Filing at a Glance

Company: Imperial Fire and Casualty

Product Name: Arkansas Summit	SERFF Tr Num: IFAC-125908713	State: Arkansas
TOI: 19.0 Personal Auto	SERFF Status: Closed	State Tr Num: EFT $100
Sub-TOI: 19.0001 Private Passenger Auto (PPA)	Co Tr Num: IFACAR20081215R	State Status: Fees verified and received
Filing Type: Rate/Rule	Co Status:	Reviewer(s): Alexa Grissom, Betty Montesi
	Author: Carrie Hewett	Disposition Date: 02/05/2009
	Date Submitted: 11/18/2008	Disposition Status: Filed
Effective Date Requested (New): 12/15/2008		Effective Date (New): 02/10/2009
Effective Date Requested (Renewal): 01/14/2009		Effective Date (Renewal):

State Filing Description:

General Information

Project Name: Arkansas Summit 12/15/08	Status of Filing in Domicile: Pending
Project Number: IFACAR20081215R	Domicile Status Comments:
Reference Organization:	Reference Number:
Reference Title:	Advisory Org. Circular:
Filing Status Changed: 02/05/2009	
State Status Changed: 12/01/2008	Deemer Date:
Corresponding Filing Tracking Number:	

Filing Description:

Imperial Fire & Casualty Insurance Company (Imperial) first introduced the Imperial Summit product on July 10, 2006. Since that time, it has become evident that the initial pricing was not adequate to maintain a profitable product. The rate level indication as of September 30, 2008 is +9.4%. Due to this, we are proposing an overall rate increase of 6.62% which consists of base rate, symbol, and tier factor changes. We are also adding a driver to vehicle ratio factor.

In addition, we are revising the limit on stated value vehicles from $100,000 to $60,000 in the rules.

We believe that our rates are adequate, not excessive, nor unfairly discriminatory, and that they are compliant with Arkansas law.

Company and Contact

Filing Contact Information

Carrie Hewett, Director of Product Management carrie.hewett@imperialfire.com
14800 Quorum Drive (214) 329-4059 [Phone]
Dallas, TX 75254 (972) 590-3228[FAX]

Filing Company Information

Imperial Fire and Casualty	CoCode: 44369	State of Domicile: Louisiana
14800 Quorum Drive	Group Code:	Company Type:
Suite 250		
Dallas, TX 75254	Group Name:	State ID Number:
(214) 329-4059 ext. [Phone]	FEIN Number: 75-2780871	

Filing Fees

Fee Required?	Yes
Fee Amount:	$100.00
Retaliatory?	No
Fee Explanation:	
Per Company:	No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Imperial Fire and Casualty	$100.00	11/18/2008	24006610

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Filed	Alexa Grissom	02/05/2009	02/05/2009

Objection Letters and Response Letters

Objection Letters				Response Letters		
Status	**Created By**	**Created On**	**Date Submitted**	**Responded By**	**Created On**	**Date Submitted**
Pending Industry Response	Alexa Grissom	01/27/2009	01/27/2009	Carrie Hewett	01/29/2009	01/29/2009
Pending Industry Response	Alexa Grissom	01/13/2009	01/13/2009	Carrie Hewett	01/19/2009	01/19/2009
Pending Industry Response	Alexa Grissom	01/06/2009	01/06/2009	Carrie Hewett	01/09/2009	01/09/2009
Pending Industry Response	Alexa Grissom	12/18/2008	12/18/2008	Carrie Hewett	12/29/2008	12/29/2008
Pending Industry Response	Alexa Grissom	12/09/2008	12/09/2008	Carrie Hewett	12/12/2008	12/12/2008
Pending Industry Response	Alexa Grissom	12/01/2008	12/01/2008	Carrie Hewett	12/04/2008	12/04/2008

Amendments

Item	Schedule	Created By	Created On	Date Submitted
Tier Loss Experience	Supporting Document	Carrie Hewett	01/20/2009	01/20/2009
Rate Tables - Base Rates	Rate	Carrie Hewett	11/18/2008	11/18/2008
Rate Tables - Symbols	Rate	Carrie Hewett	11/18/2008	11/18/2008
Rate Change Impact	Supporting Document	Carrie Hewett	11/18/2008	11/18/2008

Disposition

Disposition Date: 02/05/2009
Effective Date (New): 02/10/2009
Effective Date (Renewal):
Status: Filed
Comment:

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:**
Imperial Fire and Casualty	6.620%	$382,036	6,206	$5,770,937	%	%	9.400%

SERFF Tracking Number:	*IFAC-125908713*	*State:*	*Arkansas*
Filing Company:	*Imperial Fire and Casualty*	*State Tracking Number:*	*EFT $100*
Company Tracking Number:	*IFACAR20081215R*		
TOI:	*19.0 Personal Auto*	*Sub-TOI:*	*19.0001 Private Passenger Auto (PPA)*
Product Name:	*Arkansas Summit*		
Project Name/Number:	*Arkansas Summit 12/15/08/IFACAR20081215R*		

Item Type	Item Name	Item Status	Public Access
Supporting Document	A-1 Private Passenger Auto Abstract	Filed	Yes
Supporting Document *(revised)*	APCS-Auto Premium Comparison Survey	Filed	Yes
Supporting Document	APCS-Auto Premium Comparison Survey	Filed	No
Supporting Document	APCS-Auto Premium Comparison Survey	Filed	No
Supporting Document	APCS-Auto Premium Comparison Survey	Filed	No
Supporting Document *(revised)*	NAIC loss cost data entry document	Filed	Yes
Supporting Document	NAIC loss cost data entry document	Filed	No
Supporting Document	NAIC Loss Cost Filing Document for OTHER than Workers' Comp	Filed	Yes
Supporting Document	Uniform Transmittal Document-Property & Casualty	Filed	Yes
Supporting Document *(revised)*	Rate Change Impact	Filed	Yes
Supporting Document	Rate Level Indication	Filed	Yes
Supporting Document	Rate Change Impact	Filed	No
Supporting Document	Max Percent Change	Filed	Yes
Supporting Document	Tier Loss Experience	Filed	Yes
Rate	Rate Tables - Rate Order of Calculation	Filed	Yes
Rate *(revised)*	Rate Tables - Base Rates	Filed	Yes
Rate	Rate Tables - Base Rates	Filed	Yes
Rate	Rate Tables - Tier Factors	Filed	Yes
Rate *(revised)*	Rate Tables - Symbols	Filed	Yes
Rate	Rate Tables - Symbols	Filed	Yes
Rate	Rate Tables - Driver to Vehicle Ratio	Filed	Yes
Rate	Rules	Filed	Yes

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	01/27/2009
Submitted Date	01/27/2009
Respond By Date	

Dear Carrie Hewett,

This will acknowledge receipt of the captioned filing. Please send an updated APCS in excel with an updated effective date. Also, please provide us with a corrected RF-1 indicating the correct amount for a maximum increase. These abstracts will be on our web page.

Please feel free to contact me if you have questions.
Sincerely,
Alexa Grissom

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	01/29/2009
Submitted Date	01/29/2009

Dear Alexa Grissom,

Comments:

Response 1

Comments: Dear Ms Grissom,

I have attached an updated APCS in excel showing the revised effective date. I have also attached the RF-1 with the corrected maximum percent increase.

Please let me know if you need additional information.

Carrie Hewett

Changed Items:

Supporting Document Schedule Item Changes

Satisfied -Name: APCS-Auto Premium Comparison Survey

Comment:

Satisfied -Name: NAIC loss cost data entry document

Comment:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Sincerely,

Carrie Hewett

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	01/13/2009
Submitted Date	01/13/2009
Respond By Date	

Dear Carrie Hewett,

This will acknowledge receipt of the captioned filing. Please advise us of the premium amount for that policy and the factors that would create the 35 percent increase.

Please feel free to contact me if you have questions.
Sincerely,
Alexa Grissom

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	01/19/2009
Submitted Date	01/19/2009

Dear Alexa Grissom,

Comments:

Response 1

Comments: Dear Ms. Grissom,

Attached please find a new supporting document displaying the premium amount and the factors causing the rate increase for the policy in question. Please note that the actual percent increase is 29%. The prior calculation did not take some of the coverages into account such as PIP, UMBI, UIMBI, Rental & Towing.

Please contact me should you have questions.

Sincerely,

Carrie A. Hewett

SERFF Tracking Number:	*IFAC-125908713*	*State:*	*Arkansas*
Filing Company:	*Imperial Fire and Casualty*	*State Tracking Number:*	*EFT $100*
Company Tracking Number:	*IFACAR20081215R*		
TOI:	*19.0 Personal Auto*	*Sub-TOI:*	*19.0001 Private Passenger Auto (PPA)*
Product Name:	*Arkansas Summit*		
Project Name/Number:	*Arkansas Summit 12/15/08/IFACAR20081215R*		

Changed Items:

Supporting Document Schedule Item Changes

Satisfied -Name: Max Percent Change

Comment:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Sincerely,
Carrie Hewett

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	01/06/2009
Submitted Date	01/06/2009
Respond By Date	

Dear Carrie Hewett,

This will acknowledge receipt of the captioned filing. What would be the greatest rate change for an insured under this proposal?

Please feel free to contact me if you have questions.
Sincerely,
Alexa Grissom

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	01/09/2009
Submitted Date	01/09/2009

Dear Alexa Grissom,

Comments:

Response 1

Comments: Ms. Grissom,

We have identified a policy that will receive an increase of 35% under the current rate change proposal.

Sincerely,

Carrie A. Hewett

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Sincerely,
Carrie Hewett

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	12/18/2008
Submitted Date	12/18/2008
Respond By Date	

Dear Carrie Hewett,

This will acknowledge receipt of the captioned filing. Please provide us with detailed information regarding the insureds who you propose to increase the rate of up to 99 percent. What factors are involved and does you loss data justify such an increase?

Please feel free to contact me if you have questions.
Sincerely,
Alexa Grissom

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	12/29/2008
Submitted Date	12/29/2008

Dear Alexa Grissom,

Comments:

Response 1

Comments: Ms. Grissom,

When estimating the distribution of our book, I took the distribution of each rating variable individually and assumed a consistent distribution. This was an estimate of our current book.

We just searched our system for policies with a combination of the specific characteristics that I stated in previous correspondence (Tier 9A, Liability Symbol 325, Driver to Vehicle Ratio > 2.0), and we found that we actually have no policies on the books with that criteria.

Please let me know if I need to take any further action regarding this filing.

SERFF Tracking Number:	*IFAC-125908713*	*State:*	*Arkansas*
Filing Company:	*Imperial Fire and Casualty*	*State Tracking Number:*	*EFT $100*
Company Tracking Number:	*IFACAR20081215R*		
TOI:	*19.0 Personal Auto*	*Sub-TOI:*	*19.0001 Private Passenger Auto (PPA)*
Product Name:	*Arkansas Summit*		
Project Name/Number:	*Arkansas Summit 12/15/08/IFACAR20081215R*		

Thank You!

Carrie Hewett

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Sincerely,
Carrie Hewett

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	12/09/2008
Submitted Date	12/09/2008
Respond By Date	

Dear Carrie Hewett,

This will acknowledge receipt of the captioned filing. The effective date on the APCS is May 2008; please correct the date. Additionally, we would encourage a cap of around 20 percent for those insureds who would see dramatic increases such as the 90+ percent mentioned previously.

Please feel free to contact me if you have questions.
Sincerely,
Alexa Grissom

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	12/12/2008
Submitted Date	12/12/2008

Dear Alexa Grissom,

Comments:

Response 1

Comments: Dear Ms. Grissom,

I have revised the effective date on the APCS exhibit and have attched the corrected version. Also, Imperial is working to upgrade our system in order to allow rate capping, which is currently not a capability.

Sincerely,

Carrie A. Hewett

Changed Items:

Supporting Document Schedule Item Changes

Satisfied -Name: APCS-Auto Premium Comparison Survey

Comment:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Sincerely,

Carrie Hewett

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	12/01/2008
Submitted Date	12/01/2008
Respond By Date	

Dear Carrie Hewett,

This will acknowledge receipt of the captioned filing. Please advise what factors would produce a 99 percent rate increase for an insured as indicated on the RF-1. The APCS must be submitted in Excel. Per Regulation 23 Sec. 7(b), this filing may not be implemented until 20 days after all requested information is received.

Please feel free to contact me if you have questions.
Sincerely,
Alexa Grissom

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	12/04/2008
Submitted Date	12/04/2008

Dear Alexa Grissom,

Comments:

Response 1

Comments: Ms. Grissom,

The characteristics of a policy that would produce the maximum amount of increase would be one with credit tier 9A, a liability symbol of 325, and a driver to vehicle ratio greater than 2.0. Credit tier 9A represents a policyholder that has prior coverage with no lapse, prior liability limits of 100/300, and a credit score between 894 and 950. Examples of vehicles with a liability symbol of 325 are a Chevy Suburban, Ford F350, and a Lincoln Navigator. Examples of a driver to vehicle ratio greater than 2.0 would be a policy with 6 drivers and 2 vehicles, 9 drivers and 4 vehicles, or 7 drivers and 3 vehicles.

Please note that I have submitted a revised APCS document in Excel format.

Imperial wishes to revise the effective dates for this filing to 1/1/09 for new business and 1/20/09 for renewals.

Please advise if you have further questions.

Sincerely,

Carrie A. Hewett

Changed Items:

Supporting Document Schedule Item Changes
Satisfied -Name: APCS-Auto Premium Comparison Survey
Comment:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Sincerely,
Carrie Hewett

Amendment Letter

Amendment Date:

Submitted Date: 01/20/2009

Comments:

Dear Ms. Grissom,

I have attached an additional exhibit showing the loss experience of our tiers. The policy in question is in tier A which has a loss ratio of 94.36%.

As always, please let me know if you have additional questions or need further information.

Sincerely,

Carrie Hewett

Changed Items:

Supporting Document Schedule Item Changes:

User Added -Name: Tier Loss Experience

Comment:

23 DOI Request - Tier Experience.pdf

Amendment Letter

Amendment Date:

Submitted Date: 11/18/2008

Comments:

A typo was found in the liability symbol changes. Revised documents are being attached. The overall rate impact still remains 6.62%

Changed Items:

Rate/Rule Schedule Item Changes:

Exhibit Name:	**Rule # or Page #:**	**Rate Action:**	**Previous State Filing Numbers:**	**Attach Document:**
Rate Tables - Base Rates	Page 18	Replacement	Previous State Filing Num: 95446	12 Rate Tables-Base Rates.pdf
Exhibit Name:	**Rule # or Page #:**	**Rate Action:**	**Previous State Filing Numbers:**	**Attach Document:**
Rate Tables - Symbols	Page 37-40	Replacement	Previous State Filing Num: 95446	14 Rate Tables-Symbols.pdf

Supporting Document Schedule Item Changes:

User Added -Name: Rate Change Impact

Comment: Overall impact remains the same - shifting between base rates and symbols

6 Rate Impact-Overall.pdf

Rate Information

Rate data applies to filing.

Filing Method:	File & Use
Rate Change Type:	Increase
Overall Percentage of Last Rate Revision:	7.750%
Effective Date of Last Rate Revision:	05/15/2008
Filing Method of Last Filing:	File & Use

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):
Imperial Fire and Casualty	9.400%	6.620%	$382,036	6,206	$5,770,937	%	%

Rate/Rule Schedule

Review Status:	Exhibit Name:	Rule # or Page #:	Rate Action	Previous State Filing Number:	Attachments
Filed	Rate Tables - Rate Order of Calculation	Page 16	Replacement	95446	11 Rate Tables-ROC.pdf
Filed	Rate Tables - Base Rates	Page 18	Replacement	95446	12 Rate Tables-Base Rates.pdf
Filed	Rate Tables - Tier Factors	Page 33-34	Replacement	95446	8 Rate Impact-Tier Factors.pdf
Filed	Rate Tables - Symbols	Page 37-40	Replacement	95446	14 Rate Tables-Symbols.pdf
Filed	Rate Tables - Driver to Vehicle Ratio	Page 49	New		15 Rate Tables-Driver to Vehicle Ratio.pdf
Filed	Rules	Rule 44	Replacement	95446	16 Rule 44.pdf

Imperial Fire & Casualty
Rate Order of Calculation
Effective 12/15/08 New 01/14/09 Renewal

		BI	PD	OTC	COLL	PIP Med	PIP Dis	PIP Death	Loan / Lease	UMBI	UIMBI	UMPD	TOWING	RENTAL	Custom Equipment	Trailer OTC	Trailer Coll
Combined Driving Factor	X																
Household Structure	X																
Base Rate	X																
Tier Factor	X																
Territory Factor	X																
Year Model Factor	X																
Limits Factor	X																
Deductible Factor	X																
Symbol Factor	X																
Driver to Vehicle Ratio Factor	X																
Value Factor (1)	X																
Policy Discount Matrix Factor	X																
(1-Discount Factor) (2)	X																
(1+Surcharge Factor) (3)	X																
Term Factor	X																
Premium Total by Coverage (4)	=																
Total Premium, All Coverages	+																
Fees (Policy)	+																
Total Premium	=																

(1) Stated amount vehicles or trailers.
(2) Discount Factor = (Advance Quote-Years Clean-Companion Policy-EFT-Theft Discount factors)
(3) Surcharge Factor = (Business Use + Excluded Spouse/Parent + Ineligible Risk + SR22 Surcharge Factors)
Note, UMBI & UMPD have no SR22 Surcharge.
(4) Round to the nearest whole dollar
Round to the nearest 4 decimal places at each multiplicative step.

Grayed areas indicate that the factor will not apply to that specific coverage.

BASE RATES

	BI	PD	OTC	COLL	Loan/ Lease	PIP Med	Pip Dis	PIP Death	UMBI	UIMBI	UMPD	TOW	RENT	Custom Equipment	OTC Trailers	Coll Trailers
NEW	71.95	87.20	150.00	223.00	21.27	45.00	14.00	14.00	12.00	7.00	18.00	4.90	14.00	4.20	142.8	83.3
RENEWAL	71.95	87.20	150.00	223.00	21.27	45.00	14.00	14.00	12.00	7.00	18.00	4.90	14.00	4.20	142.8	83.3

Imperial Fire & Casualty Insurance Company
Private Passenger Automobile
Arkansas Summit
Rate Change Impact
New Business Effective 12/15/2008
Renewals Effective 01/14/2009

Tier Factors - All Coverages

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
1	A			84,526	31.9%
1	B			96,122	27.0%
1	C			191,467	19.8%
1	D			229,861	16.3%
1	E			318,920	11.5%
1	F			284,479	8.9%
1	G			379,101	7.1%
1	H			349,648	3.7%
1	I			242,652	0.1%
1	J			321,081	0.0%
1	K			353,472	-2.6%
1	L			349,837	-6.4%
1	M			265,918	-8.0%
1	N			236,163	-9.0%
1	O			170,218	-9.7%
1	P			140,648	-10.1%
1	Q			178,248	-12.0%
1	R			128,710	-17.3%
1	S			43,464	-16.2%
1	T1			8,846	-14.2%
1	T2			149,936	-11.1%
1	T3			13,291	-10.1%
1	T4			11,993	3.2%
1	U1			2,863	-14.1%
1	U2			5,554	-11.5%
1	U3			646	-12.4%
1	U4			632	3.5%
1	U5			128,058	-17.7%
2	A			9,639	35.5%
2	B			28,263	29.0%
2	C			35,997	22.2%
2	D			38,970	18.7%
2	E			54,409	14.0%
2	F			46,514	11.2%
2	G			57,138	9.6%
2	H			50,454	6.2%
2	I			41,151	2.6%
2	J			42,758	2.4%
2	K			47,555	0.0%
2	L			38,433	-3.8%
2	M			24,394	-5.4%
2	N			30,866	-6.7%
2	O			22,362	-7.2%
2	P			21,468	-7.6%
2	Q			25,199	-9.5%
2	R			20,101	-15.7%
2	S			4,586	-14.0%
2	T1			-	0.0%
2	T2			17,332	-8.5%
2	T3			1,852	-7.7%
2	T4			679	7.0%
2	U1			1,314	-9.8%
2	U2			385	-11.5%
2	U3			-	0.0%
2	U4			-	0.0%
2	U5			35,223	-15.3%
4	A			502	42.0%
4	B			3,737	35.3%
4	C			1,466	27.7%
4	D			2,896	23.9%
4	E			2,546	19.4%
4	F			1,221	16.9%
4	G			4,117	15.6%
4	H			598	15.0%

Tier Factors - BI & PD

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
1	A	0.9804	1.3134	57,835	34.0%
1	B	1.0260	1.3265	63,491	29.3%
1	C	1.1172	1.3396	126,462	19.9%
1	D	1.1628	1.3531	143,986	16.4%
1	E	1.2312	1.3661	203,497	11.0%
1	F	1.2654	1.3792	174,382	9.0%
1	G	1.3110	1.3925	234,550	6.2%
1	H	1.3680	1.4057	210,255	2.8%
1	I	1.4364	1.4190	147,966	-1.2%
1	J	1.4478	1.4321	195,072	-1.1%
1	K	1.5048	1.4453	233,308	-4.0%
1	L	1.5846	1.4585	222,491	-8.0%
1	M	1.6416	1.4717	153,828	-10.4%
1	N	1.6872	1.4849	135,571	-12.0%
1	O	1.7328	1.4981	96,362	-13.5%
1	P	1.7784	1.5114	74,088	-15.0%
1	Q	1.8354	1.5246	95,313	-16.9%
1	R	1.8924	1.5377	64,775	-18.7%
1	S	1.8924	1.5510	20,594	-18.0%
1	T1	1.8354	1.5246	6,322	-16.9%
1	T2	1.7784	1.5114	94,422	-15.0%
1	T3	1.7328	1.4981	9,161	-13.5%
1	T4	1.3680	1.4057	9,761	2.8%
1	U1	1.8354	1.5246	2,144	-16.9%
1	U2	1.7784	1.5114	3,827	-15.0%
1	U3	1.7328	1.4981	600	-13.5%
1	U4	1.3680	1.4057	339	2.8%
1	U5	1.8924	1.5377	84,506	-18.7%
2	A	0.7600	1.0600	6,249	39.5%
2	B	0.7900	1.0635	14,659	34.6%
2	C	0.8700	1.0862	18,056	24.9%
2	D	0.9000	1.0903	19,267	21.1%
2	E	0.9500	1.0975	27,296	15.5%
2	F	0.9800	1.1122	21,706	13.5%
2	G	1.0200	1.1281	29,277	10.6%
2	H	1.0600	1.1340	27,611	7.0%
2	I	1.1100	1.1416	20,920	2.8%
2	J	1.1200	1.1535	21,835	3.0%
2	K	1.1700	1.1700	25,234	0.0%
2	L	1.2300	1.1787	20,746	-4.2%
2	M	1.2800	1.1948	11,878	-6.7%
2	N	1.3100	1.2004	16,549	-8.4%
2	O	1.3500	1.2152	11,099	-10.0%
2	P	1.3800	1.2211	9,085	-11.5%
2	Q	1.4200	1.2280	12,031	-13.5%
2	R	1.4700	1.2436	8,242	-15.4%
2	S	1.4700	1.2543	1,469	-14.7%
2	T1	1.4200	1.2280	-	-13.5%
2	T2	1.3800	1.2211	9,416	-11.5%
2	T3	1.3500	1.2152	1,101	-10.0%
2	T4	1.0600	1.1340	644	7.0%
2	U1	1.4200	1.2280	416	-13.5%
2	U2	1.3800	1.2211	385	-11.5%
2	U3	1.3500	1.2152	-	-10.0%
2	U4	1.0600	1.1340	-	7.0%
2	U5	1.4700	1.2436	20,553	-15.4%
4	A	0.7000	1.0311	214	47.3%
4	B	0.7300	1.0377	1,639	42.2%
4	C	0.8000	1.0547	524	31.8%
4	D	0.8300	1.0618	997	27.9%
4	E	0.8800	1.0736	720	22.0%
4	F	0.9100	1.0906	419	19.8%
4	G	0.9400	1.0978	1,455	16.8%
4	H	0.9800	1.1072	304	13.0%

Tier Factors - All Coverages

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
4	I			2,201	7.8%
4	J			2,092	8.2%
4	K			1,057	5.2%
4	L			862	3.7%
4	M			1,362	0.4%
4	N			352	1.1%
4	O			-	0.0%
4	P			-	0.0%
4	Q			329	-1.0%
4	R			-	0.0%
4	S			-	0.0%
4	T1			-	0.0%
4	T2			-	0.0%
4	T3			-	0.0%
4	T4			-	0.0%
4	U1			-	0.0%
4	U2			-	0.0%
4	U3			-	0.0%
4	U4			-	0.0%
4	U5			201	-11.1%
5	A			120	42.4%
5	B			1,445	35.4%
5	C			1,180	31.0%
5	D			585	26.6%
5	E			857	22.2%
5	F			-	0.0%
5	G			836	19.2%
5	H			2,048	14.5%
5	I			-	0.0%
5	J			372	10.4%
5	K			750	7.3%
5	L			-	0.0%
5	M			-	0.0%
5	N			1,546	0.9%
5	O			-	0.0%
5	P			-	0.0%
5	Q			-	0.0%
5	R			-	0.0%
5	S			-	0.0%
5	T1			-	0.0%
5	T2			-	0.0%
5	T3			-	0.0%
5	T4			-	0.0%
5	U1			-	0.0%
5	U2			-	0.0%
5	U3			-	0.0%
5	U4			-	0.0%
5	U5			97	-9.3%
6	A			144,413	34.3%
6	B			219,871	29.1%
6	C			322,059	22.6%
6	D			304,985	18.7%
6	E			400,561	14.1%
6	F			303,841	11.4%
6	G			451,384	9.6%
6	H			370,143	6.1%
6	I			261,151	2.5%
6	J			301,823	2.3%
6	K			297,484	0.0%
6	L			277,987	-3.8%
6	M			178,477	-5.6%
6	N			177,367	-6.6%
6	O			138,069	-7.2%
6	P			126,931	-7.4%

Tier Factors - BI & PD

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
4	I	1.0300	1.1188	744	8.6%
4	J	1.0400	1.1311	684	8.8%
4	K	1.0800	1.1405	352	5.6%
4	L	1.1400	1.1537	322	1.2%
4	M	1.1800	1.1632	474	-1.4%
4	N	1.2100	1.1709	85	-3.2%
4	O	1.2500	1.1881		-5.0%
4	P	1.2800	1.1961		-6.6%
4	Q	1.3200	1.2055	74	-8.7%
4	R	1.3600	1.2150		-10.7%
4	S	1.3600	1.2255		-9.9%
4	T1	1.3200	1.2055		-8.7%
4	T2	1.2800	1.1961		-6.6%
4	T3	1.2500	1.1881		-5.0%
4	T4	0.9800	1.1072		13.0%
4	U1	1.3200	1.2055		-8.7%
4	U2	1.2800	1.1961		-6.6%
4	U3	1.2500	1.1881		-5.0%
4	U4	0.9800	1.1072		13.0%
4	U5	1.3600	1.2150	141	-10.7%
5	A	0.6500	0.9723	81	49.6%
5	B	0.6700	0.9674	509	44.4%
5	C	0.7400	0.9909	368	33.9%
5	D	0.7600	0.9876	167	29.9%
5	E	0.8100	1.0037	301	23.9%
5	F	0.8300	1.0104		21.7%
5	G	0.8700	1.0320	739	18.6%
5	H	0.9000	1.0328	641	14.8%
5	I	0.9500	1.0480		10.3%
5	J	0.9600	1.0605	154	10.5%
5	K	0.9900	1.0618	224	7.3%
5	L	1.0500	1.0793		2.8%
5	M	1.0800	1.0813		0.1%
5	N	1.1100	1.0909	743	-1.7%
5	O	1.1500	1.1102		-3.5%
5	P	1.1700	1.1104		-5.1%
5	Q	1.2100	1.1224		-7.2%
5	R	1.2500	1.1342		-9.3%
5	S	1.2500	1.1441		-8.5%
5	T1	1.2100	1.1224		-7.2%
5	T2	1.1700	1.1104		-5.1%
5	T3	1.1500	1.1102		-3.5%
5	T4	0.9000	1.0328		14.8%
5	U1	1.2100	1.1224		-7.2%
5	U2	1.1700	1.1104		-5.1%
5	U3	1.1500	1.1102		-3.5%
5	U4	0.9000	1.0328		14.8%
5	U5	1.2500	1.1342	97	-9.3%
6	A	0.7600	1.0600	83,700	39.5%
6	B	0.7900	1.0635	115,950	34.6%
6	C	0.8700	1.0862	172,901	24.9%
6	D	0.9000	1.0903	154,547	21.1%
6	E	0.9500	1.0975	205,771	15.5%
6	F	0.9800	1.1122	158,332	13.5%
6	G	1.0200	1.1281	227,166	10.6%
6	H	1.0600	1.1340	173,185	7.0%
6	I	1.1100	1.1416	131,024	2.8%
6	J	1.1200	1.1535	146,228	3.0%
6	K	1.1700	1.1700	160,904	0.0%
6	L	1.2300	1.1787	154,387	-4.2%
6	M	1.2800	1.1948	86,766	-6.7%
6	N	1.3100	1.2004	87,011	-8.4%
6	O	1.3500	1.2152	68,827	-10.0%
6	P	1.3800	1.2211	55,018	-11.5%

Tier Factors - All Coverages

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
6	Q			122,999	-9.2%
6	R			119,121	-15.6%
6	S			35,723	-14.4%
6	T1			2,903	-12.2%
6	T2			117,644	-8.5%
6	T3			13,207	-7.6%
6	T4			18,186	6.0%
6	U1			3,776	-9.8%
6	U2			7,648	-8.7%
6	U3			930	-9.9%
6	U4			1,676	6.3%
6	U5			110,905	-15.4%
8	A			31,195	25.3%
8	B			35,142	21.1%
8	C			24,614	15.6%
8	D			12,837	12.5%
8	E			28,866	8.4%
8	F			13,026	5.6%
8	G			25,159	4.4%
8	H			9,728	1.5%
8	I			18,280	-1.9%
8	J			11,233	-2.0%
8	K			6,164	-4.8%
8	L			3,940	-8.4%
8	M			10,402	-9.2%
8	N			2,220	-10.9%
8	O			1,656	-9.8%
8	P			2,622	-10.9%
8	Q			3,505	-12.7%
8	R			(590)	-19.3%
8	S			-	0.0%
8	T1			-	0.0%
8	T2			1,792	-10.9%
8	T3			-	0.0%
8	T4			4,867	0.9%
8	U1			-	0.0%
8	U2			-	0.0%
8	U3			-	0.0%
8	U4			-	0.0%
8	U5			1,519	-18.7%
9	A			24,087	37.1%
9	B			30,392	33.4%
9	C			16,712	26.7%
9	D			25,560	23.4%
9	E			18,102	19.3%
9	F			10,676	15.7%
9	G			5,937	14.6%
9	H			5,635	11.4%
9	I			7,280	7.8%
9	J			6,508	7.6%
9	K			5,641	4.1%
9	L			1,262	1.3%
9	M			2,259	-0.2%
9	N			478	-4.1%
9	O			1,148	-1.8%
9	P			-	0.0%
9	Q			-	0.0%
9	R			1,307	-10.6%
9	S			-	0.0%
9	T1			-	0.0%
9	T2			691	0.1%
9	T3			-	0.0%
9	T4			2,435	11.7%
9	U1			-	0.0%
9	U2			-	0.0%
9	U3			-	0.0%
9	U4			-	0.0%
9	U5			1,347	-11.3%
Error	Error			(2,665)	0.0%
Total				10,662,997	4.0%

Tier Factors - BI & PD

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
6	Q	1.4200	1.2280	57,672	-13.5%
6	R	1.4700	1.2436	49,243	-15.4%
6	S	1.4700	1.2543	12,611	-14.7%
6	T1	1.4200	1.2280	2,671	-13.5%
6	T2	1.3800	1.2211	67,526	-11.5%
6	T3	1.3500	1.2152	7,707	-10.0%
6	T4	1.0600	1.1340	9,645	7.0%
6	U1	1.4200	1.2280	1,660	-13.5%
6	U2	1.3800	1.2211	4,393	-11.5%
6	U3	1.3500	1.2152	924	-10.0%
6	U4	1.0600	1.1340	1,255	7.0%
6	U5	1.4700	1.2436	66,309	-15.4%
8	A	0.6500	0.8478	14,454	30.4%
8	B	0.6700	0.8435	13,597	25.9%
8	C	0.7400	0.8639	11,670	16.7%
8	D	0.7600	0.8610	4,651	13.3%
8	E	0.8100	0.8750	9,247	8.0%
8	F	0.8300	0.8809	5,515	6.1%
8	G	0.8700	0.8999	9,021	3.4%
8	H	0.9000	0.9004	3,973	0.0%
8	I	0.9500	0.9137	7,251	-3.8%
8	J	0.9600	0.9247	3,902	-3.7%
8	K	0.9900	0.9258	2,152	-6.5%
8	L	1.0500	0.9410	1,907	-10.4%
8	M	1.0800	0.9427	3,806	-12.7%
8	N	1.1100	0.9512	1,165	-14.3%
8	O	1.1500	0.9681	464	-15.8%
8	P	1.1700	0.9682	992	-17.2%
8	Q	1.2100	0.9786	1,401	-19.1%
8	R	1.2500	0.9889	(230)	-20.9%
8	S	1.2500	0.9975		-20.2%
8	T1	1.2100	0.9786		-19.1%
8	T2	1.1700	0.9682	695	-17.2%
8	T3	1.1500	0.9681		-15.8%
8	T4	0.9000	0.9004	3,905	0.0%
8	U1	1.2100	0.9786		-19.1%
8	U2	1.1700	0.9682		-17.2%
8	U3	1.1500	0.9681		-15.8%
8	U4	0.9000	0.9004		0.0%
8	U5	1.2500	0.9889	389	-20.9%
9	A	0.5800	0.8395	10,080	44.7%
9	B	0.6100	0.8522	12,762	39.7%
9	C	0.6600	0.8552	6,228	29.6%
9	D	0.6900	0.8675	9,630	25.7%
9	E	0.7300	0.8751	7,277	19.9%
9	F	0.7500	0.8834	4,029	17.8%
9	G	0.7800	0.8953	2,722	14.8%
9	H	0.8100	0.8993	1,923	11.0%
9	I	0.8500	0.9073	2,334	6.7%
9	J	0.8600	0.9193	2,606	6.9%
9	K	0.9000	0.9340	2,902	3.8%
9	L	0.9400	0.9348	531	-0.5%
9	M	0.9800	0.9493	724	-3.1%
9	N	1.0000	0.9510	438	-4.9%
9	O	1.0300	0.9622	509	-6.6%
9	P	1.0600	0.9734		-8.2%
9	Q	1.0900	0.9783		-10.2%
9	R	1.1200	0.9833	383	-12.2%
9	S	1.1200	0.9918		-11.4%
9	T1	1.0900	0.9783		-10.2%
9	T2	1.0600	0.9734	161	-8.2%
9	T3	1.0300	0.9622		-6.6%
9	T4	0.8100	0.8993	1,143	11.0%
9	U1	1.0900	0.9783		-10.2%
9	U2	1.0600	0.9734		-8.2%
9	U3	1.0300	0.9622		-6.6%
9	U4	0.8100	0.8993		11.0%
9	U5	1.1200	0.9833	583	-12.2%
Error	Error			(1,391)	
Total				5,862,638	3.7%

Tier Factors - PIP/UMBI

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
1	A	0.7182	0.8172	2,350	13.8%
1	B	0.7524	0.9013	2,638	19.8%
1	C	0.8436	0.9855	5,886	16.8%
1	D	0.9120	1.0697	6,381	17.3%
1	E	0.9804	1.1540	8,761	17.7%
1	F	1.0944	1.2380	6,143	13.1%
1	G	1.1628	1.3222	9,477	13.7%
1	H	1.2084	1.4064	9,398	16.4%
1	I	1.3680	1.4906	6,569	9.0%
1	J	1.4364	1.5749	7,332	9.6%
1	K	1.7214	1.6589	7,351	-3.6%
1	L	1.7442	1.7431	7,196	-0.1%
1	M	1.7784	1.8273	5,324	2.8%
1	N	1.8240	1.9114	5,223	4.8%
1	O	1.8810	1.9957	3,608	6.1%
1	P	1.9152	2.0798	3,592	8.6%
1	Q	1.9380	2.1640	3,697	11.7%
1	R	2.4624	2.2481	3,387	-8.7%
1	S	2.4624	2.3323	804	-5.3%
1	T1	1.9380	2.1640	63	11.7%
1	T2	1.9152	2.0798	3,565	8.6%
1	T3	1.8810	1.9957	934	6.1%
1	T4	1.2084	1.4064	191	16.4%
1	U1	1.9380	2.1640	80	11.7%
1	U2	1.9152	2.0798	215	8.6%
1	U3	1.8810	1.9957	35	6.1%
1	U4	1.2084	1.4064	2	16.4%
1	U5	2.4624	2.2481	2,439	-8.7%
2	A	0.5800	0.6848	183	18.1%
2	B	0.6100	0.7582	1,057	24.3%
2	C	0.6900	0.8364	1,374	21.2%
2	D	0.7400	0.9006	1,803	21.7%
2	E	0.7900	0.9649	1,950	22.1%
2	F	0.8800	1.0329	2,049	17.4%
2	G	0.9400	1.1091	1,587	18.0%
2	H	0.9800	1.1835	1,523	20.8%
2	I	1.1100	1.2550	1,432	13.1%
2	J	1.1700	1.3311	1,495	13.8%
2	K	1.4000	1.4000	1,824	0.0%
2	L	1.4200	1.4726	1,136	3.7%
2	M	1.4400	1.5353	987	6.6%
2	N	1.4800	1.6093	838	8.7%
2	O	1.5300	1.6844	558	10.1%
2	P	1.5500	1.7466	515	12.7%
2	Q	1.5700	1.8191	785	15.9%
2	R	1.9900	1.8852	408	-5.3%
2	S	1.9900	1.9558	260	-1.7%
2	T1	1.5700	1.8191	-	15.9%
2	T2	1.5500	1.7466	286	12.7%
2	T3	1.5300	1.6844	74	10.1%
2	T4	0.9800	1.1835	6	20.8%
2	U1	1.5700	1.8191	-	15.9%
2	U2	1.5500	1.7466	-	12.7%
2	U3	1.5300	1.6844	-	10.1%
2	U4	0.9800	1.1835	-	20.8%
2	U5	1.9900	1.8852	1,299	-5.3%
4	A	0.5300	0.6563	13	23.8%
4	B	0.5600	0.7300	360	30.4%
4	C	0.6300	0.8009	133	27.1%
4	D	0.6800	0.8679	318	27.6%
4	E	0.7300	0.9352	214	28.1%
4	F	0.8100	0.9971	60	23.1%
4	G	0.8700	1.0766	359	23.7%
4	H	0.9000	1.1400	141	26.7%

Tier Factors - OTC/LL

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
1	A	0.9804	1.1401	4,570	16.3%
1	B	1.0488	1.1876	6,017	13.2%
1	C	1.0716	1.2350	12,098	15.2%
1	D	1.1172	1.2827	15,978	14.8%
1	E	1.1856	1.3302	21,466	12.2%
1	F	1.2426	1.3778	20,864	10.9%
1	G	1.2996	1.4252	28,835	9.7%
1	H	1.3680	1.4728	26,414	7.7%
1	I	1.4706	1.5202	18,573	3.4%
1	J	1.5048	1.5679	27,019	4.2%
1	K	1.6188	1.6154	25,577	-0.2%
1	L	1.7214	1.6628	27,354	-3.4%
1	M	1.7670	1.7106	24,056	-3.2%
1	N	1.8126	1.7581	21,070	-3.0%
1	O	1.8354	1.8055	15,893	-1.6%
1	P	1.8924	1.8531	14,423	-2.1%
1	Q	1.9608	1.9006	18,556	-3.1%
1	R	2.3370	1.9481	14,527	-16.6%
1	S	2.3370	1.9956	4,958	-14.6%
1	T1	1.9608	1.9006	423	-3.1%
1	T2	1.8924	1.8531	12,030	-2.1%
1	T3	1.8354	1.8055	775	-1.6%
1	T4	1.3680	1.4728	382	7.7%
1	U1	1.9608	1.9006	74	-3.1%
1	U2	1.8924	1.8531	368	-2.1%
1	U3	1.8354	1.8055		-1.6%
1	U4	1.3680	1.4728	56	7.7%
1	U5	2.3370	1.9481	10,401	-16.6%
2	A	0.7700	0.8973	548	16.5%
2	B	0.8200	0.9305	2,357	13.5%
2	C	0.8300	0.9586	3,319	15.5%
2	D	0.8800	1.0125	3,532	15.1%
2	E	0.9300	1.0456	5,070	12.4%
2	F	0.9700	1.0778	4,623	11.1%
2	G	1.0200	1.1210	6,062	9.9%
2	H	1.0600	1.1435	4,620	7.9%
2	I	1.1400	1.1809	3,953	3.6%
2	J	1.1700	1.2216	4,018	4.4%
2	K	1.2600	1.2600	5,070	0.0%
2	L	1.3500	1.3068	3,927	-3.2%
2	M	1.3800	1.3388	2,625	-3.0%
2	N	1.4100	1.3705	3,374	-2.8%
2	O	1.4300	1.4097	2,661	-1.4%
2	P	1.4800	1.4523	2,628	-1.9%
2	Q	1.5300	1.4862	2,792	-2.9%
2	R	1.8200	1.5203	2,556	-16.5%
2	S	1.8200	1.5574	780	-14.4%
2	T1	1.5300	1.4862		-2.9%
2	T2	1.4800	1.4523	1,497	-1.9%
2	T3	1.4300	1.4097	105	-1.4%
2	T4	1.0600	1.1435	2	7.9%
2	U1	1.5300	1.4862	111	-2.9%
2	U2	1.4800	1.4523		-1.9%
2	U3	1.4300	1.4097		-1.4%
2	U4	1.0600	1.1435		7.9%
2	U5	1.8200	1.5203	3,315	-16.5%
4	A	0.7200	0.8667	15	20.4%
4	B	0.8000	0.9378	388	17.2%
4	C	0.8100	0.9666	182	19.3%
4	D	0.8500	1.0104	299	18.9%
4	E	0.9000	1.0453	330	16.1%
4	F	0.9500	1.0906	200	14.8%
4	G	0.9900	1.1241	375	13.5%
4	H	1.0300	1.1480	22	11.5%

Tier Factors - PIP/UMBI

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
4	I	1.0200	1.2094	65	18.6%
4	J	1.0700	1.2768	156	19.3%
4	K	1.2800	1.3425	159	4.9%
4	L	1.3000	1.4138	282	8.8%
4	M	1.3200	1.4760	108	11.8%
4	N	1.3600	1.5511	55	14.0%
4	O	1.4000	1.6165	-	15.5%
4	P	1.4200	1.6782	-	18.2%
4	Q	1.4400	1.7499	36	21.5%
4	R	1.8300	1.8183	-	-0.6%
4	S	1.8300	1.8863	-	3.1%
4	T1	1.4400	1.7499	-	21.5%
4	T2	1.4200	1.6782	-	18.2%
4	T3	1.4000	1.6165	-	15.5%
4	T4	0.9000	1.1400	-	26.7%
4	U1	1.4400	1.7499	-	21.5%
4	U2	1.4200	1.6782	-	18.2%
4	U3	1.4000	1.6165	-	15.5%
4	U4	0.9000	1.1400	-	26.7%
4	U5	1.8300	1.8183	-	-0.6%
5	A	0.4900	0.6112	34	24.7%
5	B	0.5100	0.6697	121	31.3%
5	C	0.5800	0.7428	145	28.1%
5	D	0.6300	0.8100	24	28.6%
5	E	0.6700	0.8645	110	29.0%
5	F	0.7400	0.9176		24.0%
5	G	0.8000	0.9971	85	24.6%
5	H	0.8300	1.0589	154	27.6%
5	I	0.9400	1.1228		19.4%
5	J	0.9800	1.1779	13	20.2%
5	K	1.1800	1.2466	135	5.6%
5	L	1.2000	1.3146		9.5%
5	M	1.2100	1.3629		12.6%
5	N	1.2500	1.4360	68	14.9%
5	O	1.2900	1.5003		16.3%
5	P	1.3100	1.5595		19.0%
5	Q	1.3200	1.6157		22.4%
5	R	1.6800	1.6813		0.1%
5	S	1.6800	1.7442		3.8%
5	T1	1.3200	1.6157		22.4%
5	T2	1.3100	1.5595		19.0%
5	T3	1.2900	1.5003		16.3%
5	T4	0.8300	1.0589		27.6%
5	U1	1.3200	1.6157		22.4%
5	U2	1.3100	1.5595		19.0%
5	U3	1.2900	1.5003		16.3%
5	U4	0.8300	1.0589		27.6%
5	U5	1.6800	1.6813		0.1%
6	A	0.5800	0.6848	6,094	18.1%
6	B	0.6100	0.7582	8,704	24.3%
6	C	0.6900	0.8364	13,638	21.2%
6	D	0.7400	0.9006	12,789	21.7%
6	E	0.7900	0.9649	16,007	22.1%
6	F	0.8800	1.0329	13,113	17.4%
6	G	0.9400	1.1091	17,343	18.0%
6	H	0.9800	1.1835	12,974	20.8%
6	I	1.1100	1.2550	9,131	13.1%
6	J	1.1700	1.3311	9,283	13.8%
6	K	1.4000	1.4000	11,662	0.0%
6	L	1.4200	1.4726	7,971	3.7%
6	M	1.4400	1.5353	5,714	6.6%
6	N	1.4800	1.6093	5,218	8.7%
6	O	1.5300	1.6844	4,318	10.1%
6	P	1.5500	1.7466	5,021	12.7%

Tier Factors - OTC/LL

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
4	I	1.1100	1.1879	271	7.0%
4	J	1.1400	1.2297	279	7.9%
4	K	1.2300	1.2708	106	3.3%
4	L	1.3100	1.3101	49	0.0%
4	M	1.3400	1.3431	197	0.2%
4	N	1.3700	1.3758	45	0.4%
4	O	1.3900	1.4156		1.8%
4	P	1.4400	1.4598		1.4%
4	Q	1.4900	1.4953	57	0.4%
4	R	1.7700	1.5275		-13.7%
4	S	1.7700	1.5648		-11.6%
4	T1	1.4900	1.4953		0.4%
4	T2	1.4400	1.4598		1.4%
4	T3	1.3900	1.4156		1.8%
4	T4	1.0300	1.1480		11.5%
4	U1	1.4900	1.4953		0.4%
4	U2	1.4400	1.4598		1.4%
4	U3	1.3900	1.4156		1.8%
4	U4	1.0300	1.1480		11.5%
4	U5	1.7700	1.5275	20	-13.7%
5	A	0.6900	0.8506		23.3%
5	B	0.7400	0.8883	136	20.0%
5	C	0.7500	0.9163	160	22.2%
5	D	0.7900	0.9616	26	21.7%
5	E	0.8300	0.9871	106	18.9%
5	F	0.8700	1.0226		17.5%
5	G	0.9100	1.0579		16.3%
5	H	0.9500	1.0842	195	14.1%
5	I	1.0300	1.1286		9.6%
5	J	1.0500	1.1598	50	10.5%
5	K	1.1300	1.1954	73	5.8%
5	L	1.2100	1.2391		2.4%
5	M	1.2400	1.2726		2.6%
5	N	1.2700	1.3059	119	2.8%
5	O	1.2900	1.3452		4.3%
5	P	1.3200	1.3702		3.8%
5	Q	1.3700	1.4078		2.8%
5	R	1.6400	1.4493		-11.6%
5	S	1.6400	1.4846		-9.5%
5	T1	1.3700	1.4078		2.8%
5	T2	1.3200	1.3702		3.8%
5	T3	1.2900	1.3452		4.3%
5	T4	0.9500	1.0842		14.1%
5	U1	1.3700	1.4078		2.8%
5	U2	1.3200	1.3702		3.8%
5	U3	1.2900	1.3452		4.3%
5	U4	0.9500	1.0842		14.1%
5	U5	1.6400	1.4493		-11.6%
6	A	0.7700	0.8973	10,469	16.5%
6	B	0.8200	0.9305	17,592	13.5%
6	C	0.8300	0.9586	25,713	15.5%
6	D	0.8800	1.0125	26,363	15.1%
6	E	0.9300	1.0456	34,268	12.4%
6	F	0.9700	1.0778	25,939	11.1%
6	G	1.0200	1.1210	41,387	9.9%
6	H	1.0600	1.1435	38,340	7.9%
6	I	1.1400	1.1809	24,997	3.6%
6	J	1.1700	1.2216	29,571	4.4%
6	K	1.2600	1.2600	27,574	0.0%
6	L	1.3500	1.3068	23,940	-3.2%
6	M	1.3800	1.3388	19,353	-3.0%
6	N	1.4100	1.3705	18,468	-2.8%
6	O	1.4300	1.4097	13,289	-1.4%
6	P	1.4800	1.4523	13,950	-1.9%

Tier Factors - PIP/UMBI

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
6	Q	1.5700	1.8191	5,288	15.9%
6	R	1.9900	1.8852	2,619	-5.3%
6	S	1.9900	1.9558	1,190	-1.7%
6	T1	1.5700	1.8191	112	15.9%
6	T2	1.5500	1.7466	2,914	12.7%
6	T3	1.5300	1.6844	482	10.1%
6	T4	0.9800	1.1835	421	20.8%
6	U1	1.5700	1.8191	40	15.9%
6	U2	1.5500	1.7466	109	12.7%
6	U3	1.5300	1.6844	4	10.1%
6	U4	0.9800	1.1835	4	20.8%
6	U5	1.9900	1.8852	3,278	-5.3%
8	A	0.4900	0.5125	3,181	4.6%
8	B	0.5100	0.5616	3,261	10.1%
8	C	0.5800	0.6227	2,758	7.4%
8	D	0.6300	0.6792	1,350	7.8%
8	E	0.6700	0.7248	2,445	8.2%
8	F	0.7400	0.7694	1,469	4.0%
8	G	0.8000	0.8360	2,382	4.5%
8	H	0.8300	0.8879	884	7.0%
8	I	0.9400	0.9413	1,696	0.1%
8	J	0.9800	0.9877	1,066	0.8%
8	K	1.1800	1.0452	700	-11.4%
8	L	1.2000	1.1022	449	-8.1%
8	M	1.2100	1.1427	975	-5.6%
8	N	1.2500	1.2040	270	-3.7%
8	O	1.2900	1.2580	72	-2.5%
8	P	1.3100	1.3075	133	-0.2%
8	Q	1.3200	1.3547	195	2.6%
8	R	1.6800	1.4098	(19)	-16.1%
8	S	1.6800	1.4625		-12.9%
8	T1	1.3200	1.3547		2.6%
8	T2	1.3100	1.3075	125	-0.2%
8	T3	1.2900	1.2580		-2.5%
8	T4	0.8300	0.8879	513	7.0%
8	U1	1.3200	1.3547		2.6%
8	U2	1.3100	1.3075		-0.2%
8	U3	1.2900	1.2580		-2.5%
8	U4	0.8300	0.8879		7.0%
8	U5	1.6800	1.4098	205	-16.1%
9	A	0.4500	0.5143	2,619	14.3%
9	B	0.4700	0.5654	3,064	20.3%
9	C	0.5300	0.6217	1,834	17.3%
9	D	0.5700	0.6713	2,584	17.8%
9	E	0.6100	0.7211	1,488	18.2%
9	F	0.6800	0.7724	1,407	13.6%
9	G	0.7300	0.8336	743	14.2%
9	H	0.7600	0.8883	474	16.9%
9	I	0.8600	0.9409	894	9.4%
9	J	0.9000	0.9909	395	10.1%
9	K	1.0800	1.0452	662	-3.2%
9	L	1.0900	1.0940	107	0.4%
9	M	1.1100	1.1453	220	3.2%
9	N	1.1400	1.1997	60	5.2%
9	O	1.1800	1.2573	51	6.5%
9	P	1.1900	1.2977		9.0%
9	Q	1.2100	1.3569		12.1%
9	R	1.5400	1.4120	203	-8.3%
9	S	1.5400	1.4648		-4.9%
9	T1	1.2100	1.3569		12.1%
9	T2	1.1900	1.2977	130	9.0%
9	T3	1.1800	1.2573		6.5%
9	T4	0.7600	0.8883	319	16.9%
9	U1	1.2100	1.3569		12.1%
9	U2	1.1900	1.2977		9.0%
9	U3	1.1800	1.2573		6.5%
9	U4	0.7600	0.8883		16.9%
9	U5	1.5400	1.4120	135	-8.3%
Error	Error			(56)	
Total				356,307	12.4%

Tier Factors - OTC/LL

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
6	Q	1.5300	1.4862	12,747	-2.9%
6	R	1.8200	1.5203	14,541	-16.5%
6	S	1.8200	1.5574	4,952	-14.4%
6	T1	1.5300	1.4862		-2.9%
6	T2	1.4800	1.4523	9,854	-1.9%
6	T3	1.4300	1.4097	956	-1.4%
6	T4	1.0600	1.1435	1,410	7.9%
6	U1	1.5300	1.4862	548	-2.9%
6	U2	1.4800	1.4523	731	-1.9%
6	U3	1.4300	1.4097		-1.4%
6	U4	1.0600	1.1435	71	7.9%
6	U5	1.8200	1.5203	9,749	-16.5%
8	A	0.6900	0.7969	2,466	15.5%
8	B	0.7400	0.8323	3,504	12.5%
8	C	0.7500	0.8585	1,787	14.5%
8	D	0.7900	0.9009	1,498	14.0%
8	E	0.8300	0.9249	3,562	11.4%
8	F	0.8700	0.9581	1,180	10.1%
8	G	0.9100	0.9913	2,258	8.9%
8	H	0.9500	1.0159	928	6.9%
8	I	1.0300	1.0575	2,024	2.7%
8	J	1.0500	1.0866	1,228	3.5%
8	K	1.1300	1.1200	660	-0.9%
8	L	1.2100	1.1609	329	-4.1%
8	M	1.2400	1.1923	1,079	-3.8%
8	N	1.2700	1.2235	118	-3.7%
8	O	1.2900	1.2604	181	-2.3%
8	P	1.3200	1.2838	300	-2.7%
8	Q	1.3700	1.3190	422	-3.7%
8	R	1.6400	1.3579	(82)	-17.2%
8	S	1.6400	1.3910		-15.2%
8	T1	1.3700	1.3190		-3.7%
8	T2	1.3200	1.2838	223	-2.7%
8	T3	1.2900	1.2604		-2.3%
8	T4	0.9500	1.0159	90	6.9%
8	U1	1.3700	1.3190		-3.7%
8	U2	1.3200	1.2838		-2.7%
8	U3	1.2900	1.2604		-2.3%
8	U4	0.9500	1.0159		6.9%
8	U5	1.6400	1.3579	221	-17.2%
9	A	0.6000	0.7910	1,698	31.8%
9	B	0.6400	0.8216	2,379	28.4%
9	C	0.6500	0.8494	1,536	30.7%
9	D	0.6900	0.8982	1,606	30.2%
9	E	0.7300	0.9285	1,514	27.2%
9	F	0.7600	0.9554	828	25.7%
9	G	0.8000	0.9948	442	24.3%
9	H	0.8400	1.0252	576	22.0%
9	I	0.9000	1.0547	741	17.2%
9	J	0.9200	1.0867	664	18.1%
9	K	0.9900	1.1200	382	13.1%
9	L	1.0600	1.1608	150	9.5%
9	M	1.0900	1.1963	225	9.7%
9	N	1.1100	1.2205	(15)	10.0%
9	O	1.1300	1.2602	144	11.5%
9	P	1.1600	1.2877		11.0%
9	Q	1.2000	1.3187		9.9%
9	R	1.4300	1.3514	125	-5.5%
9	S	1.4300	1.3844		-3.2%
9	T1	1.2000	1.3187		9.9%
9	T2	1.1600	1.2877	61	11.0%
9	T3	1.1300	1.2602		11.5%
9	T4	0.8400	1.0252	155	22.0%
9	U1	1.2000	1.3187		9.9%
9	U2	1.1600	1.2877		11.0%
9	U3	1.1300	1.2602		11.5%
9	U4	0.8400	1.0252		22.0%
9	U5	1.4300	1.3514	76	-5.5%
Error	Error			(228)	
Total				929,810	4.1%

Tier Factors - COLL/UMPD

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
1	A	1.0146	1.3455	19,044	32.6%
1	B	1.0830	1.3675	23,057	26.3%
1	C	1.1400	1.3894	45,370	21.9%
1	D	1.2084	1.4114	61,809	16.8%
1	E	1.2768	1.4333	82,610	12.3%
1	F	1.3452	1.4554	81,037	8.2%
1	G	1.3700	1.4772	103,237	7.8%
1	H	1.4478	1.4993	100,620	3.6%
1	I	1.5048	1.5212	68,093	1.1%
1	J	1.5390	1.5433	89,463	0.3%
1	K	1.5618	1.5652	85,617	0.2%
1	L	1.6530	1.5871	90,318	-4.0%
1	M	1.7100	1.6091	80,679	-5.9%
1	N	1.7442	1.6310	72,748	-6.5%
1	O	1.7670	1.6532	53,396	-6.4%
1	P	1.7898	1.6751	47,351	-6.4%
1	Q	1.8582	1.6972	59,407	-8.7%
1	R	2.0520	1.7190	45,436	-16.2%
1	S	2.0520	1.7411	16,891	-15.2%
1	T1	1.8582	1.6972	2,038	-8.7%
1	T2	1.7898	1.6751	39,218	-6.4%
1	T3	1.7670	1.6532	2,337	-6.4%
1	T4	1.4478	1.4993	1,593	3.6%
1	U1	1.8582	1.6972	552	-8.7%
1	U2	1.7898	1.6751	1,144	-6.4%
1	U3	1.7670	1.6532	10	-6.4%
1	U4	1.4478	1.4993	235	3.6%
1	U5	2.0520	1.7190	30,273	-16.2%
2	A	0.7800	1.0322	2,585	32.3%
2	B	0.8300	1.0457	9,779	26.0%
2	C	0.8700	1.0580	12,534	21.6%
2	D	0.9300	1.0839	13,949	16.5%
2	E	0.9800	1.0977	19,394	12.0%
2	F	1.0300	1.1119	17,619	8.0%
2	G	1.0400	1.1190	19,684	7.6%
2	H	1.1100	1.1470	16,137	3.3%
2	I	1.1600	1.1701	14,503	0.9%
2	J	1.1800	1.1807	15,006	0.1%
2	K	1.2000	1.2000	14,955	0.0%
2	L	1.2600	1.2071	12,269	-4.2%
2	M	1.3000	1.2207	8,493	-6.1%
2	N	1.3300	1.2410	9,872	-6.7%
2	O	1.3500	1.2603	7,933	-6.6%
2	P	1.3700	1.2794	9,122	-6.6%
2	Q	1.4300	1.3032	9,279	-8.9%
2	R	1.5700	1.3124	8,784	-16.4%
2	S	1.5700	1.3292	2,006	-15.3%
2	T1	1.4300	1.3032		-8.9%
2	T2	1.3700	1.2794	6,071	-6.6%
2	T3	1.3500	1.2603	573	-6.6%
2	T4	1.1100	1.1470	26	3.3%
2	U1	1.4300	1.3032	787	-8.9%
2	U2	1.3700	1.2794		-6.6%
2	U3	1.3500	1.2603		-6.6%
2	U4	1.1100	1.1470		3.3%
2	U5	1.5700	1.3124	9,805	-16.4%
4	A	0.7200	1.0121	255	40.6%
4	B	0.7600	1.0171	1,333	33.8%
4	C	0.8100	1.0463	578	29.2%
4	D	0.8600	1.0646	1,138	23.8%
4	E	0.9000	1.0709	1,168	19.0%
4	F	0.9500	1.0894	543	14.7%
4	G	0.9700	1.1086	1,818	14.3%
4	H	1.0200	1.1196	105	9.8%

Tier Factors - RNT

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
1	A	1.4250	1.4250	596	0.0%
1	B	1.4250	1.4250	777	0.0%
1	C	1.4250	1.4250	1,379	0.0%
1	D	1.4250	1.4250	1,419	0.0%
1	E	1.4250	1.4250	2,188	0.0%
1	F	1.4250	1.4250	1,561	0.0%
1	G	1.4250	1.4250	2,426	0.0%
1	H	1.4250	1.4250	2,414	0.0%
1	I	1.4250	1.4250	1,253	0.0%
1	J	1.4250	1.4250	1,678	0.0%
1	K	1.4250	1.4250	1,352	0.0%
1	L	1.4250	1.4250	2,029	0.0%
1	M	1.4250	1.4250	1,607	0.0%
1	N	1.4250	1.4250	1,180	0.0%
1	O	1.4250	1.4250	819	0.0%
1	P	1.4250	1.4250	978	0.0%
1	Q	1.4250	1.4250	957	0.0%
1	R	1.4250	1.4250	495	0.0%
1	S	1.4250	1.4250	179	0.0%
1	T1	1.4250	1.4250		0.0%
1	T2	1.4250	1.4250	590	0.0%
1	T3	1.4250	1.4250	68	0.0%
1	T4	1.4250	1.4250	53	0.0%
1	U1	1.4250	1.4250	10	0.0%
1	U2	1.4250	1.4250	-	0.0%
1	U3	1.4250	1.4250		0.0%
1	U4	1.4250	1.4250		0.0%
1	U5	1.4250	1.4250	248	0.0%
2	A	1.1000	1.1000	59	0.0%
2	B	1.1000	1.1000	321	0.0%
2	C	1.1000	1.1000	580	0.0%
2	D	1.1000	1.1000	333	0.0%
2	E	1.1000	1.1000	540	0.0%
2	F	1.1000	1.1000	411	0.0%
2	G	1.1000	1.1000	426	0.0%
2	H	1.1000	1.1000	434	0.0%
2	I	1.1000	1.1000	272	0.0%
2	J	1.1000	1.1000	320	0.0%
2	K	1.1000	1.1000	385	0.0%
2	L	1.1000	1.1000	271	0.0%
2	M	1.1000	1.1000	262	0.0%
2	N	1.1000	1.1000	162	0.0%
2	O	1.1000	1.1000	87	0.0%
2	P	1.1000	1.1000	92	0.0%
2	Q	1.1000	1.1000	249	0.0%
2	R	1.1000	1.1000	92	0.0%
2	S	1.1000	1.1000	54	0.0%
2	T1	1.1000	1.1000		0.0%
2	T2	1.1000	1.1000	54	0.0%
2	T3	1.1000	1.1000		0.0%
2	T4	1.1000	1.1000		0.0%
2	U1	1.1000	1.1000		0.0%
2	U2	1.1000	1.1000		0.0%
2	U3	1.1000	1.1000		0.0%
2	U4	1.1000	1.1000		0.0%
2	U5	1.1000	1.1000	207	0.0%
4	A	1.0600	1.0600		0.0%
4	B	1.0600	1.0600	12	0.0%
4	C	1.0600	1.0600	41	0.0%
4	D	1.0600	1.0600	63	0.0%
4	E	1.0600	1.0600	92	0.0%
4	F	1.0600	1.0600		0.0%
4	G	1.0600	1.0600	79	0.0%
4	H	1.0600	1.0600	21	0.0%

Tier Factors - COLL/UMPD

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
4	I	1.0700	1.1466	1,081	7.2%
4	J	1.0900	1.1586	930	6.3%
4	K	1.1100	1.1791	377	6.2%
4	L	1.1700	1.1907	174	1.8%
4	M	1.2100	1.2070	515	-0.2%
4	N	1.2300	1.2192	153	-0.9%
4	O	1.2500	1.2396		-0.8%
4	P	1.2700	1.2598		-0.8%
4	Q	1.3200	1.2778	154	-3.2%
4	R	1.4530	1.2902		-11.2%
4	S	1.4100	1.2681		-10.1%
4	T1	1.3200	1.2778		-3.2%
4	T2	1.2700	1.2598		-0.8%
4	T3	1.2500	1.2396		-0.8%
4	T4	1.0200	1.1196		9.8%
4	U1	1.3200	1.2778		-3.2%
4	U2	1.2700	1.2598		-0.8%
4	U3	1.2500	1.2396		-0.8%
4	U4	1.0200	1.1196		9.8%
4	U5	1.4500	1.2876	40	-11.2%
5	A	0.6600	0.9561	5	44.9%
5	B	0.7000	0.9654	581	37.9%
5	C	0.7400	0.9851	498	33.1%
5	D	0.7900	1.0079	338	27.6%
5	E	0.8300	1.0177	294	22.6%
5	F	0.8700	1.0281		18.2%
5	G	0.8900	1.0482	12	17.8%
5	H	0.9400	1.0632	1,012	13.1%
5	I	0.9800	1.0821		10.4%
5	J	1.0000	1.0953	155	9.5%
5	K	1.0200	1.1165	285	9.5%
5	L	1.0800	1.1326		4.9%
5	M	1.1100	1.1409		2.8%
5	N	1.1400	1.1644	616	2.1%
5	O	1.1500	1.1752		2.2%
5	P	1.1700	1.1960		2.2%
5	Q	1.2100	1.2070		-0.2%
5	R	1.3400	1.2261		-8.5%
5	S	1.3400	1.2419		-7.3%
5	T1	1.2100	1.2070		-0.2%
5	T2	1.1700	1.1960		2.2%
5	T3	1.1500	1.1752		2.2%
5	T4	0.9400	1.0632		13.1%
5	U1	1.2100	1.2070		-0.2%
5	U2	1.1700	1.1960		2.2%
5	U3	1.1500	1.1752		2.2%
5	U4	0.9400	1.0632		13.1%
5	U5	1.3400	1.2261		-8.5%
6	A	0.7800	1.0322	42,262	32.3%
6	B	0.8300	1.0457	74,718	26.0%
6	C	0.8700	1.0580	105,437	21.6%
6	D	0.9300	1.0839	107,309	16.5%
6	E	0.9800	1.0977	139,577	12.0%
6	F	1.0300	1.1119	103,118	8.0%
6	G	1.0400	1.1190	160,057	7.6%
6	H	1.1100	1.1470	142,027	3.3%
6	I	1.1600	1.1701	93,957	0.9%
6	J	1.1800	1.1807	113,771	0.1%
6	K	1.2000	1.2000	95,038	0.0%
6	L	1.2600	1.2071	89,429	-4.2%
6	M	1.3000	1.2207	64,867	-6.1%
6	N	1.3300	1.2410	64,564	-6.7%
6	O	1.3500	1.2603	50,525	-6.6%
6	P	1.3700	1.2794	51,417	-6.6%

Tier Factors - RNT

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
4	I	1.0600	1.0600	33	0.0%
4	J	1.0600	1.0600	36	0.0%
4	K	1.0600	1.0600	51	0.0%
4	L	1.0600	1.0600	29	0.0%
4	M	1.0600	1.0600	57	0.0%
4	N	1.0600	1.0600	10	0.0%
4	O	1.0600	1.0600		0.0%
4	P	1.0600	1.0600		0.0%
4	Q	1.0600	1.0600	7	0.0%
4	R	1.0600	1.0600		0.0%
4	S	1.0600	1.0600		0.0%
4	T1	1.0600	1.0600		0.0%
4	T2	1.0600	1.0600		0.0%
4	T3	1.0600	1.0600		0.0%
4	T4	1.0600	1.0600		0.0%
4	U1	1.0600	1.0600		0.0%
4	U2	1.0600	1.0600		0.0%
4	U3	1.0600	1.0600		0.0%
4	U4	1.0600	1.0600		0.0%
4	U5	1.0600	1.0600		0.0%
5	A	0.8800	0.8800		0.0%
5	B	0.8800	0.8800	72	0.0%
5	C	0.8800	0.8800	7	0.0%
5	D	0.8800	0.8800	24	0.0%
5	E	0.8800	0.8800	34	0.0%
5	F	0.8800	0.8800		0.0%
5	G	0.8800	0.8800		0.0%
5	H	0.8800	0.8800	34	0.0%
5	I	0.8800	0.8800		0.0%
5	J	0.8800	0.8800		0.0%
5	K	0.8800	0.8800	27	0.0%
5	L	0.8800	0.8800		0.0%
5	M	0.8800	0.8800		0.0%
5	N	0.8800	0.8800		0.0%
5	O	0.8800	0.8800		0.0%
5	P	0.8800	0.8800		0.0%
5	Q	0.8800	0.8800		0.0%
5	R	0.8800	0.8800		0.0%
5	S	0.8800	0.8800		0.0%
5	T1	0.8800	0.8800		0.0%
5	T2	0.8800	0.8800		0.0%
5	T3	0.8800	0.8800		0.0%
5	T4	0.8800	0.8800		0.0%
5	U1	0.8800	0.8800		0.0%
5	U2	0.8800	0.8800		0.0%
5	U3	0.8800	0.8800		0.0%
5	U4	0.8800	0.8800		0.0%
5	U5	0.8800	0.8800		0.0%
6	A	1.1000	1.1000	1,502	0.0%
6	B	1.1000	1.1000	2,344	0.0%
6	C	1.1000	1.1000	3,516	0.0%
6	D	1.1000	1.1000	3,170	0.0%
6	E	1.1000	1.1000	3,976	0.0%
6	F	1.1000	1.1000	2,572	0.0%
6	G	1.1000	1.1000	4,083	0.0%
6	H	1.1000	1.1000	2,830	0.0%
6	I	1.1000	1.1000	1,421	0.0%
6	J	1.1000	1.1000	2,148	0.0%
6	K	1.1000	1.1000	1,795	0.0%
6	L	1.1000	1.1000	1,777	0.0%
6	M	1.1000	1.1000	1,304	0.0%
6	N	1.1000	1.1000	1,738	0.0%
6	O	1.1000	1.1000	910	0.0%
6	P	1.1000	1.1000	874	0.0%

Tier Factors - COLL/UMPD

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
6	Q	1.4300	1.3032	45,640	-8.9%
6	R	1.5700	1.3124	51,553	-16.4%
6	S	1.5700	1.3292	16,650	-15.3%
6	T1	1.4300	1.3032	120	-8.9%
6	T2	1.3700	1.2794	36,859	-6.6%
6	T3	1.3500	1.2603	3,997	-6.6%
6	T4	1.1100	1.1470	6,415	3.3%
6	U1	1.4300	1.3032	1,528	-8.9%
6	U2	1.3700	1.2794	2,415	-6.6%
6	U3	1.3500	1.2603	1	-6.6%
6	U4	1.1100	1.1470	346	3.3%
6	U5	1.5700	1.3124	31,001	-16.4%
8	A	0.6600	0.8487	10,338	28.6%
8	B	0.7000	0.8571	13,862	22.4%
8	C	0.7400	0.8746	7,883	18.2%
8	D	0.7900	0.8948	5,043	13.3%
8	E	0.8300	0.9035	12,275	8.9%
8	F	0.8700	0.9127	4,387	4.9%
8	G	0.8900	0.9307	10,859	4.6%
8	H	0.9400	0.9440	3,790	0.4%
8	I	0.9800	0.9607	6,868	-2.0%
8	J	1.0000	0.9725	4,876	-2.8%
8	K	1.0200	0.9913	2,470	-2.8%
8	L	1.0800	1.0056	1,207	-6.9%
8	M	1.1100	1.0130	4,263	-8.7%
8	N	1.1400	1.0338	645	-9.3%
8	O	1.1500	1.0434	895	-9.3%
8	P	1.1700	1.0619	1,139	-9.2%
8	Q	1.2100	1.0717	1,473	-11.4%
8	R	1.3400	1.0886	(259)	-18.8%
8	S	1.3400	1.1026		-17.7%
8	T1	1.2100	1.0717		-11.4%
8	T2	1.1700	1.0619	749	-9.2%
8	T3	1.1500	1.0434		-9.3%
8	T4	0.9400	0.9440	349	0.4%
8	U1	1.2100	1.0717		-11.4%
8	U2	1.1700	1.0619		-9.2%
8	U3	1.1500	1.0434		-9.3%
8	U4	0.9400	0.9440		0.4%
8	U5	1.3400	1.0886	704	-18.8%
9	A	0.6100	0.8512	8,877	39.5%
9	B	0.6400	0.8502	11,557	32.9%
9	C	0.6800	0.8721	6,496	28.2%
9	D	0.7200	0.8850	11,152	22.9%
9	E	0.7600	0.8977	7,515	18.1%
9	F	0.8000	0.9108	3,975	13.8%
9	G	0.8200	0.9304	1,871	13.5%
9	H	0.8600	0.9371	2,470	9.0%
9	I	0.9000	0.9573	3,080	6.4%
9	J	0.9200	0.9709	2,780	5.5%
9	K	0.9400	0.9913	1,696	5.5%
9	L	0.9900	1.0002	458	1.0%
9	M	1.0200	1.0101	1,070	-1.0%
9	N	1.0400	1.0234	(5)	-1.6%
9	O	1.0600	1.0436	429	-1.6%
9	P	1.0700	1.0537		-1.5%
9	Q	1.1100	1.0668		-3.9%
9	R	1.2300	1.0843	576	-11.8%
9	S	1.2300	1.0983		-10.7%
9	T1	1.1100	1.0668		-3.9%
9	T2	1.0700	1.0537	321	-1.5%
9	T3	1.0600	1.0436		-1.6%
9	T4	0.8600	0.9371	788	9.0%
9	U1	1.1100	1.0668		-3.9%
9	U2	1.0700	1.0537		-1.5%
9	U3	1.0600	1.0436		-1.6%
9	U4	0.8600	0.9371		9.0%
9	U5	1.2300	1.0843	553	-11.8%
Error	Error			(981)	
Total				3,412,002	3.7%

Tier Factors - RNT

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
6	Q	1.1000	1.1000	1,197	0.0%
6	R	1.1000	1.1000	972	0.0%
6	S	1.1000	1.1000	264	0.0%
6	T1	1.1000	1.1000		0.0%
6	T2	1.1000	1.1000	403	0.0%
6	T3	1.1000	1.1000	64	0.0%
6	T4	1.1000	1.1000	229	0.0%
6	U1	1.1000	1.1000		0.0%
6	U2	1.1000	1.1000		0.0%
6	U3	1.1000	1.1000		0.0%
6	U4	1.1000	1.1000		0.0%
6	U5	1.1000	1.1000	449	0.0%
8	A	0.8800	0.8800	571	0.0%
8	B	0.8800	0.8800	613	0.0%
8	C	0.8800	0.8800	367	0.0%
8	D	0.8800	0.8800	207	0.0%
8	E	0.8800	0.8800	1,015	0.0%
8	F	0.8800	0.8800	362	0.0%
8	G	0.8800	0.8800	470	0.0%
8	H	0.8800	0.8800	103	0.0%
8	I	0.8800	0.8800	343	0.0%
8	J	0.8800	0.8800	117	0.0%
8	K	0.8800	0.8800	128	0.0%
8	L	0.8800	0.8800	24	0.0%
8	M	0.8800	0.8800	203	0.0%
8	N	0.8800	0.8800	17	0.0%
8	O	0.8800	0.8800	34	0.0%
8	P	0.8800	0.8800	58	0.0%
8	Q	0.8800	0.8800		0.0%
8	R	0.8800	0.8800		0.0%
8	S	0.8800	0.8800		0.0%
8	T1	0.8800	0.8800		0.0%
8	T2	0.8800	0.8800		0.0%
8	T3	0.8800	0.8800		0.0%
8	T4	0.8800	0.8800		0.0%
8	U1	0.8800	0.8800		0.0%
8	U2	0.8800	0.8800		0.0%
8	U3	0.8800	0.8800		0.0%
8	U4	0.8800	0.8800		0.0%
8	U5	0.8800	0.8800		0.0%
9	A	0.7000	0.7000	489	0.0%
9	B	0.7000	0.7000	424	0.0%
9	C	0.7000	0.7000	429	0.0%
9	D	0.7000	0.7000	396	0.0%
9	E	0.7000	0.7000	196	0.0%
9	F	0.7000	0.7000	325	0.0%
9	G	0.7000	0.7000	121	0.0%
9	H	0.7000	0.7000	127	0.0%
9	I	0.7000	0.7000	153	0.0%
9	J	0.7000	0.7000	48	0.0%
9	K	0.7000	0.7000	(16)	0.0%
9	L	0.7000	0.7000		0.0%
9	M	0.7000	0.7000	14	0.0%
9	N	0.7000	0.7000		0.0%
9	O	0.7000	0.7000		0.0%
9	P	0.7000	0.7000		0.0%
9	Q	0.7000	0.7000		0.0%
9	R	0.7000	0.7000	14	0.0%
9	S	0.7000	0.7000		0.0%
9	T1	0.7000	0.7000		0.0%
9	T2	0.7000	0.7000	17	0.0%
9	T3	0.7000	0.7000		0.0%
9	T4	0.7000	0.7000		0.0%
9	U1	0.7000	0.7000		0.0%
9	U2	0.7000	0.7000		0.0%
9	U3	0.7000	0.7000		0.0%
9	U4	0.7000	0.7000		0.0%
9	U5	0.7000	0.7000		0.0%
Error	Error			(7)	
Total				79,503	0.0%

Tier Factors - TOW/AEQ

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
1	A	1.0000	1.0000	130	0.0%
1	B	1.0000	1.0000	142	0.0%
1	C	1.0000	1.0000	272	0.0%
1	D	1.0000	1.0000	287	0.0%
1	E	1.0000	1.0000	398	0.0%
1	F	1.0000	1.0000	491	0.0%
1	G	1.0000	1.0000	577	0.0%
1	H	1.0000	1.0000	547	0.0%
1	I	1.0000	1.0000	198	0.0%
1	J	1.0000	1.0000	517	0.0%
1	K	1.0000	1.0000	267	0.0%
1	L	1.0000	1.0000	449	0.0%
1	M	1.0000	1.0000	424	0.0%
1	N	1.0000	1.0000	371	0.0%
1	O	1.0000	1.0000	139	0.0%
1	P	1.0000	1.0000	215	0.0%
1	Q	1.0000	1.0000	318	0.0%
1	R	1.0000	1.0000	89	0.0%
1	S	1.0000	1.0000	39	0.0%
1	T1	1.0000	1.0000		0.0%
1	T2	1.0000	1.0000	112	0.0%
1	T3	1.0000	1.0000	16	0.0%
1	T4	1.0000	1.0000	14	0.0%
1	U1	1.0000	1.0000	3	0.0%
1	U2	1.0000	1.0000		0.0%
1	U3	1.0000	1.0000		0.0%
1	U4	1.0000	1.0000		0.0%
1	U5	1.0000	1.0000	190	0.0%
2	A	1.0000	1.0000	15	0.0%
2	B	1.0000	1.0000	88	0.0%
2	C	1.0000	1.0000	134	0.0%
2	D	1.0000	1.0000	85	0.0%
2	E	1.0000	1.0000	159	0.0%
2	F	1.0000	1.0000	104	0.0%
2	G	1.0000	1.0000	101	0.0%
2	H	1.0000	1.0000	128	0.0%
2	I	1.0000	1.0000	71	0.0%
2	J	1.0000	1.0000	83	0.0%
2	K	1.0000	1.0000	86	0.0%
2	L	1.0000	1.0000	84	0.0%
2	M	1.0000	1.0000	149	0.0%
2	N	1.0000	1.0000	71	0.0%
2	O	1.0000	1.0000	24	0.0%
2	P	1.0000	1.0000	26	0.0%
2	Q	1.0000	1.0000	61	0.0%
2	R	1.0000	1.0000	18	0.0%
2	S	1.0000	1.0000	15	0.0%
2	T1	1.0000	1.0000		0.0%
2	T2	1.0000	1.0000	8	0.0%
2	T3	1.0000	1.0000		0.0%
2	T4	1.0000	1.0000		0.0%
2	U1	1.0000	1.0000		0.0%
2	U2	1.0000	1.0000		0.0%
2	U3	1.0000	1.0000		0.0%
2	U4	1.0000	1.0000		0.0%
2	U5	1.0000	1.0000	44	0.0%
4	A	1.0000	1.0000	5	0.0%
4	B	1.0000	1.0000	4	0.0%
4	C	1.0000	1.0000	8	0.0%
4	D	1.0000	1.0000	81	0.0%
4	E	1.0000	1.0000	21	0.0%
4	F	1.0000	1.0000		0.0%
4	G	1.0000	1.0000	30	0.0%
4	H	1.0000	1.0000	5	0.0%

Tier Factors - TOW/AEQ

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
4	I	1.0000	1.0000	7	0.0%
4	J	1.0000	1.0000	6	0.0%
4	K	1.0000	1.0000	12	0.0%
4	L	1.0000	1.0000	6	0.0%
4	M	1.0000	1.0000	10	0.0%
4	N	1.0000	1.0000	2	0.0%
4	O	1.0000	1.0000		0.0%
4	P	1.0000	1.0000		0.0%
4	Q	1.0000	1.0000	2	0.0%
4	R	1.0000	1.0000		0.0%
4	S	1.0000	1.0000		0.0%
4	T1	1.0000	1.0000		0.0%
4	T2	1.0000	1.0000		0.0%
4	T3	1.0000	1.0000		0.0%
4	T4	1.0000	1.0000		0.0%
4	U1	1.0000	1.0000		0.0%
4	U2	1.0000	1.0000		0.0%
4	U3	1.0000	1.0000		0.0%
4	U4	1.0000	1.0000		0.0%
4	U5	1.0000	1.0000		0.0%
5	A	1.0000	1.0000		0.0%
5	B	1.0000	1.0000	26	0.0%
5	C	1.0000	1.0000	2	0.0%
5	D	1.0000	1.0000	6	0.0%
5	E	1.0000	1.0000	12	0.0%
5	F	1.0000	1.0000		0.0%
5	G	1.0000	1.0000		0.0%
5	H	1.0000	1.0000	12	0.0%
5	I	1.0000	1.0000		0.0%
5	J	1.0000	1.0000		0.0%
5	K	1.0000	1.0000	7	0.0%
5	L	1.0000	1.0000		0.0%
5	M	1.0000	1.0000		0.0%
5	N	1.0000	1.0000		0.0%
5	O	1.0000	1.0000		0.0%
5	P	1.0000	1.0000		0.0%
5	Q	1.0000	1.0000		0.0%
5	R	1.0000	1.0000		0.0%
5	S	1.0000	1.0000		0.0%
5	T1	1.0000	1.0000		0.0%
5	T2	1.0000	1.0000		0.0%
5	T3	1.0000	1.0000		0.0%
5	T4	1.0000	1.0000		0.0%
5	U1	1.0000	1.0000		0.0%
5	U2	1.0000	1.0000		0.0%
5	U3	1.0000	1.0000		0.0%
5	U4	1.0000	1.0000		0.0%
5	U5	1.0000	1.0000		0.0%
6	A	1.0000	1.0000	387	0.0%
6	B	1.0000	1.0000	563	0.0%
6	C	1.0000	1.0000	854	0.0%
6	D	1.0000	1.0000	806	0.0%
6	E	1.0000	1.0000	962	0.0%
6	F	1.0000	1.0000	766	0.0%
6	G	1.0000	1.0000	1,349	0.0%
6	H	1.0000	1.0000	787	0.0%
6	I	1.0000	1.0000	622	0.0%
6	J	1.0000	1.0000	822	0.0%
6	K	1.0000	1.0000	512	0.0%
6	L	1.0000	1.0000	483	0.0%
6	M	1.0000	1.0000	473	0.0%
6	N	1.0000	1.0000	368	0.0%
6	O	1.0000	1.0000	200	0.0%
6	P	1.0000	1.0000	651	0.0%

Tier Factors - TOW/AEQ

UW Tier	Credit Tier	Current Factor	Proposed Factor	ITD NWP	Percent Change
6	Q	1.0000	1.0000	454	0.0%
6	R	1.0000	1.0000	192	0.0%
6	S	1.0000	1.0000	55	0.0%
6	T1	1.0000	1.0000		0.0%
6	T2	1.0000	1.0000	88	0.0%
6	T3	1.0000	1.0000		0.0%
6	T4	1.0000	1.0000	66	0.0%
6	U1	1.0000	1.0000		0.0%
6	U2	1.0000	1.0000		0.0%
6	U3	1.0000	1.0000		0.0%
6	U4	1.0000	1.0000		0.0%
6	U5	1.0000	1.0000	120	0.0%
8	A	1.0000	1.0000	185	0.0%
8	B	1.0000	1.0000	303	0.0%
8	C	1.0000	1.0000	148	0.0%
8	D	1.0000	1.0000	87	0.0%
8	E	1.0000	1.0000	322	0.0%
8	F	1.0000	1.0000	113	0.0%
8	G	1.0000	1.0000	169	0.0%
8	H	1.0000	1.0000	49	0.0%
8	I	1.0000	1.0000	98	0.0%
8	J	1.0000	1.0000	44	0.0%
8	K	1.0000	1.0000	54	0.0%
8	L	1.0000	1.0000	24	0.0%
8	M	1.0000	1.0000	75	0.0%
8	N	1.0000	1.0000	6	0.0%
8	O	1.0000	1.0000	10	0.0%
8	P	1.0000	1.0000		0.0%
8	Q	1.0000	1.0000	15	0.0%
8	R	1.0000	1.0000		0.0%
8	S	1.0000	1.0000		0.0%
8	T1	1.0000	1.0000		0.0%
8	T2	1.0000	1.0000		0.0%
8	T3	1.0000	1.0000		0.0%
8	T4	1.0000	1.0000	10	0.0%
8	U1	1.0000	1.0000		0.0%
8	U2	1.0000	1.0000		0.0%
8	U3	1.0000	1.0000		0.0%
8	U4	1.0000	1.0000		0.0%
8	U5	1.0000	1.0000		0.0%
9	A	1.0000	1.0000	324	0.0%
9	B	1.0000	1.0000	206	0.0%
9	C	1.0000	1.0000	189	0.0%
9	D	1.0000	1.0000	191	0.0%
9	E	1.0000	1.0000	113	0.0%
9	F	1.0000	1.0000	112	0.0%
9	G	1.0000	1.0000	39	0.0%
9	H	1.0000	1.0000	65	0.0%
9	I	1.0000	1.0000	78	0.0%
9	J	1.0000	1.0000	15	0.0%
9	K	1.0000	1.0000	15	0.0%
9	L	1.0000	1.0000	16	0.0%
9	M	1.0000	1.0000	6	0.0%
9	N	1.0000	1.0000		0.0%
9	O	1.0000	1.0000	15	0.0%
9	P	1.0000	1.0000		0.0%
9	Q	1.0000	1.0000		0.0%
9	R	1.0000	1.0000	6	0.0%
9	S	1.0000	1.0000		0.0%
9	T1	1.0000	1.0000		0.0%
9	T2	1.0000	1.0000	1	0.0%
9	T3	1.0000	1.0000		0.0%
9	T4	1.0000	1.0000	30	0.0%
9	U1	1.0000	1.0000		0.0%
9	U2	1.0000	1.0000		0.0%
9	U3	1.0000	1.0000		0.0%
9	U4	1.0000	1.0000		0.0%
9	U5	1.0000	1.0000		0.0%
Error	Error			(3)	
Total				22,737	0.0%

SYMBOL FACTORS

ISO PHYS DAM SYMBOL	OTC/LOAN/LEASE FACTOR	COLL/UMPD FACTOR	
1	0.502	0.695	
2	0.537	0.721	
3	0.576	0.748	
4	0.617	0.775	
5	0.692	0.804	
6	0.740	0.834	
7	0.770	0.865	
8	0.813	0.897	
10	0.871	0.930	
11	0.933	0.964	
12	1.000	1.000	
13	1.071	1.037	
14	1.148	1.075	
15	1.230	1.115	
16	1.318	1.156	
17	1.359	1.199	
18	1.440	1.244	
19	1.570	1.290	
20	1.737	1.337	
21	1.861	1.387	
22	1.994	1.438	
23	2.136	1.491	
24	2.289	1.547	
25	2.453	1.604	
26	2.628	1.663	
27	2.816	1.725	
66	1.000	1.000	Stated Amount Vehicles
67	1.000	1.000	Conversion Vans
68a	1.000	1.000	Horse Trailer
68b	1.000	1.000	Utility Trailer
68c	2.000	2.000	Homemade Trailer
68d	1.000	1.000	Conventional Travel Trailer
68e	1.000	1.000	5th Wheel Travel Trailer
68f	1.000	1.000	Popup Travel Trailer
68g	1.000	1.000	Mounted Camper

BI/PD SYMBOLS	RATING FACTOR	PIP/UMBI/UIMBI SYMBOLS	
	0.800	450	
255	0.800	455	
260	0.800	460	
265	0.800	465	
270	0.800	470	
275	0.800	475	
280	0.800	480	
285	0.850	485	
290	0.900	490	
295	0.950	495	
300	1.000	500	
305	1.050	505	
310	1.100	510	
315	1.150	515	
320	1.200	520	
325	1.250	525	
330	1.250	530	
335	1.250	535	
340	1.250	540	
345	1.250	545	
350	1.250	550	
355	1.250	555	
360	1.250	560	
365	1.250	565	
370	1.250	570	
375	1.250	575	
380	1.250	580	
385	1.250	585	
390	1.250	590	
999	1.000	999	Vehicles with no ISO Liability Symbol
65	1.000	1.000	Vehicles not requiring physical damage coverage and that do not appear on the symbol list.
66	1.000	1.000	Stated Amount Vehicles
67	1.000	1.000	Conversion Van
69	1.000	1.000	Named Non-Owner

Stated Amount Vehicles (Symbol 66)

Value Factor	OTC	Col	UMPD	Values	
				0	2500
0 to 2500	1.280	1.100	1.100	2501	5000
2501 to 5000	2.000	1.300	1.300	5001	7500
5001 to 7500	2.720	1.500	1.500	7501	10000
7501 to 10000	3.430	1.690	1.690	10001	15000
10001 to 15000	4.150	1.890	1.890	15001	20000
15001 to 20000	4.400	1.950	1.950	20001	25000
20001 to 25000	4.870	2.080	2.080	25001	30000
25001 to 30000	5.100	2.180	2.180	30001	35000
30001 to 35000	5.590	2.280	2.280	35001	40000
35001 to 40000	5.900	2.380	2.380	40001	45000
40001 to 45000	6.300	2.470	2.470	45001	50000
45001 to 50000	6.800	2.570	2.570	50001	55000
50001 to 55000	7.020	2.670	2.670	55001	60000
55001 to 60000	7.300	2.770	2.770	60001	65000
60001 to 65000	7.740	2.870	2.870	65001	70000
65001 to 70000	8.100	2.970	2.970	70001	75000
70001 to 75000	8.450	3.060	3.060	75001	80000
75001 to 80000	8.800	3.160	3.160	80001	85000
80001 to 85000	9.170	3.260	3.260	85001	90000
85001 to 90000	9.500	3.360	3.360	90001	95000
90001 to 95000	9.890	3.450	3.450	95001	100000
95001 to 100000	10.200	3.550	3.550		

Conversion Vans (Symbol 67)

Value Factor	OTC	Col	UMPD	Values	
				0	2500
0 to 2500	0.740	0.690	0.690	2501	5000
2501 to 5000	0.740	0.690	0.690	5001	7500
5001 to 7500	0.740	0.690	0.690	7501	10000
7501 to 10000	0.740	0.690	0.690	10001	15000
10001 to 15000	1.580	0.990	0.990	15001	20000
15001 to 20000	2.620	1.230	1.230	20001	25000
20001 to 25000	2.700	1.290	1.290	25001	30000
25001 to 30000	3.200	2.440	2.440	30001	35000
30001 to 35000	3.720	1.580	1.580	35001	40000
35001 to 40000	4.150	1.780	1.780	40001	45000
40001 to 45000	4.650	1.980	1.980	45001	50000
45001 to 50000	4.850	2.040	2.040	50001	55000
50001 to 55000	5.020	2.080	2.080	55001	60000
55001 to 60000	5.200	2.130	2.130	60001	65000
60001 to 65000	5.390	2.180	2.180	65001	70000
65001 to 70000	5.520	2.230	2.230	70001	75000
70001 to 75000	5.770	2.280	2.280	75001	80000
75001 to 80000	5.900	2.330	2.330	80001	85000
80001 to 85000	6.140	2.380	2.380	85001	90000
85001 to 90000	6.250	2.430	2.430	90001	95000
90001 to 95000	6.510	2.480	2.480	95001	100000
95001 to 100000	6.700	2.520	2.520		

Trailers (Symbols 68)

Value Factor	OTC	Col
0 to 2500	0.500	0.500
2501 to 5000	0.550	0.550
5001 to 7500	0.600	0.600
7501 to 10000	0.650	0.650
10001 to 12500	0.700	0.700
12501 to 15000	0.750	0.750
15001 to 17500	0.800	0.800
17501 to 20000	0.850	0.850
20001 to 22500	0.900	0.900
22501 to 25000	0.950	0.950
25001 to 27500	1.000	1.000
27501 to 30000	1.050	1.050
30001 to 32500	1.100	1.100
32501 to 35000	1.150	1.150

0	2500
2501	5000
5001	7500
7501	10000
10001	12500
12501	15000
15001	17500
17501	20000
20001	22500
22501	25000
25001	27500
27501	30000
30001	32500
32501	35000

Driver to Vehicle Ratio

Driver/Vehicle Ratio	BI	PD	OTC	COLL	PIP	Loan/ Lease	UM/UIMBI	UMPD	RENTAL
<.50	0.80	0.80	1.00	0.80	0.80	1.00	0.80	0.80	1.00
>=.50 and < 1.0	0.90	0.90	1.00	0.90	0.90	1.00	0.90	0.90	1.00
1	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
>1.0 and <= 2.0	1.20	1.20	1.00	1.20	1.20	1.00	1.20	1.20	1.00
>2.0 and <= 3.0	1.40	1.40	1.00	1.40	1.40	1.00	1.40	1.40	1.00
> 3.0	1.60	1.60	1.00	1.60	1.60	1.00	1.60	1.60	1.00

Rule Number: **44**

Value Class Vehicle Rating

Value Class factors are used to rate stated amount vehicles and conversion vehicles.

A. Stated amount vehicles are vehicles requiring Physical Damage coverage which:
   1. do not appear on the Symbol list;
   2. are limited production, classic, or collectible vehicles; or
   3. are private passenger automobiles having more than $5,000 of custom equipment (i.e., equipment, devices, accessories, enhancements, and changes, other than those which are original manufacturer installed, which are permanently installed or attached and alter the appearance or performance of a vehicle).

      Stated amount vehicles are rated with Symbol 67 for Liability coverages and stated amount value class factors for Other Than Collision and Collision coverages.

      The stated amount value for stated amount vehicles may not exceed $60,000.

B. Conversion vehicles are pick-ups, vans, or utility vehicles requiring Physical Damage coverage that have:
   1. more than $5,000 of custom equipment (i.e., equipment, devices, accessories, enhancements, and changes, other than those which are original manufacturer installed, which are permanently installed or attached and alter the appearance or performance of a vehicle); or
   2. conversion packages.

      Conversion vehicles are rated with Symbol 67 factors for Liability coverages and conversion vehicles value class factors for Other Than Collision and Collision coverages.

Physical Damage coverage on stated amount vehicles and conversion vans provides coverage up to the lowest of the actual cash value, reduced by the deductible and the salvage value if retained by the owner; the amount necessary to replace the property, reduced by the deductible and the salvage value if retained by the owner; the amount necessary to repair the property, reduced by the deductible and the salvage value if retained by the owner; or the stated amount value specified by the insured, reduced by the salvage value if retained y the owner.

Supporting Document Schedules

Satisfied -Name: A-1 Private Passenger Auto Abstract

Review Status: Filed 02/05/2009

Comments:

Attachment:

4 A-1.pdf

Satisfied -Name: APCS-Auto Premium Comparison Survey

Review Status: Filed 02/05/2009

Comments:

Attachment:

5 APCS.xls

Satisfied -Name: NAIC loss cost data entry document

Review Status: Filed 02/05/2009

Comments:

Attachment:

3 FORM RF-1(LC Data Entry Document).pdf

Bypassed -Name: NAIC Loss Cost Filing Document for OTHER than Workers' Comp

Review Status: Filed 02/05/2009

Bypass Reason: This is not a reference filing

Comments:

Satisfied -Name: Uniform Transmittal Document-Property & Casualty

Review Status: Filed 02/05/2009

Comments:

Attachment:

2 FORM UT Property & Casualty Uniform Transmittal Header.pdf

Satisfied -Name: Rate Change Impact

Review Status: Filed 02/05/2009

Comments:

Overall impact remains the same - shifting between base rates and symbols

Attachment:

6 Rate Impact-Overall.pdf

Satisfied -Name: Rate Level Indication

Review Status: Filed 02/05/2009

Comments:

Attachment:

17 Actuarial-Loss Indication.pdf

Satisfied -Name: Max Percent Change

Review Status: Filed 02/05/2009

Comments:

Attachment:

22 DOI Request - Max Policy AR6 00008347.pdf

Satisfied -Name: Tier Loss Experience

Review Status: Filed 02/05/2009

Comments:

Attachment:

23 DOI Request - Tier Experience.pdf

ARKANSAS INSURANCE DEPARTMENT

FORM A-1
Rev. 4/98

PRIVATE PASSENGER AUTOMOBILE ABSTRACT

Instructions: All questions must be answered. If the answer is "none" or "Not applicable", so state. If all questions are not answered, the filing will not be accepted for review by the Department. Use a separate abstract for each company if filing for a group. Subsequent homeowners rate/rule submission that do not alter the information contained herein need not include this form.

Company Name: Imperial Fire and Casualty Insurance Company
NAIC No. 44369 Group No. N/A

1. Are there any areas in the State of Arkansas in which your company will not write automobile insurance? No

2. Do you furnish a market for young drivers? Yes
   Over age 65 drivers? Yes

3. Do you require collateral business to support a youthful driver risk? No

4. Do you insure driver with an international or foreign driver's license? Yes

5. Specify the percentage you allow in credit or discounts for the following:

a.	Driver Over 55	5%
b.	Good Student Discount	5%
c.	Multi-car Discount (varies by coverage)	0%-16%
d.	Accident Free Discount*	4 %
	*Please Specify Qualification for Discount: Three years without violations	
e.	Anti-theft Discount	N/A %
f.	Other (specify)	N/A %
	Prior insurance discount	0%-27%
	Advanced Quote Discount	0%- 4 %
	Homeowner discount (varies by coverage)	0%- 5%
	EFT discount (varies by coverage)	0%- 5%

6. Do you have an installment payment plan for automobile insurance? Yes
   If so, what is the fee for installment payments? $6 ($2 with EFT)

7. Does your company utilize a tiered rating plan? Yes If so, list the programs and percentage difference.
   We utilize credit tiers and underwriting tiers that differ by up to -70%
   State the current volume for each program.
   N/A

THE INFORMATION PROVIDED IS CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Carrie Hewett
Signature
Director of Product Management
Title
(972) 267-8929 x175
Telephone Number

Attachment "5 APCS.xls" is not a PDF document and cannot be reproduced here.

NAIC LOSS COST DATA ENTRY DOCUMENT

1.	This filing transmittal is part of Company Tracking #	**IFACAR20081215R**

2.	If filing is an adoption of an advisory organization loss cost filing, give name of Advisory Organization and Reference/ Item Filing Number	**N/A**

		Company Name		Company NAIC Number
3.	**A.**	**Imperial Fire & Casualty Insurance Company**	**B.**	**44369**

		Product Coding Matrix Line of Business (i.e., Type of Insurance)		Product Coding Matrix Line of Insurance (i.e., Sub-type of Insurance)
4.	**A.**	**Personal Auto**	**B.**	**Private Passenger Auto (PPA)**

5.

(A) COVERAGE (See Instructions)	(B) Indicated % Rate Level Change	(C) Requested % Rate Level Change	FOR LOSS COSTS ONLY (D) Expected Loss Ratio	(E) Loss Cost Modification Factor	(F) Selected Loss Cost Multiplier	(G) Expense Constant (If Applicable)	(H) Co. Current Loss Cost Multiplier
Auto BI	**+9.5%**	**+5.9%**					
Auto PD	**+4.7%**	**+2.8%**					
Auto UM/UIM	**+26.3%**	**+16.4%**					
Auto PIP	**+50.2%**	**+23.6%**					
Auto OTC/COLL	**+15.4%**	**+8.4%**					
Auto RNT	**+8.7%**	**+6.6%**					
TOTAL OVERALL EFFECT	**+13.1%**	**+6.62%**					

6. 5 Year History Rate Change History

Year	Policy Count	% of Change	Effective Date	State Earned Premium (000)	Incurred Losses (000)	State Loss Ratio	Countrywide Loss Ratio
2007	**6,206**	**5.07%**	**12/17**	**4,975**	**3,873**	**77.8%**	**87.6%**
2008	**6,206**	**7.75%**	**5/15**	**4,975**	**3,873**	**77.8%**	**87.6%**

7.

Expense Constants	Selected Provisions
A. Total Production Expense	**15.5%**
B. General Expense	**7.5%**
C. Taxes, License & Fees	**2.0%**
D. Underwriting Profit & Contingencies	**5.0%**
E. Other (explain)	
F. TOTAL	**30.0%**

8. **N** Apply Lost Cost Factors to Future filings? (Y or N)

9. **29.0%** Estimated Maximum Rate Increase for any Insured (%). Territory (if applicable): _____

10. **-47%** Estimated Maximum Rate Decrease for any Insured (%) Territory (if applicable): _____

Property & Casualty Transmittal Document (Revised 1/1/05)

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:
	f. State Filing #:
	g. SERFF Filing #:

3.	Group Name	Group NAIC #
	Imperial Management Group	20499

4.	Company Name(s)	Domicile	NAIC #	FEIN #
	Imperial Fire & Casualty Insurance Company	LA	44369	721171736

5.	Company Tracking Number	IFACAR20081215R

Contact Info of Filer(s) or Corporate Officer(s) [include toll-free number]

6.	Name and address	Title	Telephone #s	FAX #	e-mail
	Carrie A. Hewett 14800 Quorum Dr, St 250 Dallas, TX 75254	Director of Product Management	972-267-8929 x175	972-590-3228	carrie.hewett@imperialfire.com

7.	Signature of authorized filer	
8.	Please print name of authorized filer	Carrie A. Hewett

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

9.	**Type of Insurance (TOI)**	19.0 Personal Auto
10.	**Sub-Type of Insurance (Sub-TOI)**	19.0001 Private Passenger Auto (PPA)
11.	**State Specific Product code(s)(if applicable)[See State Specific Requirements]**	
12.	**Company Program Title** (Marketing title)	Imperial Summit
13.	**Filing Type**	[ ] Rate/Loss Cost [ ] Rules [X] Rates/Rules [ ] Forms [ ] Combination Rates/Rules/Forms [ ] Withdrawal[ ] Other (give description)
14.	**Effective Date(s) Requested**	New: 12/15/2008 Renewal: 1/14/2009
15.	**Reference Filing?**	[ ] Yes [X] No
16.	**Reference Organization** (if applicable)	n/a
17.	**Reference Organization # & Title**	n/a
18.	**Company's Date of Filing**	11/18/08
19.	**Status of filing in domicile**	[ ] Not Filed [X] Pending [ ] Authorized [ ] Disapproved

Property & Casualty Transmittal Document—

20.	**This filing transmittal is part of Company Tracking #**	**IFACAR20081215R**

21.	**Filing Description** [This area should be similar to the body of a cover letter and is free-form text]

Imperial Fire & Casualty Insurance Company (Imperial) first introduced the Imperial Summit product on July 10, 2006. Since that time, it has become evident that the initial pricing was not adequate to maintain a profitable product. The rate level indication as of September 30, 2008 is +9.4%. Due to this, we are proposing an overall rate increase of 6.62% which consists of base rate, symbol, and tier factor changes. We are also adding a driver to vehicle ratio factor.

In addition, we are revising the limit on stated value vehicles from $100,000 to $60,000 in the rules.

We believe that our rates are adequate, not excessive, nor unfairly discriminatory, and that they are compliant with Arkansas law.

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]

Check #:
Amount: $100.00

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

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

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.)

1.	**This filing transmittal is part of Company Tracking #**	**IFACAR20081215R**

2.	**This filing corresponds to form filing number** (Company tracking number of form filing, if applicable)	

X Rate Increase ☐ Rate Decrease ☐ Rate Neutral (0%)

3.	**Overall percentage rate impact for this filing**	6.62%
4.	**Effect of Rate Filing – Written premium change for this program**	$382,036
5.	**Effect of Rate Filing – Number of policyholders**	6,206
6.	**Filing Method (Prior Approval, File & Use, Flex Band, etc.)**	File & Use

7. Rate Change by Company

Company Name	Percentage Change for this program	# of policyholders for this program	Written premium for this program
Imperial Fire & Casualty	6.62%	6,206	$5,770,937

8.	**Overall percentage of last rate revision**	7.75%
9.	**Effective Date of last rate revision**	5/15/2008
10.	**Filing Method of Last filing (Prior Approval, File & Use, Flex Band, etc.)**	File & Use

11.	**Exhibit Name/Description /Synopsis**	**Rule # or Page #**	**Replacement or withdrawn?**	**Previous state filing number, if required by state**
01	Rate Tables – Rate Order of Calculation	Page 16	[X] Replacement [ ] Withdrawn [ ] Neither	95446
02	Rate Tables – Base Rates	Page 18	[X] Replacement [ ] Withdrawn [ ] Neither	95446
03	Rate Tables – Tier Factors	Page 33-34	[X] Replacement [ ] Withdrawn [ ] Neither	95446
04	Rate Tables - Symbols	Page 37-40	[X] Replacement [ ] Withdrawn [ ] Neither	95446
05	Rate Tables – Driver to Vehicle Ratio	Page 49	[ ] Replacement [ ] Withdrawn [X] Neither	

To be complete, a rate/rule filing must include the following:

1. A completed Rate/Rule Filing Transmittal document (PC RRFS-1) (Do not refer to the body of the filing for the component/exhibit listing.) and,
2. A completed Property & Casualty Transmittal Document (PC TD-1) and,
3. One copy of all rate/rule components/exhibits submitted with the filing, and
4. The appropriate state review requirements, if required, and
5. The appropriate filing fees, if required, and
6. A postage-paid, self-addressed envelope large enough to accommodate the return
7. You should refer to the each state's checklist for additional state specific requirements (i.e. # of additional copies required, other state specific forms, etc.)

Imperial Fire & Casualty Insurance Company
Private Passenger Automobile
Arkansas Summit
Rate Change Impact
New Business Effective 12/15/2008
Renewals Effective 01/14/2009

Overall Rate Impact

Coverage	Base Rate	UW/Credit Tier	Drv to Veh Ratio	Phys Dam Symbol	Liability Symbol	2007 NWP	Combined Change
BI	1.5%	3.7%	-1.3%	0.0%	2.0%	1,373,945	6.0%
PD	-1.5%	3.7%	-1.3%	0.0%	2.0%	1,404,537	2.8%
OTC	26.7%	4.1%	0.0%	3.1%	0.0%	419,972	35.9%
COLL	0.7%	3.7%	-1.3%	-2.5%	0.0%	1,479,329	0.5%
Loan/Lease	0.0%	4.1%	0.0%	3.1%	0.0%	3,127	7.3%
PIP Med	14.3%	12.4%	-1.5%	0.0%	2.8%	45,823	30.0%
PIP Dis	0.0%	12.4%	-1.5%	0.0%	2.8%	13,965	13.8%
PIP Death	0.0%	12.4%	-1.5%	0.0%	2.8%	15,840	13.8%
UMBI	5.4%	12.4%	-1.5%	0.0%	2.8%	62,997	20.0%
UIMBI	11.1%	12.4%	-1.5%	0.0%	2.8%	19,092	26.4%
UMPD	12.1%	3.7%	-1.3%	-2.5%	0.0%	90,982	11.9%
TOW	0.0%	0.0%	0.0%	0.0%	0.0%	8,493	0.0%
RNT	6.6%	0.0%	0.0%	0.0%	0.0%	35,558	6.6%
AEQ	0.0%	0.0%	0.0%	0.0%	0.0%	1,764	0.0%
OTC Trailers	0.0%	0.0%	0.0%	0.0%	0.0%	-	0.0%
COLL Trailers	0.0%	0.0%	0.0%	0.0%	0.0%	-	0.0%
BI/PD Change	0.0%	3.7%	-1.3%	0.0%	2.0%	2,778,481	4.4%
OTC/COLL Change	6.5%	3.8%	-1.0%	-1.3%	0.0%	1,899,300	8.4%
Overall Rate Impact	3.0%	4.0%	-1.2%	-0.5%	1.2%	4,975,423	**6.62%**

Imperial Fire & Casualty Insurance Company
Rate Level Indication
Experience Period: 7/1/2006 to 9/30/2008
Arkansas Summit - Credit

	Incurred Method	Paid Method	Selected
(1) Direct Earned Premium	10,625,977	10,625,977	
(2) Current Rate Level Factor	1.106	1.106	
(3) Earned Premium At Current Rate Level (1 x 2)	11,748,902	11,748,902	
(4) Earned Fees	566,109	566,109	
(5) Loss & ALAE	8,515,616	6,813,755	
(6) Actual Loss & ALAE Ratio (5 / 1)	80.1%	64.1%	
(7) Actual Loss & ALAE Ratio With Fees (5 / (1+4))	76.1%	60.9%	
(8) Loss Development Factor to Ultimate	1.042	1.226	
(9) Indicated Ultimate Loss & ALAE (5 x 8)	8,877,128	8,356,760	
(10) Projected Loss Trend	1.026	1.026	
(11) Developed, Trended Loss & ALAE (9 x 10)	9,105,085	8,571,354	
(12) On-Level Adjusted Loss & ALAE Ratio (11 / 3)	77.5%	73.0%	76.6%
(13) Permissible Loss & ALAE Ratio	70.0%	70.0%	70.0%
(14) Rate Level Indication (12 / 13 -1)	10.7%	4.2%	9.4%
(15) Pending Rate Change			
(16) Expected Loss & ALAE Ratio (12 / (1+15))	77.5%	73.0%	76.6%
(17) Expected Rate Level Indication (16 / 13-1)	10.7%	4.2%	9.4%

(2) Current Rate Level Factor Adjusts Premium to Account for Rate Changes

Rate Change History

Date	Overall Impact	Cumulative Impact
12/17/07	5.1%	5.1%
05/15/08	7.7%	13.2%

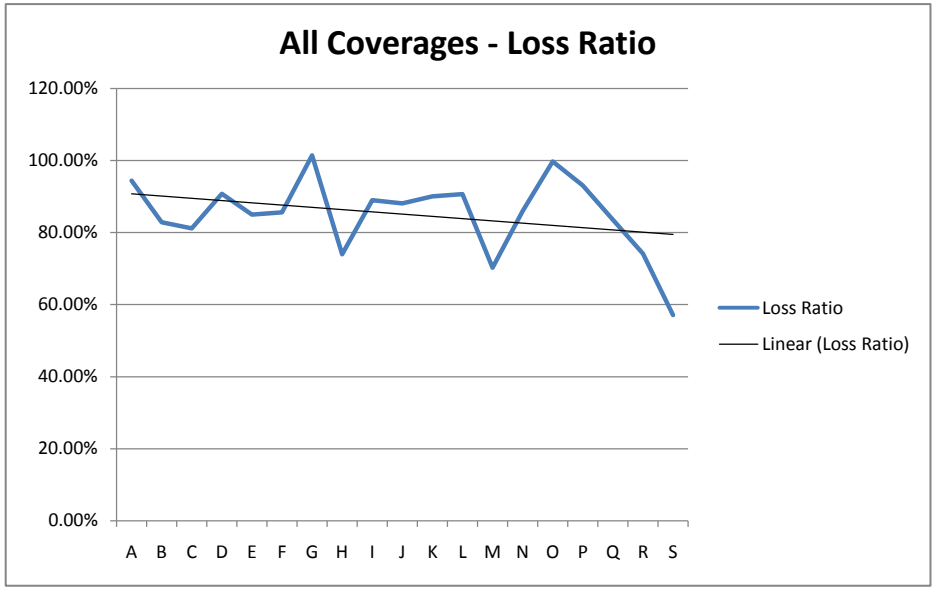
(3) Premium Represented at Current Prices
(8) Accounts for Future Claim Payments (Based on IFAC Quarterly Loss Development)
(9) Loss & ALAE Including Future Payments
(10) Inflation for the Time Period Being Considered
(12) Loss Ratio Taking into Account Premium at Current Prices & Losses with Future Payments and Inflation
(13) The Target Loss Ratio - Our Goal
(14) The Amount of Rate Increase or Decrease We Need to Hit Our Loss Ratio Goal
(15) No Pending Rate Change at This Time
(16) New Loss Ratio with Pending Rate Change Taken Into Account
(17) The Amount of Rate Increase or Decrease Still Needed to Hit Our Loss Ratio Goal

Imperial Fire & Casualty Insurance Company
Private Passenger Auto - Summit Program
Proposed Rate Impact on Policy # 00008347

Unit Number	Coverage	Current Premium	Proposed Premium	Tier 9A Current	Tier 9A Proposed	Symbol Current	Symbol Proposed	Drv to Veh Current	Drv to Veh Proposed
1	BI	$ 36.00	$ 63.00	0.58	0.84	1.03	1.25	1.00	1.00
1	COL	$ 137.00	$ 151.00	0.61	0.85	1.52	1.20	1.00	1.00
1	OTC	$ 49.00	$ 71.00	0.60	0.79	1.24	1.36	1.00	1.00
1	PAD	$ 5.00	$ 6.00	0.45	0.51	1.20	1.25	1.00	1.00
1	PD	$ 28.00	$ 49.00	0.58	0.84	1.03	1.25	1.00	1.00
1	PID	$ 5.00	$ 6.00	0.45	0.51	1.20	1.25	1.00	1.00
1	PMP	$ 14.00	$ 17.00	0.45	0.51	1.20	1.25	1.00	1.00
1	REN	$ 24.00	$ 24.00	0.70	0.70	1.00	1.00	1.00	1.00
1	TOW	$ 6.00	$ 6.00	1.00	1.00	1.00	1.00	1.00	1.00
1	UBI	$ 8.00	$ 10.00	0.45	0.51	1.20	1.25	1.00	1.00
1	UIM	$ 5.00	$ 6.00	0.45	0.51	1.20	1.25	1.00	1.00
1	UPD	$ 32.00	$ 35.00	0.61	0.85	1.52	1.20	1.00	1.00
2	BI	$ 35.00	$ 51.00	0.58	0.84	1.00	1.00	1.00	1.00
2	PAD	$ 5.00	$ 6.00	0.45	0.51	1.00	1.00	1.00	1.00
2	PD	$ 28.00	$ 41.00	0.58	0.84	1.00	1.00	1.00	1.00
2	PID	$ 5.00	$ 6.00	0.45	0.51	1.00	1.00	1.00	1.00
2	PMP	$ 15.00	$ 17.00	0.45	0.51	1.00	1.00	1.00	1.00
2	UBI	$ 9.00	$ 10.00	0.45	0.51	1.00	1.00	1.00	1.00
2	UIM	$ 5.00	$ 6.00	0.45	0.51	1.00	1.00	1.00	1.00
2	UPD	$ 11.00	$ 14.00	0.61	0.85	1.12	1.04	1.00	1.00
Total		$ 462.00	$ 595.00						
Change			29%						

Imperial Fire & Casualty Insurance Company
Private Passenger Auto - Summit Program
Tier Experience

Credit Tier	WP	EP	Vehicle Count	IL & ALAE	Loss Ratio	Loss Cost
Error	-492	-492	401	726,518	-147675.3%	1,811.77
A	3,562,608	3,083,150	11,943	2,909,217	94.36%	243.59
B	3,107,203	2,604,600	10,807	2,156,742	82.81%	199.57
C	3,775,300	3,173,798	12,967	2,574,772	81.13%	198.56
D	4,369,446	3,691,735	14,096	3,350,614	90.76%	237.70
E	4,618,918	3,910,893	15,640	3,322,591	84.96%	212.44
F	3,550,886	3,052,451	11,869	2,613,857	85.63%	220.23
G	4,375,615	3,804,695	14,774	3,858,135	101.40%	261.14
H	3,464,620	3,051,698	11,368	2,257,770	73.98%	198.61
I	2,481,197	2,156,536	7,749	1,918,821	88.98%	247.62
J	2,717,888	2,368,386	8,739	2,085,265	88.05%	238.62
K	2,630,851	2,319,414	8,634	2,087,712	90.01%	241.80
L	2,074,577	1,808,677	7,039	1,639,322	90.64%	232.89
M	1,447,071	1,278,318	4,445	897,678	70.22%	201.95
N	1,308,611	1,164,754	4,090	1,001,545	85.99%	244.88
O	1,026,063	926,757	3,047	924,088	99.71%	303.28
P	752,014	678,010	2,193	631,052	93.07%	287.76
Q	853,418	772,287	2,527	645,000	83.52%	255.24
R	572,703	517,628	1,570	383,599	74.11%	244.33
S	187,706	169,022	483	96,516	57.10%	199.83
T1	52,742	50,006	94	14,497	28.99%	154.23
T2	1,142,915	1,029,728	3,618	786,383	76.37%	217.35
T3	123,362	101,598	468	37,180	36.59%	79.44
T4	261,535	218,225	908	183,703	84.18%	202.32
U1	24,368	23,420	33	6,866	29.32%	208.07
U2	291,797	266,301	578	186,944	70.20%	323.43
U3	27,081	24,359	67	25,685	105.45%	383.36
U4	61,046	52,227	145	40,630	77.80%	280.21
U5	514,973	459,488	1,965	288,398	62.77%	146.77



Superseded Attachments

Please note that all items on the following pages are items, which have been replaced by a newer version. The newest version is located with the appropriate schedule on previous pages. These items are in date order with most recent first.

Original Date:	Schedule	Document Name	Replaced Date	Attach Document
No original date	Rate and Rule	Rate Tables - Base Rates	11/18/2008	12 Rate Tables-Base Rates.pdf
No original date	Rate and Rule	Rate Tables - Symbols	11/18/2008	14 Rate Tables-Symbols.pdf
No original date	Supporting Document	APCS-Auto Premium Comparison Survey	12/12/2008	5 APCS.xls
No original date	Supporting Document	APCS-Auto Premium Comparison Survey	12/04/2008	5 APCS.xls
No original date	Supporting Document	APCS-Auto Premium Comparison Survey	11/18/2008	5 APCS.pdf
No original date	Supporting Document	NAIC loss cost data entry document	11/18/2008	3 FORM RF-1(LC Data Entry Document).pdf
No original date	Supporting Document	Rate Change Impact	11/18/2008	6 Rate Impact-Overall.pdf

BASE RATES

	BI	PD	OTC	COLL	Loan/ Lease	PIP Med	Pip Dis	PIP Death	UMBI	UIMBI	UMPD	TOW	RENT	Custom Equipment	OTC Trailers	Coll Trailers
NEW	73.00	88.56	150.00	223.00	21.27	45.00	14.00	14.00	12.00	7.00	18.00	4.90	14.00	4.20	142.8	83.3
RENEWAL	73.00	88.56	150.00	223.00	21.27	45.00	14.00	14.00	12.00	7.00	18.00	4.90	14.00	4.20	142.8	83.3

SYMBOL FACTORS

ISO PHYS DAM SYMBOL	OTC/LOAN/LEASE FACTOR	COLL/UMPD FACTOR	
1	0.502	0.695	
2	0.537	0.721	
3	0.576	0.748	
4	0.617	0.775	
5	0.692	0.804	
6	0.740	0.834	
7	0.770	0.865	
8	0.813	0.897	
10	0.871	0.930	
11	0.933	0.964	
12	1.000	1.000	
13	1.071	1.037	
14	1.148	1.075	
15	1.230	1.115	
16	1.318	1.156	
17	1.359	1.199	
18	1.440	1.244	
19	1.570	1.290	
20	1.737	1.337	
21	1.861	1.387	
22	1.994	1.438	
23	2.136	1.491	
24	2.289	1.547	
25	2.453	1.604	
26	2.628	1.663	
27	2.816	1.725	
66	1.000	1.000	Stated Amount Vehicles
67	1.000	1.000	Conversion Vans
68a	1.000	1.000	Horse Trailer
68b	1.000	1.000	Utility Trailer
68c	2.000	2.000	Homemade Trailer
68d	1.000	1.000	Conventional Travel Trailer
68e	1.000	1.000	5th Wheel Travel Trailer
68f	1.000	1.000	Popup Travel Trailer
68g	1.000	1.000	Mounted Camper

BI/PD SYMBOLS	RATING FACTOR	PIP/UMBI/UIMBI SYMBOLS	
		450	1.000
255	1.000	455	0.800
260	0.800	460	0.800
265	0.800	465	0.800
270	0.800	470	0.800
275	0.800	475	0.800
280	0.800	480	0.800
285	0.800	485	0.850
290	0.850	490	0.900
295	0.900	495	0.950
300	0.950	500	1.000
305	1.000	505	1.050
310	1.050	510	1.100
315	1.100	515	1.150
320	1.150	520	1.200
325	1.200	525	1.250
330	1.250	530	1.250
335	1.250	535	1.250
340	1.250	540	1.250
345	1.250	545	1.250
350	1.250	550	1.250
355	1.250	555	1.250
360	1.250	560	1.250
365	1.250	565	1.250
370	1.250	570	1.250
375	1.250	575	1.250
380	1.250	580	1.250
385	1.250	585	1.250
390	1.250	590	1.250
999	1.000	999	Vehicles with no ISO Liability Symbol
65	1.000	1.000	Vehicles not requiring physical damage coverage and that do not appear on the symbol list.
66	1.000	1.000	Stated Amount Vehicles
67	1.000	1.000	Conversion Van
69	1.000	1.000	Named Non-Owner

Stated Amount Vehicles (Symbol 66)

Value Factor	OTC	Col	UMPD	Values	
				0	2500
0 to 2500	1.280	1.100	1.100	2501	5000
2501 to 5000	2.000	1.300	1.300	5001	7500
5001 to 7500	2.720	1.500	1.500	7501	10000
7501 to 10000	3.430	1.690	1.690	10001	15000
10001 to 15000	4.150	1.890	1.890	15001	20000
15001 to 20000	4.400	1.950	1.950	20001	25000
20001 to 25000	4.870	2.080	2.080	25001	30000
25001 to 30000	5.100	2.180	2.180	30001	35000
30001 to 35000	5.590	2.280	2.280	35001	40000
35001 to 40000	5.900	2.380	2.380	40001	45000
40001 to 45000	6.300	2.470	2.470	45001	50000
45001 to 50000	6.800	2.570	2.570	50001	55000
50001 to 55000	7.020	2.670	2.670	55001	60000
55001 to 60000	7.300	2.770	2.770	60001	65000
60001 to 65000	7.740	2.870	2.870	65001	70000
65001 to 70000	8.100	2.970	2.970	70001	75000
70001 to 75000	8.450	3.060	3.060	75001	80000
75001 to 80000	8.800	3.160	3.160	80001	85000
80001 to 85000	9.170	3.260	3.260	85001	90000
85001 to 90000	9.500	3.360	3.360	90001	95000
90001 to 95000	9.890	3.450	3.450	95001	100000
95001 to 100000	10.200	3.550	3.550		

Conversion Vans (Symbol 67)

Value Factor	OTC	Col	UMPD	Values	
				0	2500
0 to 2500	0.740	0.690	0.690	2501	5000
2501 to 5000	0.740	0.690	0.690	5001	7500
5001 to 7500	0.740	0.690	0.690	7501	10000
7501 to 10000	0.740	0.690	0.690	10001	15000
10001 to 15000	1.580	0.990	0.990	15001	20000
15001 to 20000	2.620	1.230	1.230	20001	25000
20001 to 25000	2.700	1.290	1.290	25001	30000
25001 to 30000	3.200	2.440	2.440	30001	35000
30001 to 35000	3.720	1.580	1.580	35001	40000
35001 to 40000	4.150	1.780	1.780	40001	45000
40001 to 45000	4.650	1.980	1.980	45001	50000
45001 to 50000	4.850	2.040	2.040	50001	55000
50001 to 55000	5.020	2.080	2.080	55001	60000
55001 to 60000	5.200	2.130	2.130	60001	65000
60001 to 65000	5.390	2.180	2.180	65001	70000
65001 to 70000	5.520	2.230	2.230	70001	75000
70001 to 75000	5.770	2.280	2.280	75001	80000
75001 to 80000	5.900	2.330	2.330	80001	85000
80001 to 85000	6.140	2.380	2.380	85001	90000
85001 to 90000	6.250	2.430	2.430	90001	95000
90001 to 95000	6.510	2.480	2.480	95001	100000
95001 to 100000	6.700	2.520	2.520		

Trailers (Symbols 68)

Value Factor	OTC	Col
0 to 2500	0.500	0.500
2501 to 5000	0.550	0.550
5001 to 7500	0.600	0.600
7501 to 10000	0.650	0.650
10001 to 12500	0.700	0.700
12501 to 15000	0.750	0.750
15001 to 17500	0.800	0.800
17501 to 20000	0.850	0.850
20001 to 22500	0.900	0.900
22501 to 25000	0.950	0.950
25001 to 27500	1.000	1.000
27501 to 30000	1.050	1.050
30001 to 32500	1.100	1.100
32501 to 35000	1.150	1.150

0	2500
2501	5000
5001	7500
7501	10000
10001	12500
12501	15000
15001	17500
17501	20000
20001	22500
22501	25000
25001	27500
27501	30000
30001	32500
32501	35000

Attachment "5 APCS.xls" is not a PDF document and cannot be reproduced here.

Attachment "5 APCS.xls" is not a PDF document and cannot be reproduced here.

Private Passenger Auto Premium Comparision Survey Form

FORM APCS - last modified August 2005

NAIC Number:	44369
Company Name:	Imperial Fire and Casualty Insurance Co
Contact Person:	Carrie Hewett
Telephone No.:	972-267-8929 x175
Email Address:	carrie.hewett@imperialfire.com
Effective Date:	5/15/2008

DISCOUNTS OFFERED:

PASSIVE RESTRAINT/AIRBAG	0	%
AUTO/HOMEOWNERS	9	%
GOOD STUDENT	5	%
ANTI-THEFT DEVICE	0	%
Over 55 Defensive Driver Discount	5	%
$250/$500 Deductible Comp./Coll.	7 to 13	%

Assumptions to Use:

1 *Liability -Minimum $25,000 per person*
2 *Bodily Injury $50,000 per accident*
$25,000 per accident
3 *Property Damage $100 deductible per accident*
4 *Comprehensive & Collision $250 deductible per accident*
5 *The insured has elected to accept:*
Uninsured motorist property and bodily injury equal to liability coverage
Underinsured bodily injury equal to liability coverage
6 *Personal Injury Protection of $5,000 for medical, loss wages according to statute and $5,000 accidental*
7 *If male and female rates are different, use the highest of the two*

Submit to: *Arkansas Insurance Department*
1200 West Third Street
Little Rock, AR 72201-1904
Telephone: *501-371-2800*
Email as an attachment i insurance.pnc@arkansas.gov
You may also attach to a SERFF filing or submit on a compact disk

		Fayetteville				Trumann				Little Rock				Lake Village				Pine Bluff			
	Gender	Female	Male	Male or Female	Male or Female	Female	Male	Male or Female	Male or Female	Female	Male	Male or Female	Male or Female	Female	Male	Male or Female	Male or Female	Female	Male	Male or Female	Male or Female
Vehicle	**Coverages** / **Age**	18	18	40	66	18	18	40	66	18	18	40	66	18	18	40	66	18	18	40	66
1999 Chevrolet Silverado 1500 2WD "LS" regular cab 119" WB	*Minimum Liability*	$1,848	$2,075	$247	$249	$1,868	$2,085	$256	$254	$3,473	$3,884	$467	$473	$1,643	$2,396	$224	$225	$2,257	$2,496	$317	$312
	Minimum Liability with Comprehensive and Collision	$3,235	$3,948	$462	$452	$2,980	$3,670	$456	$439	$4,688	$5,611	$675	$666	$3,036	$3,785	$469	$453	$3,432	$4,139	$524	$503
	100/300/50 Liability with Comprehensive and Collision	$3,811	$4,614	$528	$527	$3,552	$4,330	$523	$513	$5,816	$6,917	$806	$811	$3,571	$4,403	$532	$521	$4,118	$4,930	$604	$592
2003 Ford Explorer 'XLT' 2WD, 4 door	*Minimum Liability*	$1,919	$2,185	$250	$256	$1,922	$2,186	$255	$259	$3,577	$4,058	$464	$477	$1,695	$1,931	$223	$230	$2,288	$2,575	$308	$310
	Minimum Liability with Comprehensive and Collision	$4,151	$5,253	$592	$579	$3,848	$4,930	$588	$567	$5,749	$7,129	$824	$812	$3,998	$5,178	$620	$599	$4,271	$5,365	$645	$624
	100/300/50 Liability with Comprehensive and Collision	$4,797	$6,000	$665	$661	$4,487	$5,668	$662	$648	$7,011	$8,591	$974	$974	$4,597	$5,871	$691	$675	$5,037	$6,253	$736	$722
2003 Honda Odyssey "EX"	*Minimum Liability*	$1,550	$1,761	$207	$210	$1,568	$1,774	$212	$212	$2,876	$3,251	$385	$386	$1,384	$1,573	$188	$188	$1,870	$2,095	$259	$254
	Minimum Liability with Comprehensive and Collision	$3,494	$4,472	$510	$496	$3,287	$4,259	$518	$494	$4,745	$5,951	$703	$681	$3,447	$4,519	$553	$525	$3,610	$4,585	$564	$536
	100/300/50 Liability with Comprehensive and Collision	$3,959	$5,010	$564	$555	$3,750	$4,794	$571	$554	$5,659	$7,008	$808	$798	$3,881	$5,020	$603	$582	$4,165	$5,229	$629	$608
2005 Toyota Camry LE 3.0L 4 door Sedan	*Minimum Liability*	$1,783	$2,010	$244	$244	$1,819	$2,038	$253	$250	$3,313	$3,712	$453	$452	$1,607	$1,807	$225	$223	$2,192	$2,430	$313	$303
	Minimum Liability with Comprehensive and Collision	$3,715	$4,726	$545	$526	$3,485	$4,476	$545	$519	$5,048	$6,279	$749	$725	$3,647	$4,738	$580	$551	$3,862	$4,855	$604	$571
	100/300/50 Liability with Comprehensive and Collision	$4,192	$5,278	$601	$588	$3,957	$5,022	$601	$578	$5,981	$7,358	$858	$844	$4,090	$5,249	$633	$608	$4,428	$5,511	$670	$644
2003 Cadillac Seville "STS" 4 door Sedan	*Minimum Liability*	$1,699	$1,962	$226	$228	$1,721	$1,982	$231	$233	$3,103	$3,549	$410	$414	$1,531	$1,775	$206	$208	$2,021	$2,302	$277	$275
	Minimum Liability with Comprehensive and Collision	$4,372	$5,794	$642	$617	$4,129	$5,523	$646	$614	$5,608	$7,279	$833	$803	$4,416	$5,967	$701	$665	$4,384	$5,770	$681	$647
	100/300/50 Liability with Comprehensive and Collision	$4,806	$6,296	$693	$673	$4,559	$6,021	$697	$668	$6,458	$8,264	$932	$912	$4,819	$6,432	$749	$716	$4,900	$6,368	$740	$713
1998 Chevrolet Cavalier LS 4D Sedan	*Minimum Liability*	$1,947	$2,195	$261	$263	$1,970	$2,208	$270	$269	$3,644	$4,086	$491	$496	$1,737	$1,951	$237	$238	$2,374	$2,634	$333	$327
	Minimum Liability with Comprehensive and Collision	$3,718	$4,628	$535	$522	$3,450	$4,337	$532	$510	$5,243	$6,387	$763	$749	$3,558	$4,527	$557	$534	$3,901	$4,799	$600	$575
	100/300/50 Liability with Comprehensive and Collision	$4,307	$5,310	$604	$598	$4,034	$5,011	$601	$586	$6,396	$7,723	$897	$897	$4,105	$5,159	$621	$604	$4,602	$5,609	$681	$666

NAIC LOSS COST DATA ENTRY DOCUMENT

1.	This filing transmittal is part of Company Tracking #	**IFACAR20081215R**

2.	If filing is an adoption of an advisory organization loss cost filing, give name of Advisory Organization and Reference/ Item Filing Number	**N/A**

		Company Name		Company NAIC Number
3.	**A.**	**Imperial Fire & Casualty Insurance Company**	**B.**	**44369**

		Product Coding Matrix Line of Business (i.e., Type of Insurance)		Product Coding Matrix Line of Insurance (i.e., Sub-type of Insurance)
4.	**A.**	**Personal Auto**	**B.**	**Private Passenger Auto (PPA)**

5.

(A) COVERAGE (See Instructions)	(B) Indicated % Rate Level Change	(C) Requested % Rate Level Change	FOR LOSS COSTS ONLY (D) Expected Loss Ratio	(E) Loss Cost Modification Factor	(F) Selected Loss Cost Multiplier	(G) Expense Constant (If Applicable)	(H) Co. Current Loss Cost Multiplier
Auto BI	**+9.5%**	**+5.9%**					
Auto PD	**+4.7%**	**+2.8%**					
Auto UM/UIM	**+26.3%**	**+16.4%**					
Auto PIP	**+50.2%**	**+23.6%**					
Auto OTC/COLL	**+15.4%**	**+8.4%**					
Auto RNT	**+8.7%**	**+6.6%**					
TOTAL OVERALL EFFECT	**+13.1%**	**+6.62%**					

6. 5 Year History Rate Change History

Year	Policy Count	% of Change	Effective Date	State Earned Premium (000)	Incurred Losses (000)	State Loss Ratio	Countrywide Loss Ratio
2007	**6,206**	**5.07%**	**12/17**	**4,975**	**3,873**	**77.8%**	**87.6%**
2008	**6,206**	**7.75%**	**5/15**	**4,975**	**3,873**	**77.8%**	**87.6%**

7.

Expense Constants	Selected Provisions
A. Total Production Expense	**15.5%**
B. General Expense	**7.5%**
C. Taxes, License & Fees	**2.0%**
D. Underwriting Profit & Contingencies	**5.0%**
E. Other (explain)	
F. TOTAL	**30.0%**

8. **N** Apply Lost Cost Factors to Future filings? (Y or N)

9. **99.0%** Estimated Maximum Rate Increase for any Insured (%). Territory (if applicable): _____

10. **-47%** Estimated Maximum Rate Decrease for any Insured (%) Territory (if applicable): _____

Imperial Fire & Casualty Insurance Company
Private Passenger Automobile
Arkansas Summit
Rate Change Impact
New Business Effective 12/15/2008
Renewals Effective 01/14/2009

Overall Rate Impact

Coverage	Base Rate	UW/Credit Tier	Drv to Veh Ratio	Phys Dam Symbol	Liability Symbol	2007 NWP	Combined Change
BI	3.0%	3.7%	-1.3%	0.0%	0.5%	1,373,945	5.9%
PD	0.0%	3.7%	-1.3%	0.0%	0.5%	1,404,537	2.8%
OTC	26.7%	4.1%	0.0%	3.1%	0.0%	419,972	35.9%
COLL	0.7%	3.7%	-1.3%	-2.5%	0.0%	1,479,329	0.5%
Loan/Lease	0.0%	4.1%	0.0%	3.1%	0.0%	3,127	7.3%
PIP Med	14.3%	12.4%	-1.5%	0.0%	2.8%	45,823	30.0%
PIP Dis	0.0%	12.4%	-1.5%	0.0%	2.8%	13,965	13.8%
PIP Death	0.0%	12.4%	-1.5%	0.0%	2.8%	15,840	13.8%
UMBI	5.4%	12.4%	-1.5%	0.0%	2.8%	62,997	20.0%
UIMBI	11.1%	12.4%	-1.5%	0.0%	2.8%	19,092	26.4%
UMPD	12.1%	3.7%	-1.3%	-2.5%	0.0%	90,982	11.9%
TOW	0.0%	0.0%	0.0%	0.0%	0.0%	8,493	0.0%
RNT	6.6%	0.0%	0.0%	0.0%	0.0%	35,558	6.6%
AEQ	0.0%	0.0%	0.0%	0.0%	0.0%	1,764	0.0%
OTC Trailers	0.0%	0.0%	0.0%	0.0%	0.0%	-	0.0%
COLL Trailers	0.0%	0.0%	0.0%	0.0%	0.0%	-	0.0%
BI/PD Change	1.5%	3.7%	-1.3%	0.0%	0.5%	2,778,481	4.4%
OTC/COLL Change	6.5%	3.8%	-1.0%	-1.3%	0.0%	1,899,300	8.4%
Overall Rate Impact	3.8%	4.0%	-1.2%	-0.5%	0.3%	4,975,423	**6.62%**