

SERFF Tracking Number: ACEH-125633233 State: Arkansas
 First Filing Company: ACE American Insurance Company, ... State Tracking Number: EFT \$25
 Company Tracking Number: 08-CML-2007672
 TOI: 05.0 Commercial Multi-Peril - Liability & Non- Sub-TOI: 05.0003 Commercial Package
 Liability
 Product Name: 08-CML-2007672
 Project Name/Number: ADVANTAGE CONVERSION - PACKAGE - (ALL OTHER STATES)/08-CML-2007672

Filing at a Glance

Companies: ACE American Insurance Company, ACE Fire Underwriters Insurance Company, ACE Indemnity Insurance Company, ACE Property & Casualty Insurance Company, Bankers Standard Insurance Company, Insurance Company of North America

Product Name: 08-CML-2007672	SERFF Tr Num: ACEH-125633233	State: Arkansas
TOI: 05.0 Commercial Multi-Peril - Liability & Non-Liability	SERFF Status: Closed	State Tr Num: EFT \$25
Sub-TOI: 05.0003 Commercial Package	Co Tr Num: 08-CML-2007672	State Status: Fees verified and received
Filing Type: Rate/Rule	Co Status:	Reviewer(s): Betty Montesi, Llyweyia Rawlins, Brittany Yielding
	Authors: Connie McFarlane, Karen Schwabe, Renice Cox	Disposition Date: 05/08/2008
	Date Submitted: 05/05/2008	Disposition Status: Exempt from Review
Effective Date Requested (New): 03/01/2009		Effective Date (New): 03/01/2009
Effective Date Requested (Renewal): 03/01/2009		Effective Date (Renewal): 03/01/2009

State Filing Description:

General Information

Project Name: ADVANTAGE CONVERSION - PACKAGE - (ALL OTHER STATES)	Status of Filing in Domicile: Pending
Project Number: 08-CML-2007672	Domicile Status Comments:
Reference Organization:	Reference Number:
Reference Title:	Advisory Org. Circular:
Filing Status Changed: 05/08/2008	
State Status Changed: 05/08/2008	Deemer Date:
Corresponding Filing Tracking Number:	

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Filing Description:

The purpose of this filing is to simultaneously withdraw our independent Advantage Commercial Package Program product that has been on file since 1987 and to replace it with the Insurance Services Office, Inc.'s Commercial Portfolio product. Specifically, it is our intent to adopt the ISO Division Nine – Commercial Package rules with this filing. For your information, we will be utilizing our current ISO filings for the Commercial Property, Inland Marine and Crime & Fidelity Coverage Parts in conjunction with this change. The Advantage Commercial Package Program currently utilizes the ISO General Liability Coverage Part for the liability exposures written on a package basis.

In addition, in order to better accommodate the needs of our customers, we are introducing three new independent Extensions of Coverage endorsements and the associated form rules.

Company and Contact

Filing Contact Information

Renice Cox, Regulatory Specialist renice.cox@ace-ina.com
 436 Walnut Street, WB04G (215) 640-4876 [Phone]
 Philadelphia, PA 19106 (215) 640-4986[FAX]

Filing Company Information

ACE American Insurance Company	CoCode: 22667	State of Domicile: Pennsylvania
PO Box 1000	Group Code: 626	Company Type:
436 Walnut Street		
Philadelphia, PA 19106	Group Name:	State ID Number:
(215) 640-5123 ext. [Phone]	FEIN Number: 95-2371728	

ACE Fire Underwriters Insurance Company	CoCode: 20702	State of Domicile: Pennsylvania
PO Box 1000	Group Code: 626	Company Type:
436 Walnut Street		
Philadelphia, PA 19106	Group Name:	State ID Number:
(215) 640-5123 ext. [Phone]	FEIN Number: 06-6032187	

ACE Indemnity Insurance Company	CoCode: 10030	State of Domicile: Pennsylvania
PO Box 1000	Group Code: 626	Company Type:
436 Walnut Street		

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Philadelphia, PA 19106 (215) 640-5123 ext. [Phone]	Group Name: FEIN Number: 92-0040526 -----	State ID Number:
ACE Property & Casualty Insurance Company PO Box 1000 436 Walnut Street Philadelphia, PA 19106 (215) 640-5123 ext. [Phone]	CoCode: 20699 Group Code: 626 Group Name: FEIN Number: 06-0237820 -----	State of Domicile: Pennsylvania Company Type:
Bankers Standard Insurance Company PO Box 1000 436 Walnut Street Philadelphia, PA 19106 (215) 640-5123 ext. [Phone]	CoCode: 18279 Group Code: 626 Group Name: FEIN Number: 59-1320184 -----	State of Domicile: Pennsylvania Company Type:
Insurance Company of North America PO Box 1000 436 Walnut Street Philadelphia, PA 19106 (215) 640-5123 ext. [Phone]	CoCode: 22713 Group Code: 626 Group Name: FEIN Number: 23-0723970 -----	State of Domicile: Pennsylvania Company Type: State ID Number:

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Filing Fees

Fee Required? Yes
 Fee Amount: \$25.00
 Retaliatory? No
 Fee Explanation:
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
ACE American Insurance Company	\$25.00	05/05/2008	20087526
ACE Fire Underwriters Insurance Company	\$0.00	05/05/2008	
ACE Indemnity Insurance Company	\$0.00	05/05/2008	
ACE Property & Casualty Insurance Company	\$0.00	05/05/2008	
Bankers Standard Insurance Company	\$0.00	05/05/2008	
Insurance Company of North America	\$0.00	05/05/2008	

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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Exempt from Review	Llyweyia Rawlins	05/08/2008	05/08/2008

Amendments

Item	Schedule	Created By	Created On	Date Submitted
Medical Risk Rate Manual Rules - Package		Connie McFarlane	05/07/2008	05/07/2008

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Item Type	Item Name	Item Status	Public Access
Supporting Document	FILE MEMO	Accepted for Informational Purposes	Yes
Supporting Document	POLICYHOLDER NOTICE	Accepted for Informational Purposes	Yes
Supporting Document	NAIC TRANS DOC	Accepted for Informational Purposes	Yes
Supporting Document	ACTUARIAL SUPPORT	Accepted for Informational Purposes	No
Rate	AO - MULTISTATE DIVISION NINE RULE PAGE	Accepted for Informational Purposes	Yes
Rate	INLAND MARINE HANDBOOK PACKAGE EXCEPTION RULE	Accepted for Informational Purposes	Yes
Rate	MANUAL RULES - PACKAGE - ACE EXCEPTION TO IRPM RULE E	Accepted for Informational Purposes	Yes
Rate	Medical Risk Manual Rules - Package	Accepted for Informational Purposes	Yes

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Amendment Letter

Amendment Date:
Submitted Date: 05/07/2008

Comments:

Please accept the attached Rule page for your review as it was inadvertently omitted from this filing. Sorry for any inconvenience this may have caused.

Changed Items:

Rate/Rule Schedule Item Changes:

Exhibit Name:	Rule # or Page #:	Rate Action:	Previous State Filing Numbers:	Attach Document:
Medical Risk Manual Rules - Package	MR-1	New		Medical Risk Manual Rules - Package (All other states).pdf

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Rate/Rule Schedule

Review Status:	Exhibit Name:	Rule # or Page #:	Rate Action	Previous State Filing Attachments Number:
Accepted for Informational Purposes	AO - MULTISTATE DIVISION NINE RULE PAGE	CF-E-1	New	AR - AO - Multistate Division Nine Rule Page.pdf
Accepted for Informational Purposes	INLAND MARINE HANDBOOK PACKAGE EXCEPTION RULE	GEN-1	New	Inland Marine Handbook Package Exception Rule - AR.pdf
Accepted for Informational Purposes	MANUAL RULES - PACKAGE - ACE EXCEPTION TO IRPM RULE E	RP-1	New	Manual Rules - Package - ACE Exception to IRPM Rule 3 (AR).pdf
Accepted for Informational Purposes	Medical Risk Manual Rules - Package	MR-1	New	Medical Risk Manual Rules - Package (All other states).pdf

COMMERCIAL LINES MANUAL

DIVISION NINE – COMMERCIAL PACKAGE

8. PREMIUM DEVELOPMENT

Rule 8.A.1. is replaced by the following:

A. General

1. Refer to the appropriate CLM Divisions for company rates and/or ISO loss costs, rules, rating procedures and codes for all Coverage Parts except the Highly Protected Risks Coverage Part. Use the appropriate Loss Adjustment Factor from the following table in place of the Loss Adjustment Factors otherwise applicable to the various CLM Divisions.

Loss Adjustment Factors

<u>Industry</u>	<u>Property</u>			<u>Inland Marine</u>	<u>General Liability</u>
	<u>Real Property</u>	<u>Personal Property</u>	<u>Time Element</u>		
Communications	0.800	0.800	1.000	0.700	1.200
Life Sciences	1.050	1.150	1.000	1.000	1.200
Psychologists	1.050	1.150	1.000	1.000	1.200
Reverse Flow	1.000	1.000	1.000	1.000	1.000
Warehouses	0.950	1.900	1.000	0.900	1.200
All Other	1.000	1.000	1.000	1.000	1.000

ACE American Insurance Company
ACE Fire Underwriters Insurance Company
ACE Indemnity Insurance Company
ACE Property and Casualty Insurance Company
Bankers Standard Insurance Company
Insurance Company of North America

**COMMERCIAL LINES MANUAL
DIVISION NINE
COMMERCIAL PACKAGE
COUNTRYWIDE RULES
ARKANSAS**

ADDITIONAL RULES

A. COMMERCIAL INLAND MARINE

1. Use the Insurance Service's Office, Inc.'s Inland Marine Handbook forms, rules and loss costs to provide coverage for and to determine the premium for all classes of business included in the Handbook other than:

- ✚ Radio and Television Towers and Equipment
- ✚ Warehouse Operators Legal Liability

In addition, when Motor Truck Cargo coverage is provided to an insured whose operations fall within one of the following Standard Industry Classifications the independent Motor Truck Cargo forms, rules and rates currently on file will be utilized instead of those contained in the Inland Marine Handbook:

Trucking

- 4212 Local Trucking without storage
- 4213 Trucking, except local
- 4214 Local Trucking with storage
- 4215 Courier Services, except by Air

Warehousing

- 4221 Farm Product Warehousing and Storage
- 4222 Refrigerated Warehousing and Storage
- 4225 General Warehousing and Storage
- 4226 Special Warehousing and Storage , Not Elsewhere Classified

Terminal

- 4231 Terminal and Joint Terminal maintenance Facilities for Motor Truck Cargo Transportation

Postal Services

- 4311 United States Postal Services

2. Loss Cost Multiplier

Use the Loss Cost Multiplier that applies to the Division Eight Commercial Inland Marine manual rules.

ACE American Insurance Company
ACE Fire Underwriters Insurance Company
ACE Indemnity Insurance Company
ACE Property and Casualty Insurance Company
Bankers Standard Insurance Company
Insurance Company of North America

**COMMERCIAL LINES MANUAL
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COUNTRYWIDE RULES
ARKANSAS**

3. ISO Inland Marine Handbook Section II. Rules

Rule 7. Additional Premium Changes

Use the amount shown in the company exception to **Rule 10. Additional Premium Changes** in Division Eight – Commercial Inland Marine.

Rule 8. Return Premium Changes

Use the amount shown in the company exception to **Rule 11. Return Premium Changes** in Division Eight – Commercial Inland Marine.

ACE American Insurance Company
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ACE Indemnity Insurance Company
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**COMMERCIAL LINES MANUAL
DIVISION NINE
COMMERCIAL PACKAGE
COUNTRYWIDE RULES EXCEPTION
ARKANSAS**

**INDIVIDUAL RISK PREMIUM MODIFICATION PLAN
3. RATING MODIFICATION**

Rule 3. is replaced by the following:

The company rates for the risk may be modified in accordance with the following rating table to recognize such special characteristics of the risk as are not fully reflected in the basic company premium or company rates. The total credits under the following table shall not exceed 40%.

Rating Modifications

Risk Characteristics	Range of Modifications		
	Credits		Debits
1. Location			
a. Exposure inside premises	10%	to	10%
b. Exposure outside premises	10%	to	10%
2. Premises - conditions, care, suitability for operations conducted	25%	to	25%
3. Equipment - type, condition, care on premises or job site	25%	to	25%
4. Classification peculiarities			
a. Quality Control - Products	20%	to	20%
1. Employee and supervisor			
2. Product testing procedures			
3. Record keeping			
4. Controls on and adequacy of packaging and labels			
5. Plans for product recall			
b. Quality Control - Operations	20%	to	20%
1. Employee and supervisor			
2. Material quality controls			
3. Experience of management			
5. Employee selection, training stability	25%	to	25%
6. Cooperation and safety program			
a. Medical aid facilities	10%	to	10%
b. Safety program	25%	to	25%
c. Cooperation of management with structural features, segregation and control of hazards, and maintenance of protective equipment, as the nature of the risk may require.	25%	to	25%
7. Dispersion or concentration of risk	10%	to	10%
8. Storage practices and hazards	15%	to	15%
9. Roof anchorage and other windstorm characteristics	10%	to	10%
10. Other superior or inferior structural features	10%	to	10%
11. Obsolescence	0%	to	20%
12. Damageability	20%	to	20%
13. Miscellaneous hazards or protective features	15%	to	15%

Table 3. Rating Modifications

ACE American Insurance Company
ACE Fire Underwriters Insurance Company
ACE Indemnity Insurance Company
ACE Property and Casualty Insurance Company
Bankers Standard Insurance Company
Insurance Company of North America

**COMMERCIAL LINES MANUAL
DIVISION NINE
COMMERCIAL PACKAGE
COUNTRYWIDE RULES**

**ADDITIONAL RULES
MEDICAL RISK**

A. PACKAGE FORMS

1. Life Sciences Extensions of Property Coverage **FA-23317** is an optional endorsement that may be used to provide commonly requested extensions of property coverage on Life Science policies. Refer to the endorsement for the additional coverage provided.

Rating:

Apply the appropriate charge based on the number of insured locations in accordance with the following table:

# of locations	premium charge (per policy)
1	\$ 500
2	\$ 875
3	\$1,125
4	\$1,325
5	\$1,500

2. Long Term Care Property Extensions of Property Coverage **FA-23318** is an optional endorsement that may be used to provide commonly requested extensions of property coverage on Long Term Care policies. Refer to the endorsement for the additional coverage provided.

Rating:

Apply the appropriate charge based on the number of insured facilities in accordance with the following table:

# of facilities	premium charge (per policy)
1	\$ 500
2	\$ 875
3	\$1,125
4	\$1,325
5	\$1,500

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ACE Indemnity Insurance Company
ACE Property and Casualty Insurance Company
Bankers Standard Insurance Company
Insurance Company of North America

**COMMERCIAL LINES MANUAL
DIVISION NINE
COMMERCIAL PACKAGE
COUNTRYWIDE RULES**

3. Small Business Preferred Extensions of Property Coverage **FA-23321** is an optional endorsement that may be used to provide commonly requested extensions of property coverage on policies other than for Life Sciences or Long Term Care. Refer to the endorsement for the additional coverage provided.

Rating:

Apply a flat charge of \$150 per policy.

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Supporting Document Schedules

Satisfied -Name: FILE MEMO **Review Status:** Accepted for Informational Purposes 05/08/2008

Comments:

Attachment:

Package Filing Memo - AR.pdf

Satisfied -Name: POLICYHOLDER NOTICE **Review Status:** Accepted for Informational Purposes 05/08/2008

Comments:

Attachment:

Policyholder Notice - ISO Commerical Property 04-02 Edition (All other States).pdf

Satisfied -Name: NAIC TRANS DOC **Review Status:** Accepted for Informational Purposes 05/08/2008

Comments:

Attachments:

NAIC Transmittal RATE -.pdf

RATE RULE SCHEDULE R -.pdf

FILING MEMORANDUM

The purpose of this filing is to simultaneously withdraw our independent Advantage Commercial Package Program product that has been on file since 1987 and to replace it with the Insurance Services Office, Inc.'s Commercial Portfolio product. Specifically, it is our intent to adopt the ISO Division Nine – Commercial Package rules with this filing. For your information, we will be utilizing our current ISO filings for the Commercial Property, Inland Marine and Crime & Fidelity Coverage Parts in conjunction with this change. The Advantage Commercial Package Program currently utilizes the ISO General Liability Coverage Part for the liability exposures written on a package basis.

Background

The Advantage Commercial Package Program consists of independent property forms and endorsements along with a rating approach that employs the ISO Division Five Fire & Allied Lines loss costs and rules with company exceptions to certain ISO rules, most notably all other perils rating, time element rating factors, deductible factors, and schedule rating. ISO Division Six – General Liability is used to provide coverage for the package liability exposures.

Forms

In converting our Advantage package policies to an ISO format we intend to utilize the ISO forms from the following Divisions without deviation to replace our existing Advantage forms:

- ✚ Division Five – Fire & Allied
- ✚ Division Three – Crime & Fidelity
- ✚ Division Eight – Commercial Inland Marine.

We will continue to use the Division Six – General Liability forms on our package policies.

To assist you with your review we have prepared the attached chart which highlights the most significant differences in coverage between the Advantage Commercial Property Coverage Form and the ISO Building and Personal Property Form. We have also enclosed a copy of the policyholder notice we have prepared for our insureds describing the broadenings and restrictions of coverage that will result from this change to the ISO forms.

In addition, in order to better accommodate the needs of our customers, we are introducing three new independent Extensions of Coverage endorsements and the associated form rules.

New Independent Package Forms

The following independent package forms have been developed to provide the commonly requested extensions of coverage, for both property and liability exposures, needed by certain of our customers.

- ✚ Life Sciences Extensions of Property Coverage, **FA-23317**, an optional endorsement that may be used with Life Science policies. A flat charge applies per policy depending on the number of locations.
- ✚ Long Term Care Property Extensions of Property Coverage, **FA-23318**, an optional endorsement that may be used with Long Term Care policies. A flat charge applies per policy depending on the number of locations.

- ✚ Small Business Preferred Extensions of Property Coverage, **FA-23321**, an optional endorsement that may be used Medical Risk policies other than for Life Sciences or Long Term Care. A flat charge of \$150 applies per policy.

The accompanying form usage rules are included in the rate portion of this filing.

Advantage – Inland Marine Coverage

In the Advantage product, coverage for inland marine exposures is provided as a modification to the Advantage Commercial Property Coverage Form, FA-2R62. Going forward we will provide such coverage utilizing the ISO Division Eight – Commercial Inland Marine forms already on file for our companies. In addition, it is our intent to adopt the ISO Inland Marine Handbook forms and associated rules and loss costs for use on a package basis with a couple of exceptions. With respect to Motor Truck Cargo, we will utilize the Handbook for all insureds other than those written for the following SIC codes, where we will utilize our independent filed forms and rates instead.

Trucking

- 4212 Local Trucking without storage
- 4213 Trucking, except local
- 4214 Local Trucking with storage
- 4215 Courier Services, except by Air

Warehousing

- 4221 Farm Product Warehousing and Storage
- 4222 Refrigerated Warehousing and Storage
- 4225 General Warehousing and Storage
- 4226 Special Warehousing and Storage , Not Elsewhere Classified

Terminal

- 4231 Terminal and Joint Terminal maintenance Facilities for Motor Truck Cargo Transportation

Postal Services

- 4311 United States Postal Services

In addition, we will continue to utilize our independent filed forms and rates for the following classes of business:

- ✚ Radio and Television Towers and Equipment;
- ✚ Video and Filmmakers; and
- ✚ Warehouse Operators Legal Liability

Advantage – Crime & Fidelity

In the Advantage Program, Commercial Crime and Fidelity coverage is currently provided as a modification to the Advantage Commercial Property Coverage Form but will now be provided using the ISO Commercial Crime and Fidelity forms without deviation.

Loss Costs and Rules

The Advantage Commercial Package Program utilizes ISO Division Five – Fire & Allied Lines loss costs and rules with company exceptions to certain ISO rules, most notably all other perils rating rules, time element rating factors, deductible factors, and schedule rating. ISO Division Eight – Commercial Inland Marine loss costs and rules are utilized for the so-called filed classes along with our independent Inland Marine forms and rates for all other classes for Inland Marine coverage, and ISO Division Three – Crime & Fidelity loss costs and rules are utilized to rate these exposures.

With the conversion to ISO we will utilize the ISO Division Five rules and loss costs without exception and we will continue to utilize the ISO rules and loss costs already on file for Divisions:

- ✚ Six – General Liability
- ✚ Eight – Commercial Inland Marine
- ✚ Three – Crime & Fidelity

We are also intend to utilize the enclosed the manual rules for the Extensions of Coverage forms contained in the form portion of this filing. Supporting data has been provided for the charges associated with those forms.

ACE Exceptions to ISO Division Nine Rules

It is our intent to adopt the ISO Division Nine – Commercial Package rules with the following exceptions:

- ✚ We wish to retain our existing Advantage schedule rating plan Risk Characteristics and modification ranges as well as the overall credit/debit modification range in place of the ISO Risk Characteristics and modification ranges in Rule 3. Rating Modification of the Individual Risk Premium Modification Plan (IRPM). We intend to adopt the remainder of the IRPM plan without deviation.
- ✚ We intend to utilize the ISO Inland Marine Handbook rules and loss costs for the unfiled classes of business as described above in lieu of the independent Inland Marine rates and rules we have on file for our mono-line business.
- ✚ We are introducing a Loss Adjustment Factor that will vary by coverage and industry group.

Loss Adjustment Factor (LAF)

The conversion to the ISO Program involves the following changes to our existing rating for commercial package policies:

- ✚ The replacement of our Advantage package factors for Property and General Liability with the ISO Division Nine Package Factors.
- ✚ The change from the Advantage rating algorithm to the ISO algorithm for Property coverage.
- ✚ The revision of our underlying Loss Cost Multipliers (LCM) for Commercial Property from a tiered rate level approach to a single LCM rate level approach for all companies. Please see the companion Commercial Property Loss Cost filing, 08-CP-2007651, that has been submitted simultaneously to your department with this filing, for details.

The withdrawal of the Advantage exceptions to the ISO Division Five rating rules and the change in the structure of our LCM has a significant impact on the Property rating algorithm. To mitigate this premium impact to our customers, we are introducing a Loss Adjustment

Factor (LAF) in the rating algorithm. The rate effect of converting to the ISO rating algorithm and of revising the LCM's was estimated for each coverage and industry group. The LAF factor was calculated to offset this rate impact, and achieve overall revenue neutrality by coverage for each industry group.

The attached actuarial exhibits have been provided in support of this change:

Rate Effect Exhibit

- Estimated annual premium
- Proposed LAF's
- Current and Proposed LCM's

Rate Level Indication Package

- Property experience review
- GL experience review

Profit Provision Support

- Property IEE data and Profit Provision calculations
- GL IEE data and Profit Provision calculations

LAF Definitions

The SIC codes associated with each LAF are as follows:

 **Communications**

Communication Services, Not Elsewhere Classified

4899 Communications Services, nec

Motion Picture Production and Allied Services

7812 Motion Picture and Video Tape Production

 **Life Sciences**

Drugs

2834 Pharmaceutical preparations
2835 In vitro and in vivo diagnostic substances
2836 Biological products, except diagnostic substances

Surgical, Medical, and Dental Instruments and Supplies

3841 Surgical and medical instruments and apparatus
3842 Orthopedic, prosthetic, and surgical appliances and supplies
3843 Dental equipment and supplies
3844 X - Ray apparatus and tubes and related irradiation apparatus
3845 Electromedical and electrotherapeutic apparatus

Professional and Commercial Equipment and Supplies

5047 Medical, dental, and hospital equipment and supplies

Research and Development Testing Services

- 8731 Commercial physical and biological research
- 8732 Commercial economic, sociological, and educational research
- 8733 Noncommercial research organizations
- 8734 Testing laboratories

Psychologists

Offices and Clinics of Other Health Practitioners

- 8049 Offices and clinics of health practitioners, nec

Reverse Flow

All SIC codes but limited to policies issued to US multinationals with foreign parent companies also written by ACE abroad.

Warehouses

Trucking and Courier Services, Except Air

- 4212 Local Trucking without storage
- 4213 Trucking, except local
- 4214 Local Trucking with storage
- 4215 Courier Services, except by Air

Public Warehousing and Storage

- 4221 Farm Product Warehousing and Storage
- 4222 Refrigerated Warehousing and Storage
- 4225 General Warehousing and Storage
- 4226 Special Warehousing and Storage , Not Elsewhere Classified

Motor Freight Transportation and Warehousing

- 4231 Terminal and Joint Terminal maintenance Facilities for Motor Truck Cargo Transportation

US Postal Services

- 4311 United States Postal Services

ADVISORY NOTICE TO POLICYHOLDERS (04/02)

This Summary highlights certain changes in coverage resulting from the withdrawal of the Advantage Series Coverage Forms and adopting Insurance Services Office (ISO) Coverage Forms and Endorsements.

No coverage is provided by this summary nor can it be construed to replace any provisions in your policy. You should read your policy and review your declaration page for complete information on the coverage you are provided. If there is any conflict between the policy and this summary **THE POLICY PROVISIONS OF THIS POLICY SHALL PREVAIL.**

This Summary provides a detailed narrative identifying similarities and differences in coverage between the present Advantage Series Commercial Program and the ISO Commercial Property Program (Division Five.) This summary is limited to the Property Coverage Forms, Basic and Special Causes of Loss Forms, Business Income and Extra Expense Forms, Commercial Property Conditions and Common Policy Conditions. Not included in this summary are special conditions, optional forms or endorsements.

Building and Personal Property Coverage Form

Covered Property – Building

1. The definition of Real Property under Advantage is generally anything built on land. Under **Property Not Covered**, ISO excludes specific types of property such as:
 - Bridges, roadways, walks, patios and other paved surfaces
 - Foundations of buildings, structures, machinery or boilers if their foundations are below the lowest basement floor or the surface of the ground, if there is no basement
 - Bulkheads, pilings, piers, wharves or docks
 - Retaining walls that are not part of a building
 - Underground pipes, flues or drains

Coverage for these types of property may be available in ISO as a separate endorsement.

Covered Property – Business Personal Property/Property of Others

1. Under **Covered Property, Your Business Property**, unlike Advantage, ISO provides a separate Limit of Insurance category for **Personal Property of Others**. This Limit of Insurance provides coverage for property of others not defined as covered property under Your Business Personal Property e.g., leased personal property with no obligation to insure or personal property of others not leased. Also, note the following:
 - If the **Personal Effects and Property Of Others** extension applies, a limit of \$2,500 is provided for personal property of others in your care, custody or control.
 - If Business Personal Property is written on a **Replacement Cost** basis, the replacement cost provision will not apply to personal property of others unless the **Extension - Replacement Cost To Personal Property Of Others** is selected.
 - If an item is subject to a written contract which governs liability for loss or damage, the valuation will be based on the amount of which you are liable under such contract.

Property Not Covered

1. ISO excludes land (including land on which the property is located), water, growing crops or **lawns**. Advantage excludes land, water and growing crops only – lawns are covered as described under Extension 2. ISO also excludes while outside buildings:
 - Grain, hay, straw or other crops (Advantage excludes growing crops only)
 - Fences, radio or television antennas (including satellite dishes) and their lead-in wiring, masts or towers, except as provided under the Coverage Extensions. (These items are not excluded as covered property in Advantage.)
2. ISO excludes as covered property personal property while airborne or waterborne. Advantage covers Personal Property Off-Premises under Coverage E. There is no exclusion for property while airborne or waterborne.

3. ISO excludes vehicles (or self-propelled machines) including aircraft or watercraft if licensed for use on public roads; or operated principally away from the described premises. ISO covers:
 - vehicles, self-propelled machines or autos you manufacture, process or warehouse
 - vehicles or self-propelled machines other than autos, you hold for sale
 - rowboats or canoes out of water at the described premises
 - trailers to the extent coverage is provided under the Coverage Extension

There is similar language in Advantage.

Covered Causes of Loss

1. Under **Additional Coverage**, ISO provides a limit of **\$10,000** under **Debris Removal Coverage** if the 25% limitation is exceeded or if the total of the direct physical loss or damage plus debris removal expense exceeds the Limit of Insurance. Advantage provides a limit of \$5,000 as respects these conditions. Under Advantage, increased limits may be available as a separate endorsement.
2. There is different language in ISO and Advantage as respects pollution under **Debris Removal Coverage**: Under ISO, Debris Removal does not apply to costs to **extract** pollutants from land or water or remove, restore or replace polluted land or water.

Under Advantage, Debris Removal does not apply to expense to **clean up** of pollutants from covered property or land, air, or water.

The definition of pollutants under ISO includes **soot** and **smoke**.

While ISO excludes the costs to extract pollutants, coverage applies to the **cost to remove debris of covered property contaminated by a pollutant** as a result of a covered cause of loss under the Debris Removal provision.

3. Under **Additional Coverage - Preservation of Property**, ISO provides coverage for a period of **thirty** days after the covered property is moved. Equivalent coverage under Advantage is provided for a period of ten days.
4. Under **Additional Coverage - Pollutant Clean Up and Removal**, there are the following language differences:
 - Under Advantage, coverage applies to expense incurred for the **clean up** of pollutants from **covered property or land, air or water**. ISO covers the expense to **extract** pollutants from **land or water**. Under ISO, this additional coverage applies **regardless of whether covered property is damaged**. Because of this language difference, under ISO expenses must be reported within 180 days of the date of the **covered cause of loss**. Under Advantage, expenses must be reported within 180 days after the **direct physical loss**.
 - ISO covers the cost to **extract** pollutants from land or water and the **cost for testing** which is performed in the course of extracting the pollutants from the land or water. Coverage does not apply to the costs to test for, monitor or assess the existence, concentration or effects of pollutants.

Advantage covers the expense incurred for clean-up of pollutants from covered property or land, air or water. Clean-up is defined as: Testing, monitoring, removal, containment, treatment, detoxification or neutralization.

- Under ISO, the way pollutants may enter land or water is described as: Discharge, dispersal, seepage, migration, release or escape. Under Advantage, the description is: Presence, release, discharge or dispersal.
 - The definition of pollutants under ISO includes smoke and soot.
5. Under **Additional Coverage**, ISO provides **Increased Cost of Construction**. This extension is applicable to buildings written on a Replacement Cost basis. Coverage applies to the increased costs incurred to comply with enforcement of an ordinance or law in the course of repair, rebuilding or replacement of damaged parts of that property subject to the limitations in the form. The amount of additional insurance provided under this extension is **\$10,000 or 5% of the Limit of Insurance** applicable to the building, whichever is less. It should be noted that this is limited coverage and applies only to damaged parts of the property. Under Advantage, Ordinance or Law may be available as a separate endorsement.

6. ISO provides an extension of coverage for **Valuable Papers and Records (Other than Electronic Data)** and an **Additional Coverage** for **Electronic Data**. Advantage includes electronically produced data in the definition of Valuable Papers and Records. In addition, Advantage policies include the Data Processing Amendment Endorsement ALL-10754 which further amends coverage provided for Electronic Data and Media.

The significant differences resulting from this approach as respects Electronic Data are as follows:

- Advantage covers the cost to restore, research, replace or reproduce Electronic Data under the Valuable Papers and Records Extension up to \$5,000 in one occurrence, subject to specified causes of loss and no deductible applies. ISO provides a limit of \$2,500 for all losses in one policy year. Specified causes of loss and location deductible apply.
- Advantage covers Electronic Data for loss or damage caused by Flood and Earth Movement to the extent such causes of loss are covered under the policy. ISO does not cover these causes of loss or any causes of loss added by endorsement.
- Advantage excludes computer virus; ISO provides limited coverage.

Coverage Extensions

For **Coverage Extensions** to apply, ISO requires a coinsurance percentage of 80% or more or a value reporting period symbol. There is no such requirement in Advantage. Except as otherwise noted, extensions apply to property located in or on the building described in the Declarations or in the open (or in a vehicle) within 100 feet of the described premises. Also, note the policy must cover Building or Business Personal Property for the related Coverage Extensions to apply.

1. Under **Coverage Extensions - Newly Acquired Property**, ISO includes buildings **while being built** on the described premises in addition to building you acquire at other than the described premises. Advantage does not cover buildings while being built under Newly Acquired Property.
2. Under **Coverage Extensions - Newly-Acquired Real Property**, Advantage provides for 180 days after you acquire the property. Under ISO, the **Period of Coverage** is **30** days.
3. Under **Coverage Extensions - Newly-Acquired Business Personal Property**, ISO covers newly-acquired business personal property at a covered location, plus newly-acquired business personal property at a newly constructed or acquired building at the described premises plus business personal property at a newly-acquired location. Advantage provides coverage at a newly-acquired location only.
4. Under **Coverage Extensions - Newly-Acquired Business Personal Property**, ISO specifically excludes business personal property at any location you acquire at fairs, trade shows or exhibitions. No comparable exclusion exists in Advantage.
5. Under **Coverage Extensions - Newly Acquired Or Constructed Property**, ISO excludes personal property of others that is temporarily in your possession in the course of installing or performing work on such property; or personal property of others that is temporarily in your possession in the course of your manufacturing or wholesaling activities. No comparable exclusion exists in Advantage.
6. Under **Coverage Extensions – Personal Effects**, Advantage provides coverage for Personal Effects only for a limit of \$500 any one person; \$5,000 in any one occurrence. Theft is covered, if Comprehensive Protection applies. No deductible applies. Under ISO, similar coverage is provided under **Personal Effects and Property of Others**. The applicable limit is \$2,500 each premises covering both personal effects and personal property of others if in the insured's care, custody or control. For Personal Effects Coverage only, theft is excluded; location causes of loss apply to property of others. The location deductible applies.
7. ISO covers the cost to replace or restore **Valuable Papers and Records (Other than Electronic Data)** up to a limit of \$2,500 at each location. Coverage is provided for specified causes of loss and the location deductible applies. Under Advantage, the limit for the Valuable Papers and Records Extension is \$5,000, the location causes of loss apply and there is no deductible. (It should be noted that the Advantage extension also includes electronic produced data under the definition of Valuable Papers and Records.)

8. Advantage provides a limit of \$10,000 for Personal Property while in transit or temporarily located off your premises. The deductible is \$250. If Comprehensive Protection applies, Earth Movement and Flooding are covered for covered property in transit. If Basic Protection, vehicle collision is a covered cause of loss.

ISO provides two distinct coverages:

- Under **Coverage Extensions - Property Off Premises** for a limit of **\$10,000** if your covered property is temporarily at a location you do not own, lease or operate, in storage at a location you lease, provided the lease was executed after the beginning of the current policy or at a fair, trade show or exhibition. Coverage does not apply to property in or on a vehicle or to property in the care, custody or control of your salesperson unless at a fair, trade show or exhibition. The location deductible and covered causes of loss apply.
 - Under **Causes of Loss Special Form, Additional Coverage Extensions - Property in Transit**, ISO provides a limit of \$5,000. This extension covers your personal property (other than property in the care, custody or control of your salespersons) in transit more than 100 feet from the described premises. However, the property must be in or on a motor vehicle you own, lease or operate while between points in the coverage territory. (Coverage is provided only under Causes of Loss- Special Form and limited causes of loss apply.)
9. Advantage provides a limit of \$5,000 for Signs under Extension 9. The cause of loss covered is the highest level of protection on the policy and subject to a \$250 deductible. ISO covers signs attached to the building for a limit of **\$1,000**. The covered causes of loss are those applicable to the building and the location deductible applies. As respects free-standing signs, coverage is provided under **Coverage Extensions – Outdoor Property**. Coverage is provided for all outdoor property up to a limit of \$1,000 in one occurrence. Limited causes of loss apply and coverage is subject to the location deductible.
 10. Advantage covers Trees, Shrubs, Plants and Lawns under Extension 2. for a limit of \$500 per item; \$2,500 per occurrence subject to named causes of loss. No deductible applies. ISO coverage is provided with other Outdoor Property under **Coverage Extensions – Outdoor Property** subject to a limit of **\$250 per item; \$1,000** for all Outdoor Property in any one occurrence. Coverage is provided for limited causes of loss and the location deductible applies. In addition, unlike Advantage, ISO does not cover lawns.
 11. ISO covers other Outdoor Property such as fences, radio or television antennas (including satellite dishes) and their lead-in wiring, masts or towers only under the **Coverage Extensions - Outdoor Property Extension**. Coverage is for limited causes of loss up to a limit of **\$1,000** for all Outdoor Property in any one occurrence. This type of outdoor property is not excluded as covered property under Advantage.
 12. Under **Coverage Extensions**, ISO includes a coverage extension to provide limited coverage on **Non-owned Detached Trailers**. Coverage is based on contractual responsibility and is provided in the amount of **\$5,000**. The coverage extension is subject to the causes of loss form that applies to the insured's business personal property. Therefore, theft is covered only if the Special Causes of Loss Form applies. This is an additional amount of insurance. There is no comparable extension in Advantage.
 13. Advantage includes an extension to pay for a covered loss to **Accounts Receivable** while they are at a covered location up to a limit of \$5,000. – no deductible applies. ISO has no comparable extension.

Deductible

1. Under ISO **Deductible** provision, the applicable deductible is applied **after** the amount of the loss is reduced, if required by the co-insurance condition or the Agreed Value Optional Coverage. Under the Advantage provisions, the applicable deductible is applied **before** the amount of the loss is reduced, if required by the co-insurance condition.

Loss Conditions

1. Under **Duties in The Event Of Loss or Damage**, ISO requires that all reasonable steps be taken to protect covered property from further damage (not just damage from a covered cause of loss.) Advantage language is further damage by a covered cause of loss.
2. ISO complements the Ordinance or Law Exclusion by adding the following language under **Loss Condition – Loss Payment and Valuation and Optional Coverages -Replacement Cost**:

The cost to repair, rebuild or replace does not include the increased cost attributable to enforcement of any ordinance or law regulating the construction, use or repair of any property.

3. Under ISO **Vacancy**, the definition of a vacant building has been added. Separate provisions apply to tenants of a building versus the owner/general lessee of a building. A building is vacant if the unit or suite rented or leased to the tenant does not contain enough business personal property to conduct customary operations. For policies issued to an owner/general lessee of the building, the building is vacant unless **at least 31% of the total square footage** is rented and used to conduct its customary operations and/or used by the building owner to conduct customary operations. ISO also states that buildings under construction or renovation are not considered vacant. Under Advantage, the building is considered vacant if the building doesn't contain the personal property used in the business that is ordinarily conducted there.

Note: Under ISO **Vacancy Provisions**, if the building has been vacant for more than 60 consecutive days before loss or damage occurs, coverage does not apply to loss or damage caused by:

Vandalism

Sprinkler Leakage (unless you have protected the system against freezing)

Building Glass Breakage

Water Damage

Theft or Attempted Theft

With respect to other covered causes of loss, the amount of the loss is reduced by **15%**.

Under Advantage Comprehensive Protection, the same provisions apply as respects the causes of loss Building Glass and Vandalism. The only other limitation to covered causes of loss is freezing, leakage or overflow from plumbing, heating, air conditioning or any other equipment or appliance are excluded if reasonable steps were not taken to maintain heat in the building or water was drained from the system and the water supply was shut-off.

4. Under **Loss Conditions – Valuation** provision in ISO, if the co-insurance clause is met and the cost to repair or replace is \$2,500 or less, replacement cost will apply even if coverage is actual cash value. ISO provides that specific property will be valued on an actual cash value basis even when attached to the building:
 - Awnings or floor coverings, appliances for refrigerating, ventilating, cooking, dishwashing or laundering or outdoor equipment or furniture.
5. Under Advantage, no co-insurance applies to losses under \$10,000.
6. Under **Loss Conditions – Valuation** provision in ISO, glass is valued at the cost of replacement with safety glazing material if required by law.

Optional Coverage

1. Under ISO **Optional Coverage – Inflation Guard**, if Inflation Guard applies, a percentage is selected to establish the annual increase. Under Advantage, Automatic Inflation Adjustment is included for Real Property; optional for Personal Property and the percentage increase is based on the building cost modifier normally used by the company as the method to establish the annual increase.
2. Under ISO **Optional Coverage – Replacement Cost**, if this option is selected, replacement cost does not apply to:
 - Personal property of others – (See Option - Extension of Replacement Cost To Personal Property of Others)
 - Contents of a residence
 - Works of art etc.
 - Stock, unless the Including Stock option is shown in the declarations

Under Advantage, the only limitation is that replacement cost will not apply to fine arts.

Causes of Loss- Special Form

The Advantage exclusions apply to any loss that involves the excluded cause of loss even if other unexcluded causes of loss were also involved. There is an exception for “resulting fire or explosion” for all excluded causes of loss except “war.” In addition, there are exceptions within some excluded causes of loss where certain resulting losses are covered.

ISO separates exclusions into four categories:

- Category 1. There is no coverage for any loss caused by one of the eight excluded causes of loss in this group even if a covered cause of loss contributed with the excluded cause of loss to produce the damage. Unless a specific exception is made within the text of the exclusion, resulting damage from an unexcluded cause of loss is also excluded. ISO further states that these exclusions apply whether or not the loss event results in widespread damage or affects a substantial area.
- Category 2. The cause of loss only is excluded. If an unexcluded cause of loss results in one of these excluded causes of loss, coverage for loss from the unexcluded cause of loss remains. Where resulting loss from certain causes of loss is granted within the exclusion, coverage for resulting loss is limited to these causes of loss.
- Category 3. There is no coverage for loss or damage caused by or resulting from any of the excluded causes of loss in this category. However, if these excluded causes of loss results in a covered cause of loss, we will pay for the loss or damage caused by a covered cause of loss.

Special exclusions applicable to specific Coverage Forms.

In addition, throughout the coverage forms where Advantage covers **resulting loss or damage** for certain causes of loss, the ISO language is clarified to pay for the loss or damage caused by the **covered peril only** for which ensuing loss coverage is provided.

Category 1. Exclusions

Ordinance of Law

ISO excludes loss or damage caused by the enforcement of any ordinance or law regulating the construction, **use** or repair of any property or requiring the tearing down of any property. Advantage language references construction, repair or demolition only.

ISO adds language to clarify that the exclusion applies with respect to damaged or undamaged property. The exclusion applies whether the ordinance or law is enforced **in the absence of a physical loss** at the insured premises or **following a physical loss** to insured property and applies to **all property** in the event of a physical loss at the insured premises.

Earth Movement

ISO provides four separate categories under the definition of Earth Movement and expands the language to exclude soil conditions, defined in the form, which cause settling, cracking or other disarrangement of foundations or other parts of realty. ISO covers resulting fire or explosion. Under Volcanic eruption, ISO covers resulting fire, building glass breakage or Volcanic Action. Under Volcanic action coverage, all volcanic eruptions that occur within any 168 hour period will constitute a single occurrence. (Under Advantage, the time period is 72 hour period.)

Utility Services

ISO language is essentially the same, except ISO clarifies that failure includes lack of sufficient capacity and reduction in supply. ISO also clarifies that if the failure results in a covered cause of loss, coverage only applies to the loss or damage caused by that covered cause of loss. Note: Unlike Advantage, a more restrictive exclusion applies to Business Income/Extra Expense.

Water

ISO language clarifies the Flood exclusion to include tides and overflow of any body of water. Also, mudslide and mudflow are added to the ISO Flood exclusion. Mudslide is excluded in the Advantage Earthquake Exclusion. Further the following Exclusions, not in Advantage, are added:

- a) water that backs up or overflows from a sewer, drain or sump and

- b) water under the ground surface pressing on, or flowing or seeping through:
 - 1. Foundations, walls, floors or paved surfaces
 - 2. Basements, whether paved or not and
 - 3. Doors, windows or other openings

ISO covers loss or damage caused by resultant fire, explosion or sprinkler leakage.

Category 2 Exclusions

Artificially generated current

ISO language is the same as Advantage, except Advantage covers resulting fire and explosion; ISO covers resulting fire.

Smoke from industrial operations

This exclusion is not in Advantage.

Wear and tear

Rust or other corrosion, decay, deterioration

Advantage covers resulting damage from vehicles or aircraft, sprinkler leakage, water damage, freezing, collapse of a building or falling objects in addition to resulting fire or explosion.

ISO covers resulting damage from specified causes of loss or building glass breakage. Specified causes of loss are defined as: Fire; lightning; explosion, wind or hail; smoke; aircraft or vehicles; riot or civil commotion; vandalism; leakage from fire extinguishing equipment; sinkhole collapse; volcanic action; falling objects; weight of snow, ice or sleet; water damage. Sinkhole collapse and water damage are defined and limitations apply to falling objects.

Hidden or latent defects

Advantage covers resulting fire or explosion.

ISO covers resulting damage from specified causes of loss or building glass breakage. Specified causes of loss are defined as: Fire; lightning; explosion, wind or hail; smoke; aircraft or vehicles; riot or civil commotion; vandalism; leakage from fire extinguishing equipment; sinkhole collapse; volcanic action; falling objects; weight of snow, ice or sleet; water damage. Sinkhole collapse and water damage are defined and limitations apply to falling objects.

Smog

This exclusion is not in Advantage.

Settling, cracking, shrinking or expansion

This exclusion is in Advantage: however, Advantage only covers resulting fire or explosion. ISO covers resulting specified causes of loss and building glass breakage.

Nesting or infestation

Advantage excludes loss or damage caused by animals but covers resulting fire or explosion. ISO excludes nesting or infestation, or discharge or release of waste products or secretions only. This language is less restrictive than Advantage.

Mechanical Breakdown

Advantage excludes Mechanical Breakdown but covers resulting fire or explosion. ISO excludes Mechanical Breakdown, including rupture or bursting caused by centrifugal force. ISO covers resulting elevator collision, specified causes of loss and building glass breakage.

Personal property causes of loss exclusions:

- a) **Dampness or dryness of atmosphere**
- b) **Changes in or extremes of temperature; or**
- c) **Marring or scratching.**

Advantage excludes change of temperature and humidity unless the loss or damage to covered property caused by a change in temperature or humidity results from physical damage to a building or equipment at a covered location.

As respects marring or scratching, Advantage covers resulting damage from vehicles or aircraft, sprinkler leakage, water damage, freezing, collapse of a building or falling objects in addition to resulting fire or explosion.

ISO covers resulting damage from specified causes of loss or building glass for the three excluded causes of loss.

Discharge caused by freezing

Under ISO water and other liquids that leak from plumbing, heating etc. caused by or resulting from freezing is excluded unless heat is maintained or you drain the equipment and shut off the supply if heat is not maintained.

Under Advantage this exclusion applies only in a vacant or unoccupied building. Advantage does, however, exclude damage to plumbing systems located underground outside the perimeter of building walls or off the premises that results from freezing under any condition.

Employee Dishonesty

ISO language is essentially the same as Advantage.

Under the Employee Dishonesty Exclusion, ISO excludes dishonest or criminal acts. ISO allows an exception for acts of destruction by your employees, excluding theft.

Advantage excludes dishonest acts or omissions. (Therefore, theft by an employee would be excluded; vandalism would be covered.)

Voluntary parting with property

ISO excludes voluntary parting of any property if induced to do so by any fraudulent scheme, trick device or false pretense. This language is not in Advantage.

Precipitation damage to personal property outdoors

ISO excludes rain, snow, ice or sleet to personal property in the open. This language is not in Advantage.

Collapse (except as provided under the collapse additional coverage)

ISO excludes Collapse, except as provided in Additional Coverage for Collapse. But if Collapse results in a Covered Cause of Loss at the described premises, coverage will apply to loss or damage caused by that Covered Cause of Loss.

This exclusion is not in Advantage.

Release of pollutants

- ISO excludes loss or damage caused by the discharge, dispersal, seepage, migration, release or escape of pollutants. Under Advantage, the description is presence, release, discharge or dispersal.
- The definition of pollutants under ISO includes smoke and soot.
- Under ISO, damage by pollutants is covered only if the release is caused by one of the specified causes of loss. Advantage contains similar language; however, the causes of loss differ. ISO covers additional causes of loss namely: falling objects, weight of snow, ice or sleet and water damage. Advantage covers sonic boom while ISO does not. Coverage is also different to the extent the causes of loss have different definitions.
- In addition, under ISO even if the damage by pollutants is not caused by a specified cause of loss and is therefore not covered, resulting damage from one of the specified causes of loss is covered. Advantage covers resulting loss but for fire and explosion only. ISO covers additional causes of loss namely: lightning, windstorm or hail,

smoke, aircraft or vehicles, riot or civil commotion, vandalism, leakage from fire extinguishing equipment, sinkhole collapse, volcanic action, falling objects, weight of snow, ice or sleet and water damage.

The Advantage Comprehensive Protection provides a separate exclusion for Asbestos.

Category 3 Exclusions

Weather Conditions

ISO explicitly excludes weather conditions but only if weather conditions contribute in any way with a cause or event excluded in the “concurrent causation” Group 1 Exclusions to produce the loss or damage. However, resulting loss or damage from any otherwise unexcluded cause of loss is covered.

There is no such language in Advantage although concurrent causation language is applicable to all exclusions.

Acts or decisions

ISO excludes acts or decisions, including the failure to act or decide, of any person, group, organization or governmental body.

There is no such language in Advantage although concurrent causation language is applicable to all exclusions.

Faulty, inadequate or defective

Advantage excludes faulty design, workmanship and material including the cost of correcting any faulty design, workmanship, material, manufacture or installation, alteration, repair or work but covers resulting loss or damage if it occurs in connection with a cause of loss not otherwise excluded.

ISO expands this definition to also exclude:

- 1) Planning, zoning, development surveying, siting;
- 2) Design, specifications, workmanship, repair, construction, renovation, remodeling, grading, compaction;
- 3) Materials used in repair, construction, renovation or remodeling or
- 4) Maintenance

of part or all of any property on or off the described premises.

Special Exclusions

ISO provisions applicable only to specified Coverage Forms:

BUSINESS INCOME (AND EXTRA EXPENSE) COVERAGE FORM BUSINESS INCOME (WITHOUT EXTRA EXPENSE) COVERAGE FORM EXTRA EXPENSE COVERAGE FORM

ISO specifically excludes the following causes of loss:

1. Loss caused directly or indirectly by the failure of power or other utility service however caused if the failure occurs **outside** of a covered building. But if the failure of power or other utility service results in a covered cause of loss, coverage applies to the resulting loss. (With the reference to outside of a covered building, there is no coverage for business income or extra expense loss resulting from damage to transmission lines even if the damaged transmission lines are on the insured’s premises.) ISO further defines failure to include lack of sufficient capacity and reduction in supply.

Advantage excludes Utility Service under direct damage but does not contain the more restrictive exclusion for Business Income or Extra Expense.

2. Loss caused by or resulting from damage or destruction of finished stock or the time required to reproduce finished stock. This exclusion does not apply to Extra Expense. This language does not appear in Advantage.
3. Loss caused by or resulting from direct physical damage to radio or television antennas (including satellite dishes) and their lead-in wiring, masts or towers. This language does not appear in Advantage.

4. (b) Under Suspension, lapse or cancellation of any license, lease or contract, ISO clarifies that if the suspension, lapse or cancellation is directly caused by the suspension of operations, coverage will apply to such loss that affects your business income during the period of restoration.
5. ISO excludes any Extra Expense caused by or resulting from suspension, lapse or cancellation of any license, lease or contract beyond the period of restoration. Advantage excludes loss of income and extra expense that results from the expiration, suspension or cancellation of any contract, lease or order.

Limitations

Under ISO the following Limitations apply to **all policy forms** and endorsements, unless otherwise noted:

- ISO excludes loss or damage to the interior of any building or structure or to personal property in the building or structure caused by or resulting from rain, snow, sleet, ice, sand or dust, whether driven by wind or not unless:
 1. The building first sustains damages by a covered cause of loss to roof or walls through which the rain, snow, sleet, ice, sand or dust enters or
 2. The loss or damage is caused by or results from thawing of snow, sleet or ice on the building.

This exclusion is not in Advantage.

- ISO excludes loss or damage to building materials and supplies not attached as part of the building caused by or resulting from **theft**. This limitation does not apply to:
 1. Building materials and supplies held for sale by you unless they are insured under the Builders Risk Coverage Form or
 2. Business Income or Extra Expense Coverage.

This exclusion is not in Advantage.

- ISO excludes loss or damage to property that has been transferred to a person or to a place outside the described premises on the basis of unauthorized instructions.

This exclusion is not in Advantage.

- ISO limits coverage to loss or damage for certain types of property to specified causes of loss or building glass breakage:
 - a) Animals, and then only if they are killed or their destruction is made necessary.
 - b) Fragile articles such as statuary, marbles, chinaware and porcelains, if broken. This restriction does not apply to:
 1. Glass; or
 2. Containers of property held for sale.
 - c) Builders' machinery, tools and equipment owned by you or entrusted to you, provided such property is Covered Property.

This Limitation does not apply to Business Income or Extra Expense Coverage.

This exclusion is not in Advantage.

- ISO provides a sub-limit for certain types of property if the loss or damage is the result of any one occurrence of **theft**. The sub-limit represents the **total limit** for all property in that category in any one occurrence of theft regardless of the types or number of articles are lost or damaged:
 - a) \$2,500 for furs, fur garments and garments trimmed with fur.
 - b) \$2,500 for jewelry, watches, watch movements, jewels, pearls, precious and semi-precious stones, bullion, gold, silver, platinum and other precious alloys or metals. Not applicable to jewelry and watches worth \$100 or less per item.

- c) \$2,500 for patterns, dies, molds and forms.
- d) \$250 for stamps, tickets, including lottery tickets held for sale, and letters of credit.

This Limitation does not apply to Business Income or Extra Expense.

These limitations do not apply in Advantage.

- ISO excludes the cost to repair any defect to a system or appliance from which water or other liquid escapes. There is an exception for the cost to repair or replace damaged parts of fire extinguishing equipment if the damage results in discharge of any substance from an automatic fire protection system or is directly caused by freezing. (Not applicable to Business Income or Extra Expense.)

This limitation is not in Advantage.

- Under Comprehensive Protection in Advantage, building glass coverage is limited for certain causes of loss, notably theft, to \$100 per plate; \$500 per occurrence. Under Advantage, Building Glass Coverage does not apply to Exterior Signs.

These restrictions are not in ISO.

Additional Coverage

Collapse

ISO has introduced special provisions applicable to Buildings (or any part of a building), Outdoor Property and Personal Property as respects collapse.

- Due to various interpretations of the term collapse, there is now a specific definition as respect buildings (or any part of a building.) Except with respect to collapse from one of the form's covered causes of loss, coverage for collapse of a building or part of a building applies only to loss from a sudden falling down or caving in of the structure. A building in danger of falling down is not considered to have collapsed.
- Coverage for loss from the collapse of a building, a part of a building, or personal property in a building applies only if the collapse was the result of one of the specified caused of loss or one of the following:
 1. building glass breakage
 2. weight of people or personal property
 3. weight of rain on a roof
 4. hidden decay, insect or vermin damage of which the insured had no knowledge of prior to the collapse or
 5. faulty materials or workmanship during construction or renovation.
- Coverage for certain type of covered outdoor property, including retaining walls, walks, roadways etc. applies if the collapse is caused by one of the covered causes of loss listed above and such loss or damage is the direct result of collapse.
- If personal property abruptly falls down or caves in (not the result of a collapse of a building), coverage will apply if the collapse was caused by a covered cause of loss listed above and the personal property is inside a building. Coverage does not apply if marring and/or scratching is the only damage to that personal property caused by the collapse.

Advantage does not specifically address collapse as noted above.

Additional Coverage Extensions

Property in Transit

As noted in the comments under the Property Off Premises Extension, the ISO coverage for Property in Transit for a limit of \$5,000 is less coverage than that provided in Advantage:

Under ISO:

- Coverage only applies if the property is in or on a motor vehicle you own, lease or operate.
- Coverage does not apply to property in the care, custody or control of your salespersons.
- Coverage does not apply while airborne or waterborne.
- Limited causes of loss apply.
- Specific requirements apply to theft coverage e.g., there must be theft of an entire bale, case or package by forced entry into a securely locked body or compartment of the vehicle. There must be visible marks of the forced entry.
- Unlike Advantage, Earthquake and Flood are not covered

Water Damage etc.

ISO specifically states that for a covered water loss e.g., damage from leakage of a substance from a broken or cracked system or appliance, occurring over a period of less than 14 days, coverage will apply to the cost to tear out and replace any part of the building or structure (even if undamaged) to repair damage to the system or appliance from which the water or other substance escapes. Advantage does not specifically address this type of expense associated with repair or replacement.

Glass

ISO specifically states that coverage applies for expenses incurred to put up temporary plates or board up openings if repair or replacement of damaged glass is delayed. There is also coverage for expenses incurred to remove or replace obstructions when repairing or replacing glass that is part of a building but does not include removing or replacing window displays. Advantage does not specifically address this type of expense associated with repair or replacement.

Definitions

ISO further defines some causes of loss included in Specified Causes of Loss. Other than sinkhole collapse, these causes of loss are not specifically defined in Advantage:

a) Sinkhole Collapse

Under the cause of loss Sinkhole Collapse, ISO excludes under the definition sinkhole or collapse into **man-made underground cavities**. No comparable exclusionary language in Advantage.

b) Falling Objects

Under the cause of loss Falling Objects, ISO excludes loss or damage to personal property in the open or the interior of a building or structure, or property inside a building or structure, unless the roof or an outside wall of the building or structure is first damaged by a falling object. (There is no specific definition of falling objects in Advantage.)

c) Water Damage

Under the cause of loss Water Damage, ISO defines water damage as the accidental discharge or leakage of water or steam as the direct result of the breaking apart or cracking of a plumbing, heating, air conditioning or other system or appliance (other than a sump system including its related equipment and parts), that is located on the described premises and contains steam or water. (There is no specific definition of water damage in Advantage.)

Business Income/Extra Expense Coverage Forms

Coverage – Business Income

Under ISO **Business Income**, the type of income to be covered is selected e.g., Business Income including Rental Value; Business Income other than Rental Value and Rental Value. Depending on the type of income, different provisions, definitions apply. This approach provides more flexibility in selecting coverage options by type of income.

Like Advantage, ISO language does not require that the direct damage and the loss of income be incurred at the same location.

ISO adds language specific to insureds who only occupy a portion of the site at which the described premises are located. Described premises means the portion of the building which you rent, lease or occupy and any area within the building or on the site at which the described premises are located, if that area services, or is used to gain access to the described premises.

Coverage – Extra Expense

When insuring Extra Expense under the Business Income (And Extra Expense) Coverage Form, Extra Expense may only be provided at locations where Business Income also applies. Under the combined form, there is no separate limit for Extra Expense and a monthly limitation does not apply.

Advantage Coverage D. **Extra Expense** is covered up to a limit of \$10,000. There is no comparable extension under ISO.

Additional Limitations

Interruption Of Computer Operations

1. Coverage for suspension of operations (Business Income) or expense for action taken to avoid or minimize a suspension (Extra Expense) is excluded if caused by destruction or corruption of electronic data or any loss or damage to electronic data except as provided under Additional Coverages – Interruption Of Computer Operations.

Additional Coverage

Civil Authority

Under **Prohibited Access by Civil Authority**, ISO provides coverage for 3 consecutive weeks, subject to a 72 hour deductible. (The 72 hour Deductible does not apply to Extra Expense) Under Advantage, coverage is provided for 2 weeks, subject to the location deductible.

Extended Business Income

Under **Extended Business Income**, ISO specifically states that Extended Business Income does not apply to loss of Business Income incurred as a result of unfavorable business conditions caused by the impact of the loss in the area where the described premises are located. Language is added to describe when coverage begins and ends specific to Rental Value income.

Interruption of Computer Operations

Under Additional Coverage – Interruption Of Computer Operations, coverage is provided for business income loss and/or extra expense (depending on the Coverage Form on the policy) arising from a business interruption caused by destruction or corruption of electronic data subject to a limit of \$2,500 for all loss sustained in one policy year. Coverage is limited to specified causes of loss, including limited coverage for computer virus.

Coverage Extensions

Under ISO **Coverage Extensions**, if 50% or more coinsurance applies, coverage under Business Income and/or Extra Expense (depending on the Coverage Form on the policy) is extended to apply to property at any location you acquire other than fairs or exhibitions. An additional amount of insurance of \$100,000 at each location applies for 30 days. There is no comparable extension in Advantage.

Loss Determination

Under **Loss Determination – Business Income**, ISO specifically states that Net Income does not include any Net Income that would likely have been earned as a result of an increase in the volume of business due to favorable business conditions caused by the impact of the loss on customers or on other businesses.

Additional Condition – Coinsurance

Under ISO **Additional Condition - Coinsurance**, there is a co-insurance provision under Business Income Coverage, unless one of the Business Income options is selected. There is no coinsurance penalty calculated at the time of the loss under Advantage.

Under **Additional Condition – Coinsurance**, ISO specifically identifies which operating expenses will be deducted from the total of all operating expenses for the purpose of applying the coinsurance condition under Business Income.

Optional Coverage

Under ISO **Business Income Option -Agreed Value**, to activate this option a Business Income Report/Work Sheet must be submitted to the company.

Definitions

Period of Restoration A 72 hour deductible applies specific to Business Income. Suspension is defined as the **slowdown** or cessation of your business activities. (This language clarifies that a complete shutdown is not required for coverage to apply.) Under Advantage, there is an occurrence deductible applicable to Real Property, Personal Property, Loss of Income and Extra Expense. Under Advantage, Loss of Income applies if your operations are interrupted.

Commercial Property Conditions/Common Policy Conditions

Cancellation

Under the cancellation conditions in the basic policy, if the insured cancels, under Advantage the cancellation is pro-rata. Under ISO the cancellation may be less than pro-rata. The cancellation notice requirement under Advantage for cancellations for other than non-pay is 45 days. Under ISO, the notice requirement is 30 days.

Property & Casualty Transmittal Document

1. Reserved for Insurance Dept. Use Only	2. Insurance Department Use only a. Date the filing is received: b. Analyst: c. Disposition: d. Date of disposition of the filing: e. Effective date of filing: <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">New Business</td> <td></td> </tr> <tr> <td>Renewal Business</td> <td></td> </tr> </table> f. State Filing #: g. SERFF Filing #: h. Subject Codes	New Business		Renewal Business	
New Business					
Renewal Business					

3. Group Name	Group NAIC #
ACE USA	626

4. Company Name(s)	Domicile	NAIC #	FEIN #
ACE American Ins. Co.	PA	22667	95-2371728
ACE Fire Underwriters Ins. Co.	PA	20702	06-6032187
ACE Property & Casualty Ins. Co.	PA	20699	06-0237820
ACE Indemnity Ins. Co.	PA	10030	92-0040526
Bankers Standard Insurance Company	PA	18279	59-1320184
Insurance Company of North America	PA	22713	23-0723970

5. Company Tracking Number	08-CML-2007672 R
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Contact Info of Filer(s) or Corporate Officer(s) [include toll-free number]

6.	Name and address	Title	Telephone #s	FAX #	e-mail
	Renice Cox 510 Walnut Street WB04G Philadelphia, PA 19106	Regulatory Specialist	(215) 640-4876	(215) 640-4986	Renice.cox@ace-ina.com

7. Signature of authorized filer	
8. Please print name of authorized filer	Renice Cox

Filing information (see General Instructions for descriptions of these fields)

9. Type of Insurance (TOI)	CMP Liability & Non-Liability
10. Sub-Type of Insurance (Sub-TOI)	Commercial Package
11. State Specific Product code(s)(if applicable)[See State Specific Requirements]	
12. Company Program Title (Marketing title)	
13. Filing Type	<input type="checkbox"/> Rate/Loss Cost <input type="checkbox"/> Rules <input checked="" type="checkbox"/> Rates/Rules <input type="checkbox"/> Forms <input type="checkbox"/> Combination Rates/Rules/Forms <input type="checkbox"/> Withdrawal <input type="checkbox"/> Other (give description)
14. Effective Date(s) Requested	New: 03/01/09 Renewal: 03/01/09

Property & Casualty Transmittal Document---

15.	Reference Filing?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
16.	Reference Organization (if applicable)	
17.	Reference Organization # & Title	
18.	Company's Date of Filing	5/2/08
19.	Status of filing in domicile	<input type="checkbox"/> Not Filed <input checked="" type="checkbox"/> Pending <input type="checkbox"/> Authorized <input type="checkbox"/> Disapproved

20.	This filing transmittal is part of Company Tracking #	08-CML-2007672 R
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21.	Filing Description [This area can be used in lieu of a cover letter or filing memorandum and is free-form text]
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Withdraw Advantage Commercial Package Program and adopt ISO Portfolio Division Nine - Commercial Package Rules with several ACE exceptions.

22.	Filing Fees (Filer must provide check # and fee amount if applicable) [If a state requires you to show how you calculated your filing fees, place that calculation below]
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Check #: EFT
Amount: 25.00

Refer to each state's checklist for additional state specific requirements or instructions on calculating fees.

*****Refer to each state's checklist for additional state specific requirements (i.e. # of additional copies required, other state specific forms, etc.)**

These pages are informational only and do not need to be submitted with your filings!

Notes for Uniform Property & Casualty Transmittal Document

DESCRIPTION OF ITEMS IN THE PROPERTY AND CASUALTY TRANSMITTAL DOCUMENT

- 1. Reserved for Insurance Dept. Use Only**—this section is for anything the Dept. wishes to capture—such as date stamps, approval stamps, check routing numbers, accounting codes, etc.
- 2. Insurance Department Use Only Box:** Includes the following information: (It is up to the state to determine which, if any, of this info they wish to record—or it may be recorded in #1 box with stamps (for example))
 - a. Date the filing is received by the Insurance Dept.**
 - b. Analyst**—lead analyst who reviewed the filing and assigns final disposition
 - c. Disposition**—this is the disposition that the Dept. assigns—authorized, approved, filed, withdrawn, disapproved, informational only, etc.
 - d. Date of Disposition of the filing**—date filing is finished
 - e. Effective Date of the Filing**—date the filing goes into effect. This date may vary by state—it might be the “approval” date in some states. It might be the implementation date in some states. It might be the received date in some states. The Dept. should use the date that is applicable in their state.
 - f. State Filing #:** The number the state assigns to the filing (if applicable).
 - g. SERFF Filing #:** Some states may use SERFF to track paper filings and will use that SERFF assigned number.
 - h. Subject Codes** – This field is intended to capture one or more Subject Codes for states to track particular attributes of a filing, such as mold exclusions. The codes or terms used would be variable by state.
- 3. Group Name and Group NAIC #** as assigned by NAIC.
- 4. Company Name(s), State of Domicile, NAIC #, FEIN#, State #:** Every company to which this filing applies must be listed and the company information must be supplied, with the exception of the State # (the company specific code) if not available or not required by the filing jurisdiction. A filing that lists a group without supplying company info will not be accepted in most states.
- 5. Company Tracking Number:** The filing number assigned by the insurance company, if any.
- 6. Contact Info of Filer or Corporate Officer:** The company should supply the information on the person the state should contact if there is a question/problem with the filing. If there is more than one person (perhaps, one for rates, one for forms) then both should be listed.
- 7. Signature of authorized filer:** Some states require a signature of the authorized filer. If the filer is third party, a letter of authorization from the insurer must be submitted according to state requirements.
- 8. Please print name of authorized filer:** So we can decipher #7 above!
- 9. Type of Insurance (TOI):** Refer to Uniform Property & Casualty Product Coding Matrix. This corresponds to the column entitled “SERFF Type of Insurance” and roughly corresponds to the annual statement line of business.
- 10. Sub-type of Insurance (Sub-TOI):** Refer to Uniform Property & Casualty Product Coding Matrix. This corresponds to the column entitled “SERFF Sub-Type of Insurance”.
- 11. State Specific Product code(s):** See State Specific Requirements for these codes
- 12. Company Program Title:** Marketing title, if applicable.
- 13. Filing Type:** Choices are Rate/Loss Cost; Rules; Rates/Rules; Forms; Withdrawal; Other.

14. Effective Date Requested: This is the effective date the company requested when they made the filing. It is not necessarily the date the filing officially becomes effective. This is also where the company can indicate the different effective dates for new or renewal business.

15. Reference Filing: Yes/No

16. Reference Organization (if applicable): The name of the advisory organization—i.e. ISO, NCCI, AAIS, etc. or an Insurance Company name if “me too filing” is permitted. Some states allow companies to reference another company’s filing. A “me too” filing is when one company adopts another company’s filing. Usually they are not part of the same group. You should check with each state to determine their rules on these filings. If permitted, use this area to indicate either an advisory organization name or “me too” company name.

17. Reference Organization Number & Title (if applicable): This is the unique number that the reference organization gives to the filing. It is generally not the same number as the circular number.

18. Company’s Date of filing: The date the company sends the filing.

19. Status of filing in domicile: Place for the company to show if filing has been filed in domicile and its status.

20. This filing transmittal is part of Company Tracking #: This ties all of the pages of the transmittal to the same filing. It is helpful for the state.

21. Filing Description: This area can be used in lieu of a cover letter or filing memorandum and is free-form text.

22. Filing Fees: Please refer to each state’s checklist for additional state specific requirements or instructions on calculating fees.

RATE/RULE FILING SCHEDULE

(This form must be provided ONLY when making a filing that includes rate-related items such as Rate; Rule; Rate & Rule; Reference; Loss Cost; Loss Cost & Rule or Rate, etc.)

(Do not refer to the body of the filing for the component/exhibit listing, unless allowed by state.)

1.	This filing transmittal is part of Company Tracking #	08-CML-2007672 R
2.	This filing corresponds to form filing number (Company tracking number of form filing, if applicable)	08-CML-2007672 F

Rate Increase
 Rate Decrease
 Rate Neutral (0%)

3.	Filing Method (Prior Approval, File & Use, Flex Band, etc.)	USE & FILE
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4a.	Rate Change by Company (As Proposed) N/A
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Company Name	Overall % Indicated Change (when applicable)	Overall % Rate Impact	Written premium change for this program	# of policyholders affected for this program	Written premium for this program	Maximum % Change (where required)	Minimum % Change (where required)

4b.	Rate Change by Company (As Accepted) For State Use Only
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Company Name	Overall % Indicated Change (when applicable)	Overall % Rate Impact	Written premium change for this program	# of policyholders affected for this program	Written premium for this program	Maximum % Change	Minimum % Change

5. Overall Rate Information (Complete for Multiple Company Filings only)

		COMPANY USE	STATE USE
5a.	Overall percentage rate indication (when applicable)		
5b.	Overall percentage rate impact for this filing		
5c.	Effect of Rate Filing – Written premium change for this program		
5d.	Effect of Rate Filing – Number of policyholders affected		

6.	Overall percentage of last rate revision	
7.	Effective Date of last rate revision	
8.	Filing Method of Last filing (Prior Approval, File & Use, Flex Band, etc.)	

9.	Rule # or Page # Submitted for Review	Replacement or Withdrawn?	Previous state filing number, if required by state
01	CF-E-1	<input checked="" type="checkbox"/> New <input type="checkbox"/> Replacement <input type="checkbox"/> Withdrawn	
02	GEN-1	<input checked="" type="checkbox"/> New <input type="checkbox"/> Replacement <input type="checkbox"/> Withdrawn	
03	RP-1	<input checked="" type="checkbox"/> New <input type="checkbox"/> Replacement <input type="checkbox"/> Withdrawn	
04		<input checked="" type="checkbox"/> New <input type="checkbox"/> Replacement <input type="checkbox"/> Withdrawn	

These pages are informational only and do not need to be submitted with your filings!

Notes for Rate/Rule Filing Transmittal

DESCRIPTION OF ITEMS IN THE RATE FILING SCHEDULE

RATE/RULE FILING SCHEDULE

1. This filing transmittal is part of Company Tracking #: This ties all of the pages of the transmittal to the same filing. It is helpful for the state.

2. This filing corresponds to form filing number: Many states require that rates and forms be submitted separately due to different review procedures that are required by law. For those states, this will tie the form filing with the associated rate filing, if there is one. **Use check boxes to indicate if this is a rate increase, a rate decrease or rate neutral.**

3. Filing Method (Prior Approval, File & Use, Flex Band, etc): This is the review method for which the filing is being submitted. See State Specific Requirements.

4. Rate Change by Company: Complete all fields for each company included in the filing.

- **Overall % Indicated Change (when applicable)** - This field is only to be completed when an actuarial indication is included in the filing submission.
- **Overall % Rate Impact** - This is the statewide average percentage change to the accepted rates for the coverages included for each company.
- **Written premium change for this program** - This is the statewide change in written premium based on the proposed overall percentage rate impact for each company.
- **# of policyholders affected for this program** - This is the number of policyholders affected by the overall percentage rate impact for each company.
- **Written premium for this program** - This is the statewide written premium for each company.
- **Maximum % Change & Minimum % Change** – This information should be completed if required by the state to which the filing is being submitted.
 - If all the policyholders get increases, then the maximum change is the largest increase and the minimum change is the smallest increase.
 - If all the policyholders get decreases, then the maximum change is the smallest decrease and the minimum change is the largest decrease.
 - If some of the policyholders get increases and others get decreases, then the maximum change is the largest increase and the minimum change is the largest decrease.

5a. Overall percentage rate indication (when applicable): These fields are only to be completed when an actuarial indication is included in the filing submission.

5b. Overall percentage rate impact for this filing: This is the statewide average percentage change to the accepted rates for the coverages included in the filing. This field only needs to be completed for group filings.

5c. Effect of Rate Filing—Written Premium Change for this program: This is the statewide change in written premium based on the proposed overall percentage rate impact. This field only needs to be completed for group filings.

5d. Effect of Rate Filing—Number of policyholders affected: This is the number of policyholders affected by the overall percentage rate impact. This field only needs to be completed for group filings.

6. Overall percentage of last rate revision: This is the statewide average of the last percentage change implemented in the state.

7. Effective Date of last rate revision: This is the implementation date of the last overall percentage rate impact.

8. Filing Method of Last Filing (Prior Approval, File & Use, Flex Band, etc): This is the review method for which the last filing was submitted. See State Specific Requirements.

9. Rule # or Page # Submitted for Review: This is the list of changes to the rate/rule manual.

To be complete a filing must include the following:

- A completed Property & Casualty Transmittal Document (PC TD-1).
- A completed Form Filing Schedule Document (PC FFS-1), when applicable. **Do not refer to the body of the filing for the forms listing, unless allowed by state.**
- A completed Rate/Rule Filing Transmittal document (PC RRFS-1), when applicable. **Do not refer to the body of the filing for the forms listing, unless allowed by state.**
- The appropriate state specific requirements.
- The appropriate filing fees, when required.
- A postage-paid, self-addressed envelope large enough to accommodate the return of acknowledgement, as required by state.
- You should refer to each state's checklist for additional state specific requirements (i.e. # of additional copies required, other state specific forms, etc.)