Exhibit 16 As Filed

DELAWARE COMPENSATION RATING BUREAU, INC.

Small Deductible Program

The attached exhibits review the impact of deductibles on loss costs and residual market manual rates. Staff has proposed slight increases to the loss elimination ratios and premium credit factors currently in effect.

2009 DELAWARE DEDUCTIBLE STUDY

Deduct. Level	Effect of Deductible on Losses	Selected	Loss Elimination Ratio	Current Loss Elimination Ratio
		(12)	(13)	(14)
500	0.9794	0.980	0.020	0.020
1,000	0.9626	0.965	0.035	0.035
1,500	0.9495	0.950	0.050	0.045
2,000	0.9389	0.940	0.060	0.055
2,500	0.9298	0.930	0.070	0.065
3,000	0.9219	0.925	0.075	0.070
3,500	0.9147	0.915	0.085	0.080
4,000	0.9082	0.910	0.090	0.085
4,500	0.9021	0.905	0.095	0.090
5,000	0.8965	0.900	0.100	0.095

Proposed Effective Date 12/1/09

Deduct. Level	Effect of Deductible on Man.Rate	Selected	Premium Credit	Current Premium Credit
		(15)	(16)	(17)
500	0.9832	0.985	0.0150	0.0150
1,000	0.9695	0.970	0.0300	0.0300
1,500	0.9588	0.960	0.0400	0.0400
2,000	0.9501	0.950	0.0500	0.0450
2,500	0.9427	0.945	0.0550	0.0550
3,000	0.9362	0.935	0.0650	0.0600
3,500	0.9303	0.930	0.0700	0.0650
4,000	0.9250	0.925	0.0750	0.0700
4,500	0.9200	0.920	0.0800	0.0750
5,000	0.9155	0.915	0.0850	0.0800

2009 DELAWARE DEDUCTIBLE STUDY

Loss Range		Total Incurred Losses (1)	Adj Factor (2) a	Adj Factor (3) b	Adjusted Losses (1)*(2)*(3) (4)
$\begin{array}{cccc} 0 & - \\ 500 & - \\ 1,000 & - \\ 1,500 & - \\ 2,000 & - \\ 2,500 & - \\ 3,000 & - \\ 3,500 & - \\ 4,000 & - \\ 4,500 & - \\ 5,000 & - \end{array}$	499 999 1,499 1,999 2,499 2,999 3,499 3,999 4,499 4,999 & UP	2,788,706 7,549,858 8,460,187 7,763,794 6,379,981 5,421,529 4,790,931 4,470,724 3,998,837 3,688,505 7777,706,961	$\begin{array}{c} 1.000\\ 0.995\\ 0.990\\ 0.985\\ 0.980\\ 0.975\\ 0.970\\ 0.965\\ 0.960\\ 0.955\\ 0.950\end{array}$	0.9996 0.9996 0.9996 0.9996 0.9996 0.9996 0.9996 0.9996 0.9996 0.9996 0.9996	2,787,591 7,509,104 8,372,235 7,644,278 6,249,880 5,283,876 4,645,344 4,312,523 3,837,348 3,521,113 738,526,084
	Deduct. Level (5)	# Claims >= Deduct Level (6)	Adj Losses < Deduct. Level (7) c	[(2)*(3)* (5)*(6)] (8)	Adj Tot Ded Collected (7)+(8) (9)
	500 1,000 1,500 2,000 2,500 3,000 3,500 4,000 4,500 5,000	44,947 34,580 27,743 23,274 20,420 18,435 16,956 15,762 14,819 14,040	2,787,591 10,296,695 18,668,930 26,313,208 32,563,088 37,846,964 42,492,308 46,804,831 50,642,179 54,163,292	22,352,188 34,220,506 40,973,886 45,598,793 49,753,841 53,624,392 57,245,982 60,501,870 63,659,179 66,663,324	25,139,779 44,517,201 59,642,816 71,912,001 82,316,929 91,471,356 99,738,290 107,306,701 114,301,358 120,826,616

Deduct. Level (5)	Effect of Deductible on Losses (10) d	Effect of Deductible on Manual Rate (11) e	
500	0.9794	0.9832	
1,000	0.9626	0.9695	
1,500	0.9495	0.9588	
2,000	0.9389	0.9501	
2,500	0.9298	0.9427	
3,000	0.9219	0.9362	
3,500	0.9147	0.9303	
4,000	0.9082	0.9250	
4,500	0.9021	0.9200	
5,000	0.8965	0.9155	

2009 DELAWARE DEDUCTIBLE STUDY

- a Adjustment factor for the amount of the deductible which will actually be reimbursed to the insurer by the insured.
- Adjustment factor to put deductibles on a per occurrence basis instead of a per claim basis = 0.9996
- c Downward accumulation of Column (4).
- d Effect of deductible on Losses = [A/B - Col(9) + P*C*Col(3)] /(A/B)

A = Total incurred indemnity on total incurred medical on all c	•			
sum of Column (4) =	792,689,376			
B = Death indemnity losses plus	B = Death indemnity losses plus all medical losses			
as a % of all losses =	0.687			
Per Table II 2008, Sect C				
1.All Losses	1,342,834,349			
2.Death Indem (00)	138,498			
3.All Medical (00)	9,087,797			
4.[((2)+(3))/(1)]	0.687			
*100				
C = # of death indemnity claims plus # of claims with				
some medical portion =	54,397			
P = Processing expense per claim =				
	25.00			

- e Total effect of deductible
 - = [(Column (10) * permissible loss ratio) + fixed expenses] / (1 - variable expenses)

Fixed expenses = LAE + General + Admin		
0.1443		
P&C + Prem Tax		
ax + Prem Discount		
0.2129		
0.6428		