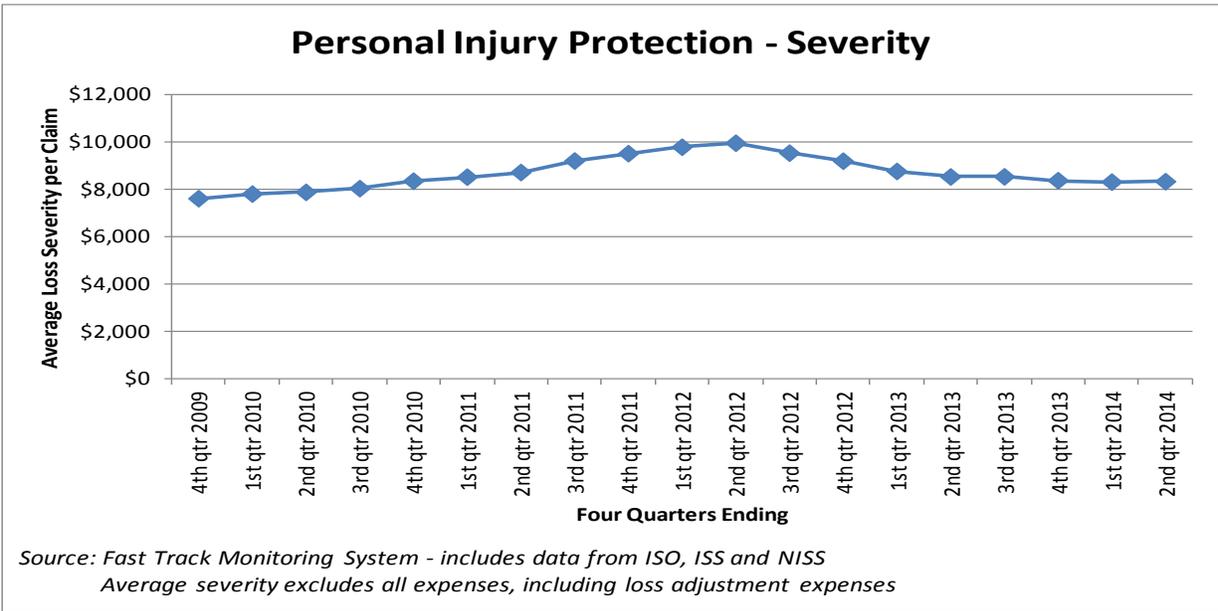
- Frequency – The number of paid claims per 100 vehicles (paid claims are ones in which an amount has been paid, but does not necessarily represent a closed claim)
- Severity – The average cost per claim (only includes losses covered by PIP – all expenses are excluded)
- Pure Premiums – The average dollars of loss per exposure – in this case earned car year.

Personal Injury Protection

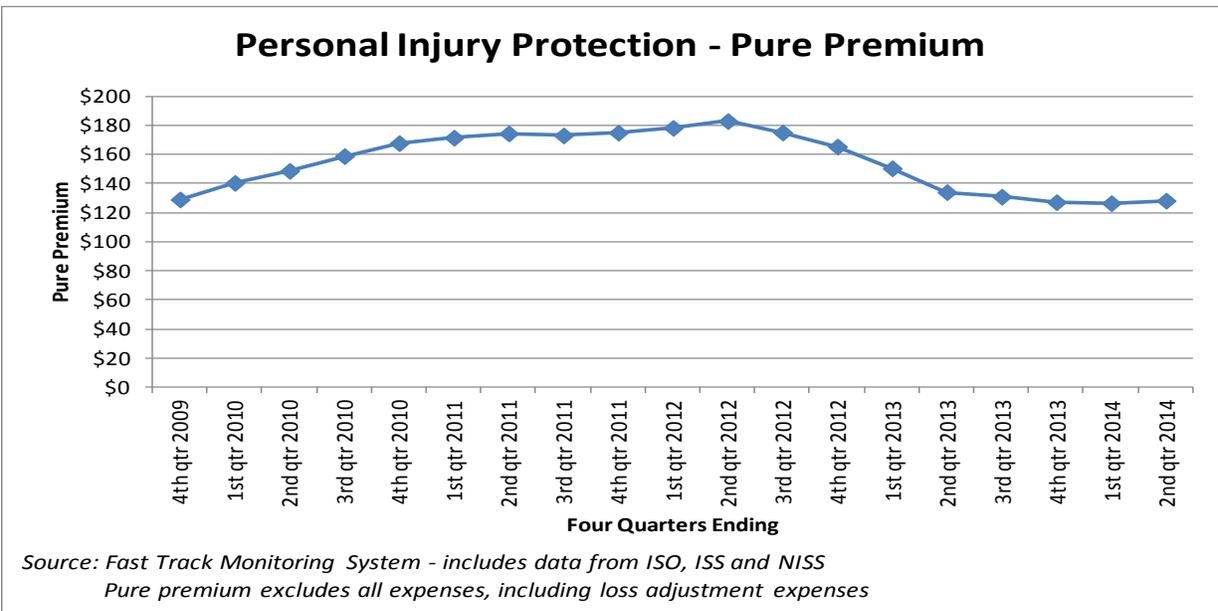
The frequency of PIP claims in Florida steadily increased from from 4th quarter 2009 to 2nd quarter 2011 and then decreased from 2nd quarter 2011 to 3rd quarter 2013. Since that time, the frequency has remained relatively stable. Based on this data, it is expected that the frequency of paid claims will remain stable in the next year.



The severity of PIP claims in Florida steadily increased from from 4th quarter 2009 to 2nd quarter 2012 and then decreased from 2nd quarter 2012 to 4th quarter 2013. Since that time, the severity has remained relatively stable. Based on this data, it is expected that the severity of paid claims will slightly increase in the next year.

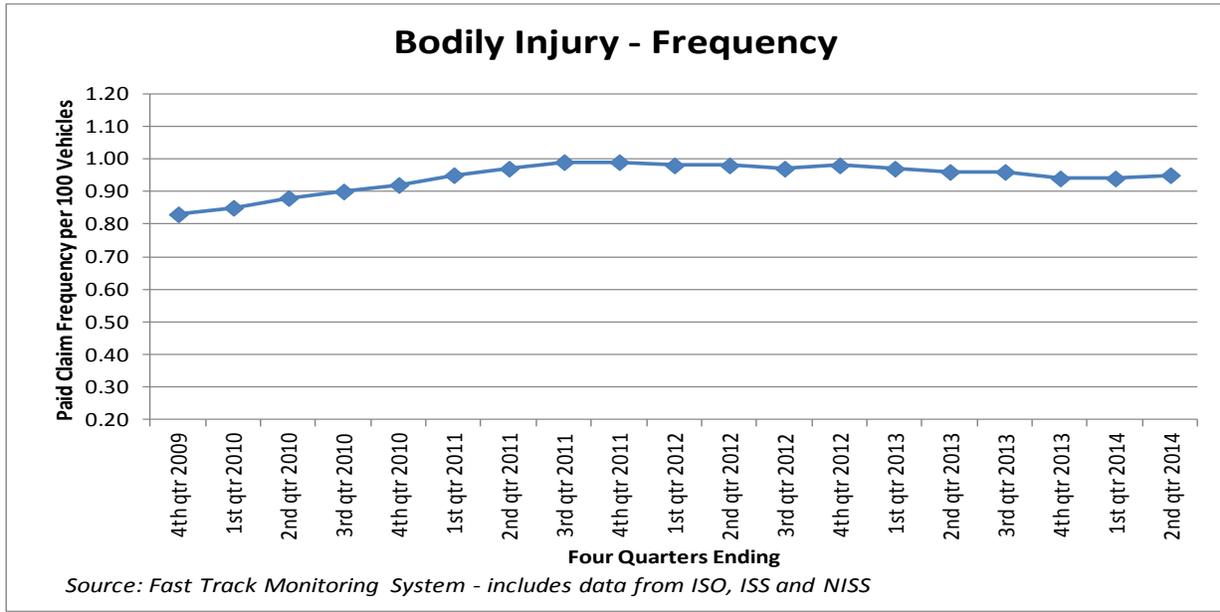


The increases in both the frequency and severity during the first portion of the review period resulted in steady increases in the pure premiums until the pure premium reached its peak of \$182.99 at 2nd quarter 2012. Since that time, the decreases in frequency and severity have resulted in declining pure premiums until it stabilized around 4th quarter 2013. Due to the relatively stable frequency and severity trends, it is expected that the pure premiums will also remain stable over the next year. There may be a slight increase given that the latest point for both frequency and severity have increased slightly.

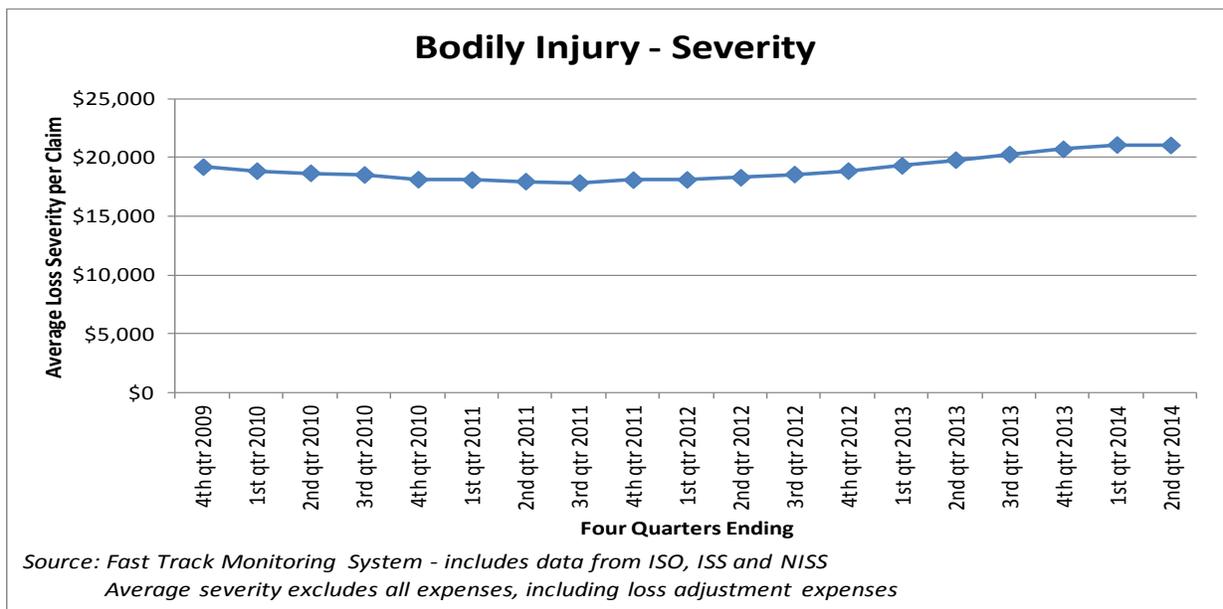


Bodily Injury

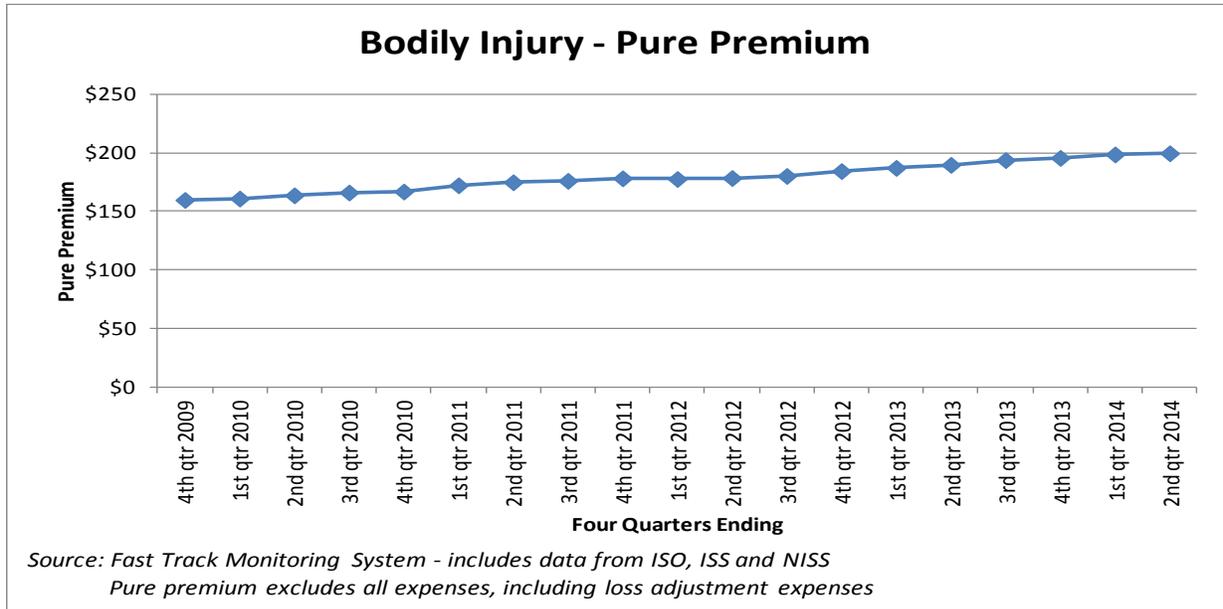
The frequency of Bodily Injury claims in Florida has steadily increased from from 4th quarter 2009 to 3rd quarter 2011 and has declined somewhat since that time. Based on this data, it is expected that the frequency of paid claims may slightly decrease in the next year.



The severity of Bodily Injury claims in Florida has shown slight decreases in 2010 and early 2011 but has increased significantly since 3rd quarter 2011. Based on this data, it is expected that the severity of paid claims will experience approximately an 8% increase in the next year.

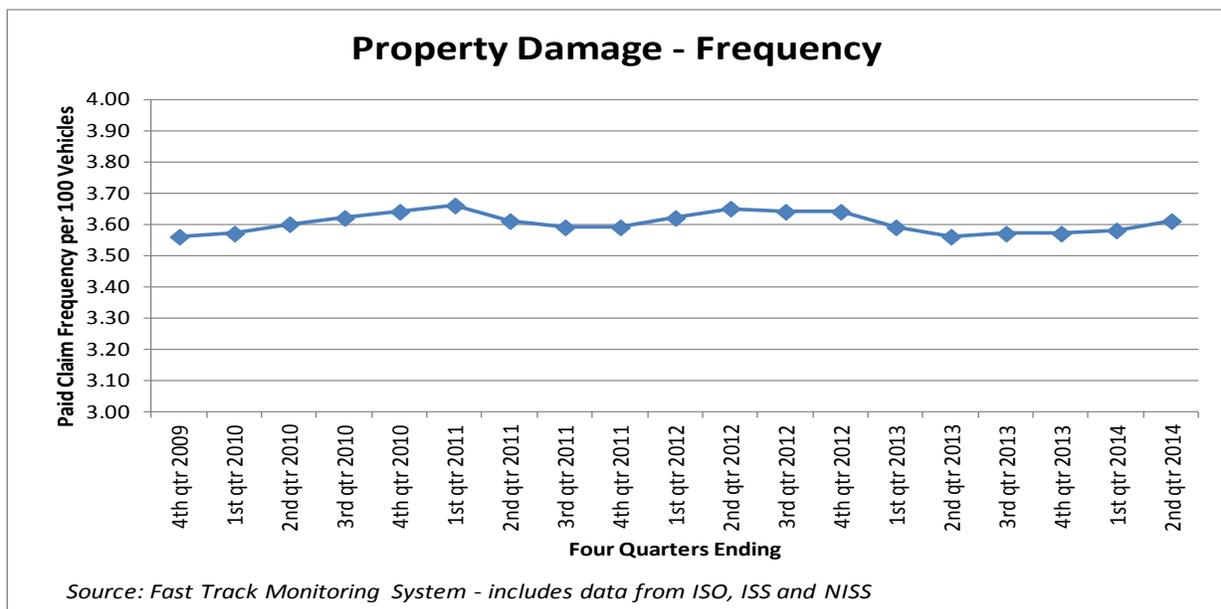


Pure premiums have steadily increased during the review period. Due to the relatively stable frequency and higher severity trends, it is expected that the pure premiums will increase at least 6% over the next year.

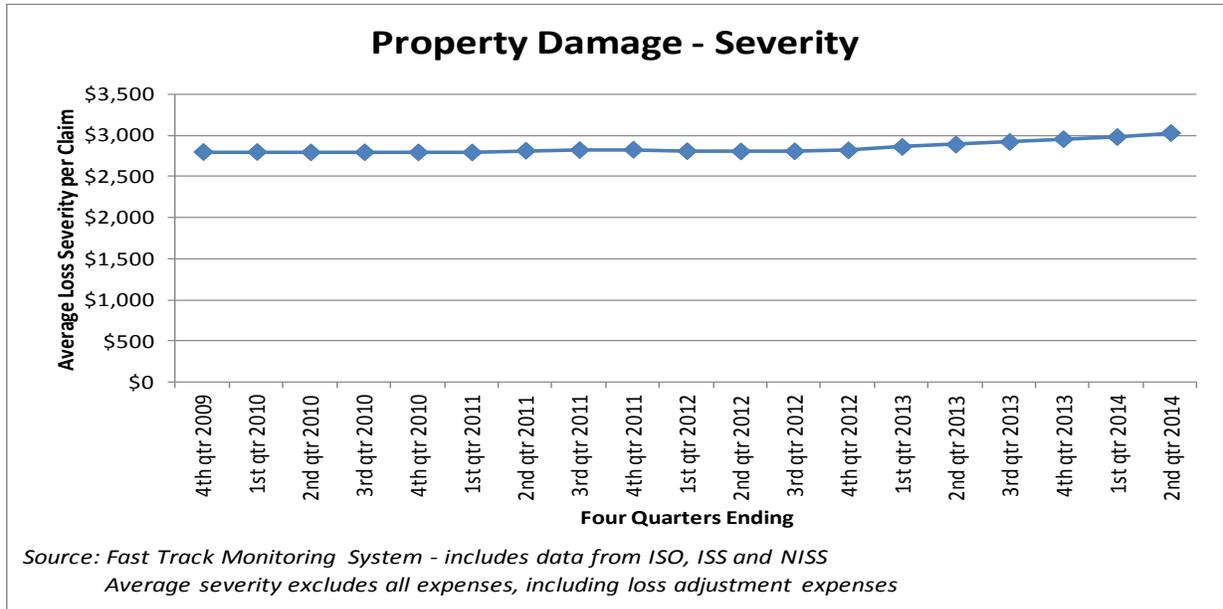


Property Damage

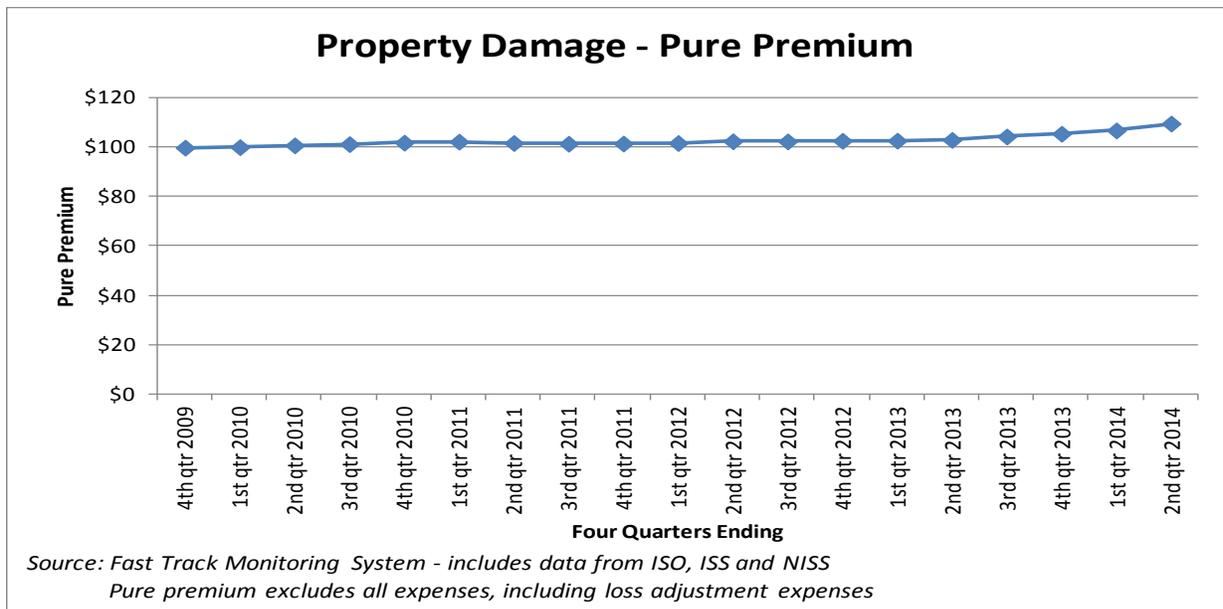
The frequency of Property Damage claims in Florida has remained somewhat stable during the review period. The more recent history shows a slight decrease since a high of 3.65 paid claims per 100 cars in 2nd quarter 2012. Based on this data, it is expected that the frequency of paid claims may slightly decrease in the next year.



The severity of Property Damage claims in Florida has shown slight increases since 2nd quarter 2012. It is expected that the severity of paid claims will experience a slight increase in the next year.



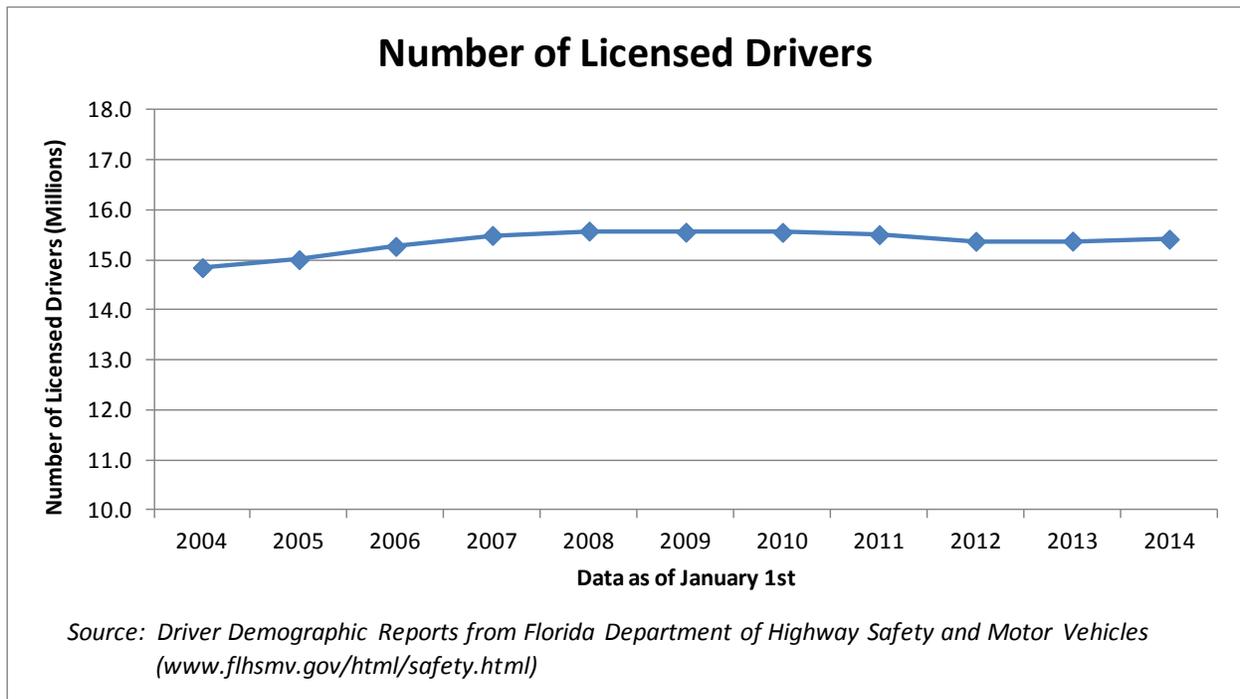
Pure premiums have increased during the review period, from a pure premium of \$99.68 at 4th quarter 2009 to a pure premium of \$109.41 at 2nd quarter 2014. It is expected that the pure premiums will continue to increase at approximately 3-4% over the next year.



3. Licensed Drivers and Number of Accidents

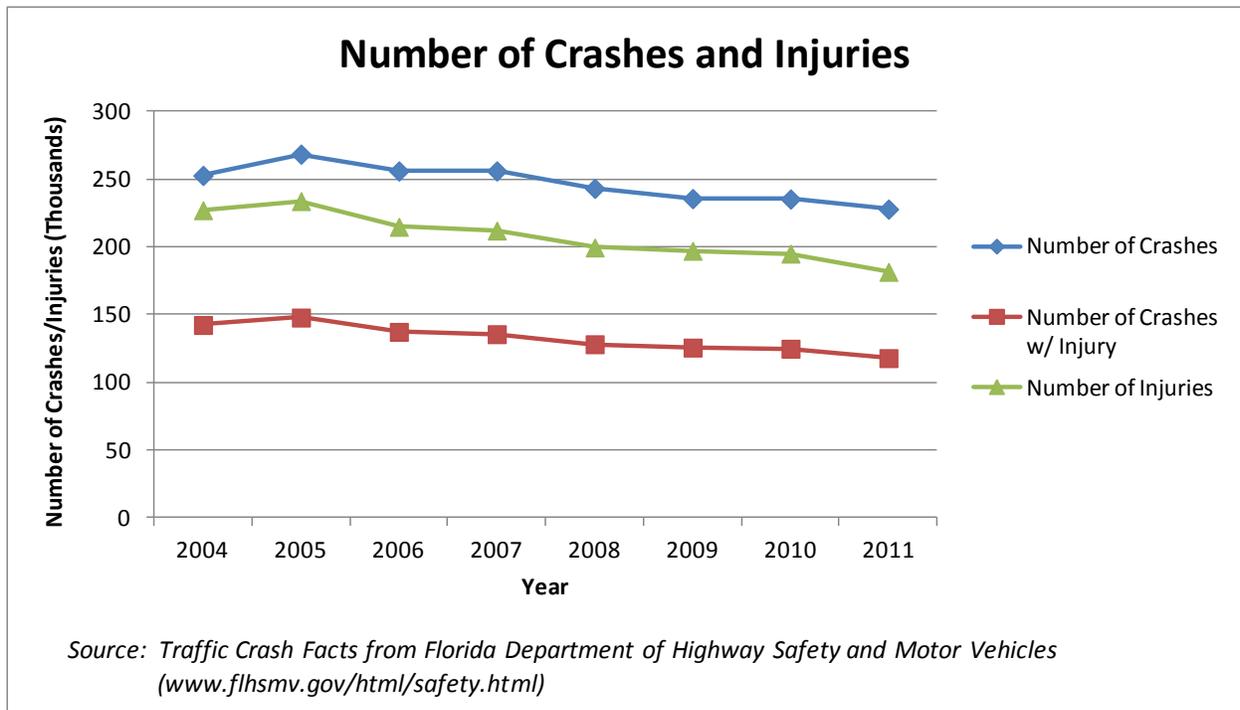
One explanation for a change in frequency of claims could be an increase or decrease in the number of drivers or accidents.

Based on data from the Florida Department of Highway Safety and Motor Vehicles, it does not appear that there has been an appreciable change in the number of licensed drivers. Since 2004, the number of licensed drivers has increased by 3.8%. This represents an average change of 0.4% each year.



Prior to HB 119, Section 316.066, Florida Statutes, required a “Long Form” crash report to be completed by a law enforcement officer for any crash that results in a death or personal injury, involves an intoxicated or "hit and run" driver, or when a vehicle was rendered inoperative and required a wrecker to remove it from traffic.

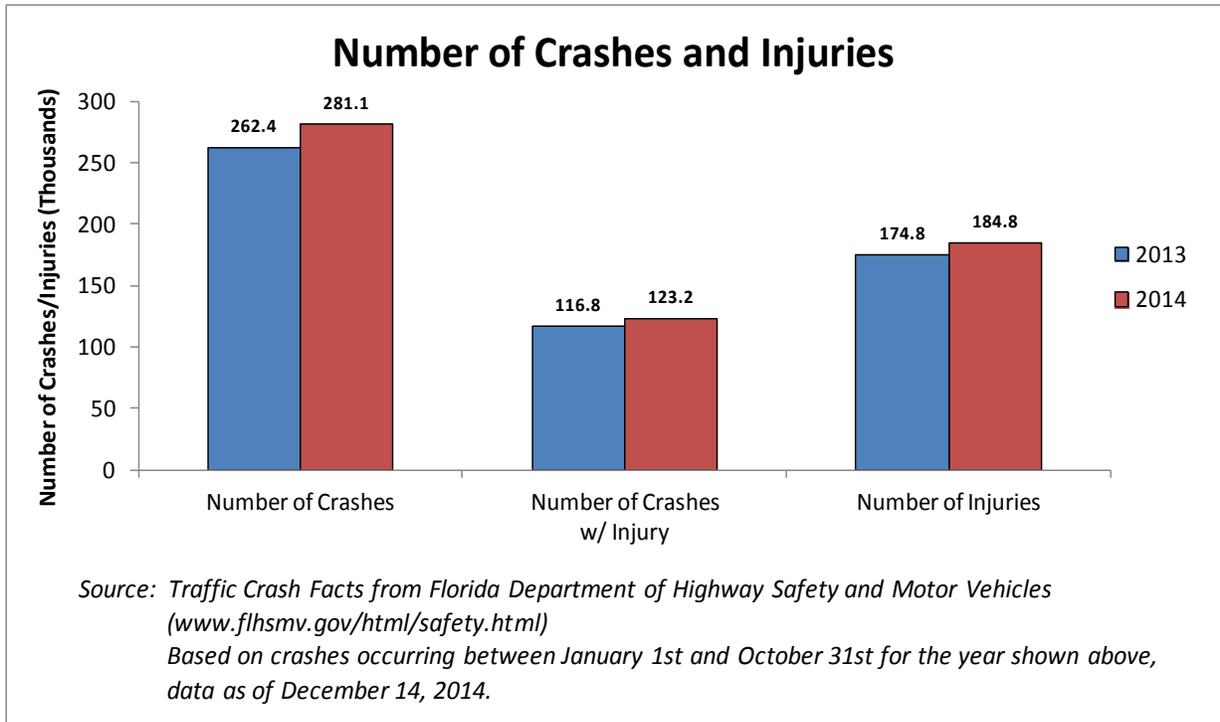
The number of crashes reported on a “Long Form” crash report (including crashes with injuries) decreased between 2004 and 2011. During that time, the number of crashes decreased 9.8%, while the number of crashes with injuries decreased 17.2%.



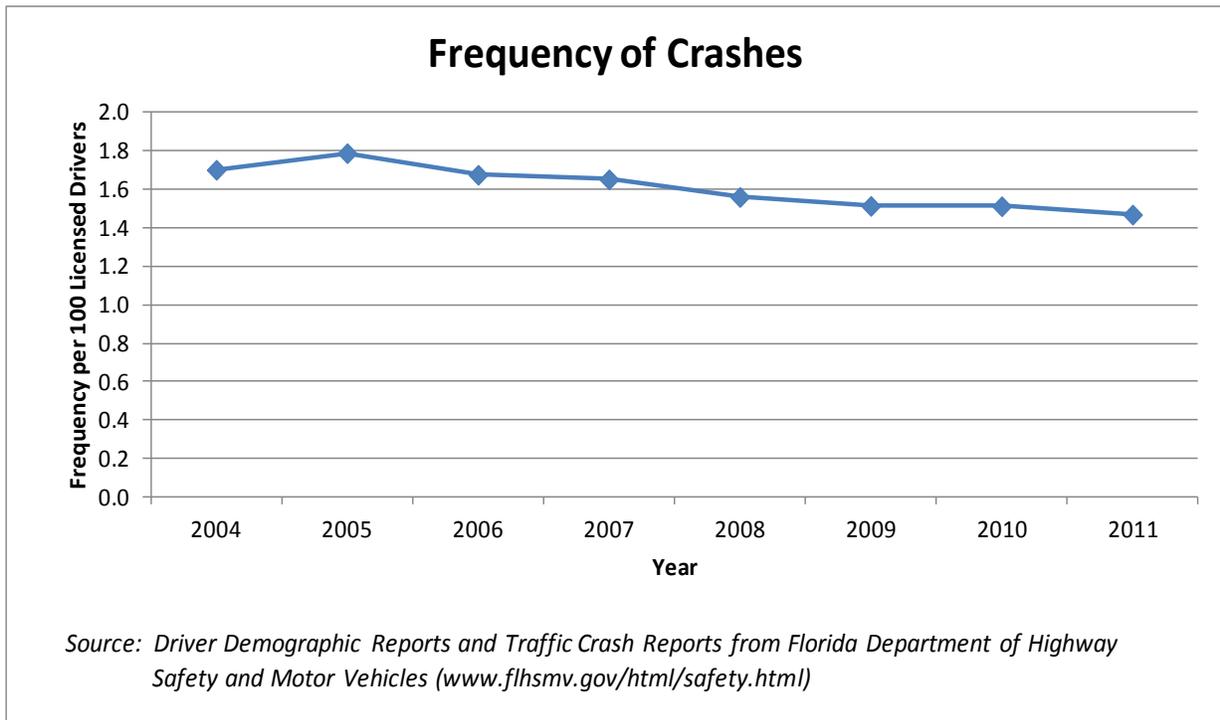
Pursuant to HB 119 and effective July 1, 2012, Section 316.066, Florida Statutes, was amended to require additional crashes to be reported to the Department of Highway Safety and Motor Vehicles which the law enforcement agencies were not previously required to submit. The changes included the following additional circumstances under which the crash must be reported:

- Any complaint of pain or discomfort experienced by any persons involved
- All commercial motor vehicle crashes without regard to any other statutory requirement
- A vehicle was rendered inoperable to a degree that required a wrecker to remove it from the scene of the crash

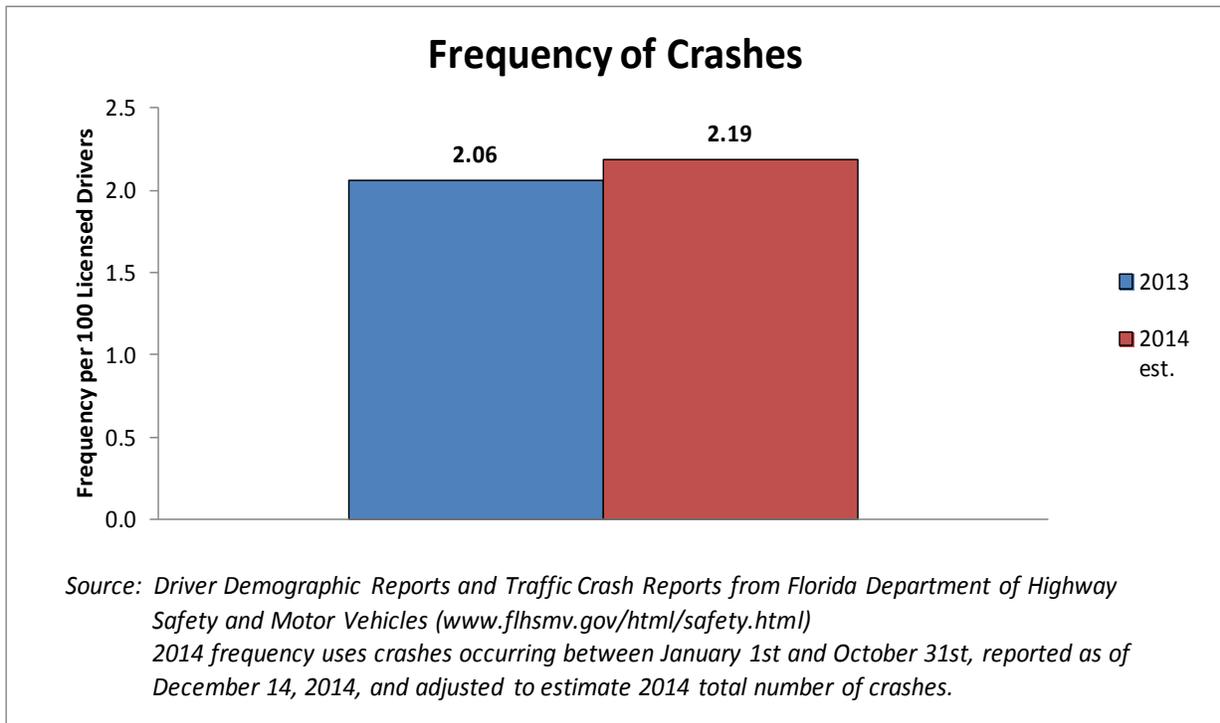
Due to the additional claims that were being reported, you cannot compare the number of crashes being reported prior to the enactment of HB 119 with those crashes reported after the enactment of HB 119. Since 2012 was a transition year, the number of crashes reported should not be used in any comparisons. The Department of Highway Safety and Motor Vehicles has a website where crash statistics can be obtained almost as soon as the crash report is submitted to them. It does appear that there may be a little delay between the date of the crash and when the report is submitted. As such, we compared the number of crashes submitted in the first ten months of 2013 with the number of crashes reported in the first ten months of 2014. As shown in the chart on the next page, more crashes and more crashes with injuries were reported in 2014 than in 2013.



While it is informative to look at the actual number of crashes, the better statistic to use is the frequency of the accidents. This would explain any increases or decreases in crashes that occur solely due to a change in the number of licensed drivers. The frequency of crashes per 100 licensed drivers has decreased 13.7% from 2004 to 2011.



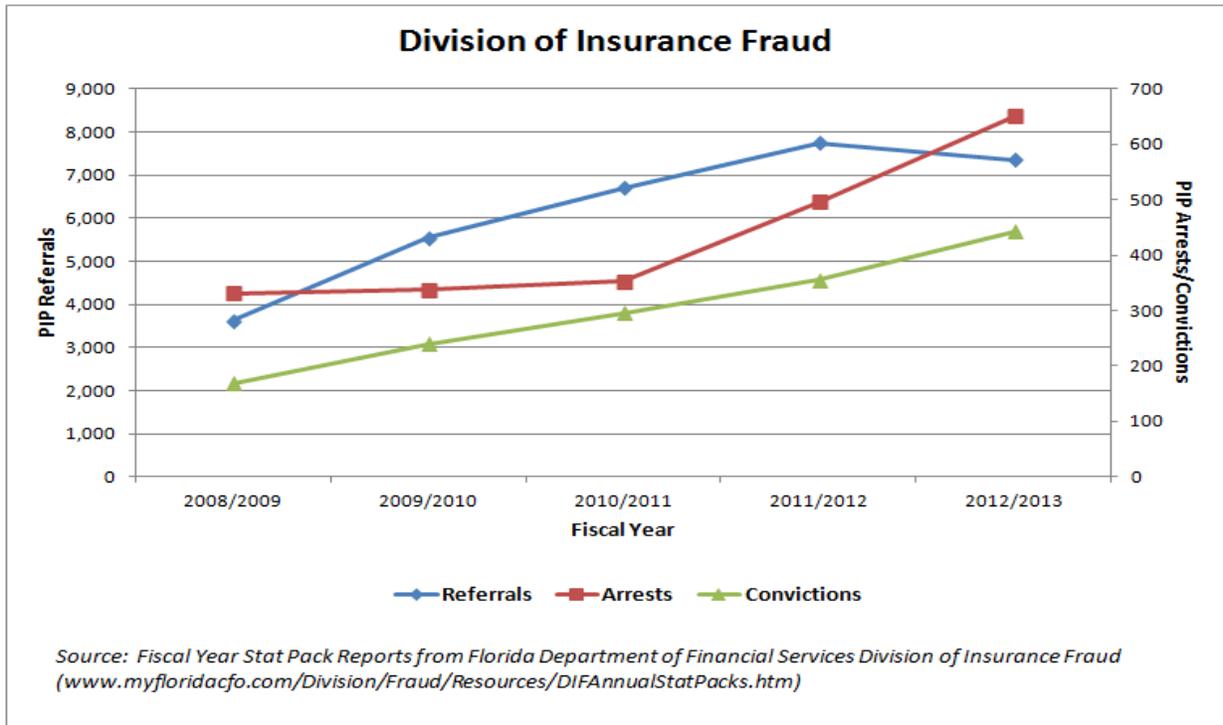
A comparison was also made of the frequency of crashes for 2013 and 2014. An adjustment was made to the first ten months of crash statistics in 2014 to estimate the full year's number of crashes. It is estimated that the frequency of crashes will increase by slightly more than 6% in 2014.



The data from Department of Highway Safety and Motor Vehicles would suggest that the frequency of liability and personal injury protection claims should have decreased between 2004 and 2011 and that the more recent data should show increases in frequency.

4. Fraud

The Division of Fraud (DIF), within the Department of Financial Services, is responsible for investigating insurance fraud, including personal injury protection fraud. Based on information presented on their website, DIF has experienced a sharp increase in the number of fraud cases reported to them.



PERSONAL INJURY PROTECTION FRAUD						
TYPE OF CASE	COMPLAINTS	CASES OPENED	CASES CLOSED	PRESENTED FOR PROSECUTION	ARREST	CONVICTIONS
BY ATTORNEY	66	4	5	3	2	2
BY CLAIMANT	2,336	148	110	109	89	63
BY PROVIDER	2,906	143	138	167	120	73
FICTITIOUS CLAIM OR DAMAGE	1	0	0	0	0	0
FICTITIOUS INSURANCE CARD	308	132	101	75	74	53
ILLEGAL POSSESSION OF ACCIDENT REPORT	3	0	0	0	0	1
JUMP IN	201	64	48	44	34	23
LOST WAGES	18	6	4	4	3	4
PAPER ACCIDENT	50	11	10	33	25	20
PATIENT BROKERING	31	14	16	30	19	11
SOLICITATION	229	41	40	18	10	5
STAGED ACCIDENT	979	165	155	303	266	178
UNLICENSED ACTIVITY	218	15	8	16	9	9
TOTAL	7,346	743	635	802	651	442

Source: Florida Department of Financial Services, Division of Insurance Fraud, FY 2012/13 Stat Pack (page 22) www.myfloridacfo.com/Division/Fraud/Resources/documents/StatPack_FY_2012_2013.pdf

VEHICLE FRAUD						
TYPE OF CASE	COMPLAINTS	CASES		PRESENTED FOR		
		OPENED	CLOSED	PROSECUTION	ARREST	CONVICTIONS
ACCESSORIES	94	22	13	7	7	2
BODY SHOP	148	16	12	4	3	3
BY CLAIMANT	6	1	0	0	0	0
BY PROVIDER	1	0	0	0	0	0
DAMAGE TO VEHICLE	636	68	59	29	29	19
DITCHING	493	49	61	18	18	19
FAILURE TO RETURN (THEFT)	11	2	2	0	0	1
JUMP IN	1	0	0	0	0	0
VEHICLE	0	1	0	0	0	0
TOTAL	1,390	159	147	58	57	44

Source: Florida Department of Financial Services, Division of Insurance Fraud, FY 2012/13 Stat Pack (page 23) www.myfloridacfo.com/Division/Fraud/Resources/documents/StatPack_FY_2012_2013.pdf

Since July 2010, DIF has taken significant steps to reduce insurance fraud in Florida, such as arresting:

- Over 1,100 people for staged accidents, including 319 staged accident organizers and recruiters.
- Over 90 clinic owners, 15 doctors and 37 chiropractors.
- More than 200 clinic employees, half of whom held a license issued by the Department of Health.
- 142 people related to what is called jump-ins (persons who were not actually involved in the accident, but later claimed to be and filed false claims).
- Nearly 100 patients for their involvement in fraudulent claims not related to staged accidents.
- 62 people in solicitation / patient brokering cases.
- More than 200 people in schemes involving fake insurance cards.

There has been a significant decline in PIP fraud since the implementation of HB 119. DIF has projected that there is up to a 16% decrease during Fiscal Year 2013-14 from Fiscal Year 2011-12. The success of the efforts in reducing fraud can be seen in the following case highlights from the article “PIP Fraud Spotlight – PIP Victories” in the June 2014 issue of PIP Source (published by DIF):

- **Operation Sledgehammer** – A federal / state coordinated effort in Palm Beach County - resulted in more than 100 arrests in a massive scheme involving staged accidents and PIP clinics associated with fraudulent billing in excess of \$18 million. The task force was comprised of the Division of Insurance Fraud, the Federal Bureau of Investigation, the Internal Revenue Service, the United States Attorney’s Office and the Palm Beach County State Attorney’s Office.

- **Jacksonville** – Investigation resulted in more than 100 arrests since 2012 from several staged accident rings. One of the arrests involved someone who was also indicted by the federal government for providing material support to terrorists.
- **Miami** – Investigation resulted in an arrest of a man who hijacked the Florida corporate identity of a diagnostic center that had closed in 2009. He used that false identity to bill more than \$725,000 for diagnostic tests that were never performed. In a similar investigation, a second individual was arrested for almost \$900,000 in fraudulent billings for services that never occurred.
- **Orlando** – Three people were arrested for stealing sensitive information from over 12,000 patients from a hospital. This information was then used to solicit patients to go to several clinics in Orlando.
- **Tampa** – Three clinic owners, in separate cases, were arrested for money laundering that involved more than \$1.5 Million in clinic proceeds.
- **Unlicensed clinics** – Several clinic owners have been arrested for operating unlicensed clinics, avoiding AHCA licensing requirements and oversight. In many instances, Department of Health licensees were used as straw owners of the clinics. These clinics filed millions of dollars in illegal billings. One arrest involved a man that was a fugitive from a prior Medicaid fraud conviction. While a fugitive, he opened and operated an unlicensed PIP clinic under a false identity.
- **Chiropractic fraud** – Thirty-five (35) chiropractors have been arrested for insurance fraud statewide since 2010. Many were involved in dozens of different fraudulent clinics over the last 10-20 years and were also involved as straw owners of clinics, concealing the true control of the clinic by criminals. Operation Sledgehammer (first bullet above) resulted in the arrest of six (6) chiropractors, who had a combined experience of more than 110 years in Florida. Another joint federal/state investigation resulted in the arrest of two (2) chiropractors who were licensed in Florida for a combined 47 years.

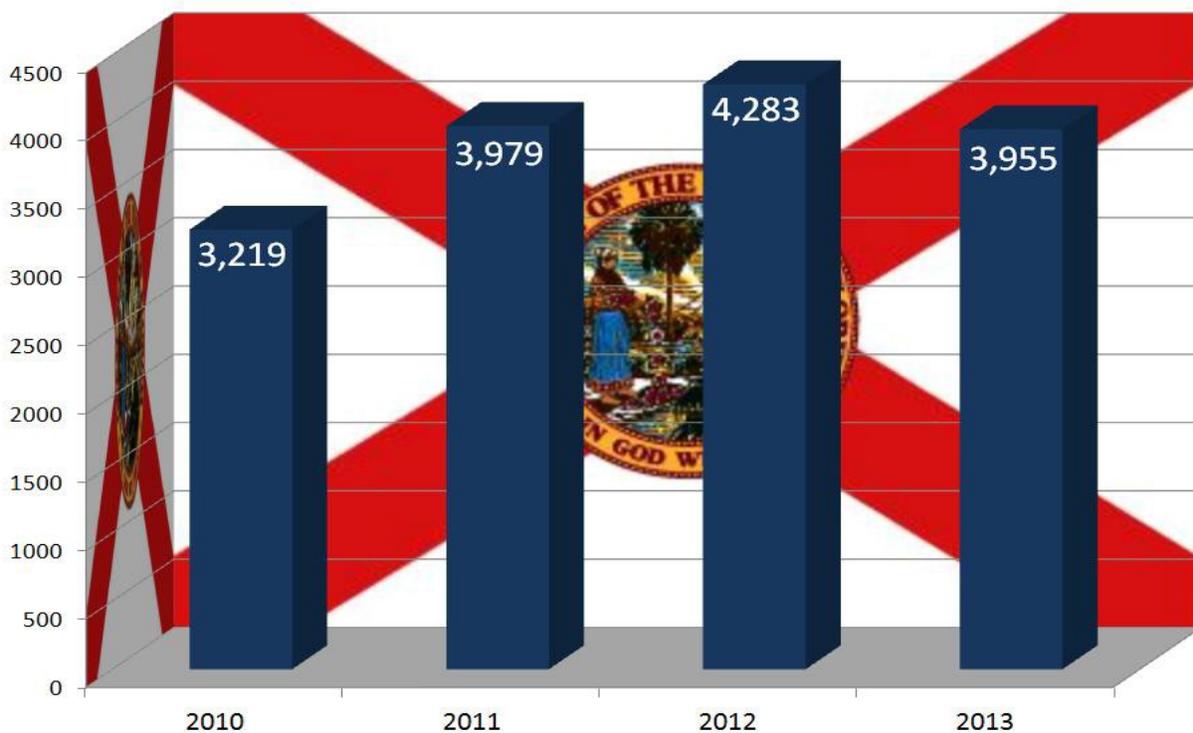
Other initiatives in the fight against PIP fraud used by DIF include:

- Partnering with the Florida Automobile Joint Underwriting Association (FAJUA) and the Florida Carpenters Union to provide financing for dedicated prosecutors throughout the state to handle insurance fraud cases. Most of them are focused on the prosecution of PIP fraud. Currently, there are 19 dedicated prosecutor positions in the state; in Miami-Dade, Broward, Palm Beach, Orange, Hillsborough, and Duval counties.
- Establishing close working relationships between the Division and other state agencies such as the Department of Health (DOH) and the Agency for Health Care Administration (AHCA) in the relinquishment or revocation of the licenses that these fraudsters have used to operate their schemes. Most licensees arrested by the Division surrender their licenses when the cases are prosecuted.

- Working closely with the National Insurance Crime Bureau (NICB), and participating in their South Florida and Central Florida Major Medical Fraud Task Forces.
- Partnering with the Florida Highway Patrol (FHP) to create a webpage to educate the public about staged crashes at www.flhsmv.gov/fhp/misc/StagedCrashes.htm.
- Operating the anti-fraud reward program where anyone with information of suspected insurance fraud is asked to call 1-800-378-0445. Citizens who provide tips can remain anonymous. The Department of Financial Services to date has awarded nearly \$350,000 as part of its Anti-Fraud Reward Program. The program rewards individuals up to \$25,000 for information that directly leads to an arrest and conviction in an insurance fraud scheme.

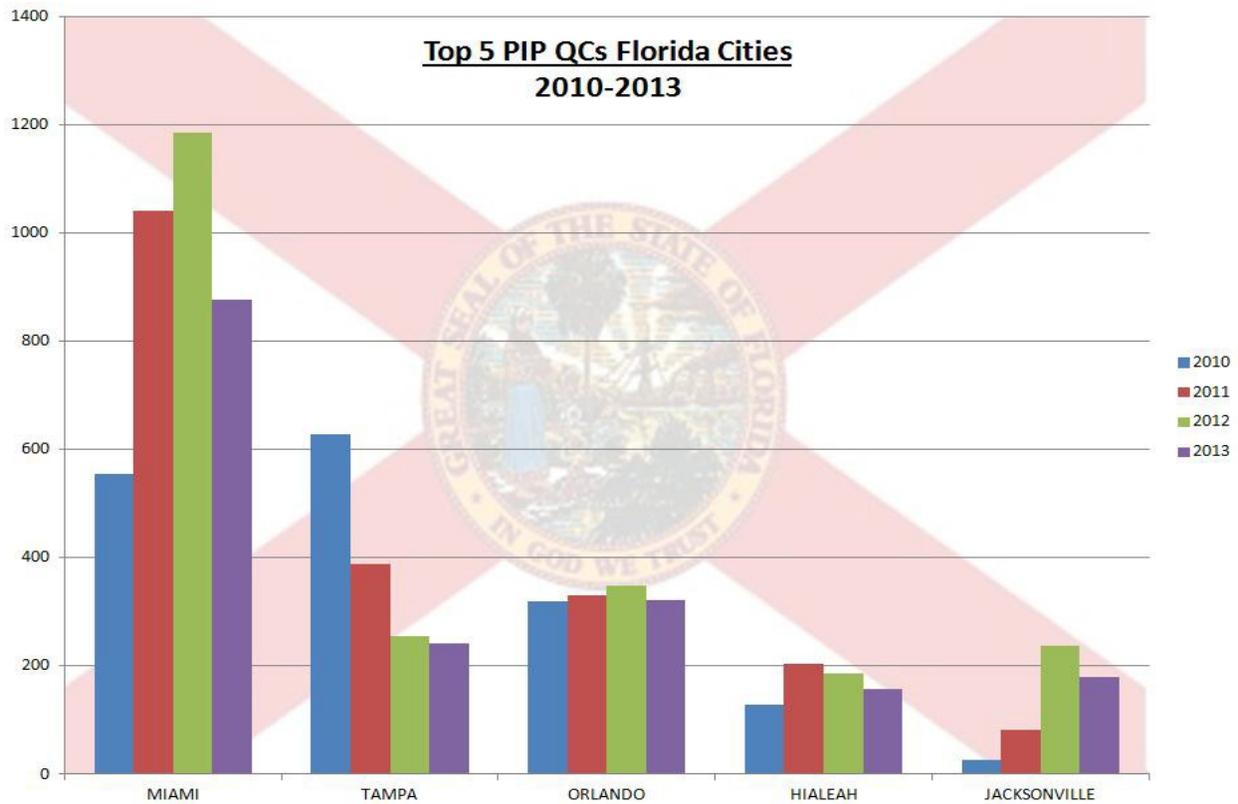
A recent study by the National Insurance Crime Bureau shows that there has been a reduction in the number of questionable PIP claims (those suspected of fraud) since 2012.

Florida PIP QCs from 2010 - 2013



Source: Report contained in National Insurance Crime Bureau's News Release, dated March 27, 2014, titled "Florida's No-Fault Reform: Trending in the Right Direction"

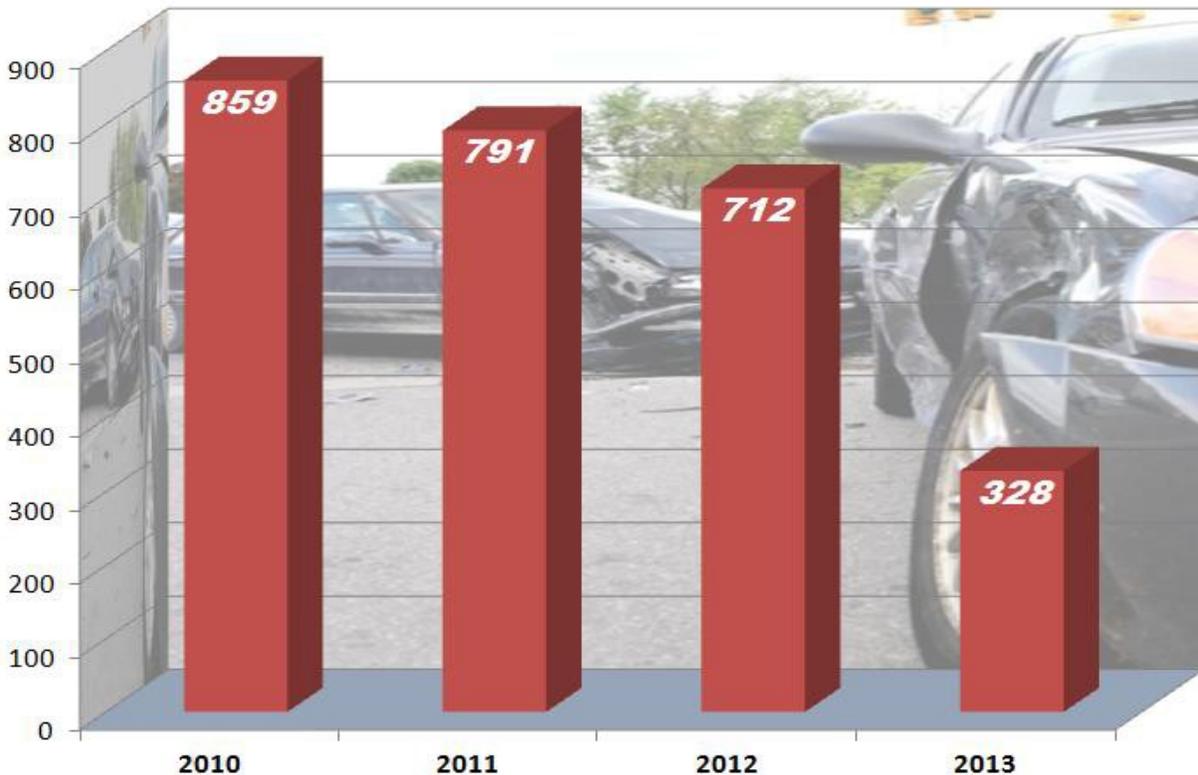
The Tampa area became the state leader in the number of suspicious auto accidents that were staged or deliberately caused by criminals in 2010. That dubious honor now belongs to the Miami area.



Source: Report contained in National Insurance Crime Bureau's News Release, dated March 27, 2014, titled "Florida's No-Fault Reform: Trending in the Right Direction"

The number of staged/caused accidents has dramatically dropped, almost 54%, since the implementation of HB 119.

Florida Staged/Caused Accidents 2010-2013



Source: Report contained in National Insurance Crime Bureau's News Release, dated March 27, 2014, titled "Florida's No-Fault Reform: Trending in the Right Direction"

As can be seen from the charts above, insurance fraud (and in particular PIP insurance fraud) is a major issue across the state. Based on anecdotal evidence from the insurers, fraud contributed significantly to rate increases filed prior to HB 119. In addition to raising rates, insurers have tried to reduce their costs from insurance fraud by tightening their underwriting requirements. For example, many insurers will no longer accept an insured for new business if that insured has had a PIP claim within the last three years.

5. Rate Filings

In order to determine the impact of HB 119 on the average personal auto policyholder, the Office compiled a summary of the rate filings, as of December 19, 2014, that were effective between January 1, 2011 and January 1, 2015 for the top 25 insurers (see Appendix A).

The top 25 insurers represent 80.9% of the total personal auto market in Florida. The Office segregated the filings into two sets of data: Pre-HB 119 and Post-HB 119. Post-HB 119 includes all filings submitted since, and including, the first required HB 119 filing that was due on October 1, 2012.

The average statewide approved rate changes were:

	<u>Pre-HB 119</u>	<u>Post-HB 119</u>
PIP	+46.3%	-13.6%
Liability (incl. PIP)	+20.9%	-0.5%
Overall (incl. Comp. and Coll.)	+12.9%	-0.1%

The above rate changes are on a statewide average basis and the rate changes would vary significantly by insurer and territory. For instance, while the average statewide PIP change Post-HB 119 was a decrease of 13.6%, the actual statewide averages for individual insurers varied from a decrease of 32.3% to an increase of 40.6%. In addition to differences by insurer, there would also be significant differences from territory to territory. Appendix A contains a summary of the rate filings by insurer and includes a breakdown of the liability changes into the individual coverages.

As stated under Section I, the Pinnacle Report estimated the range of possible PIP premium savings due to HB 119 to be between 14.0% and 24.6%. This estimate assumed that the current rates (at the time of the report) were adequate. The report went on to warn that, to the extent that the current PIP rates were inadequate, it is likely that insurers would offset the savings from HB 119 against the otherwise indicated PIP rates. Most insurers, prior to HB 119, were experiencing a significant deterioration in losses. While the insurers were able to support increases in the PIP rates based on this deterioration, many insurers did not, or could not, keep up with the extreme changes. At the time of the implementation of the bill, there were many insurers that had residual rate need in PIP which were used to offset some of the expected savings of the bill.

While there is limited data to determine the true impact of HB 119 at this time, it is safe to say that the bill significantly impacted the personal auto market and changed the trajectory of the trends that were being seen prior to the bill.

IV. Appendices

Appendix A - Rate Changes - Top 25 Insurers

Rate Changes (Pre/Post HB119)

since 01/01/11

<u>Group Code</u>	<u>NAIC</u>	<u>Company</u>	<u>Pre HB119</u>			<u>Post HB119</u>			<u>Latest Earned Prem</u>
			<u>PIP</u>	<u>Liability Coverages</u>	<u>Overall</u>	<u>PIP</u>	<u>Liability Coverages</u>	<u>Overall</u>	
176	25178	State Farm Mutual Auto Insurance Co.	62.5%	11.8%	5.3%	-1.6%	-4.2%	-4.7%	\$2,377,512,000
31	35882	Geico General Insurance Co. &	50.6%	28.5%	16.0%	-25.0%	-1.4%	0.6%	\$1,841,238,000
	22063	Government Employees Insurance Co.							
	22055	Geico Indemnity Co.	36.1%	22.2%	14.3%	-25.1%	-7.8%	-5.0%	\$618,913,284
155	24252	Progressive American Insurance Co.	20.1%	10.9%	6.7%	-32.3%	-12.5%	-11.6%	\$977,108,766
	10192	Progressive Select Insurance Co.	24.6%	11.5%	7.4%	-27.9%	-15.7%	-13.2%	\$712,189,363
8	29688	Allstate Fire and Casualty Insurance Co.	75.8%	44.5%	31.1%	-5.2%	4.2%	4.7%	\$658,541,000
	19232	Allstate Insurance Company	35.1%	21.6%	8.4%	-21.4%	6.7%	4.9%	\$439,953,000
	17230	Allstate Prop & Cas Insurance Company	57.0%	30.6%	23.5%	-23.5%	4.0%	3.9%	\$253,584,417
	30210	Esurance Prop & Cas Insurance Company	12.7%	-1.2%	0.5%	20.9%	15.8%	17.0%	\$182,186,490
200	25941	United Services Automobile Association	34.0%	5.6%	0.1%	-25.0%	1.3%	0.9%	\$373,386,183
	25968	USAA Casualty Insurance Company	25.0%	4.9%	1.1%	-24.1%	-3.2%	-3.1%	\$262,873,921
	18600	USAA General Indemnity Company	36.0%	8.5%	0.0%	-10.2%	4.6%	3.0%	\$88,667,978
212	34789	21st Century Centennial Insurance Co.	80.7%	28.2%	21.1%	40.6%	31.3%	26.9%	\$318,889,302
	33120	Security National Insurance Company	26.3%	29.2%	29.3%	-27.8%	-3.8%	-3.0%	\$182,369,282
3548	27998	Travelers Home & Marine Insurance Co.	31.8%	31.9%	24.7%	-10.4%	17.2%	15.7%	\$288,885,650
3495	11738	Infinity Auto Insurance Company	18.2%	33.4%	10.4%	-14.6%	16.0%	13.5%	\$257,005,942
	10061	Infinity Indemnity Insurance Company	37.6%	27.8%	22.7%	-21.3%	0.0%	-0.7%	\$114,242,141
1213	42781	Direct General Insurance Company	13.9%	14.1%	11.3%	4.8%	6.5%	5.4%	\$205,417,236
111	39012	Safeco Insurance Company of IL	136.5%	51.6%	38.3%	17.7%	16.3%	22.0%	\$205,417,236
1235	1235	United Automobile Insurance Company	62.8%	43.5%	35.5%	-17.3%	-12.3%	-11.8%	\$138,572,893
241	40169	Metropolitan Casualty Insurance Co.	31.3%	17.4%	11.9%	-6.0%	3.8%	5.0%	\$166,440,524
280	10190	Southern-Owners Insurance Company	27.6%	18.5%	13.1%	-12.8%	13.0%	10.5%	\$160,966,551
483	21817	Florida Farm Bureau General Insurance Co.	-1.0%	3.3%	0.4%	7.9%	10.8%	6.4%	\$113,472,552
-	12541	Windhaven Insurance Company	65.9%	50.8%	42.9%	-5.4%	2.1%	1.6%	\$149,907,627
Total 25 Companies Weighted Average			46.3%	20.9%	12.9%	-13.6%	-0.5%	-0.1%	

Appendix A - Rate Changes - Top 25 Insurers

Filings since: 01/01/11	
Group Code: 176	
<u>Company</u>	<u>NAIC</u>
State Farm Mutual Auto Insurance Co.	25178

<u>Company</u>	<u>Filing Number</u>	<u>Effective Date (New)</u>	<u>Category</u>	<u>BI</u>	<u>PD</u>	<u>UM</u>	<u>MP</u>	<u>PIP</u>	<u>Liability (BI+..+PIP)</u>	<u>Overall</u>	<u>Earned Prem</u>	<u>Pending?</u>
State Farm Mutual Auto Insurance Co.	11-02568	6/27/2011		4.7%	4.7%	0.0%	0.2%	25.0%	8.0%	4.3%	\$2,870,574,000	
	12-03094	6/25/2012		-3.0%	-3.0%	-12.0%	-3.3%	30.0%	3.5%	1.0%	\$2,849,362,000	
	12-15711	3/11/2013	HB119 10-1-12 Rate Filing	-6.2%	-6.2%	-14.0%	-5.6%	7.9%	-2.9%	-3.1%	\$2,618,233,000	
	13-22695	6/2/2014	HB119 1-1-14 Rate Filing	3.0%	3.0%	0.0%	0.0%	-8.8%	-1.3%	-1.6%	\$2,377,512,000	
			<i>Cumulative pre HB119</i>	1.6%	1.6%	-12.0%	-3.1%	62.5%	11.8%	5.3%		
			<i>Cumulative post HB119</i>	-3.4%	-3.4%	-14.0%	-5.6%	-1.6%	-4.2%	-4.7%		
			<i>Cumulative Total</i>	-1.9%	-1.9%	-24.3%	-8.5%	59.9%	7.1%	0.4%		

Comment

Appendix A - Rate Changes - Top 25 Insurers

Filings since: 01/01/11	
Group Code: 31	
<u>Company</u>	<u>NAIC</u>
Geico General Insurance Co.	35882
Geico Indemnity Co.	22055
Government Employees Insurance Co.	22063

<u>Company</u>	<u>Filing Number</u>	<u>Effective Date (New)</u>	<u>Category</u>	<u>BI</u>	<u>PD</u>	<u>UM</u>	<u>MP</u>	<u>PIP</u>	<u>Liability (BI+..+PIP)</u>	<u>Overall</u>	<u>Earned Prem</u>	<u>Pending?</u>
Geico General Insurance Co. &	10-17911	1/20/2011		0.0%	0.0%	0.0%	0.0%	0.0%	0.0	0.0%	\$1,306,788,370	
Government Employees Insurance Co.	10-21043	3/10/2011		9.0%	0.0%	-20.0%	0.0%	20.5%	0.1	4.9%	\$1,306,788,370	
	10-21164	3/14/2011		0.0%	0.0%	0.0%	0.0%	0.0%	0.0	0.0%	\$1,306,788,000	
	11-05816	2/28/2011		0.0%	0.0%	0.0%	0.0%	0.0%	0.0	0.0%	\$1,414,810,000	
	11-06213	6/27/2011		0.0%	0.0%	0.0%	0.0%	0.0%	0.0	0.0%	\$1,414,810,000	
	11-09184	8/16/2011		12.1%	0.5%	0.0%	0.1%	14.8%	0.1	5.3%	\$1,414,810,000	
	11-18899	11/24/2011		6.5%	5.4%	0.0%	8.0%	8.9%	0.1	5.0%	\$1,584,167,000	
	12-15922	1/1/2013	HB119 10-1-12 Rate Filing	4.9%	9.0%	5.1%	10.1%	-10.0%	0.0	0.7%	\$1,837,075,000	
	12-16823	1/2/2013		0.0%	0.0%	0.0%	0.0%	0.0%	0.0	0.0%	\$1,850,393,000	
	12-20399	2/28/2013		0.0%	0.0%	0.0%	0.0%	0.0%	0.0	0.0%	\$1,850,392,947	
	13-19204	1/17/2014	HB119 1-1-14 Rate Filing	1.0%	15.0%	4.0%	5.0%	-16.7%	0.0	-0.1%	\$1,843,375,000	
	13-20642	1/6/2014		0.0%	0.0%	0.0%	0.0%	0.0%	0.0	0.0%	\$1,841,238,000	
			Cumulative pre HB119	30.1%	5.9%	-20.0%	8.1%	50.6%	28.5%	16.0%		
			Cumulative post HB119	5.9%	25.4%	9.3%	15.6%	-25.0%	-1.4%	0.6%		
			Cumulative Total	37.9%	32.8%	-12.6%	25.0%	12.9%	26.7%	16.7%		
Geico Indemnity Insurance Co.	10-17911	1/20/2011		0.0%	0.0%	0.0%	0.0%	0.0%	0.0	0.0%	\$589,682,044	
	10-21043	3/10/2011		12.0%	-4.0%	0.0%	0.0%	17.8%	0.1	4.7%	\$589,682,044	
	10-21164	3/14/2011		0.0%	0.0%	0.0%	0.0%	0.0%	0.0	0.0%	\$589,682,000	
	11-05816	2/28/2011		0.0%	0.0%	0.0%	0.0%	0.0%	0.0	0.0%	\$560,613,000	
	11-06213	6/27/2011		0.0%	0.0%	0.0%	0.0%	0.0%	0.0	0.0%	\$560,613,000	
	11-09184	8/16/2011		10.1%	0.0%	5.3%	12.0%	8.1%	0.1	4.5%	\$560,613,191	
	11-18899	11/24/2011		5.2%	4.8%	-0.1%	9.8%	6.9%	0.0	4.5%	\$588,174,518	
	12-15922	1/1/2013	HB119 10-1-12 Rate Filing	0.0%	10.1%	7.1%	10.2%	-10.0%	0.0	-1.9%	\$662,273,146	
	12-16823	1/24/2013		0.0%	0.0%	0.0%	0.0%	0.0%	0.0	0.0%	\$649,813,122	
	12-20399	2/28/2013		0.0%	0.0%	0.0%	0.0%	0.0%	0.0	0.0%	\$649,813,122	
	13-19204	1/17/2014	HB119 1-1-14 Rate Filing	-0.2%	13.5%	-0.1%	15.1%	-16.8%	0.0	-3.2%	\$639,134,654	
	13-20642	1/17/2014		0.0%	0.0%	0.0%	0.0%	0.0%	0.0	0.0%	\$618,913,284	
			Cumulative pre HB119	29.7%	0.6%	5.2%	23.0%	36.1%	22.2%	14.3%		
			Cumulative post HB119	-0.2%	25.0%	7.0%	26.8%	-25.1%	-7.8%	-5.0%		
			Cumulative Total	29.5%	25.7%	12.6%	56.0%	1.9%	12.7%	8.6%		

Comment

Geico General and Government Employees share same rates and file together

Appendix A - Rate Changes - Top 25 Insurers

Filings since: 01/01/11	
Group Code: 155	
<u>Company</u>	<u>NAIC</u>
Progressive American Insurance Co.	24252
Progressive Select Insurance Co.	10192

<u>Company</u>	<u>Filing Number</u>	<u>Effective Date (New)</u>	<u>Category</u>	<u>BI</u>	<u>PD</u>	<u>UM</u>	<u>MP</u>	<u>PIP</u>	<u>Liability (BI+..+PIP)</u>	<u>Overall</u>	<u>Earned Prem</u>	<u>Pending?</u>	
Progressive American Insurance Co.	11-04135	2/11/2011		3.9%	4.0%	3.0%	0.0%	2.3%	0.0	1.2%	\$693,665,913		
	11-10451	6/3/2011		-5.4%	-4.0%	0.0%	0.0%	-5.0%	0.0	-4.1%	\$632,711,198		
	12-00496	12/16/2011		0.1%	0.3%	1.0%	9.7%	-0.1%	0.0	0.1%	\$593,196,302		
	12-07152	3/30/2012		1.8%	0.6%	1.3%	7.1%	11.5%	0.0	4.0%	\$614,094,159		
	12-13153	7/13/2012		2.1%	9.7%	4.0%	6.8%	10.9%	0.1	5.6%	\$682,467,814		
	12-15814	11/9/2012	HB119 10-1-12 Rate Filing	0.0%	0.0%	0.0%	0.0%	-10.0%	0.0	-3.0%	\$779,785,682		
	13-02442	2/8/2013		-3.6%	-4.5%	0.0%	0.0%	0.0%	0.0	-2.7%	\$807,313,182		
	13-10205	4/19/2013		-1.4%	-0.7%	-0.1%	3.7%	-4.0%	0.0	-1.7%	\$833,076,789		
	13-15625	7/26/2013		-4.0%	0.3%	1.9%	-0.1%	-10.5%	0.0	-3.7%	\$838,539,794		
	13-21498	11/22/2013	HB119 1-1-14 Rate Filing	4.4%	0.0%	3.4%	-2.1%	-12.5%	0.0	-1.2%	\$831,115,685		
	14-10315	4/25/2014		2.5%	0.0%	4.0%	-17.5%	0.0%	0.0	0.0%	\$912,351,855		
	14-17973	9/19/2014		0.0%	2.3%	2.9%	-12.0%	0.1%	0.0	0.1%	\$977,108,766	Yes	
				Cumulative pre HB119	2.3%	10.5%	9.6%	25.5%	20.1%	10.9%	6.7%		
				Cumulative post HB119	-2.4%	-2.7%	12.6%	-26.4%	-32.3%	-12.5%	-11.6%		
			Cumulative Total	-0.1%	7.5%	23.5%	-7.6%	-18.7%	-3.0%	-5.7%			
Progressive Select Insurance Co.	11-04136	2/11/2011		-1.6%	3.5%	4.3%	0.2%	4.3%	0.0	0.9%	\$644,938,390		
	11-10452	6/3/2011		-2.3%	-0.6%	-0.8%	0.0%	-2.8%	0.0	-1.6%	\$619,497,199		
	12-00497	12/16/2011		-1.6%	3.5%	4.5%	19.7%	1.1%	0.0	0.4%	\$599,121,764		
	12-07153	3/30/2012		1.3%	0.9%	1.1%	10.0%	20.0%	0.1	4.8%	\$603,768,258		
	12-13158	7/13/2012		2.4%	1.4%	9.7%	13.1%	12.6%	0.1	4.9%	\$652,916,479		
	12-15813	11/9/2012		3.3%	0.0%	0.0%	0.0%	-10.0%	0.0	-2.0%	\$718,398,818		
	13-02443	2/8/2013	HB119 10-1-12 Rate Filing	-4.5%	-0.1%	-0.8%	0.0%	0.0%	0.0	-1.9%	\$731,095,727		
	13-10204	4/19/2013		-4.7%	3.4%	-4.2%	0.0%	-8.2%	0.0	-3.1%	\$730,466,694		
	13-15624	7/26/2013		-6.4%	-2.5%	-5.2%	0.0%	-10.0%	-0.1	-4.9%	\$707,779,660		
	13-21497	11/22/2013	HB119 1-1-14 Rate Filing	-7.0%	0.2%	-6.0%	1.5%	-12.0%	-0.1	-4.0%	\$673,876,991		
	14-10316	4/25/2014		-1.0%	3.1%	-6.5%	-11.5%	0.0%	0.0	0.0%	\$673,251,942		
	14-17975	9/19/2014		0.0%	0.3%	0.0%	-16.0%	-0.9%	0.0	0.0%	\$712,189,363	Yes	
				Cumulative pre HB119	1.4%	8.9%	19.9%	49.2%	24.6%	11.5%	7.4%		
				Cumulative post HB119	-21.6%	4.4%	-20.8%	-24.5%	-27.9%	-15.7%	-13.2%		
			Cumulative Total	-20.5%	13.7%	-5.0%	12.6%	-10.2%	-6.1%	-6.8%			

Comment

Appendix A - Rate Changes - Top 25 Insurers

Filings since: 01/01/11	
Group Code: 8	
<u>Company</u>	<u>NAIC</u>
Allstate Fire and Casualty Insurance Co.	29688
Allstate Insurance Company	19232
Allstate Prop & Cas Insurance Company	17230
Esurance Prop & Cas Insurance Company	30210

<u>Company</u>	<u>Filing Number</u>	<u>Effective Date (New)</u>	<u>Category</u>	<u>BI</u>	<u>PD</u>	<u>UM</u>	<u>MP</u>	<u>PIP</u>	<u>Liability (BI+..+PIP)</u>	<u>Overall</u>	<u>Earned Prem</u>	<u>Pending?</u>
Allstate Fire and Casualty Insurance Co.	10-17968	3/14/2011		35.0%	14.0%	12.0%	4.0%	44.0%	0.302877	20.9%	\$425,699,974	
	11-09622	10/17/2011		0.0%	0.0%	0.0%	0.0%	0.0%	0	0.0%	\$425,699,974	
	12-02887	7/16/2012		9.0%	6.0%	0.0%	9.0%	11.0%	0.078382	6.1%	\$474,007,019	
	12-09593	1/1/2013		0.0%	2.0%	0.0%	0.0%	10.0%	0.028381	2.2%	\$520,804,324	
	12-16208	1/1/2013	HB119 10-1-12 Rate Filing	0.0%	0.0%	0.0%	0.0%	0.0%	0	0.0%	\$532,160,000	
	13-02436	7/15/2013		0.0%	-0.1%	0.0%	-0.1%	0.0%	-0.00019	0.0%	\$513,202,621	
	13-06688	3/18/2013		0.0%	0.0%	0.0%	-0.1%	-0.1%	-0.00027	0.0%	\$533,219,009	
	13-10175	7/15/2013		0.0%	0.0%	0.0%	0.0%	0.0%	0	0.0%	\$557,726,905	
	13-13012	12/23/2013		0.1%	0.0%	0.0%	0.0%	0.1%	0.000642	0.1%	\$545,958,425	
	13-16921	11/18/2013		8.0%	5.0%	-4.0%	0.0%	-0.1%	0.034061	4.0%	\$563,756,662	
	13-22291	5/5/2014	HB119 1-1-14 Rate Filing	4.8%	3.0%	-3.6%	0.0%	-5.0%	0.007449	0.6%	\$654,799,000	
	14-06192	5/5/2014		0.0%	0.0%	0.0%	-0.1%	-0.1%	-0.00025	0.0%	\$658,541,000	
				Cumulative pre HB119	47.2%	23.3%	12.0%	13.4%	75.8%	44.5%	31.1%	
			Cumulative post HB119	13.3%	8.0%	-7.5%	-0.3%	-5.2%	4.2%	4.7%		
			Cumulative Total	66.7%	33.2%	3.6%	13.0%	66.7%	50.5%	37.3%		
Allstate Insurance Company	10-18718	3/14/2011		10.0%	5.0%	3.2%	9.9%	17.0%	0.094842	2.3%	\$586,061,097	
	11-06357	8/1/2011		12.7%	21.0%	-10.3%	7.8%	15.5%	0.110435	6.0%	\$579,262,507	
	11-09622	10/17/2011		0.0%	0.0%	0.0%	0.0%	0.0%	0	0.0%	\$579,262,507	
	12-16200	1/1/2013	HB119 10-1-12 Rate Filing	0.0%	0.0%	0.0%	0.0%	-10.0%	-0.02487	-1.9%	\$487,276,600	
	12-18423	1/14/2013		0.0%	0.0%	0.0%	0.0%	0.0%	0	0.0%	\$469,273,550	
	13-21865	1/13/2014		0.0%	0.0%	0.0%	0.0%	0.0%	0	0.0%	\$454,163,000	
	13-22294	3/17/2014	HB119 1-1-14 Rate Filing	8.7%	0.4%	4.4%	0.0%	-12.7%	0.013938	1.0%	\$454,163,000	
	14-14531	9/22/2014		13.4%	0.0%	13.4%	5.0%	0.0%	0.079303	5.9%	\$439,953,000	Yes
			Cumulative pre HB119	24.0%	27.1%	-7.4%	18.5%	35.1%	21.6%	8.4%		
			Cumulative post HB119	23.3%	0.4%	18.4%	5.0%	-21.4%	6.7%	4.9%		
			Cumulative Total	52.8%	27.6%	9.6%	24.4%	6.2%	29.7%	13.8%		

Appendix A - Rate Changes - Top 25 Insurers

Filings since: 01/01/11	
Group Code: 8	
<u>Company</u>	<u>NAIC</u>
Allstate Fire and Casualty Insurance Co.	29688
Allstate Insurance Company	19232
Allstate Prop & Cas Insurance Company	17230
Esurance Prop & Cas Insurance Company	30210

<u>Company</u>	<u>Filing Number</u>	<u>Effective Date (New)</u>	<u>Category</u>	<u>BI</u>	<u>PD</u>	<u>UM</u>	<u>MP</u>	<u>PIP</u>	<u>Liability (BI+..+PIP)</u>	<u>Overall</u>	<u>Earned Prem</u>	<u>Pending?</u>
Allstate Prop & Cas Insurance Company	11-06355	8/1/2011		30.0%	0.0%	0.0%	2.0%	57.0%	0.276559	20.0%	\$584,133,767	
	11-09622	10/17/2011		0.0%	0.0%	0.0%	0.0%	0.0%	0	0.0%	\$584,133,767	
	12-12510	1/1/2013		0.0%	15.0%	0.0%	10.0%	0.0%	0.023218	2.9%	\$404,537,496	
	12-16203	1/1/2013	HB119 10-1-12 Rate Filing	0.0%	0.0%	0.0%	0.0%	-10.0%	-0.02905	-2.3%	\$416,167,436	
	13-21866	1/13/2014		0.0%	0.0%	0.0%	0.0%	0.0%	0	0.0%	\$274,549,000	
	13-22293	3/17/2014	HB119 1-1-14 Rate Filing	11.2%	8.8%	-5.0%	-7.0%	-15.0%	0.008252	1.5%	\$274,549,000	
	14-14548	9/22/2014		12.9%	0.0%	5.0%	0.0%	0.0%	0.06273	4.8%	\$253,584,417	Yes
			Cumulative pre HB119	30.0%	15.0%	0.0%	12.2%	57.0%	30.6%	23.5%		
			Cumulative post HB119	25.5%	8.8%	-0.3%	-7.0%	-23.5%	4.0%	3.9%		
			Cumulative Total	63.2%	25.1%	-0.3%	4.3%	20.1%	35.9%	28.3%		
Esurance Prop & Cas Insurance Company	11-02750	1/28/2011		-10.5%	-10.5%	-10.3%	-10.5%	-10.5%	-0.10467	-10.5%	\$179,275,222	
	11-19990	3/22/2012		0.0%	13.9%	0.0%	30.4%	25.9%	0.104063	12.3%	\$26,719,919	
	12-15707	8/24/2012	HB119 10-1-12 Rate Filing	0.0%	0.0%	0.0%	0.0%	0.0%	0	0.0%	\$104,056,717	
	12-17452	9/28/2012		3.8%	10.7%	9.6%	0.0%	19.5%	0.111404	9.5%	\$104,056,733	
	13-02357	4/25/2013		0.0%	3.0%	0.0%	8.0%	12.0%	0.050482	5.0%	\$137,024,449	
	13-22688	4/7/2014	HB119 1-1-14 Rate Filing	0.0%	10.0%	10.0%	10.0%	-9.7%	-0.00778	1.8%	\$182,186,490	
				Cumulative pre HB119	-10.5%	1.9%	-10.3%	16.7%	12.7%	-1.2%	0.5%	
			Cumulative post HB119	3.8%	25.4%	20.6%	18.8%	20.9%	15.8%	17.0%		
			Cumulative Total	-7.1%	27.9%	8.1%	38.6%	36.2%	14.5%	17.6%		

Comment

Appendix A - Rate Changes - Top 25 Insurers

Filings since: 01/01/11	
Group Code: 200	
<u>Company</u>	<u>NAIC</u>
United Services Automobile Association	25941
USAA Casualty Insurance Company	25968
USAA General Indemnity Company	18600

<u>Company</u>	<u>Filing Number</u>	<u>Effective Date (New)</u>	<u>Category</u>	<u>BI</u>	<u>PD</u>	<u>UM</u>	<u>MP</u>	<u>PIP</u>	<u>Liability (BI+..+PIP)</u>	<u>Overall</u>	<u>Earned Prem</u>	<u>Pending?</u>
United Services Auto. Asso. (USAA)	11-16102	5/19/2012		4.5%	-5.0%	0.0%	12.0%	34.0%	5.6%	0.1%	\$339,385,065	
	12-15661	12/10/2012	HB119 10-1-12 Rate Filing	3.0%	1.0%	-1.0%	15.0%	-10.0%	0.0%	0.0%	\$345,676,488	
	13-05894	8/26/2013		7.0%	2.0%	2.0%	0.0%	0.0%	3.8%	2.6%	\$354,171,133	
	14-00313	4/21/2014	HB119 1-1-14 Rate Filing	0.0%	0.0%	0.0%	0.0%	-16.7%	-2.4%	-1.7%	\$363,728,950	
	14-04853	10/21/2014		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	\$373,386,183	
			Cumulative pre HB119	4.5%	-5.0%	0.0%	12.0%	34.0%	5.6%	0.1%		
			Cumulative post HB119	10.2%	3.0%	1.0%	15.0%	-25.0%	1.3%	0.9%		
			Cumulative Total	15.2%	-2.1%	1.0%	28.8%	0.5%	7.0%	1.0%		
USAA Casualty Insurance Co. (CIC)	11-16102	5/19/2012		4.0%	0.0%	-5.0%	4.0%	25.0%	4.9%	1.1%	\$243,762,915	
	12-15661	12/10/2012	HB119 10-1-12 Rate Filing	0.5%	2.0%	0.0%	15.0%	-10.0%	-1.1%	-0.8%	\$249,840,607	
	13-05894	8/26/2013		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	-0.3%	\$256,464,171	
	14-00313	4/21/2014	HB119 1-1-14 Rate Filing	0.0%	0.0%	0.0%	0.0%	-15.7%	-2.8%	-2.1%	\$263,821,962	
	14-04853	10/21/2014		0.0%	0.0%	3.8%	-2.5%	0.0%	0.6%	0.1%	\$262,873,921	
			Cumulative pre HB119	4.0%	0.0%	-5.0%	4.0%	25.0%	4.9%	1.1%		
			Cumulative post HB119	0.5%	2.0%	3.8%	12.1%	-24.1%	-3.2%	-3.1%		
			Cumulative Total	4.5%	2.0%	-1.4%	16.6%	-5.2%	1.5%	-2.0%		
USAA General Indemnity Co. (GIC)	11-16102	5/19/2012		0.0%	4.0%	0.0%	0.0%	36.0%	8.5%	0.0%	\$42,113,536	
	12-15661	12/10/2012	HB119 10-1-12 Rate Filing	12.0%	1.0%	-3.0%	1.0%	-8.5%	1.9%	-0.1%	\$47,982,775	
	13-05894	8/26/2013	HB119 1-1-14 Rate Filing	1.0%	12.0%	-5.0%	10.0%	-1.9%	2.4%	3.0%	\$57,475,777	
	14-04853	10/21/2014		0.0%	0.0%	0.0%	17.0%	0.0%	0.3%	0.1%	\$88,667,978	
				Cumulative pre HB119	0.0%	4.0%	0.0%	0.0%	36.0%	8.5%	0.0%	
			Cumulative post HB119	13.1%	13.1%	-7.9%	30.0%	-10.2%	4.6%	3.0%		
			Cumulative Total	13.1%	17.6%	-7.9%	30.0%	22.1%	13.5%	3.0%		

Comment

Appendix A - Rate Changes - Top 25 Insurers

Filings since: 01/01/11	
Group Code: 3548	
<u>Company</u>	<u>NAIC</u>
Travelers Home & Marine Insurance Co.	27998

<u>Company</u>	<u>Filing Number</u>	<u>Effective Date (New)</u>	<u>Category</u>	<u>BI</u>	<u>PD</u>	<u>UM</u>	<u>MP</u>	<u>PIP</u>	<u>Liability (BI+..+PIP)</u>	<u>Overall</u>	<u>Earned Prem</u>	<u>Pending?</u>
Travelers Home & Marine Insurance Co.	11-01691	4/10/2011		5.0%	0.0%	5.0%	3.0%	10.0%	5.0%	4.1%	\$188,801,125	
	11-07014	7/24/2011		2.0%	4.0%	4.0%	3.0%	10.0%	4.2%	2.9%	\$202,322,151	
	11-11857	10/23/2011		6.8%	6.8%	6.8%	6.8%	6.8%	6.8%	6.8%	\$233,688,327	
	11-19893	3/18/2012		20.1%	7.0%	15.9%	3.9%	2.0%	12.9%	9.0%	\$273,025,599	
	12-16025	12/28/2012	HB119 10-1-12 Rate Filing	10.5%	7.6%	1.2%	5.5%	8.5%	8.1%	8.0%	\$342,860,358	
	13-10074	7/26/2013	HB119 1-1-14 Rate Filing	2.0%	2.0%	1.4%	4.4%	1.9%	1.9%	2.0%	\$370,304,864	
	13-19699	2/7/2014		8.5%	7.1%	1.9%	4.4%	-10.0%	3.8%	3.0%	\$341,014,184	
	13-20812	2/16/2014		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	\$342,313,689	
	14-10290	8/8/2014		4.5%	2.0%	8.0%	5.0%	-10.0%	2.5%	2.0%	\$288,885,650	
			<i>Cumulative pre HB119</i>	37.4%	18.8%	35.2%	17.7%	31.8%	31.9%	24.7%		
			<i>Cumulative post HB119</i>	27.8%	19.9%	12.9%	20.7%	-10.4%	17.2%	15.7%		
			<i>Cumulative Total</i>	75.6%	42.5%	52.6%	42.1%	18.0%	54.6%	44.3%		

Comment

Appendix A - Rate Changes - Top 25 Insurers

Filings since: 01/01/11	
Group Code: 212	
<u>Company</u>	<u>NAIC</u>
21st Century Centennial Insurance Co.	34789
Security National Insurance Company	33120

<u>Company</u>	<u>Filing Number</u>	<u>Effective Date (New)</u>	<u>Category</u>	<u>BI</u>	<u>PD</u>	<u>UM</u>	<u>MP</u>	<u>PIP</u>	<u>Liability (BI+..+PIP)</u>	<u>Overall</u>	<u>Earned Prem</u>	<u>Pending?</u>
21st Century Centennial Insurance Co.	11-10976	6/27/2011		8.2%	0.2%	0.2%	0.2%	23.0%	8.9%	6.7%	\$57,796,830	
(AIGCI/50 Tier Program)	12-00580	12/26/2011		4.6%	9.6%	4.7%	0.0%	46.9%	17.7%	13.5%	\$134,928,514	
	12-12129	6/26/2012	HB119 10-1-12 Rate Filing	4.8%	5.4%	4.6%	9.2%	41.5%	19.5%	15.3%	\$192,790,668	
	13-05230	2/18/2013		4.2%	9.0%	0.0%	4.6%	10.4%	7.0%	7.0%	\$308,111,156	
	13-20344	3/24/2014	HB119 1-1-14 Rate Filing	12.9%	11.8%	0.9%	1.3%	-10.0%	2.6%	2.9%	\$318,889,302	
			Cumulative pre HB119	13.2%	9.8%	4.9%	0.2%	80.7%	28.2%	21.1%		
			Cumulative post HB119	23.3%	28.4%	5.5%	15.7%	40.6%	31.3%	26.9%		
			Cumulative Total	39.5%	41.1%	10.7%	15.9%	154.0%	68.2%	53.7%		
Security National Insurance Company	10-19847	2/24/2011		-2.0%	0.2%	-0.3%	4.2%	4.4%	2.2%	0.7%	\$178,178,707	
(Bristol West/Select 2.0 Program)	11-12937	7/12/2011		4.5%	5.0%	7.7%	4.5%	5.3%	5.1%	5.1%	\$174,088,319	
	12-00799	12/22/2011		0.0%	15.0%	16.9%	0.0%	5.1%	6.0%	7.0%	\$162,315,991	
	12-06637	3/22/2012		14.9%	14.3%	1.0%	0.0%	6.1%	9.7%	9.8%	\$216,533,948	
	12-14854	8/7/2012		2.4%	7.5%	0.0%	0.3%	3.1%	3.8%	4.4%	\$244,738,017	
	12-16052	1/1/2013	HB119 10-1-12 Rate Filing	8.4%	14.2%	2.4%	6.4%	-10.0%	0.4%	2.4%	\$250,098,905	
	13-11791	5/30/2013	HB119 1-1-14 Rate Filing	0.8%	-4.2%	0.0%	0.0%	-22.9%	-10.6%	-9.7%	\$212,523,766	
	14-10425	5/8/2014		13.5%	4.0%	7.6%	-1.2%	4.0%	7.3%	5.0%	\$178,873,687	
			Cumulative pre HB119	20.5%	48.7%	26.8%	9.2%	26.4%	29.6%	29.8%		
			Cumulative post HB119	24.0%	13.8%	10.2%	5.1%	-27.8%	-3.7%	-2.9%		
			Cumulative Total	49.4%	69.2%	39.7%	14.8%	-8.8%	24.8%	26.0%		
(Select 1.0 Program)	11-10225	5/19/2011		0.4%	-5.8%	0.0%	26.3%	26.3%	9.9%	6.7%	\$5,807,634	
	12-04412	2/23/2012		11.5%	0.0%	0.0%	0.0%	0.0%	2.6%	2.0%	\$5,272,672	
	12-16075	1/1/2013	HB119 10-1-12 Rate Filing	0.7%	3.0%	-0.2%	4.7%	-10.0%	-3.4%	-3.5%	\$3,939,000	
	14-00008	1/1/2014	HB119 1-1-14 Rate Filing	0.0%	0.0%	0.0%	0.0%	-16.7%	-7.2%	-5.3%	\$3,216,869	
			Cumulative pre HB119	11.9%	-5.8%	0.0%	26.3%	26.3%	12.8%	8.8%		
			Cumulative post HB119	0.7%	3.0%	-0.2%	4.7%	-25.0%	-10.4%	-8.6%		
			Cumulative Total	12.7%	-3.0%	-0.2%	32.2%	-5.3%	1.1%	-0.5%		

Appendix A - Rate Changes - Top 25 Insurers

Filings since: 01/01/11	
Group Code: 212	
<u>Company</u>	<u>NAIC</u>
21st Century Centennial Insurance Co.	34789
Security National Insurance Company	33120

<u>Company</u>	<u>Filing Number</u>	<u>Effective Date (New)</u>	<u>Category</u>	<u>BI</u>	<u>PD</u>	<u>UM</u>	<u>MP</u>	<u>PIP</u>	<u>Liability (BI+..+PIP)</u>	<u>Overall</u>	<u>Earned Prem</u>	<u>Pending?</u>
(Basic/Non-standard Program)	12-16054	1/1/2013	HB119 10-1-12 Rate Filing	-2.5%	-5.5%	-3.1%	-2.3%	-13.0%	-8.6%	-7.8%	\$358,780	
	13-22602	1/1/2014	HB119 1-1-14 Rate Filing	0.0%	0.0%	0.0%	0.0%	-13.8%	-6.8%	-5.3%	\$278,726	
			Cumulative pre HB119	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
			Cumulative post HB119	-2.5%	-5.5%	-3.1%	-2.3%	-25.0%	-14.8%	-12.7%		
			Cumulative Total	-2.5%	-5.5%	-3.1%	-2.3%	-25.0%	-14.8%	-12.7%		

<u>Weighted Average</u>							
Cumulative pre HB119	20.3%	47.4%	26.2%	9.6%	26.3%	29.2%	29.3%
Cumulative post HB119	23.5%	13.5%	9.9%	5.1%	-27.8%	-3.8%	-3.0%
Cumulative Total	48.6%	67.5%	38.8%	15.2%	-8.7%	24.2%	25.4%

Comment

Appendix A - Rate Changes - Top 25 Insurers

Filings since: 01/01/11	
Group Code: 3495	
<u>Company</u>	<u>NAIC</u>
Infinity Auto Insurance Company	11738
Infinity Indemnity Insurance Company	10061

<u>Company</u>	<u>Filing Number</u>	<u>Effective Date (New)</u>	<u>Category</u>	<u>BI</u>	<u>PD</u>	<u>UM</u>	<u>MP</u>	<u>PIP</u>	<u>Liability (BI+..+PIP)</u>	<u>Overall</u>	<u>Earned Prem</u>	<u>Pending?</u>	
Infinity Auto Insurance Company	11-05503	2/28/2011		0.8%	1.4%	11.3%	26.7%	6.1%	21.0%	3.1%	\$119,466,663		
	11-14991	8/15/2011		1.3%	1.6%	4.5%	5.1%	4.1%	2.7%	1.5%	\$121,479,944		
	12-01792	1/9/2012		4.4%	1.1%	4.7%	12.5%	6.1%	4.5%	3.1%	\$117,704,498		
	12-14897	8/13/2012		5.9%	1.6%	2.7%	2.2%	0.9%	2.6%	2.3%	\$133,544,491		
	12-16077	1/1/2013	HB119 10-1-12 Rate Filing	0.0%	0.0%	0.0%	0.0%	-2.4%	-1.1%	-0.9%	\$151,274,310		
	13-00059	12/3/2012		6.5%	12.0%	0.4%	10.9%	0.0%	4.4%	4.1%	\$169,449,599		
	13-16350	8/12/2013		1.1%	1.0%	7.2%	2.6%	0.3%	0.9%	0.6%	\$207,843,562		
	13-22249	11/30/2013	HB119 1-1-14 Rate Filing	12.9%	6.5%	15.2%	-0.8%	-8.0%	2.1%	2.0%	\$234,121,940		
	14-09232	5/5/2014		0.1%	-1.0%	0.0%	0.0%	-1.5%	-0.8%	-0.9%	\$237,114,267		
	14-12283	6/2/2014		11.6%	2.0%	11.5%	-1.0%	-3.7%	3.0%	2.9%	\$244,543,360	Yes	
	14-17882	9/15/2014		15.6%	3.2%	21.8%	-1.5%	0.0%	6.7%	5.1%	\$257,005,942	Yes	
				Cumulative pre HB119	12.9%	5.8%	25.1%	53.1%	18.2%	33.4%	10.4%		
				Cumulative post HB119	57.0%	25.5%	68.4%	10.1%	-14.6%	16.0%	13.5%		
			Cumulative Total	77.2%	32.9%	110.6%	68.5%	1.0%	54.7%	25.2%			
Infinity Indemnity Insurance Company	11-05503	2/28/2011		1.6%	6.1%	7.0%	9.0%	22.9%	14.5%	12.0%	\$34,077,075		
	11-14991	8/15/2011		1.9%	0.4%	3.2%	8.7%	0.2%	0.6%	0.2%	\$40,321,517		
	12-01792	1/9/2012		8.2%	5.4%	1.0%	24.4%	10.4%	8.8%	7.3%	\$40,778,461		
	12-14897	8/13/2012		5.9%	0.2%	1.4%	5.7%	1.2%	2.0%	1.9%	\$45,317,040		
	12-16077	1/1/2013	HB119 10-1-12 Rate Filing	0.0%	0.0%	0.0%	0.0%	-3.6%	-2.0%	-1.7%	\$49,104,901		
	13-00059	12/3/2012		1.3%	6.6%	2.3%	11.3%	0.0%	1.8%	1.5%	\$54,820,149		
	13-16350	8/12/2013		-0.1%	0.0%	2.9%	2.2%	0.4%	0.2%	0.1%	\$72,182,691		
	13-22249	11/30/2013	HB119 1-1-14 Rate Filing	12.8%	8.0%	6.7%	-0.5%	-14.9%	-2.9%	-2.5%	\$98,906,969		
	14-09232	5/5/2014		-0.1%	0.1%	0.0%	0.0%	-0.1%	0.0%	-0.1%	\$95,956,009	Yes	
	14-12283	6/2/2014		3.8%	0.3%	3.5%	-1.1%	-4.2%	-0.9%	-0.9%	\$110,068,586	Yes	
	14-17882	9/15/2014		13.2%	2.7%	8.8%	-2.4%	-0.1%	4.0%	3.0%	\$114,242,141	Yes	
				Cumulative pre HB119	18.6%	12.5%	13.1%	55.8%	37.6%	27.8%	22.7%		
				Cumulative post HB119	34.0%	18.7%	26.5%	9.2%	-21.3%	0.0%	-0.7%		
			Cumulative Total	59.0%	33.5%	43.0%	70.2%	8.3%	27.8%	21.8%			

Comment

Appendix A - Rate Changes - Top 25 Insurers

Filings since: 01/01/11	
Group Code: 1213	
<u>Company</u>	<u>NAIC</u>
Direct General Insurance Company	42781

<u>Company</u>	<u>Filing Number</u>	<u>Effective Date (New)</u>	<u>Category</u>	<u>BI</u>	<u>PD</u>	<u>UM</u>	<u>MP</u>	<u>PIP</u>	<u>Liability (BI+..+PIP)</u>	<u>Overall</u>	<u>Earned Prem</u>	<u>Pending?</u>
Direct General Insurance Company	11-09716	5/25/2011		12.9%	7.1%	3.8%	-0.8%	7.5%	7.9%	6.4%	\$163,563,289	
	11-19897	12/7/2011		0.0%	1.9%	0.0%	0.0%	-1.0%	-0.1%	-0.1%	\$159,219,000	
	12-10911	6/20/2012		0.0%	4.9%	2.8%	0.0%	7.0%	5.8%	4.7%	\$159,646,147	
	12-14858	1/1/2013	HB119 10-1-12 Rate Filing	0.0%	3.6%	0.0%	0.0%	-2.5%	-0.5%	0.0%	\$168,839,389	
	13-11395	6/19/2013		0.0%	5.0%	0.0%	0.0%	0.1%	1.5%	1.3%	\$194,809,611	
	13-16115	1/1/2014	HB119 1-1-14 Rate Filing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	\$104,083,000	
	14-11242	6/18/2014		0.1%	2.9%	-0.1%	0.0%	7.4%	5.5%	4.0%	\$205,417,236	
			Cumulative pre HB119	12.9%	14.5%	6.7%	-0.8%	13.9%	14.1%	11.3%		
			Cumulative post HB119	0.1%	11.9%	-0.1%	0.0%	4.8%	6.5%	5.4%		
			Cumulative Total	13.0%	28.1%	6.6%	-0.8%	19.4%	21.5%	17.2%		

Comment

Appendix A - Rate Changes - Top 25 Insurers

Filings since: 01/01/11	
Group Code: 111	
<u>Company</u>	<u>NAIC</u>
Safeco Insurance Company of IL	39012

<u>Company</u>	<u>Filing Number</u>	<u>Effective Date (New)</u>	<u>Category</u>	<u>BI</u>	<u>PD</u>	<u>UM</u>	<u>MP</u>	<u>PIP</u>	<u>Liability (BI+..+PIP)</u>	<u>Overall</u>	<u>Earned Prem</u>	<u>Pending?</u>
Safeco Insurance Company of IL	11-00039	5/14/2011		19.0%	1.0%	19.0%	10.0%	32.0%	17.8%	13.1%	\$115,673,179	
	11-12233	12/10/2011		13.0%	3.0%	1.0%	2.0%	28.0%	13.0%	10.0%	\$133,785,331	
	12-04790	8/11/2012		4.5%	0.0%	1.3%	40.0%	40.0%	13.9%	11.2%	\$169,267,495	
	12-14660	10/1/2012	HB119 10-1-12 Rate Filing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	\$172,868,000	
	12-20459	3/21/2013		0.0%	21.0%	0.0%	75.0%	11.0%	7.2%	7.5%	\$190,225,461	
	13-14103	11/9/2013	HB119 1-1-14 Rate Filing	0.0%	7.4%	2.5%	0.0%	0.0%	1.4%	5.1%	\$211,952,277	
	13-20919	3/20/2014		-10.0%	12.0%	15.0%	0.0%	6.0%	1.5%	4.0%	\$225,406,800	
	14-12654	11/8/2014		3.5%	10.6%	14.6%	-0.3%	0.0%	5.4%	3.8%	\$247,322,829	
			<i>Cumulative pre HB119</i>	40.5%	4.0%	21.8%	57.1%	136.5%	51.6%	38.3%		
			<i>Cumulative post HB119</i>	-6.9%	61.0%	35.1%	74.5%	17.7%	16.3%	22.0%		
			<i>Cumulative Total</i>	30.9%	67.5%	64.5%	174.1%	178.3%	76.2%	68.7%		

Comment

Appendix A - Rate Changes - Top 25 Insurers

Filings since: 01/01/11	
Group Code: 1235	
<u>Company</u>	<u>NAIC</u>
United Automobile Insurance Company	1235

<u>Company</u>	<u>Filing Number</u>	<u>Effective Date (New)</u>	<u>Category</u>	<u>BI</u>	<u>PD</u>	<u>UM</u>	<u>MP</u>	<u>PIP</u>	<u>Liability (BI+..+PIP)</u>	<u>Overall</u>	<u>Earned Prem</u>	<u>Pending?</u>
United Automobile Insurance Company	11-07293	6/1/2011		-0.3%	11.8%	0.0%	0.0%	14.2%	10.9%	9.1%	\$142,649,714	
	11-12865	9/1/2011		0.0%	0.0%	0.0%	7.5%	9.4%	5.9%	5.1%	\$155,692,196	
	11-17514	11/15/2011		-1.3%	11.2%	5.6%	55.9%	12.7%	10.0%	8.2%	\$180,304,225	
	12-04405	4/1/2012		-0.4%	6.2%	-1.1%	-0.7%	15.6%	11.1%	9.2%	\$204,380,379	
	12-15386	10/1/2012	HB119 10-1-12 Rate Filing	-0.5%	5.9%	0.0%	0.0%	18.3%	13.0%	11.2%	\$212,428,472	
	13-06109	5/1/2013		-0.2%	1.6%	0.0%	0.0%	-1.8%	-1.0%	-1.1%	\$203,626,952	
	13-11081	5/11/2013		-5.0%	-5.7%	0.0%	0.0%	-4.9%	-5.1%	-4.6%	\$185,649,934	
	13-15359	9/15/2013		-1.3%	0.0%	0.0%	0.0%	-7.4%	-5.3%	-4.9%	\$166,440,524	
	14-09114	5/1/2014	HB119 1-1-14 Rate Filing	0.1%	1.5%	0.0%	0.0%	-19.2%	-12.8%	-11.6%	\$138,572,893	
			<i>Cumulative pre HB119</i>	-2.0%	32.0%	4.4%	66.4%	62.8%	43.5%	35.5%		
			<i>Cumulative post HB119</i>	-6.8%	3.0%	0.0%	0.0%	-17.3%	-12.3%	-11.8%		
			<i>Cumulative Total</i>	-8.7%	36.0%	4.4%	66.4%	34.5%	25.8%	19.5%		

Comment

Appendix A - Rate Changes - Top 25 Insurers

Filings since: 01/01/11	
Group Code: 241	
<u>Company</u>	<u>NAIC</u>
Metropolitan Casualty Insurance Co.	40169

<u>Company</u>	<u>Filing Number</u>	<u>Effective Date (New)</u>	<u>Category</u>	<u>BI</u>	<u>PD</u>	<u>UM</u>	<u>MP</u>	<u>PIP</u>	<u>Liability (BI+..+PIP)</u>	<u>Overall</u>	<u>Earned Prem</u>	<u>Pending?</u>
Metropolitan Casualty Insurance Co.	10-16284	1/31/2011		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	\$129,072,880	
	11-01143	2/28/2011		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	\$142,649,714	
	11-01547	5/18/2011		6.9%	-1.9%	13.8%	7.9%	11.0%	7.7%	4.7%	\$155,692,196	
	11-09190	12/7/2011		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	\$180,304,225	
	12-02868	8/15/2012		16.1%	5.0%	-5.0%	10.3%	18.3%	9.0%	6.9%	\$204,380,379	
	12-16000	1/1/2013	HB119 10-1-12 Rate Filing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	\$212,428,472	
	13-01404	4/30/2013		1.6%	8.5%	-4.9%	37.0%	4.3%	1.9%	2.4%	\$203,626,952	
	13-14339	1/23/2014		6.7%	13.9%	-4.9%	-0.1%	7.8%	5.0%	5.1%	\$185,649,934	
	13-22778	4/8/2014	HB119 1-1-14 Rate Filing	0.0%	0.0%	0.0%	0.0%	-16.4%	-3.0%	-2.4%	\$166,440,524	
			<i>Cumulative pre HB119</i>	24.1%	3.0%	8.1%	19.0%	31.3%	17.4%	11.9%		
			<i>Cumulative post HB119</i>	8.4%	23.6%	-9.6%	36.9%	-6.0%	3.8%	5.0%		
			<i>Cumulative Total</i>	34.5%	27.3%	-2.2%	62.9%	23.4%	21.8%	17.6%		

Comment

Appendix A - Rate Changes - Top 25 Insurers

Filings since: 01/01/11	
Group Code: 280	
<u>Company</u>	<u>NAIC</u>
Southern-Owners Insurance Company	10190

<u>Company</u>	<u>Filing Number</u>	<u>Effective Date (New)</u>	<u>Category</u>	<u>BI</u>	<u>PD</u>	<u>UM</u>	<u>MP</u>	<u>PIP</u>	<u>Liability (BI+..+PIP)</u>	<u>Overall</u>	<u>Earned Prem</u>	<u>Pending?</u>
Southern-Owners Insurance Company	11-09180	5/24/2011		14.1%	0.5%	8.5%	-0.4%	7.4%	9.1%	6.7%	\$105,316,604	
	11-18652	11/23/2011		6.9%	0.4%	5.0%	7.8%	6.2%	5.5%	3.9%	\$116,106,952	
	12-09163	5/24/2012		2.4%	0.0%	0.0%	3.3%	11.9%	2.9%	2.0%	\$131,845,192	
	12-11620	1/2/2013		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	\$134,690,826	
	12-16047	1/2/2013	HB119 10-1-12 Rate Filing	5.2%	6.7%	0.0%	1.1%	-10.1%	1.9%	2.9%	\$144,636,019	
	13-10285	5/27/2013		5.6%	5.5%	-0.1%	2.5%	3.7%	4.1%	3.1%	\$151,516,908	
	13-20860	11/27/2013	HB119 1-1-14 Rate Filing	7.5%	2.5%	7.5%	1.5%	-6.2%	4.8%	3.1%	\$158,701,422	
	14-15586	8/31/2014		1.2%	-0.3%	6.1%	-1.2%	-0.3%	1.6%	1.0%	\$160,966,551	Yes
			<i>Cumulative pre HB119</i>	24.9%	0.9%	13.9%	10.9%	27.6%	18.5%	13.1%		
			<i>Cumulative post HB119</i>	20.9%	15.0%	13.9%	3.9%	-12.8%	13.0%	10.5%		
			<i>Cumulative Total</i>	50.9%	16.1%	29.8%	15.3%	11.3%	33.8%	24.9%		

Comment

Appendix A - Rate Changes - Top 25 Insurers

Filings since: 01/01/11	
Group Code: 483	
<u>Company</u>	<u>NAIC</u>
Florida Farm Bureau General Ins. Co.	21817

<u>Company</u>	<u>Filing Number</u>	<u>Effective Date (New)</u>	<u>Category</u>	<u>BI</u>	<u>PD</u>	<u>UM</u>	<u>MP</u>	<u>PIP</u>	<u>Liability (BI+..+PIP)</u>	<u>Overall</u>	<u>Earned Prem</u>	<u>Pending?</u>
Florida Farm Bureau General Ins. Co.	10-17052	4/1/2011		19.2%	-0.8%	-15.0%	-10.8%	-1.0%	3.3%	0.4%	\$97,497,098	
	12-05811	11/1/2012	HB119 10-1-12 Rate Filing	2.0%	3.9%	4.0%	4.0%	8.0%	3.7%	1.4%	\$105,203,836	
	13-21168	6/1/2014	HB119 1-1-14 Rate Filing	10.9%	-0.1%	10.9%	7.9%	-0.1%	6.8%	4.9%	\$113,472,552	
			Cumulative pre HB119	19.2%	-0.8%	-15.0%	-10.8%	-1.0%	3.3%	0.4%		
			Cumulative post HB119	13.1%	3.8%	15.3%	12.2%	7.9%	10.8%	6.4%		
			Cumulative Total	34.8%	3.0%	-2.0%	0.1%	6.8%	14.5%	6.8%		

Comment

Appendix A - Rate Changes - Top 25 Insurers

Filings since: 01/01/11	
Group Code: -	
<u>Company</u>	<u>NAIC</u>
Windhaven Insurance Company	12541

<u>Company</u>	<u>Filing Number</u>	<u>Effective Date (New)</u>	<u>Category</u>	<u>BI</u>	<u>PD</u>	<u>UM</u>	<u>MP</u>	<u>PIP</u>	<u>Liability (BI+..+PIP)</u>	<u>Overall</u>	<u>Earned Prem</u>	<u>Pending?</u>
Windhaven Insurance Company	11-01339	2/1/2011		20.0%	1.3%	0.0%	0.0%	20.0%	14.9%	13.3%	\$15,224,087	
(PPA Program)	11-07249	8/1/2011		29.0%	-1.2%	0.0%	0.0%	30.2%	22.4%	19.8%	\$26,224,825	
	11-19775	12/1/2011		1.2%	1.1%	25.0%	0.0%	5.1%	3.5%	1.9%	\$38,951,248	
	12-09612	5/27/2012		20.0%	9.0%	0.0%	0.0%	12.0%	13.1%	11.8%	\$50,105,515	
	12-16065	1/15/2013	HB119 10-1-12 Rate Filing	15.0%	5.0%	9.0%	0.0%	8.0%	9.0%	7.3%	\$67,463,709	
	13-00577	1/15/2013		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	\$67,463,449	
	13-21830	1/15/2014	HB119 1-1-14 Rate Filing	8.0%	8.5%	20.7%	0.0%	-8.1%	-2.0%	-3.2%	\$124,191,332	
			Cumulative pre HB119	88.0%	10.3%	25.0%	0.0%	83.9%	64.8%	54.6%		
			Cumulative post HB119	24.2%	13.9%	31.6%	0.0%	-0.7%	6.9%	3.9%		
			Cumulative Total	133.5%	25.7%	64.5%	0.0%	82.5%	76.1%	60.6%		
(Optimum Program)	13-22594	1/10/2014	HB119 1-1-14 Rate Filing	9.9%	-2.5%	-5.0%		-25.3%	-13.2%	-10.6%	\$2,974,596	
	14-10041	5/19/2014		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	\$2,974,595	
			Cumulative pre HB119	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
			Cumulative post HB119	9.9%	-2.5%	-5.0%	0.0%	-25.3%	-13.2%	-10.6%		
			Cumulative Total	9.9%	-2.5%	-5.0%	0.0%	-25.3%	-13.2%	-10.6%		
(Select Program)	12-16109	1/1/2013	HB119 10-1-12 Rate Filing	-	0.0%	-	-	0.0%	0.0%	0.0%	\$0	
	13-03893	5/1/2013		-	7.0%	-	-	-16.5%	-11.2%	-10.7%	\$14,062,824	
	13-22037	1/15/2014	HB119 1-1-14 Rate Filing	-	-3.0%	-	-	-6.5%	-5.6%	5.4%	\$22,741,700	
			Cumulative pre HB119	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
			Cumulative post HB119	-	3.8%	-	-	-21.9%	-16.1%	-5.9%		
			Cumulative Total	-	3.8%	-	-	-21.9%	-16.1%	-5.9%		

Weighted Average							
Cumulative pre HB119	69.1%	8.1%	19.6%	0.0%	65.9%	50.8%	42.9%
Cumulative post HB119	19.4%	11.5%	24.6%	0.0%	-5.4%	2.1%	1.6%
Cumulative Total	105.2%	20.7%	50.4%	0.0%	59.9%	56.4%	46.1%

Comment



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