

MAINE STATE LEGISLATURE

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The State of Competition in the Maine Workers' Compensation Market

Pursuant to M.R.S.A. 24-A Section 2383-A this report reviews the state of competition in the workers' compensation market in Maine.

Maine Bureau of Insurance

1) Workers' Compensation Market Competition: Voluntary Market 1988 - 1992.

Prior to the 1992 Blue Ribbon Commission Reform legislation, insurance carriers were writing very few risks in the voluntary market (those employers which were voluntarily underwritten by insurers) and the vast majority of all insured employers were written in what was known as the "assigned risk pool in the residual market" or the "Pool". The Pool operated for the years 1988 through 1992.

On a calendar year basis, the percentage of premium written in the voluntary market for the years 1988 through 1992 was:

Year	Voluntary Market Share	Residual Market Share
1988	17.7%	82.3%
1989	9.4%	90.6%
1990	12.2%	87.8%
1991	21.8%	78.2%
1992	17.4%	82.6%

**Data Source: National Council on Compensation Insurance (NCCI)
1992 Management Summary**

During this period, insured employers in Maine had few options to obtain workers' compensation other than to self-insure or to be assigned to a servicing carrier. In response to these conditions, the 1992 Blue Ribbon Commission Reform legislation, Public Law 885 "An Act to Reform the Workers' Compensation Act and Workers' Compensation Insurance Laws" was enacted establishing the Maine Employers' Mutual Insurance Company and an open competitive rating environment.

During the same period, the Pool incurred deficits which continue to affect the workers' compensation insurance market to this day. Although recent deficit estimates are significantly lower than those projected a few years ago, Public Law 289 "An Act to Create the Workers' Compensation Residual Market Deficit Resolution and Recovery Act", approved by the Governor on June 23, 1995, provides a mechanism to fund this deficit and required certain insurance carriers to contribute \$65 million dollars by January 1, 1996. It also fixed the employers' share of the deficit and reduced the surcharge on insurance policies to 6.32 percent of workers' compensation premium. This law has added stability to the workers' compensation marketplace. Recent deficit estimates project that the funding provided by PL 289 will yield a surplus after all claims are paid.

Maine Employers Mutual Insurance Company was established as an employer-owned mutual insurance company and replaced the Pool beginning January 1, 1993. Although Maine

Employers' Mutual is the only workers' compensation insurance company in Maine which is required to accept all risks that apply (there are a few circumstances in which they can deny coverage), they do not view themselves solely as a market of last resort and have manifested a commitment to provide a superior level of service which is answerable to the owners of the company, their policyholders-the employers of Maine. In 1997, Maine Employers' Mutual reduced their rates an average of 10.2%. This reduction was preceded by an average 8.2% rate reduction in 1996 and the elimination of their capital contribution. The 1997 rate reduction marks their fourth consecutive rate reduction.

As a result of the 1992 Blue Ribbon Commission Reform legislation, the National Council on Compensation Insurance (NCCI) is no longer allowed to file full rates for workers' compensation in Maine. (NCCI is a rating organization which files advisory loss cost rates and rating plans on behalf of member insurers and as of 1993, NCCI could only file loss cost rates.) Each insurer writing workers' compensation in Maine is required to file their own rates utilizing their own expense and profit provisions.

2) Recent Experience in the Maine Workers' Compensation Market:

The experience of insurers writing workers' compensation policies has improved significantly in recent years as measured by industry-wide loss ratios. The 1995 calendar year loss ratio of .57 represented a 25% decrease from the 1994 level of .82 and a 70% decrease from the 1991 level of 1.87. The loss ratio rose slightly in 1996 to .67 but still is the second lowest loss ratio in over 20 years. Cumulatively these loss ratios are a sign of the tremendous improvement in the Maine workers' compensation insurance market.

Calendar Year Loss Ratios in Maine, 1988 - 1996:

Year	Loss Ratio
1988	1.44
1989	1.54
1990	1.44
1991	1.87
1992	.99
1993	.80
1994	.82
1995	.57
1996	.67

Source: Annual Statement Page 14 Compilations

**3) Market Shares and Market Activity By Insurance Co.(Group):
Calendar Year 1996 Market Share Based on Written Premium:**

Company	Market Share
Maine Employers' Mutual Insurance Company	56.0
Acadia Insurance Company	9.4
Hanover of Maine Insurance Companies	9.3
Commercial Union Insurance Companies	5.8
Maine Bonding Companies	4.0
Redland Insurance Company	2.4
The Netherlands Insurance Companies	2.3
Liberty Mutual Insurance Companies	2.0
Nationwide Companies	1.3
Royal Insurance Companies	1.1

As additional carriers continue to reenter the market resulting in more options for Maine employers, we expect that market shares in 1997 will look markedly different from the 1996 numbers.

4) Rate Differentials:

Prior to the 1992 Blue Commission Reform legislation all insurance companies charged the same base rates (manual rates) for workers' compensation insurance. Although each employer's actual premium was modified by their own experience, there was little or no differentiation in the manual rates. Since 1/1/93, each insurance company is required to file its own manual rates based upon its expense and profit provisions. (NCCI continues to annually make an advisory filing of pure premium rates, which are rates for losses and loss adjustment expenses, excluding all other expenses and profit provisions.) The NCCI has filed for an average rate reduction of 10.6% effective January 1, 1998. In 1997 the NCCI loss cost filing called for an overall rate reduction of 12.5% effective January 1, 1997. The 1996 NCCI loss cost filing had an overall rate reduction of 10.9%. This followed an average decrease of 12.5% in 1995 and a 3.8% decrease occurring in 1994. Overall, since 1994 the cumulative impact of these rate reductions, including the recommended 1998 reduction, is a 41% decrease in loss cost rates.

As of November 1997 one-hundred thirty-one insurance carriers have filed and received approval from the Bureau to sell workers' compensation insurance in Maine at specified rates. At this time, data is not available regarding the amount of business each of these companies is writing in Maine. However, the attached charts show the high and low rates for the 140 largest classification codes (in terms of payroll) for all workers' compensation insurers and compares the high and low rates to the standard rate which Maine Employers' Mutual Insurance charges for that classification code. (These rates do not reflect the proposed 1998 rate reduction.) For many classification codes, the wide range underscores the new competitive nature of workers' compensation insurance in Maine and underscores the importance of employers exploring options in securing coverage for workers' compensation claims.

Competitive rating has allowed for "niche" marketing. A company with expertise in certain areas can utilize that proficiency to lower the rate for specific risks and return an acceptable profit to the carrier. For example, some insurers reentering the Maine market specialize in underwriting employers in a specific industry such as wood products manufacturing (including logging), health care, or construction.

5) Tiered Rating, Schedule Rating, Dividend Plans, Retrospective Rating, and Large Deductibles:

Another feature of the new workers' compensation insurance market in Maine is the introduction of tiered rating, scheduled rating, dividend plans and the increased use of retrospective rating and large deductibles.

Tiered rating provides a means for an individual carrier to offer more than one set of base rates. The carrier develops the underwriting criteria applicable to each tier and files the criteria and rates which are then reviewed to assure that they are not unfairly discriminatory.

Nearly 70 percent of the insurance companies with filed rates have received approval to utilize scheduled rating in Maine. Scheduled rating allows the insurance company to consider other factors that may not be reflected in an employer's experience rating when determining an individual employer's premium. Elements such as safety plans, medical facilities, safety devices, and premises are considered and can result in a change in premium by as much as twenty-five percent.

Indications are that retrospective rating plans are being widely utilized in Maine. Retrospective rating is a means by which an employer's final premium is a direct function of the loss experience for that policy period. To the extent the employer controls its losses it receives a reduced premium and, conversely, pays a higher premium in the event it has poor experience. Retrospective rating utilizes minimum and maximum amounts for a policy and is typically written for large employers.

Finally, several companies offer large deductible plans in Maine where by the employer agrees to pay a deductible that can be in excess of \$100,000 per claim. The insurance company is required by law to pay all losses associated with this policy and then bills the deductible amounts to the insured employer. The advantages of this product are that the employer gets a discount for assuming some of the risk and it offers an alternative to self-insurance.

6) Insurers Entering the Maine Workers' Compensation Market:

Since the Blue Ribbon Commission Reform legislation was enacted in October of 1992, a large number of insurance companies have reentered the Maine workers' compensation market. During that time frame, exits from the workers' compensation market have been minimal. One of the nation's largest workers' compensation insurers, Liberty Mutual returned to the market in 1995 and one of Maine's domestic insurers, Mutual Fire of Saco was purchased and renamed

Eastguard with the specific intent of entering the Maine workers' compensation market. Other insurers recently reentering the Maine workers' compensation market include ITT Hartford, Aetna, Travelers, and CIGNA. Since 1996 fifty-eight companies have obtained authority to write workers' compensation coverage.

7) Self-Insurance:

Self-insurance represents a significant part of the workers' compensation market in Maine and is a viable alternative for many employers in the State. Since 1988, nineteen new self-insured groups have been formed in Maine bringing the total number of groups to twenty-one. These twenty-one groups represent approximately 1350 employers. Additionally, there are approximately 150 individual self-insured employers in Maine of which about 75 have become self-insured since 1988. Since 1985 the self-insurers' estimated standard premium has grown from more than \$52 million to about 170 million dollars. It is estimated that self-insureds now represent approximately 52% of the workers' compensation market in Maine in terms of annual standard premium. The growth in self-insurance has slowed dramatically in the last few years and some former self-insured employers have returned to the commercial market. The competitive market could cause further returns from self-insurance to the commercial insurance market and some carriers have filed rating plans to allow them to assume the balance of a self-insurer's existing exposure and transition into a fully insured program.

8) Conclusion

When contrasted with the conditions which existed during the years 1988 through 1992, the competition in the Maine workers' compensation market has clearly improved and many Maine employers have more options. However, according to economic theory, an industry is perfectly competitive only when a large number of firms selling a homogeneous commodity is so large, and each individual firm's share of the market is so small, that no individual firm is able to affect the price of the commodity. By this definition, Maine does not yet have a competitive market. However, when one considers the range among workers' compensation rates, the number of carriers in the market place, and the overall decline in rate levels since 1994, Maine's workers' compensation market is healthier, many employers have greater options and lower costs, and market competition has significantly improved.

Workers' Compensation Rates for Selected Carriers as of 11-1-97

CODE	DESCRIPTION	LOW	MEMIC(std)	HIGH
34	FARM: POULTRY/EGG	\$6.67	\$12.33	\$13.66
42	LANDSCAPE GARDENING	\$4.41	\$8.16	\$9.04
1463	ASPHALT WORKS	\$5.42	\$10.02	\$11.10
2003	BAKERY	\$3.04	\$5.61	\$6.22
2070	CREAMERY	\$3.72	\$6.89	\$7.63
2111	CANNERY	\$3.42	\$6.33	\$7.01
2113	CANNERY SARDINES	\$4.13	\$7.64	\$8.46
2157	BOTTLING	\$2.98	\$5.52	\$6.11
2220	YARN OR THREAD MFG	\$4.02	\$7.43	\$8.23
2286	WOOL SPINNING/WEAVING	\$3.20	\$5.92	\$6.56
2302	SILK THREAD/YARN MFG	\$2.30	\$4.26	\$4.71
2380	WEBBING MFG	\$1.98	\$3.65	\$4.05
2501	CLOTHING MFG	\$2.17	\$4.02	\$4.45
2585	LAUNDRY	\$4.85	\$8.97	\$9.94
2623	TANNING	\$4.42	\$8.18	\$9.05
2660	BOOT OR SHOE MFG	\$4.65	\$8.60	\$9.52
2688	LEATHER GOODS MFG	\$3.11	\$5.75	\$6.37
2702	LOGGING OR LUMBERING	\$24.12	\$44.60	\$49.38
2709	LOG. OR LUM. MECHANIZED	\$6.94	\$12.84	\$14.21
2710	SAW MILL	\$7.02	\$12.99	\$14.38
2721	LOG. OR LUM.CERTIFIED	\$11.47	\$21.21	\$23.48
2731	PLANING/MOLDING MILL	\$3.49	\$6.45	\$7.15
2802	CARPENTRY SHOP ONLY	\$4.67	\$8.64	\$9.56
2812	CABINET WORK	\$3.06	\$5.66	\$6.26
2841	WOODENWARE MFG	\$3.38	\$6.24	\$6.91
2883	FURNITURE MFG WOOD	\$3.49	\$6.45	\$7.15
3030	IRON OR STEEL FABRICATION SHOP	\$5.46	\$10.09	\$11.18
3076	FIREPROOF EQUIPMENT MFG	\$1.74	\$3.22	\$3.57
3113	TOOL MFG NOT DROP/MAC	\$1.92	\$3.56	\$3.94
3179	ELECTRICAL APPARATUS MFG	\$3.26	\$6.02	\$6.67
3507	CONSTRUCTION/AGRI MACHINE MFG	\$2.88	\$5.33	\$5.91
3574	COMPUTING/RECORDING MACHINE MFG	\$2.12	\$3.92	\$4.34
3629	PRECISION PARTS MFG	\$1.48	\$2.74	\$3.04
3632	MACHINE SHOP	\$2.50	\$4.62	\$5.12
3634	VALVE MFG	\$2.01	\$3.71	\$4.11
3643	ELECTRIC POWER/TRANS EQUIP MFG	\$2.08	\$3.85	\$4.26
3681	TELEVISION/RADIO/TELEPHONE MFG	\$1.52	\$2.81	\$3.12
3724	MACHINERY/EQUIPMENT ERECTION	\$11.49	\$21.25	\$23.53
3726	BOILER INSTALLATION/REPAIR-STEAM	\$12.87	\$23.80	\$26.35
3826	AIRCRAFT ENGINE MFG	\$1.20	\$2.23	\$2.46
4000	SAND DIGGING	\$4.45	\$8.23	\$9.11
4034	CONCRETE PRODUCTS MFG	\$6.06	\$11.21	\$12.42
4112	INCANDESCENT LAMP MFG	\$1.05	\$1.95	\$2.15
4207	PULP MFG CHEMICAL PROCESS	\$0.86	\$1.60	\$1.77
4239	PAPER MFG	\$3.51	\$6.50	\$7.19
4279	PAPER GOODS MFG	\$2.74	\$5.07	\$5.61
4299	PRINTING	\$1.77	\$3.28	\$3.63
4304	NEWSPAPER PUBLISHING	\$2.63	\$4.87	\$5.39
4361	PHOTOGRAPHERS	\$1.94	\$3.58	\$3.97
4431	PHONOGRAPH RECORD MFG	\$3.01	\$5.57	\$6.17

Workers' Compensation Rates for Selected Carriers as of 11-1-97

4484	PLASTIC MFG: MOLDED	\$3.02	\$5.59	\$6.18
4511	ANALYTICAL CHEMIST	\$1.55	\$2.87	\$3.18
4693	PHARM/SURGICAL MFG	\$1.20	\$2.23	\$2.46
5022	MASONRY	\$15.22	\$28.14	\$31.16
5183	PLUMBING	\$5.43	\$10.04	\$11.11
5190	ELECTRICAL WIRING WITHIN BUILDING	\$2.85	\$5.28	\$5.84
5191	OFFICE MACHINE REPAIR	\$0.59	\$1.09	\$1.21
5192	VENDING MACHINE SERVICE AND SALES	\$4.05	\$7.49	\$8.29
5213	CONCRETE CONSTRUCTION	\$14.84	\$27.44	\$30.38
5215	CONCRETE WORK PRIVATE RESIDENCE	\$7.36	\$13.61	\$15.07
5221	CONCRETE WORK	\$4.33	\$8.01	\$8.87
5403	CARPENTRY NOC	\$19.95	\$36.90	\$40.86
5437	CARPENTRY INSTALL CABINETS AND TRIM	\$5.88	\$10.88	\$12.04
5445	WALLBOARD INSTALLATION	\$11.10	\$20.52	\$22.72
5474	PAINTING/PAPERHANGING	\$9.49	\$17.54	\$19.42
5479	INSULATION WORK	\$5.00	\$9.25	\$10.25
5506	STREET OR ROAD CONSTRUCTION PAVING	\$6.47	\$11.97	\$13.25
5507	STREET/ROAD CONSTRUCTION SUBGRADE	\$7.50	\$13.87	\$15.36
5538	SHEET METAL WORK	\$5.43	\$10.04	\$11.11
5551	ROOFING ALL KINDS	\$17.89	\$33.08	\$36.63
5606	CONTRACTOR EXECUTIVE	\$2.16	\$3.99	\$4.42
5645	CARPENTRY ONE/TWO FAMILY DWELLING	\$5.33	\$9.86	\$10.91
5651	CARPENTRY 3 STORIES OR LESS	\$7.30	\$13.50	\$14.94
6217	EXCAVATION	\$6.61	\$12.22	\$13.53
6306	SEWER CONSTRUCTION	\$5.56	\$10.28	\$11.38
7219	TRUCKING: NOC	\$9.49	\$17.54	\$19.42
7380	DRIVERS AND CHAUFFEURS	\$4.59	\$8.48	\$9.39
7382	BUS COMPANY	\$3.94	\$7.29	\$8.08
7390	BEER OR ALE DEALERS	\$3.29	\$6.09	\$6.74
7403	AIRCRAFT OPER REG SCH CARRIERS	\$1.83	\$3.39	\$3.75
7423	AIRCRAFT OPERATIONS ALL OTHERS	\$3.35	\$6.19	\$6.85
7520	WATERWORKS OPERATION	\$2.47	\$4.56	\$5.05
7539	ELECTRIC LIGHT OR POWER	\$2.88	\$5.33	\$5.91
7600	TELEPHONE ALL OTHERS	\$2.91	\$5.39	\$5.97
7610	RADIO OR TV BROADCASTING	\$0.40	\$0.74	\$0.82
7720	POLICE OFFICERS	\$2.82	\$5.21	\$5.77
7723	PRIVATE DETECTIVE OR PATROL AGENCY	\$3.15	\$5.82	\$6.45
8001	STORE: FLORISTS	\$1.49	\$2.76	\$3.05
8006	STORE: GROCERY RETAIL	\$1.57	\$2.90	\$3.21
8008	STORE: CLOTHING RETAIL	\$1.02	\$1.89	\$2.09
8010	STORE: HARDWARE RETAIL	\$1.35	\$2.49	\$2.76
8013	STORE: JEWELRY	\$0.53	\$0.98	\$1.09
8017	STORE: RETAIL NOC	\$1.07	\$1.97	\$2.19
8018	STORE: WHOLESALE NOC	\$4.36	\$8.06	\$8.93
8021	STORE: MEAT WHOLESALE	\$5.44	\$10.05	\$11.13
8024	SEAFOOD DEALER	\$4.81	\$8.90	\$9.86
8032	STORE: CLOTHING WHOLESALE	\$1.63	\$3.01	\$3.33
8033	STORE: PROVISIONS COMBINED	\$1.73	\$3.21	\$3.55
8039	STORE: DEPARTMENT RETAIL	\$1.97	\$3.64	\$4.03
8044	STORE: FURNITURE	\$2.54	\$4.69	\$5.19
8046	STORE AUTO PARTS NEW RETAIL	\$1.45	\$2.67	\$2.96

Workers' Compensation Rates for Selected Carriers as of 11-1-97

8058	BUILDING MATERIALS DEALER	\$1.66	\$3.07	\$3.39
8107	MACHINERY DEALER	\$2.79	\$5.15	\$5.70
8111	PLUMBERS SUPPLIES	\$2.68	\$4.96	\$5.49
8227	CONSTRUCTION OR ERECTION YARD	\$3.38	\$6.26	\$6.93
8232	LUMBERYARD NEW MATERIALS	\$2.74	\$5.07	\$5.61
8235	SASH,DOOR AND MILLWORK DEALER	\$3.07	\$5.67	\$6.28
8350	GASOLINE DEALERS	\$3.43	\$6.34	\$7.02
8380	AUTOMOBILE SERVICE CENTER	\$2.75	\$5.08	\$5.63
8385	BUS COMPANY GARAGE EMPLOYEES	\$2.01	\$3.72	\$4.12
8393	AUTO BODY REPAIR	\$2.40	\$4.44	\$4.91
8601	ARCHITECT OR ENGINEER CONSULTING	\$0.64	\$1.19	\$1.32
8720	INSPECTION OF RISKS FOR INSURANCE	\$0.99	\$1.83	\$2.03
8742	SALESPERSON/OUTSIDE MESSENGER	\$0.64	\$1.18	\$1.30
8748	AUTOMOBILE SALESPERSON	\$1.09	\$2.02	\$2.23
8755	LABOR UNION	\$0.74	\$1.37	\$1.52
8803	AUDITORS TRAVELING	\$0.20	\$0.38	\$0.42
8810	CLERICAL/OFFICE EMPLOYEE NOC	\$0.48	\$0.90	\$0.99
8820	ATTORNEY ALL EMPLOYEES	\$0.62	\$1.15	\$1.27
8829	CONVALESCENT OR NURSING HOME	\$4.28	\$7.92	\$8.77
8831	HOSPITAL VETERINARY	\$0.87	\$1.61	\$1.78
8832	PHYSICIAN AND CLERICAL	\$0.48	\$0.90	\$0.99
8833	HOSPITAL PROFESSIONAL EMPLOYEE	\$1.13	\$2.09	\$2.31
8835	NURSING- HOME HEALTH	\$2.49	\$4.61	\$5.10
8868	COLLEGE PROFESSIONAL & CLERICAL	\$0.34	\$0.63	\$0.70
8901	TELEPHONE OFFICE AND CLERICAL	\$0.27	\$0.50	\$0.56
9014	BUILDING OPERATIONS BY CONTRACTOR	\$3.39	\$6.27	\$6.94
9015	BUILDING OPERATIONS BY OWNER	\$3.04	\$5.61	\$6.22
9016	AMUSEMENT PARK	\$1.88	\$3.49	\$3.86
9033	HOUSING AUTHORITY	\$1.66	\$3.07	\$3.39
9040	HOSPITAL ALL OTHER EMPLOYEES	\$2.70	\$5.00	\$5.53
9052	HOTEL ALL OTHER EMPLOYEES	\$2.22	\$4.10	\$4.54
9058	HOTEL: RESTAURANT EMPLOYEES	\$1.72	\$3.18	\$3.52
9060	COUNTRY CLUB	\$1.63	\$3.01	\$3.33
9061	CLUB NOC AND CLERICAL	\$1.55	\$2.87	\$3.18
9063	YMCA,YWCA	\$0.83	\$1.53	\$1.69
9079	RESTAURANT NOC	\$1.69	\$3.12	\$3.46
9101	COLLEGE: ALL OTHER EMPLOYEES	\$2.59	\$4.79	\$5.30
9180	AMUSEMENT DEVICE NOT TRAVELING	\$6.59	\$12.19	\$13.50
9402	STREET CLEANING	\$4.66	\$8.62	\$9.55
9403	GARBAGE COLLECTION	\$5.08	\$9.39	\$10.40
9410	MUNICIPAL	\$2.15	\$3.98	\$4.40
9519	HOUSEHOLD APPLIANCE REPAIR ELECTRIC	\$1.64	\$3.02	\$3.35
9521	HOUSE FURNISHINGS INSTALLATION	\$4.32	\$7.99	\$8.85
9586	BARBER SHOP	\$0.80	\$1.48	\$1.64
9620	FUNERAL DIRECTOR	\$0.75	\$1.39	\$1.53

Companies with Approved Workers' Compensation Rates

Revised December 10, 1997

Acadia Insurance Company
One Acadia Commons
PO Box 9010
Westbrook, ME 04098-5010

Aetna Casualty and Surety Company
151 Farmington Avenue
Hartford, CT. 06156

Aetna Casualty and Surety Company of
Illinois
151 Farmington Avenue
Hartford, CT. 06156

Allianz
6435 Wilshire Blvd.
P.O. Box 54897
Los Angeles, CA 90054

American and Foreign Insurance
2 Commerce Drive
Bedford, NH 03110

American Automobile Insurance Co.
777 San Marin Drive
Novato, CA 94998

American Casualty Co. of Reading, PA
CNA Plaza
Chicago, IL 60685

American Central Ins. Co.
One Beacon Street
Boston, MA 02108-3100

American Employers Ins. Co.
One Beacon Street
Boston, MA 02108-3100

American Insurance Co.
777 San Marin Drive
Novato, CA 94998

American Interstate Ins. Co.
1807 Highway 190 WEST
Deridder, LA 70634-6005

American Manufacturers Mut. Ins. Co.

One Kemper Drive
Long Grove, IL 60049-0001

American Motorists Ins. Co.
One Kemper Drive
Long Grove, IL 60049-0001

American Protection Ins. Co.
One Kemper Drive
Long Grove, IL 60049-0001

American Zurich Insurance Co.
1400 American Lane
Schaumburg, IL. 60196-1050

Arrow Mutual Liability Ins. Co.
23 Commonwealth Ave.
Chestnut Hill, MA 02167-1099

Associated Indemnity Corporation
777 San Marin Drive
Novato, CA 94998

Assurance Company of America
PO Box 1228
Baltimore, MD 21203-1228

Atlantic Insurance Company
PO Box 1771
Dallas, TX 75221-1771

Atlantic Mutual Insurance Company
Three Giralda Farms
Madison, NJ 07940-1004

Bituminous Insurance Companies
320 18th Street
Rock Island, IL 61201-8744

Business Insurance Company
11092 Sun Center Drive
Rancho Cordova, CA 95670

Camden Fire Ins. Association
436 Walnut Street
Philadelphia, PA 19105

Centennial Insurance Company
Three Giralda Farms

Madison, NJ 07940-1004

Charter Oak Fire Ins. Co.
One Tower Square
Hartford, CT 06183

Chrysler Insurance
PO Box 5158
Southfield, MI 48086-5168

Chubb Indemnity Insurance Co.
PO Box 1615
Warren, NJ 07061-1615

Cigna Fire Insurance Co.
1601 Chestnut Street
Philadelphia, PA 19192-2305

Cigna Insurance Co.
1601 Chestnut Street
Philadelphia, PA 19192-2305

Cigna Property and Casualty Insurance Co.
1601 Chestnut Street
Philadelphia, PA 19192-2305

Citizens Insurance Company
8 Ashley Drive
PO Box 9001
Scarborough, Maine 04070-5001

Clarendon National Ins. Co.
1177 Avenue of the Americas
New York, NY 10036

Commercial Union Insurance Company
One Beacon Street
Boston, MA 02108-3100

Connecticut Indemnity Company
9 Farm Springs Drive
Farmington, CT 06032

Continental Casualty Company
CNA Plaza
Chicago, IL 60685

Eastguard Insurance Company
PO Box 537
Saco, ME 04074

Employers' Fire Insurance Company
One Beacon Street
Boston, MA 02108-3100

Employers Insurance of Wausau
2000 Westwood Drive
Wausau, WI 54401

Excelsior Ins. Co.
62 Maple Ave.
Keene, NH 03431

Fairfield Insurance Company
PO Box 10167
Stamford, CT 06904-2167

Farmington Casualty Company
151 Farmington Avenue
Hartford, CT. 06156

Fire and Casualty Ins. Co. of Connecticut
9 Farm Springs Drive
Farmington, CT 06032

Fireman's Fund Ins. Co.
777 San Marin Drive
Novato, CA 94998

First Liberty Insurance Corp.
PO Box 140
175 Berkeley Street
Boston, MA 02117-0140

Frontier Insurance Company
Rock Hill
New York, NY 12775-8000

GAN National Insurance Company
120 Wall Street
New York, NY 10005

General Accident
436 Walnut Street
Philadelphia, PA 19106-3786

General Insurance Company of America
Safeco Plaza
Seattle, WA 98185

Genesis Insurance Company
Financial Centre
PO Box 10352
Stamford, CT 06904-2352

Globe Indemnity Company
9300 Arrowpoint Boulevard
PO Box 1000
Charlotte, NC 28201-1000

Great West Casualty Company
PO Box 277
South Sioux City, NE 68776-0277

Gulf Insurance Group
P.O. Box 1771
Dallas, TX 75221-1771

Harco National Insurance Company
PO Box 68309
Schaumburg, IL 60168-0309

Hanover Insurance Company
8 Ashley Drive
P.O. Box 9001

Scarborough, ME 04070-5001

Hartford Accident and Indemnity Company
Hartford Plaza
Hartford, CT 06115

Hartford Casualty Insurance Company
Hartford Plaza
Hartford, CT 06115

Hartford Fire Ins. Co.
Hartford Plaza
Hartford, CT 06115

Hartford Ins. Co. of the Midwest
Hartford Plaza
Hartford, CT 06115

Hartford Underwriters Ins. Co.
Hartford Plaza
Hartford, CT 06115

Highlands Insurance Group
10370 Richmond Avenue
Houston, TX 77042-4123

Indemnity Insurance Co. of North America
1601 Chestnut Street
Philadelphia, PA 19192-2305

Industrial Indemnity
PO Box 7468
San Francisco, CA 94120

Insurance Company of North America
1601 Chestnut Street
Philadelphia, PA 19192-2305

Intercargo Insurance Company
1450 East American Lane 20th Floor
Schaumburg, IL 60173

International Business & Mercantile
Reassurance Company
PO Box 789
Greensburg, PA 15601

John Deere Insurance Corp.
3400 80th Street
Moline, IL 61265-5886

Legion Insurance Company
111 E. Kilbourn Avenue
Suite 1150
P.O. Box 92903
Milwaukee, WI 53202-0903

Liberty Insurance Corp.
PO Box 140 175 Berkeley Street
Boston, MA 02117-0140

Liberty Mutual Insurance Company

PO Box 140 175 Berkely Street
Boston, MA 02117-0140

Liberty Mutual Fire Ins. Co.
PO Box 140 175 Berkeley Street
Boston, MA 02117-0140

LM Insurance Corp.
PO Box 140 175 Berkeley Street
Boston, MA 02117-0140

Lumber Mutual Insurance Co.
PO Box 9165
Framingham, MA 01701-9165

Lumbermens Mutual Casualty Co.
One Kemper Drive
Long Grove, IL 60049-0001

Lumbermen's Underwriting Alliance
2501 N. Military Trail
Boca Raton, FL 33431-6398

Maine Bonding & Casualty Co.
PO Box 448
Portland, ME 04104

Maine Employers Mutual Ins. Company
261 Commercial Street
P.O. Box 11409
Portland, ME 04104

Markel Insurance Company
Shand Morahan Plaza
Evanston, IL 60201

Maryland Insurance Company
P.O. Box 1228
Baltimore, MD 21203

Massachusetts Bay Ins. Co.
8 Ashley Drive
PO Box 9001
Scarborough, ME 04070-5001

Merchants Insurance
250 Main Street
Buffalo, NY 14202

National Fire Ins. Co. of Hartford, CT
CNA Plaza
Chicago, IL 60685

National Grange
55 West Street
PO Box 2300
Keene, NH 03431-8000

National Surety Corporation
777 San Marin Drive
Novato, CA 94998

Netherlands Ins. Company
62 Maple Avenue
Keene, NH 03431

North River Insurance Company
PO Box 1973
Morristown, NJ 07960

Northern Assurance Co. of America
One Beacon Street
Boston, MA 02106

Northern Ins. Co. of N.Y.
PO Box 1228
Baltimore, MD 21203-1228

Old Republic Companies
P.O. Box 789
Greenburg, PA 15601

Pacific Employers Insurance Co.
1601 Chestnut Street
Philadelphia, PA 19192-2305

Peerless Ins. Co.
62 Maple Ave.
Keene, NH 03431

Pennsylvania National Mutual Casualty
Ins. Company
PO Box 2361
Harrisburg, PA 17105

Petroleum Casualty Company
P.O. Box 3342
Houston, TX 77253-3342

Preferred Risk Mutual Ins. Co.
111 Ashworth Road
West Des Moines, IA 50265-3538

Protective Insurance Company
1099 North Mendin Street
Indianapolis, IN 46204

Public Service Mutual Ins. Co.
132 West 31st. Street
New York, NY 10001-3406

Redland Insurance Company
535 West Broadway
P.O. Box 229
Council Bluffs, IA 51502-0029

Reliance Insurance Company
4 Penn Center Plaza
Philadelphia, PA 19103

Reliance National Indemnity Company
4 Penn Center Plaza
Philadelphia, PA 19103

Reliance National Insurance Company
4 Penn Center Plaza
Philadelphia, PA 19103

Royal Indemnity Company
PO Box 10000
Charlotte, NC 28201-1000

Royal Insurance Co. of America
9300 Arrowpoint Boulevard
P.O. Box 1000
Charlotte, NC 28201-1000

SAFECO Insurance Company of America
Safeco Plaza
Seattle, WA 98185

Safeguard Insurance Company
2 Commerce Drive
Bedford, NH 03110

St. Paul Fire & Marine Ins. Co.
385 Washington Street
St. Paul, MN 55102-1390

St. Paul Guardian Ins. Co.
385 Washington Street
St. Paul, MN 55102-1390

St. Paul Mercury Ins. Co.
385 Washington Street
St. Paul, MN 55102-1390

Savers Property and Casualty
10985 Cody, Suite 135
Overland Park, KS 66210

Seaco Insurance Company
PO Box 9165
Farmingham, MA 01701-9165

Security Ins. Co. of Hartford
9 Farm Springs Drive
Farmington, CT 06032

Seven Hills Insurance Company
580 Walnut Street
Cincinnati, OH 45202

Tokio Fire & Marine
101 Park Avenue
New York, NY 10178-0095

Transcontinental Insurance Co.
CNA Plaza
Chicago, IL 60685

Transportation Insurance Co.
CNA Plaza
Chicago, IL 60685

Travelers Indemnity Co. of America

One Tower Square
Hartford, CT 06183

Travelers Indemnity Co. of Illinois
One Tower Square
Hartford, CT 06183

Travelers Insurance Ins. Co.
One Tower Square
Hartford, CT 06183

Truck Insurance Exchange
4680 Wilshire Blvd.
P.O. Box 2478
Los Angeles, CA 90051

Twin City Insurance Co.
Hartford Plaza
Hartford, CT 06115

United Pacific Insurance Company
4 Penn Center Plaza
Philadelphia, PA 19103

United States Fire Insurance Company
PO Box 1973
Morristown, NJ 07960

Universal Underwriters Insurance Company
6363 College Boulevard
Overland Park, KS 66211

Valiant Ins. Company
PO Box 1228
Baltimore, MD 21203

Valley Forge Insurance Co.
CNA Plaza
Chicago, IL 60685

VanLiner Insurance Company
One United Drive
P.O. Box 26352
Fenton, MO 63026-1552

Virginia Surety Company
123 North Wacker Drive
Chicago, IL 60606

Wausau Underwriters Ins. Company
PO Box 8017
Wausau, WI 54402-8017

Wausau Business Ins. Company
PO Box 8017
Wausau, WI 54402-8017

White Mountains Insurance Company
1117 Elm Street
Manchester, NH 03101

Yasuda Fire & Marine Ins. Co.

Two World Financial Center
225 Liberty Street, 43rd Floor
New York, NY 10281

Zenith Insurance Company
21255 Califa Street
Woodland Hills, CA Zip 91367

Zurich Insurance Company
1400 American Lane
Schaumburg, IL. 60196-1050