

October 1, 2010

**Analysis of
Office of Insurance Regulation
Rate Filing Number 10-14671**

**Workers Compensation Insurance
National Council on Compensation Insurance, Inc.**

**Office of the Insurance Consumer Advocate
State of Florida**

Prepared by:
Stephen A. Alexander, FCAS, MAAA, MBA



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Executive Summary

It is recommended that the Office of Insurance Regulation (OIR) disapprove the subject filing for the following reasons:

- Every workers compensation insurer in the state of Florida has elected to allow the National Council on Compensation Insurance (NCCI) to file rates on its behalf. However, the idea that one set of rates fits all insurers in the state is counterintuitive and is not supported by the actual loss and expense experience of workers compensation insurers in the state of Florida. Workers compensation insurers have different business models, different loss experience and different expense levels. All these differences should be reflected in different rates. Insurers generally file their rates individually (or deviate from bureau rates) for each of the other 41 lines of property and casualty insurance in the state of Florida.
- Disapproval of this filing could potentially save employers in the state of Florida as much as \$141 million (8.3% of \$1.7 billion) in the first year and even more in future years as the Florida workers compensation insurance market becomes more price competitive.
- Under a price competitive workers compensation insurance market, the OIR could shift its emphasis from controlling prices to preventing insurance company insolvencies and predatory pricing.
- The current system discriminates against small and medium sized employers, because their experience is not sufficiently credible to permit variation in pricing. Consequently, when small and medium sized employers shop for workers compensation insurance they are quoted the same NCCI filed and approved rates by virtually all of the 250 insurers writing such coverage in the state of Florida (only three workers compensation insurers deviate from NCCI approved rates). In contrast, large employers shopping the Florida market find that insurers aggressively compete on price for their business by offering them multiple pricing options including large deductible plans, dividend plans and retrospective rating plans.
- The Florida workers compensation system has served to enrich the insurance industry at the expense of employers paying excessive premiums and injured workers receiving inferior benefits. Insurers in the state of Florida have earned excessive profits and have accumulated capital far in excess of what is needed to write workers compensation insurance. The 25 largest workers compensation insurers in the state of Florida earned an estimated gross profit of 30.3% of earned premiums over the last five years while earning investment income of an estimated additional 20.1% of earned premiums and now hold more than three times minimum risk-based capital. Several of the 25 largest workers compensation insurers in the state of Florida earned much higher gross profits and are holding far more capital (surplus). In contrast, Florida's workers compensation benefits as measured by injured worker satisfaction are some of the worst in the country as reported in a study completed in 2010 by the Workers Compensation Research Institute.

- There is no legal barrier to companies filing their own workers compensation rates. Current Florida law provides that “every (*workers compensation*) insurer shall file with the office every manual of classifications, rules, and rates, every rating plan, and every modification of any of the foregoing which it proposes to use.” (s. 627.091(1), F.S.)
- The OIR has a staff of 7 property and casualty actuaries and 23 property and casualty rate and form analysts which reviewed 23,898 rate and rule filings in 2009. If all 250 workers compensation insurers operating in the state of Florida made two rate filings in 2009, this would have increased the OIR actuarial staff’s workload by an average of only 2.1%. Furthermore, Florida’s property and casualty actuarial staff of 7 actuaries is the third largest in the country and Florida’s combined staff of 30 property and casualty actuaries, rate and form analysts is the second largest in the country (tied with Texas). Since insurers generally file individually (or file deviations from bureau rates) for nearly all lines of insurance (including workers compensation) in nearly all other states, it is believed reasonable to assume that a small percentage increase in total rate filings could be easily absorbed by existing OIR actuarial staff.

Single Set of Rates

On June 4, 2009, in a presentation before the Title Insurance Study Advisory Council, the Chief Counsel for the OIR, Mr. Steve Parton, said the following about title insurance rates in the state of Florida:

“...it would be more appropriate to require a title insurer, just like any other insurer, to make individual rate filings for the approval of rates that they want to use. This has a number of advantages: 1) Insurers obviously have the data ... that would be needed in order to justify the rates they want to charge, and 2) It would introduce a level of competition into the marketplace based on price. *The idea that one rate fits all, frankly, is counterintuitive.* Every insurance company’s model is different. Their expenses, their experience is different. Therefore, one would think that their rates would be different as well.”

The state of Florida currently sets the rates for title insurers under title insurance administrative rule 69O-186. If it is counterintuitive that “one rate fits all” in title insurance then it should also be counterintuitive that “one rate fits all” in workers compensation insurance.

Competitive rating does not mean that the OIR will completely give up oversight of workers compensation insurance. The OIR will still maintain the power to reject any rates it deems to be inadequate, excessive or unfairly discriminatory (section 627.062(e), F.S.), and will still have the authority to require insurers to refund excessive rates to policyholders (section 627.062(2)(h), F.S.) and pay fines (section 627.381(1), F.S.), if rates are not deemed appropriate.

Furthermore, under competitive rating, the OIR will retain the power to prevent predatory pricing by rejecting rates of any insurer attempting to monopolize the market by lowering prices below costs to drive competitors out of business (section 627.062(e), F.S.).

The Florida legislature passed Senate Bill 1926 in 2004 with the clear intent to allow for easier deviations from the NCCI filed rates. However, “despite the changes in section 627.211, Florida Statutes, made by chapter law 2004-82 (Senate Bill 1926) to allow for easier approval of deviations, only one insurer has filed for a new deviation since the law became effective on July 1, 2004 and that was approved during 2006. Two insurers have renewed their prior deviation, which means there are currently only three insurance companies with a deviation in Florida (the average deviation is a downward 10%)”, Florida Office of Insurance Regulation, 2008 Workers’ Compensation Annual Report, January, 2009, Page 37.

There are 42 lines of property and casualty insurance in the state of Florida. For nearly all of these lines of insurance, except workers compensation, insurance companies typically file their own rates (or file deviations from bureau rates) in the state of Florida as well as in other states. The 42 lines of property and casualty insurance and the associated amounts of written premium in the state of Florida are shown in Exhibit 6.

Different Loss, Expense and Profit Experience

Exhibit 1 displays the loss and expense experience of the 25 largest workers compensation insurers in the state of Florida over the five calendar year period ending December 31, 2009. This exhibit shows wide variations in every expense item as well as wide variations in gross profit margins from 56.0% to 14.1%. Moreover, because of the extended five year measurement period and large writings of these insurers, these variations in expenses cannot be attributed to chance. Therefore, the NCCI's current rate setting process based on average expense assumptions seriously misprices rates for both the most profitable and the least profitable workers compensation insurers in the state of Florida.

The 25 largest insurers represent only 10% of the 250 insurers in the state of Florida but write approximately 68% of the workers compensation insurance. Exhibit 1 is derived from the Florida State Page data reported in each insurer's Statutory Annual Statement. The Florida State Page data includes: direct written and earned premiums, incurred losses, commission and brokerage expenses, dividends, defense and cost containment expenses, and taxes, licenses and fees - all incurred in the state of Florida.

The ratios in Exhibit 1 are based upon ratios of direct incurred expenses to direct earned premiums except the commission and brokerage expense ratios, which are based upon ratios to direct written premiums. The Florida State Page data does not include federal income taxes, investment income and the following overhead expenses: 1) other adjusting expenses, 2) other acquisition expenses, and 3) general expenses. Exhibit 1 shows the gross profit margins, or contributions to overhead expenses, in the state of Florida for each company over the five year period. Each insurer's gross profit margin is computed as 100% minus each of the following: 1) the incurred loss ratio, 2) the commission and brokerage expense ratio, 3) the dividend ratio, 4) the defense and cost containment expense ratio, and 4) the taxes, licenses and fees ratio.

Different Levels of Risk-Based Capital

Many of the 25 largest insurers in the state of Florida have accumulated capital far in excess of what is needed to write workers compensation insurance. Exhibit 2 shows a wide range of ratios of surplus to minimum risk-based capital for the 25 largest insurers writing workers compensation insurance in the state of Florida. These ratios range from 10684.5% to 112.8% with a median value of 342.7%.

Insurance regulators place minimum capital requirements upon insurers to protect consumers from unpaid claims due to insurer insolvencies. By law, each insurer must calculate annually its minimum risk-based capital reflecting all of the risks associated with writing property and casualty insurance. Insurers must hold minimum amounts of capital to avoid regulator supervision or intervention.

Staffing Requirements

The OIR has a staff of 7 property and casualty actuaries and 23 property and casualty rate and form analysts (Exhibit 5) who reviewed 23,898 rate and rule filings in 2009 (OIR, Electronic Data Management System). If all 250 workers compensation insurers in Florida made two rate filings in 2009, this would have increased the OIR actuarial staff's workload by an average of only 2.1%. Furthermore, Florida's property and casualty actuarial staff of 7 actuaries is the third largest in the United States and Florida's combined staff of 30 property and casualty actuaries, rate and form analysts is the second largest in the country (tied with Texas). Since insurers generally file individually (or file deviations from bureau rates) for nearly all lines of insurance (including workers compensation) in nearly all other states, it is believed reasonable to assume that a small increase in workers compensation rate filings could be easily absorbed by existing OIR actuarial staff.

Injured Worker Dissatisfaction

According to the study: *How Have Worker Outcomes and Costs Changed in Wisconsin?*, Workers Compensation Research Institute, May 2010, Florida injured workers reported being among the least satisfied with their workers compensation benefits of the injured workers surveyed. The study found that of the 11 states surveyed, Florida ranked last in the percentage of injured workers who were “somewhat” satisfied or “very” satisfied with: 1) the time from injury to first visit with their initial provider, and 2) the time from injury to initial visit with their primary care provider.

Furthermore, Florida ranked second to last in satisfaction with overall health care. The other states surveyed in addition to Florida were California, Texas, Tennessee, Maryland, North Carolina, Michigan, Pennsylvania, Connecticut, Massachusetts and Wisconsin.

Contrast these low levels of Florida injured worker satisfaction with the high levels of profits and surplus accumulated by Florida workers compensation insurers. As shown in Exhibit 1, the average gross profit margin for the 25 largest workers compensation insurers in the state of Florida over the last five years was 30.3%. Additionally, workers compensation insurers earned investment income that averaged 20.1% of net earned premiums on a countrywide basis (Exhibit 3) over the same time period (insurers do not report investment income on an individual state basis).

If it is assumed that Florida investment income levels approximated countrywide levels over the last five years, then the 25 largest workers compensation insurers in the state of Florida averaged total gross profits plus investment income of 50.4% of premiums. This 50.4% represents the percentage of earned premium which was available to cover overhead expenses.

The provision for overhead expenses in the NCCI’s currently proposed rates is only 13.6% (Exhibit 4) and has not changed materially over the last five years. Therefore, the Florida workers compensation system has served to enrich the insurance industry at the expense of employers paying excessive premiums and injured workers receiving inferior benefits.

Exhibits 1 - 6



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2005 through 2009 Calendar Years
Gross Profit Margins

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
	Direct Written Premium	Direct Earned Premium	Incurred Loss Ratio	Commission Ratio	Dividend Ratio	Defense and Cost Containment Ratio	Taxes, Licenses and Fees Ratio	Gross Profit Margin
American Home Assur Co	377,037,672	416,993,229	29.0%	1.7%	0.0%	5.2%	8.1%	56.0%
Hartford Underwriters Ins Co	219,358,379	231,980,540	27.0%	7.8%	7.8%	3.4%	6.2%	47.9%
First Commercial Ins Co	262,200,812	264,966,106	29.7%	10.4%	0.0%	9.6%	5.7%	44.6%
Zenith Ins Co	862,964,212	888,614,059	33.6%	8.5%	6.2%	4.2%	4.7%	42.7%
Aequicap Ins Co	173,052,741	172,337,516	36.8%	11.9%	0.1%	3.2%	5.9%	42.1%
Valley Forge Ins Co	208,413,483	209,431,761	33.3%	8.3%	11.4%	3.0%	5.0%	39.0%
Amerisure Mut Ins Co	231,286,021	246,270,953	28.0%	18.1%	7.6%	4.6%	5.7%	36.0%
Employers Preferred Ins Co	312,818,167	341,965,396	35.9%	10.1%	6.5%	6.6%	5.8%	35.1%
Comp Options Ins Co Inc	176,854,481	179,738,980	27.3%	10.6%	11.8%	9.2%	5.7%	35.4%
Guarantee Ins Co	186,513,743	189,761,949	34.4%	9.1%	0.0%	18.3%	6.0%	32.2%
Bridgefield Employers Ins Co	2,055,901,261	2,055,901,261	44.2%	7.5%	8.4%	6.6%	2.2%	31.1%
Bridgefield Cas Ins Co	201,135,475	201,135,475	44.4%	10.9%	1.0%	7.9%	5.6%	30.2%
Ace Amer Ins Co	183,982,401	192,846,260	47.3%	2.5%	0.0%	8.7%	12.6%	28.9%
FFVA Mut Ins Co	411,107,361	413,207,811	42.1%	9.3%	6.9%	7.6%	6.9%	27.2%
Insurance Co Of The State Of PA	429,544,566	422,631,432	54.9%	4.0%	0.0%	5.5%	9.7%	25.7%
FCCI Ins Co	809,008,772	822,093,883	44.6%	13.8%	4.8%	6.1%	5.8%	24.9%
Commerce & Industry Ins Co	568,043,501	658,924,711	52.0%	7.3%	0.0%	9.2%	7.5%	23.9%
Charter Oak Fire Ins Co	203,994,936	213,068,081	54.3%	6.7%	0.6%	6.1%	8.4%	23.9%
Associated Industries Ins Co Inc	243,227,457	268,589,965	57.1%	8.8%	1.4%	7.0%	6.7%	19.0%
Florida Hospitality Mut Ins Co	201,057,561	193,513,493	48.3%	9.3%	4.4%	13.3%	5.8%	18.9%
Everest Natl Ins Co	218,646,588	232,875,568	44.8%	20.5%	3.3%	9.4%	5.8%	16.1%
Twin City Fire Ins Co Co	327,765,562	315,383,883	58.0%	7.8%	4.6%	6.7%	6.2%	16.7%
Liberty Ins Corp	301,068,245	301,917,637	63.6%	1.0%	1.0%	7.8%	10.5%	16.1%
Technology Ins Co Inc	289,611,188	273,311,924	51.2%	19.2%	1.5%	5.4%	6.4%	16.3%
Zurich Amer Ins Co	425,691,580	412,058,103	62.2%	8.3%	0.4%	7.1%	7.9%	14.1%
Total / Average / Median	9,880,286,165	10,119,519,976	43.9%	8.7%	4.4%	6.8%	5.8%	30.3%
Total Industry	14,565,534,593	14,708,800,948						
% Total Industry	67.8%	68.8%						

Notes:

Ratios are to direct earned premiums except the commission and brokerage expense ratios, which are to direct written premiums.

Source is the Florida State Page data from the Statutory Annual Statements.

(8) 100% - (3) - (4) - (5) - (6) - (7)

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Surplus to Minimum Risk-Based Capital Ratios
as of 12/31/09

	Surplus	Minimum Risk Based Capital	% of Minimum
First Commercial Ins Co	n/a	n/a	n/a
Valley Forge Ins Co	54,028,279	505,670	10684%
Bridgefield Cas Ins Co	43,419,044	511,904	8482%
Bridgefield Employers Ins Co	102,856,892	3,655,274	2814%
FFVA Mut Ins Co	116,378,498	12,324,544	944%
Comp Options Ins Co Inc	27,540,666	2,925,524	941%
Zenith Ins Co	979,163,633	133,510,450	733%
Florida Hospitality Mut Ins Co	58,339,375	7,974,220	732%
Twin City Fire Ins Co Co	305,238,895	42,919,970	711%
Employers Preferred Ins Co	149,224,067	21,171,068	705%
Hartford Underwriters Ins Co	645,913,047	106,522,678	606%
Everest Natl Ins Co	164,001,021	31,205,970	526%
FCCI Ins Co	427,389,511	121,583,176	352%
Commerce & Industry Ins Co	2,750,538,583	823,796,010	334%
Amerisure Mut Ins Co	620,360,904	201,180,380	308%
Liberty Ins Corp	272,612,416	89,214,862	306%
Associated Industries Ins Co Inc	51,635,166	17,467,668	296%
Charter Oak Fire Ins Co	228,630,688	79,241,100	289%
Technology Ins Co Inc	167,315,540	67,391,322	248%
Insurance Co Of The State Of PA	1,985,387,640	830,113,252	239%
Ace Amer Ins Co	2,010,797,478	851,120,970	236%
American Home Assur Co	5,872,348,964	2,694,357,594	218%
Zurich Amer Ins Co	7,417,150,618	3,839,745,644	193%
Aequicap Ins Co	12,440,803	8,241,588	151%
Guarantee Ins Co	17,202,692	15,247,010	113%
Total / Median	24,479,914,419	10,001,927,848	343%

Note:

Source is Five-Year Historical Data exhibits of Statutory Annual Statements.
Minimum Risk-Based Capital equals 2 times Action Control Level Risk-Based
Capital.

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Workers Compensation Industry Composite
 Statements of Income 2005 through 2009

	2009		2008		2007		2006		2005		Total	
Premiums Earned	\$12,340,192,000	100.0%	\$14,035,851,000	100.0%	\$14,068,252,000	100.0%	\$16,435,565,000	100.0%	\$21,565,157,000	100.0%	\$78,445,017,000	100.0%
Losses Incurred	8,348,150,000	67.7%	8,475,520,000	60.4%	8,274,002,000	58.8%	9,739,939,000	59.3%	13,845,412,000	64.2%	48,683,023,000	62.1%
Loss Adjustment Expenses Incurred	2,275,964,000	18.4%	2,365,650,000	16.9%	2,012,684,000	14.3%	2,148,077,000	13.1%	2,654,134,000	12.3%	11,456,509,000	14.6%
Underwriting Expenses Incurred	3,581,662,000	29.0%	3,860,416,000	27.5%	3,509,261,000	24.9%	3,885,964,000	23.6%	4,353,181,000	20.2%	19,190,484,000	24.5%
Other Deductions	19,375,000	0.2%	8,498,000	0.1%	557,000	0.0%	7,091,000	0.0%	5,448,000	0.0%	40,969,000	0.1%
Dividends to Policyholders	499,940,000	4.1%	860,232,000	6.1%	776,734,000	5.5%	584,508,000	3.6%	752,899,000	3.5%	3,474,313,000	4.4%
Net Underwriting Income	-2,384,899,000	-19.3%	-1,534,465,000	-10.9%	-504,986,000	-3.6%	69,986,000	0.4%	-45,917,000	-0.2%	-4,400,281,000	-5.6%
Net Investment Income	3,418,696,000	27.7%	3,482,618,000	24.8%	2,989,474,000	21.2%	2,863,512,000	17.4%	3,012,601,000	14.0%	15,766,901,000	20.1%
Other Income (Expenses)	-96,310,000	-0.8%	-173,349,000	-1.2%	-58,837,000	-0.4%	-111,915,000	-0.7%	174,468,000	0.8%	-265,943,000	-0.3%
Pretax Operating Income	937,487,000	7.6%	1,774,804,000	12.6%	2,425,651,000	17.2%	2,821,583,000	17.2%	3,141,152,000	14.6%	11,100,677,000	14.2%
Realized Capital Gains	-449,678,000	-3.6%	-624,066,000	-4.4%	294,295,000	2.1%	141,952,000	0.9%	332,272,000	1.5%	-305,225,000	-0.4%
Federal Income Taxes Incurred	127,051,000	1.0%	398,718,000	2.8%	448,523,000	3.2%	533,317,000	3.2%	410,719,000	1.9%	1,918,328,000	2.4%
Net Income	\$360,758,000	2.9%	\$752,020,000	5.4%	\$2,271,423,000	16.1%	\$2,430,218,000	14.8%	\$3,062,705,000	14.2%	\$8,877,124,000	11.3%

Notes:
 Sources are Best's Aggregates and Averages, Property and Casualty, 2006 through 2010 Editions.
 The workers' compensation industry composite statement of income presents the consolidated operating results for individual insurance companies doing more than 50% of their business in workers' compensation insurance in the United States and Canada.

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Indicated Overhead Expenses

	(1) Percentage of Standard Premium After Discounts	(2) Percentage of Net Premium Excluding Expense Constant	(3) Percentage of Net Premium Including Expense Constant
(4) Benefit	57.5%	63.0%	62.4%
(5) Defense and Cost Containment	10.2%	11.2%	11.0%
(6) All Other Loss Adjustment Expense	4.5%	4.9%	4.9%
(7) Benefit and Loss Adjustment	72.2%	79.1%	78.3%
(8) Other Acquisition	3.5%	3.8%	3.7%
(9) Commission and Brokerage	6.6%	7.2%	7.1%
(10) General	3.6%	3.9%	4.9%
(11) Profit and Contingency	2.3%	2.5%	2.5%
(12) Premium Taxes, Licenses and Fees	3.2%	3.5%	3.5%
(13) Total	91.3%	100.0%	100.0%
(14) Total Overhead Expenses	11.5%	12.6%	13.6%

Notes:

- (1) NCCI Exhibit II
- (2) (1) / .913
- (3) (2) x .990 except General expense equals (2) + 1.0%. Assumes Expense Constant is part of General expense.
- (7) (4) + (5) + (6)
- (13) (7) + (8) + (9) + (10) + (11) + (12)
- (14) (6) + (8) + (10). Overhead expenses are considered to be expenses that do not vary directly with premiums or losses.

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Actuarial Staff by State

	Rate & Form				Rate & Form		
	Actuaries - Analysts -				Actuaries - Analysts -		
	P/C	P/C	Total		P/C	P/C	Total
California	-	67.0	67.0	Arizona	0.5	5.0	5.5
Texas	9.0	21.0	30.0	Nevada	1.0	4.0	5.0
Florida	7.0	23.0	30.0	Hawaii	-	5.0	5.0
New York	18.0	-	18.0	Oregon	2.0	2.5	4.5
Virginia	-	16.0	16.0	Washington	1.0	3.0	4.0
New Jersey	5.0	10.0	15.0	Colorado	1.0	3.0	4.0
Illinois	4.0	8.0	12.0	Indiana	-	4.0	4.0
Ohio	5.0	6.0	11.0	Arkansas	-	4.0	4.0
Kansas	1.0	9.0	10.0	Maine	1.0	3.0	4.0
Missouri	1.0	8.0	9.0	New Hampshire	1.0	3.0	4.0
Georgia	1.0	7.0	8.0	Alabama	-	4.0	4.0
Maryland	1.0	6.0	7.0	Minnesota	-	3.0	3.0
North Carolina	3.0	4.0	7.0	Vermont	-	3.0	3.0
Kentucky	-	7.0	7.0	Louisiana	1.0	2.0	3.0
New Mexico	4.0	3.0	7.0	Iowa	1.5	1.0	2.5
Michigan	-	7.0	7.0	Montana	1.0	1.5	2.5
Pennsylvania	4.0	2.0	6.0	North Dakota	1.0	1.5	2.5
Connecticut	1.0	5.0	6.0	Tennessee	2.0	-	2.0
Oklahoma	-	6.0	6.0	Wisconsin	-	2.0	2.0
Nebraska	2.0	4.0	6.0	Wyoming	-	2.0	2.0
West Virginia	1.0	5.0	6.0	South Dakota	-	1.5	1.5
South Carolina	1.0	5.0	6.0	Utah	-	1.0	1.0
Mississippi	-	6.0	6.0	Delaware	-	1.0	1.0
Alaska	1.0	5.0	6.0	Idaho	-	1.0	1.0
Massachusetts	2.0	3.6	5.6	Rhode Island	-	1.0	1.0
					85.0	305.6	390.6

Note:

Source is the NAIC 2009 Insurance Department Resources Report, Page 7.

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Written Premiums by Line of Business in the State of Florida
(\$000s)

	Direct Premiums Written	Market Share
Homeowners multiple peril	6,932,272	19.39%
Other private passenger auto liability	6,157,284	17.23%
Private passenger auto physical damage	3,544,112	9.92%
Allied lines	2,809,869	7.86%
Private passenger auto no-fault (personal injury protection)	2,235,879	6.26%
Workers' compensation	1,700,423	4.76%
Other liability - occurrence	1,682,289	4.71%
Fire	1,658,840	4.64%
Commercial multiple peril (non-liability portion)	1,441,162	4.03%
Other commercial auto liability	1,188,100	3.32%
Federal flood	913,922	2.56%
Inland marine	793,759	2.22%
Other liability - claims-made	760,690	2.13%
Medical professional liability	568,546	1.59%
Commercial multiple peril (liability portion)	535,285	1.50%
Mortgage guaranty	423,506	1.18%
Surety	319,280	0.89%
Commercial auto physical damage	289,620	0.81%
Warranty	272,383	0.76%
Ocean marine	264,339	0.74%
Products liability	155,205	0.43%
Credit	151,496	0.42%
Group accident and health	149,397	0.42%
Aircraft (all perils)	113,672	0.32%
Multiple peril crop	93,332	0.26%
Guaranteed renewable A&H	80,453	0.23%
Boiler and machinery	65,309	0.18%
Commercial auto no-fault (personal injury protection)	64,894	0.18%
Excess workers' compensation	55,976	0.16%
Fidelity	52,067	0.15%
Financial guaranty	44,302	0.12%
Earthquake	31,638	0.09%
Farmowners multiple peril	25,782	0.07%
Burglary and theft	9,722	0.03%
All other A&H	8,242	0.02%
Non-renewable for stated reasons only	7,909	0.02%
Credit A&H (group and individual)	4,186	0.01%
Other accident only	2,103	0.01%
Collectively renewable A&H	268	0.00%
Non-cancelable A&H	4	0%
Medicare Title XVIII exempt from state taxes or fees	0	0%
Federal employees health benefits program premium	0	0%
Grand Total for Lines of Business	35,742,953	100%

Note:

Source is the NAIC I-Site database Lines of Business Summary Report.