

SERFF Tracking Number: TSMP-125716650 State: Arkansas  
 Filing Company: Allied World National Assurance Company State Tracking Number: EFT \$100  
 Company Tracking Number: AWNAC-PRIVATE-AR-01 (R)  
 TOI: 17.1 Other Liability - Claims Made Only Sub-TOI: 17.1019 Professional Errors & Omissions Liability  
 Product Name: Allied World National Assurance Company Resolute Portfolio For Private Companies Program  
 Project Name/Number: Resolute Portfolio For Private Companies Program/AWNAC-PRIVATE-AR-01 (R)

## Filing at a Glance

Company: Allied World National Assurance Company

Product Name: Allied World National Assurance SERFF Tr Num: TSMP-125716650 State: Arkansas

Company Resolute Portfolio For Private Companies Program

TOI: 17.1 Other Liability - Claims Made Only

SERFF Status: Closed

State Tr Num: EFT \$100

Sub-TOI: 17.1019 Professional Errors & Omissions Liability

Co Tr Num: AWNAC-PRIVATE-AR-01 (R) State Status: Fees verified and received

Filing Type: Rate

Co Status:

Reviewer(s): Betty Montesi, Edith Roberts

Authors: Audrey Moses, Jonathan Ramos

Disposition Date: 07/09/2008

Date Submitted: 07/03/2008

Disposition Status: Exempt from Review

Effective Date Requested (New): 08/04/2008

Effective Date (New):

Effective Date Requested (Renewal):

Effective Date (Renewal):

State Filing Description:

## General Information

Project Name: Resolute Portfolio For Private Companies Program

Status of Filing in Domicile: Pending

Project Number: AWNAC-PRIVATE-AR-01 (R)

Domicile Status Comments: Filing is pending in the state of domicile New Hampshire.

Reference Organization:

Reference Number:

Reference Title:

Advisory Org. Circular:

Filing Status Changed: 07/09/2008

State Status Changed: 07/09/2008

Deemer Date:

Corresponding Filing Tracking Number:

Filing Description:

Tressler, Soderstrom, Maloney & Priess, LLP is submitting the above referenced Resolute Portfolio<sup>SM</sup> For Private Companies Program ("Program") for your review on behalf of Allied World National Assurance Company. This new

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Program offers the following types of commercial liability coverage to private companies: (1) directors and officers liability; (2) employment practices liability; and (3) fiduciary liability.

## Company and Contact

### Filing Contact Information

(This filing was made by a third party - tresslersoderstrom)

Carrie Cope, Attorney At Law ccope@tsmp.com  
 233 South Wacker Drive (312) 627-4188 [Phone]  
 Chicago, IL 60606-6399 (312) 627-1717[FAX]

### Filing Company Information

Allied World National Assurance Company CoCode: 10690 State of Domicile: New Hampshire  
 225 Franklin Street Group Code: 3239 Company Type:  
 Boston, MA 02110 Group Name: Allied World Ass. State ID Number:  
 Group  
 (857) 288-6000 ext. [Phone] FEIN Number: 02-0493244  
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## Filing Fees

Fee Required? Yes  
 Fee Amount: \$100.00  
 Retaliatory? No  
 Fee Explanation: The state of Arkansas assesses a \$100.00 fee for this Rate filing.  
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Allied World National Assurance Company	\$100.00	07/03/2008	21241578

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## Correspondence Summary

### Dispositions

Status	Created By	Created On	Date Submitted
Exempt from Review	Edith Roberts	07/09/2008	07/09/2008

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## Disposition

Disposition Date: 07/09/2008

Effective Date (New):

Effective Date (Renewal):

Status: Exempt from Review

Comment: Exempt under deregulation pursuant to AR Code Anno. 23-67-206.

Company Name:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Premium:	Maximum % Change (where required):	Minimum % Change (where required):	Overall % Indicated Change:
Allied World National Assurance Company	0.000%	\$0	0	\$0	0.000%	0.000%	0.000%

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Item Type	Item Name	Item Status	Public Access
Supporting Document	Uniform Transmittal Document-Property & Casualty	Accepted for Informational Purposes	Yes
Supporting Document	NAIC Loss Cost Filing Document for OTHER than Workers' Comp	Accepted for Informational Purposes	Yes
Supporting Document	NAIC loss cost data entry document	Accepted for Informational Purposes	Yes
Supporting Document	Authorization Letter	Accepted for Informational Purposes	Yes
Supporting Document	Cover Letter	Accepted for Informational Purposes	Yes
Rate	Private Company Management Liability: Coverage including Directors and Officers Insurance, Employment Practices Insurance and Fiduciary Liability Rating Plan	Accepted for Informational Purposes	Yes
Rate	Expense Component for the Private Management Liability	Accepted for Informational Purposes	Yes

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## Rate Information

Rate data applies to filing.

**Filing Method:** SERFF - New Program  
**Rate Change Type:** Neutral  
**Overall Percentage of Last Rate Revision:** 0.000%  
**Effective Date of Last Rate Revision:** 07/03/2008  
**Filing Method of Last Filing:** NONE

## Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Premium:	Maximum % Change (where required):	Minimum % Change (where required):
Allied World National Assurance Company	0.000%	0.000%	\$0	0	\$0	0.000%	0.000%

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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	Private Company Management Liability: Coverage including Directors and Officers Insurance, Employment Practices Insurance and Fiduciary Liability Rating Plan	0	New	AWNAC Private RANGE rating plan.pdf
Accepted for Informational Purposes	Expense Component for the Private Management Liability	0	New	AWNAC Private Expense Component.pdf

**Private Company Management Liability:**  
**Coverage including Directors and Officers Insurance, Employment Practices Insurance and Fiduciary Liability Rating Plan**

This policy will provide primary coverage in excess of retentions. The following rating practice will be utilized in the development of policy premium.

The annual premium is determined based upon the sum of the coverage parts.

$$\text{Annual Premium} = \text{D\&O} + \text{EPL} + \text{FL}$$

Coverage Sections are available to purchase on a stand alone basis as well as in conjunction with other Coverage Sections. The General Terms and Conditions section shall serve as the basis of the policy form and the Coverage Sections shall be included upon selection by the Company. In the event Coverage Sections are not purchased, such premium calculation shall not be included in the overall sum of the annual premium.

$\text{D\&O} = \text{D\&O Base premium} * \text{D\&O risk modifiers} * \text{limit of liability modifier} * \text{retention modifier}$

$\text{EPL} = \text{EPL Base premium} * \text{EPL risk modifiers} * \text{limit of liability modifier} * \text{retention modifier}$

$\text{FL} = \text{FL Base premium} * \text{FL risk modifiers} * \text{limit of liability modifier} * \text{retention modifier}$

Should the Company wish to purchase combined or shared limits of liability, a combined limit modifier will be applied to the coverage parts sharing the limit of liability. Those coverage parts shall be added to any additional coverage part(s) not combining the limits with any other coverage parts, and therefore has a separate limit of liability available to such liability. The overall maximum limit of liability shall be the total of the combined limits for shared Coverage Sections plus the separate limit for specified Coverage Sections

This rating plan does not contemplate any substantial shift in trends involving legal environment, loss severity or newly emerging exposures not previously contemplated in the pricing of the risk. In the event that the Insurer either experiences or witnesses such a shift in trends, the file shall be clearly documented to reflect the increased exposure detailing the trend observations and the judgments pricing utilized.

**D&O Premium Calculation**

The base premium for the first \$1mm of limits with \$25,000 retention will be determined on the basis of assets of the covered entity and its covered affiliates.

<b>Total Revenue</b>	<b>Base Rate</b>
Less than \$100,000	\$1,800
\$100,001 - \$250,000	\$2,000
\$251,000- \$500,000	\$2,200
\$500,001-\$1,000,000	\$2,500
\$1,000,001- \$2,000,000	\$3,500
\$2,000,001- \$3,000,000	\$4,000
\$3,000,001- \$4,000,000	\$4,400
\$4,000,001- \$5,000,000	\$4,700
\$5,000,001-\$7,500,000	\$5,350
\$7,500,001-\$10,000,000	\$6,000
\$10,000,001-\$15,000,000	\$7,000
\$15,000,001-\$20,000,000	\$8,000
\$20,000,001- \$30,000,000	\$9,000
\$30,000,001- \$40,000,000	\$10,000
\$40,000,001- \$50,000,000	\$11,000
\$50,000,001- \$75,000,000	\$13,000
\$75,000,001- \$100,000,000	\$16,500
\$100,000,001- \$125,000,000	\$17,500
\$125,000,001-\$150,000,000	\$18,500
\$150,000,001- \$175,000,000	\$19,500
\$175,000,001- \$200,000,000	\$20,500
\$200,000,001- \$300,000,000	\$21,000
\$300,000,001-\$400,000,000	\$22,000
\$400,000,001-\$500,000,000	\$23,000
\$500,000,001-\$750,000,000	\$24,000
\$750,000,001-\$1,000,000,000	\$25,000

**D&O Risk Modifiers**

<b><u>D&amp;O Risk Analysis</u></b> (each modifier should be underwritten separately and a risk factor should be applied to each risk characteristic)		<b><u>Factor</u></b>
Ownership Structure	- Insiders own all the shares - Insiders own majority of shares - Non-affiliated individuals and/or institutional investors own majority of shares	.75-.90 1.0-1.1 1.1-1.3
Number of years in business	- Greater than 10 years - 5 to 10 years - 2 to 5 years	.75- .90 .90-1.0 1.0-1.15

	- Less than 2 years	1.15-1.25
Quality of Management and Board Composition	- Excellent - Average - Below Average - Poor	.75-1.0 1.0-1.15 1.15-1.25 1.25-1.35
Offering of Securities: Private Placement or public exempt filings Activity	- None - Minimal - Material - Significant	1.0 1.0-1.15 1.15-1.3 1.3-1.5
Merger and Acquisition Strategy	- No activity in last two years - Limited Activity in last two years - Moderate Activity in last two years - Significant Activity	.85-1.0 1.0-1.10 1.1-1.25 1.25-1.75
Equity and debt structure	- Private Equity, Private Debt - Private Equity, Public debt	1.0 1.2-2.0
Financial Condition	Debt to Equity position - Below Average - Average - Above average  Earnings trend -Below Average - Average - Above average  Bank credit compliance - Below Average - Average - Above average	1.15 1.0 .9  1.15 1.0 .9  1.15 1.0 .9
Prior D&O Claim activity	- None in three years - Minimal (payment within suggested retention and less than policy limits) - Significant (payment above suggested retention and above policy limits)	.80-1.0 1.0-1.2 1.2-1.5

**Limit of Liability Modifier**

<b><u>Limit of Liability</u></b>	<b><u>Factor</u></b>
\$100,000	.550
\$250,000	.650
\$500,000	.825
\$750,000	.90
\$1,000,000	1.0
\$2,000,000	1.5
\$3,000,000	1.85
\$5,000,000	2.1

\$7,500,000	2.35
\$10,000,000	3.5

**Retention Modifier**

<b><u>Retention</u></b>	<b><u>Factor</u></b>
\$0	1.325
\$2500	1.300
\$5000	1.250
\$7500	1.200
\$10000	1.150
\$15,000	1.100
\$20,000	1.05
\$25,000	1.00
\$35,000	0.920
\$50,000	0.850
\$75,000	0.775
\$100,000	0.725
\$250,000	0.675
\$500,000	0.600

**EPL Premium Calculation**

The base premium for the first \$1mm of limits with \$25,000 retention will be determined on the basis of employee count of the covered entity and its covered affiliates. (Part time, seasonal, temporary, non-US based employees shall be counted as ½ employee.)

<b><u>Employee Count</u></b>	<b><u>Base Rate per employee</u></b>	<b><u>Cumulative Totals</u></b>
0- 25	\$ 2000 flat charge	2000
26-50	\$50	2000+1200= 3200
51- 150	\$35	3200+3465=6665
151-250	\$33	6665+3267=9932
251-350	\$32	9932+3168=13100
351-500	\$30	13100+4470=17570
501-1000	\$26	17570+12974=30544
1001-2000	\$24	30544+20975=51519
2001-5000	\$22	51519+65978=117497
5001-10000	\$20	117497+99980=217477

**EPL Risk Modifiers**

<b><u>EPL Risk Analysis (apply factor to each risk characteristic)</u></b>	<b><u>Factor</u></b>

Financial Condition	Profitable last three years -Yes -No  Debt to Equity position - Below Average - Average - Above average	.90-1.0 1.0-1.1  1.1 1.0 .9
Number of years in business	- Greater than 10 years - 5 to 10 years - 2 to 5 years - Less than 2 years	.75- .90 .90-1.0 1.0-1.15 1.15-1.35
Territorial Modifier	High Risk (California) High to Medium Risk (FL, NY Michigan, NJ, TX) Medium Risk (AL, AX, DC, IL, MA,MN, OR) Low Risk (All other States)	1.30 1.15  1.0 .90
Prior EPL Claim activity	- None in last three years - Minimal (claims reported but unlikely payout expected greater than retention) in last three years - Material (claims payout anticipated, overall severity less than policy limits) in last three years - Significant (payment exceeds suggested policy limits and retention) in last three years	1.0 1.0-1.1  1.1-1.3 1.3-1.5
Industry Modifier	Low -highly regulated, lower salaried employees, etc Medium- High- high salaried employees, specialists, complex pay packages etc	.8-1.0  1.0-1.15 1.15-1.5
Employee Turnover Rate and or Reductions in workforce	Less than 10% 10-20% 21%- 30% Greater than 30%	.85 .85-1.0 1.0-1.1 1.1-1.2
HR Practices and Policies	At Will statement - Yes - No Employee Handbook/Written Guidelines - Yes - No	1.0 1.2  .85-1.0 1.1-1.2

	<b>Annual Performance Reviews</b> - Yes - No <b>Employee Training for Harassment</b> - Yes - No  <b>Full Time HR Professional</b> - Yes - No	.9-1.0 1.0-1.1  .90-1.0 1.1-1.2  .85-1.0 1.0-1.1
<b>Merger and Acquisition Strategy</b>	- No activity in last two years - Limited Activity in last two years - Significant Activity	1.0 1.0-1.10 1.1-1.2

**Limit Of Liability Modifier**

<b><u>Limit of Liability</u></b>	<b><u>Factor</u></b>
\$100,000	.60
\$250,000	.65
\$500,000	.75
\$1,000,000	1.0
\$2,000,000	1.55
\$3,000,000	1.95
\$5,000,000	2.575
\$7,500,000	3.375
\$10,000,000	3.9

**Retention**

<b><u>Retention Modifiers</u></b>	<b><u>Factor</u></b>
\$2500	1.40
\$5000	1.325
\$7500	1.275
\$10000	1.225
\$15,000	1.150
\$20,000	1.05
\$25,000	1.00
\$35,000	.950
\$50,000	.900
\$75,000	.825
\$100,000	.775
\$250,000	.740
\$500,000	.715

**Third Party Coverage Modifier**

<u>Third Party Coverage **</u>		
	- No coverage	1.0
	- Third Party Exposure:	
	*Low- limited customer/vendor interaction	1.0-1.1
	*Medium- average customer/vendor interaction	1.05-1.20
	*High- high customer/vendor interaction	1.20-1.4

\*\*Interpolation should be used if sub-limits or modified retentions are applied.

**Fiduciary Liability Premium Calculation**

The base premium for the first \$1mm of limits with \$25,000 retention will be determined on the basis of plan assets of the covered entity and its covered affiliates.

<u>Total Plan Assets</u>	<u>Base Rate</u>
\$0-\$100,000	\$1000
\$100,000- \$500,000	\$1,250
\$500,005-\$1,000,000	\$1,500
\$1,000,001-\$2,000,000	\$1,850
\$2,000,001-\$3,000,000	\$2,100
\$3,000,001-\$4,000,000	\$2,450
\$4,000,001-\$5,000,000	\$2,800
\$5,000,001-\$7,500,000	\$3,100
\$7,500,001-\$10,000,000	\$3,800
\$10,000,001-\$12,500,000	\$4,100
\$12,500,001-\$15,000,000	\$4,200
\$15,000,001-\$20,000,000	\$4,400
\$20,000,001-\$30,000,000	\$5000
\$30,000,001-\$50,000,000	\$5,700
\$50,000,001-\$75,000,000	\$6,250
\$75,000,001-\$100,000,000	\$7,400
\$100,000,001-\$150,000,000	\$8,400
\$150,000,001-\$200,000,000	\$9,150
\$200,000,001-\$250,000,000	\$10,450
\$250,000,001-\$300,000,000	\$11,700
\$300,000,001-\$400,000,000	\$12,700
\$400,000,001-\$500,000,000	\$13,750
\$500,000,001-\$600,000,000	\$15,000
\$600,000,001-\$750,000,000	\$16,250
\$750,000,001-\$1,000,000,000	\$18,250

**Fiduciary Liability Risk Modifier**

<b>FL Risk Analysis</b>		<b>Factor</b>
Financial Condition of Company	Profitable last three years -Yes -No  Debt to Equity position - Below Average - Average - Above average	.90-1.0 1.0-1.1  1.1 1.0 .9
Type of Plan	- Welfare Only - Welfare and Defined Contribution - Welfare, Defined Contribution and Defined Benefit	.75-.90 1.0-1.15 1.1-1.25
Employee Stock Ownership Plan (ESOP)	- None - ESOP owns less than 50% of shares - ESOP owns more than 50% of shares	1.0 1.0-1.15 1.15-1.4
Funding Level	- Funding level requirements within 10% - Over Funded or under funded by >10% but <25% - Over funded or under funded by > 25%	1.0 1.0-1.15 1.15-1.25
Investment in Company Securities	- None - Minimal investments, employee discretion - Significant investments, employer directed	1.0 1.0-1.1 1.1-1.4
Investments	- Quality of Plan investments and diversification are above average - Quality of Plan investments and diversification are average - Quality of Plan investments and	.85-1.0  1.0  1.05-1.15

	diversification are below average	
Administrative Expenses	- Expenses greater than 3% - Expenses less than 3%	1.05-1.1 1.0
Benefits	- Plan benefits have been modified within the last two years or are in the process of being modified - Plan benefits have not been modified within the last two years or are not in the process of being modified	1.1-1.25 1.0
Third Party Administrator Coverage	- Yes - No	1.1-1.25 1.0
Prior EPL Claim activity	- None in last three years - Minimal (claims reported but unlikely payout expected greater than retention) in last three years - Material (claims payout anticipated, overall severity less than policy limits) in last three years - Significant (payment exceeds suggested policy limits and retention) in last three years	.80-1.0 1.0-1.1 1.1-1.2 1.2-1.4

**Limit of Liability Modifier**

<b><u>Limit of Liability</u></b>	<b><u>Factor</u></b>
\$100,000	.600
\$250,000	.650
\$500,000	.750
\$1,000,000	1.00
\$2,000,000	1.45
\$3,000,000	1.75
\$5,000,000	2.30
\$7,500,000	2.90
\$10,000,000	3.30

**Retention Modifier**

<b><u>Retention</u></b>	<b><u>Factor</u></b>
\$0	1.10
\$2500	1.05
\$5000	1.00
\$7500	.975
\$10000	.950
\$15,000	.915
\$20,000	.900
\$25,000	.885
\$35,000	.860
\$50,000	.835
\$75,000	.810
\$100,000	.780
\$250,000	.750
\$500,000	.725

**Other Coverage Modifiers:**

**Combined/Shared Limit of Liability Modifier**

Credit applied to the total premium of the Coverage Sections combining/sharing limits of liability

No Coverage Section combining or sharing limit of liability	0.0%
Two Coverage Sections combining or sharing limit of liability	.80
Three Coverage Sections combining or sharing limit of liability	.65

*All limit and retention tables for each Coverage Section allow for interpolation if intermediate values are needed. In the event further values are needed outside of the tables provided, extrapolation should be used to develop such values.*

**Expense Component for the  
Private Company Management Liability:  
Coverage including Directors and Officers Insurance, Employment Practices  
Insurance and Fiduciary Liability Rating Plan**

Expense Component	Note	
Commission	To the MGA	28.5%
Taxes, Licenses and Fees	Vary by state	3.0%
Other Acquisition		
General Expense	internal expense	4.0%
UW Profit & Contingencies		1.5%
Total		37.0%
Expected Loss and DCC		63.0%
LCM (excluding non-DCC LAE)		1.587

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## Supporting Document Schedules

**Review Status:**  
**Bypassed -Name:** Uniform Transmittal Document- Accepted for Informational 07/09/2008  
 Property & Casualty Purposes  
**Bypass Reason:** Not required when filing out Rate/Rule Schedule tab; See Rate/Rule Schedule tab.  
**Comments:**

**Review Status:**  
**Bypassed -Name:** NAIC Loss Cost Filing Document Accepted for Informational 07/09/2008  
 for OTHER than Workers' Comp Purposes  
**Bypass Reason:** N/A - Not applicable to this filing; new program.  
**Comments:**

**Review Status:**  
**Bypassed -Name:** NAIC loss cost data entry document Accepted for Informational 07/09/2008  
 Purposes  
**Bypass Reason:** N/A - Not applicable to this filing; new program.  
**Comments:**

**Review Status:**  
**Satisfied -Name:** Authorization Letter Accepted for Informational 07/09/2008  
 Purposes  
**Comments:**  
**Attachment:**  
 AWNAC Private Authorization Ltr.pdf

**Review Status:**  
**Satisfied -Name:** Cover Letter Accepted for Informational 07/09/2008  
 Purposes  
**Comments:**  
**Attachment:**  
 AR AWNAC Private Rates Cover Letter.pdf



**ALLIED WORLD NATIONAL ASSURANCE COMPANY**  
225 Franklin Street, Boston, MA 02110 • Tel. (857) 288-6000 • Fax (617) 556-8060

May 6, 2008

Re: Letter of Authorization for Tressler, Soderstrom, Maloney & Priess, LLP  
Resolute Portfolio for Private Companies

I, Al Fantuzzi, am a duly appointed authorized officer of Allied World National Assurance Company. This letter authorizes Tressler, Soderstrom, Maloney & Priess, LLP and Carrie E. Cope to file the above-referenced program on behalf of ALLIED WORLD NATIONAL ASSURANCE COMPANY, and to respond to any inquiries raised in connection with the filing of the program.

Please direct all inquiries and correspondence regarding this filing to:

Carrie E. Cope  
Tressler, Soderstrom, Maloney & Priess, LLP  
Sears Tower, 22<sup>nd</sup> Floor  
233 South Wacker Drive  
Chicago, IL 60606-6399

Phone: (312) 627-4188  
Email: [ccope@tsmp.com](mailto:ccope@tsmp.com)

Thank you for your assistance. Please contact me if you have any comments or questions regarding this authorization.

Sincerely Yours,

A handwritten signature in black ink, appearing to read 'Al Fantuzzi', with a long horizontal line extending to the right.

Al Fantuzzi  
Vice President



TRESSLER, SODERSTROM, MALONEY & PRIESS, LLP  
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July 3, 2008

**VIA SERFF**

Ms. Julie Benafield Bowman  
Commissioner of Insurance  
Arkansas Insurance Department  
Property & Casualty Division  
1200 West 3rd Street  
Little Rock, Arkansas 72201-1904

Re: Allied World National Assurance Company  
Resolute Portfolio<sup>SM</sup> For Private Companies  
Our filing no.: AWNAC-PRIVATE-AR-01 (R)  
NAIC: Group Code: 3239  
Company Code: 10690  
FEIN: 02-0493244  
**SERFF Tracking No.: TSMP-125716650**

Dear Ms. Bowman:

Tressler, Soderstrom, Maloney & Priess, LLP is submitting the above referenced Resolute Portfolio<sup>SM</sup> For Private Companies Program ("Program") for your review on behalf of Allied World National Assurance Company. This new Program offers the following types of commercial liability coverage to private companies: (1) directors and officers liability; (2) employment practices liability; and (3) fiduciary liability.

Enclosed please find the following documents in support of this filing:

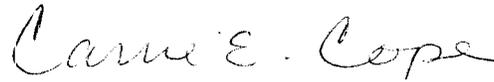
1. A letter authorizing Tressler, Soderstrom, Maloney & Priess, LLP to file this Program on behalf of Allied World National Assurance Company;
2. A Rating Plan which contains rates for use with the Resolute Portfolio<sup>SM</sup> For Private Companies Program; and
3. An Expense Component for use with the Resolute Portfolio<sup>SM</sup> For Private Companies Program.

Ms. Julie Benafield Bowman  
Commissioner of Insurance  
Arkansas Insurance Department  
July 3, 2008  
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Please note that we filed our form filing under separate cover on June 12, 2008. Our filing number for the form filing is AWNAC-PRIVATE-AR-01 (F), the SERFF tracking number is TSMP-125692194. In addition, we are submitting an electronic funds transfer in the amount of \$100.00 to cover the applicable fee for this Rate filing.

We trust that you will find this filing satisfactory. If you have any comments or questions regarding this filing, please do not hesitate to contact me. Thank you for your assistance.

Very truly yours,

A handwritten signature in cursive script that reads "Carrie E. Cope".

Carrie E. Cope

CEC/jmr  
Enclosures