Delaware Compensation Rating Bureau, Inc.



United Plaza Building • Suite 1500 30 South 17th Street Philadelphia, PA 19103-4007 (302) 654-1435 (215) 568-2371 FAX (215) 564-4328 www.dcrb.com

April 3, 2008

VIA OVERNIGHT DELIVERY

The Honorable Matthew Denn Insurance Commissioner State of Delaware Department of Insurance 841 Silver Lake Boulevard Dover, DE 19901

Attention: Gene Reed

RE: Bureau Filing No. 0803 - Proposed Effective June 1, 2008

Manual Revisions - Sections 1, 2 and 5

Code 818, Automobile Or Automobile Truck Dealer

Dear Commissioner Denn:

On behalf of the members of the Delaware Compensation Rating Bureau, Inc. (DCRB) I am filing herewith proposed revisions to Sections 1, 2 and 5 of the Manual. These revisions are proposed to become effective as of **12:01 a.m., June 1, 2008** with respect to new and renewal business only.

The Bureau last reviewed Code 818, Automobile Or Automobile Truck Dealer, in 2005. That review was undertaken to determine whether the scope of Code 818 was sound. The study found the scope to be sound except for the inclusion of automobile auctions, and the Bureau subsequently proposed and the Department of Insurance approved separating such businesses from Code 818 and placing them into a new, separate classification, Code 820.

The current review was initiated in response to recent and ongoing discussions regarding how to classify selected automobile dealership personnel, including a recent written request from the Delaware Automobile and Truck Dealers Association pertaining to the classification of a broader range of selected automobile dealership employees.

The Bureau views the Association's request as raising significant and problematic issues within the uniform classification system and as being founded upon some popular misconceptions concerning classification and the pricing of workers compensation insurance. After a careful and complete study of the issue, staff has developed an alternative proposal to resolve the present ongoing classification discussions and to concurrently level the playing field within the automobile dealership industry and between that industry and other types of businesses as much as possible. The Bureau proposes to make Code 818 applicable to "all employees"

The Honorable Matthew Denn State of Delaware April 3, 2008 Page 2

including office," revising the scope to make it applicable for any and all employees of businesses assigned to Code 818 regardless of individual employee job duties. While this proposal will not impact overall premium costs for automobile dealerships, it will eliminate potential errors in the allocation of payroll to classification within this industry.

The proposed Manual revisions are shown below with deleted wording bracketed and new wording underlined:

SECTION 1

CHANGE

RULE IV - CLASSIFICATIONS

B. CLASSIFICATIONS

- 2. Standard Exception Classification
 - **c. SALESPERSONS OUTSIDE, Code 951** are employees...... except office.

[Automobile]Mobile, self-propelled factory, farm or construction equipment Salespersons – Code 819 are employees engaged in selling such [duties] equipment, or auctioning automobiles or instructing persons how to drive an automobile or truck on and away from the insured's premises. [Such classification] The separate Code 819 shall be treated as Salespersons – Outside, Code 951 for the purposes of this rule [but are assigned to Code 819].

SECTION 2

CHANGES

818 AUTOMOBILE or Automobile Truck **DEALER** – [including service counter and parts department]All Employees Including Office.

[Please see the Auditing Ruling and Interpretation – "Automobile Dealerships," Section 5 for further information.]

Also includes but is not necessarily limited to: inland boat dealers, mobile home dealers, recreational vehicle dealers or specialist contractors performing mobile home set-up or warranty service.

OPERATIONS NOT INCLUDED:

1. <u>Assign Code 652 to modular home setup or erection, warranty service, remodeling or repair.</u>

The Honorable Matthew Denn State of Delaware April 3, 2008 Page 3

CHANGES (continued)

819 [AUTOMOBILE or Automobile Truck] MOBILE, SELF-PROPELLED factory, farm or construction EQUIPMENT SALESPERSON

	PROPOSED EFF. 6/1/08	PROPOSED EFF. 6/1/08	RESIDUAL MARKET		IENCE RA [·] PLAN ed Loss Fa Table		HAZARD GROUP
CODE	RESIDUAL MKT. RATE	LOSS COST	MINIMUM PREMIUM	A-1	A-2	A-3	
818 819	\$2.66 1.40	\$2.01 1.06	\$ 880 590	\$0.49 0.26	\$0.62 0.33	\$0.68 0.36	III III

SECTION 5 RULINGS & INTERPRETATIONS

CHANGES

RENTAL CLERKS – AUTOMOBILE/TRUCK RENTAL AGENCIES

[As a general rule...... or Code 953.]

DELETION

AUTOMOBILE DEALERSHIPS

This Ruling and Interpretation shall be deleted in its entirety.

UNDERWRITING GUIDE

CHANGES

Automobile Rental – No Drivers [(Rental Clerks To Be Assigned To Code 819)]	818
Truck Rental – Without Drivers [(Rental Clerks To Be Assigned To Code 819)]	818
<u>DELETION</u>	

Rental Clerk Employed By An Automobile Or Truck Rental Agency...... 819

The Honorable Matthew Denn State of Delaware April 3, 2008 Page 4

Two Bureau staff memoranda dated February 8, 2008 and related exhibits are enclosed.

The DCRB stands ready to respond to any questions which the Department may have regarding any part of this filing and respectfully requests a timely approval allowing the maximum possible advance notice of approved changes for the benefit of our members and their insured employers.

Sincerely,

Timothy L. Wisecarver

Timothy L. Wisecawer

President

TLW/kg Enclosures

Delaware Compensation Rating Bureau, Inc.



United Plaza Building • Suite 1500 30 South 17th Street Philadelphia, PA 19103-4007 (302) 654-1435 (215) 568-2371 FAX (215) 564-4328

TO: Delaware Classification and Rating Committee

FROM: David T. Rawson

Technical Director, Classification & Field Operations

DATE: February 8, 2008

RE: Executive Summary - Code 818, Automobile or Automobile Truck Dealer

A Proposal to Revise Class to Become Applicable to "All Employees Including Office"

For the second time in three years the Bureau has reviewed Code 818. The previous review, done in 2005, was initiated by staff to determine whether Code 818's scope was sound. That review found that the scope was sound except for the inclusion of automobile auctions. The Bureau proposed and the Delaware Department of Insurance approved separating such businesses from Code 818 and placing them into a new, separate classification.

Staff initiated this second review in response to recent and ongoing discussions regarding how to classify selected automobile dealership personnel, including a recent written request from the Delaware Automobile and Truck Dealers Association pertaining to the classification of a broader range of selected automobile dealership employees.

The Bureau views the Association's request as raising significant and problematic issues within the uniform classification system and as being founded upon some popular misconceptions concerning classification and pricing of workers compensation insurance. Upon reflection, staff has developed an alternative proposal to resolve the present ongoing classification discussions and to concurrently level the playing field within the automobile dealership industry and between that industry and other types of businesses as much as possible. Staff proposes to make Code 818 applicable to "all employees including office," revising Code 818's scope to make it applicable for any and all employees of businesses assigned to Code 818 regardless of individual employee job duties. While this alternative proposal will not impact overall premium costs for automobile dealerships, it will eliminate potential errors in the allocation of payroll to classification within this industry.

Staff proposes to revise Code 818 to an "all employees including office" basis effective beginning new and renewal policies of June 1, 2008 and later. This proposal results in the following classification rating values:

- The proposed Code 818 voluntary market loss cost is \$2.01, and the proposed residual market rate is \$2.66.
- The revisions to Code 819 result in a proposed voluntary market loss cost of \$1.06 and a proposed residual market rate of \$1.40. The proposed voluntary market change is \$0.02 higher than the approved December 1, 2007 voluntary market loss cost. The proposed residual market rate is \$0.03 higher than the approved December 1, 2007 proposed residual market rate. Both proposed rating values are still substantially lower than the approved \$1.25 and \$1.76 approved December 1, 2006 Code 819 voluntary and residual market rates.
- The Bureau does not propose any revision to the Code 953 voluntary and residual market rating values of \$0.45 and \$0.60, respectively.

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TO: Delaware Classification and Rating Committee

FROM: David T. Rawson

Technical Director, Classification & Field Operations

DATE: February 8, 2008

RE: Code 818, Automobile or Automobile Truck Dealer

A Proposal to Revise Class to Become Applicable to "All Employees Including Office"

This is the second time in three years that Bureau staff has reviewed the scope of Code 818. The previous review was undertaken in 2005 and completed in early 2006. Staff initiated that earlier review to determine whether Code 818's scope was overly broad and, if so, whether specific pieces of Code 818 (e.g., auto and/or truck rental, motorcycle dealers, automobile auctions) could be placed into new, separate classifications. Staff found the scope of Code 818 to be sound except for the inclusion of automobile auctions in the class. The Delaware Department of Insurance approved the resultant Bureau proposal to place automobile auctions into a new, separate classification, Code 820, Automobile Auction, effective for new and renewal policies of August 1, 2006 and later.

The current review was also staff-initiated, in response to recent and ongoing discussions regarding the classification applicable to selected automobile dealership personnel. The classification applicable to cashiers and service advisors is the most popular question arising in this regard. This issue has surfaced in Bureau test audits of automobile dealers and in classification inquiries from other automobile dealers. The inquiries from automobile dealers typically suggest that a competitor has had certain of their personnel assigned to Code 819, Automobile Salesperson, or Code 953, Office, but the automobile dealer raising the question states that their personnel performing the same duties have been included in Code 818. The inquiring employer wants the same assignment for such personnel as the competitor allegedly enjoys.

The question of how to classify a broader range of selected automobile dealership personnel also surfaced in a recent written request from the Delaware Automobile and Truck Dealers Association (Association) that the Bureau review what their request characterizes as the "restrictions" placed upon the use of Codes 819 and Code 953 within the dealerships' operations.

In considering the Association's request, the Bureau is mindful of the Delaware Classification Plan's objective of classifying each business, rather than the individual employments, occupations or operations that constitute the business. The Association's request would conflict with other Manual rules as filed with and approved by the Department and would, if accepted and then equitably extended to other types of business assigned to other

Memorandum of February 8, 2008

RE: Code 818, Automobile or automobile Truck Dealer

A Proposal To Revise Code 818 to "All Employees Including Office"

Page 2

classifications, require systemic revision to the Manual rules (e.g., a revised and broader Manual definition of clerical). Finally, because any classification's rating value is an average of the various occupational exposures subsumed therein, proposals such as that advanced by the Association can only reallocate premiums among individual employers, rather than accomplishing any net reduction of those premiums.

Workers' compensation classification systems are designed and intended to equitably assign shares of the cost of providing injured workers benefits to various kinds of businesses. The objectives of this system include grouping businesses with similar loss potential, providing industry-based incentives for accident prevention, establishing self-supporting levels of rating values and promoting an active and competitive market among insurers for each class of business. While this process can and does adjust the relative shares of system cost borne by groups of employers defined as being included in separate classifications, it does not and cannot in and of itself raise or lower the cost of work-related injuries occurring in Delaware.

In pondering this question, Bureau staff has developed an alternative proposal to revise Code 818's scope that will put to an end the present ongoing classification disputes and level the playing field as much as possible. This alternative proposal is to revise Code 818 into an "all employees including office" classification. Such a classification scope would mean that all personnel of a business assigned to Code 818 would be assigned to the same classification regardless of their individual job duties or whether any employee works in a physically separate work area or department. The overall collectible premium from businesses assigned to Code 818 would be unchanged by adopting an "all employees including office" scope, but each employer's future workers' compensation policy audits would be uniform, with each employer's entire annual auditable payroll being assigned to one classification. Under this approach, there can be no error in the allocation of payroll to classification (as there would be one classification in place instead of the present three classes), and all incurred losses would be (correctly) assigned to that classification.

Staff submits that this is also an opportune time to propose to revise Code 818 to "all employees including office," as the previous classification study completed in 2006 found that the class' scope was sound except for automobile auctions, which are now subject to a separate classification.

The Code 818 historical experience exhibit was developed on the basis of the Bureau's December 1, 2007 comprehensive rating values revision, as approved by the Insurance Commissioner. Six historical experience exhibits are attached hereto including copies of the Codes 818, 819 and 953 December 1, 2007 Class Book pages.

The proposed rating values for an "all employees including office" Code 818 and the revised Codes 819 and 953 (minus the sales and clerical experience of businesses assigned to Code 818) have been balanced so that the proposed classification revisions for a June 1, 2008 effective date will generate the same premium volume as the Bureau's approved December 1, 2007 rating values. In other words and as noted above, these classification revision proposals are collectively revenue-neutral.

Memorandum of February 8, 2008

RE: Code 818. Automobile or automobile Truck Dealer

A Proposal To Revise Code 818 to "All Employees Including Office"

Page 3

Exhibit 16, "Code 818 – All Employees including Office," represents the combined five-year Codes 818, 819 and 953 payroll and loss dollars of the employers assigned to Code 818. For the record, staff's file-by-file review of employers assigned to Code 818 for this report resulted in finding several employers to be misclassified to Code 818. Staff has reclassified those employers to their proper classification(s) pursuant to the Manual and has also reassigned their Code 818 and/or Code 819 historical experience to the proper classification(s).

Payrolls reflected in Exhibit 16 are constituted in the following manner: Code 818 – 43.32 percent; Code 819 – 29.60 percent; and Code 953 – 27.08 percent. The exhibit shows the indicated residual market rating value of \$2.56. The balanced indicated residual market rating value is \$2.58. The balanced residual market indication is multiplied by a factor of .7560 to produce the indicated voluntary market loss cost, which is \$1.95. The balanced indicated voluntary market loss cost (\$1.95) and indicated residual market rate (\$2.58) are separately multiplied by a surcharge factor of 1.0293 to recognize the workplace safety and merit rating programs, producing the revised/proposed Codes 818, 819 and 953 rating values for an effective date of new and renewal policies of June 1, 2008 and later. The proposed June 1, 2008 Code 818 "all employees including office" rating values are \$2.01 for voluntary market loss costs and \$2.66 for residual market rate.

Exhibit 14, "Code 819 Minus The Code 818 Businesses Code 819 Experience," shows that the Bureau proposes to reassign 92.6 percent of the December 1, 2007 Code 819 Class Book page five-year payroll and 85.8 percent of the five-year reported Code 819 loss to Code 818. The revised Code 819 shown in Exhibit 14 produces an indicated residual market rate of \$1.35. The balanced Code 819 indicated residual market rate is \$1.36, and, when multiplied by the two factors cited above, results in the proposed June 1, 2008 revised Code 819 rating values of voluntary market loss cost at \$1.06 and residual market rate at \$1.40. The proposed June 1, 2008 Code 819 voluntary market loss cost of \$1.06 is \$0.02 higher in relation to the approved December 1, 2007 voluntary market loss cost. The proposed June 1, 2008 Code 819 residual market rate of \$1.40 is \$0.03 higher in relation to the approved December 1, 2007 Code 819 residual market rate of \$1.37. The proposed June 1, 2008 voluntary and residual market rating values remain substantially lower than the approved December 1, 2006 Code 819 voluntary and residual market rating values of \$1.25 and \$1.76, respectively.

The Bureau does not propose any revision to the approved December 1, 2007 Code 953 voluntary and residual market rating values of \$0.45 and \$0.60, respectively.

Staff reiterates that the classification revisions proposed herein are proposed to become effective beginning new and renewal policies of June 1, 2008 and later. The enabling Manual language amendments are attached.

MANUAL REVISIONS

SECTION 1

CHANGE

RULE IV - CLASSIFICATIONS

B. CLASSIFICATIONS

- 2. Standard Exception Classification
 - **c. SALESPERSONS OUTSIDE, Code 951** are employees...... except office.

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SECTION 2

CHANGES

AUTOMOBILE or Automobile Truck **DEALER** – [including service counter and parts department]<u>All Employees Including Office</u>.

[Please see the Auditing Ruling and Interpretation – "Automobile Dealerships," Section 5 for further information.]

Also includes but is not necessarily limited to: inland boat dealers, mobile home dealers, recreational vehicle dealers or specialist contractors performing mobile home set-up or warranty service.

819 [AUTOMOBILE or Automobile Truck] MOBILE, SELF-PROPELLED factory, farm or construction EQUIPMENT SALESPERSON

SECTION 5 RULINGS & INTERPRETATIONS

CHANCES
<u>CHANGES</u>
RENTAL CLERKS – AUTOMOBILE/TRUCK RENTAL AGENCIES
[As a general rule or Code 953.]
OPERATIONS NOT INCLUDED:
Assign Code 652 to modular home setup or erection, warranty service, remodeling or repair.
DELETION
AUTOMOBILE DEALERSHIPS
This Ruling and Interpretation shall be deleted in its entirety.
UNDERWRITING GUIDE
<u>CHANGES</u>
Automobile Rental – No Drivers [(Rental Clerks To Be Assigned To Code 819)]
DELETION
Rental Clerk Employed By An Automobile Or Truck Rental Agency 819

MANUAL	PAYROLL	TOTAL REPT.	PURE PREM.				NUMBER OF CASES				
YEAR	IN THOUS	LOSSES	REPORTED			DEATH	P.T.	MAJOR	MINOR	TEMP	ALL
2000	89,641	3,307,552	3.689					6	2	52	60
2001	96,513	1,896,429	1.964					3	2	44	49
2002	102,417	1,604,528	1.566					3	6	40	49
2003	106,582	2,589,890	2.429			1		7	4	59	71
2004	111,582	5,534,404	4.959					4	5	64	73
TOTAL	506,735	14,932,803	2.947			1		23	19	259	302

	REPORTED LOSSES													
MANUAL			INDEMNITY			MEDICAL								
YEAR	DEATH	P.T.	MAJOR	MINOR	TEMP	DEATH	P.T.	MAJOR	MINOR	TEMP	MED. ONLY			
2000			1,061,399	60,550	287,076			1,314,683	28,887	421,163	133,794			
2001			349,082	25,882	265,154			670,002	29,320	418,930	138,059			
2002			335,428	62,682	276,326			346,819	144,753	302,413	136,107			
2003	3,500		868,497	92,422	340,667	1,723		420,106	127,346	574,563	161,066			
2004			861,402	114,512	318,204			3,249,302	109,447	716,135	165,402			
TOTAL	3,500		3,475,808	356,048	1,487,427	1,723		6,000,912	439,753	2,433,204	734,428			
	·					•			•	·				

	TRANSLATED LOSSES													
MANUAL			INDEMNITY			MEDICAL								
YEAR	DEATH	P.T.	MAJOR	MINOR	TEMP	DEATH	P.T.	MAJOR	MINOR	TEMP	MED. ONLY			
2000			1,098,457	93,428	356,546			4,413,642	103,993	1,203,686	188,516			
2001		20,489	528,204	46,006	281,758		124,849	1,769,062	129,206	1,000,786	190,936			
2002	2,593	47,730	613,515	109,044	304,882	101	140,165	2,304,685	472,876	656,762	185,922			
2003	16,922	232,275	1,818,536	198,510	414,696	38,621	589,232	4,019,676	566,475	1,193,654	201,172			
2004	11,900	161,055	1,293,765	217,817	354,037	4,610	633,166	4,186,367	636,780	1,220,019	221,142			
TOTAL	31,415	461,549	5,352,477	664,805	1,711,919	43,332	1,487,412	16,693,432	1,909,330	5,274,907	987,688			

			SERIOUS	NON-SE	RIOUS	MED. ONLY	TOTAL
TOTAL TRAN	S. LOSSES F	PG B	24,069,61	17 9,	560,961	987,688	
TOTAL TRAN	S. LOSSES P	G A					
IBNR + FREQ	UENCY ADJU	ST.	-578,54	-:	297,082	8,945	
TOTAL LOSS	ES		23,491,07	71 9,2	263,879	996,633	
EXPECTED L	OSSES		9,242,84	17 9,	769,851	881,720	
CREDIBILITY				10	.34	.35	
PURE PREMI	JMS				-		!
INDICAT	ED (PRE-TE	ST)	4.63	36	1.828	.197	6.661
INDICAT	ED (POST-TE	ST)	2.89	98	1.143	.123	4.164
PRES. C	N RATE LEV	EL	1.49	94	1.579	.143	3.216
DERIVE	D BY FORMU	LA	1.63	34	1.431	.136	3.201
UNDERL	YING PRES.	RATE	1.82	24	1.928	.174	3.926
PROPOS	PROPOSED			12	1.438	.136	3.216
		•					
YEAR	12-1-05	8-1-06	12-1-06	12-1-07	IND. R	ATE	4.549
IND. RATES				4.55	4.55 MINIMUM PREMIUM		
MAN. RATES 5.79 5.79			9 5.84	+ 4.55	PRESE	1580	

+PROPOSED

PAYROLLS REFLECTING STANDARD EXCEPTIONS

CODE

819

PAGE 199

MANUAL	PAYROLL	TOTAL REPT.	PURE PREM.			NUMBER OF CASES					
YEAR	IN THOUS	LOSSES	REPORTED			DEATH	P.T.	MAJOR	MINOR	TEMP	ALL
2000	64,687	116,536	.180							10	10
2001	67,847	559,427	.824					2		3	5
2002	75,253	349,424	.464					1	2	8	11
2003	77,527	378,161	.487					1	4	9	14
2004	84,918	288,091	.339							8	8
TOTAL	370,232	1,691,639	.457					4	6	38	48

	REPORTED LOSSES														
MANUAL			INDEMNITY			MEDICAL									
YEAR	DEATH	P.T.	MAJOR	MINOR	TEMP	DEATH	P.T.	MAJOR	MINOR	TEMP	MED. ONLY				
2000					27,492					65,687	23,357				
2001			198,854		4,975			319,380		12,548	23,670				
2002			90,043	42,159	25,117			56,059	47,274	56,548	32,224				
2003			73,587	20,996	22,537			70,625	80,252	48,846	61,318				
2004					87,766					165,233	35,092				
TOTAL			362,484	63,155	167,887			446,064	127,526	348,862	175,661				

TRANSLATED LOSSES MANUAL INDEMNITY MEDICAL YEAR DEATH MINOR TEMP DEATH MAJOR MINOR TEMP MED. ONLY P.T. MAJOR P.T. 2000 34,144 187,732 32,910 2001 12,221 292,191 2,049 5,754 128,480 1,688,994 14,858 33,120 32,736 2002 601 12,956 172,579 55,516 30,019 21 27,496 461,948 141,755 125,437 44,018 2003 830 21,500 170,188 28,298 29,397 741 107,192 765,016 200,353 122,442 76,586 2004 1,109 15,899 139,529 29,708 87,769 254 46,944 415,397 87,710 258,390 46,918 **TOTAL** 774,487 2,540 62,576 115,571 187,083 1,016 310,112 3,331,355 444,676 727,121 233,168

			SERIOUS	NON-SEI	RIOUS	MED. ONLY	TOTAL
TOTAL TRAN	S. LOSSES F	G B	4,482,08	6 1,4	174,451	233,168	
TOTAL TRAN	S. LOSSES P	G A					
IBNR + FREQ	UENCY ADJU	ST.	-179,42	7	-35,777	1,843	
TOTAL LOSS	ES		4,302,65	9 1,4	138,674	235,011	
EXPECTED L	OSSES		2,873,00	1 1,2	203,255	177,712	
CREDIBILITY			0.	8	.28	.29	
PURE PREMI	JMS			•			
INDICAT	ED (PRE-TES	ST)	1.16	2	.389	.063	1.614
INDICAT	ED (POST-TE	ST)	.72	6	.243	.039	1.008
PRES. C	N RATE LEVE	EL É	.63	6	.266	.039	.941
DERIVE	D BY FORMUI	_A	.64	3	.260	.039	.942
UNDERL	YING PRES.	RATE	.77	6	.325	.048	1.149
PROPOS	SED		.64	3	.260	.039	.942
			_				
YEAR	12-1-04	12-1-05	12-1-06	12-1-07	IND. R	ATE	1.332
IND. RATES				1.33 MINIMUM PREMIUM			535
MAN. RATES 1.64 1.6			1.71	+ 1.33	PRESE	NT	645

+PROPOSED

MANUAL	PAYROLL	TOTAL REPT.	PURE PREM.				NUMBER OF CASES				
YEAR	IN THOUS	LOSSES	REPORTED			DEATH	P.T.	MAJOR	MINOR	TEMP	ALL
2000	2,564,914	8,104,647	.315					19	50	206	275
2001	2,801,586	9,372,654	.334			1		13	58	209	281
2002	2,735,572	7,733,877	.282					12	38	170	220
2003	2,980,613	6,524,170	.218					14	26	131	171
2004	3,140,605	3,127,227	.099					2	24	111	137
TOTAL	14,223,290	34,862,575	.245			1		60	196	827	1084

	REPORTED LOSSES													
MANUAL			INDEMNITY					MED	ICAL					
YEAR	DEATH	P.T.	MAJOR	MINOR	TEMP	DEATH	P.T.	MAJOR	MINOR	TEMP	MED. ONLY			
2000			1,665,100	638,443	1,204,390			1,272,121	1,128,471	1,524,102	672,020			
2001	3,500		1,704,826	1,013,436	1,135,382			1,154,500	2,014,853	1,543,639	802,518			
2002			1,503,583	586,624	1,180,325			1,006,041	791,196	2,103,396	562,712			
2003			1,545,627	623,588	614,648			1,437,224	589,365	1,216,828	496,890			
2004			202,003	296,511	616,322			58,178	413,474	1,011,553	529,186			
TOTAL	3,500		6,621,139	3,158,602	4,751,067			4,928,064	4,937,359	7,399,518	3,063,326			
											_			

					TRANS	SLATED LOSSES							
MANUAL			INDEMNITY			MEDICAL							
YEAR	DEATH	P.T.	MAJOR	MINOR	TEMP	DEATH	P.T.	MAJOR	MINOR	TEMP	MED. ONLY		
2000			2,599,265	985,118	1,495,852			7,145,404	4,062,496	4,355,883	946,876		
2001	5,264	100,478	2,671,992	1,351,877	1,214,280		339,046	5,455,251	4,151,218	3,751,704	1,109,883		
2002	11,391	215,866	2,826,730	849,777	1,315,093	477	497,062	7,798,478	2,558,639	4,483,574	768,665		
2003	15,512	395,550	3,155,343	768,184	773,775	11,155	1,447,200	10,007,391	1,883,743	2,615,696	620,616		
2004	13,915	208,872	1,860,993	432,997	671,193	2,532	498,615	4,539,086	1,137,931	1,755,308	707,522		
TOTAL	46,082	920,766	13,114,323	4,387,953	5,470,193	14,164	2,781,923	34,945,610	13,794,027	16,962,165	4,153,562		

			SERIOUS	NON-SE	RIOUS	MED. ONLY	TOTAL
TOTAL TRAN	S. LOSSES F	G B	51,822,86	51,822,868 40,614,338			
TOTAL TRAN	S. LOSSES P	G A	, ,	ĺ	,	,	
IBNR + FREQ	UENCY ADJU	ST.	-2,804,50	3 -1, ⁻	135,146	34,603	
TOTAL LOSS	ES	49,018,36	5 39,4	479,192	4,188,165		
EXPECTED L	OSSES		45,087,82	9 37,	549,485	3,413,589	
CREDIBILITY			.9	5	1.00	1.00	
PURE PREMI	UMS						
INDICAT	ED (PRE-TES	ST)	.34	.5	.278	.029	.652
INDICAT	ED (POST-TE	ST)	.21	6	.174	.018	.408
PRES. C	N RATE LEVI	EL	.26	0	.216	.020	.496
DERIVE	D BY FORMU	LA.	.21	8	.174	.018	.410
UNDERI	YING PRES.	RATE	.31	7	.264	.024	.605
PROPOS	PROPOSED			8	.174	.018	.410
YEAR	12-1-04	12-1-05	12-1-06	12-1-07	IND. R	ATE	.580
IND. RATES	D. RATES			.58	MINIM	UM PREMIUM	385
MAN. RATES	.73	.8:	2 .90	+ .58	PRESE	ENT	460

+PROPOSED

CLASSIFICATION STUDY - DELAWARE

IND. RATE

MAN. RATE

INDUSTRY GROUP:

CLASS:

Evhibit 14-ClassBook 810 minus evhibit 2 and 6

CODE:

819					3			Exhibit 14-ClassBook 819 minus exhibit 2 and 6.							
Manual	Payroll	Total Rept	Total Trans	Pure Prem	Claim	Claim			Number of Ca	ases					
Year	in Thous.	Losses	Losses	Reported	Severity	Frequency	Death	P.T.	Major	Minor	Temp	All			
2000	4,274	31,910	72,975	0.747	27,524	0.234	0	0	0	0	1	1			
2001	5,384	5,288	11,224	0.098	3,555	0.186	0	0	0	0	1	1			
2002	5,567	164,377	602,204	2.953	53,963	0.539	0	0	1	0	2	3			
2003	5,611	36,738	78,384	0.655	4,959	0.535	0	0	0	1	2	3			
2004	6,610	2,477	3,312	0.037	0	0.000	0	0	0	0	0	0			
TOTAL	27,446	240,790	768,099	0.877	25,981	0.291	0	0	1	1	6	8			
O.D.		0		0.000			0	0	0	0	0	0			
					REPORTE	DIOSSES									
Manual			Indemnity		ILLI OILIL	2 200020		Medical							
Year	Death	P.T.	Major	Minor	Temp	Death	P.T.	Major	Minor	Temp	Med. Only				
2000	0	0	0	0	7,344	0	0	0	0	20,180	4,386				
2001	0	0	0	0	590	0	0	0	0	2,965	1,733				
2002	0	0	90,043	0	9,004	0	0	56,059	0	6,782	2,489				
2003	0	0	0	2,180	4,337	0	0	0	3,495	4,866	21,860				
2004	0	0	0	0	0	0	0	0	0	0	2,477				
TOTAL	0	0	90,043	2,180	21,275	0	0	56,059	3,495	34,793	32,945				
O.D.	0	0	0	0	0	0	0	0	0	0	0				
					TRANSI AT	ED LOSSES									
Manual			Indemnity		TRANOLAT	LD LOGGEO		Medical							
Year	Death	P.T.	Major	Minor	Temp	Death	P.T.	Major	Minor	Temp	Med. Only				
2000	0	0	0	0	9,121	0	0	0	0	57,674	6,180				
2001	0	0	81	20	625	0	0	843	209	7,049	2,397				
2002	543	11,771	151,185	3,486	11,065	12	22,117	373,303	8,698	16,624	3,400				
2003	32	691	5,576	2,848	4,973	26	2,331	15,538	8,871	10,195	27,303				
2004 TOTAL	0 575	0 12,462	0 156,842	0	0 25 704	38	0	0	17.770	01.543	3,312				
O.D.	0	12,462	156,642	6,354 0	25,784 0	0	24,448 0	389,684 0	17,778 0	91,542 0	42,592 0				
			TOTAL TRANSI	ATED 000E0		SERIOUS	NON-SER	MED ONLY	TOTAL						
			TOTAL TRANSL IBNR + FREQ. A			584,049 (12,610)	141,458 (2,482)	42,592 140							
			TOTAL LOSSES			571,439	138,976	42,732							
			101712 200020	•		07 1,100	100,070	12,102							
			EXPECTED LOS	SSES		212,981	89,200	13,174							
			CREDIBILITY			0.01	0.05	0.05							
			PURE PREMIUN	10											
			INDICATED (F	_		2.082	0.506	0.156	2.744						
			INDICATED (P	,		1.301	0.316	0.098	1.715						
			PRES. ON RA	,		0.636	0.266	0.039	0.941						
			DERIVED BY I	FORMULA		0.643	0.269	0.042	0.954						
			UNDERLYING	PRES. RATE		0.776	0.325	0.048	1.149						
			PROPOSED			0.643	0.269	0.042	0.954						
			VEAD		12.01.06	12.01.07		IND BATE	1.250						
			YEAR	1	12-01-06	12-01-07		IND. RATE =	1.350						

1.35 1.35

1.71

ADJ. RATE =

1.35

CLASSIFICATION STUDY -

MAN. RATE

DELAWARE

INDUSTRY GROUP:

CLASS: 953

3

Exhibit15-Class book953 minus Ex3 and12

CODE:

953					3				Exhibit15-C	lass book953 mir	nus Ex3 and12
Manual	Payroll	Total Rept	Total Trans	Pure Prem	Claim	Claim			Number of (Cases	
Year	in Thous.	Losses	Losses	Reported	Severity	Frequency	Death	P.T.	Major	Minor	Temp
2000	2,501,496	8,077,788	21,553,846	0.323	27,109	0.110	0	0	19	50	205
2001	2,727,400	9,350,476	20,088,059	0.343	30,756	0.102	1	0	13	56	208
2002	2,676,717	7,442,614	20,573,319	0.278	32,038	0.080	0	0	12	37	166
2003	2,921,898	6,512,274	21,660,264	0.223	35,611	0.058	0	0	14	26	129
2004	3,082,225	2,969,862	11,199,187	0.096	18,144	0.044	0	0	2	24	109
TOTAL	13,909,736	34,353,014	95,074,675	0.247	29,257	0.077	1	0	60	193	817
O.D.	, ,	0		0.000	,		0	0	0	0	0
					REPORTE	DLOSSES					
Manual			Indemnity					Medical			
Year	Death	P.T.	Major	Minor	Temp	Death	P.T.	Major	Minor	Temp	Med. Only
2000	0	0	1,665,100	638,443	1,199,640	0	0	1,272,121	1,128,471	1,524,102	649,911
2001	3,500	0	1,704,826	1,010,862	1,135,299	0	0	1,154,500	2,002,779	1,538,385	800,325
2002	0	0	1,503,583	560,935	1,076,596	0	0	1,006,041	712,607	2,028,484	554,368
2003	0	0	1,545,627	623,588	611,415	0	0	1,437,224	589,365	1,211,038	494,017
2004	0	0	202,003	296,511	555,228	0	0	58,178	413,474	924,082	520,386
TOTAL	3,500	0	6,621,139	3,130,339	4,578,178	0	0	4,928,064	4,846,696	7,226,091	3,019,007
O.D.	0	0	0	0	0	0	0	0	0	0	0
					TRANSLATI	ED LOSSES					
Manual	D (1		Indemnity			Б и		Medical			M 1 0 1
Year	Death	P.T.	Major	Minor	Temp	Death	P.T.	Major	Minor	Temp	Med. Only
2000	0	100.543	2,599,265	985,118	1,489,953	0	0	7,145,405	4,062,496	4,355,884	915,725
2001 2002	5,264 10,999	100,543 211,838	2,671,603 2,776,087	1,348,310 809,523	1,214,151 1,202,151	0 564	338,993 489,396	5,448,612 7,658,583	4,115,265 2,338,116	3,738,469 4,318,795	1,106,849 757,267
2002	15,516	394,904	3,152,753	767,810	770,158	11,775	1,446,911	9,996,924	1,881,848	2,604,638	617,027
2003	13,181	197,988	1,763,909	412,343	610,075	2,380	473,965	4,319,289	1,091,981	1,618,320	695,756
TOTAL	44,960	905,273	12,963,617	4,323,104	5,286,488	14,719	2,749,265	34,568,813	13,489,706	16,636,106	4,092,624
O.D.	0	0	0	0	0	0	0	0	0	0	0
						SERIOUS	NON-SER	MED ONLY	TOTAL		
			TOTAL TRANSL		3	51,246,647	39,735,404	4,092,624			
			IBNR + FREQ. A			(2,742,424)	(1,107,142)	33,917			
			TOTAL LOSSES	i		48,504,223	38,628,262	4,126,541			
			EXPECTED LOS	SSES		44,093,863	36,721,703	3,338,337			
			CREDIBILITY	70_0		0.94	1.00	1.00			
			PURE PREMIUN								
			INDICATED (F			0.349	0.278	0.030	0.657		
			INDICATED (P			0.218	0.174	0.019	0.411		
			PRES. ON RA			0.260	0.216	0.020	0.496		
			DERIVED BY I			0.221	0.174	0.019	0.414		
			UNDERLYING PROPOSED	PRES. RATE		0.317 0.221	0.264 0.174	0.024 0.019	0.605 0.414		
					10.04.05	10.01.05					
			YEAR		12-01-06	12-01-07		IND. RATE =	0.586		
			IND. RATE		0.00	0.59	į.	AD L DATE	0.50		

0.90

0.59

ADJ. RATE =

0.59

CLASSIFICATION STUDY -

MAN. RATE

DELAWARE

INDUSTRY GROUP:

CLASS: 818+819+953

3

Exhibit 16: 818 - All employees Including Office.

CODE:

	-				-			_			g cc.
Manual	Payroll	Total Rept	Total Trans	Pure Prem	Claim	Claim			Cases		
Year	in Thous.	Losses	Losses	Reported	Severity	Frequency	Death	P.T.	Major	Minor	Temp
2000	212,150	3,158,276	6,645,098	1.489	43,238	0.325	0	0	5	2	62
2001	231,928	2,470,041	6,345,757	1.065	41,961	0.237	0	0	5	4	46
2002	229,900	2,063,833	6,018,686	0.898	30,979	0.265	0	0	3	9	49
2003	236,394	2,930,449	10,737,506	1.240	32,923	0.351	1	0	8	7	67
2004	247,547	5,977,374	10,699,339	2.415	69,525	0.335	0	0	4	5	74
TOTAL	1,157,919	16,599,973	40,446,386	1.434	44,684	0.303	1	0	25	27	298
O.D.		0		0.000			0	0	0	0	0
1					REPORTE	DIOSSES					
Manual			Indemnity		INEI OINTE	D LOGOLO		Medical			
Year	Death	P.T.	Major	Minor	Temp	Death	P.T.	Major	Minor	Temp	Med. Only
2000	0	0	926,120	60,550		0	0	1,189,201	28,887	466,670	174,874
2001	0	0	547,936	28,456	269,289	0	0	989,382	41,394	431,395	162,189
2001	0	0	335,428	130,530	388,379	0	0	346,819	270,616	417,923	174,138
2002			942,084	111,238	359,539	•		490,731	204,103	· ·	197,808
	3,500	0	•	•	•	1,723	0		•	619,723	•
2004	3.500	0	861,402	114,512	467,055	1 723	0	3,249,302	109,447	968,839	206,817
TOTAL	3,500	0	3,612,970	445,286	1,796,236	1,723	0	6,265,435	654,447	2,904,550	915,826
O.D.	0	0	0	0	0	0	0	0	0	0	0
					TRANSLAT	ED LOSSES					
Manual			Indemnity					Medical			
Year	Death	P.T.	Major	Minor		Death	P.T.	Major	Minor	Temp	Med. Only
2000	0	0	870,511	93,429	387,472	0	0	3,609,553	103,993	1,333,743	246,397
2001	0	32,731	820,589	51,380	286,645	0	253,285	3,463,013	179,486	1,034,321	224,307
2002	2,949	52,564	682,552	200,610	428,300	141	153,203	2,525,304	823,873	911,317	237,873
2003	17,743	252,947	1,983,739	224,237	439,836	39,495	695,002	4,770,797	758,409	1,308,239	247,062
2004 FOTAL	13,795	188,243	1,530,460	268,207	502,928	5,699	706,407	4,820,830	771,533	1,614,723	276,514
O.D.	34,487 0	526,485 0	5,887,851 0	837,863 0	2,045,181 0	45,335 0	1,807,897 0	19,189,497 0	2,637,294 0	6,202,343 0	1,232,153 0
0.5.	· ·	v								· ·	· ·
						SERIOUS	NON-SER	MED ONLY	TOTAL		
			TOTAL TRANSL		S	27,491,552	11,722,681	1,232,153			
			IBNR + FREQ. A			(800,500)	(361,577)	11,040			
			TOTAL LOSSES	5		26,691,052	11,361,104	1,243,193			
			EVDECTED LOS	CCEC		12 705 005	11 612 020	1 111 600			
			EXPECTED LOS CREDIBILITY	DOEO		12,795,005 0.18	11,613,928	1,111,602 0.61			
			OVEDIBILI I			0.16	0.60	0.01			
			PURE PREMIUM								
			INDICATED (I	,		2.305	0.981	0.107	3.393		
			INDICATED (F	,		1.441	0.613	0.067	2.121		
			PRES. ON RA			0.905	0.822	0.079	1.806		
			DERIVED BY			1.001	0.697	0.072	1.770		
			UNDERLYING	PRES. RATE		1.105	1.003	0.096	2.204		
			PROPOSED			1.021	0.711	0.073	1.806		
			YEAR		12-01-06	12-01-07		IND. RATE =	2.555		
			IND. RATE		0. 00	2.56			2.000		
						2.00					

3.28

2.56

ADJ. RATE =

2.56