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Subsidized Housing for Senior Citizens under the Section 8 Program of
the United States Department of Housing and Urban Development

CONFIDENTIAL FACSIMILE TRANSMITTAL

Date: _____

To: _____

Fax #: _____

From: _____

Policy #: _____

Pages: _____

Memo:

Attached is documentation of the State of Connecticut Insurance Department's regulation regarding rating territories, stating that:

"When the center of a street, avenue, or public way serves as a dividing line between two statistical territories that are located in the same county but assigned to different tables: Assign to both sides of the street the rate table and statistical code for the lower rated statistical territory" and "Company manuals must contain a rule that states that if a street divides two rating territories or towns the rate used must be that of the lower of the two territories."

This is not a new regulation. Please note that the PERSONAL VEHICLE MANUAL EXCEPTION PAGES are dated © 1994, and the Insurance Commissioner's Bulletin PC-36 is dated December 20, 2000, with accompanying letter dated February 22, 2012. This documentation was provided by the Insurance Commissioner at our request because insurance companies were denying our elderly residents of Park Avenue, 06604 the required lower rate of Park Avenue, 06825.

Thank you for your prompt attention.

18. INCREASED LIMITS (Cont'd)

Rule 18.B. is replaced by the following:

B. Medical Payments Increased Limits

The following table contains the factors to be applied to the basic \$1,000 Medical Payments Coverage limit rate.

Limit	Factor
\$ 1,000	1.00
2,000	1.57
5,000	2.41
10,000	3.18
25,000	4.15
50,000	4.93
75,000	5.23
100,000	5.35

19. MISCELLANEOUS TYPES**C. Motorcycles, Mopeds, Motorscooters, Motorbikes, Go-Carts And Any Other Similar Motor Vehicles Not Used For Business Purposes****LIABILITY****Motorcycle Training Course Discount**

1. A 15% Motorcycle Training Course Discount applies to the Single Limit Liability (or Bodily Injury and Property Damage Liability) premiums for motorcycles, provided:
 - a. The principal operator of the motorcycle has a completion certificate, certifying that he or she has successfully completed a novice or advanced motorcycle training course offered by the Connecticut Department of Transportation.
 - b. For initial applications of the discount, the motorcycle training course was completed within one year prior to the application of the discount. For subsequent applications of the discount, the motorcycle training course must be completed within one year of the expiration of the current discount period.
2. This Discount Shall apply:
 - a. To a motorcycle's liability premium for a five year period following the initial application of the discount.
 - b. Only to the motorcycle principally operated by the insured with the course completion certificate.

c. Only once to each such motorcycle regardless of the number of operators with course completion certificates.

D. Snowmobiles and All-Terrain Vehicles

Section 3. of this rule is replaced by the following:

3. Medical Payments - \$1,000 limit only - Charge 200% of the Private Passenger base rate.

20. RATING TERRITORIES

This rule is replaced by the following:

The Connecticut Territory Pages contain the definitions of the territorial divisions into which Connecticut is divided and show for each territory the rate table number to be used on the State Rate Pages and the statistical code number to be used for statistical reporting purposes.

1. Connecticut Statistical Territories:
 - a. Connecticut is divided into statistical reporting territories that correspond to TOWNS as defined in the State of Connecticut Register and Manual. Each statistical territory is assigned an individual statistical code number.
 - b. Each statistical territory as outlined above, comprises all territory and places lying within the area enclosed by the outside boundaries of the corresponding TOWN named and identified. In many cases the area so defined includes a city of the same name and/or several smaller cities, towns, boroughs, villages or other places. The following provisions are applicable in this connection.
 - (1) Any city, town, borough, village or other place not specifically mentioned as included within a statistical territory which is inside the boundary of a statistical territory shall take the rate table and statistical code of that statistical territory.
 - (2) If a city, town, borough, village or other place extends into more than one statistical territory, assign the rate table and statistical code based on the TOWN where the auto is garaged.

20. RATING TERRITORIES (Cont'd)

- (3) When the center of a street, avenue or public way serves as a boundary line between:
- (a) Connecticut and any other State, or
 - (b) Two Connecticut counties; or
 - (c) Two statistical territories included in the same rate table:

Assign the rate table and statistical code based on the side of the street where the auto is garaged.

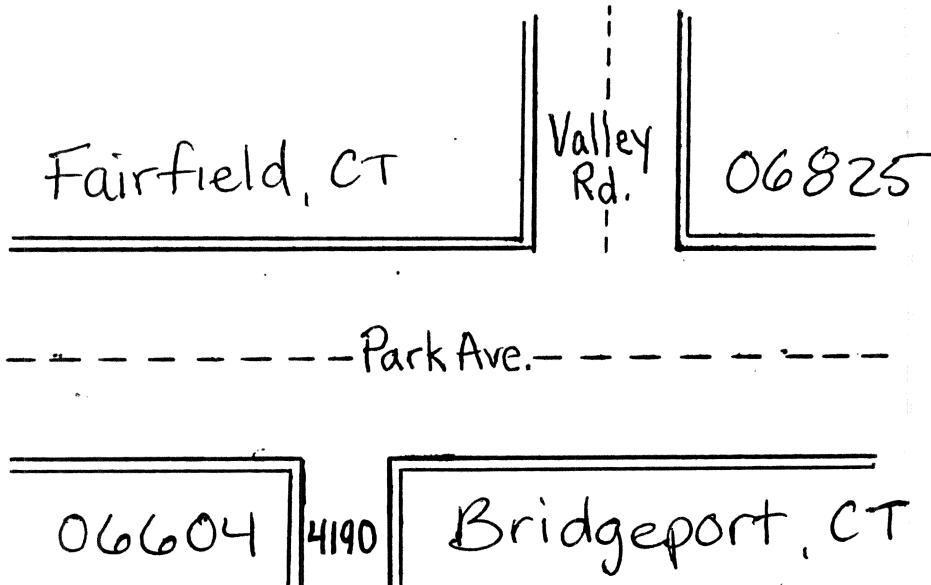
- * (4) When the center of a street, avenue or public way serves as a dividing line between two statistical territories that are located in the same county, but assigned to different rate tables:
- Assign to both sides of the street, the rate table and statistical code for the lower rated statistical territory.

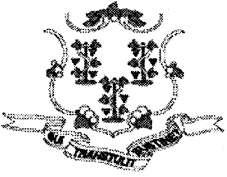
2. Connecticut Rate Tables:

- a. For rating purposes Connecticut is divided into rate tables. Each rate table consists of one or more of the statistical territories described above.
- b. The Connecticut Territory Definitions include for each county or section of a county the definition of the rate table, the rate table number and the TOWN name and statistical code number for each statistical territory included in the rate table.

3. List of Important Cities and Towns

- a. Connecticut Territory Definitions encompass ALL PLACES in Connecticut and the rate table and statistical code for EACH PLACE must be individually ascertained.
- b. The Connecticut Territory Pages contain a List of Important Cities and Towns in Connecticut indicating the county in which such places are located and the rate table and statistical code to which they are assigned.
- c. The TOWN names of each statistical territory, its county, rate table and statistical code are also included in the List of Important Cities and Towns.
- d. The rate table and statistical code for a place not listed should be determined as follows:
 - (1) If the county and TOWN can be ascertained:
 - Assign the rate table and statistical code corresponding to the appropriate TOWN in that county.
 - (2) If the county and/or TOWN cannot be ascertained:
 - (a) Refer to a map to determine the county and/or TOWN in which such unlisted place is located, and
 - (b) Assign the rate table and statistical code corresponding to the appropriate TOWN in that county.





STATE OF CONNECTICUT

INSURANCE DEPARTMENT

Consumer Services Division
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February 22, 2012

Marjorie Woman Rosten, Esquire, Executive Director
Greater Bridgeport Jewish Housing Corporation (The)
Seymour Hollander Apartments
4190 Park Avenue
Bridgeport, CT 06604

Re: Our File # 200850

Dear Ms. Rosten:

Our Department would reject any company who filed their rating program which did not comply with Bulletin PC-36 which was updated on 12/20/00. You can view this on our website www.ct.gov/cid. We are unaware of any company which is not in compliance but welcome you to send a written complaint if you encounter any violation of the bulletin.

Sincerely,

A handwritten signature in cursive script that reads "Carol A. Sarabia".

Carol A Sarabia
Associate Examiner

* see page 3



STATE OF CONNECTICUT

INSURANCE DEPARTMENT

Bulletin PC-36
December 20, 2000

Subject: Automobile Insurance Ratemaking Procedures

To: All Insurance Companies Authorized for Automobile Liability Insurance in Connecticut

Bulletin PC-36 updates and consolidates previous Connecticut Insurance Department bulletins regarding filing and ratemaking procedures for automobile insurance. This bulletin explains the minimum information that should be included in every automobile rate filing. Pursuant to Conn. Gen. Stat. §38a-389, base rates for bodily injury liability and uninsured and underinsured motorist coverage are subject to prior approval. This bulletin supersedes Insurance Department Bulletins PC-27, PC-14, NF 54, NF 55, NF 70, CIS-2, CIS-3, and CIS-4.

There are a number of changes from previous procedures which are intended to simplify the rate filing process, while at the same time providing the department with sufficient information to determine the insurer's compliance with statutory standards.

If an insurer files rates by reference to rates charged by another insurer, as permitted by Conn. Gen. Stat. §38a-688(a)(3), or an insurer files rates containing loss costs based on reference documents previously submitted by an advisory organization such as the Insurance Services Office, as permitted by Conn. Gen. Stat. §38a-688, then such insurers may limit the information they file to that described in Appendix 9. Filings may be submitted through the approved SERRF electronic filing system. Otherwise, a filing should include the following material.

- A. Two copies of a transmittal letter, and a stamped self-addressed envelope. If the Department approves the filing, it will stamp one copy "approved effective" or "recorded effective" and return it to the company. The company will be notified if the filing contains insufficient information.
- B. A complete set of revised manual rate pages and any manual rule pages being revised. All changes should be clearly indicated on a copy of the pages themselves or explained in an accompanying memorandum.
- C. An explanatory memorandum responding to the questions in Appendix 1. If the filing adopts or changes the classification plan, safe driver plan, territorial definitions, or rates for prior approval coverages, then you must submit complete supporting information.
- D. A set of exhibits as described below:
 - (1) An exhibit showing indicated and adopted statewide rate level changes as a percentage of current rates for each program by coverage. If an expense fee is treated as a separate rate, show changes for (a) variable rate, (b) fixed expense rate, and (c) combined rate. See Appendix 2.
 - (2) An exhibit showing adopted rate level changes for each territory by coverage as percentages of current rates. If the expenses fee is a separate rate, combine the effect of the variable rate portion and the expense fee portion. The format should follow that shown in Appendix 3.

- (3) Exhibits showing the company's statewide rate change indications broken down by accident year and coverage. The exhibits required under D.(3) may be in a format adapted to the company's own rate review process as long as they contain proper adjustments to the loss experience.
- (4) A set of exhibits, by coverage by territory, providing sufficient data to enable the Department to verify that the filing addresses the deficiencies described in the December 14, 1978 territorial decision. See PC-40, which is a re-issue of NF-54. These exhibits must reflect that:
 - (a) 100% of the expenses (general, other acquisition and miscellaneous licenses, taxes and fees) are reflected in the base rates as flat dollar amounts for all territories.
 - (b) Individual territorial loss cost data has been moderated with reference to statewide average loss costs by weighting the territorial indications with the statewide average 75%/25% (i.e. 75% being the maximum weight for the individual territorial loss cost data in calculating the territorial rate. Credibility procedures must be applied separately from the Department's 75% vs. 25% rule.

Credibility, as used in actuarial ratemaking for automobile rates, is a measure of predictability assigned to a body of loss experience. Credibility is a normal part of ratemaking. Its purpose is not to "temper" the cost of insurance in urban territories or any other territory. The stated purpose of the requirement of 75% vs. 25% weighting is to temper the rates in high rated urban areas. Companies may not substitute the 75% vs. 25% weighting in place of credibility formulas normally used in the ratemaking process. The weighting formulas must be used in addition to credibility, not instead of credibility.

- (5) An exhibit showing the premium dollar breakdown, identifying variable and fixed expense portions. See Appendix 4.
- (6) An exhibit showing investment income as a factor of the rates, how it was calculated and an explanation of how it was taken into consideration in the calculation of the newly filed rates.
- (7) An exhibit showing, by coverage, the annual trend factors used (frequency and severity, each separately) and the combined effect of these factors on each year of experience used in the filing. See Appendix 5.
- (8) An exhibit for each voluntary market program showing four sets of car year exposures by territory, preferably on an earned car year basis for the most recent one-year period, for (1) Bodily Injury, UM/UIM and Property Damage Liability coverages, (2) optional BRB or Medical Payments coverages (if both are sold, show separately), (3) Comprehensive coverage and (4) Collision coverage. Please note the year used on the exhibit, along with the name of the company and name of the program.
- (9) A set of examples which may be used by the Connecticut Insurance Department for Consumer Information. See Appendix 6 for a description of the examples. Premiums must be shown on an annual basis and in whole dollars.

See Appendix 7 for the format to be used in displaying the premiums for the examples. Please submit examples in a Microsoft Excel 97 or Workbook format.

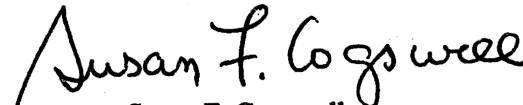
Note: rate examples are not required if the Connecticut Other Private Passenger Automobile Liability direct premium written on line 19.2 on page 14 of the most recently filed individual company annual statement shows less than one million dollars (i.e. before rounding).

(10) Appendix 8 is reserved for future use.

(11) An exhibit showing the distribution by policy limits for Bodily Injury Liability, Combined Single Limit Liability and UM/UIM (separate Standard and Conversion) coverages.

* E. Use of zip codes in territorial rating in Connecticut

1. Each rate territory is composed of one or more unique town codes. Companies may use zip codes to determine the territory of garaging for rating automobile insurance. Companies are not allowed to split a town or city into two territories. Company manuals must contain a rule that states if a street divides two rating territories or towns the rate used must be that of the lower of the two territories.
2. For private passenger non-fleet automobile insurance, the original filing of zip code conversion and any subsequent amendments to it are subject to prior approval. Before a company adopts a system which uses zip codes to determine rate territories, it must file a copy of the system with the Connecticut Insurance Department. The filing must include:
 - (a) A table of each zip code and its corresponding rate territory.
 - (b) A supplementary list of those zip codes which overlap two rate territories. Companies are not allowed to split a town or city into two territories. Company manuals must contain a rule that states that if a street divides two rating territories or towns the rate used must be that of the lower of the two territories.
 - (c) Explanations as to:
 - (1) how your system identifies the zip code of the place of garaging versus that of mailing address.
 - (2) how your system accounts for changes in zip codes as they occur.


Susan F. Cogswell
Insurance Commissioner