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INSURANCE HOLDING COMPANY SUPERVISION

HEARING

BEFORE THE

SUBCOMMITTEE ON CAPITAL MARKETS, INSURANCE, AND GOVERNMENT SPONSORED ENTERPRISES

OF THE

COMMITTEE ON FINANCIAL SERVICES

U.S. HOUSE OF REPRESENTATIVES

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INSURANCE HOLDING COMPANY SUPERVISION

Thursday, March 18, 2010

U.S. HOUSE OF REPRESENTATIVES,
SUBCOMMITTEE ON CAPITAL MARKETS,
INSURANCE, AND GOVERNMENT
SPONSORED ENTERPRISES,
COMMITTEE ON FINANCIAL SERVICES,
Washington, D.C.

The subcommittee met, pursuant to notice, at 10:07 a.m. in room 2128 Rayburn House Office Building, Hon. Paul E. Kanjorski [chairman of the subcommittee] presiding.

Members present: Representatives Kanjorski, Baca, Scott, Maloney, Moore of Wisconsin, Perlmutter, Donnelly, Foster, Adler, Kosmas, Peters; Garrett, Royce, Biggert, Posey, and Jenkins.

Chairman KANJORSKI. Good morning. The subcommittee will come to order. Without objection, all members' opening statements will be made a part of the record. First, we will have our opening statements, beginning with mine, and then we will hear from our distinguished panel.

We meet today to further examine the issue of insurance supervision, especially as it relates to holding companies. The time is right for us to delve into this complicated and important subject.

The Federal Government's intervention in American International Group has raised many questions about the existing oversight of holding companies with insurance operations. While AIG's insurance companies may not have directly caused the conglomerate's downfall, the actions of the holding company and other subsidiaries within AIG certainly could have led to serious consequences for insurance policyholders if the government had not stepped in.

During our recent debates in the House on the Wall Street Reform bill, we also tackled many questions about holding company oversight. While we already know much about the supervision of financial, bank and thrift holding companies, we now need to take the time to learn more about the regulation of insurance holding companies. I believe that today's hearing will help us to identify ways that we can further improve the financial services regulatory reform bill before it becomes law.

The vast majority of holding companies—some of which are shells and some of which are complex—are currently regulated at the State level. Additionally, the Federal Reserve System and the Office of Thrift Supervision together oversee no less than 100 entities with insurance operations. Our witnesses will help us to better

understand the current lay of the land when it comes to consolidated supervision of insurance holding companies and bank or thrift holding companies with insurance operations.

The two State commissioners with us today will specifically explain their dual roles as insurance regulators and insurance holding company supervisors. Because the failure of an insurer could affect the health of the insurance holding company, and because problems within the holding company or its subsidiaries could affect the insurers within a firm's tangled network, we need to ensure that State supervisors have strong powers to protect policyholders and ensure the solvency of any of the entities that they regulate.

In those instances where a State regulator must oversee an insurer or insurance holding company with operations outside of the State, we must also ensure that we have meaningful cooperation and communication between State regulators. Moreover, to protect our economy from systemic risk, we must ensure that there is appropriate consolidated supervision of complex insurance firms.

When depository institutions and insurers operate under the umbrella of the same holding company, both State and Federal regulators have important supervisory roles. In such instances, State commissioners maintain their role as functional regulators of any insurers within these complex entities. Federal regulators have the responsibility for oversight of any depository institutions and the holding company.

The Federal regulatory representatives with us today will help us to better appreciate the formal rules of the road as laid out in statute and regulations about where a Federal regulator's authority begins and a State regulator's power ends in these corporate amalgamations. Their testimony may also help us to discern whether or not we have regulatory overlaps or gaps, and what steps regulators have taken to address such situations.

Each of our witnesses will undoubtedly emphasize the differences between insurers and depository institutions. These distinctions are important, but they fail to address the purpose of today's hearing. The recent financial crisis has taught us that any complex financial company must have an effective umbrella supervisor who looks comprehensively at the activities and health of the whole enterprise. This includes any holding company with insurance activities.

We must further explore whether the Federal banking regulators are overseeing too few or too many holding companies with insurance operations, and whether they are appropriately focused on consolidated oversight issues. We should also ask whether consolidated supervision is diversified among too many regulators, such that it has become ineffective or an afterthought.

In sum, these are difficult policy issues, and the answers we receive will undoubtedly lead to new questions.

Fortunately, we have already identified a way to examine these matters after we finish this hearing. One important provision of the House-passed Wall Street Reform bill, the Administration's plan, and Senator Dodd's proposals is the creation of a Federal office to review insurance matters on a national scope. The Federal Insurance Office, for which I have advocated for a number of years,

should look at these very questions to advise Congress on these important policy matters in the future.

Now, the gentleman from New Jersey is recognized for 5 minutes.

Mr. GARRETT. I thank the gentleman, and I thank the members of the panel who are here today.

Insurance holding company supervision obviously is a very complex topic and I think the hearing today will help members be able to delve into it and get a better understanding of how insurance companies are structured, how they're operated, and how they're regulated. And as I have delved deeper into this issue and the way that insurers are regulated within holding companies, either through insurance holding companies, financial holding companies or thrift holding companies, my belief that the problems are really more attributed to failures by regulators as opposed to gaps in regulatory structures continues to be reinforced.

So while I do agree that there are a number of areas out there within our insurance regulatory system that do need to be updated and modernized, I believe we must be really careful and deliver it in our approach. The insurance industry as a whole, I think, has performed better than most other parts of the financial sector during this crisis. And so we must ensure that we first do no harm in whatever we do.

I know my friend and colleague, who is not here right now, Mr. Royce, has continually pointed out that the securities lending problems with the AIG situation highlight the problems with State-based regulation, and he says it shows the need to have a larger Federal role in the regulating of the insurance companies. And I would remind him, while the losses attributed to securities lending were significant, had it not been for the cascade of problems with AIG's Financial Products Unit, the FP, that company would have been able to handle those losses without the need of taxpayer support.

Now, once the Office the Thrift Supervision had the Federal regulatory authority over AIG, and they had the power to oversee AIG's FP leverage, they unfortunately failed to identify and correct that problem. And this is really a prime example of the regulator not doing their job; and, it's not really a problem of a gap in regulation. I would even argue that if the securities lending operations of the insurers had been handled by the Federal regulators in this case, things might actually have been much worse than they were.

I agree that the securities lending by insurance companies, as I said at the outset, needs additional reforms, and I do look forward to hearing from the Commissioner and Director Frohman, as well, Mr. Dilweg and Ms. Frohman on what reforms have already been made in these areas and other solutions as well. Now, on another topic, though, I would like to briefly discuss a major concern I had with Chairman Dodd's recent release of a financial regulatory reform draft.

The Dodd package has a provision that would require an up-front tax on any bank holding company with assets greater than $50 billion. Also, Dodd's plan would tax any financial company, including insurers, who present an extremely low risk with greater than $50 billion in assets after any systemic event occurred. I believe that

this tax would simply lead to higher costs for consumers and additional job losses in the private sector as well.

I also believe that we greatly increase the moral hazard within the financial sector. I would like to read a quote from the recently released White Paper from the Property Casualty and Insurers Association of America regarding the topic of using the absolute size of a financial company as the basis for determining a systemic risk. The paper states, "Such a process, if enacted, would create a cross subsidy of significant magnitude from firms that do not pose a systemic risk to those firms whose activities are systemically risky. So the resulting moral hazard would encourage increased risk-taking, and as such could ultimately defeat the legislation's intent of reducing the economy's exposure to systemic risk."

So ultimately, we need a system here in place that can allow big companies to fail without being bailed out either by the taxpayer or by the consumer as his proposal would allow. So while I agree that there are numerous areas of insurance regulation that need to be addressed and updated and modernized, I believe that the main problems here really were with regulators and not the structure of the regulation.

So, once again, I thank my good friend from Pennsylvania for holding this important hearing, and also for the education that we're going to get today. And I look forward to hearing from all the witnesses.

Chairman KANJORSKI. Thank you very much, Mr. Garrett. Now we will hear from Mr. Posey.

Mr. POSEY. Thank you very much, Mr. Chairman. To help protect our citizens in the future, I think we probably need to glance at least a little bit on some of our previous failures. And I understand the Office of Thrift Supervision is responsible for supervising 35 holding companies that include both thrifts and insurance operating entities. And it has come to my attention through a news clip actually, just this morning, some revelations I had not previously been aware of and we might possibly clarify in some of our testimony this morning. This was "Dateline Washington."

It says, "Banks weren't the only ones giving big bonuses in the boom years before the worst financial crisis in generations. The government was also handing out millions of dollars to bank regulators rewarding 'superior' work, even as an avalanche of risky mortgages helped create the meltdown. The payments detailed in the payroll data released to the Associated Press under the Freedom of Information Act are the latest evidence of the government's false sense of security during the go-go days of the financial boom. Just as the bank executives got bonuses, despite taking on dangerous amounts of risk, regulators got taxpayer funded bonuses despite missing or ignoring signs that the system was on the verge of a meltdown.

"The bonuses were part of a program, little known outside the government. Some government regulators got tens of thousands of dollars in perks, boosting their salaries by almost 25 percent. Often, though, rewards amounted to just a few hundred dollars for employees who came up with good ideas. During the 2000 306 boom, the three agencies that supervised most U.S. banks, the Federal Deposit Insurance Corporation, the Office of Thrift Super-

vision, and the Office of the Comptroller of the Currency, gave out at least $19 million in bonuses, records show.

"Nearly all that money was spent recognizing superior performance. The largest share, more than $8.4 million, went to financial examiners, those examiners and managers who scrutinize internal bank documents and sound first alarms. Analysts, auditors, economists, and criminal investigators also got rewards. After the meltdown, the government's internal investigators surveyed the wreckage of nearly 200 failed banks and repeatedly found that those regulators had not done enough.

"'OTS did not react in a timely or forceful manner to certain repeated indications of problems,' the Treasury Department's Inspector General said of the Thrift Supervision Office following the $2.5 billion collapse of Net Bank, the first major bank failure of the economic crisis. 'OCC did not issue a formal enforcement action in a timely manner and was not aggressive enough in the supervision of A&B in light of the bank's rapid growth,' the Inspector General said of the currency comptroller after the $2.1 billion failure of A&B Financial National Association.

"'In retrospect, a stronger supervisory response at earlier examinations may have been prudent,' FDIC's inspector general concluded following the $1.8 billion collapse of the New Frontier Bank. 'OTS examiners did not identify or sufficiently address the core weaknesses that ultimately caused a thrift to fail until it was too late,' Treasury's Inspector General said regarding IndyMac, which in 2008 became one of the largest bank failures in history. And they believed their supervision was adequate. We disagree.

"'OCC's supervision of Omni National Bank was inadequate,' Treasury investigators concluded following Omni's $956 million failure. Most of the bank inspection records are not public and the government blacked-out many of the employee names before releasing the bonus data. It is impossible to determine how many auditors got bonuses, despite working on major banks that failed. Regulators say it's unfair to use those missteps seeing it's a benefit of hindsight to suggest any bonus isn't proper."

Thank you, Mr. Chairman. I yield back.

Chairman KANJORSKI. Thank you very much, Mr. Posey. And now, for the roadrunner from—I mean Mr. Royce—from California.

Mr. ROYCE. Thank you, Mr. Chairman. And I thank you for your continued leadership on this issue as well.

Looking at the regulatory reform package that passed out of the House last year, and at the Dodd bill that was recently introduced in the Senate, I think a fundamental question should have been asked much more often; and, I think that question has not been asked at all really, or dealt with. The question is, what is the most efficient and effective form of regulation? I think if we applied that question to the insurance market, I would be hard-pressed to find someone who thought the status quo was the most effective and efficient regulatory model.

We have 51 different regulators, and 51 different sets of rules. Frankly, in a vulcanized way, we have 51 separate markets, many of which are stymied by bureaucratic red tape, by price controls. Europe has developed a very different model to deal with this, which is one market for all of Europe, and here we are vulcanized.

Certainly, the framers of the Constitution did not envision this when they threw out the Articles of Confederation and included the Commerce Clause. Even the framers of the NAIC had a different version and a different vision for our insurance market. George Miller, the founder, said back in 1871, "The Commissioners are now fully prepared to go before their various legislative committees with recommendations for a system of insurance law which shall be the same in all States, not reciprocal, but identical; not retaliatory, but instead a uniform, one system."

Unfortunately, Mr. Miller's words were unheeded, and today we are left with an 18th Century regulatory model attempting to oversee this vast and complicated marketplace. And that is why I have joined Melissa Bean in introducing legislation to create a national insurance charter. This approach puts us closer to what the founding fathers had envisioned by creating one national market.

Our legislation is no panacea. No form of regulation ever is. But it is a drastic improvement over the status quo, which is little more than an antiquated beast, frankly. It is something that the framers gave up on long ago, and I look forward to continuing the discussion on the need to establish a competent Federal insurance regulator and bringing our regulatory model into the 21st Century.

Again, I would like to thank the chairman for his continued work on this issue, and let's learn from what's happening in the rest of the world with liberalized markets and a regulatory scheme for one market for all of Europe. We have to compete with this, and we are not going to be able to. And, frankly, our current system does not work.

I yield back the balance of my time, Mr. Chairman.

Chairman KANJORSKI. Thank you very much, Mr. Royce. Now, I will get to the panel.

First of all, thank you very much for appearing today, and without objection, your written statements will be made a part of the record. You will each be recognized for a 5-minute summary of your testimony.

First, we have Mr. Jon Greenlee, Associate Director, Division of Banking Supervision and Regulation, Federal Reserve Board of Governors. Mr. Greenlee?

STATEMENT OF JON D. GREENLEE, ASSOCIATE DIRECTOR, DIVISION OF BANKING SUPERVISION AND REGULATION, BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM

Mr. GREENLEE. Thank you. Chairman Kanjorski, Ranking Member Garrett, and members of the subcommittee, thank you for the opportunity to discuss the supervision and oversight of insurance companies.

As you are aware, in this country the primary supervision and regulation of insurance companies is vested with the States. The Federal Reserve does serve as the consolidated supervisor of bank holding companies and financial holding companies established under the Gramm-Leach-Bliley Act, some of which are affiliated with insurance companies.

The Federal Reserve is also the primary Federal regulator of State member banks, many of which are engaged in the sale of insurance products. Of the approximately 550 foreign and domestic

financial holding companies supervised by the Federal Reserve, 33 are engaged in insurance underwriting activities. As the consolidated supervisor of bank holding companies and financial holding companies, the Federal Reserve routinely conducts inspections of these organizations to ensure that the consolidated organization remains strong and the holding company and its non-bank affiliates do not pose a threat to the company's insured depository institution subsidiaries.

To further our supervisory efforts, we issued enhanced guidance on consolidated supervisory expectations in 2008 that underscored the importance of examiners evaluating firm-wide risk exposures. We also reiterated the importance of Federal Reserve supervisors working with the primary regulator of a bank holding company's insured depository institutions as well as State insurance supervisors and other functional regulators.

Recent experience shows the need for the consolidated supervision of bank holding companies in addition to and distinct from the supervision of the organization's bank or functionally regulated subsidiaries. Large organizations increasingly operate and manage their businesses on an integrated basis with little regard for the corporate boundaries that typically define the jurisdictions of individual, functional supervisors.

Indeed, the crisis has highlighted the financial, managerial, operational, and reputational linkages among the bank, securities, commodity, insurance, and other units of financial firms. With respect to financial holding companies engaged in insurance activities, our consolidated supervisory framework involves the same principles used for bank holding companies more broadly. This begins with an assessment of the potential risk insurance activities pose to the consolidated organization and its depository affiliates.

We make appropriate adjustments to our assessment of the firm's risk management practices and overall financial condition to account for the unique risks and the nature of insurance products on underwriting activities. As part of our process, we routinely communicate with the appropriate insurance regulatory authorities about the nature of and risk posed by a firm's insurance activities. To facilitate this information sharing, we established memoranda of understanding with the insurance regulators in all 50 States, the District of Columbia, and Puerto Rico.

We also communicate with international insurance supervisors as appropriate. The Federal Reserve also has taken several steps to support our supervisory staff and understanding the risk arising from insurance activities. We have designed and implemented training programs, and have developed a variety of insurance-related examiner tools. We also collaborated with the NAIC on three published reports to facilitate better communication and understanding of banking and insurance regulatory framework risks and capital requirements.

In closing, the current financial crisis has clearly demonstrated that risk to the financial system can arise not only in the banking sector, but also from the activities of other financial firms, such as investment banks or insurance companies that traditionally have not been subject to the type of regulation and consolidated supervision applicable to bank holding companies. As Chairman

Bernanke stated yesterday, it is important to close this gap in our regulatory structure, and legislative action is needed that would subject all systemically important financial institutions to the same framework for consolidated prudential supervision that currently applies to bank holding companies.

I would like to thank the committee for holding this important hearing, and I am happy to answer any questions that you may have. Thank you.

[The prepared statement of Mr. Greenlee can be found on page 71 of the appendix.]

Chairman KANJORSKI. Thank you very much, Mr. Greenlee.

Next, we will hear from Ms. Grovetta Gardineer, Managing Director of Corporate and International Activities, Office of Thrift Supervision.

Ms. Gardineer?

STATEMENT OF GROVETTA N. GARDINEER, MANAGING DIRECTOR FOR CORPORATE AND INTERNATIONAL ACTIVITIES, OFFICE OF THRIFT SUPERVISION

Ms. GARDINEER. Good morning, Chairman Kanjorski, Ranking Member Garrett, and distinguished members of the subcommittee. Thank you for the opportunity to testify on behalf of the Office of Thrift Supervision.

We understand that the subcommittee is interested in hearing about the scope of OTS's authority to supervise insurance savings and loan holding companies. In the few moments I have now, I would like to summarize our written testimony about OTS's approach to the supervision of savings and loan holding companies that are predominantly insurers, which I will refer to today as insurance holding companies.

I would also like to present the OTS view of how to enhance the supervision of these holding companies. OTS's role as a consolidated supervisor of an insurance holding company exists because the enterprise owns a savings association. The OTS has broad authority to supervise an insurance holding company enterprise, including its affiliates and subsidiaries.

OTS as a primary Federal regulator of savings and loan insurance holding companies has the authority to examine each insurance holding company including its subsidiaries, subject only to certain statutory obligations to coordinate with functional regulators. That said, the statutory regime governing savings and loan holding companies is premised primarily on preserving the safety and soundness of the subsidiary thrift. OTS supervises 35 insurance holding companies, the majority of which are nationwide in scope.

In addition, OTS regulates holding companies with significant insurance activities that combine securities activities as well. OTS also regulates another 39 holding companies that engage in insurance activities to a lesser degree, but are not considered predominantly insurance companies. Once a company acquires or charters a thrift institution, it becomes a savings and loan holding company, and is subject to regulatory examination and analysis by OTS.

OTS uses a risk-focused approach that considers the combined risk profile of the holding company, its financial health and sta-

bility, and the interdependence of entities within the structure. This approach incorporates the coordination and consultation with State insurance regulators in order to gain information about the functionally regulated insurance activities.

The information gathered through our examination and analysis serves as a basis for our findings regarding the insurance holding company. The primary objective of a risk-focused examination of an insurance holding company is to identify and examine the areas of the business that pose the greatest degree of risk to the condition of the overall enterprise and to the thrift, with regard to how Congress can enhance the consolidated supervision of insurance holding companies.

OTS believes that there should be a Federal oversight role for all insurance companies, not just those that own a bank or a thrift. A holding company that engages predominantly in insurance activities should be supervised by a Federal regulator that concentrates on the core business activity of the enterprise. We think it is prudent to align the regulatory authority with the holding company enterprise's primary activities.

A fundamental requirement for prudent risk management of a holding company is effective oversight and enforcement authority over the entire organization. A holding company regulator should have authority to monitor and exercise full enforcement authority over non-functionally regulated affiliates and to implement information sharing arrangements between entities in the holding company and the functional regulators.

The regulator should have the authority to impose capital requirements, restrict activities, and otherwise regulate the operations of the holding company and the non-functionally regulated affiliates. The authority to supervise the consolidated insurance holding company could be housed within a Federal insurance regulator, if Congress chose to create one. We believe that at a minimum, a Federal consolidated insurance holding company regulator should be established.

We appreciate the opportunity to share OTS's recommendations for a stronger framework that would accomplish this for insurance holding companies. We look forward to working with you on these important issues in the future, and I am very happy to respond to your questions.

Thank you.

[The prepared statement of Ms. Gardineer can be found on page 61 of the appendix.]

Chairman KANJORSKI. Thank you very much, Ms. Gardineer.

Now, I turn to my colleague from Wisconsin, Ms. Moore, for the next introduction.

Ms. MOORE OF WISCONSIN. Thank you, Mr. Chairman, and thank you for this indulgence to allow me to introduce our next panelist, the distinguished Commissioner of Insurance for the State of Wisconsin who was appointed by his excellency, Governor Jim Doyle, on January 1, 2007.

The Office of the Commissioner of Insurance is responsible for examining industry financial practices and market conduct, licensing our agents, reviewing policy forms for compliance with State legislation, and investigating consumer complaints. His agency is

also responsible for administering the State life insurance fund, the local government property insurance fund, and the injured patients and families compensation fund.

Mr. Chairman, Mr. Sean Dilweg has had a distinguished career in public service and I knew him when I was a member of the State senate. I also want to point out that he has tremendous skills as a basketball player. That matters here in the Beltway and it matters a lot to be a baller, so with much further ado, I would like to introduce Commissioner Sean Dilweg. Commissioner?

STATEMENT OF SEAN DILWEG, COMMISSIONER, STATE OF WISCONSIN, OFFICE OF THE COMMISSIONER OF INSURANCE

Mr. DILWEG. Thank you, Congresswoman Moore, and Chairman Kanjorski. I have had the privilege of working with Congresswoman Moore, I have decided, for the last 17 years in and around State and Federal Government, so I appreciate those kind words.

I am here on behalf of the NAIC, and my purpose today is really to give some insight into how State regulators assess the financial strength of an insurer and describe our unique regulatory working groups that assist and improve us in this assessment. Financial regulation is the critical component that insures our most important consumer protection, which is solvency. That basic concept guarantees that damaged automobiles are repaired and that annuity payments arrive in the mail on time, and that families hit by natural disasters can rebuild and recover.

Through the NAIC, regulators have created three core solvency surveillance mechanisms: reporting; analysis; and examination, to ensure that these obligations to policyholders, claimants, contract holders, and other parties are met both today and in the future. In our unique system of State regulation, it is imperative that the regulators around the country have access to these tools, particularly when assessing large multi-State insurers. An insurer's domestic State is relied on as the primary solvency regulator; however, any State in which a company is licensed to conduct insurance business may perform its own monitoring financial examinations and take regulatory action as appropriate. There are three NAIC working groups that deal with reporting analysis and examination. These provide the tools for us as individual State regulators to handle these complicated groups of insurance companies and individual insurance companies.

Today, in my verbal testimony, I will spend time on the financial analysis working group better known as FAWG. For over a decade, State insurance financial regulators have shared information and ideas through the NAIC's financial analysis working group, or FAWG, which exists to identify, discuss, research, and monitor potentially troubled insurers and insurance groups that are of national significance. FAWG leverages the expertise of select chief financial regulators from around the country to provide an additional layer of solvency assessment.

FAWG also helps identify market trends and emerging financial issues in the insurance sector. This council is truly a council of coequal regulators that assesses nationally significant insurers or groups. We identify these insurers or groups that exhibit characteristics of trending towards financial trouble. We interact with the

domestic regulators in lead States in order to assist and advise the appropriate regulatory strategies and methods and actions. We encourage, promote, and support coordinated multi-State efforts in addressing solvency issues.

FAWG's review of companies can be described generally as identifying the companies that are outliers when compared with benchmarks of the industry market segment, develop communications for financial staff and the Commissioner of the State, review regulator responses on identified issues, follow-up with the domestic regulator, including a presentation by the domestic regulator at many of our FAWG meetings, and, also, forming subgroups for some of our large, nationally significant insurers.

Through the FAWG forum, individual States work together to support and guide fellow regulators for the benefit of the whole in an entirely confidential process. The working group reviews and considers trends occurring within the industry. Most recently, we have looked at the residential, mortgage-backed security issue and taken steps to address that.

Finally, I wanted to touch briefly upon State insurance interaction with the Federal Government. As alluded to by earlier panelists, many individual State insurance departments in the NAIC do interact with our Federal counterparts. This occurs when there are solvency issues that affect regulatory interest beyond a particular financial services industry. Many of the same States that are FAWG members also interact with Federal agencies because of the nature of their domestic insurance market.

For example, I am the primary regulatory for two large insurers that insure municipal bonds and mortgages, respectively. I have interacted with the Federal Reserve, the U.S. Treasury, and the FHFA in order to share information of common interest on these significant companies. In conclusion, as a State-based system of regulation, we are keenly aware of our unique structure and have developed tools such as accreditation and FAWG to ensure that we are effectively and officially maximizing our resources to protect consumers and to address the solvency issues of our regulated entities.

Thank you for the opportunity to testify and I look forward to answering your questions.

[The prepared statement of Mr. Dilweg can be found on page 38 of the appendix.]

Chairman KANJORSKI. Thank you very much, Mr. Dilweg.

Finally, we will hear from Ms. Ann Frohman, director for the Nebraska Department of Insurance.

Director Frohman?

STATEMENT OF ANN M. FROHMAN, DIRECTOR, NEBRASKA DEPARTMENT OF INSURANCE

Ms. FROHMAN. Thank you, Chairman Kanjorski, and members of the subcommittee. Thank you for inviting me to testify today.

My name is Ann Frohman and I am the director of insurance for the State of Nebraska. I am here today to testify on behalf of the National Association of Insurance Commissioners. I am in the areas of group supervision of insurance companies. Before delving into group supervision, I should note that a cornerstone of our sys-

tem, which is critical to the supervising insurance groups, is our financial standards and accreditation program.

The accreditation program is a set of strong baseline standards, practices, and required skill sets for effective solvency supervision. All 50 States are currently accredited, and to stay accredited, States must adopt any changes made to the program by insurance regulators. State insurance departments are periodically reviewed by a team of their peers to ensure compliance with the 40 specific standards and 226 specific elements necessary for accreditation.

Out of necessity and for the sake of efficiency, the States have developed a strong system of cross-border supervision and coordination. Multiple jurisdictions provide peer review for insurance groups that contribute to a race-to-the-top approach. There is also routine coordination with lead State regulators of insurer groups as well as free coordination with other functional regulators when insurers are affiliated with other financial sectors.

All States and the District of Columbia have adopted the NAIC's Insurance Holding Company System Regulatory Act, designed to regulate transactions among insurers and other affiliated entities. This Act also regulates mergers and acquisitions, standards for transactions, and holding company information. This Holding Company Act requires annual filings regarding the holding company systems major transactions. These include such items as material changes to reinsurance contracts, major investments, management agreements, cost-sharing, and requests for extraordinary dividends.

The Holding Company Act outlines specific filing requirements for persons wishing to acquire control of or merge with a domestic insurer. It further requires each insured to give notice of certain material affiliated transactions so we may determine if they are fair and reasonable to the interest of the insurer.

Another important feature of the Act is that it also requires insurers to obtain prior regulatory approval for dividend transactions meeting certain thresholds in order to monitor the capital flows within a holding company system. Recent experience has shown that the activities of entities within a broader group with no connection to the insurers can still impact those insurers through contagion and reputation risk. Our system is ensuring the solvency of each individual insurance entity within an insurance group to minimize the risk to policyholders posed by these other entities within the group.

State regulators have the ability to wall-off insurers to essentially block the interconnectedness that otherwise allows risk to spread unchecked throughout a broader group. In response to the recent global financial crisis, however, U.S. regulators and international standard-setting organizations have all taken steps to improve the financial services regulatory system and encourage more frequent communications and coordination among supervisors, including State regulators.

States coordinate frequently and with other functional regulators, our Federal counterparts. We meet periodically with the Fed and the OTS prior to our NAIC meetings, as well as engage in discussions of particular companies, which is required as part of our financial analysis handbook directives. Fed and OTS representatives often attend NAIC working sessions. Additionally, the States

have memorandums of understanding agreements with these agencies to share information; however, more can be done to ensure a two-way flow of information.

State insurance regulators participate regularly in supervisory colleges for insurance-related entities around the world. This is a fairly recent phenomenon for us. For instance, my State of Nebraska, along with Delaware and Maryland, convened a supervisory college of Berkshire Hathaway a year ago. We'll have an in-person meeting in April here in Washington to gain a common understanding of the risk profile of the group and thereby strengthen our solo supervision efforts.

Additionally, we have recently enacted special legislation in Nebraska to further enhance group supervision of a major, internationally active insurer operating in the State. Group supervision of complex entities is important, but our system also demands robust supervision of individual entities, whether the parent is an insurer or not. Information sharing and supervisory collaboration are improving and the NAIC is taking further steps to strengthening its Holding Company Act. Taken together, these steps will help ensure the continued stability of the insurance sector.

Thank you for the opportunity to testify, and I would be happy to answer any questions.

[The prepared statement of Ms. Frohman can be found on page 47 of the appendix.]

Chairman KANJORSKI. Thank you very much, Ms. Frohman.

We have heard great testimony, and now it is time for our questioning. I am going to take my few moments, first. The testimony was very good, and it did not sound as contentious as it is. But if one sits here and listens, I do not think we have agreement at that table as to what is being done and what should be done in the future.

I guess my first question would go to Ms. Gardineer, in that I am interested to know whether or not you have instituted any different regulatory reforms of organizations that are associated with holding companies and insurance companies, such as AIG. As I understand it, the only regulatory authority exercised over financial products of AIG in London was your supervision of the thrift. Is that correct?

Ms. GARDINEER. Congressman, yes, our supervision of the AIG Holding Company was geared towards looking at and protecting the safety and soundness of the thrift institution. In doing so, we did coordinate with our functional regulators to understand what was going on in the insurance activities, but we also looked at other areas that were not under the purview of the functional regulators.

Chairman KANJORSKI. Who is the functional regulator?

Ms. GARDINEER. The State over the insurance activities, the insurance subsidiaries.

Chairman KANJORSKI. What State handled the insurance subsidiary for financial products in London particularly?

Ms. GARDINEER. There was no State regulator for the financial products.

Chairman KANJORSKI. Okay. So AIG, by cleverly setting up the operation in London, was successful in avoiding any regulatory au-

thority whatsoever on the insurance aspect of its business over there. Is that correct?

Ms. GARDINEER. I think that's correct, Congressman.

Chairman KANJORSKI. Now, as the regulator of the thrift, did you also go in and exercise regulatory authority over the other functions, other than the thrift, on Financial Products in London?

Ms. GARDINEER. We conducted targeted reviews of the financial products operation in the AIG holding company. Our efforts were focused domestically, but we did coordinate and have discussions with the operations.

Chairman KANJORSKI. And you found that they were in fact without collateral to support their counterparty positions of $2.8 trillion; and, you were aware of that at the time?

Ms. GARDINEER. As we went through the targeted reviews, our examiners were able to find discrepancies in the corporate governance with regard to how information was flowing back and forth from the Financial Products silo up to the senior managers, and we made them aware of those weaknesses based on what we found in the Financial Products silo.

Chairman KANJORSKI. When was this that you made somebody aware of that?

Ms. GARDINEER. I'm sorry?

Chairman KANJORSKI. When did you make somebody aware of weaknesses there?

Ms. GARDINEER. We communicated to them through our examination process.

Chairman KANJORSKI. When, though, precisely in time?

Ms. GARDINEER. I think that was in March of 2008.

Chairman KANJORSKI. Oh, that was after the beginning of the crash.

Ms. GARDINEER. Prior to that, as part of the regulatory process and through the examination process, we did communicate continually with senior management and met with the board of directors.

Chairman KANJORSKI. Well, was that back in 2007? 2006? When did you communicate with—

Ms. GARDINEER. We began those communications in 2007. They culminated in a downgrading of their holding company rating in 2008.

Chairman KANJORSKI. And, obviously, no action was taken by the supervisor regulator because there was not one. They were beyond regulation on the insurance side. So did you take any action to cause them to cease and desist what they were doing?

Ms. GARDINEER. I think it's important to remember, Congressman, that in the Financial Products activities sector, these were unregulated products by anybody in the United States.

Chairman KANJORSKI. So if they were awarding assassination contracts there, and you ran across that, since it was outside your realm of activity, they would have been allowed to go on to continue awarding those assassination contracts?

Ms. GARDINEER. I also think it's important to recognize, Congressman, that the activity of creating these credit default swaps that were in the financial products, they had stopped the origination prior to our becoming their holding company supervisor. Our examiners went in to look at the pipeline of what was left in finan-

cial products and then made the senior managers of the company aware of the weaknesses that we found.

Chairman KANJORSKI. But did you follow-through? Did anybody stop or take actions as a result of the exercise of your regulatory authority? I am not picking on you, Ms. Gardineer, but it just seems to me—the facts I know about that case—that an entity established with 400 employees in London without any assets, hard assets, only a great name, has been a subsidiary of one of the largest or the largest insurance company in the world. We are out there practicing to the tune of placing bets as high as $2.8 trillion, and that did not ring anybody's bell?

Ms. GARDINEER. We saw the concerns, Congressman, and we made our concerns. We were aware of the problems. We made the company aware of our concerns with regard to the activities. However, I think one of the things that we recognize is the holding company structure and the statutes that we operate under are designed to primarily protect the safety and soundness of the thrift institution. In the situation of AIG—

Chairman KANJORSKI. I realize that you can make the technical argument that we did not have jurisdiction, but obviously you did not assume jurisdiction of the larger problem when you saw it. As a result, somebody, particularly the American taxpayers, have suffered a $200 billion loss and are on the line for a great deal more in losses if there is further failure in that operation. Is that not correct? I am going to add: Have you changed your processes since you handled the AIG situation?

Ms. GARDINEER. One of the things that we have done is we have reviewed the processes and what we were doing at AIG. We have provided enhanced examiner guidance based on the lessons learned through our experience with the consolidated supervision of that company. By doing that, we focused on the risk management associations, sharing of information between the non-functionally regulated and functionally regulated areas. So we have taken steps to increase our supervision and enhance that supervision through examiner education.

Chairman KANJORSKI. Okay. I am running over my time, but I do want to ask you one more question. Have you sat down, or can you sit down, and recommend to this committee or to the Congress what has to be done in order to guarantee that the loophole that we have just discussed about who has regulatory authority, who has supervisory authority, where these lapses are, is vitiated in the new statute? We need certainty that one of the regulatory authorities of the United States has the responsibility and the duty to regulate these entities.

Ms. GARDINEER. Congressman Kanjorski, the Office of Thrift Supervision would be happy to sit down with Members of Congress and with you and your committee to share our experiences and try to help enhance the supervision of these types of companies.

Chairman KANJORSKI. I would appreciate it if you do that. I hope, though, when we pass regulatory reform, never again do I have to sit at a committee hearing and hear regulators saying, "Well, we do not cover that, or we do not know about that, or that is not our responsibility." We really want to close those loopholes,

and it seems to me you are the experts. You can tell us where the holes are, where the problems are.

Now, I am not going to excuse my colleagues or myself from not necessarily creating those holes in the past, and we may share the responsibility. But clearly, now, we know there was a problem. We know why that problem existed because of loopholes and gaps. Now, we need your help in covering that so that we have passed a law that there is absolutely some regulatory authority that is responsible for that entity and those gaps.

Ms. GARDINEER. And we're happy to be a part of that discussion, Congressman.

Chairman KANJORSKI. Thank you very much. I wish I could take another 5 minutes, but I cannot. Mr. Posey is anxious there, and he is going to come at you with his questions.

Mr. POSEY. Thank you, Mr. Chairman.

Mr. Chairman, I don't think any member would mind if you take another 5 minutes. This is a good line of questioning, and I think everybody here appreciates it.

Chairman KANJORSKI. Yes. I will pick it up the second round, Mr. Posey.

Mr. POSEY. Thank you, Mr. Chairman. You know, I understood that we were here to kind of review how insurance company holding regulation differs from banker thrift-holding regulation, and after listening to the testimony, it's still not really clear to me. There are a lot of gaps. It's kind of like oil and water—it just doesn't look like it's mixing very well, so I am trying to look at this stuff in as small as possible denominators.

And I think I would like to know, for example, who would regulate an insurance company, whether or not it was part of a holding company that would operate under ERISA laws, that is, under the Employee Retirement Income Security Act which would be exempt for regulation by our State insurance commissioners, what Federal agency would oversee that?

Mr. DILWEG. I guess, Congressman, I can try and comment. Let me just use an example, not that it's a troubled company at all, but when I sat down and looked at United's org chart, United Healthcare, it runs about like this. And my concern, you know, the nexus for the State regulator is the policyholder, what claims are there to be paid in the future.

My concern when I look at United is, what are the administrative charges flowing between all the different companies, and how are they affecting my company in Wisconsin? If we were to see their ERISA plan company or see one of their companies go down in California, how would that affect what's happening in Wisconsin?

We would then interact with all of our fellow State regulators and discuss a number of those issues. And just as OTS referenced, we have changed a lot of our examination processes to try and capture these potential.

Mr. POSEY. Well, I think you guys do a pretty good job. My question is, what Federal agency would oversee the people that you're not allowed to regulate?

Mr. DILWEG. That's the Department of Labor.

Mr. POSEY. The Department of Labor? Okay. We had a case in Florida where an insurance company in Indiana wrote policies in 49 States and didn't pay claims. We had somebody I knew die because they denied their claim, and now the State insurance commissioner said, well, we can't regulate them. They come under ERISA. And I said, well, this is racketeering. I mean, forget the insurance company. It is racketeering.

And it wasn't until I threatened to delete 72 of their jobs and give it to another department that would go to work, that they followed through gun indictments; and, when they made the bust, which involved 13 different State agencies between Florida and Indiana, the guy's wife was screaming. He said they would never come across State lines to get you for this. This was the first case in history I understand where State lines were crossed to prosecute healthcare fraud; and that's out and out fraud. We haven't proven fraud in a lot of these other cases yet—some bad intentions—but not necessarily out and out fraud. And so I guess we need to focus on yet another department entering the arena here that may or may not be doing a job that they're supposed to.

Back to my opening statement about some of the bonuses that were paid, in your department, Ms. Gardineer, or your agency, has anyone been terminated because of their failure to perform their job properly?

Ms. GARDINEER. Congressman, I don't have any information on the human resources information at the agency, but I would be happy to look into that and get back to you. But I don't have that information with me today.

Mr. POSEY. Okay. If possible, I would appreciate it if you would respond in writing, if it's acceptable to the Chair and to members of this committee, about my opening comments about the bonuses that were paid out, many to people who obviously weren't doing their jobs correctly. I would be interested in knowing how many people had been terminated, furloughed, demoted, or reprimanded in the department for allowing that meltdown to occur.

Ms. GARDINEER. I will look into that and gather the information. And we will respond to you in writing.

Mr. POSEY. Thank you. Thank you, Mr. Chairman.

Mr. PERLMUTTER. [presiding] The Chair now recognizes Mr. Foster from Illinois for 5 minutes.

Mr. FOSTER. Thank you, and thank you all for appearing today.

First, I was wondering if anyone is aware of any documented benefits of diversification, that is, studies where people have looked to see if the customer actually gets a better price from horizontally or vertically diversified corporations in terms of just getting a better price for insurance. And if you're aware of this, it's one of the things we're struggling with as to what are the benefits for AIG-like structures compared to self-contained smaller units. And if you're aware of any of this or could respond afterwards, if you become aware of it, I would appreciate it.

Ms. FROHMAN. I am aware of situations where in the homeowners market, in the auto market, that by pursuing coverages under one umbrella of a group, there are discounts that are available to two individuals, and so they can price competitively and take advantage of that.

Mr. FOSTER. Okay. Let's see. Another question I had, I guess, to Commissioner Dilweg and Director Frohman, does that standardization of State legislation lead to standardization of software systems to report and analyze the financial status? Is there a lot of collaboration among the States?

Mr. DILWEG. I'll start, Congressman. I think it is important to note that as we compare the data that we have compared to our European and even Federal regulators, we are very data rich. Our NAIC really houses a lot of our data that then allows me as an individual regulator not to have to duplicate on the financial solvency side the work that my counterpart in Nebraska would have done on her companies.

And so we just have thousands upon thousands of datapoints that we pull in and then utilize various tools to stress test the companies and look at, for instance, recently looking at the residential mortgage-backed securities and how those are stressed and how those are affecting the bottom line issues, the assets of the companies and their risk-based capital charges, things like that.

Mr. FOSTER. I was getting at whether there was sufficient sharing between the different States.

Mr. DILWEG. Oh. Yes, I would say it's very vibrant. I mean we could put it in much more detail for you if you would like.

Mr. FOSTER. One of the concepts in a lot of the regulatory reform is the idea of a living will, that if a holding company gets in trouble, we chop it up into little pieces. That seems like it in principle fits pretty well with the idea of State-based operating units, and I was wondering if that's a correct impression of mine that it would actually be better to have independent business units in each State when it comes time to chop the companies up into little pieces and sell them off. Or the counter argument against that is that actually operations like AIG share IT infrastructure and all this sort of stuff in ways that make it really very difficult to chop up their business units. I was wondering which one is closest to reality.

Ms. FROHMAN. We found in our experience in receiverships where we have a holding company sitting at the top of an insurance group that we work very well, even in the event that the holding company may be in bankruptcy to work out sharing payment systems and master coordination. So it does create an issue, but it hasn't been a problem in the resolution of the insurance enterprises. We jump on that right away.

Mr. FOSTER. Okay. Another one of the concepts that we are looking at is that of contingent capital in the capital structure of giant firms; and, I guess this is for Mr. Greenlee, perhaps. Whether you see that as a valid concept to apply to insurance holding companies, to basically give a market-based signal for the holding companies that the market views as running shaky operations and provide a first line of defense against the too-big-to-fail and keep the taxpayer off-the-hook when one of these gets in trouble.

Mr. GREENLEE. Thank you for the question. I think it's worth considering; we're doing a lot of work at the Federal Reserve and with our international and domestic colleagues to look at how that would work. It is my assessment that contingent capital would be available when certain triggers were hit and it would help improve the capital base and the resiliency of these firms.

Mr. FOSTER. And so your view would be that one of the jobs of the Federal Reserve would be to administer the stress test that would trigger the contingent capital conversion, or are there other schemes that you're looking at?

Mr. GREENLEE. It could be a stress test. It could be some sort of financial performance indicator. There are a lot of things that are being looked at right now. My understanding is this discussion, looking at financial performance triggers, goes on internationally. If you hit a certain capital level, if you have a certain type of market indicator, this would prompt the conversion of the capital instrument. It would not necessarily entail regulators doing a stress test and providing the results, although that could be a possibility as well.

Mr. FOSTER. Okay. Thank you. I guess I am out of time and I yield back.

Chairman KANJORSKI. Thank you very much, Mr. Foster.

Now, we will hear from Mr. Royce of California.

Mr. ROYCE. Thank you, Mr. Chairman. Mr. Chairman, despite Mr. Garrett's opening comments, I have never argued that AIG's securities lending losses are a reason for Federal regulation. What I have said, and what I'll say again, is that the State insurance commissioners had the ability to prevent those losses and they did not. There is a lot of blame to go around in the case of AIG, but to say the various State insurance commissioners are not to be included in that group is a failure to look at the facts.

AIG's Securities Lending Division used capital directly from the insurance subsidiaries. To date, the losses derived from the Securities Lending Division amount to over $40 billion. Mr. Garrett mentioned that AIG would have been okay, despite these losses. I think $40 billion would cripple any institution. Further, there are at least seven State-regulated insurance subsidiaries that were participating in AIG's Securities Lending Division that would have been insolvent but for the American taxpayers.

I would like to ask the insurance commissioners, I understand that every State has an insurance company, holding company law, and that those laws give the insurance regulator the authority to examine the activities of the holding company or other affiliates to ensure the ongoing health of the insurer itself. With regard to AIG, how were those holding company laws and the authority they granted to insurance commissioners used prior to the time the AIG crisis came t a head?

Ms. FROHMAN. Although I did not have an AIG company domesticated in my State, I can speak to the terms of what the holding company framework requires; and in terms of agreements involving U.S.-based AIG companies that are insurance operating entities, we have a number of requirements we're dealing with affiliated agreements and material transactions that would have touched the insurance company or involved the insurance company's operations. We would have required prior review of those agreements to the extent that they had a material threshold.

Mr. ROYCE. Any other commentary there?

Ms. FROHMAN. I guess in terms of where we have been with securities lending, we have in the lessons learned imposed a risk capital charge. We have also enhanced our disclosures, and prior to

the credit crisis, we were well aware of the issue and the insurance regulators had required a reduction I think by 50 percent in the securities lending activity.

Mr. ROYCE. What transpired at the time, though, in this case, is that we did not have commissioners who took a look at the health of this holding company, and, given its very varied non-insurance holdings and the fact that its financial position could harm the insurance company in the system, this turned out to be problematic, especially, when you consider that the Securities Lending Division, which has taken up roughly half of the tax dollars that have been pumped into AIG was using money directly from the AIG insurance subsidiaries, and all of those were State-regulated.

So I would ask Ms. Gardineer. Would you care to comment? Certainly, OTS had some authority over AIG. Do you agree that the various State insurance commissioners could have taken steps early on to prevent some of the damage caused by AIG?

Ms. GARDINEER. Congressman, I do recognize that with the speed that AIG Financial Products collapsed, and then ultimately the problem surfaced with regard to the securities lending subsidiaries, there were problems, as you indicated earlier, across all parts of the organization of those that are functionally regulated by the State commissioners as well as the parts that were not functionally regulated and fell to OTS for examination. It imposes a very interesting dynamic as far as all of the complexities of a company of that size when you have so many regulators who are looking into trying to figure out very complex structures of unregulated products.

Mr. ROYCE. That is my concern.

Ms. GARDINEER. I think that all of us worked as we cooperated. We talked with each other, but the events overtook us quite quickly, and there are a lot of lessons to be learned from both the Federal as well as the State side.

Mr. ROYCE. Thank you very much, Mr. Chairman.

Chairman KANJORSKI. Thank you, Mr. Royce.

Mr. Perlmutter?

Mr. PERLMUTTER. Thank you, Mr. Chairman, and I appreciate the panel being here today. Let me see if I, let's say, we have AIG. AIG is selling off big chunks of its portfolio even as we speak. So it's sold to some other insurance company or some other organization. Who watches that? Who is now in charge if AIG sells off its "something" division for $15 billion, and helps pay some of the tax dollars back? Does Nebraska take any interest in that?

Mr. DILWEG. I will give you a different example. We had QBE out of Australia buy a large company that affected 25 States, and General Casualty, Wisconsin, took the lead on that acquisition, coordinated with all the other States to get all the other State regulators involved and look at the questions that they may have surrounding such an acquisition. It would be very similar.

Neither of us have AIG subsidiaries, but it would be very similar in the scenario that you're laying out. So in reality, there becomes a lead State that will coordinate the acquisition and feed questions and detailed financial questions through to the company, so you're not getting hit by seven or eight different regulators.

Mr. PERLMUTTER. So then the acquisition occurs. Everybody said, "Okay. This is okay." Does your State remain the lead State to kind of watch this thing?

Mr. DILWEG. Where it is domiciled, we would remain the lead State, so in my example, we remain the lead State on that issue.

Mr. PERLMUTTER. All right. If there was a thrift in this deal, would you be talking to the OTS at the same time?

Mr. DILWEG. Through a process like this, we would be coordinating with our Federal regulators. We have coordinated with FSA in London on issues. We coordinate with our Australian regulators.

Mr. PERLMUTTER. Do you, in this process, ever come up with a situation similar to the AIG situation Mr. Royce was just asking about, where they got some part of a business? Let's say, they own hotels or they own casinos, or they do credit default swaps. Do you, in that process, as the lead State say, whoa, there's some stuff here that we don't understand or we can't reach those products.

Mr. DILWEG. I think one important point going back to Congressman Royce's question is, should we have seen it coming sooner? Should we have done something on securities lending? You are stuck looking at securities that are rated triple A. Now, once they all collapsed, all the various regulators were coordinating basically through New York, Pennsylvania, and Texas on the AIG side from the insurance side.

Mr. PERLMUTTER. And I'm not looking for blame on that one.

Mr. DILWEG. Right.

Mr. PERLMUTTER. My question is more if the insurance company is also involved in other areas of commerce that aren't really insurance types. One of the things we're dealing with in this big regulatory bill is do we go back to a Glass-Steagall kind of an approach where we separate insurance companies from the stockbrokers, from the commercial banks, from whatever. Financial companies stay financial and we don't try to bring them all together. Do you worry in this process when you see insurance companies delving into other parts of commerce?

Mr. DILWEG. We reach out directly through confidentiality agreements with the OTS, with the Federal Reserve, with Treasury, for FHFA, with all of our Federal counterparts if something like this were occurring to walk through all the issues we see.

Mr. PERLMUTTER. Do you flag it for your partners or your other States, or for any of the Fed or the OTS if it's unregulated? Let's say it's a hotel. They own a hotel. It has nothing to do with financial services or insurance. What do you do?

Ms. FROHMAN. Let me try to answer that. What we do in terms of insurance regulation that I think works fairly well, and we saw that in this instance, is that while off the insurance enterprise, such that there are capital needs for the hotel on the other side of the balance sheet, we are not interested in hotels going down, or whatever. We are not interested in throwing good capital after bad, per se. But we analyze to make sure that the capital within the insurance company is sufficient to pay policyholder claims and remain solvent.

So from that perspective, we don't necessarily look at the enterprises that are not regulated, but in the lessons learned what we hope to accomplish is a more optical approach where we can have

in addition to what we are already doing that we think works really well on the insurance side is to have a better view, more optics upstream so that we can maybe look for trends in contagion and that sort of thing. And those are activities that are going on right now at the NAIC.

Mr. PERLMUTTER. Okay. Thank you. Thank you, Mr. Chairman.

Chairman KANJORSKI. I will now recognize Mr. Garrett from New Jersey.

Mr. GARRETT. Again, I thank the panel for your testimony, so up-to-date.

Mr. Greenlee, in your testimony you mentioned that the Fed must rely on the examination reports of the State insurance authorities to the fullest extent possible. Can you describe any situations in which the Fed was concerned about the information reviewed in any of the examinations? And are you aware of any cases in which the Fed determined that the information was perhaps not sufficient or inadequate for the purposes of carrying out its financial holding company supervisory responsibilities?

Mr. GREENLEE. Thank you for your question.

Mr. GARRETT. Sure.

Mr. GREENLEE. What we follow is what is outlined in the Gramm-Leach-Bliley Act.

Mr. GARRETT. I'm sorry?

Mr. GREENLEE. We follow what's outlined in the Gramm-Leach-Bliley Act, which compels us to rely to the fullest extent possible on primary bank regulators or functional regulators. We will get information at times that will cause us to go back and ask more questions. If there are concerns, we can always go to the audit function of the bank and find out what they think.

We always have the right to go ahead and do our own review and look into it under the law. The burden is on us to say why we think this is a threat to the depository; and, at times we will do that if we are sufficiently concerned.

Mr. GARRETT. Okay. You get the information, you review it, if it's adequate, fine. If it's not adequate, you proceed to go back and seek all the information that you need. So you have not experienced a situation where there's just a dearth or a lack of information that you can't get at the end of the day, because you have that ability to go back.

Mr. GREENLEE. That's correct. And we don't just rely on what we get from the functional regulators. As the consolidated supervisor, we would have a view of all the company's major lines of businesses and its risk management practices. We are aware of broader things going on in the marketplace. We pull all that together to make the assessments of the risk in the organization.

Mr. GARRETT. Okay. You also mentioned in your testimony that the Federal Reserve supervisory approach also recognizes the additional risk arising from the underwriting of life insurance policies and property and casualty insurance policies. I guess, in a nutshell, since time is limited here, can you explain for us some of what you mean by that?

Mr. GREENLEE. Our traditional approach and our capital rules are really aimed at asset quality, credit quality, liquidity risk, market risk, those operational risks.

Mr. GARRETT. Right.

Mr. GREENLEE. When companies affiliate themselves with an insurance underwriter, there are different kinds of risks that aren't captured under those definitions, such as actuarial risks or risks from property and casualty businesses. And what we do with that is we work with the NAIC on producing a paper that explored those differences so that our supervisors can understand that and factor that into our overall assessment of capital adequacy at a holding company.

Mr. GARRETT. Okay. That's on the supervisory side. I think my last question as far as time goes, you make the assertion with the issue that's always dear to me in dealing with the systemic risk issues, and you assert that the risk of the financial system is not just from the banking sector. It's from the insurance sector as well.

We are all familiar with the AIG situation and how that plays out. Can you explain, though, specifically within the insurance sector, where the systemic risk problems are that you're specifically concerned about?

Mr. GREENLEE. Well, I think it's—

Mr. GARRETT. Outside of the AIG type of—

Mr. GREENLEE. Sure.

Mr. GARRETT. Yes.

Mr. GREENLEE. It is a concern more broadly about any firm that is large, complex, and has a lot of interconnections with other players in the financial system and in the marketplace. So an insurance company may have securities activities or engage in—not like AIG—derivative activity that would have some connections with other financial firms and could be a source of contagion to the rest of the finance system if there was a problem there.

Mr. GARRETT. So it's interconnected to this issue that we heard about a year ago, that is the underlying problem as opposed to their own?

Mr. GREENLEE. I would say it's both. The one thing that makes people systemically important, like AIG, is you have a lot of connections to other financial firms so that if that firm goes bankrupt or can't meet its obligations, it has a cascading effect across other financial organizations. So we would worry about the individual firm.

Of course that's how we traditionally supervise. But we are also trying to focus a lot more on these interconnections.

Mr. GARRETT. Okay. And I guess he's not watching. But that aspect is as far as the carrier themselves, the insurance company themselves, are what the folks to my right, your left—well, the two folks on the end—is where your responsibilities lie. And some would argue have been doing an adequate job in those areas. Correct?

Mr. DILWEG. I would agree with that statement, Congressman.

Mr. GARRETT. Okay. Do you have anything to add, Mr. Dilweg?

Mr. DILWEG. I think it is important we do correspond typically with the New York Fed on some of the issues you're describing. We have a good back-and-forth on any issues surrounding various insurance companies, so they get informed on what they need to know.

Mr. GARRETT. And so what I take from this, and I heard some of the testimony from the rest of you earlier on, is this all sort of supports my opening statement, which is good at the end of the day, right, is that it's not a gap situation here and I appreciate your testimony on this. There's not a gap in the structure of what we have here. It sounds like you all are talking to each other doing the oversight in that responsibility; obviously, we have some concerns.

I don't know where you were specifically at the time, but folks who had the responsibility at that time at OTS in this areas, so it sounds like the overall structure is there. So it's not a gap issue. And it sounds as though that since the problems weren't on the insurance side, per se, it's really something that we need to come back with and we need to do this in a whole bunch of other areas. We haven't had any hearings on the SEC, and I know that's not your bailiwick. But we have to go back on a whole bunch of these other areas just to make sure that the actual execution or implementation of what's already out there, whether it's the SEC or whether it's you folks at the Fed. Or whether it's you folks on the State level, or, just actually implementing it in each case to the highest degree possible to try to avoid what we have in this past situation. Does that sound right?

Mr. GREENLEE. I would just add one other comment from the Federal Reserve's perspective where we do consolidated supervision. We have a couple of things that are very important to us as the consolidated supervisor, and one of them is setting and establishing consolidated capital requirements for the firm as a whole. We think that's an important thing to make sure that the consolidated organization and all its subsidiaries are adequately capitalized and have a sound financial footing.

Mr. GARRETT. My last question—thank you for your forbearance—do you folks have a question or comment on that?

Mr. DILWEG. I guess my only concern on that approach is I would hate to see the policyholder dollars in one of the companies under the umbrella being used to bail out a financial services piece of that.

Mr. GARRETT. That's a good point. How do you avoid that?

Mr. GREENLEE. Well, from our perspective, we have a couple of ways we do that and one is we have laws that restrict intercompany transactions with depository affiliates.

Mr. GARRETT. Okay.

Mr. GREENLEE. The second thing is under our supervision of the holding company, which is the parent organization, we do expect them to maintain adequate capital and we also expect all their subsidiaries in the State, Federal, whomever their regulator may be, will meet their capital requirements and satisfy their regulator's needs in terms of capital adequacy. And then we also look at it through how it builds up and the consolidated capital needed for the risk that may not be captured by all those regimes or capital you may need to hold for intercompany exposure or exposures that cut across an organization that may get different treatment.

Mr. GARRETT. Okay. I thank the Chair. Thanks to the witnesses.

Chairman KANJORSKI. Thank you very much, Mr. Garrett.

If it is all right with everybody here, there are only three of us left here, but I would like to ask some additional questions.

Mr. GARRETT. I'm going to object.

Chairman KANJORSKI. You are going to object?

Mr. GARRETT. Well, no. Okay.

Chairman KANJORSKI. Does anybody know how many holding companies there are that own insurance subsidiaries in the country?

Ms. FROHMAN. We don't track the information that way given the way we wall-off insurance companies, but in light of all the data that we do have, it's something that we could probably pull together fairly easily and get you that information.

Chairman KANJORSKI. But we do not know what kind of a problem this is, whether it is a minimal problem or whether it is really a great problem. Nobody really knows here. Now, if we had a Federal regulator, we would know that answer immediately. Correct? Every holding company that has anything to do with insurance would be identified, and categorized, and readily available. Is that correct?

Mr. DILWEG. Well, what I think is important is we talk about holding companies, Congressman. You know, there could be an insurance holding company and then above that a more umbrella-like holding company.

Chairman KANJORSKI. I understand. I am talking now about a holding company on top that is not an insurance company itself.

Mr. DILWEG. Okay.

Chairman KANJORSKI. Just as a holding company, and they own an insurance company, either an overwhelming majority of the stock or all of the stock, and then they own some hotels out here. The question I have in mind is, what do they pay in premiums for their hotels to their insurance company that they own, and who checks on that rate, whether it is an acceptable rate to cover the estimated risk? Do you all rush in there and do that?

Ms. FROHMAN. It depends on whether it's a material issue.

Chairman KANJORSKI. But it is not a material issue. It is that the insurance executives are over here that are part of the holding company. They build a hundred hotels, and they insure them with ABC insurance company. Who looks into the relationship of what the rate is and whether the rate set by the insurance company for the hotels that they own is the same that the regular market pays?

Ms. FROHMAN. That would be the insurance departments. Yes, we would look at regardless of who owns the hotels, the marketplace.

Chairman KANJORSKI. So you check out every insurance policy to see that it is properly rated and charged, or do you only check out insurance companies where you get a complaint that there is an overcharge?

Mr. DILWEG. The rates have to be actuarially sound. They have to fit—have the capital there to pay potential claims.

Chairman KANJORSKI. No. No, I understand that. I am talking about the premium that is going to have to be paid on the hotel. Who is going to decide if they go to their own insurance company that is owned by a large holding company which has a hundred hotels that are worth a million dollars apiece, and they go to their

own ABC insurance company, and they say, "Well, we would like to insure all our hotels, but we only want to pay a rate of half of that on $50 million." Who does the checking about that?

Mr. DILWEG. That instance you lay out would probably come up more through a complaint process.

Chairman KANJORSKI. So if nobody complained?

Mr. DILWEG. Well, a competitor would probably complain.

Chairman KANJORSKI. How would a competitor know?

Ms. FROHMAN. We also engage in risk focus exams, and so in the examination process, we look at affiliate transactions and that very sort of thing.

Chairman KANJORSKI. But you do not have any authority to go up to that top holding company to find out what those transactions are, do you?

Ms. FROHMAN. We don't have the authority to go to the holding company, but we can do it from the insurance company.

Mr. DILWEG. So in a different scenario, Congressman, where you're simply paying for IT or services, administrative services. You can't have the holding company overcharging the insurance company just to make money as far as business operations, underwriting, things like that.

Chairman KANJORSKI. I am not talking about overcharging. I am talking about undercharging. It is certainly advantageous for a holding company that owns subsidiaries that are in different businesses, one being an insurance company, and others being office buildings, hotels, or anything else, to make it known that we want to do business within our own family, and, two, we want you to get favored rates because we make a profit on it.

Ms. FROHMAN. We did have that scenario happen in our State about 15 years ago with a business that wasn't satisfied with the premium and decided it would attempt to acquire the insurance company to lower its rate. We issued a cease and desist on that, and ultimately through the State court process as well as the circuit court, said "No," and they divested themselves. So we do stay on top of those and I do think through our risk-focused exam and the types of inquiries that we make, we reach out and look for those sorts of issues.

Chairman KANJORSKI. How many holding companies are there in the State of Nebraska?

Ms. FROHMAN. We have about 76 or 77 significant insurance companies and those all would have holding companies, I believe.

Chairman KANJORSKI. Okay. Those are insurance holding companies. How about holding companies that own insurance companies as subsidiaries?

Ms. FROHMAN. Probably most of them.

Chairman KANJORSKI. They are both holding companies as an insurance company and holding companies that own subsidiaries that are insurance companies?

Ms. FROHMAN. Both.

Chairman KANJORSKI. Both. Do you have an exact number on that?

Ms. FROHMAN. Again, I don't. The way we regulate doesn't make it quite as relevant.

Chairman KANJORSKI. Recognizing you have a lot of work to do, even within just the single State of Nebraska to get all this done, how can you also police this interrelationship that occurs between companies that are familiarly related?

Ms. FROHMAN. We have folks on staff, and that is all they do. And they require through our Holding Company Act, there's a process for filing these agreements, these cost-sharing agreements, service agreements. And so any time there's an interaffiliate transaction of a material significance, they're going to come in. We're going to analyze that to determine whether that's fair and reasonable to the insurance company.

Chairman KANJORSKI. How do you, if I am the holding company, not an insurance holding company but just a holding company incorporated in the State of Delaware, and I have an insurance company in Nebraska, how do you come over and examine? What authority do you have under the law as it presently exists to come over to Delaware to examine my corporate records or whatever you want to examine?

Ms. FROHMAN. We do have that authority and can exercise that authority, in particular as it relates to the insurance enterprise.

Chairman KANJORSKI. But the insurance enterprise is in Nebraska. You can go to Nebraska and examine the insurance company, but how can you come and examine the holding company on top that is located in Delaware?

Ms. FROHMAN. We don't examine the holding company, per se, but we look at the books and records as they relate to the insurance company anywhere in the country or outside.

Chairman KANJORSKI. How would you know whether that holding company in Delaware owned hotels in Florida?

Ms. FROHMAN. We do require as part of our holding company system now a registration statement on an annual basis that requires disclosure of the holding company structure.

Chairman KANJORSKI. But the holding company is not in Nebraska, so the holding company is not subject to Nebraska law. It is subject to Delaware law.

Ms. FROHMAN. It's through an indirect approach. We require that the insurance enterprise file all the information of their holding company system with us.

Chairman KANJORSKI. Okay, and if they own 54 percent of the stock? And the insurance company owns 54 percent of the stock in the insurance company in Nebraska, what happens if they own 40 percent?

Ms. FROHMAN. We have a definition of control that triggers the holding company system review.

Chairman KANJORSKI. What is your method?

Ms. FROHMAN. And that's at 10 percent at a presumption?

Chairman KANJORSKI. Anything over 10 percent is presumed to be controlled by the local corporation?

Ms. FROHMAN. Yes, it is.

Chairman KANJORSKI. What did I do? Did I go over my time? Do I have to recognize the gentleman from California? He is not running yet. Oh, there he is, Mr. Royce.

Mr. ROYCE. Thank you, Mr. Chairman. I have a question for Mr. Dilweg. Something you said really got my attention. When you

said, well, on these triple-A rated securities, the credit rating agency has given us this assessment. And I just wondered, do you always just outsource to the credit rating agencies these questions?

That clearly was a mistake in my view, and another aspect of that, the bond rating agencies or the bond insurance industry. Let me ask you this. Would you like to comment on the failure of the bond insurance industry, especially given that so much of that was in Wisconsin? And what has changed on each of these fronts?

You have State regulation on both fronts, bond insurance as well, and we had a failure here to uncover this. Give me your observation on what has changed.

Mr. DILWEG. Let me address both points, Congressman. I think, when I came into this position, we had inherited a heavy reliance on rating agencies, as I think the Federal Government did as well. We have spent the last 3 years trying to look at dialing back our reliance on rating agencies.

Just recently, we did our own due diligence, brought in a vendor, PIMCO, to look at how we rate and value residential mortgage-backed securities. So this is an ongoing process. But, at that snapshot in time, we were built to see that triple A was triple A. And so that was the nature of that comment. I think on the bond insurance, that's unique to Wisconsin. When I look back—and I still have people on staff—where you had a piano company, Baldwin United, go bankrupt in the early 1980's, what spun-off from Baldwin United was AMBAC, a bond insurer that they owned, MGIC, a very large mortgage insurer that they owned.

And that is one reason that Wisconsin is heavily involved in these issues, but that was a role of how companies owned insurance companies back then that failed. We look very closely and have with AMBAC, at the capital that they have, and we are working very closely with the company and our independent advisors on their position and how they struggle with stresses of this economy.

Mr. ROYCE. Let me ask you lastly, Mr. Greenlee, a question. If price controls were putting the solvency of a given insurance subsidiary at risk, would the Fed or the OTS have the authority to intervene and remove the price-fixing requirement on that subsidiary?

Mr. GREENLEE. I think, under the current statute, we need to defer to the primary functional regulator, which would be the State insurance regulator. If they were to set that in place, we would probably not take action on that.

Mr. ROYCE. What about if the holding company was funneling money into a subsidiary that was not able to charge actuarially sound rates? Could you prevent that transfer if it was weakening the broader company?

Mr. GREENLEE. Yes, we could.

Mr. ROYCE. I see. Thank you.

Mr. Chairman, I am going to yield back.

Chairman KANJORSKI. The gentlelady from Illinois, Ms. Biggert.

Mrs. BIGGERT. Thank you, Mr. Chairman. My first question is for Mr. Dilweg.

You mentioned that any State in which a company is licensed to conduct an insurance business may conduct its own regulatory oversight, and that's not just the company's State of domicile. So

do the States communicate with each other whenever they're engaged in such oversight, and what systems are in place to ensure against replication and duplication or inefficiency in such cases?

Mr. DILWEG. The typical thing that I have seen, Congresswoman, as it relates to, you know, as you're wrestling with asset valuation, what they're filing with each State, a different State may view assets differently, we try and reconcile that at a national level. You do not typically see. We are all accredited, all 51 jurisdictions, so there is a lot of communication if something like this were to occur. It would be unusual for an individual State to do it without talking to the domestic regulator, and, really, try not to duplicate on the financial side of the ledger.

Mrs. BIGGERT. But it really depends on the communication to make sure that they do communicate?

Mr. DILWEG. Correct. And we feel through the NAIC we have really laid the groundwork, especially on the financial side for these communications to be facilitated.

Mrs. BIGGERT. Okay. Thank you. And then, Ms. Frohman, you cite in your testimony that the sharing and collection of information between the regulators is important to protect the policyholders. What type of time requirements should be put in place for this information sharing and who should make that determination? And should a Federal entity preempt an State insurance regulator when it comes to collecting insurance information?

Ms. FROHMAN. Thank you. With respect to the first question, I don't think it's necessary that we put time requirements on it, because the information that we're sharing under the authority of our MOUs happens in real time, and it's a very fact and circumstances-based for the most part in addition to our routine; you know, 50,000 feet communications that we engage on a regular basis.

With respect to your second question, which was?

Mrs. BIGGERT. Should a Federal entity preempt an insurance regulator when it comes to collecting insurance information?

Ms. FROHMAN. I don't think it's necessary, given that we have all the information, as Commissioner Dilweg mentioned. We are data-intensive, and we can communicate and coordinate and provide that information. So I don't see the necessity for preemption, because I do think you want to have the expert that understands it explaining it.

Mrs. BIGGERT. Okay. Thank you. Then does NAIC monoline provide authority for State insurance regulators to examine the financial information of holding companies affiliates to understand if they would have a negative impact on the insurance company?

Ms. FROHMAN. We do have some authority now to go upstream, and as it relates to the insurance company. But an exercise we are taking on through the group solvency issues working group at the NAIC is to enhance that ability. So it's something that's under way we think we can always improve, and we're looking to come up with some tools to do that.

Mrs. BIGGERT. Okay. And my last question is, are the State banking regulators currently represented on that council and would that be helpful, if State insurance regulators had an explicit role on a Federal body to better coordinate with the Federal regulators?

Mr. DILWEG. I think any body that you bring together to coordinate on the Federal side, we would be interested in participating in. I think you also have to recognize some of our insurance commissioners are also banking regulators. We have duplication as it relates to Vermont, the District, here. So you're going to have some overlap just by the nature of how some of the States structure their banking and insurance departments.

Mrs. BIGGERT. Good. Thank you very much. I yield back.

Chairman KANJORSKI. If you do not mind, I am going to go with another set of questions.

Mr. GARRETT. Well, I just have two quick things.

Chairman KANJORSKI. Two quick things?

Mr. GARRETT. Yes.

Chairman KANJORSKI. I yield to you.

Mr. GARRETT. One, I seek unanimous consent to enter into the record the testimony of the Property Casualty Insurance Association and their March 18, 2010, comments.

Chairman KANJORSKI. Without objection, it is so ordered.

Mr. GARRETT. And, secondly, Ms. Frohman, you had stated something with regard to your participating in a supervisor college exercise dealing with domestic and foreign regulators. The chairman and I were over in Europe in August or September and that was one of the broader issues as far as harmonization and what's going on over there and what's going on over here. Can you spend just a minute or 30 seconds, whatever, to what extent issues you'll be dealing with there and what extent you'll be interacting with foreign regulators?

Ms. FROHMAN. Yes. Thank you for asking. We convened the supervisory college about a year ago in conjunction with our counterparts at the FSA in the Balkans and Germany, as well as the Australian regulatory authority, began conversations on the Berkshire Hathaway Group. And we have had probably four to five phone calls, and getting started we kind of started at a high level. And as we're forging through, I think what we're finding is we're learning about each other's regulatory systems. We're learning about the details of that company's operations, as well, but, we're finding at the end of the day we do have a lot of common focuses that in essence, I guess I didn't know what to expect and had not formed an impression in the beginning. But our questions on enterprise risk management corporate governance are going to be the things that will focus on, and looking at, is there financial contagion? Is there reputation risk that is something that can be measured and watched with respect to this group? So it's a new exercise for us, but we are spending time with our regulators and do find now that once we forged these relationships that we're benefiting from them in other dimensions. So the dialogue has begun and it is definitely enhancing our tools.

Mr. GARRETT. Okay. Again, thank you to the panel.

Chairman KANJORSKI. Thank you very much. For the State regulators, if I may. Do you feel that all forms of insurance should be regulated on a State level or are there exceptional insurance products that should be elevated to Federal regulatory authority? That is a loaded question, because I want you to give me a particular answer, but you all pick your answers.

Mr. DILWEG. I guess I would turn to a middle ground, Congressman, being vice chair of our compact that relates to life insurance products. I have found that has worked very well as it relates with the 36 States that are now a part of that, and as you know the compacting process is a State-based process. So my concern on raising insurance to a Federal level is frankly a lax concern of not having enough strength there, enough capital there, enough requirements there to protect the policyholder, so.

Ms. FROHMAN. I would agree with that and simply add that to the extent we are talking about insurance products, where at the end of the day your question is geared towards a promise today to pay into the future, I think that consistently belongs with the States and that we can engage. And it does take a dialogue. It does take a global analysis.

Chairman KANJORSKI. Should we repeal Federal depository insurance?

Ms. FROHMAN. I'm sorry?

Chairman KANJORSKI. Should we repeal Federal depository insurance, FDIC? Insurance that Federal banks or the banks of the United States are required to have. Ms. Gardineer's thrifts are required to take Federal insurance out and it is regulated by the regulators, Federal insurance. Do you think we should repeal that and open it up to insurance companies that are regulated by the States?

Ms. FROHMAN. That isn't something I have given any thought to; it is an interesting concept.

Chairman KANJORSKI. Give us some real thought, if you can, now. Do you know that there are deposits of private individuals in the United States in depository entities that are insured by private insurance companies and only regulated by State insurers, would that surprise you?

Mr. DILWEG. I think the concern there, Congressman, would be the banking regulation sits at the Federal level and it would be difficult to move such a policy back down to the State level where the States would really—

Chairman KANJORSKI. These are State-chartered institutions, and by the existence in the famous loopholes we were talking about, they can go out and get private insurance to insure their deposits; in fact, they do so. Do you think that State insurance commissioners are sufficiently competent to regulate that type of insurance product?

Mr. DILWEG. I guess it's something that I haven't spent much time on.

Chairman KANJORSKI. But if I want to go to Wisconsin and open up a depository insurance organization, you do not feel that there should be any inhibition to my coming to your office and submitting the application?

Mr. DILWEG. We take all applications.

Chairman KANJORSKI. What should we do with something like that? Because we are going to have to face it. We have depository institutions in this country that are not regulated by federally established institutions, and you do not run into any problem with them until a recession or a depression occurs when they begin to fail. Then, the question is, who backs them up? Then, you discover

nobody backs them up, particularly States that are almost bankrupt themselves will not come in and back them up. So the Congress gets faced with the proposition: do we just allow all these institutions to fail, and all their depositors, who for all their lives have been told if you deposit money in a depository institution you have the United States Government behind you, and they find out they do not. What do we do?

We have that actual question facing us right now; not that they are insolvent. Do you see what the problem is? If somebody found out how to make money by offering insurance in good times on deposits—the argument has been made now—particularly in good times before the recession started, that we should look at repealing requirements at the Federal Deposit Insurance.

If the private sector can do it much cheaper and much better, the only problem is they do not have to forfeit credit with the United States Government standing by. Do you think we should encourage that type of insurance to be regulated at a State level? That is my question.

Ms. FROHMAN. I simply don't have an answer for you. I'm sorry. I wish I could help, but I have not given it enough thought.

Chairman KANJORSKI. And you are going to duck out of it too, right?

Mr. DILWEG. It's not something I have thought about, Congressman. It's unique because I think that's one issue that I found—you're talking about insuring entities where there could be a run on the bank—and when we face the AIG issue, you had long-term contracts that were in place. And it's a different type of nature of insurance, so those entities where there's a run on a bank, I think it's a very pertinent question and I would be happy to spend more time.

Chairman KANJORSKI. If you do not mind, I would really like your thoughts after you have some time to think about it.

Mr. DILWEG. That would be great.

Chairman KANJORSKI. We ought to be consistent, logically consistent on this.

If the private sector of insurance is so good and manageable entirely at the State level, then we should reexamine whether we should stay in the Federal Deposit Insurance business or create an alternative organization. We have the authority to say that no depository institutions should be allowed to be in the private sector and be regulated only at the State level. I think we should start choosing the alternatives because our problem is that, as in the S&L crisis, we had to go in and bail out three or four States that allowed that to happen and did not have the resources to pay on their insurance.

As a result, we were faced with a terrible situation. There could be another situation where depositors would be entirely wiped out of their life savings because somebody felt that: one, the State had the authority and the expertise to be the regulator of that type of insurance company; and two, they never thought there would be a recession or a depression, or that they would be at risk. But it happened once before.

My question is, what do we do about it? Nonetheless, thank you very much for your testimony today. Ms. Gardineer, you have been

a good sport. I really jumped on you a little bit there, and I purposely did that because those questions are out there, and we get asked those questions. I thought you did a commendable job in the advocacy for the group, so I am going to award you an "A."

The Federal Reserve, they are used to getting jumped on, so thank you very much. We have to note that some members may have additional questions for this panel which they may wish to submit in writing. Without objection, the record will remain open for 30 days for members to submit written questions to today's participants and to place their responses in the record.

Without objection, it is so ordered. The panel is dismissed and this meeting is adjourned. Thank you.

[Whereupon, at 11:58 a.m., the hearing was adjourned.]

A P P E N D I X

March 18, 2010

OPENING STATEMENT OF CHAIRMAN PAUL E. KANJORSKI

SUBCOMMITTEE ON CAPITAL MARKETS, INSURANCE, AND GOVERNMENT SPONSORED ENTERPRISES

HEARING ON INSURANCE HOLDING COMPANY SUPERVISION

MARCH 18, 2010

Good morning. We meet today to further examine the issue of insurance supervision, especially as it relates to holding companies. The time is ripe for us to delve into this complicated and important subject.

The Federal government's intervention in American International Group has raised many questions about the existing oversight of holding companies with insurance operations. While AIG's insurance companies may not have directly caused the conglomerate's downfall, the actions of the holding company and other subsidiaries within AIG certainly could have led to serious consequences for insurance policyholders if the government had not stepped in.

During our recent debates in the House on the Wall Street reform bill, we also tackled many questions about holding company oversight. While we already know much about the supervision of financial, bank and thrift holding companies, we now need to take the time to learn more about the regulation of insurance holding companies. I believe that today's hearing will help us to identify ways that we can further improve the financial services regulatory reform bill before it becomes law.

The vast majority of insurance holding companies -- some of which are shells and some of which are complex -- are currently regulated at the State level. Additionally, the Federal Reserve System and the Office of Thrift Supervision together oversee no less than 100 entities with insurance operations. Our witnesses will help us to better understand the current lay of the land when it comes to the consolidated supervision of insurance holding companies and bank or thrift holding companies with insurance operations.

The two State commissioners with us today will specifically explain their dual roles as insurance regulators and insurance holding company supervisors. Because the failure of an insurer could affect the health of the insurance holding company and because problems within the holding company or its subsidiaries could affect the insurers within a firm's tangled network, we need to ensure that State supervisors have strong powers to protect policyholders and ensure the solvency of any of the entities that they regulate.

In those instances where a State regulator must oversee an insurer or insurance holding company with operations outside the State, we must also ensure that we have meaningful cooperation and communication between State regulators. Moreover, to protect our economy from systemic risk, we must ensure that there is appropriate consolidated supervision of complex insurance firms.

When depository institutions and insurers operate under the umbrella of the same holding company, both State and Federal regulators have important supervisory roles. In such instances, State commissioners maintain their role as functional regulators of any insurers within these complex entities. Federal regulators have the responsibility for oversight of any depository institutions and the holding company.

The Federal regulatory representatives with us today will help us to better appreciate the formal rules of the road as laid out in statute and regulations about where a Federal regulator's authority begins and a State regulator's power ends in these corporate amalgamations. Their testimony may also help us to discern whether or not we have regulatory overlaps or gaps and what steps regulators have taken to address such situations.

Each of our witnesses will undoubtedly emphasize the differences between insurers and depository institutions. These distinctions are important, but they fail to address the purpose of today's hearing. The recent financial crisis has taught us that any complex financial company must have an effective umbrella supervisor who looks comprehensively at the activities and health of the whole enterprise. This includes any holding company with insurance activities.

We must further explore whether or not the Federal banking regulators are overseeing too few or too many holding companies with insurance operations and whether or not they are appropriately focused on consolidated oversight issues. We should also ask whether or not consolidated supervision is diversified among too many regulators, such that it has become ineffective or an afterthought.

In sum, these are difficult policy issues, and the answers we receive will undoubtedly lead to new questions. We fortunately have already identified a way to examine these matters after we finish this hearing: One important provision of the House-passed Wall Street reform bill, the Administration's plan, and Senator Dodd's proposals is the creation of a Federal office to review insurance matters on a national scope. The Federal Insurance Office, for which I have advocated for a number of years, should look at these very questions to advise Congress on these important policy matters in the future.

Testimony of the
National Association of Insurance Commissioners

Before the
Subcommittee on Capital Markets, Insurance, and
Government-Sponsored Enterprises
Committee on Financial Services
United States House of Representatives

Regarding:
"Supervision of Group Holding Companies"

Thursday, March 18, 2010

Sean Dilweg
Commissioner, State of Wisconsin
Office of the Commissioner of Insurance
On Behalf of the National Association of Insurance Commissioners

Testimony of Sean Dilweg
Commissioner, State of Wisconsin
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On Behalf of the National Association of Insurance Commissioners

Chairman Kanjorski, Ranking Member Garrett, and Members of the Subcommittee, thank you for the opportunity to testify this morning. My name is Sean Dilweg, and I am Commissioner of Insurance for the State of Wisconsin. I am also a member of the National Association of Insurance Commissioners, and I am joining my colleague from Nebraska, Director Ann Frohman, in testifying today on the NAIC's behalf.

The purpose of my testimony is to provide insight on how state insurance regulators assess the financial strength of an insurer, and to describe our unique regulatory working groups that assist and improve this assessment; in particular, the NAIC Financial Analysis Working Group (FAWG). As Director Frohman discussed in the context of our approach to group supervision, financial regulation is a critical component that ensures our most important consumer protection: *solvency*. That basic concept guarantees that damaged automobiles are repaired, that annuity payments arrive in the mail on-time, and that families hit by natural disasters can rebuild and recover. Through the NAIC, regulators have created three core solvency surveillance mechanisms – reporting, analysis, and examination – to ensure that these obligations to policyholders, claimants, contract holders, and other parties are met both today and in the future. In our unique system of state regulation, it is imperative that regulators around the country have access to these sophisticated tools, particularly when assessing large, multi-state insurers.

In order to ensure a strong and consistent level of solvency supervision around the country, NAIC members have developed an accreditation system, called the Financial Standards and Accreditation Program ("Accreditation Program"). The NAIC Accreditation Program is the cornerstone of our prudential supervision of insurers, and has set a baseline standard for effective solvency regulatory systems, while also allowing for inter-state cooperation and reducing regulatory redundancies. Among other things, this program assures that accredited states have

sufficient authority to regulate the solvency of the multi-state domestic industry. All 50 states are currently accredited.

To be accredited, a state is required to conduct quarterly financial analyses on their domiciliary multi-state insurers. Most states conduct such oversight on their single-state insurers as well. Typically, insurers with anomalous results, or those that have been previously identified for attention, are subject to additional analysis.

An insurer's domiciliary state is relied upon as the primary solvency regulator for the states in which the domestic insurer is licensed to transact business. When there are concerns about the financial condition of an insurer, or when significant transactions take place, communications between the domiciliary state and the other states in which the company is licensed are increased. However, any state in which a company is licensed to conduct insurance business may perform its own monitoring, including financial analysis and examinations, and take regulatory action as appropriate.

I am here today to speak with you about three NAIC working groups that assist states with the three core solvency surveillance mechanisms – the Financial Analysis Research and Development Working Group, the Financial Analysis Handbook Working Group, and the Financial Analysis Working Group. The products generated by the first two groups provide tools and resources that supplement individual state regulatory efforts. The system of checks and balances established by the third group, the Financial Analysis Working Group, offers a layer of peer review for each regulator's solvency monitoring efforts, thus ensuring that judgments regarding a company's financial health are improved or enhanced by experienced state regulator colleagues. All three working groups are funded directly by the NAIC's operating budget each year.

The combined effort of these three working groups serves as a foundation of valuable financial solvency support and analysis that the NAIC provides to state insurance regulators. Due to the strong regulatory heritage in Wisconsin and its strong confidentiality laws, all three of these working groups are chaired out of my home state of Wisconsin.

The Financial Analysis Research and Development Working Group

The NAIC Financial Analysis Research and Development Working Group is responsible for our Financial Analysis Solvency Tools (FAST), a collection of analytical solvency tools and databases designed to provide state insurance departments with an integrated approach to reviewing the financial condition of insurers operating in their respective states. FAST is intended to assist regulators in prioritizing resources to those insurers in greatest need of regulatory attention.

The following are three key tools within the FAST System:

1. **Insurance Regulatory Information System (IRIS)**: IRIS has served as a baseline solvency screening system for the NAIC and state regulators since the mid-1970s. Its first, "statistical phase" involves calculating a series of confidential financial ratios for each insurer based on statutory annual statement data. Because the ratios by themselves are not indicative of adverse financial conditions, an experienced team of state insurance examiners and analysts then reviews the IRIS ratio results and various other financial information through the second "analytical phase."

   In this second phase, the Analyst Team meets to identify insurers that appear to require immediate regulatory attention, through the review of a computer-selected priority listing of insurers that may be experiencing weak or declining financial results. The team then validates the listing based on further analysis of those companies, and provides a brief synopsis of its findings in a document that can be accessed only by state insurance regulators and authorized NAIC staff.

2. **Scoring System**: The NAIC Scoring System is based on several financial ratios and is similar in concept to IRIS ratios, but provides results for both an annual and a quarterly basis. The Scoring System also includes a broader range of financial ratios, and assigns a score to each ratio based on the level of solvency concern each result generates. As with the IRIS results, the Scoring System results and scores are available only to state insurance regulators and authorized NAIC staff.

3. **Insurer Profiles System**: Finally, the Insurer Profiles System produces quarterly and annual profiles on property and casualty, life, health and fraternal insurers. These profiles provide either a quarterly or an annual five-year summary of a company's financial position. The Insurer Profile reports provide not only a snapshot of the company's statutory financial statement, but also include analytical tools such as financial ratios and industry aggregate information that can be used in an analyst's review of the company. Insurer Profile reports can assist state insurance department analysts in identifying unusual fluctuations, trends or changes in the mix of an insurer's assets, liabilities, capital and surplus, and operations.

The Financial Analysis Handbook Working Group

The *Financial Analysis Handbook* was developed by the Financial Analysis Handbook Working Group of the Examination Oversight Task Force in 1997. It is available in separate Life/Health, Property/Casualty and Health editions. The *Handbook* is a dynamic document; the Financial Analysis Handbook Working Group meets regularly to review the *Handbook* contents and to revise its guidance as necessary.

Most states use the *Handbook* in completing or supplementing their routine solvency analysis; the guide uses a stair-step approach that directs analysts to perform more in-depth analysis commensurate with the financial strength, prospective risks and complexity of each insurer. The *Handbook* requires regulators to use many analytical tools, databases and processes in completing their quarterly analysis of insurers (such as ratio analysis and review of the actuarial opinion, audited statutory financial statements, holding company filings, and the management discussions and analysis filings).

The *Handbook* provides a means for insurance departments to more accurately identify companies experiencing financial problems or posing the greatest potential for developing such problems. Furthermore, the *Handbook* provides guidance for insurance departments to define and evaluate particular areas of concern in troubled companies.

The overall goal of the *Handbook* is to better enable regulators to identify potential adverse financial indicators earlier, evaluate and understand such problems more effectively, and develop

appropriate corrective action plans sooner, thus potentially decreasing the frequency and severity of insurance company insolvencies.

The Financial Analysis Working Group (FAWG)

For over a decade, state insurance financial regulators have shared information and ideas through the NAIC Financial Analysis Working Group (FAWG), which exists to identify, discuss, and monitor potentially troubled insurers and insurance groups that are typically of national significance (a classification that can change as needed, but considers the size of the company or group's premium volume combined with the number of states in which it writes business – this includes insurers that write the majority of insurance in the U.S.). FAWG leverages the expertise of select chief financial regulators from around the U.S. to provide an additional layer of solvency assessment. FAWG also identifies market trends and emerging financial issues in the insurance sector.

While FAWG does not have specific regulatory authority, no state has ever turned down a recommendation made by this working group. This reality may be because our system of supervision fosters a healthy peer review that results in a pressure to be diligent and vigilant as a domiciliary regulator – as each state where a company is licensed has the authority to act on a FAWG recommendation if the domiciliary state regulator does not.

FAWG's mission is focused around three themes:

1. Identify nationally significant insurers / groups that exhibit characteristics of trending towards financial trouble.

2. Interact with domiciliary regulators and lead states in order to assist and advise on appropriate regulatory strategies, methods, and actions.

3. Encourage, promote and support coordinated, multi-state efforts in addressing solvency issues.

FAWG's review of companies can be described generally, though not exclusively, as:

- Identify companies that are outliers when compared with benchmarks of the industry market segment. However, some companies may be referred to FAWG from other state insurance regulators.

- Develop communication for the financial staff and commissioner for the state of domicile for the insurer/group under review. This includes a description of the issue, questions, and suggestions on regulatory options.

- Review of domestic or lead state regulator responses on issues identified and questions raised.

- Consider whether responses identify a need to follow up with regulators – including a presentation by the domiciled regulator to FAWG and other regulators.

- Consider whether to request the formation of a subgroup of FAWG for certain insurers or groups to facilitate regular communication and collaboration with applicable regulators. However, states generally proactively communicate with the most relevant regulators for each situation on their own.

FAWG's membership is comprised of 16 financial regulators representing the four regional zones of the NAIC (the Midwest, the Northeast, the Southeast, and the Western); current members hail from California, Connecticut, Delaware, Florida, Illinois, Massachusetts, Minnesota, New Jersey, New York, Ohio, Pennsylvania, Texas, and Wisconsin. Since the analysis done by the working group is highly technical and requires significant experience and judgment, members are only accepted into the group after meeting specific experience and skill standards. Members are specifically not the insurance commissioners or lead regulators in the states, but rather experienced senior staff employees – a structure that provides the hands-on experience necessary to best evaluate issues while lessening the potential for any political influence. FAWG members meet during NAIC national meetings and each spring to review the

NAIC's financial analysis of insurers for the year; these forums are open to regulators from all 50 states.

FAWG evolved from reliance upon members' personal knowledge of troubled companies, and led to the creation and development of sophisticated and comprehensive financial tools and benchmarks through data management. The data benchmarks encapsulate various categories, including leverage, asset quality, liquidity, and operations. In fact, the data analysis and methods used by FAWG help develop concepts and questions that are incorporated into the *NAIC Financial Analysis Handbook* each year, as well as into the *NAIC Troubled Insurance Company Handbook* as needed.

Through the FAWG forum, individual states work together to support and guide fellow regulators for the benefit of the whole in an entirely open and confidential process. The working group also reviews and considers trends occurring within the industry, often concentrating on a particular segment of the market, product, exposure, or other problem that has the potential of impacting the solvency of the overall industry. For example, FAWG directed NAIC staff to inform all domiciliary regulators of the investment holdings of their insurers regarding mortgage-backed securities and troubled firms such as Lehman Brothers in a very timely manner for these issues. The group also suggested additional stress testing for variable annuity writers in 2009. In some cases, such discussions lead to more focused work among specific states.

Coordination with Federal Agencies

In terms of coordination with other agencies, state regulators (including members of FAWG) and NAIC staff regularly engage in both formal and informal dialogues with federal regulators at the Office of Thrift Supervision (OTS) and the Federal Reserve (the "Fed"). Just 48 hours ago, in fact, the NAIC participated in a quarterly meeting of the NAIC-Federal Banking and Thrift Regulatory Agencies Insurance Liaisons, which includes representatives from the Federal Reserve and OTS, to review the 2009 financial condition of the insurance sector, among other topics.

Furthermore, pursuant to the Gramm-Leach-Bliley Act (GLBA), each state has a number of Memoranda of Understanding agreements in place for information sharing with federal regulators at the Office of the Comptroller of the Currency, the Office of Thrift Supervision, the Federal Deposit Insurance Corporation, and the Federal Reserve. Following passage of GLBA, the Fed has also organized periodic cross-sector meetings in which a state insurance regulator is typically invited to participate. Several representatives from these federal agencies attend our thrice-annual National Meetings, where the majority of our work is accomplished each year. Additionally, through the NAIC, state regulators have access to an enormous amount of aggregate data and information about the insurance sector, and we routinely provide ad-hoc reports to federal agencies on the financial condition of the industry or a sector.

Conclusion

As a state-based system of regulation, we are keenly aware of our unique structure, and have developed tools such as Accreditation and FAWG to ensure that we are effectively and efficiently maximizing our resources to protect consumers and the solvency of our regulated entities. Clearly, there are a number of coordinated resources for state insurance regulators to assess the financial strength and condition of insurers – both small single-state insurers, and large multi-state groups. Our system is embedded in an accreditation program adopted by all states, and requires peer-review to verify the consistency and integrity of our supervisory approach.

While the recent financial crisis has dramatically illustrated that regulators can and will make mistakes, it is important that we seek a structure that minimizes the impact and opportunity for such mistakes. We believe, and history has shown, that the inherent checks and balances of our multi-state approach to group supervision and financial assessment minimizes the potential of significant problems falling through the cracks. Indeed, we see elements of this embedded in federal reforms, such as the "council" approach to systemic supervision. As the NAIC and its members improve our approach to supervising insurance holding companies and groups, these tools must be incorporated, and if necessary, improved to continue their role. In the context of increasingly large and interconnected financial institutions, this has never been more important.

Thank you for the opportunity to testify, and I look forward to your questions.

Testimony of the
National Association of Insurance Commissioners

Before the
Subcommittee on Capital Markets, Insurance, and Government
Sponsored Enterprises
Committee on Financial Services
United States House of Representatives

Regarding:
"Insurance Holding Company Group Supervision"

Thursday, March 18, 2010

Ann M. Frohman
Director of Insurance, State of Nebraska
On Behalf of the National Association of Insurance Commissioners

Testimony of Ann M. Frohman
Director of Insurance, State of Nebraska
On Behalf of the National Association of Insurance Commissioners

Chairman Kanjorski, Ranking Member Garrett, and Members of the Subcommittee, thank you for inviting me to testify before the Subcommittee.

My name is Ann Frohman. I am the Director of Insurance for the State of Nebraska. I am testifying today on behalf of the National Association of Insurance Commissioners (NAIC). I am pleased to be here to discuss state insurance regulators' activities in the area of group supervision of insurance holding companies.

NAIC Financial Regulation Standards and Accreditation Program

Before delving into the specifics of holding company and group supervision, I must first highlight a program that supports much of this system. State regulators, working through the NAIC, have developed a comprehensive system of baseline prudential standards and practices necessary for supervising the insurance sector. This system, the NAIC Financial Regulation Standards and Accreditation Program ("Accreditation Program"), was developed with regulators, legislators, consumers and industry input to ensure that all states maintain a strong and consistent baseline of financial regulation and regulatory practices. All 50 states are now accredited, and maintaining accreditation requires periodic assessments of compliance that ensure that the laws and rules necessary for accreditation are not just on the books, but followed and enforced.

Failing accreditation can have adverse consequences for a state regulator, as financial examinations performed by a non-accredited state will be rejected by other states. This subjects insurance companies to financial examination by other insurance departments, and thereby threatens the insurance industry in a state, as insurance companies consider relocating to an accredited state to reduce the cost and number of examinations.

As we discuss holding company supervision below, we will reference numerous tools, practices,

and model laws, many of which are necessary for maintaining accreditation.

U.S. Supervisory Monitoring Approaches for Groups

As insurance companies have grown increasingly complex, spanning multiple state jurisdictions and organized with multiple affiliates, state regulators and the NAIC have had to develop tools and processes for ensuring an effective and coordinated approach to group supervision. State insurance regulators monitor insurance groups using three critical mechanisms: Reporting, Financial Analysis and Examination.

Reporting

Regular reporting of certain holding company information is statutorily required and involves a magnitude of data collection activities, including:

- Information concerning the parent company, its subsidiaries and its affiliates;
- Organizational charts and details of affiliated transactions;
- Corporate restructuring and acquisitions/dispositions;
- Whether a foreign person or entity directly or indirectly has control of 10 percent or more of the reporting insurer;
- Whether the insurer is part of a bank holding company regulated by the Federal Reserve Board;
- Whether the insurer is affiliated with one or more banks, thrifts or securities firms, and, if so, the name of the applicable federal financial regulatory services agency regulating the company of affiliation;
- Information on direct premiums written internationally;
- Reinsurance agreements (assumed or ceded) with international insurers affiliates;
- Combined and/or consolidated financial filings; and
- Audited financial statements.

Holding company reporting requests can be *ad hoc* as well, based on need and events.

Other regulators may also require additional reporting, such as what occurs with publicly traded holding companies, and the states typically have access to this information. Nearly 1,800 U.S. insurers who write approximately two-thirds of the domestic industry's

direct premium are affiliated with over 180 publicly traded holding companies that are required to file extensive public disclosures with the Securities and Exchange Commission (SEC).

Financial Analysis (Off-Site Inspection)

Group holding company analysis is a standard part of the insurance regulator's quarterly financial analysis process. It includes analysis of the upstream and downstream holding company entities (both financial and non-financial) as well as of the group structure, affiliated relationships, financial condition and management. It utilizes publicly available information, such as SEC filings or international filings, as well as non-public holding company information specifically requested from the insurer. Since state insurance regulators are charged with protecting the policyholders of insurance entities, the focus of group analysis has been on ownership and other business transactions that involve the insurance entities.

Examination

Risk-focused examination considers holding company risks and their prospective implications on the domestic insurer/group. For multiple insurance entities within the same group, U.S. state insurance regulators encourage the use of group examinations to maximize resources and create efficiencies.

Overall, the U.S. has strong experience with cross-border supervision and coordination activities with troubled companies. In fact, a key strength of the state insurance regulatory system is that multiple jurisdictions provide peer review. For example, in addition to the NAIC's Financial Analysis Working Group (FAWG) activities – a quarterly forum for regulator discussions and collaboration on potentially troubled insurers/groups, which Commissioner Dilweg will discuss in more detail – states conduct quarterly analysis on non-domiciliary insurers/groups. There is also routine coordination with "lead state" regulators of groups.

States also coordinate frequently with other functional regulators, such as the Office of Thrift Supervision (OTS), Federal Reserve Board (FRB), Office of the Comptroller of the Currency

(OCC), Federal Deposit Insurance Corporation (FDIC), U.S. Department of Agriculture (USDA) and Centers for Medicare and Medicaid Services (CMS). An example of this coordination can be witnessed in the NAIC quarterly meetings with federal banking and thrift regulatory agencies.

The Insurance Holding Company System Regulatory Act

U.S. statutory holding company laws in general apply to individual insurance companies, and not to holding companies. Therefore, all states and the District of Columbia have adopted language substantially similar to the NAIC's *Insurance Holding Company System Regulatory Act* (Model #440 or "the Holding Company Act") and its related Regulation (Model #450) regarding change of control for any licensed insurer. The models, which are required in order for a state to comply with the NAIC Accreditation Program, are designed to regulate transactions among insurers and other affiliated entities, mergers and acquisitions, standards for transactions, and holding company information.

The *Holding Company Act* requires annual filings regarding the holding company system and detailing intercompany contract terms and relationships (known as Forms B and C). In addition, virtually all intercompany contracts must be filed with the state insurance department for review. The department must also be informed of major transactions, including material changes to reinsurance contracts, major transactions and investments, management agreements, cost sharing, tax allocation agreements, certain guarantees, intercompany investments and requests for extraordinary dividends. The NAIC Accreditation Program requires adequate and timely analysis of these findings by state insurance departments.

Control

The *Holding Company Act* defines "control" as more than just the presumed control involved with 10 percent or more ownership, in that it includes the ability to influence the insurer, and requires potential controlling owners to receive regulatory approval for changes in control (Form A, discussed in greater detail below). The *Act* specifies minimum financial and non-financial requirements for resources, and requires background information on applicants. Furthermore, the *Holding Company Act* sets out clear criteria under which regulators can deny a change in control:

(a) After a change of control, the domestic insurer would not be able to satisfy the requirements for issuance of a license to write the line or lines of insurance for which it is currently licensed;

(b) The effect of the merger or other acquisition of control would be substantially to lessen competition in insurance in the state or create a monopoly;

(c) The financial condition of any acquiring party is such that it might jeopardize the financial stability of the insurer or prejudice the interests of its policyholders;

(d) The acquiring entity's plans or proposals to liquidate the insurer, sell its assets, consolidate or merge it with any entity, or make any other material change in its business or corporate structure or management would be unfair and unreasonable to policyholders and not in the public interest;

(e) The competence, experience and integrity of the persons who would control the operation of the insurer are such that it would not be in the interest of policyholders and the public to permit the merger or other acquisition of control; or

(f) The acquisition is likely to be hazardous or prejudicial to the insurance-buying public.

NAIC Framework for Insurance Holding Company Analysis

The *NAIC Framework for Insurance Holding Company Analysis* was incorporated into the NAIC's *Financial Analysis Handbook* to assist regulators in analyzing holding companies. The *Handbook* provides for the designation of a lead state to assist states in coordinating analysis and regulatory review of insurance groups; the Gramm-Leach-Bliley Act's timely action requirements underscore the importance of such coordination.

Elements of such analysis include:

Form A – Statement of Acquisition of Control of or Merger with a Domestic Insurer

The *Holding Company Act* outlines specific filing requirements for persons wishing to acquire control of or merge with a domestic insurer. The person wishing to acquire control must file a Statement of Acquisition of Control or Merger with a Domestic Insurer (Form A) with the domestic state of each insurer in the group. The domestic state or lead state then communicates

the filing with all impacted states. Individual state statutes and regulations may impose public hearing requirements and time limitations on the review period, and federal law sets out the time period for review of any transactions with depository institutions. The NAIC's Accreditation Program requires that the filing be reviewed in a timely manner and that the reviewing state insurance department have sufficiently qualified staff, as well as appropriate procedures, to perform the review.

Form B – Insurance Holding Company System Annual Registration Statement

The Insurance Holding Company System Annual Registration Statement (Form B) allows state regulators to identify and evaluate the relationships within holding companies that affect insurers. The *Holding Company Act* requires every insurer that is a member of an insurance holding company system to register by filing a Form B within 15 days after becoming subject to registration, and annually thereafter. Furthermore, a non-domiciliary state may require any insurer that is a member of a holding company system and authorized to do business in the state to furnish a copy of its Form B registration statement, even if the insurer is not subject to registration in its state of domicile.

Form D – Prior Notice of a Transaction

The *Holding Company Act* requires each insurer to give notice of certain material affiliated transactions through Form D, Prior Notice of a Transaction. These transactions are then reviewed by the company's domiciliary state to determine if they are fair and reasonable to the interests of the insurer. The transaction is considered material if, for non-life insurers, it is the lesser of three percent of the insurer's admitted assets or 25 percent of the policyholders' surplus, and for life insurers, three percent of the insurer's admitted assets. Each is considered as of the most recent year prior to December 31. Some states have stricter definitions of materiality in their holding company regulations.

Form E (or Other Required Information) – Pre-Acquisition Notification Form Regarding the Potential Competitive Impact of a Proposed Merger or Acquisition by a Non-Domiciliary Insurer Doing Business in the State or by a Domestic Insurer

The *Holding Company Act* requires that any domestic insurer, together with any person controlling a domestic insurer or proposing a merger or acquisition, file a Form E or other required pre-acquisition notification form. The insurer may also be required to file documents with the Federal Trade Commission under the Hart-Scott-Rodino Act. The period for review and action on proposed affiliations for transactions falling under the Gramm-Leach-Bliley Act (GLBA) is limited to 60 days prior to the effective date of the transaction. Under Section 104(c)(2) of GLBA, states have a 60 day period preceding the effective date of the acquisition, change, or continuation of control to collect information and take action.

Extraordinary Dividend/Distribution

The *Holding Company Act* requires that any domestic insurer planning to pay an extraordinary dividend or make any other such distribution to shareholders receive proper prior regulatory approval. Some states require a 30 day waiting period after the state insurance commissioner receives notice of the declaration, during which period the commissioner may approve or disapprove the payment. Hence, regulators use this tool to monitor capital flows within a holding company system.

The Berkshire Hathaway situation in my state of Nebraska is a good example, which I would be happy to expound upon in questioning.

Hitting It Head-On: What We've Done in Nebraska

Nebraska in 2008 enacted a new statute creating a voluntary system of supervision at the group level. The new law enables the Director of Insurance to promulgate rules and regulations for group-wide supervision of U.S. insurance groups having a Nebraska domestic insurer within the group. Under the new law, all group supervision requirements must yield to the concept of how group activities affect the operations of the insurer.

The statutory requirements set forth a voluntary review process whereby applicants must address capital adequacy policies, intra-group transactions, risk management and internal control policies. In promulgating regulations, the Director may consider rules and regulations adopted

by the European Union or any individual country. The law also contains enforcement ramifications for noncompliance.

State Regulators are Actively Strengthening Insurance Group Supervision

To date, state insurance regulation of groups has focused on ring fencing the insurers – requiring information about any material transaction with the insurers, including regulatory approval or at least review in most cases. In the case where there is an imminent threat to an insurer's financial position, regulators may file an application for receivership in order to wall off the assets of the insurer from non-insurance entities within the group. Recent experience has shown that the activities of non-insurance entities within the group with no connection to the insurers can still have an impact on the insurers, due to contagion and reputational risk. In response to this and the recent global financial crisis, U.S. regulators and international standard setting organizations have taken steps to improve the financial services regulatory system and encourage more frequent communication and coordination among supervisors.

The Group Solvency Issues Working Group

Based on recent events and changes in the global marketplace, the NAIC established the Group Solvency Issues Working Group (GSIWG) and charged it with identifying necessary changes to the *Holding Company Act*. The working group will study the need to develop group-wide regulatory requirements and best practices, including the need for enhanced group-wide reporting and consideration of non-regulated entities. It will recommend courses of action to improve cross-border communication and coordination (both internationally and across U.S. state borders) among supervisors, including supervisors of other financial sectors where appropriate.

Group structures permitted to hold U.S.-based insurers come in many different forms. These groups may include unregulated entities as well as regulated entities – including financial services entities – within the same group holding company structure. Current state insurance holding company laws do not differentiate between a group that is local in nature and one that is internationally active. An internationally active group might simply operate across jurisdictional

borders while incorporating all entities under one jurisdiction, or it might choose to organize entities in other jurisdictions and operate from many global bases.

In the U.S., group supervision is conducted primarily through licensed entities during the quarterly financial analysis monitoring efforts arising from filings made under the *Holding Company Act*. The U.S. insurance regulatory system is often described as a "solo" or "legal" entity approach, with oversight concentrated on the legal entity, in contrast to the consolidated approach found in other jurisdictions. A better description might be "solo-plus," given the licensing oversight, financial analysis and other monitoring conducted under the auspices of the *Holding Company Act* and the examination authority of the state insurance commissioner. It is important to emphasize the "lead state" concept woven into the U.S. supervisory regime for two or more insurers operating within a single group, but domiciled in different states, as well as in the aforementioned state regulator-only coordination and communication forum called the Financial Analysis Working Group (FAWG). FAWG provides an additional layer of surveillance for groups that supplements individual state insurance departments' solvency monitoring.

Often overlooked is the existing authority of U.S. regulators to examine affiliates when information is not forthcoming from an insurer. Under state holding company laws, domestic regulators are required to review certain transactions between insurers and their affiliates to ensure that they are reasonable. As discussed, regulators must approve dividends and distribution payments in excess of a certain amount.

Enhancing Group-Wide Supervision

GSIWG has recommended that group supervision efforts be enhanced in a few key areas, building on the positive attributes of current insurance group regulation in the U.S. Specifically, GSIWG recommends that regulatory windows be added to the U.S. insurer solvency regime, regardless of the multidimensional nature of the group. The goal is to incorporate certain prudential benefits of group supervision into the solvency regime, providing a window into group operations, while building upon the existing walls that provide solvency protection. Ultimately, this "windows and walls" approach should provide much needed breadth and scope

enhancements to solvency regulation while maintaining the current high level of policyholder protection. It would also increase understanding of the potential implications of group financial and reputational risks on an insurer within the group.

Incorporation of these enhancements into the current U.S. group solvency supervision structure would advance a strong U.S. financial regulatory framework for insurers operating within groups.

The specific enhancements include the following.

1. **Communication among Regulators.** Communication among regulators is the first and most important component of group supervision of regulated entities. Communication with the primary regulator is the key, whether state, federal or international. At a minimum, this should occur on a bilateral "asked and answered" approach. While states have entered into memoranda of understanding (MOUs) with federal regulators, and a number of states have entered into confidentiality agreements with non-U.S. jurisdictions, state participation could be further coordinated on a national basis to better provide for sharing of confidential information with international regulators.

   If the level of scrutiny given to a regulated entity is heightened to a "troubled financial status," the level of communication should immediately be elevated from the "asked and answered" approach to a "proactive confidential communication." This could conceivably be accomplished through existing MOUs or through an enhanced Master MOU mechanism for sharing with federal regulators as well as with international supervisors. While the legal authority for elevating such communication to a required status may need to be examined and clarified more fully, the idea would be to ensure that confidential notifications among state, federal and international regulators regarding troubled insurers occurs on a proactive basis when the insurer is operating in a group with entities subject to federal or international oversight. The other functional and international regulators should also immediately notify state insurance regulators of financially troubled entities within their jurisdiction to the extent such entities operate within a corporate group containing an insurer.

2. **Supervisory Colleges.** U.S. state insurance regulators participate regularly in supervisory colleges for insurance-related entities around the world. My state of Nebraska, along with Delaware and Maryland, is convening a supervisory college for Berkshire Hathaway Group, Inc. The Berkshire Hathaway Supervisory College serves as a permanent platform for facilitating the exchange of information, views, and assessments, enabling members to gain a common understanding of the risk profile of the group to enhance risk-based supervision and thereby strengthen solo supervision efforts.

   Members of the Berkshire Hathaway Supervisory College have met via conference call several times over the past year to discuss procedural matters related to governance, process, timelines and information sharing agreements. They have set out goals and expectations for the supervisory college, and held substantive discussions on the regulated entities' inherent risks, financial positions and business plans to give supervisors a better understanding of the various entities regulated by supervisory college members. The supervisory college will have its first in-person annual meeting on April 14 here in Washington, D.C. It will include company presentations and discussions among regulators to facilitate the safe and efficient exchange of confidential information.

   Supervisory colleges could be formally incorporated into the regular review processes of internationally active groups through *Holding Company Act* enhancement and regulator best practices. In addition to providing a "big picture" view of the group as a whole, supervisory colleges serve to provide clear channels of communication to navigate through a potential financial crisis.

3. **Access to and Collection of Information.** Access to meaningful information about unregulated entities that include non-operating holding companies represents a challenge for all regulators. The U.S. group solvency structure should enable broader access to information upstream and with regard to all holding company groups with regulated insurance entities. It may not be necessary to license holding companies if regulation can accomplish a centralized, regular and confidential reporting mechanism by the holding company with information on all entities under its control. Tools to aid in this regard could

include enhanced Form B registration requirements and establishment of a central collection of group consolidated financial information for certain holding companies.

This is an important item. One of the strengths of the national system of state-based regulation is the multiple sets of eyes on the same or similar issues. Ensuring that all functional regulators have access to relevant and meaningful data for more than the entities directly regulated will allow this strength to be capitalized upon for the entire U.S. financial system.

4. **Enforcement Measures.** Clear regulatory tools should exist to protect the insurer and its policyholders when violations occur. This may not require registration of a holding company if sufficient jurisdiction exists to ensure access to information. Increased penalties and harsher consequences for not providing information should be put in place. Finally, standards for transactions with affiliates should be clarified and strengthened, as should standards used to establish whether an entity does or does not control an insurer.

5. **Group Capital Assessment or Requirement.** Effective group supervision should provide a window with a panoramic view of the group as a whole, thereby alerting regulators to double gearing and excessive leveraging. U.S. group supervision should include a review and assessment of capital on a group basis, in addition to retaining separate capital requirements for the solo insurance entity. An understanding of group risk factors would help to assess the risk of financial contagion within a group and better determine the potential for systemic risk.

6. **Accreditation.** Current language in the NAIC's Financial Regulation Standards and Accreditation Program requires Holding Company Filings to be reviewed. That requirement could be strengthened by requiring incorporation of a Holding Company Analysis Review Team Guideline.

Conclusion

The NAIC is a full partner with Congress and the Administration in seeking ways to improve the financial regulatory system and promote financial stability. That bears true for group supervision as well as for regulation of individual insurance companies, producers and products.

We are not seeking to *regulate* the non-insurance companies in a group, but rather seeking access to relevant information to assess and, where possible, minimize the impact of, contagion risk.

We have been pleased thus far with the cooperation we have received from other regulators where we have dealt with multi-faceted groups. We believe, however, that it would be in the national interest to formalize the information sharing that now exists, and are therefore working to secure changes to the *Holding Company Act* to accomplish that goal.

Thank you for the opportunity to testify, and I would be happy to answer your questions.

Embargoed until
March 18, 2010, at 10:00 a.m.

Statement of

Grovetta N. Gardineer
Managing Director for Corporate and International Activities

regarding

Insurance Savings and Loan Holding Companies

before the

Subcommittee on Capital Markets, Insurance and
Government Sponsored Enterprises
United States House of Representatives

March 18, 2010

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Statement required by 12 U.S.C. 250: The views expressed herein are those of the Office of Thrift Supervision and do not necessarily represent those of the President.

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I. Introduction

Good morning Chairman Kanjorski, Ranking Member Garrett and distinguished Members of the Subcommittee. Thank you for the opportunity to testify on behalf of the Office of Thrift Supervision (OTS) regarding savings and loan holding companies (SLHCs) engaged predominantly in insurance activities (insurance holding companies).

As Congress continues to consider financial regulatory reform, it is important to understand the scope of OTS's authority to supervise savings and loan insurance holding companies. While the OTS has broad authority to supervise an insurance holding company enterprise, including affiliates and subsidiaries, we think it is prudent to align the regulatory authority with the holding company enterprise's primary activities.

The statutory framework for SLHCs was designed primarily to ensure the safety and soundness of OTS-regulated insured depositories. We believe that the regulatory framework governing insurance holding companies should be amended to provide the functional regulator of the largest activity within a diversified financial company (in this case the insurance regulator) the authority to act as the consolidated holding company regulator. In that instance, the core business program of the company would align with the expertise of the holding company regulator.

My testimony today begins with a discussion of the statutory framework and legislative history of SLHC supervision and how that framework was designed to ensure

the safety and soundness of the depository institution. I will then outline OTS's approach to the supervision of SLHCs that are predominantly insurers, the OTS insurance holding company supervision program and the imperfections of a system where a regulator of a small piece of the overall organization is the only federal regulatory option for consolidated supervision. We also recommend a new regulatory framework that could enhance the oversight of the enterprise-wide health of insurance holding companies.

II. Statutory Language and Legislative History

The statutory approach to SLHCs has always been premised on preserving the safety and soundness of the subsidiary thrift. Congress passed the first SLHC legislation, known as the Spence Act, in 1959.[1] Although largely intended as "stopgap legislation," the Spence Act contained provisions prohibiting savings associations from investing in or in any way having an interest in the securities of the holding company or its subsidiaries.[2] Similarly, savings associations were prohibited from extending credit to their holding companies or their subsidiaries.[3]

Seven years after enactment of the Spence Act, Congress revisited SLHC regulation by enacting the Savings and Loan Holding Company Amendments of 1967[4] which came to be known as the Savings and Loan Holding Company Act (SLHCA).[5] Unlike the Spence Act, which was limited in its scope, the SLHCA provided a comprehensive statutory framework for the registration, examination and regulation of SLHCs. Among other things, this comprehensive law was designed to preserve the safety and soundness of the subsidiary thrift by protecting holding company subsidiary institutions from overreaching by affiliates in a holding company structure. In the Senate Banking Committee hearings for this legislation, Federal Home Loan Bank Board (FHLBB) Chairman Horne noted that with most business enterprises it is of no public concern how a parent company chooses to use its subsidiary, "[b]ut when one of those subsidiaries has the bulk of its liabilities in the form of savings entrusted to it by the public and when those liabilities are insured by a public agency, then there is a very strong reason for public concern over the purposes which that company is made to serve and over dealings of any sort that are not conducted at arm's length."[6]

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[1] Pub. L. 86-374, 73 Stat. 691 (1959).
[2] *Id.*
[3] *Id.*
[4] Pub. L. 90-225 (1968).
[5] The SLHCA is now section 10 of the Home Owners' Loan Act. 12 U.S.C. 1467a.
[6] Savings and Loan Holding Companies: Hearings on S. 1542 Before the Senate Committee on Banking and Currency," 90th Cong., 1st Sess. at 27 (1967) (Statement of John E. Horne).

Congress next amended the SLHCA as part of the Competitive Equality Banking Act of 1987 (CEBA).[7] The amendments did not alter the fundamental purpose of the SLHCA—to protect the safety and soundness of the subsidiary thrift.

Two years after the enactment of CEBA, Congress again amended the SLHCA as part of the Financial Institutions Reform, Recovery and Enforcement Act of 1989 (FIRREA).[8] The FIRREA amendments were premised on preserving the safety and soundness of the subsidiary institution. For example, FIRREA provided the OTS with an expedited enforcement remedy against holding companies whose activities endanger the financial stability or safety and soundness of their subsidiary thrift.[9] Savings institutions were generally made subject to Sections 23A, 23B and 22(h) of the Federal Reserve Act, in the same manner and to the same extent as those sections apply to Federal Reserve member banks.[10]

Ten years after FIRREA, Congress passed the Gramm-Leach-Bliley Act of 1999 (GLBA).[11] As the Subcommittee is well aware, the GLBA facilitates affiliations among banks, securities firms and insurance companies. So long as certain conditions are met, a bank holding company can qualify as a financial company and engage in a wide variety of services that are financial in nature.[12]

In the GLBA Congress instituted special provisions with respect to OTS and the Board of Governors of the Federal Reserve System (Board) supervision of functionally regulated subsidiaries of holding companies, such as insurance companies. Generally, these provisions require coordination with the functional regulator and require the OTS and the Board to predicate certain actions on the safety and soundness of the subsidiary depository institution. GLBA also amended the SLHCA to prohibit new unitary SLHCs from engaging in nonfinancial activities or affiliating with nonfinancial organizations.[13] Existing unitary holding companies were "grandfathered." The restrictions, however, continued to allow financial activities to be conducted by the holding company, to the same extent as a bank holding company, including insurance activities.

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[7] Pub. L. 100-86, 100 Stat. 552 (1987).
[8] Pub. L. 100-73, 103 Stat. 183 (1989).
[9] 12 U.S.C. 1467a(p)(1).
[10] 12 U.S.C. 1468
[11] Pub. L. 106-102, 113 Stat. 1338.
[12] 12 U.S.C. 1843(l)(1).
[13] *Id.* at § 401.

III. OTS Holding Companies Engaged Predominantly In Insurance Operations

OTS supervised insurance holding companies are diverse. They include some of the largest publicly held insurance companies in the United States, large and small mutual insurance companies, privately held companies and fraternal organizations. These holding companies own insurance subsidiaries domiciled in almost every state in our country. These operations offer insurance and banking products to citizens across the United States. Some have insurance operations in foreign countries as well. These holding companies provide products across the various sectors of the insurance industry including life insurance, annuities, title and property and casualty insurance for consumers and businesses of all sizes. Through their savings association subsidiaries they are able to offer a full range of financial products.

Included in the 35 insurance holding companies supervised by OTS are Prudential, Principal, Allstate, State Farm, Nationwide, TIAA-CREF and The Hartford. In addition, OTS regulates holding companies with significant insurance activities that combine securities activities as well, such as Ameriprise. OTS also regulates approximately another 39 holding companies that engage in insurance activities to a lesser degree, but are not considered predominantly insurance companies.

IV. OTS Holding Company Supervision Program

Once a company acquires or charters a thrift institution, as a SLHC it is subject to regulatory examination and monitoring by the OTS. As the primary federal regulator of savings and loan insurance holding companies, the OTS has the authority to examine each insurance holding company, including its subsidiaries subject only to certain obligations under the GLBA to coordinate with the functional regulator[14]. We commonly refer to this overall entity as the holding company enterprise. In its examination and supervision of the enterprise, OTS uses a risk-focused approach that considers the combined risk profile of the holding company, its financial health and stability, and the interdependence of entities within the structure.

The primary objective of a risk-focused examination of an insurance holding company is to identify and examine the areas of the business that pose the greatest degree of risk to the condition of the overall enterprise and to the thrift. The initial scope of the examination targets the areas that have higher than normal risk characteristics. Employing this approach requires examiners to use judgment in determining the level of

[14] Pub.L. 106-102, 113 Stat. 1338.

review, testing and analysis necessary to assess the condition of the enterprise. Accordingly, the scope of each examination is specifically tailored to the risk associated with the enterprise and it is determined on a case-by-case basis. It may also change from year-to-year as OTS sets different areas for targeted review.

The examination goal is consistent across all types of holding company enterprises; however, the level of review and amount of resources needed to assess a complex structure, such as an insurance holding company, is far greater than what would be required for a less complex holding company.

Executing the OTS holding company examination approach for insurance structures can require advanced financial and analytical skills to address the complexity of some of these organizations. Aggregating the risk of individual companies within the structure in order to formulate an evaluation of the overall consolidated risk of the organization requires both expertise and judgment. OTS assigns some of its most experienced examiners to the examination of insurance holding companies. Their extensive grounding in financial regulatory concepts and experience in coordinating and communicating with holding company staff provides the foundation for reviewing the broader scope of activities in a diverse financial company with insurance operations. Still, fully understanding insurance holding companies involves an intensive learning curve as examiners become acclimated to the highly technical concepts of insurance underwriting and reserving, as well as terminology and interaction with functional regulators both domestic and foreign.

Coordination with Other Regulators

Consultation with other regulators is essential to OTS's supervision of SLHCs. OTS seeks to achieve the legislative goal of reducing duplication by sharing information and working closely with other state and federal regulators. In conducting its review of an insurance holding company enterprise, OTS relies on the state insurance regulators for information and findings regarding the entity for which they are functionally responsible. To limit regulatory duplication, OTS has entered into regulatory cooperation agreements with all but two state insurance regulators.

As a first source, OTS examiners use readily available information about an insurance company in the holding company enterprise by obtaining and reviewing reports the company submits to its primary regulator, information that it reports publicly and externally audited financial statements.

OTS may also request examination information directly from the company if the insurance regulator cannot provide it. It is important to note that OTS may only seek information directly from the company if that information meets certain conditions. Specifically, the information can only be requested if it is needed to assess: (1) a material risk to a thrift or holding company; (2) compliance with a federal law that OTS has specific authority to enforce against the functionally-regulated entity, or (3) the systems for monitoring and controlling the financial and operational risks that may threaten the safety and soundness of a thrift.

Examination Components

Examination of holding companies is an important part of OTS's supervisory program. OTS examiners' work assesses the condition of the holding company enterprise and helps ensure that the operations of the holding company do not harm the thrift affiliate.

In carrying out its regulatory function regarding holding companies, the OTS evaluates four components, collectively known by the acronym "CORE."

The "C" in the CORE rating stands for "Capital." In its review of a SLHC's capital adequacy, OTS considers the risk inherent in the enterprise's activities and the ability of capital to absorb unanticipated losses, support the level and composition of debt of the parent company and subsidiaries, and support business plans and strategies.

"O" is for "Organizational Structure." This component involves identifying the organizational structure and ownership, and assessing any changes. This part of the examination also includes an assessment of: (1) lines of business and activities, and the inherent risks they pose; (2) concentrations of risk; and (3) the nature and volume of intra-group transactions and significant intercompany relationships.

"R" represents "Risk Management," which involves the ability of the board and executive management to identify, measure, monitor and control risk within the holding company enterprise. Managing risk is fundamental to the success of any business venture. OTS expects holding companies to have adequate risk management practices, including strong corporate governance and a system of internal controls. Such risk management practices should be commensurate with the size and complexity of the holding company enterprise.

"E" represents "Earnings/Liquidity," which involves the overall financial performance of the consolidated holding company enterprise, including the quality of consolidated earnings, profitability and liquidity. This includes the holding company's

earnings trends and cash flow, as well as the relative contributions and dividend payout ratios of significant subsidiaries, and the current and prospective effect on subsidiaries, including the thrift.

Once OTS examiners have completed their review of the CORE components, they develop a composite rating, which is the overall assessment of the holding company enterprise as reflected by consolidated risk management and consolidated financial strength. Examiners exercise judgment in determining the relative importance of each CORE component to the safe and sound operation of the holding company.

V. Areas for Improvement in the Consolidated Supervision of Insurance Holding Companies

The statutory regime governing SLHCs is premised primarily on preserving the safety and soundness of the subsidiary thrift. Clearly OTS would not have a role in the supervision of an insurance holding company enterprise if not for its relationship with a savings association.

We believe that a holding company that engages predominantly in insurance activities should be regulated by an insurance regulator. While the OTS is effective in coordinating relationships with state insurance regulators, state insurance regulators are in the best position to control and supervise insurance holding companies because insurance is the predominant activity of the enterprise.

Typically, insurance companies come to OTS with established insurance operations and a pre-existing relationship with state insurance regulators. As such, they are unfamiliar with the concept of holding company regulation. As OTS steps into this role it can be awkward to familiarize the company with our involvement beyond the confines of the savings association, especially in cases where the thrift institution is a small part of the company's operations. To address this, OTS can and does include conditions in our application approvals that outline our supervisory expectations.

Furthermore, some provisions of law designed to reduce regulatory burden can impede our ability to address swiftly some supervisory concerns focused primarily on the impact to the subsidiary thrift itself, as opposed to the insurance company subsidiary. For example, with respect to capital adequacy requirements, OTS is prohibited from proscribing such requirements for an insurance company subsidiary.[15] Similarly, OTS

[15] 12 U.S.C. 1844(c)(3); 1831v(a). We note that on December 11, 2009, the House passed H.R. 4173, the Wall Street Reform and Consumer Protection Act, which among other things eliminates this provision and the other provisions discussed in this paragraph. *See*, H.R. 4173, as engrossed, sec. 1303(e).

may not require an insurance company subsidiary of a holding company to provide capital or other funds or assets to a savings association subsidiary of the holding company if the state insurance supervisor determines that such action would have a materially adverse effect on the financial condition of the insurance company.[16] In extreme circumstances, OTS could require divestiture of the thrift institution.[17]

VI. Recommendation for a New Regulatory Structure for Insurance Holding Companies

We recommend that Congress improve the regulatory framework for the consolidated supervision of insurance holding companies. We suggest that the functional regulator of the largest activity within a diversified financial company should be the holding company regulator, with jurisdiction over the holding company and all non-functionally regulated entities. We believe there is significant benefit to housing the supervision of holding companies with the supervisor of the predominant underlying regulated activity. An unintended consequence of functional regulation is that it takes time to coordinate, and additional efforts to ensure consistent treatment.

A holding company regulator should have authority to monitor the activities of the affiliates, to exercise full enforcement authority and to implement information-sharing arrangements between entities in the holding company structure and their functional regulators. The regulator should have the authority to impose capital requirements, restrict activities and otherwise regulate the operations of the holding company and the non-functionally regulated affiliates.

We believe the authority to supervise the entire corporate structure of an insurance holding company could be housed within a federal insurance regulator, if Congress chose to create one. In the absence of the creation of a federal insurance regulator, however, we believe that at a minimum, a federal insurance office should be established with authority over insurance holding companies and non-functionally regulated affiliates.

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[16] 12 U.S.C. 1844(g)(1); 1831v(a).
[17] 12 U.S.C. 1844(g)(3); 1831v(a).

VII. Conclusion

A fundamental requirement for prudent risk management of a holding company is effective oversight and enforcement authority over the entire organization. We appreciate the opportunity to share OTS's recommendations for a stronger framework that would accomplish this for insurance holding companies. We look forward to working with you on these important issues in the future.

For release on delivery
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Statement of

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Board of Governors of the Federal Reserve System

before the

Subcommittee on Capital Markets, Insurance, and Government Sponsored Enterprises

Committee on Financial Services

United States House of Representatives

March 18, 2010

Chairman Kanjorski, Ranking Member Garrett, and other members of the Committee, thank you for the invitation to today's hearing to discuss the supervision and oversight of insurance companies. In the United States, primary supervisory and regulatory authority for insurance companies is vested with the states. The Federal Reserve does, however, serve as consolidated supervisor for bank holding companies (BHCs), including financial holding companies (FHCs) established under the Gramm-Leach-Bliley Act (GLB Act), some of which are affiliated with insurance companies. In addition, the Federal Reserve serves as the primary federal supervisor for state-chartered banks that are members of the Federal Reserve System (state member banks), many of which engage in insurance sales activities.

In my statement I will first describe the scope of the Federal Reserve's supervisory and regulatory authority for BHCs, FHCs, and state member banks and provide an overview of the types of insurance activities that may be conducted by banking organizations supervised by the Federal Reserve. I will then discuss the Federal Reserve's approach to supervising BHCs, FHCs, and state member banks both generally and with respect to any insurance activities that may be conducted by these organizations.

Background

The Federal Reserve has supervisory and regulatory authority for BHCs; state member banks; U.S. operations of foreign banking organizations that have a branch, agency, or commercial lending subsidiary in the United States; and certain other financial institutions and activities. As of year-end 2009, a total of 5,635 top-tier U.S. BHCs were in operation. These institutions controlled 5,710 insured commercial banks and held approximately 88.5 percent of all insured commercial bank assets in the United States. Also as of year-end 2009, 844 state-chartered banks (excluding nondepository trust companies and private banks) were members of

the Federal Reserve System. We work with other federal and state supervisory authorities to ensure the safety and soundness of the banking industry, foster stability of the financial system, and provide for the fair and equitable treatment of consumers in financial transactions.

While banking organizations have been widely involved in insurance sales activities for many years, the ability of banking organizations to broadly underwrite insurance is both more limited and more recent. For example, state banks--including state member banks--generally are permitted to act as an agent in the sale of insurance to the extent permitted by state law, and most states authorize this activity. Federal law, however, generally prohibits national or state-chartered insured banks from underwriting insurance, with certain exceptions.[1] Prior to the GLB Act, the ability of BHCs to affiliate with a company engaged in insurance sales or underwriting activity also was quite limited.

Since 2000, the GLB Act permits those BHCs that qualify to be, and then elect to become, an FHC to engage in, or affiliate with a company engaged in, the sale or underwriting of any type of insurance. To qualify as an FHC, all of a BHC's depository institution subsidiaries must be well capitalized and well managed, and all of the company's insured depository institutions (other than certain newly acquired institutions) must have a satisfactory or better record of performance under the Community Reinvestment Act.

Approximately 548 financial services organizations with total assets of $16.1 trillion (or 86 percent of all assets controlled by BHCs) operate in the United States as FHCs. Of these companies, 507 are domestic FHCs and 41 are foreign-owned FHCs. As of September 30, 2009, a total of 33 FHCs reported engaging in insurance underwriting activities pursuant to the expanded authorities provided by the GLB Act, of which 22 were domestic companies and 11 were foreign-owned organizations. These 33 organizations reported an aggregate of

[1] See 12 U.S.C. § 1831a; 15 U.S.C. § 6712.

$551 billion of insurance-related underwriting activities, which represents 3.4 percent of total FHC assets of $16.1 trillion.

Additionally, some 194 FHCs reported conducting insurance sales activities. Because insurance sales activities are conducted as agent (and not as a principal, as with insurance underwriting), insurance sales activities typically do not account for a significant percentage of the assets of banking organizations.

Federal Reserve Supervisory Standards and Approach

The Federal Reserve is involved in both regulation, which is establishing the rules within which banking organizations must operate, and supervision, which is ensuring that banking organizations abide by those rules and remain safe and sound. The Federal Reserve's regulations impose consolidated capital requirements on BHCs (including FHCs) and state member banks, restrict intercompany transactions between an insured depository institution and its affiliates, and implement the activity restrictions that the Congress has established for banking organizations to help protect the federal safety net and prevent the mixing of banking and commerce. Because rules and regulations in many cases cannot reasonably prescribe the exact practices each organization should use in managing the risks it faces, supervisors provide policies and guidance that expand upon requirements set forth in rules and regulations and that establish expectations for the range of acceptable practices. Supervisors rely extensively on these policies and guidance as they conduct examinations or inspections and assign supervisory ratings. The Federal Reserve supervisory staff regularly conduct on-site examinations and off-site monitoring to ensure the safety and soundness of supervised state member banks.

As consolidated supervisor, the Federal Reserve also conducts regular inspections of all BHCs, including FHCs. The primary purpose of these inspections is to ensure that the holding

company and its nonbank subsidiaries do not pose a threat to the BHC's insured depository institution subsidiaries. In conducting our supervisory and inspection activities, we work closely with the primary supervisor of a BHC's subsidiary depository institutions, as well as with the functional regulator of any securities broker-dealer or insurance company owned by the BHC. Indeed, the GLB Act requires that the Federal Reserve rely, to the fullest extent possible, on the reports of examinations prepared by the relevant state insurance authority of any insurance company subsidiary of a BHC.

Our supervision of BHCs and FHCs is focused on the consolidated risk exposures, financial strength, capital adequacy, and liquidity of these firms. In short, our approach is risk-focused, and encompasses all of the risks of the firm. Inspections are built around a rating system introduced in 2005 that reflects the shift in supervisory practices away from a historical analysis of financial conditions toward a more dynamic, forward-looking assessment of risk-management practices and financial factors. Under the system, known as RFI, but more fully termed RFI/C(D), holding companies are assigned a composite rating (C) that is based on assessments of three components: risk management (R), financial condition (F), and the potential impact (I) of the parent company and its nondepository subsidiaries on the subsidiary depository institution. The fourth component, depository institution (D), is intended to mirror the primary supervisor's rating of the subsidiary depository institution.

In October 2008, the Federal Reserve finalized comprehensive supervisory guidance, initiated prior to the onset of the financial crisis, to enhance and clarify our role as consolidated supervisor of BHCs, including FHCs. For example, it improves the consistency of the Federal Reserve's supervisory practices and assessments across institutions with similar activities and risks, and directs examiners to pay special attention to areas that are critical to managing

firmwide risks, such as primary governance functions and risk controls, material business lines and nonbank operations, funding and liquidity management, consumer compliance, and other key activities and risks. The enhanced consolidated supervisory approach also emphasizes several elements designed to foster financial stability and deter or manage financial crises, including an increased focus on clearing and settlement activities in critical financial markets. The guidance also reiterates the need as required by statute to rely, to the fullest extent possible, on information from the appropriate primary or functional regulators of the bank, securities, and insurance subsidiaries of an organization in order to make an informed assessment about the nature of the risks posed to the insured depository institution affiliate and the consolidated organization. Importantly, it also describes how the Federal Reserve will coordinate its activities and share information with the functional regulators of a BHC's subsidiaries.

In the spring of 2009, the Federal Reserve led the Supervisory Capital Assessment Program, popularly known as the bank "stress test," which helped restore confidence in the banking system and represented a turning point in the financial crisis. An important lesson of that program was that combining on-site examinations and inspections with a suite of quantitative and analytical tools can greatly improve comparability of the results and better identify potential risks or outlier situations. In that spirit, the Federal Reserve is developing an enhanced quantitative surveillance program for large BHCs. Supervisory information will be combined with firm-level, market-based indicators and aggregate economic data to provide a more complete picture of the risks facing these institutions and the broader financial system. Making use of the Federal Reserve's unparalleled breadth of expertise, this program will apply a multidisciplinary approach that involves economists, specialists in particular financial markets, payments systems experts, and other professionals, including bank supervisors.

Appropriate enhancements of both prudential and consolidated supervision will only increase the need for supervisors to be able to draw on a broad array of economic and financial knowledge and experience. The insights gained from the macroeconomic analyses associated with the formulation of monetary policy, and from the familiarity with financial markets derived from our open market operations and payments systems responsibilities, have the potential to add enormous value to holding company supervision.

The current financial crisis has clearly demonstrated that risks to the financial system can arise not only in the banking sector, but also from the activities of other financial firms--such as investment banks or insurance companies--that traditionally have not been subject to the type of regulation and consolidated supervision applicable to bank holding companies. To close this important gap in our regulatory structure, legislative action is needed that would subject *all* systemically important financial institutions to the same framework for consolidated prudential supervision that currently applies to BHCs and FHCs. Such action would prevent financial firms that do not own a bank, but nonetheless pose risks to the overall financial system because of the size, risks, or interconnectedness of their financial activities, from avoiding comprehensive supervisory oversight.

Federal Reserve Supervision of Insurance Activities

In supervising banking organizations that are engaged in insurance activities, the Federal Reserve is guided by the same principles that govern our supervision of banking organizations generally. For BHCs and FHCs conducting insurance activities, we focus on assessing and, if necessary, addressing the potential risk that those activities may pose to the depository affiliates and the consolidated financial condition of the BHC or FHC. In the case of state member banks engaged in insurance activities, we focus primarily on assessing and limiting the risk of those

activities to the relevant institution and ensuring compliance with the consumer protections for bank sales of insurance products established by the GLB Act.

While our general approach is the same, we also adjust our supervisory methods and analysis to account for the unique risks and nature of insurance products. For example, although most risks--including credit, market, operational, liquidity, reputational, and legal risks--are not unique to BHCs with insurance underwriting activities, our supervisory approach recognizes that these risks may arise in new or different ways at such firms engaged in insurance activities. Our supervisory approach also recognizes the additional risks arising from the underwriting of life insurance policies and property and casualty insurance policies. We incorporate these risks in our assessments of the overall financial strength of a BHC's or FHC's consolidated risk-management processes, as well as any potential effect on affiliated depository institutions.

Federal Reserve oversight of insurance activities of state member banks varies based on the nature and scope of the institution's insurance activities. We have supervisory tools for assessing the robustness of the risk-management processes for corporate programs for insurable risks, including purchased insurance on the lives of bank employees (bank-owned life insurance). Additionally, we have supervisory tools for assessing the management of the risks associated with retail sales of insurance on bank premises or on behalf of a bank and the Consumer Protection in Sales of Insurance provisions of the Board's Regulation H.

In performing our assessments of the financial strength and consolidated risk management of BHCs or FHCs, the Federal Reserve focuses on corporate-level internal policies and procedures, as well as consolidated risk reports of the firms. In addition, we actively engage management in discussions of the firms' overall strategy, lines of businesses, financial condition, and internal risk and capital adequacy processes. The Federal Reserve may conduct off-site

monitoring and engage management in further discussions or conduct targeted reviews to enhance our understanding of a BHC's or FHC's insurance activities.

In carrying out its supervisory activities, the Federal Reserve routinely communicates with the primary or functional regulatory authorities, including those responsible for licensing and regulating the insurance subsidiaries of the BHC or FHC. This communication is an important part of our approach to the consolidated supervisory processes for two reasons. First, functional regulators provide information about the legal and regulatory framework in which insurance activities are conducted at the subsidiary that they license and regulate. Similarly, the functional regulators' assessments of risk and risk management at the insurance subsidiary help inform our assessments of any potential effect that these activities may have on affiliate depository institutions and the consolidated organization's financial condition or risk-management practices.

To facilitate this information sharing, over the past decade, the Federal Reserve Board has executed memoranda of understanding with the insurance regulatory authorities of all 50 states, the District of Columbia, and Puerto Rico. The Federal Reserve Board and the other federal banking agencies also coordinate with the appropriate state insurance authorities when a BHC, FHC, or insured depository institution plans to acquire or affiliate with a company engaged in insurance activities. In addition, in carrying out our BHC supervisory responsibilities, we communicate with international insurance supervisors if appropriate depending on the size, nature, and extent of a BHC's or FHC's insurance businesses.

To assist its staff in understanding the risks arising from insurance activities, the Federal Reserve has designed and implemented training programs and developed examiner tools. Additionally, in conjunction with the National Association of Insurance Commissioners (NAIC)

and state insurance regulatory authorities, the Federal Reserve drafted materials comparing various aspects of the regulatory paradigms for banking organizations and insurance companies that are routinely made available to supervision staff. For example, the Federal Reserve and the NAIC have collaborated on three published reports that were intended to facilitate better communication and understanding on banking and insurance regulation, risks, and capital requirements. In May 2002, the Federal Reserve and the NAIC issued the first report, titled "Report of the NAIC and the Federal Reserve System Joint Subgroup on Risk-Based Capital and Regulatory Arbitrage." It compares banking and insurance company risk-based capital formulas, and identifies potential opportunities for regulatory capital arbitrage between insurance and bank subsidiaries. The report acknowledges that the two regulatory capital frameworks differ fundamentally in the risks they are designed to assess, and that capital requirements for assets, liabilities, and various risks are treated differently.

The second report, titled "Report of the NAIC and the Federal Reserve System Joint Subgroup on Financial Issues," was issued in June 2003. It discusses the components of risk arising from insurance activities and relevant insurance regulatory tools that might assist the Federal Reserve in supervising FHCs conducting insurance activities. The report includes a mapping of insurance industry risks into the Federal Reserve's defined banking risks. The third report, titled "Report of the NAIC and the Federal Reserve System Joint Troubled Company Subgroup: A Comparison of the Insurance and Banking Regulatory Frameworks for Identifying and Supervising Companies in Weakened Financial Condition," was issued in April 2005. This report outlines the different approaches used by banking and insurance regulators for identifying and intervening in troubled company and troubled holding company situations, including

regulatory authorities, on- and off-site company financial condition monitoring tools, time frames for intervention, and types of actions taken.

Conclusion

While the Federal Reserve is not the primary supervisor of insurance companies, certain organizations we supervise do engage in, or have subsidiaries that engage in, insurance activities. The Federal Reserve's role as the supervisor of a BHC or FHC is to review and assess the consolidated organization's operations, risk-management systems, and capital adequacy to ensure that the holding company and its nonbank subsidiaries do not threaten the viability of the company's insured depository institutions. In this role, the Federal Reserve serves as the "umbrella supervisor" of the consolidated organization. In fulfilling this role, the Federal Reserve relies to the fullest extent possible on information and analysis provided by the appropriate supervisory authority of the company's bank, securities, or insurance subsidiaries.

Recent experience shows the need for the Federal Reserve's approach to consolidated supervision of the holding company in addition to, and distinct from, bank supervision. Large organizations increasingly operate and manage their businesses on an integrated basis with little regard for the corporate boundaries that typically define the jurisdictions of individual functional supervisors. Indeed, the crisis has highlighted the financial, managerial, operational, and reputational linkages among the bank, securities, commodity, insurance, and other units of financial firms.

The customary focus on protecting the bank within the holding company, while necessary, is clearly not sufficient now, when systemic risk can arise wholly outside of insured depository institutions. Similarly, the premise of functional regulation--that risks within a diversified organization can be evaluated and managed properly through supervision focused on

individual subsidiaries within the firm--has been undermined further; the need for greater attention to the potential for damage to the bank, the organization within which it operates, and, in some cases, the financial system generally, requires a comprehensive and integrated assessment of activities throughout the holding company.

This concludes my prepared remarks, and I would be happy to answer any questions you may have.

Testimony of Property Casualty Insurers Association of America (PCI)

before the Subcommittee on Capital Markets, Insurance and Government Sponsored Enterprises

House Committee on Financial Services

Hearing on Insurance Holding Company Supervision

March 18, 2010

The Property Casualty Insurers Association of America (PCI) appreciates the opportunity to submit testimony concerning insurance holding company supervision. PCI is the leading property-casualty trade association, representing more than 1,000 insurers, the broadest cross-section of insurers of any national trade association.

PCI supports the efforts of the Committee on Financial Services in general and the Subcommittee on Capital Markets in particular to address the failures that helped create the financial crisis of 2007-09. PCI has submitted past testimony to the Committee with detailed analysis of gaps in the current financial services regulatory structure and proposals for legislation to facilitate systemic risk supervision and greater regulatory coordination. It is critical to recognize, however, that the regulatory failures were *not* failures of state insurance solvency supervision or holding company regulation, but rather gaps in federal regulation or implementation of federal holding company oversight of more interconnected and systemically risky market segments. While some recently impaired financial conglomerates had property-casualty insurance subsidiaries, these were primarily federally regulated holding companies. No federal assistance has been requested or provided for property-casualty activities, no insurance activities were a primary cause of the crisis, and state supervision of insurance holding companies with respect to the safety and soundness of the insurance marketplace has been relatively very successful compared to federal holding company regulation. The Congressional response to the crisis must not restructure or undermine the portions of the system that worked. Nor should any legislation impose

unnecessary additional burdens on those sectors of the financial services industry that do not pose systemic risk or subsidize and create additional moral hazard on behalf of the firms that helped cause the debacle.

Insurer members of insurance holding companies are successfully regulated for solvency by the states

Solvency regulation of insurance companies in the United States is conducted on a "solo-plus" basis. This means that basic financial regulation deals primarily with each insurer as a separate legal entity, and the tools of the state regulatory system are designed to make sure that each legal entity remains solvent, regardless of whether it is a stand-alone insurer, part of a group of insurers or a member of a financial conglomerate. State regulators also recognize, however, that risks from other members of a group can affect an insurer within the group if the proper firewalls between insurance and non-insurance activities are not respected. For these reasons insurance holding company legislation and regulation requires prior approval by insurance regulators for changes in control and payment of significant dividends, and prior notice and actual or deemed approval (30 days notice without disapproval) for material reinsurance and other transactions between affiliates. State financial analysts are provided with the annual financial statement of the ultimate holding company of each insurer. Coordinated financial examinations are conducted for insurance groups, with a "lead state" regulator (generally the state of domicile of the parent or largest company) coordinating the exam. Additionally, the National Association of Insurance Commissioners' (NAIC) Financial Analysis Working Group, a group of senior financial regulators, monitors large insurers and groups and assists domiciliary regulators with analysis of and action on financially troubled companies. These state activities all help to ensure the financial stability of holding companies and their subsidiaries and to prevent harm to policyholders or the general public.

This system has worked very successfully to limit financial contagion and minimize insurance failures despite the "perfect storm" of catastrophe and financial market losses in 2008. The AIG situation is sometimes cited to the contrary, but it is important to note that AIG's *insurance* companies were well-capitalized and well-regulated entities, separate from AIG's ultimate holding company and the Financial Products Unit that caused so much of AIG's difficulties. State insurance regulators made sure that the insurance companies were strong and their assets were separate from the rest of AIG. Transfer of any significant amounts of capital from the insurance companies to the other AIG entities would have required the prior approval of the insurance regulators, which in the event was not given.

Some have speculated that forcing AIG's parent (noninsurance) holding company to undergo bankruptcy proceedings would have caused significant risk to insurance policyholders and "potentially disrupt(ed) households' and businesses' access to basic insurance."[1] We respectfully disagree. State regulators used the normal tools of solvency regulation – risk-based capital standards, conservative state accounting and financial reporting standards, investment restrictions and many others – to make sure that the insurance companies remained safe and continued to operate. The National Association of Insurance Commissioners created two special AIG-related working groups to enhance cooperation between the states. Even in the case of trouble, regulators had the authority to step in and put the companies under their supervision, to help ensure that policyholders and claimants were paid..

Insurance solvency regulation – of solo insurers and of groups – by and large performed far better than other forms of financial services regulation during the financial crisis. The systemic risk posed by AIG came from the non-insurance parts of the group. In the worst financial storm we have seen since the Great Depression, the strength of the U.S. insurance industry and its regulation protected the millions of individuals and businesses that rely on it.

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[1] Testimony of Secretary of the Treasury Timothy F. Geithner before the House Committee on Oversight and Government Reform, January 27, 2010.

Congress should address gaps in the regulation of large financial conglomerates (that may include insurers)

Despite the success of the current insurance holding company regulatory system to date, there is always room for improvement. PCI believes regulators should examine several potential improvements to insurance group supervision:

- Strengthening the role of a lead state regulator – State regulators should consider creation of a lead state regulator role to facilitate overall review of an insurance group's activities, as well as the potential risks posed by non-insurer group members.
- Streamlining group supervision – While the NAIC has made strides in increasing coordination between states with its move to risk-focused financial analysis and examination, additional improvements are always needed.
- Communication and coordination between insurance and other financial regulators of entities within a conglomerate group should be increased. PCI is interested in the concept of "supervisory colleges", so long as they are properly integrated into the current insurance regulatory structure and do not result in additional of an unnecessary layer of regulation or excess cost.
- The NAIC is examining these and other issues in its Group Solvency Issues Working Group as part of its current Solvency Modernization Initiative (SMI). PCI supports the SMI project and is working with the Working Group.

The financial crisis has also brought into sharp focus a key failing of our current financial services regulatory system -- the near total absence of an understanding of the nature of systemic risk and effective systemic risk regulation. The Federal Reserve Board currently has "umbrella" systemic risk authority only over financial holding companies, and that regulation has been bank-centric to date, failing to carefully monitor and understand risks posed by non-bank entities within the financial holding company structure. Former Federal Reserve Chairman Alan

Greenspan has admitted that the Fed's regulatory focus failed to effectively monitor and regulate the systemic risk to the larger economy. The Board does not have systemic risk regulatory authority over thrifts or thrift holding companies (Indymac, Countrywide, Washington Mutual), investment bank holding companies (Lehman Brothers, Bear Stearns) or other entities such as derivatives firms (AIG Financial Products), and other prudential regulators who do have jurisdiction over those entities have not focused on systemic risk. It is vital that these regulatory gaps be filled now, but equally vital that the approach to filling them be based on a solid understanding of what systemic risk is and which entities within our financial system do and do not pose systemic risk.

PCI has testified several times before this subcommittee on the subject of systemic risk. We would like to briefly remind you of several of the most key issues:

- Property-casualty insurance did not cause the financial crisis and is not systemically risky. They are not highly leveraged and are not highly interconnected with other financial firms as a source of credit or liquidity. A failure in the property-casualty industry – even of a large insurer -- would be very unlikely to create significant systemic risk in the larger economy.

- Systemic risk regulation, including regulation of systemic risk at the holding company level, should focus on entities that are truly systemically risky, and not on non-systemically risky industries such as property casualty insurance.

- A responsible system of resolving troubled institutions must accompany any new systemic risk regulation. Such a system must: (a) recognize that resolution of property-casualty insurers is already conducted effectively by state insurance regulators and guaranty funds; (b) ensure that each industry pays its own resolution costs (as insurers do now) and that industries do not cross-subsidize each other.

Insurance groups should not be subject to additional regulation for systemic risk, or assessment for the failures of other financial industry segments

Although property/casualty insurers in general do not pose systemic risk to the financial system or the U.S. economy at large, proposals to assess non-risky insurance companies to pay for the resolution of risky firms from other financial industry sectors *would* create risk to the entire system, increasing moral hazard by shifting the costs of systemic risk from those entities that generate it to those that do not. In so doing these proposals would penalize insurance consumers and businesses across the country by requiring them to pay for the failures of riskier, more highly-leveraged investment banks and securities firms.

Thank you for the opportunity to provide the subcommittee with information on the question of the regulation of insurance holding companies. PCI looks forward to continuing to be a resource to the subcommittee on financial services regulatory reform issues.

May 12, 2010

Hon. Paul Kanjorski
Chairman, Subcommittee on Capital Markets, Insurance and Government-Sponsored Enterprises
Committee on Financial Services
United States House of Representatives
2188 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Kanjorski:

I received your April 13, 2010, letter regarding my March 18, 2010, testimony on insurance holding company supervision and have the following responses for you. First, with regard to your question "how many insurance operating entities are part of a holding company that is a) regulated by the state as an insurance operating company; b) regulated by a federal financial regulator; and c) not subject to financial regulatory supervision," please note my response is provided with the assistance of the National Association of Insurance Commissioners and is comprised of data from 50 state insurance departments and the District of Columbia.

Out of **6,695** risk-bearing insurance legal entities regulated and supervised by the state insurance departments, **5,220 (78%)** insurance legal entities were affiliated with a holding company system (i.e., part of a group). The term "affiliated" is used because not all insurance legal entities are 100% owned or controlled by one single group; thus, several unaffiliated groups may have ownership interests in a single insurance legal entity.

Response (a): In responding to a) I understand the question to ask how many holding company systems include an insurance legal entity as the top parent entity which would therefore be regulated by the state as an insurance operating company. Please note that most insurance holding company systems are not structured in such a manner. Rather, there is typically a non-operating holding company or a non-financial operating entity as the top level company in the holding company system for various legal and tax purposes. An exception to this typical structure exists for insurers organized as mutual insurance companies. Nevertheless, out of the 5,220 insurance legal entities that are affiliated with a holding company system, **764** have an insurance legal entity as the top parent entity.

Response (b): In responding to b) I understand the question to concern those holding company systems where the Federal Reserve Board is the umbrella regulator. There are **105** insurance legal entities in holding company systems where the Federal Reserve Board is the umbrella regulator of the holding company system. Pursuant to the Gramm-Leach-Bliley Act, most federal regulators are functional regulators and thus are technically not considered the lead financial regulator of the holding company system; only the Federal Reserve Board is seen as the holding company regulator of Financial Holding Companies (FHCs).

With special regard to AIG, AIG became a unitary thrift holding company when the Office of Thrift Supervision (OTS) granted AIG approval to organize AIG Federal Savings Bank. The Gramm-Leach-Bliley Act effectively prohibited the formation of similar uniform thrift holding companies after May 1999, but grandfathered existing uniform thrift holding companies or ones with pending applications. Thus, AIG has been subject to OTS regulation, examination, supervision and reporting requirements.

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www.naic.org

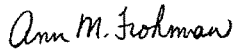
There are **50** risk-bearing insurance entities within the AIG holding company system overseen by the OTS.

Response (c): Of the **5,220** risk-bearing insurance legal entities considered, the remaining **4,301** insurance legal entities are in holding company systems where the "parent" entity of the group is not subject to Federal Reserve Board umbrella regulation or direct state functional regulation.

Attached to this correspondence is an Excel document prepared by the NAIC that provides the names of all of the risk bearing insurance legal entities within each category identified above. Please note that some state laws treat certain information on captive insurance legal entities as confidential; thus, some company information was not provided for those situations. Captives generally insure obligations within a group rather than market directly to the public.

Please let me know if you have any further questions.

Sincerely,



Ann M. Frohman
Nebraska Director of Insurance
Chair of the NAIC Group Solvency Issues (EX)
Working Group

cc: Terrie Allison, House Financial Services Committee Editor
cc: Therese M. Vaughan, Ph.D., CEO, NAIC
cc: Sean Dilweg, Wisconsin Commissioner of Insurance

Attachment

NAIC-Cocode	Name of Risk Bearing Insurance Legal Entity	Group #	Dom	Part of a Holding Company System	Ultimate Parent Is An Insurer
10838	Sunderland Marine Mut Co Ltd		AK	Yes	Yes
16926	Areca Ins Exch		AK	No	No
38687	Alaska Timber Ins Exch		AK	No	No
38733	Alaska Natl Ins Co		AK	Yes	No
40126	Umialik Ins Co		AK	Yes	No
47201	Alaska Vision Serv Inc	1189	AK	Yes	No
10179	ProAssurance Specialty Ins Co	2698	AL	Yes	No
10389	Agent Alliance Ins Co		AL	No	No
10765	Alpha Dental of AL Inc	2479	AL	Yes	No
10780	Pinnacle Cas Assur Co		AL	Yes	No
11004	Alfa Specialty Ins Corp	5	AL	Yes	Yes
11178	Quality Cas Ins Co Inc		AL	No	No
11668	Coastal Ins RRG Inc		AL	Yes	No
12114	National Security Fire & Cas Co	316	AL	Yes	No
12188	Alfa Vision Ins Corp	5	AL	Yes	Yes
12250	CompBenefits of AL Inc	119	AL	Yes	No
12880	DentiCare of AL Inc	19	AL	Yes	No
12974	DaVita VillageHealth Ins of AL Inc	4422	AL	Yes	No
13034	Alabama Life Reins Co Inc		AL	Yes	No
15911	American Mining Ins Co Inc	98	AL	Yes	No
16212	Omega One Ins Co	316	AL	Yes	No
17710	Alabama Municipal Ins Corp		AL	No	No
19135	Alfa Mut Ins Co	5	AL	Yes	Yes
19143	Alfa Mut Fire Ins Co	5	AL	Yes	Yes
19151	Alfa Mut Gen Ins Co	5	AL	Yes	Yes
22330	Alfa Ins Corp	5	AL	Yes	Yes
31178	Mutual Savings Fire Ins Co	215	AL	Yes	No
31186	Baldwin Mut Ins Co		AL	No	No
33391	ProAssurance Ind Co Inc	2698	AL	Yes	No
33677	Attorneys Ins Mut Of AL Inc		AL	No	No
34568	Centennial Cas Co		AL	Yes	No
41300	American Resources Ins Co Inc		AL	Yes	No
41661	Alfa Gen Ins Corp	5	AL	Yes	Yes
47038	United Concordia Dental Corp AL	812	AL	Yes	Yes
47051	First Comm Hlth Plan Inc		AL	Yes	No
51454	Gulf Coast Title Ins Co Inc		AL	Yes	Yes
55433	BCBS of AL	570	AL	Yes	Yes
57800	Most Worshipful Prince Hall Grand Lo		AL	No	No
57827	Independent Order Of Universal Brthd		AL	No	No
57835	Knights Of Peter Claver		AL	No	No
58300	Grand Chapter Order Of E Star		AL	No	No
61468	Booker T Washington Ins Co Inc		AL	Yes	No
65412	Life Ins Co Of AL		AL	No	No
66397	Mutual Savings Life Ins Co	215	AL	Yes	No
66788	National Security Ins Co	316	AL	Yes	No
70157	Universal Life Ins Co		AL	Yes	No
79049	Alfa Life Ins Corp	5	AL	Yes	Yes
79057	Southland Natl Ins Corp	421	AL	Yes	No
81531	United Trust Ins Co	570	AL	Yes	Yes
84255	Peoples Savings Life Ins Co		AL	Yes	No
88218	Jordan Funeral & Ins Co Inc		AL	No	No
88536	Protective Life & Annuity Ins Co	458	AL	Yes	No
95322	Viva Hlth Inc		AL	Yes	No
95781	Healthspring of AL Inc	3477	AL	Yes	No
95784	United Hlthcare of AL Inc	707	AL	Yes	No
10251	American Underwriters Ins Co	3617	AR	Yes	No
11559	American Dental Providers of AR Inc	119	AR	Yes	No
12282	Arkansas Comm Care Inc	3681	AR	Yes	No
12567	Care Improvement Plus S Central Ins	4443	AR	Yes	No
12884	AMC Re Inc	3617	AR	Yes	No
13160	Physicians Hlth Choice of AR Inc	4423	AR	Yes	No
13565	Arkansas Mut Ins Co		AR	No	No
13757	Farm Bureau Mut Ins Co Of AR Inc		AR	No	No
16047	Southern Pioneer Prop & Cas Ins Co		AR	Yes	No
17647	United Home Ins Co		AR	Yes	No
18236	Agents Mut Ins Co		AR	No	No
18252	Town & Country Mut Ins Co		AR	No	No
23736	Direct Natl Ins Co	1213	AR	Yes	No
24319	Darwin Select Ins Co	3239	AR	Yes	No
37613	Farmers Union Mut Ins Co		AR	No	No
38920	American Hlthcare Specialty Ins Co	831	AR	Yes	Yes
44768	Vantapro Specialty Ins Co	3239	AR	Yes	No
47155	Delta Dental Plan of AR Inc		AR	No	No

50031	Aviation Title Ins Co		AR	Yes	No
50725	Arkansas Title Ins Co	340	AR	Yes	No
61883	Central United Life Ins Co	1117	AR	Yes	No
63533	Imerica Life & Hlth Ins Co		AR	Yes	No
70998	Community Bank Life & Hlth Ins Co		AR	Yes	No
73881	American Life & Annuity Co		AR	No	No
74365	Southern Pioneer Life Ins Co	361	AR	Yes	No
74900	Brokers Natl Life Assur Co		AR	Yes	No
76201	American Serv Life Ins Co	451	AR	Yes	Yes
76503	Port O Call Life Ins Co		AR	No	No
79022	Merrill Lynch Life Ins Co	468	AR	Yes	No
83470	Arkansas BCBS	876	AR	Yes	Yes
83798	Memorial Ins Co Of Amer	454	AR	Yes	No
83836	Selected Funeral & Life Ins Co		AR	No	No
83860	American Home Life Ins Co		AR	No	No
83909	Union Life Ins Co	361	AR	Yes	No
83933	Cooperative Life Ins Co		AR	No	No
83941	Cosmopolitan Life Ins Co		AR	No	No
83968	Citizens Fidelity Ins Co		AR	No	No
83976	First Fin Assur Co		AR	No	No
83984	New Found Life Ins Co		AR	No	No
83992	Foundation Life Ins Co Of AR		AR	No	No
84018	Fidelity Standard Life Ins Co		AR	Yes	No
84034	First Guar Ins Co		AR	Yes	No
84042	Higginbotham Burial Ins Co		AR	No	No
84069	Smith Burial & Life Ins Co	654	AR	Yes	No
84077	Southern Fidelity Life Ins Co	654	AR	Yes	No
84107	Griffin Leggett Burial Ins Co		AR	No	No
84115	Jackson Griffin Ins Co		AR	No	No
86118	Arkansas Bankers Life Ins Co		AR	No	No
88820	Ouachita Life Ins Co	361	AR	Yes	No
90840	Capitol Life & Accident Ins Co	361	AR	Yes	No
94358	USAble Life	876	AR	Yes	Yes
95442	Hmo Partners Inc	876	AR	Yes	Yes
95446	United Hlthcare of AR Inc	707	AR	Yes	No
95448	QCA Hlth Plan Inc		AR	Yes	No
98175	Signature Life Ins Co Of Amer		AR	No	No
10125	Elite Transportation RRG Inc		AZ	Yes	No
10137	Astraea RRG Inc		AZ	Yes	No
10160	ABRAZO Advantage Hlth Plan Inc		AZ	Yes	No
10161	Fox Ins Co		AZ	Yes	No
10232	American Assoc Of Othodontists RRG		AZ	Yes	No
10287	PMI Ins Co	1135	AZ	Yes	No
10670	PMI Mortgage Guar Co	1135	AZ	Yes	No
10672	Scottsdale Surplus Lines Ins Co	140	AZ	Yes	Yes
10676	First Guard Ins Co		AZ	Yes	No
10729	Seneca Specialty Ins Co	158	AZ	Yes	No
10738	TM Specialty Ins Co	3098	AZ	Yes	No
10741	Residential Ins Co	1135	AZ	Yes	No
10814	GNY Custom Ins Co	222	AZ	Yes	Yes
11155	Preneed Reins Co of Amer	1211	AZ	Yes	Yes
11163	Avesis Ins Inc		AZ	Yes	No
11226	New Sutliff Warranty Co	3178	AZ	Yes	No
11249	Sutliff Warranty Co	3178	AZ	Yes	No
11598	Applied Medico Legal Solutions RRG		AZ	Yes	No
11710	Allied Professionals Ins Co RRG		AZ	Yes	No
11805	Arizona Automobile Ins Co		AZ	Yes	No
11811	Professional Security Ins Co	413	AZ	Yes	Yes
11815	Transurance RRG Inc		AZ	Yes	No
11845	AquaGuardian Ins Co Inc		AZ	Yes	No
11976	Centurion Medical Liab Protect RRG		AZ	Yes	No
11978	Western Ins RRG Inc		AZ	Yes	No
11999	Midwest Ins Grp Inc RRG		AZ	Yes	No
12068	National Guar Ins Co	4511	AZ	Yes	No
12147	Midwest Provider Ins Co RRG Inc		AZ	Yes	No
12166	Advanced Physicians Ins RRG Inc		AZ	Yes	No
12167	Charitable Serv Providers Recip RRG		AZ	Yes	No
12176	Inverness Ins Co	1331	AZ	Yes	No
12180	California Medical Grp Ins Co RRG		AZ	Yes	No
12183	Orange Cnty Medical Recip Ins RRG		AZ	Yes	No
12209	Restoration RRG Inc		AZ	Yes	No
12217	Canyon Ins Serv Inc	3658	AZ	Yes	No
12279	Scan Hlth Plan AZ		AZ	Yes	No
12294	Southwest Marine & Gen Ins Co	256	AZ	Yes	No
12320	Innovative Physician Solutions RRG		AZ	Yes	No

12439	Charter Reins Co Inc		AZ	Yes	No
12576	Medical Ins Underwriters RRG Inc		AZ	Yes	No
12625	Fort Wayne Medical Surety Co RRG		AZ	Yes	No
12741	SCF Premier Ins Co	4485	AZ	Yes	Yes
12759	GeoVera Security Ins Co	3829	AZ	Yes	No
12917	PMI Reins Co	1135	AZ	Yes	No
12995	PHP RRG Ltd		AZ	Yes	No
12996	Bird Ins Co		AZ	Yes	No
13043	SCF Gen Ins Co	4485	AZ	Yes	Yes
13062	Olympia RRG Inc		AZ	Yes	No
13209	SCF Western Ins Co	4485	AZ	Yes	Yes
13210	SCF Cas Ins Co	4485	AZ	Yes	Yes
13562	Caremore Hlth Plan of AZ Inc	4688	AZ	Yes	No
13581	Trillium Gen Ins Co		AZ	Yes	No
13601	Ecole Ins Co		AZ	Yes	No
13736	Red Rock RRG Inc		AZ	Yes	No
17370	Nautilus Ins Co	98	AZ	Yes	No
18732	PMI Mortgage Assur Co	1135	AZ	Yes	No
19615	American Reliable Ins Co	19	AZ	Yes	No
20400	Proselect Natl Ins Co Inc	1154	AZ	Yes	Yes
20559	General Security Ind Co of AZ	749	AZ	Yes	No
21598	Farmers Ins Co Of AZ	212	AZ	Yes	No
24848	Newport Ins Co	1281	AZ	Yes	No
25445	Ironshore Specialty Ins Co	4509	AZ	Yes	No
27251	PMI Mortgage Ins Co	1135	AZ	Yes	No
28053	Rockhill Ins Co	175	AZ	Yes	Yes
31089	Republic Western Ins Co	574	AZ	Yes	No
32832	Mutual Ins Co Of Az		AZ	No	No
33944	Radian Mortgage Ins Inc	766	AZ	Yes	No
33987	Advanta Ins Co	954	AZ	Yes	No
34002	Trans City Cas Ins Co		AZ	No	No
34037	Hallmark Ins Co	3478	AZ	Yes	No
34045	Dallas Mechanical Ins Co		AZ	Yes	No
35424	Old Republic Security Assur Co	150	AZ	Yes	No
36714	SCF AZ	4485	AZ	Yes	Yes
37150	Western Heritage Ins Co	140	AZ	Yes	Yes
38490	Arizona Home Ins Co	800	AZ	Yes	Yes
40479	Republic Vanguard Ins Co	3489	AZ	Yes	No
43117	American Equity Ins Co	3548	AZ	Yes	No
43915	Rainier Ins Co	3485	AZ	Yes	No
44520	Crum & Forster Specialty Ins Co	158	AZ	Yes	No
47012	Sightcare Inc		AZ	Yes	No
47013	Cigna Dental Hlth Plan of AZ Inc	901	AZ	Yes	No
47708	United Dental Care of AZ Inc	19	AZ	Yes	No
52120	Total Dental Administrators Hlth Pla	3415	AZ	Yes	No
53090	Employers Dental Serv		AZ	Yes	No
53589	BCBS of AZ Inc		AZ	No	No
53597	Arizona Dental Ins Serv Inc	3658	AZ	Yes	No
60008	Rockford Life Ins Co	4254	AZ	Yes	No
60018	Arizona Natl Life Ins Co		AZ	Yes	No
60025	Express Scripts Ins Co		AZ	Yes	No
60032	Better Life & Hlth Ins Co		AZ	Yes	No
60043	Dupage Life Ins Co		AZ	Yes	No
60072	Preferred Care Life Ins Co		AZ	Yes	No
60078	Hallmark Life Ins Co	1295	AZ	Yes	No
60080	National Hlthcare Reins Co		AZ	Yes	No
60118	North Amer Natl Re Ins Co		AZ	Yes	No
60183	S USA Life Ins Co Inc	1347	AZ	Yes	Yes
60188	Superior Vision Ins Inc	229	AZ	Yes	No
60241	First Reins Inc		AZ	Yes	No
60941	SunAmerica Ann & Life Assur Co	12	AZ	Yes	No
62332	Westport Life Ins Co	312	AZ	Yes	No
62421	Heritage Union Life Ins Co		AZ	Yes	No
63169	Somerset Life Ins Co		AZ	Yes	No
63347	National Protective Life Ins Co		AZ	Yes	No
64360	Household Life Ins Co Of AZ	352	AZ	Yes	No
64394	Heritage Life Ins Co	350	AZ	Yes	No
64866	Programmed Life Ins Co		AZ	Yes	No
67253	Old Reliance Ins Co		AZ	Yes	No
68723	New York Life Agents Reins Co		AZ	Yes	No
69256	Sunamerica Life Ins Co	12	AZ	Yes	No
69595	American Classic Reins Co		AZ	Yes	No
71323	Zale Life Ins Co	669	AZ	Yes	No
71390	Admiral Life Ins Co of Amer	4172	AZ	Yes	Yes
71897	Citadel Life & Hlth Ins Co		AZ	Yes	No

71986	Transam Assur Co	896	AZ	Yes	No
72257	First Amtenn Life Ins Co		AZ	Yes	No
72362	Pekin Fin Life Ins Co	153	AZ	Yes	No
72559	Wachovia Life Ins Co	471	AZ	Yes	No
72958	Canyon State Life Ins Co		AZ	No	No
73504	Congress Life Ins Co	4484	AZ	Yes	No
74454	Connecticut Life Ins & Ann Corp		AZ	Yes	No
75396	Mississippi Valley Life Ins Co		AZ	Yes	No
75892	Educators Life Ins Co Of Amer	300	AZ	Yes	No
76007	Old United Life Ins Co	697	AZ	Yes	No
76112	Oxford Life Ins Co	574	AZ	Yes	No
77690	Trans City Life Ins Co		AZ	No	No
78077	Mony Life Ins Co Of Amer	968	AZ	Yes	No
78174	Conseco Hlth Ins Co	233	AZ	Yes	No
78301	Westward Life Ins Co		AZ	Yes	No
78409	Workmens Life Ins Co	273	AZ	Yes	No
78549	Futural Life Ins Co		AZ	Yes	No
78905	Elan Life Ins Co		AZ	Yes	No
79090	Sutliff Life Ins Co	3178	AZ	Yes	No
79227	Pruco Life Ins Co	304	AZ	Yes	No
79782	Electric Coop Life Ins Co		AZ	Yes	No
79995	JRD Life Ins Co		AZ	Yes	No
80055	Advanta Life Ins Co	954	AZ	Yes	No
81353	NYLife Ins Co Of AZ	826	AZ	Yes	Yes
81604	TEB Life Ins Co		AZ	Yes	No
82368	HBI Life Ins Co		AZ	Yes	No
83232	Guarantee Security Life Ins Co AZ	687	AZ	Yes	No
83445	Wellcare Hlth Ins of AZ Inc	1199	AZ	Yes	No
84395	Great Southeastern Life Ins Co		AZ	Yes	No
85324	Key Bank Life Ins Ltd		AZ	Yes	No
85413	Regions Life Ins Co	458	AZ	Yes	No
85502	Tennessee Life Ins Co	629	AZ	Yes	No
85537	Wellington Life Ins Co	965	AZ	Yes	No
85596	Summit Credit Life Ins Co	1281	AZ	Yes	No
85766	United Concordia Ins Co	812	AZ	Yes	Yes
85880	Ciera Investment Life Ins Co		AZ	Yes	No
85944	Investors Growth Life Ins Co		AZ	Yes	No
85960	Citizens Accident & Hlth Ins Co	458	AZ	Yes	No
85995	Suntrust Ins Co		AZ	Yes	No
86240	Censtat Life Assur Co	690	AZ	Yes	Yes
87220	Equitable Agents Reins Co		AZ	No	No
87289	Georgia Peoples Life Ins Co		AZ	Yes	No
87394	Marquette Ind & Life Ins Co		AZ	Yes	No
88226	Modern Life Ins Co Of AZ	361	AZ	Yes	No
88455	Carlisle Life Ins Co		AZ	Yes	No
89071	SEB Trygg Life USA Assur Co Ltd		AZ	Yes	No
89281	Southeast Family Life Ins Co	690	AZ	Yes	Yes
89427	American Labor Life Ins Co		AZ	Yes	No
89518	Value Hlth Reins Inc	965	AZ	Yes	No
89621	Independence One Life Ins Co		AZ	Yes	No
90034	Foothills Life Ins Co		AZ	Yes	No
90735	Yadkin Valley Life Ins Co		AZ	Yes	No
91111	M&T Life Ins Co		AZ	Yes	No
91898	Lifecare Assur Co		AZ	Yes	No
91910	American Savings Life Ins Co		AZ	Yes	No
92150	Huntington Natl Life Ins Co		AZ	Yes	No
92649	American Underwriters Life Ins Co	863	AZ	Yes	No
92886	Beverly Hills Life Ins Co		AZ	Yes	No
93793	Miami Valley Ins Co		AZ	Yes	No
93815	Pacific Century Life Ins Corp		AZ	Yes	No
94633	Bucktail Life Ins Co		AZ	Yes	No
94943	RIHT Life Ins Co	1281	AZ	Yes	No
95125	Cigna Hlthcare of AZ Inc	901	AZ	Yes	No
95206	Health Net of AZ Inc	623	AZ	Yes	No
95224	PREMIER CHOICE DENTAL INC		AZ	Yes	No
95366	Alpha Dental of AZ Inc	2479	AZ	Yes	No
95617	Pacificare Of AZ Inc	707	AZ	Yes	No
95982	Banner Medisun Inc		AZ	Yes	No
96016	United Hlthcare of AZ Inc	707	AZ	Yes	No
97250	Banc Life Ins Corp		AZ	Yes	No
97268	Pacific Life & Ann Co	709	AZ	Yes	No
97446	Reserve Capital Life Ins Co		AZ	Yes	No
97551	Arkansas Life Ins Co	361	AZ	Yes	No
98426	Southwest Equity Life Ins Co	468	AZ	Yes	No
98965	Dallas Automotive Life Ins Co		AZ	Yes	No

N/A	TGG CAPTIVE INSURANCE COMPANY	AZ	Yes	No
N/A	CAST CAPTIVE INSURANCE COMPANY	AZ	Yes	No
N/A	MSIHL CAPTIVE INSURANCE COMPANY	AZ	Yes	No
N/A	PACWEST CAPTIVE INSURANCE COMPANY, INC.	AZ	Yes	No
N/A	AMERICAN PROPERTY & LIABILITY INSURANCE COMPANY	AZ	Yes	No
N/A	SRP CAPTIVE RISK SOLUTIONS, LIMITED	AZ	Yes	No
N/A	AMERICAN PRIDE CAPTIVE INSURANCE COMPANY	AZ	Yes	No
N/A	ENTERPRISE INDEMNITY CAPTIVE INSURANCE COMPANY,	AZ	Yes	No
N/A	RIVERSIDE CAPTIVE INSURANCE COMPANY	AZ	Yes	No
N/A	PACIFIC CAPTIVE INSURANCE COMPANY, INC.	AZ	Yes	No
N/A	PRUDENTIAL ARIZONA REINSURANCE CAPTIVE COMPANY	AZ	Yes	No
N/A	MEMORIAL CAPTIVE INSURANCE COMPANY	AZ	Yes	No
N/A	GLOBAL ONE INSURANCE COMPANY	AZ	Yes	No
N/A	ARIZONA PROFESSIONAL INSURANCE CO.	AZ	Yes	No
N/A	HEALTHCARE CAPTIVE INSURANCE COMPANY	AZ	Yes	No
N/A	CHARTER LIFE CAPTIVE INSURANCE COMPANY, INC.	AZ	Yes	No
N/A	MEDICAL MANAGEMENT CAPTIVE INSURANCE COMPANY	AZ	Yes	No
N/A	SAGUARO NATIONAL CAPTIVE INSURANCE COMPANY	AZ	Yes	No
N/A	INDEPENDENT INNOVATIVE CAPTIVE INSURANCE COMPAN	AZ	Yes	No
N/A	EMBASSY INSURANCE CORPORATION	AZ	Yes	No
N/A	SOCIAL SERVICES PROVIDERS CAPTIVE INSURANCE COMP/	AZ	Yes	No
N/A	PHARMACARE CAPTIVE RE, LTD.	AZ	Yes	No
N/A	MARICOPA CAPTIVE INSURANCE COMPANY, INC.	AZ	Yes	No
N/A	JLH INSURANCE CORPORATION	AZ	Yes	No
N/A	SCOTTSDALE CAPTIVE INSURANCE COMPANY	AZ	Yes	No
N/A	CART CAPTIVE ASSURANCE COMPANY, INC.	AZ	Yes	No
N/A	PARAGON INSURANCE COMPANY	AZ	Yes	No
N/A	FAIRWAY INSURANCE, INC.	AZ	Yes	No
N/A	DESERT PARTNERS CAPTIVE INSURANCE COMPANY	AZ	Yes	No
N/A	HUNTINGTON CAPTIVE INSURANCE COMPANY	AZ	Yes	No
N/A	MOHAVE TRANSPORTATION INSURANCE COMPANY	AZ	Yes	No
N/A	84 INDEMNITY COMPANY	AZ	Yes	No
N/A	DIVERSIFIED INSURANCE COMPANY	AZ	Yes	No
N/A	DB SELECTIVE INSURANCE GROUP, INC.	AZ	Yes	No
N/A	SHERIDAN RE, INC.	AZ	Yes	No
N/A	TAPESTRY INSURANCE CORPORATION	AZ	Yes	No
N/A	SOUTHWEST RISK ASSURANCE COMPANY, INC.	AZ	Yes	No
N/A	HOSPITALITY INSURANCE SOLUTIONS, INC.	AZ	Yes	No
N/A	UNIVERSAL PRUDENTIAL ARIZONA REINSURANCE COMPA	AZ	Yes	No
N/A	QCS INSURANCE COMPANY	AZ	Yes	No
N/A	CLEAR LAKE INSURANCE, INC.	AZ	Yes	No
N/A	ESCOBA INSURANCE COMPANY	AZ	Yes	No
N/A	HOME INTEGRITY INSURANCE COMPANY	AZ	Yes	No
N/A	NORTHWESTERN ARIZONA REGIONAL INSURANCE COMPA	AZ	Yes	No
N/A	CHIP RE INC.	AZ	Yes	No
N/A	AZUL INSURANCE COMPANY LIMITED	AZ	Yes	No
N/A	ASSOCIATED INSURANCE COMPANY FOR EXCESS	AZ	Yes	No
N/A	PROVIDENCE ASSURANCE, INC.	AZ	Yes	No
N/A	IRONWOOD INSURANCE COMPANY	AZ	Yes	No
N/A	PENN-OHIO LIFE INSURANCE COMPANY	AZ	Yes	No
N/A	AMERICAN HONDA INSURANCE CORPORATION	AZ	Yes	No
N/A	ARK DEFENSE, INC.	AZ	Yes	No
N/A	XPRESS ASSURANCE, INC.	AZ	Yes	No
N/A	SOUTHWEST INSURANCE COMPANY, INC.	AZ	Yes	No
N/A	OSPREY INSURANCE COMPANY	AZ	Yes	No
N/A	SBLI RE, INC.	AZ	Yes	No
N/A	DMG INSURANCE COMPANY, INC.	AZ	Yes	No
N/A	PROVIDENT INSURANCE COMPANY OF IDAHO, INC.	AZ	Yes	No
N/A	RISK RESOURCES,LTD.	AZ	Yes	No
N/A	CARE IMPROVEMENT REINSURANCE CORPORATION OF AM	AZ	Yes	No
N/A	CAMBRIDGE ARIZONA INSURANCE COMPANY	AZ	Yes	No
N/A	CST INSURANCE COMPANY	AZ	Yes	No
N/A	CAPTIVA ASSURANCE COMPANY, INC.	AZ	Yes	No
N/A	PCR INSURANCE COMPANY	AZ	Yes	No
N/A	DEVELOPMENT INSURANCE GROUP, INC.	AZ	Yes	No
N/A	APPLE INSURANCE COMPANY, INC.	AZ	Yes	No
N/A	WASHINGTON AND MICHIGAN INSURANCE, INC.	AZ	Yes	No
N/A	OHSU INSURANCE COMPANY	AZ	Yes	No
N/A	CYPRESS INSURANCE COMPANY	AZ	Yes	No
N/A	FORT GATLIN ASSURANCE, INC.	AZ	Yes	No
N/A	VALLEY ASSURANCE COMPANY	AZ	Yes	No
N/A	ROYAL ASSURANCE, INC.	AZ	Yes	No
N/A	BRADSTREET ASSURANCE ASSOCIATES, INC.	AZ	Yes	No
N/A	TRI-VECTA INDEMNITY COMPANY, INC.	AZ	Yes	No
N/A	TENN RE, INC.	AZ	Yes	No

N/A	PRUDENTIAL ARIZONA REINSURANCE III COMPANY		AZ	Yes	No
N/A	PERIMETER INSURANCE COMPANY, INC.		AZ	Yes	No
N/A	BOWTIE LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	FOR LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	MCCARTHY LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	MINNETONKA LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	MOTORSPORT LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	RUDANDA LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	STARVED ROCK LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	ORANGE SECURITY LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	KELLEY LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	DUO LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	BECK LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	NEW BREMEN LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	CARDINAL & GOLD INSURANCE COMPANY		AZ	Yes	No
N/A	KLEIN LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	COMMONWEALTH TRUST CREDIT LIFE INSURANCE COMPA		AZ	Yes	No
N/A	IOWA-MIDWEST INSURANCE COMPANY		AZ	Yes	No
N/A	TRACE LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	REMINGTON LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	ACME LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	AMHERST LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	FIRST CITIZENS/WHITE AND ASSOCIATES INSURANCE COM		AZ	Yes	No
N/A	TRUSTEES LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	AMERISERV LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	HARRIS LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	UNITED MISSOURI INSURANCE COMPANY		AZ	Yes	No
N/A	FUSB REINSURANCE, INC.		AZ	Yes	No
N/A	TIERONE REINSURANCE COMPANY		AZ	Yes	No
N/A	EAST ARKANSAS GEM LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	MOUNTAIN NATIONAL LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	TIPPECANOE LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	HNC REINSURANCE COMPANY		AZ	Yes	No
N/A	COUNTY REINSURANCE COMPANY		AZ	Yes	No
N/A	FIRST PULASKI REINSURANCE COMPANY		AZ	Yes	No
N/A	SPECTRUM LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	F & M REINSURANCE COMPANY		AZ	Yes	No
N/A	FCB REINSURANCE COMPANY		AZ	Yes	No
N/A	COAST LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	GREATER MISSOURI LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	ALLIANCE INTERNATIONAL INSURANCE, INC.		AZ	Yes	No
N/A	CITCO LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	DENNIS LIFE INSURANCE COMPANY		AZ	Yes	No
N/A	EAGLE INSURANCE COMPANY		AZ	Yes	No
N/A	FIRST VOLUNTEER INSURANCE COMPANY		AZ	Yes	No
N/A	FSG REINSURANCE COMPANY		AZ	Yes	No
N/A	HITCHCO REINSURANCE COMPANY		AZ	Yes	No
N/A	ODANA LIFE REINSURANCE COMPANY		AZ	Yes	No
10002	Municipal Mut Ins Co		CA	No	No
10004	Utico Standard Of Amer Cas Co	781	CA	Yes	No
10048	Hyundai Marine & Fire Ins Co Ltd		CA	Yes	Yes
10063	California Cas Comp Ins Co	33	CA	Yes	No
10079	Vintage Ins Co	761	CA	Yes	No
10182	Geovera Specialty Ins Co	3829	CA	Yes	No
10216	American Contractors Ind Co	984	CA	Yes	No
10315	Civic Prop & Cas Co	212	CA	Yes	No
10317	Neighborhood Spirit Prop & Cas Co	212	CA	Yes	No
10318	Exact Prop & Cas Co Inc	212	CA	Yes	No
10352	Scpie Ind Co	831	CA	Yes	Yes
10520	Care W Ins Co		CA	Yes	No
10683	Wawanesa Gen Ins Co	1179	CA	Yes	Yes
10693	Civil Serv Employees Ins Co	323	CA	Yes	No
10779	California Earthquake Authority		CA	No	No
10799	Geovera Ins Co	3829	CA	Yes	No
10830	Business Alliance Ins Co	853	CA	Yes	Yes
10837	San Diego Ins Co	111	CA	Yes	No
10855	Cypress Ins Co	31	CA	Yes	No
10873	Farmers Reins Co	212	CA	Yes	No
10887	Pacific Select Prop Ins Co	3829	CA	Yes	No
10900	Preferred Employers Ins Co	98	CA	Yes	No
10920	Alliance United Ins Co		CA	Yes	No
10935	Western Underwriters Ins Co		CA	Yes	No
10939	Safeway Direct Ins Co	257	CA	Yes	No
10970	Response Ind Co Of CA	215	CA	Yes	No
10997	Western Select Ins Co	853	CA	Yes	Yes

11005	Homesite Ins Co Of CA	501	CA	Yes	No
11048	Pacific Prop & Cas Co	408	CA	Yes	Yes
11099	First American Home Buyers Pro Corp	70	CA	Yes	No
11512	Employers Compensation Ins Co	3363	CA	Yes	No
11555	Employers Direct Ins Co	501	CA	Yes	No
11594	Red Viking Ins Co		CA	Yes	No
11908	Mercury Cas Co	660	CA	Yes	No
12177	Compwest Ins Co	572	CA	Yes	Yes
12589	Loya Cas Ins Co	3702	CA	Yes	No
12832	Personal Express Ins Co	9	CA	Yes	No
12878	Sterling Cas Ins Co		CA	Yes	No
12890	Eagle W Ins Co	802	CA	Yes	No
12963	21st Century Ins Co	212	CA	Yes	No
13127	Nations Ins Co		CA	Yes	No
13161	Commerce W Ins Co	816	CA	Yes	No
13250	Workmens Auto Ins Co	273	CA	Yes	No
13269	Zenith Ins Co	336	CA	Yes	No
13544	California Capital Ins Co	802	CA	Yes	No
13625	Western Mut Ins Co	800	CA	Yes	Yes
14010	Crusader Ins Co		CA	Yes	No
14133	Valley Ins Co	215	CA	Yes	No
15539	California State Auto Assn Inter Ins	1278	CA	Yes	Yes
15598	Interins Exch Of The Automobile Club	1318	CA	Yes	Yes
15768	Merced Mut Ins Co		CA	No	No
15776	Residence Mut Ins Co	800	CA	Yes	Yes
18031	Topa Ins Co	161	CA	Yes	No
18864	Fairmont Ins Co	158	CA	Yes	No
18929	AIM Ins Co		CA	No	No
18953	CSE Safeguard Ins Co	323	CA	Yes	No
19269	Danielson Natl Ins Co	930	CA	Yes	No
19285	Danielson Ins Co	930	CA	Yes	No
19852	Financial Ind Co	215	CA	Yes	No
20117	California Cas Ind Exch	33	CA	Yes	No
20125	California Cas Ins Co	33	CA	Yes	No
21652	Farmers Ins Exch	212	CA	Yes	No
21660	Fire Ins Exch	212	CA	Yes	No
21687	Mid Century Ins Co	212	CA	Yes	No
21709	Truck Ins Exch	212	CA	Yes	No
21865	Associated Ind Corp	761	CA	Yes	No
21873	Firemans Fund Ins Co	761	CA	Yes	No
21911	San Francisco Reins Co	761	CA	Yes	No
22179	Republic Ind Co Of Amer	84	CA	Yes	No
22756	Horace Mann Prop & Cas Ins Co	300	CA	Yes	No
22985	Sequoia Ins Co	9	CA	Yes	No
23540	Monterey Ins Co	802	CA	Yes	No
23671	National Amer Ins Co of CA	930	CA	Yes	No
23930	Pacific Natl Ins Co	1116	CA	Yes	No
24384	Fairmont Specialty Ins Co	158	CA	Yes	No
24635	Westward Ins Co	922	CA	Yes	No
24813	Balboa Ins Co	1281	CA	Yes	No
24821	Meritplan Ins Co	1281	CA	Yes	No
25089	Coast Natl Ins Co	212	CA	Yes	No
25180	Fidelity Natl Ins Co	670	CA	Yes	No
25496	TIG Ind Co	158	CA	Yes	No
25518	Fairmont Premier Ins Co	158	CA	Yes	No
25534	TIG Ins Co	158	CA	Yes	No
25550	Indemnity Co Of CA	75	CA	Yes	No
26905	Century Natl Ins Co		CA	Yes	No
27464	California Cas & Fire Ins Co	33	CA	Yes	No
27480	California Mut Ins Co		CA	No	No
27502	Western Gen Ins Co		CA	Yes	No
27553	Mercury Ins Co	660	CA	Yes	No
27847	Insurance Co Of The West	922	CA	Yes	No
30120	Znat Ins Co	336	CA	Yes	No
30210	Esurance Prop & Cas Ins Co	1129	CA	Yes	No
31046	California Gen Underwriters Ins Co	660	CA	Yes	No
31453	Financial Pacific Ins Co	1114	CA	Yes	No
31526	Wawanesa Mut Ins Co Us Branch	1179	CA	Yes	Yes
32107	Sutter Ins Co		CA	Yes	No
32280	Commercial Cas Ins Co	31	CA	Yes	No
32433	Medical Ins Exch Of CA	608	CA	Yes	Yes
33200	Norcal Mut Ins Co	1282	CA	Yes	Yes
34495	Doctors Co An Interins Exch	831	CA	Yes	Yes
34525	First Amer Specilaty Ins Co	70	CA	Yes	No
35076	State Compensation Ins Fund		CA	No	No

35300	Allianz Global Risks US Ins Co	761	CA	Yes	No
35637	Landmark Ins Co	12	CA	Yes	No
36340	Camico Mut Ins Co		CA	No	No
36404	21st Century Cas Co	212	CA	Yes	No
36412	Claremont Liab Ins Co	608	CA	Yes	Yes
36420	Allianz Underwriters Ins Co	761	CA	Yes	No
36633	Premier Alliance Ins Co		CA	No	No
36706	Lawyers Mut Ins Co		CA	No	No
36790	Springfield Ins Co Inc		CA	Yes	No
37710	First Amer Prop & Cas Ins Co	70	CA	Yes	No
37850	Pacific Specialty Ins Co	2898	CA	Yes	No
38342	California Automobile Ins Co	660	CA	Yes	No
38865	California Ins Co	31	CA	Yes	No
39527	Heritage Ind Co	471	CA	Yes	No
39861	Golden Bear Ins Co		CA	No	No
40010	Anchor Gen Ins Co	4256	CA	Yes	No
40029	Explorer Ins Co	922	CA	Yes	No
40550	Pacific Pioneer Ins Co		CA	Yes	No
40800	American Sterling Ins Co		CA	No	No
40975	Dentists Ins Co		CA	Yes	No
42242	Citation Ins Co		CA	Yes	No
42269	Majestic Ins Co		CA	Yes	No
42285	Veterinary Pet Ins Co	140	CA	Yes	Yes
43753	Republic Ind Co of CA	84	CA	Yes	No
43761	American Intl Ins Co Of CA	212	CA	Yes	No
47732	Blue Shield of CA	2798	CA	Yes	Yes
50026	Commerce Title Ins Co		CA	Yes	No
50041	United Capital Title Ins Co	670	CA	Yes	No
50050	Westcor Land Title Ins Co		CA	No	No
50067	Ticor Title Ins Co	670	CA	Yes	No
50130	North Amer Title Ins Co		CA	No	No
50814	First Amer Title Ins Co	70	CA	Yes	No
50849	TransUnion Title Ins Co	3889	CA	Yes	No
50857	Security Union Title Ins Co	670	CA	Yes	No
51586	Fidelity Natl Title Ins Co	670	CA	Yes	No
51624	United Gen Title Ins Co	70	CA	Yes	No
52031	UDC DENTAL CA INC DBA UNITED DENTAL	19	CA	Yes	No
57940	Portuguese Fraternal Society of Amer		CA	No	No
57967	Luso Amer Life Ins Society		CA	No	No
60053	Kaiser Permanente Ins Co	601	CA	Yes	No
60237	Premier Access Ins Co		CA	Yes	No
60256	Automobile Club Of Southern CA Ins	1318	CA	Yes	Yes
61182	Aurora Natl Life Assur Co		CA	Yes	No
61557	Blue Shield of CA Life & Hlth Ins Co	2798	CA	Yes	No
62154	Fremont Life Ins Co	790	CA	Yes	No
62825	Anthem Blue Cross Life & Hlth Ins Co	671	CA	Yes	No
63924	Golden State Mut Life Ins Co		CA	No	No
66141	Health Net Life Ins Co	623	CA	Yes	No
67423	UBS Life Ins Co USA		CA	Yes	No
68160	Balboa Life Ins Co	1281	CA	Yes	No
69566	Trans World Assur Co	896	CA	Yes	No
71331	Careamerica Life Ins Co	2798	CA	Yes	No
71420	Sierra Hlth & Life Ins Co Inc	707	CA	Yes	No
73130	All Savers Life Ins Co of CA	707	CA	Yes	No
79014	Safehealth Life Ins Co	241	CA	Yes	No
92444	Doctors Life Ins Co	831	CA	Yes	Yes
95379	Great W Hlthcare of CA Inc	769	CA	Yes	No
95789	United Concordia Dental Plans CA Inc	812	CA	Yes	Yes
10865	N A D A Ind Inc		CO	Yes	No
11011	Rocky Mountain Hospital & Medical	671	CO	Yes	No
11175	Cigna Dental Hlth of CO Inc	901	CO	Yes	No
11189	Pacificare Dental of CO Inc	707	CO	Yes	No
11860	Copic Ins Co		CO	Yes	No
12670	Pioneer Gen Ins Co	984	CO	Yes	No
13641	Colorado Farm Bureau Mut Ins Co		CO	Yes	No
16217	National Farmers Union Prop & Cas	796	CO	Yes	No
19526	Texas Gen Ind Co	248	CO	Yes	Yes
21776	United Security Ins Co	796	CO	Yes	No
22250	Pathfinder Ins Co		CO	Yes	No
23752	Quanta Ind Co	3496	CO	Yes	No
30759	Farmers Morgan Cnty Protective Assn		CO	No	No
30775	Producers Protective Assoc		CO	No	No
30805	Farm Credit System Assn Captive Ins		CO	No	No
33340	Wescap Ins Co		CO	Yes	No
35904	Health Care Ind Inc		CO	Yes	No

35939	Continental Divide Ins Co	31	CO	Yes	No
40940	Western Pacific Mut Ins Co RRG		CO	Yes	No
41050	Underwriter For The Professions Ins	831	CO	Yes	Yes
41190	Pinnacol Assur		CO	No	No
44016	National Home Ins Co RRG	2378	CO	Yes	No
47004	Rocky Mountain Hlthcare Options Inc	1184	CO	Yes	Yes
50002	Land Title Ins Corp		CO	Yes	No
52032	United Dental Care of CO Inc	19	CO	Yes	No
55875	Colorado Dental Serv Inc		CO	Yes	No
56480	Wsa Fraternal Life		CO	No	No
56499	Woodmen World Assur Life Assn		CO	No	No
66850	National Western Life Ins Co		CO	Yes	No
68322	Great W Life & Ann Ins Co	769	CO	Yes	No
68713	Security Life Of Denver Ins Co	229	CO	Yes	No
71463	CICA Life Ins Co of Amer	612	CO	Yes	No
84506	Pacificare Life Assur Co	707	CO	Yes	No
84786	Colorado Bankers Life Ins Co	917	CO	Yes	No
93580	M Life Ins Co		CO	Yes	No
95090	United Hlthcare of CO Inc	707	CO	Yes	No
95412	Cigna Hlthcare Centennial State Inc	901	CO	Yes	No
95434	Pacificare Of CO Inc	707	CO	Yes	No
95473	Hmo CO Inc	671	CO	Yes	No
95482	Rocky Mountain Hmo Inc	1184	CO	Yes	Yes
95604	Cigna Hlthcare of CO Inc	901	CO	Yes	No
95669	Kaiser Found Hlth Plan of CO	601	CO	Yes	No
95733	Colorado Access		CO	No	No
95750	Denver Hlth Medical Plan Inc		CO	Yes	No
95774	Colorado Choice Hlth Plan		CO	No	No
N/A	Colorado Health Partnerships, LLC		CO	No	No
N/A	Foothills Behavioral Health Partners, LLC		CO	No	No
N/A	Foothills Behavioral Health, LLC		CO	No	No
N/A	Northeast Behavioral Health, LLC		CO	No	No
N/A	Northeast Behaviroal Health Partnerships, LLC		CO	No	No
N/A	Summit Insurance Company of America		CO	Yes	No
N/A	Westmerica Insurance Company		CO	Yes	No
10046	Pacific Ins Co Ltd	91	CT	Yes	No
10062	Covenant Ins Co	586	CT	Yes	Yes
10344	Rvi Amer Ins Co	4071	CT	Yes	No
10785	Travelers Auto Ins Co of NJ	3548	CT	Yes	No
10819	American Equity Specialty Ins Co	3548	CT	Yes	No
10829	Harbor Point Reins US Inc		CT	Yes	No
11000	Sentinel Ins Co Ltd	91	CT	Yes	No
11171	CBIA Comp Serv Inc		CT	No	No
11209	Connecticare Ins Co Inc	1127	CT	Yes	No
11452	Hartford Steam Boil Inspec & Ins Co	361	CT	Yes	No
12809	Senior Whole Hlth of CT Inc		CT	Yes	No
13174	Aetna Better Hlth Inc	1	CT	Yes	No
13178	Americhoice of CT Inc	707	CT	Yes	No
13733	Cigna Arbor Life Ins Co	901	CT	Yes	No
14532	Middlesex Mut Assur Co	50	CT	Yes	No
14826	New London Cnty Mut Ins Co	787	CT	Yes	Yes
14923	Patrons Mut Ins Co Of Ct	175	CT	Yes	Yes
15610	AXIS Specialty Ins Co	3416	CT	Yes	No
15890	Connecticut Medical Ins Co		CT	No	No
17221	Homesite Ins Co	501	CT	Yes	No
19038	Travelers Cas & Surety Co	3548	CT	Yes	No
19046	Travelers Cas Ins Co Of Amer	3548	CT	Yes	No
19062	Automobile Ins Co Of Hartford CT	3548	CT	Yes	No
19070	Standard Fire Ins Co	3548	CT	Yes	No
19682	Hartford Fire In Co	91	CT	Yes	No
20052	National Liab & Fire Ins Co	31	CT	Yes	No
20613	Sparta Ins Co		CT	Yes	No
21822	First State Ins Co	91	CT	Yes	No
21830	New England Ins Co	91	CT	Yes	No
22357	Hartford Accident & Ind Co	91	CT	Yes	No
23132	RVI Natl Ins Co	4071	CT	Yes	No
23680	Odyssey Amer Reins Co	158	CT	Yes	No
25615	Charter Oak Fire Ins Co	3548	CT	Yes	No
25623	Phoenix Ins Co	3548	CT	Yes	No
25658	Travelers Ind Co	3548	CT	Yes	No
25666	Travelers Ind Co Of Amer	3548	CT	Yes	No
25674	Travelers Prop Cas Co Of Amer	3548	CT	Yes	No
25682	Travelers Ind Co Of CT	3548	CT	Yes	No
25887	United States Fidelity & Guar Co	3548	CT	Yes	No
26050	Response Worldwide Ins Co	215	CT	Yes	No

27120	Trumbull Ins Co	91	CT	Yes	No
27998	Travelers Home & Marine Ins Co	3548	CT	Yes	No
28188	Travco Ins Co	3548	CT	Yes	No
29696	Travelers Excess & Surplus Lines Co	3548	CT	Yes	No
29807	PXRE Reins Co		CT	Yes	No
29890	Hartford Steam Boil Inspec Ins Co CT	361	CT	Yes	No
29930	First Trenton Ind Co	3548	CT	Yes	No
30104	Hartford Underwriters Ins Co	91	CT	Yes	No
31194	Travelers Cas & Surety Co Of Amer	3548	CT	Yes	No
32085	Litchfield Mut Fire Ins Co	175	CT	Yes	Yes
33197	Cologne Reins Co Of Amer	31	CT	Yes	No
34894	Trenwick Amer Reins Corp	1314	CT	Yes	No
36137	Travelers Commercial Ins Co	3548	CT	Yes	No
36145	Travelers Personal Security Ins Co	3548	CT	Yes	No
36153	Aetna Ins Co of CT	1	CT	Yes	No
36161	Travelers Prop Cas Ins Co	3548	CT	Yes	No
36170	Travelers Cas Co Of CT	3548	CT	Yes	No
37354	Thames Ins Co Inc	787	CT	Yes	Yes
37362	General Star Ind Co	31	CT	Yes	No
37540	Beazley Ins Co Inc		CT	Yes	No
38130	Travelers Personal Ins Co	3548	CT	Yes	No
38261	Hartford Ins Co Of The Southeast	91	CT	Yes	No
38962	Genesis Ins Co	31	CT	Yes	No
39136	Finial Reins Co	31	CT	Yes	No
39608	Nutmeg Ins Co	91	CT	Yes	No
39616	Vision Serv Plan Ins Co	1189	CT	Yes	No
40282	Travelers Commercial Cas Co	3548	CT	Yes	No
41483	Farmington Cas Co	3548	CT	Yes	No
41629	New England Reins Corp	91	CT	Yes	No
42811	Gulf Underwriters Ins Co	3548	CT	Yes	No
44784	Fairfield Ins Co	31	CT	Yes	No
44792	Executive Risk Speciality Ins Co	38	CT	Yes	No
51268	Connecticut Attorneys Title Ins Co	4255	CT	Yes	No
58033	Knights Of Columbus		CT	No	No
60054	Aetna Life Ins Co	1	CT	Yes	No
60217	Anthem Hlth Plans Inc	671	CT	Yes	No
60348	Ace Life Ins Co	626	CT	Yes	No
62308	Connecticut Gen Life Ins Co	901	CT	Yes	No
68632	VantisLife Ins Co	4668	CT	Yes	Yes
70416	MML Bay State Life Ins Co	435	CT	Yes	Yes
70815	Hartford Life & Accident Ins Co	91	CT	Yes	No
71153	Hartford Life & Ann Ins Co	91	CT	Yes	No
78700	Aetna Hlth & Life Ins Co	1	CT	Yes	No
79413	UnitedHealthcare Ins Co	707	CT	Yes	No
80926	Sun Life & Hlth Ins Co	549	CT	Yes	No
81213	American Maturity Life Ins Co	91	CT	Yes	No
82627	Swiss Re Life & Hlth Amer Inc	181	CT	Yes	No
86258	General Re Life Corp	31	CT	Yes	No
86509	Ing Life Ins & Ann Co	229	CT	Yes	No
86630	Prudential Ann Life Assur Corp	304	CT	Yes	No
87726	Metlife Ins Co of CT	241	CT	Yes	No
88072	Hartford Life Ins Co	91	CT	Yes	No
91785	American Phoenix Life & Reassur Co	403	CT	Yes	No
93432	CM Life Ins Co	435	CT	Yes	Yes
93505	Hartford Intl Life Reassur Corp	91	CT	Yes	No
93548	PHL Variable Ins Co	403	CT	Yes	No
93629	Prudential Retirement Ins & Ann Co	304	CT	Yes	No
93734	Phoenix Life & Ann Co	403	CT	Yes	No
95310	WellCare of CT Inc	1199	CT	Yes	No
95660	Cigna Hlthcare of CT Inc	901	CT	Yes	No
95675	Connecticare Inc	1127	CT	Yes	No
95935	Aetna Hlth Inc CT Corp	1	CT	Yes	No
95968	Health Net Of CT Inc	707	CT	Yes	No
96798	Oxford Hlth Plans CT Inc	707	CT	Yes	No
97764	Idealife Ins Co	31	CT	Yes	No
10183	Equitable Liab Ins Co	3385	DC	Yes	No
10692	Columbia Federal Ins Co		DC	No	No
12276	Columbia Capital Life Reins Co	3891	DC	Yes	No
13032	Unison Hlth Plan of the Capital Area	707	DC	Yes	No
13124	Companion Specialty Ins Co	661	DC	Yes	Yes
14699	First WA Ins Co Inc	3385	DC	Yes	No
41149	ProAssurance Natl Capital Ins Co	2698	DC	Yes	No
53007	Group Hospitalization & Med Srvcs	380	DC	Yes	Yes
60038	Acacia Life Ins Co	943	DC	Yes	No
95748	DC Chartered Hlth Plan Inc		DC	No	No

95787	Health Right Inc		DC	Yes	No
96202	CareFirst BlueChoice Inc	380	DC	Yes	Yes
10019	Clearwater Select Ins Co	158	DE	Yes	No
10044	Newstead Ins Co	1331	DE	Yes	No
10051	Lyndon Southern Ins Co	17	DE	Yes	No
10120	Everest Natl Ins Co	1120	DE	Yes	No
10227	Munich Reins Amer Inc	361	DE	Yes	No
10391	American Centennial Ins Co	31	DE	Yes	No
10641	Endurance Amer Ins Co	3786	DE	Yes	No
10784	Maxum Cas Ins Co	3589	DE	Yes	No
10786	Princeton Excess & Surplus Lines Ins	361	DE	Yes	No
10788	Wilmington Ins Co		DE	Yes	No
10833	Gemini Ins Co	98	DE	Yes	No
10851	Everest Ind Ins Co	1120	DE	Yes	No
10932	Chartis Select Ins Co	12	DE	Yes	No
10975	Amerihealth Cas Ins Co	936	DE	Yes	No
10980	Risk Mgmt Ind Inc	1303	DE	Yes	No
11132	Delta Dental of DE Inc	2479	DE	Yes	No
11551	Endurance Reins Corp of Amer	3786	DE	Yes	No
11583	American Life Ins Co	12	DE	Yes	No
11819	Manhattan Re Ins Co		DE	Yes	No
11835	Paris Re Amer Ins Co		DE	Yes	No
12537	United Specialty Ins Co	93	DE	Yes	No
12554	MAKE Transportation Ins Inc RRG		DE	No	No
12630	NMHC Grp Solutions Ins Inc		DE	No	No
12639	Delaware Physicians Care Medicare In	1	DE	Yes	No
12784	Bravo Hlth Ins Co Inc	3387	DE	Yes	No
12833	AIX Specialty Ins Co	88	DE	Yes	No
12936	Naxos Ins Co	4381	DE	Yes	No
12938	Federal Motor Carriers RRG Inc		DE	No	No
12961	Omega US Ins Inc		DE	Yes	No
13011	Consolidated Workers RRG Inc		DE	No	No
13025	Five Pointe Professional Liab Ins Co		DE	Yes	No
13037	The Cincinnati Specialty Underwriter	244	DE	Yes	No
13185	Carrier Solutions RRG Inc		DE	No	No
13192	Claria Life & Hlth Ins Co		DE	Yes	No
13551	Valiant Specialty Ins Co	4662	DE	Yes	No
13569	River Lake Ins Co VI	4011	DE	Yes	No
13569	River Lake Ins Co VI	4011	DE	Yes	No
13722	Knightbrook Ins Co	1316	DE	Yes	No
15989	Catlin Specialty Ins Co	4574	DE	Yes	No
16187	AXA Re Prop & Cas Ins Co	968	DE	Yes	No
16624	Darwin Natl Assur Co	3239	DE	Yes	No
19437	Lexington Ins Co	12	DE	Yes	No
19489	Allied World Assur Co US Inc	3239	DE	Yes	No
19607	XL Select Ins Co	1285	DE	Yes	No
19720	American Alt Ins Corp	361	DE	Yes	No
21113	United States Fire Ins Co	158	DE	Yes	No
21784	Firemens Ins Co Of Washington DC	98	DE	Yes	No
22039	General Reins Corp	31	DE	Yes	No
22047	North Star Reins Corp	31	DE	Yes	No
22322	Greenwich Ins Co	1285	DE	Yes	No
23612	Midwest Employers Cas Co	98	DE	Yes	No
24554	XL Ins Amer Inc	1285	DE	Yes	No
24678	Arrowood Ind Co	553	DE	Yes	No
24856	Admiral Ins Co	98	DE	Yes	No
25011	Wesco Ins Co	2538	DE	Yes	No
25054	Hudson Ins Co	158	DE	Yes	No
25070	Clearwater Ins Co	158	DE	Yes	No
26387	Steadfast Ins Co	212	DE	Yes	No
26581	Independence Amer Ins Co	450	DE	Yes	No
26611	Valiant Ins Co	4662	DE	Yes	No
26743	Maxum Ind Co	3589	DE	Yes	No
26921	Everest Reins Co	1120	DE	Yes	No
27596	LR Ins Inc		DE	Yes	No
27979	International Underwriters Ins Co	506	DE	Yes	No
28657	HSBC Ins Co of DE	352	DE	Yes	No
29122	De State Grange Mut Fire Ins Co		DE	No	No
29580	Berkley Regional Ins Co	98	DE	Yes	No
30481	St Paul Surplus Lines Ins Co	3548	DE	Yes	No
31232	Work First Cas Co		DE	Yes	No
31295	Berkley Regional Specialty Ins Co	98	DE	Yes	No
31348	Crum & Forster Ind Co	158	DE	Yes	No
32603	Berkley Ins Co	98	DE	Yes	No
33189	Max Specialty Ins Co	4636	DE	Yes	No

34215	Nuclear Electric Ins Ltd		DE	No	No
34649	Centre Ins Co	212	DE	Yes	No
34835	National Reins Corp	31	DE	Yes	No
35092	American Special Risk Ins Co	821	DE	Yes	No
35181	Executive Risk Ind Inc	38	DE	Yes	No
35351	American Empire Surplus Lines Ins Co	84	DE	Yes	No
35408	Delos Ins Co	4381	DE	Yes	No
35947	MT Mckinley Ins Co	1120	DE	Yes	No
36552	Coliseum Reins Co	968	DE	Yes	No
37532	Great Amer E&S Ins Co	84	DE	Yes	No
37583	Sagicor Allnation Ins Co	3766	DE	Yes	No
37885	XL Specialty Ins Co	1285	DE	Yes	No
37893	Ullico Cas Co	781	DE	Yes	No
38385	Commercial Guar Ins Co	3548	DE	Yes	No
38989	Chubb Custom Ins Co	38	DE	Yes	No
39020	Essex Ins Co	785	DE	Yes	No
39152	American Hlthcare Ind Co	831	DE	Yes	Yes
40045	Starnet Ins Co	98	DE	Yes	No
40789	American Bus & Personal Ins Mut Inc	150	DE	Yes	No
41718	Endurance Amer Specialty Ins Co	3786	DE	Yes	No
41807	Arrowood Surplus Lines Ins Co	553	DE	Yes	No
41858	Great Amer Fidelity Ins Co	84	DE	Yes	No
42439	Toa Re Ins Co Of Amer		DE	Yes	Yes
42978	American Security Ins Co	19	DE	Yes	No
42986	Standard Guar Ins Co	19	DE	Yes	No
43125	Delaware Professional Ins Co RRG		DE	No	No
43630	Endurance Risk Solutions Assur Co	3786	DE	Yes	No
44148	Architects & Engineers Ins Co RRG		DE	No	No
44245	American Intl Ins Co Of DE	212	DE	Yes	No
44318	Admiral Ind Co	98	DE	Yes	No
44776	Torus Specialty Ins Co		DE	Yes	No
52039	Christiana Care Hlth Plans Inc		DE	No	No
53287	BCBSD Inc		DE	No	No
56243	Delaware Vol Firemens & Ladies Aux		DE	No	No
56251	Mutual Beneficial Assn Inc		DE	No	No
60003	Park Avenue Life Ins Co	429	DE	Yes	Yes
60252	Horizon Hlthcare Ins Co of DE	1202	DE	Yes	Yes
60254	Independence Ins Inc	936	DE	Yes	No
60690	American Life Ins Co	12	DE	Yes	No
61050	MetLife Investors USA Ins Co	241	DE	Yes	No
62634	Delaware Amer Life Ins Co	12	DE	Yes	No
64939	Investors Ins Corp	749	DE	Yes	No
66842	American Gen Life Ins Co of DE	12	DE	Yes	No
68365	AXA Corp Solutions Life Reins Co	968	DE	Yes	No
70025	Genworth Life Ins Co	4011	DE	Yes	No
73474	Dentegra Ins Co	2479	DE	Yes	No
78778	Guardian Ins & Ann Co Inc	429	DE	Yes	Yes
79065	Sun Life Assur Co Of Canada US	549	DE	Yes	No
80586	Scor Global Life Reinsurance Co of America	749	DE	Yes	No
81396	Delta Dental Ins Co	2479	DE	Yes	No
81973	Coventry Hlth & Life Ins Co	1137	DE	Yes	No
85561	Perico Life Ins Co	984	DE	Yes	No
87572	Scottish Re Us Inc	3506	DE	Yes	Yes
89007	Household Life Ins Co Of DE	352	DE	Yes	No
90670	Scottish Re Life Corp	3506	DE	Yes	Yes
90859	Cigna Worldwide Ins Co	901	DE	Yes	No
91596	New York Life Ins & Ann Corp	826	DE	Yes	Yes
92452	Mellon Life Ins Co		DE	Yes	No
93262	Penn Ins & Ann Co	850	DE	Yes	Yes
94439	American Creditors Life Ins Co		DE	No	No
95245	Aema Hlth Inc DE Corp	1	DE	Yes	No
95380	Cigna Dental Hlth of DE Inc	901	DE	Yes	No
95544	Cigna Hlthcare of DE Inc	901	DE	Yes	No
95790	Horizon Hlthcare of DE Inc	1202	DE	Yes	Yes
95794	Healthcare DE Inc	936	DE	Yes	No
96460	Coventry Hlth Care of DE Inc	1137	DE	Yes	No
97136	Metropolitan Tower Life Ins Co	241	DE	Yes	No
97292	Magellan Life Ins Co	1260	DE	Yes	No
10064	CITIZENS PROPERTY INSURANCE CORPORATION		FL	No	No
10111	AMERICAN BANKERS INSURANCE COMPANY OF FL(	19	FL	Yes	No
10117	SECURITY FIRST INSURANCE COMPANY		FL	Yes	No
10119	Freedom Health, Inc.		FL	Yes	No
10122	HealthSun Health Plans, Inc.		FL	No	No
10126	Humana Advantagecare Plan, Inc. F/K/A Metcare Health Plans, Inc.		FL	Yes	No
10132	FLORIDA PENINSULA INSURANCE COMPANY		FL	Yes	No

10136	SOUTHERN FIDELITY INSURANCE COMPANY		FL	Yes	No
10149	FIRST HOME INSURANCE COMPANY		FL	Yes	No
10151	SOUTHERN EAGLE INSURANCE COMPANY		FL	Yes	No
10155	Wellcare Prescription Insurance, Inc.	1199	FL	Yes	No
10168	SUPERIOR GUARANTY INSURANCE COMPANY	407	FL	Yes	No
10178	FCCI INSURANCE COMPANY	474	FL	Yes	No
10186	FIDELITY FIRE & CASUALTY COMPANY		FL	Yes	No
10192	PROGRESSIVE SELECT INSURANCE COMPANY	155	FL	Yes	No
10193	PROGRESSIVE EXPRESS INSURANCE COMPANY	155	FL	Yes	No
10203	ARGUS FIRE & CASUALTY INSURANCE COMPANY	1235	FL	Yes	No
10335	BRIDGEFIELD CASUALTY INSURANCE COMPANY	111	FL	Yes	No
10346	EMPLOYERS PREFERRED INSURANCE COMPANY	3363	FL	Yes	No
10385	FFVA MUTUAL INSURANCE COMPANY		FL	Yes	No
10647	FIRST FLORIDIAN AUTO AND HOME INSURANCE CO!	3548	FL	Yes	No
10663	FLORIDA SELECT INSURANCE COMPANY	958	FL	Yes	No
10688	FLORIDA FAMILY INSURANCE COMPANY	4674	FL	Yes	No
10699	FLORIDA HOSPITALITY MUTUAL INSURANCE COMP.		FL	Yes	Yes
10700	FLORIDA RETAIL FEDERATION SELF INSURERS FUN!		FL	Yes	No
10701	BRIDGEFIELD EMPLOYERS INSURANCE COMPANY	111	FL	Yes	No
10739	STATE FARM FLORIDA INSURANCE COMPANY	176	FL	Yes	Yes
10771	Summit Health Plan, Inc.		FL	Yes	No
10775	Physicians United Plan, Inc.		FL	Yes	No
10790	AMERICAN VEHICLE INSURANCE COMPANY	2879	FL	Yes	No
10834	COMP OPTIONS INSURANCE COMPANY, INC.	536	FL	Yes	Yes
10860	SUNSHINE STATE INSURANCE COMPANY		FL	Yes	No
10861	UNIVERSAL PROPERTY & CASUALTY INSURANCE C(	4663	FL	Yes	No
10872	AMERICAN STRATEGIC INSURANCE CORP.	1344	FL	Yes	No
10897	FIRST PROTECTIVE INSURANCE COMPANY		FL	Yes	No
10908	CAPITOL PREFERRED INSURANCE COMPANY, INC.		FL	Yes	No
10953	CYPRESS PROPERTY & CASUALTY INSURANCE COM	3456	FL	Yes	No
10955	LIBERTY AMERICAN INSURANCE COMPANY	677	FL	Yes	No
10962	NEW AMERICA INSURANCE COMPANY		FL	No	No
10969	UNITED PROPERTY & CASUALTY INSURANCE COMP		FL	Yes	No
11027	TOWER HILL PRIME INSURANCE COMPANY	3484	FL	Yes	Yes
11072	ACA HOME INSURANCE CORP.	4575	FL	Yes	No
11075	LION INSURANCE COMPANY		FL	Yes	No
11122	America's Health Choice Medical Plans, Inc.*		FL	No	No
11156	HOMESITE INSURANCE COMPANY OF FLORIDA	501	FL	Yes	No
11176	Preferred Care Partners, Inc.		FL	Yes	No
11201	MERCURY INDEMNITY COMPANY OF AMERICA	660	FL	Yes	No
11202	MERCURY INSURANCE COMPANY OF FLORIDA	660	FL	Yes	No
11398	GUARANTEE INSURANCE COMPANY	3493	FL	Yes	Yes
11519	Quality Health Plans, Inc.		FL	Yes	No
11532	Healthspring of Florida, Inc. (F/K/A Leon Medical Centers Health Pla		FL	Yes	No
11574	Universal Health Care, Inc.		FL	Yes	No
11588	PHYSICIANS INSURANCE COMPANY		FL	Yes	No
11600	FRANK WINSTON CRUM INSURANCE, INC.		FL	No	No
11697	BUSINESSFIRST INSURANCE COMPANY		FL	Yes	No
11809	PONCE DE LEON LTC RISK RETENTION GROUP, INC.		FL	No	No
11836	Citrus Health Care, Inc.		FL	Yes	No
11844	ST. JOHNS INSURANCE COMPANY, INC.		FL	Yes	No
11956	CORAL INSURANCE COMPANY		FL	Yes	No
11966	HEALTHCARE UNDERWRITERS GROUP OF FLORIDA		FL	No	No
11986	UNIVERSAL INSURANCE COMPANY OF NORTH AME!	71	FL	Yes	No
12011	TOWER HILL SELECT INSURANCE COMPANY	3484	FL	Yes	Yes
12155	Medica Health Plans of Florida, Inc.		FL	No	No
12196	ASI ASSURANCE CORP.	1344	FL	Yes	No
12216	NATIONAL GROUP INSURANCE COMPANY	343	FL	Yes	No
12220	SUPERIOR INSURANCE COMPANY	407	FL	Yes	No
12237	GULFSTREAM PROPERTY AND CASUALTY INSURAN		FL	Yes	No
12247	SOUTHERN OAK INSURANCE COMPANY		FL	Yes	No
12259	Optimum Healthcare, Inc.		FL	Yes	No
12264	LILLIAN ASSURANCE GROUP, INC.		FL	Yes	No
12306	HILLCREST INSURANCE COMPANY		FL	Yes	No
12314	AMERICAN MODERN INSURANCE COMPANY OF FLO	361	FL	Yes	No
12316	Avalon Hlthcare Inc		FL	Yes	No
12359	AMERICAN TRADITIONS INSURANCE COMPANY		FL	Yes	No
12360	OCEAN HARBOR CASUALTY INSURANCE COMPANY	4051	FL	Yes	No
12438	HOMEWISE INSURANCE COMPANY, INC.	4111	FL	Yes	No
12441	FLORIDA DOCTORS INSURANCE COMPANY		FL	Yes	No
12482	EDISON INSURANCE COMPANY		FL	Yes	No
12538	ROYAL PALM INSURANCE COMPANY		FL	Yes	No
12541	WINDHAVEN INSURANCE COMPANY		FL	Yes	No
12563	SAFE HARBOR INSURANCE COMPANY	4051	FL	Yes	No
12566	COMMERCIAL INSURANCE ALLIANCE, A RECIPROCA		FL	Yes	No

12568	NORTHERN CAPITAL INSURANCE COMPANY	4486	FL	Yes	No
12573	UNIVERSAL SPECIALTY INSURANCE COMPANY	71	FL	Yes	No
12577	Universal Health Care Ins Co Inc	4091	FL	Yes	No
12582	HOMEWISE PREFERRED INSURANCE COMPANY	4111	FL	Yes	No
12601	AMERICAN CAPITAL ASSURANCE CORP.	4575	FL	Yes	No
12615	APOLLO CASUALTY COMPANY OF FLORIDA	3501	FL	Yes	No
12756	Medica Healthcare Plans, Inc.**		FL	No	No
12813	AUTO CLUB INSURANCE COMPANY OF FLORIDA	1318	FL	Yes	Yes
12841	AMERICAN INTEGRITY INSURANCE COMPANY OF FI		FL	Yes	No
12842	FCCI ADVANTAGE INSURANCE COMPANY	474	FL	Yes	No
12873	PRIVILEGE UNDERWRITERS RECIPROCAL EXCHANG	4664	FL	Yes	Yes
12944	HOMEOWNERS CHOICE PROPERTY & CASUALTY INS		FL	Yes	No
12953	K.E.L. TITLE INSURANCE GROUP, INC.		FL	Yes	No
12954	OLYMPUS INSURANCE COMPANY		FL	Yes	No
12957	MODERN USA INSURANCE COMPANY		FL	Yes	No
12967	MedAmerica Ins Co of FL	1186	FL	Yes	No
12968	AMERICAN COASTAL INSURANCE COMPANY		FL	Yes	No
12973	AIDS Healthcare Foundation MCO of Florida, Inc. d/b/a Positive Hea		FL	Yes	No
12985	First Medical Health Plan of Florida, Inc.		FL	No	No
13003	PENINSULAR SURETY COMPANY		FL	No	No
13012	NORMANDY HARBOR INSURANCE COMPANY, INC.		FL	No	No
13026	MAIN STREET AMERICA PROTECTION INSURANCE C	311	FL	Yes	No
13038	ARK ROYAL INSURANCE COMPANY		FL	Yes	No
13125	PEOPLE'S TRUST INSURANCE COMPANY		FL	Yes	No
13128	Molina Healthcare of Florida, Inc.		FL	Yes	No
13131	RESPONSIVE AUTO INSURANCE COMPANY (THE)		FL	Yes	No
13139	AVATAR PROPERTY & CASUALTY INSURANCE COM		FL	Yes	No
13141	MAGNOLIA INSURANCE COMPANY		FL	Yes	No
13142	ASI PREFERRED INSURANCE CORP.	1344	FL	Yes	No
13148	Sunshine State Health Plan, Inc.		FL	Yes	No
13159	Physicians Health Choice of Florida, Inc		FL	Yes	No
13204	PURE INSURANCE COMPANY	4664	FL	Yes	Yes
13563	AMERICAN PLATINUM PROPERTY AND CASUALTY I	4663	FL	Yes	No
13567	Florida Health Care Plan, Inc.		FL	Yes	Yes
13596	Bupa Ins Ltd Co--US Branch (Alien)	4679	FL	Yes	No
13599	CASTLEPOINT FLORIDA INSURANCE COMPANY	3703	FL	Yes	No
13602	Pan Amer Assur Co Intl Inc--US Branch (Alien)	525	FL	Yes	Yes
13619	SAWGRASS MUTUAL INSURANCE COMPANY		FL	No	No
13621	STAR & SHIELD INSURANCE EXCHANGE		FL	Yes	No
13648	LAKEVIEW INSURANCE COMPANY	4674	FL	Yes	No
13663	Employer Choice Ins Co Inc		FL	No	No
13671	ECHELON INSURANCE COMPANY OF AMERICA		FL	Yes	No
13683	ASCENDANT COMMERCIAL INSURANCE, INC.		FL	Yes	No
13687	PREPARED INSURANCE COMPANY		FL	Yes	No
13698	AGIC, INC.		FL	Yes	No
13990	FIRST COMMUNITY INSURANCE COMPANY	689	FL	Yes	No
14788	NGM INSURANCE COMPANY	311	FL	Yes	No
15075	UNION AMERICAN INSURANCE COMPANY		FL	Yes	No
16497	AZTEC INSURANCE COMPANY		FL	Yes	No
16870	GRANADA INSURANCE COMPANY		FL	Yes	No
17350	PROGRESSIVE BAYSIDE INSURANCE COMPANY	155	FL	Yes	No
21300	KINGSWAY AMIGO INSURANCE COMPANY	1326	FL	Yes	No
21817	FLORIDA FARM BUREAU GENERAL INSURANCE COI	483	FL	Yes	Yes
22560	CLARENDON SELECT INSURANCE COMPANY	517	FL	Yes	No
23140	ASSOCIATED INDUSTRIES INSURANCE COMPANY, IN	2538	FL	Yes	No
23450	AMERICAN FAMILY HOME INSURANCE COMPANY	361	FL	Yes	No
24252	PROGRESSIVE AMERICAN INSURANCE COMPANY	155	FL	Yes	No
24619	AEQUICAP INSURANCE COMPANY		FL	Yes	No
24660	CUMBERLAND CASUALTY AND SURETY COMPANY		FL	Yes	No
25402	EMPLOYERS ASSURANCE COMPANY	3363	FL	Yes	No
25755	PEACHTREE CASUALTY INSURANCE COMPANY		FL	Yes	No
26379	ACCREDITED SURETY AND CASUALTY COMPANY, I		FL	Yes	No
26492	COURTESY INSURANCE COMPANY	281	FL	Yes	No
27980	FEDERATED NATIONAL INSURANCE COMPANY	2879	FL	Yes	No
29050	TOWER HILL PREFERRED INSURANCE COMPANY	3484	FL	Yes	Yes
29939	MAIN STREET AMERICA ASSURANCE COMPANY	311	FL	Yes	No
29980	FIRST COLONIAL INSURANCE COMPANY	8	FL	Yes	No
31151	AMERICAN COLONIAL INSURANCE COMPANY, INC.		FL	Yes	No
31216	FLORIDA FARM BUREAU CASUALTY INSURANCE CC	483	FL	Yes	Yes
32174	REPUBLIC MORTGAGE INSURANCE COMPANY OF FL	150	FL	Yes	No
32387	STAR CASUALTY INSURANCE COMPANY		FL	No	No
32760	LIBERTY AMERICAN SELECT INSURANCE COMPANY	677	FL	Yes	No
32930	CAPACITY INSURANCE COMPANY		FL	Yes	No
33030	INSURANCE COMPANY OF THE AMERICAS		FL	Yes	No
33120	SECURITY NATIONAL INSURANCE COMPANY	212	FL	Yes	No

33162	BANKERS INSURANCE COMPANY	689	FL	Yes	No
33383	FIRST PROFESSIONALS INSURANCE COMPANY, INC	1272	FL	Yes	No
33472	FCCI COMMERCIAL INSURANCE COMPANY	474	FL	Yes	No
33502	MACHINERY INS. INC., AN ASSESSABLE MUTUAL IN!		FL	No	No
33545	SEMINOLE CASUALTY INSURANCE COMPANY		FL	Yes	No
34150	FLORIDA LAWYERS MUTUAL INSURANCE COMPANY		FL	Yes	No
34762	SUNZ INSURANCE COMPANY		FL	Yes	No
34932	MAPFRE INSURANCE COMPANY OF FLORIDA	411	FL	Yes	No
35319	UNITED AUTOMOBILE INSURANCE COMPANY	1235	FL	Yes	No
36560	SERVICE INSURANCE COMPANY		FL	Yes	Yes
36617	CAPITAL ASSURANCE COMPANY, INC.		FL	Yes	No
37656	ANESTHESIOLOGISTS PROFESSIONAL ASSURANCE (	1272	FL	Yes	No
37672	SEVEN SEAS INSURANCE COMPANY, INC.		FL	Yes	No
38644	OMEGA INSURANCE COMPANY	3484	FL	Yes	Yes
39462	NORTH POINTE CASUALTY INSURANCE COMPANY	796	FL	Yes	No
39551	CONTINENTAL HERITAGE INSURANCE COMPANY	3592	FL	Yes	No
40231	OLD DOMINION INSURANCE COMPANY	311	FL	Yes	No
41041	AUTO CLUB SOUTH INSURANCE COMPANY		FL	Yes	No
41998	AMERICAN SOUTHERN HOME INSURANCE COMPAN	361	FL	Yes	No
42137	NATIONAL INDEMNITY COMPANY OF THE SOUTH	31	FL	Yes	No
42706	ROCHE SURETY AND CASUALTY COMPANY, INC.		FL	Yes	No
43699	AMERICAN FEDERATION INSURANCE COMPANY	212	FL	Yes	No
44415	YEL CO. INSURANCE		FL	No	No
50695	NATIONAL TITLE INSURANCE COMPANY		FL	Yes	No
52631	HealthEase of Florida, Inc.		FL	Yes	No
60275	American Bankers Life Assur Co Of FL	19	FL	Yes	No
60429	American Fidelity Life Ins Co		FL	Yes	No
60534	American Heritage Life Ins Co	8	FL	Yes	No
60763	American Pioneer Life Ins Co	953	FL	Yes	No
63886	Best Meridian Ins Co		FL	Yes	No
69671	Humana Health Ins Co Of FL, Inc	119	FL	Yes	No
76031	Florida Combined Life Ins Co Inc	876	FL	Yes	Yes
81043	Bankers Life Ins Co	689	FL	Yes	No
81647	Bupa Ins Co	4679	FL	Yes	No
88340	Hannover Life Reassur Co of America	517	FL	Yes	No
89958	JMIC Life Ins Co	281	FL	Yes	No
98167	BCBS Of FL	536	FL	Yes	Yes
99999	FLORIDA AUTOMOBILE JOINT UNDERWRITING ASS(		FL	No	No
-	FLORIDA CITRUS, BUSINESS & INDUSTRIES FUND		FL	No	No
-	FLORIDA ENERGY MARKETERS SELF-INSURERS FUN		FL	No	No
-	FLORIDA HOSPITAL WORKERS' COMPENSATION SI F		FL	No	No
-	FLORIDA HURRICANE CATASTROPHE FUND		FL	No	No
-	FLORIDA INDEPENDENT COLLEGES & UNIVERSITIES		FL	No	No
-	FLORIDA INSURANCE TRUST		FL	No	No
-	FLORIDA MEDICAL MALPRACTICE JUA		FL	No	No
-	FLORIDA MUNICIPAL INSURANCE TRUST		FL	No	No
-	FLORIDA PATIENT'S COMPENSATION FUND		FL	No	No
-	FLORIDA PUBLIC HOUSING AUTHORITY SELF INSUR		FL	No	No
-	FLORIDA WORKERS COMPENSATION JUA		FL	No	No
-	FRSA SELF INSURERS FUND		FL	No	No
-	PREFERRED GOVERNMENTAL INSURANCE TRUST (P		FL	No	No
-	SOUTH FLORIDA DENTISTS SELF INSURANCE TRUST		FL	No	No
-	SOUTH FLORIDA OPHTHALMOLOGICAL SELF INSUR		FL	No	No
-	SOUTH FLORIDA PHYSICIANS EXCESS INSURING TRI		FL	No	No
-	SOUTH PINELLAS MEDICAL TRUST		FL	No	No
-	20/20 Eyecare Plan, Inc.		FL	No	No
-	Argus Dental Plan, Inc.		FL	No	No
-	Bull Dolphin Enterprises, Inc. D/B/A Rescuecare		FL	No	No
-	FLORIDA BIRTH-RELATED NEUROLOGICAL INJURY COMPE		FL	No	No
-	Florida Health Solution, Corp.		FL	No	No
-	Florida Healthcare Plus, Inc.		FL	No	No
-	FLORIDA HOSPITAL EXCESS TRUST FUND		FL	No	No
-	FLORIDA RURAL ELECTRIC SELF INSURER'S FUND		FL	No	No
-	FLORIDA RURAL ELECTRIC SELF INSURER'S FUND		FL	No	No
-	FLORIDA SHERIFF'S WORKERS' COMPENSATION SELF-INSUI		FL	No	No
-	Lakeview Center, Inc.		FL	No	No
-	Managed Care of North America, Inc.		FL	No	No
-	Medical Air Services Assoc. of Florida, Inc.		FL	No	No
-	Medics Subscription Services, Inc.		FL	No	No
-	Preferred Medical Plan, Inc.		FL	No	No
-	ProMedical Plan, PHC, Inc.		FL	No	No
-	Solstice Benefits, Inc. F/K/A Starmark Benefits, Inc.		FL	No	No
-	Advantica Eyecare, Inc.		FL	Yes	No
-	Atlantic Ambulance Service, Acquisition, Inc.		FL	Yes	No
-	Atlantic Dental, Inc.		FL	Yes	No

-	Care Access Health Plan, Inc.		FL	Yes	No
-	Cigna Dental Health of Florida, Inc.		FL	Yes	No
-	CompBenefits Company		FL	Yes	No
-	Dental Benefit Providers of Illinois, Inc.		FL	Yes	No
-	Florida Health Partners, Inc.		FL	Yes	No
-	Magellan Behavioral Health of FL, Inc.		FL	Yes	No
-	MHNET of Florida, Inc.		FL	Yes	No
-	North FL Behavioral Health Partners, Inc.		FL	Yes	No
-	Safeguard Health Plans, Inc.		FL	Yes	No
-	Skymed International (Florida), Inc.		FL	Yes	No
-	The Dental Concern, Inc.		FL	Yes	No
-	United Concordia Dental Plans of Florida, Inc.		FL	Yes	No
10000	Commercial Mutual Insurance Company		GA	No	No
10015	Mercury Indemnity Company of Georgia	660	GA	Yes	No
10016	Tift Area Captive Insurance Company		GA	No	No
10039	Georgia Timber Harvesters' Mutual Captive Ins. Co., Inc.		GA	No	No
10172	Westchester Surplus Lines Insurance Company	626	GA	Yes	No
10211	TPA Captive Insurance Company, Inc		GA	No	No
10704	Builders Insurance (A Mutual Captive Company)	1302	GA	Yes	Yes
10705	Southeast Employers Mutual Captive Insurance Company		GA	No	No
10760	Wellcare of Georgia, Inc.	1199	GA	Yes	No
10798	VFH Captive Insurance Company	2778	GA	Yes	Yes
10802	Ethio-American Insurance Company		GA	Yes	No
10874	Georgia Restaurant Mutual Captive Insurance Company		GA	No	No
10894	United Group Captive Insurance Company		GA	No	No
10898	Delta Fire & Casualty Insurance Co.	598	GA	Yes	Yes
10917	Century Casualty Company		GA	No	No
11040	Ontario Reinsurance Company c/o BNK&J		GA	No	No
11065	Chattahoochee RRG Captive Insurance Company		GA	No	No
11091	HealthCare Mutual Captive Insurance Company		GA	No	No
11154	Hospitality Mutual Captive Insurance Company		GA	No	No
11162	Insurance Company of the South	17	GA	Yes	No
11184	Southeastern U.S. Captive Insurance, Inc.		GA	No	No
11240	Association Insurance Company	1302	GA	Yes	Yes
11256	Alliant Health Plans, Inc.		GA	Yes	No
11258	Georgia Casualty & Surety Company	807	GA	Yes	Yes
11263	United Business Insurance Company		GA	No	No
11508	First Acceptance Insurance Company of GA, Inc.	3362	GA	Yes	No
12159	Joliet Area RRG Captive Insurance Company		GA	No	No
12229	AMGP Georgia Managed Care Company, Inc.	1156	GA	Yes	No
12315	Peach State Health Plan, Inc.	1295	GA	Yes	No
12328	Aetna Family Plans of GA, Inc.	1	GA	Yes	No
12552	Qualicare Self Insurance Trust		GA	No	No
12610	Southern Trust Insurance Company		GA	No	No
12628	Arcadian Health Plan of Georgia	3681	GA	Yes	No
12636	Crown Captive Insurance Company		GA	No	No
12811	Georgia Transportation Captive Insurance Company		GA	No	No
12981	DaVita VillageHealth of Georgia, Inc.	4422	GA	Yes	No
13009	Georgia Dealers Insurance Company		GA	No	No
13071	CompTrust AGC Mutual Captive Insurance Company		GA	No	No
13168	Americhoice of GA, Inc.	707	GA	Yes	No
13382	Harleysville-Atlantic Insurance Company	253	GA	Yes	Yes
14001	Georgia Farm Bureau Mutual Insurance Company	561	GA	Yes	Yes
14028	Georgia Mutual Insurance, A Stock Company		GA	Yes	No
14524	Middle Georgia Mutual Insurance Company	3550	GA	Yes	Yes
15172	Southern Mutual Insurance Company		GA	No	No
19003	Waco Fire and Casualty Insurance Company		GA	No	No
20168	Global Insurance Company	3550	GA	Yes	Yes
20966	Cotton States Mutual Insurance Company	50	GA	Yes	No
20974	Shield Insurance Company	50	GA	Yes	No
21560	Cornerstone Mutual Insurance Company		GA	No	No
22110	Everest Security Insurance Company	1120	GA	Yes	No
25640	Safeway Insurance Company of Georgia	257	GA	Yes	No
30112	CNL Insurance America, Inc.	869	GA	Yes	No
33103	American Safety Insurance Company	587	GA	Yes	No
34410	Mercury Insurance Company of Georgia	660	GA	Yes	No
34436	Georgia Farm Bureau Casualty Insurance Company	561	GA	Yes	Yes
37141	Southern General Insurance Company	254	GA	Yes	No
37311	Southern General Underwriters Insurance Company	254	GA	Yes	No
40428	Voyager Indemnity Insurance Company	19	GA	Yes	No
40762	Southern Casualty Insurance Company (formerly Southern Guaranty Insurance Company of GA)		GA	No	No
42536	Frandisco Property and Casualty Insurance Company	40	GA	Yes	No
42617	Mag Mutual Insurance Company	413	GA	Yes	Yes

54801	Blue Cross and Blue Shield of Georgia, Inc.	671	GA	Yes	No
61093	Atlanta Life Insurance Company		GA	Yes	No
61239	Bankers Fidelity Life Insurance Company	587	GA	Yes	No
61824	Cherokee National Life Insurance Company	869	GA	Yes	No
62537	Cotton States Life Insurance Company	50	GA	Yes	No
62650	Delta Life Insurance Company	598	GA	Yes	Yes
66346	Munich American Reassurance Company	361	GA	Yes	No
69132	State Mutual Insurance Company	4172	GA	Yes	Yes
71919	Direct Life Insurance Company	1213	GA	Yes	No
78662	Senior Life Insurance Company		GA	Yes	No
86096	Financial Life Insurance Company of Georgia	471	GA	Yes	No
89079	Frandisco Life Insurance Company	40	GA	Yes	No
89184	Sterling Investors Life Insurance Company		GA	No	No
91693	IA American Life Insurance Company	315	GA	Yes	No
95094	Aetna Health, Inc.	1	GA	Yes	No
95282	Coventry Healthcare of Georgia, Inc.	1137	GA	Yes	No
95519	Humana Employers Health Plan of Georgia, Inc	119	GA	Yes	No
95691	Athens Area Health Plan Select, Inc.		GA	Yes	No
95837	Evergreen Health Plan, Inc.		GA	Yes	No
95850	United Healthcare of Georgia, Inc.	707	GA	Yes	No
96229	Cigna Healthcare of Georgia, Inc.	901	GA	Yes	No
96237	Kaiser Foundation Health Plan of Georgia, Inc.	601	GA	Yes	No
96962	Blue Cross Blue Shield Healthcare Plan of GA, Inc.	671	GA	Yes	No
97217	Greater Georgia Life Insurance Company	671	GA	Yes	No
97691	Life of The South Insurance Company	17	GA	Yes	No
-	Georgia Pharmacy Association Insurance Trust		GA	No	No
10080	Health Providers Ins Recip RRG		HI	Yes	No
10087	Specialty Ins Co of HI Inc		HI	Yes	No
10145	Constellation Ins Co Inc		HI	Yes	No
10147	Worldwide Risk Ins Inc		HI	Yes	No
10390	Workcomp Hi Ins Co Inc	1142	HI	Yes	No
10619	First Automotive Ins RRG Inc		HI	Yes	No
10691	Residential Ins Co Inc A RRG	2378	HI	Yes	No
10763	Cascadia Ins Co		HI	Yes	No
10781	Hawaii Employers Mut Ins Co		HI	No	No
10797	Workcomp Hi Select Inc	1142	HI	Yes	No
10805	American Pacific Ins Co Inc	212	HI	Yes	No
10840	Professional Medical Ins RRG Inc		HI	Yes	No
10893	Primeguard Ins Co Inc A RRG		HI	Yes	No
10938	First Security Ins Of HI Inc	218	HI	Yes	No
10967	Newport Mut Ins RRG Inc		HI	Yes	No
11026	Zephyr Ins Co Inc	4051	HI	Yes	No
11058	Reliant Structural Warranty Ins Co		HI	Yes	No
11538	Kaiser Found Hlth Plan Inc HI Region	601	HI	Yes	No
11603	Contractors Ins Co of N Amer Inc RRG	3482	HI	Yes	No
11689	Island Premier Ins Co Ltd	106	HI	Yes	No
11965	Allegiant Ins Co Inc A RRG		HI	Yes	No
12005	Sentinel Assur RRG Inc		HI	Yes	No
12020	AG Airgroup Ins Inc		HI	Yes	No
12023	Aquablue Ins Co Inc		HI	Yes	No
12024	ARC Reins Corp		HI	Yes	Yes
12026	Asic H Ltd		HI	Yes	No
12027	BC Ins Co Inc		HI	Yes	No
12030	Caduceus Ind Ins Corp Ltd		HI	Yes	No
12031	CAP Ins Co Inc		HI	Yes	No
12032	Caregivers Reins Inc		HI	Yes	No
12034	Cast & Crew Ins Co Inc		HI	Yes	No
12035	Casualty Ins HI Ltd		HI	Yes	No
12036	CAWCD Ins Co Inc		HI	Yes	No
12038	CHC Ins Co Inc		HI	Yes	No
12039	Chesapeake Assur Ltd		HI	Yes	No
12040	Commercial Gen Ind Inc	31	HI	Yes	No
12042	Cooperative of Amer Physicians Ins		HI	Yes	No
12043	Covenant Reins Co Inc		HI	Yes	No
12044	CPN Ins Corp		HI	Yes	No
12045	Del Mar Ind Co Inc		HI	Yes	No
12046	EB Reins Corp		HI	Yes	No
12047	ECI Reins Corp		HI	Yes	No
12048	Edison Ins Serv Inc		HI	Yes	No
12052	F L Ins Corp		HI	Yes	No
12053	First Pacific Ind Co Inc		HI	Yes	No
12055	FirstMerit Mortgage Reins Co Inc		HI	Yes	No
12056	Flowcom Ins Co Inc		HI	Yes	No
12057	Fraternal Ins Co Inc		HI	Yes	No
12058	Front Range Ins Co Inc		HI	Yes	No

12059	GLIC LLC	HI	Yes	No
12060	GC Ins Co Inc	HI	Yes	No
12061	Granite Assur Co Inc	HI	Yes	No
12062	HI Telcom Ins Co Inc	HI	Yes	No
12063	H & M Ins HI Inc	HI	Yes	No
12065	Hoopaa Ins Corp	HI	Yes	No
12067	Insurance Co of Trinet USA Inc	HI	Yes	Yes
12070	Kakona Ins Co Inc	HI	Yes	No
12071	KM Ins Co Inc	HI	Yes	No
12073	KT Ins Co Inc	HI	Yes	No
12074	Kubota Ins Corp	HI	Yes	No
12075	Kyo Ya Ins Serv Ltd	HI	Yes	No
12077	Lokahi Assur Ltd	HI	Yes	No
12078	Marquis Ins Corp	HI	Yes	No
12080	MedAmerica Reins Co Inc	HI	Yes	No
12081	Meritage Ins Grp Inc	HI	Yes	No
12082	Mid Pacific Ins Co Inc	HI	Yes	No
12086	National Liberty Ins Co Inc	HI	Yes	No
12087	National Orion Ins Co Inc	HI	Yes	No
12091	Nissan Motor Ins Corp	HI	Yes	No
12093	NSP Cas Ins Co Inc	HI	Yes	No
12095	Oakridge Ins Inc	HI	Yes	No
12096	Oceanic Ins Inc	HI	Yes	No
12097	Opcal Ins Inc	HI	Yes	No
12098	Otsuka Global Ins Inc	HI	Yes	No
12099	OWLCO Ind Ltd	HI	Yes	No
12100	P&C Ins Co Inc	HI	Yes	No
12101	Pacific Cas Co Inc	HI	Yes	No
12102	Pacific Century Ins Serv Inc	HI	Yes	No
12103	Pacific Commonwealth Ins Co Inc	HI	Yes	No
12104	Pacific Unified Ins Co Inc	HI	Yes	No
12105	Pacifica Ins Corp	HI	Yes	No
12107	Paradigm Ind Corp	HI	Yes	No
12108	Paramount Ins Inc	HI	Yes	No
12109	Partners Ins Co Inc	HI	Yes	No
12111	Portage Bay Ins	HI	Yes	No
12112	Providers Ins Corp	HI	Yes	No
12113	PS Ins Co HI Ltd	HI	Yes	No
12115	Pyramid Ins Co Ltd	HI	Yes	Yes
12116	Queens Ins Exch Inc	HI	Yes	No
12117	Real State Ins LLC	HI	Yes	No
12118	RH Ins Co Inc	HI	Yes	No
12120	Royal Hawaiian Ins Co Ltd	HI	Yes	No
12121	Rye Ins Co Inc	HI	Yes	No
12123	Seamont Ins Inc	HI	Yes	No
12124	Servco Automotive Ins Co Inc	HI	Yes	No
12126	Sierra Underwriting Co Ltd	HI	Yes	No
12127	SN Ins Co Inc	HI	Yes	No
12128	StarAmerican Ins Ltd	HI	Yes	No
12129	Stor Re Mut Ins Co Inc	HI	Yes	No
12131	Sutter Ins Serv Corp	HI	Yes	No
12132	TPI Ins Corp	HI	Yes	No
12133	Terrace Pacific Ins Ltd	HI	Yes	No
12134	Transamerica Pacific Ins Co Ltd	HI	Yes	Yes
12135	Triax Ins Inc	HI	Yes	No
12136	United Church Ins Co Inc	HI	Yes	No
12137	Vintage Ins Inc	HI	Yes	No
12138	Western States Ins Co Inc	HI	Yes	No
12139	WM Mortgage Reins Co Inc	HI	Yes	No
12140	Workers Assur of HI Inc	HI	Yes	No
12141	Wynnewood Ins Corp	HI	Yes	No
12142	Yazaki Ins Co	HI	Yes	No
12160	Central Valley Ins Co Inc	HI	Yes	No
12161	Seattle Financial Reins Co Inc	HI	Yes	No
12162	Sanyo Global Ins Inc	HI	Yes	No
12163	Capri Ins Corp	HI	Yes	No
12164	American Ind Corp	HI	Yes	No
12182	Technology Assur Ltd	HI	Yes	No
12184	Southern OR Ins Inc	HI	Yes	No
12185	Community Clinics Ins Co Inc	HI	Yes	No
12186	Premier Ind Co Inc	HI	Yes	No
12201	Marketplace Ins Inc	HI	Yes	No
12202	Eplica Ins Co Inc	HI	Yes	No
12204	Plumeria Ins Co Inc	HI	Yes	No
12205	Crestmont Ins Co	HI	Yes	No

12206	Willamette Valley Ins Corp		HI	Yes	No
12207	Davis Pacific Ind Co Inc		HI	Yes	No
12222	American Nutritional Cas Ins Inc		HI	Yes	No
12240	Freedom Cas Ins Co Inc		HI	Yes	No
12267	Captive Ins for Public Agencies Ltd		HI	Yes	No
12268	Oaktree Ins Co Inc		HI	Yes	No
12269	Beton Ins Co Inc		HI	Yes	No
12271	HMS Ins Co Inc		HI	Yes	No
12295	Bishop Street Ins Corp		HI	Yes	No
12333	Sutter Physicians Ins Coalition Inc		HI	Yes	No
12469	Relo Global Reins Inc		HI	Yes	No
12500	Scholle Ins Co Inc		HI	Yes	No
12501	Hoku pa a 156 Ins Co Inc		HI	Yes	No
12502	Dongbu Ins Co Ltd	4672	HI	Yes	No
12543	Global Energy Resource Ins Co USA		HI	Yes	No
12544	Denso Reins Amer Inc		HI	Yes	No
12574	National Risk & Safety Ins Inc		HI	Yes	No
12642	Sodexho Ho Okipa Ins Co Inc		HI	Yes	No
12767	Hawaiian Ins & Guar Co Ltd	4576	HI	Yes	No
12818	MHC Ins Co Ltd		HI	Yes	No
12819	WellPoint Ins Serv Inc		HI	Yes	No
12867	Voluntary Employees Benefit Assn of		HI	No	No
12868	Mutual Benefit Assn of HI		HI	No	No
12889	Tri Vecta Ind Co Inc		HI	Yes	No
12891	Pacific Western Ins Co LLC		HI	Yes	No
12903	DTRIC Ins Underwriters Ltd	4513	HI	Yes	No
12940	KWE Reins Inc		HI	Yes	No
13000	Orlando Ins Co Inc		HI	Yes	No
13001	Bay Front Ins Co Inc		HI	Yes	No
13002	Virginia Ins Co Inc		HI	Yes	No
13087	Pacific Island Ind Inc		HI	Yes	No
13088	Bayshore Ins Co Inc		HI	Yes	No
13089	Marine Ins Co Inc		HI	Yes	No
13090	Grand Ins Co Inc		HI	Yes	No
13091	Headland Ins Co Inc		HI	Yes	No
13144	PermCore Ins Co Ltd		HI	Yes	No
13146	Fujifilm Ins HI Inc		HI	Yes	No
13184	Kapolei Prop Ins LLC		HI	Yes	No
13555	Westridge Ins Co TRS Inc		HI	Yes	No
13556	Advance Create Reins Inc		HI	Yes	No
13582	PIH Ins Co Recip RRG		HI	Yes	No
13591	Ramco Ins Co Inc		HI	Yes	No
13645	Lehua Ins Co Inc		HI	Yes	No
13738	Life Alliance Reassur Corp		HI	Yes	No
13745	Giava Ins Co Inc		HI	Yes	No
22670	Attorneys Ins Mut RRG Inc		HI	Yes	No
22845	Island Ins Co Ltd	106	HI	Yes	No
22853	Tradewind Ins Co Ltd	106	HI	Yes	No
26257	Medamerica Mut RRG Inc		HI	Yes	No
28487	Farmers Ins HI Inc	212	HI	Yes	No
36072	National Guardian RRG Inc		HI	Yes	No
37265	DTRIC Ins Co Ltd	4513	HI	Yes	No
39500	Firemans Fund Ins Co Of HI Inc	761	HI	Yes	No
41726	First Fire & Cas Ins Of HI Inc	218	HI	Yes	No
41734	First Ind Ins Of HI Inc	218	HI	Yes	No
41742	First Ins Co Of HI Ltd	218	HI	Yes	No
41920	North Amer Builders Ind Co	3482	HI	Yes	No
43770	Clinic Mut Ins Co RRG		HI	Yes	No
44504	California Hlthcare Ins Co Inc RRG		HI	Yes	No
44598	College Liab Ins Co Recip RRG		HI	Yes	No
47953	University Hlth Alliance		HI	No	No
48330	Hawaii Mgmt Alliance Assn		HI	No	No
49948	Hawaii Medical Serv Assn	1142	HI	Yes	No
64343	Pacific Guardian Life Ins Co Ltd		HI	Yes	Yes
68551	Royal State Natl Ins Co Ltd		HI	Yes	No
73989	Mililani Life Ins Co Ltd		HI	Yes	No
84162	Pacific Beacon Life Reassur Inc	1278	HI	Yes	Yes
95853	Aloha Care		HI	No	No
10510	Carolina Cas Ins Co	98	IA	Yes	No
10804	Continental Western Ins Co	98	IA	Yes	No
10847	Cumis Ins Society Inc	306	IA	Yes	No
11014	Brookwood Ins Co	31	IA	Yes	No
11062	Petroleum Marketers Mgmt Ins Co		IA	No	No
11127	Professional Solutions Ins Co	2638	IA	Yes	No
11983	Auto Club Prop Cas Ins Co	55	IA	Yes	No

12340	Western Iowa Mut Ins Assoc		IA	No	No
12494	Prairie Mut Ins Assn		IA	No	No
12528	Wadena Ins Co	3991	IA	Yes	No
12553	Heartland Mut Ins Assn		IA	No	No
12616	American Mut Ins Assn		IA	No	No
12718	Developers Surety & Ind Co	75	IA	Yes	No
12758	Cumis Specialty Ins Co Inc	306	IA	Yes	No
12817	DMC Mut Ins Assn		IA	No	No
12869	Century Mut Ins Assn		IA	No	No
12919	Preston Mut Ins Assn		IA	No	No
12982	Great Plains Cas Inc		IA	Yes	No
13021	United Fire & Cas Co	248	IA	Yes	Yes
13061	Farmers Mut Ins Assn of Osceola Cnty		IA	No	No
13077	Principal Life Ins Co Iowa	332	IA	Yes	No
13165	Patrons Mutual Ins Assoc		IA	No	No
13172	Winnebago Mut Ins Assn		IA	No	No
13183	Eagle Life Ins Co	2658	IA	Yes	No
13714	Pharmacists Mut Ins Co	775	IA	Yes	Yes
13742	Veratrus Benefit Solutions Inc	4690	IA	Yes	No
13773	Farm Bureau Mut Ins Co	513	IA	Yes	No
13811	Farmers Cas Ins Co	175	IA	Yes	Yes
13838	Farmland Mut Ins Co	140	IA	Yes	Yes
13897	Farmers Mut Hail Ins Co Of IA	569	IA	Yes	Yes
13984	Guideone Prop & Cas Ins Co	303	IA	Yes	Yes
14117	Grinnell Mut Reins Co	518	IA	Yes	Yes
14125	Hamilton Mut Ins Co	62	IA	Yes	Yes
14257	IMT Ins Co	3991	IA	Yes	No
14338	Iowa Mut Ins Co	291	IA	Yes	Yes
14389	Le Mars Ins Co	250	IA	Yes	No
14494	Merchants Bonding Co a Mut	3479	IA	Yes	Yes
14559	Guideone Specialty Mut Ins Co	303	IA	Yes	Yes
15032	Guideone Mut Ins Co	303	IA	Yes	Yes
15865	NCMIC Ins Co	2638	IA	Yes	No
16144	Grinnell Select Ins Co	518	IA	Yes	Yes
16381	Farmers Union Coop Ins Co	569	IA	Yes	Yes
16760	First Maxfield Mut Ins Assoc		IA	No	No
18392	Central Ia Mut Ins Assn		IA	No	No
19100	Amco Ins Co	140	IA	Yes	Yes
20060	National Ind Co of Mid Amer	31	IA	Yes	No
21407	Emcasco Ins Co	62	IA	Yes	Yes
21415	Employers Mut Cas Co	62	IA	Yes	Yes
21423	Union Ins Co Of Providence	62	IA	Yes	Yes
25127	State Auto Prop & Cas Ins Co	175	IA	Yes	Yes
25186	Emc Prop & Cas Ins Co	62	IA	Yes	Yes
25844	Union Ins Co	98	IA	Yes	No
27014	MFS Mut Ins Co		IA	No	No
27871	Western Agric Ins Co	513	IA	Yes	No
27987	Northfield Ins Co	3548	IA	Yes	No
28223	Nationwide Agribusiness Ins Co	140	IA	Yes	Yes
28258	Continental Ind Co	31	IA	Yes	No
31577	Iowa Amer Ins Co	291	IA	Yes	Yes
31593	Northern Cas Co	3479	IA	Yes	Yes
31623	Clinton Mut Plate Glass Assoc		IA	No	No
32808	Illinois Emcasco Ins Co	62	IA	Yes	Yes
33480	Clermont Ins Co	98	IA	Yes	No
34738	Arag Ins Co		IA	Yes	No
35386	Fidelity & Guar Ins Co	3548	IA	Yes	No
37281	Independent Truckers Ins Co		IA	No	No
37621	Toyota Motor Ins Co		IA	Yes	No
38911	Berkley Natl Ins Co	98	IA	Yes	No
40509	Emc Reins Co	62	IA	Yes	Yes
42331	Guideone Amer Ins Co	303	IA	Yes	Yes
42579	Allied Prop & Cas Ins Co	140	IA	Yes	Yes
42587	Depositors Ins Co	140	IA	Yes	Yes
42757	Agri Gen Ins Co		IA	Yes	No
42765	Centurion Cas Co	471	IA	Yes	No
42803	Guideone Elite Ins Co	303	IA	Yes	Yes
44202	American Feed Industry Ins Co RRG		IA	No	No
44865	Pioneer Mut Ins Assoc		IA	No	No
52559	Medical Assoc Hlth Plan Inc		IA	Yes	No
55786	Delta Dental Plan of IA	4690	IA	Yes	No
58017	Western Fraternal Life Assn		IA	No	No
60836	American Republic Ins Co	3527	IA	Yes	No
61271	Principal Life Ins Co	332	IA	Yes	No
61689	Aviva Life & Ann Co	44	IA	Yes	No

62383	Centurion Life Ins Co	471	IA	Yes	No
62510	Equitrust Life Ins Co	513	IA	Yes	No
62626	Cuna Mut Ins Society	306	IA	Yes	No
62928	EMC Natl Life Co		IA	Yes	No
63088	Farm Bureau Life Ins Co	513	IA	Yes	No
64505	Homesteaders Life Co		IA	No	No
64890	Berkley Life & Hlth Ins Co	98	IA	Yes	No
66044	Midland Natl Life Ins Co	431	IA	Yes	No
66281	Monumental Life Ins Co	468	IA	Yes	No
66974	Nonh Amer Co Life & Hlth Ins	431	IA	Yes	No
69973	United Life Ins Co	248	IA	Yes	Yes
71161	Principal Natl Life Ins Co	332	IA	Yes	No
80942	ING USA Ann & LIfe Ins Co	229	IA	Yes	No
81264	Nippon Life Ins Co Of Amer		IA	Yes	Yes
83607	Guggenheim Life & Ann Co	431	IA	Yes	No
86126	Members Life Ins Co	306	IA	Yes	No
86231	Transamerica Life Ins Co	468	IA	Yes	No
88848	Wellmark Inc	770	IA	Yes	Yes
90247	Pharmacists Life Ins Co	775	IA	Yes	Yes
90255	Hawkeye Life Ins Grp Inc		IA	Yes	No
92738	American Equity Invest Life Ins Co	2658	IA	Yes	No
95241	Coventry Hlth Care of IA Inc	1137	IA	Yes	No
95531	Wellmark Hlth Plan of IA Inc	770	IA	Yes	Yes
-	Keokuk ODS		IA	No	No
-	Magellan		IA	Yes	No
13765	Farm Bureau Mut Ins Co Of ID	842	ID	Yes	Yes
18457	Gem State Ins Co		ID	No	No
18939	United Heritage Prop & Cas Co	2878	ID	Yes	No
21601	Farmers Ins Co Of ID	212	ID	Yes	No
34576	Workers Comp Exch		ID	No	No
36129	Idaho State Ins Fund		ID	No	No
36480	Idaho Counties Risk Mgmt Program		ID	No	No
37370	Associated Loggers Exch		ID	No	No
37931	American Farmers & Ranchers Ins Co	1321	ID	Yes	Yes
39519	Western Comm Ins Co	842	ID	Yes	Yes
47783	Vision Serv Plan of ID Inc	1189	ID	Yes	No
47791	Delta Dental Plan of ID Inc		ID	No	No
60095	Blue Cross of ID Hlth Serv Inc		ID	No	No
60131	Regence Blueshield Of ID Inc	1207	ID	Yes	No
63983	United Heritage Life Ins Co	2878	ID	Yes	No
95819	Willamette Dental of ID Inc	3503	ID	Yes	No
10031	American Heartland Ins Co	167	IL	Yes	No
10071	Encompass Ins Co Of Amer	8	IL	Yes	No
10072	Encompass Prop & Cas Co	8	IL	Yes	No
10074	Martingale Natl Ins Co	3526	IL	Yes	No
10200	Hiscox Ins Co Inc	4666	IL	Yes	No
10213	Discover Specialty Ins Co	3548	IL	Yes	No
10217	Triad Guar Assur Corp	421	IL	Yes	No
10222	PACO Assur Co Inc	2698	IL	Yes	No
10226	Unitrin Direct Ins Co	215	IL	Yes	No
10324	Addison Ins Co	248	IL	Yes	Yes
10343	Apollo Cas Co	3501	IL	Yes	No
10358	Encompass Ins Co	8	IL	Yes	No
10655	Unique Ins Co		IL	No	No
10657	First Mercury Ins Co	3617	IL	Yes	No
10658	National Heritage Ins Co		IL	No	No
10659	Diamond Ins Co		IL	No	No
10713	Third Coast Ins Co	572	IL	Yes	Yes
10730	American Access Cas Co		IL	No	No
10751	NHRMA Mut Ins Co		IL	No	No
10801	Fortress Ins Co	508	IL	Yes	Yes
10806	Farmers New Century Ins Co	212	IL	Yes	No
10835	Castle Key Ind Co	8	IL	Yes	No
10852	Allstate NJ Ins Co	8	IL	Yes	No
10859	First Nonprofit Ins Co	4675	IL	Yes	No
10864	American Freedom Ins Co		IL	No	No
10891	CEM Ins Co		IL	No	No
10895	Midwest Ins Co		IL	No	No
10914	Kemper Independence Ins Co	215	IL	Yes	No
10915	Unitrin Direct Prop & Cas Co	215	IL	Yes	No
10956	Guilford Ins Co	479	IL	Yes	No
10957	Alamance Ins Co	479	IL	Yes	No
11016	Homesite Ins Co Of IL	501	IL	Yes	No
11084	ISMIE Ind Co	2358	IL	Yes	Yes
11110	Allstate N Amer Ins Co	8	IL	Yes	No

11123	Safety First Ins Co	74	IL	Yes	No
11142	United Cas Ins Co Of Amer	215	IL	Yes	No
11177	First Fin Ins Co	479	IL	Yes	No
11218	NeHi Re LP		IL	No	No
11221	First Commonwealth Ltd Hlth Serv Cor	429	IL	Yes	Yes
11223	Safeway Ins Co Of AL	257	IL	Yes	No
11228	Compbenefits Dental Inc	119	IL	Yes	No
11229	Harmony Hlth Plan of IL Inc	1199	IL	Yes	No
11251	Encompass Independent Ins Co	8	IL	Yes	No
11252	Encompass Home & Auto Ins Co	8	IL	Yes	No
11261	Olympia Ltd Hlth Serv Org		IL	No	No
11568	Constitutional Cas Co		IL	No	No
11599	Encompass Ins Co of NJ	8	IL	Yes	No
11622	Specialty Surplus Ins Co	108	IL	Yes	Yes
11702	Echelon Prop & Cas Ins Co		IL	Yes	No
11861	Medical Alliance Ins Co		IL	Yes	No
11862	Delphi Cas Co	3501	IL	Yes	No
11993	Encompass Floridian Ins Co	8	IL	Yes	No
11996	Encompass Floridian Ind Co	8	IL	Yes	No
12231	UnitedHealthcare Ins Co of the River	707	IL	Yes	No
12251	State Farm Guar Ins Co	176	IL	Yes	Yes
12344	Allstate NJ Prop & Cas Ins Co	8	IL	Yes	No
12496	Encompass Prop & Cas Ins Co of NJ	8	IL	Yes	No
12516	Vision Serv Plan of IL NFP	1189	IL	Yes	No
12521	Safeway Ins Co	257	IL	Yes	No
12588	Prime Ins Co		IL	No	No
12721	Direct Auto Ins Co		IL	No	No
12843	Doctors Direct Ins Inc		IL	No	No
12844	National Dental Care Inc		IL	No	No
12987	Benefit Security Ins Co		IL	No	No
13017	US Ins Co of Amer		IL	No	No
13056	RLI Ins Co	783	IL	Yes	No
13167	North Light Specialty Ins Co	8	IL	Yes	No
13187	Titan Prop & Cas Ins Co	309	IL	Yes	Yes
13189	Meridian Hlth Plan Inc	4640	IL	Yes	No
13358	American Mut Reins Co		IL	No	No
13578	Hiscox Specialty Ins Co Inc	4666	IL	Yes	No
13587	First Chicago Ins Co		IL	Yes	No
13604	Starr Surplus Lines Ins Co	4670	IL	Yes	No
13660	Transit General Ins Co		IL	No	No
13752	American Alliance Cas Co		IL	No	No
13978	Florists Mut Ins Co	349	IL	Yes	Yes
14249	Founders Ins Co	178	IL	Yes	No
14443	Madison Mut Ins Co		IL	No	No
14460	Podiatry Ins Co Of Amer	2698	IL	Yes	No
14583	Millers First Ins Co	855	IL	Yes	No
15130	Encompass Ind Co	8	IL	Yes	No
15199	Standard Mut Ins Co		IL	No	No
15385	OneCIS Ins Co		IL	Yes	No
15440	Financial Benefits Ins Co	3384	IL	Yes	No
15563	SeaBright Ins Co		IL	Yes	No
15571	Illinois Cas Co A Mut Co		IL	No	No
15792	Underwriters At Lloyds London		IL	No	No
17230	Allstate Prop & Cas Ins Co	8	IL	Yes	No
17248	Safeway Prop Ins Co	257	IL	Yes	No
17400	Noetic Specialty Ins Co	1113	IL	Yes	Yes
18333	Peerless Ind Ins Co	111	IL	Yes	No
18750	Merit Hlth Ins Co	1260	IL	Yes	No
19224	St Paul Protective Ins Co	3548	IL	Yes	No
19232	Allstate Ins Co	8	IL	Yes	No
19240	Allstate Ind Co	8	IL	Yes	No
19780	Springfield Fire & Cas Co		IL	No	No
19801	Argonaut Ins Co	457	IL	Yes	No
19828	Argonaut Midwest Ins Co	457	IL	Yes	No
19836	Select Markets Ins Co	457	IL	Yes	No
19844	Argonaut SW Ins Co	457	IL	Yes	No
19860	Argonaut Great Central Ins Co	457	IL	Yes	No
19984	ACIG Ins Co	594	IL	Yes	No
20095	Bituminous Cas Corp	150	IL	Yes	No
20109	Bituminous Fire & Marine Ins Co	150	IL	Yes	No
20133	Response Worldwide Direct Auto Ins C	215	IL	Yes	No
20443	Continental Cas Co	218	IL	Yes	No
20451	Midstates Reins Corp		IL	No	No
20478	National Fire Ins Co Of Hartford	218	IL	Yes	No
20494	Transportation Ins Co	218	IL	Yes	No

20982	Country Cas Ins Co	50	IL	Yes	No
20990	Country Mut Ins Co	50	IL	Yes	No
21008	Country Pref Ins Co	50	IL	Yes	No
21679	Illinois Farmers Ins Co	212	IL	Yes	No
21881	National Surety Corp	761	IL	Yes	No
22578	Horace Mann Ins Co	300	IL	Yes	No
22683	Teachers Ins Co	300	IL	Yes	No
22810	Chicago Ins Co	761	IL	Yes	No
22829	Interstate Fire & Cas Co	761	IL	Yes	No
22837	AGCS Marine Ins Co	761	IL	Yes	No
22918	American Motorists Ins Co	108	IL	Yes	Yes
22926	Economy Fire & Cas Co	241	IL	Yes	No
22950	Acstar Ins Co		IL	No	No
22977	Lumbermens Mut Cas Co	108	IL	Yes	Yes
23655	Modern Serv Ins Co	50	IL	Yes	No
23817	Illinois Natl Ins Co	12	IL	Yes	No
24139	Old Republic Gen Ins Corp	150	IL	Yes	No
24201	Farmers Automobile Ins Assoc	153	IL	Yes	No
24228	Pekin Ins Co	153	IL	Yes	No
24350	Triad Guar Ins Corp	421	IL	Yes	No
24376	American Gen Ind Co	12	IL	Yes	No
24910	United Equitable Ins Co	167	IL	Yes	No
25143	State Farm Fire & Cas Co	176	IL	Yes	Yes
25151	State Farm Gen Ins Co	176	IL	Yes	Yes
25178	State Farm Mut Auto Ins Co	176	IL	Yes	Yes
25828	American Union Ins Co		IL	No	No
26077	Lancer Ins Co	456	IL	Yes	No
26085	Warner Ins Co	215	IL	Yes	No
26409	Argonaut Ltd Risk Ins Co	457	IL	Yes	No
26433	Harco Natl Ins Co	225	IL	Yes	No
26549	Reinsurance Co Of Amer Inc	3384	IL	Yes	No
26620	AXIS Surplus Ins Co	3416	IL	Yes	No
26700	Insurance Co Of IL	111	IL	Yes	No
26735	Mount Carroll Mut Fire Ins Co		IL	No	No
26883	Chartis Specialty Ins Co	12	IL	Yes	No
27065	Rockford Mut Ins Co		IL	No	No
27081	Bond Safeguard Ins Co	3488	IL	Yes	No
27138	Kemper Cas Ins Co	108	IL	Yes	Yes
27189	Associated Intl Ins Co	785	IL	Yes	No
27855	Zurich Amer Ins Co Of IL	212	IL	Yes	No
27928	Amex Assur Co		IL	Yes	No
27960	Illinois Union Ins Co	626	IL	Yes	No
27988	Mercury Natl Ins Co	660	IL	Yes	No
28134	Lutheran Mut Fire Ins Co		IL	No	No
28497	Usplate Glass Ins Co		IL	No	No
28860	RLI Ind Co	783	IL	Yes	No
28886	Transguard Ins Co Of Amer Inc	225	IL	Yes	No
29688	Allstate Fire & Cas Ins Co	8	IL	Yes	No
29831	Independent Mut Fire Ins Co		IL	No	No
30015	Centaur Ins Co IN REHAB	674	IL	Yes	No
30511	Castle Key Ins Co	8	IL	Yes	No
30562	American Manufacturers Mut Ins Co	108	IL	Yes	Yes
30872	Amerin Guar Corp	766	IL	Yes	No
31127	Columbia Cas Co	218	IL	Yes	No
31143	Old Republic Union Ins Co	150	IL	Yes	No
32077	Heritage Cas Ins Co	350	IL	Yes	No
32921	ISMIE Mut Ins Co	2358	IL	Yes	Yes
32964	American Medical Assur Co		IL	Yes	No
33278	Florists Ins Co	349	IL	Yes	Yes
33588	First Liberty Ins Corp	111	IL	Yes	No
33600	LM Ins Corp	111	IL	Yes	No
33715	Old Republic Mercantile Ins Co	150	IL	Yes	No
34444	Mercury Ins Co Of IL	660	IL	Yes	No
34940	Omni Ind Co	3678	IL	Yes	No
35378	Evanston Ins Co	785	IL	Yes	No
36439	LM Personal Ins Co	111	IL	Yes	No
36447	LM Gen Ins Co	111	IL	Yes	No
36455	Northbrook Ind Co	8	IL	Yes	No
36463	Discover Prop & Cas Ins Co	3548	IL	Yes	No
37036	Governmental Interins Exch		IL	No	No
37184	Deerfield Ins Co	785	IL	Yes	No
37273	Axis Ins Co	3416	IL	Yes	No
37907	Deerbrook Ins Co	8	IL	Yes	No
37974	MT Hawley Ins Co	783	IL	Yes	No
38067	Economy Preferred Ins Co	241	IL	Yes	No

38237	American Country Ins Co	1326	IL	Yes	No
38288	Hartford Ins Co Of IL	91	IL	Yes	No
38806	Insura Prop & Cas Ins Co	3596	IL	Yes	No
38970	Markel Ins Co	785	IL	Yes	No
39012	Safeco Ins Co Of IL	111	IL	Yes	No
39098	Omni Ins Co	3678	IL	Yes	No
40134	Castlepoint Natl Ins Co		IL	Yes	No
40142	American Zurich Ins Co	212	IL	Yes	No
40398	American Fuji Fire & Marine Ins Co		IL	Yes	No
40649	Economy Premier Assur Co	241	IL	Yes	No
40827	Virginia Surety Co Inc	4254	IL	Yes	No
41068	National Fire & Cas Co		IL	Yes	No
41343	HDI Gerling Amer Ins Co	517	IL	Yes	No
42404	Liberty Ins Corp	111	IL	Yes	No
42609	Affirmative Ins Co	3596	IL	Yes	No
42862	Universal Cas Co	1326	IL	Yes	No
42870	Heartland Ins Co Of Amer		IL	No	No
42897	American Serv Ins Co Inc	1326	IL	Yes	No
42927	Illinois State Bar Assn Mut Ins Co		IL	No	No
42951	MSI Preferred Ins Co	50	IL	Yes	No
43044	Response Ins Co	215	IL	Yes	No
43796	State Farm Ind Co	176	IL	Yes	Yes
44121	Oms Natl Ins Co Rrg	508	IL	Yes	Yes
47589	Delta Dental of IL	115	IL	Yes	Yes
47600	American Dentaplans Ltd		IL	No	No
47627	Woodward Governor Co Hlth Serv Inc		IL	No	No
52028	Dental Concern Ltd	119	IL	Yes	No
52053	DENTAL BENEFIT PROVIDERS OF IL INC	707	IL	Yes	No
52553	Union Hlth Serv Inc		IL	No	No
54127	Union Medical Center		IL	No	No
54259	Sidney Hillman Hlth Centre		IL	No	No
56138	CSA Fraternal Life		IL	No	No
56227	KSKJ Life Amer Slovenian Catholic Un		IL	No	No
57487	Catholic Order Of Foresters		IL	No	No
57509	Independent Order Of Vikings		IL	No	No
57525	Grand Lodge Knights Of Pythias		IL	No	No
57541	Modern Woodmen Of Amer		IL	No	No
57568	National Catholic Soc Of Foresters		IL	No	No
57606	Order Sons Of Italy In Amer Il		IL	No	No
57622	Polish Natl Alliance Us Of Na		IL	No	No
57630	Polish Roman Catholic Union Of Amer		IL	No	No
57649	Polish Womens Alliance Of Amer		IL	No	No
57657	Royal Neighbors Of Amer		IL	No	No
57711	Western Catholic Union		IL	No	No
57754	Firemans Mut Aid & Benefit Assn		IL	No	No
57770	Catholic Holy Family Society		IL	No	No
60052	Humana Benefit Plan of IL Inc	119	IL	Yes	No
60186	Allstate Life Ins Co	8	IL	Yes	No
60208	Amalgamated Life & Hlth Ins Co		IL	Yes	No
60239	First Commonwealth Ins Co	429	IL	Yes	Yes
60318	United Hlthcare Ins Co Of IL	707	IL	Yes	No
60682	Conseco Ins Co	233	IL	Yes	No
61263	Bankers Life & Cas Co	233	IL	Yes	No
61425	Trustmark Ins Co	276	IL	Yes	No
61506	Resource Life Ins Co	4254	IL	Yes	No
61808	Charter Natl Life Ins Co	8	IL	Yes	No
62146	Combined Ins Co Of Amer	626	IL	Yes	No
62413	Continental Assur Co	218	IL	Yes	No
62553	Country Life Ins Co	50	IL	Yes	No
62596	Union Fidelity Life Ins Co	350	IL	Yes	No
62790	Allegiance Life Ins Co	300	IL	Yes	No
62863	Trustmark Life Ins Co	276	IL	Yes	No
63223	Federal Life Ins Co		IL	No	No
63290	Fidelity Life Assn A Legal Reserve L		IL	Yes	No
64211	Guarantee Trust Life Ins Co	687	IL	Yes	No
64467	Wellcare Hlth Ins of IL Inc	1199	IL	Yes	No
64513	Horace Mann Life Ins Co	300	IL	Yes	No
64580	Illinois Mut Life Ins Co		IL	No	No
65927	Lincoln Heritage Life Ins Co		IL	No	No
66427	MTL Ins Co		IL	Yes	No
67083	Manhattan Natl Life Ins Co	84	IL	Yes	No
67261	Old Republic Life Ins Co	150	IL	Yes	No
67628	Pekin Life Ins Co	153	IL	Yes	No
68063	Professional Life & Cas Co		IL	No	No
68373	American Gen Assur Co	12	IL	Yes	No

68381	Reliance Standard Life Ins Co	74	IL	Yes	No
68519	Physicians Benefits Trust Life Ins		IL	Yes	Yes
69094	State Farm Life & Accident Asr Co	176	IL	Yes	Yes
69108	State Farm Life Ins Co	176	IL	Yes	Yes
69930	United Ins Co Of Amer	215	IL	Yes	No
70319	Washington Natl Ins Co	233	IL	Yes	No
70670	Health Care Serv Corp A Mut Legal Re	917	IL	Yes	No
70700	Unicare Hlth Ins Co Of The Midwest	671	IL	Yes	No
70866	Allstate Assur Co	8	IL	Yes	No
71129	Fort Dearborn Life Ins Co	917	IL	Yes	No
74160	Personalcare Ins Of IL Inc	1137	IL	Yes	No
75027	Life Assur Co Of Amer		IL	No	No
76023	Columbian Life Ins Co	535	IL	Yes	Yes
77399	Sterling Life Ins Co	361	IL	Yes	No
77950	Health Alliance Medical Plans	1192	IL	Yes	No
78611	HCSC Ins Serv Co	917	IL	Yes	No
80799	Celtic Ins Co	1295	IL	Yes	No
80985	BCS Life Ins Co	23	IL	Yes	No
81108	United Security Life & Hlth Ins Co		IL	Yes	No
83640	Rightchoice Ins Co	671	IL	Yes	No
84158	American Life Ins Co		IL	No	No
84174	Employees Life Co Mut		IL	No	No
84220	Interstate Bankers Life Ins Co		IL	No	No
84697	American Specialty Hlth Ins Co	3502	IL	Yes	No
87718	Concert Hlth Plan Ins Co		IL	No	No
88080	XL Life Ins & Ann Co	1285	IL	Yes	No
89003	Destiny Hlth Ins Co		IL	Yes	No
90557	Kemper Investors Life Ins Co	212	IL	Yes	No
92525	TruAssure Ins Co	115	IL	Yes	Yes
92703	United Natl Life Ins Co Of Amer	687	IL	Yes	No
94218	Country Investors Life Assur Co	50	IL	Yes	No
94498	State Farm Ann & Life Ins Co	176	IL	Yes	Yes
95378	UnitedHealthcare Plan of the River V	707	IL	Yes	No
95505	UNICARE Hlth Plans of the Midwest	671	IL	Yes	No
95513	Health Alliance Midwest Inc	1192	IL	Yes	No
95602	Cigna Hlthcare of IL Inc	901	IL	Yes	No
95776	UnitedHealthcare of IL Inc	707	IL	Yes	No
96458	Total Hlth Care Inc		IL	No	No
96814	BCI Hmo Inc	917	IL	Yes	No
10052	Chubb Natl Ins Co	38	IN	Yes	No
10061	Infinity Ind Ins Co	3495	IN	Yes	No
10068	Hillstar Ins Co	3495	IN	Yes	No
10103	American Agricultural Ins Co		IN	No	No
10142	CareSource IN	3683	IN	Yes	No
10282	Midwestern Equity Title Ins Co		IN	No	No
10395	Citizens Ins Co Of The Midwest	88	IN	Yes	No
10502	Meridian Citizens Mut Ins Co	175	IN	Yes	Yes
10644	Victoria Automobile Ins Co	140	IN	Yes	Yes
10648	Geneva Ins Co		IN	No	No
10921	ACA Ins Co	1278	IN	Yes	Yes
10922	Insuremax Ins Co		IN	No	No
11087	Lone Star Natl Ins Co	246	IN	Yes	No
11089	National Building Material Assur Co	246	IN	Yes	No
11215	Safeco Ins Co Of IN	111	IN	Yes	No
11445	United Natl Cas Ins Co	920	IN	Yes	No
11446	Quanta Specialty Lines Ins Co	3496	IN	Yes	No
11502	State Auto FL Ins Co	175	IN	Yes	Yes
11821	Vantage Cas Ins Co	304	IN	Yes	No
11829	Integrity Capital Ins Co	612	IN	Yes	No
11843	Medical Protective Co	31	IN	Yes	No
11865	Arsenal Ins Corp		IN	No	No
11894	Merchants Prop Ins Co of IN		IN	No	No
12084	American Professionals Ins Co	1116	IN	Yes	No
12331	PHP Ins Co of IN Inc	3828	IN	Yes	Yes
12416	Protective Ins Co	867	IN	Yes	No
12540	NHP of IN LLC	4032	IN	Yes	No
12599	Infinity Standard Ins Co	3495	IN	Yes	No
13149	Protective Specialty Ins Co	867	IN	Yes	No
13164	Clarian Hlth Plans Inc	4637	IN	Yes	No
13528	Brotherhood Mut Ins Co		IN	No	No
13661	Affiliates Ins Co		IN	No	No
13893	Community Blood Cntr Exch RRG		IN	No	No
14265	Indiana Lumbermens Mut Ins Co	246	IN	Yes	No
15288	United Farm Family Mut Ins Co	542	IN	Yes	No
15814	Growers Automobile Ins Assoc		IN	No	No

15822	Home Mut Ins Co		IN	No	No
17639	Home & Farm Ins Co	46	IN	Yes	Yes
19259	Selective Ins Co Of SC	242	IN	Yes	No
19690	American Economy Ins Co	111	IN	Yes	No
19704	American States Ins Co	111	IN	Yes	No
20260	Infinity Select Ins Co	3495	IN	Yes	No
20281	Federal Ins Co	38	IN	Yes	No
20303	Great Northern Ins Co	38	IN	Yes	No
21296	Max Amer Ins Co	4636	IN	Yes	No
22098	Grain Dealers Mut Ins Co	311	IN	Yes	No
22268	Infinity Ins Co	3495	IN	Yes	No
22624	Indiana Farmers Mut Ins Co		IN	No	No
22640	Consolidated Ins Co	111	IN	Yes	No
22659	Indiana Ins Co	111	IN	Yes	No
23353	Meridian Security Ins Co	175	IN	Yes	Yes
23868	UFB Cas Ins Co	542	IN	Yes	No
25208	Statesman Ins Co	1116	IN	Yes	No
26220	Yosemite Ins Co	12	IN	Yes	No
26417	Ace Ins Co Of The Midwest	626	IN	Yes	No
26654	Great Northwest Ins Co	4576	IN	Yes	No
27570	Hoosier Ins Co	796	IN	Yes	No
27944	National Ins Assn	111	IN	Yes	No
27952	Hoosier Motor Mut Ins Co		IN	No	No
28207	Anthem Ins Co Inc	671	IN	Yes	No
28380	Agri Ins Exch Rrg		IN	No	No
29424	Hartford Cas Ins Co	91	IN	Yes	No
29459	Twin City Fire Ins Co Co	91	IN	Yes	No
29572	Pafco Gen Ins Co	407	IN	Yes	No
29629	Namic Ins Co Inc		IN	Yes	No
29777	Indiana Truckers Exch		IN	Yes	No
31020	Employers Protective Ins Co		IN	Yes	No
31380	American Surety Co		IN	No	No
31402	American Medical Ins Exch	2698	IN	Yes	No
31968	Merastar Ins Co	215	IN	Yes	No
32005	Employers Security Ins Co	3158	IN	Yes	No
32352	LM Prop & Cas Ins Co	111	IN	Yes	No
32506	Monroe Guar Ins Co	474	IN	Yes	No
32867	Universal Fire & Cas Ins Co		IN	No	No
32905	Property Owners Ins Co	280	IN	Yes	Yes
34690	Property & Cas Ins Co Of Hartford	91	IN	Yes	No
36781	HCC Ins Co	984	IN	Yes	No
37001	Infinity Premier Ins Co	3495	IN	Yes	No
37214	American States Preferred Ins Co	111	IN	Yes	No
37478	Hartford Ins Co Of The Midwest	91	IN	Yes	No
37770	Western United Ins Co	1278	IN	Yes	Yes
38784	Progressive Southeastern Ins Co	155	IN	Yes	No
38873	Infinity Security Ins Co	3495	IN	Yes	No
39926	Selective Ins Co Of The Southeast	242	IN	Yes	No
40088	American Inter Fidelity Exch RRG		IN	No	No
40460	Sagamore Ins Co	867	IN	Yes	No
40517	Advantage Workers Comp Ins Co		IN	No	No
42048	Diamond State Ins Co	920	IN	Yes	No
42781	Direct Gen Ins Co	1213	IN	Yes	No
44393	West Amer Ins Co	111	IN	Yes	No
44695	Progressive Paloverde Ins Co	155	IN	Yes	No
50172	General Title Ins Co		IN	No	No
50938	National Attorney Title Assur Fund I	750	IN	Yes	No
51381	Dreibelbiss Title Co Inc		IN	No	No
52050	Indiana Vision Serv Inc	1189	IN	Yes	No
52568	Advantage Hlth Solutions Inc		IN	No	No
52623	American Hlth Ntwrk of IN LLC		IN	Yes	No
52634	Delta Dental Plan of IN	477	IN	Yes	No
57991	Mennonite Mut Aid Assn	4616	IN	Yes	Yes
58009	Police & Firemens Ins Assn		IN	No	No
60577	American Income Life Ins Co	290	IN	Yes	No
60895	American United Life Ins Co	619	IN	Yes	No
61069	Anthem Life Ins Co	671	IN	Yes	No
61700	Renaissance Life & Hlth Ins Co of Am	477	IN	Yes	No
62286	Golden Rule Ins Co	707	IN	Yes	No
64076	Great Fidelity Life Ins Co	863	IN	Yes	No
65242	Lafayette Life Ins Co	836	IN	Yes	No
65676	Lincoln Natl Life Ins Co	20	IN	Yes	No
65900	Conseco Life Ins Co	233	IN	Yes	No
65951	Merit Life Ins Co	12	IN	Yes	No
66109	Midwestern United Life Ins Co	229	IN	Yes	No

66214	Heartland Natl Life Ins Co		IN	Yes	No
67369	Alta Hlth & Life Ins Co	901	IN	Yes	No
67652	First Penn Pacific Life Ins Co	20	IN	Yes	No
69051	Standard Life Ins Co Of IN		IN	Yes	No
69116	State Life Ins Co	619	IN	Yes	No
69892	United Farm Family Life Ins Co	542	IN	Yes	No
69922	United Home Life Ins Co	542	IN	Yes	No
70211	Reassure Amer Life Ins Co	181	IN	Yes	No
70785	Pacificare Life & Hlth Ins Co	707	IN	Yes	No
70955	USA Life One Ins Co Of IN		IN	No	No
73180	Somerset Life Ins Co		IN	No	No
74209	MMA Ins Co	4616	IN	Yes	Yes
80314	Unicare Life & Hlth Ins Co	671	IN	Yes	No
82406	All Savers Ins Co	707	IN	Yes	No
85286	OneNation Ins Co	671	IN	Yes	No
91642	Forethought Life Ins Co	1266	IN	Yes	No
92711	HCC Life Ins Co	984	IN	Yes	No
94587	Members Hlth Ins Co	4677	IN	Yes	No
95436	Physicians Hlth Plan of N IN Inc	3828	IN	Yes	Yes
95444	M Plan Inc	4637	IN	Yes	No
95525	Cigna Hltcare of IN Inc	901	IN	Yes	No
95807	MDwise Inc	4637	IN	Yes	No
95812	Southeastern IN Hlth Organization		IN	Yes	No
95831	Coordinated Care Corp IN Inc	1295	IN	Yes	No
96687	Health Resources Inc		IN	No	No
10235	American Southern Ins Co	587	KS	Yes	No
10323	Farmers Mut Ins Co		KS	No	No
10696	Travel Air Ins Co Ltd	1205	KS	Yes	No
10951	Independence Ind Ins Co	711	KS	Yes	No
11118	Federated Rural Electric Ins Exch		KS	Yes	No
11878	MutualAid eXchange		KS	Yes	No
12143	Advance Ins Co of KS	430	KS	Yes	Yes
12805	Unicare Hlth Plan of KS Inc	671	KS	Yes	No
12939	Town & Country Fire & Cas Ins Co		KS	No	No
12966	Key Ins Co		KS	Yes	No
12969	ValueOptions of KS Inc	965	KS	Yes	No
13126	Midwest Builders Cas Mut Co		KS	No	No
13175	Surency Life & Hlth Ins Co	4638	KS	Yes	Yes
14362	Kansas Mut Ins Co		KS	No	No
14451	Marysville Mut Ins Co		KS	No	No
15296	Upland Mut Ins Inc		KS	No	No
15881	Bremen Farmers Mut Ins Co		KS	No	No
15954	AmTrust Ins Co of KS Inc	2538	KS	Yes	No
15962	Kansas Bankers Surety Co	31	KS	Yes	No
19186	Alliance Ins Co Inc	214	KS	Yes	Yes
19194	Farmers Alliance Mut Ins Co	214	KS	Yes	Yes
20419	Homesite Ind Co	501	KS	Yes	No
21628	Farmers Ins Co Inc	212	KS	Yes	No
33154	Alliance Ind Co	214	KS	Yes	Yes
34703	Kansas Medical Mut Ins Co		KS	No	No
37060	Old United Cas Co	697	KS	Yes	No
40584	Travel Air Ins Co KS	1205	KS	Yes	No
41181	Universal Underwriters Ins Co	212	KS	Yes	No
41394	Benchmark Ins Co		KS	Yes	No
41459	Armed Forces Ins Exch		KS	Yes	No
52024	Cigna Dental Hlth of KS Inc	901	KS	Yes	No
54615	Delta Dental Plan of KS Inc	4638	KS	Yes	Yes
60110	Preferred Hlth Systems Ins Co	1137	KS	Yes	No
60542	American Home Life Ins Co		KS	No	No
68276	Employers Reassur Corp	350	KS	Yes	No
68284	Pyramid Life Ins Co	953	KS	Yes	No
68675	Security Benefit Life Ins Co	870	KS	Yes	No
70173	Universal Underwriters Life Ins Co	212	KS	Yes	No
70408	Union Security Ins Co	19	KS	Yes	No
70729	BCBS Of KS Inc	430	KS	Yes	Yes
71455	Cardif Life Ins Co	3764	KS	Yes	No
95390	Preferred Plus Of KS Inc	1137	KS	Yes	No
95489	Coventry Hlth Care of KS Inc	1137	KS	Yes	No
10320	Kentucky Employers Mut Ins		KY	No	No
10356	Planters Ins Co Inc		KY	No	No
11133	Kentucky Funeral Directors Life Ins	801	KY	Yes	No
11665	Citizens Ins Co Inc	1310	KY	Yes	No
11854	Healthcare Underwriters Grp of KY		KY	No	No
11872	Kentuckiana Medical Recip RRG		KY	No	No
11939	Kentucky Hospital Ins Co RRG		KY	No	No

12214	Baltas Vision LLC		KY	No	No
13018	Doctors & Surgeons Natl RRG Inc		KY	Yes	No
13580	ARISE Boiler Inspection & Ins Co RRG		KY	No	No
13611	CMD Hlth Inc		KY	No	No
22993	Kentucky Farm Bur Mut Ins Co	109	KY	Yes	Yes
23000	FB Ins Co	109	KY	Yes	Yes
24520	Lawyers Mut Ins Co Of KY		KY	No	No
29149	Kentucky Natl Ins Co		KY	Yes	No
32727	Underwriters At Lloyds		KY	No	No
42714	DR Ins Co		KY	Yes	No
48127	Dental Choice Inc		KY	Yes	No
52048	UNITED CONCORDIA DENTAL PLANS OF KY	812	KY	Yes	Yes
52108	Cigna Dental Hlth of KY Inc	901	KY	Yes	No
52621	University Hlth Care Inc		KY	No	No
54674	Delta Dental of KY Inc		KY	No	No
54739	The Dental Concern Inc	119	KY	Yes	No
60219	Humana Ins Co Of KY	119	KY	Yes	No
60242	Southern Financial Life Ins Co	17	KY	Yes	No
60244	Kentucky Home Life Ins Co		KY	Yes	No
60666	American Life & Acc Ins Co Of KY		KY	Yes	No
61921	Citizens Security Life Ins Co	1310	KY	Yes	No
64904	Investors Heritage Life Ins Co		KY	Yes	No
95071	Bluegrass Family Hlth Inc		KY	Yes	No
95120	Anthem Hlth Plans Of KY Inc	671	KY	Yes	No
95158	CHA Hmo Inc	119	KY	Yes	No
95885	Humana Hlth Plan Inc	119	KY	Yes	No
96644	United Hlthcare of KY Ltd	707	KY	Yes	No
-	American Mutual Fire Insurance Company of KY		KY	No	No
-	Falls City Mutual Insurance Company Inc.		KY	No	No
-	Farmers Co-Operative Insurance Company		KY	No	No
-	Farmers Home Mutual Aid Association of Fleming County		KY	No	No
-	Farmers' Mutual Fire Insurance Co. of Boone Co.		KY	No	No
-	Farmers Mutual Insurance Company of Mason County		KY	No	No
-	Gallatin Co. Assessment F W and L Insurance Company		KY	No	No
-	Hancock County Assessment or Co-Operative Insurance Company		KY	No	No
-	Hurst Home Insurance Company Inc.		KY	No	No
-	Kenton County Assessment Fire Insurance Company		KY	No	No
-	Kentucky Growers Insurance Company Inc.		KY	No	No
-	Kentucky Mutual Insurance Company		KY	No	No
-	Northern Kentucky Home Insurance Company (f/k/a Campbell Co.)		KY	No	No
-	Pendleton County Farmers Fire Insurance Company Inc.		KY	No	No
-	Planters Cooperative Insurance Company Inc.		KY	No	No
-	Washington Mutual Fire Insurance Assn. Inc.		KY	No	No
-	Kentucky Association of Counties-All Lines Fund - Liability		KY	No	No
-	Kentucky Municipal Risk Management Association - KLC Insurance :		KY	No	No
-	Kentucky School Boards Insurance Trust - Liability		KY	No	No
-	Kentucky Housing Authority Self-Insurance Fund - Liability (fiscal)		KY	No	No
-	Louisville Area Governmental Self Insurance Trust - Liability		KY	No	No
-	Kentucky Association of Counties Workers Comp Fund		KY	No	No
-	Kentucky League of Cities Workers Comp Fund		KY	No	No
-	Kentucky Retail Federation Self Insured Fund		KY	No	No
-	Forest Industry Workers' Compensation Fund		KY	No	No
-	Kentucky School Boards Insurance Trust Workers Comp Fund		KY	No	No
-	KESA, The KY Workers Comp Fund		KY	No	No
-	KY Associated General Contractors Self Insured Fund		KY	No	No
-	Automobile Dealers Management Insurance Company		KY	Yes	No
-	Beckett National Insurance Company		KY	Yes	No
-	Corona Casualty & Indemnity, Ltd.		KY	Yes	No
-	Fourthandone Insurance Company, Inc		KY	Yes	No
-	Harvest Insurance Company, LLC		KY	Yes	No
-	Knova National Insurance Company		KY	Yes	No
-	New Sun Insurance Limited		KY	Yes	No
-	Shamrock Casualty & Indemnity, Limited		KY	Yes	No
-	Spring Grove National Insurance Company		KY	Yes	No
-	Sunshine Casualty & Indemnity, Limited		KY	Yes	No
-	Bay Insurance Company, LLC		KY	Yes	No
-	Amselect Insurance Company, Inc		KY	Yes	No
-	SI Risk Solutions, Inc.		KY	Yes	No
-	Appliance National Casualty & Indemnity, Limited		KY	Yes	No
-	Saratoga Insurance Company, Inc.		KY	Yes	No
-	Yorkshire Insurance Company		KY	Yes	No
-	Cross Island Insurance Company		KY	Yes	No
-	FFKT Insurance Services, Inc.		KY	Yes	No
-	Global Fidelity Insurance Company		KY	Yes	No
-	Hastings Insurance Company		KY	Yes	No

-	Ohio Valley Casualty & Indemnity, Limited	KY	Yes	No
-	Oswald Indemnity, Inc.	KY	Yes	No
-	Premier Platinum Insurance Group, Inc.	KY	Yes	No
-	Procedant Insurance Company of Kentucky	KY	Yes	No
-	Rivada Insurance Company	KY	Yes	No
-	Sierra Insurance Company	KY	Yes	No
-	SL Insurance Company	KY	Yes	No
-	Terrace National Insurance Company	KY	Yes	No
-	Traders Global Insurance Company	KY	Yes	No
-	VentureSure, Inc	KY	Yes	No
-	BFB Insurance Company, Inc.	KY	Yes	No
-	BRS Casualty & Indemnity, Limited	KY	Yes	No
-	G & L Casualty & Indemnity, Limited	KY	Yes	No
-	L&G Casualty & Indemnity, Limited	KY	Yes	No
-	SCH Insurance Company, Inc.	KY	Yes	No
-	SRB Casualty & Indemnity, Limited	KY	Yes	No
-	Commonwealth Insurance Company, Inc.	KY	Yes	No
-	BAM Insurance Group, Inc	KY	Yes	No
-	Bevelled Edge Insurance Company	KY	Yes	No
-	Care Mutual Insurance, Inc.	KY	Yes	No
-	Crestview National Insurance Company	KY	Yes	No
-	DAB Insurance Company, Inc.	KY	Yes	No
-	Eisenhower Insurance Company	KY	Yes	No
-	Fair Chase Insurance, Inc.	KY	Yes	No
-	Idaho Medical Insurance Company	KY	Yes	No
-	Jackson Insurance Company	KY	Yes	No
-	MedCap Insurance Company	KY	Yes	No
-	MU Insurance Company	KY	Yes	No
-	National SNF Insurance Company	KY	Yes	No
-	Reagan Insurance Company	KY	Yes	No
-	Truman Insurance Company	KY	Yes	No
-	AERO Insurance Group, Inc.	KY	Yes	No
-	CVE Insurance Company	KY	Yes	No
-	Ekkebus Heritage Insurance Company, Inc.	KY	Yes	No
-	Gateway Captive Insurance Company	KY	Yes	No
-	Hart Heritage Insurance Company, Inc.	KY	Yes	No
-	ICI Insurance Company	KY	Yes	No
-	Jameson Insurance Inc.	KY	Yes	No
-	Koman Insurance Company	KY	Yes	No
-	Pipeline Insurance Company, LLC	KY	Yes	No
-	Ratable Insurance Company, LLC	KY	Yes	No
-	SSD Insurance Company	KY	Yes	No
-	Gray Hawk Insurance Company	KY	Yes	No
-	CISV International Insurance Company	KY	Yes	No
-	Monaco Insurance Company	KY	Yes	No
-	CarRoga Insurance Company	KY	Yes	No
-	DBB Insurance Services, Inc	KY	Yes	No
-	Developers National Insurance Company	KY	Yes	No
-	Emerald Isle Insurance Company, Inc.	KY	Yes	No
-	Flatiron Insurance Company	KY	Yes	No
-	Fortitude National Casualty & Indemnity, Limited	KY	Yes	No
-	Fortress Insurance Company	KY	Yes	No
-	Insula Casualty & Indemnity, Limited	KY	Yes	No
-	Insurance Protection Inc	KY	Yes	No
-	Kingdom Insurance, Inc	KY	Yes	No
-	L & M Insurance Company, Inc	KY	Yes	No
-	Medford Insurance Company, Inc.	KY	Yes	No
-	New Tower Casualty & Indemnity, Limited	KY	Yes	No
-	Pacific Coast Insurance Company, Inc.	KY	Yes	No
-	RichRoga Insurance Company	KY	Yes	No
-	Rising Star Insurance Company, Inc	KY	Yes	No
-	Smokey Mountain Insurance Company, Inc	KY	Yes	No
-	StroHend, Inc.	KY	Yes	No
-	ValuPath Insurance Company, LLC	KY	Yes	No
-	Caliber I Insurance Company, Inc.	KY	Yes	No
-	Caliber II Insurance Company, Inc.	KY	Yes	No
-	Caliber IIII Insurance Company, Inc.	KY	Yes	No
-	Liberonus, Ltd.	KY	Yes	No
-	Star Insurance Company, Inc.	KY	Yes	No
-	Dunes Casualty & Indemnity, Limited	KY	Yes	No
-	Gunning Casualty & Indemnity, Inc	KY	Yes	No
-	Sheakley Insurance Company	KY	Yes	No
-	Stratford Insurance Company	KY	Yes	No
-	AAG Insurance Company, LLC	KY	Yes	No
-	Canton Insurance Company	KY	Yes	No

-	Carthage Insurance Company		KY	Yes	No
-	Eden Rock Insurance Company		KY	Yes	No
-	Ossabaw Insurance, Inc.		KY	Yes	No
-	Tupelo Insurance Company		KY	Yes	No
0	Louisiana Citizens Property Ins Corp		LA	No	No
0	Modern Disciples of Love		LA	No	No
10027	North Amer Fire & Cas Ins Co	574	LA	Yes	No
10050	Progressive Security Ins Co	155	LA	Yes	No
10246	Security Plan Fire Ins Co	612	LA	Yes	No
10248	Safeway Ins Co Of LA	257	LA	Yes	No
10295	USAgencies Cas Ins Co Inc	3596	LA	Yes	No
10671	The Gray Cas & Surety Co	1208	LA	Yes	No
10708	Lemic Ins Co		LA	No	No
10718	Retailers Cas Ins Co		LA	No	No
11042	Stonetrust Commercial Ins Co		LA	No	No
11140	ANPAC LA Ins Co	408	LA	Yes	Yes
11954	Arcadian Hlth Plan of LA Inc	3681	LA	Yes	No
12194	Wellcare of LA Inc	1199	LA	Yes	No
12472	LUBA Cas Ins Co		LA	No	No
12866	T H E Ins Co		LA	Yes	No
12998	Union Natl Fire Ins Co	215	LA	Yes	No
13041	Bankers Specialty Ins Co	689	LA	Yes	No
13207	Lighthouse Prop Ins Corp		LA	Yes	No
13607	Peoples Hlth Inc		LA	Yes	No
14427	Louisiana Farm Bureau Mut Ins Co		LA	No	No
14630	Direct Gen Ins Co of LA	1213	LA	Yes	No
18295	Lafayette Ins Co	248	LA	Yes	Yes
19933	Audubon Ins Co	12	LA	Yes	No
22350	Louisiana Workers Comp Corp		LA	No	No
22900	Louisiana Pest Control Ins Co		LA	Yes	No
26869	Silver Oak Cas Inc	680	LA	Yes	No
27898	Americas Ins Co		LA	Yes	No
31895	American Interstate Ins Co	680	LA	Yes	No
32298	National Union Fire Ins Co Of LA	12	LA	Yes	No
36307	Gray Ins Co	1208	LA	Yes	No
37486	National Automotive Ins		LA	No	No
40681	Firemans Fund Ins Co Of LA	761	LA	Yes	No
40924	Louisiana Farm Bureau Cas Ins Co	483	LA	Yes	Yes
41076	Ocean Marine Ind Ins Co		LA	Yes	No
43621	Great Central Fire Ins Co	1131	LA	Yes	Yes
43656	Louisiana Med Mut Ins Co		LA	No	No
43664	State Natl Fire Ins Co		LA	Yes	Yes
44369	Imperial Fire & Cas Ins Co		LA	Yes	No
50199	First Amer Title Ins Co of LA	70	LA	Yes	No
51527	First Amer Transportation Title Ins	70	LA	Yes	No
51640	State Natl Title Guar Co		LA	Yes	No
56017	Benevolent Knights Of Amer LA Inc		LA	No	No
60009	Southern Natl Life Ins Co Inc	438	LA	Yes	Yes
60076	Security Plan Life Ins Co	612	LA	Yes	No
61298	Bankers Life Of LA	17	LA	Yes	No
64238	Guaranty Income Life Ins Co		LA	Yes	No
66303	Mothe Life Ins Co		LA	No	No
67539	Pan Amer Life Ins Co	525	LA	Yes	Yes
68985	Starmount Life Ins Co		LA	Yes	No
69055	Jeff Davis Mortuary Benefit Assoc		LA	No	No
69060	Guaranty Assur Co	4506	LA	Yes	No
69400	Reliable Serv Ins Co		LA	Yes	Yes
69418	Southern Financial Life Ins Co		LA	No	No
69442	United Burial Ins Co Of Winnsboro		LA	No	No
69779	Union Natl Life Ins Co	215	LA	Yes	No
73733	Dixie Life Ins Co Inc		LA	Yes	Yes
73946	Evangeline Life Ins Co		LA	Yes	Yes
74373	Gertrude Geddes Willis Life Ins Co		LA	Yes	No
74470	Great Central Life Ins Co	1131	LA	Yes	Yes
74918	Kilpatrick Life Ins Co		LA	Yes	No
74942	Lafourche Life Ins Co		LA	Yes	Yes
75094	Life Ins Co Of LA		LA	Yes	No
75159	Majestic Life Ins Co		LA	No	No
75221	Melancon Life Ins Co		LA	No	No
75485	Mulhearn Protective Ins Co		LA	Yes	No
75612	Gulf States Life Ins Co Inc		LA	Yes	No
76244	Security Natl Life Ins Co of LA	454	LA	Yes	No
76317	Pellerin Life Ins Co		LA	No	No
76554	Benevolent Life Ins Co Inc		LA	No	No
76716	Central Amer Life Ins Co		LA	Yes	No

76767	Rabenhorst Life Ins Co		LA	No	No
76805	Reliable Life Ins Co		LA	No	No
76902	Rockett Life Ins Co		LA	No	No
76937	Sabine Life Ins Co		LA	No	No
77879	5 Star Life Ins Co		LA	Yes	No
78085	Rhodes Life Ins Co Of LA Inc		LA	No	No
78336	Wilbert Life Ins Co Plaquemine La		LA	No	No
78344	Williams Progressive Life & Acc I C		LA	No	No
78352	Winnfield Life Ins Co	3436	LA	Yes	No
78484	Zachary Taylor Life Ins Co		LA	Yes	No
81200	Louisiana Hlth Serv & Ind Co	438	LA	Yes	Yes
90239	Pride Of Carroll Life Ins Co		LA	No	No
91499	Memorial Life Ins Co		LA	No	No
91936	North La Industrial Ins Corp Inc		LA	No	No
93459	Pan Amer Assur Co	525	LA	Yes	Yes
94137	Eagle Amer Life Ins Co		LA	Yes	No
94579	First Assur Life Of Amer	905	LA	Yes	No
95009	Health Plus Of LA Inc		LA	Yes	No
95173	Coventry Hlth Care of LA Inc	1137	LA	Yes	No
95584	Vantage Hlth Plan Inc		LA	No	No
95642	Humana Hlth Benefit Plan of LA Inc	119	LA	Yes	No
95643	Hmo LA Inc	438	LA	Yes	Yes
95690	Tenet Choices Inc		LA	Yes	No
95833	United Hlthcare of LA Inc	707	LA	Yes	No
97209	Performance Life Of Amer	905	LA	Yes	No
10017	Arbella Ind Ins Co	586	MA	Yes	Yes
10206	Medical Professional Mut Ins Co	1154	MA	Yes	Yes
10230	Commonwealth Reins Co	586	MA	Yes	Yes
10231	Commonwealth Mut Ins Co	586	MA	Yes	Yes
10394	Bunker Hill Ins Co	415	MA	Yes	No
10638	Proselect Ins Co	1154	MA	Yes	Yes
10664	Endeavour Ins Co	1178	MA	Yes	No
11104	Associated Employers Ins Co	2498	MA	Yes	Yes
11109	Neighborhood Hlth Plan Inc		MA	No	No
11984	Independence Cas Ins Co	1178	MA	Yes	No
12154	Encompass Ins Co of MA	8	MA	Yes	No
12210	Dentegra Ins Co of New England	2479	MA	Yes	No
12219	BCBS of MA HMO Blue Inc	3637	MA	Yes	Yes
12234	Equity Natl Title Ins Co		MA	No	No
12484	Liberty Mut Personal Ins Co	111	MA	Yes	No
12725	New England Mut Ins Co	1275	MA	Yes	Yes
12808	Safety Prop & Cas Ins Co	188	MA	Yes	No
12850	Premier Ins Co Of MA	3548	MA	Yes	No
12886	Massachusetts Employers Ins Co	2498	MA	Yes	Yes
13083	Employers Security Assur Co	2498	MA	Yes	Yes
13163	Hospitality Mut Ins Co		MA	No	No
13203	Boston Medical Center Hlth Plan Inc		MA	No	No
13374	Arrow Mut Liab Ins Co		MA	No	No
13463	Barnstable Cnty Mut Ins Co	919	MA	Yes	Yes
13632	Celticare Hlth Plan of MA Inc	1295	MA	Yes	No
13643	Plymouth Rock Assur Cas Co	415	MA	Yes	No
13706	Dorchester Mut Ins Co	144	MA	Yes	Yes
13943	Fitchburg Mut Ins Co	144	MA	Yes	Yes
14192	Hingham Mut Fire Ins Co	1229	MA	Yes	Yes
14206	Holyoke Mut Ins Co In Salem	50	MA	Yes	No
14435	Lumber Mut Ins Co	946	MA	Yes	No
14737	Plymouth Rock Assur Corp	415	MA	Yes	No
15067	Quincy Mut Fire Ins Co	1275	MA	Yes	Yes
17000	Arbella Mut Ins Co	586	MA	Yes	Yes
18975	HPHC Ins Co Inc	595	MA	Yes	Yes
19763	Bay State Ins Co	22	MA	Yes	Yes
19771	Cambridge Mut Fire Ins Co	22	MA	Yes	Yes
19798	Merrimack Mut Fire Ins Co	22	MA	Yes	Yes
20621	OneBeacon Amer Ins Co	1129	MA	Yes	No
20648	Employers Fire Ins Co	1129	MA	Yes	No
21261	Electric Ins Co		MA	Yes	No
21750	Pilgrim Ins Co	415	MA	Yes	No
23043	Liberty Mut Ins Co	111	MA	Yes	No
23965	Norfolk & Dedham Mut Fire Ins Co	144	MA	Yes	Yes
31887	Coface N Amer Ins Co		MA	Yes	No
33618	Safety Ind Ins Co	188	MA	Yes	No
33758	Associated Industries Of MA Mut Ins	2498	MA	Yes	Yes
34754	Commerce Ins Co	816	MA	Yes	No
35548	American Transportation Ins Co Inc		MA	No	No
36226	United Cas & Surety Ins Co		MA	No	No

37346	Danbury Ins Co	1229	MA	Yes	Yes
38369	Northern Assur Co Of Amer	1129	MA	Yes	No
39454	Safety Ins Co	188	MA	Yes	No
39659	Eastern Cas Ins Co		MA	Yes	No
40274	Citation Ins Co	816	MA	Yes	No
40320	Massachusetts Homeland Ins Co	1129	MA	Yes	No
41360	Arbella Protection Ins Co	586	MA	Yes	Yes
41955	Barnstable Cnty Ins Co	919	MA	Yes	Yes
43702	Tower Natl Ins Co	3703	MA	Yes	No
44326	Atlantic Charter Ins Co	1178	MA	Yes	No
47093	Massachusetts Vision Serv Plan	1189	MA	Yes	No
50989	Massachusetts Title Ins Co	70	MA	Yes	No
52060	Dental Serv of MA Inc	4512	MA	Yes	Yes
53228	BCBS of MA	3637	MA	Yes	Yes
58130	Catholic Assn Of Foresters		MA	N	No
58181	Supreme Council The Royal Arcanum		MA	No	No
60117	Tufts Ins Co Inc		MA	Yes	Yes
61476	Boston Mut Life Ins Co	581	MA	Yes	Yes
65315	Liberty Life Assur Co Of Boston	111	MA	Yes	No
65919	Primerica Life Ins Co	41	MA	Yes	No
65935	Massachusetts Mut Life Ins Co	435	MA	Yes	Yes
66265	Monarch Life Ins Co	440	MA	Yes	Yes
66828	Fallon Hlth & Life Assur Co		MA	Yes	Yes
67598	Paul Revere Life Ins Co	565	MA	Yes	No
67601	Paul Revere Variable Ann Ins Co	565	MA	Yes	No
69140	First Allmerica Fin Life Ins Co	3891	MA	Yes	No
70435	The Savings Bank Life Ins Co Of MA	4553	MA	Yes	Yes
71714	Berkshire Life Ins Co of Amer	429	MA	Yes	Yes
74920	Regal Reins Co	440	MA	Yes	Yes
80896	Centre Life Ins Co	212	MA	Yes	No
84824	Commonwealth Ann & Life Ins Co	3891	MA	Yes	No
91626	New England Life Ins Co	241	MA	Yes	No
93610	John Hancock Life & Hlth Ins Co	904	MA	Yes	No
95299	Connecticare Of MA Inc	1127	MA	Yes	No
95520	CIGNA Hlthcare of MA Inc	901	MA	Yes	No
95541	Fallon Comm Hlth Plan Inc		MA	No	No
95673	Health New England Inc		MA	Yes	No
95688	Tufts Associated Hlth Maintenance Or		MA	No	No
96717	Harvard Pilgrim Health Care New Eng	595	MA	Yes	Yes
96911	Harvard Pilgrim Hlth Care Inc	595	MA	Yes	Yes
3	Peninsula Ind Co	250	MD	Yes	Yes
10095	Bravo Hlth Mid Atlantic Inc	3387	MD	Yes	No
10357	Platinum Underwriters Reins Inc		MD	Yes	No
10367	Avemco Ins Co	984	MD	Yes	No
10656	United States Surety Co	984	MD	Yes	No
11039	Injured Workers Ins Fund		MD	No	No
12260	Campmed Cas & Ind Co Inc MD		MD	Yes	No
12313	Care Improvement Plus of MD Inc	4443	MD	Yes	No
12751	Maryland Care Medicare Inc		MD	No	No
13130	The Dental Network Inc	380	MD	Yes	Yes
13501	Brethren Mut Ins Co		MD	No	No
14141	Harford Mut Ins Co	447	MD	Yes	Yes
14613	Montgomery Mut Ins Co	111	MD	Yes	No
14753	Frederick Mut Ins Co		MD	No	No
14958	Peninsula Ins Co	250	MD	Yes	Yes
16039	Baltimore Equitable Society		MD	No	No
16098	Westminster Amer Ins Co		MD	Yes	No
16128	Paramount Ins Co		MD	Yes	No
19356	Maryland Cas Co	212	MD	Yes	No
20516	Euler Hermes Amer Credit Ind Co	761	MD	Yes	No
22055	Geico Ind Co	31	MD	Yes	No
22063	Government Employees Ins Co	31	MD	Yes	No
22896	Aca Fin Guar Corp		MD	No	No
25422	Atradius Trade Credit Ins Co	181	MD	Yes	No
29017	Professionals Advocate Ins Co	377	MD	Yes	Yes
29955	Legal Mut Liab Ins Society Of MD		MD	No	No
30180	Assured Guar Corp	194	MD	Yes	No
31240	Commonwealth Mut Ins Co of Amer		MD	No	No
31259	Farmers & Mechanics Mut Ins Assn of		MD	No	No
32328	Medical Mut Liab Ins Society of MD	377	MD	Yes	Yes
34347	Colonial Amer Cas & Surety Co	212	MD	Yes	No
34800	Maryland Automobile Ins Fund		MD	No	No
35173	Agency Ins Co Of MD Inc		MD	Yes	No
35882	Geico Gen Ins Co	31	MD	Yes	No
37923	Seaworthy Ins Co	31	MD	Yes	No

37940	Lexington Natl Ins Corp		MD	No	No
39306	Fidelity & Deposit Co Of MD	212	MD	Yes	No
40100	Firstline Natl Ins Co	447	MD	Yes	Yes
40720	Interstate Auto Ins Co Inc		MD	Yes	No
41114	Atlantic Bonding Co		MD	No	No
41491	Geico Cas Co	31	MD	Yes	No
44229	TrustStar Ins Co		MD	Yes	No
47000	Graphic Arts Benefit Corp		MD	Yes	No
47021	Carefirst Inc	380	MD	Yes	Yes
47058	Carefirst of MD Inc	380	MD	Yes	Yes
47074	Denta Chek of MD Inc		MD	Yes	No
48119	Cigna Dental Hlth of MD Inc	901	MD	Yes	No
50784	Security Title Guarantee Corp Baltim		MD	No	No
52040	DentaQuest Mid Atlantic Inc	4512	MD	Yes	Yes
60113	First Care Inc	380	MD	Yes	Yes
60321	Mamsi Life & Hlth Ins Co	707	MD	Yes	No
61212	Baltimore Life Ins Co		MD	Yes	No
63274	OM Fin Life Ins Co	2598	MD	Yes	No
69744	Union Labor Life Ins Co	781	MD	Yes	No
94250	Banner Life Ins Co	872	MD	Yes	No
95025	United Hlthcare Mid Atlantic Inc	707	MD	Yes	No
95253	UNITED CONCORDIA DENTAL PLANS	812	MD	Yes	Yes
95599	Cigna Hlthcare MidAtlantic Inc	901	MD	Yes	No
95639	Kaiser Found Hlth Plan Mid Atlanti	601	MD	Yes	No
95832	AMERIGROUP MD Inc	1156	MD	Yes	No
95846	Group Dental Serv Of MD Inc		MD	Yes	No
96310	MD Individual Practice Assn Inc	707	MD	Yes	No
96940	Optimum Choice Inc	707	MD	Yes	No
-	Maryland Care, Inc		MD	No	No
11149	Maine Employers Mut Ins Co	1332	ME	Yes	Yes
11867	Selective Ins Co of New England	242	ME	Yes	No
12545	Martins Point Generations LLC		ME	Yes	No
13627	SelectCare of ME Inc	953	ME	Yes	No
15997	MMG Ins Co		ME	Yes	No
16020	State Mut Ins Co	45	ME	Yes	Yes
24007	North East Ins Co	3703	ME	Yes	No
25950	Casco Ind Co		ME	Yes	Yes
28290	Patrons Oxford Ins Co	1275	ME	Yes	Yes
31267	York Ins Co of ME	1129	ME	Yes	No
32069	Patriot Ins Co	1309	ME	Yes	Yes
36277	Medical Mut Ins Co Of ME		ME	Yes	Yes
52618	Anthem Hlth Plans of ME Inc	671	ME	Yes	No
60099	Patriot Life Ins Co	1309	ME	Yes	Yes
62235	Unum Life Ins Co Of Amer	565	ME	Yes	No
95447	Cigna Hlthcare of ME Inc	901	ME	Yes	No
95517	Aetna Hlth Inc ME Corp	1	ME	Yes	No
10166	Accident Fund Ins Co of Amer	572	MI	Yes	Yes
10187	Progressive MI Ins Co	155	MI	Yes	No
10190	Southern Owners Ins Co	280	MI	Yes	Yes
10209	Mi Auto Ins Placement Facility		MI	No	No
10229	APSpeciality Ins Corp	966	MI	Yes	No
10499	Chrysler Ins Co		MI	Yes	No
10642	Cherokee Ins Co		MI	No	No
10665	Ameritrust Ins Corp	748	MI	Yes	No
10749	Intrepid Ins Co		MI	Yes	No
10769	Fidelis SecureCare of MI Inc	3744	MI	Yes	No
10787	Great Lakes Cas Ins Co	311	MI	Yes	No
10857	Michigan Ins Co	1243	MI	Yes	Yes
10984	Ansur Amer Ins	1309	MI	Yes	Yes
10985	Fortuity Ins Co	1309	MI	Yes	Yes
10998	Michigan Commercial Ins Mut		MI	No	No
11050	Amerisure Partners Ins Co	124	MI	Yes	No
11081	Pro Care Hlth Plan Inc		MI	No	No
11082	Single Vision Solution Inc		MI	No	No
11107	Midwestern Dental Plans Inc		MI	No	No
11111	UDC of MI Inc	19	MI	Yes	No
11113	Golden Dental Plans Inc		MI	No	No
11185	Foremost Ins Co Grand Rapids MI	212	MI	Yes	No
11204	Heritage Vision Plans Inc		MI	No	No
11511	ASure Worldwide Ins Co	1309	MI	Yes	Yes
11520	Priority Hlth Government Programs	3383	MI	Yes	No
11537	Physicians Hlth Plan Mid MI FamlyCar	3408	MI	Yes	No
11549	Healthplus Partners Inc	3409	MI	Yes	Yes
11557	BlueCaid of MI	572	MI	Yes	Yes
11800	Foremost Prop & Cas Ins Co	212	MI	Yes	No

11924	American Way Cas Co Of MI	673	MI	Yes	Yes
12146	First Commonwealth Ltd Hlth Serv Cor	429	MI	Yes	Yes
12193	OmniCare Hlth Plan Inc	1137	MI	Yes	No
12208	Priority Hlth Ins Co	3383	MI	Yes	No
12304	Accident Fund Gen Ins Co	572	MI	Yes	Yes
12305	Accident Fund Natl Ins Co	572	MI	Yes	Yes
12326	Total Hlth Care USA Inc	1238	MI	Yes	Yes
12471	Retailers Mut Ins Co		MI	No	No
12569	Affirmative Ins Co of MI	3596	MI	Yes	No
12755	Theramatrix Physical Therapy Plan In		MI	No	No
12774	Bristol W Preferred Ins Co	212	MI	Yes	No
12816	PHPMM Ins Co	3408	MI	Yes	No
12824	Manufacturing Technology Mut Ins Co		MI	No	No
12826	Healthplus Ins Co	3409	MI	Yes	Yes
13323	American Fellowship Mut Ins Co		MI	No	No
13554	Squire Reassur Co LLC	918	MI	Yes	No
13721	PrimeOne Ins Co		MI	No	No
13986	Frankenmuth Mut Ins Co	1309	MI	Yes	Yes
13994	Fremont Ins Co		MI	Yes	No
14176	Hastings Mut Ins Co		MI	No	No
14508	Michigan Millers Mut Ins Co		MI	No	No
14516	HARLEYSVILLE LAKE STATES INS CO	253	MI	Yes	Yes
15407	Wolverine Mut Ins Co		MI	No	No
16101	Meemic Ins Co	55	MI	Yes	No
17159	Usf Ins Co	3299	MI	Yes	No
18023	Star Ins Co	748	MI	Yes	No
18180	Founders Ins Co of MI	178	MI	Yes	No
18309	Pioneer State Mut Ins Co		MI	No	No
18694	Great Midwest Ins Co	4669	MI	Yes	No
18988	Auto Owners Ins Co	280	MI	Yes	Yes
19488	Amerisure Ins Co	124	MI	Yes	No
19631	American Road Ins Co	18	MI	Yes	No
21202	Auto Club Ins Assoc	55	MI	Yes	No
21210	Auto Club Grp Ins Co	55	MI	Yes	No
21229	Memberselect Ins Co	55	MI	Yes	No
21547	Farm Bureau Gen Ins Co of MI	67	MI	Yes	No
21555	Farm Bureau Mut Ins Co Of MI	67	MI	Yes	No
22004	CIM Ins Corp	79	MI	Yes	No
22012	Motors Ins Corp	79	MI	Yes	No
23396	Amerisure Mut Ins Co	124	MI	Yes	No
25585	Professionals Direct Ins Co	88	MI	Yes	No
25780	Williamsburg Natl Ins Co	748	MI	Yes	No
26638	Home Owners Ins Co	280	MI	Yes	Yes
27740	North Pointe Ins Co	796	MI	Yes	No
29734	American Equable Inc		MI	Yes	No
30082	CPA Ins Co		MI	No	No
30139	Mlba Mut Ins Co		MI	No	No
30341	Farmers & Merchants Mut Fire Ins Co		MI	No	No
30368	Farmers Mut Ins Co		MI	No	No
30376	Northern Mut Ins Co		MI	No	No
30384	Great Lakes Mut Ins Co		MI	No	No
30430	Sanilac Mut Ins Co		MI	No	No
30457	Southern MI Ins Co	838	MI	Yes	No
31429	Michigan Professional Ins Exch		MI	No	No
31534	Citizens Ins Co Of Amer	88	MI	Yes	No
33006	American Physicians Assur Corp	966	MI	Yes	No
33111	MHA Ins Co	1154	MI	Yes	Yes
33448	Farmers Mut Fire Ins Of Branch Cnty		MI	No	No
33499	Dorinco Reins Co		MI	Yes	No
34029	Michigan Basic Prop Ins Assn		MI	No	No
36269	Titan Ins Co	140	MI	Yes	Yes
36650	Guarantee Co Of N Amer USA		MI	Yes	No
37605	Progressive Marathon Ins Co	155	MI	Yes	No
38601	MIC Prop & Cas Ins Corp	79	MI	Yes	No
38660	MIC Gen Ins Corp	79	MI	Yes	No
38954	ProAssurance Cas Co	2698	MI	Yes	No
41513	Foremost Signature Ins Co	212	MI	Yes	No
41840	Allmerica Fin Benefit Ins Co	88	MI	Yes	No
47775	Michigan Dental Plan Inc		MI	No	No
52006	Michigan Eyecare Assoc Inc		MI	No	No
52025	DENCAP DENTAL PLANS INC		MI	No	No
52030	Cooperative Optical Serv Inc		MI	No	No
52037	Blue Care Of MI Inc	572	MI	Yes	Yes
52563	Health Plan of MI Inc	4640	MI	Yes	No
52615	Upper Peninsula Hlth Plan		MI	Yes	No

52620	Behavioral Hlthcare Mgmt Inc		MI	Yes	No
52630	Molina Hlthcare of MI	1531	MI	Yes	No
54291	BCBS of MI	572	MI	Yes	Yes
54305	Delta Dental Plan of MI Inc	477	MI	Yes	No
56154	Gleaner Life Ins Society		MI	No	No
56170	Womans Life Ins Society		MI	No	No
60134	Alliance Hlth & Life Ins Co	1311	MI	Yes	No
60305	American Comm Mut Ins Co		MI	No	No
61190	Auto Owners Life Ins Co	280	MI	Yes	Yes
63096	Farm Bureau Life Ins Co Of MI	67	MI	Yes	No
65056	Jackson Natl Life Ins Co	918	MI	Yes	No
65838	John Hancock Life Ins Co (USA)	904	MI	Yes	No
66753	Liberty Union Life Assur Co		MI	No	No
71854	AAA Life Ins Co		MI	Yes	No
77720	LifeSecure Ins Co	572	MI	Yes	Yes
78620	Brooke Life Ins Co	918	MI	Yes	No
80659	US Business of Canada Life Assur Co	769	MI	Yes	No
80675	US Business of Crown Life Ins Co	769	MI	Yes	No
80705	US Br Great West Life Assur Co	769	MI	Yes	No
80802	US Br SunLife Assur Co Of Canada	549	MI	Yes	No
83550	US Business of London Life Ins Co	769	MI	Yes	No
84522	Auto Club Life Ins Co	55	MI	Yes	No
84549	Vista Life Ins Co	18	MI	Yes	No
87882	Associated Mut Hospital Serv of MI		MI	Yes	No
87920	Locomotive Engineers & Conductors Mu		MI	No	No
93777	Household Life Ins Co	352	MI	Yes	No
95453	Grand Valley Hlth Plan Inc		MI	No	No
95467	Great Lakes Hlth Plan	707	MI	Yes	No
95471	The Wellness Plan	1150	MI	Yes	Yes
95561	Priority Hlth	3383	MI	Yes	No
95562	CareSource MI		MI	Yes	No
95566	Paramount Care Of MI Inc	1212	MI	Yes	No
95580	Healthplus Of MI Inc	3409	MI	Yes	Yes
95582	Michigan HMO Plans Inc		MI	Yes	Yes
95610	Blue Care Network Of MI	572	MI	Yes	Yes
95644	Total Hlth Care Inc	1238	MI	Yes	Yes
95751	Ultimed HMO of MI		MI	Yes	No
95756	Aetna Hlth Inc MI Corp	1	MI	Yes	No
95814	Midwest Hlth Plan Inc		MI	No	No
95844	Health Alliance Plan Of MI	1311	MI	Yes	No
95848	McLaren Hlth Plan		MI	Yes	No
95849	Physicians Hlth Plan of Mid-MI	3408	MI	Yes	No
96150	UNITED CONCORDIA DENTAL PLNS OF MW	812	MI	Yes	Yes
97772	US Hlth & Life Ins Co Inc		MI	No	No
10011	Mada Ins Exch		MN	No	No
10012	Norweigian Mut Fire Ins Co		MN	No	No
10049	First Mercury Cas Co	3617	MN	Yes	No
10054	Securian Cas Co	869	MN	Yes	No
10293	Integra Ins Inc		MN	Yes	No
10653	Mound Prairie Mut Ins Co		MN	No	No
10913	Hay Creek Mut Ins Co		MN	No	No
10949	Bloomfield Mut Ins Co		MN	No	No
11028	Spring Valley Mut Ins Co		MN	No	No
11038	Vasa Spring Garden Mut Ins Co		MN	No	No
11043	Health Care Ins Recip		MN	No	No
11186	Fairmont Farmers Mut Ins Co		MN	No	No
11347	SFM Mut Ins Co	4279	MN	Yes	Yes
11678	Primewest Hlth		MN	No	No
11817	PreferredOne Ins Co	3492	MN	Yes	No
12296	Whitecap Surety Co		MN	No	No
12311	Bloomington Compensation Ins Co	175	MN	Yes	Yes
12362	Western Mut Fire Ins CO		MN	No	No
12364	West Central Mut Ins Co		MN	No	No
12365	Agassiz Odessa Mut Fire		MN	No	No
12366	Albany Mut Ins Co		MN	No	No
12367	Arctander Lake Andrew Mut		MN	No	No
12368	Beaver Creek Mut Ins Co		MN	No	No
12369	Bird Island Hawk Creek Mut Ins Co		MN	No	No
12370	Claremont Farmers Mut Fire		MN	No	No
12371	Chisago Lakes Mut Ins Co		MN	No	No
12374	Cokato Mut Fire Ins Co		MN	No	No
12375	Comstock Farmers Mut Fire		MN	No	No
12376	Corn Belt Mut Ins Co		MN	No	No
12377	Crate Farmers Mut Ins Co		MN	No	No
12379	Dakota Stanton Mut Ins Co		MN	No	No

12380	De Mut Ins Co		MN	No	No
12381	Elmdale Farmers Mut Ins		MN	No	No
12382	Farmers Mut Fire Ins Co		MN	No	No
12383	Farmers Mut Ins Co		MN	No	No
12384	Flom Region Mut Ins Co		MN	No	No
12385	Flora Mut Ins Co		MN	No	No
12387	So Central Mut Ins Co		MN	No	No
12388	Garfield Farmers Mut Fire		MN	No	No
12389	Bray Gentilly Mut Ins Co		MN	No	No
12390	German Farmers Mut Fire Ins		MN	No	No
12391	Gillford Mut Fire Ins Co		MN	No	No
12392	Mid MN Mut Ins Co		MN	No	No
12393	Grove Mut Fire Ins Co		MN	No	No
12395	Hallock Farmers Mut Fire		MN	No	No
12396	Halstad Mut Fire Ins Co		MN	No	No
12397	Holmes City Farmers Mut Ins		MN	No	No
12398	Hope Mut Ins Co		MN	No	No
12399	Itasca Mut Ins Co		MN	No	No
12400	Kelso & Shelby Farmers Mut Fire Ins		MN	No	No
12401	Kenyon Holden Warsaw Mut		MN	No	No
12402	Kerkhoven Hayes Mut Ins Co		MN	No	No
12403	King Town Farmers Mut Ins Co		MN	No	No
12404	Lac Qui Parle Mut Ins Co		MN	No	No
12405	Lake Park Cuba Ins Co		MN	No	No
12406	Leenthrop Farmers Mut Ins		MN	No	No
12407	Leon Mut Fire Ins Co		MN	No	No
12409	SW Mut Ins Co		MN	No	No
12410	Madelia Lake Crystal Mut		MN	No	No
12411	Marshall Co Mut Ins Co		MN	No	No
12412	McPherson Minn Lake Mut Ins Co		MN	No	No
12413	Melrose Mut Ins Co		MN	No	No
12414	Mid State Mut Ins Co		MN	No	No
12417	Moe Urness Lund Mut Ins Co		MN	No	No
12418	Mower Cnty Farmers Mut Ins Co		MN	No	No
12419	Buffalo Lake New Aurum Mut Ins		MN	No	No
12420	New Munich Farmers Mut Fire		MN	No	No
12421	New Prague Ceska Louisville Mut		MN	No	No
12422	New Sweden Mut Ins Co		MN	No	No
12423	No Br Mut Ins Co		MN	No	No
12425	No Fork Mut Fire Ins Co		MN	No	No
12427	Owatonna Mut Fire Ins Co		MN	No	No
12428	Palmyra Farmers Mut Ins Assn		MN	No	No
12429	Palo Mut Fire Ins Assn		MN	No	No
12430	Oscar Parke Mut Ins Co		MN	No	No
12431	Prairie Pine Mut Ins Co		MN	No	No
12433	Paynesville Mut Ins Co		MN	No	No
12434	Pioneer Lake Mut Ins Co		MN	No	No
12435	Plainview Mut Ins Co		MN	No	No
12437	Preble Farmers Mut Fire Ins Co		MN	No	No
12442	Redwood Cnty Farmers Mut		MN	No	No
12443	Rice Cnty Mut Ins Co		MN	No	No
12444	SE Mut Ins Co		MN	No	No
12445	Roseau City Mut Ins Co		MN	No	No
12446	St Joseph Mut Ins Co		MN	No	No
12447	Han San Lake Mut Ins Co		MN	No	No
12449	Shible Mut Fire Ins Co		MN	No	No
12450	Spring Vale Mut Ins Co		MN	No	No
12451	Stark Farmers Mut Fire Ins		MN	No	No
12452	Sumter Mut Ins Co		MN	No	No
12453	Sverdrup Mut Ins Co		MN	No	No
12454	Lakeland Farmers Ins Co		MN	No	No
12455	Sweet Township Mut Fire Ins		MN	No	No
12456	Tara Mut Fire Ins Co		MN	No	No
12457	Unity Mut Ins Co		MN	No	No
12458	Vernon Edda Mut Fire Ins Co		MN	No	No
12459	Medica Ins Co	1552	MN	Yes	No
12460	Vineland Huntsville Mut Ins		MN	No	No
12461	Wanamingo Mut Ins Co		MN	No	No
12462	Westbrook Mut Ins Co		MN	No	No
12463	White Bear Lake Ins Co		MN	No	No
12464	Wilmington Mut Ins Co		MN	No	No
12465	Woodland Mut Ins Co		MN	No	No
12466	Young Amer Mut Ins Co		MN	No	No
12468	Heartland Mut Ins Co		MN	No	No
12585	Volunteer Firefighters Benefit Assn		MN	No	No

13412	Austin Mut Ins Co		MN	No	No
13935	Federated Mut Ins Co	7	MN	Yes	Yes
14850	North Star Mut Ins Co	698	MN	Yes	Yes
15377	Western Natl Mut Ins Co	309	MN	Yes	Yes
15695	Forest Products Ins Exch	946	MN	Yes	Yes
16292	Land Of Lakes Mut Ins Co		MN	Yes	Yes
16330	Ram Mut Ins Co		MN	No	No
16942	MMI Insurance, Inc.		MN	Yes	No
22454	Mendakota Ins Co	1326	MN	Yes	No
23574	Midwest Family Mut Ins Co		MN	No	No
23647	Ironshore Ind Inc	4509	MN	Yes	No
24015	Northland Ins Co	3548	MN	Yes	No
24031	Northland Cas Co	3548	MN	Yes	No
24465	Western Natl Assur Co	309	MN	Yes	Yes
24767	St Paul Fire & Marine Ins Co	3548	MN	Yes	No
24775	St Paul Guardian Ins Co	3548	MN	Yes	No
24791	St Paul Mercury Ins Co	3548	MN	Yes	No
25232	AIG Advantage Ins Co	212	MN	Yes	No
25240	NAU Country Ins Co		MN	Yes	No
26395	Western Home Ins Co	309	MN	Yes	Yes
27049	SFM Select Ins Co	4279	MN	Yes	Yes
28304	Federated Serv Ins Co	7	MN	Yes	Yes
29645	Park Glen Natl Ins Co		MN	No	No
30996	Minnesota Surety And Trust Co		MN	Yes	No
31003	Tri State Ins Co Of MN	98	MN	Yes	No
33650	Mendota Ins Co	1326	MN	Yes	No
36684	Riverport Ins Co	98	MN	Yes	No
39039	Rural Comm Ins Co	471	MN	Yes	No
40312	Pioneer Specialty Ins Co	309	MN	Yes	Yes
41750	St Paul Medical Liab Ins Co	3548	MN	Yes	No
41769	Athena Assur Co	3548	MN	Yes	No
42234	Minnesota Lawyers Mut Ins Co		MN	No	No
42293	North Star Gen Ins Co	698	MN	Yes	Yes
44547	Healthpartners Ins Co		MN	No	No
45934	American Compensation Ins Co	175	MN	Yes	Yes
48011	Health Ventures Ntwrk Inc		MN	Yes	No
50520	Old Republic Natl Title Ins Co	150	MN	Yes	No
52625	First Plan of MN	461	MN	Yes	No
52626	Medica Hlth Plans	1552	MN	Yes	No
52627	Metropolitan Hlth Plan		MN	No	No
52628	Group Hlth Plan Inc	1258	MN	Yes	No
52629	UCare MN	4380	MN	Yes	Yes
55026	BCBSM Inc	461	MN	Yes	No
55034	Delta Dental of MN		MN	Yes	No
56200	American Fraternal Union		MN	No	No
57053	Catholic Aid Assn		MN	No	No
57088	Degree Of Honor Protective Assn		MN	No	No
57142	Sons Of Norway		MN	No	No
61522	MH Life Inc	461	MN	Yes	No
63258	Federated Life Ins Co	7	MN	Yes	Yes
65005	RiverSource Life Ins Co	4	MN	Yes	No
66133	Wilton Reassur Co	4213	MN	Yes	No
66168	Minnesota Life Ins Co	869	MN	Yes	No
67105	Reliastar Life Ins Co	229	MN	Yes	No
68721	Security Life Ins Co Of Amer	492	MN	Yes	No
69604	Allianz Life & Ann Co	761	MN	Yes	No
90611	Allianz Life Ins Co Of N Amer	761	MN	Yes	No
93742	Securian Life Ins Co	869	MN	Yes	No
95649	HMO dba Blue Plus	461	MN	Yes	No
95724	PreferredOne Comm Hlth Plan	3492	MN	Yes	No
95725	Sanford Hlth Plan of MN	1246	MN	Yes	No
95766	Healthpartners Inc	1258	MN	Yes	No
97721	Thrivent Life Insurance Company	2938	MN	Yes	Yes
10037	Interlex Ins Co	1272	MO	Yes	No
10191	MO Employers Mut Ins Co		MO	Yes	Yes
10686	Medical Liab Alliance	861	MO	Yes	Yes
10753	Blue Advantage Plus of KC Inc	537	MO	Yes	Yes
10783	Cornerstone Natl Ins Co		MO	Yes	No
10966	Bar Plan Surety & Fidelity Co	1228	MO	Yes	Yes
11044	GMAC Ins Co Online Inc	79	MO	Yes	No
11054	Maiden Reins Co	4684	MO	Yes	No
11150	Arch Ins Co	1279	MO	Yes	No
11160	Cigna Dental Hlth of MO Inc	901	MO	Yes	No
11255	Caterpillar Ins Co	3569	MO	Yes	No
11529	Mercy Hlth Plans	3386	MO	Yes	No

11582	Missouri Professionals Mut		MO	No	No
11699	Essence Hlthcare Inc	4597	MO	Yes	No
11704	Physicians Professional Ind Assn		MO	No	No
11964	Missouri Doctors Mut Ins Co		MO	No	No
11997	Caterpillar Life Ins Co	3569	MO	Yes	No
12278	Essex Benefits Ins Co Inc	3680	MO	Yes	No
12345	Farm Bureau New Horizons Ins Co of M	514	MO	Yes	No
12361	Galen Ins Co		MO	Yes	No
12522	Agents Natl Title Ins Co		MO	Yes	No
12913	Missouri Care Inc	1	MO	Yes	No
13073	Keystone Mut Ins Co		MO	No	No
13194	Physicians Ins Mut		MO	No	No
15105	Safety Natl Cas Corp	74	MO	Yes	No
15512	Automobile Club Interins Exch	1318	MO	Yes	Yes
15679	National Fire & Ind Exch		MO	No	No
15725	Cameron Mut Ins Co	532	MO	Yes	Yes
16551	Savers Prop & Cas Ins Co	748	MO	Yes	No
21172	Vanliner Ins Co		MO	Yes	No
21849	American Automobile Ins Co	761	MO	Yes	No
23108	Lumbermens Underwriting Alliance		MO	No	No
23361	Shelter Gen Ins Co	123	MO	Yes	Yes
23388	Shelter Mut Ins Co	123	MO	Yes	Yes
23728	National Gen Ins Co	79	MO	Yes	No
26557	Shelter Reins Co	123	MO	Yes	Yes
26859	Farm Bureau Town & Country Ins Co of	514	MO	Yes	No
27235	Auto Club Family Ins Co	1318	MO	Yes	Yes
27642	Missouri Hospital Plan	861	MO	Yes	Yes
28339	Gateway Ins Co		MO	Yes	No
28401	American Natl Prop & Cas Co	408	MO	Yes	Yes
29513	The Bar Plan Mut Ins Co	1228	MO	Yes	Yes
30597	Farmers Mut Ins Co Of Dade Cty		MO	No	No
30945	Plaza Ins Co	175	MO	Yes	Yes
32026	Farmers Mut Ins Co Of Pettis Cty		MO	No	No
32140	MO Housing Authorities P&C Ins Inc		MO	No	No
32395	Vision Serv Plan Ins Co	1189	MO	Yes	No
32654	Missouri Physicians Assoc		MO	Yes	No
33367	Intermed Ins Co	1272	MO	Yes	No
34916	First Specialty Ins Corp	181	MO	Yes	No
35769	Lyndon Prop Ins Co	458	MO	Yes	No
36625	Old Reliable Cas Co	215	MO	Yes	No
37915	Essentia Ins Co	1129	MO	Yes	No
39845	Westport Ins Corp	181	MO	Yes	No
39942	American Natl Gen Ins Co	408	MO	Yes	Yes
40371	Columbia Mut Ins Co	807	MO	Yes	Yes
42447	National Gen Assur Co	79	MO	Yes	No
42498	Cameron Natl Ins Co	532	MO	Yes	Yes
42722	First Marine Ins Co	361	MO	Yes	No
42749	Traders Ins Co		MO	No	No
44083	Preferred Physicians Medical RRG		MO	Yes	No
47035	Essex Dental Benefits Inc	3680	MO	Yes	No
47044	UNITED DENTAL CARE OF MO INC	19	MO	Yes	No
47171	BCBS of KC	537	MO	Yes	Yes
47716	First Commonwealth of MO Inc	429	MO	Yes	Yes
48160	Dental Source of MO & KS Inc	4506	MO	Yes	No
55697	Delta Dental of MO	3680	MO	Yes	No
56006	Travelers Protective Assn Of Amer		MO	No	No
60040	Cox Hlth Systems Ins Co	1203	MO	Yes	No
60048	Preservation Life Ins Co		MO	Yes	No
60593	National States Ins Co		MO	Yes	No
61573	Capital Reserve Life Ins Co	454	MO	Yes	No
63118	Farm Bureau Life Ins Co Of MO	514	MO	Yes	No
63665	General Amer Life Ins Co	241	MO	Yes	No
65129	Kansas City Life Ins Co	588	MO	Yes	Yes
65757	Shelter Life Ins Co	123	MO	Yes	Yes
67199	Old Amer Ins Co	588	MO	Yes	Yes
67393	Ozark Natl Life Ins Co		MO	Yes	No
68357	Reliable Life Ins Co	215	MO	Yes	No
69272	Sunset Life Ins Co Of Amer	588	MO	Yes	Yes
69337	American Fin Security Life		MO	Yes	No
70742	Family Benefit Life Ins Co		MO	No	No
71595	Lewer Life Ins Co		MO	No	No
71870	Fidelity Security Life Ins Co	451	MO	Yes	Yes
76040	Missouri Valley Life & Hlth Ins Co	537	MO	Yes	Yes
78972	Healthy Alliance Life Ins Co	671	MO	Yes	No
81000	Cambridge Life Ins Co	1137	MO	Yes	No

81779	Individual Assur Co Life Hlth & Acc	312	MO	Yes	No
89004	Reinsurance Co Of MO Inc	4639	MO	Yes	No
92681	Community Hlth Plan Ins Co	3486	MO	Yes	No
93513	MetLife Investors Ins Co	241	MO	Yes	No
93572	RGA Reins Co	4639	MO	Yes	No
95145	Community Hlth Plan	3486	MO	Yes	No
95309	Mercy Hlth Plans of MO Inc	3386	MO	Yes	No
95315	Good Hlth Hmo Inc	537	MO	Yes	Yes
95318	Healthcare USA Of MO LLC	1137	MO	Yes	No
95358	Hmo MO Inc	671	MO	Yes	No
95530	Cox Hlth System HMO Inc	1203	MO	Yes	No
95609	Alliance For Comm Hlth LLC	1531	MO	Yes	No
95635	Cigna Hlthcare of St Louis Inc	901	MO	Yes	No
95636	Childrens Mercys Family Hlth Partner		MO	Yes	No
96377	Group Hlth Plan Inc	1137	MO	Yes	No
96385	United Hlthcare of Midwest Inc	707	MO	Yes	No
96475	Healthlink Hmo Inc	671	MO	Yes	No
97071	Generali USA Life Reassur Co	1169	MO	Yes	No
97780	AGC Life Ins Co	12	MO	Yes	No
-	ANDREW COUNTY MUTUAL INSURANCE COMPANY		MO	No	No
-	ARNSBERG FARMERS MUTUAL INSURANCE COMPANY		MO	No	No
-	BARTON MUTUAL INSURANCE COMPANY		MO	No	No
-	BILLINGS MUTUAL INSURANCE COMPANY INC		MO	No	No
-	BOEUF & BERGER MUTUAL INSURANCE COMPANY INC		MO	No	No
-	BRINKTOWN FARMERS MUTUAL INSURANCE COMPANY		MO	No	No
-	BUCHANAN COUNTY MUTUAL INSURANCE COMPANY		MO	No	No
-	BUNCETON MUTUAL INSURANCE COMPANY		MO	No	No
-	CALDWELL COUNTY MUTUAL INSURANCE COMPANY		MO	No	No
-	CAPE MUTUAL INSURANCE COMPANY		MO	No	No
-	CEDAR COUNTY FARMERS MUTUAL INSURANCE COMPANY		MO	No	No
-	CENTRAL FARMERS MUTUAL FIRE INSURANCE COMPANY I		MO	No	No
-	CENTRAL MUTUAL INSURANCE COMPANY		MO	No	No
-	CENTURY MUTUAL INSURANCE		MO	No	No
-	CHARITON COUNTY MUTUAL INSURANCE COMPANY		MO	No	No
-	CITIZENS MUTUAL INSURANCE COMPANY		MO	No	No
-	CLARK MUTUAL INSURANCE COMPANY		MO	No	No
-	CLARKS FORK MUTUAL INSURANCE COMPANY		MO	No	No
-	COLFAX FARMERS MUTUAL INSURANCE COMPANY		MO	No	No
-	CONCORDIA FARMERS MUTUAL INSURANCE COMPANY		MO	No	No
-	DRAKE-BEEMONT MUTUAL INSURANCE COMPANY		MO	No	No
-	FARM MUTUAL INSURANCE OF ST FRANCOIS COUNTY		MO	No	No
-	FARMERS & LABORERS COOP INS ASSN AUDRAI		MO	No	No
-	FARMERS AND LABORERS MUTUAL INSURANCE COMPANY		MO	No	No
-	FARMERS HOME INSURANCE CO RAY COUNTY		MO	No	No
-	FARMERS MUTUAL FIRE AND LIGHTNING INSURANCE COM		MO	No	No
-	FARMERS MUTUAL FIRE INS OF GENTRY CO		MO	No	No
-	FARMERS MUTUAL FIRE INSURANCE CO OF RANDOLPH CO		MO	No	No
-	FARMERS MUTUAL FIRE INSURANCE CO SHELBY COUNTY		MO	No	No
-	FARMERS MUTUAL FIRE INSURANCE COMPANY OF PLATTE		MO	No	No
-	FARMERS MUTUAL INS CO CALLAWAY CO		MO	No	No
-	FARMERS MUTUAL INS CO CLAY CO		MO	No	No
-	FARMERS MUTUAL INS CO OF CLINTON COUNTY		MO	No	No
-	FARMERS MUTUAL INSURANCE CO MACON MISSOURI		MO	No	No
-	FARMERS MUTUAL INSURANCE CO NEWTON COUNTY		MO	No	No
-	FARMERS MUTUAL INSURANCE CO WARREN COUNTY		MO	No	No
-	FARMERS MUTUAL INSURANCE COMPANY ADAIR COUNTY		MO	No	No
-	FARMERS MUTUAL INSURANCE COMPANY GRUNDY COUN		MO	No	No
-	FARMERS MUTUAL INSURANCE COMPANY LINN COUNTY		MO	No	No
-	FARMERS MUTUAL INSURANCE COMPANY LIVINGSTON CO		MO	No	No
-	FARMERS MUTUAL INSURANCE COMPANY OF BENTON COI		MO	No	No
-	FARMERS MUTUAL INSURANCE COMPANY OF COLE CAMP		MO	No	No
-	FARMERS MUTUAL INSURANCE COMPANY OF DAVIESS CO		MO	No	No
-	FARMERS MUTUAL INSURANCE COMPANY OF MARION COI		MO	No	No
-	FARMERS MUTUAL INSURANCE COMPANY OF NODAWAY C		MO	No	No
-	FARMERS MUTUAL INSURANCE COMPANY OF STE GENEVII		MO	No	No
-	FARMERS MUTUAL INSURANCE COMPANY OF SULLIVAN A		MO	No	No
-	FARMERS MUTUAL PROTECTIVE ASSOCIATION OF BENTON		MO	No	No
-	FARMERS MUTUAL REINSURANCE COMPANY OF MISSOURI		MO	No	No
-	FOREST GREEN FARMERS MUTUAL INSURANCE COMPANY		MO	No	No
-	FREEDOM MUTUAL INSURANCE COMPANY		MO	No	No
-	FREISTATT MUTUAL INSURANCE COMPANY		MO	No	No
-	GASCONADE FARMERS MUTUAL FIRE INSURANCE COMPAI		MO	No	No
-	GATEWAY MUTUAL INSURANCE COMPANY		MO	No	No
-	GERMAN MUTUAL INSURANCE COMPANY		MO	No	No
-	HENRY COUNTY MUTUAL INSURANCE COMPANY		MO	No	No

-	HICKORY COUNTY FARMERS MUTUAL INSURANCE COMPA		MO	No	No
-	HIGHLAND MUTUAL INSURANCE COMPANY		MO	No	No
-	JASPER COUNTY MUTUAL INSURANCE COMPANY		MO	No	No
-	KNOX COUNTY MUTUAL INSURANCE COMPANY		MO	No	No
-	LACLEDE MUTUAL INSURANCE		MO	No	No
-	LEWIS COUNTY MUTUAL INSURANCE COMPANY		MO	No	No
-	LIBERTY FIRE BENEVOLENT SOCIETY		MO	No	No
-	LINCOLN COUNTY FARMERS MUTUAL INSURANCE		MO	No	No
-	LUTHERAN FIRE AND LIGHTNING INSURANCE COMPANY O		MO	No	No
-	MAMIC MUTUAL INSURANCE COMPANY		MO	No	No
-	MARTINSBURG MUTUAL INSURANCE COMPANY		MO	No	No
-	MERAMEC VALLEY MUTUAL INSURANCE COMPANY		MO	No	No
-	MIDWEST PREFERRED MUTUAL INSURANCE COMPANY		MO	No	No
-	MISSOURI HERITAGE MUTUAL INSURANCE COMPANY		MO	No	No
-	MISSOURI STATE MUTUAL INSURANCE COMPANY INC		MO	No	No
-	MONROE COUNTY FARMERS MUTUAL INSURANCE COMPA		MO	No	No
-	MUTUAL INSURANCE COMPANY THE		MO	No	No
-	NORTH MISSOURI MUTUAL INSURANCE COMPANY THE		MO	No	No
-	OLD MISSOURI MUTUAL INSURANCE COMPANY		MO	No	No
-	OSAGE COUNTY FARMERS MUTUAL AID ASSOCIATION		MO	No	No
-	PATRONS AND FARMERS MUTUAL OF MISSOURI		MO	No	No
-	PERRY COUNTY MUTUAL INSURANCE COMPANY		MO	No	No
-	PIKE COUNTY MUTUAL INSURANCE COMPANY		MO	No	No
-	POLK COUNTY MUTUAL INSURANCE COMPANY		MO	No	No
-	PREFERRED STANDARD MUTUAL INSURANCE COMPANY		MO	No	No
-	RALLS COUNTY MUTUAL INSURANCE COMPANY		MO	No	No
-	SCHUYLER COUNTY MUTUAL INSURANCE COMPANY		MO	No	No
-	SCOTT COUNTY FARMERS MUTUAL INSURANCE COMPANY		MO	No	No
-	SOUTHEAST MISSOURI MUTUAL FIRE INSURANCE COMPAN		MO	No	No
-	ST ELIZABETH MUTUAL INSURANCE COMPANY		MO	No	No
-	ST THOMAS BABBTOWN MUTUAL INSURANCE COMPANY		MO	No	No
-	TEXAS COUNTY MUTUAL INSURANCE COMPANY		MO	No	No
-	UNITED MUTUAL INSURANCE COMPANY		MO	No	No
-	GREATER MISSOURI EDUCATIONAL TRUST		MO	No	No
-	MIDWEST PUBLIC RISK OF MISSOURI		MO	No	No
-	MISSOURI DENTAL TRUST		MO	No	No
-	MISSOURI EDUCATORS UNIFIED HEALTH PLAN INC		MO	No	No
-	MISSOURI INTERGOVERNMENTAL RISK MANAGEMENT AS		MO	No	No
-	MISSOURI PUBLIC ENTITY RISK MGMT FUND		MO	No	No
-	MISSOURI UNITED SCHOOL INSURANCE COUNCIL		MO	No	No
-	ST LOUIS AREA INSURANCE TRUST		MO	No	No
-	Watkins Life & Benefit Association		MO	No	No
-	3 Other Missouri Captive Insurers		MO	Yes	No
-	3 Missouri Captive Insurers		MO	Yes	No
10058	Southern Farm Bureau Prop	483	MS	Yes	Yes
10170	American Federated Ins Co	641	MS	Yes	No
10313	The USA Ins Co		MS	Yes	No
10339	Medical Assur Co Of MS		MS	No	No
10889	Direct Gen Ins Co of MS	1213	MS	Yes	No
10993	Brierfield Ins Co	474	MS	Yes	No
11124	Versant Cas Ins Co	905	MS	Yes	No
11208	AmFed Natl Ins Co	661	MS	Yes	Yes
11963	AmFed Cas Ins Co	661	MS	Yes	Yes
13158	Pine Belt Life Ins Co		MS	Yes	No
13741	Coastal American Ins Co	4689	MS	Yes	Yes
14605	Mississippi Farm Bureau Mut Ins Co		MS	No	No
18325	Southern Farm Bureau Cas Ins Co	483	MS	Yes	Yes
18468	Indemnity Natl Ins Co		MS	Yes	No
19925	Audubon Ind Co	12	MS	Yes	No
27669	Mississippi Farm Bureau Cas Ins Co	483	MS	Yes	Yes
36765	Gulf Guar Ins Co	948	MS	Yes	Yes
50030	Mississippi Guar Title Ins Co		MS	No	No
51004	Mississippi Valley Title Ins Co	150	MS	Yes	No
60111	BCBS Of MS Mut Ins Co	1126	MS	Yes	Yes
60209	Allied Funeral Assoc Ins Co		MS	Yes	No
61018	Magna Ins Co		MS	Yes	No
63117	First M&F Ins Co		MS	Yes	No
68535	Bluebonnet Life Ins Co	1126	MS	Yes	Yes
68896	Southern Farm Bureau Life Ins Co	893	MS	Yes	No
75208	Magnolia Guaranty Life Ins Co		MS	No	No
75337	Family Security Life Ins Co Inc		MS	No	No
75531	Southern Security Life Ins Co Inc	454	MS	Yes	No
75620	Unity Life Ins Co Inc		MS	No	No
75647	Peoples Assured Family Life Ins Co		MS	Yes	No
77976	Gulf Guar Life Ins Co	948	MS	Yes	Yes

83666	USA Ins Co		MS	Yes	No
89141	Mississippi Amer Life Ins Co		MS	No	No
90867	Century Credit Life Ins Co		MS	Yes	No
93650	Versant Life Ins Co	905	MS	Yes	No
94617	Southern Capital Life Ins Co	893	MS	Yes	No
95289	Hmo Of MS Inc	1126	MS	Yes	Yes
95686	PhysiciansPlus Baptist & St Dominic		MS	Yes	No
95716	United Hlth Care of MS Inc	707	MS	Yes	No
98736	American Federated Life Ins Co	641	MS	Yes	No
11534	American T & T Ins Co RRG		MT	No	No
11585	Mountain States Hlthcare Recip RRG		MT	No	No
11696	Guardian RRG Inc		MT	Yes	No
12175	Systems Protection Assur Inc		MT	Yes	No
12293	National Contractors Ins Co Inc RRG		MT	No	No
12355	MD RRG Inc		MT	No	No
12497	Preferred Contractors Ins Co RRG LLC		MT	No	No
12631	American Builders Ins Co RRG Inc		MT	Yes	No
12814	Allegiance Life & Hlth Ins Co Inc	901	MT	Yes	No
12845	Obstetricians & Gynecologists RRG of		MT	No	No
12900	Victory Ins Co Inc		MT	No	No
12922	US Fidelis Ins Co RRG Inc		MT	Yes	No
13046	Physicians RRG LLC		MT	No	No
13067	Professionals RRG Inc		MT	Yes	No
13647	Presidio Reins Corp		MT	Yes	No
13665	Kootenai Reins Corp		MT	Yes	No
13720	CrossFit RRG Inc		MT	No	No
24470	Valor Ins Co Inc	930	MT	Yes	No
28436	Farmers Union Mut Ins Co		MT	No	No
32450	Attorneys Liab Protection Soc RRG		MT	Yes	No
50555	First MT Title Ins Co		MT	Yes	No
53686	BCBS of MT	1118	MT	Yes	Yes
73806	Big Sky Life Inc		MT	No	No
92428	Great Western Life Ins Co	1280	MT	Yes	No
95829	New W Hlth Serv		MT	No	No
-	Arlington Grandview Insurance Company, Inc.		MT	No	No
-	Big Sky Insurance Company, Ltd.		MT	No	No
-	Glacier Indemnity, Inc.		MT	No	No
-	Granite Mountain Insurance Company		MT	No	No
-	MHA Workers Compensation Reciprocal		MT	No	No
-	Montana Health Network Liability & Casualty Exch.		MT	No	No
-	Montana Healthcare Indemnity LLC		MT	No	No
-	Northern Rockies Insurance Company LLC		MT	No	No
-	Big Sky Farm Mutual Insurance Company		MT	No	No
-	Bitterroot Farm Mutual Insurance, Inc.		MT	No	No
-	Cascade Farmers Mutual Insurance Company		MT	No	No
-	Farmers Mutual Fire Insurance Company		MT	No	No
-	Farmers' Mutual Insurance Company of Montana		MT	No	No
-	Fergus Farm Mutual		MT	No	No
-	Flathead Farmers Mutual Insurance Company		MT	No	No
-	Lake County Farmers Mutual Insurance Company		MT	No	No
-	Richland Farm Mutual Insurance Company		MT	No	No
-	Tri-County Farmers' Mutual Insurance Company		MT	No	No
-	Westland Farm Mutual Insurance Company		MT	No	No
-	Wheat Growers Farm Mutual Insurance Company		MT	No	No
-	Eadonton Insurance Company		MT	Yes	No
-	Elk Run Insurance Company, Inc.		MT	Yes	No
-	Enterprise Insurance Company, Inc.		MT	Yes	No
-	LIS Financial, Inc.		MT	Yes	No
-	Pacific Re., Inc		MT	Yes	No
-	Roche Captive Insurance Co. of America		MT	Yes	No
-	Allegiance Re, Inc.		MT	Yes	No
-	Pacifica Assurance Company Inc.		MT	Yes	No
-	Risk Managers Insurance Company, Inc.		MT	Yes	No
-	Radigan Insurance Inc.		MT	Yes	No
-	NPIP Re Inc		MT	Yes	No
-	Rocky Mountain Insurance Company		MT	Yes	No
-	Auto Dealers Insurance Company, Inc.		MT	Yes	No
-	Bluestone Risk Management, Inc.		MT	Yes	No
-	EBMS Re, Inc.		MT	Yes	No
-	Golden State Holdings, Inc.		MT	Yes	No
-	Golden State Insurance Company, Inc.		MT	Yes	No
-	Identity Assurance & Management Company		MT	Yes	No
-	Pacific Capital Holdings, Inc.		MT	Yes	No
-	Pacific Capital Insurance Company, Inc.		MT	Yes	No
-	Regent Insurance Company, Inc.		MT	Yes	No

-	Silver Stone Insurance Company, Inc.		MT	Yes	No
-	West Point Holdings, Inc.		MT	Yes	No
-	West Point Insurance Company, Inc.		MT	Yes	No
10034	Farm Bureau Insurance of N. C., Inc.	324	NC	Yes	Yes
10720	Carolina Farmers Mutual Insurance Company		NC	No	No
10844	Builders Mutual Insurance Company	4507	NC	Yes	Yes
10885	Key Risk Insurance Company	98	NC	Yes	No
10941	Forestry Mutual Insurance Company		NC	No	No
11049	Genworth Mortgage Reinsurance Corporation	4011	NC	Yes	No
11545	AIMCO Mutual Insurance Company		NC	No	No
11685	United Guaranty Mortgage Insurance Company	12	NC	Yes	No
11715	United Guaranty Insurance Company	12	NC	Yes	No
11740	United Guaranty Mortgage Insurance Company of North Car	12	NC	Yes	No
11828	Stonewood Insurance Company	3494	NC	Yes	No
12130	New South Insurance Company	79	NC	Yes	No
12288	Fidelis SecureCare of North Carolina, Inc.	3744	NC	Yes	No
12317	Lincoln Mutual Insurance Company		NC	No	No
12508	Coastal Casualty Insurance Company	3911	NC	Yes	No
12617	The Members Insurance Company		NC	Yes	No
12773	Synergy Insurance Company		NC	Yes	No
12962	FirstCarolinaCare Insurance Company, Inc.		NC	Yes	No
12999	Arcadian Health Plan of North Carolina, Inc.	3681	NC	Yes	No
13036	Builders Premier Insurance Company	4507	NC	Yes	Yes
13044	America's 1st Choice Insurance Company of North Carolina Inc.		NC	No	No
13098	First Benefits Insurance Mutual, Inc.		NC	No	No
13162	CAGC Insurance Company		NC	No	No
13190	Alamance Farmers' Mutual Insurance Company		NC	No	No
13234	Wilshire Insurance Company	225	NC	Yes	No
13572	Dealers Choice Mutual Insurance, Incorporated		NC	No	No
13694	First Mortgage Insurance Company	12	NC	Yes	No
13725	Century Mutual Insurance Company		NC	No	No
14842	North Carolina Farm Bureau Mutual Insurance Company	324	NC	Yes	Yes
15873	United Guaranty Residential Insurance Company	12	NC	Yes	No
16659	United Guaranty Commercial Insurance Company of North C	12	NC	Yes	No
16667	United Guaranty Residential Insurance Company of N. C.	12	NC	Yes	No
16675	Genworth Mortgage Insurance Corporation of North Carolina	4011	NC	Yes	No
16683	N. C. Grange Mutual Insurance Company		NC	No	No
17335	Piedmont Mutual Insurance Company		NC	No	No
18759	Genworth Residential Mortgage Assurance Corporation	4011	NC	Yes	No
22635	Discovery Insurance Company		NC	Yes	No
22772	Integon Indemnity Corporation	79	NC	Yes	No
22780	Integon General Insurance Corporation	79	NC	Yes	No
23248	Occidental Fire & Casualty Company of North Carolina	225	NC	Yes	No
23620	Burlington Insurance Company	479	NC	Yes	No
26999	United Guaranty Mortgage Indemnity Company	12	NC	Yes	No
27930	Integon Casualty Insurance Company	79	NC	Yes	No
28452	Republic Mortgage Insurance Company	150	NC	Yes	No
29742	Integon National Insurance Company	79	NC	Yes	No
29823	Genworth Residential Mortgage Insurance Corporation of No	4011	NC	Yes	No
31275	Republic Mortgage Insurance Company of North Carolina	150	NC	Yes	No
31488	Integon Preferred Insurance Company	79	NC	Yes	No
32522	Medical Mutual Insurance Company of North Carolina	184	NC	Yes	Yes
32743	Alliance Mutual Insurance Company		NC	No	No
32972	Universal Insurance Company	168	NC	Yes	No
33090	Medical Security Insurance Company	184	NC	Yes	Yes
36013	Lawyers Mutual Liability Insurance Company of North Carol	3320	NC	Yes	Yes
37095	Genworth Financial Assurance Corporation	4011	NC	Yes	No
37745	Maiden Specialty Insurance Company		NC	Yes	No
38458	Genworth Mortgage Insurance Corporation	4011	NC	Yes	No
40525	United Guaranty Credit Insurance Company	12	NC	Yes	No
41432	Genworth Home Equity Insurance Corporation	4011	NC	Yes	No
42846	Atlantic Casualty Insurance Company	3911	NC	Yes	No
43877	First Mutual Insurance Company		NC	No	No
44377	Halifax Mutual Insurance Company		NC	No	No
50369	Investors Title Insurance Company	627	NC	Yes	No
54631	Blue Cross & Blue Shield of North Carolina	758	NC	Yes	Yes
54658	Delta Dental of North Carolina		NC	No	No
67032	North Carolina Mutual Life Insurance Company		NC	No	No
94072	Securitas Financial Life Insurance Company	20	NC	Yes	No
95103	UnitedHealthcare of North Carolina, Inc.	707	NC	Yes	No
95107	American Dental Plan of North Carolina, Inc.	119	NC	Yes	No
95132	CIGNA HealthCare of North Carolina, Inc.	901	NC	Yes	No
95179	CIGNA Dental Health of North Carolina, Inc.	901	NC	Yes	No
95300	PARTNERS National Health Plans of North Carolina, Inc.	758	NC	Yes	Yes
95321	WellPath Select, Inc.	1137	NC	Yes	No

95343	Aetna Health of the Carolinas Inc.	1	NC	Yes	No
-	Northwest Farmers Mutual Insurance Company		NC	No	No
-	Pitt Farmers Mutual Insurance Company		NC	No	No
-	Rowan Mutual Fire Insurance Company		NC	No	No
CFM	Davidson County Mutual Insurance Company, Inc.		NC	No	No
CFM	Cabarrus Mutual Fire Insurance Company		NC	No	No
CFM	Central Farmers Mutual Insurance Company		NC	No	No
CFM	Edgecombe Farmers Mutual Fire Insurance Co., Inc.		NC	No	No
CFM	Farmers Mutual Fire Insurance Company of Cleveland County		NC	No	No
CFM	Farmers Mutual Fire Insurance Company of Wilkes, Watauga, Ashe, '		NC	No	No
CFM	Farmers Mutual Insurance Company of Granville Person Vance		NC	No	No
NA	Carolinas Roofing & Sheet Metal Contractors SI Fund	NA	NC	No	No
NA	CEC Self-Insurance Fund, Inc.	NA	NC	No	No
NA	NC Chamber of Commerce Self-Insurance Fund	NA	NC	No	No
NA	NCHE Workers' Compensation Fund, Inc.	NA	NC	No	No
NA	NC Operators Self-Insurers Fund	NA	NC	No	No
10717	Aspen Specialty Ins Co		ND	Yes	No
10863	Dakota Fire Ins Co	62	ND	Yes	Yes
11101	Hartland Mut Ins Co		ND	No	Yes
11515	QBE Specialty Ins Co	796	ND	Yes	No
13927	Homesite Ins Co Of The Midwest	501	ND	Yes	No
25224	Great Divide Ins Co	98	ND	Yes	No
32670	Farmers Union Mut Ins Co		ND	No	No
33561	Safecard Serv Ins Co		ND	Yes	No
34592	Nodak Mut Ins Co	3500	ND	Yes	Yes
34606	Center Mut Ins Co		ND	No	No
34991	Genesis Ind Ins Co	31	ND	Yes	No
35416	Us Underwriters Ins Co	31	ND	Yes	No
36940	Indian Harbor Ins Co	1285	ND	Yes	No
38890	Passport Ins Co		ND	No	No
39381	Adriatic Ins Co		ND	Yes	No
40657	Old West Mut Ins Co		ND	No	No
44270	American West Ins Co	3500	ND	Yes	Yes
44350	Health Facilities Ins Exch		ND	No	No
47053	North Dakota Vision Serv Inc		ND	No	No
47054	Dental Serv Corp of ND		ND	No	No
52554	Heart of Amer Hlth Plan		ND	No	No
55891	Noridian Mut Ins Co		ND	No	Yes
65641	Lincoln Mut Life & Cas Ins Co		ND	No	No
67911	Pioneer Mut Life Ins Co	619	ND	Yes	No
69329	Surety Life & Cas Ins Co		ND	No	No
87114	Midwest Intl Life Ins Co		ND	No	No
10348	Arch Reins Co	1279	NE	Yes	No
10349	Acceptance Cas Ins Co	225	NE	Yes	No
10946	Arch Excess & Surplus Ins Co	1279	NE	Yes	No
11304	Global Surety & Ins Co		NE	Yes	No
11371	Great West Cas Co	150	NE	Yes	No
11499	Censtat Cas Co	690	NE	Yes	Yes
11500	Lenders Protection Assur Co RRG		NE	Yes	No
11673	Redwood Fire & Cas Ins Co	31	NE	Yes	No
13100	Omaha Ins Co	261	NE	Yes	Yes
13120	Omaha Life Ins Co	261	NE	Yes	Yes
13682	American Life & Security Corp		NE	Yes	No
13889	Farmers Mut Ins Co Of NE		NE	No	No
16373	Battle Creek Mut Ins Co		NE	Yes	No
16411	Cooperative Mut Ins Co		NE	No	No
18619	Platte River Ins Co	501	NE	Yes	No
19500	Wesco Financial Ins Co	31	NE	Yes	No
19640	Columbia Natl Ins Co	807	NE	Yes	Yes
20010	Acceptance Ind Ins Co	225	NE	Yes	No
20044	Cornhusker Cas Co	31	NE	Yes	No
20079	National Fire & Marine Ins Co	31	NE	Yes	No
20087	National Ind Co	31	NE	Yes	No
20249	Central Natl Ins Co Of Omaha	217	NE	Yes	No
21199	Arch Specialty Ins Co	1279	NE	Yes	No
21326	Empire Fire & Marine Ins Co	212	NE	Yes	No
23264	Inland Ins Co	199	NE	Yes	No
25933	Universal Surety Co	199	NE	Yes	No
27626	Firstcomp Ins Co		NE	Yes	No
27812	Columbia Ins Co	31	NE	Yes	No
29769	Capitol Cas Co		NE	No	No
30830	Arch Ind Ins Co	1279	NE	Yes	No
31119	Medico Ins Co		NE	Yes	No
34274	Central States Ind Co Of Omaha	31	NE	Yes	No
34630	Oak River Ins Co	31	NE	Yes	No

36234	Preferred Professional Ins Co		NE	Yes	No
37958	Acceptance Ins Co		NE	Yes	No
47091	Delta Dental of NE		NE	No	No
50024	Lawyers Title Ins Corp	670	NE	Yes	No
50083	Commonwealth Land Title Ins Co	670	NE	Yes	No
50229	Chicago Title Ins Co	670	NE	Yes	No
51535	Ticor Title Ins Co of FL	670	NE	Yes	No
57320	Woodmen World Life Ins Soc		NE	No	No
60380	American Family Life Assur Co of Col	370	NE	Yes	No
61301	Ameritas Life Ins Corp	943	NE	Yes	No
61751	Central States H & L Co Of Omaha	690	NE	Yes	Yes
62345	Berkshire Hathaway Life Ins Co NE	31	NE	Yes	No
65331	Liberty Natl Life Ins Co	290	NE	Yes	No
65595	Lincoln Benefit Life Co	8	NE	Yes	No
67466	Pacific Life Ins Co	709	NE	Yes	No
67679	American Republic Corp Ins Co	3527	NE	Yes	No
69310	Surety Life Ins Co	8	NE	Yes	No
69868	United Of Omaha Life Ins Co	261	NE	Yes	Yes
70335	West Coast Life Ins Co	458	NE	Yes	No
70629	World Ins Co	3527	NE	Yes	No
71030	Cornhusker Life Ins Co		NE	No	No
71412	Mutual Of Omaha Ins Co	261	NE	Yes	Yes
71439	Assurity Life Ins Co		NE	Yes	No
71471	Ability Ins Co		NE	Yes	No
72125	Physicians Life Ins Co	367	NE	Yes	Yes
72613	USAA Direct Life Ins Co	200	NE	Yes	Yes
72850	United World Life Ins Co	261	NE	Yes	Yes
74233	First Natl Life Ins Co Of USA		NE	Yes	No
74888	First Landmark Life Ins Co		NE	Yes	No
77780	BCBS Of NE		NE	No	No
79987	World Corp Ins Co	3527	NE	Yes	No
80578	Physicians Mut Ins Co	367	NE	Yes	Yes
80837	Union Central Life Ins Co	943	NE	Yes	No
82880	CSI Life Ins Co	31	NE	Yes	No
91472	Globe Life & Accident Ins Co	290	NE	Yes	No
92916	United Amer Ins Co	290	NE	Yes	No
94099	United Investors Life Ins Co	290	NE	Yes	No
95591	United Hlthcare of Midlands Inc	707	NE	Yes	No
95925	Coventry Hlth Care of NE Inc	1137	NE	Yes	No
-	Omni Dental Associates, Inc.		NE	No	No
-	League Association of Risk Manage		NE	No	No
-	NASB all lines interlocal cooperative aggregate pool		NE	No	No
-	Nebraska Community College Ins. Trust		NE	No	No
-	NIRMA I		NE	No	No
-	NIRMA II		NE	No	No
-	Nebraska Association of Resources Districts Intergovernmental Risk M		NE	No	No
-	Cornhusker Mutual Life Association I		NE	No	No
-	Cornhusker Mutual Life Association III		NE	No	No
-	Republican Valley Mutual Protective Association		NE	No	No
-	Boone & Antelope Mutual Insurance Company		NE	No	No
-	Clay County Mutual Insurance Company		NE	No	No
-	Employers Mutual Acceptance Company		NE	No	No
-	Farmers Mutual Fire Ins. Assoc. of Seward Cnty.		NE	No	No
-	Farmers Mutual Home Insurance Company (Hooper)		NE	No	No
-	Farmers Mutual United Insurance Company (WAHOO)		NE	No	No
-	German Farmers Mutual Assess. Ins. Assoc.		NE	No	No
-	German Mutual Ins. Assoc. of Auburn Nebraska		NE	No	No
-	German Mutual Ins. Co. of Dodge Cnty.		NE	No	No
-	Grange Mutual Ins. Co. of Custer Co.		NE	No	No
-	Knox County Farmers Mutual Ins. Co.		NE	No	No
-	Mutual Ins. Co. of Saline & Seward Cnty.		NE	No	No
-	National Plate Glass Mutual Ins. Co.		NE	No	No
-	Nebraska Farmers Mutual Reins. Assoc. (Wahoo reins.)		NE	No	No
-	Norfolk Mutual Insurance Company		NE	No	No
-	Northern Nebraska United Mutual Ins. Co.		NE	No	No
-	Olive Branch Assessment Ins. Society, Inc.		NE	No	No
-	Polk & Butler Mutual Insurance Company		NE	No	No
-	Scandinavian Mutual Ins. Co. of Axtell, Ne.		NE	No	No
-	Scandinavian Mutual Ins. Co. of Polk County		NE	No	No
-	Washington County Mutual Insurance		NE	No	No
-	Western United Mutual Insurance Association		NE	No	No
-	York County Farmers Mutual Ins. Co.		NE	No	No
10135	MVP Hlth Ins Co of NH Inc	1198	NH	Yes	No
10141	MVP Hlth Plan of NH Inc	1198	NH	Yes	No
10205	Mountain Valley Ind Co	3703	NH	Yes	No

10212	Allmerica Fin Alliance Ins Co	88	NH	Yes	No
10690	Allied World Natl Assur Co	3239	NH	Yes	No
10725	Liberty Surplus Ins Corp	111	NH	Yes	No
10815	Verlan Fire Ins Co MD	88	NH	Yes	No
10836	Golden Eagle Ins Corp	111	NH	Yes	No
11030	Memic Ind Co	1332	NH	Yes	Yes
11045	Excelsior Ins Co	111	NH	Yes	No
11705	Hanover NJ Ins Co	88	NH	Yes	No
11746	Liberty Personal Ins Co	111	NH	Yes	No
12696	America First Ins Co	111	NH	Yes	No
12775	Merchants Natl Ins Co	226	NH	Yes	Yes
13027	Covington Specialty Ins Co	501	NH	Yes	No
13147	Hanover Natl Ins Co	88	NH	Yes	No
13196	Western World Ins Co	866	NH	Yes	No
13646	Red Tree Ins Co Inc		NH	Yes	No
20672	Concord Gen Mut Ins Co	45	NH	Yes	Yes
22292	Hanover Ins Co	88	NH	Yes	No
22306	Massachusetts Bay Ins Co	88	NH	Yes	No
22314	RSUI Ind Co	501	NH	Yes	No
22730	Allied World Reins Co	3239	NH	Yes	No
23175	Phenix Mut Fire Ins Co	291	NH	Yes	Yes
23337	American European Ins Co	383	NH	Yes	No
24171	Netherlands Ins Co The	111	NH	Yes	No
24198	Peerless Ins Co	111	NH	Yes	No
24759	Safeco Natl Ins Co	111	NH	Yes	No
25038	North Amer Capacity Ins Co	181	NH	Yes	No
28479	Sunapee Mut Fire Ins Co	45	NH	Yes	Yes
29700	North Amer Elite Ins Co	181	NH	Yes	No
29874	North Amer Specialty Ins Co	181	NH	Yes	No
31325	Acadia Ins Co	98	NH	Yes	No
32778	Washington Intl Ins Co	181	NH	Yes	No
36064	Hanover Amer Ins Co	88	NH	Yes	No
37982	Tudor Ins Co	866	NH	Yes	No
40436	Stratford Ins Co	866	NH	Yes	No
41785	Colorado Cas Ins Co	111	NH	Yes	No
42376	Technology Ins Co Inc	2538	NH	Yes	No
43982	MT WA Assur Corp	415	NH	Yes	No
47079	Delta Dental Plan of NH		NH	No	No
53759	Anthem Hlth Plans of NH	671	NH	Yes	No
56529	ACA Assur		NH	No	No
85189	Investors Consolidated Ins Co	1117	NH	Yes	No
87980	Cigna Ins Grp Inc	901	NH	Yes	No
95493	Cigna Hlthcare NH Inc	901	NH	Yes	No
95527	Matthew Thorton Hlth Plan Inc	671	NH	Yes	No
10100	Palisades Prop & Cas Ins Co	1227	NJ	Yes	Yes
10144	Carecore NJ LLC		NJ	Yes	No
10184	AIG Auto Ins Co of NJ	212	NJ	Yes	No
10448	Cumberland Ins Co Inc	54	NJ	Yes	Yes
10651	AIG Global Trade & Pol Risk Ins Co	12	NJ	Yes	No
10654	Mastercare Ins Co		NJ	Yes	No
10710	American Intl Ins Co Of NJ	212	NJ	Yes	No
10732	New Jersey Cas Ins Co	708	NJ	Yes	Yes
10791	Palisades Ins Co	1227	NJ	Yes	Yes
10928	Eagle Ins Co	515	NJ	Yes	No
10930	High Point Prop & Cas Ins Co	1227	NJ	Yes	Yes
10931	High Point Safety & Ins Co	1227	NJ	Yes	Yes
10933	MIIX Ins Co		NJ	Yes	No
10978	New Jersey Ind Ins Co	708	NJ	Yes	Yes
10994	Founders Ins Co	271	NJ	Yes	Yes
11068	Orthonet of the Mid Atlantic Inc		NJ	Yes	No
11069	American Imaging Mgmt E LLC	671	NJ	Yes	No
11074	Selective Auto Ins Co of NJ	242	NJ	Yes	No
11146	Horizon Hlthcare Dental Inc	1202	NJ	Yes	Yes
11159	Unity DPO Inc		NJ	No	No
11167	Cigna Dental Hlth of NJ Inc	901	NJ	Yes	No
11173	International Hlthcare Serv Inc	85	NJ	Yes	No
11179	Flagship Hlth Systems Inc	2918	NJ	Yes	No
11182	John D Kernan DMD PA		NJ	No	No
11183	Aetna Dental Inc NJ Corp	1	NJ	Yes	No
11195	Dental Delivery Systems Inc		NJ	No	No
11196	Consumer First Ins Co		NJ	Yes	No
11199	Managed Dental Guard Inc	429	NJ	Yes	Yes
11214	Community Dental Assoc		NJ	No	No
11217	Atlantic Southern Dental Found		NJ	Yes	No
11234	Dental Serv Org Inc		NJ	No	No

11239	Statewide DPO Inc		NJ	Yes	No
11241	Dental Grp of NJ Inc		NJ	Yes	No
11244	Union Security DentalCare of NJ Inc	19	NJ	Yes	No
11245	Rutgers Enhanced Ins Co	383	NJ	Yes	No
11246	Group Dental Hlth Administrators Inc		NJ	No	No
11380	Firemans Fund Ind Corp	761	NJ	Yes	No
11410	Drive NJ Ins Co	155	NJ	Yes	No
11453	New Jersey Skylands Ins Co	3341	NJ	Yes	Yes
11454	New Jersey Skylands Ins Assn	3341	NJ	Yes	Yes
11498	MdAdvantage Ins Co of NJ		NJ	Yes	No
11535	Conventus Inter Ins Exch		NJ	No	No
11539	New Jersey Physicians United Recip		NJ	No	No
11576	GSA Ins Co	515	NJ	Yes	No
11592	International Fidelity Ins Co		NJ	Yes	No
11818	Taxisure Exch		NJ	No	No
11866	American Specialty Hlth ODS of NJ	3502	NJ	Yes	No
12122	New Jersey Manufacturers Ins Co	708	NJ	Yes	Yes
12150	First Founders Assur Co		NJ	Yes	No
12212	Teachers Auto Ins Co	1227	NJ	Yes	Yes
12213	Dental Practice Assn of NJ Inc		NJ	Yes	No
12302	Progressive Freedom Ins Co	155	NJ	Yes	No
12357	Twin Lights Ins Co	1227	NJ	Yes	Yes
12572	Selective Ins Co Of Amer	242	NJ	Yes	No
12584	Triad Hlthcare of NJ IPA Inc		NJ	Yes	No
12605	Prism Hlth Networks of NJ Inc		NJ	No	No
12632	Magellan Behavioral Hlth of NJ LLC	1260	NJ	Yes	No
12830	Healthplex of NJ Inc	85	NJ	Yes	No
12872	Landmark Hlthcare NJ Inc		NJ	Yes	No
12965	Bondex Ins Co		NJ	Yes	No
13020	Wellcare Hlth Plans of NJ Inc	1199	NJ	Yes	No
13035	Healthfirst Healthplan of NJ Inc		NJ	Yes	No
13684	Cumberland Mut Fire Ins Co	54	NJ	Yes	Yes
13854	Farmers Mut Fire Ins Co of Salem Cn		NJ	No	No
13900	ARI Mut Ins Co	848	NJ	Yes	Yes
14800	Progressive Garden State Ins Co	155	NJ	Yes	No
14940	First Jersey Cas Ins Co Inc		NJ	Yes	No
15586	Preserver Ins Co	3703	NJ	Yes	No
15750	Fidelity Mohawk Ins Co	762	NJ	Yes	Yes
16446	Farmers Ins Co of Flemington		NJ	No	No
16454	Franklin Mut Ins Co	762	NJ	Yes	Yes
20107	Atradius Trade Credit Ins Co NJ	181	NJ	Yes	No
20532	Clarendon Natl Ins Co	517	NJ	Yes	No
21105	North River Ins Co	158	NJ	Yes	No
21806	Harbor Specialty Ins Co	517	NJ	Yes	No
21946	Camden Fire Ins Assoc	1129	NJ	Yes	No
22050	Palisades Safety & Ins Assoc	1227	NJ	Yes	Yes
22937	National Consumer Ins Co	515	NJ	Yes	No
23876	Mapfre Ins Co	411	NJ	Yes	No
24643	Newark Ins Co	515	NJ	Yes	No
26140	American Millennium Ins Co		NJ	No	No
26174	Security Ind Ins Co		NJ	No	No
26301	Selective Way Ins Co	242	NJ	Yes	No
28240	The Serv Ins Co Inc		NJ	No	No
28924	Garden State Ind Co Inc		NJ	No	No
28959	High Point Preferred Ins Co	1227	NJ	Yes	Yes
29521	Salem Cnty Mut Fire Ins Co		NJ	No	No
29750	Kodiak Ins Co	3703	NJ	Yes	No
30660	Home State In Co	117	NJ	Yes	No
31062	IFA Ins Co		NJ	Yes	No
34509	Rider Ins Co		NJ	No	No
35432	New Jersey Re Ins Co	708	NJ	Yes	Yes
37028	Citizens United Recip Exch		NJ	No	No
37680	ARI Cas Co	848	NJ	Yes	Yes
37699	FMI Ins Co	762	NJ	Yes	Yes
38326	First Ind Of Amer Ins Co		NJ	Yes	No
38938	Atlantic Employers Ins Co	626	NJ	Yes	No
41378	Rutgers Cas Ins Co	383	NJ	Yes	No
41386	Chubb Ins Co Of NJ	38	NJ	Yes	No
42226	Princeton Ins Co	1210	NJ	Yes	Yes
42471	Crum & Forster Ins Co	158	NJ	Yes	No
42625	Continental Ins Co Of NJ	218	NJ	Yes	No
42900	Harleysville Ins Co Of NJ	253	NJ	Yes	Yes
42960	AAA Mid Atlantic Ins Co Of NJ	771	NJ	Yes	No
43095	Clarendon Amer Ins Co	517	NJ	Yes	No
43540	Mercer Ins Co Of NJ Inc	1114	NJ	Yes	No

51187	New Jersey Title Ins Co	4255	NJ	Yes	No
51195	Continental Title Ins Co	670	NJ	Yes	No
55069	Horizon Hlthcare Serv Inc	1202	NJ	Yes	Yes
55085	Delta Dental of NJ Inc	2918	NJ	Yes	No
57150	Association Of The Sons Of Poland		NJ	No	No
57193	Slovak Catholic Sokol		NJ	No	No
57207	Slovak Gymnastic Union Sokol Usa		NJ	No	No
57215	Ukrainian Natl Assn Inc		NJ	No	No
60058	HIP Ins Co Of NJ Inc	1127	NJ	Yes	No
60061	Amerihealth Ins Co Of NJ	936	NJ	Yes	No
68241	Prudential Ins Co Of Amer	304	NJ	Yes	No
95287	Aetna Hlth Inc NJ Corp	1	NJ	Yes	No
95351	Health Net Of NJ Inc	707	NJ	Yes	No
95373	AMERIGROUP NJ Inc	1156	NJ	Yes	No
95470	Hip Hlth Plan of NJ Inc	1127	NJ	Yes	No
95497	Americhoice of NJ Inc	707	NJ	Yes	No
95500	Cigna Hlthcare of NJ Inc	901	NJ	Yes	No
95503	University Hlth Plans Inc	1295	NJ	Yes	No
95506	Oxford Hlth Plans NJ Inc	707	NJ	Yes	No
95529	Horizon Hlthcare of NJ Inc	1202	NJ	Yes	Yes
97195	Pruco Life Ins Co Of NJ	304	NJ	Yes	No
10150	ValueOptions of NM Inc	965	NM	Yes	No
10177	Mountain States Ind Co	791	NM	Yes	Yes
10207	New Mexico SW Cas Co	1112	NM	Yes	Yes
11504	Presybyterian Ins Co Inc	481	NM	Yes	No
12242	New Mexico Prop & Cas Co		NM	Yes	No
12265	Lovelace Ins Co Inc	3679	NM	Yes	No
12354	AMERIGROUP Comm Care of NM Inc	1156	NM	Yes	No
12977	Physicians Hlth Choice of NM Inc	4423	NM	Yes	No
13214	Evercare of New Mexico Inc	707	NM	Yes	No
13673	New Mexico Assur Co	1112	NM	Yes	Yes
13674	New Mexico Employers Assur Co	1112	NM	Yes	Yes
13675	New Mexico Premier Ins Co	1112	NM	Yes	Yes
14648	Mountain States Mut Cas Co	791	NM	Yes	Yes
23051	New Mexico Foundation Ins Co	1112	NM	Yes	Yes
27499	Southwest Gen Ins Co		NM	Yes	No
28495	Butte Mut Ins Co		NM	No	No
40627	New Mexico Mut Cas Co	1112	NM	Yes	Yes
47001	Cigna Dental Hlth of NM Inc	901	NM	Yes	No
47042	United Dental Care of NM Inc	19	NM	Yes	No
47092	Alpha Dental of NM Inc	2479	NM	Yes	No
47287	Delta Dental Plan of NM Inc		NM	Yes	No
91448	Southwest Credit Life Inc		NM	Yes	No
95330	Presbyterian Hlth Plan Inc	481	NM	Yes	No
95739	Molina Hlthcare of NM	1531	NM	Yes	No
95808	Lovelace Sandia Hlth Systems Inc	3679	NM	Yes	No
10007	Nevada Gen Ins Co		NV	Yes	No
10008	Western Ins Co	4641	NV	Yes	No
10228	First NV Ins Co		NV	No	No
10319	Broward Factory Serv Inc		NV	Yes	No
10640	Employers Ins Co Of NV	3363	NV	Yes	No
11020	Nevada Contractors Ins Co Inc	1328	NV	Yes	No
11025	Builders Ins Co Inc	1328	NV	Yes	No
11033	Automotive Underwriters Ins Co A RRG		NV	Yes	No
11079	Saint Marys Preferred Hlth Ins Co	2418	NV	Yes	No
11145	Golden Ins Co RRG		NV	No	No
11165	Nevada Capital Ins Co	802	NV	Yes	No
11260	Nevada Mut Ins Co Inc		NV	No	No
11552	Health Plan of NV Lab Serv	707	NV	Yes	No
11553	Health Plan of NV Inc Mental Hlth	707	NV	Yes	No
11714	Emergency Physicians Ins Co RRG		NV	No	No
11794	Contractors Liab Ins Co RRG		NV	No	No
11838	Summerlin Life & Hlth Ins Co		NV	Yes	No
11855	Primero Ins Co		NV	Yes	No
11947	Lewis & Clark LTC RRG Inc		NV	No	No
11950	Home Construction Ins Co RRG		NV	No	No
11987	TriState Medical Ins Co RRG		NV	No	No
12003	Emergency Medicine Professional Asr		NV	No	No
12230	Nevada Direct Ins Co		NV	No	No
12235	National Builders & Contractors Ins		NV	No	No
12255	Health Facilities of CA Mut Ins Co		NV	Yes	No
12263	Health Future Ins Exch RRG		NV	No	No
12338	Sequoia Ind Co	9	NV	Yes	No
12350	Physicians Compliance Lia Ins Co RRG		NV	No	No
12531	Physhield Ins Exch a RRG		NV	No	No

12539	Nevada Docs Medical RRG Inc		NV	No	No
12586	AMERIGROUP NV Inc	1156	NV	Yes	No
12594	JM Woodworth RRG Inc		NV	No	No
12613	Premier Physicians Ins Co Inc a RRG		NV	No	No
12746	Physicians Ind RRG		NV	No	No
12783	Pioneer Military Ins Co		NV	Yes	No
12836	Financial Advisors Assur Select RRG		NV	No	No
12838	Independent NV Doctors Ins Exch		NV	No	No
12899	Sophia Palmer nurses RRG Inc		NV	No	No
12905	Molina Hlthcare of NV Inc	1531	NV	Yes	No
12915	Urgent Care Assur Co RRG Inc		NV	No	No
12988	Scrubs Mut Assur Co RRG		NV	No	No
13010	Bonded Builders Ins Co RRG		NV	Yes	No
13014	Lancet Ind RRG Inc		NV	No	No
13177	ARCOA RRG Inc		NV	Yes	No
13179	ProAir RRG Inc		NV	No	No
13191	Western Bonding Co	4641	NV	Yes	No
13566	Liberty Dental Plan of NV Inc	4692	NV	Yes	No
13600	Black Diamond Ins Co Inc		NV	No	No
13605	CareMore Hlth Plan of NV	4688	NV	Yes	No
19020	Bell United Ins Co		NV	Yes	No
19089	Ponderosa Ins Co		NV	No	No
23479	National Home Warranty Inc		NV	Yes	No
48305	Hometown Hlth Providers Ins Co		NV	Yes	No
48321	Vision Serv Plan Inc	1189	NV	Yes	No
95244	Nevada Care Inc		NV	Yes	No
95350	Hometown Hlth Plan Inc		NV	Yes	No
95685	Pacificare Of NV Inc	707	NV	Yes	No
95747	Safeguard Hlth Plans Inc	241	NV	Yes	No
95758	Nevada Pacific Dental Inc	707	NV	Yes	No
95778	Alpha Dental of NV Inc	2479	NV	Yes	No
95793	Saint Marys Hlth First	2418	NV	Yes	No
96342	Health Plan Of NV	707	NV	Yes	No
10006	Partnerre Ins Co Of NY	3483	NY	Yes	No
10021	Assured Guar Mortgage Ins Co	194	NY	Yes	No
10022	Countryway Ins Co	542	NY	Yes	No
10025	Community Mut Ins Co		NY	No	No
10088	Kensington Ins Co		NY	Yes	No
10093	National Income Life Ins Co	290	NY	Yes	No
10097	Balboa Life Ins Co Of NY	1281	NY	Yes	No
10243	National Continental Ins Co	155	NY	Yes	No
10362	Atrium Ins Corp		NY	Yes	No
10364	Genesee Patrons Coop Ins Co		NY	No	No
10365	Pittstownco Operative Fire Ins Co		NY	No	No
10368	Sauquoit Valley Ins Co		NY	No	No
10369	Walton Coop Fire Ins Co		NY	No	No
10370	Washington Cnty Coop Ins		NY	No	No
10371	Broome Co Operative Ins Co		NY	No	No
10372	Chautauqua Patrons Ins Assoc		NY	No	No
10374	Erie & Niagra Ins Assoc		NY	No	No
10376	Farmers Mut Ins Co Of Milan Pine		NY	No	No
10377	Farmers Town Mut Ins Co Of Clinton		NY	No	No
10378	Franklin Fire Ins Co		NY	No	No
10379	Hartwick Town Ins Co		NY	No	No
10380	Leatherstocking Coop Ins Co		NY	No	No
10381	Meredith Ins Co		NY	No	No
10413	Usagencies Direct Ins Co	3596	NY	Yes	No
10645	Drivers Ins Co		NY	Yes	No
10669	Church Ins Co	344	NY	Yes	No
10687	Utica Natl Assur Co	201	NY	Yes	Yes
10709	Goldstreet Ins Co		NY	Yes	No
10762	New York Transportation Ins Corp		NY	No	No
10811	Response Ind Co	215	NY	Yes	No
10839	Countrywide Ins Co		NY	No	No
10881	Unitrin Advantage Ins Co	215	NY	Yes	No
10884	Wellcare Hlth Ins of NY Inc	1199	NY	Yes	No
10923	Autoglass Ins Co		NY	No	No
10936	Seneca Ins Co Inc	158	NY	Yes	No
10945	TM Cas Ins Co	3098	NY	Yes	No
10982	Long Island Ins Co		NY	No	No
10986	Homesite Ins Co Of NY	501	NY	Yes	No
11024	Strathmore Ins Co	222	NY	Yes	Yes
11037	Eveready Ins Co		NY	No	No
11092	Global Liberty Ins Co of NY		NY	Yes	No
11095	Neighborhood Hlth Providers LLC	4032	NY	Yes	No

11105	A Central Ins Co	2518	NY	Yes	No
11125	MVP Hlth Ins Co	1198	NY	Yes	No
11126	Sompo Japan Ins Co of Amer	3219	NY	Yes	Yes
11135	American Equity Investment Life Ins	2658	NY	Yes	No
11172	Healthplex Ins Co	85	NY	Yes	No
11231	Generali Us Branch	1169	NY	Yes	No
11266	Global Reins Corp US Branch	604	NY	Yes	No
11591	First Berkshire Hathaway Life Ins Co	31	NY	Yes	No
11596	Unimerica Life Ins Co of NY	707	NY	Yes	No
11630	Jefferson Ins Co	761	NY	Yes	No
11787	First Mut Transportation Assur Co		NY	Yes	No
11790	Midtown Ins Co		NY	Yes	No
11791	Moodys Assur Co Inc		NY	Yes	No
11792	Sammarnick Ins Corp		NY	Yes	No
11793	TSI Ins Inc		NY	Yes	No
11812	Haversine Ins Co		NY	Yes	No
11849	Clove Park Ins Co		NY	Yes	No
11850	Ports Ins Co		NY	Yes	No
11856	PXC Inc		NY	Yes	No
11857	Bolton Ins Co		NY	Yes	No
11869	Premier Mgmt Ins Inc		NY	Yes	No
11870	Black Ridge Ins Corp		NY	Yes	No
11874	LCT Ins Co		NY	Yes	No
11952	Ecclesia Assur Co		NY	Yes	No
12002	Locust Street Ins Co		NY	Yes	No
12041	MBIA Ins Corp	528	NY	Yes	No
12144	Paychex Ins Concepts Inc		NY	Yes	No
12170	Safe Sat of NY Inc		NY	Yes	No
12190	American Pet Ins Co		NY	Yes	No
12192	Peter Turner Ins Co		NY	Yes	No
12218	Madison Ins Co Inc		NY	Yes	No
12221	WTC Captive Ins Co Inc		NY	Yes	No
12227	HCC Ins Co Inc		NY	Yes	No
12285	Niagara Life & Hlth Ins Co	661	NY	Yes	Yes
12476	Queensbrook NY Inc		NY	Yes	No
12477	Blackrock Ins Corp		NY	Yes	No
12478	AGP Serv Corp		NY	Yes	No
12480	Sentinel Protection & Ind Co		NY	Yes	No
12481	Gentiva Ins Corp		NY	Yes	No
12491	Rochdale Ins Co Of NY	2538	NY	Yes	No
12513	Professional Liab Ins Co Of Amer		NY	Yes	No
12519	Healthcare Professional Ins Co Inc	3951	NY	Yes	No
12583	Adirondack Ins Exch		NY	No	No
12600	ARIS Title Ins Co		NY	Yes	No
12603	MWD Ins Co		NY	Yes	No
12634	Humana Ins Co of NY	119	NY	Yes	No
12744	Mainland Ins Co		NY	Yes	No
12745	Belmont Ins Co		NY	Yes	No
12776	Senior Whole Hlth of NY Inc		NY	Yes	No
12777	Chubb Ind Ins Co	38	NY	Yes	No
12781	Seymour Ins Co		NY	Yes	No
12815	Financial Guar Ins Co	1135	NY	Yes	No
12828	RVC Ins Co Inc		NY	Yes	No
12885	St Clair Ins Co		NY	Yes	No
12895	Global Ins & Ind Co Ltd		NY	Yes	No
12901	Merchants Preferred Ins Co	226	NY	Yes	Yes
12904	Tokio Marine & Nichido Fire Ins Co	3098	NY	Yes	No
12942	VNS Choice		NY	Yes	No
12945	The Church Ins Co of NY		NY	Yes	No
12970	Touchstone Hlth HMO Inc		NY	Yes	No
12976	Catholic Special Needs Plan LLC		NY	Yes	No
13007	RP Captive Ins Co Inc		NY	Yes	No
13008	Clam Shell Ins Co Inc		NY	Yes	No
13049	Park Ins Co		NY	Yes	No
13065	1177 Ins Co Inc		NY	Yes	No
13066	DMB&B USA Ins Inc		NY	Yes	No
13070	Berkshire Hathaway Assur Corp	31	NY	Yes	No
13140	RF Casualty Ins Co		NY	Yes	No
13169	Wall & Broad Ins Co		NY	Yes	No
13171	News Corp Ins Co Inc		NY	Yes	No
13180	Imperial Assur Co Inc		NY	Yes	No
13366	American Steamship Owners Mut Prot		NY	No	No
13553	Terminus Ins Inc		NY	Yes	No
13558	Arcadian Health Plan of NY Inc	3681	NY	Yes	No
13559	Municipal & Infrastructure Assur Cor		NY	Yes	No

13564	Freelancers Ins Co Inc		NY	Yes	No
13568	RelSure Amer Inc		NY	Yes	No
13573	Anthem Life & Disability Ins Co	671	NY	Yes	No
13588	VantisLife Ins Co of NY	4668	NY	Yes	Yes
13608	FDM Preferred Ins Co Inc	4671	NY	Yes	Yes
13610	Fire Districts Ins Co Inc	4671	NY	Yes	Yes
13633	Colonial Coop Ins Co		NY	No	No
13653	Trustmark Life Ins Co of NY	276	NY	Yes	No
13666	Syncora Capital Assur Inc	4676	NY	Yes	No
13668	Kingstone Ins Co		NY	Yes	No
13691	Quality Hlth Plans of NY Inc	4685	NY	Yes	No
13699	Barclays Ins US Inc		NY	Yes	No
13700	Hamilton Ins Corp		NY	Yes	No
13705	UHAB Mut Ins Co		NY	No	No
13723	CIFG Guar Inc	4687	NY	Yes	No
13730	Selective Ins Co Of NY	242	NY	Yes	No
13747	Eden Ins Co Inc		NY	Yes	No
13803	Farm Family Cas Ins Co	408	NY	Yes	Yes
13919	Dryden Mut Ins Co		NY	No	No
14311	Interboro Ins Co		NY	Yes	No
14834	New York Central Mut Fire Ins Co	2518	NY	Yes	No
14915	Otsego Mut Fire Ins Co		NY	No	No
15024	Preferred Mut Ins Co		NY	No	No
15059	Public Serv Mut Ins Co	853	NY	Yes	Yes
15113	Security Mut Ins Co		NY	No	No
15210	Sterling Ins Co		NY	No	No
15326	Utica First Ins Co		NY	No	No
15334	Alliance Natl Ins Co		NY	Yes	No
16063	Unitrin Auto & Home Ins Co	215	NY	Yes	No
16233	Erie Ins Co Of NY	213	NY	Yes	No
16250	United Frontier Mut Ins Co		NY	No	No
16489	Associated Mut Ins Co		NY	No	No
16535	Zurich Amer Ins Co	212	NY	Yes	No
16578	Fidelity Natl Prop & Cas Ins Co	670	NY	Yes	No
16608	New York Marine & Gen Ins Co	256	NY	Yes	No
16616	American Transit Ins Co		NY	Yes	No
17205	Castlepoint Ins Co	3703	NY	Yes	No
18287	Assured Guar Municipal Corp	194	NY	Yes	No
18376	Hermitage Ins Co	3703	NY	Yes	No
19305	Assurance Co Of Amer	212	NY	Yes	No
19372	Northern Ins Co Of NY	212	NY	Yes	No
19380	American Home Assur Co	12	NY	Yes	No
19399	AIU Ins Co	12	NY	Yes	No
19410	Commerce & Industry Ins Co	12	NY	Yes	No
19453	Transatlantic Reins Co	12	NY	Yes	No
19895	Atlantic Mut Ins Co	24	NY	Yes	Yes
19909	Centennial Ins Co	24	NY	Yes	Yes
19917	Liberty Ins Underwriters Inc	111	NY	Yes	No
20273	WRM Amer Ind Co Inc		NY	Yes	No
20311	Syncora Guar Inc	4676	NY	Yes	No
20362	Mitsui Sumitomo Ins Co of Amer	2978	NY	Yes	No
20370	AXIS Reins Co	3416	NY	Yes	No
20397	Vigilant Ins Co	38	NY	Yes	No
20583	XL Reins Amer Inc	1285	NY	Yes	No
20690	New York Municipal Ins Recip		NY	No	No
20877	Capital Markets Assur Corp	528	NY	Yes	No
20931	Atlanta Intl Ins Co	31	NY	Yes	No
21032	Global Reins Corp Of Amer	604	NY	Yes	No
21121	Westchester Fire Ins Co	626	NY	Yes	No
21350	Empire Ins Co		NY	Yes	No
21640	CM Ins Co Inc		NY	Yes	No
21989	Compass Ins Co	143	NY	Yes	No
22136	Great Amer Ins Co of NY	84	NY	Yes	No
22144	Constellation Rein Co		NY	Yes	No
22187	Greater NY Mut Ins Co	222	NY	Yes	Yes
22195	Insurance Co Of Greater NY	222	NY	Yes	Yes
22551	Mitsui Sumitomo Ins USA Inc	2978	NY	Yes	No
22870	Ontario Ins Co		NY	No	No
23060	Tri State Consumer Ins Co		NY	Yes	No
23329	Merchants Mut Ins Co	226	NY	Yes	Yes
23825	National Public Finance Guar Corp	528	NY	Yes	No
24309	Hereford Ins Co		NY	Yes	No
24899	Alea North America Ins Co		NY	Yes	No
25275	State Wide Ins Co	816	NY	Yes	No
25364	Swiss Reins Amer Corp	181	NY	Yes	No

25569	Gotham Ins Co	256	NY	Yes	No
25771	CIFG Assur N Amer Inc	4687	NY	Yes	No
25909	Unitrin Preferred Ins Co	215	NY	Yes	No
25917	Executive Ins Co		NY	Yes	No
25976	Utica Mut Ins Co	201	NY	Yes	Yes
25984	Graphic Arts Mut Ins Co	201	NY	Yes	Yes
26247	American Guar & Liab Ins	212	NY	Yes	No
26760	Fulmont Mut Ins Co		NY	No	No
26818	Midstate Mut Ins Co		NY	No	No
26835	Midrox Ins Co		NY	No	No
27073	Nipponkoa Ins Co Ltd US Br		NY	No	No
27154	Atlantic Specialty Ins Co	1129	NY	Yes	No
28630	Guilderland Reins Co	1316	NY	Yes	No
29530	AXA Art Ins Corp		NY	Yes	No
29670	Cherry Valley Coop Ins Co		NY	Yes	No
29963	United Farm Family Ins Co	408	NY	Yes	Yes
29998	Upper Hudson Natl Ins Co		NY	No	No
30058	Scor Reins Co	749	NY	Yes	No
30175	Oriska Ins Co	3384	NY	Yes	No
30317	Hospitals Ins Co Inc		NY	Yes	No
30350	Otsego Co Patrons Coop Fire Relief		NY	No	No
30449	Madison Mut Ins Co		NY	No	No
30970	Allegany Co-Op Ins Co		NY	No	No
31224	Hanys Member Hosp Self Ins Trust	3951	NY	Yes	No
31399	United Intl Ins Co	383	NY	Yes	No
32190	Constitution Ins Co		NY	Yes	No
32220	American Intl Ins Co	212	NY	Yes	No
32301	TNUS Ins Co	3098	NY	Yes	No
33022	AXA Ins Co	968	NY	Yes	No
33235	Harleysville Ins Co of NY	253	NY	Yes	Yes
33421	Trygg Hansa Ins Co Ltd Us Branch		NY	Yes	No
34231	Medical Liab Mut Ins Co	1210	NY	Yes	Yes
34266	Frontier Ins Co	456	NY	Yes	No
34452	Homeland Ins Co of NY	1129	NY	Yes	No
34460	Autoone Ins Co	1129	NY	Yes	No
34479	AutoOne Select Ins Co	1129	NY	Yes	No
34720	Medco Containment Ins Co Of NY	433	NY	Yes	No
34843	New York Schools Ins Recip		NY	No	No
34860	International Credit of N Amer Reins		NY	Yes	No
34886	AIOI Ins Co Of Amer	4513	NY	Yes	No
35157	Putnam Reins Co	12	NY	Yes	No
35866	Mid Hudson Co Operative Ins Co		NY	No	No
36030	Maya Assur Co		NY	Yes	No
36048	Unione Italiana Reins Co Of Amer	31	NY	Yes	No
36056	Navigators Specialty Ins Co	510	NY	Yes	No
36102	State Ins Fund		NY	No	No
36103	State Ins Fund Disability Benefits		NY	No	No
36250	Radian Asset Assur Inc	766	NY	Yes	No
36285	United Amer Ins Co		NY	Yes	No
37079	Hudson Specialty Ins Co	158	NY	Yes	No
37400	Fire Districts Of NY Mut Ins Co Inc	4671	NY	Yes	Yes
37800	Leading Ins Grp Ins Co Ltd		NY	No	No
38148	North Sea Ins Co	456	NY	Yes	No
38300	Samsung Fire & Marine Ins Co Ltd		NY	n/a	No
38512	Rampart Ins Co		NY	Yes	No
38636	Partner Reins Co Of The US	3483	NY	Yes	No
38776	White Mountains Reins Co of Amer	1129	NY	Yes	No
38946	Paladin Reins Corp	821	NY	Yes	No
38997	Sompo Japan Fire & Mar Ins Co Amer	3219	NY	Yes	Yes
39187	Suecia Ins Co		NY	Yes	No
39322	General Security Natl Ins Co	749	NY	Yes	No
40177	Paramount Ins Co	853	NY	Yes	Yes
40193	X L Ins Co Of NY	1285	NY	Yes	No
40223	ICM Ins Co		NY	Yes	No
41238	Trans Pacific Ins Co	3098	NY	Yes	No
41467	Physicians Recip Insurers		NY	No	No
42307	Navigators Ins Co	510	NY	Yes	No
42544	Academic Hlth Professionals Ins		NY	No	No
42552	Nova Cas Co	88	NY	Yes	No
43290	Wayne Coop Ins Co		NY	No	No
43320	Eastern Mut Ins Co	195	NY	Yes	Yes
43800	Callicoon Co Operative Ins Co		NY	No	No
43826	Central Co Operative Ins Co		NY	No	No
43834	Claverack Coop Ins Co		NY	No	No
43842	Finger Lakes Fire & Cas Ins Co		NY	No	No

43850	Oswego Cnty Mut Ins Co		NY	No	No
43869	North Country Ins Co		NY	No	No
43893	Health Net Ins Co NY Inc	707	NY	Yes	No
43893	Health Net Insurance of NY	707	NY	Yes	No
44091	Nissay Dowa Genl Ins Co Ltd Us Br		NY	Yes	Yes
44300	Tower Ins Co Of NY	3703	NY	Yes	No
47027	CDPHP Universal Benefits Inc		NY	Yes	No
47029	Eastern Vision Serv Plan Inc	1189	NY	Yes	No
47034	Independent Hlth Benefits Corp		NY	Yes	No
47062	MVP Hlth Serv Corp	1198	NY	Yes	No
47112	Dentcare Delivery Systems Inc		NY	No	No
49964	Preferred Assur Co	1198	NY	Yes	No
50028	Ace Capital Title Reins Co	626	NY	Yes	No
50029	Washington Title Ins Co		NY	Yes	No
51020	National Title Ins Of NY Inc		NY	Yes	No
51039	First Amer Title Ins Co of NY	70	NY	Yes	No
51101	Nations Title Ins Of NY Inc	670	NY	Yes	No
51420	Stewart Title Ins Co	340	NY	Yes	No
51578	First Atlantic Title Ins Corp		NY	No	No
52624	Atlantis Hlth Plan		NY	Yes	No
55093	Empire Healthchoice Assur Inc	671	NY	Yes	No
55107	Excellus Hlth Plan Inc	1186	NY	Yes	No
55204	Health Now NY Inc		NY	Yes	No
55204	Health Now NY Inc		NY	Yes	No
55239	Group Hlth Inc	1304	NY	Yes	No
55247	Health Ins Plan of Greater NY	1127	NY	Yes	No
55263	Delta Dental of NY		NY	No	No
55271	Pupil Benefits Plan Inc		NY	No	No
57223	Baptist Life Assn		NY	No	No
57282	Polish Union Of Amer		NY	No	No
57290	Workmens Benefit Fund Of The USA		NY	No	No
58068	Independent Order Of Foresters Us Br		NY	Yes	No
60033	First Ameritas Life Ins Corp of NY	943	NY	Yes	No
60049	PerfectHealth Ins Co	1127	NY	Yes	No
60084	First Security Benefit Life & Ann	870	NY	Yes	No
60093	United Hlthcare Ins Co Of NY	707	NY	Yes	No
60094	HIP Ins Co Of NY	1127	NY	Yes	No
60140	Jackson Natl Life Ins Co Of NY	918	NY	Yes	No
60142	TIAA Cref Life Ins Co	1216	NY	Yes	No
60176	SBLI USA Mut Life Ins Co Inc	1347	NY	Yes	Yes
60213	HM Life Ins Co Of NY	812	NY	Yes	Yes
60216	Amalgamated Life Ins Co		NY	Yes	No
60222	United Concordia Ins Co Of NY	812	NY	Yes	Yes
60228	USAA Life Ins Co Of NY	200	NY	Yes	Yes
60243	American Independent Ntwrk Ins Co NY	810	NY	Yes	No
60526	American Family Life Assur Co of NY	370	NY	Yes	No
60607	American Intl Life Assur Co of NY	12	NY	Yes	No
60704	Wilton Reassur Life Co of NY	4213	NY	Yes	No
60992	First Metlife Investors Ins Co	241	NY	Yes	No
61360	Reliastar Life Ins Co Of NY	229	NY	Yes	No
61409	National Benefit Life Ins Co	41	NY	Yes	No
61409	National Benefit Life Ins Co	41	NY	Yes	No
61875	Church Life Ins Corp	344	NY	Yes	No
62057	Lincoln Life & Ann Co of NY	20	NY	Yes	No
62057	Lincoln Life & Ann Co of NY	20	NY	Yes	No
62103	Columbian Mut Life Ins Co	535	NY	Yes	Yes
62243	Companion Life Ins Co	261	NY	Yes	Yes
62944	AXA Equitable Life Ins Co	968	NY	Yes	No
63126	Farm Family Life Ins Co	408	NY	Yes	Yes
63495	First Investors Life Ins Co		NY	Yes	No
63932	Aviva Life & Ann Co of NY	44	NY	Yes	No
64190	Allianz Life Ins Co Of NY	761	NY	Yes	No
64246	Guardian Life Ins Co Of Amer	429	NY	Yes	Yes
64297	First Unum Life Ins Co	565	NY	Yes	No
64548	Cigna Life Ins Co Of NY	901	NY	Yes	No
64831	Intramerica Life Ins Co	8	NY	Yes	No
65870	Manhattan Life Ins Co	1117	NY	Yes	No
65978	Metropolitan Life Ins Co	241	NY	Yes	No
66230	William Penn Life Ins Co Of NY	872	NY	Yes	No
66370	Mony Life Ins Co	968	NY	Yes	No
66915	New York Life Ins Co	826	NY	Yes	No
67288	Great Amer Life Ins Co Of NY	84	NY	Yes	No
67814	Phoenix Life Ins Co	403	NY	Yes	No
68039	Presidential Life Ins Co		NY	Yes	No
68560	Bankers Conseco Life Ins Co	233	NY	Yes	No

68772	Security Mut Life Ins Co Of NY		NY	No	No
68829	Sentry Life Ins Co Of NY	169	NY	Yes	Yes
69078	Standard Security Life Ins Co Of NY	450	NY	Yes	No
69345	Teachers Ins & Ann Assoc Of Amer	1216	NY	Yes	No
69434	OM Fin Life Ins Co of NY	2598	NY	Yes	No
70106	United States Life Ins Co In NYC	12	NY	Yes	No
70114	Unity Mut Life Ins Co	786	NY	Yes	No
70688	Transamerica Financial Life Ins Co	468	NY	Yes	No
70874	Allstate Life Ins Co Of NY	8	NY	Yes	No
70939	Gerber Life Ins Co	4483	NY	Yes	No
71005	First Reliance Standard Life Ins Co	74	NY	Yes	No
71228	Empire Fidelity Investments L I C	981	NY	Yes	No
72664	Sun Life Ins & Ann Co of NY	549	NY	Yes	No
72990	Genworth Life Ins Co of NY	4011	NY	Yes	No
73059	Phoenix Life & Reassur Co Of NY	403	NY	Yes	No
74101	First United Amer Life Ins Co	290	NY	Yes	No
75264	National Integrity Life Ins Co	836	NY	Yes	No
78026	Oxford Hlth Ins Inc	707	NY	Yes	No
78140	Life Ins Co Of Boston & NY	581	NY	Yes	Yes
78417	First Symetra Natl Life Ins Co of NY	1129	NY	Yes	No
78697	Combined Life Ins Co Of NY	626	NY	Yes	No
79340	First Central Natl Life Ins Co NY	352	NY	Yes	No
79359	First Great W Life & Ann Ins Co	769	NY	Yes	No
80594	Riversource Life Ins Co Of NY	4	NY	Yes	No
80624	American Progressive L&H Ins Of NY	953	NY	Yes	No
81418	American Medical & Life Ins Co		NY	Yes	No
81426	Commercial Travelers Mut Ins Co	560	NY	Yes	Yes
81434	First Rehab Life Ins Co Of Amer		NY	Yes	No
81442	Monitor Life Ins Co Of NY	560	NY	Yes	Yes
81477	Union Security Life Ins Co of NY	19	NY	Yes	No
82848	ML Life Ins Co of NY	468	NY	Yes	No
83437	MedAmerica Ins Co of NY	1186	NY	Yes	No
84450	Aetna Hlth Ins Co of NY	1	NY	Yes	No
85090	Fort Dearborn Life Ins Co of NY	917	NY	Yes	No
85472	National Security Life & Ann Co	704	NY	Yes	No
86375	John Hancock Life Ins Co of NY	904	NY	Yes	No
88625	Fiduciary Ins Co Of Amer		NY	Yes	No
88668	Mutual Of Amer Life Ins Co		NY	Yes	Yes
89006	Protective Life Ins Co of NY	458	NY	Yes	No
89009	Standard Life Ins Co Of NY	1348	NY	Yes	No
92495	First Sunamerica Life Ins Co	12	NY	Yes	No
95023	Aetna Hlth Plans of NY Inc	1	NY	Yes	No
95085	UnitedHealthcare Of NY Inc	707	NY	Yes	No
95234	Aetna Hlth Inc NY Corp	1	NY	Yes	No
95284	Managed Hlth Inc		NY	Yes	No
95305	Health Net Of NY Inc	623	NY	Yes	No
95308	Independent Hlth Assn		NY	Yes	No
95433	Empire Healthchoice HMO Inc	671	NY	Yes	No
95479	Oxford Hlth Plans NY Inc	707	NY	Yes	No
95488	Cigna Hlthcare of NY Inc	901	NY	Yes	No
95491	Capital District Physicians Hlthpln		NY	No	No
95521	MVP Hlth Plan Inc	1198	NY	Yes	No
95534	Wellcare Of NY Inc	1199	NY	Yes	No
95662	Elderplan Inc		NY	No	No
95768	ConnectiCare of NY Inc	1127	NY	Yes	No
95835	GHI Hmo Inc	1304	NY	Yes	No
95854	Horizon Hlthcare of NY Inc	1202	NY	Yes	Yes
96725	Community Hlth Plan	601	NY	Yes	No
-	Senior Network Health		NY	No	No
-	Total Aging in Place Program		NY	No	No
-	Total Senior Care		NY	No	No
-	Elant Choice		NY	Yes	No
-	Elant Choice		NY	Yes	No
-	GuildNet, Inc		NY	Yes	No
-	HomeFirst, Inc		NY	Yes	No
-	Independence Care System		NY	Yes	No
-	Senior Health Partners		NY	Yes	No
102	CLEVELAND AUTOMOBILE DEALERS ASSN GROUP HEALTH		OH	No	No
103	COOPERATIVE GROUP BENEFITS PLAN		OH	No	No
105	GREATER OHIO EMPLOYEE HEALTH AND WELFARE FUND		OH	No	No
107	OHIO FUNERAL DIRECTORS ASSOCIATION BENEFIT TRUST		OH	No	No
108	OHIO GRAPHIC ARTS HEALTH FUND		OH	No	No
109	OHIO BANKERS BENEFITS TRUST		OH	No	No
115	PHA GROUP BENEFIT ASSOCIATION		OH	No	No
10003	EXCESS SHARE INSURANCE CORPORATION	359	OH	Yes	Yes

10060	HARLEYSVILLE INSURANCE COMPANY OF OHIO	253	OH	Yes	Yes
10067	PROGRESSIVE HAWAII INSURANCE CORP	155	OH	Yes	No
10070	NATIONWIDE INDEMNITY COMPANY	140	OH	Yes	Yes
10105	VICTORIA SELECT INSURANCE COMPANY	140	OH	Yes	Yes
10127	ATLANTIC FLORIDIAN INSURANCE COMPANY	140	OH	Yes	Yes
10176	CITIZENS INSURANCE COMPANY OF OHIO	88	OH	Yes	No
10195	INFINITY PREFERRED INSURANCE COMPANY	3495	OH	Yes	No
10202	OHIO MUTUAL INSURANCE COMPANY	963	OH	Yes	Yes
10254	WEST AND KNOX MUTUAL INSURANCE COMPANY		OH	No	No
10255	WASHINGTON MUTUAL INSURANCE ASSOCIATION	4678	OH	Yes	No
10261	WASHINGTON COUNTY FARMERS' MUTUAL INS ASSOCIATI		OH	No	No
10264	NORTON MUTUAL FIRE ASSOCIATION		OH	No	No
10266	PARIS AND WASHINGTON TOWNSHIPS HOME INSURANCE (		OH	No	No
10267	PATRONS BUCKEYE MUTUAL INSURANCE COMPANY		OH	No	No
10268	PIKE MUTUAL INSURANCE COMPANY		OH	No	No
10269	RICHMOND FARMERS MUTUAL INSURANCE COMPANY		OH	No	No
10270	SANDY & BEAVER VALLEY FARMERS MUTUAL INSURANCI		OH	No	No
10271	SONNENBERG MUTUAL INSURANCE COMPANY	207	OH	Yes	No
10272	SPRINGFIELD TOWNSHIP MUTUAL INSURANCE ASSOCIATI(		OH	No	No
10275	UNITED MUTUAL INSURANCE COMPANY OF HANCOCK COI		OH	No	No
10279	MENNONITE MUTUAL AID SOCIETY		OH	No	No
10281	MARION MUTUAL INSURANCE ASSN OF MERCER CTY, OH		OH	No	No
10284	LIME CITY MUTUAL INSURANCE ASSOCIATION		OH	No	No
10300	FARMERS HOME MUTUAL FIRE INSURANCE COMPANY		OH	No	No
10303	FARMERS MUTUAL AID ASSOCIATION		OH	No	No
10304	FARMERS MUTUAL INSURANCE COMPANY		OH	No	No
10305	FARMERS MUTUAL INSURANCE COMPANY OF HARRISON C		OH	No	No
10306	FARMERS MUTUAL RELIEF ASSOCIATION, THE		OH	No	No
10307	GERMAN FARMERS MUTUAL INSURANCE COMPANY		OH	No	No
10309	GERMAN FARMERS MUTUAL OF SARDIS INSURANCE ASSN		OH	No	No
10311	GERMAN MUTUAL INSURANCE COMPANY OF DELPHOS, OH		OH	No	No
10322	GRANGE INDEMNITY INSURANCE COMPANY	267	OH	Yes	Yes
10330	LUCAS COUNTY MUTUAL INSURANCE ASSOCIATION		OH	No	No
10331	EASTERN OHIO MUTUAL FIRE & TORNADO INSURANCE COI		OH	No	No
10334	GERMAN MUTUAL INSURANCE ASSN OF GLANDORF, OH		OH	No	No
10345	COMMUNITY INSURANCE COMPANY	671	OH	Yes	No
10386	AMERICAN FAMILY INSURANCE COMPANY	473	OH	Yes	Yes
10387	AMERICAN STANDARD INSURANCE COMPANY OF O	473	OH	Yes	Yes
10396	PERRY COUNTY MUTUAL FIRE INSURANCE COMPANY		OH	No	No
10397	PUTNAM COUNTY FARMERS MUTUAL INSURANCE COMPAI		OH	No	No
10399	WOODVILLE MUTUAL		OH	No	No
10646	GREAT AMERICAN CONTEMPORARY INSURANCE C(	84	OH	Yes	No
10649	SUMMA INSURANCE COMPANY INC	3259	OH	Yes	No
10677	CINCINNATI INSURANCE COMPANY, THE	244	OH	Yes	No
10767	AMERIGROUP OHIO INC	1156	OH	Yes	No
10777	VICTORIA SPECIALTY INSURANCE COMPANY	140	OH	Yes	Yes
10778	VICTORIA NATIONAL INSURANCE COMPANY	140	OH	Yes	Yes
10948	NATIONWIDE INSURANCE COMPANY OF FLORIDA	140	OH	Yes	Yes
10952	STONEBRIDGE CASUALTY INSURANCE COMPANY	468	OH	Yes	No
10968	INFINITY RESERVE INSURANCE COMPANY	3495	OH	Yes	No
10974	CLUB INSURANCE COMPANY		OH	Yes	No
11017	STATE AUTO INSURANCE COMPANY OF OHIO	175	OH	Yes	Yes
11034	BRISTOL WEST CASUALTY INSURANCE COMPANY	212	OH	Yes	No
11051	NATIONAL INTERSTATE INSURANCE COMPANY OF I	84	OH	Yes	No
11136	GRANGE INSURANCE COMPANY OF MICHIGAN	267	OH	Yes	Yes
11518	PARAMOUNT INSURANCE COMPANY	1212	OH	Yes	No
11738	INFINITY AUTO INSURANCE COMPANY	3495	OH	Yes	No
11770	UNITED FINANCIAL CASUALTY COMPANY	155	OH	Yes	No
11834	BUCKEYE COMMUNITY HEALTH PLAN INC	1295	OH	Yes	No
11841	OHA INSURANCE SOLUTIONS, INC.		OH	Yes	No
11851	PROGRESSIVE ADVANCED INSURANCE COMPANY	155	OH	Yes	No
11967	GENERAL STAR NATIONAL INSURANCE COMPANY	31	OH	Yes	No
11982	GRANGE PROPERTY & CASUALTY INSURANCE COMI	267	OH	Yes	Yes
12203	JAMES RIVER INSURANCE COMPANY	3494	OH	Yes	No
12233	HEALTHCARE UNDERWRITERS GROUP MUTUAL OF OHIO		OH	No	No
12323	UNISON HEALTH PLAN OF OHIO, INC	707	OH	Yes	No
12325	GATEWAY HEALTH PLAN OF OHIO, INC	812	OH	Yes	Yes
12334	MOLINA HEALTHCARE OF OHIO, INC	1531	OH	Yes	No
12353	PARAMOUNT ADVANTAGE	1212	OH	Yes	No
12475	REPUBLIC-FRANKLIN INSURANCE COMPANY	201	OH	Yes	Yes
12489	AMERICAN MODERN SURPLUS LINES INSURANCE C(	361	OH	Yes	No
12700	AMERICAN MUTUAL SHARE INSURANCE CORPORAT	359	OH	Yes	Yes
12747	ENVISION INSURANCE COMPANY		OH	Yes	No
12749	WELLCARE OF OHIO INC	1199	OH	Yes	No
12750	EVERGREEN NATIONAL INDEMNITY COMPANY	3592	OH	Yes	No

12879	PROGRESSIVE COMMERCIAL CASUALTY COMPANY	155	OH	Yes	No
12975	DAVITA VILLAGEHEALTH OF OHIO INC	4422	OH	Yes	No
13072	UNITED OHIO INSURANCE COMPANY	963	OH	Yes	Yes
13123	MOUNT CARMEL HEALTH INSURANCE COMPANY	2838	OH	Yes	No
13331	AMERICAN HARDWARE MUTUAL INSURANCE COMI	291	OH	Yes	Yes
13703	GENERAL AUTOMOBILE INSURANCE COMPANY INC	3638	OH	Yes	No
14060	GRANGE MUTUAL CASUALTY COMPANY	267	OH	Yes	Yes
14621	MOTORISTS MUTUAL INSURANCE COMPANY	291	OH	Yes	Yes
15380	MID-CONTINENT ASSURANCE COMPANY	84	OH	Yes	No
15580	SCOTTSDALE INDEMNITY COMPANY	140	OH	Yes	Yes
16322	PROGRESSIVE DIRECT INSURANCE COMPANY	155	OH	Yes	No
16691	GREAT AMERICAN INSURANCE COMPANY	84	OH	Yes	No
16705	DEALERS ASSURANCE COMPANY		OH	Yes	No
16713	BUCKEYE STATE MUTUAL INSURANCE COMPANY	46	OH	Yes	Yes
16721	CINCINNATI EQUITABLE INSURANCE COMPANY	838	OH	Yes	No
16748	AFFINITY MUTUAL INSURANCE COMPANY		OH	No	No
16764	MIAMI MUTUAL INSURANCE COMPANY	35	OH	Yes	No
16799	WAYNE MUTUAL INSURANCE COMPANY	4678	OH	Yes	No
16802	INFINITY SAFEGUARD INSURANCE COMPANY	3495	OH	Yes	No
17299	MENNONITE MUTUAL INSURANCE COMPANY		OH	No	No
17558	OLD GUARD INSURANCE COMPANY	228	OH	Yes	Yes
17884	GERMAN MUTUAL INSURANCE COMPANY		OH	No	No
18961	CRESTBROOK INSURANCE COMPANY	140	OH	Yes	Yes
19530	STATE AUTO NATIONAL INSURANCE COMPANY	175	OH	Yes	Yes
19658	BRISTOL WEST INSURANCE COMPANY	212	OH	Yes	No
19941	AMERICAN COMMERCE INSURANCE COMPANY	816	OH	Yes	No
19992	AMERICAN SELECT INSURANCE COMPANY	228	OH	Yes	Yes
20176	CELINA MUTUAL INSURANCE COMPANY	35	OH	Yes	No
20184	NATIONAL MUTUAL INSURANCE COMPANY	35	OH	Yes	No
20222	ALL AMERICA INSURANCE COMPANY	36	OH	Yes	Yes
20230	CENTRAL MUTUAL INSURANCE COMPANY	36	OH	Yes	Yes
21735	PROGRESSIVE PREMIER INSURANCE COMPANY OF I	155	OH	Yes	No
21792	INFINITY CASUALTY INSURANCE COMPANY	3495	OH	Yes	No
21857	AMERICAN INSURANCE COMPANY, THE	761	OH	Yes	No
22209	FREEDOM SPECIALTY INSURANCE COMPANY	140	OH	Yes	Yes
22906	PERMANENT GENERAL ASSURANCE CORPORATION	3638	OH	Yes	No
23280	CINCINNATI INDEMNITY COMPANY, THE	244	OH	Yes	No
23418	MID-CONTINENT CASUALTY COMPANY	84	OH	Yes	No
23426	OKLAHOMA SURETY COMPANY	84	OH	Yes	No
23469	AMERICAN MODERN HOME INSURANCE COMPANY	361	OH	Yes	No
23507	MID-AMERICAN FIRE & CASUALTY COMPANY	111	OH	Yes	No
23515	MIDWESTERN INDEMNITY COMPANY (THE)	111	OH	Yes	No
23760	NATIONWIDE GENERAL INSURANCE COMPANY	140	OH	Yes	Yes
23779	NATIONWIDE MUTUAL FIRE INSURANCE COMPANY	140	OH	Yes	Yes
23787	NATIONWIDE MUTUAL INSURANCE COMPANY	140	OH	Yes	Yes
24066	AMERICAN FIRE AND CASUALTY COMPANY	111	OH	Yes	No
24074	OHIO CASUALTY INSURANCE COMPANY	111	OH	Yes	No
24082	OHIO SECURITY INSURANCE COMPANY	111	OH	Yes	No
24104	OHIO FARMERS INSURANCE COMPANY	228	OH	Yes	Yes
24112	WESTFIELD INSURANCE COMPANY	228	OH	Yes	Yes
24120	WESTFIELD NATIONAL INSURANCE COMPANY	228	OH	Yes	Yes
24260	PROGRESSIVE CASUALTY INSURANCE COMPANY	155	OH	Yes	No
24279	PROGRESSIVE MAX INSURANCE COMPANY	155	OH	Yes	No
25135	STATE AUTOMOBILE MUTUAL INSURANCE COMPAN	175	OH	Yes	Yes
25405	SAFE AUTO INSURANCE COMPANY		OH	Yes	No
26093	NATIONWIDE AFFINITY INSURANCE COMPANY OF A	140	OH	Yes	Yes
26123	LIGHTNING ROD MUTUAL INSURANCE COMPANY	207	OH	Yes	No
26131	WESTERN RESERVE MUTUAL CASUALTY COMPANY	207	OH	Yes	No
26344	GREAT AMERICAN ASSURANCE COMPANY	84	OH	Yes	No
26565	OHIO INDEMNITY COMPANY		OH	Yes	No
26794	PLANS LIABILITY INSURANCE COMPANY	23	OH	Yes	No
26832	GREAT AMERICAN ALLIANCE INSURANCE COMPAN	84	OH	Yes	No
27804	PROGRESSIVE WEST INSURANCE COMPANY	155	OH	Yes	No
28665	CINCINNATI CASUALTY COMPANY, THE	244	OH	Yes	No
29076	MEDICAL MUTUAL OF OHIO	730	OH	Yes	Yes
30554	GREAT LAKES PROTECTIVE ASSOCIATION		OH	No	No
31135	GREAT AMERICAN SECURITY INSURANCE COMPAN	84	OH	Yes	No
31925	INFINITY SPECIALTY INSURANCE COMPANY	3495	OH	Yes	No
32620	NATIONAL INTERSTATE INSURANCE COMPANY	84	OH	Yes	No
32700	OWNERS INSURANCE COMPANY	280	OH	Yes	Yes
32786	PROGRESSIVE SPECIALTY INSURANCE COMPANY	155	OH	Yes	No
32999	PHYSICIANS INSURANCE COMPANY OF OHIO		OH	Yes	No
33014	TRANSPORT INSURANCE COMPANY	4234	OH	Yes	No
33723	GREAT AMERICAN SPIRIT INSURANCE COMPANY	84	OH	Yes	No
35190	PROGRESSIVE MOUNTAIN INSURANCE COMPANY	155	OH	Yes	No

35211	INFINITY GENERAL INSURANCE COMPANY	3495	OH	Yes	No
35602	OHIC INSURANCE COMPANY	831	OH	Yes	Yes
36889	FARMERS INSURANCE OF COLUMBUS INC	212	OH	Yes	No
36927	COLONY SPECIALTY INSURANCE COMPANY	457	OH	Yes	No
36951	CENTURY SURETY COMPANY	748	OH	Yes	No
37176	OHIO BAR LIABILITY INSURANCE COMPANY		OH	Yes	No
37834	PROGRESSIVE PREFERRED INSURANCE COMPANY	155	OH	Yes	No
37877	NATIONWIDE PROPERTY & CASUALTY INSURANCE (	140	OH	Yes	Yes
37990	AMERICAN EMPIRE INSURANCE COMPANY	84	OH	Yes	No
38245	BCS INSURANCE COMPANY	23	OH	Yes	No
38580	GREAT AMERICAN PROTECTION INSURANCE COMP/	84	OH	Yes	No
38652	AMERICAN MODERN SELECT INSURANCE COMPANY	361	OH	Yes	No
39497	INFINITY ASSURANCE INSURANCE COMPANY	3495	OH	Yes	No
39640	FIREMAN'S FUND INSURANCE COMPANY OF OHIO	761	OH	Yes	No
39896	GREAT AMERICAN CASUALTY INSURANCE COMPAN	84	OH	Yes	No
40118	TRUSTGARD INSURANCE COMPANY	267	OH	Yes	Yes
40932	MICO INSURANCE COMPANY	291	OH	Yes	Yes
41297	SCOTTSDALE INSURANCE COMPANY	140	OH	Yes	Yes
42412	PROGRESSIVE GULF INSURANCE COMPANY	155	OH	Yes	No
42889	VICTORIA FIRE & CASUALTY COMPANY	140	OH	Yes	Yes
42919	PROGRESSIVE NORTHWESTERN INSURANCE COMPA	155	OH	Yes	No
44180	MOUNTAIN LAUREL ASSURANCE COMPANY	155	OH	Yes	No
44288	PROGRESSIVE CHOICE INSURANCE COMPANY	155	OH	Yes	No
47805	CIGNA DENTAL HEALTH OF OHIO INC	901	OH	Yes	No
50164	BANKERS GUARANTEE TITLE AND TRUST COMPANY, THE		OH	Yes	No
50270	SEAGATE TITLE & ABSTRACT COMPANY INC		OH	No	No
50440	OLYMPIC TITLE INSURANCE COMPANY		OH	No	No
51330	OHIO BAR TITLE INSURANCE COMPANY	70	OH	Yes	No
51632	ENTITLE INSURANCE COMPANY		OH	Yes	No
52022	UDC OHIO INC	19	OH	Yes	No
54380	VISION SERVICE PLAN	1189	OH	Yes	No
54402	DELTA DENTAL PLAN OF OHIO INC	477	OH	Yes	No
56197	ALLIANCE OF TRANSYLVANIAN SAXONS		OH	No	No
56286	AMERICAN MUTUAL LIFE ASSOCIATION		OH	No	No
56316	CATHOLIC LADIES OF COLUMBIA		OH	No	No
56324	CZECH CATHOLIC UNION		OH	No	No
56332	FIRST CATHOLIC SLOVAK LADIES ASSN OF THE USA, THE		OH	No	No
56340	FIRST CATHOLIC SLOVAK UNION OF USA & CANADA		OH	No	No
56359	ORDER SONS OF ITALY IN AMERICA - GRAND LODGE OF OI		OH	No	No
56375	NORTH AMERICAN SWISS ALLIANCE		OH	No	No
56383	ORDER OF UNITED COMMERCIAL TRAVELERS OF AMERICA		OH	No	No
56413	UNITED TRANSPORTATION UNION INSURANCE ASSOCIATI(		OH	No	No
61727	CENTRAL RESERVE LIFE INSURANCE COMPANY	84	OH	Yes	No
62200	GREAT AMERICAN LIFE ASSURANCE COMPANY	84	OH	Yes	No
62375	CONSUMERS LIFE INSURANCE COMPANY	730	OH	Yes	Yes
63312	GREAT AMERICAN LIFE INSURANCE COMPANY	84	OH	Yes	No
63541	SEECHANGE HEALTH INSURANCE COMPANY	759	OH	Yes	No
65269	UNITED BENEFIT LIFE INSURANCE COMPANY	84	OH	Yes	No
65722	LOYAL AMERICAN LIFE INSURANCE COMPANY	84	OH	Yes	No
65811	AMERICAN MODERN LIFE INSURANCE COMPANY	361	OH	Yes	No
66005	OHIO MOTORISTS LIFE INSURANCE COMPANY		OH	Yes	No
66311	MOTORISTS LIFE INSURANCE COMPANY	291	OH	Yes	Yes
66702	NATIONAL MASONIC PROVIDENT ASSOCIATION		OH	No	No
66869	NATIONWIDE LIFE INSURANCE COMPANY	140	OH	Yes	Yes
67172	OHIO NATIONAL LIFE INSURANCE COMPANY, THE	704	OH	Yes	No
67903	PROVIDENT AMERICAN LIFE & HEALTH INSURANCE	84	OH	Yes	No
69647	MOLINA HEALTHCARE INSURANCE COMPANY	1531	OH	Yes	No
70130	UNIVERSAL GUARANTY LIFE INSURANCE COMPANY	4299	OH	Yes	No
70483	WESTERN AND SOUTHERN LIFE INSURANCE COMPA	836	OH	Yes	No
71218	GRANGE LIFE INSURANCE COMPANY	267	OH	Yes	Yes
71404	CONTINENTAL GENERAL INSURANCE COMPANY	84	OH	Yes	No
73518	UNITEDHEALTHCARE INSURANCE COMPANY OF OH	707	OH	Yes	No
74322	MEDICAL BENEFITS MUTUAL LIFE INSURANCE COMPANY		OH	No	No
74780	INTEGRITY LIFE INSURANCE COMPANY	836	OH	Yes	No
76236	CINCINNATI LIFE INSURANCE COMPANY, THE	244	OH	Yes	No
77216	McKINLEY LIFE INSURANCE COMPANY		OH	Yes	No
77968	FAMILY HERITAGE LIFE INSURANCE COMPANY OF AMERIC		OH	Yes	No
84530	US FINANCIAL LIFE INSURANCE COMPANY	968	OH	Yes	No
88064	CINCINNATI EQUITABLE LIFE INSURANCE COMPAN'	838	OH	Yes	No
88366	AMERICAN RETIREMENT LIFE INSURANCE COMPAN	84	OH	Yes	No
89206	OHIO NATIONAL LIFE ASSURANCE CORPORATION	704	OH	Yes	No
91413	WESTERN RESERVE LIFE ASSURANCE COMPANY OF	468	OH	Yes	No
92622	WESTERN-SOUTHERN LIFE ASSURANCE COMPANY	836	OH	Yes	No
92657	NATIONWIDE LIFE AND ANNUITY INSURANCE COMI	140	OH	Yes	Yes
93661	ANNUITY INVESTORS LIFE INSURANCE COMPANY	84	OH	Yes	No

95186	UNITEDHEALTHCARE OF OHIO INC	707	OH	Yes	No
95189	PARAMOUNT CARE INC	1212	OH	Yes	No
95195	HOMETOWN HEALTH PLAN	1297	OH	Yes	Yes
95201	CARESOURCE	3683	OH	Yes	No
95202	SUMMACARE INC	3259	OH	Yes	No
95204	KAISER FOUNDATION HEALTH PLAN OF OHIO	601	OH	Yes	No
95209	CIGNA HEALTHCARE OF OHIO INC	901	OH	Yes	No
95348	HUMANA HEALTH PLAN OF OHIO INC	119	OH	Yes	No
95655	MOUNT CARMEL HEALTH PLAN INC	2838	OH	Yes	No
95828	MEDICAL HEALTH INSURING CORPORATION OF OHI	730	OH	Yes	Yes
96265	DENTAL CARE PLUS INC		OH	Yes	No
96280	SUPERIOR DENTAL CARE INC		OH	Yes	No
99937	COLUMBUS LIFE INSURANCE COMPANY	836	OH	Yes	No
10338	Homeshield Fire & Cas Ins Co	2858	OK	Yes	No
10537	Casualty Corp Of Amer		OK	No	No
10809	Southern Underwriters Ins Co	3489	OK	Yes	No
10810	Republic Fire & Cas Ins Co	3489	OK	Yes	No
10843	FSA Ins Co	194	OK	Yes	No
10882	Top Flight Ins Co		OK	Yes	No
11063	Vehicular Serv Ins Co RRG		OK	No	No
11243	HCC Specialty Ins Co	984	OK	Yes	No
11254	Great Cornerstone Life & Hlth Ins Co		OK	No	No
11262	United Intl Life Ins Co		OK	No	No
11450	American Land & Aircraft Title Co		OK	No	No
11487	Imperial Cas & Ind Co		OK	Yes	No
11691	CommunityCare HMO Inc	3487	OK	Yes	No
11709	GlobalHealth Inc	953	OK	Yes	No
11814	GHS HMO Inc dba BlueLincs HMO	917	OK	Yes	No
11953	Sterling Dental Serv LLC		OK	No	No
12284	SelectCare of Ok Inc	953	OK	Yes	No
13205	Plico Sponsored Captive Ins Co	4661	OK	Yes	Yes
13208	Pre Paid Dental Serv Inc		OK	No	No
13667	HHS Hlth of OK Inc	953	OK	Yes	No
16810	American Mercury Ins Co	660	OK	Yes	No
18538	Bancinsure Inc		OK	Yes	No
19011	Drivers Ins Co	4511	OK	Yes	No
20430	Harbor Ins Co		OK	Yes	No
21334	Empire Ind Ins Co	212	OK	Yes	No
21563	Oklahoma Farm Bureau Mut Ins Co	220	OK	Yes	No
21571	Ag Security Ins Co	220	OK	Yes	No
23663	National Amer Ins Co		OK	No	No
25433	American Safety Ind Co	1346	OK	Yes	No
25704	Pride National Ins Co		OK	Yes	No
26310	Granite Re Inc		OK	No	No
26808	Hallmark Specialty Ins Co	3478	OK	Yes	No
28517	Victore Ins Co		OK	Yes	No
28535	Triangle Ins Co Inc		OK	Yes	No
28681	Union Mut Ins Co		OK	No	No
28711	Park Ave Prop & Cas Ins Co		OK	Yes	No
28738	Farmers Mut Fire Ins Co		OK	No	No
29718	GHS Prop & Cas Ins Co	917	OK	Yes	No
31810	Middle States Ins Co Inc		OK	No	No
32689	Petrosurance Cas Co		OK	Yes	No
33138	Landmark Amer Ins Co	501	OK	Yes	No
34657	Hospital Cas Co		OK	Yes	No
35912	American Western Home Ins Co	361	OK	Yes	No
36188	Compsource OK		OK	No	No
36382	Oklahoma Prop & Cas Ins Co		OK	No	No
36820	Oklahoma Transit Ins Co		OK	Yes	No
36838	Montpelier US Ins Co		OK	Yes	No
37869	Pre Paid Legal Cas Inc		OK	No	No
38474	Pegasus Ins Co		OK	No	No
39411	Oklahoma Attorneys Mut Ins Co		OK	No	No
39594	Physicians Liab Ins Co	4661	OK	Yes	No
39969	American Safety Cas Ins Co	1346	OK	Yes	No
41475	American Farmers & Ranchers Mut Ins	1321	OK	Yes	Yes
47097	Vision Serv Plan Inc OK	1189	OK	Yes	No
50001	American Eagle Title Ins Co		OK	No	No
50037	First Amer Title & Trust Co	70	OK	Yes	No
51365	American Security Title Ins Co		OK	No	No
51411	American Guar Title Ins Co	150	OK	Yes	No
53937	Delta Dental of OK		OK	Yes	No
60004	American Farmers & Ranchers Life Ins	1321	OK	Yes	Yes
60227	Trinity Life Ins Co		OK	Yes	No
60250	AmFirst Ins Co		OK	No	No

60410	American Fidelity Assur Co	330	OK	Yes	No
60801	American Public Life Ins Co	330	OK	Yes	No
61832	Chesapeake Life Ins Co	264	OK	Yes	No
66001	American Benefit Life Ins Co	3436	OK	Yes	No
67326	Old Surety Life Ins Co		OK	No	No
68462	Reserve Natl Ins Co	215	OK	Yes	No
68543	Liberty Bankers Life Ins Co	3436	OK	Yes	No
68691	Security Gen Life Ins Co		OK	Yes	No
70122	Universal Fidelity Life Ins Co		OK	No	No
70548	Wichita Natl Life Ins Co	132	OK	Yes	Yes
72168	Abundant Life Ins Co		OK	Yes	No
73660	Directors Life Assur Co		OK	No	No
74799	Leaders Life Ins Co		OK	No	No
79502	United Funeral Benefit Life Ins Co	1323	OK	Yes	Yes
81884	Equity Life Assn	656	OK	Yes	No
85677	Life Assur Co Inc		OK	No	No
89008	Communitycare Life & Hlth Ins Co	3487	OK	Yes	No
90492	First Dimension Life Ins Co Inc	806	OK	Yes	No
92908	HealthMarkets Ins Co	264	OK	Yes	No
94447	Century Life Ass Co	863	OK	Yes	No
95773	Amcare Hlth Plan Of OK Inc	1307	OK	Yes	No
96903	Pacificare Of OK Inc	707	OK	Yes	No
97055	Mega Life & Hlth Ins Co The	264	OK	Yes	No
97810	American Century Life Ins Co	1340	OK	Yes	No
98868	Sheridan Life Ins Co	132	OK	Yes	Yes
99724	LifeShield Natl Ins Co	2858	OK	Yes	No
10123	Atrio Hlth Plans Inc	12	OR	Yes	No
10698	Valley Prop & Cas Ins Co	215	OR	Yes	No
11071	Safeco Ins Co of OR	111	OR	Yes	No
11161	Preferred Hlth Plan Inc	11	OR	Yes	No
12253	Mid Rogue Hlth Plan		OR	Yes	No
12257	Samaritan Hlth Plans Inc		OR	Yes	No
12277	Health Plan of CareOregon Inc	36	OR	Yes	Yes
12310	Marion Polk Comm Hlth Plan Advantage	3971	OR	Yes	No
12339	Western Grocers Employee Benefit Tru	N/A	OR	No	No
12486	Northwest Physicians Ins Co	831	OR	Yes	Yes
12527	Mid Valley IPA Employee Benefit Trus	37	OR	Yes	No
12559	Trillium Comm Hlth Plan Inc		OR	Yes	No
12595	Clear One Hlth Plans Inc	4132	OR	Yes	Yes
12619	Pioneer Educators Hlth Trust	N/A	OR	No	No
14907	Oregon Mut Ins Co	645	OR	Yes	Yes
18813	Dentists Benefits Ins Co	1313	OR	Yes	No
20338	Northwestern Pacific Ind Co	38	OR	Yes	No
21636	Farmers Ins Co Of OR	212	OR	Yes	No
23892	North Pacific Ins Co	111	OR	Yes	No
23922	Oregon Automobile Ins Co	111	OR	Yes	No
26824	Sublimity Ins Co	2878	OR	Yes	No
30961	Western Protectors Ins Co	645	OR	Yes	Yes
35955	California Cas Gen Ins Co of OR	33	OR	Yes	No
36196	Saif Corp	N/A	OR	No	No
41939	Liberty Northwest Ins Corp	111	OR	Yes	No
47006	Advantage Dental Plan Inc	4	OR	Yes	No
47084	Familycare Hlth Plans Inc	7	OR	Yes	Yes
47098	ODS Hlth Plan Inc	1313	OR	Yes	No
50036	Stewart Title Ins Co Of OR	340	OR	Yes	No
50490	Chicago Title Ins Co Of OR	670	OR	Yes	No
50504	First Amer Title Ins Co of OR	70	OR	Yes	No
52555	Willamette Dental Ins Inc	22	OR	Yes	No
54933	Regence BCBS of OR	1207	OR	Yes	No
54941	Oregon Dental Serv	1313	OR	Yes	No
54976	Pacificsource Hlth Plans	34	OR	Yes	Yes
69019	Standard Ins Co	1348	OR	Yes	No
84930	LifeWise Hlth Plan of OR Inc	962	OR	Yes	No
95005	Providence Hlth Plan	1176	OR	Yes	No
95540	Kaiser Found Hlth Plan of the NW	601	OR	Yes	No
95699	Regence Hmo OR	1207	OR	Yes	No
95800	Health Net Hlth Plan of OR Inc	623	OR	Yes	No
95893	Pacificare Of OR Inc	707	OR	Yes	No
96250	Regence Hlth Maintenance of OR Inc	1207	OR	Yes	No
97985	Regence Life & Hlth Ins Co	1207	OR	Yes	No
10028	Physicians Ins Program Exch		PA	No	No
10030	Ace Ind Ins Co	626	PA	Yes	No
10131	Highmark Senior Resources Inc	812	PA	Yes	Yes
10197	American Integrity Ins Co		PA	No	No
10219	QBE Reins Corp	796	PA	Yes	No

10238	Potomac Ins Co	1129	PA	Yes	No
10244	Geisinger Ind Ins Co	1143	PA	Yes	No
10250	Green Tree Perpetual Assur Co		PA	Yes	No
10480	Capitol Ins Co		PA	Yes	No
10673	Penn Star Ins Co	920	PA	Yes	No
10674	Mainland Ins Co	253	PA	Yes	Yes
10675	AAA Mid Atlantic Ins Co	771	PA	Yes	No
10680	Franklin Homeowners Assur Co	888	PA	Yes	Yes
10724	Eastern Alliance Ins Co	3158	PA	Yes	No
10726	Somerset Cas Ins Co	457	PA	Yes	No
10728	Franklin Ins Co	1114	PA	Yes	No
10745	Homesite Ins Co Of PA	501	PA	Yes	No
10748	Livingston Mut Ins Co	1319	PA	Yes	Yes
10750	1st Choice Auto Ins Co		PA	No	No
10758	Colonial Surety Co		PA	Yes	No
10918	Rayant Ins Co of PA	1202	PA	Yes	Yes
11018	Upmc Hlth Benefits Inc	1324	PA	Yes	No
11061	Farmers Fire Ins Co		PA	No	No
11102	HealthAssurance PA Inc	1137	PA	Yes	No
11219	Lackawanna Amer Ins Co	3118	PA	Yes	No
11242	Allied Eastern Ind Co	3158	PA	Yes	No
11282	Germantown Ins Co	308	PA	Yes	Yes
11460	Homestead Ins Co		PA	Yes	No
11524	Bravo Hlth PA Inc	3387	PA	Yes	No
11530	Healthcare Providers Ins Exch		PA	Yes	No
11675	Professional Cas Assn		PA	Yes	No
11681	Keystone Ins Co	771	PA	Yes	No
11703	Lackawanna Cas Co	3118	PA	Yes	No
11831	Freedom Advantage Ins Co		PA	Yes	No
11863	Positive Physicians Ins Exch		PA	No	No
11932	Mid Continent Ins Co		PA	Yes	No
11968	Pennsylvania Physicians Recip Insur		PA	Yes	No
11981	Westguard Ins Co	828	PA	Yes	No
11994	UPMC Hlth Ntwrk Inc	1324	PA	Yes	No
11995	UPMC For You Inc	1324	PA	Yes	No
12012	Unison Family Hlth Plan of PA Inc	707	PA	Yes	No
12199	Keystone Natl Ins Co	3407	PA	Yes	No
12262	Pennsylvania Manufacturers Assoc Ins	767	PA	Yes	No
12274	Lackawanna Natl Ins Co	3118	PA	Yes	No
12289	Personal Serv Ins Co	3678	PA	Yes	No
12319	Philadelphia Reins Corp	31	PA	Yes	No
12327	Philadelphia United Fire Ins Co	287	PA	Yes	No
12356	School Boards Ins Co of PA Inc		PA	No	No
12358	Avalon Ins Co	1230	PA	Yes	No
12505	Rockwood Ins Co		PA	No	No
12593	Synergy Comp Ins Co		PA	Yes	No
12743	Geisinger Quality Options Inc	1143	PA	Yes	No
12812	Region 6 Rx Corp	936	PA	Yes	No
12921	Shared Serv Ins Grp Inc		PA	Yes	No
13016	HM Cas Ins Co	812	PA	Yes	Yes
13019	Eastern Advantage Assur Co	3158	PA	Yes	No
13045	PennCommonwealth Cas of Amer Corp		PA	No	No
13064	United Natl Ins Co	920	PA	Yes	No
13226	Westmoreland Cas Co		PA	No	No
13285	Allegheny Cas Co		PA	Yes	Yes
13455	Bankers Independent Ins Co	3678	PA	Yes	No
13630	CBHNP Serv Inc	936	PA	Yes	No
13634	Essent Guar Inc	4694	PA	Yes	No
13692	Donegal Mut Ins Co	250	PA	Yes	Yes
13734	Eternal Care Ins Co		PA	No	No
13735	Aetna Better Hlth Inc	1	PA	Yes	No
13748	Essent of PA Inc	4694	PA	Yes	No
14044	Goodville Mut Cas Co		PA	No	No
14168	Harleysville Mut Ins Co	253	PA	Yes	Yes
14370	Lebanon Mut Ins Co		PA	No	No
14400	Lititz Mut Ins Co	1319	PA	Yes	Yes
14478	Mercer Ins Co	1114	PA	Yes	No
14486	Liberty Mut Mid Atlantic Ins Co	111	PA	Yes	No
14575	Millers Capital Ins Co		PA	Yes	No
14664	Mutual Benefit Ins Co	640	PA	Yes	Yes
14702	Eastguard Ins Co	828	PA	Yes	No
14729	Mutual Fire Marine & Inland Ins Co	888	PA	Yes	Yes
14974	Pennsylvania Lumbermens Mut Ins		PA	No	No
14982	Penn Millers Ins Co	125	PA	Yes	No
14990	Pennsylvania Natl Mut Cas Ins Co	271	PA	Yes	Yes

16845	Ashland Mut Fire Ins Co Of PA		PA	No	No
16888	Bedford Grange Mut Ins Co		PA	No	No
16918	Briar Creek Mut Ins Co		PA	No	No
16934	Bucks Cnty Contributionship		PA	No	No
16969	Clearfield Cnty Grange Mut Fire Ins		PA	No	No
16985	Conemaugh Valley Mut Ins Co		PA	No	No
16993	Continental Mut Ins Co	635	PA	Yes	No
17043	Everett Cash Mut Ins Co		PA	No	No
17086	Farmers & Mechanics Mut Ins Co	1319	PA	Yes	Yes
17094	Farmers Mut Fire Ins Co Of Marble		PA	No	No
17108	Farmers Mut Fire Ins Co of McCandles		PA	No	No
17124	Elizabethtown Ins Co	888	PA	Yes	Yes
17132	Highland Mut Ins Co		PA	No	No
17175	Friends Cove Mut Ins Co		PA	No	No
17191	Grange Mut Fire Ins Co		PA	No	No
17213	Ever Greene Mut Ins Co		PA	No	No
17256	HannahsTown Mut Ins Co		PA	No	No
17329	Juniata Mut Ins Co		PA	No	No
17337	Hanover Fire & Cas Ins Co		PA	Yes	No
17450	Millville Mut Ins Co		PA	No	No
17469	Montour Mut Ins Co		PA	No	No
17477	Mutual Fire Ins Co of S Bend Townshi		PA	No	No
17485	Mutual Ins Co Of Lehigh Cnty		PA	No	No
17493	Nazareth Mut Ins Co		PA	No	No
17531	Old Elizabeth Mut Fire Ins Co		PA	No	No
17582	Patrons Mut Fire Ins Co of IN PA		PA	No	No
17620	Penn Charter Mut Ins Co	1319	PA	Yes	Yes
17701	Pymatuning Mut Fire Ins Co		PA	No	No
17728	Reamstown Mut Ins Co		PA	No	No
17736	Saucon Mut Ins Co		PA	No	No
17744	Seaway Mut Ins Co		PA	No	No
17752	Select Risk Ins Co	640	PA	Yes	Yes
17825	Tuscarora Wayne Ins Co	3407	PA	Yes	No
17868	Wall Rose Mut Ins Co		PA	No	No
17876	Washington Mut Fire Of Lawrence Cty		PA	No	No
17892	West Branch Mut Ins Co		PA	No	No
17906	White Hall Mut Ins Co		PA	No	No
17914	Philadelphia Contributionship Ins	308	PA	Yes	Yes
17930	Philadelphia Contributionship for In	308	PA	Yes	Yes
17957	American Independent Ins Co	3678	PA	Yes	No
17965	American Sentinel Ins Co	313	PA	Yes	No
17990	Tri Century Ins Co	1324	PA	Yes	No
18007	Cloister Mut Cas Ins Co		PA	No	No
18058	Philadelphia Ind Ins Co	677	PA	Yes	No
18104	Anthracite Mut Fire Ins Co		PA	Yes	Yes
18279	Bankers Standard Ins Co	626	PA	Yes	No
19402	Chartis Prop Cas Co	12	PA	Yes	No
19429	Insurance Co Of The State Of PA	12	PA	Yes	No
19445	National Union Fire Ins Co Of Pitts	12	PA	Yes	No
19577	Villanova Ins Co	1172	PA	Yes	No
20427	American Cas Co Of Reading PA	218	PA	Yes	No
20508	Valley Forge Ins Co	218	PA	Yes	No
20591	Bankers Standard Fire & Marine Co	626	PA	Yes	No
20699	Ace Prop & Cas Ins Co	626	PA	Yes	No
20702	Ace Fire Underwriters Ins Co	626	PA	Yes	No
20710	Century Ind Co	626	PA	Yes	No
20720	Radian Ins Inc	766	PA	Yes	No
20796	21st Century Premier Ins Co	212	PA	Yes	No
21962	Pennsylvania Gen Ins Co	1129	PA	Yes	No
21970	OneBeacon Ins Co	1129	PA	Yes	No
22225	21st Century Preferred Ins Co	212	PA	Yes	No
22586	Atlantic States Ins Co	250	PA	Yes	Yes
22667	Ace Amer Ins Co	626	PA	Yes	No
22705	R&Q Reins Co	4234	PA	Yes	No
22713	Insurance Co of N Amer	626	PA	Yes	No
22748	Pacific Employers Ins Co	626	PA	Yes	No
23477	American Millers Ins Co	125	PA	Yes	No
23582	Harleysville Ins Co	253	PA	Yes	Yes
23809	Granite State Ins Co	12	PA	Yes	No
23833	21st Century Security Ins Co	212	PA	Yes	No
23841	New Hampshire Ins Co	12	PA	Yes	No
23850	Philadelphia Ins Co	677	PA	Yes	No
24147	Old Republic Ins Co	150	PA	Yes	No
24422	Legion Ins Co	1172	PA	Yes	No
24457	Reliance Ins Co		PA	Yes	No

25895	United States Liab Ins Co	31	PA	Yes	No
26166	Windsor Mount Joy Mut Ins Co		PA	No	No
26182	Harleysville Worcester Ins Co	253	PA	Yes	Yes
26263	Erie Ins Co	213	PA	Yes	No
26271	Erie Ins Exch	213	PA	Yes	No
26522	Mount Vernon Fire Ins Co	31	PA	Yes	No
26830	Erie Ins Prop & Cas Co	213	PA	Yes	No
27197	Apollo Mut Fire Ins Co		PA	No	No
27200	Cambria Cnty Mut Ins Co		PA	No	No
27219	Center Valley Mut Fire Ins Co		PA	No	No
27278	Protection Mut Ins Co		PA	No	No
27332	Canonsburg Mut Fire Ins Co		PA	No	No
27340	Centre Cnty Mut Fire Ins Co		PA	No	No
27405	Locust Mut Fire Ins Co		PA	No	No
27529	Laundry Owners Mut Liab Ins Assn		PA	No	No
27650	Shamokin Township Mut Fire Ins Co		PA	No	No
27677	State Workers Ins Fund		PA	No	No
27685	Stone Valley Mut Fire Ins Co		PA	No	No
28231	Fidelio Ins Co		PA	Yes	No
28519	First Sealord Surety Inc		PA	Yes	No
28550	Housing & Redevelopment Ins Exch		PA	Yes	No
28649	Eastern Atlantic Ins Co	1226	PA	Yes	No
30864	Insurance Placement Facility Of PA		PA	No	No
30880	Washington Fire & Storm Ins	3407	PA	Yes	No
31470	Norguard Ins Co	828	PA	Yes	No
32441	Penn Nail Security Ins Co	271	PA	Yes	Yes
32859	Penn Amer Ins Co	920	PA	Yes	No
33537	Pennsylvania Professional Liab JUA		PA	No	No
33790	Radian Guar Inc	766	PA	Yes	No
33855	Lincoln Gen Ins Co	1326	PA	Yes	No
33898	Aegis Security Ins Co	313	PA	Yes	No
34169	Commonwealth Ins Co		PA	Yes	No
34541	Allegheny Surety Co		PA	Yes	No
34789	21st Century Centennial Ins Co	212	PA	Yes	No
35114	PMSLIC Ins Co	1282	PA	Yes	Yes
35289	Continental Ins Co	218	PA	Yes	No
35483	Daily Underwriters Of Amer		PA	No	No
35505	Rockwood Cas Ins Co	457	PA	Yes	No
35585	Flagship City Ins Co	213	PA	Yes	No
35599	Highmark Cas Ins Co	812	PA	Yes	Yes
35696	Harleysville Preferred Ins Co	253	PA	Yes	Yes
35963	AF&L Ins Co	1289	PA	Yes	No
36897	Manufacturers Alliance Ins Co	767	PA	Yes	No
37052	Regis Ins Co		PA	Yes	No
37257	Praetorian Ins Co	796	PA	Yes	No
38679	Pennsylvania Surface Coal Min Ins		PA	Yes	No
39217	QBE Ins Corp	796	PA	Yes	No
39675	Excalibur Reins Corp		PA	Yes	No
40258	Chartis Cas Co	12	PA	Yes	No
40983	Harleysville Pennland Ins Co	253	PA	Yes	Yes
41106	Triumphe Cas Co	84	PA	Yes	No
41203	Capital Advantage Ins Co	1230	PA	Yes	No
41424	Pennsylvania Manufacturers Ind Co	767	PA	Yes	No
42129	United Security Assur Co Of PA	1223	PA	Yes	No
42390	Amguard Ins Co	828	PA	Yes	No
43575	Indemnity Ins Co Of North Amer	626	PA	Yes	No
43958	Commerce Protective Ins Co		PA	Yes	No
43974	21st Century Ind Ins Co	212	PA	Yes	No
47019	Magellan Behavioral Hlth of PA Inc	1260	PA	Yes	No
47022	Physicians Care Ppo Inc		PA	No	No
47024	Community Care Behavioral Hlth Org	1324	PA	Yes	No
47025	Value Behavioral Hlth of PA Inc	965	PA	Yes	No
47041	Cigna Dental Hlth of PA Inc	901	PA	Yes	No
47089	United Concordia Dental Plan PA Inc	812	PA	Yes	Yes
51209	Conestoga Title Ins Co	250	PA	Yes	Yes
51446	Manito Title Ins Co		PA	Yes	No
53252	Inter Cnty Hlth Plan Inc	936	PA	Yes	No
53953	Vision Benefits of Amer Inc	4696	PA	Yes	No
54704	Independence Blue Cross	936	PA	Yes	No
54720	Capital Blue Cross	1230	PA	Yes	No
54747	Hospital Serv Assn of NE PA	1270	PA	Yes	Yes
54763	Inter Cty Hospitalization Plan Inc	936	PA	Yes	No
54771	Highmark Inc	812	PA	Yes	Yes
54798	Delta Dental of PA	2479	PA	Yes	No
56634	Croatian Fraternal Union Of Amer		PA	No	No

56642	First Windish Frat Benefit Society		PA	No	No
56650	Grand Council Pa Catholic Beneficial		PA	No	No
56677	Grand Lodge of PA Order Sons of Ital		PA	No	No
56685	Greater Beneficial Union Pittsburgh		PA	No	No
56693	Greek Catholic Union Of The USA		PA	No	No
56707	ISDA fraternal Assoc		PA	No	No
56715	Ladies Pa Slovak Catholic Union		PA	No	No
56758	Loyal Christian Benefit Assn		PA	No	No
56766	Most Exc Assn Of Artisans Order		PA	No	No
56774	National Council Junior Order United		PA	No	No
56782	National Slovak Society Of The Usa		PA	No	No
56812	Polish Beneficial Assn		PA	No	No
56820	Polish Falcons Of Amer		PA	No	No
56839	Polish Natl Union Of Amer		PA	No	No
56847	Polish Union Of Us Of N Amer		PA	No	No
56863	Providence Assn Ukranian Catholics		PA	No	No
56871	Russian Brotherhood Org USA		PA	No	No
56936	Serb Natl Federation		PA	No	No
57010	William Penn Assn		PA	No	No
57673	Slovene Natl Benefit Society		PA	No	No
58262	Lithuanian Alliance Of Amer		PA	No	No
60147	First Priority Life Ins Co Inc	1270	PA	Yes	Yes
60232	AGL Life Assur Co	403	PA	Yes	No
62065	Colonial Penn Life Ins Co	233	PA	Yes	No
62294	United Concordia Life & Hlth Ins Co	812	PA	Yes	Yes
62804	Eastern Life & Hlth Ins Co	3158	PA	Yes	No
63282	Penn Treaty Ntwrk Amer Ins Co	810	PA	Yes	No
63762	Medco Containment Life Ins Co	433	PA	Yes	No
63819	Unity Financial Life Ins Co	786	PA	Yes	Yes
64327	Harleysville Life Ins Co	253	PA	Yes	Yes
65374	Life Assur Co Of PA		PA	No	No
65498	Life Ins Co Of N Amer	901	PA	Yes	No
67636	Significa Ins Grp Inc	1270	PA	Yes	Yes
67644	Penn Mut Life Ins Co	850	PA	Yes	Yes
67660	Pennsylvania Life Ins Co	953	PA	Yes	No
67792	Philadelphia-United Life Ins Co	287	PA	Yes	No
69221	National Amer Life Ins Co of PA		PA	No	No
69353	Teachers Protective Mut Life Ins Co		PA	No	No
69515	Medamerica Ins Co	1186	PA	Yes	No
70769	Erie Family Life Ins Co	213	PA	Yes	No
71768	HM Hlth Ins Co	812	PA	Yes	Yes
72052	Aetna Hlth Ins Co	1	PA	Yes	No
73326	Colonial Amer Life Ins Co	1223	PA	Yes	No
73539	Continental Life Ins Co	635	PA	Yes	No
74705	Corporate Life Ins Co		PA	No	No
75744	National Safety Life Ins Co	535	PA	Yes	Yes
76325	Senior Hlth Ins Co of PA		PA	Yes	No
76694	London Life Reins Co	769	PA	Yes	No
76759	Senior Amer Life Ins Co	1289	PA	Yes	No
77887	Life & Hlth Ins Co of Amer		PA	No	No
81078	American Ntwrk Ins Co	810	PA	Yes	No
89070	United Concordia Companies Inc	812	PA	Yes	Yes
93440	HM Life Ins Co	812	PA	Yes	Yes
93688	QCC Ins Co	936	PA	Yes	No
95033	Americhoice Of PA Inc	707	PA	Yes	No
95044	Amerihealth Hmo Inc	936	PA	Yes	No
95048	Keystone Hlth Plan W Inc	812	PA	Yes	Yes
95056	Keystone Hlth Plan E Inc	936	PA	Yes	No
95060	Health Amer PA Inc	1137	PA	Yes	No
95066	Health Partners Of Philadelphia Inc		PA	Yes	No
95109	Aetna Hlth Inc PA Corp	1	PA	Yes	No
95121	Cigna Hlthcare of PA Inc	901	PA	Yes	No
95199	Keystone Hlth Plan Central Inc	1230	PA	Yes	No
95216	UPMC Hlth Plan Inc	1324	PA	Yes	No
95220	Unison Hlth Plan of PA Inc	707	PA	Yes	No
95231	Philcare Hlth Systems Inc		PA	No	No
95283	Coventry Hlth Care of PA Inc	1137	PA	Yes	No
95356	HRM Hlth Plans PA Inc		PA	No	No
95923	Geisinger Hlth Plan	1143	PA	Yes	No
96601	Hmo Of NE PA	1270	PA	Yes	Yes
96660	Vista Hlth Plan Inc	936	PA	Yes	No
96938	Gateway Hlth Plan Inc	812	PA	Yes	Yes
10014	Affiliated Fm Ins Co	65	RI	Yes	Yes
10316	Appalachian Ins Co	65	RI	Yes	Yes
11837	Castle Hill Ins Co	3490	RI	Yes	Yes

12287	Amica Prop & Cas Ins Co	28	RI	Yes	Yes
12487	AAA Southern New England Ins Co		RI	No	No
13101	Medical Malpractice Joint Underwriti		RI	No	No
14931	Pawtucket Ins Co	497	RI	Yes	No
15040	Providence Mut Fire Ins Co	382	RI	Yes	Yes
19976	Amica Mut Ins Co	28	RI	Yes	Yes
21482	Factory Mut Ins Co	65	RI	Yes	Yes
22276	Stonewall Ins Co	1343	RI	Yes	No
24017	Beacon Mut Ins Co	3490	RI	Yes	Yes
24295	Providence Washington Ins Co	156	RI	Yes	No
24325	York Ins Co	156	RI	Yes	No
25321	Metropolitan Drt Prop & Cas Ins Co	241	RI	Yes	No
25763	Seaton Ins Co	1343	RI	Yes	No
26298	Metropolitan Prop & Cas Ins Co	241	RI	Yes	No
31909	American Concept Ins Co	156	RI	Yes	No
33430	Providence Plantations Ins Co	382	RI	Yes	Yes
34339	Metropolitan Grp Prop & Cas Ins Co	241	RI	Yes	No
34711	Computer Ins Co		RI	Yes	No
39950	Metropolitan Gen Ins Co	241	RI	Yes	No
40169	Metropolitan Cas Ins Co	241	RI	Yes	No
43001	Narragansett Bay Ins Co	497	RI	Yes	No
45055	Coventry Ins Co		RI	No	No
47902	Prepaid Legal Serv Corp of RI		RI	No	No
52632	Altus Dental Ins Co Inc	1571	RI	Yes	Yes
53473	BCBS of RI		RI	No	No
55301	Delta Dental of RI	1571	RI	Yes	Yes
64602	Independence Life & Ann Co	549	RI	Yes	No
72222	Amica Life Ins Co	28	RI	Yes	Yes
87564	Northern Natl Life Ins Co of RI		RI	Yes	No
95149	UnitedHealthcare of New England Inc	707	RI	Yes	No
95402	Neighborhood Hlth Plan of RI Inc		RI	No	No
10464	Canal Ins Co	262	SC	Yes	Yes
10702	Madison Ins Co	4680	SC	Yes	No
10752	Novus Ins Co RRG		SC	No	No
10773	ALIC Reins Co	8	SC	Yes	No
10794	Companion Commercial Ins Co	661	SC	Yes	Yes
11066	MSA Ins Co	311	SC	Yes	No
11097	Heritage Warranty Ins RRG Inc		SC	Yes	No
11114	St Charles Ins Co RRG		SC	Yes	No
11117	Marathon Fin Ins Co Inc RRG		SC	Yes	No
11128	Greenville Cas Ins Co Inc		SC	No	No
11153	Titan Ins Co Inc RRG		SC	No	No
11194	Capital Assur RRG Inc		SC	Yes	No
11197	National Independent Truckers IC RRG		SC	No	No
11513	Physicians Specialty Ltd RRG		SC	No	No
11544	Caregivers United Liab Ins Co RRG		SC	No	No
11558	AssuranceAmerica Ins Co		SC	No	No
11573	Accident Ins Co Inc	4680	SC	Yes	No
11581	Graco RRG Inc		SC	No	No
11589	Jamestown Ins Co RRG		SC	No	No
11590	American Forest Cas Co RRG		SC	Yes	No
11669	Superior Ins Co RRG		SC	No	No
11683	Healthcare Providers Ins Co RRG		SC	Yes	No
11684	LVHN RRG		SC	Yes	No
11694	Central PA Physicians RRG Inc		SC	No	No
11698	Faith Affiliated RRG Inc		SC	Yes	No
11712	Saint Lukes Hlth System RRG		SC	Yes	No
11775	Unison Hlth Plan of SC Inc	707	SC	Yes	No
11798	Continuing Care RRG Inc		SC	No	No
11801	First Keystone RRG Inc		SC	No	No
11807	Communities of Faith RRG		SC	No	No
11970	Gulf Builders RRG Inc		SC	No	No
11979	Transportation Liab Ins Co RRG		SC	Yes	No
11985	Companion Captive Ins Co	661	SC	Yes	Yes
11990	Essential RRG Inc		SC	No	No
11992	Clarian Hlth RRG Inc	4637	SC	Yes	No
12004	Phoebe Recip RRG		SC	No	No
12013	Allied Serv RRG		SC	Yes	No
12014	Guthrie RRG		SC	Yes	No
12015	Emergency Medicine RRG Inc		SC	Yes	No
12019	Republic RRG		SC	Yes	No
12157	Companion Prop & Cas Ins Co	661	SC	Yes	Yes
12158	New Castle Recip RRG		SC	No	No
12168	Instil Hlth Ins Co	661	SC	Yes	Yes
12189	Oceanus Ins Co A RRG		SC	Yes	No

12224	Asset Protection Program RRG Inc		SC	No	No
12226	Northeast Physicians RRG Inc		SC	No	No
12232	Metlife Reins Co of SC	241	SC	Yes	No
12266	Orkney Re Inc	3506	SC	Yes	No
12485	SFG Reins Co	431	SC	Yes	No
12492	Tower Captive Ins Co	458	SC	Yes	No
12507	Physicians Proactive Protection Inc		SC	Yes	No
12510	Great W Life & Ann Ins Co of SC	769	SC	Yes	No
12511	Samaritan RRG Inc		SC	No	No
12512	Good Shepherd Recip RRG Inc		SC	No	No
12529	National Medical Professional RRG In		SC	No	No
12532	New Star RRG Inc		SC	No	No
12596	Timberlake Reins Co II	4639	SC	Yes	No
12604	Wellpath of SC Inc	1137	SC	Yes	No
12753	Hilton Head Prop & Cas Inc		SC	No	No
12757	LFG SC Reins Co	20	SC	Yes	No
12765	AMERIGROUP Comm Care of SC Inc	1156	SC	Yes	No
12822	Charleston Capital Reins LLC	3891	SC	Yes	No
12835	Tailwind Reins Co	565	SC	Yes	No
12888	Leschi Life Assur Co	212	SC	Yes	No
12907	Southwest Physicians RRG Inc		SC	Yes	No
12910	Americas 1st Choice Hlth Plans Inc		SC	No	No
12911	Carolina Crescent Hlth Plan Inc		SC	Yes	No
12959	Absolute Total Care Inc	1295	SC	Yes	No
12983	Whisperingwind I LLC	229	SC	Yes	No
12984	Whisperingwind III LLC	229	SC	Yes	No
12997	Physicians Re Captive Ins Co		SC	No	No
13028	Lincoln Reins Co of SC	20	SC	Yes	No
13047	Guardian Hlthcare Inc		SC	No	No
13074	Whisperingwind II LLC		SC	Yes	No
13078	Red Clay RRG Inc		SC	No	No
13121	Palmetto Surety Corp		SC	Yes	No
13135	Suburban Hlth Org RRG LLC		SC	Yes	No
13181	Wachovia Re Inc		SC	Yes	No
13193	Lincoln Reins Co of SC II	20	SC	Yes	No
13215	River Lake Ins Co	4011	SC	Yes	No
13216	River Lake Ins Co II	4011	SC	Yes	No
13217	River Lake Ins Co III	4011	SC	Yes	No
13219	Rivermont Life Ins Co I	4011	SC	Yes	No
13626	Metlife Reins Co of Charleston	241	SC	Yes	No
13664	LBL Re Inc		SC	No	No
15164	South Carolina Farm Bur Mut Ins Co	533	SC	Yes	No
16632	Vinings Ins Co	1302	SC	Yes	Yes
18406	Spartan Prop Ins Co		SC	Yes	No
24937	Catawba Ins Co	168	SC	Yes	No
24945	Consolidated Amer Ins Co	168	SC	Yes	No
24953	South Carolina Ins Co	168	SC	Yes	No
26468	Southern Mut Church Ins Co		SC	No	No
27790	Canal Ind Co	262	SC	Yes	Yes
30007	General Fidelity Ins Co	1281	SC	Yes	No
30589	Capital City Ins Co Inc	796	SC	Yes	No
34134	South Carolina Wind & Hail Underwrit		SC	No	No
38520	BCBS Of SC Inc	661	SC	Yes	Yes
42393	Palmetto Cas Ins Co	533	SC	Yes	No
50377	National Investors Title Ins Co	627	SC	Yes	No
51152	TransUnion Natl Title Ins Co	3889	SC	Yes	No
60141	Pacific Captive Ins Co	458	SC	Yes	No
60234	Golden Gate Captive Ins Co	458	SC	Yes	No
61115	Atlantic Coast Life Ins Co		SC	No	No
61492	Liberty Life Ins Co		SC	Yes	No
62049	Colonial Life & Accident Ins Co	565	SC	Yes	No
65110	Kanawha Ins Co	119	SC	Yes	No
65480	Old Spartan Life Ins Co Inc		SC	Yes	No
71730	Continental Amer Ins Co		SC	Yes	No
77828	Companion Life Ins Co	661	SC	Yes	Yes
92053	Wateree Life Ins		SC	Yes	No
93521	General Fidelity Life Ins Co	1281	SC	Yes	No
95458	Select Hlth of SC Inc		SC	Yes	No
95708	Cigna Hlthcare of SC Inc	901	SC	Yes	No
95732	Carolina Care Plan Inc	730	SC	Yes	Yes
95741	BlueChoice Hlthplan of SC Inc	661	SC	Yes	Yes
97705	Direct Gen Life Ins Co	1213	SC	Yes	No
10909	Sun Surety Ins Co		SD	No	No
11203	Avera Prop Ins Inc		SD	Yes	No
11443	Northern Plains Ins Co		SD	No	No

11708	HICA Education Loan Corp		SD	Yes	No
12535	Reliamax Ins Co	4152	SD	Yes	No
12623	Reliamax Surety Co	4152	SD	Yes	No
12786	Bohemian Farmers Mut Ins Co		SD	No	No
12787	Central Farm Mut Ins Co		SD	No	No
12788	Clark Farm Mut Ins Co		SD	No	No
12789	Dakota Farm Mut Ins Co		SD	No	No
12790	Farm Mut Ins Co of Clay Cnty SD		SD	No	No
12791	Farm Mut Ins Co of Lincoln Cnty SD		SD	No	No
12792	Farm Mut Ins Co of Minnehaha Cnty		SD	No	No
12794	German Mut Farmers Ins Co of Bon Hom		SD	No	No
12795	Hanson Farm Mut Ins Co of SD		SD	No	No
12796	Harding & Perkins Farm Mut Ins Co		SD	No	No
12797	Humboldt Farm Mut Ins Co of SD		SD	No	No
12798	McCook Farm Mut Ins Co of SD		SD	No	No
12799	Opdahl Farm Mut Ins Co		SD	No	No
12800	Roberts Cnty Farm Mut Ins Co		SD	No	No
12801	Scandinavian Farm Mut Ins Co of Mars		SD	No	No
12802	Turner Farm Mut Ins Co of SD		SD	No	No
12803	Union Farm Mut Ins Co Inc		SD	No	No
13188	Western Surety Co	218	SD	Yes	No
13200	Universal Surety Of Amer	218	SD	Yes	No
13561	Great Plains Life Assur Co		SD	Yes	No
14885	Northwest Gf Mut Ins Co		SD	No	No
24047	Surety Bonding Co Of Amer	218	SD	Yes	No
27766	Missouri Valley Mut Ins Co		SD	No	No
30279	Vantol Surety Co Inc		SD	No	No
30309	Watertown Mut Plate Glass Ins Co		SD	No	No
31445	De Smet Farm Mut Ins Co Of SD	205	SD	Yes	Yes
34924	Dakota Truck Underwriters	1124	SD	Yes	Yes
38539	De Smet Ins Co Of SD	205	SD	Yes	Yes
41653	Milbank Ins Co	175	SD	Yes	Yes
50020	Dakota Homestead Title Ins Co		SD	Yes	No
54097	Delta Dental Plan of SD		SD	No	No
60128	Wellmark Of SD Inc	770	SD	Yes	Yes
67989	American Memorial Life Ins Co	19	SD	Yes	No
95683	Sanford Hlth Plan	1246	SD	Yes	No
95839	Avera Hlth Plans Inc		SD	Yes	No
96598	South Dakota State Med Holding Co		SD	No	No
10156	Sheffield Ins Co		TN	Yes	No
10204	Consumers Ins Usa Inc		TN	Yes	No
10223	Preferred Auto Ins Co Inc		TN	No	No
10800	Premier Grp Ins Co Inc		TN	Yes	No
10817	Plateau Cas Ins Co	629	TN	Yes	No
11139	Unison Hlth Plan of TN Inc	707	TN	Yes	No
11147	United Hlthcare of TN Inc	707	TN	Yes	No
11522	Healthspring of TN Inc	3477	TN	Yes	No
12321	American Continental Ins Co	4011	TN	Yes	No
12575	SilverScript Ins Co	4667	TN	Yes	No
12825	First Acceptance Ins Co of TN Inc	3362	TN	Yes	No
12839	Road Contractors Mut Ins Co		TN	No	No
12858	Tennessee Ins Co		TN	Yes	No
12941	AMERIGROUP TN Inc	1156	TN	Yes	No
13651	East TN Mut Ins Co		TN	No	No
13707	Hamilton Ins Co LLC		TN	Yes	No
14320	Distributors Ins Co		TN	Yes	No
15245	Tennessee Farmers Mut Ins Co	694	TN	Yes	No
20141	National Trust Ins Co	474	TN	Yes	No
30651	Farmers Mut Of TN		TN	No	No
31208	American Gen Prop Ins Co	12	TN	Yes	No
31280	North Amer Ind Co		TN	Yes	No
31550	Haulers Ins Co Inc	123	TN	Yes	Yes
33049	State Volunteer Mut Ins Co		TN	No	No
33359	Professional Liab Ins Co	1299	TN	Yes	No
37220	Direct Ins Co	1213	TN	Yes	No
37648	Permanent Gen Assur Corp	3638	TN	Yes	No
37788	Hospital Underwriting Grp Inc	1299	TN	Yes	No
41220	Tennessee Farmers Assur Co	694	TN	Yes	No
44130	Paratransit RRG Grp Ins Co		TN	No	No
50261	Title Guar & Trust Co		TN	No	No
54518	BCBS of TN Inc	3498	TN	Yes	No
54526	Delta Dental Plan of TN	477	TN	Yes	No
56456	United States Letter Carriers Mut Be		TN	No	No
60149	Overton Life Ins Co		TN	Yes	No
60210	Sequatchie Life Ins Co		TN	Yes	No

65463	Golden Security Ins Co	3498	TN	Yes	No
66672	American Gen Life & Acc Ins Co	12	TN	Yes	No
67725	Continental Bankers Life Ins Co S		TN	No	No
68136	Protective Life Ins Co	458	TN	Yes	No
68195	Provident Life & Accident Ins Co	565	TN	Yes	No
68209	Provident Life & Cas Ins Co	565	TN	Yes	No
68489	Franklin Amer Life Ins Co	658	TN	Yes	No
68500	Continental Life Ins Co Brentwood	4011	TN	Yes	No
80020	Mountain Life Ins Co		TN	Yes	No
82740	Cariten Ins Co	119	TN	Yes	No
82759	Tennessee Farmers Life Ins Co	694	TN	Yes	No
84280	Insouth Life Ins Co		TN	Yes	No
84379	First Citizens Life Ins Co		TN	Yes	No
84468	MCB Life Ins Co	458	TN	Yes	No
86789	Scenic City Life Ins Co		TN	Yes	No
87424	Ocoee Life Ins Co		TN	Yes	No
88749	Middle TN Life Ins Co		TN	Yes	No
89005	TRH Hlth Ins Co	4677	TN	Yes	No
89605	First Comm Life Ins Co		TN	Yes	No
90107	Ridgeway Life Ins Co		TN	Yes	No
95606	Cigna Hlthcare of TN Inc	901	TN	Yes	No
95749	Preferred Hlth Partnership of TN Inc	119	TN	Yes	No
95754	Cariten Hlth Plan Inc	119	TN	Yes	No
95780	Tennessee Behavioral Hlth Inc		TN	Yes	No
95791	Health 123 Inc	1268	TN	Yes	No
95792	Windsor Hlth Plan Inc	1268	TN	Yes	No
97152	Plateau Ins Co	629	TN	Yes	No
10024	Independence Cas & Surety Co	922	TX	Yes	No
10043	American Natl Lloyds Ins Co	408	TX	Yes	Yes
10076	Unicare Hlth Ins Co of Tx	671	TX	Yes	No
10078	USAA Cnty Mut Ins Co	200	TX	Yes	Yes
10085	Tank Owner Members Ins Co		TX	Yes	No
10096	Selectcare of TX LLC	953	TX	Yes	No
10134	Bravo Hlth Texas Inc	3387	TX	Yes	No
10157	Vision Ins Co	3702	TX	Yes	No
10199	Ranchers & Farmers Mut Ins Co	3497	TX	Yes	No
10245	21st Century Ins Co Of the SW	212	TX	Yes	No
10336	First Acceptance Ins Co Inc	3362	TX	Yes	No
10340	Stonington Ins Co	1331	TX	Yes	No
10393	Texas Medical Ins Co		TX	Yes	No
10590	Heartland Lloyds Ins Co	681	TX	Yes	No
10600	Employers Of TX Lloyds	61	TX	Yes	No
10685	Citadel Ins Co	31	TX	Yes	No
10757	Molina Hlthcare of TX Inc	1531	TX	Yes	No
10759	Universal N Amer Ins Co	71	TX	Yes	No
10768	Selectcare Hlth Plans Inc	953	TX	Yes	No
10807	ACCC Ins Co		TX	Yes	No
10818	Facility Ins Corp	181	TX	Yes	No
10896	Amica Lloyds Of TX	28	TX	Yes	No
10906	Commercial Alliance Ins Co		TX	Yes	No
10916	Suretec Ins Co		TX	Yes	No
10925	Southern Vanguard Ins Co	3489	TX	Yes	No
10990	Utica Lloyds Of TX	201	TX	Yes	Yes
10996	Horace Mann Lloyds	300	TX	Yes	No
11008	Auto Club Ind Co	1318	TX	Yes	Yes
11009	Auto Club Cas Co	1318	TX	Yes	Yes
11041	Liberty Lloyds Of TX Ins Co	111	TX	Yes	No
11047	New Century Ins Co	1342	TX	Yes	Yes
11059	ASI Lloyds	1344	TX	Yes	No
11070	Safeco Lloyds Ins Co	111	TX	Yes	No
11090	Worth Cas Co	2438	TX	Yes	Yes
11120	USAA TX Lloyds Co	200	TX	Yes	Yes
11121	Unified Life Ins Co		TX	No	No
11134	Fidelity First Ins Co	264	TX	Yes	No
11141	Evercare of TX LLC	707	TX	Yes	No
11143	Community First Grp Hospital Serv Co	2738	TX	Yes	Yes
11168	Pacific Specialty Prop & Cas Co	2898	TX	Yes	No
11198	Loya Ins Co	3702	TX	Yes	No
11237	Homesite Lloyds of Tx	501	TX	Yes	No
11284	Beacon Lloyds Ins Co	175	TX	Yes	Yes
11494	Physicians Hlth Choice of TX LLC	4423	TX	Yes	No
11496	Insurors Ind Lloyds	3279	TX	Yes	No
11497	Stonington Lloyds Ins Co	1331	TX	Yes	No
11521	Germania Select Ins Co	171	TX	Yes	Yes
11523	Fidelity Natl Ind Ins Co	670	TX	Yes	No

11526	America First Lloyds Ins Co	111	TX	Yes	No
11543	Texas Fair Plan Assn		TX	No	No
11578	Cypress TX Lloyds	3456	TX	Yes	No
11579	Old Glory Ins Co		TX	Yes	No
11593	Texas Healthspring LLC	3477	TX	Yes	No
11595	Nations Bonding Co	3479	TX	Yes	Yes
11670	Insurance Co of Scott & White	600	TX	Yes	Yes
11711	Access Ins Co		TX	Yes	No
11762	Vesta Fire Ins Corp	958	TX	Yes	No
11804	Conseco Life Ins Co of TX	233	TX	Yes	No
11853	Ranchers & Farmers Ins Co	3497	TX	Yes	No
11988	Houston Gen Ins Exch	1129	TX	Yes	No
11989	Advocate MD Ins of the SW Inc	1272	TX	Yes	No
12008	Austin Ind Lloyds Ins Co		TX	Yes	No
12174	Legacy Hlth Solutions Inc	3869	TX	Yes	No
12223	Santa Fe Auto Ins Co		TX	Yes	No
12228	American Interstate Ins Co of TX	680	TX	Yes	No
12281	Lone Star RRG Inc		TX	Yes	No
12297	Petroleum Cas Co		TX	Yes	No
12300	American Contractors Ins Co RRG	594	TX	Yes	No
12307	Doral Dental USA Ins Co Inc	4512	TX	Yes	Yes
12346	Valley Baptist Ins Co		TX	Yes	No
12509	MHNet Life & Hlth Ins Co	1137	TX	Yes	No
12525	Cenpatico Behavioral Hlth of TX	1295	TX	Yes	No
12536	Homeowners of Amer Ins Co		TX	Yes	No
12548	American Agri Business Ins Co	3786	TX	Yes	No
12558	Care Improvement Plus of TX Ins Co	4443	TX	Yes	No
12578	Catastrophe Reins Co	200	TX	Yes	Yes
12591	Sierra Title Ins Guar Co		TX	Yes	No
12597	Fidelis Securecare of TX Inc	3744	TX	Yes	No
12598	Texas Heritage Ins Co	171	TX	Yes	Yes
12645	Standard Cas Co		TX	Yes	No
12754	Medicus Ins Co		TX	Yes	No
12810	MDOW Ins Co	4233	TX	Yes	Yes
12827	KS Plan Administrators LLC		TX	Yes	No
12831	State Natl Ins Co Inc	93	TX	Yes	No
12870	Sentruity Cas Co	4277	TX	Yes	No
12877	German Amer Farm Mut		TX	No	No
12898	American Risk Ins Co Inc		TX	Yes	No
12902	Healthspring Life & Hlth Ins Co Inc	3477	TX	Yes	No
12964	Wellcare of TX Inc	1199	TX	Yes	No
13004	Texas Farm Bureau Cas Ins Co	809	TX	Yes	No
13013	Abba Ind Co		TX	No	No
13151	Care N Care Ins Co Inc		TX	Yes	No
13186	Milemeter Ins Co		TX	Yes	No
13242	Titan Ind Co	140	TX	Yes	Yes
13307	Lexon Ins Co	3488	TX	Yes	No
13595	Spartan Ins Co		TX	No	No
13636	Universal HMO of TX Inc	4091	TX	Yes	No
13650	Empire Lloyds Ins Co		TX	Yes	No
13781	US Lloyds Ins Co		TX	Yes	No
13820	Infinity Cnty Mut Ins Co	3495	TX	Yes	No
13938	Metropolitan Lloyds Ins Co TX	241	TX	Yes	No
15156	Shelby Ins Co	958	TX	Yes	No
15458	Delta Lloyds Ins Co Of Houston		TX	Yes	No
15474	National Lloyds Ins Co	732	TX	Yes	No
15628	Lumbermens Underwriters		TX	No	No
15909	Commonwealth Mortgage Assur Co of TX	766	TX	Yes	No
16543	Optimum Prop & Cas Ins Co	1167	TX	Yes	No
18430	Agricultural Workers Mut Auto Ins	2438	TX	Yes	Yes
18597	Slavonic Mut Fire Ins Assoc		TX	No	No
18600	USAA Gen Ind Co	200	TX	Yes	Yes
18635	Old Republic Lloyds Of TX	150	TX	Yes	No
19119	National Unity Ins Co		TX	No	No
19208	Republic Lloyds	3489	TX	Yes	No
19216	Southern Ins Co	3489	TX	Yes	No
19348	Maryland Ins Co	212	TX	Yes	No
19470	Germania Fire & Cas Co	171	TX	Yes	Yes
19496	United Fire & Ind Co	248	TX	Yes	Yes
19518	Catlin Ins Co	4574	TX	Yes	No
19544	Liberty Cnty Mut Ins Co	111	TX	Yes	No
19623	American Summit Ins Co	732	TX	Yes	No
19712	American States Ins Co Of TX	111	TX	Yes	No
19879	Security Natl Ins Co	2538	TX	Yes	No
19887	Trinity Universal Ins Co	215	TX	Yes	No

20028	Beacon Natl Ins Co	175	TX	Yes	Yes
20320	Columbia Lloyds Ins Co	4233	TX	Yes	Yes
20389	Texas Pacific Ind Co	38	TX	Yes	No
20800	Southland Lloyds Ins Co		TX	Yes	No
21075	Cardif Prop & Cas Ins Co	3764	TX	Yes	No
21253	Garrison Prop & Cas Ins Co	200	TX	Yes	Yes
21695	Texas Farmers Ins Co	212	TX	Yes	No
21733	RVOS Farm Mut Ins Co	1342	TX	Yes	Yes
21903	Procentury Ins Co	748	TX	Yes	No
22233	Select Ins Co	3548	TX	Yes	No
22390	Wellington Ins Co		TX	Yes	No
22489	Highlands Ins Co	1116	TX	Yes	No
22608	National Specialty Ins Co	93	TX	Yes	No
22945	Texas Mut Ins Co		TX	No	No
23531	Millers Ins Co		TX	Yes	No
24317	ZC Specialty Ins Co	212	TX	Yes	No
24392	Farmers TX Cnty Mut Ins Co	212	TX	Yes	No
24538	Republic Underwriters Ins Co	3489	TX	Yes	No
25380	Texas Farm Bureau Mut Ins Co	809	TX	Yes	No
25399	Texas Farm Bureau Underwriters	809	TX	Yes	No
25470	American Mercury Lloyds Ins Co	660	TX	Yes	No
25941	USAA	200	TX	Yes	Yes
25968	USAA Cas Ins Co	200	TX	Yes	Yes
26190	Consolidated Ins Assoc	210	TX	Yes	No
26204	Consolidated Lloyds	210	TX	Yes	No
26441	Dairyland Cnty Mut Ins Co of TX	169	TX	Yes	Yes
26530	Allstate TX Lloyds	8	TX	Yes	No
26689	Trinity Lloyds Ins Co	2538	TX	Yes	No
26816	State Farm Cnty Mut Ins Co Of TX	176	TX	Yes	Yes
27090	Young Amer Ins Co		TX	Yes	No
27170	Texas Builders Ins Co		TX	Yes	No
27774	Chubb Lloyds Ins Co Of TX	38	TX	Yes	No
27820	Farm Bureau Cnty Mut Ins Co of TX	809	TX	Yes	No
27863	Southern Cnty Mut Ins Co	3489	TX	Yes	No
28673	Mid Century Ins Co of TX	212	TX	Yes	No
28746	Equity Ins Co	3179	TX	Yes	No
28843	Reliable LLoyds Ins Co	19	TX	Yes	No
29033	Cranbrook Ins Co	3299	TX	Yes	No
29181	Firemans Fund Cnty Mut Ins Co	761	TX	Yes	No
29203	Progressive Cnty Mut Ins Co	155	TX	Yes	No
29211	Capitol Cnty Mut Fire Ins Co	215	TX	Yes	No
29238	Viking Cnty Mut Ins Co	169	TX	Yes	Yes
29246	Consumers Cnty Mut Ins Co	210	TX	Yes	No
29254	Foremost Cnty Mut Ins Co	212	TX	Yes	No
29262	Colonial Cnty Mut Ins Co	140	TX	Yes	Yes
29297	Home State Cnty Mut Ins Co	3179	TX	Yes	No
29300	Oak Brook Cnty Mut Ins Co	257	TX	Yes	No
29319	American Natl Cnty Mut Ins Co	408	TX	Yes	Yes
29327	AAA TX Cnty Mut Ins Co	1318	TX	Yes	Yes
29335	Allstate Cnty Mut Ins Co	8	TX	Yes	No
29351	Unitrin Cnty Mut Ins Co	215	TX	Yes	No
29378	Old Amer Cnty Mut Fire Ins Co		TX	Yes	No
29394	Mercury Cnty Mut Ins Co	660	TX	Yes	No
29408	Hallmark Cnty Mut Ins Co	3478	TX	Yes	No
29491	Financial Ins Co Of Amer		TX	Yes	No
29548	Western Ind Ins Co	456	TX	Yes	No
29599	US Specialty Ins Co	984	TX	Yes	No
29610	Germania Farm Mut Ins Assoc	171	TX	Yes	Yes
30023	American Standard Lloyds Ins Co	761	TX	Yes	No
30040	Texas Windstorm Ins Assoc		TX	No	No
30325	Zale Ind Co	669	TX	Yes	No
30503	Shelby Cas Ins Comp	958	TX	Yes	No
31054	Hochheim Prairie Farm Mut Ins Assoc	147	TX	Yes	Yes
31283	Guideone Lloyds Ins Co	303	TX	Yes	Yes
31933	American States Lloyds Ins Co	111	TX	Yes	No
31984	Members Serv Ins Co	120	TX	Yes	No
32271	Dallas Natl Ins Co	1631	TX	Yes	No
32514	Texas Hospital Ins Exch		TX	Yes	No
32557	American Physicians Ins Co		TX	Yes	No
32697	Texas Medical Liab Ins Undwriting As		TX	No	No
32875	British Amer Ins Co		TX	Yes	No
33170	Producers Lloyds Ins Co	3382	TX	Yes	No
34312	Producers Agriculture Ins Co	3382	TX	Yes	No
35009	Financial Cas & Surety Inc		TX	Yes	No
35564	Sunbelt Ins Co		TX	Yes	No

35629	Association Cas Ins Co	807	TX	Yes	Yes
36331	Texas Lawyers Ins Exch		TX	No	No
36854	Germania Ins Co	171	TX	Yes	Yes
36862	Hochheim Prairie Cas Ins Co	147	TX	Yes	Yes
36943	Priority One Ins Co	1342	TX	Yes	Yes
37524	Charter Ind Co	215	TX	Yes	No
37559	Underwriters Lloyds Ins Co	506	TX	Yes	No
38024	Great Amer Lloyds Ins Co	84	TX	Yes	No
38253	Hartford Lloyds Ins Co	91	TX	Yes	No
38318	Starr Ind & Liab Co	4670	TX	Yes	No
38849	Houston Gen Ins Co	1129	TX	Yes	No
38857	Traders & Gen Ins Co	1129	TX	Yes	No
39489	OneBeacon Lloyd's of TX	1129	TX	Yes	No
40150	MGA Ins Co Inc		TX	Yes	No
40673	Colonial Lloyds	878	TX	Yes	No
40843	Universal Underwriters Of TX Ins	212	TX	Yes	No
41211	Triton Ins Co	41	TX	Yes	No
41262	Travelers Lloyds Ins Co	3548	TX	Yes	No
41351	Kemper Ins Co of TX	108	TX	Yes	Yes
41564	Travelers Lloyds Of TX Ins Co	3548	TX	Yes	No
41602	Hanover Lloyds Ins Co	88	TX	Yes	No
41688	Foremost Lloyds Of TX	212	TX	Yes	No
42005	American Modern Lloyds Ins Co	361	TX	Yes	No
42056	Slavonic Ins Co Of TX		TX	Yes	Yes
42110	Nationwide Lloyds	140	TX	Yes	Yes
42374	Houston Cas Co	984	TX	Yes	No
42382	CMI Lloyds	36	TX	Yes	Yes
42668	Vesta Ins Corp	958	TX	Yes	No
43133	Apex Lloyds Ins Co	4278	TX	Yes	No
43141	Alicot Ins Co	24	TX	Yes	Yes
43192	Colonial Mortgage Ins Co	878	TX	Yes	No
43265	Gramercy Ins Co		TX	Yes	No
43273	Insurors Ind Co	3279	TX	Yes	No
43338	Amcorp Ins Co		TX	Yes	No
43354	San Antonio Ind Co		TX	Yes	No
43370	Sentry Lloyds Of TX	169	TX	Yes	Yes
43389	Service Lloyds Ins Co	681	TX	Yes	No
43419	State Farm Lloyds	176	TX	Yes	Yes
43435	Union Standard Lloyds	98	TX	Yes	No
43451	Utica Specialty Risk Ins Co	201	TX	Yes	Yes
43460	FFG Ins Co	31	TX	Yes	No
43478	Utica Natl Ins Co Of TX	201	TX	Yes	Yes
43486	Warranty Underwriters Ins Co	1226	TX	Yes	No
43494	American Hallmark Ins Co Of TX	3478	TX	Yes	No
43559	United Fire LLoyds	248	TX	Yes	Yes
43885	Texas Select Lloyds Ins Co	958	TX	Yes	No
50016	Title Resources Guar Co		TX	Yes	No
50121	Stewart Title Guar Co	340	TX	Yes	No
50598	Alamo Title Ins	670	TX	Yes	No
52556	Managed DentalGuard Inc	429	TX	Yes	Yes
52635	El Paso First Hlth Plans Inc		TX	Yes	No
57339	Grand Court Order Of Calanthe		TX	No	No
57347	Catholic Life Ins		TX	No	No
57355	Catholic Family Fraternal Of TX		TX	No	No
57363	Catholic Union Of TX		TX	No	No
57371	Moslah Benefit Fund		TX	No	No
57436	SPJST		TX	No	No
57444	Grand Lodge Sons Of Hermann In Tx		TX	No	No
60019	Cass Cnty Life Ins Co		TX	No	No
60069	Texas Hlth Ins Risk Pool		TX	No	No
60092	Amil Intl Ins Co	1121	TX	Yes	No
60291	American Capitol Ins Co	4299	TX	Yes	No
60445	Sagicor Life Ins Co	3766	TX	Yes	No
60488	American Gen Life Ins Co	12	TX	Yes	No
60518	American Hlth & Life Ins Co	41	TX	Yes	No
60739	American Natl Ins Co	408	TX	Yes	Yes
60984	Compbenefits Ins Co	119	TX	Yes	No
61328	Bankers Life Ins Co Of Amer		TX	No	No
61581	Capitol Life Ins Co	3436	TX	Yes	No
61735	Central Security Life Ins Co	526	TX	Yes	No
61859	Christian Fidelity Life Ins Co	574	TX	Yes	No
61999	Americo Fin Life & Ann Ins Co	449	TX	Yes	No
62324	Freedom Life Ins Co Of Amer	839	TX	Yes	No
62359	Constitution Life Ins Co	953	TX	Yes	No
63053	Family Life Ins Co	1117	TX	Yes	No

63479	United Teacher Assoc Ins Co	84	TX	Yes	No
63487	Investors Life Ins Co N Amer	449	TX	Yes	No
63657	Garden State Life Ins Co	408	TX	Yes	Yes
63967	Government Personnel Mut Life Ins Co		TX	No	No
64017	Jefferson Natl Life Ins Co		TX	Yes	No
64688	SCOR Global Life US Re Ins Co	749	TX	Yes	No
64696	First Continental Life & Acc	4506	TX	Yes	No
65528	Life Ins Co Of The Southwest	634	TX	Yes	No
65560	Life Protection Ins Co	210	TX	Yes	No
65960	Windsor Life Ins Co	1167	TX	Yes	No
66087	Mid West Natl Life Ins Co Of TN	264	TX	Yes	No
66117	Southwest Life & Hlth Ins Co	3549	TX	Yes	No
66516	NAP Life Ins Co		TX	Yes	No
66532	National Farm Life Ins Co	2458	TX	Yes	Yes
66540	National Farmers Union Life Ins Co	449	TX	Yes	No
66575	Reliance Standard Life Ins Co of TX	74	TX	Yes	No
67148	Occidental Life Ins Co Of NC	1327	TX	Yes	No
67180	Ohio State Life Ins Co	449	TX	Yes	No
67296	Laurel Life Ins Co	3766	TX	Yes	No
67580	North Amer Life Ins Co	3787	TX	Yes	No
67784	Philadelphia Amer Life Ins Co	520	TX	Yes	No
67873	Pioneer Amer Ins Co	1327	TX	Yes	No
67920	Germania Life Ins Co	171	TX	Yes	Yes
67946	Pioneer Security Life Ins Co	1327	TX	Yes	No
68020	Mcdonald Life Ins Co		TX	Yes	No
68047	Professional Ins Co	549	TX	Yes	No
68071	Puritan Life Ins Co		TX	Yes	No
68179	Provident Amer Ins Co		TX	Yes	No
68446	Longevity Ins Co		TX	Yes	No
68594	American Amicable Life Ins Co Of TX	1327	TX	Yes	No
69396	Texas Life Ins Co	4213	TX	Yes	No
69493	Tower Life Ins Co		TX	No	No
69663	USAA Life Ins Co	200	TX	Yes	Yes
69698	New Era Life Ins Co Of Midwest	520	TX	Yes	No
69701	Union Bankers Ins Co	953	TX	Yes	No
69833	Lincoln Memorial Life Ins Co	722	TX	Yes	No
69914	Sears Life Ins Co	41	TX	Yes	No
70238	Variable Ann Life Ins Co	12	TX	Yes	No
70432	Western Natl Life Ins Co	12	TX	Yes	No
70745	Texas Security Mut Life Ins Co		TX	No	No
71072	Marquette Natl Life Ins Co	953	TX	Yes	No
71773	American Natl Life Ins Co Of TX	408	TX	Yes	Yes
73121	Champions Life Ins Co	526	TX	Yes	No
73547	Colonial Security Life Ins Co		TX	Yes	No
74004	Family Serv Life Ins Co	429	TX	Yes	Yes
74065	Legacy Hlth Plan Inc	3869	TX	Yes	No
74926	Memorial Serv Life Ins Co	722	TX	Yes	No
76538	Presidential Life Ins Co		TX	Yes	No
77119	Sentinel Amer Life Ins Co	429	TX	Yes	Yes
77127	Forethought Natl Life Ins Co	1266	TX	Yes	No
77151	Service Life & Cas Ins Co	681	TX	Yes	No
77194	United Funeral Directors Benefit Lif	1323	TX	Yes	Yes
78093	Financial Assur Life Ins Co	449	TX	Yes	No
78743	New Era Life Ins Co	520	TX	Yes	No
80993	Western Amer Life Ins Co	526	TX	Yes	No
81132	Life of Amer Ins Co		TX	No	No
81833	American Industries Life Ins Co		TX	No	No
81930	First American Life Ins Co		TX	Yes	No
82007	First Command Life Ins Co		TX	Yes	No
82082	Citizens Natl Life Ins Co	612	TX	Yes	No
82228	Allied Fin Ins Co		TX	No	No
82244	International Amer Life Ins Co	1339	TX	Yes	No
82252	Landmark Life Ins Co		TX	Yes	No
82341	Preferred Security Life Ins Co		TX	Yes	No
82392	Regal Life Of Amer Ins Co	1339	TX	Yes	No
82430	Southwest Serv Life Ins Co	1339	TX	Yes	No
82473	Family Life Ins Co Of Amer	1233	TX	Yes	No
82538	National Hlth Ins Co	4669	TX	Yes	No
82686	Hawthorn Life Ins Co	1323	TX	Yes	Yes
83160	Texas Serv Life Ins Co		TX	No	No
85332	Capitol Security Life Ins Co	1339	TX	Yes	No
85928	Family Liberty Life Ins Co		TX	Yes	No
86169	Texas Intl Life Ins Co		TX	No	No
86355	Standard Life & Accident Ins Co	408	TX	Yes	Yes
86371	Ullico Life Ins Co	781	TX	Yes	No

86959	National Family Care Life Ins Co		TX	No	No
87017	Scor Global Life Re Ins Co of TX	749	TX	Yes	No
87645	United Fidelity Life Ins Co	449	TX	Yes	No
87661	Dorsey Life Ins Co		TX	No	No
87823	TJM Life Ins Co		TX	No	No
87963	National Teachers Assoc Life Ins Co		TX	Yes	No
88099	Optimum Re Ins Co	1167	TX	Yes	No
88153	Colonial Life Ins Co Of TX	878	TX	Yes	No
88595	Emphesys Ins Co	119	TX	Yes	No
89087	Enterprise Life Ins Co		TX	Yes	No
90212	Great Southern Life Ins Co	449	TX	Yes	No
90328	First Hlth Life & Hlth Ins Co	1137	TX	Yes	No
90387	United Assur Life Ins Co	1339	TX	Yes	No
90638	Best Life & Hlth Ins Co		TX	Yes	No
91790	Tandy Life Ins Co		TX	Yes	No
94790	Jefferson Life Ins Co	1631	TX	Yes	No
95024	Humana Hlth Plan of TX Inc	119	TX	Yes	No
95037	Cigna Dental Hlth of TX Inc	901	TX	Yes	No
95051	Safeguard Hlth Plans Inc	241	TX	Yes	No
95099	Scott & White Hlth Plan	600	TX	Yes	Yes
95138	SHA LLC	3549	TX	Yes	No
95142	United Dental Care Of TX Inc	19	TX	Yes	No
95160	United Concordia Dental Plans TX Inc	812	TX	Yes	Yes
95161	Denticare Inc	119	TX	Yes	No
95163	Alpha Dental Programs Inc	2479	TX	Yes	No
95174	Pacificare Of TX Inc	707	TX	Yes	No
95240	Seton Hlth Plan Inc		TX	Yes	No
95247	MNM 1997 Inc	4506	TX	Yes	No
95248	Community First Hlth Plans Inc	2738	TX	Yes	Yes
95251	National Pacific Dental Inc	707	TX	Yes	No
95302	Aecc Total Vision Hlth Plan Of TX	1295	TX	Yes	No
95313	Vista Hlth Plan Inc		TX	Yes	No
95314	AMERIGROUP TX Inc	1156	TX	Yes	No
95326	Comprehensive Hlth Serv of TX Inc	1150	TX	Yes	No
95329	Texas Childrens Hlth Plan Inc		TX	Yes	No
95383	Cigna Hlthcare of TX Inc	901	TX	Yes	No
95387	Block Vision Of TX Inc		TX	Yes	No
95414	Parkland Comm Hlth Plan Inc		TX	Yes	No
95415	Great W Hlthcare of TX Inc	901	TX	Yes	No
95420	Unicare Hlth Plans of TX Inc	671	TX	Yes	No
95490	Aetna Hlth Inc TX Corp	1	TX	Yes	No
95522	Pearle Vision Managed Care Hmo TX		TX	No	No
95594	Amil Intl TX Inc	1121	TX	Yes	No
95615	Community Hlth Choice Inc		TX	Yes	No
95647	Superior Hlthplan Inc	1295	TX	Yes	No
95764	UTMB Hlth Plans Inc		TX	Yes	No
95765	UnitedHealthcare of TX Inc	707	TX	Yes	No
95799	Value Options of TX Inc	965	TX	Yes	No
95809	Driscoll Childrens Hlth Plan		TX	Yes	No
95822	Cook Childrens Hlth Plan		TX	Yes	No
95879	AmCare Hlth Plans of TX Inc	1307	TX	Yes	No
95910	Aetna Dental Inc	1	TX	Yes	No
97888	IBC Life Ins Co		TX	Yes	No
98205	National Found Life Ins Co	839	TX	Yes	No
98248	Ambassador Life Ins Co		TX	Yes	No
99449	Texas Imperial Life Ins Co	1323	TX	Yes	Yes
99457	Fringe Benefit Life Ins Co		TX	Yes	No
99465	Servco Life Ins Co	4277	TX	Yes	No
99473	Trans Western Life Ins Co	3787	TX	Yes	No
99481	First Natl Ind Life Ins Co		TX	Yes	No
99538	Employees Life Ins Co		TX	Yes	No
99546	Texas Directors Life Ins Co	801	TX	Yes	No
99600	American Century Life Ins Co TX	1340	TX	Yes	No
99619	American Farm Life Ins Co	2458	TX	Yes	Yes
99759	Lone Star Life Ins Co	1233	TX	Yes	No
99767	Dallas Gen Life Ins Co	574	TX	Yes	No
99775	Funeral Directors Life Ins Co	801	TX	Yes	No
99805	Lewis Life Ins Co		TX	No	No
-	Austin County Farmers Mutual Fire Ins Assoc. Incorporated		TX	No	No
-	Comppac Trust of Texas, The		TX	No	No
-	Edgar Burial Assoc.		TX	No	No
-	Educators Employment Protection Corp.		TX	No	No
-	Engle Farmers Mutual Benefit Assoc		TX	No	No
-	Farmers Mutual Aid Assoc of Washington County Tx		TX	No	No
-	Farmers Mutual Fire & Aid Assoc of Kendall And Kerr Counties Tx		TX	No	No

-	Farmers Mutual Fire Ins Assoc of Comal County		TX	No	No
-	Farmers Mutual Ins Assoc of Burnet County		TX	No	No
-	Farmers Mutual Ins Assoc of Erath County		TX	No	No
-	Garfield Farm Mutual Ins. Assoc.		TX	No	No
-	Gillespie Farm Mutual Ins. Co.		TX	No	No
-	Legal Access Plan of Texas		TX	No	No
-	Logistics Trust of Texas, The		TX	No	No
-	Mercantile Trust of Texas, The		TX	No	No
-	Muenster Farm Mutual Fire Ins. Assoc. Inc.		TX	No	No
-	SPDDS Employees Benefit Trust		TX	No	No
-	Stonewall Farm Mutual Ins. Co.		TX	No	No
-	Sullivan Service Ins Assoc		TX	No	No
-	Texas Agricultural Cooperative Trust		TX	No	No
-	Texas Alliance of Energy Producers Workers Compensation Self Insu		TX	No	No
-	Texas Assoc of Community Health Centers Employee Benefit Group,		TX	No	No
-	Texas Automobile Dealers Self Insurers Group		TX	No	No
-	Texas Construction Trust		TX	No	No
-	Texas Cotton Ginners' Trust		TX	No	No
-	Texas Legal Protection Plan Inc.		TX	No	No
-	Texas Pioneer Farm Mutual Ins Assoc Inc.		TX	No	No
-	Texas Sonic Employers Trade Assoc, Inc.		TX	No	No
-	Williams Life Ins. Co.		TX	No	No
10033	Workers Comp Fund	1147	UT	Yes	Yes
10118	EZ Auto Ins Co	4682	UT	Yes	No
11174	Alpha Dental of UT Inc	2479	UT	Yes	No
11560	Total Dental Administrators of UT	3415	UT	Yes	No
12200	American Liberty Ins Co		UT	No	No
12256	United Ins Co	4682	UT	Yes	No
12514	Educators Hlth Plans Hlth Inc	126	UT	Yes	Yes
12515	Educators Hlth Plans Life Accident &	126	UT	Yes	Yes
12520	Utah Business Ins Co Inc		UT	No	No
12533	Opticare of UT		UT	No	No
12908	Humana Medical Plan of UT Inc	119	UT	Yes	No
13471	Bear River Mut Ins Co		UT	No	No
26697	Casualty Underwriters Ins Co		UT	Yes	No
34487	Professional Underwriters Liab Ins C	831	UT	Yes	Yes
36676	Utah Medical Ins Assoc		UT	No	No
37109	Landcar Cas Co	503	UT	Yes	No
37435	Professional Ins Exc		UT	No	No
54550	Regence BCBS of UT	1207	UT	Yes	No
60104	Univantage Ins Co	1147	UT	Yes	Yes
61395	Beneficial Life Ins Co	615	UT	Yes	No
62952	Equitable Life & Cas Ins Co		UT	No	No
63245	SelectHealth Benefit Assur Co Inc	880	UT	Yes	No
63444	Accendo Ins Co	4667	UT	Yes	No
68420	Western Mut Ins		UT	No	No
68802	Sentinel Security Life Ins Co		UT	No	No
69485	Security Natl Life Ins Co	454	UT	Yes	No
71480	Great Western Ins Co	1280	UT	Yes	No
71706	Standard Life & Cas Ins Co		UT	No	No
77674	Town & Country Life Ins Co		UT	No	No
81019	Deseret Mut Ins Co	615	UT	Yes	No
81701	Educators Mut Ins Assoc	126	UT	Yes	Yes
92274	Landcar Life Ins Co	503	UT	Yes	No
93696	Fidelity Investments Life Ins Co	981	UT	Yes	No
95153	SelectHealth Inc	880	UT	Yes	No
95303	Healthwise	1207	UT	Yes	No
95407	Altius Hlth Plans Inc	1137	UT	Yes	No
95450	United Dental Care Of UT Inc	19	UT	Yes	No
95501	United Hlthcare of UT Inc	707	UT	Yes	No
95502	Molina Hlthcare of UT Inc DBA Amfam	1531	UT	Yes	No
95515	Educators Hlth Care	126	UT	Yes	Yes
95518	Cigna Hlthcare of UT Inc	901	UT	Yes	No
-	AFS Trust		UT	Yes	No
-	AAN Insurance Company, Inc.		UT	Yes	No
-	Aberdeen Insurance Company, Inc.		UT	Yes	No
-	Acania Insurance Company, Inc.		UT	Yes	No
-	AFS Security Insurance Company		UT	Yes	No
-	Agricultural Specialty Lines Insurance Company		UT	Yes	No
-	Alexis Insurance Corporation		UT	Yes	No
-	Alpha Insurance Company, Inc.		UT	Yes	No
-	Alta Insurance Company		UT	Yes	No
-	AMEE Insurance Company		UT	Yes	No
-	American Golden Insurance Company, Inc		UT	Yes	No
-	Amritsar Insurance Company		UT	Yes	No

-	Antelope Insurance Company, Inc	UT	Yes	No
-	Arlington Fidelity Insurance Company, Inc.	UT	Yes	No
-	Artisans Insurance Company, Inc.	UT	Yes	No
-	Ashford Insurance Company, Inc.	UT	Yes	No
-	Associated Risk Insurance Solutions, Inc.	UT	Yes	No
-	Atlantis Insurance Company, Inc.	UT	Yes	No
-	Ayrshire Insurance Company	UT	Yes	No
-	Banchory Insurance Company	UT	Yes	No
-	Belmont Insurance Company, Inc.	UT	Yes	No
-	Beneficial Reinsurance Company	UT	Yes	No
-	Bordeaux Insurance Company, Inc.	UT	Yes	No
-	Bristol Insurance Company	UT	Yes	No
-	Cambridge Insurance Company	UT	Yes	No
-	Canefield Insurance Company	UT	Yes	No
-	Canterbury Insurance Company	UT	Yes	No
-	Capital Casualty Insurance Company, Inc.	UT	Yes	No
-	Capstone Insurance Company, Inc.	UT	Yes	No
-	Carlbeth Insurance Company, Inc.	UT	Yes	No
-	Carlisle Insurance Company	UT	Yes	No
-	Caseford Insurance Company	UT	Yes	No
-	Catch-All Insurance Company, Inc.	UT	Yes	No
-	Central Utah Insurance Company	UT	Yes	No
-	Chalbury Insurance Company	UT	Yes	No
-	Chartwell Insurance Company	UT	Yes	No
-	Chemical Indemnity Insurance Company	UT	Yes	No
-	CJT Insurance Company, Inc.	UT	Yes	No
-	CKT Insurance Services, Inc.	UT	Yes	No
-	Clarion Insurance Company, Inc.	UT	Yes	No
-	Compagnie d'Assurances de Bonheur, Inc.	UT	Yes	No
-	Compendium Insurance Company, Inc.	UT	Yes	No
-	Confluence Insurance Company, Inc.	UT	Yes	No
-	Cumberland Specialty Lines	UT	Yes	No
-	Darco Insurance Company, Inc.	UT	Yes	No
-	Davco Insurance Company, Inc.	UT	Yes	No
-	Delta Insurance Company, Inc.	UT	Yes	No
-	Dublin Insurance Company	UT	Yes	No
-	Eagle Insurance Company, Inc	UT	Yes	No
-	Earby Insurance Company	UT	Yes	No
-	Elite Guaranty Insurance Company Inc	UT	Yes	No
-	Experience Capital Insurance, Inc.	UT	Yes	No
-	Fairway Insurance Company, Inc.	UT	Yes	No
-	Finch Insurance Co., Inc	UT	Yes	No
-	Finch Financial II Insurance Company, Inc.	UT	Yes	No
-	FLS Insurance Company, Inc.	UT	Yes	No
-	Flying J Insurance Company	UT	Yes	No
-	Freedom Insurance Company, Inc.	UT	Yes	No
-	Fulham Insurance Company	UT	Yes	No
-	G3 Insurance Group	UT	Yes	No
-	Gen5 Risk Management, Inc.	UT	Yes	No
-	Golden J. Insurance Company	UT	Yes	No
-	Great Lakes Insurance Group, Inc.	UT	Yes	No
-	Greencrest Insurance Company, Inc.	UT	Yes	No
-	Green Horizon Insurance Company, Inc.	UT	Yes	No
-	Grocery Specialty Lines Insurance Company	UT	Yes	No
-	Growers Insurance Group, Inc.	UT	Yes	No
-	Hamilton Fidelity Insurance Company, Inc.	UT	Yes	No
-	Hampton Soules Insurance Company	UT	Yes	No
-	H & B Insurance Company, Inc.	UT	Yes	No
-	I Builder Insurance Corporation	UT	Yes	No
-	ICON Property and Casualty Company	UT	Yes	No
-	Industrial Insurance Services, Inc.	UT	Yes	No
-	Infinity Group Insurance Company, Inc.	UT	Yes	No
-	International Risk Insurance Company	UT	Yes	No
-	Investors Assurance Company	UT	Yes	No
-	Jameson Insurance Company, Inc.	UT	Yes	No
-	JKT Insurance Company	UT	Yes	No
-	Kanarra Mountain Captive Insurance Company, Inc.	UT	Yes	No
-	Ketch Insurance Company, Inc.	UT	Yes	No
-	Kornerstone Guaranty Insurance Company	UT	Yes	No
-	LD Insurance Company	UT	Yes	No
-	Legacy Insurance Company, Inc.	UT	Yes	No
-	Liberty First Risk Retention Group Insurance Company	UT	Yes	No
-	Lincoln Indemnity Company	UT	Yes	No
-	Livingston National Insurance Company Inc	UT	Yes	No
-	Lord Insurance Group, Inc.	UT	Yes	No

-	Madrid Insurance Company, Inc.		UT	Yes	No
-	Massac Insurance Company I, Inc.		UT	Yes	No
-	Massac Insurance Company II, Inc.		UT	Yes	No
-	Massac Insurance Company III, Inc.		UT	Yes	No
-	McKinley Insurance Company, Inc.		UT	Yes	No
-	Monterey Insurance Company Inc		UT	Yes	No
-	Movco Insurance Company, Inc.		UT	Yes	No
-	Muirfield Insurance Company, Inc.		UT	Yes	No
-	MWM Insurance Corporation		UT	Yes	No
-	Necka Financial, Inc.		UT	Yes	No
-	NiSource Insurance Corporation, Inc.		UT	Yes	No
-	Northwestern Indemnity Inc		UT	Yes	No
-	Oak Park Insurance Company, Inc.		UT	Yes	No
-	Old Harbor National Insurance Company, Inc.		UT	Yes	No
-	Omega Insurance Company		UT	Yes	No
-	Pacific Crest Financial, Inc.		UT	Yes	No
-	Palladian II Insurance Company, Inc.		UT	Yes	No
-	Palladian III Insurance Company, Inc.		UT	Yes	No
-	Palladian Insurance Company, Inc.		UT	Yes	No
-	P&D Insurance Company, Inc.		UT	Yes	No
-	Peralta Insurance Company Inc		UT	Yes	No
-	Pinnacle Insurance Services Company		UT	Yes	No
-	Plastic Surgery Risk Management Solutions, Inc.		UT	Yes	No
-	Provincial Insurance Group, Inc., The		UT	Yes	No
-	Public Accountants Insurance Group		UT	Yes	No
-	RCJ Insurance Company, Inc.		UT	Yes	No
-	Remarkable Insurance Group, Inc.		UT	Yes	No
-	Richmond Insurance Company		UT	Yes	No
-	Riekerhaven Indemnity Company		UT	Yes	No
-	Riverside Group Insurance Company, Inc.		UT	Yes	No
-	Rosedale Insurance Company, Inc.		UT	Yes	No
-	Royal Grace Insurance Company		UT	Yes	No
-	Safety Net Insurance Company, Inc.		UT	Yes	No
-	Sagewood Insurance Company		UT	Yes	No
-	SE Insurance Company, Inc.		UT	Yes	No
-	Shimla Insurance Company		UT	Yes	No
-	Silver Lake Risk Services		UT	Yes	No
-	SMB Insurance Company, Inc.		UT	Yes	No
-	Somerset Insurance Company, Inc.		UT	Yes	No
-	St. Malo Insurance Company, Inc.		UT	Yes	No
-	Star Risk Insurance Company		UT	Yes	No
-	Strategic Insurance Company, Inc.		UT	Yes	No
-	Tarpon Insurance Company, Inc.		UT	Yes	No
-	TC Insurance, Inc.		UT	Yes	No
-	Tevaka Insurance Company, Inc.		UT	Yes	No
-	Tiger Insurance Company, Inc.		UT	Yes	No
-	Transportation Alliance Insurance Company		UT	Yes	No
-	Tri-Coastal Insurance Company, Inc		UT	Yes	No
-	Quorum Insurance Company		UT	Yes	No
-	Uinta Insurance Company, Inc.		UT	Yes	No
-	Unison Protective Insurance Company, Inc.		UT	Yes	No
-	Utah Peaks Insurance Company, Inc.		UT	Yes	No
-	V247 Insurance Company, Inc.		UT	Yes	No
-	Valle Vista Insurance Company, Inc.		UT	Yes	No
-	Ward Insurance Company Inc.		UT	Yes	No
-	Washington National Insurance Company, Inc.		UT	Yes	No
-	Western Builders Insurance Group LLC		UT	Yes	No
-	Whitecliff Insurance Company, Inc.		UT	Yes	No
-	Worthington Whitehall Insurance Company, Inc.		UT	Yes	No
-	W.R. Porter Insurance Co., Inc.		UT	Yes	No
-	Zephyr Assurance Company		UT	Yes	No
-	Zmyslo Indemnity, Inc.		UT	Yes	No
10086	Virginia Farm Bureau Town & Cntry	203	VA	Yes	No
10121	Penn Patriot Ins Co	920	VA	Yes	No
10153	AMERIGROUP VA Inc	1156	VA	Yes	No
10196	Northern Neck Ins Co		VA	No	No
10214	Rockingham Mut Ins Co	899	VA	Yes	No
10329	Loudoun Mut Ins Co		VA	No	No
11227	Capital Care Inc	380	VA	Yes	Yes
12972	DaVita Villagehealth of VA Inc	4422	VA	Yes	No
13029	Grayson Carroll Wythe Mut Ins Co		VA	No	No
13060	Building Industry Ins Assn Inc		VA	Yes	No
13103	Dan River Farmers Mut Fire Ins Co		VA	No	No
13104	Smyth Cnty Mut Ins Co		VA	Yes	No
13105	Interstate Mut Fire Ins Co		VA	No	No

13106	Commonwealth Mut Fire Ins Co		VA	No	No
13107	United Legal Benefits of VA Inc		VA	No	No
13108	Highland Mut Fire Ins Co		VA	No	No
13109	Rappahannock Home Mut Fire Ins Co		VA	No	No
13111	Pulaski & Giles Mut Ins Co		VA	No	No
13112	Farmers Mut Fire Ins Co of Scott Lee		VA	No	No
13113	Farmers Mut Fire Ins Co of Washingto		VA	No	No
13114	Patrick Cnty Farmers Mut Ins Co of V		VA	No	No
13115	Blue Ridge Mut Assn Inc		VA	No	No
13116	Rockbridge Mut Fire Ins Co		VA	No	No
13117	Shenandoah Mut Fire Ins Co		VA	No	No
13118	Floyd Cnty Mut Fire Ins Co Inc		VA	No	No
13119	nHealth Inc		VA	Yes	No
13628	Carilion Clinic Medicare Resources L		VA	Yes	No
13685	James River Cas Co	3494	VA	Yes	No
13688	Elephant Ins Co		VA	Yes	No
15709	Southern States Ins Exch		VA	Yes	No
18791	Alfa Alliance Ins Corp	5	VA	Yes	Yes
26026	Virginia Farm Bureau Fire & Cas Ins	203	VA	Yes	No
26034	Virginia Farm Bureau Mut Ins Co	203	VA	Yes	No
26867	Southern Ins Co Of VA	250	VA	Yes	Yes
28851	Augusta Mut Ins Co		VA	No	No
28932	Markel Amer Ins Co	785	VA	Yes	No
33740	Mutual Assur Society Of VA		VA	No	No
33812	Reciprocal of Amer		VA	No	No
34118	Colony Natl Ins Co	457	VA	Yes	No
35661	VA Municipal Self Ins Assn Liab Pool		VA	No	No
35688	Prince William Self Ins Grp Cas		VA	No	No
35750	Virginia Transit Liab Pool		VA	No	No
39993	Colony Ins Co	457	VA	Yes	No
41246	How Ins Co A RRG		VA	Yes	No
42595	Rockingham Cas Co	899	VA	Yes	No
50792	Southern Title Ins Corp	228	VA	Yes	Yes
52617	Cigna Dental Hlth of VA Inc	901	VA	Yes	No
53031	Mid Atlantic Vision Serv Plan Inc	1189	VA	Yes	No
55611	Delta Dental of VA		VA	Yes	No
63266	First Dominion Mut Life Ins Co		VA	No	No
65536	Genworth Life & Ann Ins Co	4011	VA	Yes	No
68845	Shenandoah Life Ins Co		VA	Yes	Yes
70715	Optima Hlth Ins Co	1183	VA	Yes	No
71835	Anthem Hlth Plans of VA Inc	671	VA	Yes	No
88374	Commonwealth Dealers Life Ins Co		VA	No	No
95167	Peninsula Hlth Care Inc	671	VA	Yes	No
95169	Healthkeepers Inc	671	VA	Yes	No
95281	Optima Hlth Plan	1183	VA	Yes	No
95481	Optima Hlth Grp Inc	1183	VA	Yes	No
95612	Virginia Premier Hlth Plan Inc		VA	Yes	No
95657	Dominion Dental Serv Inc	1230	VA	Yes	No
95713	DentaQuest VA Inc	4512	VA	Yes	Yes
95811	Piedmont Comm Hlthcare Inc		VA	Yes	No
96512	Priority Hlthcare Inc	671	VA	Yes	No
96555	Southern Hlth Serv Inc	1137	VA	Yes	No
97144	Jamestown Life Ins Co	4011	VA	Yes	No
10020	United Educators Ins RRG Inc		VT	No	No
10023	Alliance Of Nonprofits For Ins RRG		VT	No	No
10069	Housing Authority Prop A Mut Co	4359	VT	Yes	No
10075	Consumer Specialties Ins Co RRG		VT	No	No
10081	Ambassador Ins Co		VT	No	No
10083	The Natl Catholic RRG Inc		VT	No	No
10084	Title Industry Assur Co RRG		VT	No	No
10101	Premier Ins Exch RRG		VT	No	No
10113	Terra Ins Co RRG		VT	No	No
10114	Nonprofits Mut Rrg Inc		VT	No	No
10115	Eastern Dentists Ins Co RRG		VT	No	No
10116	Ram I I C Inc		VT	No	No
10143	Old Cresent Ins Co		VT	Yes	No
10152	The Hlthcare Underwriting Co RRG		VT	No	No
10163	General Eastern Ski Ins RRG Inc		VT	No	No
10164	Cpa Mut Ins Co Of Amer RRG		VT	No	No
10171	Ordinary Mut RRG Corp		VT	No	No
10174	Bar Vermont RRG Inc		VT	No	No
10341	Controlled Risk Ins Co Of VT RRG		VT	No	No
10353	Ooida RRG Inc		VT	No	No
10401	Abs Boiler & Marine Ins Co		VT	Yes	No
10402	Investor Protection Ins Co		VT	Yes	No

10406	Little Neck Ins Co		VT	Yes	No
10407	Mansfield Ins Co		VT	Yes	No
10408	Mary Cap Ins Inc		VT	Yes	No
10411	Managed Care Ind Inc	119	VT	Yes	No
10416	Mountain Ind Ins Co		VT	Yes	No
10419	Middlesex Assur Co		VT	Yes	No
10420	Monument Select Ins Co		VT	Yes	No
10422	MPC Ins Ltd		VT	No	No
10425	Nazareth Assur Co		VT	Yes	No
10426	Tall Pines Ins co		VT	Yes	No
10428	National Telecom Corp		VT	No	No
10431	Nittany Ins Co		VT	Yes	No
10432	Berdan Ins Co		VT	Yes	No
10433	Northeast Ind Co		VT	Yes	No
10435	Nottingham Ind Inc		VT	Yes	No
10436	Oak Tree Assur Ltd		VT	Yes	No
10438	Ashmont Ins Co Inc		VT	Yes	No
10439	Penwald Ins Co		VT	Yes	No
10440	Phoenix Assoc Ins Co		VT	Yes	No
10444	Assured Ins Co		VT	Yes	No
10445	Christiana Ins LLC		VT	Yes	No
10446	Primera Ins Co		VT	Yes	No
10447	Progress Ins Co Grp		VT	Yes	No
10449	Property & Cas Ins Ltd Us		VT	Yes	No
10452	Relentless Ins Inc		VT	Yes	No
10453	Resort Hotel Ins Co		VT	No	No
10455	Professional Consultants Ins Co		VT	No	No
10457	Prolex Intl Assur Co		VT	Yes	No
10458	Protectors Ins Co Of VT		VT	Yes	No
10463	Sari Ins Co Inc		VT	Yes	No
10469	Santa Fe Pacific Ins Co		VT	Yes	No
10470	Shenandoah Ins Inc		VT	Yes	No
10471	Skanska Assur Inc		VT	Yes	No
10473	Snowdin Ins Co		VT	Yes	No
10474	Specialty Transportation Ins Co Inc		VT	No	No
10476	STICO Mut Ins Co RRG		VT	No	No
10478	Sooner Ins Co		VT	Yes	No
10479	Springview Cas Co		VT	Yes	No
10484	Sunrise Ins Co		VT	Yes	No
10486	Tall Tree Ins Co		VT	Yes	No
10488	Toyota Motor Ins Corp Of VT		VT	Yes	No
10491	Titania Ins Co Of Amer		VT	Yes	No
10493	Transfin Ins Ltd		VT	Yes	No
10494	Trenton Liberty Ins Co		VT	Yes	No
10501	Veritas Ins Corp		VT	Yes	No
10503	Tru VT Inc		VT	Yes	No
10506	United Valley Ins Co		VT	Yes	No
10507	University Ins Co Of VT		VT	Yes	No
10508	Ver Bes Ins Co		VT	Yes	No
10511	Vermont Gen Ins Co		VT	Yes	No
10512	Vermont Reserve Ins Co		VT	Yes	No
10513	Westel Ins Co		VT	Yes	No
10515	Western Range Ins Co		VT	Yes	No
10516	Xavier Ins Co		VT	Yes	No
10524	Minnetonka Ins Co		VT	Yes	No
10526	Renaissance Ins Co		VT	Yes	No
10527	Saint George Ins Co		VT	Yes	No
10530	Somerset Montpelier Ins Co		VT	Yes	No
10531	Three Rivers Ins Co		VT	Yes	No
10532	Astro II Inc		VT	Yes	No
10534	Superior Guar Ins Co	471	VT	Yes	No
10536	American Ridge Ins Co		VT	Yes	No
10538	American Triumvirate Ins Co		VT	Yes	No
10541	Agrinational Ins Co		VT	Yes	No
10544	Amexco Ins Co		VT	Yes	No
10546	Ancon Ins Co Inc		VT	Yes	No
10547	Beryl Amer Corp		VT	Yes	No
10548	Beverly Ind Ltd		VT	Yes	No
10549	Blue Spirit Ins Co		VT	Yes	No
10552	Burlington Natl Ins Co		VT	Yes	No
10554	Cabot Ins Co Ltd VT		VT	Yes	No
10556	Central Fidelity Ins Co		VT	Yes	No
10559	Bryn Mawr Assur Corp		VT	Yes	No
10560	Burr Ridge Ins Co		VT	Yes	No
10561	Catholic Relief Ins Co Of Amer		VT	Yes	No

10563	Caritas Ins Co Ltd		VT	Yes	No
10564	Royal Ambassador		VT	Yes	No
10565	Child Dimensions Ins Co		VT	Yes	No
10566	Childrens Ins Co		VT	Yes	No
10569	Home Serv Title Reins Co		VT	Yes	No
10571	Conven Petro Ins Co		VT	Yes	No
10572	Citicorp Ins USA Inc	41	VT	Yes	No
10574	Colonnade VT Ins Co		VT	Yes	No
10576	Contractors Cas Co		VT	Yes	No
10579	Defender Ind Ltd		VT	Yes	No
10581	Environmental Serv Ins Co		VT	Yes	No
10582	Equipment Ins Co		VT	Yes	No
10584	DSR Ins Inc		VT	Yes	No
10585	Elm Ins Co		VT	Yes	No
10586	EFH VT Ins Co		VT	Yes	No
10587	Equinox Ins Co		VT	Yes	No
10589	Equitable Cas Ins CoCe Co		VT	Yes	No
10593	Garden Ins Co Of VT		VT	Yes	No
10594	Gencon Ins Co Of VT		VT	Yes	No
10597	First Charter Ins Co		VT	Yes	No
10599	Freedom Ins Co	1324	VT	Yes	No
10601	Gateway Rivers Ins Co		VT	Yes	No
10602	General Amer Ins Co		VT	Yes	No
10603	Grant Assur Corp		VT	Yes	No
10604	Greenway Ins Co Of VT		VT	Yes	No
10605	GTE Reins Co Ltd		VT	Yes	No
10608	HC Ins Co		VT	Yes	No
10609	Hillbrook Ins Co Inc		VT	Yes	No
10610	Celwood Ins Co		VT	Yes	No
10611	Homeport Ins Co		VT	Yes	No
10612	GTI Ins Co Inc		VT	Yes	No
10613	Texas Hlth Resources Cas Co		VT	Yes	No
10615	Vandalia Ins Co		VT	No	No
10617	SCH Ins Co		VT	Yes	No
10621	Howmet Ins Co Inc		VT	Yes	No
10623	IMC Global Ins		VT	Yes	No
10624	Industries Ins Inc		VT	Yes	No
10625	International Atlantins Ins Co		VT	Yes	No
10631	Invatection Ins Co		VT	Yes	No
10632	Armor Assur Co		VT	Yes	No
10633	Lincoln Ind Co		VT	Yes	No
10635	Miami Valley Ins Co		VT	Yes	No
10639	Attorneys Liab Assur Society Inc RRG		VT	Yes	No
10697	MCIC VT Inc RRG		VT	Yes	No
10712	United Home Ins Co A RRG		VT	Yes	No
10803	Columbia Natl RRG Inc		VT	Yes	No
10808	Cassatt RRG Inc		VT	Yes	No
10842	Franklin Cas Ins Co RRG		VT	Yes	No
10903	American Excess Ins Exch RRG		VT	Yes	No
10934	Physicians Reimbursement RRG		VT	Yes	No
10950	Mountain Ridge Ins Co	3548	VT	Yes	No
11021	Indiana Old Natl Ins Co		VT	Yes	No
11192	Vermont Western Assur Inc		VT	Yes	No
11206	Housing Enterprise Ins Co Inc	4359	VT	Yes	No
11259	Community Hospital RRG		VT	No	No
11265	Regis Ins Grp Inc		VT	Yes	No
11267	Security Amer RRG Inc		VT	No	No
11268	ICI Mut Ins Co RRG		VT	No	No
11269	Beverage Retailers Ins Co RRG		VT	No	No
11272	International Industrial Ind Co		VT	Yes	No
11276	National Ins & Ind Co		VT	Yes	No
11278	First Medical Ins Co RRG		VT	Yes	No
11279	Great Plains Ins Co	471	VT	Yes	No
11280	Global Professional Assur Co		VT	Yes	No
11285	AZ MONT Ins CO		VT	Yes	No
11286	Chemont Ins Co		VT	Yes	No
11288	Colchester Ins Co		VT	Yes	No
11289	Prism Assur Ltd		VT	Yes	No
11291	Exchange Ind Co		VT	Yes	No
11292	Bank of Amer Reins Corp		VT	Yes	No
11293	UT Ins (VT) Inc		VT	Yes	No
11296	Alabaster Assur Co Ltd		VT	Yes	No
11297	Dere Ins Co		VT	Yes	No
11298	CW Reins Co		VT	Yes	No
11299	LTC Mut Risk & Ind Co		VT	No	No

11300	Northrop Grumman Risk Management, Inc.		VT	Yes	No
11301	Cross Country Ins Co		VT	Yes	No
11302	Wheeler Ins Ltd		VT	Yes	No
11303	Mollyanna Co Inc		VT	Yes	No
11308	International Security Ins Co		VT	Yes	No
11311	Third Capital Mortgage Ins Co		VT	Yes	No
11313	Noble Assur Co		VT	Yes	No
11315	Citibank Mortgage Reins Inc	41	VT	Yes	No
11317	LeadVille Ins Co		VT	Yes	No
11318	First Beacon Ins Co		VT	Yes	No
11322	M&T Mortgage Reins Co Inc		VT	Yes	No
11323	Captive Housing Ins Co Ltd		VT	No	No
11324	Global Ind Assur Co		VT	Yes	No
11326	HMC Reins Co		VT	Yes	No
11327	OffShore Marine Ind Co		VT	Yes	No
11329	AAA Mid Atlantic Reins Co		VT	Yes	No
11331	Joliet Mortgage Reins Co		VT	Yes	No
11333	Church Ins Co of VT		VT	Yes	No
11334	MGIC Reins Corp of VT		VT	No	No
11335	Cornerstone Title Ins Co		VT	Yes	No
11336	Whitman Ins Co Ltd		VT	Yes	No
11337	Capricorn Ins Co		VT	Yes	No
11338	Agrisurance Inc		VT	No	No
11341	Lawyers Reins Co	3320	VT	Yes	Yes
11342	OS Reins Co		VT	Yes	No
11344	Banc One Ins Co	9	VT	Yes	No
11345	North Star Mortgage Guar Reins Co	471	VT	Yes	No
11346	County Reins Co		VT	No	No
11350	Public Utility Mut Ins Co RRG		VT	No	No
11351	New England Mortage Ins Co		VT	No	No
11353	Principal Mortgage Reins Co	41	VT	Yes	No
11357	Komatsu Amer Ins Corp		VT	Yes	No
11358	Capital One Reinsurance Company		VT	Yes	No
11359	American Assur Corp		VT	Yes	No
11360	Mortgage Serv Captive Re Inc		VT	Yes	No
11364	Vine Court Assurance Incorporated		VT	Yes	No
11365	Sponsored Captive Re Inc	4011	VT	Yes	No
11366	Carlisle Ins Co		VT	Yes	No
11368	Beacon Ins Co		VT	Yes	No
11369	Fidalgo Ins Co		VT	Yes	No
11372	GK Ins Co		VT	Yes	No
11373	Promedica Ind Corp		VT	Yes	No
11374	Association Mortgage Reinsurance Inc.		VT	Yes	No
11376	Marion Ins Co Inc		VT	Yes	No
11377	Aero Assur Ltd		VT	Yes	No
11378	Capital Federal Mortgage Reins Co		VT	Yes	No
11379	John Hancock Ins Co of VT		VT	No	No
11381	Standard Trane Ins Co		VT	Yes	No
11382	Duxford Title Reins Co		VT	Yes	No
11384	Natl Alliance of Nonprofits for Ins		VT	No	No
11385	Charter One Reins Inc		VT	Yes	No
11386	Pearl City Ins Co		VT	Yes	No
11388	Teal Lake Ins Co		VT	Yes	No
11389	Steward Ins Co		VT	Yes	No
11390	Circletree Ins Co		VT	Yes	No
11391	Global Risk Ins Co		VT	Yes	No
11392	PPH Natl Ins Co		VT	Yes	No
11396	Pearl St Ins Co Inc	3891	VT	Yes	No
11397	Enterprise Protection Ins Co		VT	Yes	No
11403	DelHaize Ins Co		VT	Yes	No
11405	Keystone Ind Co Ltd		VT	Yes	No
11407	Intersource Ins Co		VT	Yes	No
11408	Expeditors Assur of VT Inc		VT	Yes	No
11409	Queen City Assur Inc		VT	Yes	No
11412	Yorktown Assur Corp		VT	Yes	No
11413	Savage Ins Ltd		VT	Yes	No
11415	Spinnaker Ins Co		VT	Yes	No
11416	Astec Ins Co		VT	Yes	No
11418	Woodlands Ins Co Inc		VT	Yes	No
11419	Pallas N Amer Ins Co Inc		VT	Yes	No
11422	Hills Ins Co Inc		VT	Yes	No
11423	Rohm & Haas VT Co		VT	Yes	No
11424	Gannett VT Ins Inc		VT	Yes	No
11427	Trimco Ins Co		VT	Yes	No
11430	National Grid Ins Co VT		VT	Yes	No

11431	Saint Gobain Ins Ltd		VT	Yes	No
11432	Mountainview Ins Co Ltd		VT	Yes	No
11434	Power Consultants Ins Co		VT	Yes	No
11435	HCI Inc	812	VT	Yes	Yes
11437	IXP LLC		VT	Yes	No
11449	Specialty Trade Ins Co		VT	No	No
11456	Crownway Ins Co		VT	Yes	No
11458	Group Mortgage Reins Co	150	VT	Yes	No
11461	Catamount Ind Ltd		VT	No	No
11462	Mountain Prairie Ins Co Inc		VT	Yes	No
11463	United Guar Partners Ins Co		VT	No	No
11464	Western Re Inc		VT	Yes	No
11465	University S FL Hlth Science Ins Co		VT	Yes	No
11466	AAMBG Reins Inc		VT	Yes	No
11467	Marquette Title Ins Co		VT	Yes	No
11468	University FL Hlthcare Ed Ins Co		VT	Yes	No
11470	M & I Mortgage Reins Corp		VT	Yes	No
11472	Radian Mortgage Reins Co	766	VT	Yes	No
11473	First Southeast Reins Co Inc		VT	Yes	No
11475	Regions Reins Corp		VT	Yes	No
11476	BB&T Mortgage Reins		VT	Yes	No
11480	Provident Recip Ins Exch		VT	No	No
11481	Fifth Third Mortgage Ins Reins Co		VT	Yes	No
11482	Danaher Ins Co		VT	Yes	No
11483	Irwin Reins Corp		VT	Yes	No
11484	PI Ins Co		VT	Yes	No
11486	Golden Pacific Ins Co	471	VT	Yes	No
11489	Glenharney Ins co		VT	Yes	No
11490	NFL Players Ann & Ins Co		VT	Yes	No
11491	Security Title Ins Co		VT	Yes	No
11514	Physicians Professional Liab RRG		VT	Yes	No
11528	Consortium RRG		VT	Yes	No
11531	CHC Cas RRG	1137	VT	Yes	No
11536	Community Hlth Alliance Recip RRG		VT	No	No
11547	Mountain Laurel RRG Inc		VT	Yes	No
11548	United Central PA RRG		VT	Yes	No
11562	National Union Fire Ins Co of VT		VT	No	No
11565	Multimedia Ins Co		VT	Yes	No
11566	Buena Vista Ins Co		VT	Yes	No
11567	FCCC Select Inc		VT	Yes	No
11571	Bedins VT Ind		VT	Yes	No
11575	Pace RRG Inc		VT	No	No
11586	American Eagle Ins Co RRG		VT	No	No
11587	Pelican Ins RRG		VT	No	No
11608	Aes Global Ins co		VT	Yes	No
11609	Alameda Ins Co		VT	Yes	No
11610	One Mortgage Partners Corp		VT	Yes	No
11611	Iron Mountain Assur Corp		VT	Yes	No
11612	NRI Ins Co		VT	Yes	No
11620	Midwest Ind Inc		VT	Yes	No
11625	College Ins Co		VT	No	No
11627	FNF Title Reins Co		VT	No	No
11628	Epic Ins Co		VT	Yes	No
11629	Medical Assistance Ins Co Inc		VT	Yes	No
11632	YKK Ins Co of Amer		VT	Yes	No
11635	Philmont Ins Co		VT	Yes	No
11636	Sunrise Senior Living Ins Inc		VT	Yes	No
11640	Western Prop & Cas Ins Co		VT	Yes	No
11641	Agricultural Ind Ins Co		VT	Yes	No
11643	New England Manufacturers Ins Corp		VT	Yes	No
11644	Second Street Ins Corp		VT	Yes	No
11648	Charles River Ins Co	144	VT	Yes	Yes
11651	Northgroup Sponsored Captive Ins		VT	No	No
11652	Pennsylvania Acacia Ins Co Ltd		VT	Yes	No
11654	Citadel Assur Co		VT	Yes	No
11659	DHI Ins Inc		VT	Yes	No
11661	Neighborhood Ins Inc		VT	Yes	No
11662	Giant Ins Co		VT	Yes	No
11666	Noonan Companies Ind Ltd		VT	Yes	No
11676	Cruden Bay RRG Inc		VT	Yes	No
11682	Wellspan RRG		VT	Yes	No
11688	St Lukes Hlth Ntwrk Ins Co Recip RRG		VT	Yes	No
11692	Indiana Hlthcare Recip RRG		VT	No	No
11693	Chesapeake Title Reins Co Inc		VT	Yes	No
11796	Yellowstone Ins Exch RRG		VT	No	No

11802	Warren RRG Inc		VT	Yes	No
11803	Lake Street RRG Inc		VT	Yes	No
11808	Schuykill Crossing Recip RRG		VT	Yes	No
11839	Circle Star Ins Co RRG		VT	Yes	No
11846	Peace Church RRG Inc		VT	No	No
11848	Customer Asset Protection Co		VT	No	No
11864	Comcare Pro Ins Recip RRG		VT	No	No
11868	Bishops Plan Ins Co		VT	No	No
11877	ADP Ind Inc		VT	Yes	No
11879	AHT Reins Inc		VT	Yes	No
11880	Alcott Ind Co		VT	Yes	No
11882	ATK Ins Co		VT	Yes	No
11883	Automobile Dealers Ins Co Inc		VT	No	No
11884	SP Assur VT Co Ltd		VT	Yes	No
11891	Claridge Ins Co		VT	Yes	No
11893	Construction Liab Ins Co		VT	Yes	No
11895	CSC VT Inc		VT	Yes	No
11896	Curtis Ins Co		VT	Yes	No
11897	Fireside Inn & Suites Ins Co		VT	Yes	No
11898	FNL Ins Co		VT	Yes	No
11899	Fortuna Assur Co		VT	Yes	No
11901	FS Preferred Ins Co		VT	Yes	No
11902	Gambro Ins Co		VT	Yes	No
11905	Heinz Noble Inc		VT	Yes	No
11906	HHC Risk Serv Corp		VT	Yes	No
11909	IWIC Ins Co		VT	Yes	No
11910	Garret Mountain Ins Co		VT	Yes	No
11911	Maple Ins Inc		VT	Yes	No
11912	McCormick Ins Co Inc		VT	Yes	No
11913	Melville Reins Corp		VT	Yes	No
11917	MLB Burlington Assur Exch Society		VT	No	No
11919	MSK Ins US Inc		VT	Yes	No
11922	Oneida Ins Co		VT	Yes	No
11923	Park Assur Co		VT	Yes	No
11925	Pinewood Ins Co		VT	Yes	No
11926	Procurator Assur Inc		VT	Yes	No
11927	Saddle Brook Ins Co		VT	Yes	No
11928	Sardos Ins Co		VT	Yes	No
11929	Seymour Lake Ins Corp		VT	Yes	No
11933	Transcontinental Surety of VT Inc		VT	Yes	No
11934	Tricl USA Inc	4483	VT	Yes	No
11935	Unity Ins Inc		VT	Yes	No
11936	Westview Co		VT	Yes	No
11937	White Mountain Ins Co		VT	Yes	No
11941	Green Hills Ins Co RRG		VT	Yes	No
11942	Century Cas Co		VT	Yes	No
11948	Global Hawk Ins Co RRG		VT	No	No
11957	Housing Partnership Ins Exch		VT	No	No
11969	NSA RRG Inc		VT	No	No
11980	Pinnacle Consortium of Higher Ed RRG		VT	No	No
11998	Heartland Hlthcare Recip RRG		VT	No	No
12000	Geisinger Ins Corp RRG		VT	Yes	No
12016	Fredericksburg Professional Risk Exc		VT	Yes	No
12066	HSBC Reins USA Inc		VT	Yes	No
12169	New Life Ins Co		VT	Yes	No
12171	AmeriGuard RRG Inc		VT	Yes	No
12172	Claim Professionals Liab ins Co RRG		VT	No	No
12292	Affiliates Prop Recip	4681	VT	Yes	No
12308	Cimarron Ins Exch RRG		VT	No	No
12348	Pine Tree Ins a Recip RRG		VT	No	No
12470	PNC Re Inc		VT	Yes	No
12557	ACBG RRG Inc		VT	No	No
12560	Academic Physicians Ins Co		VT	Yes	No
12608	Professional Quality Liab Ins C		VT	Yes	No
12626	Blue Whale Re Ltd		VT	Yes	No
12640	AIHL Re LLC	501	VT	Yes	No
12643	INS Ins Inc		VT	Yes	No
12644	Hilton Ins Corp		VT	Yes	No
12646	RBC Mortgage Risk Assumption Inc		VT	Yes	No
12648	Broadstreet Ins Co		VT	Yes	No
12649	Agassiz Assur Co		VT	Yes	No
12650	Whirlpool Ins Co Ltd		VT	Yes	No
12651	RI Assur Inc		VT	Yes	No
12652	River Ridge Ins Co		VT	Yes	No
12654	American Ins Providers Inc		VT	Yes	No

12656	Hockey & Rink Protection Inc		VT	Yes	No
12657	CCL Ins Co		VT	Yes	No
12659	First Continental Serv Co		VT	Yes	No
12660	Collegiate Catalyst Fund LLC		VT	No	No
12662	Wabasha Ins Co		VT	Yes	No
12663	QMI Inc		VT	Yes	No
12664	White Eagle Assur Co		VT	Yes	No
12665	NJSEA Ins Co Inc		VT	Yes	No
12666	John Deere Ind Inc		VT	Yes	No
12668	Pedcor Ins Co		VT	Yes	No
12669	Emerald Mountain Ins Co		VT	Yes	No
12672	Finn Mac Cool Ins Co		VT	Yes	No
12673	Transit Reins Ltd		VT	No	No
12674	Greencrest Ins Co		VT	Yes	No
12675	MS Builders Ins Co		VT	No	No
12676	OSF Assur Co		VT	Yes	No
12677	Pacman Ins Inc		VT	Yes	No
12678	BBA Aviation Ins VT Inc		VT	Yes	No
12680	Boston Medical Center Ins Co Ltd VT		VT	Yes	No
12683	Liberty Sponsored Ins VT Inc		VT	No	No
12684	Lumerica Ins Co		VT	Yes	No
12685	Charter Partners Ins Co		VT	No	No
12686	Watch Hill Ins Co		VT	No	No
12687	Iron Horse Ins Co		VT	Yes	No
12689	Realty Assur LLC		VT	Yes	No
12690	Burnham Cas Ins Co		VT	Yes	No
12691	Tara Ins Global Ltd		VT	Yes	No
12692	Solaris Ind Ltd		VT	Yes	No
12693	Virtua Assur Inc		VT	Yes	No
12694	Beneva Ind Co		VT	Yes	No
12695	Standing Rock Ins Co		VT	Yes	No
12697	Superior Aerospace Ins Co		VT	Yes	No
12698	MHL Reins Ltd		VT	Yes	No
12699	CFP Ins Inc		VT	Yes	No
12703	Community Care Ind Co		VT	Yes	No
12704	JE Dunn VT Assur LLC		VT	Yes	No
12705	Stonebridge Reins Co		VT	Yes	No
12706	Millhouse Ins Co		VT	Yes	No
12708	Red Maple Ins Co	4483	VT	Yes	No
12709	International Exch Travel Ins Co		VT	Yes	No
12710	Standard Ind Captive Ins Co		VT	Yes	No
12711	RCCS Ins Co		VT	No	No
12712	MEHC Ins Serv Ltd		VT	Yes	No
12713	Olympic Cas Ins Co		VT	Yes	No
12714	DCP Ins Inc		VT	No	No
12715	Realty Coverage LLC		VT	Yes	No
12716	National Prop Protection Co		VT	Yes	No
12717	American Property Protection Co		VT	Yes	No
12719	Energy Risk Assur Co		VT	Yes	No
12720	HM Captive Ins Co		VT	No	No
12722	Promutual Solutions Ins Co		VT	No	No
12723	New York Shipping Assur Assn Inc		VT	Yes	No
12724	MA Prime Assur LLC		VT	Yes	No
12752	Westminster Insurance Company		VT	Yes	No
12846	Cap Re of VT LLC		VT	Yes	No
12847	TVC Ins Inc		VT	Yes	No
12848	Systemsplus Mut Ins Co		VT	No	No
12852	Ameriprise Captive Ins Co		VT	Yes	No
12853	Pedcor Assur Co		VT	Yes	No
12854	Oak Prop & Cas LLC		VT	No	No
12855	Champlain Life Reins Co		VT	Yes	No
12856	United Ins Co USA Inc		VT	No	No
12857	Catholic Ind Ins Co		VT	Yes	No
12859	Waterrock Ins LLC		VT	Yes	No
12861	Edgewater Ind Co		VT	Yes	No
12862	Ceres Reins Inc		VT	No	No
12863	LHCA Re I Inc		VT	Yes	No
12864	LHCA Re II Inc		VT	Yes	No
12865	Principal Reins Co of VT		VT	Yes	No
12918	System & Affil Members Recip RRG		VT	No	No
12923	US Rail Ins Co A RRG		VT	No	No
12928	Vernason Ins Co of VT		VT	Yes	No
12929	East End Ins Ltd		VT	Yes	No
12930	Old Colony State Ins Co		VT	Yes	No
12931	Allied N Amer Ins Co		VT	Yes	No

12932	USP Assur Co		VT	Yes	No
12933	Bedford Physicians RRG Inc		VT	Yes	No
12934	Academic Medical Professionals Ins E		VT	No	No
12989	Springboks Ins Ltd		VT	Yes	No
12990	MJ Risk Solutions Inc		VT	Yes	No
12991	Tompkins Risk Managers Inc		VT	Yes	No
12992	Global Confectionery Ins Co		VT	Yes	No
12993	Penn Plaza Insurance Company		VT	Yes	No
13031	Northwind Reins Co	565	VT	Yes	No
13051	Sun Life Fin US Reins Co	549	VT	Yes	No
13052	Trowel Trades Industry Ins Co		VT	No	No
13053	Flagstar Reins Co		VT	Yes	No
13054	Kimco Ins Co Inc		VT	Yes	No
13055	FRMT Ltd		VT	No	No
13057	Hamden Assurance RRG Inc		VT	Yes	No
13058	KGI Captive Ins Co		VT	Yes	No
13059	North Shore LIJ Physicians Ins Co RR		VT	Yes	No
13069	Pacific Alliance Reins Co of VT	709	VT	Yes	No
13075	Aviva Re USA Inc	44	VT	Yes	No
13092	Metlife Reins Co of VT	241	VT	Yes	No
13093	River Lake Ins Co V	4011	VT	Yes	No
13094	NC3 Inc		VT	Yes	No
13096	Pine Falls Re Inc		VT	Yes	No
13097	Marias Falls Ins Co Ltd		VT	Yes	No
13110	Vermont Accident Ins Co Inc	45	VT	Yes	Yes
13136	Duxford Ins Co LLC		VT	Yes	No
13138	Thermo Fisher Ins Co		VT	Yes	No
13154	Winthrop Physicians Recip RRG		VT	Yes	No
13155	Rivoli Reins Co		VT	Yes	No
13156	Green Frog Ins Co		VT	Yes	No
13157	NYXP LLC		VT	Yes	No
13182	WB Re Ltd		VT	Yes	No
13195	Orcas Ltd VT Branch		VT	Yes	No
13197	Equity Lifestyle Ind Co LLC		VT	Yes	No
13198	EFE Global Ins Co		VT	Yes	No
13199	Guidestone Risk Mgmt Co		VT	Yes	No
13201	Rock River Ins Co LLC		VT	Yes	No
13202	Rialto Re I Inc		VT	Yes	No
13574	SE VT Ltd		VT	Yes	No
13575	Montgomery Re Inc		VT	Yes	No
13576	American Safety Assur VT Inc		VT	No	No
13612	Prospect Mortgage Ins LLC		VT	Yes	No
13613	College RRG Inc		VT	No	No
13614	Sterling Centennial Ins Corp		VT	Yes	No
13615	Guaranty Direct Ins Co Ltd		VT	Yes	No
13616	Morgan Stanley Merchant Banking Ins		VT	Yes	No
13618	River Lake Ins Co VII	4011	VT	Yes	No
13644	Oasis Recip RRG		VT	No	No
13654	Firstmerit Risk Mgmt Inc		VT	Yes	No
13655	Crystal Run Recip RRG		VT	Yes	No
13656	Saint Marys Ind Co LLC		VT	Yes	No
13657	CMH Ins Co LLC		VT	Yes	No
13658	Saint Francis Ind Co LLC		VT	Yes	No
13659	MG Reins Ltd		VT	Yes	No
13677	Affiliates Ins Recip a RRG	4681	VT	Yes	No
13678	ESB Captive Ins Co LLC		VT	Yes	No
13679	LCP Ins Serv Inc		VT	Yes	No
13680	One Belmont Ins Co		VT	Yes	No
13681	Edradour Ins Co		VT	Yes	No
13693	Lincoln Reins Co of VT I	20	VT	Yes	No
13708	Blue Ridge Ind Co LLC		VT	Yes	No
13709	Inovacap LLC		VT	Yes	No
13710	Centra Hlth Ind Co LLC		VT	Yes	No
13711	AFP Risk Inc		VT	No	No
13712	MLIC Re I Inc		VT	Yes	No
13713	ECH 2101 Ltd		VT	Yes	No
13715	White River Life Reins Co		VT	Yes	No
13716	First Gen Ins Co Inc		VT	Yes	No
13717	Caresource Ins LLC		VT	Yes	No
13718	Keycorp Ins Co LLC		VT	Yes	No
13719	Atrium Reins Corp		VT	Yes	No
13727	Maple Red Ins Co		VT	Yes	No
13728	Meleer Ins Co		VT	Yes	No
13729	ABR Ins Co		VT	Yes	No
13731	Mack Ave Ins Co Inc		VT	Yes	No

13732	Sterling Re Inc		VT	Yes	No
14095	Granite Mut Ins Co	234	VT	Yes	No
18686	Co Operative Ins Co		VT	No	No
20680	Green Mountain Ins Co Inc	45	VT	Yes	Yes
22241	Medmarc Cas Ins Co	1113	VT	Yes	Yes
25448	American Safety RRG Inc	1346	VT	Yes	No
25852	New England Guar Ins Co Inc	195	VT	Yes	Yes
25860	Union Mut Fire Ins Co	195	VT	Yes	Yes
25992	Northern Security Ins Co Inc	234	VT	Yes	No
26018	Vermont Mut Ins Co	234	VT	Yes	No
26797	Housing Authority RRG Inc	4359	VT	Yes	No
27905	NLC Mut Ins Co		VT	No	No
32089	Medmarc Mut Ins Co	1113	VT	Yes	Yes
32336	Title Reins Co	340	VT	Yes	No
36978	Constance Ins Co		VT	Yes	No
38172	National Guar Ins Co of VT		VT	Yes	No
38466	Evergreen USA RRG Inc		VT	No	No
44075	States Self Insurers RRG		VT	No	No
44105	Ophthalmic Mut Ins Co RRG		VT	No	No
44237	Mental Hlth RRG		VT	No	No
53279	Delta Dental Plan of VT		VT	No	No
53295	BCBS of VT		VT	No	No
60085	Wake Robin Corp		VT	No	No
65021	Stonebridge Life Ins Co	468	VT	Yes	No
66680	National Life Ins Co	634	VT	Yes	No
95696	The Vt Hlth Plan LLC		VT	Yes	No
97381	US Bancorp Ins Co		VT	Yes	No
10175	Cascade Natl Ins Co		WA	No	No
10220	Commonwealth Ins Co Of Amer	158	WA	Yes	No
10942	Western Professional Ins Co	464	WA	Yes	Yes
11100	Safeco Surplus Lines Ins Co	111	WA	Yes	No
11232	Enumclaw Prop & Cas Ins Co	333	WA	Yes	Yes
12151	Arcadian Hlth Plan Inc	3681	WA	Yes	No
12239	Timber Products Manufacturers Trust		WA	No	No
12609	Washington State Auto Dealers Ins Tr		WA	No	No
12621	Washington Employers Trust		WA	No	No
12909	Puget Sound Hlth Partners		WA	Yes	No
14761	Mutual Of Enumclaw Ins Co	333	WA	Yes	Yes
18805	Pemco Ins Co	157	WA	Yes	Yes
21644	Farmers Ins Co Of WA	212	WA	Yes	No
22101	Grange Ins Assn	83	WA	Yes	Yes
22128	Rocky Mountain Fire & Cas Co	83	WA	Yes	Yes
24341	Pemco Mut Ins Co	157	WA	Yes	Yes
24724	First Natl Ins Co Of Amer	111	WA	Yes	No
24732	General Ins Co Of Amer	111	WA	Yes	No
24740	Safeco Ins Co Of Amer	111	WA	Yes	No
25747	Unigard Ins Co	796	WA	Yes	No
25798	Unigard Ind Co	796	WA	Yes	No
29360	Fraternal Benefical Assn		WA	No	No
32417	Northwest Dentists Ins Co	1313	WA	Yes	No
37206	Contractors Bonding & Ins Co		WA	Yes	No
39004	National Merit Ins Co	215	WA	Yes	No
40738	Physicians Ins A Mut Co	464	WA	Yes	Yes
41580	Red Shield Ins Co	3485	WA	Yes	No
42510	Washington Cas Co	1154	WA	Yes	Yes
47047	Columbia United Providers Inc		WA	Yes	No
47049	Community Hlth Plan of WA		WA	Yes	No
47050	Willamette Dental of WA Inc	3503	WA	Yes	No
47055	Group Hlth Options Inc	1185	WA	Yes	Yes
47060	Aetna Hlth Inc WA Corp	1	WA	Yes	No
47100	Pacific Visioncare WA Inc		WA	No	No
47317	Vision Serv Plan	1189	WA	Yes	No
47341	Washington Dental Serv		WA	No	No
47350	Asuris NW Hlth	1207	WA	Yes	No
47490	Dental Hlth Serv		WA	Yes	No
47570	Premera Blue Cross	962	WA	Yes	No
48038	Pacificare of WA Inc	707	WA	Yes	No
50962	Mason Cnty Title Ins Co		WA	No	No
50970	Pacific NW Title Ins Co Inc	70	WA	Yes	No
52633	LifeWise Hlth Plan of WA	962	WA	Yes	No
53872	KPS Hlth Plans	1185	WA	Yes	Yes
53902	Regence BlueShield	1207	WA	Yes	No
63177	Farmers New World Life Ins Co	212	WA	Yes	No
65105	Lifewise Hlth Plan of AZ Inc	962	WA	Yes	No
67059	North Coast Life Ins Co		WA	Yes	No

67482	Great Republic Life Ins Co	747	WA	Yes	No
68608	Symetra Life Ins Co	1129	WA	Yes	No
71803	Pemco Life Ins Co	157	WA	Yes	Yes
77925	Western United Life Assur Co		WA	Yes	No
78879	Commencement Bay Life Ins Co	1207	WA	Yes	No
84514	Industrial Alliance Pacific Ins & Fi	315	WA	Yes	No
90581	Symetra Natl Life Ins Co	1129	WA	Yes	No
94188	Lifewise Assur Co	962	WA	Yes	No
95672	Group Hlth Coop	1185	WA	Yes	Yes
96270	Molina Hlthcare of WA Inc	1531	WA	Yes	No
10130	SU Ins Co		WI	Yes	No
10159	WPS Hlth Plan Inc	68	WI	Yes	Yes
10194	Artisan & Truckers Cas Co	155	WI	Yes	No
10239	Secura Supreme Ins Co	96	WI	Yes	Yes
10247	MGIC Reins Corp of WI	105	WI	Yes	No
10252	MGIC Residential Reins Corp	105	WI	Yes	No
10327	Local Government Prop Ins Fund		WI	No	No
10328	Capitol Specialty Ins Corp	501	WI	Yes	No
10472	Capitol Ind Corp	501	WI	Yes	No
10666	MGIC Mortgage Reins Corp	105	WI	Yes	No
10682	MGIC Credit Assur Corp	105	WI	Yes	No
10689	Manitowoc Mut Ins Co		WI	No	No
10719	Farmington Mut Ins Co		WI	No	No
10723	Nationwide Assur Co	140	WI	Yes	Yes
10756	Community Care Hlth Plan Inc		WI	Yes	No
10831	MT Morris Mut Ins Co		WI	No	No
10924	Little Black Mut Ins Co		WI	No	No
10989	Ellington Mut Ins Co		WI	No	No
10992	CMG Mortgage Reins Co	306	WI	Yes	No
11036	Mcmillan Warner Mut Ins Co		WI	No	No
11116	Wisconsin Auto & Truck Dealers Ins		WI	Yes	No
11137	Network Hlth Ins Corp	2678	WI	Yes	No
11250	Community Ins Corp	3138	WI	Yes	Yes
11270	All Star Mut Ins Co		WI	No	No
11387	Forward Mut Ins Co		WI	No	No
11425	Yorkville & Mt Pleasant Mut Ins Co		WI	No	No
11527	League of WI Municipalities Mut Ins		WI	No	No
11607	West Central Mut Ins Co		WI	No	No
11617	Wausau Stettin Mut Ins Co		WI	No	No
11623	Waukesha Cnty Mut Ins Co		WI	No	No
11638	Washington Town Mut Ins Co		WI	No	No
11653	Tri Cnty Mut Town Ins Co		WI	No	No
11655	Trade Lake Mut Ins Co		WI	No	No
11658	Theresa Mut Ins Co		WI	No	No
11695	Independent Care Hlth Plan	119	WI	Yes	No
11713	Sugar Creek Mut Ins Co		WI	No	No
11717	Stockholm Town Mut Ins Co		WI	No	No
11718	Spring Grove Mut Ins Co		WI	No	No
11719	Southeast Mut Ins Co		WI	No	No
11721	South Central Mut Ins Co		WI	No	No
11722	Shelby Farmer's Mut Ins Co		WI	No	No
11723	Seneca Sigel Mut Ins Co		WI	No	No
11724	Rosendale Mut Ins Co		WI	No	No
11725	River Falls Mut Ins Co		WI	No	No
11726	Reedsburg Westfield Mut Ins Co		WI	No	No
11727	Racine Cnty Mut Ins Co		WI	No	No
11728	Price Cnty Town Mut Ins Co		WI	No	No
11729	Pella Mut Ins Co		WI	No	No
11730	Paris Mut Fire Ins Co		WI	No	No
11731	Northern Finnish Mut Ins Co		WI	No	No
11732	Northeastern Mut Ins Co		WI	No	No
11733	Newark Mut Ins Co		WI	No	No
11734	New Hope Mut Ins Co		WI	No	No
11735	Mt Pleasant Perry Mut Ins Co		WI	No	No
11739	Middleton Ins Co		WI	No	No
11741	Merrimac-Lodi Mut Ins Co		WI	No	No
11742	Medina Mut Ins Co		WI	No	No
11743	Marcellon-Courtland-Springvale Mut Ins Co		WI	No	No
11744	Luck Mut Ins Co		WI	No	No
11748	Liberty Mut Fire Ins Co		WI	No	No
11749	Lebanon Clyman Mut Ins Co		WI	No	No
11750	La Prairie Mut Ins Co		WI	No	No
11751	Kenosha Cnty Mut Ins Co		WI	No	No
11752	Jamestown Mut Ins Co		WI	No	No
11753	Homestead Mut Ins Co		WI	No	No

11755	Holland Mut Fire Ins Co		WI	No	No
11756	Henrietta Greenwood & Union Mut Fire		WI	No	No
11757	Helenville Mut Ins Co		WI	No	No
11759	Green Cnty Mut Ins Co		WI	No	No
11760	Franklin Farmers Mut Ins Co		WI	No	No
11761	Fountain City Mut Ins Co		WI	No	No
11763	Flyway Mut Ins Co		WI	No	No
11764	Farmers Town Mut Ins Co		WI	No	No
11765	Fall Creek Mut Ins Co		WI	No	No
11766	Ettrick Mut Ins Co		WI	No	No
11767	Eagle Point Mut Ins Co		WI	No	No
11768	Dupont Mut Ins Co		WI	No	No
11769	Darlington Mut Ins Co		WI	No	No
11774	Columbus Mut Town Ins Co		WI	No	No
11776	Clarno Mut Ins Co		WI	No	No
11777	Calumet Equity Mut Ins Co		WI	No	No
11778	Caledonia Mut Fire Ins Co		WI	No	No
11779	Bristol Town Ins Co		WI	No	No
11780	Bloomington Farmers Mut Ins Co		WI	No	No
11781	Berry and Roxbury Mut Ins Co		WI	No	No
11782	Barron Mut Ins Co		WI	No	No
11783	Baraboo Farmers Mut Ins Co		WI	No	No
11784	Ashland Cnty Town Ins Co		WI	No	No
11785	Arlington Mut Fire Ins Co		WI	No	No
11826	Dental Com Ins Plan Inc		WI	No	No
11977	Northwestern Natl Ins Co Seg Accnt	143	WI	Yes	No
11991	National Cas Co	140	WI	Yes	Yes
12006	Districts Mut Ins		WI	No	No
12007	Abri Hlth Plan Inc		WI	Yes	No
12195	MercyCare HMO Inc	3595	WI	Yes	No
12248	Care WI Hlth Plan Inc		WI	Yes	No
12254	Omaha Ind Co	261	WI	Yes	Yes
12337	Partnership Hlth Plan Inc		WI	Yes	No
12352	Wyssta Ins Co Inc	3849	WI	Yes	Yes
12504	Ameriprise Ins Co	4	WI	Yes	No
12834	Trilogy Hlth Ins Inc		WI	Yes	No
12924	UCare WI Inc	4380	WI	Yes	Yes
12986	Integrity Prop & Cas Ins Co	267	WI	Yes	Yes
13137	Viking Ins Co Of WI	169	WI	Yes	Yes
13211	SeniorDent Dental Plan Inc		WI	No	No
13420	Badger Mut Ins Co		WI	No	No
13439	Partners Mut Ins Co		WI	No	No
13695	Mortgage Assur Corp		WI	Yes	No
13696	Requia Life Ins Corp		WI	No	No
13739	Childrens Comm Hlth Plan Inc		WI	Yes	No
13754	MIC Reins Corp of WI	105	WI	Yes	No
13755	MIC Reins Corp	105	WI	Yes	No
14036	Germantown Mut Ins Co		WI	No	No
14184	Acuity A Mut Ins Co		WI	No	No
14303	Integrity Mut Ins Co	267	WI	Yes	Yes
14354	Jewelers Mut Ins Co		WI	No	No
14550	Wea Prop & Cas Ins Co	2758	WI	Yes	No
14591	Milwaukee Ins Co	4675	WI	Yes	No
15091	Rural Mut Ins Co		WI	No	No
15148	Sheboygan Falls Ins Co		WI	Yes	Yes
15261	Society Ins		WI	No	No
15350	West Bend Mut Ins Co	1243	WI	Yes	Yes
15393	Wisconsin Amer Mut Ins Co		WI	No	No
16470	MGIC Reins Corp	105	WI	Yes	No
18139	Peak Prop & Cas Ins Corp	169	WI	Yes	Yes
18708	Ambac Assur Corp	1248	WI	Yes	No
18740	MGIC Ind Corp	105	WI	Yes	No
18767	Church Mut Ins Co		WI	No	No
18821	General Cas Ins Co	796	WI	Yes	No
19178	Southern Guar Ins Co	796	WI	Yes	No
19275	American Family Mut Ins Co	473	WI	Yes	Yes
19283	American Standard Ins Co of WI	473	WI	Yes	Yes
19950	Wilson Mut Ins Co	291	WI	Yes	Yes
20346	Pacific Ind Co	38	WI	Yes	No
21164	Dairyland Ins Co	169	WI	Yes	Yes
21180	Sentry Select Ins Co	169	WI	Yes	Yes
21270	Transit Mut Ins Corp Of WI		WI	No	No
21458	Employers Ins of Wausau	111	WI	Yes	No
21727	Progressive Universal Ins Co	155	WI	Yes	No
21741	Esurance Ins Co of NJ	1129	WI	Yes	No

22020	Wisconsin Lawyers Mut Ins Co		WI	No	No
22543	Secura Ins A Mut Co	96	WI	Yes	Yes
22594	MGIC Assur Corp Gen Account	105	WI	Yes	No
22861	Southern Pilot Ins Co	796	WI	Yes	No
22888	Southern Fire & Cas Co	796	WI	Yes	No
23035	Liberty Mut Fire Ins Co	111	WI	Yes	No
23400	ProAssurance WI Ins CO	2698	WI	Yes	No
23434	Middlesex Ins Co	169	WI	Yes	Yes
23442	Patriot Gen Ins Co	169	WI	Yes	Yes
23914	Northwestern Natl Ins Co Milwaukee	143	WI	Yes	No
24414	General Cas Co Of WI	796	WI	Yes	No
24449	Regent Ins Co	796	WI	Yes	No
24503	Blue Ridge Ins Co	796	WI	Yes	No
24830	Cities & Villages Mut Ins Co		WI	No	No
24961	Everspan Fin Guar Corp	1248	WI	Yes	No
24988	Sentry Ins A Mut Co	169	WI	Yes	Yes
25453	Nationwide Ins Co Of Amer	140	WI	Yes	Yes
25712	Esurance Ins Co	1129	WI	Yes	No
25879	Fidelity & Guar Ins Underwriters Inc	3548	WI	Yes	No
26042	Wausau Underwriters Ins Co	111	WI	Yes	No
26069	Wausau Business Ins Co	111	WI	Yes	No
26425	Wausau Gen Ins Co	111	WI	Yes	No
26662	Milwaukee Cas Ins Co	2538	WI	Yes	No
26956	Wisconsin Cnty Mut Ins Corp	3138	WI	Yes	Yes
27022	Wisconsin Mut Ins Co		WI	No	No
27880	Wisconsin Municipal Mut Ins Co		WI	No	No
28460	Sentry Cas Co	169	WI	Yes	Yes
29068	IDS Prop Cas Ins Co	4	WI	Yes	No
29114	CMG Mortgage Assur Co	306	WI	Yes	No
29157	United WI Ins Co	572	WI	Yes	Yes
29793	Pacific Star Ins Co	4256	WI	Yes	No
29858	Mortgage Guar Ins Corp	105	WI	Yes	No
30155	National Ins Co Of WI Ins		WI	Yes	No
30260	Wisconsin Reins Corp	490	WI	Yes	Yes
30520	Policyholders Mut Ins Co		WI	No	No
31755	State Auto Ins Co Of WI	175	WI	Yes	Yes
31780	Maple Valley Mut Ins Co		WI	No	No
33405	Wisconsin Hlth Care Liab Ins Plan		WI	No	No
35246	Laurier Ind Co		WI	Yes	No
36919	Hawkeye Security Ins Co	111	WI	Yes	No
38156	Alpha Prop & Cas Ins Co	215	WI	Yes	No
38628	Progressive Northern Ins Co	155	WI	Yes	No
40185	Millers Classified Ins Co	855	WI	Yes	No
40266	CMG Mortgage Ins Co	306	WI	Yes	No
40444	Old Republic Surety Co	150	WI	Yes	No
40703	Unitrin Safeguard Ins Co	215	WI	Yes	No
40754	Blue Ridge Ind Co	796	WI	Yes	No
40967	St Paul Fire & Cas Ins Co	3548	WI	Yes	No
41335	United Natl Specialty Ins Co	920	WI	Yes	No
42650	OneBeacon Midwest Ins Co	1129	WI	Yes	No
42994	Progressive Classic Ins Co	155	WI	Yes	No
44725	1st Auto & Cas Ins Co	490	WI	Yes	Yes
52005	Vision Ins Plan of Amer Inc		WI	Yes	No
52036	FIRST COMMONWLTH LTD HLTH SERV CORP	429	WI	Yes	Yes
52041	AMERICAN DENTAL PLAN OF WI INC		WI	No	No
52613	Vision Care Ntwrk Ins Corp		WI	No	No
53139	Wisconsin Physicians Serv Ins Corp	68	WI	Yes	Yes
53465	Dental Protection Plan Inc		WI	No	No
54003	BCBS of WI	671	WI	Yes	No
54046	Delta Dental Plan of WI Inc	3849	WI	Yes	Yes
54682	Wisconsin Vision Serv Plan Inc	1189	WI	Yes	No
55450	Care Plus Dental Plans Inc		WI	No	No
56014	Thrivent Financial For Lutherans	2938	WI	Yes	Yes
56022	Catholic Family Life Ins		WI	No	No
56030	Catholic Knights		WI	No	No
56049	Employes Mut Benefit Assn		WI	No	No
56057	Equitable Reserve Assn		WI	No	No
56073	National Mut Benefit		WI	No	No
60067	Dean Hlth Ins Inc	1294	WI	Yes	No
60215	Mercycare Ins Co	3595	WI	Yes	No
60399	American Family Life Ins Co	473	WI	Yes	Yes
64149	EPIC Life Ins Co	68	WI	Yes	Yes
65080	John Alden Life Ins Co	19	WI	Yes	No
65781	Madison Natl Life Ins Co Inc	450	WI	Yes	No
66583	National Guardian Life Ins Co	1211	WI	Yes	Yes

67091	Northwestern Mut Life Ins Co	860	WI	Yes	Yes
68349	North Amer Ins Co	574	WI	Yes	No
68810	Sentry Life Ins Co	169	WI	Yes	Yes
69000	Northwestern Long Term Care Ins Co	860	WI	Yes	Yes
69477	Time Ins Co	19	WI	Yes	No
70580	Humanadental Ins Co	119	WI	Yes	No
70599	State Life Ins Fund		WI	No	No
71013	Bankers Reserve Life Ins Co Of WI	1295	WI	Yes	No
71099	Parker Centennial Assur Co	169	WI	Yes	Yes
72273	Wea Ins Corp	2758	WI	Yes	No
73288	Humana Ins Co	119	WI	Yes	No
79480	Midwest Security Life Ins Co	707	WI	Yes	No
88323	Southern Life & Hlth Ins Co	450	WI	Yes	No
91529	Unimerica Ins Co	707	WI	Yes	No
95101	Gundersen Lutheran Hlth Plan Inc		WI	Yes	No
95113	Direct Dental Serv Plan Inc		WI	No	No
95192	Group Hlth Coop of Eau Claire		WI	No	No
95232	Medica Hlth Plans of WI	1552	WI	Yes	No
95311	Group Hlth Coop of S Central WI		WI	No	No
95341	Physicians Plus Ins Corp		WI	Yes	No
95342	Humana WI Hlth Org Ins Corp	119	WI	Yes	No
95352	DentaQuest Dental Plan Of WI Inc	4512	WI	Yes	Yes
95693	Compcare Hlth Serv Ins Corp	671	WI	Yes	No
95710	UnitedHealthcare of WI Inc	707	WI	Yes	No
95737	Network Hlth Plan of WI Inc	2678	WI	Yes	No
95782	Medical Assoc Clinic Hlth Plan of WI		WI	Yes	No
95796	Unity Hlth Plans Ins Corp		WI	Yes	No
96156	Dean Hlth Plan Inc	1294	WI	Yes	No
96628	Health Tradition Hlth Plan		WI	Yes	No
96733	Eye Care of WI Ins Inc		WI	No	No
96822	Managed Hlth Serv Ins Corp	1295	WI	Yes	No
96881	Security Hlth Plan of WI Inc		WI	Yes	No
97179	American Medical Security Life Ins C	707	WI	Yes	No
97241	Settlers Life Ins Co	1211	WI	Yes	Yes
10904	Pan Handle Farmers Mut Ins Co Of WV		WV	No	No
10911	West Virginia Natl Auto Ins Co		WV	Yes	No
11003	Wva Ins Co		WV	No	No
11055	Peoples Mut Fire Ins Co		WV	No	No
11810	Unicare Hlth Plan of WV Inc	671	WV	Yes	No
11972	West Virginia Mut Ins Co		WV	No	No
12329	Delta Dental of W VA	2479	WV	Yes	No
12372	Brickstreet Mut Ins Co		WV	No	No
12611	Farmers & Mechanics Fire & Cas Ins I	4339	WV	Yes	Yes
12779	Mountaineer Freedom RRG Inc		WV	No	No
14281	Inland Mut Ins Co		WV	No	No
14656	Municipal Mut Ins Co		WV	No	No
15415	Safe Ins Co		WV	No	No
15431	West Virginia Farmers Mut Ins Assoc	35	WV	Yes	No
36315	Farmers Mech Mut Fire Ins Of WV	4339	WV	Yes	Yes
38504	First Surety Corp		WV	Yes	No
40070	Farmers Mut Ins Co		WV	No	No
54828	Mountain State BCBS Inc	812	WV	Yes	Yes
60016	THP Ins Co	1297	WV	Yes	Yes
63770	George Washington Life Ins Co	351	WV	Yes	No
95408	Carelink Hlth Plans Inc	1137	WV	Yes	No
95677	The Hlth Plan the Upper OH Valley In	1297	WV	Yes	Yes
11974	Founders Title Ins		WY	No	No
13686	360 Ins Co	4683	WY	Yes	Yes
29440	Mountain W Farm Bureau Mut Ins Co	4683	WY	Yes	Yes
53767	BCBS of WY		WY	No	No
95401	Winhealth Partners		WY	No	No